

From: [Ken Brenner](#)
To: [dougmonger](#); [webster.jones](#); [haskywild](#); [tom](#); [Lyn Halliday](#); [redmondjv](#); [Nicole Seltzer-UYWCD \(nicaseltz+UY@gmail.com\)](#); [Katie Berning](#); [kpbrennersteamboat](#)
Cc: [Andy Rossi](#); [Deb Bastian](#); [Emily Lowell](#); [Holly Kirkpatrick](#); [Karina Craig](#); [Bob Weiss](#)
Subject: Fwd: ywg presentation
Date: Wednesday, January 17, 2024 12:06:38 PM
Attachments: [YWG1.10.pdf](#)

UYWCD Directors,

Here is a brief summary of last week's Big River Committee (BRC), Public Education Participation (PEPO) and Yampa White Green BRT meetings on January 10, 2024

BRC

After a short summary of our comment letter to the Bureau of Reclamation regarding the draft SEIS, we focused on the recommendations from the Drought Task Force (DTF). Senator Roberts joined us virtually and explained that additional funding would be sought for infrastructure and storage during the session. He also said that increased flexibility for the CWCB's in-stream flow program and additional funding for front range turf replacement would be priorities. Thanks to the letter from UYWCD, there was vocal support for our position regarding the proposal from Tri-state for industrial water. The BRC also resolved to follow any legislative effort coming from the DTF recommendations.

PEPO

After discussing the committee's finances, it was decided that Community Ag Alliance (CAA) would begin preparing an additional grant application for WSRF funds to support PEPO activities in Northwest Colorado in time for our March meeting.

We then received an update from Patrick regarding the status of the three minute video Introducing the Yampa white green round table that will be at the top of our webpage. We should see a draft for final review at our next meeting in March.

We also got an update from Yampatika, led by Kristen Jespersen, explaining a storyboard proposal for Northwest Colorado. The storyboard would be an interactive GIS map that would allow someone to investigate all of the nuances of agencies, governments, NGO activity, Conservancy Districts, facilities and other water related activities in Northwest Colorado. The initial work on the project should be completed by late summer.

Yampa White Green BRT

We reviewed and ratified the December 11, 2023 comment letter to the Bureau of Reclamation regarding the DSEIS.

Jeff Rodriguez from the CWCB updated us that a new climate report had just been released. Jeff also mentioned the Soil Moisture Monitoring Program, one that we're already participating in, is looking for statewide participation through February 5, 2024. Colorado State University, Colorado River District, and Yampa Valley Sustainability Council were acknowledged for their leadership.

The CWCB will be working on a "Stakeholder Guide" for the BRTs and will visit all of the BRTs to receive input. We currently have one that we referred to as a handbook, but there may be some additions that are best practices coming from DNR.

I was asked to mention that the next IBCC meeting will be February 27 in the Denver area. Noteworthy is that the meeting is not two hours, but scheduled from 9am - 4pm with the intent of more robust discussions of how to best implement the intent of HB05-1177.

Mike Camblin and Jackie Brown updated us on the DTF recommendations. There were very

pointed comments made critical of the proposal regarding industrial water and urging from the group not to pursue any such legislation.

Amy Ostdiek mentioned that comments from CWCB, CRD, UCRC, and YWG BRT to the Bureau of Reclamation regarding the DSEIS were very similar in nature. We thanked her for her leadership and the pointed message that they delivered to the lower basin states. She also said that Colorado's participation in the SCPP included 51 proposals totaling (only) 17,000 acre feet of water were being evaluated but she did not have information from the other upper basin states.

Jonathan Bowler with the Headwaters of the Colorado project gave a 30 minute presentation (PDF attached to this email for you). There were lots of questions, but generally good enthusiasm for the project. The next big stakeholder meeting will likely be from 10-1pm, February 7, probably in Craig/Hayden.

Grant proposals were reviewed and approved for approximately \$9,000 of BRT \$ for infrastructure on the Ain't Lyon property north of Hayden, \$25,000 of BRT funds and \$161,000 of statewide funds for the Nickell diversion structure on the Bear River next to the town of Yampa. We also updated new guidelines for grant proposals and letters of support from the BRT. We then approved updating the CWCB's BIP IPP list with an updated list of our projects and recommendations from the Yampa IMP.

Erin Light introduced Brian Romik as the new Yampa River Coordinator and said that she expected to also hire a full-time hydrologist soon. She also announced that DWR had settled the last stipulation on the Measurement Rules and expected the final approval the week of January 19.

Rebecca Briesmoore from the Colorado River District announced the \$95 million purchase of the Shoshone Power Plant and 1250 CFS water right in Glenwood Canyon. That was followed by an enthusiastic round of applause. The sale is not complete as all of the money has not changed hands but the sources have been identified. \$20 million will come from the CRD Community Outreach Program and they will put more emphasis into funding in the Yampa and Gunnison Rivers to make up for the disproportionate spending on the Colorado main stem.

The next meeting will be March 13 and we adjourned.

Ken Brenner
Upper Yampa Water Conservancy District, Director
Colorado Water Congress, Boardmember
Yampa White Green Roundtable, Boardmember/IBCC
FIS Alpine Technical Delegate
PO Box 772631
Steamboat Springs, Co 80477
970-819-6178

Jonathan Bowler
Watershed Coordinator
Headwaters of the Colorado Initiative
307-380-3232

Headwaters of the Colorado Initiative



YAMPA, WHITE,
GREEN BASIN
ROUNDTABLE
JANUARY 10, 2024

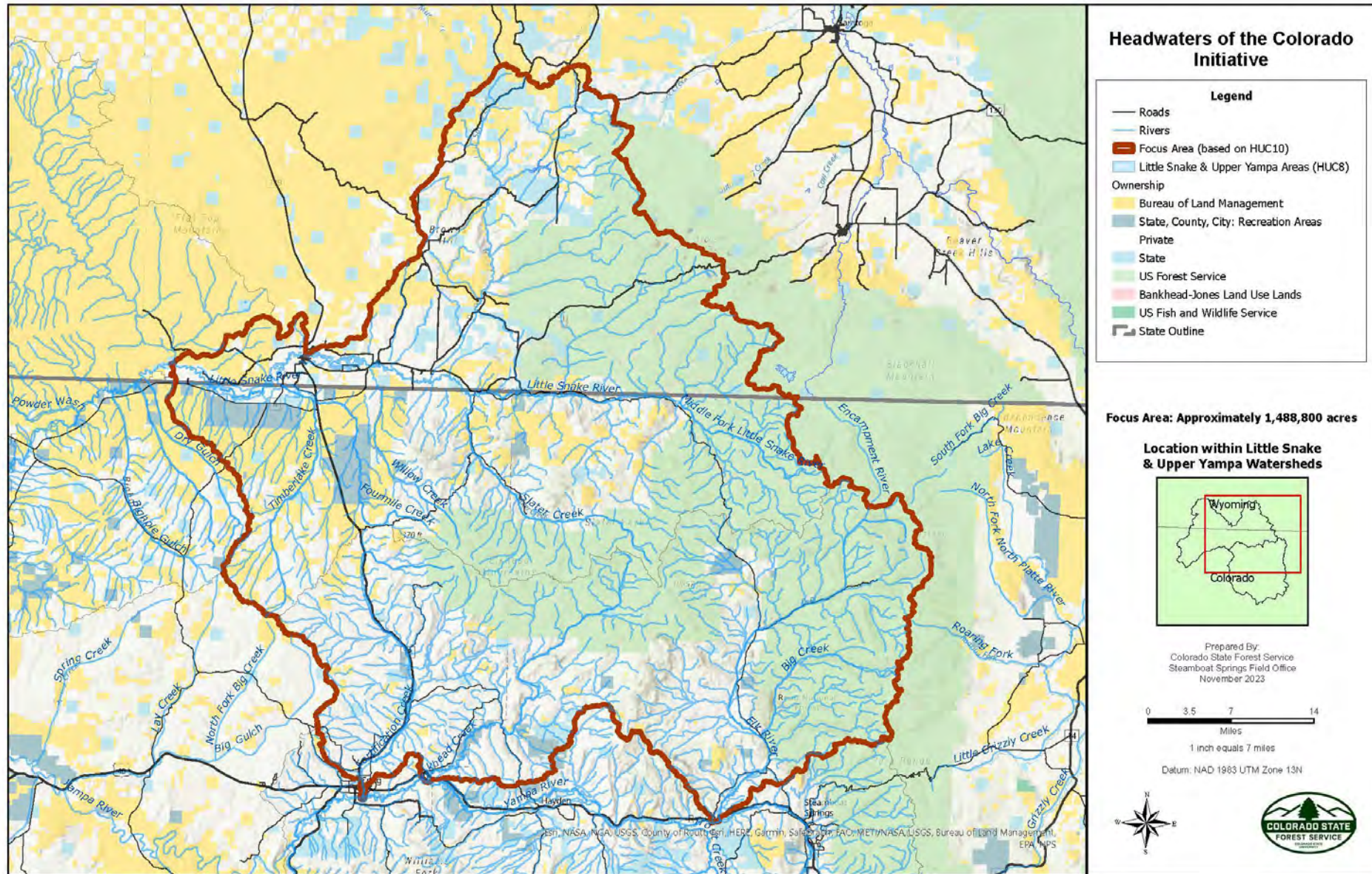


A collaborative endeavor to improve forest, range and watershed function across jurisdictional lines in the Little Snake and Yampa River drainages



Collaborative Partners

- USFS
- BLM
- CO State Forest Service
- WY Forestry Division
- Senator Bennet's Office
- Wyoming State Legislature
- Carbon County WY
- Routt County CO
- Moffat County CO
- University of Wyoming
- Colorado State University
- The Nature Conservancy, WY Chapter
- National Forest Foundation
- Western Landowners Alliance
- Yampa Valley Sustainability Council
- Little Snake River Conservation District
- Savery-Little Snake River Water Conservancy District
- Ladder Ranch
- Mountain Pine Manufacturing
- All are Welcome!



Headwaters of the Colorado (HoC) timeline

- 2022: Walton Foundation support for issues and needs analysis
- March 2023: Initial partner meeting - Laramie, WY
- April – July 2023: Mission, vision, goals and objectives development
- July 2023: Partner meeting – Steamboat Springs, CO
- September 2023: NFF and WLA join to serve as fiscal and staffing sponsors
- October 2023: Capacity and outreach funding received from the Water Foundation
- October – December 2023: Organizational Charter and Steering Committee established
- November 2023: Partner meeting – Laramie, WY
- December 2023: BuRec WaterSMART grant submitted
- December 2023: Steering Committee meetings – virtual and Craig, CO.
- February 2024: Next Partner meeting to be scheduled





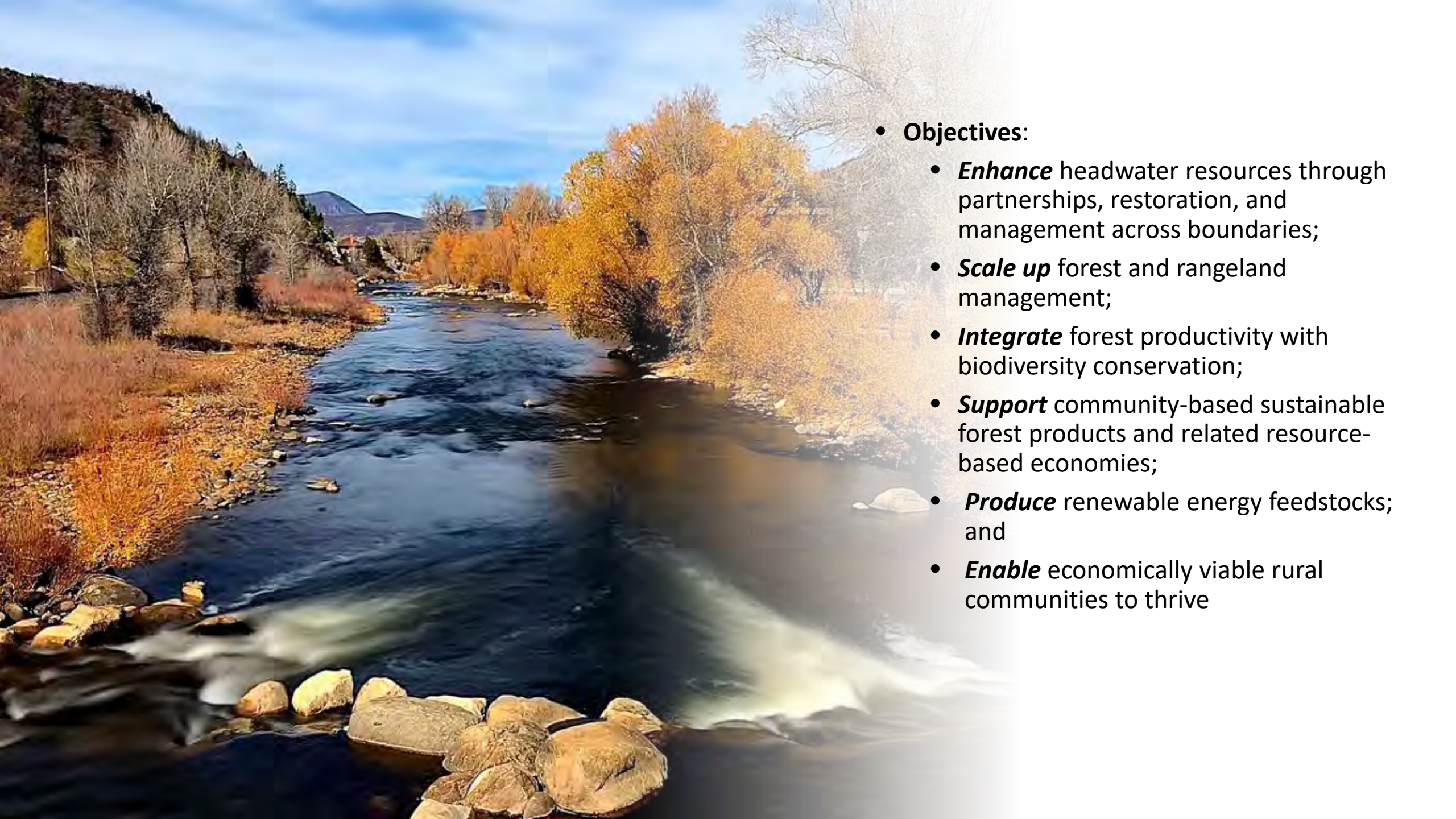
Vision: Demonstrate landscape resilience within dynamic conditions through a fully functioning high-altitude forest in the headwaters of the Colorado River that benefits local communities, ecosystems, and economies.



Mission: Create a resilient and functioning forested headwaters within the landscapes of the Little Snake and Yampa Rivers of Wyoming and Colorado through science-based ecosystem planning, coordinated partnerships, focused funding, and collaboration across all lands.



- **Goals:** Proactively address ecological and social stressors driving ecosystem change to achieve the following goals:
- Increase water storage and supply, and water quality;
- Increase agricultural production, including agro-forestry;
- Improve and maintain forest health and sequester carbon;
- Decrease the threat of catastrophic wildfire;
- Protect communities & infrastructure; and
- Improve wildlife habitat and fisheries and increase biodiversity



- **Objectives:**

- **Enhance** headwater resources through partnerships, restoration, and management across boundaries;
- **Scale up** forest and rangeland management;
- **Integrate** forest productivity with biodiversity conservation;
- **Support** community-based sustainable forest products and related resource-based economies;
- **Produce** renewable energy feedstocks; and
- **Enable** economically viable rural communities to thrive



Next Steps

- Schedule next HoC partner meeting: TBD, 1st weeks of February
- Continue outreach to stakeholders
- Coordinate and fund cross boundary expansion of existing restoration projects
- Begin Watershed Restoration Plan process
- Project planning
- Project implementation

Thank You!

Questions / Comments

To get involved or learn more, contact:

Jonathan Bowler
HoC Coordinator

307-380-3232

headwatersofthecolorado@gmail.com





Ms. Camille Touton
Bureau of Reclamation
1849 C Street NW
Washington, DC 20240

December 11, 2023

Subj: Comments on the SEIS Draft 2 for Near-Term Colorado River Operations

Dear Commissioner Touton:

Thank you for this opportunity to comment on the recent Draft Supplemental Environmental Impact Statement (SEIS) for Near-Term Colorado River Operations.

The State of Colorado facilitates and organizes water planning through a Roundtable structure. Each of the nine Basins in the State is represented by a Roundtable of elected and appointed members and works autonomously as well as collaboratively with others to address projects and policy issues both intra-and inter-Basin, and across the State. The Yampa/White/Green Basin Roundtable (BRT) serves in this capacity for three important tributaries to the Colorado River.

Our Basin has a keen strategic interest in the current discussion for both pre- and post-2026 operations on the River. Citizens of our Basin will be directly impacted by the decisions that the Bureau, together with the Upper and Lower Division states, make in attempting to mitigate shortages. All classes of water users in the Yampa/White/Green have already experienced natural curtailment, that is, reductions in available water during the past two decades of drought. Awareness of the need for operational changes, and the Lower Division States' continued water use beyond Compact allocated amounts, is high in our Basin.

We commend the Bureau for acting in a timely way to change operations, which up to this point are managed through the 2007 Interim Guidelines. The 2007 Guidelines are flawed, and have led to overuse in the Lower Division, and historically-low reservoir levels that put all Colorado River water users at risk. By acting before the Guidelines expire in 2026, the Bureau has the opportunity to put the Colorado River system on a more sustainable near-term footing until the Guidelines are revised. Having said that, the Y/W/G BRT has serious concerns with the outcome of the Draft SEIS. Our comments follow.

1. In this draft of the SEIS the Bureau has selected the Lower Division Proposal (LDP) as the Proposed Action. Our understanding is that much of the conserved consumptive use in the LDP is voluntary and compensated through Federal funding. Given the serious nature of the state of the system, we suggest that it may be unwise to rely on voluntary conservation measures in the LD. How will reductions be tracked and verified? What will happen if voluntary reductions at the levels proposed are not achieved? Further, we note that many of the reductions in usage are already a part of the LD's Drought Contingency Plan (DCP) and 2007 Interim Guidelines cuts. Are we proposing to pay the LD for reductions that would have been required anyway? Is there adequate additional risk reduction, given that a significant portion of the LDP reductions would have been taken regardless of the Bureau's efforts through this SEIS and Proposed Action?
2. The LDP includes a static reduction of 750 KAF in WY 2024; how will this be achieved? On what basis will the reduction be compared to contracted amounts? In other words, what will prevent the LD from proposing a higher release contract volume, and then accepting a reduction of 750 KAF, bringing the release volume to an amount near or at the level of a recent contract volume?
3. The LDP represents roughly half of the reductions originally put forward in Action Alternatives from the first Draft SEIS. Recognizing the hydrological improvements from the winter of 2022/2023, it is overly optimistic to allow significantly smaller reductions based on a single year of positive hydrology. Records indicate that only 6 of the past 24 years have produced at or above-average precipitation in the Colorado River Basin. Prevailing science indicates that a more conservative approach is needed.
4. With respect to the cuts proposed in the LDP, in addition to the operational and accounting issues cited previously, implications of this much smaller reduction may include reinforcing the already-entrenched mindset of overuse in the Lower Division. The impact on the post-2026 operational guidelines may also be substantial.
5. The new draft justifies acceptance of the LDP over the previous Action Alternatives, stating that it provides for greater risk reduction. On the surface, it is unclear how a reduction of 3.0 MAF (LDP) reduces risk more than a reduction of 6.2 MAF (Action Alternatives). After a review of the assumptions used in modeling and analysis, we understand that the Bureau elected in its model to shift the reductions in the Action Alternatives out a year, beginning in 2025 rather than 2024. This change in the modeling assumptions accounts for the difference in performance. It is therefore misleading to state that the LDP "achieves many of the same objectives as Action Alternatives 1 and 2 ... but with additional risk reduction" (from the Dear Reader preface to the SEIS.) The difference in risk reduction stems solely from changing the modeling assumptions.
6. No mention is made in the SEIS of the unaccounted-for evaporation and transportation losses in the LD system. The reductions in the LDP of 3.0 MAF over 3 years are less than the system losses of 1.5 MAF/year. By accepting the LDP, the Bureau is in effect enabling this issue to remain unaddressed.

In summary, we urge the Bureau to revise the conclusions of the draft SEIS; make the Lower Division's Proposal a SEIS Alternative and put forward a Proposed Action with more significant reductions in Lower Division usage that are aligned with the Action Alternatives originally proposed. We strongly suggest a Proposed Action with verifiable, accountable results. If Federal tax dollars are to be used to compensate LD water users for conservation, we believe that compensation should only be paid if (1) the LD brings its total usage in line with the Compact allocated amount of 7.5 MAF annually; and (2) an inter-divisional agreement on the methodology of accounting for evaporation and transit loss is reached and implemented; and (3) any compensation is paid only for conserved consumptive use above and beyond those amounts already planned in the LD's DCP and Operational Plans.

Again, we thank you for the opportunity to comment on the draft SEIS. We commit to working with the Bureau and representatives of Upper and Lower Basin States to find long-term solutions that will be practical, sustainable, and benefit all people in the Colorado River System.

Sincerely,

Stephen R. Hinkemeyer

Stephen R. Hinkemeyer,
Yampa-White-Green Basin Round Table Chair

cc: Michael Brain, Dept of Interior
Becky Mitchell, UCRC
Lauren Ris, CWCB