



Bureau of Reclamation
Attn: Ed Warner, Area Manager
445 West Gunnison Ave, Suite 221
Grand Junction, CO 81501
paradoxeis@usbr.gov

February 19, 2020

Michael Fiebig
Director, Southwest River Protection Program
American Rivers
1536 Wynkoop Street, Suite 321
Denver, Colorado 80202
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Re: Paradox Valley Unit Draft EIS

Dear Mr. Warner,

On behalf of American Rivers and our 350,000 members, supporters and volunteers across the United States, many of whom have recreated on the Dolores River at some time during their lives, we are submitting the following comments regarding the Bureau of Reclamation's Draft Environmental Impact Statement (DEIS) for the Paradox Valley Unit. We are particularly interested in decisions that could impact the eligibility and suitability of the Dolores River corridor under the Wild and Scenic Rivers Act, as well as the potential impacts of the project to ecological integrity, scenic character, cultural resources and recreation values in the river corridor and surrounding valley.

About American Rivers

American Rivers is a leading conservation organization working to protect and restore the nation's rivers and streams. Our mission is to protect wild rivers, restore damaged rivers, and conserve clean water for people and nature. Since 1973, we have conserved more than 150,000 miles of rivers through Wild and Scenic River (WSR) designations, dam removals, on-the-ground projects, and advocacy efforts. Our Colorado River Basin Office is located in Denver, and our new Southwest River Protection Program is based in Durango. Both are actively engaged in the protection and management of the Dolores and San Miguel river systems, as well as the larger Colorado River system.

Analysis of Alternatives in the DEIS

Our recommendation is that the Bureau of Reclamation (BOR) choose Alternative A, the "No Action" alternative, due to several significant deficiencies in DEIS. In particular, we oppose Alternative B because it is incompatible with the non-impairment standards required for management of Wild and Scenic eligible and suitable rivers, and adjoining BLM lands in the Dolores River Canyon Wilderness Study Area (WSA). The other alternatives, C and D, also propose significant detrimental impacts to both the surrounding ecosystem and nearby

communities. We recommend that BOR complete a holistic analysis of the costs and benefits associated with the entire Colorado River Salinity Control Program, weighing the future of the Paradox Valley Unit (PVU) against other potential new salinity control measures that could be carried out in the basin, ideally in a lower impact, more cost-effective manner.

Alternative A – No Action

American Rivers' preferred alternative, chosen to protect the values of the Wild and Scenic eligible and suitable Dolores River corridor and surrounding areas as required for streams found to be either eligible or suitable for designation under the Wild and Scenic Rivers Act.¹ It is also the only alternative that would maintain the rural character and ecological integrity of the Paradox Valley.

Alternative B – New Deep Injection Well

This is the worst of the four alternatives, from the perspective of impacts to river protection policy and the Dolores River Canyon itself. The potential impacts to the Dolores River corridor and surrounding mesas in this alternative would be far too great, including large seismic studies, surface facilities, new roads, two new bridges over the river in the *suitable* Wild and Scenic corridor, extension of powerline corridors, a new pipeline, and potentially new pump stations, depending upon which site is chosen.

Native American archeological sites, scenery, river-based recreation, fish, wildlife and vegetation Outstandingly Remarkable Values (ORVs) would likely be damaged, degraded or destroyed, permanently impacting the lower end of the Slickrock Canyon stretch of the Dolores River. This canyon is largely considered the most beautiful and accessible of the three main whitewater boating runs below Bradfield Bridge on the Dolores River, offering multi-day whitewater recreationists mellow rapids, incredible scenery, and a sense of solitude and timelessness.

This section of the Dolores River was also found to be both *eligible* and *suitable* for designation under the Wild and Scenic Rivers Act by the Bureau of Land Management's Uncompahgre Field Office, conferring protection on its free-flowing character and suite of ORVs for the life of the Resource Management Plan (RMP). Impacts of the project would also extend into the Dolores River Canyon WSA, in violation of the non-degradation standards required by that designation.

Alternative C – Evaporation Ponds

This proposed alternative, while better preserving the river corridor, would potentially pose an outsized risk to migratory birds, wildlife and the residents of the Paradox Valley.

The massive project would include a include a “27-acre surge pond, a 39-acre concentrator pond, 290 acres of crystallizer ponds, a 24-acre bittern (remaining liquid) concentration pond, and a 10-acre-foot bittern storage pond. A hydrogen sulfide (H₂S) treatment system would be included to remove H₂S before brine is discharged to the evaporation ponds. Salt would be harvested from the evaporation ponds and disposed of in a 60-acre, onsite salt landfill, which would reach an ultimate vertical height of 100 feet above the ground surface,” rivalling the industrial impact of a large mining operation. The Dolores River is chronically dewatered even in wet years. American Rivers is concerned about potential water usage with this alternative as well.

¹ See: Final Wild and Scenic River Suitability Report for the BLM Uncompahgre Planning Area, BLM, 2013. (https://eplanning.blm.gov/epl-front-office/projects/lup/62103/78805/90472/WSR_Suitability_Report_Final_04272012.pdf)

Alternative D – Zero Liquid Discharge Technology

This alternative would essentially take much of the industrial impact of the evaporative facility in Alternative C, and move it into a massive, 150,000 square foot building, 40 feet tall, plus a series of salt drying bins each 100 feet tall. While potentially less impactful to birds and wildlife than Alternative C, Alternative D would nevertheless permanently change the rural character of the Paradox Valley to an industrial one. The Dolores River is chronically dewatered even in wet years. American Rivers is concerned about potential water usage with this alternative as well.

Conclusion

Thank you for considering these comments. We urge the Bureau of Reclamation to choose Alternative A, the “No Action” alternative. While American Rivers recognizes the importance of controlling salinity in the Colorado River system, this work should not take place in areas where it would impact or supersede existing protective designations, natural resource values, ecological integrity, or cultural values.

We hope that the Bureau will take a hard look at the information that we have provided in these comments, and focus its future salinity control efforts outside of the Dolores River corridor and the Paradox Valley. We would be happy to meet in person in order to discuss any of the information that we have provided in this letter.

Sincerely,



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CC: BLM's Uncompaghre Field Office