>>> "Nancy Messer" <nancy@ed-3.org> 04/27/07 03:30PM >>>
Ms. Harkins:

Attached for your records is a scanned copy of the letter mailed out today to your attention regarding SCWPDA's comments regarding the Draft Environmental Impact Statement, Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead ("Draft EIS").

Grant R. Ward

General Manager

Santa Cruz Water & Power District's Association (SCWPDA).

Nancy Messer

Executive Assistant to Grant Ward, General Manager

ED3 & MSIDD & SCWPDA

41630 W. Louis Johnson Drive

Maricopa, AZ 85239

Office 520.876.4982 or 520.424.9021 or 520.424.3344

Fax 520.424.3281

nancy@ed-3.org

SANTA CRUZ WATER & POWER DISTRICTS ASSOCIATION

41630 W. Louis Johnson Dr., Maricopa, AZ 85239
Phone (520) 876-4982 • Fax (520) 424-3281

Central Arizona Irrigation and Drainage District
Maricopa-Stanfield Irrigation and Drainage District
Electrical District No. 3
Electrical District No. 4

Dan Thelander, President
Bryan Hartman, Vice-President
DeWitt Weddle, Vice-President
Mark Hamilton, Secretary/Treasurer
Grant R. Ward, General Manager
Paul R. Orme, General Counsel

April 27, 2007

Ms. Jayne Harkins, Acting Regional Director
U. S. Bureau of Reclamation
Lower Colorado Region
Attn.: BCOO-1000
P. O. Box 61470
Boulder City, NV 89006-1470

RE: Santa Cruz Water & Power Districts Association's Comments Regarding the Draft Environmental Impact Statement, Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead ("Draft EIS")

Dear Ms. Harkins:

The purpose of this letter is to provide comments on the above referenced Draft EIS. The Santa Cruz Water & Power Districts Association (SCWPDA) consists of two irrigation districts and two electrical districts, which combined represent over 200,000 acres, all located in Pinal County, Arizona. The two member irrigation districts (Maricopa-Stanfield Irrigation & Drainage District and Central Arizona Irrigation & Drainage District) are the largest Central Arizona Project ("CAP") agricultural excess water contractors, and together are allocated more than 50 percent of the 400,000 acre foot CAP Agricultural Pool.

SCWPDA's concerns about the Colorado River Interim Shortage Guidelines in general, and the Draft EIS in particular, stem from the vulnerable position of its member irrigation districts to Colorado River Lower Basin shortages. Given CAP's lower priority with respect to California, and agriculture's lower priority within the CAP, these shortage concerns are self-evident. For this reason, SCWPDA was an active participant in the Arizona Department of Water Resources Director's Shortage Sharing Workshop which led to Arizona's contribution to the Basin States Alternative set forth in the Draft EIS. Consequently, SCWPDA urges that Reclamation adopt the Basin States Alternative as the Preferred Alternative in the final EIS and Record of Decision.

Of the various alternatives considered in the Draft EIS, the "Reservoir Shortage Alternative" is of most concern to our Districts. This Alternative would clearly violate Article IV (b) of the Colorado River Compact which subordinates the impoundment of water for generation of electrical power to direct consumption of water for "agricultural and domestic purposes". The proposed cuts to Lower Basin water supplies would have an enormous negative impact on CAP agriculture.

SCWPDA supports the official comments of ADWR Director, Herbert R. Guenther, on the discussion of the various alternatives discussed in the Draft EIS and will not elaborate further on these comments. In addition, SCWPDA supports the anticipated comments of the Arizona Municipal Water Users Association ("AMWUA") and the Colorado River Energy Distributors Association ("CREDA). We support CREDA's views that power users should not be required to fund non-power water conservation programs such as is suggested in the Conservation Before Storage Draft EIS Alternative.

In conclusion, SCWPDA supports the Basin States Alternative as the Preferred Alternative to be adopted in the final EIS and Record of Decision.

Sincerely,

Grant R. Ward
General Manager

c: Robert W. Johnson, Commissioner, U. S. Bureau of Reclamation
Rick Gold, Regional Director, U. S. Bureau of Reclamation, Upper Colorado Regional Office
Larry Walkoviak, Deputy Regional Director, U. S. Bureau of Reclamation, Lower Colorado Regional Office
Herbert Guenther, Director, Arizona Department of Water Resources
Sid Wilson, General Manager, Central Arizona Water Conservation District
Leslie James, Executive Director, Colorado River Energy Distributors Association
Steve Olson, Executive Director, Arizona Municipal Water Users Association