

FCSG Comments on Greenhouse Gas Impacts of the Northern Integrated Supply Project

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The Fort Collins Sustainability Group (FCSG) has determined that climate change emissions from the Northern Integrated Supply Project (NISP) would derive from four sources: 1) construction of the project, 2) pumping water out of the Poudre River and other ditches and into Glade and Galeton Reservoirs, 3) draining approximately 1,700 acres of wetlands due to depleted flows in the Poudre, and 4) methane emissions from the fluctuating water levels and operations of Glade and Galeton Reservoirs and any other reservoirs that become part of the project.

We would like to focus on numbers 1, 2 and 3. In terms of construction, we have reviewed pertinent documents and find that total climate change emissions produced during construction of the project – also called “embodied” emissions – could be as much as 218,000 metric tons CO₂-equivalent. These emissions from construction alone would be equivalent to the yearly emissions from approximately 46,000 automobiles.

In terms of operational emissions and wetland draining (2 and 3), the total yearly climate change emissions would range from 43,000 to 84,000 metric tons CO₂-equivalent, depending on the alternative chosen. These emissions would be equivalent to emissions from approximately 13,500 automobiles on the road every year for as long as NISP remains operational.

In terms of number (4) above, the scientific literature has not yet reached consensus on methane and carbon dioxide emissions from reservoirs in Western semi-arid environments. However, emissions in this category are likely to be at least several thousand metric tons of CO₂-equivalent each year.

The estimated greenhouse gas emissions of this project come at a time when we should be doing everything we can to reduce those emissions. As planned, NISP will increase the energy demands and the carbon footprint of all project participants. The water sector has been identified as one of the most vulnerable sectors to climate change impacts. Given this vulnerability, it seems ironic that a project designed to increase water availability, might, in fact, contribute to climate change that, at least on a regional basis, might decrease winter snowpack and seasonal rainfall and thus reduce native water flows from many Front Range streams and rivers.

We have three other points:

- Prior to issuing a Final EIS, the Corps should ensure that all indirect and direct emissions increases — both air pollution and CO2 — associated with NISP-spurred regional growth are included in the analysis.
- In any final EIS, the Northern Colorado Water Conservancy District should be required to develop a realistic, feasible, and implementable plan for offsetting all carbon emissions associated with NISP.
- We further believe, in the Final EIS, the Corps should clearly address the impacts of NISP on the future outcomes of the Colorado Climate Action Plan and/or any other regional climate action plans.