important to note that native fishes in new reservoirs may experience a recruitment window if water levels are very low and then raise suddenly. The discussion of these issues in the DEIS is not adequate to support your conclusions.

Page 3.7-7, 3.7.3.2.2
This is the first example of where the lower Colorado River (below Hoover, Davis and Parker Dams) is not included in the analysis. Please correct this oversight.

Page 3.7-7, 3.7.3.3.1
paragraph 2: The water level fluctuations have not been described as "gradual" in the DEIS. No discussion on the speed of fluctuations has been made. Changes of 15-20 feet per month may not be "gradual" in a biological sense. The statements made here require additional supporting information, including a discussion under the effects to lake elevation and river flow earlier in Chapter 3, of changes to the speed of elevational changes due to the surplus criteria.

Page 3.7-8, 3.7.3.3.1
Please explain why selenium levels would not be affected. If Endrin or other toxic materials are entering the system via Las Vegas Wash, would not reduced levels of flow in Las Vegas Bay have an effect on its concentrations and dispersal?

Page 3.7-8, 3.7.3.3.2
There is no discussion of the river below Hoover, Davis or Parker Dams. Please correct this oversight.

Special Status Species

Page 3.8-1, 3.8.1
Why does this section not address species in the riverine sections below Hoover, Davis and Parker Dams? Please correct this oversight throughout this section.

Page 3.8-5, 3.8.2.2.1.2
paragraph 2: Under declining water levels, beaches currently used may no longer be available, and new beaches in areas not presently desirable may be subject to heavy usage. The assumption made in this paragraph is not supported. Further declining water levels may change the depth to water or other factors supporting the milkvetch, contributing to the reduction or elimination of a population. Because the changes to elevation will be occurring over a year or set of years, there may not be sufficient time for the plant to regenerate a population at the new water line, or if it does, it may be more likely to be flooded out by any sudden increase from a wet year. The dynamics of this species, and the relation to reservoir levels are not fully analyzed in this section. This discussion holds true for the Grand Canyon evening primrose, Las Vegas bear poppy and sticky buckwheat as well as the Geyer's milkvetch.

183: The FEIS includes expanded and new discussions in appropriate sections of impacts to resources below Hoover Dam.

184: The 15 to 20-foot elevation changes described in the text occur over a year, not month-to-month. The rate of fluctuations would remain approximately the same with adoption of interim surplus criteria. Section 3.7.3.3.1 has been modified.

185: Studies are ongoing to determine effects of toxins on fish, with the premise that increased concentrations show increased effects, and to determine what limits need to be enforced. Section 3.5.3 discusses potential water quality effects associated with Las Vegas Wash and Lake Mead.

186: The FEIS considers the potential effects of increases in the temperature of water released from Hoover Dam under decreased reservoir elevations on the sport fishery within the river between Hoover Dam and Lake Mohave in Section 3.7.3. Reclamation has determined that fluctuations in flows below Hoover Dam to the SIB under the alternatives would be within the historical operating range of the river and would, therefore, not affect aquatic resources within this segment.

187: Section 3.8 of the FEIS addresses species below Hoover Dam, downstream to the SIB with Mexico.

188: This section is meant only to provide existing information. The analysis on how the changes in reservoir levels might impact these plant species is included in the Environmental Consequences section.
189: See response for Comment 57-187.

190: Paragraph has been modified in the FEIS for clarification.

191: The table, and subsequent discussion of the species, has been reorganized as you suggested.

192: The discussion on lakeside habitat and riverside habitat in the lower canyon will be presented in separate sections in the FEIS in order to clarify these two distinct areas. No additional information will be added to the existing discussion on habitat in the lower canyon and potential changes in riverside and marsh habitat as it is adequately addressed.

193: The lakeside habitat has been organized under its own headings. Riverslide habitat along the lower river has been added with reference to detailed discussions from the biological assessment (BA) prepared by Reclamation for the interim surplus criteria.

194: Additional information on water levels and development of riparian and marsh habitats in the Lake Mead Delta and Lower Grand Canyon has been added to the discussion of the FEIS. This information summarizes findings from the following Reclamation report: Willow Flycatcher Disturbances, Threats and Protective Management Along the Lower Virgin and Colorado Rivers - 1997 (Reclamation, 1998).

195: Additional information on marshes and backwaters along the Colorado River from below Hoover Dam to the SIB has been added. The discussion references findings from Reclamation’s BA that examines potential effects of the implementation of the interim surplus criteria on these habitats.

196: The sentence has been reworded in the FEIS.

197: See response to Comment 57-187.