

MEMO

To: Larimer County Planning Commission

From: Community Development Staff

Date: June 24, 2020

RE: Addendum to Staff Report for NISP 1041
File #20-ZONE2657

Attached to this memo please find the following information received by staff after June 9, 2020 and since the packet for the June 24th meeting was published and posted.

1. Public comments: Comments in the form of email strings, letters including Sierra Club, and correspondence to the ACOE from Save the Poudre
2. Applicant information: Supplemental information received from the applicant with respect to traffic and construction responding to initial staff comments
3. Referral Agency response: Comments from the Wellington Fire District – Access to 287 and water supply concerns

Public Comments

Meyer Glitzenstein & Eubanks LLP

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March 12, 2019

Via E-Mail

John Urbanic, NISP EIS Project Manager
U.S. Army Corps of Engineers, Omaha District
Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80128
nisp.eis@usace.army.mil

Re: Request For Supplemental NEPA Review By The Corps For The Northern Integrated Supply Project In Light Of Significant New Information Bearing On The Proposed Action

On behalf of the nonprofit organization Save The Poudre, I hereby request that the U.S. Army Corps of Engineers (“Corps”) conduct supplemental environmental analysis pursuant to the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321-4370m, by preparing a supplemental environmental impact statement (“SEIS”) or, at bare minimum, a supplemental environmental assessment (“EA”) to address and evaluate new circumstances and significant information relevant to this project and its environmental impacts. As explained below, **we request a response from the Corps by no later than March 29, 2019** informing Save The Poudre whether the Corps intends to conduct any supplemental NEPA review, and, if not, explaining the reasons why the Corps has declined to take this action.

BACKGROUND

I. STATUTORY AND REGULATORY FRAMEWORK

Congress created NEPA more than four decades ago “[t]o declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment” 42 U.S.C. § 4321. In light of this mandate, the Supreme Court has reasoned that NEPA is “intended to reduce or eliminate environmental damage and to promote ‘the understanding of the ecological systems and natural resources important to’ the United States.” *Dep’t of Transp. v. Pub. Citizen*, 541 U.S. 752, 756 (2004) (quoting 42 U.S.C. § 4321).

In achieving NEPA’s substantive goals, Congress created two specific mechanisms through which federal agencies must evaluate the environmental and related impacts of a



particular federal action—an EIS and an EA. *See* 42 U.S.C. § 4332(c). These procedural mechanisms are designed to inject environmental considerations “in the agency decisionmaking process itself,” and to “‘help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment.’” *Pub. Citizen*, 541 U.S. at 768-69 (emphasis added) (quoting 40 C.F.R. § 1500.1(c)). Therefore, “NEPA’s core focus [is] on improving agency decisionmaking,” *Pub. Citizen*, 541 U.S. at 769 n.2, and specifically on ensuring that agencies take a “hard look” at potential environmental impacts and environmentally enhancing alternatives “as part of the agency’s process of deciding whether to pursue a particular federal action.” *Balt. Gas & Elec. Co. v. Nat. Res. Def. Council*, 462 U.S. 87, 100 (1983). The alternatives analysis “is the heart” of an EIS or EA. 40 C.F.R. § 1502.14. NEPA’s implementing regulations require that the agency “present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.” *Id.*

An EIS must be prepared by an agency for every “major Federal action significantly affecting the quality of the human environment.” 42 U.S.C. § 4332(c). Under the Council on Environmental Quality’s (“CEQ”) regulations that implement NEPA, “significance” requires consideration of both context and intensity. Where a significant environmental impact is not expected, the agency must still prepare an EA and a Finding of No Significant Impact (“FONSI”). *Id.* §§ 1508.9, 1501.3. Where an EA or EIS has been previously prepared, NEPA’s regulations require an agency to supplement its prior NEPA review when “[t]he agency makes substantial changes in the proposed action that are relevant to environmental concerns,” or “[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.” 40 C.F.R. § 1502.9(c).

II. FACTUAL BACKGROUND

The Corps commenced its decisionmaking and NEPA review process for the Northern Integrated Supply Project (“NISP”) in August 2004. *See* Corps, *Environmental Impact Statement – Northern Integrated Supply Project*, <https://www.nwo.usace.army.mil/Missions/Regulatory-Program/Colorado/EIS-NISP/>. The Corps issued its Draft EIS in April 2008, its Supplemental Draft EIS in June 2015, and its Final EIS in July 2018. *Id.* According to the Corps’ project website, the agency intends to issue a Record of Decision (“ROD”) authorizing this project later this year (i.e., in 2019). *Id.*

It would be a major understatement to say that this project has engendered substantial controversy. Save the Poudre, affected municipalities such as the City of Fort Collins, and many other interested parties have submitted extensive comments criticizing myriad aspects of the Corps’ decisionmaking process including the agency’s impermissibly narrow purpose and need statement, the artificially constrained analysis of practicable alternatives, the use of inappropriate screening criteria in examining project alternatives, and major project impacts that have not been adequately analyzed. Those comments are all part of the public decisionmaking record.

DISCUSSION

Although the Corps evidently intends to issue its ROD later this year, the Northern Colorado Water Conservancy District (“Northern Water”)—i.e., the project proponent—recently made a major change in project operations that alters many of the basic assumptions underlying the NISP project and the ability of Northern Water to fill the proposed Glade Reservoir. On February 28, 2019, Northern Water revealed—for the first time ever—that, in order for NISP to be viable, Northern Water may have to purchase at least “25,000 acre-feet of water” from northern Colorado farmers, which Northern Water representatives estimate “would take about a decade and 100 or more farms, depending on their size.” Loveland Reporter, *Northern Water Buys First Farm for NISP Water* (Feb. 28, 2019), available at http://www.reporterherald.com/news/larimer-county/ci_32483944/northern-water-buys-first-farm-nisp-supply. Indeed, in purchasing its first water from a northern Colorado farm in furtherance of NISP, Northern Water spent \$330,000 to purchase a mere 30 acre-feet of water—i.e., \$11,000 per acre-foot. Even assuming other farms will sell to Northern Water at no more than this rate (a proposition that is far from certain), purchasing all of the required water would add an additional \$275 million in total project costs. *See id.* On the same day that local newspapers revealed this approach, Northern Water separately unveiled its new regime—called the WaterSecure program—and launched a website providing information about it. *See* Northern Water, *WaterSecure*, available at <https://www.northernwater.org/sf/nisp/watersecure>. For several reasons, these purchases would represent a wholesale change to the approach Northern Water will take to acquire the water for NISP, and is a fundamentally different and highly significant modification to the project that bears directly on the proposed action, its impacts, and its alternatives.

First, Northern Water’s new approach of purchasing some or all of the required 25,000 acre-feet of water from northern Colorado farms—i.e., more than 60% of the 40,000 annual acre-feet of water that Northern Water alleges is a necessary project component of NISP—has *never* been analyzed as part of the Corps’ Draft EIS, Supplemental Draft EIS, or Final EIS. To the contrary, the Final EIS makes clear that under Northern Water’s preferred alternative—as well all other action alternatives—“\$0” would be spent on “water rights acquisition.” Final EIS at 2-103. In contrast, the Corps estimated that under the *no-action* alternative, Northern Water would have to spend \$700 million on water rights acquisition by buying water rights from farms at approximately \$15,500 per acre-foot. *See* Final EIS at 2-102. Accordingly, because Northern Water’s new approach fundamentally transforms the preferred action and its underlying assumptions and operational mechanics, at minimum the Corps must prepare supplemental NEPA review disclosing to the public this new approach and soliciting public input on this substantial change.¹

¹ The Final EIS states that Northern Water already owns the water rights necessary to implement the preferred alternative. *See* Final EIS at 2-77 (“With the exception of Upper Galetton Reservoir as a point of storage for the SPWCP water right, *Northern Water owns the water rights with the necessary points of diversion and storage for Alternative 2M.*” (emphasis added)). Thus, the fact that Northern Water actually does *not* own some of these water rights—to the tune of 25,000 of annual acre-feet of water (more than half the water Northern Water claims to need from this project)—is a colossal change in the preferred alternative that alters the entire landscape of this project is a significant way.

Second, supplemental NEPA review is necessary because Northern Water’s new approach completely alters the baseline against which practicable alternatives are measured, especially in light of the significantly increased project costs. Even if Northern Water is able to buy 25,000 acre-feet at approximately \$11,000 per acre-foot—which is not certain given the fair market price for such water rights, *see* Final EIS at 2-102—this would add at least \$275 million to overall project costs, which means that certain alternatives previously dismissed due to higher costs might now be “practicable” when compared to the much higher costs of the preferred alternative in light of Northern Water’s new farm purchasing scheme. Given the new cost baseline for the project, the Corps must re-examine all practicable alternatives as judged against the new projected costs of Northern Water’s preferred alternative.²

Third, the Corps and Northern Water previously rejected alternatives that included as a component alternative agricultural transfer methods (including agricultural leasing), and did so by implementing faulty screening criteria for proven technology—i.e., rejecting the leasing of agricultural water on the purported grounds that such methods are technologically unproven. *See* Final EIS at A-115 (EPA comments advocating the consideration of alternative agricultural transfer methods). Now that Northern Water has dramatically changed course and *is* purchasing and/or leasing water from northern Colorado farms, the Corps must revisit the concept of alternative agricultural transfers and analyze other alternatives involving this concept that is, in fact, feasible as demonstrated by Northern Water’s selection of this new approach to acquire more than half of the water needed for this project to be viable.

Fourth, Northern Water’s significant change in operations for the preferred alternative necessarily modifies many of the key factors under NEPA related to this project, such as the purpose and need and whether the preferred alternative can even achieve the purported need for this project. In particular, since there is much uncertainty as to whether and when Northern Water would be able to achieve its goal of purchasing 25,000 acre-feet of water from northern Colorado farms, it is highly speculative as to whether the preferred alternative can provide 40,000 acre-feet of water (which is a requirement to satisfy the project’s stated need).³ The Corps

² The costs associated with NISP have grown exponentially since the beginning of this project. In 2008, the Corps estimated that the project would cost \$350 million. By the 2018 Final EIS, the Corps estimated that the project would cost \$1.1 billion—i.e., three times what the Corps estimated only ten years earlier. With Northern Water’s new approach, the estimated costs will increase at least another \$275 million and likely much more than that as farms sell their water rights at higher per-unit rates.

³ Northern Water has indicated that it intends to resell the purchased land, conditioned to allow the exchange to operate in perpetuity, and may claim that such transactions will allow them to make these purchases at zero cost. *See* Loveland Reporter, *supra* (“Eventually, the district plans to sell the farms to private owners, he said, with the stipulation that the water would stay with the property.”). Until such a time as Northern Water can provide signed contracts for resale of all of the purchased land, this approach remains speculative at best. Even if Northern Water was able to eventually resell all of the properties at favorable prices—which is far from certain—the project would incur substantial carrying costs associated with land ownership in the interim.

must analyze the likelihood that Northern Water will be able to acquire the rights to 25,000 acre-feet of water, the estimated costs of doing so, the anticipated time frame before such acquisition is completed, and what happens in the event that Northern Water is not able to acquire 25,000 acre-feet of water through this new approach.⁴

Fifth, the modeling conducted to date by the Corps and/or Northern Water is no longer accurate since the modeling assumptions previously used in assessing mass-balance water quality and return flow obligations fail to include any analysis of this new approach and how those projections change if Northern Water is (or is not) able to purchase 25,000 acre-feet of water from farms.

Sixth, there will be highly significant environmental impacts under Northern Water's new approach, in which the project proponent will separate Poudre river water from the land and replace it with South Platte water (then reselling and/or leasing the land to an irrigated agricultural user). Because of the multi-river issues inherent in this approach, there are myriad adverse effects to water quality, wildlife, and other aspects of the ecosystem that the Corps has not yet examined. The need for a "hard look" at these new impacts counsels in favor of supplemental NEPA review.⁵

Seventh, now that Northern Water's preferred alternative and the no-action alternative *both* involve as a key component the purchase of many acre-feet of water from farms, there is not an alternative that is genuinely distinct from the action alternatives. Because the Corps must include an analysis of a true no-action alternative—which must be conceptually distinct in terms of its components from the action alternatives—supplemental NEPA review is necessary to ensure that the agency explores a genuine no-action alternative as a proper baseline for assessing the action alternatives against that no-action standard.

None of these costs have been disclosed in any of the NEPA documents to date, nor compared to alternatives in determining the practicability of other approaches.

⁴ Not only will Northern Water's new approach dramatically increase overall project costs and the amount of time before the project is viable due to water rights acquisition, but there will be additional costs and time expended addressing water rights issues associated with this new approach in water court. These costs and delays must also be examined as part of a supplemental NEPA analysis.

⁵ Under this new approach, every purchase/exchange allows Northern Water to displace clean Poudre River water with more contaminated and more polluted water from the South Platte River. The mixing of water from these two sources will very likely adversely impact water quality for all ditch customers, including landowners who have *not* sold or leased their water rights to Northern Water. The Corps must analyze these water quality impacts, which require landowners who refuse to sell to Northern Water to nevertheless accept more polluted and lesser-quality water from the South Platte that otherwise would flow from the much cleaner Poudre River, and would require this outcome presumably without any compensation for those landowners from Northern Water or the Corps.

Eighth, in conjunction with this new approach, Northern Water expects to exchange 25,000 acre-feet of water between several ditch companies and the NISP participants. However, there is nothing in the Final EIS or elsewhere quantifying the costs of any contracts or other agreements with these ditch companies, nor any evaluation of what happens if the ditch companies are unwilling to partner with Northern Water on this project. This, too, must be addressed through supplemental NEPA analysis.

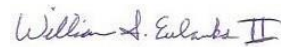
Ninth, supplemental NEPA review is necessary because Northern Water's new approach to the preferred alternative changes the assessment of impacts to the irrigated agriculture-related economy of northern Colorado. Whereas the Final EIS stated that the no-action alternative "would likely result in a moderate to major effect on irrigated agricultural economy in the study" due to widescale purchase of water rights under the no action alternative, Final EIS at 4-541, the Corps stated that "[u]nlike the No Action Alternative, Alternative 2M would not rely on transfers of agricultural water rights as a source of supply"; "[c]onsequently, there would not be effects on the irrigated agriculture-related economy due to water transfers." *Id.* at 4-545. Clearly, the Corps' earlier assumption that the preferred alternative would not involve transfers of agricultural water rights is no longer accurate, nor is the conclusion accurate that the local agricultural economy will not be impacted by implementation of the preferred alternative. This aspect of the Final EIS needs to be revised to account for current information on the preferred alternative and to accurately identify economic and other effects that will reasonably flow from Northern Water's new approach.

Given the many areas of the Final EIS that are now outdated, inaccurate, or flawed, it is imperative that the Corps update its analysis of project impacts, alternatives, and purpose and need. This critically important information requires supplemental NEPA review addressing these concerns both because Northern Water has made "substantial changes in the proposed action that are relevant to environmental concerns," and the new approach constitutes "significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts," 40 C.F.R. § 1502.9(c)(1). Thus, because agencies "shall prepare supplements" to final EISs where either criterion is satisfied, *id.*, the Corps must conduct supplemental NEPA review and issue an SEIS (or at least a supplemental EA) addressing this vitally important issue that is central to the Corps' purpose and need analysis, evaluation of reasonable alternatives that could satisfy the need for this project, and the ultimate decision as to whether the Corps should authorize this project under Section 404 of the Clean Water Act. In conducting supplemental NEPA review, Save The Poudre strongly urges the Corps to subject that document to public comment and input, in light of the controversial nature of this project and the immense public interest in this project shown to date by Colorado residents. In our view, absent a supplemental NEPA analysis incorporating the new elements of the preferred alternative and public comment on that evaluation, the Corps' action would not satisfy NEPA's "hard look" standard and would, instead, be sweeping vital aspects of this project and its effects under the rug,

CONCLUSION

For the reasons explained above, Save The Poudre believes that the Corps must conduct supplemental NEPA review as directed by the CEQ's NEPA regulations to analyze various aspects of Northern Water's new WaterSecure program and how it impacts this project, its purpose and need, its impacts, and feasible alternatives. Please let me know by **no later than March 29, 2019** if the Corps intends to prepare a Supplemental EIS or EA in response to this letter and the significant new information identified herein. If the Corps decides not to conduct any further NEPA review despite the new information set forth in this letter, please provide a written response by March 29 explaining the reasons why the Corps has declined this request. I look forward to hearing from the Corps about this matter. Please let me know if you would like to schedule a conference call to discuss this matter in person.

Respectfully submitted,

A handwritten signature in blue ink that reads "William S. Eubanks II". The signature is written in a cursive style with a stylized "W" and "E".

William S. Eubanks II

Memo to: Larimer County Commissioners

From: Dr. Yvonne M. Wittreich

Date: June 7, 2020

Regarding: No Pipe Dream and placement of Thornton and Northern Pipelines

I am writing an urgent memo to each of you, as we are still very concerned about the location of the Thornton and Northern Pipelines. The residents of Douglas Road, east and west, as well as residents of County Road 56 have been under so much pressure for nearly three years with the threat of cramming pipelines down our roads. Previously, in the past, we were threatened by a Truck Bypass rambling trucks down our roads. When will we have peace, harmony, and tranquility in our neighborhoods, instead of threat and intimidation?

In the meantime, we are pleased for our neighbors on Country Club Road who have enjoyed peace of mind with improvements such as the following:

- Signs restricting semi-trucks to use County Club Road (Unfortunately, now we get the trucks on Douglas Road)
- A new traffic light at the corner of Turn berry and Country Club Road
- A cross walk for residents and children on Country Club Road
- Road work and improvements at the corner of Colorado 1 and Country Club Road

For many years, we have written letters and appealed to you to put a traffic light at the corner of Colorado 1 and Douglas Road. We have described to you so often, how dangerous and treacherous this crossing is. Wellington has doubled in size, and traffic is very heavy on Colorado 1 and Douglas Roads. Increased Semi trucks have made this crossing even more horrific and dangerous!! We are hopeful that the traffic light can still be put in this summer, as we were recently told.

Now, we have a large number of semi-trucks speeding down Douglas Road as if it were a designated Truck Bypass. Could signs be put at the entries of Douglas Road asking the truck drivers to stay on Highway 287, a designated Truck by Pass? Signs such as "Residential Neighborhoods, Larimer County Encourages Truck Drivers to stay on Highway 287, a designated Truck Route", would be helpful. We are a residential neighborhood, too, and now we have many multi ton trucks rambling down our road from early am to late evening. What is a recent count per day of semi-trucks on Douglas Road, has one been completed?

The residents of Thornton and Northern Cities do not deserve your support and allegiance, as they do not care about you or us. Thornton can keep their water in the Poudre River as they originally bought farm water, not the pristine waters of the Poudre River!! Northern is too big of a project for Larimer County and it should be discontinued because of the danger it proposes to the water system as well as destruction in neighborhoods from a huge dam and monstrous water pipes!!

Have you seen the "disarray" on Remington and Parker Streets? This is a signal to all of us what our roads and neighborhoods could soon look like.

I have felt that you were our colleagues and friends as many of us attended your monthly public meetings. I hope that we can continue to feel this way about our elected officials, our commissioners.

Thank you for your time in reading this message, and I hope it will make you think what you are doing to the beautiful, rural northern areas of Larimer County. I write this memo in support of No Pipe Dream, Save the Poudre and Save Rural Northern Colorado neighborhood groups.

“ Most Sincerely,


Dr. Yvonne M. Wittreich

Resident of Douglas Road

Copies: Rob Helmick

Mark Peterson



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

NISP Comment

3 messages

Daniel Teska <dt2885@gmail.com>

Mon, Jun 8, 2020 at 7:59 PM

To: "bocc@larimer.org" <bocc@larimer.org>, "ccsl@fcgov.com" <ccsl@fcgov.com>, "pcboard@larimer.org" <pcboard@larimer.org>

Dear Commisioners Donnelly, Johnson, and Kefalas,

I am writing you today to urge you to oppose NISP. The Cache la Poudre River is the heart and soul of Larimer County and Fort Collins, and allowing NISP to move forward would result in the destruction of the very river that provides irrigation for farmers, recreation, wildlife habitat, and aesthetics and beauty for our community.

You have the opportunity to provide a legacy for our children and grandchildren. If NISP is allowed to be built, the chance for them to enjoy the river as it now exists would disappear. Imagine if the National Park system was not created. We would have lost the public lands that we now enjoy, the incredible beauty of the country that we see every day. Without the Endangered Species Act, we would have lost many of the flora and fauna that are an essential part of a functioning ecosystem, and a chance to enjoy the plants and animals that Would have otherwise been lost. We would have lost our national symbol, the Bald Eagle, as well as many plant and animal species that have been saved because of the ESA.

You have heard the arguments for opposing NISP, but they are worth repeating here. Water from the reservoirs created by NISP would go outside of Larimer County, to Weld and Boulder County towns. It would reduce Poudre River flows to a trickle through Fort Collins and beyond, after the city spent millions building a new whitewater park. There would be massive dam construction impacts for local residents and massive pipeline construction impacts, destroying or damaging many Larimer County and Fort Collins natural areas. It would be necessary for NISP to buy 20,000 acres of farms for their water rights, taking farmland out of production that is needed for our future.

The impact on our rural communities would be huge. The noise, traffic, and air pollution caused by dam construction would negatively impact their way of life. Irreparable harm of the land, air, water and rural character would result from this project.

Pipeline construction impacts would be massive. Private property would need to be seized by eminent domain, road construction and environmental impacts would have a detrimental effects on day to day life. Natural areas would be lost, resulting in degraded ecosystems and recreational opportunities, not to mention the effects on wildlife and habitat.

NISP would result in the degradation of flows and water quality of the Poudre. It would mean the destruction of the river as we know it.

Is that the legacy you want to leave, or do you want to leave a legacy where the Poudre River would be protected and preserved for future generations? There are alternatives to provide water for future residents of Larimer County. But if you allow NISP to go forward, the loss of the river as we know it would be unimaginable.

Thank you for the opportunity to share my thoughts on this important subject. Please oppose NISP. Our children and grandchildren will thank you for the vision to make a very difficult decision.

Sincerely,

Dan and Val Teska
410 Buckeye St.
Fort Collins, CO 80524
970-218-1286

Matthew Lafferty <laffermn@co.larimer.co.us>

Tue, Jun 9, 2020 at 8:18 AM

To: Rob Helmick <helmicrp@larimer.org>

fyi

[Quoted text hidden]

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**Matthew Lafferty, AICP**
Principal Planner

Community Development Department
Advanced Planning
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W: 970.498.7721
mlafferty@larimer.org | www.larimer.org

Linda Hoffmann <hoffmalc@co.larimer.co.us>
To: "Helmick, Rob" <helmicrp@co.larimer.co.us>

Thu, Jun 18, 2020 at 10:49 AM

Please add this to the public record for the application.

**Linda Hoffmann**
County Manager

Commissioners' Office
200 W Oak St, Fort Collins, CO 80521 | 2nd Floor
W: (970) 498-7004
lhoffmann@larimer.org | www.larimer.org

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

From: **Daniel Teska** <dt2885@gmail.com>

Date: Mon, Jun 8, 2020 at 7:59 PM

Subject: NISP Comment

To: bocc@larimer.org <bocc@larimer.org>, ccsl@fcgov.com <ccsl@fcgov.com>, pcboard@larimer.org <pcboard@larimer.org>

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

NISP 1041 is incomplete

2 messages

normanranch <normanranch@earthlink.net>

Mon, Jun 8, 2020 at 10:20 AM

To: boccc@larimer.org, pcboard@larimer.org, rhelmick@larimer.org

Dear Commissioners,

NISP has its 1041 Glade Reservoir and Pipeline application deemed complete by the Planning Department. There are numerous deficiencies and the completeness determination should be reversed.

The issues below need to be addressed more thoroughly by NISP before ever going before the Planning Commissioners.

Here are just a few of the many concerns we have over NISP's 1041 application:

1. The relocation of 7 miles of Highway 287, a major federal highway, would not occur but for the NISP project. NISP is treating the 7 miles of highway 287 relocation as "not our problem" and is claiming the relocation and all of its impacts is a separate "CDOT" project, to be funded by taxpayers! The relocation of 287 started out in the NISP proposal, "NISP includes the following facilities located in Larimer County: **the Glade Unit**; the Glade Pump Station; raw water distribution piping; and the **relocation of U.S. Highway 287.**" NISP then changed its mind and excluded the 287 relocation from the proposal. The relocation will have major impacts to Larimer County and its taxpayers, public safety, visual impacts, historic structures, etc.. The relocation of U.S. Highway 287 is part and parcel of NISP, please insist it is addressed in the 1041.

2. Not adequately addressing 1041 Criteria 6, "The proposal will not negatively impact public health and safety".

a. The proposal will push a missile site carcinogenic chlorinated solvent plume into domestic drinking water wells. As stated by geological expert, Tom Sales, "Historical operations at a DoD Nuclear Missile Site at the base of the Glade Dam created a large plume of carcinogenic chlorinated solvents in groundwater that currently passes out beneath the proposed forebay for Glade. Plumes of this nature last many lifetimes and it is implausible that site specific efforts to clean up the plume have been effective. Northern installed more than 20 monitoring wells in 2019 located through the plume, but no public records are available regarding data from the Northern 2019 monitoring well network." The forebay is a below dam small reservoir of the Poudre water which will be pumping water 375 feet up into Glade Reservoir. This groundwater carcinogenic contamination must be addressed thoroughly in the 1041. Why wasn't the NISP monitoring well information made public? Please insist this information is included in the 1041.

b. The relocation will take a benign straight highway alignment along a valley bottom and turn it into a dangerous road up and over a high hogback. This rocky terrain, and curvy reroute will be a longer and more dangerous road, causing higher accident rates. Blind corners will undoubtedly cause an increase in vehicle/vehicle and vehicle/wildlife accidents. I concur with attorney, John Barth's statement, "The new alignment will increase emergency response times by at least 5 minutes, critical minutes in a life-threatening emergency." This reroute is only for the benefit of NISP, and unnecessarily endangers Larimer County residents and visitors. Please insist these safety issues are addressed in the 1041 application.

c. Two large faults, the North Fork Fault and the Bellvue Fault, pass under the proposed Glade Dam site. Tom Sale, geological expert, states, " 1) the faults represent vertical intervals of broken rock and 2) that they pass directly under the proposed dam site (that will have up to 400 feet of differential water level) it seems highly likely that leakage under the dam along the faults will be severe. NISP's "Oh, by the way" inclusion in the application is, "There are two earthquake faults mapped within the Glade unit. The Bellvue Fault and North Fork Fault have been intercepted at depth by test holes advanced during the project's geotechnical investigations.".... "Both faults are inactive and do not present a seismic risk to the project." **All faults are inactive until they aren't.** NISP's remark of "Do not present a seismic risk to the project" has no reference to a government agency verifying there is no seismic risk. Any seismic risk, no matter how small, is unacceptable when it involves a dam holding back 170,000 acre feet of water!. Please demand a more thorough analysis from a federal authority and insist on a qualified government agency's certification that the two faults will never present a seismic risk to the project. Larimer County citizens lives depend on it!

3. Inadequate Criterion #5, "The proposal will not adversely affect any sites and structures listed on the State or National Registers of Historic Places." The Final EIS states there are 82 eligible or potentially eligible cultural sites present in the disturbed area. Eight of the sites are officially eligible and 74 require additional data and formal evaluation. These are dismissed by NISP as minor to moderate impacts. There are numerous additional sites in the APEs of the 287 reroute that are not even mentioned. The FEIS states mitigation will be decided at a future time. This is unacceptable. Please assure that historical sites are individually addressed, by appropriate historical societies as to impact.

4. Proposal has not addressed Criterion #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." To get the Poudre River water into Glade reservoir will take 80MW of power supplied by huge transmission towers similar to those used at Glen Canyon Dam (see below image). The forebay is the holding reservoir for water from the Poudre River, and from where the Poudre water will be pumped 400 feet up into the Glade Reservoir. "The proposed peak pumping rate in Northern's application to Larimer County, from the forebay, is 1,200 cubic feet per second and will require 81 MW (megawatt) of power. To put 81 MW in context, it is equivalent to the power required by Fort Collins' approximately 62,000 residences and 90% of the reported generation capacity of Glen Canyon Dam," states Tom Sale, civil and environmental engineering expert. We also want answers in the 1041 to Tom Sales questions of:

- How will NISP get the required electrical power to the pumps,
- Where is the approval for an 80 MW power line, and
- What is the visual impact of these enormous power lines?

We would like to add to that list:

- What is the carbon footprint in the production, installation, and maintenance of the transmission towers and power lines, and

- What is the on going carbon footprint from the production the electricity required to run those huge pumps?
- Where is the assessment assuring there are no protected and endangered species along the hogback that would be impacted by the towers and lines?

Below is the 90 MW power source illustration, from Tom Sales' comment letter, showing the transmission towers of 90 MW necessary for the Glen Canyon Dam. NISP has stated it will need 80 MW for the proposed Glade Reservoir. The towers needed will be unsightly in this beautiful valley and may have a huge impact of wildlife and human safety. Where is the assessment documentation that there are no protected and endangered species along the hogback?

 Glen Canyon Electric Power Source

Some things just don't make sense, and Glade Reservoir is one of them.

Thank you,

Roberta and John Norman

719-339-1751

normanranch@earthlink.net

Matthew Lafferty <laffermn@co.larimer.co.us>
To: "Helmick, Rob" <rhelmick@larimer.org>

Thu, Jun 11, 2020 at 8:52 AM

fyi

[Quoted text hidden]

--



Matthew Lafferty, AICP
Principal Planner

Community Development Department
Advanced Planning
200 W Oak Street, Suite 3100
Fort Collins, Co 80521
W: 970.498.7721
mlafferty@larimer.org | www.larimer.org



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

NISP Comments for the Record

2 messages

K Artell <artellme2@gmail.com>

Tue, Jun 9, 2020 at 1:21 PM

To: "pcboard@larimer.org" <pcboard@larimer.org>, jkefalas@larimer.org, Steve Johnson <swjohnson@larimer.org>, "tdonnelly@larimer.org" <tdonnelly@larimer.org>

Hello Larimer County Planning Commission and County Commissioners

Please take care regarding Northern Water's proposed pipelines through Larimer County.

I think Poudre River water should be left in the River through Fort Collins to be picked up by a pipeline east of I-25.

The County Commissioners declined to approve Thornton's pipeline which seems to be a similar route through Larimer County as the NISP Pipeline. Is the NISP Pipeline different?

The second additional Poudre Delivery Pipeline is touted by Northern Water as bringing water directly to the Poudre River and through Fort Collins with water being picked up east of Fort Collins. Please note the route of the Poudre Delivery Pipeline (see attached maps and links below). The Pipeline starts in the Homestead Natural Area in Fort Collins and the Pump Station is in the Kingfisher Natural Area in Fort Collins and takes a route through Kingfisher and River Bend Natural Areas as the pipeline heads southeast past I-25. The route is not "east of Fort Collins" as Northern Water claims on its [NISPTalk](#) page. The route goes through Fort Collins natural areas within City limits and the City's GMA area.

The Poudre Delivery Pipeline route is detrimental to the Natural Areas on which taxpayers have spent \$millions to improve the health of the Poudre River, riparian areas, wildlife and recreation. As you know the health of Larimer County depends in part on the health of the Poudre River. The detriment to the River and Natural Areas includes pipeline construction with accompanying noise and air quality impacts on wildlife and area residents and businesses and includes Northern Water's permanent easement along the pipeline route. How can Northern Water mitigate the damage done to the Poudre River and surrounding area?

How does running a pipeline through Natural Areas and the River's riparian area "provide positive benefits to the river corridor and enhance the aquatic and riparian environment" as Northern Water claims? The proposed pipeline should be changed and ideally the water should run through in the Poudre River to be picked up east of I-25.

City of Fort Collins map of pipeline through Larimer County

<https://www.fcgov.com/nispreview/files/nisp-alignment-gma.pdf?1587655316>

<https://www.fcgov.com/nispreview/files/nisp-pipes-on-nad-properties.pdf?1587410652>

Found here <https://www.fcgov.com/nispreview/>

Thank you for your consideration.

2 attachments

**nisp-alignment-gma.pdf**

1117K

**nisp-pipes-on-nad-properties.pdf**

397K

Matthew Lafferty <laffermn@co.larimer.co.us>

Thu, Jun 11, 2020 at 8:49 AM

To: "Helmick, Rob" <rhelmick@larimer.org>

fyi

[Quoted text hidden]

--

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Principal Planner



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2 attachments

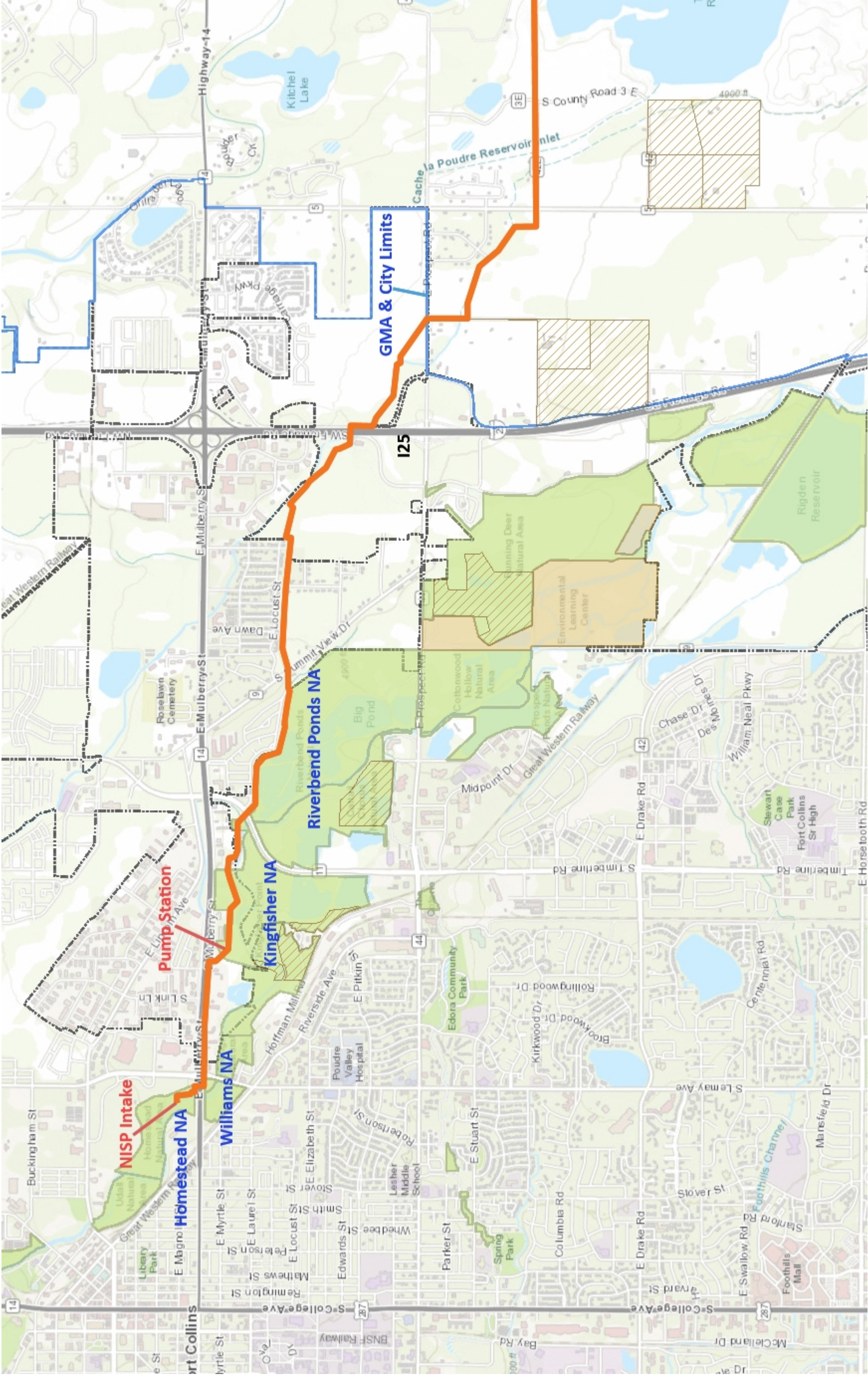


nisp-alignment-gma.pdf
1117K



nisp-pipes-on-nad-properties.pdf
397K

NISP Alignment



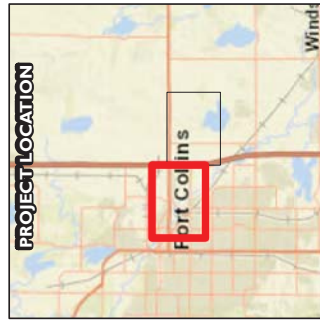
- Legend**
- Conservation Easements
 - Natural Areas
 - Natural Area (City of Fort Collins)
 - State, County or Other Municipal Ownership
 - Meadow Springs Ranch (City of Fort Collins)
 - Growth Management Area
 - City Limits
 - Citations

1:27,437










This map is a user generated static output from the City of Fort Collins FCMaps Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

Notes



Legend

- | | |
|-----------------------------------------------------------------------------------|----------------------------------------------------------|
|  | NISP Conveyance – Poudre Intake
Permanent Impact Area |
|  | NISP Conveyance – Poudre Intake
Temporary Impact Area |
|  | Incorporated Larimer County
and/or Weld County* |
|  | Open Waters |
|  | Wetland |
|  | Major Stream/Ditch |
|  | Minor Stream/Ditch |

Note
NISP = Northern Integrated Supply Project
Wetland and Open Water boundaries have been
exaggerated for visual purposes.

*All non-hatched areas are Unincorporated Larimer County

Wetland Data Source: Pinvon 2019

1 inch = 0.25 miles



Miles

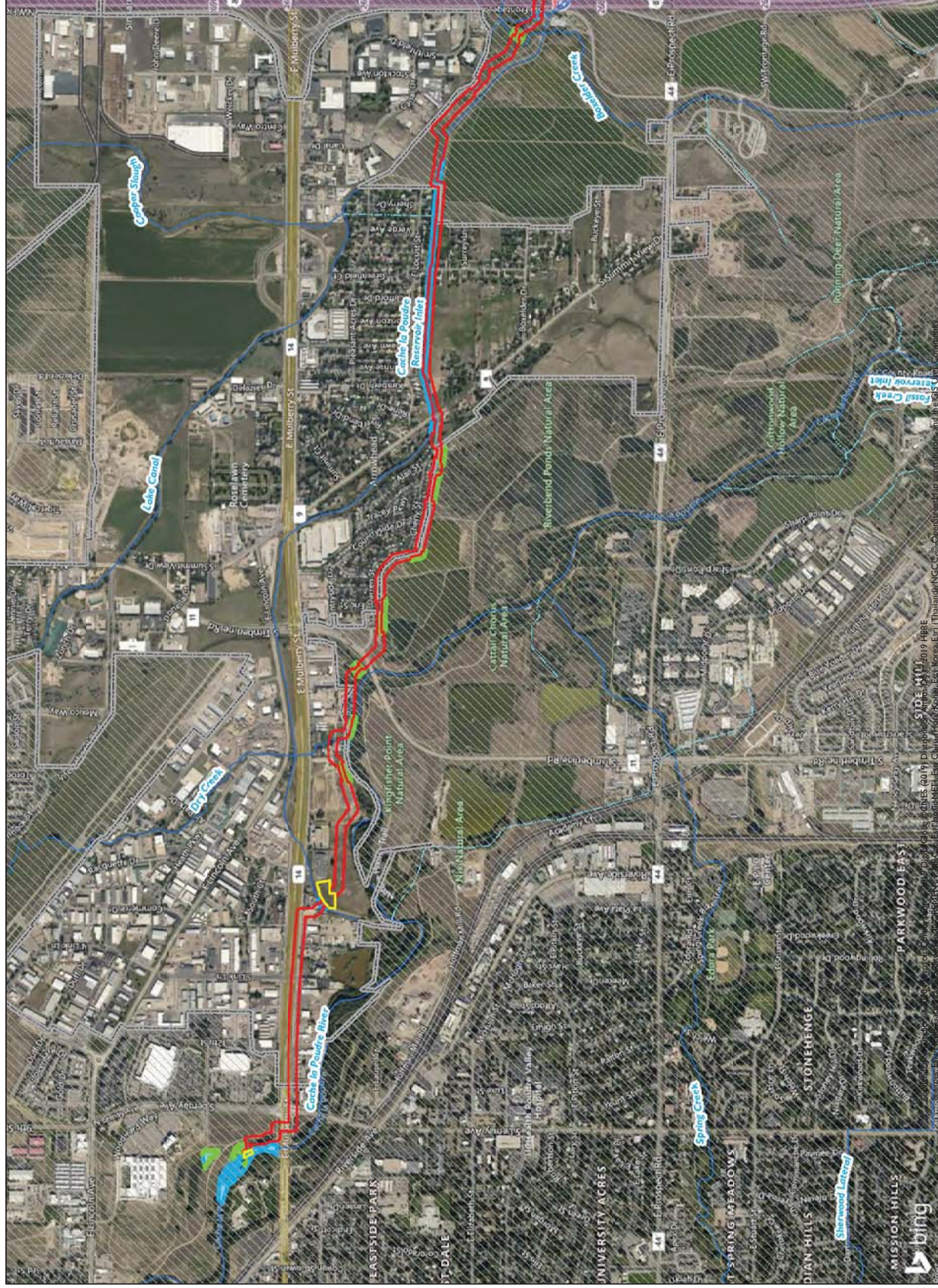


**NISP CONVEYANCE - POWDRE INTAKE
ALIGNMENT WATER RESOURCES**

Northern Integrated Supply Project
 Larimer and Weld Counties, Colorado

Figure 3; Page 2 of 2

Date: 1/23/2020



Site Location: Larimer County, Colorado

Pinyon Project Number: 1881402

Document Path: Z:\PROJECTS\2018\11881402 NISP Environmental Compliance Support\Figures\ArcMap\MXDs\Median del Lamar 1041 Permit\Erosion Control Plan\NISP_Larimer 1041_EC - Poudre MapBook.mxd



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

NISP 1041 permit

3 messages

Roger Hoffmann <rogerh8808@gmail.com>

Tue, Jun 9, 2020 at 2:15 PM

To: pcboard@larimer.org

Cc: bocc@larimer.org

Below, and attached as a PDF, is a letter re. the NISP 1041 review.

~Roger Hoffmann

3908 La Mesa Dr.

Fort Collins, CO 80524

June 9, 2020

Larimer County Planning Commission

Larimer County Board of County Commissioners

To all concerned,

I'm writing as a Larimer County resident, property owner and tax payer, with respect to the Northern Integrated Supply Project (NISP), and its pending 1041 Permit request.

For very many reasons, I believe the Planning Commission must reject the 1041 permit request by the project's proponents, Northern Water. Personally speaking, it is certainly not in my best interests. Nor, I believe, is it in the interest of those whom I suspect to be the vast majority of Larimer County residents. In fact, this project proposal represents significant public harms. I will only mention a few here, in partial explanation for why I oppose it and hope you will deny the 1041 permit.

As you likely know, the Poudre River is already stressed and endangered, in large part by diversions. NISP, if completed, will severely cut off the "peak flows" needed to maintain the river's health and habitats. There is no way to avoid this if this project is built as planned, and it is impossible to mitigate these system-wide impacts. One of the direct ones will likely be a reduction of habitat for trout species. While I'm not an angler myself, I have very many friends who are. Yet, even if there wasn't a single person who personally cared about fishing, we have a moral duty to preserve what we have.

Also with respect to the Poudre itself, I'm extremely concerned about the gradually increasing effects of climate change, whose effects may well be exacerbated by diversions from the river. What is the tipping point? Just how far are we willing to go? While I understand water rights, I would urge the Planning Commission and Board of Commissioners not to play a part in further damaging the river.

NISP's plan is also incompatible with Larimer County's Comprehensive Land Use Plan that pertains to the area in question. Larimer County should defend this plan and its visionary objectives, for the benefit of residents, both today's and tomorrow's; and put Larimer County's interests first.

That Northern Water will buy up farms in Weld County for their water rights is another reason for denial. Why does this matter? For one thing, the drying up of farms in Weld will be yet another heavy blow to agriculture in Northern Colorado, which has already been harmed by speculation in water and land. For another, all that "dry" land will then have only one perceived use- development. This will drive up vehicle miles traveled (VMT), a major contributor to both highway congestion and air quality problems that continue to lower quality of life while driving up costs for all. Several failed attempts to win public support for highway expansions illustrate the growing difficulty of ignoring this problem.

Unfortunately, the federal EIS missed the latter impacts, erroneously concluding that the project has no need for additional water rights (it will), and therefore, no farms would be purchased in order to fill the reservoir. This error alone casts significant doubt on the reliability of the federal EIS.

Of course, NISP won't just drive land development and sprawl in Weld County. The communities participating in NISP are faced with every-increasing costs to finance it. There will be even greater pressures on each for expansion for revenue development to cover these costs. This is ill-advised in an area already literally choking on the effects of high growth rates. NISP, in effect, creates a vicious cycle of debt-fueled expansion which leads to yet further costs for local governments and their taxpayers. This is madness. It is unsustainable and counters everything we try to do to keep Larimer County a great place to live.

Besides such harms, I'm also concerned about the potential long-term costs to residents here from trying to accommodate NISP. I marvel that this can even be considered without a prior public discussion and hearing on whether Larimer County should agree to the relocation of US287, along with the consequences of that.

Summing this up, this is a very bad deal for Larimer County and its residents. I hope that we, who will bear many (but not all) of the negative consequences will be your primary concern in this regard.

Respectfully,

Roger Hoffmann



Letter_LCPC-NISP1041_20200609..pdf
232K

Linda Hoffmann <hoffmalc@co.larimer.co.us>
To: "Helmick, Rob" <helicrp@co.larimer.co.us>

Tue, Jun 9, 2020 at 4:04 PM

Please include this message in the public record for the application.



Linda Hoffmann
County Manager

Commissioners' Office
200 W Oak St, Fort Collins, CO 80521 | 2nd Floor
W: (970) 498-7004
lhoffmann@larimer.org | www.larimer.org

[Quoted text hidden]



Letter_LCPC-NISP1041_20200609..pdf
232K

Matthew Lafferty <laffermn@co.larimer.co.us>
To: "Helmick, Rob" <rhelmick@larimer.org>

Thu, Jun 11, 2020 at 8:49 AM

fyi

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

From: **Roger Hoffmann** <rogerh8808@gmail.com>
Date: Tue, Jun 9, 2020 at 2:15 PM
Subject: NISP 1041 permit
To: <pcboard@larimer.org>
Cc: <bocc@larimer.org>

[Quoted text hidden]

--



Matthew Lafferty, AICP
Principal Planner

Community Development Department
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200 W Oak Street, Suite 3100
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Fort Collins, CO 80524
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Larimer County Board of County Commissioners

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Summing this up, this is a very bad deal for Larimer County and its residents. I hope that we, who will bear many (but not all) of the negative consequences will be your primary concern in this regard.

Respectfully,
Roger Hoffmann



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

Northern Integrated Supply Project

1 message

Darene Carter -Hiatt (dchiatt@yahoo.com) Sent You a Personal Message

Fri, Jun 12, 2020 at 7:32 AM

<automail@knowwho.com>

To: pcboard@larimer.org

Dear Larimer County Commissioners,

I respectfully request that you deny 1041 permit for the proposed Northern Integrated Supply Project based on solid studies that show it would be destructive to the Poudre River and its ecosystem as it flows through Fort Collins and beyond.

Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. If built, during peak flows, NISP could dry up another 71% of the flow through Fort Collins. Studies show that such a reduction would have dire consequences to fish and other aquatic life, riparian ecosystems, water quality, flow volume, and recreation use.

The NISP is expected to cost at least \$1.2 billion, although those costs will rise because Northern Water has not obtained enough water rights to date to fill the reservoir. Northern Water must buy ?dozens and dozens? of Larimer and Weld County farms to obtain the water rights needed. Of the 15 communities and water districts that hold shares in NISP, many are outside the Poudre's watershed.

The NISP is an extremely expensive project that would cause great destruction; disrupt and displace residents around the proposed reservoir, residents along Highway 287, and residents along the proposed pipeline route; and it isn't needed. There are many conservation actions that would provide all the water proposed to be delivered by Glade, including improved water efficiency by municipal districts, industry, and agriculture; public education and awareness programs; repairs to leaking ditches and pipelines, landscape irrigation improvements, and much more.

The NISP is a controversial project that is of great interest to many people in Larimer County who want full opportunity to comment on the permitting process and to appear at public hearings. Because of the scope and controversy surrounding this proposed project, the Commissioners should wait until the coronavirus pandemic has subsided enough to allow for full in-person public participation.

Sincerely,

Darene Carter -Hiatt
4238 Stoneridge Dr.
FORT COLLINS, CO 80525
dchiatt@yahoo.com
(970) 308-2020

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

Mr. John Urbanic, NISP EIS Project Manager
U.S. Army Corps of Engineers, Omaha District
Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80128
nisp.eis@usace.army.mil

June 16, 2020

Via Email and Regular Mail

Dear Mr. Urbanic:

No Pipe Dream Corporation, Save Rural NoCo, and Save the Poudre collectively submit this letter specifically to express significant concerns regarding the inadequacy Final Environmental Impact Statement (FEIS dated July 2018) for the Northern Integrated Supply Project (NISP) prepared by the U.S. Army Corps of Engineers (Corps).

Within seven months after the publication of the FEIS, the applicant for the NISP announced a substantive change that renders each of the alternatives analyzed in the FEIS out-of-date and inaccurate, especially alternative 2M, the applicant's preferred alternative. Specifically, the applicant announced publicly in February 2019 that it would undertake a farm-buying program in order to acquire the rights to 22,000 acre-feet of water (Loveland Reporter, Northern Water Buys First Farm for NISP Water [Feb. 28, 2019], available at http://www.reporterherald.com/news/larimer-county/ci_32483944/northern-water-buys-first-farm-nisp-supply). For a project that requires about 40,000 acre-feet of water rights, the project currently lacks more than half of the rights it needs. The proponent has embarked on a farm-buying program, and between February 2019 and May 2019, has purchased just 94 acres of farmland in Weld County (Attachment A). The applicant's current proposed action, therefore, is not analyzed in the FEIS.

The FEIS (Table 2-14) estimates that costs for water rights acquisition under the No Action Alternative would be \$700,000,000. Costs for water rights under the preferred alternative 2M is \$0. The applicant has already spent almost \$1,000,000 to purchase the three farms in Weld County, for a total of about 94 acres. At this rate, project costs for water rights acquisition would be at least \$242,000,000 (e.g., 11,000 per acre * 22,000 acres), a cost that is not disclosed as part of any alternative in the FEIS. And, at this rate, water rights acquisition would take over 200 years; therefore, the current project cannot meet the purpose and need described in the FEIS (FEIS pg. 1-5). Even more relevant is, however, that the project is entirely speculative since there are no guarantees that the water rights can ever be obtained.

The FEIS must present a clear and accurate assessment of the proposed costs of the current project. Furthermore, other alternatives may now be less costly. So far, about 94 acres of farmland has cost the project almost \$1,000,000, and no headway has been made in over a year. The feasibility of this project is highly questionable and must be independently, thoroughly reevaluated and its impacts disclosed.

Beginning on page 2-8 of the FEIS, Section 2.2.3.2 describes four scenarios for agriculture-to-municipal transfers and clearly discloses the reasons why the Corps determined that all four failed to meet the purpose and need for the project. Specifically:

In 2007, the Corps considered four scenarios of agricultural to municipal transfer concepts (HDR 2007):

- *Partial supply, preserve agriculture – obtain at least 30% (12,000 AF) of firm yield for NISP and preserve agriculture by leasing water back to agricultural users on a rotating basis*
- *Full supply, preserve agriculture – obtain all 40,000 AF [acre-feet] of firm yield, but preserve agriculture by leasing the water back to agricultural users through a rotating fallow program*
- *Full supply, permanently remove irrigation from agricultural lands*
- *Partial supply, permanently remove irrigation from agricultural lands*

With regards to the first scenario, the Corps determined the following:

As a result, the rotational fallowing concept has not progressed to the point of being considered a proven technology (Hydros 2012). Therefore, scenarios involving rotational fallowing would fail the NISP proven technology and firm yield screening criteria, if irrigators retained ownership of the water rights.

With regards to the second scenario, the Corp determined:

The full supply, preserve agriculture scenario would fail to meet the NISP firm yield for the same reasons as the partial supply, preserve agriculture scenario discussed above. The amount of agricultural water required to produce 40,000 AF of firm yield for NISP while running a successful rotating fallow program to keep agricultural land in production would be far in excess of the 103,000 AF required for the partial supply option (HDR 2007). It also would be nearly impossible to guarantee that enough water could be purchased to satisfy the full firm yield demand through this full supply, preserve agriculture scenario.

Similarly, the Corps dismissed one of two options for third scenario:

For the full supply, permanently remove irrigation from agricultural lands scenario, there would be two options. The first option would be to purchase C-BT units from ditch companies..... Because the objective of the first option is to produce the full 40,000 AF firm yield for NISP, the scenario failed to meet the NISP purpose and need.

The second option for the third scenario was retained and analyzed at Alternative 4, in the DEIS, but was eliminated and replaced with a different Alternative 4 in the FEIS.

The second option is the extensive transfer of agricultural water rights. It is estimated that about 12,000 AF of new firm yield required for NISP could be obtained. This is the partial supply, permanently remove irrigation from agricultural lands scenario, and was evaluated as Alternative 4 in the DEIS. The basis for eliminating Alternative 4 and the concept of the full supply, permanently remove irrigation from agricultural lands scenario is discussed in Section 2.3.1.1.3.

While this analysis explains that agriculture-to-municipal transfers must be dismissed or relegated to the No Action Alternative because they don't meet the project purpose and need, or are not otherwise feasible, they are currently a *large* part of the applicant's plan. Although they were previously rejected as "unproven", they are apparently now proven-enough for the applicant. Alternatives involving water transfers must now be considered feasible and worthy of analysis.

Throughout the FEIS, the current proposed action, including its agriculture-to-municipal transfers must be described in detail, and the impacts of the loss of over 20,000 acres of farmland must be analyzed before the Corps can prepare a Record of Decision for this project. Clearly, the loss of farmland would not be the only impact associated with this substantive change to the proposed action, and the associated direct, indirect, and cumulative effects must also be evaluated. Mitigation must be developed.

On March 12, 2019, Save the Poudre requested the Corps to prepare a Supplemental EIS or EA. It stated, as we have herein, that significant new information bearing on the proposed action had come to light and requested a response, and we hereby incorporate that letter as Attachment B. To our knowledge, the Corps has not taken any action to prepare a supplemental EIS, despite having been aware of it for over a year. It is contrary to NEPA that the Corps has not evaluated this substantive new information. This project would have significant and far-reaching environmental impacts, on the land, water, and communities across northern Colorado and on the Poudre River, which is a regional treasure. In the absence of a supplemental NEPA document, the Corps must deny the Section 404 permit since the effects of the current project are undisclosed and the NEPA requirements have not been met.

No Pipe Dream Corporation is a Colorado non-profit corporation composed of Larimer County property owners and taxpayers established to protect citizens from the intense adverse impacts of multiple proposed pipeline and reservoir projects in Larimer County, including but not limited to NISP. Save Rural NoCo is a Colorado non-profit organization composed of property owners and taxpayers whose mission is to protect existing land, water, and communities in rural northern Colorado from harmful development through research and public education. Save the Poudre is a Colorado non-profit membership organization primarily composed of residents of Larimer County, including outdoor recreationists, scientists, property owners, and taxpayers that would be adversely impacted by the construction and operation of NISP. Save the Poudre's members live, work, and recreate on and around the Cache la Poudre River in Larimer County. Some members own property or have residences near the Poudre River in the City of Fort Collins.

Sincerely,


s/ Robert Kitchell, President
No Pipe Dream Corporation

s/John Dettenwanger, Chairman
Save Rural NoCo Corporation

s/ Gary Wockner
Save the Poudre

Xc: Rob Helmick, rhelmick@larimer.org
Larimer County Planning Commission, pcboard@larimer.org
Larimer County Board of County Commissioners, bocc@larimer.org

Attachment A

**Weld County**
PROPERTY PORTAL

Property Information (970) 400-3650
Technical Support (970) 400-4357

Map SearchReset?

northern integrated suppSearch

Name Search: 3 record(s)

Page 1 of 1
1 - 3 of 3

10 per page ▾

Include Oil and Gas

« < 1 > »

Account	Parcel	Owner	Location	Subdivision
R8955327	080103300007	NORTHERN INTEGRATED SUPPLY PROJECT WATER ACTIVITY ENTERPRISE		
R3796705	080129100063	NORTHERN INTEGRATED SUPPLY PROJECT WATER ACTIVITY ENTERPRISE		
R8940420	080129100066	NORTHERN INTEGRATED SUPPLY PROJECT WATER ACTIVITY ENTERPRISE	25556 CR 66, WELD	

« < 1 > »

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[Privacy Policy & Disclaimer](#) | [Accessibility Information](#)

Attachment A. Screen Shot of Weld County Assessors webpage showing that Northern Integrated Supply Project Water Activity Enterprise has purchased three properties.

Attachment B

Meyer Glitzenstein & Eubanks LLP Letter Dated March 12, 2019 (see attached pdf file).



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

Fwd: Northern Integrated Supply Project

1 message

Linda Hoffmann <hoffmalc@co.larimer.co.us>
To: "Helmick, Rob" <helmicrp@co.larimer.co.us>

Sun, Jun 14, 2020 at 11:07 AM

Please include this message in the public record for the application.

**Linda Hoffmann**
County Manager

Commissioners' Office
200 W Oak St, Fort Collins, CO 80521 | 2nd Floor
W: (970) 498-7004
lhoffmann@larimer.org | www.larimer.org

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

From: **Jan Kleckler** (jkleckler@q.com) Sent You a Personal Message <automail@knowwho.com>
Date: Sun, Jun 14, 2020 at 6:47 AM
Subject: Northern Integrated Supply Project
To: <bocc@larimer.org>

Dear Larimer County Commissioners,

I respectfully request that you deny 1041 permit for the proposed Northern Integrated Supply Project based on solid studies that show it would be destructive to the Poudre River and its ecosystem as it flows through Fort Collins and beyond.

Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. If built, during peak flows, NISP could dry up another 71% of the flow through Fort Collins. Studies show that such a reduction would have dire consequences to fish and other aquatic life, riparian ecosystems, water quality, flow volume, and recreation use.

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Sincerely,

Jan Kleckler
[309 W. 10th St.](http://309.W.10th.St)
Loveland, CO 80537
jkleckler@q.com
(970) 669-0819

6/15/2020

co.larimer.co.us Mail - Fwd: Northern Integrated Supply Project

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



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

Northern Integrated Supply Project

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Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. If built, during peak flows, NISP could dry up another 71% of the flow through Fort Collins. Studies show that such a reduction would have dire consequences to fish and other aquatic life, riparian ecosystems, water quality, flow volume, and recreation use.

The NISP is expected to cost at least \$1.2 billion, although those costs will rise because Northern Water has not obtained enough water rights to date to fill the reservoir. Northern Water must buy ?dozens and dozens? of Larimer and Weld County farms to obtain the water rights needed. Of the 15 communities and water districts that hold shares in NISP, many are outside the Poudre's watershed.

The NISP is an extremely expensive project that would cause great destruction; disrupt and displace residents around the proposed reservoir, residents along Highway 287, and residents along the proposed pipeline route; and it isn't needed. There are many conservation actions that would provide all the water proposed to be delivered by Glade, including improved water efficiency by municipal districts, industry, and agriculture; public education and awareness programs; repairs to leaking ditches and pipelines, landscape irrigation improvements, and much more.

The NISP is a controversial project that is of great interest to many people in Larimer County who want full opportunity to comment on the permitting process and to appear at public hearings. Because of the scope and controversy surrounding this proposed project, the Commissioners should wait until the coronavirus pandemic has subsided enough to allow for full in-person public participation.

Sincerely,

Jan Kleckler
309 W. 10th St.
Loveland, CO 80537
jkleckler@q.com
(970) 669-0819

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

Laura Wynkoop (wolfie712@aol.com) Sent You a Personal Message
<automail@knowwho.com>
To: pcboard@larimer.org

Sun, Jun 14, 2020 at 11:45 AM

Dear Larimer County Commissioners,

I respectfully request that you deny 1041 permit for the proposed Northern Integrated Supply Project based on solid studies that show it would be destructive to the Poudre River and its ecosystem as it flows through Fort Collins and beyond.

Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. If built, during peak flows, NISP could dry up another 71% of the flow through Fort Collins. Studies show that such a reduction would have dire consequences to fish and other aquatic life, riparian ecosystems, water quality, flow volume, and recreation use.

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Sincerely,

Laura Wynkoop
4585 Levi Ct.
Loveland, CO 80537
wolfie712@aol.com
(970) 776-8276

[Quoted text hidden]



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

Multiple groups' significant concerns about NISP FEIS

2 messages

Karyn Coppinger <kcoppinger31@gmail.com>

Tue, Jun 16, 2020 at 2:58 PM

To: nisp.eis@usace.army.mil, rhelmick@larimer.org, pcboard@larimer.org, bocc@larimer.org

Dear Mr. Urbanic:

Attached please find a letter from Save Rural NoCo, No Pipe Dream, and Save the Poudre expressing significant concerns about the NISP FEIS requiring Corps action.

Thank you for your consideration,
Karyn Coppinger
Save Rural NoCo

2 attachments

**Corps of Engineers Letter 6_16_20.pdf**
328K**Formal Request for Supplemental NEPA Review 3.12.19.pdf**
207K

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

Wed, Jun 17, 2020 at 10:51 AM

To: Carl Brouwer <cbrouwer@northernwater.org>, Stephanie Cecil <scecil@northernwater.org>, Christie Coleman <ccoleman@northernwater.org>, Brad Wind <bwind@ncwcd.org>, "Haag, Jeannine" <haagjs@co.larimer.co.us>, "Ressue, William" <ressuewg@co.larimer.co.us>, Frank Haug <haugfn@co.larimer.co.us>, Lesli Ellis <ellislk@larimer.org>, Laurie Kadrach <kadriclm@co.larimer.co.us>, Daylan Figgs <figgsdw@co.larimer.co.us>, Mark Peterson <mpeterson@larimer.org>

[Quoted text hidden]

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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>

2 attachments

**Corps of Engineers Letter 6_16_20.pdf**
328K**Formal Request for Supplemental NEPA Review 3.12.19.pdf**
207K



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

Northern Integrated Supply Project 1041

2 messages

Michael Lindsay <mlindsay767@gmail.com>
To: rhelmick@larimer.org

Fri, Jun 19, 2020 at 8:57 AM

Rob,

I realize I am sending this comment later than requested but I would like to make you aware of my concern about the noise this project will generate. I live in the city limits of Windsor and in Larimer county next to Weld county Rd 13. My property is impacted by construction traffic noise on a daily basis. Currently the noise almost exclusively is generated by construction truck traffic from 6:00am until 6:00 daily. This truck traffic noise for the most part is caused by large diesel engine trucks hauling construction materials that have no or inadequate muffled exhaust systems. Many of these trucks fail to comply with the traffic signage that requires engine brake mufflers. I have no problem with the water pipeline itself but I am really concerned about noise levels that this project will generate with truck traffic not only while construction is taking place next to my property but as the project continues to the south.

I would ask that Larimer county and the project manager provide monitoring and strict compliance of all contractors with the noise level restrictions as described in the project description Pipeline Noise Analysis. Also, please insure compliance with the Colorado state traffic signage CR 42.4.225 that requires the use of engine brake mufflers for trucks.

Respectfully,
Mike Lindsay
[1185 Ridge West Dr.](#)
[Windsor, Colorado 80550](#)
[PH# 970 978 6594](#)

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

Fri, Jun 19, 2020 at 8:58 AM

To: Don Threewitt <threewdl@co.larimer.co.us>, Lesli Ellis <ellisk@larimer.org>, Katie Beilby <beilbykm@co.larimer.co.us>, Steven Rothwell <rothwesc@co.larimer.co.us>, Lea Schneider <schneils@co.larimer.co.us>

[Quoted text hidden]

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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>

WEAVER CATTLE CO., INC.

260 Boattail Drive
Fort Collins, CO 80524
Cell: 970-222-2161

June 22, 2020

Rob Helmick
Larimer County Planner
P.O. Box 1190
Fort Collins, CO 80522-1190

RE: Northern Integrated Supply Project (NISP) 1041

Dear Mr. Helmick,

Weaver Cattle Co., Inc. owns the property where NISP project Highway 287 realignment diverts from Highway 287 south of Owl Canyon. When the current highway was built, our predecessor in interest, the Ripple family, reserved a highway access at what is now 11700 North Highway 287. The Ripple family reserved this access when they granted the easement to the State of Colorado's predecessor in interest, Larimer County. While my family has ranched in Larimer County since 1886, we purchased the Ripple Ranch at Owl Canyon in 1969.

This access has been our main ranch access off of Highway 287 and on the west side of the mountain on our property. We access at this location to check the well that is the only water source in that pasture and is our only water source on the west side of the mountain south of County Road 72. We access at this location to check our cattle, pastures, salt, mineral, perform weed control and other issues related to our ranching operation. We also access our property at this location to get to our property on top of the mountain, again to perform our normal and usual ranching operation activities. At this time, this is our only access to the top of the mountain as we can not access with a vehicle from the east side of the mountain. As you can see, this access is important and vital to our ranching operation.

We have been supportive of the Northern Integrated Supply Project (NISP) and have been working with Northern Colorado Water Conservancy District (Northern) for many years. We have had numerous discussions but we have not started final discussions on the Highway 287 realignment right-of way that will be necessary for the NISP. Throughout these discussions, we have been clear the importance of this reserved access and that we will need a like access with the new alignment. The last time I met with Northern a couple of months ago, this access was not included on the current plans. I have been told the engineers are looking at it – but I have not seen anything in writing. I did note to Northern and their engineers, they are allowing an access almost across the road for the frontage road called Big Ridge Way. I told Northern, that it would make sense to put my access

Rob Helmick
June 22, 2020
Page 2

across the road from the access for Big Ridge Way. While this would not be on the exact location as our reserved access, it would be close and would make sense for highway access control.

We believe this NISP will be very beneficial to agriculture and Larimer County and have been supportive of the project. However, to date, while Northern has been cooperative in other areas, they have not been willing to honor our reserved access. I am asking Larimer County to require Northern to honor this reserved access in the Highway 287 realignment in order for us to maintain our ranching operation. It would seem to be defeating the purpose of the reservoir to protect agriculture, if in the process we put agriculture producers out of business.

Thank you for the opportunity to present this issue to Larimer County. I will not be able to make the June 24, 2020 meeting, but I will plan on attending the July 8, 2020 meeting.

Sincerely yours,



Maxine Weaver, President
Weaver Cattle Co., Inc.

CC: Carl Brouwer, Northern Integrated Supply Project

BEEF – IT'S WHAT'S FOR DINNER!!!

Charlotte Parman

A few questions from a resident, transcribed by Katie Beilby.

How much of the Poudre River flow will be diminished, how will it be affected or decreased by siphoning that water off? How big is the pipeline? Will there be clean up of the river and the ponds that will be decreased after this pipeline is put in?

Does the residents have any say about this, does our opinion really matter? Why does it have to be so close to the residents?

Our property taxes just went up, does this have anything to do with this project?



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

Northern Integrated Supply Project

1 message

Sarah rahm (pinkookami@gmail.com) Sent You a Personal Message

Sun, Jun 21, 2020 at 4:42 AM

<automail@knowwho.com>

To: pcboard@larimer.org

Dear Larimer County Commissioners,

I respectfully request that you deny 1041 permit for the proposed Northern Integrated Supply Project based on solid studies that show it would be destructive to the Poudre River and its ecosystem as it flows through Fort Collins and beyond.

Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. If built, during peak flows, NISP could dry up another 71% of the flow through Fort Collins. Studies show that such a reduction would have dire consequences to fish and other aquatic life, riparian ecosystems, water quality, flow volume, and recreation use.

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The NISP is an extremely expensive project that would cause great destruction; disrupt and displace residents around the proposed reservoir, residents along Highway 287, and residents along the proposed pipeline route; and it isn't needed. There are many conservation actions that would provide all the water proposed to be delivered by Glade, including improved water efficiency by municipal districts, industry, and agriculture; public education and awareness programs; repairs to leaking ditches and pipelines, landscape irrigation improvements, and much more.

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Sincerely,

Sarah rahm
610 Darlene Ct
Grand Junction, CO 81504
pinkookami@gmail.com
(720) 692-0407

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



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

Weaver Access for New 287

1 message

Maxine Weaver <maxine.weaver@yahoo.com>

Mon, Jun 22, 2020 at 7:17 PM

Reply-To: maxine.weaver@yahoo.com

To: rhelmick@larimer.org

Cc: cbrouwer@northernwater.org

Rob,

Attached is my letter for your records on the NISP. I will not be able to attend the meeting Wednesday night as my mom is in the hospital. I will plan on attending the July 8 meeting.

If you have any questions, feel free to contact me.

Thank you,
Maxine

**Letter - Helmick - NISP - 6-22-2020.pdf**
1389K



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

Fwd: NISP

1 message

Linda Hoffmann <hoffmalc@co.larimer.co.us>
To: "Helmick, Rob" <helmicrp@co.larimer.co.us>

Tue, Jun 23, 2020 at 9:12 PM

Please add this message to the public record for the application.



Linda Hoffmann
County Manager

Commissioners' Office
200 W Oak St, Fort Collins, CO 80521 | 2nd Floor
W: (970) 498-7004
lhoffmann@larimer.org | www.larimer.org

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

From: **Megan Thorburn** <meganthor@yahoo.com>

Date: Tue, Jun 23, 2020 at 6:47 PM

Subject: NISP

To: bocc@larimer.org <bocc@larimer.org>

Cc: Sierra Club Poudre Canyon Group Excom List <rmc-pcg-excom@lists.sierraclub.org>, Sierra Club PCG Core <rmc-pcg-core@lists.sierraclub.org>, Carol Jones <cjones@cowisp.net>, Doug Henderson <dhender@gmail.com>, Will Walters <will@walters-consulting.com>, Ted Manahan <ted_manahan@hotmail.com>, Katie Repsis <repskati@isu.edu>, Dr Cory Carroll MD <cdc@drcorycarroll.com>

Attention Board of County Commissioners,

Please see attached letter regarding NISP in preparation for your discussion tomorrow.

Thank you,
Megan Thorburn
Acting Chair
Sierra Club, Poudre Canyon Group



Comments to Commissioners on NISP from PCG Sierra Club.docx

47K



June 23, 2020

Larimer County Commissioners:

The Poudre Canyon Group (PCG) of the Sierra Club respectfully asks the Larimer County Commissioners to deny the 1041 permit for the proposed Northern Colorado Integrated Supply Project (NISP) based on scientific studies that show serious degradation to the Poudre River will occur if it is built, lack of adequate mitigation measures to address problems, and strong citizen opposition to the project.

Currently, almost 60% of the Poudre's water is diverted for agricultural, municipal, and industrial uses. Further diversion will cause major negative impacts to the river's ecology and function, damage the river's utility and use by tens of thousands of people and downstream communities, and harm the area's economy which depends on the river's health and continuing flows.

The State of the Poudre River 2017 study conducted by the City of Fort Collins, found that existing dam and diversion structures "cause unnatural fluctuations in flow volume, which likely affects critical habitat and the reproductive needs of fish and insects in the river." The report also states that "populations of native fish are in sharp decline...most likely due to fragmented habitat and extended periods of extremely low base flows. Other stresses likely influencing fishery health includes rapid fluctuation of flows...and altered water temperatures." If the Halligan and Seaman Reservoirs are expanded, even more water will be diverted from the Poudre, increasing flow and fluctuation disruptions. The massive amounts of water required for NISP can only increase the negative impacts.

Adding to the uncertainty of flows and fluctuations are the anticipated changes to the river due to climate change. The Final Environmental Impact Statement for NISP found extensive negative impacts to the river based on climate change predictions, including to the hydrology, temperature increases that adversely affect fish and other species, flows, changes in runoff timing that greatly affects agriculture, recreational uses, and much more.

Three groups—Save the Poudre, No Pipe Dream, and Save Rural NoCo—have clearly demonstrated the many issues that have been downplayed or ignored in the NISP application, and that are required by Larimer County's land use regulations. The issues include a broad range of serious violations of regulations, including the evaluation of:

- the lack of a permit for the "realignment" of Highway 287,
- the lack of water rights to operate the project,
- inconsistency with the County Master Plan,
- the complete lack of an alternatives analysis,
- the impact on public health and safety,
- the inability of the County to fund the project,

- the impact on the Cache la Poudre River of draining vast amounts of its water,
- the project relies on a huge farm-buying scheme that the Army Corps said was not feasible and too expensive,
- noise caused by power boats and recreation at the proposed Glade Reservoir; and
- the lack of mitigation.

These issues must be fully investigated and results considered in the application process *prior to approval of the 1041 permit*. Approval of the 1041 application while lacking adequate analysis and without meeting associated regulatory requirements would pose a significant vulnerability to litigation, with potential for substantial cost to County taxpayers.

It is ironic that the proposed pipeline route for NISP would follow closely or exactly the same route that was proposed for the Thornton pipeline. The County Commissioners have not forgotten that they unanimously denied the Thornton pipeline route last year. It does not follow that the same affected Larimer County residents would favor a NISP pipeline along the same route—and it would be quite contradictory for the Commissioners to approve it.

NISP is expected to cost at least \$1.2 billion, although those costs will rise because Northern Water has not obtained enough water rights to date to fill the proposed Glade Reservoir. Northern Water plans to buy “dozens and dozens” of Larimer and Weld County farms and obtain exchange agreements with water users to obtain the 22,000 acre-feet needed to supply NISP—which is about one-half the water required for Glade Reservoir. According to an April 2020 article in the Coloradoan, Northern Water only purchased its first farm under their new scenario in February—to the cost of \$330,000, which netted Northern Water 30 acre-feet.

Of the 15 communities and water districts that hold shares in NISP, most are outside the Poudre’s watershed, giving them little stake in the overall health of the river. In fact, Larimer County residents will be left with a degraded river and with little to no benefit from the project.

In addition to its importance to agriculture, municipal, and industrial use, the Poudre is an important recreation source. Not only do boaters, anglers, picnickers, and hikers enjoy the upper stretches of the river, they also treasure its opportunity and beauty as it winds through Fort Collins and beyond. If NISP is permitted, the predicted drops in flows and fluctuations will negatively impact the riparian habitat, the fishery, and the aesthetics of the river as it flows through Fort Collins and beyond. The newly finished White Water Park near downtown Fort Collins is already so popular that it is hard to find parking near the access points. If NISP is allowed, the park may need to change its name to the “Puddle Park.” Although NISP would bring a new reservoir that would attract similar recreation attention as Horsetooth Reservoir, flatwater recreation is not a substitute for the loss of river recreation options and negative riparian health impacts in the Poudre River corridor. In addition, NISP is strongly opposed by many of the people who would be displaced by the new Hwy. 287 road alignment and by the reservoir itself.

Earlier this month (June 2020), the City of Fort Collins’ Land Conservation and Stewardship Board urged the Fort Collins City Council to strongly oppose NISP for myriad of reasons, including those discussed above. Their letter made worthy arguments: “Fort Collins taxpayers have invested tens of millions of dollars to conserve unmatched ecological resources running through the heart of the City. There are 18 Natural Areas that either border on the Poudre River or are connected to it by riverside forests and wetlands; they encompass 1800 acres...Riverside forests and wetlands do not drink primarily from rainfall; they drink from the river. NISP’s removal of water from the river will, quite simply, dehydrate our Natural Areas’ ecological resources and degrade them; hundred-year-old trees will die, understory

plants will shift to more drought tolerant species, biodiversity will decrease, and forest- and wetland-dependent animals will disappear.

“The citizens of Fort Collins, as they have invested in Natural Areas, have believed that those areas and their ecological resources and recreational opportunities would be protected in perpetuity. In the opinion of this Board, perpetuity ends on the day that NISP bulldozers arrive to divert water from the Poudre River.

“NISP brings no benefits to the City of Fort Collins, and City Staff previously identified dozens of risks to the physical river, its biota, and its surrounding ecosystems. We have watched, over many years, as Northern Water has proposed mitigations and how these mitigations have then required further mitigations. Continuing this pattern, the recent 1041 application to Larimer County proposes heretofore unseen details for which Staff and this Board have identified numerous unaddressed mitigation requirements. By now it is clear that the cascade of mitigations is unending. The impacts of NISP on the river and adjacent Natural Areas cannot be mitigated. Our Natural Area assets, assembled with decades of effort and tens of millions of dollars investment, will, under NISP, suffer devastating permanent harm.”

There are alternatives to NISP. Although some of the efforts to lower water consumption have been addressed or considered, much more could, and should be, done. Save the Poudre provides a plan forward that includes:

- Tiered water rates that reward conservation with lower costs to customers who conserve.
- Comprehensive public education and awareness programs about quick-payback water conservation measures.
- Rebate/retrofit programs for low-water use landscaping, low-water-use toilets, shower heads, washing machines, and dishwashers.
- Water following contracts between municipal, industrial, and agricultural users, with investments in agricultural water conservation and water use efficiency in return for use of agricultural water.
- Use Growth-Displaced Water Transfers, i.e., transfer water rights from lands developed by growing communities to the communities needing water.
- Landscape irrigation monitoring and improvement programs to reduce water wasted in excessive irrigation.
- Reduce consumptive use on irrigated acreages and improve the efficiency of agricultural return flows to provide transferable water for other uses.
- Use of gray-water systems and interfacing gray-water systems with water recycling systems wherever possible.

Save The Poudre, in partnership with Western Resource Advocates, has developed an alternative to the destructive NISP/Glade Reservoir proposal that would supply the same amount of water for the growing municipalities at a fraction of the cost and environmental damage.

Northern Water has been proposing various projects to siphon the Poudre River since the 1980s. Those projects have not succeeded because they have all been destructive, expensive, unnecessary projects. It is time to put NISP and Glade Reservoir to rest.

We urge the Larimer County Commissioners to deny the 1041 permit.

Sincerely,

Sierra Club Poudre Canyon Group

Applicant Information



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

Fwd: NISP 1041 Conditions

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

Wed, Jun 24, 2020 at 2:03 PM

conditions from northern

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

From: **Stephanie Cecil** <scecil@northernwater.org>
Date: Tue, Jun 23, 2020 at 12:20 PM
Subject: NISP 1041 Conditions
To: Lesli Ellis <ellislk@co.larimer.co.us>
Cc: Christie Coleman <ccoleman@northernwater.org>, Rob Helmick <helmicrp@co.larimer.co.us>

Lesli,

As discussed last week, we do plan on touching on a few conditions with some recommended minor wording changes. This is from our presentation and includes the two conditions:

Condition: Prior to construction, secure written confirmation from all affected irrigation companies that are impacted by this project by reservoir or pipelines.

There is no guarantee that each irrigation company will provide a written response.

Recommended condition: The applicant shall demonstrate that it has contacted all affected irrigation companies.

Condition: Pipeline alignment alterations greater than 50 feet must be evaluated by Larimer County and may be subject to reconsideration by the BOCC. All alignment changes on private property shall include approval of the landowner.

The Larimer County Land Use Code 14.13 has requirements for technical revisions or 1041 amendments that would need to go back in front of the BOCC.

Recommended condition: Alterations greater than 100 feet or that move within 100 feet of an existing structure must be evaluated by Larimer County staff. Alignment changes on private property shall be coordinated with the landowner in addition to staff review.

Thanks!

Stephanie Cecil, P.E., PMP | Water Resources Project Engineer
220 Water Ave | Berthoud, CO 80513
Direct 970-622-2231 | Cell 970-685-0061

Main 800-369-RAIN (7246)
www.northernwater.org | [Find us on Facebook](#)

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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>

MEMORANDUM



Date: June 12, 2020

To: Larimer County Planning Department

From: Randy Parks – Dewberry, Michael Gossett and Madeleine Harris - HDR

Subject: Northern Integrated Supply Project – Construction Approach in Residential Areas
– Revised June 2020

Overview

Due to the proximity of the Northern Tier alignment to Eagle Lake Subdivision, County Road 52 and Bold Venture Way/Grey Rock Drive, the design team developed a preliminary approach to construction access and estimated construction duration so that the impacts to the residents in these areas and the traveling public could be better understood. The alignment was broken into several segments in each area in order to optimize analysis and construction traffic routing.

Construction Phasing

Construction phases throughout the different segments will be overlapping, not additive nor independent of each other. There are three major phases of construction, defined as follows:

Clearing/Site Prep/SWMP- This is a relatively light construction phase. This phase mainly involves preparing the area for installation. This includes removing vegetation/roots that are in the pipeline easement and stockpiling/protecting topsoil. It also includes other site prep work, including setting up signage, assembling equipment, and materials. Finally, this phase includes preparing the site for stormwater management, which could include installation of silt fences, or other best management practices to prevent erosion caused by stormwater drainage. This phase of construction requires small to medium-duty construction vehicles. There may also be larger delivery trucks who occasionally arrive to drop off pipe in preparation for construction.

Pipe Installation- This is the most significant phase of construction and includes digging the trench for the pipeline, laying the pipeline in the trench, welding joints as needed, backfilling the trench and compacting the area as needed. This construction phase will require larger tracked excavators, front-end loaders, dump trucks and stock-piling of materials to complete the work. Speed limits will be set for the delivery and construction vehicles of 10-15 mph to ensure safety of the site.

Restoration and Reclamation- This is also a relatively light construction phase. This phase mainly includes restoring the construction area to conditions prior to construction. This includes re-seeding as needed, and other restoration efforts. It will consist of small agricultural tractors and pick-up trucks. This phase is typically not consecutive like the other phases as the contractor will usually coordinate restoration/reclamation as needed as pipe installation progresses.

MEMORANDUM

Individual Homeowner Impacts

A homeowner whose property is along the construction path will not experience construction on their property for the entire overall construction duration for that area. For example, a homeowner with a 500' stretch of their property abutting the alignment might expect about one week of clearing/site prep/SWMP, about one week of pipeline installation, and about one week of restoration/reclamation. In total, the 500' stretch will likely only see heavy activity for around 3 weeks. This work may be spaced out depending on weather, soil conditions, detailed reclamation plans and appurtenance requirements.

See Figure 1 below for a timeline and intensity of work diagram with photos of each construction phase activity a typical homeowner might experience.

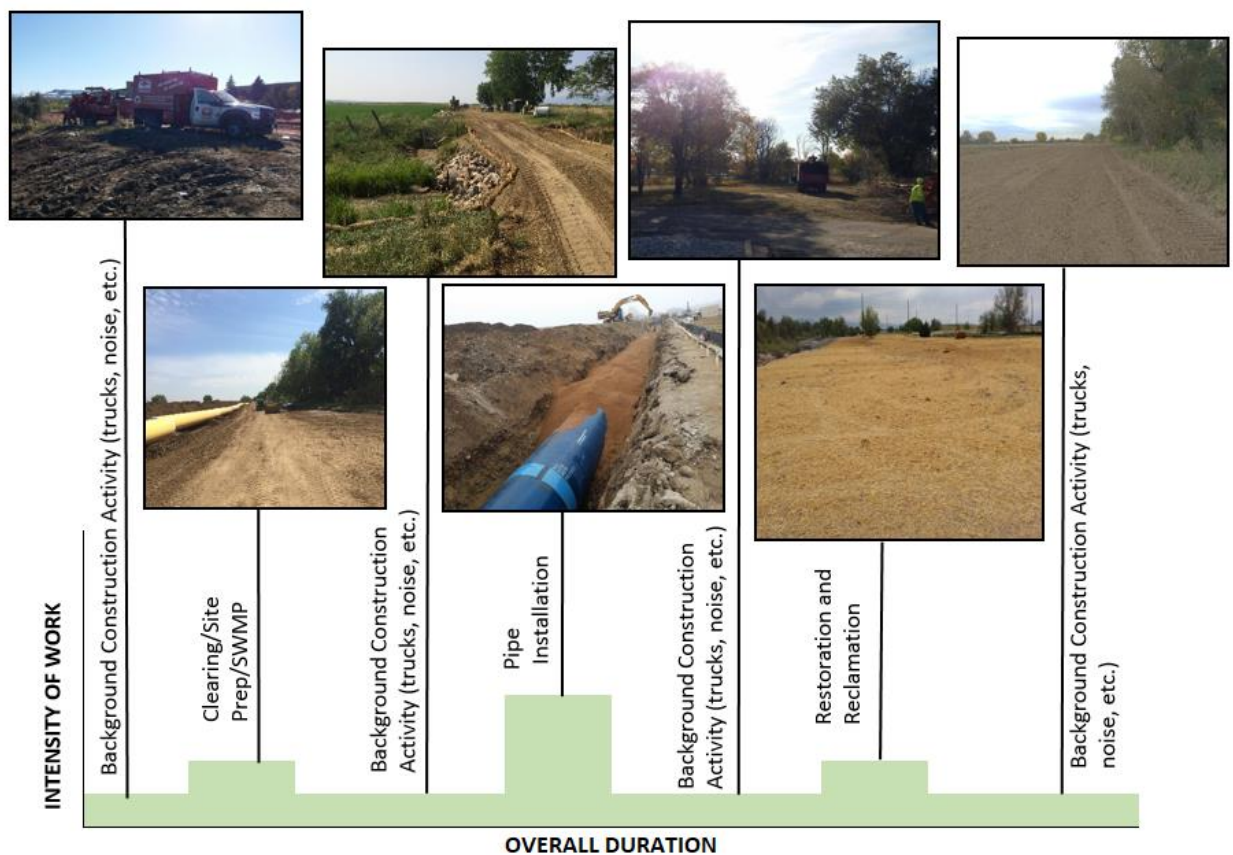


Figure 1: Typical Levels of Activity throughout Construction Duration

Eagle Lake Subdivision

The scope of analysis and segments through Eagle Lake Subdivision are shown in Figure 2 below. The alignment through this area was broken into five segments.

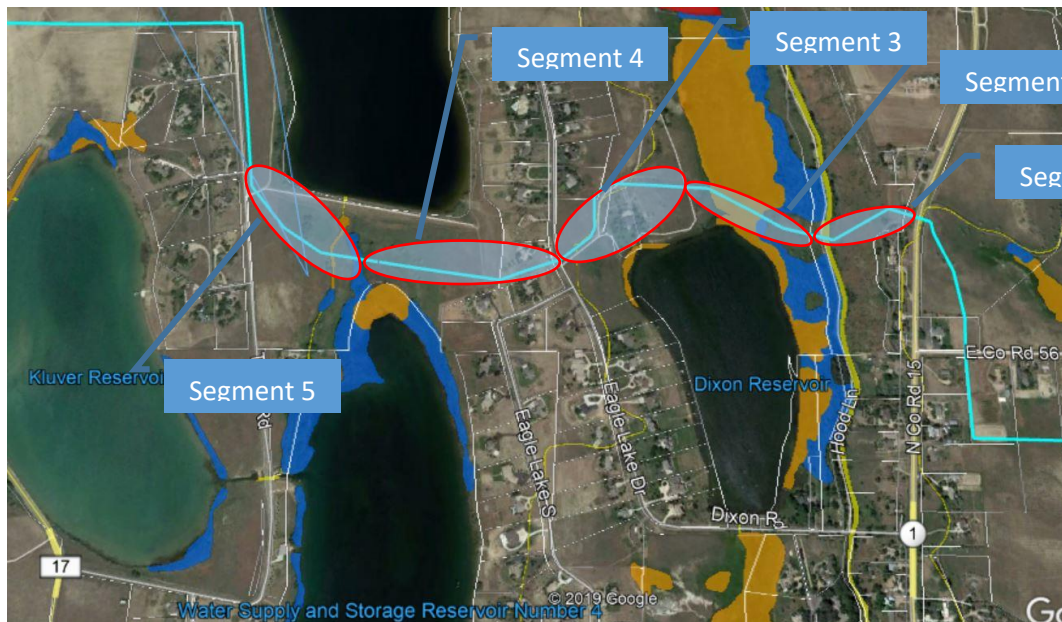


Figure 2: Scope of analysis and segments through Eagle Lake Subdivision

Overall Construction Duration

Construction through the five segments will be overlapping, not additive nor independent of each other. In total, estimated duration of construction through this area is around 14 weeks.

A proposed comprehensive timeline for construction throughout all five segments (approx. 6,000' in total) is displayed in Figure 3. The three major phases of construction are also indicated in the figure.

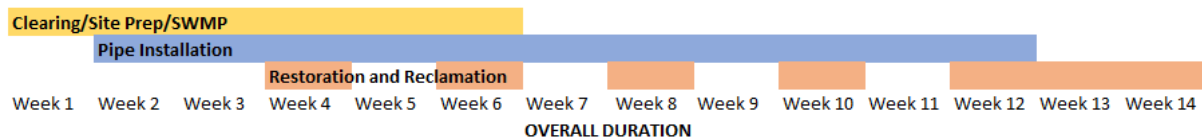


Figure 3: Overlapping construction timeline and phases

As illustrated in Figure 3 above, the estimated durations for each construction phase through the entire Eagle Lake area are as follows:

1. Clearing/Site Prep/SWMP – 6 weeks

MEMORANDUM

2. Pipe Installation for All Segments – 7-11 weeks
3. Restoration and Reclamation – 7 weeks

Construction Duration and Access by Segment

Construction access will be specified by individual segments indicated in Figure 2. Specifying construction access points for each segment will ensure that the least amount of disruption to homeowners and private roadways is maintained. Construction access will be coordinated with individual landowners and the pipeline contractor. Access is subject to change.

Construction activities throughout all segments will occur concurrently to expedite the overall process. Approximate durations of impact provided below for each segment will be overlapping, and should not be summed for a total duration of impact.

Segment 1 – Highway 1 to Hood Lane. Construction and material delivery vehicles will access the alignment via the alignment as it connects to Highway 1. In most cases entering via Highway 1 and exiting via Hood Lane. This segment is approximately 800 feet in length. In total it is anticipated that this area will be impacted for approximately 4 weeks. Since Highway 1 is a paved and highly-trafficked road, construction across Highway 1 will consist of trenchless methods so traffic on that roadway will not be restricted by construction activity. Since Hood Lane is a semi-private gravel road, the pipeline across Hood Lane will be installed with an open cut method. However, homeowner access will be maintained at all times with temporary detours. The road will be returned to current conditions, so only temporary impacts to the roadway are expected.

Segment 2 – Wetlands North of Dixon Reservoir. Construction and material delivery vehicles will access the alignment via the alignment, Hood Lane and Eagle Lake Drive. In most cases entering via Hood Lane and Exiting via Eagle Lake Drive. This will require access to the Eagle Lake Subdivision via the gated entrance at Eagle Lake Drive and Highway 1. This segment is approximately 1,100 feet in length. In total it is anticipated that this area will be impacted for approximately 4 weeks. Because of the presence of wetlands in this segment, construction traffic will not access the alignment via Hood Lane once construction and restoration of this segment is completed. Unless otherwise requested by the County, it is proposed that the Contractor not be allowed to use Eagle Lake Court for construction access.

Segment 3 – Private Property East of Eagle Lake Drive (TIPS COREY ALLEN/KAREN KRISTIN). Construction and material delivery vehicles will access the alignment via Eagle Lake Drive and will use Eagle Lake Drive to both enter and exit the site. This will require access to the Eagle Lake Subdivision via the gated entrance at Eagle Lake Drive and Highway 1. It is anticipated that sufficient temporary easement will be obtained from TIPS COREY ALLEN/KAREN KRISTIN to allow construction vehicles to turn around at the eastern end of this segment and exit the same way they came in. This segment is approximately 1,500 feet in length. In total it is anticipated that this area will be impacted for approximately 5 weeks. Unless otherwise requested by the County, it is proposed that the Contractor not be allowed to use Eagle Lake Court for construction access. The pipeline across Eagle Lake Drive will be crossed using trenchless methods so residential traffic using Eagle Lake Drive will not be restricted.

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Segment 4 – Private Property west of Eagle Lake Drive to drainage between Water Supply and Storage Reservoirs 3 and 4. Construction and material delivery vehicles will access the alignment via the Eagle Lake Drive both for construction traffic entering and exiting the site. This will require access to the Eagle Lake Subdivision via the gated entrance at Eagle Lake Drive and Highway 1. It is anticipated that sufficient temporary easement will be obtained from the Water Supply and Storage Company to allow construction vehicles to turn around at the eastern end of the wetland that connects the two reservoirs. This segment is approximately 1,500 feet in length. In total it is anticipated that this area will be impacted for approximately 5 weeks. Unless otherwise requested by the County, it is proposed that the Contractor not be allowed to use Eagle Lake Court for construction access. Because of the presence of wetlands in this segment, construction traffic will not access the alignment via Eagle Lake Drive once construction and restoration of this segment is completed.

Segment 5 – Private Property east of Travis Road to drainage between Water Supply and Storage Reservoirs 3 and 4. Construction and material delivery vehicles will access the alignment via Travis Road and will use Travis Road to both enter and exit the site. It is anticipated that sufficient temporary easement will be obtained from the Water Supply and Storage Company to allow construction vehicles to turn around at the western end of the wetland that connects the two reservoirs. This segment is approximately 1,100 feet in length. In total it is anticipated that this area will be impacted for approximately 4 weeks.

County Road 52

The scope of analysis and segments near County Road 52 are shown in Figure 4 on the next page. The alignment through this area was broken into seven segments.

Overall Construction Duration

Construction throughout the seven segments will be overlapping, not additive nor independent of each other. In total, estimated duration of construction through this area is around 20 weeks.

A proposed comprehensive timeline for construction throughout all seven segments (approx. 12,500' in total) is displayed in Figure 5 on the next page. The three major phases of construction are indicated in the figure.

As illustrated in Figure 5 on the following page, the estimated durations for each construction phase through the County Road 52 area are as follows:

1. Clearing/Site Prep/SWMP – 9 weeks
2. Pipe Installation for All Segments – 15-17 weeks
3. Restoration and Reclamation – 10 weeks

MEMORANDUM

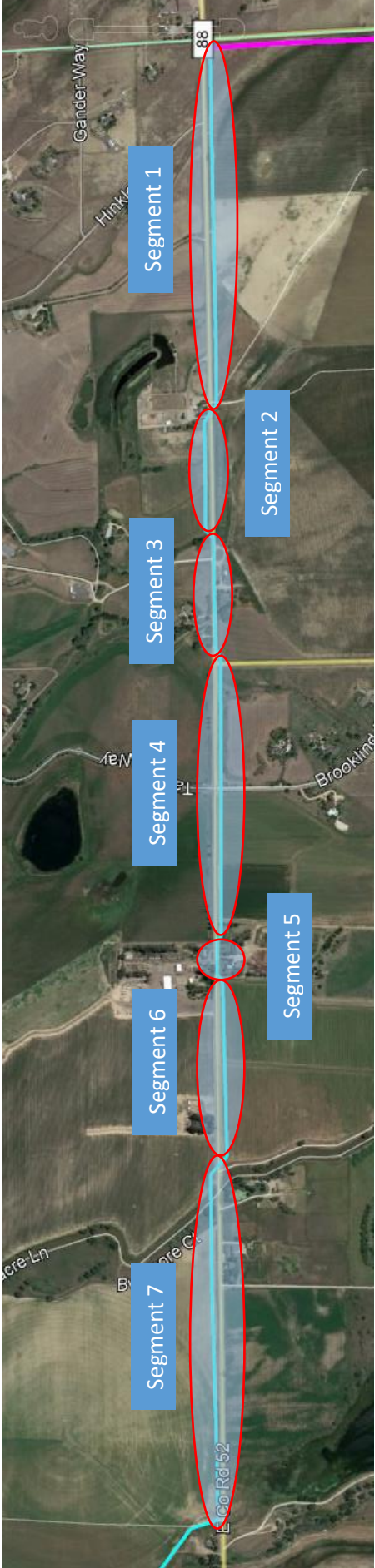


Figure 4: Scope of analysis and segments near CR 52

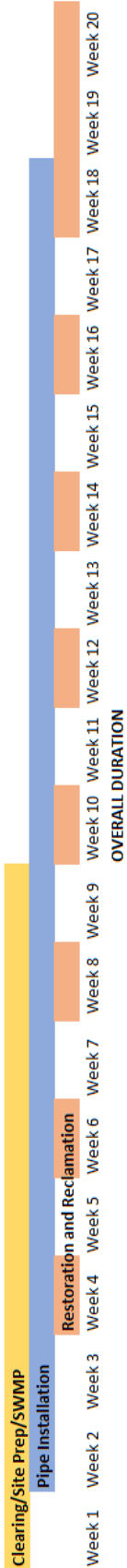


Figure 5: Overlapping construction timeline and phases for entire duration

MEMORANDUM

Construction Duration and Access by Segment

Construction access will be specified by individual segments, as identified in Figure 4. Specifying construction access points for each segment will ensure that the least amount of disruption to homeowners and private roadways is maintained. Construction access will be coordinated with individual landowners and the pipeline contractor. Access is subject to change.

Construction activities throughout all segments will occur concurrently to expedite the overall process. Approximate durations of impact provided below for each segment will be overlapping, and should not be summed for a total duration of impact.

Segment 1 – From intersection with the County Line Pipeline on the west side of County Road 1 to the point where the alignment crosses CR 52 from the south of the road to the north. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along CR 1 from the north, and exit along CR 3 to the south. This segment is approximately 3,100 feet in length. In total, it is anticipated that this area will be impacted for approximately 6 weeks. The alignment is south of CR 52 for the majority of the segment. The pipeline does cross CR 52 from the south side of the road to the north side of the road at the end of the segment. Since CR 52 is a gravel road in this area, the pipeline across County Road 52 will be installed with an open cut method. However, only one lane at a time will be closed and flaggers will be on site so traffic will not be restricted. The road will be restored to current conditions, so only temporary impacts to the roadway are expected.

Segment 2 – From the end of Segment 1, where the pipeline crossed to the north side of CR 52, through to the point where the alignment enters the CR 52 ROW. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along CR 1 from the north, and exit along CR 3 to the south. This segment is approximately 1,000 feet in length. In total, it is anticipated that this area will be impacted for approximately 4 weeks. The alignment is north of CR 52 for the majority of the segment. The pipeline does cross into CR 52 ROW from the north side of the road at the end of the segment. The pipeline is shown in the ROW in this section to avoid impacts to residences in the area and avoid drainage ponds to the south. Since CR 52 is a gravel road in this area, the pipeline within County Road 52 will be installed with an open cut method. However, homeowner access will be maintained at all times with temporary detours.

Segment 3 – Includes the portion where the alignment is within the CR 52 until it crosses back to the south of CR 52, right before crossing CR 3. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along CR 1 from the north, and exit along CR 3 to the south. This segment is approximately 950 feet in length. In total, it is anticipated that this area will be impacted for approximately 4 weeks. The alignment is within CR 52 ROW for most of the segment. The alignment is in the ROW in this area in order to minimize impacts to landowners and trees on either side of the road in this constricted area. Since CR 52 is a gravel road in this area, the pipeline within County Road 52 will be installed with an open cut method. However, homeowner access will be maintained at all times with temporary detours. The road will be restored to current conditions, so only temporary impacts to the roadway are expected.

MEMORANDUM

Segment 4 – Includes the stretch that crosses CR 3, and Brooklind Estates/Barry Lane and continues to parallel the south side of CR 52 until the point where the alignment pinches in closer to the road near residences along CR 52. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along N Frontage Road from the north, and exit along CR 3 to the south. This segment is approximately 2,400 feet in length. In total, it is anticipated that this area will be impacted for approximately 5 weeks. The alignment is south of CR 52 for the majority of the segment. The pipeline does cross CR 3 at the east end of the segment. Since CR 3 is a gravel road in this area, the pipeline across County Road 52 will be installed with an open cut method. However, only one lane at a time will be closed and flaggers will be on site so traffic will not be restricted. The road will be restored to current conditions, so only temporary impacts to the roadway are expected. The segment also crosses Barry Lane/Brooklind Estates. This crossing will be a trenchless crossing at the road is paved in this location. Since the crossing will be trenchless, no roadway or traffic impacts are expected.

Segment 5 – Includes the stretch that is very close to CR 52 ROW before it jogs back further to the south of CR 52. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along N Frontage Road from the north, and exit along CR 3 to the south. This segment is approximately 400 feet in length. In total, it is anticipated that this area will be impacted for approximately 5 weeks. The alignment will be constructed closer to the CR 52 roadway than other segments. This was done to minimize impacts to landowners and trees on either side of the road in this constricted area. Due to the close proximity of the alignment to the road for this small segment, construction staging will likely occur in one lane, but there will be no excavation in the roadway. Only one lane at a time will be closed for staging and flaggers will be on site so traffic will not be restricted. Access to residences in the area will be maintained at all times.

Segment 6 – Includes the stretch that is south of CR 52 through the point where the alignment crosses CR 52 to be on the north side again. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along N Frontage Road from the north, and exit along CR 3 to the south. This segment is approximately 1,750' feet in total length including the crossing of CR 52. In total, it is anticipated that this area will be impacted for approximately 5 weeks. The alignment is south of CR 52 for the majority of the segment. The pipeline does cross CR 52 from the south side of the road to the north side of the road at the end of the segment. This crossing was included in order to avoid impacts to residences on the south side of the road and avoid a pond. Since CR 52 is a paved road in this area, the pipeline across County Road 52 will be installed with a trenchless method. Since the crossing will be trenchless, no roadway or traffic impacts are expected.

Segment 7 – Includes the portion that parallels the north side of CR 52 before the alignment heads north east of the golf course and includes the crossing of Broadacre Lane. Construction and materials delivery vehicles will access the alignment via CR 52. In most cases, the vehicles will enter along N Frontage Road from the north, and exit along CR 3 to the south. This segment is approximately 2,900 feet in length, including the crossing of Broadacre Lane. In total, it is anticipated that this area will be impacted for approximately 6 weeks. The alignment is north of CR 52 for the entire length of the segment. The pipeline does cross Broadacre Lane at the east end of the segment. Since Broadacre Lane appears to be a gravel residential drive, the pipeline across Broadacre Lane will be installed with an open cut method.

MEMORANDUM

However, homeowner access will be maintained at all times with temporary detours. The road will be restored to current conditions, so only temporary permanent impacts to the roadway are expected.

Bold Venture Way/Grey Rock Drive

The scope of analysis and segments near Bold Venture Way/Grey Rock Drive are shown in Figure 6 below. The alignment was broken into two segments.

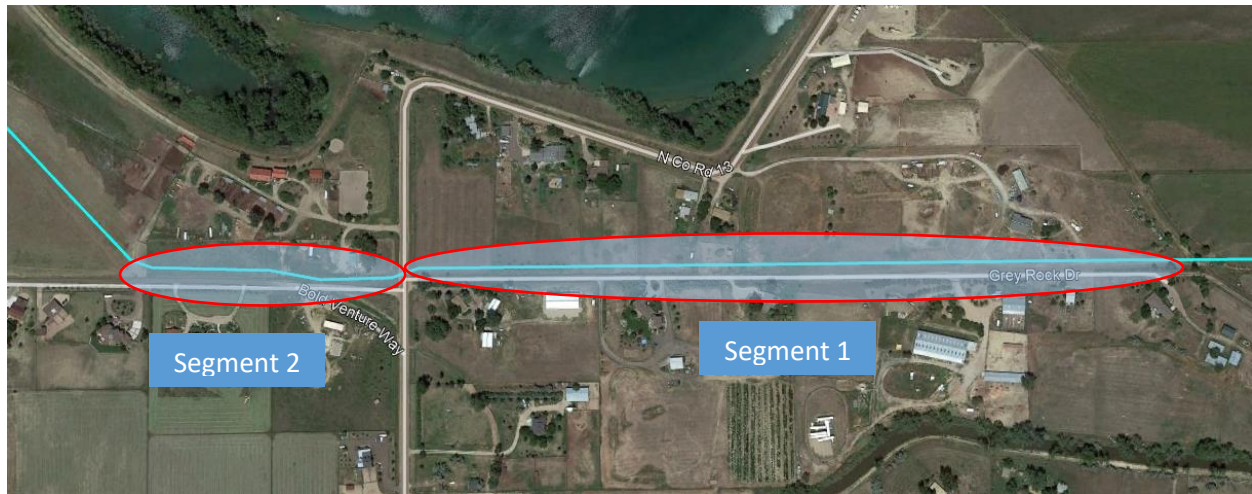


Figure 6: Scope of analysis and segments near Bold Venture Way and Grey Rock Drive

Overall Construction Duration

Construction throughout the two segments will be overlapping, not additive nor independent of each other. In total, estimated duration of construction through this area is around 10 weeks.

A proposed comprehensive timeline for construction throughout both segments (approx. 3,500' in total) is displayed in Figure 7. The three major phases of construction are indicated in the figure.

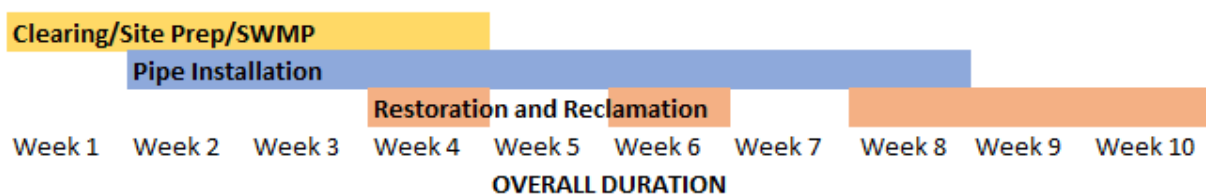


Figure 7: Overlapping construction timeline and phases

As illustrated in Figure 7 above, the estimated durations for each construction phase through Bold Venture Way/Grey Rock Drive area are as follows:

1. Clearing/Site Prep/SWMP – 4 weeks
2. Pipe Installation for All Segments – 5-7 weeks

3. Restoration and Reclamation – 5 weeks

Construction Duration/Access by Segment

Construction access will be specified by individual segments, as identified in Figure 6. Specifying construction access points for each segment will ensure that the least amount of disruption to homeowners and private roadways is maintained. Construction access will be coordinated with individual landowners and the pipeline contractor. Access is subject to change.

Construction activities throughout all segments will occur concurrently to expedite the overall process. Approximate durations of impact provided below for each segment will be overlapping, and should not be summed for a total duration of impact.

Segment 1 – Following the north side of Grey Rock Drive from the dead end to the east up to the crossing of County Road 13 to the west. Construction and materials delivery vehicles will access the alignment via the alignment as it connects to CR 54, to the southeast. In most cases, the vehicles will enter the site from CR 54 to the south, where they will follow the alignment until they reach Grey Rock Drive, and will exit along CR 13 headed south. This segment is approximately 2,500 feet in length. In total, it is anticipated that this area will be impacted for approximately 6 weeks. The alignment is north of Grey Rock Drive for the entire stretch, so no permanent impacts are expected to the roadway.

Segment 2 – Crossing of County Road 13 and paralleling of Bold Venture Way to the north. Construction and material delivery vehicles will access the alignment via the alignment as it connects to Highway 1 to the west. In most cases, the vehicles will enter the site from Highway 1, where they will follow the alignment until they reach Bold Venture Way, and will exit along CR 13 headed south. This segment is approximately 1,000 feet in length, including the crossing of CR 13. In total, it is anticipated that this area will be impacted for approximately 4 weeks. The pipeline across County Road 13 will be installed with an open cut method. However, only one lane at a time will be closed and flaggers will be on site so traffic will not be restricted. The road will be restored to current conditions, so only temporary impacts to the roadway are expected. Otherwise, the alignment is north of Bold Venture Way for the entire stretch, so no permanent impacts are expected to the roadway.

Availability of Space for Other Pipeline in Preferred Corridor

Northern Water has not identified a need for an additional pipe in this corridor for its conveyance needs. Should another entity petition the County for a permit to construct a pipeline in parallel to Northern Water's pipeline, adequate space generally exists to accommodate that pipeline. Northern Water will typically acquire 40 feet of permanent easement plus an additional 60 feet of temporary easement for this project. If another pipeline were to be approved by the County, its permanent easement could abut or overlap Northern Water's permanent easement and they could use Northern Water's permanent easement as their temporary easement.

MEMORANDUM

Northern Integrated Supply Project
Glade Reservoir
Construction Staging

B&V Project Number 403758
B&V File 188754/34.3000
June 10, 2020

To: Larimer County Planning Department
From: Tim Engemoen and Arlene Little, Black & Veatch

Introduction

This technical memorandum identifies probable construction staging areas and construction material sourcing associated with construction of the Glade Unit. This has been done in support of the Larimer County 1041 Permit for the Glade Unit construction. For purposes of this memorandum, construction staging areas are defined as locations used for the storage of construction related equipment and materials, such as office trailers, vehicles and stockpiles.

Project Background

The Northern Integrated Supply Project (NISP) will provide a new raw water supply to several municipal water providers in Northern Colorado. NISP includes the following facilities located in Larimer County: the Glade Unit; the Glade Pump Station; raw water distribution piping; and the relocation of U.S. Hwy. 287. The Glade Unit features the Glade Reservoir Dam, which is an earthen embankment that impounds an off-channel reservoir complete with hydraulic structures required by the State Engineer's Office: the High Level Outlet Works (HLOW); Low Level Outlet Works (LLOW); and spillway.

The Glade Unit also includes expansion of the existing Poudre Valley Canal (PVC) and a new forebay downstream of the dam. 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 to allow increased diversion of flow from the Poudre River. A portion of the existing Munroe Gravity Canal alignment will be inundated by Glade Reservoir, this open canal will be 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. Raw water will be conveyed off site via several buried conduits that are discussed in separate reports. The Glade Unit will include recreational amenities for the general public, including a Visitor Center, campgrounds, a boat ramp, trails and restroom facilities.

Glade Reservoir will submerge a portion of the existing U.S. Hwy. 287 alignment which will be relocated to the east of the reservoir. An existing power transmission line and several power distribution lines will be inundated by the reservoir which will be relocated as part of the Glade Unit construction. A general location map of the Glade Unit facilities is presented on Figure 1.

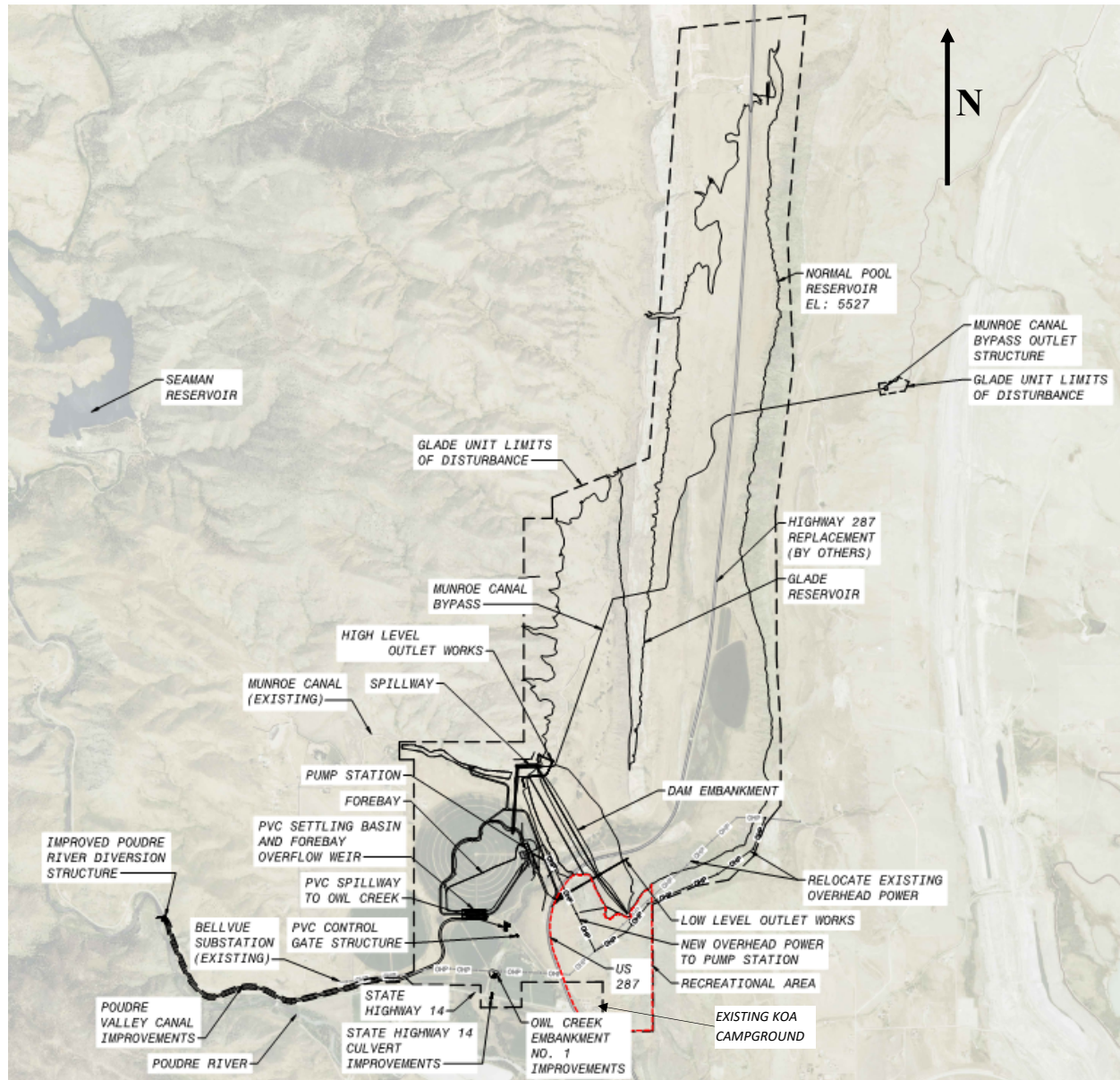


Figure 1 - Glade Unit Overview

Construction Staging Locations

The Glade Unit will be constructed under multiple construction contracts spread out over the project area depicted in Figure 1. The different contracts will likely be executed at different times. Therefore, construction associated with the Glade Unit will not occur concurrently. However, detailed scheduling of

the work will occur in discussion with the with the Construction Manager/General Contractor (CMGC) in 2021.

Without benefit of CMGC input at this time, the design engineer developed a construction contract breakdown and their associated estimated construction schedules.

- Contract 1 – Main Dam Embankment, Forebay, MCB – Construction early 2023 through 2027.
- Contract 2 – Poudre Valley Canal and Owl Creek Improvements – Construction during winters of 2022-2023, 2023-2024, 2024-2025, and 2025-2026. The work within the canal can only be completed when the canal is empty and not conveying irrigation water.
- Contract 3 – Glade Pump Station – Construction late 2024 through 2027.
- Contract 4 – 115 kV Overhead Powerline Relocation – Construction 2023.
- Contract 5 – Electrical Substation – Construction mid-2025 to mid-2027.

The following sections describe likely construction staging locations and strategies for the different components of the Glade Unit project.

Glade Reservoir, Forebay, and Wetlands

It is anticipated the construction of the reservoir, forebay, and wetlands will be completed in two phases to allow for continual presence of wetlands during construction. For both phases, the former KOA campground (east of Ted's Place at the intersection of U.S. Hwy. 287 and State Hwy. 14) will likely be used by the contractor as a temporary construction camp to include trailers, bathrooms, and laydown areas for equipment and materials.

Northern owns, or will own by the time of construction, all the land for the embankment, reservoir pool, and forebay; thus, the contractor will be able to use all this land for construction staging. Borrow material to construct the dam embankment will be taken from several locations across the project site (forebay location, east and west reservoir pool locations) so there will likely be heavy equipment and material stockpiles at various locations at any given time. It is anticipated that there will be routine construction traffic between the former KOA campground and the active construction site(s).

During Phase One, U.S. Hwy. 287 will still be in service through the project site. Phase One construction activities include the following:

- Excavation and foundation preparation for the embankment across the main valley to the west of the existing U.S. Hwy. 287 alignment.
- Tunneling of the LLOW, including upstream and downstream portal excavation which are located to the east of the existing U.S. Hwy. 287 alignment.
- Construction of new wetlands and habitat area on the east and west side of Owl Creek north of the PVC.

At the beginning of Phase Two construction, U.S. Hwy. 287 will be re-routed to its new alignment and the contractor will advance the construction of the embankment across the existing U.S. Hwy. 287 right-of-way. The tunnel for the LLOW will have been completed as part of the Phase One construction and this tunnel will now be used to bypass surface flows from Owl Creek around the construction site.

Glade Pump Station

The Glade Pump Station is located adjacent to the Forebay, just to the south of the dam embankment as shown in Figure 1. The exact staging area for the pump station will likely be adjacent to the forebay in the area between the forebay and the dam embankment.

Poudre Valley Canal

The PVC is being expanded from the Poudre River Diversion Structure to just east of the proposed forebay location. Temporary construction easement will be acquired along this stretch of the canal to provide the contractor adequate room for construction activities and for staging materials and equipment. Construction along the PVC will start at one end of the canal and progress either upstream or downstream so the entire area of the upgraded PVC will not all be impacted at the same time. Part of the PVC expansion will be widening the canal, and due to the proximity to State Hwy. 14, traffic will likely be temporarily reduced to a single lane during construction activities. As previously stated, construction of the canal will only take place during non-irrigating months when the canal is not flowing water.

One of the improvements to the PVC is the upgrade and expansion of the Poudre River Diversion Structure located at the west end of the Glade Unit (shown on Figure 1). The site of the Diversion Structure will likely be used by the Contractor as a main staging area for the PVC improvements for equipment and material storage.

Owl Creek

Improvements to Owl Creek include upgrading an embankment situated between the PVC and State Hwy. 14 and expanding the culvert crossing at State Hwy. 14. Access will come from State Highway 14. Temporary Construction easement will be acquired adjacent to Owl Creek to accommodate construction activities and materials staging.

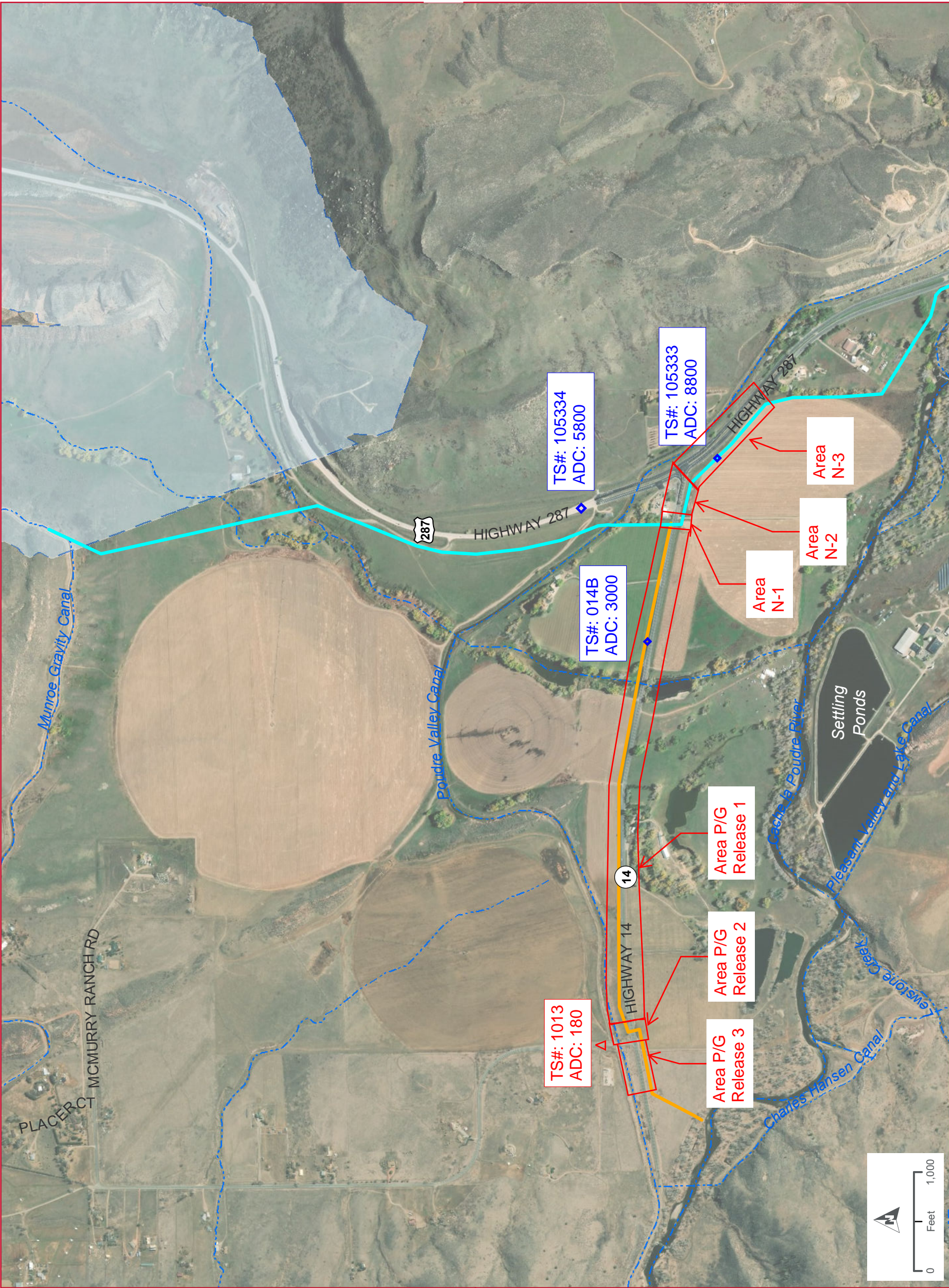
Munroe Canal Bypass and 115 kV Overhead Powerline

The Munroe Canal is an existing irrigation canal that extends across the proposed Glade Reservoir pool. One of the components of construction Contract 1 is to convert a portion of the canal into a closed conduit system (steel pipe encased in concrete) through the reservoir pool. The MCB Inlet Structure is located on the right abutment of the main dam near the spillway and will likely share construction staging areas with the dam embankment work. The MCB Outlet Structure, located near the northeast portion of the reservoir (shown in Figure 1) is remote from other construction activities and will likely need temporary construction easement to provide adequate space for construction materials and equipment.

A portion of an existing 115 kV overhead powerline will be relocated since the existing alignment is partially contained within the reservoir pool. New permanent and temporary easement will be acquired as needed for material and equipment staging during the construction of the new overhead powerline. Like the work along the PVC, this work will progress in a linear fashion and the areas of disturbance will be limited at any given time.

Construction Material Sourcing

Construction of the dam embankment will require a vast amount of material including both soil and rock. The intent is to source most of the dam material on site from identified borrow areas located at the forebay location and the east and west reservoir pool locations. Analysis is still ongoing to determine the estimated amount of soil and rock available onsite for construction purposes. If adequate material cannot be produced from the borrow locations on site, some material may need to be imported from local quarries. It is anticipated that imported material will be brought to site using the I-25 and State Hwy. 14 haul route.



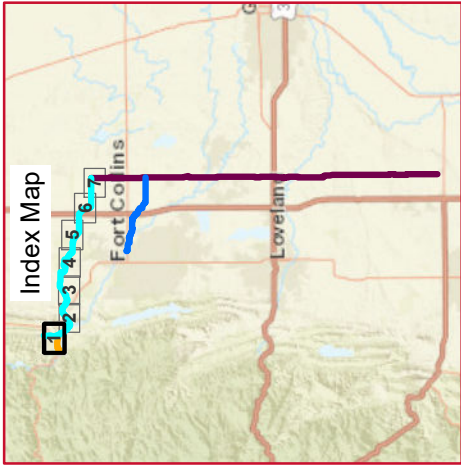
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SHEET 1 OF 7

MAP SERIES 6: TRAFFIC STUDY

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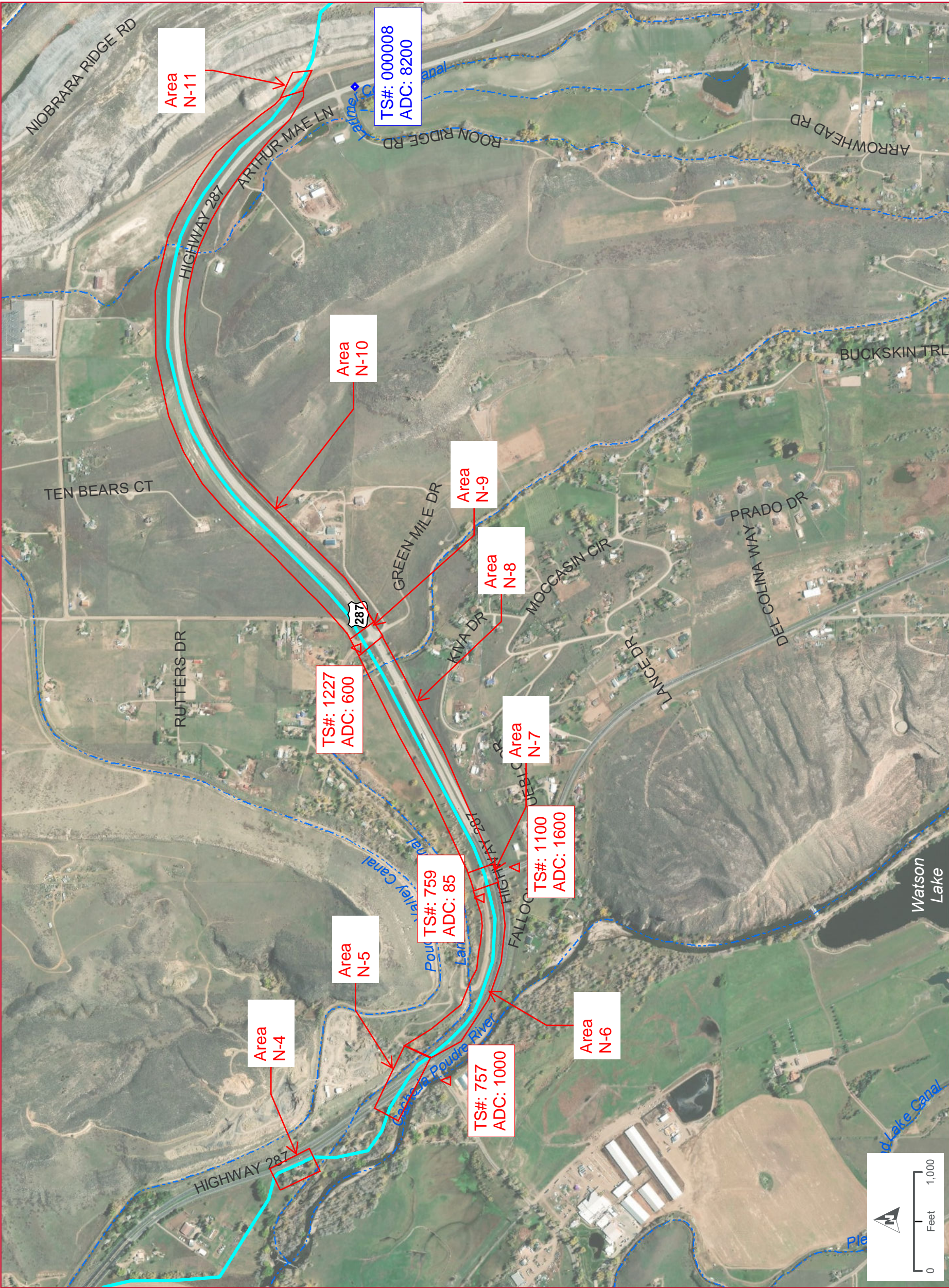
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- Northern Tier Pipeline
- Poudre Intake Pipeline
- County Line Pipeline
- County Boundary
- Railroad
- Stream/Ditch
- Glade Reservoir (future)

- TS#: Traffic Station Number
- ADC: Average Daily Count
- Larimer County Traffic Count Station
- CDOT Traffic Count Station



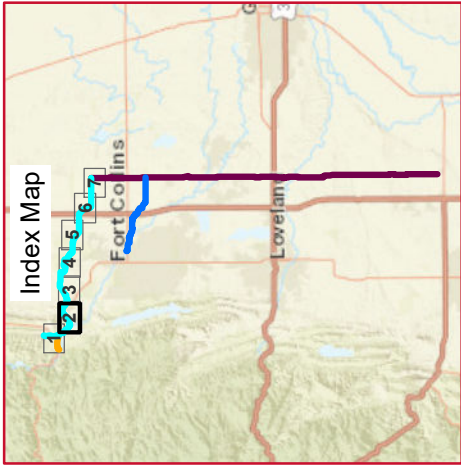
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DATA SOURCES: Northern Water, Larimer County, HDR



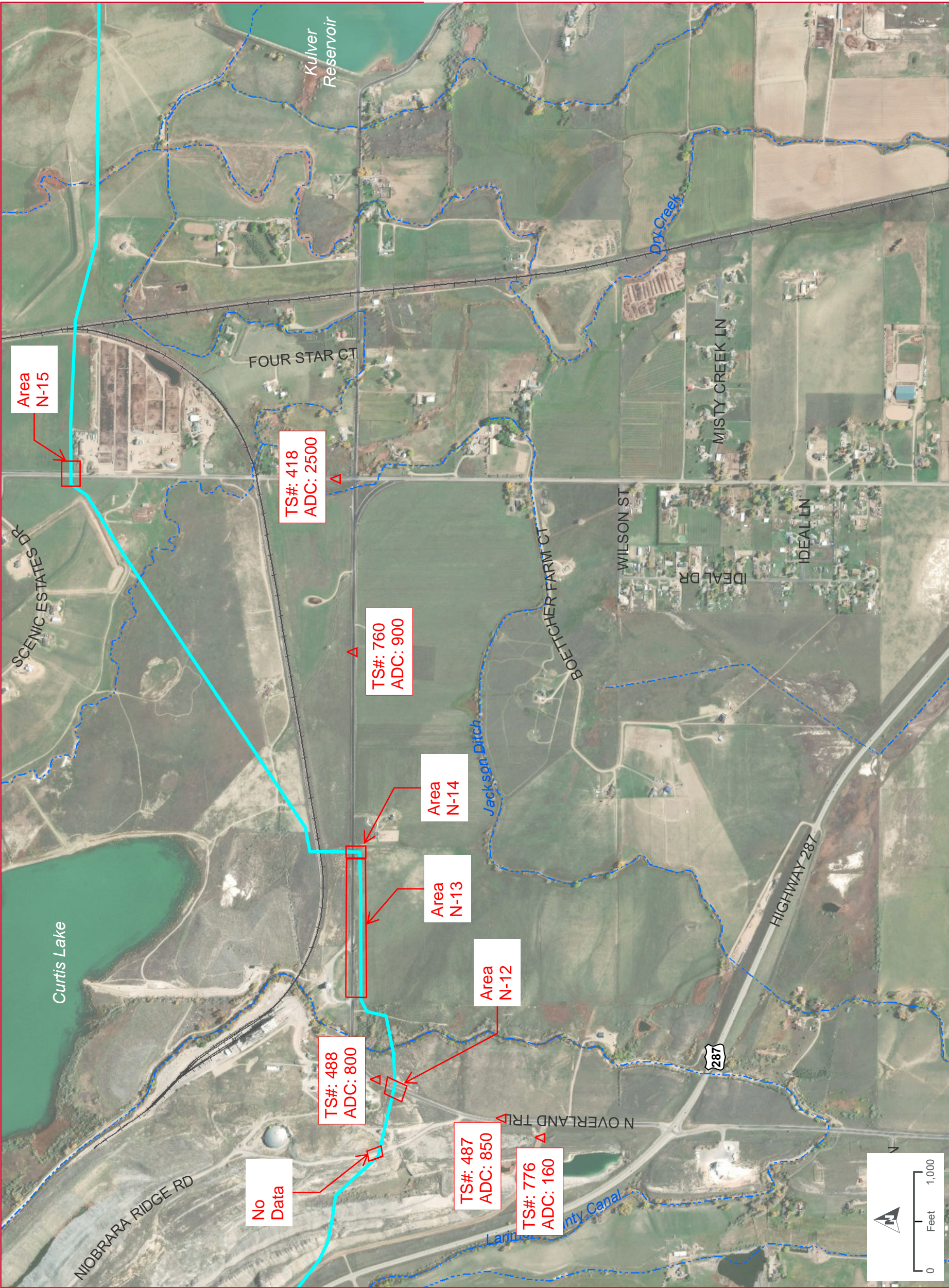
NORTHERN TIER
SHEET 2 OF 7
MAP SERIES 6: TRAFFIC STUDY

- Legend**
- Glade Release/Poudre Release Pipeline
 - Northern Tier Pipeline
 - Poudre Intake Pipeline
 - County Line Pipeline
 - County Boundary
 - Railroad
 - Stream/Ditch
 - Glade Reservoir (future)
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 - ADC: Average Daily Count
 - Larimer County Traffic Count Station
 - CDOT Traffic Count Station



Imagery Date: 10/2017

DATA SOURCES: Northern Water, Larimer County, HDR



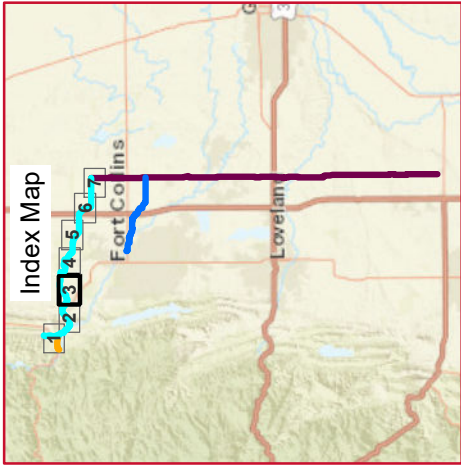
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SHEET 3 OF 7

MAP SERIES 6: TRAFFIC STUDY

Legend

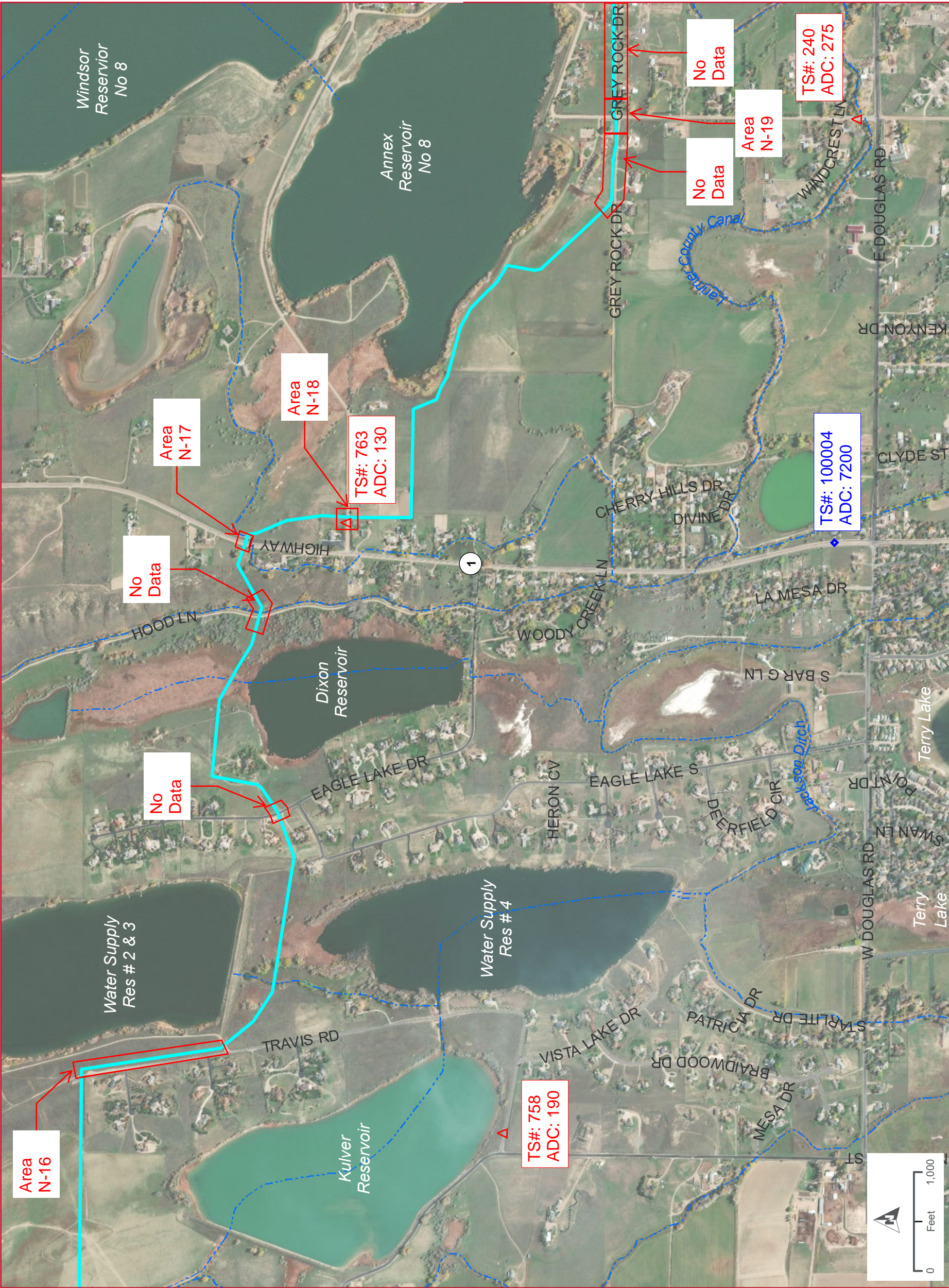
- Glade Release/Poudre Release Pipeline
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- County Line Pipeline
- County Boundary
- Railroad
- Stream/Ditch
- Glade Reservoir (future)

- TS#: Traffic Station Number
- ADC: Average Daily Count
- Larimer County Traffic Count Station
- CDOT Traffic Count Station



Imagery Date: 10/2017

DATA SOURCES: Northern Water, Larimer County, HDR



NORTHERN TIER
SHEET 4 OF 7
MAP SERIES 6: TRAFFIC STUDY

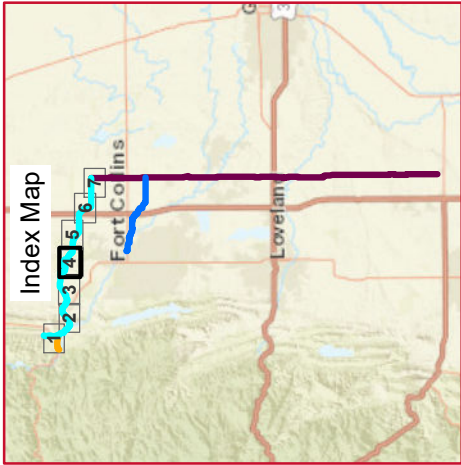
- Legend**

 - Glade Release/Poudre Release Pipeline
 - Northern Tier Pipeline
 - Poudre Intake Pipeline
 - County Line Pipeline
 - County Boundary
 - Railroad
 - Stream/Ditch
 - Glade Reservoir (future)
- TS#: Traffic Station Number

ADC: Average Daily Count

▲ Larimer County Traffic Count Station

◆ CDOT Traffic Count Station



Imagery Date: 10/2017

DATA SOURCES: Northern Water, Larimer County, HDR

MAP SERIES 6: TRAFFIC STUDY

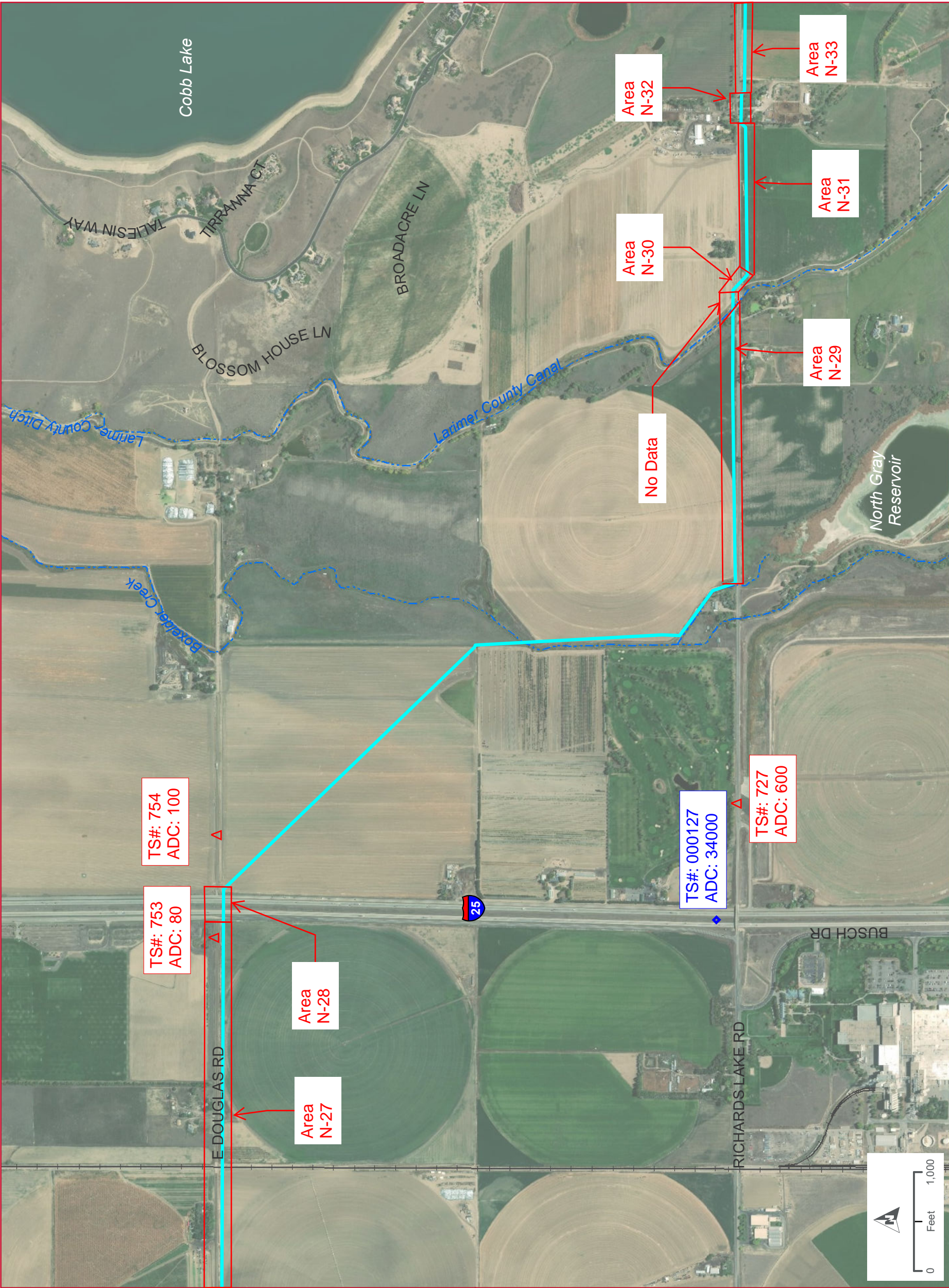
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 County Boundary
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 Stream/Ditch
 Glade Reservoir (future)

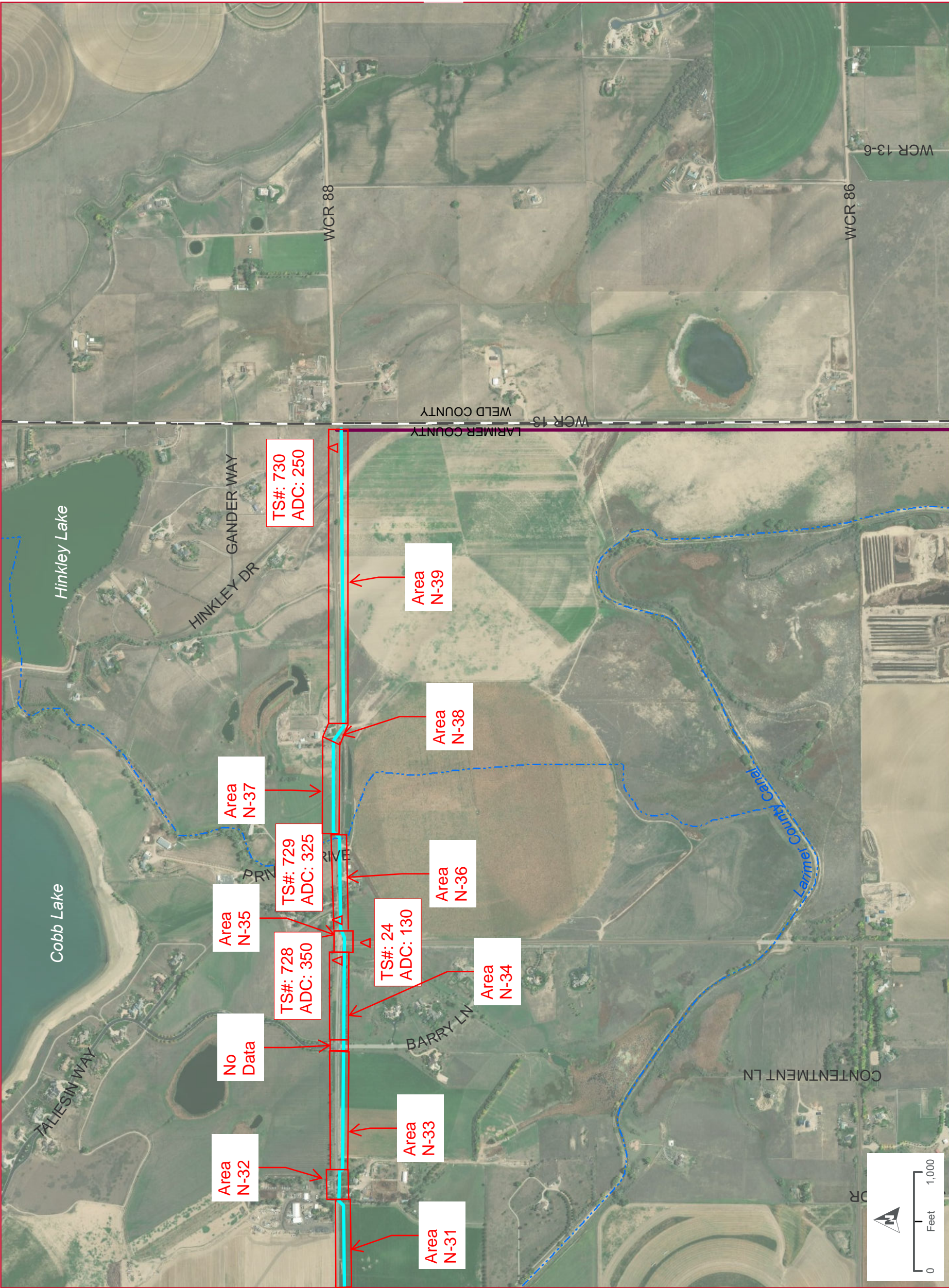
ADC: Average Daily Count

CDOT Traffic Count Station

DATA SOURCES: Northern Water, Larimer County, HDR







NORTHERN TIER
SHEET 7 OF 7
MAP SERIES 6: TRAFFIC STUDY

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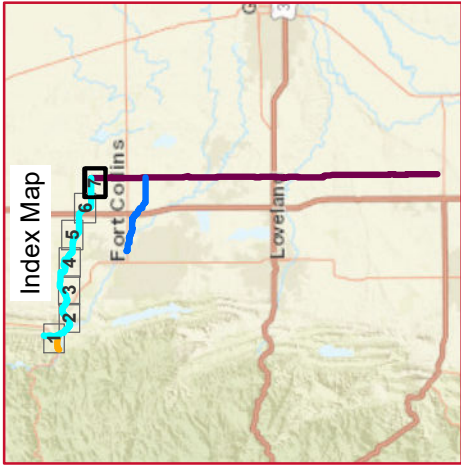
- Glade Release/Poudre Release Pipeline
- Northern Tier Pipeline
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- Glade Reservoir (future)

TS#: **Traffic Station Number**

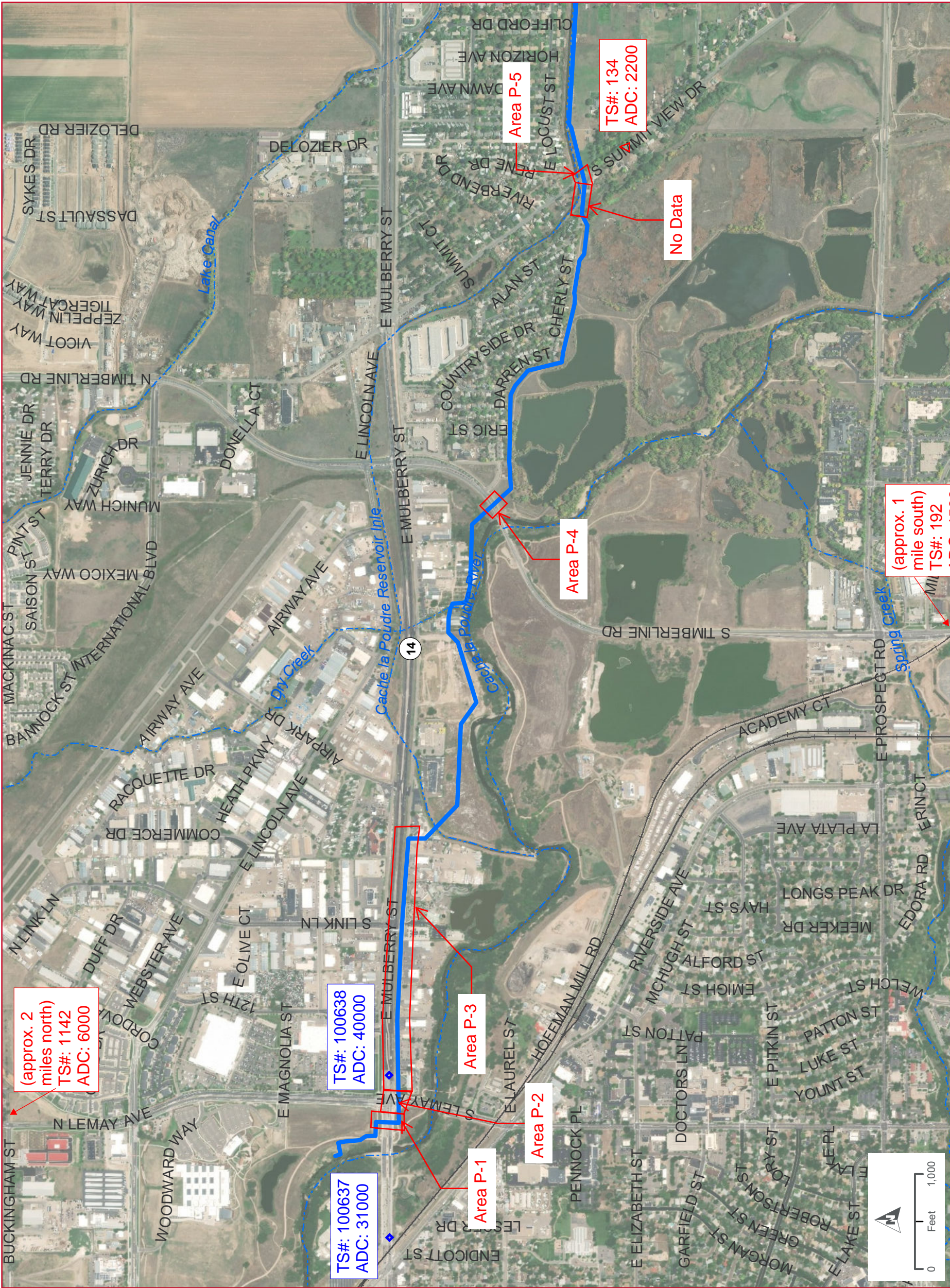
ADC: **Average Daily Count**

Larimer County Traffic Count Station

CDOT Traffic Count Station



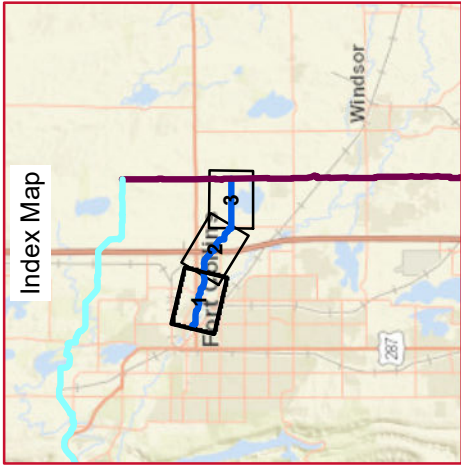
DATA SOURCES: Northern Water, Larimer County, HDR



POUDRE INTAKE PIPELINE
SHEET 1 OF 3
MAP SERIES 6: TRAFFIC STUDY

Legend

- Poudre Intake Pipeline
- County Line Pipeline
- Northern Tier Pipeline
- County Boundary
- Railroad
- Stream/Ditch
- TS#: Traffic Station Number
- ADC: Average Daily Count
- Larimer County Traffic Count Station
- CDOT Traffic Count Station



Imagery Date: 08/2018, 10/2018

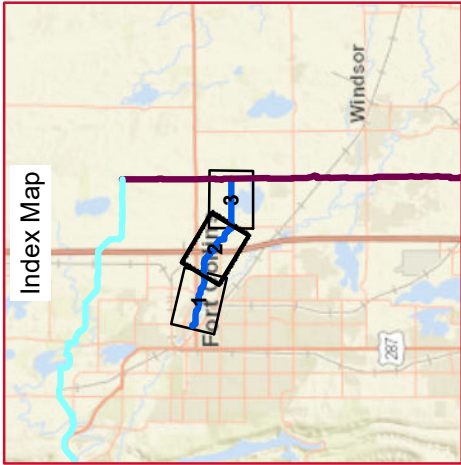
DATA SOURCES: Northern Water, Larimer County, HDR



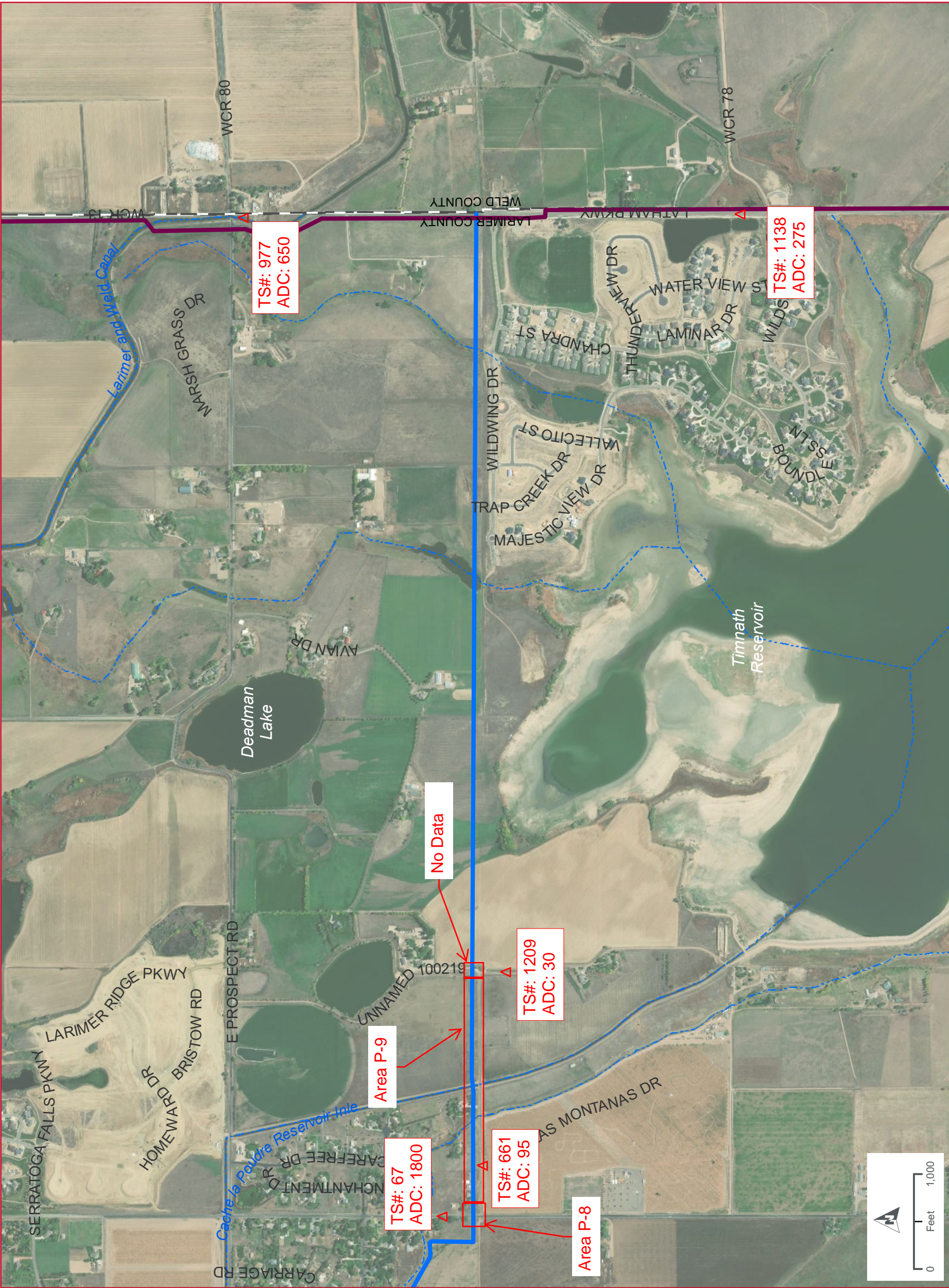
POUDRE INTAKE PIPELINE
SHEET 2 OF 3
MAP SERIES 6: TRAFFIC STUDY

Legend

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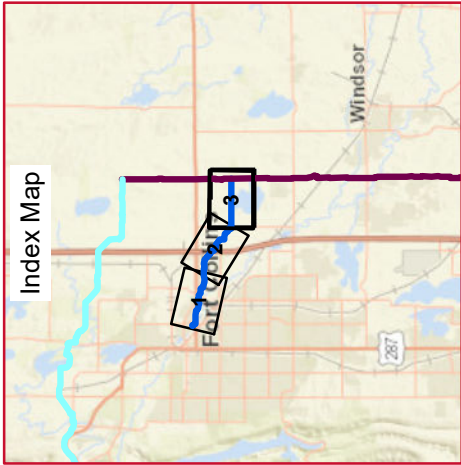
Imagery Date: 10/2018
DATA SOURCES: Northern Water, Larimer County, HDR



POUDRE INTAKE PIPELINE
SHEET 3 OF 3
MAP SERIES 6: TRAFFIC STUDY

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Imagery Date: 10/2018
DATA SOURCES: Northern Water, Larimer County, HDR

MEMORANDUM

Date: June 10, 2020

To: Larimer County Planning Department

From: Randy Parks and Derek Nelson - Dewberry Engineers Inc.

Subject: Northern Integrated Supply Project – Traffic Impact Study – Revised June 2020



This section addresses requirements of the 1041 Permit item 8.d for Traffic Impact Study. It describes the effects of the NISP conveyance facilities that are within unincorporated parts of Larimer County. Such facilities include:

- Northern Tier Pipeline
- Poudre Release/Glade Release Pipeline
- Poudre Intake Pipeline
- County Line Pipeline
- Glade Reservoir Pump Station
- Poudre Diversion Pump Station

Methods

Effects on traffic and transportation were assessed based on existing roadway information from the Larimer County Road Information Locator webpage and, when needed, from CDOT Road Traffic Count data. The most recent available data from Larimer County was used, which came from the years 2000, 2009, 2015, 2017, and 2018; depending upon the node. Traffic volumes obtained from CDOT were conducted in 2014. The road classification and Annual Average Daily Traffic (ADT) count from nodes that were available along the alignments can be seen in Map Series 6 in Attachment D to the Project Description.

Since the County Line Pipeline is parallel and adjacent to the roadway, good traffic data existed along the entire alignment. The tabulated data was taken from the ADT found after one another and averaged. The reach between nodes were then designated as a work area. This data is presented in table 4.

Since the Northern Tier Pipeline, Poudre Intake Pipeline, and Poudre Release/Glade Release Pipeline do not parallel roadways consistently, data was tabulated through an alternative method by creating “Traffic Study Areas” which can be seen in map series 6 in Attachment D to the Project Description. Additionally, the density of traffic station locations was significantly less than along the County Line Pipeline, which necessitated a modified approach. Tables 1-3 in this memo list all areas, relevant traffic stations, traffic counts, approximate length of crossing, street impact, closure requirements and estimated duration for the Northern Tier, Poudre Intake, and Poudre Release/Glade Release Pipelines. The Traffic Study Areas were broken up as portions of the pipeline that parallel roadways within 100 feet, cross roadways with trenchless crossings, or cross gravel roads.

General NISP Conveyance Information

An alternatives alignment study was performed and the preferred alignment for NISP conveyance can be found as part of the Conveyance Routing Assessment (Technical Memorandum 3). Although the final design of the pipeline will be developed at a later date, the NISP conveyance lines are expected to have a 60-foot permanent easement and a 40-foot temporary construction easement. The NISP pipelines are planned to be routed as much as possible in private easement rather than public right-of-way. By routing most of the pipeline in private easements traffic impacts will be lessened.

Crossings

Water pipeline road crossings in Larimer County will be constructed using trenchless methods on all paved roadways and open-cut construction on unpaved roadways. A list of all anticipated trenchless and open-cut crossings is presented in Tables 1-4. Trenchless construction methods would cause only minor disruption to traffic and would have negligible short-term effects. Any roadway that is unpaved (e.g. gravel) would use open-cut construction. Open-cut construction of pipelines would require a trench to be dug along the length of the pipeline, affecting the segment of the road that requires the trench. The pipeline would then be laid in the trench, and the trench would be backfilled to pre-existing conditions. Roadways that would be open-cut would either have temporary lane closures or would be closed to traffic, and a detour route would be provided during construction. The NISP conveyance will likely cross the Great Western and Union Pacific Railroads in several places. Trenchless construction methods would be used at the railroad crossings.

General Compliance

For all pipeline alignments adjacent to or crossing the road ROW, Northern Water and/or construction contractors would be required to develop traffic control plans. Traffic control plans would be subject to approval by the transportation agency responsible for the impacted roadway. As such, short-term effects on local roadways during construction are expected to be minor for construction areas. If the level of construction activity impacted traffic to a greater magnitude than anticipated, the construction contractor would work with the responsible transportation agency to reduce the traffic effect to an acceptable level based on their policies and standards.

Further, it is understood that during final design, Northern Water will be required to represent anticipated haul/delivery routes and coordinate same with Larimer County.

All activities in or adjacent to, access to and from, and including hauling/delivery on Larimer County roads/ROW must abide by the Larimer County Access Policy and Larimer County Land Use Code.

Mitigation

Mitigation of traffic impacts will be addressed on a road-by-road basis and for local community/residences/businesses during final design. General mitigation measures that may be implemented include:

- Utilization of major roads and bridges for haul routes whenever feasible.

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- Minimization of hauling/deliveries during peak driving hours.
- Coordination with the County and other entities to avoid planned concurrent road construction.
- Coordination with local schools on bus routes and pickup or drop-off times.
- Maintenance of access to residents and businesses to include emergency vehicles, trash pickup, and postal/delivery services.
- Stabilized construction access in accordance with erosion control and streets ordinances.
- Dust control during construction.

Durations

Construction durations per work area were estimated with production rates using factors including pipe diameter, route complexity, route length, available construction corridor area and access, utility density, and terrain challenges. Estimated construction durations per work area can be found in Tables 1-4.

Revisions

Updates were made to the memo after receiving comments from the Larimer County Planning Department in May 2020. Public and private gravel road crossings were added to the ROW impact tables for Northern Tier, Poudre Intake and Glade/Poudre Release alignments, as well as other roadway impacts that were not included in the original memo. Lengths and duration of impact were updated as needed to account for additional crossings or other reasons.

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Table 1- Northern Tier Annual Average Daily Traffic (ADT)

	Traffic Station 1 Type	Traffic Station 1	Traffic Count 1	Traffic Station 2 Type	Traffic Station 2	Traffic Count 2	Traffic Count Used	Approx. Length (ft)	Street Impacted	Type of Impact	Closure Required?	Estimated Duration (Days)
Area N-1	CDOT	014B	3000	-	-	-	3000	150	HW 14	Trenchless Crossing	No	5
Area N-2	CDOT	014B	3000	-	-	-	3000	400	HW 14	Parallel	No	2
Area N-3	CDOT	105333	8800	-	-	-	8800	1200	HW 287	Parallel	No	6
Area N-4	CDOT	105333	8800	CDOT	000008	8200	8500	500	HW 287	Parallel	No	5
Area N-5	CDOT	105333	8800	CDOT	000008	8200	8500	500	HW 287	Trenchless Crossing	No	17
Area N-6	CDOT	105333	8800	CDOT	000008	8200	8500	2,100	HW 287/CR 56	Parallel	No	21
Area N-7	LC	759	85	LC	1227	600	343	100	CR 56	Gravel Crossing	No- single lane flagged	3
Area N-8		105333	8800	CDOT	000008	8200	8500	2,500	HW 287	Parallel	No	13
Area N-9	LC	759	85	LC	1227	600	343	100	CR 56	Gravel Crossing	No- single lane flagged	3
Area N-10		105333	8800	CDOT	000008	8200	8500	6,600	HW 287	Parallel	No	33
Area N-11	LC	776	160	-	-	-	160	100	CR 56 E	Gravel Crossing	No- single lane flagged	3
No Data	-	-	-	-	-	-	-	100	CR 21C/ Niobrara Rodge	Gravel Crossing	No- single lane flagged	3

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Area N-12	LC	488	800	LC	487	850	825	100	CR56/ CR 21-C/ Overland Trail	Trenchless Crossing	No	3
Area N-13	LC	488	800	LC	760	900	850	1500	CR56/ CR 21-C/ Overland Trail	Parallel	No	8
Area N-14	LC	488	800	LC	760	900	850	100	CR56/ CR 21-C/ Overland Trail	Trenchless Crossing	No	3
Area N-15	LC	418	2500	-	-	-	2500	100	Taft Hill Rd	Trenchless Crossing	No	3
Area N-16	LC	758	190	-	-	-	190	1500	Travis	Parallel	No	8
No Data	-	-	-	-	-	-	-	100	Eagle Lake Dr	Trenchless Crossing	No	3
No Data	-	-	-	-	-	-	-	100	Hood Lane	Gravel Crossing	Homeowner access maintained with temporary detours	1
Area N-17	CDOT	100004	7200	-	-	-	7200	250	HW 1	Trenchless Crossing	No	8
Area N-18	LC	763	130	-	-	-	130	100	E CR 56	Gravel Crossing	No- single lane flagged	3
No Data	-	-	-	-	-	-	-	900	Grey Rock	Parallel	No	5
Area N-19	LC	240	275	-	-	-	275	100	N CR 13	Gravel Crossing	No- single lane flagged	3
No Data	-	-	-	-	-	-	-	2500	Grey Rock	Parallel	No	13

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Area N-20	LC	199	130	LC	200	80	105	100	Turnberry	Gravel Crossing	No- single lane flagged	3
Area N-21	LC	750	1400	LC	751	1400	1400	100	CR 54/ Douglas	Trenchless Crossing	No	3
Area N-22	LC	750	1400	LC	751	1400	1400	1600	CR 54/ Douglas	Parallel	No	8
Area N-23	LC	750	1400	LC	751	1400	1400	100	CR 54/ Douglas	Trenchless Crossing	No	3
Area N-24	LC	750	1400	LC	751	1400	1400	1100	CR 54/ Douglas	Parallel	No	6
Area N-25	LC	140	2400	-	-	-	2400	100	Giddings	Trenchless Crossing	No	3
Area N-26	LC	752	90	LC	753	80	85	100	CR 54/ Douglas	Gravel Crossing	No- single lane flagged	3
Area N-27	LC	752	90	LC	753	80	85	5000	CR 54/ Douglas	Parallel	No	25
Area N-28	CDOT	000127	34000	-	-	-	34000	350	I-25	Trenchless Crossing	No	12
Area N-29	LC	727	600	LC	728	350	475	2800	CR 52/ Richards Lake	Parallel	No	14
No Data	-	-	-	-	-	-	-	100	Broadacre Lane	Gravel Crossing	Homeowner access maintained with temporary detours	1
Area N-30	LC	727	600	LC	728	350	475	250	CR 52/ Richards Lake	Trenchless Crossing	No	8
Area N-31	LC	727	600	LC	728	350	475	1500	CR 52/ Richards Lake	Parallel	No	8

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Area N-32	LC	727	600	LC	728	350	475	400	CR 52/ Richards Lake	Parallel	No- single lane flagged. Construction staging in lane, but no excavation in road.	10
Area N-33	LC	727	600	LC	728	350	475	1200	CR 52/ Richards Lake	Parallel	No	6
No Data	-	-	-	-	-	-	-	100	Barry Lane/ Brooklind Estates	Trenchless Crossing	No	3
Area N-34	LC	727	600	LC	728	350	475	1000	CR 52/ Richards Lake	Parallel	No	5
Area N-35	LC	24	130	-	-	-	130	100	CR 3	Gravel Crossing	No- single lane flagged	3
Area N-36	LC	729	325	LC	730	250	288	950	CR 52/ Richards Lake	Construction in Gravel road	Homeowner access maintained with temporary detours	10
Area N-37	LC	729	325	LC	730	250	288	1000	CR 52/ Richards Lake	Parallel	No	5
Area N-38	LC	729	325	LC	730	250	288	100	CR 52/ Richards Lake	Gravel Crossing	No- single lane flagged	3
Area N-39	LC	729	325	LC	730	250	288	3000	CR 52/ Richards Lake	Parallel	No	15

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Table 2- Poudre Intake Annual Average Daily Traffic (ADT)

	Traffic Station 1 Type	Traffic Station 1	Traffic Count 1	Traffic Station 2 Type	Traffic Station 2	Traffic Count 2	Traffic Count Used	Approx. Length (ft)	Street Impacted	Type of Impact	Closure Required?	Estimated Duration (days)
Area P-1	CDOT	100637	31000	-	-	-	31000	250	Mulberry	Trenchless Crossing	No	8
Area P-2	LC	1142	6000	-	-	-	6000	200	Lemay	Trenchless Crossing	No	7
Area P-3	CDOT	100638	40000	-	-	-	40000	2800	Mulberry	Parallel	No	28
Area P-4	LC	192	4500	-	-	-	4500	200	Timberline	Trenchless Crossing	No	7
No Data	-	-	-	-	-	-	-	400	Cherly	Construction in Paved Roads	Homeowner access maintained with temporary detours	4
Area P-5	LC	134	2200	-	-	-	2200	150	Summit View	Trenchless Crossing	No	5
Area P-6	CDOT	101036	63000	-	-	-	63000	350	I-25	Trenchless Crossing	No	12

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Area P-7	LC	671	1600	LC	672	2100	1850	150	Prospect	Trenchless Crossing	No	5
No Data	-	-	-	-	-	-	-	1000	McLaughlin	Parallel	No	7
Area P-8	LC	67	1800	-	-	-	1800	150	CR 5	Trenchless Crossing	No	5
Area P-9	LC	661	95	-	-	-	95	2500	CR 42 E	Parallel	No	17
No Data	-	-	-	-	-	-	-	100	Unnamed 100219/CR 3e	Gravel Crossing	Homeowner access maintained with temporary detours	1

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Table 3- Poudre/Glade Release Annual Average Daily Traffic (ADT)

	Traffic Station 1 Type	Traffic Station 1	Traffic Count 1	Traffic Station 2 Type	Traffic Station 2	Traffic Count 2	Traffic Count Used	Approx. Length (ft)	Street Impacted	Type of Impact	Closure Required?	Estimated Duration (days)
Area P/G R-1	CDOT	014B	3000	-	-	-	3000	5200	HW 287	Parallel	No	26
Area P/G R-2	CDOT	014B	3000	-	-	-	3000	150	HW 287	Trenchless Crossing	No	5
Area P/G R-3	CDOT	014B	3000	-	-	-	3000	700	HW 287	Parallel	No	4

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Table 4- County Line Annual Average Daily Traffic (ADT)

Work Area	Station 1	ADT 1	Station 2	ADT 2	Average Traffic Count	Trenchless Crossings (paved)	Open-Cut Crossings (gravel)	Duration (days)
C-1	983	210	982	500	355	1. Trenchless crossing 2,640-feet north of CR 48 across CR 1	0	117
						2. Trenchless crossing 1,780-feet north of CR 48 across CR 1		
						3. Trenchless crossing across CR 48 at the intersection with CR 1		
C-2	981	500	980	475	488	1. Trenchless crossing across Hwy 14 at the intersection with CR 1	0	39
C-3	979	550	978	325	438	1. Trenchless crossing across CR 44 at the intersection with CR 1	0	39
C-4	977	650	1138	275	463	1. Trenchless crossing across Wildwing Dr. at CR 1 2. Trenchless crossing 2,375-feet north of WCR 78 across CR 1	1. Open-cut crossing across WCR 78	78
C-5	1138	275	1200	2000	1138	1. Trenchless crossing diagonally across the intersection of LCR 40 and CR 1	0	195
						2. Trenchless crossing diagonally across the intersection of LCR 38 and CR 1		
						3. Trenchless crossing under railroad 6,500 feet south of LCR 38		
						4. Trenchless crossing 1,350-feet north of LCR 32E across CR 1		
						5. Trenchless crossing across LCR 32E at the intersection with CR 1		
C-6	1200	2000	1199	1500	1750	0	0	15

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C-7	1199	1500	976	4500	3000	1. Trenchless crossing across Hwy 392	0	39
C-8	976	4500	1203	4700	4600	1. Trenchless crossing 1,900 feet south of Hwy 392 across CR 2. Trenchless crossing across Steeplechase Dr 3. Trenchless crossing across Bounty Dr 4. Trenchless crossing across WCR 62	1. Open-cut crossing across WCR 64	156
C-9	1203	4700	975	4800	4750	1. Trenchless crossing 2,530 feet south of WCR 62 across CR 1 2. Trenchless crossing 4,590 feet south of WCR 62 across CR 1	1. Open-cut crossing beneath WCR 60	78
C-10	975	4800	CDOT traffic count	2200	3500	1. Trenchless crossing across Hwy 34 2. Trenchless crossing 400 feet south of Hwy 34 3. Trenchless crossing 800 feet south of Hwy 34 under railroad 4. Trenchless crossing 2,800 feet south of Hwy 34 under railroad 5. Trenchless crossing under railroad at CR 20C 6. Trenchless crossing 6,000 feet south of Hwy 34 across CR1 7. Trenchless diagonal crossing across LCR 18 8. Trenchless crossing across LCR 16 9. Trenchless crossing north of LCR 14 and CR 1 across CR1	0	351

Referral Agency Response

June 16, 2020

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

RE: Review of Larimer County application # 20-ZONE2657

To whom it may concern:

This letter is confirmation that the Wellington Fire Protection District (WFPD) has completed the review of the application and has the following comments.

1. WFPD Western boundary will be the Eastern half of the proposed reservoir. This project will require the relocation of U.S. Hwy 287. The proposed relocation route will be in WFPD response area but will not provide direct access to the new Hwy 287. We have concerns with our ability to respond in an appropriate time due to the lack of access to the new Hwy. We are requesting that there be access provided either by way of W CR 64 and N CR 21 west to intersect with the new Hwy. or W CR66 and N CR 21 West to intersect with the new Hwy.
2. As stated above WFPD will also provide service to the east portion of Glade Reservoir as well as the new route of Hwy 287. WFPD nearest station is Station 17 located at 108 W CR 66, which is approximately 4 miles east of the eastern edge of Glade Reservoir. WFPD is requesting that NISP provide the same provision that were given to Livermore Fire Protection District (LFPD). In the form of water storage tank (up to 10,000 gallons in size) at a location determined by WFPD for their use in staging water for firefighting and emergency-response capabilities. As stated by LFPD staff WFPD staff also feels that the Glade Reservoir will provide a strategic water source for future aerial firefighting efforts.
3. We also have concerns with the impact that rerouting of U.S. Hwy 287 will have on the intersection of U.S. Hwy 287 and W CR 72 also known as The Owl Canyon intersection. This intersection is also part of the Wellington Fire Protection District. We are requesting information on the estimated traffic flows at the intersection as this may have a direct impact on us as well.

My best,

Capt. Pettit
Deputy Fire Marshall