

EXHIBIT U – 1041 APPLICATION SECTIONS

1041 PERMIT APPLICATION SUBMITTAL
FOR
TOWN OF RAMAH WASTEWATER SYSTEM
SEWER LIFT STATION
&
WASTEWATER TREATMENT PLANT

JULY 2022

AMENDED OCTOBER 2022

EE Job No.: 0043.0001

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RESPONSES TO CHAPTER 2, ARTICLE 3 PARAGRAPH 2.303 – SUBMISSION REQUIREMENTS OF THE COUNTY GUIDELINES**SECTION 2.303 (1) COMPLETED APPLICATION FORM**

The completed application form can be seen in Exhibit B.

SECTION 2.303 (2) ADDITIONAL REQUIRED INFORMATION

The Director may require submission of any plan, study, survey or other information, in addition to the information required by this Section, at the applicant's expense, as in the Director's judgment is necessary to enable it to review and act upon the application.

To be determined by Director.

SECTION 2.303 (3) MINERAL RIGHTS

Any application which requires compliance with § 24-65.5-101, et seq., C.R.S., (Notification to Mineral Owners of Surface Development) shall not be considered to have been submitted as complete until the applicant has provided a certification signed by the applicant confirming that the applicant or its agent has examined the records of the El Paso County Clerk and Recorder for the existence of any mineral estate owners or lessees that own less than full fee title in the property which is the subject of the application, and stating whether or not any such mineral estate owners or lessees exist. In addition, for purposes of the County convening its initial public hearing on any application involving property which mineral estate owners or lessees owning less than full fee title in the property have been certified by the applicant to exist, the application shall not be considered to have been submitted as complete until the applicant has provided an additional signed certification confirming that the applicant has, at least 30 days prior to the initial public hearing, transmitted to the County and to the affected mineral estate owners and lessees the notices required by C.R.S. §24- 65.5-101, et seq.

Based on an examination of the records of the Clerk and Recorder's Office, no mineral estate owners were found. Confirmation of this can be seen in Exhibit C.

SECTION 2.303 (4) INFORMATION DESCRIBING THE APPLICANT

2.303 (4a): *The names, addresses, including email address and fax number, organizational form, and business of the applicant and, if different, the owner of the Project.*

Owner:
Town of Ramah
113 S. Commercial Street
Ramah CO, 80832
townoframah@juno.com
719-541-2163

Applicant:

Town of Ramah
113 S. Commercial Street
Ramah CO, 80832
townoframah@juno.com
719-541-2163

Engineer:

Element Engineering, LLC
12687 West Cedar Drive, Suite 300
Lakewood, CO 80228
karld@elementengineering.net
303-518-2361

2.303 (4b): *The names, addresses and qualifications, including those areas of expertise and experience with projects directly related or similar to that proposed in the application package, of individuals who are or will be responsible for constructing and operating the Project.*

The names, addresses, and qualifications of the contractor for the construction of the project will be provided after it is determined for the project (a contractor has not been selected). Prior to selecting a contractor, CDPHE approval must be obtained. CDPHE approval cannot be obtained until the 1041 process is completed.

The Town will contract with someone who has to appropriate certification to operate the proposed lift station.

2.303 (4c): *Written authorization of the application package by the Project owner, if different than the applicant.*

The owner is the legal representative of the applicant and is who signed the application and therefore authorizes the application package as seen in Exhibit B.

2.303 (4d): *Documentation of the applicant's financial and technical capability to develop and operate the Project, including a description of the applicant's experience developing and operating similar projects.*

The Town of Ramah is financially sound, and the existing wastewater treatment facility is managed and operated by the town. The town sets budgets and rates and determines the need for improvements. The proposed improvements will present a significant change in the financial obligation of the town due to the loan the town will take on to assist in covering construction costs for the project. These costs have been considered in preliminary cost estimates. The Town of Ramah is seeking funding through the CDPHE State Revolving Loan Fund (SRF) program and a DOLA Energy/Mineral Impact Assistance Fund grant. The operations and maintenance costs associated with the proposed lift station are expected to increase slightly compared to the existing facility. The town is capable and willing to enact rate changes as necessary to support repayment for the project.

2.303 (4e): *Written qualifications of report preparers.*

The Element Engineering team has had experience with completing the 1041 process. These projects have included lift stations and water treatment plants. The team has also completed numerous other similar projects that have gone through the State of Colorado permitting process.

Nick Marcotte, P.E.
President

Nick Marcotte has over 12 years of experience providing permitting, design, and construction management services for rural towns, cities, and special districts throughout Colorado, Kansas, Wyoming, and Washington. He has specialized expertise in water and wastewater infrastructure and treatment planning, design, CDPHE permitting, hydraulics, municipal infrastructure, master planning, environmental processes, and acquisition of grants and loans to fund various projects.

Karl Duffield, E.I.T.
Project Engineer

Karl has over 5 years of experience in Civil Engineering including wastewater treatment and collection design, water treatment and distribution design, contract documents, and grant funding assistance and coordination.

The complete resumes of the report preparers are included in Exhibit D.

SECTION 2.303 (5) INFORMATION DESCRIBING THE PROJECT**2.303 (5a):** *Vicinity map showing the proposed site and the surrounding area.*

A vicinity map of the project, which shows the location of the Town of Ramah Service Area, and the project location can be seen in Exhibit E.

2.303 (5b): *Executive summary of the proposal indicating the scope and need for the Project.*

The existing Ramah wastewater treatment facility consists of one unlined, non-aerated, unpermitted retention pond that does not provide adequate treatment to discharge to groundwater. All wastewater in the collection system is directed to a septic tank that directs flow to the existing lagoon. The lagoon is neither lined nor aerated. The existing pond is not designed for evaporation, therefore, based on the analysis of the water balance, we assume the lagoon is discharging to the groundwater. The existing facility is unpermitted by CDPHE. No flow data exists as no measurement equipment has been installed.

The service area currently includes 72 units and a population of approximately 130 people based on the most recent US Census Bureau data (2019). Though some multi-family units exist in the service area, it consists primarily of single-family homes. The commercial contributors in the service area are not notable. The population of the Town of Ramah has fluctuated between 98 to 132 people over the previous 29 years of reported data from the US Census Bureau. Since 2001 the town has seen a relatively constant increase in population. An average max month flow of 85 gpd per capita was assumed for the service area per standard design conditions. Utilizing this usage rate and the existing population estimate of 132, an existing average daily flow of 11,203 gpd was determined. Using the projected population estimates, the 20-year average day flow was calculated to be approximately 12,855 gpd. In order to be conservative, the design

will be for 15,000 gpd. Project proposes to rate the new facility to an influent flow of 0.015 MGD and a permitted influent organic load of 32 lbs BOD₅/day, equivalent to an influent BOD concentration of 250 mg/L. An organic loading limit was not issued as this site is unpermitted, and influent BOD monitoring was not required for an evaporative pond facility.

A replacement of the existing plant must be constructed in order to bring the town into and maintain compliance with state discharge permit requirements. The proposed project to bring the wastewater system into compliance includes constructing an evaporation pond wastewater treatment facility that occurs beyond the existing location as the proposed system will be located on a property separate from the existing wastewater facility.

The proposed facility will include 3 ponds, each being 485' long and 258' wide at the top of the berm. Each pond will be approximately 2.85 acres, with the total pond's facility area totaling approximately 10.3 acres. The new facility will contain a new manual bar screen to screen any influent solids before entering the ponds. One 8-foot diameter influent flow structure to divert the influent into the three ponds equally. Three 12-inch diameter gravity flow pipes will divert the influent flow from the splitter structure into the three ponds. Three more 12-inch gravity pipes will be installed between the three ponds to maintain an equal flow between each pond and ensure that the water surface level in each pond does not exceed the 2-ft of freeboard.

The influent lift station to pump effluent from the collection system to the evaporative ponds will also be on separate property from the existing wastewater facility. This will be located within town right-of-way, approximately 200 feet south of the existing influent septic tank along Pikes Peak Ave. The lift station is to be contained within a 2,700 square foot area surrounded by new chain-link fence. The lift station will contain four new structures. There will be a new influent manhole that receives flow from the existing collection system from approximately 46 feet of new 8-inch gravity pipe. From the influent manhole, collections system flow is diverted to the new lift station vault via 8-inch gravity piping. The new influent lift station will be approximately 12 feet deep and contain two submersible grinder pumps. Each pump will be capable of handling the peak hour flow rate for redundancy should one pump fail or need to be removed for maintenance. The influent lift station vault will also include an emergency overflow pipe that will allow flow past a set height in the vault to flow into an underground storage. The fiberglass storage tank will be located adjacent to the new lift station and will be sized to store over two hours of peak hour flow as per standard design criteria. The tank is sized for 6,000 gallons and is to be 8-ft in diameter and approximately 18 feet in length.

Lift station effluent will leave the vault from via (2) 2-inch pipes that will enter the meter check valve vault approximately 19 feet downstream of the lift station. The 2-inch pipes will join back together into a manifold in the vault after two check valves. The new effluent flow meter will be located in the vault as well. Downstream of the meter, the effluent will leave the vault and increased to 3-inch pipe as it becomes the effluent force main to the new ponds. Approximately 4,670 feet of 3-inch force main will convey flow from the lift station to the new ponds. Two air release valve vaults are to be installed along the force main alignment at the high points.

Based on the permitted hydraulic limit of 0.015 MGD, the proposed lift station will be designed for peak hour flow, which is projected to be 0.060 MGD, or 42 gpm. It is anticipated that the lift station and evaporative ponds will be constructed from spring to fall of 2023 with an anticipated construction duration of 7 months.

2.303 (5c): *Plans and specifications of the Project in sufficient detail to evaluate the application against the applicable Review Criteria.*

The plans for the Project are included in Exhibit H. The specifications can be seen in Exhibit G.

2.303 (5d): *Descriptions of alternatives to the Project considered by the applicant. If the Director determines that the nature or extent of the proposal involves the potential for significant damage and warrants examination of other specific, less damaging alternatives, the Director may require the applicant to evaluate and present information on such additional alternatives as part of the application.*

Several alternatives were analyzed by the applicant for this Project. The first alternative was the consolidation with the closest WWTP in the area, which is in Simla, located approximately 5 miles northeast of Ramah. The costs associated with building a 5-mile pipeline would be significantly higher than the other considered alternatives and make this alternative financially infeasible. Therefore, consolidation was determined to not be a viable option.

Another considered alternative was the replacement of the existing lagoon system with a complete Mechanical Facility. Such a facility would require the decommissioning of the existing lagoon system and the complete replacement of the WWTP with a packaged wastewater facility at the existing lagoon treatment site. This alternative would include the construction/installation of an influent flume, influent lift station, sewer force main, influent screening, alkalinity feed system, packaged wastewater treatment plant, chlorine feed system & contact chamber an effluent flume & flow meter and a building for chemical and blowers. Additionally, this alternative would include any necessary biosolids removal from the existing ponds, fill material to decommission the existing ponds, electrical site work, and yard piping. This option was compared with the evaporative pond system and found to be significantly more expensive to construct and operate.

The most cost-effective option determined is the alternative for Complete Retention/Evaporative Pond System. The proposed project includes decommissioning of the existing facility and the construction of a new evaporative pond system and all associated equipment. It was determined to be the best and most feasible alternative and was the chosen project.

2.303 (5e): *Schedules for designing, permitting, constructing and operating the Project, including the estimated life of the Project.*

The proposed schedule for the Project can be seen in the table below.

Task	Start Date	End Date
Complete & Submit 22.6 & 22.9 Site Application to CDPHE	--	Jan 2022
Complete & Submit 22.6 & 22.9 Site Application Ammendment to CDPHE, EL Paso County		Feb 2022
CDPHE Review and Approval of Site Applications	Feb 2022	Jul 2022
Complete & Submit Process Design Report, 100% Plans and Specifications to CDPHE	Jul 2022	Nov 2022
CDPHE Review and Approval of Process Design Report, 100% Plans and Specifications	Nov 2022	Feb 2023
Project Bidding	Mar 2023	Apr 2023
Construction	Apr 2023	Oct 2023

The lift station has an expected life of 20 years, but the pumps will likely need to be replaced every 10 years.

2.303 (5f): *The need for the Project, including a discussion of alternatives to the Project that were considered and rejected; existing/proposed facilities that perform the same or related function; and population projections or growth trends that form the basis of demand projections justifying the Project.*

The Town of Ramah WWTP does not currently have authorization to discharge to groundwater. The existing facility consists of an unlined lagoon that does not provide adequate treatment to discharge to groundwater. A replacement of the existing plant must be constructed in order to bring the town into and maintain compliance with state discharge permit requirements.

Alternatives considered include consolidation to neighboring treatment facilities, construction of a new mechanical facility and construction of complete retention and evaporative pond system. The “No Action” alternative was not considered. The existing facilities are incapable of treating wastewater to the permitted limits. Continued operation in this manner would result in illegal discharges and enforcement actions, and therefore is not a feasible alternative. Consolidation is not considered viable. The closest WWTP in the area is in Simla, located approximately 5 miles northeast of Ramah. The costs associated with building a 5-mile pipeline make this alternative financially infeasible. Therefore, consolidation is not a feasible alternative. A Mechanical Facility would include the decommissioning of the existing lagoon system and the complete replacement of the WWTP with a packaged wastewater facility at the existing lagoon treatment site. This alternative would include the construction/installation of an influent flume, influent lift station, sewer force main, influent screening, alkalinity feed system, packaged wastewater treatment plant, chlorine feed system & contact chamber an effluent flume & flow meter and a building for chemical and blowers. Additionally, this alternative would include any necessary biosolids removal from the existing ponds, fill material to decommission the existing ponds, electrical site work, and yard piping. This option was compared with the evaporative pond system and found to be significantly more expensive to construct and operate.

The most desirable and cost-effective option is the alternative for Complete Retention/Evaporative Pond System. The proposed project includes decommissioning of the existing facility and the construction of a new evaporative pond system and all associated equipment. Complete retention and evaporation ponds are a viable alternative in areas where the moisture deficit (evaporation minus rainfall) exceeds 30 inches annually. These ponds are attractive because they require no treatment components, chemicals, or sampling. Complete retention ponds must be sized to provide the necessary water surface area to evaporate the annual wastewater volume plus the precipitation that falls into the pond throughout the year.

The population of the Town of Ramah has fluctuated between 98 to 132 people over the previous 29 years of reported data from the US Census Bureau. Since 2001 the town has seen a relatively constant increase in population averaging 0.69% annual increase. Assuming an average growth rate of 0.69%, the existing population is estimated at 132 as of 2021. An average max month flow of 85 gpd per capita was assumed for the service area per standard design conditions. Utilizing this usage rate and the existing population estimate of 132, an existing average daily flow of 11,203 gpd was determined. Using the projected population estimates, the 20-year average day flow was calculated to be approximately 12,855 gpd. In order to be conservative, the facility will be designed for 15,000 gpd.

To properly hold and evaporate the 15,000 gpd of wastewater with no overflow, a total top of berm area of approximately 8.5 acres and a total land area of 10.3 acres is required. The ponds will need to be lined with a synthetic liner to avoid any discharge to groundwater.

2.303 (5g): *Description of relevant conservation techniques to be used in the construction and operation of the Project.*

Best management practices will be followed for the construction of the lift station. This includes storm water/drainage conservation techniques.

2.303 (5h): *Description of demands that this Project expects to meet and basis for projections of that demand.*

The proposed lift station is designed to convey an average wastewater flow of 11,203 gpd (7.8 gpm) with a peak hour flow of 60,000 gpd (41.7 gpm). Due to the available pump sizes, the lift station will likely be designed to be pump at 45 gpm, which is a higher flow rate than is required to handle peak hour flows. Because the town is planning on modest future growth, the design flow is based on the future projected flow. The lift station is also designed to limit the amount of time the wastewater will sit in the wet well before being pumped into the system at current average day flows. A more detailed explanation of the flow rates and how the lift station will operate can be seen in the Site Application in Exhibit I.

2.303 (5i): *List of adjacent property owners and their mailing addresses.*

Adjacent property owners to the proposed wastewater treatment facility are as follows:

Owner: Ramah Municipal Cemetery
Location: E Ramah Rd
Mailing Address: 113 S. Commercial St
Ramah, CO 80832

Owner: Carl Finney
Location: 35258 E Ramah RD
Mailing Address: 35258 E Ramah RD
Ramah, CO 80832

Owner: Ruben Valdez
Location: 35801 E Ramah Rd
Mailing Address: 35801 E Ramah Rd
Ramah, CO 80832-9404

Owner: Youth Education Corp
Location: E Highway 24
Mailing Address: 8400 E Crescent PKWY 664
Englewood, CO 80111

Owner: Reskurtas West Inc
Location: Ramah Hwy
Mailing Address: 34250 Harrisville Rd
Calhan, CO 80808-9404

Adjacent property owners to the proposed lift station facility are as follows:

Owner: Cynthia Tompkins
Location: 13 Pikes Peak Ave
Mailing Address: 13 Pikes Peak Ave
Ramah, CO 80832-9519

Owner: Woodrow D Smith
Location: E Second St
Mailing Address: PO BOX 823
Kiowa, CO 80117-8023

Owner: Woodrow D smith
Location: 01-11-61
Mailing Address: PO BOX 823
Kiowa, CO 80117-8023

Owner: Woodrow D Smith
Location: 01-11-61
Mailing Address: PO BOX 823
Kiowa, CO 80117-8023

Owner: Woodrow D Smith
Location: Pikes Peak Ave
Mailing Address: PO BOX 823
Kiowa, CO 80117-8023

Owner: Patrick J McCarthy
Location: Rock Island Ave
Mailing Address: PO BOX 161
Ramah, CO 80832-0161

Owner: Tracey Silva
Location: 104 Rock Island Ave
Mailing Address: 18975 County Rd 101
Ramah, CO 80832-9604

SECTION 2.303 (6) PROPERTY RIGHTS, OTHER PERMITS, AND APPROVALS

2.303 (6a): *Description of property rights that are necessary for or that will be affected by the Project, including easements and property rights proposed to be acquired through negotiation or condemnation.*

The proposed project will take place on the Town of Ramah’s property for the proposed evaporative ponds and will take place within and along town and county right-of-way for the lift station and force main. A Work within Right-of-Way Permit will be required for the force main portions that run along the El Paso County right-of-way on East Ramah Rd. This permit will need to be completed and filed by the selected contractor after the bidding process and the project is awarded. The bidding process is anticipated to be completed in the spring of 2023. The blank permit application form is included in Exhibit Z. The completed permit will be included with the Site Development Plan Submittal once a contractor has been selected.

2.303 (6b): *A list of all other federal, state and local permits and approvals that will be required for the Project, together with any proposal for coordinating these approvals with the County permitting process. Copies of any permits or approvals related to the Project that have been granted.*

Below is a list of federal, state and local permits and approvals that will be required:

- CDPHE Approval of Design
- Work Within Right of Way Permit (to obtained by the contractor prior to construction; to be included with the Site Development Plan Submittal)
- Site Development Plan
- CDOT Special Use Utility Permit
- Local Stormwater and erosion control permits including the Grading and Erosion Control (GEC) Plan, Stormwater Management Plan (SWMP), and Erosion & Stormwater Quality Control Permit (ESQCP)

A Special Use Utility Permit is anticipated to be required from the Colorado DOT for the directional drilling under the right-of-way on Highway 24. That permit will be obtained with the DOT closer to construction commencing once a contractor has been selected for the project. No other state or federal permits are anticipated.

The local stormwater and erosion control permits include the Grading and Erosion Control (GEC) Plan, Stormwater Management Plan (SWMP), and Erosion & Stormwater Quality Control Permit (ESQCP) as required for the Site Development Plan with El Paso County. These will be filed and completed as part of the Site Development Plan application.

The selected contractor will be responsible for obtaining and maintaining all necessary state and local permits, including traffic control, if necessary.

2.303 (6c): *Copies of relevant official federal and state consultation correspondence prepared for the Project; a description of all mitigation required by federal, state and local authorities; and copies of any draft or final environmental assessments or impact statements required for the Project.*

The Site Application for the project, which was submitted to CDPHE, is included in Exhibit I.

SECTION 2.303 (7) LAND USE

2.303 (7a): *Provide a map at a scale relevant to the Project and acceptable to the Department describing existing land uses and existing zoning of the proposed Project area and the Project service area, including peripheral lands which may be impacted. The land use map shall include but need not necessarily be limited to the following categories: residential, commercial, industrial, extractive, transportation, communication and utility, institutional, open space, outdoor recreation, agricultural, forest land and water bodies. Show all special districts (school, fire, water, sanitation, etc.) within the Project area.*

A land use map is attached in Exhibit K. According to this map and the El Paso County Assessor, the project site for the evaporative ponds is Zoned as A-35 (Agricultural) and the lift station project site is zoned as RS-20000 (Residential suburban).

The town of Ramah and the project sites are located within the Big Sandy Fire Protection District and the El Paso County School District No. 100J (Big Sandy School District), based on the El Paso County Assessor's details of the property and as seen in Exhibit L.

The town and project area are located in the Upper Big Sandy Ground Water District. Because the proposed wastewater facility is evaporative and non-discharging, no impacts to the district associated with the project are anticipated. The Upper Big Sandy Ground Water District map is included in Exhibit NN.

2.303 (7b): *All immediately affected public land boundaries should be indicated on the map. Potential impacts of the proposed development upon public lands will be visually illustrated on the map as well as described in the text.*

There are no known public lands other than the public right of ways (E Ramah RD and US Hwy 24) that are adjacent to the property.

2.303 (7c): *Specify whether and how the proposed Project conforms to the El Paso County Master Plan.*

El Paso County Master Plan

The El Paso County 2021 Master Plan states that one its top goals is to achieve a balance of conservation with new growth and development. It also states the prioritization to recognize and promote the importance of being good stewards of the natural environment. The plan works to addresses some key questions: Where will people live? Where will people work? What areas are likely to develop and what areas are likely to stay the same? How will it protect valued habitat and environmental areas? How will people get around? How does the county make sure it provides the services and infrastructure people, and businesses depend on? And how can El Paso County grow responsibly?

The proposed wastewater improvements for the Town of Ramah, like the County Master Plan, also intends to address some the key issues including ensuring reliable services and infrastructure that people depend on and protecting valued habitat and environmental areas. In these areas, the proposed wastewater improvements project complies and addresses the same priorities of the El Paso County Master Plan.

The proposed wastewater improvements project will help to ensure more reliable wastewater services and infrastructure to the Ramah community. This includes replacing its exiting wastewater treatment pond facility that cannot adequately meet existing wastewater demand and treatment requirements. The existing facility is not permitted with El Paso County or the State of Colorado and therefore cannot be regulated to ensure it is operating safely and adequately. In addition, the pond is not lined with any synthetic impermeable type of liner which makes it highly likely to be seeping into the surrounding groundwater and soils. That coupled with the fact that the pond is undersized to function as an evaporative, non-discharging pond which is how it is currently being operated as makes it in inadequate to be able to serve the communities' wastewater demands. Furthermore, the existing pond sits within the Zone A, 100-year floodplain making it susceptible to flooding and endangering the nearby Big Sand Creek and its downstream basin. All of these deficiencies with the existing facility require its replacement.

The town of Ramah has elected to replace the existing pond facility with a non-discharging evaporative pond facility. The proposed facility will be located on a separate site from the existing pond that will be outside of the 100-year floodplain and still easily accessible to the town operations staff. The proposed facilities' location on East Ramah Road will require a new lift station and force main to convey the town's

collection system flows to the new ponds. The new evaporation ponds, force main and lift station will be constructed in accordance with Colorado Department of Public Health and Environment (CDPHE) standard design criteria. The benefits of the new facility coincide with the state goals of the El Paso County Master Plan of providing services and infrastructure that its citizens and business can depend on. This includes replacing the aging and inadequate existing wastewater facility, having the capacity to treat current and future wastewater demands, establishing compliance with state and county permitting and regulations, providing reliable wastewater service with redundancy for emergencies and having the capability and flexibility to expand the new wastewater infrastructure to accommodate future growth and changes in the community. The proposed wastewater facility will accomplish all of these items.

The proposed ponds will be sized for the current and future average day predicted flows. The proposed ponds site can be easily expanded to add an additional pond in the future should the community to continue to grow past the 20-year planning period or grow faster than projected during that time. The proposed influent lift station will be sized to accommodate the existing and future flows as well as contain two pumps, each capable of handling the existing peak hour demand in the event one needs to be repaired and fails during an emergency. And the proposed force main will be sized to handle existing and future flows from the lift station and collection system. The proposed system will provide more reliable service to the community through wastewater infrastructure that is easily operated, maintained, and protected making it both a reliable and resilient new piece of critical infrastructure the community can depend on.

The proposed wastewater improvements project will also work to address the County Master Plan goal of protecting valued habitat and environments within El Paso County. The existing wastewater pond facility is located approximately 450 feet to the east of Big Sandy Creek and is directly adjacent to the riparian zone of plains cottonwood trees. This existing pond is not permitted, and not lined with a proper impermeable layer and is likely allowing wastewater to seep into the surround ground water and soils. The existing pond poses a threat to the ecological health of the surrounding groundwater, the riparian habitat and the surface waters of the Big Sandy Creek.

The Big Sandy Creek flows east across the Northeast Portion of El Pas County from sources southeast of the Palmer Divide towards Ramah and the county line and then continuing east towards Simla. The creek is one of the major tributaries to the Arkansas River in the eastern plains. It is also an important source of water of water for multiple communities and agricultural enterprises, in El Paso County and across the eastern plains of the state. It also provides an important and sensitive riparian habitat comprising various brush, fertile grasses, and plains cottonwood trees that numerous native plains species and stock rely on for habitat and food. The riparian zone that follows the winding Big Sandy Creek across El Paso County is an important and sensitive environment that provides agricultural and recreational benefits to the county such as the Ramah State Wildlife Area and Reservoir.

The proposed wastewater improvements project will help to preserve and maintain this sensitive and important habitat. It will do so by removing and replacing the existing and leaking wastewater pond so that it can no longer degrade or threaten the surrounding environment. This will provide a net benefit to the surrounding groundwater and surface water including the Big Sandy Creek and the important riparian habitat. Furthermore, the proposed new wastewater facility will provide the highest level of treatment with respect to surrounding groundwater and surface waters because it will be non-discharging. Evaporative ponds are a commonly used facility across Colorado's eastern plains communities because of they typically can offer the highest level of treatment and preservation of surrounding waters with relatively low operation and maintenance costs and moderate capital costs. By replacing the existing facility with a non-discharging, evaporative facility, the proposed wastewater project addresses the goals of the El Paso

County Master Plan for providing dependable infrastructure and services as well as protecting and preserving valuable habitats and environments.

Parks Master Plan

The proposed wastewater project will comply with the general goals of the 2013 El Paso County Parks Plan of acquiring, developing, maintaining, and preserving regional parks, trails, and open spaces. Specifically, the proposed improvements will assist the County Parks plan's goals of maintaining and preserving regional trails and open spaces which includes the Rock Island Regional Trail. The Rock Island Regional Trail is a 23-mile-long trail corridor that will eventually run along Highway 24 from Falcon to Ramah. The trail currently ends at the trailhead in Payton; however, the full extension and completion of the trail to Ramah and the El Paso County line has been proposed to be completed in the next few years. The proposed wastewater improvements project in Ramah will not disrupt or impede the completion of the Rock Island Regional Trail. The proposed trail extension will likely cross the proposed force main alignment where it crosses Highway 24 and onto to East Ramah Road. The proposed project will not disrupt the trail or impact the surround aesthetics because this portion of the force main will be directional drilled underneath the highway and will not involved open cut installation until it reaches further onto East Ramah Road. The proposed evaporative ponds on East Ramah Road are also not anticipated to in any way effect or impact the quality of the proposed Rock Island Regional Trail through Ramah as they will not be visible from the trail corridor along Highway 24.

The proposed improvements will also help to improve the surrounding surface water and ground water quality in the around Ramah and the regional trail as it will eliminate the existing wastewater treatment pond that is known to be leaking into the surround groundwater near the big Sandy Creek. Eliminating the existing wastewater pond will improve the surrounding water resources and thus providing a net benefit to the surrounding recreation areas including the proposed regional trail extension. The benefits from the proposed wastewater improvements meet and assist in the El Paso County Parks Master Plan goals of maintaining and preserving regional parks, trails, and open spaces.

Master Plan for mineral extraction

The El Paso Master Plan for Mineral Extraction was reviewed to ensure the proposed wastewater treatment project in Ramah addresses and complies with the priorities set forth for the county in this master plan. The Mineral Extraction Master Plan Mineral Resource Evaluation (Map 1) was reviewed to determine any potential impacts or conflicts the proposed wastewater project in Ramah may have with existing or future mining activities. See Exhibit EE El Paso County Mineral Extraction Master Plan Resource Map. That The around in and around Ramah is characterized as a combination of Valley Fill and Upland Deposits areas. The area near Ramah is identified as consisting of Dawson and Laramie coal with 0-150 feet of overburden. This area of potential coal is outside of the existing town limits and the proposed project locations for the evaporative ponds and the lift station. The nearest, active listed mine to the proposed project area was approximately 3.5 miles away to the southeast off of Ramah Highway between Alfred Road and Middle Brook Road. The existing land use surrounding the project area including the proposed site for the wastewater facility is mostly rural agricultural land. The existing property for the proposed treatment facility is currently a agricultural hay field. Given the land use of the proposed site as agricultural, the distance to the closest active mining operation and the relatively low mineral interest and potential of the area, the proposed wastewater project is not anticipated to impact or effect existing or future mining operations and mineral interests. See El Paso County Master Plan for Mineral Extraction Map 1 in the attached appendices of this application.

Water Master Plan

Although the proposed wastewater improvements project in Ramah does not directly involve water supply resources it does adhere to and comply with the broader goals of the El Paso County Water Master Plan. The water master plan is intended to be implemented by the county so that it will be a powerful tool to help ensure that land use decisions are based on balancing efficient use of limited water supplies with the water needs of current and future residents. The core priorities identified by the county water master plan are the provision of adequate water supplies, the coordination of land use planning with water demand, efficiency and conservation, the integration of water and land use planning and the promotion of environmental issues associated with water use.

The proposed wastewater project in Ramah adheres to and supports the goals of the water master plan, particularly the goal for the preservation and provision of adequate water supplies for the county. The proposed wastewater project will work to assist in this goal in two main ways. The first being the existing wastewater facility pond currently being used by the town. The existing pond is located relatively close to surface waters (approximately 450 feet east of Big Sandy Creek) and is an unlined and unpermitted wastewater facility. Given the construction of this pond, it is suspected to be source of wastewater contamination into the surrounding groundwater, soils and potentially into the surround surface waters. In addition to the potential negative ecological impact this may have on the surrounding environment, it also poses a threat to water resources in the Big Sandy Creek and the greater area groundwater.

The El Paso County Water Master Plan states that the county is not particularly rich in its renewable water supply resources with the only a handful of major freshwater creeks within the boundaries of the county. The majority of the water supplies for the county come from the Denver and designated Aquifers, which are considered a non-renewable water resource, the remaining supplies are then sourced from Colorado Springs Utilities and its partners or from other smaller supplies such as the Big Sandy Creek. Therefore the protection and preservation of these freshwater supplies within the county is essential for the water master plan goals and future land and resource planning. By eliminating the town's existing wastewater pond and replacing it with a new facility, the proposed Ramah waster project helps to address a key element of the count water master plan.

The second way in which the proposed wastewater project addresses the states goals of the water master plan is from the facility proposed to replace the existing pond facility. The proposed wastewater facility will be a non-discharging evaporative pond facility constructed of three, synthetically lined ponds that will be built with 2 feet of freeboard capacity (above the maximum fill capacity) and will be sized to treat the current and future estimated wastewater demand for the town. Evaporative ponds are typically the method of providing the highest level of wastewater treatment for rural plains communities because they do not introduce any wastewater either treated or untreated into surrounding surface or groundwaters. The proposed wastewater facility therefore provides a net benefit to the surround environments of Ramah and this portion of El Paso County, more specifically for the water resources. The benefits are to the surrounding water supply resources which includes private domestic and municipal wells including the two wells for the supply to the Town of Ramah. The proposed wastewater improvements project will both eliminate an existing source of potential contamination to water supplies as well prevent future contamination and therefore better protect water supplies including the town's own municipal supply. By better protecting and preserving the surrounding water resources for existing and future uses, the proposed wastewater treatment project in Ramah addresses and supports the goals of the County Water Master Plan.

Major Transportation Corridors Plan

The proposed wastewater improvements project for the town of Ramah proposes the elimination of its existing treatment pond facility located off of Pikes Peak Ave in Ramah and its replacement with a new evaporative pond facility located south of town on East Ramah Road. For the new facility, a lift station and force main will be needed to convey wastewater from the town collection system south of town, across Highway 24 and along East Ramah Road to the proposed site of the evaporative ponds on a parcel of land currently used for haying that the town acquired in 2020. After reviewing the 2016 Major Transportation Corridors Plan (MTCP) for El Paso County, the proposed wastewater improvements project for Ramah is not anticipated to disrupt or negatively impact the goals and projects set forth by this plan. See Exhibit HH, II, and JJ for the El Paso County Transportation Master Plan Pedestrian Network Map, Corridor Preservation Plan Map, and Truck Routes Map respectively.

The goals set forth by the 2016 MTCP include updating future transportation, creating a prioritized list of transportation improvements, creating a funding plan for ensuring adequate resources to build the future transportation system, review multimodal transportation needs, preservation of rights-of-way for each roadway corridor, review and adjust policies and strategies to implement the plan and create a basis for the Road Impact Fee. Of all the priorities of the MTCP, the ones that relate to the proposed wastewater improvements in Ramah include the rights-of-way preservation, prioritized transportation improvements in the area and multimodal transportation needs.

Multimodal transportation needs include the maintenance and expansion of various forms of transportation needs such as bike lanes, walkways and sidewalks and trail corridors. The Rock Island Trail expansion is proposed to extend the existing Rock Island Trail at the trailhead in Payton to extend along the Highway 24 right-of-way past Ramah and to the El Paso County Line. Additional proposed trail extensions that would link up with the Rock Island Regional Trail at the Ramah State Wildlife Area are also proposed. The proposed wastewater improvements in Ramah will not impact or disrupt the proposed trail extension as the proposed force main across Highway 24 will be installed via directional drilling underneath the highway corridor from the town right of way in Ramah to county right of way on East Ramah Road. The proposed force main crossing will not involve any open cut installation inside or adjacent to the highway or proposed trail. The proposed evaporative ponds on East Ramah Road are not anticipated to be visible from Highway 24 or the proposed Rock Island Regional Trail and will not negatively impact any visual or aesthetic qualities of the trail.

The proposed wastewater improvements are not anticipated to negatively impact any proposed roadway improvements set forth by the MTCP including the proposed paving project for the Ramah Highway. The proposed force main will be installed outside of pavement on the shoulder of town roads wherever possible and will cross underneath Highway 24 as to not impact it for traffic or its road surface. The installation of force main will be limited to county roads on East Ramah Road and will result with the dirt road base surface being restored to county standards. No force main installation will be done on the section of Ramah Highway that is proposed to be paved and it will not be impacted by the proposed project.

The final section of the MTCP that the proposed wastewater project complies with, and addresses is the right of way preservation for El Paso County corridors. The portion of the proposed project that is to be within county roads right of way will be permitted through the county right of way permit and will adhere to all requirements outlined in the permitting process during construction and post construction restoration. Impacts to county roads during construction will be limited to a small section of East Ramah Road, approximately 1,000 of pipe installation within the county right of way on East Ramah Road and will be conducted to minimize the disruption of traffic during construction including maintaining with open lane

at all times with traffic control crews and will be limited to weekdays and normal working hours unless advanced approval from the county is given for work outside of these times. Impacts to county roads after construction is complete is not anticipated as the operation and maintenance for the new ponds facility will be minimal. On average, the facility is anticipated to be maintained by a single pickup truck for operations staff and will be visited one to three times per week. No other additional traffic on county roads is anticipated as a result of the new ponds facility with the exception of the removal of accumulated wastewater sludge from the ponds which is anticipated to be required one to two times every 20 years of facility operation. After review and consideration, the proposed wastewater ponds are anticipated to adhere to the MTCP for El Paso County will not impact or disrupt any of the proposed projects set forth by this plan.

2.303 (7d): *Specify whether and how the proposed Project conforms to applicable regional and state planning policies.*

The proposed project was reviewed in consideration of regional and state planning agencies to confirm its general conformance with the policies set forth by those regional and state planning organizations. The town of Ramah and El Paso County are included with the Pikes Peak Area Council of Governments and therefore are subject to policies established in its Regional Water Quality Plan. The proposed project was reviewed to determine its conformance with the regional water quality plan in three core areas; the general goals and objectives, potential impacts to any of the five watershed basins within the Pike Peak Region, and adherence to the established policy objectives that relate to the proposed project.

The general goals and objectives of the Regional Water Quality Plan are centered around maintaining consistency with the Clean Water Act and the goal of restoring and maintaining the chemical, physical and biological integrity of waters. To achieve this goal, the plan set five objectives which include the following:

1. Improving watershed health by implementing strategies that improve water quality and maintain a balance with the natural environment and designated land uses.
2. Restore and maintain the designated uses of the streams and creeks to ensure protection of public health, aquatic life, agriculture, recreation and surface and groundwater supplies.
3. Identify current and future wastewater treatment needs through a regional collaborative process and implement strategies that improve water quality.
4. Develop solutions that consider environmental, social, and economic impacts to both point and nonpoint source problems.
5. Encourage local governments, special districts, business, and other stakeholders within the water sheds to adopt polices and operating practices with the 208 plan.

The proposed wastewater project in Ramah will conform to the goals and objectives of the regional water quality plan because it addresses or conforms to the 5 core objectives of the plan. The proposed project will remove the exiting treatment pond facility which is currently acting as a potential source of contamination to the surround groundwater and surface waters. By removing it and replacing it with a new facility, the project will help to improve the surrounding water quality. Similarly, the proposed project will help address the second objective as the removal of the existing pond facility will add a net benefit to the surrounding area in relation to public health, aquatic life, recreation and surface and ground water supplies

since the existing pond will not longer be leaking wastewater into the environment. The proposed project has conformed to goal number three as well as the proposed project has be subject to the regional collaborative planning process to improve water quality as the project is being reviewed by both the state, county and regional planning entities as part of the current design process. This includes the site location approvals from the state and county as well as the Pikes Peak Area Council of Governments (PPACG) review by the water quality division. The proposed project has obtained both state site application review and approval as well as PPACG review and approval.

The proposed project also addresses and conforms to the objective of solutions developed to consider environmental and economic impacts so various source problems. In the case of this project, this is in regard to a point source issue being the existing wastewater treatment pond that is a known point source problem to the surrounding environment as it inadequately treats and leaks wastewater. The proposed project was selected from a list of considered alternatives to replacing the existing wastewater pond facility and was selected because it was determined to provide the best level of wastewater treatment while also remaining financially feasible for the community it serves. The evaporation ponds facility that is proposed to replace the existing ponds will be less expensive in both capital costs and operation and maintenance costs and also provides an equal or higher level of treatment that the other alternatives as evaporative ponds do not discharge to surface or ground water and therefore do not impact or introduce any contamination to surrounding waters. The other alternatives considered included consolidation with a neighboring wastewater system, a modified lagoon facility upgrade and a mechanical activated sludge facility.

The proposed project does not address the fifth objective of the regional plan as promotion of watershed policies is outside the scope of the wastewater improvements though the project does support and adopts the overarching concept of working to improve regional watersheds and waters and involving stakeholders in the process.

In addition to the overarching objectives and goals of the regional plan, the proposed project was also reviewed to determine its compliance with the second core function of the plan which is the assessment recommendations for policies for water quality issues and concerns involving the five watersheds within the Pikes Peak Region. The five main watersheds within the Pikes Peak Region include the South Platte Headwaters, Upper South Platte Watershed, Upper Arkansas Watershed, Fountain Creek Watershed, and the Chico Creek Watershed. As shown in the figure below, the proposed project area in Ramah lies outside of any of these watersheds. Although the proposed project is outside of the watersheds evaluated in the regional plan, the project still meets the core objectives outlined in the plan that are intended to reduce impacts to and help manage these watersheds and others in the region.

Lastly, the regional plan was reviewed to determine the proposed projects adherence to the applicable policy objectives that relate to the scope of the wastewater improvements. Of the seven key policy objectives of the regional plan, the three that were determined to be applicable to the proposed project were the policy objectives for riparian and wetlands areas, source water protection for public water supplies and wastewater treatment facilities.

The proposed project will remove the existing wastewater pond facility in Ramah that is located next to the Big Sandy Creek and at the edge of the riparian zone that surrounds the creek. The existing facility is inadequate sized to treat the average day flow of the town's wastewater system was constructed without an impermeable lining resulting in its leaking of wastewater into its surroundings including the riparian zone around the creek. The proposed proposes the removal of the pond and its accumulated biosolids and wastewater and the restoration of the area it comprises back to the condition of the surrounding floodplain.

Its removal and replacement with a new wastewater facility outside of the riparian zone and floodplain will improve the surrounding riparian zone and floodplains because the wastewater contaminate source will be eliminated. The construction involved with the removal of the pond and restoration of the area will be done carefully and follow the guidance of all applicable best management practices (BMPs) to prevent impacts from stormwater runoff and sedimentation during construction into the nearby riparian zone and floodplain. This will include but not limited to the installation of silt fencing and hay wattles along the perimeters of the disturbed areas, cleaning construction equipment prior to entering the area, preservation of existing topsoil, placing erosion control matting on disturbed surfaces and the establishment of permanent vegetive cover using native grasses seed mixes and plant species as recommended by the state parks and wildlife department and county conservation district.

Source Water Protection for public water supplies and wastewater treatment facilities will be adhered to by the proposed project because it helps to eliminate existing point sources of contamination which includes the existing treatment facility pond in Ramah. The existing facility sits next to the Big Sandy Creek and within a half mile of the Town of Ramah's existing municipal wells.

Furthermore, the proposed facility that will replace the existing ponds will be an evaporation facility. This will be a non-discharging facility that utilizes the evaporation of wastewater from the sun to consolidate wastewater into a solid sludge that accumulates at the bottom of the ponds that is then periodically removed from the ponds, typically once every 10 years. The proposed facility will not require the use of treatment chemicals, nor will it require the discharge into surface waters or ground waters as part of its treatment process. The proposed project and new wastewater facility therefore adhere to and support the objectives of this policy because it works to remove and prevent sources of potential harm and contamination to public water supplies.

Wastewater Treatment facilities are a policy objective established in the PPACG regional water quality plan because they have the potential to impact surface and groundwaters. The plan seeks to help guide decisions to locate wastewater treatment systems, interceptors and lift stations in a manner that protects water quality and recognizes the protection of floodplains, geologic hazard areas, wildlife habitats, wetlands and agricultural land. The proposed wastewater improvements project has been designed with respect to these considerations in the policy objective.

The project will remove and replace the existing wastewater pond facility which is located within the 100-year floodplain north of Ramah. The existing facility also encroaches on the sensitive and important riparian zone habitat the surround the Big Sandy Creek and is a suspected source of wastewater contamination to it. Its removal and the restoration of that area it comprises follows and supports the policy objective to protect this portion of the floodplain and riparian habitat.

In addition, the proposed facility to replace it will be located away from the sensitive riparian habitat and the floodplain as the evaporative ponds will be located above the base flood elevation in the area and will be constructed on previously used agricultural land. The impact of the loss of this agricultural land will be minimal to the area as the facility site includes approximately 35 acres of land previously used for hay production only. The other project components including the proposed lift station and force main are not anticipated to negatively impact water quality floodplains, wetlands or wildlife habitats. The proposed lift station will be constructed on previously developed land within the town right of way. The proposed force main will be installed within town and county rights of way and will be installed within previously disturbed land under the roadway surface. The proposed wastewater facility project will adhere to the applicable policy objectives and greater goals of the PPACG Regional Water Quality Plan.

2.303 (7e): *Specify whether and how the proposed Project conforms to applicable federal land management policies.*

The project does not involve any federal lands.

2.303 (7f): *If relevant to the Project design, describe the agricultural productivity capability of the land in the Project area, using Natural Resource Conservation Service soils classification data.*

The NRCS soils classification map of the proposed lift station and evaporative pond can be seen in Exhibit M. As seen, the area around the proposed lift station site is mostly Nunn clay loam.

The area around the proposed evaporative pond is comprised mostly of Manzanst clay loam and Terry-Razor complex. The soils in the area around the pond are considered suitable for agriculture and the land was previously used for agricultural production prior to the Town acquiring the parcel for the proposed evaporative ponds. The area around the lift station location has been previously developed and given its designation as town right-of-way and close proximity to roads and residential structures, it would not be considered suitable for agriculture.

2.303 (7g): *Describe the robability that the Project may be significantly affected by earthquakes, floods, fires, snow, slides, avalanches, rockslides or landslides and any measures that will be taken to reduce the impact of such events upon the Project.*

Resources for Colorado hazard classifications were reviewed for potential hazard threats to the proposed project site. The location was reviewed for risks to flooding, earthquakes, fires, snow, land and rockslides and avalanches. The project, including the proposed lift station and evaporative ponds location, are located outside of the natural floodplain as documented in the FEMA FIRM Map included in Exhibit Q. To ensure the reduction of risk to flooding, the proposed evaporative pond embankments will be constructed 9 feet above the approximate elevation of the 100-year floodplain. The lift station site will be raised so that the final grade of the lift station structures sit at a minimum of approximately 2.0 feet above the approximate elevation of the 100-year floodplain. The 100-year floodplain base flood is delineated in the FIRM map in Exhibit Q; however, no base flood elevation is determined under the Flood Zone A classification of the surrounding floodplain in Ramah. From the survey of the proposed project area, the elevation of the 100-year floodplain was delineated to be approximately 6087 ft above sea level.

The project was reviewed for potential burn probability using the Colorado State Forest Service Wildfire Risk Public Viewer. The area around the project location was shown to be in a low to moderately low burn probability area. Wildfire risk is relatively low and unlikely for the project area but does remain a serious low probability threat, much like the rest of the eastern Colorado plains. See Exhibit FF El Paso County Burn Probability Map.

Reviewing for avalanche hazard risk, the Colorado Avalanche Information Center (CAIC) showed that there has only been one recorded avalanche fatality in El Paso County since 1950-1951. Most avalanche fatalities are the result of backcountry recreationists traveling the steep mountain slopes of Western Colorado. Given the relatively dry and flat geography and the location in the eastern plains region of the state, the threat from avalanche and other snow hazards are very low in the proposed project area.

The project location was also reviewed for potential hazards due to earthquakes and seismic activity. The Colorado Geologic Survey was review for its Earthquake and Fault Map Viewer that showed there are known fault locations and recorded earthquakes that have occurred in El Paso County including the Ute

Pass Fault Zone and the Rampart Range Fault Zone. See Exhibit KK for the Colorado Seismic Hazard Map. These faults as well as the recorded earthquakes are on the far western edge of the County and approximately 50 miles from the proposed project site. Reviewing the USGS long-term seismic hazard map for Colorado, the area around the proposed project location is categorized as the second lowest to third lowest for seismic hazards.

The project location was also reviewed for potential hazards to rockfalls and landslides. The Colorado Geologic Survey Rockfall Event Map shows that there are no known rockfall events near the proposed project location. It also shows there are no areas near or in the proposed project area with slopes greater than 30 degrees, the slopes at which rock and landslides have a significantly higher chance of occurring. Given the distance away from any steep slopes and the relatively flat topography of the area around the proposed project site, potential for rockfalls and landslides is low.

The project location was also reviewed for potential hazards from wind. Wind hazards in Colorado take three forms; high wind, severe thunderstorms and tornadoes. High winds are wind events with sustained wind speeds of 40 mph or greater lasting for one hour or longer, or winds of 58 mph or greater for any duration according to the National Weather Service. Tornadoes are a localized, violently destructive windstorm occurring over land. Tornadoes are generated by severe thunderstorms. Tornadoes in Colorado are most frequent in the spring and early summer when warm, moist air from the Gulf of Mexico collides with cold air from the polar regions to generate severe thunderstorms. These thunderstorms often produce the violently rotating columns of wind known as funnel clouds. A severe thunderstorm is a storm that produces winds of at least 58 mph, hail and or a tornado. Structural wind damage may imply the occurrence of a severe thunderstorm.

High wind events in Colorado are most common along the Front Range and in the northeastern counties. The primary threat of tornado is east of the Continental Divide along the Front Range and foothills. Adams, Weld and Washington counties have experienced the most tornadoes between 1950 and 2010. Most of the tornadoes that occur in the region are relatively small and short lived, though occasionally strong tornadoes have been reported. Though thunderstorms are still relatively infrequent along the front range and eastern plains, thunderstorms are quite prevalent in the Eastern Plains and along the eastern slopes of the mountains. Thunderstorms can still spawn the super cells that can have tornadoes or hail embedded in them. Given Ramah's location in the high, central Eastern Plains of the state, the proposed project location is a moderate area for risk to wind hazards.

The proposed project location was also reviewed for hazards to severe winter storms and snow. A winter storm is defined as a prolonged event involving snow or ice. All areas of Colorado are vulnerable to the adverse impacts of severe winter weather. Average snowfall is 72 inches or greater in the central and western areas of the state. In El Paso County, high snowfall averages is also true for the far western and mountainous areas although as it moves further east and lower in elevation the chances and totals for snowfall intensity diminishes. While blizzards are less frequent and drop less snow in areas further east, such as in Ramah on the high Eastern Plains, they can still be significant and hazardous. The average annual snowfall for Colorado Springs is approximately 39 inches per year according to the Western Regional Climate Center. The likelihood for severe winter weather in and around the proposed project location is moderate.

2.303 (7h): *Specify if excess service capabilities created by the proposed Project will prove likely to generate sprawl or strip development.*

The parts of the town that are not currently developed are mostly to the north and east of Pikes Peak Ave. The majority of the currently undeveloped land within the town limits is not likely to be developed because it sits within the 100-year floodplain. Development is generally difficult and costly within the floodplain and is not anticipated at this time in that area. See Exhibit DD – Town Platt Map with Floodplain limits.

The maximum capacity of the new wastewater system is designed for 15,000 gpd. This would be the max capacity that the system can treat and the cap of development in the service area. Based on standard design conditions for per capita flow and the 2020 census population, the existing daily flow in Ramah is estimated at 11,000 gpd. It is not expected to increase rapidly as is the population based on the past population growth rates. Future growth in the area would only affect the proposed treatment facility if it is to occur within the existing incorporated town limits for Ramah, which is somewhat limited based on the boundaries of the 100-year floodplain. Growth outside of the town limits would also be outside of the existing service area for Ramah and the wastewater system. Growth in those areas would likely be served by onsite wastewater treatment systems at the residential or subdivision level. If significant growth does occur in the Ramah service area above the what is projected over the 20-year planning period, the proposed site for the wastewater treatment ponds has available room for expansion. One of the benefits of the proposed evaporative ponds are that they can be easily expanded to add an additional pond to the treatment process without significantly altering the existing ponds or the operation and maintenance requirements.

2.303 (7i): *Specify whether the demand for the Project is associated with development within or contiguous to existing service areas.*

The proposed project will accommodate existing and future wastewater flow demands within the town service area. As the existing facility in Ramah does not meter wastewater flow, design for the proposed facility had to rely on wastewater flow projections. Based on the population of 132 residents and standard design conditions of 85 gpd per capita (gpd/pc), the existing average daily flow in the service area was estimated to be approximately 11,200 gpd. The service area population based on observed annual growth rates of 0.7% for the 20-year planning period was projected at 151. The projected 20-year planning period average daily flow was estimated at 12,800 gpd.

The proposed evaporative ponds are sized at 485 long by 258 wide at the top for an area of 124,000 square feet (sf) or 2.85 acres each for a total pond area of 8.55 acres. The proposed evaporative ponds are sized for the existing and future average daily flows. The ponds are sized based on the permitted hydraulic loading rate of 15,000 gpd. The proposed permitted hydraulic loading rate will accommodate both the existing and future service area flows as it allows for approximately 33% of additional ponds capacity for the existing daily flow and approximately 17% additional capacity for the future daily flow.

The proposed lift station is also sized to accommodate existing and projected future average day demand as well as the peak hour demand based on the proposed permitted hydraulic loading limit. The proposed hydraulic loading limit of 15,000 gpd equates to approximately 10 gpm. The lift station wet well and pumps will also be sized to accommodate the estimated peak hour flow rate which was estimated to be 4 times the permitted hydraulic loading rate at 60,000 gpd. This equates to approximately 42 gpm. The lift station will be equipped with two (2) submersible grinder pumps each capable of pumping the peak hour flow rate of 42 gpm. The proposed lift station will also include an emergency overflow storage tank to accommodate

the required two hours of emergency storage at the peak hour flow rate of 42 gpm. The peak hour flow rate for two hours of storage equates to 5,040 gallons. The proposed tank will be sized for 6,000 gallons to ensure adequate emergency overflow storage should both pumps fail, or the station loses power.

The proposed evaporative ponds facility and lift station are adequately sized to accommodate the existing and future demands of the service area. The proposed project is not responsible or sized for accommodating growth demands outside of the current service area. The proposed project is not anticipated to increase the demand from development and there is no associated development from areas outside of the town limits that will be accommodated by the proposed lift station or evaporative ponds.

Existing wastewater flow projected at about 11,200 gpd (assuming 85 gpd/pc; population of 132)
Future flow in service area (2042) projected at about 12,800 gpd (85 gpd/pc; population of 151)
Proposed permitted hydraulic loading at 15,000 gpd (33% additional capacity from estimated average daily flow) (17% greater than projected future average daily flow)
Ponds Sized for 15,000 gpd average day flow about 11,500 gpd (assuming 85 gpd/pc)
Ponds 485' x 260' (124,000 sf) (2.85 acres) each
Lift Station sized for 15000 gpd average day flow (10 gpm)
Lift Station sized for 60,000 gpd peak hour flow (42 gpm), with emergency overflow storage for 2.5 hours of peak hour flow (42 gpm for 2 hours = 5,040 gal – tank sized for 6,000 gal)

SECTION 2.303 (8) SURFACE AND SUBSURFACE DRAINAGE ANALYSIS

2.303 (8): *The applicant shall supply a surface and subsurface drainage analysis.*

A drainage analysis is included in Exhibit N. The design plans also include erosion control measures as shown in Exhibit H.

SECTION 2.303 (9) FINANCIAL FEASIBILITY OF THE PROJECT

2.303 (9a): *Relevant bond issue, loan and other financing approvals or certifications (ex: approved bond issues; bond counsel opinion).*

The total project cost is estimated at \$2,706,000 for all construction, design and permitting costs. The town applied for and received \$2,000,000 in grant funding from the El Paso County American Rescue Plan Act Water and Wastewater Grant program. The grant will likely be applied to the anticipated construction costs, estimated at \$2,062,000. The remaining costs from construction, permitting and design will be funded through either a Colorado Department of Local Affairs (DOLA) grant funding program or the Colorado state revolving loan fund (SRF) program or a combination of both. The Town plans to apply for both funding options for the remaining project costs, approximately \$750,000. If the town is awarded DOLA grant funding in the amount requested, they would decline any SRF loan funding that was awarded. The town plans to apply for the DOLA grant funding between February and March of 2023 with the awards provided in June of 2023. The town will prepare to submit the SRF loan application in June of 2023 if it does not receive the requested DOLA grant award of \$750,000 to cover the estimated remaining project costs. The estimate remaining project costs of \$700,000 to \$750,000 includes a 15% project contingency of \$309,000.

2.303 (9b): *Business plan that generally describes the financial feasibility of the Project.*

The total project cost is estimated at \$2,706,000 for all construction, design and permitting costs. See Exhibit A Financial Plan Summary for proposed project costs estimate.

The town applied for and received \$2,000,000 in grant funding from the El Paso County American Rescue Plan Act Water and Wastewater Grant program. The grant will likely be applied to the anticipated construction costs, estimated at \$2,062,000. The town also obtained a Design and Engineering Grant for the engineering, design and permitting costs from the Colorado Department of Public Health and Environment (CDPHE). That grant fund totaled \$162,209.

This leave approximately \$544,000 of remaining project costs to be accounted for. The remaining costs from construction and project contingency will be funded through either a Colorado Department of Local Affairs (DOLA) grant funding program or the Colorado state revolving loan fund (SRF) program or a combination of both. The Town plans to apply for both funding options for the remaining project costs, approximately \$544,000. If the town is awarded DOLA grant funding in the amount requested, they would decline any SRF loan funding that was awarded. The town plans to apply for the DOLA grant funding between February and March of 2023 with the awards provided in June of 2023. The town will prepare to submit the SRF loan application in June of 2023 if it does not receive the requested DOLA grant award of \$544,000 to cover the estimated remaining project costs. The estimate remaining project costs of \$544,000 includes a %15 project contingency of \$309,000.

SECTION 2.303 (10) LOCAL INFRASTRUCTURE AND SERVICES IMPACTS

2.303 (10): *An impact analysis that addresses the manner in which the applicant will comply with the relevant Permit Application Review Criteria. The impact analysis shall include the following information: description of existing capacity of and demand for local government services including but not limited to roads, schools, water and wastewater treatment, water supply, emergency services, transportation, infrastructure, and other services necessary to accommodate the Project within El Paso County.*

The project is a new lift station to convey flows from the collection system to the new evaporative pond wastewater treatment facility. The lift station will only serve the existing service area and collection system. The collection system users are predominantly made up of single family, residential units with the exceptions of the US Post Office, the Ramah Town Park and athletic fields and the Ramah Baptist Church.

Temporary disruptions to local roads will occur as a result of the proposed project, particularly for the construction of the proposed lift station and force main. The traffic disruptions from the project will be minor and occur predominantly on town roads along the proposed force main alignment. The force main will cross Highway 24 but is not anticipated to present major traffic disruptions because the force main will be constructed via trenchless installation of directional drilling.

The location of the town's proposed WWTP is outside of town on a large parcel of land accessed from East Ramah Road. The proposed improvements will have little to no impact on local or regional traffic. Both of the project sites will be accessed through existing streets and roads. No oversized freight will be required. The proposed sewer force main construction will take place within existing roads throughout town and on East Ramah Road. Minor traffic control will be required during construction within the town roadways. For work on County Roads, including East Ramah Road, all county control regulations will be followed and implemented as required by the El Paso County Right-of-Way permit. All Colorado Department of

Transportation (CDOT) traffic control requirements will be followed as required for the work on town roads adjacent to the right of way (ROW) of Highway 24 and related to the direction drilling.

The new lift station is not anticipated to increase town wastewater flows as it will only serve the existing service area and service will not be expanded as part of the project. There are no schools, fire stations, police or sheriff's offices or emergency service providers in the service area. Wastewater service will be maintained at all times during construction as the existing wastewater pond and influent septic tank will be kept in service until the new facilities are complete and online.

The project will have a minor, temporary impact to local roads. No impacts to schools, water treatment, water supply, emergency services, transportation, or any other services are anticipated. There are no schools, major businesses, hospitals, emergency service providers such as fire, EMS, or county sheriff's offices in the town or near the project area that would be impacted by the temporary construction and traffic disruptions. Traffic control including the use of flaggers will be used during construction hours to accommodate any emergency service providers that may travel through the project area on town roads or county roads.

SECTION 2.303 (11) RECREATION OPPORTUNITIES

2.303 (11): *Description of the impacts and net effect of the Project on present and potential recreational opportunities.*

There are no anticipated impacts to present or potential recreational opportunities. The parcel that the existing wastewater pond is located on will be retained by the town after the pond is decommissioned and the area restored. The town has no current plans or intended use for that parcel and any such plans are outside the scope of this project. The area of the existing wastewater pond is located within the 100-year floodplain and therefore any future development there either by the town or future owners is not anticipated.

SECTION 2.303 (12) AREAS OF PALEONTOLOGICAL, HISTORIC OR ARCHEOLOGICAL IMPORTANCE

2.303 (12): *Description of the impacts and net effect of the Project on sites of paleontological, historic or archaeological interest.*

The town compiled an environmental assessment report as part of its design and permitting for the proposed wastewater improvements project. As part of the environmental assessment, the town conducted a review with History Colorado and the State Historical Preservation Office (SHPO) in order to review the project for potential impacts to historical or cultural resources. As part of the review process, a file search for cultural and historic resources was requested with History Colorado. The results of the file search were then sent to SHPO for their review and interpretation of the file search. SHPO reviewed the results and concluded in that agreed with the town and element engineering's proposed find of no adverse effect under Section 104 of the Colorado State Register of Historic Places Act. This corresponded with SHPO and their findings is included with this submittal. See Exhibit MM for historical review documentation and correspondence.

It is not anticipated that artifacts of paleontological, historic, or archeological importance will be uncovered during this project; however, if any are uncovered during construction, the appropriate authorities will be notified.

SECTION 2.303 (13) NUISANCE

2.303 (13): *Descriptions of noise, glare, dust, fumes, vibration, and odor levels anticipated to be caused by the Project.*

There will be temporary nuisances including but not limited to noise, dust, fumes, and vibrations during construction due to the required equipment and earthwork that will be required for construction. These are anticipated to be minimal since most of the construction duration will spent on the evaporative ponds site which is 980 feet away from the nearest residence.

The project will involve a long-term odor nuisance due to the project being a wastewater lift station. This is mitigated in the design by limiting the amount of time the wastewater sits in the lift station wet well. At average day flows, the wastewater will sit for approximately 20 minutes between pumping cycles. This is less than the maximum allowable detention time of 60 minutes per CDPHE design criteria, which will help limit the odor nuisance. This should help minimize the odor because the wastewater will be routinely pumped out of the lift station before the gases in the wastewater have time to accumulate and build up into odors. Most odor-producing substances found in domestic wastewater result from the anaerobic decomposition of organic matter containing sulfur and nitrogen. Inorganic gases produced from domestic wastewater decomposition commonly include hydrogen sulfide, ammonia, carbon dioxide and methane. The buildup of those gases will be limited because the wastewater will not be in the lift station long enough for the significant decomposition to occur and produce the odors.

In addition to the limited detention time, a carbon filter will be installed on the air vent for the lift station wet well. This will help to capture and neutralize odors from gases that are generated during the short detention times to help further prevent the dispersion of odors to the station's surroundings. This is a common method use in sub-surface lift stations in residential or urban areas. This method was recommended and supported in multiple conversations with staff from the Water Quality Control Division at CDPHE when reviewing the proposed project and site applications.

Furthermore, the proposed lift station is not anticipated to contribute significantly more odors than the existing influent septic tank used by the town which has not been a known or reported issue for odors. As shown, the existing septic tank is approximately 218 feet to nearest residential structure. The proposed lift station will be approximately 85 feet to the nearest inhabited structure. While the lift station will be closer than the existing septic tank, it will be entirely underground except for the one access hatch, it will have a carbon filter to trap and neutralize any built-up gases, and on average wastewater will only be sitting in there for 20 minutes at a time before being pumped out. Compared to the existing septic tank, which does not have any filter, it has 4 access hatches in which gases and odors can escape from, and it receives all the wastewater from the collection system and accumulates all of the settled wastewater sludge, the lift station will have less chances for odors to build up. Given the lack of known odor issues from the septic tank and the odor control improvements that lift station will use odor nuisances from the lift station are not anticipated to be an issue. The perimeter around the lift station will be fenced off with a 6-foot chain link fence to prevent unauthorized access and eliminate any potential safety hazards to the public.

See Exhibit CC for proposed facilities setback distances from residences. The proposed evaporative ponds are to be located approximately 980 feet away from the nearest inhabited structure. Odor nuisance issues are not anticipated to result from the proposed evaporative ponds given their distance from nearest residences. Wastewater will be continually evaporated, and wastewater sludge will be removed periodically

to reduce the accumulated sludge necessary to maintain the required pond depth for operation. In addition, this well help to minimize the potentially odor contributing solids. The proposed evaporative ponds will be equipped with a bar screen for the influent wastewater flow. The perimeter of the evaporative ponds will be fenced with a chain link fence to prevent unauthorized access, protect wildlife from entering the ponds and protect the public from safety hazards. There are no expected long-term nuisances due to noise, dust, fumes, or vibration from the project.

SECTION 2.303 (14) AIR QUALITY

2.303 (14): *Description of the impacts and net effect that the Project would have on air quality during both construction and operation, and under both average and worst-case conditions, considering particulate matter and aerosols, oxides, hydrocarbons, oxidants, and other chemicals, temperature effects and atmospheric interactions.*

The proposed project is located in El Paso County which is outside of the Denver Metro North Front Range (DMNFR) EPA ozone nonattainment area. The proposed project is located approximately 50 miles outside of the DMNFR ozone nonattainment area administrative boundary.

1. No drilling is anticipated with the project. The contractor will be recommended to coordinate with the relevant electric utility provider for power at the site in place of generators.
2. Venting or flaring natural gas is not applicable to the proposed project. No gas wells will be involved with the project.
3. The project is not within the DMNFR. No gas or oil underground storage tanks will be involved with the project.
4. The contractor will be encouraged to implement as many of the recommended ozone mitigation measures as possible.
5. The applicant or proposed project will not contribute any significant oil or gas emissions after construction.
6. No hazardous or general chemicals will be used for the operation of the proposed facility that would require the use of firefighting foams or alternatives.
7. The proposed project has considered the potential for disproportionate environmental health impacts on specific communities. No such disproportionate impacts to any such communities are anticipated from the proposed project. The project should provide a net benefit to the surrounding community and environment as it eliminates a known source of wastewater contamination and replaces it with a non-discharging facility.
8. Public outreach and public hearings have been held within the community to ensure the meaningful involvement of disproportionately impacted communities. The applicant will provide the opportunities to discuss directly with the communities in the project area so that they may better understand community perspectives on the project.
9. The proposed project has considered substantive measures to avoid, minimize, and mitigate impacts to disproportionately impacted communities. The proposed facility is to be located as from the public as feasibly and economically possible. The project is to implement measures to reduce and minimize impacts to air, water, soil, noise, light, or odors where possible. For the proposed project, impacts to odors will be minimized by the use of carbon canister filters on all wastewater tanks and vaults. Impacts to water, both surface and ground water will be reduced with the elimination of the existing, unlined wastewater lagoon and its replacement with lined, non-discharging evaporative lagoons.

During construction, there will be temporary and typical impacts to air quality. These temporary impacts include but are not limited to equipment exhaust emissions, dust, and other chemical fumes. These impacts will be localized to the project site and will not have a permanent measurable effect on the air quality. Operation of the lift station will not produce measurable negative effects to the air quality.

SECTION 2.303 (15) VISUAL QUALITY

2.303 (15): *Description of the impacts and net effect that the Project would have on visual quality, considering viewsheds, scenic vistas, unique landscapes or land formations within view of the Project area.*

The project will not change the visual quality of the project area because only the top of the lift station with vents and a control panel will be visible. The perimeter of the evaporative ponds will be fenced with a chain link fence to prevent unauthorized access, protect wildlife from entering the ponds and protect the public from safety hazards. The perimeter around the lift station will be fenced off with a 6-foot chain link fence to prevent unauthorized access and eliminate any potential safety hazards to the public. The top of the embankments of the evaporative ponds and the perimeter fencing will be visible from E Ramah Road but are not expected to significantly change the visual quality of the area as it is surrounded by agricultural land and existing barbed-wire fence. There are no known scenic vistas, unique landscapes, or land formations that will be impeded by the project.

SECTION 2.303 (16) SURFACE WATER QUALITY

2.303 (16a): *Map and/or description of all surface waters relevant to the Project, including description of provisions of the applicable regional water quality management plan, and NPDES Phase II Permit and necessary El Paso County Erosion and Stormwater Quality Control Permit ("ESQCP"), Section 404 Federal Clean Water Act Permit that applies to the Project and assessment of whether the Project would comply with those provisions.*

The two surface water bodies near the project area are the Big Sandy Creek and Antelope Creek. These surface waters are not relevant to the project area because the proposed project will result in a non-discharging evaporative pond treatment facility. The applicable regional water quality management plan is administered by the Upper Big Sandy Ground Water Management District. Applicable provisions set forth by the Upper Big Sandy Ground Water Management District Rules, Regulations and Guidelines dated June, 2009 includes Rule 17, Water Quality, which states ‘For the purpose of conserving, preserving, and protecting the groundwater within the district and to ensure that water quality within the District is maintained within the limits established by Colorado State Agencies and Departments having jurisdiction over such matters, all wells and water delivery systems within which foreign matters are added to the water shall be equipped with proactive devices which prevent such foreign matters from entering the groundwater aquifer at any time through the well. Such protectives shall be maintained in proper working conditions at all times. For the purpose of this rule, “foreign matters” shall include, but not be limited to, fertilizers, pesticides, herbicides, and other agricultural chemicals, landfills, plant disposals, sewage, water treatment materials’

As the proposed project in Ramah involves the introduction of “foreign matters” to municipal water supply via sewage as defined by the district, the provisions for water quality set forth by the district apply to this project. The proposed project shall comply with these provisions as the evaporative pond design includes a double layer of synthetic liner around each of the ponds, preventing any foreign matters from the sewage entering the groundwater aquifer. Additionally, the operation of the ponds containment system, which is

the double layer of synthetic liners, shall be in proper working condition continuously for the entire operating life of the ponds. Similarly, for compliance with the district provisions set forth in Rule 17, the proposed lift station shall be designed to prevent any foreign matters from entering the groundwater via its fiberglass wet well containment and emergency overflow and alarm system.

Although the town is not directly involved in discussions with the regional groundwater quality management entity, the proposed project is set to adhere to those local groundwater quality management provisions described above. Furthermore, the project is set to improve groundwater quality in the area around Ramah and the Big Sandy Creek and Antelope Creek with the decommissioning and replacement of the existing wastewater lagoon used in the town's wastewater treatment system. Replacing this lagoon with the three proposed evaporative ponds will improve groundwater quality because the existing lagoon is known to be leaking into the ground as it is unlined and exceeds its useful design life.

The town is generally involved with regional water quality and environmental management as a participating member of the Pikes Peak Area Council of Governments (PPACG). All site applications for wastewater projects in the town are reviewed and governed by the PPACG in addition to the state and county level reviews. Since the construction area for the project will be greater than 1 acre, a Stormwater Management Plan will be completed as part of this project. Additionally, an El Paso County Erosion and Stormwater Quality Control Permit will be applied for by the selected contractor for the project.

2.303 (16b): *Existing data monitoring sources.*

There are no known data monitoring sources.

2.303 (16c): *Descriptions of the immediate and long-term impact and net effects that the Project would have on the quantity and quality of surface water under both average and worst-case conditions.*

The two surface water bodies near the project area are the Big Sandy Creek and Antelope Creek. These surface waters are not relevant to the project area because the proposed project will result in a non-discharging evaporative pond treatment facility. The project will deploy preventative measures for any impacts to the surrounding environment, surface and groundwaters through emergency overflow containment, alarms, and pond containment via double layer synthetic liners. Since there are no surface waters relevant to the project, there are no immediate or long-term impacts and net effects that the project would have on the quantity and quality of surface water.

SECTION 2.303 (17) GROUNDWATER QUALITY

2.303 (17a) *Map and/or description of all groundwater, including any and all aquifers relevant to the Project. At a minimum, the description should include:*

- (i) *Seasonal water levels in each portion of the aquifer affected by the Project.*

A geotechnical evaluation was completed by Kumar & Associates, Inc. on March 16, 2022. The report is attached in Exhibit O. According to the geotechnical report, groundwater was encountered at the proposed lift station location both during drilling and when measured again six days later. The water depth at the time of the final reading was 15.3 feet below the ground surface. No groundwater was encountered at the two borings at the proposed ponds

site. However, it was noticed that perched surface water may occur within the sands above less permeable clays, particularly after precipitation events.

(ii) Artesian pressure in said aquifers.

Artesian pressures were not observed during the geotechnical evaluation.

(iii) Groundwater flow directions and levels.

Groundwater flow and direction were not determined in the geotechnical evaluation because groundwater was only encountered at a single boring location. Based on the watershed of the local area, groundwater flows would be anticipated to travel to the northwest in the direction of the Upper Big Sandy Creek watershed. The project is not anticipated to affect the groundwater flows or directions.

(iv) Existing aquifer recharge rates and methodology used to calculate recharge to the aquifer from any recharge sources.

An aquifer recharge rate was not observed in the project area. It is not anticipated that the project will impact storage capacity for aquifer recharge.

(v) For aquifers to be used as part of a water storage system, methodology and results of tests used to determine the ability of the aquifer to impound groundwater and aquifer storage capacity.

No aquifers will be used as part of a water storage system for this project.

(vi) Seepage losses expected at any subsurface dam and at stream aquifer interfaces and methodology used to calculate seepage losses in the affected streams, including description and location of measuring devices.

The project is not anticipated to come in contact with or affect any subsurface or stream-aquifer interfaces.

(vii) Existing groundwater quality and classification.

The groundwater in the area is EPA Class II – Potential or Current Drinking Water.

(viii) Location of all water wells potentially affected by the Project and their uses.

A map of the wells within a 1-mile radius of the project is attached in Exhibit P. The closest well to the project is approximately 460 ft from the proposed lift station.

2.303 (17b): *Description of the impacts and net effect of the Project on groundwater.*

There is no anticipated negative impact from the project on groundwater. The project will improve the groundwater in the area by decommissioning the existing wastewater treatment lagoon, which will eliminate the suspected seepage of untested treated wastewater through the lagoon.

SECTION 2.303 (18) WATER QUALITY

2.303 (18a): *Map and/or description of existing stream flows and reservoir levels relevant to the Project.*

The project is not anticipated to affect existing stream flows or reservoir levels.

2.303 (18b): *Map and/or description of existing minimum stream flows held by the Colorado Water Conservation Board.*

There are no known Colorado Water Conservation Board studies that discuss minimum stream flows for the project area.

2.303 (18c): *Descriptions of the impacts and net effect that the Project would have on water quantity.*

The project is not anticipated to have any effect on water quantity.

2.303 (18d): *Statement of methods for efficient utilization of water, including recycling and reuse.*

No water will be utilized for the project.

SECTION 2.303 (19) FLOODPLAINS, WETLANDS, RIPARIAN AREAS, TERRESTRIAL AND AQUATIC ANIMALS, PLANT LIFE AND HABITAT

2.303 (19): *Applicant shall only provide description of foregoing natural conditions, animal and plant life at, but not to exceed, the level of detail required by other federal or state Permits or reviews which are applicable to the Project.*

The FEMA FIRM map, the wetlands map, and the IPaC resource list are attached in Exhibits Q, R and S respectively.

As shown in the FEMA FIRM map, the proposed project is to be located primarily outside of the existing 100-year and 500-year floodplains. The exception is the proposed decommissioning of the existing wastewater lagoon which is located within the 100-year floodplain north of the town. As described in detail in other sections of this application, the decommissioning will consist of removing the wastewater and accumulated sludge from the pond and disposing it at an approved disposal site. The former lagoon footprint will then be regraded and restored to match the surrounding floodplain and return the area to its natural condition before it was used as a lagoon. The removal of the existing wastewater lagoon will therefore have a net positive impact on the surrounding floodplain because it will eliminate the existing wastewater pond and its seepage into the ground and restore the area to the natural condition of the floodplain. This will be a benefit to surrounding groundwater and surface water quality as well as the adjacent riparian habitat of cottonwood trees and the other shrubs, grasses and forbs that thrive in the areas like the Big Sandy Creek next to the existing pond. The remaining portions of the proposed project will not impact or be located within floodplains including the proposed lift station, force main and evaporative ponds.

The project will not take place in or near or wetlands. Based on the wetlands inventory map from the U.S. Fish and Wildlife Service, two types of wetlands exist in the area around Ramah: Riverine Wetlands and Freshwater Pond Wetlands. Based on the map, the closest wetlands to the proposed project area are at the existing wastewater lagoon that is to be decommissioned. The existing lagoon appears to be classified

as Freshwater Ponds Wetlands. However, that pond is actually an existing wastewater lagoon that poses an environmental and public health risk because of its seepage into surrounding groundwaters and soils. Directly adjacent to the existing wastewater pond, is the Big Sandy Creek and the surrounding riparian zone. This riparian zone and the creek are classified as Riverine Wetlands according to the U.S. Fish and Wildlife wetlands inventory map. There is strong potential for the existing wastewater lagoon to be negatively impacting that area and wetlands due to the contamination from wastewater seepage. The proposed project in which the existing lagoon is removed and restored to the natural condition of the surrounding floodplain will have a net positive impact to the surrounding Riverine Wetlands. No other wetlands will be impacted from the proposed project as the proposed lift station, force main and evaporative ponds will not be located in or adjacent to any documented wetlands. The nearest shown wetlands to the proposed evaporative ponds are Freshwater Pond Wetlands located approximately 650 feet away to the east on the opposite side of the existing unnamed creek. The nearest shown wetlands to the proposed lift station and force main locations are Riverine Wetlands around the Big Sandy Creek approximately 650 feet to the northeast.

According to the IPaC resource list, there are 2 endangered species, 4 threatened species, and 1 proposed threatened species in the planning area. The endangered species include the Gray Wolf (mammal) and Pallid Sturgeon (fish). The threatened species include the Eastern Black Rail (bird), the Piping Plover (bird), Greenback Cutthroat Trout (fish), and Ute Ladies-tresses (Flowering Plant). The candidate species includes the Monarch Butterfly (insect).

The Gray Wolf is not anticipated to be impacted from the proposed project. According to the IPaC report, this species only needs to be considered for potential impacts if the proposed activity includes a predator management program which the proposed project does not.

The Pallid Sturgeon is not anticipated to be impacted from the proposed project. This species only needs to be considered for potential impacts if the project includes water-related activities and/or use in the North Platte, South Platte, and Laramie River Basins. The town of Ramah and the project location are not located within any of those basins, therefore no impacts to the Pallid Sturgeon are anticipated.

The Eastern Black Rail is not anticipated to be impacted from the project. There is no critical habitat listed for this species. This species is typically found in salt, brackish, and freshwater wetlands, and marshes in the eastern United States (east of the Rocky Mountains). The species typically inhabits densely vegetated, marsh areas where there is abundant overhead cover. The proposed areas of construction for the project will not be located in or near any areas of marshes with dense, overhead vegetation where this species is likely to be present. The presence of this species in the project area is highly likely and therefore impacts to it are not anticipated.

The Piping Plover is not anticipated to be impacted from the project. The proposed project location was not listed within or to overlap the critical habitat for the Piping Plover according to the species list from the IPaC report. This species only needs to be considered for potential impacts if the project includes water-related activities and/or use in the North Platte, South Platte, and Laramie River Basins. The town of Ramah and the project location are not located within any of those basins, therefore no impacts to the Piping Plover are anticipated.

The Greenback Cutthroat trout is not anticipated to be impacted from the project. The Greenback Cutthroat are cold water fish belonging to the trout, salmon, and whitefish family. The original range of the species is not known due to its rapid decline in the 1800s though it is assumed that it used to include all

mountain and foothill habitats south of the South Platte and Arkansas River drainage system. The range may have extended as far east as Greeley, Colorado though today it is suspected to remain closer to the eastern side of the continental divide. This species inhabits cold water streams and lakes and requires clear, cold and well oxygenated water. Although a portion of the proposed project will occur within the vicinity of the Big Sandy Creek, this is not the cold-water habitat typically inhabited by the species such as in colder mountain streams and rivers. In addition, Ramah and the proposed project location are farther east than the species historic range is believed to have extended. Therefore, based on the species profile in the IPaC report and the eastern location of the project, impacts to the species are not anticipated.

Impacts to the Monarch Butterfly are not anticipated from the project. The monarch is listed as a candidate threatened species. Monarch Butterflies can reside in temperate climates, such as eastern and western North America, undergo long-distance migration, and live for an extended period of time. In the fall, in both eastern and western North America, monarchs begin migrating to their respective overwintering sites. This migration can take monarchs distances of over 3,000 km and last for over two months. In early spring (February-March), surviving monarchs break diapause and mate at the overwintering sites before dispersing. The same individuals that undertook the initial southward migration begin flying back through the breeding grounds and their offspring start the cycle of generational migration over again. Colorado is not the typical region for the butterfly's critical, overwintering habitat, which is typically further south in areas with warmer, more mild winter climates such as in Mexico. No impacts to the Monarch Butterfly are therefore anticipated as a result of the proposed project.

No impacts to the Ute Ladies-tress are anticipated as a result of the proposed project. Ute ladies-tresses is a perennial herb with upright glandular-pubescent stems 12-60 cm tall arising from tuberous-thickened roots. The plant has a 3-15 cm long spike of numerous small white or ivory-colored flowers arranged in a gradual spiral. The species occurs in Colorado, Idaho, Montana, Nebraska, Nevada, Utah, Washington, and Wyoming. The species is known to be primarily in moist meadows associated with perennial stream terraces, floodplains, and oxbows at elevations between 4300-6850 feet. Surveys since 1992 have expanded the number of vegetation and hydrology types occupied by Ute ladies-tresses to include seasonally flooded river terraces, sub irrigated or spring-fed abandoned stream channels and valleys, and lakeshores. Some populations have been discovered along irrigation canals, berms, levees, irrigated meadows, excavated gravel pits, roadside barrow pits, reservoirs, and other human-modified wetlands. Over one-third of all known Ute ladies-tresses populations are found on alluvial banks, point bars, floodplains, or oxbows associated with perennial streams. According to the species profile in the IPaC report, the species current range in Colorado is limited to central and northern locations along the foothills east of the continental divide and in the northwest corner of Colorado. This range does not overlap the proposed project area. Furthermore, the prime habitat of the species is centered around perennially wet and or submerged marches and floodplains. This excludes the habitat for the majority of the proposed project locations with the exception of the existing wastewater lagoon that is to be removed which is located in the 100-year floodplain. The presence of the species is highly unlikely in the majority of the proposed project area and unlikely in the proposed work area in the existing 100-year floodplain given its distance from the species known range.

In addition to the listed species, no critical habitats were found at the project location.

SECTION 2.303 (20) SOILS, GEOLOGIC CONDITIONS AND NATURAL HAZARDS

2.303 (20a): *Map and/or description of soils, geologic conditions, and natural hazards including but not limited to soil types, drainage areas, slopes, avalanche areas, debris fans, mud flows, rockslide areas, faults and fissures, seismic history, and wildfire hazard areas, all as relevant to the Project area.*

According to the NCRS Soil map of the area, which is included as Exhibit M, the area around the proposed lift station site is mostly Nunn clay loam. The area around the proposed evaporative pond is comprised mostly of Manzanst clay loam and Terry-Razor complex. The soils in the area around the pond are considered suitable for agriculture and the land was previously used for agricultural production prior to the Town acquiring the parcel for the proposed evaporative ponds.

Resources for Colorado hazard classifications were reviewed for potential hazard threats to the proposed project site. The location was reviewed for risks to flooding, earthquakes, fires, snow, land and rockslides and avalanches. The project, including the proposed lift station and evaporative ponds location, are located outside of the natural floodplain as documented in the FEMA FIRM Map included in Exhibit Q. To ensure the reduction of risk to flooding, the proposed evaporative pond embankments will be constructed 9 feet above the approximate elevation of the 100-year floodplain. The lift station site will be raised so that the final grade of the lift station structures sit at a minimum of approximately 2.0 feet above the approximate elevation of the 100-year floodplain. The 100-year floodplain base flood is delineated in the FIRM map in Exhibit Q; however, no base flood elevation is determined under the Flood Zone A classification of the surrounding floodplain in Ramah. From the survey of the proposed project area, the elevation of the 100-year floodplain was delineated to be approximately 6087 ft above sea level.

The project was reviewed for potential burn probability using the Colorado State Forest Service Wildfire Risk Public Viewer. The area around the project location was shown to be in a low to moderately low burn probability area. Wildfire risk is relatively low and unlikely for the project area but does remain a serious low probability threat, much like the rest of the eastern Colorado plains. See Exhibit FF El Paso County Burn Probability Map.

Reviewing for avalanche hazard risk, the Colorado Avalanche Information Center (CAIC) showed that there has only been one recorded avalanche fatality in El Paso County since 1950-1951. Most avalanche fatalities are the result of backcountry recreationists traveling the steep mountain slopes of Western Colorado. Given the relatively dry and flat geography and the location in the eastern plains region of the state, the threat from avalanche and other snow hazards are very low in the proposed project area.

The project location was also reviewed for potential hazards due to earthquakes and seismic activity. The Colorado Geologic Survey was review for its Earthquake and Fault Map Viewer that showed there are known fault locations and recorded earthquakes that have occurred in El Paso County including the Ute Pass Fault Zone and the Rampart Range Fault Zone. See Exhibit KK for the Colorado Seismic Hazard Map. These faults as well as the recorded earthquakes are on the far western edge of the County and approximately 50 miles from the proposed project site. Reviewing the USGS long-term seismic hazard map for Colorado, the area around the proposed project location is categorized as the second lowest to third lowest for seismic hazards.

The project location was also reviewed for potential hazards to rockfalls and landslides. The Colorado Geologic Survey Rockfall Event Map shows that there are no known rockfall events near the proposed project location. It also shows there are no areas near or in the proposed project area with slopes greater

than 30 degrees, the slopes at which rock and landslides have a significantly higher chance of occurring. Given the distance away from any steep slopes and the relatively flat topography of the area around the proposed project site, potential for rockfalls and landslides is low.

The project location was also reviewed for potential hazards from wind. Wind hazards in Colorado take three forms: high wind, severe thunderstorms, and tornadoes. High winds are wind events with sustained wind speeds of 40 mph or greater lasting for one hour or longer, or winds of 58 mph or greater for any duration according to the National Weather Service. Tornadoes are a localized, violently destructive windstorm occurring over land. Tornadoes are generated by severe thunderstorms. Tornadoes in Colorado are most frequent in the spring and early summer when warm, moist air from the Gulf of Mexico collides with cold air from the polar regions to generate severe thunderstorms. These thunderstorms often produce the violently rotating columns of wind known as funnel clouds. A severe thunderstorm is a storm that produces winds of at least 58 mph, hail and or a tornado. Structural wind damage may imply the occurrence of a severe thunderstorm.

High wind events in Colorado are most common along the Front Range and in the northeastern counties. The primary threat of tornado is east of the Continental Divide along the Front Range and foothills. Adams, Weld and Washington counties have experienced the most tornadoes between 1950 and 2010. Most of the tornadoes that occur in the region are relatively small and short lived, though occasionally strong tornadoes have been reported. Though thunderstorms are still relatively infrequent along the front range and eastern plains, thunderstorms are quite prevalent in the Eastern Plains and along the eastern slopes of the mountains. Thunderstorms can still spawn the super cells that can have tornadoes or hail embedded in them. Given Ramah's location in the high, central Eastern Plains of the state, the proposed project location is a moderate area for risk to wind hazards.

The proposed project location was also reviewed for hazards to severe winter storms and snow. A winter storm is defined as a prolonged event involving snow or ice. All areas of Colorado are vulnerable to the adverse impacts of severe winter weather. Average snowfall is 72 inches or greater in the central and western areas of the state. In El Paso County, high snowfall averages is also true for the far western and mountainous areas although as it moves further east and lower in elevation the chances and totals for snowfall intensity diminishes. While blizzards are less frequent and drop less snow in areas further east, such as in Ramah on the high Eastern Plains, they can still be significant and hazardous. The average annual snowfall for Colorado Springs is approximately 39 inches per year according to the Western Regional Climate Center. The likelihood for severe winter weather in and around the proposed project location is moderate.

2.303 (20b): *Descriptions of the risks to the Project from natural hazards.*

As described above, there are no anticipated impacts from known natural hazards that pose a risk to the project.

2.303 (20c): *Descriptions of the impacts and net effect of the Project on soil and geologic conditions in the area.*

There are no known impacts to the soil and geologic conditions because of the project. The project, including the proposed lift station and evaporative ponds location, are located outside of the natural floodplain as documented in the FEMA FIRM Map included in Exhibit Q. To ensure the reduction of risk to flooding, the proposed evaporative pond embankments will be constructed 9 feet above the approximate

elevation of the 100-year floodplain. The lift station site will be raised so that the final grade of the lift station structures sit at a minimum of approximately 2.0 feet above the approximate elevation of the 100-year floodplain. The 100-year floodplain base flood is delineated in the FIRM map in Exhibit Q; however, no base flood elevation is determined under the Flood Zone A classification of the surrounding floodplain in Ramah. From the survey of the proposed project area, the elevation of the 100-year floodplain was delineated to be approximately 6087 ft above sea level.

Information on subsurface conditions was obtained by conducting a site reconnaissance and drilling three exploratory borings at the approximate locations shown in the Geotechnical Engineering Study report conducted by Kumar and Associates dated April 22, 2022. This report is included in Exhibit O. Borings 1 and 2 were drilled at the site of the proposed evaporation ponds. Below a layer of topsoil, the subsurface soil profile at this location consisted of clayey sands extending to a depth of about 2½ feet underlain by a layer of lean clay with varied amounts of sand, followed by discontinuous layers of clayey sand and well graded sand with silt extending to the maximum depth explored of 20 feet. Based on vertical expansion ranging from about 3.4 to 5.7 percent upon wetting under a surcharge pressure of 1,000 psf, the clays in this area possess a moderate to high swell potential.

Boring 3 was drilled at the site of the proposed lift station. Below a layer of vegetated topsoil, the subsurface soil profile at this location consisted of man placed fill extending to a depth of about 6 feet and underlain by clayey sand extending to a depth of 9½ feet. Well graded sand was found below the clayey sand, and extended to a depth of about 27 feet, where it was underlain by a layer of sandy lean clay. The clay layer was relatively thin and was underlain by clayey sand from 29 feet to the maximum explored depth of 30 feet. The fill tested did not appear to possess a significant swell potential based on a vertical expansion of 0.2 percent upon wetting under a surcharge pressure of 1,000 psf.

Existing fill was encountered to a depth of about 6 feet at the location of the proposed lift station. The lateral or vertical extents of the fill were not determined in the scope of the study, but the base of the lift station will be about 12 feet below the ground surface, and the existing fill is not likely to be a factor for the design of shallow foundations. In all cases, fill will be removed and replaced with suitable material where it is present below foundations. Alternatively, foundations extending to native soils or deep foundations may be considered for the lift station. Groundwater was measured at a depth of about 15.3 feet in the boring drilled for the proposed lift station measured six days after drilling. This depth is near the elevation of the base of the lift station, and groundwater may be a construction consideration. Therefore, ballasting will be used on both the proposed influent lift station vault and the sewer overflow tank. Both structures will be constructed of fiberglass. Ballasting will assume observed groundwater levels observed in the geotechnical report rise an additional 5 feet to a depth 10.3 feet below the ground surface to be conservative.

Import fill, if required at the lift station site, will consist of a minus 2-inch non-expansive soil having a maximum 35% passing the No. 200 sieve and a maximum plasticity index of 15. New fill will extend down from the edges of the foundations at a minimum 1:1 horizontal to vertical projection. The estimate total settlement for shallow foundations designed and constructed as discussed in for the lift station will not exceed approximately 1 inch. Existing fill, or areas of loose material encountered within the foundation excavation will be removed and the footings extended to adequate natural bearing material.

The subsurface soil profile at the location of the proposed evaporation ponds included a clay zone from about 2½ feet to 9½ feet below the existing ground surface. The clays tested had a moderate to high swell potential upon wetting and are anticipated to have a relatively low permeability. While these soils are

believed to probably work well for use as evaporative ponds, the construction of shallow foundations at this location will be difficult due to the swell potential. No such shallow foundations in the existing subgrade are proposed for the evaporative ponds. All structures proposed at the evaporative ponds, including the influent flow splitter structure and influent bar screen, will be constructed on the top of the pond berms which are to be regraded. If the existing material used for the berms is not suitable for foundations of these structures, fill will be used to replace that material to the depth needed for the placement of the structures.

The estimated shear wave velocities for the subgrade materials encountered based on standard penetration testing, indicated a design Site Class D per the International Building Code (IBC). Based on the subsurface profile and the anticipated ground conditions, liquefaction is not a design consideration for the proposed ponds or lift station.

SECTION 2.303 (21) HAZARDOUS MATERIALS

2.303 (21a): *Description of all solid waste, hazardous waste, petroleum products, hazardous, toxic, and explosive substances to be used, stored, transported, disturbed or produced in connection with the Project, including the type and amount of such substances, their location, and the practices and procedures to be implemented to avoid accidental release and exposure.*

The lift station will collect all of the wastewater from the town collection system, which is currently estimated to be an average of 11,203 gpd. With the 20-year projection, it is estimated that the average flow into the lift station will be 12,855 gpd. To be conservative and account for the lack of existing metering to know the true existing average day flow, the peak hour flow rate for the lift station was based on the proposed permitted hydraulic limit of 15,000 gpd. Multiplying that flow by 4 to get the peak hour flow, results in a peak hour flow of 60,000 gpd (42 gpm), which is what the lift station is designed for. In order to minimize the occurrence of accidental release of raw wastewater, the proposed lift station will be equipped with pump failure and high-water alarms. There will be an audible alarm siren and visual alarm light that will activate to alert and draw attention in the surrounding area when an alarm is triggered. The town has dedicated 24-hour on-call staffing that will quickly respond to emergencies or alarms. In addition to the alarms, a 6,000-gallon tank which equates to 2 hours of storage at the peak hour flow rate, will be used as overflow storage. In order to provide a minimum of 2 hours of peak hour flow or 8 hours of average day flow, the required overflow storage is 5,040 gallons. Therefore, the proposed overflow tank will be capable of holding up to 2.4 hours of peak hour flow if necessary.

2.303 (21b): *Location of storage areas designated for equipment, fuel, lubricants, and chemical and waste storage with an explanation of spill containment plans and structures.*

Currently, all equipment for both the water and wastewater systems are stored at the town well maintenance shed, which is located on South Commercial Street adjacent to the elevated water storage tank. This allows for easy access to any necessary equipment in case of a mechanical failure at the lift station. There are no chemicals that are needed to operate the project, so no chemicals need to be stored for the operation of the proposed project components including the proposed ponds and lift station. All necessary spare mechanical parts for the lift station pumps and or piping appurtenances will be stored at the existing well maintenance shed.

Temporary staging and storage areas for the construction of the lift station and evaporative ponds have been designated on the construction plans. The staging areas are shown in the attached figures included in Exhibit GG with this submittal. The proposed staging area for the lift station construction will be located

on the open plot of land adjacent to the intersection of Rock Island Ave and Pikes Peak Ave. This is an undeveloped parcel owned by the town. This location is relatively flat and easily accessed from the lift station location. This location will likely be used for staging pipe for the force main and structures and any necessary subgrade fill for the lift station. As shown on the staging plan, erosion control and sedimentation measures will be placed around the staging area conforming to the best management practices (BMPs) for erosion and sedimentation control. This location should not pose any major disruptions to local traffic or residences as it is a currently open and unused plot of land owned by the town and will not restrict any surrounding residences access. Following the completion of the construction, the storage and staging area at this location will be restored using a recommended native seed grass mix stabilized as necessary to prevent erosion or runoff until vegetation has been reestablished. This location may be used for some of the decommissioning and removal of the existing wastewater lagoon and septic tank. Temporary storage of equipment may be used at the existing wastewater lagoon, but no storage of fill materials will be placed at the existing lagoon in the floodplain.

For the evaporative ponds construction, all necessary storage and staging for the ponds construction will be located at the proposed site for the ponds. The proposed staging area for the ponds site is in the northeast corner of the parcel adjacent to the existing access road into the site from East Ramah Road. The exact location and size of this storage and staging area may vary during construction but will be in this approximate location and will be roughly 300 feet by 400 feet. This location will keep it out of the way from the ponds construction and provide an adequate buffer (approximately 300 feet) from the perennial stream bed to that runs north to south at the far edge of the property site. All necessary erosion control and sedimentation measures will be deployed at the ponds site during construction and restoration including around the storage and staging area to ensure no runoff impacts to the nearby stream bed. Following completion of the project construction, the disturbed areas of the site will be restored with a recommended native grass seed mix and stabilized until permanent vegetation is established. This staging area may also serve as a laydown area for pipe materials for the proposed force main installed near this portion of the project on East Ramah Road. This staging area will be accessed from the existing access road on East Ramah Road shown on the staging area figure.

SECTION 2.303 (22) MONITORING AND MITIGATION PLAN

2.303 (22a): *Description of all mitigation that is proposed to avoid, minimize or compensate for adverse impacts of the Project and to maximize positive impacts of the Project.*

- (i) *Describe how and when mitigation will be implemented and financed.*

The design of the lift station takes steps to minimize potential wastewater spills. The lift station will be equipped with a portable generator quick-connect that will allow a portable generator to be hooked up to the lift station in case there is a loss of power. Emergency storage for more than 2 hours of peak hour flow or 8 hours of average day flow is also provided. The town has access to portable pumps and generators in case of a mechanical or electrical failure. The evaporative ponds wastewater treatment facility is sized for the maximum day flow with a high-water line depth of 3 feet. The total depth of the pond is 5 feet which leaves 2 feet of freeboard as buffer for any emergency periods of high flows and precipitation. The 3 ponds will also be constructed with overflow piping connecting each pond such that any high flows approaching the high-water line will be dispersed among all three ponds. This ensures the 2 feet of freeboard will always be kept across each pond. In addition to overflow protection measures, the ponds will be constructed with a double layer of synthetic liners, preventing any possible seepage, and leaking into the subsurface.

Access to the lift station and evaporative pond site will be limited to approved staff members of the town to limit adverse impacts to the public.

(ii) *Describe impacts that are unavoidable that cannot be mitigated.*

There are no known unavoidable impacts.

2.303 (22b): *Description of methodology used to measure impacts of the Project and effectiveness of proposed mitigation measures.*

Any spill at the lift station or evaporative ponds facility will be reported to CDPHE. Refer to the Site Application located in Exhibit I for more information.

The town and wastewater staff will have all necessary emergency agency contacts on hand at all times for quick contact and coordination should any spill or emergency at the facility arise. This includes the Big Sandy Fire Protection District, El Paso County Sheriff's Office, and CDPHE Water Quality Control Division. In addition, potential emergency situations during construction are stipulated by the Contract Documents and Technical Specifications which require notification by the contractor to emergency response agencies of any activities that will affect the emergency agencies, and that emergency access must be maintained and allowed during all construction activities.

2.303 (22c): *Description, location and intervals of proposed monitoring to ensure that mitigation will be effective.*

The lift station will be equipped with pump failure and high-water alarms that will alert operations staff to emergency situations and/ or high wet well levels. Pumping equipment will include overcurrent and high temperature protection. An audible alarm siren and visual alarm light will activate to alert and draw attention in the surrounding area. The lift station discharge will be equipped with a magnetic flowmeter so that the town can track in real time the volume of flow being pumped to the evaporative ponds as well. The town has dedicated 24-hour on-call staffing that will quickly respond to emergencies or alarms.

SECTION 2.303 (23) ADDITIONAL INFORMATION

2.303 (23): *The Director may request that the applicant supply additional information related to the Project if the Director and/or the Permit Authority will not be able to make a determination on any one of the applicable Review Criteria without the additional information. Such additional information may include applicant's written responses to comments by a referral agency.*

This is noted and will be addressed as requested by the Director.