SavethePoudre.org
Poudre Waterkeeper

April 13, 2011

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

Dear Mr. Peter:

RE: Microbial contamination of irrigation waters supplied by the proposed Galeton Reservoir

Save The Poudre: Poudre Waterkeeper recently sent you a report titled *The Farm Facts About NISP*. One section of that report dealt with salinity issues in the South Platte River basin and in particular on lands that would be irrigated using water out of Galeton Reservoir if the proposed NISP were built. Much of the information regarding salinity in *The Farm Facts About NISP* was taken from the Gates report[1], which we have sent to you previously. In addition to salinity however, Gates also discusses other elements of water quality that would be consequential to irrigation water users served by NISP. Specifically, Gates (page 12) highlights microbial contaminants in the canals and reservoirs:

> Pathogens in irrigation water can pose hazards to human health both directly and indirectly. Disease can spread to farm workers through direct contact with contaminated water and with wet vegetated surfaces or by inhalation of the aerosols produced by sprinklers. Threats to the general public occur through ingestion of active pathogens that survive on produce that has come in contact with irrigation water. This is especially of concern in the case of raw – edible vegetable crops, like the onions, carrots, and cabbage grown in the SPWCP area.

In 1998, Gates found that many measurements of fecal coliform concentrations near the point of diversion for the proposed Galeton Reservoir (and at other locations) exceeded the maximum recommended by the World Health Organization (1000 colony forming units [CFU] per 100 milliliters). Some samples were greater than 20,000 CFU/100ml (page 62). If coliform-contaminated water were taken from the South Platte River, further incubated in Galeton Reservoir, and then used to irrigate vegetable crops that may be consumed raw, the excessive coliform concentrations would be cause for alarm in both vegetable consumers and all human workers in contact with irrigation water. Gates (page 66) further elaborates that:

[1] Gates, T.K. 1999 (Draft). Assessment of Water Quality for Irrigation under the South Platte Water Conservation Project. Submitted to the Northern Colorado Water Conservancy District. 69 pages. http://savethepoudre.org/docs/gates-salinity-report-1999.pdf

> Given that microbial concentrations appear to periodically exceed current standards for irrigation water, the sources [of contamination] need to be carefully identified and mitigation measures need to be considered. In addition to fecal coliform, the presence of protozoa, helminths [worms] and viruses needs to be investigated.

The ramifications of Gates remarks will be significant in adequately preparing the Supplemental NISP DEIS because as can be seen from Figure 1 and Figure 2, below, at least some portions of the lands that may be irrigated through the proposed Galeton Reservoir are currently being used to grow vegetable crops. As was discussed in *The Farm Facts About NISP*, using saline water or water contaminated with coliform bacteria or other microbial elements would certainly eliminate or greatly constrain some farming options, having both economic and human health impacts. Though other lands in the south Platte basin undoubtedly are using this highly contaminated water, the proposed NISP (and Galeton Reservoir) would infect new lands.

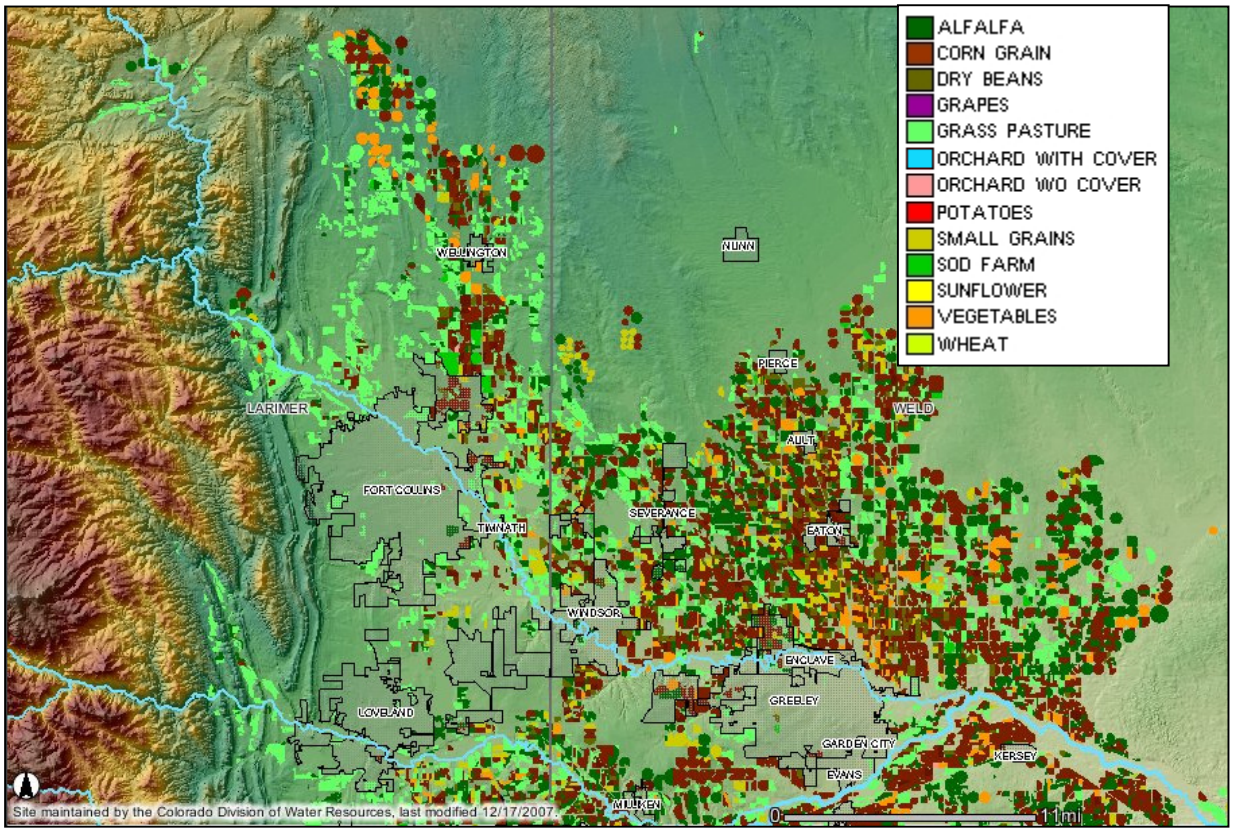

Figure 1. Map of crop land in the Larimer and Weld county area, portions of which would be served by the proposed Galeton Reservoir. Courtesy of George Wallace, Larimer County Agricultural Advisory Board, 2011.

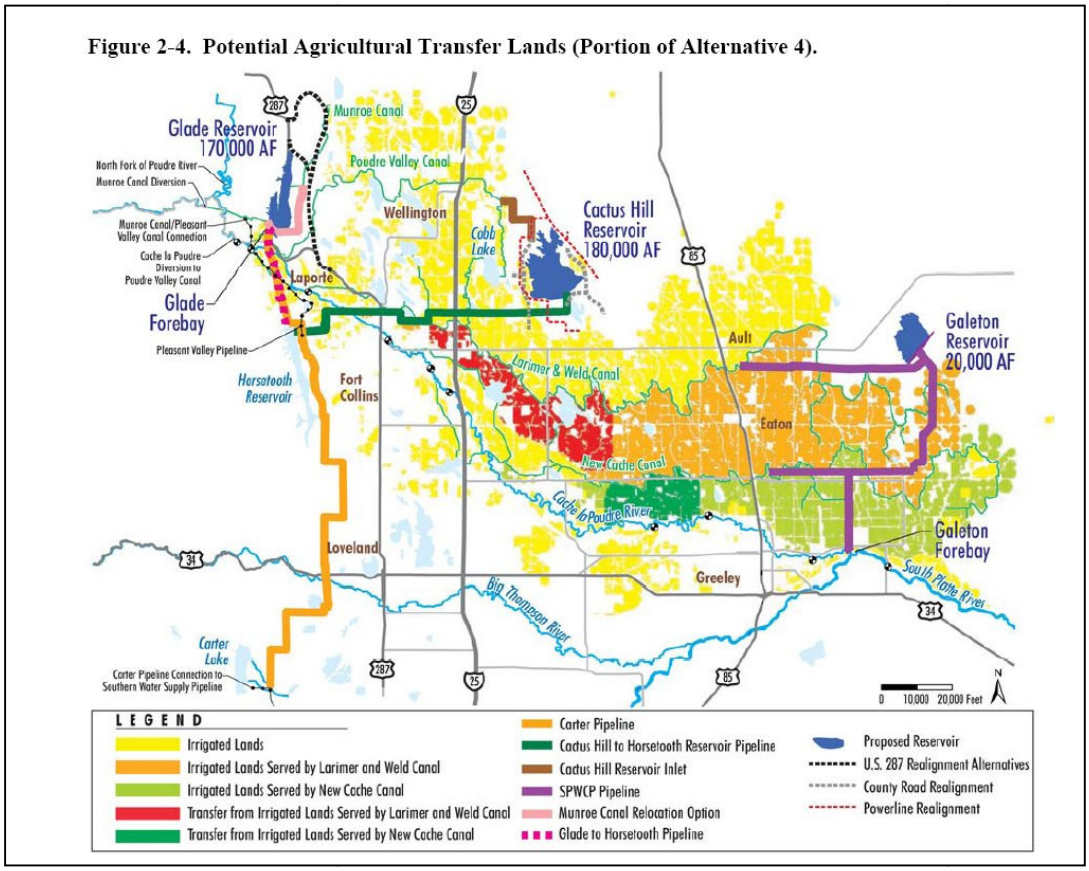

Figure 2. Irrigated lands in the NISP area, portions of which would be served by the proposed Galeton Reservoir. Taken from the NISP Draft Environmental Impact Statement.

It seems clear that this potential contamination issue is yet another issue that must be investigated in the Draft Supplemental Environmental Impact Statement to comply with the National Environmental Policy Act. Should you have any technical questions specific to this letter, please direct them to Save the Poudre's Board member, 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 mandate objective, scientifically valid information to thoroughly comply with the letter and spirit of all existing national and state laws. Please acknowledge receipt of this letter.

Respectfully,

John Bartholow, Save the Poudre: Poudre Waterkeeper Board of Directors

Gary Wockner, Director Save the Poudre: Poudre Waterkeeper, PO Box 20, Fort Collins, CO 80522, 970-218-8310

CC: US Environmental Protection Agency