

Cary Aloia
Chair, San Luis Valley Wetland Focus Area Committee

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Douglas County Commissioners
100 Third Street
Castle Rock, CO 80104

RE: Reject Renewable Water Resources proposal for COVID relief funds to export water from the San Luis Valley

Dear Douglas County Commissioners:

As Chairwoman for the San Luis Valley Wetland Focus Area Committee (FAC), I appreciate the opportunity to provide our committee's collective perspective as well as wetland science and factual information in the hope that you will reject the proposal on water export from the San Luis Valley (SLV) by Renewable Water Resources (RWR) to Douglas County.

The FAC, created in 1997, brings together members from many sectors of the SLV community including state and federal land, water and wildlife agencies, non-profits, water and soil conservancy districts, private landowners, agricultural producers, educational institutions, and a wide range of other entities involved in the conservation, restoration, and enhancement of the riparian and wetland resources in the SLV. Water is the key resource connecting the health of the SLV's agriculture, tourism, community vitality, economy, and environment. RWR's statements are misleading and false regarding capacity of the confined aquifer, that the money injected into the SLV from RWR will help the community thrive, that the project will comply with all water rules, and that there is widespread community support for their export plan.

In this dry landscape, water is the key to sustaining both agriculture and the internationally important wetland resources for wildlife. The SLV has been in a drought for over 20 years, severely limiting annual water availability. Groundwater withdrawals from the confined aquifer have resulted in the loss of artesian flow of wells and the decline of the water table. Groundwater studies have established a strong link between the confined and the unconfined aquifer as well as an impact on surface water flows to the Rio Grande which influences the Rio Grande Compact with downstream states. In the 2004 Groundwater Rules and 2006 rulings by Judge Kuenhold, there "is no unused water" within the confined aquifer, despite RWR's continued suggestion that there is available water.

The health and sustainability of the agricultural landscape of the SLV is intertwined with the health and sustainability of the wetland, riparian, and riverine ecosystems that help maintain water tables, water quality, and water quantity in the SLV. A majority of the native hay meadows that exist in the SLV, many of which are privately owned and integral to ranching operations, are actually wetlands that provide significant habitat for a variety of waterfowl and Greater Sandhill Cranes. The premise that RWR's proposal to provide \$50 million would help the community thrive is false. In reality, many of the flooded irrigated agricultural lands and other types of agriculture that work in concert with wetlands to sustain water tables provide for not only economic stability in agriculture but for an increasing demand for

tourism, hunting, and recreation that are projected to increase substantially in this region. Over 500,000 people visit the Great Sand Dunes National Park (GSNP) annually which is an increase of 60% over the past decade. Data from 2017 included in the Colorado Statewide Comprehensive Outdoor Recreation Plan (SCORP; 2019) of Colorado residents indicated that \$728 million was spent in the south-central region which had the highest economic output statewide for wildlife watching at \$277 million. Hunting in the six SLV counties account for approximately \$12 million annually in economic output. A recent economic study of the impact of the annual Monte Vista Crane Festival for the SLV indicates that this event alone brings in over \$3 million to the region every March. A one-time payment of \$50 million by RWR would not make up for the millions lost over-time from growing revenue from recreation, wildlife, and continuation of the strong agriculture industry, which rely upon our water resources.

Stakeholders within the SLV have been working diligently for over a decade to develop groundwater rules and regulations within six sub-districts to find sustainable solutions for ourselves rather than have the State Engineer determine rules for us. Depletions to the confined aquifer continue to occur despite sub-district efforts to reduce pumping, in part due to continued drought conditions. Any export of water will further exacerbate the limited water resources that are available not only for agricultural activities but for wildlife as well. For example, the entire Rocky Mountain Population of cranes migrates through the SLV twice annually, during spring and fall. A recent study (Donnelly et al 2021 – *Migration efficiency sustains connectivity across agroecological networks supporting sandhill crane migration*) documents the importance of the SLV for these 20,000 cranes annually which rely on grain crops and seasonally flooded wetlands or native hay meadows. The confined aquifer is already over appropriated, providing less water resources annually to sustain migration populations of not only cranes but waterfowl and many other species. Any outside effort to take more water out of the system will further exacerbate an already struggling system.

RWR claims their project will have no negative impacts on the confined aquifer and will comply with all rules including 1:1 replacement by retiring wells. In fact, the project will at least double the amount of pumping occurring in the San Luis Creek Response Area. The State's Rio Grande Decision Support System (RGDSS) model shows that the confined and unconfined aquifer are connected within this area at the north end of the SLV and near the Baca National Wildlife Refuge (Baca NWR). A recent project 'SLV Wetland and Wildlife Conservation Assessment' (2019; SLVWWCA) utilized new GIS modeling from the Intermountain West Joint Venture to determine hydrologic extent of water across six time periods since 1984 in the SLV. This information indicates that >50% of the wetlands across the SLV have been lost and that about 90% have been lost in and around the Baca NWR. The Baca NWR, GSNP, San Luis Lakes State Wildlife Area, and Blanca Wetlands Management area (Blanca Wetlands) lie, north to south, within the historic path of San Luis Creek which historically maintained a permanent stream channel but is now inconsistent to non-existent throughout a majority of the year in this stream reach.

Many threatened, endangered, and species of concern utilize the San Luis Creek corridor from Poncha Pass to the Blanca Wetlands. The Poncha Pass population of Gunnison Sage Grouse (Threatened) depends upon resources provided by San Luis Creek and its tributaries for brood rearing annually as do a population of Rio Grande Chub (Chub; candidate species for Endangered Species Listing). One of the few remaining Colorado chub populations occurs in Crestone Creek on the Baca NWR near the location of the area RWR would like to 'buy and dry'. 'Buy and dry' will lower the water table and continue to exacerbate already limited water resources north of the Baca NWR impacting surface and groundwater levels south to the sump area of Blanca Wetlands. Blanca Wetlands is an Audubon Important Bird Area supporting

over 180 species of birds including the largest breeding population of western snowy plover in Colorado and 13 threatened, endangered, and sensitive wildlife species. The RLSWA lies to the west of the Baca NWR containing the historic Russell Creek drainage that ultimately fed San Luis Creek. Water table declines over the years have prevented surface water flow from reaching Saguache Creek which then empties into San Luis Creek at the northwest corner of the Baca NWR. RLSWA is a National Natural Landmark containing one of the largest remaining high-elevation alkaline marshes (bulrush marsh) in the United States. This provides white-faced ibis, a Colorado Parks and Wildlife Statewide Action Plan species of concern with the most significant breeding area in the state. Overall declines in water availability from any 'buy and dry' within this hydrologically connected area will continue to negatively impact both surface flow and groundwater tables and thus habitat sustaining these important places for wildlife.

The SLV Wetland Focus Area Committee members hope that the important, factual, data driven, evidence presented here provides the Commissioners with the information they need to make a true, accurate, and equitable decision. RWR has misled and misinformed not only the SLV public but also Douglas County in their effort to export an over-appropriated groundwater resource from the SLV. RWR's proposal to withdraw water from a drought stricken, over appropriated basin and their promise that their proposal would not negatively impact water rights, users, and the resource is factually wrong. Water sustainability is one of the most important challenges that we all face in each basin across Colorado. Exacerbating water scarcity conditions in one basin to meet future needs on the front range is not a responsible, educated, or in the end, a sustainable solution.

Thank you for your consideration.

Sincerely,



Cary Aloia

SLV Wetland Focus Area Chairwoman

Enclosure

Link to Donnelly et al 2021

<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.3543>

Link to SLV Wetland and Wildlife Conservation Assessment

https://wetlanddynamics.com/wp-content/uploads/2020/04/SLVWetlandWildlifeConservationAssessment_Final_Edition2.pdf

Link to SCORP report <https://cpw.state.co.us/Documents/Trails/SCORP/Final-Plan/2019-SCORP-Report.pdf>