

ATTACHMENT C



Katie Beilby <beilbykm@co.larimer.co.us>

Fwd: Northern Integrated Supply Project - 1041 Permit

Rob Helmick <helmicrp@co.larimer.co.us>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Thu, Jun 4, 2020 at 2:49 PM

----- Forwarded message -----

From: **Heidi Jenson** <heidij@boxeldersanitation.org>
Date: Thu, May 7, 2020 at 9:07 AM
Subject: Northern Integrated Supply Project - 1041 Permit
To: <rhelmick@larimer.org>
Cc: Brian Zick <brianz@boxeldersanitation.org>

Hi Rob,

Please see attached comments.

If you have any questions please let us know.

Thank you.



**Boxelder
Sanitation
District**

Heidi Jenson
Development Coordinator
P.O. Box 1518, Fort Collins, CO 80522
(970) 498-0604 | www.boxeldersanitation.org

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BCC 08/17/20**NISP**



Robert Helmick
Senior Planner

Community Development Department
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PO Box 1190
Fort Collins, CO 80521
970-498-7682
rhelmick@larimer.org
<https://www.larimer.org/planning>



1041 Review 5-6-2020.pdf
140K



May 6, 2020

Larimer County Planning
P.O. Box 1190
Fort Collins, CO 80522

Attention: Rob Helmick

RE: Case Number: Northern Integrated Supply Project – 1041 Permit
Title:
Owner/Applicant:
Owner Contact:
Parcel Number(s):

Boxelder Sanitation District (BSD), has reviewed the Site Plan identified as:

Northern Integrated Supply Project – 1041 Permit

The District hereby advises as follows:

- ☒ There is no objection to this proposal. See comments below.
- ☒ Responses required to the comments below.
- ☐ The District will respond at the hearing date of _____.

Comments:

- 1) The maps for the Poudre Pipeline and County Line Pipeline do not show all of the Boxelder sewers adjacent to these routes. In addition, there are future sewers and pump stations being planned that are adjacent to the proposed routes. Northern Water needs to coordinate with Boxelder Sanitation District on the impacts to all current and future sewers impacted by the proposed project.

We look forward to review future submittals on this project. Please feel free to contact me if you have any questions.

Sincerely,

Brian Zick, P.E.
District Manger

May 14, 2020

Linda Hoffman
Larimer County Manager
PO Box 1190
Fort Collins, CO 80522-1190

Dear Linda:

Larimer County recently referred a development application from Northern Water for the construction of infrastructure to support the Northern Integrated Supply Project (NISP) to the City of Fort Collins for review and comments. As long-time partners on regional issues and development within the Fort Collins Growth Management Area (GMA), the City appreciates the opportunity to provide the attached comments on the 1041 Application and requests Larimer County's consideration and attention to the City's concerns regarding development of NISP infrastructure within the Fort Collins GMA and City-owned natural areas.

As you know, the City has been strongly involved in the state and federal permitting processes for NISP and has serious concerns about the ecological impacts of the project on the health of the Poudre River. The City has long sought to enhance and protect stream flows, riparian habitat, and provide appropriate opportunities for recreational uses along the river corridor using development buffer standards, restoration and enhancement efforts, and creating a network of City-owned natural areas.

The development of new diversion structures and piping along the Poudre River corridor and within adjacent natural areas may have negative ecological and community impacts along portions of the river corridor passing through the Fort Collins GMA. We encourage the County to consider the City's comments and suggestions for further evaluation of design alternatives during its review to help address and mitigate these impacts.

Sincerely,

DocuSigned by:


Darin Atteberry
City Manager
City of Fort Collins



281 North College Avenue
P.O. Box 580
Fort Collins, CO 80522.0580

970.221.6376
970.224.6134 - fax

May 13, 2020

Carl Brouwer
Northern Integrated Supply Project Water Activity Enterprise
220 Water Avenue
Berthoud, CO 80513

RE: Referral Comments for the Northern Integrated Supply Project (NISP) 1041 Application

The following are the City of Fort Collins ("City") staff review comments specific to the Northern Integrated Supply Project ("NISP") infrastructure that the Northern Colorado Water Conservancy District ("Northern Water") has proposed within the Fort Collins Growth Management Area ("GMA") as described in the Northern Water application to Larimer County under Chapter 14 of Larimer County's Land Use Code, which contains the County's 1041 regulations.

The submittal of these comments does not alter the Fort Collins City Council's current position on NISP as expressed in Council Resolution 2018-093 as:

"the City Council cannot support NISP as it is currently described and proposed in the Final Environmental Impact Statement (FEIS) with the understanding that the City Council may reach a different conclusion with respect to a future variant of NISP and its mitigation plan, if such variant and associated mitigation address the City's fundamental concerns expressed in the City's comments to the DEIS, SDEIS, the State Fish and Wildlife Mitigation and Enhancement Plan, and FEIS through improved mitigation or other means."

The comments have been compiled specifically for the City's review of the NISP 1041 application made with Larimer County. Many of the following comments (as they may be amended or updated) may appear in subsequent City review processes that will be required of NISP, such as the Site Plan Advisory Review ("SPAR") for pipeline portions located within the City of Fort Collins and an evaluation of the project's design and construction relative to the City's Natural Areas Department easement policy.

As a referral agency in the 1041 review process, City staff acknowledges that the comments are advisory in scope and encourages Northern Water to take the following recommendations and requests for additional information into consideration. Recommendations are based on the City's Land Use Code standards and organized around the applicable 1041 Review Criteria found in Larimer County Land Use Code ("LCLUC") Section 14.10.D.

Please direct any questions regarding City staff's comments to Cameron Gloss, Long Range Planning Manager, at 970-224-6174 or cgloss@fcgov.com.

Comment Summary:**1. LCLUC 14.10.D (1) (The proposal is consistent with the master plan and applicable intergovernmental agreements affecting land use and development).**

1. Most of the Poudre Intake Pipeline lies within the Fort Collins GMA and is governed by the East Mulberry Corridor Plan, which was jointly adopted by Larimer County and the City in 2002 (amended in 2003). No evaluation of the proposed pipeline alignments relative to the East Mulberry Corridor Plan is contained in the 1041 application and should be addressed as the adopted plan is an element of Larimer County's Master Plan and further implements the Intergovernmental Agreement between the City and Larimer County Regarding Cooperation on Managing Urban Development (2000).
2. The portion of the preferred pipeline location, between Lemay Avenue and Timberline Road, is designated within the East Mulberry Corridor Plan as "Natural Buffer." The plan cites the need for the "preservation, restoration and enhancement of these designated areas," in that "they provide a valuable wildlife habitat and contribute to the area's scenic quality." The following policy relates specifically to the preservation of this portion of the corridor:

Policy EMC. ONL – 1.1 The interface between the Poudre River riparian habitat and development along East Mulberry Street, should be coordinated to retain environmental quality, encourage wildlife habitat and, where impacts can be appropriately buffered, provide recreational use.

3. The City thus requests that Northern Water provide an analysis of the proposal's consistency with the East Mulberry Corridor Plan relative to all adopted Plan Goals, Principles and Policies.

2. LCLUC 14.10.D (2) (The applicant has presented reasonable siting and design alternatives or explained why no reasonable alternatives are available.).

Six alignment alternatives were considered and evaluated for those portions of the Poudre River Intake Pipeline, (2 for the Poudre Intake West and 4 for the Poudre Intake Pipeline toward the east) located within the Fort Collins GMA. The City has significant concerns over the methodology that Northern Water used. The City recommends that Northern Water perform a new alternatives analysis for the Poudre Intake Pipeline using the comments below as guidance for location and analysis, to determine the least environmentally damaging practicable pipeline route.

1. It is unclear why additional alternatives that extend the pipeline along the Mulberry right-of-way (longer than currently proposed) were not evaluated, or if modifications to the proposed alternatives could be made that further decrease negative impacts on public, private, and environmental resources.
2. Alternative routes for the Poudre Intake Pipeline could be reviewed through a framework that evaluates environmental impacts and selects the least environmentally damaging one. It is the City's understanding the proposed pipeline alignment was presented for

the first time in the NISP Final Environmental Impact Statement (“FEIS”). Therefore, an evaluation of alternatives and associated environmental impacts comparing pipeline alignments did not occur within the federal National Environmental Policy Act (“NEPA”) process. Instead, it occurred this year using the decision matrix of review criteria, which is a very different approach to evaluating alternatives.

3. The methodology for the Poudre Intake Pipeline Alternatives Analysis provides scoring through a decision matrix of criteria with only two environmental criteria included. The two criteria are weighted equally with 16 other criteria, so the combined weight of the environmental criteria contributes only 9% to the total score. The City disagrees with this undervaluation of environmental impacts and the approach where environmental impacts were given equal value to other criteria, such as “Easement Difficulty.”
4. Furthermore, the methodology does not evaluate the alternatives based on the relative importance (weights) of each criterion. The scoring approach essentially treats each criterion as independent and of equal weight, when many are interrelated and not of equal importance. The City recommends applying weights to each criterion to better address tradeoffs between disparate goals.
5. The criterion labeled “Environmental Impacts” only considers linear feet of wetlands and riparian areas. Linear feet of wetland is not a standard or meaningful approach to evaluating impacts to wetlands. The federal permitting process typically evaluates a number of environmental factors, yet many of these factors and resources were unaccounted for in the alternatives assessment for the pipelines that will be impacted by the proposed alignment.
6. Linear feet of pipeline in City-owned natural areas is the second of the two environmental criteria. With impacts to 5,700 linear feet in high visitor use and sensitive Natural Areas, the short- and long-term impacts are of concern to the City. The City disagrees with Northern Water’s designation of this criterion as the yellow or middle scoring category because it is only the middle category due to the range of alternatives presented, not the actual impacts of 0.6 miles of pipeline installation would have on natural habitats.
7. The alternatives analysis did not consider the disruption and impacts on wildlife. Floodplain corridors provide wildlife with a mosaic of aquatic, wetland, riparian, and forest and grassland habitat types all along a narrow corridor within a developed landscape. Therefore, these corridors contribute a disproportionate (high) value towards supporting wildlife, both local and migratory. The City recommends adding a wildlife criterion as a factor in the alternatives analysis.
8. The floodplain criteria state the floodplains are not a risk to the pipeline, but the perspective needs to also consider the risk that the installation of a pipeline close to the river may impact opportunities for increasing resilience to large floods. The pipeline running through Kingfisher Point Natural Area adjacent to the river will prevent future opportunities for increasing the conveyance capacity through the lowering of floodplain elevations (for example with the creation of overflow side channels).

9. While the alternatives analysis considers impacts to traffic, it does not consider impacts to visitor use of City-owned and publicly-accessible lands and trails.
10. It should be noted that the City's Natural Areas Department easement policy does not consider cost as a factor in the analysis of proposed routes.

3. LCLUC 14.10.D(3) (The proposal conforms with adopted county standards, review criteria and mitigation requirements concerning environmental impacts, including but not limited to those contained in this Code.).

No comment at this time.

4. LCLUC 14.10.D(4) (The proposal will not have a significant adverse affect on or will adequately mitigate significant adverse affects on the land or its natural resources, on which the proposal is situated and on lands adjacent to the proposal).

Wetlands and other Waters of the US (WOTUS)

Reported impacts to Wetlands and other WOTUS are inconsistent throughout key permitting documents. For this reason, it is more difficult to determine the sufficiency of proposed wetland mitigation in Larimer County and within the GMA.

The 1041 Wetland and Water Mitigation Plan prepared by the NISP WAE (Pinyon, 2020) presents a reduction of impacts across almost all categories. For example, Pinyon (2020) shows a reduction in impacts at Glade. Furthermore, the permanent functional losses to Poudre River wetlands are treated differently across alternatives and reports.

This leads to uncertainty over which set of values will form the basis for the mitigation commitments in the forthcoming Wetland and Open Water Mitigation Plan. Pinyon, 2020 states:

“the Project is in the process of developing a Wetland and Open Water Mitigation Plan (January 20, 2020 Draft) in order to comply with the USACE 2008 Mitigation Rule (33 CFR Part 332) (USACE, 2008a; Pinyon, 2020). The Wetland and Open Water Mitigation Plan describes how the Project will mitigate for unavoidable permanent impacts to WUS.”

It is unclear whether this forthcoming plan will compensate for the discrepancies documented here, as well as the functional losses to aquatic resources (wetland and streams) as required in the 2008 rule and the Colorado Mitigation Procedure (USACE, 2019).

Understanding there are small differences in the scope and sequencing of these documents, the City recommends that additional information be provided that clarifies the aquatic resource impacts by project component, associated mitigation, regulatory scope, and the relationship between the documents that describe them.

	Alt 2M	Alt 2M	Alt 2	Alt 2
	FEIS Table 4-64	1041-Pinyon ¹ Table 1	FEIS ² Table 4-67	FWMEP ² Table A2
Permanent Wetland Impacts				
Glade Reservoir	42	31.3	42	Not broken out
US 287	3	Not listed	3	
Conveyance Systems	<1	0.044	<1	
Total	45+	31.344	45+	44
Temporary Wetland Impacts				
Glade Reservoir	4	2.361	4	Not broken out
US 287	<1	Not listed	<1	
Conveyance Systems	10	5.697	5	
Total	14+	8.181	9+	8
Permanent Impacts to Waters of the US				
Glade Reservoir	8	0.93	8	Not broken out
US 287	1	Not listed	<1	
Conveyance Systems	<1	0.59	1	
Total	9+	1.52	9+	12
Temporary Impacts to Waters of the US				
Glade Reservoir	2	2.361	2	Not broken out
US 287	<1	Not listed	<1	
Conveyance Systems	5	2.292	4	
Total	7+	4.653	6+	3
Permanent Indirect wetland impacts to riparian wetlands				
Poudre wetlands	0 (30)	Not addressed	17	9

1- 1041- Pinyon, 2020

2- FWMEP- the state approved Fish and Wildlife and Mitigation Enhancement Plan reported wetland impacts based on Alternative 2 therefore Alternative 2 from the FEIS is presented for comparative reference.

General City Environmental Protection Standards

While this project is following Federal, State and County environmental studies and protection standards through NEPA, State, and 1041 permitting processes, the City has separate, and often more stringent study requirements and protection standards for development projects outlined in the City's Land Use Code. In acknowledging the work already performed by Northern Water, the comments below describe the City's requirements (found in Section 3.4.1 of the Land Use Code) that are applicable to this project within the GMA. City staff encourages Northern Water adhere to these City Land Use Code standards.

1. If a project is within 500 feet of a known or potential natural feature, the City requires an Ecological Characterization Study (ECS) be performed by a qualified professional that describes resources and their respective value, ecological function and character. The ECS is the guiding document in staff's decision-making process related to mitigation and protection requirements. Because the information provided through this application is

conceptual in scope the value of resources has not been evaluated to allow City staff to determine existing conditions and adequate mitigation measures, City staff recommends completing an ECS for areas within the GMA, using the criteria outlined in Section 3.4.1 (D)(1) of the Land Use Code.

2. The City's adopted Natural Habitat and Features standards in Land Use Code Section 3.4.1 (D)(2) protect wetlands irrespective of their jurisdictional determination. Therefore, any non-jurisdictional wetlands that are impacted and unaccounted for require mapping and mitigation. Detailed recommendations for protecting, mitigating and enhancing all wetlands are required within the ECS. Based on impacts, City staff may require a Wetland Restoration Plan, Weed Management Plan and Monitoring Plan (3+ years) to ensure mitigation success.
3. If a proposed development disturbs a jurisdictional wetland, the developer is required per Land Use Code Section 3.4.1(D)(2) to provide to the City a written statement from the U.S. Army Corps of Engineers that the development plan fully complies with all applicable federal wetland regulations as established in the federal Clean Water Act. City staff recommends that Northern Water provide this letter to the City.

City Buffer Standards and Environmental Protocols

Section 3.4.1 of the City's Land Use Code identifies natural habitats and features for protection and requires specific buffer distances to protect the character and function of these resources from the impacts of construction and ongoing activity associated with the development. Given the noise and impacts from construction activities and the continual access needs for ongoing operations and maintenance along the pipeline corridor, City staff recommends adhering to the following requirements.

Buffers

1. Poudre River Corridor 300' Buffer (measured from top of bank or edge of riparian forest/vegetation whatever is more stringent). The Poudre River is designated as a National Heritage Area and is considered the City's highest valued regional and urban wildlife corridor. The value of riparian forest and bird habitat impacted along the river would take decades to re-establish and may result in nest failure, as stated in the Wildlife Conservation Plan. City staff is concerned about the close proximity of the pipeline to the river from north of Kingfisher Point Natural Area to the crossing of Timberline Road. The proximity results in impacts to soils, native vegetation, wetlands, and restoration projects previously performed by the City's Natural Areas Department. The grasslands at the Kingfisher Point Natural Area is particularly hard to restore given the beet lime waste material underneath. Therefore, restoration progress is slower than usual. Starting restoration all over again for a strip in the middle of a field is not preferred. Additionally, nearby cliffs have long supported various cliff nesting birds such as bank swallows and (today) a nesting kingfisher. City staff recommends the pipeline be moved further from the Poudre River to reduce impacts.
2. Boxelder Creek: 100' Buffer (measured from top of bank or edge of wetlands, whichever greater). Boxelder Creek is considered a regional wildlife corridor and the crossing of Boxelder Creek immediately west of I-25 is concerning. Staff recommends boring the

pipe under the creek and digging bore pits 100' from top of bank or edge of wetlands (whichever is greater) to minimize impacts to the creek, habitat and associated wetlands.

3. Irrigation Canals: 50' Buffer (from top of bank or edge of wetlands, whichever greater). The City of Fort Collins views irrigation canals as wildlife movement corridors. The City recommends the value of ditches be evaluated in the ECS from a wildlife corridor, vegetative quality and habitat perspective and provide mitigation for impacts. The City also recommends bore pits occur 50' from the ditch's top of bank or edge of wetlands at ditch crossings, whichever is greater, to minimize impacts.
4. Lakes: 100' Buffer. The City is concerned about the close proximity of the pipeline to the ponds at the Riverbend Ponds Natural Area. The City recommends the width of temporary construction easement be reduced in this area to minimize impacts to the pond embankments, wetlands and wildlife using the ponds.
5. Dry Creek: 100' Buffer. The City views Dry Creek as a wildlife movement corridor. The City recommends bore pits to occur 100' from the Creek's top of bank or edge of wetlands, whichever is greater, to minimize impacts.
6. Riparian Forest: 50' Buffer. Riparian forest along the Poudre River and Boxelder Creek will be impacted by the proposed project. The City recommends avoiding these sensitive areas by providing a 50' buffer from the edge of forest canopy.
7. Wetlands Buffer: As noted above the City protects all wetlands irrespective of jurisdictional status. For all wetlands, the City requires the following buffers for wetlands and recommends Northern Water to adhere to these standards.:
 1. Wetlands >1/3 acre in size: 100'
 2. Wetlands <1/3 acre in size: 50'

Wildlife Protocols

City staff encourages Northern Water to adhere to the following requirements related to mitigating wildlife impacts, found in 3.4.1 of the City's Land Use Code.

1. The City requires that construction activity be organized and timed to minimize the disturbance of Sensitive or Specially Valued Species occupying or using on-site and adjacent natural habitats or features. City staff is concerned about construction noise near wetlands at Riverbend Ponds, along the Poudre River and irrigation ditch corridors. The activity could have negative impacts on wildlife such as nest failure for breeding birds, or the inability of prey to detect predators.
 - a. Raptors and Song Birds: The City requires that trees that are known to have served as raptor nest sites not be removed within five (5) years of the last known nesting period. If the tree is removed, it shall be mitigated in accordance with Section 3.2.1, Landscaping and Tree Protection Standards.
 - b. The City requires raptor nests be inventoried within a 500' buffer on either side the Right of Way and indicated by species (when possible).

2. Fox, coyote and badger dens: 50' Buffer. The City requires surveys be performed to determine the location of fox, coyote, and badger dens throughout the limits of development and adhere to the 50' buffer requirement.
3. Prairie Dogs:
 - a. If more than 1 acre of prairie dog colonies are eradicated, Northern Water would be required to mitigate for the resource value lost either through a payment-in-lieu or trap and donate.
 - b. Methods for removing prairie dogs must be reviewed and approved by the Colorado Parks and Wildlife.
 - c. Following relocation or eradication activities for prairie dogs, the City requires that a report be provided that documents when prairie dog removal occurred, the method(s) that were used to remove prairie dogs, measures taken to ensure that prairie dogs will not re-inhabit the site, and confirmation that no threatened or endangered species were harmed by removal activities.

Restoration Protocols

1. Under the Buffer Zone Performance Standards in Land Use Code Section 3.4.1(1)(g), the applicant must undertake restoration and mitigation, such as regrading and and/or replanting of native vegetation, to enhance the natural ecological characteristics of the buffer area.
2. The width of the temporary construction right of way varies between documents (120' in Wetland Mitigation Plan (Pinyon, 2020), 100' in Technical Memorandum No. 3 (Northern Water, 2020), etc.). City staff recommends the width for temporary construction Right of Way be minimized, particularly around sensitive natural and recreational resources (wetlands, mature trees, trails, etc.).

Comments specific to Natural Areas lands

City of Fort Collins Natural Areas Policy:

City of Fort Collins Natural Areas are conserved due to citizen ballot measures that specify these lands are to be protected and enhanced for native plant and wildlife communities.

Therefore, siting of facilities needs to consider how these resources will be protected and enhanced within City Natural Areas.

Homestead Natural Area:

1. The diversion point and pipeline installation is located within a recently restored and highly active riparian wetlands. Significant efforts went into ensuring the success of this restoration which has now been establishing for the past seven years. The location is also flooded at relatively low flows so the immediate success of future restoration is uncertain due to annual scouring flows. The proposed mitigation for these temporary impacts is to return the habitat to its current condition, but this does not offset the *temporal* loss. For this reason, the City recommends Northern Water collaborate with the City's Natural Areas Department to determine the best location for the diversion.

2. The City understands that Northern Water has identified a preferred diversion point, but that there may be some flexibility in the precise location. There may be pros and cons to subtle adjustments of the take-off point. Moving the location of the new diversion somewhat upstream may result in multiple benefits including; avoiding damage to the recently restored active riparian zone, minimizing construction footprint in sensitive areas, taking advantage of existing slower backwater conditions upstream, and minimizing erosion from spring flows on vulnerable post-construction that occurs frequently in low lying zone.
3. The City owns the land (in-channel and in the riparian zone) at the location of the proposed diversion structure near Mulberry Avenue. To avoid further fragmentation of aquatic habitat and sediment and to ensure fish passage, the City recommends using a low-profile design approach such as a riffle-crest structure. The tie in to either bank must be resilient to scouring flows but as natural functioning and looking as possible to avoid disconnecting the channel from the riparian zone.
4. According to the Colorado Mitigation Procedures (USACE, 2019) the impacts of a new diversion to stream functions must be fully mitigated. Without baseline hydrogeomorphic and biological data analyses of this complex river reach it is impossible to ensure mitigation of impacts to stream functions. It also impossible to ensure the longevity of the new diversion structure or that it will results in a resilient reach of river. The City recommends spatial footprint for the design process and hydrogeomorphic analysis is larger than just the immediate footprint of the structure (i.e. it extends further upstream and downstream). Also, because the river is a split channel at this location, proper evaluation of river dynamics at the reach scale will be essential for guaranteeing the protecting of local infrastructure during large flood events (the Mulberry Treatment plant and the Mulberry Avenue Bridge).
5. Because this area sees frequent visitor use, City staff recommends the design elements strongly consider public safety and potential vandalism.

Kingfisher Point Natural Area:

1. The City recommends the footprint of the infrastructure on the Kingfisher Point Natural Area (pumphouse and settling pond) be minimized to the greatest degree possible.
2. Through the Kingfisher Point Natural Area, the pipeline is proposed to run near to the river and justification for this is not provided. By laying pipeline in the middle of the natural area/floodplain and close to the river, it will limit future opportunities for excavating floodplain material to increase the conveyance capacity (for example with the creation of overflow side channels). Also, at this location the riverbank forms a cliff and hosts several cavity nesting birds, including Northern rough-winged swallow, bank swallows, and kingfishers. Nesting success is uncertain with this work nearby. The City recommends the pipeline be routed as far north as possible (away from the river) from the pumphouse to the Fort Collins Nursery.

3. The City will not consider the sale or conveyance of any real property rights on any City property for the NISP project until Northern Water has a final and non-appealable Clean Water Act Section 404 permit.
4. The City may wish to have input on specific aspects of aesthetics and screening of the proposed infrastructure to best fit the landscape and character of the Kingfisher Point Natural Area.
5. As previously noted, the City's Natural Areas Department easement policy does not consider cost as a factor in the analysis of proposed routes.

Riverbend Ponds Natural Area:

1. Along the eastern end of the pipeline route through Riverbends ponds the pipeline is located along a narrow zone available immediately adjacent to a high value wetlands complex. In addition to hosting higher diversity of birds, this area is also home to three rare plants: *Carex lasiocarpa*, *Glaux maritima*, *Eustoma grandiflora*. The City recommends the temporary construction easement for this section of pipeline use as narrow a width as possible to completely avoid impacting the adjacent wetlands.

Easements from Natural Areas

1. In addition to the City comments presented in this 1041 review, the *Natural Areas and Conserved Lands Easement Policy* (adopted 2012, updated 2018) requirements will apply during the easement application process and can be found in the Easement Request Packet at <https://www.fcgov.com/naturalareas/easement.php>
2. Please identify the permanent easement width, as well as the frequency and type of operations and maintenance activities along the permanent easement.
3. Permanent and temporary easement width justification will be required by the Natural Areas Department easement policy.

Visitor Use Impact

Consistent with the Natural Areas Easement Policy, the City will require a minimization/mitigation plan for the visitor use impacts anticipated during construction. The four areas of particular concern are:

1. Homestead Natural Area, Williams Natural Area, and the Poudre Trail in the vicinity of Mulberry Bridge.
2. The Timberline parking lot at Riverbend Ponds Natural Area.
3. Trail closures and detours on Riverbend Ponds Natural Area.

There may be a potential conflict with the future trail near Prospect and I-25. Timing of the NISP piping construction may or may not affect this trail or the potential future development at the Prospect Gateway. Further coordination may be required. The City of Fort Collins 2013 Paved Recreational Trail Master Plan, including any future updates to this plan, indicates the general location of future paved trails. Trail crossings of the pipeline may be required to construct the buildout of the trail system. Paved trails will be allowed to cross the

pipeline easement as long as construction or maintenance of the trail does not impact the operation or construction of the pipeline.

Based on the City's Natural Areas Easement Policy, the following will be required:

- Trail and public access closure plan
- Detour plan for the Poudre Trail
- Potential temporary paved trail if trail(s) are closed longer than 2 weeks.
- Parking alternative plan for Riverbend Ponds Natural Area parking lot. The plan should include only partial lot closures and offsite parking.
- Trail closure plan for Riverbend Ponds Natural Area and advanced public notice for closures will be required by the Natural Areas easement policy.

5. LCLUC 14.10.D(5) (The proposal will not adversely affect any sites and structures listed on the State or National Registers of Historic Places).

1. Any aspect of the development plan that will include federal involvement through permitting or funding triggers compliance with Section 106 of the National Historic Preservation Act, through a review coordinated by the State Historic Preservation Office (History Colorado). An area of potential effect (APE) would define the geographic area or areas within which an undertaking may create adverse effects on archeological and historic resources and require documentation forms and potential mitigation of any determined adverse effects. While that requirement is separate from local historic review and compliance, the City of Fort Collins would be a consulting party for that review process. Please provide more information to Maren Bzdek, Senior Historic Preservation Planner, mbzdek@fcgov.com, regarding compliance with this federal legislation to date.

2. The 1041 submittal asserts that the EIS included an evaluation of cultural resources so that potential impacts had been covered in this previous analysis. Given that the Poudre River Intake pipeline was not included in the original EIS, the revised 1041 application should include historic and cultural resource survey information.

3. Please include "Impact to Historic and Cultural Resources" as an evaluation criterion in the Alternatives Evaluation for the Poudre Intake Pipeline.

6. LCLUC 14.10.D(6) (The proposal will not negatively impact public health and safety).

No comment at this time.

7. LCLUC 14.10.D(7) (The proposal will not be subject to significant risk from natural hazards including floods, wildfire or geologic hazards.).

Floodplain Comments

1. A portion of this project is currently located in the FEMA-regulated, 100-year and 500-year Poudre River floodway and floodplain; the 100-year Dry Creek floodway and floodplain; 100-year Boxelder floodway and floodplain and therefore must comply with Chapter 10 of City Code. Any construction activities in the floodplain within the City limits must be preceded by an approved floodplain use permit as required under Chapter

10 of City Code, the appropriate permit application fees, and approved plans. Any construction activities in the regulatory floodway must be preceded by a No-Rise Certification, which must be prepared by a professional engineer licensed in the State of Colorado. Development review checklists for floodplain requirements can be obtained at https://www.fcgov.com/utilities/img/site_specific/uploads/fp-checklist100-2018-update.pdf?1522697905. Please utilize these documents when preparing your plans for submittal.

2. Scour analysis must be performed for any channel crossings as a requirement of 10-27(d)(4) of the City Code.
3. A stability analysis for any proposed development within an erosion buffer zone will be required under Section 10-27(d)(5).4. Please show the boundaries of the floodplain and floodway on site drawings as applicable.

8. LCLUC 14.10.D(8) (Adequate public facilities and services are available for the proposal or will be provided by the applicant, and the proposal will not have a significant adverse effect on the capability of local government to provide services or exceed the capacity of service delivery systems.)

Traffic Operations comments

1. The submittal documents include a traffic review of reservoir construction (long term but temporary), pipeline construction (short term at various locations), and recreational (permanent). The 1041 submittal provided summary information on traffic impacts and referred to the overall detailed evaluation done in the FEIS in Volume 2, Section 4.13.3. The relocation of US287 is not a part of the City's 1041 review.
2. The southern end of the reservoir is about 5 miles from the closest point to the Fort Collins GMA. The newly realigned US 287 will be more than 2 miles from the closest point to the GMA. The pipeline will include locations within the Fort Collins city limits.
3. The document indicates the following regarding traffic impacts:
 - a. For reservoir construction: the construction (2-4 years) will create anywhere from 400 (winter) – 1600 (summer) daily trips with an average of 800. The document notes that construction traffic should utilize 'major' roads for haul routes. For all reservoir construction activities, haul routes should be specified. To the extent feasible, they should not include City roadways.
 - b. For pipeline construction: the construction will include short term disruption (anywhere from 2 to 10 weeks) at locations within Fort Collins city limits. It notes that roadway crossings with paved facilities will be trenchless (bored), while roadway crossings that are non-paved will be open cut. For pipeline construction, early coordination with the City is important especially for construction in the vicinity of major roadways, and approved Work Area Traffic Control (WATC) plans from Fort Collins will be required
 - c. For permanent recreational impacts: identifies access roads and parking lots in vicinity of the reservoir. Anticipated trips related to recreation are estimated to be as high as 1,200 daily vehicular trips in the summer. For future recreational traffic: The City encourages Northern Water to complete intersection evaluations at locations that will be impacted by recreational traffic (such as the intersection of US 287 and CR 21C) for operational and safety improvements. In addition, a

review of potential bike facilities (such as shoulders / paths) between Fort Collins and in / around the vicinity of the new reservoir would be important.

Development Review Engineering Comments

1. The proposed Poudre Intake Pipeline project will be crossing through the Fort Collins city limits. The City would require encroachment permits at right-of-way crossings within the city Limits. The encroachment permit would establish maintenance operations and utility location responsibility within City Rights-of-Way.
2. Northern Water would be responsible for utility location requests associated with the Colorado Revised Statutes.

Water, Wastewater, Stormwater Comments

3. The site disturbs more than 10,000 sq. ft. and/or meets the criteria for a need for Erosion and Sediment Control Materials to be submitted. The erosion control requirements are located in the Fort Collins Stormwater Criteria Manual in Chapter 2 Section 6.0 a copy of the requirements can be found at www.fcgov.com/erosion
4. It is expected the proposed pipelines will maintain standard separation from existing utilities when ultimately designed.
5. It is the understanding of the City's Stormwater Utility that this project will maintain existing grading and drainage patterns and not impede existing drainage.

9. LCLUC 14.10.D(9) (The applicant will mitigate any construction impacts to county roads, bridges and related facilities. Construction access will be re-graded and re-vegetated to minimize environmental impacts.).

No comment at this time.

10. LCLUC 14.10.D(10) (The benefits of the proposed development outweigh the losses of any natural resources or reduction of productivity of agricultural lands as a result of the proposed development.).

Under the Larimer County 1041 Regulations, the decision regarding the 1041 Application rests with the Board of County Commissioners (BOCC). The City respectfully requests that the BOCC consider the City of Fort Collins' review comments when making its decision.

11. LCLUC 14.10.D(11) (The proposal demonstrates a reasonable balance between the costs to the applicant to mitigate significant adverse affects and the benefits achieved by such mitigation.).

Under the Larimer County 1041 Regulations, the decision regarding the 1041 Application rests with the Board of County Commissioners (BOCC). The City respectfully requests that the BOCC consider the City of Fort Collins' review comments when making its decision.

12. LCLUC 14.10.D(12) (The recommendations of staff and referral agencies have been addressed to the satisfaction of the county commissioners.).

Under the Larimer County 1041 Regulations, the decision regarding the 1041 Application rests with the Board of County Commissioners (BOCC). The City respectfully requests that the BOCC consider the City of Fort Collins' review comments when making its decision.



Katie Beilby <beilbykm@co.larimer.co.us>

Fwd: Request for NISP 1041 Permit comment deadline extension

Rob Helmick <helmicrp@co.larimer.co.us>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Thu, Jun 4, 2020 at 2:49 PM

----- Forwarded message -----

From: **Cameron Gloss** <cgloss@fcgov.com>
Date: Wed, May 6, 2020 at 4:26 PM
Subject: RE: Request for NISP 1041 Permit comment deadline extension
To: Rob Helmick <helmicrp@co.larimer.co.us>
Cc: Ryan Mounce <RMounce@fcgov.com>, Jennifer Shanahan <JShanahan@fcgov.com>, Carol Webb <CWEBB@fcgov.com>, Eric Potyondy <epotyondy@fcgov.com>

Thanks, Rob. We appreciate your quick response.

I'll pass this information on to our team and we will get you the comments next week.

Cameron

From: Rob Helmick <helmicrp@co.larimer.co.us>
Sent: Wednesday, May 06, 2020 4:03 PM
To: Cameron Gloss <cgloss@fcgov.com>
Cc: Kelly Smith <ksmith@fcgov.com>; Don Threewitt <threewdl@co.larimer.co.us>; Lesli Ellis <ellislk@larimer.org>
Subject: Re: Request for NISP 1041 Permit comment deadline extension

Cameron,

We have discussed this internally and we can extend the time for response to no later than noon Friday May 15.

On Wed, May 6, 2020 at 1:05 PM Cameron Gloss <cgloss@fcgov.com> wrote:

Rob,

I left you a voicemail about an hour ago on this topic so I'll be redundant here with this message.

The City has prepared DRAFT comments on the NISP 1041 application and also will be having a call with Northern Water on Friday morning to discuss the 1041 and SPAR review schedules and community engagement process.

Given the breadth of our 1041 review comments and the political sensitivity we would prefer to spend a little bit more time refining the comments before sending them to you officially. As we understand the present deadline, our

BCC 08/17/20**NISP**

comments are due this Friday, May 8th. Our request would be to have up to an additional week to get them over to you.

Please let me know at your earliest convenience whether the deadline can be extended by a week and I'll pass on the information to our team and City leadership.

Thanks,

Cameron Gloss, AICP

Long Range Planning Manager

City of Fort Collins

cgloss@fcgov.com

970.224.6174 direct

970.224.6134 fax



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Robert Helmick

Senior Planner

Community Development Department

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LARIMER COUNTY | NATURAL RESOURCES

1800 S. County Road 31, Loveland, CO 80537 | (970) 619-4570 | larimer.org/naturalresources

Memorandum

TO: Rob Helmick, Senior Planner, Larimer County Planning

FROM: Daylan Figgs, Director, Larimer County Department of Natural Resources

DATE: May 15, 2020

RE: Natural Resources Department staff comments on the Northern Water Integrated Supply Project 1041 Land Use Application

Summary

The Department of Natural Resources (DNR) has reviewed information submitted by Northern Water (Northern) related to the Northern Integrated Supply Project (NISP) and offers the following comments and suggested permit conditions for consideration.

Larimer County Natural Resources Master Plans - Background and Summary

The Larimer County Board of Commissioners have adopted both the 2017 Reservoir Parks Master Plan (Parks Master Plan) and 2015 Larimer County Open Lands Master Plan (Open Lands Master Plan). Both plans were used by Larimer County Department of Natural Resource (DNR) staff in their review of the Glade Reservoir Recreation Concept Master Plan and supporting documents submitted as part of the NISP 1041 permit application. The wetland mitigation and wildlife conservation plans were also reviewed in preparation for developing comments.

Parks Master Plan

The Parks Master Plan outlines future activities and recreation development needs at the existing Larimer County-managed reservoir parks (Horsetooth, Carter Lake, Pinewood and Flatiron) and also looks to the future in an effort to identify future recreation needs that meet the growing population in northern Colorado. The County's goals related to reservoir parks is to ensure a system that supports the County's vision, anticipates future growth and recreation demand, ensures a nationally-recognized park system, provides a diversity of recreational experiences, celebrates the natural environment, integrates with a larger recreational network and manages resources in an economically and environmentally sustainable manner.

As stated in the Parks Master Plan, demand for flatwater recreation in the county is high and meeting future demand for similar recreation will be difficult. Currently within the existing Larimer County-managed reservoir parks, there are approximately 10 acres of flatwater-based recreation available for every 1,000 Larimer County residents. When considering population





growth, the Parks Master Plan reported that to maintain this current ratio and level of service, an additional 2,250 acres of flatwater recreation is needed by the year 2040. Glade Reservoir is projected to add 1,600 surface acres to the recreation portfolio. When combined with Chimney Hollow Reservoir (approximately 700 acres), future flatwater recreation demands could be met with the addition of these two reservoirs.

In addition to the water-based recreation opportunities on Glade Reservoir, Northern also proposes land-based recreation opportunities at Glade that are similar to the existing park reservoirs and help achieve several potential recreation activities (camping, trails, picnicking, etc.) listed as “desired” activities in the Parks Master Plan.

Open Lands Master Plan

The Larimer County Open Lands Master Plan is also referenced in Northern’s Recreation Concept Master Plan. The Open Lands Master Plan helps guide the County’s land conservation efforts to specific geographic priority areas. Recreation priorities are also identified and include a focus on trail-based recreation, camping, fishing, water-based recreation, picnicking, and wildlife viewing.

Glade Reservoir is not located within an identified Land Conservation Priority Area as defined in the Open Lands Master Plan but does provide conservation value by helping to establish wildlife habitat and visual buffers on the west side of the reservoir. Northern’s Recreation Concept Master Plan works to meet recreation goals such as trail-based recreation and access for outdoor activities (fishing, wildlife viewing, photography, picnicking, camping, hunting, etc.).

NISP Recreation Concept Master Plan - Background and Summary

The proposed Recreation Concept Master Plan provides a conceptual layout for how recreation facilities and other recreational components can be integrated at Glade Reservoir. The reasoning behind providing a conceptual plan and not a final detailed plan in the application is the recognition of the time between securing permits needed for NISP and the actual opening of the site for recreation. By taking this approach, Northern is allowing for additional public outreach and planning to occur at a future date commensurate with construction of the reservoir and associated recreation amenities. Northern commits to leading this future collaborative planning process to develop a *Recreation Development Plan* that will include layout and design of recreation amenities, prior to reservoir construction that includes the public, Larimer County and NISP participants.

While the exact layout and design of the recreation amenities are yet to be determined, Northern has committed to a wide variety of recreation types that include developed and non-



developed campsites, multi-use non-motorized recreation trails, a visitor and education center, establishment of a cool water fishery, fishing access, motorized and non-motorized boating, developed boat ramps and ADA accessible trails and interpretive overlooks.

Northern has committed to constructing the facilities and other recreation amenities included in the recreation plan as part of the reservoir construction project. The NISP Water Activity Enterprise (WAE) will own all facilities constructed as part of the *Recreation Development Plan* and has agreed to pay the capital improvement maintenance costs for the infrastructure owned by WAE. As proposed, WAE and the County will enter into a 25-year lease agreement for the County to act as the recreation manager at Glade Reservoir. The County shall own all revenue generated as the recreation manager and can determine a recreation fee structure as needed to meet funding needs and WAE will not be responsible for addressing managing revenue shortfalls. WAE will pay for additional site security at Glade Reservoir outside of the *Recreation Management Plan*. Last, Northern Water has proposed it maintains the right to modify a recreation facility design or location at any time if, in its sole discretion, it determines it is necessary to comply with NISP operations or maintenance, NISP permit conditions, or other issue that present a conflict with the primary water supply purpose of the Project.

Overall, the financial commitment by Northern as proposed totals \$21.8M with a request that 25% of this total be provided by the County (\$5.5M) to help support development of the public recreation components of the project. Proposed to be included in the \$21.8M are the recreation commitments set forth in the Fish and Wildlife Mitigation and Enhancement Plan, NISP's purchase of the additional property adjacent to the reservoir to support recreation activities (former KOA site), costs associated with bringing the former KOA site to compliance with County code and regulations, and costs incurred by the parties to develop the *Recreation Development Plan*.

Northern has proposed a method for project funding and accounting that allows the County an option to pay its agreed-upon portion up front or in annual payments once construction commences. Northern will hold the funds in escrow to draw upon for construction of the facilities agreed to in the *Recreation Development Plan*. All numbers referenced in the 1041 application are based on 2019 costs and will require inflationary adjustment.

As noted in the Parks Master Plan, recreation use in Larimer County is expected to increase and adding a new water-based recreation site like Glade Reservoir is a rare opportunity. However, if Larimer County DNR is to manage the site, it is important the recreation plan is implemented to meet recreation demand and operate in a financially sustainable manner while protecting



key natural resource values. In fact, the Parks Master Plan identified the following criteria to evaluate each potential reservoir park partnership:

- Does the property meet demand for public use and diversify recreation opportunities?
- Can enough revenue be generated at the reservoir park to cover the cost of managing recreation and park resources?
- Does the park have valuable natural or cultural resources?
- Does the purchase make additional recreational capacity possible in proximity to existing park and staff resources?
- Is Larimer County the best agency to manage the park?
- Does Larimer County's management increase public access and recreation opportunities or merely divert management from another agency's responsibility?

DNR recommends the following permit conditions:

1. Northern and the County enter into a legally binding agreement that outlines the timeline for the *Recreation Development Plan* to be finalized.
2. Included in the agreement are the financial obligations of each party as outlined in the 75%/25% splits above, and the recreation facilities the parties agree to share and the recreation facilities that are the sole responsibility of Northern and/or the County.
3. The *Recreation Development Plan* must be determined by the County to provide for a diversity of recreation use and at a scale that meets public demand, as well as protect key natural resource values.
4. The County must determine the *Recreation Development Plan* is designed and implemented in a manner to generate the revenue needed to cover the cost of managing the Glade Reservoir recreation and natural resources.
5. The Recreation Concept Master Plan and financial commitment based within are in fact, conceptual and the financial sustainability of the concept plan has not been fully determined. Northern and Larimer County may need to modify their respective financial commitment upon completion of the *Recreation Development Plan* to ensure revenue generated at Glade Reservoir is sufficient to cover the cost of managing the recreation and natural resources. Other funding options include collaborative efforts to secure alternative funding sources through grants and/or donations.
6. The costs included in the 1041 submittal are calculated in 2019 dollars and need to be adjusted to meet present day value at the time of construction.
7. Northern will be responsible to fund all recreation amenities required as a condition of permit approval by other public agencies. This includes but is not limited to recreation commitment actions and strategies of the NISP Fish and Wildlife Mitigation and Enhancement Plan (FWMEP), including the identified Glade Reservoir Recreation and



Wildlife Adaptive Management Program. These prior commitments are separate and independent from any consideration made in the 1041 review process.

8. If Northern modifies a recreation facility design or location agreed to in the *Recreation Development Plan* to comply with NISP operations or maintenance, Northern will be responsible for payment of lost revenue to the County if the modification is temporary and for payment of lost revenue to the county and replacement of the facility in-kind if the change is to be permanent.

Camping and Campgrounds Summary

Northern has proposed a camping experience at Glade within a 170 acre recreation area that ranges from developed campsites that support recreational vehicle (RV) camping, tent camping in developed sites to hike-in camping in more remote sites. A series of campgrounds that support between 120-150 campsites are identified in the conceptual layout of the site. Recreation trails are shown throughout the site connecting the various camping experiences with the reservoir, visitor and education center and other amenities such as interpretive loops and ADA accessible trails. In addition, showers, restrooms and camping related amenities are included as part of the recreation plan.

DNR recommends the following permit conditions:

1. Northern will construct as part of the *Recreation Development Plan* the on-site storage and distribution systems for potable water, and on-site wastewater treatment facilities as appropriate for anticipated recreation and administrative facilities.
2. Provide a minimum of 150 campsites with the final configuration of number and type of campsites, restrooms, shower houses and other facilities based on the ability to meet public demand, diversity of experience and the ability to cover management costs with revenue generated from the Glade Reservoir site.

Other considerations:

1. The County may require improvements to roads to support safe access to recreation facilities or for other purposes. Any transportation improvement funded as part of the *Recreation Development Plan* will be limited to transportation upgrades solely required to support recreation use.

Boating and Water-based Recreation Summary

Northern has proposed water-based recreation activities including motorized and non-motorized boating (including hand launch craft such as kayaks and stand up paddleboards) and fishing. To provide watercraft access to the reservoir, Northern has proposed boat ramps to be located on the east embankment. While the boat ramp length has not been finalized, Northern



provided information to indicate that a boat ramp with a length of 520' will provide access when the reservoir is at 50% capacity or greater (90% of the time); a ramp 370' in length will provide access to the reservoir when it is at least 60% capacity (80% of the time). Northern also proposes boat trailer parking near the east abutment of the dam along with other improvements that include restroom/shower building, rental or concession building and fishing piers with accessible parking and trails.

Glade Reservoir at full capacity is approximately 1,600 surface acres, slightly smaller than Horsetooth Reservoir. By comparison, at Horsetooth Reservoir the county provides 360 boat trailer parking spaces. In addition, the Inlet Bay Marina provides access for an additional 300 vessels that are kept on slips and mooring balls, bringing the total boat access capacity to 660 vessels.

Northern outlines a key component to effectively managing motorized and non-motorized recreation is to create distinct boating management zones within the reservoir. Glade's unique natural topography, creates two valleys in the reservoir, making it conducive to designating one valley for motorized and the other for non-motorized boating.

DNR agrees the location and length of the boat ramps need to be designed in a manner to reach water levels in nearly all occasions. With this in mind, DNR recommends that of the four ramps proposed at Glade, at least two be at a length to reach boatable water 90% of the time (currently proposed at 520') and two be at a length to reach boatable water 80% of the time (currently proposed at 320').

In addition, staff recommend that access be provided to the right abutment (west side of the reservoir) for hand launch craft. This would allow for separate and safe entry for all boating types and creates the ability to separately manage the west side of the reservoir for wakeless boating. Specifically, this separate hand launch area avoids the safety issue of hand launch craft crossing the dam face of the reservoir to access the west side managed for wakeless activities. Providing two separate boat launch locations will help delineate to the boating public where wake and wakeless boating are allowed. Facilities constructed to support hand launch craft should provide similar quality and water level access to the reservoir as the trailer launched boat ramp. DNR staff recognize this request will need to be presented to the Colorado Parks and Wildlife for consideration relative to the approved 2017 CPW Fish and Wildlife Mitigation and Enhancement Plan.



DNR recommends the following permit conditions:

1. Based on the size of Glade and expected demand for trailered boat access, provide a minimum of 200 trailer spaces on land to support boat access on the east abutment.
2. Northern work with Colorado Parks and Wildlife to allow access to the west abutment for hand launch watercraft and a parking area with a minimum of 100 spaces for hand launch (non-trailered) watercraft and access to the trail and public lands located along the west side of the reservoir. If allowed by CPW, this component will be added to the *Recreation Development Plan*.
3. At the east abutment, construct at a minimum, 2 boat ramps of sufficient length to access boatable water 90% of the time, and two ramps of sufficient length to access boatable water 80% of the time. Northern has proposed the lengths to accomplish this goal to be 520' and 370', respectively.
4. Construct 2 Aquatic Nuisance Species inspection stations and 1 decontamination area in appropriate locations as determined in the future *Recreation Development Plan* as part of the boat ramp design and construction.

Other considerations:

1. Northern work with the County to establish a marina if needed to expand boating opportunities at Glade Reservoir. The marina may be by concessionaire or managed by the County.

Trails and Day Use Activities Summary

Northern proposes a series of trails be designed as part of the *Recreation Development Plan* that support a variety of uses and abilities including a focus on ADA compliant trails where feasible in the less-steep terrain. Natural surface trails to support trail-based recreation and fishing access are proposed for the east and west sides of the reservoir. Additionally, a series of trails that connect the recreation area, visitor center, interpretive areas and the reservoir are shown in the conceptual layout of the site. Careful consideration is being made to provide access to and within the recreation area in compliance with Americans with Disabilities Act (ADA) as feasible and specific ADA components are proposed for the interpretive areas, trails around the visitor center, campsite areas and reservoir waterfront.

Day use areas are not clearly identified but recreational activities considered in this category of use are provided in the conceptual plan. These include trail-based activities, picnicking, water-based activities, fishing access and non-trail based recreation (wildlife viewing, etc.). Parking to support day use activities is not clearly identified in the concept plan but is expected to be a substantial need and would be additional to the recommended boat parking spaces.



A 125-145 space parking area to support Poudre Canyon recreation is required by the approved Fish and Wildlife Mitigation and Enhancement Plan (FWMEP). Northern proposes this to be outside of the Glade Reservoir area. The FWMEP requirement for this parking area is to be a “reduced fee area”.

DNR recommends the following conditions:

1. Provide a minimum of 350 day use parking spaces within the Glade Reservoir fee area that includes at least 100 spaces at the west abutment to access the west side trail and hand launch boating area.
2. Provide a minimum of 30 day use parking spaces on the north end of the reservoir to support access to the reservoir and trails.
3. Locate the FWMEP “reduced fee” lot away from the Glade Reservoir entrance but include this parking area in the overall *Recreation Development Plan*, but the construction, replacement and maintenance of this parking lot will be at the sole expense of Northern.
4. Larimer County manages, sets fees and collects all revenue generated from the Poudre Canyon “reduced fee” lot as part of the *Recreation Development Plan*.

Open Space and Environmental Considerations

The NISP project is subject to multiple federal, state and local regulatory approvals related to environmental impacts. As such, DNR comments on this subject matter are primarily intended to ensure communication and coordination prior to and during the mitigation processes.

The 2015 Larimer County Open Lands Master Plan identifies priority land and river conservation areas and activities for the Department of Natural Resources. Glade Reservoir is not located within an identified Land Conservation Priority Area as defined in the Open Lands Master Plan but does provide conservation value by helping to establish a wildlife habitat and visual buffers on the west side of the reservoir.

Staff has reviewed the wetland mitigation plan and the wildlife conservation plan and recommends the following permit conditions:

Wetland Mitigation Plan

DNR recommends the following permit conditions:

1. Infrastructure and construction activities will comply with setbacks from wetlands and/or sensitive vegetation or wildlife communities required in the most current Larimer County Land Use Code.



2. Larimer County will have an opportunity to review and comment on the Wetland and Open Water Mitigation Plan that is currently in the draft phase.
3. The maintenance and monitoring plan prepared for USACE for evaluating post-project wetlands and outlining measurable goals and objectives shall also be shared with Larimer County.
4. Northern will be fully and financially responsible for any adaptive management activities or corrective actions necessary to meet the objectives of the maintenance plan.
5. Wetlands created for this project will be assessed using the FacWet method. Scores shall meet or exceed the scores of the impacted wetlands and strive for Reference Standard condition.
6. Plantings and/or seed mixes used to establish wetlands, riparian or upland habitat shall conform to adopted Larimer County specifications and be reviewed and approved by Larimer County prior to installation.
7. The FEIS describes approximately 50 acres of wetland inundation at the proposed reservoir site yet the wetland mitigation plan submitted in this application indicates plans to mitigate 31 acres. A clarification of the discrepancy is requested. In absence of clarification, the larger mitigation acreage will be required.

Other considerations:

1. Section 8.2.5 *Wetland definition*, states "The desktop analysis and field verifications likely overestimated potential wetland and open water areas". Staff requests clarification on the reason for this assumption.

Wildlife Conservation Plan

DNR recommends the following permit conditions:

1. Continue to include Larimer County in the development of the stream channel and habitat improvement plan for the Cache la Poudre River.
2. Consult with Larimer County DNR regarding land conservation around Glade Reservoir. This land conservation effort is outlined in the FWMEP, as a responsibility of Northern's to offset the permanently impacted acreage of the reservoir site.

Other considerations:

1. Northern outlined commitments made in the FWMEP and 2018 NISP Final Environmental Impact Statement (FEIS) Conceptual Mitigation Plan (CMP) that provide complementary benefits to recreation along the west side of Glade Reservoir. Northern is clear these commitments are separate from the Recreation Concept Master Plan




funding commitments. Larimer County DNR requests to be included in the development of these plans.

Thank you for the opportunity to comment on the Northern Integrated Supply Project 1041 Permit Application. Please feel free to contact me with any questions you may have.

Sincerely

Daylan Figgs
Director
Larimer County Department of Natural Resources

TO: Rob Helmick
Larimer County Planning Department

FROM: Lea Schneider 

DATE: May 11, 2020

SUBJECT: Northern Integrated Supply Project, 1041 Permit; 20-ZONE2657

Northern Integrated Supply Project Water Activity Enterprise (NISP WAE) is requesting a 1041 Permit from Larimer County for a proposed water storage and distribution project (NISP) that will supply 15 Northern Front Range water providers with 40,000 acre-feet of water. Before the 1041 Permit request, extensive permitting processes were required by other regulatory agencies including the Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers (Corps).

The Corps released the final Environmental Impact Statement (EIS) for NISP in 2018, which evaluated the direct, indirect and cumulative environmental impacts of the proposed alternatives for the water supply project. Numerous studies were conducted with input from federal, state and local agencies, as well as private industry and the public to address potential impacts. The final Record of Decision has not been completed by the Corps at this time.

The Larimer County Health Department has reviewed the documents provided by NISP WAE for the County's 1041 Permit process and referenced the EIS and supporting studies. For the 1041 Permit application as a referral agency, the Health Department comments will focus on environmental public health for the construction and operation of the project within unincorporated Larimer County.

The comments are laid out by the proposed projects of development in unincorporated Larimer County. A description of each project is provided with discussion, followed by recommended conditions of approval.

1. Glade Unit and Reservoir (referred to as Unit)

The Glade Reservoir Unit as described in the *Larimer County 1041 - Utility Descriptions Memo*, (February 14, 2020), includes an expansion of the existing Poudre Valley Canal

(PVC) for passive delivery to a forebay reservoir. A Control Gate Structure will be constructed to control flow to the existing portion of the PVC downstream of the forebay. The existing PVC Diversion Structure will be demolished and rebuilt. A portion of the existing Munroe Gravity Canal alignment will be inundated by Glade Reservoir and replaced by the Munroe Canal Bypass (MCB), a conduit and several control structures that will convey flow beneath the reservoir. The Glade Unit also includes the Glade Pump Station, which will pump water from the forebay into Glade Reservoir; the Electrical/Control building that will distribute power throughout the site and provide control of the various hydraulic features; the Surge Building that will house surge tanks to protect the pump station discharge conduit; and numerous buried conduits with control valve vaults that connect these facilities. It is understood that NISP WAE would retain ownership and operational responsibility once NISP is completed.

The design of the facilities has not been finalized so the information provided in the application is a preliminary overview. Information could not be located in the documents regarding backup generators for the electric pumps and their proposed power supply nor discussions about hydropower. Per the *EIS Conceptual Mitigation Plan, Chapter 5*, NISP would investigate hydropower opportunities at the Glade forebay to offset greenhouse gas emissions from power plant generated electricity. Hydropower power aside, the *Utility Descriptions Memo* indicated that Xcel Energy would provide power to the site through an interconnection request with Tri-State Generation & Transmission. Tri-State recently presented their *Responsible Energy Plan*, pledging to increase their renewable energy sources by 50% in 2024, and close all coal generating plants in Colorado by 2030 to support Colorado's aggressive greenhouse gas emission rulemakings.

The Health Department is requesting that a Site Plan Review or equivalent be required for the applicant prior to starting construction. This additional review would allow NISP to provide additional information on the Unit for the County to ensure proposed improvements to existing infrastructure, site development, utilities, and compatibility with the rural area. Information should also include plans for removed residences and associated utilities. Some of the residences may contain asbestos and require abatement before demolishing the structures. We would also request the applicant to communicate with the Division of Water Resources regarding proper abandonment for wells on properties that will be inundated as part of the reservoir.

As part of the Site Plan, we request that the applicant demonstrate compliance with residential noise standards of the Larimer County Noise Ordinance during operation of the final design of the Unit infrastructure by submitting a noise analysis. Construction activities associated with the Unit and infrastructure are also required to meet the construction noise standards of the Ordinance with mitigation strategies provided at the Site Plan review application. This Noise Mitigation Plan shall include strategies to control noise and establish a means of communication to share information between the community, NISP and the contractors. Noise mitigation strategies for the plan should include the use of maintained equipment, white noise back-up beepers, limited hours of operation, vibration dampening devices, quiet design generators/generator housing, etc. If blasting is to occur as part of this project, the County staff and residences shall be notified and the allowed hours of the activity restricted to day time (7am – 7pm).

Documentation demonstrating application with the Colorado Air Pollution Control Division (APCD) for the appropriate construction permits and Fugitive Dust Control Plan shall also be provided at the time of Site Plan. APCD will require dust control from all construction activities, storage and handling of materials, haul roads, haul trucks, demolition activities, and blasting. Depending on the extent of the land disturbance, there may be a requirement for an engineer analysis of emissions to enforce strict controls. Please note that individual pieces of equipment may also require permitting for emissions such as diesel generators, material crushers, and welders. Larimer County Health Department is a contracted agency with the APCD and will periodically inspect the construction sites and investigate complaints to ensure compliance with the permits and plans.

Per the EIS, construction emissions for the preferred Alternative 2M would have short-term impacts on regional air quality for all construction activities associated with the buildout of NISP. Several controls will be required to control particulate matter during the construction phases per the required APCD permits, but little was discussed about other emissions like nitrogen oxides (NOx) related to non-road vehicle emissions. Federal emission standards for mobile on-road and nonroad vehicles and engines are regulated by the Environmental Protection Agency and not regulated under the APCD stationary source construction permitting. With the recent serious-nonattainment reclassification for the Front Range, we would recommend creating an Air Quality Mitigation Plan (AQMP). An AQMP would identify ways NISP will commit to reduce emissions through best practices for NISP contractors during the construction of the entire water supply project. One of the more common best practices for industry would be limiting specific operations during Air Quality Action Advisory/Alert Days posted by the Colorado Department of Public Health and Environment (CDPHE) for the Front Range area. The AQMP could outline how alerts are received, outline specific emission reduction measures, and include requirements for documenting the measures implemented. Other operational measures for the plan could include use of alternative fuel fleet vehicles and equipment, ensuring a certain percentage of construction nonroad engines and equipment are newer and meet the highest EPA emission standards, contracting with vendors/subcontractors that use sustainable practices and renewable energy sources, commuting to the job site, reducing on-site truck traffic and engine idling, delaying vehicle refueling, suspending or delaying use of fossil fuel powered equipment, limiting construction and other operations with high potential to emit NOx and other emissions.

The Glade Unit forebay reservoir is located near the historic F.E. Warren Missile Silo which used trichloroethylene (TCE) to flush the fuel tanks after missile readiness tests. Per the 2018 EIS, the Corps investigated the extent of the TCE-contaminated groundwater plume starting in 2003 before beginning remediation. Monitoring wells were continually sampled through 2015 demonstrating the successful decline of the plume. Sample results in the Corps' *Final Semi-Annual Performance Monitoring Report* (December 2015) demonstrate that TCE concentrations in groundwater are less than the Maximum Contaminant Levels of 5 micrograms per liter (µg/L) and in compliance with the EPA's Primary Drinking Water Regulations. The EIS has published their responses to comments regarding the TCE plume and indicated it is unlikely that the former TCE plume would adversely impact the proposed Glade Forebay construction or operation, and unlikely that the change in hydraulic conditions under operation would

adversely impact the remedial efforts being conducted to treat the TCE plume. To be proactive, we would recommend a Private Well Water Monitoring Plan conducted by a third party agency and funded by NISP. Private well water would be tested before construction to gather baseline data of water constituents, with continuous sampling through construction and operation of the Glade Unit til a decided end time. The plan would also have to describe remediation in the event TCE was detected in the private well water over the years.

Glade Unit and Reservoir Conditions of Approval:

- a) Require a Site Plan Review or equivalent for the refined design of the Glade Unit infrastructure including information and plans for the expanded PVC, forebay, Glade Pump Station, Electrical/Control building, Surge Building, buried conduits, utilities (including power supply, water lines and septic system components), and other application requirements of the Site Plan application.
- b) A Site Plan Inventory Map shall be provided for private and public utilities (propane, wells, septics, etc) for properties adjacent to any construction activities and properties of the Glade Unit and Reservoir.
- c) A predictive noise analysis shall be provided for the refined design of the Glade Unit to demonstrate compliance with residential levels of the Larimer County Noise Ordinance during operation. This would include full-site operation including pumps, spillway and diversions.
- d) Construction noise levels shall comply with the Larimer County Noise Ordinance with any exceptions to be evaluated by Larimer County.
- e) A Noise Mitigation Plan shall be provided for the construction of the Glade Unit and supporting infrastructure.
- f) Documentation demonstrating compliance with the Colorado Department of Public Health & Environment Air Pollution Control Division (APCD) construction permitting process shall be provided. This would include the appropriate APCD applications, any required emissions analysis and the Fugitive Dust Control Plan for dust mitigation during construction.
- g) Air Quality Management Plan shall be provided for construction demonstrating how emissions from equipment and mobile sources not operating under APCD permits shall be minimized.
- h) Private Well Water Monitoring Plan shall be provided conducted by a third party agency and funded by NISP.

2. Recreational Uses

NISP WAE is proposing to allow recreation on Glade Reservoir by dedicating and developing a 170-acre recreation area which will include the existing KOA Campground to be managed by Larimer County Department of Natural Resources. A *Recreation Concept Master Plan* has been developed which includes amenities for powered to low-powered and non-motorized watercraft, fishing, camping (tents, recreational vehicles with hookups), multi-modal trail systems, shower facilities, concessions, restrooms, a visitor/education center, parking for Poudre Canyon users. The site could also include recreation maintenance facilities for Larimer County. The 2017 Reservoir Parks Master Plan identified the need for increased recreation capacity based on projected population growth and current parks experiencing capacity during peak summer months.

Potable water will be provided from the West Fort Collins Water District. Discussion during a virtual meeting on April 10, 2020, also indicated that raw water may also be utilized from the reservoir which could be treated, stored and distributed on the site. Please note that water treatment, storage and/or distribution systems shall be reviewed and approved by the CDPHE Water Quality Control Division. The hauling of treated water would not be a viable option. Information on the potable water system design shall be provided at Site Plan application as the recreational uses and design are finalized.

Wastewater disposal for the recreation area will be by on-site wastewater treatment systems. There are existing OWTS serving the KOA Campground. Septic system design and location will be based on the type of use and minimum setbacks from surface water, water lines, and other septic systems to reduce areas of influence on groundwater. Please note that septic systems with a daily flow of 2,000 gallons per day or more are required to undergo effluent and design review by the CDPHE Water Quality Control Division. Information on the wastewater system designs shall be provided at Site Plan application as the recreational uses and design are finalized.

A predictive noise analysis and mitigation plan have not been completed at this time nor were any proposed. Though this area is rural, there are residences in the area that may be impacted by multiple motorized crafts and their sound systems. Rural areas experience a lower ambient noise level compared to urban areas which results in noise disturbances to be perceived louder. Enhanced camping and boating around Carter Lake has increased noise levels, but the Health Department has only received two complaints from neighboring residents. The Carter Lake area is also more densely populated. Preliminary management plans for the reservoir suggest strategies for noise mitigation such as designating portions of the reservoir for certain water recreation and restricting night boating to protect nearby residents. This is insufficient information to make an informed decision. It would be important to demonstrate how the noise from recreational uses including boating and camping will travel to the residential receptors in the area. From the analysis, it is then possible to determine what mitigation would be necessary, if any at all.

Recreational Uses Conditions of Approval:

- a) Require a Site Plan Review for the refined design for the recreation area of Glade Reservoir. The application material shall include information and plans for the amenities, supporting infrastructure (including potable water supply and

wastewater systems), and other requirements of the Larimer County Site Plan application process.

- b) A Site Plan Inventory Map shall be provided for private and public utilities (public and private: propane, wells, septic, etc) in the area of the recreational site and on properties adjacent to any construction activities and recreation areas of Glade Reservoir.
- c) A predictive noise analysis shall be provided which is based on the final design of the recreation allowed on the reservoir to demonstrate compliance with residential noise standards during operation.
- d) A Noise Mitigation Plan shall be provided that outlines the strategies that will be implemented to prevent noise disturbances to adjacent residences recreation.
- e) A Noise Mitigation Plan shall be provided for the construction of the recreation area.
- f) Documentation demonstrating compliance with the Colorado Department of Public Health & Environment Air Pollution Control Division (APCD) construction permitting process shall be provided. This would include the appropriate APCD applications, any required emissions analysis and the Fugitive Dust Control Plan for dust mitigation during construction.
- g) An Air Quality Management Plan shall be provided for construction activities demonstrating how emissions from mobile sources not operating under APCD permits shall be minimized.

3. Conveyance Piping

Raw water would be delivered from Glade Reservoir to the County Line Pipeline using two mechanisms. The Northern Tier Pipeline would deliver water directly from Glade Reservoir to the County Line Pipeline. The second mechanism would deliver water from Glade Reservoir directly to the Poudre River at the entrance to the canyon through the Glade Release Pipeline. This water would then travel 13 miles down the Poudre River to another pump station located upstream of the City of Fort Collins' Mulberry Water Pollution Control Facility (MWPCF). The pump station will then send raw water through the Poudre Intake Pipeline to the County Line Pipeline.

The above is just a preliminary overview of the preferred Alternative 2M evaluated in the EIS. A Route Alternatives Analysis for various pipeline routes within Larimer County was provided as part of the 1041 Permit application. The Health Department does not have preference for the conveyance as all will have impacts to the environment that will need to be addressed during construction and receive proper remediation after construction. It is understood that the County Engineering Department will be overseeing the water quality aspect of sediment and stormwater in regards to construction and has requested the supporting plans and permits for protecting water quality. In addition, Engineering is asking for further pipeline location and design

review/construction and access plans prior to construction. The Health Department would support this request as there are several waterways, roads, utilities, private properties and residences along all of the routes that would be impacted by the project. Specific information addressing these impacts and mitigation measures will need to be provided either as part of this review. In addition, sections where the pipeline may be installed within easements of private residential properties have the potential to impact public utilities, private wells (very low) and septic systems. A thorough investigation shall be conducted to locate the lesser known private utilities prior to construction on or near residential properties. Residents will also need to be notified for planned, short-term public utility service disruptions. If not already in place, we would also recommend an Emergency Utility Plan be developed for accidental utility disruptions for residents that are not short-term making it difficult to endure normal activities at home due to loss of utilities for heat, cooking, showering, drinking water, medical devices, etc. This could involve temporary utility replacements (generators, water tanks, etc) or temporary housing/accommodations. In the event that utilities (including septic systems, wells) are damaged during construction activities, the applicant will be responsible for immediate repair/replacement and all associated costs to prevent extended disruption of the property owner's quality of life.

Conveyance Piping Conditions of Approval:

- a) Require a Site Plan Review or equivalent (pipeline location and design review/construction and access plans) for the final design of the pipeline and construction corridors.
- b) Site Plan Inventory Map shall be provided for all public and private utilities (propane, wells, septic, etc) for properties adjacent to any construction activities.
- c) Emergency Utility Plan that outlines temporary utilities or alternative accommodations in the event of construction damage to utilities.
- d) NISP WAE and/or contractors shall be responsible for immediate repair/replacement of damaged utilities (public and private) and all associated costs experienced by properties.
- e) Construction noise levels shall comply with the Larimer County Noise Ordinance with any exceptions to be evaluated by Larimer County.
- f) Construction activities in the presence of residential properties shall not occur outside of the 7am-7pm. Exceptions for time-sensitive tasks shall be evaluated by Larimer County.
- g) A Noise Mitigation Plan for the construction of the conveyance pipelines and associated corridors shall be provided to demonstrate compliance with construction noise levels.
- h) Documentation demonstrating compliance with the Colorado Department of Public Health & Environment Air Pollution Control Division (APCD) construction permitting process shall be provided. This would include the appropriate APCD

applications, any required emissions analysis and the Fugitive Dust Control Plan for dust mitigation during construction.

- i) An Air Quality Management Plan shall be provided for construction demonstrating how emissions from mobile sources not operating under APCD permits shall be minimized.

4. Highway 287 Realignment

Highway 287 will have to be relocated as 7 miles of the Highway are to be inundated by the Glade Reservoir. This section of Highway is proposed to be relocated to the east aligned along an abandoned haul road for the former Holcim cement plant mining operation. NISP WAE is currently developing the preliminary and final design of the roadway alignment in coordination with the Colorado Department of Transportation. As with other projects, the highway realignment will require permitting and controls for air and water quality protection during construction. In addition, CDOT is responsible to assure that local noise ordinances are observed by the contractor. For this reason, noise mitigation plans shall be provided to Larimer County to ensure compliance with our local ordinance.

Part of the approval process for evaluating a highway project is the impacts of traffic noise and therefore require a noise assessment. As part of the assessment, sensitive receptors are identified and current noise levels are measured. These measurements are then used to calculate predicted future design-year levels based on traffic projections. If there is a substantial increase between existing noise levels and the predicted design-year levels, then noise abatement measures must be considered and evaluated for those receptors. A noise assessment for this project was conducted once in 2006, but then updated (*Noise Impact Analysis Results Northern Integrated Supply Project – US 287 Relocation Study*, January 2014) to reflect a design-year of 2035. The noise assessment concluded that no noise mitigation would be necessary as there was no substantial increase between existing and predicted decibels. Receptors along the new alignment would experience a 1 decibel increase, while several receptors that are currently on Hwy 287 will decrease by 3-5 decibels with the change in Hwy 287 traffic. Rose Waldman and Keith Wakefield, both staff of CDOT, compared the proposed Highway 287 realignment from 2014 and the most current alignment and determined that the noise analysis still applies and will not be required to be modified at this time.

Highway 287 Realignment Conditions of Approval:

- a) Highway 287 Construction noise levels shall comply with the Larimer County Noise Ordinance with any exceptions to be evaluated by Larimer County.

PROJECT MEMORANDUM

TO: Rob Helmick, Senior Planner and Northern Water Conservancy District,
Applicant/Owner

FROM: Juan Mancha, Lead Plans Examiner

DATE: May 19, 2020

RE: Northern Integrated Supply Project (NISP) 1041 {20-ZONE2657}

This memo is to make note of preliminary concerns or requirements associated with the above named project at time of Minor Special Review submittal only. No direct response is required at this time, unless specifically required in the individual items below. {*The 2018 International Codes are adopted and enforced by Larimer County.*}

Below are typical comments and code sections that may be encountered with your project.

1.) Larimer County is under the 2021 International Building (IBC) and other codes. A building permit is required for all new structures, additions or alterations to, or change of occupancy of existing structures on the property concerned. All plans submitted for the required building permits shall be prepared and wet stamped/sealed by a Colorado Licensed Architect and Colorado Registered Engineers (Structural, Mechanical, Etc.). Planner, please provide new commercial building permit submittal requirements handout to applicant.

2.) Applicant/owner needs to contact the Fire Department having jurisdiction as well for information on Fire Code requirements on the proposed project.

3.) This structure will need to either be fully sprinkled or divided up with 1-hour fire rated assemblies such that no one area exceeds 5,000 square feet per a local code amendment.

4.) A licensed Larimer County Class A or B General Contractor is required to obtain the permit.

5.) All electrical work requires a permit from Larimer County for all campsite electrical hookups and all proposed structures.

- 6.) Plans will need to demonstrate that all trails will need to meet accessibility requirements per the adopted IBC and ANSI standard.
- 7.) A permit and engineered plans are required for all tent pads at the campsites.
- 8.) A permit and engineered plans are required for the accessibility pier, restroom, and all concession structures.
- 9.) Per the adopted IBC, accessibility restrooms are required along the trails and within 500 feet of the campsites.
- 10.) A permit and engineered plans are required for the proposed entry station. The entry station will need to be accessibility.
- 11.) All interpretive plazas must show compliance with accessibility requirements. To include the requirements for the hearing and seeing impairment public per the 2021 IBC and the referenced ANSI standard.

If you have any questions please feel free to contact me by reply email or by phone at (970) 498-7665.

COMMERCIAL PLAN SUBMITTAL INFORMATION

2018 International Codes adopted and enforced

The following information/plans will be required for full plan submittals for Building Division review. Please read all items over very carefully:

Plans are to be stamped by a Colorado Licensed Architect **and** Colorado Registered Engineer(s).
 All plans shall be drawn to scale, such as 1/4"=1' or 1/8"=1'. Maximum paper size accepted is 24" x 36".
 Notations or markings in **red-ink** are prohibited; "**red-lines**" are only for Building Division review notes and corrections.

1. At least 7 sets of the Site Plan. Show distances from building to property lines, roads, waterways and other structures on same site. "Approved" site plans will be required on most Commercial projects. No aerial photos will be accepted.
2. Three sets of floor plans for each level. Indicate uses of all rooms or areas on floor plans.
3. Two sets of building section details showing all components of construction from bottom of footing to top of roof.
4. Two sets of all wall framing/assembly details, showing all parts of the wall assemblies.
5. **Design block (or Code Analysis)** must be on all Commercial plans. Show Occupancy Classification, Type of Construction, indicate fully sprinkled or non-sprinkled, square footage of each level and provide calculations showing the building area is in compliance with International Building Code requirements & exceptions. **The wind speed design must comply with the adopted Larimer County Ultimate/Basic Wind Speed Map.**

*****Energy Code Compliance Requirements*****

An **Energy Code** Compliance Report prepared by the designing/project architect shall be provided as a part of the plans submittal for building permit. The structure must be designed to comply with either ANSI/ASHRAE/IESNA 90.1 or Chapter 4 [CE] and applicable tables for Climate Zone 5 of the 2018 International Energy Conservation Code (IECC). A COMCheck energy code analysis of the structure will be accepted as part of the required compliance report. (COMCheck is a three-part report: Building Envelope, Mechanical & Electrical).

An Air Leakage Test is required on all new structures and large additions.

The following items shall be addressed in the required Energy Code Compliance report in addition to the items noted above:

- Electrical Power & Lighting Systems shall indicate specific compliance with Section C405 of the 2018 IECC.
- Buildings shall comply with at least one of the following 2018 IECC Section C406.1 options;
 - a. Efficient HVAC performance in accordance with Section C406.2;
 - b. Reduced lighting power density in accordance with Section C406.3;
 - c. Enhanced lighting controls in accordance with Section C406.4;
 - d. On-site supply of renewable energy in accordance with Section C406.5;
 - e. Provision of a dedicated outdoor air system for certain HVAC equipment in accordance with Section C406.6;
 - f. High-efficiency service water heating in accordance with Section C406.7;
 - g. Enhanced envelope performance in accordance with Section C406.8;
 - h. Reduced air infiltration in accordance with Section C406.9.

Note: Individual Tenant Spaces shall comply with Section C406.2, C406.3, C406.4, C406.6 or C406.7 unless documentation is provided that demonstrates the entire building is in compliance with Section C406.5 – 2018 IECC.

*****Section C408 – 2018 IECC requires HVAC, Service Water Heating and Electrical Systems to be commissioned in accordance with Sections C408.2 and C408.3 – 2018 IECC. Final Commissioning Reports shall be provided to the Building Department and the Building Owner in compliance with each section. (**New structures not exceeding 15,000 sq. ft. in floor area, additions and alterations are exempt from commissioning requirements.)***

6. Two sets of floor and roof framing plans. Show all header and beam sizes, spacing, span and type of joists and rafters. Include engineered floor and roof truss layouts if trusses used. **Indicate all design loads used.**
7. Two sets of section through stairway, detail plans showing rise, run, headroom, graspable handrails and their extensions.
8. Two sets of engineered foundation plans with section details indicating reinforcement and anchor bolts, design information, etc. **Indicate all design loads used.**
- 9.* Two sets of detail drawings of all fire wall assemblies and listing number of such assemblies.
* See "Special Note" on next page. **All such assemblies require full inspection.**
- 10.* Two sets of detail drawings of all roof/ceiling or floor/ceiling fire-rated assemblies and listing number of such assemblies.
* See "Special Note" on next page. **All such assemblies require full inspection.**
11. Two sets of HVAC plans showing all duct sizes, fire/smoke damper locations (if required), BTU's of all appliances. Show locations of all HVAC units and water heaters and provisions for outside combustion air. Indicate on plans how outside air and ventilation requirements will be satisfied.
12. Two sets of plumbing plans showing size of piping (DWV), fixture and clean-out locations; indicate type of materials to be used.
13. Two sets of gas piping plans showing sizes and length of runs for all gas piping. Provide a list of BTU's of appliances connected thereto.
14. Two sets of building elevation plans showing all sides.
15. Two sets of ceiling plans showing all Exit signs locations and provisions for Exit Illumination. (These items may be shown on floor plans, if so desired.)
16. Two sets of complete door hardware and window schedules.
(Sizes of all doors and windows and complete door hardware listings required.)
17. Two sets of room finish schedules (floors, walls and ceilings).
18. **For engineered steel buildings only:** Provide two sets of wet-stamped building plans or two wet-stamped Design Certification letters from the steel building manufacturer certifying that the building will comply with Larimer County Wind and Snow loading requirements. Also provide anchor bolt setting plans with the size, diameter and embedment depth of the anchor bolts called out. **These are required in addition to the other requirements listed above.**
19. **For footing and foundation only permits, provide:**
 - (1) Two sets of engineered footing and foundation plans with sections and design information including soils report number and soils engineering firm.
 - (2) Two sets of underground plumbing plans.
 - (3) Site plans and other information as noted in item # 1 of this handout.
 - (4) Design Block as noted in item # 5 of this handout.
20. If **kitchen hoods** are part of your project, the following is required in addition to above items:
 - (1) Two sets of plans for the hood. For Type I hoods, provide two sets of fire extinguishing system plans.
 - (2) Two sets of plans for the hood, duct and shaft. For Type I hoods, provide detail plans of shaft and listing number for the minimum 1-hour fire rating of the shaft.
21. **For woodworking businesses,** provide two full sets of engineered plans and calculations for the entire dust collection system. See Dust, Stock and Refuse Conveying Systems provisions of the 2018 International Mechanical Code, as well as the 2018 International Fire Code. Dust collection systems must be interlocked with all dust producing machines.

22. **For Tenant Finish projects in “strip mall” or Condominium situations**, provide a “Key Plan” showing the location of the tenant space being finished in the building **AND** the occupancy groups of the tenants on each side and above or below the space being finished.

***Special Note concerning items 9 & 10 above:** Details of how penetrations in fire rated assemblies are to be protected are required, along with the listing number of the material or system to be used, per 2018 IBC Section 107.2.2. Approval of such systems or materials is required prior to use of such materials or systems. **All such assemblies require full inspection.**

GENERAL NOTES:

- A) Specialty plans, such as those indicated in items 20 & 21 of this handout, are required on items that are not typical of all types of commercial construction, such as Spray Painting operations using flammable finishes which need approved paint booths and mixing rooms.
- B) Toilet room “blow-up” details are always good to verify that accessibility requirements are met.

This handout is not intended to be all-inclusive, merely to give a good basic outline of plan submittal requirements.

APPROVALS FROM OTHER AGENCIES ARE REQUIRED:

Fire Department Review and Approval:

The applicant for Building Permit must take **two sets** of plans for the project to the Fire Department having jurisdiction. The Fire Department concerned then reviews the plans and issues the Larimer County Building Department a letter of project approval after they have reviewed and approved the plans. **Until the Fire Department having jurisdiction issues an “approval letter,” no building permit will be issued for the project concerned.**

Health & Environment Department Review and Approval: (Drinking & Dining establishments, Pet Shops.)

The applicant must take a full plan set to the Larimer County Health and Environment Department for review and approval. **The health department must sign off/approve plans in the computer system prior to issuance of a building permit.** Obtain a copy of the Larimer County Health and Environment Department’s Plan Review Requirements pamphlet for further direction.


State of Colorado Electrical Board:

Larimer County Building Division does not review electrical plans or issue electrical permits. A separate review and permit are required from the State of Colorado Electrical Board. State of Colorado Electrical inspectors perform all electrical inspections. (2017 National Electrical Code enforced as of July 1, 2017.)

For further information on requirements for your specific project, please call Larimer County Building Department at (970) 498-7660.

Updated January 29, 2019

MEMORANDUM

TO: Rob Helmick, Larimer County Planning Department
FROM: Steven Rothwell, Larimer County Engineering Department 
DATE: May 19th, 2020
SUBJECT: Northern Integrated Supply Line (NISP) 1041,
File #20-ZONE2657

Project Description/Background:

The Northern Integrated Supply Project Water Activity Enterprise (NISP WAE) has submitted a 1041 application for their Northern Integrated Supply Project (NISP), as authorized by the County's 1041 regulations (Sec. 14). The local elements of the proposed project include the reservoir's appurtenant elements and public recreation, water pipelines, and Highway 287 relocation.

Review Criteria:

The intent of this review is to evaluate the completeness of this submittal and its contents conformity to the requirements of the Larimer County Land Use Code (LCLUC). The materials submitted need to provide adequate information to accurately assess the drainage and transportation aspects for the site and how these aspects may impact the surrounding area. Larimer County Engineering Department development review staff members have reviewed the materials that were submitted to our office under these guidelines and per the criteria found in the Larimer County Land Use Code (LCLUC), Larimer County Urban Area Street Standards (LCUASS), Larimer County Rural Area Roadway Standards (LCRARS), Larimer County Stormwater Design Standards (LCSDS), and pertinent Intergovernmental Agreements.

Comments:

As was pointed out in the applicant's Project Description, Larimer County has provided technical review comments as part of the review of a previously submitted Intergovernmental Agreement (IGA) application. Since this is a new 1041 application and not a continuation of the IGA, staff intends to reiterate any previous comments or concerns, even if the applicant has already addressed them.



These comments are separated into three sections. The first section will address Larimer County Engineering Staff's questions and concerns regarding the 1041 criteria. Section II will comment on any questions or concerns with regards to the Technical Memorandums and their attachments. Lastly, Section III will present recommended Conditions of Approval.

Section I: 1041 Evaluation Criteria:

Staff is providing comments to items that are applicable to the Engineering Department. Other information included within this application will be reviewed and commented on by other County Staff or other referral agencies.

Criterion 2 – Alternatives

Larimer County Engineering does not have an opinion regarding the alternatives that were evaluated during the U.S. Army Corp of Engineer's (USACE) EIS review. Staff will defer to the USACE and any other pertinent agencies and organizations that participated in that review. The focus of this review will be with the evaluation of the provided Conveyance Alternatives.

The applicant has provided a Route Alternative Analysis, which evaluates several different conveyance alignment alternatives. Each alternative was evaluated against a set of performance criteria. It should be noted that from an engineering perspective, the alternatives presented are all viable options. Larimer County Engineering Staff is providing comments with respect to the analysis itself. Staff is not providing recommendations for the preferred alignment.

Prior to this submittal, Staff provided comments specifically addressing the Matrix Evaluation Criteria utilized in the Route Alternative Analysis. These comments have been included within Attachment A.

Many of the criteria assigned ratings based on subjective performance metrics. Little to no data were provided to support the preferred route selection or the non-preferred alternatives. This was especially evident for routes that were designated to contain a "fatal flaw." Larimer County Engineering concluded that without a higher level of specificity and more supporting data, the proposed alternatives could not be sufficiently evaluated.

In addition to the concerns with the performance criteria, Larimer County Engineering requested that the applicant evaluate all provided routes. Certain routing options were presented to have a "Fatal Flaw" and were only briefly discussed. These routes were not evaluated to the same extent as the other alternatives.

Attachment A: Memorandum regarding the Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551 (7/30/2019)



The applicant has since provided subsequent submittals of the Alternative Analysis that were then reviewed and commented on by Larimer County Staff. The second round of review comments are included in Attachment B.

The Alternative Analysis provided with this application appears to have addressed several of Staff's previous concerns. Specific engineering questions and concerns from the newly submitted Alternative Analysis can be found within the Technical Memorandum (TM) Review, later in this memorandum.

Criterion 3 – Conformance with Standards

Staff is providing comments to this proposal's conformance to the Standards of Development shown in Section 8 of the LCLUC that are applicable to the Engineering Department. The other relevant Standards for Development will be reviewed and commented on by other County Staff or other referral agencies.

8.1 – Adequate Public Facilities

As part of previous reviews, Larimer County Engineering requested that the applicant provide information that specifically addressed how adverse effects to public facilities would be mitigated during both the construction activities associated with this proposal and the operation of the proposed reservoir and recreation area. Staff requested the evaluation of potential impacts to Sewer, Water, Drainage, Fire, and Transportation Facilities.

Specific engineering questions and concerns with regards to the impacts to public facilities can be found within the Technical Memorandum (TM) Review, later in this memorandum.

8.3 – Hazard Areas

As part of previous reviews, the applicant had stated that the final design would address potential floodplain and geologic hazards. At that time, none had been specifically identified within the Route Alternative Analysis. The applicant was required to identify the specific conflict areas on the proposed route alternatives. As a participant in the National Flood Insurance Program (NFIP), Larimer County enforces floodplain regulations in accordance with the Federal Emergency Management Agency (FEMA) and the Colorado Water Conservation Board (CWCB).

As such, the proposed pipelines must comply with County floodplain regulations for all sections of the project that fall within a regulatory floodplain. Section 4.2.2.D.21 of LCLUC also requires that pipelines within a regulatory floodplain be processed as a floodplain special review and obtain approval from the Larimer County Flood Review Board and the Board of County Commissioners prior to construction. Devin Traff, Larimer County's Floodplain Administrator has provided a separate memorandum that

Attachment B: Memorandum regarding the Northern Integrated Supply Line (NISL) Intergovernmental Agreement (IGA), File #19-ZONE2551 – 2nd Submittal (11/08/2019)



includes more specific details on floodplain requirements. Please see Attachment C for more details. A Condition of Approval has been added to ensure the applicant will be required to adhere to the floodplain regulations and procedures present in said memo.

8.6 – Private Local Access Road and Parking Standards

Staff previously requested that more specific information be provided that discusses how the adjacent property owners will take access along the proposed U.S. Highway 287 realignment. It was noted that Larimer County will not accept ownership or maintenance responsibilities for the new proposed access road(s).

The applicant has since stated that the access road(s) will be designed and constructed at NISP WAE's cost and will thereafter be owned and maintained by the landowners through their existing Homeowner Association. Staff would like to note that these access roadways will still be required to be designed and constructed per the applicable Larimer County Standard.

Per Section 9 of the Project Description, "Access to these pipelines will be via the existing, public county road network on paved dirt roads or private pipeline easements. The pipeline corridor will be regraded and revegetated to match preconstruction condition without the need for additional site improvements." Recommended Conditions of Approval have been added to address the requirements associated with any access points or access easements that may be required as part of the proposed conveyance pipeline construction.

8.7 – Road Surfacing Requirements

During the initial review of the Conveyance Alternatives Analysis, Staff noted that any major impacts to the County's transportation system would need to be evaluated. The applicant has prepared an evaluation of the specific roadways that will be impacted by conveyance construction. This evaluation discusses the existing surface type for each of the roadways. Staff will require that the existing surface condition also be evaluated prior to construction. This shall not be limited to the construction areas themselves. These concerns will also need to be addressed along the designated haul routes that may experience accelerated deterioration.

A condition of approval has been added to address the mitigation measures that will be required for roads that will be directly or indirectly impacted as a result of this project.

Criterion 4 – Adverse Effects to Land

Staff previously stated that if this proposal were to be approved, the applicant would be required to develop a comprehensive document describing best management practices (BMPs) to be employed for utility planning and construction that potentially affects developed, rural, wetland and riparian land areas or may involve stream crossings. Such documentation was to include, but not be limited to, preconstruction and construction BMPs relating to surface water, erosion and sediment control and



prevention; groundwater considerations and protection; topsoil conservation and restoration and vegetation/revegetation considerations. Lastly, the document was to cover post-construction BMPs and monitoring requirements relating to these same topics.

The applicant has provided preliminary details on how erosion control and stormwater quality will be managed both during construction and post construction. Additional documentation will be required as part of the final design and construction permitting processes. Specific engineering questions and concerns with regards to the management of erosion control and stormwater quality can found within the Technical Memorandum (TM) Review, later in this memorandum.

Criterion 8/9 – Impacts to Public/County Facilities

The applicant has provided documentation that addresses potential impacts to public facilities. Engineering has provided comments on the impacts to public access, roadway and drainage facilities, both during previous reviews and as part of the Technical Memorandum (TM) Review, later in this memorandum.

Conveyance Construction

The information included with previous submittals did not provide enough details or data to determine the specific conveyance routing locations. The pipeline alignment sections that were shown to be within the right-of-way were considered conceptual in nature. They demonstrated the general location of the pipeline alignment, however, the illustrations and figures provided made it difficult to identify the potential impacts that each alternative would have on the immediately surrounding area.

More information was required to be provided in future submittals that specifically identified the County roadways and rights-of-way that would be impacted. This was to include the specific locations and extent of impacts to the County roadways and rights-of-way. Staff also requested that the applicant provide GIS Shape Files or an acceptable alternative for the alignment alternatives.

The applicant has now provided an evaluation of the roadways that are expected to be impacted due to the conveyance routing.

Poudre Valley Canal Improvements

The applicant has stated that in order to convey NISP diversions from the Poudre River to the Glade Reservoir Forebay, the existing diversion structure will need to be removed and replaced. The capacity of the diversion structure and approximately 10,800 feet (2.0 miles) of the existing Poudre Valley Canal would be expanded by 1,200 CFS to accommodate NISP diversions. The Poudre Valley Canal currently runs under County Road 29C.

The applicant has provided a supplement memo to TM No. 9 to better address the Poudre Valley Canal improvements. The supplement summarizes both the work that will be completed to the Poudre Valley Canal and the potential traffic, roadway, and access impacts that may results from the construction of the improvements. Specific



engineering questions and concerns with regards to information provided with Supplement 1 to TM No. 9 can be found within the Technical Memorandum (TM) Review, later in this memorandum.

US-287 Realignment

Previously, the applicant was requested to provide information to address the new facilities that will be constructed as part of the U.S. Highway 287 relocation. While the US-287 relocation component is being triggered by this proposal, the review of its alignment and any potential land use concerns associated with its relocation will be required to go through a separate process.

Engineering has identified specific impacts to County Facilities that will need to be mitigated both during and after the construction of the proposed realignment. Specific information addressing these impacts and mitigation measures will need to be provided either as part of this review or as part of the Colorado Department of Transportation's (CDOT) planning and design processes.

Section II: Technical Memorandums

Staff is providing comments to items that are applicable to the Engineering Department. Other information included within this application will be reviewed and commented on by other County Staff or other referral agencies.

TM-No. 3: (Conveyance Routing Alternative Analysis)

Evaluation Criteria

NISP's Conveyance Routing Alternative Analysis reviewed several different alternative alignments for each of the proposed pipelines.

Staff previously commented that the relative performance system used to evaluate the criteria in the Route Alternative Analysis was mostly subjective. The applicant was expected to revise the criteria in order to evaluate the alternatives using a more objective system. This included the requirement of developing a rating system for each category with specific scales or thresholds. Previous submittals only assigned color ratings. Staff was unable to truly gauge the significance of the difference between the color ratings without additional data.

See Attachment A for Staff's specific concerns with the previous provided route evaluation criteria and performance system.

Routing within Larimer County Rights-of-Way (ROW)

As part of previous reviews, for those reaches of the alignment that are parallel to a County Road, the applicant was required to locate the pipeline within the ROW unless an easement for the pipeline can be obtained from a willing seller outside of the ROW.

Attachment A: Memorandum regarding the Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551 (7/30/2019)



This limitation was not to apply to appurtenances when there were unreasonable physical challenges to pipeline construction in the ROW as determined by the Larimer County Engineer.

The applicant has since stated that it is the policy of Northern Water to place pipelines in easements, not public ROW. It has been their experience that the majority of existing ROWs do not typically have enough room for full construction, resulting in landowner's easement being required anyways.

From an engineering perspective, Staff would prefer for conveyance lines of this size to be located outside of the public ROW. The placement of utilities of this size within the ROW can make it difficult for the installation and maintenance of other utilities and roadway improvements. Additionally, the maintenance of these conveyance lines can cause impacts to traffic if the pipeline needs to be accessed or serviced in the future.

With this being said, the pipeline alignment along County Line Road shall be established based on the input and recommendations from the Towns of Timnath, Windsor, and Johnstown as well as Larimer and Weld Counties, with respect to the pipeline being located within or outside of the public road right-of-way.

Please note that at any locations where the applicant locates the pipeline outside of the existing County ROW, it shall do so in a manner to either:

- a) be located outside of the ultimate ROW width corresponding to the functional classification of the roadway or
- b) obtain and convert to a Larimer County road ROW easement for any additional pipeline easement widths falling within the ultimate roadway ROW.

Eagle Lake Area

One area of concern to Engineering is the routing through the Eagle Lake subdivision. Staff has previously commented that the applicant would be required to both develop a plan for construction and to obtain approval/easements from the Eagle Lake Homeowners and its association in order to pursue the planned route. An explanation of construction duration and access has been provided with the Construction approach for Pipeline Segment between Travis Road and Highway 1 which is included with the Northern Tier Delivery Pipeline Alternative Analysis.

This plan should include a discussion on how Eagle Lake Drive will be resurfaced following construction. Eagle Lake Drive is a private road that is owned and maintained by the Eagle Lake Homeowners Association.

The applicant should be aware that several roadways within Larimer County, while within public ROW, are maintained by either a Road Maintenance Association or Homeowner's Association. In instances where crossings are being proposed across Non-County maintained public roadways; the applicant will still be required to obtain a ROW Construction permit from the Larimer County Engineering Department. In these



instances, the applicant should also coordinate with the association directly when scheduling construction.

Applicant's Preferred Alignment

As was stated earlier in the memorandum, Staff is providing comments with regards to the Alternative Analysis itself. Staff is not proving a recommendation on a preferred alignment. Based on the provided analysis, it is Staff's opinion that none of the provided routes appear to contain a fatal flaw from an engineering perspective.

Staff will require that the applicant provide a construction and access plan for all segments of the preferred alignments. This should include similar details to those included with the Eagle Lake Construction Plan.

TM-No. 9 (Traffic Impacts)

The applicant has submitted a Traffic Impact Study (TIS) that addresses the anticipated traffic impacts that will result from the construction and operation of both the Glade Reservoir and Recreation Area components. Staff will refer to this as the Glade TIS. Additionally, a Traffic Memorandum has been submitted that addresses the impacts to traffic that may result from the construction of the preferred conveyance alignments. This will be referred to as the Conveyance TIS.

Please note that while both documents are labeled as Traffic Impact Studies, the TIS requirements shown in the Larimer County Rural Area Road Standards have not be followed. If this proposal is approved and allowed to proceed, a Full TIS will be required to detail the impacts to traffic that will result from the proposed reservoir and recreation area. Further studies may also be required on future submittals to evaluate specific impacts associated with pipeline construction.

Staff is reviewing the provided Traffic Impact Studies for the following information.

- 1) Temporary impacts due to the construction of the reservoir and recreation area
- 2) Impacts due to the operation of the reservoir and recreation area
- 3) Impacts as a result of the US287 relocation
- 4) Temporary impacts due to the construction of the conveyance pipelines

Glade TIS & Chapter 4.12 (EIS)

As part of this review, Staff is taking the information provided in Chapter 4.13 of the NISP EIS into consideration. Section 4.13 of the NISP EIS describes the effects of the NISP alternatives on traffic and transportation. The Glade TIS summarizes the information provided within the EIS. It does not appear that any new information is being provided as part of this application.

Construction

When evaluating the anticipated impacts from construction, the Glade TIS states that there will be an estimated peak of 1,572 trips during the summer and 393 trips during the winter. It was noted that the volume of predicted daily construction traffic would have



a major impact on State Highway 14, increasing daily volumes by an average of 50% and 100% on a peak summer day.

The SH14 traffic counts shown in the FEIS appear low. CDOT's most recent counts show and Average Daily Traffic (ADT) of 3000 along that segment of SH14. When comparing against CDOT's counts, the proposed construction traffic would increase daily volumes by an average of 25% and 50% on a peak summer day. While these impacts are less than what is shown in the FEIS, they will still have a temporary impact on public roadways. To ensure that the impacts from construction are mitigated, conditions of approval have been added to address Staff's concerns.

The Glade TIS states that "A portion of the construction related traffic will be related to hauling aggregate material to the site. The exact quantities of imported material are not currently known as it will be dependent on the results of additional geotechnical investigations." Despite the applicant's intentions to obtain the majority of the required material on site, the applicant will still need to provide more details on the anticipated haul routes for aggregate suppliers. Depending on the results of the geotechnical investigation, a significant amount of material may be required to be hauled to the site. An estimation of the impacts caused from hauling will need be included with this study.

The Glade TIS does not adequately address potential impacts to County Roads. It states that, "In addition to the increased traffic volumes caused by construction activities, there will also be temporary impacts to local roadways caused by construction activities. These impacts will be mitigated as described in the FEIS by developing traffic control plans and final roadway designs that minimize impacts on traffic and meet requirements of the agency responsible for the impacted roadway."

It is unclear what the specific access routes to the construction site will be and whether there are any impacts to County roads and/or functional improvements needed to accommodate such traffic. The same concerns would apply to the construction of the recreational facilities. Staff is unclear whether the TIS includes traffic impacts from the construction of the recreation facilities as part of the estimated trips. It appears that these are only associated with the reservoir construction, not with the recreation component.

As was stated previously, Staff has concerns with the proposed Poudre Valley Canal construction. Not only does this directly effect a Larimer County maintained roadway and structure, it also appears to impact a vital access point to SH14 for several properties and an electric substation. The applicant has provided a supplement memo to TM No. 9 to better address the Poudre Valley Canal improvements. The supplement summarizes both the work that will be completed to the Poudre Valley Canal and the potential traffic, roadway, and access impacts that may results from the construction of the improvements. The applicant still needs to detail the anticipated improvements and how they intend on maintaining access across the Canal during construction.



Operation

The Glade TIS states that “A more detailed evaluation of recreation traffic can be completed in association with the future Recreation Development Plan when traffic generation and associated impacts can be more accurately assessed.” Staff agrees that it will be difficult to provide specific estimations of traffic impacts that will result from the operation of the reservoir and recreation area at this time

This being said, the applicant shall be required to go through the County’s Site Plan process for any facilities associated with the Glade recreation component. As was stated previously, a Full TIS will be required at that time to detail the impacts to traffic that will result from the proposed reservoir and recreation area.

The Glade TIS does provide a brief estimation of both trip generation and trip distribution that will result from the reservoir and recreation areas during operation. It is assumed that approximately 1,150 vehicles will visit the site each day during the summer months. It is also assumed that these vehicles will be distributed equally between SH14 & US287. Staff would like further explanation on how this trip distribution is being determined.

Staff has previously raised concern with the intersection of CR 21C & US 287. This intersection has been the site of previous serious and fatal crashes. CDOT has constructed some limited safety improvements at this intersection to improve the skew angle of CR 21C. Section 4.13 of the EIS makes reference to an additional 25 peak hour northbound lefts at this intersection that will result from the new reservoir and recreation area.

In order to address this concern, the applicant has stated that the NISP WAE will coordinate with CDOT to complete a safety study of the CR 21C and US287 intersection to analyze the need for safety upgrades at that intersection and evaluate potential solutions if warranted. Larimer County would like assurances that if a safety study concludes that intersection upgrades are warranted, that they are implemented not just evaluated.

Conveyance TIS

The Conveyance TIS provides a high-level analysis of the anticipated traffic impacts during construction of the pipelines. As part this analysis, each of the preferred alignments have been broken down into several Traffic Study Areas. These study areas include areas where the conveyance alignment runs parallel to roadways within 100-feet, crosses roadways with trenchless crossings, or crosses gravel roads.

Analysis

Staff agrees with the information presented in the analysis with a few exceptions that are noted below.



Many of the anticipated public and private gravel road crossings are not included on the ROW impact tables. The applicant will need to include more detail for all gravel road crossings.

- Area N-6: The preferred Northern Tier alignment is being shown to parallel US-287 along this stretch. It should be noted that the pipeline will also be paralleling CR56 throughout this section.
- CR56 is also proposed to be crossed twice at each of its access point to US287. These crossings are not identified.
- Niobrara Ridge Rd is shown to be crossed prior to the CR21C crossing. Niobrara Ridge is a privately owned and maintained roadway. The applicant will be required to obtain approval from the roadway's owner(s). The crossing will also need to be completed and restored per the LCRARS.
- Prior to the HW 1 crossing shown on Area N-12, the applicant is proposing to cross Eagle Lake Drive. Eagle Lake Drive is a privately owned and maintained roadway. The applicant will be required to obtain approval from the Eagle Lake HOA. The crossing will also need to be completed and restored per the LCRARS.
- Prior to the HW 1 crossing shown on Area N-12, the applicant is proposing to cross Hood Lane. Hood Lane is a privately owned and maintained roadway. The applicant will be required to obtain approval from the roadway's owner(s). The crossing will also need to be completed and restored per the LCRARS.
- Prior to and after the CR 13 Crossing, it appears that there is parallel alignment section along Grey Rock Road that is not identified. Grey Rock Road is a public road west of CR13 and a private road east of CR13. The applicant will be required to coordinate with both the Larimer County Engineering Department and the roadways owner(s) for any traffic/roadway impacts.
- The preferred Northern Tier alignment is shown to cross Douglas Road after crossing CR9/Giddings. This crossing has not been identified.
- Within the Traffic Studies Areas N-26, N-27, and N-28, there appears to be a section of pipeline being aligned within the CR52 ROW. These areas are identified as parallel impact types. The applicant will need to confirm whether the pipeline is being proposed within the CR52 ultimate ROW through this section.
- Prior to crossing CR3, the preferred alignment is shown to be crossing Barry Lane. This crossing has not been identified.
- Staging Areas and proposed access points to the conveyance construction operation will need to be identified as well.



Conclusions

Based on the analysis provided with the Conveyance TIS, minimal impacts are anticipated to the County Road System as a result of the construction of the preferred conveyance alignments. The applicant is proposing for the majority of its conveyance pipelines to be aligned outside of the public ROW. This minimizes the impacts to both the roadways and the traveling public.

Additionally, no full closures have been proposed to roadways. Either trenchless crossings or single lane closures with flaggers are being proposed. Previous submittals proposed trenchless crossing at railways, highways, and Paved Arterial or Collector Roadways. The applicant has now proposed trenchless crossings at all paved roadways and is only requesting open trench construction methods when crossing a gravel surfaced roadway.

Along with those listed in the Conveyance TIS, several conditions of approval have been added to ensure that the impacts to Larimer County roadways and the traveling public are properly mitigated during and after construction.

It may be necessary to have additional traffic control, including flaggers, in areas where the pipeline construction parallels roadways to manage construction and roadway traffic interactions. Additionally, the applicant and/or its contractor will be required to coordinate with Larimer County if vehicles are planned to be detoured onto County roadways as part of a closure of a roadway owned or operated by another municipality or government agency.

It is stated that Northern Water be required to represent anticipated haul/delivery routes and coordinate the same with Larimer County. A condition of approval has been added to address the potential for accelerated surface deterioration along planned haul routes.

As was stated previously, in addition to the information presented with the Conveyance TIS, the applicant will be required to provide a detailed plan describing the construction plan for each Traffic Study Area. This plan should discuss the anticipated scale and duration of impacts, construction methods being proposed, and planned points of access for equipment and deliveries. Each plan should provide similar information to that which was provided with the Eagle Lake Construction Plan.

US287

The applicant has stated in the Project Description that "Larimer County in its designation of areas and activities of state interest and associated 1041 permitting process declined to regulate state highways. As a result, the relocation of US287 is not included in the permit application and associated application materials."

Larimer County Engineering has expressed concerns with the proximity of several intersections near the new US 287 tie-in. These intersections will need to be evaluated for function, safety, and spacing. Engineering has identified specific impacts to County Facilities that will need to be mitigated both during and after the construction of the



proposed realignment. Specific information addressing these impacts and mitigation measures will need to be provided either as part of this review or as part of CDOT's planning and design processes.

NISP WAE is currently developing the preliminary and final design of the roadway alignment in coordination with CDOT. Larimer County Engineering will need to be allowed to participate in the planning and design of the US-287 realignment as well. A condition of approval has been added to ensure that the impacts to Larimer County roadways will be addressed with the realignment.

TM-No.10: Drainage Plan

The applicant has submitted a Drainage Plan for the Glade Reservoir component and a Drainage Narrative for the Conveyance component.

Glade Drainage & Stormwater Quality:

The provided Drainage Plan summarizes the hydraulic and hydrologic analyses for the project. The analysis and design of the reservoir and its conveyance/hydraulic structures are reviewed by the Colorado Department of Water Resources (CDWR). Staff is not providing an in-depth review of the provided hydraulic analysis as part of this memorandum.

The applicant has stated that the drainage basin associated with recreation area have not been analyzed since the layout and design have yet to be completed. The drainage and water quality impacts associated with the recreation component will need to be evaluated as part of the Site Plan review process.

Appendix A and B are both referenced in Technical Memorandum No. 10. Appendix A is stated to include the full analysis of the upstream drainage area and Appendix B is said to include the downstream. Staff is unable to locate where Appendix A and B have been provided with this application.

The applicant has provided an overview of the anticipated temporary and permanent BMPs that will be utilized during and after construction. The applicant has also stated that a SWMP will be prepared and that a State Stormwater Permit will be obtained prior to construction. Staff will require a copy of the SWMP and permit prior to construction. Any disturbances being proposed within the Larimer County MS4 boundary will be required to adhere to Larimer County's MS4 regulations. Conditions of approval have been added to ensure that erosion control and stormwater water quality are being addressed both during and after construction for the reservoir and recreation area construction.



Conveyance Drainage and Water Quality

TM No. 10 also includes a Drainage Narrative that discusses the stormwater control measures associated with the conveyance system construction. The narrative provides an overview of streams and wetlands that may be impacted due to the construction of the conveyance facilities.

Any impacts to wetlands and or waterways will be regulated by the USACE and EPA as part of their Section 404 permitting process. As was stated in the narrative, the applicant will also be required to obtain a CDPHE stormwater permit for all disturbed areas in association with the project. A SWMP will be required for the conveyance construction as well. As was discussed above, Staff will require a copy of the SWMP and permit prior to construction.

Any disturbances being proposed within the Larimer County MS4 boundary will be required to adhere to Larimer County's MS4 regulations. It is stated within the narrative that, "Permanent erosion control measures will not be required since disturbed areas will be returned to mimic ore-existing vegetation patterns." In areas within the Larimer County MS4 boundary, documentation will need to be submitted that discusses which permit exclusions are being met to not require permanent erosion control measures.

The applicant has provided "Commitments to match pre-existing vegetation through proper grading and revegetation." In addition to these commitments, Conditions of Approval have been added to ensure that erosion control and stormwater water quality are being addressed both during and after construction of the conveyance pipelines.

TM-No. 11: Floodplain Report

The applicant has provided an overview of the proposal's impacts to floodplains. As was stated previously, the proposed reservoir, recreation area, and pipelines must comply with County floodplain regulations for all sections that fall within a regulatory floodplain. Section 4.2.2.D.21 of Larimer County Land Use Code also requires that pipelines within a regulatory floodplain be processed as a floodplain special review and obtain approval from the Larimer County Flood Review Board and the Board of County Commissioners prior to construction.

Devin Traff, Larimer County's Floodplain Administrator has provided a separate memorandum that includes more specific details on floodplain requirements. Please see Attachment C for more details.

TM-No. 12: Groundwater Modeling Report

The applicant has provided an overview of groundwater levels for the areas where conveyance pipelines are being proposed.



The groundwater depths provided have been gathered from the CDWR's well permit applications. The depths provided are only approximates. It is stated that a more detailed geotechnical exploration and site-specific groundwater issues will be addressed during the final design. Several possible measures for mitigating high groundwater during and after construction of the conveyance pipelines are also provided.

A condition of approval has been added to ensure that site specific geotechnical exploration and analysis are completed prior to construction. Additionally, the type and location of groundwater mitigation measures will need to be detailed with the final design. Staff will also require the applicant to monitor groundwater levels for a time period to-be-determined following construction for any areas that require mitigation measures.

Section III: Conditions of Approval:

General:

- 1) Alignment adjustments that would move closer to an existing structure, or that would move into an existing or future road right-of-way corridor (as determined by road functional classification) will be subject to Larimer County Review.
- 2) If a relocation of the pipeline should in the future be desirable to accommodate some other or enlarged use of the County road right-of-way by any party or entity other than the County, and provided that the applicant agrees to such relocation, then all expenses of such relocation shall be paid for entirely by the party or entity desiring such relocation. If the relocation is to be made at the request of the County to accommodate changes in or improvements of public roadways or associated infrastructure, and not for purposes of accommodating any third party, then the applicant shall provide for pipeline relocations at their own cost on a reasonable schedule established by the County Engineering Department. This condition is only applicable for instances where the pipeline is being proposed within the County's Ultimate ROW.
- 3) Site plan review shall be required for the recreation facilities and infrastructure associated with these facilities.

Transportation and Access:

- 4) Final design plans and specifications for alignments within the ROW will need to be prepared for review and approval by the Larimer County Engineering Department. Should it be discovered that the final design, in the County Engineer's opinion, deviates significantly from the conceptual alignment to change the nature of impacts of the pipeline within the permit limits, the County reserves the right to require that the design and alignment be modified to address infrastructure and property impacts as deemed necessary by the County Engineering Department.



- 5) Northern Water and/or the NISP WAE shall coordinate with Larimer County and CDOT to ensure that traffic, safety, and access concerns associated with the proposed US287 realignment are adequately evaluated and addressed.
- 6) Northern Water and/or the NISP WAE shall coordinate with CDOT and Larimer County on the preparation of a Traffic Safety Study for the US-287 and CR 21C intersection. If improvements are warranted, Northern Water and/or the NISP WAE shall ensure that they are implemented as part of the US287 realignment.
- 7) In locations where the conveyance pipelines are located outside of the existing County ROW, it shall do so in a manner to either:
 - be located outside of the ultimate ROW width corresponding to the functional classification of the roadway or
 - obtain and convert to a Larimer County road right-of-way easement for any additional pipeline easement widths falling within the ultimate roadway ROW.
- 8) Northern Water and/or the NISP WAE shall submit to Larimer County a Traffic Control and Management Plan for review by the County Engineer prior to construction addressing traffic control devices/personnel (warning signs, flaggers, traffic control supervisors, etc.), any specific delay times, adjacent neighboring property owner notifications, and use and placement of message boards. The Traffic Control and Management Plan will include requirements to provide safe and acceptable access for emergency responders, mail and package delivery, garbage pickup, and school bus stops. The Traffic Control and Management Plan will also identify all proposed access points.
- 9) Whenever it is necessary to cross, close, or obstruct roads, driveways, and walks, whether public or private, the applicant will provide and maintain suitable and safe detours or other temporary expedients for accommodation of public and private travel, emergency vehicles, delivery services, garbage pickup, school bus stops, etc.
- 10) The applicant will be required to provide information that discusses how the proposed pipeline sections located within County ROW will be accessed for maintenance and operation.

Drainage and Erosion Control:

- 11) Northern Water and/or the NISP WAE shall obtain a storm water discharge and construction dewatering permit from the Colorado Department of Public Health and Environment for construction at drainage crossings, per Section 8.12 of the Land Use Code. These permits will include the preparation of a Storm Water Management Plan and Best Management Practices to prevent storm water runoff and sediment in disturbed areas from reaching nearby waterways or otherwise leaving the site.



- 12) Northern Water and/or the NISP WAE shall adhere to Larimer County MS4 regulations for all applicable work within the most up to date Larimer County MS4 boundary.
- 13) Northern Water and/or the NISP WAE shall complete site specific geotechnical exploration and analysis prior to construction. Additionally, the type and location of groundwater mitigation measures will need to be detailed with the final design. Groundwater levels may need to be monitored for a time period to-be-determined following construction for any areas that required mitigation measures.

Utilities:

- 14) Northern Water and/or the NISP WAE shall be responsible for arranging and paying all costs of
 - utility relocations and irrigation company requirements necessary to accommodate the water pipeline in the road ROW.
 - the replacement of existing storm drainage infrastructure, culverts, roadway signage, pavement striping/symbols, landscaping and property fencing necessary to accommodate the water pipeline in the ROW.
 - damage or relocation of private property services as necessary to accommodate the water pipeline corridor if a reasonable alternative is not possible.
- 15) In the event that septic systems and/or well components are damaged during construction activities, the applicant will be responsible for immediate repair/replacement and all associated costs to prevent extended disruption of the property owner's normal access to and use of such facilities.

Floodplain:

- 16) The applicant will be required to comply with County floodplain regulations. The requirements shown in the attached NISP Floodplain Memorandum will need to be adhered to. Please contact Devin Traff (970-498-5731; dtraff@larimer.org) for additional information on this process.

Construction Permitting:

- 17) When construction activity is taking place within or impacting Larimer County ROW in anyway, Northern Water and/or the NISP WAE shall obtain and abide by the standards and conditions of applicable County ROW permit(s), per the Code of Ordinances and the Land Use Code. Construction plans will need to be provided detailing the work to be completed. Additionally, Traffic Control Plans, developed by a certified traffic control company, must be submitted for all work performed within road ROW or that will directly affect the travelling public.
- 18) A Development Construction Permit (DCP) is required prior to the commencement of any improvements associated with an approved project. The permit is required to construct both public and private infrastructure



improvements that are a result of the Land Use Application review and approval process. Northern Water and/or the NISP WAE shall obtain a DCP for work associated with the recreation component of this proposal. The DCP can be applied for following Site Plan approval.

- 19) Larimer County regulates access to county roads to maintain safe traffic flow, road drainage facilities, and efficient use of the County's roads. Access Permits will be required for any new access from Larimer County ROW regardless of whether they are to be used for temporary construction purposes or are to be permanent.
- 20) Heavy equipment traffic will be subject to all weight limit restrictions along adjacent roadways and will obtain oversize/overweight permits.
- 21) The applicant shall be required to obtain any additional State, Federal, or Local permits necessary for construction. When applicable, the applicant or its contractors will be required to obtain other Larimer County issued permits as well. These could include, but are not limited to, Building Permits, Floodplain Development Permits, and/or Utility Permits.

Construction.

- 22) Northern Water and/or the NISP WAE shall allow access to Larimer County staff and consultants for inspections and construction observation throughout the Project and for the term of the construction.
- 23) Northern Water and/or the NISP WAE shall reimburse Larimer County for reasonable costs associated with County-provided construction observation/ inspection staff and/or independent, supplemental geotechnical or materials testing deemed appropriate by the County Engineer for purposes of quality assurance/ control. The applicant shall also reimburse Larimer County for time and expenses incurred with Project coordination, design review, permit review and processing and related Project activities during the duration of Project construction and closeout for the work conducted in unincorporated Larimer County.
- 24) Northern Water and/or the NISP WAE shall invite Larimer County staff to attend regularly scheduled coordination meetings during construction - at a frequency to-be-determined - to understand planned construction activities and stay abreast of issues arising from construction impacts to County infrastructure or the public.
- 25) A geotechnical subsurface investigation shall be submitted to Larimer County during the design process for those portions of the alignment to be within County ROW, to determine required trench backfill and compaction specifications, subgrade mitigation, and pavement design for areas disturbed by the pipeline installation.
- 26) The applicant shall provide to Larimer County a pre-project video capturing existing conditions of the proposed water line installation corridor in and near the existing ROW.



- 27) Unless otherwise approved by Larimer County Engineering, all proposed roadway crossings shall be completed by the specific construction method shown in the TIS included with Technical Memorandum No. 9. Any proposed open cut road crossing shall be flow filled to a depth of 2-feet below the surface of the roadway. Design approval of these crossings shall be per the Code of Ordinances and the Land Use Code.
- 28) During construction, the applicant shall stabilize and repave all pavement areas disturbed or damaged during pipeline installation in accordance with the Larimer County Urban Area Street Standards for work areas within the Growth Management Area (GMA) or Larimer County Rural Area Road Standards for work areas outside the GMA as directed by the County. It is also expected that if pipeline construction activities involve more than 100 linear feet of disturbance, the applicant shall be responsible for pavement repairs and patching/overlay extending to the full limits (width) of the existing pavement.
- 29) The applicant shall be required to designate planned haul routes. The existing surface condition of all planned haul routes will need to be evaluated prior to construction. If it is determined by the County Engineer that there has been an acceleration in deterioration of the roadway surface during or after construction as a result of construction traffic, equipment, or hauling, the applicant will be required to restore the roadways to their prior condition. This may include the need for regrading and or resurfacing.
- 30) The applicant shall submit phasing plans, including planned workdays and hours, to be reviewed by Larimer County Engineering Department. Maximum open trench lengths will be defined in consultation with the Larimer County Engineering Department.
- 31) The applicant shall develop and provide Larimer County with accurate as-built horizontal and vertical survey data (state plane coordinates and elevations in NAVD 88) and GIS shapefiles describing the location of the pipeline and all appurtenant structures.
- 32) The applicant shall provide Larimer County with as-built construction drawings certified by a Colorado registered professional engineer, for all portions of the pipeline located in unincorporated Larimer County.
- 33) The applicant shall establish and maintain a website with daily updates on the project describing the status of the project and the traffic impacts for that day, and the upcoming week.
- 34) The applicant shall provide a public information contact with a phone number and email address that the public can contact to ask questions, express concerns or for project updates.
- 35) Material test reports, as per Larimer County Standard, must be submitted to and approved by Larimer County for any work to take place within County ROW.



- 36) The applicant shall comply with maximum decibels for construction activities as outlined in the Larimer County Noise Ordinance. Any exceptions to these parameters must be approved by Larimer County.
- 37) The applicant shall submit a noise mitigation plan with the final design plans outlining control methods that will be implemented during construction amongst residences.
- 38) A pre-construction inventory of County roads to be used for construction traffic will be created and updated as needed by Northern Water during construction, documenting pre-construction conditions and the work conducted by Northern Water to return the roads to pre-construction conditions when construction is complete.

Staff Recommendation:

The Larimer County Engineering Department cannot recommend approval of this proposal until the above comments have been addressed and our department has reviewed and approved the additional information. In addition, the applicant shall provide written responses to the above comments on the next submittal. The applicant should be aware that our department has based the comments on the submitted information and once the additional information has been submitted, we may have additional comments.

Please feel free to contact me at (970) 498-5715 or e-mail me at srothwell@larimer.org if you have any questions. Thank you.

Attachments.


Attachment A: Memorandum regarding the Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551 (7/30/2019)

Attachment B: Memorandum regarding the Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551 – 2nd Submittal (11/08/2019)

Attachment C: Memorandum regarding NISP Floodplain Review Comments (4-27-2020)

cc: helmicrp@co.larimer.co.us
cbrouwer@northernwater.org
 file

MEMORANDUM

TO: Rob Helmick, Larimer County Planning Department
FROM: Steven Rothwell, Larimer County Engineering Department 
DATE: July 30, 2019
SUBJECT: Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551

Project Description/Background:

Northern Water has requested an Intergovernmental Agreement for the Northern Integrated Supply Project, as authorized by the County's 1041 regulations (Sec. 14). The local elements of the proposed project include the reservoir's appurtenant elements and public recreation, water pipelines, and Highway 287 relocation.

Review Criteria:

The intent of this review is to evaluate the completeness of this submittal and its contents conformity to the requirements of the Larimer County Land Use Code (LCLUC). The materials submitted need to provide adequate information to accurately assess the drainage and transportation aspects for the site and how these aspects may impact the surrounding area. Larimer County Engineering Department development review staff members have reviewed the materials that were submitted to our office under these guidelines and per the criteria found in the Larimer County Land Use Code (LCLUC), Larimer County Urban Area Street Standards (LCUASS), Larimer County Rural Area Roadway Standards (LCRARS), Larimer County Stormwater Design Standards (LCSDS), and pertinent Intergovernmental Agreements.

Comments:

1041 Evaluation Criteria:

We are providing comments to items that are applicable to the Engineering Department. Other information included with this proposal will be reviewed and commented on by other County Staff or other referral agencies.



Criterion 2 – Alternatives

This proposal contains the applicant's preferred route and other non-preferred alternative routes for the different pipeline sections. These routes have been evaluated against a provided set of criteria. Comments specifically addressing the Matrix Evaluation Criteria utilized in the Route Alternative Analysis are included later in this memorandum.

It appears that the applicant has self-selected their preferred route and then summarily concluded that the other alternatives were not feasible. Many of the evaluation criteria assign ratings based on subjective performance metrics. Little to no empirical data has been provided to support the preferred route selection or the non-preferred alternatives. This is especially evident for routes that have been designated to contain a "fatal flaw." Without a higher level of specificity and more supporting data, the proposed alternatives cannot be sufficiently evaluated by the Larimer County Engineering Department.

Additionally, all provided routes need to be evaluated based on the evaluation criteria shown on Table 1 of the Route Alternative Analysis. This includes the routes designated to contain a "fatal flaw."

Criterion 3 – Conformance with Standards

We are providing comments to this proposal's conformance to the Standards of Development shown in Section 8 of the LCLUC that are applicable to the Engineering Department. The other relevant Standards for Development will be reviewed and commented on by other County Staff or other referral agencies.

8.1 – Adequate Public Facilities

Future submittals will be required to provide information that specifically address how adverse effects to public facilities will be mitigated during construction activities associated with this proposal. Potential impacts will need to be evaluated and mitigation measures will need to be proposed for Sewer Facilities, Water Facilities, Drainage Facilities, Fire Facilities, and Transportation Facilities. More specific details are provided under the review of the applicable Matrix Evaluation Criteria.

In addition to the potential impacts to existing public facilities that will result from the proposed construction activities, the applicant shall provide information during the design phase that address the new facilities that will be constructed as part of the proposed Glade Reservoir Recreational Area and U.S. Highway 287 relocation.

8.3 – Hazard Areas

This proposal states that the final design will address potential floodplain and geologic hazards but none have been specifically identified in the Route Alternative Analysis. The applicant will be required to identify the specific conflict areas on the proposed route alternatives. Please note that as a participant in the National Flood Insurance Program (NFIP), Larimer County enforces floodplain regulations in accordance with the Federal Emergency Management Agency (FEMA) and the Colorado Water Conservation Board (CWCB).



The Northern Integrated Supply Project (NISP) has proposed several alternate pipeline routes which encroach into regulatory floodplains. As such, the proposed pipeline must comply with County floodplain regulations for all sections of pipe that fall within a regulatory floodplain. Section 4.2.2.D.21 of Larimer County Land Use Code also requires that pipelines within a regulatory floodplain be processed as a floodplain special review and obtain approval from the Larimer County Flood Review Board and the Board of County Commissioners prior to construction. This process can take several months and requires completed design plans, hydraulic analyses, and the submittal of federal and state permits required for construction. Please contact Devin Traff (970-498-5731; dtraff@larimer.org) for additional information on this process.

8.6 – Private Local Access Road and Parking Standards

More specific information will need to be provided with future submittals that discusses how the adjacent property owners will take access along the new U.S. Highway 287. It should be noted that Larimer County will not accept ownership or maintenance responsibilities for the new proposed access road(s). These will need to be owned and maintained by CDOT.

8.7 – Road Surfacing Requirements

Any major impacts to the county transportation system will need to be discussed. This discussion should include an evaluation of both the existing surfacing type and condition of the roads that will be directly or indirectly impacted as a result of this project.

Criterion 4 – Adverse Effects to Land

If this proposal were to be approved, the applicant shall develop a comprehensive document describing best management practices (BMPs) to be employed for utility planning and construction that potentially affects developed, rural, wetland and riparian land areas or may involve stream crossings. Such documentation shall include, but not be limited to, preconstruction and construction BMPs relating to surface water, erosion and sediment control and prevention; groundwater considerations and protection; topsoil conservation and restoration and vegetation/revegetation considerations. The document shall also cover post-construction BMPs and monitoring requirements relating to these same topics.

Criterion 8 – Public Facilities

As previously stated, the applicant will need to provide additional information with future submittals that evaluate the impacts that construction activities will have on existing public facilities and discuss the new facilities that will be constructed as part of the proposed Glade Reservoir Recreational Area and U.S. Highway 287 relocation. More specific details are provided under the review of the applicable Matrix Evaluation Criteria.



Criterion 9 – County Facilities

The pipeline alignment sections that are shown to be within the right-of-way (ROW) are considered conceptual in nature and demonstrates the general location of the pipeline alignment. More information will need to be provided in future submittals that specifically identify the County roadways and rights-of-way that will be impacted. This will need to include the specific locations and extent of impacts to the County roadways and rights-of-way. More specific details are provided under the review of the applicable Matrix Evaluation Criteria.

Alternative Analysis:

As previously stated, the proposed alternatives cannot be sufficiently evaluated by the Larimer County Engineering Department without a higher level of specificity and more supporting data. Future proposals will need to include an objective evaluation of all of the alternatives against the provided criteria.

Matrix Evaluation Criteria

The relative performance system used to evaluate the criteria in the technical memorandum provided by Northern is mostly subjective. We expect the criteria to be evaluated using a more objective system. Empirical data should be provided to support all of the individual ratings assigned to the alternatives.

Several of the evaluation criteria do currently assign a performance rating based on empirical evidence. For example, many base their ratings on an estimated number of occurrences; however, the thresholds separating these ratings are identified as the most occurrences, the least occurrences, and everything in between. Without specific scales or thresholds, we are unable to truly gauge the significance of the difference between the color ratings.

An example of when this becomes a problem is when the Northern Alignment is being evaluated for Surface and Street Impacts. Under that evaluation, Alternative 1.1 is assigned a yellow rating with an estimated seven crossings, Alternative 1.2 is assigned a red rating with an estimated nine crossings, Alternative 1.3 is assigned a yellow rating with an estimated five crossings, and the other alternatives were not reviewed due to a “fatal flaw.” It isn’t possible to establish a rating system without the full range of occurrences for all of the proposed alternatives.

This is also the case for Conduit Length, Easement Difficulty, Existing Utilities, Water Storage Reservoirs Impacts, Construction Duration and Relative Constructability, Required Trenchless Crossings, Development Pressure, and Natural Resource Impacts.

Capital Costs

While the overall cost is an important factor for the owner when evaluating the feasibility of a project, Engineering is not factoring it in as part of our evaluation of the proposed alternatives.



Conduit Length

The Total Pipeline Length Evaluation Criteria assigns lower performance ratings for routes that have a lengthier pipeline. This rating system is based on the notion that an increase in pipeline length will result in negative hydraulic impacts and additional future maintenance. While these impacts are important, they primarily affect the applicant. Due to this, Engineering is not factoring it in as part of our evaluation of the proposed alternatives.

It should be noted that it is not our intention to disregard the evaluation criterion that negatively impact the applicant, but, if these criterion are to be included, they will need to be weighed against the potential benefits to the public and the County. As currently proposed, it appears that negative impacts to the applicant are being used as the principal consideration in selecting the preferred route. For instance, the Total Pipeline Length is the criteria predominantly referenced when an alternative alignment has been designated to contain a “fatal flaw.” Engineering finds it difficult to justify the removal of an alternative route due to a poor rating in a category that primarily impacts the applicant.

Right-of-Way Impact / Easement Difficulty

The applicant shall be required to, for those reaches of the alignment that are parallel to a County Road, to locate the pipeline within the ROW unless an easement for the pipeline can be obtained from a willing seller outside of the ROW. This limitation does not apply to appurtenances and when there are unreasonable physical challenges to pipeline construction in the ROW as determined by the Larimer County Engineer.

The pipeline alignment along County Line Road shall be established based on input and recommendations from the Towns of Timnath, Windsor, and Johnstown as well as Larimer and Weld Counties, with respect to the pipeline being located within or outside of the public road right-of-way.

Please note that at any locations where the applicant locates the pipeline outside of the existing County road ROW, it shall do so in a manner to either:

- a) be located outside of the ultimate ROW width corresponding to the functional classification of the roadway or
- b) obtain and convert to a Larimer County road right-of-way easement for any additional pipeline easement widths falling within the ultimate roadway ROW.

Future submittals will be required to include a more accurate evaluation of where the proposed alternatives both cross and are located within the ROW.

Land Owner Impact

The applicant will be required to identify and detail the access impacts used to assign each alternative’s performance rating. Ultimately, Engineering would prefer that access impacts be given its own criteria. It is not clear how much of the Land Owner Impact criteria is being influenced by access issues or land interference.



The red performance metric for Land Owner Impacts states that some accesses will be temporarily blocked. Blocked accesses will not be permitted, the applicant shall always maintain access to all adjacent properties.

The applicant shall submit a plan to the County Engineering Department for review and approval establishing construction requirements to provide safe and acceptable access for emergency responders, mail and package delivery, garbage pickup, and school bus stops for the duration of the project.

Existing Utilities

The Existing Utilities Evaluation Criteria rates the alternatives based on the number of anticipated utility relocations and the level of coordination required with adjacent and crossing utilities. This criteria also states that the rating is directly based on the number of streets being crossed. More specific details need to be provided on the street crossings being referenced. The applicant should also identify any other major utilities outside of the County ROW that may conflict with the proposed routes. These details will need to be provided for all of the proposed alternatives.

Please note that if this proposal were to be approved, the applicant shall be responsible for arranging and paying all costs of

- utility relocations and irrigation company requirements necessary to accommodate the water pipeline in the road right-of-way.
- the replacement of existing storm drainage infrastructure, culverts, roadway signage, pavement striping/symbols, landscaping and property fencing necessary to accommodate the water pipeline in the road right-of-way
- damage or relocation of private property services as necessary to accommodate the water pipeline corridor if a reasonable alternative is not possible.

In the event septic system and/or well components are damaged during construction activities, the applicant will be responsible for immediate repair/replacement and all associated costs to prevent extended disruption of the property owner's quality of life.

Prior to the issuance of any construction permits, the County reserves the right to reevaluate the planned alignment with relation to other major transmission lines in the County.

Hazardous/Permitted Crossings

As stated previously, the applicant will be required to identify the specific crossing that have been deemed hazardous or require permitting for all of the proposed route alternatives. Please note that if this project were to be approved, the applicant shall obtain all required and necessary crossing permit, licenses and permissions for all ditch, roadway and other infrastructure crossings prior to commencing any construction. Additionally, a County right-of-way work permit will be required to be obtained for each perpendicular crossing or contiguous segment of pipeline to be located within County ROW.



Surface and Street Impacts

The applicant will be required to identify and detail the specific Street Crossings used to assign each alternative's performance rating. The roadway surface type should also be identified at each of the proposed crossings.

Traffic Impacts

The evaluation criteria provided for traffic impacts is subjective. Specific details will need to be provided on how each of the ratings were assigned. Relatively minor, relatively moderate, and relatively major traffic impacts need to be better defined.

Please note that professionally prepared Traffic Impact Studies may be required on future submittals.

Construction Duration / Relative Constructability

The construction duration and relative constructability evaluation criteria is shown to be based on several factors. These include route complexity, available construction corridor/access and terrain challenges. More information will need to be provided on how the specific ratings were assigned. Currently, the estimated duration of construction for each alternative is the only information provided to support the rankings assigned for this criteria.

If this proposal were to be approved, the applicant will need to prepare final design plans and specifications for alignments within the ROW for review and approval by the Larimer County Engineering Department. Should it be discovered that the final design, in the County Engineer's opinion, deviates significantly from the conceptual alignment to change the nature of impacts of the pipeline within the permit limits, the County reserves the right to require that the design and alignment be modified to address infrastructure and property impacts as deemed necessary by the County Engineering Department.

The applicant should also expect to submit a geotechnical subsurface investigation to Larimer County during the design process for those portions of the alignment to be within County road ROW, to determine required trench backfill and compaction specifications, subgrade mitigation, and pavement design for areas disturbed by the pipeline installation.

During construction, the applicant shall stabilize and repave all pavements areas disturbed or damaged during pipeline installation in accordance with the Larimer County Urban Area Street Standards for work areas within the Growth Management Area (GMA) or Larimer County Rural Area Road Standards for work areas outside the GMA as directed by the County. It is also expected that if pipeline construction activities involve more than 100 lineal feet of disturbance, the applicant shall be responsible for pavement repairs and patching/overlay extending to the full limits (width) of the existing pavement.

It is to be understood that the following conditions will apply to any construction activities associated with this proposal. This is not a comprehensive list. Additional requirement may be added during the review of future submittals.



- The applicant shall reimburse Larimer County for costs associated with County-provided construction observation/inspection staff and/or independent, supplemental geotechnical or materials testing deemed appropriate by the County Engineer for purposes of quality assurance/control. The applicant shall also reimburse Larimer County for time and expenses incurred with project coordination, design review, permit review and processing and related project activities during the duration of project construction and closeout for the work conducted in unincorporated Larimer County.
- The applicant shall acquire all necessary permits required for construction. These may include, but are not limited to, Development Construction Permits, Building Permits, ROW Permits, Access Permits, Floodplain Development Permits, Utility Permits, Storm Water Management Permits, and all applicable State and Federal Permits.
- The applicant shall always allow for or ensure access to Larimer County for inspections and construction observation throughout the corridor and for the term of the construction project.
- The applicant shall construct the pipeline in phases, subject to phasing plans to be approved by Larimer County Engineering Department. Maximum open trench lengths will be defined in consultation with the applicant and are subject to approval by Larimer County Engineering Department.
- The applicant shall develop and provide Larimer County with accurate as-built horizontal and vertical survey data (state plane coordinates and elevations in NAVD 88) and GIS shapefiles describing the location of the pipeline and all appurtenant structures.
- The applicant shall provide Larimer County with as-built construction drawings certified by a Colorado registered professional engineer, for all portions of the pipeline located in unincorporated Larimer County.
- The applicant shall provide to Larimer County a pre-project video capturing existing conditions of the proposed water line installation corridor in and near the existing road right-of-way.
- The applicant shall establish and maintain a website with daily updates on the project describing the status of the project and the traffic impacts for that day, and the upcoming week.
- The applicant shall provide a public information contact with a phone number and email address that the public can contact to ask questions, express concerns or for project updates.
- Acceptable work days and hours for the project are subject to approval by the County Engineering Department.



- Material test reports, as per Larimer County Standard, must be submitted to and approved by Larimer County for any work to take place within County road ROW.
- If a relocation of the pipeline should in the future be desirable to accommodate some other or enlarged use of the County road right-of-way by any party or entity other than the County, and provided that the applicant agrees to such relocation, then all expenses of such relocation shall be paid for entirely by the party or entity desiring such relocation. If the relocation is to be made at the request of the County to accommodate changes in or improvements of public roadways or associated infrastructure, and not for purposes of accommodating any third party, then the applicant shall provide for pipeline relocations at the their own cost on a reasonable schedule established by the County Engineering Department.
- The applicant shall comply with maximum decibels for construction activities as outlined in the Larimer County Noise Ordinance. Any exceptions to these parameters must be approved by Larimer County.
- The applicant shall submit a noise mitigation plan with the final design plans of the Corridor outlining control methods that will be implemented during construction amongst residences.
- Larimer County Engineering staff shall be invited to attend regularly scheduled coordination meetings during construction - at a frequency to-be-determined - to understand planned construction activities and stay abreast of issues arising from construction impacts to County infrastructure or the public.

Required Trenchless Crossings

The Trenchless Crossing Criteria evaluates each alternative based on the total number of potential trenchless crossings. It appears that the proposed trenchless crossings have been limited to major highways and railroad crossings.

As per Section 12.1.2 of the Larimer County Rural Area Road Standards, "It is the policy of Larimer County to require the installation of new utilities across existing roads to be done by boring or tunneling. Open cutting of existing roads for the installation of new utilities will be permitted only when it can be proven it is not possible to use boring or tunneling techniques."

The applicant shall revise the assigned rankings for the Trenchless Crossings Evaluation Criteria to reflect the requirements shown in the above mentioned standard.

Operation and Maintenance (O&M) Access

Additional information will need to be provided with future submittals that discusses how the proposed pipeline sections located within County ROW will be accessed for maintenance and operation.




Route Evaluation & Staff Recommendation:

Engineering has reviewed this submittal at a conceptual level and additional information is required. The information submitted does not contain the level of detail required for the Larimer County Engineering Department to adequately evaluate the proposed alternatives.

The Larimer County Engineering Department cannot recommend approval of this proposal until the above comments have been addressed and our department has reviewed and approved the additional information. In addition, the applicant shall provide written responses to the above comments on the next submittal. The applicant should be aware that our department has based the comments on the submitted information and once the additional information has been submitted, we may have additional comments.

Please feel free to contact me at (970) 498-5715 or e-mail me at srothwell@larimer.org if you have any questions. Thank you.

MEMORANDUM

TO: Rob Helmick, Larimer County Planning Department
FROM: Steven Rothwell, Larimer County Engineering Department 
DATE: October 22nd, 2019
SUBJECT: Northern Integrated Supply Line (NISP) Intergovernmental Agreement (IGA), File #19-ZONE2551 – 2nd Submittal

Project Description/Background:

Northern Water has requested an Intergovernmental Agreement for the Northern Integrated Supply Project, as authorized by the County's 1041 regulations (Sec.14). The local elements of the proposed project include the reservoir's appurtenant elements and public recreation, water pipelines, and Highway 287 relocation.

Review Criteria:

The intent of this review is to evaluate the completeness of this submittal and its contents conformity to the requirements of the Larimer County Land Use Code (LCLUC). The materials submitted need to provide adequate information to accurately assess the drainage and transportation aspects for the site and how these aspects may impact the surrounding area. Larimer County Engineering Department development review staff members have reviewed the materials that were submitted to our office under these guidelines and per the criteria found in the Larimer County Land Use Code (LCLUC), Larimer County Urban Area Street Standards (LCUASS), Larimer County Rural Area Roadway Standards (LCRARS), Larimer County Stormwater Design Standards (LCSDS), and pertinent Intergovernmental Agreements.

Comments:

Thank you for providing your response to our comments. It appears that the information included with your response answer the questions presented with our Review Memorandum dated July 30th, 2019. This being said, staff cannot yet make a recommendation on whether or not Northern's preferred alignment shown in the revised Technical Memorandum No. 3 is the best available alternative or whether or not the draft Intergovernmental Agreement adequately addresses our concerns.



Staff requests that Northern provide GIS Shape Files or an acceptable alternative for the alignments shown in the revised Technical Memorandum No. 3. The illustrations and figures provided make it difficult to identify the potential impacts that each alternative may have on the immediately surrounding area.

Intergovernmental Agreement (IGA) Comments:

While we continue to review the provided material, staff has the following comments relating to the Draft IGA.

Staff has concerns with the wording of the Local Measures included with the Draft IGA. Northern's response comments note that the conditions listed in our Review Memorandum dated July 30th, 2019 are included in the Draft IGA as a Local Measure. However, the wording of these conditions have been changed on a few occasions that alter both their purposed and the extent of their applicability. These will need to be revisited to ensure that their original purpose and applicability are still being met.

Staff has concerns with Local Measure A, specifically when it addresses what deviation will be allowed to the conveyance pipeline alignments before further review will be required by Larimer County. Staff will require that alignment adjustments that would deviate more than 25 feet in either direction from the alignment shown, that would move closer to an existing structure, or that would move into an existing or future road right-of-way corridor (as determined by road functional classification) be subject to Larimer County Review.

The review processes for the recreation improvements need to be revisited. The recreation facilities and infrastructure associated with these facilities will be subject to our Site Plan review process. Following the site plan review process, a Development Construction Permit will also be required for the recreation improvements. The Development Construction Permit and other applicable permits are described in more detail below.

Permits:

Northern's staff has requested that Larimer County provide a list of the necessary permits for specific aspects of NISP. Please see the following list of the applicable Larimer County permits and their details. This list only encompasses the applicable permits issued by the Larimer County Engineering Department. Additional permits may be required by other County departments.

Development Construction Permit (DCP)

As stated previously, the Recreation Facilities will require both Site Plan review and a Development Construction Permit.

A Development Construction Permit (DCP) is required prior to the commencement of any improvements associated with an approved project. The permit is required to construct both public and private infrastructure improvements that are a result of the Land Use Application review and approval process. Staff uses the DCP to coordinate



the construction process of development related improvements in Larimer County and to assure the adequate completion of all improvements required to serve the project.

Right-of-Way (ROW) Construction Permit

Right-of-Way construction permits will be required any time work is to be completed within Larimer County ROW. The number of permits required will greatly depend on the number of instances that work is happening within Larimer County ROW and the extent of the impacts to the ROW as part of that work. Construction plans will need to be provided detailing the work to be completed.

Additionally, a Traffic Control Plan, developed by a certified traffic control company, must be submitted for all work performed within road rights-of-way, or that will directly affect the travelling public. Lastly, prior to commencement of any work, any contractors working within the ROW shall forward Certificates of Insurance to Larimer County Risk Management, 200 W. Oak St., #4000, Fort Collins, Colorado 80521. The insurance required shall be procured and maintained in full force and effect for the duration of the Contract and shall be written for not less than the amounts specified by Risk Management.

Access Permit

Larimer County regulates access to county roads to maintain safe traffic flow, road drainage facilities, and efficient use of the County's roads. An access is defined as any driveway that provides vehicular access to or from any County right-of-way.

Requirements for accesses can be found in the Urban Area Street Standards for areas included in city urban growth areas, and Rural Area Road Standards for rural properties.

Access Permits will be required for any new access from Larimer County ROW regardless of whether they are to be used for temporary construction purposes or are to be permanent. In addition to new accesses, Access Permits may also be required for existing access points if they are to be affected in anyway as a result of this proposal.

Staff is in support of Northern submitting a Traffic Control and Management Plan as described in Local Measure L. However, it should be noted that individual permits may be required in addition to this plan for internal tracking purposes.

Municipal Separate Storm Sewer System (MS4) Permit

The Draft IGA currently states that Northern will develop a plan that addresses how erosion and sediment control and water quality will be managed during and after construction. Please note that any proposed work within the Larimer County MS4 boundary will be subject to the County's MS4 permit requirements.

Floodplain Permit



As a participant in the National Flood Insurance Program (NFIP), Larimer County enforces floodplain regulations in accordance with the Federal Emergency Management Agency (FEMA) and the Colorado Water Conservation Board (CWCB). As such, any work that falls within a regulatory floodplain must comply with County floodplain regulations. Section 4.2.2.D.21 of Larimer County Land Use Code also requires that pipelines within a regulatory floodplain be processed as a floodplain special review and obtain approval from the Larimer County Flood Review Board and the Board of County Commissioners prior to construction. This process can take several months and requires completed design plans, hydraulic analyses, and the submittal of federal and state permits required for construction.

Please contact Devin Traff (970-498-5731; dtraff@larimer.org) for additional information on this process.

Route Evaluation & Staff Recommendation:

As stated previously, staff cannot yet make a recommendation on whether or not Northern's preferred alignment shown in the revised Technical Memorandum No. 3 is the best available alternative or whether or not the draft Intergovernmental Agreement adequately addresses our concerns.

Engineering will continue to review the submitted materials and will work with Northern's staff to address deficiencies if any are found in either the Technical Memorandum or Draft IGA. Staff reserves the right to request additional information if we deem it necessary for our review.

Please feel free to contact me at (970) 498-5715 or e-mail me at srothwell@larimer.org if you have any questions. Thank you.

MEMORANDUM

TO: Steven Rothwell, Larimer County Planning Department

FROM: Devin Traff, Larimer County Engineering Department *DT*

DATE: May 19, 2020

SUBJECT: NISP Floodplain Review Comments

Review Criteria:

Review of the supplied materials has been completed per the criteria found in the Larimer County Land Use Code (LCLUC) Section 4.2.2.

Floodplain Comments:

A. General Comments:

1. Floodplain Permits. All work proposed within a regulatory floodplain as a part of the NISP project must obtain a Floodplain Development Permit from Larimer County prior to construction. This can be accomplished through the issuance of one (1) floodplain development permit for the NISP project as a whole, but all work must be adequately documented through the submittals discussed in the following section and meet applicable floodplain regulations.
2. Floodplains Impacted by NISP. Several flood studies have been or are currently being performed for flooding sources impacted by the NISP project including the FEMA Flood Insurance Study (FIS), the Risk Mapping, Planning and Assessment (RiskMAP) study, and the Colorado Hazard Mapping (CHAMP) study. It is important to keep in mind that Larimer County regulates to the most restrictive of these studies and, therefore, all studies should be accounted for in the floodplain permitting reports and analyses. In the review of this project, the following floodplains are impacted by the project:
 - Glade Release Pipeline
 - Cache La Poudre Zone A (FEMA) upstream of Watson Lake and west of US 287
 - Northern Tier Pipeline
 - Cache La Poudre Zone A (FEMA) upstream of Watson Lake and west of US 287
 - Dry Creek Zone A (FEMA) north of CR 56. The pipeline crosses the floodplain.

- Boxelder Zone AE (FEMA & RiskMAP) south of CR 54 and east of I-25. The pipeline crosses the floodplain, impacting both floodway and flood fringe.
 - Poudre Intake Pipeline
 - Cache La Poudre Zone AE (FEMA & RiskMAP). The pipeline impacts both floodway and flood fringe in Fort Collins and Larimer County. *Note: 1st Sub No. 11 Pipeline Report states that pipeline east of South Timberline Drive until just west of South Summit View Drive is only in Fort Collins, but there is a section south of Cherly Street that is within Larimer County.
 - Dry Creek Zone AE (FEMA & RiskMAP). The pipeline crosses the floodplain and impacts both floodway and flood fringe south of Mulberry and west of Timberline.
 - Boxelder Zone AE (FEMA). The pipeline impacts both floodway and flood fringe west of I-25, but appears to be within City of Fort Collins limits.
 - County Line Pipeline
 - Cache La Poudre Zone AE (FEMA & RiskMAP). The pipeline crosses the floodplain and impacts both floodway and flood fringe.
 - Big Thompson Zone AE (FEMA & CHAMP). The pipeline crosses the floodplain and impacts both floodway and flood fringe. This portion of the line appears to be currently proposed within Weld County. Any alignment changes affecting regulatory floodplains in Larimer County would need to address Larimer County floodplain regulations.
3. No-Rise Analyses & Certification. Per Larimer County Land Use Code Section 4.2.2.F.1, projects proposed within a regulatory floodway must demonstrate that any and all work (e.g. pipelines, water control structures, etc.) will not produce an increase in base flood elevations (BFEs) and not cause adverse impacts to any existing structures via an engineering analysis and no-rise certification which are signed and stamped by a licensed Colorado Professional Engineer. Currently, the submittals provided with the 1041 application do not demonstrate such, nor is a no-rise certificate provided. The comments in the following section outline the submittal requirements necessary for meeting this requirement.
 4. CLOMR/LOMR Requirements. If a no-rise condition is not feasible, a Conditional Letter of Map Revision (CLOMR) must be submitted and approved by the Larimer County Flood Review Board (FRB) and the Federal Emergency Management Agency (FEMA) prior to construction and a Letter of Map Revision (LOMR) must be submitted to the FRB and FEMA within 90 days following construction. No insurable structures may be impacted by a rise created by NISP. If the project causes a drop in base flood elevations (BFEs) which equal or exceed 0.3' (but a no-rise condition is maintained), a Letter of Map Revision (LOMR) must be submitted to the FRB and FEMA within 90 days following construction.
 5. Scour Analyses and Channel Migration. Future submittals should address potential scour and channel migration in the event of a 1% annual chance flood event and any necessary protection measures for the pipeline, water control structures, and other

proposed facilities which are located in the 1% annual chance floodplain (100-year floodplain).

6. Larimer County Flood Review Board (FRB) & Board of County Commissioner (BCC) Determination. Pipelines and water control structures proposed as a part of NISP must undergo review by the FRB as a Floodplain Special Review (FPSR) under Section 4.2.2.D.21 of the Larimer County Land Use Code. FPSRs are recommended for approval or denial by the FRB to the BCC at a land use hearing following the FRB meeting. The BCC can exercise its discretion on whether to approve or deny the FPSR application. The Flood Review Board meets on the fourth Thursday of each month, and submittals to the Board should be received at least six (6) weeks prior to the meeting. Once all comments have been addressed, eight (8) hardcopies and one (1) electronic copy of all materials must be submitted for distribution to the Flood Review Board.
- B. Project Submittals: The following items have been identified as items which either have not been submitted or additional information is necessary for floodplain review.
1. Floodplain Development Permit (FDP) Application Form. Complete and submit an FDP application with all required information. The FDP application form has been included with this memorandum.
 2. Construction Plans. Construction plans, stamped and signed by a licensed Colorado Professional Engineer (PE), must be provided and include, at a minimum, the following information:
 - Plan view(s) showing the following:
 - Site layout showing locations and dimensions of all proposed water control structures (e.g. Glade Unit Diversion Structure, Poudre Intake Structure) and pipeline alignments with pipe dimensions, sizes, and details included and clearly labeled
 - Horizontal alignment of the pipeline
 - Stream channel
 - Floodplain boundaries (FEMA, CHAMP, and RiskMAP) with all flood zones labeled (including floodways). See above for impacted floodplains.
 - Existing structures, roads, bridges, stream crossings, or other hydraulically significant elements in the vicinity of, or pertinent to, the project
 - Base Flood Elevations (BFEs), in feet referenced to the NAVD 88 vertical datum, for all regulatory floodplain cross-sections impacted by the project
 - Vertical and horizontal datum
 - Profile. The vertical profile (proposed and existing, if replacement) must be provided for all pipelines and all water control structures, and should show both the existing and proposed grade and any scour protection measures (e.g. riprap).
 - Grading Plans. Grading plans must be submitted which clearly show:
 - Existing and proposed contours
 - Limits and total area of disturbance

- Scour protection measures (e.g. riprap placement)
 - Vertical and horizontal datum
 - Erosion Control Plan. An erosion control plan must be submitted which shows all temporary and permanent best management practices required by the Larimer County MS4 and CDPHE Stormwater Discharge Permit. Contact Shelley Bayard De Volo (970-498-5738) or Tina Kurtz (970-498-5732) for information regarding MS4 permit requirements.
3. Hydraulic Report. Two floodplain reports were submitted in Technical Memorandum No. 11 within the 1041 Application: (1) 1st Sub. No. 11 Glade Unit Floodplain Study and (2) 1st Sub. No. 11 Pipeline Floodplain Report. However, several items need to be addressed in the reports and additional data/modeling is required for review by the Larimer County Flood Review Board.
- General Comments
 - The reports must be certified by a licensed Colorado Professional Engineer
 - Both reports must adequately justify a no-rise certification for all portions within a floodway zone (Zone AE) and demonstrate adequate scour protection for portions within a 1% annual chance floodplain (floodway or flood fringe). Ideally, both reports would be consolidated into one which encompasses the entire project. See above if a no-rise condition is not feasible for the project.
 - Please ensure that all portions of the project which impact a regulatory floodplain are adequately addressed in the floodplain reports. See above for regulatory floodplains identified as impacted by NISP.
 - Report Sections
 - Table of Contents: provide a table of contents which list all sections, figures, appendices, etc. with page numbers.
 - Project description/location: please provide vicinity/location maps which clearly show the location of all pipeline alignments, water control structures, and any additional floodplain work locations along with the affected regulatory floodplain boundaries. See above for floodplains impacted by the project.
 - Background: please identify all affected regulatory floodplains and the associated FEMA map panels for areas impacted the project. Describe any previous floodplain studies (e.g. CLOMRs or LOMRs) for the area.
 - Survey Information: identify the source of all topographic data and survey data used for the design or hydraulic analysis and state the horizontal and vertical datums utilized.
 - Hydrology: identify source and magnitude of all flow data used in the analyses
 - Hydraulics: identify hydraulic modeling software version, flow condition & regime, Manning's roughness values, expansion/contraction coefficients

and other parameters used in analysis. Discuss any deviations from existing studies such as alterations of cross-sections or parameters. Identify existing hydraulic structures along the river reach (e.g. bridges) in proximity to the pipeline or proposed water control structures. Provide a discussion of the scour analysis and necessary protection measures. Identify any assumptions utilized in the study.

- Results: discuss the results of the hydraulic study and provide a comparison of 1% annual chance event (100-year) water surface elevations pre and post-project and describe any changes due to proposed condition. Describe any adverse impacts to existing structures (e.g. homes) or the regulatory floodway and include a discussion of any necessary mitigation measures if required.
 - Review Criteria: describe any applicable regulatory criteria required to approve the project. These regulations include the 44 Code of Federal Regulations (CFR) 65.3, the Colorado Code of Regulations Section 2 408-1 (2 CCR 408-1), and Section 4.2.2 of Larimer County Land Use Code. Address how these regulations are appropriately met. Included with these comments is a copy of Larimer County's floodplain regulations for reference.
4. No-Rise Certification. A no-rise certification, certified by a PE, must be submitted. A copy of the no-rise certification template has been included with these comments.
 5. Hydraulic Model (e.g. HEC-RAS). Provide a copy of the hydraulic model(s) and the associated error reports (e.g. cHECK-RAS) used for the analyses.
 6. Pre/Post-Project Survey (PLS Stamped) for areas of the project where the no-rise certification will be justified by at-grade construction. If this method of justification is pursued for any portion of the project, a post-project field survey (PLS Stamped) will be required following construction.
 7. Scour Calculations. Scour calculations which support a scour analysis, certified by a PE, shall be submitted and adequately address the potential for scour and channel migration and any necessary protection measures
 8. Base Flood Elevation (BFE) Comparison Tables comparing pre and post-project BFEs for all regulatory floodplain cross-sections which will be impacted by the project
 9. Access or Ownership Agreements. Documentation must be submitted demonstrating ownership and/or access rights to the subject property on which the floodplain development will be performed
 10. Additional Permits/Approvals. Federal, state, or local permits or approvals required in addition to the FDP for the floodplain development must be submitted (e.g. CDPHE Stormwater Discharge Permit, 404 Permit, etc.)
 11. Fee in the amount of \$400 for a Floodplain Special Review

Attachments:

- Floodplain Permit Application Form
- No-Rise Certification Form
- Larimer County Floodplain Regulations (Section 4.2.2)

Staff Recommendation:

The comments provided above must be addressed as a Condition of Approval for the 1041 application. Please contact me at (970) 498-5731 or email me at dtraff@larimer.org if you have any questions.

cc: jstruble@northernwater.org
file



Loveland Fire Rescue Authority
Community Safety Division
410 East 5th Street
Loveland, Colorado 80537
Phone (970) 962-2537

TO: Larimer County Community Development, 200 W. Oak St., Fort Collins, Colo

FROM: Carie Dann, Deputy Fire Marshal, Loveland Fire Rescue Authority, phone 970.962.2518, email Carie.Dann@LFRA.org

RE: Northern Integrated Supply Project (NISP) Land Use Application (1041 Permit)

DATE: May 8, 2020

These comments pertain to a Land Use Application for the Northern Integrated Supply Project (NISP), a proposed water-supply project to serve 15 water districts in the Northern Colorado Front Range. The project consists of a water-storage reservoir north of Fort Collins, Colo.; transmission pipelines; and associated features. Seven miles of US Highway 287 will be realigned north of Fort Collins, due to inundation from the new Glade Reservoir.

The portion of the project within the Loveland Fire Rescue Authority (LFRA) jurisdiction consists of pipeline being placed in the northeast corner of the LFRA district.

LFRA will enforce the 2018 International Fire Code and its accompanying local ordinances. All fire department comments contained in this document and any future reviews, shall remain active until acknowledged by the applicant and resolved with LFRA.

INTERNATIONAL FIRE CODE REQUIREMENTS

1. The requirements of the Fire Code, Building Code (with regard to fire and life safety issues), and NFPA standards adopted at the time of building construction must be met.

LFRA APPROVAL

2. LFRA approves of this request, provided the following requirements are met:
 - LFRA shall be notified in advance of any road closures, road realignment or any other vehicular access obstructions in our district necessitated by this project, at least one week (five working days) prior to the closures, realignments or obstructions. Notification must be made via email to

Carie.Dann@LFRA.org and Eplan-Fire@LFRA.org, and by phone at 970-962-2200 (LFRA 911 Dispatch Center) and 970-962-2537 (LFRA Community Safety Division).

- LFRA shall be notified in advance of any water main or hydrant disruption in our district necessitated by this project, at least one week (five working days) prior to the disruptions. Notification must be made via email to Carie.Dann@LFRA.org and Eplan-Fire@LFRA.org, and by phone at 970-962-2200 (LFRA 911 Dispatch Center) and 970-962-2537 (LFRA Community Safety Division).

TO: Rob Helmick, Senior Planner, rhelmick@larimer.org,

FROM: Andrew Rosen, Fire Protection Technician, arosen@poudre-fire.org

PROJECT: Northern Water-Northern Integrated Supply Project @ Glade Reservoir

LARIMER COUNTY CASE NUMBER: 20-ZONE2657

DESCRIPTION: Northern Integrated Supply Project (NISP) is a 1041 Permit under the Larimer County Land Use Code Section 14.4.J, approval for Northern Tier, Poudre Delivery/Intake And County Line raw water lines, and Section 14.4.K water storage reservoir (Glade Reservoir) including recreation facilities and other appurtenant facilities to both the pipelines and reservoir. Pipelines -- From northwest of Fort Collins east to the Weld County line and from the Poudre River at Hwy 14 in Fort Collins then east roughly following CR40/Prospect to the Weld County Line then south to the south county line at Johnstown.

COMMENT DATE: 5-8-2020

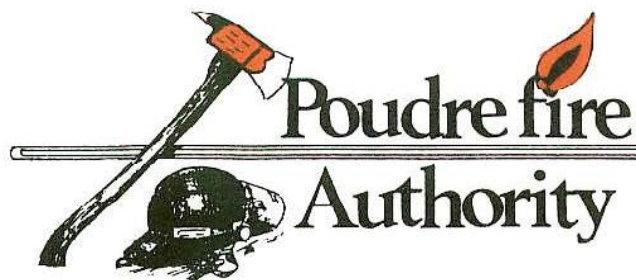
APPLICANT: Carl Brouwer, cbrouwer@northernwater.org

OWNERS: Northern Water Conservancy District, jstruble@northernwater.org

All PFA comments will remain active until acknowledged and resolved by applicant

Poudre Fire Authority (PFA) submitted comments on July 23rd 2019 regarding the Northern Integrated Supply Project (NISP) but the Project Team has not acknowledged or resolved any of the comments referenced at that time.

The prior comments are attached to this email and all are still outstanding until such time as they are acknowledged and resolved by the applicant.



102 Remington Street
Fort Collins, CO 80524

Phone: 970-221-6570
Fax: 970-221-6635
Internet: www.poudre-fire.org

TO: Rob Helmick, Senior Planner, rhelmick@larimer.org, 970-498-7682

FROM: Jim Lynxwiler, Fire Protection Technician, jlynxwiler@poudre-fire.org 970.416.2869

PROJECT: Northern Water – Northern Integrated Supply Project @ Glade Reservoir

LARIMER COUNTY CASE NUMBER: 19-ZONE2551

LOCATION: +2.5 square mile area north of Ted's Place on existing US Hwy 287.

DESCRIPTION: Northern Water has requested an Intergovernmental Agreement for the Northern Integrated Supply Project, as authorized by the County's 1041 regulations (Sec. 14). The local elements of the proposed project include the reservoir's appurtenant elements and public recreation, water pipelines, and Highway 287 relocation.

COMMENT DATE: July 23, 2019

CC: Carl Brouwer, Christie Coleman, Stephanie Cecil at Northern Water

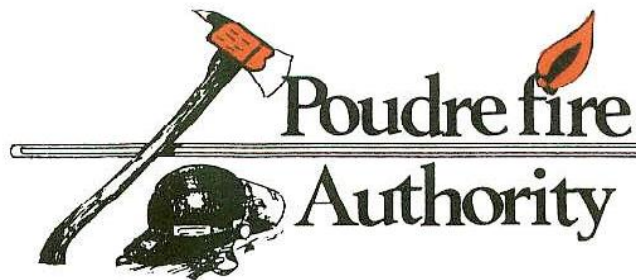
PFA COMMENTS: Fire department comments are provided at this time so as to assist with general site planning and construction coordination. Review and comment by Poudre Fire Authority (PFA) is a requirement for Site Plan approval. Poudre Fire Authority and Larimer County are currently working from the 2018 International Fire and Building Codes. Building plan reviews shall be subject to the adopted version of the fire code in place at the time of plan review submittal and permit application.

PFA assumes Northern Water will work to identify and mitigate all known or potential hazards to life and safety within the scope of project either identified now or through subsequent discovery. All associated private development on or near the site (eg. restaurants, fuel stations, convenience stores, etc.) will require separate site plan approval and permitting. Please contact PFA with any questions or to schedule a meeting to discuss any topic(s) herein.

OPERATIONAL IMPACT OF PROJECT ON EMERGENCY RESPONSE TIMES

The closest staffed fire station is PFA Fire Station #7, located at 2817 N Overland Trail in Laporte, CO.

- The Master Plan for Glade Reservoir as currently shown does not indicate a direct impact to emergency response times or limitations for response vehicles to the south end of the reservoir.



102 Remington Street
Fort Collins, CO 80524

Phone: 970-221-6570

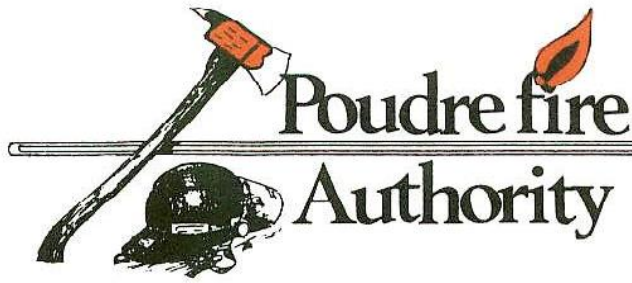
Fax: 970-221-6635

Internet: www.poudre-fire.org

- Realignment of US Hwy 287 does not result in a negative impact to emergency response. The proposed connection at Hwy 14, just west of Overland Trail appears to indicate a more direct and therefore shortened response time to incidents on US 287 north of Glade Reservoir.
- Emergency response to water related incidents on Glade Reservoir are not yet clear. The boat ramp at the south end is understood; however, PFA requires further details regarding other potential points of access, either at the north end or along the east shore. Providing no other access points would be grossly insufficient. Further discussion on this topic will be needed.
- Emergency response to incidents on the west side of the reservoir remains a matter of concern. The creation of Glade Reservoir appears to make currently accessible areas, much less accessible while simultaneously promoting use and a potential increase for incidents. Accessibility to wildland fire events or backcountry medical calls needs to be a point of discussion between Northern Water and Poudre Fire Authority.

GENERAL FIRE ACCESS REQUIREMENTS FOR ALL PORTIONS OF PROJECT

- Approved fire Lanes shall be provided for every facility, building or portion of a building hereafter constructed within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of any building as measured by an approved route around the exterior of the building or facility. This access requirement shall apply to all areas of the Glade Reservoir Master Plan.
- Emergency access and apparatus staging areas shall be designed and constructed to all recreational areas. These access points shall be predetermined and preplanned through discussions with PFA so as to be effective and strategically placed.
 - Boat ramps & waterways
 - Dam & pump station
 - Visitor Center
 - Campgrounds
 - Trailhead parking/parking lots
- Emergency access points shall be provided to all areas susceptible to wildland fire to the fullest extent possible. As already stated, this is especially important on the west side of Glade Reservoir. Fire access via brush trucks (oversized pickup) may correspond with the hiking trail. Further discussion on this topic will be necessary.
- Wherever security requires access to be restricted, emergency access to gates shall be provided at all critical areas. Details TBD through the site approval process.



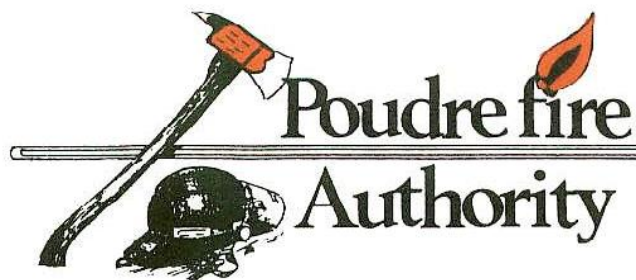
102 Remington Street
Fort Collins, CO 80524

Phone: 970-221-6570
Fax: 970-221-6635
Internet: www.poudre-fire.org

FIRE LANE SPECIFICATIONS

A fire lane plan shall be submitted for approval prior to installation. In addition to the design criteria already contained in relevant standards and policies, any new fire lane must meet the following general requirements:

- Fire lanes required on private property shall be dedicated by plat or separate document as an Emergency Access Easement. Dedicated fire lanes are required to connect to the Public Way unless otherwise approved by the AHJ.
- Maintain the required 20 foot minimum unobstructed width & 14 foot minimum overhead clearance. Where road widths exceed 20 feet in width, the full width shall be dedicated unless otherwise approved by the AHJ.
- Drivable grades shall not exceed 10% in any area. Grades intended for parking of fire apparatus shall not exceed 6% unless otherwise approved by the AHJ.
- Be designed as a flat, hard, all-weather driving surface capable of supporting 40 tons.
- Dead-end fire access roads in excess of 150 feet in length shall be provided with an approved turnaround area for fire apparatus.
- Unless otherwise approved, dead-end roads shall not exceed 660' in length without providing for a second point of access. Dead-end access roads in excess of 1320 feet in length require a third point of access. Dead-end access roads in excess of 2640 feet in length require a fourth point of access.
- The required turning radii of a fire apparatus access road shall be a minimum of 25 feet inside and 50 feet outside.
- Be visible by red curb and/or signage, and maintained unobstructed at all times. Sign locations or red curbing should be labeled and detailed on final plans. Refer to LCUASS detail #1418 & #1419 for sign type, placement, and spacing. Appropriate directional arrows required on all signs.
- Additional access requirements exist for buildings greater than 30' in height. Refer to Appendix D of the 2015 IFC or contact PFA for details.
- ***In remote rural applications, fire lane standards may be modified with the approval of the fire marshal; examples would include reduction in dead-end length, road width or road surface.***



102 Remington Street
Fort Collins, CO 80524

Phone: 970-221-6570

Fax: 970-221-6635

Internet: www.poudre-fire.org

FIRE HYDRANTS

Fire hydrants are required within 300' of any building and otherwise at 800' feet intervals along a fire access road. The Glade Reservoir will need to provide hydrants at critical locations (TBD) but PFA will consider allowing for a reduction in hydrant placement within the road network. This can be another point of discussion as part of Site Plan approval.

VISITOR CENTER

A Visitor Center is proposed at 4,000-6,000 square feet.

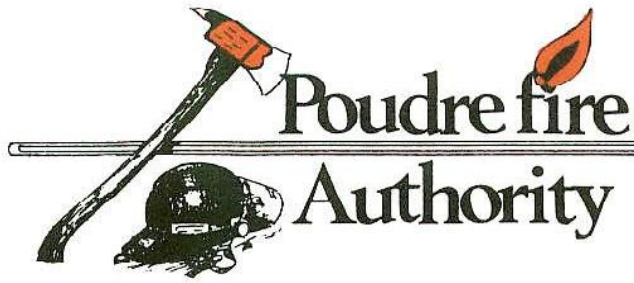
- A fire hydrant capable of providing 1500 gpm at 20 psi residual pressure is required within 300' of the building. At time of Site Plan review, fire hydrants may be required in other areas (as described above).
- A fire lane is required within 150' of any exterior portion of the building's first floor, as measured by an approved path around the perimeter. A staging area and turnaround will be required to support established fire lane standards (as provided above).
- Buildings greater than 5,000 sq. ft. in area required fire containment construction to limit fire areas to less than 5,000 sq. ft. OR installation of an automatic fire sprinkler system in all areas of the building. Keep in mind that other conditions may trigger the installation of a fire sprinkler system including: offset to lack of access, offset to lack of hydrant, or an assembly occupant load greater than 99 persons.
- Building plans shall be submitted to PFA separately for review and permitting.

SIGNAGE & ROUTE FINDING

The network of drive lanes at the camping and recreational sites shall be equipped with wayfinding signage at junctures to aid in rapid response to all areas of the site. A plan for wayfinding and sign posting should be submitted for approval with the Site Plan.

PRIOR TO CONSTRUCTION

To ensure that PFA is able to meet minimum benchmarks for emergency response during all phases of buildout, project coordination meetings between Northern Water and PFA will be required prior to commencement of any phase of the project (TBD). Periodic status/update meetings will also be required throughout all phases of construction.



102 Remington Street
Fort Collins, CO 80524

Phone: 970-221-6570

Fax: 970-221-6635

Internet: www.poudre-fire.org

DURING CONSTRUCTION

In order to provide effective fire and medical response, Poudre Fire Authority shall require emergency access to be maintained at all active areas of construction throughout the duration of this project. Critical areas include, but are not limited to, pipeline construction, dam and facility construction, visitor's center and campground construction. This will require coordination meetings between project representatives and the fire code official prior to the start of any project phase. Refer to fire access standards (above).

EDUCATION OUTREACH

As part of the project's stated goal to provide education outreach, PFA would like to participate in providing information on related topics as:

- Wildland fire prevention
- Hiker safety/first aid
- Boating safety



Katie Beilby <beilbykm@co.larimer.co.us>

Fwd: REFERRAL RESPONSE: Larimer County Planning Referral Update 20-ZONE2657

Rob Helmick <helmicrp@co.larimer.co.us>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Thu, Jun 4, 2020 at 2:48 PM

----- Forwarded message -----

From: **Mandy O'Regan** <Moregan@timnathgov.com>

Date: Wed, Apr 1, 2020 at 1:44 PM

Subject: REFERRAL RESPONSE: Larimer County Planning Referral Update 20-ZONE2657

To: rhelmick@larimer.org <rhelmick@larimer.org>Cc: Matt Blakely <mblakely@timnathgov.com>, Wesley LaVanchy <wlavanchy@timnathgov.com>, Eric Fuhrman <efuhrman@tstinc.com>, Kevin Koelbel <kkoelbel@timnathgov.com>, Don Taranto <dtaranto@tstinc.com>, Steve Humann <shumann@tstinc.com>, Mandy O'Regan <Moregan@timnathgov.com>

Mr. Helmick –

The Town of Timnath is pleased to submit the attached referral comments to you on the **1041 Permit Land Use Application** submitted by NISP Water Activity Enterprise in conjunction with Northern Water.

Please keep us informed on any future reviews for this project as more details become available.

If you have any questions regarding this response, please contact Matt Blakely, Timnath Community Development Director at 970.224.3211.

Thank you and I hope you have a wonderful day!

Mandy O'Regan

Planning Technician

Community Development Department

Town of Timnath

[4750 Signal Tree Drive](#)[Timnath CO, 80547](#)E-mail: moregan@timnathgov.com

Phone: 970-224-3211

From: Katie Beilby <beilbykm@co.larimer.co.us>

Sent: Wednesday, March 25, 2020 4:06 PM

BCC 08/17/20**NISP**

To: Rob Helmick <helmicrp@co.larimer.co.us>

Subject: Larimer County Planning Referral Update 20-ZONE2657



You are receiving this notice as a followup to the referral you received recently regarding the 1041 permit application made for the NISP project.

Because of the timing of the process and the current guidance from the Health Department, as well as the various emergency declarations, we want to be sure that you let us know if your

agency anticipates a delay or inability in responding or commenting on the referral.

We understand that you may have competing priorities and or are devoting resources to addressing this current situation.

Plan #: 20-ZONE2657

Request:

Northern Integrated Supply Project (NISP) is a 1041 Permit under the Larimer County Land Use Code Section 14.4.J,

approval for Northern Tier, Poudre Delivery/Intake And County Line raw water lines, and Section 14.4.K water storage reservoir (Glade Reservoir) including recreation facilities and other appurtenant facilities to both the pipelines and reservoir.

Pipelines -- From northwest of Fort Collins east to the Weld County line and from the Poudre River at Hwy 14 in Fort

Collins then east roughly following CR40/Prospect to the Weld County Line then south to the south county line at Johnstown.

Link to view Documents: https://onlineportal.larimer.org/EnerGov_Prod/CitizenAccess/Site/Plan/View/ByPlanNumber/20-ZONE2657

If you will need more time to comment or respond so that we may take appropriate steps regarding the processing of this application please advise, Rob Helmick, Senior Planner, by phone at (970) 498-7682 or by email at, rhelmick@larimer.org.

Kind regards,

Katie Beilby

Office Supervisor

Community Development Department

200 W Oak St, Fort Collins, 80522 | 3rd Floor

W: (970) 498-7719

beilbykm@larimer.org | www.larimer.org/planning

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Robert Helmick
Senior Planner

Community Development Department
200 West Oak Street, Suite 3100
PO Box 1190
Fort Collins, CO 80521
970-498-7682
rhelmick@larimer.org
<https://www.larimer.org/planning>



2020-04-01_Timnath Response to Larimer County NISP Proposal.pdf
186K

BCC 08/17/20

NISP



Katie Beilby <beilbykm@co.larimer.co.us>

Fwd: 20-Zone2654

Rob Helmick <helmicrp@co.larimer.co.us>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Thu, Jun 4, 2020 at 2:48 PM

----- Forwarded message -----

From: **Sandi Friedrichsen** <sfriedrichsen@wsfr.us>
Date: Thu, Mar 26, 2020 at 7:56 AM
Subject: 20-Zone2654
To: rhelmick@larimer.org <rhelmick@larimer.org>

We don't have any comments on the above project at this time. Please keep us in the loop in case anything changes.
Thank you!

Sandra Friedrichsen

Fire Marshal

Windsor Severance Fire Rescue

[100 7th Street - Windsor, CO 80550](#)

Main - (970) 686-2626

Email – firemarshal@wsfr.uswww.wsfr.us

--



Robert Helmick
Senior Planner

Community Development Department
[200 West Oak Street, Suite 3100](#)
PO Box 1190
Fort Collins, CO 80521
970-498-7682
rhelmick@larimer.org
<https://www.larimer.org/planning>



Katie Beilby <beilbykm@co.larimer.co.us>

Larimer County Planning Referral Update 20-ZONE2657

Nate Ensley <nensley@fclwd.com>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Mon, Mar 30, 2020 at 7:40 AM

Katie,

We performed our review on the conceptual documents and have no comments at this time.

Let us know if you need anything else.

Thanks!

Nate Ensley, PE
Fort Collins - Loveland Water District
South Fort Collins Sanitation District

(970) 226-3104 Ext 113

(480)358-5163 Cell

Due to the COVID-19 Pandemic and Declarations of Emergency by both FCLWD and SFCSD, our Mission Statement to provide "High Quality, Secure, Reliable and Affordable Water" requires us to prioritize our system operations over administrative activities. Please understand that we will do our best to respond in accordance with this mission statement. We appreciate your patience as we navigate through this event.

From: Katie Beilby <beilbykm@co.larimer.co.us>
Sent: Wednesday, March 25, 2020 5:55 PM
To: Rob Helmick <helmicrp@co.larimer.co.us>
Subject: Larimer County Planning Referral Update 20-ZONE2657



[Quoted text hidden]



Katie Beilby <beilbykm@co.larimer.co.us>

Fwd: 20-ZONE2657/NISP Pipelines/Larimer County/US 287

Rob Helmick <helmicrp@co.larimer.co.us>
To: Katie Beilby <beilbykm@co.larimer.co.us>

Fri, Jun 12, 2020 at 8:22 AM

----- Forwarded message -----

From: **Hice-Idler - CDOT, Gloria** <gloria.hice-idler@state.co.us>

Date: Wed, Mar 25, 2020 at 9:46 AM

Subject: 20-ZONE2657/NISP Pipelines/Larimer County/US 287

To: Rob Helmick <rhelmick@larimer.org>

Cc: Timothy Bilobran - CDOT <timothy.bilobran@state.co.us>, Allyson Mattson - CDOT <allyson.mattson@state.co.us>

The installation of any pipeline crossing CDOT right-of-way will require utility permits. Access from any state highway to install the pipeline will require access permits.

Gloria Hice-Idler
Rocksol Consulting

(970) 381-8629

cid:image001.png@01D05B52.DA3F45D0

10601 W. 10th Street, Greeley, CO 80634

gloria.hice-idler@state.co.us | www.codot.gov | www.cotrip.org



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Robert Helmick
Senior Planner

Community Development Department
200 West Oak Street, Suite 3100
PO Box 1190
Fort Collins, CO 80521
970-498-7682
rhelmick@larimer.org
<https://www.larimer.org/planning>



COLORADO
Department of Transportation
Region 4

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BCC 08/17/20**NISP**