



TOWN OF GRANBY

Jynnifer Pierro

Mayor

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Scott Franklin, Moffat EIS Project Manager
Corps Denver Regulatory Office
9307 S. Wadsworth Blvd.
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Dear Mr. Franklin:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Moffat Collection System Project. The Town of Granby is at the downstream end of the Fraser River Valley and will be affected by the proposed additional diversions. We are deeply concerned about the effects this will have on our ability to provide water to the residents of our community. The Town treats water from the Fraser River for culinary purposes and distributes this water to the people who live in Granby.

This past year we saw higher than average flows in the Fraser River through June and July, but typical low flows in August and September as the flow in the Fraser subsided significantly. This occurs annually as the snow melt decreases and higher elevation runoff declines. These low flow times make it extremely difficult to adequately supply water as needed. Proposed additional Moffat diversions will increase the negative impacts and the ability of Granby to supply water to the Town's residents.

Mitigations proposed in the DEIS for the impact on the Town of Granby are woefully inadequate. These proposed mitigations do not properly address increased concentrations of runoff nutrients and pollutants and the increased water temperatures that will occur should the flow during the summer months be decreased. It appears that water temperatures will be allowed to exceed State standards for a quality stream. These factors have a significant impact on the Town's ability to treat water for culinary consumption. The Town's treatment facility is 26 years old and we will have increased difficulty treating potable water to meet EPA and Colorado Department of Public Health and Environment requirements for drinking water.

The DEIS does not offer an adequate consideration of alternatives, partly based upon the extremely narrow definition of "purpose and need." The suggested range of alternatives is nearly identical to the definition of "purpose and need."

We understand that the additional diversions could be diverted during a wet year following a drought. This procedure does not address the problem of depleting ground and alluvial water that occurs during a drought year, it only exacerbates the effects of a dry year on the surrounding

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riparian environment. More often than not, it takes three to four years following a drought to replenish the surrounding riparian environment.

Acknowledgement is made in the DEIS that there are fragile environmental conditions projected in 2016 (i.e. low flows substantial effluent, etc), but the report does not address the NEPA guidelines that say the DEIS should state whether resources are healthy, deteriorating or considerably compromised. Conditions as they now stand may be at such a seriously compromised condition that the environment is at a tipping point and “future water projects [that] would have limited new effects” would create a situation from which the Fraser River environment would be unable to recover.

Cumulative effects of this project and the Windy Gap Firing Project are not adequately addressed for our reach of the Fraser River and there are no real mitigation measures for these cumulative impacts that will most certainly occur. We are of the opinion that these two projects need to be adequately and completely analyzed with appropriate mitigation measures to the impacts to the Colorado River below the Windy Gap diversion structure and to Granby Lake, Shadow Mountain Lake and Grand Lake.

Our community, as with other communities along the Fraser/Colorado Rivers drainage, depends upon tourism to remain sustainable. Fishing is a big part of the tourism that occurs throughout the region. Impacts to fishing on the Fraser River or its tributaries have not been properly addressed and no quantitative conclusions were made. The DEIS states there would be no impacts to fishing on Williams Fork and the Colorado Rivers. However, the DEIS does not provide a baseline or identify current conditions regarding fishing other than a qualitative mention of some public access location and observation of the number of anglers visible at one time. The document provides no information about the relationships between fishing and lower stream flows, higher water temperatures and degraded water quality conditions.

These are merely a few of the immediate concerns we have with the draft environmental impact statement. These issues directly affect the Town of Granby but have not been adequately addressed and the mitigations proposed are woefully inadequate.

We would urge you to reject this draft completely and send it back to Denver Water to correct the deficiencies prior to any further consideration of a US Army Corps of Engineers permit being issued.

Very truly yours,

Jynnifer Pierro
Mayor

Cc: Town Board
Grand County Commissioners
Towns of Winter Park, Fraser, Grand Lake, Hot Sulfur Springs