



“Voice of the Western Slope since 1953”
A coalition of counties, communities, businesses & individuals

(970) 242-3264 ★ FAX (970) 245-8300
P.O. Box 550 ★ Grand Junction, CO 81502-0550
www.club20.org

Dear Colorado River Drought Mitigation Task Force:

Club 20 appreciates the challenging work being taken on by the members of the Drought Task Force (DTF). Our organization has a 70-year history of learning about and developing positions on strategies, regulations, and funding for agriculture, water, and public lands in Western Colorado. The Western Slope is 68% forested and encompasses much of the Colorado River watershed that is the source of over 70% of the water in the Colorado River. Major tributaries such as the Gunnison, Yampa White, also flow through our western counties. The Aspinall Unit – Blue Mesa reservoir- and other reservoirs and diversion systems are physically on the western slope, and understandably water policy is a top issue for Club 20.

Club 20 policy committees have spent the last two decades delving into the changing hydrology of our landscapes and the repercussions for our communities, forests, and watersheds. We have hosted subject area experts to keep our membership apprised of the crisis on the river. Our meetings include the attendance and interaction with local experts on the ground and those closely affected by the future policies and operating guidelines which will guide future management of the Colorado River and our Western slope landscapes.

Club 20 has a unique commitment to fully understand the value, the risks, and the adaptation necessary to be good stewards while living with the land. Our members are deeply committed to knowing about and caring for our rivers and forests. The work that the DTF is doing will affect both our recreation and agriculture industries. Agriculture, and agriculture water, support tens of thousands of farms and ranches throughout the state. Every Club 20 county depends on hunting, fishing, rafting, camping, managing wildlife, ranching, and farming and all the supporting businesses that are important to living and working on these precious landscapes.

In this spirit, we'd share the following comments.

- 1) The lower basin states must address their overuse and depletion, to include evaporation and transit losses.
 - a. This has been the consistent message to us from Colorado River District, Southwest River District, Commissioner Mitchell, and Colorado Water Conservation Board members.
- 2) Operations must respond to real hydrology.
 - a. Our counties are dependent on variable hydrology as few other states are. We cannot draw down more water from the country's largest reservoirs. Our hydrology depends on snowpack and rainfall, which varies annually. We are committed to sustainable solutions that protect ALL businesses and jobs that make Colorado a vibrant and beautiful place to live.
- 3) Maintain respect for prior appropriation.
 - a. Colorado has a solid history of managing and measuring water use which is a stronger foundation than most Colorado River states. Measurement is key and improvements in measuring water and snowpack and new telemetry and could assist in future adaptation.
- 4) Urge all water users, ditch companies and utilities to develop their system-specific 'demand management' protocols.
 - a. One size fits all solutions have rarely made economic or practical sense in the diverse water delivery systems on the West Slope. Voluntary plans are preferred.
 - b. This effort could mimic the legislated standards for Community Wildfire Protection Plans (CWPP) for forested counties.
- 5) We support the DTF emphasis on aging infrastructure.
 - a. We are home to some of the first Bureau of Reclamation (BOR) projects in the US, including the Uncompahgre Valley Water Users (1902) and the Grand Valley Water Users (1906).

- b. Aging agriculture infrastructure has few funding sources yet is one of the largest water savers we can reach by maintaining and improving our existing water infrastructure and avoiding losses in that capacity.
- 6) We support adding storage, of any size, to add water in wet years, in order to support stream health, recreation, agriculture and municipal uses in dry years.
 - a. Note the high importance of storage in our newest update to Colorado's Water Plan.
 - b. Stress the importance of fully funding Water Supply Reserve Funds.
- 7) We support acknowledging the forest and water interconnection and the risk that wildfire has to water supplies that may need added tools to meet the higher risks during decades of drought.
 - a. Stronger implementation of CWPPs, CWP², and Wildfire Ready Watershed efforts.
- 8) We are always concerned about 'buy and dry' and speculation that could upend years of solid water management in all of Colorado.
- 9) We appreciate the inclusion of the Colorado tribes as we address all water supply issues.

At this time, demand management protocols and intrastate tools should focus on enhancing the best possible strategies for water management **within** the state of Colorado rather than sending more streamflow to the Lower Basin, which has a historic problem of overuse of compact water. As the DTF proceeds, we suggest that the Colorado compact compliance strategy includes a 'trigger' that would initiate maximum water conservation by all regions, from all rivers, equitably across Colorado.

Local and regional oversight is much more accurate than decisions from the federal or state levels, which are often influenced by political pressure. Every effort must be made to ensure that water sharing, and innovative new programs do not cause injury to other water rights. Local knowledge and the state engineer have a role too in avoiding unintended consequences.

As the task force continues, we will monitor and support your efforts and may send in further comments as the report is completed. Many complex subjects may take longer to study than the remaining two months, and it may prove to be important to extend this diverse task force to find further possible solutions. Choosing the wrong tools too soon could be more detrimental than taking a breath while all the information and unintended consequences is considered.

Thank you for considering our perspective and to all the entities that made this important effort possible! We have great faith in our western slope communities and institutions that we can make smart decisions and careful adaptations to meet the crisis of the river.

Best Regards,



Brittany Dixon
Executive Director
Club 20

Marti Whitmore, Water Committee Co-Chair
Chris Treese, Water Committee Co-Chair