



March 14, 2013

Bureau of Reclamation  
Attention: Ms. Pam Adams, LC-2721  
P.O. Box 61470  
Boulder City, NV 89006-1470

RE: Bureau of Reclamation Colorado River Basin Supply Study

Dear Ms. Adams,

Thank you for the opportunity to comment on the *Colorado River Basin Water Demand and Supply Study* released in December 2012. We believe the study is a positive and significant step in identifying issues and priorities for the multitude of demands on the Colorado River. We applaud the Bureau and the basin states for their immense work over the past few years to complete the study.

In our review of the option portfolios, NCPA fully endorses two strategies:

- Portfolio A is a common sense strategy including water conservation for agriculture and urban areas, water use, and replacing existing power plants with more efficient plants. We believe these cost effective strategies should be implemented immediately to kick start the mitigation of the identified water gap.
- Portfolio C focuses on options that optimize water management administration including the compact as well as options that preserve river flows. We feel the options presented in this portfolio are reasonable to implement and inexpensive in comparison to the large infrastructure projects listed in Portfolio B.

NPCA recognizes that the study's purpose was to create a common foundation to begin to address the identified supply and demand imbalances in the basin. We applaud the effort to begin to analyze and incorporate healthy river needs into water management planning via environmental and recreational flow needs. NCPA and American Whitewater are working in collaboration to create additional information related to recreational boating flows through Canyonlands National Park and aim to incorporate this information into future basin study discussions.

**Southwest Regional Office**

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NPCA is, however, disappointed that the study did not have greater consideration for America's national park resources and that the National Park Service did not have a strong voice in the Study. The parks and recreation areas that call the Colorado River basin home are all dependent upon the river for their sustained quality. They are not only iconic park lands; they are also significant economic engines for the region. Parks make nearby communities more attractive and spur economic success. Research shows that for the last forty years, counties adjacent to national parks perform 3-7 times better than the nation in terms of employment growth and per capita income growth.

The identified workgroups for the next steps discussion about the Study provide a significant opportunity to incorporate the resource needs of America's national parks. We hope that the workgroup process is designed to fully incorporate all stakeholders and foster open, transparent dialogue. We are certain that incorporating NPS staff into issue focused workgroups as workgroup chairs and/or participants will ensure greater discussion about how the Study's options and strategies intersect with national park resources.

We look forward to learning more about the next steps discussion process and actively participating in discussions to protect America's best idea, our national park system.

Sincerely,

David Nimkin  
Senior Regional Director  
Southwest Region

**Southwest Regional Office**