

Amigos Bravos • Audubon Southwest • Conservation Voters New Mexico • El Paso Group, Sierra Club • Friends of Bosque del Apache National Wildlife Refuge • Great Old Broads for Wilderness • New Mexico Wild • Rio Grande Chapter, Sierra Club • Rio Grande Restoration • Rio Grande Return • Rio Grande Valley Broadband, Great Old Broads for Wilderness • Rio Grande Waterkeeper • Trout Unlimited • Water-Culture Institute • WildEarth Guardians

Douglas County Commissioners' Office  
100 Third Street  
Castle Rock, CO 80104

April 12, 2022

Dear Commissioners Laydon, Teal, and Thomas,

We write to you today, on behalf of our organizations and tens of thousands of supporters across the American West, to express extreme concern over Renewable Water Resources' proposal to develop a groundwater pumping project in the San Luis Valley that would then export water to the Colorado Front Range. This project represents a serious threat to the water security of the San Luis Valley and to the plant, wildlife, and human communities that depend on this water source. As downstream neighbors we have grave concerns over the cascading effects of this project throughout the entire Rio Grande Basin, and we urge the Commission to reject this proposal.

***The Rio Grande Basin cannot afford for any water to be exported out of the Valley.***

This project would be the first pipeline built in the San Luis Valley with the intent to export water. But the idea of taking water out of the San Luis Valley for use in other basins is not new. Renewable Water Resources' proposal is the most recent in a string of such schemes that began in the 1980s. Similar proposals have been decidedly shut down by Colorado courts, which have noted the adverse effects these proposals would have on the aquifer and to surface water rights. In fact, surface waters in the Valley have been recognized as over appropriated since the early 20<sup>th</sup> century, meaning every drop that flows through the Valley and more is promised to someone. It is incredibly clear that the San Luis Valley has no water to spare.

***Exporting water from the San Luis Valley will threaten hope for a sustainable aquifer.***

In addition to surface waters, groundwater is also over appropriated in the Valley. We have serious concerns over the effects of the proposed pumping on overall groundwater levels and their impacts to surrounding wetlands and streams. Of particular concern are potential effects to the Great Sand Dunes National Park and Preserve and the Baca National Wildlife Refuge. Farmers in the Valley are already working together and making sacrifices to reduce water demand through the sub-district project, which was created following decades of drought conditions. This voluntary project facilitates farmers within the Valley combining efforts to ensure groundwater levels are maintained. Renewable Water Resources' proposal undermines years of this difficult work. The demands for water and

challenges associated with allocating it equitably will only increase as the impacts of climate change continue to intensify, this proposal will make an already challenging situation worse and undo years of community-driven efforts to find solutions.

**Exporting water from the San Luis Valley will have consequences for the entire Rio Grande Basin.**

The concerns over this project expand beyond the San Luis Valley. The project also has the potential to threaten the downstream communities and the environment in the Rio Grande Basin for thousands of miles. The Rio Grande Compact and the 1944 treaty with Mexico define how much water must flow from the Rio Grande's headwaters in Colorado to New Mexico, Texas and Mexico. As a headwaters state, Colorado has a significant responsibility to its neighbors and it is keenly felt downstream when those responsibilities are ignored. For example, during the twentieth century, Colorado consumed more water than it was allotted under the Compact and subsequently accrued a nearly one-million-acre-foot debt to downstream states. This overuse had consequences to downstream communities, agricultural production, and ecosystems. It resulted in lawsuits that ultimately ended with the U.S. Supreme Court requiring Colorado to repay this debt over time. Luckily for Colorado, a wet period of hydrology that filled downstream reservoirs triggered a provision of the Compact that forgave the prior debt and wiped the slate clean for better management going forward. With projected precipitation regime shifts under climate change, we are unlikely to see such a wet period again.

The water challenges we are facing within the Rio Grande Basin make it painfully obvious that a repeat of this situation would be catastrophic for water users across all three states and Mexico. We must think more holistically about the river systems on which we all depend. The San Luis Valley is an integral part of the Rio Grande Basin, a river that runs nearly 1,900 miles and sustains municipal and irrigation uses for more than six million people and two million acres of land across three states and two countries. We urge the Commission to not further complicate this situation by taking vital water from the San Luis Valley and threatening it and others' water futures.

The communities of the San Luis Valley are working to address their water scarcity challenges in collaborative and inclusive ways. Although there is still much work to do to create a sustainable aquifer and healthy Rio Grande for people and the environment, Renewable Water Resources' proposal flies in the face of these efforts. Please do the right thing for the communities within the San Luis Valley and those that depend on the water, also vital downstream, by rejecting this ill-advised project.

Sincerely,

Jen Pelz, Wild Rivers Program Director  
and Rio Grande Waterkeeper  
*WildEarth Guardians*

Joseph Zupan, Executive Director  
*Amigos Bravos*

Jonathan Hayes, Executive Director  
*Audubon Southwest*

Greg Peters, Public Lands and Wildlife Advocate  
*Conservation Voters New Mexico*

Laurence Gibson, Chair  
*El Paso Group, Sierra Club*

Deb Caldwell, Executive Director  
*Friends of Bosque del Apache National Wildlife Refuge*

Shelley Sibert, Executive Director  
*Great Old Broads for Wilderness*

Mark Allison, Executive Director  
*New Mexico Wild*

Camilla Feibelman, Executive Director  
*Rio Grande Chapter, Sierra Club*

Steve Harris, Executive Director  
*Rio Grande Restoration*

Todd M. Lopez, Executive Director  
*Rio Grande Return*

Linda Starr and Susan Ostlie, Co-Leaders  
*Rio Grande Valley Broadband, Great Old Broads for Wilderness*

Toner Mitchell, New Mexico Habitat and Water Program  
*Trout Unlimited*

David Groenfeldt, Executive Director  
*Water-Culture Institute*

**Colorado organizations supporting downstream communities' above message:**

Chara Ragland and Lousie van Vonno, Co-leaders  
*South San Juan Broadband, Great Old Broads for Wilderness*

Robyn Cascade, Leadership Team  
*Northern San Juan Broadband, Great Old Broads for Wilderness*

*Cherry Creek and Mile High Broadbands, Great Old Broads for Wilderness*