

APPENDIX B
PUBLIC EDUCATION MATERIALS
AND PUBLIC COMMENTS



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To: Hanna Sloan
Engineer, AMEC

From: Marsha Daughenbaugh, Executive Director
Community Agriculture Alliance

Subject: Yampa-White-Green Rivers BIP Outreach Report

July 24, 2014

Basin Implementation Plan Outreach for Public Review and Input

Notification Included:

Print Ads in Craig Press and Steamboat Pilot

Radio Ads and PSAs on KRAI

Email postcards (for further outreach distribution) to:

Round Table members, three county + eight community governments, chambers of commerce, CSU Extension offices, 36 different organizations in Moffat, Rio Blanco and Routt Counties

**YAMPA-WHITE-GREEN RIVERS BASIN ROUND TABLE
IS SEEKING PUBLIC INPUT ON THE
BASIN IMPLEMENTATION WATER PLAN**

The document can be found on the Colorado Water Conservation Board (CWCB) website at:

<http://www.colorado.gov/pacific/cowaterplan/yampa-white-green-river-basin>

Written comments may be submitted in any of the following ways:

1. Add comments to the documents from the CWCB website and email to hillary.king@amec.com by July 21 (preferable way)
2. Print, mark-up the documents, scan and email to hillary.king@amec.com by July 21
3. Email comments to hillary.king@amec.com by July 21
4. In Person: Round Table Meeting, Wednesday July 23, American Legion Hall, Craig; 6PM

The Yampa-White-Green Basin Implementation Plan will become a part of the Colorado Water Plan.

Information about the Colorado Water Plan can be obtained at the CWCB web link:

www.coloradowaterplan.com

Public review and input is encouraged and will be reviewed by the Yampa-White-Green Round Table at their October 15, 2014 meeting.

**YAMPA-WHITE-GREEN RIVERS BASIN ROUND TABLE
IS SEEKING INPUT ON THE BASIN
IMPLEMENTATION WATER PLAN**

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www.colorado.gov/pacific/cowaterplan/yampa-white-green-river-basin

Written Comments may be submitted in any of the following ways:

1. Add comments to the documents from the CWCB website and email to hillary.king@amec.com by July 12 (preferred).
2. Print, mark-up the documents, scan and email to hillary.king@amec.com by July 21.
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**Yampa-White-Green BIP
Response to Public Comments Matrix**

Commenter Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
S. Foi		2/18/2014	Employ "trickle irrigation" around Routt Co.; create "run-off reservoirs" in areas in need of water; develop "greywater systems for underdeveloped areas"; create wetlands for migrating waterfowl and wildlife.			
Allen Hischke		2/20/2014	Attended Roundtable Meeting February 19, 2014. The best way to assure that Moffat Co. will have a good supply of water: 1) "conserve every drop that we can"; 2) eliminate the USFWS programs; 3) build Juniper Cross Mountain Reservoir			
John Ayer		2/21/2014	Attended Roundtable Meeting February 13, 2014. As a Routt County Planning Commissioner, would encourage each county and municipality to review its Master and Land-Use Plans to ensure that it is aligned with the Colorado Water Plan. This would encourage grassroots participation and buy-in to the CWP.			
Robert L. Tobin	USGS Hydrologist (retired)	2/24/2014	Plans for effective and optimal water management for the beneficial uses by residents within a river basin should include water quality and quantity information. The YWG BIP does not address these issues. A USGS summary report of water quality characteristics and variations for a 15 year period for the White River was included with the comment.			
Anthony D'Aquila		3/12/2014	GOAL #1: No new inter-basin transfers or withdrawals from the Yampa/White/Green River Basin unless all reasonable alternatives have been fully implemented, to include water conservation programs, demand management programs, tiered water pricing policies, and reclaim / re-use programs.			adaquila@tampabay.rr.com
			GOAL #2: The Colorado Legislature to establish and approve mandatory daily water consumption goals for every public and otherwise regulated water utility in the state to strive to achieve. Recommended goal is 120 gallons per person per day or less.			
			GOAL #3: That Colorado's state and federal legislators will represent these goals in their negotiations with our neighboring states, the federal government, and the various regional and national planning and water regulatory commissions and agencies. State and federal legislators should object to additional out-of-state water supply commitments from Colorado unless receiving entities have likewise adopted more stringent water conservation and demand reduction measures.			
			GOAL #4: Water policy and planning in our Yampa-White-Green Basin and preferably state-wide must be integrated and holistic, considering the full spectrum of impacts and benefits to ecosystems, communities, and businesses.			
Ben Beall	Yampa River System Legacy Partnership / America's Great Outdoors	3/14/2014	GENERAL PRINCIPLES: Protect the flows in the Yampa River and its tributaries, all of which support agriculture and the outdoor and water-based recreation economies of communities found throughout the Yampa River Basin. (Requirement One of Gov. Hickenlooper's Executive Order for the CWP.)			

**Yampa-White-Green BIP
Response to Public Comments Matrix**

Commenter Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
			Protect the flows of the Yampa River and its tributaries in order to protect the natural resources and ecology of Northwest Colorado for future generations. (Requirement Three of Gov. Hickenlooper's Executive Order for the CWP.)			
			Protect current and future flows of the Yampa River in light of the potential effects of Compact Calls or climate change.			
			SPECIFIC PRINCIPLES: Protect agricultural water in order to preserve agricultural lands. • Encourage preservation of irrigated agricultural lands through voluntary, incentive-based programs such as conservation easements and alternative agricultural water transfer methods (interruptible supply agreements).			
			Protect the flows of the Yampa River to preserve the native riparian habitat that supports native (and non-invasive, non-native) fish and native birds and native wildlife. • This includes protection of the globally rare riparian habitat found along certain reaches of the Yampa.			
			Protect the flows of the Yampa River in order to ensure the survival of the four endangered fish. • Support the goals of the Endangered Fish Recovery Program and the agreement captured in the Yampa River Programmatic Biological Opinion (1999-2000).			
			Protect the flows of the Yampa River to ensure both existing and future recreational opportunities will be viable throughout the entire reach of the Yampa River, including opportunities for boaters, hunters, anglers and wildlife watchers. • The rapidly expanding outdoor recreation industry based around the Yampa River (recreation, retail, manufacturing and travel-related businesses) is a significant component of the Northwest Colorado economy.			
Kevin McBride	Upper Yampa Water Conservancy District	4/15/2014	April 15, 2014 Letter from John V. Redmond approving of the process of the Upper Yampa Water Conservancy District, Yampa-White-Green Basin Roundtable's White Paper. Identified need for equitable apportionment, opposes trans-mountain diversions from CO River Basin			
Stephanie Scott	Colorado Trout Unlimited	5/2/2014	Proposed 4 guiding principles for the State of Colorado as a whole: 1. The Colorado Water Plan must include meaningful efforts to protect and restore healthy rivers and streams and environmental and recreation uses of water.			
			2. Basin implementation plans need to help refine the municipal supply "gap" at a local level.			
			3. Filling the municipal water supply gap requires a balanced strategy emphasizing efficient use of Colorado's limited water supplies. 3.a. High water conservation targets should be reflected in basin implementation plans. 3.b. Water re-use should be an increasing part of meeting future water needs. 3.c. Alternative transfer mechanisms and improved agricultural efficiency should be used to meet growing needs while maintaining agriculture and protecting Colorado's environment. 3.d. Better integration of water supply systems can help increase efficient use of Colorado's water. 3.e. Structural projects to bolster water supply should avoid harmful effects to rivers and local communities. 3.f. A new large trans-basin diversion from the Colorado River is not the answer for meeting Front Range needs.			

**Yampa-White-Green BIP
Response to Public Comments Matrix**

Commenter Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
			4. Laws and policies to facilitate creative water management should be encouraged.			
Marsha Daughenbaugh	Community Agriculture Alliance	6/18/2014	Agricultural water rights in Northwest Colorado should be protected and enhanced by the CWP. Existing agricultural water rights, both pre-Colorado River and post Compact water rights, must be protected.			
			Agriculture in Northwest Colorado must be viewed equally with agriculture and industry throughout the state of Colorado. The agricultural interests in one part of the state should never be elevated over the agricultural interests in another part of the state.			
			Agriculture water rights in Northwest Colorado proved a cornerstone of all other economies in the region; recreation, environment, retail, social, municipal, residential and industrial. Agriculture water must be protected and enhanced for the other sectors to succeed.			
			Future agricultural needs in Northwest Colorado must be considered and planned for in the CWP.			
			The principal of equal apportionment of water resources throughout the state must be a corner stone of the CWP to protect the Yampa, White and Green basin in Northwest Colorado from disproportionate impacts of a Colorado river Compact call.			
			Any consideration of the "New Supply" in the form of transmountain diversions from the West Slope to the East Slope should not threaten western slope water rights, including increasing the chances of a Colorado River Compact call.			
			The CWP should promote water conservation in each basin to fully utilize the available water supply within each basin before any "new supply" trans-basin diversions are considered. Under no circumstances should agriculture be penalized for more efficient water use methods.			
			The importance of non-consumptive benefits provided by flood irrigation should not be underestimated in the CWP. The historic use of agriculture water rights provides a river flow regime that helps maintain wetlands, recharge alluvial aquifers, provide late season flows to downstream users and augment minimal stream flows which help mitigate environmental concerns, including threatened and endangered species.			
			Water quality and quantity are inextricably linked. Therefore, water quality as well as quantity must be considered a fundamental goal of the CWP. The health of all stakeholders can only be served if the quality of the water continues to support healthy agriculture and ecosystems through which it flows.			
			Future municipal and industrial water supply projects that incorporate agricultural and non-consumptive water supplies must be prioritized over single- or limited-use water supply projects.			
			The stewardship that agriculture continues to provide to wildlife and riparian habitat through the use of Best Management Practices (BMPs) by maintaining open space through authentic working landscapes and conservation easements must be protected and enhanced in the CWP.			

**Yampa-White-Green BIP
Response to Public Comments Matrix**

Commenter Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
John Adams (submitted by Thomas Korver)		7/21/2014	In summary, the Morrison Creek Reservoir is inconsistent with the goals of preserving agriculture and agricultural water use and no demonstrable need for Morrison Creek Reservoir should be fully demonstrated, and the impacts of the Reservoir should be fully addressed, before there is any further consideration of the Reservoir as an IPP. Unless such additional analysis is undertaken, Morrison Creek Reservoir should be removed from the IPP list.			tkorver@petros-white.com
Kari Harden (on behalf of Lou Dequine, the Germaine family, and Kim Singleton)		7/21/2014	<p>As the landowners (for multiple generations) of close to 90 percent of the property proposed for conversion into Morrison Creek Reservoir, we are open to the idea of the project on the condition that it operates and functions in a manner that is reasonable, respectful, sustainable, and aesthetic. We have been in discussion with the Upper Yampa Water Conservancy District (UYWCD) for many years about the potential reservoir, and as families whose homes and livelihoods depend on this land, have carefully considered the personal tradeoffs.</p> <p>The proposed site of the reservoir includes valuable agricultural and recreational land, as well as favorite fishing grounds and the wedding locations of our daughters and granddaughters. We have been engaged throughout this process with the UYWCD regarding the specifics of the construction and operation of the reservoir. One primary concern discussed has been minimizing the draw down in order to minimize mudflats in the shallow areas.</p> <p>We have also agreed upon non-motorized recreational use, minimal traffic impacts, and private shoreline.</p> <p>Upon weighing the costs and benefits of the project as it relates to the land to which we are all deeply devoted, we have worked to also keep at the forefront what is best for the Yampa Valley community and state of Colorado.</p> <p>We support the Morrison Creek Reservoir project – but only with the inclusion of the aforementioned matters that relate directly to our continued quality of life on the land we have fought to preserve and the natural resources we have worked to conserve.</p>			kari.deq.harden@gmail.com lou@dequine.com

**Yampa-White-Green BIP
Response to Public Comments Matrix**

Committer Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
Richard Saterdal		7/21/2014	<p>We at the Morrison Divide Ranch subdivision, along with our neighbors, have been following the proposed Morrison Creek Reservoir with great interest since we first heard about this project in 2007. There is quite a bit of information available regarding this reservoir including information that is pertinent to the Yampa-White-Green Basin Implementation Plan (YWG BIP).</p> <p>The proposed Morrison Creek Reservoir is given prominence in the draft YWG BIP by being one of only five projects and processes called out by name in the executive summary. This reservoir is described in Chapter 4 where its purpose, capacity, storage right, cost and challenges are addressed in Table 4-4 of the draft YWG BIP. But much of this information has not been filled in yet in this table. For instance, Table 4-4 does not include a cost estimate for this project. However, Resource Engineering prepared a reservoir feasibility study report for the Upper Yampa Water Conservancy District (UYWCD) in 2009 that estimated the cost of this project to be \$20,300,000.</p> <p>Many of the challenges to making this reservoir a viable project and to getting the necessary permits and approvals are also known and should be included in Table 4-4. Construction of the proposed Morrison Creek Reservoir will destroy wetlands and encroach into the Sarvis Creek Wilderness area, requiring a challenging permitting and approval process. This reservoir will also destroy prime agricultural hay and meadowlands, as shown below, as well as inundate areas designated by the Colorado Division of Wildlife as severe winter elk habitat.</p>			cleanwater@pcisvs.com
			<p>The proposed Morrison Creek Reservoir will also disrupt and deplete the natural flow of the outstanding trout stream below the Morrison Creek dam, especially since the UYWCD wants to transfer via pipeline the water stored in this reservoir out of the Morrison Creek basin and into Stagecoach Reservoir.</p> <p>The water rights that the UYWCD has for Morrison Creek water are very junior water rights, and for this reason there is a substantial risk that the UYWCD will be unable to store water in Morrison Creek Reservoir in dry years or periods of high demand. There is also community opposition, technical and cost challenges that the project must overcome. The benefits of this reservoir must outweigh the drawbacks in order for it to be a viable project. These issues should be listed in Table 4-4 to convey some of the challenges that the proposed reservoir project must overcome.</p>			
			<p>Chapter 2 of the draft YWG BIP discusses environmental needs, including instream flows. It is my understanding that the Colorado Water Conservation Board (CWCBC) has in recent years obtained decreed instream flow water rights for Morrison Creek downstream of the proposed Morrison Creek Reservoir for the protection of aquatic life, but that these rights are junior even to the UYWCD's water rights. This reservoir will therefore not be required to be operated in a way that maintains minimum flows in the creek. The CWCBC has discussed instream flows below the reservoir with the UYWCD and should be able to provide an accurate assessment of the potential impacts of the reservoir on instream flows for the YWG BIP.</p>			

**Yampa-White-Green BIP
Response to Public Comments Matrix**

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			<p>Table 2 14, Attributes of Major Stream and Lake Segments, does not include Morrison Creek. However the UYWCD has done a study that identified wetland plant communities at the proposed Morrison Creek Reservoir site that will require a U.S. Army Corps of Engineers 404 permit before the reservoir can be built. The section of Morrison Creek below the proposed reservoir site is also an excellent trout stream.</p>			
			<p>Table 2 15, Annual Instream Flow Target and Baseline Modeled Flows, does not list instream flow targets and baseline flows for Morrison Creek below the proposed reservoir, nor is this stream segment listed in Table 2 16, Monthly Instream Flow Targets and Percentage of Modeled Years that Reached the Target. Morrison Creek instream flow modeling results are also not included in Section 3.4.2, Environmental and Recreational Shortages. These things should all be provided for Morrison Creek in the YWG BIP in order to help evaluate the potential impacts of Morrison Creek Reservoir.</p>			
			<p>Figure 2-10 indicates that Morrison Creek below the proposed reservoir was not modeled. For this reason, when instream flows are discussed in Section 3.4.2, there are no impacts shown or discussed for Morrison Creek below the reservoir for any of the modeling scenarios. Since this reservoir will have enormous impacts on the instream flows below it, that section of Morrison Creek should be modeled and included in the YWG BIP. For the time being, in the absence of modeling results, the CWCB assessment of reservoir impacts should be summarized in the YWG BIP so that readers of the report do not get the mistaken impression that the reservoir will not have any impacts on instream flows.</p>			
			<p>Chapter 3 discusses current and future water shortage analyses, including the Dry Future Identified Project and Process Scenario (IPP) which includes projects such as the proposed Morrison Creek Reservoir, and the Dry Future Scenario, which does not include projects such as the Morrison Creek Reservoir. The conclusion that many of the readers of the YWG BIP may come to is that each of the identified projects and processes modeled contribute to some of the benefits gained by implementing all of these identified projects and processes. But this is not necessarily true. Since the water rights that the UYWCD has for Morrison Creek water are very junior water rights, the UYWCD may be unable to store water in Morrison Creek Reservoir in dry years or periods of high demand. So this reservoir may not be able to provide any benefits in these scenarios.</p>			
			<p>The YWG BIP results need to show what benefits each individual project and process provide in each scenario in order to determine whether or not an individual project or process is effective. The YWG BIP also needs to describe important operational assumptions for the projects, such as whether or not Morrison Creek Reservoir was modeled to protect instream flows. Operational assumptions could be briefly described in Table 4-4 or in Chapter 3 where the modeling scenarios are discussed. When the Colorado Water Plan is presented to the governor it needs to provide sufficient information to serve as a basis for determining which projects are effective and how they should be operated in order to achieve the desired mix of goals. Based on the information provided in the draft YWG BIP it is impossible to tell whether or not the proposed Morrison Creek Reservoir provides any benefits in the scenarios modeled.</p> <p>The addition of further relevant information for projects such as the proposed Morrison Creek Reservoir and discussion of what benefits each individual project and process provide in each scenario will add tremendous value to the YWG BIP.</p>			

**Yampa-White-Green BIP
Response to Public Comments Matrix**

Commenter Name	Organization	Date received	Comment	Response to Comments	Change in Plan? Y/N	e-mail address
Charlie Preston-Townsend	Friends of the Yampa	4/6/2015	Summary points: 1) The State of Colorado shall view the Yampa River as a significant and reliable source of water to meet Colorado River Compact obligations; 2) Colorado shall hold nonconsumptive needs as a priority and consider the significant conservation work that has been accomplished in the Yampa River Valley as an example for future water planning; 3) The Yampa Valley and Western Slope water users must be assured that, in the event of a compact call, negotiated equitable apportionment will be utilized to protect our many important junior water rights; 4) The Eastern Slope of Colorado must maximize water use efficiency through a variety of methods including, but not limited to conservation, reuse, fallowing, new and expanded Eastern Slope storage and wise land-use planning principles.			
Sue E. Masica	Regional Director, National Park Service	3/19/2015	Summary points: 1)NPS shares concerns regarding risk of shortage in the Colorado River basin; 2) supports western slope basins that minimum water conservation should be changed from low to medium to high; that water conservation and efficiency could positively affect the resources in the national park units; 3) encourages inventory for environmental and recreational purposes to protect values; 4) encourages more on the ground projects to improve water quality and the environment; 5) in addition to protecting minimum base flows through instream flows, consider the value of higher flows to protect environmental and recreational uses; 6) recognizes the risk of new supply projects to the Colorado River Basin, particularly new trans-mountain diversions; 7) wet-year filling strategy could have unintended consequences for aquatic and riverine systems that depend on high-flows; 8) need to be consistent in the application of metrics when comparing the economic value of consumptive and non-consumptive uses; 9) need to include "protection of instream natural resources including endangered fish and other natural resources" in the Colorado River Contingency Plan.			



watercomments <watercomments@gmail.com>

Future of CO Water

S.Foi <maxx05052003@yahoo.com>

Tue, Feb 18, 2014 at 3:36 PM

To: watercomments <watercomments@gmail.com>

OK, Jackie...you asked for it! Here comes some "way out" DOABLE suggestions I have been harboring for a very long time.....don't know if I'll live to see any of them implemented, but here goes:

- (1)Trickle IRRIGATION of parkland in & around Routt Cty, preferably near a river or existing reservoir. [create more parks in need of this kind of water usage]
- (2)Trickle or gravity fed SEWER systems to replace the ancient, decadent Vault System mandated in the county (& statewide)....needed in such infrastructure-poor places like SouthShore & Horseback Subs in Stagecoach.....both being near a reservoir or creek.
- (3)Creation of small RUNOFF RESERVOIRS in places not adjacent to reservoirs or streams in need of water & associated greywater sanitary systems for underdeveloped areas.
- (4)WETLAND creation.....mini-tributaries to rivers.....for migrating waterfowl and permanent wildlife residents.

Hope this is useful input.....appreciate your keeping me posted on your outcomes.

sf

[Quoted text hidden]



watercomments <watercomments@gmail.com>

Future of CO Water

S.Foi <maxx05052003@yahoo.com>

Fri, Feb 14, 2014 at 7:00 PM

To: "watercomments@gmail.com" <watercomments@gmail.com>

As the saying goes, "use it, or lose it."

We need to find captive uses for our finite aqua resources locally up here, or lose it to the thirsty masses down there. Simple as that...now or 50 years from now, and beyond.

S.Foi
Stagecoach



How to save water

Allen Hischke <als362@hotmail.com>

Thu, Feb 20, 2014 at 8:41 AM

To: Allen Hischke <als362@hotmail.com>, watercomments@gmail.com

Hello:

I attended the Water Planning meeting that was held in Craig Colorado on February 19, 2014. I wanted to take the time to write the comments I made that night on these pages.

I believe that the best way to assure that we in Moffat County will have a good supply of water for the future is to conserve every drop that we can conserve. To do this I believe the correct thing to do would be to tell The Useless Fish And Wildlife Service (USFWS) to get out of the Yampa Valley forever, and take their unneeded, unnecessary, unwanted Squawfish with them. Then when they are gone build Juniper Cross Mountain Reservoir.

I say this because the USFWS wastes millions of gallons of our precious water allowing it to go down the Yampa River for these worthless sucker fish. If the people that live here in the Yampa Valley could save the water they waste our water woes would be greatly reduced. And If we had the Juniper Cross Mountain Reservoir, our woes would likely be eliminated.

**Here is a letter I wrote to many of our elected officials. So far I have not received a response from any of them. That shows how much these politicians care about us. Please read my letter and feel free to share it with anyone you wish to. Thank You
Allen Hischke
als362@hotmail.com**

Hello :

Today I am writing you about a subject that has needed attention for many years. The U.S. Fish and Wildlife Service (USFWS), has for years, been killing the game fish in the Yampa River. They are doing this in an effort to save the Colorado Pike Minnow (Squawfish), Humpback Chub, Bonytail and Razorback Sucker that are on the endangered species list. They shock the Yampa River to remove the non-native species, notably Smallmouth Bass, and Northern Pike, from the river.

For years they took these removed fish, and moved them to other impoundments. The Pike went in some small ponds near Hayden, CO., and they put the Smallmouth in Elkhead Reservoir. When these fish were moved they were tagged to identify them as fish removed from the river. This improved the fishing in these places.

Elkhead Reservoir, is the lake that recently had its level raised, and a taller dam with new spill structures and gates installed. When these gates were installed they were screened to

What I would like you to do is propose an amendment or to the Endangered Species Act. This amendment would require the people altering an area in an attempt to save another species to have a vote of the people in that area, every 5 years, to see if these people want this activity to continue. If the vote states that the altering activity must be stopped, then that will be the order to those doing these things. In this area, they would be required to stop killing the non-native fish in the Yampa River and Elkhead Reservoir. They could continue any other restorative efforts to help save these species.

For this area, the vote should be broken into several segments. The people in Steamboat Springs would vote on the area of the Yampa River upstream from Steamboat Spring then half way to Hayden Colorado. The people in Hayden and Craig, would vote on the area of the Yampa River halfway to Steamboat Springs then to Sunbeam CO. or the boundary of the Dinosaur National Monument.

Altering the Endangered Species Act in this manner would still allow the recovery efforts of the species in question, while also protecting the species that the local residents want to keep. It would save fuel, oil, promote tourism in many areas, add to the tax base of many communities, and give the children in these areas another form of summer recreation here, helping to keep them from getting into trouble. You know the old saying, "Get your kids hooked on fishing and they won't get hooked on drugs or alcohol". This is a very true statement.

I beg you to discuss this type of alteration to the Endangered Species Act. It will be a boon to many areas of the United States in many ways. I look forward to hearing about this new legislation on the news in the future.

If you are looking for a way to cut the federal budget, this is a very good place to start.

Thank you for taking the time to read this letter, this issue is important to the people that live here.

Allen J. Hischke P.O. Box 710 Craig, Colorado 81626 970-824-7921 als362@hotmail.com

cc: Obama, Bennett, Udall, Tipton, White, Baumgardner, Hickenlooper

February 24, 2014.

TO: Committee Members Colorado Water Plan

FROM: Robert L. Tobin, Retired USGS Hydrologist 

PO Box 1065, Meeker, CO. 81641-1065

(970) 878-4205

RE: Water Quality in the Basin Implementation Plan

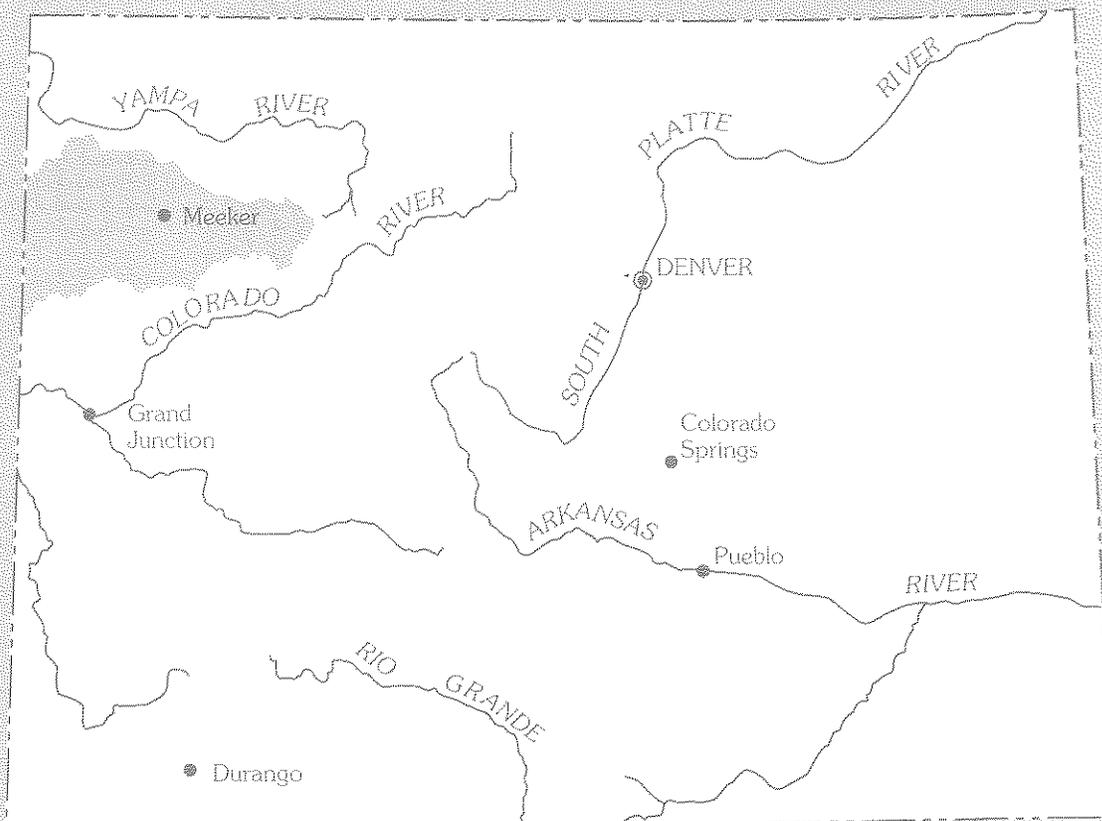
The scope of the Basin Implementation Plan for the Yampa and White River basins, as presented in the handouts at the recent Craig meeting, does not address water quality issues.

Plans for effective and optimal water management for the beneficial uses by residents within a river basin should include water quality and quantity information. The nature of dissolved and suspended constituents that define the water quality of surface and tributary ground water sources, and the variations that occur with changes in flow and seasonal activities, are very important factors for the proper management of both sources. The implementation and /or incorporation of water quality information was not included in the above mentioned handouts.

Enclosed for your information and potential use is a summary report of water quality characteristics and variations for a 15 year period for the White River. The period includes years of record high and low flows in the basin.

SEDIMENT TRANSPORT AND WATER-QUALITY CHARACTERISTICS AND LOADS, WHITE RIVER, NORTHWESTERN COLORADO, WATER YEARS 1975-88

U.S. GEOLOGICAL SURVEY



Water-Resources Investigations Report 92-4031

Prepared in cooperation with the
YELLOW-JACKET WATER CONSERVANCY DISTRICT,
WATER USERS ASSOCIATION NO. 1,
RIO BLANCO COUNTY, and the
COLORADO RIVER WATER CONSERVATION DISTRICT



Cover Sheet for Input Document, Item #10

The document listed below was submitted as formal input for Colorado's Water Plan. A summary of the document, including a staff response and/or recommendation is included in the master spreadsheet included within this packet.

Date: March 12, 2014

Input provided by: Anthony D'Aquila

Method of submission: Online General Input Webform at www.coloradowaterplan.com

Summary of Input: Comments regarding the Yampa/White/Green Basin Implementation Plan.

Documents Submitted for Review: Comments in attached letter

Staff Response: CWCB Staff will forward the attached letter to the Yampa/White Green Basin Roundtable for review.

Comments to the Yampa/White/Green River Basins Roundtable

I wish to provide the following initial comments to the Basin Implementation Planning process. You have a tremendous responsibility, as in my perspective, this undertaking is perhaps the most crucial public planning effort Colorado will face in this century.

To bring the key points of my comments up front, I propose the following three goals.

GOAL #1: No new inter-basin transfers or withdrawals from the Yampa/White/Green River Basin unless all reasonable alternatives have been fully implemented, to include water conservation programs, demand management programs, tiered water pricing policies, and reclaim/re-use programs.

GOAL #2: The Colorado Legislature to establish and approve mandatory daily water consumption goals for every public and otherwise regulated water utility in the state to strive to achieve. Recommended goal is 120 gallons per person per day or less.

GOAL #3: That Colorado's state and federal legislators will represent these goals in their negotiations with our neighboring states, the federal government, and the various regional and national planning and water regulatory commissions and agencies. State and federal legislators should object to additional out-of-state water supply commitments from Colorado unless receiving entities have likewise adopted more stringent water conservation and demand reduction measures.

GOAL #4: Water policy and planning in our Yampa-White-Green Basin and preferably state-wide must be integrated and holistic, considering the full spectrum of impacts and benefits to ecosystems, communities, and businesses.

Background

For too long water policy focused on the supply-side of the argument. Demand-side programs need to be the primary mechanism in resolving our water shortages and developing long term solutions.

Colorado is the leader in the Mountain West in many areas of innovation and technology. We must be the leaders in terms of water policy and water conservation as well.

All aspects of water conservation should be investigated and applied vigorously where appropriate. All water users must be party to water conservation efforts. This includes the agricultural sector, ranchers and farmers. Antiquated methods of irrigation, such as open-ditch transport of water or broadcast spraying, must be phased out and replaced with best management practices (BMP's) such as drip irrigation and moisture content-controlled application, that conserve water, utilize reclaimed water, and minimize loss and waste.

Goal 1 is meant to convey a serious message concerning short-sighted water policy planning. Increasing supply before implementing alternative solutions to reduce demand is a short-sighted policy decision. Moving water from a remote basin to provide increased supply in another region is not only wasteful of resources, it is contrary to good policy or planning. Aiming to increase supply without addressing demand management is treating the symptom and not the cause. The streamflow that exist in a system

such as the Yampa River is not a “surplus” resource, it is an intrinsic component of that particular ecosystem and plays a role in all receiving downstream communities. Withdrawal and removal from those systems will be detrimental and cause economic and ecological harm. It would be detrimental to our community, to our ranchers and farmers, and to our businesses dependent upon a robust summer and winter outdoor recreation industry. Further, any use of such a mechanism as a future withdrawal and inter-basin transport should be as a last recourse, after all alternative mechanisms available to the proposed receiving basin have been fully implemented, and then only if a requirement still exists.

Key to achieving reduced potable water demand is to implement policies and programs to encourage demand reduction. That is the purpose behind Goal 2. As reported within the SWSI, the per capita daily consumption throughout the whole of Colorado exceeds 200 gallons per day. That is far out of line with the water consumption standard many, many other communities across the nation have already achieved. For a state hovering on the brink of water supply disaster, it is critical to reduce our per capita demand. We can do better, and need to implement programs to drive that demand for water down to the 120 gallon per capita per day average. Tiered water pricing strategies and programs to encourage water savings, such as rebates for low flow toilets and water saving appliances, must be considered. Likewise, planners need to recognize we live in an arid environment. Xeriscaping and severe limitations on lawn irrigation must be implemented. Our metropolitan areas and urbanized areas serviced by advanced wastewater treatment systems must implement reclaimed and recycled water programs and begin to distribute reclaimed water to industrial users and for residential lawn irrigation. Those initiatives need to be supported by the state legislature and provided funding as necessary.

If we as Coloradans are successful in implementing these water conservation and demand management programs, then our state and federal legislators will have more standing to defend Goal 3, holding the line on more withdrawals from our state to other regions.

Implementing good water policy and programs need not require us to choose between agriculture and urban users, or to short change the environment. If we use integrated management and careful analysis of benefits and impacts, we can achieve balance. We do not need to choose between the lesser of two evils, if we plan better and seek mutually compatible and supportive results. For example, a surface water impoundment can exist as a system of ponds and wetlands beneficial to wildlife and outdoor recreation use.

Thank you for the opportunity to express these opinions.

Sincerely,

Anthony J. D’Aquila
2315 Ski Trail Lane, #21
Steamboat Springs, CO 80478
adaquila@tampabay.rr.com

mailing address:
P.O. Box 771239
Steamboat Springs, CO 80477-1239

Cover Sheet for Input Document, Item #12

The document listed below was submitted as formal input for Colorado's Water Plan. A summary of the document, including a staff response and/or recommendation is included in the master spreadsheet included within this packet.

Date: March 14, 2014

Input provided by: Ben Beall, Yampa River System Legacy Partnership/America's Great Outdoors

Method of submission: Email to cowaterplan@state.co.us

Summary of Input: Text from email: "I have attached a letter that the Yampa River System Legacy Partnership/ America's Great Outdoors as requested by Jay Gallagher which the Legacy Partnership sent to Jacob Bornstein, Program Manager, CWCB. Last Wednesday, March 12, 2014 the Legacy Partnership submitted a similar letter concerning the CWP to the Yampa/White/Green Roundtable. Thanks for your consideration of the Legacy Partnership Principles in regards to the Yampa River for the CWP."

Documents Submitted for Review: Comments in attached letter

Staff Response: CWCB Staff will forward the attached letter to the Yampa/White Green Basin Roundtable for review.

YAMPA RIVER SYSTEM LEGACY PARTNERSHIP AMERICA'S GREAT OUTDOORS
Continuing the Legacy of the Yampa River

March 6, 2014

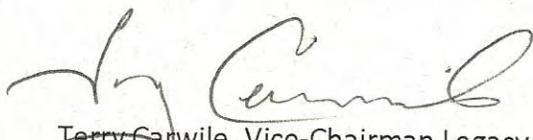
Jacob Bornstein, Program Manager
Colorado Water Conservation Board
1580 Logan St., Suite 200
Denver, CO 80203

Mr. Bornstein,

Please find attached comments from the Yampa River System Legacy Partnership to the Yampa/White/Green Basin Roundtable regarding the Basin Implementation Plan and the Colorado Water Plan.

Thank you.

For the Yampa River System Legacy Partnership – America's Great Outdoors



Terry Carwile, Vice-Chairman Legacy Partnership and Mayor, City of Craig on behalf of
Ben Beall, Chairman Legacy Partnership and Alternate for Routt County

cc: Yampa/White/Green Basin Roundtable

cc: Governor Hickenlooper

YAMPA RIVER SYSTEM LEGACY PARTNERSHIP AMERICA'S GREAT OUTDOORS

Continuing the Legacy of the Yampa River

Comments to the Yampa/White/Green Basin Roundtable Regarding Basin Implementation Plan and Colorado Water Plan

The Yampa River System Legacy Partnership – America's Great Outdoors (Legacy Partnership), formed in 1995, is one of the longest established, if not *the* longest, community-based, conservation-oriented organization composed of local, state and federal partners representing both the Upper and Lower Yampa River Basins. The Legacy Partnership operates under a Memorandum of Understanding, which was revised and expanded in 2011 to include goals of the America's Great Outdoors Initiative. The eighteen Partner representatives (along with alternates) from both Routt and Moffat Counties include; county and municipal elected officials; state and federal representatives; conservation, agricultural, business and recreation community members; youth and outdoor job and outdoor education proponents; and public lands and Yampa River advocates. These Partners bring to the Legacy Partnership diversity in experience from both Routt and Moffat Counties that serve the entire Yampa River Basin.

The revised 2011 Legacy Partnership Mission states: *"The Yampa River System Legacy Partnership is a voluntary collaborative, incentive-based project designed to protect and enhance the health of the Yampa River and its tributaries; adjacent agricultural lands and ecosystems; and the wildlife supported by these lands and waters. The YRSLP advances this mission through land conservation activities while providing recreational opportunities compatible with the natural environment of the Yampa Valley. This Legacy mission is closely aligned to and consistent with the recently announced America's Great Outdoors Initiative and is herein updated and revised to address AGO's expanded focus on connecting youth to the natural environment through jobs, environmental education and outdoor experiences along with AGO's focus on river restoration."*

The Yampa River and its surrounding lands are at the core of Legacy's mission and the rationale in submitting the following comments and principles to the Yampa/White/Green Roundtable, the Colorado Water Conservation Board (CWCB), and other interested stakeholders. The Basin Implementation Plan and the Colorado Water Plan (CWP) must take into consideration current and future water needs, both consumptive and non-consumptive, of the Yampa River Basin.

The Yampa River Legacy Partnership's two-decade long commitment has been focused on the importance of the Yampa River, its water and flows, in both the Upper and Lower Yampa River Basins. Legacy's successful program includes projects related to protection of the environment and important wildlife habitat; appropriate river recreation uses; and conservation of the valley's agricultural lands. Thousands of acres of agricultural lands have been conserved

through the Legacy program and over a hundred-thousand acres conserved in the region that complement Legacy's work.

A Non-Consumptive Needs Assessment was completed by the Yampa/White/Green Basin Roundtable. This Assessment identifies and maps key environmental and recreational attributes and activities that are directly tied to the Yampa River and its flows (CWCB 2011 and 2012). The report highlights the importance of protecting the flows of the Yampa River that are critical to sustaining the environmental health of the Yampa River along with those needed to support the river-related outdoor recreational economies of the region. The implications of the study lead to the understanding of the far-reaching significance that the Yampa River has to the region, more than are captured by the report. The Yampa River serves as the foundation for an ever-expanding economy developed around outdoor recreational activities, industries and travel related businesses – all defined as “non-consumptive uses” that depend on the lifeblood of water that the Yampa River provides.

The Legacy Partnership, a local, community-based collaboration, has demonstrated success in addressing projects along the entire reach of the Yampa River. The Partners strongly believe the following principles are important to planning for future water needs in the Yampa River Basin for the citizens of Colorado, those that live in the Yampa Basin and to future generations of Colorado residents. The principles outlined herein address two of the three requirements as mandated in Gov. Hickenlooper's Executive Order for the CWP (D2013-005). The Colorado Water Plan must incorporate: (1) “a viable productive economy including a productive agriculture . . . recreation and tourism industries”; and (2) “a strong environment that includes healthy watersheds, rivers, streams, and wildlife.” These requirements align with Legacy's mission and mission success for the Legacy Partnership is dependent on these requirements being met.

Principles for Future Water Needs Planning in the Yampa Basin

General Principles:

1. Protect the flows in the Yampa River and its tributaries, all of which support agriculture and the outdoor and water-based recreation economies of communities found throughout the Yampa River Basin. (Requirement One of Gov. Hickenlooper's Executive Order for the CWP.)
2. Protect the flows of the Yampa River and its tributaries in order to protect the natural resources and ecology of Northwest Colorado for future generations. (Requirement Three of Gov. Hickenlooper's Executive Order for the CWP.)
3. Protect current and future flows of the Yampa River in light of the potential effects of Compact Calls or climate change.

Specific Principles:

1. Protect agricultural water in order to preserve agricultural lands.
 - Encourage preservation of irrigated agricultural lands through voluntary, incentive-based programs such as conservation easements and alternative agricultural water transfer methods (interruptible supply agreements).
2. Protect the flows of the Yampa River to preserve the native riparian habitat that supports native (and non-invasive, non-native) fish and native birds and native wildlife.
 - This includes protection of the globally rare riparian habitat found along certain reaches of the Yampa.
3. Protect the flows of the Yampa River in order to ensure the survival of the four endangered fish.
 - Support the goals of the Endangered Fish Recovery Program and the agreement captured in the Yampa River Programmatic Biological Opinion (1999-2000).
4. Protect the flows of the Yampa River to ensure both existing and future recreational opportunities will be viable throughout the entire reach of the Yampa River, including opportunities for boaters, hunters, anglers and wildlife watchers.
 - The rapidly expanding outdoor recreation industry based around the Yampa River (recreation, retail, manufacturing and travel-related businesses) is a significant component of the Northwest Colorado economy.

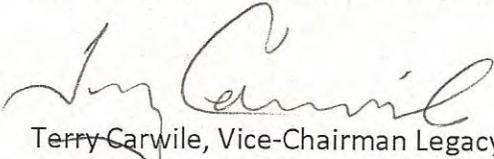
The Future of the Yampa River

The Legacy Partnership understands the importance of water for the Yampa Basin and its residents, economy and visitors. The future of our basin is in jeopardy if we, the citizens and members of the Yampa/White/Green Roundtable, do not accurately evaluate and plan for *all* our future water needs – both consumptive and non-consumptive. If this opportunity to plan appropriately into the future is missed, the Legacy Partnership's accomplishments will be at risk. We also risk the opportunity to secure significant financial resources from local, state and federal partners that have invested in the past and are poised to make additional investments to protect the future of the Yampa Basin, its lands and wildlife.

We are confident the Yampa/White/Green Roundtable will understand the importance of the Yampa River as the only relatively free-flowing river system in Colorado and understand why the Legacy Partnership shares its history, mission and accomplishments in support of the Yampa River. Please let our mission and accomplishments guide your deliberations to ensure that both consumptive and non-consumptive water uses on the Yampa River are protected within the Colorado Water Plan. The Legacy Partnership is proud of our accomplishments and we will continue to advance our mission, to which the Yampa River is critical. The Yampa River

is our legacy and is the foundation upon which the future of the entire Yampa River Valley is based.

For the Yampa River System Legacy Partnership – America’s Great Outdoors



Terry Carwile, Vice-Chairman Legacy Partnership and Mayor, City of Craig on behalf of Ben Beall, Chairman Legacy Partnership and Alternate for Routt County

YAMPA RIVER SYSTEM LEGACY PARTNERSHIP – AMERICA GREAT OUTDOORS PARTNERS:

VOTING PARTNERS:

Routt County
Moffat County
City of Steamboat Springs
City of Craig
Town of Hayden
Bureau of Land Management
Colorado Parks and Wildlife (Wildlife Representative)
Colorado Parks and Wildlife (Parks Representative)
Yampa Valley Land Trust
The Nature Conservancy
Agricultural Representative Routt County
Agricultural Representative Moffat County
Recreation Representative
Business Representative
Youth and Outdoor/Environmental Education Representative
Youth and Outdoor Environmental Jobs Representative
Public Lands Representative
Yampa River Representative

NON-VOTING PARTNERS:

US Forest Service
Dinosaur National Monument
US Fish and Wildlife Service
US Geological Service
US Bureau of Reclamation
Colorado Department of Natural Resources
Northwest Colorado Watershed Partnership
Veterans Green Jobs
Routt County Conservation District

Cover Sheet for Input Document, Item #48

The document listed below was submitted as formal input for Colorado's Water Plan. A summary of the document, including a staff response and/or recommendation is included in the master spreadsheet included within this packet.

Date: April 10, 2014

Input provided by: Kevin McBride, Upper Yampa Water Conservancy District

Method of submission: Online General Input Webform at www.coloradowaterplan.com

Summary of Input: Letter to the Yampa/White/Green Basin Roundtable (YWGBRT) regarding their support for the YWGBRT's White Paper.

Documents Submitted for Review: Comments in attached letter

Staff Response: The CWCB will send the Upper Yampa Water Conservancy District's letter to the YWGBRT. These comments also helped inform the IBCC discussion during the April 29, 2014 IBCC meeting.



Upper Yampa Water
Conservancy District

April 15, 2014

Mr. Jon Hill,
Chairman, Yampa/White/Green Basin Roundtable
Via email

RE: Yampa/White/Green Basin Roundtable, White Paper

Dear Chairman Hill

The Upper Yampa Water Conservancy District (UYWCD) Board has reviewed and approves of the Yampa White Green Basin Roundtable's (YWGRT) White Paper. The UYWCD Board wants to stress that it agrees with the need for an equitable apportionment for use of local waters. With regards to any additional Trans-Mountain Diversion (TMD) of water from the Colorado River Basin, given concerns about the Colorado River Compact and operational difficulties at Lake Mead and Powell, we are opposed to such diversions.

Before additional TMD's should be considered, some amount of the water resources of local rivers must be available first to those who live here; and that must be agreed upon prior to any additional TMD from the Colorado Basin at any location. The operation of any proposed Trans Mountain Diversion and its impacts on our Basin must be thoroughly understood prior to any agreement. Finally, the construction of such a project must be funded by the beneficiaries of the project and not by State taxpayers.

As the State of Colorado seeks to create a Colorado Water Plan it should not lose sight of the geographic diversity within the State, the variability of water supplies through time, and of particular interest to the Upper Yampa Water Conservancy District, the unique situation in the Yampa River Basin. As the UYWCD seeks to fulfill its mission:

"To lead water resource management within the District's boundaries by responsibly conserving, protecting, developing, providing and enhancing the water resources of the Yampa River Basin. The District will initiate and participate in projects that embody and promote the protection of water rights, provide broad benefits to District constituents and develop projects that provide responsible conservation, responsible growth, beneficial water storage and usage, and public awareness within the Upper Yampa Water Conservancy District".

We appreciate that the State seeks a Basin Implementation Plan that is truly a "bottom up" process, so that local entities can truly lead the process.

Sincerely,

John V. Redmond
President, Upper Yampa Water Conservancy District

Cover Sheet for Input Document, #74

The document listed below was submitted as formal input for Colorado's Water Plan. A summary of the document, including a staff response and/or recommendation is included in the master spreadsheet included within this packet.

Date: May 2, 2014

Input provided by: Stephanie Scott, Colorado Trout Unlimited

Method of submission: Email to Kate McIntire, forwarded to cowaterplan@state.co.us

Summary of Input: Text from email: "Thank you for the opportunity to submit materials to the CWCB Board and also for the time to speak to them at the board meeting. Attached are the final packets that Trout Unlimited has prepared that are specific to each basin. These packets are our suggested content for the basin implementation plans. While we intended on developing comments for all 9 basin we realized that it was best to focus on just the ones attached. We have combined the South Platte and Metro comments into one packet. For the basins that do not have comments we are still pushing our TU Water Plan Principles to be incorporated into the BIP and our members will be involved at the meetings. Those principles are attached to this email in a separate document. After speaking with roundtable representatives it was suggested that we included both broad level and specific detailed comments. Per this request we have gathered and organized the packets into 3 sections to make it easier for the roundtables to incorporate the comments.

- The first section includes broad principles that Trout Unlimited would like to see incorporated into all of the BIPs throughout CO.
- The second includes bullet point comments that are specific to each of the basins.
- The third section lays out each of those bullet points in more detail.

I will be the one speaking at the CWCB Board meeting. I will be presenting these packets to the board and explain the outreach that Trout Unlimited has done on the water plan, emphasize the opportunity for the CWCB Board and Trout Unlimited to work together and give a brief overview of our high level principles. Please let me know if there is anything else that you need."

Documents Submitted for Review: Comments in attached letters

Staff Response: Staff appreciates the considerable work Trout Unlimited (TU) put into the comments provided and will pass each of the basin-specific documents to the respective BRTs. With regard to TU's Water Plan Principles, "meaningful efforts to protect and restore healthy rivers and streams" will be incorporated into Section 5.9 and the BIPs. The CWCB expects that the BIPs will help refine the municipal supply gap and Colorado's Water Plan will emphasize efficient use of Colorado's Water supplies in Section 5.6. The initial draft of Chapter 5.6, released in May for public review, explores conservation and reuse. Colorado's Water Plan suggests that at a minimum and in the near term, Colorado should seek to implement "medium" conservation practices while acknowledging that in the future "high" levels of conservation may be needed depending on which scenario presents itself in Colorado. Section 5.7 is also now available for public review on Alternative Transfer Methods and the BIPs will explore the integration of water supply systems. Overall, TU's Water Plan Principles are consistent with the values expressed in Colorado's Water Plan and the plan will encourage multi-purpose projects. With regard to new transmountain diversion projects, the IBCC is exploring innovative ways to address this issue in a balanced manner. Lastly, CWCB will consider the laws and policies suggested by TU to facilitate creative water management when drafting Section 5.11.

Trout Unlimited's Comments for Colorado's Water Plan

Trout Unlimited's Statewide Colorado Water Plan Principles

Colorado Trout Unlimited's board of directors, which includes representation for 24 local chapters statewide, supported the following core principles as measures that should be reflected in the Colorado Water Plan.

- 1. The Colorado Water Plan must include meaningful efforts to protect and restore healthy rivers and streams and environmental and recreation uses of water.** Just as it is important to address consumptive water supply "gaps", the State must also document and address its environmental and recreational supply gap. Healthy rivers are vital to communities, promote property values, support a strong recreation economy, and contribute to the quality of life that makes Colorado a great place to live. Beyond identifying focus reaches with key values for protection and restoration, the Colorado Water Plan should lay out specific actions to assess and quantify environmental and recreational needs in each basin, timelines for implementation of both the needs assessments and projects to provide for those needs, and resources to complete them. By way of illustration, projects could include restoration of river and wetland habitat, appropriation and acquisition of instream flows to protect, enhance and restore the environment, management of new and existing water supply projects to enhance flows, and collaborations with irrigators to increase efficiency and keep more water in-stream. Colorado's Water Plan should ensure that our State continues to enjoy the many ecological, social, and economic benefits of healthy rivers.
- 2. Basin implementation plans need to help refine the municipal supply "gap" at a local level.** Planning to meet future water demands depends on understanding what the needs are at a local level, so that strategies can be designed to provide water when and where it is actually needed.
- 3. Filling the municipal water supply gap requires a balanced strategy emphasizing efficient use of Colorado's limited water supplies.**
 - a. High water conservation targets should be reflected in basin implementation plans.** Water efficiency is the cheapest, fastest, and least environmentally-damaging way to meet growing municipal water needs in communities across Colorado. As technology improves, and with use of incentives to further promote xeric landscaping, water conservation can go a long way in helping fill Colorado's future water supply gap. State policies should promote such conservation efforts throughout Colorado. Our water



resources are limited, and maximizing the efficiency with which they are used must be a cornerstone of statewide water policy.

- b. Water re-use should be an increasing part of meeting future water needs.** Where water can legally be reused to extinction (transbasin water, already converted consumptive use water, non-tributary groundwater), it should be. This is part of maximizing the use of existing (or new) water supplies to meet demands. Necessary infrastructure for treatment and delivery of re-use water should be incentivized with state funding.
- c. Alternative transfer mechanisms and improved agricultural efficiency should be used to meet growing needs while maintaining agriculture and protecting Colorado's environment** Irrigated agriculture provides far-reaching benefits to the economy, environment and quality of life in Colorado. The state should support water sharing arrangements – from water banks to rotational fallowing – that can help meet municipal supply needs and maintain healthy rivers while avoiding the social, economic and environmental impacts associated with traditional “buy and dry” transfers. The focus should be on temporary transfers, not permanent fallowing of irrigated ground. State support could include funding support as well as legal and policy changes to reduce the burdens and risks associated with such nontraditional water sharing agreements. The state should also support infrastructure improvements to benefit agricultural operations, healthy flows, recreation, and local communities.
- d. Better integration of water supply systems can help increase efficient use of Colorado's water.** Collaborative efforts among water suppliers can help use strengths in one supply system to bolster weaknesses in another, and vice versa – which will help increase the overall efficiency and reliability with which water can be provided for present and future demands. Partnerships such as those envisioned with the WISE project between Denver Water and south-metro-area suppliers can help responsibly meet water needs more efficiently and effectively than a “go-it-alone” approach.
- e. Structural projects to bolster water supply should avoid harmful effects to rivers and local communities.** Where structural projects are needed to firm water supplies, provide storage for managing water yielded from other strategies like reuse, and otherwise assist in meeting future needs, they should be designed to avoid adverse impacts to environmental and community values. Given the importance of healthy rivers to Colorado's economy and quality of life, it is critical that future projects protect, and where possible enhance, non-consumptive water values. Projects that can provide multiple benefits should be encouraged. Partnerships – such as those under the Colorado River Cooperative Agreement and associated agreements – can be a key part of managing water supplies to provide those multiple benefits.
- f. A new large trans-basin diversion from the Colorado River is not the answer for meeting Front Range needs.** Local, focused projects (such as conservation, re-use, temporary agricultural transfers, and small-scale storage) can be tailored to address community-specific “gaps” in future supply in ways that large, costly transbasin



diversions cannot. Such diversions also create risks of over-development of Colorado's compact entitlements, cause significant environmental impacts, and threaten West Slope agriculture and communities. These projects generate great controversy and conflict, and can result in lengthy, costly permitting processes with uncertain outcomes. Colorado will be better served by the other water supply strategies described above.

4. Laws and policies to facilitate creative water management should be encouraged.

Current law and policy may be an obstacle to many of the water supply strategies discussed above. Transaction costs and risks to existing water rights can be major roadblocks to creative solutions to better meet Colorado's water needs. Colorado should adopt legislation and policy to help encourage rather than discourage creative arrangements for efficient water supply and water sharing. Current legislative efforts to encourage agricultural efficiency and protect instream values (SB 23) or to allow flexible marketing of water generated through changes within agricultural operations (HB 1026) are examples of changes that can help promote creative solutions for better meeting Colorado's future water supply needs.



Agriculture in northwest Colorado is of vital importance, both locally and state wide. Agriculture has provided the economic and cultural engine that has shaped Northwest Colorado for the past 150 years. Much of the region's current diversity is built on the foundation that Agriculture continues to provide economically, socially, recreationally, and environmentally. Therefore, maintaining and expanding the future viability of Agriculture in Northwest Colorado should be a top priority in the Colorado Water Plan.

To that end Community Agricultural Alliance of Northwest Colorado endorses the following principles and values to be incorporated in the Colorado Water Plan ("CWP"). These principles are of equal worth and are not listed in any order of importance.

- Agricultural water rights in Northwest Colorado should be protected and enhanced by the CWP. Existing agricultural water rights, both pre-Colorado River Compact and post Compact water rights, must be protected.
- Agriculture in Northwest Colorado must be viewed equally with agriculture and industry throughout the state of Colorado. The agricultural interests in one part of the state should never be elevated over the agricultural interests in another part of the state.
- Agriculture water rights in Northwest Colorado provide a cornerstone of all other economies in the region; recreation, environment, retail, social, municipal, residential and industrial. Agriculture water must be protected and enhanced for the other sectors to succeed.
- Future agricultural needs in Northwest Colorado must be considered and planned for in the CWP.
- The principal of equal apportionment of water resources throughout the state must be a corner stone of the CWP to protect the Yampa, White and Green basin in Northwest Colorado from disproportionate impacts of a Colorado River Compact call.
- Any consideration of "New Supply" in the form of trans-mountain diversions from the West Slope to the East Slope should not threaten western slope water rights, including increasing the chances of a Colorado River Compact call.
- The CWP should promote water conservation in each basin to fully utilize the available water supply within each basin before any "new supply" trans-basin diversions are considered. Under no circumstances should agriculture be penalized for more efficient water use methods.
- The importance of non-consumptive benefits provided by flood irrigation should not be underestimated in the CWP. The historic use of agriculture water rights provides a river flow regime that helps maintain wetlands, recharge alluvial aquifers, provide late season flows to downstream users and augment minimal stream flows which help mitigate environmental concerns, including threatened and endangered species.



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- Water quality and quantity are inextricably linked. Therefore, water quality as well as quantity must be considered a fundamental goal of the CWP. The health of all stakeholders can only be served if the quality of the water continues to support healthy Agriculture and Ecosystems through which it flows.
- Future municipal and industrial water supply projects that incorporate agricultural and non-consumptive water supplies must be prioritized over single- or limited-use water supply projects.
- The stewardship that agriculture continues to provide to wildlife and riparian habitat through the use of Best Management Practices (BMP's) by maintaining open space through authentic working landscapes and conservation easements must be protected and enhanced in the CWP.

Thank you for the opportunity to provide input on the Basin Implementation Plan. The Board of Directors and Advisors for Community Agriculture Alliance are greatly appreciative of the time, effort and resources expended by each of the Yampa-White-Green Round Table members to assure the protection of water resources in Northwest Colorado.

Sincerely,

Marsha Daughenbaugh
Executive Director



To Whom It May Concern:

The Friends of the Yampa is a volunteer-run nonprofit based in Steamboat Springs, Colorado, dedicated to the protection and enhancement of the recreational and environmental integrity of the Yampa River and its tributaries through stewardship, advocacy, education and partnerships.

In response to the Colorado Water Plan, we have four primary expectations for future water planning: 1) The state of Colorado shall view the Yampa River as a significant and reliable supplier of water to meet Colorado River Compact obligations; 2) Colorado shall hold non-consumptive needs as a priority and consider the significant conservation work that has been accomplished in the Yampa River Valley as an example for future water planning; 3) The Yampa Valley and western slope water users must be assured that, in the event of a compact call, negotiated equitable apportionment principles will be utilized to protect our many important junior water rights; 4) Maximum efficiencies through reduction and reuse programs shall be fully implemented before any further trans-basin projects are undertaken in the Yampa River basin and across Colorado. In fulfilling these expectations, Colorado will benefit from a gem of American river antiquity in the Yampa River, featuring a living, flooding, changing and thriving natural system.

The state of Colorado shall view the Yampa River as a significant and reliable source of water to meet Colorado River Compact obligations.

Twelve of the last fifteen years have been drought years in the state of Colorado and the greater Colorado River basin. Weather projection models predict this trend to continue and worsen. Lake Powell, as Colorado's bank account to fulfill compact obligations, has struggled to maintain a sufficient water level to ensure downstream delivery obligations and electric power generation. The Yampa River, as an unimpeded and under developed river, stands as a steady contributor to fulfilling Colorado's Compact obligations.

Colorado shall hold nonconsumptive needs as a priority and consider the significant conservation work that has been accomplished in the Yampa River Valley as an example for future water planning

The state of Colorado stands to benefit from the unencumbered hydrograph of the Yampa River as it sustains our traditional economy, agricultural heritage, and recreational

activities for tourism and residents. Nonconsumptive uses such as rafting and kayaking, fishing and hunting along with tourism are activities that will continue to prove beneficial to the State of Colorado.

Protecting the Yampa River's flows will also benefit the four endangered fish species that count on the spring flooding, and the warm, sediment rich water present in the naturally flowing Yampa River.

The Yampa River Legacy Project, through land and river conservation efforts, has successfully conserved lands worth over \$70 million along the Yampa River Corridor. This collaboration was an effort to protect the integrity of the Yampa River's agricultural heritage and unique riparian and recreation values. These conservation measures were accomplished through a collaborative, inclusive effort by a diverse group of stakeholders throughout Northwest Colorado.

The Yampa Valley and Western Slope water users must be assured that, in the event of a compact call, negotiated equitable apportionment will be utilized to protect our many important junior water rights.

In the event of a Western Slope curtailment to meet compact obligations, strict adherence to prior appropriation would be harmful to many important junior water rights. By utilizing a negotiated equitable apportionment method in cases where it is beneficial to critical junior rights, the state of Colorado will be better prepared to deal with water shortages.

Finally, the Eastern Slope of Colorado must maximize water use efficiency through a variety of methods including, but not limited to conservation, reuse, fallowing, new and expanded Eastern Slope storage and wise land-use planning principles.

The Front Range of Colorado is generating the majority of new water demand and should use their existing water resources as though there is no additional water. Conservation efforts have made progress, significantly in some areas. Reuse projects are being designed and built. Cooperative efforts between water suppliers and agricultural water right holders should be emphasized, striving to share water between efficient agriculture and responsible water providers. Expanded and new Eastern Slope water storage projects need to be seriously revisited. Eastern Slope water providers must partner with their local governments and establish policies for land use approvals that ensure there is a sustainable water supply prior to approval of new growth. Projected long-term water shortages in the Colorado River basin, along with the anticipated growth of eastern Colorado make a strong argument for continued emphasis on these measures.

Any new trans-basin diversion on the Yampa River threatens the role of the Yampa River as a significant and reliable source of water to meet Colorado River Compact obligations, and threatens the recreational and environmental integrity of the Yampa River, and thus must be opposed.

The Friends of the Yampa are grateful for the opportunity to provide input and respectfully urge the Governor, the Colorado Water Conservation Board and the Yampa/White/Green Roundtable to take these points into consideration when preparing the Colorado Water Plan.

Kind regards,

Charlie Preston-Townsend
Vice President, Friends of the Yampa
Steamboat Springs, Colorado



United States Department of the Interior



NATIONAL PARK SERVICE
INTERMOUNTAIN REGION
12795 West Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287

IN REPLY REFER TO:
NR-RSS

MAR 19 2015

Colorado Water Conservation Board
1313 Sherman Street, Room 721
Denver, Colorado 80203

Dear Board Members:

The National Park Service (NPS) respectfully submits the following comments and questions regarding the Basin Implementation Plans (BIPs) and the Colorado State Water Plan (Water Plan or CWP). Our comments are consistent with the NPS mission -- to preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education and inspiration of this and future generations. The NPS' Colorado River Basin Parks Program includes eleven units within the Colorado River Basin that encompass 1,130 river miles and more than 5 million acres of surrounding land. Management decisions regarding the river system have the potential to affect the unique natural, cultural, and recreational resources of these park units including those downstream in other states.

I. Goals for the Environment and Recreation

Concerns and challenges with Colorado River supply and demand

We support and share your concern regarding risk of shortage in the Colorado River basin, that "*the gap between our water supply and water demand is real and looming*" (CWP-pg 1) and that "*climate change and associated impacts make it more difficult to meet Colorado's future water needs because of diminishing suppl[y]*" (CWP - pg 3).

Environmental and recreational values to be protected

We also agree that it is necessary and appropriate to highlight the exceptional environmental and recreational values within the State of Colorado. We share your goal to "*honor Colorado's water values and ensur[e] that the state's most valuable resource is protected and available for generations to come*" (CWP - pg 4) and agree that Colorado's multipurpose water projects should include language about "*protecting the health of rivers, streams and watersheds*" (CWP - pg 5).

Desire to use water the most efficiently

We agree with Governor John Hickenlooper's statement that "*Every conversation about water should start with conservation*" (CWP -pg 145). Given that "*future supply of Colorado River water is highly variable and uncertain*" (CWP - pg 282), the NPS believes, along with the western slope basin roundtables, that minimum water conservation for future scenarios should be changed from "*low to medium*" to "*high*" (CWP - pg 99) to more adequately address the gap between water supply and demand. We agree with the InterBasin Compact Committee (IBCC) work to further define what is meant by, and to set, "*high conservation standards*" (CWP - pg 76 and pg 274), particularly for municipal and agricultural efficiencies. Water conservation and efficiency could positively affect the resources in the national park units if that water was kept in the streams.

II. Environmental and recreational water quality and quantity

Encourage inventory for environmental and recreation purposes

Many projects listed in the BIPs seek to protect environmental and recreational resources via inventories of agricultural uses and existing infrastructure. While we agree it is important and necessary to inventory agriculture-related needs and conditions, we feel it is equally important to explicitly inventory and evaluate streams to identify key reaches with high (or low) environmental and recreational value, and those that are most in need of protection from threats to water quality and flow-dependent resources and values. We particularly encourage these inventories in the Gunnison Basin above Curecanti National Recreation Area and Black Canyon of the Gunnison National Park, and in the Yampa Basin above Dinosaur National Monument, as well as the Colorado Basin which is upstream of Canyonlands and Arches National Parks.

Identify more on-the ground projects for water quality or environmental improvements

We also encourage more action projects in all the BIPs to restore and address water quality and environmental concerns. We fully support those projects identified in the Colorado BIP that take steps towards on-the-ground environmental and recreation protection, and those in the Gunnison BIP that identify and address water quality concerns. More of these types of projects would help further meet BIP goals to ensure that key reaches are protected to the appropriate degree and to provide environmental and recreation benefits to the park units, the basins and the State.

Current in-stream flow protections of base flows may not protect all environmental and recreation purposes

Throughout the CWP and the BIPs, many references to existing in-stream flows imply that protection of minimum flows (i.e., base or subsistence flows) adequately protects all environmental and recreational uses. While in-stream flow protections for base flows are a good first step, it may be incorrect to assume that protection of just the minimum base flow will be sufficient to protect all environmental resources and/or recreational uses. Fish, sediment, and vegetation resources are influenced by peak and base flows, as well as other aspects of flow transitions, and in many cases have specific needs for both, as well as other specific flows, to maintain their quality and dynamic condition. It may be appropriate to evaluate whether existing in-stream flow protection is sufficient for environmental and recreational uses.

III. Concerns regarding risk associated with basin diversions

Risks and uncertainties related to water availability

We share the concerns raised by West Slope basins regarding increased risk in the Colorado River Basin from new supply projects, especially trans-basin diversions (CWP- pg 282-284). There has been a great deal of discussion in the roundtables about information which supports the idea that the Colorado River is currently over allocated. Uncertainty in climate change futures, changes in average inflow to Lake Powell, and incomplete information surrounding basin water commitments (e.g., existing water rights) result in uncertainty over the amount of water that is currently available for diversions out of the Upper Basin. During the West Slope Basin Meeting in December 2014, there was a call for more information on existing water commitments in each basin. The last Upper Basin hydrologic determination was completed in 2007, thus we are a long way from complete quantification of water rights and commitments in each basin. We support further data and information collection in order to better determine the water availability in these basins as it would help assess the potential impacts to our downstream national park units. Until there is more complete information available regarding commitments in each of the basins and less uncertainty in future water availability under climate change scenarios, concerns will remain related to any large future transmountain diversions.

Concerns related to diversions in wet years

We agree that *“Drought and dry periods have significant and lasting impacts on water supplies and availability for years, while wet years offer relief with as much as six times the amount of annual water*

supplies compared to dry years" (CWP -pg 56). Wet years refill reservoirs, like Lakes Powell and Mead, which are critical to the water infrastructure of the West. If wet-year water is instead diverted and used to supplement dry-year consumptive uses (CWP, IBCC Conceptual Agreement – pg 3), not only are reservoirs not refilled, but many of the aquatic and riverine ecosystems and associated wetland systems that depend on these high-flow wet years will be further imperiled. NPS recognizes the rights of states to develop their water and appreciates the State of Colorado's efforts on the CWP. Yet we remain concerned about the increasing risk of shortages and their effects not only on the environment and recreation, but also on agriculture, municipalities and industry. We agree with several of the roundtables that if new diversions are planned there is a need for thorough data collection and the need to quantify and evaluate impacts prior to setting aside water rights (CWP - pg 283). This would allow us to assess the impacts to our downstream resources in the park units.

IV. Economics metrics and trends for all sectors

Need for consistency in economic metrics

The CWP and BIPs use specific metrics (e.g., amount of water diverted and consumed, jobs generated, and dollars generated, etc.) to describe the contribution of agriculture to the regional and state economy (e.g., CWP –pg 78 and 118). These same reports also state that “[o]utdoor recreation (including hunting, fishing, biking, hiking, skiing, golfing, wildlife watching and many other types of outdoor activities) significantly contributes to Colorado’s economy, with non-consumptive water-based recreation an important part of that economy” and that “Healthy watersheds, rivers and streams, and wildlife are vital to maintaining Colorado’s quality of life and a robust economy” (CWP – pg 212). It would therefore seem appropriate to use the same metrics to compare and contrast the different uses of water (agriculture, hydropower, environmental and recreational) in terms of (1) amount of water diverted and consumed, (2) number of local and regional jobs supported, (3) dollars generated and infused into the local and regional economies, and (4) expected trends over time. This would provide clarity and allow for comparison of the economic value of consumptive and non- consumptive uses.

V. Drought contingency

Need inclusion of resource protection in priorities for drought contingency

Please include “*protection of in-stream natural resources, including endangered fish and other natural resources,*” as one of the principles for the contingency planning. On page 18 of the CWP, in legal and institutional setting, it currently mentions only power generation. Protection of downstream resources has been mentioned as a priority in discussions at the roundtables as well as in discussions with CWCB staff, so we agree with those sentiments and suggest that wording to that effect be included in this plan. Flows out of Flaming Gorge Dam and Aspinall Dam directly affect resources within National Park units as well as the endangered fish within these reaches.

Thank you for this opportunity to comment on the Colorado Water Plan and the Basin Implementation Plans. And thank you for incorporating in your December 2014 draft, many of the comments from our November 2014 letter. We look forward to working with the State of Colorado further on the Water Plan and issues affecting NPS system units which arise from it. Please contact Rob Billerbeck, NPS Colorado River Coordinator for additional information on these comments or for more in-depth discussion about them. Rob can be reached by telephone (303-987-6789) or by electronic mail at rob_p_billerbeck@nps.gov.

Sincerely,



Sue E. Masica
Regional Director

cc: NPS Colorado River Steering Committee Members:

- Christine Lehnertz, Regional Director, Pacific West Region
- Ray Sauvajot, Acting Associate Director, Natural Resource Stewardship and Science
- Mark Foust, Committee Chair and Superintendent, Dinosaur National Monument
- Dave Uberuaga, Superintendent, Grand Canyon National Park
- Todd Brindle, Superintendent, Glen Canyon National Recreation Area and Rainbow Bridge National Monument
- Bruce Noble, Superintendent, Black Canyon of the Gunnison National Park and Curecanti National Recreation Area
- Kate Cannon, Superintendent, Arches National Park and Canyonlands National Park
- Patrick Gubbins, Acting Superintendent, Lake Mead National Recreation Area

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- Tammy Whittington, Associate Regional Director, Resource Stewardship and Science, Intermountain Region
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- Ed Harvey, Chief Water Resources Division, Natural Resource Stewardship and Science
- Bill Hansen, Water Resources Division, Natural Resource Stewardship and Science
- Mark Wondzell, Water Resources Division, Natural Resource Stewardship and Science

Basin Implementation Plan Representatives:

- Michelle Pierce, Gunnison Basin Roundtable Chair
- Jon Hill, Yampa Basin Roundtable Chair
- Jim Pokrandt, Colorado River Roundtable Chair