

Part V - Recreation, Aesthetics, Socioeconomics & Cumulative Impacts

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1. General Comments

The proposed action will have negative impacts to the quality of life of Fort Collins residents. There will be impacts to the general economic health of the community and to aesthetic and recreation values. These quality of life indicators are strongly correlated with the biological condition of the Poudre River, its visual appearance, and its ability to support recreation activities. The millions of dollars invested by the City in reliance on the continued viability of the Poudre River evidence and illustrate the importance of the River in Fort Collins and to Fort Collins residents.

The great importance the City places on the Poudre River is reflected in several key planning documents. Overall guidance is provided by City Plan, the City's comprehensive plan, which states in the community vision: "The Poudre River will be a major part of a coordinated system of open lands that includes the foothills, corridors, streams and other water bodies, parks, natural areas and community separators." (City of Fort Collins City Plan at 10). City Plan further states, "The Poudre River Corridor is highlighted in *City Plan* because of its special significance to the entire Fort Collins community...The special significance of the Poudre River Corridor has been recognized in a series of planning documents adopted by the City Council over many years.." (City of Fort Collins City Plan at 229).

Some of the more recent plans that emphasize the importance of the Poudre River to the City include the Downtown River Corridor Implementation Program, Fort Collins Downtown Plan, the Downtown Strategic Plan, North College Avenue Corridor Plan, Natural Areas Policy Plan, Parks and Recreation Policy Plan, Framework for Environmental Action, and Stormwater Master Plan. Protection and enhancement of the River is a common theme in each of these planning documents. Flow reductions undermine these planning efforts by reducing wildlife, scenic and recreational values, as well as the efforts to revitalize areas in the vicinity of the River.

Finally, it is a policy of the City to coordinate with appropriate agencies, when possible, to provide adequate instream flows to maintain ecological, recreational, and scenic values in the Poudre River Corridor (Policy PRC-2.4 Instream Flows).

There are two types of flaws critical to the DEIS analyses of recreation, aesthetics, and socioeconomics. First, there are significant and unacceptable omissions in the analyses of these issues. For example, the assessment of community impacts fails to include the community of Fort Collins when it concludes there will be no community cohesion or quality of life impacts associated with any of the action alternatives (See Section V.3d that follows). Another example is the omission of the DEIS to identify the potential that impairment of water quality in the Poudre River that may result from the reduction in flows that NISP will cause could result in future "no body contact" and "no swimming" zones in the River. See comments regarding DEIS Section 4.5.9 in Section III...2a of these Comments. Such degradation of river conditions could severely impair or preclude

the continued use of the River for recreation. Without recognizing this concern, analyses of the impacts to boating and fishing and other forms of recreation are incomplete.

Second, there are numerous significant errors, inaccuracies and inconsistencies in the analysis and conclusions of the DEIS and supporting technical reports, as described in Parts III through V of these Comments. These errors and inconsistent conclusions about impacts to water quality and the ecology of the Poudre River throughout the DEIS undermine analyses of recreation and economic impacts. For example, the DEIS repeatedly makes contradictory conclusions about impacts to the riparian vegetation and wildlife. See Section IV.3b and Section IV.5c of these Comments. If, for example analyses of riparian vegetation and wildlife habitat are inconclusive throughout the DEIS, then dependant analysis and conclusions about the impact to recreational wildlife viewing is unsupported. Similarly, the limitations of these ecological analyses prevent a meaningful analysis of visual and aesthetic impacts, which depend upon a meaningful understanding of the impacts NISP would have on riparian vegetation and invasive species.

This theme of inconsistency is carried into the socioeconomic and recreational analyses. For example, DEIS Attachment G: Technical Memorandum- NISP Visual Impacts to Recreation Activities states:

“Reduced water flows in the river would decrease the area of riparian vegetation communities and surface water. Potential effects to visual quality from active and passive recreation areas in Lee Martinez City Park (Fort Collins) would be negligible. Although smaller in area, riparian plant communities would persist, and continue to screen the park from adjacent industrial and residential land uses. Effects to the long distance visibility of trees within the remaining riparian plant communities would also be negligible.... Although fewer in quantity, the same species of trees would remain at the same size and same locations as presently exist.”

This excerpt, which is based on little if any scientific evidence, makes no clear statement, is not consistent with other sections of the DEIS and does not support the assertion that impacts to wildlife viewing and aesthetics will be negligible (*See* Sections V.2b and V.3e that follow).

To summarize, because of the analytical problems found in the more readily measurable and quantifiable impacts described in Parts III and IV, rigorous identification of issues regarding the impacts NISP would have on Recreation, Socioeconomics and Aesthetics, meaningful analysis of those impacts, and consideration of ways in which those impacts may be addressed, is hindered and, to some extent, not possible. The Corps must evaluate and address the impacts of NISP on these areas of concern and fully address the expected impacts in accordance with the Section 404(b)(1) Guidelines. *See* Section II.1a of these Comments for further discussion in this regard. Additional identification and analysis of these impacts, building upon the additional work needed to address the

concerns noted throughout these Comments, must be completed and incorporated into an SDEIS and Revised Section 404(b)(1) Analysis.

1a. Impact of the Proposed Action on Fort Collins' Economy

The City of Fort Collins has built substantial infrastructure along the Poudre River and based substantial investments upon the location and character of the Poudre River as it flows through Fort Collins. This may result in part from the fact that the Poudre River flows through the original center of the City. These investments and infrastructure improvements range from the design and construction of multi-million dollar wastewater treatment plants, to the acquisition of parks, Natural Areas and trail alignments along the River, to the completion of Downtown land use and infrastructure plans to complement and encourage interaction with the nearby reaches of the River.

Below is a table depicting selected projects, acquisitions and investments of the City of Fort Collins in and around the Poudre River, along with the general timeframe for the expenditures. This table illustrates the extent to which the River has been central to City programs and priorities.

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Summary of Selected City Investments and Acquisitions Along the Poudre River

Poudre River Projects	Year	Cost
Natural Areas Acquisitions (see page 94 for detail)	1955 – present	\$8.4 million
Natural Areas Restoration and Rehabilitation	2003 -- present	\$500,000
Park Acquisitions (see page 193 for detail)	1960 - present	\$14.6 million (present day values)
Poudre River Trail (see page 193 for detail)	1980 – present	\$8.3 million
Drake Water Reclamation Facility Levee	1992	\$462,000
Pickle Factory Site Purchase & Improvements	1995	\$290,000
Stormwater Land Acquisitions	2001 – present	\$360,000
Old Fort Site Historic Survey Project	2002	\$35,000
Poudre River Enhancement Project	2003	\$120,000
Bicycle/Pedestrian Bridge over Poudre River	2002	\$998,007
Timberline R-Path Levee	2000	\$50,000
Downtown River Corridor Preliminary Brownfields Pilot Assessment Project	1999	\$250,000
Targeted Brownfields Assessment – Poudre River	2004	\$80,000
North College Improvements – Phase I	2005	approximately \$5 million
Oxbow Levee	2005	\$700,000
Northside Aztlan Community Center Construction	2007	\$10 million
Timberline L-Path Levee	2007	\$1.5 million
Downtown River District Infrastructure Project	2008/ in progress	\$200,000 for planning \$3 million (\$1.5 million in federal funds, and \$1.5 million in Downtown Development Authority funds) Estimated costs of full implementation is \$17.5 million
Museum/Discovery Science Center	in progress	\$363,000 for land (partial) \$9.6 million (\$6.6 million in dedicated City tax revenues and \$3 million in private foundation funds) for development

As noted above, the Downtown River Corridor – the area directly adjacent to both sides of the River between North College Avenue and Lemay Avenue – is the focus of the City’s revitalization efforts. As a result, there have been considerable investments made by the private sector and other entities along the River Corridor, in addition to the City’s

investments. The attractiveness of the River to housing, office and recreational uses has been a key factor in these investments. A few recent projects include:

- In-Situ, a 30,000 square foot office building along the Poudre River off of Lincoln Avenue. In-Situ located in Fort Collins in part to be near the Poudre River.
- Rooftops on the River, a housing project under construction near the Poudre River off of Willow Street.
- Mason Street North, a mixed use project located near the Poudre River off of Mason Street.
- Old Town Athletic Club, a project that renovated an older building on Linden Street.
- Colorado State University's Environmental Learning Center at Drake Road.
- Colorado State University's Engine and Energy Conversion Laboratory at the Old Power Plant Site along the Poudre River off of North College Avenue.

Many other private projects have been proposed for the Downtown River Corridor. Changes to the morphology, vegetation, and aesthetics due to reduced river flows may have an adverse impact on the attractiveness of the River Corridor for private investment.

In Fall 2007, Dr. John Loomis of Colorado State University conducted a scientific, peer-reviewed survey of Fort Collins households to determine the economic benefit (non-market valuation) of maintaining peak flows in the Poudre River through Fort Collins. See *"Estimating the Economic Benefits of Maintaining Peak Instream Flows in the Poudre River through Fort Collins, Colorado"* (the "Loomis Report") (Loomis, 2007).

As described in the Loomis Report, a mailed survey questioned a random sample of 550 Fort Collins households (with an impressive response rate of 64%) found that slightly more than two-thirds (66%) of the respondents thought a 50% reduction in flows was a very bad change with an additional 15% believing it would be a bad change. Thus, more than 80% of the households surveyed believe a 50% reduction in flows is a bad change. A 50% reduction in flows is within the range of reductions from NISP predicted for Fort Collins.

The Loomis Report notes that the same survey also found that three-fourths (75%) of Fort Collins households surveyed have visited the Poudre River in town at least once, and more than half do so every year, with a median of 6 trips per person. Using a federally accepted Contingent Valuation Method, the median value of \$15 per visit per survey respondent was estimated. Given the six trips per person per year with a value of \$15 per visit, this translates to an annual recreation value of \$90 per year per household. When median and mean willingness to pay results are generalized to the percentage of households in Fort Collins that responded to the survey, the analysis yields an annual benefit of \$8.5 million to \$12.7 million with a present worth or value of these benefits in perpetuity estimated at \$283 to \$424 million. These impacts must be considered in the Corps' public interest review required by 33 C.F.R. § 320.4(a). It is consistent with the

contingent valuation studies frequently used to estimate the effects of federal actions in the benefit-cost context.

The Socioeconomic analysis in the DEIS is also profoundly deficient in its lack of assessment of the impacts that NISP will have on the economy of the City. The Cache la Poudre River and its attendant natural environment, recreational amenities and aesthetics are critical to the economic health – present and future – of the City.

Surveys and studies conducted for the City have shown that the River and its amenities are central components to the high quality of life in the City, which, in turn, is essential to the economic development of the City. *See e.g., City of Fort Collins Communication and Public Information Office, Brand Report Summary* (the “Brand Report”) (available at http://fcgov.com/business/pdf/brand_summary_cpio.pdf). High quality of life is an integral part of retaining and attracting the high-skill, high-education and creative workers that are essential to the high-technology, biotech, brewing and other jobs that drive the local economy. *Id.*

The River has made the City extremely competitive in attracting highly desirable workers and businesses. *Id.* Indeed, the City regularly wins awards and recognitions nationally for its recreation and quality of life due in large part to the recreational and environmental qualities of the River. The City has recently won awards as the “Best Place to Live” from *Money Magazine*, “One of America’s Most Walkable Small Cities” from *MSN.com*, one of the “Best Places to Live” from *Men’s Journal*, “One of 18 Perfect Towns” and “One of America’s Dream Towns” from *Outside Magazine*, “Bicycle Friendly Community” from the League of American Bicyclists and “Top Retirement Spot” from *Where to Retire Magazine*. *See Why Fort Collins? Quality of Life* (available at <http://www.fcgov.com/business/qol.php>).

City residents identify the natural beauty of the River, the mountains and parks as the greatest asset of the City. *Id.* State tourism and economic development officials, along with industry experts, highlight the City’s outdoor recreation opportunities, clean water and hiking/biking trails as essential parts of the City’s “brand” and economic development. Brand Report at 2-4. “Fort Collins possesses incomparable brainpower, an excellent education system, a desirable quality of life and vast open space – all important factors when competing for and retaining those companies and jobs that will ensure a diverse and prosperous economy.” *Id.* at 10. The outdoors and open space are identified as among a handful of “key economic drivers” for the City. *Id.* at 11, 13. The economic development benefits spin off to all of Northern Colorado, which shares in the City’s economic success.

As an example of the importance of the River to the City’s economy, City economic development promotional material highlights the River, City Parks, City Natural Areas and bike paths as essential elements of the quality of life that attracts businesses and high-value workers. *See “The Fort Collins Way of Life”* (available at

http://www.fcgov.com/business/pdf/FortCollins_QualityofLife.pdf). It highlights photographs of a fly fisherman with a significant stream flow and healthy vegetation. *Id.*

City economic redevelopment and land use plans also revolve around a healthy River. For example, the City's River District plan is based on the connection of the City and its built environment with "recreation on the river and preserved natural areas." City of Fort Collins, River District Plan at 2 (available at http://fcgov.com/riverdistrict/pdf/river_district.pdf).

All of these efforts will be substantially impaired by the impacts of NISP on the River. As discussed in Parts III through V of these Comments, the reduction of Poudre flows by 25 % to 71 % would lead to potential algal blooms, fish kills, losses of native vegetation, choking of the stream channel, impairment of fishing and boating, potential losses of birds and other species, and the aesthetics of the River Corridor. These impacts are completely at odds with the City's and region's economic future. The Loomis Report confirms that residents already perceive the degradation to quality of life and recreation that a large reduction in flow will cause.

1b. Impact of the Proposed Action on Recreation

As reported in the Loomis Report (2007), survey respondents were asked how their visits to the Poudre River in Fort Collins would change if peak spring and summer flows were reduced by half. About one-third would visit less with the lower flows, 5 percent would stop visiting altogether, and about half would not change their visits (the remainder currently do not visit the River and the lower flows would not change that). Combining all the responses yields an average reduction of 3.2 visits per person, with a median reduction of 2 fewer visits per person with a 50 percent reduction in flow. Given the reported current median visits is 6 trips per person per year, this is a substantial decrease (-33%) in the median number of visits made to the Poudre River if flows were cut in half. Given the economic value of \$15 per visit, average annual recreation losses are between \$30 and \$48 per Fort Collins household and represent a loss of approximately \$1.3 million in recreation-related economic activity on an annual basis.

As described in more detail in Section V.2 of these Comments, it is anticipated that reduced flows associated with the proposed action are likely to reduce or eliminate boating and fishing opportunities in the Poudre River during the high recreation spring and summer months. Similarly, modification of the river channel as a result of reduced flows including habitat "terrestrialization" and the loss of native riparian wildlife will reduce opportunities for wildlife viewing that have been enjoyed in Fort Collins for more than half a century. Assuming that the proposed action were to be approved, over a period of time the River Corridor may visually appear more like a "canal" than a river, which would be expected to reduce visitor enjoyment and usage.

**City of Fort Collins NISP DEIS Comments
September 10, 2008**

Property	Site Acres	Present Day Value	Acq. Year	Management Purpose	Miles of Trail	Recreational Uses
Lee Martinez Park	89.56	\$ 11,866,700	1973	Active and passive recreation	0.6	Organized sports (ballfield and turf field sports), tennis, basketball, playground and picnic shelter users, walking, jogging, wildlife viewing, biking, equestrian, dogs, fishing, boating, Poudre River Trail through the park, community gatherings
Legacy Park	8.4	\$ 1,050,000	1975	Active and passive recreation	0.2	Walking, jogging, turf for informal play, picnic shelter, wildlife viewing, biking, equestrian, dogs, Hickory Trail through the park, community gatherings
Old Fort Collins Heritage Park	13.0	\$ 812,500	1960	Active and passive recreation	0.1	Organized sports (turf field sports) walking, wildlife viewing, biking, playground, dogs, fishing, boating, Poudre River Trail through park, community gatherings
Buckingham Park	5.75	\$891,250	1962	Active and passive recreation	0.1	Organized sports (ballfield and turf field sports), basketball, walking, playground and picnic shelter users, wildlife viewing, Poudre River Trail through the park, community gatherings
Poudre River Trail		\$ 8,334,750	1980-present	Active and passive trail recreation	10.10	Walking, jogging, biking, wildlife viewing, organized community walks and runs
Totals	116.71	\$ 22,955,200			11.1	

Above is a table illustrating the four public parks and the Poudre River Trail that are managed by the City of Fort Collins' Parks Department and affected by the proposed action. The existing water craft course improvements at the Old Power Plant will have a reduced challenge rating and shortened boating season due to the proposed action. The new water craft course that is currently in the development stage will likely be rendered not feasible due to the reduced flows and shortened boating season.

1c. Concluding General Comments

In summary, the Loomis Report indicates a substantial economic and recreation value to Fort Collins households in maintaining current peak spring and summer flows in the Poudre River. It appears the value of these instream flows to Fort Collins residents is of significant magnitude even relative to the market value of the water. Further, the value of water in the Poudre River to the residents of Fort Collins is sufficiently high to suggest that additional water diversions from the Poudre River should occur downstream of Fort Collins even if this involves higher costs to diverters or reduced water yields to diverters.

Finally, these non-market values are part of the Corps' National Economic Development assessment of benefits and costs and must be factored into the Corps' decision on whether or not to permit the proposed action and the mitigating measures that would be included in an approved permit.

Under the Section 404 regulations promulgated by the Corps, the Corps may not issue a permit for NISP if it determines that doing so would be contrary to the public interest based on a "careful weighing" of the probable impacts of the project. 33 C.F.R. § 320.4(a). As has been discussed throughout these comments, the current record is inadequate for the Corps to undertake this analysis, because it fails to account for the economic and noneconomic negative impacts of NISP, while possibly exaggerating the benefits.

The more careful consideration of the public interest required by the Corps' own regulations would show that this project as currently configured is not in the public interest. Adding to the public interest balance the hundreds of millions of dollars of costs the project as configured could cause due to new drinking water treatment infrastructure and operating costs/impacts (*see* Section III.1 of these Comments), needed wastewater treatment infrastructure and operating costs (*see* Section III.2), the loss of stormwater conveyance capacity (*see* Section IV.2), lost recreation from fishing, boating and other uses (*see* Section V.2), the costs associated with impacts such as lost existence value, lost economic development, ecological damage and degraded habitat values would tip the balance towards finding that this project is not in the public interest under Section 320.4(a). Adding these hundreds of millions of dollars of costs to the rate base for NISP participants and realistically considering the effects of climate on reduced yield may lead even consumers of water from NISP to conclude that the project is not in their interest either. *See* Section IV.6 of these Comments.

2. Recreation

2a. General Comments

The Cache la Poudre River Corridor in Fort Collins provides extensive riparian, riverine, and wetlands habitat and recreation opportunities. The City owns 19 Natural Areas comprising 1,423 acres, 4 parks, and over 27 miles of trail associated with the River *See* Table in Section V.1b of

these Comments. Surveys have shown that there are over 500,000 visits annually to the Natural Areas alone (City of Fort Collins, 2006). The City has invested over \$8 million in its Natural Areas and associated trails along the River (not adjusted for inflation) and over \$22 million in parks and trails (current value).

Both the DEIS and the Recreation Resources Technical Report acknowledge impacts from the proposed action on the aesthetics, fishing, boating and economics of the Poudre River through Fort Collins. The proposed action reduces flows in the River and contributes to the “miniaturization” of the River. Reduced flows result in less environmental diversity along the River and consequently a reduction in the recreation resource value to the community. An SDEIS and Revised 404(b)(1) Analysis should be prepared to contain the appropriate and legally required level of analysis, detail and avoidance, minimization or mitigation strategies to address recreational impacts from the proposed action.

The City has invested significant resources in improving the River and creating adjacent infrastructure for the enjoyment of the community. A Cache la Poudre River with sustained flows remains the “heart of the community” and is particularly vital to the continued growth of the downtown area. The proposed action will diminish the health of the River and its recreation value.

2b. Specific Comments on DEIS

Section 2.4.1.4 Sources of Water for Drought Conditions, page 2-32

Statement: *“NISP will have the option of entering into contracts with agricultural water users to lease water that can be subsequently diverted and stored in NISP facilities.”*

Comment: The City currently irrigates numerous parks with irrigation ditch water and the impact on these deliveries of water leased by NISP is not addressed. NISP leases and diversion of water from irrigation ditches that supply water to the City’s park system may affect the City’s ability to convey water to the park system. For example, it may affect the amount and timing of water that is available for use at City parks. Additional analyses related to these potential leases are needed to determine what impacts to the City will result. These concerns are in addition to the potential impacts identified above in Part III of these Comments regarding DEIS Section 2.4.1.4.

Table 4-1. Effects Common to All Action Alternatives, page 4-4

Statement: Recreation Effect: *“Poudre River streamflows downstream from the Poudre Valley Canal diversion would be reduced. This would potentially affect boating recreation on the Poudre River from Shields Street to Prospect Street in Fort Collins.”*

Comment: The statement should acknowledge the potential effect to river aesthetics, planned City improvements, other recreational experiences, and the economic value of the River to the

community in addition to boating. The impact should be quantified and more precisely defined in an SDEIS.

Section 4.2.1.7.1 Socioeconomics, Poudre River Recreation, page 4-4-11

Statement: *“Reductions in flow may also adversely impact recreation activities on the Poudre River trail, resulting from a reduction in the aesthetic quality of the recreation experience.”*

Comment: The City agrees that reduced flows in the Poudre River through Fort Collins will adversely impact recreation along the River. In fact, the City contracted a scientific, peer-reviewed study with Dr. John Loomis of Colorado State University (the Loomis Report, as described above) to determine the economic benefit (non-market valuation) of maintaining peak flows in the Cache la Poudre River through Fort Collins.

It is important to note that this survey asked citizens about a 50% reduction in peak spring and summer flows. It is noteworthy that some of the modeling detailed in the DEIS suggest up to a 71% reduction in flows during the same periods. One would logically conclude that had the survey asked about a 71% reduction, there would be a corresponding increase in adverse responses.

The aesthetic value of the River includes the recreation experience people have being adjacent to or on the River. Reduced flows will result in a diminished experience for fishermen if the River has fewer and less desirable fish, experiences fish kills and has a less diverse vegetative habitat that could compromise the aquatic community. Park and trail users will also be impacted by the potential for the composition of the River to present fewer and reduced eddies and ripples during reduced flows with resulting loss of enjoyment. Bird watching, for example, could be impacted if the cottonwood tree population or other bird habitat is diminished due to reduced flows or reduced flooding. Boating users could experience frustration with low flows in the River, a reduced channel width and the floatability of the River. The result would be fewer fishermen, boaters and in general fewer people coming to the River for recreational purposes.

Section 4.2.1.7, Socioeconomics, Page 4-11

Statement: *“Since aesthetic impacts are anticipated to be negligible, economic impacts are uncertain, but are expected to be similarly negligible.”*

Comment: This conclusion is not supported by data or factual findings in the DEIS or supporting documents. It runs contrary to the findings of the Loomis Report. The Loomis Report (see attachment to these comments) indicates a high value to the community for maintaining current river flows. The DEIS finding that “aesthetic impacts are anticipated to be negligible” ignores the further reduction in human and natural value of the River likely to result directly and indirectly from decreased flows. Reduced flows could jeopardize the survival of native fish, and changes to river flow and water quality could result in fish kills and a less diverse plant environment and resulting loss in wildlife species diversity. The human experience of the River will be diminished with this overall reduction in aesthetic richness.

Comparison of Alternatives (Table 4-6) and Distinguishing Effects of the Alternatives, Page 4-16

Statement: *“If Glade is managed for public recreation, it would provide a new sport fishery.”*

Comment: This section of the chart should reference the potential for negative impacts to fishing through Fort Collins in order to provide a comprehensive overview of the impacts to fishing.

Section 4.17.3.1 Poudre River Recreation, Page 4-72

Statement: *“A water craft course is currently being planned for this location and has a preliminary minimum design streamflow of 150 cfs.”*

And;

Section 4.22.2 Impacts Common to Action Alternatives, Page 4-102

Statement: *“Currently, the feature of the course will be designed to function at flows as low as 150 cubic feet per second (cfs).”*

Comment: Recent research by the consultant hired to design the water craft course, indicates that a minimum flow of 250 cfs is a realistic value for a viable course, with the desired flows to range up to over 500 cfs. McLaughlin Whitewater Design group, 2008. Additional analysis is needed in an SDEIS to determine the magnitude of the impact reduced flows from NISP would have on the water craft course. Flow reductions of the magnitude anticipated from NISP likely render the proposed water craft course impracticable or of very little usefulness, depending upon the timing and extent of reduction of river flows in this location. If the number of days that flows of sufficient volume are available is significantly reduced, the course would get little use, would have little economic impact, and would not be worth building. *Id.* This must be addressed in an SDEIS and Revised 404(b)(1) Analysis.

Section 4.17.3.1 Poudre River Recreation, pages 4-72-73

Statement: *“Fishing along this reach of the Poudre and in several of its associated ponds is growing in popularity and may be affected by streamflow changes that affect fish population and pond water levels.”*

Comment: Additional analysis is needed to determine the real magnitude of the impact on fishing through Fort Collins on the River and adjacent ponds. As indicated in the City’s comments on the aquatic resources sections of the EIS, the impacts to aquatic resources should be characterized as major given the significant changes to the flow regime and concomitant changes in channel morphology, habitat composition, etc. The DEIS does not sufficiently describe or quantify impacts to recreational fishing

Section 4.17.3.1 Poudre River Recreation, page 4-73

Statement: *“Use of the Poudre River trail and nature observation are not expected to have more than minor impacts due to any diminished aesthetic qualities.”*

Comment: This conclusion is not supported by any rigorous analysis and is contrary to the findings from the Loomis Report. The Report indicates that the community has a high value for maintaining current river flows. The diminished plant, aquatic and wildlife environment of the River resulting from the impacts to the River itself, will result in fewer people coming to enjoy the River. Activities such as bird watching, photography of nature, school outings to learn about nature, and other recreational opportunities have the potential to be reduced, resulting in less human experience and interaction with the river environment. The river environment of the Poudre River is largely “aesthetic” for many Fort Collins residents and reduced flows will impact this community value, particularly during the periods of lowest river flows.

Section 4.17.6 Mitigation, page 4-75

Statement: *“The District would seek an agreement with the Lake Canal Company to move diversions from the Lake Canal intake on the Poudre River near College Avenue to the Timnath Reservoir Inlet Canal about 3 miles downstream. On average, moving the diversions from the Lake Canal downstream will add about 50 cfs to the Poudre River for 6 weeks from late May to early July.”*

Comment: It is unlikely that a successful effort by the District to move the Lake Canal intake would be helpful to the viability of the water craft course. The DEIS includes no analysis of the impacts from the significant flow reductions to result from NISP, no discussion of avoidance or minimization of reduced flows, no definite commitment, no enforceable mitigation measure and thus no effective, acceptable mitigation of this impact. The aspiration expressed in this statement is not effective. Moreover, analysis of the effect of retaining 50 cfs for six weeks through a portion of the City is needed to determine the extent to which detrimental impacts from flow reductions would be avoided. An increase in flows of 50 cfs to offset the reductions projected to result from NISP is not likely to be sufficient to result in a viable water craft course, and clearly would not allow for strong regional draw anticipated from current peak flow levels. McLaughlin Whitewater Design group, 2008.

Table 4-20, Summary of Estimated Effects for the Alternatives, Chart, No. 15, Recreation Resources, Boating (kayaking and canoeing), page 4-132

Statement: *“Tubing on the Poudre River would be unaffected by reduced flows.”*

Comment: This conclusion is not supported by any analysis in this section. Tubing activities have become extremely popular in the last several years through Fort Collins with many hundreds, and probably thousands, of users annually (there is no data set available). The reduced flows associated with NISP will almost certainly reduce the recreation season for in-town tubers and this effect (and similar effects to canoers, rafters, and kayakers) should be quantified in an SDEIS .

Chapter 4, Table 4-20, Summary of Estimated Effects for the Alternatives, Chart, No. 15, Recreational value, page 4-145

Statement: *“Offsetting impacts. Approximately \$0.30 to \$1 million in annual loss from Poudre River activities. Approximately \$17 million in benefit from recreation at Glade Reservoir.”*

Comment: The analysis of impacts of NISP on recreational values on the Poudre River is not based upon adequate data. As noted below, the Recreation Resources Technical Report (p. 19) notes that no recreation/user data was developed as the basis for evaluation of recreation impacts.

Further, the cited passage implies that potential Glade recreation values will offset lost recreation values on the Poudre River in Fort Collins. The City does not agree with this implication. First, the Loomis Report (attached to these comments) indicates a high value to the community for maintaining current river flows. Further, this implication is not supportable because the offset in recreation is not in-kind. River kayaking and fly-fishing would be replaced by flatwater boating and fishing. Additionally, recreation opportunities several miles outside of Fort Collins at Glade would not offset recreation along the Poudre River in the central downtown of Fort Collins, or inside Fort Collins generally.

Even if recreational opportunities at Glade Reservoir could adequately substitute for recreational opportunities along the Poudre River in the center of Fort Collins, the supporting basis for the estimated benefits from the Glade recreation is flawed. As described in the Socio-economic Resources Technical Report, the \$17 million estimate is based on the assumption that Glade would experience an equivalent amount of recreation as Horsetooth Reservoir, but that there would be no reduction in recreation at Horsetooth. This key assumption is not supported by any data or analysis. In addition, the development of recreational facilities at Glade would be dependent upon the investment of funds, likely public funds, at a time of increasing scarcity of public and private resources. Without any commitment or demonstration that such investment will be forthcoming, the Corps cannot reasonably expect these \$17 million in benefits.

Table 4-20, Summary of Estimated Effects for the Alternatives Chart, No. 15, Recreation Resources (Page 4-15)

Statement: *“Additional cumulative impacts to recreational value may occur.”*

Comment: These additional cumulative impacts are not adequately addressed and may result in the reduction or elimination of existing recreational uses. Additional information is needed for the City to respond.

2c. Comments on Recreation Resources Technical Report (RRTR)

RRTR Section: 3.3., Assumptions, page 19

Statement: *“This report is based on existing information and no formal recreation/user surveys were conducted. Impacts were quantified to the extent possible based on available information; however, in most instances impacts to recreation were qualitative because of the limited amount of recreation user preference data necessary to derive a relationship between surface water elevation and visitor use at reservoirs, and streamflows and visitor use on rivers.”*

Comment: The analysis of potential impacts to recreation is hindered by the lack of data and therefore lack of basis for the conclusions reached. The conclusion that impacts to recreation

from NISP would be minor is derived from dubious assumptions only, and is merely speculative. This must be addressed in an SDEIS and Revised 404(b)(1) Analysis.

RRTR Section: 5.1.5., At the LINGGAGE, page 46

Statement: *“Although species diversity and abundance of riparian-dependent wildlife species could be reduced in localized areas, no major changes of species composition or distribution are likely (ERO 2007c). Therefore, no impacts to wildlife-related recreation are expected.”*

Comment: The finding of no major impact to riparian dependent wildlife is incorrect and unsupported by the DEIS (see previous comments on the Wildlife Technical Report (WRT)). Therefore, any finding about recreation that is based on the WRT, or other related portions of the DEIS, is similarly flawed. This must be addressed in an SDEIS and Revised 404(b)(1) Analysis.

RRTR Section: 5.1.5., At the LINGGAGE, page 46

Statement: *“Because the highest use of these public recreation areas and the trail occurs during summer, these visual effects to park visitors and trail users would be partially screened by the native deciduous vegetation being in full leaf (Holdeman 2007).”*

Comment: The cited statement is not supported by data or analysis and is speculative. It is also inconsistent with the likely impacts to vegetation, discussed in Section IV.3 of these Comments, that are likely to result from NISP. A partial screening by native vegetation would not likely avoid or substantially reduce the visual impacts, and would have little to no effect during a large part of the year. Indeed, the Loomis Report confirms that residents - - well acquainted with the River - - believe that there would be impacts associated with large reductions in flows. Additional information is required for analysis and meaningful consideration of aesthetic impacts. A visual representation of historic and anticipated flows in the River should be provided to show the aesthetic impact caused by reduced flows. The impacts of reduced flows upon vegetation along the River, and the cumulative impacts on aesthetics should be analyzed and considered. The condition of the River in dry years should be given special attention due to anticipated climate changes.

RRTR Section: 6.1, Mitigation Common to All Action Alternatives, page 75

Statement: *“Relocate the Lake Canal to a more downstream location to mitigate for loss of flow at the proposed Water Craft Course location, but also for the in-town (Shields Street to Prospect Road) canoeing reach. Coordinate with local boating community to relocate this point of diversion to the Timnath Reservoir inlet site to avoid impacts to boating and boating potential.”*

Comment: It is unlikely the effort by the District to move the Lake Canal intake would be helpful to the viability of the water craft course. This amount would not likely be sufficient to result in a viable water craft course, and clearly would not allow for strong regional draw anticipated from current peak flow levels. McLaughlin Whitewater Design group, 2008. Analysis of the effect of retaining 50 cfs for six weeks through a portion of the City is needed to determine the extent to which detrimental impacts from flow reductions would be avoided,

reduced or mitigated. Importantly, there is no guarantee that this relocation and coordination can and will occur and provide effective mitigation.

RRTR Section: 6.1, Mitigation Common to All Action Alternatives, page 75

Statement: *“See Vegetation and Stream Morphology Reports for mitigation of any aesthetic impacts along the river corridor.”*

Comment: Additional information is necessary for analysis and meaningful evaluation of aesthetic impacts, and related avoidance, reduction or mitigation. A visual representation of historic and anticipated flows in the River should be provided to show the aesthetic impact caused by reduced flows. The impacts of reduced flows upon vegetation along the River, and the cumulative impacts on aesthetics should be analyzed and considered. The condition of the River in dry years should be given special attention due to anticipated climate changes. *See* Section IV.6 of these Comments.

3. Socioeconomics & Aesthetics

3a. General Comments

1. The DEIS fails to provide a detailed, data-driven assessment of the impacts to visual resources and aesthetics along the Poudre River Corridor.
2. The DEIS focuses solely on socioeconomic impacts associated with recreation and confines its review to communities participating in the project. An SDEIS should comprehensively evaluate the socioeconomic impacts (by examining more than recreation, such as economic development) to Fort Collins and other communities impacted by the proposed action. *See* Section V.1 of these Comments.
3. An SDEIS should evaluate cumulative impacts associated with significant Reasonably Foreseeable Actions within Fort Collins that are not included in the DEIS (*See* Section V.3, below).

3b. Specific Comments on DEIS – Aesthetics and Visual Resources

DEIS Section: 3.19 Aesthetics and Visual Resources, page 3-108

Statement: *“This section addresses the existing visual qualities of both the potential reservoir sites and the potential relocation of U.S. 287. These existing qualities may be affected by the construction of any of the reservoirs or the relocation of U.S. 287.”*

Comment: As detailed below, the limitation of the visual resources assessment to reservoir areas and the U.S. Highway 287 relocation is inappropriate. Significant vegetation, recreation, wildlife, sedimentation and other impacts may occur as a result of the proposed alternative, and these may in turn impact the visual qualities of the Fort Collins reach of the River. The assessment needs to include all of the study areas identified in the Visual Resources Comprehensive Technical Report (VRCTR), including the Cache la Poudre River.

DEIS Section: 4.19 Aesthetics and Visual Resources, page 4-11

Statement: *“Issues of concern identified during scoping were the potential effect to existing visual quality near the reservoir sites, the visual impact of relocating U.S. 287, and the impact to scenic resources from hydrologic changes.”*

Comment: Both this section and the Scoping Report identify the issue of impacts to scenic resources from hydrologic changes. Section 4.3.18 (page 16) of the Scoping Report contains the statement, *“Impacts on the aesthetic value of the Cache la Poudre River from reduced flow were of interest.”* Despite these statements, the DEIS does not contain any assessment of impacts to scenic resources, including the Poudre River, from hydrologic changes. The limitation of commentary to reservoir sites and U.S. Highway 287 clearly does not meet the intent of the issues identified in Scoping nor the Visual Resources description. An SDEIS should provide a full assessment of the impacts of NISP on the visual resources of the River.

DEIS Section: 4.19 Aesthetics and Visual Resources, page 4-11

Statement: *“Since aesthetic impacts are anticipated to be negligible, economic impacts are uncertain, but are expected to be similarly negligible.”*

Comment: No data or analysis is presented to support this conclusion. It represents solely the author’s opinion and value system relative to “aesthetics”. No effort was made to solicit the specific views of the general public or NEPA process stakeholders. Aesthetics was one of the issues identified in the public scoping process, and this section of the DEIS fails to adequately address potential changes to aesthetics to City Natural Area, and parks properties and trails adjacent to the Poudre River in light of reduced flows, modifications to riparian vegetation and wildlife, and other factors outlined in the DEIS.

DEIS Section: 4.19.12 Mitigation

General Comment: Mitigation of visual resource impacts to the Poudre River must be addressed (the DEIS is currently silent) in an SDEIS in the context of an adequate analysis of impacts (which analysis has also been omitted from the DEIS).

3c. Comments on Visual Resources Comprehensive Technical Report (VRCTR)

VRCTR Section 2: Study Area, page 17

Statement: *“The study area for the Visual Resources Comprehensive Technical Report includes portions of Larimer and Weld counties that are potentially impacted by project activities...The study area also includes...the Cache la Poudre River Corridor from the Monroe Canal diversion to the confluence with the South Platte River...”*

Comment: This section lists areas included in the Study Area. However, only the potential reservoir areas are described in subsections 2.1 – 2.3. It appears that the Cache la Poudre River and other areas in the study area were excluded from the subsections. In fact, the entire study

area except for the reservoir sites has been excluded from the report. The report needs to include a description of the visual resources in these other areas (as a subsection); the Visual Impacts section (page 34) needs to include an assessment of impacts due to reduced river flows, potential loss of riparian vegetation, algal blooms and other impacts discussed in Part IV of these Comments; and the Potential Mitigation Measures section (page 47) needs to provide mitigation for any impacts to the reduced visual qualities of the River due to lower flows.

In an SDEIS, the Visual Assessment Report (VAR) should provide photo simulations of the River along the affected Corridor at different flow levels. The analysis needs to provide more assessment on the visual impacts of reduced tree densities and fewer tree species as briefly mentioned as an impact in the Recreation Resources Technical Report (RRTR), section 5.1.5, page 47.

The City requested reference information to support the findings in the Visual Resources Comprehensive Technical Report regarding loss of vegetation and impacts to the visual qualities of the River Corridor. The Corps provided in response the Technical Memorandum: NISP Visual Impacts to Recreation Activities, Dated June 18, 2007, to Stacey Antilla from Mark Holdeman, Regarding Text for Recreation Report. This additional document provides no additional substantive information. This lack of underlying data and analysis reinforces the City's concern regarding the need to gather and analyze data regarding the potential visual impacts.

3d. Specific Comments on DEIS - Socioeconomics

DEIS Section: 4.22.2 page 4-91;

And;

NISP Socioeconomic Resources Technical Report Section: 5.1.2 Community Impacts, page 64 & Table 63, page 114

Statement: *“All of the components of NISP action alternatives are located outside of community boundaries. No community cohesion, quality of life, or access impacts are associated with any of the action alternatives.”*

Comment: This statement is inaccurate. Although the construction of NISP facilities occurs outside of incorporated municipalities, reduced river flows impact a number of downstream urban communities (Laporte, Fort Collins, Timnath, Windsor, and Greeley). This report does not assess the impacts on community cohesion, quality of life, or access impacts in these communities so the statement cannot be verified. In fact, many City of Fort Collins' community improvement and development plans are predicated on a robust and healthy Poudre River ecosystem, with connections and access being made between the Downtown and the Downtown River Corridor and the North College Corridor. The impact of reduced flows on these connections is not assessed in the DEIS, and should be part of the analysis.

Because the River is an essential community asset that brings together residents and visitors of all types - gender, race, income, neighborhood and other - it encourages and enhances community cohesion in Fort Collins. Its central role as a biking, running and walking corridor through the City means that it plays an important part in getting residents out of cars and interacting with each other. As discussed elsewhere in these comments, it is an essential part of the quality of life that makes Fort Collins a highly desired location and a critical part of the economic development and redevelopment of the City. The City's comprehensive, community improvement and development plans rely on the River as a critical link between neighborhoods, Downtown, the Downtown River Corridor, the North College Corridor, Natural Areas and Parks.

Community cohesion, quality of life and economic development are all threatened by any action that would diminish the flows of the River, impair water quality, threaten treasured trees and other vegetation, kill or displace fish and impair recreation. Failure to address these important issues through an unsupported blanket dismissal is inconsistent with both the Section 404 Guidelines and the public interest requirements of the Corps' Section 404 implementation regulations. See 33 C.F.R. § 320.4(a); 40 C.F.R. Part 230.

DEIS Section 3.22.2 Socioeconomic Issues, page 3-121

Statement: *“Socioeconomic issues identified in scoping were: Effects to regional population growth”*

Comment: This section does not contain any information regarding effects on population growth in the region, including in and around Fort Collins, despite this being an issue identified in the scoping. The NISP Socioeconomic Resources Technical Report (SRTR) briefly discusses population impacts on participating communities, but does not contain any analysis of the regional population impacts of NISP. The effects of NISP on water rates and the relative desirability of participating communities and neighboring communities could influence migration patterns between communities. In fact, the DEIS on page 4-13 states, “Availability of sufficient water supplies in the municipal areas served by many NISP participants may, however, *help steer growth into those areas* and away from unincorporated portions of the region.” [italics added]. An SDEIS needs to assess the effects on regional population growth, not a narrow assessment of population growth effects in the participating communities.

DEIS Table 4-14, Summary of Socioeconomic Impacts for All Alternatives, page 4-94

Statement: *“Action alternatives – Community Impacts – No impact
Alternative 2 Proposed Action – Recreational value – Offsetting impacts”*

Comment: The community impacts on non-NISP communities such as Fort Collins have not been assessed. As described by the City throughout these Comments, the community impacts to Fort Collins may be substantial. In addition, the recreational values proposed for the Glade Reservoir and the existing and future ones for the Cache la Poudre River are much different. For example, Poudre River recreation includes a proposed Downtown water craft course, which allows for popular whitewater boating confined to one or two drop structures in an urban environment. Alternative 2, on the other hand, is likely to provide hypothetical flatwater boating several miles outside of Fort Collins on Glade Reservoir and primarily for motorized craft. As

discussed above, there is no guarantee that any such flatwater boating would be developed and no demonstration that it would satisfy any significant demand that is not otherwise met at Horsetooth Reservoir or other facilities. For each of these reasons, the recreation impacts do not offset.

DEIS Section: 3.2 Types of Impacts Assessed, page 20

Statement: *“With respect to potential economic impacts, the following issues will be considered...”*

Comment: In addition to the list provided, this section needs to examine the issue of whether the project would impact other values in all of the communities affected by the reduced river flows. An SDEIS needs to consider all economic and social impacts, such as the possibility of reduced property values on private and public land, the impacts on tax revenue from reduced visitation, the economic loss from unrealized development projects, and the impacts to the intrinsic value of the River to the non-participating communities.

3e. Comments on Socioeconomic Resources Technical Report (SRTR)

SRTR Section: 5.1.6 Recreational Values, page 74

Statement: *“Lower flows could potentially impact the aesthetics, which could slightly impact the intrinsic value of the projects and development. Any impacts to the recreational value of activities associated with the Downtown River Corridor Implementation Program or UniverCity Connections, with the exception of the Water Craft Course, are expected to be minor...It can be assumed that the recreational value of activities in this stretch of the river would be diminished if the aesthetics of the area were degraded; however, it has been found that there would only be negligible impacts to the aesthetics. Changes to aesthetics are expected to be unnoticeable by most users, so the impact to the recreational experience of low flows is likely something much less than impacts experienced by river-based activities, such as kayaking and canoeing.”*

Comment: As mentioned under comments in the Aesthetics and Visual Resources Section above, no evaluation of the aesthetics or visual resources of the Downtown River Corridor was included as part of the DEIS. Therefore, these statements are conjecture and are not based on any objective or scientific assessment. The conjecture is also at odds with the real data reflected in the Loomis Report that indicates that City residents would view reductions in flow in the range contemplated by NISP to be very significant. This section needs to describe specifically how the aesthetics could change, such as the reduction of diversity and density of vegetative cover, reduction of wildlife, exposed bed and banks, potential algal blooms, exposure of rip-rap and man-made structures and other factors due to the reduction of river flows. Photo simulations and surveys should be conducted to evaluate the public’s perception of lower river flows and the effects this could have on the visitor’s experience and future development along the River Corridor. A visual representation of historic and anticipated flows in the River should be provided to show the aesthetic impact caused by reduced flows. The impacts of reduced flows upon vegetation along the River, and the cumulative impacts on aesthetics should be analyzed

and considered. The condition of the River in dry years should be given special attention due to anticipated climate changes.

The Loomis Report (2007) is one source of objective information of the public's perceptions of reductions in flows in the River. As the report states, "Respondents were asked how their visitation to the Poudre River would change if peak spring and summer flows were reduced in half...about one-third would visit less with the lower flows, 5% would stop visiting altogether...Households were asked whether they viewed reducing the peak spring and summer flows in half as a Very Good Change, Somewhat Good Change, Neither Good nor Bad, Somewhat Bad Change, Very Bad Change, No Opinion, or Not Enough Information...slightly more than two-thirds of respondents thought such a reduction in flows was a very bad change, with an additional 15% stating it was a somewhat a bad change." An SDEIS should disclose, analyze and respond to this information.

3f. Comments on Reasonably Foreseeable Actions and Cumulative Effects Technical Report (RFACETR)

RFACETR Section: 4.28, page 25

Statement: *"Discovery Science Museum. Conceptual plans are in place for the construction of a new Discovery Science Museum. Two locations are being considered, one along the Poudre River near Lee Martinez Park and the other north of town and not associated with the river. No formal plans are in place for this project; therefore, this action is not considered reasonably foreseeable."*

"Mason Street Corridor Improvements. The City of Fort Collins plans to improve public transportation by constructing a train system along the Mason Street corridor. This new construction venture would bring more people more easily to the downtown area thereby reducing traffic. This project is still in the planning phase; therefore, this action is not considered reasonably foreseeable."

Comment: These two projects, identified as "Actions Not Considered Reasonably Foreseeable", should be identified as "Reasonably Foreseeable Actions" in an SDEIS. The Discovery Science Center has a dedicated source of funding and is planned for construction near the Poudre River and scheduled for completion in 2011 (see <http://www.dcsm.org/media/pr030108.htm> for more information). The Mason Corridor (or "MAX") has also received preliminary approval for federal funding and is currently in an Environmental Assessment review (http://www.fta.dot.gov/printer_friendly/news_events_7787.html). These projects appear to be further along than several of the other projects identified as "Reasonably Foreseeable Actions" – some of which are described as "proposed" or being "investigated".

In addition, there are other projects that need to be included in the list of "Reasonably Foreseeable Actions," as identified below.

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1. The Poudre River Enhancement Project (PREP), which was completed in October, 2003. The project provided conceptual designs for the construction of in-stream drop structures, native vegetation plantings, backwater habitats, bank stabilization, water's edge "discovery points" and other recreation improvements along the Poudre River between Linden Street and Lincoln Avenue in Fort Collins. See <http://www.univercityconnections.org/docs/poudre-river-corridor.pdf> ; <http://www.fcgov.com/riverdistrict/pdf/dtrd-200702.pdf> . For more information, contact Bob Smith, City of Fort Collins Utilities, at 970-224-6021.
2. CSU's Clean Energy Cluster & Engines and Energy Conversion Laboratory in the Old Power Plant building at College and the Poudre River has been incubating energy businesses at its location, such as Envirofit and Solix. New structures have been built to accommodate these companies, and CSU is planning a much larger expansion in the future. See <http://www.eecl.colostate.edu/staff/guy.html>
3. The Bohemian Foundation's Amphitheater/Music Venue is planned for the location of a river oxbow between Linden Street and Lincoln Avenue in the Downtown River Corridor. See <http://fcgov.com/advanceplanning/pdf/downtown-csu-inventory.pdf>
4. The Downtown River District Infrastructure Project has been approved by the Fort Collins City Council and funding available for project work to implement portions of the Project has been identified in the amount of \$3 million. The projects meets the criteria for "Reasonably Foreseeable Actions" as there is "a reasonable certainty as to the likelihood of the future action occurring". See <http://www.fcgov.com/riverdistrict>.

4. References for Part V

- City of Fort Collins, 2008. Characterizing the Poudre River: Past, Present and Future. A summary of key findings by the Poudre Technical Advisory Group. Technical Report.
- City of Fort Collins, Business, Quality of Life (website reference). Available at <http://fcgov.com/business/qol.php>.
- City of Fort Collins, Department of Advance Planning. May 7, 2004. City Comprehensive Plan. Available at <http://www.fcgov.com/advanceplanning/city-plan.php>.
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- City of Fort Collins, Department of Advance Planning. 2000. Downtown River Corridor Implementation Plan. Available at <http://www.fcgov.com/advanceplanning/river.php>.
- City of Fort Collins, Department of Advance Planning. February 17, 2004, amended December 5, 2006. Downtown Strategic Plan. Available at <http://www.fcgov.com/advanceplanning/pdf/dsp-doc.pdf>.
- City of Fort Collins, Department of Advance Planning. March 14, 2007. North College Corridor Plan. Available at <http://www.fcgov.com/advanceplanning/pdf/nccp-doc.pdf>.
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City of Fort Collins, Department of Transportation Planning, Downtown Development Authority, HDR Engineering, and BHA Design. August 2008. Downtown River District Streetscape Improvement Project. Available at http://fcgov.com/riverdistrict/pdf/river_district.pdf.

City of Fort Collins, Department of Utilities. June 2004. Stormwater Master Plan Contact the Utilities Department for access to this document at 970-221-6700, utilities@fcgov.com.

Loomis, J. 2008. Estimating the economic benefits of maintaining peak instream flows in the Poudre River through Fort Collins, Colorado. Colorado State University, Technical Report.

McLaughlin Whitewater Design group. September 3, 2008. Letter to Jason Stutzman, P.E., City of Fort Collins Park Planning and Development, Regarding Whitewater Park Impacts from Reduced Flows in the Poudre River.