



**Larimer County Analysis –
Comprehensive Plan
Supplement 1 to Technical
Memorandum No. 2
Larimer County 1041
Review Criteria**

Prepared for:
Larimer County

Prepared by:
**Northern Integrated Supply Project
Water Activity Enterprise**

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Supplement to Technical Memo No. 2

Comprehensive Plan

NISP: Larimer County 1041 Review Criteria (LUC Section 14.10(D))

The purpose of this Supplement to Technical Memo No. 2, Larimer County 1041 Review Criteria, is to add a discussion to Criterion 1 that demonstrates consistency with Larimer County's Comprehensive Plan, adopted July 2019.

Background

Beginning in 2017, technical memoranda were shared with staff at Larimer County's Planning Department to inform and collaborate with the County to ensure NISP is consistent with County planning documents, land use codes, building codes, and policies in advance of submitting the application for a 1041 permit. At that time, the County's general development plan was the 1997 Master Plan. In between 2017 and submittal of the NISP 1041 application in February 2020, Larimer County adopted a Comprehensive Plan on July 17, 2019.

The Comprehensive Plan is an advisory document, providing "policy guidance for future land development, public services, environmental protection, and to support future economic health to sustain the community." (*Comprehensive Plan at 3*). This updated plan replaces the 1997 Master Plan by building upon the policies, principles and guidance that fulfill the County's long-standing mission of "protection of the health, safety and welfare of the citizens." (*Comprehensive Plan at 6 and 103*). In fact, "many of the policies found in this Plan were carried forward from the 1997 Master Plan." (*Comprehensive Plan at 66*). Mainly, this updated plan incorporates additional departmental master plans and studies that were developed post 1997 (such as the Open Lands Master Plan and the Reservoir Parks Master Plan adopted in 2017) and distinguishes the landscape/community areas of mountains and the Front Range to apply geographic area-based principles to future development goals. The 1997 Master Plan "indicated only two distinct land use types: Urban and Rural." (*Comprehensive Plan at 48*). The Comprehensive Plan's distinction between mountain and Front Range communities is notably important to the County's citizens and stakeholders because the 1997 Master Plan was "out of touch with current conditions – especially in the mountains." However, this distinction does not affect NISP's consistency with the Comprehensive Plan and the fundamental principles carried over from the County's 1997 Master Plan, since "many of the principles of the 1997 Master Plan are foundational to this updated Comprehensive Plan." (*Comprehensive Plan, Appendix B at 13*). The majority of NISP's development within the County occurs within the urban and rural areas in the Front Range. The edge of Glade Reservoir is within Area 5 of the mountain area; however, the main recreation area for Glade Reservoir will be in the Front Range (east of existing Highway 287), and the pipelines will be almost all in the Front Range planning area.

Therefore, this memorandum supplements Technical Review Memo No. 2 by adding analysis under Criterion 1 as it applies to the pipeline siting and development, and the water storage reservoir

siting and construction. The County's "strengthened role as a leader in facilitation and collaboration" was important during the NEPA process, and its review of technical memoranda served to create consistency with County planning principles and goals and NISP. This effort embodies the Comprehensive Plan's principles of facilitated and proactive planning and engagement. *(See Comprehensive Plan at 30 and 31).*

A. Pipeline Siting and Development

Supplement to Review Criteria 1: The proposal is consistent with the master plan and applicable Intergovernmental agreements affecting land use and developments

c. Comprehensive Plan

i. Health

One of the “big issues” identified in chapter 1 of the Comprehensive Plan is the health of constituents. Specifically, “maintaining environmentally healthy landscapes and viability of local agriculture provides financially intangible yet essential health benefits.” (*Comprehensive Plan at 11*). The pipeline component of NISP involves coordination with landowners to revegetate lands affected by construction. The easement agreement with private landowners will compensate for land rights and crop losses resulting from the temporary disturbance to land, thereby maintaining both landscape and viability of agriculture.

ii. Watersheds and Natural Resources

A second “big issue” for the County that is adequately protected and enhanced by NISP is the “protection of important farmlands and wildlife habit[at]s and corridors.” (*Comprehensive Plan at 13*). Construction of a buried pipeline will not fragment landscapes, create land use conflicts, create disappearance of agricultural lands, nor create competition for water. NISP is a collaborative project in which the delivery of water is designed to allow flows through the Poudre River through the City of Fort Collins and will serve fifteen participants rather than a “competition for water” between single entities. The pipelines will not impact designated land uses.

iii. Environmental Stewardship

Construction of the NISP pipelines within the County will be consistent with the Comprehensive Plan’s theme of “environmental stewardship.” Mitigation for affected landowners (compensation for crop losses and revegetation) will restore the natural and agricultural areas. Responsible management of the construction activities through BMPs will protect air, soil, and vegetation. Such measures will also ensure that the existing land uses are unchanged.

iv. Economic Sustainability

By carrying flows in the Poudre River through the City of Fort Collins, the economic benefits from tourism and outdoor recreation will be preserved. Additionally, the temporary impacts of pipeline construction will not affect the economy. NISP is consistent with the theme of preserving and growing a diverse regional economy. The pipelines for NISP provide resiliency and redundancy for critical infrastructure, in line with the principles and policies for development of utilities. (*Comprehensive Plan at 42*). Utilizing pipelines for conveyance minimizes disruptions and failures in the lifeline service of delivering water.

v. Agricultural Lands Conservation and Stewardship

The Comprehensive Plan states that, "Larimer County promotes conservation of healthy, sustainable agricultural land and water resources by undertaking collaborative strategies to minimize the loss of productive land and water and continuing to pursue water sharing between agriculture, industrial and domestic utilities." (*Comprehensive Plan at 46*). In addition to compensating landowners affected by pipeline construction, NISP has incorporated a collaborative strategy referred to as WaterSecure that is designed to preserve agricultural lands and farming/ranching operations by providing reliable and secure water supplies to irrigation ditch companies. This private/public partnership leads to healthy and sustainable agricultural lands and is consistent with the County's principles and policies for facilitating "collaboration regarding water storage and supply and water sharing." (*Comprehensive Plan at 47*).

B. Water Storage Reservoir Siting and Construction

Supplement to Review Criteria 1: The proposal is consistent with the master plan and applicable Intergovernmental agreements affecting land use and developments

d. Comprehensive Plan

i. Health

One of the “big issues” identified in chapter 1 of the Comprehensive Plan is health of the County’s population. Specifically, “healthy and active lifestyles are an important component of the County’s livability.” (*Comprehensive Plan at 11*). To achieve the County’s goals in providing a greater amount of publicly accessible open natural areas, the County recognizes that “regional coordination is needed.” (*Id.*) In fact, Glade Reservoir will help the County achieve the Comprehensive Plan’s metric 3 – increase the number of publicly accessible trail miles to 150 miles by 2030. (*Comprehensive Plan at 69*). As a voluntary commitment for the purpose of enhancing the recreation opportunities at Glade Reservoir, NISP purchased the previously operated KOA campground adjacent to the lands described as the Glade Recreation Area (GRA). The KOA property comes with all of the attributes of a typical KOA including approximately 30 full hookup (water, sewer, electric) camp sites, an additional 30 partial service sites, several cabins, a camp store, a shower-restroom facility, a laundry, a pavilion, a pool, and a home. Approximately half of the 20 acres is presently developed, and half is undeveloped. The final use of any and all of these facilities as part of the GRA will be coordinated with Larimer County.

ii. Watersheds and Natural Resources

NISP will also help achieve metric 4 – “increasing the acres of conserved land through available tools.” (*Comprehensive Plan at 70*). Preservation of natural resources is a second “big issue” for the County, recognizing that “natural resource health is directly linked to conserved lands.” (*Comprehensive Plan at 13 and 70*). NISP will allow for public enjoyment and use of recreation at Glade Reservoir, which is “a core value to most residents and tourists.” (*Comprehensive Plan at 70*). The County identifies growth in the Front Range as a threat to preservation of open spaces when it fragments landscapes, creates land use conflicts, creates disappearance of agricultural lands and competition for water. (*Id.*) Although Glade Reservoir will convert some open lands to open waters, it will preserve the natural area, the landscape, and the wildlife habitat and natural vegetation on 1,400 acres within the County. Through measures committed under the State approved Fish and Wildlife Mitigation & Enhancement Plan, an Endangered Species Act plan for the Prebles Meadow Jumping Mouse, a Clean Water Act section 404 mitigation plan, and a historic preservation plan, NISP will protect important wildlife habitat corridors, native vegetation, maintain healthy and natural ecosystems, provide ecological services, resiliency and tax benefits and quality of life for the County’s residents.

NISP is consistent with the principles and policies for conservation, stewardship, and resiliency of natural resources, wildlife habitat and ecosystems. By designing infrastructure to avoid, minimize and mitigate environmental impacts, infrastructure and facilities are located and designed to have the least impacts to sensitive areas and cultural features. Through coordination with Colorado Parks and Wildlife, well-designed wildlife habitat conservation areas and a cold-water fishery meet principles of “broader landscape connectivity” and establish buffers for wildlife habitat and movement corridors. (See *Comprehensive Plan at 44*).

iii. Inclusive Opportunities

One of the themes (defined as “shared community values”) of the Comprehensive Plan is “inclusive opportunity.” Under this theme, the County identifies a goal “for residents to enjoy a high quality of life into the next 20 years.” (*Comprehensive Plan at 17*). One of the ways to achieve this goal is through NISP because Glade Reservoir will provide both recreation and conservation, which “bring significant, synergistic economic, health, and quality of life benefits.” (*Id.*). Opportunities for recreation at Glade Reservoir will be inclusive of the whole community in Larimer County, allowing for hiking, boating, biking, fishing, camping, and gathering spaces at the reservoir and at a visitor center.

iv. Environmental Stewardship

Commitments for mitigation and environmental enhancement that are an essential piece of NISP (through the various federal, state and local permits) will promote preservation of the natural resources found in the Front Range within Larimer County. For example, mitigation measures include protection of wetlands and habitat for the Prebles meadow jumping mouse. The rigorous review and analysis and permit conditions from federal, state and local resource agencies and departments, including the County’s Planning Department staff, have helped to ensure that NISP is suitable for the environmental characteristics at the site.

v. Economic Sustainability

NISP satisfies the theme of economic sustainability. The largest component of the project that is within the County (Glade Reservoir) will significantly contribute to the economy of the County, supporting tourism, recreation opportunities and recreation management by the County.

vi. Adequate Public Facilities and Services

The commitment to allow public use at Glade Reservoir is consistent with principles of collaboration and partnership under the Comprehensive Plan (*See Comprehensive Plan at 43*). The development of recreation at Glade Reservoir will foster a partnership with the County and will ensure NISP’s control over the facilities necessary for the water supply operations while working with the County to manage recreation at the site if it desires. This partnership will be established through a subsequent recreation management agreement between the parties. Similarly, NISP will

coordinate with local fire districts and the County sheriff to meet public safety and patrol needs. Development and maintenance of roads around Glade Reservoir will also be coordinated with the County and CDOT to ensure that designs meet County and State codes and guidelines.

vii. Rural Lands

Glade Reservoir's use of rural lands is consistent with the principle under the Comprehensive Plan that rural areas are meant to accomplish purposes that suit the natural environment. With the reservoir, the area will continue to accomplish what it is naturally suited for: "to protect watersheds and ecosystems; to support a regional watershed and energy resources; and to continue bolstering a high quality of rural living and outdoor recreation and tourism opportunities." (*Comprehensive Plan at 49*).

Conclusion

Larimer County's Comprehensive Plan recognizes that "opportunities for non-residential uses in *Mountains & Foothills, Agriculture & Ranching, Rural and Urban/Rural Interface* not identified on the Framework Map... should be considered when they demonstrate alignment" with applicable criteria. (*Comprehensive Plan at 49*). NISP is aligned with the following criteria identified in the Comprehensive Plan:

- Supports a demonstrable local need and is a regional project supporting fifteen participants
- Is in proximity and supports tourism, resort, institutional or outdoor recreational opportunities
- Is located based upon the access and transportation requirements of the type and intensity of activity being proposed (e.g. a rustic camp may be acceptable on a gravel road whereas an intense retail use should be located on a paved road)
- Is located where it can be demonstrated that adequate facilities (i.e. water, sewer, fire protection and the like) can be provided or acquired to ensure the health, safety and welfare of the public utilizing such uses
- Demonstrates that the scale and intensity of the use is in context with the surrounding area based upon factors such as character of place; proximity to residential areas; proximity to sensitive environmental features or wildlife areas; and proximity to unique or highly visible viewsheds, landforms, or places of interest