

December 17, 2010

To: Governor Ritter and Governor-elect Hickenlooper

From: Save the Poudre: Poudre Waterkeeper

Re: Comment on the IBCC's letter to you

Dear Governor Ritter and Governor-elect Hickenlooper,

Recently, you received a letter and draft report from the State of Colorado Interbasin Compact Committee (IBCC) regarding its activities and proposals for future water supply in Colorado. The IBCC report is posted here: http://poudreriver.home.comcast.net/~poudreriver/IBCC_Report_12_15_10.pdf. We appreciate the work of the IBCC. We believe the IBCC has made progress on this very complicated and political issue. Save the Poudre: Poudre Waterkeeper has reviewed the letter and draft report and would like to offer you additional insight about how any future work of the IBCC and South Platte Roundtable could be improved.

Please be aware that the IBCC's and the South Platte Basin Roundtable's activities may have more of an impact on the Poudre River than on any river in the state of Colorado. The Poudre is already severely depleted, and due to several proposed dam and reservoir projects is one of the most endangered rivers in America. As it runs through Fort Collins, the Poudre River is sometimes drained completely dry (see <http://savethepoudre.org/photo-gallery-2010-07-19b.html>). By the time the river reaches downtown Fort Collins, 60% of its water has been drained out in an average year. Multiple proposed new dam, reservoir, and pipeline projects threaten the river making it ground zero for river destruction in Colorado and in the Southwest U.S. The battle to save the Poudre is likewise one of the biggest river conflicts in the Southwest – at present, 19 environmental groups have partnered in the “Save the Poudre Coalition” in a fight to keep the river alive.

The IBCC and South Platte Roundtable's efforts could be improved by:

1. Including a true diversity of stakeholders at the table. Of the 27 appointed participants on the IBCC, only 2 represent environmental stakeholders – that's 7.4%. Additionally, of the 51 appointed participants on the South Platte basin roundtable (our basin), only 2 represent environmental

stakeholders – that's 4%. Of the 19 organizations partnering in the Save the Poudre Coalition, none have a voice on the South Platte Roundtable or the IBCC. Stated differently, the biggest conflict in the South Platte basin and one of the biggest conflicts in Colorado and the Southwest U.S. – the battle to save the Poudre River – is nearly voiceless in the supposedly public and state-funded IBCC/South Platte Roundtable process. The partner groups in the Save the Poudre Coalition represent over 3 million American citizens, including hundreds-of-thousands in Colorado and tens-of-thousands in northern Colorado. The IBCC report says it has "...all the diverse interests at the table..."(page 1) – this statement is absolutely not true. The lack of environmental representation on these committees could be a fatal flaw in the current, and any future, effort to avoid conflict over future water supply and river protection policies and decisions. Future IBCC and basin roundtable efforts must to include more environmental stakeholders. We recommend a minimum of 25% of participants represent environmental stakeholders.

2. Adopting high water conservation goals. The report avoids putting hard numbers on the role of active water conservation to meet the "gap." We believe that conservation can and should play a dramatically larger role than anticipated by the IBCC report. We believe the ongoing CWCB planning efforts to identify a "high potential water conservation scenario" should be adopted statewide and by local and regional water providers, and be implemented before any new dam and reservoir proposals are considered in Colorado. The current CWCB "Water Conservation Strategies" draft report posted here: <http://cwcb.state.co.us/Documents/ShortTermHomePage/SWSI2010ConservationStrategies.pdf> suggests that 615,300 acre feet of water can be conserved. As compared to new dams and reservoirs, conservation is fast, cheap, reliable, implementable, and offers a 'no regrets' strategy to meet future water supply. Additionally, we disagree with many of the assertions in the letter and report that repeatedly state that water conservation can't fill the gap, – we believe conservation can meet much, and perhaps all, of the gap and should be aggressively implemented first.

3. Addressing the challenge of managing population growth. The "enormous challenge" (page 1) caused by future population growth in Colorado is taken as a de facto reality in the letter and report ("Colorado's population, projected to nearly double by 2050..." – page 2). The letter and report is very clear about the negative impacts of unbridled population growth – the destruction of farmland and its economy, the destruction of rivers, and the draining of local and state government financial resources – so why doesn't the report more directly address the challenge of managing population growth? In several places in the letter and report, the IBCC mentions the need for smarter land-use planning that will help mitigate the impacts of population growth on our water resources, but specifics ideas and methods are lacking. In our opinion, addressing the challenge of managing population growth is fiscally, economically, environmentally, and agriculturally responsible. A good primer on smarter growth planning is available from Western Resource Advocates, titled "New House New Paradigm: A Model for How to Plan, Build, and Live Water-smart," and is available to the public here: <http://www.westernresourceadvocates.org/water/newparadigm/report.php> Any future efforts by the IBCC should better explore, and offer tangible proposals, to implement state and local land-use planning goals and other smart population-growth policies that conserve water, protect farms, and protect rivers.

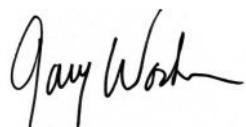
4. Making population growth pay its own costs. The letter and report suggest that the predicted cost of new water supply projects to fill the gap is between \$16 billion and \$18 billion, and also says, "State funding will be required at increased levels in order for Colorado to meet its water supply needs." (page 10) In our opinion, good public policy requires that costs should be "allocated to all beneficiaries fairly"

(page 13), and thus new water supply that will solely benefit future population growth should be paid for by future population growth, not by current Colorado residents. Many cities in Colorado have policies that require developers to turn over water or “cash-in-lieu-of-water” when new development occurs – these policies should be supported and enhanced, not undermined by having state taxpayers backfill and bail out poor planning at the local level. Any future work of the IBCC should carefully reconsider the role of using state taxes and revenues to subsidize new water projects for future population growth.

Thank you for the opportunity to comment on the IBCC letter and draft report. Please be aware that we also sent a letter to the IBCC about the “IPP” (Identified Projects and Processes) sub-document in this report. That letter contains significantly more concerns and recommendations about the State’s role in supporting IPPs and is posted here: <http://savethepoudre.org/stp-correspondence/2010-11-29-stp-letter-to-interbasin-compact-commission.pdf>.

Please feel free to contact us with any questions or concerns.

Respectfully,



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Save The Poudre: Poudre Waterkeeper is a coalition of 19 national, state, and regional groups including: Waterkeeper Alliance, National Wildlife Federation, Clean Water Action, Wild Earth Guardians, the Xerces Society, Defenders of Wildlife, American Rivers, American Whitewater Association, Western Resource Advocates, Colorado Environmental Coalition, Lighthawk, Environment Colorado, Sierra Club – Rocky Mountain Chapter, Fort Collins Audubon Society, Citizen Planners, Wolverine Farm Publishing, Poudre Paddlers, Friends of the Poudre, and the Cache la Poudre River Foundation. Membership in these groups totals over 3 million American citizens.