

Bcc: R. Wolfe                      S. Liang  
G. Johnson                      J. Matusak  
M. Stewart                      L. Palencia  
W. Lieu                          J. Harriger  
C. Baynes                      Environmental Planning Files

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FEDERAL EXPRESS

SCOP EIS Project Manager  
PBS&J  
2270 Corporate Circle, Suite 100  
Henderson, NV 89074

To Whom It May Concern:

Preliminary Draft Environmental Impact Statement  
for the Clean Water Coalition Systems Conveyance and Operations Program

The Metropolitan Water District of Southern California (Metropolitan) has reviewed a copy of the Preliminary Draft Environmental Impact Statement (EIS) for the Clean Water Coalition Systems Conveyance and Operations Program (SCOP). The lead agencies for this project are the National Park Service and Bureau of Reclamation. The EIS analyzes the potential impacts resulting from the construction and implementation of the SCOP, which would be a system of pipelines and tunnels that discharges highly treated effluent to an alternative location in Lake Mead. The SCOP system would be designed to collect the treated effluent flows from the three treatment facilities, for conveyance to an area in the lower Colorado River system, while the majority of the flows bypass the lower Las Vegas Wash. The SCOP would be located in Clark County, Nevada, and would include activities and infrastructure located on lands owned and/or managed by the City of Las Vegas, Clark County, City of Henderson, U.S. Bureau of Land Management, U.S. Bureau of Reclamation Lower Colorado Region, and National Park Service. In addition to the Proposed Action, the EIS analyzes the potential impacts of three alternatives, including a No Action Alternative. Metropolitan is providing the following comments on the Preliminary Draft EIS as a cooperating agency.

Inadequate Analysis of Potential Surface Water Quality Impacts to Downstream Users

Although the document provides modeling results at the Hoover Dam discharge location for the no action alternative and the two action alternatives, the modeling results are simply compared to water quality standards in Lake Mead to determine whether or not surface water quality impacts are significant or not. A comparison of effluent concentrations to Lake Mead standards does not address impacts to downstream users. Metropolitan requests that the modeling results from the

Hoover Dam discharge location be carried forth in the EIS to determine what impacts will result downstream in Lake Mohave and Lake Havasu.

#### Increase in Phosphorus Loading May be Significant Downstream

Modeling results for both the Boulder Islands and the Las Vegas Bay alternatives with effluent flows of 300 million gallons per day (mgd) and lake levels at both 1,178 feet and 1,000 feet show that total phosphorus will increase to 0.01 mg/L at Hoover Dam, which is double the baseline concentration of 0.005 mg/L. This appears to be a significant increase, and impacts downstream may also be significant. In support of this, the document states on page 2-55 “ The additional load from an effluent discharge below Hoover Dam is likely to be passed relatively unchanged to the downstream reservoir (Lake Havasu).”

Additionally, the document states “phosphorus loading through the Hoover Dam discharge would not increase above pre-project (pre-2002) levels....Therefore, impacts from the Boulder Islands alternative would be insignificant and negligible.” It is difficult to find this statement accurate, as no historical water quality information was provided. It is unclear what “would not increase above pre-project (pre-2002) levels” means. The modeling results show that the total phosphorus at Hoover Dam will increase to 0.01 mg/L under both action alternatives, and although 0.01 mg/L may be less than historical highs measured at Hoover Dam, there may be downstream effects with a sustained higher level of total phosphorus, which will result with the implementation of both action alternatives.

Nutrient conditions in Colorado River water are such that the system is phosphorus limited. Therefore, any increase in baseline phosphorus concentrations may increase productivity in Lake Mohave, and further downstream within Metropolitan’s system such as the Colorado River aqueduct, and our terminal reservoirs that receive Colorado River water. Subsequent effects of increased productivity are algal blooms, algal toxins, and an increase in organic carbon, which in turn, challenges our ability to comply with drinking water standards related to disinfection byproducts.

Metropolitan requests that the lead agencies reassess the conclusion regarding the significance of increased phosphorus loads, particularly in the context of agencies that divert or pump Colorado River water downstream and convey it for subsequent use as drinking water.

### Mass Loading from Increased Effluent Flows Not Addressed

For each alternative, modeling results of selected constituents are compared to baseline concentrations at various locations within Lake Mead to determine the significance of the impact. However, the document does not address mass loading. Additional analysis should be conducted, and should calculate baseline mass loading (lbs/day) and compare that to mass loading for 2030 and 2050 effluent flows at the various locations within Lake Mead for each alternative.

Further, Metropolitan disagrees with the statement that “A beneficial impact of the Boulder Islands and Las Vegas Bay alternatives is that effluent-related constituents would undergo more dilution than under existing conditions or the No Action Alternative.” While it is true that effluent-related constituents would undergo more dilution, this is not necessarily beneficial, as mass loading will increase and these loads will be placed closer to the discharge point from Hoover Dam.

### Baseline Surface Water Quality Data is Limited

Section 3.1.3 (Surface Water Quality) states that water quality data from 2002 is used as the water quality baseline in this EIS. It is inappropriate to evaluate project-related impacts with one year of baseline data, especially for a project that is long lasting. A longer time period of baseline data should be incorporated. Metropolitan suggests comparing ten years of baseline data versus project-related impacts for all constituents.

### Unknown Why Additional Treatment is Not Considered an Alternative

The National Environmental Policy Act requires that an “EIS must rigorously explore and objectively evaluate the reasonable range of alternatives. If alternatives have been eliminated from detailed study, the EIS must briefly discuss the reasons for their elimination.” (40 C.F.R. 1502.14[a]) Metropolitan requests that the EIS include additional treatment as an alternative or explain why additional treatment was not included as an alternative considered but eliminated. Section 4.11.4 (Socioeconomics Mitigation) states that “under the no action alternative, the treatment processes needed to ensure compliance with water quality standards would cost approximately \$725 million dollars.” This text implies that water quality objectives could be met through changes to effluent treatment processes. It would be helpful to understand what types of treatment improvements this consists of. Metropolitan requests that the environmental consequences of alternative treatment processes versus the proposed action alternatives be evaluated and the benefits to receiving water and entitled water users be evaluated.

No Information on Pathogens and Total Organic Carbon; Limited Information on Xenobiotics and N-Nitrosodimethylamine (NDMA)

These constituents are of concern to drinking water utilities. Little to no information has been provided in regards to modeling results for these constituents, as well as their concentrations in Lake Mead or in wastewater effluent. Metropolitan requests that additional analysis regarding these constituents be included in the EIS.

Analysis of Hazardous Materials Impacts Inadequate

The document states that hazardous materials may be present along the proposed alignment, particularly in the vicinity of two historical Recognizable Environmental Conditions (RECs), the Three Kids Mine and the Henderson landfill. It is noted that these RECs have known metal and petroleum contamination from historical mining and landfill operations, respectively. Although construction would not be in direct contact with these facilities, this does not mean that impacts from hazardous materials would be negligible. Further analysis of this issue is needed, and the geology and hydrogeology of the site must be considered in the analysis.

Additionally, Metropolitan suggests considering additional alternative alignments for the South Lateral pipeline. Metropolitan is concerned that the excavation may provide a flow path for perchlorate contaminated groundwater to reach the Las Vegas Wash. This could result in a significant mass loading increase of perchlorate to Lake Mead. Although current remedial efforts have been successful in reducing the mass loading to Lake Mead, it is of utmost importance to allow the remediation efforts to continue unhampered.

We appreciate the opportunity to participate in the development of this EIS as a cooperating agency and we look forward to receiving future environmental documentation on this project. If we can be of further assistance, please contact Ms. Leslie Palencia at (909) 392-5431 or me at (213) 217-6242.

Very truly yours,

Laura J. Simonek  
Manager, Environmental Planning Team

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(Public Folders/EPU/Letters/11-JAN-05C.doc – PBS&J)