From: Michael Woodford
To: wtully@gp.usbr.gov;
Subject: Windy Gap Firming Project DEIS Comment
Date: Friday, December 26, 2008 10:53:40 AM

Dec 26, 2008

Mr. Will Tully
11056 W. CR 18E
Loveland, CO 80537

Dear Mr. Tully,

Thank you for the opportunity to comment on the Windy Gap Firming Project.
The Colorado River supports numerous environmental, recreational and

economic values that are under strain from current depletions and could

be further harmed by the WGFP. The Draft Environmental Impact Statement

falls short of providing an accurate picture of the impacts of the WGFP in the context of other demands on the river. A Supplemental Draft Environmental Impact Statement is warranted and should address and resolve - the following issues:
1. Given the overwhelming scientific evidence supporting climate

change, and the lack of analysis in the DEIS, the Supplemental EIS must analyze the impacts of climate change together with the impacts of the Windy Gap Firming Project.
2. The Supplemental EIS should more rigorously assess the impacts to recreational boating and angling as the Draft EIS uses a hydrological model that underestimates potential flow impacts and the resulting impacts on recreational activities.

3. There will be a permanent loss of 810 acres of big game habitat from the creation of Chimney Hollow Reservoir. Thus, the Supplemental EIS

should provide more rigorous analysis about how migration patterns will be mitigated and how habitat loss will be offset.

4. Reclamation should analyze the cumulative impacts of all trans-basin diversions from the Colorado River, including a careful assessment of existing impacts from the Colorado-Big Thompson Project and Moffat Collection System, and not just the direct impacts of WGFP.

5. The Supplemental DEIS should include a more rigorous assessment of fishery flow needs with the goal of developing options that could attain or come close to attaining the targets presented in the Grand County Streamflow Management Plan study.
6. The implications of WGFP on the Colorado River's potential

suitability for Wild and Scenic River designation should be documented, and measures to avoid those impacts should be included as requirements for any federal approvals.

7. The Supplemental EIS should use the State of Colorado's temperature standards in assessing temperature impacts, and determine which

operational changes are necessary for WGFP to avoid violations of state water quality temperature standards. Those changes should be included as requirements of any federal approvals.
8. The Supplemental EIS should look at non-structural alternatives, such as water conservation programs and dry-year leasing of irrigation water, which would not deplete the Colorado.

Sincerely,

Mr. Michael Woodford
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Denver, CO 80210-6510