XIII. Form Letters

Introduction

This section centers on more than 100 form letters concerning the Navajo Reservoir Operations DEIS, representing over one-third of all letters sent to Reclamation during the public comment period. The form letters are, by definition, essentially the same, but they differ slightly, as follows:

1. Most are a four-point letter (some of these omit the last standard paragraph)—59 received.

2. Fewer are the four-point form letter, with slight modifications—39 received.

3. There is also a five-point form letter relating to the San Juan River fishery that differs from sender to sender only in the dollar amount spent on fishing—8 received, or with additional comment—2 received.

4. Two letters with slight variations on the form letters were also received.

For purposes of response, the three main versions of the four-point form letter (above) are printed, and responses are given at the side on the same page. To avoid needless duplication, the form letters are printed only once.

Issued Raised

- Ninety-five of the form letters submitted centered on the following:

  - Questions as to whether costs of modifying Navajo Reservoir Operations should be attributed to the ALP Project rather than the ALP Project being considered a benefit of Navajo Reservoir Operations

  - Various questions about the accuracy and integrity of the formulation process and viability of the alternatives

  - Flow Recommendations implementation questions and issues/ impacts related to full development and flexibility

  - Issues about impacts analysis and its adequacy, mitigation, and irreversible/ irretrievable resource commitments

- Concern about the methods used to compute impacts to trout fishing and related effects in the local economy

❑ Fifteen additional letters expressed concern about changes in the quality of the fishery or the angling experience.

Individuals Included (by Surname)

Adkins
Angel
Armstrong
Arner
Baker
Barns
Bitonti
Briscoe
Buyok
Cayne
Chaulk
Chaulk
Ciluffo
Collzer
Cooper
Coubrough
Crabtree
Darnell
Decker
DePire
Duncan
Emmons
Ergel
Ewing
Forrest
Gaudette
Giovanini
Giovanini
Gladstone
Goodwin
Gurney
Hadley
Hagedorn
Haxton
Hecht
Helmick
Hitchcock
Holmes
Hopper
Hurtado
Islac
Johnston
Jones
Kahwajy
Ketron
Kloskowski
Kozan
Kwist
Larson
LoCricchco
Loubet
Marcy
Marcy
Martinez
Martinez
McGuigan
Miller
Miller
Mittman
Moore
Mora
Murphy
Newton
Nichols
Nickles
Padilla
Padilla
Parise
Peter
Petty
Phillips
Potenza
Poutre
Poutre
Raffety
Raths
Ray
Reading
Rees
Rhien
Rodgers
Rosebrough
Scherer
Seifelt
Sevier
Shepard
Smith
Smouse
Spires
Sproul
Squier
Stankiewicz
Swann
Tatman
Terry
Todd
Torrison
Turpin
VanValkenburg
Vigil
Walker
White
White
White
Wiebe
Williams
Wilson
Wollerman
Youngblood
Zelhart
Zobay
Zwiener

From: bobk@IFFA.org.uk
To: <kbeck@uc.usbr.gov>
Date: 10/30/02 9:48AM
Subject: San Juan River

Ken Beck
Bureau of Reclamation
Western Colorado Area Office
835 East Second Ave., Ste. 400
Durango CO 81301

To Ken and the Bureau of Reclamation

I understand that the Bureau of Reclamation(BOR) is proposing changing the flows from Navajo Dam on the San Juan River from a 500 cfs minimum to a 250 cfs minimum. I am an avid fly fisher who has been to the San Juan every year for the past ten years. I spend about $1500.00 to fish the San Juan every year. I believe that these types of flows will be detrimental to this great river for several reasons:

€ The areas around the San Juan River will be economically impacted severely, jobs and businesses will be lost. 1
€ The habitat of the river for the aquatic life, as well as the other wildlife that uses the river, will be decreased by 34%. 2
€ The trout population that is considered to be one of the healthiest in the US will be decreased by 20-30%. 3
€ The lack of water flowing through the river will increase sedimentation, thus decreasing the habitat even further. 4
€ The low flows, especially in the summer months, will allow for more pollution and poorer water quality. 5

I have been lucky enough in my travels to get a chance to experience the beauty of this area and the wonderful fishing it has to offer. I believe that the low flows will impact this area so greatly that my children and their children will not be able to have the same experience in the future. I hope they do. The BOR should do the right thing and keep the flows at a 500 cfs minimum. 6

Sincerely

Bob Kloskowski

International Fly Fishing Association
222 W. Alderson Street
Bozeman, Montana 59715
USA

http://www.IFFA.org.uk
bobk@IFFA.org.uk

FLTYPE1-1 Please see the responses to General Comments 29 and 31.

FLTYPE1-2 Please see the response to General Comment 30.

FLTYPE1-3 Please see the response to General Comment 30.

FLTYPE1-4 Under the Preferred Alternative, peak releases from Navajo Dam are anticipated to be sufficient to scour and transport sediment down the river. See the response to General Comment 28 which discusses rafting and sedimentation.

FLTYPE1-5 Please see the resonse to General Comment 23.

FLTYPE1-6 Please see the responses to General Comments 3 and 16.

Ken Beck
Bureau of Reclamation
Western Colorado Area Office
835 East Second Ave., Ste. 400
Durango CO 81301

To Ken and the Bureau of Reclamation

I understand that the Bureau of Reclamation (BOR) is proposing changing the flows from Navajo Dam on the San Juan River from a 500 cfs minimum to a 250 cfs minimum. I am an avid fly fisher who has been to the San Juan the last five years with a standing group of 10 fishermen. This is an annual event with my friends and my sons. I spend about $1,500 to fish the San Juan every year. I saw the effect of the flow reduction last year and am concerned about the effects on my trip next year. I believe that these types of flows will be detrimental to this great river for several reasons:

The areas around the San Juan River will be economically impacted severely; jobs and businesses will be lost. The habitat of the river for the aquatic life, as well as the other wildlife that uses the river, will be decreased by 34%. The trout population that is considered to be one of the healthiest in the US will be decreased by 20-30%. The lack of water flowing through the river will increase sedimentation, thus decreasing the habitat even further. The low flows, especially in the summer months, will allow for more pollution and poorer water quality. 1

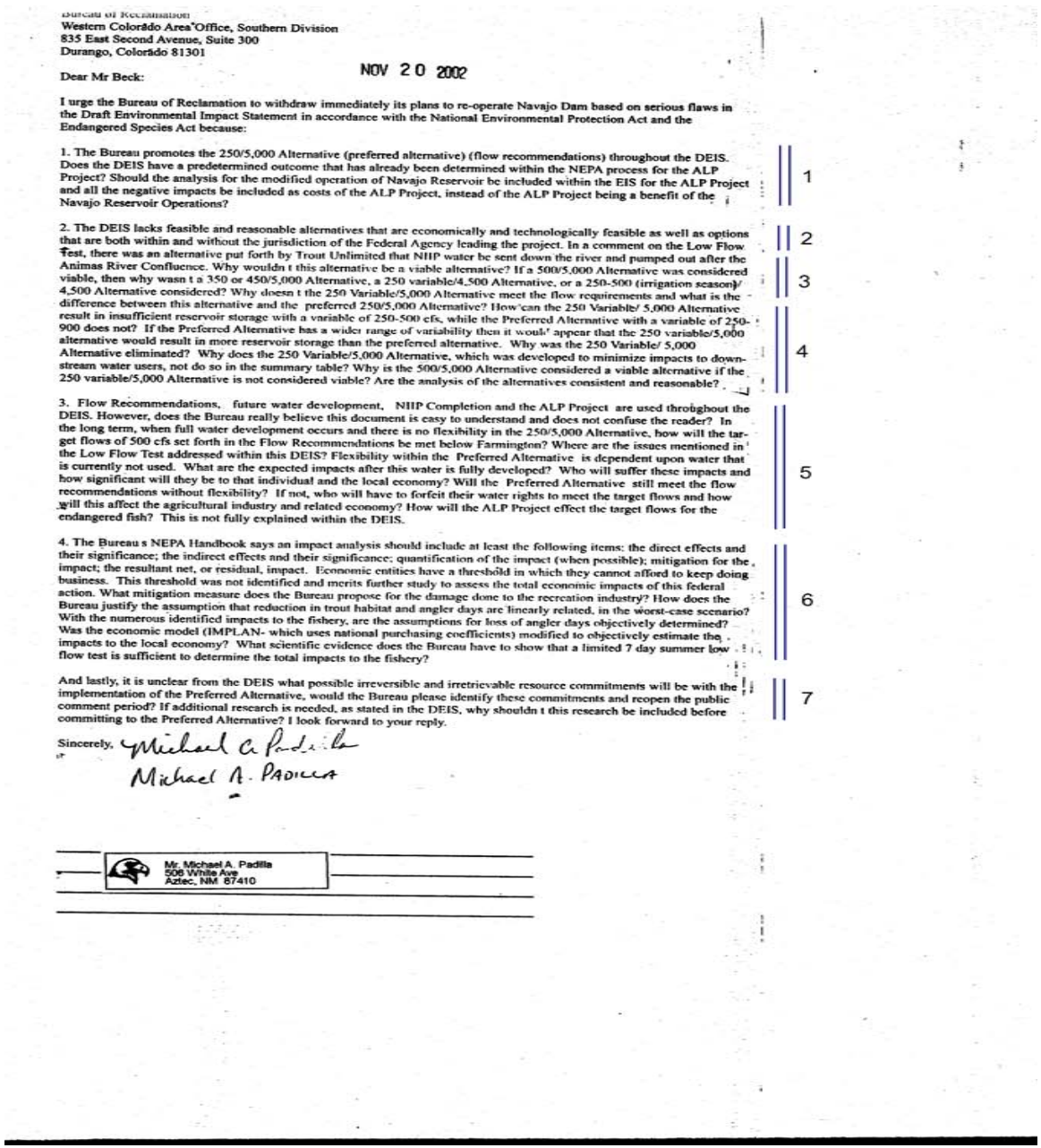
I have been lucky enough in my travels to get a chance to experience the beauty of this area and the wonderful fishing it has to offer. I fish this area with my sons and look forward to fishing it with my grandchildren. I believe that the low flows will impact this area so greatly that this will not be the case. My children may not be able to have the same experience in the future. I hope they do. The BOR should do the right thing and keep the flows at a 500 cfs minimum. 2

Sincerely

James R Duncan
4550 Shadow Dr.
Decatur, IL. 62526
JIMD@DMHHS>ORG

FLTYPE2-1 Please see the responses to General Comments 29, 30, 31, and 32.

FLTYPE2-2 Please see the responses to General Comments 3 and 16.



Bureau of Reclamation
Western Colorado Area Office, Southern Division
835 East Second Avenue, Suite 300
Durango, Colorado 81301

NOV 20 2002

Dear Mr Beck:

I urge the Bureau of Reclamation to withdraw immediately its plans to re-operate Navajo Dam based on serious flaws in the Draft Environmental Impact Statement in accordance with the National Environmental Protection Act and the Endangered Species Act because:

1. The Bureau promotes the 250/5,000 Alternative (preferred alternative) (flow recommendations) throughout the DEIS. Does the DEIS have a predetermined outcome that has already been determined within the NEPA process for the ALP Project? Should the analysis for the modified operation of Navajo Reservoir be included within the EIS for the ALP Project and all the negative impacts be included as costs of the ALP Project, instead of the ALP Project being a benefit of the Navajo Reservoir Operations? 1

2. The DEIS lacks feasible and reasonable alternatives that are economically and technologically feasible as well as options that are both within and without the jurisdiction of the Federal Agency leading the project. In a comment on the Low Flow Test, there was an alternative put forth by Trout Unlimited that NIIP water be sent down the river and pumped out after the Animas River Confluence. Why wouldn t this alternative be a viable alternative? If a 500/5,000 Alternative was considered viable, then why wasn t a 350 or 450/5,000 Alternative, a 250 variable/4,500 Alternative, or a 250-500 (irrigation season)/ 4,500 Alternative considered? Why doesn t the 250 Variable/5,000 Alternative meet the flow requirements and what is the difference between this alternative and the preferred 250/5,000 Alternative? How can the 250 Variable/ 5,000 Alternative result in insufficient reservoir storage with a variable of 250-500 cfs, while the Preferred Alternative with a variable of 250-900 does not? If the Preferred Alternative has a wider range of variability then it would appear that the 250 variable/5,000 alternative would result in more reservoir storage than the preferred alternative. Why was the 250 Variable/ 5,000 Alternative eliminated? Why does the 250 Variable/5,000 Alternative, which was developed to minimize impacts to down-stream water users, not do so in the summary table? Why is the 500/5,000 Alternative considered a viable alternative if the 250 variable/5,000 Alternative is not considered viable? Are the analysis of the alternatives consistent and reasonable? 2 3 4

3. Flow Recommendations, future water development, NIIP Completion and the ALP Project are used throughout the DEIS. However, does the Bureau really believe this document is easy to understand and does not confuse the reader? In the long term, when full water development occurs and there is no flexibility in the 250/5,000 Alternative, how will the target flows of 500 cfs set forth in the Flow Recommendations be met below Farmington? Where are the issues mentioned in the Low Flow Test addressed within this DEIS? Flexibility within the Preferred Alternative is dependent upon water that is currently not used. What are the expected impacts after this water is fully developed? Who will suffer these impacts and how significant will they be to that individual and the local economy? Will the Preferred Alternative still meet the flow recommendations without flexibility? If not, who will have to forfeit their water rights to meet the target flows and how will this affect the agricultural industry and related economy? How will the ALP Project effect the target flows for the endangered fish? This is not fully explained within the DEIS. 5

4. The Bureau s NEPA Handbook says an impact analysis should include at least the following items: the direct effects and their significance; the indirect effects and their significance; quantification of the impact (when possible); mitigation for the impact; the resultant net, or residual, impact. Economic entities have a threshold in which they cannot afford to keep doing business. This threshold was not identified and merits further study to assess the total economic impacts of this federal action. What mitigation measure does the Bureau propose for the damage done to the recreation industry? How does the Bureau justify the assumption that reduction in trout habitat and angler days are linearly related, in the worst-case scenario? With the numerous identified impacts to the fishery, are the assumptions for loss of angler days objectively determined? Was the economic model (IMPLAN- which uses national purchasing coefficients) modified to objectively estimate the impacts to the local economy? What scientific evidence does the Bureau have to show that a limited 7 day summer low flow test is sufficient to determine the total impacts to the fishery? 6

And lastly, it is unclear from the DEIS what possible irreversible and irretrievable resource commitments will be with the implementation of the Preferred Alternative, would the Bureau please identify these commitments and reopen the public comment period? If additional research is needed, as stated in the DEIS, why shouldn t this research be included before committing to the Preferred Alternative? I look forward to your reply. 7

Sincerely,

Michael A Padilla
Michael A. Padilla

Mr. Michael A. Padilla
508 White Ave
Aztec, NM 87410

FLTYPE3-1 Please see responses to General Comments 1 and 10.

FLTYPE3-2 Please see responses to General Comments 5 and 9.

FLTYPE3-3 Please see the response to General Comment 8.

FLTYPE3-4 Please see the responses to General Comments 3, 4, and 5.

FLTYPE3-5 The SJRBRIP and associated Flow Recommendations are discussed in Volume I (Chapter 1) and the Flow Recommendation executive summary can be found in Volume II of the EIS. For a detailed discription of the Flow Recommendations, please refer to the *Flow Recommendations for the San Juan River* (Holden, 1999). Also, please see responses to General Comments 11, 22, and 15.

FLTYPE3-6 Please see responses to General Comments 1, 2, 22, 28, 29, 30, and 31.

FLTYPE3-7 Please see the responses to General Comments 1d and 17.