



Upper Gunnison River Water Conservancy District

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July 19, 2010

***Transmitted by electronic mail
Original by U.S. Mail***

Jennifer Gimbel, Director
Colorado Water Conservation Board
1313 Sherman Street, Room 721
Denver, Colorado 80203
jennifer.gimbel@state.co.us

Re: Comments on the Colorado River Water Availability Study, Phase I Report

Dear Jennifer,

On behalf of the Board of Directors of the Upper Gunnison River Water Conservancy District, I am submitting the following comments on the report entitled "*Colorado River Water Availability Study – Phase I Report – Draft Findings*, March 22, 2010". Our greatest concern is the incorrect values for the water available to meet future demands in the Upper Gunnison Basin reported in the study. The incorrect values are the result of failing to account for the Aspinall Unit direct flow hydropower rights in the water availability analysis. There are numerous tables and figures in the report and appendices that need to be revised to reflect the corrected values.

The Aspinall Unit direct flow hydropower water rights are very large, as shown in the following table:

Description	Amount (cfs)	Appropriation Date
Crystal Power Plant	3,000	November 13, 1957
Morrow Point Power Plant	2,500	November 13, 1957
	2,950	February 2, 1959
Blue Mesa Power Plant	2,500	November 13, 1957

The District's consulting engineer, Jim Slattery, worked with Erin Wilson, consulting engineer for the State of Colorado, to revise the Colorado Decision Support System StateMod model to include the Aspinall Unit direct flow hydropower water rights. Nevertheless, the District's Board of Directors wishes to make a record of this concern to assure that it will be reflected in the final report.

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The estimated water available to meet future demands in the Upper Gunnison River Basin decreased significantly after the Aspinall Unit direct flow water rights were incorporated into the StateMod model. The water available to meet future demands changed from the currently reported annual average value of 330,000 acre-feet per year to less than 7,000 acre-feet per year, with the majority of the years reflecting nothing available. The Aspinall Unit storage rights and direct flow hydropower rights control the entire inflow to the Aspinall Unit except in a few months in extremely high runoff years when the Bureau of Reclamation inadvertently underestimates the forecasted inflow into the Aspinall Unit.

During our review we identified the need to improve the storage targets for Blue Mesa Reservoir. Jim Slattery and Erin Wilson worked with the Bureau of Reclamation to refine the storage targets used in the StateMod model. The change in the storage targets did not have a significant impact on the model results, but are necessary to better represent the operation of Blue Mesa Reservoir.

Finally, the District Board wishes to express concern, as have other reviewers, that the wide range of values in the conclusion (0-1 million acre-feet) greatly diminishes the value of the study as a planning tool on both State and local levels. At the least, some degree of probability analysis for the various alternatives would be helpful.

The District Board appreciates the hard work by Ray Alvarado and his consultant team, both in preparing the report and in making numerous thoughtful presentations to interested parties throughout the state. In the interest of producing the most accurate study possible, the District is prepared to continue to offer the services of its consulting engineer to assist the study team on issues unique to the Gunnison Basin, where his many years' experience can be valuable in evaluating model results. The Board also wishes to thank the Colorado Water Conservation Board for undertaking this daunting task, so necessary for wise planning for Colorado's future Colorado River water development.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JH McClow', with a large, stylized loop at the end.

John H. McClow, General Counsel

cc: Ray Alvarado (*by electronic mail*)