



COLORADO

**Colorado Water
Conservation Board**

Department of Natural Resources

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TO: Colorado Water Conservation Board Members

FROM: Linda Bassi, Chief, Stream & Lake Protection Section
Suzanne Sellers, Interstate, Federal & Water Information Section

DATE: July 20-21, 2016 Board Meeting

AGENDA ITEM: 17. Wild and Scenic Rivers Update

Background:

The CWCB Staff continues to work with stakeholder groups to develop resource protection methods that could serve as alternatives to federal determinations by the U.S. Bureau of Land Management (BLM) or U.S. Forest Service (USFS) that certain river segments are “suitable” for designation under the Wild and Scenic River Act. There are currently three stakeholder groups that are continuing to work on Wild and Scenic protections using the CWCB’s Wild and Scenic Rivers Fund: 1) the San Juan River basin group (separated into five different basins) (“River Protection Workgroup” or RPW); 2) the Upper Colorado River Wild and Scenic Stakeholder (UCRW&S) Group; and 3) the Lower Dolores Plan Working Group (LDPWG). Updates on these processes are set forth below along with updates on the BLM’s upcoming Royal Gorge Field Office Resource Management Plan (RMP) revision, the BLM’s recent release of the final Dominguez-Escalante (DE) National Conservation Area (NCA) Proposed Final RMP and the USFS’ Rio Grande National Forest Plan Revision. Also included is information on the formation of the Deep Creek Stakeholder Group. However, the primary topic of this memo is the BLM’s recent release of the Uncompahgre Draft RMP that includes staff recommendations for the Board’s consideration.

Staff recommendation: Staff recommends that the Board provide input on staff’s proposed conceptual comments for submittal to BLM on the Uncompahgre Draft RMP (set forth in Section G of this memo) and authorize Director James Eklund to prepare and submit a comment letter on behalf of the Board.

Discussion:

A. Upper Colorado River Wild and Scenic Stakeholder Group Update

The Upper Colorado River Wild and Scenic Stakeholder (UCRW&S) Group held its quarterly Governance Committee (GC) meeting on June 15, 2016 in Summit County. The quarterly meeting included a presentation by the BLM on its river user capacity project and updates by the BLM, USFS, and various workgroups and interest groups. The GC also discussed proposed committee charters, additional monitoring for 2016, expectations and timelines for the Fishing and the Floatboating Committees, and submitting a grant for Wild and Scenic Rivers



Fund dollars (Director Eklund subsequently approved this grant application in June 2016). The GC approved the installation and operation of a new streamflow gage during the Provisional Period, subject to available funding for the gage. The next GC meeting is scheduled for August 29, 2016 in Glenwood Springs. Additional information on the UCRW&S Group can be found at <http://www.upcowildandscenic.com>.

B. River Protection Workgroup Update (various sub-basins of the San Juan River)

The River Protection Workgroup (RPW) Steering Committee or Drafting Committee has not held a regular meeting since the January CWCB meeting; however, a subset of the Drafting Committee has been meeting to discuss specific concerns. The next meeting of the Steering Committee is scheduled for July 15, 2016 in Durango, CO.

The Drafting Committee is currently engaged in negotiations and development of consensus approaches for the protection of the five rivers, and related ORVs in the San Juan River basin, while protecting the ability of water users, within Colorado, to fully use their compact entitlements. The group has been working on resolving the remaining differences between a proposal by Trout Unlimited and an alternate proposal by the Wilderness Society and the San Juan Citizen's Alliance. The RPW Steering Committee has come to a tentative agreement-in-principle that incorporates features from both of the proposals. The Steering Committee has now shifted to the "drafting phase" of a regional legislative package with the understanding that there are still some details to be worked through. The agreement-in-principle includes pursuing instream flow (ISF) water rights, the removal of suitability, Wild and Scenic designation, and the maintenance of suitability within the five watersheds of the San Juan Basin. Additional information on the RPW can be found at: <http://ocs.fortlewis.edu/riverprotection>.

C. Lower Dolores Plan Working Group Update

The team of key stakeholders appointed by the Group's Legislative Subcommittee has met twice with attorney David Robbins to discuss, negotiate, and begin drafting revisions to the draft federal legislation that would establish a National Conservation Area (NCA) (from below McPhee Dam to Bedrock) and remove the finding of Wild and Scenic suitability from the Dolores River. This smaller group will work to eventually bring a revised draft bill back to the Legislative Committee for vetting and review. Other stakeholders continue to provide input to the Legislative Committee, both formally and informally. Additional information on the Lower Dolores Plan Working Group can be found at: <http://ocs.fortlewis.edu/drd/meetings.asp>.

D. BLM's Royal Gorge Field Office RMP Revision

The BLM's Royal Gorge Field Office issued its Final Eligibility Report in December 2015. The Final Eligibility Report lists 19 streams, rivers, or segments as eligible for inclusion in the National Wild and Scenic Rivers System (NWSRS). With this Final Eligibility Report completed, the BLM will start work on a Draft RMP for consideration and comment. The Draft Suitability report is expected to be released this fall. Upon release of the draft, it is likely that local stakeholders would seek a grant from the Wild and Scenic Alternatives Fund for the purpose of forming a stakeholder group.

E. USFS' Rio Grande National Forest Plan Revision

The USFS has recently completed the assessment phase for its upcoming Rio Grande National Forest Plan Revision. The USFS is planning to conduct wild and scenic river related inventories through a separate public engagement process concurrent with their development of alternatives during the formal forest plan development process. Depending on the timing of USFS' Wild and Scenic river inventories process, there is a possibility that local stakeholders would seek a grant from the Wild and Scenic Alternatives Fund for the purpose of forming a stakeholder group during this fiscal year.

F. Dominguez-Escalante (DE) National Conservation Area (NCA) Proposed RMP

In July 2013, the CWCB drafted a letter to the BLM expressing opposition to finding Cottonwood Creek suitable as proposed in the Draft DENCA RMP/EIS. On July 1, 2016, the BLM's Grand Junction Field Office published its proposed Final DENCA RMP/EIS. The BLM did not change the recommendation for suitability for Cottonwood Creek. However, in response to the CWCB's concerns, the BLM included the following language:

The BLM determination that Cottonwood Creek is suitable is a preliminary administrative determination subject to further review by the U.S. Department of the Interior. At this time, the BLM will not forward this determination to the Secretary, Congress, or the President for further review and action. If the BLM is able to obtain an alternative form of flow protection to support the vegetation outstandingly remarkable value (ORV), the BLM will recommend that action not be taken on the suitability determination and will change the determination to "not suitable" during the next available land use plan amendment process. Limits on allowable uses as directed in the National Conservation Area designation legislation, as well as management actions designed to protect riparian vegetation (see Lines 73-89) are sufficient to address land uses that may threaten the vegetation ORV.

At the May 2014 CWCB meeting, with Cottonwood Creek in mind, CWCB staff and Roy Smith of BLM staff presented a proposed approach to using the state's Instream Flow Program to provide direct protection of riparian vegetation ORVs.

G. Uncompahgre Field Office Draft Resource Management Plan

On June 3, 2016, the BLM's Uncompahgre Field Office (UFO) published its Draft RMP. Of the 28 stream segments assessed, the draft RMP's preferred alternative proposes determining 16 stream segments as suitable and 12 as not suitable. The suitable segments lie within the Gunnison, San Miguel, and Dolores River basins and are shown in Figures 1, 2 and 3 and are summarized in Table 1. Most of the suitable segments have existing or proposed instream flow (ISF) water rights which are summarized in Table 2.

Comments on the draft RMP are due September 1, 2016. In preparation for this deadline, Staff has prepared the following conceptual approach that can be incorporated in a comment letter prior to that date. However, there is a possibility that the BLM will extend the deadline. If the deadline is extended, Staff will coordinate with BLM staff and present staff's recommendations and a draft comment letter to the Board at its September meeting for consideration.

Gunnison Basin:

While the Gunnison Basin Wild & Scenic Stakeholder Group came to a consensus recommendation that many of the segments in their basin should be considered "not suitable," the Group did not reach consensus on the suitability of the three tributary segments being proposed as suitable by the BLM. Staff notes that there are no existing water rights within these reaches; however, there are several existing water rights upstream on USFS land. Two of the three segments being proposed for suitability have existing ISF water rights. The draft RMP describes the extent to which those existing ISF water rights protect the ORVs, stating that the Roubideau Creek ISF "provides some protection to sustain the ORVs" and describing the Potter Creek ISF as "helping to sustain the Vegetation ORV." The CWCB currently does not hold any ISF water rights on Monitor Creek, the third creek proposed to be found suitable. Staff anticipates receiving ISF recommendations to address the vegetation ORVs on Monitor and Potter Creeks, potentially as soon as January 2017.

San Miguel and Dolores Basins:

In lieu of forming a stakeholder group, the BLM and local stakeholders opted to use a subgroup of its Southwest Resource Advisory Council (SW RAC). The SW RAC subgroup conducted a series of public meetings, between November 2010 and January 2011, in various towns within the subject water basins to provide information and receive stakeholder input. After collecting public comments and information on the eligible river segments, the SW RAC voted to recommend eight segments in the San Miguel basin and five segments in the Dolores Basin be found suitable. These recommendations were incorporated into the BLM's preferred alternative D.

With the exception of San Miguel River Segment 3 and a portion of Beaver Creek, all of the segments proposed for suitability in the San Miguel and Dolores basins have existing or proposed ISF water rights. The draft RMP describes the extent to which the existing ISF water rights protect the ORVs, which for most reaches, primarily describes the ISFs as "providing some protection" of the ORVs. Preliminary discussions with Roy Smith indicate that BLM hopes to coordinate with the CWCB on providing additional protection of the identified ORVs through the ISF Program.

Staff notes that there are many existing water rights within and above the proposed suitable reaches on both private and public land. Also, the Southwest Roundtable's Basin Implementation Plan (BIP) indicates that the municipal and industrial (M&I) demand is expected to be met by investigating means of providing additional water, firming of existing supplies, and enlargement of distribution systems, with many of the necessary water rights already decreed. Additionally, the BIP identifies permitting as one of the primary constraints and a source of uncertainty in developing these projects.

Recommended Approach:

Staff recommends that in its comment letter, the CWCB express its general opposition to suitability while also acknowledging its long-term partnership with the BLM in finding working solutions to collaboratively manage and protect Colorado's rivers. Specific concerns with the finding of suitability and/or designation of any segments as a Wild and Scenic river are set forth below:

1. Federal Reserved Water Rights

Historically, the CWCB has taken the position that federal reserved water rights are not the best method for protecting flow-related ORVs in river corridors. Rather, the CWCB's ISF Program can provide adequate protection of fish and vegetation flow-related values in the subject stream segments. Staff notes that in recent decisions, the BLM has taken into account its long-standing working relationship with the CWCB and use of the state's ISF Program. As discussed above, in the Final DENCA RMP, the BLM determined that one segment of Cottonwood Creek would be managed as suitable for Wild and Scenic designation. The BLM qualified that finding with a recommendation that action not be taken on the suitability determination and stated that the BLM will change the determination to "not suitable" during the next available land use plan amendment process, provided that an alternative flow protection method be put in place for the vegetation ORV. More information is available on page 3 in staff's summary of the Final DENCA RMP.

Staff recommends that the CWCB request that: (1) the BLM find each of the stream segments "not suitable" where existing ISF water rights adequately protect the flow-related ORVs; (2) the BLM work with the CWCB to seek increases on existing ISF water rights where BLM finds that the fish and vegetation ORVs are not adequately protected; and (3) the BLM include language in its final Suitability Report similar to that used for Cottonwood Creek for those segments.

For San Miguel Segments 1, 2 and 3, Lower Dolores, and Dolores Segments 1a and 2, staff recommends that the CWCB request that the BLM seek any recreational float boating protections by coordinating with local governmental entities on obtaining a recreational in-channel diversion water right (RICD) rather than obtaining a federal reserved water right. Staff acknowledges that whitewater structures would be required to obtain a RICD right; however, the BIP does indicate that local water users are considering a RICD as an Identified Project or Process (IPP) for the San Miguel River. Staff also recommends that the CWCB request that the BLM analyze and consider the totality of existing senior water rights that may already pull enough water through the subject reaches to satisfy the recreational ORV.

2. Federal Nexus

Sections 7(a) and (b) of 36 CFR 297 indicate that any water projects with a federal nexus that exist in, above or below a designated Wild and Scenic reach could be prohibited through the consultation process if they would "invade the area or unreasonably diminish the ORV." If a segment were designated as Wild and Scenic, this provision would apply to all existing, new or enlarged structures (regardless of water right status) on federal land, using federal funds or requiring a 404 permit from the Corps of Engineers.

While the current process is only a step towards Wild and Scenic designation, this same provision would apply to structures on BLM lands at the suitability stage. Upon a finding of suitability, the BLM would be required to manage the segments as if they were designated when reviewing proposed actions on BLM land. For example, the construction of reservoirs or enlargement of reservoirs for the Montrose County Firming Project could be impacted by a finding of suitability. For these reasons, suitability may impede the state's objectives of: 1) fully using its entitlements under its compacts or decrees; and 2) promoting maximum utilization of waters of the state.

To address these concerns, Staff recommends that the CWCB request that the segments currently classified as "wild" or "scenic" on which existing water rights are located be changed to a "recreational" classification. Staff also recommends that the CWCB request that the BLM review the current list of IPPs and find any segments that would prevent the development of an IPP on BLM land not suitable.

Further, Staff recommends that the CWCB express its concern to the BLM about nominating any segment for future designation that could prevent the construction or enlargement of new water structures or reservoirs when triggering a federal nexus.

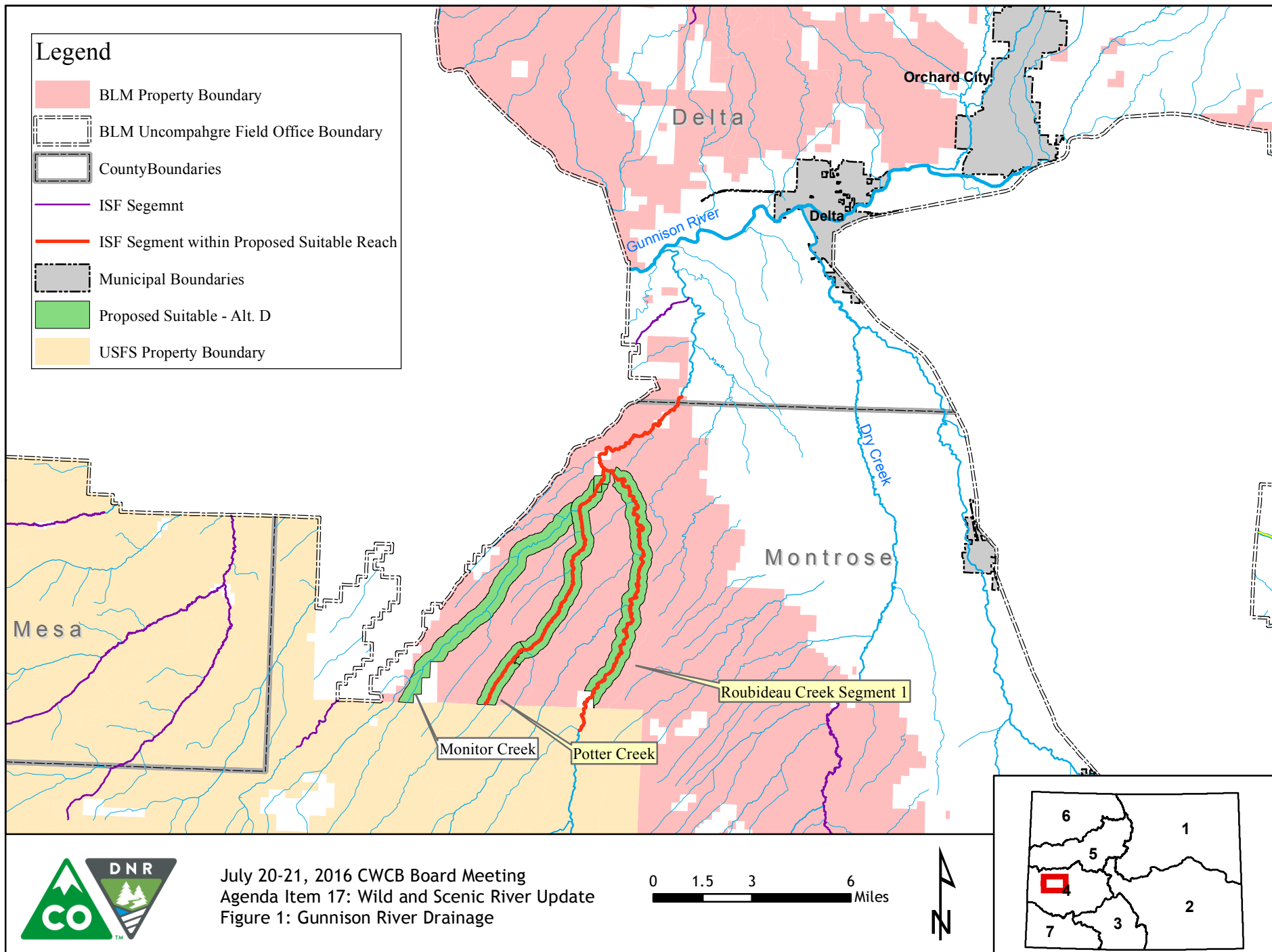
3. Other

Staff also recommends requesting that the BLM to update information in the draft Suitability Report, including: (1) in the "Water Rights and Uses" sections, updating references to and information from SWSI 2004 to include SWSI 2010, the Southwest Basin Roundtable's BIP, and Colorado's Water Plan; and (2) updating the status of the San Miguel River ISF water right (decreed in 2013) and the Dolores River ISF water right below the confluence with the San Miguel River (application pending in water court).

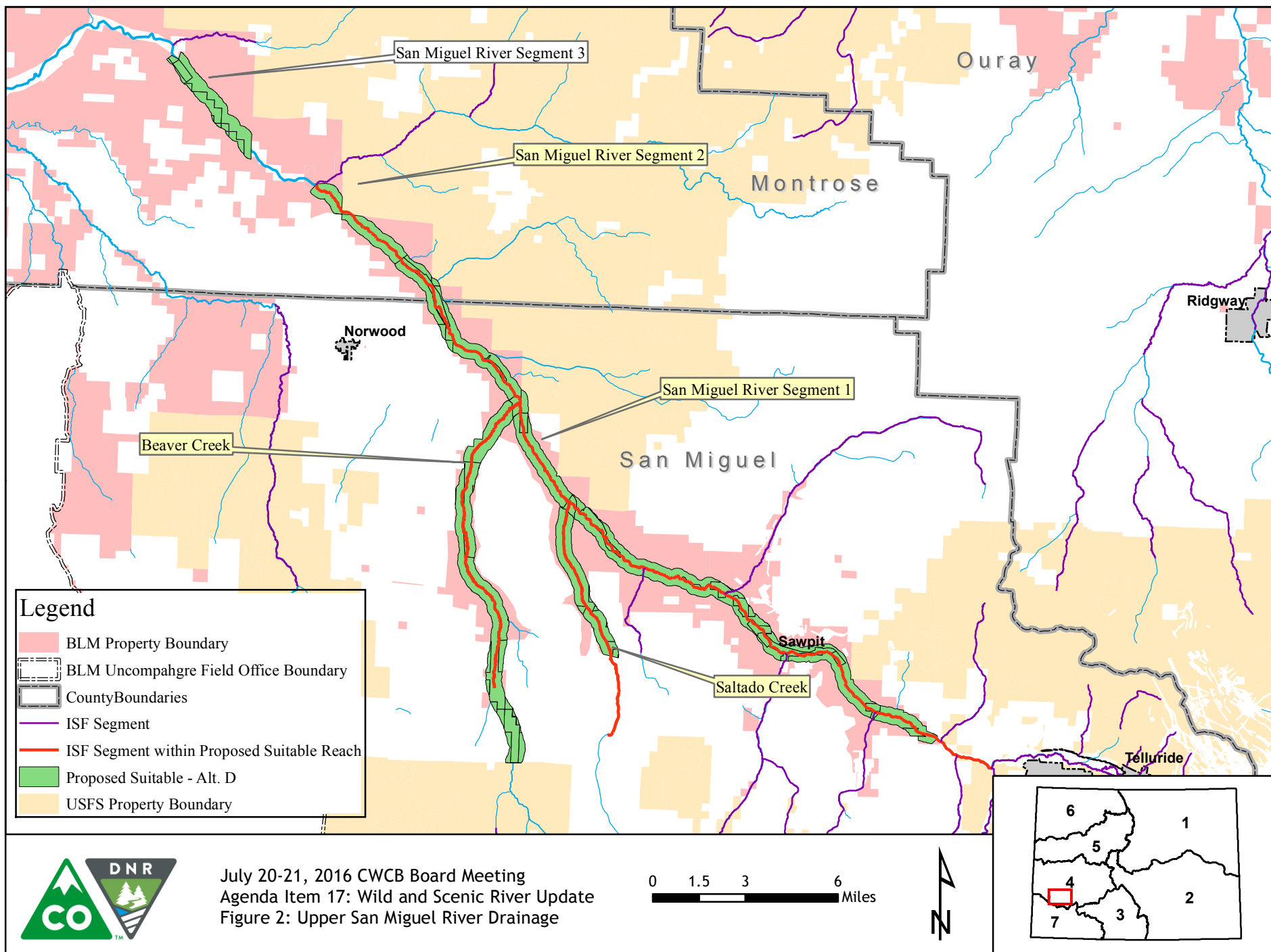
H. Formation of Deep Creek Stakeholder Group

American Rivers and the Eagle River Watershed Council have been working to convene a stakeholder group to further discuss and engage in a process to bring about the designation of Deep Creek as a Wild and Scenic River. The subject reach of Deep Creek is approximately 15 miles, with the upper

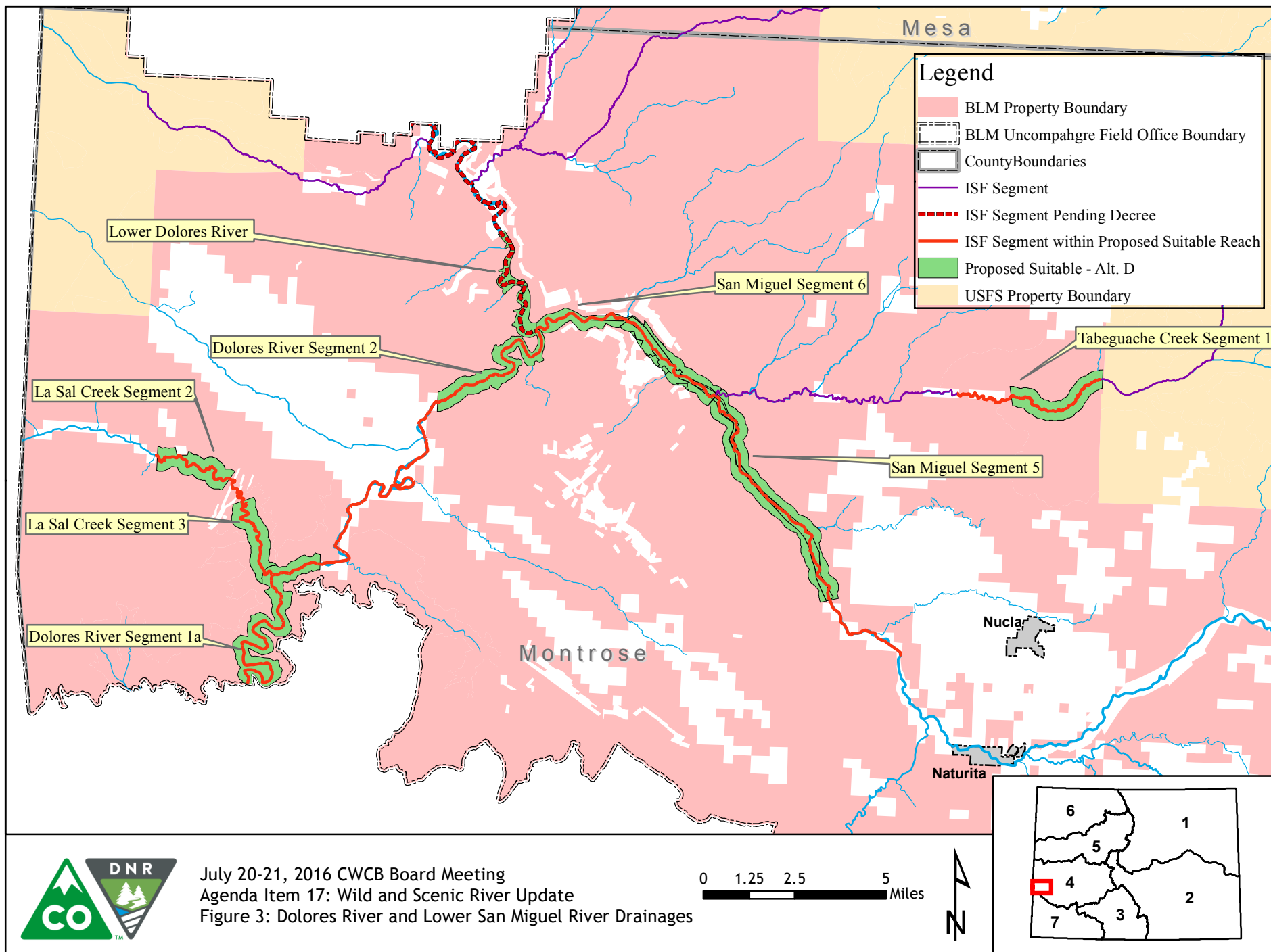
10.77 miles flowing through USFS land, and the remainder flowing through BLM land. The Final Record of Decision finding the reach suitable for Wild and Scenic designation was issued by USFS and BLM on July 8, 2015. The CWCB holds an instream flow water right on the subject reach of Deep Creek that extends about five miles past the downstream terminus of the reach. On June 9, 2016, the first Deep Creek stakeholder group meeting was held in Gypsum, CO, and was attended by a staff member for Sen. Gardner, representatives of the Town of Gypsum, Eagle County, grazing allotment holders, the USFS, the BLM, CPW, CWCB, American Rivers, the Eagle River Watershed Council, the Colorado River Water Conservation District, and the Middle Colorado Watershed Council, and by private individuals interested in the process. The group discussed the process of developing proposed legislation to designate Deep Creek as Wild and Scenic, looked at potential boundaries of the Wild and Scenic corridor, identified concerns with a Wild and Scenic designation, and discussed pursuing stream flow protection for the subject reaches through the state's ISF Program rather than under a federal reserved water right. The USFS and BLM representatives answered questions about potential impacts of such a designation. The group plans to meet again later this summer. CWCB staff will participate in this process. This stakeholder group has not requested a grant from the CWCB's Wild and Scenic Rivers Fund because the group is not considering alternatives to designation.



July 20-21, 2016 CWCB Board Meeting
 Agenda Item 17: Wild and Scenic River Update
 Figure 1: Gunnison River Drainage



July 20-21, 2016 CWCB Board Meeting
 Agenda Item 17: Wild and Scenic River Update
 Figure 2: Upper San Miguel River Drainage



July 20-21, 2016 CWCB Board Meeting
 Agenda Item 17: Wild and Scenic River Update
 Figure 3: Dolores River and Lower San Miguel River Drainages

Table 1. Wild and Scenic Rivers Suitability Determination by BLM Uncompahgre Field Office

Water Shed	Segment	Segment Length	W&S Class	ORVs	Stakeholder Process	Stakeholder Group Outcome
Lower Gunnison	Monitor Creek	9.4 miles	Wild	Fish, Vegetation	Gunnison Basin Wild & Scenic Stakeholder Group	While the stakeholder group came to consensus on many of the segments considered, they did not form a consensus on suitability for these segments.
Lower Gunnison	Potter Creek (ISF)	9.8 miles	Wild	Fish, Vegetation		
Lower Gunnison	Roubideau Creek Segment 1 (ISF)	10 miles	Wild	Recreational, Wildlife, Cultural, Vegetation		
San Miguel	Beaver Creek* (ISF)	14.2 miles	Recreational	Vegetation	Southwest Resource Advisory Council (SW RAC)	After collecting public comments on eligible river segments, the SW RAC voted to recommend that these segments be found "suitable".
San Miguel	Saltado Creek (ISF)	4.1 miles	Wild	Vegetation		
San Miguel	San Miguel River Segment 1 (ISF)	17.3 miles	Recreational	Scenic, Recreational (including float boating), Wildlife, Historic, Vegetation, Paleontology		
San Miguel	San Miguel River Segment 2 (ISF)	3.6 miles	Wild	Scenic, Recreational (including float boating), Wildlife, Vegetation		
San Miguel	San Miguel River Segment 3	4.5 miles	Recreational	Recreational (including float boating), Fish, Wildlife, Vegetation		
San Miguel	San Miguel River Segment 5 (ISF)	1.3 miles	Recreational	Recreational, Fish, Historic, Vegetation		
San Miguel	San Miguel River Segment 6 (ISF)	2.1 miles	Recreational	Recreational, Fish, Historic, Vegetation		
San Miguel	Tabeguache Creek Segment 1 (ISF)	3.4 miles	Wild	Vegetation		

Notes:

ISF = Instream Flow BLM = Bureau of Land Management ORV = Outstanding Remarkable Value SW RAC = Southwest Resource Advisory Council UFO = BLM Uncompahgre Field Office
W&S = Wild and Scenic

Table 1. Wild and Scenic Rivers Suitability Determination by BLM Uncompahgre Field Office

Water Shed	Segment	Segment Length	W&S Class	ORVs	Stakeholder Process	Stakeholder Group Outcome
Dolores	Lower Dolores River (ISF Pending in Water Court)	4.2 miles	Scenic	Scenic, Recreational (including float boating), Geologic, Fish, Wildlife	Southwest Resource Advisory Council (SW RAC)	After collecting public comments on eligible river segments, the SW RAC voted to recommend that these segments be found “suitable”.
Dolores	Dolores River Segment 1a (ISF)	8.7 miles	Wild	Recreation (including float boating), Scenery, Fish, Wildlife, Geology, Ecology, Archaeology		
Dolores	Dolores River Segment 2 (ISF)	5.3 miles	Recreational	Scenic, Recreational (including float boating), Geologic, Fish, Wildlife, Vegetation		
Dolores	La Sal Creek Segment 2 (ISF)	3.3 miles	Recreational	Fish, Vegetation		
Dolores	La Sal Creek Segment 3 (ISF)	3.4 miles	Wild	Scenic, Recreational, Fish, Cultural, Vegetation		
Total		104.6 miles -100% BLM-administered land or adjacent to BLM-administered land**				

*Upper portion of Beaver Creek segment does not have ISF water right.

**BLM Staff indicates that private landowners are supportive of being included in suitable segments.

Notes:

ISF = Instream Flow BLM = Bureau of Land Management ORV = Outstanding Remarkable Value SW RAC = Southwest Resource Advisory Council UFO = BLM Uncompahgre Field Office
W&S = Wild and Scenic

Table 2


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Department of Natural Resources

Instream Flow Tabulation - Streams

Water Division 4

Case Number	Stream	Watershed	County	Upper Terminus	Lower Terminus	Length (miles)	USGS QUADS	Amount(dates) (CFS)	Approp Date
4-93CW268	Beaver Creek	San Miguel	San Miguel	confl Goat Creek at lat 37 58 19N long 108 11 46W	confl San Miguel River at lat 38 06 22N long 108 11 13W	10.60	Beaver Park Gurley Canyon	5 (5/1 - 6/30) 2.5 (7/1 - 4/30)	11/9/1993
4-15CW3111	Dolores River*	Lower Dolores	Montrose Mesa	confl San Miguel River at lat 38 22 47N long 108 48 13W	bridge located at lat 38 40 05N long 108 57 55W	33.15	Gateway Juanita Arch Red Canyon Roc Creek	200 (3/16 - 4/14) 900 (4/15 - 6/14) 400 (6/15 - 7/15) 200 (7/16 - 8/14) 100 (8/15 - 3/15)	1/28/2014
4-02CW271	La Sal Creek	Upper Dolores	Montrose	confl Sharp Canyon Creek at lat 38 19 26N long 108 59 32W	confl Dolores River at lat 38 16 43N long 108 55 51W	6.00	Paradox	3 (12/15 - 3/14) 5.1 (3/15 - 6/14) 1.2 (6/15 - 12/14)	1/23/2002
4-04CW161	Potter Creek	Lower Gunnison	Montrose Delta	BLM-USFS boundary at lat 38 31 58N long 108 15 23W	confl Roubideau Creek at lat 38 38 18N long 108 11 40W	9.00	Camel Back Cottonwood Basin Roubideau	1.8 (3/1 - 3/31) 4 (4/1 - 6/15) 1.8 (6/16 - 7/31) 1.4 (8/1 - 2/29)	1/28/2004
4-04CW162	Roubideau Creek	Lower Gunnison	Montrose Delta	confl Moore Creek at lat 38 31 22N long 108 12 12W	BLM boundary at lat 38 40 18N long 108 09 09W	14.40	Camel Back Roubideau	5 (3/1 - 3/31) 21 (4/1 - 6/15) 5 (6/16 - 7/31) 1.9 (8/1 - 2/29)	1/28/2004

Instream Flow Tabulation - Water Division 4

Case Number	Stream	Watershed	County	Upper Terminus	Lower Terminus	Length (miles)	USGS QUADS	Amount(dates) (CFS)	Approp Date
4-93CW267	Saltado Creek	San Miguel	San Miguel	confl unnamed tributary at lat 37 57 07N long 108 07 40W	confl San Miguel River in lat 38 03 38N long 108 09 22W	8.30	Beaver Park Gurley Canyon Little Cone	2 (5/1 - 6/30) 1 (7/1 - 4/30)	11/9/1993
4-84CW429	San Miguel River	San Miguel	San Miguel	confl S Fk San Miguel River at lat 37 56 31N long 107 53 59W	conf Fall Creek at lat 37 59 35N long 108 01 27W	8.40	Gray Head Little Cone	20 (1/1 - 12/31)	7/13/1984
4-02CW277	San Miguel River	San Miguel	San Miguel Montrose	confl Fall Creek at lat 37 59 35N long 108 01 27W	pt immed u/s of confl Horsefly Cr at lat 38 12 19N long 108 18 44W	24.10	Gurley Canyon Little Cone Norwood Placerville Sanborn Park	61 (10/15 - 4/30) 93 (5/1 - 10/14)	1/23/2002
4-11CW129	San Miguel River	San Miguel	Montrose	confl Calamity Draw at lat 38 15 24N long 108 36 49W	confl Dolores River at lat 38 22 47N long 108 48 13W	17.24	Atkinson Creek Nucla Red Canyon Uravan	115 (3/1 - 4/14) 325 (4/15 - 6/14) 170 (6/15 - 7/31) 115 (8/1 - 8/31) 80 (9/1 - 2/29)	1/25/2011
4-10CW187	Tabeguache Creek	San Miguel	Montrose	confl Fortyseven Creek at lat 38 22 10N long 108 31 5W	hdgt Templeton Ditch at lat 38 21 42N long 108 35 25W	5.40	Nucla Uravan	1.6 (12/1 - 3/31) 4.75 (4/1 - 6/30) 1.9 (7/1 - 11/30)	1/26/2010

Totals for Water Division 4

Total # of Stream Miles = 136.59

Total # of Appropriations = 10

(Totals do not include donated/acquired water rights)

Instream Flow Tabulation - Water Division 7

Case Number	Stream	Watershed	County	Upper Terminus	Lower Terminus	Length (miles)	USGS QUADS	Amount(dates) (CFS)	Approp Date
7-75W1346	Dolores River	Lower Dolores Upper Dolores	San Miguel Montrose Montezuma Dolores	McPhee Res Dam in SW S1 T38N R16W NMPM	confl San Miguel River in SE S25 T48N R18W NMPM	105.00	Anderson Mesa Bull Canyon Cahone Davis Mesa Doe Canyon Hamm Canyon Horse Range Mesa Paradox Red Canyon Secret Canyon The Glade Trimble Point Yellow Jacket	78 (1/1 - 12/31)	5/1/1975

Totals for Water Division 7	Total # of Stream Miles =	105
	Total # of Appropriations =	1
<i>(Totals do not include donated/acquired water rights)</i>		

Report Totals	Total # of Stream Miles =	241.59
	Total # of Appropriations =	11
<i>(Totals do not include donated/acquired water rights)</i>		