

South Platte Basin Round Table

Review Comments of Metro Basin Round Table Water Supply Paper June 5, 2013

The SPBRT has reviewed the Metro basin Roundtable water supply paper that outlines the vision for meeting the Gap for future water demands and supplies. The South Platte basin is integrally connected to almost all water supply planning for the Metro area. We commend Metro for their effort in developing alternatives that meet their future needs. We offer these comments as constructive critique expanded to consider a larger geographic region.

1. There is good discussion on the development of New Supply. However, the SPBRT feels strongly that the development of a New Supply **must** be a part of the portfolio. The default mechanism becomes the dry-up of irrigated agriculture and the majority of that will be in the South Platte Basin. This outcome is unacceptable as a default solution to meeting the gap. There is going to have to be a discussion and plan for developing a new west slope water supply. We believe that a project can be implemented that provides new water supplies for East and West slope interests. We think Metro should consider joining the SPBRT by taking a stronger position in stating in the affirmative that new west slope water supplies are needed for the future.
2. The SPBRT has looked at alternatives that involve agricultural dry-up and understand that some Ag dry-up is necessary for the entire state to meet the Gap. However, the amount of dry-up we envision for the South Platte is lower than what we perceive envisioned in the Metro plan. The SPBRT has a large geographic reach with many smaller communities. Our vision is not to turn any part of Eastern or Western Colorado into a sacrifice zone that eliminates water and economic opportunity outside of the Front Range. We believe the Metro paper should strongly recognize that value.
3. The impact of not developing a new west slope water supply will have serious implications to the non-consumptive needs of the South Platte basin. If a new west slope project is not undertaken immediately, the delay in implementation or do nothing approach will result in the dry-up of eastern plains agriculture to transfer water to the Front Range and in the loss of open space, wildlife habitat, and other non-consumptive benefits from irrigated agriculture . The unintended consequence of that could be placing additional species into the threatened or endangered categories, which could lead to severe ESA restrictions. It should be recognized that

non-consumptive needs in the South Platte Basin are extremely important and should be accounted for when looking at ways to meet the water supply shortages of this basin.

4. Stressing the development of new water supply beginning immediately is based on the fact that the process takes a very lengthy review process. Delaying the start of the process until the needs become more immediate makes agricultural dry-up inevitable and the biggest source of supply. We need to get past this paralysis by analysis mode that Colorado has been stuck in for the past 30 years or so. There is going to be risk in any decision we make to move forward. We can deal with it. Any New Supply project must have benefits for both sides of the Continental Divide. We need to move forward as a State to develop our compact entitlement, recognizing that any number we estimate for future supply will not be perfect, but move forward with the recognition that risk and mitigation measures need to be assessed and that inaction is not an option.
5. The discussion on reuse is very good. The Metro Denver area does have the highest reuse rate in the State, but that comes with the fact that Metro has the highest percentage of wholly consumable supplies. Other communities in the South Platte Basin are not matching these reuse percentages, not because of cost, but because they don't have the supplies to reuse.
6. The recognition given by the Metro Roundtable that conservation while important is not going to completely address the Gap is an important message and one that the South Platte Roundtable supports.
7. The Metro paper discusses where densities in future metropolitan development increase and drive down per capita water needs. This may be true for the Denver area, but again is not an applicable model for a large part of the South Platte basin roundtable. We think the paper should clarify that this future is only feasible in the Denver area and a few very select Front Range areas outside of Denver.
8. The South Platte Basin Roundtable believes that any good future for water supply for the State as a whole will require a coordinated effort of both the Front Range roundtables and the west slope roundtables. The Metro Supply paper can be used as a catalyst for a South Platte, Arkansas, Metro roundtable paper. That paper needs to forcefully describe a vision that includes development of west slope supplies that benefit both sides of the divide. This is a Statewide issue that is going to require cooperation of all the basin roundtables. Balkanization of parts of the state to resist other parts of the state is not what the roundtable process was intended for.