

From:  
Dave Gardner  
760 Wycliffe Drive  
Colorado Springs, CO 80906

To: U.S. Bureau of Reclamation  
Eastern Colorado Area Office  
11056 W. County Road 18E  
Loveland, CO 80537-9711

Date: June 13, 2008

Re: Comments on proposed Southern Delivery System

I wish to register my disapproval of every alternative studied in the Southern Delivery System (SDS) Environmental Impact Statement (EIS). This project is ill-advised, whether using Bureau of Reclamation facilities or not. Therefore I request that Bureau of Reclamation facilities not be used for the SDS project.

There are several troubling aspects in the EIS and the project itself:

1. Most over-arching and flawed is the assumption of future need this project is proposed to meet. The EIS relies on demographic projections of 1.2% annual population growth for the City of Colorado Springs. This is presented as a foregone conclusion – this is expected to happen, therefore Colorado Springs must expand its water supply to meet the demand. This population growth will, in fact, not occur if Colorado Springs does not expand its water supply and therefore wisely chooses not to make commitments to provide water it likely cannot deliver. This growth will also not occur if the real estate development and homebuilding industries do not recover from their current “slump.” The factors contributing today to that “slump” exist in a combination never before experienced. One cannot reliably predict that this “slump” will not be a permanent shift for our community from a rapid growth phase into a period of stability. A long period of stability rather than expansion would actually be a blessing and in the best long-term interests of the customers of Colorado Springs Utilities and the citizens of the area (see comments below about future water supply projections).

2. Another flaw is the indicated need for water delivery redundancy to accommodate maintenance of Colorado Springs’ other three water delivery pipelines. Three pipelines should be adequate redundancy to allow maintenance of these facilities. A billion-dollar pipeline project with massive ongoing financial and environmental impacts is not a prudent solution if three pipelines do not provide sufficient redundancy.

3. The cost of building SDS will put a huge financial burden on the ratepayers in future years. The benefits of SDS to current ratepayers are questionable. The cost will work a hardship on families by impacting their bills for life-supporting utilities. Since Colorado Springs Utilities is a community-owned utility, the debt that would be incurred to build SDS should be subject to public vote. The public has not been given the opportunity to approve or disapprove of the most significant public borrowing anticipated in the history of our community.

4. The public has been provided inadequate information about this project. Public communication from Colorado Springs Utilities has been in the form of advocacy for the project, when the public would be more appropriately served by an objective presentation of the facts, including pros and cons, negative impacts as well as positive impacts. Instead, CSU has withheld the negative implications and not provided objective information on alternatives, including the alternative of stopping or greatly reducing the number of new water customers connected each year.

5. Multiple studies predict declining future snowpack in the Colorado River basin. SDS represents an expensive gamble with significant environmental impacts. It bets billions of dollars (including debt service costs) and the welfare of downstream communities on a hope that there will be adequate snowfall to fill the pipe. It could become an empty pipe that bankrupts Colorado Springs Utilities in a future of declining water supply. Future long-term drought or more permanent climate shifts could lead to temporary or permanent reductions in Colorado Springs Utilities' rights to divert some or all of its water in the Colorado River basin.

With this scenario a significant possibility, it is imprudent to build this project and encourage connection of thousands of new water customers the utility may not be able to safely and adequately serve in the future. Even if one completely discards the climate change projections, Department of Interior and State of Colorado studies predict a significant and dangerous gap between water demand and available supply in our state – if we follow the path of attempting to connect the additional customers anticipated in these studies. A prudent solution is not to connect as many new customers as possible and build massive water projects that depend on business-as-usual to finance and justify.

6. SDS will have a negative environmental impact. Millions of dollars in mitigation will be necessary on Fountain Creek. Much of this mitigation is externalized from this project, shifting the burden to some hoped-for combination of local, regional and federal agencies, volunteers, tax dollars and philanthropy.

7. Water quality and quantity in agricultural communities on the Arkansas River downstream from Fountain Creek will be negatively impacted. These environmental and economic impacts are not in the best interests of our neighbors, our state, or even Colorado Springs, regardless of whether Colorado Springs owns a legal “right” to remove water from the Arkansas River.

8. Our city and state must make every effort to reduce our carbon footprint. The financial and environmental costs of generating electricity to power the massive pumps operating 24/7 in the SDS are too great. This project should not go forward without a zero carbon footprint.

For the above reasons, it is best – in fact it is essential – that the Southern Delivery System not be built, whether utilizing Bureau facilities or not. It is the Bureau's responsibility to say “no” to this project wherever the Bureau has the ability to do so.

Thank you for the opportunity to comment.