Water comments for revised GMUG plan

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1. Bypass flow should be applied as a last resort only.

The agency and stakeholders have identified twenty-two alternatives to federal bypass flows. **Bypass flows should only be applied to permit holders once those 22 alternatives have been exhausted**.

They include habitat improvement, purchase of storage rights and other alternatives.

2. Combine forest projects when possible

Whenever it is possible, **analyze Forest Health and Watershed Health projects simultaneously,** so they can be considered in concert. <u>It all happens on the same piece of dirt.</u> They both have the ability to positively impact long-term water QQ.

For instance <u>Ute Water Conservancy</u> has an MOU with the Forest Service on fuels reduction with a particular focus on projects in its watersheds on Grand Mesa, the primary water source for the district and its 85,000 domestic users. The water district also has operation and maintenance plans on filed with the Forest Service for water infrastructure maintenance in roadless portions of the Grand Mesa.

3. Motorized and mechanical access to Forest is necessary for safe operation and maintenance of water facilities.

This is probably the biggest sticking point. Make sure Forest plan recognizes this.

Where possible **streamline the approval process** for maintenance and operation of water systems. <u>There is a finite window of time between snowmelt</u> and snowfall, and access, maintenance and operation of water system infrastructure must be accomplished efficiently within that window.

4. Oppose additional wild and scenic provisions or expansions, wilderness expansion, new wilderness and areas managed for wilderness.

Water management activities on those lands are unnecessarily cumbersome or even prohibited. And managing forest health projects on such lands is rendered equally difficult.

For example, seek to avoid a Bolts Ditch scenario in Minturn, where the Forest Service largely denied access for maintenance and operation of a headgate because it was less than 100 yards within wilderness boundaries. Remedying that literally required an act of Congress and 6 years.

Additional:

Encourage GMUG to continue to **create partnerships with stakeholders** to find creative solutions to forest issues.