



Department of Natural Resources Colorado Water Conservation Board,

Water for Colorado, its nine partner organizations, and the thousands of constituents we represent across Colorado want to thank you for your efforts on the updated Colorado Water Plan. The Water Plan and this update are essential components in our state's efforts to meet the unprecedented challenges we face in addressing water security and river health in Colorado. As Senator Bennet recently stated: "this is a 5 alarm fire."

Water for Colorado originally came together around the creation of the Water Plan in 2015. During that time, we aided in the solicitation of tens of thousands of public comments. Since, we've been actively involved in efforts to secure a long-term, sufficient source of funding for the projects and ideas mapped out in the original plan. It's now our privilege to once again work with you during the plan's update process to ensure it reflects the needs and priorities of Colorado's rivers, watersheds, local economies, recreation and communities.

Following a detailed review of the plan, we'd like to applaud Governor Polis and his administration for the plan's upfront, honest acknowledgement of climate change's impact on Colorado's water supplies. We were also pleased to see the high priority given to green and natural infrastructure strategies and techniques, as well as the inclusion of the River Health Assessment model. The plan's linkage of land use planning with water policy as well as the high priority it places on working with the agricultural sector are all crucial. We thank you for these additions to the plan, and look forward to seeing how they play out in the coming years.

That being said, there are some areas from which we feel the plan could benefit from significant expansion and revision. They fall into eight, key categories, outlined below:

- 1) **The Update Needs Boldness:** The scale and pace of the actions outlined do not meet the urgency of this moment. Colorado is facing its worst drought in a millennium, and as conditions across the Southwest grow more dire, bold, aggressive water management at a state level will only become more important. The 2015 plan detailed a "water gap" by 2050. This update doesn't adequately lay out a strategy to bridge the supply and demand gap, or recognize the ways this gap is increasing with every year. The updated plan needs bold, tangible actions to address water scarcity, in the near and long term.
- 2) **The Update Demands Accountability:** The plan lacks accountability. We find ourselves asking the following questions: What are the metrics? How much do we need to conserve? How much storage do we really need? What are the goals and objectives? How do we measure progress? How do we hold our leaders accountable? The 2015 plan had measurable, achievable, broadly-supported goals. This draft abandons those goals when it should build on them with specifics outlining what we need to achieve by 2030 for a water secure future.



- 3) **The Update Needs Funding:** With a once in a generation opportunity to capture federal and state dollars for water, the update needs to be specific about how the CWCB will ensure that existing and future funding streams are spent strategically to meet river needs, and close the supply and demand gap. Specifically this update should strategize organizational needs and strategy for expanded resource deployment. Additionally, billions of dollars in federal funds for western water are available, competitively via the Bipartisan Infrastructure Law, and this update should address how to capitalize on those funds.
- 4) **The Update Over-prioritizes Traditional Storage:** Traditional storage is overemphasized throughout the update. Building dams to hold water that doesn't exist is not a feasible solution to the water crisis. Rather, we need balanced strategies for innovative storage, efficiency and water savings, water recycling, and creativity to complement storage with nature-based solutions. We need to increase prioritization of forest health and naturally-distributed storage to help nature help itself, increase recreational opportunities, and increase river health and flows benefiting fish and wildlife.
- 5) **The Update Needs to Prioritize Significant Conservation in All Sectors:** The new Plan should include measurable conservation goals in all sectors, including at least 1% per/year conservation in the municipal sector, to ensure that people, Colorado's economy, and rivers continue to thrive in a hotter, drier future. To make certain these goals are met, the state should also make efforts to better understand existing conservation efforts and the potential for more, so that we could have a better understanding of the progress towards meeting the original, 2015 goal and any additional goals.
- 6) **The Update Must Emphasize Healthy Rivers:** The plan focuses on watersheds at a large-scale, but fails to address how individual rivers, streams, and lakes will be protected. The updated plan needs to include specific strategies for protecting and improving flows that support the health of rivers and lakes benefiting fish, wildlife, and recreation. Additionally, the plan needs increased focus on recreation. River-related recreation drives [\\$19 billion a year](#) to the state's economy. The only "infrastructure" this recreation economy has is healthy rivers; without them, the industry and economic benefits dry up. We can't sacrifice fishing, rafting, and other water sports — a strong water plan will find a way to balance the needs of other industries with environmental and recreational needs.
- 7) **The Update Needs Equity, Diversity, and Inclusivity Planning:** While language surrounding the importance of equity, diversity, and inclusion shows up frequently in the plan, strategies to ensure an equitable future for all Coloradans are missing. The plan needs to include actions for being more inclusive of a larger range of voices, especially those historically underrepresented. It also needs actions for working towards creating greater resilience to climate driven drought, floods, and wildfires for the most vulnerable communities.



A water plan that is updated to include these priorities and methods of accountability will not only be stronger and more inclusive, but position Colorado as a region-wide leader in water management. The science shows that we can't plan on or hope for near-term relief from the dire drought conditions plaguing our state, but we *can* build resilience to ensure long-term success and adaptability to climate change.

Thank you for your consideration of these suggestions.

Sincerely,
Water for Colorado and the Undersigned

