COMMENTS ON 12-29-94 TROA ALTERNATIVES MATRIX

Thanks for helping us to continue to move forward in developing TROA EIS/EIR Alternatives. As discussed at the list EIS/EIR Management Team meeting, here are a few comments on the matrix you passed out at the meeting. They primarily cover ensuring the alternatives are feasible to implement.

A. Water Rights - 1. Provides for existing water rights and Credit Waters.

Instead of "yes", the matrix elements could be: "same as future without TROA".
Add another row on how to represent new water rights in each alternative.
Add another row on how to represent changes in water rights in each alternative.

Discussion: At a EIS management team meeting, Jeff Zippin suggested we do not need to hold all water rights holdings inviolate in the EIS/EIR. We then generally agreed that to not infringe on any water rights would leave so little water for other uses as to make the alternatives indistinguishable from each other. Is this no longer thought to be true, perhaps based on Chet's model runs? Otherwise, we may want to follow this with a list of water rights which are reasonably possible to cut, e.g. Floristan Rate water. Also, the "future without TROA" alternative is based on changes in existing water rights, e.g. SPPC acquiring irrigation rights. This doesn't cover how to handle new applications for water rights.

B. Instream Flow

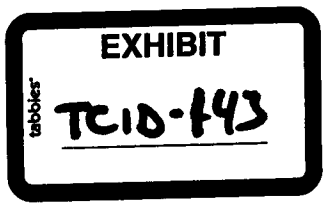
In regard to he use of excess California's surface water, P.L. 101-618 states: "there is allocated to the State of California the right to divert or extract ... subject to ... maximum annual diversion of surface supplies shall not exceed 10,000 AF ...." While water can be diverted to storage for recreation, under California water law, it is highly unlikely that the California State Water Board would allow a right to use any part of the 10,000 AF for maintain instream flows, or for that matter, to convert it for use in Nevada, as fish water or otherwise. The most likely interpretation is that it is a cap on the amount of water that can be put to a beneficial use after minimum instream flows are met. However, the public trust doctrine with regard to instream flows is still poorly defined. Any unused water, which flows into Nevada, is subject to the water rights laws in Nevada. Those with a lower priority than California's may sue to exercise their rights to this water even if California agrees to give it to them, since California may not have that authority.

For Doug only, Chuck Rich also suggested it would be better for us to have negotiated a consumptive use amount, such as 5,000 AF/year rather than a total use amount.

Ramping of instream flows is not covered. This could be put as row "B-6", B-5 being flows along side hydro-plant diversions..

C. Recreational Pools

Why not include Donner Lake with the other reservoirs, since water may be traded to increase Donner, and a minimum pool there is already allowed in the model.



E. California Water Allocation - 1. M&I demand scenarios

The expected Scenarios is 14,858 AF groundwater and 1,200 AF surface water. Shouldn't this read 17,600 AF groundwater and 2400 AF surface water [the 1200 was changed but not the 14,858? Why not place these numbers in individual columns where they can be changed if warranted [this was done before asked]?

E. California Water Allocation - 3. Storage of California surface M&I water in Federal reservoirs

Alternative 6 (California M&I) should have Project and Credit Waters be not adverse to California's surface water allocation. A case can be made for this based on the rationale behind building Prosser and Stampede Reservoir.

Hi,

I've been reviewing the files for the Calfirm TCmodel run, and there seems to be a major problem.

There's two NRUNDATA files in the ".../drafteis" directory, "calfirm.in" dated 6-5-95 and "calfirm.in.2" dated 6-1-95. The latter seems to incorporate the latest decisions on the California Assured Storage Alternative: 50,000 AF max storage and the lower (current) mimimum instream flows. However, the former (12,000 AF max storage and DFG suggested minimum instream flows) seems to have been used as input to the Calfirm TCmodel run. The only part of the former (6-5-95) file I believe should have been used is the "instream flow targets" for the reservoirs in California, since instream flows are still an objective in the alternative albeit without those minimums suggested by DFG (but this wasn't discussed when we were last formulating the Calfirm alternative).

Below is a comparision showing the differences between the two NRUNDATA files. Maybe I'm missing something here as I don't know much about how the runs were made. But I think you should take a look at this.

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40 VALUES OF "KALT" WITH I3 SPACING

both:	0	2	2	0	1	0	1	0	1	1	0	0	1	0	1	0	0	0	1	0
6-5:	0	0	1	1	0	1	0	2	0	0	1	1	1	1	1	0	0	0	0	1
6-1:	0	0	1	1	0	1	0	3	0	0	1	1	1	1	1	0	0	0	0	1

^

2 is mandatory
3 is targeted

40 VALUES OF "KAL2" WITH I3 SPACING x

both:	0	0	1	0	0	0	2	1	0	0	0	0	0	1	0	0	1	1	0	0
6-5:	0	0	0	0	0	0	0	1	0	0	2	0	2	1	0	1	1	0	0	0
6-1:	0	0	0	1	0	0	0	1	0	0	2	0	2	0	0	0	1	0	0	0

20 VALUES OF "KAL3" WITH I3 SPACING

6-5:	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
6-1:	2	0	1	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0

CALIFORNIA RESERVOIR STORAGE LIMITS

6-5:	0	0	1.5	0	0	12.0	0	12.
6-1:	0	0	5.0	0	0	60.0	0	60.0

INSTREAM FLOW TARGETS

6-5:	75	75	75	75	75	75	75	75	75	75	
	75	75 INS 1									
6-1:	50	50	50	50	50	50	70	70	70	70	
	70	70 INS 1,2									

6-5: 15 15 15 15 10 10 30 30 30 30
10 10 INS 2
6-1 3 3 3 3 3 3 3 3 3 3
3 3 INS 2,2

6-5: 15 15 15 15 10 10 30 30 30 30
10 10 INS 3
6-1: 5 5 5 5 5 5 5 5 5 5
5 5 INS 3,2

6-5: 10 10 10 10 10 10 10 10 10 10
10 10 INS 4
6-1: 2 2 2 2 2 2 2 2 2 2
2 2 INS 4,2

6-5: 40 40 40 40 40 40 40 40 40 40
30 30 INS 5
6-1: 30 30 30 30 30 30 30 30 30 30
30 30 INS 5,2

6-5: 100 100 100 100 100 100 200 200 200 200
200 200 INS 6
6-1: 0 0 0 0 0 0 0 0 0 0
0 0 INS 6,2

6-5: 100 100 100 100 100 100 100 100 100 100
100 100 INS 7
6-1: 0 0 0 0 0 0 0 0 0 0
0 0 INS 7,2

6-5: 250 250 250 250 250 250 250 250 250 250
250 250 INS 8
6-1: 0 0 0 0 0 0 0 0 0 0
0 0 INS 8,2

6-5: 30 30 30 30 30 30 40 40 40 40
30 30 INS 9
6-1: 0 0 0 0 0 0 0 0 0 0
0 0 INS 9,2

MINIMUM FLOW IN INFLOW TO PYRAMID LAKE

6-5: 240 240 240 240 240 240 240 320 480 415
400 280
6-1: 0 0 0 0 0 0 0 0 0 0
0 0