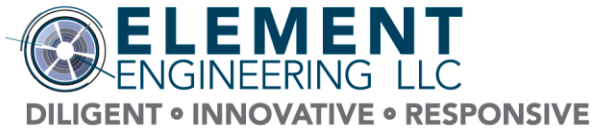


EXHIBIT MM – HISTORICAL REVIEW AND CORRESPONDENCE



April 18, 2022

Steve Turner
Office of Archaeology and Historic Preservation
History Colorado
1300 Broadway
Denver, CO 80203-2137

Subject **Town of Ramah Wastewater System Improvements
El Paso County, Colorado**

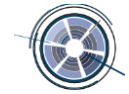
Dear Mr. Turner:

Element Engineering, LLC (Element) and the Town of Ramah (town) are in the process of performing an environmental review pursuant to the National Environmental Policy Act to assess the environmental impacts of wastewater improvements in El Paso County, Colorado. This letter is submitted to conduct an interdisciplinary review of the proposed project. The project shall be funded through Colorado Department of Public Health and Environment (CDPHE) with state dollars through CDPHE's state revolving Fund Program. This project is being reviewed under the State Register Act.

The town of Ramah owns and operates a municipal wastewater system that is currently not permitted by CDPHE or El Paso County. The Town of Ramah's Wastewater System Improvements Project is proposed to consist of the complete decommissioning of the existing facility and the construction of a new evaporative pond system and all associated equipment.

The existing wastewater lagoon facility is an unpermitted retention pond which is fed from an influent septic tank with an unknown hydraulic capacity. Note that influent monitoring data is not available as no influent flow monitoring equipment exists at the site. As such, there is no discharge monitoring report data for the existing wastewater facility. The existing facility sits within the 100-year floodplain, Flood Zone A and is to be removed of all existing biosolids and regraded back to the condition of the natural floodplain to the best extent possible. The existing influent septic tank will also be abandoned and removed as part of the proposed project.

The project proposes the replacement of the existing, undersized wastewater lagoon with a correctly sized, complete retention evaporative ponds wastewater treatment facility. The proposed facility will be constructed on existing town property, just south of the service area on East Ramah Road in a large open field that has previously been used for agriculture, primarily for hay. To properly hold and evaporate the town's estimated average daily waste flow, each pond will be approximately 2.8 acres in size, with the total evaporative ponds area comprising of 10 acres. Synthetic liners are to be installed at the bottom of each pond to ensure there is no seepage into the surrounding soils and groundwater. In addition to the ponds



and the synthetic liners, the project will require the construction of an influent lift station with a magnetic flow meter and approximately 4,600 feet of sewer force main.

The influent lift station will be in the service area to pump the flow from the town's existing collection system via the new force main south to the new evaporative pond facility. The proposed lift station will be located in the town right away along Pikes Peak Ave, approximately 200 feet southeast of the existing influent septic tank. The proposed lift station will consist of one influent sewer manhole that diverts flow from the collection system, the wet well containing the lift station pumps and associated piping and valves, and a third manhole structure that will contain the flow meter. The force main will exit the meter vault and run along town right of way following Pikes Peak Ave to Second St and then Chestnut St and a crossing of US HWY 24 and East Ramah Rd until reaching the proposed evaporative ponds. The proposed force main will maintain an approximate 5 feet of cover and will travel entirely within town and county right of way. Most of the proposed force main will be installed in streets with existing sewer and water utilities and will follow these previously disturbed corridors to the evaporative ponds. No utilities are known to exist on East Ramah Rd after the crossing with US HWY 24.

Details and locations of the proposed wastewater structures and force main alignment are displayed on the attached Proposed Improvement Exhibits that depicts the project's area of potential effect (APE) for all construction activities. The proposed force main within previously disturbed corridors and existing town and county right of way. The proposed lift station will be constructed adjacent to the roadway on Pikes Peak Ave, inside the town right of way. The proposed evaporative ponds will be constructed on town owned property, previously used for agriculture.

A site file search for all eligible or listed sites and historic districts, along with any surveys, within the proposed project area has been requested through History Colorado. Enclosed is the response letter stating that 8 sites and 3 surveys were in the designated area. Additional site information is submitted with this letter.

Element and the town request that your office reviews the enclosed maps and site file search results for any potential conflicts or issues that are apparent through the Colorado Historical Society concerning historical properties. The proposed project is not expected to impact any historic properties. We would appreciate a response within 30 days. If you need any further information or wish to discuss the project, please contact me at 303-518-2361 or by email at karld@elementengineering.net. Please respond to this letter by mail to the address in the footer of this letter or by email at karld@elementengineering.net



Sincerely,

A handwritten signature in black ink, appearing to read "Karl Duffield". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Karl Duffield, EIT
Design Engineer

Attachments

USGS Map
Proposed Improvements Exhibits
History Colorado Site File Search Result Letter & GIS Results



History Colorado

Karl Duffield
Element Engineering
12687 W. Cedar Dr. Ste 300 Lakewood CO 80228

April 12, 2022

Re: Town of Ramah WWTP Improvements (0043.0001)
File Search No. 24584

At your request, the Office of Archaeology and Historic Preservation has conducted a search of the Colorado Inventory of Cultural Resources based on your specified search criteria (the search area shown in the provided map), located in the following areas:

PM	T	R	S
6th	11S	61W	1
6th	11S	60W	6

8 sites and 3 surveys were located in the search area(s).

If any site, district, building, structure, object, or survey area was identified within the search area, a spreadsheet of detailed information* accompanies this letter. Our records may not represent all cultural resources in Colorado, nor can they be considered comprehensive, as most of the state has not been surveyed for cultural resources. There is the possibility that as yet unidentified cultural resources exist within the proposed impact area.

This letter is not considered formal consultation under Section 106 of the National Historic Preservation Act (36 CFR 800) or the Colorado Register of Historic Places (CRS 24-80.1). In the event that there is federal or state agency involvement, please note that it is the responsibility of the agencies to meet the requirements of these regulations.

We look forward to consulting with you regarding the effect of the proposed project on significant cultural resources in accordance with the Advisory Council on Historic Preservation regulations titled "Protection of Historic Properties" or the Colorado Register of Historic Places, as applicable (<http://www.historycolorado.org/consultation-guidance>).

If you have any questions, please contact the Office of Archaeology and Historic Preservation at (303) 866-3392. Thank you for your interest in Colorado's cultural heritage.

Dawn DiPrince
State Historic Preservation Officer

*Information regarding significant archaeological resources is excluded from the Freedom of Information Act. As such, legal locations of these resources must not be included in documents for public distribution.



History Colorado

Invoice #	00-314
Date	4/12/2022
Due	Net 30

Bill To
Attn: Accounts Payable Element Engineering 12687 W. Cedar Dr. Ste 300 Lakewood CO 80228

Request Reference	Requested By	Request Date
Town of Ramah WWTP Improvements (0043.0001) File Search # 24584	Karl Duffield	4/12/2022

Description	Amount
2 Sections Searched at \$30.00 per Section	\$60.00
<i>Thank you for your support!</i>	
Total Due \$60.00	

Payment can be made by credit card or check. Address check payments to "History Colorado" and include the invoice number on your remittance. Mail check to the address indicated below or call 303-866-3392 to make a credit card payment. Email hc_oahp@state.co.us if you have questions.



History Colorado

Karl Duffield, EIT
Design Engineer
Element Engineering LLC
12687 W. Cedar Drive, Suite 300
Lakewood, CO 80228

Re: Town of Ramah Wastewater System Improvements, El Paso County, Colorado (HC# 81356)

Dear Mr. Duffield:

We received your correspondence dated April 18, 2022 on April 19, 2022 initiating consultation with our office on the subject action pursuant to the Colorado State Register Act – Colorado Revised Statute (CRS) 24-80.1 et. seq.

A search of our database indicates that eight previously identified cultural resources (5EP.379, 5EP.1046, 5EP.1815.1, 5EP.3575, 5EP.4969, 5EP.6813, 5EP.7100, and 5EP.7101) are within or near the area of proposed action. Site 5EP.1046, the First Presbyterian Church of Ramah ~ Ramah Town Hall, is the only property listed on the National Register of Historic Places. As such, our office has reviewed the scope of work and we concur with the finding of no adverse effect under Section 104 of the Colorado State Register of Historic Places Act for the referenced project.

Please note, as most of Colorado has not been inventoried for cultural resources, our files contain incomplete information. Consequently, there is the possibility that yet unidentified cultural resources exist within the proposed project area. If human remains are discovered during ground disturbing activities, the requirements under CRS 24-80 part 13 apply and must be followed. Should the current subject action change, please contact our office for continued consultation under CRS 24-80.1.

In the event that there is federal agency involvement, please note that it is the responsibility of the federal agency to meet the requirements of Section 106 as set forth in 36 CFR Part 800 titled “Protection of Historic Properties”. This includes not only reasonable and good faith identification efforts of any historic properties located within the area of potential effects, but determining whether the undertaking will have an effect upon such properties. The State Historic Preservation Office, Native American tribes, representatives of local governments, and applicants for federal permits are entitled to consultative roles in this process.

We thank you for the opportunity to comment. If we may be of further assistance, please contact Holly McKee-Huth, Cultural Resource Information/Section 106 Compliance at (303) 866-4670/holly.mckee@state.co.us.

Sincerely,

Patrick A. Eidman Digitally signed by Patrick A. Eidman
Date: 2022.05.05 12:03:59 -06'00'

Dawn DiPrince
State Historic Preservation Officer