

Gunnison County Board of County Commissioners

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December 20, 2022

Reclamation 2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region,
125 South State Street, Suite 8100
Salt Lake City, Utah 84138

Reclamation 2007 Interim Guidelines SEIS Project Manager:

The Gunnison Board of County Commissioners would like to submit the following comments as the Bureau of Reclamation prepares a Supplemental Environmental Impact that may amend a December 2007 Record of Decision entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead.

As historic drought and warming climate conditions continue, Upper Basin reservoirs will remain an important piece of the water infrastructure across the Colorado River Basin. At the same time, we would like to urge the Bureau of Reclamation to avoid disproportionate impacts to Upper Basin reservoirs whenever feasible.

Gunnison County is home to Blue Mesa Reservoir, the largest reservoir in the state of Colorado and one of the Upper Basin reservoirs that sent emergency releases through early October 2021 to mitigate declining water levels in Lake Powell and preserve hydropower capacity at Glen Canyon Dam. At the time the releases were ordered, the water level at Blue Mesa was at 41% capacity. As of November 2022, Blue Mesa was only 32% full versus 69% at Flaming Gorge Reservoir and 51% at Navajo Reservoir. Lower reservoir capacity levels lead to increased water temperatures and can establish favorable conditions for blue-green algae and toxic blooms that negatively impact water quality and recreation opportunities. Should further emergency releases to Lake Powell become necessary, we hope the Bureau will consider disproportionate impacts across Upper Basin reservoirs may be mitigated or avoided.

We also want to acknowledge the disproportionate burden of water conservation efforts as a factor for consideration. As Charles Cullom has stated in his letter to the Bureau dated July 18, 2022, we echo the point that Upper Division States of Colorado, New Mexico, Utah, and Wyoming have been proactive in water conservation efforts to manage chronic water shortages, dry hydrology and depleted water storage options. While we affirm the importance of ongoing collaboration to support the needs of the Upper and Lower Basins, austerity measures already taken by Upper Division states must be accounted for in any system conservation strategy contemplated by the Bureau.

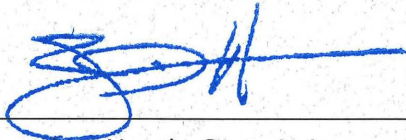
Finally, as a headwaters community to the Colorado River, we also urge the Bureau to consider the part water infrastructure plays in wildfire resiliency among its analytical criteria for the supplemental EIS.

Protecting wet meadow conservation programs, flooding irrigation practices, instream flow programs, and other water infrastructure projects create natural firebreaks in the landscape when wildfire does occur, and they mitigate fire severity and subsequent water quality impacts in the aftermath of fire. Recent federal spending packages are investing millions of dollars into forest health and wildfire resilience projects, but those benefits will be diminished if impacts to water infrastructure and wildfire resilience at the watershed scale are not considered in system conservation plans across the Colorado River Basin.

We appreciate your consideration on this critical issue to establish long-term solutions to ongoing drought across the Colorado River Basin.

Sincerely,

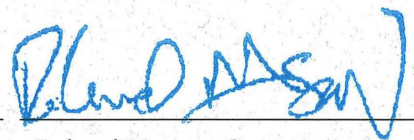
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Jonathan Houck, Commissioner

A blue ink handwritten signature, appearing to be 'Liz Smith', written over a horizontal line.

Liz Smith, Commissioner

A blue ink handwritten signature, appearing to be 'Roland Mason', written over a horizontal line.

Roland Mason, Commissioner