

South Metro Water Supply Authority

July 21, 2010

Ray Alvarado

Water Information Section Chief

Colorado Water Conservation Board

1580 Logan St. #200

Denver, Colorado 80201

Dear Mr. Alvarado,

The South Metro Water Supply Authority wishes to make the following comments on the draft Phase 1 Colorado River Water Availability Study. The study, a political compromise at best, is flawed on several accounts. Many comments by others adequately address these shortcomings. We particularly agree with those of Parker Water & Sanitation District and Douglas County.

The Bureau of Reclamation, during the Colorado River shortage negotiations, adequately addressed water availability in the upper basin. This unbiased work, based on historic and prehistoric hydrologic conditions, showed less than 1% chance of the upper basin failing to comply with the Compact even under the worst of conditions. The study at issue here purports to analyze water availability based on "climate change" to the exclusion of other more traditional analytical methods. Quite frankly, the conclusions are not very useful and present little opportunity for water managers and policymakers to adequately plan for the full development of Colorado's compact allocations.

The importance to other States in the upper basin is that this study could be used to allege that New Mexico & Utah have over used their allocations and Wyoming, like Colorado, may have severely diminished water availability in their future. Conclusions such as "zero to 500,000 acre feet available" very well be used to thwart future use of upper basin water allocations.

The real fear is that a study of this nature will be used to administer water rights in the Colorado Basin within the State on a 10 year moving average. Such premature administration would neuter the usefulness of the Colorado River Storage Projects (specifically designed to provide insurance for upper basin water use) and cast doubt on the ability of water users to pay for future projects given the allegations of diminished water needed to provide a source of revenue.

This study needs to be left in “draft” and the State needs to move on to more pressing issues such as the development of projects necessary to meet our future water needs. The State has an adequate inventory of projects identified through the State Wide Water Supply Initiative. I believe it has always been the intent of the CWCB to move forward on these projects.

Sincerely,

Rod Kuharich

Executive Director

South Metro Water Supply Authority