

From: Recycling Coalition of Colorado Springs [recycling_coalition@yahoo.com]
Sent: Sunday, November 23, 2008 11:01 PM
To: Kara Lamb
Subject: SIR, SDS EIS comments (fax backup)

Recycling Coalition of Colorado Springs

Fostering greater recycling of resources in our community

November 23, 2008
U.S. Bureau of Reclamation
Eastern Colorado Area Office
11056 W. County Road 18E
Loveland, CO 80537-9711
Attn: Kara Lamb

RE: SIR, SDS EIS -- Comments for Supplemental Information Report (SIR) of the Southern Delivery System (SDS) Environmental Impact Statement (EIS)

Dear Ms. Lamb:

The Recycling Coalition of Colorado Springs offers the following comments regarding the SIR, SDS EIS: **With particular regard to the environmental effects of discharges from the Williams Creek Return Flow Conveyance Pipeline, the Supplemental Information Report should comply with the *Fountain Creek Watershed Plan*.**

Additional information relevant to the analysis:

On October 8, 2003 the Pikes Peak Area Council of Governments, which includes SDS Project Participants City of Colorado Springs and City of Fountain, by formal resolution endorsed the *Fountain Creek Watershed Plan* (FCWP) "as a guide that will provide information and help obtain the resources necessary to develop effective solutions for the Fountain Creek Watershed" (FCWP page 8-2). On October 23, 2003 the Pueblo Area Council of Governments, which includes SDS Project Participant Pueblo West Metropolitan District, approved Resolution No. 2003-029, similarly affirming the revised *Fountain Creek Watershed Plan* (page 8-3). The FCWP can be accessed at http://www.fountain-crk.org/Plan%20Documents/fc_watershedplan.html.

Table 5-2 of the FCWP (page 5-7) ranks "increased baseflow (main channel)" as one of the most severe physical factors influencing the problem of sediment transport in the watershed. The FCWP also concludes:

- "USGS Studies (Stogner, 2000) have shown that increases in streamflow during low flows are primarily a result of increased wastewater treatment plant discharge, importation of transbasin water, and management of the Fountain Creek transbasin return flow exchange decree" (page 7-1).
- "Solutions are needed to address both the **sources of problems** and also to mitigate existing damage... This can be done through the use of water conservation (e.g. encouraging the use of xeriscaping), **increased use of non potable water and alternatives to direct discharge of treated effluent into streams**" (page 7-1, emphasis added).

Proposed Supplemental Information Report revisions:

With particular regard to proposed discharges of "sediment hungry" return flows from the Williams Creek Return Flow Conveyance Pipeline into Fountain Creek (SIR page 72),



the Recycling Coalition finds that the SIR of the SDS EIS does not comply with the above evaluation and conclusions of the FCWP.

Furthermore, FCWP recommendations state:

- "Support and encourage local governments and water providers to implement strategies and promote programs that require the wise use of water, such as long term water conservation efforts, **increased use of non-potable water and alternatives to direct discharge of treated effluent into streams**" (page 7-10, emphasis added).

SDS Project Participant endorsement and approval of such strategies and programs in the FCWP should lead the SIR to primarily address the sources of negative environmental effects on Fountain Creek, instead of only monitoring and mitigating subsequent damage caused by increased streamflow related to the SDS Project (SDS DEIS Appendix C).

Consideration of our comments will be much appreciated.

Sincerely,

Gary Rapp, AICP

Wastewater Leader

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