



BAR LAZY J

GUEST RANCH



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

Mr. Chandler J. Peter
U.S. Army Corps of Engineers
Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80128-6901

Re: Windy Gap Firing Project Draft EIS

Mr. Tully & Mr. Peter:

As business owners and managers, we write to share our serious concerns with the proposed Windy Gap Firing Project (WGFP) and its potential impacts on the Colorado River and, by extension, on the regional economy.

The Colorado River and its tributaries are the lifeblood of western slope communities, supporting economic drivers from recreation and tourism to agriculture. For example, in Grand County, every tourist activity relies directly on the natural flow of water – and visitor expenditures account for a majority of retail sales countywide. Maintaining a healthy Colorado River is not only essential to local ecosystems, but to the economic future of our region. Protection of the Colorado River should be a basic expectation for WGFP before any federal approvals are granted.

Indeed, the Bureau of Reclamation has a legal responsibility to operate the Colorado-Big Thompson Project in a manner that furthers the primary purposes of the project. Those primary purposes include preservation of the Colorado River's fisheries and recreation opportunities. Accordingly, unless strict conditions are imposed on WGFP that will ensure that no harm will result, Reclamation must not approve the project.

Unfortunately, the Draft Environmental Impact Statement fails to reasonably assess the impacts of the WGFP on the Colorado River's natural resources and the local economies that rely on them. In many places, the DEIS makes leaps that strain believability. For example, the DEIS anticipates that WGFP is "unlikely to noticeably affect recreation use" at Granby – despite information showing that the project would result in additional periods when boat ramps at Granby Reservoir would be inaccessible due to lower reservoir levels. The DEIS downplays consideration of cumulative effects of WGFP alongside historic operations so as to suggest that there will be little effect on fisheries or fishing – despite information showing that periods of lower flow will become more common and that state water quality standards for temperature will be violated. As local businesses, it seems to us that the DEIS is asking our communities to take a leap of faith that WGFP is benign despite – not because of – the evidence.

Perhaps the most serious flaw is the DEIS' failure to consider the broad-based economic effects of reduced recreation and the ripple effects through the regional economy. The DEIS excludes from consideration many key aspects of the recreation economy by limiting




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consideration to active recreation where there is public access. This narrow analysis fails to include many key economic factors for the west slope:

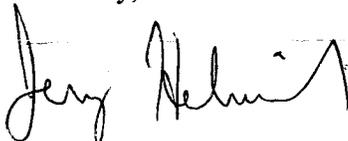
- potential failure of irrigation systems due to reduced streamflow;
- ranchers who rely on fishing leases along the Colorado River;
- real estate and resort developments where a healthy Colorado River is a primary or sole asset;
- lakefront and riverfront properties whose value is directly related to reservoir water clarity and water quality; and
- numerous summer recreation-oriented and visitor-oriented businesses including private marinas, local motels, restaurants, recreation-oriented retailers, et cetera.

In light of these major deficiencies, we ask that Reclamation and the Corps develop a Supplemental Environmental Impact Statement that offers a more thorough and accurate consideration of the environmental and economic effects of WGFP – to inform your decision-making and to allow the public the opportunity to review and comment on the analyses that were inadequate in the current DEIS. In this Supplemental EIS, we request that you:

- Analyze the cumulative impacts of all trans-basin diversion from the Colorado River, including existing impacts from the Colorado-Big Thompson Project and Moffat Collection System.
- More rigorously assess fishery flow needs so that a determination can be made of whether WGFP is consistent with the Colorado-Big Thompson Project primary purpose of preserving the Colorado River's fisheries.
- Conduct a more complete assessment of the socioeconomic impacts of the WGFP, including the impacts described above that were omitted from consideration in the DEIS.
- Consider alternatives for water supply to the WGFP participants that would not require further significant depletions of the Colorado River.

As businesspeople, our livelihoods depend on preservation of a viable Colorado River. We urge you to take the steps necessary to protect this vital resource for our environment, communities, and economy. Thank you for the opportunity to comment.

Sincerely,



Jerry Helmicki
President
Bar Lazy J Guest Ranch

Tully

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