

DATE: December 5, 2023

TO: Chair Kathy Chandler-Henry
Colorado River Drought Task Force
Via email: kathy.chandlerhenry@eaglecounty.us

FROM: Claire Carroll, QQ Director
Northwest Colorado Council of Governments (NWCCOG)
Water Quality/Quantity Committee (QQ)



P.O. Box 2308
Silverthorne, CO 80498

RE: QQ Comments on the Colorado River Drought Task Force’s Proposed Recommendations and Narratives to the Legislature

Dear Chair Chandler-Henry,

Please accept these comments regarding the Proposed Recommendations and Narratives to the Legislature by the Colorado River Drought Task (“Recommendations”) on behalf of the Northwest Colorado Council of Governments (NWCCOG) Water Quality/Quantity Committee (QQ).

QQ comprises 47 local governments in the headwaters of the Gunnison, Colorado, and Yampa River Basins in Colorado, referred to as the “headwaters region,” whose purpose is to protect and enhance the region’s water resources while encouraging its responsible use for the good of Colorado citizens and the environment.

QQ supported SB23-295, Colorado River Drought Task Force, because drought and climate change impact water quality and quantity in the headwaters region more acutely every year. Strategies that will keep Colorado nimble in protecting water resources are much needed. We want to commend the Task Force’s hard work and collaboration in identifying such solutions.

I. Drought Impacts in the QQ Region

For many decades, the headwaters region has experienced reduced stream flows and degraded water quality from the 16 transmountain diversions (TMDs) in the region that collectively divert an average of 511,700 acre-feet of water to the East Slope (with thousands more acre-feet to be diverted through already-planned projects). Impacts from TMDs have in many ways mimicked drought conditions in the headwaters region for decades. Many existing TMDs were developed without appropriate mitigation, and the environmental damage is still being addressed today. Climate change is predicted to worsen these conditions and is projected to lead to major increases in wildfires.¹ This will in turn increase flooding and sedimentation from burned areas and negatively impact water quality.

The economy in the QQ region is inextricably linked to water quality and watershed health. Recreation tourism is the cornerstone of the QQ region’s economy and a dominant element of the economy of the

¹ Saunders/Easley. Climate Change in the Headwaters Water and Snow Impacts, NWCCOG, 2018, <https://www.dropbox.com/s/icwl444ikzygd62/ClimateChangeInHeadwaters%202018.pdf?dl=0>

entire state.² Reduced streamflows and degraded water quality impact the region's environment and economy. QQ supports efforts to develop and improve existing tools to address these compounding issues that are predicted to worsen in the future.

II. Important Issues in the Drought Task Force Recommendations

The following Drought Task Force Recommendations are worthy of inclusion in the final report as important strategies to protect the QQ environment and economy in light of increasing high temperatures and drought conditions:

1. Recommendations to Protect and Enhance Stream Flows:

- J. Drought Legislation Supporting Water Use Transition to Reduce Carbon Dioxide Emissions and Develop Clean Energy Resources by 2050 (pg 15).
- K. Stream & Riparian Area Management: Temporary Loan Program (pg 19).
- M. Expansion of Agricultural Water Protection Water Rights Beyond Divisions 1 & 2 (pg 21).
- P. Shepherding with Environmental Co-Benefits (pg 23).

2. Recommendations to Promote Forest Health:

- G. Natural Process Protection to Promote Drought and Wildfire Resiliency (pg 12).
- H. Prioritize Forest Health and Wildfire Ready Watersheds (pg 13).

3. Recommendations to Promote Municipal Water Conservation:

- W. Municipal: Turf Removal Program (pg 35).
- X. Municipal: Advanced Metering Infrastructure (AMI) (pg 36).
- Y. Municipal: Direct Potable Reuse – Facilitate, Fund and Support (pg 37).


4. Additional Recommendation to Promote Municipal Water Conservation:

- Municipal water conservation is an essential component in addressing future drought as the Colorado River Basin continues to grow. The Drought Task Force should reference the value of ongoing participation and state support for the Sonoran Institute's [Growing Water Smart training program](#) for local governments. The Task Force should consider the importance of the whole of the Colorado River Basin participating in Growing Water Smart trainings, not just Colorado. The Sonoran Institute currently has programs in Arizona, California, and Utah.

III. State Role in Identifying Storage

Recommendation F. Statewide Planning and Funding for Storage Reservoirs (pg 10) in part proposes a state study of new storage potential on the West Slope. QQ questions the role of the state in determining future storage placement and strategy as put forth in these concepts, especially when evaluating the local and regional impacts of a project. The identification of future storage projects is best when the impacts of the impacted counties, conservancy districts, and conservation districts are considered from the start. Moreover, consistent with the Colorado Water Plan, storage projects should identify multiple benefits above and beyond the narrow purposes for which the project is built (even if they are “multi-purpose”)—making streams and rivers healthier to the maximum extent possible. This is best done at the local level

² Coley/Forrest, Inc., Water and Its Relationship to the Economies of the Headwaters Counties, NWCCOG, 2011, http://nwccog.org/wp-content/uploads/2015/03/QQStudy_Report_Jan-2012.pdf



through current processes, including state grantmaking to assist local entities in developing storage projects.³

IV. Conclusion

QQ appreciates the Task Force's thoughtful and collaborative approach in putting forth Recommendations that will address drought and climate change in the Colorado River Basin. Please contact Claire Carroll with any questions regarding QQ's comments. Thank you for your hard work on this critical issue.

Sincerely,



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CC:

Speaker Julie McCluskie, Colorado House of Representatives
Representative Marc Catlin, Colorado House of Representatives
Senator Dylan Roberts, Colorado Senate
Senator Perry Will, Colorado Senate
Becky Mitchell, Commissioner, Upper Colorado River Commission
Lauren Ris, Director, Colorado Water Conservation Board

³ This concern is based on successfully negotiated agreements with QQ members and Front Range water providers that protect and benefit West Slope water resources while honoring the needs of the water supplier—including Eagle River MOU, the negotiated agreement and 1041 permit for Windy Gap Firming Project, the Colorado River Cooperative Agreement (CRCA), and Wolford Reservoir joint operations.