



SOUTHERN NEVADA WATER AUTHORITY

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ORIGINAL

June 3, 2008

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

FILED
SECRETARY OF THE
COMMISSION
2008 JUN 11 P 3:00
FEDERAL ENERGY
REGULATORY COMMISSION

Re: Lake Powell Hydroelectric System Project No. 12966-002

Dear Ms. Bose:

On behalf of the Southern Nevada Water Authority, I am writing with regard to the request for information contained in Scoping Document No. 1, and in anticipation of the initial scoping meetings to be held in Kanab, Cedar City and St. George, Utah on June 10-12, 2008. We will be submitting further information following these meetings. However, I wanted to take this opportunity to raise some initial concerns.

The Scoping Document acknowledges FERC's limited jurisdiction over the project, and the fact that numerous state, federal and local agencies and Indian Tribes have jurisdiction over or will be affected by the project. As a result, the Commission intends to enter into a Memorandum of Understanding (MOU) with each of the agencies that need to authorize the project, to insure a single process and to assure the scope of the environmental analysis can expand from the hydro system to include the entire pipeline project.

We reserve the right to comment further on the adequacy of this proposed process, but initially we question the Commission taking the lead in the environmental analysis, as opposed to the Department of the Interior. As you are aware, Interior has numerous agencies such as the Bureau of Land Management, Fish and Wildlife Service, Park Service, and Bureau of Reclamation that have direct jurisdictional authority and expertise over the primary purpose of the project – to deliver a water supply to an extensive area in Southern Utah. The Commission clearly lacks the broad expertise of other agencies to act as lead agency in a complex water supply project that will affect an entire geographic region of the West.

SNWA MEMBER AGENCIES

Big Bend Water District • Boulder City • Clark County Water Reclamation District • City of Henderson • City of Las Vegas • City of North Las Vegas • Las Vegas Valley Water District

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The narrow scope of the Commission's focus is illustrated by a startling statement at page 11 of the Scoping Document that "we have not identified any resources as potentially cumulatively affected by construction and operation of the Lake Powell Pipeline Project." Although the document appears to acknowledge socioeconomic impacts from the construction and operation of the project, it should be obvious that there will be significant cumulative impacts associated with the transbasin importation of water. These effects include induced growth and related issues of transportation, energy, and *impacts on lands and water resources in and surrounding the areas to be served.*

The project will also have broader regional impacts. For example, the project will cause a significant annual depletion of water from Lake Powell. This will affect the water supply of all seven states that depend on the Colorado River system reservoirs for the management and delivery of water supply. The socioeconomic and environmental effects will in some measure affect all users of water in the system, and may exacerbate shortages in the system. In 2002, water levels in Lake Powell approached critical elevations. The environmental analysis should address not only the security of the water supply to the proposed pipeline, but the direct and cumulative impacts to water supply, availability and management and hydroelectric power generation at Glen Canyon Dam to the other states and entities that depend on the Colorado River, including the Southern Nevada Water Authority.

Finally, the Scoping Document identifies a narrow list of alternatives: (1) Utah's proposed action, (2) staff's and other modification of the proposed action, and (3) no action. This list of alternatives presumes the project is the only source of supply for water to serve anticipated growth. As such, the alternatives list appears deficient.

The Southern Nevada Water Authority will be providing additional information and comments as this process moves forward.

Sincerely,



Patricia Mulroy
General Manager