# COMMENTS ON THE DRAFT PHASE I REPORT
# COLORADO WATER AVAILABILITY STUDY
## Submitted by
## Yampa / White / Green River Basin Roundtable
Wed July 21nd, 2010

Dear Ray Alvarado,

The Yampa White Green River Basin Roundtable (The Roundtable) appreciates the opportunity to comment on the Draft Phase I Report of the Colorado Water Availability Study.

General Comments

The Roundtable is concerned that there will be a tendency by water project proponents to use Phase I as a means to identify existing levels of water use, and thereby water quantities available for future uses, as a stand-alone document. Yet the reality is that water availabilities will change once Phase II is incorporated. We suggest adding additional text to clarify that Phase I and II should not be utilized independent of each other.

Considering the length of time the CWRAS will be active, The Roundtable recommends a detailed description of what mechanism will be used to assure the most current demands and future needs assessments are incorporated into projections. An information feedback loop is necessary to assure that as water demands and future water needs are changed, the study remains current.

Specific Comments

Page 3-40- The Roundtable would like clarification regarding the calculations used to determine annual crop irrigation requirements. We would specifically like to know if the high altitude coefficients modified by CDM Consultants in 2009 in the Yampa /White/ Green Roundtable Agricultural Study were incorporated. These Coefficients dramatically increase the quantities of water consumed for high altitude crop production. If the high altitude coefficients have not been incorporated into Phase I, we request their consideration to assure accurate consumption records. The last bullet point on page VII of the Executive Summary highlights that current water uses were used in Phase I, therefore it is important to the Roundtable to understand the level the revised 2009 modified high altitude crop coefficients and return flow data were incorporated.

Page 2-5 and Page 3-12 -The Colorado River Simulation System (CRSS) was used to make quantitative estimates of the amount of consumptive use available. The Roundtable would like clarification if the 2009 adjusted high altitude coefficients, described above, were considered in the CRSS evaluations.

Page VII Executive Summary- the second bullet point highlights Phase I's reliance on computer models. The Roundtable requests additional wording to identify the inherent shortfalls of modeling to simulate current water demands, as well as an acknowledgement that the Phase I results do not present a complete picture of water demands without Phase II information.

Page 2-43 – 2-44- The section on Forest Change Hydrology discounts any effect beetle killed trees will have on basin hydrology by making assumptions that natural reforestation and small wildfire sizes

(<30% of a watershed) will offset or negligibly impact runoff. The Roundtable requests an analysis of a scenario where net runoff is increased. The roundtable believes there is a realistic scenario where civiculturists have grown in their understanding of proper functioning forests, and considering the recent history of large catastrophic wildfires and forest devastating beetle-kill, that forestry practices have evolved to the point that society will not see the same vulnerable dense stands of forests that society sees today. Stands could be managed in manner that will not be as susceptible to these catastrophic events, thereby yielding more water than today's forests do. Therefore, the *CRWAS makes* an assumption that runoff yields will be greater during the immediate future of tree die-off and then be decreased in 40 years when trees grow back thus rendering a net neutral runoff from forests. The Study assumes that that forest managers will allow the forest to return to the existing state, when it is more likely that foresters have learned from their past challenges and future healthy forests could yield more runoff than today's forests. The Roundtable requests an analysis of water runoff assuming proper forest management practices.

Sincerely,

Tom Gray, Chairman
Yampa White Green Basin Roundtable