



COLORADO

Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

August 7, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

E-filed at FERC Online by the Colorado Water Quality Control Division

Re: Peabody Trout Creek Reservoir Project FERC Project No. P-144446

Thank you for the opportunity to comment on the results presented at the Second Study Report Meeting held on June 25, 2015. It is challenging for us to attend all the project meetings and site visits as we are in the middle of our summer field season and currently preparing for our proposal for the 2016 303(d) List of the impaired waters of Colorado. The following comments were developed in response to the Second Meeting Report and presentation slides.

It is recommended that water quality be collected and analyzed using the same fraction (dissolved or total recoverable dependent on the standard) as the Water Quality Control Commission (WQCC) standards found in Regulation No. 33 for the impacted segments in the Yampa River basin. This is very important for the eventual submittal of information for the 401 Water Quality Certification. Generally the most restrictive standards are for the protection of aquatic life. Since all of segments impacted by the proposed project have an aquatic life use it is important that water quality data be collected and assessed against the aquatic life standards. Colorado's water quality metal standards to protect aquatic life are for the dissolved parameter and in some cases both dissolved and total recoverable. By collecting and analyzing for only total recoverable metals it is not possible to accurately evaluate attainment of dissolved metals water quality standards. We also recommend the collection of hardness information which is required for calculation of most metals table value standards. Parameters used to evaluate attainment are found in each segment of the regulation. Please feel free to contact me if you need a list of monitoring parameters that are relevant for our assessment of these segments.

The Water Quality Control Division (division) is pleased to see that stream temperature and dissolved oxygen are being continuously monitored and recorded. Interval data from stream temperature dataloggers such as ones deployed on Trout Creek, Middle Creek and Fish Creek is very important in determining stream attainment and baseline conditions. We would hope that you will share your data with us in a timely manner and in a standardized format.

Annually the division sends out a "data call" to collect water quality data from data collectors across the state. This information is used by the division to review water quality standards during basin rulemaking hearings and for the development of Colorado's list of impaired waters (Regulation No. 93). It is recommended that you submit your project data to the division during the annual data call. This will help in identifying gaps where additional information is needed for certification review.

To get on the data call email list please contact Nancy Horan (nancy.horan@state.co.us) with the Water Quality Control Commission and express interest in Regulations No. 33 and 93 or Sarah Wheeler (sarah.wheeler@state.co.us) with the division.

If you have any questions, please don't hesitate to contact me.

Sincerely,
John Hranac
Water Quality Control Division
Colorado Department of Public Health and Environment

