



Whitewater Adventure Outfitters  
50905 Hwy 50 West  
Cañon City, Colorado 81212  
1-800-530-8212 (719) 275-5344  
kathy@waorrafting.com

11-21-2008

# FAX COVER SHEET

**TO: Bureau of Reclamation**

**FROM: AROA**

**ATTN: Kara Lamb**

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November 21, 2008

U.S. Bureau of Reclamation  
Eastern Colorado Area Office  
11056 W. County Road 18E  
Loveland, Colorado 80537-9711  
Attn: Kara Lamb

**Re: Southern Delivery System Supplemental Information Report**

Dear Ms. Lamb:

These comments to the Supplemental Information Report ("SIR") for the Southern Delivery System are submitted on behalf of the Arkansas River Outfitters Association ("AROA"). AROA is a trade organization that represents more than 30 rafting and fishing outfitters in the Upper Arkansas Valley. Our membership is representative of over 80% of all commercial user days on the Arkansas River. The primary focus of AROA is to work in cooperation with water right owners and water providers to protect and sustain flows that are conducive to a healthy local tourism economy and the future operation of rafting and fishing outfitters in the Upper Arkansas Valley.

The Upper Arkansas Voluntary Flow Management Program ("UAVFMP") is a year-round program designed to provide an annual flow regime that helps maintain the brown trout fishery, meet the demand for boating recreation and support the region's tourism industry. AROA is concerned about the increasing pressure to develop new water resources in the Upper Arkansas Valley, which puts recreational needs at odds with municipal and agricultural needs. The Upper Arkansas River is an over-allocated system that is already strained. Additional long-term exchange contracts, such as those contemplated by the Southern Delivery System, threaten recreational flows over the course of the contracts. While AROA respects growing municipal needs, we are extremely concerned by the potential for the loss of the very things that make Colorado such a great place to live and visit. For these reasons, AROA intends to continue to request that the potential for the Southern Delivery System to impact the UAVFMP and the target flows designed to protect the vital rafting, fishing and tourism industries in the Upper Arkansas Valley be accurately and fairly evaluated.

On May 13, 2008, AROA submitted comments to the Draft Environmental Impact Statement for the Southern Delivery System. AROA requests that the Bureau of Reclamation consider those comments in its review of the SIR to the extent that they are applicable. AROA also intends to request as part of the final decision-making process that the Bureau of Reclamation require that all Project Participants agree to fully support the UAVFMP to protect stream flows in the Upper Arkansas River. As part of a commitment to support the UAVFMP, Project Proponents should agree to operate their

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water diversions and water exchanges in such a way as to avoid depleting Upper Arkansas River flows at times when the Bureau is supplementing those flows through a release of storage water under the UAVFMP.

Thank you for this opportunity to provide comments to the Southern Delivery System SIR. Please contact me with any questions or concerns or if AROA can, in any way, be of help.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Keenan', with a horizontal line extending to the right.

Tony Keenan  
Water Resources Chairman  
Arkansas River Outfitters Association  
(719) 275-5344