

March 2, 2026



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**Participating Organizations**

Utah Department of Natural Resources

Central Utah Water Conservancy District

Utah Reclamation Mitigation and  
Conservation Commission

Provo River Water Users Association

Provo Reservoir Water Users Company

Outdoor Interest Group

Utah Division of Water Quality

Bureau of Reclamation  
Attention: BCOO-1000  
P.O. Box 61470  
Boulder City, NV 89006

VIA ELECTRONIC MAIL  
[crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Subject: Draft Environmental Impact Statement Colorado River  
Post 2026 Operations - Comments

Dear Commissioner Cameron,

The June Sucker Recovery Implementation Program (JSRIP) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Colorado River Post-2026 Operations. This letter is in addition to any letters sent by partner agencies of the JSRIP.

The JSRIP is a multi-agency program with the goal of recovering the June sucker which was Federally listed as endangered under the Endangered Species Act (ESA) in 1986 and successfully downlisted to threatened status in 2021 (one of six fish species to ever accomplish this). When the June sucker was listed in 1986, the US Fish and Wildlife Service (USFWS) attributed part of the decline of June suckers to habitat alteration through dewatering and degrading water quality. In the 2021 downlisting document, the USFWS identified the need for spring and summer flows in the Provo River to the designated critical habitat in the lower 7.8 kilometers (4.9 miles) of the Provo River as one of the criteria that was needed to be addressed or met to achieve downlisting/delisting.

This comment letter will focus on two recovery criteria discussed in the downlisting decision by USFWS.

***Acquisition and Management of Water Flows***

“The first downlisting criterion requires that Provo River flows essential for June sucker spawning and recruitment are protected.” (USFWS 2019). Over the past 20 years the Department of the Interior has spent over \$270 million to provide June sucker spawning and brood rearing flows on the Provo River and Hobble Creek. Much of this water was acquired through projects that provided efficiency and conservation of Utah’s portion of the Colorado River water under section 207 of the Central Utah Project Completion Act (CUPCA). The Utah Reclamation Mitigation and Conservation Commission has also expended funds to acquire and protect instream flows in the lower

Provo River. These flows were key to meeting the criteria identified by the USFWS and helped to achieve downlisting.

The USFWS identified threats to the recovery of the June sucker in 1986 and most recently in 2021 stating:

“The June sucker faces threats primarily from degraded habitat and water quality, water availability, predation from nonnative species, and urbanization. Furthermore, existing regulatory mechanisms do not adequately address these threats. The June sucker also faces a future threat of climate change, which may exacerbate other existing threats. These factors may act cumulatively on the species. For example, urbanization can result in increased pressure on existing water resources as well as degraded water quality, which, when combined with rising temperatures and decreased rainfall, can result in less available water, increased water temperatures, and decreased habitat quality. These factors can cause reduced availability of food for the June sucker, decreased reproductive success, and increased mortality.”

The JSRIP is concerned that alterations that could reduce the water supply and decrease the availability of water in the future for the June sucker would have negative impacts on the recovery of the species. JSRIP is also concerned about possible increases to the timing, duration or intensity of droughts which would be exacerbated by a depletion in the water supplies available to the Provo River which have supported June sucker recovery.

### ***Habitat Restoration***

“The second downlisting criterion for June sucker requires that spawning and brood-rearing habitat in the Provo River and Utah Lake be enhanced or established to provide for the continued existence of all life stages (USFWS 1999).” Over the past 20 years the JSRIP and its partners have invested over \$50 million in habitat improvements and modifications to help recover the June sucker. The largest and most prominent of these projects is the Provo River Delta Restoration Project (PRDRP). The PRDRP was specifically designed to provide spawning and brood-rearing habitat which provides the missing environment for the recovery of the species and provides an area for recruitment. Diminishing the water supply throughout the year would have negative impacts on the ecosystem within the PRDRP that is a critical piece of the recovery of the species.

The JSRIP requests that the final environmental impact statement incorporates transparent risk assessments and implements management strategies capable of avoiding negative impacts to the continued success of the recovery of the June sucker or generating negative impacts to the recovery criteria described above and outlined within the USFWS 2021 downlisting document.

Should there be any questions, please contact me, Kevin Bunnell, at (435) 868-1799 or [Kevinbunnell@utah.gov](mailto:Kevinbunnell@utah.gov), or Russ Franklin at (385) 230-5832 or [Russ@cuwcd.gov](mailto:Russ@cuwcd.gov).

Sincerely,

  
Kevin Bunne (Mar 2, 2026 14:45:34 MST)

Kevin Bunne  
June Sucker Recovery Program Director