



Poudre River, Downtown Fort Collins, March 2008

## Save The Poudre Input on the future of the Halligan/Seaman SVP Process

Adopted by STP Coalition on January 27, 2010

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1. The National Environmental Policy Act requires that all alternatives in an EIS process be studied and developed with equal scientific rigor. So far in the Halligan/Seaman process, the “preferred alternative” has undergone intense public scientific analysis and development including the input of dozens of highly trained scientists over a multi-year effort in the SVP process. As the Halligan/Seaman EIS moves forward, we will require that all alternatives to be studied and developed with equal scientific input, equal costs, equal time, and equal public input. If this does not happen, we believe that the National Environmental Policy Act may be violated.
2. Greeley proposes to get a permit 20 years prior to actually building their new reservoir. We do not understand how a project can be permitted that won't be built for 20 years. The conditions on the river could, and likely will, change dramatically over that 20 years. Permit conditions will likely no longer be scientifically or legally valid after 20 years. We need much further explanation about how the Corps and the EPA could consider a permit for a project that won't be built for 20 years, given constant and dramatically changing river conditions, especially in light of potential climate change impacts. We have noted this concern several times, but yet no one has tried to explain it to us.
3. We've said in the past that we might support SVP for all of the alternatives, rather than the limited SVP process that currently is moving forward. Thus, we could likely consider supporting option #4 as discussed in the December workshop: “Use SVP for the EIS/404 process.” As we've said in the past, we are especially interested in various “No-Action Alternatives” and non-structural alternatives that invest heavily in conservation and efficiency. We are also strongly interested in alternatives that protect and increase streamflows in the mainstem of the Poudre through Fort Collins.
4. We are very intrigued, and would like to learn more about, the concept mentioned by Bill Werick in the December workshop that he called “Continually Adaptive Planning.” This concept sounds very much like our “Healthy Rivers Alternative” which suggests addressing supply and demand over time as it is needed, rather than building massive, environmentally destructive, debt-ridden, expensive projects that subsidize and fuel rapid population growth.
5. We very strongly encourage you to consider a range of alternatives that do not engage the Endangered Species Act – i.e., that have no geographic overlap with critical habitat for the Preble's Meadow Jumping Mouse.