



File Code: 2500

Date: July 30, 2010

Ray Alvarado
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Colorado Water Conservation Board
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Dear Mr. Alvarado:

Thank you for the opportunity to provide comments on the Colorado River Water Availability Study (CRWAS). The Phase I Report is an ambitious undertaking and we appreciate this effort to address the complexity of the issues that are being considered as the water community in Colorado grapples with the likely future scenarios for water in the state.

We have comments on two issues for your consideration as you revise Phase I of this study, and prepare for Phase II.

1. **Non Consumptive Uses**

As noted on page 1 of the executive summary: "...Phase I (the subject of this report) presenting a water availability assessment based only on existing levels of water use. For Phase I, water uses (also referred to as water demands) were limited to current levels of water demands served by water rights that are currently being used ("perfected" or "absolute" water rights). Phase I is also restricted to interpretations of current operating and management practices for water diversion, storage and conveyance facilities. Assessments of water availability to meet future water needs are reserved for Phase II of the CRWAS."

We have a concern that a broad range of environmental, recreational, and other non-consumptive uses on public lands are currently met through natural or regulated flows that are not protected by water rights. The analysis in Phase I might therefore underestimate the water needed for these uses, and overestimate the water available for future consumptive needs. It would be appropriate to acknowledge this in the Phase I Report, as well as provide some discussion of how this issue might be addressed in Phase II of the CRWAS.

2. **Hydrologic Effects of Forest Change.**

Given the ongoing interest in the hydrologic effects of forest change, we appreciate that this issue is specifically addressed in this report. We generally support your analysis and findings as summarized in the report and Technical Memo (Forest Change Literature Review and Suggested Methods - CRWAS Task 7.3/7.4). In particular we support your conclusion on page 2-44 that "... an analysis of deforestation is expected to have limited value for the CRWAS planning



horizons, the recommended approach is not to conduct a detailed hydrologic analysis and modeling associated with forest change as part of CRWAS.”

We strongly support the recommendation that future approaches to this issue be informed by current empirical studies of disturbed forests that are underway in Colorado. (Executive Summary Page III: “The U.S. Forest Service, in conjunction with the Colorado Water Conservation Board (CWCB) and the North Platte River Basin Roundtable, is completing a multi-year study to collect information regarding forest change processes that most influence the hydrology of disturbed forests within Colorado. Information from the study is expected to better describe corresponding hydrologic processes and to constrain assumptions to be used in future hydrological models. It is therefore appropriate to re-assess the potential for quantifying the impact of forest change on water availability when results of that ongoing work become available and the science of forest change assessment advances.”)

We note that you have included literature authored by agency researchers and interviews with Forest Service staff in the appendix to your CRWAS task 7.3/7.4 report. We hope that you will continue to rely on expertise in both the management and research branches of the agency as your work on this subject progresses. Please do not hesitate to contact Randy Karstaedt, Director of Physical Resources at 303-275-5374, if the agency can be of further assistance to this study.

Sincerely,

/s/ Antoine L. Dixon
ANTOINE L. DIXON
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Natural Resources