



Page 2
Kent Jones

In addition, a Colorado pikeminnow spawning area is located a few miles upstream from the withdrawal site (Two Fords Rapid), therefore the withdrawal site would be within a major larval drift area for the lower Green River. Although the intake would be designed to reduce intake of larvae, it would most likely still reduce the number of larvae making it to nursery habitats below the site.

In addition, ponds associated with the project have the potential to harbor exotic fish species, such as sunfishes and bullheads, that could escape into the river. These species are known to prey on native fishes. Ponds associated with a power plant in the Four Corners area recently allowed the introduction of gizzard shad to the Colorado River system, and they are now very common in Lake Powell and in the Green River all the way up to the Vernal area. This threat was not mentioned in Dr. Hardy's testimony.

In conclusion, there are a number of important points related to the Blue Castle Project that Dr. Hardy failed to mention that have the potential to impact the endangered fish. I would hope the state takes a closer look at those potential impacts in considering this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul B. Holden', is written over a horizontal line.

Paul B. Holden, PhD
Senior Fisheries Biologist

Cc: Eric Spreng

RECEIVED
FEB 22 2010
WATER RIGHTS
SALT LAKE