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Douglas County Commissioner's Office
Commissioner Abe Laydon
Commissioner George Teal
Commissioner Lora Thomas
100 3rd Street
Castle Rock, CO 80104

February 9, 2022

RE: Opposition to Renewable Water Resources Export Proposal

Dear Douglas County Commissioners,

On behalf of Audubon Rockies, we write to urge you not to move forward with Renewable Water Resources' (RWR) request to utilize American Rescue Plan Act (ARPA) stimulus funds to export water from the northern San Luis Valley (SLV). The SLV is a suite of ecosystems and landscapes found nowhere else and is home to three national wildlife refuges, Great Sand Dunes National Park, and two Important Bird Areas. The RWR proposal would significantly impact critical habitat for migrating and breeding waterfowl and shorebirds and migration corridor along the Rio Grande for migrating passerines. The RWR water export proposal puts the SLV economy, culture, environments, and critical and distinct bird habitats at risk.

The RWR proposal would require the dry-up of 20,000 irrigated acres in the Valley to pump 7.17 billion gallons of water annually to Douglas County. Agricultural "buy and dry" would negatively impact the farmers, communities, and bird species such as Sandhill Cranes, for which the SLV is known. Sandhill Cranes are an iconic species of the SLV. The annual crane festival event brings \$3.5 million into SLV communities over three weeks every March. Over 20,000 Sandhill Cranes and a few thousand Lesser Sandhills spend part of their spring and fall each year in this Valley. Nearly the entire population of Rocky Mountain Sandhills bottleneck in the SLV during their migration. While in the SLV, cranes build up energy by consuming waste grains in agricultural fields and aquatic invertebrates in wetlands.

Due to the unique location, environments, and interconnectivity between surface and groundwater, over 300 bird species can be found in the SLV. For example, the Valley contains several heronries (exceeding 200 pairs) that produce White-faced Ibis, Snowy and Cattle Egrets, and Black-crowned Night Heron. Two [Important Bird Areas \(IBA\)](#), the [Alamosa and Monte Vista National Wildlife Refuge Complex](#) and the [Rio Grande and Home Lake State Wildlife Areas](#), are State IBAs found in the SLV. IBAs are identified using robust, standardized criteria. Each proposed site undergoes a rigorous review process by a committee of ornithological and conservation experts that consider scientifically defensible data-driven evaluations of bird populations and habitats. Areas are further evaluated on a larger geographic scale, considering bird populations and conservation concerns. All of the IBA's in Colorado are monitored closely with the help of state parks, conservation organizations, Audubon volunteers, avid birders, and the general public interested in conserving these precious areas. Audubon represents more than 40,600 members in Colorado, and 1.8 million nationally.

The proposed RWR project would impact birds and other wildlife habitats on multiple fronts. Receiving less than 8 inches of precipitation each year, the SLV is one of the driest regions in the state of Colorado. In the past two decades, drought, reduced precipitation, and high rates of ground and surface water withdrawals have

threatened some of the Valley's important wetland and riparian areas. There is no renewable water in the SLV to export. The SLV aquifers are over-appropriated and climatic trends point to less available water. Removing water from the aquifers, as stated in the RWR proposal, could negatively affect aquatic ecosystems key to the region. Examples: the entire well field would be placed near the Baca National Wildlife Refuge, potentially impacting the wetland and aquatic ecosystems supporting migratory birds' breeding and feeding grounds. Pumping could also affect the unique hydrology of Great Sand Dunes National Park, home to over 250 bird species and more than 500,000 annual visitors.

The RWR proposal is out of alignment with the Colorado Water Plan – a framework for state water planning, projects, and policy. The Water Plan condemns the practice of agricultural "buy and dry" due to demonstrated socio-economic and environmental impacts in rural communities. Also, the Water Plan includes measures around new transbasin projects and environmental resiliency under the conceptual framework. The conceptual framework states "a path forward that considers the option of developing a new transmountain diversion and addresses the concerns of roundtables, stakeholders, and environmental groups. The conceptual framework presents seven principles to guide future negotiations between proponents of a new transmountain diversion, if it were to be built, and the communities it would affect." The RWR proposal fails on both accounts to adequately address SLV socio-economic and environmental needs.

The RWR proposal also seems questionable for eligibility to access Coronavirus State and Local Fiscal Recovery Funds, a part of the American Rescue Plan. These Recovery Funds may be used for drinking water projects to support population growth; however, the proposed water source must be "sustainable over its estimated useful life," be cost-effective, and consider available alternatives. The RWR proposal falls short by utilizing an unsustainable water source at a \$2 billion cost, with costs likely to exceed due to significant impediments and litigation.

In total, the RWR proposal presents a likely expensive, unpopular, and risky approach to meeting the growing water needs of Douglas County. Audubon recognizes that Douglas County depends on an unsustainable groundwater resource and is growing. We encourage Douglas County to utilize Coronavirus State and Local Fiscal Recovery Funds to apply broad use of water conservation, efficiency, water recycling, and effective land-use planning before pursuing a project that would have significant impacts on San Luis Valley communities, economies, birds, and other wildlife, and aquatic ecosystems.

Sincerely,



Alison Holloran
Audubon Rockies, Executive Director
VP National Audubon Society



Abby Burk
Western Rivers Regional Program Manager
Audubon Rockies