

November 24, 2008

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

**RE: Southern Delivery System Supplemental Information Report**

Dear Ms. Lamb:

Thank you for the opportunity to comment on the Supplemental Information Report (SIR) for the Southern Delivery System (SDS). In the next several years, the SDS project will be critically important to the Project Participants who are facing water delivery shortages. It is of the utmost importance to ensure the course of action chosen will protect our community and our environment. Based on the findings from the SIR – which corroborate the findings of the draft EIS – the best course of action is the implementation of SDS Alternative 2 as it will allow for development and protect the water source in an environmentally and economically sound manner.

The SIR adequately addresses the potential effects of urban nonpoint source pollution, as well as the potential cumulative effects of the growth on associated waterways. Based on findings from the SIR, Alternative 2 will decrease the levels of E. coli and will cause negligible increases to dissolved selenium on Fountain Creek.

The SIR further finds that Alternative 2 will protect more wetland areas, which in turn, protects our waterways. Alternative 2 affects approximately 35 percent fewer acres of wetlands than the No Action Alternative and approximately 30 percent fewer acres of jurisdictional wetlands than the No Action Alternative. Of great concern is Alternative 6 which would permanently affect 19.7 acres of wetlands – the highest of all the alternatives – and 30 percent more wetland disturbance than Alternative 2.

Bureau of Reclamation has gone above and beyond the mandates of NEPA to ensure that the public has ample opportunity to review the SDS documents and provide comment. Reclamation has taken public comments into account, as is shown with their additional analysis in the SIR. Further, Reclamation has thoroughly addressed all possible impact scenarios related to the SDS project. It is now time for Reclamation to begin drafting the Final Environmental Impact Statement.

Each of the Project Participants is facing a very real and frightening reality; without SDS, the Project Participants may not be able to adequately continue delivering water to their communities. Of the seven proposed alternatives for SDS, Alternative 2 best protects the health of our communities and our waterways. Please move expeditiously forward with a final EIS and record of decision.

Thank you,



Doug Benevento,  
Former Head of Colorado Department  
of Public Health and Environment