



FORT COLLINS AUDUBON SOCIETY
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Promoting the appreciation, conservation, and restoration of ecosystems, focusing on birds and other wildlife, through education, participation, stewardship, and advocacy.

September 12, 2008

Mr. Chandler Peter
U.S. Army Corps of Engineers
Denver Regulatory Office
9307 S. Wadsworth Boulevard
Littleton, CO 80128

Mr. Peter:

The members of the Board of the **Fort Collins Audubon Society** (approximately 700 members) have reviewed the Draft Environmental Impact (DEIS) for the Northern Integrated Supply Project (NISP). We have also reviewed materials and reports received from numerous scientists and various departmental staff members of the City of Fort Collins regarding the document. We are convinced that building Glade Reservoir and the rest of the NISP project would be an ecological detriment for the Poudre River and result in environmental as well as financial harm to communities along the Cache la Poudre River, especially the City of Fort Collins. We have also concluded that the DEIS is so flawed as to be inadequate as a guide for making a decision about whether or not to build NISP.

As we understand the plethora of data surrounding the construction of Glade Reservoir we are led to believe that approximately 55% of historical flows is already being removed as a result of a century of water diversion projects. It is now proposed that approximately 40% of the remaining flows be diverted to supply Glade Reservoir, leaving only approximately 27% of historical flows to remain in the river as it flows through Fort Collins and other communities downriver.

We believe that the U.S. Army Corps of Engineers should deny the Northern Colorado Water Conservancy District (NCWCD) permission to construct Glade Reservoir for the following reasons.

- 1. Glade Reservoir will cause ecological degradation to the river. It has not been demonstrated whether any of the adverse effects can be mitigated:**
 - (a) Reduced flows will result in water temperatures rising with negative impacts on the existing fishery. Fish and aquatic insects would all be negatively affected.
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(b) The removal of current peak “flushing” flows will result in increased sedimentation of the river channel and a proliferation of vegetative growth in the river channel which, more than likely, will include a high percentage of invasive non-native plant species. Anticipated outcomes of this would include a degradation of wildlife habitat from the non-native plant species as well as an actual elevation increase of the 100-year flood plain. Increased sedimentation would destroy the spawning beds of fish and suffocate aquatic insects.

(c) A reduction of river flows will result in a lowering of existing ground water tables in the riparian corridor, having severe negative impacts upon the cottonwood canopy along the river as well as the entire vegetative structure along the river. This is the habitat that is utilized by about 220 species of birds as well as numerous mammals and amphibians, and also is home to several rare plant species.

2. **The construction of Glade Reservoir would cause severe degradation to our investment in area natural areas:** Fort Collins, Larimer County, and Great Outdoors Colorado Trust Fund have invested tens-of-millions of dollars in the natural areas and bike paths along the corridor all the way from Bellvue out to I-25 and, soon, beyond. It makes no sense to drain the river when this investment is entirely dependent on a healthy river to provide the recreational, aesthetic, and ecological assets that the citizens of Fort Collins, Larimer County, and Colorado have invested heavily in. A conservative estimate is that visitation to the river corridor and its bike paths would decrease by 30% or more.
3. **The DEIS fails to seriously consider the impacts that dewatering the Cache la Poudre River will have on the many species of birds (233) that breed, migrate through, or otherwise depend on the river corridor:** In early 2007, the Fort Collins Audubon Society nominated a twenty-mile corridor along the Poudre River, from Bellvue through southeast Fort Collins, to be designated as the Cache la Poudre Urban River Corridor Important Bird Area (IBA). The Important Bird Area program is an effort to identify and protect bird habitat across the United States. IBA’s are jointly designated by technical committees of ornithologists and willing land owners, public and private. To be recognized as an I.B.A., areas must meet certain scientific criteria, including representing rare habitat within a state or region.

Dr. Nicholas Komar, a researcher at the Centers for Disease Control and a co-author of the nomination, organized breeding bird censuses along the river in 2001, 2002 and 2006. According to Komar, these censuses show that the river corridor supports many species of birds found rarely, if at all, outside the corridor, including common merganser, black-crowned night heron, cedar waxwing, and orchard oriole. In addition, many species are found in much greater numbers within the corridor than outside it, including yellow warbler, bank swallow, wood duck, kingfisher, osprey, great-blue heron and eastern kingbird. Komar has stated that “Our surveys indicate that the river corridor is a unique, restricted and important habitat type for birds in Larimer County.”

The “IBA Nomination for the Cache la Poudre Urban River Corridor: Supporting Text” documents some of the rich natural history education that the Poudre River corridor and its birds provide to the citizens of Fort Collins. We ask that the Corps consider this document, since such information is not provided in the NISP DEIS. Indeed, one can read the entire NISP DEIS and not have any inkling that the river corridor is the primary resource for nature study and nature appreciation for Fort Collins, a city of 140,000 people.

There are also two active bald eagle nests along the Poudre River in Larimer County that could be placed at risk

4. **Glade Reservoir is a threat to Fort Collins' economy:** The City calls the river one of its "economic engines." The downtown economy is increasingly dependent on the river's proximity as a cultural and recreational resource. The Downtown River District, Beet Street and UniverCity Connections all identify the river as a major driver in the downtown economic experience. Draining the river would permanently threaten this economy.
5. **If Glade Reservoir is built, the City of Fort Collins potentially faces an estimated \$125 to \$215 million dollars of expenses in upgrades to its drinking water and wastewater treatment facilities.** If a pipeline is constructed between Glade and Horsetooth Reservoirs to facilitate future transfers of NISP waters to customers further south, it is anticipated that Total Organic Carbon (TOC) levels would increase in Horsetooth Reservoir. The TOC levels would be unacceptable because the necessary chlorination of Horsetooth Reservoir waters for drinking purposes would produce carcinogenic materials. Furthermore, since river levels would be so drastically lowered from today's levels, the current dilution effect on wastewater discharges would no longer be available. The City estimates that it would have to spend \$50 to \$90 million to retrofit its drinking water treatment plant as well as an additional \$75 to \$125 million to retrofit its waste water treatment plants. Annual operating costs are estimated to increase by \$3 million for drinking water treatment and an undetermined amount for waste water treatment. Since the majority of Fort Collins Audubon Society's members are tax- and rate-paying citizens of Fort Collins, we are displeased with the prospects of our taxes increasing because of reduced water levels in the Poudre.
6. **Reduced flows in the Poudre River would increase the potential for increases in populations of *Culex* mosquitoes bearing West Nile virus.** This would mandate increased expense on part of both Fort Collins and Larimer County for mosquito control programs.

Respectfully,

Joel Hurmence – President, and
William H. Miller - Conservation Chair
On behalf of the board and members
of the Fort Collins Audubon Society
