



**SOUTHWEST GAS CORPORATION**

April 4, 2003

received  
4-9-03  
Postmarked  
4/4/03 gllm

Commission Chairman Earl Eisenhower  
Arizona Navigable Stream Adjudication Commission  
1700 West Washington, Room 404  
Phoenix, AZ 85007

Re: Lower Salt River

Dear Commission Chairman Earl Eisenhower:

Earl:

Southwest Gas Corporation provides natural gas distribution services to over 800,460 Arizona customers. As a native Arizona utility with extensive operations especially in Maricopa County, we have numerous needs for easements and rights-of-way to serve our customers.

We are very concerned with the implications of an adverse decision regarding the navigability of the lower Salt River. The dysfunctional impact of literally thousands of pieces of private property reverting to State jurisdiction in an area as heavily urbanized as this would be potentially staggering. At a minimum, our ability to grow, to serve and to provide safe and economical service would be put very much at needless risk.

We urge a finding consistent with the long standing use and decades long development of the Phoenix metropolitan area that has, conceptually, no discernable relationship to the deep, regularly flowing rivers typical of eastern states. That the river was virtually non-flowing at the time of statehood and is essentially never flowing now is our everyday fact of life.

We appreciate this opportunity to submit our comments and urge you finding that the lower Salt River is indeed "non-navigable."

Respectfully submitted,

Richard L. Foreman  
Manager, Public Affairs  
Southwest Gas Corporation

RLF:lt

c James F. Lowman, Senior Vice President  
Southwest Gas Corporation

Maricopa County, Lower Salt River  
03-005-NAV  
4/7/03

Evidence Item No. 044