

COLORADO WATER QUALITY CONTROL COMMISSION  
STATE OF COLORADO

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IN RE: RULEMAKING FOR CONSIDERATION OF REVISIONS IN THE BASIC  
STANDARDS AND METHODOLOGIES FOR SURFACE WATER, REGULATION #31  
AND ADOPTION OF NUTRIENTS MANAGEMENT CONTROL REGULATION #85

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RESPONSIVE PREHEARING STATEMENT OF THE ORCHARD MESA SANITATION  
DISTRICT, GRAND JUNCTION, COLORADO

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The Orchard Mesa Sanitation District (District) hereby submits their rehearing Statement.

**I. WRITTEN TESTIMONY**

This Prehearing Statement and Exhibits will serve as the Orchard Mesa Sanitation District's written testimony.

**II. LEGAL AUTHORITY AND SUMMARY OF POSITION**

The Orchard Mesa Sanitation District is a Title 32 Special District that provides sewer service to a population of approximately 9,000, located southeast of the City of Grand Junction. Much of the District is located in unincorporated Mesa County and serves a mixture of residential subdivision developments and rural agricultural areas. The District's wastewater is conveyed to and treated at the Persigo Wash Regional Wastewater Treatment Plant (WWTP) that is jointly owned and operated by Mesa County and the City of Grand Junction. As such, the proposed nutrient regulations will impact the District's customers in the form of potential rate increases that could occur as a result of improvements that may be necessary at the treatment facility. The District Board of Directors authorized the District Manager to apply for Party Status to the above referenced proceeding before the Water Quality Control Commission and submit this Prehearing Statement on behalf of the District.

The District further supports the positions outlined in the separate Responsive Prehearing Statements of the City of Grand Junction, Mesa County, and the 5-2-1 Drainage Authority. The District's customers are either partially or entirely within the respective jurisdictions of each entity.

**III. STATEMENT OF FACTUAL AND LEGAL ISSUES**

The District submits the following factual and legal issues affecting the District regarding both Regulation #31 and Regulation #85.

A. Regulation #31

The proposed interim water quality based numeric values included in proposed Regulation #31 are not scientifically defensible, and have not been properly vetted through peer review. The Colorado Nutrient Coalition's (CNC) Prehearing Statement calls into question several of the points of evidence that the Water Quality Control Division (Division) used in developing the interim values through the use of stressor-response statistical methods. The District supports the position of the CNC in disputing the Division's science as outlined in the CNC Prehearing Statement.

Although the Division has acknowledged some of these facts, and has stated that the values are interim criteria, if the interim values are adopted by the Commission, it is an acknowledgment that the criteria used to develop these values is based on sound science. This is not the case as made clear in the CNC expert witness testimony attached to their Prehearing Statement. Further, the Division's use of stressor-response statistical methods to develop numeric values and set stream standards has also been called into question by EPA's Science Advisory Board. The Commission should delay implementation of Regulation #31 until adequate peer review can be conducted on the science used at deriving the numeric values.

The District also has concerns that without a statewide policy of how narrative standards will be interpreted, the interim values of Regulation #31 could be translated through a narrative standard interpretation to override the technology based effluent limits established in Regulation #85, as well as the variances and exemptions proposed in Regulation #85. A statewide policy of how the narrative standards are to be interpreted should be put into place prior to Regulation #31 being adopted.

B. Regulation #85

Regulation #85 proposes technology based effluent limits for all non exempt domestic WWTPs across the State that includes the Persigo Wash WWTP. The regulation further requires that all domestic WWTPs and MS4 stormwater dischargers monitor their point source discharges to receiving waters, as well as the receiving waters near their respective discharges.

The proposed Regulation #85 would be adopted on a statewide basis with little regard to determining whether nutrient dischargers are impairing, or projected to impair, beneficial uses of the receiving water, and which nutrient parameter (total phosphorus or total inorganic nitrogen) may be the limiting factor (i.e. the nutrient that is controlling plant growth). This approach has the potential for requiring substantial capital investments be made (at Persigo Wash WWTP as well as other WWTPs across the State) with little regard to the potential benefit, or lack thereof, to the receiving stream. The only possible way that a statewide control regulation can be justified by the Commission is for the Division to demonstrate that all WWTP discharges are presently causing harm to Colorado's receiving waters on a statewide basis.

By example, the Division's own sampling regiment of the Colorado River in the Grand Junction area indicates that the receiving stream is not nutrient impaired based on the interim values established in Regulation #31. Despite this fact, Regulation #85 would require that improvements be made to the Persigo Wash WWTP simply for the sake of meeting the technology based effluent limits which will result in no noticeable benefit to the receiving water (preliminary rough estimates of necessary improvements to the Persigo Wash WWTP have been approximated at \$24 million dollars, of which a portion will be paid for by the District's customers in the form of user charge rate increases).

Regulation #85 further requires that all domestic WWTPs commence on monitoring of nutrients, both at the discharge and in the receiving stream near the point of discharge. Although the District supports the concept of monitoring to provide additional data, to place the burden entirely on domestic WWTPs and stormwater MS4 dischargers is an undue burden that will need to be borne by rate payers and constituents within the service area boundaries of the respective entities. The Commission needs to realize this is not a light financial burden, in particular for smaller communities. By example, the 5-2-1 Drainage Authority has estimated the cost could be upwards of \$100,000 annually, representing 40% of its present annual operating budget (reference 5-2-1 Drainage Authority Prehearing Statement). Rather than requiring this monitoring burden be placed on the respective discharges across the State, a statewide monitoring plan that identifies not only point source but non point source nutrient contributions, as well as nutrient impaired stream segments should be established and funded through the state legislature.

C. Application of Regulation Does Not Comply with the Governor's Executive Order D 2011-005

The Governor's Executive Order, D 2011-005 (Exhibit A) specifically states that no State agency shall promulgate any regulation creating a mandate on local governments to the extent authorized by law unless the following tests are met:

1. The mandate is specifically required by federal or state law;
2. The agency consults with local governments prior to promulgation of the regulation; and if this consultation has occurred;
3. The state government provides the funding necessary to pay for the direct costs incurred by local governments in complying with the regulation.

As to Item #1, there is specifically no federal mandate or law requiring regulation of nutrients despite the Division's previous position that EPA is mandating these regulations. EPA has no authority to mandate a technology based limit under the Clean Water Act. The Division's position appears to be an attempt to comply with Item #1 of the Governor's Executive Order, and is misleading as to the reason the Regulations are needed.

Having obviously not passed this first test of the Executive Order, Item #2 requires the regulatory agency to consult with local governments prior to promulgation of the Regulation.

This has been met by the Division. Over the past several years the Division has conducted numerous nutrient workgroups with the stakeholders, and the District commends the Division for this process. Having met this test however, the State government is to provide the necessary funding to pay for the direct cost incurred by local governments for complying with the Regulation. This test certainly has not been met.

The Cost Benefit analysis completed by Camp Dresser and McKee (CDM) estimated that the total cost for implementing Regulation #85 could be upwards of \$2.4 billion. The State government has no fiscal means of even remotely funding the necessary improvements to comply with the Regulation, with the only current option being the State Revolving Loan Fund as administered by the Colorado Water Resources and Power Development Authority (CWRPDA). The CWRPDA's current clean water needs list totals \$2.9 billion. Adding an additional \$2.4 billion would create a total backlog of nearly \$5.3 billion dollars. At a current loan capacity of approximately \$30 million per annum, it would take over 100 years to fund all of the improvements through the State Revolving Loan Fund program. Obviously this funding source fails to meet the Governor's Executive Order test, and the burden of funding the necessary improvements to comply with Regulation #85 would fall to local governments, including the District's customers.

D. Division's Alternate Proposal for Geographic Exemptions

Since the proposed Regulation does not comply with the Governor's Executive Order, the Commission should consider modifying the Regulation to site specific nutrient impaired waters on a geographical basis as noted in the Division's Prehearing Statement. The Division has requested input on the potential for geographical exemptions and prioritizing of watershed basins. This approach is similar to other nutrient control regulations previously adopted by the Commission based on site specific demonstration of impairments to beneficial uses. The District supports this proposal to a point, in that the process of identifying priority watershed basins and critical stream segments should be accomplished prior to adoption of the Regulation. In this manner the Regulation would apply to only those priority basins and stream segments, with the rest of the State being exempt from the Regulation.

As we understand the Division's proposal, a geographical variance would be applied to certain watershed basins, however, these variances have the potential of being rescinded in the future by either the Division or EPA. If lower priority watershed basins were exempt from the Regulation, they would not be required to meet the terms of the proposed Regulation or expense of requesting a variance, or defending the need for a variance into the future.

The District believes the Division should prioritize basins under this alternative approach by considering nutrient concentrations and sources thereof, benefit to cost ratios developed in the CDM report, and the assimilative capacities of the receiving waters. The District further believes that once the Division has demonstrated that a nutrient impairment exists, they should focus on these areas that will benefit from implementation of Regulation #85. This is outlined further in the District's alternative proposal below.

## IV. ALTERNATIVE PROPOSAL

### A. Overview

The concept is to identify potential nutrient sources, identify nutrient impairments, and create a process whereby cost effective nutrient reductions can be achieved within each of the seven river basins.

Realizing that the seven major river basins cover large geographical areas having widely varying water quality and social/economic conditions, the District's proposal is to further divide the basins into smaller sub-basins that have similar water quality characteristics. Within each sub-basin, an adaptive management approach to control nutrients would be developed that provides for the protection of beneficial uses.

As part of the nutrient cost benefit analysis conducted by CDM, a similar basin approach was developed to determine the anticipated statewide costs and associated benefits of implementing the proposed regulations. The cost benefit analysis divided the State into 27 different management units (MUs) to more accurately assess the aggregate statewide costs and benefits on a regional basis.

The District's alternate proposal would build on this MU approach by utilizing the same management units identified by CDM (see Exhibits B, C, D, E, F, G, and H). Utilizing the same MUs will allow for the development of watershed management plans where costs and benefits have already been developed.

### B. Watershed Monitoring

Monitoring within each MU is the underpinning of this approach, and is the basis for developing watershed assessment models to evaluate the impacts and effectiveness of any proposed nutrient control improvements.

The development of watershed assessment models for each MU would start with a tiered monitoring effort. Engineering consultants would develop individual monitoring plans specific to the management units. The monitoring plans would be submitted to the Division for approval, as well as a proposed schedule to conduct the monitoring effort.

It is envisioned that funding from the state legislature (i.e. possible appropriations through the Department of Agriculture, a fee bill, or through CWCB or the CWRPDA) would be necessary to fund the monitoring efforts in each MU. Initially, monitoring most likely would be conducted by domestic WWTP dischargers. Any appropriation from the general legislature would be spread evenly over the seven basins, and be distributed to the specific management units based on priorities established by the Division.

Realizing that several MUs within metropolitan areas of the State may already have a significant amount of monitoring data, while other MUs within rural areas of the State have very limited data, a three tiered monitoring effort is envisioned. Tier I monitoring would consist of assembling and evaluating all available data to be entered into a general database established by the Division. Monitoring at select gauging stations would also commence to determine total stream loadings. Gauging stations at the upstream and downstream terminus ends of each MU (dependent on gauge locations) would be used as a minimum to develop an understanding of the total loading being contributed by each MU. In addition, all point source dischargers would begin nutrient effluent monitoring. Systems less than 1.0 mgd would monitor quarterly, while larger facilities would monitor monthly as a minimum. The primary goal of the Tier I effort will be to develop an understanding of the total loading from domestic WWTP point sources in comparison to the total stream loading in each MU.

Upon completion of the Tier I monitoring, a more localized strategic Tier II monitoring plan would be developed to address data gaps identified as part of the Tier I effort. The goal of the Tier II effort would be to identify potential non-point sources, as well as other potential point sources (i.e. stormwater discharges).

Tier III monitoring would subsequently follow the Tier II effort, and would be site specific to identify associated impacts and evaluate the effectiveness of any proposed improvements within an MU. The entire monitoring effort would be the basis for prioritizing improvements as well as development of the MU watershed assessment models. It is anticipated the monitoring plan could take up to 5 years to complete.

#### C. Watershed Assessment Models

Engineering consultants would develop watershed assessment models to assess the impacts and evaluate the effectiveness of any proposed improvements. The models could be developed similar to the USGS Sparrow Model, and would be based on input developed during the monitoring effort.

The watershed assessment models will also incorporate performance and expectations to reduce non-point source nutrient loadings based on criteria established by EPA and the Division in assessing paths of non-point sources (i.e., agricultural runoff) and potential implementation of stream restoration projects. The 1988 Colorado non-point source assessment report previously indicated that agricultural run-off impacted approximately 60% of the total stream miles in the State in regards to nutrient loadings. The ongoing non-point source program has identified broad requirements regarding reporting non-point source nutrient loadings, as well as restoration of impaired waters, and would be used to compliment the watershed management models for each MU.

#### D. Watershed Management Plans and Basin Prioritization

The overall cost benefit ratio developed in the CDM cost benefit report for each of the MUs would be the basis for initially prioritizing each MU on a statewide basis, and ultimately

prioritizing improvements within the seven major river basins where the most cost effective nutrient control can be achieved that realizes the maximum benefits. If sufficient data is available within high priority MU's, the control Regulation #85 would be adopted on a site specific basis.

After the initial statewide basin prioritization, engineering consultants would further develop watershed management plans for each MU. The watershed management plans would identify existing and proposed point and non-point sources, and establish effective and sustainable nutrient reduction goals. The most effective improvements (both point and non-point sources) would also be identified that accomplish the greatest nutrient reduction (i.e., largest treatment plant facility within management unit may be prioritized higher than smaller facilities). The watershed management plan would also identify high quality waters and actions necessary to maintain such waters.

The intent of the watershed management plans would be to develop action items/priorities (projects) within each MU that could be implemented to meet the nutrient reduction goals of the MU. Those prioritized projects identified would then be provided to the Division and Commission. Non-point source projects that would accomplish measurable load reductions as supported by the watershed assessment models would be prioritized in a separate non-point source project list.

Project prioritization in each MU would be detailed in the individual watershed management plans, that would then be used to prioritize projects within the entire river basin as well as on a statewide basis. The prioritization of projects would follow a similar process that is currently used by the Division in prioritizing projects for the State Revolving Loan Fund. Projects with the greatest need from a nutrient control standpoint would be assigned a Priority One, with projects showing the least benefit being assigned a Priority Five.

#### E. High Quality Waters

For those MU's that have stream segments that are determined to be high quality waters by the Division, nutrient standards would be developed so as not to degrade existing water quality. Effluent limitations for domestic WWTP discharges would be established to maintain existing water quality downstream of regulatory mixing zones, yet not be so restrictive that improvements to the facility are not feasible from either a technological or economic standpoint. This will require stream monitoring both upstream and downstream of the regulatory mixing zone as part of any permit compliance to ensure existing water quality is not degraded, and takes into account upstream variations in nutrient loadings that may occur. The goal would be to protect high quality waters in their ambient state, yet not require facilities to meet overly restrictive water quality standards that exceed beneficial uses.

F. Application to Regulations

Based on the CDM cost benefit analysis and identification of high priority and high quality waters within each MU, Regulation #85 would be adopted on a site specific basis and applied to those facilities identified as impacting beneficial uses of state waters. Effluent limits and compliance schedules would be established for each of the respective domestic WWTPs and would be included in the project eligibility list for the State Revolving Loan Fund. For the remainder of the MUs, a narrative standard would be applied to allow monitoring to be conducted (i.e., over a five year time frame).

Prior to any domestic WWTP improvements being implemented, a discharger would be allowed to demonstrate that nutrients were non impacting through biological monitoring (MMI) to establish a direct correlation between nutrient concentrations and biological impacts. Nutrient effluent limits would not apply where the discharger demonstrates there is no reasonable potential to impair beneficial use(s) based on Chlorophyll 'a' values and applicable MMI objectives. This will allow communities to make a demonstration that no actual impairment of uses is likely or projected to occur, based on site specific information. For MMI, this exception may be allowed by way of demonstrating that a low MMI score is not due to nutrient levels, but some other confounding factor such as habitat or sediment.

**EXHIBITS**

- A. Governor's Executive Order D 2011-005
- B. Colorado Nutrient Cost/Benefit Study, Arkansas Basin Figure 3-3
- C. Colorado Nutrient Cost/Benefit Study, Colorado Basin Figure 3-4
- D. Colorado Nutrient Cost/Benefit Study, Gunnison Basin Figure 3-5
- E. Colorado Nutrient Cost/Benefit Study, Platte Basin Figure 3-6
- F. Colorado Nutrient Cost/Benefit Study, Rio Grande Basin Figure 3-7
- G. Colorado Nutrient Cost/Benefit Study, Southwest Basin Figure 3-8
- H. Colorado Nutrient Cost/Benefit Study, Yampa/White Basin Figure 3-9

**WITNESSES:**

Deborah Heidel-Davis, Orchard Mesa Sanitation District Manager  
Steve LaBonde of WestWater Engineering may be called by the Orchard Mesa Sanitation District  
Ron Eddy of Sherman and Howard, LLC. may be called by the Orchard Mesa Sanitation District

Dated this 20<sup>th</sup> day of January 20, 2012

Orchard Mesa Sanitation District



Deborah Heidel-Davis, Manager  
240 27¼ Road  
Grand Junction, CO 81503

**CERTIFICATE OF MAILING**

I do hereby certify that the original and 13 copies of this Responsive Prehearing Statement of the Orchard Mesa Sanitation District was mailed, via Federal Express, to the Water Quality Control Commission at the address listed below this 20<sup>th</sup> day of January 2012.

Nancy Horan  
Water Quality Control Commission  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530

I do hereby further certify that a copy of this Prehearing Statement of the Orchard Mesa Sanitation District was emailed to the parties contained in the amended Party Status List/Mailing List.



Jill Comstock

EXHIBIT A

D 2011-005

EXECUTIVE ORDER

Establishing a Policy to Enhance the Relationship between State and Local Government  
Pursuant to the authority vested in the Office of the Governor of the State of Colorado, I, John W. Hickenlooper, Governor of the State of Colorado, hereby issue this Executive Order directing state agencies to take specific steps to enhance relations with local government.

I. Background and Purpose

For many years state government has imposed an ever-increasing number of legal requirements on local governments, without regard to the costs such requirements impose on already-strained local budgets, and without providing additional funding to enable local governments to comply. Local governments continue to face difficulties such as funding, complexity, and delay in securing flexibility and approvals regarding state requirements.

Local governments should have more flexibility to design solutions to problems without excessive interference or oversight, or unnecessary regulation, from state government. In addition, local governments should not be expected to implement laws and regulations without the funding necessary to do so. In order to assist local governments in effectively complying with such requirements, this Executive Order gives direction to state agencies on consulting and working with local governments before imposing new regulations or other obligations.

II. Directive and Scope

A. To the extent authorized by law, no state agency shall promulgate any regulation creating a mandate on local governments unless:

1. The mandate is specifically required by federal or state law;
2. The agency consults with local governments prior to promulgation of the regulation; and
3. The state government provides the funding necessary to pay for the direct costs incurred by local governments in complying with the mandate.

B. Each agency, prior to the formal promulgation of regulations containing the proposed mandate, shall provide to the Director of the Governor's Office of State Planning and Budgeting a description of the nature and extent of the agency's consultation with representatives of the local governments that would be affected by the proposed mandate, the nature of their concerns, any written communications or comments submitted to the agency by such units of local government, and the agency's reasoning supporting the need to issue the regulation containing the mandate.

C. Each agency shall develop a process to actively solicit the meaningful and timely input of elected officials and other representatives of local governments into the development of regulatory proposals affecting local government. Each agency shall implement its process as soon as practicable and post the process on its website.

D. Each agency that is permitted by law to grant temporary or permanent waivers of statutory or regulatory requirements shall adopt rules for granting waivers if a local government can demonstrate that the requirements conflict with other regulations or statutes, or are unduly burdensome. Each State agency shall prepare and publish on its website a policy describing the circumstances in which temporary or permanent waivers will be granted, and the criteria required for obtaining a waiver.

E. Each agency shall consider any application by a local government for a waiver of statutory or regulatory requirements in light of the goal of increasing opportunities for local governments to exercise flexibility in seeking to comply with statutory or regulatory requirements.

F. To the fullest extent practicable and as permitted by law, each agency shall render a decision on an application for waiver within 90 days of receipt of such application by the agency. If the application for waiver is not granted, the agency shall provide the applicant local government with timely written notice of its decision and the reasons for its decision.

G. The executive director of each agency shall be responsible for ensuring implementation of, and compliance with, this Executive Order.

H. Executive agency means any authority of the State of Colorado that is an "agency" pursuant to C.R.S. § 24-3-101.

### III. No Creation of Rights

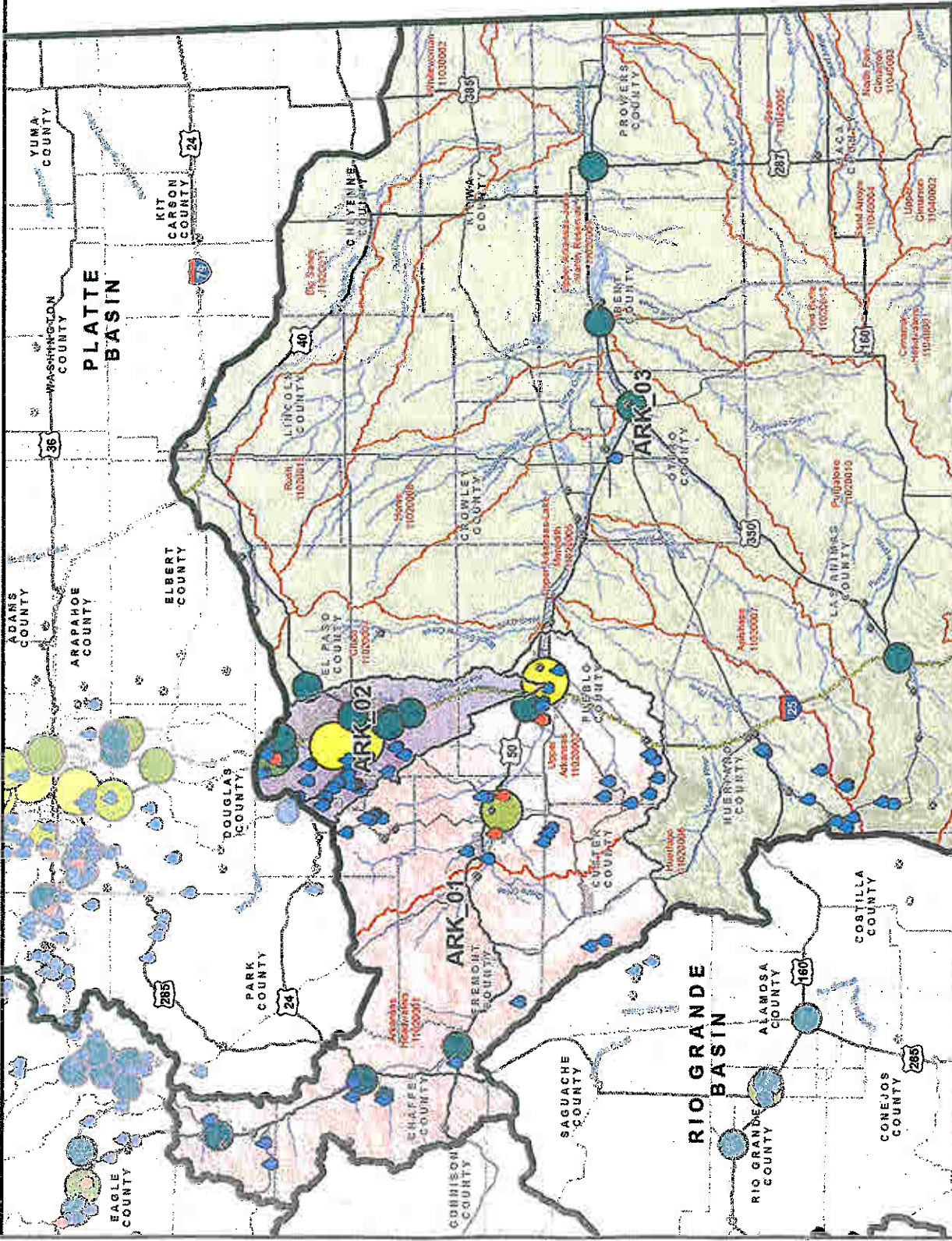
This Executive Order is intended only to improve intergovernmental operations, and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by any party against the State of Colorado, its agencies, officers, employees, or any other person. This Executive Order shall not be used as a basis for legal challenge to statutes, regulations, or other actions or to any inaction of any state agency subject to it.

### IV. Duration

This Executive Order shall remain in full force and effect until modified or rescinded by future Executive Order of the Governor. This Executive Order supersedes Executive Order D 0007 94.

GIVEN under my hand and the  
Executive Seal of the State of  
Colorado this eleventh day of  
January, 2011.  
John W. Hickenlooper, Governor

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**WWTF - Flow**

- Domestic
- Non-Domestic

Exempt Facility

>0.5 - 1 mgd

1 - 3 mgd

3 - 5 mgd

5 - 10 mgd

>10 mgd

Water Supply Facility

Water Supply Facility w/  
Source Water Concerns

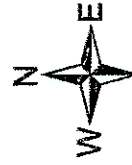
Stream / River

Waterbody

HUC8 Boundary

Municipality

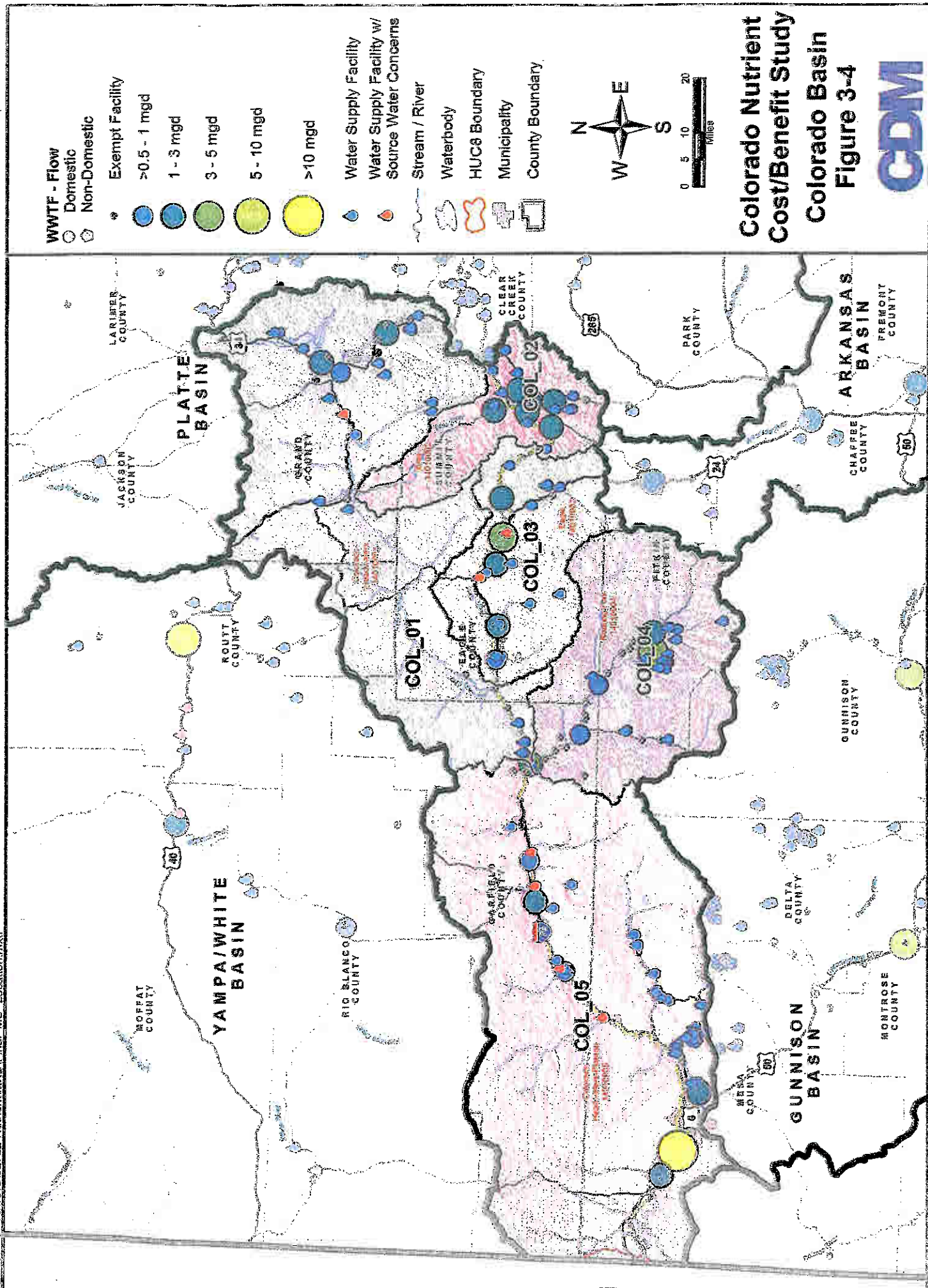
County Boundary



**Colorado Nutrient  
Cost/Benefit Study**

**Arkansas Basin  
Figure 3-3**





- WWTF - Flow
  - Domestic
  - Non-Domestic
- ★ Exempt Facility
- >0.5 - 1 mgd
- 1 - 3 mgd
- 3 - 5 mgd
- 5 - 10 mgd
- >10 mgd
- Water Supply Facility
- Water Supply Facility w/ Source Water Concerns
- ~ Stream / River
- ~ Waterbody
- ~ HUC8 Boundary
- ~ Municipality
- ~ County Boundary

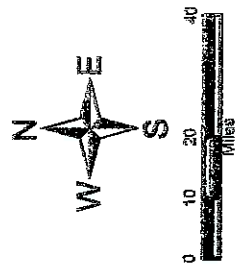


**Colorado Nutrient Cost/Benefit Study**  
**Colorado Basin Figure 3-4**

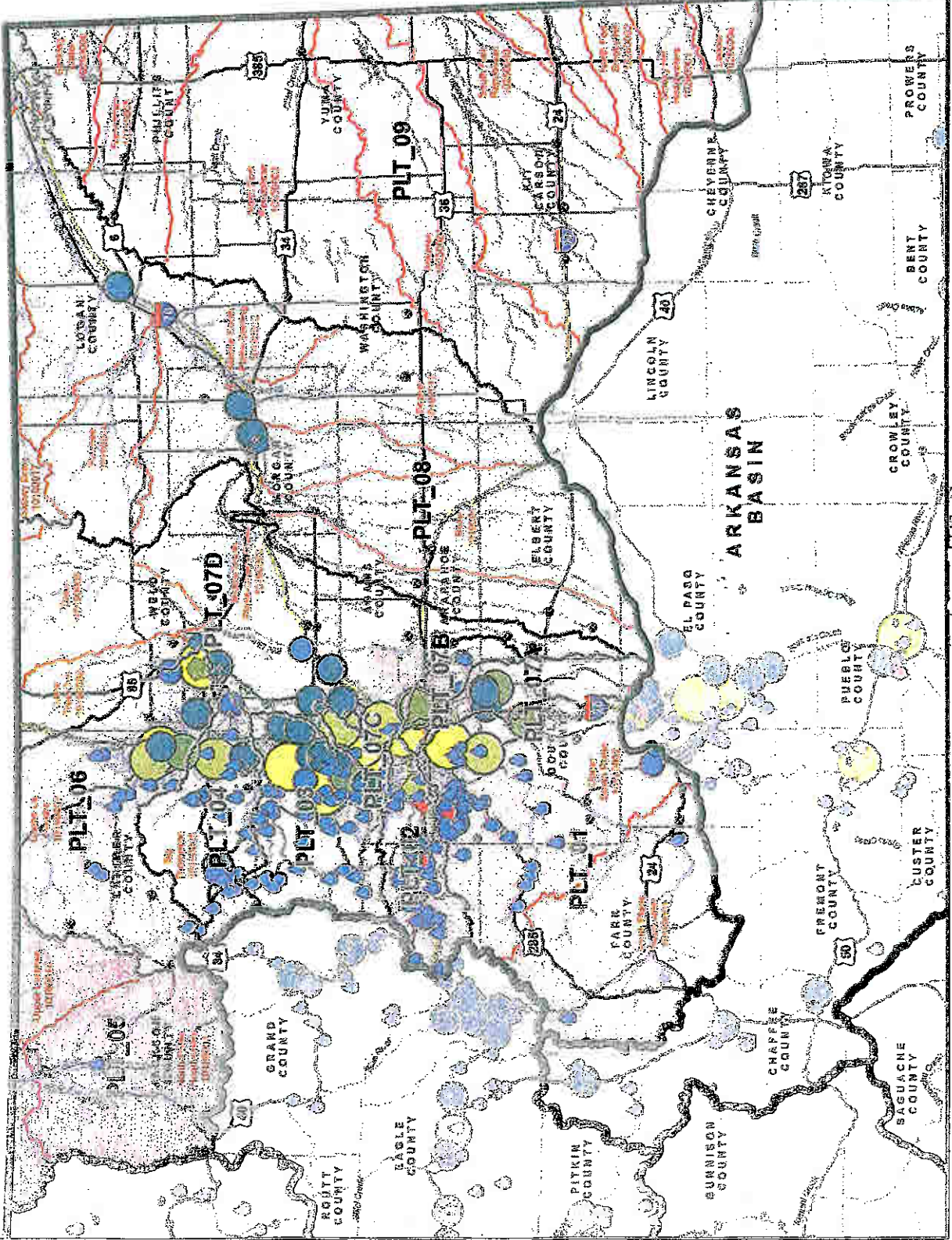


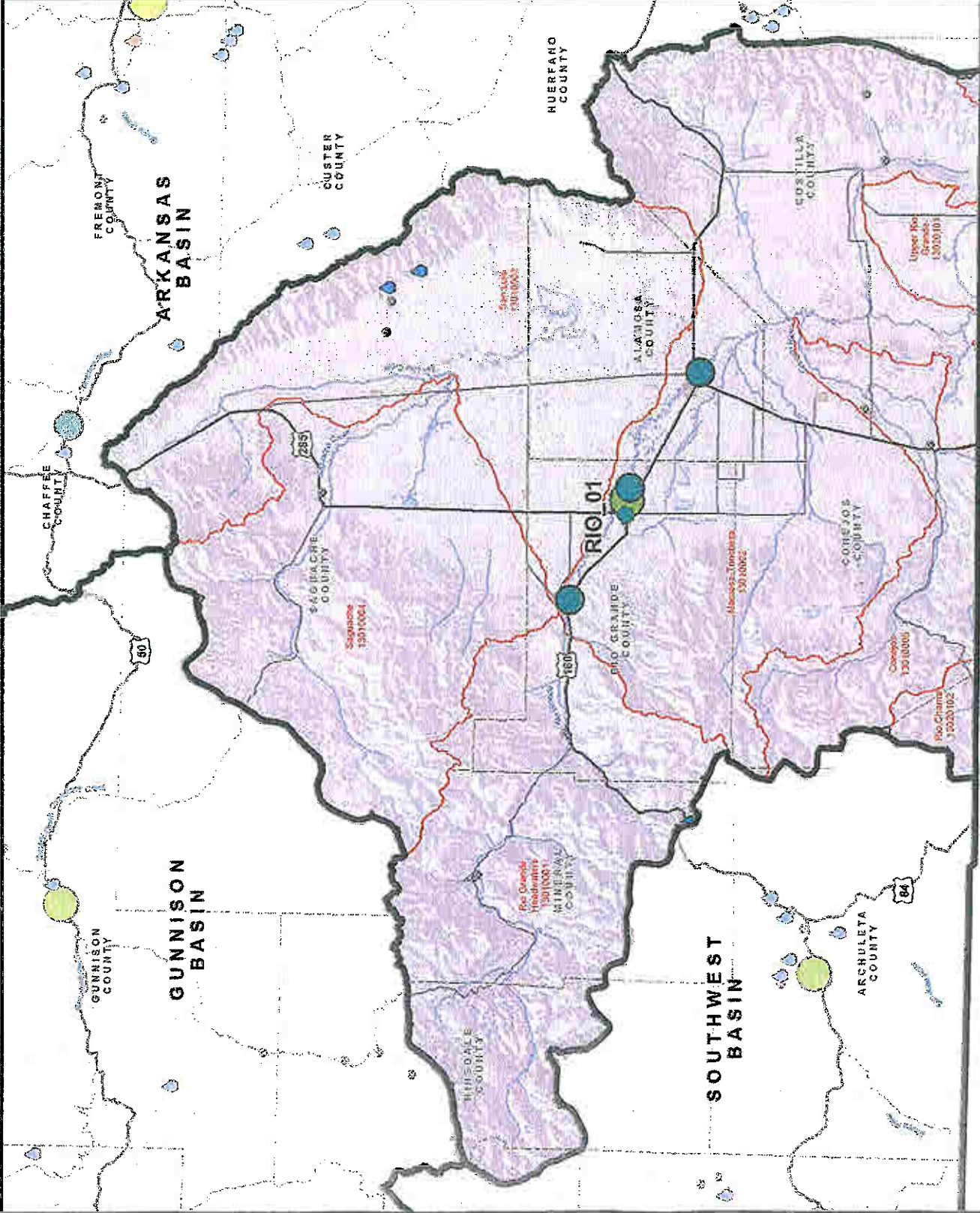


- WWTF - Flow
  - Domestic
  - Non-Domestic
- ★ Exempt Facility
- >0.5 - 1 mgd
- 1 - 3 mgd
- 3 - 5 mgd
- 5 - 10 mgd
- >10 mgd
- Water Supply Facility
- Water Supply Facility w/ Source Water Concerns
- Stream / River
- Waterbody
- HUC6 Boundary
- Municipality
- County Boundary

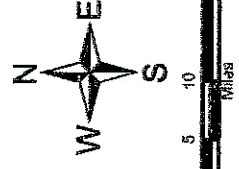


**Colorado Nutrient Cost/Benefit Study**  
**Platte Basin**  
**Figure 3-6**





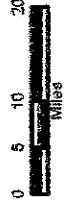
- WWTF - Flow**
- Domestic
  - Non-Domestic
  - Exempt Facility
  - >0.5 - 1 mgd
  - 1 - 3 mgd
  - 3 - 5 mgd
  - 5 - 10 mgd
  - >10 mgd
- Water Supply Facility
- Water Supply Facility w/ Source Water Concerns
- Stream / River
- Waterbody
- HUC8 Boundary
- Municipality
- County Boundary



**Colorado Nutrient Cost/Benefit Study**  
**Rio Grande Basin**  
**Figure 3-7**



- WWTF - Flow**
- Domestic
- Non-Domestic
- Exempt Facility
- >0.5 - 1 mgd
- 1 - 3 mgd
- 3 - 5 mgd
- 5 - 10 mgd
- >10 mgd
- Water Supply Facility
- Water Supply Facility w/ Source Water Concerns
- Stream / River
- Waterbody
- HUC8 Boundary
- Municipality
- County Boundary



# Colorado Nutrient Cost/Benefit Study Southwest Basin Figure 3-8

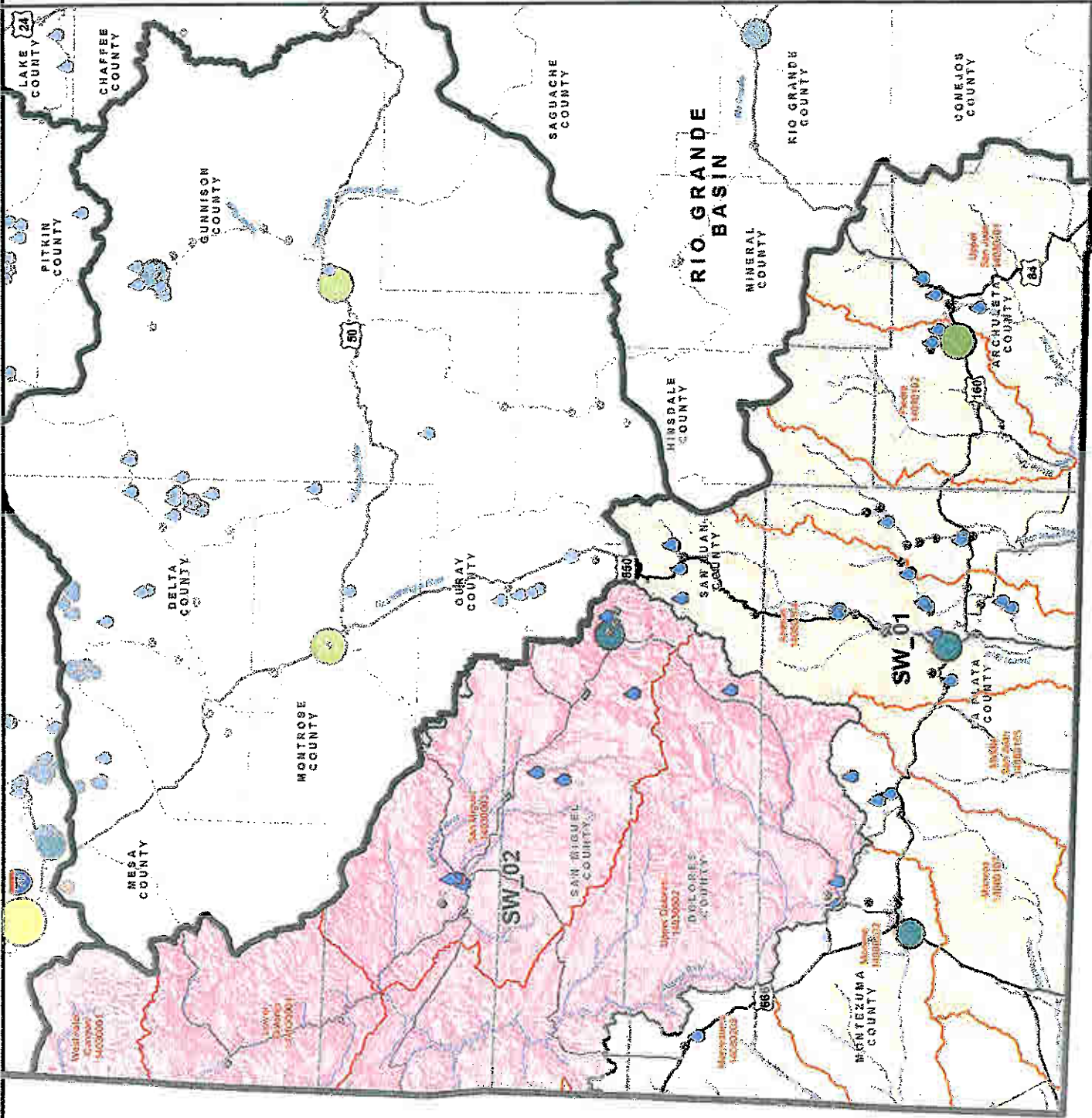
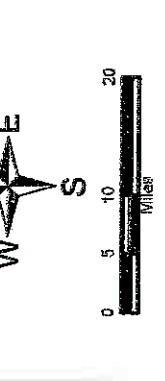


EXHIBIT G

- WWTF - Flow**
- Domestic
  - ◻ Non-Domestic
- Exempt Facility**
- >0.5 - 1 mgd
  - 1 - 3 mgd
  - 3 - 5 mgd
  - 5 - 10 mgd
  - >10 mgd
- Water Supply Facility**
- Water Supply Facility w/ Source Water Concerns
- Stream / River**
- Waterbody
- HUC8 Boundary**
- Municipality
  - County Boundary



**Colorado Nutrient Cost/Benefit Study**  
**Yampa/White Basin**  
**Figure 3-9**

