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**From:**

**Sent:** Friday, October 07, 2011 5:15 PM

**To:**

**Cc:**

**Subject: RE: NEW -**

This is also interesting because, although the Hicks article mainly focuses on the qualified conservation contribution of a partial interest in an appropriative or riparian right, it does state on page 105 that "a donation of an entire interest in an appropriative right will likely be rare" and CO law is included in the survey, so why does [redacted] focus on this in his memo. His argument should instead be that the qualified conservation contribution exception applies?