



July 18, 2010

To: Colorado Water Conservation Board

From: Save the Poudre: Poudre Waterkeeper (STP)

RE: The Halligan-Seaman Shared Vision Planning Process

Dear CWCB,

Many months ago you awarded a grant to the Halligan-Seaman Shared Vision Planning Process. That grant required a report from the project applicants, which was recently sent to you. Save the Poudre was a participant in the H-S SVP process and recently had the opportunity to review the report. We'd like to offer our input on the H-S SVP process and the report.

1. STP objected to the several parts of the SVP process. Despite our repeated requests, the H-S SVP applicants refused to use the process to address our concerns – to study the impacts of removed peak flows from the North Fork and the Mainstem of the Poudre River, and to study all alternatives in the EIS process rather than just the “preferred alternative” of the applicants. Additionally, now that the SVP process has been completed, and the results will be folded into the EIS process, we will be insisting that all alternatives in the EIS receive equal scientific and public rigor as did the preferred alternative through the SVP process.

2. The SVP report sent to you by the applicants expresses the opinions of the authors and does not express the opinions of the participants in the SVP process including Save the Poudre: Poudre Waterkeeper. The report contains many statements that we do not agree with, and contains numerous “errors of omission” where the negative impacts of the applicants’ preferred alternative are repeatedly ignored. Specifically, the proposed Halligan and Seaman Reservoirs would cause extraordinary environmental damage to the Poudre River (North Fork and mainstem). At a minimum, the proposed Halligan-Seaman projects would:

- Build 2 new larger in-channel dams blocking the North Fork of the Poudre River.
- Flood and destroy 6.2 miles of pristine canyon of the North Fork of the Poudre River.
- Flood and destroy 3 miles of designated “critical habitat” for the Preble’s Meadow Jumping Mouse, a federally listed endangered species under the Endangered Species Act.
- Remove even more peak flows from the already severely degraded North Fork of the Poudre River.
- Build a new diversion structure and pumping station in the mainstem of the Poudre River.

- Remove even more peak flows from the already severely degraded mainstem of the Poudre River through Fort Collins and out to the confluence with the South Platte which could:
 - Negatively impact water quality
 - Negatively impact riparian areas, fish habitat, and natural areas habitat
 - Negatively impact the economy of downtown Fort Collins
 - Potentially cause flooding and stormwater concerns through Fort Collins due to channel siltation
 - Impact the viability of the Whitewater/kayak park in downtown Fort Collins

3. As Save the Poudre has stated publicly in SVP meetings, if the applicants choose to move forward with their dam/reservoir proposals, we are requesting that a “full-blown SVP” process be used that opens up the entire EIS process to Shared Vision Planning. Such a full-blown SVP process would be an all-inclusive, cooperative, and transparent stakeholder process that would more likely:

- Provide water supply security to the cities of Fort Collins and Greeley.
- Reduce the cost and time of permitting.
- Improve government accountability and transparency in the public’s eye.
- Improve stakeholder involvement and reduce conflict.
- Provide alternatives that the traditional permitting process may overlook.
- Protect the Poudre River.

4. If the applicants move forward with any other version of SVP like a mitigation scenario that assumes dams and reservoirs will be built, or involves mitigation with NISP, Save the Poudre will very likely not participate in that SVP process. If the State of Colorado chooses to award any additional grants to the Halligan-Seaman applicants, and those grants pay for processes that do not reflect the input of key stakeholders such as Save the Poudre, those grants may not be successful in achieving their goals.

Thank you very much for considering our comments. Please don’t hesitate to contact me with any questions or concerns.

Respectfully,



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p.s. Attached (below) is an “alternatives” document for Halligan and Seaman supported by Save the Poudre.



Alternatives to the Proposed new Halligan and Seaman Reservoirs

July 18, 2010

This is a “working document” from Save The Poudre: Poudre Waterkeeper. It is meant to stimulate discussion in the Halligan/Seaman SVP and EIS processes. Save The Poudre has not yet taken a position for or against these two projects, but is actively promoting alternatives that are less environmentally damaging.

1. A much larger investment in water conservation and efficiency, especially xeriscaping.
2. Water sharing and leasing (including dry year leasing) with other agricultural and municipal users.
3. Agricultural transfers of already firmed water.
4. Buying water from different sources such as “senior direct flow rights” or already “firmed water.”
5. Changing the policies to require developers to turn over “better” water to the cities as new growth occurs – that “better” water would be more senior, be direct flow rights, or be water that is already firmed up.
6. Changing the cities’ drought policies.
7. Using irrigated lawns as drought protection – during severe droughts, lawn water could be used for essential needs rather than for aesthetic purposes.
8. Water exchanges and trades (upstream and downstream, and with other users).
9. Storing Fort Collins’ and Greeley’s large surplus water supply in existing reservoirs or gravel pits.
10. Building new gravel pit storage.
11. Changing the “safety factor” or using other water sources (such as the irrigation water required for lawns) as the safety factor.
12. Having the cities’ “system vulnerability” and “redundancy factor” be equivalent to other Front Range cities.
13. Aquifer storage – the State of Colorado has determined that up to 291,000 acre of aquifer storage exist in the Cache la Poudre basin.
14. Increasing the carryover capacity allowed in the C-BT system.
15. Adopting aggressive “smart growth” policies that promote infill and redevelopment rather than sprawl, and thus require significantly less water for new population growth.

Specific Alternative to Seaman (in addition to the alternatives above): Building water storage out on the plains near Greeley that diverts water from the Poudre or South Platte right beside Greeley, instead of building new storage in Poudre Canyon and diverting water upstream of Fort Collins.