

March 17, 2010

Scott Franklin, Moffat EIS Project Mgr
US Army Corps of Engineers
9307 South Wadsworth Blvd, Littleton, CO 80128
VIA Email: Moffat.eis@usace.army.mil

RE: Moffat Collection System Project (Permit Application NOW-2002080762-DEN) DEIS and Section 404 Permit Comments.

Dear Mr. Franklin,

On behalf of the following organizations, I respectfully submit the following comments on the (Permit Application NOW-2002080762-DEN) Draft Environmental Impact Statement (DEIS) and Section 404 Permit, (collectively referred to as the "Moffat" project in this document): Colorado Environmental Coalition (CEC), Western Resource Advocates (WRA), The Nature Conservancy (TNC), Center for Native Ecosystems (CNE), San Juan Citizens Alliance (SJCA), Clean Water Action (CWA), Save the Poudre (STP) and The Sierra Club- Rocky Mountain Chapter (RMC) (see Appendix I for organizational descriptions).

These organizations collectively represent thousands of Colorado citizens, and work jointly to develop and advocate for sustainable water management and supply decisions that conserve, protect and restore Colorado's rivers. In addition to the following comments we also join in the detailed comments provided to the United States Army Corps of Engineers (USACE) by Trout Unlimited, Colorado Wildlife Federation, Center for Native Ecosystems and Western Resource Advocates.

Overview

Our organizations have followed the Moffat project from the earliest stages, in Scoping comments from November, 2003, several of our organizations outlined concerns related to the project. These concerns included the role of conservation in meeting future demand, the need for a full accounting of all environmental impacts from the project, mechanisms to protect stream flows and water quality, cumulative impacts of this project and the Windy Gap Firing Project and that the DEIS analyze and identify a real alternative to new infrastructure for meeting this component of the region's future water needs. Many of the same issues are echoed in these comments.

In 2005, CEC, Western Resource Advocates (WRA) and Trout Unlimited (TU) published the report *Facing our Future*¹. The report conveys the vision of members of the Colorado conservation community for meeting the water needs of Colorado's Front Range for the next 25 years. The report outlines a three pronged strategy to conserve, protect, and restore our rivers and streams, and provides a number of water supply options for the South Platte and Arkansas river basins. These options include: conservation & efficiency, reuse, system integration, and new water supply projects. Among the supply projects listed in *Facing our Future*, the expansion of the Moffat project was listed as a project which our organizations

¹ *Facing our Future: A Balanced Water Solution for Colorado*, Colorado Environmental Coalition, Trout Unlimited & Western Resource Advocates, 2005., http://www.ourcolorado.org/what-we-do/water/resources-links/facingourfuture-2_lores.pdf

saw some potential as a SMART Project². In addition to mechanisms that would improve various water supply projects the organizations which produced the report pledged to work closely with water providers and conservation districts to “achieve higher levels of water conservation and efficiency, to ensure that the new or enhanced water projects described herein fulfill their potential to be smart, and to facilitate the subsequent approval and development of these projects”³. With that commitment in mind our organizations have met with Denver Water staff a great deal over the past several years. We appreciate the opportunities we have had to discuss the Moffat project with Denver Water staff, and recognize the progress made in improving existing Denver Water operations as well as in developing creative solutions within the context of the Moffat project.

While we acknowledge the hard work done on the part of Denver Water, we also respectfully submit the following comments. We hope that these comments can be used to continue our dialogue with Denver Water, permitting agencies and others, as we move through the federal permitting processes. These comments address issues in the Moffat Collection System project DEIS in the context of the requirements of the National Environmental Policy Act and Section 404 of the Clean Water Act, and are grouped as follows:

- I. DEIS Organization & Content
- II. Purpose & Need Statement
- III. Conservation
- IV. Cumulative Impacts
- V. Conservation Pool Concept

I. DEIS Organization & Content

Due to the nature of the USACE website accessing the DEIS the DEIS has been quite difficult for many users, the website prompts security warnings. While users have been assured that the risks are limited, many members of our organizations had difficulty accessing the documents- and were uncomfortable with the warnings, causing some of them to forego utilizing the electronic format of the DEIS. Further the overall organization of the DEIS was confusing for readers and made it difficult to access.

Overall the DEIS is confusing, making it difficult to read and respond to, information is not presented in an intuitive manner. Further technical documents are difficult to read and in some cases missing from the DEIS when it was initially released.

As with many documents of this scope and scale, the DEIS is incredibly complex and technical. Because this document must serve as a complex planning document and as a permit application, the amount of technical information and writing makes it difficult for members of the public to read and understand. In some cases this has led to confusion over what Denver Water is proposing through this DEIS. Plans for operation and mitigation are confusing when present and lacking when needed. Having this information would provide better access to the public in reading and commenting on the document.

Specifically the technical modeling is highly complex, the PACSM model used in the DEIS and lacks clarity on how it is presented in the DEIS. Substantively, one thing we do know

² *Supra n. 1, page 38.*

³ *Supra n. 1, page 3*

about the PACSM model is that it is based upon historic data from the study period 1947 to 1991. Using such stale data to predict hydrology in 2016 and 2030 seems inadequate, especially in light of potential impacts of climate change on hydrology and water diversion patterns. Despite Denver Water's involvement in the Water Utility Climate Alliance and the Colorado Water Conservation Board's recent report called "Colorado Climate Change: A Synthesis to Support Water Resource Management and Adaptation," the DEIS fails to adequately address the potential impacts of climate change. If impacts from climate change are foreseeable, as the above-mentioned organizations have found, they should be carefully considered by the DEIS. As part of that consideration, the PACSM model should use the most recent climate and hydrologic data available, rather than use a data set that hasn't been updated in twenty years. In general the information produced by the PACSM model should be updated and presented in a clearer manner.

II. Purpose and Need Statement

The purpose of the Moffat Collection System Project is to develop 18,000 acre feet per year of new annual firm yield to the Moffat Treatment Plant and raw water customers upstream of the Moffat Treatment Plant pursuant to the Board of Water Commissioners' commitment to its customers⁴

In the DEIS Denver Water outlines four key elements of its need to expand storage: reliability, vulnerability, flexibility and firm yield. Per the DEIS these elements are outlined in the context of Denver Water's Integrated Resource Plan (IRP). Because the Purpose and Need Statement has been written so narrowly, it leaves only a few options that can realistically meet the "needs" outlined in the DEIS, especially as each of these needs are treated as equal. The four needs bear equal weight under the DEIS, and as such drive the conclusion that the expansion of the Moffat Collection System is the only viable alternative. Yet there is little in the DEIS, if anything, to provide an independent assessment that these needs should all be equally weighted.

Additionally, the purpose and need statement was developed more than 5 years ago, following closely on the heels of a severe drought. Since that time, Denver Water users have made significant shifts in how water is used. For example, demand from Denver Water customers was reduced by approximately 30% in the years following the 2002 IRP, and these changes appear to be permanent and not merely a "drought shadow". As a result, Denver Water has accelerated its conservation goals such that it intends to conserve 29,000 AF by 2016, which, as discussed below, is 13,000 AF more than the conservation estimate assumed in the DEIS. Because of these changed use patterns it seems clear that the assumptions and predictions upon which the purpose and need statement was based may no longer accurately reflect the needs of Denver Water. Indeed, these accelerated conservation savings alone could meet the vast majority of the needs identified in the DEIS. Further the DEIS reinforces what our organizations have heard in other forums, that customers of Denver Water are unwilling to further change their water usage. This is a flawed assumption, especially as it assumes that customers are more likely to accept the increasing costs of rates which will fund the Moffat project, than they are to accept periodic (once every 20-30 years) restrictions of outdoor watering. In addition

⁴ U.S. Army Corps of Engineers Omaha Division (USACE). 2009. Moffat Collection System Project Draft Environmental Impact Statement (DEIS), p. 2-1.

to finding this assumption flawed, there is little information in the form of surveys or studies with customers available in the DEIS to clarify where this thinking comes from. Practical experience demonstrates to the contrary that Denver Water will impose restrictions and customers can and will reduce demand during times of water shortage.

Overall the DEIS lacks detail on how conservation will occur under Denver Water's proposal, while listed as a source for half the water needed to meet their "gap" in 2030, there is little information about how this conservation will occur. That information should be reflected in the EIS process moving forward. We join the comments provided by WRA, regarding the Purpose & Need Statement in the DEIS.⁵

The DEIS states that many concepts, specifically non-structural alternatives were eliminated from the No Action Alternative "because they did not meet the Purpose and Need"⁶. The No Action Alternative is by definition not supposed to meet the Purpose and Need; therefore, any No Action Alternative should not be constrained by the Purpose and Need. Numerous non-structural and institutional water management concepts were eliminated using screen 1A. Specifically this screen eliminated Alternative 302: Integration with Northern. This alternative would potentially meet a number of the needs (if not all) listed by Denver Water in the DEIS, especially in conjunction with other measures such as increased reuse, conservation or other alternatives that have been screened out.

Because the No Action Alternative has been artificially narrowed by the requirement that all options meet the purpose and need, the DEIS is left with just two options: 1. use its strategic water reserve, or 2. enact more frequent water use restrictions. Not only are these not the only options available to Denver Water, but these two options are poorly described in the DEIS.

III. Conservation

On the whole, Denver Water deserves great credit for the leadership it has played on Conservation in Colorado and around the west. But, the DEIS lacks adequate information about what role conservation will play in meeting Denver's future needs. To their credit, Denver Water has developed numerous conservation methods, from rebates to public outreach, which are cost effective ways to conserve water. Many of these methods are organized clearly on Denver Water's website, in Denver Water's Tap-Smart Conservation Plan and additional emergency measures are outlined in Denver Water's Drought Response Plan and Denver Water staff have also been very willing to discuss their plans for conservation. Unfortunately, many of those measures and how they may continue to play a role in Denver Water's future are not adequately addressed in the DEIS.

As outlined in the comments submitted by WRA⁷ the use of "unrestricted demand" as a basis for establishing a need for the project is inconsistent with the sentiment of Denver Water Customers, and with ongoing and past operations of Denver Water. In times of shortage Denver Water and its customers have responded by curbing use significantly.

⁵ Western Resource Advocates, Moffat Collection System Project Draft Environmental Impact Statement (DEIS) and associated § 404 Permit Application, Section 2

⁶ USACE 2009 DEIS Chapter 2: Proposed Action and Alternatives, p. 2-84

⁷ *Supra n. 5* and Section 3

The 2002 drought provides a clear example of this response. While Denver Water staff has highlighted the 2002 drought as evidence of the system's vulnerability, on the contrary, the 2002 drought and the response (along with lessons learned) actually shows that Denver Water customers are willing and able to promptly respond in times of shortage, creating more elasticity in Denver's water supply.

Per the DEIS, 16,000 AF of supply is expected to be realized through water conservation by 2030. However, as mentioned above, Denver Water actually expects to achieve these conservation savings, plus another 13,000 AF, by 2016. That is, the DEIS assumes only 16,000 AF of conservation by 2030, when it should assume 29,000 AF of conservation by 2016. Consistent with this expectation, Mayor Hickenlooper announced in the 2006 State of the City Address that the City and County of Denver, in partnership with Denver's Board of Water Commissioners, "intends to embark on the most aggressive water conservation program in the history of Colorado" seeking to achieve "a 22% reduction in system-wide water use in the next decade – accelerating their original 2050 goals by 35 years." In 2006, the Board followed through by setting a conservation goal to reduce water use to 165 gallons per person per day by 2016 by implementing the "Tap-Smart" Conservation Plan. This represents a 22% reduction from average pre-drought use of 211 gallons per person per day. Considering Denver's historical success and future commitments, Denver can and will meet conservation savings of 29,000 AF by 2016.⁸ The DEIS should acknowledge this accelerated schedule for conservation and reevaluate the purpose and need for the Moffat project in the proper context.

In addition to the accelerated conservations savings that were not adequately considered in the DEIS, the DEIS also fails to acknowledge the role of drought restrictions in narrowing the gap between supply and demand in times of shortage. The DEIS assumes that Denver Water will have to meet unrestricted demands in the future, totaling 420,000 AF at build-out (not including a 30,000 AF safety factor). This is a faulty assumption because the projected demand of 420,000 acre feet does not account for reductions in demand due to drought restrictions that will be imposed by Denver Water in dry years. Contrary to the assumption in the DEIS, Denver Water's build out demand during drought conditions will be less than 420,000 AF. For example, due to drought restrictions, Denver targeted a 30% reduction and actually achieved a 28.9% reduction in water use during the "moderate" drought of 2001 to 2004. If "moderate" drought conditions occur in 2050, according to Denver Water's Drought Response Plan, it will target a 30% reduction in demand, equivalent to approximately 126,000 AF.⁹ Thus, during "moderate" drought conditions at build-out, the targeted demand will be 294,000 AF, not 420,000 acre feet.

Given the above, the DEIS should include additional modeling including the imposition of "moderate" conservation measures (expected to provide a permanent water supply of 29,000 AF by 2016), and imposition of the drought response measures set forth in the Drought Response Plan. Contrary to the "unrestricted demand" scenario that the DEIS currently assumes, these are the expected future circumstances under which Denver Water will operate.

Like the lack of detail and failure to acknowledge the pivotal role of conservation and drought response measures, there is also insufficient detail on how Denver Water might continue to utilize and expand its Reusable Water infrastructure to meet future demands.

⁸ Denver Water, Tap-Smart: The Conservation Master Plan, April 30, 2007.

⁹ See Denver Water, Drought Response Plan, Appendix to 2002 IRP.

Many of the alternatives around Reuse were screened out (See above section on purpose and need and No Action Alternative), however the market for Denver Water's reuse water continues to grow and will in all probability play an increased role in the future. Because of the lack of detail surrounding how the reuse operations may be utilized it is difficult to assess if Denver Water's reuse operations can truly help address the needs stated in the purpose and need.

IV. Cumulative Impacts

The statutory requirements of the National Environmental Policy Act (NEPA), Clean Water Act (CWA) and Council on Environmental Quality (CEQ) regulations (40 C.F.R. §1508) require that the DEIS include a full analysis of connected, cumulative and similar actions as well as direct, indirect, and cumulative impacts. However, as written the DEIS is misleading about what the impacts will be once this project is online. The DEIS does not consider what impacts development occurring between today and 2016 will have on the stream, and assumes that virtually no impact will be seen to the aquatic environment. This artificial baseline flow, thereby ignores the foreseeable likelihood that additional operations such as the Windy Gap Firming Project (WGFP) will come online before (or simultaneous to) the Moffat Project. Especially in light of the fact that the DEIS on the WGFP was released prior to the DEIS for the Moffat Project, the cumulative impacts of the two projects should be assessed under the assumption that the WGFP lies within that reasonably foreseeable future. Please refer to Trout Unlimited's comment letter specifically Section I regarding Cumulative Impacts.

In addition to the lack of an analysis by the Corps, Denver Water, and the 3rd party consultant, the DEIS also fails to include existing assessments of the cumulative impacts of the Moffat Project and WGFP. Since 2006, Grand County has been working to complete the Grand County Stream Management Plan. This plan provides a range of flows which will support fisheries. This information was not included or considered by the DEIS. It is our understanding that since 2006, Grand County officials have offered to provide the Plan to Denver Water and had requested it be included in the DEIS, inclusion of this Plan or this type of analysis would have provided a better cumulative impact assessment. While this information is new, and came after portions of the DEIS were written, initial phases of the plan were completed well before the release of the Moffat DEIS.

Many of the areas of concern around the cumulative impacts deal directly with flows. While the DEIS deals with both baseline flows and low flows (albeit insufficiently) there is little analysis of the impact to peak flows. Seasonal flushing flows, peak flows and channel maintenance flows have historically been vital to maintaining the health of the Fraser River. Despite the DEIS assumption that the majority of the Moffat Project diversions will occur during times of peak flow, during average to wet years, thereby cutting off the top of the hydrograph, the DEIS fails to adequately address the project's impact on peak flows. A thorough assessment of the impacts on peak flows and associated mitigation measures should be included in the DEIS.

Like peak flows the DEIS also fails to adequately assess the impacts on water quality. Were Denver Water operating in a vacuum on the Fraser River, this project might not result in additional water quality impacts. However, both the current operations on the Fraser and those proposed under this project operate in the same reality as other major transbasin diversions, and alongside local water supply efforts in the Fraser River Valley.

All of these projects have cumulative effects on the water quality in the Fraser River. The DEIS fails to properly assess all impacts related to water quality. Increased water temperatures, sedimentation, and increased concentration of nutrients in the Fraser River should all be assessed further in the DEIS.

On the whole, water quality issues are not sufficiently analyzed. The river system faces three main quality concerns: (1) high concentrations of nutrients and toxins, (2) increasing temperatures, and (3) increasingly effluent dependent stream flows. These three areas present unique challenges for the Upper Colorado and tributaries such as the Fraser River and the Williams Fork, and all are directly related to the reduction of flows. The DEIS should include a stronger assessment of water quality, including additional data from stations located further downstream of the project. The majority of sampling sites for the data referred to in the DEIS are located fairly high up in the system, with the lowest collection point at Tabernash. Because many of the water quality impacts of this project are shifted to downstream users as a result of diminished flows, additional sampling sites should be included downstream. Additionally, as outlined in the Cumulative Impacts section of this document, a more robust analysis of how cumulative impacts of projects relate to water quality is needed.

While the project does not include a clear assessment of the cumulative impacts outlined above, the DEIS does discuss collaborative negotiations between Denver Water and other entities:

In addition to the proposed mitigation measures, Denver Water is pursuing additional environmental enhancement opportunities separate from, but in some instances parallel to, the EIS process that will provide additional benefits to the environment and other West and East Slope Interests.¹⁰

As stated these conversations are in some instances parallel to the DEIS and will potentially provide additional benefits. These conversations and opportunities should be included in the DEIS, and be subject to public review and comment. Because few details are known about many of these potential opportunities, members of the public are not able to review them and discuss whether they are merely “enhancement” efforts or if they fit into “Mitigation”.

V. Recreation

Recreation is not only a chief reason that hundreds of thousands flock to Colorado on an annual basis, it is a key driver to many of our local communities. On the West Slope impacts to recreation center around reduced flows. Lower flows will likely lead to a reduction in most recreation activities including fishing, kayaking and rafting. Groups such as Colorado Whitewater Association and several individual recreationists voiced concerns at the Summit and Grand County meetings regarding the reduced recreational activities.

Recreationists also provided comments at the Front Range meetings in Boulder and Denver. The predominant concerns voiced by those individuals in these forums centered on impacts to the stream reaches above Gross Reservoir. Concerns have been raised that the impacts outlined in the DEIS fail to assess impacts to the stretch of South Boulder Creek, specifically the lower end of a popular recreational run above the reservoir which is home to a rapid known as the RIMBY (Right In My Backyard) rapid. This section is a Class

¹⁰ USACE 2009 DEIS Executive Summary, p. ES-48

IV and is renowned on the Front Range as one of the few challenging runs for expert boaters, and is especially attractive because of the close proximity to the metro area. Several kayakers have raised concerns that the expansion of Gross Reservoir will lead to the inundation of this section, and that the impacts of that inundation are not adequately addressed in the DEIS.

Finally, we have also heard from Denver Water Staff with regard to the Conservation Pool concept (discussed below). Should this pool become a reality, the CAC recognizes that recreational benefits might be realized as a result of increased flows on South Boulder Creek below Gross Reservoir.

VI. Conservation Pool

Our organizations appreciate the creativity put forth by Denver Water Staff in developing the concept of a Conservation Pool. We agree that when possible our water supply systems should be utilized in a manner by which we can realize multiple benefits. This effort could provide additional benefits to both recreation and fisheries downstream of the reservoir. However, this concept should not be motivation to move the project forward, but rather a benefit to be realized should the project move forward after addressing other impacts.

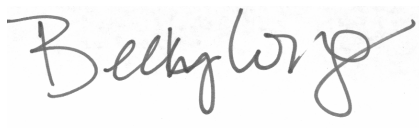
VII. Climate Change

The DEIS lacks an assessment of what the impacts of climate change might be on this project. From our conversations with Denver Water we know that they are working to actively follow as many as 15 climate change models. We have heard from them that those models lack agreement on precipitation forecasts, however it is rational to assume that the Upper Colorado River will see some impacts under climate change. Precipitation, temperatures (both ambient and aquatic) may likely rise, and other natural uses of water are likely to suffer. It is incredibly important that the DEIS accurately describes how the proposed alternatives will be impacted by and contribute to climate change.

Conclusion

Our organizations have spent an extensive amount of time over the past several years following this project. Our collective members hail from all corners of our state, many live in communities who will deal with the front line impacts of this project, while many others live in urban areas driving the need for new development. We are not advocating through our comments that the USACE should deny this permit. We are however asking that the above listed issues are adequately addressed through the USACE's response to public comments in the Final EIS. Should the project move forward, we ask that the permit conditions are clear and reflect the needs not only of Denver Water ratepayers, but of their neighbors statewide as well. Until all impacts of the project have been adequately assessed and addressed our organizations cannot provide additional conclusions.

Sincerely,



for

Becky Long, Water Caucus Coordinator
Colorado Environmental Coalition

Drew Beckwith, Water Policy Analyst
Western Resource Advocates

Adam Bergeron
The Nature Conservancy

Megan Mueller, Staff Biologist
Center for Native Ecosystems

Meghan Maloney, River Campaign Director
San Juan Citizens Alliance

Gary Wockner
Clean Water Action

Mark Easter
Save the Poudre, Poudre Waterkeepers

Steve Glazer, Water and Aquatic Resources Committee, chairs
Sierra Club- Rocky Mountain Chapter

Appendix I:

Colorado Environmental Coalition (CEC): Founded in 1965, the Colorado Environmental Coalition has worked to unite Coloradans to protect our natural heritage and quality of life. With over 4,000 members and 85 partner groups from across the state, CEC is dedicated to protecting Colorado's wild places, advocating for renewable energy policies, promoting responsible water initiatives, leading the way in securing mass transit and developing sensible growth plans, and providing technology expertise to partner non-profits.

Western Resource Advocates (WRA): A regional nonprofit organization dedicated to protecting the Interior West's land, air, and water. We promote river restoration and water conservation, advocate for a clean and sustainable energy future, and protect public lands for future generations. We meet our goals in collaboration with other environmental and community groups, and by developing solutions appropriate to the environmental, economic and cultural framework of the southwestern United States.

The Nature Conservancy (TNC): TNC is an international, nonprofit organization dedicated to the conservation of biological diversity. Our mission is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. Conservation work, based on sound science and strong partnerships with public and private landowners, is carried out in all 50 states and in 27 countries. TNC has helped conserve nearly 15 million acres of land in the U.S. and Canada and more than 102 Million acres with partner organizations globally. TNC has protected over 600,000 acres in Colorado.

Center for Native Ecosystems (CNE): CNE is a nonprofit advocacy organization formed in 1999 dedicated to conserving and recovering native and naturally functioning ecosystems in the Greater Southern Rockies and Plains. We value all of the ways that humans benefit from protecting native biological diversity, including; clean water and fresh air, healthy human communities, sources of medicines and foods, and recreational opportunities. We also passionately believe that all species and their natural communities have the right to exist and thrive. CNE uses the best available science to forward its mission through participation in policy, administrative processes, legal action, public outreach and organizing, and education. We have approximately 300 members throughout the region and elsewhere.

San Juan Citizens Alliance (SJCA): Founded in 1986, the San Juan Citizens Alliance is a grass roots organization dedicated to social, economic and environmental justice in the greater San Juan Basin. We organize San Juan Basin residents to protect our water and air, our public lands, our rural character, and our unique quality of life while embracing the diversity of our region's people, economy and ecology.

Clean Water Action (CWA): Clean Water Action is an organization of 1.4 million members working to empower people to take action to protect America's waters, build healthy communities and make democracy work for all of us. For 36 years Clean Water Action has succeeded in winning some of the nation's most important environmental protections through grassroots organizing, expert policy research and political advocacy focused on holding elected officials accountable to the public.

Save the Poudre, Poudre Waterkeeper (STP): Save the Poudre is a coalition of 17 national, statewide and regional groups whose mission is to protect and restore the Cache la Poudre River of northern Colorado.

The Sierra Club- Rocky Mountain Chapter (RMC): The Sierra Club, who's mission is to explore, enjoy and protect our natural resources, has over 630,000 members nationwide and over 18,000 members in Colorado (The Rocky Mountain Chapter). Many of our members live and recreate in the areas affected by the Moffat project and are rate payers of Denver Water. We have an interest in making sure this proposal is adequately evaluated and impacts recognized and mitigated.

cc: U.S. Environmental Protection Agency, Region VIII
Colorado Department of Natural Resources
Colorado Division of Wildlife
Colorado Wildlife Commission
Colorado Water Conservation Board
U.S. Senator Udall
U.S. Senator Bennet
U.S. Representative Salazar
U.S. Representative Polis
U.S. Representative Degette
U.S. Representative Perlmutter
State Senator Al White
State Representative Randy Bumbgardner
Denver Mayor John Hickenlooper
Denver Water Board
Grand County Board of County Commissioners
Summit County Board of County Commissioners
Colorado River Water Conservation District Board
Northwest Colorado Council of Governments