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Organization: Fire Mountain Canal & Dryamp; Reservoir Co

Title:

Comments: The shareholders of the Fire Mountain Canal and Reservoir Company use water from the North Fork of the Gunnison. This water originates on the Grand Mesa and the Gunnison National Forests.

We appreciate the FS's awareness of the crucial importance of this resource to the agricultural economy in the North Fork Valley and to associated businesses. 25% of the surface water of the GMUG is diverted for agriculture and ¼ is consumptively used by crops and livestock.

In the time of rapidly changing climatic conditions, we urge flexibility in the plan to allow for unforeseen demands on the 2.8M acre feet of water yield of the GMUG. If the drought continues, the 1922 CO River Compact may call for post-Compact water so that Lake Powell can continue to produce electricity. There are many factors to balance in these decisions. No one knows how this will play out, but there may be need for changes in some infrastructure that might take place on FS land. Language such as Management Approaches that say, "When considering authorization for water developments and uses, the State of CO's Instream Flow process" ... may provide for environment flows but that is hardly the only issue for consideration for these decisions.

Many goals and projects in the CO Water Plan involve securing water supplies for municipal, industrial and agricultural uses. FS land is an important source for these water supplies, location of diversions and storage. The plan pledges to collaborate to meet the goals of the BIP's. Increasing wilderness areas and roadless areas will complicate this. Instream Flow designation on additional segments of perennial, intermittent and minor streams, especially in watersheds where development that would change the natural environment is unlikely, seems another layer of unnecessary rules.

In areas where aspen die off left hundreds of dead trees that have blown down, the undergrowth uses much summer run off. Management of dead trees and unusable vegetation would increase water supplies and decrease danger of unmanageable fire. A plan to prioritize watershed for restoration would be desirable. Currently annual predictions of snow runoff are very inaccurate. Additional Snotel sites on the forest would generate valuable data.