



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

ASSOCIATION MEETING AGENDA

November 20, 2025 @ 2:00 PM

Hybrid Meeting

Microsoft Teams

[Join the meeting now](#)

Meeting ID: 217 168 394 855

Passcode: sS79zZ6P

Dial in by phone

[+1 720-739-6745](#) United States, Denver

[Find a local number](#)

Phone conference ID: 812 384 622#

Notice is given to the North Front Range Water Quality Planning Association (NFRWQPA) members and the general public that the Association will hold its regular association meeting, which is open to the public.

1. **CALL MEETING TO ORDER.**
2. **NOTICE TO MEMBERSHIP MEETING IS RECORDED.**
3. **DETERMINATION OF A QUORUM FROM MEMBERSHIP.** – Attachment #1 (page 3).
4. **APPROVAL OF AGENDA.**
5. **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.**
6. **PUBLIC COMMENTS.**
7. **APPROVAL OF PAST MINUTES.** – Attachment #2 (pages 4 - 6).
For review and consideration are the meeting minutes from September 25, 2025.
8. **FINANCIAL REPORTS:** – Attachment #3 (pages 7- ##).
The September and October 2025 financial statements are for review and consideration.
9. **DECISION ITEM:** [City of Evans 208 Wastewater Utility Service Area Modification.](#) – Attachment #4 (pages 12-14).
The City of Evans proposes to modify its 208 Wastewater Utility Service Area (WUSA) boundaries. The Amendment would change the current 208 Wastewater Utility Service Area boundaries within the City of Evans Utility Plan, approved October 26, 2023. The following maps in Attachment #4 and linked above illustrate the current (Figure 1) and proposed (Figure 2) boundaries of the 208 Wastewater Utility Service Area. The 208-boundary revision aims to address the planning area overlap between the City of Evans and the Town of Milliken, and illustrate an area under an Intergovernmental Agreement (IGA) between the City of Evans and the City of Greeley.

Recommendation: Membership Approval.

10. DECISION ITEM: [City of Loveland Railroad Lift Station Site Application](#).

The new Railroad lift station will serve the new Centerra South and Schmer mixed-use developments in east Loveland. The lift station will have a capacity of the maximum monthly average of 0.53 MGD and a peak-hour flow of 1.68 MGD. A 10” diameter force main will convey flows from the lift station approximately 4,400 LF to the west to a 30” diameter gravity interceptor that is served by the City’s Water Reclamation Facility downstream. The Railroad lift station was included within the City of Loveland’s recently approved Utility Plan on May 22, 2025.

Recommendation: Membership Approval.

11. DISCUSSION ITEM: Regulation 85 Triennial Informational Hearing – Attachment #5 (pages 15-17).

The Association submitted the following Regulation 85 Triennial Informational Hearing Comment.

“The Association’s two most significant issues, which need to be addressed with the upcoming Nutrients Management Control Regulation 85 (5 CCR 1002-85) Rule Making Hearing, are:

- 1) that the Voluntary Incentive Program (VIP) for Early Nutrient Reductions Policy 17-1 credits are guaranteed, and
- 2) that agencies can continue to earn credits under the VIP as an incentive to keep operating facilities at a higher level for the treatment of nutrients until Regulation 31 standards are adopted.”

12. DISCUSSION ITEM: [Public Notice - Proposed DRAFT of the 2025 208 Areawide Water Quality Management Plan](#).

The North Front Range Water Quality Planning Association (NFRWQPA) will conduct a public hearing to amend the 2022 Areawide Water Quality Management Plan by adopting the revised 2025 Areawide Water Quality Management Plan. Comments, edits, and corrections may be submitted to the NFRWQPA office at mthomas@nfrwqpa.org. The public hearing date and time are tentatively January 22, 2026, at 2 PM for association consideration and approval.

13. DISCUSSION ITEM: Workgroup Update Presentations.

The workgroup updates are available [here](#). Ideally, you should read them before the meeting and bring any questions you may have. This is the allotted time for any clarification you may need regarding workgroup updates.

14. ADJOURN

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

257 Johnstown Center Dr.; Unit 206
 Johnstown, CO 80534
 970.587.8872 - <http://www.nfrwqpa.org>

Designated Management and Operation Agency Members

	Designation	Primary Contact	Alternate Contact	2025 Dues
1 Ault, Town of	Management/Operation Agency	Grant Ruff	Dustin Preston	PAID
2 Berthoud, Town of	Management/Operation Agency	Chris Kirk	Wayne Ramey	PAID
3 Boxelder Sanitation District	Management/Operation Agency	Brian Zick	David Lewis	PAID
4 Brighton, Town of	Management/Operation Agency	Sherry Scaggiari	Emily Meek	PAID
5 Broomfield, City & County	Management/Operation Agency	Ken Rutt	Dennis Rodriguez	PAID
6 Dacono, City of	Management Agency	Bobby Redd	Jennfier Krieger	PAID
7 Eaton, Town of	Management/Operation Agency	Greg Brinck	Wesley LaVanchy	PAID
8 Erie, Town of	Management/Operation Agency	Jon Coyle	Bruce Chameroy	PAID
9 Estes Park Sanitation District	Operation Agency	Tony Drees		PAID
10 Evans, City of	Management/Operation Agency	Robby Porsch		PAID
11 Fox Acres Community Services	Private Agency	Richard Hopp	James Cates	PAID
12 Frederick, Town of	Management Agency	Bryan Ostler	Tiffany Lozada	PAID
13 Ft. Collins, City of	Management/Operation Agency	Kathryne Marko	Jesse Schlam	PAID
14 Ft. Lupton, City of	Management/Operation Agency	Chris Cross		PAID
15 Greeley, City of	Management/Operation Agency	Tyler Eldridge	Adam Prior	PAID
16 Hudson, Town of	Management/Operation Agency	Bryce Lange	Jennifer Woods	PAID
17 Johnstown, Town of	Management/Operation Agency	Philip Barone	Matt LeCerf	PAID
18 Keenesburg, Town of	Management/Operation Agency	Mark Gray		PAID
19 Kersey, Town of	Management/Operation Agency	Stacy Brown		PAID
20 Larimer County	Management Agency	Keila Flores		PAID
21 LaSalle, Town of	Management/Operation Agency	Barry Schaeffer		PAID
22 Lochbuie, Town of	Management/Operation Agency	AJ Euckert	Wayne Ramey	PAID
23 Longmont, City of	Management/Operation Agency	Azara Bilgin	Mary Paterniti	PAID
24 Loveland, City of	Management/Operation Agency	Joe Creaghe	Brandon Cayou	PAID
25 Mead, Town of	Management/Operation Agency	Hellen Migchelbrink	Erika Rasmussen	PAID
26 Metro Water Recovery	Operation Agency	Erik Burggraf	Jennifer Robinett	PAID
27 Milliken, Town of	Management/Operation Agency	Don Stonebrink	Brad Simons	PAID
28 Northglenn, City of	Management/Operation Agency	Manuel Freye	Shelley Stanley	PAID
29 Pierce, Town of	Management/Operation Agency	Pat Larson		PAID
30 Platteville, Town of	Management/Operation Agency	David Brand	Josh Leyba	PAID
Resource Colorado Water & Sanitation				
31 Metro District		Paul Wilson	Paul Goluskin	PAID
32 Severance, Town of	Management/Operation Agency	Nicholas Wharton	Mike Ketterling	PAID
33 South Ft. Collins San. Dist.	Management/Operation Agency	Derik Caudill	Randy Kenyon	PAID
34 St. Vrain Sanitation District	Management/Operation Agency	Chris Kampmann	Dan Feller	PAID
35 Timnath, Town of	Management/Operation Agency	Earl Smith	Justin Stone	PAID
36 Upper Thompson San. Dist.	Management/Operation Agency	Matt Allen	Suzanne Jurgens	PAID
37 Weld County	Management Agency	David Eisenbraun	Katie Sall	PAID
38 Wellington, Town of	Management/Operation Agency	Bob Gowing	Mike Flores	PAID
39 Windsor, Town of	Management/Operation Agency	Chris Claymore	John Thornhill	PAID

Associates and Industries

40 NCWCD	Associate	Anna Hermes	Ester Vincent	PAID
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40 Representative Votes / 10 Representatives required for Quorum (25%)

rev. 6-2-25

Attachment #2



ASSOCIATION MEETING MINUTES

September 25, 2025, 2:00 PM

1. **CALL MEETING TO ORDER.**

Mr. Thomas called the meeting to order at 2:03 PM.

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

Mr. Thomas notified the membership that the meeting was recorded.

3. **DETERMINATION OF A QUORUM FROM MEMBERSHIP.**

Attendance:

NFRWQPA – Mr. Thomas, Manager
Executive Committee Officers –
Chair – Brian Zick – Boxelder S.D.
Vice Chair – Tyler Eldridge – Greeley
Officer – Chris Kampmann – St. Vrain S.D.
Officer – Savana Dumler – Berthoud
Officer – Randy Kenyon – S. Fort Collins S.D.

Executive Committee Officers Absent –
Treasurer – Jesse Schlam – Ft. Collins
Officer – Matt Allen – Upper Thompson S.D.

Membership –
Chris Claymore – Windsor
Chris Manley – NCWCD
Dustin Preston – Ault
Erik Burggraf – Metro Water Recovery

Keila Flores – Larimer County
Kevin Rhoades – Loveland
Mary Paterniti – Longmont
Meagan Smith – Wellington
Robby Porsch – Evans
Sean Chambers – Greeley
Shelley Stanley – Northglenn
Sherry Scaggiari – Brighton
Stacy Brown – Kersey
Suzanne Jurgens – Upper Thompson, S.D.

Public –
Jimmy Sias – Fuzion Field Services

– Mr. Thomas announced a quorum.

4. **APPROVAL OF AGENDA.**

Mrs. Brown motioned to approve the agenda, seconded by Mr. Zick. The motion carried unanimously.

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

No Potential conflicts of interest were disclosed.

6. **PUBLIC COMMENTS.**

No public comments were stated.

7. **APPROVAL OF PAST MINUTES.**

Mr. Zick motioned to approve the meeting minutes from July 24, 2025, seconded by Mr. Eldridge. The motion carried unanimously.

8. **FINANCIAL REPORTS.**

Mrs. Brown moved to approve the July and August 2025 financial statements, seconded by Mr. Zick. The motion carried unanimously.

9. **DISCUSSION ITEM:** Regulatory Updates.
Mr. Thomas presented the [Water Quality Control Commission's Long-Term Calendar](#) for reference regarding the discussion topics below.
10. **DISCUSSION ITEM:** Regulation 85 (Co-Chair) Update and Input.
Mr. Thomas discussed the upcoming Regulation 85 hearing on November 10, 2025, asking for input and direction from the membership using the following [Regulation 85 Survey](#).
11. **DISCUSSION ITEM:** [Regulation 61](#) Update and Input.
Mr. Thomas discussed the Regulation 61 hearing scheduled for October 14, 2025, asking for input and direction from the membership regarding possible public comment. Recent actions included both the Division and parties agreed to drop recommendations to allow modifications of administratively extended permits, understanding Division resources can be better utilized managing the permit backlog.
12. **DISCUSSION ITEM:** Water Quality Permitting Improvement and Reporting Workgroup (Sterring Committee) Update and Input.
Mr. Thomas discussed the recent meetings of the Water Quality Permitting Improvement and Reporting Workgroup, asking for input and direction from the membership.
13. **DISCUSSION ITEM:** NWRI Feasibility and Implementation Review Panel Update.
Mr. Thomas discussed the NWRI Feasibility and Implementation report.
14. **DISCUSSION ITEM:** Workgroup Update Presentations.
Mr. Thomas presented a summary of the workgroup updates, which are available [HERE](#).
15. **ADJOURN**

Attachment #3

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

Balance Sheet

As of September 30, 2025

Cash Basis

Account	Sep 30, 2025	Aug 31, 2025	\$ Change
Assets			
Current Assets			
Cash and Cash Equivalents			
1100 - Checking NFRWQPA	6,833.20	2,603.93	4,229.27
1250 - Colorado Trust NFRWQPA	600,784.18	621,145.38	(20,361.20)
Total Cash and Cash Equivalents	607,617.38	623,749.31	(16,131.93)
1500 - Security Deposit	1,353.00	1,353.00	0.00
Total Current Assets	608,970.38	625,102.31	(16,131.93)
Total Assets	608,970.38	625,102.31	(16,131.93)
Liabilities and Equity			
Liabilities			
Current Liabilities			
2406 - Accrued Vacation Payable	1,592.31	1,592.31	0.00
2300 - Pension Payable	844.41	844.41	0.00
2407 - PERA Payable	2,535.08	2,535.09	(0.01)
2050 - Mark's CC x5076	169.06	1,180.27	(1,011.21)
Total Current Liabilities	5,140.86	6,152.08	(1,011.22)
Total Liabilities	5,140.86	6,152.08	(1,011.22)
Equity			
2810 - Assets Beginning of Year	572,240.82	572,240.82	0.00
Current Year Earnings	135,363.55	150,484.26	(15,120.71)
3900 - Retained Earnings	(103,774.85)	(103,774.85)	0.00
Total Equity	603,829.52	618,950.23	(15,120.71)
Total Liabilities and Equity	608,970.38	625,102.31	(16,131.93)

No assurance is provided on these financial statements.
 The financial statements do not include a statement of cash flows.
 Substantially all disclosures required by GAAP omitted.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

Statements of Revenue and Expenses - Budget vs Actual

For the one month ended September 30, 2025

Cash Basis

Account	Sep 2025	Jan-Sep 2025	Budget	% of Budget
Income				
9010 - Membership Dues	0.00	178,158.75	174,851.00	101.89%
9015 - Nonmember Review Fees	0.00	2,992.00	0.00	0.00%
9020 - Interest Income	2,138.80	19,241.30	10,000.00	192.41%
9030 - CDPH & E	0.00	10,283.75	26,700.00	38.52%
9040 - 319 Grants NPS Watershed Plan	0.00	91,949.86	25,000.00	367.80%
9990 - Miscellaneous	0.00	20,000.00	0.00	0.00%
Total Income	2,138.80	322,625.66	236,551.00	136.39%
Expenses				
3100 - Salary	10,647.75	95,829.75	127,773.00	75.00%
3102 - Dental Insurance	112.00	1,008.00	1,500.00	67.20%
3103 - Vision Insurance	21.25	191.25	300.00	63.75%
3200 - Health Insurance	2,063.50	18,571.50	25,000.00	74.29%
3300 - Retirement Contributions	319.43	2,874.87	4,500.00	63.89%
3400 - FICA/PERA Manager	1,731.32	15,581.88	25,000.00	62.33%
3600 - Workman's Compensation	0.00	292.00	550.00	53.09%
5010 - Rent & Utilities	1,566.00	14,094.00	20,000.00	70.47%
5100 - Telephone Cellular	75.00	675.00	900.00	75.00%
5120 - Interest	0.00	0.00	10.00	0.00%
5130 - Internet Service	188.26	1,631.51	3,000.00	54.38%
5140 - IT Support	120.00	2,997.41	5,000.00	59.95%
5150 - Advertising	0.00	0.00	500.00	0.00%
5160 - Insurance	0.00	777.00	750.00	103.60%
5300 - Office Supplies	0.00	548.58	2,500.00	21.94%
5350 - Postage	0.00	73.00	150.00	48.67%
5400 - Dues & Subscriptions	100.00	1,761.00	5,000.00	35.22%
5425 - Intergovernmental Assist	0.00	4,000.00	10,000.00	40.00%
5450 - Training	0.00	0.00	500.00	0.00%
5500 - Mileage Reimbursement	0.00	137.34	1,000.00	13.73%
5510 - Meals & Lodging	0.00	378.54	2,500.00	15.14%
5520 - Transportation	0.00	15.50	1,000.00	1.55%
5550 - Conferences	0.00	160.00	3,000.00	5.33%
5600 - Accounting	315.00	2,450.00	4,500.00	54.44%
5650 - Auditing	0.00	0.00	7,500.00	0.00%
5700 - Legal	0.00	10,296.00	15,000.00	68.64%
5750 - Bank Charges	0.00	0.00	50.00	0.00%
5800 - Capital Recovery	0.00	0.00	750.00	0.00%
5850 - Capital Expenditures	0.00	0.00	5,000.00	0.00%
5900 - Contingency Website	0.00	648.00	0.00	0.00%
6010 - Contract Services/GIS	0.00	12,270.00	25,000.00	49.08%
6011 - Contract Services Office	0.00	0.00	2,500.00	0.00%
6025 - Operations Contingency w/Board	0.00	0.00	20,000.00	0.00%
6040 - SUSPENSE	0.00	(0.02)	0.00	0.00%
Total Expenses	17,259.51	187,262.11	320,733.00	58.39%
Net Revenues and Expenses	(15,120.71)	135,363.55	(84,182.00)	-160.80%

No assurance is provided on these financial statements.
The financial statements do not include a statement of cash flows.
Substantially all disclosures required by GAAP omitted.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

Balance Sheet

As of October 31, 2025

Cash Basis

Account	Oct 31, 2025	Sep 30, 2025	\$ Change
Assets			
Current Assets			
Cash and Cash Equivalents			
1100 - Checking NFRWQPA	7,812.88	6,833.20	979.68
1250 - Colorado Trust NFRWQPA	584,890.79	600,784.18	(15,893.39)
Total Cash and Cash Equivalents	592,703.67	607,617.38	(14,913.71)
1500 - Security Deposit	1,353.00	1,353.00	0.00
Total Current Assets	594,056.67	608,970.38	(14,913.71)
Total Assets	594,056.67	608,970.38	(14,913.71)
Liabilities and Equity			
Liabilities			
Current Liabilities			
2406 - Accrued Vacation Payable	1,592.31	1,592.31	0.00
2300 - Pension Payable	844.41	844.41	0.00
2407 - PERA Payable	2,535.07	2,535.08	(0.01)
2050 - Mark's CC x5076	20.00	169.06	(149.06)
Total Current Liabilities	4,991.79	5,140.86	(149.07)
Total Liabilities	4,991.79	5,140.86	(149.07)
Equity			
2810 - Assets Beginning of Year	572,240.82	572,240.82	0.00
Current Year Earnings	120,598.91	135,363.55	(14,764.64)
3900 - Retained Earnings	(103,774.85)	(103,774.85)	0.00
Total Equity	589,064.88	603,829.52	(14,764.64)
Total Liabilities and Equity	594,056.67	608,970.38	(14,913.71)

No assurance is provided on these financial statements.
 The financial statements do not include a statement of cash flows.
 Substantially all disclosures required by GAAP omitted.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION
 Statements of Revenue and Expenses - Budget vs Actual
 For the one month ended October 31, 2025
 Cash Basis

Account	Oct 2025	Jan-Oct 2025	Budget	% of Budget
Income				
9010 - Membership Dues	0.00	178,158.75	174,851.00	101.89%
9015 - Nonmember Review Fees	0.00	2,992.00	0.00	0.00%
9020 - Interest Income	2,106.61	21,347.91	10,000.00	213.48%
9030 - CDPH & E	0.00	10,283.75	26,700.00	38.52%
9040 - 319 Grants NPS Watershed Plan	0.00	91,949.86	25,000.00	367.80%
9990 - Miscellaneous	0.00	20,000.00	0.00	0.00%
Total Income	2,106.61	324,732.27	236,551.00	137.28%
Expenses				
3100 - Salary	10,647.75	106,477.50	127,773.00	83.33%
3102 - Dental Insurance	112.00	1,120.00	1,500.00	74.67%
3103 - Vision Insurance	21.25	212.50	300.00	70.83%
3200 - Health Insurance	2,063.50	20,635.00	25,000.00	82.54%
3300 - Retirement Contributions	319.43	3,194.30	4,500.00	70.98%
3400 - FICA/PERA Manager	1,731.32	17,313.20	25,000.00	69.25%
3600 - Workman's Compensation	0.00	292.00	550.00	53.09%
5010 - Rent & Utilities	1,566.00	15,660.00	20,000.00	78.30%
5100 - Telephone Cellular	75.00	750.00	900.00	83.33%
5120 - Interest	0.00	0.00	10.00	0.00%
5130 - Internet Service	0.00	1,631.51	3,000.00	54.38%
5140 - IT Support	0.00	2,997.41	5,000.00	59.95%
5150 - Advertising	0.00	0.00	500.00	0.00%
5160 - Insurance	20.00	797.00	750.00	106.27%
5300 - Office Supplies	0.00	548.58	2,500.00	21.94%
5350 - Postage	0.00	73.00	150.00	48.67%
5400 - Dues & Subscriptions	0.00	1,761.00	5,000.00	35.22%
5425 - Intergovernmental Assist	0.00	4,000.00	10,000.00	40.00%
5450 - Training	0.00	0.00	500.00	0.00%
5500 - Mileage Reimbursement	0.00	137.34	1,000.00	13.73%
5510 - Meals & Lodging	0.00	378.54	2,500.00	15.14%
5520 - Transportation	0.00	15.50	1,000.00	1.55%
5550 - Conferences	0.00	160.00	3,000.00	5.33%
5600 - Accounting	315.00	2,765.00	4,500.00	61.44%
5650 - Auditing	0.00	0.00	7,500.00	0.00%
5700 - Legal	0.00	10,296.00	15,000.00	68.64%
5750 - Bank Charges	0.00	0.00	50.00	0.00%
5800 - Capital Recovery	0.00	0.00	750.00	0.00%
5850 - Capital Expenditures	0.00	0.00	5,000.00	0.00%
5900 - Contingency Website	0.00	648.00	0.00	0.00%
6010 - Contract Services/GIS	0.00	12,270.00	25,000.00	49.08%
6011 - Contract Services Office	0.00	0.00	2,500.00	0.00%
6025 - Operations Contingency w/Board	0.00	0.00	20,000.00	0.00%
6040 - SUSPENSE	0.00	(0.02)	0.00	0.00%
Total Expenses	16,871.25	204,133.36	320,733.00	63.65%
Net Revenues and Expenses	(14,764.64)	120,598.91	(84,182.00)	-143.26%

No assurance is provided on these financial statements.
 The financial statements do not include a statement of cash flows.
 Substantially all disclosures required by GAAP omitted.

Attachment #4



Figure 1: City of Evans **Current** 208 Wastewater Utility Service Area (WUSA):

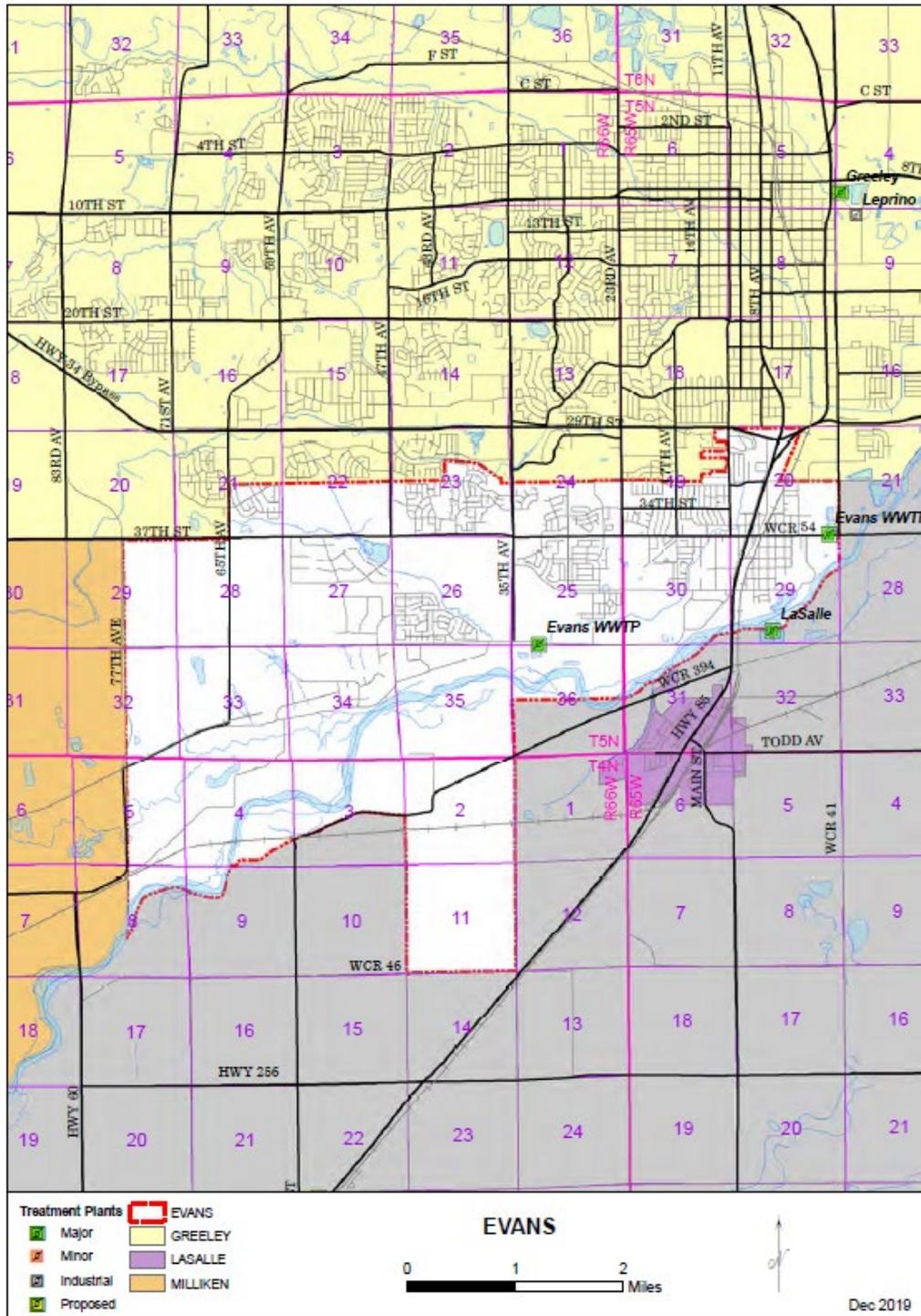
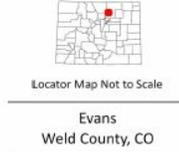
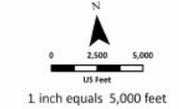
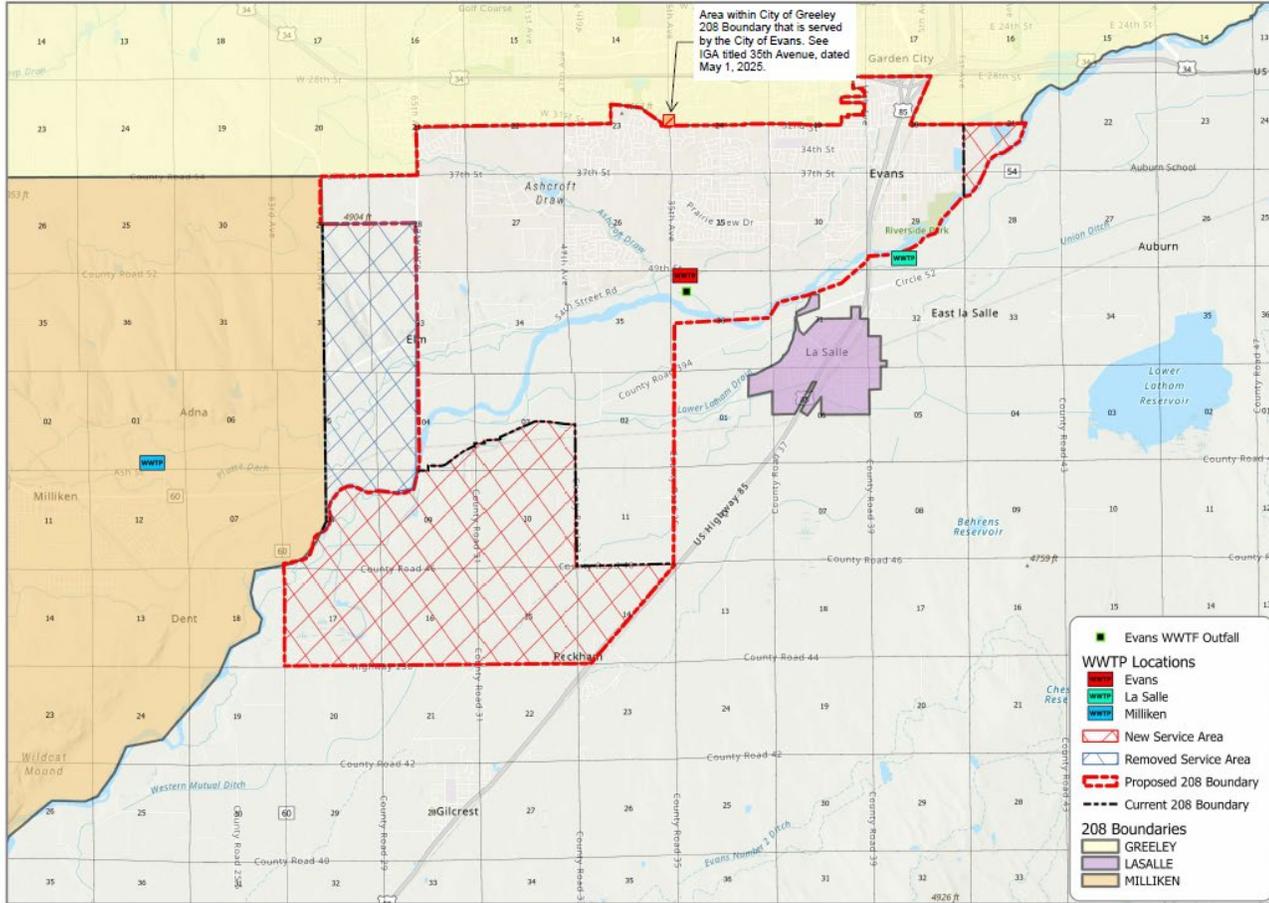


Figure 2: City of Evan's Proposed 208 Wastewater Utility Service Area (WUSA); Red Dashed Line (Revised Map 8-15-2025):

www.ae2s.com | Advanced Engineering and Environmental Services, LLC



**PROPOSED
AMENDED 208
BOUNDARY**

CITY OF EVANS

Date: 10/11/2024



Information depicted may include data unverified by AE2S. Any reliance upon such data is at the user's own risk. AE2S does not warrant this map or its features are either spatially or temporally accurate.
Coordinate System: NAD 1983 2011 StatePlane Colorado North FIPS 0501 PL US | Edited by: Clidenberg | W:\E\Evans CO\14272-2021-003\GIS\14272-2021-003 Evans - Mapping and Analysis.aprx | Evans 208 Boundary

Attachment #5

WATER QUALITY CONTROL COMMISSION; STATE OF COLORADO

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION TRIENNIAL INFORMATIONAL HEARING, NUTRIENTS MANAGEMENT CONTROL REGULATION 85 COMMENTS

DATE: OCTOBER 29, 2025

SUBMITTED TO: cdphe.wqcc@state.co.us

RE: TRIENNIAL INFORMATIONAL HEARING, NUTRIENTS MANAGEMENT
CONTROL REGULATION 85; REFERENCED [HERE](#).

North Front Range Water Quality Planning Association (the Association) submits the following comments concerning the Triennial Informational Hearing, Nutrients Management Control Regulation 85 (5 CCR 1002-85).

1. Introductory

The Association is the designated 208 Planning Agency for Larimer and Weld Counties. The Association represents its member entities in water-quality legislative and regulatory actions. The primary goal of the Association is to provide regional land-use management planning mechanisms for reasonable, feasible, and economical wastewater service to areas designated for development within the South Platte watershed, while considering the water quality impacts the treatment system, and interrelated wastewater utility service areas' nonpoint pollution sources will have on receiving waters in the watershed. Including groundwater influences by those management agencies with groundwater discharges.

2. Triennial Informational Hearing Comment

The Association's two most significant issues, which need to be addressed with the upcoming Nutrients Management Control Regulation 85 (5 CCR 1002-85) Rule Making Hearing, are:

- 1) that the Voluntary Incentive Program (VIP) for Early Nutrient Reductions Policy 17-1 credits are guaranteed, and
- 2) that agencies can continue to earn credits under the VIP as an incentive to keep operating facilities at a higher level for the treatment of nutrients until Regulation 31 standards are adopted.

Given VIP's success in terms of the number of participants and the credits earned across the state, VIP credits shall be guaranteed and implemented as stated in the policy. "As part of the incentive program, facilities that reduce levels of nutrients in their discharge beyond what is required will earn extra time in the form of an extended permit compliance schedule. This extended compliance schedule *will be* applied in the facilities' first permit renewal after 2027."

As reported by the Division during the Water Quality Forum Retreat, VIP participants reduced nitrogen by 434 tons/yr in 2023 compared to 2018, and phosphorus by 333 tons/yr in the same period, while effluent flow increased by 8% and population increased by 3.5%. Noting that the Front Range population increased 10% during the same period. As such, Regulation 85 and the VIP Policy have achieved significant improvements in water quality.

Recognizing these water quality gains came at a significant cost for all participating agencies, with the understanding that VIP credits “will be” guaranteed and granted within the facilities' first permit renewal after 2027. Realizing that all municipalities, towns, cities, and districts, administrators, boards, and their ratepayers understand that VIP credits are guaranteed when Nutrient treatment upgrades were approved, as well as user rate increases, as process treatment costs increased accordingly.

Respectfully submitted,

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