



Colorado River District

75 Years
Protecting Western Colorado Water



January 16, 2012

Karl Mendonca, Acting Field Manager
U.S. Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, CO 81652

Via Us. Mail and email
kmendonc@blm.gov

Dave Stout, Field Manager
U.S. Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

Via Us. Mail and email
dstout@blm.gov

Leigh D. Espy, Deputy State Director
U.S. Bureau of Land Management
Resources and Fire
2850 Young field Street
Lakewood, CO 80215

Via Us. Mail and email
lespy@blm.gov

Scott Fitzwilliams, Forest Supervisor
U.S. Department of Agriculture
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81601

Via U.S. Mail and email
sfitzwilliams@fs.fed.us

Re: Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS) for U.S. Bureau of Land Management (BLM) Kremmling and Colorado River Valley Field Offices and U.S. Forest Service (USFS) White River National Forest

Dear Mr. Mendonca, Mr. Stout, Ms. Espy, and Mr. Fitzwilliams:

The Colorado River Water Conservation District (River District) is a political subdivision of the State of Colorado created by state statute in 1937 "...to safeguard for Colorado all waters to which the state of Colorado is equitably entitled under the Colorado river compact." Colo. Rev. Stat. § 37-46-101 (2011). The River District encompasses all or part of 15 counties within Colorado lying on the West Slope of the Continental Divide. The BLM's Colorado River Valley and Kremmling Field Offices and the White River National Forest cover areas entirely within the boundaries of the River District.

The River District is granted broad powers to conduct such actions as are necessary to promote the growth and development of the District and the welfare of the District's inhabitants. Among the River District's specific powers is the power to cooperate with federal agencies in the development of water resources. C.R.S. § 37-46-101 and 107 (2011). I am writing now to submit the River District's comments on the Draft Resource Management Plan/Draft Environmental Impact Statement for the U.S. Bureau of Land Management (BLM) Kremmling and Colorado River Valley Field Offices and the U.S. Forest Service (USFS) White River National Forest.

The River District is an active member of the Upper Colorado River Wild and Scenic Stakeholder Group, and fully supports the January 10, 2012, comment letter sent to each of you by Rob Buirgy on behalf of the Stakeholder Group. As outlined in the January 10th letter, the Stakeholder Group obviously supports the adoption by the BLM and Forest Service of Preferred Alternative B2 regarding Colorado River segments 4 through 7. As you know, the members of the Stakeholder Group have differing views on whether Segments 4 through 7 should be found suitable for designation under the Wild and Scenic Rivers Act. Similarly, the issue of suitability is somewhat controversial within the River District and amongst its many varied constituents. The River District supports Alternative B2 because it would allow interested stakeholders to work cooperatively with the federal government to protect the outstandingly remarkable values in river Segments 4 through 7 without the discontent that might arise if Alternative B1 (suitability) is adopted. The River District therefore encourages the BLM and USFS to adopt preferred Alternative B2 as the best opportunity for protection of river Segments 4 through 7.

On matters not related to the river Segments 4 through 7, the River District requests that the Kremmling Field Office conduct a separate and comprehensive analysis of the potential impacts of oil and gas leasing, particularly in areas adjacent to and upstream of Wolford Mountain Reservoir. The River District owns and operates Wolford Mountain Reservoir. The reservoir serves as a key source of water for replacement needs for the River District's constituents as well as for Denver Water, the River District's partner at Wolford. In addition, the reservoir is an important recreational amenity for camping, fishing, and boating. Surface disturbances associated with oil and gas development could impact water quality at Wolford Mountain Reservoir by increasing surface runoff, erosion, sedimentation, and an increase in salt loading. Additionally, any oil and gas operations that produce tributary ground water in the vicinity could injure the vested water rights of the River District and its constituents. The River District also is concerned that any accidental release of chemicals and petroleum products associated with oil and gas production could have long lasting and detrimental impacts on water quality at the reservoir and for the reservoir's downstream beneficiaries.

The River District appreciates the opportunity to comment on the BLM/USFS Resource Management Plans.

Yours very truly,



Peter C. Fleming
General Counsel

cc via e-mail only:

Rob Buirgy, Project Manager, Upper Colorado River W&S Stakeholder Group
Roy Smith, U.S. Bureau of Land Management
Kay Hopkins, U.S. Department of Agriculture, White River National Forest
R. Eric Kuhn, General Manager, CRWCD