NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION
257 Johnstown Center Dr.; Unit 206
Johnstown, CO 80534
970-587-8872 – http://www.nfrwqpa.org

EXECUTIVE COMMITTEE AGENDA

May 5, 2022 @ 8:00 AM **Remote Meeting**

Microsoft Teams meeting

Join on your computer or mobile app
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Or call in (audio only)
+1 720-739-6745 United States, Denver
Phone Conference ID: 838 481 751#

Notice is given to the North Front Range Water Quality Planning Association (NFRWQPA) members and the general public. The Association will hold its Executive Committee meeting, which is open to the public, at the date posted above at the NFRWQPA office at 257 Johnstown Center Dr., Unit 207 Johnstown, CO 80534.

1. **CALL MEETING TO ORDER.**

2. **NOTICE TO COMMITTEE MEETING IS RECORDED.**

3. **DETERMINATION OF A QUORUM.**
   Jason Graham -Chair, Brian Zick -Vice Chair, Rob Fleck-Treasure, Jeremy Woolf, Chris Bieker, Todd Hepworth, and Tom Parko.

4. **APPROVAL OF AGENDA.**

5. **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.**

6. **PUBLIC COMMENTS.**

7. **APPROVAL OF PAST MINUTES.** - Attachment #1 (pages -).
   For review and consideration are March 3, 2022, Executive Committee meeting minutes.

8. **ACCOUNTS RECEIVABLES AND PAYABLES REVIEW.** - Attachment #2 (pages -).
   For review and consideration are the accounts receivables and payables for February and March 2022.

9. **DECISION ITEM.** Executive Committee Update - Jason Graham.

10. **DISCUSSION ITEM.** Wastewater Utility Service Area (WUSA) Development Standards – Attachment # (pages -1).
    As discussed in December 2, 2021, January 6, 2022, and the March 3, 2022, Executive Committee meetings, the Association should derive ways to promote optimizing 208 Wastewater Utility Service Areas. WUSA development standards are one possible way the Association could direct coordinated wastewater services regionally as the Regional 208 Planning agency. Executive Committee Members may collaboratively

review, edit, and comment on the file here within the Executive Committee Microsoft Teams 2022 May 5 Meeting folder.

11. **DISCUSSION ITEM.** Utility Plan Guidance Document Consolidation Language – Attachment # (pages 1 -21).
    As discussed in December 2, 2021, January 6, 2022, and the March 3, 2022, Executive Committee meetings,, the Association should derive ways to promote partnerships or consolidation in the Larimer/Weld County region. The Executive Committee may discuss the following Utility Plan Guidance Document Consolidation Language. Executive Committee Members may collaboratively review, edit, and comment on the file here within the Executive Committee Microsoft Teams 2022 May 5 Meeting folder.

12. **DECISION ITEM.** 2022 - 208 Areawide Water Quality Management Plan DRAFT.
    The 2022-208 Areawide Water Quality Management Plan has been sent to the Water Quality Control Division for review and comment. Executive Committee Members may review the DRAFT here in Google Docs.

13. **DISCUSSION ITEM.** 208 AWQMP WUSA Boundary Modifications – Attachment # (pages 22-23).
    Current Language:
    For wastewater utility service area boundary changes by any Management or Operating Agency, a public notice is circulated for the next 60-days by NFRWQPA. Projects included are wastewater utility service area formations greater than or equal to 35 acres or additions to a wastewater utility service area greater than or equal to 10 acres.
    Proposed Language:
    For wastewater utility service area boundary changes by any Management or Operating Agency, a public notice is circulated for the next 60-days by NFRWQPA. Projects included are wastewater utility service area formations greater than or equal to 35 acres or modifications to a wastewater utility service area greater than 10 acres or greater than or equal to 1% of the current total WUSA land area (acres).
    The 10-acre rule came from the equivalent of 10 acres equaling a population of 667 people or 50,000 gpd based on 75 gpcd.

14. **DISCUSSION ITEM.** Legal Fund for Permit reviews and Violations.
    How can the Association help smaller agencies within membership with permit reviews and violations fiscally?

15. **OTHER BUSINESS.**

16. **ADJOURN.**

Attachment #1

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION
257 Johnstown Center Dr.; Unit 206
Johnstown, CO 80534
970-587-8872 – http://www.nfrwqpa.org

EXECUTIVE COMMITTEE MINUTES

March 3, 2022, 8:00 AM **Remote Meeting Only**

1. **CALL MEETING TO ORDER.**
The meeting was called to order at 8:03 AM by Mr. Thomas.

2. **DETERMINATION OF A QUORUM.**
Attendance:

NFRWQPA – Mr. Thomas, Manager
Executive Committee Officers –
Chair – Jason Graham – Ft. Collins
Vice-Chair – Brian Zick – Boxelder S.D.
Treasurer – Robert Fleck – St. Vrain S.D.
Officer – Todd Hepworth – Evans
Officer – Jeremy Woolf – Greeley
Officer – Tom Parko – Weld County
Officer/Proxy – Skip Holland – Weld County

Executive Committee Officers Absent –
Officer – Chris Bieker – Upper Thompson S.D.

Membership –
David Brand – Platteville

Public –
Simon Farrell – JVA

- a quorum was announced.

3. **APPROVAL OF AGENDA.**
Mr. Hepworth moved to approve the agenda seconded by Mr. Woolf. – motion carried unanimously.

4. **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.**
No conflicts of interest were disclosed during the meeting.

5. **PUBLIC COMMENTS.**
Mr. David Brand and Mr. Simon Farrell, with JVA as representatives of the Town of Platteville, discussed the possibility that CDPHE will add a monitoring period for Total Arsenic to Platteville's new discharge permit for the SBR (COG589164), followed by a permit limit of 0.02 ug/L beginning in 2028. Total Arsenic is listed in Regulation # 93 for segment COSPMS01a on the 303(d) list which Platteville discharges. However, 112 samples support the listing of Total Arsenic to COSPMS01a with the WQCD. The general discussion included regional concern for membership for Total Arsenic limits, quarterly sampling and testing, Association-funded regional sampling and testing, and discharge specific variances (DSVs). The general agreement of the committee was that the Association should explore funding regional sampling and testing for Total Arsenic, if DSVs will be allowed, and explore seasonal variations in naturally occurring Arsenic with quarterly sampling.
Note: this was Agenda item #9 in the agenda.

6. **APPROVAL OF PAST MINUTES.**
Meeting minutes from January 6, 2022, were presented for review and consideration. Mr. Woolf moved to approve the minutes seconded by Mr. Fleck. – motion carried unanimously.

7. **ACCOUNTS RECEIVABLES AND PAYABLES REVIEW.**

The accounts receivables and payables for December 2021 and January 2022 were presented and reviewed. Committee discussion included allowing membership to make quarterly dues payments due to the request by Galeton Water and Sewer District. Mr. Fleck questioned what the Association would do if nonmembers didn't pay the required fees for reviews. Mr. Thomas stated the current policy does not cover that situation and should be updated.

Mr. Woolf moved to approve the reviewed accounts receivables and payables for December 2021 and January 2022 and allow quarterly due payments due on the last day of each quarter, seconded by Mr. Hepworth. – motion carried unanimously.

8. **DISCUSSION ITEM.** 208 Region 2 Regulation #93 M&E Listings RFP.
The committee reviewed and discussed the proposed RFP to evaluate the Regulation #93 M&E Listings within Weld and Larimer County. Mr. Zick moved to approve the 208 Region 2 Regulation #93 M&E Listings RFP and form a review committee (Mr. Hepworth, Mr. Woolf, & Mr. Holland) to award the bid, seconded by Mr. Hepworth. Noting this motion and approval also included agenda item #9. – motion carried unanimously.

9. **DISCUSSION ITEM.** 208 Region 2 OWTS Groundwater Quality RFP.
The committee reviewed and discussed proposed RFP to create a GIS interactive mapping of On-Site Wastewater Systems (OWTS) within the Larimer and Weld County Region with funding supported through the Association's 604(b) annual grants, ≈$10,000, for 2021-2022. Mr. Zick moved to approve the 208 Region 2 OWTS Groundwater Quality RFP and form a review committee (Mr. Hepworth, Mr. Woolf, & Mr. Holland) to award the bid, seconded by Mr. Hepworth. – motion carried unanimously, as stated above in agenda item #8.

The following agenda items were not discussed due to time constraints.

10. **DISCUSSION ITEM.** Wastewater Utility Service Area (WUSA) Development Standards.
As discussed in the December 2, 2021, Executive Committee meeting, the Association should derive ways to promote optimizing 208 Wastewater Utility Service Areas. WUSA development standards are one possible way the Association as the Regional 208 Planning agency could direct coordinated wastewater services regionally.

11. **DISCUSSION ITEM.** Utility Plan Guidance Document Consolidation Language.
As discussed in the December 2, 2021, Executive Committee meeting, the Association should derive ways to promote partnerships or consolidation in the Larimer/Weld County region. The Executive Committee may discuss the following Utility Plan Guidance Document Consolidation Language.

12. **DISCUSSION ITEM.** Stream Segment Assimilative Capacity Standards.
Stream Segment Assimilative Capacity Standards is another mechanism that the Association may use to protect the water quality and promote the proposed development standards and partnerships or consolidation in the 208 Region of Larimer/Weld County.

13. **DISCUSSION ITEM.** Utility Plan Professional Certification.
The current Utility Plan Guidance Document does not require professional certification affirming the information and data provided is accurate and true and approved by the local authority. The language found within Attachment #8 may be included in the Utility Plan Guidance Document as the requested professional certification.

14. **OTHER BUSINESS.**

15. **ADJOURN.**

Attachment #2

February 2022

NUMBER	DATE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT			DEPOSIT/CREDIT		BALANCE
		NFRWQPA - 6456	(-)			(+)		$ 36,324.82
		Electronic Deposits						
								$ 36,324.82
								$ 36,324.82
		Paper Deposits						
	1-Feb	Broomfield, Metro, S. Ft. Collins, Boxelder, SVSD, Platteville				$ 39,450.00		$ 75,774.82
		9010-Membership Dues						
	4-Feb	Mead, Estes Park-Town, Larimer County				$ 9,500.00		$ 85,274.82
		9010-Membership Dues						
	25-Feb	Ault, Hudson, & Northglenn				$ 5,150.00		$ 90,424.82
		9010-Membership Dues						
								$ 90,424.82
								$ 90,424.82
								$ 90,424.82
								$ 90,424.82
								$ 90,424.82
					Total	$ 54,100.00		
		Electronic Transactions						
Draft	11-Feb	PERA-Mark-Citistreet 401K	$ 498.47					$ 89,926.35
		3100-Salary						
Draft	11-Feb	PERA/FICA/IRS	$ 1,971.53					$ 87,954.82
		3400-FICA/PERA Manager						
Draft	15-Feb	Tus Nau, LLC-Rent	$ 1,326.00					$ 86,628.82
		5010-Rent & Utilities						
Draft	28-Feb	Payroll-Mark Thomas	$ 6,311.08					$ 80,317.74
		3100-Salary						
Draft	28-Feb	FICA-Co Withholding	$ 1,426.13					$ 78,891.61
		3100-Salary						
AutoPay	N/A	First Nation Bank Credit Card						$ 78,891.61
AutoPay	4-Feb	Century Link	$ 141.63					$ 78,749.98
		5130-Internet Service & Phone						
AutoPay	22-Feb	Shaw & Associates (January 2022 services)	$ 180.00					$ 78,569.98
		5600-Accounting						
AutoPay								$ 78,569.98
AutoPay	4-Feb	Mark Thomas Expense Check (Jan-2022)	$ 75.00					$ 78,494.98
		5100-Telephone Cellular	$ 75.00					
Check #		**PAPER Transactions**						
3754	7-Feb	Colorado Rural Water Association	$ 300.00					$ 78,194.98
		5400-NFR Dues & Subscriptions						
								$ 78,194.98
								$ 78,194.98
		TOTALS	$ 12,229.84			$ 54,100.00		$ 78,194.98
								Difference
		Bank Statement# Ending Balance:				$ 78,194.98		0.00
		Uncashed checks Total:				Balanced Amount		$ -

March 2022

NUMBER	DATE	DESCRIPTION OF TRANSACTION	PAYMENT/DEBIT			DEPOSIT/CREDIT		BALANCE
		NFRWQPA - 6456	(-)			(+)		$ 78,194.98
		Electronic Deposits						
DEP	4-Mar	Loveland				$ 14,500.00		$ 92,694.98
		9010-Membership Dues						
DEP	31-Mar	Fort Collins				$ 14,500.00		$ 107,194.98
		9010-Membership Dues						
		Paper Deposits						
DEP	10-Mar	Northern Colorado Water CD				$ 1,275.00		$ 108,469.98
		9010-Membership Dues						
DEP	10-Mar	Resource Colorado Water & SMD				$ 1,000.00		$ 109,469.98
		9010-Membership Dues						
DEP	15-Mar	Longmont, Berthoud, Keenesburg				$ 18,650.00		$ 128,119.98
		9010-Membership Dues						
DEP	7-Mar	Estes Park Sanitation District				$ 3,150.00		$ 131,269.98
		9010-Membership Dues						
DEP	18-Mar	Galeton W&SD-1st Quarter Payment				$ 250.00		$ 131,519.98
		9010-Membership Dues						
DEP	21-Mar	Eaton & Brighton				$ 4,150.00		$ 135,669.98
		9010-Membership Dues						
								$ 135,669.98
					Total	$ 57,475.00		
		Electronic Transactions						
Draft	11-Mar	PERA-Mark-Citistreet 401K	$ 498.47					$ 135,171.51
		3100-Salary						
Draft	11-Mar	PERA/FICA/IRS	$ 1,971.53					$ 133,199.98
		3400-FICA/PERA Manager						
Draft	15-Mar	Tus Nau, LLC-Rent	$ 1,326.00					$ 131,873.98
		5010-Rent & Utilities						
Draft	28-Mar	Payroll-Mark Thomas	$ 6,311.08					$ 125,562.90
		3100-Salary						
Draft	28-Mar	FICA-Co Withholding	$ 1,426.13					$ 124,136.77
		3100-Salary						
AutoPay	4-Mar	First Nation Bank Credit Card	$ 865.44					$ 123,271.33
	Credit		$ (36.75)					
		5300-Office Supplies	$ 204.24					
		5350-Postage	$ 58.00					
		5300-Office Supplies	$ 139.95					
		5140-IT Support	$ 500.00					
AutoPay	9-Mar	DigeTeks, LLC (Annual Contract)	$ 1,824.00					$ 121,447.33
		5140-IT Support						
AutoPay	8-Mar	Century Link	$ 142.46					$ 121,304.87
		5130-Internet Service & Phone						
								$ 121,304.87
								$ 121,304.87
AutoPay	1-Mar	Mark Thomas Expense Check (Feb)	$ 75.00					$ 121,229.87
		5100-Telephone Cellular	$ 75.00					
		5500-Mileage Reimbursement						
Check #		**PAPER Transactions**						
								$ 121,229.87
								$ 121,229.87
								$ 121,229.87
		TOTALS	$ 14,440.11			$ 57,475.00		$ 121,229.87
								Difference
					Bank Statement# Ending Balance:	$ 121,229.87		0.00
		Uncashed checks Total:	$ -			Balanced Amount		$ -

Attachment #3

Wastewater Utility Service Area (WUSA) Development Standards

Development standards encourage regional collaboration between Designated Management and Operating Agencies (DMOAs) to build easy-to-maintain treatment and collection systems that are economically feasible rather than costly short-term solutions driven by urban development demands. Local governments recognize that water pollution is caused by and has adverse effects on regional development. Even as wastewater and other treatment facilities have improved, water quality goals have become more difficult to meet. Significant regional issues include stormwater management, construction and nonpoint source pollution, biosolids management, wasteload allocations as part of the TMDL setting processes, watershed implementation and screening, water quality monitoring, and use of OWTSs require innovative, cooperative and affordable long-term regional solutions. Since established local government municipal boundaries or special district boundaries frequently do not follow hydrologic boundaries, there can be an increased cost of service associated with this type of urban growth. The wastewater treatment facility for a given municipality or special district can treat wastewater flows from multiple watersheds using force mains and lift stations at a higher cost than gravity flow systems. Due to multiple service area designations, the duplication of infrastructure can occur within a watershed. Duplication of infrastructure can also result in the underutilization of many transmission, collection, and treatment systems. Local plans have been the driving force behind changes to water supply and/or wastewater service areas. In-fill development could be limited in some areas because of insufficient capacity in existing infrastructure and limited opportunities to upgrade these systems. Two critical components for urban development are wastewater service and supply. Along with transportation facilities, these utilities form the skeleton built by a region. Typical wastewater treatment or water supply systems are designed to accommodate projected development through at least a 20-year time period, with some long-range system designs established for 50 years or more. Individual facilities are often sized to meet growth projections for the next 10 or 20 years. Some facilities, such as major interceptors, may be sized for the ultimate development anticipated in a sanitary sewer service area. Excess capacity in transmission, collection or treatment facilities has sometimes been used by some communities to subsidize development. As a result, population and employment projections developed for some facility plans became self-fulfilling and resulted in population and flow increases occurring faster than anticipated. Since the tax base from commercial development and the desire for new growth have been two driving factors in urban development, competition has been fierce among local governments and special districts for service area designations. The advent of the *WUSA Development Standards* changed the approach so that infrastructure decisions could be made beyond the 20-year planning horizon and, in some instances, consider the region's projected ultimate development. Water and wastewater planning must develop long-range, staged utility plans for the most feasible future service area incorporating these WUSA Development Standards. Although future development patterns can affect water management decisions, these standards allow the focus to be on ensuring protection and maintenance of clean lakes and streams, not using water quality regulation to force some predetermined land-use configuration. Instead, WUSA Development Standards support local decisions at a regional level, rather than water quality regulations dictating where and when urban development occurs. Therefore, WUSA Development Standards establishes guidance for DMOAs, in cooperation with the general-purpose governments they serve and surrounding or adjacent DMOAs to:

1. Identify the areas they intend to serve in the long-term (30-50years); and
2. Provide a means to resolve territorial issues related to wastewater service areas before facilities are designed and constructed.

The following Wastewater Utility Service Area (WUSA) development standards for the Association optimize regional collection systems using the best available technology at the lowest cost options while providing the general public with economically feasible solutions. The WUSA Development standards shall also adhere to those construction standards within the WQCD Policy DPR-1. In Region-2, water supply is and will remain a limited resource. A local DMOA coordinated water supply planning involving the water providers will be needed to maximize water supply capacities. It cannot be assumed that all water providers will find sufficient quantities of water to meet all development expectations. Those water providers with surplus water resources could outgrow those providers with limited capacities dictating projected urban development, which will require sanitary services. The foundation of water quality planning is forecasting expected wastewater collection and treatment needs, which is tied to future population projections and urban development. Forecasts define wastewater flow rates and the capacity needed to collect and treat the projected volume of wastewater. Datasets and forecasts for WUSAs are included in the 208 AWQMP.

1. No new WWTFs are allowed within a 5-mile radius of existing WWTFs.
    a. New Regional WWTFs may be built following decommissioning of one or more WWTFs within a 5-mile radius.
    b. New Regional WWTFs may not be built when adjacent collection system service sewer lines are available within two miles of each other.
    c. A maximum of two lift stations are preferred over building new WWTFs.
    d. Existing WWTFs within a 5-mile radius of each other are required jointly to explore consolidation bi-annually, considering current treatment facilities' life cycle costs and the ability for consolidation regarding their sewer collections systems, i.e., line sizing or capacity. Submitting a thorough examination/assessment report with a record of public consideration and decision for inclusion into the 208 Areawide Water Quality Management Plan (208 AWQMP) bi-annual updates.
    e. WUSAs with collection sewer systems within 2.5-miles of each other are encouraged to examine partnerships and consolidation over WWTF capacity increases or lift stations to provide the general public with economically feasible solutions.
    f. Partnerships and Consolidation of WUSAs are encouraged to optimize regional collection systems by topography and significant landmarks.
    g. Consolidation can result in economies of scale for wastewater treatment and better planning to meet increasingly stringent water quality regulations. Additionally, consolidation generally results in lower user rates over time.
    h. Before siting new facilities, existing wastewater treatment facilities should be expanded or consolidated instead of developing new facilities unless not legally or technically feasible.
    i. The Project will not result in excess capacity in existing water or wastewater treatment services or create duplicate services.

2. The following additional criteria apply to any development of major new domestic water and wastewater treatment systems or major extensions of existing domestic water and wastewater treatment systems:

a. The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project or comply with regulatory or technological requirements.
b. To the extent feasible, water and wastewater treatment facilities shall be consolidated with existing facilities within the area.
c. New domestic water and sewage treatment systems shall be constructed in areas which will result in the proper utilization and optimization of existing treatment plants and the orderly development of domestic water and sewage treatment systems of adjacent communities.
d. The Project shall be permitted in those areas in which the anticipated growth and development that may occur as a result of such extension can be accommodated within the financial and environmental capacity of the area to sustain such growth and development.
e. New domestic water and sewage treatment systems shall be permitted in those areas in which the anticipated growth and development that may occur as a result of such extension outside of current urban development can be accommodated within the financial and environmental capacity of the area to sustain such growth and development.

3. Gravity sewers are preferred over lift stations.
    a. If it can be served by gravity, it shall be served by gravity.
    b. Including examing if an adjacent DMOA WUSA may serve a sewered area by gravity can more efficiently, it shall be preferred.

4. Interceptors shall be sized for consolidation sited within 2-miles of an adjacent service area. Interceptors may be staged for ultimate build-out with appropriate economic or right-of-way justification.

5. Lift Stations are allowed when economically infeasible to a gravity sewer within a 5-mile radius.
    a. Proposed lift stations shall include topographical maps illustrating the proposed force main elevations in an elevation profile; additionally, proposed lift stations shall include a gravity line elevation profile displaying sewer line sizes and cost comparisons.
    b. No Lift Stations are allowed when gravity sewer service is available within a 2.5-mile radius.
    c. Proposed Lift Stations within 2.5 miles of an adjacent sewer service agency that is down gradient must provide a letter of agreement for construction documenting that the area in question can not be served by the adjacent agency that is down gradient. Agreements must confirm public meeting minutes and the decision.

6. OWTSs are not allowed when a sewer service line is available, according to the local county health department code and Regulation #43.

7. DMOAs must serve new urban developments that flow by gravity within their approved WUSA. Economic hardship is not considered regarding the DMOA or the Developer.

8. Private Wastewater Operations are Discouraged. The ownership and management of wastewater treatment facilities by homeowner associations or private wastewater operators should not be allowed unless there is no other option. The preferred choice is for the local DMOA to assume ownership and operation of lift stations.

9. Economic Feasibility. The Term Economic Feasibility goes beyond the upfront capital cost of the Project being considered. Economic Feasibility should include the long-term maintenance and operation costs of the Project and the financial burden on ratepayers and residents. The Financial burden consists of the existing tas burden and fee structure for government services, including but not limited to assessed valuation, mill levy, rates for water and wastewater collection and treatment, and costs of water supply. Thus, the Project's net effect is the residents' financial burdens and is considered part of the Economic Feasibility of projects. Beyond the financial burden of the ratepayers and residents, the Project should consider the impacts on the local economy. Description of the local economy including but not limited to revenues generated by the different economic sectors and the value of productivity of different lands. Local economic impacts and net effects of the Project on the local economy and opportunities for economic diversification can be illustrated by examining regional opportunities for consolidation. The determination of technical and financial feasibility of the Project may include but is not limited to the following considerations:

    a. Amount of debt associated with the Project.
    b. Debt retirement schedule and sources of funding to retire the debt.
    c. Estimated construction costs and construction schedule with the Project.
    d. Estimated annual operation, maintenance, and monitoring costs with the Project.
    e. Estimated user rates over the 20-year planning period of the Project.
        a. Changes in costs of water and wastewater treatment.
    f. Estimated local economy impacts over the 20-year planning period of the Project.
    g. Changes in assessed valuation.
    h. Changes in Tax revenues and fees to local governments that will be generated by the Project.
    i. Changes in tax revenues caused by agricultural lands being removed from production.
    j. Changes in opportunities for economic growth and diversification.

10. The Project will not create an undue financial burden on existing or future residents of the Association 208 Planning-Region 2.

11. The Project will not significantly degrade any current or foreseeable future sector of the local economy of the Association 208 Planning-Region 2.

12. The Project will not have a significant adverse effect on the quality or quantity of recreational opportunities and experience of the Association 208 Planning-Region 2.

13. The project's planning, design, and operation shall reflect principles of resource conservation, energy efficiency, and recycling or reuse.

14. The Project shall emphasize the most efficient use of water, including the recycling, reuse, and conservation of water.

15. The Project will not result in excess capacity in existing water or wastewater collection and treatment services or create duplicate services.

16. The Project shall be necessary to meet community development and population demands in the areas to be served by the Project.

17. The Project will not significantly degrade air quality.

18. The Project will not significantly degrade existing visual quality.

19. The Project will not significantly degrade surface water quality.

20. The Project will not significantly degrade groundwater quality.

21. The Project will not significantly degrade wetlands, and riparian areas.

22. The Project will not significantly degrade terrestrial or aquatic animal life or its habitats.

23. The Project will not significantly deteriorate terrestrial plant life or plant habitat.

24. The Project will not significantly deteriorate soils and geologic conditions.

25. The Project will not cause a nuisance.

26. The Project will not significantly degrade areas of paleontological historic, or archaeological importance.

27. The Project will not result in unreasonable risk of releases of hazardous materials.

28. The Project will/will not cause or contribute to urban sprawl or “leapfrog or flagpole” development.

29. Promotes contiguity of development associated with the Project to existing growth centers.

30. The benefits accruing to the County and its citizens from the Project outweigh the losses of any natural, agricultural, recreational, grazing, commercial or industrial resources within the County, or the losses of opportunities to develop such resources.

31. Urban development, population desities, and site layout and design of stormwater and sanitation systems shall be accomplished in a manner that will prevent pollution of surface water and the pollution of aquifer recharge areas.

Attachment #4

Wastewater Consolidation Standards

In evaluating the suitability of a proposed site for a domestic wastewater treatment facility the WQCD must consider any approved regional wastewater management plan for the designated area. State law encourages the consolidation of wastewater treatment facilities as part of the approval process. The Association requires the following subjects be thoroughly examined and provided within the Utility Plan report considering regional Designated Management and Operation Agency (DMOA) partnerships or consolidation with the final decision approved by a public process:

1. **WUSA Consolidation or subdivision.**
   WUSA consolidation and partnership options must be thoroughly assessed considering long-range WUSAs and GMAs to optimized service areas. As adjacent WUSAs or GMAs boundaries encroach or meet, the economic feasibility of service area consolidation improves over more costly treatment facility capacity increases to serve the same local area population. Overloaded collection systems or treatment facilities may consider subdividing their WUSA with local DMOAs with suitable treatment capacity. DMOAs that can provide the same area sewered service by gravity should also be considered to eliminate current or future planned lift stations. Non-urban areas where collection systems are to be constructed should be constructed and sized considering long-term consolidation options. The Association prefers and encourages WUSA partnerships or consolidation for DMOAs within a 5-mile radius over creating additional WWTFs, and gravity sewers over lift stations. DMOAs have a duty and responsibility to evaluate the best regional solutions for collections systems under the CWA Section 208.

   The Project shall be reasonably necessary to meet projected community development and population demands in the areas to be served by the Project, or to comply with regulatory or technological requirements. The determination of whether the Project is reasonably necessary may include but is not limited to the following considerations:

   a. Relationship to reasonable growth projections and local land use plans.
   b. Relationship to other water and wastewater provider's service area.
   c. Whether the Project is not in compliance with regulatory or technological requirements or will not be in compliance in the near future.

2. **Treatment Consolidation or Partnership within a 5-mile radius of WWTFs.**
   Larger wastewater treatment facilities can often provide service more effectively while providing a higher degree of treatment than can be achieved through smaller treatment facilities. Consolidation potentially offers significant capital and operational cost savings through economies of scale, reduced points of failure that can lead to SSOs, improve effluent water quality, and improved management and administration through shared resource availability. Based on rates, economics, cost-effectiveness, operations, water quality impacts, physical constraints

(topography), and water rights. The Association prefers and encourages WUSA partnerships or consolidation for DMOAs within a 5-mile radius over creating additional WWTFs, and gravity sewers over lift stations. DMOAs have a duty and responsibility to evaluate the best regional solutions for treatment systems under the CWA Section 208.

The Project will not result in excess capacity in existing water or wastewater treatment services or create duplicate services. The determination of whether the Project will result in excess capacity or create duplicate services may include but is not limited to the following considerations:

a. Whether the Project creates overlapping or competing service areas.
b. Whether the Project differs significantly from the provider's facility plan.
c. Whether the Project impacts other water and wastewater permits.

To the extent feasible, wastewater and water treatment facilities shall be consolidated with existing facilities within the area. The determination of whether consolidation is **feasible** shall include but is not limited to the following considerations:

a. Whether there is an opportunity for consolidation.
b. The environmental, financial and social feasibility of consolidation.

New domestic water and sewage treatment systems shall be constructed in areas which will result in the proper utilization of existing treatment plants and the orderly development of domestic water and sewage treatment systems of adjacent communities. The determination shall include but is not limited to the following considerations:

a. Relationship to reasonable growth projections and local land use plans.
b. Proximity to other water and wastewater provider's service area.

3. **<u>Population Projections of DMOAs within a 5-mile radius.</u>**

Discuss consolidation opportunities within and beyond the 20-year horizon period as regional planning alternatives for WWTFs and modifications of WUSAs to be documented within the 208 AWQMP. As population projections demonstrate pinch points, overloaded collection systems or treatment facilities should consider subdividing their WUSA with local DMOAs with suitable treatment capacity. WUSA consolidation opportunities should examine the portion of the UPA boundary beyond the GMA or WUSA currently anticipating consolidation opportunities beyond the 20-year planning horizon. Map and description of other municipal and industrial water projects in the vicinity of the Project, including their capacity and existing service levels, location of intake and discharge points, service fees and rates, debt structure and service plan boundaries and reasons for and against hooking on to those facilities.

a. Description of existing domestic water and wastewater treatment facilities in the vicinity of the Project, including their capacity and existing service

levels, location of intake and discharge points, service fees and rates, debt structure and service plan boundaries, and reasons for and against hooking on to those facilities.

b. Description of how the Project will affect urban development, urban densities, and site layout and design of stormwater and sanitation systems.
c. Description of other water and wastewater management agencies in the Project area and reasons for and against consolidation with those agencies.
d. Description of how the Project may affect adjacent communities and users on wells.

4. **Assimilative Stream Segment Capacity Comparison of DMOAs within a 5-mile radius.**

Within the 20-year planning period and beyond, partnerships and consolidation options should consider population projections and resulting stream segment assimilative capacity projections at 5, 10, 15, & 20-year intervals. Overloaded stream segments and WWTPs (85-95%) should consider partnerships and consolidation options above increasing treatment plant capacities. The Association prefers and encourages consolidation or partnerships above increasing treatment plant capacities within a 5-mile radius. DMOAs have a duty and responsibility to evaluate the best regional solutions to protect, maintain, or restore water quality under the CWA Section 208.

5. **Surface Water Quality.**

Map and/or description of all surface waters to be affected by the Project, including:

a. Description of provisions of the applicable regional water quality management plan that applies to the Project and assessment of whether the Project would comply with those provisions.
b. Existing data monitoring sources.
c. Descriptions of the immediate and long-term impact and net effects that the Project would have on the quantity and quality of surface water under both average and worst-case conditions.

The Project will not significantly degrade surface water quality. The determination of effects of the Project on surface water quality may include but is not limited to the following considerations:

a. Changes to existing water quality, including patterns of water circulation, temperature, conditions of the substrate, extent and persistence of suspended particulates and clarity, odor, color or taste of water.
b. Applicable narrative and numeric water quality standards.
c. Changes in point and nonpoint source pollution loads.
d. Increase in erosion.
e. Changes in sediment loading to waterbodies.
f. Changes in stream channel or shoreline stability.
g. Changes in stormwater runoff flows.

h. Changes in trophic status or in eutrophication rates in lakes and reservoirs.
i. Changes in the capacity or functioning of streams, lakes or reservoirs.
j. Changes in flushing flows.
k. Changes in dilution rates of mine waste, agricultural runoff and other unregulated sources of pollutants.

6. Ground Water Quality.

Map and/or description of all groundwater, including any aquifers. At a minimum, the description should include:

a. Seasonal water levels in each subdivision of the aquifer affected by the Project.
b. Artesian pressure in aquifers.
c. Groundwater flow directions and levels.
d. Existing aquifer recharge rates and methodology used to calculate recharge to the aquifer from any recharge sources.
e. For aquifers to be used as part of a water storage system, methodology and results of tests used to determine the ability of aquifer to impound groundwater and aquifer storage capacity.
f. Seepage losses expected at any subsurface dam and at stream-aquifer interfaces and methodology used to calculate seepage losses in the affected streams, including description and location of measuring devices.
g. Existing groundwater quality and classification.
h. Location of all water wells and their uses.
i. Description of the impacts and net effect of the Project on groundwater.

The Project will not significantly degrade groundwater quality. The determination of effects of the Project on groundwater quality may include but is not limited to the following considerations:

a. Changes in aquifer recharge rates, groundwater levels and aquifer capacity including seepage losses through aquifer boundaries and at aquifer-stream interfaces.
b. Changes in capacity and function of wells within the impact area.
c. Changes in quality of well water within the impact area.

7. Water Quantity.

a. Map and/or description of existing stream flows and reservoir levels.
b. Map and/or description of existing Colorado Water Conservation Board held minimum stream flows.
c. Descriptions of the impacts and net effect that the Project would have on water quantity.
d. Statement of methods for efficient utilization of water.

8. Floodplains, Wetlands, and Riparian Areas.

Map and/or description of all floodplains, wetlands, and riparian areas to be affected by the Project, including a description of the types of wetlands, species composition, and biomass.

a. Description of the source of water interacting with the surface systems to create each wetland (i.e., sideslope runoff, over-bank flooding, groundwater seepage, etc.).
b. Description of the impacts and net effect that the Project would have on the floodplains, wetlands and riparian areas.

The Project will not significantly degrade wetlands and riparian areas.
The determination of effects of the Project on wetlands and riparian areas may include but is not limited to the following considerations:

a. Changes in the structure and function of wetlands and riparian areas.
b. Changes to the filtering and pollutant uptake capacities of wetlands and riparian areas.
c. Changes to aerial extent of wetlands and riparian areas.
d. Changes in species' characteristics and diversity.
e. Transition from wetland to upland species.
f. Changes in function and aerial extent of floodplains.

9. **Regional DMOA Credit Trading.**
Partnerships and consolidation options should include water quality trading credits for water quality-based permitted limits, parameters of concern, and assimilative capacity. As population and loading projections demonstrate water quality-based limit pinch points, overloaded stream segments should consider credit trading with local DMOAs with suitable treatment or assimilative capacity.

10. **CIP Economic Feasibility Studies of DMOAs within a 5-mile radius.**
Within the 20-year planning period and beyond, DMOA CIP projects must provide economic feasibility studies compared to consolidation and partnership options for DMOAs within a 5-mile radius. DMOAs have a duty and responsibility to evaluate the best regional solutions to ensure that present and future wastewater needs are financially feasible for the general public as ratepayers under the CWA Section 208. Economic Feasibility. The Term Economic Feasibility goes beyond the upfront capital cost of the project being considered. Economic Feasibility should include the longterm maintenance and operation costs of the project as well as the financial burden on ratepayers and residents. The Financial burden includes the existing tas burden and fee structure for government services including but not limited to assessed valuation, mill levy, rates for water and wastewater collection and treatment, and costs of water supply. Thus, the project's net effect is the residents' financial burdens and is to be considered part of the Economic Feasibility of projects. Beyond the financial burden of the ratepayers and residents the project should consider the impacts on the local economy. Description of the local economy including but not limited to revenues generated by the different economic sectors,

and the value of productivity of different lands. Local economic impacts and net affects of the project on the local economy and opportunities for economic diversification can be illustrated by examining regional opportunities for consolidation.

11. <u>User Rate Studies of DMOAs within a 5-mile radius.</u>

Within the 20-year planning period and beyond, including the known ratepayer DMOA increases provided here within, provide ratepayer economic feasibility studies compared to consolidation and partnership options for DMOAs within a 5-mile radius. DMOAs have a duty and responsibility to evaluate the best regional solutions to ensure that present and future wastewater needs are financially feasible for the general public as ratepayers under the CWA Section 208.

12. <u>Consolidation Record of Public Participation.</u>

Provide a discussion of public meetings, dates, and public hearings, including a general review, comment, and approval component. If a public hearing was held to consider partnerships or consolidation, provide minutes of that meeting in the appropriate appendix as outlined within the checklist, including the economic feasibility options presented for consideration during the public hearing. Confirm regional consolidation decisions, including the reasons for or against, with meeting minutes by the involved agencies' decision-making authorities. Meeting minutes should identify legally responsible personnel with decision-making authority (i.e., mayor, president/chair of the council/board, town or city council/board, public works director, owner, corporate officer, other authorized officials, etc.) with the business, organization, or municipality. The Association and its member DMOAs aspire to be a highly respected regional leader resolving wastewater regional water quality planning issues. DMOAs are a source of reliable information and data utilizing the administrative public comment and decision process. This Association vision can not happen without public participation.

Attachment #5

	Acres	1%
Pierce	402	4.02
Metro Water Recovery	587	5.87
Kersey	969	9.69
Longmont	1,299	12.99
Estes Park SD	1,781	17.81
Brighton	1,969	19.69
Ault	2,038	20.38
Keenesburg	3,156	31.56
Broomfield	3,521	35.21
Northglenn	3,840	38.40
Crystal Lakes W & S	5,624	56.24
Resource Colorado W&SMD	5,640	56.40
Eaton	5,848	58.48
Mead	7,510	75.10
Lochbuie	8,066	80.66
Platteville	9,023	90.23
Evans	11,736	117.36
Severance	11,974	119.74
Hudson	12,026	120.26
Erie	15,901	159.01
Milliken	18,827	188.27
Windsor	21,089	210.89
Wellington	24,592	245.92
Berthoud	27,745	277.45
Johnstown	27,999	279.99
Upper Thompson SD	28,127	281.27
Ft. Collins	29,021	290.21
South Ft. Collins SD	31,533	315.33
Loveland	33,332	333.32
Fort Lupton	33,943	339.43
Boxelder SD	47,139	471.39
Greeley	53,245	532.45
St. Vrain SD	87,628	876.28