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**Comments by Stephen Saunders, President
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On July 2015 Draft of Colorado's Water Plan**

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Thank you for the opportunity for the Rocky Mountain Climate Organization (RMCO) to provide these further comments on the current draft, dated July 2, 2015, of Colorado's Water Plan. RMCO previously submitted two comprehensive sets of comments on earlier drafts of the state water plan—in October 2014, on the early working drafts of the plan, and again in May 2015, on the first official draft, dated December 2014. In both sets of comments, we focused primarily on the consideration of climate change and its potential impacts on Colorado's water supplies and water quality. We applaud the continued improvements that each version of the draft report has made on this topic. In the latest draft, for example, somewhat more detail has been added to the explanations of climate change impacts on both water supplies and demands for water.

However, many of RMCO's previous comments continue to apply to the current draft. While we do not repeat them all here, we still believe it important that the plan be further revised to bring into sharper focus what the state government, water suppliers and users, and the general public should understand and can do to fully address the substantial risks that climate change poses to water supplies and water quality. This continuing concern is consistent with other comments received on the draft plan. Last October, Denver Water commented, "the climate change portion falls short. . . . While some general information is provided in the Plan, the full breadth of the potential impacts of climate change needs to be explicitly included and explained." In April, the Front Range Water Council commented, "Climate change is potentially an equal or greater contributor than population growth to the state's looming future water gap," and identified five new recommended actions to be included in the plan to address climate change, including, "The state needs to identify potential impacts from climate change in the municipal and agricultural supply and demand projections in the state water plan under reasonable future climate scenarios." Despite the addition of somewhat more discussion of climate change in the July draft, these comments, as well as RMCO's similar earlier comments, still apply to the that draft of the plan. In a view we know to be shared by others, we urge the CWCB to continue making improvements in the plan's explanation of how climate change is likely to substantially increase Colorado's future water gap.

We now understand that further detail will not be provided in the final water plan but instead in next year's Statewide Water Supply Inventory (SWSI) 2016 update for two key elements. The first of these is an analysis of climate change impacts on water demands, and the second is a quantification of the projected water supplies and demands—and the resulting gaps—assumed in the different scenarios, against which basin implementation plans and future actions are to be measured, but which are now defined by only general, subjective descriptions. Further detail on both of these elements is essential to guide the selection of the policies and actions that will be necessary to meet our state's water needs in a future with a changed climate, and we are pleased that additional work is going forward to provide the state government, basin

roundtables, water providers, and others with the needed detail. We look forward to reviewing and commenting on this work as SWSI 2016 documents are prepared.

We also wish to emphasize the good work of the CWCB in including in the July draft water plan the new chapter 10, Critical Action Plan, outlining actions that the state may take to address future water needs, including climate change impacts. This new section both pulls together previous items from other chapters and also includes new potential actions not included in previous drafts. This draft chapter now provides an essential overall framework for what the state government will actually do going forward to address the water challenges outlined in the plan. This is a great improvement in the draft plan.

We focus the remainder of this third set of RMCO comments on the draft water plan on a single important recommendation, included in our May comments—that the state water plan should include a new action item, the creation of an advisory council to advise the state government on identifying and addressing climate change risks to the state’s water supplies. This was first proposed by the Colorado Water Working Group, Getches-Wilkinson Center, University of Colorado School of Law, in its April comments. The working group recommended that “the Governor establish a task force of climate scientists, water suppliers, water users, and other representative interests to identify those aspects of water use in the state that are most at risk because of climate change and to develop guidance for the basin roundtables and water suppliers and managers for managing these risks.” As we stated in our May comments, RMCO supports this recommendation. We would like in these comments to elaborate on this recommendation and its value.

To begin with, we suggest that this proposed group is better described as an advisory council, not a task force. It is not intended to take decision-making away from state officials, but to provide recommendations to the state.

A new, broadly representative advisory council, with membership reflecting different interests and fields of expertise, focused exclusively on the challenges of climate change to our water resources, is warranted by the scope and complexity of those challenges. The dimensions of those challenges are underscored by what is now happening elsewhere in the West, as other states grapple this year with the consequences of last winter’s snowpack drought and record heat both in the winter and the summer. California’s 2015 snowpack, only five percent of normal, has been judged to be the lowest in the past 500 years. Washington and Oregon experienced normal winter precipitation, but because of unusually high temperatures it fell more as rain and less as snow, and what fell as snow melted early. All three states are now struggling with water shortages and restrictions, agricultural impacts (as estimated \$2.7 billion of farm and ranch losses in California alone), ecosystem disruptions, and wildfires. We in Colorado were spared these impacts by this year’s Miracle May of unusual precipitation. In other years, we may not be so lucky. What is unfolding on the West Coast is the most powerful lesson yet that we face new challenges that will take our best efforts to address.

Fortunately, Colorado is blessed with an abundance of expertise on climate change impacts on our water resources, with many experts in our universities, government agencies, water providers, private sector, and nonprofit organizations. However, we do not yet have a sufficient mechanism to fully draw on that expertise to help the state government shape policy and take other actions to meet our climate change/water impacts. The CWCB’s Climate Change Technical Advisory Group, while important, serves a limited, technical role, primarily reviewing the proposed scope and then the methodologies of relevant state-commissioned studies, rather than considering broad questions of the state’s overall needs (including new policies) in

addressing climate change impacts on water. Continuing the CCTAG is important, and adding a higher-level, policy-oriented advisory council is at least as important.

The existing broadly representative groups that help shape Colorado water decisions and discussions, including both the Colorado Water Conservation Board itself and the Interbasin Compact Committee, do not have either a particular focus on climate change impacts nor the memberships chosen to best consider and address those impacts. Climate change poses great risks to our water resources, and it deserves the more comprehensive and detailed attention that the advisory council offers.

The potential value of a climate change/water advisory council is illustrated by a recent report by a similar body in California, [*Perspectives and Guidance for Climate Change Analysis*](#). Although prepared by a group known as the California Department of Water Resources' Climate Change Technical Advisory Group, this report bears no real resemblance to the work of our state's CCTAG and instead suggests what an advisory council with a higher, broader mandate can do. The California group was created to advise that state's DWR "on the scientific aspects of climate change, its impacts on water resources, the use and creation of planning approaches and analytical tools, and the development of adaptation responses." The group's *Perspectives and Guidance* report provides technical information for the state agency and the state's water providers on the use of climate models and associated technical tools for water resource planning. This kind of comprehensive framing of one important aspect of what is needed to address climate change would be important here, as it is in California. Another part of what an advisory council here could do, recommending adaptation policy responses, would be even more important.

Thank you for the consideration of these further comments from the Rocky Mountain Climate Organization.