



March 16, 2011

Mr. Chandler Peter
US Army Corps of Engineers
Denver Regulatory Office
9307 South Wadsworth Blvd.
Littleton, CO 80123

Dear Mr. Peter:

On behalf of Save The Poudre: Poudre Waterkeeper, I enclose a copy of a report titled "Water Supply Impacts of the Northern Integrated Supply Project (NISP), December 1, 2010," with its two appendices. This report was prepared for Save the Poudre by a consulting firm, Canyon Water Resources, LLC, out of Glenwood Springs, Colorado. We send this independent report to you because we believe it has direct bearing on the analysis you are conducting for the Supplemental NISP DEIS. The report's conclusions, and their ramifications, must be thoroughly addressed in the Supplemental to comply with the Clean Water Act and the National Environmental Policy Act.

To summarize the relevant, objective scientific conclusions from this report, if NISP were constructed in a manner similar to that outlined in the DEIS:

- NISP diversions into Glade Reservoir would diminish stream flows and water supplies available to existing users holding absolute water rights along both the Cache la Poudre and South Platte Rivers;
- These existing water users cover the full spectrum of water rights holders, namely approximately 79 river diverters, approximately 54 reservoir storage rights totaling about 26,000 acre-feet of storage, and approximately 280 well water rights;
- A review of the State of Colorado's database of call records affecting District 3 for the period May 2000 - November 2009 shows that since May 2000 and during the months of May – July, there have been only 66 days when the records indicate that the Glade Reservoir storage right would have been in priority.

The ramifications of these conclusions will be significant in adequately preparing the Supplemental NISP DEIS because:

- It is clear that NISP would remove water from a large number of existing agricultural (and other) users, counter to the claims from the Northern Colorado Water Conservancy District.

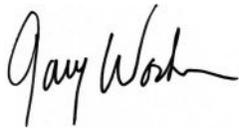
- Given the large number of junior rights holders that would see water use curtailed if NISP were constructed, diminished agricultural productivity -- with attendant negative economic impacts -- would be inevitable and must be factored in to the proposed project costs in the NEPA analysis.
- Similarly, if existing water use on these existing farms and ranches were curtailed, there would be attendant reductions in water that supports the maintenance of existing wetlands, both riparian and non-riparian, a critical element to be covered because of the Clean Water Act.
- The small number of days that Glade could have been in priority casts serious doubt on the suggested firm yield of NISP achieved solely through the exercise of the Grey Mountain and South Platte water rights. The Supplemental DEIS must more directly explore the widespread consequences from the proposed "operational flexibility" (water trades with cities and farmers, leases of existing senior water rights from cities and farmers, etc.) that would be necessary to achieve the projected firm yield, including impacts to the river environment, recreation, water quality, and so on, under both the Clean Water Act and NEPA.

Should you have any technical questions specific to this report, please direct them to Save the Poudre's boardmember, John Bartholow, 970-223-6488.

Thank you for the opportunity to provide input and make requests of your office regarding the environmental and economic impacts to northern Colorado of the proposed Northern Integrated Supply Project. Your organization and ours mandates objective, scientifically valid information to thoroughly comply with the letter and spirit of existing national and state laws. *Please acknowledge receipt of this letter.*

We are also involved in gathering additional information relevant to a variety of subjects and will be forwarding those summary reports to you as they become available.

Respectfully,



Gary Wockner, PhD, Director,
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