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Response to Comments by Individuals

Responses to individual comments are organized by comment topic to provide a more comprehensive response while limiting repetition (Table 3). Individuals who commented on the Draft EIS are listed alphabetically by last name below in the section on *Comments by Individuals*. Below each individual's name is a list of the topics that were mentioned in their comments. Responses to individual comments can be found by first looking at the comment topic code for an individual comment and then in the responses to comments for a given topic in the section below on *Response to Individual Comments by Topic*. The previous responses to comments from cooperating agencies, government agencies, elected officials, organizations, environmental groups, and businesses provide additional details and information on many of the issues identified by individual commenters.

Table 3. Comment codes.

Comment Code	Topic	Page
1000	Purpose and Need	F-615
2000	Alternatives and Reasonably Foreseeable Actions	F-617
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3100	Surface water hydrology	F-620
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3160	Stream morphology and floodplains	F-625
3200	Surface water quality	F-625
3300	Aquatic resources	F-630
3400	Vegetation	F-632
3500	Wildlife	F-633
3550	Threatened and endangered species	F-633
3600	Land use and land ownership	F-633
3700	Recreation	F-635
3770	Visual resources	F-637
3800	Socioeconomics	F-637
3900	Comments on other resources	F-638
4000	Mitigation	F-639
5000	Comments on EIS process	F-642
6000	Legal and regulatory issues and other comments	F-643

Comments by Individuals

Doc **Commenter and Issues**

Adams, Craig

1 3001 Concern about overall environmental impacts

Adornetto, Cynthia (Broomfield, CO)

848 1008 Improved conservation plans should be developed
6002 Opposes project
2701 Consider Denver Moffat Collection System Project in impacts
4021 Additional mitigation is needed

Aex, Tom (Steamboat Springs, CO)

2 6002 Opposes project

Alander, Erik and Patty

1051 1007 Comment on water conservation River hydrology
3104 Concern about impact on Colorado

Alweis, Richard (Denver, CO)

3 5001 Request for extension of comment period
6002 Opposes project

Anderson, Fred E. (Loveland, CO)

257 2202 Comment supports Proposed Action

Arguino, Will

354 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3809 Concern about West Slope economic effects
4003 Comment or suggested mitigation for surface water flow
6002 Opposes project
6030 Other comments

Arnold, Andy

355 6002 Opposes project

Atyas, Joel (Asheville, NC)

6 3703 Concern about impact to boating in economic effects to the Colorado River
3704 Concern about impact to fishing in the Colorado River
3804 Concern about Colorado River boating
3805 Concern about economic effects to Colorado River fishing

Bacon, Teresa and Peter Sutherland (Englewood, CO)

170 1008 Improved conservation plans should be developed

Bailey, Char (Lyons, CO)

8 1007 Comment on water conservation System Project in impacts
2701 Consider Denver Moffat Collection Management Plan
3901 Consider Grand County Stream
4003 Comment or suggested mitigation for surface water flow

Banks, Charles

356 1006 Believes conservation would eliminate need for project
1008 Improved conservation plans should be developed
3815 Concern about impact to West Slope tourism
4006 Comment or suggested mitigation for water quality

405 1008 Improved conservation plans should be developed
3809 Concern about West Slope economic effects
3815 Concern about impact to West Slope tourism
5001 Request for extension of comment period

Bauer, Ronald

7 3001 Concern about overall

environmental impacts

Beardsley, Richard

856 4021 Additional mitigation is needed 6001 Supports project

1053 4021 Additional mitigation is needed

Bender, Sue (Loveland, CO)

65 1007 Comment on water conservation 3308 Concern about aquatic life in Grand Lake 3708 Concern about impact to recreation at Grand Lake

6002 Opposes project

Bergen, Gretchen (Granby, CO)

10 1008 Improved conservation plans should be developed 3901 Consider Grand County Stream Management Plan

Berman, Patricia

11 1008 Improved conservation plans should be developed 3901 Consider Grand County Stream Management Plan 6002 Opposes project

Binder, Robert D. (Lakewood, CO)

12 6002 Opposes project

Bisbee MD, John W. (Fort Collins, CO)

861 3210 Concern about Grand Lake water quality 3304 Concern about aquatic life in Colorado River 3422 Concern about impacts to West Slope wetlands and riparian habitat

3703 Concern about impact to boating in the Colorado River 3815 Concern about impact to West Slope tourism 4021 Additional mitigation is needed

6002 Opposes project

Bowman, Rudy

1139 1008 Improved conservation plans should be developed 3506 Concern about impacts to wildlife at Chimney Hollow Reservoir 3609 General comment on land use

6002 Opposes project

Bowser, Bob

14 6002 Opposes project

Boyd, Mark: Control Solutions Inc. (Winter Park, CO)

15 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3210 Concern about Grand Lake water quality

3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed 5001 Request for extension of comment period

Brickner, Cassidi

16 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3801 Comment on West Slope socioeconomics affected environment

3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed

Brockway, Jerome D.

212 6002 Opposes project

Brooks, Joan C.

17 1007 Comment on water conservation

Brooks, Scott (Mtg.)

18 1008 Improved conservation plans should be developed

Brown, Douglas

20 3801 Comment on West Slope socioeconomics affected 6002 Opposes project

environment

Browne, Jeff (Fraser, CO)

21 1007 Comment on water conservation
3206 Concern about Colorado River water quality
3317 Concern about Zebra or Quagga mussels
3808 Concern about economic effects at Grand Lake
3809 Concern about West Slope economic effects
3810 Concern about East Slope economic effects
360 3104 Concern about impact on Colorado River hydrology
3206 Concern about Colorado River water quality
3229 Concern about Three Lakes water quality
3317 Concern about Zebra or Quagga mussels
3809 Concern about West Slope economic effects
6030 Other comments

Brunswig, Lori (Fort Collins, CO)

171 2005 Other substantive comment about Alternatives

Cada, Frank (Mtg.) (Loveland, CO)

22 3304 Concern about aquatic life in Colorado River
3726 Concern about impact to recreation at Chimney Hollow
3805 Concern about economic effects to Colorado River fishing
3814 Concern about cost to participants
6002 Opposes project

Cadarette, Judith (Loveland, CO)

23 1007 Comment on water conservation

Canup, Dan and Judy

172 3002 General concern about environmental impacts on the West Slope
6002 Opposes project

Carpenter, Norman A.: Gold Medal Ranch LLC

24 6002 Opposes project

Carpenter, Steve (Evergreen, CO)

173 3002 General concern about environmental impacts on the West Slope
3719 Concern about West Slope recreation impacts

Cassidy, Lynn (Hot Sulphur Springs, CO)

877 1008 Improved conservation plans should be developed
3213 Other comment on West Slope water quality
3229 Concern about Three Lakes water quality
3304 Concern about aquatic life in Colorado River
3317 Concern about Zebra or Quagga mussels
3605 Concern about impact to agriculture
3806 Concern about economic effects at Granby Reservoir

Chilson, John (Loveland, CO)

409 3506 Concern about impacts to wildlife at Chimney Hollow Reservoir
3603 Concern about impact to land use and ownership on East Slope

Clark, John (Eagle, CO)

25 5001 Request for extension of comment period
6002 Opposes project

Clark, Tom (Kremmling, CO)

26 2701 Consider Denver Moffat Collection System Project in impacts
3206 Concern about Colorado River water quality
3608 Concern about ability to divert water from the Colorado River

Cloud, Jacob (Denver, CO)

28 1007 Comment on water conservation
3001 Concern about overall environmental impacts
3605 Concern about impact to agriculture
3815 Concern about impact to West Slope tourism

Colosimo, Norma

30 1007 Comment on water conservation

Copanas, Brian (Littleton, CO)

31 3703 Concern about impact to boating in economic effects to the Colorado River

3704 Concern about impact to fishing in the Colorado River

3804 Concern about Colorado River boating

3805 Concern about economic effects to Colorado River fishing

32 3703 Concern about impact to boating in economic effects to the Colorado River

3704 Concern about impact to fishing in the Colorado River

3804 Concern about Colorado River boating

3805 Concern about economic effects to Colorado River fishing

4016 Comment or suggested mitigation for recreation

6002 Opposes project

Crane, Jace

34 6002 Opposes project

35 1007 Comment on water conservation economic effects to

3703 Concern about impact to boating in the Colorado River

3804 Concern about Colorado River boating

3805 Concern about economic effects to Colorado River fishing

Crespin, Arthur (Denver, CO)

1065 1008 Improved conservation plans should be developed

2701 Consider Denver Moffat Collection System Project in impacts

3304 Concern about aquatic life in Colorado River

4021 Additional mitigation is needed

Crespo, David

36 3304 Concern about aquatic life in to fishing in Colorado River

3703 Concern about impact to boating in the Colorado River

3704 Concern about impact the Colorado River

Cripps, Kevin

37 3304 Concern about aquatic life in to boating in Colorado River

3402 Concern about impacts to West Slope vegetation

3703 Concern about impact the Colorado River

Crocker, Melissa (Littleton, CO)

38 1008 Improved conservation plans of comment should be developed

4001 Comment on proposed mitigation

5001 Request for extension period

Crouse, Matt

39 1007 Comment on water conservation Colorado River

3304 Concern about aquatic life in

Cunningham, Mac (Mtg.)

213 2710 Evaluate cumulative effect of all to land use transbasin diversions, including C-Slope BT and Moffat

3230 Use state temperature standards in evaluating impacts

3603 Concern about impact and ownership on East

3711 Evaluate impact on Colorado River's potential suitability for Wild and Scenic River designation suitability as a

3902 Assess fishing flow needs and options to meet targets in Grand County Stream Mgt. Plan

4023 Include measures to avoid impacts to Colorado River Wild and Scenic River

4024 Implement operation changes to avoid violation of temperature standards in the Colorado River

5005 A supplemental EIS should be prepared

Curfman, Jim

889 1008 Improved conservation plans should be developed

3704 Concern about impact to fishing in the Colorado River

Current, Craig and Mari

174 1008 Improved conservation plans should be developed
6002 Opposes project
2701 Consider Denver Moffat Collection System Project in impacts
6005 Concern about complying with Senate Document 80
3210 Concern about Grand Lake water quality
6030 Other comments

Dalton, Robert K. and Lynda (Denver, CO)

40 2601 Construct a pipeline to avoid water deliveries to Grand Lake
4021 Additional mitigation is needed
6005 Concern about complying with Senate Document 80

214 3203 Comment on Three Lake water quality model
6005 Concern about complying with Senate Document 80
3210 Concern about Grand Lake water quality
6002 Opposes project

Davis, Timothy A.: Deloitte Consulting LLP (Denver, CO)

41 3153 Concern about West Slope ground water hydrology
3304 Concern about aquatic life in Colorado River
3605 Concern about impact to agriculture

Deane, Richard L. (Denver, CO)

42 6030 Other comments

Delaney, Kevin (Tabernash, CO)

175 1008 Improved conservation plans should be developed
3002 General concern about environmental impacts on the West Slope
6002 Opposes project

Dewey, Marv (Granby, CO)

43 6002 Opposes project

Dils, Karen (Buena Vista, CO)

215 1008 Improved conservation plans should be developed
conservation and dry year leasing of irrigation water
3230 Use state temperature standards in evaluating impacts
3902 Assess fishing flow needs and options to meet targets in Grand County Stream Mgt. Plan
5005 A supplemental EIS should be prepared
2603 Consider non-structural alternatives such as water
3310 Other comment about West Slope aquatic life
4023 Include measures to avoid impacts to Colorado River suitability as a Wild and Scenic River
2710 Evaluate cumulative effect of all transbasin diversions, including C-BT and Moffat
3711 Evaluate impact on Colorado River's potential suitability for Wild and Scenic River designation
4024 Implement operation changes to avoid violation of temperature standards in the Colorado River

Dines, Darren and Leslie

45 6002 Opposes project

Dines, Dorothy

44 1008 Improved conservation plans should be developed

Docheff, Jodi

176 6002 Opposes project

Drewett, James

365 1008 Improved conservation plans should be developed
3002 General concern about environmental impacts on the West Slope

East, Marvin R.

47 3104 Concern about impact on Colorado River hydrology

Eberhard, Michael (Fraser, CO)

177 1008 Improved conservation plans should be developed 2600 Suggested new alternative 3020 Other substantive comment on and effects

3133 Concern about water rights

Edelson, Rick

48 1006 Believes conservation would eliminate need for project 3001 Concern about overall environmental impacts

Ehlen, John (Fraser, CO)

49 2707 Effect of climate change should be evaluated 3103 Comment on hydrologic model 3104 Concern about impact on Colorado River hydrology

366 2707 Effect of climate change should be evaluated 3103 Comment on hydrologic model

Eichler, Dirk: Water's Edge Reclamation (Fraser, CO)

50 3901 Consider Grand County Stream Management Plan 5001 Request for extension of comment period

Eller, Ron (Fraser, CO)

178 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3002 General concern about environmental impacts on the West Slope

3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed

Ellis, Sally A. (Boulder, CO)

216 1008 Improved conservation plans should be developed 3719 Concern about West Slope recreation impacts 6002 Opposes project

Emslie, Bill: Platte River Power Authority (Fort Collins, CO)

367 2202 Comment supports Proposed Action

Erwin, John (Fraser, CO)

52 1008 Improved conservation plans should be developed 5001 Request for extension of comment period

368 1008 Improved conservation plans should be developed 2103 Comment supports No Action alternative 2602 Consider conservation as an alternative

Faaborg, Roger (Loveland, CO)

53 3001 Concern about overall environmental impacts 6002 Opposes project

Fehr, Todd (Greenwood Village, CO)

1068 2701 Consider Denver Moffat Collection System Project in impacts 3304 Concern about aquatic life in Colorado River 4021 Additional mitigation is needed

Fender, Sharon and Dan

179 1008 Improved conservation plans should be developed 4021 Additional mitigation is needed

Fenton, Connie

54 1006 Believes conservation would eliminate need for project 2701 Consider Denver Moffat Collection System Project in impacts 3210 Concern about Grand Lake water quality

3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed 5001 Request for extension of comment period

Foley, Ian (Denver, CO)

56 2105 Comment on No Action alternative 3720 Concern about impact to boating in 3721 Concern about impact to boating in

		facilities/operation		the Big Thompson River		North St. Vrain or St. Vrain Creek	
	4016	Comment or suggested mitigation for recreation	4021	Additional mitigation is needed			
	Ford, Alan						
180	1008	Improved conservation plans should be developed					
	Fosmire, Brenda						
181	1008	Improved conservation plans should be developed	6002	Opposes project			
	Frame, Ann and Jerry (Grand Lake, CO)						
909	6002	Opposes project					
	French, Rhonda (Loveland, CO)						
410	3133	Concern about water rights					
	Gardner, Dave (Colorado Springs, CO)						
474	6002	Opposes project					
	Gibson, Jeff (Rancho Del Rio, CO)						
916	6002	Opposes project					
	Gillis, Kenneth (Denver, CO)						
1071	1008	Improved conservation plans should be developed	3002	General concern about environmental impacts on the West Slope	3153	Concern about West Slope ground water hydrology	
	3204	Comment on QUAL2K model	3304	Concern about aquatic life in Slope wetlands and riparian habitat	3422	Concern about impacts to West Colorado River	
	Gilmore, Donna (Denver, CO)						
60	1008	Improved conservation plans should be developed	4021	Additional mitigation is needed	5001	Request for extension of comment period	
	Goldenberg, Stewart: Farmers Insurance (Lakewood, CO)						
61	1006	Believes conservation would eliminate need for project					
	Goodwin, Patty						
921	3002	General concern about environmental impacts on the West Slope	3206	Concern about Colorado River water quality	3304	Concern about aquatic life in Colorado River	
	3402	Concern about impacts to West Slope vegetation	3719	Concern about West Slope recreation impacts	3815	Concern about impact to West Slope tourism	
	Green, Mary Jane						
62	1008	Improved conservation plans should be developed	4020	Other suggested mitigation			
	Griggs, Grace (Keenesburg, CO)						
63	1008	Improved conservation plans should be developed	4021	Additional mitigation is needed	5001	Request for extension of comment period	
	Grimes, Harold						
182	3104	Concern about impact on Colorado River hydrology					
	Haire, Marcy (Loveland, CO)						
65	1007	Comment on water conservation to Grand Lake	3308	Concern about aquatic life in recreation at Grand Lake	3708	Concern about impact to	
	6002	Opposes project					
	Hall, Chris: Cutthroat Anglers (Silverthorne, CO)						
1110	6005	Concern about complying with Senate Document 80					

Hanzel, Karl (Boulder, CO)

929 1008 Improved conservation plans should be developed

Harder, Cindy: Vaquera Enterprises (Granby, CO)

183 1008 Improved conservation plans should be developed
3809 Concern about West Slope economic effects

Harrelson, Gary

370 3809 Concern about West Slope economic effects

Hathaway, Wm. E. and Helen S.

66 1008 Improved conservation plans should be developed

Hedlund, Roger (Tabernath, CO)

64 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3901 Consider Grand County Stream Management Plan

Hess, James C.

184 1006 Believes conservation would eliminate need for project
3506 Concern about impacts to wildlife at Chimney Hollow Reservoir

Hilgenberg, Mel: Legacy Leadership Center (Fort Collins, CO)

413 2000 Alternatives
6030 Other comments

Hites, Sylvia

371 1008 Improved conservation plans should be developed
2600 Suggested new alternative
3229 Concern about Three Lakes water quality

Hobbs, Michael (Northglenn, CO)

224 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3304 Concern about aquatic life in Colorado River
4021 Additional mitigation is needed
5001 Request for extension of comment period

Hollrah, Paul (Winter Park, CO)

68 2707 Effect of climate change should be evaluated complying with
3103 Comment on hydrologic model
6005 Concern about Senate Document 80

372 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3209 Concern about Shadow Mountain water quality
3210 Concern about Grand Lake water quality
3231 Concern about increase in Colorado River temperature
3304 Concern about aquatic life in Colorado River
3805 Concern about economic effects to Colorado River fishing
3901 Consider Grand County Stream Management Plan
4006 Comment or suggested mitigation for water quality
5001 Request for extension of comment period

Holmberg, Steve

185 3809 Concern about West Slope economic effects
6002 Opposes project

Howe, Charles W.

70 3820 Comment on other economic effects
6002 Opposes project

Hubbard, Graydon D.

71 4020 Other suggested mitigation
6002 Opposes project

Hughes, Kent (Fraser, CO)

72 6002 Opposes project

Hut, Martha (Tabernash, CO)

939 3901 Consider Grand County Stream Management Plan
4021 Additional mitigation is needed

Ingram, Kent

1081 1008 Improved conservation plans should be developed
3133 Concern about water rights
3206 Concern about Colorado River flows will result in more Didymo algae
3317 Concern about Zebra or Quagga mussels
6005 Concern about complying with Senate Document 80
2701 Consider Denver Moffat Collection System Project in impacts
3153 Concern about West Slope ground water hydrology
3229 Concern about Three Lakes water quality
3901 Consider Grand County Stream Management Plan
6030 Other comments
3104 Concern about impact on Colorado River hydrology
3164 Concern about stream morphology/floodplain
3233 Concern lower flushing water quality
4001 Comment on proposed mitigation

James, Gorton T. (Denver, CO)

225 1008 Improved conservation plans should be developed

Jameson, Kathy (Fraser, CO)

73 1008 Improved conservation plans should be developed
3805 Concern about economic effects to Colorado River fishing
3304 Concern about aquatic life in Colorado River
6002 Opposes project
3804 Concern about economic effects to Colorado River boating

Johannes, Bob (Mtg.) (Fraser, CO)

74 2701 Consider Denver Moffat Collection System Project in impacts
3001 Concern about overall environmental impacts
6002 Opposes project

Johannes, Marie (Fraser, CO)

186 4021 Additional mitigation is needed

Johnson, Dave (Lafayette, CO)

944 6002 Opposes project

Johnson, David

75 3304 Concern about aquatic life in Colorado River
6002 Opposes project
3805 Concern about economic effects to Colorado River fishing
5001 Request for extension of comment period

Johnson, Diedrich

945 2701 Consider Denver Moffat Collection System Project in impacts
3210 Concern about Grand Lake water quality
3809 Concern about West Slope economic effects
3103 Comment on hydrologic model
3304 Concern about aquatic life in Colorado River
3901 Consider Grand County Stream Management Plan
3206 Concern about Colorado River water quality
3605 Concern about impact to agriculture

Johnson, Michael

187 3703 Concern about impact to boating in the Colorado River
3704 Concern about impact to fishing in the Colorado River

Johnson, Paul

76 6002 Opposes project

Johonnes, Bob

374 2701 Consider Denver Moffat Collection System Project in impacts

Kahn, Jonathan: Confluence Kayaks (Denver, CO)

1110 6005 Concern about complying with Senate Document 80

Kaplysh, Ted

77 1008 Improved conservation plans

should be developed

Kastengren, Jim: University of Colorado

78 3001 Concern about overall environmental impacts 5001 Request for extension of comment period

Kerr, Jeanne

79 1008 Improved conservation plans should be developed 3001 Concern about overall environmental impacts 4021 Additional mitigation is needed

6002 Opposes project

Keyser, John

80 1008 Improved conservation plans should be developed 3103 Comment on hydrologic model 3104 Concern about impact on Colorado River hydrology

4021 Additional mitigation is needed

Kilpatrick, W. Kirby

81 6002 Opposes project

Kitchens, Scott (Denver, CO)

226 4021 Additional mitigation is needed 6002 Opposes project

Klancke, Kirk: East Grand Water Quality Board (Fraser, CO)

376 1006 Believes conservation would eliminate need for project 2701 Consider Denver Moffat Collection System Project in impacts 3133 Concern about water rights

3210 Concern about Grand Lake water quality 3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed

Klancke, Marianne

1083 2701 Consider Denver Moffat Collection System Project in impacts 3901 Consider Grand County Stream Management Plan

Kleh, Cindy (Grand Lake, CO)

82 1008 Improved conservation plans should be developed 3815 Concern about impact to West Slope tourism 6002 Opposes project

Kohler, Mara (Winter Park, CO)

188 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3901 Consider Grand County Stream Management Plan

4021 Additional mitigation is needed

Kohler, Richard (Winter Park, CO)

83 1008 Improved conservation plans should be developed 6002 Opposes project

Kondratieff, Dr. Boris C.: Colorado State University (Fort Collins, CO)

189 3304 Concern about aquatic life in Colorado River

Koski, Carridy (Broomfield, CO)

84 1008 Improved conservation plans should be developed

Kratz, Allyn (Colorado Springs, CO)

1087 1008 Improved conservation plans should be developed 3231 Concern about increase in Colorado River temperature 3304 Concern about aquatic life in Colorado River

Krening, Daniel (Centennial, CO)

190 1008 Improved conservation plans should be developed 3704 Concern about impact to fishing in the Colorado River 6002 Opposes project

Lani, Kurt and Julene (Tabernash, CO)

191 1008 Improved conservation plans should be developed 3304 Concern about aquatic life in Colorado River 3305 Concern about aquatic life in Willow Creek

3809 Concern about West Slope economic effects

LaRocca, Rico

192 1008 Improved conservation plans should be developed

Lee, Stephen

86 1008 Improved conservation plans should be developed
3704 Concern about impact to fishing in the Colorado River
3206 Concern about Colorado River water quality
3703 Concern about impact to boating in the Colorado River

Legner, Diane (Bayfield, CO)

87 1008 Improved conservation plans should be developed
5001 Request for extension of comment period

Linin, Kim

88 1008 Improved conservation plans should be developed
3901 Consider Grand County Stream Management Plan
2701 Consider Denver Moffat Collection System Project in impacts
3210 Concern about Grand Lake water quality
4021 Additional mitigation is needed

Linn, Scott: Winter Park Optical (Fraser, CO)

1110 6005 Concern about complying with Senate Document 80

Lipke, Jeff

89 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
4021 Additional mitigation is needed

Lombardo, Aldo (Littleton, CO)

90 1007 Comment on water conservation

Long, Kimbal (Granby, CO)

957 3002 General concern about environmental impacts on the West Slope

Love, Linda

231 3304 Concern about aquatic life in Colorado River

Lucero, Deb (Tabernash, CO)

92 3001 Concern about overall environmental impacts

Lynd, Debra

194 3002 General concern about environmental impacts on the West Slope

MacGregor, Darcy (Mtg.) (Fraser, CO)

93 1008 Improved conservation plans should be developed
2602 Consider conservation as an alternative

MacPhail, Kristyn (Lakewood, CO)

94 1008 Improved conservation plans should be developed
4021 Additional mitigation is needed
5001 Request for extension of comment period

Martin, Seth: Devil's Thumb Ranch (Tabernash, CO)

1110 6005 Concern about complying with Senate Document 80

Matteson, John Drew (Fraser, CO)

233 1008 Improved conservation plans should be developed

234 2701 Consider Denver Moffat Collection System Project in impacts

McCollom, Scott (Broomfield, CO)

95 1008 Improved conservation plans
4021 Additional mitigation is needed
5001 Request for extension

of comment
should be developed period

McConnell, Charles

418 1008 Improved conservation plans should be developed 3901 Consider Grand County Stream Management Plan

McMillen, Keli: Prudential Winter Park Realtors (Winter Park, CO)

96 5001 Request for extension of comment period

McWilliams, Tom (Littleton, CO)

1095 2601 Construct a pipeline to avoid water deliveries to Grand Lake 3210 Concern about Grand Lake water quality 6005 Concern about complying with Senate Document 80

Medina, Rob: West Denver TU

196 6002 Opposes project

Mesec, Patricia F. (Littleton, CO)

97 1008 Improved conservation plans should be developed 3001 Concern about overall environmental impacts 6002 Opposes project

Metz, Jennifer: Fraser Valley Properties

98 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3210 Concern about Grand Lake water quality
3901 Consider Grand County Stream Management Plan 4021 Additional mitigation is needed 5001 Request for extension of comment period

Mierau, Dr. Gary (Denver, CO)

99 6002 Opposes project

Mierau, Jamie (Washington, DC)

100 1008 Improved conservation plans should be developed 4021 Additional mitigation is needed 5001 Request for extension of comment period

Mijer, Fritz (Denver, CO)

1098 1008 Improved conservation plans should be developed 4021 Additional mitigation is needed

Miller, Jean (Tabernash, CO)

102 1008 Improved conservation plans should be developed 4021 Additional mitigation is needed

Miller, Lane

101 6002 Opposes project

Miller, Ray (Grand Lake, CO)

383 2707 Effect of climate change should be evaluated 3002 General concern about environmental impacts on the West Slope 3206 Concern about Colorado River water quality
3210 Concern about Grand Lake water quality 4000 General mitigation comment

Miller, Ray (Mtg.) (Grand Lake, CO)

1099 1008 Improved conservation plans should be developed 2707 Effect of climate change should be evaluated 3210 Concern about Grand Lake water quality
3229 Concern about Three Lakes water quality 3231 Concern about increase in Colorado River temperature 3304 Concern about aquatic life in Colorado River
3422 Concern about impacts to West Slope wetlands and riparian habitat 4000 General mitigation comment

Misbach, Neal

103 1008 Improved conservation plans should be developed 2701 Consider Denver Moffat Collection System Project in impacts 3210 Concern about Grand Lake water quality
3901 Consider Grand County Stream 4021 Additional mitigation is needed 5001 Request for extension

of comment
Management Plan
period

Montgomery, Kent (Littleton, CO)

105 5001 Request for extension of comment period
6002 Opposes project

Moore, Arlan

1102 1008 Improved conservation plans should be developed

Morris, Katherine

384 3002 General concern about environmental impacts on the West Slope
3707 Concern about impact to recreation at Shadow Mountain Reservoir

Mortenson, Malene (Grand Lake, CO)

385 1007 Comment on water conservation change should be
1008 Improved conservation plans should be developed
2707 Effect of climate evaluated
3020 Other substantive comment on affected environment and effects

Mortenson, Malene (Mtg.)

106 1008 Improved conservation plans change should be
should be developed
2701 Consider Denver Moffat Collection System Project in impacts
2707 Effect of climate evaluated
3103 Comment on hydrologic model

Mulcahy, Patrick (Denver, CO)

197 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3304 Concern about aquatic life in Colorado River
4021 Additional mitigation is needed
5001 Request for extension of comment period

Nelson, Ron

107 1008 Improved conservation plans should be developed
6002 Opposes project

Neubecker, Ken (Carbondale, CO)

1104 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
2710 Evaluate cumulative effect of all transbasin diversions, including C-BT and Moffat
3104 Concern about impact on Colorado River hydrology
3206 Concern about Colorado River water quality
3304 Concern about aquatic life in Colorado River
4021 Additional mitigation is needed should be
4026 The Grand County Stream Management Plan should be used for mitigation
5005 A supplemental EIS prepared
6030 Other comments

Nielsen, Ed

198 6002 Opposes project

Nissen, Jerry (Fraser, CO)

109 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3210 Concern about Grand Lake water quality
4021 Additional mitigation is needed
5001 Request for extension of comment period

No Name (Mtg.)

4 1007 Comment on water conservation of comment
2601 Construct a pipeline to avoid water deliveries to Grand Lake
5001 Request for extension period
6005 Concern about complying with

		Senate Document 80				
	Nowak, Dave					
110	3206	Concern about Colorado River water quality	3304	Concern about aquatic life in Colorado River	6002	Opposes project
	Nowak, Linda					
111	3815	Concern about impact to West Slope tourism	6002	Opposes project		
	Nyberg, Harvey (Denver, CO)					
970	1008	Improved conservation plans should be developed	2710	Evaluate cumulative effect of all transbasin diversions, including C-BT and Moffat	6002	Opposes project
	O'Donnell, Bruce C (Grand Lake, CO)					
971	2601	Construct a pipeline to avoid water deliveries to Grand Lake	3210	Concern about Grand Lake water quality	6002	Opposes project
	6005	Concern about complying with Senate Document 80				
	Obmascik, Mark (Denver, CO)					
1153	3319	Comment on whirling disease for recreation	4016	Comment or suggested mitigation		
	O'Donnell, Bruce C. (Grand Lake, CO)					
1109	2601	Construct a pipeline to avoid water deliveries to Grand Lake	3210	Concern about Grand Lake water quality	6002	Opposes project
	6005	Concern about complying with Senate Document 80				
	Osborn, George (Hotchkiss, CO)					
238	4021	Additional mitigation is needed	6002	Opposes project		
	Pacheco, Jason (Mtg.) (Tabernash, CO)					
113	1008	Improved conservation plans should be developed				
	Palmer, Wes (Kremmling, CO)					
115	3304	Concern about aquatic life in Colorado River	6005	Concern about complying with Senate Document 80		
	Palmite, Eric (Mtg.) (Winter Park, CO)					
114	3704	Concern about impact to fishing in the Colorado River				
	Parks, Sarah					
116	1008	Improved conservation plans should be developed	6002	Opposes project		
	Pelaez, Jennifer (Fraser, CO)					
117	1008	Improved conservation plans should be developed	2102	Why isn't No Action the status quo	2701	Consider Denver Moffat Collection System Project in impacts
	3103	Comment on hydrologic model	3703	Concern about impact to boating in the Colorado River	4002	Comment or suggested mitigation for project in general
	4016	Comment or suggested mitigation for recreation				
	Petersen, Jack G. (Glenwood Springs, CO)					
201	3002	General concern about environmental impacts on the West Slope				
	Petersen, Pete and Carol: Colorado River Ranch (Kremmling, CO)					
118	3608	Concern about ability to divert water from the Colorado River	4015	Comment or suggested mitigation for land use		
	Peterson, Jim: Grand Lake					
119	1008	Improved conservation plans should be developed				

Peterson, Tom (Fort Collins, CO)

1143 2202 Comment supports Proposed Action

Pogoriler, Anne (Denver, CO)

120 1008 Improved conservation plans should be developed
4021 Additional mitigation is needed
5001 Request for extension of comment period

Powell, Helena: Adventures in White Water Rafting (Tabernash, CO)

121 2701 Consider Denver Moffat Collection System Project in impacts
3804 Concern about economic effects to Colorado River boating
5001 Request for extension of comment period

Ralch, Peter

391 2707 Effect of climate change should be evaluated
2708 Comment on mountain pine beetle trees
3153 Concern about West Slope ground water hydrology

Ralph, Peter

984 2707 Effect of climate change should be evaluated
2708 Comment on mountain pine beetle trees
3153 Concern about West Slope ground water hydrology

Raney, Pat: Grand Lake Shoreline Association

392 1008 Improved conservation plans should be developed
3210 Concern about Grand Lake water quality

Rau, Charles (Mtg.) (Fraser, CO)

122 2103 Comment supports No Action alternative
2600 Suggested new alternative
2701 Consider Denver Moffat Collection System Project in impacts
3206 Concern about Colorado River water quality

Ready, Terry W.

123 1008 Improved conservation plans should be developed

Reed, Dale

393 3209 Concern about Shadow Mountain to West Slope water quality
3719 Concern about West Slope recreation impacts
3815 Concern about impact to West Slope tourism
3820 Comment on other economic effects

Reed, Richard and Susan (Granby, CO)

1113 6002 Opposes project
6030 Other comments

Reid, Chuck (Littleton, CO)

124 1008 Improved conservation plans should be developed
3001 Concern about overall environmental impacts
3809 Concern about West Slope economic effects

Reynolds, Rich (Evergreen, CO)

989 1008 Improved conservation plans should be developed
3104 Concern about impact on Colorado River hydrology
3231 Concern about increase in Colorado River temperature
3304 Concern about aquatic life in Colorado River

Rich, Robert S. (Granby, CO)

241 3002 General concern about Colorado River environmental impacts on the West Slope
3153 Concern about West Slope ground water hydrology
3206 Concern about water quality
3231 Concern about increase in to bird life Colorado River temperature
3422 Concern about impacts to West Slope wetlands and riparian habitat
3511 Concern about effects along Colorado River
3608 Concern about ability to divert

water from the Colorado River

Rinker, Robert A. (Aurora, CO)

202 1008 Improved conservation plans should be developed

Risch, Lee

242 1008 Improved conservation plans should be developed

Roark, Len

420 2202 Comment supports Proposed Action

Rozean, Bonnie (Granby, CO)

243 6002 Opposes project

Rudis, Mark A. (Winter Park, CO)

126 6000 Other Comments

Sage, Fred (Boulder, CO)

993 6030 Other comments

Salisbury, John and Alicia

128 3210 Concern about Grand Lake water quality 6002 Opposes project

Saltzman, Ed (Grand Lake, CO)

129 6002 Opposes project

Schmidt, Carol and Jim

1115 1007 Comment on water conservation Moffat Collection should be developed 1008 Improved conservation plans should be developed 2701 Consider Denver System Project in impacts
2720 Other substantive comment on cumulative effects and reasonable foreseeable actions 3104 Concern about impact on Colorado River hydrology 3153 Concern about West Slope ground water hydrology
3210 Concern about Grand Lake water quality 3231 Concern about increase in Colorado River temperature 3304 Concern about aquatic life in Colorado River
3552 Concern about impacts to Colorado River endangered fish 3604 Concern about impact to private property 3704 Concern about impact to fishing in the Colorado River
3809 Concern about West Slope economic effects should be used for mitigation 4001 Comment on proposed mitigation 4026 The Grand County Stream Management Plan
6002 Opposes project

Schmuck, Carl

996 1008 Improved conservation plans should be developed 3133 Concern about water rights

Schmuck, Gary (Thornton, CO)

997 3133 Concern about water rights Colorado River 3304 Concern about aquatic life in 6002 Opposes project

Schroeder, Fred (Grand Lake, CO)

1144 2601 Construct a pipeline to avoid water deliveries to Grand Lake 4006 Comment or suggested mitigation for water quality 6002 Opposes project

Shaffer, Gay (Grand Lake, CO)

394 3210 Concern about Grand Lake water quality 6002 Opposes project

Sidofsky, Carol (Winter Park, CO)

1116 1008 Improved conservation plans should be developed 3104 Concern about impact on Colorado River hydrology 3210 Concern about Grand Lake water quality
3304 Concern about aquatic life in Stream 3815 Concern about impact to West 3901 Consider Grand County

Colorado River
Slope tourism
Management Plan

6030 Other comments

Slater, Linda (Westminster, CO)

132 3001 Concern about overall environmental impacts

Smith Jr., Douglas M.

245 6002 Opposes project

Smith, Douglas

395 1008 Improved conservation plans should be developed
2103 Comment supports No Action alternative
3304 Concern about aquatic life in Colorado River
3306 Concern about aquatic life in Granby Reservoir
5001 Request for extension of comment period

Soles, Dennis K. (Fraser, CO)

133 2701 Consider Denver Moffat Collection System Project in impacts additional WTP requirements with lower flows
3001 Concern about overall environmental impacts
3232 Concern about and/or WWTP
3901 Consider Grand County Stream Management Plan

Solomon, Leon

134 6002 Opposes project

Sorter, Jason

421 3001 Concern about overall environmental impacts
4021 Additional mitigation is needed

Southway, Cindy (Grand Lake, CO)

135 4001 Comment on proposed mitigation
4020 Other suggested mitigation
6000 Other Comments
1009 1003 Believes project is not necessary
1008 Improved conservation plans should be developed
2103 Comment supports No Action alternative
3101 Comment on West Slope affected environment hydrology
3203 Comment on Three Lake water quality model
3209 Concern about Shadow Mountain water quality
3210 Concern about Grand Lake water quality
3213 Other comment on West Slope water quality
3608 Concern about ability to divert water from the Colorado River
3703 Concern about impact to boating in the Colorado River
3719 Concern about West Slope recreation impacts
3777 Other comments on West Slope visual quality
3809 Concern about West Slope economic effects
4000 General mitigation comment
4006 Comment or suggested mitigation for water quality
4016 Comment or suggested mitigation for recreation should be used for mitigation
4020 Other suggested mitigation
4026 The Grand County Stream Management Plan
5006 The WGFP and Moffat Project should be combined in one EIS
6030 Other comments

Stahl, John

397 3203 Comment on Three Lake water quality model
3210 Concern about Grand Lake water quality

Stahl, Rosie

137 6000 Other Comments

Stanko, Paul

138 3002 General concern about environmental impacts on the West Slope

Stark, George

1011 3005 Concern that EIS inadequately addresses the environmental impacts

6002 Opposes project

Stauffer, Norman (Grand Lake, CO)

1146 3231 Concern about increase in Colorado River temperature

3304 Concern about aquatic life in Colorado River

3815 Concern about impact to West Slope tourism

4007 Comment or suggested mitigation for aquatic resources

Stenicka, John (Fraser, CO)

139 1008 Improved conservation plans should be developed

5001 Request for extension of comment period

Stockley, Karen (Berthoud, CO)

422 1008 Improved conservation plans should be developed

2600 Suggested new alternative

2603 Consider non-structural alternatives such as water conservation and dry year leasing of irrigation water

3423 Concern about impacts to East Slope wetlands and riparian habitat

3506 Concern about impacts to wildlife at Chimney Hollow Reservoir

3607 Concern about impacts to traffic

4009 Comment or suggested mitigation for wildlife

Stow, John

140 3001 Concern about overall economic effects to environmental impacts

3804 Concern about economic effects to Colorado River boating

3805 Concern about Colorado River fishing

Straka, Gayle

141 4003 Comment or suggested mitigation for surface water flow

6002 Opposes project

Strauss, Richard (Arvada, CO)

1017 3231 Concern about increase in Colorado River temperature

3304 Concern about aquatic life in Colorado River

1018 6030 Other comments

Streb, Bob: Fly Fishing Outfitters (Avon, CO)

1110 6005 Concern about complying with Senate Document 80

Strohmeier, Scott (Arvada, CO)

142 1008 Improved conservation plans should be developed

3001 Concern about overall environmental impacts

4021 Additional mitigation is needed

6002 Opposes project

Sullivan, Jim and Martha

203 1008 Improved conservation plans should be developed

4021 Additional mitigation is needed

Sutherland, Jason

143 1008 Improved conservation plans should be developed

2601 Construct a pipeline to avoid water deliveries to Grand Lake

3209 Concern about Shadow Mountain water quality

3210 Concern about Grand Lake water quality

Taylor, LeRoy (Winter Park, CO)

144 1003 Believes project is not necessary

1008 Improved conservation plans

2701 Consider Denver Moffat Collection

should be developed System Project in impacts

Tetreault, Josh (Lakewood, CO)

145 1008 Improved conservation plans should be developed
3703 Concern about impact to boating in the Colorado River
3704 Concern about impact to fishing in the Colorado River
3805 Concern about economic effects to Colorado River fishing
6002 Opposes project

Thompson, Anita (Kremmling, CO)

1122 6002 Opposes project

Thompson, Bill

1140 3608 Concern about ability to divert water from the Colorado River
6005 Concern about complying with Senate Document 80

Thompson, Bill (Kremmling, CO)

146 3608 Concern about ability to divert water from the Colorado River

Thompson, Jeff (Longmont, CO)

423 1002 Does not agree with purpose and/or need
5001 Request for extension of comment period

1123 1002 Does not agree with purpose and/or need
1005 Concern about projected water demand
3005 Concern that EIS inadequately addresses the environmental impacts

Thompson, Wendy (Kremmling, CO)

147 4002 Comment or suggested mitigation for project in general

399 3608 Concern about ability to divert water from the Colorado River

Thorpe, Robert W.: R.W. Thorpe & Associates, Inc. (Seattle, WA)

148 2202 Comment supports Proposed Action
4015 Comment or suggested mitigation for land use

Tod, Marty

149 1008 Improved conservation plans should be developed
2103 Comment supports No Action alternative
3002 General concern about environmental impacts on the West Slope
6002 Opposes project

Trammell, John (Grand Junction, CO)

248 1008 Improved conservation plans should be developed
2707 Effect of climate change should be evaluated

Turnbull, William and Kathleen (Granby, CO)

151 1008 Improved conservation plans should be developed
2701 Consider Denver Moffat Collection System Project in impacts
3809 Concern about West Slope economic effects
3901 Consider Grand County Stream Management Plan
4021 Additional mitigation is needed
6002 Opposes project

Vail, Mike: Water Legacy

205 1007 Comment on water conservation
1008 Improved conservation plans should be developed

Van Horn, Jack (Fraser, CO)

153 1008 Improved conservation plans should be developed

Varney, Larry (Grand Lake, CO)

154 3153 Concern about West Slope ground water hydrology
4021 Additional mitigation is needed
6002 Opposes project

Venezia, Howard (Winter Park, CO)

155 1008 Improved conservation plans should be developed
6002 Opposes project

Voelker, John

1030 3206 Concern about Colorado River water quality
6002 Opposes project

VonHolt, Nicole (Granby, CO)

1128 3001 Concern about overall environmental impacts
6002 Opposes project

Walck, Gregory

249 3304 Concern about aquatic life in Colorado River

Waldow, Eileen (Fraser, CO)

1129 1008 Improved conservation plans should be developed
3001 Concern about overall environmental impacts

Waldow, Tom

1130 1008 Improved conservation plans should be developed

Waldron, Lloyd (Tabernash, CO)

156 1006 Believes conservation would eliminate need for project impacts
3002 General concern about environmental impacts on the West Slope
6002 Opposes project
1008 Improved conservation plans should be developed
3719 Concern about West Slope recreation impacts
2701 Consider Denver Moffat Collection System Project in scope of comment
5001 Request for extension period

Walker, Richard

1034 3422 Concern about impacts to West Slope wetlands and riparian habitat
3809 Concern about West Slope economic effects
6002 Opposes project

Ward, Steve

157 1008 Improved conservation plans should be developed
3703 Concern about impact to boating in the Colorado River
3804 Concern about Colorado River boating economic effects to
3805 Concern about economic effects to Colorado River fishing

Warrens, Bob

250 1008 Improved conservation plans should be developed
3002 General concern about environmental impacts on the West Slope

Watts, Frank and Jane (Tabernash, CO)

158 1008 Improved conservation plans should be developed
3002 General concern about environmental impacts on the West Slope
3104 Concern about impact on Colorado River hydrology

Weary Jr., Robert

251 4021 Additional mitigation is needed

Weber, Dorothy (Grand Lake, CO)

1144 2601 Construct a pipeline to avoid water deliveries to Grand Lake
4006 Comment or suggested mitigation for water quality
6002 Opposes project

Wegner, David (Durango, CO)

1132 1007 Comment on water conservation comment on reasonable
2707 Effect of climate change should be evaluated
2720 Other substantive cumulative effects and foreseeable actions

Wells, Gail (Centennial, CO)

159 1008 Improved conservation plans should be developed
3703 Concern about impact to boating in the Colorado River

Westerlund, Jon (Winter Park, CO)

1039 1006 Believes conservation would eliminate need for project
6002 Opposes project
3001 Concern about overall environmental impacts
4000 General mitigation comment

Weston, Mary Ann

424 2501 General comment on Alternative 5

Weydert, Tom: Town of Grand Lake

402 1008 Improved conservation plans should be developed
3901 Consider Grand County Stream Management Plan
2701 Consider Denver Moffat Collection System Project in impacts
5001 Request for extension of comment period
3210 Concern about Grand Lake water quality

Whitten, Holly

69 1008 Improved conservation plans should be developed
3001 Concern about overall environmental impacts
5001 Request for extension of comment period

Wiegand, Jim

425 2001 General comment about alternatives
6030 Other comments
3129 Concern about Horsetooth Reservoir hydrology
3609 General comment on land use

Wiegers, Alex: Wiegers Capital Partners LLC (Denver, CO)

160 3164 Concern about Colorado River stream morphology/floodplain
3304 Concern about aquatic life in Colorado River
4021 Additional mitigation is needed

Wilcox, Brody

161 1008 Improved conservation plans should be developed
3142 Concern about diverting water from the Fraser River

Wilcox, Douglas

162 3002 General concern about environmental impacts on the West Slope
6002 Opposes project

Williams, Dr. W.J. (Boulder, CO)

1133 4020 Other suggested mitigation

Wilson, Noel (Tabernash, CO)

1134 3001 Concern about overall environmental impacts

Wilson, Robert M. (Kremmling, CO)

207 1008 Improved conservation plans should be developed
3206 Concern about Colorado River water quality
2103 Comment supports No Action alternative
3104 Concern about impact on Colorado River hydrology

Winkleman, Scott

163 1008 Improved conservation plans should be developed
3703 Concern about impact to boating in the Colorado River

Wofford, Mitchell (Granby, CO)

1152 2602 Consider conservation as an alternative
3164 Concern about Colorado River stream morphology/floodplain
3815 Concern about impact to West Slope tourism

Wolters, Jason

164 1008 Improved conservation plans should be developed
3703 Concern about impact to boating in the Colorado River

Wood, Carl (Parshall, CO)

165 2001 General comment about alternatives
3132 Concern about WGFP yield

Wottowa, Peter (Englewood, CO)

166 1008 Improved conservation plans should be developed
6002 Opposes project

Wysocki PhD, Lawrence (Denver, CO)

1047 1007 Comment on water conservation
2720 Other substantive comment on cumulative effects and reasonable foreseeable actions

Young, Brian and Stephanie (Granby, CO)

167 2701 Consider Denver Moffat Collection System Project in impacts
3206 Concern about Colorado River water quality
3304 Concern about aquatic life in Colorado River
3552 Concern about impacts to Colorado River endangered fish
3809 Concern about West Slope economic effects
3901 Consider Grand County Management Plan
6002 Opposes project

Young, John

208 1008 Improved conservation plans should be developed
6002 Opposes project

Yust, Jim: Yust Ranch (Kremmling, CO)

168 1008 Improved conservation plans should be developed
2601 Construct a pipeline to avoid water deliveries to Grand Lake
3133 Concern about water rights
6005 Concern about complying with Senate Document 80
6030 Other comments

Zastrow, Holly

209 1008 Improved conservation plans should be developed
4021 Additional mitigation is needed

Zwick, Melanie (Winter Park, CO)

169 1008 Improved conservation plans should be developed
3002 General concern about environmental impacts on the West Slope
3229 Concern about Three Lakes water quality
3809 Concern about West Slope economic effects
3901 Consider Grand County Stream Management Plan
5001 Request for extension of comment period

Response to Individual Comments by Topic

1000 Purpose and Need

Comment: The purpose and need of the project is too narrow and limits the range of alternatives analyzed.

Response: The WGFP was initiated by the Participants because the original Windy Gap Project failed to deliver the yields that were anticipated in the 1981 EIS for the reasons discussed in more detail in Section 1.5 of the WGFP FEIS, including insufficient storage. To address the shortcomings of the Windy Gap Project, Participants determined that a cooperative project with shared storage in a new reservoir(s) would be the most efficient way to collectively firm their Windy Gap water supply. Windy Gap absolute water rights represent an existing source of water available to the Participants; however, additional infrastructure is necessary to provide reliable deliveries of this water. Thus, the purpose of the WGFP is to fix a broken project, not to develop new sources of water. Many of the WGFP Participants have additional future water needs beyond what the WGFP would supply, and will be investigating other sources of water to meet those needs. The WGFP is only functional as a collaborative effort on the part of Windy Gap Project unit holders.

Comment: The purpose and need should explain why the WGFP Participants need to meet drought year water supply needs rather than meeting average year needs and using drought management measures in drought years.

Response: Municipalities, water districts, and industrial water users require a reliable water supply for meeting demands over a reasonable range of hydrologic conditions. Reliance on an average water supply yield means that about half of the time water supplies are inadequate. The intent of the WGFP, like most reservoir projects, is to capture and store water during wet years so that it will be available during dry years. While it is generally not feasible to store sufficient water for severe droughts, reservoir storage does allow water providers to meet needs without instigating drought management measures every time yield falls below average.

Comment: The future water demand by WGFP Participants is based on population projections that are outdated in light of current economic conditions and should be updated.

Response: Reclamation and CEQ guidance on developing NEPA documents requires that agencies use the best available information. The recession has indeed had an impact on growth in the past 2 years in many previously fast-growing areas, and the Participant service areas are no exception. However, recessions are short-term economic phenomena, similar to economic boom growth. Long-term growth projections are normalized to "smooth out" cyclical high- and low-growth periods. The Colorado State Demographer's Office prepares updated statewide and county-level population projections each year. These projections incorporate local information and input, and are continually adjusted to reflect current economic conditions. The November 2008 projections show that for the counties in which the Participants are located, projected average annual growth rates range from 1.1 to 3.1 percent between 2005 and 2030. These recently projected rates are in line with those used for the WGFP Participants in the FEIS analysis and are consistent projections from Colorado's State Water Supply Initiative for the South Platte basin.

Comment: The Platte River Power Authority's future demand for water for power generation is overstated. Water needs will diminish in the future as renewable energy sources replace coal and natural gas power generation.

Response: The Platte River Power Authority (Platte River) currently provides electric service to Estes Park, Fort Collins, Loveland, and Longmont. Platte River's need to firm Windy Gap water is based on providing a reliable supply to meet the current needs of the Rawhide Power facility, not a new facility. Platte River must be able to provide reliable service to existing customers, and the Windy Gap Project has not provided reliable water deliveries as originally anticipated. The population projections made for Loveland and Longmont in the EIS, and the growth assumed for Estes Park and Fort Collins, do not factor into Platte River's need for the WGFP. Platte River is evaluating its options for additional power generation to meet future demands. New power could come from a variety of sources, several of which may require less water than the current coal-fired plant, but meeting those needs and any associated water requirement is beyond the purpose of the WGFP.

Comment: The FEIS should disclose other future sources of water supply available to the City of Longmont, including additional water available for reuse besides Windy Gap water.

Response: Information on the City of Longmont water supplies was collected from the City and the Raw Water Master Plan. Longmont obtains reuse water from municipal sources decreed for reuse and Windy Gap water when it is available. Additional information on Longmont's water supply is found in the WGFP Purpose and Need Report (ERO Resources and Harvey Economics 2005).

Comment: The EIS should provide a comparison of current gallons per capita per day (gpcd) values and those anticipated at buildout, as well as current and buildout populations.

Response: Section _1.6.2.3 in the FEIS on *Water Conservation* contains information on gpcd values for the Participants. Specific gpcd values at buildout are unknown. All of the Participants have conservation measures in place, and as the response to the next comment indicates, they will be periodically updating and implementing conservation measures in the future. Thus, gpcd values are expected to decrease in the future. The EIS includes information on Participant population projections to the year 2030.

Comment: Windy Gap Participants should increase conservation practices before building a new project and Reclamation should require Participants to implement additional conservation.

Response: The WGFP Participants will be required to maintain an approved water conservation plan in accordance with the Water Conservation Act of 2004 (Colorado House Bill 04-1365) as amended. Seven of the WGFP Participants have Colorado Water Conservation Board (CWCB)-approved plans. These participants will be required to maintain the plans in accordance with the requirements of the Water Conservation Act of 2004, as amended, and the remaining participants, will be required to acquire a CWCB-approved plan prior to delivery of WGFP water. Reclamation would require maintenance of a state-approved water conservation plan as a condition to a contract with the Subdistrict. New participants that acquire WG shares from WGFP participants after the project is completed will also be required to have an approved plan in accordance with the requirements of the Water Conservation Act of 2004, as amended.

Comment: The City of Longmont's firm water supply is higher than disclosed in the EIS and projected need for water is overstated.

Response: The Purpose and Need Report (ERO Resources and Harvey Economics 2005) developed for the EIS included an evaluation of the water supply and demands for the City of Longmont and all of the Participants. Reclamation believes the analysis of Longmont's water supply and projected future demands are reasonable and support their participation in the WGFP.

2000 Alternatives

Comment: The No Action Alternative includes additional Windy Gap pumping and enlargement of Ralph Price Reservoir, so it is not really a no action alternative.

Response: The No Action Alternative presents what WGFP Participants would do if Reclamation does not allow the proposed connections to C-BT facilities. Consistent with CEQ guidance on what should be considered in a No Action alternative, it does not mean that agencies stop what they are doing. In the case of existing agreements, prior court decisions and CEQ guidance would define No Action as no change to existing agreements. For WG and the WGFP this means that Reclamation would continue operation under the existing agreement between Reclamation and the Subdistrict for conveyance of WG water through the C-BT Project system. (See CEQ 40 Questions, #3) This also includes foreseeable actions by the participants. For most Participants, this includes continuing to take Windy Gap deliveries and increasing those deliveries as water demand increases within the capacity of the existing Windy Gap Project facilities and available storage in Granby Reservoir. One Participant would drop out of the WGFP. The City of Longmont would pursue enlargement of Ralph Price Reservoir to store its Windy Gap water. While there is no guarantee that enlargement of Ralph Price Reservoir would acquire all of the regulatory authorizations, it is a reasonable action for the City of Longmont, and no fatal flaws were discovered in review of this alternative in the WGFP EIS. The majority of the hydrologic impacts, included under the No Action alternative entail increased Windy Gap diversions by participants which they can currently do without any infrastructure changes or additional authorizations or approvals from Reclamation. It is unreasonable to assume that Windy Gap diversions would remain status quo under the No Action Alternative or that the No Action alternative should be no diversions.

Comment: Municipalities and counties have jurisdiction over water service areas and have the ability to not expand their service areas or approve developments if demand will exceed water supplies. Thus, Participants have control over their water needs. The EIS should look at the environmental effects of municipalities and counties not approving annexation and development.

Response: The EIS discloses and evaluates the impact of the identified alternatives. The No Action Alternative is based on projected future water demand for the Participant's and not the specific decisions on that municipalities make on annexations and zoning.

Comment: The EIS should evaluate the impact of municipalities and counties approving annexations and development applications.

Response: Water demands were based on projected future water needs of the Participants and not the specific decisions that municipalities make on annexations and zoning. Indirect development-related impacts were not evaluated in the FEIS because population growth in the communities served by the WGFP is expected to occur regardless of the decision on whether to implement the project, and any effects would be similar for all alternatives.

Comment: Spring Garden Inc. requests a pipeline out of Chimney Hollow Reservoir to the Little Thompson drainage for delivery of C-BT water to District members.

Response: C-BT Project water will continue to be delivered to the District as it is now delivered. Construction of Chimney Hollow Reservoir will not change how C-BT Project water is delivered.

Comment: Why not build both Chimney Hollow and Dry Creek Reservoirs to provide additional storage and opportunities for exchanges?

Response: The proposed 90,000 AF Chimney Hollow Reservoir provides all the storage required to meet the purpose and need of the WGFP. Increasing East Slope storage would not improve yield substantially. Two East Slope reservoirs are not needed to meet the purpose and need of the proposed action.

Comment: Consider water from sources other than the Colorado River, such as the Poudre River, Yampa Project, or transfer of agricultural water rights for municipal use.

Response: The purpose of the WGFP is to improve the firm yield of the existing WGFP and the Participant's existing water rights which are from the Colorado River.

Comment: Additional water should be stored in Granby Reservoir.

Response: The WGFP may store water in Granby Reservoir only when space is available and not being used to store C-BT Project water. If Granby Reservoir fills, there is no space for Windy Gap water and any Windy Gap water already in Granby Reservoir is spilled. Thus, the need for additional storage outside of Granby Reservoir.

Comment: Consider storage of water in gravel pits.

Response: Gravel pits would not provide sufficient storage for 90,000 AF of water.

Comment: The EIS should consider a wider range of alternatives for meeting Participant water supply needs.

Response: The alternatives selection process included evaluation of 171 different project elements and multiple combinations of features. The alternatives analysis considered new reservoir sites, enlargement of existing reservoirs, aquifer storage, and reregulation of existing reservoirs. In addition, nonstructural and institutional measures were considered such as borrowing or integration with the Colorado-Big Thompson (C-BT) Project, interruptible supply contracts, purchase/leaseback arrangements and dry year options on C-BT units, and integration with Denver Water's raw water and treated water system. Alternatives were screened using Clean Water Act 404(b)(1) Guidelines, in cooperation with the U.S. Army Corps of Engineers to identify a range of reasonable alternatives that would minimize environmental impacts and meet the project purpose and need. See also response to comments on the project purpose and need in Section 1000 above.

Comment: Consider non-structural alternatives such as water conservation and dry year leasing of irrigation water.

Response: All of the WGFP Participants have implemented conservation measures, and are continuing to evaluate additional measures to reduce water demand and extend supplies. As previously stated, WGFP Participants have committed to maintaining a state-approved water conservation plan prior to delivery of any WGFP water. While conservation is a key component of meeting existing and future water needs for all of the Participants, firming delivery from existing sources of water supply, such as the WGFP, also is needed to meet projected demands. Continued improvements in water conservation may delay the need for additional water, but projected population growth and business development will require additional water supplies. WGFP Participants may individually consider other sources of water supply to meet water needs not satisfied by the WGFP and planned conservation measures. Dry year leasing would not provide a reliable every year supply of water to meet future water needs.

Comment: Instead of pumping Windy Gap and C-BT water from Granby Reservoir to Shadow Mountain Reservoir, water should be routed around Shadow Mountain and Grand Lake to improve lake water quality.

Response: Modifications in C-BT facilities around Grand Lake is beyond the scope of the proposed WGFP. Modifications to C-BT facilities would require Congressional authorization, funding, and review under the National Environmental Policy Act.

2700 Reasonably Foreseeable Actions

Comment: The EIS should consider the cumulative impacts associated with both the WGFP and the Moffat Collection System Project.

Response: The WGFP FEIS fully considered the cumulative impacts of the Moffat Collection System Project, as well as other reasonably foreseeable future actions. The cumulative effects analysis included hydrologic modeling of the Moffat Project including changes in Fraser River, Williams Fork, and Blue River flows. Hydrologic impacts of the Moffat Project are actually overstated in the WGFP analysis because Denver's Blue River demands are 30,000 AF less than used in the hydrologic modeling for the WGFP. Denver Water changed their Blue River demand after the hydrologic modeling for the WGFP was completed. The cumulative effects analysis for water quality, aquatics, and other resources were analyzed in the same level of detail as the direct impact of the WGFP.

Comment: The cumulative effects analysis should consider the historical impacts associated with the Colorado-Big Thompson Project, Denver Water, past Windy Gap operations, and any anticipated future projects.

Response: The affected environment sections of the EIS, particularly the Surface Water Hydrology section, describe historical hydrologic conditions and the various actions and projects that have contributed to existing conditions. The same models used to assess the direct hydrologic impact of the alternatives were used to evaluate the cumulative hydrologic impacts. The hydrologic model incorporated all past actions that have affected, and continue to affect hydrology, with the estimated hydrologic consequences of all reasonably foreseeable future actions and the effect of the WGFP alternatives. Hydrologic modeling of cumulative impacts, which included past, present, and reasonably foreseeable actions, was then used to evaluate impacts to other water-dependent resources. Tables 3-1 and 3-20 were added to the FEIS to better illustrate the effect of past and current actions on Colorado River streamflow. The existing hydrologic conditions presented in the EIS provide an accurate baseline from which to then make reasonable comparisons of the impacts of each of the alternatives.

Comment: Climate change and the potential impacts on precipitation, temperature, and runoff should be considered as a reasonably foreseeable action.

Response: The potential for climate change, both globally and in Colorado, and in the Upper Colorado River basin where Windy Gap diversions are located, has been identified by a variety of studies. The amount and direction of climatic change has been investigated in several studies. Although differences in climate model results demonstrate the uncertainty in projecting future climate conditions, the anticipated effects of warmer temperatures in the Colorado River basin upstream of Windy Gap, as identified by a recent Colorado Water Conservation Board report (CWCB 2010), include:

- Average annual runoff increases by about 5 percent;
- Average year-round temperature increase of about 1.8°C;

- Peak runoff in May rather than June as currently happens;
- Higher than current average runoff in April and May;
- Lower than current average runoff in the late summer-fall months;
- Decreased baseflow from ground water in late summer;
- Reduced soil moisture in summer and longer growing seasons extended by an estimated 18 days split equally between the spring and fall;
- A shift from snow to rain in the early and late winter months due to increased temperatures; and
- Greater loss of water by evapotranspiration.

The discussion of climate change in Section 2.8.2 Reasonably Foreseeable Actions was updated in the FEIS to include information from recent publications on climatic change trends in the Upper Colorado River basin and possible future changes. Potential environmental impacts from climate change are qualitatively evaluated as part of the cumulative effects evaluation for applicable resources in Chapter 3 of the FEIS.

Comment: Pine beetle-killed trees have the potential for hydrologic and water quality impacts in the upper Colorado River basin and should be evaluated in the EIS.

Response: A quantitative evaluation of the effects of pine bark beetle infestation on hydrology and water quality is difficult to accurately predict because of the numerous assumptions that would be necessary. The FEIS indicates the types of effects that could occur as a result of pine beetle-killed trees, such as wildfire, increased runoff, greater sediment and nutrient delivery to streams, and higher stream temperatures. These impacts are possible with or without the WGFP, and would be similar for all of the alternatives. Additional discussion was added in Section 2.8.2.1 of the FEIS on the potential impact of pine bark beetle-killed trees. Proposed nutrient and temperature mitigation measures on the West Slope, as described in Section 3.25 of the FEIS, would help address some of the potential effects from pine bark beetle-killed trees.

Comment: The linkage between the WGFP and the Northern Integrated Supply Project (NISP) on the East Slope should be disclosed and considered in cumulative effects discussion.

Response: Five of the WGFP Participants—Central Weld County Water District, Erie, Evans, Fort Lupton, and Lafayette—are also participants in NISP. These entities have identified future water needs that will require multiple sources of water. Section 1.7 of the FEIS includes additional information on the Participants' anticipated yield from NISP and the WGFP in relation to their overall future water needs.

Windy Gap water could potentially be rented by NISP participants as part of the initial fill of Glade Reservoir. NISP participants can either collectively or separately rent Windy Gap water from Windy Gap Participants. If the rented, Windy Gap water greater than the Participants' need for a year, could then be delivered into Glade Reservoir. The water would be delivered to NISP from Horsetooth Reservoir through the Windsor Extension into the Poudre Valley Canal. Should Windy Gap water be used for the initial fill of Glade Reservoir, it would have minimal cumulative impact since it merely changes the delivery location of WGFP Participants' water.

3100 Surface Water Hydrology and Water Rights

Comment: The hydrologic analysis should include drought years such as 2002.

Response: The modeling effort for the WGFP began in 2000. At that time, the decision was made to end the study period in 1996 because data required for the model (e.g., flow, diversion,

evaporation, and precipitation) were readily available through that year and the State's CDSS Model study period also ended in 1996. The need to extend the WGFP model study period was evaluated to determine whether a study period that includes recent hydrology (1997–2003), and in particular the 2002 drought year, would change conclusions regarding associated hydrologic changes and WGFP yields. Key conclusions of that analysis are as follows:

- The addition of a WGFP reservoir would not change Colorado River flows in a year like 2002. Windy Gap water rights did not come into priority in 2002, and the addition of a WGFP reservoir would not change that condition. Therefore, Windy Gap would not divert in a dry year like 2002 with or without a WGFP reservoir because Windy Gap diversions would be limited by the amount physically and legally available as opposed to available storage capacity.
- The WGFP firm yield would not change if the model period was extended through 2002. A comparison of model output for the 1950–1996 study period with the period from 1997–2003 shows other sequences of years within the 1950–1996 study period that are more critical than 2002 with respect to Windy Gap yield.

The current model study period from 1950–1996 includes several series of dry years followed by wet years, which illustrate the effects of increased diversions to refill Windy Gap firming storage. Reclamation determined that the model study period is suitable for estimating hydrologic effects associated with the EIS alternatives for both direct effects and cumulative effects because it includes a broad range of average, wet, and dry years, and sequences of years that include dry years followed by wet years.

Comment: Hydrologic modeling should consider a longer period of time (500 years) to recognize the variability in Colorado River flows.

Response: The model study period from 1950 through 1996 is suitable for estimating hydrologic effects associated with the EIS alternatives because it includes a broad range of average, wet, and dry years, and sequences of years that include dry years followed by wet years. The current model study period from 1950 through 1996 includes several series of dry years followed by wet years, which illustrate the effects of increased diversions to refill Windy Gap firming storage. While tree ring-based reconstructions of Colorado River flows may reveal greater hydrologic variability than that reflected in the gaged record, particularly with respect to drought, the inclusion of more severe dry years in the study period would not change the evaluation of hydrologic impacts due to the WGFP. As shown by the evaluation of dry years included in the gaged record from 1950 through 1996, the addition of a WGFP reservoir would not change Colorado River flows in a dry year. Windy Gap water rights would not come into priority in a dry year and the addition of a WGFP reservoir would not change that condition. Windy Gap would not divert in a dry year with or without a WGFP reservoir because Windy Gap diversions would be limited by the amount of water legally available as opposed to available storage capacity.

Changes in snowpack and streamflow timing and magnitude associated with climate change may affect Windy Gap diversions and firming reservoir operations. If runoff decreases and shifts earlier in the year, Windy Gap diversions also would occur earlier and may decrease if the call on the Colorado River comes on sooner and is extended because Windy Gap water rights are relatively junior. If runoff increases and shifts earlier in the year, Windy Gap diversions could increase if the call comes on later and there is more water physically and legally available to divert. If runoff occurs earlier in the spring, the yield of the WGFP could decrease because of pipeline capacity and water rights decree constraints. To some degree, Granby Reservoir operations would buffer changes in the timing and magnitude of streamflows above Granby

Reservoir due to climate change. For example, if runoff increases above Granby Reservoir, more water would likely be stored and there would potentially be little change in outflow in years the reservoir does not spill. If runoff increases on average above the reservoir, Granby Reservoir outflow would likely increase in spill years and the spill could potentially occur sooner and the inverse would occur if runoff decreases on average. Flows in the Colorado River below Windy Gap would change if there are changes in the timing and magnitude of Windy Gap diversions, spills from Granby Reservoir, and inflows from Willow Creek and the Fraser River. If evaporation rates increase, then evaporative losses at firming project reservoirs would increase. Evaporative losses could also increase or decrease if Windy Gap diversions to storage change. This could result in increased Windy Gap diversions at times to replace those additional losses and/or reduce WGFP firm yields.

Climate change was not reflected in the WGFP hydrologic model due to varied predictions in the magnitude and direction of climatic changes, and the uncertainty in determining incremental changes in streamflow or reservoir levels associated with increasing or decreasing temperatures and precipitation.

Comment: The average peak flows through Byers Canyon was more than double what it is after 1986; therefore, using any of this data will yield statistics that are misleading and inaccurate and are probably being used intentionally to skew numbers in favor of more diversions. Only years with current levels of diversions should be used in the EIS.

Response: The comment suggests that only years with current levels of diversions should be used in the DEIS because USGS data shows that before 1986, the average peak flows through Byers Canyon were more than double what they were after 1986. The purpose of including years prior to 1986 in the analysis is to reflect the potential impacts of the WGFP under a variety of hydrologic conditions. The WGFP model starts with baseflows at each modeled location. Baseflows are defined as gaged flows plus adjustments for historical reservoir releases and filling, diversions, and gaged inflows such as wastewater treatment plant effluent discharges and irrigation ditch returns to the river. Therefore, baseflows are as full a depiction as possible of the unregulated flow or hydrologic conditions that would have occurred without development. To evaluate the hydrologic effects of each WGFP EIS alternative, current conditions or levels of diversions are imposed upon the baseflows that occurred throughout the study period. The model study period from 1950 through 1996 is suitable for estimating hydrologic effects associated with the EIS alternatives because it includes a broad range of average, wet, and dry years, and sequences of years that include dry years followed by wet years. Use of baseflow data prior to 1986 does not yield statistics that are misleading and inaccurate, rather it reflects the wide range of hydrologic conditions that can occur regardless of the level of diversions.

Comment: The DEIS only focused on monthly flow averages rather than looking at daily flows.

Response: Daily data were developed from monthly model output by disaggregating monthly values using historical gage records. Two sets of daily data were developed. Daily data were developed for the entire study period for the USGS gages on the Colorado River below Granby Reservoir, below Windy Gap, at Hot Sulphur Springs, and near Kremmling, and the gage on Willow Creek below Willow Creek Reservoir. In addition to the daily data developed for the entire study period at the locations listed above, average, wet, and dry monthly flows were disaggregated to daily values to develop average, wet, and dry daily hydrographs. A combination of daily and monthly hydrologic data was used for evaluations of resources dependent on flows or reservoir storage contents and levels. Average monthly summaries of flows, diversions, reservoir outflow, end-of-month reservoir contents, surface elevations, and surface areas for average, wet, and dry conditions were used to support general characterizations of hydrologic changes associated with the alternatives. Daily data were used to generate flow duration curves and daily

hydrographs, and to determine the frequency and magnitude of daily flow changes. These types of hydrologic analyses were based on daily variations, and were used in resource assessments where the magnitude or value of the resources is especially sensitive to daily hydrologic changes and where the use of average, wet, and dry monthly values would mask the severity of the effects on those resources. Section 3.5.2.2 of the FEIS was revised to include information related to the use of daily data for resource evaluations, including fisheries and water quality that are sensitive to daily flow variations.

Comment: Hydrologic impacts are underestimated. Hydrologic impacts should be based on comparisons with historical conditions.

Response: Effects on flows due to future WGFP diversions were based on a comparison with modeled existing conditions and the No Action alternative that reflect the existing Windy Gap Project diversions and that are indicative of the current administration of the river, demands, infrastructure, and operations. Hydrologic output associated with the action alternatives was not compared with historical hydrology because current Reclamation, Corps, and CEQ guidance implementing the National Environmental Policy Act dictate that the effects of the proposed action be compared to either the existing condition or the No Action alternative, not historical conditions. To develop an analysis that is inconsistent with current agency guidance would be procedurally incorrect.

Comment: Hydrologic impacts should be evaluated farther downstream than the gage below the confluence of the Blue River and Colorado River.

Response: The active model area extends downstream of the Dotsero gage. However, the area considered for the analysis of hydrologic effects extends downstream to the USGS gage below Kremmling. The downstream extent of the study area was initially based on the location where average monthly flow changes would be less than 10 percent under direct effects. Resource evaluations were conducted to determine impacts at that location and assess the validity of the downstream study area extent. Results of the resource evaluations indicate direct effects due to the WGFP would be negligible to minor along the Colorado River below the Kremmling gage, and would continue to diminish downstream with tributary inflows. Therefore, extension of the study area further downstream is not warranted based on the results of the resource evaluations. However, impacts to boating and aquatic resources on the Colorado River were evaluated downstream of Kremmling.

Comment: It seems astonishing that the original Windy Gap Project was built with no firm yield. What assurance is there that the proposed project would have a firm yield.

Response: The original WGFP assumed that storage in Granby Reservoir would be available for Windy Gap water more frequently and that as Participant demand increased, additional storage would be developed. The proposed project assures that dedicated storage in a new reservoir would remain available for Windy Gap water and, therefore, a firm supply of water for Participant use can be drawn on.

Comment: The WGFP and prepositioning under the Preferred Alternative would reduce Granby Reservoir water levels substantially from existing conditions.

Response: To maintain higher water levels in Granby Reservoir under the Proposed Action, the Subdistrict would modify prepositioning operations as described in the FWMP (FEIS Appendix E). Under the originally proposed version of prepositioning Granby Reservoir storage content and water surface elevations would be lower than existing conditions, particularly during consecutive dry years due to the delivery of C-BT water to Chimney Hollow Reservoir. To

maintain greater storage in Granby Reservoir, the Subdistrict would reduce, and in some instances curtail, C-BT deliveries to Chimney Hollow Reservoir when water levels in Granby Reservoir are projected to fall below an elevation of 8,250 feet (about 340,000 AF of storage). If projections indicate Granby Reservoir would fill, C-BT water would be delivered to Chimney Hollow Reservoir to maintain that reservoir full to the extent possible. C-BT water in Chimney Hollow Reservoir would then be exchanged with Windy Gap water diverted to Granby Reservoir, as described under the originally proposed version of prepositioning. Details of this measure would be developed by the Subdistrict and incorporated into a proposed agreement between Reclamation and the Subdistrict with review by the Corps. The objective is to minimize the adverse effects of prepositioning on water levels in Granby Reservoir. This measure would minimize any potential negative effects on aquatic resources and recreation in Granby Reservoir that may be caused by reduced water levels from prepositioning.

Comment: The WGFP project will result in less water available for use on the West Slope.

Response: The WGFP would only divert water in accordance with their existing water rights, as administered by the Colorado State Engineer. The Subdistrict would bypass flows necessary to meet senior downstream rights. As part of the compensatory mitigation for the original Windy Gap Project, the Subdistrict agreed to subordinate its Windy Gap decrees to all present and future in-basin irrigation, and domestic and municipal uses (excluding industrial uses) on the Colorado and Fraser rivers and their tributaries above the Windy Gap Reservoir site.

Comment: The Northern Colorado Water Conservancy District has a contractual obligation to maintain a specific water flow below Windy Gap Reservoir along the entire river bed adjacent to downstream property holders.

Response: The Subdistrict will continue to honor all agreements with downstream property holders that are still in effect.

Comment: The WGFP water rights are conditional; this is a new water project requiring new water rights.

Response: The Windy Gap water rights were made absolute in Case No. 89CW298, which awarded absolute water rights to pump 600 cfs from the Windy Gap Pump Canal, and also confirmed the volumetric diversion limits as an integral part of the decree. WGFP water rights are under the administration of the Colorado State Engineer's Office.

3150 Ground Water

Comment: WGFP diversions could impact the water table along the Colorado River or below Granby Reservoir, resulting in impacts to aquifer recharge and domestic wells.

Response: The WGFP will only divert water in accordance with the existing water rights. Water level fluctuations associated with stream diversions would have negligible effects on alluvial ground water levels and well productivity. Changes in stream stage of typically less than 6 inches as a result of the WGFP are unlikely to be noticeable to a user pumping from the alluvium, assuming the average saturated thickness is adequate to produce water by pumping at any specific location. As the low topographic point in the basin, the Colorado River is mostly a gaining stream and alluvial water table fluctuations of greater than 6 inches are common due to natural seasonal climatic variations and runoff, ground water pumping, irrigation return flows, and stream diversions. Granby Reservoir spills would decrease with the WGFP, but minimum flow releases would continue. Other regional subsurface contributions from bedrock formations to the alluvial aquifer would be unaffected by the WGFP.

3160 Stream Morphology and Floodplains

Comment: WGFP Colorado River diversions will adversely impact channel morphology; larger flushing flows than the existing 450 cfs requirement are needed.

Response: Although the Colorado River flow has been quite variable, due in part to diversions and storage, only minor changes in river morphology have been detected below Granby Reservoir and below Windy Gap Reservoir (Ward and Eckhardt 1981; ERO and Boyle 2007). In addition, recent cross-sectional analyses completed for aquatic resources, 8 to 10 miles downstream of Windy Gap Reservoir, showed no evidence of recent changes to stream morphology or sediment deposition in the Colorado River near Parshall (Miller 2008). Sediment discharges to the Colorado River are derived from upstream sources, tributary inflows, overland flow, channel bed, and banks (Ward and Eckhardt 1981). The igneous and metamorphic rocks of the Colorado River headwaters are fairly resistant to weathering and, therefore, contribute little sediment to the river. A previous study showed that the Colorado River channel bed and banks are well armored (Ward and Eckhardt 1981). This study determined that the largest tributary source of sediment in the study area is Troublesome Creek; other tributaries are minor sources. The sediment supply was found to be low, and the transport capacity of the river greatly exceeded supply (Ward and Eckhardt 1981).

A sediment transport evaluation was completed for the Colorado River using streamflow and shear stress values at the Breeze station, a riffle site located downstream of the confluence of the Williams Fork. This analysis provides a generalized relationship between sediment mobilization and streamflows in the Colorado River. The results showed that fine sediments (sand, 2 mm or finer) would be mobilized at this riffle site at flows of less than 50 cfs. Fine gravel (8 mm) would require a flow of 200 cfs, medium gravel (16 mm) would require a flow of about 400 cfs, and coarse gravel (32 mm) would require a flow of about 850 cfs to be mobilized. The extensive data collection from Ward and Eckhardt 1981 study is still applicable. This study at four locations below Windy Gap to above the Blue River showed that fine sediments (sand, 2 mm or finer) would be mobilized at discharges ranging from 140 to 240 cfs (depending on location, with the highest flow at the lowest site above the Blue River). The flow duration curve for Hot Sulphur Springs shows minor changes in flows of 150 cfs or less and little change at Kremmling in flows of about 1,000 cfs or less. Additional discussion was added in Section 3.7.2.6 of the FEIS describing sediment transport. In addition, historic and recent aerial photos show minimal changes in stream morphology.

The Subdistrict developed a *Fish and Wildlife Mitigation Plan* (FWMP) in accordance with the requirements of CRS 37-60-122.2 (FEIS Appendix E). The FWMP includes an increase in channel maintenance flows. Flushing flows from the original Windy Gap Project (1980 MOU) would be modified to increase from 450 cfs to 600 cfs. In any year when flows below Windy Gap have not exceeded 600 cfs for at least 50 consecutive hours in the previous two years, and total Subdistrict water supplies in Chimney Hollow and Granby Reservoirs exceed 60,000 AF on April 1, the Subdistrict would cease all Windy Gap pumping for at least 50 consecutive hours to enhance peak flows below Windy Gap. The FWMP is a component of the mitigation and environmental commitments described in the FEIS (Section 3.25).

3200 Surface Water Quality

Comment: The Three Lakes model is focused on eutrophication and does not consider the problems associated with the discharge of pollutants from pumping from Granby Reservoir. The analysis focuses on annual average rather than the seasonal pumping issues.

Response: The process of eutrophication manifests itself in the growth of algae and associated problems such as decreased clarity. The Three Lakes Model accounts for pumping and the transfer of pollutants from Granby Reservoir in order to estimate the impacts on algae growth.

Model results are reported as annual averages and as daily results in the Lake and Reservoir Water Quality Technical Report.

Comment: The Three Lakes Water Quality Modeling Report temperature analysis is only performed for Granby Reservoir and ignores Grand Lake. Some of the model input is from Kremmling, which is 40 miles away.

Response: There is no discernable difference in temperature between the alternatives and existing conditions for Granby Reservoir. Therefore, it is anticipated that there would be no negative impact on Grand Lake or any of the other reservoirs due to the alternatives.
For the temperature analysis conducted for Granby Reservoir, air temperature, relative humidity, and precipitation data are from a meteorological station between Shadow Mountain Reservoir and Granby Reservoir. Wind speed is not recorded at that station, and information from the closest location (Kremmling) was used to estimate conditions at Grand Lake. Fortunately, air temperature, the most influential meteorological factor, is measured in the Three Lakes area.

Comment: The EIS does not address how WGFP Colorado River diversions will adversely impact Colorado River water quality from non-point sources, wastewater effluent, salinity, selenium, and sedimentation.

Response: Operation of the WGFP, as described in the FEIS, does not introduce nonpoint or other sources of pollution into the Colorado River. No construction activities or earthwork would occur on the West Slope as part of the Preferred Alternative. Construction of Jasper East Reservoir or Rockwell Reservoir have the potential to introduce sediment or other nonpoint sources to Colorado River tributaries during construction. WGFP diversions will reduce Colorado River flow below Windy Gap Reservoir primarily during the high runoff season in May and June. A reduction in Colorado River flows would reduce the volume of water available to dilute discharges from nonpoint sources such as agriculture, and point sources such as municipal wastewater discharge. Water quality modeling described in the WGFP FEIS and associated technical reports indicates that there would be no downstream exceedance of any water quality standards for chemical constituents as a result of the WGFP. However, increased WGFP pumping into the Three Lakes system would increase nutrient and sediment loadings to Granby Reservoir, Shadow Mountain Reservoir, and Grand Lake.

The Subdistrict would develop a proposed nutrient reduction mitigation plan for Reclamation and Corps approval, as described in Section 3.8.4 of the FEIS.. The plan includes point source nutrient reductions from WWTP discharges in the Fraser River and nonpoint source nutrient reductions from agricultural land in the Willow Creek watershed. Other nutrient reduction measures would be implemented as necessary to meet the requirement to provide a documented nutrient reduction credit factor of 1:1 to satisfy Reclamation and Corps mitigation requirements. These measures would improve the quality of the Fraser River, Willow Creek, and the Colorado River year-round and also would benefit the Three Lakes, Horsetooth Reservoir, and Carter Lake by reducing nutrient loading from WGFP pumping.

Comment: The EIS does not address the low flows below Windy Gap in August and September and the algae blooms.

Response: Historically, low flows in the late summer and fall have occurred outside of the Windy Gap pumping season. The WGFP would allow potential increases in August diversions primarily in wet years. The WGFP would not divert water in September. To mitigate potential temperature increases in the Colorado River from WGFP diversions in the late summer, mitigation measures will be implemented as described in the response to the next comment and in Section 3.8.4 of the FEIS. Filamentous algae and the diatom Didymo are common in the

Colorado River both upstream and downstream of the Windy Gap diversion and a nuisance primarily in the Fraser River and the Colorado River downstream of the confluence with the Fraser River. The growth and production of algae and diatoms depends on a variety of complex factors including hydrologic conditions, pollutant loading (nutrient sources such as WWT discharge, runoff from agricultural lands, and other nonpoint sources), and biotic factors. There is a lack of understanding regarding the factors that influence Didymo, and it is very difficult to predict how the WGFP might impact its growth, which some studies attribute to reduced high flows or higher nutrients. The WGFP does not contribute to nutrient concentrations in the Colorado River, but proposed mitigation to reduce nutrient loading to the Three Lakes will benefit water quality in the Colorado River, as described in Section 3.8.4 of the FEIS.

Comment: Additional WGFP diversions from the Colorado River will increase stream temperature, which are already too high particularly in the late summer.

Response: Additional stream temperature and climatic data became available following the initial analysis of temperature impacts for the DEIS. Subsequently, a dynamic temperature model (Hydros 2011) was developed with input and review by EPA to simulate weekly average temperatures and daily maximums for the Colorado River between Windy Gap Reservoir and the Williams Fork for existing conditions and the alternatives. The model simulations were conducted for the months of June through September using the very warm observed climatic data from 2007. Results of this analysis indicated that increased exceedance of the chronic maximum weekly average temperature (MWAT) and acute daily maximum (DM) standards would occur in July and August of some years. Specifically, temperature standard exceedances were simulated to increase from existing conditions in 4 out of the 15 years evaluated with additional WGFP diversions. For these years, the dynamic modeling indicated that the MWAT standard would be exceeded for several consecutive days or weeks and the DM would be exceeded up to several additional days, when simulated with the very warm 2007 meteorology.

In recognition of the state's responsibility for fish and wildlife resources found in and around state waters that are affected by water diversion, delivery, or storage facilities, the Colorado General Assembly enacted Colorado Revised Statute (CRS) 37-60-122.2. This statute states that "fish and wildlife resources that are affected by the construction, operation or maintenance of water diversion, delivery, or storage facilities should be mitigated to the extent, and in a manner, that is economically reasonable and maintains a balance between the development of the state's water resources and the protection of the state's fish and wildlife resources." The Subdistrict developed a *Fish and Wildlife Mitigation Plan* (FWMP) in accordance with the requirements of CRS 37-60-122.2 (FEIS Appendix E). The Colorado Wildlife Commission adopted the FWMP on June 9, 2011 and the Colorado Water Conservation Board (CWCB) adopted it on July 13, 2011. The FWMP is a component of the mitigation and environmental commitments described in the FEIS (Section 3.25). Temperature mitigation measures would reduce the potential for exceedance of the temperature standards and impacts to fish associated with operation of the WGFP. Other factors including low precipitation, diversions by others, and WWTP discharges also contribute to elevated stream temperatures, whether the WGFP is pumping or not.

Comment: Additional WGFP pumping into the Three Lakes will adversely impact water quality in Granby Reservoir, Shadow Mountain, and Grand Lake.

Response: The Water Quality section of the FEIS includes a discussion of the project impacts to water quality in each of the Three Lakes. Section 3.8.4 of the FEIS includes a discussion of the mitigation measures designed to reduce impacts to lake water quality by offsetting nutrient loading from additional WGFP pumping. These measures include upgrades to the Fraser WWTP, and implementation of best management practices and other erosion-control measures to reduce nonpoint agricultural sources of nutrient discharges in the Willow Creek drainage and elsewhere.

These measures would offset the total nitrogen and total phosphorus loadings to the Three Lakes projected from the WGFP compared to existing conditions, and would have the associated beneficial effects on lake clarity and reduced algae. These measures would not only benefit the Three Lakes and deliveries to the East Slope during pumping, but would provide a year-round benefit to water quality in the lower Fraser River, Willow Creek, and the Colorado River.

Comment: Are the applicable standards for Grand Lake water quality the Colorado Department of Public Health and Environment (CDPHE) standards or is the requirement to maintain Grand Lake as it was prior to the Colorado-Big Thompson Project per Senate Document 80?

Response: The CDPHE is responsible for establishing and enforcing water quality standards for all water bodies in the state. Additionally, Reclamation is responsible for operating the C-BT Project in accordance with the requirements of Senate Document 80.

Comment: The Lake and Reservoir Water Quality Technical Report indicates that only recent comprehensive water quality data (2000-2007) was available for use in the analysis. With these limitations, how can you evaluate changes in Grand Lake since the 1981 Windy Gap EIS?

Response: CEQ, Reclamation, and Corps guidance require agencies to use available information when preparing NEPA documents. Available water quality data for Grand Lake provides adequate information for quantifying existing water quality conditions and predicting future water quality. The WGFP EIS evaluates potential effects to water quality by comparing either existing conditions or expected conditions under the No Action alternative to what water quality is likely to be with implementation of any of the alternatives. The EIS does not directly evaluate specific changes in Grand Lake since 1981. Cumulative effects to water quality in Grand Lake from past, present, and reasonably foreseeable actions are evaluated as part of the cumulative effects evaluation in the FEIS.

Comment: Toxic algae blooms in Grand Lake are a concern. In the past they have caused public health officials to warn against any use of Grand Lake for recreational purposes.

Response: In 2007, a water advisory was posted for Grand Lake for 2 weeks by the Grand County Public Health Nursing Service. This was based on a microcystin measurement of 1.48 ug/l on August 6, 2007 analyzed using the ELISA method. Two follow-up tests using another method (HPLC) on the August 6 samples indicated values of 0.85 and 0.87 ug/l. The WHO alert level for chronic exposure via drinking water is 1 ug/l. The highest mycrocystin test value for 2004, 2005, 2006, 2008, and 2009 was 0.334 ug/l. Most of the results are below the detection limit. Mycrocystin levels continue to be monitored. The relationships between the abundance of toxin-producing algae and levels of microcystin are unclear and are the subject of research efforts.

Comment: Table 17 of the Lake and Reservoir Water Quality Technical Report indicates that for In-Lake values for 22 of the 37 parameters, there is either no data, not enough data, or data varies. The lack of data casts doubts on the findings.

Response: CEQ, Reclamation, and Corps guidance require agencies to use available information when preparing NEPA documents. Available water quality data were used to develop Table 17 which lists sixteen water quality parameters. Some are duplicated because there may be different requirements depending on the use classification. For example, the standard for dissolved cadmium for aquatic life is different from the dissolved cadmium standard for water supply. When the word ‘varies’ is listed in the “In-Lake Value” column, this means that the standard varies (usually as a function of hardness or temperature and pH), thus making it difficult to summarize the threshold from which to compare. For these instances, the standards assessments

were completed and the final conclusion is in the "Standard Met?" column. When "not enough data" is noted, that means data existed but the minimum number of data points required for a standards assessment was not met. The FEIS includes updated information on Colorado Department of Public Health and Environment 2011 water quality standards for the Colorado River and South Platte River basins.

Comment: The Lake and Reservoir Water Quality Technical Report indicates that low dissolved oxygen concentrations at the bottom are a concern because of the potential for release of orthophosphate, ammonia, iron, and manganese from the sediment under anoxic conditions. Why wasn't this information included in the EIS?

Response: This information has been added to the FEIS.

Comment: What was the level of clarity in Grand Lake in 1981 before Windy Gap, or 1947 prior to the C-BT Project?

Response: Available data indicate that clarity in Grand Lake is approximately the same as it was in the 1950's and 1960's, shortly after the initial delivery of C-BT Project water through Grand Lake. The WGFP EIS evaluates the potential effects to water quality from a change in the current baseline conditions to what water quality is likely to be with implementation of any of the alternatives. Although the EIS does not directly evaluate specific changes in Grand Lake since 1981 or evaluate the impacts due to the C-BT Project, available historical Secchi-disk depth readings are summarized below. Only years with multiple readings over the course of the year are included since there are seasonal effects. The values are in meters. Note that there is only one year (1953) after the C-BT Project came online and before construction of the Windy Gap Reservoir. There are no data points for 1981. There is only one data point (9.2 meters) for the period before the C-BT Project (September 6, 1941).

Year	Mean	Period	N	Min	Max	Data Source
1953	3.1	May-Oct	8	1.2	4.6	Pennak
1953	2.7	June-Oct	15	1.3	4.7	Colorado Public Health Department
1953	2.5	Jun-Sep	20	1.3	3.7	Reclamation
1975	3.4	Aug-Oct	4	2.4	4.3	Colorado Department of Health
1980/81	Unk.	Unk	Unk.	1.9	3.7	CSU, Patrick Nelson, M.S. Program
1996	2.8	Jun-Sep	12	1.6	4.6	Grand Lake Volunteers
1997	3.2	Jun-Sep	7	2.1	4.1	Grand Lake Volunteers
1998	2.7	Jun-Sep	5	1.7	3.5	Grand Lake Volunteers
1999	3.7	Jun-Aug	4	3.0	4.5	Grand Lake Volunteers
2000	3.2	Jun-Nov	6	2.3	5.7	Grand Lake Volunteers / USGS
2001	3.4	May-Nov	12	2.4	4.9	USGS
2002	3.6	May-Nov	9	2.1	5.3	USGS
2003	3.0	May-Nov	6	2.0	4.0	USGS
2004	3.8	May-Oct	5	2.9	5.4	USGS / USBR
2005	3.4	May-Oct	9	1.8	5.5	USGS / USBR

Comment: Consider the impacts of the C-BT Project on Grand Lake water quality.

Response: The impacts of the C-BT Project are beyond the scope of the WGFP EIS. Reclamation, the Northern Water Conservation District, and Grand County are currently evaluating changes in C-BT operation to improve Grand Lake water quality.

Comment: Hot Sulphur Springs and Kremmling were not properly analyzed in the EIS. Both of these towns are already having problems with water treatment and the WGFP would increase their problems.

Response: The Subdistrict would comply with state water law for all diversions. The Windy Gap Project currently curtails Colorado River diversions when flows reach 90 cfs below Windy Gap Reservoir. The Hot Sulphur Springs wastewater treatment plant (WWTP) effluent limits are based on upstream low flow conditions lower than 90 cfs. The Subdistrict would continue to curtail Colorado River diversions under the WGFP per the existing minimum flow requirements and, therefore, there would be no impact to Hot Sulphur Springs' water diversions or WWTP NPDES permit conditions. Kremmling's water intake and discharge are in the Muddy Creek drainage, and the WGFP would have no impact on Muddy Creek. To mitigate WGFP nutrient loadings to the Three Lakes, mitigation measures would be implemented that will offset the estimated additional nutrient loading to the Three Lakes system from the WGFP. These measures would provide year-round improvements to Colorado River water quality, which would benefit Hot Sulphur Springs. Proposed nutrient mitigation measures are described in Section 3.8.4 of the FEIS.

Comment: A reduction in Fraser River flows will hinder the ability to discharge treated wastewater. What will be the additional cost to the homeowners in Fraser for wastewater treatment.

Response: The WGFP will have no effect on Fraser River flows. Proposed nutrient mitigation measures for the Three Lakes will improve stream water quality in the lower Fraser River year-round.

3300 Aquatic Resources

Comment: The DEIS did not provide an analysis of the potential significant impacts on macroinvertebrates from seasonal reductions in Colorado River streamflow, and changes in water chemistry, algae, and temperature. Low flows and higher temperatures will exaggerate algae problems, destroying the ability to fish from July to September. Any increase in algae growth would likely shut down fishing completely and has the potential to completely destroy insect activity in the river. What are the specific forecasted impacts to key hatches like the Giant Orange Stonefly in the upper Colorado?

Response: Multiple approaches were used in determining impacts to aquatic resources including macroinvertebrates. Information was used from hydrologic modeling of flow changes, water quality modeling, aquatic habitat modeling, and sediment transport analysis. Water quality was modeled as a function of existing and predicted future conditions, including a cumulative effects analysis. Results indicate dissolved oxygen would have a slight decrease (approximately 0.1 mg/l), and concentrations would remain above the current water quality standard and are not expected to impact macroinvertebrates, including large stoneflies like *Pteronarcys*.

Filamentous algae and the diatom Didymo are common in the Colorado River. Algae provide forage for benthic invertebrates and will capture inorganic nutrients. The growth and production of algae depends on a variety of complex factors including hydrologic conditions, water quality (nutrient sources such as WWTP discharge, runoff from agricultural lands, and other nonpoint sources), and biotic factors. Didymo naturally occurs in northern or mountainous regions of Europe, Asia, and North America, but even within its native range, there have been reports of excessive growth in areas where previously it existed only at low concentrations. Unfortunately, there is a lack of basic biological and ecological knowledge for this organism. It thrives under a wide range of freshwater conditions – both hydrological and chemical, although it is commonly reported that Didymo prefers streams with low phosphorus and low mean discharge. Studies

have found no relation between water velocity and visual biovolume indices. A recent study reported a decrease in abundance in Boulder Creek, Colorado after a 3-day rain event, which suggested that larger flows could reduce its growth. However, the level of abundance was restored within a week and, therefore, the impact was not long lasting. Given the lack of understanding regarding the factors that influence Didymo, it is very difficult to predict how the WGFP might impact its growth. Mitigation measures designed to reduce nutrient loading to the Three Lakes will also reduce nutrient concentrations in the Fraser and Colorado rivers. No substantial changes in algae or Didymo populations are expected as a result of the WGFP or benthic invertebrate populations.

Water temperature modeling, including additional analysis since the release of the DEIS, indicate that the chronic maximum weekly average temperature (MWAT) standard could be exceeded during periods of WGFP pumping in mid to late summer. Mitigation for temperature impacts is included in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict. See Section 3.8.4.2 of the FEIS for further discussion of temperature mitigation. Temperature mitigation measures would reduce the potential for exceedance of the temperature standards and impacts to fish associated with operation of the WGFP..

A sediment transport analysis provided a generalized relationship between sediment mobilization and streamflows in the Colorado River, and indicated that flushing flows would remain more than adequate to move fine to medium-sized gravels and maintain habitat for spawning fish and creation of macroinvertebrate habitat. The FEIS (Section 3.5.4) includes mitigation measures to increase flushing flows. Flushing flows from the original Windy Gap Project (1980 MOU) would be modified to increase from 450 cfs to 600 cfs. In any year when flows below Windy Gap have not exceeded 600 cfs for at least 50 consecutive hours in the previous two years, and total Subdistrict water supplies in Chimney Hollow and Granby Reservoirs exceed 60,000 AF on April 1, the Subdistrict would cease all Windy Gap pumping for at least 50 consecutive hours to enhance peak flows below Windy Gap.

Changes to aquatic habitat were modeled throughout most of the range of expected flows. The FEIS includes additional discussion of impacts to aquatic habitat in Section 3.9.3. The combined results of the water quality modeling, hydrology analysis, and sediment transport analysis all indicate that the ecological function of the river would be maintained at most times. The minimum streamflow requirements maintain the habitat needed for primary and secondary productivity. No impacts to those trophic levels are expected. Mitigation for water quality impacts will minimize and reduce potential impacts to aquatic habitat.

Comment: The DEIS does not identify the impact of diversions on aquatic life during drought conditions.

Response: Aquatic habitat modeling evaluated the impact to habitat under average, wet, and dry year conditions. There would be no impact to aquatic habitat in dry or drought years because there would be no change in Windy Gap diversions in dry years as a result of the WGFP. Cumulative impacts to aquatic habitat in dry years are discussed in the EIS, with additional analysis included in Section 3.9.3 of the FEIS.

Comment: The DEIS downplays consideration of cumulative effects to suggest there will be little effect on fishing or fisheries, despite information showing more frequent periods of lower flow and violation of the water quality standard.

Response: The DEIS and FEIS include an evaluation of the cumulative effects to aquatic life based on past, present, and reasonably foreseeable future actions. Mitigation measures are included in the FEIS to reduce the potential for aquatic resource impacts including stream temperatures that exceed state standards, as described in Section 3.8.4 of the FEIS.

Comment: What about the potential for the WGFP spreading zebra and Quagga mussels in West and East Slope reservoirs?

Response: In 2008, quagga and zebra mussel veligers were detected in the Three Lakes. Movement of C-BT Project water through the Adams Tunnel would have already moved quagga and zebra mussels to eastern slope reservoirs. However, a number of researchers (Hinks and Mackie 1997; Cohen and Weinstein 2001; Jones and Ricciardi 2005; Whittier et al. 2008) have noted that calcium is a key limiting factor, and there is uncertainty as to whether the Three Lakes will sustain reproducing adults due to very low calcium concentrations. It may be possible for veligers to survive being transported from the Three Lakes system through the Adams Tunnel and the C-BT delivery system to Horsetooth Reservoir. If this were the case, it may be very difficult for mussel populations to establish in Horsetooth Reservoir, again due to very low calcium concentrations (~9 mg/l). In addition, veliger mortality is likely high between the Three Lakes system and the Horsetooth Reservoir. These conditions exist with and without the WGFP, and it is very unlikely that the WGFP will alter the risk of infestation. A discussion of zebra and quagga mussels has been added to Section 3.8.3 of the FEIS.

Comment: Windy Gap Reservoir's contribution to whirling disease among rainbow trout should be considered in the mitigation of the WGFP. The consequence of reduced flows, lower flushing flows for sediment removal, and warmer temperatures on whirling disease should be considered.

Response: Whirling disease is widespread across Colorado and has resulted in the loss or reduction of rainbow trout populations in many of the state's rivers. Whirling disease is still present in the Colorado River, but there appears to be a shift in the species of tubiflex worms present in the reservoir according to the Colorado Division of Wildlife (Jon Ewert). The current species are not the carriers of whirling disease in the same number as previously sampled in Windy Gap Reservoir. CDPW also is researching habitat modification as a means to curtail whirling disease. Thompson (2005, Whirling Disease/Habitat Interactions, Federal Aid Project F-427-R2, Federal Aid in Fish and Wildlife Restoration Job Progress Report, Colorado Division of Wildlife, Fish Research Section, Fort Collins, Colorado, May 2005) reports the percentage of myxospore in brown trout for several rivers in Colorado. Thompson reported that the percentage of prevalence of myxospores in brown trout in the Fryingpan River and Spring Creek in the Taylor River drainage were as high or higher than downstream from Windy Gap Reservoir. The objective of the study was to determine the response of whirling disease presence to habitat modification. Thompson could not conclude that habitat modification resulted in a marked reduction in the prevalence of whirling disease myxospores. Streamflow volumes would remain adequate for sediment transport; therefore, no sediment deposition or aggradation is predicted for the Colorado River. Whirling disease flourishes at a wide range of temperatures from 40°F to 68°F, which is the current temperature range in the Colorado River in nonwinter months. This temperature range would not change substantially with the WGFP, and any temperature changes as a result of the WGFP would not contribute to expansion of whirling disease. Overall, the WGFP would not increase the incidence or conditions that promote whirling disease.

3400 Vegetation

Comment: Reducing flows in the Colorado River will allow invasive species like tamarisk to overwhelm the river.

Response: The potential for expansion of invasive species was discussed in the DEIS. Although tamarisk (on the Colorado Noxious Weed List B) was not discussed specifically, the potential for noxious weeds, in general, to invade the proposed reservoirs and other impacted areas is possible. Tamarisk establishes in a wide variety of environmental conditions and often outcompetes native species. Tamarisk is uncommon in the Upper Colorado River basin according to the Colorado

Department of Agriculture Noxious Weed Management Program, and is more common in the lower Colorado River basin. The WGFP would have minimal impacts on streamflow in the lower Colorado River where tamarisk is more prevalent. To help prevent the spread of tamarisk and other noxious weeds from the WGFP, a noxious weed control plan would be developed and implemented, as described in Section 3.10.4 of the FEIS.

3500 Wildlife

Comment: Chimney Hollow Reservoir will have too much impact on existing animal and raptor populations.

Response: Chimney Hollow Reservoir will result in the loss of about 810 acres of elk and mule deer winter range and general habitat for other terrestrial species. The loss of winter range represents about 0.2 percent of the available winter range in the CDPW Game Management Unit. Chimney Hollow Reservoir construction will inundate raptor and other bird habitat. The loss of habitat would displace species that have historically nested or foraged in the Chimney Hollow area. There would be no effect to golden eagles that occasionally nest on the cliffs to the east of Chimney Hollow Reservoir. The new reservoir would provide foraging habitat for bald eagles and other waterfowl. Proposed mitigation may include habitat improvement and management measures to enhance wildlife at Chimney Hollow. In accordance with the requirements of CRS § 37-60-122.2, the Subdistrict prepared a FWMP (FEIS Appendix E) in cooperation with the CDPW to develop specific mitigation measures for the identified impacts of the Proposed Action. The FWMP addresses wildlife habitat mitigation at the Chimney Hollow Reservoir site. The Subdistrict would develop a plan to replace the values provided by habitat lost or altered by construction of Chimney Hollow Reservoir. Mitigation of impacts to wildlife resources would involve a combination of mitigation strategies and tools including restoration of temporary disturbances, habitat enhancement, use of seasonal restrictions and buffer zones for raptors, and a migratory bird avoidance plan. In addition, the Subdistrict, Larimer County Parks and Open Land, and the CDPW will work cooperatively to develop a wildlife management plan for Chimney Hollow.

3550 Threatened and Endangered Species

Comment: Why will there be no impact on Colorado River endangered fish species?

Response: Section 3.13.2.3 of the FEIS was revised to explain the adverse effects to Colorado River endangered fish from WGFP depletions to the Colorado River, and the Municipal Subdistrict's participation in the Recovery Agreement and payment of the depletion fee. The USFWS Biological Opinion for the WGFP issued February 12, 2010 concluded that the project meets the criteria of the Recovery Implementation Program Recovery Action Plan to offset depletion impacts, and the project is not likely to jeopardize the continued existence of Colorado River endangered fish and is not likely to destroy or adversely modify designated critical habitat.

3600 Land Use and Land Ownership

Comment: The WGFP will impact property values at Ouray Ranch located below Granby Reservoir.

Response: Granby Reservoir spills increased when the Windy Gap Project was constructed because additional water was stored in Granby Reservoir and the potential for spills increased in wet years. Under the WGFP, Windy Gap water would be stored in new reservoir(s) and thus the potential for spills to the Colorado River in wet years would decrease. Granby Reservoir minimum flow releases would not change and as described in the FEIS. The potential for impacting property values from a decrease in Granby Reservoir spills in wet years would be minimal.

Comment: What about the impact to irrigation diversions at Ouray Ranch below Granby Reservoir?

Response: Granby Reservoir is owned by Reclamation and operated by the Northern Colorado Water Conservation District as a component of the C-BT Project. The WGFP has no direct control on releases from Granby Reservoir. Windy Gap water pumped from Windy Gap Reservoir to Granby Reservoir would spill less frequently in wet years under the WGFP. Granby Reservoir minimum flow releases would not change and operations would continue in accordance with state water law. WGFP operations would not impact irrigation diversions below Granby Reservoir. All WGFP diversions occur at Windy Gap Reservoir and are subject to any senior water rights that have a higher priority.

Comment: What about the impact to downstream ranchers and farmers that are already having trouble getting water out of the Colorado River because of low flows? How will their water rights be protected? Irrigators in the Kremmling area believe that Reclamation and the NCWCD should be responsible for maintenance and construction of pump sites on an ongoing basis. The pumps installed in the 1980s are failing to be effective with less water in the Colorado River and channel deepening. Irrigators feel the need for just compensation or irrigation structures that can pump their decreed rights in an effective and efficient manner as to protect the custom and culture they have enjoyed for generations.

Response: The Subdistrict would comply with state water law for all diversions. Windy Gap cannot divert when downstream senior water rights are calling for water. In addition, the WGFP would comply with Colorado River bypass flow requirements established by the Agreement Concerning the Windy Gap Project and the Azure Reservoir and Power Project (Azure Agreement) completed April 30, 1980 as part of the original Windy Gap Project. This agreement requires the Windy Gap Project to curtail diversions if streamflow drops below 90 cfs below Windy Gap Reservoir; 135 cfs below the Williams Fork; or 150 cfs below Troublesome Creek. The Windy Gap Project cannot divert if the agreed minimum flows are not met, even if Windy Gap water rights are in priority. Colorado River flows may fall below the minimum streamflow volumes when the WGFP is not pumping, particularly in late summer. The Subdistrict has no control over Colorado River flow when the Windy Gap Project is not pumping.

The EIS points out that water rights for existing agriculture, municipal, and other uses would be protected under Colorado water law, and any municipal or agricultural diversions downstream from Windy Gap Reservoir, per Colorado water law (C.R.S. § 37-92-102(2)(b)), would remain responsible for developing a reasonable means of diversion for their water. Per the Azure Agreement, the Subdistrict funded $500,000 in improvements for ranches downstream from Windy Gap Reservoir to maintain their diversion structures on the Colorado River. The original Windy Gap Project included diversions greater than those in the WGFP. The 1980 Azure Agreement was developed to mitigate and address all objections to the Windy Gap Project. The Azure Agreement was signed by 30 ranchers. The C-BT Project will continue to be operated in accordance with Stipulation j. of Senate Document 80 and downstream irrigators in the Kremmling area will continue to be treated as if their water supply from the Colorado River has a date of priority earlier than the rights of the C-BT Project. Sufficient water will be provided from Granby Reservoir to meet these rights. However, as stated above, it is the responsibility of the irrigator to assure that their irrigation diversion works are capable of capturing their water rights.

Comment: Traffic studies should be conducted and Highway 56 should be widened.

Response: If Chimney Hollow Reservoir is constructed, the Subdistrict and construction contractors would comply with applicable Larimer County Road and Bridge Department regulations, and work with the county to minimize impacts to roads and maintain traffic safety.

Comment: How will the proposed project impact growth and development along the Front Range?

Response: As discussed in Section 2.8.3, Actions Not Considered Reasonably Foreseeable, growth-related impacts were not evaluated in the FEIS because population growth in the communities served by the WGFP is expected to occur regardless of the decision on whether to implement the project.

3700 Recreation

Comment: Water based recreation impacts are based on changes in streamflow from 1950-1996, but does not consider 1997-2007 streamflow, when streamflow was reduced by man made factors, including the Windy Gap Project and drought. If more recent information was used, the incidence of inadequate streamflow for boating would surely increase.

Response: The model period used in the DEIS provides a broad range of average, wet, and dry flow conditions for evaluating hydrologic impacts and water-based recreation impacts. The 1997 to 2003 period, which included the 2002 drought year, was evaluated to determine whether inclusion of an extreme drought year would affect conclusions regarding associated hydrologic changes. Results of that assessment indicated that in drought years like 2002, the WGFP would not divert water because the water rights would not be in priority, and the 1950–1996 model period contains sequences of years similar to those that occurred from 1997 to 2003. Extension of the modeling period would not substantially change the range of hydrologic conditions or the predicted impacts to flows available for boating as a result of the WGFP.

Comment: The recreation impacts to rafters and kayakers is incorrectly based on the assumption that the optimal flows in the Colorado River are between 1,000 and 2,200 cfs. There is no high end number for optimal flows and it is rare for the Colorado River below Kremmling to ever get too high.

Response: The development of "preferred flow" and "minimum preferred flow" standards for boating on the Colorado River was based on previous studies, published guidebooks, and personal communications with raft guides and BLM staff. The original use of 2,200 cfs as a high-end indicator (not a cap) for preferred boating flows was consistent with guidebook rating of Class V+ rapids through Big Gore Canyon when flows exceeded that level, and the assumption that few boaters would safely float the canyon at those levels. Incidentally, the Grand County Stream Management Plan (SMP) identifies "optimum" kayaking flows to be below 1,400 cfs. None of the alternatives affect the average frequency of high-end streamflows above 2,000 cfs. After review of the Grand County SMP and additional conversations with BLM staff, the preferred flow ranges for boating were changed and simplified to use a preferred flow of 850 to 1,250 cfs in Gore Canyon and 1,100 to 2,200 cfs at Pumphouse. The Recreation section of the FEIS reflects these changes. Rafting and kayaking likely occurs both below and above these flow ranges, but it does reflect the range of preferred flows when most boating activities occur. Nothing in any alternative would preclude advanced boaters from accessing the river during high-end streamflow periods.

Comment: The EIS needs to evaluate impacts on recreation when boat ramps at Granby Reservoir would not be accessible due to lower water levels.

Response: Access to the Arapaho Bay boat ramp would be affected in May of average years under the Proposed Alternative, as discussed in the DEIS. The Arapaho Bay ramp would be accessible, along with the other boat ramps, through the duration of the summer recreation season. It is reasonable to assume that the loss of one boat ramp early in the 5-month boating season would not substantially affect recreation use or experiences. To address the impacts

associated with lower water levels in Granby Reservoir, prepositioning under the Proposed Alternative was modified in the FEIS to maintain higher water levels in Granby Reservoir, particularly during dry years. As discussed in Section 3.19.4 of the FEIS, modified prepositioning would maintain higher water levels when Granby Reservoir is forecasted to fall below an elevation of 8,250 feet. However, drought conditions and delivery of C-BT water could still result in water levels below the 8,250 elevation of the Arapaho Bay boat ramp in some years. The Recreation section in the FEIS has been revised to acknowledge potential impacts on private marinas and boat docks at Granby Reservoir when water levels are lower.

Comment: A decrease in water clarity in the Three Lakes system will adversely impact the aesthetic qualities, visitor experience, and local economy.

Response: Proposed nutrient mitigation measures, are estimated to offset the additional nutrients that the WGFP would deliver to the Three Lakes. Reducing nutrient loading into the Three Lakes system would reduce the potential for increased algal growth or changes in clarity as a result of the WGFP. Thus, with nutrient mitigation measures, the WGFP is unlikely to adversely impact the existing aesthetics, recreation, or other socioeconomic effects related to lake clarity.

Comment: The EIS should evaluate the impact to the Colorado River's potential suitability for designation as a wild and scenic river.

Response: Evaluation and potential designation of portions of the Colorado River as Wild and Scenic is a separate process being conducted by the Bureau of Land Management (BLM). BLM will complete the suitability evaluation as part of its RMP revision process with recommendations given in a Draft EIS that was released on September 16, 2011. BLM's policy is to manage and protect eligible river segments so as not to adversely constrain the suitability assessment or any subsequent recommendations to Congress. River or stream segments must be found eligible and suitable to be considered for designation in the National Wild and Scenic Rivers System and only Congress or the Secretary of the Interior can designate segments. Recreational values are among the outstanding remarkable values identified for each river segment. The EIS discusses and acknowledges this ongoing process in the Recreation section. While the effects to river recreation described in the EIS could relate to the recreational values along the Colorado River, it is BLM's responsibility to determine the suitability of each reach being considered for Wild and Scenic designation.

Comment: The recreation analysis excludes baseline information for any visitors, but commercial boating and commercial fishing on only one reach of the Colorado River, excluding all other recreation activities in all other locations.

Response: All existing available information on water-based visitor use was used. No visitor data for private boating and fishing on the Colorado River is available. No statistical information is kept on visitor use at the Three Lakes.

Comment: How much would flows in the Big Thompson River increase and how would it affect the number of kayak days?

Response: Under the Preferred Alternative, Big Thompson River flows below Lake Estes would increase primarily from May to July by about 14 to 18 cfs on average. Suitable kayaking flows occur at more than 400 cfs, which typically occurs mostly in June under existing conditions. The small increase in summer flows could slightly increase the number of days when flows exceed 400 cfs.

Comment: What would be the effect to boating flows in North St. Vrain Creek below Ralph Price Reservoir and in St. Vrain Creek through Lyons?

Response: The flows in North St. Vrain Creek and St. Vrain Creek above Lyons would only be affected under the No Action Alternative. Predicted changes in flow for these streams are included in Table 3-15 of the FEIS. Potential impacts to boating are discussed in Section 3.19.2.7 of the FEIS.

Comment: Higher water levels in the Big Thompson River will adversely affect trout fishing.

Response: The small increases in summer flows (<18cfs on average) would slightly increase fish habitat, but is unlikely to measurably affect fish populations or accessibility for fishing.

3770 Visual Resources

Comment: The visual quality analysis excludes consideration of Three Lakes Reservoirs, Willow Creek Reservoir, and the Colorado River as scenic assets that attract and extend the stay of visitors.

Response: The EIS includes a discussion of visual effects for the Three Lakes and Colorado River in Section 3.21.2.5. Proposed mitigation measures (FEIS Section3.25) for the Preferred Alternative includes modifying prepositioning to maintain higher water levels in Granby Reservoir and nutrient reduction measures to minimize impacts to algae growth and clarity in the Three Lakes. Willow Creek Reservoir would not be impacted by the WGFP.

3800 Socioeconomics

Comment: Lower Granby water levels may impact lakeside lodges and marinas.

Response: No information was available to quantify potential economic effects associated with varying Granby Reservoir water levels. The Preferred Alternative was revised in the FEIS to include a modification to prepositioning that would reduce the magnitude of drawdowns in Granby Reservoir as a result of the WGFP. Hydrologic modeling indicates that prepositioning of C-BT water in Chimney Hollow would be curtailed when Granby Reservoir storage reaches about 340,000 AF (8,250 feet in elevation). Drought conditions and delivery of C-BT water could still result in water levels below 8,250 feet in elevation in some years. Proposed modification to prepositioning would reduce the potential for water level fluctuations from the WGFP that could affect lakeside businesses. Additional discussion of the effects of modified prepositioning are in Section 3.5.4 of the FEIS.

Comment: The economic impacts to the Western Slope were not fully analyzed in the DEIS. The DEIS excludes economic impacts of recreational activities and tourists on lodging, restaurant sales, recreation equipment rental providers, guides, outfitters, marinas, rafting businesses, and other retailers. Those measured impacts are underestimated because of an inaccurate measure of existing conditions, No Action, inappropriate modeling techniques, false assumptions, outdated data, lack of quantification, and omission of critical data.

Response: Socioeconomic and other effects were quantified where data on use and impacts are available. Effects of the Preferred Alternative on the recreation experience and aesthetics is qualitatively described wherever possible, recognizing that these effects vary widely by individual user. As described in the Aquatic Resources section, projected effects to fish habitat are not anticipated to translate to a loss in fishing opportunities or fishing success. Reductions in preferred boating flows and boating days, and the associated economic effects are described and quantified in the Recreation and Socioeconomics sections. The analysis focuses primarily on commercial boating, for which baseline use data exist. Proposed mitigation measures, as

summarized in Section 3.25 of the FEIS, such as nutrient reduction, modified prepositioning, and measures in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict and adopted by the CDPW and Colorado Water Conservation Board, would all contribute to reducing potential socioeconomic effects.

The best available information was used in analyzing socioeconomic effects. With respect to comments regarding existing conditions and hydrologic modeling, please refer to the response to comments in section 3100 on Surface Hydrology and Water Rights above. For issues regarding the No Action Alternative, please refer to section 2000 on Alternatives above.

Comment: The DEIS disregards impacts on property values from diminished aesthetic and recreational assets in Grand County including the Three Lakes and Colorado River.

Response: Property values around Granby Reservoir are not likely to be adversely impacted by changes in water levels, clarity, or water quality under any of the alternatives because the incremental change in these parameters is small relative to the current wide fluctuations. However, proposed modifications in prepositioning that maintains higher Granby Reservoir water levels, and nutrient mitigation that reduces the potential for lower clarity in the Three Lakes system would reduce the potential for any measurable impacts to real estate values near the Three Lakes as a result of decreased clarity resulting from the WGFP.

Potential socioeconomic impacts to boating from changes in flow were quantified, but most boating occurs adjacent to public lands and there would be no impact to private property. As described in the Aquatic Resources section, projected effects to fish habitat are not anticipated to translate to a loss in fishing opportunities or fishing success and, therefore, impacts to property values are unlikely.

Comment: The DEIS failed to consider the broad-based socioeconomic effects of reduced recreation and the ripple effects through the regional economy. The DEIS excludes consideration of many key aspects of the recreation economy by limiting consideration to active recreation where there is public access.

Response: The focus of the socioeconomics analysis is on the water-based recreation activities of fishing and boating because those activities are where the majority of effects are likely to occur. The indirect or ripple effects on the regional economy are included in that analysis. See also response to other socioeconomic comments in this section.

3900 Comments on Other Resources or Issues

Comment: The EIS should consider the Grand County Stream Management Plan.

Response: The Grand County Stream Management Plan (SMP) was reviewed during preparation of the EIS. Reclamation's understanding is that the objective of the SMP was to develop recommendations of preferred streamflow regimes to support stream health for aquatic habitat and other nonconsumptive water uses, as well as the flow regimes necessary to support water use requirements for irrigators, municipalities, industry, and recreation. The focus of the EIS was to evaluate and disclose the anticipated environmental effects of the alternatives. Where adverse effects were identified, mitigation measures were identified to offset or minimize those impacts. The mitigation measures developed for the WGFP are linked to identified project impacts and may not necessarily meet the target recommendations included in the SMP. However, mitigation measures included in the FEIS, such as reductions in nutrient loadings to the Colorado River and Three Lakes and development of a *Fish and Wildlife Mitigation Plan* would help meet some of the goals of the SMP. Additional discussion of the Grand County SMP was added to Section 3.9.1.4 of the FEIS.

4000 Mitigation

Comment: Mitigation measures in the DEIS are not detailed enough to address all of the impacts.

Response: Additional mitigation measures were defined and developed to reduce or offset the potential impacts from implementation of the Preferred Alternative. Mitigation measures and the effectiveness of those measures are described for each resource in Chapter 3—Environmental Consequences. An updated summary of mitigation measures also is included in Section 3.25 of the FEIS.

Comment: Mitigation measures should be commitments not suggestions.

Response: All of the final mitigation measures included in the FEIS and the Record of Decision will be environmental commitments by the Subdistrict and subject to review and monitoring by Reclamation.

Comment: What mitigation is proposed for the loss of winter range for big game at Chimney Hollow Reservoir?

Response: Mitigation for the loss of big game winter range at Chimney Hollow Reservoir is addressed in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict in cooperation with the CDPW in accordance with the requirements of CRS 37-60-122.2. A variety of vegetation/habitat enhancement and management activities are being considered to address the impact to habitat for big game and other species around Chimney Hollow Reservoir. The Subdistrict, Larimer County Parks and Open Land, and the CDPW will work together on management measures related to seasonal habitat closures, hunting, and other management tools.

Comment: What is the mitigation for loss of fish?

Response: As mentioned in the response to the previous comment, the Subdistrict developed a *Fish and Wildlife Mitigation Plan* (FEIS Appendix E) to address impacts to aquatic resources. The Colorado Wildlife Commission adopted the *Fish and Wildlife Mitigation Plan* on June 9, 2011 and the Colorado Water Conservation Board (CWCB) adopted it on July 13, 2011. The FWMP is a component of the mitigation and environmental commitments described in the FEIS (Section 3.25). Reclamation has accepted this plan as the mitigation plan for fish resources that are affected by implementation of the WGFP.

Comment: Mitigation should include increasing Colorado River minimum streamflow.

Response: Existing minimum streamflow requirements would not change. The *Fish and Wildlife Mitigation Plan* developed by the Subdistrict in accordance with the requirements of CRS 37-60-122.2 addresses mitigation for effects to aquatic resources affected by the WGFP. Proposed nutrient reduction measures would improve the quality of streamflow in the Colorado River. In addition, the *Fish and Wildlife Mitigation Plan* and FEIS include mitigation measures to increase Colorado River flushing flows. Flushing flows from the original Windy Gap Project (1980 MOU) would be modified to increase from 450 cfs to 600 cfs. In any year when flows below Windy Gap have not exceeded 600 cfs for at least 50 consecutive hours in the previous two years, and total Subdistrict water supplies in Chimney Hollow and Granby Reservoirs exceed 60,000 AF on April 1, the Subdistrict would cease all Windy Gap pumping for at least 50 consecutive hours to enhance peak flows below Windy Gap.

Comment: Set up scheduled recreational releases of water to mitigate impacts to the Colorado River boating beyond those for the Gore Race in August. This could include releases anytime streamflow in the Colorado River drops below 1,000 cfs or weekend releases.

Response: Overall, impacts to boating on the Colorado River from the WGFP at the most popular reaches in Gore Canyon and Pumphouse would be relatively minor. The number of days when flows fall within the preferred range for rafting and kayaking would decrease, but boating is still likely to continue when flows are outside of the preferred range. The majority of WGFP diversions occur in the spring and early summer when streamflow is high and there is ample water for recreational boating. WGFP diversions in the summer typically are low (average <100 cfs in July and <20 cfs in August). The anticipated impacts to boating in Gore Canyon and Pumphouse related to the WGFP are expected to be minor, thus, no specific change in WGFP diversions for boating are proposed other than for the Gore Race. The evaluation of impacts to boating in the Colorado River was revised in the Recreation section of the FEIS to simplify and clarify potential impacts.

Comment: Beyond participation in the ongoing Nutrient Studies of the Three Lakes and C-BT system, the Subdistrict should be required to follow any recommendations that come out of these studies.

Response: The purpose of the WGFP EIS is to disclose the effects of the WGFP and identify appropriate mitigation measures to avoid or minimize adverse effect. The ongoing Nutrient Studies of the Three Lakes system are primarily related to operation of the C-BT Project as it affects clarity in the Three Lakes system and Grand Lake. Nutrient mitigation measure for the WGFP will minimize and avoid increasing nutrients in the Three Lakes system s a result of the WGFP. The Northern Colorado Water Conservancy District (NCWCD) is committed to continued participation with Reclamation, Grand County, and other stakeholders in the evaluation of measures to improve water quality in the Three Lakes system. The NCWCD and Subdistrict are committed to working through the process and would contribute as appropriate to study recommendations.

Comment: The FEIS should include an evaluation of modified prepositioning.

Response: Section 3.5.4 includes a discussion of how modified prepositioning will maintain higher water levels in Granby Reservoir.

Comment: WGFP diversions should be coordinated with other water users to minimize impacts to Colorado River stream temperature. River modifications can also reduce impacts from low flows.

Response: The majority of WGFP diversions occur in the spring and early summer when flows are high and stream temperatures are low. The WGFP would allow diversions to occur later in the summer, primarily in wet years when stream temperatures are higher. Mitigation for temperature impacts is included in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict. See Section 3.8.4.2 for further discussion of temperature mitigation for the Colorado River. Temperature mitigation measures would reduce the potential for exceedance of the temperature standards and impacts to fish associated with operation of the WGFP. Other factors including low precipitation, diversions by others, and WWTP discharges also contribute to elevated stream temperatures, whether the WGFP is pumping or not. Denver Water's *Fish and Wildlife Mitigation Plan* for the Moffat Collection System Project (Moffat Project) includes temperature mitigation measures that would contribute toward reducing stream temperatures in the Colorado River.

In addition to the *Fish and Wildlife Mitigation Plans* developed by the Subdistrict as a component of mitigation for the WGFP and by Denver Water for the proposed Moffat Collection System Project pursuant to regulations implementing CRS 37-60-122.2(2), both the Subdistrict and Denver Water cooperatively developed separate *Fish and Wildlife Enhancement Plans* to further improve existing fish and wildlife resources. These enhancement plans were endorsed by the Colorado Wildlife Commission on June 9, 2011 and subsequently by the CWCB on July 13, 2011. The enhancement plans are intended to improve fish and wildlife resources over and above the levels existing without the WGFP and Moffat Project.

A separate Environmental Assessment (*Colorado Water Users' Commitment to Provide 10,825 acre-feet to the 15-Mile Reach of the Upper Colorado River*) evaluating releasing 5,412 AF from Granby Reservoir for Colorado River endangered species was released by Reclamation in September 2011. As proposed, the releases for endangered fish in the late summer/fall flow would improve flows and temperature during the time of the year when Colorado River flows are typically low. The "10825 Project" was added to the reasonably foreseeable actions in the WGFP FEIS and was used in the cumulative effects evaluation on stream temperature in Section 3.8.3.

Comment: Mitigation is needed to address algae problems in the Three Lakes.

Response: Section 3.8.4 of the FEIS includes a discussion of the nutrient mitigation measures designed to offset nutrient loading to the Three Lakes from additional WGFP pumping. These measures would offset the total nitrogen and total phosphorus loadings to the Three Lakes projected from the WGFP, compared to existing conditions. These measures would not only benefit the Three Lakes and deliveries to the East Slope during pumping, but would provide a year-round benefit to water quality in the lower Fraser River, Willow Creek, and the Colorado River.

Comment: Project proponents continue to ban the public from most recreation use of Windy Gap and stretches of the Colorado River upstream and downstream of the project. Why not allow fishing and hiking?

Response: Windy Gap Reservoir was established as a Watchable Wildlife Area when the project was constructed, at the request of the CDPW. There are also safety concerns with opening up the reservoir to public access because of the terrain, project facilities, and operations. The Subdistrict does not own or control stretches of the Colorado River above and below Windy Gap Reservoir.

Comment: Mitigation should include mandatory water conservation for water providers.

Response: To assure that Windy Gap water diverted to the eastern slope is used efficiently, participants will be required to acquire and maintain a state-approved water conservation plan in accordance with the Water Conservation Act of 2004 (Colorado House Bill 04-1365) as amended. This requirement will also be extended to any participant that acquires shares in the WGFP from the existing participants. Seven of the WGFP Participants have Colorado Water Conservation Board (CWCB)-approved plans, and other municipal water providers and water districts must acquire a CWCB-approved plan prior to delivery of WGFP water. Reclamation would require maintenance of a state-approved water conservation plan as a condition to a contract with Subdistrict WGFP Participants for use of C-BT facilities.

Comment: Include mitigation that requires the Subdistrict to add a representative to the Middle Park Water Conservancy District (MPWCD) board of directors.

Response: The MPWCD is a participant in the proposed WGFP. The suggested mitigation measure does not mitigate any project-related impacts.

Comment: Combine WGFP mitigation with Moffat Collection System mitigation to offset cumulative effects of both projects.

Response: The Subdistrict and Denver Water have been working together, along with Grand County and other West Slope entities, to develop proposed mitigation measures for each of the projects. As previously described the Subdistrict and Denver Water have each developed *Fish and Wildlife Mitigation Plans* for the WGFP and Moffat Project that have been adopted by the Colorado Wildlife Commission and Colorado Water Conservation Board.

In addition, the Subdistrict and Denver Water have prepared *Fish and Wildlife Enhancement Plans* to improve fish and wildlife resources over and above the levels existing without the WGFP and Moffat Project and the Colorado Wildlife Commission and Colorado Water Conservation Board have each endorsed these plans. Also, as part of negotiations between West Slope parties and Denver Water, Grand County and Denver Water have reached a proposed agreement that addresses some of the issues related to Denver Water's existing operations in Grand County (Denver Water 2011c). In the *Proposed Colorado River Cooperative Agreement*, Denver Water has committed to the Learning By Doing Cooperative Effort and additional resource commitments to provide environmental enhancements to benefit the aquatic environment in the Fraser, Williams Fork, and upper Colorado rivers. These commitments are contingent upon the issuance and acceptance by Denver Water of the permits necessary for construction of the Moffat Project. Resource commitments pertinent to the upper Colorado River basin with overlapping benefits in the WGFP project area that are not part of the previously described Moffat Project *Fish and Wildlife Enhancement Plan.*

The mitigation plans associated with the WGFP and the Moffat Project would reduce cumulative impact from these projects.

5000 Comments on EIS Process

Comment: The WGFP and Moffat Collection System Project should be combined in one EIS.

Response: The WGFP and Denver Water's Moffat Collection System Project are independent of one another, can proceed independent of each other, and do not need to be evaluated in a single EIS. A significant effort was made by the U.S. Army Corps of Engineers and Bureau of Reclamation to coordinate the hydrology modeling efforts for the Windy Gap Firming Project (WGFP) and Moffat Project EISs. Prior to initiating the modeling of EIS alternatives and cumulative effects for the Moffat Project and WGFP, the lead federal agencies for the EISs compared the hydrologic modeling approaches and tools. This process included reviews of Windy Gap diversions, Granby Reservoir, and Adams Tunnel flows simulated in PACSM, and Moffat Project and Roberts Tunnel flows simulated in the WGFP models. This process also included a detailed comparison of flows in the vicinity of the projects' diversions and is presented in the technical memorandum, *Comparison of Fraser River flows simulated in the WGFP CDSS model with those simulated in PACSM (Boyle 2005)*. Where possible, model data were compared on the two projects to assure that the WGFP and Moffat Project were reflected in a similar manner in each model. The cumulative effects analysis for the WGFP considered future diversions under the Moffat Collection System Project. Per the direction of the lead federal agencies for each EIS, hydrologic data were shared so that the model simulations of the WGFP and Moffat Project were consistent and in appropriate detail for each EIS. The cumulative effects analyses for the WGFP and Moffat Project also considered the same reasonably foreseeable water-based actions. As noted in the response to the previous comment the Subdistrict and Denver Water are coordinating on mitigation measures for the two projects.

Comment: A Supplemental EIS should be prepared.

Response: A Supplemental EIS is only needed if there are substantial changes in the proposed action or if significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts are identified. There are no substantial changes in the proposed action. Operation of the Preferred Alternative was modified slightly in the FEIS to mitigate potential impacts identified in the DEIS. These measures include modification to prepositioning to maintain higher water levels in Granby Reservoir and other mitigation measures to minimize and avoid adverse effects to other resources affected by the WGFP. No significant new information has been identified that materially changes the proposed action or discussion of environmental effects. Thus, no Supplemental EIS will be prepared.

6000 Legal and Regulatory Issues and other Comments

Comment: The DEIS failed to address Senate Document 80 (SD 80) and the provisions to protect the headwaters of the Colorado River system. WGFP impacts to flows, water quality, fishing, and other resources are contrary to the five guiding principles of SD 80. A decision on SD 80 should be made as part of the EIS.

Response: See responses to legal issues at the beginning of the responses to comments section.

Comment: The reduction in flows below Granby Reservoir would result in a violation of the "Principles to Govern the Release of Water at Granby Dam to Provide Fishery Flows Immediately Downstream in the Colorado River," which was approved on January 19, 1961.

Response: The proposed project will not affect Reclamation releases from Granby Reservoir in accordance with the 1961 principles. The 1961 Principles established the minimum flow releases from Granby Reservoir by Reclamation. Reduced flows below Granby Reservoir are a result of a reduction in the spill of Windy Gap water that was pumped from Windy Gap Reservoir to Granby Reservoir. These spills would occur less frequently because a new WGFP reservoir would increase available storage for Windy Gap water.

Comment: The Preferred Alternative includes prepositioning, which allows storage of C-BT Project water in Chimney Hollow Reservoir. This is not legal and could increase C-BT storage in Granby.

Response: See responses to legal issues at the beginning of the response to comments section.

Comment: How can a Municipal Subdistrict be allowed to use federal (C-BT) facilities to transport their water? What are the fees charged for this transport? Why are my federal tax dollars and federal facilities being used for an eastern slope water district?

Response: The Subdistrict is allowed to use excess capacity in the C-BT Project system that is not required for either storage or transport of C-BT Project water. This is consistent with Reclamation policy that allows such use. The proposed project may not adversely affect use of the C-BT Project for its authorized purposes. See responses to legal issues at the beginning of the responses to comments section.

Response to Form Letter Comments

A total of 714 individual written comments were submitted in either of two separate form letters. Individuals who submitted a form letter are listed alphabetically by last name in Table 4. The two form letters were coded and have been reproduced (following Table 4) with Reclamation's response to each of the numbered comments.

Table 4. Form letters by individual.

Last Name	First Name	Doc ID	Type ID
Aamot	Christopher	589	Form 2
Abrahamson	Brad	258	Form 1
Acee	Ron	1050	Form 1
Alderson	George and Frances	590	Form 2
Alfred	Lynda	427	Form 1
Allen	Michael	285	Form 1
Allen	Rich	591	Form 2
Amador	Terry	428	Form 1
Andersen	Kristen	429	Form 1
Anderson	Kurt	849	Form 2
Anderson	Victoria	850	Form 1
Andrews	Terry	430	Form 1
Angevine Ph.D.	Brian G.	307	Form 1
Anhorn	Sharon	592	Form 2
Anthony	Robert	851	Form 2
Apodaca	Mel	593	Form 2
Archer	Brian	594	Form 2
Archuleta	Jeff	595	Form 1
Arellano	Albert	431	Form 1
Arent	David	596	Form 2
Artale	Robert	432	Form 1
Aslami	Mohammad	852	Form 1
Asseff	Sam	597	Form 1
Babcock	Dan	433	Form 1
Bachmann	Patrick	210	Form 1
Baker	Brad	598	Form 1
Bandres	Annemarie	599	Form 2
Baranek	Petr and Dita	600	Form 2
Baranowski	Ruth	601	Form 1
Barrett	Barbara J.	434	Form 1
Barrett	Branon	853	Form 1
Barrett	William	854	Form 2
Bates	Matthew	259	Form 1
Batten	Bennett	435	Form 1
Batten	Bennett	855	Form 1
Baus	Sherry	602	Form 2
Baylin	Frank	436	Form 1
Beadleston	Marina	603	Form 1
Beaulieu	Dave	604	Form 1
Beaulieu	Shannon	857	Form 1
Beck	Charles	605	Form 2
Beckwith	Dr. Jill	606	Form 2
Beeman	Nancy	607	Form 2
Beeman	Wayne	608	Form 2
Bell	Gail	609	Form 2
Bell	W.C.	211	Form 1
Bennett	Douglas	308	Form 1
Benson	Sherry	858	Form 1
Benton	Clayton	610	Form 2
Benway	Charles M.	859	Form 1
Beranato	Philip	860	Form 1
Berendt	Nikolas	309	Form 1
Bernstein	Danny	260	Form 1
Bigger	John	611	Form 2
Black	Karina	862	Form 2
Blair	Peter	612	Form 2
Blasig	Roy A.	310	Form 1
Blubaugh	Kim	613	Form 2
Blubaugh	Kim	863	Form 1
Blumer	Marc	437	Form 1
Bocchino	John	864	Form 1
Bolinger	Ira Brett	311	Form 1
Bonetti	Donna	614	Form 2
Bonetti	Donna	615	Form 1
Bookman	John	1055	Form 1
Bosshard	Maureen	282	Form 1
Bourgeois	Paula	865	Form 1
Bowler	Brendan	438	Form 1
Bowsher	Nancy	866	Form 2
Boyd	Robert E.	439	Form 1
Bracken	Lisa	616	Form 1
Bradford	David	867	Form 2
Bradford	Deborah	617	Form 2
Bradford	Duke	1056	Form 1
Bradley	Ernest	261	Form 1
Bray	Annette	618	Form 2
Brennan	Joseph	619	Form 2
Breska	Jan	869	Form 2
Brideau	Edith	440	Form 1
Brinley	Bryan	441	Form 1

Last Name	First Name	Doc ID	Type ID
Brooks	S	620	Form 2
Brown	Boots	621	Form 1
Brown	Brian	262	Form 1
Brown	Douglas G.	442	Form 1
Brown	Ruth	622	Form 1
Bruell	Marc	443	Form 1
Brush	Debbie	870	Form 2
Brush	Debbie	871	Form 1
Bryant	Ned	444	Form 1
Bryers	Susan	623	Form 2
Buckles	Ronald	445	Form 1
Burger	Cynthia	1057	Form 2
Burkhardt	Kerry	624	Form 1
Burley	Penny	446	Form 1
Bushnell	Martha W.	872	Form 1
Buster	Katey	625	Form 2
Button	James	626	Form 2
Camell	Deanna	627	Form 2
Candee	Jonathan	263	Form 1
Carr	Colleen	874	Form 1
Carr	James	875	Form 1
Carren	Claire	628	Form 1
Carson	Catherine	629	Form 2
Carter	Deana	630	Form 2
Carter	Leslie	631	Form 2
Carter	Steven M.	632	Form 1
Caruthers	Scott	876	Form 1
Castan	Christine A.	447	Form 1
Castan	Christine A.	878	Form 2
Cataldo	Lisa	633	Form 2
Catlin	Barbara	879	Form 1
Cervene	Amy	634	Form 2
Cervene	Shirley	635	Form 1
Chamberlin	Dorothy	880	Form 1
Chamberlin	Dorothy and Richard	636	Form 2
Chiaramonte	Luciano	448	Form 1
Ching	Greg	637	Form 1
Ciampa	Mike	881	Form 1
Ciha	Jim	449	Form 1
Clapper	Willard L.	450	Form 1
Clark	Brian	638	Form 1

Last Name	First Name	Doc ID	Type ID
Clark	John	451	Form 1
Clark	Meg	639	Form 2
Clark	Robert	452	Form 1
Cleveland	Shelly	453	Form 1
Cliff	Elizabeth	640	Form 2
Clonts	Jeff	882	Form 1
Colbert	Ian	641	Form 2
Collins	Casey	642	Form 2
Collins	Elizabeth	643	Form 1
Condron	James	884	Form 2
Condron	Sharon	644	Form 2
Connaughty	Kevin	312	Form 1
Cook	Dennis	1064	Form 1
Cornely	John	264	Form 1
Courkamp	Jake	265	Form 1
Courson	Ron	885	Form 2
Courtney	Brian	455	Form 1
Covian	Mark A.	266	Form 1
Cox	Kelly	886	Form 1
Crane	Sherry	646	Form 2
Cranna	Michael	456	Form 1
Creswell	Richard	887	Form 2
Crowther	William	457	Form 1
Cunningham	Kirkwood	888	Form 1
Curlette	Diane	647	Form 1
Currie	Andrew	458	Form 1
Cushing	Colbert	890	Form 1
Cushing	Don	459	Form 1
Daehnick	Debbie	648	Form 2
Dahlin	Hope	891	Form 2
Davies	Alexey	649	Form 1
Decker	D. Todd	313	Form 1
DellaFera	Dr. MaryAnne	650	Form 2
DeNieu	Roberta	651	Form 2
Dick	Justin	892	Form 1
Dickman	Lisa	652	Form 2
Difiore	Greg	893	Form 2
DiGennaro	Louis	314	Form 1
Dikos	John	653	Form 2
Dillard	Kaela	654	Form 2
Dils	Reed	460	Form 1

Last Name	First Name	Doc ID	Type ID
Dittloff	David	894	Form 2
Dobbins	Scott	267	Form 1
Dobson	Dawn	461	Form 1
Dodge	Dayle	895	Form 1
Dodson	Craig	655	Form 1
Doll	Marice	896	Form 1
Doll	Sheryl	656	Form 1
Dombkowski	Linda	268	Form 1
Donnelly	Stephen	897	Form 1
Downing	Andrew	315	Form 1
Drew	Patrick	462	Form 1
Dunkle	Douglas	898	Form 1
Dunn	Bill	657	Form 2
Durian	Philip B.	463	Form 1
Dvorak	Bill	899	Form 1
Dvorak	Bill	902	Form 2
Edelstein Jr.	Robert N.	269	Form 1
Edwards	Carol	658	Form 1
Eggink	Irene	905	Form 2
Emrick	Ken	659	Form 2
Engelmann	Richard	660	Form 1
English	Rebecca	464	Form 1
Erickson	Sally	661	Form 2
Etheridge	Carol	217	Form 1
Evans	Ann	906	Form 2
Evans	Dinda	662	Form 1
Everett	Justin	465	Form 1
Fagerness	Mark	270	Form 1
Faherty	Mary	663	Form 1
Falk	Linda	664	Form 2
Farling	Scott	466	Form 1
Farrell	Courtney	467	Form 1
Farver	Suzanne	468	Form 1
Feigal	Mark	469	Form 1
Ferguson	Sheryl	665	Form 2
Fessler	Bryon	271	Form 1
Festag	Keith P.	316	Form 1
Fiegel	Mary	907	Form 2
Fiester Ph.D.	Thomas L.	470	Form 1
Findley	Stuart W.	219	Form 1
Fissinger	Kaye	667	Form 2
Fitzgerald	Bridget	668	Form 2
Folger	Jessica	669	Form 2
Forbes	Peter	471	Form 1
Foster	Teresa	670	Form 1
Fox	Jennifer	671	Form 1
Fox	Mary	908	Form 2
Frank	Brad	910	Form 1
Freeland	Chris	911	Form 1
Frontczak	Marie	913	Form 1
Fulks	James	472	Form 1
Fuller	Daryl	672	Form 1
Fuller	Michelle	673	Form 1
G	Stuart	473	Form 1
Gale	John W.	221	Form 1
Gardner	Hunter	272	Form 1
Garner	Michael	317	Form 1
Garton	Kenneth	475	Form 1
Gaskins	Mary Anne	674	Form 1
Gaunt	Pam	914	Form 2
Gerard	Marielle	675	Form 1
Gerk	Genise	915	Form 1
Gerlitz	Cheryl	476	Form 1
Giambartolomei	Marcia	676	Form 1
Gibbens	Stefanie	677	Form 1
Gibson	Alex	1070	Form 1
Gibson	Jim	477	Form 1
Gidley	Glen E.	318	Form 1
Giese	Mark M	478	Form 1
Gilfillan	David L.	479	Form 1
Gillette	J	917	Form 2
Gilsdorf	Daniel	273	Form 1
Gilstrap	Chris	918	Form 2
Glasscock	Michael W.	481	Form 1
Glenn	Karen	678	Form 1
Goad	John	319	Form 1
Goba	Agustin	679	Form 2
Goeken	Murlin	919	Form 2
Goff	Charles and Rebecca	483	Form 1
Goff	Rebecca	680	Form 1
Gonzales	Roger	920	Form 2
Gordon	Dave	922	Form 2
Gorecki	Sarah	681	Form 1

Last Name	First Name	Doc ID	Type ID
Gorsuch	Jason	320	Form 1
Gossage	Tim	484	Form 1
Gossert	Warren	682	Form 2
Gray	Blakely	923	Form 1
Gray	Dick	683	Form 2
Griest	Fred	684	Form 1
Griffin	John	1076	Form 1
Grigg	Jamin	485	Form 1
Groenert	Edward	685	Form 2
Grunder	L. Gail	686	Form 2
Guiles	Joseph	924	Form 1
Gull	Flournoy	925	Form 1
Gurarie	David	926	Form 1
Gustafson	Patricia	927	Form 2
Hagen	Dominic	928	Form 1
Hamel	Bob	1077	Form 2
Hanold	Dena	687	Form 1
Harden	Ronald	688	Form 1
Harding	Steve	930	Form 1
Harper	Jody A.	931	Form 2
Harrell	S G	932	Form 2
Harris	Jamie	689	Form 2
Harris	Seth	486	Form 1
Hart	Chuck	487	Form 1
Hartman	Eric	690	Form 2
Havrilla	Alysha	691	Form 2
Hayes	Stan and Sharon	1078	Form 1
Heard	Ann	1079	Form 2
Heimerl	Chris	274	Form 1
Heinrichsdorff	Gernot and Ava	692	Form 1
Heller	Robert	933	Form 1
Henry	Kendall	693	Form 1
Hensel	Charles	488	Form 1
Henshaw	Tom	694	Form 1
Hernden	Dave	489	Form 1
Hershberger	Jame C.	490	Form 1
Higuera	Mike	275	Form 1
Hill	Gerald E.	491	Form 1
Hilson	John	695	Form 2
Hilty	Bill	934	Form 1

Last Name	First Name	Doc ID	Type ID
Himelstieb	Pete	492	Form 1
Himelstieb	Pete	935	Form 1
Hoagland	Bruce S.	223	Form 1
Hoffman	John	696	Form 1
Hofsetz	Therron	493	Form 1
Hogan	J. Patrick	936	Form 1
Hogan	JaimiAnn	1080	Form 1
Hoidahl	Sharon	697	Form 1
Holtz	Dingo	494	Form 1
Horn	Charles	495	Form 1
Horowitz	Tina	698	Form 1
Houseworth	Bradley	937	Form 1
Howard	W Ray	938	Form 2
Howe	Larry	321	Form 1
Hoyer	Eric	699	Form 1
Hudson	Shelly	700	Form 2
Hugins	Chuck and Phyllis	701	Form 2
Hunt	Tom	322	Form 1
Hunter	Tim	702	Form 1
Huyler	Alice	496	Form 1
Ianni	Pamela	703	Form 2
Illg	Cathy	704	Form 2
Immel	Scott	497	Form 1
Ingersoll	George	940	Form 2
Jackaway	Adam	705	Form 1
Jackson	Tom	706	Form 1
James	Gordon	707	Form 1
Jameson	Michael	708	Form 2
Jenkins	Bill	941	Form 2
Jenkins	Crystal	709	Form 2
Jenkins	Susan	942	Form 2
Johann	Andrew	498	Form 1
Johnson	Ana	943	Form 1
Johnson	Brad	710	Form 2
Johnson	James	1082	Form 1
Johnson	Michael	711	Form 2
Johnson	Tim	499	Form 1
Johnson Jr.	Frank E.	323	Form 1
Jones	Christopher R	500	Form 1
Jones	Dennis C.	501	Form 1

Last Name	First Name	Doc ID	Type ID
Judkins	Peter	502	Form 1
Kamens	Ringo	276	Form 1
Kampen	David	503	Form 1
Keegan	Helen	946	Form 2
Keil	Bryan	947	Form 1
Keller	Charles	504	Form 1
Kelman	Ross	505	Form 1
Kelson	Elizabeth	712	Form 2
Ketels	Shaw	713	Form 1
Khristoforov	Mylee	948	Form 2
Kirkpatrick	Jim	277	Form 1
Kirschvink	James	714	Form 1
Klug	James	506	Form 1
Knight	Candice	715	Form 2
Knobloch	Keith	507	Form 1
Kollar	Chad	949	Form 1
Kondreck	Janine	950	Form 1
Korte	Mary	508	Form 1
Kraft	Victoria	716	Form 2
Kramer	Paul	717	Form 2
Kramer	Ted	1086	Form 1
Krol	Tom	228	Form 1
Kronewitter	Collette	718	Form 2
Kuberski	Mike	278	Form 1
Kuberski	Mike	1088	Form 1
Kuchel	Martha	719	Form 2
Kuehn	RJ	509	Form 1
Kuhlman	Kenton H.	324	Form 1
Kunkel	Michael	510	Form 1
L'Enfant	Lee	720	Form 2
Lacy	Duff	721	Form 1
Lade	Marlin	511	Form 1
Lampke	Karen	951	Form 1
Lance	Mark	512	Form 1
Landon	Kevin T.	513	Form 1
Langley	Bill	325	Form 1
Lanred	Berle	515	Form 1
Laptad	LisaJo	952	Form 1
Larime	Barbara	279	Form 1
Larimer	Preston	514	Form 1
LaRock	Ed	1089	Form 1
Larsen	Kara	953	Form 1
Larson	Duane	229	Form 1
Lauman	Dr. Pam	722	Form 2
Leavitt	Dr. David	723	Form 2
Lee	Erin	724	Form 1
Lee	Jason	1090	Form 1
Lemmon	John	954	Form 2
Levant	Mary	725	Form 2
Lewicki	Christopher	955	Form 1
Lien	David	516	Form 1
Lien	David	726	Form 2
Lightburn	Nadine	517	Form 1
Lightburn	Nadine	727	Form 2
Lindberg	Erik	280	Form 1
Link	Andrea	956	Form 2
Loesch	Rebecca	728	Form 2
Loftis	John E.	518	Form 1
Lohr	Margaret	230	Form 1
Long	Eileen	326	Form 1
Long	Jim	519	Form 1
Long	Leland	729	Form 2
Lorden	Tommy	281	Form 1
Lovato	Ray	1092	Form 2
Lucas	Kimberly	730	Form 2
Luciano	Aeric	958	Form 1
Lund-Bardi	Francesca	959	Form 1
Lyon	Kelly	520	Form 1
Lytle	Denise	731	Form 1
Mackie	Steve	732	Form 2
Madden DDS	Robert D.	327	Form 1
Mantey	Greg	733	Form 2
Marcum	James	521	Form 1
Marin	Dick	734	Form 2
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Martin	Christopher	735	Form 1
Mason	Mike	960	Form 1
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Matthews	Kevin M.	523	Form 1
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McCarthy	Sandra	738	Form 2
McClure	Burke and Carol	283	Form 1

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Mereness	Thomas	743	Form 2
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Miller	Josh	744	Form 1
Miller	Lisa	963	Form 2
Miller	Mark J.	286	Form 1
Miller	Michael	236	Form 1
Miller	Michael	1100	Form 1
Miller M.D.	Frederick M.	235	Form 1
Miracle	Robert	964	Form 1
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Moe	Mark R.	530	Form 1
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Moore	Sherri	533	Form 1
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Murray	Margaret	747	Form 2
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Napier	Warren	536	Form 1
Neil	Michael	749	Form 2

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Nichols	Carol	752	Form 1
Nickum	David, Lisa	1105	Form 1
Noble	Ashley	537	Form 1
Nolan	Natalie	753	Form 1
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Norton	Jeff	969	Form 1
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Oldham	Brendan	973	Form 2
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Olk	Todd	538	Form 1
Olmsted	Charles	975	Form 2
Olson	Deb	976	Form 1
Olson Ph.D.	Sherry L.	755	Form 2
Om	Joy	756	Form 1
Oppegard	Lydia	757	Form 2
Osborne	Joe	334	Form 1
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Pardikes	James	539	Form 1
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Patin	Lori	761	Form 2
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Peternell	Drew	545	Form 1
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Piske	David F	766	Form 1

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Recker	Julie	773	Form 2
Reed	Joan-Marie	774	Form 1
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Rees	Michael	775	Form 1
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Rilling	Ann	551	Form 1
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Robertson	Gregory	780	Form 2
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Santellen	Art	340	Form 1
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Saum	George	790	Form 2
Saunders	Ann	995	Form 1
Saxon	Russell	555	Form 1
Schilling	Judith A	791	Form 2
Schoch	Douglas	792	Form 2
Schrotenboer	Susie	793	Form 1
Schultz	Larry	999	Form 1
Schultz Ph.D.	Arnold L.	556	Form 1
Schultz Ph.D.	Arnold L.	998	Form 2
Schulz	Nancy	794	Form 2
Scoggins	Jay	295	Form 1
Scoggins	Teresa	294	Form 1
Scrima	Lawrence	795	Form 2
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Seaverns	Ken	341	Form 1
Sessions	Larry	796	Form 2
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Shannon	Robert	1001	Form 1
Sheets MD	Ronald R.	342	Form 1
Sherm	Bill	797	Form 2
Shickman	Muriel	798	Form 2
Shinkle	Douglas	558	Form 1
Shirek	Beth	1002	Form 2
Shoenfeld	Greg	799	Form 2
Shotwell	Andreia	800	Form 2
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Sprowl	Christopher	247	Form 1
Steele	Dr L.	1013	Form 2
Steele	John	1012	Form 1
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Steimkamp	Caleb	807	Form 1
Stephens	Tim	808	Form 1
Stettner	Robert	346	Form 1
Steve	Glazer	482	Form 1
Stewart	Laurence	809	Form 2
Stewart	Robert	1014	Form 1
Still	Christy	564	Form 1
Still	John	1015	Form 1
Stock	Erica	1016	Form 1
Stout	Gene	810	Form 2
Strand	Peter	565	Form 1
Stredwick	Tom	298	Form 1
Strickland	Clay	1019	Form 1
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Stucky	Michael	567	Form 1
Stuhaan	Sandy	811	Form 2
Sudduth	Alice	812	Form 2

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Sullivan	Cindy	813	Form 2
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Swinderman	Gail	1022	Form 2
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Sypal	Steve	572	Form 1
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Taylor	John	299	Form 1
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Tempelman	Steven	1025	Form 2
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Terry	Noalani	1026	Form 1
Terwilliger	Gerald	817	Form 1
Tharp	Thomas	818	Form 1
Therien	Yannick	347	Form 1
Thompson	Jeff	573	Form 1
Thompson	Ron	1125	Form 1
Thrailkill	James	819	Form 2
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Tinus	Carolyn	1027	Form 2
Tomasso	Gerard I.	574	Form 1
Tracy	Christopher	820	Form 2
Travis	Scott	1028	Form 1
Trefry	Kathleen	821	Form 2
Treufeldt-Franck	Annette	1029	Form 2
Turco	Michelle	822	Form 2
Turner	Wayne and Kathy	575	Form 1
Unrau-Goring	Brent	823	Form 1
Van Buskirk	Rick D.	301	Form 1
Van WInkle	Wynona	825	Form 2
Van Wyk	Mark	348	Form 1
Vanderkooi	Dr. Lois	824	Form 2
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Vialpando	Mark	577	Form 1
Vivian	Bonnie	578	Form 1
Voggesser	Carrie	1031	Form 2

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Voggesser	Garrit	1033	Form 2
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Voth	Jeff	349	Form 1
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Wagner	Dr. G. Blu	829	Form 2
Wagner	Robert	580	Form 1
Walcott	Craig	581	Form 1
Walek	Kathleen	830	Form 1
Walford	Cameron	582	Form 1
Wallace	Michael	302	Form 1
Waltz	Rev. William L.	583	Form 1
Ward	Jesse	831	Form 1
Warren	Teneke	1035	Form 2
Washburn	Pauline	832	Form 2
Wathen	Wayne	833	Form 1
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Webber	Elisabeth	1037	Form 2
Weiss	David K.	303	Form 1
Weiss	Stuart	1038	Form 2
Weissenberger	Erik	304	Form 1
West	Stephen	584	Form 1
Westgaard	Suzanne	1040	Form 2
Wheeler	Karen	834	Form 2
White	Karin	835	Form 2
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Whyman	Roger	838	Form 2
Wilber Jr.	George E.	350	Form 1
Wildgen	Kevin B.	351	Form 1

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Williams	Linda	841	Form 2
Williams	Mary Ellen	1041	Form 2
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Wolf	Bernard	352	Form 1
Wolf	Martin	1043	Form 1
Wood	Joyce	1044	Form 2
Woodford	Michael	1045	Form 2
Woodworth	Kerala	1137	Form 1
Wooley	Kurt	254	Form 1
Woznick	Theo	1046	Form 2
Wright	Jan	843	Form 2
Writz	Robert	844	Form 1
Wurster	Ben	353	Form 1
Ycas	Trevor	845	Form 1
Young	Claudia	846	Form 2
Young	Lucas	585	Form 1
Youngson	Patricia	847	Form 1
Zacharczyk	Phillip	1048	Form 1
Ziegelman	Kevin D.	305	Form 1
Zinn	Lennard	586	Form 1
Zipp	Alexander	587	Form 1
Zubaedi	Omar	1049	Form 2
Zuboy	Jim	588	Form 1
Zumbrennen	Joseph	306	Form 1

Form Letter 1

Com-ment	Form Letter 1	Response
1 2 3 4 5	**From:** **To:** WTULLY@gp.usbr.gov; **Subject:** Citizen Comment on the Windy Gap Firming Project **Date:** Friday, December 19, 2008 5:18:17 PM Will Tully 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	1. A Supplemental EIS is only needed if there are substantial changes in the proposed action or if significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts are identified. There are no substantial changes in the proposed action. Operation of the Preferred Alternative was modified slightly in the FEIS to mitigate potential impacts identified in the DEIS. These measures include modification to prepositioning to maintain higher water levels in Granby Reservoir and other mitigation measures to minimize and avoid adverse effects to other resources affected by the WGFP. No significant new information has been identified that materially changes the proposed action or discussion of environmental effects. Thus, no Supplemental EIS will be prepared. 2. The WGFP EIS fully considered the cumulative impacts of the Moffat Collection System Project, as well as past, present, and other reasonably foreseeable future actions. The cumulative effects analysis for resources was analyzed in the same level of detail as the direct impacts of the WGFP. 3. The Grand County Stream Management Plan (SMP) was considered during preparation of the EIS. Our understanding is that the objective of the SMP was to develop recommendations of preferred streamflow regimes to support stream health for aquatic habitat and other nonconsumptive water uses, as well as the flow regimes necessary to support water use requirements for irrigators, municipalities, industry, and recreation. The focus of the EIS was to evaluate and disclose the anticipated environmental effects of the alternatives. Where adverse effects were identified, mitigation measures were identified to offset or minimize those impacts. The mitigation measures developed for the WGFP are linked to identified project impacts and may not necessarily meet the target recommendations included in the SMP. The target goals in the SMP indicate optimum flows for maximizing aquatic habitat. Such flows may not be available considering water rights already issued by the State of Colorado. However, mitigation measures included in the FEIS, including the *Fish and Wildlife Mitigation Plan* developed with the CDPW, would help meet some of the goals of the SMP. The Subdistrict also is working with Grand County, other West Slope entities, and Denver Water to better coordinate and operate facilities to benefit aquatic life. 4. Evaluation and potential designation of portions of the Colorado River as Wild and Scenic is a separate and ongoing process being conducted by the Bureau of Land Management (BLM). BLM will complete the suitability evaluation as part of its RMP revision process with recommendations given in a Draft EIS that was released on September 16, 2011. BLM's policy is to manage and protect eligible river segments so as not to adversely constrain the suitability assessment or any

5	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.	subsequent recommendations to Congress. River or stream segments must be found eligible and suitable to be considered for designation in the National Wild and Scenic Rivers System and only Congress or the Secretary of the Interior can designate segments. Recreational values are among the outstanding remarkable values identified for each river segment. The EIS discusses and acknowledges this ongoing process in the Recreation section. While the effects to river recreation described in the EIS could relate to the recreational values along the Colorado River, it is BLM's responsibility to determine the suitability of each reach being considered for Wild and Scenic designation. 5. Additional stream temperature and climatic data became available following the initial analysis of temperature impacts for the DEIS. Subsequently, a dynamic temperature model (Hydros 2011) was developed with input and review by EPA to simulate weekly average temperatures and daily maximums for the Colorado River between Windy Gap Reservoir and the Williams Fork for existing conditions and the alternatives. The model simulations were conducted for the months of June through September using the very warm observed climatic data from 2007. Results of this analysis indicated that increased exceedance of the chronic MWAT and acute DM standards would occur in July and August of some years. Specifically, temperature standard exceedances were simulated to increase from existing conditions in 4 out of the 15 years evaluated with additional WGFP diversions. For these years, the dynamic modeling indicated that the MWAT standard would be exceeded for several consecutive days or weeks and the DM would be exceeded up to several additional days, when simulated with the very warm 2007 meteorology. Mitigation for temperature impacts is included in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict. See Section 3.8.4.2 for further discussion of temperature mitigation. Temperature mitigation measures would reduce the potential for exceedance of the temperature standards and impacts to fish associated with operation of the WGFP. Other factors including low precipitation, diversions by others, and WWTP discharges also contribute to elevated stream temperatures, whether the WGFP is pumping or not.
6	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.	6. To assure efficient use of Windy Gap water on the eastern slope, the WGFP Participants will be required to acquire and maintain a state-approved water conservation plan in accordance with the Water Conservation Act of 2004 (Colorado House Bill 04-1365) as amended. This requirement will also be extended to any participant that acquires shares in the WGFP from the existing participants. Seven of the WGFP Participants have Colorado Water Conservation Board (CWCB)-approved plans, and other municipal water providers and water districts have committed to acquiring a CWCB-approved plan prior to delivery of WGFP water. Reclamation would require maintenance of a state-approved water conservation plan as a condition to a contract with Subdistrict WGFP Participants for use of C-BT facilities. Other options like dry year leasing would not provide the reliable long-term water supplies needed to meet projected needs.

Form Letter 2

Com-ment	Form Letter 2	Response
	From: _____ To: wtully@gp.usbr.gov Subject: Windy Gap Firming Project DEIS Comment Date: Wednesday, December 24, 2008 11:49:38 AM Dec 24, 2008 Mr. Will Tully 11056 W. CR 18E Loveland, CO 80537 Dear Mr. Tully,	
1	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. Supplemental EIS is only needed if there are substantial changes in the proposed action or if significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts are identified. There are no substantial changes in the proposed action. Operation of the Preferred Alternative was modified slightly in the FEIS to mitigate potential impacts identified in the DEIS. These measures include modification to prepositioning to maintain higher water levels in Granby Reservoir and other mitigation measures to minimize and avoid adverse effects to other resources affected by the WGFP. No significant new information has been identified that materially changes the proposed action or discussion of environmental effects. Thus, no Supplemental EIS will be prepared.
2	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 discussion of climate change in Section 2.8.2 Reasonably Foreseeable Actions was revised in the FEIS. This section includes updated information from recent publications on climatic change trends in the Upper Colorado River basin and possible future changes. Potential environmental impacts from climate change are qualitatively evaluated as part of the cumulative effects evaluation for applicable resources in Chapter 3 of the FEIS.
3	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. The hydrologic model used to evaluate resource impacts provides a reasonable basis for comparing the alternative actions to existing conditions. The responses to Comment Letter No. 1075 (Comment Nos. 1 to 5) provide more detail. The Recreation section of the FEIS includes a revision of the analysis of boating impacts related to changes in preferred flows to simplify and clarify potential impacts. The Aquatic Resource section of the FEIS also includes presentation of revised material to better characterize impacts to aquatic life.
4	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.	
5	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.	
6	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.	
7	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.	

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8	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.	4. Construction of Chimney Hollow Reservoir would result in the inundation and loss of range for big game species such as elk and deer, and foraging habitat for black bear. The new reservoir would affect movement patterns for big game, but would not impact any specifically defined mitigation route. The loss in winter range represents about 0.2 percent of the available winter range in the CDPW Game Management Unit. Proposed mitigation includes habitat improvement and management measures to enhance wildlife at Chimney Hollow. Mitigation measures are part of the *Fish and Wildlife Mitigation Plan* developed in cooperation with the CDPW (FEIS Appendix E). 5. The WGFP EIS fully considered the cumulative impacts of the Moffat Collection System Project, as well as past, present, and other reasonably foreseeable future actions. The cumulative effects analysis for resources were analyzed in the same level of detail as the direct impact of the WGFP. 6. The Grand County Stream Management Plan (SMP) was considered during preparation of the EIS. Our understanding is that the objective of the SMP was to develop recommendations of preferred streamflow regimes to support stream health for aquatic habitat and other nonconsumptive water uses, as well as the flow regimes necessary to support water use requirements for irrigators, municipalities, industry, and recreation. The focus of the EIS was to evaluate and disclose the anticipated environmental effects of the alternatives. Where adverse effects were identified, mitigation measures were identified to offset or minimize those impacts. The mitigation measures developed for the WGFP are linked to identified project impacts and may not necessarily meet the target recommendations included in the SMP. The target goals in the SMP indicate optimum flows for maximizing aquatic habitat. Such flows may not be available considering water rights already issued by the State of Colorado. However, mitigation measures included in the FEIS *Fish and Wildlife Mitigation Plan* developed with the CDPW, would help meet some of the goals of the SMP. The Subdistrict also is working with Grand County, other West Slope entities, and Denver Water to further develop mitigation and better coordinate and operate facilities to benefit aquatic life. 7. Evaluation and potential designation of portions of the Colorado River as Wild and Scenic is a separate and ongoing process being pursued by the BLM. Recreational values are among the outstanding remarkable values identified for each river segment. This process is described in the Recreation section of the DEIS. While the effects to river recreation described in the DEIS could relate to
9	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.	

Com-ment	Form Letter 2	Response
		the recreational values along the Colorado River, BLM is ultimately responsible for determining whether or not a certain reach of the river meets the criteria for designation as Wild and Scenic. 8. Additional stream temperature and climatic data became available following the initial analysis of temperature impacts for the DEIS. Subsequently, a dynamic temperature model (Hydros 2011) was developed with input and review by EPA to simulate weekly average temperatures and daily maximums for the Colorado River between Windy Gap Reservoir and the Williams Fork for existing conditions and the alternatives. The model simulations were conducted for the months of June through September using the very warm observed climatic data from 2007. Results of this analysis indicated that increased exceedance of the chronic MWAT and acute DM standards would occur in July and August of some years. Specifically, temperature standard exceedances were simulated to increase from existing conditions in 4 out of the 15 years evaluated with additional WGFP diversions. For these years, the dynamic modeling indicated that the MWAT standard would be exceeded for several consecutive days or weeks and the DM would be exceeded up to several additional days, when simulated with the very warm 2007 meteorology. Mitigation for temperature impacts is included in the *Fish and Wildlife Mitigation Plan* developed by the Subdistrict. See Section 3.8.4.2 for further discussion of temperature mitigation. Temperature mitigation measures would reduce the potential for exceedance of the temperature standards and impacts to fish associated with operation of the WGFP. Other factors including low precipitation, diversions by others, and WWTP discharges also contribute to elevated stream temperatures, whether the WGFP is pumping or not. 9. To assure efficient use of Windy Gap water on the eastern slope, the WGFP Participants will be required to acquire and maintain a state-approved water conservation plan in accordance with the Water Conservation Act of 2004 (Colorado House Bill 04-1365) as amended. This requirement will also be extended to any participant that acquires shares in the WGFP from the existing participants. Seven of the WGFP Participants have Colorado Water Conservation Board (CWCB)-approved plans, and other municipal water providers and water districts have committed to acquiring a CWCB-approved plan prior to delivery of WGFP water. Reclamation would require maintenance of a state-approved water conservation plan as a condition to a contract with Subdistrict WGFP Participants for use of C-BT facilities. Other options like dry year leasing would not provide the reliable long-term water supplies needed to meet projected needs.