September 18, 2018

Colorado Water Conservation Board (CWCB)
Brent Newman, Interstate, Federal and Water Information Section Chief
1313 Sherman St., Room 718
Denver, CO 80203

Russell George, CWCB Mainstem Representative, Colorado Basin Roundtable (CBRT) Member

Subject: Agenda Item 13, Colorado Basin Drought Contingency Planning;
Support for the Colorado River District and Southwestern Conservation District’s Six
Principles to govern Demand Management program exploration

The CBRT’s Basin Implementation Plan identifies these two goals (among others) as vital for the basin’s water and economic future: “Ensure sufficient Lake Powell water levels for uninterrupted hydropower production” and “Maintain interstate compact deliveries to Lake Powell.”

It also cites the importance of irrigated agriculture to western Colorado and calls out the potential for vast buy and dry as a threat. Also, the CBRT supported the Conceptual Framework in Colorado’s Water Plan, which addresses the protection of current water uses as well as environmental, recreational and other values important to the West Slope and all of Colorado in the face of new water development -- or to prevent involuntary curtailment.

With that said, I write on behalf of the CBRT to laud the CWCB’s extensive efforts to examine how “temporary, voluntary and compensated” conserved consumptive use (Demand Management) could be generated to support Lake Powell and proactively avert Colorado River Compact compliance measures.

The CBRT supports the joint September 17, 2018 letter and resolution in your possession from the Colorado River District and the Southwestern Conservation District. The documents spell out six principles that would govern the exploration or implementation of a Demand Management program while protecting the interests of the West Slope and all of Colorado. Furthermore, as the CWCB continues its work on a Demand Management program, we urge that the Roundtables and the Interbasin Compact Committee continue to be engaged in the work to promote transparency and stakeholder awareness.

Sincerely yours,

Jim Pokrandt
Chair, Colorado Basin Roundtable
September 18, 2018

From:
Kathleen Curry, Chair
Gunnison Basin Round Table
C/O Upper Gunnison River Water Conservancy District
210 W. Spencer Ave., Ste. B
Gunnison, CO 81230

To:
Brent Newman, Section Chief, Interstate, Federal & Water Information Section
Steve Anderson, Gunnison Basin Director
Colorado Water Conservation Board of Directors

Dear Mr. Newman, Mr. Anderson, and Members of the Board,

The Gunnison Basin Round Table (GBRT) would like to provide the Board with comments regarding Agenda Item 13, Drought Contingency Planning, to be discussed during the September 19th meeting of the Board. On July 16th of this year Brent Newman of your staff briefed the GBRT regarding the board’s efforts to evaluate and develop a demand management program for the State that could be used to forestall a Colorado River compact shortage. He assured us that such a program would be limited to voluntary, compensated curtailments of water use. The GBRT decided to provide comments since the concept of “pivoting” to a non-voluntary program was identified as an option in a recent staff memo to the board.

The GBRT supports the language in the resolution the Colorado River Water Conservation District and the Southwest Water Conservation District provided today to the CWCB staff and Board. This resolution accurately represents the position of the GBRT regarding the proposed storage pool legislation as well as the need to limit any future demand management program to voluntary, compensated curtailments of water use.

The GBRT also wants to highlight the importance of including the Basin Roundtables in future efforts to develop policy and an eventual program. We request that we be notified of future opportunities to provide input and appreciate the previous efforts of staff to keep us informed. We look forward to working with the CWCB and other entities in the future on these important issues.

Kathleen Curry, Chair
Gunnison Basin Round Table
C/O the UGRWCD
Gunnison, CO 81230
Cell 970-209-5537
Home 970-641-0699
September 18, 2018
Colorado Water Conservation Board
VIA Email: Andrew.rickert@state.co.us
RE: Drought Management Plan

Dear Chairman Yahn and Board Members:

Club 20 is a coalition of individuals, businesses, tribes and local governments in Colorado's 22 western counties. Club 20 recognizes water issues as some of the most important facing our state, particularly during this year of unprecedented low flows in some of our member counties. Without adequate water supplies for our Western Colorado communities and agricultural producers, the economy of our state cannot prosper.

Club 20 recognizes the important role that the Colorado River plays in serving not only Colorado, but the other states in the Colorado River Basin, as well as municipalities and agriculture outside the Colorado River Basin in the Front Range of Colorado. And, of course, Club 20 is well aware of the obligations, and the complexity of the operations of the Colorado River, under the Law of the River. The hydrology of 2018 has increased the attention of all stakeholders in the Colorado River on conservation and other drought management efforts. However, we urge the Board not to be precipitous in making decisions or embracing drought management plans without full vetting by water users, especially those in Western Colorado.

It is our understanding that the CWCB will be addressing aspects of drought management and federal legislation during its meeting in Steamboat Springs. Club 20 is concerned that the Board will take action to adopt policy, support recommendations, or otherwise undertake commitments before the options and policies have been appropriately vetted with the public, and in particular, with water users most directly affected. Club 20 urges the Board to delay any action on proposed policies, agreements, or other documents pertaining to drought management and any associated federal legislation until more public input can be provided.

Club 20 believes that any drought management policy that includes non-exercise of water rights must be based upon voluntary curtailment, must be compensated, and must include curtailment of diversions of water for use by Colorado River water users on the Front Range, as well as water users on the Western Slope. Most importantly, the process for arriving at any drought management plan must be transparent and the options or proposals disclosed for public input prior to policies being adopted or agreements being entered into. Club 20 appreciates the opportunity to provide comments and looks forward to participating in further discussions of these important issues.

Thank you for your consideration and the opportunity to provide comment.

Sincerely,

Christian Reece and Cindy Dozier
Executive Director Club 20 Board Chair, Hinsdale County Commissioner