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January 25, 2018

To:

Jared Baxter
Fish & Wildlife Biologist
Bureau of Reclamation
Provo Area Office
302 East 1860 South
Provo, Utah 84606
(801) 379-1081

From: Save The Colorado

RE: Comments on the "Big Sandy Enlargement Project Draft Environmental Assessment PRO-EA-16-012"

Dear Mr. Baxter,

Thank you for the opportunity to provide comments to the U.S. Bureau of Reclamation regarding the Big Sandy Enlargement Project Draft Environmental Assessment PRO-EA-16-012¹. As noted in our email exchange on January 22, 2018, the Bureau of Reclamation failed to correctly and legally notify the public² about the public comment period for the Big Sandy Reservoir Enlargement Draft Environmental Assessment ("DEA"). As such, we have asked you to allow us to provide comments, and your email³ responded by saying that you would accept comments. We ask that these comments be placed into the legal, public record for the Environmental Impact Statement Process for the Big Sandy Reservoir Enlargement.

¹ <https://www.usbr.gov/uc/envdocs/ea/pdf/BigSandyEnlargeDraftEA.pdf>

² <http://www.pinedaleonline.com/news/2017/11/BOCfumblesBigSandyas.htm>

³ Email response from Mr. Baxter, dated and content:

----- Original Message -----

Subject:Re: Comments on the Big Sandy Reservoir Enlargement

Date:Tue, 23 Jan 2018 07:11:01 -0700

From:Baxter, Jared <jbaxter@usbr.gov>

To:Gary Wockner <gary@savethecolorado.org>

References:<5A63C482.6050200@savethecolorado.org>

Gary,

Thank you for your interest in the Big Sandy Enlargement project! You are welcome to submit comments to me via this email address or via hard copy mailed to the address listed in my signature block.

Thank you. Jared.

First, the DEA completely fails to identify or analyze the streamflow reduction in the Big Sandy River, downstream of the dam, due to the proposed reservoir enlargement. The “hydrology” section of the DEA (Section 3.3.5) is ridiculously facile and non-technical. The section completely fails to:

- Identify the amount, in acre feet or cubic feet per second, of additional water diverted from the Big Sandy River below the proposed expanded dam.
- Analyze the impacts of the additional water diversion on the hydrology of the river below the dam.

Then, absurdly, in Section 3.7 (page 40), in the “Summary of Environmental Effects” table, the DEA says there is “No Effect” on the hydrology of the Proposed Action.

Of course, there has to be an effect on the hydrology of the river, because the reservoir is proposed to be expanded precisely to take more water out of the river. In fact, the DEA identifies that the reservoir is proposed to be expanded – Section 1.2, the “Purpose and Need”, states exactly that:

“The current storage capacity is 38,600 acre-feet. A 5 foot raise of the spillway crest would allow a total storage capacity of 52,300 acre-feet or an increase of 13,700 acre-feet.”

And then says,

“The additional water stored in the reservoir is needed to firm up the water supply for lands irrigated in the Farson/Eden area through the Eden Project.”

The streamflow reduction must be identified, and then the environmental impacts of that reduction must be analyzed on the downstream:

- Wetlands
- Water Quality
- Fishery
- Aquatic Life
- Other Wildlife Resources.

Second, because the DEA completely fails to identify or analyze the reductions in streamflow in the river, and the total acre-feet reduced, the DEA completely fails to identify and analyze any cumulative impacts that may occur on the flow in the Green River downstream and the Colorado River further downstream.

As the Bureau of Reclamation is well aware, the entire Colorado River system – including its tributaries in Wyoming which includes the Big Sandy River – is extremely stressed with threats of shortages, compact calls, and other types of “contingency plans” to address the likely and looming water shortages. The Bureau itself has spent considerable resources studying the “water supply and demand” problem on the Colorado River⁴. The amount of new water

⁴ <https://www.usbr.gov/lc/region/programs/crbstudy.html>

diverted from the proposed expansion of Big Sandy Reservoir must be identified, and then the cumulative impact of that new diversion must be analyzed in the face of the threats to water supply in the Colorado River basin.

Further, climate change scientists predict that the amount of water in the Colorado River system is going to decrease even further due to the impacts of climate change⁵. Any new diversion of water from the entire system must analyze its cumulative impact coupled with climate change reductions.

In closing, the DEA for the expansion of Big Sandy Reservoir is deficient. In order to comply with the National Environmental Policy Act, the Final Environmental Assessment must correct these deficiencies by identifying and analyzing all impacts. In addition, if the impacts are not adequately analyzed in the EA, the Clean Water Act may also be violated when the Bureau chooses the Least Environmentally Damaging Alternative.

We look forward to seeing these failures fixed in the Final Environmental Assessment. Please notify us when that Final Environmental Assessment is complete and available for public review and comment. Please contact me with any questions.

Thank you,



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Gary Wockner, PhD, Director
Save the Colorado: Colorado River Waterkeeper Network
Author: "River Warrior: Fighting to Protect the World's Rivers" (2016)
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The mission of Save The Colorado is to protect and restore the Colorado River and its tributaries from the source to the sea. Save The Colorado focuses on fighting irresponsible water projects, supporting alternatives to dams and diversions, fighting and adapting to climate change, supporting river and fish species restoration, and removing deadbeat dams. Save The Colorado has thousands of supporters throughout the Southwest U.S. from Denver to Los Angeles and beyond.

⁵ <http://onlinelibrary.wiley.com/doi/10.1002/2016WR019638/abstract>