



June 15, 2011

To: Chandler Peter, U.S. Army Corps of Engineers

Cc: Jim Martin, U.S. Environmental Protection Agency

From: Save the Poudre: Poudre Waterkeeper

Regarding: Request for economic analysis of flooding caused by NISP along Poudre River

Dear Mr. Peter,

In comments submitted to the Corps about the Northern Integrated Supply Project (NISP), the issue of flooding was raised by the City of Fort Collins and the City of Greeley. Because NISP – as it was described in the DEIS – would dramatically reduce the sustained peak flows in the Poudre River, channel sedimentation would increase over time, vegetation encroachment in the channel would increase over time, and the capacity of the channel to convey floodwater would decrease over time. Thus, NISP would increase flooding along the Poudre River especially during very high flow events including 100-year and 500-year floods.

The City of Greeley's NISP DEIS comments include:

NISP will reduce flows through the Greeley Upstream Reach even further, increasing sedimentation and vegetation encroachment and accelerating channel contraction. Fewer instances of high flow scour will also reduce opportunities for channel rejuvenation. Secondary effects caused by decreased flows may include increased bank erosion, increased size of in-channel islands, and flow obstruction and flooding. (<http://www.nwo.usace.army.mil/html/od-tl/eis/nisp.deis-comments.597-618.pdf>, page 10)

Further, as you know, the City of Greeley is already involved in very expensive flood mitigation issues with the Army Corps along the Poudre River. Those issues are summarized in this March 20, 2010 article from the *Greeley Tribune*: <http://www.greeleytribune.com/article/20100320/NEWS/100329993>. In a recent article in the *Greeley Tribune* (June 8, 2011: <http://www.greeleytribune.com/article/20110608/NEWS/706089946>), the City of Greeley also makes comments related to potential NISP-caused flooding:

Greeley water and sewer director Jon Monson said the Corps' draft Environmental Impact Statement didn't fully address the issue of peak flows.

“Flows are insufficient today because of the various ditches and other things impacting the river,” Monson said. “We’re getting silt built up today. That’s what we wanted the Corps to address.”

The City of Fort Collins’ comments inserted into the NISP DEIS are even more pointed with regards to the potential for NISP to cause flooding:

Channel contraction and vegetation encroachment from NISP would likely have significant adverse effects on base flood elevations (BFEs) and the resulting extent of flood inundations during large recurrence interval floods such as, the 100- and 500-year flood events. Reduced channel conveyance in the Poudre River would likely increase BFEs through the City. In turn, this would widen the limits of the floodplain and potentially add structures and properties into the floodplain and /or floodway that were not previously at risk of flooding. ... Flood risks could affect property values and business relocations, and, therefore, tax revenues. ... Unless addressed in the DEIS, subsequent costs of designing, constructing and maintaining additional flood protection facilities or modifying existing structures would be borne by the citizens of Fort Collins. Additional multi-million dollar investments may be necessary.”

(<http://www.fcgov.com/nispreview/pdf/nisp.pdf?20080917>, page 103-104)

The State of Colorado Water Quality Control Division also mentions this issue:

Reduced flow equals reduced channel forming flows, which leads to greater sedimentation, vegetation encroachment, channel constriction and deeper incision.

(<http://savethepoudre.org/docs/wqcd-nisp-letter-and-comments-9-12-08.pdf>, page 4)

The U.S. EPA also mentions this issue:

Reducing the magnitude and frequency of these flows can reduce the transport of sediments, leading to a shift towards finer grained bed sediments, reduced channel complexity and increased vegetation encroachment.

([http://savethepoudre.org/docs/epa\\_nisp\\_letter\\_to\\_colonel\\_press.pdf](http://savethepoudre.org/docs/epa_nisp_letter_to_colonel_press.pdf), page 4)

Both the City of Greeley and the City of Fort Collins request additional analyses regarding the impact of NISP-caused flooding. In addition to those analyses, Save the Poudre: Poudre Waterkeeper believes that the NISP Supplemental Draft Environmental Impact Statement (SDEIS) should include an economic analysis of the costs associated with NISP-caused flooding including:

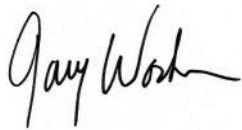
1. Property damage to private and public property
2. Potential loss of life
3. Increases in costs of emergency services associated with search and rescue
4. Clean-up costs
5. Decreases in business and personal income when a flood occurs or because new flood-prone properties may become undevelopable

6. Decreases in tax revenue to the cities, county, school districts, and state due to the damaged caused by flood events or due to new undevelopable property
7. Increases in the costs of flood-control projects including but not limited to dredging; vegetation removal; and the construction of channels, pits, ponds, and reservoirs to hold and control flood waters (Both Greeley and Fort Collins suggest such projects in their DEIS comments)
8. Increases in the costs of flood-proofing of public and private buildings, structures, and public infrastructure including roads and bridges.

The National Environmental Policy Act requires a full accounting of the costs associated with all alternatives proposed in the NISP analysis. We believe that an economic analysis that includes the eight items above is necessary in the SDEIS for NISP to comply with federal law.

Please contact me with any questions or concerns. Please acknowledge receipt of this letter.

Thank you,

A handwritten signature in black ink that reads "Gary Wockner". The signature is written in a cursive, flowing style.

Gary Wockner, PhD, Director  
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