

## COMMENT LETTER

## RESPONSES

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- 282 | page 7, paragraph 1: Would California use be more heavily monitored in an attempt to free up existing water currently overdrafted by other users to avoid the need for surplus?
- 283 | page 7, paragraph B: There is nothing about Arizona waiving its 46% of any surplus in favor of MWD or Nevada in the DEIS. Since Arizona is the state with the most to lose in the event of a shortage brought on by interim surplus uses, their reasons for doing or not doing this would be complex.
- 284 | page 9, #4: The existence of this "Colorado River Alternative Operating Strategies for Distributing Surplus Water and Avoiding Spills" should be more fully referenced in the main part of the DEIS, especially if it was instrumental in determining the surpluses from 1998-2000.
- 285 | page 10, #5: The Six State plan would have water used for all beneficial purposes, but does not provide for a limit based on the amount of water available over the target elevation. Please explain this distinction.
- 286 | page 12, IV: The issue of overrun accounting and the need to be especially vigilant about such, especially if this can affect future shortages, should also be noted earlier in the DEIS.
- 287 | *Attachment E: Surplus Criteria Proposal by California*  
page A-4, paragraph 3: It should be noted in the DEIS that while stored groundwater may save Arizona and Nevada from a shortage caused by surplus criteria implementation in the near term, it does not provide long term assurance.
- 288 | page A-5: Please note that any increase in surplus criteria would require additional compliance.  
*Attachment F: Surplus Criteria Proposal by Pacific Institute*  
We have no comments on this attachment.
- 289 | *Attachment G: Lower Basin Depletion Schedule*  
Please provide page numbers for this attachment.
- 290 | page 1, paragraph 2: Please explain why the water transfers under the 4.4 Plan were not included in the Flood Control Alternative.
- 291 | page 1, paragraph 6: Was the determination of how much water the states would get out of surplus criteria based on how much they asked for in their future depletion schedule? If there was not enough water at the water surface elevation to meet all those needs before it fell below a target elevation, what uses would be curtailed?

- 282: California would be monitored for its progress in implementing its Colorado River Water Use Plan. Each of the Lower Division states would be monitored as to use of its basic apportionment and purposes for which surplus water is used.
- 283: Reclamation does not anticipate any waiver of Arizona's percentage right to surplus water. The percentages would apply when a quantified surplus is declared that must be divided among the Lower Division states.
- 284: The influence of this document is discussed in the introduction to Section 2.2.4.
- 285: The provisions of the Six States Alternative in this FEIS take precedence over the provisions cited in the attachment.
- 286: Reclamation is formulating a policy for overrun accounting which we expect will be published in the Federal Register for public review and comment. However, the matter is beyond the scope of this FEIS and is not described in this FEIS.
- 287: Reclamation's understanding is that conjunctive use of groundwater will play an important role in the water supply for all the Lower Division states.
- 288: Comment noted.
- 289: The depletion schedules have been replaced with revised schedules used to model the baseline conditions and surplus alternatives for the FEIS. Page numbers have been added.
- 290: In the FEIS, the Flood Control Alternative was modeled using California intrastate transfers. See response to Comment 37-11 for additional discussion.
- 291: The explanation of surplus depletion schedules provided in this paragraph has been revised to provide more clarity. Additional more detailed explanation on the modeling criteria used to determine the availability and amount of surplus water deliveries under the modeled baseline conditions and the different surplus alternatives is provided in Attachment I of the FEIS.

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292 | In Table G-1, are the lower Arizona depletions after 12/24 the result of Level 1 shortages that only affect CAP?

293 | *Attachment H: Draft Interim Surplus Guidelines*

Please number the several sections of this attachment sequentially. The separate numbering system is difficult to use once the sections are mixed up.

294 | These summaries should contain all parts of the Six States and California plans that would be incorporated into the preferred alternative.

295 | Please revise the sections in the introduction to each alternative that address the greater predictability rather than the probability that results from the development of these criteria.

296 | Please clarify the assumption that under all surplus declarations, there would be adequate water supplies to meet all appropriate surplus demands without falling below any designated trigger point.

297 | In the Six States, California and Shortage Protection alternatives, there are tables showing amounts of water available for surplus use. Where did these tables come from and why are they not discussed in the DEIS proper? Why are they not included in earlier Attachments on these alternatives? Why is there not a set of these for the Flood Control alternative?

298 | *Attachment I: Detailed Modeling Documentation*

No data were provided in this attachment. While this will be provided in the FEIS, it would be more appropriate for examination of the models if it was provided here.

299 | *Attachment J: Upper Basin Depletion Schedule*

For the purposes of NEPA, it may not be necessary to divide this schedule into sections based on baseline projects, approved future projects (all compliance completed), and other future projects (compliance not completed), but for ESA this may be an issue of concern.

*Attachment K: Sensitivity Analysis of Shortage Assumptions*

We have no comment on this attachment.

*Attachment L: Comparison of Colorado River Flows*

300 | cont'd below | These could be very useful. We would suggest using a finer scale since most values are very close for most of the period of record. This would eliminate the appearance of a complete overlay of the alternative results. Since the effects of the action are hidden in that overlay, it

292: Attachment G of the DEIS is now Attachment H in the FEIS. The tables in these attachments represent the Lower Basin Depletion Schedules that were used as input to the model. These schedules were updated by the states in September 2000, and represent the states' projections of their future water demands under the respective water supply conditions.

293: The attachment has been revised. The draft guidelines focus on presenting information for the preferred alternative. It is now Attachment I. See response to Comment 57-279 above.

294: The Guidelines contain detailed provisions of Reclamation's preferred plan, and is not necessarily intended to conform to the Seven States proposal.

295: As stated in the purpose and need discussion in Section 1.1.3, a greater degree of predictability is being sought for mainstream users of Colorado River water.

296: When surplus water delivery is based on a trigger elevation, the water level could drop below the trigger elevation once the deliveries are made. See also response to Comment 57-64.

297: The tables are in Chapter 2 of the FEIS. The tabulated values were produced by the operational model.

298: Copies of this Attachment were available at the technical presentation on August 15, 2000, at the four public hearings for the DEIS, and upon request. It is Attachment J to the FEIS.

299: Comment noted.

300: It is difficult to decrease the scale of these graphs without losing data. The size of the data markers has been reduced to make it easier to distinguish between alternatives. Graphs in Attachment L supplement information in the main body of the FEIS.