

# Comparing the 2013 *No and Low Regrets* Actions & 2024 DRAP Key Themes Executive Summary

## Background

At the February 2025 meeting of the Interbasin Compact Committee (IBCC), a subcommittee was created to focus on key topics discussed at the October 2024 C9 Summit in Crested Butte, particularly those related to the Drought Resilience Action Plan (DRAP). The subcommittee's mission was to crosswalk the DRAP topics with the Interbasin Compact Committee's (IBCC) *No and Low Regrets* (NLR) memorandum, dated September 13, 2013.

Subcommittee members included:

Joanne Fagan – Gunnison  
Kari VanValkenburg – North Platte  
Ken Brenner – Yampa-White-Green  
Ken Curtis – Southwest  
Lisa Darling – Metro  
Pat Wells – IBCC Governor Appointee  
Sean Cronin – South Platte

The group met on March 14, April 11, and April 28, and May 28 to complete their review, and to prepare an update for the IBCC membership on their progress in June. Members individually analyzed specific DRAP topics, then collectively identified key findings and outlined future recommendations for IBCC consideration.

## Crosswalk Exercise Recap

The subcommittee used the lists below to conduct the crosswalk exercise. This exercise consisted of each member of the subcommittee starting with a topic from the C9 DRAP exercise and reviewing the 2013 *No and Low Regrets* strategy (NLR) to find if and/or when the C9 topics are referenced in the NLR strategy or where there are conceptual linkages between the two documents.

The crosswalk exercise revealed that the **2013 *No and Low Regrets* memorandum** and the **2024 DRAP** share a strong philosophical foundation in meeting the goals of statewide water planning, and help set statewide priorities with Basin input. Both prioritize developing approaches to Colorado's water challenges that are innovative and applicable in all basins. However, DRAP demonstrates an evolution toward more comprehensive, far-reaching, and integrated resilience planning—reflecting new realities such as climate change, urbanization, and wildfire risks. Conversely, NLR includes substantive “actions” that could round out specific DRAP actions, or as a potential future “action plan” of the IBCC.

The IBCC’s original NLR vision was more focused on meeting the gaps in demands identified in the Statewide Water Supply Initiative (SWSI) through established strategies like conservation, alternative transfer methods, storage development, and beginning to incorporate nonconsumptive needs.

The evolution in thinking from 2013 to 2025 may reflect an expanding vision of the scope of statewide water supply planning, incorporating the most relevant scientific information, and a shift toward adaptation strategies that have multiple benefits across sectors. There are, however, specific “actions” within the NLR that have not yet been completed and could warrant a focus by the IBCC.

## Key Themes from the 2013 NLR and the C9 DRAP

### 2013 No & Low Regrets Actions

- Minimize Statewide Agricultural Acres Transferred (per Basin Goals) and Implement Agricultural Sharing Projects
- Plan and Preserve Options for Existing and New Supply
- Establish Low/Medium Conservation Strategies
- Implement Nonconsumptive Projects and Methods
- Have a High Success Rate for IPPs
- Implement and Assess Storage and Other Infrastructure

- Implement Reuse Strategies

### 2024 C9 DRAP Key Themes

- Nature-Based Solutions & Natural Infrastructure
- Water Efficiency & Storage
- Collaboration & Education
- Fire Management & Post Wildfire Recovery
- Climate Change Adaptation
- Protecting Colorado Agriculture
- Urban & Land Use Planning
- Cross-Sector Innovation

Summaries of the major findings from the Crosswalk Exercise are described starting on page 6. Each C9 Topic is compared with strategies described in the 2013 No & Low Regrets (NLR).

## Findings

The IBCC advanced statewide water discussions from its inception in 2005 through completion of Colorado’s first Water Plan in 2015 through work products such as the Conceptual Framework and the 2010 Letter to Governor Ritter and Governor-Elect Hickenlooper. Through these and other accomplishments, the IBCC and Basin Roundtables supported the CWCB’s statewide water planning efforts by establishing high level goals or “principles” that today are embedded in water-related policy goals and recommendations, including the the Colorado Water Plan and Basin Implementation Plans, and deeply integrated into the fabric of the Colorado water community.

Much of the IBCC’s work leading up to the 2013 No & Low Regrets Action Plan (2013 NLR Action Plan) was focused on developing strategies for how various water supply options (Ag Transfers, New Supply, Conservation, Reuse, and Storage) could work in concert to address the water supply “gap” and how Identified Projects and Processes could be properly identified, prioritized, and supported to meet the gap. During this same time, the IBCC identified the importance of supporting environmental and recreational attributes for the benefit of local

economies, quality of life, and Colorado's image and made recommendations for better supporting nonconsumptive water values.

## Next Steps

The NLR Subcommittee has concluded that updating the No & Low Regrets (NLR) Action Plan is a valuable and timely endeavor—one that would make strong use of the IBCC's time over the next 2–3 years. A revised NLR Action Plan can help set a broader vision for Colorado's water management over the next 10–15 years. Like the original plan, it can serve as a roadmap to begin advancing bold ideas, identifying critical gaps, and seizing key opportunities to build a more water-secure future for the state.

This is an important opportunity for IBCC to influence the long-term policy vision for Colorado's water future, and create a consensus-driven vision among the basin roundtables, the CWCB Board, and the IBCC. These ideas can then be integrated, where applicable, into the state's key water policy documents including the Analysis and Technical Update to the Water Plan, The Basin Implementation Plans, and the 2033 Colorado Water Plan.

### **Adopting the Plan to Complete NLR Action Plan Update**

The next step for the IBCC will be to decide whether to adopt the subcommittee's recommendation to begin developing a new NLR framework. While this does not require a formal vote of the IBCC, it should be advanced via polling the group to understand whether a consensus to advance this work has been established.

### **Work Plan & Process Proposal**

If adopted, the IBCC will need a workplan and process to guide this effort. CWCB staff have proposed a schedule that sequences IBCC conversations over the next 2-3 years in a way that the topics most integral to the next Analysis and Technical Update to the Colorado Water Plan can advance first, with other topics sequencing behind them. This schedule of key topics to address/discuss is flexible and can change with the IBCC's priorities.

The schedule is also intended to strengthen the process for engaging with basin roundtables and the CWCB Board. Developing a collaborative, iterative process will allow for the emergence of new ideas while also revisiting and refining previous concepts to ensure the final product reflects a strong, forward-looking vision for Colorado's water future. The below table is a proposed schedule for key topics for the IBCC to define the strategies/goals associated with each topic in upcoming meetings (1 or 2 topics per meeting). Prior to each IBCC meeting, members can work with their basin roundtables to gather basin specific priorities including opportunities and challenges for each topic that can help guide the discussion at the IBCC. CWCB Staff will review and share progress made on the 2013 NLR Strategies related to each topic being discussed at the IBCC meeting. This can be used in conjunction with information from the basin roundtables to update the No and Low Regrets for the next decade.

All of this work will take time and there will be many steps along the way. IBCC can use meeting time, subcommittees, and the C9 Summit to advance this work throughout the Water Plan update cycle.

## Possible IBCC Topic Prioritization Table in Order

C9 Topic	2013 NLR Task	Additional NLR Subtask	Proposed Discussion Date
<b>Storage &amp; Climate Scenarios</b>	<i>Plan and Preserve Options for Existing and New Supply</i>		October 2025
	<i>Implement and Assess Storage and Other Infrastructure</i>	Manage and Develop Strategic Storage and Infrastructure	
		Identify and Prioritize Multi-Purpose Storage and Infrastructure Opportunities	
		Analyze Infrastructure Needs for Storage and ATM Water	
<b>Protecting Colorado Agriculture</b>	<i>Minimize Statewide Agricultural Acres Transferred (per Basin Goals) and Implement Agricultural Sharing Projects</i>	Develop an Incentives Program for ATM	February 2026
		Establish ATM Demonstration Projects	
		Establish Basin Goals and Ongoing Progress	
		Implement ATM Program	
		Analyze Infrastructure Needs for Storage and ATM Water	
<b>Water Conservation &amp; Efficiency</b> <b>Urban &amp; Land Use Planning</b>	<i>Establish Low/Medium Conservation Strategies</i>	Improve Tracking and Quantification of Conservation	June 2026
		Establish a Statewide Conservation Goal With Intermittent Benchmarks	
		Continue to Support Local Implementation of Best Practices	
		Promote Enabling Conditions for Use of Conserved Water	
		Develop New Incentives for Conservation	

		Explore Legislative Concepts and Develop Support	
		Implement Education and Outreach Efforts	
	<i>Implement Reuse Strategies</i>	Improve Tracking, Quantification, and Planning	
		Establish a Statewide Reuse Goal with Intermittent Benchmarks	
		Develop New Incentives for Reuse	
		Implement Education and Outreach Efforts	
<b>Fire Management &amp; Post Wildfire Recovery</b>	<i>Implement Nonconsumptive Projects and Methods</i>	Develop Statewide Goals and Measurable Outcomes to be Considered for Incorporation Into BIPs	October 2026
		Pursue Projects and Methods to Meet Nonconsumptive Needs as Part of the Basin Implementation Plans	
		Track Nonconsumptive Projects and Methods	
		Develop Incentives, Including Funding for Projects and Methods in the Nonconsumptive Focus Areas	
<b>Nature-Based Solutions &amp; Natural Infrastructure</b>	<i>Implement Nonconsumptive Projects and Methods</i>	Develop Statewide Goals and Measurable Outcomes to be Considered for Incorporation Into BIPs	February 2027
		Pursue Projects and Methods to Meet Nonconsumptive Needs as Part of the Basin Implementation Plans	
		Track Nonconsumptive Projects and Methods	
		Develop Incentives, Including Funding for Projects and Methods in the Nonconsumptive Focus Areas	
<b>Climate Change Adaptation &amp;</b>			June 2027

<b>Cross-Sector Innovation</b>			
<b>Collaboration &amp; Education</b>			October 2027

# Cross Walk Exercise Findings

## Nature-Based Solutions & Natural Infrastructure

C9 DRAP focuses on using trees, beaver projects, soil health, snowpack restoration, etc., while in the 2013 NLR memo, nature-based solutions were not a common term. Actions like these were encouraged but there is not much of a specific linkage. Conceptually there is some alignment, but the Memo lacks the modern terminology used in the DRAP details.

*DRAP Focus:* Utilizes natural systems such as forests, wetlands, beaver projects, and soil health initiatives to enhance resilience and water supply.

*2013 NLR Alignment:* Nature-based solutions were not explicitly referenced in the 2013 memorandum. However, several recommended actions indirectly supported ecosystem health through agricultural water transfers, nonconsumptive surveys and analyses, and conservation initiatives.

*Conclusion:* There is conceptual alignment, though the terminology and direct emphasis on nature-based strategies have evolved significantly.

## Water Efficiency & Storage

The C9 DRAP Actions for Water Efficiency and Storage are directly linked to the Establishing Low/Medium Conservation Strategies and Implementing and Assess Storage and Other Infrastructure actions in the 2013 NLR Action Plan. The C9 DRAP details can also be mapped to several subgoals in the 2013 Plan which include identifying and prioritizing multi-purpose projects, improving tracking and quantification of progress on water supply strategies (e.g., Conservation, ATMs, reuse, etc.), and supporting a high success rate for IPPs. Water efficiency and storage were also incorporated into the following goals and measurable objectives of the 2015 Water Plan:

- Achieving 400,000 AF of M&I water conservation by 2050;
- Attaining 400,000 AF of water storage in order to manage and share conserved water and the yield of IPPs by 2050;
- Reducing the projected 2050 M&I gap from as much as 560,000 AF to zero AF by 2050
- Establishing a goal that 75 percent of Coloradans will live in communities that have incorporated water-saving actions into land-use planning.

Today, statewide water discussions have evolved to include a greater focus on multi-purpose project benefits, exploring ways to optimize water system operations and provide multi-purpose project benefits, and considering water use efficiency across all water use sectors (not just for M&I use), as is reflected in the C9 DRAP details relating to water efficiency and storage.

*DRAP Focus:* Promotes integrated strategies for municipal, industrial, and agricultural efficiency; emphasizes the expansion of storage to manage conserved supplies.

*2013 NLR Alignment:* Closely aligned. The NLR outlined similar conservation goals, including 400,000 AF of water conservation and 400,000 AF of new storage by 2050, echoing today's targets.

*Conclusion:* There is strong continuity between the two documents, with DRAP building on and expanding previous efficiency and storage goals.

## Collaboration & Education

The C9 topic of Collaboration and Education has numerous references in the NLR 2013 document. In summary, while we've made progress there still seems to be much work to do.

The greatest success is in the category of "Build collaborative relationships through trust and engagement in basin round tables and public programs". We are getting better at "Encourage informal and formal collaboration across sectors and communities" but there are opportunities arising regularly.

The greatest opportunity for progress would be with both, "Support education for new water leaders, elected officials, and the public" as well as "Mentorship for the next generation, creating internship and capacity building opportunities".

*DRAP Focus:* Prioritizes trust-building, stakeholder engagement, and cross-sector education initiatives.

*2013 NLR Alignment:* Collaboration was a key tenet of the NLR's "no/low regrets" approach, particularly to foster broad stakeholder support for adaptive management.

*Conclusion:* Highly aligned, with collaboration recognized as essential in both efforts.

## Climate Change Adaptation

C9 DRAP focuses on addressing climate change impacts through mitigation and reducing carbon footprints. The 2013 NLR Memo did not include direct references or actions related to climate change, but focused on policies and project development that could provide resiliency to address climate change impacts. Both talk about changing water use practices, but the Memo leans more on policy and financial tools, while DRAP focuses on broader and more specifically climate-related adaptation measures.

*DRAP Focus:* Directly addresses climate change impacts, including both temperature increase (warmer) and reduced snowpack impacts (less snow). Calls out adaptation strategies to mitigate flooding, wildfire, while calling for mitigation via promoting drought-resistant crops, sustainable urban landscapes, and eco-friendly building practices. The DRAP also calls to reduce the carbon footprint in water projects and integrate renewable energy sources for water management.

*2013 NLR Alignment:* While not framed explicitly as "climate adaptation," NLR actions—such as water conservation, storage, water reuse and diversifying water sources could support climate resilience mitigating some impacts.



*Conclusion:* The DRAP adopts a more explicit and proactive approach to climate risks compared to the 2013 plan.

### Protecting Colorado Agriculture

C9 DRAP included a broad goal of sustaining Colorado agriculture. However, the 2013 NLR included specifics on promoting sustainable practices, researching alternative crops, and protecting agricultural lands.

*DRAP Focus:* Emphasizes sustaining agricultural economies, water rights, and practices in the face of growing municipal demand and climate pressures.

*2013 NLR Alignment:* Focused heavily on minimizing "buy-and-dry" practices and developing agricultural sharing strategies.

*Conclusion:* Shared goals are evident, though DRAP reflects broader concerns about agricultural resilience beyond water transfers alone.

### Urban & Land Use Planning

The primary focus of planning around land use (and growth) in the 2013 No and Low Regrets Strategy centered on conservation practices in primarily urban landscapes; CWCB has advanced urban landscape concepts in significant ways since that time. One example was the formation of Urban Landscape Conservation Task Force in 2023, which resulted in 10 recommendations for advancement of transformational landscape change, including "Advance Water and Land Use Integration" in water supply planning, demand analysis, supporting climate appropriate landscapes.

The underlying understanding, though, was that as Colorado grows, land-use planning and water planning become more closely connected; and the way Colorado develops into the future will have a strong influence on Colorado's future water supply gap. CWCB has partnered with their sister agency DOLA to facilitate the use of local land-use tools to reduce water demands for municipalities and avoid urbanization of agricultural lands. CWCB encourages the incorporation of land-use practices into water conservation plans. The definition of "Vibrant Communities" in the 2023 Colorado Water Plan includes this descriptor: Holistic water management is essential for creating vibrant Communities that balance water supply and demand need to create a sustainable urban landscape. Colorado communities need resilient water supplies, water-conscious and attractive urban landscapes, planning that integrates land use and water solutions, and communities who understand the importance of water to their lives and economy.

*DRAP Focus:* Calls for integrating water supply considerations into land use planning to promote sustainable growth.

*2013 NLR Alignment:* The 2013 memorandum touched on conservation but did not deeply address land use. Since then, initiatives like the 2023 Urban Landscape Conservation Task Force have significantly expanded this focus.

*Conclusion:* The DRAP advances an area that was still emerging in 2013, now seen as vital for resilient water management.

## Cross-Sector Innovation

Under “Cross Sector Innovation” in the DRAP, one goal is encouraging cross-sector solutions, partnerships, and strategic planning to address water, agricultural, and wildfire challenges. The No and Low Regrets (NLR) document doesn’t really address projects such as wildfire prevention and forest management, that affect water, but don’t involve direct management of water. The NLR document emphasizes the significance of collaboration across sectors to effectively advance multi-benefit projects. It outlines existing partnerships across the state and includes a subheading in each section titled “Partners.” Additionally, it encourages Basin Implementation Plans (BIPs) to promote multi-purpose cooperative projects. Another goal of “Cross Sector Innovation” is to include stakeholders from diverse sectors (e.g., agriculture, water, tourism, energy) to ensure holistic and adaptive strategies. This objective is also found woven through the entirety of the NLR plan. Both the DRAP and the NLR point to the importance of involving all the relevant stakeholders and collaborating with partners, and the NLR document does a good job of laying out who those stakeholders and partners have been in the past and may be in the future.

*DRAP Focus:* Encourages innovative partnerships across water, agriculture, wildfire recovery, and land management sectors.

*2013 NLR Alignment:* Highlighted partnerships primarily among traditional water sectors (e.g., municipal, agricultural). Broader cross-sector innovation was less developed.

*Conclusion:* DRAP reflects a maturation of cross-sector collaboration concepts initiated in earlier IBCC work.

## Fire Management & Post Wildfire Recovery

There does not appear to be any real cross linkage between Fire management from the C9 summit DRAP concepts and the No and Low regrets document. The only potential linkage is a couple of references in the latter to watershed protection and watershed health that would be helpful for fire management. We believe the lack of linkage is due to the No and Low regrets document being focused on things that were easier to accomplish, not very controversial, and had the potential for more impact saving water, whereas the C9 topics were a broader look and did not have those limitations.

*DRAP Focus:* Addresses wildfire mitigation, recovery strategies, and the intersection with watershed health.

*2013 NLR Alignment:* Wildfire was not a primary focus of the 2013 memorandum, though some actions indirectly supported watershed health post-disturbance.

*Conclusion:* This is a new emphasis in DRAP, representing an important expansion of resilience planning.

## ADDENDUM: Progress Summary on 2013 *No and Low Regrets* Strategies

Colorado has made substantial strides through most 2013 *No and Low Regrets* strategies. Conservation, watershed health, integrated planning, and public education have advanced notably. While progress in areas like reuse and ATMs continues to evolve, the groundwork laid over the past decade positions the state well to implement even more adaptive and resilient water management solutions going forward. The target for completing these actions was over 10-15 years, meaning that as of 2025, Colorado has had 12 years to advance these strategies.

2013 Low & No Regrets Strategies	Additional Details for each Strategy	CWCB Work or Projects	2023 Water Plan Agency Actions
<b>Minimize Statewide Agricultural Acres Transferred (per Basin Goals) and Implement Agricultural Sharing Projects</b>	Develop an Incentives Program		
	Establish ATM Demonstration Projects	The ATM status update 2020, the CWSA Update 2025	2.3, 2.4, 2.5, 2.6
	Establish Basin Goals and Ongoing Progress	BIP Update, Water Plan Chapter 4	5.2
	Implement ATM Program	CWSA category in water plan grant program, created tools and resources for CWSAs, Continue to express support for CWSAs in Water Plan	2.3, 2.4, 2.5, 2.6, 2.1
<b>Establish Low/Medium Conservation Strategies</b>	Improve Tracking and Quantification of Conservation	1051 Reporting / Annual Water Loss Audits	
	Establish a Statewide Conservation Goal With Intermittent Benchmarks	Levels Analysis SWSI / Tech Update Water Plan Action 1.1	1.1
	Continue to Support Local Implementation of Best Practices	Continued support of WSRF program (2006 - current) Establishment of WPG Program (2017) Turf Replacement Program (2023) Colorado Waterwise Best Practices Guidebook for Municipal Water Conservation	
	Promote Enabling Conditions for Use of Conserved Water	System Conservation Pilot Program	
	Develop New Incentives for Conservation	C.R.S § 37-60-126 - Since 2006, Colorado has required a state approved water efficiency plan in order to receive CWCB grant funding.	
	Explore Legislative Concepts and Develop Support	SB07-008   Expansion of the Water Efficiency Grant Program HB04-1365   The Water Conservation Act of 2004 HB10-1051   Concerning Additional Information Regarding Covered Entities' Water Efficiency Plans HB 16-1005   (Residential Precipitation Collection) Concerning the use of rain barrels to collect precipitation from a residential rooftop for nonpotable outdoor use SB15-008   Concerning the Promotion of Water Conservation in the Land Use Planning Process	

		<p>SB14-103   Concerning the phase-out of the sale of certain low-efficiency plumbing fixtures</p> <p>HB 19 -1231 - Water Efficient Fixtures (WaterSense) Requirements</p> <p>HB 22-1151 Turf Replacement Program Bill</p> <p>SB 24-174 Land Use and Housing Legislation - Requires certain jurisdictions to complete local housing needs assessments, housing action plans that include affordability and displacement mitigation strategies, and new elements of comprehensive plans that incorporate water supply and strategic growth elements</p>	
	Implement Education and Outreach Efforts		
<b>Implement Nonconsumptive Projects and Methods</b>	Develop Statewide Goals and Measurable Outcomes to be Considered for Incorporation Into BIPs	1st BIP created non-consumptive needs assessment, has become integrated into the planning and project processes. Second round of BIPs included updated focus area maps: <a href="https://cwcb.maps.arcgis.com/apps/MapSeries/index.html?appid=880753ceb13d43e3bc89e2259247aafa">https://cwcb.maps.arcgis.com/apps/MapSeries/index.html?appid=880753ceb13d43e3bc89e2259247aafa</a>	
	Pursue Projects and Methods to Meet Nonconsumptive Needs as Part of the Basin Implementation Plans	1st BIP created non-consumptive needs assessment, has become integrated into the planning and project processes	
	Track Nonconsumptive Projects and Methods	Project Database	
	Develop Incentives, Including Funding for Projects and Methods in the Nonconsumptive Focus Areas	CWCB Grant programs support non-consumptive projects and prioritize multi-benefit projects, The Focus Area maps incorporated into the 1st BIPs. An update of the focus area maps and the Environmental flow tool	
<b>Have a High Success Rate for IPPs</b>	Support Local Implementation of IPPs	Ongoing support through funding in the WPG, WSRF, Loans, and other CWCB programs	5.7, 5.6, 4.2
	Update Tracking and Data Collection via the Basin Needs Decision Support System (BNDSS)	Created Project Database, funded an update of the IPP list during the BIP update, Ongoing support and maintenance of the project database	5.7, 5.6, 4.2
	Optimize Funding Sources for IPPs	Establish WPG Program 2017 Prop DD /Prop JJ Funding Initiatives	5.7, 5.6, 4.2

		Stabilize WSRF by changing the funding structure, Stimulus into WSRF (HB 21-1260), Special \$17M infusion into WSRF	
	Generate Political Support for IPPs	The establishment of the Water Plan Grant program and funding through voter initiatives demonstrate state level support for developing water projects.	
<b>Implement and Assess Storage and Other Infrastructure</b>	Manage and Develop Strategic Storage and Infrastructure		
	Identify and Prioritize Multi-Purpose Storage and Infrastructure Opportunities	Storage Study in Tech update 2019, Storage Study in next Tech update, Narrative in the CWP about opportunities	1.9
	Analyze Infrastructure Needs for Storage and ATM Water	Included in Water Plan as a need & strategy for Colorado and the CWCB	1.9, 2.3, 1.4, 2.4
<b>Implement Reuse Strategies</b>	Improve Tracking, Quantification, and Planning	CWCB has invested approximately \$2 million in research, projects, and rulemaking in order to increase the adoption of water reuse in Colorado.	
	Establish a Statewide Reuse Goal with Intermittent Benchmarks		
	Develop New Incentives for Reuse	The Water Plan Grant program offers funding for reuse projects.	1.5
	Implement Education and Outreach Efforts	CWCB has spent the last several years working with the Colorado Department of Health and Environment and a multitude of stakeholders to develop the nation's first statewide Direct Potable Reuse regulations.	