

Date

ATTN: Trisha Oeth
Water Quality Control Commission
Colorado Department of Public Health & Environment
4300 Cherry Creek Drive South, A-5
Denver, CO 80246

Re: WQCC Regulation 33 & the City of Steamboat Springs' proposed Temporary Modification of the Stream Standard for Temperature for Segment COUCYA02B of the Yampa River

To the Water Quality Control Commission:

The City of Steamboat Springs is located in Routt County, Colorado, with a permanent population of approximately 12,700 (United States Census Bureau, 2016), and is home to abundant year-round recreation that includes skiing, hiking, biking, camping, and fishing. The Steamboat Springs Wastewater Treatment Plant (WWTP) provides wastewater treatment for not just the city but also multiple water and sewer districts within Routt County.

Routt County agrees the City of Steamboat Springs meets the criteria for its proposed temporary modification of the temperature standards for Yampa River Segment 2B for the following reasons:

- 1) Current temperature data for this segment indicates exceedances (non-attainment) of the underlying temperature standards.
- 2) Due to these exceedances, it is predicted that the City's (WWTP) may be unable to meet temperature standards that could ultimately require economically burdensome upgrades to the WWTP.
- 3) Significant uncertainty exists about a) the water quality standard necessary to protect current and/or future beneficial uses; and b) the extent to which the existing quality is the result of natural or irreversible human-induced conditions in Segment 2B of the Yampa River.

The City developed the 2018 *Yampa River Health Assessment and Streamflow Management Plan* with Routt County's support. This plan identified a long-term strategy for protecting and improving the health and resiliency of the Yampa River near Steamboat Springs by setting multiple objectives including one to *maintain compliance with State water quality standards and regulations for CS-II temperature standards or as modified by the WQCC*. Models of observed streamflow, water temperature, and air temperature indicated that streamflow management and riparian forest restoration are effective tools for controlling stream temperatures on the Yampa River but that exceedances of the CS-II standard could not reasonably be eliminated. This finding points to a greater uncertainty around the appropriateness of the stream standard for this segment.

Routt County is rural and its communities have limited means to address stream health issues of this magnitude but supports the City's efforts to prioritize natural infrastructure improvements over built infrastructure that are costly, energy-intensive, and do little to address the health of the Yampa River as

a whole. Routt County is committed to building a climate-resilient community and looks to the Water Quality Control Division to work with the City of Steamboat Springs on sustainable solutions for addressing stream temperature and river health. We also recognize that innovative solutions take time. Therefore, the Routt County Board of Commissioners respectfully requests that you support the City of Steamboat Springs' proposed temporary modification to the stream standard for temperature for Segment 2B of the Yampa River.

Respectfully,

Routt County Board of Commissioners