

Alternatives

Comments on the Northern Integrated Supply Project (NISP) 1041 Permit -

Follows 42 pages of comment provided to Larimer County Commissioners on 4.29.20 and 4 pages of additional comments provided on 7.30.20



Dr. Tom Sale
August 24, 2020



FINAL ENVIRONMENTAL IMPACT STATEMENT

NORTHERN INTEGRATED SUPPLY PROJECT

July 2018

Reviewed this document and the DEIS

Volume 1

Summary

Chapter 1.
Purpose and Need

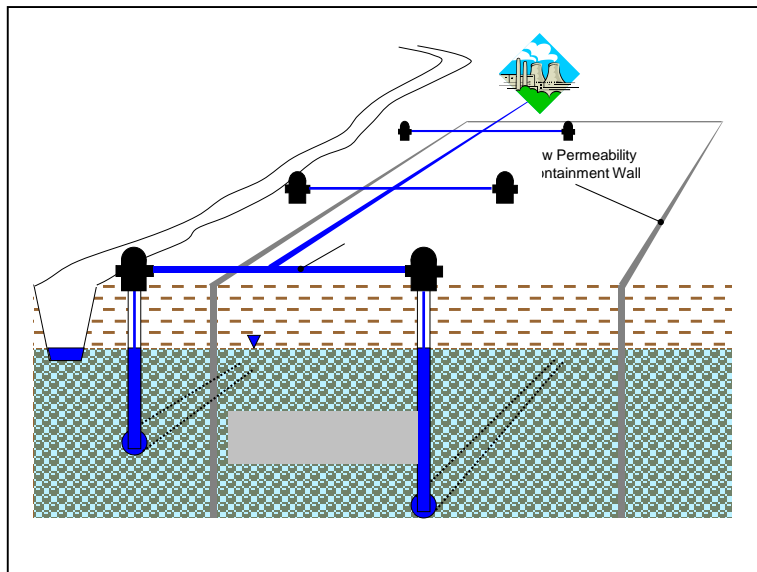
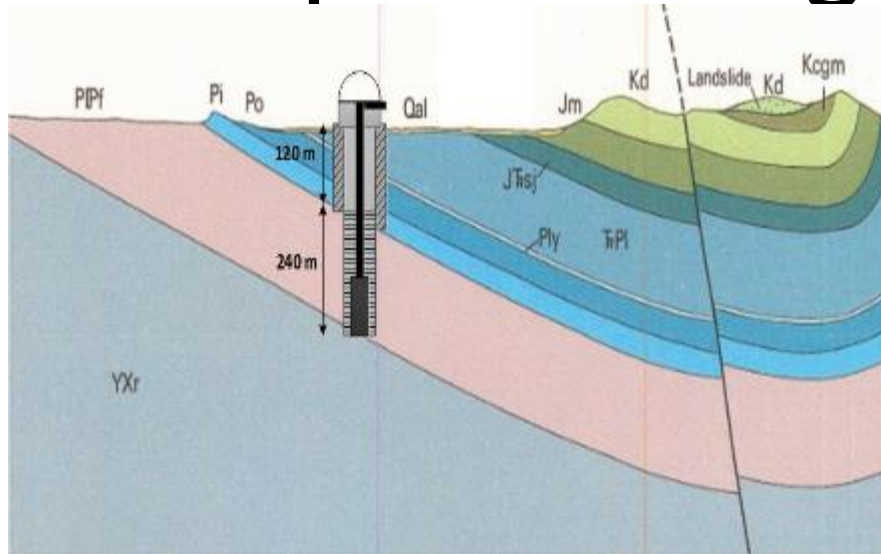
Chapter 2.
Alternatives

Chapter 3.
Affected Environment

Advances biased screening
of alternatives by people
who already knew what
they wanted...

PROOF

Aquifer Storage and Recovery (ASR)



- DEIS
 - Comments 2015
 - Errors and omissions
 - ASR design under glade
 - Response
 - Project Not in Denver Basin – FALSE
 - Failure to acknowledge design, errors, and/or omissions
- FEIS
 - Comments 2018
 - Again Errors and Omissions
 - New Information
- And all the while ASR has risen to the forefront

NEW Opportunities – Water from renewable energy- MISSED

Didn't exist 40 years ago

As Western Coal Plants Close, What Happens To Their Water?

By LUKF RUNYON - FEB 25, 2020

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Platte River to retire Rawhide Unit 1 by 2030

Posted on June 16, 2020

Closure will mark end to all coal-fired generation for utility

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Modernization of Agricultural Infrastructure - Missed

All the water Northern Colorado needs can be found via modernization of dated agricultural conveyances and storage

WATER REPORT FOR 2019			
	2019	2018	2017
NON CBT STORAGE			
Water Season Beginning Storage (April 2018)*	52,395	49,229*	25,661
Less Ending Storage (Oct. 31, 2019)	32,152	32,250	15,162
Storage Used	20,243	16,979	10,499
CBT PROJECTION INFORMATION			
Carryover Beginning of the Year	8,800	8,800	5,661
CBT Quota Percentage	70%	80%	80%
CBT Water Acre Feet	28,000	32,600	25,661
Less Ending Balance	17,071	10,580	15,162
CBT Water Acre Feet Used	10,929	22,020	10,499
DIVERSIONS			
Diversion from N. Fork Poudre	30,590	33,665	22,239
Diversion from Munroe Canal	16,040	27,634	44,955
Municipal Use from Horsetooth	9,114	8,675	8,815
Agricultural Use from Horsetooth (Exchange to Munroe)	14,091	14,240	13,880
Total Diversions*	69,835	84,214	89,889
DISTRIBUTION			
Deliveries to Ag Shareholders	25,464	23,832	25,946
Deliveries to Municipal Shareholders	9,114	8,669	8,815
Deliveries to Shareholders	34,578	32,501	34,761
OTHER DELIVERIES			
Reservoir #6 WSS	2,000	5,000	4,000
Fossil Creek Preferred	3,458	5,133	523
FCP CBT Trade	4,940	5,415	5,125
Rentals	0	0	0
Other Deliveries	10,398	15,548	9,648
TOTAL SOURCES			
Total Deliveries*	44,976	48,050	44,409
NFC Reservoir Use*	14,685	16,979	10,499
Other Deliveries	10,398	15,548	9,648
Total Diversions	69,835	84,214	89,889
Total Uses*	99,904	159,791	154,445
Net Shrink	39,272	29,206	34,681
Percentage Shrink	47%	30.01%	38.92%



The North Poudre Irrigation Company lost 39,000 acre ft in 2019

Criteria 2 – The applicant has presented reasonable siting and design alternatives or explained why no reasonable alternatives are available.

The applicant failed to objectively consider proven modern alternatives that are faster, lower cost, and far less harmful.

Recommend Denial of 1041 Based on Criteria 2

Criteria 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.

The proposal fails to adequately mitigate innumerable large-scale adverse impacts

Recommend Denial of 1041 Based on Criteria 4

See written comments

A Better Way

A Collaborative Review of Alternatives

- Format

- At CSU Lory Student Center
- Independent Chair
- Participants
 - By petition alternative advocates
 - Northern
 - Project Participants
 - Counties
 - ACOE
 - Press
 - Public as allowed
 - ...
- Equivalent time by alternatives and issues
- Nonbinding

- Documentation to support

- Project Participants
- Larimer County Commissioner

- Agenda

- Needs
 - Colorado Water Plan
 - Participants
 - Environmental
- Priorities
- Alternative Review
 - Presentation
 - Documentation

Support for a non-binding review of alternatives

Meeting Facilitators

- Governor Bill Ritter – Impartial Meeting Chair ... a remarkable record of success in bring people together for the betterment of all
- CSU Water Center Director - Reagan Waskom ... rally CSU and state resources
- Former Commissioner US Bureau of Reclamation - Daniel P. Beard ... add national perspectives

Host of Others...

How long?... under 12 months?

