APPENDIX D

Table of Preliminary List of Issues to be Addressed in the 10-Year Review
Subject: Preliminary List of Issues to be Considered in the 10-Year Review of the Operating Principles for the Trinidad Dam and Reservoir Project

Dear Interested Parties:

In a letter dated March 3, 2005, the Bureau of Reclamation requested that comments be submitted for consideration in the upcoming 10-year review of the Operating Principles for the Trinidad Dam and Reservoir Project (Project). Comments were received from the State of Colorado (Colorado), the State of Kansas (Kansas); and the Purgatoire River Water Conservancy District (District).

An informational meeting was held in Trinidad, Colorado on October 5, 2005, to present the comments received, and to provide additional information regarding the review process. Reclamation made follow-up phone calls with Kansas, Colorado, and the District to gain a further understanding of the issues that these parties presented.

On February 22, 2006, Reclamation held a technical meeting in Denver, Colorado, to examine the details of the proposed issues. At the meeting Reclamation provided a list of issues compiled from the submitted written comments and follow-up phone calls. Representatives from the District, Colorado, Kansas, the City of Trinidad, U.S. Army Corps of Engineers (COE), and The Nature Conservancy were in attendance. In the enclosed table is a preliminary list of issues that has been compiled for consideration and further review by Reclamation based on the discussions during the meeting.

Two Issue Items that will not be considered in this 10-year review process are as follows (the issue item numbers refer to the topics listed in the enclosed table):

1. Issue Item 11, rate secondary gage below Trinidad Reservoir. This has been identified as a COE issue, which will be addressed in a different venue.

2. Issue Item 14, status and utilization of the Model Reservoir. Colorado has agreed to provide information to Kansas on status and utilization of reservoirs.
The remainder of identified issues will be considered in the 10-year review. Several of these issues involve common themes, and are being consolidated for further consideration in the 10-year review process.

**The preliminary list of issues that will receive consideration are as follows:**

1. **Water Measurement and Gaging**
   a. Document that the U.S. Geological Survey (Survey) Loss Study was completed.
   b. Compile a list of historic gages for the Project, including documenting their respective period of records, locations, and tracking the different names that were used.
   c. Document that the COE and Reclamation began sharing the cost of operation and maintenance of the Survey operated Purgatoire River at Thatcher Gage.
   d. Convene an ad-hoc technical team to examine which gages are needed for the Project.

2. **Acreage Verification**
   a. Document what has been done to improve the tracking of Project acreage.
   b. Identify procedural improvements needed to ensure compliance with the Operating Principles.
   c. Have discussions regarding standardizing the data for the Geographic Information Systems product currently under development by the District.

3. **Document current and historic practices, and identify procedural improvements needed to ensure compliance with the Operating Principles for the following existing uses of Project water:**
   a. Stock Water Releases
   b. Permanent Fish Pool including both the enlargement of the fish pool, and approval of Model water by State Parks
   c. City of Trinidad use of Municipal and Industrial water.

4. **Modeling review and verification**
   b. Review 1964 and 1988 models to see if current operations are modeled adequately.
c. Review data being collected to ensure that it is the correct data needed for future modeling.

d. Using the existing model, analyze the impacts from storing direct flows in the irrigation capacity during the non-irrigation season (Winter Water). Determine to the extent possible, if the results modeled adequately represent the operation and impacts.

5. Flood Control Operations of Trinidad Dam and Reservoir

a. Provide copies of documents in the report from April 16, 1993, and December 2, 1998, letters between COE and Reclamation that established the maximum non-damaging flows from the dam to be 3,000 cfs.

b. Obtain a new letter from the COE documenting the current maximum non-damaging flow capacity.

Comments regarding this preliminary list will be accepted until May 31, 2006, at which time a final list of issues will be distributed. I will provide updates, as they become available. Notification will be sent for meetings that are arranged to collect and present information regarding these issues.

If you have any questions, or to discuss these items in more detail, please email me at jgould@gp.usbr.gov, or call me at 970-962-4338.

Sincerely,

Jaci Gould

Jaci Gould
Manager, Resource Division

Enclosure -1

bc: 85-6000 (Vehmas) (w/encl)
EC-1320 (Wilson, Harlan) (w/encl to each)
<table>
<thead>
<tr>
<th>Item Issue</th>
<th>Agency</th>
<th>Letter</th>
<th>Phone</th>
<th>Comments</th>
<th>Not included in 2006 Review</th>
<th>Includes in 2006 Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Look at which gages should continue to operate, and who should pay.</td>
<td>Colorado</td>
<td>L-2</td>
<td></td>
<td></td>
<td></td>
<td>Identify what gages are needed to assess project impacts.</td>
</tr>
<tr>
<td>1a Purgatoire River at Thatcher gage aka: below Von Bremmer Arroya gage</td>
<td>Colorado</td>
<td>L-2</td>
<td></td>
<td></td>
<td></td>
<td>Document this in the review.</td>
</tr>
<tr>
<td>1b Purgatoire River on Von Bremmer Arroya gage</td>
<td>Colorado</td>
<td>L-2</td>
<td></td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>1c Luling Arroya gage</td>
<td>Colorado</td>
<td>L-2</td>
<td></td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>2. USGS loss report</td>
<td>Colorado</td>
<td>P-2</td>
<td></td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>3. Future Modeling and associated data needs</td>
<td>Colorado</td>
<td>P-2</td>
<td></td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>4. Acreage verification</td>
<td>Colorado</td>
<td>P-2</td>
<td></td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>5. Stock Water Releases</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>6. Acreage Verification</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>7. Permanent Fish Pool Enlargement of fish pool approval of Model water by State Parks</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td></td>
<td></td>
<td>Does BoR use this gage for 10-year review?</td>
</tr>
<tr>
<td>Item</td>
<td>Issue</td>
<td>Agency</td>
<td>Letter</td>
<td>Phone</td>
<td>Comments</td>
<td>Not Included in 2006 Review</td>
</tr>
<tr>
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</tr>
<tr>
<td>8</td>
<td>Modeling in general</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>Look at data being collected, to see that it is the right data needed for future modeling.</td>
<td>Perform analysis of past project operations using the 1964 model. Determine if 1964 model can be used to evaluate future changes. Provide good description of 1964 model. What it does, and does not do, what assumptions are made, and compare with how the Project operates.</td>
</tr>
<tr>
<td>9</td>
<td>Progress toward efficient application of available irrigation supply</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>Issue is related to gaging, acreage verification, and model review.</td>
<td>Document in review.</td>
</tr>
<tr>
<td>11</td>
<td>Rate secondary gage below Trinidad Reservoir</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>CoE maintains these gages for flood operations: Flows under 1,000 cfs, inverted bucket. Gage for flows over 1,000 cfs needs to be calibrated.</td>
<td>CoE action outside of 10-year review.</td>
</tr>
<tr>
<td>12</td>
<td>Hydrologic impacts of M&amp;A water</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td></td>
<td>See issue number 8 comments.</td>
</tr>
<tr>
<td>13</td>
<td>Create a document to track changes to OP, not historically but from this point on.</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td></td>
<td>BoR will maintain track changes document if the OP are amended.</td>
</tr>
<tr>
<td>14</td>
<td>Status and utilization of Model Reservoir.</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>Is there any storage allocation left at the Model reservoir site?</td>
<td>Not part of project, outside of 10-year review.</td>
</tr>
<tr>
<td>15</td>
<td>Hydraulic impacts of lands removed from irrigation</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>Verify with Colorado, but don't think there are any.</td>
<td>Co signed to get info to KS. See issue number 8 comments.</td>
</tr>
<tr>
<td>16</td>
<td>Requested that the modeling period be 1979 to present.</td>
<td>Kansas</td>
<td>L-1</td>
<td>P-1</td>
<td>The modeling period is not being examined in this review process.</td>
<td>General comment noted.</td>
</tr>
</tbody>
</table>
## Trinidad Dam and Reservoir Project
### Preliminary List of Issues for the 2006 Review of the Project Operating Principles

<table>
<thead>
<tr>
<th>Item</th>
<th>Issue</th>
<th>Agency</th>
<th>Letter</th>
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<th>Include in 2006 Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Winter water: Analyze the impacts, if any, of storing direct flows in the irrigation capacity during the non-irrigation season.</td>
<td>PRWCD</td>
<td>L-3</td>
<td>P-1</td>
<td>Examine possibility of amending the OP, if needed. Develop model to analyze project depletions. PRWCD thinks this is covered under the current Operating Principles.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Letters

- **L-1** April 14, 2005, from David Pope, Chief Engineer, State of Kansas.
- **L-2** April 15, 2005, from Hal Simpson, State Engineer, State of Colorado.
- **L-3** October 5, 2005, from Julianne Woodridge, PRWCD.

### Conversations

- **P-1** Jan 25, 2006 w/ Kevin Salter, Dave Barfield, David Pope to provide clarification on Kansas’ letter of April 14, 2005.
- **P-2** January 31, 2006 w/ Steve Miller and Carol Angel to provide clarification on Colorado’s letter of April 15, 2005.
- **P-3** February 21, 2006 w/ Julianne Woodridge representing PRWCD to provide clarification on letter October 5, 2005.
Jaci,  
In your letter dated April 27, you provided a preliminary list of issues to be considered in the 10-year review of the operating principles for the Trinidad Dam and Reservoir Project. Below are Kansas comments on the listing.  
First, you note that USBR will not review two issues including the "status and utilization of Model Reservoir." To the extent this water right has been used in the past review period or might be used in the future, we believe the issue is pertinent to the 10-year review. We will follow-up with the promise of the State of Colorado to provide information on this issue and determine the potential for it to be an issue of concern.  
The draft listing of issues appears to commit the Bureau's 10-year review to documenting past and current operations and their compliance with the Operating Procedures. However, it is not clear to what extent the 10-year review will review the impact of these operations on the State of Kansas and other entities as we believe is envisioned in condition four of Kansas' five conditions, which says in part "... the Operating Principles be reviewed to determine the effect, if any, the operation has had on other Colorado and Kansas water users ..." More specific comments follow.  
Under "3. Document current and historical practices, ....."  
* The Operating Principles require the District to limit use during the irrigation season to that needed to meet irrigation requirements as determined by the District. Your letter notes that the U.S.G.S has conducted a transit loss study, however, how will the results of the transit loss study be used by the District to meet this requirement? Has the District made any progress on the Recommendations F & G of the 1985 - 1994 10-year review related to this issue?  
* For the three issues listed, USBR needs to review these items in line with the Comments included in the attached Table to the 27 April letter and with Kansas' condition 4.  
Under "4. Modeling review and verification"  
* Please provide clarification of what USBR are going to do with the 1964 & 1988 models. Just how will these models be utilized in this review? As is noted above, we believe the Bureau has an obligation in this review to analyze the impacts of project operations to the best of its ability.  
Under "5. Flood control operations of Trinidad Dam and Reservoir"  
* This issue goes to Kansas condition 1 of the five conditions. If river channel conditions have degraded such that the maximum flood releases are reduced, then the issue of flood flow regulation needs to be reviewed for compliance with the Operating Principles. The two issues listed under this heading seem to document current status rather than review for compliance with the Operating Principles. The concern for downstream users is that limiting flood flow releases changes the hydrologic conditions downstream from the project, and may affect Compact conservation storage in John Martin Reservoir.  
Finally, it was recognized that a method of tracking changes to the Operating Principles was needed. A statement of how changes will be tracked should be included in this ten-year review.