



# North Front Range Water Quality Planning Association

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**2020-2022**  
***Strategic Plan***



## TABLE OF CONTENTS

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Executive Summary.....	3
• Introduction .....	4
• Association Overview .....	5
• Association Description.....	7
• Watershed Analysis.....	11
• Planning Responsibilities .....	16
• Objectives and Goals .....	17
• Cost and Implementation Schedule .....	20

## FIGURES

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FIGURE 1 THE FIVE WATERSHEDS IDENTIFIED IN THE AWQMP	9
FIGURE 2 IMPAIRED STREAM SEGMENTS	10
FIGURE 3 SOUTH PLATTE RIVER BASIN BOUNDARY	11
FIGURE 4 NFRWQPA BOUNDARY WITHIN SOUTH PLATTE RIVER BASIN	13
FIGURE 5 FUND BALANCE AND BUDGET EXPENDITURES	21

## TABLES

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TABLE 1 SOUTH PLATTE RIVER BASIN (WQCD, 2018, P. 93)	12
TABLE 2 NFRWQPA RIVERS AND STREAMS IR ASSESSMENT RESULTS	14
TABLE 3 NFRWQPA LAKES & RESERVOIRS IR ASSESSMENT RESULTS	15

## WORKS CITED

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WQCD. (2018). *2018 Integrated Water Quality Monitoring and Assessment Report*. Colorado Water Quality Control Division.

### EXECUTIVE SUMMARY

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North Front Range Water Quality Planning Association (NFRWQPA) is the regional 208 association for water quality planning in Larimer and Weld Counties under state and federal statutes. The Association is responsible for and prepares the annual 208 *Areawide Water Quality Management Plan (AWQMP)*, the planning document under the Federal Clean Water Act per section 208.

The Association recommends strategies to maintain and restore water quality-related environmental issues from regional population growth and development. The planning process is ever-evolving and repetitive due to changing water quality targets and unpredictable growth patterns. As new technology is invented, solutions are found to many challenging pollution problems, even as new issues arise from ever-changing regulations. The AWQMP is designed to support association decisions through sound policies and a regional collaborative approach to water quality planning and wastewater management regarding facilities and agency service areas.

The basis for this Strategic Plan is to protect the water quality within the assigned 208 watershed region by informing management and operational agencies of the environmental impacts of urbanization to ensure planning decisions are educated choices based on accepted science and practices.



# • INTRODUCTION

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### NFRWQPA Strategic Plan integration with the AWQMP

While the 208 Areawide Water Quality Management Plan (AWQMP) provides data and NFRWQPA's policies to maintain and restore the 208 region's water quality, the primary link to the *NFRWQPA Strategic Plan* is through modeling water quality utilizing technology. The strategic plan voluntarily assists local governments, districts, and municipalities in making informed decisions regarding future growth and development and the resulting watershed environmental effects of the modified area.

### Wastewater management planning

NFRWQPA will utilize geographical watershed modeling to forecast, plan, and support treatment facility improvements and amendments to the 208 service areas. The goal is to provide information and data to determine the future needs of wastewater and facilitate improvements to the 208 service areas. The information and data derived can support decisions to maintain or repair water quality standards on receiving waters, including impacts to upstream or downstream discharges. Management and operation agencies responsible for the service area and facilities within can use the models as supporting evidence for planning boards and commissions.



### ● ASSOCIATION OVERVIEW

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The Clean Water Act (CWA), first passed in 1972 and later amended in 1977 and 1987, is the primary federal law regulating surface water quality in the United States. This Act establishes the need for water quality planning, including regional water quality planning, as outlined in section 208. The CWA allows states to administer many programs under the Act as long as the state laws and regulations governing these programs are at least as stringent as the federal Act. The Colorado Water Quality Control Act was established for the state to assume the lead role in many of these program areas, including water quality management. This Act authorizes the governor to designate federal Clean Water Act planning agencies. The NFRWQPA is the designated Planning Agency for Larimer and Weld Counties (Region 2). The Association has the following Mission and Vision:

#### **Mission Statement**

TO USE COLLABORATIVE REGIONAL PLANNING, FACILITATION, AND REVIEW TO ENSURE THAT PRESENT AND FUTURE WASTEWATER NEEDS ARE MET ECONOMICALLY AND WITH A FOCUS ON WATER QUALITY PROTECTION.

#### **Vision Statement**

AS AN ADVOCATE FOR OUR STREAMS, LAKES, AND COMMUNITIES, NFRWQPA ASPIRES TO BE A HIGHLY RESPECTED REGIONAL LEADER IN RESOLVING WATER QUALITY PLANNING ISSUES, AND A SOURCE OF RELIABLE INFORMATION AND DATA, REGULATORY INTERPRETATION, AND THOUGHTFUL COMMENT ON PROPOSALS. IT IS A UNIFYING FORCE IN REGIONAL LONG-TERM WASTEWATER AND WATER QUALITY PLANNING, ENSURING THAT WASTEWATER SERVICE IS PROVIDED WITH COORDINATION EFFORT, AND TECHNICAL EXPERTISE.

## North Front Range Water Quality Planning Association

### 2020-2022 Strategic Plan

As the designated planning agency, the NFRWQPA is responsible for developing and updating the 208 plan to keep it current. Once approved, the 208 plan serves as the overriding planning document used to coordinate regional water quality planning. As stated in the Clean Water Act, the plan shall include “the identification of treatment works necessary to meet the anticipated municipal and industrial waste treatment needs of the area” and “the identification of the measures necessary to carry out the plan.” EPA’s 40 CFR 130.6 establishes policies and program requirements for water quality planning, management, and implementation under several sections of the CWA, including section 208. Included in these program requirements is the need for states to establish a continuing planning process that, among other things, shows the mechanism for updating and maintaining Water Quality Management Plans. The Water Quality Control Division (WQCD) prepared “*A Guide to Colorado Programs for Water Quality Management and Safe Drinking Water*” (Commission Policy #98-2, updated on December 10<sup>th</sup>, 2018). This document can be found on the Water Quality Control Commission’s Website (<https://www.colorado.gov/pacific/cdphe/wqcc-policies>). This document is the latest version of guidelines for the continuous planning process for the state. It also discusses additional details regarding the roles and required elements of 208 plans. It provides a list of components that “need to be kept current through the update and amendment process” for the plans to remain useful decision-making documents.

The plan provides essential information to ensure local water quality goals and objectives are considered in state and federal water quality decision-making. NFRWQPA is responsible for carrying out the tasks identified in the plan. The Association has policies and guidance documents that govern specific activities associated with these tasks. These policies are designed to steer the planning process.

## ● **ASSOCIATION DESCRIPTION**

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- **State and Federal context**

NFRWPQA is the designated planning agency under the Federal Clean Water Act and state statute. The approved AWQMP provides state regulatory agencies and membership guidance to water quality decisions affecting the region. Based on federal law, no facility discharge permit should be issued, which is inconsistent with the approved regional plan per 40 CFR 130.12. As part of the State Water Quality Act, site applications submitted through Regulation 22 are needed to construct or expand wastewater treatment works, lift stations, and major interceptor lines. Following the site application review process and other regulatory review processes, NFRWQPA reviews all proposed water quality and wastewater management projects within the NFRWQPA planning region. The Water Quality Control Division takes all reviews by an appropriate local agency, as required by Regulation 22, into account before issuing final action on on-site application projects.

- **Service areas**

Each wastewater treatment facility within the 208 area has a defined service area. The management agency has oversight to improve and provide service for future development. All service area boundaries must be approved by the Association and presented and updated in the AWQMP as amendments are approved. Service area boundaries may be defined by municipal boundaries, sanitation district boundaries, or hydrologic basins and require updating collection services as needed.

- **Wastewater utility plans**

Wastewater Utility Plans are tools that can assist wastewater utilities in planning for wastewater collection and treatment system changes. Utility plans are critical in determining how wastewater service will be provided to urbanized portions of the region and unique case locations with a permitted wastewater treatment facility. These plans will help to simplify and streamline the process by which utilities seek site approvals and 208 plan amendments through the NFRWQPA. The goal of the NFRWQPA is to have all publicly permitted wastewater treatment systems in the NFRWQPA region to obtain an approved utility plan from the Association.

- **Planning Water quality watershed protection**

The AWQMP and the Strategic Plan aim to develop strategies that will achieve all beneficial uses within all waters of the region. Recently more interest in a watershed-

## North Front Range Water Quality Planning Association

### 2020-2022 Strategic Plan

based permitting approach has gained ground since water quality is affected differently geographically as well as differing ecology spatially. The main focus is still to protect the water quality uses, which vary from region to region. The five watersheds used in the *AWQMP* are shown in Figure 1. The Association is proactively seeking a systematic approach to incorporate into the *AWQMP* a characterization of water quality trends for stream segments in all designated NFRWQPA watersheds by GIS modeling concerning water quality standards and pollutants of concern.

- **Standards and classifications**

The Water Quality Control Division of CDPHE is responsible for assessing whether there is a need for additional water quality data to make recommendations on standard changes to the Water Quality Control Commission. In recent years upon technology advances, this data has become more publicly accessible with websites like the Data Share Network and the Environmental Resource Assessment & Management System (eRAMS), amongst others. These data-sharing networks have provided the public and management agencies with better ways to model water quality characterization trends to be developed for stream segments across the state systematically.





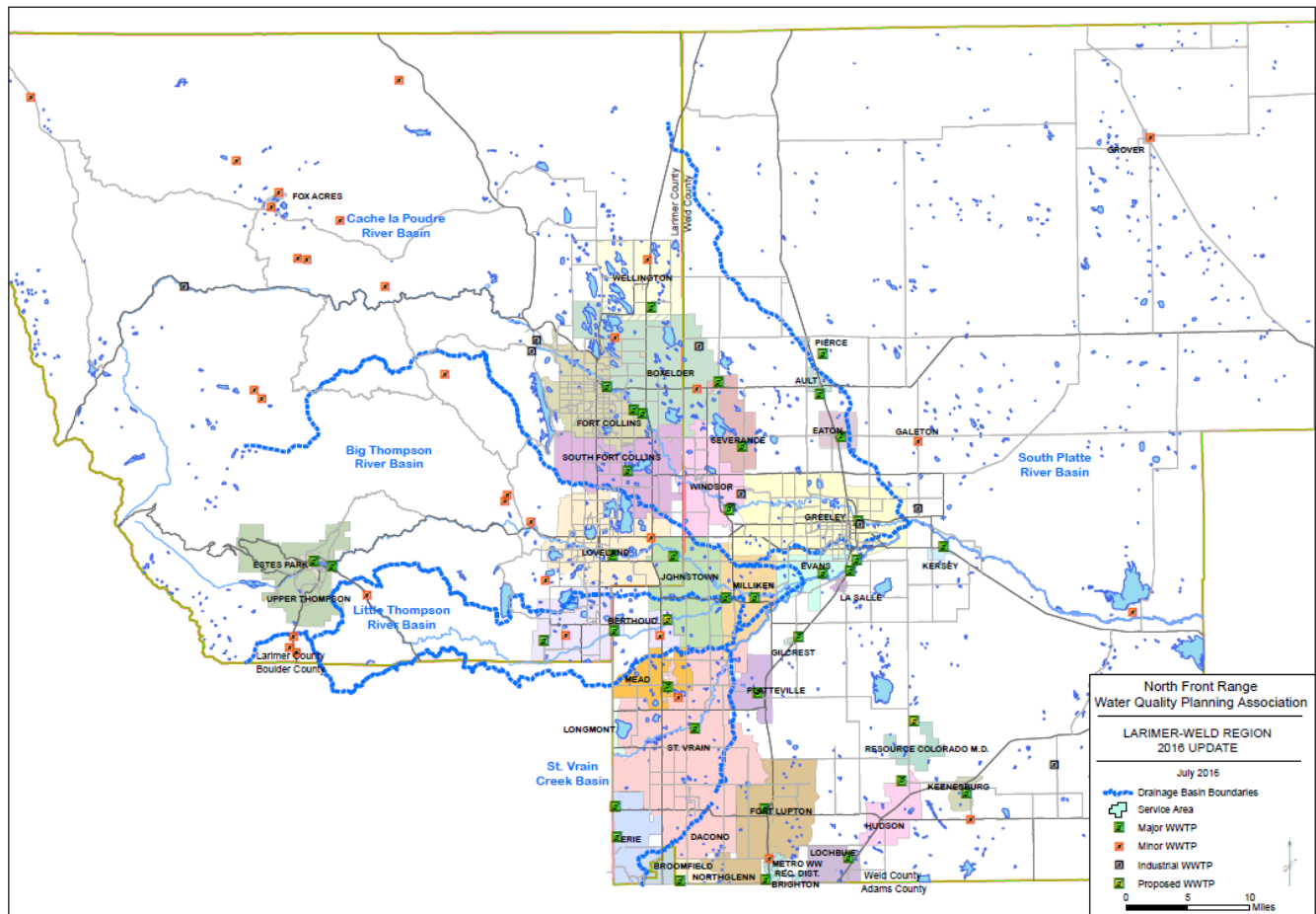


Figure 1 The Five Watersheds Identified in the AWQMP

- **Total Maximum Daily Loads (TMDLs)**

EPA and the Clean Water Act require all waters on the 303(d) list to have Total Maximum Daily Loads (TMDLs) prepared for the river segments to resolve the problems causing water quality impairments. Developing TMDLs is a process that calculates the total amount of pollutant (load) that may be discharged into a water body to ensure that water quality standards are met. A listing of TMDLs completed for the South Platte River Basin can be found on the WQCD website at <http://www.colorado.gov/pacific/cdphe/water-quality-control-commission-regulations> or as provided by the link. Figure 2 on the following page depicts the listed 303(d) segments with the NFRWQPA region.

# North Front Range Water Quality Planning Association

## 2020-2022 Strategic Plan

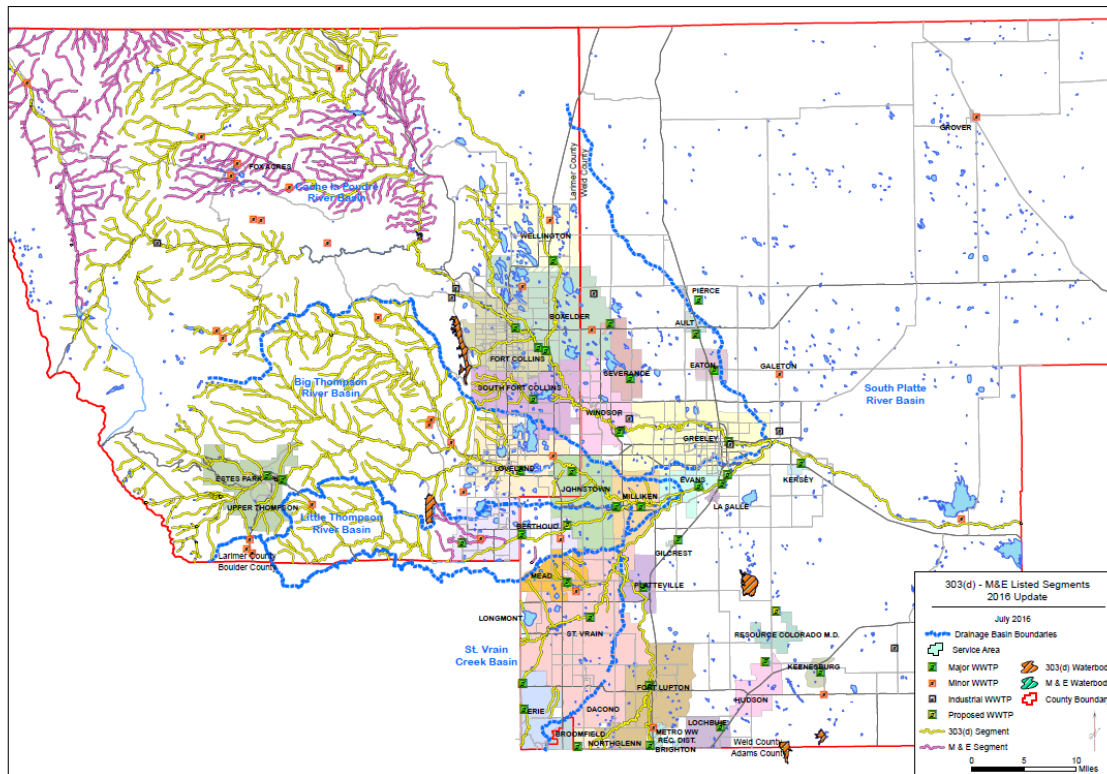


Figure 2 Impaired Stream Segments

## ● WATERSHED ANALYSIS

The South Platte River basin covers approximately 21,000 square miles in northeastern Colorado. The North and South Platte Rivers join in Nebraska to form the Platte River. The South Platte River has the largest population of any river basin in Colorado, almost 70 percent of the state's population. The major tributaries of the South Platte are Bear Creek, Cherry Creek, Clear Creek, Boulder Creek, St. Vrain River, Big Thompson River, and the Cache La Poudre River. Major reservoirs in the South Platte River basin include Cherry Creek Reservoir, Chatfield Reservoir, Barr Lake, Carter Lake, Boyd Lake, and Horsetooth Reservoir.

The South Platte River originates southwest of Denver and flows through the Denver metropolitan area and into the high plains region of Colorado. Elevations in the Platte River Basin range from 14,000 feet in the headwater regions to approximately 3,400 feet in the high plains region. Figure 3 below represents Colorado's South Platte River basin (WQCD, 2018, p. 92).

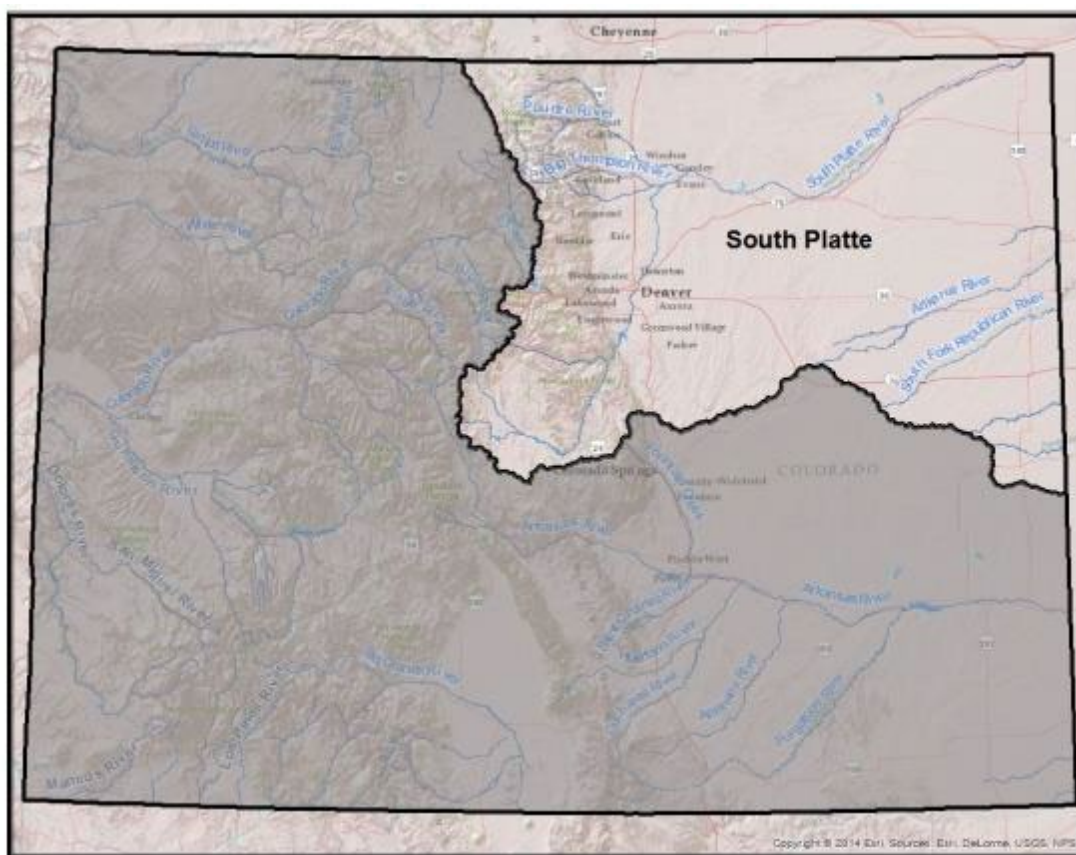


Figure 3 South Platte River Basin Boundary

## North Front Range Water Quality Planning Association

### 2020-2022 Strategic Plan

- South Platte River Assessment Results:** For the South Platte River basin, 96 percent of the river miles and 57 percent of the lake acres have been assessed; 75 percent of the river miles are fully supporting, with an additional 0.83 percent supporting at least some of the uses. For lakes within the South Platte River basin, 37.7 percent of the lake acres fully support all classified uses, and a further 1.58 percent of the lake acres support at least some of the classified uses. The individual use support for the South Platte River basin is summarized in Table 1. Arsenic, *E. coli*, and aquatic life (macroinvertebrates) are the most common listings for rivers and streams; dissolved oxygen and pH are the most common listings for lakes and reservoirs (WQCD, 2018, p. 93).

EPA IR Category		Rivers and streams (miles)	Lakes and reservoirs (acres)
1	Fully supporting	16,509	36,845
2	Some uses supporting	183	1,548
3a	Not assessed	968	41,895
3b	Insufficient data (M&E list)	1,079	2,811
4a	TMDL completed and approved	212	1,724
4b	Impaired, no TMDL necessary	0	0
4c	Impairment is not caused by pollutant	0	0
5	Impaired, TMDL necessary	3,059	12,971

Table 1 South Platte River Basin (WQCD, 2018, p. 93)

**NFRWQPA 208 Area:** The NFRWQPA area region within the South Platte River basin covers Larimer and Weld counties and includes approximately 6,650 square miles in northeastern Colorado. The major tributaries of the South Platte within the NFRWQPA 208 area are South Platte, St. Vrain River, Big Thompson River, and the Cache La Poudre River. Major reservoirs in the South Platte River basin include Carter and Horsetooth Reservoirs. Arsenic and *E. coli* are the most common listings for rivers and streams; whereas Ammonia and Fish Mercury are the most common listings for lakes and reservoirs. Figure 4 represents the NFRWQPA region outlined within the South Platte River Basin.

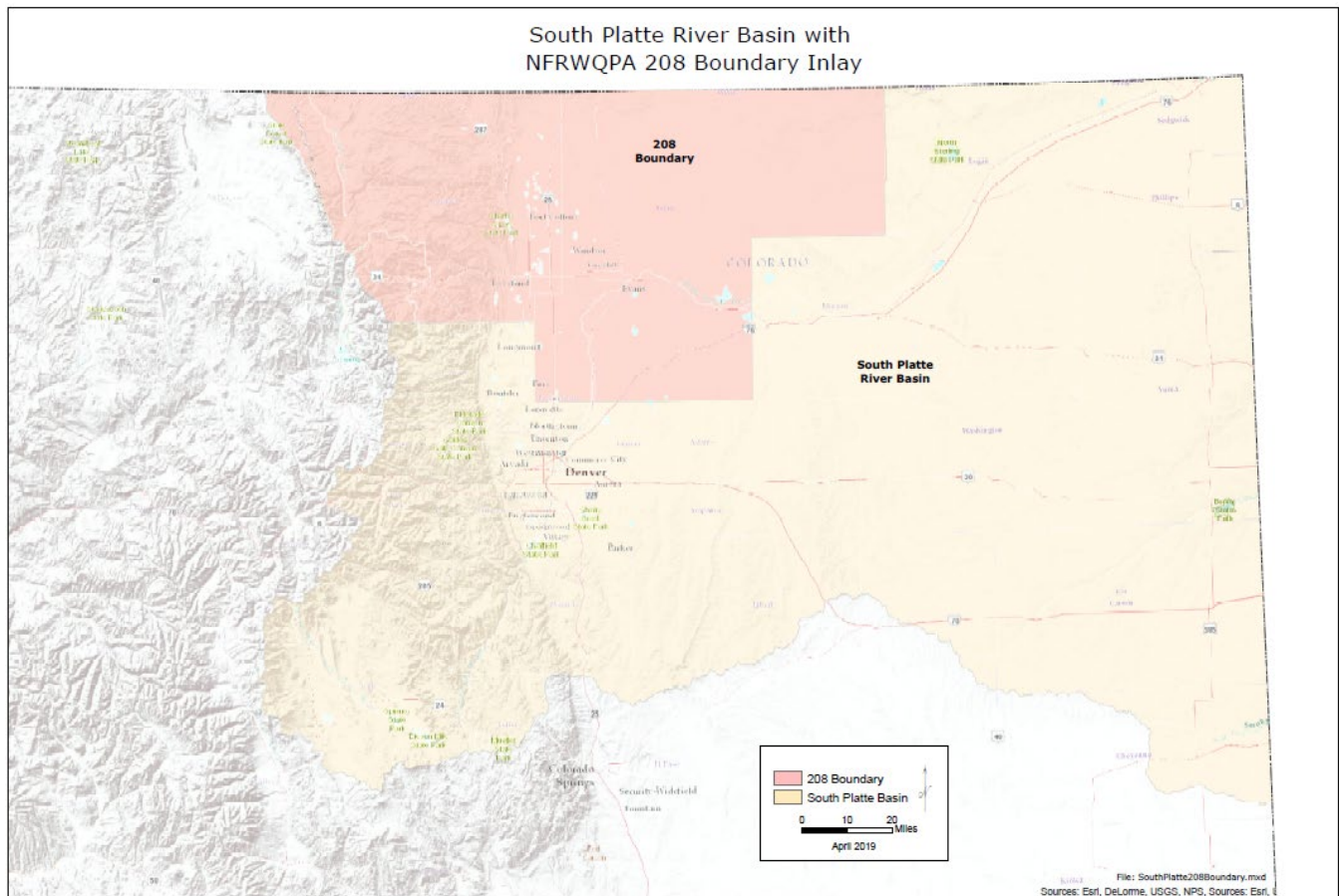


Figure 4 NFRWQPA Boundary within South Platte River Basin

- **South Platte River Basin:** The South Platte River is the primary drainage through Weld County, entering from the south and flowing into Morgan County on the east. In addition to the Cache la Poudre River, Big Thompson River, and St. Vrain Creek, its other significant tributaries are Big Dry Creek, Crow Creek, and Lone Tree Creek. Municipal dischargers in this lowest basin of the region include Ft. Lupton, Gilcrest, Hudson, Lochbuie, Platteville, La Salle, Evans, Pierce, Kersey, Keenesburg, and Grover.
- **Cache la Poudre River Basin:** The Cache la Poudre River drains northern Larimer County’s significant portion and northwest Weld County. Municipal discharges in the basin include Ault, Eaton, Ft. Collins, Fox Acres, Greeley, Severance, Wellington, Windsor, and the Boxelder and South Ft. Collins Sanitation Districts.
- **Big Thompson River Basin:** The headwaters of the Big Thompson River are in Rocky Mountain National Park between the Town of Estes Park and the Continental Divide. After leaving the Big Thompson Canyon, the river flows by Loveland, Johnstown, and Milliken before joining into the South Platte River near La Salle. The Little Thompson River, a major tributary, converges with the Big Thompson at Milliken. Municipal discharges in the

# North Front Range Water Quality Planning Association

## 2020-2022 Strategic Plan

basin include Estes Park and Upper Thompson Sanitation Districts, Loveland, Johnstown, and Milliken to the Big Thompson River, as well as Berthoud and Johnstown to the Little Thompson River.

- St. Vrain River Basin:** The portion of the St. Vrain River Basin lies within Weld County in the NFRWQPA planning area. This is a relatively small portion of the basin at the lower end. The entities in this basin have service area boundaries that are in close proximity to each other. St. Vrain Sanitation District is the significant municipal discharger in the St. Vrain River Basin. Consolidation or regionalization of services should be considered when expanded services or treatment is planned.
- Big Dry Creek River Basin:** Big Dry Creek flows north from the Broomfield area into Weld County and the South Platte River just south of Ft. Lupton. The only municipal treatment plant in the Weld County portion of this basin is that of Northglenn.

**NFRWQPA Assessment Results:** Tables (2-3) below show the NFRWQPA 208 area assessment results for 2018. The tables display a great deal of room for improvement, with 54% of streams and 38% of lakes and reservoirs fully supporting uses.

NFRWQPA IR Assessment of Rivers and Streams							
	2018-EPA IR Category	Total Miles	%	Aquatic Life Use	Recreation	Agriculture	Water Supply
1	Fully supporting	5447.8	54%	1541.1	308.3	2536.9	1061.5
2	Some uses supporting	0	0%	0	0	0	0
3a	Not Assessed	1280.9	13%	0	1280.9	0	0
3b	Insufficient data (M&E list)	584.2	6%	197.7	349.6	0	36.9
4a	TMDL completed and approved	0	0%	0	0	0	0
4b	Impaired, no TMDL necessary	45.7	0%	18.9	0	0	26.8
4c	Impairment is not caused by pollutant	0	0%	0	0	0	0
5	Impaired, TMDL necessary	82	1%	55.2	26.8	0	0
6	Not Supported	2478.8	24%	724	561.4	0	1193.4
7	NA	208.4	2%	0	0	0	208.4
	Total	10127.8					
Actual Total Miles within NFRWQPA = 2537							

Table 2 NFRWQPA Rivers and Streams IR Assessment Results

# North Front Range Water Quality Planning Association

## 2020-2022 Strategic Plan

NFRWQPA IR Assessment of Lakes and Reservoirs							
2018-EPA IR Category		Total Acres	%	Aquatic Life Use	Recreation	Agriculture	Water Supply
1	Fully supporting	9310.1	38%	0	1257	5490.5	2562.6
2	Some uses supporting	0	0%	0	0	0	0
3a	Not Assessed	4233.5	18%	0	4233.5	0	0
3b	Insufficient data (M&E list)	0	0%	0	0	0	0
4a	TMDL completed and approved	0	0%	0	0	0	0
4b	Impaired, no TMDL necessary	26.8	0%	0	0	26.8	0
4c	Impairment is not caused by pollutant	0	0%	0	0	0	0
5	Impaired, TMDL necessary	26.8	0%	26.8	0	0	0
6	Not Supported	10173.2	42%	6051.9	0	1193.4	2927.9
7	NA	416.8	2%	0	0	208.4	208.4
Total		24187.2					

Actual Total Acres within NFRWQPA = 5491

Table 3 NFRWQPA Lakes & Reservoirs IR Assessment Results

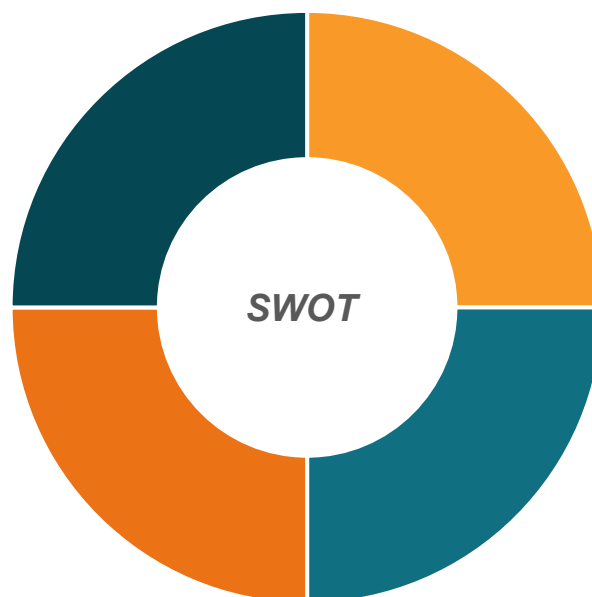
**SWOT analysis:** A SWOT analysis of the Association’s position below assesses its current environmental strengths and weaknesses (internal) and opportunities and threats (external). The Association needs to capitalize on noted opportunities and minimize shortcomings as a planning agency. The Association should reevaluate this SWOT analysis bi-annually.

### STRENGTHS

- Financial reserves
- Capabilities
- Partnerships
- Assets, membership
- Experience
- Value
- Environmental

### OPPORTUNITIES

- Technology
- Innovation
- Partnerships
- Public Hearing Participation
- Outreach & Education
- Update SOPs



### WEAKNESSES

- Participation
- Perception
- Authority
- Awareness
- Resources
- Outdated SOPs

### THREATS

- Economy movement
- Population Growth
- Environmental effects
- Water source quality
- Limited Water Supply
- Quality of Life

# ● PLANNING RESPONSIBILITIES

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By continually updating the areawide 208 plans planning agencies can ensure that association decisions regarding the management and operation agencies within the region are supported through and by current information and data. By federal and state statutes, and as outlined in the state continuing planning process, the NFRWQPA 208 plan is responsible but not limited to the following:

- Biannually review and update the areawide water quality report established and approved by the water quality control commission. The 208 areawide water quality reports provide information and data to support the state *Clean Water Pan* regarding population, wastewater flows, facilities treatment techniques, management and operation agencies, future construction requirements or projects, future agency projects, service areas or expansions, and other regional wastewater and water quality planning information.
- Develop a plan for the region basin by basin which monitors and evaluates water quality and contains information and data on stream modeling, total maximum daily load studies and results, current effluent limits, nonpoint source management, BMPs control, agriculture nonpoint sources, mining, urban stormwater, and recommendations to maintain water quality.
- Recommend solutions for regional short- and long-term problems for improving or constructing wastewater facilities.
- Recommendations within the plan should be economically feasible and should try to include the costs and benefits of the proposals.
- The plan should provide planning efforts for a minimum 20-year planning period.
- Water quality plans should meet the requirements of the Water Quality Control Division and the Water Quality Control Commission.
- The report(s) are repetitive and should be updated as required by the Federal Clean Water Act and the State Water Quality Act.



## • OBJECTIVES AND GOALS

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NFRWQPA uses collaborative regional planning, facilitation, and review to ensure that present and future wastewater needs are met economically for stakeholders and with a focus on water quality protection. Due to the vast differences within the 208 region, geographically and in proportions, the statement mentioned above has many interpretations. Although stakeholders may have different views on collaboration and what is economically feasible, the AWQMP and Strategic Plan are intended to maintain and restore the region's water quality, and surrounding land uses. In the end, the facilitation of protecting the water quality uses in the region is directly related to the rate of population and development.

Proposed regional projects and 208 plan amendments or changes to keep pace with population increases and development are submitted as site applications under Regulation 22. The Water Quality Control Division reviews the site applications and the applicants related Colorado Discharge Permit System (CDPS), taking into account NFRWQPA's recommendation or approval and other local agency referrals as required by Regulation 22.

The goal moving forward, when applicable, is to issue these recommendations or approvals based on the geographical modeling of the proposed project and the environmental water quality impacts or restoration of the proposed project.

Geographic modeling of projects or 208 plan amendments as load estimates, assimilative capacity curves, and current conditions through technology is an affordable science-based approach to protect the water quality in the region. These models, as stated before, can educate, assist, and support management and operation agencies as well as planning departments and commissions on future projects and development proposals.

NFRWQPA's objectives are to provide education, information, and assistance to its membership management and operation agencies, Larimer and Weld County, and the State of Colorado, as listed below:

1. Provide innovative, current, and relevant data to support the 208 Areawide Water Quality Management Plan.
2. Create data and information to monitor and trend the region's water quality.
3. Engage membership, municipalities, and citizens in ways to educate and encourage behaviors toward protecting the region's watershed.
4. Maintain, repair, and protect the region's water quality by long-term collaborative planning beyond the 20-year conventional planning period.

# North Front Range Water Quality Planning Association

## 2020-2022 Strategic Plan

NFRWQPA historically has provided a sustainable environmental program promoting regional wastewater planning based on water quality within the region. NFRWQPA, through partnerships with other water quality associations, are stewards of the water quality within the region. NFRWQPA contributes to the overall body of work in protecting the region's water quality by supporting other water quality associations like the Big Thompson Watershed Forum, Big Dry Creek Watershed Association, Barr Lake and Milton Reservoir Watershed Association, and Colorado State University's One Water Solutions Institute,

Urbanization poses an increasingly real threat to the water quality and quality of life in Larimer and Weld County regions. With regional partnerships, NFRWQPA strives to be a leader in implementing policies and programs that are innovative, economically feasible, educational, and informative while maintaining or repairing the region's water quality. Association membership plays a critical role in environmental stewardship by protecting the watershed and meeting all regulatory standards for point and nonpoint source pollutants while supporting innovative programs beyond compliance and promoting water quality in their service area.

- 2020-2022 goals to meet strategic plan objectives:

### **Short Term:**

- ◆ Discharge Permit, Guidance, and review.
- ◆ Update online interactive GIS mapping of service area boundaries.
- ◆ Integrate eRAMS into 208 Planning for membership and public use.
- ◆ Disseminate education and training materials.
- ◆ Provide group promotional events.
- ◆ The Association will award scholarships for members to attend WEFTEC.

### **Long Term:**

- ◆ Model the assimilative capacity of water quality-based standards and classifications of waterbodies.
- ◆ Calculate the percentage of water quality classified uses and beneficial uses attaining standards for each basin.

## North Front Range Water Quality Planning Association

### 2020-2022 Strategic Plan

- ◆ Construct graphs presenting water quality classified use trends over time.
- ◆ Construct models presenting current wasteload allocations.
- ◆ Construct models of nonpoint source pollution (agriculture, livestock, stormwater, mining activities, possible saltwater intrusions, and urbanization) and best management practices recommendations.
- ◆ Using model information and data, recommend wastewater treatment works and service area consolidation through the 20-year planning horizon and beyond (20-50 years).
- ◆ The Association will present models during planning commission hearings for towns, municipalities, and counties considering development proposals as environmental education.

#### Provisional Guidelines for recommendations and decisions

Maintaining and restoring the water quality uses at a basin and segment level can be accomplished locally within the NFRWQPA membership. NFRWQPA can manage water quality problems at the regional watershed level with stakeholder education and decisions that are long-term and economically feasible. By using scientific-based models to support decisions that maintain and restore the watershed basins and segment protective uses locally, NFRWQPA can maintain, if not improve, the local quality of life. Using Utility Plans supporting information and data from wastewater treatment plants and utility service area(s), long-term planning can be a local collaborative process at the local level. Modeling new or treatment facility amendments in the region will guide the association and management agencies in identifying the best treatment options for a geographical area. As the NFRWQPA region populates and develops, wastewater treatment plant loads increase. At the same time, the facility's applicable effluent standards remain constant for some parameters, whereas other parameter limits decrease, and still new parameters can present challenges. As local and new household water-saving measures are implemented and wastewater treatment technology improves, facilities are experiencing flat-lined hydraulic loads with increasing organic loads. Constant hydraulic loads with increasing organic loads may produce the same effluent discharge. However, the water quality of the effluent may be degrading due to the organic load increase. These problems will require periodic regional evaluations of wastewater facilities to determine long-term planning solutions. By modeling the consolidation of service areas and facilities, the Association and the management and operation agencies can make educated decisions based on accepted science practices.

Local and regional management, operation, and planning departments should make decisions on future development, knowing the effects of growth beyond the 20-year

planning horizon can have on water quality and, ultimately, quality of life. Planning departments and commissions should collaborate regionally to protect water quality uses rather than focus on the local economy based on future development forecasts ensuring to maintain, if not improve, the quality of life locally.

## ● FINANCIAL STATUS

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### Objectives

1. Provide innovative, current, and relevant data to support the 208 Areawide Water Quality Management Plan.
2. Create data and information to monitor and trend the region's water quality.
3. Engage membership, municipalities, and citizens in ways to educate and encourage behaviors toward protecting the region's watershed.
4. Maintain, repair, and protect the region's water quality by long-term collaborative planning beyond the 20-year conventional planning period.

### Executive Summary

NFRWQPA has enjoyed a strong financial situation over the years due to prudent financial practices. The Association has averaged over \$500,000 in reserves annually due to low expenses, conservative money management in the ColoTrust accounts, and consistently coming in under annual budgets. In the unfortunate event revenues decline, NFRWQPA's healthy reserves can serve as operations funds in a recession incident.

### Primary Revenue Drivers.

- Membership Dues – Account for 100% of the association budget.
- Federal 604(b) Money – Annually, the Association receives ≈\$11,000.
- ColoTrust accounts – Annually, the ColoTrust funds generate ≈\$15,000 in interest.

### Primary Expense Drivers.

- Salaries and Wages – Account for 45% of the Budget.
- PERA – Accounts for 6% of the Budget.
- Rent and Utilities – Accounts for 8% of the Budget.
- eRAMS – Will account for 40% of the Budget within those budgeted years.
- New Computers – Will account for 3% of the Budget within that budgeted year.
- Customer Appreciation Day – Will account for 2% of the Budget.

To implement the Primary Expense drivers above in 2020 and 2022.

## North Front Range Water Quality Planning Association

### 2020-2022 Strategic Plan

- NFRWQPA would be 17% over Budget and 2% short of the net assets projection in 2019.
- In 2020, budgeting for eRAMS, the Association would be back to business as usual, coming in 16% under Budget yet achieving 100% of the net asset projection.
- In 2021, association dues will fully support the eRAMS project.
- In 2022, including an eRAMS annual maintenance of \$5,000, the Association remained under Budget at 33% and netted 2% over the projected net assets.

Figure 5 displays the strategic plan cash flow, indicating the Association's fund balance and budget expenditures projected for 2025.

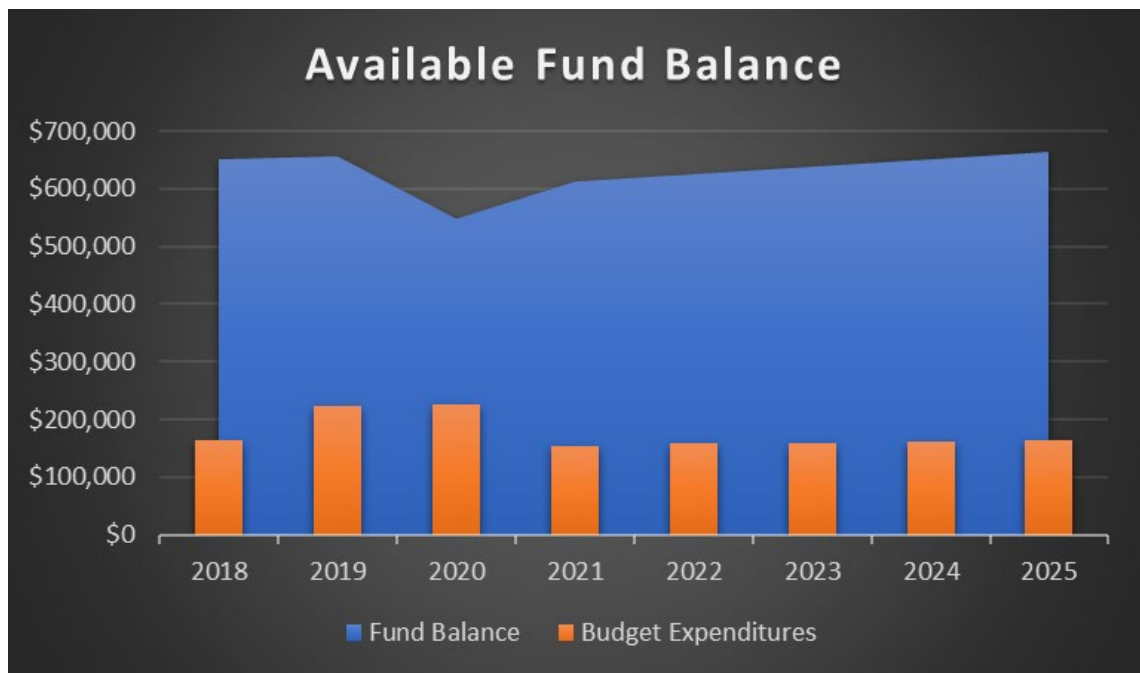


Figure 5 Fund Balance and Budget Expenditures