



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7076

IN REPLY REFER TO:

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Don Glaser
Western Water Policy Review Advisory Commission
P.O. Box 25007, D-5001
Denver, Colorado 80225-0007

Dear Mr. Glaser:

The enclosed are the Bureau of Land Management Colorado's comments on the Colorado River Basin study conducted by Dale Pontius.

If you have any questions about these comments, you may contact me at (303) 239-3940.

Sincerely,

Roy E. Smith
Water Rights and Instream Flow Coordinator

Enclosure

Bureau of Land Management Colorado

Comments on the Colorado River Basin Study
Conducted by Dale Pontius.

Page 57 -- The text on the "RIPRAP" should note that the program is not currently meeting the standard of "sufficient progress," as defined by the U.S. Fish & Wildlife Service. The director of the RIPRAP program has issued a list of accomplishments and specific dates that must be met to meet "sufficient progress" criteria. If these deadlines are not met, it appears that the program may no longer be considered as a "reasonable and prudent alternative" to new water depletions. Accordingly, the current status of the program should be verified with its director and incorporated into the report.

Page 84 -- It is mistaken to characterize the negotiations on the Dolores River as a "consensus" process that has "solved" a water resource problem. Rather, it should be labeled as a productive "negotiation" process that has "partially addressed" a major resource problem, with the prospect of even greater results. Labeling the process as a "consensus" may be incorrect because some water users were totally opposed to additional water acquisition by Reclamation, but agreed to let the acquisition go forward to keep a working relationship in place with other stakeholders. In addition, some of the agencies and river users who have participated in the negotiation process are still far from totally satisfied with how the river is managed. However, these agencies and users have agreed to accept the results of the negotiations because it was a far better alternative than the status quo, and because future negotiations promise more results. More progress is needed because the "biological team" which was designated as a part of the flow management negotiations recommended a pool of 38,700 acre feet as a minimum to protect and sustain fisheries. Therefore, even though negotiations have obtained a temporary pool of 36,500 acre feet, this is still below the minimum need to maintain a healthy river.