# Dolores Water Conservancy District

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Derek Padilla, Dolores District Ranger
San Juan National Forest

RE: Scoping Comments: Salter Vegetation Management Project from
Dolores Water Conservancy District (DWCD)
80 South Cactus, Cortez, CO 81321

The comments that follow are submitted on behalf of the Dolores Water Conservancy District. DWCD is an active partner in the DWRF (Dolores Watershed Resilient Forest) Collaborative, and these comments are informed by ongoing engagement by DWCD with the DWRF Collaborative.

**Project Map - Anticipated Benefits to McPhee Reservoir, Dolores Project Water Users & the Ecology & Recreational Opportunities that Sustain Our Community:**

The Scoping Map identifies treatment areas within the watershed the flows into the Dolores River and McPhee Reservoir, the third largest reservoir in Colorado constructed and owned by the US Bureau of Reclamation and operated in cooperation with DWCD. The benefits that proposed treatments will have on water quality and availability are of profound interest to everyone that relies on McPhee Reservoir as their water source.

McPhee is a feature of the Dolores Project built in the 1980s and fully operational in the early 2000s. McPhee Reservoir supplies irrigation water to over 70,000 acres of irrigated land and municipal water to multiple Towns.

The Dolores Project is a centerpiece of the Colorado Ute Indian Water Rights Settlement which includes the subordination of the Ute Mountain Ute Tribe's senior water rights on the Mancos River in exchange for irrigation and municipal water from the Tribe's participation in the Dolores Project. As a result, the Tribe has a highly efficient and productive 7,600-acre Tribal farm. The Water Rights Settlement brought drinkable water to the Ute Mountain Tribal community of Towaoc for the first time in their history, which has allowed for the housing and commercial expansion that has occurred in Towaoc since domestic water became available in the late 1980s.

When McPhee Reservoir is not able to store enough water to meet Dolores Project obligations, shortages are shared proportionately by the Ute Mountain Farm and Ranch Enterprise, other Dolores Project irrigators and the "base pool" that is released to support the fishery below McPhee Reservoir. By contrast, when the Dolores River yields more water than McPhee can store, all project users have a full supply and there is excess water to release for the 200 miles of excellent boating, with enhanced native fishery water releases.

Carry-over storage benefits everyone: Communities, Ute Mountain Tribe, Irrigators, Boaters and the Fishery are driven by "carry-over storage" in McPhee Reservoir. The Salter Vegetation Management Project will avoid damage and disruption to water supplies by lowering the risk of catastrophic wildfire and the damage done by toxic runoff into the Dolores River from fire scars. These vegetation treatments will also improve forest resilience on a significant scale, which will contribute to the availability and quality of Dolores River water flowing into McPhee Reservoir.

There are a wide range of additional benefits from the Salter Vegetation Management Project. Much of the area on the Scoping Map includes some of the most highly used recreation, wildlife viewing and hunting areas on the San Juan Forest. Areas that have received mechanical and prescribed fire treatments offer improved recreation and hunting opportunities coupled with significant reduction in wildfire risks.

DWCD has also participated in a "Stream Protection Task Team" organized by Duncan Rose of TU "Dolores River Anglers" to evaluate tributaries to the Dolores River above McPhee Reservoir that are home to greenback lineage native trout. Fin studies continue to identify additional native trout populations. The Task Team is evaluating where native populations reside, their risks relative to climate change and water temperature, and what tools will best protect and enhance priority native fish populations going forward.

The Stream Protection Task Team is made up of TU, DWCD, San Juan National Forest and Colorado Parks and Wildlife. In addition to this work group, native trout are called out in DWRF watershed asset mapping. Where these native trout populations intersect with Salter Vegetation Management activities, the well-being of these native trout populations needs to be considered. In some cases, mitigation of wildfire risks could be a very important protection for these trout populations.

With regard to the Dolores River below McPhee Reservoir, DWCD is an active partner in the broad-based Monitoring and Recommendation Team which is aligned to cooperatively implement the Lower Dolores Native Fish Implementation, Monitoring and Evaluation Plan of 2014. Releases of excess water from McPhee Reservoir are carefully planned and monitored to maximize benefits to three sensitive native fish coupled with quality boating experiences. The mutual realization that the quality of the boating experience is directly related to the heath of the river has produced a strong alliance between ecological advocates and boating enthusiasts.

A critical point about the ecological and recreational opportunities below McPhee Reservoir is that these opportunities are driven by "carry-over storage" in McPhee from one year to the next. More resilient forests will support improved water quality and enhanced carry-over storage. Forest resilience is a win for everyone: towns, irrigators, the Ute Mountain Tribe, recreational users, hunters, boaters and native fish advocates.

It is this combination of interests that make the Salter Vegetation Scoping Map broadly significant to our communities and the ecology that sustains us.

**Proposed Action:**

Encompassing 35,000 acres, the Salter Vegetation Management Project Area allows for planning, resilience treatments and monitoring of results on a landscape scale that encompasses the full range values outlined in the Scoping Package and this comment letter. Treatments on this scale have attracted wood products businesses that can realize commercial values from the proposed treatments, making it financially feasible to treat and restore forest resilience on a landscape scale while providing other ecosystem services as an outcome of their work. These wood businesses have already created approximately 100 new jobs, along with the capacity to implement the resilience treatments outlined in the Salter Vegetation Management Project.

Treatments in the Salter Vegetation Project are designed to improve forest resilience, increase structural diversity and provide economic support to local communities.

**Single Tree Selection Units.** The Salter Scoping Map is dominated by "Single Tree Selection Units". This approach supports uneven age conditions with clumps of larger trees and every size class including seedling regeneration. The openings created when these units are treated allow for the introduction of prescribed fire to control oak brush, burn off duff and expose bare soil to support seedlings. Prescribed fire will also reduce ladder fuels, allowing for natural fire to run its course once ponderosa pine stands are returned to their natural "fire adapted" reference conditions.

The "Single Tree Selection Units" in the Salter Project overlap with some of the most highly used recreation, trail and hunting areas on the San Juan Forest. Single tree selection allows for prescriptions that work in and around these high value areas for ecological improvement, recreational enjoyment, asset protection and personal safety.

There are robust discussions going on among our collaborative partners concerning the value placed on retaining older, larger trees which are present in these units. Desired basal area of 50-70 BA per acre is the target for fire and bug resilience and a return to more natural reference conditions. While it is desirable to retain a significant component of larger trees, adequate basal area needs to be available for the full range of age classes which make uneven aged stands most resilient to disturbances.

In ponderosa pine stands, with abundant large trees, some will need to be removed to allow for other age classes. There is an interest in avoiding the removal of "pre-settlement trees." A literature search has indicated that slower growing trees are more resilient to bugs and fire than faster growing trees of similar diameter. If the prescription on any unit involves removal of larger trees to meet basal and uneven age criteria, it would be preferable to save the pre-settlement trees and take out faster growing trees

that established later. If pre-settlement trees can be identified, they should be prioritized for retaining over their faster growing cousins.

**Commercial Thinning, Pre-Commercial Thinning, and Plantation Thinning** are intended to move stands in these categories towards uneven age management. These sites do not include the range of opportunities necessary to pursue single tree selection in the present, but proper treatment will increase resilience in the near term and open up opportunities for single tree selection and uneven aged diversity at a future point of entry. These sites are not as ecologically diverse but the objective is to move them towards greater diversity over time.

**Asset and Resource Protection.** Improved forest resilience will protect community assets. These include water infrastructure, power infrastructure, residential and commercial structures and road and trail systems. Forest resilience must also address soils, aquatics, fisheries, livestock grazing and wildlife. We encourage stewardship contracts, cross boundary treatments and other available means to protect these assets and natural resources. We look to the DWRF Collaborative and the full range of stakeholders to align and monitor these values in relation to proposed treatments. Getting the roads and community awareness in shape to handle the increased level of log truck activity will provide major challenges that must be addressed collaboratively with a strong outreach component that DWRF can help provide.

**Conclusion.** In closing, let me return to the role of DWCD in providing for the water future of the communities we serve. It has become increasingly clear that, as water managers, we must look beyond our reservoirs and water delivery systems to the watersheds that are the source of the water that we manage and distribute.

DWCD is committed to work with the DWRF Collaborative, the Southwest Basin Roundtable and every member entity to advance forest resilience in Southwest Colorado. We will do our part to bring every available resource to bare on making the most of Salter Vegetation Management Project in relation to all of the values described above. It should also be noted that Southwest Colorado has been selected as the focal area for the Rocky Mountain Restoration Initiative (RMRI). We will work with our RMRI partners in support of the Salter Vegetation Management Project and the full range of values that it addresses.

We appreciate this opportunity to comment.

Sincerely,

Michael Preston, External Relations
Dolores Water Conservancy District