

10-0176704146

PAGE 1/2



July 17, 2000

By facsimile 702-793-8042

Jane Harkins
LCR Office
Bureau of Reclamation
Boulder City, NV 89006-1470

Dear Jane:

Thank you for the \$1-pound CR interim surplus criteria/draft FIS. I have just read Chapter I and have serious concerns:

1. The time frame for your meetings and written comments is too close. It does not allow for thoughtful review and deliberation and is not reasonable based on the complexity of issues.
2. Why, as was the case in the June 1999 scoping letter, are no meetings held in the Upper Basin States?
3. Unfortunately, very few are competent and knowledgeable on such technical matters as the DEIS. Notwithstanding this, I believe many good citizens would be alarmed at this process and its potential consequences. This is a dynamic process and I would suggest the possibility of great insight by common people if they are made aware.
4. This report gives me the feeling of a freight train going too fast--why?
5. I know of no water institution in the United States that is ready for long-term drought. The probability of this event has never been higher. Astonishingly, everyone assumes the past 100-year water supply will continue. If I could dictate that all studies could be based on a 1,000-year best estimate of water supply, I would be doing a great favor to everyone, and most particularly California.

[illegible]

1: CEQ regulations require a 45-day minimum review period for a DEIS, starting after a Notice of Availability is published in the Federal Register. Reclamation's practice is to extend this review period an additional 15 days, allowing for a 60-day minimum comment period. The filing date of the DEIS was July 7, 2000 and the public comment period officially ended on September 8, 2000. Reclamation believes that this 63-day period allowed sufficient time for review and comment on the DEIS. One of the four public hearings to receive public comments on the DEIS was held in an Upper Basin state, in Salt Lake City, Utah. As discussed in the DEIS, the area of potential effect analyzed in the EIS is the Colorado River corridor from Lake Powell down to the SIB. Because the majority of this area is located within the Lower Basin, and because surplus determinations made by the Secretary influence water supply in the Lower Division states, holding the majority of the public hearings within the Lower Basin was determined appropriate. The NEPA process, including scoping and the preparation and distribution of the DEIS and this FEIS, has provided an opportunity for Reclamation to identify and disclose to the public the potential effects of interim surplus criteria.

COMMENT LETTER

RESPONSES

JUL-17-00 13:11 FROM KIMRDE ARLINGTON HTS ID: B475784136 PAGE 2/2

Ms. Harkins
July 17, 2000
Page 2

2

This report doesn't seem to want to address the relevant "what if?" I believe the public has a right to know.

I hope you will consider the need to slow down and include the other half who have the greatest risk—the Upper Basin States and their citizens.

Best regards,

American Water Resources, Inc.

Thomas C. Havens
Thomas C. Havens
President

TCH/aa

2: Predictions of future climate are difficult to make, and there are conflicting points of view within the scientific community. Although the index sequential method of modeling using historical records is not a perfect predictor, it provides a rigorous representation of possible future hydrology during the coming decades. Statistical distributions obtained using this method do provide an indication of what could happen during periods of drought, using past drought scenarios as indicators.