From: Alex Gibson [rhvrealty@aol.com]
Sent: Monday, January 05, 2009 8:23 PM
To: wtully@gp.usbr.gov
Subject: Windy Gap Firming Project DEIS

December 26, 2008
Bureau of Reclamation Will Tully
11056 W. CR 18E
Loveland, CO 80537

Dear Will Tully,

I want to express my support for the following proposals submitted by Trout Unlimited, the Colorado Environmental Coalition, Western Resource Advocates and other conservation organizations, in response to the Bureau of Reclamation's Draft Environmental Impact Statement for the Windy Gap Firming Project (WGFP).

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:

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.

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.

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.

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.

The Supplemental EIS should look at non-structural alternatives to WGFP, such as water conservation programs and dry-year leasing of irrigation water, which would not deplete the Colorado.

Thank you for the opportunity to comment.

Sincerely

Alex Gibson
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