



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ecological Services
Colorado Field Office
P.O. Box 25486, DFC (65412)
Denver, Colorado 80225-0486

IN REPLY REFER TO:
ES/CO: COE/Denver
TAILS: 06E24000-2016-CPA-0062

SEP 27 2016

Mr. John Urbanic
Senior Project Manager
Denver Regulatory Office
Department of the Army
9307 South Wadsworth Boulevard
Littleton, Colorado 80128-6901

Dear Mr. Urbanic:

The U.S. Fish and Wildlife Service (Service) received your email and report on September 7, 2016, regarding the draft Fish and Wildlife Coordination Act (FWCA) report for the proposed Moffat Collection System Project (Moffat Project) in Colorado. You requested our concurrence with draft FWCA report, which was prepared by the consultant, URS Corporation. These comments have been prepared under the provisions of the Fish and Wildlife Coordination Act, as amended (48 Stat. 401; 16 U.S.C. 661 et seq.), and the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 et. seq.).

This FWCA report documents an analysis of the potential consequences to aquatic, wildlife, and vegetation resources of the proposed Moffat Project. The Moffat Project is proposed by the City and County of Denver, acting by and through its Board of Water Commissioners (Denver Water) to develop 18,000 acre-feet per year (AF/yr) of new, annual firm yield to the Moffat Treatment Plant and raw water customers upstream of the Moffat Treatment Plant pursuant to Denver Water's commitment to its customers. The major Federal action analyzed in this FWCA Report and the associated Final Environmental Impact Statement (FEIS) (Corps 2014) is the potential issuance of a Clean Water Act (CWA) Section 404 Permit by the U.S. Army Corps of Engineers (Corps) for placement of fill material in jurisdictional waters of the United States (U.S.), including wetlands, for the construction of an enlarged water storage facility. The proposed Moffat Project would address an overall near-term water supply shortage and the imbalance of water storage and supply between Denver Water's North and South systems.

Alternatives were developed based on requirements under the National Environmental Policy Act of 1969 (NEPA) regulations and Section 404 of the CWA. The alternatives analysis was conducted by the Corps, with review and input from the U.S. Environmental Protection Agency (EPA), the Federal Energy Regulatory Commission (FERC), the Colorado

Department of Natural Resources (CDNR), and the Colorado Department of Public Health and Environment (CDPHE) as Cooperating Agencies, and from Grand County as a consulting agency.

Five action alternatives were developed that encompass a variety of potential water supplies and storage sites. Each action alternative was configured to increase the firm yield of Denver Water's system by 18,000 AF/year, consistent with the Project Purpose and Need statement. The five alternatives include three potential sources of increased water supply (additional Moffat Collection System supplies, reuseable water, and transfer of South Platte River agricultural water rights), and four potential storage components, including Gross Reservoir, Leyden Gulch Reservoir, gravel pit storage, and Denver Basin aquifers. Each alternative was evaluated in the FWCA report for potential effects to aquatic, wildlife, and vegetation resources.

The Service appreciates the opportunity to provide input on this proposed project. Following our review of the FWCA report, the Service is pleased to provide our approval of the FWCA report prepared for this project. Furthermore, the Service has determined that the Corp's responsibilities under the FWCA have been met.

Please direct any questions or comments to Leslie Ellwood of this office at (303) 236-4747.

Sincerely,



Drue DeBerry
Acting Colorado Field Supervisor