

## The Uncompahgre Valley Water Users Association

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RE: GMUG Forest Plan Revision

Dear Mr. Stewart,

Thank you for the opportunity to comment on the GMUG Forest Plan Revision. We've not participated in forest planning in the past and have no particular expertise in forestry per se. We do have significant concerns on the Gunnison National Forest which is the location of the headwaters of our agricultural supply.

The Uncompahgre Valley Water Users Association was developed in 1902 in order to plan an irrigation system that would bring water rights from the Upper Gunnison and storage in the Taylor Park Reservoir, down to Blue Mesa Reservoir thence via a tunnel to feed a gravity-based system to irrigate 83,000 acres of land in Montrose and Delta Counties. The irrigation for this project is diverted from rivers into a network of canals and laterals including some 128 miles of major canals, 438 miles of laterals, and 216 miles of drains. The laterals carry irrigation water to headgates into private ditches and facilities operated by local farmers and landowners. After use, the tail water flows away from the properties into laterals to be re-used and into drains, and the drains support the groundwater table of the valley with eventual return back into the rivers. This was an innovative project and the first major project approved by the Secretary of Interior under the Reclamation Act. Thus our organization is one devoted to an irrigation system that.....farm econ numbers.

Our organization has been devoted to efficient consumptive use of our water, a commitment to water quality (note the Selenium project that used science and dollars to reduce naturally occurring selenium from streams and rivers to the enhancement of this ecosystem.)

Clearly our organization is integrally involved with the national forests comprising the GMUG. We are supportive of your efforts to increase partnerships with water providers both municipal and agricultural.

Along with many other water suppliers throughout Colorado, we have become increasingly concerned about the hotter, drier weather, the snotel data showing changes in runoff amounts and timing, and of course, the increasing threats of wildfire in our headwaters. This plan revision is a good opportunity to plan to safeguard and manage the forests and waters of the

GMUG. Active and adaptive management as evidenced in the SBEADMR, Taylor Park Adaptive Management and the Wilder CE are good models going forward. They should be highlighted in the revision as tools to protect Infrastructure, to support Fire and Fuels Management, to enhance Water and Water Resources. These specific plan elements refer to 'efforts to minimize long-term impacts to water quality and water quantity', as well as referring to efforts to 'reduce the risks and negative impacts of uncharacteristic wildland fire'.

Our biggest concern is that this type of criteria noted above didn't seem to be applied to the areas identified in Alternative C "Special Area Emphasis". Would the 621,000 acres of wildlife management preclude active forest management or development of post-fire debris flow catchments? A surprising designation of 246,000 acres of wilderness or special management designations in Gunnison show new management areas extending to the edge of Taylor Park Reservoir and along the rivers and streams comprising the UVWUA headwaters. Has anyone analyzed the unintended consequences to this important component of the UVWUA system?

Our deep concerns on this subject lead us to ask for more analysis. It also advises us to advocate for active management and forest service land use designations that do not preclude proactive wildfire risk mitigation. Not every remedy requires cutting a tree, and enhanced wetlands, protected beaver habitat and more aspen may all require active management.

While we are not a forester based or environmentalist NGO, we would appreciate all efforts to protect our water supplies for agriculture in the Uncompahgre Valley as well as our neighboring ag suppliers in the headwaters above.

Sincerely,



Daris Jutten  
President