

July 7, 2023

Bureau of Reclamation  
Upper Colorado River Basin System Conservation and Efficiency Program  
UCBEfficiency@usbr.gov.

RE: Joint comments on Bureau of Reclamation's Request for Input for the Upper Colorado River System Conservation and System Efficiency Program.

The undersigned organizations appreciate the opportunity to engage with the Bureau of Reclamation (Reclamation) regarding the "Request for Input for the Upper Colorado River Basin System Conservation and Efficiency Program" (UB Program or Program). The UB Program aims to implement funding from the Inflation Reduction Act (IRA) to help mitigate the effects of drought in the Upper Colorado River Basin (UB). In order to make IRA funding accessible to communities throughout the UB, including in the San Juan Basin in New Mexico, we strongly support making sufficient funds available to support the full lifecycle of suitable projects including building internal capacity within eligible entities and supporting external capacity of partners, such as nonprofits, academics and others, in further cultivating and developing good projects for the UB Program.

Located in Colorado, New Mexico, Arizona, and Utah, the San Juan is an important tributary of the Colorado River Basin. Rising in the mountains of Colorado, the San Juan provides water for over 4 million people, significant agricultural production, recreational opportunities such as fly fishing along the Animas River, and sustains endangered native fish species. The headwaters of San Juan are also an important source of drinking water for several major urban centers including Albuquerque. Well, over 50 percent of the San Juan watershed is tribal land, with the San Juan and its tributaries providing a critical source of water for the Ute Mountain Ute Tribe, Southern Ute Tribe, the Jicarilla Apache Nation, and Navajo Nation. Surface water provides for 99% of the water used in the San Juan basin in New Mexico. Because the region relies primarily on surface water, it is highly vulnerable to drought.

The San Juan Basin presents an opportunity to utilize funding through the UB Program to increase the pace and scale of drought mitigation strategies ranging from irrigation system modernization to restoring wetland and riparian ecosystems to enhance resilience to climate change. There are multiple groups active in the region that are well poised to implement water conservation and efficiency efforts and much-needed habitat restoration work in the San Juan Basin. For example, the Colorado Ag Water Alliance is working with producers in southwestern Colorado to evaluate the water conservation and socio-economic benefits of alternative crops and forage production techniques that utilize less water. The Animas Watershed Partnership is working near Aztec, New Mexico to rehabilitate an aging diversion structure in order to improve water delivery, protect native fish populations, and improve river channel stability. Amigos Bravos, through their broader Wetland Jewels program, are mapping wetland ecosystems in the San Juan basin in order to prioritize restoration opportunities that can help enhance the drought resilience benefits of wetland habitats. IRA funding could also supplement state resources such as New Mexico's Strategic Water Reserve Program, which is active in the San Juan, and supports the voluntary acquisition or lease of water to support interstate stream compact compliance and benefit threatened and endangered species. Colorado Parks and Wildlife and New Mexico Fish and Game are also active in the San Juan Basin and working to restore and

conserve native trout in headwater streams. These restoration activities help enhance drought resilience by restoring riparian and wetland natural water storage and water quality enhancement processes.

Yet, deployment of IRA funds within the San Juan Basin will be largely benefitted by flexible funding arrangements and UB program administration. The San Juan Basin is largely rural and lower-income compared with other UB regions. As such, many partners throughout the region, including entities that would be eligible for UB program funds (e.g., Tribes, regional governments) have extremely limited local capacity to apply for and administer federal grants, as well as limited access to practitioners to do the on-the-ground work. There is also limited access to resources for project development, including project planning, design, and engineering.

Given these challenges, we urge Reclamation to work with partners in the San Juan Basin and similarly situated UB watersheds to design the UB program in a way that's accessible to partners in these historically underserved regions. We recommend the UB program provide flexible cost-share requirements or exemptions/waivers for eligible entities in more rural and underserved regions. We recommend that the UB program provide financial and technical support for the full project life cycle, including design and engineering. Many partners have highlighted that a lack of financial support for project development is a significant hurdle to increasing the pace and scale of project implementation. Ensuring these activities are eligible, or setting a portion of funding to invest in project development, can help minimize this common barrier to accessing federal resources.

State and local governments, Tribes, Pueblos, and Nations will be critical to getting UB programming funds to the ground. However, many of these stakeholders lack the capacity to administer and implement significant infusions of funding. We recommend that UB program funding be available to build regional and local capacity to administer and direct funds to the ground. This should include allowing IRA funds to expand operational/programmatic capacity within eligible entities in the region, including support for technical assistance that can help stakeholders develop and submit project proposals for funding. These types of resources are particularly beneficial for critical stakeholders such as Tribes, states, local governments, water users, and watershed organizations in rural regions that could be critical in helping deliver these funds to scale projects on the ground but lack the capacity and support for project development. Overall, as we've seen with other IRA funding opportunities, investing in the capacity to administer and deliver funds goes a long way to increasing the pace and scale of projects that provide durable results for the basin.

We commend Reclamation for the significant strides already made with IRA funding and its ongoing commitment to securing a sustainable water future for the CRB. We look forward to continued engagement and collaboration as we address the challenges facing the Basin and leverage the opportunities provided by Congress's historic investment.

Sincerely,

Tricia Snyder, Senior Water Policy Analyst, New Mexico Wild

Elle Benson, Southwestern Water Program Coordinator, Theodore Roosevelt Conservation Partnership

Anjali Bean, Healthy Rivers Senior Policy Analyst, Western Resource Advocates

Steven Fry, Policy and Project Specialist, Amigos Bravos

Claire Catlett, Upper Rio Grande Engagement Manager, Trout Unlimited

cc: Ms. Camille Calimlim Touton  
Mr. David Palumbo  
Mr. Mike Brain  
Mr. Bob Wolff  
Mr. Wayne Pullan  
Mr. Mike Hamman  
Ms. Hannah Riseley-White  
Mr. Ali Effati