

# NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

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November 10, 2016

Water Quality Control Commission  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

Dear Commissioners;

The North Front Range Water Quality Planning Association is pleased to submit the 2016 Update of the Areawide Water Quality Management Plan to the Commission for consideration. The Commission has reserved a hearing time at the December 12<sup>th</sup>, 2016 meeting for the consideration of the Update.

The original Areawide Water Quality Management Plan for the Larimer and Weld County COG was done in 1985. Since the development of that comprehensive report, several updates have been completed. Each of these updates was intended to supplement the original plan. The most recent update considered by the Commission was in 2013 and was approved by the Commission in December of 2011. The 2016 Update will serve as a replacement of the 2013 Update and like previous updates, includes information the Association deems necessary to keep the area plan current. These are, as listed in the Clean Water Act, “the identification of treatment works necessary to meet the anticipated municipal and industrial waste treatment needs of the area” and “the identification of measures necessary to carry out the plan.” The following is a summary of the specific changes made in the update listed by Chapter:

1. Introduction
  - Included reference to the new “Guide to Colorado Programs for Water Quality Management and Safe Drinking Water” (Policy 98-2) completed in August, 2013.
  - The Wastewater Management / Operating Agencies list was updated to reflect the current agencies for the region.
2. Statewide Water Quality Management Plan
  - This Section was revised to reference the newly completed Policy #98-2 - “Guide to Colorado Programs for Water Quality Management and Safe Drinking Water” (August 2013) and its link with Statewide Water Quality Management Plan and 208 Planning.
  - This section also discusses Nonpoint Source Pollution Activities and a link to the Non-Point source website is included.
3. Water Quality
  - This section was revised to include a brief discussion of the Total Daily Maximum Load (TMDL) process with a link to current TMDLs on the South Platte Basin.
  - The previous 303(d) List and Monitoring and Evaluation List was replaced with the current values provided from the CDPH&E website.
  - A map highlighting the listed segments for the region was also included in this chapter and is also provided on the GIS DVD provided with the report. The GIS map is inter-active for the purpose of identifying stream segment and monitoring locations.

- This section is intended to be a general overview of water quality concerns in the region and but does not include a detailed evaluation of these issues.
- 4. Watershed Initiatives
  - The information in this section was updated by the respective Basin Coordinators and includes a general overview of the watershed activities in the region and the Association's participation and support of these activities.
  - A map showing the regional monitoring sites was also added to this section.
- 5. Basins
  - This section includes a listing, by basin, of all the Wastewater Management and/or Operating Agencies in the region.
  - The language for each responding entity has been updated to reflect the most current information provided to the Association including the current status of each treatment system and the long-range plans that are in place.
- 6. Data Sheets and Service Area Maps
  - This section includes an alphabetical listing of each of the Wastewater Management and/or Operating Agencies.
  - Each of the agencies data sheet has been updated to reflect the most current information provided to the Association regarding facility needs, location, level of treatment, capacity, timing of facility expansions, and population projections.
  - Included 208 Wastewater Utility Service Area (WUSA) maps have either not changed from previous report or have been updated to reflect the boundary for which the operating entity will be responsible to provide wastewater service within the foreseeable future. (see date on each map).
- 7. Appendices
  - Appendices A-D includes the current policies and guidance utilized by the Association.
    - Note that in 2012, the NFRWQPA revised the Utility Planning Guidance Policy to include requirements for "Green Elements" in the planning process. Utility Plans submitted must now reference efforts to implement Green Elements. In 2015, the NFR revised the Outline for the Utility Planning Report.
  - Appendix E, 208 Planning Requirements, was included as a reference for required elements of a 208 Plan.
  - Appendix F, which is the 208 GIS data, has been updated to include all changes to the WUSA boundaries since the 2013 Update.

The process for directly collecting the update information took place over a six month period. Each entity is contacted and requested to provide updates and current information on their respective permits. Some of the specific information from the Wastewater Management / Operating Agencies is already available to the Association as part of the Utility Plans developed by these agencies and approved by the Association over the last few years. In 2007 the Association established a Utility Plan Policy that requires all public wastewater treatment agencies which are submitting a site application, plan amendment request, or forming a district to have an accepted or conditionally accepted Utility Plan in place prior to formal consideration of the request by the Association.

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Following the collection of the updated information, the process for consideration and approval of the information by the Association began. The update information was first presented to the Association as a proposed plan amendment in May 2016. In keeping with the Association's adopted Plan Amendment Process, this proposed plan amendment information was posted on the website where it was available for review during a 60 days comment period. During this period comments were received from several of the operating agencies listed in the plan. These comments included additional updated information which had not previously been provided to the Association during the initial requests for information.

At a regular meeting held in July 2016, the Association discussed the proposed changes to the 208 Plan as part of the 2016 Update and the comments which had been received. As with all Association meetings, notice of this meeting was sent out to a broad e-mail list which included member entities as well as all other parties who have requested to be included on our notification list. There were no concerns raised regarding with the proposed changes, including those proposed as the result of comments received.

A public hearing was then held on August 22<sup>nd</sup>, 2013 to consider the 2016 Update. Notice of the hearing was sent out to a broad e-mail distribution list as well as being published in local newspapers. No comments were received at the Public Hearing and the Association approved the 2016 Update.

This 2016 Update is now being presented to the Commission for consideration. We feel that development of the updated report was a very open and thorough process used by the Association to consider all the updated information and the comments received. The Updated 208 Plan reflects the mission of the Association which is 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." The Association requests approval of the 2016 Update and would like to thank the Commission for their time and consideration. Please feel free to contact me at (970) 962-2785 should you have any questions.

Sincerely,

Warren Mesloh PE  
Manager

Enclosure – 1

cc: John Holdren, Chair, North Front Range Water Quality Planning Association  
Tammy Allen, CDPHE – Restoration & Protection Unit