

July 20, 2010

Mr. Ray Alvarado
Water Information Section Chief
Colorado Water Conservation Board
1580 Logan St. Ste 200
Denver, CO 80203

Dear Mr. Alvarado,

The Douglas County Board of County Commissioners (BCC) would like to take this opportunity to officially comment on the draft Phase I Colorado River Water Availability Study (Study) released by your office on March 22, 2010.

It is our opinion that, while the study may offer a valid scientific analysis of the prehistoric and historic hydrologic conditions of the Colorado River Basin (Basin), these analyses were not given fair and equal treatment with the subsequent climate change analyses addressing potential impacts on future water availability. As such, the overall conclusions of the study which highlight climate change, to the exclusion of the more traditional water supply evaluation techniques using historic recorded data, will not serve water managers well in our existing and future plans to perfect the state's rightful and full compact entitlement.

The BCC believes that the methodology used to evaluate the climate-adjusted water availability within the Basin is flawed and needs to be addressed. At numerous places throughout the Study, the limitations of climate change models for use in Colorado's mountainous terrain, and limitations on the subsequent analyses extrapolated from the climate change models, are noted but are then later discounted by the authors when the conclusions to the Study are provided. It is our recommendation that the climate change information be removed completely from the Study, or be reviewed and approved by an independent panel of qualified professionals to direct its methods and conclusions prior to inclusion in the results of the Study.

We realize the critical importance of the Study to assist Colorado in perfecting its rightful and full compact entitlement, and applaud you for the effort. It is necessary, however, that the conclusions of the Study be rooted in scientifically defensible and verifiable data. If CWCB approves and finalizes the Phase I report without providing such scientific vetting of the validity of the conclusions of the study, Colorado may appear to have forfeited its remaining Compact entitlement, while it should be vigorously defending its rights to this entitlement. This study would also benefit from recommendations of means to maximize the beneficial use of Colorado River entitlement water, given the findings of this study, such as additional storage, improved efficiency of irrigation, and water banking.

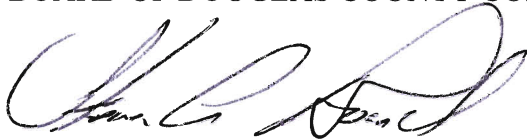
Jack A. Hilbert
Commissioner District I

Steven A. Board
Commissioner District II

Jill E. Repella
Commissioner District III

We greatly appreciate your consideration of our comments.

Sincerely,
BOARD OF DOUGLAS COUNTY COMMISSIONERS



Steven A. Boand, Chair