



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

December 3, 2007

Robert W. Johnson
Regional Director
Lower Colorado Region
Bureau of Reclamation
Attn: BC00-1000
P.O. Box 61470
Boulder City, NV 89006-1470

Subject: Final Environmental Impact Statement (FEIS) for Lower Basin Shortage Guidelines and Coordinated Management Strategies for Lake Powell and Lake Mead Under Low Reservoir Conditions, Lower Colorado River Basin (CEQ # 20070461)

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Bureau of Reclamation (Reclamation) on April 30, 2007. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because of concerns with potential adverse effects to beneficial uses and the need for additional information regarding the effects of climate change, banking of conserved water, and monitoring.

EPA noted our support for the overall approach of the Conservation Before Shortage and the Basin States alternatives. The Preferred Alternative in the FEIS incorporates operational elements from these alternatives, including the promotion of water conservation in the Lower Basin through the Intentionally Created Surplus (ICS) mechanism. We understand that water banking will be maximized by allowing the Secretary of the Department of the Interior the flexibility to approve other users to utilize this bank, including Mexico. We also understand that monitoring and adaptive management is implicit in the interim guidelines included as Appendix S of the FEIS.

The FEIS details Reclamation's approach regarding the effects of climate change on Colorado River water management and acknowledges that decreased mean annual flow and increased variability, including more frequent and more severe droughts, may occur. The preferred alternative guidelines, which will be in effect for the next 19 years, will provide Reclamation the opportunity to gain operating experience for the management of Lake Powell and Lake Mead in low reservoir conditions. The preferred alternative enhances conservation opportunities in the Lower Basin, and includes

elements that would respond to potential impacts of climate change, including a shortage strategy at Lake Mead. The FEIS also documents Reclamation's substantial research and development efforts and partnerships regarding the potential impacts of climate change and variability on the Colorado River.

In our comments on the DEIS, EPA encouraged Reclamation to provide a detailed toolkit of supply and demand management measures in the FEIS to facilitate water management flexibility and to provide a resource for Colorado River water providers. Reclamation responded that most state and local agencies already have or are preparing water resources management plans or drought management plans. As the principle agency for managing Colorado River water supplies, we continue to encourage Reclamation to play an active role in facilitating comprehensive water management among all water sectors in the Basin.

EPA has no objections to the proposed project and appreciates the opportunity to review this FEIS. When the Record of Decision is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me or Karen Vitulano, the reviewer of this document, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/s/

Nova Blazej, Manager
Environmental Review Office