LIVING RIVERS
COLORADO RIVERKEEPER®

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Sent via email to: jana_mohrman@fws.gov

Re: White River Management Plan, Flow Recommendations, and Programmatic Biological Opinion

Dear Jana,

These comments are submitted to US Fish and Wildlife Service by Living Rivers and Colorado Riverkeeper based in Moab, Utah. Our purpose in writing is to submit our preliminary concerns about the White River basin, and specifically how this relates to the proposed completion of a management plan, flow recommendations and a programatic biological opinion for the designated critical habitat of native endangered fish and native species of concern. Providing these documents is urgent, now that the Department of Interior has issued a Record of Decision (March 13, 2013) for the Programmatic Environmental Impact Statement that was prepared for the potential commercial development of oil shale in Wyoming, Colorado and Utah, and tar sands in Utah.

BACKGROUND

The White River has a drainage of 3,750 square miles. The average annual rainfall varies from over 40 inches in the headwaters (Flat Tops Wilderness) to 10 inches at the town of Rangely near the Colorado-Utah border. The average annual streamflow in the White River at the Colorado-Utah state line is 596,000 acre-feet.

Traditional extraction of oil and gas have been used in the White River basin since Chevron Oil discovered the Weber Sandstone oil field in the 1930s.

The Piceance Creek Basin and the Uinta Basin host some of the largest oil shale deposits and coal bed methane reservoirs known. Although oil shale and tar sand

extraction is not practiced on a production scale as yet, many conditional water rights have been filed in these two basins for development of such unconventional fuels.

The towns of Meeker and Rangely draw their culinary water from the White River via alluvial wells at about 1,000 acre-feet per year, and some of this water is used for irrigation and watering stock. The water quality has a high percentage of dissolved solids.

There is a dam on the main stem of the White River (Taylor Draw Dam), and further upstream there is a dam on a tributary called Big Beaver Creek. Taylor Draw Dam and Reservoir (also known as Kenney Reservoir) has a storage volume of 13,800 acre-feet and is used primarily for recreation and hydropower generation. The dam is located just east of Rangely, Colorado and was constructed by the Colorado River Water Conservation District, and is now owned and operated by Rio Blanco Water Conservancy District.

Kenney Reservoir is fast-approaching dysfunction as a result of sediment filling. The fish in the reservoir include non-native species known to harm the recovery of native fish, and have migrated into the White and Green river reaches downstream of the dam. The nutrient level of the reservoir is imbalanced and consequently has algae and phytoplankton blooms. The size of the reservoir is probably not large enough for managers to fully utilize adaptive management criteria to support the recovery of the endangered fish populations.

The critical habitat of the White River has already been identified as an important component of endangered fish recovery in the upper basin, and that depletions of about 10% of the total annual flow could make the difference between success and failure for this co-operative multi-agency program. The depletions would also increase the loading of salt and heavy metal loading in the Colorado River basin.

Other issues to consider for a management plan for the Department of Interior and Utah Division of Water Resources would include satisfying the water rights of the Uintah and Ouray Ute Nation.

Suggestions for the Department of Interior to be Considered

1) A monitoring and research program should be implemented and well-funded.

2) Criteria for reducing nutrient, salinity and heavy metal inputs into the White River basin should be implemented.

3) A Non-native fish removal plan should be implemented.

4) A sediment survey should be completed at Kenney Reservoir to determine it's lifetime, so that the Rio Blanco Water Conservancy District can prepare for an action plan for license renewal, sediment removal or, ideally, dam decommissioning.

5) Depletions from the White River for the development of unconventional fuel resources should never occur, because it is fairly obvious that the White River basin does not have enough water to simultaneously support a viable endangered fish recovery program and a viable energy fuels program.

This concludes our comments. Please do include our organization for future notifications of meetings and the release of publications.

Sincerely yours,

John Weisheit
Conservation Director
Colorado Riverkeeper