APPENDIX D — Summary List of Comments

APPENDIX D Summary of Comments

Purpose and Need
Clearly identify the purpose and need for the project
• Use geographic and economic demand forecasts to show a defensible need for the Firming Project
• Broaden purpose and need to include the firming of Middle Park Water Conservation District water rights
• Use demand forecasting that accounts for regional economic growth activity and subsequent future growth versus the land use/build out projections to determine need
Conduct a complete and full independent evaluation of the purpose and need
• Concern about whether there is a legitimate need for this water and whether the Firming Project is economically viable
• The Firming Project will not promote growth, it will only firm up an existing source of water
Analyze impacts of the increased populations in the demand forecast
• Are Participants considering selling Windy Gap Firming water as a source of revenue? Is this within their charters and consistent with state statutes?
• Clearly define water supply "reliability" (linking reliability in extraordinary dry years could lead to unnecessary cost-effectiveness and social/environmental impacts?)
Conduct a thorough assessment of water supply shortages
 Concern that Firming Project water yield projections are incorrect (original shareholders were promised 100 acre-feet/year/unit and yield only averaged 17 acre-feet/year/unit)
• Concern that the existing purpose and need relies on use of inflated projections for future water demand by failing to link future urban water use with decreasing agricultural use
• Concern that Longmont's projected water supply deficit would disappear if the city would factor in the city's Raw Water Requirement Policy's requirement that a full three acre-feet of water be transferred to the city of every acre annexed
Describe current build-out boundaries and estimated demand for Participants
Determine an optimal population for the Front Range
• Does the City of Longmont have a legitimate need for this water?
• Does the Platte River Power Authority have a real or legitimate need for this water?
• Do local population forecasts exist that justify Platte River Power Authorities claims that demand for electricity will more than triple in the foreseeable future?
• Examine whether Municipal Subdistrict users are re-using their Colorado River water to extinction
• Factor in Congressional objectives for C-BT facilities as set forth in SD 80
• Has the Platte River Power Authority accounted for the comparatively lower cost of electricity generation from wind power generators than coal-fired generators in its projected water supply needs?
• Incorporate lessons learned from the 2002 drought year to quantify water availability from the Colorado River Basin
• Include an explanation and assessment of the chosen demand projection methodology

- Perform a demand forecast for each Participant, not just project as a whole
- Perform a study on drought conditions and water supply in 2002
- Platte River Power Authority should take into account the inevitable decrease in fossil fuel use (due to global warming) and factor this into its projected need for additional water supplies
- Purpose and need should be expanded to explain the broader delivery objectives of NCWCD
- State a purpose and need for each participant that is supported by facts and by legitimate public needs
- Update purpose and need to include maintaining the environmental health of affected river basins and wildlife habitat
- Use consistent measurements for comparing water usage

Water Conservation

- Analyze the role of conservation in delaying and reducing the need for the Firming Project
- Focus on water conservation measures
- Consider re-use of Windy Gap water to determine if there is a need for additional water
- Need a more in-depth study on water conservation
- Quantify and discuss water conservation measures already in place and measures planned for the future
- Conservation programs should be mandatory as part of the project
- Include per capita water use of the participants and the extent to which conservation improvements could lower demand projections
- Conservation programs do not constitute a reasonable No Action alternative
- Cite the amount of money Participants spent on conservation in 2002
- Compare cost/af of storage vs. cost/af of 2002 conservation efforts
- Consider "engaged conservation," which is an ongoing conservation program that adapts to changing water needs over time through a variety of conservation efforts
- Consider the potential reduction in delivery system loss by Participants
- Improve efficiency of existing reservoirs first
- Legalize catch systems on private houses that allows collection of stormwater and reduces water demand
- Show the actual amount of water conserved by each Participant in 2002
- Upgrade conveyance infrastructure to reduce water loss

General Alternatives

- Discuss total costs and any future financing necessary to implement the Firming Project for each Participant
- Concurrently incorporate the 404(b)(1) Guidelines on alternative analysis during the NEPA process, not after
- Concern about the systems set in place to fund this project and the potential for disruption of funds (i.e., the public will not approve funding the Firming Project once they know where the money will be going)
- Excluding alternatives should not be left up to the project proponent
- Disclose the impact and timeline of all construction activities

- Discuss cost projections for the Firming Project while accounting for times when no water will be delivered but in which the annual project cost remains constant
- Discuss cost projections by factoring in the per-acre foot costs of low yield possibilities
- Evaluate operational and maintenance requirements of any entities involved within 4 miles of Little Thompson and Chimney Hollow
- How would reservoirs be operated and maintained within 4 miles of the Little Thompson and Chimney Hollow Reservoir sites? (including hours of operation, number of personnel, housing, vehicles, and costs)
- Consider the long-range relationship between Colorado Front Range land use policies and water availability as part of the alternatives analysis
- Incorporate sustainable water management for all alternatives
- Select the least expensive, least environmentally and socially harmful alternative
- Locate reservoirs on the East Slope
- Specify the lifespan of each proposed reservoir
- Discuss how long it would take to fill reservoirs
- Select an alternative with the fewest impacts on people and wildlife
- What would the rate of growth have to be for each participant to service the debt generated from financing it's portion of the Firming Project (as in the case of the Erie Enterprise Fund) and what if the growth rate slows?
- Design Little Thompson to produce hydro-electric power

Preliminary Alternatives

- Eliminate the Little Thompson site from further consideration and select another site
- The Subdistrict's exclusion criteria should have disqualified Little Thompson Reservoir site from further consideration
- Locate a reservoir at Chimney Hollow not Little Thompson
- Concern that the Little Thompson Reservoir buffer zone is inaccurate and maximum precipitation events would threaten more properties than expected
- Construct a reservoir at Chimney Hollow and a scaled down Little Thompson reservoir
- If a scaled down Little Thompson reservoir is constructed the Subdistrict should meet with the five landowners at < 5450 feet elevation mark and develop purchase options for the land
- Expressly state whether the proposed project will not include prepositioning of C-BT water
- Discuss the cost savings and benefits of implementing the No Action alternative
- Eliminate the Jasper Reservoir site from further consideration
- The amount of storage needed to firm up Windy Gap water will change significantly based on which project is ultimately selected by Denver Water and permitted by the Corps

New Alternatives

- Consider non-structural alternatives and discuss their apparent ineffectiveness if needed
- Investigate an alternative consisting of small capacity elements, non-structural options, conservation, and project phasing either as stand alone or a component of an altenative
- Firm up an additional 3,000 acre-feet owned by the Middle Park Conservancy District
- Expand storage capacity of existing reservoirs prior to developing new water storage facilities

• Plan and coordinate water supply on a regional basis • Consider water conservation, increased water efficiency, or temporary water transfers during dry years • Explain why more flexible, cooperative Windy Gap C-BT operating regimes that do not cause injury to C-BT during wet-year zero firm yield are not feasible • Consider an alternative that includes a Chimney Hollow/Dry Creek site along with the Broomfield site Consider delivering Denver Water's deliveries to Broomfield via the Windy Gap C-BT system • Consider interruptible supply contracts, possibly in conjunction with a Platte River water bank • Consider supply side efficiency (e.g., reuse, aquifer storage, interruptible supply, and coordination with other providers) • Consider pocket dams on the East Slope instead of new large reservoirs • Consider storage on the Platte River below Denver that would allow full reuse of Windy Gap and other reusable effluent that could be exchanged for the right to reuse C-BT supplies higher in the system • Dedicate space now available in Horsetooth Reservoir for Windy Gap use • Discuss whether an alternative can address inter-agency agreements, such as ones that reduce impacts by keeping water in its original watershed and selling or leasing unused shares of Windy Gap water to downstream users on the Colorado River • Disclose why the availability of existing Front Range storage is not a reasonable alternative to the construction of new storage as described in the original conclusions of the Windy Gap FEIS • If a smaller Little Thompson reservoir is proposed, then evaluate environmental and social impacts for the existing Little Thompson alternative (since it may be expanded) • Include a wide range of alternatives • Include other viable sites in the alternatives analysis, including some that were eliminated earlier • Independently re-examine both the non-structural and structural alternatives • Locate reservoirs within the communities that demand the water • Locate reservoir near the current Carter Lake/Big Thompson area to better serve the customer base • Pump the Windy Gap water through snowmaking equipment to areas high on the eastern slopes of the Continental Divide in fall, winter, and spring • Rather than store water in a constructed reservoir, use "excess" water in normal to wet years to recharge depleted natural aquifers and groundwater in the region • Reconsider a reservoir at the Broomfield site • Use the "original Jasper" site located on Willow Creek downstream of Willow Creek Reservoir rather than the northern Jasper Reservoir sites • Use borrowing, modifying the delivery schedule, and reallocating tunnel capacity to firm the yield of Windy Gap Water Resources • Summarize in-stream flow rights and by-pass flow requirements and evaluate impacts to those flows and requirements • Evaluate changes in stream flow in the Fraser River, Colorado River, and streams east of the Continental Divide

- Concern about fluctuating water elevations at Little Thompson Reservoir
- Consider changes to the operational regime of Wolford Mountain Reservoir
- Discuss any potential selling or trading of water rights that may occur
- Provide sufficient details on minimum, wet, average, and dry years as part of any hydrological analysis
- Examine relationship between existing water rights of Participants in relation to downstream rights, ecological needs, and over-appropriation issues
- Concern about decreases in water quantity in affected streams in Grand County
- Concern about how upslope storms near Little Thompson can create extreme localized storm events and the associated impacts
- Concern about loss of water at reservoirs due to evaporation
- How will increased diversions from the Fraser River reduce water available for Winter Park?
- Assess impact of flooding during spring run-off in the Colorado River Basin
- Begin baseline hydrological review by examining results of the Upper Colorado River Study
- Calculate impacts of worst case scenarios on flows and storage
- Concern about effects of exposed mud flats at Little Thompson
- Concern about raising the maximum water elevation of a reservoir at Little Thompson in the future
- Concern about changes in stream flow in the Little Thompson River
- Ensure that existing and future water supplies for West Slope water users, including exchanges and plans for augmentation, are not adversely affected
- Concern about having to add additional tertiary treatment to wastewater facilities in the Fraser and Colorado basins
- Concern about potential injury to water rights
- Consider whether actual wet water exists for this project
- Disclose impacts associated with reusing PRPA water to extinction versus not reusing water to extinction
- Disclose impacts to the 52,000 acre feet pool (SD 80 prohibits water from being diverted to the East Slope unless 52,000 acre feet is made available to the West Slope)
- Discuss precipitation amounts needed to produce projected inflow
- Discuss senior rights not currently being used that might be invoked to reduce projected supply
- Discuss whether reservoirs would be used as back-up storage for drought years or for ongoing use
- Discuss the viability of the project in hydrological terms, in that concerns have been raised to suggest that intended yield may not be sufficient under normal and drought conditions
- Evaluate impacts to future water supplies for Kremmling and Hot Sulphur Springs
- Evaluate impacts to all West Slope SD 80 beneficiaries (power and water)
- Evaluate impacts to the Colorado and South Platte River basins resulting from each of the alternatives and annual discharge for all affected streams
- Evaluate impacts to water and wastewater facilities in the Fraser and Colorado River basins
- Evaluate impacts to all affected watersheds

- Evaluate whether more than 56,000 acre-feet will be diverted per year as described in the original FEIS
- Establish a minimum water level at Little Thompson to ensure quality habitat for wildlife and protect human health from mosquitoes and other parasites
- Include agency review and comment prior to selection of stream reaches for survey and analysis
- Quantify flow requirements in the Colorado River and its tributaries for preserving the existing resources and habitat
- Use Denver's Platte and Colorado Simulation Model (PACSM), not the state's Colorado Diversion Decision Support System (CRDSS) model, to evaluate impacts

Water Quality

- Concern about water quality impacts to Lake Granby, Shadow Mountain, and Grand Lake
- Rely on the Upper Colorado River Study (UPCO) information and Three Lake Study to evaluate water quality impacts to Grand Lake, Shadow Mountain Lake, Lake Granby and to asses Three Lakes wastewater treatment discharges
- Concern about impacts to water quality in the Colorado River Basin
- Evaluate impacts to water quality from potential increases in sedimentation and nutrients
- General concerns about impacts to water quality in affected streams
- Evaluate impacts to baseline water temperatures in all affected waters
- Examine salinity in lower stretches of the Colorado River as well as the Lower Basin
- Determine baseline nutrient loads and future nutrient loading in reservoirs
- Concern about aggravating water quality in the Fraser River Basin
- · Concern about increased amounts of selenium and salinity in affected streams
- Determine whether there will be any changes in water quality classifications in Grand County streams
- Assess impacts of from sedimentation, siltation of reservoirs, and nutrient flow
- Account for seasonal alterations in reservoir water levels when assessing water quality impacts
- Analyze changes in East and West Slope concentrations and total loadings of nutrients and other constituents in affected rivers and streams
- Characterize baseline water quality monitoring in Windy Gap Reservoir using USGS detection limits and protocols used in the ongoing trophic status study of Three Lakes
- Concern about easterly flow of water through Shadow Mountain reservoir and Grand Lake
- Concern about impacts to the existing aquatic weed problem in Shadow Mountain Reservoir and Grand Lake
- Concern about water quality and streamflow impacts on the Front Range
- Concern about water pollution from motorized vehicles on and around reservoirs
- Consider reservoir design factors that affect water quality
- Consider reservoir residence times prior to pumping water through C-BT and associated effects on water quality
- Consider the State's antidegradation regulations
- Consider whether whirling disease from Windy Gap water would require a Clean Water Act permit
- Evaluate impacts caused by flooding of existing septic systems and leach fields

• Evaluate impacts to established TMDLs or to the development of new TMDLs, designated or beneficial water uses, water quality standards, and the Source Water Protection Program

• Monitor Windy Gap water quality through regular sampling

Ground Water

- Discuss impacts to ground water wells and recharge near Little Thompson
- Document existing residential wells within 4-miles of Little Thompson and Chimney Hollow
- Evaluate impacts of ground water recharge in Grand County

Physiography, Geology and Soils

- Concern about absorption of water into bedrock at Little Thompson
- Concern about impacts to unique geologic formations at Little Thompson
- Consider unstable geologic faults at Little Thompson
- Concern regarding unstable soils at Little Thompson
- Evaluate soil stability around alternative reservoirs
- Evaluate impact of geologic shift due to the weight and fluctuations of water held in Little Thompson
- Discuss impacts to stream morphology
- Evaluate impact of increased humidity caused by evaporation of surface water from reservoirs
- Changes in the operation of Green Mountain Reservoir could exacerbate the potential for landslides near Heeney
- Evaluate the risk of landslides on lands adjacent to reservoirs

Wetlands

- Inventory and evaluate impacts to wetlands at each reservoir site (include maps and regional water features)
- Examine impacts to wetlands, riparian, and aquatic vegetation along rivers and streams related to any changes in stream flow
- Concern about conflicting studies on extent of wetlands at Little Thompson
- Evaluate impacts on the quality and quantity of on-site riparian and wetland habitat
- Concern about dewatering wetlands along the Fraser River
- Concern about impacts to fens at Jasper
- Determine the magnitude, frequency, and flow duration required to enhance the riparian, wetland, and aquatic resources ecosystem and habitat of the Colorado River and its tributaries
- Discuss baseline conditions for aquatic vegetation potentially impacted by reservoirs
- Evaluate the impacts on the viability of water quality functions of wetlands affected by the Firming Project
- Determine location of mitigation wetlands
- Wetland delineation and descriptions should include wetland functional analysis if there are potential impacts
- Provide an analysis of direct, indirect, and cumulative impacts to all wetlands

APPENDIX D SUMMARY OF COMMENTS

Vegetation

- Concern about impacts to Bell's twinpod at Little Thompson
- Concern about impacts to CNHP "Imperiled Natural Communities"
- Concern about impacts to Ute ladies'-tresses orchid at Little Thompson
- Concern about impacts to the cottonwood/willow woodland and additional plants not common in other areas, but present at Little Thompson
- Evaluate impacts to vegetation from construction, presence, and operation of any reservoir
- Evaluate impacts to upland species that may be caused by changes in stream flow
- Minimize potential for noxious weed invasion during and after project construction

Aquatic Resources

- Document baseline conditions and problems related to whirling disease in the Windy Gap Reservoir and upstream on the Fraser River, the Three Lakes, and the East Slope
- Evaluate potential for mosquito-transmitted diseases such as West Nile virus
- Describe impacts to aquatic habitat
- Concern about fish kills due to stream flow changes in the Colorado River Basin
- Consider impacts to aquatic resources from water temperature changes in the Colorado River
- Concern about impacts to aquatic resources from stream flow changes
- Assess whether a by-pass channel would reduce the impact of whirling disease on downstream fisheries
- Concern about potential impacts to all Colorado River fish species
- Concern about increased numbers of invertebrates with potential increases in stagnant water near Little Thompson
- Discuss potential adverse effects to aquatic resources from reasonably foreseeable development on the West and East Slopes
- Evaluate impacts to aquatic invertebrates

Wildlife

- General concern about impacts to wildlife and fragmentation of wildlife habitat at each reservoir site
- Concern about loss of wildlife habitat at Little Thompson
- Concern about impacts to mountain lion, golden eagle, elk, and black bear at Little Thompson
- Evaluate impacts to fisheries caused by each alternative
- How will wildlife downstream of Little Thompson Reservoir be affected
- Concern about increased impacts to wildlife along roads near Little Thompson
- Concern about impacts to migratory species that depend on existing water flows in the Colorado River Basin
- Concern about impacts to wildlife corridors at each reservoir site
- Concern about impacts to avian hunting grounds near Little Thompson
- Concern about impacts to big horn sheep at Little Thompson
- Concern about impacts to wildlife from changes in stream flow in the Colorado River Basin

- Concern about loss of habitat connectivity at Chimney Hollow and Little Thompson Reservoir sites
- Provide a viable alternative route for wildlife migration at Little Thompson
- Concern about potential impacts to the umbilicate sprite (aquatic snail) near Jasper
- Concern about how domestic pets will be managed and potential impacts to migratory birds from feral dogs and cats
- Evaluate impacts to raptor nest sites at each reservoir site
- Evaluate impacts to wildlife habitat from construction, presence, and operation of any reservoir
- Extensive surveys may be warranted for CNHP tracked elements
- Involve the U.S. Fish and Wildlife Service as early as possible
- Verify resource data more than 5 years old
- What are the impacts to wildlife species near Jasper including: great blue heron, black bear, elk, mule deer, sage grouse, osprey, bald eagle, lynx, wood frog and sensitive carnivores such as the wolverine, American marten, and river otter
- Will efforts be made to relocate affected wildlife?

Threatened, Endangered and Candidate Species

- Concern about impacts to threatened, endangered, and candidate species at Little Thompson
- Concern about impacts to Preble's meadow jumping mouse
- General concern about impacts to threatened, endangered, and candidate species
- Evaluate impacts to rare and endangered species from construction, presence and operation of any reservoir
- Concern about impacts to boreal toad at Jasper and from changes in streamflow
- Concern about impacts to endangered fish species in affected streams
- Determine critical habitat for listed and sensitive species
- Evaluate impacts to endangered fish species in the 15-mile reach of the Colorado River near Grand Junction

Air and Noise Resources

- Concern about noise impacts during and after construction
- Concern about traffic noise near Little Thompson Reservoir site
- Concern about air pollution from motorized vehicles (on- and off-road) near reservoir sites
- Evaluate dust problems due to reservoir draw down
- Analyze effects to air quality from the population growth that the project might encourage (i.e., increased traffic congestion and vehicle miles traveled)
- Analyze effects of the project on NAAQS for ozone and global warming gas emissions and the impact of measures that may be required to achieve or maintain attainment under NAAQS
- Concern about air quality standards in Fort Collins and Greeley being exceeded due to future growth
- Evaluate increased pollutants from the Platte River Power Authority's increased production of electricity from coal powered generators

Visual Resources

• Concern about impacts to visual resources at reservoir sites

- Consider impacts to scenic resources caused by streamflow depletions
- Involve the public in identifying significant visual resources
- Concern about visual impacts associated with relocation of transmission line at Chimney Hollow

Socioeconomics

- Concern about impacts to private property at Little Thompson
- Concern about additional costs associated with upgrading wastewater treatment plants in the Fraser River and Colorado River basins to bring them into compliance if there are additional stream diversions
- Concern about vandalism, trespassing, and crime on private property near Little Thompson Reservoir site
- Offer fair market value for private property
- Document the number of homes and properties that would be impacted by the Little Thompson Reservoir, including condemnations
- Private property owners at Little Thompson Reservoir site are concerned about the inability to sell their property until a decision is made on this location
- How would the rafting businesses in Grand County be affected?
- Home-based businesses near Little Thompson would experience a loss of business revenue
- Evaluate baseline conditions and future impacts to Grand County's water-based recreation economy and tourism industry
- Evaluate economic impacts to activities (such as recreation) associated with changes in streamflow
- Concern about economic impacts to Grand Lake, Kremmling, and Hot Sulphur Springs
- Concern about how each alternative will affect real estate values and insurance costs
- Consider indirect impacts such as growth-related impacts on the Front Range and socio-economic effects on the West Slope
- Evaluate economic impacts attributed to changes in quality or quantity of recreation
- A cost/benefit ratio needs to be weighted against the loss of countryside and home condemnation
- Assess the likelihood that Participants can secure financing for the Firming Project
- Concern about increased power costs due to relocation of power transmission line near Chimney Hollow
- Concern about loss and/or increased cost of telecommunications, satellite, and internet service if Little Thompson Reservoir is constructed
- Concern about legal expenses incurred by homeowners if their property is condemned
- Concern about loss of time and capital spent looking for new home if forced to sell property at Little Thompson Reservoir site
- Concern that the Subdistrict has not accounted for all the direct and indirect costs associated with construction of the Little Thompson site
- Consider high costs of purchasing properties if the Little Thompson Reservoir site is selected
- Consider loss of tax revenues to Larimer County if Little Thompson Reservoir is constructed
- Determine the opportunity costs resulting from changes in existing stream and water usage
- Disclose effects to irrigation lands and rights downstream of the project and any associated economic effects

• Evaluate economic impacts of any lands taken out of agricultural production for suburban use · Evaluate effects to agricultural/irrigation users in the Colorado River Basin • Evaluate impacts to Grand County economy and ability to grow if water diversions from the basin increase Evaluate potential decreases in lease revenues from Wolford Mountain Reservoir • Evaluate the dollar loss due to the change in character of the Little Thompson community • Examine impacts to power supply or energy cost in Grand County How will private property values change if recreation use is developed at Little Thompson Reservoir • Little Thompson property owners are concerned about damage to private property during construction • Little Thompson property owners concerned about relocation costs for family, pets, and livestock if forced to move • Reservoirs may fuel additional population growth on the Front Range • The number of residences impacted by the proposed Little Thompson Reservoir are fewer than what other groups are claiming (about 14 would be impacted by a high water mark of 5600 feet) • Disclose baseline costs and future costs of water to existing and prospective water users in Grand County • What are the impacts of providing enough water to support a population increase of 300,000 people (based on 30,000 acre feet firm yield, and one acre-foot provides enough water for two families of five) Recreation · Evaluate recreation impacts at each reservoir site and adjacent lands · Concern about increased pollution, vandalism, and trespassing on private property resulting from recreation at Little Thompson River • Evaluate recreation impacts from changes in stream flow • Discuss plans to implement recreation at each reservoir and types of recreational use and facilities that will be allowed at each reservoir • Identify entities responsible for any future recreation management within 4-miles of Chimney Hollow and Little Thompson • Concern about impacts of the project on stream-based recreation (chiefly in the Upper Colorado River system) Support Larimer County's effort to protect open space in the vicinity of Chimney Hollow, but not as a condition of endorsement or approval of the Firming Project Desire access to reservoirs directly from private property adjacent to Chimney Hollow • Do not allow motor boats at Chimney Hollow Limit boat size and ban personal watercraft at Chimney Hollow Do not allow rock climbing at Chimney Hollow • Evaluate recreation impacts on Grand Lake and the Colorado River · Examine impacts to recreation below Green Mountain Reservoir and the Colorado mainstem to Glenwood Springs

• Exclude recreation from the proposed sites because the public has not been able to anticipate, study, and comment on these impacts
• Evaluate impacts from changes in surface elevations in Grand Lake
Land Use
Concern about impacts to public and private protected lands (e.g., private land protected under conservation easement)
Concern about inundation of land conveyed to land trusts at Little Thompson
• Determine whether there are impacts to future development opportunities in Grand County due to water diversions
Concern about homes and businesses being inundated by the Little Thompson reservoir
• Consider impacts to the Grand Lake shoreline and property rights from an alluvial buildup on the Grand Lake side of the outlet canal
Concern about location proposed for moving existing power lines at Chimney Hollow
Concern about impacts to the community in the Indian Gap area, near Little Thompson
Condemnation of property should be a last resort
Consider impacts associated with land use east of the Continental Divide, including conservation programs
Consider land use regulations in the Boulder Land Use Code
Consider the impacts to agricultural lands at Little Thompson Reservoir site
• Evaluate direct and indirect effects to existing land use from new water and/or power transmission and conveyance facilities
• Evaluate impacts from recreation amenities developed at reservoir sites and the associated future commercial, retail, and residential development
• Examine impacts to Shoshone Power Plant from changes in Colorado River stream flow
Examine potential impacts to existing land uses for each reservoir
• Include a management plan for surrounding land uses (e.g., pesticide, nutrient, weed, and recreation management)
 Landowner development plans for portions of the Jasper Reservoir site should be taken into consideration
Work with Larimer County to protect the Little Thompson corridor
• Analyze impacts of development beyond established growth estimates (the Firming Project may enable or induce development in excess of that already accounted for)
Transportation
Concern about increased traffic near Little Thompson
Concern about increased traffic on Blue Mountain Road and CR71N Little Thompson
Evaluate impact of permanent increases in traffic near Little Thompson
How will access to private property be affected by construction of Little Thompson or Chimney Hollow?
Concern about new road construction near reservoirs
Concern about who will pay for road improvements near Little Thompson and Chimney Hollow
Concern about emergency vehicle access if Little Thompson is open to recreational traffic

- Concern about increased levels of traffic accessing Chimney Hollow via Highway 56 and through County Road 8
- Determine baseline conditions and future impacts of traffic patterns on Highway 34 due to construction or operation of Little Thompson Reservoir
- Include a plan for an additional road to be built outside Spring Gulch Ranch Estates to provide access near Little Thompson Reservoir

Cultural Resource

- Concern about impacts to cultural resources at Little Thompson and the need for intensive studies
- General concern about impacts to cultural resources
- Consult with Native Americans regarding cultural resources at Little Thompson Reservoir
- Preserve artifacts from Little Thompson in a museum or return them to appropriate tribes

Hazardous Waste

- Concern about impact of Little Thompson on the Syntax Toxic Waste Dump site near Rabbit Mountain
- Concern about old uranium mine tailings above Church's place leaching into Little Thompson
- Concern about contamination of Little Thompson Reservoir and downstream water quality from uranium, sulfur, and high concentrations of salts
- Consider the potential for hazardous materials to infiltrate the Colorado River due to a spill incident on U.S. 40 or the railroad tracks

Environmental Justice

• Give complete and impartial consideration to impacts to Fraser residents

Institutional Considerations

- Fully disclose the impacts of prepositioning, its feasibility, and Reclamation's authority storage of C-BT water in a Firming Project reservoir
- Discuss the relationship between the Firming Project and the requirements of SD 80 and the Blue River Decrees including any limitations or restrictions
- Determine whether prepositioning requires an amendment to the Carriage Contract for Windy Gap
- Discuss whether a new exchange right is required and how diversions, storage, and refills involving multiple facilities will be accounted for
- Address the complexities that have arisen from over 130 years of Colorado water law and transbasin diversions
- Analyze all institutional limitations
- Build upon existing relationships with Denver and Grand County by coordinating throughout the development of the EIS
- Can the firming project be conducted under the existing Amendatory Contract dated March 1, 1990?
- Determine whether the Carriage Contract can be modified to carry third party water
- Discuss institutional and environmental issues associated with prepositioning Windy Gap water in Chimney Hollow
- Discuss the relationship between the existing Windy Gap project and the C-BT project

- Has the Subdistrict has complied with C.R.S. 37-45-118(2)(II) pertaining to trans-basin diversions and their impacts to the Colorado basin and its water users?
- Include the Middle Park Water Conservancy District as a Participant
- Change laws, policies, and codes that could assist communities to make better use of existing water supplies
- Establish a Citizen's Advisory Committee to help solve water issues in the state
- Would the Firming Project violate the primary purpose of the C-BT project?
- Would the Firming Project alter existing environmental commitments, IGAs, and water rights?

Regulatory Issues

- Describe all the existing permits and approvals that pertain to Windy Gap and whether there is need for modification of these permits for the Firming Project
- The Firming Project EIS and Denver Water Project EIS should be consolidated
- Concern about Reclamation as the lead agency and its ability to accomplish duties as a "Trustee"
- Include Grand County as a Cooperating Agency
- Concern about lack of coordination between the Subdistrict, Denver Water, the Corps, and Reclamation surrounding the Denver Water Moffat Collection System and Firming Project
- Consider 1041 Regulations for Boulder County when evaluating the Little Thompson alternative
- Include a representative of Grand County on the Municipal Subdistrict of NCWCD Board of Directors
- Identify all permits and approvals that will be required
- The EIS should address any changes to the principal conclusions of the original Windy Gap EIS regarding the total diversion amount, Lake Granby water levels, availability of East Slope storage to meet future firming needs, and the lack of impacts to wildlife, aquatic biota, recreation, aesthetics, land use and socioeconomics

Cumulative Impacts

- Consider cumulative impacts associated with the Denver Water Moffat Collection System
- Evaluate cumulative impacts in the Upper Colorado River Basin, particularly above Kremmling
- Cumulative impacts associated with the C-BT operations should be considered
- Coordinate with Denver Water to share information and analyses
- Assess the relationship of the Firming Project and the Denver Water Project on the transportation and land use planning processes occurring on the Front Range
- Concern about evaporative effects of a reservoir on regional climate and precipitation patterns in the context of cumulative climatic effects of planned water storage in the region and the state
- Consider impact of the Firming Project on identified upper Fraser River Basin needs as part of the individual and cumulative impact sections
- Consider streamflows, water quality, and aquatic communities impacted by the Denver Water Project
- Evaluate cumulative impacts to aquatic resources and streamflows of the South Platte River system
- Evaluate secondary regional environmental impacts on wildlife habitat, water quality, air quality and aesthetic values from regional population growth and development generated by the Firming Project

• Evaluate the impact of the Firming Project in relation to potential cumulative effects upon global warming and climate change of similar projects approved or planned throughout the region • Look at the effects of reasonably foreseeable growth on the West Slope and East Slope and its effects on the hydrology and aquatic resources Mitigation Consider joint mitigation between the Denver Water Project and the Firming Project Consider mitigation in the form of water storage directly benefiting water users in the Fraser River headwaters • Discuss whether mitigation measures are provided if prepositioning results in impacts to the C-BT project • Estimate costs for any mitigation measures • Identify appropriate mitigation for each alternative • Include mitigation measures for lake eutrophication at any of the Three Lakes Include mitigation measures to compensate for the impacts associated with an increased population • List mitigation measures for potential adverse impacts to stream systems • Mitigate Grand County impacts by wheeling water through the Fraser River Valley through NCWCD system to Denver's system using existing infrastructure • Mitigate impacts of Little Thompson by procuring and protecting a similar riparian corridor in the region with similar biological and geological characteristics Mitigation for the whirling disease problem should be a requirement for the Firming Project • Refer to the GEI Upper Colorado River Report to assist with developing mitigation for West Slope impacts Subordinate Subdistrict's Windy Gap Project water rights to upstream storage benefiting local water users as a form of mitigation • The Firming Project should only be permitted in conjunction with substantial mitigation **General Issues** • General concern about overall environmental impacts Concern about increased fire danger around Little Thompson Reservoir site Concern about a reservoir at Little Thompson being a terrorist target • Conduct resource studies over each of the four seasons at Little Thompson Consider GEI's Fraser River Study in the EIS • Evaluate impacts of the Poudre Project on the Firming Project • Hold additional public meetings in Grand Lake during Summer 2004 · Visit areas to be inundated