

Town of Wellington Wastewater Treatment Plant Expansion Project Environmental Assessment



Prepared for:
Colorado Department of Health and Environment, Grants & Loans

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COLORADO
Department of Public
Health & Environment

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition
ACS	American Community Survey
AFY	Acre Feet Per Year
APCD	Air Pollution Control Division
APE	Area of Potential Effects
APEN	Air Pollution Emission Notice
AQS	Air Quality System
ATAD	Autothermal Thermophilic Aerobic Digestion
BMPs	Best Management Practices
CAS	Conventional Activated Sludge Basins
CDA	Colorado Department of Agriculture
CDPHE	Colorado Department of Public Health and Environment
CDPS	Colorado Discharge Permit System
CFR	Code of Federal Regulations
cfs	Cubic Feet Per Second
CLOMR	Conditional Letters of Map Revision
CNHP	Colorado Natural Heritage Program
CO	Carbon Monoxide
CPW	Colorado Parks and Wildlife
CWA	Clean Water Act
DOLA	Colorado Department of Local Affairs
DWR	Department of Water Resources
EA	Environmental Assessment
EJ	Environmental Justice
ESA	Endangered Species Act
FDP	Flood Development Permit
FEMA	Federal Emergency Management Authority
FIRM	Flood Insurance Rate Maps
FNSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FT	Federal Threatened
GMA	Growth Management Area
IGA	Intergovernmental Agreement
IPaC	Information for Planning and Consultation
lb/hr	Pounds Per Hour
lb/yr	Pounds Per Year

Acronym or Abbreviation	Definition
LEP	Limited English Proficiency
LOMR	Letter of Map Revision
MBTA	Migratory Bird Treaty Act
mgd	Million Gallons Per Day
n.d.	No Date
NAAQS	National Ambient Air Quality Standards
NFIP	National Flood Insurance Program
NO ₂	Nitrogen Dioxide
NPIC	North Poudre Irrigation Company
NRHP	National Register of Historic Places
O ₃	Ozone
OAHP	Office of Archaeology and Historic Preservation
Pb	Lead
PM _{2.5}	Particulate matter less than 2.5 microns
PM ₁₀	Particulate matter less than 10 microns
SC	State Special Concern
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SPWRAP	South Platte Water Related Activities Program
SRF	State Revolving Fund
ST	State Threatened
ton/yr	Tons Per Year
U.S.	United States
EPA	U.S. Environmental Protection Agency
U.S.C.	United States Code
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
UV	Ultraviolet
VOC	Volatile Organic Compounds
WUS	Waters of the U.S.
WWTP	Wastewater Treatment Plant

1 Summary

1.1 Project Identification

Applicant: Town of Wellington

Address: 3735 Cleveland Avenue, Wellington, Colorado 80549

Project No.: WXXZ2950

1.2 Contact Person

Ms. Patti Garcia, Town Administrator

3735 Cleveland Avenue

P.O. Box 127

Wellington, Colorado 80549

1.3 Abstract

The Town of Wellington is planning to improve their wastewater treatment plant (WWTP) located at 6190 NE Frontage Road, Wellington, Colorado. The plant is nearing its capacity, will need to meet more stringent regulations for effluent discharge in the near term, and the original facilities are aging. Proposed improvements would increase the plant capacity from 0.9 million gallons per day (mgd) to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence to the west side of the Town's WWTP property limit. All proposed improvements would occur within the Town's existing property for the WWTP (project area) (Figure 3-2).

Costs to construct the proposed improvements are estimated between \$41 and \$46 million. The Town investigated strategies to fund construction of the proposed project. The Town will apply for a loan from the State Revolving Fund (SRF) Program administered by CDPHE (the Town will pay the engineering fees for the proposed project from their sewer fund). With the proposed changes in the rate schedule described below, it is anticipated that the loan will be repaid by 2037. Terms of the loan will be finalized after construction costs are finalized and the Town files the formal loan application in January 2022.

The proposed rate changes include increasing the residential tap fee from \$7,500 to \$9,700 with an annual increase of \$300.00 programmed for the next 20 years. The residential sewer base rate would initially be increased from \$20.63 to \$36.00 per month, with a yearly \$2.00 increase to a maximum base rate of \$45.00 reached in 2026. The usage rate would initially be increased from \$6.50/1,000 gallons to \$13.00/1,000 gallons, with an annual increase of \$2.00 to a maximum rate of \$20.50/1,000 gallons in 2026. These proposed rate increases are subject to change and must be approved by the Town Board of Trustees, which is expected to occur in late 2021.

1.4 Comment Period

In conformance with the requirements of the National Environmental Policy Act and the Colorado Environmental Review Process, a Finding of No Significant Impact (FNSI) will be subject



to a 30-day public review period. The FNSI will be distributed to interested persons and agencies for their review. The FNSI will be available for public review at the Colorado Department of Public Health and Environment. Any comments received will be given due consideration. Comments should be addressed to:

Aly Ulibarri, Project Manager
Water Quality Control Division
Colorado Department of Public Health and Environment
WQCD-OA-B2
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

2 Purpose and Need for Action

The purpose of proposed improvements to the Town of Wellington (Town) WWTP is to address capacity issues resulting from population growth, achieve compliance with more stringent effluent requirements, and replace aged infrastructure. The identified needs of the project are outlined below and detailed in the Town of Wellington Wastewater Treatment Masterplan (Town of Wellington 2020):

- Flows and loads to the plant are nearing its current rated capacity as a result of substantial population growth that has occurred within the Town in the past few years, which is a trend that is expected to continue.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their functions in the future. The facilities will need to be replaced because they cannot be further expanded.

3 Project Summary

The Town's existing WWTP is located southeast of the Town's city limits at 6190 NE Frontage Road, Wellington, Colorado (Figure 3-1). The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million mgd as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project also includes moving the existing fence on the west side of the plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 3-2).

The benefits of the proposed project include creating additional capacity for expected growth; reducing nitrogen and phosphorus concentrations in the effluent, which will reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

While the proposed project is currently under design, the estimated cost to implement the proposed project over the next several years (early 2022 to early 2024) ranges between approximately \$41 and \$46 million (based on a 30 percent cost estimate that includes engineering fees). The Town plans to finance the proposed project through a combination of revenue from its existing sewer fund and a low-interest SRF construction loan.

3.1 Alternatives Analysis

This section summarizes the alternatives evaluated to meet the purpose and need of the project. A No Action Alternative and three build alternatives were evaluated, including Optimize Existing Facility, Consolidate Operations with Nearby Facilities, and Expand and Replace Existing Facilities.

3.1.1 No Action Alternative

A No Action Alternative was evaluated to provide a baseline comparison with the proposed project. Under the No Action Alternative, the Town's WWTP would not be upgraded and expanded, and would operate under its existing capacity. As such, it would not meet the purpose and need of the project because it would not have sufficient capacity to serve the Town's planned growth, it would not meet more stringent wastewater nutrient removal regulations for plant effluent discharge in the near term, and the existing facilities would continue to age.

Figure 3-1: Planning Area

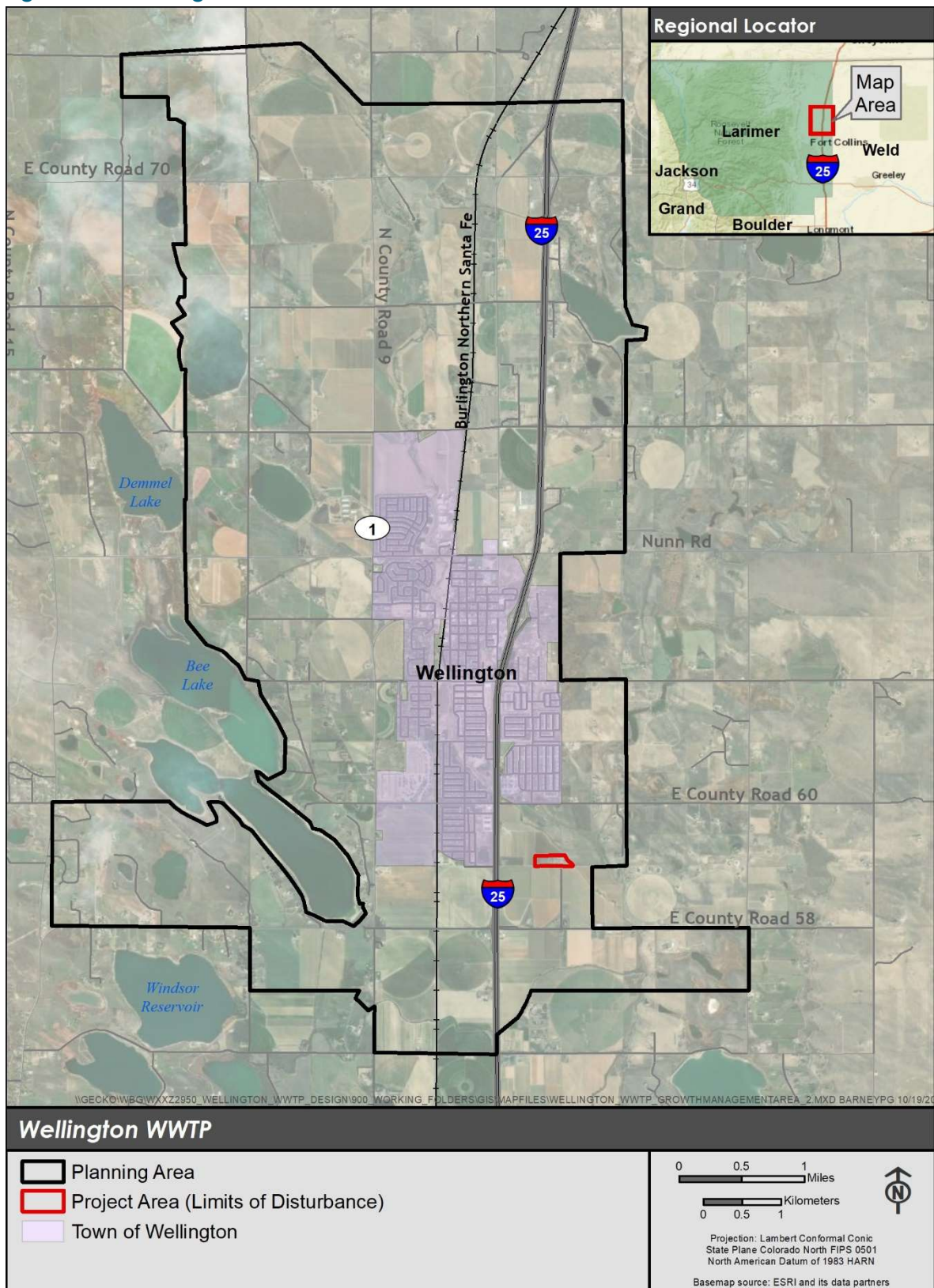
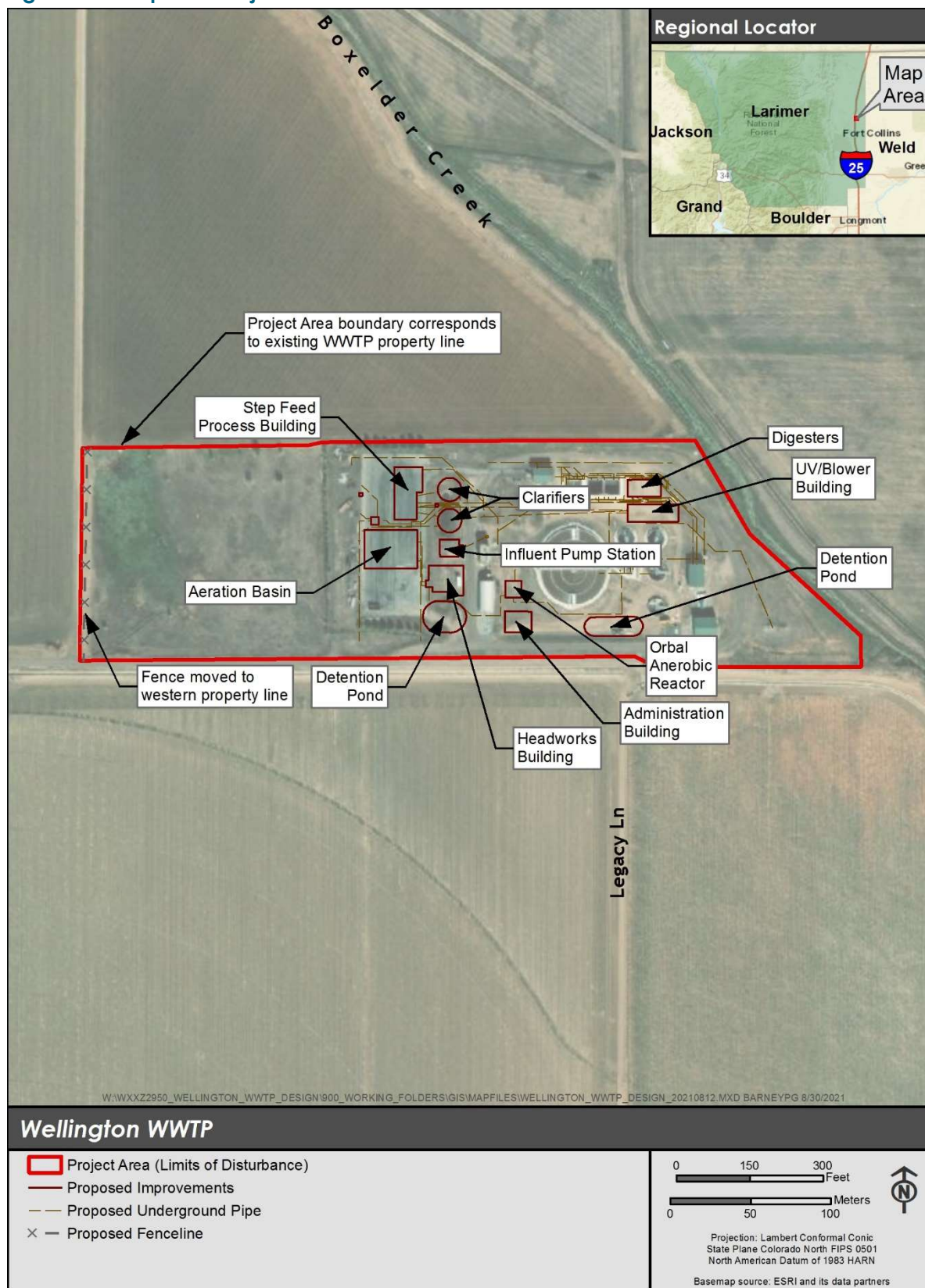


Figure 3-2: Proposed Project



3.1.2 Optimize Existing Facility

This alternative would optimize the existing processes at the WWTP facility. The capacity of the existing processes was evaluated through a process model calibration and validation effort. It was determined that the existing facility cannot be sufficiently optimized to meet the flow and load increases projected over the next 20 years, or to meet the expected Regulation 85 effluent limits. Several facilities, such as the headworks and UV disinfection system, are hydraulically constrained. Options to optimize the WWTP in the interim were evaluated, including in situ de-ragging to increase the active volume of the Orbal®, temporary supplemental aeration, and temporary chlorine addition for filament control to improve settleability. It was determined that these temporary improvements would not increase the load capacity of the plant by more than approximately 10 percent and, therefore, would not address the hydraulic limitations of the current plant. As such, this alternative was dismissed.

3.1.3 Consolidate with Nearby Facilities

This alternative would consolidate WWTP operations with other existing facilities. The nearest facility is Boxelder Sanitation District, which is 8.8 miles from the WWTP. Consolidating WWTP operations with that facility would require installing lengthy collection lines through the Boxelder service area, resulting in substantial costs (\$30 to \$40 million). Further, to meet its own growing needs, the Boxelder Sanitation District recently completed a \$32.7 million expansion of their facility from 3 mgd to 4.6 mgd. Consolidating their facility with the Town's WWTP would take up that newly expanded capacity, requiring an additional expansion of their facility. The next nearest facility is the City of Fort Collins WWTP located across the Poudre River. Collection piping would need to be routed through the Boxelder service area to reach the City of Fort Collins' WWTP, and would require a crossing under the Poudre River, resulting in even higher costs. For these reasons, this alternative was dismissed.

3.1.4 Expand and Replace Existing Facilities

This alternative would expand and replace the WWTP processes to meet future demand. Under this alternative, options for the treatment systems were varied such that a detailed alternative analysis for those systems was warranted.

Secondary treatment system alternatives included:

- A new, larger three- or four-ring Orbal® with surface aeration and two new secondary clarifiers.
- A new conventional activated sludge basin with fine bubble aeration and two new secondary clarifiers.
- A new conventional activated sludge basin with fine bubble aeration, Step Feed capability, and two new secondary clarifiers.

Solids treatment alternatives included:

- Expansion of the existing aerobic digesters
- Autothermal thermophilic aerobic digestion (ATAD)

Figure 3-3 and Figure 3-4 show the proposed layouts for the secondary and solids treatment alternatives, respectively.

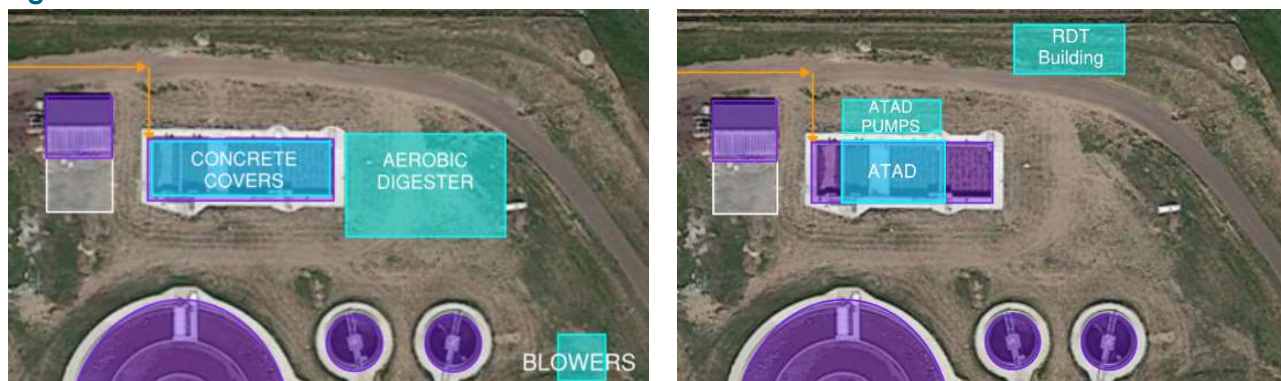
Figure 3-3: Secondary Treatment Alternatives



From left: a new Orbal®, Conventional Activated Sludge basins (CAS), and CAS with Step Feed. The current expansion is shown in teal with future expansions in grey and red.

Source: Wastewater Utility Plan (Jacobs 2021a)

Figure 3-4: Solids Treatment Alternatives



Left: Expansions of existing aerobic digesters. Right: ATAD

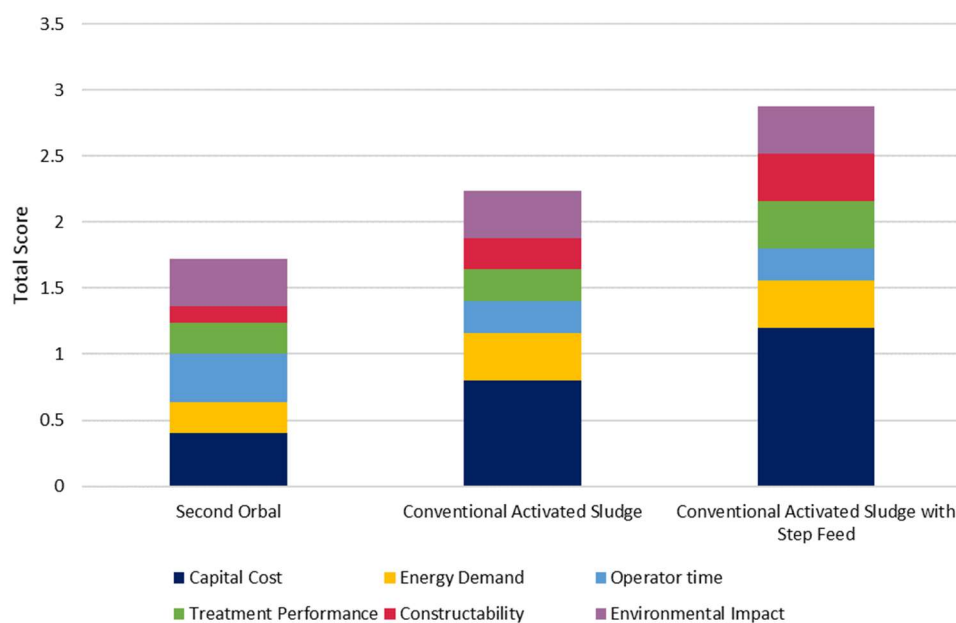
Source: Wastewater Utility Plan (Jacobs 2021a)

Six selection criteria were developed and weighted for the treatment and collection system alternatives analysis (Table 3-1).

Table 3-1 Treatment and Collection System Evaluation Criteria and Weighting

Criteria	Weight
Capital cost: Costs to construct the alternative. Higher scores represent less expensive construction.	40%
Energy costs: Alternatives' annual energy demand. Higher scores represent less energy-intensive operation.	12%
Operator requirements: Complexity of operation and maintenance. Alternatives that reduce demand on operators' time and energy are preferred. Additionally, equipment consistency is preferred for consistent training of new staff. Higher scores require less operator time and fewer operators overall.	12%
Performance with respect to expected preliminary effluent limits: Ability of each alternative to meet treatment requirements consistently and reliably. High scores indicate an alternative's ability to accommodate variable flows and loads, minimize plant upsets, and facilitate redundancy.	12%
Ease of implementation: Constructability of each alternative for the current expansion and the impact on future expansions. Higher scores reflect options that are easier to construct, require minimal footprint, and are easily expanded in the future.	12%
Environmental impact: Impact of a given treatment alternative operation on receiving water, air quality, and greenhouse gas emissions. Higher scores reflect reduced impairment on water and air quality and lower greenhouse gas emissions.	12%

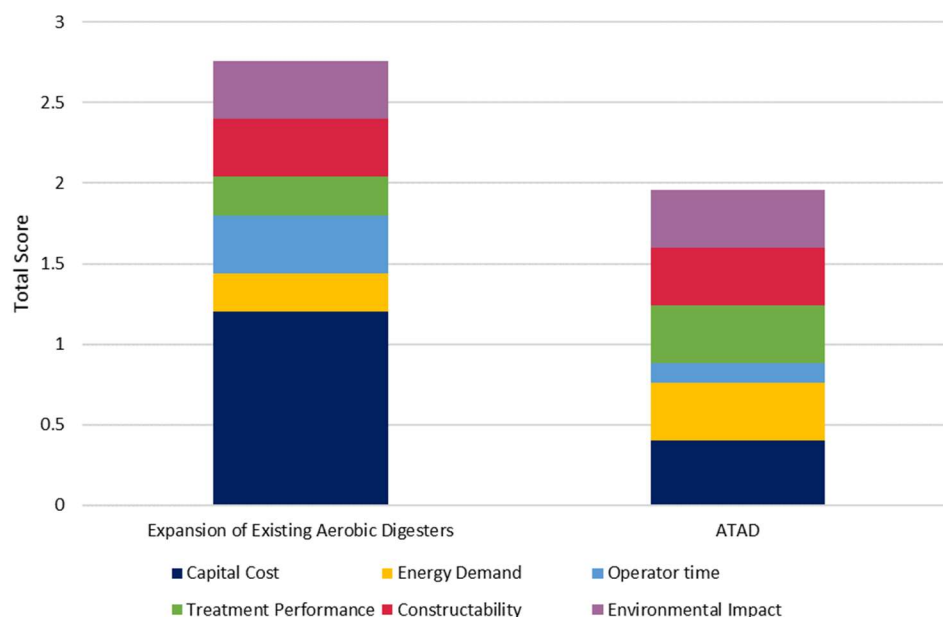
Analysis of the secondary treatment alternatives indicated that the Conventional Activated Sludge With Step Feed alternative scored higher for all six criteria than the Second Orbal and Conventional Activated Sludge alternatives (Figure 3-5).

Figure 3-5: Secondary Treatment Alternative Scoring

Source: Wastewater Utility Plan (Jacobs 2021a)

Analysis of the solids treatment alternatives indicated that the Expansion of Existing Aerobic Digesters alternative scored higher overall than the ATAD alternative (Figure 3-6).

Figure 3-6: Solids Treatment Alternatives Scoring



Source: Wastewater Utility Plan (Jacobs 2021a)

A Net Present Value analysis was conducted, and the results are provided in Table 3-2.

Table 3-2 Summary of Net Present Value Evaluation for Treatment Alternatives

Criteria	Second Orbal®	Conventional Activated Sludge	Conventional Activated Sludge with Step Feed	Expansion of Existing Aerobic Digesters	ATAD
Capital Cost	\$7,344,000	\$6,490,000	\$5,400,000	\$6,680,000	\$9,880,000
Operations and Maintenance Costs	\$241,000	\$183,000	\$183,000	\$196,000	\$247,000
Net Present Value (20 year)	\$10,930,000	\$9,213,000	\$8,123,000	\$9,596,000	\$13,555,000

Source: Wastewater Utility Plan (Jacobs 2021a)

3.2 Proposed Project

The Expand and Replace Existing Facilities alternative was selected as the proposed project, and includes:

- A new headworks building with greater redundancy sized to treat a future peak hour flow of 8.3 mgd.
- A new parallel secondary treatment train with a step feed aeration basin and two secondary clarifiers sized to provide redundancy in the short-term and meet 1.75 mgd maximum month treatment capacity.
- Modifications to the existing Orbal® train to accomplish biological phosphorus removal by adding an anaerobic reactor.
- A new UV facility sized to treat a future peak hour flow of 8.3 mgd.
- Expanded aerobic digestion process to treat increased solids production from increased facility loading.
- A new dewatering facility to provide redundancy and room for future expansion.
- Replacement of the existing non-potable water reuse system with a similar system in the new UV Building. The system would be expanded for reuse water to be used in the locations around the facility, including scum management in existing and new secondary clarifiers, landscaping, screen spray cleaning, screenings conveyance sluice water, and washdown.
- Installation of a new backup power generator to provide the additional power capacity required for the expanded facilities.

The proposed project includes several green elements for energy efficiency, chemical use, and improved receiving water quality, such as the examples below:

- Proposed pumps and blowers would be equipped with variable frequency drives to increase operation efficiency.
- Fine bubble diffusers in the new step feed basin would have higher oxygen transfer efficiency for given electrical demand.
- Dedicated anoxic and anaerobic zones in the step feed basin would facilitate denitrification and biological phosphorus removal without the use of supplemental carbon or metal salts.
- The existing Orbal® train also would have a dedicated anaerobic zone and regions of high and low aeration to promote nutrient removal. Implementation of denitrification to the system would reduce the overall oxygen demand and energy use.
- The lower total nitrogen and total phosphorus effluent would lower the nutrient load on the receiving water.



The existing WWTP plant has no odor control facilities, and there is no current requirement for odor control. None of the proposed treatment options would result in a substantial increase in odor; therefore, odor control facilities are not anticipated to be required.

The Town would be required to apply for a general Industrial Stormwater Discharge Permit coverage pursuant to Colorado Regulation 61 (5 CCR 1002-61), under Sector T, Treatment Works, of the COR900000 CDPS General Permit for Stormwater Discharges Associated With Non-Extractive Industrial Activity. As part of this permit, the Town would be required to prepare a Stormwater Management Plan for the improved WWTP facility. The permit also requires that quarterly inspections be performed and documented, outfall monitoring to be performed, and staff to be trained regarding permit compliance.

The proposed project is shown on Figure 3-2.

4 Affected Environment

4.1 Description of the Town's Planning Area

4.1.1 Town's Planning Area

The Town of Wellington is located in Larimer County in northeastern Colorado. The Town currently comprises approximately 3.5 square miles (2,240 acres), over half of which is currently developed. Urban land uses include residential, commercial, industrial, parks, schools, and roads, making up approximately 2,210 acres. Agricultural and vacant land make up the remaining 990 acres within the Town's limits.

The planning area for this project consists of the Town of Wellington's utility growth management area (GMA), which is the area the Town intends to serve with wastewater utility service at ultimate build-out¹. The GMA includes land within the current Town boundary and adjacent unincorporated Larimer County. Except for large lot, single-family houses, no significant development within the GMA has occurred, and the majority of land is used for agricultural production. Larimer County has zoned land in the Town's GMA as "open" (Larimer County 2021). The GMA encompasses 16,400 acres of land. Future land uses within the GMA are planned to include parks and open space, agriculture, low and medium density residential, downtown neighborhoods, downtown core, commercial, mixed use, industrial/light industrial, and civic uses (Town of Wellington 2021).

4.1.2 Existing Resource Conditions

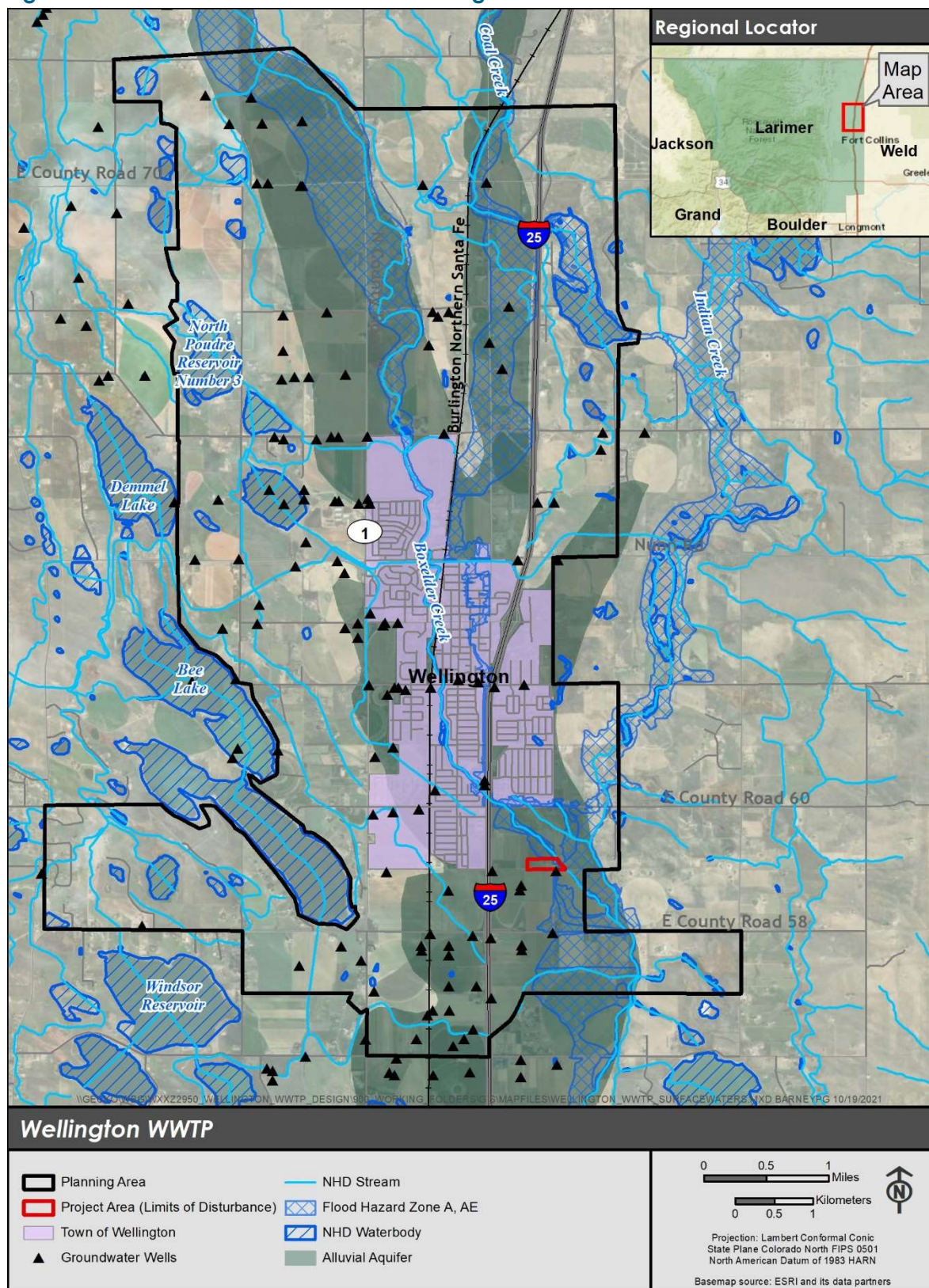
This section describes the existing environmental resources within the project area and planning area.

Surface Water and Groundwater Quality and Quantity

The planning area contains surface water resources such as streams and water bodies, and is part of the South Platte watershed and River Basin (Figure 4-1). The South Platte River Basin is administered by the Department of Water Resources (DWR) as Water Division 1. Boxelder Creek parallels the eastern edge of the project area and receives effluent from the WWTP. According to the U.S. Environmental Protection Agency (EPA), Boxelder Creek is utilized for Agriculture, Aquatic Life Warm Water-Class 2, and Recreation. The waterbody condition for Boxelder Creek is classified as impaired for Aquatic Life Warm Water-Class 2 because of its benthic macroinvertebrates and selenium levels, and also as impaired for Recreation because of the level of *Escherichia coli* (*E. coli*) in the waterway (EPA 2021a).

¹ As described in an October 5, 2021 letter to the North Front Range Water Quality Planning Association included in Appendix B, the Town's utility GMA differs from the GMA defined in the Comprehensive Plan 2021 (Town of Wellington 2021b). The GMA in the comprehensive plan is equivalent to an urban growth boundary, which may or may not receive wastewater utility services.

Figure 4-1: Water Resources within the Planning Area



The Town's water supply is obtained primarily from surface water resources. The Town supplies 2,375 acre-feet per year (AFY) of water via two main sources: the North Poudre Irrigation Company (NPIC) for up to 2,000 AFY from the North Poudre Reservoir Number 3, and three municipal wells augmented under the Cache la Poudre Water User Association Plan. The Town also uses a series of wells for non-potable irrigation of outdoor spaces (Town of Wellington 2019). Some subdivisions within the Town use wells for outdoor irrigation, but all residents use the Town's treated water system for potable water supplies for indoor use (Town of Wellington 2019).

Wetlands

Various laws and regulations are in place to protect wetlands and waterways. The federal Clean Water Act (CWA) was enacted to restore and maintain the chemical, physical, and biological integrity of U.S. waters through the elimination of discharges of pollutants. In support of this goal, the CWA established permit programs to control discharges into waters of the U.S. (WUS) and provided regulatory authority to the U.S. Environmental Protection Agency (EPA) and U.S. Army Corps of Engineers (USACE) to issue permits. Section 404 established a program to regulate the discharge of dredged or fill material into WUS, including wetlands and streams, and requires the issuance of a permit for any activities resulting in such discharge, unless an exemption applies.

According to the CWA (Section 404), the USACE defines wetlands as:

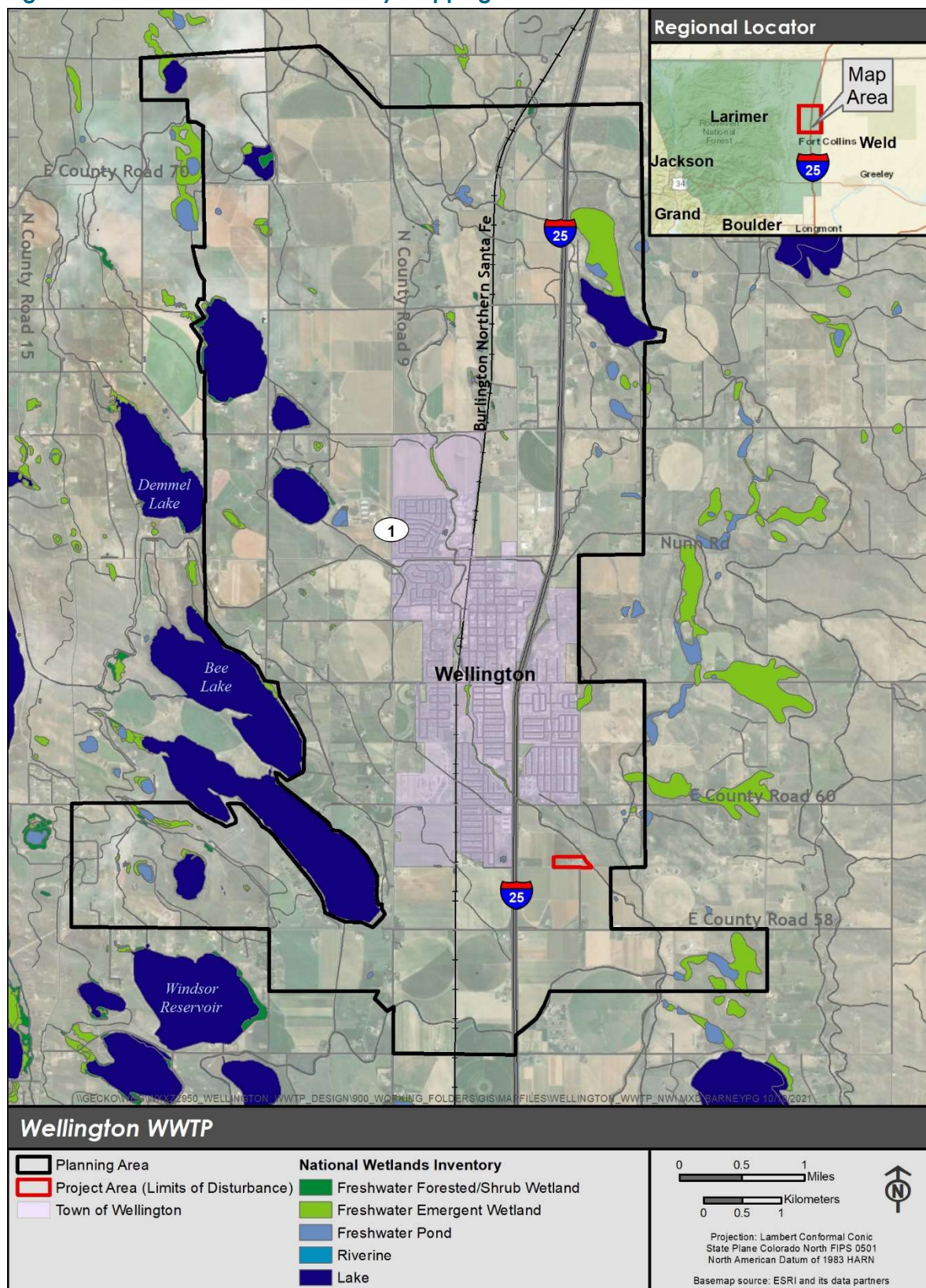
Those areas that are inundated or saturated by surface or ground waters at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas (Code of Federal Regulations [CFR] 328.3, CFR 230.3).

Wetlands occur when all of the following diagnostic environmental characteristics are present:

1. **Vegetation.** The prevalent vegetation consists of macrophytes that are typically adapted to areas having hydrologic and soil conditions that are typically inundated or saturated by surface or ground water. Hydrophytic species, through morphological, physiological, and/or reproductive adaptation(s), have the ability to grow, effectively compete, reproduce, and/or persist in anaerobic (absence of free oxygen) soil conditions.
2. **Soil.** Soils are present and have been classified as hydric, or they possess characteristics that are associated with reducing soil conditions.
3. **Hydrology.** Wetland hydrology indicators provide evidence that the site has a continuing wetland hydrologic regime and that hydric soils and hydrophytic vegetation are not relicts of a past hydrologic regime. Wetland hydrology encompasses all hydrologic characteristics of areas that are periodically inundated or have soils saturated to the surface at some point during the growing season.

Based on a review of the National Wetland Inventory data, the planning area contains numerous streams, reservoirs, irrigation ditches, and wetlands (Figure 4-2). A site visit was conducted in July 2021 to identify the presence of wetlands in and near the project area. No wetlands or waterways are present within the project area; however, Boxelder Creek is located immediately east of the facility and receives the WWTP effluent. The creek is incised, and little wetland vegetation is present along its banks.

Figure 4-2: National Wetland Inventory Mapping.



Floodplains

Floodplains are mapped and regulated by the Federal Emergency Management Agency (FEMA) through the National Flood Insurance Program (NFIP). Floodplains are defined by FEMA as “Any land area susceptible to being inundated by flood waters from any source” (44 CFR 59.1). FEMA identifies floodplain boundaries on Flood Insurance Rate Maps (FIRM), and any subsequent FIRM revisions are adopted by the local jurisdiction(s). To provide a national standard without regional discrimination, the 100-year flood has been adopted by FEMA as the “flood having a one percent chance of being equaled or exceeded in any given year” (44 CFR 59.1).

The 100-year floodplain for the planning area is shown on Figure 4-3. The 100-year floodplains of Boxelder Creek, Indian Creek, and Coal Creek traverse the planning area. The project area is partially within the currently adopted (effective) floodplain for Boxelder Creek (FEMA 2020). The 2013 Colorado floods substantially changed floodplains and flood risks in the planning area. FEMA is evaluating floodplain changes for properties along stream channels within Larimer County, including Boxelder Creek. FEMA issued the preliminary revised Larimer County Flood Insurance Study (FIS) and the Larimer County FIRMs in January 2021 (Colorado Water Conservation Board Department of Natural Resources n.d.). The release date for the effective FIRMs is not known, but is anticipated to occur sometime in 2022 or later (Colorado Water Conservation Board Department of Natural Resources n.d.). In accordance with the Larimer County Engineering Department Floodplain Development Guide and the Larimer County Land Use Code, Larimer County is currently using the most conservative boundary of both the current effective floodplain and the 2021 preliminary floodplain to administer their floodplain development regulations.

Agricultural Lands

The Farmland Protection Policy Act (FPPA) protects farmlands that are considered prime or unique (7 CFR Part 658). The U.S. Department of Agriculture (USDA) defines prime farmland as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. Unique farmlands have specific high-value food or fiber crops. In some areas, land that does not meet the criteria for prime or unique farmland is considered to be “farmland of statewide importance” for the production of food, feed, fiber, forage, and oilseed crops. Generally, this land includes areas of soils that nearly meet the requirements for prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods.

The planning area contains both prime farmland and farmland of statewide importance (Figure 4-4). The Town is surrounded by relatively flat land primarily comprised of active agricultural land, much of which is under conservation easements (Town of Wellington 2021a). Approximately 1,275 acres of agricultural land is located within the Town limits, and approximately 12,404 acres of the approximately 16,400 acres within the planning area are agricultural lands (USDA 2018). The proposed project would occur entirely within the Town’s existing WWTP site, which is designated as “prime farmland, if irrigated” (NRCS 2021). Because the WWTP property is “in or committed to urban development,” it does not meet the definition of farmland as defined in the FPPA. NRCS correspondence dated November 22, 2021 indicates the project is not subject to the FPPA (Appendix B).

Figure 4-3: Existing and Preliminary Floodplains within the Project Area

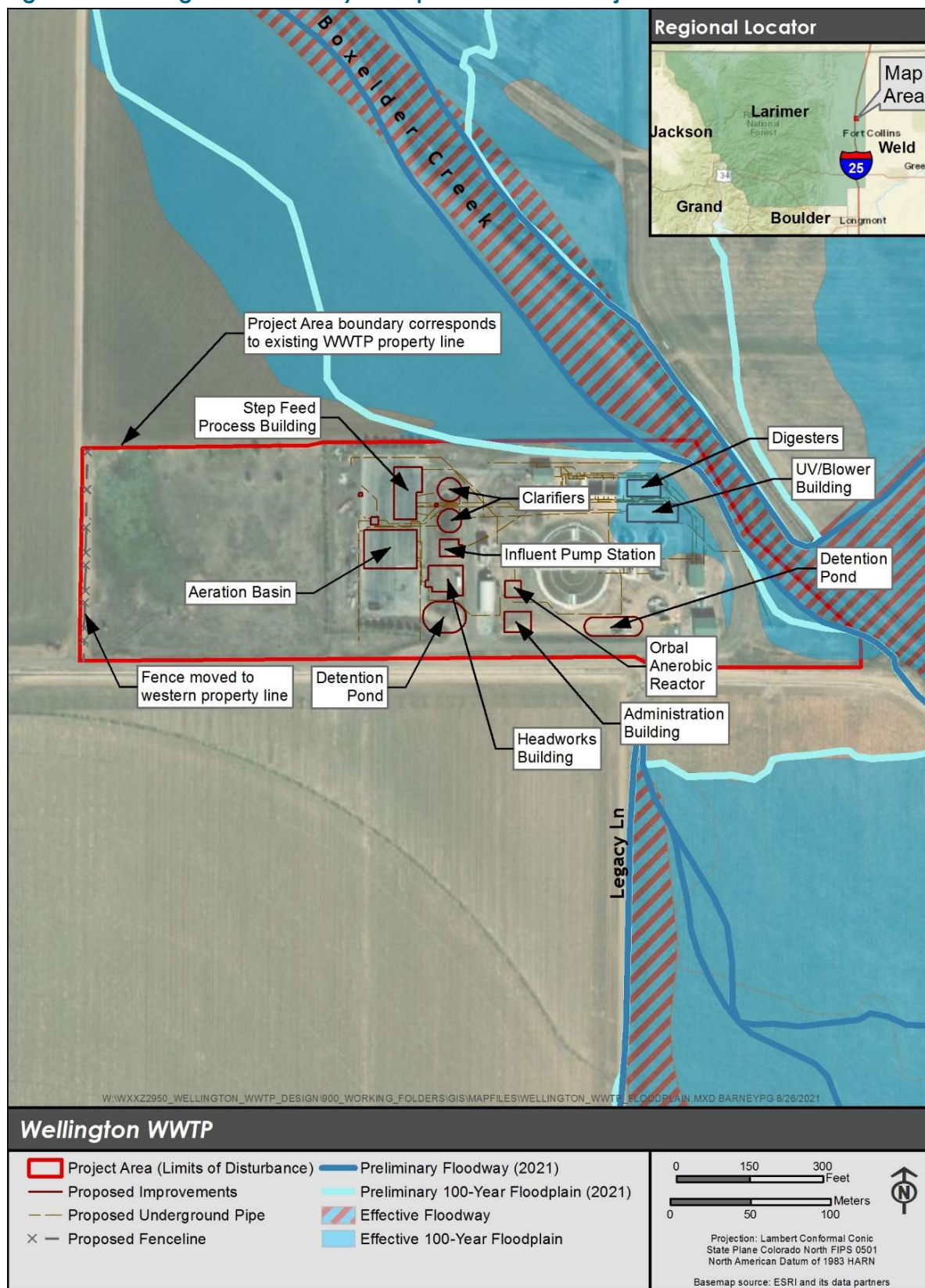
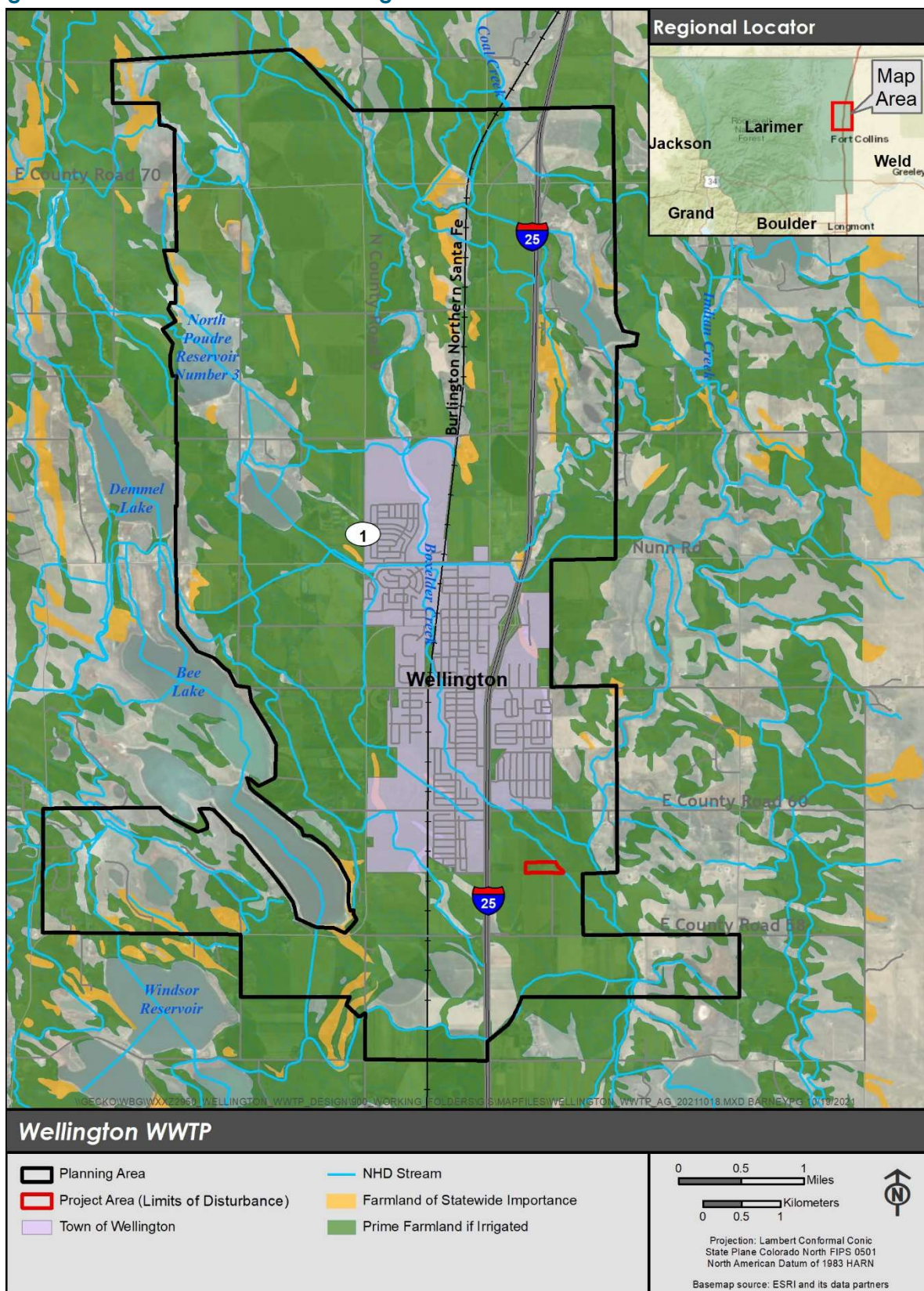


Figure 4-4: Farmland within the Planning Area



Terrestrial and Aquatic Plants and Wildlife

Vegetation and Noxious Weeds

The Town's planning area is located within the Front Range Fans and Flat to Rolling Plains sub-ecoregions, both of which are part of the High Plains ecoregion, as defined by the EPA. The High Plains are drier and occur at a higher elevation than the Great Plains to the east. The native grasslands throughout the ecoregion are dominated by blue grama (*Bouteloua gracilis*) and buffalo grass (*Bouteloua dactyloides*) (Chapman et al. 2006). While isolated areas of native grasslands are present in the planning area, much of the land has been developed for commercial or residential use, or converted to agricultural fields, parks, and roads.

A site visit was conducted in July 2021 to assess vegetation conditions in the project area. Overall, natural habitat is lacking throughout the project area, which is heavily developed by the WWTP facility. Consequently, native vegetation within the project area is limited, and much of the non-developed areas contain ruderal vegetation, specifically invasive or noxious species. The land immediately surrounding the WWTP facility has largely been converted to agricultural use and, therefore, also contains little native or natural vegetation. The topography within and adjacent to the WWTP is relatively flat, with little topographical variation. The elevation of the project area is approximately 5,140 feet above mean sea level.

Under the Colorado Noxious Weed Act, state-designated noxious weeds are categorized as high-priority (List A), medium-priority (List B), low-priority (List C), or Watch List weeds (Colorado Department of Agriculture [CDA] 2020b). Per this Act, List A weeds must be eradicated, List B weeds must be treated and controlled to prevent spread based on county weed control priorities, and List C weeds are low-priority weeds requiring control and education to prevent further spread. Watch List weeds are those that should be tracked and reported, but control is not required (CDA 2020a, 2020b).

Noxious weeds observed during the July 2021 site visit included one List B species (Canada thistle [*Cirsium arvense*]), and three List C species (downy brome [*Bromus tectorum*], field bindweed [*Convolvulus arvense*], and puncturevine [*Tribulus terrestris*]). Exotic species are also present within the project area and the planning area, most notably Russian thistle (*Salsola* sp.) and kochia (*Bassia scoparia*). Although the exotic species do not require management under the Colorado Noxious Weed Act, they can spread into naturalized areas that are disturbed by construction activities and degrade natural environments.

Wildlife

The existing WWTP site is fenced and has been previously disturbed. As such, native grassland habitat is lacking and of poor quality. Consequently, the use and general occurrence of wildlife in the project area is uncommon. The land beyond the WWTP within the planning area largely consists of agriculture lands, shrublands, and grasslands, with areas of developed land and roadways. Because of the alteration of natural habitat that has occurred, wildlife potentially found throughout the planning area include species that are relatively common and widespread throughout the region. As such, mammals that likely occur in the planning area include raccoon (*Procyon lotor*), red fox (*Vulpes vulpes*), coyote (*Canis latrans*), striped skunk (*Mephitis mephitis*), eastern cottontail rabbit (*Sylvilagus floridanus*), black-tailed jackrabbit (*Lepus californicus*), deer mouse (*Peromyscus maniculatus*), and vole (*Microtus* spp.).

The project area is within the overall range for mule deer (*Odocoileus hemionus*) and white-tailed deer (*Odocoileus virginianus*). The planning area is within pronghorn (*Antilocapra americana*) range, as mapped by Colorado Parks and Wildlife (CPW). White-tailed deer and mule deer occur along the Front Range and eastern plains of Colorado, and may occur within agricultural fields, parks, and riparian corridors within the planning area. Pronghorn are likely to be more uncommon in the planning area because, in Colorado, they commonly occupy the grasslands of the Eastern Plains and shrublands west of the mountains (CPW 2021).

Migratory Birds Including Raptors

Most native bird species (birds naturally occurring in the U.S.) are protected by the Migratory Bird Treaty Act (MBTA) (USFWS 2020). The MBTA is a federal statute (16 United States Code [USC] Title 16 Section 703 et. seq.) under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) intended to protect migratory birds. The MBTA provides protection to 861 species based on the most recent revised list (USFWS - 50 CFR Part 10). The MBTA stipulates that it is unlawful to pursue, hunt, take, capture, or kill; attempt to take, capture, or kill; possess, offer to sell, barter, purchase, or deliver; or cause to be shipped, exported, imported, transported, carried, or received any migratory bird, part, nest, egg, or product, manufactured or not. In Colorado, most birds, except for the European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), rock pigeon (*Columba livia*), and grouse/pheasant species (order Galliformes), are protected under MBTA Sections 703-712. The MBTA stipulates that it is unlawful to destroy an active migratory bird nest, nestling, or eggs. The USFWS allows vacant nests to be destroyed, but active nests with birds, their young, or eggs must be left undisturbed (USFWS 2020).

Similar to the reasons discussed regarding general wildlife habitat, migratory bird habitat is present in vegetated areas, but overall is lacking in the project area. Because vegetation is mowed within the WWTP site, nesting is highly unlikely due to the frequent disturbance. Bird habitat is more abundant and diverse across the planning area (i.e., agricultural fields, grasslands, waterways, wetlands, riparian areas, etc.). Typical bird species in the planning area include American crow (*Corvus brachyrhynchos*), American robin (*Turdus migratorius*), black-billed magpie (*Pica hudsonia*), mourning dove (*Zenaida macroura*), European starling (*Sturnus vulgaris*), rock pigeon (*Columba livia*), and numerous sparrows.

Raptor species with the potential to occur in the planning area include those that are relatively common in the region, such as American kestrel (*Falco sparverius*), bald eagle (*Haliaeetus leucocephalus*), great horned owl (*Bubo virginianus*), northern harrier (*Circus cyaneus*), Prairie falcon (*Falco mexicanus*), red-tailed hawk (*Buteo jamaicensis*), Swainson's hawk (*Buteo swainsoni*), and turkey vulture (*Carthartes aura*). Overall, suitable raptor nesting habitat is lacking in the immediate area surrounding the project area because few trees are present in those areas.

Amphibians and Reptiles

According to CPW information (CPW 2018, 2021), amphibian and reptile species that may occur within the planning area include, but are not limited to, bullsnake (*Pituophis catenifer*), woodhouse's toad (*Bufo woodhousii*), collared lizard (*Crotaphytus collaris*), painted turtle (*Chrysemys picta*), milksnake (*Lampropeltis triangulum*), North American racer (*Coluber constrictor*), plains garter snake (*Thamnophis radix*), plains spadefoot toad (*Spea bombifrons*), prairie/plateau fence lizard (*Sceloporus undulatus*), and western rattlesnake (*Crotalus viridis*). Amphibians likely do not occur or are rare within the project area because of the lack of

aquatic habitat and the level of disturbance that has occurred. Although reptiles may be more common as they may forage on site and use the gravel and exposed areas to capture heat, they are still likely uncommon.

Fisheries

Numerous perennial waterbodies occur within the planning area, including creeks, ponds, reservoirs, and lakes. A variety of fish species likely occur within these features, such as rainbow trout (*Oncorhynchus mykiss*), brown trout (*Salmo trutta*), largemouth bass (*Micropterus salmoides*), bluegill (*Lepomis macrochirus*), green sunfish (*Lepomis cyanellus*), and channel catfish (*Ictalurus punctatus*), as well as various minnow and sucker species. No fisheries are located within the project area because no open water habitats are present.

Federally-Listed Species

The primary federal law protecting threatened and endangered species is the Endangered Species Act (ESA) (16 USC Section 1531, et seq). This Act and subsequent amendments provide for the conservation of endangered and threatened species and the ecosystems upon which they depend. Plant and wildlife species have been listed under the ESA as threatened or endangered or have been proposed to be listed as threatened or endangered, because of declining or limited populations. Under Section 7 of the ESA, federal agencies are required to consult with the USFWS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or destroy or adversely modify designated critical habitat. Critical habitat is defined as geographic locations critical to the existence of a threatened or endangered species.

On June 17, 2021, Jacobs requested a list of threatened and endangered species and/or critical habitat that may be present in the planning area using the USFWS's Information for Planning and Consultation (IPaC) online system (Appendix A). Table 4-1 presents the threatened and endangered species from the IPaC list that may be located within the project area and could potentially be affected by the proposed project or may be impacted by project-related water depletions downstream in the Platte River system.

Table 4-1: Federal ESA-Listed Species that may be Affected by the Proposed Action

Species ²	Status	General Habitat Association	Habitat in Project Area	Habitat in Planning Area
Birds				
Eastern black rail (<i>Laterallus jamaicensis</i> ssp. <i>jamaicensis</i>)	Endangered	Wetland dependent, primarily associated with herbaceous, persistent, emergent wetland plant cover. Requires dense overhead cover and moist to saturated soils (occasionally dry) and scattered with or adjacent to shallow water (USFWS 2019).	No, habitat is not present.	No, habitat is not present.
Piping plover* (<i>Charadrius melodus</i>)	Threatened	In Colorado nest on sandy lakeshore beaches, sandbars in riverbeds, or even sandy wetland pastures (CPW 2021). Downstream Platte River system.	No, habitat is not present.	No, habitat is not present.

² The four species indicated with an asterisk occur downstream of the project area and could be impacted by projects that would result in water-related activities in the Platte River Basin

Table 4-1: Federal ESA-Listed Species that may be Affected by the Proposed Action

Species ²	Status	General Habitat Association	Habitat in Project Area	Habitat in Planning Area
Whooping crane* (<i>Grus americana</i>)	Endangered	Mudflats around reservoirs and in agricultural areas. Nesting grounds are wetland communities dominated by bulrush (CPW 2021). Downstream Platte River system.	No, habitat is not present.	No, habitat is not present.
Mammals				
Canada lynx (<i>Lynx canadensis</i>)	Threatened	Found in dense subalpine forest and willow-choked corridors along mountain streams and avalanche chutes (CPW 2021).	No, habitat is not present.	No, habitat is not present.
Preble's meadow jumping mouse (<i>Zapus hudsonius preblei</i>)	Threatened	Well-developed riparian habitat with adjacent, relatively undisturbed grassland communities and a nearby water source between 4,650 to 7,600 feet elevation (USFWS 2016).	No, habitat is not present.	Yes, areas of suitable habitat present.
Fishes				
Greenback cutthroat trout (<i>Oncorhynchus clarkii stomias</i>)	Threatened	Steep, cold, gravely headwater streams and high-mountain lakes (CPW 2021).	No, habitat is not present.	No, habitat is not present.
Pallid sturgeon* (<i>Scaphirhynchus albus</i>)	Endangered	Bottom-oriented, large river obligate fish of the Missouri and Mississippi rivers and some tributaries (USFWS 2021). Downstream Platte River system.	No. Habitat is not present.	No, habitat is not present.
Flowering Plants				
Ute ladies'-tresses orchid (<i>Spiranthes diluvialis</i>)	Threatened	Sub-irrigated alluvial soils along perennial stream terraces, oxbows, and in open meadows in floodplains at elevations between 4,300 and 6,850 feet (Fertig et al. 2005).	No, habitat is not present.	Yes, areas of suitable habitat present.
Western prairie fringed orchid* (<i>Platanthera praeclara</i>)	Threatened	Downstream Platte River system.	No, habitat is not present.	No, habitat is not present.

Source: USFWS IPaC Resource List (Appendix A)

State Listed Species and Species of Concern

Colorado special status species (such as state threatened, state endangered, and state special concern) potentially occurring within the project area and planning area were determined through a review of species lists and habitat associations from CPW (CPW 2021), CPW Species Activity Mapping (CPW 2018), and results of the July 2021 site visit. Table 4-2 presents the

Colorado special status species that may occur within the Town's planning area and the project area.

Table 4-2: Colorado Special Status Species Potentially Occurring in the Planning Area and Project Area

Species	Status	General Habitat Association	Habitat in Project Area	Habitat in Planning Area
Amphibians				
Northern leopard frog (<i>Rana pipiens</i>)	SC	Wet meadows and the banks and shallows of marshes, ponds, lakes, reservoirs, streams, and irrigation ditches.	No, wetlands and waterways are present.	Yes, aquatic habitats are present.
Birds				
Bald eagle (<i>Haliaeetus leucocephalus</i>)	SC	Seldom seen far from water, such as large rivers, lakes, and seacoasts. In Colorado, often occur near reservoirs and along major rivers.	No, habitat is not present.	Yes, Town is in winter range and nesting has been documented in the region.
Ferruginous hawk (<i>Buteo regalis</i>)	SC	Flat and rolling terrain in grassland or shrub steppe. In winter, they use open farmlands, grasslands, deserts, and other arid regions.	No, habitat is not present.	Yes, habitat present within agricultural fields and grasslands.
Long-billed curlew (<i>Numenius americanus</i>)	SC	Grassland species, but they are rarely observed far from water. In Colorado, they are usually associated with ponds, reservoirs, playas, and wet meadows.	No, habitat is not present.	No, habitat not likely present within town but is to the east.
Mountain plover (<i>Charadrius montanus</i>)	SC	Prairie grasslands, arid plains, and fields.	No, habitat is not present.	Yes, habitat present within agricultural fields and grasslands.
Peregrine falcon (<i>Falco peregrinus</i>)	SC	Open spaces usually associated with high cliffs and bluffs overlooking rivers and coasts.	No, habitat is not present.	Yes, nesting unlikely although species may forage in the area.
Western burrowing owl (<i>Athene cunicularia</i>)	ST	Dry, open areas with short grasses and no trees. They nest and live in underground burrows created by prairie dogs, ground squirrels, and badgers.	No, prairie dog colonies are not present.	Yes, prairie dog colonies present.
Mammals				
Black-tailed prairie dog (<i>Cynomys ludovicianus</i>)	SC	Shortgrass to mid-grass prairies on flats or shallow slopes.	No, prairie dog colonies are not present.	Yes, habitat is present and species likely to occur.

Table 4-2: Colorado Special Status Species Potentially Occurring in the Planning Area and Project Area

Species	Status	General Habitat Association	Habitat in Project Area	Habitat in Planning Area
Preble's meadow jumping mouse (<i>Zapus hudsonius preblei</i>)	FT/ST	Well-developed riparian habitat with adjacent, relatively undisturbed grassland communities and a nearby water source between 4,650 to 7,600 feet elevation (USFWS 2016).	No, well-developed riparian habitat not present.	Yes, riparian and stream habitats are present.
Swift fox (<i>Vulpes velox</i>)	SC	Shortgrass and mid-grass prairies with flat or gently sloping topography.	No, habitat is not present.	No, however planning area in proximity to mapped species range.
Reptiles				
Common garter snake (<i>Thamnophis sirtalis</i>)	SC	Marshes, ponds, and the edges of streams. Restricted to aquatic, wetland, and riparian habitats along the floodplains of streams; seldom found away from water or at isolated ponds.	No, habitat is not present.	Yes, wetland, riparian, and stream habitats are present.

Sources: CPW 2021, 2018

Notes:

FT = Federal Threatened

SC = State Special Concern

ST = State Threatened

Cultural, Historical, and Archaeological Resources

Historic properties are protected under Section 106 of the National Historic Preservation Act of 1966 (as amended) and other statutes. Section 106 requires federal agencies to take into account the effects that their undertakings have on historic properties, which are properties that are listed on, or eligible for listing on, the National Register of Historic Places (NRHP).

The proposed project utilizes federal funds through a U.S. EPA loan; therefore, an assessment of effects to historic properties under Section 106 was required. In accordance with Section 106, and for the purposes of this EA, historic properties include any NRHP listed or NRHP eligible prehistoric site; or district, site, building, structure, or object. In order to evaluate project effects to historic resources, Jacobs staff conducted desktop research in June 2021, which is summarized below and detailed in the July 2021 *Cultural Resources Research for Wellington Wastewater Treatment Plan Improvements Memorandum* (Cultural Resources Memorandum) (Appendix B).

The Colorado Office of Archaeology and Historic Preservation (OAHP) Compass database was searched to identify previously evaluated historic resources within the planning area³ that may experience cumulative effects from the proposed project. The Compass database revealed 35

³The Town's adopted 2014 Comprehensive Plan growth management area (GMA) was used as the planning area for Section 106 consultation. After completion of Section 106 consultation, the Town confirmed that the planning area for this project consists of the Town's utility GMA, which is the area that the Town intends to serve with wastewater utility service at ultimate build-out.

sites that have been previously evaluated for NRHP eligibility within the planning area (see Table 1 of the Cultural Resources Memorandum). Of the 35 sites, two are listed on the NRHP, three are officially eligible for the NRHP, three are field eligible, two require more data, and the remainder are either field not eligible or officially not eligible for the NRHP.

Using the Compass search results, as well as a search of the Larimer County Assessor website, Google maps, and Google Streetview, an Area of Potential Effects (APE) was established to identify historic or potentially historic resources that may be directly or indirectly affected by the proposed project (Figure 4-5). The APE encompasses the project area, adjacent parcels, and three sites previously evaluated by the State Historic Preservation Officer (SHPO) for NRHP eligibility, including the NRHP-listed Bee Farm (5LR.1917) and two sites determined not eligible for the NRHP (Kesterson Farm [5LR.11402] and Kerbel Residence [5LR.11403]). The APE also encompasses two parcels containing structures that are at least 45 years old within viewing distance of the project area that have not been previously evaluated for NRHP eligibility.

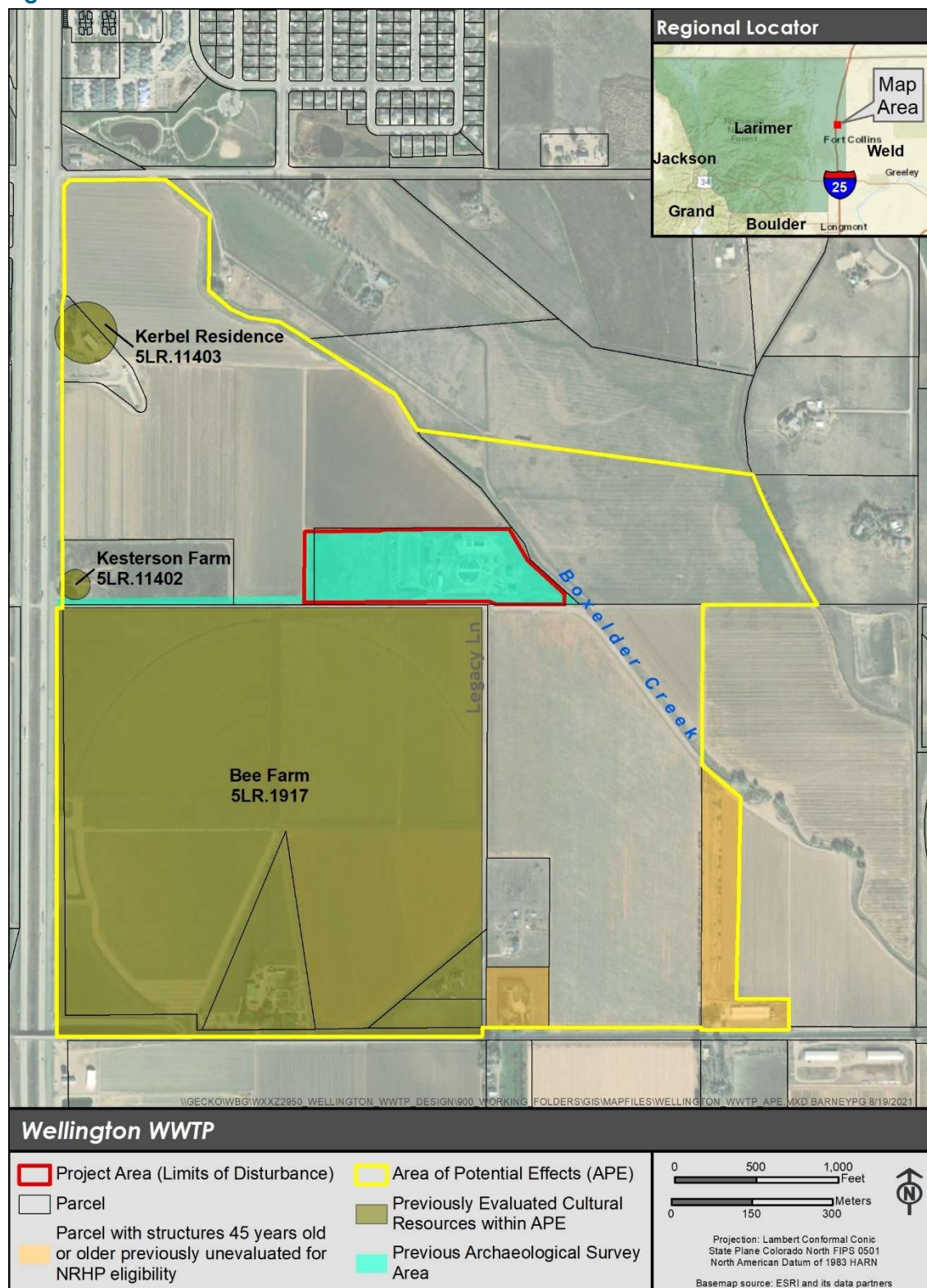
It was determined in consultation with the SHPO that no field surveys were required based on desktop research results and the project scope. Therefore, the Kesterson Farm and Kerbel Residence were not reevaluated for NRHP eligibility under this study. Those two properties, as well as the two properties with structures at least 45 years of age, were assumed to be NRHP eligible for purposes of this evaluation. The APE has been previously disturbed by agricultural operations. The majority of the APE has not been previously surveyed for cultural resources. The entire project area is disturbed and has been previously surveyed, with no cultural resources identified therein. Therefore, it is unlikely that previously unidentified historic architectural or archaeological resources are located therein. In summary, the APE contains one NRHP-listed resource and four potentially NRHP-eligible resources.

On behalf of the Town of Wellington, Jacobs consulted with the SHPO on the research methodology, APE, and recommendation that no field surveys would be required for this undertaking in a letter dated July 9, 2021. The SHPO provided agreement in their letter received on July 23, 2021. Referenced correspondence is provided in Appendix B.

Air Quality

The EPA establishes national ambient air quality standards (NAAQS) for six common pollutants, also called criteria air pollutants, to protect public health. These six criteria air pollutants are ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). Nine counties in the Denver Metro/North Front Range, including Larimer County, are currently in nonattainment for the 8-hour ozone standards. In 2019, the Denver Metro/North Front Range area's classification was changed from a Moderate Nonattainment area to a Serious Nonattainment area by the EPA under the 2008 O₃ standard for not reaching required O₃ reductions.

Figure 4-5: Area of Potential Effects



The Air Pollution Control Division (APCD) of the CDPHE monitors air quality in Colorado. APCD operates 44 air quality and meteorological monitoring stations statewide (CDPHE APCD 2020). No air quality monitoring stations are located within the planning area or project area. The closest monitoring station to the planning area is Air Quality System (AQS) site number 08-069-0009 Fort Collins – CSU, which had no exceedances for O₃ documented in the most current Air Quality Data Report (CDPHE APCD 2020). The Colorado Air Quality Control Commission is appointed by the governor and authorized by the Colorado General Assembly to oversee Colorado's air quality program according to the Colorado Air Pollution Prevention and Control Act, Section 25-7-101 et seq., C.R.S., as amended. The Commission is responsible for developing a State Implementation Plan (SIP), which is “a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the Clean Air Act” (EPA 2021b). No applicable SIP exists for the planning area (CDPHE 2021).

Environmental Justice

The EPA defines environmental justice (EJ) as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” This goal is achieved when everyone has “the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work” (EPA n.d.).

The demographics of the Town and the planning area were reviewed relative to Larimer County and the state. Seven Census block groups fall within or partially within the planning area. Data reviewed included race, household income, and limited English proficiency (LEP) households from the 2015 – 2019 American Community Survey (ACS) five-year estimates (Census 2020a, 2020b, 2020c, 2020d). Averages for the state, County, planning area, and Town are provided in Table 4-3. On average, the Town and the planning area have lower concentrations of minority populations and low-income households than the state and County; however, the Town has a higher concentration of LEP households than the County or state.

Table 4-3 Environmental Justice Populations in the Planning Area, County, and State

Criteria	Town of Wellington	Planning Area	Larimer County	State of Colorado
Minority population	6%	4%	9%	16%
Low-income households	6%	6%	16%	18%
Limited English proficient households	6%	1%	1%	2%

Sources: U.S. Census Bureau 2020a, 2020b, 2020c, 2020d

The seven Census block groups in the planning area also were reviewed individually to determine if they have concentrations of minority, low-income, or LEP populations greater than 50 percent or greater than the County or state. No block groups have concentrations of these populations above 50 percent. Census Block Group 4 of Census Tract 25.02 comprises

approximately 38 percent low-income households and 10 percent LEP households, which exceeds the concentrations in Larimer County and Colorado (see Table 3-2). This block group is near the center of the Town between Cleveland Avenue and Washington Avenue, west of I-25. This area is mostly developed with residential, commercial, and civic land uses.

4.2 Population and Flow Projections

4.2.1 Historical Populations and Water Demands

Historic growth data (2010 through 2019) was obtained from the Colorado Department of Local Affairs (DOLA) as part of the Town's recent comprehensive plan update. The Town's total 2019 population is estimated at approximately 10,000 (DOLA 2019), which is an increase of 4,000 residents (67 percent) since 2010 (Town of Wellington 2021a). Based on the DOLA population estimates, the Town experienced a population growth rate of approximately 6.85 percent on average per year from 2010 to 2019, and more recently approximately 9.4 percent on average per year between 2014 and 2021 (Town of Wellington 2021a). Historical water use demand data obtained from 2013 to 2017 indicates that the total average historical water demand, including estimated non-revenue water, was 995 AFY (Town of Wellington 2019).

4.2.2 Projected Buildout Demands

The Town projects that their population will increase between two and five percent annually between 2021 and 2040, reaching approximately 17,000 residents by 2030, and 25,000 residents by 2040 (Town of Wellington 2021b). Because of population growth and new development, the Town's annual treated water demand is expected to increase to approximately 1,683 AFY by the end of the 2018 Municipal Water Efficiency Plan's planning period, which extends to 2027 (Town of Wellington 2019). The Municipal Water Efficiency Plan estimates that, based on the historical water demand averages, the water supply is sufficient to allow the Town to grow to approximately 15,000 residents, "provided new developments provide water for their outdoor uses" (Town of Wellington 2019). However, given that population projections estimate that the population may reach 17,000 people in less than 10 years, the Town is working to improve water infrastructure and promote more efficient water use (Town of Wellington 2021a). Additional population growth and development will likely result in higher levels of wastewater flow to the WWTP, requiring increased treatment capacity.

4.2.3 Future Alternative Water Supplies

The Town is in the process of investigating additional water rights and is exploring involvement with the Northern Integrated Supply Project to ensure adequate water supply for the Town's residents in the future. The NPIC water is currently the primary water source that can be used to meet all of the Town's water demands, and is available for use in all areas within the Town's limits. Contamination or failure of the NPIC-related facilities would remove a large source of the Town's current and future water supply, posing a water supply issue in case of an emergency. The Town intends to continue pursuing new water right acquisition options to address this issue (Town of Wellington 2019, 2021).

5 Environmental Impacts

5.1 No Action Alternative

Under the No Action Alternative, no direct or indirect impacts to environmental resources would occur. The current WWTP facilities would not have the capacity to serve the Town's continuing growth, thereby limiting future development within the planning area.

5.2 Proposed Project

5.2.1 Direct and Secondary Impacts

Construction of the Town of Wellington water treatment plant expansion project may have direct impacts from facility construction and secondary and cumulative impacts from future development within the service area. Secondary impacts are those induced or stimulated by, or as a result of, the proposed action. These can include cumulative, social and land use impacts, among others. Cumulative impacts are the collective incremental impacts of the proposed action regardless of the entity undertaking the action. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. From the characteristics of the proposed project, and descriptive elements of the environmental setting, probable impacts are direct and/or secondary.

Potential secondary and cumulative impacts to the environment from new development, such as increased quantity and decreased quality of urban runoff, degradation of wetland and wildlife habitat, and increased air pollution and noise are likely to affect the planning area. Some of the more specific impacts are outlined in the following sections.

Surface Water and Groundwater Quality and Quantity

Based on the rated capacity of the proposed WWTP expansion, effluent from the WWTP could increase from 0.90 mgd to as much as 1.75 mgd. Effluent from the plant would continue to discharge into Boxelder Creek. Because the rated capacity would exceed 1 mgd after project implementation, the WWTP would be subject to compliance with Regulation 85 (Nutrients Management Control Regulation 5 CCR 1002-85). As discussed in Section 4.1.2, Boxelder Creek is considered an impaired water body due to existing concentrations of *E. coli* and selenium. Effluent from the proposed project would contain *E. coli*; however, based on the Colorado Discharge Permit System (CDPS) permit, the mass loading for *E. coli* allowed in the effluent would be approximately the same loading as allowed under the current CDPS permit. The selenium concentration limit in the CDPS permit will be reduced to 3.2 ug/L at the end of the year 2021. Because the expanded WWTP would discharge more effluent into Boxelder Creek, the amount of selenium delivered would also be higher. However, the concentration of selenium in the effluent is expected to meet the 3.2 ug/L limit. The proposed project would not use groundwater or pull surface water from Boxelder Creek. In their response to a scoping letter for the project, the Colorado Division of Water Resources indicated that the increased discharge resulting from the proposed improvements to the WWTP (approximately 1.3 cubic feet per second [cfs]) is not expected to cause any issues for downstream water users (Appendix B).

Construction-related activities for the WWTP could result in temporary non-point water quality issues, such as sedimentation. However, in compliance with the construction stormwater permit,

construction best management practices (BMPs) would be implemented during construction to stabilize and revegetate disturbed areas, thereby minimizing water quality impacts. Potential construction BMPs include the use of the following: erosion control blankets, sand filters, silt fences, culvert protection, erosion logs, construction fencing, vehicle tracking control, concrete washout, seeding/mulch, and temporary sediment trap/or temporary sediment pond.

Development in the planning area that would be serviced by the WWTP has the potential to result in short- and long-term non-point water quality impacts. This development would be subject to applicable stormwater permits to minimize short-term impacts during construction. Strategy FP 1.7 from the Town's *Comprehensive Plan 2021* promotes development of features and facilities, such as green infrastructure, to treat and manage stormwater runoff. The Town recognizes green infrastructure as "a cost-effective, resilient technique" to manage stormwater and "reduce floods, cut water purification costs, and restore water supplies." Additionally, permeable spaces throughout the Town, such as farmland and open spaces, can be leveraged as green infrastructure to help mitigate floods and droughts, which impact water quality and quantity (Town of Wellington 2021a). Strategy FP 1.8 ensures that "the Town's Landscape and Irrigation Standards assess options and locations for green stormwater infrastructure that address water runoff and supply and contribute to a more attractive and resilient urban environment." Implementation of Strategies 1.7 and 1.8 would help reduce secondary water quality impacts resulting from future development in the planning area.

Wetlands

No direct impacts to WUS, including wetlands, are anticipated as a result of the proposed project. In their response to a scoping letter for the project, USACE confirmed that no CWA permit was needed for this project (Appendix B). Future development within the Town's planning area has the potential to result in permanent and temporary impacts to wetlands and/or waterbodies, but such impacts cannot be assessed at this time. The CWA regulations control impacts to WUS and are intended to protect the functions and value of such areas. Any development within WUS would be subject to CWA permitting, which requires avoidance and minimization, and could require mitigation of permanent impacts.

Floodplains

The southeast portion of the WWTP site is within the effective 100-year floodplain of Boxelder Creek (FEMA 2020). While no improvements are proposed within the Boxelder Creek floodway, improvements within the 100-year floodplain of Boxelder Creek include the proposed digesters 5 and 6, proposed UV/blower building, and the outfall pipe from the UV/blower building. The proposed digesters 5 and 6 and UV/blower building would be elevated a minimum of two feet above the effective base level flood elevation. These structures are not within the preliminary Boxelder Creek floodplain currently under review. Correspondence with Larimer County indicates that a Conditional Letter of Map Revision (CLOMR) is not needed for the proposed project; however, a Floodplain Development Permit (FDP) would be required (Kurtz 2021).

Secondary impacts to the 100-year floodplain from future development in the planning area are possible; however, no such development has been approved by the Town at this time. Regulatory activities, including zoning and permitting, are intended to safeguard existing floodplains, as well as life and property adjacent to floodplains. The Future Land Use Map in the

Town's *Comprehensive Plan 2021* shows industrial and commercial land uses within the 100-year floodplain where predominantly agricultural land currently exists. The Plan indicates that the "future land use plan should be used to guide zoning changes at the request of the landowners as development and redevelopment occurs." Development affecting the designated 100-year floodplain is subject to floodplain development permit requirements. Town ordinances, in compliance with FEMA standards, do not allow placement of structures below the 100-year base flood elevation (Town of Wellington 2021a).

Agricultural Lands

No direct impacts to agricultural lands or farmland protected by the FPPA would occur as a result of the proposed project because all improvements would be within the Town's existing WWTP property.

Future development within the planning area has the potential to result in secondary impacts to agricultural lands, including prime farmland and farmland of statewide importance. However, no such development has been approved by the Town at this time. The future land use map in the Town's *Comprehensive Plan 2021* shows residential uses where active agricultural land and land designated as prime farmland and farmland of statewide importance currently exist. However, the Town recognizes the importance of conserving agricultural lands and strives for "purposeful growth" that "preserves valuable surrounding farmland" and "maintains the agricultural character of the Town" (Town of Wellington 2021a). Strategy FP 2.7 in the *Comprehensive Plan 2021* assesses opportunities such as conservation easements, transfer of development rights, etc., to help alleviate potential development pressures on farmers (Town of Wellington 2021a). Additionally, any future project or projects that receive federal funding are subject to compliance with the FPPA. The FPPA is intended to minimize the impact that federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. It assures that, to the extent possible, federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland. Implementing Strategy FP 2.7 in the Town's *Comprehensive Plan 2021* and adhering to the FPPA would help minimize the potential for converting agricultural land to non-agricultural land within the planning area.

Terrestrial and Aquatic Plants and Wildlife

Vegetation and Noxious Weeds

The proposed project is not expected to result in direct impacts to natural vegetation because all project-related disturbance would occur within the existing WWTP property, which is largely developed and devoid of natural vegetation. Soil disturbance from construction activities in the project area could create favorable conditions for noxious weeds to be introduced and established or to further spread. The Town's construction specifications, which include requirements for seeding of disturbed areas, would minimize impacts to vegetation at the WWTP site.

Potential secondary impacts to vegetation and the potential for noxious weed establishment associated with future development in the planning area are possible, but are unknown at this time. The landscape general provisions in the Town of Wellington Municipal Code (Section 16-3-

340) include erosion control and revegetation requirements that would minimize impacts to vegetation and minimize the possibility of noxious weed establishment (Town of Wellington 2018).

Wildlife

Direct impacts to wildlife species and their habitat as a result of the proposed project are not anticipated because project disturbance would occur within the existing WWTP property, which is largely developed and devoid of habitat. Temporary noise and increased human presence during construction may cause wildlife to avoid the vicinity of the WWTP.

Potential secondary impacts to wildlife associated with future development in the planning area are possible, but are unknown at this time. Permanent conversion of vegetation to impervious surfaces could degrade, diminish, and further fragment the number of general wildlife habitats in the planning area, which could reduce overall wildlife abundance in the area. Big game usage patterns or habitats could be altered from current conditions as development in the planning area progresses toward full buildout. Displaced wildlife may use remaining natural areas in the planning area and beyond the planning area. Displacement can lead to intra- and inter-species competition in habitats that are already occupied by wildlife. The Town's *Comprehensive Plan 2021* includes several strategies to minimize these types of impacts, including higher density residential, preservation of agricultural land, and preservation of open space spaces along natural stream corridors that wildlife tends to use (Town of Wellington 2021). Additionally, the Town's growth boundary (planning area) specifically excludes state wildlife areas directly east and west of the town (Town of Wellington 2021a).

Migratory Birds Including Raptors

Impacts to migratory birds, including raptors, as a result of the proposed project are relatively low. The WWTP improvements would primarily occur within a fenced boundary that is mowed, and the few trees that are present would not be removed. However, construction activities near existing trees and disturbance to natural vegetation within the Town's WWTP property, particularly the area west of the existing fence line, has the potential to impact nesting birds. Potential secondary impacts to migratory birds and raptors associated with future development in the planning area are similar to those discussed above for general wildlife.

Amphibians and Reptiles

The potential for the proposed project to impact amphibians and reptiles is considered low because suitable habitats are not present, particularly for amphibians. If any reptiles are present, it is likely they would disperse beyond the facility once construction ground disturbance begins. Potential secondary impacts to amphibians and reptiles associated with future development in the planning area are similar to those discussed above for general wildlife.

Fisheries

No direct impacts to fisheries would occur from the proposed project. Potential secondary impacts to fisheries within the planning area would depend on the extent disturbance that would occur to aquatic and riparian habitats, as well as water use (e.g., water depletions leading to less available surface water) as a result of future development. In most cases, these types of impacts are minimized through construction stormwater permits, floodplain development permits, clean water act permits, and setback requirements from streams and water bodies applied through local development review processes.

Federally-Listed Species

Because of the lack of suitable habitat within the project area and because no water depletions to construct or operate the WWTP would occur, no effects to federally listed species are anticipated. Potential secondary impacts to federally-listed species from future development in the planning area is unlikely. No secondary impacts are expected to species with no suitable habitat in the planning area and with no reliance on the downstream South Platte River system. This would include the Canada lynx and greenback cutthroat trout. Potential secondary impacts to other federally-listed species are discussed below.

Preble's Meadow Jumping Mouse

Suitable habitat for Preble's Meadow Jumping Mouse occurs along select riparian areas within the planning area. Future development projects, whether public or private, are subject to ESA requirements, which makes it unlawful "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" listed animal species or to "attempt to engage in such conduct." The USFWS has tools and incentives in place to promote species recovery for projects with no federal funding and/or projects on non-federal land, including grants, conservation banks, habitat conservation planning, candidate conservation agreements, and the safe harbor policy (USFWS 2009). Further, the Town's *Comprehensive Plan 2021* includes strategies to minimize impacts to this species, such as preservation of open space along natural stream corridors where suitable Preble's habitat may occur (Town of Wellington 2021a).

Ute Ladies'-tresses Orchid

While not known to occur in the planning area, suitable habitat for Ute Ladies'-tresses orchid occurs along wetland and riparian areas within the planning area. For protected plant species, ESA requirements apply to federally funded projects and federal lands. For non-federal projects on non-federal lands, the Town's strategy to preserve open space along natural stream corridors would serve to avoid and minimize potential secondary impacts from future growth in the planning area.

Whooping Crane, Piping Plover, Pallid Sturgeon, Western Prairie Fringed Orchid

Because these species are reliant on the downstream South Platte River system, water depletions from future development in the planning area could result in secondary impacts to these species. Water depletions to the South Platte River would be managed by the Town as a member of the South Platte Water Related Activities Program, Inc. (SPWRAP). In addition, any potential water depletion projects within the South Platte River basin with a federal nexus would be required to consult with the USFWS under the ESA. The Town's SPWRAP membership certificates and Platte River Recovery Implementation Program form are provided in Appendix C.

State Listed Species and Species of Concern

The project area lacks suitable habitat for state listed species and species of concern; therefore, no impacts to these species are anticipated. For state listed species and species of concern with suitable habitat in the planning area, potential secondary impacts associated with future development in the planning area are possible, but are unknown at this time. The types of potential impacts to these species and measures to avoid and minimize impacts are the same as described for general wildlife.

Cultural, Historical, and Archaeological Resources

Under the No Action Alternative, the existing WWTP would not be upgraded or expanded and would continue to operate as it does today. No construction or ground disturbance would occur under this alternative; therefore, it does not have the potential to affect historic resources.

The entire project area is disturbed and has been previously surveyed, with no cultural resources identified therein. While the rest of the APE has not been previously surveyed, most of the APE has been disturbed by agricultural operations. Because proposed improvements will occur entirely within the project area, direct impacts to unidentified historic architectural or archaeological resources within the APE are not expected to occur. Based on the scope of the project and their distance from the project area, the NRHP-listed Bee Farm (5LR.1917) and the four properties assumed eligible for the NRHP (Kesterson Farm [5LR.11402], Kerbel Residence [5LR.11403], and structures 45 years or older on two parcels) would not experience direct or indirect effects from the project. In consultation with the SHPO, it was determined that the proposed project would result in *no adverse effect* to historic resources.

Expansion of the WWTP would not directly affect previously evaluated properties within the planning area that are listed on, or have been determined field eligible or officially eligible for listing on, the NRHP. Potential secondary impacts to previously evaluated and currently unidentified historic resources within the planning area from future development served by the WWTP cannot be accurately assessed at this time because the location, type, and construction methods of future development is currently unknown. For this reason, the SHPO concurred with the APE as described Section 4.1.2, *Existing Resource Conditions*.

Direct impacts to undiscovered resources could occur during construction activities associated with this project.

Air Quality

Estimated emissions from the WWTP once the proposed improvements are implemented are provided in Table 5-1. The emission calculations exclude the WWTP's emergency generator.

Table 5-1 WWTP Emission Summary

Pollutant	lb/hr	Emissions	
		lb/yr	Tons/yr
VOCs	0.146	1,275.4	0.64
Hexane	0.017	150.4	0.08
Perchloroethylene	0.000	3.2	0.00
Benzene	0.010	83.5	0.04
Toluene	0.000	1.0	0.00
Total Xylenes	0.000	1.0	0.00
Ammonia	0.792	6,935.0	3.47

Source: Air Permitting Applicability Memorandum (Jacobs 2021b)

Notes:

VOC: Volatile organic compounds

lb/hr: pounds per hour

lb/yr: pounds per year

ton/yr: tons per year

The Comprehensive Environmental Response, Compensation and Liability Act and Emergency Planning and Community Right-To-Know Act have reporting requirements for ammonia, but do not provide authority to regulate emissions of ammonia (EPA n.d.). However, because the WWTP is anticipated to emit more than 250 pounds per year (0.125 tons per year), the project triggers the requirements under CDPHE Regulation 3 Part B II.B.3.b requiring an Air Pollution Emission Notice (APEN). The WWTP would not receive any industrial waste and would only treat domestic wastewater. Therefore, the facility would be exempt from requirements to obtain a Construction Permit under CDPHE Regulation 3 Part B II.D.1.d.

Within the planning area, secondary impacts to air quality associated with future development served by the WWTP could include increased emissions from the following sources: heating and cooling systems, motorized yard equipment, cooking appliances, commercial and industrial facilities, and electric generating systems. Increased vehicle usage and trips attributed to population growth and development could increase O₃ emissions, for which Larimer County is currently designated as non-attainment. strategy CP. 2.6 of the Town's *Comprehensive Plan 2021* is to "identify partners and resources to build a campaign to promote air quality in and around Wellington to ensure air quality is maintained as Wellington and the North Front Range continues to grow." Implementation of strategy CP. 2.6 would help to maintain air quality and minimize potential for secondary adverse impacts to air quality resulting from development in the planning area.

Environmental Justice

Proposed improvements to the WWTP facility would occur within the existing WWTP property. No EJ populations were identified in or surrounding the WWTP property and, therefore, no disproportionately high and adverse impacts to EJ populations would occur as a result of the proposed project.

Within the planning area, potential secondary impacts associated with development are not anticipated. While concentrations of low-income and LEP populations in block group 4 of Census tract 25.02 are higher than that of the county or state, this area is already substantially developed and existing developed land uses are expected to remain. Future land use on currently undeveloped parcels in this area are expected to be similar to current land use; residential, commercial, and civic uses (Town of Wellington 2021a).

While future demographics and development in the planning area are not known at this time, strategy CP.2.1 and CP.2.2 of the Town's *Comprehensive Plan 2021* support a greater mix of housing and affordable housing options in the planning area. These strategies will help minimize the potential for secondary impacts associated with growth in the planning area.

Cumulative Impacts

A cumulative impact on the environment results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions of any person or federal or non-federal agency. Cumulative impacts can result from individually minor but collectively significant actions occurring over a period of time. Cumulative impacts for the proposed action were evaluated for the planning area (Figure 3-1).

The proposed project would result in no impacts to WUS (including wetlands), wildlife species or their habitat, natural vegetation, migratory birds, fisheries, federally- and state-listed species and species of concern, agricultural lands, EJ communities, or historic resources. Therefore, the proposed project would not contribute to cumulative impacts to these resources within the planning area.

The project would have minor floodplain and air quality impacts. The project would not involve permanent changes to the floodplain that would require a CLOMR/Letter of Map Revision (LOMR). Project construction activities in the floodplain would meet requirements for an FDP through Larimer County. These temporary impacts would not contribute cumulatively to other potential floodplain impacts in the planning area. Ammonia emissions from the WWTP would require an APEN through CDPHE to report emissions. While ammonia is a non-criteria air pollutant for which there are no regulatory limits, it is a key factor in nitrogen deposition in Rocky Mountain National Park (CDPHE 2007). Agricultural operations, including livestock and synthetic fertilizers, are common sources of ammonia emissions (Colorado State University Extension n.d.). Estimates of annual ammonia emissions from agricultural sources are uncertain; however, a 2017 study indicated that one beef cattle feedlot in northeast Colorado may emit 382 metric tons (421 tons) of ammonia annually (Shonkwiler and Ham 2017). Given the prevalence of agricultural operations in northeast Colorado, the estimated annual ammonia emissions from the WWTP of 3.47 tons would not contribute significantly to cumulative air quality and related impacts associated with ammonia emissions in the region.

5.2.2 Unavoidable Adverse Impacts

Unavoidable adverse impacts of all construction and development related projects that may not be fully mitigated include:

- Short-term increases in noise and ambient air particulate levels and increased traffic in the immediate vicinity of construction activities.
- Increased pollution in stormwater runoff from construction sites and impervious surfaces throughout the planning area.
- Commitment of resources including capital, manpower, and materials.
- Loss of potential wildlife habitat due to development.
- Increased traffic associated with residential and commercial development served by the project.

5.3 Mitigation of Adverse Impacts

Local and regional policies, planning strategies, and requirements will serve to mitigate potential secondary impacts associated with future development served by the WWTP. These measures are included in the following plans and ordinances:

- Boxelder Creek Regional Stormwater Master Plan (2006)
- Colorado Discharge Permit System
- Town of Wellington Municipal Code (updated August 18, 2021)

- Town of Wellington 2018 Municipal Water Efficiency Plan
- Town of Wellington *Comprehensive Plan 2021*

In addition, the WWTP project will implement the following measures:

Floodplains: The Boxelder Creek Regional Stormwater Master Plan (PBS&J 2006) provided an implementation plan for stormwater management and flood prevention. Subsequently, the Boxelder Stormwater Authority was created in 2008 through an intergovernmental agreement (IGA) in accordance with Colorado Revised Statute 29-1-203 (Boxelder Stormwater Authority n.d.). The Authority has and continues to implement regional improvements to reduce flood hazards.

Migratory Birds including Raptors: To help avoid and minimize impacts to migratory birds protected under the MBTA, if construction is scheduled to occur during the typical migratory bird breeding season (April 1 – August 31), preconstruction surveys for active nests, including raptor nests, will be conducted to avoid disrupting migratory birds during the breeding season. Pre-construction surveys for raptor nests will follow the guidance outlined in CPW's *Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors* (CPW 2020). A qualified wildlife biologist will survey the disturbance areas for nesting migratory birds within seven days prior to any ground disturbing activity. To minimize impacts to migratory birds (including some raptors), active nests will be avoided during construction activities, in coordination with CPW.

Cultural, Historical, and Archaeological Resources: If unanticipated cultural resource discoveries are made during construction, all work in the vicinity of the find should cease and steps to evaluate the find and reinstate construction work should be carried out according to Town of Wellington policy and procedures.

6 Public Participation

The Town of Wellington Board of Trustees holds meetings twice per month that are open to the public. Town staff have provided regular updates on the proposed WWTP expansion at this meeting including design status and funding. The Town also has FAQs regarding the WWTP expansion posted on the Town website. On May 26, 2021, the Town hosted a Town Hall meeting where attendees were provided with project updates and information about funding.

This environmental assessment (EA) will be made available when CDPHE publishes the Finding of No Significant Impact (FNSI) for a 30-day public and agency review period at the Colorado Department of Public Health and Environment offices located at 4300 Cherry Creek Drive South, Denver, Colorado 80246-1530. A public meeting for this project will be held to present the EA findings, including a description of the project; the project's purpose and need; potential impacts of the project, including project effects determined under Section 106; mitigation measures identified; project schedule; and any changes in rates. The public meeting will be held in conjunction with the Town of Wellington Board of Trustees meeting on January 11, 2022, and will be advertised in the Fort Collins Coloradoan a minimum of 30 days prior to the meeting.

Comments received on the EA will be given due consideration.

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8 Agencies Contacted

The study team sent scoping letters in July 2021 to the following state and federal resource and regulatory agencies to provide them with early notification of the study and to request their input on environmental resources or issues under their jurisdiction to be addressed in the EA⁴. Their input was considered in the environmental analysis process.

- Colorado Department of Natural Resources, Division of Water Resources
- Colorado Department of Public Health and Environment
- State Historic Preservation Officer/Colorado Historical Society
- Colorado Parks and Wildlife
- National Park Service
- Natural Resources Conservation Service
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service

The July 9, 2021 letter to the SHPO also served as Section 106 consultation for the proposed project, and included a summary of cultural desktop research, description of the APE, survey methodology, and historic resources effect determinations. The SHPO responded on July 28, 2021, indicating that they agreed with the APE and survey methodology, and that the undertaking would result in *no adverse effect* to historic resources.

The July 21, 2021 letter to the USFWS included a list of species that have the potential to occur in the planning area and project area based on search results of the Information for Planning and Consultation online system; the absence of habitats supportive of the Canada lynx, Preble's meadow jumping mouse, black rail, greenback cutthroat trout, or Ute Ladies'-tresses orchid; and that no effects to Platte River species are anticipated because no South Platte River system water depletions would occur. In a July 28, 2021 email, the USFWS agreed with the information provided in the scoping letter and noted that there is no need to contact Ecological Services if a "No Effect" determination is made.

The Colorado Department of Natural Resources, Division of Water Resources responded in a letter dated August 5, 2021 indicating that the increased discharge to Box Elder Creek as a result of proposed improvements is not expected to cause any issues for downstream water users. However, they noted that the Town of Wellington and/or their contractor will need to coordinate with the District 3 Water Commissioner if any work is done in or near the river that could alter flows or otherwise negatively impact downstream waters users. They also noted that the Town may also need to obtain a USACE Section 404 permit prior to the start of any construction within the river bed, which is not currently proposed.

⁴ The Town's adopted 2014 Comprehensive Plan growth management area (GMA) was used as the planning area for agency scoping. After scoping, the Town confirmed that the planning area for this project consists of the Town's utility GMA, which is the area that the Town intends to serve with wastewater utility service at ultimate build-out.



In their August 5, 2021 email response, the National Park Service indicated that they have no concerns about the project relating to water quality and potential impacts to the Cache La Poudre wild and scenic river.

The USACE responded in an August 5, 2021 email and indicated that the project will not require a CWA permit.

The NRCS responded in a letter dated November 22, 2021, indicating the project is not subject to the FPPA.

No responses were received from CDPHE or CPW. Referenced correspondence is provided in Appendix B.



Appendix A:
U.S. Fish and Wildlife Service Resource List



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Colorado Ecological Services Field Office
Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
Phone: (303) 236-4773 Fax: (303) 236-4005
<http://www.fws.gov/coloradoES>
<http://www.fws.gov/platteriver>

In Reply Refer To:

June 17, 2021

Consultation Code: 06E24000-2021-SLI-0989

Event Code: 06E24000-2021-E-02562

Project Name: Wellington Waste Water Treatment Plant

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>;

<http://www.towerkill.com>; and

[http://](http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html)

www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Colorado Ecological Services Field Office

Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
(303) 236-4773

Project Summary

Consultation Code: 06E24000-2021-SLI-0989

Event Code: 06E24000-2021-E-02562

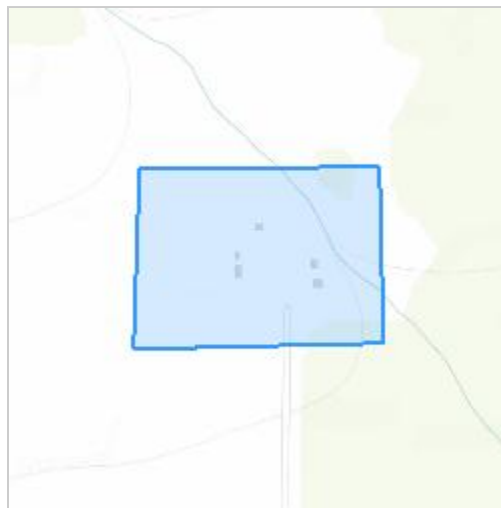
Project Name: Wellington Waste Water Treatment Plant

Project Type: WASTEWATER FACILITY

Project Description: Waste water treatment plant expansion and improvements

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.675776400000004,-104.99150352226137,14z>



Counties: Larimer County, Colorado

Endangered Species Act Species

There is a total of 9 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 4 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Canada Lynx <i>Lynx canadensis</i> Population: Wherever Found in Contiguous U.S. There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/3652	Threatened
Preble's Meadow Jumping Mouse <i>Zapus hudsonius preblei</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/4090 General project design guidelines: https://ecos.fws.gov/docs/tess/ipac_project_design_guidelines/doc6861.pdf	Threatened

Birds

NAME	STATUS
Eastern Black Rail <i>Laterallus jamaicensis ssp. jamaicensis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10477	Threatened
Piping Plover <i>Charadrius melodus</i> Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. The location of the critical habitat is not available. This species only needs to be considered under the following conditions: Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened
Whooping Crane <i>Grus americana</i> Population: Wherever found, except where listed as an experimental population There is final critical habitat for this species. The location of the critical habitat is not available. This species only needs to be considered under the following conditions: Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. Species profile: https://ecos.fws.gov/ecp/species/758	Endangered

Fishes

NAME	STATUS
Greenback Cutthroat Trout <i>Oncorhynchus clarkii stomias</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2775	Threatened
Pallid Sturgeon <i>Scaphirhynchus albus</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. Species profile: https://ecos.fws.gov/ecp/species/7162	Endangered

Flowering Plants

NAME	STATUS
Ute Ladies'-tresses <i>Spiranthes diluvialis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2159	Threatened
Western Prairie Fringed Orchid <i>Platanthera praeclara</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: Project includes water-related activities and/or use in the N. Platte, S. Platte, and Laramie River Basins which may affect listed species in Nebraska. Species profile: https://ecos.fws.gov/ecp/species/1669	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

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1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Jul 31
Burrowing Owl <i>Athene cunicularia</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9737	Breeds Mar 15 to Aug 31

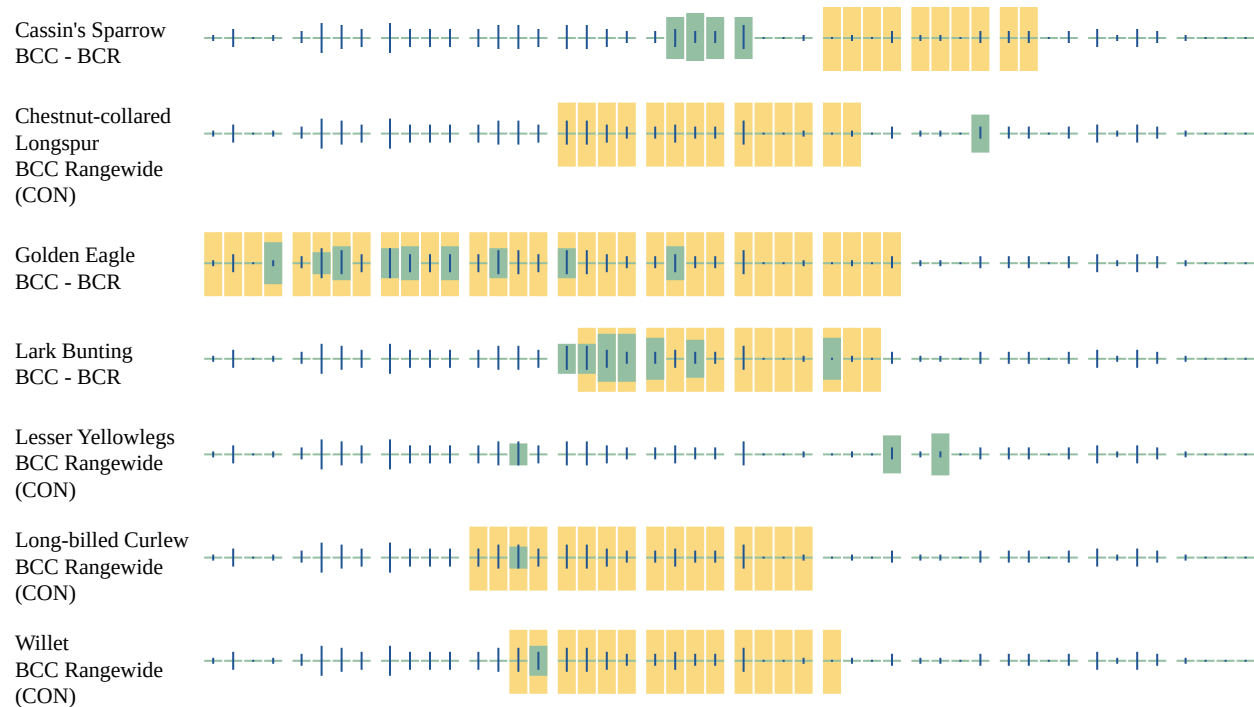
NAME	BREEDING SEASON
Cassin's Sparrow <i>Aimophila cassinii</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9512	Breeds Aug 1 to Oct 10
Chestnut-collared Longspur <i>Calcarius ornatus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 10
Golden Eagle <i>Aquila chrysaetos</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Lark Bunting <i>Calamospiza melanocorys</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 10 to Aug 15
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Long-billed Curlew <i>Numenius americanus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5511	Breeds Apr 1 to Jul 31
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 5

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
 2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
 3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles)
-

potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- [R4SBA](#)
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Appendix B: Agency Coordination

July 6, 2021

VIA EMAIL: Richard.Coffin@state.co.us

Mr. Richard Coffin
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Mr. Coffin:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).



Mr. Richard Coffin
Colorado Department of Public Health and Environment
Page 2

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Laura Meyer". The signature is fluid and cursive, with the first and last names clearly distinguishable.

Laura Meyer, AICP
Environmental Manager

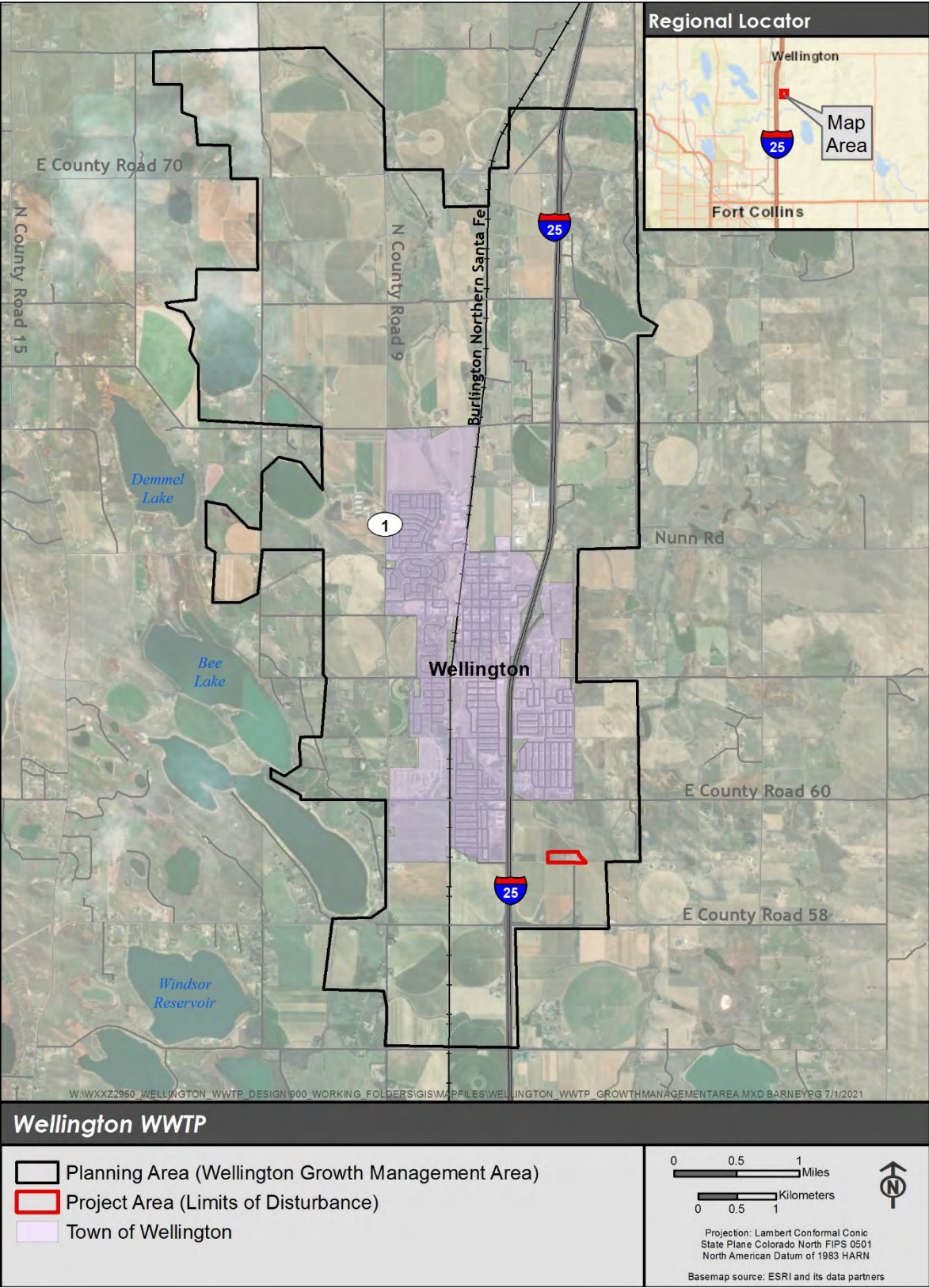
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





9191 South Jamaica Street
Englewood, Colorado 80112
United States
T +1.303.771.0900
www.jacobs.com

July 6, 2021

VIA EMAIL: Ashlynn.Rhodes@state.co.us

Ms. Ashlynn Rhodes
District Wildlife Manager
Colorado Parks and Wildlife
Fort Collins Office
317 Prospect Road
Fort Collins, CO 80526

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Ms. Rhodes:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

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The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the



Ms. Ashlynn Rhodes
Colorado Parks and Wildlife
Page 2

plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Meyer". The signature is fluid and cursive.

Laura Meyer, AICP
Environmental Manager

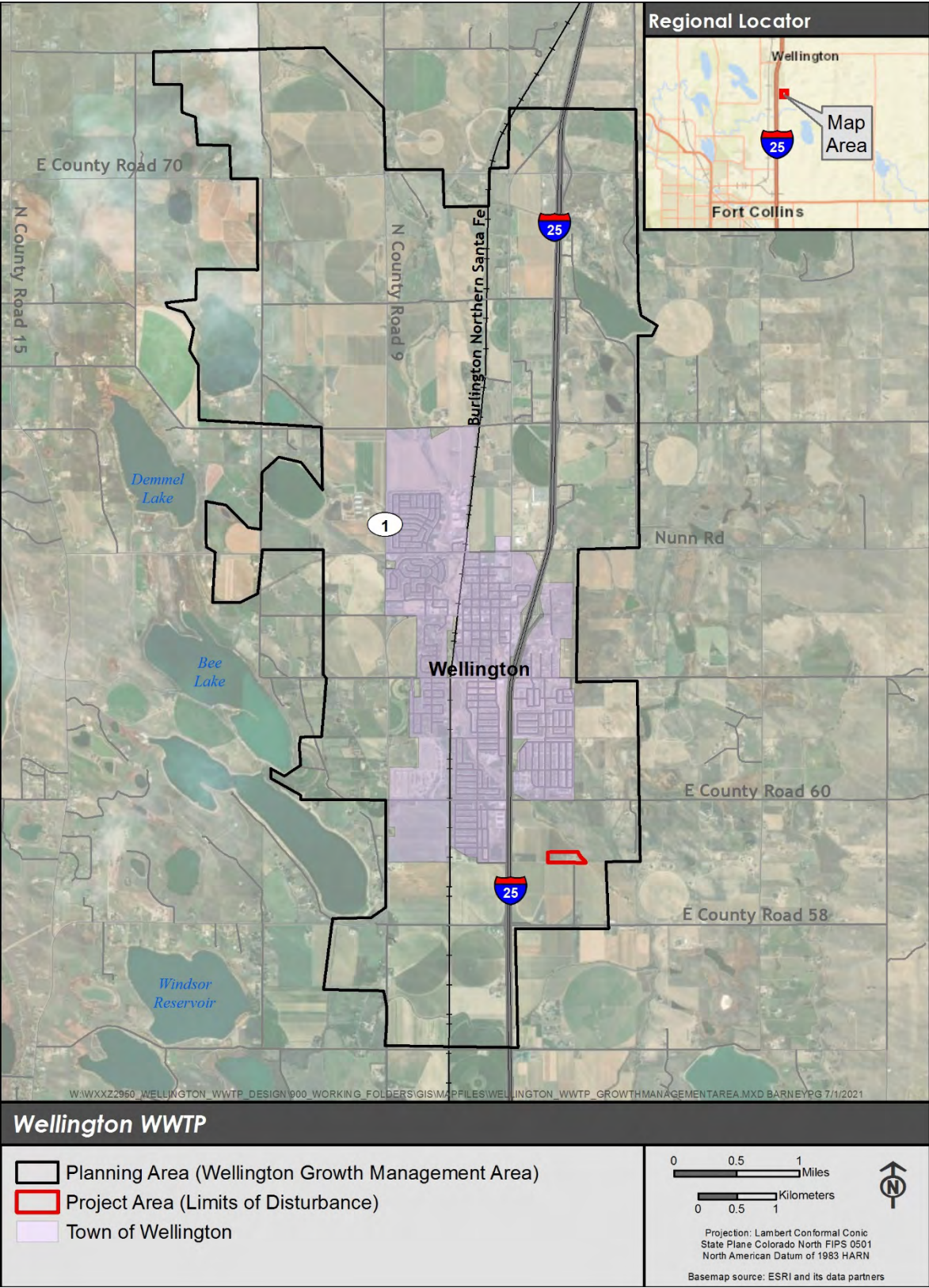
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





9191 South Jamaica Street
Englewood, Colorado 80112
United States
T +1.303.771.0900
www.jacobs.com

July 6, 2021

VIA EMAIL: Kevin.Rein@state.co.us

Mr. Kevin Rein, State Engineer
Colorado Department of Natural Resources
Division of Water Resources
1313 Sherman Street, Room 718
Denver, CO 80203

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Mr. Rein:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).



Mr. Kevin Rein
Department of Natural Resources, Division of Water Resources
Page 2

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Meyer". The signature is fluid and cursive, with the first and last names being more prominent.

Laura Meyer, AICP
Environmental Manager

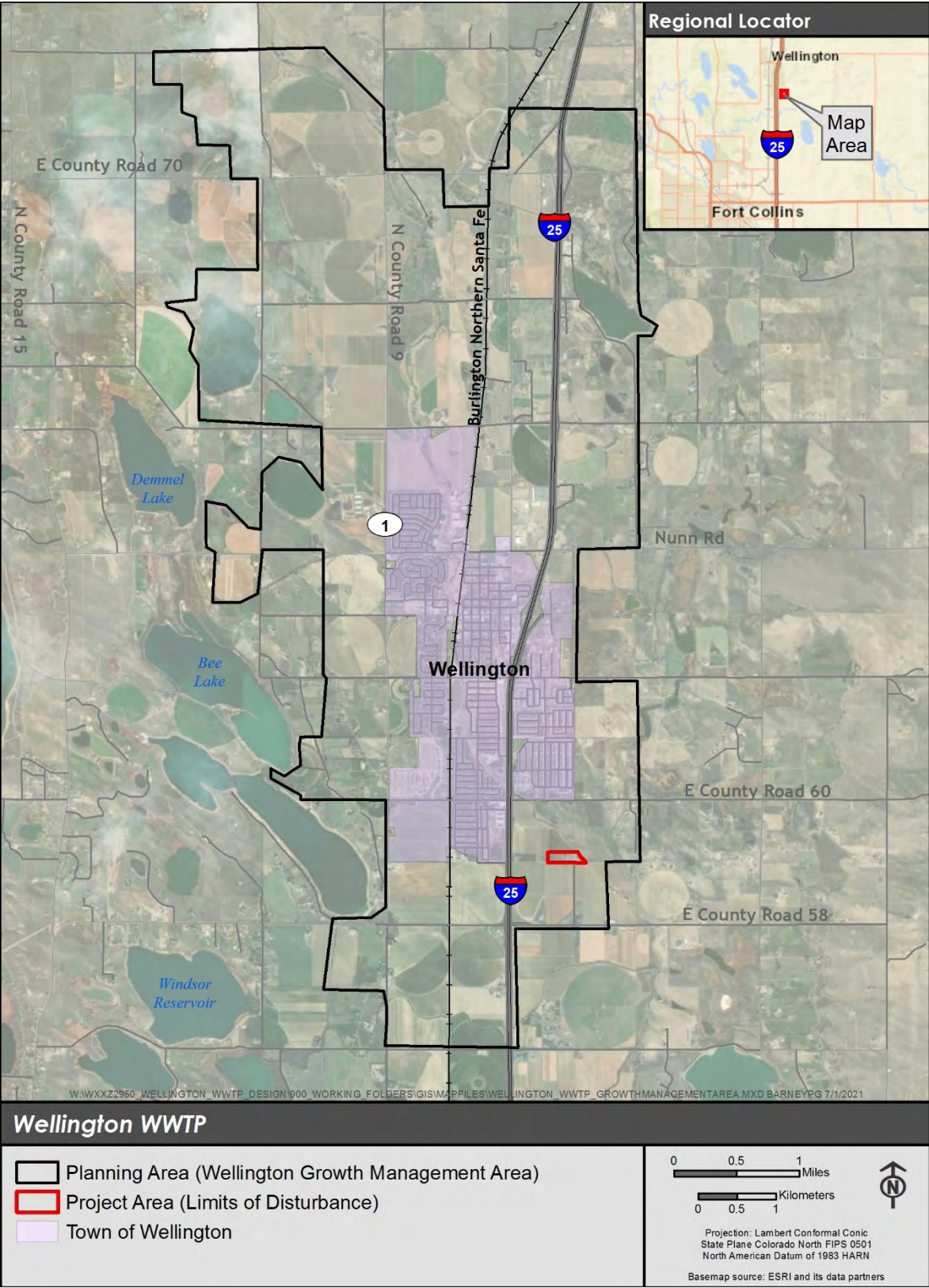
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





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Englewood, Colorado 80112
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www.jacobs.com

July 6, 2021

VIA EMAIL: Mary_Riddle@nps.gov

Ms. Mary Riddle
National Park Service
Intermountain Regional Office
Attn: Environmental Quality
P.O. Box 25287
Denver, CO 80225-0287

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Ms. Riddle:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the



Ms. Mary Riddle
National Park Service
Page 2

plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Laura Meyer". The signature is fluid and cursive, with the first and last names clearly distinguishable.

Laura Meyer, AICP
Environmental Manager

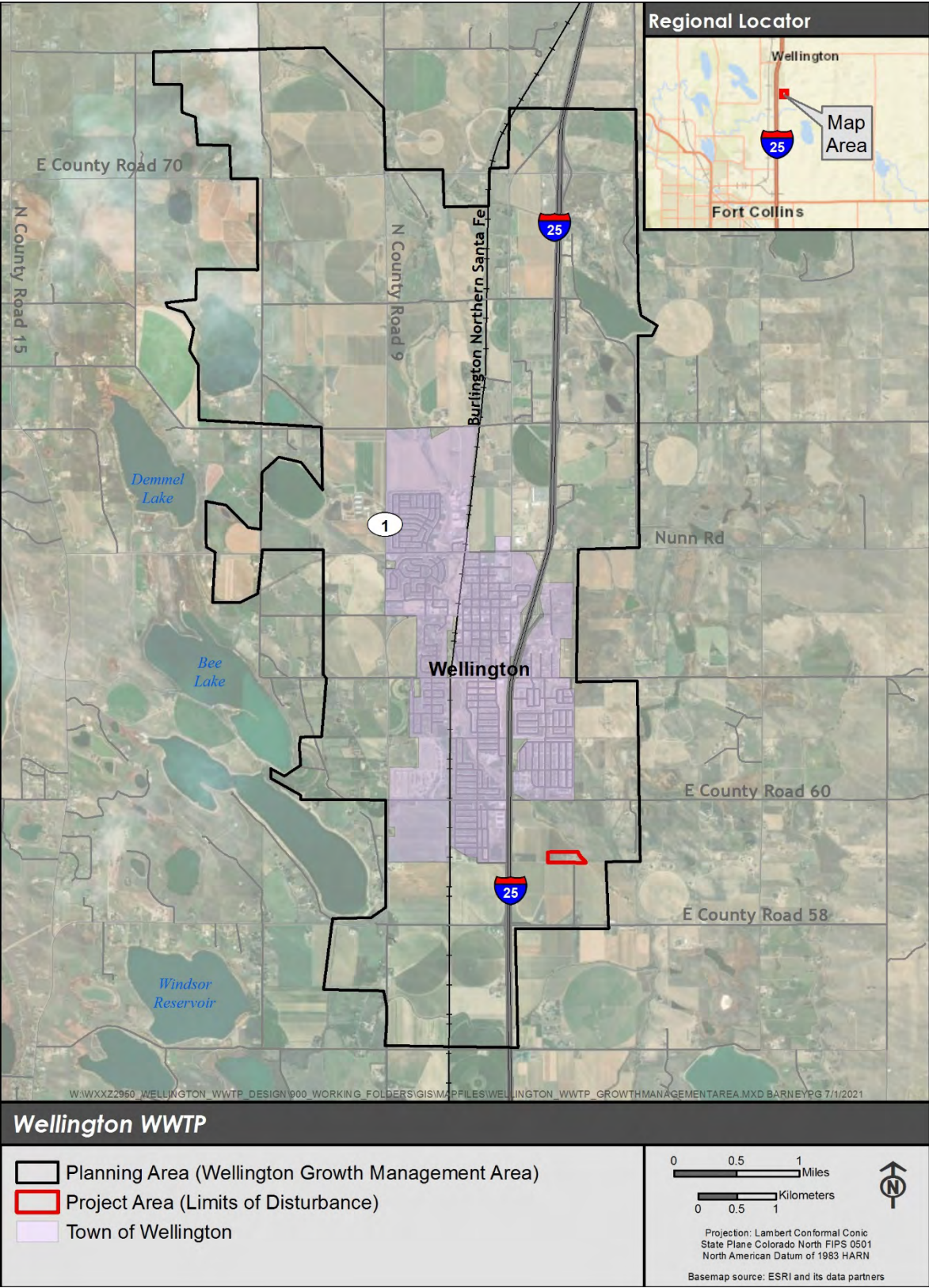
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





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July 6, 2021

VIA EMAIL: Clint.Evans@co.usda.gov

Mr. Clint Evans
State Conservationist
Natural Resources Conservation Service
Denver Federal Center
Building 56, Room 2400
P.O. Box 15426
Denver, CO 80225-0426

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Mr. Evans:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the



Mr. Clint Evans
Natural Resources Conservation Service
Page 2

plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
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The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

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Laura Meyer, AICP
Environmental Manager

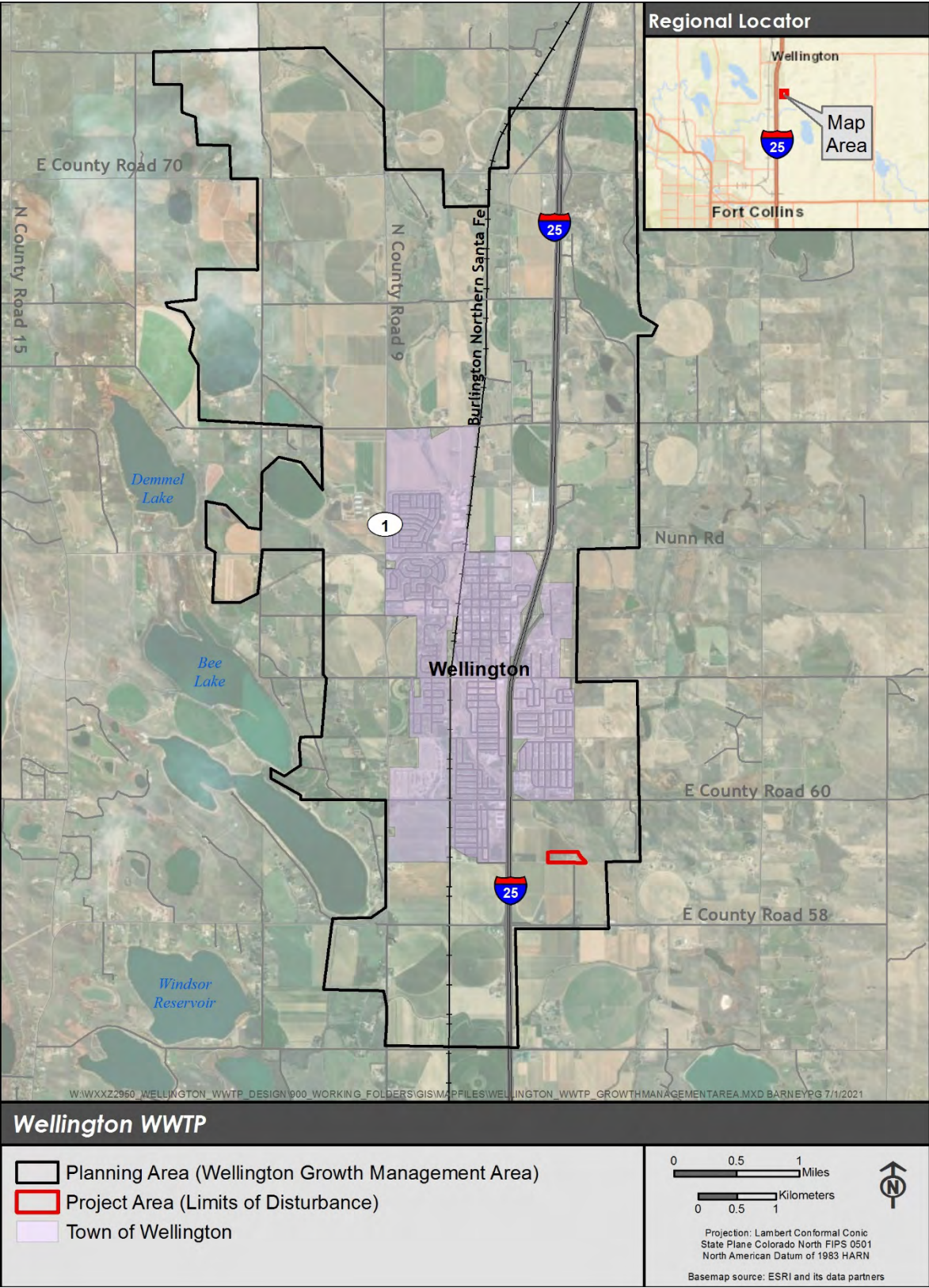
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





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July 6, 2021

VIA EMAIL: Matthew.R.Montgomery@usace.army.mil

Mr. Matthew Montgomery
U.S. Army Corps of Engineers
Omaha District
Denver Regulatory Office
9307 South Wadsworth Boulevard
Littleton, CO 80128

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Mr. Montgomery:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the



Mr. Matthew Montgomery
USACE Omaha District
Page 2

plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1). Based on a review of National Wetland Inventory (NWI) mapping, aerial imagery, and site visits, Boxelder Creek is located immediately east of the project area. However, no direct impacts would occur to this waterway and no other potential Waters of the U.S. are located within the Project Area.

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. As such, on behalf of the Town, we are writing to request input from your agency describing any environmental resources or issues that you believe need to be addressed in the EA.

Please email your response to me at laura.meyer@jacobs.com by August 6, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Laura Meyer".

Laura Meyer, AICP
Environmental Manager

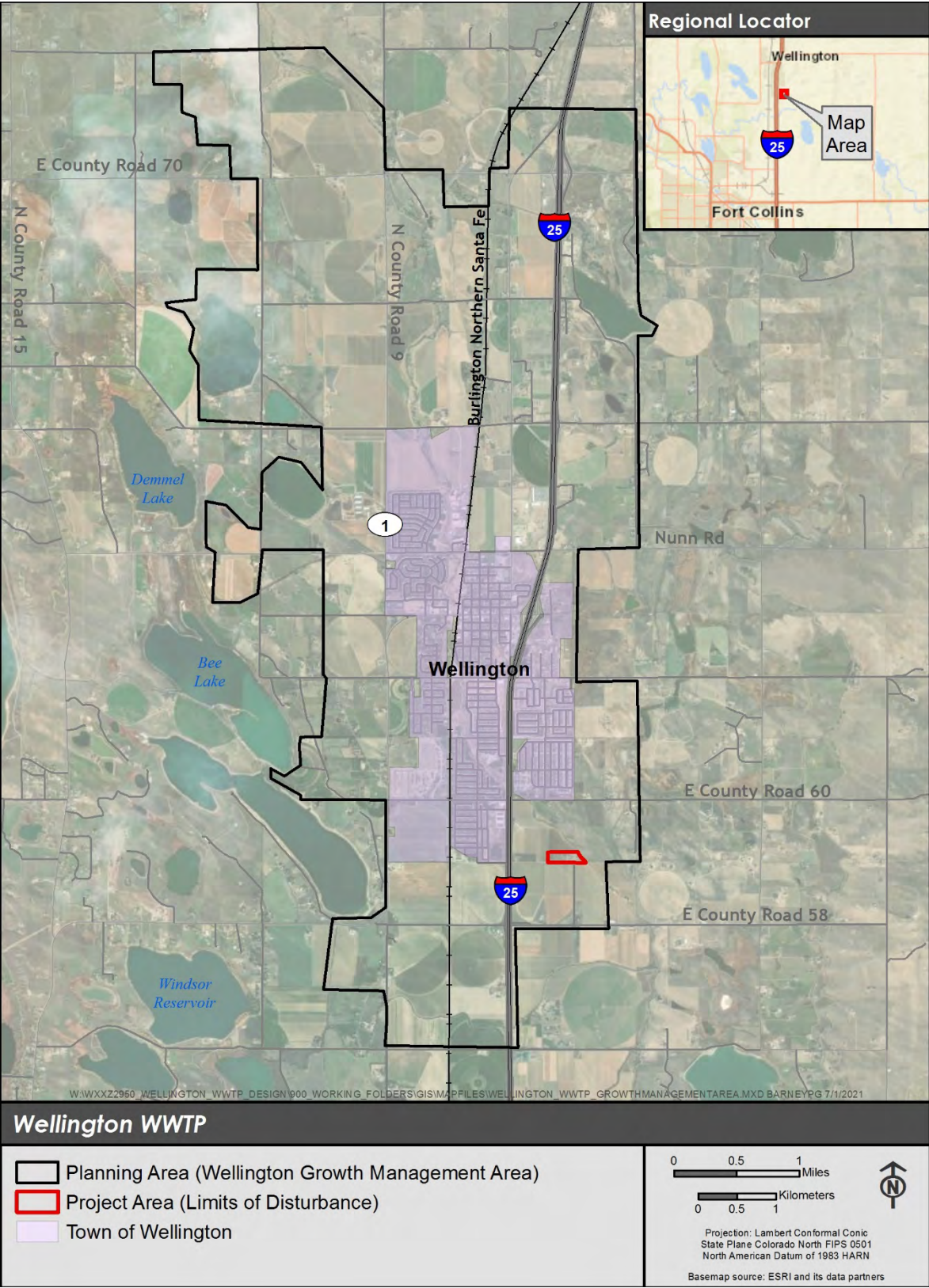
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area





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July 9, 2021

VIA EMAIL: Mitchell.Schaefer@state.co.us

(Note: submitted via SHPO's MoveIT file transfer system 7/14/21)

Mr. Steve Turner, AIA
State Historic Preservation Officer
History Colorado
1200 Broadway
Denver, CO 80203

Subject: Agency Scoping Request and Section 106 Consultation for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project, Project No. WXXZ2950

Dear Mr. Turner:

The Town of Wellington (Town) has contracted Jacobs Engineering to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the state environmental review process required for projects that are funded through the Clean Water State Revolving Fund (CWSRF) Program that is administered by the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division. The program finances the design and construction of Colorado water and water pollution control infrastructure. The U.S. Environmental Protection Agency provides grants to each state to capitalize state CWSRF loan programs, but is not involved at the project level in this program. Because the proposed project utilizes federal funds, the Town is conducting Section 106 consultation on behalf of the CDPHE.

The purpose of this letter is to provide early notification of the study, and to conduct Section 106 consultation for this proposed project. Jacobs is submitting this letter on behalf of the Town. A description of the proposed project; methods and results of cultural desktop research recently conducted; description of the Town's Planning area, Project Area, and proposed Area of Potential Effects (APE); survey recommendation; and effect determination are outlined in the attached memorandum entitled, *Cultural Resources Research for Wellington Wastewater Treatment Plant Improvements* (July 7, 2021).

As the attached memo discusses, the proposed improvements would occur entirely within the existing WWTP site (Project Area), which has been previously surveyed with no cultural resources identified therein. The APE has been disturbed by agricultural operations, and the majority has not been previously surveyed. Indirect effects of the proposed project to known historic properties



Mr. Steve Turner, AIA

July 9, 2021

Page 2

would not be adverse because of their distance from the Project Area. Based on the project scope, it is recommended that additional surveys of the proposed APE are not required.

This letter and attachment constitute the Town's request for your concurrence on the proposed APE, the recommendation that additional surveys of the proposed APE are not warranted, and that the proposed project would result in *no historic properties affected*.

Please email your response to me at laura.meyer@jacobs.com by August 9, 2021, if possible. You may also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Meyer".

Laura Meyer, AICP

Environmental Manager

Enclosure: *Cultural Resources Research for Wellington Wastewater Treatment Plan Improvements memorandum (Jacobs, 2021)*

Copies to: Dave Myer, PE, Town of Wellington
Kile Snider, PE, Town of Wellington

9191 South Jamaica Street
Englewood, Colorado
80112 United States
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www.jacobs.com

Subject	Cultural Resources Research for Wellington Wastewater Treatment Plan Improvements	Project Name	Wellington WWTP
Attention	Dave Myer, Project Manager, Town of Wellington	Project No.	WXXZ2950
From	Misty Swan, Jacobs		
Date	July 7, 2021		
Copies to	Project File		

Introduction

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the state environmental review process required for projects that are funded through the Clean Water State Revolving Fund Program (CWSRF). This program is administered by the Colorado Department of Public Health (CDPHE) Water Quality Control Division. The program finances the design and construction of Colorado water and water pollution control infrastructure. The U.S. Environmental Protection Agency provides grants to each state to capitalize state CWSRF loan programs, but is not involved at the project level in this program. Because the proposed project utilizes federal funds, the Town is conducting Section 106 consultation on behalf of the CDPHE.

The EA will evaluate direct impacts of proposed improvements within the Project Area (limits of disturbance) (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

Purpose of this Memorandum

The purpose of this memorandum is to provide the following information in support of the EA:

- Description of the project
- Summary of desktop research results

- Description of the proposed Area of Potential Effects (APE) and research conducted therein
- Recommendations for Section 106 consultation

Project Description

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 3).

The purpose of the project is outlined below:

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. The facilities will need to be replaced because they cannot be further expanded.

The WWTP site currently has 12 structures, including 7 concrete tanks, 4 metal buildings, and 1 masonry building. The existing structures range between 5 to 20 feet in height. Proposed improvements include construction of ten additional structures in the west and northeast portions of the site, including three metal buildings, 1 masonry building, and 5 concrete tanks. The appearance of the new structures would be similar to the existing structures, and range between 2 and 40 feet in height. Construction of these facilities would occur entirely within the existing WWTP parcel boundary.

The benefits of the proposed improvements include creating additional capacity for expected growth; reducing nitrogen and phosphorus concentrations in the effluent, which will reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

Desktop Research Results

Planning Area File Search

The EA will assess secondary and cumulative impacts from future development within the Planning Area. As such, Jacobs staff conducted a search of the Office of Archaeology and Historic Preservation (OAHP) Compass database on June 24, 2021 to identify resources within the Planning Area that have been previously evaluated for National Register of Historic Places (NRHP) eligibility. The database revealed that 35 resources within the Planning Area have been previously evaluated. Of those, two are listed on the NRHP, including the Bee Farm (5LR.1917) and the First National Bank Building (5LR.9633). Three resources have been officially determined eligible for listing on the NRHP, including the Windsor Ditch Segment (5LR.8934.1), North Poudre Canal Segment (5LR.9936.2), and the Clark Reservoir (5LR.12053). Of the remaining resources, 16 have been determined officially not eligible for the NRHP, 3 resources are field eligible for the NRHP, 9 are field not eligible for the NRHP, and 2 resources require more data (Table 1).

Table 1: Previously Evaluated Sites within Planning Area

Resource No.	Resource Name	Resource Type	NRHP Eligibility Status
5LR.683	Highland Cemetery	Historic	Field not eligible, 1982
5LR.797	First National Bank of Wellington (Original Building)	Historic	Field not eligible, 1982
5LR.1171	Lithic scatter	Archaeological	Officially not eligible, 1988
5LR.1172	Isolated find - lithics	Archaeological	Officially not eligible, 1988
5LR.1731.14	Colorado and Southern Railway	Historical Archaeology / Historic	Field eligible and supporting of linear resource, 2010
5LR.1917	Bee Farm, Bee's Inc. (Centennial Farm)	Historical Archaeology / Historic District	Listed on NRHP, 2002; amendment 2009 and 2010
5LR.8932.1	Larimer County Ditch (Segment)	Historical Archaeology / Historic	Officially not eligible, 2007
5LR.8932.6	Larimer County Ditch	Historical Archaeology / Historic	Field eligible and supporting of linear resource, 2010
5LR.8933	Isolated find - lithics	Archaeological	Field not eligible, 1999
5LR.8934.1	Windsor Ditch Segment	Historic / Historical Archaeology	Officially eligible, 2001
5LR.8934.2	Windsor Ditch, Poudre Valley Canal	Historical Archaeology	Field not eligible, 2001
5LR.8935	Isolated find - lithics	Archaeological	Field not eligible, 1999
5LR.8936.1	North Poudre Ditch Segment	Historical Archaeology	Field not eligible, 1999
5LR.9484	North Poudre Ditch Bridge, A-17-S	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9491	Larimer County Canal Bridge, B-16-DP	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9543	Sand Creek Bridge, LR5J-0.2-70	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9545	Southern Pacific Railroad Underpass, LR7J-0.2-70	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9546	North Poudre Canal Bridge, LR7-0.8-68	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9549	Larimer County Canal Bridge, LR9-0.4-56	Historical Archaeology / Historic	Officially not eligible, 2002
5LR.9633	First National Bank Building, Wallen Grocery Store, The Flower Mill	Historic	Listed on NRHP, 2000
5LR.9699	Wellington Hotel	Historic	Field needs data, 2000

Table 1: Previously Evaluated Sites within Planning Area

Resource No.	Resource Name	Resource Type	NRHP Eligibility Status
5LR.9936.2	North Poudre Canal - Segment	Historical Archaeology / Historic	Officially eligible, 2008
5LR.9991	Open Camp	Archaeological	Field eligible, 2002
5LR.9992.1	Soloman Ditch	Historical Archaeology	Field not eligible, 2001
5LR.9994.1	Cowan Lateral Ditch	Historical Archaeology	Field not eligible, 2001
5LR.10439	Grain Elevator, Wellington Family Fitness	Historic	Field not eligible, 2002
5LR.10923	Bender Family Farms (Centennial Farm)	Historical Archaeology	No NRHP status, surveyed 2004
5LR.11400	Colorado State University Agricultural Research, Development and Education Center	Historic	Officially not eligible, 2007
5LR.11401	State Board of Agriculture House	Historic	Officially not eligible, 2007
5LR.11402	Kesterson Farm	Historic	Officially not eligible, 2007
5LR.11403	Kerbel Residence	Historic	Officially not eligible, 2007
5LR.11404	Coal Creek Landscape Installation	Historic	Officially not eligible, 2007
5LR.12053	Clark Reservoir, North Poudre Reservoir 12 and 13, Upper and Lower Coal Creek Reservoir	Historical Archaeology / Historic	Officially eligible, 2008
5LR.12553	Kinzli Residence	Historic	Officially not eligible, 2010
5LR.12554	Reckard House	Historic	Officially not eligible, 2010

Description of Proposed Area of Potential Effects

The APE is defined in 36 Code of Federal Regulations (CFR) 800.16(d) as the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Effect means alteration to the characteristics of a historic property that qualify it for inclusion in or eligibility for the NRHP.

Using the methods outlined in the following sections, the proposed APE was established considering potential direct, indirect, and cumulative effects of the undertaking to known or potential NRHP-eligible resources and all aspects of integrity, including their associated settings. The area evaluated for establishing the proposed APE was considerably smaller than the Town of Wellington's Planning Area (Figure 2) for the following reasons:

1. The Planning Area is prohibitively large for conducting a cultural survey and evaluating resources for NRHP eligibility.
2. Conducting a cultural survey of the Planning Area at this time would not be beneficial because resources that are currently of insufficient age to be evaluated for NRHP eligibility could achieve sufficient age as development occurs over the next 20 years.
3. The features and attributes of existing NRHP-eligible resources within the Planning Area that rendered them eligible may change within the Town's 20-year development

timeframe, potentially rendering them not eligible for the NRHP by the time future development occurs.

4. The planning, design, and construction of Town development within the Planning Area will occur over decades; therefore, the specific location, type, and construction methods of development is currently unknown. As such, effects to existing NRHP-eligible resources from future development could not be accurately assessed today.

Desktop methods used to establish the proposed APE included a review of the Compass database file search conducted for the Planning Area discussed previously, review of Google Streetview to determine distances from which the existing WWTP site facilities may be visible, review of the Larimer County Assessor website data to identify structures on parcels adjacent to and within view of the project site that are 45 years old or older, and review of aerial photography to identify land uses and structures.

The WWTP site is located in the center of Section 10, Township 8N, Range 68W. The historic boundary of the Bee Farm (5LR.1917), which was listed on the NRHP in 2002, is located in the southwest corner of Section 10. Its farmhouse and associated buildings are located in the south portion of the historic boundary. Using Google Streetview, it was found that the existing WWTP structures are barely discernible from the Bee Farm buildings, and that their appearance is similar to other farmhouses and outbuildings that are visually discernible from that location. Therefore, it was determined that the existing WWTP structures do not affect the setting and attributes of the Bee Farm that rendered it eligible for the NRHP. Based on that finding, establishment of the APE was confined within Section 10.

In addition to the Bee Farm historic resource, Section 10 contains four parcels with structures that are 45 years old or older that are within viewing distance of the WWTP site. Of these, two have been officially determined not eligible for the NRHP (Kesterson Farm [5LR.11402] and Kerbel Residence [5LR.11403]) and two have not been evaluated by the State Historic Preservation Officer (SHPO) for NRHP eligibility (Figure 4).

The proposed APE encompasses potential direct and indirect impacts associated with proposed improvements. It includes the WWTP parcel, the Bee Farm (5LR.1917) historic boundary, parcels immediately adjacent to the WWTP parcel, and the four parcels noted above with structures that are 45 years old or older that would potentially experience indirect visual impacts from proposed improvements. The proposed APE comprises approximately 390 acres (Figure 4).

Area of Potential Effects Research

The June 24, 2021 Compass database file search revealed that most of the APE has not been previously surveyed for the presence of cultural resources. The database identified one previous survey conducted within the proposed APE that covered the entire WWTP site, entitled "A Class III Archaeological Survey of the Proposed Wellington Wastewater Treatment Plant and Access Road, Larimer County, Colorado (Document no. LR.EP.NR1)." Three resources within the proposed APE have been previously evaluated for NRHP eligibility; two were officially determined not eligible, and the third (Bee Farm [5LR.1917]) is listed on the NRHP (Table 2 and Figure 4).

Table 2: Previously Evaluated Resources within Proposed APE

Resource No.	Resource Name	Resource Type	NRHP Eligibility Status
5LR.1917	Bee Farm, Bee's Inc. (Centennial Farm)	Historical Archaeology / Historic District	Listed on NRHP, 2002; amendment 2009 and 2010
5LR.11402	Kesterson Farm	Historical	Officially not eligible, 2007
5LR.11403	Kerbel Residence	Historical	Officially not eligible, 2007

The Bee Farm (5LR.1917) historic boundary encompasses four parcels. According to the Compass database, the Bee Farm was listed on the NRHP in 2002. It is eligible for the NRHP under Criterion A for its long association with the development of agriculture in Larimer County and the high plains of Colorado, and pioneer settlement in the Boxelder Valley. It is also eligible under Criterion C for its architecture and construction techniques that represent those employed by farmers with limited means and materials. The extant buildings retain relatively undisturbed vistas of the Rocky Mountains and the bluffs of Boxelder Creek.

The Bee Farm historic boundary is located approximately 30 feet south of the WWTP parcel, separated from that parcel by a gravel road. Agricultural fields cover the north and central portions of the Bee Farm historic boundary, with the farmhouse and outbuildings located at the south end. The northernmost outbuildings on the property are located approximately 2,350 feet from the WWTP site. A review of Google Streetview revealed that existing WWTP structures are barely discernible from the Bee Farm outbuilding complex, with an appearance consistent with other farmhouses and outbuildings visible in the distance from that location.

The two resources (Kesterson Farm [5LR.11402] and Kerbel Residence [5LR.11403]) within the APE that were officially determined not eligible for the NRHP are approximately 1,280 feet and 1,585 feet from the WWTP site, respectively. Two previously unevaluated sites with structures more than 45 years old are located within the proposed APE, including a residence at 4824 E. County Road 58 and a residence at 4612 E. County Road 58. Their distance from the WWTP site ranges between approximately 2,100 and 2,800 feet. Google Streetview revealed that the existing WWTP facilities are barely visible in the distance from these resources and appear as other farm structures that are visible in the distance.

Section 106 Consultation Recommendations

The entire Project Area (WWTP site) is disturbed and has been previously surveyed, with no cultural resources identified therein. Therefore, it is unlikely that any previously unidentified historic architectural or archaeological resources are located within the Project Area.

The proposed APE is previously disturbed by agricultural operations, and the majority of the proposed APE has not been subjected to previous cultural resource surveys. Because proposed improvements will occur entirely within the Project Area (WWTP site), direct impacts to unidentified historic architectural or archaeological resources within the proposed APE are not expected to occur.

The proposed APE contains the NRHP-listed Bee Farm (5LR.1917) historic boundary, which is approximately 30 feet south of the WWTP site. Proposed improvements would occur entirely within the existing WWTP site and, therefore, would result in no direct effects to the Bee Farm

(5LR.1917). Because of their distance (approximately 2,350 feet) from the WWTP site, the structures located in the south portion of the Bee Farm historic boundary are not indirectly affected by the existing WWTP structures. Likewise, given their distance from the project and the limited project scope, it is unlikely that the Bee Farm structures would be indirectly affected from proposed improvements. Similarly, if the Kesterson Farm and Kerbel Residence were reevaluated and the two unevaluated residences within the proposed APE that are 45 years or older were newly evaluated, and it is assumed that all would be determined NRHP eligible, it is unlikely that they would experience indirect effects from the proposed improvements given their distance (ranging between 1,280 and 2,800 feet) from the WWTP site.

Based on the foregoing, the proposed improvements are unlikely to affect NRHP-eligible resources. It is recommended that a Section 106 letter be submitted to the SHPO summarizing the findings of this memorandum, recommend that no additional surveys of the APE are warranted, indicate that a finding of *no historic properties affected* is appropriate for this project, and request the SHPO's concurrence.

Direct impacts to undiscovered resources could occur during construction activities. If unanticipated discoveries are made during construction, all work in the vicinity of the find should cease and steps to evaluate the find and reinitiate construction work should be carried out according to Town of Wellington and CDPHE policy and procedures.

Figure 1: Project Area/Limits of Disturbance



Figure 2: Planning Area

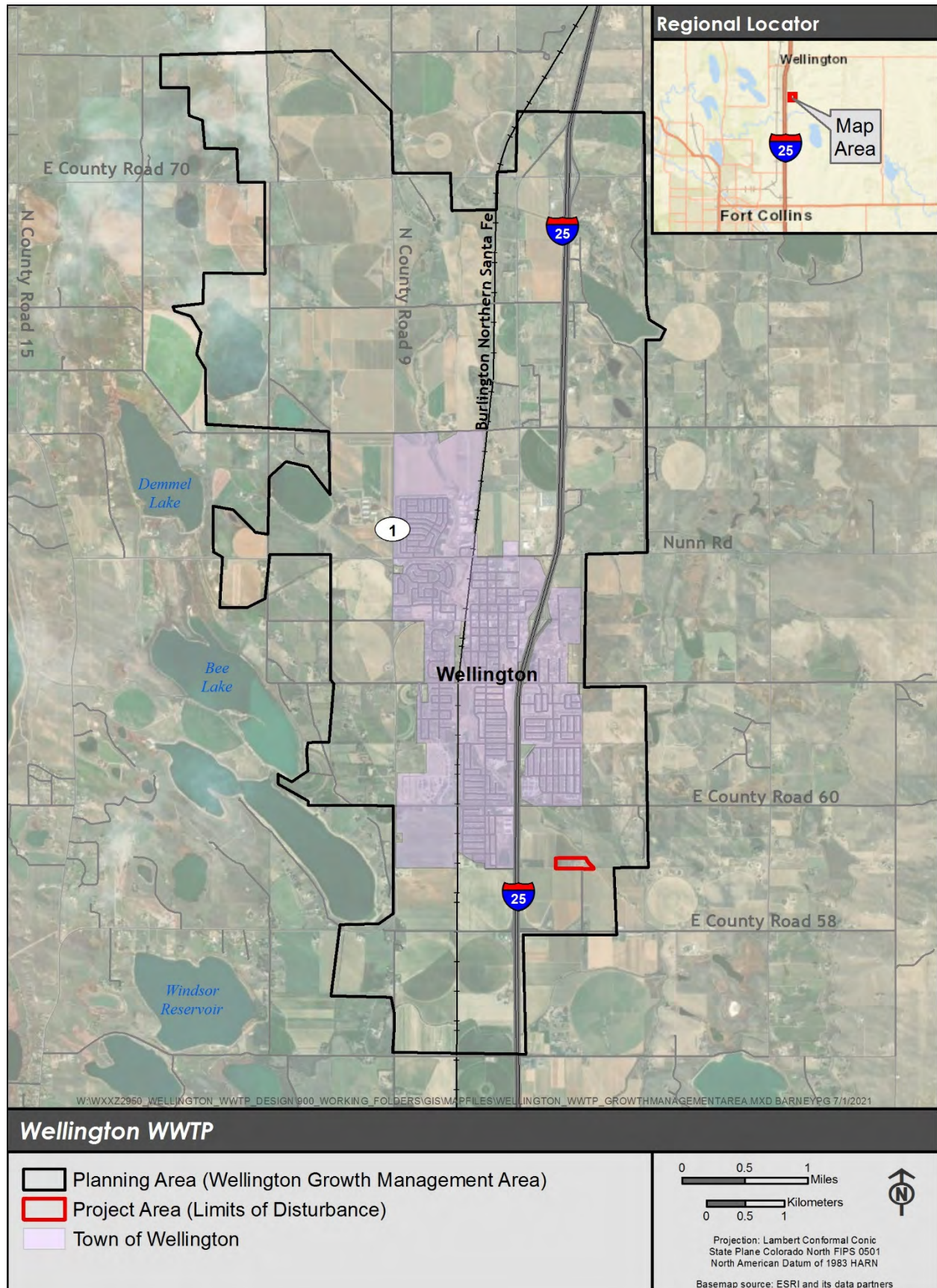


Figure 3: Proposed Improvements

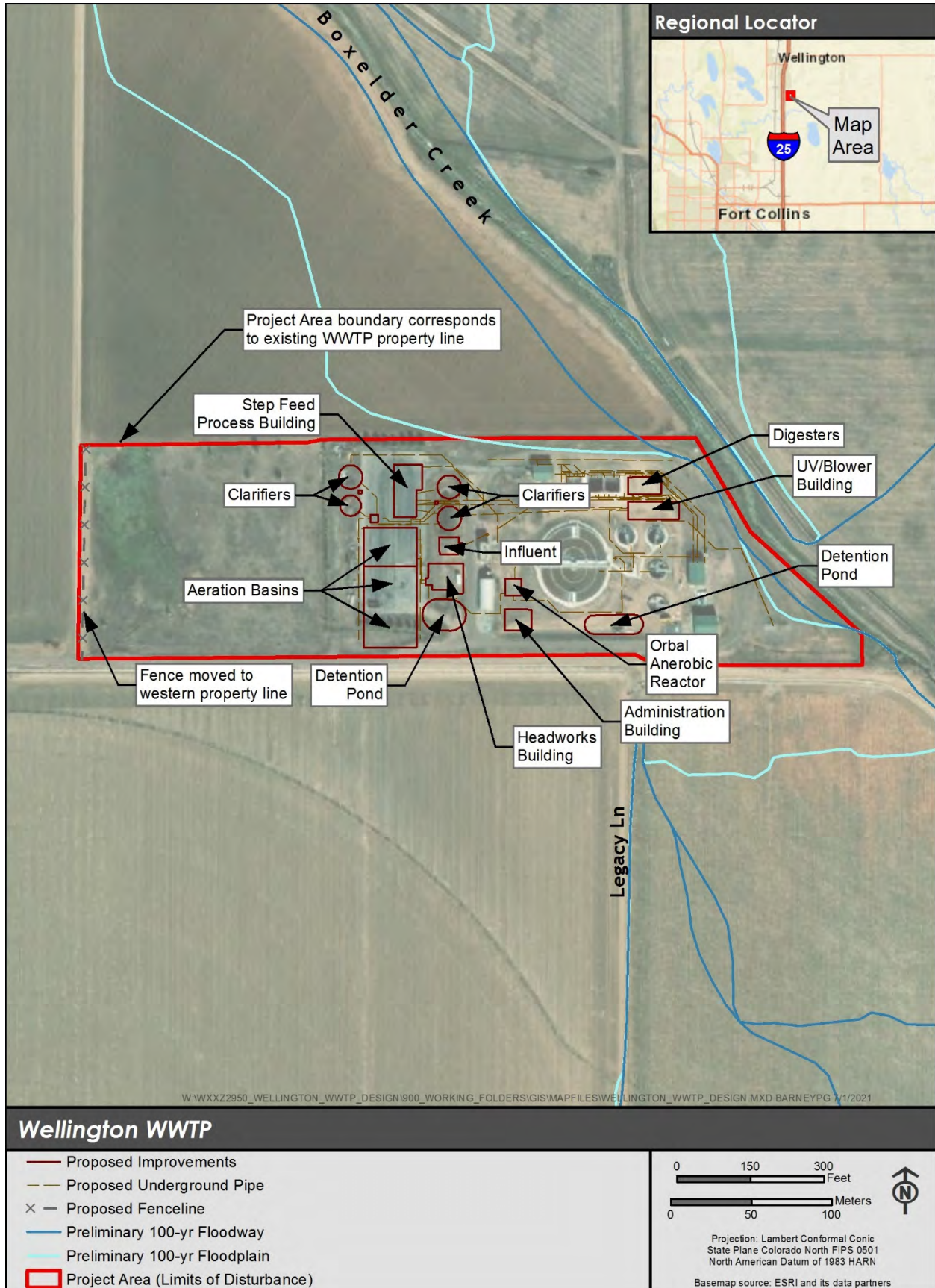
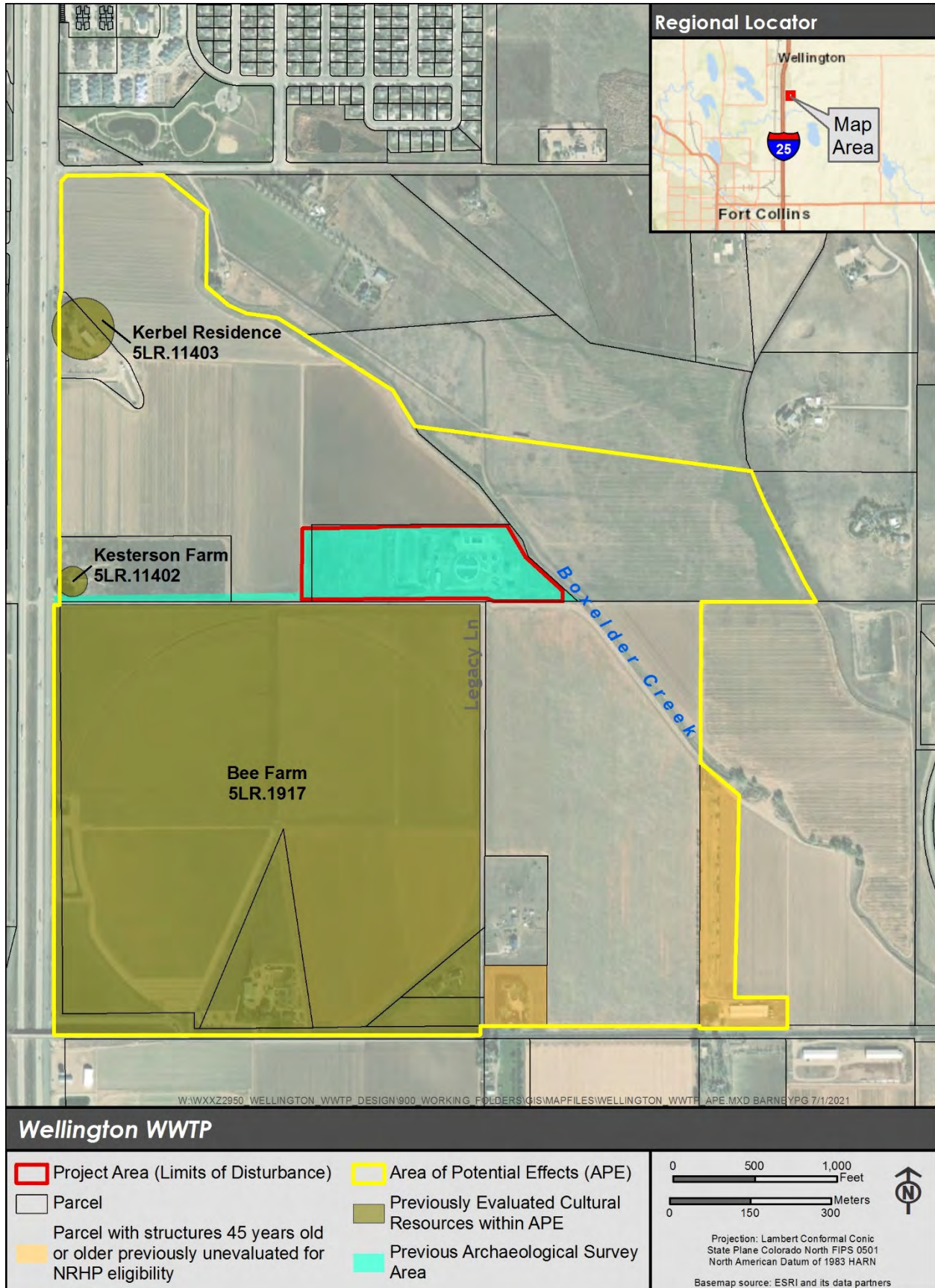


Figure 4: Area of Potential Effects



July 21, 2021

VIA EMAIL: Nicole_Alt@fws.gov

Ms. Nicole Alt, Field Supervisor
U.S. Fish & Wildlife Service
Ecological Services, Colorado Field Office
P.O. Box 25486, DFC
Denver, CO 80225-0486

Subject: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Ms. Alt:

Jacobs Engineering has been contracted by the Town of Wellington (Town) to prepare an Environmental Assessment (EA) for proposed improvements to the Town's wastewater treatment plant (WWTP) in Larimer County, Colorado. The EA, which will evaluate the direct, secondary, and cumulative impacts associated with the proposed improvements, is part of the State environmental review process required for funding through the State Revolving Fund Program. This program, which is being administered by the Colorado Department of Public Health and Environment (CDPHE), finances the design and construction of Colorado water and water pollution control infrastructure. The EA will evaluate direct impacts of proposed improvements within the Project Area (Limits of Disturbance), which corresponds to the existing WWTP property line (Figure 1). The EA study area for secondary and cumulative impacts, referred to as the Planning Area, includes the Town's current urban boundary and areas planned for the Town's expansion over the next 20 years (Figure 2).

The existing WWTP is located south of the Town of Wellington city limits at 6172 NE Frontage Road, Wellington, Colorado. The WWTP treats wastewater flows from the Town's collection system that are received from residential, commercial, industrial, and civic sources. The existing plant, which was originally constructed in 2003 and expanded in 2016, has a current capacity of 0.9 million gallons per day (mgd) as rated by the CDPHE. Current operations at the plant include administration facilities, influent screening, grit removal, influent pumping, aeration, clarification, and ultraviolet (UV) disinfection for liquid processing prior to discharge to Boxelder Creek. Solids processing includes aerobic digestion, dewatering, and air drying prior to hauling to a third party solids composting facility.

The proposed project would increase the plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The project would also move the existing fence on the west side of the plant farther west to the Town's property limit. All proposed improvements and construction activities would occur within the existing property limit owned by the Town for the WWTP (Figure 1).

The purpose of the project is outlined below:



Ms. Nicole Alt
U.S. Fish and Wildlife Service
Page 2

- Flows and loads to the plant are nearing the plant's capacity as a result of growth within the Town.
- More stringent wastewater nutrient removal regulations will need to be met for discharge of plant effluent in the near term.
- The original facilities are aging and require investment to continue their use in the future. Some of the facilities will need to be replaced because they cannot be further expanded.

The benefits of the proposed improvements include creating additional capacity for expected population growth; reducing nitrogen and phosphorus concentrations in the effluent to reduce water quality impacts to Boxelder Creek; increasing energy efficiency for plant processes; and improving safety, operations, and maintenance for the facility.

The purpose of this letter is to provide early notification of the study and solicit your input. Based on results from the Information for Planning and Consultation online system, the following species have the potential to occur:

- Canada lynx (*Lynx canadensis*) – Threatened
- Preble's Meadow Jumping Mouse (*Zapus hudsonius preblei*) – Threatened
- Eastern Black Rail (*Laterallus jamaicensis ssp. jamaicensis*) - Threatened
- Piping Plover (*Charadrius melodus*) – Threatened
- Whooping Crane (*Grus americana*) – Endangered
- Greenback Cutthroat Trout (*Oncorhynchus clarkii stomias*) – Threatened
- Pallid Sturgeon (*Scaphirhynchus albus*) – Endangered
- Ute Ladies'-tresses (*Spiranthes diluvialis*) – Threatened
- Western Prairie Fringed Orchid (*Platanthera praeclara*) - Threatened

No water depletions from the South Platte River system would occur and therefore, effects to Platte River species are not anticipated. Additionally, based on field visits, habitat characteristics are not present for the Preble's meadow jumping mouse or Ute ladies'-tresses orchid along Box Elder Creek as this creek is incised and bounded by agriculture fields. Your comments on the proposal will help us to identify issues and concerns related to the project. Maps showing the project area are enclosed for your reference.

Please email your response to me at laura.meyer@jacobs.com by August 20, 2021, if possible. You can also contact me at 303-204-6744 or laura.meyer@jacobs.com with any questions regarding this request.

Sincerely,

Laura Meyer, AICP
Environmental Manager

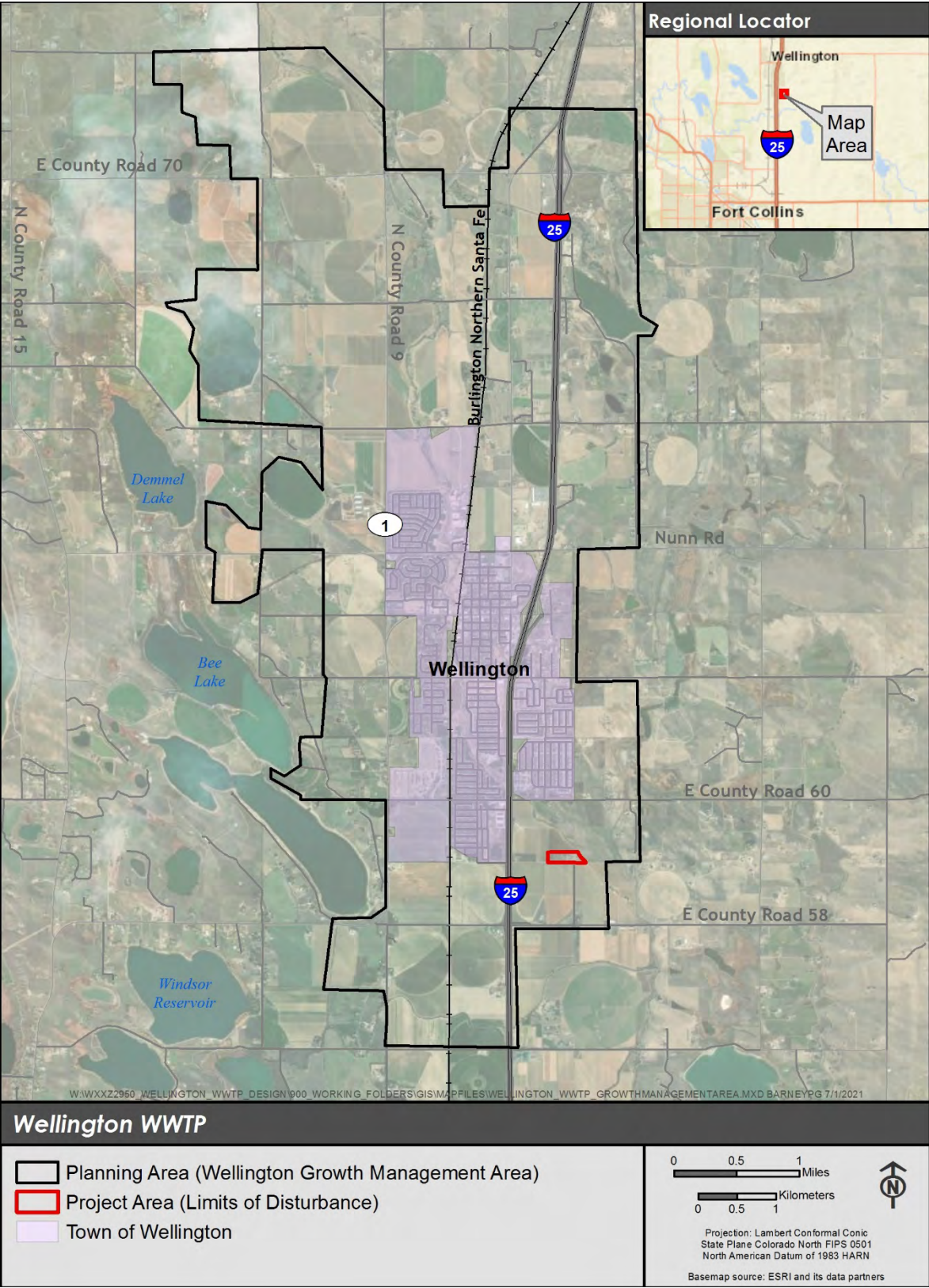
Enclosure: Project Area Map, Planning Area Map

Copies to:
Dave Myer, PE
Kile Snider, PE

Figure 1: Project Area (Limits of Disturbance)



Figure 2: Planning Area



(Received July 23, 2021)



Ms. Laura Meyer, AICP
Environmental Manager
Jacobs Engineering
9191 South Jamaica Street
Englewood, Colorado 80112

RE: Wellington Wastewater Treatment Plan Improvements
Town of Wellington, Larimer County, Colorado
Jacobs Engineering Project No. WXXZ2950
History Colorado No. 80091

Dear Ms. Meyer:

Thank you for your correspondence dated July 7, 2021, which our office received on July 14, 2021, initiating consultation for the aforementioned project under Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC § 306108), and its implementing regulations, 36 CFR Part 800.

We have reviewed all documentation submitted for this project and agree the defined area of potential effect (APE) and survey methodology are appropriate for the undertaking. It is our opinion the undertaking as described will result in *no adverse effect* to historic properties such as the Bee Farm (5LR.1917), which was listed in the National Register of Historic Places in 2002.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register eligibility criteria (36 CFR §60.4) in consultation with our office pursuant to 36 CFR §800.13. Also, should the consulted-upon scope of the work change, please contact our office for continued consultation under Section 106 of the National Historic Preservation Act.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR §800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mitchell K. Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitchell.schaefer@state.co.us.

Sincerely,

Dr. Holly Kathryn Norton Digitally signed by Dr. Holly Kathryn Norton
Date: 2021.07.22 17:00:29 -06'00'

Steve Turner, AIA
State Historic Preservation Officer
ST/mks

We are now accepting electronic consultation through our secure file transfer system, MoveIT. Directions for digital submission and registration for MoveIT are available at <https://www.historycolorado.org/submitting-your-data-preservation-programs>.

From: San Miguel, George L <george_sanmiguel@fws.gov>

Sent: Wednesday, July 28, 2021 2:47 PM

To: Meyer, Laura <Laura.Meyer@jacobs.com>

Subject: [EXTERNAL] Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Hello Laura Meyer,

The U.S. Fish and Wildlife Service (Service) has reviewed your letter of July 21, 2021, associated with the development of an environmental assessment for the proposed Wastewater Treatment Plant Improvement Project in Wellington, CO. Based on the information provided, we agree that habitat characteristics along Box Elder Creek and elsewhere in the vicinity of the Plant are not supportive of the Canada lynx, Preble's meadow jumping mouse, black rail, greenback cutthroat trout, or Ute ladies'-tresses orchid. We also agree that because there would be no water depletions from the South Platte River system there would be no effects to Platte River species.

If there is a "No Effect" determination, there is no need to contact Ecological Services.

We appreciate your efforts to ensure the conservation of threatened and endangered species. Thank you for contacting us and please let me know if you have any further questions.

George L. San Miguel

Wildlife Biologist
Colorado Ecological Services Field Office
US Fish & Wildlife Service
134 Union Blvd., Suite 670
Lakewood, Colorado 80228
(303)236-4752
George_SanMiguel@FWS.gov

August 5, 2021

Laura Meyer, AICP
Environmental Manager
Jacobs Engineering
Transmission via email: laura.meyer@jacobs.com

Re: Town of Wellington Wastewater Treatment Plant
6172 NE Frontage Road, Wellington CO 80549
SE¼ NW¼ & SW¼ NE¼ Section 10, Twp. 8 North, Rng. 68 West, 6th P.M.
Water Division 1, Water District 3, Larimer County

Ms. Meyer:

In response to your request for comments regarding the proposed improvements and capacity expansion for the existing wastewater treatment plant serving the Town of Wellington, the Colorado Division of Water Resources offers the following comments. Our comments are based upon the limited information provided in your letter and are restricted to the potential impacts this project has to water resources and the protection of other vested water rights.

The existing wastewater treatment plant (“WWTP”) has a current capacity of 0.9 million gallons per day. According to your letter, flows and loads to the plant are nearing existing capacity as a result of growth within the Town of Wellington. In addition, the existing facilities are aging, and improvements will be needed to meet more stringent nutrient removal regulations in the near future. The project seeks to increase the capacity of the plant to 1.75 million gallons per day and will involve new influent screening, grit removal, and influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. All improvements will occur within the existing WWTP property, situated on an approximately 15-acre parcel owned by the Town of Wellington located southeast of the town limits on the east side of the I-25 frontage road.

The existing facility discharges to Box Elder Creek adjacent to the property in the SW¼ of the NE¼ of Section 10, Twp. 8 North, Rng. 68 West, 6th P.M. Box Elder Creek is an intermittent stream at this location. The increased discharge as a result of the proposed improvements to the WWTP (approximately 1.3 cfs) is not expected to cause any issues for downstream water users.

If any work is done in or near the river that could alter flows or otherwise negatively impact downstream water users, the Town of Wellington and/or their construction company will need to coordinate with the District 3 Water Commissioner (Mark Simpson; 970-370-0296; mark.simpson@state.co.us). Wellington may also need to obtain a Section 404 permit from the U.S. Army Corps of Engineers prior to the commencement of any construction within the river bed, which is not currently proposed.

Should you or the Town have any questions regarding this matter, please contact me at this office (303-866-3581 ext. 8249 or sarah.brucker@state.co.us).

Sincerely,



Sarah Brucker, P.E.
Water Resources Engineer

Cc: Mark Simpson, Water Commissioner, District 3 (mark.simpson@state.co.us)
Referral file no. 28815

From: Riddle, Mary R <Mary_Riddle@nps.gov>
Sent: Thursday, August 5, 2021 5:03 PM
To: Meyer, Laura <Laura.Meyer@jacobs.com>
Subject: Re: [EXTERNAL] FW: Town of Wellington WWTP EA - Scoping Letter

Laura:

Apologies for being so late in replying. The NPS does not have any concerns about this project in regards to water quality and potential impacts on the Cache La Poudre Wild and Scenic River.

Thank you for including us in your scoping for this project.

Mary

Mary Riddle (she/her/hers)

406.890.4247 (cell) | ☎ 406. 888.7898 ✉ mary_riddle@nps.gov | 🌐 www.nps.gov/glac

Chief of Planning and Environmental Compliance

Glacier National Park

PO Box 1

West Glacier, MT 59936

Currently Teleworking.

From: Montgomery, Matthew R CIV USARMY CENWO (USA)
<Matthew.R.Montgomery@usace.army.mil>
Sent: Thursday, August 5, 2021 4:04 PM
To: Meyer, Laura <Laura.Meyer@jacobs.com>
Cc: Snider, Kile/LVD <Kile.Snider@jacobs.com>; David Myer <myerdk@wellingtoncolorado.gov>
Subject: [EXTERNAL] RE: Town of Wellington WWTP EA - Scoping Letter

This project has been reviewed in accordance with Section 404 of the Clean Water Act under which the U.S. Army Corps of Engineers regulates the discharge of dredge and fill material and certain excavation activities in waters of the United States. Waters of the U.S. includes ephemeral, intermittent and perennial streams, their surface connected wetlands and adjacent wetlands and certain lakes, ponds, drainage ditches and irrigation ditches that have a nexus to interstate commerce. As described, no fill material would be placed into a waters of the U.S. as a result of the project. Based on the information provided, a Department of the Army permit will not be required for this activity.

Although a Department of the Army permit will not be required for this activity, this does not eliminate the requirements that other applicable federal, state, tribal, and local permits are obtained if needed. Please be advised that deviations from the original plans and specifications of this project could require additional authorization from this office.

If there are any questions please feel free to contact me at the info below.

Matt Montgomery
Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80128
(720) 922-3852



October 5, 2021

Mark Thomas, Manager

North Front Range Water Quality Planning Association
257 Johnstown Center Drive, Unit 206
Johnstown, CO 80534

Subject: Wellington Population Projections and Growth Management Areas

Dear Mr. Thomas,

The purpose of this letter is to provide information on several ancillary questions that may arise regarding the Town's various infrastructure and land-use master planning efforts. The Town of Wellington recently embarked on several master planning efforts, including two Utility related master plans (Wastewater Treatment Plant Master Plan and Collection System Master Plan) and a community Comprehensive Plan. We hope to clarify terminology used in these plans and explain any apparent discrepancies in population numbers or other assumptions between plans.

The Comprehensive Plan illustrates a future land use map (page 14) which defines the "Growth Management Area" (GMA) within the context of that document. This GMA is synonymous with the Urban Growth Boundary (UGB) as defined in the North Front Range Water Quality Planning Association (NFRWQPA) guidance document (with the exception that it is not yet officially codified through a Memorandum of Understanding [MOU] or an Inter-Governmental Agreement [IGA] with Larimer County), and in the context of the Town's Comprehensive Plan is indicative of the ultimate land use planning area for which the Town may expect to provide municipal services. Those municipal services may or may not include water and wastewater utility services.

The attached Figure 1 illustrates the same ultimate land use planning area from the Comprehensive Plan relabeled as the UGB. This boundary should not be confused with the GMA defined in the NFRWQA Utility Plan guidance document as "the area a wastewater provider intends to serve at ultimate development." The definitions section of the NFRWQPA Utility Plan guidance document further defines the term GMA as interchangeable with the term Ultimate Planning area (UPA). The attached Figure 2 illustrates the Town of Wellington GMA and Wastewater Utility Service Area (WUSA) as identical boundaries to be included in the Utility Plan. This boundary represents the areas to provide sewer service as agreed upon during conversations with the Boxelder Sanitation District (BSD) in early September 2021.

A municipal Comprehensive Plan is very high-level and is intended to provide general information regarding the future vision for a municipality. As such, they are subject to regular updates on an on-going basis to keep pace with the more detailed and nuanced infrastructure masterplans such as the one submitted to you for review and approval. In the future, the Town will work with BSD on adopting modifications to the 208-service area boundary to match the urban growth boundary more closely as presented in the Comprehensive Plan.



The Comprehensive Plan also warns that continued growth and development pressure on the Colorado Front Range, when combined with past development patterns and decision-making at the Town of Wellington, if continued without change, could result in a build-out population of up to 41,000 in this ultimate land use planning area. This does not reflect expected population growth, however, as the Town's vision intends that more purposeful development decisions will result in a more appropriate population growth. This more appropriate growth is reflected in the 2040 population projections of 25,000 and the buildout population project of 35,500 developed for our various infrastructure master planning efforts, including the Utility Plan submitted to NFRWQA. That current population projection is attached as Table 1.

We hope this provides the necessary clarity to proceed with our applications for your review and approval. As you know, the Town is on a very tight schedule and our mission to provide adequate utility infrastructure for the Town is of utmost importance to the citizens of Wellington. We greatly appreciate your efforts to this point and stand ready to provide any additional clarification or answer any additional questions as needed.

Sincerely,

Bob Gowing, P.E.

Director of Public Works
Town of Wellington, Colorado

CC: Patti Garcia, Town Administrator, Town of Wellington
Dave Myer, P.E., Project Manager, Town of Wellington
Meagan Smith, Deputy Director of Public Works, Town of Wellington
Kile Snider, P.E., Principal Project Manager, Jacobs

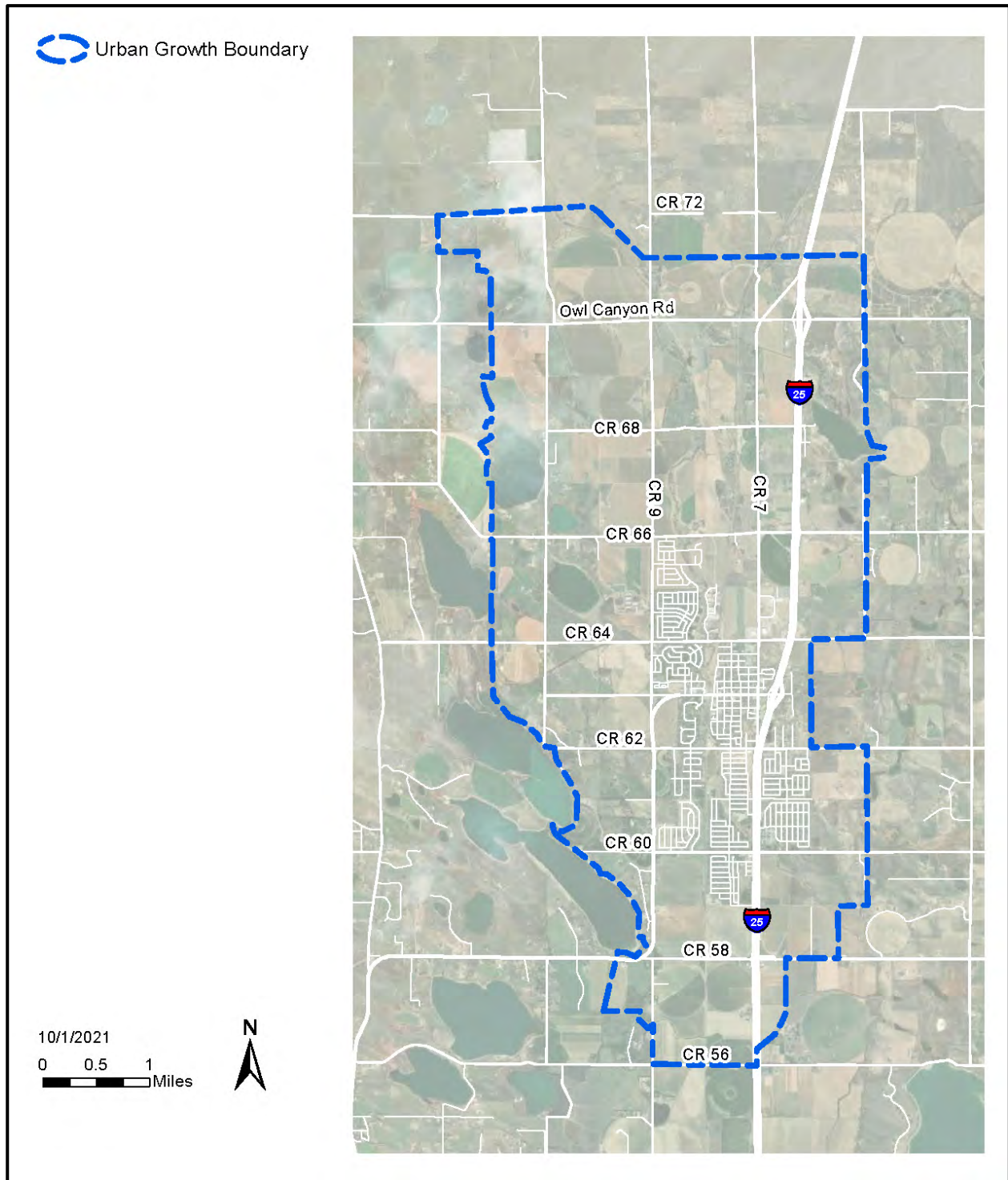


Figure 1. Wellington Urban Growth Boundary

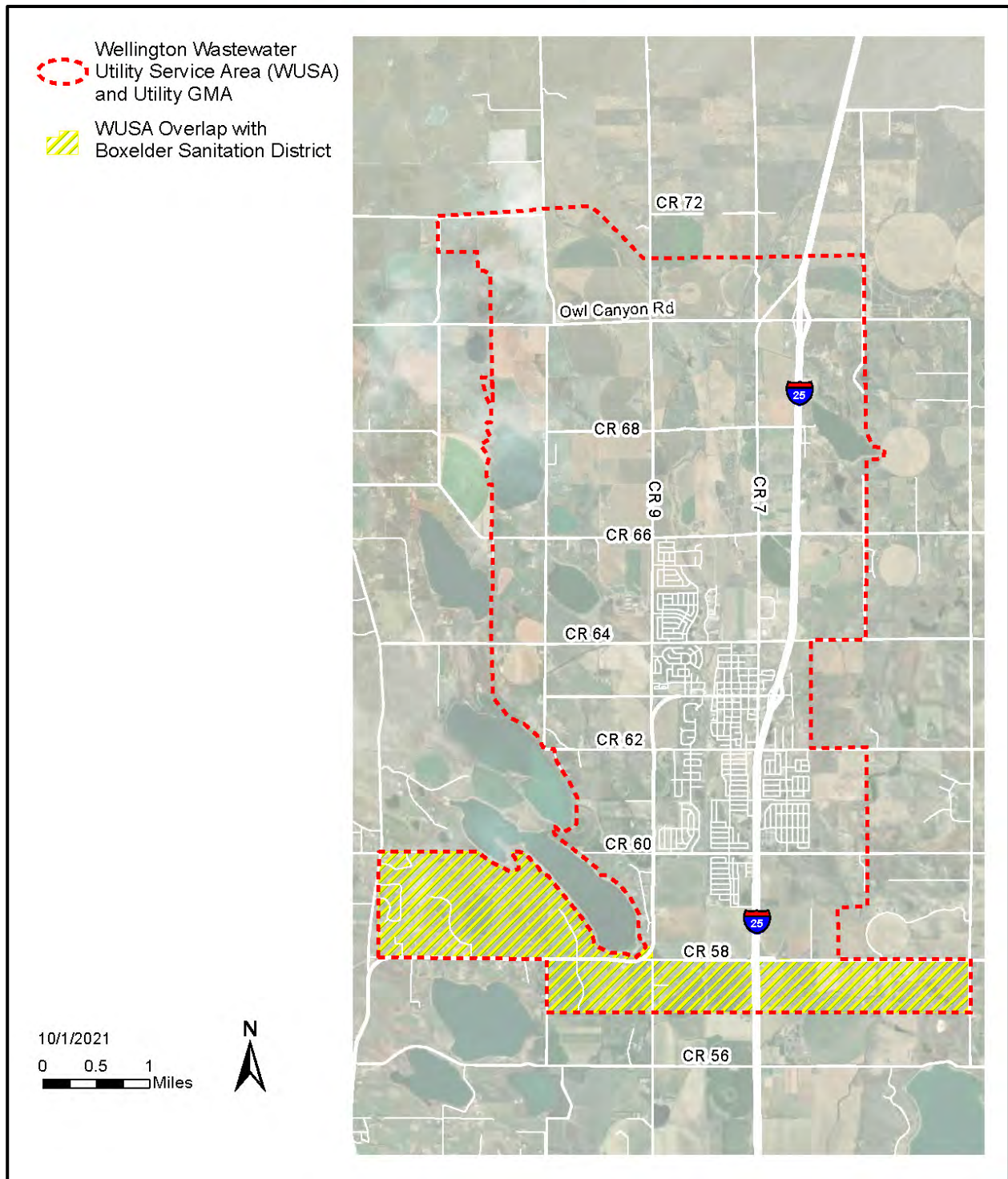


Figure 2. Wellington WUSA and GMA



Table 2. Population Projection

Year	Population Est.	Growth Taper %
2010	6,310	1.70%
2011	6,403	1.47%
2012	6,490	1.36%
2013	6,686	3.02%
2014	7,114	6.40%
2015	7,697	8.20%
2016	8,345	8.42%
2017	9,501	13.85%
2018	9,991	5.15%
2019	10,544	5.54%
2020	11,415	8.25%
2021	11,802	3.39%
2022	12,119	2.68%
2023	12,375	2.11%
2024	12,855	3.88%
2025	13,459	4.70%
2026	14,085	4.65%
2027	14,732	4.60%
2028	15,403	4.55%
2029	16,096	4.50%
2030	16,812	4.45%
2031	17,544	4.35%
2032	18,289	4.25%
2033	19,048	4.15%
2034	19,820	4.05%
2035	20,602	3.95%
2036	21,396	3.85%
2037	22,198	3.75%
2038	23,008	3.65%
2039	23,825	3.55%
2040	24,647	3.45%

From: San Miguel, George L <george_sanmiguel@fws.gov>
Sent: Monday, October 25, 2021 8:05 AM
To: Meyer, Laura <Laura.Meyer@jacobs.com>
Cc: Alms - CDPHE, Matt <matt.alm@state.co.us>
Subject: Re: [EXTERNAL] Proposed Town of Wellington WWTP Expansion - Section 7 Consultation

Hello Laura Meyer,

My original response from July 28, 2021, is sufficient documentation to satisfy section 7 consultation on this project.

George L. San Miguel
Wildlife Biologist
Colorado Ecological Services Field Office
US Fish & Wildlife Service
134 Union Blvd., Suite 670
Lakewood, Colorado 80228
(303)236-4752
George_SanMiguel@FWS.gov

From: Meyer, Laura <Laura.Meyer@jacobs.com>
Sent: Friday, October 22, 2021 2:30 PM
To: San Miguel, George L <george_sanmiguel@fws.gov>
Cc: Alms - CDPHE, Matt <matt.alm@state.co.us>
Subject: [EXTERNAL] Proposed Town of Wellington WWTP Expansion - Section 7 Consultation

Hello Mr. San Miguel

We received your 7/28/2021 email (attached) responding to the 7/21/2021 scoping letter (attached) for the above referenced project. As noted in the scoping letter, a Jacobs biologist has assessed the project and the project study area to identify potential impacts based on the species list from USFWS dated June 17, 2021 (Consultation Code: 06E24000-2021-SLI-0989). As further noted in the scoping letter, the finding of our biologist was that habitat characteristics for the listed species are not present and that no water depletions of the South Platte River system would occur.

Because this is an equivalency project, CDPHE commitments to EPA include Section 7 consultation with USFWS. Please advise if additional documentation is needed to satisfy the requirements for Section 7 consultation on this project.

Respectfully,
Laura L. Meyer, AICP
Jacobs
Senior Project Manager
303.204.6744 mobile
Laura.Meyer@jacobs.com

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United States Department of Agriculture



Natural Resources Conservation Service
Denver Federal Center
Building 56, Room 2604
P.O. Box 25426
Denver, CO 80225

SUBJECT: Farmland Protection Policy Act

November 22nd, 2021

Laura Meyer, AICP
Environmental Manager
Jacobs Engineering
9191 South Jamaica Street
Englewood, Colorado 80112

RE: Information Request for Proposed Town of Wellington Wastewater Treatment Plant Improvement Project

Dear Laura,

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural use. It assures that to the extent possible federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland.

For the purpose of the FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to the FPPA requirements does not have to be currently used for cropland. Projects are subject to the FPPA requirements if they may irreversibly convert farmland to non-agriculture use and are completed by a federal agency or with assistance from a federal agency.

All aspects of this project will occur in existing developed areas or areas committed to urban development. The proposed project is not subject to the FPPA. NRCS encourages the use of accepted erosion control practices during the construction and installation of these projects.

If you have any further questions, please call (720) 544-2855.

Thank you,

A handwritten signature in dark ink, appearing to read "T. Riley Dayberry".

T. Riley Dayberry
Asst. State Soil Scientist
thomas.dayberry@usda.gov

cc:

Eugene Backhaus - State Resource Conservationist, NRCS, Denver CO
Clint Evans – State Conservationist, NRCS, Denver CO
William Shoup - State Soil Scientist, NRCS, Denver CO

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Appendix C:
South Platte Water Related Activities Program, Inc. (SPWRAP) Certification
and
Platte River Recovery Implementation Program (PRRIP) Worksheet

YEAR: 2019

11,484.0 UNITS

CERTIFICATE OF MEMBERSHIP

South Platte Water Related Activities Program, Inc.

CLASS M

Town of Wellington

This certifies that _____, "Member")
has become a Class M member of the South Platte Water Related Activities Program, Inc. (SPWRAP), a non-profit corporation incorporated under the laws of the State of Colorado. This Certificate indicates that Member has paid all assessments owed on its membership through the current year identified above. This membership is not transferable except as may be provided in the Articles or Bylaws of SPWRAP. Additional terms, conditions and limitations pertaining to this membership are printed on the back hereof.

In Witness Whereof, SPWRAP has caused this Certificate to be signed by its duly authorized officer and sealed with the seal of the corporation this 19th day of March, 2021.

Kim Hutton

President



Daniel Haffner

Secretary

Membership in SPWRAP entitles the Member to those rights and privileges specified in the Articles of Incorporation and Bylaws of SPWRAP, as may be amended from time to time, provided said Member is current in payment of annual fees and assessments levied by SPWRAP.

This Member may rely on implementation of the Platte River Recovery Implementation Program ("PRRIP") for Endangered Species Act ("ESA") compliance for its water-related activities affecting flow volume and timing in the central and lower reaches of the Platte River in Nebraska to the extent described in the PRRIP and the June 16, 2006 Programmatic Biological Opinion and August 27, 2018 Supplemental Programmatic Biological Opinion. The following conditions apply to Member's reliance on the PRRIP for ESA compliance purposes: (1) PRRIP coverage for ESA compliance is dependent upon continued implementation of the PRRIP and fulfillment of Colorado's responsibilities under the PRRIP; (2) PRRIP coverage extends to Member's interests in facilities, water rights, and other water-related activities associated with the: i] irrigated acreage for Class A and W members; ii] municipal and domestic water supply system for Class M members; iii] diversions for self-supplied industrial water needs for Class I members; and, iv] depletions for Class X-2 members, upon which Member's Units are based; (3) Member must be current in payment of applicable fees and assessments levied by SPWRAP with respect to Member's Units; (4) PRRIP coverage does not obviate the need to follow procedural requirements of the ESA, including those related to Section 7 consultation, that may be or become applicable to Member or its activities; and (5) PRRIP coverage does not extend to site-specific project impacts that may affect federally listed species or designated critical habitat outside the scope of the PRRIP and Programmatic Biological Opinion. Requirements for PRRIP coverage for ESA compliance are currently known only through the First Increment Extension (end of 2032). Requirements for PRRIP coverage for ESA compliance after that date have not yet been determined.

Any member who is not a natural person must provide to SPWRAP the name of the person authorized to cast votes for that member. Any changes of such authorization must be made in writing and received by SPWRAP not less than 30 days prior to an annual meeting at which such votes are to be cast.

RATIONALE - Membership Units/Assessments

1. The traditional "trigger" for Platte Section 7 compliance, and thus the key driver for membership in SPWRAP, is construction, maintenance and/or operation of structures and facilities diverting out of the South Platte River and its tributaries. A membership covers all facilities of the member entity including diversion, conveyance, storage and other associated structures. Each entity utilizing those should have its own membership and certificate in SPWRAP.
2. Calculation of Units for purposes of assessments is based on the following as more fully described in Article VI.B. of the Articles of Incorporation and board resolutions establishing Class sub-category memberships:
 - Class A: The acreage that is thereby irrigated through that member entity.
 - Class I: The member's diversions, in acre feet.
 - Class I-2 & I-3: The number of O&G wells fracked in the prior year.
 - Class M and X-4: The member's single family equivalent taps, calculated as one SFE per half acre foot of potable water treated by or delivered to the water supply entity.
 - Class W: The irrigated acreage within the member's boundaries.
 - Class X-2: The "small depletion" determination made by the USFWS.
 - Class X-3: An entity that operates a plan for augmentation to replace the depletions caused primarily by rural domestic wells.
 - Class X-5: The member's diversions, in acre feet, of untreated ag. ditch water park & golf course irrigation.
 - Class X-6: The non-municipal member's total acreage in open space programs.
3. Where multiple structures / water rights of different member entities serve the same acreage, flexibility exists to allocate that acreage among the participating entities for purposes of determining assessments.

YEAR: 2020

12,600.0 UNITS

CERTIFICATE OF MEMBERSHIP

South Platte Water Related Activities Program, Inc.

CLASS M

Town of Wellington

This certifies that _____, ("Member")
has become a Class M member of the South Platte Water Related Activities Program, Inc. (SPWRAP), a non-profit corporation incorporated under the laws of the State of Colorado. This Certificate indicates that Member has paid all assessments owed on its membership through the current year identified above. This membership is not transferable except as may be provided in the Articles or Bylaws of SPWRAP. Additional terms, conditions and limitations pertaining to this membership are printed on the back hereof.

In Witness Whereof, SPWRAP has caused this Certificate to be signed by its duly authorized officer and sealed with the seal of the corporation this 19th day of March, 2021.

Kim Hutton

President



Daniel Haffner

Secretary

Membership in SPWRAP entitles the Member to those rights and privileges specified in the Articles of Incorporation and Bylaws of SPWRAP, as may be amended from time to time, provided said Member is current in payment of annual fees and assessments levied by SPWRAP.

This Member may rely on implementation of the Platte River Recovery Implementation Program ("PRRIP") for Endangered Species Act ("ESA") compliance for its water-related activities affecting flow volume and timing in the central and lower reaches of the Platte River in Nebraska to the extent described in the PRRIP and the June 16, 2006 Programmatic Biological Opinion and August 27, 2018 Supplemental Programmatic Biological Opinion. The following conditions apply to Member's reliance on the PRRIP for ESA compliance purposes: (1) PRRIP coverage for ESA compliance is dependent upon continued implementation of the PRRIP and fulfillment of Colorado's responsibilities under the PRRIP; (2) PRRIP coverage extends to Member's interests in facilities, water rights, and other water-related activities associated with the: i] irrigated acreage for Class A and W members; ii] municipal and domestic water supply system for Class M members; iii] diversions for self-supplied industrial water needs for Class I members; and, iv] depletions for Class X-2 members, upon which Member's Units are based; (3) Member must be current in payment of applicable fees and assessments levied by SPWRAP with respect to Member's Units; (4) PRRIP coverage does not obviate the need to follow procedural requirements of the ESA, including those related to Section 7 consultation, that may be or become applicable to Member or its activities; and (5) PRRIP coverage does not extend to site-specific project impacts that may affect federally listed species or designated critical habitat outside the scope of the PRRIP and Programmatic Biological Opinion. Requirements for PRRIP coverage for ESA compliance are currently known only through the First Increment Extension (end of 2032). Requirements for PRRIP coverage for ESA compliance after that date have not yet been determined.

Any member who is not a natural person must provide to SPWRAP the name of the person authorized to cast votes for that member. Any changes of such authorization must be made in writing and received by SPWRAP not less than 30 days prior to an annual meeting at which such votes are to be cast.

RATIONALE - Membership Units/Assessments

1. The traditional "trigger" for Platte Section 7 compliance, and thus the key driver for membership in SPWRAP, is construction, maintenance and/or operation of structures and facilities diverting out of the South Platte River and its tributaries. A membership covers all facilities of the member entity including diversion, conveyance, storage and other associated structures. Each entity utilizing those should have its own membership and certificate in SPWRAP.
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 - Class X-5: The member's diversions, in acre feet, of untreated ag. ditch water park & golf course irrigation.
 - Class X-6: The non-municipal member's total acreage in open space programs.
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YEAR: 2021

13,824.0 UNITS

CERTIFICATE OF MEMBERSHIP

South Platte Water Related Activities Program, Inc.

CLASS M

Town of Wellington

This certifies that _____, ("Member")
has become a Class M member of the South Platte Water Related Activities Program, Inc. (SPWRAP), a non-profit corporation incorporated under the laws of the State of Colorado. This Certificate indicates that Member has paid all assessments owed on its membership through the current year identified above. This membership is not transferable except as may be provided in the Articles or Bylaws of SPWRAP. Additional terms, conditions and limitations pertaining to this membership are printed on the back hereof.

In Witness Whereof, SPWRAP has caused this Certificate to be signed by its duly authorized officer and sealed with the seal of the corporation this 9th day of March, 2021.

Kim Hutton

President



Daniel Gaffner

Secretary

Membership in SPWRAP entitles the Member to those rights and privileges specified in the Articles of Incorporation and Bylaws of SPWRAP, as may be amended from time to time, provided said Member is current in payment of annual fees and assessments levied by SPWRAP.

This Member may rely on implementation of the Platte River Recovery Implementation Program ("PRRIP") for Endangered Species Act ("ESA") compliance for its water-related activities affecting flow volume and timing in the central and lower reaches of the Platte River in Nebraska to the extent described in the PRRIP and the June 16, 2006 Programmatic Biological Opinion and August 27, 2018 Supplemental Programmatic Biological Opinion. The following conditions apply to Member's reliance on the PRRIP for ESA compliance purposes: (1) PRRIP coverage for ESA compliance is dependent upon continued implementation of the PRRIP and fulfillment of Colorado's responsibilities under the PRRIP; (2) PRRIP coverage extends to Member's interests in facilities, water rights, and other water-related activities associated with the: i] irrigated acreage for Class A and W members; ii] municipal and domestic water supply system for Class M members; iii] diversions for self-supplied industrial water needs for Class I members; and, iv] depletions for Class X-2 members, upon which Member's Units are based; (3) Member must be current in payment of applicable fees and assessments levied by SPWRAP with respect to Member's Units; (4) PRRIP coverage does not obviate the need to follow procedural requirements of the ESA, including those related to Section 7 consultation, that may be or become applicable to Member or its activities; and (5) PRRIP coverage does not extend to site-specific project impacts that may affect federally listed species or designated critical habitat outside the scope of the PRRIP and Programmatic Biological Opinion. Requirements for PRRIP coverage for ESA compliance are currently known only through the First Increment Extension (end of 2032). Requirements for PRRIP coverage for ESA compliance after that date have not yet been determined.

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Supplemental Worksheet for PRRIP BA Template

The information below is needed for the U.S. Fish & Wildlife Service (Service) to complete a formal ESA Section 7 consultation in a streamlined manner under the Platte River Recovery Implementation Program (PRRIP), the June 16, 2006 programmatic biological opinion and the August 27, 2018 supplemental biologic opinion. The worksheet can also help the Service determine if consultation is required (see [link](#) for exceptions to the consultation requirements).

1. **Applicant Name:** Town of Wellington
2. **Federal Agency Involved (if applicable):** _____
3. **Project Name/Description of Project or Proposed Action:**
Town of Wellington Wastewater Treatment Plant Expansion Project. The proposed project would increase plant capacity to 1.75 mgd and consist of new influent screening, new grit removal, new influent pumping, additional aeration, additional clarification, new UV disinfection, additional aerobic digestion, additional sludge dewatering, and additional administration facilities. The existing fence on the west side of the plant would be moved farther west to the Town's property limit. All proposed improvements and construction activities would occur within existing property limit owned by the Town for the WWTP.
4. **Project Location (include street address, or comparable, specific location information and County):**
6190 NE Frontage Road
Wellington, Colorado
Larimer County
5. **General Description of Water Source(s) (no need to identify specific/associated water rights):**

a. % Transbasin Imports	<u>0</u> %
b. % Native South Platte Water	<u>4</u> %
c. % Nontributary Groundwater	<u>1</u> %
d. % Other (please specify; e.g., in-basin agricultural conversion, reuse, etc.)	
<u>Recycled effluent</u>	<u>95</u> %
6. **Water Use Classification (check one or both boxes, as applicable):**
 - a. **Water use qualifies as an "existing water related activity"** ☐
(Water use is surface water or hydrologically connected groundwater that has historically been used prior to July 1, 1997)
 - b. **Water use qualifies as a "new water related activity"** ☒
(includes new and expanded existing projects)
(Water use constitutes a new surface water or hydrologically connected groundwater that will occur after July 1, 1997)
7. **Annual Volumetric (acre-feet) water use (existing; new; and future buildout, if applicable) associated with the Project:**
Existing = 9.67 acre-feet; New = 9.67 acre-feet; Future Buildout = 16.57 acre-feet