



## *Casper Boat Club*

P. O. BOX 2123  
CASPER, WYOMING 82602

September 30, 2007

Bureau of Reclamation  
Denver Federal Center  
P.O. Box 25007  
Denver, CO 80225  
Attention: Richard Rizzi  
Mail Code: 84-53000

Reference Number 1006-AA51

Dear Mr. Rizzi:

Please accept the following as comments from the Casper Boat Club regarding the Notice of Proposed rulemaking; 43 CFR Part 429 Use of Bureau of Reclamation Land, Facilities, and Waterbodies; Proposed Rule.

The membership of the Casper Boat Club strongly opposes these proposed rule changes for reason outlined below and we strongly urge the Bureau to not enact these changes.

We are specifically concerned with the impact of these changes to users of Alcova Lake near Casper, Wyoming and, more specifically, the negative impact these changes could have on the Casper Boat Club. Presently, the Casper Boat Club as well as the Alcova Marina, Casper Water Ski Club and many cabin and trailer owners lease land at Alcova Lake from the County of Natrona which leases the land from the Bureau of Reclamation. The county's lease with the Bureau of Reclamation is set to expire in 2016 and, according to the proposed changes there is a high probability that the lease will not be renewed leaving the boat club, ski club, marina and cabin and trailer owners without leases beyond 2016. We believe that this could have large negative impacts to the users and businesses that rely on Alcova Lake for recreation and revenue.

Here are some facts about the club for your consideration. The Casper Boat Club has been in existence since the late 1930's. The Casper Boat Club accepts all applicants for membership and does not discriminate in any way. As a non profit club any money the club takes in which is in excess of expenses is invested back in the club grounds and facilities. The club has worked hard on erosion control on the leased property which is a benefit to all users of Alcova Lake and meets or exceeds all regulatory requirements which helps to ensure the safety of lake users and maintain the environment of the area. Many of our events are open to non members such as the annual poker run which contributes generously to charity in Casper. This year alone the poker run raised and donated \$10,000 for Jason's Friends Foundation of Casper, an organization that assists families with children who have cancer. We consider our club to be a good tenant and steward of the property we lease adding value not only to the club membership but the community as a whole.

Our concerns with the proposed changes in the Bureau of Reclamation rules are many, of which we highlight for you below. This list is by no means exhaustive, but shows the potential impact of these rule changes.

**Economic Impact** – The failure to renew the lease beyond 2016 would result in the following adverse economic impact:

- The Casper Boat Club pays \$15,500 per year in lease payments to the county which goes into direct support of the park at Alcova Lake which would be lost. (The Alcova Marina, Casper Water Ski Club, cabin owners and trailer owners also pay lease payments that support the park.
- The Casper Boat Club provides seasonal employment (as does the marina) which would be lost.
- Many businesses derive revenue directly from the leaseholders at Alcova Lake which would disappear. Some examples of these businesses are: waste removal companies; carpenters, electricians and other contractors; food suppliers and fuel suppliers.
- Many businesses derive revenue indirectly from Alcova Lake activities such as boating and recreational vehicle sales and services, gasoline sales and sporting goods suppliers all of which could be impacted.
- Services provided by the Casper Boat Club, Casper Water Ski Club and Alcova Marina are vital in supporting tourism to the area. Further, they are a valuable attraction for those looking to relocate to Wyoming. Loss of these facilities and services could negatively impact tourism as well as recruitment to our area.

**Impact on County and State Infrastructure** – The failure to renew the lease beyond 2016 would result in the following impact:

- The Casper Boat Club provides 243 boat slip rentals to its members which allow these boats to be kept at the lake the entire season. The marina, ski club and cabin owners also have seasonal boat docks. With the loss of the lease we believe some boat owners would sell their boats and no longer use the lake. However, a part of these boat owners would be forced to transport their boats to and from the lake each weekend and holiday further congesting what many consider an already overused highway between Casper and Alcova. This also raises safety concerns with the increased traffic.
- The loss of the loading ramps at the boat club, marina and ski club, the loss of camping and RV facilities at the clubs and marina as well as the loss of the trailers and cabins will force more users into the public loading ramps and camping areas causing further crowding and over use of these areas and safety issues.

**Other Impact** – We further believe that the loss of the lease would result in a reduction in use of the Alcova area which, in itself, would be a tragedy. Having this beautiful resource available with the many services provided by the current leaseholders is a great asset to our state which should be fully utilized and not wasted.

Finally, there is one part of the proposed rule changes that we find very concerning. In paragraph 429.32(b) the proposal states that leases may be renewed in cases which are rare exceptions. However, what a rare exception constitutes is not defined and we feel this allows officials within the Bureau of Reclamation too much discretion in deciding what leases may be renewed. At the very least there should be some constraints on these officials to guide them in determining what a rare exception is and at best this whole proposal should be abandoned as it is not in the best interest of our state.

In summary we believe that enacting the proposed changes would have serious negative consequences for not only our club, but the other leaseholders and all users of the Alcova Lake park. It is our opinion that these changes not be adopted and that the Bureau of Reclamation renew existing leases as

they expire to further the positives that derive from having these leases in place. Thank you for your time and consideration in this matter and if we can provide further information to you, please contact us at your convenience.

Sincerely,

The Casper Boat Club Board of Directors:



Lynn Burgess, Commodore



Don Claunch, Vice Commodore



Sonya Gruner, Secretary



Tom Brauer, Treasurer



David Simonson, Past Commodore



Jim Coffman



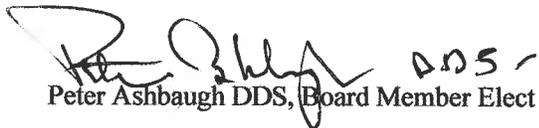
Kim Harvey



Nick Hopkins



Brian Stober



Peter Ashbaugh DDS, Board Member Elect



Lee Burgess, Board Member Elect