

COMMENT LETTER

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- 55 | Page 2-2, 2.2.1.4
If the Flood Control Strategy is what was used to determine surpluses in 1998-2000, then why was the 75R chosen as the baseline and no-action alternative? Also, how does the Flood Control Alternative differ, if at all, from the criteria used in 1998-2000?
- 56 | Page 2-3, 2.2.2
paragraph 1: What is a "conjunctive use program?" This section should also look at why a program that only provided enough extra water to meet California's needs after all other available sources had been tapped is not considered in this DEIS. The California alternative does not have this direction.
- 57 | Page 2-3, 2.2.3
paragraph 2: Although the increase in water deliveries to Mexico is not in the purpose and need of the interim surplus criteria, other features of the Pacific Institute proposal do meet the purpose and need and should be reviewed for how they would meet the needs of California.
- 58 | Page 2-4, 2.2.4
paragraph 3: If the DEIS does not contain the full complement of items in the California and Six States alternatives, how can a decision be made on implementing the entire plan from the analysis in the DEIS? What actually is being covered, and how does the lack of coverage for other parts of the alternatives affect the analysis? Please explain more fully.
- 59 | Page 2-4, 2.2.5
paragraph 1: The designation of a surplus condition under the no action and baseline condition is not less predictable or more uncertain than under the more liberal alternatives. The probability of a surplus being declared is less, because the criteria under these two alternatives are more conservative in retaining water in Lake Mead. The same information used to determine water levels in the reservoir over time apply to all alternatives. The more liberal alternatives provide for a higher probability that the analysis will enable a surplus to be declared over the no action and baseline condition.
- 60 | Page 2-5, 2.2.5
paragraph 2: Please clarify why the 75R was selected as the baseline condition and not the Flood Control criteria actually used in 1998-2000 or the 70R used in planning. Use of the more liberal 75R to represent the baseline when it was not used as such is inappropriate. The discussion here of the choices made needs clarification.
- 61 | Page 2-5, 2.3
paragraph 1: Do we include in the alternatives a written policy on exactly what California has to accomplish each year or set of years in order to justify the continuation of interim surplus criteria?
- 62 | paragraph 2: Flood Control is an alternative for discussion even though it may actually be the no action alternative, and 75R, which is not the actual baseline, is not an alternative. This
cont'd below
- 55: See the response to Comment 57-11 regarding the selection of the 70R strategy as the baseline. The determination of surplus conditions under the Flood Control Alternative would be the same procedure as was used in 1998-2000.
- 56: A conjunctive use is a state authorized program based on the use of a rechargeable groundwater aquifer to supplement surface water supply during periods of shortage. Groundwater pumped at such times would be replaced by artificial recharge when recharge water is available. See the response to Comment 57-8 regarding the formulation of an alternative to meet only California's needs.
- 57: See the response to Comment 11-6 and 11-8.
- 58: The Six States and California Alternatives are derived from the triggers and other operational provisions described in the respective proposals from the states, but the alternatives evaluated do not necessarily contain all the provisions of those proposals. Thus what is actually covered and proposed for implementation is the specific provisions of the alternatives described in Chapter 2 and in the detailed Guidelines in Attachment I. The operational modeling results, expressed in terms of river flows, reservoir levels, and the associated environmental impacts for each alternative are unique to the specific provisions of each alternative.
- 59: While it is true that the alternatives having lower trigger elevations than the baseline increase the probability of surplus water determinations during the interim period, the predictability aspect is critical to the integrated management of available water resources by the Lower Division States. Each of the Lower Division States currently manages surface and groundwater sources to meet its water delivery commitments. The establishment of triggering elevations on Lake Mead or flood control rules as the criteria for determining surplus water availability would enable water planners of the Basin States to forecast Colorado River water availability in advance with a reasonable degree of certainty and thereby avoid unpredictable water supply shortfalls that could result from year-to-year determinations under the AOP process.
- 60: Section 2.2.5 has been revised.
- 61: Please see response to Comment 33-3.
- 62: Section 2.3 has been revised for clarification.

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cont'd | issue should be clarified. Also, exactly what method of surplus determination that will be used in 2016 and beyond should be clearly stated here.
- 63 | Page 2-6, 2.3.1.1
In the last sentence of this paragraph, please add the word "only" between "would" and "be." Since the 75R is a conservative plan, surpluses would only be achieved when lake levels are very high.
- 64 | Page 2-6, 2.3.1.2
The data set of past inflows used to run the 75R models should be the same as for the other models. The first sentence of this paragraph implies otherwise. Although there is no trigger elevation because the yearly storage need is variable (due to projected inflows), is there some elevation below which water would not be removed? Are the 1194 and 1196 feet elevations minimums that would not be compromised? Is there likely to always be enough water in the system when this criteria is met to meet all the States desired depletions? How does Mexico qualify for its 200,000 af under this alternative?
- 65 | Page 2-7, 2.3.2.1
The baseline/no action alternative can declare a surplus in any month through to the end of the water year. Does the Flood Control alternative operate like this, or is it like the other alternatives that determine a surplus in January? Should there be a 5 year review associated with this alternative?
- 66 | Page 2-8, 2.3.2.2
paragraph 1: Where was the 1211 elevation figure derived from? This is less than the 1.5 maf flood pool defined earlier. Is this the average elevation needed for snowmelt flood control? Should there be a 5 year review associated with this alternative?
- 67 | Page 2-9, 2.3.3.2
paragraph 1: The tier lines on the Six States alternative do not increase over time to account for increased future depletions from the system. How does this change the effects from those that would be seen in the 75R or California alternatives where there is an increase? We also suggest that the section provide brief information on the allowed uses of water in each tier without having to reference Attachment G. The amount of water generated should also be mentioned.
- 68 | Page 2-10, 2.3.3.2.1
paragraph 2: Why did the modeling not use the 70R trigger called for in the alternative? If this alternative was selected, would this change be made to the alternative description? How does this change the results of the analysis that might favor or dis-favor the alternative?
- 69 | Page 2-11, 2.3.3.2.4
How would Mexico receive surplus water under this alternative?
- 63: The change has been made.
- 64: The same runoff data is used for the Baseline and all the alternatives. This point was clarified in the section cited. The elevations of the triggering line during the interim period are based on a statistical analysis of required reservoir space for runoff in relation to the cited percentage of runoff (i.e., 70R). If a surplus is determined based on that line, it is possible for the level of Lake Mead to go below the triggering line, depending on actual runoff conditions in the year. In as much as the baseline triggering elevations for surplus water determination would involve a relatively full condition of Lake Mead, there would be sufficient water to meet the States' desired depletions. Mexico would receive its additional apportionment of 200,000 acre-feet in years when flood control releases were necessary. This would occur when Lake Mead levels were high enough to invoke the flood control operating rules (i.e., the Lake Mead levels indicated by the average Flood control release trigger shown on Figure 2-1).
- 65: A surplus may be determined in any month for any alternative due to flood control 70R and the other surplus alternatives determine surplus at the first of the year. See Section 1.1.1 for information regarding the 5-year review of the interim surplus criteria.
- 66: A five-year review is included in this alternative.
- 67: See Section 2.3.2.2 for information regarding the 1211 elevation. See Figure 3.3-10 for information regarding the 1.5 maf flood pool.
- 68: See response to Comment 37-8.
- 69: Under the Six States Alternative, as under all alternatives, Mexico would receive its additional apportionment of 200,000 acre-feet in years when flood control releases were necessary from Lake Mead.