



September 12, 2006

Mark Limbaugh
Assistant Secretary for Water and Science
U.S. Department of the Interior
1849 C Street, N.W.
Washington D.C. 20240

Re: Upper Colorado River Going Dry

Dear Mr. Limbaugh:

Operation of the Colorado-Big Thompson (CBT) project is causing serious problems in the upper Colorado River. I am writing on behalf of Trout Unlimited and its affected members to request that you look into the matter, release flows from Granby Reservoir as appropriate, and revisit the principles for operation of the CBT project in accordance with Senate Document 80 (SD 80) to prevent the situation from occurring in the future.

On September 6, 2006, Trout Unlimited received calls from senior irrigators in the Colorado River below Granby Reservoir, telling us that if they diverted their fully allotted senior water rights, they would completely dry up the river. Granby Reservoir is part of the CBT project and can capture the entire flow of the Colorado River. On September 1, 2006, in spite of a very dry summer and low base flows in the Colorado River, the CBT project reduced its releases of Colorado River water to a mere 21 cubic feet per second (cfs). Denver Water, which stores in Williams Fork, a tributary several miles downstream of Granby reservoir, has voluntarily agreed to reduce its diversions, providing some relief to the Colorado River below its confluence with Williams Fork, but not above it. Granby reservoir continues to let only 21 cfs of Colorado River flow through its gates.

As good stewards of their resources who do not want to see their river go dry, senior irrigators have been willing to sacrifice some of their own irrigation needs to protect the fish in the affected reach of the Colorado River. This outcome unfairly puts the burden of the CBT project on them and is contrary to SD 80, the document that dictates the operation of the CBT project.

SD 80 mandates that the CBT project be operated in a manner that is protective of both the Colorado River's irrigation rights and its fisheries. It requires that the project be operated to both "preserve the vested and future rights in irrigation" and "preserve the fishing and recreational facilities and the scenic attractions of Grand Lake, **the Colorado River**, and the Rocky Mountain National Park." (SD 80 at p. 2-3) (emphasis added). It specifically requires that the project be operated "to insure an adequate supply for irrigation, for sanitary purposes, for the preservation of scenic attractions, and for the preservation of fish life." (SD 80, paragraph (1)). The project is clearly not meeting the mandate of SD 80.

In 1961, the then Secretary of the Interior approved a document entitled "Principles to Govern the Release of Water at Granby Dam to provide Fishery Flows Immediately Downstream in the Colorado River." (Copy attached). This document contemplates the release of a maximum of 20 cfs from September to April from Granby dam to reflect paragraph (1) of SD 80. To our knowledge, this document was adopted without a public process or public analysis of fishery and irrigation needs, combined impacts with other large diversion projects or other such analysis as you would find today. Moreover, much has happened since 1961 - the demands on the upper Colorado River have significantly increased and the river flow has consequently changed, as more and more flows are transported over the Continental Divide to serve the needs of the metropolitan areas. It is time to revisit the 1961 document to determine current needs in light of these fundamental changes, and to adequately protect the irrigation and fisheries interests which Congress intended to be protected under SD 80.

Trout Unlimited requests that you investigate the matter and provide necessary relief to both the irrigators and the fisheries by (1) making immediate releases from Granby Reservoir as needed to satisfy both needs, and (2) initiating a public process to review and, if necessary, amend the 1961 "Principles to Govern the Release of Water at Granby Dam to provide Fishery Flows Immediately Downstream in the Colorado River."

Thank you in advance for your prompt attention to this matter. Do not hesitate to call me at 720.470.4758 or email me at mwhiting@tu.org with questions.

Sincerely,

s/Amelia S. Whiting
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cc: Hon. Sen. Ken Salazar
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