

>>> craigmorgan@avalex.info 04/30/07 4:41 PM >>>
Please find my attached comments

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VIA EMAIL

April 30, 2007

Bureau of Reclamation
Lower Colorado Region, Attention: BCOO-1000
P.O. Box 61470
Boulder City, Nevada 89006-1470

Re: Draft EIS - Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

The following comments are provided concerning the Draft Environmental Impact Statement (EIS) for the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead.

On page ES-15 of the Executive Summary the statement is made that “With respect to other electrical power resource issues, the Water Supply Alternative has a higher potential for total loss of generation at the Glen Canyon Powerplant and the Hoover Powerplant than the other action alternatives and the No Action Alternative”. This seems obvious for Glen Canyon; however, it isn’t so obvious with respect to Hoover? The EIS should identify the basis for this statement.

Chapter 2 – Alternatives: The Draft EIS assesses four action alternatives: (1) Basin States Alternative, (2) Conservation Before Shortage Alternative, (3) Reservoir Storage Alternative, and (4) Water Supply Alternative. Each of these alternatives, with the exception of the Water Supply Alternative, includes a mechanism for the storage and delivery of conserved system and non-system water in Lake Mead (i.e., intentionally created surplus). The omission of a mechanism for storage and delivery under this alternative is arbitrary and does not allow this alternative to be evaluated on an equal basis against the other alternatives. This is particularly evident with respect to the probability distributions concerning shortage occurrences presented in Chapter 4, where had such a mechanism been included in the Water Supply Alternative even fewer shortages would likely occur. The EIS should include an analysis of the Water Supply Alternative with a similar mechanism for the storage and delivery of water. Likewise, the No Action Alternative should also be evaluated with a similar mechanism for storage and delivery.

On page 2-5 in the discussion concerning the No Action Alternative, Table 2.2-1 shows that under a Stage II shortage California will take a 60-65 percent of the shortage. The basis for this conclusion or assumption should be identified in the EIS.

Similarly, on page 4-121, Table 4.4-11 shows different Lower Basin shortage volumes and the portion of the shortage that was assumed to be distributed to Arizona. Similar tables are subsequently provided for California and Nevada. The basis for these assumptions should be identified in the EIS.

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Beginning on page 5-7, the EIS briefly discusses a number of proposed water supply projects of the SNWA that the proposed Colorado River Interim Guidelines would presumably facilitate. A complete description of these projects is needed to adequately assess the impact of the various shortage alternatives. Likewise, a more complete description of the Systems Conveyance and Operations Program (SCOP) is needed. It is unclear whether the water quality modeling performed in Chapter 4 of the EIS incorporates the SNWA water supply proposals and the SCOP, which it should if the analysis is to accurately assess the impacts of the various shortage alternatives.

Thank you for considering these comments.

Sincerely,

/c/ Craig W. Morgan

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