

WGEP 103
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 DISTRICT 51

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Will Tully
 US Bureau of Reclamation, Eastern Colorado Area Office
 11056 W. County Rd. 18E
 Loveland, CO, 80537-9711

Mr. Will Tully,

I was at the public hearing in Granby a couple of weeks ago, and while I did not speak, I would like to reiterate the arguments made by many regarding the inadequacy of the Windy Gap Firming Project Draft EIS.

As a Water Commissioner in the headwaters of the Colorado, District 51 of Division 5, I understand the necessity of water resources management and the necessity of planning for the future. I work directly with the Northern Water Conservancy District, and understand the west slope operation very well.

I have only been in this professional position and lived in Grand County for 3 relatively good water years, but have witnessed directly the impacts on the ecology of the river system including the fisheries and morphological impacts, the remarkable impact upon stream temperatures, and the detrimental impact to local irrigation downstream from the Windy Gap project that occur when the Windy Gap pumps are turned on to divert water to Granby Reservoir.

I understand the power of and the necessity for Colorado State Water Law and directly understand the importance of firming the conditional water rights that are represented by this Windy Gap Firming project. I believe that rather than a question of the right to divert this water, this is a question of values, pertaining to the impact that this project will have upon the environmental conditions of both the Colorado River above the confluence with the Blue River and the Three Lakes region. I also feel that this project places greater value on the communities of the Municipal Subdistricts than on the local Grand Community of which I have direct contact on a daily basis, particularly the ranchers and business owners who rely upon adequate water for their own livelihoods.

I have read the Draft EIS, considering the impacts as a professional Water Commissioner and as a trained Environmental Scientist and feel that it is inadequate, from the opening Statements of Purpose and Need all the way through the considerations of mitigation. I feel that this Draft EIS does freely admit that there will be abundant environmental impacts while offering no real considerations of actions to adequately address or to mitigate these impacts.

Please see the following statements that appropriately express my opinions:

With 60% of the Upper Colorado River already being diverted, this project is applying to take another 20%. This is 1/2 of the existing Upper Colorado River bellow the Windy Gap Reservoir.

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The water these Front Range municipalities are intending to take represents 10% of their total water needs. By conserving 10% of their total water use, they will not need to take ½ of the water remaining in the Upper Colorado River. Some municipalities in the arid West have conserved from 20% to 30%. None of the municipalities applying for this water can make this claim.

The Windy Gap Project draft Environmental Impact Statement admits that these additional diversions will cause negative environmental impacts but does not commit to mitigating these impacts.

The Windy Gap draft EIS must use Grand County's Stream Flow Management Plan as the guideline to mitigating the negative impacts experienced from this project.

Existing diverted water has had a very large negative impact on lake clarity in Grand Lake. Additional water being pumped through Grand Lake will further exacerbate this problem.

The negative impacts to the Fraser River caused by the Denver Water Moffat Firming Project must be included in the Windy Gap draft EIS. The combined impact of both of these is the true impact to the Colorado River bellow Windy Gap. The Colorado River is the lifeblood of our environment and the environment is the drive engine for our tourism industry in Grand County and the State of Colorado.

All of the comment points are not yet understood. This is a very large and very complicated document and the public comment period needs to be extended by another 60 days so that all of the comment points can be made.

Thank you for your consideration.

Sincerely,
Neal Misbach