

Attachment 1



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

Chatfield Watershed Authority Board Meeting
Monday, July 25, 2022
3:00 p. m. – 5:00 p. m.

Board of Directors:

Director Lora Thomas (Chair) – Douglas County
Director Lesley Dahlkemper – Jefferson County
Director Alison Witheridge – Other Districts
Director Laura Cavey (Vice-Chair) – Town of Castle Rock

Alan Leak (RESPEC)
Michael Daugherty (SSD)
Sarah Klahn(SSD)
Kris Wahlers (Chatfield State Park)
Kevin Bierlein (Hydros Consulting)
Ted Snailum (TWS Financial)
Charly Hoehn (Chatfield Reservoir Mitigation Company)
Josh Baile (Dominion WSD)
Kirby Clark (Plum Creek WSD)
Dru Campbell (Douglas County)
Andy Kerr (Jefferson County)
Cathy Begej (Jeffco Conservation District)

Others Present:

Patrick O’Connell (Jefferson County)
Ryan Adrian (Douglas County)
Weston Martin (Plum Creek WSD)
Diane Kielty (Colorado Watershed Assembly)
David Van Dellen (Town of Castle Rock)

3:00 pm

Call to Order

A regular meeting of the Chatfield Watershed Authority was called to order at 3:00 p.m. by Director Thomas. A quorum was declared established. There were no disclosures.

ACTION/APPROVAL ITEMS (3:05 P.M. – 3:30 P.M.)

A. APPROVAL OF AGENDA

It was moved to approve the agenda as presented by Director Dahlkemper and seconded by Director Witheridge; motion carried unanimously.

B. APPROVAL OF MEETING MINUTES

Approval of Chatfield Board April 18, 2022, Meeting Minutes

It was moved by Director Cavey to approve the April 18, 2022 Board meeting minutes and seconded by Director Witheridge; motion carried unanimously.



Authority Board Chair: Lora Thomas
 Authority Board Vice-Chair: Laura Cavey
 TAC Chair: Weston Martin
 TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

C. APPROVAL/RATIFICATION OF INVOICES

The table summarizes the invoices included in the meeting packet.

Total amount of invoices for approval **\$68,935.39**

Invoices < \$5,000 and within Budget and Scope (Manager's Approval)	
Lynker_Credit applied to Balance_03 31 22 Chatfield_Watershed_Invoice	\$180.00
Lynker_Credit applied to Balance_04_01_22 to 04_30_22_Chatfield_Invoice_SI009337	\$120.00
Lynker_Credit applied to Balance_05 31 22 Chatfield_Watershed_Invoice	\$300.00
Lynker Credit applied to balance_06 30 22 Chatfield_Watershed_Invoice	\$300.00
TWS_April Inv_21384_from_TWS_FINANCIAL_INC._7856	\$750.00
TWS_Inv May 2022_21824_from_TWS_FINANCIAL_INC._36760	\$750.00
TWS_June Inv_21870_from_TWS_FINANCIAL_INC._15000	\$750.00
Notchcode_CHA-001.3 invoice-Final Invoice	\$1,648.00
RESPEC_W0035-Chatfield-INV-28FEB22	\$4,917.50
RESPEC_Pine Canyon_3970.02-CWA-INV-31MAY22	\$3,137.50
SSD Invoice 3013463_March 31 2022	\$1,197.00
SSD General Chatfield Invoice 3013770_April 2022	\$3,350.50
SSD WQCC-WQCD Chatfield Invoice 3013753_April 2022	\$180.00
SSD Pine Canyon Chatfield Invoice 3013771_April 2022	\$1,905.50
SSD WQCC-WQCD Chatfield Invoice 3014067_May 2022	\$2,491.54
SSD Pine Canyon Chatfield Invoice 3014068_May 2022	\$872.00
SSD General Chatfield Invoice 3014308_June 2022	\$3,689.50
SSD WQCC-WQCD Chatfield Invoice 3014309_June 2022	\$1,331.84
SSD Reg 73 Chatfield Invoice 3014311_June 2022	\$40.00
Invoices \$5,000 - \$15,000 and within Budget and Scope (TAC Approval*)	
CO Watershed Assembly_Invoice 2022 005 1st Q_Chatfield 2022 005	\$9,450.00
RESPEC_W0035-Chatfield-INV-31MAR22_INV-0322-1246 Revised	\$11,312.50
RESPEC_W0035-Chatfield-INV-30APR22_INV-0422-711	\$14,147.50
RESPEC_W0035-Chatfield-INV-0522_686_31MAY22	\$7,014.51



Authority Board Chair: Lora Thomas
 Authority Board Vice-Chair: Laura Cavey
 TAC Chair: Weston Martin
 TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

Invoices > \$15,000 and/or any Amount not within Budget or Scope (Board Approval)	
*Also requires post-payment Board ratification at next quarterly Board Meeting	

It was moved to approve and ratify the invoices by Director Cavey and seconded by Director Dahlkemper; motion carried unanimously.

**D. AUTHORIZATIONS AND RECOMMENDATIONS: WATER QUALITY CONTROL COMMISSION
 RULEMAKING HEARINGS (ALAN LEAK & MICHAEL DAUGHERTY)**

1. LEGAL STATUS REGULATION 73 (MICHAEL DAUGHERTY)

CDPHE will reach out to all the stakeholders. The Division is in favor of postponement. TAC voted in favor of postponing the Regulation 73 rulemaking hearing.

2. LEGAL STATUS REGULATION 38 (ALAN LEAK)

Legal actions have budgetary impacts. We are on pace for the rulemaking hearing in November. New table values for nitrogen are being introduced because Chatfield reservoir has a swim beach. The proposed new standards would likely go into place in 2023. They propose to change total phosphorus and chlorophyll a. If these changes go into effect it will impact CWA’s ability to meet these standards. The Division has been helping CWA determine historic nitrogen standards. TAC is recommending to the Board financially committing to a joint effort to review the technical consultants’ results that determined the new lake nutrient standard recommendations.

The lake nutrients criteria rulemaking hearing is scheduled for November 14, 2022; prehearing statements are due on August 3, 2022, and party status requests must be filed by August 17, 2022. The Commission released the notice of public rulemaking hearing on July 14, 2022. The cost impact considerations of CWA participation in this rulemaking are in the action memo in the board packet.

[Pages 1-58 Notice 85 31-38-LakesNutrients](#)

[Pages 604-616 Notice 85 31-38-LakesNutrients-2](#)

- a. RECOMMENDATION TO APPROVE CWA FINANCIAL COMMITMENT TO TECHNICAL REVIEW OF REVISED NUTRIENT CRITERIA FOR COLORADO LAKES LEAD BY COLORADO WASTEWATER UTILITY COUNCIL (CWUC) (ALAN LEAK & MICHAEL DAUGHERTY)



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

It was moved by Director Dahlkemper to ratify the \$5,000 expenditure to fund the Colorado Wastewater Utility Council Lakes Nutrients study review effort and seconded by Director Witheridge. Three votes yes, one abstention by Director Witheridge. Motion passed.

It was moved by Director Cavey to recommend that TAC approve the Authority obtaining party status in the November 2022 Lakes Nutrients Rulemaking Hearing process and seconded by Director Witheridge; motion carried unanimously.

b. 2022 BUDGET AMENDMENT FOR REGULATION 38 REVISED NUTRIENT CRITERIA FOR COLORADO LAKES HEARING IN NOVEMBER (ALAN LEAK & MICHAEL DAUGHERTY)

It was moved to approve an amendment to the 2022 budget to increase line item 5001 – Management Fees – Technical from \$77,100 to \$87,100 for an additional \$10,000 made by Director Dahlkemper and second by Director Cavey; motion carried unanimously.

It was moved to approve an amendment to the 2022 budget to increase line item 5005 - Legal – Administrative from \$59,240 to \$84,240 for an additional \$25,000 made by Director Dahlkemper and second by Director Cavey; motion carried unanimously.

Directors are comfortable with decreasing line item 5004 – NPS Projects and Consultants from \$64,000 to \$62,713, adding the Lynker and Notchcode carryovers from the 2021 contracts, and subtract the \$35,000 reallocation from the planned additional watershed modeling and work to link the watershed model with the reservoir model to RESPEC and SSD for the Lakes Nutrients Rulemaking Hearing process. These changes will permit CWA to remain within the total 2022 budget.

Action: Consultants will discuss with TAC outcomes from this meeting and prepare to move forward Lakes Nutrients Criteria party status and continue discussions with the Division about the standards and the possibility of a site-specific approach.

PRESENTATION (3:30 P.M. - 3:50 P.M.)

Chatfield Reservoir 2021 Annual Water Quality Report (Charly Hoehn, Chatfield Reservoir Mitigation Company & Kevin Bierlein, Hydros Consulting) ([Link to Attachment 28](#)) The report may suggest that the reallocation has improved water quality. CRMC will investigate historic nitrogen data. There has been no native storage in the storage pool. Overall, the reservoir can hold 48,000-acre feet. Dam goes up to approximately 55,000 with additional flood storage space. The reservoir is approximately 50% full currently. Presentation available by request.



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

DISCUSSION ITEMS (3:50 P.M. - 4:30 P.M.)

A. BUDGET AND REVENUE FORECAST (ALAN LEAK & MICHAEL DAUGHERTY)

An update was provided with worksheet as backup to reflect changes in forecast.

B. ANNUAL PRESENTATION TO THE WATER QUALITY CONTROL COMMISSION SEPTEMBER 12-13, 2022 (ALAN LEAK)

There was a preview of the draft presentation. RESPEC will provide updates to TAC. A draft final will go to the TAC and Board in September.

UPDATES (4:30 P.M. – 4:55 P.M.)

A. TECHNICAL (ALAN LEAK)

1. CWA Letter to the WQCD regarding the April 6, 2022 Pine Canyon Site Application - Letters included in packet that went to the Division requesting the application not be approved and, if approved, conditions to be placed on it. Given that we have reservoir regulations, a LAMP has greater implications. CWA does not have latitude to allow phosphorus into the system. The letter was submitted on June 8th. The Division has not made a decision.
2. Response actions to Jellystone wasteload allocation violations update - The Division is working on Jellystone compliance issues. RESPEC will be following up with the Division.
3. West Plum Creek Stream Management Plan Update ([Link to 35](#))
<https://sites.google.com/peakfacilitation.com/westplumcreek/home> The plan is underway. The biggest issue has been the lack of rainfall. It is difficult to assess fish in a dry stream. Some activities have been postponed. They have had mixed response from landowners. In October River Network will present update to the TAC.
4. CSM 2022 Field Session Update
 - a. On CWA Website Projects page ([Projects — Chatfield Watershed Authority](#)) The 2022 field session is complete. Six groups were in the field. A deeper study was done at Sterling Ranch and Sellars Gulch. This has been helpful to the Authority for collecting data.

B. MANAGER (DIANE KIELTY)

1. RESPEC contract has been renewed for 2022 / 2023.
2. Lynker Contract Extension to end of 2022 in progress
3. Application Review Request Form is live on website ([Review Request Form — Chatfield Watershed Authority](#))



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

- Minutes from 2020 – 2022 are available on website
([Meeting Minutes – Chatfield Watershed Authority](#))
- Phosphorus Free Initiative Materials on Website
([Education – Chatfield Watershed Authority](#))

Douglas County has made a change in household waste disposal county wide. Any resident can contact waste management, pay a \$30 co-pay, and their waste can be picked up, including electronics for now. Residents can sign-up for a time in the schedule for a pick-up. This program will eventually be administered by the Environmental Health Department in December 2022.

Action: Write up will be provided by Douglas County to include on the CWA website.

C. FINANCIAL (DIANE KIELTY)

- June 2022 Financial Summary - A review was provided.

D. EXECUTIVE SESSION

24-6-402(4)(b) C.R.S. Conferences with an attorney for the purpose of receiving legal advice on specific legal questions.

UPCOMING MEETINGS (4:55 P.M. – 5:00 P.M.)

A. Next Scheduled TAC Meeting:

- Tuesday, August 2, 2022: 2:00 – 4:00 p.m., Google Meet Online

B. Next Scheduled Board Meeting:

- Monday, October 17, 2022: 3:00 – 5:00 p.m., Hybrid Live & Online

Virtual - Google Meet

Live Address - 100 Jefferson County Parkway
Golden, CO 80419

Directions for Chatfield Hybrid Meeting in Jefferson County

Directions and parking details

<https://www.jeffco.us/2051/Driving-Directions>



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

- Parking – once through the roundabout, head toward the building, guests can park in either of the top-level parking areas to the left or right
- Enter the building and go to your left (unsecured side)
- Once at elevators, head to your right and look for signs for Chatfield Watershed Authority/Faye Griffin Room (just pass Hearing Room 1)

4:30 p.m.

Adjournment

ATTACHMENTS

Attachment 1 – Chatfield WA Board Minutes April 18, 2022_v1
Attachment 2- Lynker_Credit on Balance_03 31 22 Chatfield_Watershed_Invoice
Attachment 3- Lynker_04 30 22 Chatfield_Watershed_Invoice
Attachment 4- Lynker_05 31 22 Chatfield_Watershed_Invoice
Attachment 5- Lynker_06 30 22 Chatfield_Watershed_Invoice
Attachment 6- TWS_April Inv_21384_from_TWS_FINANCIAL_INC._7856
Attachment 7- TWS_Inv May 2022_21824_from_TWS_FINANCIAL_INC._36760
Attachment 8- TWS_June Inv_21870_from_TWS_FINANCIAL_INC._15000
Attachment 9- Notchcode_CHA-001.3 invoice-Final Invoice
Attachment 10- Respec_W0035-Chatfield-INV-28FEB22
Attachment 11- RESPEC_Pine Canyon_3970.02-CWA-INV-31MAY22
Attachment 12- SSD Invoice 3013463_March 31 2022
Attachment 13- SSD_CHATFIELD APRIL 2022 INVOICES
Attachment 14- SSD_CHATFIELD INVOICE LISTING 2022 SERVICES TOTALS 05172022
Attachment 15- SSD_CHATFIELD INVOICE LISTING 2022 SERVICES TOTALS 06172022
Attachment 16- SSD_CHATFIELD INVOICE LISTING 2022 SERVICES TOTALS 07132022
Attachment 17- SSD_MultipleInvoices_June 30 2022
Attachment 18- CO Watershed Assembly Invoice 2022 005 1st Q_Chatfield 2022 005
Attachment 19- RESPEC_W0035-Chatfield-INV-31MAR22-Revised
Attachment 20- RESPEC_W0035-Chatfield-INV-30APR22
Attachment 21- RESPEC_W0035-Chatfield-INV-31MAY22
Attachment 22- 07192022 Legal Report for July 2022 Board Meeting (00133783xD2C75)
Attachment 23- Chatfield Watershed Authority Budget Amendment_ ACTION MEMORANDUM_Final



Authority Board Chair: Lora Thomas
Authority Board Vice-Chair: Laura Cavey
TAC Chair: Weston Martin
TAC Vice-Chair: Ryan Adrian

CHATFIELD WATERSHED AUTHORITY BOARD MINUTES

- Attachment 24- Technical Review Partnering_Revised Nutrient Criteria for Colorado Lakes hearing*
- Attachment 25- CEAE_CESA_220630_Quotation*
- Attachment 26 -CWWUC_SOW_220623*
- Attachment 27- CEAE_CESA_220628_Attachment_A*
- Attachment 28- [Link provided](#) - CRMC 2021 Annual Water Quality Monitoring Report 04.28.22*
- Attachment 29- Chatfield Watershed Authority Budget Planning Workbook 2023-2028 Version 7-5-2022*
- Attachment 30- CWA Letter to the WQCD regarding the April 6 2022 Pine Canyon Site Application*
- Attachment 31- Jellystone Enforcement Email with Nuttle*
- Attachment 32- RESPEC Pine Canyon Site Application and Phosphorus Trade Review Memo 6_8_2022*
- Attachment 33 -SMP_West Plum_Committee Agreements_FINAL*
- Attachment 34 -SMP_West Plum_Final Engagement Plan*
- Attachment 35- [Link Provided](#) - WPC_SHA_dft_20220628*
- Attachment 36- CWA June 2022 Financial Summary_20220719124216*

Attachment 2



Bill To:

Chatfield Watershed Autho
 Attn: Diane Keilty
 P.O. Box 460736
 Denver, CO 80246

Remit To:

RESPEC
 Attn: Accounts Receivable
 P.O. Box 725
 Rapid City, SD 57709-0725

Phone (605) 394-6400, FAX (605) 394-6514

Contract Number :

Invoice Date

06/30/22

Purchase Order No.

Payment Terms :

NET 30

RESPEC Project Number :

W0035.22002

Invoice No.

INV-0622-948

Invoice Period:

06/01/2022 - 6/30/2022

June 2021 - May 2022 Contract

Description	Budget	Previous Billings	Current Billings	Billed to Date	Amount Remaining	Percent Complete	Amount Due This Invoice
Board & Committee Support	\$21,190.00		\$615.00	\$615.00	\$20,575.00	2.90%	\$615.00
Water Quality Monitoring Data	\$9,410.00				\$9,410.00		
Regulatory Technical Support	\$18,975.00		\$512.50	\$512.50	\$18,462.50	2.70%	\$512.50
Advancing Strategic Initiatives	\$27,760.00		\$102.50	\$102.50	\$27,657.50	0.37%	\$102.50
Direct Expenses	\$360.00				\$360.00		
Grand Total	\$77,695.00		\$1,230.00	\$1,230.00	\$76,465.00	1.58%	\$1,230.00
AMOUNT DUE THIS INVOICE							\$1,230.00



Invoice Supporting Information

Cost Category	PLC Desc	RESPEC Project No.	Name	Week Ending Date	Hours	Billing Rate	Amount To Bill	Reference #	Description
Labor	Principal	W0035.22002.001	Leak, Alan J	06/11/22	2.50	\$205.00	\$512.50		Labor Hours
	Principal	W0035.22002.004		06/18/22	0.50	\$205.00	\$102.50		Labor Hours
	Principal	W0035.22002.003		06/25/22	1.00	\$205.00	\$205.00		Labor Hours
	Principal	W0035.22002.001		06/30/22	0.50	\$205.00	\$102.50		Labor Hours
	Principal	W0035.22002.003		06/30/22	1.50	\$205.00	\$307.50		Labor Hours
					6.00		\$1,230.00		
Labor					6.00		\$1,230.00		
Total					6.00		\$1,230.00		



Task Summary

RESPEC Project ID & Description	Current Hours	Current Dollars
W0035.22002.001 - Board & Committee Support	3.00	\$615.00
W0035.22002.003 - Regulatory Technical Support	2.50	\$512.50
W0035.22002.004 - Advancing Strategic Initiatives	0.50	\$102.50
Overall - Total	6.00	\$1,230.00

Attachment 3



Bill To:

Chatfield Watershed Authority
Attn: Diane Keilty
P.O. Box 460736
Denver, CO 80246

Remit Payment To:

RESPEC
Attn: Accounts Receivable
P.O. Box 725
Rapid City, SD 57709-0725
(605) 394-6400, (605) 394-6514 (FAX)

RESPEC Project Number : 03970.0002

Client Contract No.

Client Purchase Order

Invoice Period :

06/01/2022 - 06/30/2022

Project Description :

2022 - Pine Canyon

Invoice No :

INV-0622-938

Invoice Date :

06/30/22

Payments Terms :

NET 30

Contract Value :

\$14,510.00

Cost Category	Current Dollars	Dollars Billed to Date
Labor	\$307.50	\$12,955.00
Total Costs	\$307.50	\$12,955.00
Total Amount Due in US Dollars	\$307.50	\$12,955.00



Invoice Supporting Information

Cost Category	PLC Desc	RESPEC Project No.	Name	Week Ending Date	Hours	Billing Rate	Amount To Bill	Reference #	Description
Labor	Principal	03970.0002	Leak, Alan J	06/11/22	1.50	\$205.00	\$307.50		Labor Hours
					1.50		\$307.50		
Labor					1.50		\$307.50		
Total					1.50		\$307.50		



Task Summary

RESPEC Project ID & Description	Current Hours	Current Dollars	Hours Billed to Date	Dollars Billed to Date
03970.0002 - 2022 - Pine Canyon	1.50	\$307.50	79.75	\$12,955.00
Overall - Total	1.50	\$307.50	79.75	\$12,955.00

Attachment 4

Colorado Wastewater Utility Council

6795 S. Elati St.
Littleton, CO 80120
T 303-525-5038

www.cwwuc.org



INVOICE

July 22nd, 2022

BILL TO

Diane Kielty
c/o Chatfield Watershed Authority.
P.O. Box 460736
Glendale, CO 80246

INSTRUCTIONS

EIN 26-0031946
501(c)(3) non-profit organization

DESCRIPTION

TOTAL

Voluntary Assessment for Technical Review of Information Related to Development of Revised
Nutrient Criteria for Colorado Lakes

\$5,000.00

TOTAL DUE BY September 1st 2022

\$5,000.00

Please remit to the address above. Thank you for your support!

Attachment 5

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somalaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

COVER SHEET

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kiely, Program Manager

August 12, 2022

Client: 002051

Page: 1

For Professional Services Rendered Through July 31, 2022

ACCOUNT SUMMARY

Matter	Description	Invoice #	Services	Tax	Disbursements	Interest	Total
000001	General	3014636	\$3,518.50	\$0.00	\$140.63	\$0.00	\$3,659.13
000002	WQCD-WQCC	3014637	\$52.00	\$0.00	\$0.00	\$0.00	\$52.00
000006	2022 Lakes Nutrients Rulemal	3014638	\$1,817.50	\$0.00	\$0.00	\$0.00	\$1,817.50
Total Current Charges							\$5,528.63
Previous Balance							\$8,007.88
<i>Less Payments</i>							(\$8,007.88)
PAY THIS AMOUNT							\$5,528.63

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somachlaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

REMITTANCE COPY

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kiely, Program Manager

August 12, 2022

Client: 002051

Page: 1

For Professional Services Rendered Through July 31, 2022

ACCOUNT SUMMARY

Matter	Description	Invoice #	Services	Tax	Disbursements	Interest	Total
000001	General	3014636	\$3,518.50	\$0.00	\$140.63	\$0.00	\$3,659.13
000002	WQCD-WQCC	3014637	\$52.00	\$0.00	\$0.00	\$0.00	\$52.00
000006	2022 Lakes Nutrients Rulemal	3014638	\$1,817.50	\$0.00	\$0.00	\$0.00	\$1,817.50
Total Current Charges							\$5,528.63
Previous Balance							\$8,007.88
<i>Less Payments</i>							(\$8,007.88)
PAY THIS AMOUNT							\$5,528.63

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somalaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kielty, Program Manager

August 12, 2022

Client: 002051

Matter: 000001

Invoice #: 3014636

Resp. Atty: SAK

Page: 1

RE: General

For Professional Services Rendered Through July 31, 2022

Total Services	\$3,518.50
Total Disbursements	\$140.63
Total Current Charges	\$3,659.13
Previous Balance	\$4,004.50
<i>Less Payments</i>	<i>(\$4,004.50)</i>
PAY THIS AMOUNT	\$3,659.13

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Please return this remittance page with your payment. Thank you.

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somachlaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kiely, Program Manager

August 12, 2022

Client: 002051

Matter: 000002

Invoice #: 3014637

Resp. Atty: SAK

Page: 1

RE: WQCD-WQCC

For Professional Services Rendered Through July 31, 2022

Total Services	\$52.00
Total Current Charges	\$52.00
Previous Balance	\$3,379.38
<i>Less Payments</i>	<i>(\$3,379.38)</i>
PAY THIS AMOUNT	\$52.00

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Please return this remittance page with your payment. Thank you.

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somachlaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kielty, Program Manager

August 12, 2022

Client: 002051

Matter: 000006

Invoice #: 3014638

Resp. Atty: SAK

Page: 1

RE: 2022 Lakes Nutrients Rulemaking Hearing

For Professional Services Rendered Through July 31, 2022

Total Services	\$1,817.50
Total Current Charges	\$1,817.50
Previous Balance	\$624.00
<i>Less Payments</i>	<i>(\$624.00)</i>
PAY THIS AMOUNT	\$1,817.50

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Please return this remittance page with your payment. Thank you.

Attachment 6

TWS FINANCIAL INC.

CERTIFIED PUBLIC ACCOUNTANTS
6901 S. Pierce St. #200
LITTLETON CO. 80128
(303) 933-4207

Invoice

Date	Invoice #
9/6/2022	21989

Bill To
Chatfield Watershed Authority 4255 N. US Highway 85 Castle Rock, Co 80108

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	July 31, 2022 Financial Statement Prep.	750.00	750.00
Thank you for your business.		Total	\$750.00

Attachment 7

TWS FINANCIAL INC.

CERTIFIED PUBLIC ACCOUNTANTS
6901 S. Pierce St. #200
LITTLETON CO. 80128
(303) 933-4207

Invoice

Date	Invoice #
9/6/2022	21990

Bill To
Chatfield Watershed Authority 4255 N. US Highway 85 Castle Rock, Co 80108

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	August 31, 2022 Financial Statement Prep.	750.00	750.00
Thank you for your business.		Total	\$750.00

Attachment 8

TWS FINANCIAL INC.

CERTIFIED PUBLIC ACCOUNTANTS
6901 S. Pierce St. #200
LITTLETON CO. 80128
(303) 933-4207

Invoice

Date	Invoice #
10/7/2022	22033

Bill To
Chatfield Watershed Authority 4255 N. US Highway 85 Castle Rock, Co 80108

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
	September 30 2022 Financial Statement Prep.	750.00	750.00
Thank you for your business.			Total \$750.00

Attachment 9

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somalaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

COVER SHEET

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kielty, Program Manager

September 15, 2022

Client: 002051

Page: 1

For Professional Services Rendered Through August 31, 2022

ACCOUNT SUMMARY

Matter	Description	Invoice #	Services	Tax	Disbursements	Interest	Total
000001	General	3014848	\$1,573.00	\$0.00	\$0.00	\$0.00	\$1,573.00
000002	WQCD-WQCC	3014849	\$126.00	\$0.00	\$0.00	\$0.00	\$126.00
000004	Reg. 73 Triennial Review	3014850	\$78.00	\$0.00	\$0.00	\$0.00	\$78.00
000006	2022 Lakes Nutrients Rulemal	3014851	\$11,865.00	\$0.00	\$0.00	\$0.00	\$11,865.00
Total Current Charges							\$13,642.00
Previous Balance							\$5,568.63
<i>Less Payments</i>							(\$40.00)
PAY THIS AMOUNT							\$19,170.63

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Somach Simmons & Dunn

Attorneys at Law

500 Capitol Mall, Suite 1000

Sacramento, California 95814

Federal Tax I.D. No.: 68-0261618

somalchlaw.com

Telephone: (916) 446-7979

Fax: (916) 446-8199

REMITTANCE COPY

Chatfield Watershed Authority

P.O. Box 460736

Glendale, CO 80246-0736

Attention: Diane Kielty, Program Manager

September 15, 2022

Client: 002051

Page: 1

For Professional Services Rendered Through August 31, 2022

ACCOUNT SUMMARY

Matter	Description	Invoice #	Services	Tax	Disbursements	Interest	Total
000001	General	3014848	\$1,573.00	\$0.00	\$0.00	\$0.00	\$1,573.00
000002	WQCD-WQCC	3014849	\$126.00	\$0.00	\$0.00	\$0.00	\$126.00
000004	Reg. 73 Triennial Review	3014850	\$78.00	\$0.00	\$0.00	\$0.00	\$78.00
000006	2022 Lakes Nutrients Rulemal	3014851	\$11,865.00	\$0.00	\$0.00	\$0.00	\$11,865.00
Total Current Charges							\$13,642.00
Previous Balance							\$5,568.63
<i>Less Payments</i>							(\$40.00)
PAY THIS AMOUNT							\$19,170.63

Remittance Advice

Check Payable To:

Somach Simmons & Dunn
Attn.: Accounts Receivable
500 Capitol Mall, Suite 1000
Sacramento, California 95814

Attachment 10



Lynker Technologies, LLC
 202 Church St SE #536
 Leesburg, VA 20175

Invoice

Date 09/15/22 **No.** SI010008

Billing Period 08/01/22 to 08/31/22
 Period of Perf. 07/01/21 to 12/31/22

Bill To
 Chatfield Watershed Authority
 PO Box 460736
 Glendale, Colorado 80246
 USA

Prime Cont. No.	Contract Type	Funded	Funded Fee	% Rem.	Fund. Rem.	Project No.	Due Date
	TM	29,360		84.28	24,745.00	10112-001	10/15/22

Description	Current		ITD		Billing
	Rate	Hrs	Hrs	Billing	
Labor					
TASK 1 Model Discussions					
Joshua Sturtevant (Water Resource Scientist)	100.00		1.00		100.00
William Szafranski (Water Resource Scientist)	120.00		0.25		30.00
TASK 2 Simulate Watershed wo Discharges					
Cameron Wobus (Climate Change Project Lead)	180.00		1.25		225.00
William Szafranski (Water Resource Scientist)	120.00		28.50		3,420.00
TASK 3 Simultate Wasteload Allocation					
William Szafranski (Water Resource Scientist)	120.00	1.00	7.00		840.00
	Labor Subtotal	1.00	38.00		4,615.00
	Withholding			0.00	0.00
	Invoice Subtotal	1.00	38.00		4,615.00
	Sales Tax			0.00	
	Invoice Total			120.00	
	Overpayment			-2245.00	
	Invoice Total			2125.00	

Attachment 11

Invoice to: Chatfield Watershed Authority
P.O. Box 460736
Denver, CO 80246

Project Name

Grantee: Colorado Watershed Assembly

CWA Chatfield 2022 010

Address: P.O. Box 460736
Denver, CO 80246

2nd Q

Phone No.: (303)345-1675

Contract or Purchase

Order No.:

Contract Amount:

Date of Invoice: August 15, 2022

Task	Description	Total	Previously	Current	Remaining	Percent
1	Chatfield Management	\$36,050	\$7,450	\$7,160	\$21,440	40.5%
2	Chatfield Website Management	\$3,708	\$2,000	\$1,210	\$498	86.6%
	TOTALS	\$39,758	\$9,450	\$8,370	\$21,938	

Submitted by: Casey Davenhill

Title: Executive Director, Colorado Watershed Assembly

Signature: 

August 29, 2022

Attachment 12



Bill To:

Chatfield Watershed Autho
 Attn: Diane Keilty
 P.O. Box 460736
 Denver, CO 80246

Remit To:

RESPEC
 Attn: Accounts Receivable
 P.O. Box 725
 Rapid City, SD 57709-0725

Phone (605) 394-6400, FAX (605) 394-6514

Contract Number :	Invoice Date	08/26/22
Purchase Order No.	Payment Terms :	NET 30
RESPEC Project Number :	Invoice No.	INV-0722-1223
W0035.22002	Invoice Period:	07/01/2022 - 07/31/2022

June 2021 - May 2022 Contract

Description	Budget	Previous Billings	Current Billings	Billed to Date	Amount Remaining	Percent Complete	Amount Due This Invoice
Board & Committee Support	\$21,190.00	\$615.00	\$2,255.00	\$2,870.00	\$18,320.00	13.54%	\$2,255.00
Water Quality Monitoring Data	\$9,410.00				\$9,410.00		
Regulatory Technical Support	\$18,975.00	\$512.50	\$2,665.00	\$3,177.50	\$15,797.50	16.75%	\$2,665.00
Advancing Strategic Initiatives	\$27,760.00	\$102.50	\$410.00	\$512.50	\$27,247.50	1.85%	\$410.00
Direct Expenses	\$360.00				\$360.00		
Grand Total	\$77,695.00	\$1,230.00	\$5,330.00	\$6,560.00	\$71,135.00	8.443%	\$5,330.00
AMOUNT DUE THIS INVOICE							\$5,330.00



Invoice Supporting Information

Cost Category	PLC Desc	RESPEC Project No.	Name	Week Ending Date	Hours	Billing Rate	Amount To Bill	Reference #	Description
Labor	Principal	W0035.22002.001	Leak, Alan J	07/09/22	2.00	\$205.00	\$410.00		Labor Hours
	Principal	W0035.22002.003		07/09/22	4.50	\$205.00	\$922.50		Labor Hours
	Principal	W0035.22002.001		07/16/22	2.00	\$205.00	\$410.00		Labor Hours
	Principal	W0035.22002.003		07/16/22	1.50	\$205.00	\$307.50		Labor Hours
	Principal	W0035.22002.004		07/16/22	1.50	\$205.00	\$307.50		Labor Hours
	Principal	W0035.22002.001		07/23/22	4.00	\$205.00	\$820.00		Labor Hours
	Principal	W0035.22002.003		07/23/22	1.00	\$205.00	\$205.00		Labor Hours
	Principal	W0035.22002.004		07/23/22	0.50	\$205.00	\$102.50		Labor Hours
	Principal	W0035.22002.001		07/30/22	3.00	\$205.00	\$615.00		Labor Hours
	Principal	W0035.22002.003		07/30/22	6.00	\$205.00	\$1,230.00		Labor Hours
					26.00		\$5,330.00		
Labor					26.00		\$5,330.00		
Total					26.00		\$5,330.00		



Task Summary

RESPEC Project ID & Description	Current Hours	Current Dollars	Hours Billed to Date	Dollars Billed to Date
W0035.22002.001 - Board & Committee Support	11.00	\$2,255.00	14.00	\$2,870.00
W0035.22002.003 - Regulatory Technical Support	13.00	\$2,665.00	15.50	\$3,177.50
W0035.22002.004 - Advancing Strategic Initiatives	2.00	\$410.00	2.50	\$512.50
Overall - Total	26.00	\$5,330.00	32.00	\$6,560.00

Attachment 13



Bill To:

Chatfield Watershed Autho
 Attn: Diane Keilty
 P.O. Box 460736
 Denver, CO 80246

Remit To:

RESPEC
 Attn: Accounts Receivable
 P.O. Box 725
 Rapid City, SD 57709-0725

Phone (605) 394-6400, FAX (605) 394-6514

Contract Number :	Invoice Date	08/31/22
Purchase Order No.	Payment Terms :	NET 30
RESPEC Project Number :	Invoice No.	INV-0822-1547
W0035.22002	Invoice Period:	08/01/2022 - 08/31/2022

June 2021 - May 2022 Contract

Description	Budget	Previous Billings	Current Billings	Billed to Date	Amount Remaining	Percent Complete	Amount Due This Invoice
Board & Committee Support	\$21,190.00	\$2,870.00	\$410.00	\$3,280.00	\$17,910.00	15.48%	\$410.00
Water Quality Monitoring Data	\$9,410.00		\$3,540.00	\$3,540.00	\$5,870.00	37.62%	\$3,540.00
Regulatory Technical Support	\$18,975.00	\$3,177.50	\$5,330.00	\$8,507.50	\$10,467.50	44.84%	\$5,330.00
Advancing Strategic Initiatives	\$27,760.00	\$512.50		\$512.50	\$27,247.50	1.85%	
Direct Expenses	\$360.00				\$360.00		
Grand Total	\$77,695.00	\$6,560.00	\$9,280.00	\$15,840.00	\$61,855.00	20.387%	\$9,280.00
AMOUNT DUE THIS INVOICE							\$9,280.00



Invoice Supporting Information

Cost Category	PLC Desc	RESPEC Project No.	Name	Week Ending Date	Hours	Billing Rate	Amount To Bill	Reference #	Description	
Labor	Principal	W0035.22002.001	Leak, Alan J	08/06/22	2.00	\$205.00	\$410.00		Labor Hours	
	Principal	W0035.22002.003		08/06/22	9.50	\$205.00	\$1,947.50		Labor Hours	
	Principal	W0035.22002.003		08/13/22	2.00	\$205.00	\$410.00		Labor Hours	
	Principal	W0035.22002.003		08/20/22	11.00	\$205.00	\$2,255.00		Labor Hours	
	Principal	W0035.22002.003		08/27/22	2.50	\$205.00	\$512.50		Labor Hours	
	Principal	W0035.22002.003		08/31/22	1.00	\$205.00	\$205.00		Labor Hours	
						28.00		\$5,740.00		
	Project Engineer	W0035.22002.002	Lohmann, Jenna E	08/20/22	18.00	\$120.00	\$2,160.00		Labor Hours	
	Project Engineer	W0035.22002.002		08/27/22	11.50	\$120.00	\$1,380.00		Labor Hours	
						29.50		\$3,540.00		
Labor					57.50		\$9,280.00			
Total					57.50		\$9,280.00			



Task Summary

RESPEC Project ID & Description	Current Hours	Current Dollars	Hours Billed to Date	Dollars Billed to Date
W0035.22002.001 - Board & Committee Support	2.00	\$410.00	16.00	\$3,280.00
W0035.22002.002 - Water Quality Monitoring Data	29.50	\$3,540.00	29.50	\$3,540.00
W0035.22002.003 - Regulatory Technical Support	26.00	\$5,330.00	41.50	\$8,507.50
W0035.22002.004 - Advancing Strategic Initiatives			2.50	\$512.50
Overall - Total	57.50	\$9,280.00	89.50	\$15,840.00

Attachment 14

Invoice Listing

Sort Order: Client-Matter

Invoices Sorted by: Invoice Number

Selection: Chatfield Watershed Authority - All Matters

Posted Invoices

Invoices Dated: 2/1/2022 - 09/15/2022

Matter Name	Matter Code	Invoice #	Invoice Date	Fees	Expenses	Costs	Interest	Total	2022 Totals
General	1	3014848	9/15/2022	1,573.00	-	-	-	1,573.00	21,935.13
WQCD-WQCC	2	3014849	9/15/2022	126.00	-	-	-	126.00	4,077.38
Pine Canyon Application	3	*	*	*	*	*	*	*	2,777.50
Reg. 73 Triennial Review	4	3014850	9/15/2022	78.00	-	-	-	78.00	1,220.00
Policy Revision Project	5	*	*	*	*	*	*	*	1,512.00
2022 Lakes Nutrients Rulemaking Hearing	6	3014851	9/15/2022	11,865.00	-	-	-	11,865.00	14,306.50
Client Year Totals				\$ 13,642.00	\$ -	\$ -	\$ -	\$ 13,642.00	\$ 45,828.51

* No Invoice This Month

2022 Budget	\$ 84,240.00	
Amount Billed	\$ 45,828.51	54.4%
Budget Remaining	\$ 38,411.49	45.6%

Invoice Listing

Sort Order: Department
 Selection: Filters Set (1)
 Invoices Dated: 2/1/2022 - 9/15/2022

Invoices Sorted by: Client-Mater
 Posted Invoices
 Void Invoices
 Unposted Invoices

Client	Matter	Invoice #	Invoice Date	Fees	Expenses	Costs	Interest	Tax	Total	
Default Department										
002051 CHATFIELD WATERSHED AUTHORITY										
		000001	3012879	02/14/2022	\$5,958.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,958.00
		000001	3013172	03/15/2022	\$2,508.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,508.00
		000001	3013463	04/20/2022	\$1,197.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,197.00
		000001	3013770	05/17/2022	\$3,350.50	\$0.00	\$0.00	\$0.00	\$0.00	\$3,350.50
		000001	3014308	07/13/2022	\$3,633.50	\$0.00	\$56.00	\$0.00	\$0.00	\$3,689.50
		000001	3014636	08/12/2022	\$3,518.50	\$0.00	\$140.63	\$0.00	\$0.00	\$3,659.13
		000001	3014848	09/15/2022	\$1,573.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,573.00
					\$21,738.50	\$0.00	\$196.63	\$0.00	\$0.00	\$21,935.13
		000002	3012880	02/14/2022	\$520.00	\$0.00	\$0.00	\$0.00	\$0.00	\$520.00
		000002	3013753	05/17/2022	\$180.00	\$0.00	\$0.00	\$0.00	\$0.00	\$180.00
		000002	3014067	06/17/2022	\$2,353.00	\$0.00	\$138.54	\$0.00	\$0.00	\$2,491.54
		000002	3014417	07/13/2022	\$650.00	\$0.00	\$57.84	\$0.00	\$0.00	\$707.84
		000002	3014637	08/12/2022	\$52.00	\$0.00	\$0.00	\$0.00	\$0.00	\$52.00
		000002	3014849	09/15/2022	\$126.00	\$0.00	\$0.00	\$0.00	\$0.00	\$126.00
					\$3,881.00	\$0.00	\$196.38	\$0.00	\$0.00	\$4,077.38
		000003	3013771	05/17/2022	\$1,905.50	\$0.00	\$0.00	\$0.00	\$0.00	\$1,905.50
		000003	3014068	06/17/2022	\$872.00	\$0.00	\$0.00	\$0.00	\$0.00	\$872.00
					\$2,777.50	\$0.00	\$0.00	\$0.00	\$0.00	\$2,777.50
		000004	3012881	02/14/2022	\$598.00	\$0.00	\$0.00	\$0.00	\$0.00	\$598.00
		000004	3013173	03/15/2022	\$504.00	\$0.00	\$0.00	\$0.00	\$0.00	\$504.00
		000004	3014311	07/13/2022	\$40.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40.00
		000004	3014850	09/15/2022	\$78.00	\$0.00	\$0.00	\$0.00	\$0.00	\$78.00
					\$1,220.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,220.00
		000005	3012882	02/14/2022	\$1,380.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,380.00
		000005	3013174	03/15/2022	\$132.00	\$0.00	\$0.00	\$0.00	\$0.00	\$132.00
					\$1,512.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,512.00
		000006	3014418	07/13/2022	\$624.00	\$0.00	\$0.00	\$0.00	\$0.00	\$624.00
		000006	3014638	08/12/2022	\$1,817.50	\$0.00	\$0.00	\$0.00	\$0.00	\$1,817.50
		000006	3014851	09/15/2022	\$11,865.00	\$0.00	\$0.00	\$0.00	\$0.00	\$11,865.00
					\$14,306.50	\$0.00	\$0.00	\$0.00	\$0.00	\$14,306.50
					\$45,435.50	\$0.00	\$393.01	\$0.00	\$0.00	\$45,828.51

Attachment 15

ACTION MEMORANDUM CHATFIELD WATERSHED AUTHORITY

Date: October 17, 2022

TO: CWA Board

FROM: Alan J. Leak, P.E., Technical Consultant

SUBJECT: 2023 CWA Dues.

SUMMARY OF ACTION REQUESTED: Recommendation for approval of the proposed 2023 CWA Dues.

RECOMMENDED EFFECTIVE DATE: January 1, 2023

COST IMPACTS: The budget for 2023 and projections for 2024 and beyond have yet to be finalized. Once finalized and if approved by the CWA Board, expenses for 2023 and 2024 may increase over what is currently budgeted. The proposed 2023 dues are expected to cover these proposed increases in expenses through 2023.

PURPOSE / BACKGROUND: In 2022, the CWA Budget Committee reviewed several potential long-term (2022-2028) budget options for the CWA. Based on that review, the Budget Committee recommended that dues be increased by 20% for 2022 and be budgeted at that level through 2024. The CWA Board approved a dues increase of 20% for 2022. The current proposed long-term budget (2023-2028) may actually show an increased need for 2024 and beyond, depending on the CWA Board direction on the long-term budget items. The draft 2023-2028 budget planning workbook has showed that, without maintaining the 2022 20 % increased dues for 2023 and 2024, the Authority would not be able to continue to fund the basic programs and functions of the Authority while participating in the regulatory rulemaking hearings and proceedings that effect the Authority's members. The 2022 Budget Committee's recommendation was to maintain a healthy fund balance in anticipation of larger expenses in the future for the engineering and legal expanses anticipated for the upcoming regulatory processes.

TAC RECOMMENDATION(S): Recommend the Board adopt the proposed 2023 dues as presented in the 2023 CWA Dues Worksheet.

PROPOSED MOTION to BOARD: Approve the proposed 2023 dues as presented in the 2023 CWA Dues Worksheet.

Attachment: 2023 CWA Dues Worksheet

2023 CWA Dues Worksheet

Yearly Dues Established in the 2016 Bylaws and Subsequent Revisions				Adopted 2022 Dues	Total Proposed 2023 Dues
\$150,000/Year Split Between these 3 Entities	Entity	%	Dues		
	Jefferson County	16.10%	\$24,155	\$28,986	\$28,986
	Douglas County	41.95%	\$62,925	\$75,510	\$75,510
	Castle Rock	41.95%	\$62,925	\$75,510	\$75,510
	Plum Creek WRA	*	\$2,000	\$2,400	\$2,400
	Roxborough Park		\$2,000	\$2,400	\$2,400
	Castle Pines Metro District		\$2,000	\$2,400	\$2,400
	Perry Park W&S District		\$2,000	\$2,400	\$2,400
	Denver Water Department	*	\$2,000	\$2,400	\$2,400
	City of Littleton		\$2,000	\$2,400	\$2,400
	Centennial W&S District	*	\$2,000	\$2,400	\$2,400
	Town of Larkspur		\$2,000	\$2,400	\$2,400
	Louviers Water & San. District		\$2,000	\$2,400	\$2,400
	Sacred Heart		\$2,000	\$2,400	\$2,400
	Dominion W&S District	*	\$2,000	\$2,400	\$2,400
	Total		\$172,005	\$206,406	\$206,406
	* Entities also providing In-kind Services				

Attachment 16

ACTION MEMORANDUM CHATFIELD WATERSHED AUTHORITY

DATE: October 11, 2022

TO: Chatfield Watershed Authority (CWA) Board of Directors (Board)

FROM: Michael Daugherty, Somach Simmons & Dunn (SSD)

SUBJECT: Options to seek additional funding from the State for CWA's water quality efforts

SUMMARY OF ACTION REQUESTED:

The Board should vote on which of the following options it would like CWA to take regarding the options that SSD has explored for sources of additional funding. The options are as follows:

1. Discontinue effort to pursue additional funding.
2. Postpone effort until the lakes nutrients rulemaking proceeding has concluded (April 2023), at which point CWA can re-evaluate its budget for such an effort.
3. Pursue additional discussions with Colorado Parks and Wildlife (CPW) and the Department of Natural Resources (DNR) regarding sources of potential additional funding for CWA.
4. Consider amending state statute to provide a source of funding for CWA.
 - This effort would require the expenditure of money to retain a lobbyist.
 - Options include seeking legislation that (1) provides CWA with a portion of CPW's Keep Colorado Wild Pass and (2) authorizes DNR to charge a park user fee at Chatfield State Park to help fund CWA. We could also explore alternative legislative options with a lobbyist.

COST IMPACTS:

The four (4) options described above vary in their cost. Option 1 would require no expenditure of money, and would result in no additional funding for CWA. Option 2 would require no immediate expenditure of money, and would result in no immediate additional funding for CWA, but would leave the door open for future discussions. Option 3 would require some expenditure of money for consultant time dedicated to CPW/DNR negotiations, and may or may not result in any additional funding, depending on the result of those negotiations. Option 4 would require significant expenditure of money (\$25,000-\$40,000 depending on the chosen lobbyist), and may result in significant additional funding for CWA, but could also result in no additional funding if the legislative effort is not successful.

PURPOSE / BACKGROUND:

At the May 3, 2022, TAC meeting, TAC directed SSD to contact CPW and conduct legal research regarding the possibility of CPW providing funds to support CWA's water quality efforts in the Chatfield watershed. Given CPW's response and based on research into CPW's legal authority to direct funds to

CWA, SSD advised the TAC that the best option for pursuing additional funding from the State would be through legislation. The TAC recommended discussing these findings at the July Board meeting.

At the July 25, 2022, Board meeting, the Board discussed various options to pursue additional funding for CWA, including CPW grants and/or legislation similar to existing statutory language for Cherry Creek Basin Water Quality Authority (CCBWQA) related to a park user fee. The Board recommended TAC continue to investigate these options.

Following additional investigation, SSD determined that if CWA wishes to pursue additional funding through legislation, CWA should retain a lobbyist to handle that effort. At the August 2, 2022, TAC meeting, the TAC directed SSD to investigate the possibility of retaining a lobbyist to handle this effort. SSD prepared a list of potential lobbyist candidates for review at the September TAC meeting.

At the September 13, 2022, TAC meeting, TAC reviewed the list of potential lobbyists and directed SSD to reach out to the lobbyists to discuss the scope, timing, and cost of such an effort in anticipation of presenting that information to the Board. SSD contacted three lobbyist candidates and presented that information to the TAC at the October 4, 2022, TAC meeting.

The next legislative session begins in January 2023 and continues through June 2023. The lobbyists we interviewed indicated that bills proposing new fees often receive significant opposition in the legislature, but that following the November elections there will be a clearer picture of leadership and party dynamics in the legislature. The lobbyists also indicated that CWA could focus its efforts on the 2024 legislative session, which would provide additional time to find a bill sponsor and garner local grassroots support.

PROPOSED MOTION to BOARD:

Below are the four proposed options for seeking additional funding for CWA. SSD recommends the Board discuss the various options and vote to select one. Executive session is available if the Board would prefer to have a candid discussion regarding these options with its lawyer.

Motion to take a vote to select one of the following options:

1. Discontinue effort to pursue additional funding.
2. Postpone effort until the lakes nutrients rulemaking proceeding has concluded (April 2023), at which point CWA can re-evaluate its budget for such an effort.
3. Pursue additional discussions with Colorado Parks and Wildlife (CPW) and the Department of Natural Resources (DNR) regarding sources of potential additional funding for CWA.
4. Consider amending state statute to provide a source of funding for CWA, which would require retaining a lobbyist.

If the Board chooses option #4, the Board should take an additional vote on whether to: (1) seek legislation that provides CWA with a portion of CPW's Keep Colorado Wild Pass, (2) seek legislation that authorizes DNR to charge a park user fee at Chatfield State Park to help fund CWA, (3) seek either of these legislative options, depending on the level of support for each in the legislature, (4) pursue alternative legislative options.

Attachment 17

DISCUSSION MEMORANDUM CHATFIELD WATERSHED AUTHORITY

Date: October 17, 2022

TO: CWA Board

FROM: Alan J. Leak, P.E., Technical Consultant

SUBJECT: Draft 2023 CWA Budget and the 2023-2028 Planning Budget.

SUMMARY OF ACTION REQUESTED: Review and provide comments on the draft 2023 budget and the 2023-2028 planning budget.

RECOMMENDED EFFECTIVE DATE: N/A

COST IMPACTS: The draft 2023 budget includes revenues in the amount of \$280,952 and expenditures in the amount of \$399,098. Assuming the projected starting fund balance in 2023 of \$290,052, the ending fund balance in 2023 is projected to be \$171,906, with expenditures exceeding revenues by \$118,146. Projected revenues and expenditures through 2024 are expected to continue to deplete the CWA's fund balance and will likely fall below the recommended minimum \$100,000 fund balance at the end of 2024. The 2023-2028 planning budget workbook includes estimated additional expenditures for upcoming water quality rulemaking processes and NPS projects should the Board choose to participate in those processes and projects. If so, based on the planning estimates, an additional \$618,457 in revenue will be required from 2024 to 2028 to cover the estimated additional expenditures.

PURPOSE / BACKGROUND: The CWA Board will meet on November 14th, 2022, at which time a final draft 2023 budget will be presented for review and adoption. The CWA TAC advises the Board on budgetary matters and a draft 2023-2028 budget workbook was presented at the October 4, 2022, TAC meeting. At that meeting the TAC discussed the draft 2023-2028 budget workbook and requested that the same, with minor revisions, be presented to the CWA Board for discussion and direction.

Draft 2023 Budget: The draft 2023 budget is based upon the 2022 budget, as modified by previous board actions and input from CWA consultants, and current projections of revenues and expenditures in 2022. Key assumptions in the 2023 budget are as follows:

Dues. In 2022, the CWA Board approved a 20% increase in the 2022 member dues. The proposed 2023 budget assumes that this increase will be carried forward to 2023. The budget also assumes a voluntary dues contribution of \$2,400 from non-members. The monitoring In-kind contributions remain at the same level as in 2022 (Please note that any changes in these contributions are equally reflected as an expense and thus do not impact the end of year balance).

Technical and Legal Fees. At the July 24, 2022, CWA Board meeting the CWA Board approved a budget amendment that added funding in 2022 for the Lakes Nutrients hearing previously

scheduled for November 2022 as well as reallocated funding in other funding categories. That budget amendment increased the previously amended 2022 budget from \$328,174 to \$361,887 (+\$33,713). At that time, a limited scope rulemaking for Regulation #73 was still considered to be needed. After that meeting, the limited scope rulemaking for Regulation #73 has been postponed indefinitely (informally) and the Lakes Nutrients rulemaking hearing has been delayed to April 2023. Therefore, part of the funding for the Regulation #73 hearing has been moved for use in the Lakes Nutrients hearing effort and the Lake Nutrients rulemaking budget not used or needed in 2022 has been moved to 2023. This adjustment is reflected in the estimated 2022 budget as of 9/30/2022 and the proposed budget for 2023.

Financial Services. The proposed 2023 financial services budget remains the same as was budgeted for 2022.

Inflation. Previous planning workbooks have assumed a 3% increase in all expenses due to inflation. Given the large increase in inflation in 2021 and 2022, the 2023 budget assumes a 6% increase in all expenses for 2023 except as follows:

- NPS Projects and Consultants: Approximate 6% increase, rounded for budgeting
- Authority Management Fees: 10% increase
- Financial Services: No increase

NPS Projects and Consultants. The proposed 2023 budget maintains the previously planned 2023 NPS projects and work while shifting watershed work planned for 2022 to 2023.

Lobbyist. The need for a lobbyist to shepherd a long-term funding initiative for the CWA has been discussed with the TAC and the Board. I am currently budgeting an estimated \$35,000 expense for a lobbyist in 2023 as a placeholder for this work.

2023-2028 Planning Budget: The 2023-2028 Planning Budget Workbook includes a separate tab which presents estimates of additional expenditures for future water quality rulemaking processes and NPS projects should the Board choose to participate in those processes and projects. The spreadsheet includes four separate line items as follows:

- Lakes/Nutrients Rulemaking. There is proposed additional rulemaking in 2027 to complete the lakes/nutrients standards for all Colorado reservoirs and streams. It is unknown if the standards adopted in the 2023 rulemaking hearing will be further modified and what will be proposed as final nutrient standards for streams. If the CWA chooses to not participate in this rulemaking process, the CWA will not have a direct voice in determining if the proposed standards are appropriate and/ or whether they are needed to protect beneficial uses in the watershed.
- Regulation #73 Rulemaking. It is likely that a rulemaking hearing will be proposed for Regulation #73 to adopt revised TMAL allocations for Chatfield Reservoir along with other updates / revisions to the Regulation. It is anticipated that this rulemaking hearing will also determine wasteload allocations for MS4 entities as they are now considered to be point sources. If the CWA chooses to not participate in this rulemaking process, the CWA will not have a direct voice in determining the proposed TMAL allocations nor other possible revisions that, if adopted, may not be in the best interests of the CWA members. It should

be noted that Regulation #73 includes the following: “The activities to support revisions to allocations of the allowable load are identified below. The Authority shall implement these activities, as allowed by applicable funding levels (underline added), for review by the Division and Commission at the next triennial review”. The CWA may be able to delay the implementation of activities to revise the TMAL but it is uncertain for how long the Water Quality Control Commission will wait for this effort. It has been 13 years since this requirement was included in Regulation #73.

- Increase Projects Budget. There have been previous discussions of the possibility of the CWA substantially participating in a larger NPS project as well as suggestions by the Water Quality Control Division of the CWA doing more NPS work. The current 2023-2028 budget includes \$29,000/year for NPS projects. If the CWA decides to maintain the \$29,000 annual NPS projects budget, these additional projects would not be funded.
- Cost to Secure Additional Funding. Only the draft 2023 budget includes funding of a lobbyist to help secure additional revenue for the CWA. There may be additional costs associated with this effort that cannot be estimated at this time.

If none of the estimated additional expenditures are ultimately needed or implemented, there is still a small amount of revenue increase needed to maintain the recommended \$100,000 fund balance. This represents about \$13,000 annually from 2024-2028.

TAC RECOMMENDATION(S): No recommendation.

PROPOSED MOTION to BOARD: No motion. For Information Only

Attachment: CWA Budget Planning Workbook 2023-2028 Version 10/17/2022

cc:

Chatfield Watershed Authority 2022 Budget Planning Workbook Revision (For Information Only)

10/17/2022

All Financial Numbers Rounded to the Nearest Dollar

Line Item #		2018 Budget	2019 Budget	2020 Adjusted Budget	2020 Actual	2021 Adjusted Budget	2021 Actual	2022 Original Planning Budget	2022 Adopted Budget	2022 Current Budget (as amended)	2022 Current Budget (estimated as of 9/30/2022)	2023 Planning Budget	2023 Proposed Revised Budget	2024 Planning Budget	2025 Planning Budget	2026 Planning Budget	2027 Planning Budget	2028 Planning Budget	Line Item Comments for 2023 Proposed Budget
	Income																		
4001 - 4019	Member Dues	\$170,005	\$172,005	\$170,005	\$170,005	\$172,005	\$172,005	\$172,005	\$208,806	\$208,806	\$208,806	\$206,406	\$206,406	\$206,406	\$206,406	\$206,406	\$206,406	\$206,406	
4038 - 4045	Monitoring In-Kind	\$74,546	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	Monitoring: In-Kind Income is matched with In-Kind Expenditures (Line Item 5111)
4103	Interest Income	\$0	\$20	\$0	\$67	\$0	\$39	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
	Other- Voluntary Dues /Other Income	\$2254	\$0	\$2,500	\$13,460	\$0	\$12,005	\$2,000	\$0	\$0	\$0	\$2,400	\$2,400	\$2,400	\$2,400	\$2,400	\$2,400	\$2,400	
	Total Income	\$246,805	\$244,171	\$244,651	\$255,678	\$244,151	\$256,195	\$246,151	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	\$280,952	
	Expenditures																		
5001	Management Fees - Technical	\$94,518	\$0	\$73,000	\$68,524	\$70,000	\$64,982	\$72,100	\$77,100	\$87,100	\$82,100	\$76,426	\$81,426	\$78,719	\$81,080	\$83,513	\$86,018	\$88,599	Moved \$5000 for Lakes Nutrients Rulemaking from 2022 to 2023.
5002	Management Fees - Authority	\$0	\$30,000	\$36,600	\$28,470	\$35,000	\$35,000	\$36,050	\$36,050	\$36,050	\$36,050	\$39,655	\$39,655	\$40,845	\$42,070	\$43,332	\$44,632	\$45,971	
5003	Website Hosting	\$3,000	\$3,475	\$3,600	\$3,750	\$7,100	\$4,450	\$3,708	\$3,708	\$3,708	\$3,708	\$3,930	\$3,930	\$4,048	\$4,170	\$4,295	\$4,424	\$4,557	
5004	NPS Projects and Consultants	\$2505	\$0	\$45,500	\$31,588	\$34,400	\$6,740	\$69,000	\$64,000	\$62,713	\$38,713	\$74,000	\$92,000	\$134,000	\$29,000	\$29,000	\$29,000	\$29,000	Added \$18,000 to catch up on watershed/reservoir linkage
5005	Legal - Admin	\$0	\$12000	\$20,000	\$17,475	\$56,100	\$57,358	\$20,600	\$59,240	\$84,240	\$59,240	\$33,644	\$58,640	\$34,654	\$35,693	\$36,764	\$37,867	\$39,003	Moved \$25000 for Lakes Nutrients Rulemaking from 2022 to 2023
5006	Misc. Admin.	\$385	\$35	\$500	\$0	\$500	\$106	\$515	\$515	\$515	\$515	\$546	\$546	\$562	\$579	\$597	\$614	\$633	
5007	Prof'l. Fees – Financial	\$12,000	\$12,000	\$12,000	\$12,000	\$12,000	\$9,750	\$12,360	\$9,750	\$9,750	\$9,750	\$9,750	\$9,750	\$10,043	\$10,344	\$10,654	\$10,974	\$11,303	
5103	Monitoring	\$0	\$17000	\$5,000	\$0	\$0	\$0	\$5,150	\$5,150	\$5,150	\$5,150	\$5,459	\$5,459	\$5,623	\$5,791	\$5,965	\$6,144	\$6,328	
5109	Public Outreach	\$3,800	\$1550	\$1,550	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0					
5110	Insurance	--	\$4000	--	--	--	--	--	--	--	--	--	--	--					
5015	Technical and Other Consultants	--	\$87700	--	--	--	--	--	--	--	--	--	--	--					
5115	Pub Outreach - Consultants	--	\$3,800	\$2,200	\$565	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$35,000	\$0	\$0	\$0	\$0	\$0	Added \$35,000/yr. for potential lobbyist for securing long term funding .
5117	Pub Outreach - Sponsorships	--	\$500	\$500	\$235	\$500	\$450	\$515	\$515	\$515	\$515	\$546	\$546	\$562	\$579	\$597	\$614	\$633	
5111	Monitoring In- Kind	\$74,586	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	\$72,146	Monitoring: In-Kind Expenditures matched to In- Kind Income (Lines 4038-4045)
	Total Expenditures	\$190,794	\$244,206	\$272,596	\$234,753	\$287,746	\$250,982	\$292,144	\$328,174	\$361,887	\$307,887	\$316,103	\$399,098	\$381,201	\$281,453	\$286,862	\$292,434	\$298,172	
	Net Change in Fund Balance	\$56,011	-\$35	-\$27,945	\$20,925	-\$43,595	\$5,213	-\$45,993	-\$47,222	-\$80,935	-\$26,935	-\$35,151	-\$118,146	-\$100,249	-\$501	-\$5,910	-\$11,482	-\$17,220	
	Ending Fund Balance (Budget)	\$290,814	\$290,849	\$262,904		\$268,179		\$270,994	\$269,765	\$236,052	\$290,052	\$254,901	\$171,906	\$71,656	\$71,155	\$65,245	\$53,763	\$36,543	Policy is to maintain minimum ending fund balance of \$100,000.
	Ending Fund Balance (Actual/Estimated)	\$290,814	\$290,849		\$311,774		\$316,987								This Planning Budget does not include potential expenditures in 2025-2028 for a full Regulation #73 rulemaking hearing and TMAL revision, nor other potential unknown expenses and desired expenditures (i.e. 2027 Lakes nutrients rulemaking & added NPS projects).				

WATERSHED SERVICES AND PROJECTS : 2021 - 2024						
10/17/2022 Draft						
TMAL DEVELOPMENT						
Description	Cost Estimate	In-kind	Agency	Consultant Support	Year	Outcome
Triennial Review Informational Hearing	Included in Technical Services		CWA	Tech. Consultant	2021 & 2022	Provide status update to the WQCC
Reassign Load Allocations, assuming WLA remain static	\$40,000		CWA	Lynker/ Tech. Consultant	2024	When required by the WQCC
Total 2021-2024	\$40,000					
WATERSHED MODEL						
Model Update	\$0	\$10,000 DWB	CWA	Lynker	2021	Update model to include the last 5 years of water quality data.
Model Refinement	\$16,000		CWA	Lynker	2023	Review and analyze results. Refine model calibration if warranted from scenario results and/or use of updated information.
Scenario Runs	\$24,720		CWA	Lynker	2021	Use of model for running management scenarios to target problem areas, quantify benefits of NPS projects in the watershed, and evaluate options for reducing nutrient loads to Chatfield Reservoir.
Scenario Runs	\$33,000		CWA	Lynker	2024	Use of model for running management scenarios to target problem areas, quantify benefits of NPS projects in the watershed, and evaluate options for reducing nutrient loads to Chatfield Reservoir.
Watershed / reservoir model linkage	\$5,000		CWA	Lynker/Hydros	2023	Explore methodology to link the watershed model to the reservoir model - Coordination with CRMC
Watershed / reservoir model linkage	\$37,000		CWA	Lynker/Hydros	2023	Establish methodology to link the watershed model to the reservoir model - Coordination with CRMC
Watershed / reservoir model linkage	\$37,000		CWA	Lynker/Hydros	2024	Link the watershed model to the reservoir model - Coordination with CRMC
Total 2021-2024	\$152,720					
NPS PROJECT FUNDING						
Description	Cost to CWA	In-kind Costs	Primary Funding Agency(s)	CWA Partnership Opportunities	Year	
Wildfire Mitigation	\$29,000/Year	??	??	Mitigation Projects / Grant Funding	2022-2024	Includes \$5000 Hilldale Pines Wildfire Mitigation Grant Pledge (Assume now in 2023)
Agricultural Mitigation				NRCS Grants / CALF	2022-2024	
Septic Systems Mitigation				Tri-County Health	2022-2024	
Erosion Mitigation				Stream Sampling Plan, Grant Funding	2022-2024	Includes \$5000 for WPCSM (2022)
2021-2024	\$116,000	\$29,000/yr for 4 years				
Total Year 2021	\$48,720					
Total Year 2022	\$34,000					
Total Year 2023	\$92,000					
Total Year 2024	\$134,000					
Grand Total	\$308,720					

DRAFT

Chatfield Watershed Authority 2022-2028 Budget Planning Workbook (For Information Only)

10/17/2022

Current Planned Budget	2022	2023	2024	2025	2026	2027	2028	Total	Comments
Beginning Balance	\$ 316,987	\$ 290,052	\$ 171,906	\$ 71,656	\$ 71,155	\$ 65,245	\$ 53,763		
Net Revenues	\$ 280,952	\$ 280,952	\$ 280,952	\$ 280,952	\$ 280,952	\$ 280,952	\$ 280,952	\$ 1,966,664	
Net Expenses	\$ 307,887	\$ 399,098	\$ 381,201	\$ 281,453	\$ 286,862	\$ 292,434	\$ 298,172	\$ 2,247,108	
Net Change	\$ (26,935)	\$ (118,146)	\$ (100,249)	\$ (501)	\$ (5,910)	\$ (11,482)	\$ (17,220)	\$ (280,444)	
Projected Ending Balance	\$ 290,052	\$ 171,906	\$ 71,656	\$ 71,155	\$ 65,245	\$ 53,763	\$ 36,543		
Possible Future Expenses									
Lakes/Nutrients Rulemaking					\$ 50,000	\$ 50,000		\$ 100,000	Rely on Others Analysis
Regulation #73 Rulemaking (after 2022)									
General Rulemaking				\$ 40,000	\$ 20,000			\$ 60,000	Legal/Technical
TMAL Revision			\$ 75,000	\$ 100,000	\$ 100,000			\$ 275,000	Modeling/Stakeholders
Increase Projects Budget				\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000	\$ 120,000	Build One Project
Cost to Secure Additional Funding								\$ -	Unknown
Total Additional Potential Expenses	\$ -	\$ -	\$ 75,000	\$ 170,000	\$ 200,000	\$ 80,000	\$ 30,000	\$ 555,000	
Projected Ending Balance	\$ 290,052	\$ 171,906	\$ (3,344)	\$ (173,845)	\$ (379,755)	\$ (471,237)	\$ (518,457)		
Potential Dues Increase (or other funding to maintain 2028 ending fund balance of \$100,000).			\$ 123,691	\$ 123,691	\$ 123,691	\$ 123,691	\$ 123,691	\$ 618,457	60%
Projected Net in CWA Account	\$ 290,052	\$ 171,906	\$ 120,348	\$ 73,538	\$ (8,681)	\$ 23,529	\$ 100,000	\$ 816,788	

Attachment 18



August 12, 2022

CDPS Number: COX631080
Sun Jelly Larkspur CO RV LLC
John McLaren, Pres COO
27777 Franklin Rd
Southfield, MI 48034

**RE: COMPLIANCE ADVISORY - REPORTED EFFLUENT VIOLATION
NOTICE OF SIGNIFICANT NON-COMPLIANCE
JELLYSTONE PARK AT LARKSPUR WWTF, COX631080**

To Whom It May Concern:

Colorado Discharge Permit System, Permit No. COX631080 (Permit) authorizes Sun Jelly Larkspur CO RV LLC to discharge treated wastewater subject to the specific effluent limitations of the permit. This compliance advisory is intended to advise you of alleged violations of the Colorado Water Quality Control Act.

The self-monitoring data provided on the Discharge Monitoring Reports for the above-referenced facility indicates significant noncompliance with the permit effluent limitations, as indicated in the attached Effluent Violation Report.

Due to the severity and/or persistence of these violations, the Water Quality Control Division (division) is initiating a process to determine whether a formal enforcement action is warranted. Please submit a response to this letter explaining:

- The cause of the non-compliance;
- The actions and measures you have taken or will be taking to abate the non-compliance; and,
- Any other relevant information.

Electronic correspondence is preferred. Please email your response to: mandy.mercer@state.co.us. Please address all paper correspondence (if applicable) to the following address:

Colorado Department of Public Health and Environment
Water Quality Control Division
WQCD-B2-CWE
ATTN: Mandy Mercer
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

The division will evaluate the facts associated with Sun Jelly Larkspur CO RV LLC's non-compliance, and if a formal enforcement action is deemed necessary, you may be issued a Notice of Violation / Cease and Desist Order that may include the assessment of penalties. Pursuant to §25-8-608, C.R.S., any person who violates any provision of the Colorado Water Quality Control Act, or of any permit issued under the Act, or any control regulation promulgated pursuant to the Act, shall be subject to a civil penalty of up to \$56,759 per violation for each day during which such violation occurs.

(over)



John McLaren, Pres COO
Sun Jelly Larkspur CO RV LLC, COX631080
August 12, 2022

If you have any questions regarding this matter, please contact me at (303) 692-2283 or via email at mandy.mercer@state.co.us.

Sincerely,

A handwritten signature in cursive script that reads "Mandy Mercer".

Mandy Mercer
Enforcement Specialist
Clean Water Enforcement Unit
Water Quality Control Division

Enclosure: Effluent Violation Summary

cc: File Copy

Report #: CAEVRBX004

Created Date: March 2, 2012

Approved By:

Colorado Department of Public Health and Environment

Water Quality Control Division

Effluent Violation Report

Date of Report: 8/5/22

*** Query Name:Effluent Data ***

Major/Minor (Enter "Major" or "Minor") (Enter * to select all) *
Monitoring Period End Date From: 01/31/2022
Monitoring Period End Date To: 06/30/2022
Enter NPDES ID: (Optional)
Matching NPDES ID: (Optional)COX631080
Primary Permit SIC Code: (Optional)
Outfalls: (Optional)
Parameter Desc: (Optional)
Enter Primary Permit SIC Code Not Equal to: (Optional)

Table with permit details: Permit # COX631080, Facility Name JELLYSTONE PARK AT LARKSPUR WWTF, Permit Name Sun Jelly Larkspur CO RV LLC, Permit Status Effective, Major/Minor Ind. Minor, County Douglas, Primary SIC Code 4952, Water Body: groundwater

Main data table with columns: NPDES ID, Outfall, Mon Pd Start Date, Mon Pd End Date, Parameter, Rpted Value, Unit Desc, Limit Value, Stat Base Desc, % Exceed, Viol Code, NODI Code, RNC Detect Code, RNC Resolve Code. Contains 8 rows of violation data.

Attachment 19



October 11, 2022

Colorado Department of Public Health and Environment
Water Quality Control Division
WQCD-B2-CWE
ATTN: Mandy Mercer
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

RE: Jellystone Park at Larkspur WWTF COX631080

Dear Ms. Mercer:

On behalf of the Chatfield Watershed Authority (CWA) as its Technical Consultant, we would like to provide you CWA's input regarding the Division's finding of significant noncompliance with the permit effluent limitations as documented in the Division's letter to Sun Jelly Larkspur CO RV LLC dated August 12, 2022, and other documented violations of the effluent limits.

Water Quality Control Regulation #73 requires wastewater treatment facilities in the Chatfield Watershed to meet certain effluent discharge and wasteload allocations. For the subject facility, the requirements limit the subject facility's discharge of total phosphorus to 1.0 mg/l with a wasteload allocation of 72.6 lbs/year. The reported total phosphorus discharged from the subject facility in 2021 was 105.2 lbs. This amount exceeded the allowable annual wasteload allocation assigned to the subject facility of 72.6 lbs.

The CWA and ultimately, the Division, approved a phosphorus trade for the subject facility. The CWA's approval of said trade was conditioned on Sun Jelly meeting certain pre-construction and post-construction conditions (labelled as Conditions 1-6 in CWA's approval letter dated November 14, 2019 (attached)). Sun Jelly has met Conditions 1-5. Condition 6 stated that "The applicant shall monitor the phosphorus concentration of the WWTF influent and provide a yearly report to the CWA (by January 31 of each year) providing the monitoring results and calculating the average WWTF influent phosphorus concentration for that year and the total phosphorus influent load based upon the flow rates used for the original credit calculation. This information may be used to revise the phosphorus credits based upon the provisions of "Section VIII(C) Adjustments and Revocations" of the Guidelines".

720 SOUTH COLORADO BLVD.
SUITE 410 S
DENVER, CO 80246
303.757.3655



In addition, the “Certification to Discharge Under CDPS General Permit COX631000 Domestic Wastewater Treatment Systems Discharging To Groundwater With Land Disposal of Effluent” includes “002-A Effluent Monitoring Requirements per Part I.B.2 of the Permit and the Fact Sheet”. The maximum discharge load of Total Phosphorus as P is limited to 72.6 lbs/year. Footnote 2 to this limit states the following: “Per the fact sheet final approval of the annual waste load allocation is dependent on documentation that the conditions outlined in CWA’s 11/14/19 letter are met. Should the facility fail to meet the CWA conditions, the Division may modify or terminate the permit certification as appropriate”.

As of the date of this letter, Sun Jelly has not provided the annual report required pursuant to CWA Condition 6 and the subject “Certification”. The CWA provided a courtesy email to Sun Jelly on April 29, 2022, requesting the annual report and written explanation as to the cause of the total phosphorus exceedances and what efforts were being performed to bring the facility back into compliance (attached). RESPEC received a telephone response to the email stating that a written response would be provided. However, as of this date, no such written response has been provided to the CWA.

In addition to the effluent violation for exceeding the total phosphorus concentration limit of 1 mg/l reported in the Division’s August 12, 2022, letter, the facility also exceeded the total phosphorus concentration limit of 1.0 mg/l in September, October, November, and December 2021, and possibly on other dates.

The violations of the total annual phosphorus wasteload allocation and the total phosphorus effluent concentration limits are of significant concern to the CWA, especially if these violations continue to occur without certainty that the problems with the facility causing these violations are being corrected in an expedited time frame. Loads and concentrations higher than the approved limits could potentially affect the total phosphorus concentration and chlorophyll a level in Chatfield Reservoir which the CWA is trying to protect. The violation of Condition 6 of the certification and CWA’s requirements is also of significant concern to the CWA. This condition was implemented to provide verification that the estimated total phosphorus loads to the decommissioned septic systems used for the phosphorus trade is consistent with the total phosphorus loads measured at the plant influent. If inconsistencies are found, the annual wasteload allocation may need to be adjusted.

The CWA is not requesting any specific action be taken by the Division at this time. However, the CWA would like to be kept informed as to the solution and progress towards solving the current effluent issues and the Division’s proposed regulatory actions based on these violations. At the appropriate time, the CWA would like to discuss and cooperate with the Division and Sun Jelly on possible actions that Sun Jelly could take to mitigate the effects to the Chatfield watershed due to the documented effluent violations. We also encourage Sun Jelly to come to the table to propose and find solutions to protect the watershed. We believe that with Sun Jelly cooperation with the CWA, the CWA can bring



Sun Jelly value if they step up and support the CWA's water quality goals through projects or other means, including help with funding of the CWA's projects and programs.

Let me know if you have any questions or require further clarifications.

Sincerely,

RESPEC, Company, LLC

A handwritten signature in black ink, appearing to read 'Alan J. Leak'.

Alan J. Leak, P.E.

Chatfield Watershed Authority Technical Consultant

cc: Diane Kielty, CWA Manager

Weston Martin, CWA TAC Chair

Ryan Adrian, CWA TAC Vice-Chair

John McLaren, Pres COO, Sun Jelly Larkspur CO RV LLC

Attachment

From: [Alan Leak](#)
To: ewood@suncommunities.com
Cc: willsemocor@hotmail.com; [Colorado Watershed Assembly](#); [Sarah Klahn](#); [Michael Daugherty](#)
Subject: Jellystone Park at Larkspur WWTF Annual Report for the Chatfield Watershed Authority
Date: Friday, April 29, 2022 8:23:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Mr. Wood:

I am contacting you as the technical consultant to the Chatfield Watershed Authority (CWA) regarding the Jellystone Park at Larkspur WWTF. On November 5, 2019, the CWA approved a phosphorus trade for the subject facility with six conditions of approval. Condition #6 stated "The applicant shall monitor the phosphorus concentration of the WWTF influent and provide a yearly report to the Authority (by January 31 of each year) providing the monitoring results and calculating the average WWTF influent phosphorus concentration for that year and the total phosphorus influent load based upon the flow rates used for the original credit calculation. This information may be used to revise the phosphorus credits based upon the provisions of "Section VIII(C) Adjustments and Revocations" of the Guidelines." As of today, I nor the CWA has received the required annual report.

In addition, the information provided by your facility contact (SEMOCOR Inc.) and as represented by the online data maintained by the Colorado Division of Public Health and Environment (CDPHE) shows that, in 2021, the subject facility exceeded the total phosphorus wasteload allocation of 72.6 pounds/year by 56.6 pounds and exceeded the 1 mg/l total phosphorus discharge concentration limit from September through December. Therefore, in addition to the annual report, please provide a written explanation as to the cause of the total phosphorus exceedances and what efforts are being performed to bring the facility back into compliance. Once received, the annual report and your written response letter will be provided to the CWA for review and possible further action.

If you have any questions, please give me a call. Thanks. Alan



Alan J. Leak

Principal

RESPEC

720 S. Colorado Blvd., Suite 410S
Denver, Colorado 80246
o. 720-775-6406 // c. 303-909-8670



Attachment 20



September 7, 2022

Colorado Department of Public Health & Safety
Water Quality Control/Engineering Section
Attn: Emily Wong
4300 Cherry Creek Drive South, B2
Denver, CO 80246-1530

RE: Pine Canyon Amended Site Location Application – Comments of the Town of Castle Rock

Dear Ms. Wong

Thank you for your August 18, 2022, letter regarding the Pine Canyon Site Application. Castle Rock continues to have significant concerns regarding the potential Pine Canyon wastewater treatment facility. We appreciate the opportunity to provide additional input and share our concerns. Our input and concerns are organized according to the items in your letter, which are repeated in italics for clarity.

1. The comment letter states that the Preliminary Effluent Limits (PELs) have not been updated to include conditions to meet the Land Application Management Plan (LAMP). Please see attached for the most recent version of the PELs dated June 6, 2022, which include the conditions to meet the LAMP. No response is required unless the Town has a separate comment related to this LAMP.

Castle Rock has reviewed the revised Preliminary Effluent Limits (PELs) dated June 6, 2022, updated to include conditions relative to the Land Application Management Plan (LAMP). The conditions added by the Colorado Department of Public Health and Environment (CDPHE) Water Quality Control Division (WQCD) do not address the primary concern associated with this facility. The facility is supposed to be a zero discharge facility and yet, it would be relying heavily on irrigation of turf grass by residential single-family home owners and commercial development to handle wastewater disposal. Because the applicant relies on the end users to ensure that there is no discharge of phosphorus to waters of the state, the application fails to demonstrate that the proposed domestic wastewater treatment works would be managed to minimize the potential adverse impact on water quality. Therefore, the site location application is inconsistent with the requirements of C.R.S. § 25-8-702(2)(b) and Regulation 22, Section 22.5. Even if compliance with the LAMP and PELs were sufficient to minimize the potential adverse impact on water quality, the applicant's consolidation analysis fails to account for all of the costs required to comply with the LAMP. Therefore, the application fails to demonstrate that the proposed domestic wastewater treatment works can meet the applicable water quality planning targets as required by Reg. 22, Section 22.5(1)(h), or that the proposal is consistent with the policy of encouraging the consolidation of wastewater treatment facilities whenever feasible. C.R.S. § 25-8-702(2)(c); Reg. 22, Section 22.3(1)(c).

It is Castle Rock's extensive experience that single family home owners and commercial development often over apply water to turf landscapes. Water waste is a guarantee, with that water running onto sidewalks, in gutters, soaking into the groundwater, and generally not being strictly applied to the turf grass. Residential customers and commercial customers often also irrigate during precipitation events, even when rain sensors have been installed on the irrigation systems. This is because residential homeowners and commercial customers often do not understand how to work or control their irrigation systems. This water waste with phosphorus and nitrogen will run to the stormwater system and from there to East Plum Creek. This water will

also percolate into the ground not being used by the plants, carrying nitrogen and phosphorus to groundwater. The WQCD has not added any conditions to the PELs and the LAMP which will monitor discharge by single family homes or commercial business owners to stormwater and groundwater. Violations of a potential permit would be common. Without any conditions to monitor for these violations, the WQCD would not be able to enforce a zero discharge permit. The WQCD acknowledges this very issue on page 9 of the PELs, see below:

“Suggested spray head for the lawn and tree and shrubs is HE-VAN, manufactured by Rain Bird. A communication with the manufacturer of the product resulted in a “no water application efficiency” outcome for the product. Therefore, a water application efficiency for HE-VAN type sprinkler head in the LAMP was 80%. This means that the 20% more water than the water needed by the plant would be applied to the LAMP area. This water amount would either be going to deep percolation or running off the site or both. This can be a concern about the whole system even though the contractor says that all the runoff will be collected in treatment ponds for removal of phosphorus before it is released. If released to the creek then some other permitting may apply. The facility will have to work with the Permits Section to address it. A special attention will have to be paid to the potential runoff water from the irrigated sites to lead the water to the treatment ponds.”

While the WQCD indicates that the “contractor” says all runoff will be collected in treatment ponds for removal of phosphorus before it is released, it is not clear how they will collect this water from 1,300-plus single-family homes that have over-sprayed irrigation to gutters and sidewalks and or over irrigated, causing water to percolate to groundwater. In fact, there will be no way for the “contractor” to collect the groundwater impacted by over irrigation for treatment in ponds. Further, if the “contractor” is going to treat the water in ponds, then they will by definition have a discharge. Unless they can remove phosphorus to zero, they will need a phosphorus waste load allocation. Castle Rock cannot accept a LAMP that is unenforceable to permit. The WQCD must show how they will enforce a zero discharge facility located in the heart of Castle Rock. The current PELs do not address this issue.

2. The comment letter (page 7) appears to indicate that if Pine Canyon annexed to the Town, reclaimed water would be available to Pine Canyon for reuse. Please clarify whether 100 percent of the water sent to Plum Creek Water Reclamation Authority (PCWRA) wastewater treatment facility from Pine Canyon would be available for Reuse within the Pine Canyon development.

First, it is important to understand that if Pine Canyon annexed to the Town, they would become part of Castle Rock Water’s full water and wastewater system. The development would have access to renewable water and reusable water not only from Pine Canyon, but from the whole Town, and not be reliant solely on nonrenewable groundwater.

As explained in Castle Rock’s initial comments on the Pine Canyon site location application (August 28, 2020), Pine Canyon proposes to develop on a non-renewable and unsustainable groundwater supply. The nontributary Denver Basin aquifers that Pine Canyon proposes to use as the sole water supply for the proposed development are not recharged by precipitation or streams. See C.R.S. § 37-92-103(10.5). Water in these aquifers is allocated based on a 100-year aquifer life, which means that the pumping of wells would deplete the aquifer over time. *Id.* § 137(4)(a). The State Engineer is currently putting a total withdrawal volume limit on all new Denver Basin groundwater (nonrenewable water) wells. This means some day in the future, Pine Canyon will run out of water if they are allowed to develop solely on nonrenewable groundwater. Castle Rock has invested over \$234 million dollars to date, with another \$500M-plus planned, to transition off of non-renewable groundwater to renewable water supplies to ensure a sustainable, long-term supply for our residents. Therefore, while development as proposed by Pine Canyon would rely on non-renewable water, annexation to the Town would provide water that is both renewable and reusable. For this reason, as noted in the Town’s comments on the Pine Canyon amended site location application (June 15, 2022), Pine Canyon’s

consolidation analysis was flawed by a lack of reasonable estimates of the cost of providing a renewable water supply.

Castle Rock Water has an indirect reuse system in place for its entire service area. Water used in the Town is treated to environmental standards at the Plum Creek Water Reclamation Authority (PCWRA) wastewater treatment plant. The water is discharged to East Plum Creek and flows downstream to Sedalia, where Castle Rock Water has a diversion, reservoir and pump station. The water is pulled back off of Plum Creek and pumped via a pipeline back to Castle Rock Water's Plum Creek Water Purification Facility (PCWPF), where it is purified and reused by the Town for all municipal purposes. If Pine Canyon annexed into the Town, any water used in the Pine Canyon development would be treated at the PCWRA wastewater treatment plant, recaptured in Sedalia, purified at the PCWPF, and reused throughout the Town. This means that 100 percent of the water sent to PCWRA (minus losses for evaporation, consumption, etc.) would be reused throughout the Town, including in Pine Canyon. This reuse would occur without the need to construct and maintain a separate reclaimed water distribution system. Pine Canyon would be served by reuse water from the entire service area, not just from Pine Canyon.

3. Castle Rock appears to support the idea of wastewater consolidation for the benefit of public health and the environment. In addition, the Division understands that the Pine Canyon development was included in the PCWRA master planning. In the interest of wastewater conveyance and treatment consolidation, please explain the options that Castle Rock and the other members have discussed, offered, or would support for purchase and availability of interceptor and/or treatment capacity to allow Pine Canyon to be served by the Plum Creek Water Reclamation Authority (PCWRA). In addition to all options considered, please specifically discuss how Castle Rock and other members could and would support the following options:

- a. Inviting Pine Canyon to become a member of the PCWRA.*
- b. Providing extra-territorial service to Pine Canyon without annexation into the Town of Castle Rock, and*
- c. Providing service to Pine Canyon with annexation into the Town of Castle Rock that may exclude specific requirements, like the transfer of water rights.*
- d. Providing Pine Canyon with special connector status to PCWRA.*

Castle Rock definitely supports the concept of wastewater (and water) consolidation for the benefit of public health and the environment. Consolidation also benefits the bottom line of customers. Douglas County already has a number of tiny water and sanitation districts that are failing and cannot provide adequate service. These districts are having to be bailed out by the County (at the expense of the general taxpayer) and Castle Rock Water, because they do not have the resources to provide sustainable service in this complex utility business.

Castle Rock has worked with Pine Canyon and is still willing to work with Pine Canyon on annexation to the Town. We know that annexation and development within the Town is profitable and cost effective, as we are one of the fastest-growing municipalities in the Country, with developers continuing to propose new projects and annexations to the Town every day. Annexation will be the most cost-effective approach for Pine Canyon to obtain water and wastewater service for the planned development and will be the most beneficial approach for the residents and businesses that will ultimately be in Pine Canyon.

- a. Inviting Pine Canyon to become a member of the PCWRA.*

Castle Rock will not support Pine Canyon becoming a full member of PCWRA. PCWRA was established through an Establishing Agreement in 1989. All of the members would have to approve a new full member. Castle Rock will not approve a 1,300-unit development to become a full member with equal voting rights alongside a Town of 80,000 people. Further, all of the treatment capacity is owned by the existing members. As such, Pine Canyon can only access treatment capacity through one of the existing members.

b. Providing extra-territorial service to Pine Canyon without annexation into the Town of Castle Rock, and

The Town of Castle would oppose the extension of extra-territorial service to unincorporated Pine Canyon. Castle Rock has and will continue to consider and offer extra-territorial service in situations where existing water/wastewater systems need the assistance of Castle Rock, such as the recent Bell Mountain Ranch extension of service. Bell Mountain is an example of a decades-old system, built out residential subdivision, that could not meet environmental standards. Castle Rock will now provide service, with appropriate surcharge costs, to this existing Bell Mountain subdivision. Pine Canyon doesn't currently exist and should not be planned for failure. Extension of Town services for new subdivision growth without annexation is poor public policy. If Pine Canyon desires Castle Rock water and wastewater service, it should annex into the Town of Castle Rock and comply with Castle Rock standards – as hundreds of new residences in Castle Rock successfully do every year.

c. Providing service to Pine Canyon with annexation into the Town of Castle Rock that may exclude specific requirements, like the transfer of water rights.

If Pine Canyon annexes into the Town, they would be required to meet all of the Town's requirements, just like every other development that has proceeded within the Town. We cannot provide a special exclusion just for Pine Canyon. This means Pine Canyon's groundwater rights would need to be dedicated to the Town. However, in return for the dedication of the non-renewable Denver Basin groundwater rights held by the applicant, as explained above, the development would receive a renewable, reusable supply from the Town, and access to the infrastructure needed to accomplish reuse without the need to construct a new reclaimed water distribution system.

Therefore, the requirement to dedicate water to Castle Rock does not impair the applicant's water rights as contemplated by Water Quality Control Division Policy CW-14. Further, consolidation and annexation would not preclude water reuse opportunities, nor impair water conservation efforts, as also contemplated by Policy CW-14. To the contrary, because the Town would provide a renewable water supply, annexation would conserve the non-renewable Denver Basin nontributary groundwater aquifer.

d. Providing Pine Canyon with special connector status to PCWRA.

Castle Rock would not support Pine Canyon becoming a special connector for several reasons. First, this would allow Pine Canyon to continue with a small water and sanitation district that will likely have issues in the future due to inadequate funding and management capacity. Second, since Pine Canyon does not have any way to own treatment capacity in PCWRA without purchasing it from one of the members, Castle Rock would have to sell treatment capacity to Pine Canyon. The other members likely do not have excess capacity to sell. Selling treatment capacity to a small, newly formed water and sanitation district located in the middle of Castle Rock is not in the best interest of the Town, nor the future residents of Pine Canyon. Those residents should be served by Castle Rock Water, either through annexation or an extraterritorial service agreement.

Beyond our response to the WQCD's questions, Castle Rock would like to raise some additional concerns. The concept of a LAMP to dispose of wastewater utilizing residential turf grass is contrary to the current policy concerns facing the State of Colorado. The Colorado River is in crisis. Responsible water providers are moving away from residential turf grass as a luxury we cannot afford in Colorado. Aurora has just passed an ordinance that no longer allows turf grass in the front yard of new houses and limits turf to 500 square feet in the backyard. Castle Rock is considering a similar ordinance. The largest water providers in Colorado have just signed a Memorandum of Understanding (MOU) to eliminate up to 30% of the existing turf grass in their service areas.

While using turf to dispose of wastewater seems like a good idea, it does not allow for that wastewater to become a water supply and be reused multiple times to extinction. If this development proceeds, Pine Canyon

will add hundreds of acres of turf grass requiring supplemental irrigation, which will directly conflict with the course being taken across the State to respond to the crisis at hand. While reuse water will initially be used to irrigate the turf, that water would only be able to be used once. In Castle Rock, we are moving away from turf grass irrigation and making sure that our reuse supplies are available to be reused many times until extinction.

Conclusion and Information Request

Castle Rock is continuing its review of the revised PELs, which incorporated the Land Application Management Plan as a condition. Based on this preliminary review, Castle Rock continues to recommend denial because a) the engineering report does not establish that the proposed domestic wastewater treatment works will meet all of the requirements of the water quality planning targets; b) even if the facility meets all the PELs, the engineering report does not establish that the proposal to dispose of all wastewater through end-user reclaimed water use will minimize the potential adverse effect on water quality; and c) the applicant's alternatives analysis is flawed, because it fails to account for the true costs of meeting the PELs, preventing adverse water quality effects, and providing the proposed community with a renewable and sustainable water supply.

Castle Rock has reviewed the Division's electronic file for the Pine Canyon site location application and, based on that review, it appears that the online electronic file is incomplete. In addition, Castle Rock has not received copies of correspondence concerning the application, even when listed in the cc line of letters (for example, Castle Rock did not receive a copy of the August 17, 2022, letter from Emily Wong to Jim Walker, even though Castle Rock Water was listed as a recipient). To ensure transparency of the application materials, and an adequate opportunity for Castle Rock to review and comment on any updated information provided by the applicant, Castle Rock requests that the Division a) provide copies to Castle Rock Water of all correspondence concerning the application and/or b) upload all applications, correspondence, and other written materials about the application to the Division's online file for the site application under number ES.20.SA.05399.

Sincerely,

Mark Marlowe,
Director of Castle Rock Water

Cc: Jason Gray, Mayor of Castle Rock
David Corliss, Town Manager of Castle Rock
Doug DeBord, County Manager of Douglas County
Terence Quinn, Director of Community Development of Douglas County
Curt Weitkunat, Planning Manager, Douglas County
Matt Jakubowski, Principal Planner, Douglas County
Diane Kielty, Authority Manager of Chatfield Watershed Authority
Weston Martin, Chair of the Technical Advisory Committee for Chatfield Watershed Authority
Bob Frachetti, AQUA Engineering
Brian Hlavacek, Tri-County Health Department
Alan Leak, Chatfield Watershed Authority
Sam Bishop, City of Castle Pines
Jim Worley, Castle Pines North Metropolitan District
Ernestine Trujillo, Aqua Engineering
Mike Emming, WQCD Engineering Section, Unit Manager

Bret Icenogle, WQCD Engineering Section, Section Manager
Joni Nuttle, Senior TMDL Specialist, Colorado Department of Public Health and Environment
Brandi Honeycutt, WQCD Permits Section
Mary Welch, WQCD Permits Section
Michelle DeLaria, WQCD Permits Section

Attachment 21



Dedicated to protecting and improving the health and environment of the people of Colorado

Cody Vavra
AQUA Engineering
5352 S Valentia Way
Greenwood Village, CO 80111
cody.vavra@aquang.com

MEMORANDUM

TO: Cody Vavra
FROM: Meg Parish, Permit Section Manager, Water Quality Control Division
DATE: 6/6/2022
RE: PEL200642 - Groundwater PELs for Pine Canyon Water Reclamation Facility
and
PEL200644 - Reuse PELs for Pine Canyon Water Reclamation Facility

**Permittee/
Facility:** Pine Canyon Water and Sanitation District - Pine Canyon Water Reclamation Facility

The Water Quality Control Division (division) of the Colorado Department of Public Health and Environment has prepared Preliminary Effluent Limits (PELs) for the proposed Pine Canyon Water and Sanitation District - Pine Canyon Water Reclamation Facility. This PEL is based on the following assumptions:

- the facility’s maximum month daily average hydraulic design capacity is 0.405 million gallons per day (MGD);
- the facility will reclaim 100% of its treated domestic wastewater under the division’s reclaimed water program and will have zero effluent discharge to groundwater;
- the facility is located in the Chatfield Reservoir Watershed where the requirements of Regulation 73 - Chatfield Reservoir Control Regulation apply;
- the facility will meet applicable Regulation 73 phosphorus limitations through the implementation of a land application management plan (LAMP) pursuant to Regulation 73.4(2)(c);
- the point of compliance with permit effluent limitations and Regulation 84 reclaimed water limitations is “end-of-pipe” (prior to the lined storage impoundments and distribution of reclaimed water). Note that in an email dated November 3, 2021 the PEL applicant stated that the point of compliance would be subsequent to treatment and “*inside the WWTP’s building before discharging to the storage ponds.*” Groundwater monitoring wells will not be approved as points of compliance.

PELs are used for planning purposes and are required as part of the Site Approval process. PELs are a projection of effluent limits that would be contained within a Colorado Discharge Permit System (CDPS) discharge permit based on the regulatory requirements in place at the time of this analysis and information disclosed by the applicant. As described in Attachment A, these PELs have been developed based on the current available information, including, but not limited to: information provided in the PEL application; current water quality regulations and/or standards; and current division policies and standard practices.

PELs do not constitute permission to discharge pollutants under the Water Quality Control Act (25-8-101, et. seq., C.R.S.). Final permit limits must be calculated after receipt of a discharge permit application and under the terms and conditions of Regulations 41, 61 and 62 (5 CCR 1002-41, 61, and 62). A determination of which effluent limits ultimately apply in a permit will depend on information available at the time of permit application and development, including but not limited to: current regulations and/or standards; permit application information; process knowledge; and monitoring data. The final effluent limits are expected to be similar, but will not necessarily be identical, to the projections in this PEL.





Dedicated to protecting and improving the health and environment of the people of Colorado

Table 1 summarizes the PELs that the proposed treatment facility will be evaluated against under the Site Approval process. This evaluation will include a determination of whether the proposed treatment facility, as designed, can meet these limitations. A new or modified wastewater treatment facility will be expected to meet the limitations for these parameters upon commencement of discharge or upon starting-up the modified treatment process. **Appendix A** describes the purpose and basis for these PELs.

Table 1 Preliminary Effluent Limitations - Pine Canyon Water Reclamation Facility			
Parameter		Limitations	
Regulation No. 62 - Technology-Based Limitations			
BOD ₅ (mg/l)		45 (7-day average), 30 (30-day average)	
BOD ₅ (% removal)		85 (30-day average)	
Oil and Grease (mg/l)		10 (maximum)	
pH (s.u.)		6.0-9.0 (minimum-maximum)	
Total Suspended Solids (mg/l)		45 (7-day average), 30 (30-day average)	
TSS (% removal)		85 (30-day average)	
Total Suspended Solids (mg/l), Non-aerated waste stabilization ponds*		160 (7-day average), 105 (30-day average)	
Total Suspended Solids (mg/l), Aerated waste stabilization ponds*		110 (7-day average), 75 (30-day average)	
Regulation No. 73 - Chatfield Watershed Control Regulation			
Phosphorus, mg/l		1.0 mg/l (30-day average) and compliance with LAMP	
Phosphorus, lbs/year		1,233.0 lbs/year and compliance with LAMP	
Regulation No. 84 - Category 3 Reclaimed Water for Centralized Reclaimed Water Treatment System			
Turbidity NTU		3 (monthly avg.) not to exceed 5 in more than 5% of individual samples	
E. coli cfu/100mL		None detected in at least 75% of samples per calendar month and 126/100mL single sample max	
Regulation No. 84 - Category 3 Reclaimed Water for Localized Reclaimed Water Treatment System			
	Enteric Viruses	Parasitic Protozoa	Enteric Bacteria
Log ₁₀ Reduction Target (10 ⁻⁴) Category 3	8.5	7.0	6.0

*Where adjusted TSS limitations are used, the 85 percent removal requirement for TSS shall be waived, pursuant to Regulation No. 62.





Dedicated to protecting and improving the health and environment of the people of Colorado

Appendix A
Purpose and Basis for Preliminary Effluent Limitations
Pine Canyon Water Reclamation Facility

Introduction

The Water Quality Control Division (division) has developed Preliminary Effluent Limitations (PELs) for Pine Canyon Water Reclamation Facility, proposed to be located in Douglas County Colorado. This evaluation was conducted to facilitate issuance of PELs for pollutants of concern that may be discharged from a domestic and/or industrial WWTF. PEL were developed based on the following assumptions:

- the facility’s maximum month daily average hydraulic design capacity is 0.405 million gallons per day (MGD);
- the facility will reclaim 100% of its treated domestic wastewater under the division’s reclaimed water program and will have zero effluent discharge to groundwater;
- the facility is located in the Chatfield Reservoir Watershed where the requirements of Regulation 73 - Chatfield Reservoir Control Regulation apply;
- the facility will meet applicable Regulation 73 phosphorus limitations through the implementation of a land application management plan (LAMP) pursuant to Regulation 73.4(2)(c);
- the point of compliance with permit effluent limitations and Regulation 84 reclaimed water limitations is “end-of-pipe” (prior to the lined storage impoundments and distribution of reclaimed water). Groundwater monitoring wells will not be approved as points of compliance.

Facility Location

The proposed facility location is shown in Figure A-1. The latitude and longitude of the proposed facility location is approximately:

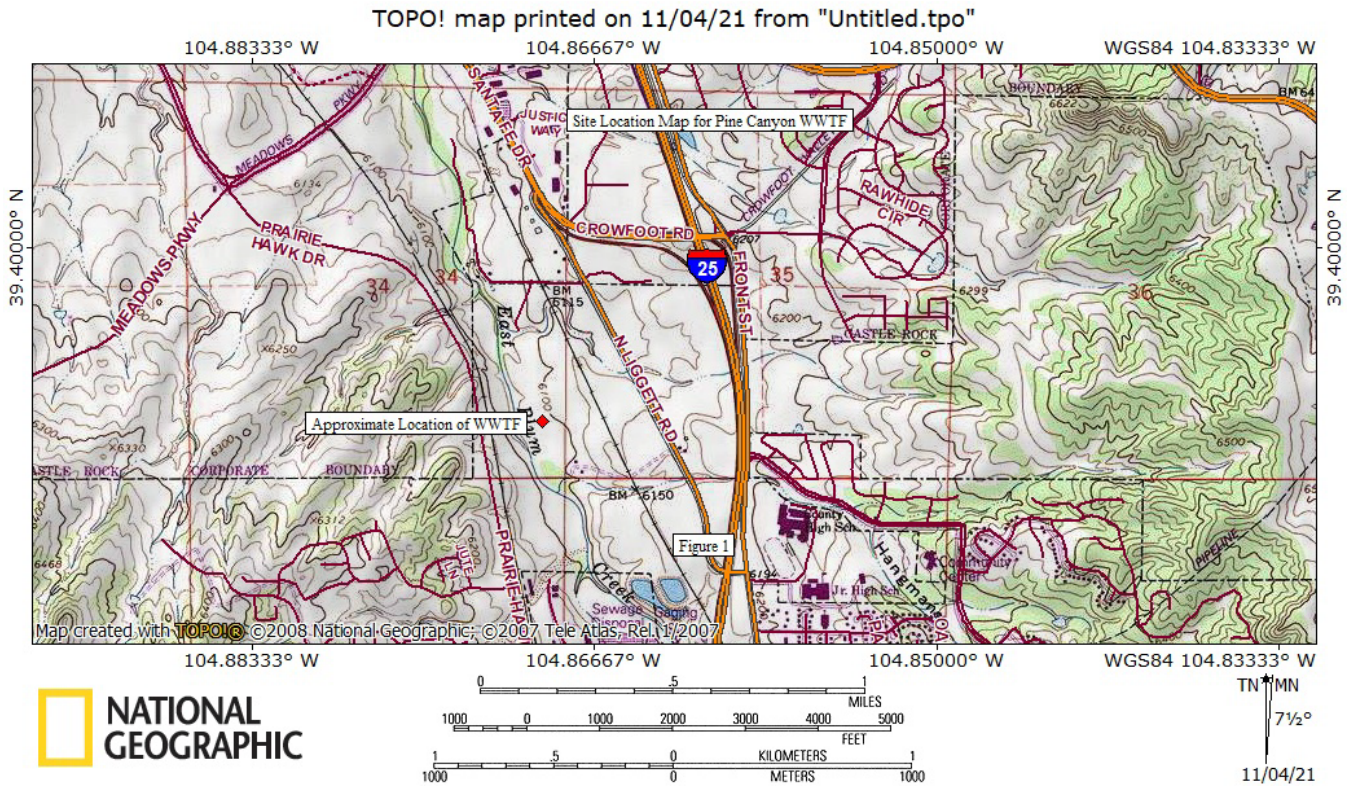
Latitude: 39.39609444 North
Longitude: -104.86533333 West

Figure A-1 - Location Map:





Dedicated to protecting and improving the health and environment of the people of Colorado



BASIS FOR DEVELOPMENT OF LIMITATIONS

Pollutants of Concern

The following pollutants of concern are applicable to wastewater treatment facilities located in the Chatfield Reservoir Watershed that reclaim 100% of their treated domestic wastewater under the division’s reclaimed water program and discharge zero effluent to groundwater:

- Biological Oxygen Demand (BOD)
- Total Suspended Solids (TSS)
- Oil and Grease
- pH
- Phosphorus
- Turbidity
- E. coli

The PEL application did not identify additional pollutants of concern. Minor domestic wastewater treatment facilities (WWTFs) that do not receive industrial waste generally do not have other parameters such as metals, organics and radionuclides, present at concentrations that have reasonable potential to cause or contribute to an exceedance of a water quality standard and, therefore, additional pollutants of concern were not evaluated in this PEL. However, if future information establishes a reasonable potential for other pollutants to be present at such concentrations, discharge permit effluent limitations for these parameters may be added at that time. The applicable water quality standards and technology-based limitations for these pollutants are contained in the following regulations:





Dedicated to protecting and improving the health and environment of the people of Colorado

- Regulation No. 41: The Basic Standards for Groundwater
- Regulation No. 62: Regulations for Effluent Limitations
- Regulation No. 73: Chatfield Reservoir Control Regulation
- Regulation No. 84: Reclaimed Water Control Regulation

Regulation No. 41 - Water Quality Based Groundwater Standards:

Groundwater standards for a domestic and/or industrial WWTF are provided in Tables 1-4 of Regulation No. 41 - The Basic Standards for Groundwater. The majority of the numeric standards listed in Regulation 41 are the maximum contaminant levels (MCLs) for public drinking water supplies, as established by the National Primary Drinking Water Regulations. The remainder are derived from the Colorado Basic Surface Water Standards.

Given that the proposed Pine Canyon Water Reclamation Facility will reclaim 100% of its treated domestic wastewater under the division's reclaimed water program and will have zero discharge of effluent to groundwater, water quality based groundwater standards are not applicable to the discharge, and thus PELs based on Regulation 41 are not included in Table 1.

Regulation No. 62 - Technology-Based Limitations:

Table 1 includes PELs for technology-based standards applicable to all discharges of wastewater to State waters, with the exception of storm water and agricultural return flows. These standards are provided in Regulation No. 62 - Regulations for Effluent Limitations. The permittee will be required to meet technology-based standards at "end-of-pipe" (prior to the lined storage impoundments and distribution of reclaimed water).

Regulation No. 73 - Chatfield Watershed Control Regulation:

Regulation No. 73 - Chatfield Reservoir Control Regulation manages and regulates the amount of phosphorus that is allowed to be discharged into the Chatfield Watershed and/or Reservoir. Regulation No. 73 regulates the pounds per year of phosphorus and the concentration of phosphorus at the point of discharge or in lysimeters. Point source dischargers are listed in Regulation 73 by their legal name, and the regulation includes the pounds per year of phosphorus each facility is authorized to discharge. Each of these facilities is required to meet a phosphorus effluent limitation of 1.0 mg/l for a 30-day average at the design capacity of the wastewater facility except as provided in section 73.3(2)(f), and the annual wasteload allocation specified in the regulation except as provided in 73.3(2)(e),(g),(h), and (i).

Pine Canyon Water Reclamation Facility has not obtained a wasteload allocation for phosphorus in Regulation 73. Table 1 therefore includes a PEL of zero for phosphorus.

Pine Canyon Water Reclamation Facility is currently developing a land application management plan (LAMP) to ensure zero discharge of phosphorus to groundwater. Where the LAMP identifies a calculated phosphorus effluent concentration that results in a zero discharge of phosphorus to groundwater, this division will modify this PEL to include the calculated phosphorus value as an effluent limitation, along with any other applicable control measures, monitoring requirements, or other requirements necessary to implement and maintain the LAMP.

Note that where a LAMP is used to control discharges of phosphorus to state waters, the permittee will be required to meet a calculated phosphorus value at "end-of-pipe" (prior to the lined storage impoundments and distribution of reclaimed water).

Regulation No. 84 -Reclaimed Water Control Regulation:

The PEL application specified the following proposed uses of reclaimed water which requires Category 3 water:

- Unrestricted-Access Landscape Irrigation





Dedicated to protecting and improving the health and environment of the people of Colorado

- Agricultural Irrigation
- Non-Discharging Construction and Road Maintenance
- Toilet and Urinal Flushing

Based on these proposed uses, Table 1 includes applicable PELs for the Category 3 use of reclaimed domestic wastewater per Regulation No. 84 - Reclaimed Water Control Regulation.

In a follow-up email to the division dated September 28, 2021, the applicant also indicated that the treatment system will be defined as a Centralized Reclaimed Water Treatment System per Regulation 84 section 84.5(8). At the onset of construction, the population of the community (< 1,000) will deem it necessary for reclaimed water treatment to meet Localized System treatment requirements. However, the division will grant a variance from Localized System requirements as long as the only use of reclaimed water is restricted-access landscape irrigation. The following requirements in Regulation 84 must be complied with for the duration of the variance:

- 43 acres of non-food crops and silviculture that are inaccessible to the public will be irrigated.
- The irrigated area will be blocked by a railroad with no crossing by the general public and by a gated fence.
- The conditions of the LAMP (Reg. 73 compliance) will be met.
- The variance from meeting localized system treatment requirements for Regulation 84 will expire after three years from the issuance of the Treater Authorization with an opportunity to apply for an extension.
- Once the population of 1,000 is reached, the variance will be discontinued and the centralized treatment system will produce Category 3 Plus reclaimed water for the intended authorized applications.

In addition to meeting the water quality standards in Table 1, proper filtration and disinfection must produce reclaimed water that reliably achieves the following requirements (in the event of a conflict between Regulation #22 and these filtration and disinfection requirements, these requirements shall control over any conflicting filtration and disinfection requirements in Regulation No. 22):

1. Disinfection that provides a minimum of 99.999 (5-log) inactivation of enteric viruses through one of the following treatment techniques:
 - a. For free chlorine or monochloramines, log inactivation of viruses to be determined as referenced in 5-CCR-1002-11 and defined by the USEPA for disinfection of surface water (Hepatitis A), or
 - b. Minimum UV of 40 mJ/cm² using a validated reactor per the Ultraviolet Disinfection Guidance Manual for the Final Long Term 2 Enhanced Surface Water Treatment Rule (November 2006).
2. Filtration by any one of the following treatment techniques:
 - a. Conventional or direct filtration,
 - b. Membrane filtration accepted for use by the division in accordance with section 11.8 of 5 CCR 1002-11,
 - c. Bag or cartridge filtration accepted for use by the division in accordance with section 11.8 of 5 CCR 1002-11, or
 - d. Alternative filtration technologies accepted by the Division in accordance with Wastewater Design Criteria Alternative Technology Acceptance that is third party challenge tested to reliably remove 99.9% of challenge particles that are at most 3 micron diameter.

Additionally, any recycled spent filter backwash water, thickener supernatant or liquids from the dewatering process must be returned to a location within the treatment process that is before the filtration technology or an alternative Department-approved location. For conventional or direct filtration, the location of return must be prior to the coagulant feed location. For all other filtration technologies, the location of return must be prior to the filtration process and approved by the Division.





Dedicated to protecting and improving the health and environment of the people of Colorado

The effluent quality from Pine Canyon Water Reclamation Facility will be expected to meet the appropriate Category Standards at the reclaimed domestic wastewater point of compliance. The point of compliance with permit effluent limitations and Regulation 84 reclaimed water limitations is “end-of-pipe” (prior to the lined storage impoundments and distribution of reclaimed water) and will be so noted in the Notice of Authorization, which is issued by the Permits Section. The Pine Canyon Water Reclamation Facility will be required to obtain a Notice of Authorization from the Permits Section prior to treating, distributing and using reclaimed water (see details of uses in Regulation 84). To expedite the reclaimed water permitting process, the Pine Canyon Water Reclamation Facility may submit a Letter of Intent to the Division during the site approval process. The Notice of Authorization for approved uses at the facility will not be issued until the site approval process is complete for the facility.

In addition to meeting the appropriate Category Standards, the Pine Canyon Water Reclamation Facility must control the rate of irrigation to ensure the application of effluent is at or below agronomic rates for nutrients and/or evapotranspiration rates. The treatment facility and the end user will also be required to meet additional monitoring, reporting and management practices. These are further described in Regulation No. 84.

References

Monitoring and Reporting Requirements for Reclaimed Water Treatment Facilities, Water Quality Policy (WQP) 25

The Basic Standards and Methodologies for Surface Water, Regulation 31.

The Basic Standards for Groundwater, Regulation 41.

Site-Specific Water Quality Classifications and Standards for Groundwater, Regulation 42.

Colorado Discharge Permit System Regulations, Regulation 61.

Regulations for Effluent Limitations, Regulation 62.

Reclaimed Water Control Regulations, Regulation 84.

Site Location and Design Approval Regulations for Domestic Wastewater Treatment Works 5 CCR 1002-22.





Dedicated to protecting and improving the health and environment of the people of Colorado

Appendix B
 Agricultural Rate Review for the Pine Canyon LAMP
 Colorado Water Quality Control Division

1.0 Introduction

This Land Application Management Plan (LAMP) review concerned three (3) agronomic parameters, namely; evapotranspiration (ET), nitrogen (N) and phosphorus (P). Agronomic rate calculations for these parameters, based on the proposed plants/crops, were conducted to determine the most limiting parameter, on which any permitting limitations would be based. In the case of Pine Canyon LAMP, special attention was attributed to the agronomic rate of phosphorus, since the facility is located within a phosphorus control regulation zone.

The proposed facility is designed to generate 0.405 MDG of municipal wastewater with maximum effluent concentrations of 10 mg/l and 1 mg/l for nitrogen and phosphorus, respectively. The LAMP also includes a phosphorus concentration of 0.16 mg/l as an option if/when needed to be used.

Based on a 0.405 MGD design capacity, the facility will be producing 147,825,000 gallons of water per year. This figure is adequately conservative, due to engineering requirements that necessitate reevaluation of maximum daily output should the system ever approach 95% (0.385 MGD) of the current maximum output.

Wastewater will be stored in the interim within a 17.4 acre pond with a 10 foot maximum depth. Based on 10-year pond evaporation information from the Lower South Platte Water Conservancy District, this pond is expected to provide an evaporation loss of 19,035,882 gallons of water per year. Therefore, a treated wastewater amount of 128,789,118 (147,825,000 -19,035,882) gallons per year will be available for irrigation.

In the LAMP, a total of 255.4 acres of land is proposed to be irrigated with the treated wastewater from the proposed facility. Irrigated land included 3 types of plants/crops; turf lawn (28.9 (residential) + 63.5 (commercial) = 94.1 acres), trees and shrubs (11.1 (residential) + 107.9 (commercial) = 119 acres) in residential and commercial lands, and alfalfa crop (42.3 acres) for agricultural production.

2.0 Agronomic Parameter Evaluation Results

2.1 Evapotranspiration

Appropriate land-based application rates and total volumes of wastewater are based on soil properties and water-loss rates from evaporation and transpiration. Reasonable estimates of evapotranspiration (ET) for each of the three proposed vegetation communities were assimilated through literature review, and via communications with various experts. These ET values are considered the maximum amount of water that can be applied to a system without causing deep percolation, and to a runoff. The feasibility of proposed irrigation associated with this LAMP has focused on deep percolation, total irrigation water volumes, and nutrient loading; but runoff can only be prevented through appropriate, site-specific management of irrigation waters considering both application rates, duration, and frequency.

The division reviewed the seasonal distribution of ET estimates proposed in the LAMP calculations in comparison to water use data from nearby CoAgMET stations, and found the data to be reasonable.

Turf Grass Vegetation Community

The estimated ET rates for the turf grass were based on publications and personal communications with Dr. Koski (Koski 2012 and 2021). Weekly ET rates were adjusted upward based on personal communications with Dr Koski, and assimilated to monthly rates, resulting in a total ET rate of 32.3 inches for the irrigation season (Table 2-1, below).

Table 2.1 Estimated ET for Turfgrass Lawns

Month	April	May	June	July	August	September	October	Total





Dedicated to protecting and improving the health and environment of the people of Colorado

Weekly ET ¹ (in.)	0.75	1	1	1.5	1.5	1	0.75	7.5
Weekly ET ² , Adjusted, (in)	0.75	1	1.33	2	2	1	0.75	8.83
Monthly ET (inches)	1.5*	4	5.3	8	8	4	1.5*	32.3

*Two-weeks of water application assumed.

¹Master Gardner 2012

²Recommended upward adjustment from Dr.Koski

Tree and Shrub Vegetation Community

Tree and Shrub ET estimates were derived from standard agricultural formulations utilizing a reference ET (realistic upper maximum) and a crop coefficient (Kc; measured, average proportion of ET relative to Reference ET). Reference ET's are variable across the state, with reasonable 10-year averages ranging from 38.95 inches to 56.16 inches. These Reference ETs, when converted to estimates of ET for trees and shrubs with a Kc of 0.5, yield estimates of 19.5 to 28.2 inches of ET for this vegetation community.

Proposed Irrigation water application depths are approximately 8.7 inches, and when considered along with average annual rainfall of approximately 10 inches, still falls well below the range of anticipated water needs for most shrubs and trees. This suggests that an excess of irrigation water does not exist, and the proposed water balance for this community is sensible, possibly even requiring supplemental water.

Suggested spray head for the lawn and tree and shrubs is HE-VAN, manufactured by Rain Bird. A communication with the manufacturer of the product resulted in a “no water application efficiency” outcome for the product. Therefore, a water application efficiency for HE-VAN type sprinkler head in the LAMP was 80%. This means that the 20% more water than the water needed by the plant would be applied to the LAMP area. This water amount would either going to deep percolation of running off the site or both. This can be a concern about the whole system even though the contractor says that all the runoff will be collected in treatment ponds for removal of phosphorus before it is released. If release to the creek then some other permitting may apply. The facility will have to work with the Permits Section to address it. A special attention will have to be paid to the potential runoff water from the irrigated sites to lead the water to the treatment ponds.

Controlling irrigation duration, application rate and frequency may overcome some of these concerns. Also, installing appropriate soil-moisture equipment(s) may be required to ensure no or limited deep percolation and runoff. Relatively frequent, shorter duration irrigation events should be encouraged. Review of sprinkler system will determine if runoff or being generated, may need to adjust irrigation events to 2 or 3 times daily if runoff is being generated.

Alfalfa Production Area

For alfalfa, annual ET rate was varying depending on the literature. Berrada and Reich (2011) of Colorado State University (CSU) suggested that it was 31.6 inches whereas Schneekloth and Andales (2017), also CSU scientists, provided an ET rate for alfalfa as 37.1 inches. Since the 37.1 inches of ET rate is more recent, it is allowed in this evaluation. For the water efficiency for center pivot system, a proposed method for water application was assumed to be 80% by the contractor. It should be noted that the nature of the irrigation systems again 20% of more water than the needed by the plant has to be applied to satisfy plant needs. The higher the water application efficiency the higher the water retention in the root zone.





Dedicated to protecting and improving the health and environment of the people of Colorado

Schneekloth and Andales (2017) also provided an ET rate for the tall grass which is 25.7 for Greeley area. This value is also found to be appropriate for the LAMP calculations because it is relatively recent recommendation by the CSU scientists.

Water Balance Calculations

Precipitation data for Denver, CO was taken from <https://www.weather-us.com/en/colorado-usa/denver-climate>. Average annual precipitation for Denver is 12.95 inches. Months where the District would not be irrigating were removed (November-February: 2.12 inches). Thus, the precipitation during the irrigation months (March-October) is 10.83 inches. Therefore, the precipitation during the irrigation months (March-October) of 10.83 inches subtracted from the ET rates for determining the net irrigation amount to be applied to meet the agronomic rate for water consumption. No watering will be occur on measurable precipitation days.

As a result, 112,984,782 gallons of water is needed by the plants in whole project are to satisfy the recommended crop agronomic rate. This amount does not consider irrigation application efficiency which would result in a larger amount of water rate. Considering a water application efficiency of about 80% for pressurized systems for spray heads and for center pivot system which will be used in the LAMP area, total water needed would be 141,230,977 (Table 1) gallons per year. The maximum treated wastewater produced per year would be 147,825,000 gallon. Since the water will be stored in a 17.4 acre pond with a 10 feet depth, an evaporative loss of 19,035,882 gallons is expected and therefore, a treated wastewater amount of 128,789,118 will be available for irrigation purposes. This amount is 12,441,859 gallons lower than the treated wastewater needed for irrigation purposes. This means that the facility will not be producing sufficient water to satisfy crop water requirements through application of treated wastewater. The difference can be made up either by

- a) a supplemental irrigation from tap and/or well water(s) or
- b) increasing irrigation efficiency (data can support an irrigation efficiency up to about 87%) or
- c) reducing the irrigated land with special attention to the other parameters.

Therefore, this LAMP is satisfactory from the water use/application point of view which is the basis for nitrogen and phosphorus applications.

Table 2-2. Summary of agronomic rates and associated parameters for water use, phosphorus and nitrogen.

Parameter	Recommended Application Rate	Actual Application Rate	Allowance Remaining
Water (gal)	141,230,977	128,789,118	12,441,859
Nitrogen (10 mg/L TN in effluent)	37,153	12,329	24,824
Phosphorus (1 mg/L TP in effluent)	4,862	1,233	3,629
Phosphorus (0.16 mg/L TP in effluent)		197	4,665





Dedicated to protecting and improving the health and environment of the people of Colorado

2.2 Nitrogen

The facility is to produce treated wastewater with 10 mg/l nitrogen in the effluent. Since the 19,035,882 gallons of water is evaporated, the initial concentration of 10 mg/l would be increased to 11.48 mg/l. Therefore, this concentration is used in the calculation which provides the most stringent agronomic rate for nitrogen application.

Nitrogen rates for the turf lawn are based on Kansas State University recommendations for medium quality Kentucky bluegrass. Application rates are 3 lbs per 1000 sq ft area, comparable to recommendations from CSU extension (3.5 to 5 lb of nitrogen). If grass clipping are returned to the turf then these amounts can be reduced by $\frac{1}{4}$ to $\frac{1}{3}$.

Considering the most conservative case, the nitrogen application rate for a high maintenance bluegrass would be 3.5 lbs per 1000 square feet of turf area. Based on these recommendations, 3 lb/100 sq ft application rate for the young lawn is considered to be appropriate. The age of turf is a factor for nitrogen application considerations, and as the lawn matures the N requirements typically decline. CSU recommends that turf receive 1 lb N at 30 years (Koski, 2021) (<https://cmg.extension.colostate.edu/wp-content/uploads/sites/59/2020/01/GN-550-Turf-Management.pdf>) and (<https://extension.colostate.edu/topic-areas/yard-garden/lawn-care-7-202/>).

Similar application rates were considered for the residential ornamentals and tree and shrubs suggested by the LAMP, based on North Carolina State University (NCSU) recommendations. NCSU recommendations are based on delivering a seasonal total of approximately 4 lbs N/1,000 square feet of bed area for. Considering the suggested rate in the LAMP is 75% of that of the NCSU, the proposed rate is considered appropriate even considering minor regional variations.

Appropriate nitrogen application rates for alfalfa are somewhat complicated considering alfalfa usually fixes nitrogen. CSU recommends a total of 0 to 20 lb/acre nitrogen for seedlings depending on the soil nitrogen content. However, in an email, the consultant indicated that based on Keoning et al. (2009), alfalfa removes 50-70 nitrogen/ton harvested. In fact, Keoning et al. (2009) states that when nitrogen is supplied via wastewater or manure, alfalfa preferentially absorbs nitrogen from the soil rather than fixing it from the atmosphere. A reasonable nitrogen application rate for disposal situations is 80% of the nitrogen removed by the crop. In the LAMP, the yield goal is set to 5.5 tons per acre. Based on Johnson et al. (2000) average alfalfa yield can range from 5.85 tons per acre in Rock Ford, CO to 8.25 tons per acre in Wiggins, CO. Therefore, the 5.5 tons per acre on average used in the LAMP would be appropriate. Finally, considering 50 nitrogen/ton harvested (low end of the range) and using 5.5 ton per acre yield goal (lower end of the yield averages), the alfalfa can use 275 lbs per acre nitrogen, with an 80% removal rate, the crop needed nitrogen would be 220 lbs/acre. This amount is significantly higher than that is recommended by Mortvedt et al. (1996) and will allow alfalfa for luxury nitrogen use which is allowable. The recommendation of 220 lbs per acre, in fact is in line with Dr. Joe Brummer (Personal communication, 2022) of CSU whose suggestion was about 240 lbs/acre as he mentioned that alfalfa will not fix the nitrogen and utilize available nitrogen. Furthermore, nitrogen application will be regulated by the reuse Notice of Authorization and, therefore, it is a secondary parameter for this review.

2.3 Phosphorus

As a reference for appropriate application rates of phosphorus, medium quality general turf cited from Kansas State University suggests 1 lbs per 1000 square feet of P₂O₅ (translating into a 19.04 lbs phosphorus/acre/year). This application rate is recommended when the Bray P-1 method soil test available-P levels are between 10 and 20 ppm, appropriate for the majority of the LAMP area.

North Carolina State University suggests 1 to 2 lbs of P₂O₅ for 1000 ft² for soil low in phosphorus. As noted before, the phosphorus content of the LAMP area is generally low in phosphorus and therefore the rate of 1 lbs of P₂O₅ for 1000 ft² for soil was considered conservatively appropriate even though other conditions such as climate, rainfall amounts could be different.

In Colorado, Koski and Skinner (2012) suggest balanced or complete fertilizers contain various amounts of phosphorus, potassium, iron and sulfur since they are a good safeguard against a potential nutrient deficiency for lawn. Furthermore, they state that phosphate fertilizer applied to a lawn or garden soil is bound to the soil and does not leach into ground water. Similar conclusions were also reached following a review of the LAMP and local NRCS soils information by Robert Murphy, a soil scientist with CDPHE. He stated that surface pH was measured as slightly acidic to neutral which could allow for slight mobilization of phosphorus, but a look at the deeper horizons shows that pH increases with depth, as would be expected, so the Phosphorus leaching would not be anticipated. He also cited the





Dedicated to protecting and improving the health and environment of the people of Colorado

availability of calcium carbonate mentioned in the LAMP by Dr. Ippolito, and agreed that calcium carbonate will immobilize phosphorus by forming stable mineral phases which prevent leaching.

LAMP calculations considered a recommended application rate of 19.04 lb/acre of P₂O₅. This rate is quite conservative when compared to reasonable application rates ranging from 50-200 lb/acre of P₂O₅ for new seedlings in low-phosphorus soils.

To calculate the total amount of Phosphorus applied to the LAMP per year, a conversion factor of 0.437 (Keoning et al. 2009) was used to convert from P₂O₅ to elemental P. Based on the 1 mg/l phosphorus concentration in the effluent, and the applied water amounts, a total of 1,233 lb/year phosphorus would be applied to the LAMP area. This is considerably lower than reasonable recommendations, which total approximately 4,862 lb/year. Therefore, it is not anticipated that overapplication of Phosphorus will occur due to application of treated wastewater water.

3.0 Discussion

As detailed in Tables 2-2 (above) and Table 2-3, the actual applied nutrients are considerably lower than reasonable recommended rates, and therefore should not constitute any issues regarding leaching of nutrients beyond the rootzone, if irrigation waters are managed appropriately. Annual applications of nitrogen and phosphorus are about 33% and 25% lower, respectively, than what can be reasonably expected to be uptaken by vegetation within the LAMP. Therefore, additional nutrient application(s) might be needed to sustain healthy crop/plant development in the area.

Table 2-3. Summary of recommended and actual N and P amounts applied through treated wastewater.

Crop/Plant	Recommended N (lbs/year)	Applied N (lbs/year)	Recommended P (lbs/year)	Applied P (lbs/year)
Lawn	12,303	6,568	1,792	657
Ornamental Beds	15,549	3,343	2,265	334
Agricultural Crop	9,302	2,418	805	242
Total	37,153	12,329	4,862	1,233

Special Conditions for Phosphorus Treatment Levels

The LAMP occurs within a phosphorus zone of concern, with significant lands immediately adjacent to surface waters. The LAMP also proposes continuous use of treated wastewater containing phosphorus levels of approximately 1 mg/l. Given site conditions, this level seems to be appropriate for land application and would provide under fertilization for the selected crops. Although deep percolation is not anticipated to be a concern, any amount of phosphorus discharged to surface waters is not acceptable, and irrigation and land management practices will determine the success of the LAMP wastewater management plan in preventing surface water pollution.

EPA recommends soil phosphorus levels be monitored where sludge applications are used continuously over time, especially in cropped areas where sludge application rates may need to be determined by crop phosphorus needs rather than the nitrogen needs of the crop. Given that organic-bound phosphorus will not be readily available for the plant use and could accumulate overtime, annual soil monitoring will be required to inform:

1. Nutrient application rates; and





Dedicated to protecting and improving the health and environment of the people of Colorado

2. Soil phosphorus levels over time. If organic phosphorus builds up in soils over time, then the facility will need to treat for phosphorus down to 0.16 mg/l levels until a safe phosphorus level is achieved (a maximum of 50% of initial level). Sampling will be conducted at the same time every three years, prior to irrigation season, or in the fall following the final irrigation events.

Furthermore, if at any point the facility is to exceed (or expected to exceed) any of the agronomic rate(s) at 1 mg/l phosphorus case then the facility will address the situation by either:

1. moving to 0.16 mg/l treatment option case for phosphorus as the LAMP considers it as an option or
2. move the wastewater out of the watershed

The return water collection ponds to treat phosphorus will have to be maintained with annual checks. All necessary maintenance to be conducted to ensure integral full functioning of the ponds.

When crop rotation is needed for the agricultural fields, then the facility will find a crop similar to alfalfa in terms of crop agronomic needs to avoid changing the applications rate(s). This will allow minimum changes to overall conceptual plan and avoid substantial revisions or reviews moving forward. Soil samples collected to inform application rate determinations should exhibit representative coverage of the three vegetation communities and NRCS designated soil types across the LAMP. Results will be averaged and the agronomic rate will be based on the average.

Additional Considerations

Even though it is not a part of this LAMP evaluation, salinity and sodium level(s) of the treated waste water is a significant, relevant parameter. Crop water use would be impacted if the electrical conductivity is not suitable for selected crops/plants, and may also result in burning of leaves if the water is chloride and sodium laden. Alfalfa is particularly sensitive to Salinity. Furthermore, if the sodium concentration of the treated wastewater is even moderately elevated, then it will result in infiltration and permeability concerns in local soils. Bauder et al. (2014) provides detailed information about irrigation water quality criteria for crops. Salinity monitoring could be essential to achieving sustainable water applications and beneficial nutrient disposal in the LAMP area.

Managing the slow accumulation of salts within irrigated soil systems typically requires leaching to remove problematic salinity levels. Due to watershed characteristics and the site location being immediately adjacent to surface waters, the need to leach salts, if it were to arise, would create long-term management issues that could significantly hinder the feasibility of wastewater land applications for this project. This scenario would constitute reengagement and additional review and scrutiny from the Division. If any salinity leaching/flushing is applied, it will need to be scheduled at a time that the phosphorus levels would be the lowest. Any leaching/flushing water (if rainfall is not sufficient) will be a phosphorus-free water.

Layout and installation of irrigation systems should consider minimizing and avoiding the application of nutrient-laden waters to impermeable surfaces. Direct discharge to storm drains is a primary source of Phosphorus and nutrient pollution in surface waters, and is unacceptable due to site and watershed characteristics.

4.0 Summary

Proposed reuse of wastewater for irrigation purposes within this LAMP has been reviewed and approved by the division. The feasibility of proposed irrigation associated with this LAMP has focused on deep percolation, total irrigation water volumes, and nutrient loading; but runoff can only be prevented through appropriate, site-specific management of irrigation waters considering both application rates, duration, and frequency. Additional agronomic parameters not addressed in this LAMP (discussed above) will be critical to developing a sustainable wastewater management system that avoids impacting operations and creating additional management expenses. Continued approval of wastewater application is contingent upon successful nutrient and water management, and is revocable if found in violation of permit stipulations or management commitments.

An annual report detailing land management activities is required, and shall be submitted to the division’s permit’s unit. The annual report will include a detailed table showing water applications in term of time that the systems were run and the amounts of investigated parameters applied. Below is an example summary table that will be provided in the annual report to show applied water, nitrogen and phosphorus amounts were not exceeded the allowable amounts.





Dedicated to protecting and improving the health and environment of the people of Colorado

Table X. Applied water, nitrogen and phosphorus amounts in year 20XX as compared to allowable amounts

Parameter	Water (gallon)	Nitrogen (lbs)	Phosphorus (lbs)
Allowance	141,230,977	37,153	4,862
Actually Applied			

Content of this report will also include:

1. Soil sample results from all irrigated areas (bluegrass, tree and shrub, and agricultural fields), along with the calculated agronomic rates for fertilizer applications to each for the three proposed vegetation communities. Soil samples should be collected at the same time each year, in the fall or spring. Soil testing for nutrients will use appropriate methods for the nutrients (nitrogen and phosphorus) if the results would be depend on any specific soil parameter such as pH in case of phosphorus.
2. Soil initial and current phosphorus contents will be identified to address organic phosphorus accumulation.
3. Photographs of each vegetation community during peak vegetative cover (approximately August).
4. Photographs demonstrating the integrity and function of sedimentation ponds, surface water routing features, retention basins, and other water management infrastructure.
5. A brief narrative detailing reviews and maintenance activities concerning surface water management features, such as impoundments and retention basins, or irrigation systems, and any issues managing water volumes.
6. Confirmation that irrigation water is not being discharged onto impermeable surfaces or into storm drains, and that no unpermitted discharges to surface waters have occurred within the calendar year.
7. Confirmation that landlords did not applied full nutrient requirements (especially phosphorus) to their lawn and apply only the difference between agronomic rate and the amount provided by the treated waste water. A mechanism will be put in to achieve this requirements before land application can start.
8. If agricultural crop is changed then its impact on the agronomic rates will be provided.

5.0 References

Berrada, A. and Reich, D. 2011. Alfalfa Irrigation Management. In Intermountain Grass and Legume Forage Production Manuel. II Edition. Compiled by Pearson, C.H., Brummer, J.E, Hammon, B. and Franklin, M.L. Technical Bulletin TB11-02 Agricultural Experiment Station. Colorado State University Extension.
<http://wci.colostate.edu/Assets/pdf/ForageManual/Chapter15.pdf>. Accessed on 11/23/2021.

EPA. Sludge as source of plant nutrients. <https://www3.epa.gov/npdes/pubs/mstr-ch4.pdf>. Accessed on 12/2/2021.

FAO, ????. Chapter 6 - ETC - Single crop coefficient (Kc). Accessed on 12/28/202.

Johnson, J.J., Hain, J.P., Johnson, C.L., Bosley, B.D., Pearson, C.H., Brummer, J.E., Dillon, M.A., Schweissing, F.C., Stack, M.C., Berrada, A. and Hooten, T.M. 2000. 2000 Colorado Alfalfa performance Trails.
https://webdoc.agsci.colostate.edu/csucrops/reports/alfalfa/alfalfareport_2000.pdf. Accessed on 1/20/2022.

Mortvedt, J.J., Smith, D.H. and Croissant, R.L. 1996. Fertilizing Alfalfa and Grasses. Crop Series no. 0.537. Accessed on 11/30/2021. https://erams.com/static/wqtool/PDFs/manure_nutrient/00537.pdf

Koenig, R.T., Horneck, D., Platt, T., Peterson, P., Stevens, R., Fransen, S. and Brown, B. 2009. Nutrient management guide for dryland and irrigated alfalfa in the Inland Northwest. A pacific northwest extension publication, PNW0611.

Koski, T. 2012. Turfgrass Management. Master Gardener. Colorado State University Extension.
<https://cmg.extension.colostate.edu/wp-content/uploads/sites/59/2020/01/GN-550-Turf-Management.pdf>. Accessed on 11/22/2021.





Dedicated to protecting and improving the health and environment of the people of Colorado

Koski, T and Skinner, V. 2012. Lawn Care-7.202. <https://extension.colostate.edu/topic-areas/yard-garden/lawn-care-7-202>. Accessed on 11/30/2021

Koski, T. 2021. Personal Communication. 11/22/2021

Schneekloth, J. and Andales, A. 2017. Seasonal Water Needs and Opportunities for Limited Irrigation for Colorado Crops - 4.718. <https://extension.colostate.edu/topic-areas/agriculture/seasonal-water-needs-and-opportunities-for-limited-irrigation-for-colorado-crops-4-718/>. Accessed on 12/6/2021.

T.A. Bauder, R.M. Waskom, P.L. Sutherland and J. G. Davis. 2014. Irrigation Water Quality Criteria - 0.506. <https://extension.colostate.edu/topic-areas/agriculture/irrigation-water-quality-criteria-0-506>. Accessed on 12/2/2021.



Attachment 22



MEMORANDUM

DATE: August 31, 2022

TO: Water Quality Control Commission
Jeremy Neustifter, Director, Environmental Boards and Commissions

FROM: Joni Nuttle, Senior TMDL Specialist, Restoration and Protection Unit, WQCD
Tammy Allen, Restoration and Protection Unit Manager, WQCD

RE: Division Review of the Chatfield Watershed Authority 2021 Annual Report

INTRODUCTION

The Chatfield Reservoir Control Regulation No. 73, 5 CCR 1002-73 is a watershed-scale implementation plan for meeting a total maximum annual load (TMAL) of total phosphorus (TP) to Chatfield Reservoir. The TMAL's purpose is to ensure the water quality of Chatfield Reservoir meets the site-specific water quality standards of 10 ug/L chlorophyll *a* and 0.030 mg/L TP. Both of these water quality standards include assessment thresholds for determining attainment of the standards. The control regulation defines the TP allowable load to the reservoir, allocates that load among point, nonpoint, background, and reservoir base-load sources, establishes a trading program, and specifies nonpoint source control, monitoring, and reporting requirements. As the Clean Water Act Section 208 management agency for the watershed, the Chatfield Watershed Authority (authority) is identified in the control regulation as the organization to oversee implementation of TP controls for point sources, including regulated stormwater, as well as nonpoint sources.

BACKGROUND

The control regulation requires the authority to submit an annual report to the Water Quality Control Commission (commission) by May 15 each year. Accomplishments discussed in the report are presented to the commission during annual briefings. The annual report provides information that demonstrates performance and status of point and nonpoint source controls of TP, as well as highlighting the activities undertaken in the watershed during the reporting period. Specifically, the report should include information on:

- Water quality monitoring
- Point source loadings and the status of compliance with discharge permit limits and conditions, as well as average monthly discharge monitoring data and annual phosphorus poundage for each permit
- Nonpoint source loadings and the status of nonpoint source control efforts
- Status of trades approved
- Model updates
- Recommendations on any new or proposed expansion of wastewater treatment facilities
- Recommendations for improving water quality, as appropriate

The control regulation provides additional guidance on annual report content including the evaluation of nonpoint source activities and programs as they relate to the goal of reducing nonpoint source



MEMORANDUM

phosphorus in Chatfield Reservoir and the monitoring of structural BMPs associated with nonpoint source to point source trades.

The annual report also discusses progress made on revising allocations in the control regulation. In 2009, the control regulation was revised to include an updated TMAL. However, at that time, revised allocations of that TMAL were not adopted. The control regulation identifies activities to support revisions of the allocations and directs the authority to implement these activities. The activities include:

- Partition the allowable load between the South Platte and Plum Creek basins
- Determine the allocations of loads within each basin
- Revise wasteload allocations
- Update definitions and regulation language to support TMAL revisions

ANNUAL REPORT HIGHLIGHTS

Highlights from the 2021 annual report include the status of water quality in Chatfield Reservoir.

During 2021, the growing season (July through September) average chlorophyll *a* concentration in the reservoir was 7.3 ug/L, which is below the water quality standard of 10 ug/L as well as the assessment threshold of 11.2 ug/L. The chlorophyll *a* standard allows an exceedance frequency of 1 in 5 years. The reservoir exceeded the chlorophyll *a* standard once in the last 5 years. Therefore, as of 2021, based on data reported in the annual report Chatfield Reservoir was in attainment of the site-specific water quality standard for chlorophyll *a*.

During 2021, the growing season (July through September) average TP concentration in the reservoir was 20 ug/L, which is below the water quality standard of 30 ug/L as well as the assessment threshold of 35 ug/L. The TP standard allows an exceedance frequency of 1 in 5 years. The reservoir has attained the TP standard in 4 of the past 5 years. Therefore, as of 2021, based on data reported in the annual report Chatfield Reservoir was in attainment of the site-specific water quality standard for TP.

The authority continues its work to collect water quality data in the basin and develop their watershed model. The authority also continues to coordinate and collaborate with the Chatfield Reservoir Mitigation Company (CRMC) on data collection and CRMC's Chatfield reservoir model. These models will inform revisions to allocations in the control regulation. The division looks forward to the authority's inclusion of model results in the 2022 annual report.

DIVISION COLLABORATION WITH THE AUTHORITY

The Water Quality Control Division's (division) work with the authority in 2021 was primarily focused on stakeholder processes scoping issues for triennial reviews and rulemaking hearings. The division appreciates the authority's commitment to these discussions and the progress that was made during the reporting period.

RECOMMENDATIONS

The division's participation in the authority's development of the annual report was limited to a review of the final report. The primary criterion the division used to evaluate the report was completeness



MEMORANDUM

with respect to the reporting requirements from the control regulation. The division finds that the annual report generally meets the reporting requirements. The annual report identified the need for more data collection to identify and quantify nonpoint sources of phosphorus in the Plum Creek Basin. The division agrees with this need. When resources allow, the division recommends more focused monitoring to evaluate nonpoint source projects in the watershed in order to document nonpoint source loadings and project effectiveness. This monitoring data and project effectiveness information would be particularly valuable to inform future nonpoint source projects and support evaluations of proposed trades, as well as the watershed modeling that is underway.

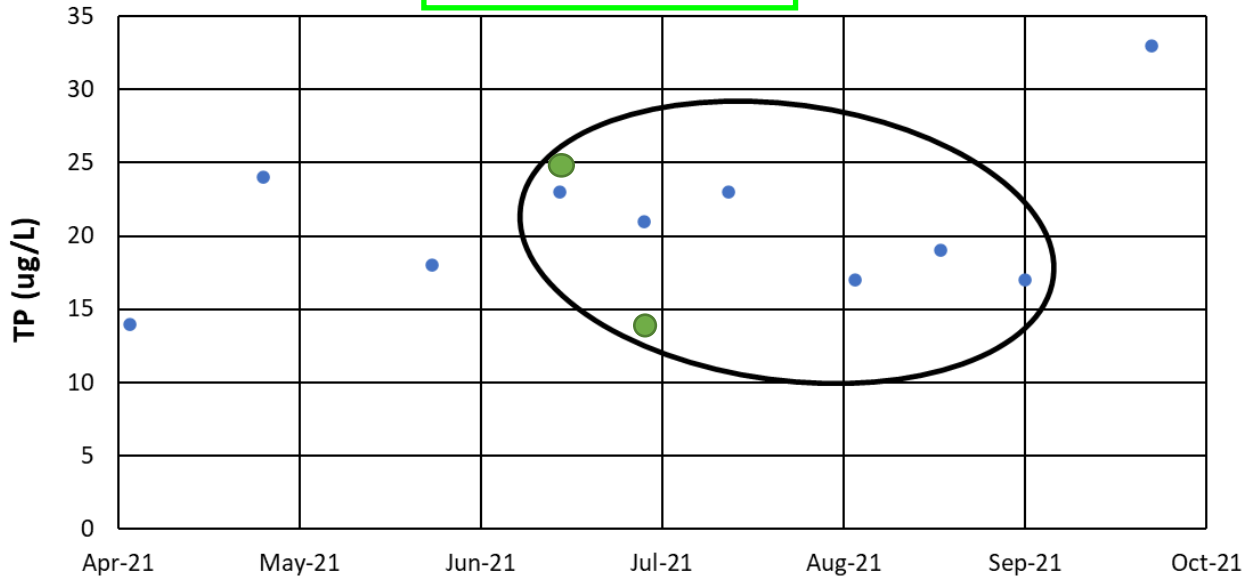
cc: Chatfield Watershed Authority

J:\WSRnP\Control Regulations\Chatfield\Annual Reports\2021\WQCC Correspondence CWA 2021AR.pdf

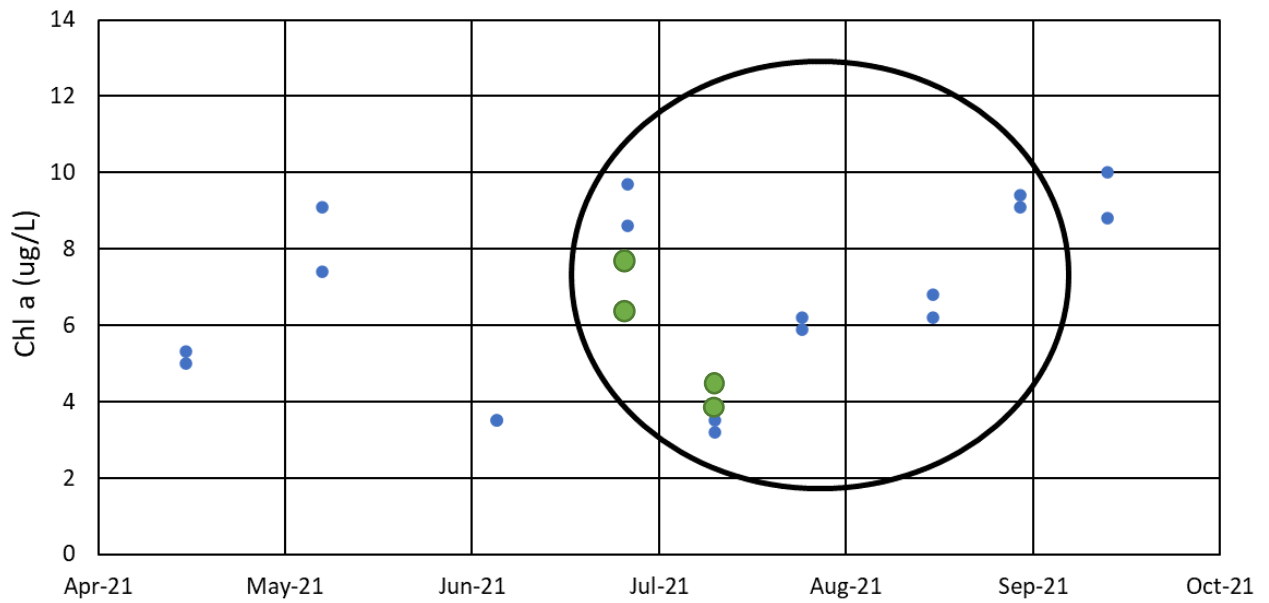
Attachment 23

2021
Chatfield Reservoir Centroid Total Phosphorus

GREEN IS 2022



2021 Chatfield Reservoir Centroid Chlorophyll *a*



Attachment 24

Chatfield Watershed Authority 2023 Board Election Schedule

Date 2022	Action	W&S Members	Other Members
Thursday, September 22nd	Request for nominations	Centennial WSD	Castle Pines MD
Tuesday, October 4th	TAC Meeting	Dominion WSD	Denver Water
Monday, October 17th	Board Meeting	Louviers WSD	Town of Larkspur
Friday, October 28th	Nominations due to Manager	Perry Park WSD	City of Littleton
Friday, November 4th	Send out ballots	Roxborough WSD	
Tuesday, November 1st	TAC Meeting	Plum Creek WRA	
Monday, November 14th	Board Meeting		
Tuesday, Decmber 6th	TAC Meeting		
Tuesday, December 13th	Election Results		

Attachment 25

2023 Chatfield Watershed Authority Schedule

		TAC Meetings		Board Meetings
Month	Materials Deadline	Virtual Meetings	Materials Deadline	Hybrid: Live/Virtual Meetings
January	Materials Deadline Tuesday, December 27th	Tuesday, January 3rd 2:00 – 4:00 p.m.	Materials Deadline Tuesday, January 17th	Monday, January 23rd 3:00 – 5:00 p.m. Location & Format?
February	Materials Deadline Tuesday, January 31st	Tuesday, February 7th 2:00 – 4:00 p.m.		
March	Materials Deadline Tuesday, February 28th	Tuesday, March 7th 2:00 – 4:00 p.m.		
April	Materials Deadline Tuesday, March 28th	Tuesday, April 4th 2:00 – 4:00 p.m.	Materials Deadline Tuesday, April 11th	Monday, April 17th 3:00 – 5:00 p.m. Location & Format?
May	Materials Deadline Tuesday, April 25th	Tuesday, May 2nd 2:00 – 4:00 p.m.		
June	Materials Deadline Tuesday, May 30th	Tuesday, June 6th 2:00 – 4:00 p.m.		
July	Materials Deadline Tuesday, June 20th	Tuesday, June 27th 2:00 – 4:00 p.m.	Materials Deadline Monday, July 10th	Monday, July 17th 3:00 – 5:00 p.m. Location & Format?
August	Materials Deadline Tuesday, July 25th	Tuesday, August 1st 2:00 – 4:00 p.m.		
September	Materials Deadline Tuesday, August 29th	Tuesday, September 5th 2:00 – 4:00 p.m.		
October	Materials Deadline Tuesday, September 26th	Tuesday, October 3rd 2:00 – 4:00 p.m.	Materials Deadline Monday, October 9th	Monday, October 16th 3:00 – 5:00 p.m. Location & Format?
November	Materials Deadline Tuesday, October 24th	Tuesday, October 31st 2:00 – 4:00 p.m.	Materials Deadline Monday, November 13th	Monday, November 20th 3:00 – 5:00 p.m. Location & Format?
December	Materials Deadline Tuesday, November 28th	Tuesday, December 5th 2:00 – 4:00 p.m.		

Attachment 26

**Chatfield Watershed Authority
Interim Financial Statements
August 31, 2022**

Chatfield Watershed Authority
Balance Sheet
As of August 31, 2022

	<u>Aug 31, 22</u>
ASSETS	
Current Assets	
Checking/Savings	
1000 · 1st Bank	411,097.23
Total Checking/Savings	<u>411,097.23</u>
Total Current Assets	<u>411,097.23</u>
TOTAL ASSETS	<u>411,097.23</u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
2000 · Accounts Payable	43,650.63
Total Accounts Payable	<u>43,650.63</u>
Total Current Liabilities	<u>43,650.63</u>
Total Liabilities	43,650.63
Equity	
32000 · Retained Earnings	302,018.77
Net Income	65,427.83
Total Equity	<u>367,446.60</u>
TOTAL LIABILITIES & EQUITY	<u>411,097.23</u>

Chatfield Watershed Authority
Profit & Loss
August 2022

	Aug 22	Jan - Aug 22
Income		
4000 · Operating Revenues - Membership		
Other Income	0.00	4,246.00
4001 · Jefferson County	0.00	28,986.00
4002 · Douglas County	0.00	75,510.00
4004 · Town of Castle Rock	0.00	75,510.00
4005 · Plum Creek Wastewater	0.00	2,400.00
4006 · Roxborough Park	0.00	2,400.00
4007 · Castle Pines Metro District	0.00	2,400.00
4008 · Perry Park W&S District	0.00	2,400.00
4009 · Denver Water Department	0.00	2,400.00
4010 · City of Littleton	0.00	2,400.00
4011 · Centennial W&S District	0.00	2,400.00
4012 · Town of Larkspur	0.00	2,400.00
4014 · Louviers Water & San. District	0.00	2,400.00
4016 · Sacred Heart Retreat House	0.00	2,000.00
4019 · Dominion W&S District	0.00	2,400.00
4038 · Denver Water- In Kind	2,125.00	17,000.00
4039 · Plum Creek - In Kind	1,666.67	13,333.36
4040 · Centennial - In Kind	1,953.83	15,630.64
4045 · Roxborough In Kind	266.67	2,133.36
Total 4000 · Operating Revenues - Membership	6,012.17	258,349.36
4103 · Interest Income	18.76	65.20
Total Income	6,030.93	258,414.56
Expense		
5000 · Expenditures - Operational		
5001 · Management Fees Technical	9,280.00	61,942.86
5002 · Management Fees- Authority	8,370.00	17,820.00
5003 · Website Hosting/Maint	0.00	2,848.00
5004 · NPS projects and Consultants	0.00	10,000.00
5005 · Legal - Admin	13,642.00	45,828.51
5007 · Professional Fees-Financial	750.00	6,000.00
Total 5000 · Expenditures - Operational	32,042.00	144,439.37
5100 · Expenditures - Contractual		
5111 · Monitoring- in Kind	6,012.17	48,097.36
5117 · Public Outreach Sponsorships	0.00	450.00
Total 5100 · Expenditures - Contractual	6,012.17	48,547.36
Total Expense	38,054.17	192,986.73
Net Income	-32,023.24	65,427.83

Chatfield Watershed Authority
Profit & Loss Budget vs. Actual
 January through August 2022

	Jan - Aug 22	Budget	\$ Over Budget	% of Budget
Income				
4000 · Operating Revenues - Membership				
Other Income	4,246.00			
Voluntary Dues	0.00	0.00	0.00	0.0%
4001 · Jefferson County	28,986.00	28,986.00	0.00	100.0%
4002 · Douglas County	75,510.00	75,510.00	0.00	100.0%
4004 · Town of Castle Rock	75,510.00	75,510.00	0.00	100.0%
4005 · Plum Creek Wastewater	2,400.00	2,400.00	0.00	100.0%
4006 · Roxborough Park	2,400.00	2,400.00	0.00	100.0%
4007 · Castle Pines Metro District	2,400.00	2,400.00	0.00	100.0%
4008 · Perry Park W&S District	2,400.00	2,400.00	0.00	100.0%
4009 · Denver Water Department	2,400.00	2,400.00	0.00	100.0%
4010 · City of Littleton	2,400.00	2,400.00	0.00	100.0%
4011 · Centennial W&S District	2,400.00	2,400.00	0.00	100.0%
4012 · Town of Larkspur	2,400.00	2,400.00	0.00	100.0%
4014 · Louviers Water & San. District	2,400.00	2,400.00	0.00	100.0%
4016 · Sacred Heart Retreat House	2,000.00	2,400.00	-400.00	83.33%
4017 · Ponderosa Center	0.00	0.00	0.00	0.0%
4019 · Dominion W&S District	2,400.00	2,400.00	0.00	100.0%
4038 · Denver Water- In Kind	17,000.00	25,500.00	-8,500.00	66.67%
4039 · Plum Creek - In Kind	13,333.36	20,000.00	-6,666.64	66.67%
4040 · Centennial - In Kind	15,630.64	23,446.00	-7,815.36	66.67%
4045 · Roxborough In Kind	2,133.36	3,200.00	-1,066.64	66.67%
Total 4000 · Operating Revenues - Membership	258,349.36	278,552.00	-20,202.64	92.75%
4103 · Interest Income	65.20			
Total Income	258,414.56	278,552.00	-20,137.44	92.77%
Expense				
5000 · Expenditures - Operational				
5001 · Management Fees Technical	61,942.86	87,100.00	-25,157.14	71.12%
5002 · Management Fees- Authority	17,820.00	36,050.00	-18,230.00	49.43%
5003 · Website Hosting/Maint	2,848.00	6,906.00	-4,058.00	41.24%
5004 · NPS projects and Consultants	10,000.00	62,713.00	-52,713.00	15.95%
5005 · Legal - Admin	45,828.51	84,240.00	-38,411.49	54.4%
5006 · Misc. Admin.	0.00	515.00	-515.00	0.0%
5007 · Professional Fees-Financial	6,000.00	9,750.00	-3,750.00	61.54%
5009 · Legal Admin	0.00	0.00	0.00	0.0%
Total 5000 · Expenditures - Operational	144,439.37	287,274.00	-142,834.63	50.28%
5100 · Expenditures - Contractual				
5103 · Monitoring	0.00	5,150.00	-5,150.00	0.0%
5111 · Monitoring- in Kind	48,097.36	72,146.00	-24,048.64	66.67%
5115 · Public Outreach Consultants	0.00	0.00	0.00	0.0%
5117 · Public Outreach Sponsorships	450.00	515.00	-65.00	87.38%
Total 5100 · Expenditures - Contractual	48,547.36	77,811.00	-29,263.64	62.39%
Total Expense	192,986.73	365,085.00	-172,098.27	52.86%
Net Income	65,427.83	-86,533.00	151,960.83	-75.61%

**Chatfield Watershed Authority
Transaction Detail By Account**

August 2022

Type	Date	Num	Adj	Name	Memo	Class	Clr	Split	Debit	Credit	Balance
4000 - Operating Revenues - Membership											
4038 - Denver Water- In Kind											
General Journal	08/21/2022	Ted-Aj...	*					5111 - Monitorin...		2,125.00	2,125.00
Total 4038 - Denver Water- In Kind									0.00	2,125.00	2,125.00
4039 - Plum Creek - In Kind											
General Journal	08/08/2022	Ted-Aj...	*					5111 - Monitorin...		1,666.67	1,666.67
Total 4039 - Plum Creek - In Kind									0.00	1,666.67	1,666.67
4040 - Centennial - In Kind											
General Journal	08/08/2022	Ted-Aj...	*							1,953.83	1,953.83
Total 4040 - Centennial - In Kind									0.00	1,953.83	1,953.83
4045 - Roxborough In Kind											
General Journal	08/16/2022	Ted-Aj...	*					5111 - Monitorin...		266.67	266.67
Total 4045 - Roxborough In Kind									0.00	266.67	266.67
Total 4000 - Operating Revenues - Membership									0.00	6,012.17	6,012.17
4103 - Interest Income											
Deposit	08/31/2022				Interest			1000 - 1st Bank		18.76	18.76
Total 4103 - Interest Income									0.00	18.76	18.76
5000 - Expenditures - Operational											
5001 - Management Fees Technical											
Bill	08/31/2022			RESPEC	July 2022 CWA			2000 - Accounts ...	9,280.00		-9,280.00
Total 5001 - Management Fees Technical									9,280.00	0.00	-9,280.00
5002 - Management Fees- Authority											
Bill	08/15/2022	2022 2Q		Colorado Watershed A...	CWA Chatfield ...			2000 - Accounts ...	8,370.00		-8,370.00
Total 5002 - Management Fees- Authority									8,370.00	0.00	-8,370.00
5005 - Legal - Admin											
Bill	08/31/2022	3014848		Sornach Simmons & D...	Legal			2000 - Accounts ...	1,573.00		-1,573.00
Bill	08/31/2022	3014849		Sornach Simmons & D...	Legal			2000 - Accounts ...	128.00		-1,699.00
Bill	08/31/2022	3014850		Sornach Simmons & D...	Legal			2000 - Accounts ...	78.00		-1,777.00
Bill	08/31/2022	3014851		Sornach Simmons & D...	Legal			2000 - Accounts ...	11,865.00		-13,642.00
Total 5005 - Legal - Admin									13,642.00	0.00	-13,642.00
5007 - Professional Fees-Financial											
Bill	08/31/2022	21990		TWS Financial Inc.	August 2022			2000 - Accounts ...	750.00		-750.00
Total 5007 - Professional Fees-Financial									750.00	0.00	-750.00
Total 5000 - Expenditures - Operational									32,042.00	0.00	-32,042.00
5100 - Expenditures - Contractual											
5111 - Monitoring- in Kind											
General Journal	08/08/2022	Ted-Aj...	*						1,953.83		-1,953.83
General Journal	08/08/2022	Ted-Aj...	*					4039 - Plum Cre...	1,888.87		-3,820.50
General Journal	08/16/2022	Ted-Aj...	*					4045 - Roxbrou...	286.67		-3,887.17
General Journal	08/21/2022	Ted-Aj...	*					4038 - Denver ...	2,125.00		-6,012.17
Total 5111 - Monitoring- in Kind									6,012.17	0.00	-6,012.17
Total 5100 - Expenditures - Contractual									6,012.17	0.00	-6,012.17
TOTAL									38,054.17	6,030.93	-32,023.24



FIRSTBANK
 PO BOX 150097
 LAKEWOOD CO 80215-0097

24-Hour Customer Service: 1-800-964-3444
 New Account or Loan: 1-877-933-9800
 www.efirstbank.com

6500 0100 OO RP 31 09012022 NNNNNN 01 002336 0005
 CHATFIELD WATERSHED AUTHORITY
 C/O TWS FINANCIAL INC
 7345 S PIERCE ST STE 205
 LITTLETON CO 80128-4592

ACCOUNT NUMBER	XXX-XXX-1336
STATEMENT DATE	8-31-2022
INTEREST EARNED THIS YEAR	65.20



ACCOUNT SUMMARY -- MONEY MARKET CHECKING ACCOUNT - SAFEKEEPING \$5,000 MINIMUM

CLOSING BALANCE FROM PREVIOUS STATEMENT	DATE:	7-29-2022	428,441.35
1 DEPOSITS AND OTHER ADDITIONS TOTALING			18.76+
4 CHECKS AND OTHER WITHDRAWALS TOTALING			17,362.88-
CLOSING BALANCE FOR THIS STATEMENT	DATE:	8-31-2022	411,097.23
MINIMUM BALANCE OF	411,078.47	ON	8-16-2022
NUMBER OF DAYS IN PERIOD			33
INTEREST EARNED			18.76

CHECKS AND OTHER WITHDRAWALS * SHOWS BREAK IN CHECK NUMBER # SHOWS NOT MACHINE READABLE

CHECK#.....	AMOUNT....	DATE	CHECK#.....	AMOUNT....	DATE	CHECK#.....	AMOUNT....	DATE
5733	5,764.04	8-04	5736	5,000.00	8-11	5737	1,537.50	8-16
5735*	5,061.34	8-01						

DEPOSITS AND OTHER ADDITIONS

DATE.....	TYPE.....	AMOUNT	DATE.....	TYPE.....	AMOUNT	DATE.....	TYPE.....	AMOUNT
8-31	INTEREST	18.76						

DAILY BALANCE SUMMARY

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
8-01	423,380.01	8-11	412,615.97	8-31	411,097.23
8-04	417,615.97	8-16	411,078.47		

RATE DISCLOSURE -- RATE BASED ON AVERAGE COLLECTED BALANCE

EFFECTIVE DATES	\$500 UP TO \$20,000 RATE	\$20,000 AND ABOVE RATE
7/30 THROUGH 8/31	0.03%	0.05%

EARNINGS AND ACTIVITY CHARGE SUMMARY

INTEREST PAID CALCULATION				
DATES	AVERAGE COLLECTED BALANCE	RATE	INTEREST EARNED	
7/30 THROUGH 8/31	414,868	.050%	18.76	
TOTAL INTEREST FOR 33 DAYS			18.76	
ACTIVITY CHARGES (FIRST 150 ITEMS FREE)				
NUMBER	DESCRIPTION	COST	CHARGE	
4	DEBITS	.50	2.00	WAIVED
TOTAL ACTIVITY CHARGES			.00	

Attachment 27

RESOLUTION FOR EXEMPTION FROM AUDIT

A RESOLUTION APPROVING AN EXEMPTION FROM AUDIT FOR FISCAL YEAR 2021 FOR CHATFIELD WATERSHED AUTHORITY.

WHEREAS, the Board of Directors of Chatfield Watershed Authority wishes to claim exemption from the audit requirement of Section 29-1-603, C.R.S.; and

WHEREAS, Section 29-1-604, C.R.S. states that any local government where neither revenues nor expenditures exceed seven hundred and fifty thousand dollars may, with the approval of the state auditor, be exempt from the provisions of Section 9-1-603, C.R.S; and

WHEREAS, neither revenues nor expenditures for the Chatfield Watershed Authority exceeded \$750,000 for fiscal year 2021 and

WHEREAS, an application for exemption from audit for the Chatfield Watershed Authority has been prepared by Ted W. Snailum Jr., CPA, an independent individual with the knowledge of government accounting; and

WHEREAS, said application for exemption from audit has been completed in accordance with regulations issued by the state auditor.

NOW THEREFORE, be it resolved by the Board of Directors of Chatfield Watershed Authority that the application for exemption from the audit for the Chatfield Watershed Authority for the fiscal year ended December 31, 2021, has been reviewed and is hereby approved by a majority of the Board of Directors of Chatfield Watershed Authority; that those members of the Board of Directors of Chatfield Watershed Authority have signified their approval by signing below; and that this resolution shall be attached to, and shall become part of the application for Exemption From Audit, for Chatfield Watershed Authority, for the fiscal year ending December 31st, 2021.

ADOPTED THIS 21st day of September 2022

A handwritten signature in cursive script, appearing to read "Lou L. Thompson", written over a horizontal line.

Board Chairman

Attachment 28

APPLICATION FOR EXEMPTION FROM AUDIT

LONG FORM

FOR LOCAL GOVERNMENTS WITH EITHER REVENUES OR EXPENDITURES **MORE THAN \$100,000 BUT NOT MORE THAN \$750,000**

Under the Local Government Audit Law (Section 29-1-601, et seq., C.R.S.) any local government may apply for an exemption from audit if neither revenues nor expenditures exceed \$750,000 for the year.

If your local government has either revenues or expenditures of LESS than \$100,000, use the SHORT FORM.

EXEMPTIONS FROM AUDIT ARE NOT AUTOMATIC

To qualify for exemption from audit, a local government must complete an Application for Exemption from Audit EACH YEAR and submit it to the Office of the State Auditor (OSA) for approval.

Any preparer of an Application for Exemption from Audit must be an independent accountant with knowledge of governmental accounting.

Approval for an exemption from audit is granted only upon the review by the OSA.

READ ALL INSTRUCTIONS BEFORE COMPLETING AND SUBMITTING THIS FORM

ALL APPLICATIONS MUST BE FILED WITH THE OSA WITHIN 3 MONTHS AFTER THE ACCOUNTING YEAR-END. FOR EXAMPLE, APPLICATIONS MUST BE RECEIVED BY THE OSA ON OR BEFORE MARCH 31 FOR GOVERNMENTS WITH A DECEMBER 31 YEAR-END.

GOVERNMENTAL ACTIVITY SHOULD BE REPORTED ON THE MODIFIED ACCRUAL BASIS

PROPRIETARY ACTIVITY SHOULD BE REPORTED ON A BUDGETARY BASIS

POSTMARK DATES WILL NOT BE ACCEPTED AS PROOF OF SUBMISSION ON OR BEFORE THE STATUTORY DEADLINE

PRIOR YEAR FORMS ARE OBSOLETE AND WILL NOT BE ACCEPTED.

FOR YOUR REFERENCE, COLORADO REVISED STATUTES CAN BE FOUND AT THIS ADDRESS:

APPLICATIONS SUBMITTED ON FORMS OTHER THAN THOSE PRESCRIBED BY THE OSA WILL NOT BE ACCEPTED.

<http://www.lexisnexis.com/hottopics/Colorado/>

APPLICATIONS MUST BE FULLY AND ACCURATELY COMPLETED.

CHECKLIST

- Has the preparer signed the application?
- Has the entity corrected all Prior Year Deficiencies as communicated by the OSA?
- Has the application been PERSONALLY reviewed and approved by the governing body?
- Are all sections of the form complete, including responses to all of the questions?
- Did you include any relevant explanations for unusual items in the appropriate spaces at the end of each section?
- Will this application be submitted electronically?
 - If yes, have you read and understand the new Electronic Signature Policy? See new [here](#) policy
 - or--
 - Have you included a resolution?
 - Does the resolution state that the governing body PERSONALLY reviewed and approved the resolution in an open public meeting?
 - Has the resolution been signed by a MAJORITY of the governing body? (See sample resolution.)
- Will this application be submitted via a mail service? (e.g. US Post Office, FedEx, UPS, courier.)
 - If yes, does the application include ORIGINAL INK SIGNATURES from the MAJORITY of the governing body?

Checkout our new [web portal](#). Register your account and submit electronic Applications for Exemption From Audit, Extension of Time to File requests, Audited Financial Statements, and more! See the link below.

[OSA LG Web Portal](#)

FILING METHODS

NEW METHOD!

WEB PORTAL: Register and submit your Applications at our new portal: <https://apps.leg.co.gov/osa/lg>

MAIL: Office of the State Auditor
Local Government Audit Division
1525 Sherman St., 7th Floor
Denver, CO 80203

QUESTIONS? Email: osa.lg@state.co.us or Phone: 303-869-3000

IMPORTANT!

All Applications for Exemption from Audit are subject to review and approval by the Office of the State Auditor.

Governmental Activity should be reported on the Modified Accrual Basis

Proprietary Activity should be reported on the Cash or Budgetary Basis -- A Budget to GAAP reconciliation is provided in Part 3

Failure to file an application or denial of the request could cause the local government to lose its exemption from audit for that year and the ensuing year.

In that event, AN AUDIT SHALL BE REQUIRED.

APPLICATION FOR EXEMPTION FROM AUDIT

LONG FORM

NAME OF GOVERNMENT
ADDRESS

CHATFIELD WATERSHED AUTHORITY
TED SNAILUM JR CPA
303 933-4207
TSNAILUM@TWS-CPA.COM
303 972-0946

For the Year Ended
12/31/2021
or fiscal year ended:

CONTACT PERSON
PHONE
EMAIL
FAX

CERTIFICATION OF PREPARER

I certify that I am an independent accountant with knowledge of governmental accounting and that the information in the Application is complete and accurate to the best of my knowledge. I am aware that the Audit Law requires that a person independent of the entity complete the application if revenues or expenditure are at least \$100,000 but not more than \$750,000, and that independent means someone who is separate from the entity.

NAME:	TED SNAILUM JR CPA
TITLE	CPA
FIRM NAME (if applicable)	TWS FINANCIAL
ADDRESS	6901 S. PIERCE ST. #200
PHONE	303 933-4207
DATE PREPARED	4/20/2022
RELATIONSHIP TO ENTITY	ACCOUNTANT

PREPARER (SIGNATURE REQUIRED)

Has the entity filed for, or has the district filed, a Title 32, Article 1 Special District Notice of Inactive Status during the year? [Applicable to Title 32 special districts only, pursuant to Sections 32-1-103 (9.3) and 32-1-104 (3), C.R.S.]

YES	NO	If Yes, date filed:
<input type="checkbox"/>	<input checked="" type="checkbox"/>	

PART 1 - FINANCIAL STATEMENTS - BALANCE SHEET

* Indicate Name of Fund

NOTE: Attach additional sheets as necessary.

Line #	Description	Governmental Funds		Description	Proprietary/Fiduciary Funds	
		Fund*	Fund*		Fund*	Fund*
Assets				Assets		
1-1	Cash & Cash Equivalents	\$ 316,988	\$ -	Cash & Cash Equivalents	\$ -	\$ -
1-2	Investments	\$ -	\$ -	Investments	\$ -	\$ -
1-3	Receivables	\$ -	\$ -	Receivables	\$ -	\$ -
1-4	Due from Other Entities or Funds	\$ -	\$ -	Due from Other Entities or Funds	\$ -	\$ -
1-5	Property Tax Receivable	\$ -	\$ -	Other Current Assets [specify...]	\$ -	\$ -
	All Other Assets [specify...]	\$ -	\$ -		\$ -	\$ -
1-6		\$ -	\$ -		\$ -	\$ -
1-7		\$ -	\$ -	Capital Assets, net (from Part 6-4)	\$ -	\$ -
1-8		\$ -	\$ -	Other Long Term Assets [specify...]	\$ -	\$ -
1-9		\$ -	\$ -		\$ -	\$ -
1-10		\$ -	\$ -		\$ -	\$ -
1-11	(add lines 1-1 through 1-10) TOTAL ASSETS	\$ 316,988	\$ -	(add lines 1-1 through 1-10) TOTAL ASSETS	\$ -	\$ -
Deferred Outflows of Resources				Deferred Outflows of Resources		
1-12	[specify...]	\$ -	\$ -	[specify...]	\$ -	\$ -
1-13	[specify...]	\$ -	\$ -	[specify...]	\$ -	\$ -
1-14	(add lines 1-12 through 1-13) TOTAL DEFERRED OUTFLOWS	\$ -	\$ -	(add lines 1-12 through 1-13) TOTAL DEFERRED OUTFLOWS	\$ -	\$ -
1-15	TOTAL ASSETS AND DEFERRED OUTFLOWS	\$ 316,988	\$ -	TOTAL ASSETS AND DEFERRED OUTFLOWS	\$ -	\$ -
Liabilities				Liabilities		
1-16	Accounts Payable	\$ 14,969	\$ -	Accounts Payable	\$ -	\$ -
1-17	Accrued Payroll and Related Liabilities	\$ -	\$ -	Accrued Payroll and Related Liabilities	\$ -	\$ -
1-18	Unearned Property Tax Revenue	\$ -	\$ -	Accrued Interest Payable	\$ -	\$ -
1-19	Due to Other Entities or Funds	\$ -	\$ -	Due to Other Entities or Funds	\$ -	\$ -
1-20	All Other Current Liabilities	\$ -	\$ -	All Other Current Liabilities	\$ -	\$ -
1-21	(add lines 1-16 through 1-20) TOTAL CURRENT LIABILITIES	\$ 14,969	\$ -	(add lines 1-16 through 1-20) TOTAL CURRENT LIABILITIES	\$ -	\$ -
1-22	All Other Liabilities [specify...]	\$ -	\$ -	Proprietary Debt Outstanding (from Part 4-4)	\$ -	\$ -
1-23		\$ -	\$ -	Other Liabilities [specify...]:	\$ -	\$ -
1-24		\$ -	\$ -		\$ -	\$ -
1-25		\$ -	\$ -		\$ -	\$ -
1-26		\$ -	\$ -		\$ -	\$ -
1-27	(add lines 1-21 through 1-26) TOTAL LIABILITIES	\$ 14,969	\$ -	(add lines 1-21 through 1-26) TOTAL LIABILITIES	\$ -	\$ -
Deferred Inflows of Resources				Deferred Inflows of Resources		
1-28	Deferred Property Taxes	\$ -	\$ -	Pension Related	\$ -	\$ -
1-29	Other [specify...]	\$ -	\$ -	Other [specify...]	\$ -	\$ -
1-30	(add lines 1-28 through 1-29) TOTAL DEFERRED INFLOWS	\$ -	\$ -	(add lines 1-28 through 1-29) TOTAL DEFERRED INFLOWS	\$ -	\$ -
Fund Balance				Net Position		
1-31	Nonspendable Prepaid	\$ -	\$ -	Net Investment in Capital Assets	\$ -	\$ -
1-32	Nonspendable Inventory	\$ -	\$ -		\$ -	\$ -
1-33	Restricted [specify...]	\$ -	\$ -	Emergency Reserves	\$ -	\$ -
1-34	Committed [specify...]	\$ -	\$ -	Other Designations/Reserves	\$ -	\$ -
1-35	Assigned [specify...]	\$ -	\$ -	Restricted	\$ -	\$ -
1-36	Unassigned:	\$ 302,019	\$ -	Undesignated/Unreserved/Unrestricted	\$ -	\$ -
1-37	Add lines 1-31 through 1-36 This total should be the same as line 3-33 TOTAL FUND BALANCE	\$ 302,019	\$ -	Add lines 1-31 through 1-36 This total should be the same as line 3-33 TOTAL NET POSITION	\$ -	\$ -
1-38	Add lines 1-27, 1-30 and 1-37 This total should be the same as line 1-15 TOTAL LIABILITIES, DEFERRED INFLOWS, AND FUND BALANCE	\$ 316,988	\$ -	Add lines 1-27, 1-30 and 1-37 This total should be the same as line 1-15 TOTAL LIABILITIES, DEFERRED INFLOWS, AND NET POSITION	\$ -	\$ -

Please use this space to provide explanation of any items on this page

PART 2 - FINANCIAL STATEMENTS - OPERATING STATEMENT - REVENUES

Line #	Description	Governmental Funds		Description	Proprietary/Fiduciary Funds		Please use this space to provide explanation of any items on this page
		Fund*	Fund*		Fund*	Fund*	
Tax Revenue				Tax Revenue			
2-1	Property [include mills levied in Question 10-6]	\$ -	\$ -	Property [include mills levied in Question 10-6]	\$ -	\$ -	
2-2	Specific Ownership	\$ -	\$ -	Specific Ownership	\$ -	\$ -	
2-3	Sales and Use Tax	\$ -	\$ -	Sales and Use Tax	\$ -	\$ -	
2-4	Other Tax Revenue [specify...]:	\$ -	\$ -	Other Tax Revenue [specify...]:	\$ -	\$ -	
2-5		\$ -	\$ -		\$ -	\$ -	
2-6		\$ -	\$ -		\$ -	\$ -	
2-7		\$ -	\$ -		\$ -	\$ -	
2-8	Add lines 2-1 through 2-7 TOTAL TAX REVENUE	\$ -	\$ -	Add lines 2-1 through 2-7 TOTAL TAX REVENUE	\$ -	\$ -	
2-9	Licenses and Permits	\$ -	\$ -	Licenses and Permits	\$ -	\$ -	
2-10	Highway Users Tax Funds (HUTF)	\$ -	\$ -	Highway Users Tax Funds (HUTF)	\$ -	\$ -	
2-11	Conservation Trust Funds (Lottery)	\$ -	\$ -	Conservation Trust Funds (Lottery)	\$ -	\$ -	
2-12	Community Development Block Grant	\$ -	\$ -	Community Development Block Grant	\$ -	\$ -	
2-13	Fire & Police Pension	\$ -	\$ -	Fire & Police Pension	\$ -	\$ -	
2-14	Grants	\$ -	\$ -	Grants	\$ -	\$ -	
2-15	Donations	\$ -	\$ -	Donations	\$ -	\$ -	
2-16	Charges for Sales and Services	\$ -	\$ -	Charges for Sales and Services	\$ -	\$ -	
2-17	Rental Income	\$ -	\$ -	Rental Income	\$ -	\$ -	
2-18	Fines and Forfeits	\$ -	\$ -	Fines and Forfeits	\$ -	\$ -	
2-19	Interest/Investment Income	\$ 39	\$ -	Interest/Investment Income	\$ -	\$ -	
2-20	Tap Fees	\$ -	\$ -	Tap Fees	\$ -	\$ -	
2-21	Proceeds from Sale of Capital Assets	\$ -	\$ -	Proceeds from Sale of Capital Assets	\$ -	\$ -	
2-22	All Other [specify...]:	\$ -	\$ -	All Other [specify...]:	\$ -	\$ -	
2-23	membership dues	\$ 256,156	\$ -		\$ -	\$ -	
2-24	Add lines 2-8 through 2-23 TOTAL REVENUES	\$ 256,195	\$ -	Add lines 2-8 through 2-23 TOTAL REVENUES	\$ -	\$ -	
Other Financing Sources				Other Financing Sources			
2-25	Debt Proceeds	\$ -	\$ -	Debt Proceeds	\$ -	\$ -	
2-26	Developer Advances	\$ -	\$ -	Developer Advances	\$ -	\$ -	
2-27	Other [specify...]:	\$ -	\$ -	Other [specify...]:	\$ -	\$ -	
2-28	Add lines 2-25 through 2-27 TOTAL OTHER FINANCING SOURCES	\$ -	\$ -	Add lines 2-25 through 2-27 TOTAL OTHER FINANCING SOURCES	\$ -	\$ -	
2-29	Add lines 2-24 and 2-28 TOTAL REVENUES AND OTHER FINANCING SOURCES	\$ 256,195	\$ -	Add lines 2-24 and 2-28 TOTAL REVENUES AND OTHER FINANCING SOURCES	\$ -	\$ -	GRAND TOTALS
							\$ 256,195

IF GRAND TOTAL REVENUES AND OTHER FINANCING SOURCES for all funds (Line 2-29) are GREATER than \$750,000 - STOP. You may not use this form. An audit may be required. See Section 29-1-604, C.R.S., or contact the OSA Local Government Division at (303) 869-3000 for assistance.

PART 3 - FINANCIAL STATEMENTS - OPERATING STATEMENT - EXPENDITURES/EXPENSES

Line #	Description	Governmental Funds		Description	Proprietary/Fiduciary Funds		Please use this space to provide explanation of any items on this page
		Fund*	Fund*		Fund*	Fund*	
Expenditures				Expenses			
3-1	General Government	\$ 250,982	\$ -	General Operating & Administrative	\$ -	\$ -	
3-2	Judicial	\$ -	\$ -	Salaries	\$ -	\$ -	
3-3	Law Enforcement	\$ -	\$ -	Payroll Taxes	\$ -	\$ -	
3-4	Fire	\$ -	\$ -	Contract Services	\$ -	\$ -	
3-5	Highways & Streets	\$ -	\$ -	Employee Benefits	\$ -	\$ -	
3-6	Solid Waste	\$ -	\$ -	Insurance	\$ -	\$ -	
3-7	Contributions to Fire & Police Pension Assoc.	\$ -	\$ -	Accounting and Legal Fees	\$ -	\$ -	
3-8	Health	\$ -	\$ -	Repair and Maintenance	\$ -	\$ -	
3-9	Culture and Recreation	\$ -	\$ -	Supplies	\$ -	\$ -	
3-10	Transfers to other districts	\$ -	\$ -	Utilities	\$ -	\$ -	
3-11	Other [specify...]:	\$ -	\$ -	Contributions to Fire & Police Pension Assoc.	\$ -	\$ -	
3-12		\$ -	\$ -	Other [specify...]	\$ -	\$ -	
3-13		\$ -	\$ -		\$ -	\$ -	
3-14	Capital Outlay	\$ -	\$ -	Capital Outlay	\$ -	\$ -	
	Debt Service			Debt Service			
3-15	Principal (should match amount in 4-4)	\$ -	\$ -	Principal (should match amount in 4-4)	\$ -	\$ -	
3-16	Interest	\$ -	\$ -	Interest	\$ -	\$ -	
3-17	Bond Issuance Costs	\$ -	\$ -	Bond Issuance Costs	\$ -	\$ -	
3-18	Developer Principal Repayments	\$ -	\$ -	Developer Principal Repayments	\$ -	\$ -	
3-19	Developer Interest Repayments	\$ -	\$ -	Developer Interest Repayments	\$ -	\$ -	
3-20	All Other [specify...]:	\$ -	\$ -	All Other [specify...]:	\$ -	\$ -	
3-21		\$ -	\$ -		\$ -	\$ -	
3-22	Add lines 3-1 through 3-21	\$ 250,982	\$ -	Add lines 3-1 through 3-21	\$ -	\$ -	
	TOTAL EXPENDITURES			TOTAL EXPENSES			GRAND TOTAL
3-23	Interfund Transfers (In)	\$ -	\$ -	Net Interfund Transfers (In) Out	\$ -	\$ -	\$ 250,982
3-24	Interfund Transfers Out	\$ -	\$ -	Other [specify...][enter negative for expense]	\$ -	\$ -	
3-25	Other Expenditures (Revenues):	\$ -	\$ -	Depreciation	\$ -	\$ -	
3-26		\$ -	\$ -	Other Financing Sources (Uses) (from line 2-28)	\$ -	\$ -	
3-27		\$ -	\$ -	Capital Outlay (from line 3-14)	\$ -	\$ -	
3-28		\$ -	\$ -	Debt Principal (from line 3-15, 3-18)	\$ -	\$ -	
3-29	(Add lines 3-23 through 3-28)			(Line 3-27, plus line 3-28, less line 3-26, less line 3-25, plus line 3-24) TOTAL GAAP RECONCILING ITEMS	\$ -	\$ -	
	TOTAL TRANSFERS AND OTHER EXPENDITURES	\$ -	\$ -				
3-30	Excess (Deficiency) of Revenues and Other Financing Sources Over (Under) Expenditures Line 2-29, less line 3-22, less line 3-29	\$ 5,213	\$ -	Net Increase (Decrease) in Net Position Line 2-29, less line 3-22, plus line 3-29, less line 3-23	\$ -	\$ -	
3-31	Fund Balance, January 1 from December 31 prior year report	\$ 296,806	\$ -	Net Position, January 1 from December 31 prior year report	\$ -	\$ -	
3-32	Prior Period Adjustment (MUST explain)	\$ -	\$ -	Prior Period Adjustment (MUST explain)	\$ -	\$ -	
3-33	Fund Balance, December 31			Net Position, December 31			
	Sum of Lines 3-30, 3-31, and 3-32			Sum of Lines 3-30, 3-31, and 3-32			
	This total should be the same as line 1-37.	\$ 302,019	\$ -	This total should be the same as line 1-37.	\$ -	\$ -	

IF GRAND TOTAL EXPENDITURES for all funds (Line 3-22) are GREATER than \$750,000 - STOP. You may not use this form. An audit may be required. See Section 29-1-604, C.R.S., or contact the OSA Local Government Division at (303) 869-3000 for assistance.

PART 4 - DEBT OUTSTANDING, ISSUED, AND RETIRED

Please answer the following questions by marking the appropriate boxes.

YES NO

Please use this space to provide any explanations or comments:

4-1 Does the entity have outstanding debt? YES NO

4-2 Is the debt repayment schedule attached? If no, MUST explain: YES NO

4-3 Is the entity current in its debt service payments? If no, MUST explain: YES NO

4-4 Please complete the following debt schedule, if applicable: (please only include principal amounts)

	Outstanding at beginning of year*	Issued during year	Retired during year	Outstanding at year-end
General obligation bonds	\$ -	\$ -	\$ -	\$ -
Revenue bonds	\$ -	\$ -	\$ -	\$ -
Notes/Loans	\$ -	\$ -	\$ -	\$ -
Leases	\$ -	\$ -	\$ -	\$ -
Developer Advances	\$ -	\$ -	\$ -	\$ -
Other (specify):	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

*must agree to prior year ending balance

Please answer the following questions by marking the appropriate boxes.

YES NO

4-5 Does the entity have any authorized, but unissued, debt [Section 29-1-605(2) C.R.S.]? YES NO

If yes: How much? \$ -

Date the debt was authorized: _____

4-6 Does the entity intend to issue debt within the next calendar year? YES NO

If yes: How much? \$ -

4-7 Does the entity have debt that has been refinanced that it is still responsible for? YES NO

If yes: What is the amount outstanding? \$ -

4-8 Does the entity have any lease agreements? YES NO

If yes: What is being leased? _____

What is the original date of the lease? _____

Number of years of lease? _____

Is the lease subject to annual appropriation? YES NO

What are the annual lease payments? \$ -

PART 5 - CASH AND INVESTMENTS

Please provide the entity's cash deposit and investment balances.

AMOUNT TOTAL

Please use this space to provide any explanations or comments:

5-1	YEAR-END Total of ALL Checking and Savings accounts	\$ 316,987	
5-2	Certificates of deposit	\$ -	
TOTAL CASH DEPOSITS		\$	316,987
Investments (if investment is a mutual fund, please list underlying investments):			
5-3		\$ -	
		\$ -	
		\$ -	
		\$ -	
TOTAL INVESTMENTS		\$	-
TOTAL CASH AND INVESTMENTS		\$	316,987

Please answer the following question by marking in the appropriate box

YES NO N/A

5-4 Are the entity's investments legal in accordance with Section 24-75-601, et. seq., C.R.S.? YES NO N/A

5-5 Are the entity's deposits in an eligible (Public Deposit Protection Act) public depository (Section 11-10.5-101, et seq. C.R.S.)? If no, MUST explain: YES NO N/A

PART 6 - CAPITAL ASSETS

Please answer the following question by marking in the appropriate box

YES NO

Please use this space to provide any explanations or comments:

- 6-1 Does the entity have capitalized assets? YES NO
- 6-2 Has the entity performed an annual inventory of capital assets in accordance with Section 29-1-506, C.R.S.? If no, YES NO

MUST explain:

6-3 Complete the following Capital Assets table for GOVERNMENTAL FUNDS:

	Balance - beginning of the year ¹	Additions ²	Deletions	Year-End Balance
Land	\$ -	\$ -	\$ -	\$ -
Buildings	\$ -	\$ -	\$ -	\$ -
Machinery and equipment	\$ -	\$ -	\$ -	\$ -
Furniture and fixtures	\$ -	\$ -	\$ -	\$ -
Infrastructure	\$ -	\$ -	\$ -	\$ -
Construction In Progress (CIP)	\$ -	\$ -	\$ -	\$ -
Other (explain):	\$ -	\$ -	\$ -	\$ -
Accumulated Depreciation (Enter a negative, or credit, balance)	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

6-4 Complete the following Capital Assets table for PROPRIETARY FUNDS:

	Balance - beginning of the year [*]	Additions	Deletions	Year-End Balance
Land	\$ -	\$ -	\$ -	\$ -
Buildings	\$ -	\$ -	\$ -	\$ -
Machinery and equipment	\$ -	\$ -	\$ -	\$ -
Furniture and fixtures	\$ -	\$ -	\$ -	\$ -
Infrastructure	\$ -	\$ -	\$ -	\$ -
Construction In Progress (CIP)	\$ -	\$ -	\$ -	\$ -
Other (explain):	\$ -	\$ -	\$ -	\$ -
Accumulated Depreciation (Enter a negative, or credit, balance)	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ -	\$ -	\$ -

* Must agree to prior year-end balance
- Generally capital asset additions should be reported at capital outlay on line 3-14 and capitalized in accordance with the government's capitalization policy. Please explain any discrepancy

PART 7 - PENSION INFORMATION

YES NO

Please use this space to provide any explanations or comments:

- 7-1 Does the entity have an "old hire" firefighters' pension plan? YES NO
- 7-2 Does the entity have a volunteer firefighters' pension plan? YES NO
- If yes: Who administers the plan? YES NO

Indicate the contributions from:

Tax (property, SO, sales, etc.):		\$ -
State contribution amount:		\$ -
Other (gifts, donations, etc.):		\$ -
TOTAL		\$ -

What is the monthly benefit paid for 20 years of service per retiree as of Jan 1? \$ -

PART 8 - BUDGET INFORMATION

Please answer the following question by marking in the appropriate box

		YES	NO	N/A
8-1	Did the entity file a current year budget with the Department of Local Affairs, in accordance with Section 29-1-113 C.R.S.? If no, MUST explain:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8-2	Did the entity pass an appropriations resolution in accordance with Section 29-1-108 C.R.S.? If no, MUST explain:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please use this space to provide any explanations or comments:

If yes: Please indicate the amount appropriated for each fund separately for the year reported

Governmental/Proprietary Fund Name	Total Appropriations By Fund
General	\$ 287,746
	\$ -
	\$ -
	\$ -

PART 9 - TAX PAYER'S BILL OF RIGHTS (TABOR)

Please answer the following question by marking in the appropriate box

		YES	NO
9-1	Is the entity in compliance with all the provisions of TABOR [State Constitution, Article X, Section 20(5)]? <small>Note: An election to exempt the government from the spending limitations of TABOR does not exempt the government from the 3 percent emergency reserve requirement. All governments should determine if they meet this requirement of TABOR.</small>	<input type="checkbox"/>	<input type="checkbox"/>

Please use this space to provide any explanations or comments:

PART 10 - GENERAL INFORMATION

Please answer the following question by marking in the appropriate box

		YES	NO
10-1	Is this application for a newly formed governmental entity? If yes: Date of formation: <input style="width: 150px; height: 30px;" type="text"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10-2	Has the entity changed its name in the past or current year? If Yes: NEW name <input style="width: 400px; height: 20px;" type="text"/> PRIOR name <input style="width: 400px; height: 20px;" type="text"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10-3	Is the entity a metropolitan district?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10-4	Please indicate what services the entity provides: <input style="width: 460px; height: 20px;" type="text"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10-5	Does the entity have an agreement with another government to provide services? If yes: List the name of the other governmental entity and the services provided: <input style="width: 460px; height: 20px;" type="text"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10-6	Does the entity have a certified mill levy? If yes: Please provide the number of <u>mills</u> levied for the year reported (do not enter \$ amounts):	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Bond Redemption mills	<input style="width: 50px;" type="text"/>	0.000
	General/Other mills	<input style="width: 50px;" type="text"/>	0.000
	Total mills	<input style="width: 50px;" type="text"/>	0.000

Please use this space to provide any explanations or comments:

Please use this space to provide any additional explanations or comments not previously included:

OSA USE ONLY

Entity Wide:		General Fund		Governmental Funds		Notes
Unrestricted Cash & Investments	\$ 316,987	Unrestricted Fund Balan	\$ 302,019	Total Tax Revenue	\$ -	
Current Liabilities	\$ 14,969	Total Fund Balance	\$ 302,019	Revenue Paying Debt Service	\$ -	
Deferred Inflow	\$ -	PY Fund Balance	\$ 296,806	Total Revenue	\$ 256,195	
		Total Revenue	\$ 256,195	Total Debt Service Principal	\$ -	
		Total Expenditures	\$ 250,982	Total Debt Service Interest	\$ -	
		Interfund In	\$ -			
Governmental		Interfund Out	\$ -	Enterprise Funds		
Total Cash & Investments	\$ 316,988	Proprietary		Net Position	\$ -	
Transfers In	\$ -	- Current Assets	\$ -	- PY Net Position	\$ -	
Transfers Out	\$ -	- Deferred Outflow	\$ -	Government-Wide		
Property Tax	\$ -	- Current Liabilities	\$ -	- Total Outstanding Debt	\$ -	
Debt Service Principal	\$ -	- Deferred Inflow	\$ -	- Authorized but Unissued	\$ -	
Total Expenditures	\$ 250,982	- Cash & Investments	\$ -	- Year Authorized	\$ 1/0/1900	
Total Developer Advances	\$ -	- Principal Expense	\$ -			
Total Developer Repayments	\$ -					

PART 12 - GOVERNING BODY APPROVAL

Please answer the following question by marking in the appropriate box

12-1 If you plan to submit this form electronically, have you read the new Electronic Signature Policy?

YES	NO
<input type="checkbox"/>	<input type="checkbox"/>

Office of the State Auditor — Local Government Division - Exemption Form Electronic Signatures Policy and Procedures

Policy - Requirements

The Office of the State Auditor Local Government Audit Division may accept an electronic submission of an application for exemption from audit that includes governing board signatures obtained through a program such as DocuSign or EchoSign. Required elements and safeguards are as follows:

- The preparer of the application is responsible for obtaining board signatures that comply with the requirement in Section 29-1-604 (3), C.R.S., that states the application shall be personally reviewed, approved, and signed by a majority of the members of the governing body.
- The application must be accompanied by the signature history document created by the electronic signature software. The signature history document must show when the document was created and when the document was emailed to the various parties, and include the dates the individual board members signed the document. The signature history must also show the individuals' email addresses and IP address.
- Office of the State Auditor staff will not coordinate obtaining signatures.

The application for exemption from audit form created by our office includes a section for governing body approval. Local governing boards note their approval and submit the application through one of the following three methods:

- 1) Submit the application in hard copy via the US Mail including original signatures.
- 2) Submit the application electronically via email and either,
 - a. include a copy of an adopted resolution that documents formal approval by the Board, or
 - b. include electronic signatures obtained through a software program such as DocuSign or EchoSign in accordance with the requirements noted above.

Below is the certification and approval of the governing body. By signing, each individual member is certifying they are a duly elected or appointed officer of the local government. Governing members may be verified. Also by signing the individual member certifies that this Application for Exemption from Audit has been prepared consistent with Section 29-1-604, C.R.S., which states that a governmental agency with revenue and expenditures of \$750,000 or less must have an application prepared by an independent accountant with knowledge of governmental accounting; completed to the best of their knowledge and is accurate and true. Use additional pages if needed.

Print the names of ALL members of the governing body below.

A MAJORITY of the members of the governing body must complete and sign in the column below.

Full Name	
Lora Thomas	I, <u>LORA THOMAS</u> attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: <u>Lora Thomas</u> Date: <u>9-21-22</u> My term Expires: <u>6-14-2025</u>
Lestey Dahlkemper	I, <u>LESTEY DAHLKEMPER</u> attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: <u>Lestey Dahlkemper</u> Date: <u>9/20/22</u> My term Expires: <u>JANUARY 2023</u>
Barbara Biggs	I, <u>Barbara Biggs</u> attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: <u>Barbara Biggs</u> Date: <u>9/20/2022</u> My term Expires: _____
Alison Witheridge	I, <u>ALISON WITHERIDGE</u> attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: <u>Alison Witheridge</u> Date: <u>9/20/2022</u> My term Expires: _____
Laura Cavey	I, <u>Laura Cavey</u> attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: <u>Laura Cavey</u> Date: <u>9-20-22</u> My term Expires: <u>JANUARY 2023</u>
	I, _____ attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: _____ Date: _____ My term Expires: _____
	I, _____ attest that I am a duly elected or appointed board member, and that I have personally reviewed and approve this application for exemption from audit. Signed: _____ Date: _____ My term Expires: _____

EXAMPLE - DO NOT FILL OUT THIS PAGE

This sample resolution/ordinance for exemption from audit is provided as an example of the documentation that is required, the wording may be used as a basis for your own local government document, if needed, however you MUST draft your own ordinance or resolution making any changes where applicable. Legal counsel should be consulted regarding any questions.

RESOLUTION/ORDINANCE FOR EXEMPTION FROM AUDIT
(Pursuant to Section 29-1-604, C.R.S.)

A RESOLUTION/ORDINANCE APPROVING AN EXEMPTION FROM AUDIT FOR YEAR 20XX FOR THE (name of government), STATE OF COLORADO.

WHEREAS, the (governing body) of (name of government) wishes to claim exemption from the audit requirements of Section 29-1-603, C.R.S.; and

WHEREAS, Section 29-1-604, C.R.S., states that any local government where neither revenues nor expenditures exceed seven hundred and fifty thousand dollars may, with the approval of the State Auditor, be exempt from the provision of Section 29-1-603, C.R.S.; and

[Choose 1 or 2 below, whichever is applicable:]

(1) WHEREAS, neither revenue nor expenditures for (name of government) exceeded \$100,000 for Year 20XX; and WHEREAS, an application for exemption from audit for (name of government) has been prepared by (name of individual), a person skilled in governmental accounting; and

OR

(2) WHEREAS, neither revenues nor expenditures for (name of government) exceeded \$750,000 for Year 20XX; and WHEREAS, an application for exemption from audit for (name of government) has been prepared by (name of individual or firm), an independent accountant with knowledge of governmental accounting; and

WHEREAS, said application for exemption from audit has been completed in accordance with regulations, issued by the State Auditor.

NOW THEREFORE, be it resolved/ordained by the (governing body) of the (name of government) that the application for exemption from audit for (name of government) for the year ended _____, 20XX, has been personally reviewed and is hereby approved by a majority of the (governing body) of the (name of government); that those members of the (governing body) have signified their approval by signing below; and that this resolution shall be attached to, and shall become a part of, the application for exemption from audit of the (name of government) for the year ended _____, 20XX.

ADOPTED THIS ___ day of _____, A.D. 20XX.

Mayor/President/Chairman, etc.

ATTEST:

Town Clerk, Secretary, etc.

Type or Print Names of Members of Governing Body	Date Term Expires	Signature