

V. Local Governments

Introduction

Beyond general expressions of approval or disapproval of the project, comments of the two local government entities are summarized below.

Issues Raised

- ❑ About one-half the concerns expressed centered on impacts to the trout fishery, fishing in general, and associated economic impacts, and they also focused on impacts to water quality.
- ❑ Other concerns included those in the areas of Reclamation responsibility under the CRSP Act, hydropower impacts, air quality, sedimentation, flood control, and limitations of the Low Flow Test.

Entities Included in this Section

City of Bloomfield
Farmington Convention and Visitors Bureau



City of Bloomfield DEC -2 2002

November 26, 2002

Bureau of Reclamation
Mr. Ken Beck
Western Colorado Area Office, Southern Division
835 East Second Avenue, Suite 300
Durango, Colorado 81301

Subject: City of Bloomfield position on the Draft Environmental Impact Statement - Navajo Reservoir Operations

Dear Mr. Beck:

The Bloomfield City Council has received and reviewed the Draft Environmental Impact Statement - Navajo Reservoir Operations (DEIS). The Council's position is that the preferred alternative of 250/5000 flow recommendation has the potential for serious economic and environmental consequences for the City of Bloomfield and the greater San Juan Basin.

- The Bureau of Reclamation (BOR) general comment is that at the recommended alternative of 250/5000, Bloomfield may exceed its National Pollution Discharge Elimination System (NPDES) permit. Areas of specific concern to the City are total dissolved solids (TDS) and fecal bacteria. TDSs currently are problematic because of several washes up stream from the City of Bloomfield's Wastewater Treatment Plant. With a 250 CFS release from Navajo Reservoir, river flow at our Wastewater Treatment Plant is anticipated to be approximately 130 CFS. BOR is concerned that this may impact our permit, pages III-97 & 128 DEIS Volume I. The City of Bloomfield concurs that this will negatively effect our Wastewater Treatment Plant operation. The City estimates that the recommended flow of 250/5000 would likely result in an excess of \$800,000 in plant improvements being required to meet our NPDES permit and approximately \$60,000 in loss revenue for a negative impact to our Wastewater Treatment Plant of nearly \$900,000.
Not specifically mentioned in the DEIS is the negative effect the 250/5000 flow alternative would likely have on the City of Bloomfield Water Plant operations. Low flows are more susceptible to higher TDS. This would effect our ability to divert water from the river during times of high TDS, require us to hold water longer in our reservoir, thereby causing a more rapid sediment build up and reduced reservoir capacity, and/or high cost in filtering the water. Higher maintenance costs to operate our reservoir, high chemical and filtering costs, cost of water rights to replace water lost in back flushing our reservoir, and other costs not yet calculated that would be a result of the low flow alternative recommended.
As you are probably aware the City of Bloomfield purchases all our electricity from the City of Farmington. The 250/5000 alternative will negatively effect the City of Farmington's Navajo Dam Hydroelectric Plant. The low flow will result in reduced production capacity that would most probably be made up by the use of fossil fuels. This will result in an estimated additional cost to the City of Farmington from \$5.3 to \$7.0

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LA1-1 Please see the response to General Comment 23.

LA1-2 Please see the response to General Comment 23. The City of Bloomfield presently receives its water supply via Citizens Ditch. Water quality studies during the low flow tests did not indicate that TDS increased significantly in this reach of the San Juan River; therefore, Reclamation does not anticipate any problems with water treatment.

annually. These costs are likely to be passed on to users such as the City of Bloomfield. The increased use of fossil fuels will negatively impact the San Juan Basin's air quality. The City of Farmington will likely have higher maintenance costs at their hydroelectric plant.

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- The 250/5000 does not adequately address flood control issues. The report acknowledges that at the 5000 CFS level flooding is possible particularly in Farmington south of the convergence of the Animas River. However sustained low flow releases that result in an accumulation of water in Navajo Reservoir needs be addressed.
- Sustained low flow will have a negative fiscal impact as mentioned above for the City of Bloomfield and in hydroelectric power operations. The sustained low flow will also negatively impact the recreational fishing industry. The 250 CFS flow alternative will reduce the "quality of the angler experience" and lead to a reduction of trout habitat. This is likely to negatively impact the tourist industry of San Juan County. The San Juan River Guide Association estimates over \$3 million dollars will be lost in tourism as a result of the flow recommendation of 250/5000.

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The Bloomfield City Council would like to offer some other general comments:

- We believe the current DEIS is flawed in that the report did not take into account the current drought conditions. Flow recommendations are based on a 1999 report. In addition, the report relies too heavily on data from a single summer low flow test, during which there was significant rainfall.
- The DEIS is biased in favor of the Endangered Species Act. It ignores the Bureau of Reclamation responsibilities under other acts, specifically The Colorado River Storage Project Act of 1956, which states that no dam may be operated to the detriment of the upper basin users. The City of Bloomfield believes the preferred alternative would be operating the dam to the detriment of the City.

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The City of Bloomfield recommends a sustained flow of 500 CFS with minimal high flow releases that are only necessary for the maintenance of the river. The City of Bloomfield thanks the Bureau of Reclamation for the opportunity to make these comments on the Draft Environmental Impact Statement - Navajo Reservoir Operations.

Sincerely,

Keith Johnson
Keith Johnson
Mayor

CC: Council
Curtis Gurley, City Attorney

LA1-3 Comment noted.

LA1-4 Please see the response to General Comment 25.

LA1-5 Analysis of alternatives contained the Army Corps of Engineers flood control diagrams which provide for flood storage in the reservoir for particular periods of time and at various forecasted inflows. Also see the response to General Comment 24.

LA1-6 Comment noted.

LA1-7 Please see the responses to General Comments 13 and 1a.

LA1-8 Please see the response to General Comment 10.



November 5, 2002

Mr. Ken Beck
 Bureau of Reclamation
 Western Colorado Area Office
 835 East Second Avenue, Suite 400
 Durango, CO 81301

Dear Mr. Beck:

I am writing this letter on behalf of the Farmington Convention & Visitors Bureau. We understand that the Bureau of Reclamation is proposing changing the flows from Navajo Dam on the San Juan River from a 500 cfs minimum to a 250 cfs minimum.

Fishing is a major attraction in our area and brings in millions of dollars to the local economy. We believe the low flows will be detrimental to the river for several reasons:

- The local economic will be severely impacted and jobs and businesses will be lost || 1
- The habitat of the river for the aquatic life, as well as the other wildlife that use the river, will be decreased by 34% || 2
- The trout population, considered to be one of the healthiest in the United States, will be decreased by 20—30% || 3
- The lack of water flowing through the river will increase sedimentation, thus decreasing the habitat even further || 4
- The low flows, especially in the summer months, will allow for more pollution and poorer water quality || 5

Because we believe the low flows will impact our area greatly, we are requesting the Bureau of Reclamation not decrease the flow and keep it at 500 cfs.

Sincerely,

Jeff Howle
 Jeff Howle
 Chairman

- LA2-1 Please see the response to General Comment 31b.
- LA2-2 Please see the responses to General Comments 28 and 30.
- LA2-3 Please see the response to General Comment 27.
- LA2-4 Comment noted.
- LA2-5 Please see the response to General Comment 23.

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