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Antonito, CO 81120

Commissioner Lora L. Thomas
100 Third Street
Castle Rock, CO 80104

2022-01-04

Dear Commissioner Thomas,

As a Douglas County Commissioner, you have significant influence over the future of you county and its neighbors. Among your most important decisions, you must choose whether to buy or reject the $828 million water pipeline proposal from "Renewable Water Resources" (RWR).

Their 27-page proposal has only one page of unquantified and unsourced explanation of their "rim recharge" theory. The remainder of the proposal is logically sound, but axiomatically founded in this notion: that all water removed from the valley will be magically replenished at a 1:1 ratio. For example:

> "There will be no impact to the Rio Grande Compact as a result of the RWR project as, not only will pumping be replaced on a 1:1 basis, it is proposed that the augmentation water to offset depletions from the project will exceed the depletions."

Weasel words like "it is proposed" intend to mask the entirely theoretical nature of these hydrological models. No numbers are provided for the amount of replenishment/augmentation, but USGS data show that well-water levels in the San Luis Valley are dropping. How is this explained by the rim recharge theory? Where will Douglas County find the water to replenish the valley aquifer if this model is incorrect?

Even if rainfall replenishment estimates had been provided, they could never accurately predict future rainfall in an already-fragile desert ecosystem. Neither has any proof been given for the claim that tapping into the confined aquifer will have no effect on the unconfined aquifer and the geological stability of the land above it.

RWR's proposal is built entirely on a house of cards: unknown and stochastic geological formations. It is a risky investment, and, as such, necessitates critical assessment: among the three players in the deal - Douglas County (DC), the San Luis Valley (SLV), and the RWR - DC and the SLV seem to assume all of the environmental and financial risks while the RWR is legally shielded from substantial repercussion.

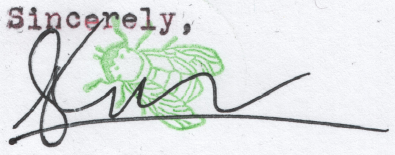
What if the SLV dries up? It's not impossible, as water exports largely dried up Crowley County and decimated its agricultural industry. In such a case, the water courts will undoubtedly see that DC and the RWR are held liable for the SLV's decline. The

SLV will be ruined, DC taxpayers will be burdened, and the RWR will declare bankruptcy and skip off into the sunset with their sacks of cash. Clearly, the RW#R can not be trusted to determine whether their scheme will even work of not.

The water courts and governments are not unaware of the proposal's flimsy hydrographic basis. The Rio Grande Water Conservation District Board assessed it in 2019 and determined it ecologically dangerous. The plan requires approval and permits from numerous local governments, water courts, the state, and the Rio Grande Water Compact. Despite the proposal's unfoundable assurances that it will breeze through the courts, there is significant historical precedent that it won't. The further it moves through the system, the more taxpayer and private money and resources will be thrown into this hole.

For this reason I implore you to stop the buck here. Don't divert $20 million of public money to fund the legal fees and marketing of this con. Reject it and force these looters to put their business resources toward industries that are actually sustainable to all parties. I encourage you to invest the federal relief funds in wastewater recycling plants. An investment in such would provide zero risk to public entities and would create longer-lasting jobs than a pipeline would. Wastewater recycling is thoroughly proven to be safe and efficient: compare that to the climatological and geological uncertainties of the RWR propopal. Don't use taxpayer money to speculate on their BS.

Sincerely,



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