



Nathan T. Fey  
Director  
Colorado River Stewardship Program  
1601 Longs Peak Ave.  
Longmont, Colorado 80501  
nathan@americanwhitewater.org

July 2, 2013

Greg Allington, Project Manager/Biologist

McMillen, LLC

1401 Shoreline Drive, Suite 100

Boise, ID 83702

RE: Comments on Proposed Green River Diversion Rehabilitation Project

Dear Mr. Allington,

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have nearly 7,000 individual members and over 100 club affiliates, representing over 80,000 whitewater paddlers and river enthusiasts from across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization whose members enjoy the recreational opportunities the Green River has to offer, American Whitewater has a strong interest in the Green River Diversion Structure and, therefore, strongly encourages NRCS to include downstream boat passage at the dam to improve public safety.

The Green River is a high-value recreational resource in the upper Colorado River basin, and provides unique multi-day rafting and kayaking opportunities popular with a wide range of recreational users – particularly families. Below Flaming Gorge Dam, no major storage impoundments have been constructed on the river, and compared to other rivers in the region, irrigation diversions are minor – allowing for nearly un-impeded navigation from Flaming Gorge to the Colorado River Confluence. The Green River Diversion structure is the most significant in-channel obstruction on the main segment of the Green River, and starves fish of high quality habitat, while also creating a life threatening re-circulating hydraulic that presents significant danger to recreational paddlers at higher flows.

While American Whitewater has no recorded information on fatal accidents caused by Tusher Canyon Diversion in our database<sup>1</sup>, we have been aware of numerous near-fatal incidents associated with the diversion structure and downstream hydraulic. Including downstream passage into the rehabilitation plan will eliminate the threat to public safety, while minimizing demands on emergency personnel. We ask that the NRCS and its project partners contact local law enforcement and search and rescue for more information on these non-fatal

<sup>1</sup> The American Whitewater Accident Database is a nation-wide collection and analysis of whitewater accidents and close calls. This database, while extensive, is not complete. A significant number of accidents are not reported to us. <http://www.americanwhitewater.org/content/Safety/view/>

incidents, and to incorporate safe passage into the final project proposal to eliminate these existing risks.

Thank you in advance for considering a range of improvements to the Green River Diversion Structure. American Whitewater applauds the efforts of NRCS and its partners to eliminate a physical barrier to fish seeking to migrate through the site, while also creating safe passage for rafters, kayakers, and canoeists enjoying the outstandingly remarkable recreational opportunities the Green River provides. It is critical that the project meet the needs of local irrigators, while minimizing threats to public safety. Please contact me if you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan T. Fey".

Nathan T. Fey  
Colorado River Stewardship Director  
American Whitewater