

**From:** Hess, Gordon [GHess@sdewa.org]  
**Sent:** Monday, April 30, 2007 3:53 PM  
**To:** strategies@lc.usbr.gov; Terry Fulp (E-mail)  
**Subject:** Comments re. Draft EIS

**Attachments:** 04\_30\_07 Environmental Impact Ltr BoR.pdf

Attached for your consideration are comments submitted by the San Diego County Water Authority regarding the DEIS for *Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead*.

Thank you for providing the Water Authority the opportunity to comment on this important matter. A hard copy is being sent to you under a separate cover.

Gordon A. Hess  
Director of Imported Water  
San Diego County Water Authority

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# San Diego County Water Authority

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April 30, 2007

MEMBER AGENCIES Regional Director, Lower Colorado River Region

Bureau of Reclamation

Carlsbad Municipal Water District Attention: BCOO-1000, P.O. Box 61470

City of Del Mar Boulder City, NV 89006-1470

City of Escondido

City of National City

City of Oceanside

City of Poway

City of San Diego

**Re: Comments on *Draft Environmental Impact Statement, Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead***

Fallbrook Public Utility District

**Dear Regional Director:**

Helix Water District

Olivenhain Municipal Water District

This letter provides comments on the *Draft Environmental Impact Statement, Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead* (72 Fed. Reg. 9,026) (Feb. 28, 2007) (DEIS). The San Diego County Water Authority recommends selection of the Basin States' Alternative described in the DEIS as the preferred alternative in the Final Environmental Impact Statement and as the selected action in the Record of Decision.

Otay Water District

Padre Dam Municipal Water District

Camp Pendleton Marine Corps Base

Rainbow Municipal Water District

Ramona Municipal Water District

The Water Authority is highly dependent upon Colorado River water supplies, with the river historically providing most of the region's total water supply. The importance of Colorado River to the Water Authority further increased with the execution of the Quantification Settlement Agreement in 2003, which included the Water Authority's water transfer with the Imperial Irrigation District and the lining of the All American and Coachella canals. These projects will supply about 30 percent of the Water Authority's total water supply by 2020.

Rincon del Diabolo Municipal Water District

San Dieguito Water District

Santa Fe Irrigation District

South Bay Irrigation District

Vallecitos Water District

Valley Center Municipal Water District

Vista Irrigation District

Yuma Municipal Water District

The Basin States Alternative resolves a number of outstanding problems of river management, described in the DEIR, by using a consensus-based set of operating guidelines and agreements among the seven Colorado River Basin states. The agreements are necessary to ensure that plans for storing and delivering drought-year supplies can be implemented, and for resolving differences among the states regarding the allocation of supplies in a shortage year. As a result, the implementation of the sought-after guidelines can be accomplished in a relatively expeditious manner. This is important in light of the severe ongoing drought being experienced throughout the Colorado River Basin.

OTHER REPRESENTATIVE

County of San Diego

Regional Director, Bureau of Reclamation  
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The Water Authority participated in the formulation of draft agreements that would provide for the creation and release of Intentionally Created Surplus (ICS). We urge Reclamation to include this program as part of its preferred alternative. The Water Authority is the recipient of mainstream water from our water transfer agreement with the Imperial Irrigation District and from the All American and Coachella canal lining projects. Transfer water under our agreement with IID is created by extraordinary conservation and by fallowing. Delivery of conserved mainstream water to the Water Authority is accomplished under contract with the Secretary of the Interior pursuant to the Colorado River Water Delivery Agreement of October 10, 2003.

As the holder of a contract with the Secretary for delivery of mainstream water, and as the holder of conserved water that is eligible for designation as Intentionally Created Surplus, the Water Authority qualifies, under the Guidelines proposed by the seven Colorado River Basin states, to participate in the ICS program. However, we understand there may be interpretations of the Draft EIS that would question the Water Authority's ability to participate in the ICS Program. It is critical that the Final EIS and Record of Decision provide certainty that the Water Authority is fully eligible to participate in the Program. We look forward to working with Reclamation to determine the structure under which the Water Authority will participate in the ICS Program.

The Basin States' Alternative meets the Secretary of Interior's goals for addressing limited water availability during times of low reservoir conditions and substantially improves the predictability of water supplies. The Water Authority urges you to select the Basin States' Alternative as the preferred alternative in the Final Environmental Impact Statement and the selected action in the Record of Decision.

Sincerely,



Maureen A. Stapleton  
General Manager