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To: Bureau of Reclamation
LC Region, Phoenix Office
Fax 623-773-6481

From: Dr. Glenn Haas
Colorado State University/
Aukerman, Haas and Associates
3403 Green Wing Court
Fort Collins, CO 80524
970-498-9350
glennehaas@comcast.net



Subject: Personal Opinion Comments by Dr. Glenn E. Haas on the Draft Environmental Assessment for the Proposed Construction and Operation of the Scorpion Bay Marina and Yacht Club

In response to your public solicitation for input, I have reviewed your draft EA and submit the following comments. Thank you for the opportunity.

1. **The draft EA is not legally sufficient.** The draft environmental analysis is a descriptive environmental report and not an environmental analysis in my opinion. While the draft acknowledges that the proposed project will have many effects (e.g., increased noise, increased visitation, change in type of recreation opportunities, impact on future management program and costs, increased conflicts, people being displaced to other areas, impact on adjacent wilderness), it does not provide an analysis of these effects either singularly or collectively. That is, in my judgment the level of recreation impact analysis is not commensurate with the potential consequences of the proposed project.

H-1

2. **Insufficient range of alternatives.** It appears that the range of future alternatives is constrained and being dictated by a third party developer who has determined what they would like to build. The alternatives are narrow and not balanced in analysis, leading one to speculate if the decision is predisposed and that the environmental documents have been prepared to defend an apriori decision. An expansion of the history and the basis of this project may dismiss this impression.

H-2

3. **Unreasonable approach to recreation supply and demand analysis.** Reclamation has recently prepared guidance on how to inventory and assess recreation supply (i.e., WROS) and recreation demand (i.e., Demand Estimation Guidebook) for the purpose of planning and decision making. The draft EA for this proposed project indicates that Reclamation's WROS tool would be implemented "within one year of the project start." This is unreasonable and backwards. This is akin to the Bureau starting construction on a dam before its supply and demand analysis is complete; or a developer starting construction on a high-rise condominium project in downtown Phoenix before conducting a supply and demand analysis. Furthermore, by starting construction before an adequate analysis, future options and alternatives are effectively foreclosed.

H-3

4. **Boating capacity analysis is insufficient.** A significant issue for consideration of this proposed project is that of visitor capacity (both land-based and water-based). The discussion of boating capacity in the draft EA is confusing, limited, and does not adequately utilize the best available "approach". A more rigorous analysis of the boating and land-based visitor capacity is needed to sufficiently compare and contrast the alternatives as part of the planning process.

H-4

5. **The effects of this project are likely to be significant.** This is a large development proposal that in my judgment will have significant effects and would benefit from a full EIS analysis. The draft does not provide sufficient evidence and analysis to conclude with a FONSI. Furthermore, the visiting public and community would be better served by implementing a full and rigorous EIS process rather than re-drafting the current environmental assessment.

H-5

I sincerely hope these comments are received in the constructive manner they are intended.

RESPONSE TO COMMENT LETTER NO. H
DR. GLENN HAAS

- H-1. We disagree. We believe the EA adequately identifies and analyzes the potential impacts resulting from constructing and operating a new marina at Lake Pleasant. The EA also identifies mitigation measures that would reduce potential adverse impacts to the human environment. According to Council on Environmental Quality regulations, an EA is intended to “briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact” (see 40 CFR § 1508.9). We believe the EA provides a sufficient level of analysis for this purpose.
- H-2. Please see Reclamation’s general response to Comment Letter 17, especially regarding “Tiering,” “Purpose and Need,” and “Alternatives Including the No Action Alternative.”
- H-3. Please see the general response to Comment Letter 17 regarding “Lake Carrying Capacity.” We do not believe the proposed project, which would be implemented in phases over a number of years based upon demand, would constrain this future WROS study.
- H-4. The planning process for the LPRP MRP was completed in 1995. Please see Reclamation’s general response to Comment Letter 17 regarding “Tiering.” Much of the land-based recreational developments identified in the MRP have been constructed. The location of the proposed marina is consistent with the MRP and would not adversely affect or constrain implementation of any of the remaining land-based recreational developments. Please also see Reclamation’s response to Comment H-3.
- H-5. Your beliefs that the effects of this project are likely to be significant and that an EIS would be beneficial are noted.