

Save Rural NoCo 12-minute Presentation (07-08-2020)

(Title Slide)

Good evening, my name is John Dettenwanger, I live north of Laporte in Bonner Peak, which is very close to the northern end of the proposed reservoir. I am also a landowner and tax payer in Larimer County.

(Communities slide)

I represent Save Rural NoCo, a group of concerned landowners, with over 200 members and supporters that live near the proposed reservoir. Save Rural NoCo's mission is to protect existing land uses in rural northern Colorado from harmful development.

Save Rural NoCo, jointly with No Pipe Dream and Save the Poudre, submitted a lengthy comment letter outlining the specific areas where the NISP proposal does not meet the county's 1041 permit issuance criteria, and my testimony today will focus on several of the key issues that are detailed on our comment letter.

(Images Slide)

Save Rural NoCo's members include scientist and business professionals with specific expertise that have helped to help analyze impacts of this project on rural communities. Therefore, our input, as was our comment letter, is based on considerable expertise and independent evaluation of the documentation provided by the applicant. And we find it seriously flawed.

Northern's 1041 application provides only fragments of the whole picture and actually states that their plans and designs have been developed at a conceptual level."

This is the opposite of the level of care that should be taken with a project this large impacting land, water, and communities and that has previously been required.

If the 1041 permit is issued, the horse leaves the barn for negative environmental impacts sprawling from Ted's Place to the county line and beyond, yet the application has only conceptually discloses to the public what those might look like or, conceptually, how environmental issues would be mitigated. Concepts alone cannot be accepted by the county, who are the front line for protecting its lands and citizens' quality of life. There's no way to go back once the infrastructure has been given the green light.

Let me now turn to specifics.

Criterion 10 imposes a burden on the applicant to prove that the "*benefits of the proposed development outweigh the losses of any natural resources*"

(Bulldozer Slide)

We are fully aware that the carrot for the county is the promise of flatwater recreation on Glade.

Larimer County is being ask by Northern Water to contribute over 1600 acres of productive agricultural land, destroy the rural scenic beauty of the Hook and Moore glade, negatively impact

the rural communities and their lifestyles, and significantly reduce water flows in the Poudre River that is an important economic asset for the county. This would be done for 12 communities outside of Larimer County.

And let's be clear, these impacts will be permanent, and irreversible.

And all this for what benefit? The County hopes for the promise of flatwater recreation and is considering trading the natural resources and community well-being to achieve this. These hopes are all based on the projections made by Northern Water that paint a rosy picture of a full reservoir and solid revenue stream from operations.

The water supply strategy described in the application is seriously flawed and fails to take into account recent history and evidence of increasingly drier climate. Our analysis shows that Glade would not provide the kind of recreation sought by flatwater lovers and would create a financial liability for the county.

During the first planning commission hearing, Northern Water claimed that the reservoir would provide "High Quality Recreation" 95% of the time, while in its written documents state that:

"over a variety of operating scenarios, Glade will provide a large, inviting surface area to recreate on nearly 75 percent of the time."

(Dry Lake Slide)

In fact, our analysis shows that over 50% of the time, water levels would be well below the bottom of the boat ramp. The banks would be a bathtub ring of dirt and mud.

Glade would receive water from a very junior water right, which may provide water in slightly more than 3 out of 10 years. The South Platte Water Exchange Project has not been successful, nor has Water Secure, so Northern is currently trying to work out where the water will come from.

County staff have included a recommended permit condition that would require *a legally binding agreement with the County addressing the Recreational Development Plan and the funding, operations management and maintenance of the facility.*

However, until and unless a sufficient water resource is identified and the impacts of developing that resource are disclosed to the public in accordance with federal and local laws, the public is being shut out. And frankly, this matters to us, and it should matter to the county.

The Planning Commission must understand that Glade would be nothing like Horsetooth!

Horsetooth is managed for recreation. It is filled every year with Colorado-Big Thompson water, and the end users typically receive only about 71% of the water they pay for. That allows the operator to keep the water in the reservoir for flat water recreation. Not so with Glade, which would have to send 40,000 ac-feet per year--100% of their commitments-- to cities mostly outside Larimer County.

The applicant's modeling stopped in 2005, and it shows that about 73% of the peak recreation season, Glade would offer good flatwater recreation. The obvious omission of the last 15 years of stream flow data should raise serious questions about their projections.

Our modeling picked up where they left off, and included the last 15 years of stream flows from the Poudre River, as shown on this graph.

(Water Storage Model Slide)

The light blue area represents the number of acre-feet needed for boat access, years are along the bottom. Any time the dark blue or red lines are below the light blue area, the water would be too low for boat access. What this indicates is that Glade would have insufficient water for flat water recreation about half the time and should more aptly be called W-A-D-E reservoir. Please note the last 2 decades on the right of the chart.

In the June 24 hearing, the applicant stated that boating would be possible 80-95% of the time, and that boating would be possible with only 40,000 acre-feet of water in the reservoir.

(Boat Dock Slide)

This figure shows that with only 40,000 acre-ft of water in the reservoir, the water level would be 122 vertical feet below the boat ramp. For example, hand launching from the northern access road would require you to carry your "watercraft" across 1.5 miles of the lake bed to reach the Reservoir's north shore. Of course, if you can't carry it back to your car, you can paddle to the

Reservoir's southern access and climb 122 vertical feet with your boat and shuttle back. While this may be "possible" from a recreational perspective, quite frankly, who would be willing to pay for this?

Similarly, this would not be an attractive open space for hikers and bikers and campers.

Finally, the applicant's projections do not include current and future prolonged drought, they do not include the steady march to a drier climate, and therefore, projections that the reservoir would be available for a desirable flat-water experience 75 - 95% of the time are at best, grossly overstated and unrealistic.

The applicant's claim that recreation would generate \$13 to 30MM for the county is not supported by any of the documentation associated with this permit. How could this project generate this revenue if Horsetooth took in only 2.5 MM in 2019?

When recreation is not realized, Larimer County's citizens bear the significant cost and environmental impacts, in perpetuity, and any benefits are accrued outside the county.

There is enough evidence in our modeling to suggest that the county should conduct its own independent risk analysis of water supply regarding recreation at Glade before it and its citizens get left holding the financial and environmental bag. That analysis needs to be conducted in a transparent manner and made public, so that the errors that have made it this far into the process are kept in check.

With regards to Criterion 4, the planning staff's document repeatedly refers to analysis conducted for the federal EIS as documentation that the issuance criteria have been met. The applicant frequently reminds us that the county was a cooperating agency on the EIS, hinting strongly that the EIS somehow stand in for the county's analysis. We emphatically point out that the federal EIS process is a separate and distinct process from the county's 1041 process, and the EIS is not a suitable tool for local scale land use decisions.

The county's land use code requires the county to protect its land, its natural resources, and the quality of life for its citizens. These are different goals, governed by different laws, and the federal EIS does not serve the Larimer County public well.

What we have found, as we delved into the FEIS, is that many of its analyses are misleading or just plain incorrect. The local communities are almost entirely overlooked, and the county must not allow this to continue.

It has taken us hundreds of hours to unravel how and why the EIS reaches some of its conclusions, and the planning commission must know that there are egregious flaws. And the real impacts to land, water and communities are not addressed.

I would like to close with a short discussion about Criterion 1, specifically that the application does not conform with the 2019 comprehensive plan.

The county clearly has a vision embodied in that Plan, a vision that recognizes the value of the natural resources in rural parts of the county and encourages conservation. It is not possible to answer "yes" to most if not all of the questions related to development in three affected Framework components when the project in question is a large industrial and commercial complex. It is clearly incompatible with the county's vision for this rural landscape.

People choose where they live based on a variety of reasons. Some people choose suburban or urban areas because of the proximity to amenities. Others choose a Rural setting and are willing to tradeoff these amenities for a rural lifestyle and its many benefits. The proposed Glade Reservoir and the rest of this ill-conceived project would be a major disruption to the land, water and communities and it would irreversibly spoil our rural ways of life.

We ask that the Planning Commission recommend denial this application on the grounds it does not meet many of the permit criteria, and lacks key analysis required for a full evaluation.

Thank you for your time.