

PROPOSAL
TO THE
U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION VIII, DENVER, COLORADO,
AND THE
OFFICE OF FEDERAL ACTIVITIES,
WASHINGTON, D.C.

TO DEMONSTRATE AN APPROACH
TO FULLY INTEGRATING THE
208 AREAWIDE PLANNING PROCESS
WITH THE NEPA PROCESS

AND

DOCUMENT THE EXTENT TO WHICH
ENVIRONMENTAL CONSIDERATIONS IMPACT
THE DECISION-MAKING PROCESS

PREPARED BY:
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201 EAST FOURTH STREET
LOVELAND, COLORADO

PREFACE

To fully appreciate the significant environmental, institutional, economic, and growth issues which face Larimer and Weld Counties and how the proposed demonstration project can have a positive impact on this Region, we recommend that the reader first review Appendix A.

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I. What is 208 to Larimer-Weld?

The 208 Areawide Waste Treatment Management Planning Process is unique in three respects: 1) it is the only environmental planning process in the history of the United States upon which Congress declared national policy; it is to provide a framework for decision making closest to those who are to be affected by those decisions; the process, which is continuous, is aimed towards local/regional implementation potentially resulting in the acceptance of responsibility by local government to both abate and prevent environmental pollution within its jurisdiction. The initial planning process embraces virtually every discipline of study including social sciences; economics and finance; governmental and institutional arrangements and interrelationships; politics; engineering; natural sciences; ecological, biological and other environmental sciences; population, demographics and land use. The 208 planning process could be viewed as the panacea of planning programs.

Perhaps the most significant and controversial aspect of "208" is that it can bring to the forefront of public and political consciousness the relationship between environmental pollution in all of its many forms, and land use; and, dramatize the need to make wise land use decisions to preserve, protect and enhance the quality of life and the environment. Congress, lacking a national land use policy, was indeed wise to choose water quality to raise this fundamental issue as water is that substance which touches every part of our lives.

Considerable debate could surround whether the 208 areawide planning process will have its greatest short and long term impact on large metropolitan/urban areas or less densely populated and less environmentally impacted areas which - because of these "assets" and other factors, such as energy development, are experiencing rapid economic growth and development.

The Larimer-Weld Region is such an area. The institutional barriers are not evident here as with most large metropolitan areas; there is still a sense of community and the climate is right to precipitate a broadening of the understanding by man of his environment so that these values can be protected. The Larimer-Weld COG views this process as one which can prevent problems now experienced by the Metropolitan Denver area to the south; problems which probably cannot be solved but perhaps checked by eliminating the internal combustion engine and rewriting the Constitution so that government has absolute control over land use -in other words the abolishment of private property rights and limitations on growth.

Freedom of movement and private property rights are two fundamental cornerstones of our nation. Therefore, the L-WCOG believes that question of protecting, preserving and enhancing the quality of life and the environment rests with education. The 208 process is, then, an educational process which must lead to an awareness and acceptance of the responsibility of the individual and society to keep its house in order.

II. What is NEPA to L-WCOG?

As with 208 areawide planning, the National Environmental Policy Act of 1969 (NEPA) is unique in that it is the first known law enacted by any society which mandates that environmental considerations be a part of the decision making process of government and that governmental agencies document in the form of Environmental Impact Statements (EIS) the extent of those considerations and circulate them widely for review and comment. While many understand the administrative review requirements of NEPA, there is still some confusion at the local level as to what the intent of the law is.

The fundamental requirements are that the responsible federal agency (EPA in this case) develop a draft and final EIS which discloses the full range of reasonable alternatives and their potential impacts on society and the natural environment; and that the agency follow a prescribed procedure of formal review of the draft statement by the public and other interested groups and governmental agencies; and, finally, the filing of the final impact statement with the President's Council on Environmental Quality (CEQ). CEQ does not judge or review these documents but acts in a clearinghouse or accounting capacity.

Congress was wise in not drafting a law upon which litigators could argue the adequacy of an Environmental Impact Statement (EIS). Six years of implementation of the National Environmental Policy Act, which requires impact statements, and countless legal suits, has upheld the intent of the law in that regard.

The rationale for judging not the adequacy but scope of an EIS is understandable. Impact statements are not an exact science. Although things are measured and costs of hardware are computed, much of what is contained in the statement is subjective in nature - or value judgments. There is not equal knowledge of all things covered in an EIS.

Additionally, there are an infinite number of alternatives and sub-alternatives which could be explored. Ideally, we should gather all the data needed and evaluate all alternatives - selecting among them that which would help build a perfect world. But this would be unrealistic as the time required would not only increase the cost of the decision, but perhaps never result in a decision.

Another important concept is that NEPA does not require that the most environmentally enhancing or, alternatively, the least environmentally damaging, course of action be followed; but that the decision be based upon reasonable understanding of the tradeoffs which are being made - environmentally, socially, historically, and economically. Thus the impact statement process becomes part of the decision making process.

The COG views that the value of NEPA lies in the process itself and the numbers and extent to which individuals from all persuasions are involved. It should facilitate the broadening of the perspective of these individuals and stimulate them to think in terms which were once thought of by them as either foreign or immaterial. The process, then, is educational.

III. What is the Relationship between 208 and NEPA?

The 208 areawide planning requirements include analysis in a broad range of social, economic, engineering, and environmental disciplines. Section 208 requires that the analysis be reflected in the environmental assessment format so that the 208 study results, conclusions, and anticipated impacts are clearly identified in the 208 plan. The COG, therefore, views the process of meeting of 208 requirements and NEPA requirements as synonymous.

The L-WCOG agrees with the EPA's position that the 208 plan - the result of the "process" - is the EIS and that the COG is an agent of the Federal Government. The constant monitoring of the process by the agency and by area residents will ensure the objectivity of the analysis.

There is a very strong impetus to seeing that the process is conducted objectively and in the public arena. Local or state dissenters or vested interest groups who disagree with certain plan provisions may use whatever tools are available to impede and frustrate the plan approval process. NEPA could be used as such a tool. The COG wishes to ensure that a meaningful 208 plan is adopted locally and accepted at the state and federal level which mandates the complete fulfillment of NEPA requirements.

IV. What are the Major Similarities and Problems Associated with NEPA and 208?

The most obvious similarity between the two are that they are educational processes. The significance of both requirements lies in the process by which the programs, plans, policies and decisions evolve. The final document is seldom a good measure of the effectiveness of the process. This often makes it difficult if not impossible for outside observers to make fair evaluation.

The 208 process has not yet run its course and it is premature to speculate on the quality of the plans as reflective of the process. Unfortunately, however, it is apparent that EIS seldom reflects the full scope of the decision making process and the extent to which environmental considerations impact those decisions. This poses a dilemma for both reviews of impact statements and for proponents of NEPA to vividly demonstrate the environmental "benefits" which have resulted from NEPA. For example, environmentalists fought for several years to block construction of the Alaska Pipeline. More than \$7 million was spent to meet NEPA requirements yet the project was approved for "economic" reasons. Many argued that the money spent on environmental studies was wasted. However, with NEPA and these studies, few of the safety features would have been designed, pass throughs for migratory animals would not have been provided, and construction materials and methods would not have been required which minimized adverse impacts.

To further complicate the matter, there has been an increasing trend with federal, state, and local government to hire out or "contract", the environmental impact statement/assessment. Consultants take on the responsibility of conducting the inventory and analysis on a day-to-day basis and assembling the document. This would appear to have

the effect of restricting the decision makers within the responsible agency to reviewing the rough-draft document which is assembled, for the most part, without their direct involvement. Therefore, their reactions and decisions are potentially prone to sway more according to public opinion and politics because of their peripheral involvement. The value of the process would appear to be necessarily diminished.

Due principally to time constraints, all one hundred forty-nine 208 Designated Areawide Planning Agencies are utilizing consultants to provide substantive analysis required of the program. The majority of 208 planning agencies are also seeking consulting services in the area of environmental impact analysis. Indeed, the consultant is being contracted to develop the environmental assessment statement.

The problems of administering such a unique interdisciplinary planning study, fraught with controversy and politics, are monumental. Perhaps the most difficult management task is to ensure, on a day-to-day basis, the effective coordination and innercommunication amongst and between 208 staff and consultants. However, it is often ill-understood by outside observers of a 208 program that delays and missed deadlines do occur and that the consultant is ultimately forced to act according to his overriding concern of meeting his contractual obligations within his budget. This widens the communication and coordination gap. If, as a result of such delays, the environmental impact analysis is conducted by consultants out of phase, it is doubtful that the full benefits of the NEPA process can be realized.

The problems of effectively communicating the program outputs are likewise monumental. The burden for ensuring involvement of elected officials rests with the planning agency staff. Recognizing the importance of bringing early into the 208 planning process the elected officials, the EPA is mounting a concerted effort to provide meaningful forums, in the form of workshops, for elected officials.

This is a commendable effort. However, the solution to the communications problem must be solved at the local level.

V. How Does the L-WRCOG Hope to Maximize the Educational Process and Fully Comply with the Intent of NEPA

The L-WRCOG wishes to avoid, where possible, coordination and communication problems which are inherent in broad interdisciplinary studies involving consultants, committees, elected officials, vested interest groups and the general public. It desires to fully integrate the NEPA process with the 208 process. In September, 1975, the COG elected to have its staff take the lead role in developing the impact assessment documentation. Broadly, this is to be carried out by utilizing the skills of the COG professional staff members, including an environmental engineer and natural resources planners, and draw upon substantive analysis prepared by consultants in the three general areas of study. The various expertise of the COG consultants will be drawn upon as well. Regional planners, economists, engineers, finance specialists and water quality experts from the consultant's staff will be continually providing input to the environmental assessment as the study

unfolds. Appendix B illustrates how COG will draw on these resources. The COG also intends to involve and draw upon federal, state and local bodies, university and environmental groups and the citizenry to guide and provide direct substantive and evaluative input into the process. A COG Governing Board Task Force comprised of three elected officials, will monitor the process and report at regular intervals to all members of the Governing Board. The 208 Subcommittee on Environmental Impact will act as the principle review body whose responsibility it will be to direct the COG staff in the objective assimilation and documentation of information, data, analysis and findings of consultants and other sources.

Finally, the environmental impact assessment process will be the principle communication tool of the 208 program outputs to the public. It is hoped that it will be a dynamic process which will allow, in fact, foster a constant exchange of attitudes, ideas, concern, and divergent opinions amongst and between the many diverse interest groups of the region.

VI. Proposed Demonstration Project

The L-WRCOG proposes a demonstration project whereby

1) the COG as an agent of the Federal Government, will develop the Draft and Final EIS as an integral part of the 208 Areawide Planning Process.

2) The COG will attempt to demonstrate that the NEPA process is most effectively carried out and complementary to the 208 Areawide Planning Process by taking the lead role in the day-to-day development of the environmental impact assessment documentation in lieu of outside consultant assistance.

3) The COG will attempt to demonstrate that the NEPA process is an effective communication tool with the general public for all aspects of the 208 process.

4) The COG will demonstrate by documented reporting at regular intervals, the extent to which environmental considerations impact the decision making process.

VII. Proposed Reporting Procedures

It is proposed that interim and final reports be prepared which document the degree to which the proposed demonstrations are achieved. COG believes that regular interim reporting is essential so that the EPA and other parties can closely follow the evolution of the process.

It is proposed that at six month intervals the COG Environmental Planner with the assistance of the COG 208 Director and under direct supervision of the L-WCOG 208 Subcommittee on Environmental Impact, will prepare and submit to EPA Region VIII and the Office of Federal Activities in Washington, D.C., a detailed progress report.

The report will contain at a minimum:

- . A listing of all meetings, workshops, and hearings which were conducted to discuss environmental issues.
- . An accounting of the numbers of persons in attendance and the interest they represent (agriculture, industry, Chamber of Commerce, urban resident, gentleman farmer, environmentalist, etc.)
- . A list of the issues identified by the Subcommittee and a narrative discription of the basis for positions taken by the various interests.
- . A narrative describing the way in which environmental issues were considered by consultants in analytical work.
- . A narrative describing the positions of elected officials (COG Governing Board members) taken on each issue as an influencing factor in decision making.
- . A narrative describing any notable changes in views, positions and perceptions of interest groups and elected officials from the previous reporting period.

It is also proposed that an independent environmental group be contacted on a direct expenses basis, to monitor the entire process and make similar but independent evaluation and reporting to the EPA. Such a group has been identified at UNC in Greeley and a qualified academian is willing to assume the responsibility for such an undertaking.

The COG recommends that the EPA identify another 208 areawide planning agency whose approach is to use consultants to prepare the impact assessment documentation, and whose strategy is not to utilize the NEPA process as the principle mechanism for public involvement. A similar evaluation and report process will lend to an objective comparison of the two approaches.

Timetable

February 2, 1976	Official Start Date, L-WCOG 208 Planning Process
December, 1976	First interim report
May, 1977	Second interim report
December, 1977	Delivery of locally adopted plan to State
December, 1977	Third interim report
February 1, 1978	EPA Region VIII in receipt of 208 Plan

Tentative

February, 1978	File draft EIS with CEQ
April, 1978	Public Hearing on Draft EIS
May, 1978	File final EIS with CEQ
June, 1978	Final report on Demonstration Project delivered to EPA

VIII. Work Plan and Approach

Appendix B of this proposal outlines, generally, the approach the COG intends to take to carry out this demonstration project. Further refinements will be made with EPA input as well as that from the 208 Subcommittee on Environmental Impact. The important feature is that the environmental assessment is a dynamic process and the documentation will evolve with direct public input.

IX. Funding and EPA Coordination

To successfully carry out the demonstration project, additional funding and a special coordination arrangement will be necessitated. The COG requests that an individual be assigned from the Region VIII and OFA offices to monitor, participate and provide policy guidance in this program. We feel that close coordination between the COG and these two offices is essential to the successful outcome of the demonstration project. The amount of funding requested is \$134,478.

These funds reflect that which is needed beyond available 208 and local funding to ensure the adequacy of the impact assessment as well as credibility with local environmentalists. We would consider items 1, 2, and 3 as priority items and in that order. Immediate funding for item 1 is essential for a timely evaluation of the 2,000 square miles of mountain area and determination of the best land management practices for that area to protect recreation and fisheries. Concurrent funding for item 2 would allow for aquatic biological sampling and analysis to be conducted with planned water quality/chemistry and stream flow hydrology analysis for the entire study area. Funding for item 5 could be deferred until such time as the agency determines the approach it wishes to take regarding 208 areawide planning and compliance with NEPA.

	Demonstration Project	Other (Non 208)
1. Watershed Study Rocky Mountains (See Appendix C)	73,078	43,000 (USDA Low Level proposal)
2. Aquatic Biology - Sampling and Analysis (To be integrated into work plan of USDA and Engineering consultant)	25,000	

3.	Economic Impact Analysis (University Contract)	18,000
4.	Interim reporting (February, 1976 to February, 1978); meetings; media; brochures; hearings; visual aids; reports; maps; supplies	6,400
5.	Draft and Final EIS documentation, circulation and comment integration - final report on demonstration project (staff salary February, 1978-May, 1978)	12,000
	Total	\$134,478

APPENDIX B

PROPOSED WORK PLAN

V. ENVIRONMENTAL, SOCIAL, AND ECONOMIC IMPACT ASSESSMENT

GENERAL METHODOLOGY AND OBJECTIVES

Pursuant to the National Environmental Protection Act (NEPA) of 1969 and Federal Guidelines for the Preparation of Environmental Impact States of April 14, 1975, an Environmental Impact Statement (EIS) is required of any major actions, significantly affecting the quality of the human environment. NEPA requires that agencies include in their decision-making process an appropriate and careful consideration of all environmental effects of proposed actions and their alternates for public understanding, a discussion of ways to avoid or minimize adverse impacts of proposed actions, and a discussion of how to restore or enhance environmental quality as much as possible (CFR 40 6.100).

Section 208 of the Federal Water Pollution Control Act Amendments and projects funded thereby with federal monies administered through the U. S. Environmental Protection Agency are considered to be within the scope of NEPA.

The environmental assessment for the 208 plan will be a written analysis of the environmental impacts expected from the selected 208 Areawide Plan. Federal guidelines for the preparation of the environmental assessment expressly state that the assessment in the preparation of a 208 plan must be an integral though identifiable part of the plan.

As it is currently envisioned, the Environmental Assessment will be performed throughout the planning process, rather than the traditional approach to environmental assessment whereby the assessment is conducted after the selection of a plan; the assessment will run concurrently with other elements in the planning process. Citizens will be encouraged to participate in an advisory capacity through 208 Committee involvement, through regularly-scheduled public hearings, and through elected officials who will make decisions on planning alternatives as they develop.

The broad objective of the Environmental Assessment work element is to totally integrate environmental issues and considerations into the decision-making process. A continued assessment of the various areawide planning alternatives as they evolve will serve three vital functions:

1. It will provide a means to inform the public to the problems (both political and environmental) of developing and selecting a plan for the future.
2. It will encourage documentation of the decision-making process and facilitate citizen input to decisions made by elected officials.

3. It will provide for an effective means to compare in a relative sense "viable" plan alternatives and subalternatives.

Throughout the Environmental Assessment exercise, input and data will be sought from public agencies, universities, and various organizations and interest groups. Information from COG Consultants will be integrated into the assessment through careful coordination and review of their interim findings.

The following contacts will be included as the various tasks in the assessment are conducted:

- ENG - COG Water Quality Engineering Consultant
- PEDL - COG Population and Land-Use Consultant
- IFM - COG Institutional and Financial Management
- ENV - COG Environmental Impact Statement

- CDH - Colorado Department of Health
- CHS - Colorado Historical Society
- CAS - Colorado Archaeological Society
- CFS - Colorado State Forest Service
- HB1041 - Colorado House Bill 1041 Inventories
- CSU - Colorado State University
- UNC - University of Northern Colorado
- CWCB - Colorado Water Conservation Board
- CDPR - Colorado Division of Parks and Outdoor Recreation
- CDW - Colorado Division of Wildlife

- USFS - U. S. Forest Service
- USGS - U. S. Geological Survey
- SCS - U. S. Soil Conservation Service
- USCOE - U. S. Army Corps of Engineers
- EPA - U. S. Environmental Protection Agency
- NPS - U. S. National Park Service

Environmental groups such as the Sierra Club, Friends of the Earth, Trout Unlimited, Greeley Committee on the Environment, Fort Collins' Designing Tomorrow Today, and many others too numerous to mention will be brought into the process. The contacts which are made will include local environmental groups as well as local chapters of larger state and national organizations. Their concerns will be solicited and integrated into the identification of environmental issues.

The written Environmental Assessment portion of the plan will be prepared primarily by the COG Staff with input from consultants responsible for other elements of the study.

The environmental assessment report preparation will be principally the responsibility of the Assistant Director/Natural Resources Planner for the 208 program. Special consultants employed in the environmental assessment will be expected to submit complete reports of their findings which will be integrated into the environmental assessment report by COG.

A requisite for an in-depth environmental assessment is an appropriate and sufficient data base. The reliability and availability of information about the physical, biological, demographic, and economic environment must be consistent with the objectives of the analysis.

Resource inventories are very costly and time consuming. There are state and federal governmental agencies charged by statute with the task of compiling these materials as a regular part of their scope of services. As with most inventory compilation efforts, the immediate need for information preceeds the ability of the responsible agency to produce it by several years. Even though sufficient data may not be readily available for all of the region, it would appear to be of limited value to conduct basic primary inventories with 208 funds where it would mean removing funds from other priority elements of study required to meet objectives of the Act.

The LWRCOG will contribute \$15,000 of its total 208 grant to the State of Colorado for technical assistance and coordination of the program at the State level. Five other COGS in Colorado who are also conducting 208 programs will allocate a portion of their grant funds to the State to bring a total of \$126,000 for State coordination. Under the contract currently being negotiated between the State and the six 208 COGs, the State will be required to honor reasonable specific information requests by the COGs for 208 water quality management related materials through its various departments and divisions. It is likely that some small special inventories may be conducted through this agreement and will be a source of additional information, for example stream biota inventories which may be provided by the Division of Fish and Wildlife.

For additional inventories of data which may be required to supplement or interpret existing technical data, beyond that which can be provided by the State, COG Staff, or its immediate consultants in their regular work load, there would be a provision for special consultant subcontracting arrangements not to exceed \$8,000.

A. IDENTIFICATION OF MAJOR ISSUES AND DEVELOPMENT OF DETAILED OUTLINE

Task 1: Assessment of Environmental Concerns

Objective: To make a determination of water quality related environmental issues as perceived by the general public, various interest groups, and governmental agencies in the region, an assessment of the environmental concerns will be conducted. Perceptions of environmental problems as viewed by informed individuals and residents of the region will be utilized in identifying priority issues to be analyzed in selecting an areawide plan.

Task 2: Formalized Documentation of the Assessment of Environmental Concerns

Output: Interviews, questionnaires, telephone surveys, and technical reviews of inventoried data from Task 1 would be utilized in outlining and documenting the nature and magnitude of environmental concerns which have been identified. The Subcommittee on Environmental Impact (Public Participation Element VI) will assist in the selection of a structured outline which will guide the development of the environmental assessment.

B. NATURAL, SOCIAL, ECONOMIC, ENVIRONMENTAL PROFILE OF THE REGION

Task 1: Review of Existing Conditions

Objective: Compile, review, and evaluate existing inventories and data in the Region in environmental impact analysis. The primary objective is to determine the characteristics of the region in the context of its human and natural resources and economic base.

Task 2: Ascertain the Adequacies of Existing Environmental Inventories for Assessment and Impact Analysis

Objective: The areal coverage, technical accuracy, and applicability of various inventories will be assessed to determine their usefulness in areawide water quality planning. The need for additional work will be indicated where data is absent or of unacceptable quality.

Task 3: Special Study Inventory and Analysis

Objective: To provide thorough technical analysis in the review evaluations or actual inventory of environmental data, the services of a competent individual in that field will be solicited.

Task 4: Prepare a Report on the Environmental Character of the Region.

Output: Review, evaluation, and synthesis of the following data on the region:

1. Natural Environment
 - a. Climate/precipitation/air quality (NOAA, SCS, CDH, EPA, ENV)
 - b. Topography (USGS)
 - c. Geology (USGS, HB 1041)
 - d. Soils (SCS)
 - e. Hydrology and water resources (surface and ground water) (ENG, USGS, SCS CWC, BR, NCWCB)
 - f. Flood hazard (USCOE, SCS, CSWCB)
 - g. Vegetation
 - Habitat
 - Fragile ecosystems
 - Rare or unique ecosystems (USFS, SCS, HB 1041, NPS, CSU, UNC, ENV)
 - h. Rare and endangered species
 - i. Aesthetics/Visual (SCS, CSU, USGS, NPS, CDPR, ENV)
 - j. Wild fire hazard (CFS, USFS)
 - k. Wildlife, fisheries, aquatic biology (CDW)
2. Land Use and Resource Utilization Areas (PEDL, ENV)
 - Existing land use
 - Planning and controls
 - Type amount and growth intensities
3. Recreation Resources, Trends, and Water-Related Sites of Recreation for Accessibility and Activities (PEDL, ENV)
4. Site of Historical, Archaeological, Scientific, and Cultural Significance (CHS, CSU, UNC, CAS, HB 1041, ENV)
5. Public Health
6. Economic Profile (PEDL)
7. Water and Wastewater Inventories and Projections (ENG)
 - a. Existing facilities inventories
 - b. Waste sources
 - c. Urban runoff
 - d. Impervious ground cover invertions and projections
 - e. Historic background water quality conditions
 - f. Baseline water quality conditions

8. Institutional Arrangements for Waste Treatment Management (IFM)
9. Financial Arrangements for Waste Treatment (IFM)
10. Inventory of Constraints on Resource Use and Restrictions Based on Review of Local, Regional, and State Goals and Objectives (PEDL, IFM, ENG)

C. ENVIRONMENTAL IMPACTS OF ALTERNATIVE PLANS

Task 1: Review Baseline Conditions and Projections

Objective: Review baseline conditions and projected population and land uses as they relate to water quality. Postulate possible effects to natural, social, and economic conditions in the region.

Task 2: Develop, Evaluate, and Compare Alternative Management Plans

Objective: Develop a methodology to reflect various human and natural environmental opportunities and constraints to alternative management plans. The evaluation procedure will draw heavily upon Element VI for Public Participation.

Task 3: Assessment of Environmental Effects of the Viable Plan Alternatives and Subalternatives

Objective: To determine the possible environmental effects of a selected plan, the short and long term beneficial and adverse impacts will be analyzed.

Task 4: Integrated Environmental Assessment Report on Selected Areawide Plan

Output: Fully documented report on analysis, findings, and impacts of selected areawide plan.

APPENDIX C

FOREST SERVICE PROPOSAL FOR DETERMINING
BEST LAND MANAGEMENT PRACTICES FOR THE
ROCKY MOUNTAIN AREA

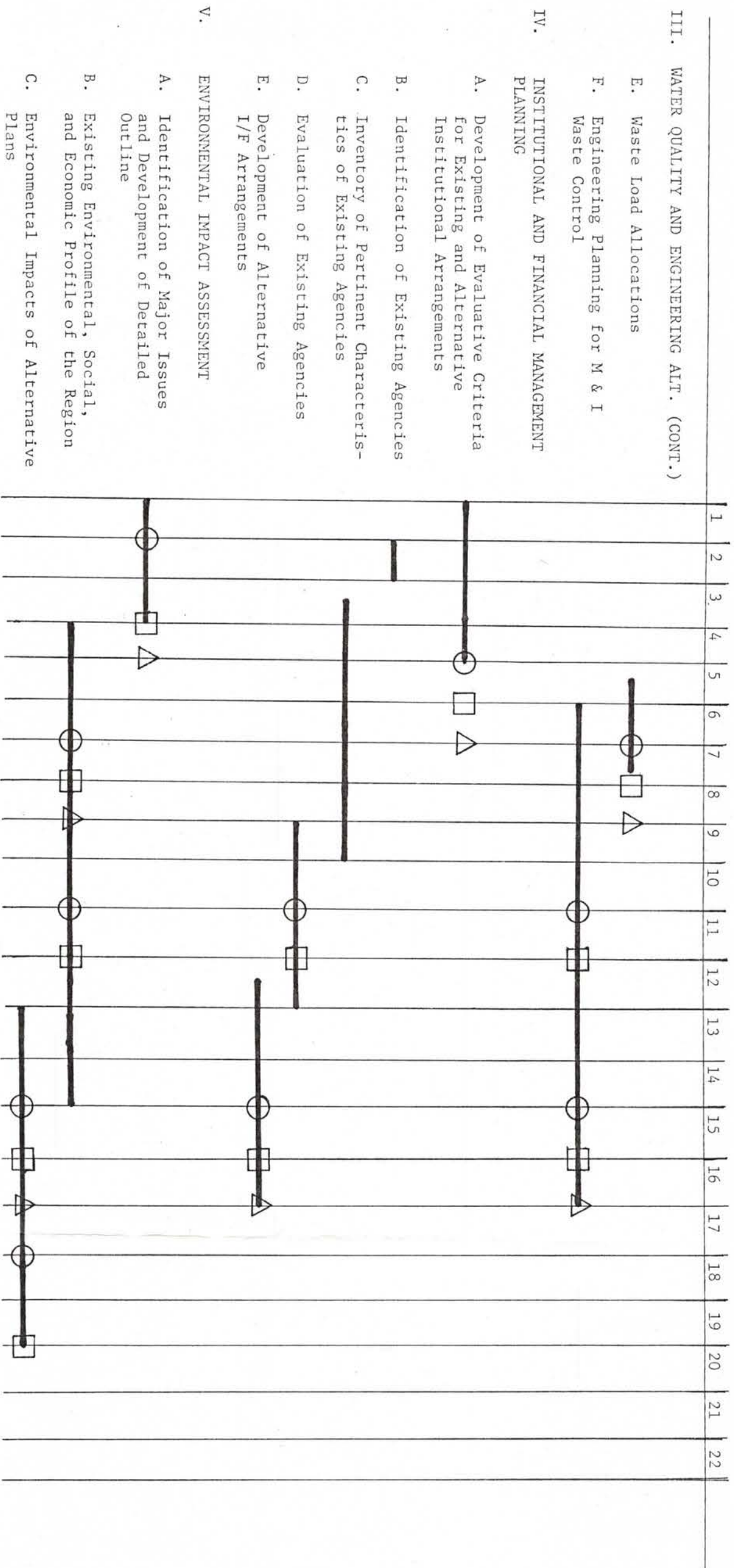
APPENDIX D

208 WORKPLAN SUMMARY, IMPORTANT
MILESTONES, AND TIMETABLE

- 208 Committee
- COG
- ◇ Public Review & Comment
- △ EPA/State

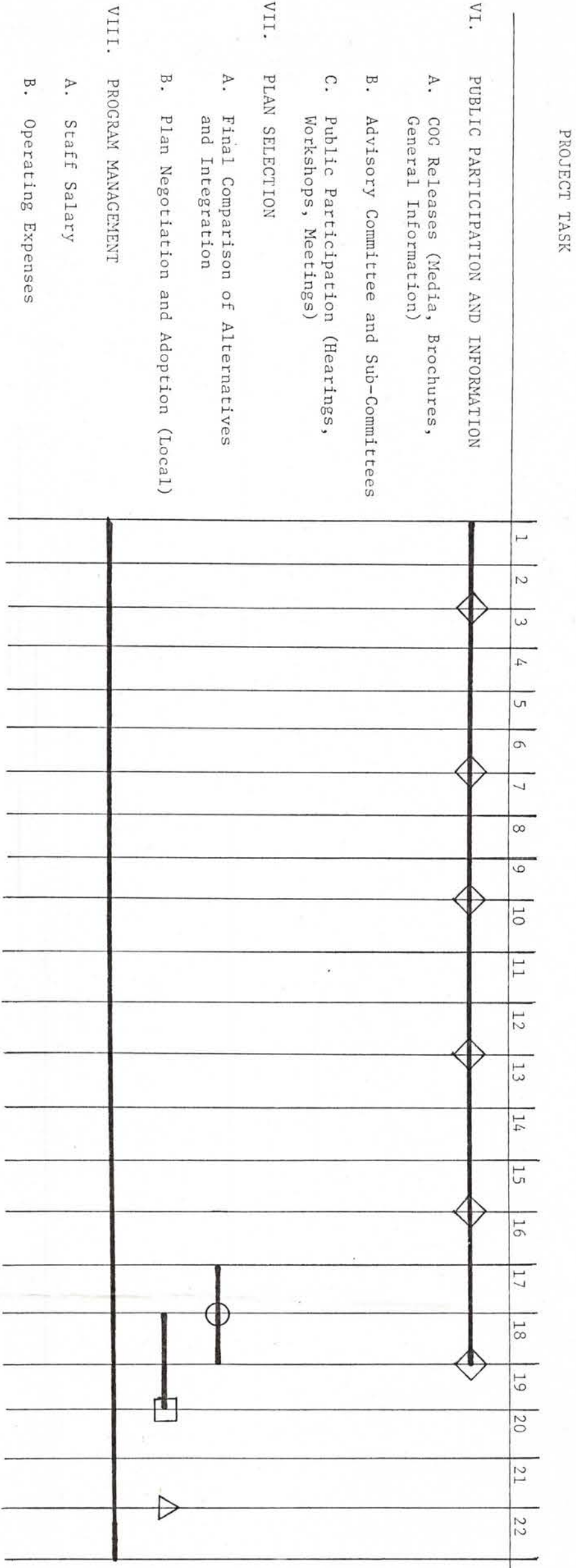
MONTHS FROM PROJECT START

PROJECT TASK



- 208 Committee
- COG
- ◇ Public Review & Comment
- △ EPA/State

MONTHS FROM PROJECT START



LWRCOG 208 AREAWIDE PLANNING
SUMMARY OF PUBLIC MEETINGS

- 2nd month: Orientation to the 208 Areawide Planning Process. Review and comment on major environmental issues
- 6th month: Review and comment on population control totals; evaluative criteria for existing and alternative institutional arrangements; alternative future land use patterns
- 9th month: Review and comment on preliminary engineering alternatives; alternative land use plans; water quality classifications; environmental issues; growth issues (agricultural, municipal, industrial)
- 12th month: Same as in 9th month
- 15th month: Review and comment on refined engineering alternatives and associated institutional and financial arrangements; institutional and financial arrangements for agricultural source control; Best Management Practices; status of environmental impact assessment
- 18th month: Review and comment on proposed 208 plan

LWRCOG 208 AREAWIDE PLANNING
SUMMARY OF MAJOR REVIEW AND DECISION POINTS

TASK	MO	GROUP	REVIEW/DECISION
V.A	1 3 4	208 Comm. COG EPA/State	Determine major environmental issues in the Region
II.A	2 3 3½	208 Comm. COG EPA/State	Acceptable control totals for population/employment allocation purposes
IV.A	4 5 6	208 Comm. COG EPA/State	Determine Evaluative criteria for existing and alternative institutional arrangements
II.C	5 6	208 Comm. COG	Review alternative future land use patterns; selection of a manageable number for testing engineering alternatives and institutional arrangements
III.B III.E V.B	6 7 8	208 Comm. COG State	Review analytical results of stream modeling and waste load allocations; recommend water quality classification for stream segments; determine which stream segments can support fisheries and recreational use; environmental review of consequences of decisions and recommendations
II.D III.F IV.D V.B	10 11	208 Comm. COG	Review preliminary evaluation of alternative wastewater treatment systems based on land use patterns selected in II.C; review status of existing organizations and their ability to finance such systems; environmental evaluation of the above

TASK	MO	GROUP	REVIEW/DECISION
II.D	14	208 Comm.	Review refined engineering alternatives and associated institutional and financial arrangements; recommend preliminary land use plan; determine which alternatives are viable and should have detailed impact analysis for comparative purposes; Best Management Practices for irrigated agriculture.
III.B			
III.F	15	COG	
IV.E	16	EPA/State	
V.C			
VII.A	17	208 Comm.	Adoption of an Areawide Plan
VII.B	19	COG	
	20	L-W Region	
	21	EPA/State	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80203

DEC 12 1975

8W-WP

DEC 15 1975

Mr. F. A. Eidsness
208 Program Director
Larimer/Weld Regional Council of Governments
201 East 4th Street
Loveland, Colorado 80537

Re: Grant No. P 008097-01-0

Dear Eric:

Thank you for the opportunity to review the proposal submitted by the Roosevelt National Forest for a watershed plan development under the subject grant. The review of the proposal by my staff has generated a great deal of enthusiasm for the proposed approach and outputs to be generated as a result of the study.

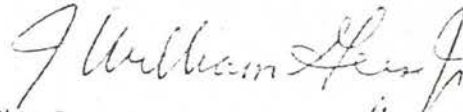
The identification of non-point sources of pollution and methods for their control and prevention should rightfully be an area of emphasis for development of a "208" Plan for an area such as Larimer and Weld Counties. After reviewing the 303(e) Plan for the South Platte River Basin and subsequent "201" facilities plans, I am convinced that non-point source water quality problems should be a high priority for study under the "208" planning effort.

I strongly urge that you consider this proposal for inclusion in the final work program to be submitted LWCOG under the subject grant.

However, I am sure that you recognize that one important aspect of "208" planning is the provision for local decisions concerning what types of water quality problems are most critical from the local viewpoint. A thorough review of and prioritization of water quality

problems should be made by the COG staff prior to finalization of the work program with input from advisory committees, state staff and EPA staff. I look forward to seeing a revised work program by year end.

Sincerely yours,



Charles W. Murray, Jr.

Director

Water Division