



March 28, 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 “The Farm Facts About NISP: If Built, the Northern Integrated Supply Project Would Severely Impact Agriculture in Northern Colorado.” (dated March 15, 2011) This report was prepared by Save the Poudre. We send this report to you because we believe it has direct bearing on the analysis you are conducting for the NISP Supplemental DEIS (SDEIS). The report’s conclusions, and their ramifications, must be thoroughly addressed in the SDEIS 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 would accelerate the buy-up and subdivision of farm land in northern Colorado (and potentially on the Western Slope) with negative impacts on up to 123,000 acres of irrigated farmland, including:

- 48,000 acres of agricultural dry-up due to sprawling subdivisions – because most of the NISP communities proposed to fund NISP with debt, this ag dry-up will likely occur even faster than would otherwise occur if NISP is not built.
- 3,000 acres of irrigated land on salt-sensitive soils would go permanently out of production or have permanent productivity losses due to increased salt burden in the soil – the South Platte Water Conservation Project portion of NISP and its Galeton Reservoir would force lower crop yields upon irrigated farmland receiving water from Galeton.
- 11,000 acres on the lower Poudre and South Platte would be permanently lost due to loss of “free river” water – NISP “free river” and “junior rights” water is currently being used by farmers in the South Platte basin including a full spectrum of water rights holders. These users include 79 river diverters, approximately 54 reservoir storage rights totaling about 26,000 acre-feet of storage, and approximately 280 well water rights.

- 5,000 acres eliminated due to reservoir construction – Glade and Galeton reservoirs will submerge productive farm land.
- 56,000 acres potentially dried up (temporary and/or long-term) due to the “Initial Fill” and “operational flexibility” needed to keep Glade and Galeton reservoirs operational – agricultural water in both the South Platte and Colorado River basin can be used at any time to fill Glade and Galeton, and to keep both reservoirs operational.

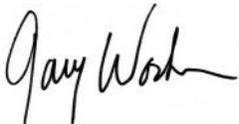
The ramifications of these conclusions will be significant in adequately preparing the Supplemental NISP DEIS because:

- It is clear that NISP would dry up farm land and remove water from a large number of existing agricultural (and other) users, counter to the claims from the Northern Colorado Water Conservancy District. This ag dry-up must be analyzed in the SDEIS.
- NISP communities’ population growth plans and debt-funded financing structure for NISP will require them to consume farm land and farm water faster than normal in order to meet finance obligations. The impact of population growth and debt financing on farm land must be analyzed in the NISP DEIS.
- The attendant economic impacts to the agricultural economy caused by all of this agricultural dry up in the Poudre, South Platte, and Colorado River basins if NISP were built must be analyzed in the NISP SDEIS.
- 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. These wetland impacts must be analyzed in the NISP SDEIS.

Should you have any technical questions specific to this report, please direct them to Gary Wockner, 970-218-8310.

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 and “The Farm Facts About NISP.”*

Respectfully,



Gary Wockner, PhD, Director,
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