

## **Comments Submitted By Business Groups**

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This section contains comment letters submitted by the following business groups:

B-1    Avalex Inc.



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. 1

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. 2 3

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. 4

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. 5 6

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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.

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Thank you for considering these comments.

Sincerely,

*/s/ Craig W. Morgan*

Craig W. Morgan, P.E.  
Principal Engineer  
Avalex Inc.

Cc: Michael Abatti  
James Abatti

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## Reponses to Comment Letter B-1

### B-1-1

Your comment is noted. The Executive Summary (Section ES 2.10) has been modified to more clearly summarize the results of the electrical power resources analysis (Section 4.10).

### B-1-2

Reclamation does not concur with this comment. The action alternatives were developed to include different formulations of each of the four operational elements. The Water Supply Alternative was developed to analyze a scenario that would maximize water deliveries at the expense of retaining water in storage in the reservoir for future use (see description of Water Supply in Section 2.5 of the EIS).

### B-1-3

Reclamation does not concur with this comment. Under NEPA, the No Action Alternative represents a projection of current conditions to the most reasonable future responses or conditions that would occur during the life of the proposed federal action without any action alternative being implemented (Section 2.2.2). Therefore, since a mechanism for the storage and delivery of conserved water currently does not exist, it would be inappropriate to include this in the No Action Alternative.

### B-1-4

The information requested is provided in the EIS. Please refer to Section 2.2.2 of the EIS which explains the assumptions of how the distribution of water under Stage 1 and Stage 2 shortages is determined.

### B-1-5

The information requested is provided in the EIS. Please refer to Section 2.2.2, Section 4.2, Appendix A, and Appendix G of the EIS for detailed explanations on the assumptions of how the distribution of water for Arizona under shortage conditions is determined.

### B-1-6

The information requested is provided in the EIS. Please refer to Section 2.2.2, Section 4.2, Appendix A, and Appendix G of the EIS for detailed explanations on the assumptions of how the distribution of water for California and Nevada under shortage conditions is determined.

**B-1-7**

The information in the Draft EIS has been modified in the Final EIS (Section 4.16). More detailed information regarding the proposed SNWA projects has been included in Section 4.16 of the Final EIS and can also be found on SNWA's website at the following internet address:

[http://www.snwa.com/html/wr\\_instate.html](http://www.snwa.com/html/wr_instate.html)

**B-1-8**

A description of the Systems Conveyance and Operations Program (SCOP) is provided in Section 4.5.2 and in Section 5.1.25 of the EIS. Additional information on the SCOP can be found at the Clean Water Coalition's website at the following internet address:

<http://www.cleanwatercoalition.com>

**B-1-9**

The proposed SNWA water supply proposals are assumed to occur under the Basin States, Conservation Before Shortage, and Reservoir Storage alternatives, and under the Preferred Alternative, due to the assumed existence of a storage and delivery mechanism. Under the SCOP EIS preferred alternative, impacts to water quality are considered insignificant for Lake Mead elevations down to 1,000 feet msl (Section 4.5.2). For the Preferred Alternative (Section 4.3.4, Figure 4.3-24) under the assumptions described in Section 4.2, the probability of Lake Mead elevations below 1,000 feet msl is zero over the interim period.