

Introduction – me, Donala PPRWA. As the VP, I am representing the PPRWA this evening. PPRWA is a public entity of small water providers in northern El Paso County, whose purpose is to collaboratively work towards sustainability of our water supplies, mainly the declining Denver Basin. We have recently been the recipients of several grants, recommended for funding by the Arkansas Basin Roundtable and funded by the CWCB, to study means to more effectively move and cooperate in our water sources and supplies.

We want to acknowledge the massive amount of work undertaken in the development of the State Water Plan. The countless hours, meetings, and conversations that have occurred since the Governor's Executive Order came out has resulted in what should be considered one of the most important documents to ever be developed in Colorado. We know that attempting to create a plan that addresses all of the water issues facing Colorado in the next 30 years appeared to be daunting at first, but the perseverance of the Basin Roundtables, the IBCC's and the staff of the CWCB have created a very good framework. The PPRWA supports the efforts and the 2nd Draft of the State Water Plan. Our comments presented tonight ^{are} meant to enhance the Plan and not detract from it.

- Streamline permitting

As small water providers, we are the ones who will need to comply with rules and regulations set forth by the State and Federal Governments. Needless delays, reviews and studies all contribute to the cost of delivery of our water to the customers.

The Governor's Executive Order strongly emphasized the plan should recommend ways to streamline water project permitting. PPRWA and others commented on this goal following the first draft, recommending concrete steps to coordinate efforts within the executive branch and with subordinate state agencies. The second draft appears to step back from this important goal, de-emphasizing the whole idea of improving the permitting process.

The plan should recommend: all state agencies, executive branch and subordinates, should work from the same analyses and expert input; decisions by the state agency with primary authority in a particular area (water quality, fish and wildlife mitigation, water rights, etc.) should not be subject to duplicative review by other state agencies; environmental analyses for federal agencies should be used by state agencies without requiring duplicate analyses; projects endorsed by the state should be supported in federal permitting and for funding.

- Conservation and Reuse

The Governor says all conversations should start with conservation, but there's a difference between the conversation and the action plan.

- The IBCC Conservation Subcommittee originated a "stretch goal" of 400,000 additional acre feet of municipal demand reduction, an amount roughly equal to annual use by the

state's largest water utility, the Denver Water Board. This suggestion by a small group of water leaders, endorsed by the plan's drafters, should be vetted by more stakeholders, including those charged with its implementation, before being endorsed by the state. In the plan, Chapter 10, Critical Action Plan, it appears that the "stretch" goal has been modified into a firm goal. In 10.3 III – a, Promote Vibrant and Sustainable cities, the goal is Increase Municipal Conservation and Efficiency by reducing Colorado's projected 2050 municipal water demands by 400,000 acre feet through active conservation, A concern we have is that all achievements are simply relegated to history and are not incorporated or recognized as value added accomplishments. Not only does it simply dismiss those accomplishments, it sets up a disincentive for anyone to do anything not prescribed or mandated by State government since they might simply be discounted and ignored by the State.

Integrated Resource Planning –

We only want to briefly touch on this idea of requiring Integrated Resource Planning as a tool when trans mountain diversions are contemplated. As we understand the ideas floated in the Plan today, all possible sources of extending an existing water supply must be fully implemented before a trans mountain diversion would be considered. This could mean highly restrictive conservation measures (against a community's desires), use and reuse requirements that may have unintended adverse consequences to current downstream users and a requirement for direct potable reuse. It should be noted that under current laws, Colorado does not permit DPR. The plan should recognize this fact, and recommend funding, research, and plans to develop standards and processes for direct potable reuse, recognizing also the important role of the Water Quality Control Commission in maintaining public health and vetting proposals to authorize DPR.

Agriculture

It appears that the main thrust of the State Water Plan is directed at M & I use the smallest percentage of water consumption in Colorado. We encourage further study in how agriculture can be more efficient in the use of the water, along with a mechanism to provide for funding for agricultural irrigation enhancement. We do not buy into the Hatfield and McCoy feud that is commonly portrayed in the media when it comes to Ag and Municipal interests. It is a symbiotic relationship, rather than adversarial. Cities and communities need the food and crops grown by Agriculturists and yet the Agriculturist needs the cities and communities to buy and consume the crops grown. Incentives to become more efficient need to be developed.

Funding – ask Dick to come up and discuss briefly.

I want to thank you for allowing us the opportunity to provide you with our thoughts and ideas. We will continue to participate in the review process in the coming months.

If you have questions, I will do my best to answer them.