



Board of County Commissioners

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District No. 1

J. Kevin McCasky
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July 21, 2010

Ray Alvarado
Colorado Water Conservation Board
1580 Logan Street, Suite 200
Denver, Colorado 80203

Re: Comments of the Draft Colorado River Water Availability Study Report

Dear Mr. Alvarado:

I am submitting my comments in response to the Draft Colorado River Water Availability Study Report.

First and foremost, I respectfully request a delay in issuing any further findings or conclusions of the draft study until numerous engineering and technical experts have an opportunity to evaluate the draft study in detail. Jefferson County's staff review has raised concerns with the application of the Global Climate Model (GCM), the failure to apply the Colorado River Basin's unique attributes, such as mountain terrain, temperature, and precipitation, and the incorporation of un-vetted assumptions regarding future operating and management practices. In addition, while the estimates of water available for future consumptive use overlap on the upper end of previous studies, the lower end of the range indicates there will be limited water for future development in Colorado. Given such a large range of values, and margin of errors associated with the GCM, this report should have several disclaimers related to the assumptions that lead to the lower end of the range. This report has the potential to provide useful data to be used in the decision process in land use cases throughout Colorado, however, the assumptions used in the GCM should be revisited and the eight refinements in the report (page VIII) should be addressed prior to the next draft.

Further, I request independent peer review by professionals knowledgeable of Colorado's environment, as well as incorporation of a public review, be an integral part of the re-evaluation.

Whether intended or not, this study has the potential to concede Colorado's water rights based on scientifically unfounded manipulations of available hydrologic and climatic data. Colorado communities must be involved in a fair and accurate study to ensure Colorado's full Compact entitlement.

Sincerely,

J. Kevin McCasky
Commissioner

JKM/mm

