



April 9, 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, "Fort Collins Whitewater Park Economic Assessment, February 7, 2011." Also enclosed is a copy of a letter from Aaron K. Asquith, P.E., Principal, McLaughlin Whitewater Design Group, to the City of Fort Collins, RE: Whitewater Park Impacts from Reduced Flows in the Poudre River, September 3, 2008. The report, "Fort Collins Whitewater Park Economic Assessment," was prepared for Save the Poudre by Dr. John Loomis, Professor, Agricultural and Resource Economics, Colorado State University, Fort Collins, 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.

First, a brief background. In recent years, throughout the west, communities have been developing whitewater parks at a brisk pace. In Colorado alone there are at least 26 such parks, a quarter of the country's total, with several more currently on the drawing board. There are two primary reasons for this trend. First, these parks provide wonderful recreational opportunities for river enthusiasts including tubers, rafters, kayakers, and spectators. Second, they have proven to be significant economic engines for their communities. For example, the City of Golden, CO, built their park in 1996 for \$165,000. Studies estimate the park contributes \$1.4 million to their annual economy. The Golden park was also precedent-setting when in 2001 Golden won a decision from the Colorado Supreme Court guaranteeing minimum flows for its park. The Recreational In-Channel Diversion (RICD) the city received established for the first time that recreation is as beneficial a use of water as agriculture, industry and development. As important as these parks' financial implications are, the importance of their role in establishing and protecting flows cannot be underestimated.

In keeping with this trend, early in the last decade the City of Fort Collins initiated planning to develop a whitewater park on the Cache la Poudre River in the downtown area. In this regard,

the McLaughlin Whitewater Design Group, Denver, Colorado, was contracted to evaluate the potential for and to develop a conceptual design for a whitewater park. The final conceptual design was presented to the City in October, 2007, and concluded that there were indeed adequate flows in the river to provide several options for developing a viable whitewater park. Subsequently, when it became apparent that if NISP were constructed, reductions in flow would likely render a whitewater park non-feasible, the same engineering firm was consulted for an opinion. The enclosed letter dated September, 3, 2008, from Aaron K. Asquith, Principal for the firm, to the City was the response. It concluded that NISP would cut the recreation season to a third of that initially projected and would render a park non-viable. At this point, the City shelved any further planning for a park pending the outcome of the proposed NISP.

Being aware of ongoing strong interest amongst river enthusiasts and downtown businesses for an in-town whitewater park, Save The Poudre: Poudre Waterkeeper elected to commission a study to determine the potential economic impact to the City if a downtown whitewater park were to be constructed. Dr. John Loomis, known for his expertise in assessing the economic impact of outdoor recreational amenities, was contracted for the study. To summarize the relevant, objective scientific conclusions from this report, if NISP were not to be constructed:

- If a whitewater park were to be built, the City of Fort Collins could expect wide usage from both local residents as well as visitation from regional whitewater enthusiasts.
- The potential annual economic impact to the community could be as high as \$745,337.

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

- The DEIS failed to adequately address the economic benefits that the City of Fort Collins will forfeit if unable to build a whitewater park due to reductions in flows of the Cache la Poudre River if NISP were to be constructed as described in the DEIS. The Supplemental DEIS must thoroughly acknowledge and evaluate this adverse economic impact to the City.
- The DEIS very briefly alluded (section 4.17.3.1) to the reduction in paddling recreational opportunities that would result from all of the action alternatives. This analysis was very inadequate and a more robust analysis of the adverse recreational impacts to the City needs to be provided in the Supplemental DEIS.
- In general, the DEIS failed to adequately assess the existing and potential future socioeconomic resources that would be negatively impacted by the action alternatives.

Should you have any technical questions specific to this report, please direct them to Save the Poudre's Boardmember, Greg Speer, 970-631-8230.

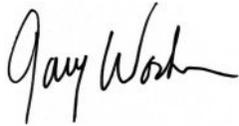
Thank you for the opportunity to provide input and make requests of your office regarding the environmental and economic impacts to northern Colorado of the proposed Northern Integrated Supply Project. Your organization and ours mandate objective, scientifically valid

information to thoroughly comply with the letter and spirit of existing national and state laws. Please acknowledge receipt of this letter.

Respectfully,



Greg Speer, Board of Directors, Save the Poudre: Poudre Waterkeeper



Gary Wockner, Director, Save the Poudre: Poudre Waterkeeper

PO Box 20
Fort Collins, CO 80522
970-218-8310

Cc: Jim Martin – EPA

Attachments

1. FC_WhitewaterPark_Economic_Study_Loomis_McTernan-2-19-2011

http://poudriver.home.comcast.net/~poudriver/FC_WhitewaterPark_Economic_Study_Loomis_McTernan-2-19-2011.pdf

2. WWFlows-letter_from_McLaughlin_to_FC-9-3-2008

http://poudriver.home.comcast.net/~poudriver/WWFlows-letter_from_McLaughlin_to_FC-9-3-2008.pdf