WaterSMART Cooperative Watershed Management Program
Phase I for Fiscal Year 2024

Funding Opportunity No. R23AS00362

South Platte Coalition for Urban River Evaluation

South Platte Denver – Urban Watershed Needs Assessment

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1. Technical Proposal

1.1 Executive Summary

The South Platte Coalition for Uban River Evaluation (SP CURE) is submitting this application, due on September 3, 2024, to apply for funding for the *South Platte Denver – Urban Watershed Needs Assessment* (Watershed Needs Assessment, Project) project under the Department of Interior (DOI) Bureau of Reclamation's (USBR) Cooperative Watershed Management Program for Fiscal Year 2024. SP CURE is headquartered in Lakewood, Colorado which is in Jefferson County.

SP CURE proposes to conduct a Watershed Needs Assessment of the aquatic resources and thermal regime of Segment COSPUS14 of the South Platte River, located within a subwatershed of the Upper South Platte River Bain. SP CURE is a collaborative watershed group located in the Denver metro area in Colorado. To support watershed resiliency, SP CURE proposes to conduct biological monitoring to assess the health of the fish and macroinvertebrate communities, identify current and planned segment-specific projects, and use collected data and information to develop a Watershed Needs Assessment to inform a collaborative process, by which stakeholders can identify a desired outcome for the watershed. The South Platte River is an integral resource for the Greater Denver metro communities, providing supply for drinking water and agricultural irrigation, serving as a center for recreation, and home for diverse fish and macroinvertebrate communities. However, Segment COSPUS14 is a heavily urbanized river reach that is highly channelized and impacted by a variety of factors, including hydrologic alteration/water management, urban runoff, and point and non-point sources which have changed the thermal regime and presented water quality issues. The watershed is also located in the arid west and is highly susceptible to drought and low flow conditions, which exacerbates temperature and water quality issues as well as water supply reliability for all watershed users. The proposed Project seeks to alleviate impacts by collecting data necessary to assess current and future river health and conduct outreach to identify collaborative, proactive solutions focused on increasing ecological resiliency and watershed health. This effort will allow the watershed to make informed decisions on future project implementation and funding needed to address critical watershed needs.

The proposed Project is to be completed within 36 months from the time of a grant funding agreement. Project activities are anticipated to start October 2025 and be completed by end of August 2028. The proposed project is not located on a federal facility, nor will it involve federal land.

1.2 Project Location

SP CURE operates within the Upper South Platte River Basin in Colorado within the Denver metro area. The portion of the basin in which SP CURE works within and the Project is located is across several 10-digit Hydrologic Unit Code (HUC) watersheds as shown in Figure 1-1. For this Project, the Watershed Needs Assessment will focus on Segment COSPUS14 of the South Platte River, which begins at 39.560576°, -105.060675° and commences at 39.789904°, -104.970118°as shown in Figure 1-2.

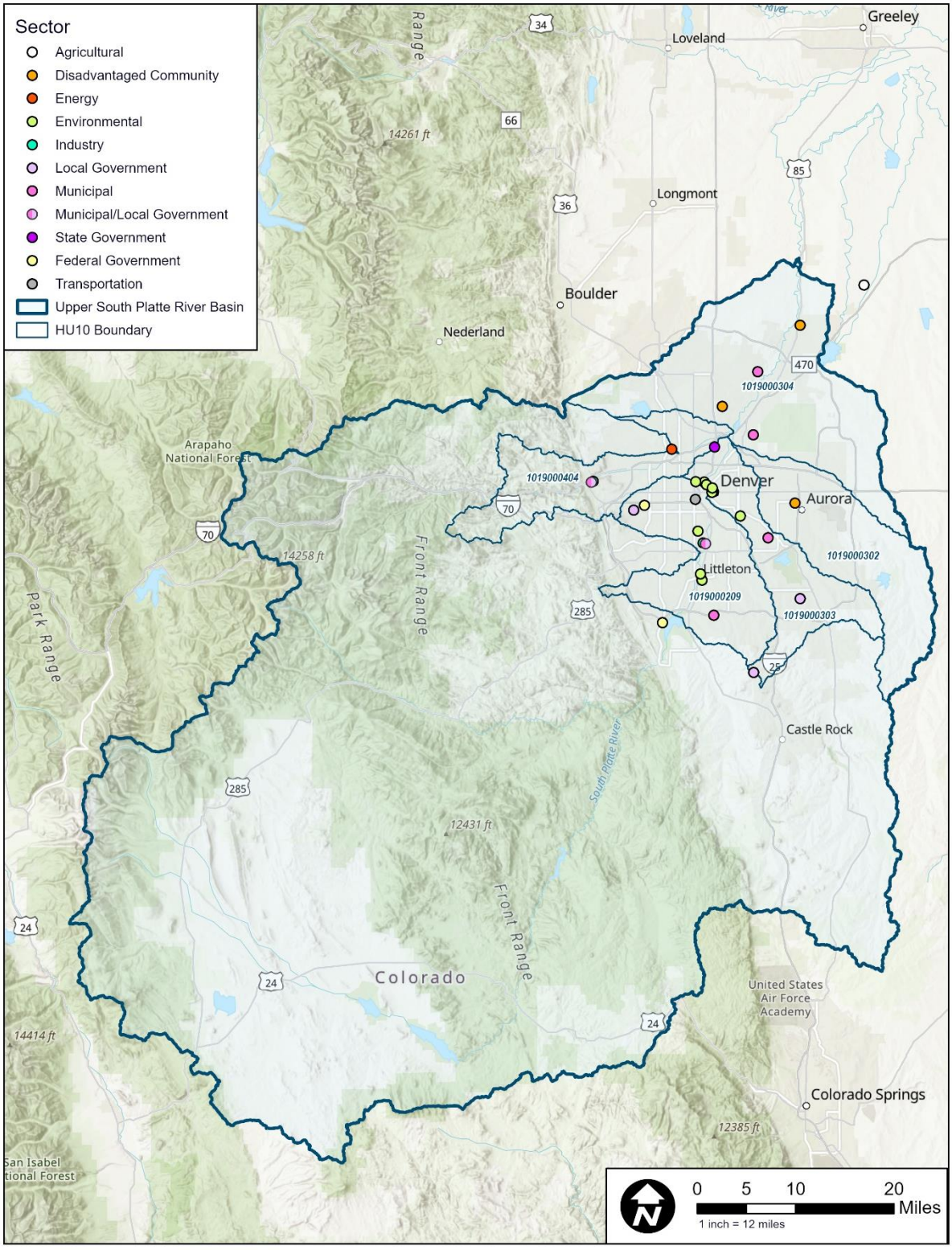

Figure 1-1. SP CURE HUC10 Geographic Boundary

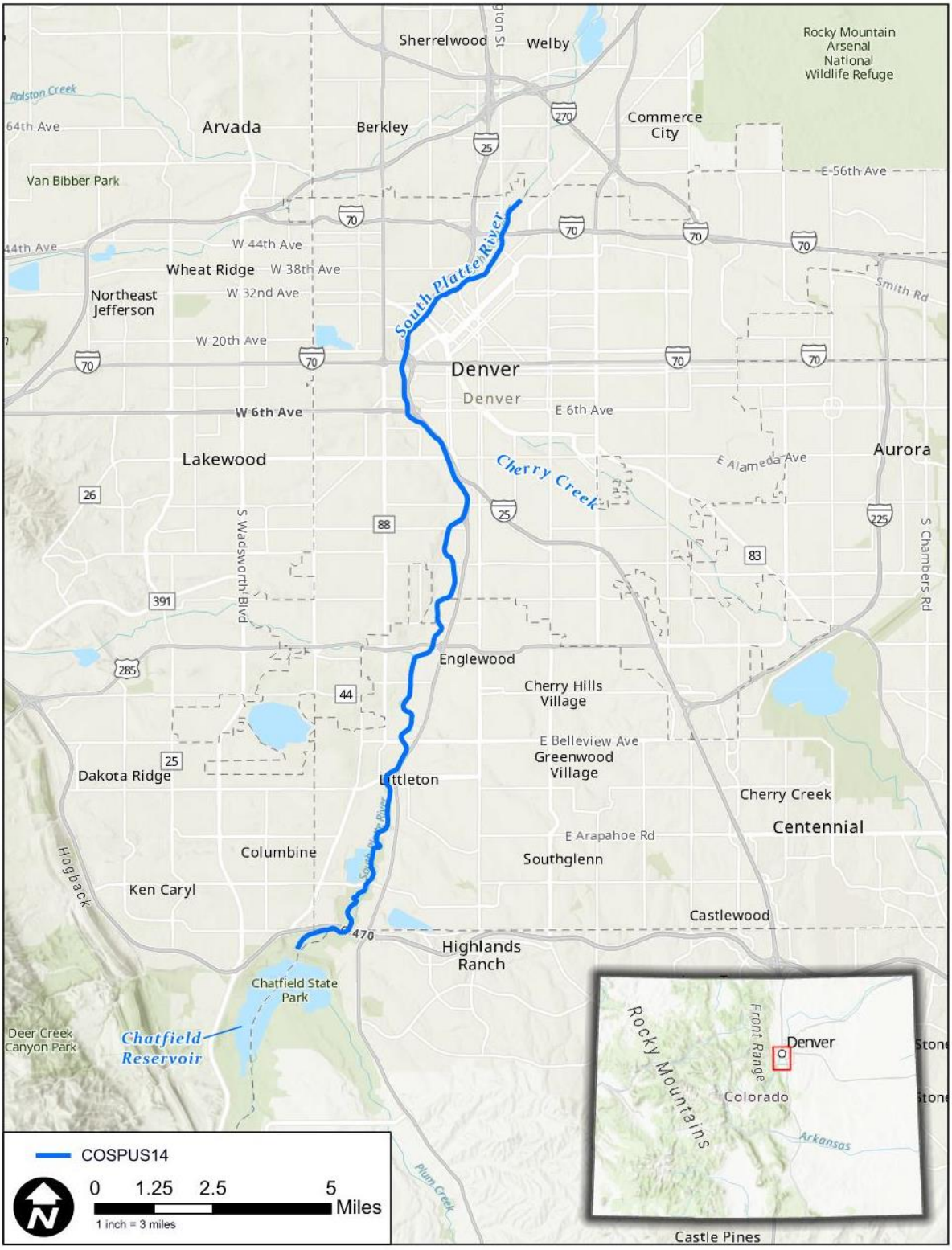

Figure 1-2. Project Area – South Platte River Segment COSPUS14

1.3 Applicant Category

SP CURE is seeking funding as an Existing Watershed Group. The group was established as a grassroots, non-regulatory entity in 1998 to address water quality issues on a watershed basis and support work related to quality monitoring, total maximum daily load (TMDL) assessments, and waste load allocations (WLAs). Since its inception, SP CURE has developed a robust water quality monitoring network that spans throughout the watershed and consists of bimonthly sampling, which is conducted by the group's member organizations. Monitoring has been ongoing since 1998 and continues to grow as the needs of the watershed evolve and as impacts of climate change come to fruition. Using data collected from its extensive monitoring network, SP CURE provides scientific information and reports to inform regulatory proposals. The data are also useful to identify and quantify pollutant sources and potential water quality management options. SP CURE conducts extensive outreach and education within the watershed as well; the group hosts an annual "Confluence at the Confluence" which brings together stakeholders from across the region to learn and share information about water challenges within the South Platte River Basin. External organizations such as federal agencies, environmental advocacy groups, and adjacent watershed groups are often asked to attend SP CURE's monthly meetings to share updates on projects and initiatives. Recent water quality discussions have included topics closely tied with the Colorado Water Quality Control Division's 10-Year Roadmap, which includes parameters such as nutrients, arsenic, temperature, ammonia, PFAS, and salinity. SP CURE also participates in the state's 303(d) Listing Methodology development and associated Regulation No. 93 determinations of use attainment.

Historically, the group has not conducted biomonitoring as part of their monitoring program, thus, no overlap in work is proposed as part of this Project. SP CURE is dedicated to maintaining the health of the watershed and its users.

1.4 Eligibility of Applicant

SP CURE is an Existing Watershed Group that is legally incorporated as a non-profit entity in Colorado. The group is a collaborative, non-regulatory organization that prioritizes addressing water quality issues within the Upper South Platte River Basin through a collaborative watershed-based effort. SP CURE is made up of a diverse group of members including several municipalities serving almost two million citizens, private industries, refinery, and a large Colorado brewery. Beyond its core membership, stakeholders include government, energy, recreation/tourism, environmental, and disadvantaged communities who rely on the health of the watershed for multiple uses including drinking water, irrigation water, and recreation.

1.5 Project Description

SP CURE proposes to conduct a site-specific Watershed Needs Assessment for Segment COSPUS14 of the South Platte River. The goal of this Project is in part to determine the severity of critical issues and needs in Segment COSPUS14 through sampling and stakeholder collaboration, and then preliminarily investigate potential solutions once the most critical needs are identified. Tasks to support the Watershed Needs Assessment include conducting biological monitoring to assess the health of the fish and macroinvertebrate communities, identifying current

and planned segment-specific projects, and using collected data and information to develop a watershed needs assessment to inform a collaborative process, by which stakeholders can identify solutions to support ecological resiliency and overall watershed health. The described activities fall under Task B – Watershed Restoration Planning. A detailed description of activities to be completed under each task are included below.

- Biological and Temperature Monitoring:

  SP CURE proposes to conduct biological and temperature monitoring to assess the health of the fish and macroinvertebrate communities. Data and information obtained will be utilized to characterize current conditions within Segment COSPUS14 and inform the development of the Watershed Needs Assessment. Specific monitoring tasks will be performed by and under the direction of experienced fisheries biologists. Tasks are as follows.

  - Desktop analysis and site reconnaissance to document locations of and characteristics within reaches that appear to provide suitable habitat for sensitive Warm Stream Tier I (WS-I) species (Johnny Darters [*Etheostoma nigrum]*) that inhabits Segment COSPUS14, as well as for the related Iowa Darter (*E. exile*), which is a Tier 2 Species of Greatest Conservation Need (SGCN) in Colorado.[1] Documenting conditions and locations where other, more common Warm Stream Tier II (WS-II) species native to the South Platte River watershed are observed will be a secondary goal. The native WS-II species known to inhabit Segment COSPUS14 include Creek Chub (*Semotilus atromaculatus*), Longnose Dace (*Rhinichthys cataractae*), and White Suckers (*Catostomus commersonii*).
  - Sampling of the fish and macroinvertebrate assemblages will be conducted at up to six sites on the South Platte River in COSPUS14 in spring and fall for two consecutive years. Stream habitat and substrate characteristics will also be measured or described at each site. This effort will help characterize the current conditions of the aquatic community and to preliminarily capture annual, seasonal, and spatial variability in these communities throughout the segment, while documenting the presence and absence of WS-I and WS-II fish species and life stages.
  - Collection of thermal imaging data via drone surveys conducted by a licensed UAV pilot to provide coarse-level imaging data to assist in identifying spatial trends in stream temperature and/or locations that are notably warmer or cooler, potentially as a result of warm water inputs from point or non-point sources or areas of groundwater upwelling, respectively.

[1] Colorado Parks and Wildlife (CPW). 2015. State Wildlife Action Plan. Prepared for the citizens of Colorado and its visitors. https://cpw.state.co.us/Documents/WildlifeSpecies/SWAP/CO_SWAP_MainDocOnly.pdf

- Collection of temperature data from existing thermistors at various locations along Segment COSPUS14. Additionally, up to three additional thermistor locations may be identified to place loggers at locations identified as being of interest. These additional locations could include areas identified as thermal refuge for fish during the stream reconnaissance, areas identified in the drone surveys as notably warmer or cooler, or locations in tributaries to the South Platte River in COSPUS14 that may be influencing the thermal regime. The goal of this activity is to document the thermal regime in COSPUS14 and capture temporal and spatial variability.

- Project Outreach:

  Outreach will be conducted at the beginning and throughout the life of the project with the goal of strengthening coordination between groups in the watershed and creating a collaborative process for which future projects can be implemented through. Outreach will focus on targeting a diverse set of stakeholders (Section 1.6.1, Table 1-2) to ensure SP CURE represents the full extent of the watershed and will combine efforts across multiple groups to streamline implementation of future projects that will provide the most benefits to all watershed users. Additionally, to ensure a well-rounded, comprehensive overview of the system is achieved, opportunities for projects and outreaching within Segment 14 tributaries will be explored. All information obtained from stakeholders will be included in the Watershed Needs Assessment. Activities completed under this task are as follows.

  - Initial outreach will include gathering information on ongoing and future projects and monitoring activities, obtaining relevant data collected by other entities, and soliciting input from stakeholders.
  - Post-monitoring outreach will begin as the Watershed Needs Assessment development begins and includes conducting outreach to collaborate on the monitoring results and assessment analysis.

- Watershed Needs Assessment:

  The Watershed Needs Assessment report will be the primary deliverable for the Project and will contain the data synthesis, data gap analysis, documentation of outreach, and a description of existing and planned projects. This information in turn will be used to determine watershed needs in the project area and may also include identification of opportunities to initiate additional projects and potential partners to collaborate with. Activities under this task are as follows.

  - Summary of desktop analysis, analysis and summary of biological community and thermal data, and integration of findings from these activities to produce a description of baseline conditions in the Project area.
  - Incorporation of outreach process findings and identification of stakeholders interested in supporting and collaborating with SP CURE.
  - Identification of existing or planned projects. Prioritization of planned projects based on a ranking system that will be developed will also be incorporated.

- Description of future watershed needs based on data collected and stakeholder input received.

1.6 Evaluation Criteria

1.6.1 Evaluation Criterion A – Watershed Group Diversity and Geographic Scope

Sub-Criterion No. A-1. Watershed Group Diversity

A description of the stakeholder groups within the watershed that affect or are affected by the quantity or quality of water within the watershed. Describe their role in the watershed and how they interact with the water resources and identify specific organizations, entities, or individuals that make up these groups.

Stakeholder groups within the watershed that affect or are affected by the quantity or quality of water within the watershed include agricultural, municipal, environmental, industrial, energy, disadvantaged communities, and government. All users rely on the South Platte River as a source of water supply. Both quantity and quality of water is of utmost importance for supporting these beneficial uses within the watershed. Table 1-1 provides an overview of the affected stakeholders and their interaction with the water resources within the watershed.

Table 1-1. Stakeholder Groups

Stakeholder Sectors	Organizations	Water Usage
Agricultural	Farmers Reservoir and Irrigation Company (FRICO)	Irrigation
Municipal	Centennial Water and Sanitation District, East Cherry Creek Valley Water and Sanitation District, Metro Water Recovery, City of Golden, South Platte Renew, South Adams County Water and Sanitation District, City of Littleton, City of Englewood	Effluent Use and Water Supply
Environmental	Denver Department of Public Health and Environment, South Platte River Urban Waters Partnership, The Greenway Foundation, South Platte Working Group, Denver Trout Unlimited, South Suburban Parks & Recreation, Mile High Youth Corps, South Platte Watershed Group, Barr Lake & Milton Reservoir Watershed Association, Green Latinos	Environmental Health and Water Conservation
Industrial	Miller Coors, Suncor	Industrial
Transportation	Colorado Department of Transportation	Road-Stream Interfaces such as Crossings
Energy	Suncor, Xcel Energy	Water Supply
Disadvantaged Communities	City of Aurora, City of Brighton, City of Thorton multiple areas along the South Platte Segment COSPUS14	Drinking Water and Recreation

Local Government	Mile High Flood District, Arapahoe County, Douglas County, Metro Basin Roundtable	Environmental Health
State Government	Colorado Parks & Wildlife (CPW)	Environmental Health
Federal Government	US Geological Survey (USGS), US Army Corps of Engineers	N/A

An explanation of the specific individuals, entities, and organizations already participating in the watershed group and whether the current participation is representative of the affected stakeholders within the watershed. Provide a description of the stakeholders that are involved, what their involvement in the group entails, and reference any letters of support or pledges/donations from affected stakeholders and how.

The current membership of SP CURE is diverse and represents multiple sectors located throughout the portion of the watershed in which they work. Membership includes users such as agricultural, municipal, environmental, industrial, energy, disadvantaged communities, and government. Municipalities and government represented include the cities of Aurora, Brighton, Golden, and Thorton; the cities of Auora and Brighton are also categorized as disadvantaged communities according to the White House Council Climate and Environmental Justice Screening Tool. Multiple municipal water and sanitation facilities are also stakeholders, including Centennial Water and Sanitation District, East Cherry Creek Valley Water and Sanitation District, South Platte Renew (owned by Cities of Littleton and Englewood), Metro Water Recovery, and South Adams County Water and Sanitation District. Members in the environmental sector include Denver Department of Public Health and Environment (City and County of Denver) and Mile High Flood District, and the energy sector is represented by Xcel Energy. The agricultural sector is represented by the Farmers Reservoir & Irrigation Company (FRICO). The industrial sector is represented by Miller Coors and Suncor. All members are heavily involved in the monitoring and planning conducted by SP CURE and pay dues to support ongoing efforts for watershed sustainability. Each of these users have a diverse set of water usage and needs that contribute to the diversity of the watershed. This diversity is the foundation of SP CURE's mission, which is illustrated through their robust water chemistry monitoring program which accounts for water quality issues and standards for all member sectors that impact water for drinking, irrigation, industry, and other water uses in the watershed. This water quality monitoring program does not however, include biomonitoring, which is covered under the scope of this Project. As membership expands and the needs of the watershed continue to diversify, so too will SP CURE's goals for creating a healthy and resilient watershed. Members are fully supportive of SP CURE's efforts to expand its monitoring efforts to thermal and biological monitoring as the benefits of the Project seek to inform long term sustainability for all watershed uses beyond what their current monitoring provides. As such letters of support have been provided by several members as well as non-member stakeholders and are included in Section 8 – Letters of Support of this application.

Letters of support have been provided by the following members:

- South Platte Renew
- Metro Water Recovery

- Centennial Water and Sanitation District
- Denver Department of Public Health and Environment
- City of Thorton

Letters of support have been provided by the following non-member stakeholders:

- South Platte River Urban Waters Partnership - This partnership is a collaboration of more than 50 federal, state, local, and non-profit organizations working across governmental and disciplinary boundaries that are in support of the proposed Project.

If the group does not already represent the full stakeholder diversity of the watershed, provide details on how you plan to target affected stakeholders to ensure that your group will represent a diverse set of stakeholders within the watershed, such as engaging in outreach to include new members, or collaborating with different groups or partners.

While SP CURE already represents a diverse set of stakeholders, outreach is identified as a Project task and will be conducted at the beginning and throughout the life of the project to engage new stakeholders and members and strengthen coordination between groups in the watershed. Targeted stakeholders are expected to be diverse and may include state, city, and county agencies such as CPW, Colorado Department of Public Health and Environment, Colorado Department of Transportation, and other municipal and county governments; federal agencies such as USGS and US Army Corps of Engineers; nonprofits active in recent water quality planning efforts and rulemaking hearings such as Trout Unlimited, the Mile High Youth Corps, Conservation Colorado, EarthJustice, and GreenLatinos; existing projects or special interest focused groups such as South Platte Working Group (SPWG), the Metro Basin Roundtable, and South Platte River Urban Waters Federal Partnership (SPRUWP), local schools and businesses, and landowners (including municipalities),and dischargers within COSPUS14 including South Platte Renew, Centennial Water & Sanitation District that could be affected by the project.

Outreach will not only focus on ensuring that SP CURE represents the full extent of the watershed but will also aim to combine efforts across multiple groups to streamline implementation and cost-effectiveness of future projects that will provide the most benefits to all watershed users. All information obtained from stakeholders will be included in the Watershed Needs Assessment to create an assessment that accounts for the needs of all users within the watershed.

A description of the structure of the watershed group. Is there a formal membership process or is participation more informal? How are decisions made within the watershed group? Does a board of directors make decisions or are decisions made on a consensus basis? If the watershed group has a board of directors, how are board members chosen?

SP CURE is incorporated as a non-profit entity and has a set of bylaws from which it operates. SP CURE is governed by a board of directors consisting of a Director-at-large, Chairperson, Vice Chairperson, Treasurer, and Secretary. Additionally, SP CURE has a Technical Monitoring Committee, which is focused on addressing water quality issues in the watershed. Committees,

like the Technical Monitoring Committee, are formed as necessary to address specific issues. Each member pays dues to support their participation and fund the organization's work. SP CURE holds monthly board meetings and bi-monthly technical committee meetings. Both occasions provide a forum for discussion and consideration on watershed issues. While decisions are made by the board of directors, public and stakeholder input is highly considered to make the best decisions for the watershed as a whole. Table 1-2 provides a list of SP CURE's formal members.

Table 1-2. SP CURE Formal Members

Members	Sector
City of Aurora	Disadvantaged Community
City of Brighton	Disadvantaged Community
Centennial Water and Sanitation District	Municipal
Denver Department of Public Health and Environment	Environmental
East Cherry Creek Valley Water and Sanitation District	Municipal
Farmers Reservoir and Irrigation District	Agricultural
City of Golden	Municipal/Local Government
South Platte Renew	Municipal/Local Government
Metro Water Recovery	Municipal
Miller Coors	Industry
South Adams County Water and Sanitation District	Municipal
Suncor	Industry
City of Thorton	Disadvantaged Community
Mile High Flood District	Local Government
Xcel Energy	Energy

Sub-Criterion No. A-2. Geographic Scope

Provide a map illustrating the geographic boundaries of the area in which the watershed group will work.

Figure 1-1 provides the geographic boundaries of the Upper South Platte River Basin, of which SP CURE works within, and the location of its stakeholders. Due to the scale and diversity of the Upper South Platte River Basin, SP CURE only works within a few of its sub watersheds (HUC 10s, Figure 1-1) within the Upper South Platte River Basin, specifically the more urbanized northern portion where their stakeholders are located. The remaining sub watersheds are covered by other watershed groups whose interests and needs align with the ecological landscape of those sub watershed. Table 1-3 indicates which of the watershed stakeholders are currently involved in SP CURE and which will be targeted through outreach.

Table 1-3. Stakeholder Groups

Stakeholders	Status	Sector
City of Aurora	Member	Disadvantaged Community
City of Brighton	Member	Disadvantaged Community
Centennial Water and Sanitation District	Member	Municipal
Denver Department of Public Health and Environment	Member	Environmental
East Cherry Creek Valley Water and Sanitation District	Member	Municipal
Farmers Reservoir and Irrigation District	Member	Agricultural
City of Golden	Member	Municipal/Local Government
South Platte Renew (Owned by Cities of Littleton and Englewood)	Member	Municipal/Local Government
Metro Water Recovery	Member	Municipal
Miller Coors	Member	Industry
South Adams County Water and Sanitation District	Member	Municipal
Suncor	Member	Industry
City of Thorton	Member	Disadvantaged Community
Urban Drainage and Flood Control District	Member	Local Government
Xcel Energy	Member	Energy
South Platte River Urban Waters Federal Partnership	Targeted	Environmental
The Greenway Foundation	Targeted	Environmental
USGS	Targeted	Federal Government
South Platte Working Group	Targeted	Environmental
Denver Trout Unlimited	Targeted	Environmental
Colorado Department of Public Health and Environment	Targeted	Environmental
Colorado Department of Transportation	Targeted	Transportation
Colorado Parks & Wildlife	Targeted	State Government
Arapahoe County	Targeted	Local Government
Douglas County	Targeted	Local Government
South Suburban Parks & Recreation	Targeted	Environmental
Mile High Youth Corps	Targeted	Environmental
US Army Corps of Engineers	Targeted	Federal Government
Metro Basin Roundtable	Targeted	Local Government
Conservation Colorado	Targeted	Environmental

Describe the extent to which the planned membership of the watershed group will represent the full geographic scope of the area in which the group intends to work. If applicable, describe the extent to which the watershed group already represents the geographic scope of the area.

The current membership of SP CURE is already diverse, representing multiple sectors and the full geographic scope of the area in which the group works. Current entities (Table 1-3) represent most

of the stakeholder sectors within the watershed, including agricultural, municipal, environmental, industrial, energy, disadvantaged communities, and government. Majority of these entities provide service/represent interests to either large amounts or most of the area in which SP CURE works. Entities such as Denver Department of Public Health and Environment, Suncor, Xcel Energy and Urban Drainage and Flood Control District provide extensive coverage and services for the majority, if not all, of the sub watersheds in which SP CURE works within. Additionally, the cities of Aurora, Brighton, Golden, and Thorton are four major cities within the Denver metro area that represent a diverse set of economic and social needs. Lastly the remaining municipalities, government, industry, and energy members account for the rest of the geographic scope including the City of Denver and the south suburban area. Not only do these entities provide extensive coverage but they also represent a diverse set of needs within the watershed that will be recognized and prioritized in the development of the proposed Watershed Needs Assessment.

Describe the efforts that you will undertake to ensure that the watershed group will target stakeholders that represent the full geographic scope of the area in which the watershed group will work. For example, will outreach focus on stakeholders in a certain part of the watershed the have historically not been represented in the watershed group.

The applicant currently represents diverse sectors and includes members with interests throughout its full geographic scope. However, SP CURE recognizes the ever-changing landscape and is dedicated to expanding its membership to account for all needs within the watershed. One of the tasks included in the project scope is to conduct additional outreach. While this list may be expanded upon, planned agencies to target representing municipal and environmental interests and local, state, and federal government, including South Platte River Urban Waters Partnership (SPRUWP), the Greenway Foundation, US Geological Survey, South Platte Working Group (SPWG), Denver Trout Unlimited, Colorado Parks and Wildlife (CPW), Arapahoe County, Douglas County, Mile High Youth Corps, Metro Basin Roundtable, US Army Corps of Engineers, Conservation Colorado, EarthJustice, GreenLatinos, and South Suburban Parks and Recreation. These groups have not been historically represented in the watershed group, but as populations and industry in the Denver metro area continue to expand, placing increased demand on watershed resources, so too do SP CURE's efforts to represent the full set and diverse needs of the area for within which it works. As a result, SP CURE will be conducting outreach to support the development of the Watershed Needs Assessment to fully capture the current and future needs of the area.

Describe why you have chosen to work within the watershed area you described. For example, if the watershed group is only working along the river corridor, describe why they are not working within the larger watershed area. Provide a map illustrating the location of the planning or design. Briefly describe why you have chosen to complete site-specific planning or project design in this location.

Significant planning and implementation efforts are ongoing in other parts of the watershed. Segment COSPUS14 of the South Platte River has had little biomonitoring and planning efforts

compared to the rest of the watershed. Figure 1-2 provides an overview of the Project area. Segment COSPUS14 was selected because the reach has significant impacts from urbanization, hydraulic modifications, and drought. Additionally, this portion of the South Platte River has not historically been a priority relative to other large-scale projects occurring further north in the Denver metro area. For example, the Army Corps of Engineers and City of Denver are conducting over $500 million of planning and restoration work in portions of the South Platte River within Segment 15 and its tributaries to the north. Additionally, there are other designated groups that administer water quality planning efforts upstream and within the two major tributaries of this reach, including Chatfield Watershed Authority, Bear Creek Water Quality Association, and Cherry Creek Basin Water Quality Authority. While significant work has been conducted in the surrounding area, little to no biomonitoring and watershed planning has been conducted for COSPUS14. There are many diverse stakeholders that have been interested in projects to enhance habitat, recreation, and connectivity to the surrounding communities, however, there has not been any targeted effort to evaluate Segment COSPUS14. While some monitoring has been conducted, it has been sparse and impacts of thermal inputs to the stream and mitigation to support the aquatic life use has not been evaluated. SP CURE proposes to take a wholistic approach to evaluating the needs of Segment 14 to evaluate how best to support the ecological resiliency of aquatic life and support other watershed issues that are impacted by the health of the river such as water supply reliability. With climate change, this is especially critical, as droughts are expected to occur more often and to be more severe, resulting in reduced and more variable precipitation, river instream flows, and groundwater recharge, which will reduce water supplies for drinking water, agricultural, industrial, and recreational users.[2] This Project will also increase stakeholder coordination and the potential to enhance existing projects and identify new project opportunities that benefit multiple watershed users and uses.

1.6.2 Evaluation Criterion B – Developing Strategies to Address Critical Watershed Needs

Sub-Criterion No. B-1. Critical Watershed Needs or Issues

Please describe in detail the critical issues or needs of the watershed.

The Denver metro area is in a semi-arid climate that experiences a somewhat predictable increase in flows during spring snowmelt, followed by a prolonged dry period punctuated by intense rainfall events. The South Platte River in the Denver Metro area has long been impacted by multiple factors that are inevitable in the urban environment. Historically, the South Platte River was an intermittent stream that dried up in the late summer, but development of water storage and delivery systems for agricultural irrigation, drinking water, and industrial uses have led to major hydrology changes. The South Platte River now flows year-round due to the influence of upstream and

[2]American Rivers. Rivers and Climate Change. Accessed August 25, 2024. https://www.americanrivers.org/threats-solutions/climate-change/#:~:text=water%20scarcity%20and%20insecurity,recreation%2C%20agriculture%2C%20and%20industry

tributary flood control reservoirs (Chatfield, Cherry Creek, and Bear Creek), and the return of effluent from the different uses along the river. While continual flows have brought significant benefits to aquatic and riparian ecosystems, it is important to recognize that balance between aquatic resources and agricultural, municipal, and industrial users is crucial for maintaining healthy systems. This balance is difficult to achieve in the face of climate change, which has resulted in prolonged drought periods interspersed with severe rainfall events. Droughts lead to reduced precipitation, instream river flows, and groundwater recharge, which will reduce water supplies for drinking water, agricultural, industrial, and recreational users. On the other hand, severe storm events contribute high flow volumes which create sediment and water quality issues within streams that negatively impact aquatic and riparian ecosystems, public health, and safety. While frequency of these issues vary, impacts from day to day uses along the river are consistent and include alterations to hydrology, water chemistry (including temperature), and physical changes to stream form. These are described below.

- The hydrograph in Segment COSPUS14 is affected by flow regulation at Chatfield Reservoir, which is located at the upstream end of the segment. This reservoir has a storage capacity of 27,046 acre-feet per year (AFY), and a recent reallocation project allows storage of an additional 20,600 AFY; the reservoir is designed to store approximately 350,000 acre-feet (AF) in emergency flood situations[3]. Median inflow into the reservoir is 100,860 AFY[4] , so the reservoir regularly stores nearly 50% of the annual inflow but has the capacity to store over 300% of the inflow. Because Chatfield Reservoir is used to attenuate floods and to store spring runoff for delivery to various users during periods of lower flow, the hydrograph of the South Platte River downstream of the reservoir is a function of water demand and therefore highly altered from a natural pattern based on water rights calls.

- Physicochemical conditions in the South Platte are also dramatically different from pre-settlement conditions. Segment COSUPS14 is affected by point-sources such as wastewater effluent and nonpoint sources such as urban runoff from impervious surfaces. The point source and nonpoint source inputs to the South Platte River can have a dramatic effect on water temperature, which is a major factor in determining the geographic distributions of fish and aquatic invertebrates[5].

- Extensive building in the Denver Metro Area has converted the South Platte River from a shallow, multi-thread or braided system to a single-thread channel that is disconnected

[3]Denver Water. 2016. 5 things you may not know about Chatfield Reservoir. Available online: https://www.denverwater.org/tap/5-things-you-may-not-know-about-chatfield-reservoir?size=n_21_n. Accessed August 2024.

[4] Chatfield Watershed Authority. 2015. Chatfield Watershed Plan. Final Project Report, Section 319 Nonpoint Source Pollution Control Program. United States Environmental Protection Agency Grant #13 FAA 50697.

[5]Ficke, A. D., C. A. Myrick, and L. J. Hansen. 2007. Potential impacts of global climate change on freshwater fisheries. Reviews in Fish Biology and Fisheries 17:581-613.

from its floodplain[6]. Further, the stream is heavily fragmented. Specifically, Segment COSPUS14 contains multiple grade control structures that are not passable for native fishes, particularly those that are small-bodied. The breaking of the South Platte into multiple, isolated segments prevents fish from moving to exploit resources when and where they are available and to avoid suboptimal/physiologically stressful conditions. These changes have resulted in extensive, and in many cases, irreversible changes to the physical aquatic habitat in the South Platte River.

- Changes to flow regime, physicochemical conditions, and physical habitat have resulted in species loss, the proliferation on nonnative and nuisance species, and a decline in river function throughout the Platte River Drainage[7]. In Colorado, 20 of the 37 Great Plains fish species, most of which are native to the South Platte Drainage, are either extinct or have been assigned a special conservation status[8].

Provide quantitative and qualitative support to describe the severity of the critical issues or needs. If the concerns are not yet severe, describe why it is important to address the concerns preemptively and explain the potential impacts of not addressing the concerns.

The goal of this project is in part to determine the severity of critical issues and needs in Segment COSPUS14 through sampling and stakeholder collaboration, and then preliminarily investigate potential solutions once the most critical needs are identified. Currently, portions of Segment COSPUS14 are listed as impaired for Escherichia coli and arsenic concentrations, and the South Platte River segment immediately downstream (Segment COSPUS15) is listed as impaired for multiple other parameters, including temperature[9]. Stream temperatures in Segment COSPUS14 have not exceeded the criteria applicable to stream reaches categorized as Warm Stream Tier 1 (WS-I) such as this segment. With growing populations, the infrastructure and associated impervious surface area in place to support increasing populations, as well as the anticipated increasing effects from climate change, stream temperatures are at risk of increasing in the future and reductions in precipitation, river instream flows, and groundwater recharge are also expected,

[6] Wohl, E. 2013. Wide Rivers Crossed: The South Platte and the Illinois of the American Prairie. University Press of Colorado, Boulder.

[7]Peters, E. J. and S. Schainost. 2005. Historical changes in fish distribution and abundance in the Platte river in Nebraska. Pages 239-248 in J. N. Rinne, R. M. Hughes, and B. Calamusso, editors. Historical Changes in Large River Fish Assemblages of the Americas. American Fisheries Symposium 45. American Fisheries Society, Bethesda, MD.

[8]Falke, J. A., K. D. Fausch, R. Magelky, A. Aldred, D. S. Durnford, L. K. Riley, and R. Oad. 2011. The role of groundwater pumping and drought in sharing ecological futures for stream fishes in a dryland river basin of the western Great Plains, USA. Ecohydrology 4:682-697.

[9]Colorado Department of Public Health and Environment (CDPHE). 2023. Regulation 93: Colorado's Section 303(d) List of Impaired Waters and Monitoring and Evaluation List. 5 CCR 1002-93. Available at: https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=11077&fileName=5%20CCR%201002-93

which will reduce water supplies for drinking water, agricultural, industrial, and recreational users. Increasing water reuse within the region, and the regulatory requirements for wastewater treatment plants to treat nutrients to low levels (typically through a combination of biological treatment and metals salts) are also expected to add stress to the watershed from increased salinity. While issues are not yet severe, with climate change they are inevitable. Taking proactive action will provide data to develop adaptive solutions to provide ecological resiliency that will have positive rippling impacts on all watershed users who rely on the South Platte River as a source for aquatic life and water for drinking water, agricultural, industrial, and recreational users. Additionally, well-managed, healthy streams provide immense public safety benefits including flood control and fire break. Ultimately, supporting river resiliency supports overall watershed resiliency.

Applicants should consider contacting Federal, state, and local agencies; non-governmental organizations; and other affected stakeholders to discuss what critical issues are affecting the watershed.

Applicant and their consultants have interacted with state agencies and affected stakeholders prior to and while in the process of developing the scope of this Project. The Project also includes a task specifically directed at continuing and broadening the outreach to such stakeholders as the project is initiated and developed to ensure that the watershed needs analysis accounts for all ongoing and future planned activities in Segment COSPUS14.

Sub-Criterion No. B-2. Project Benefits

Please provide an explanation of why your proposed watershed group activities are an important next step for addressing the issues.

The proposed watershed group activities under the scope of the Project will collect vital information and data necessary for the development of need-based solutions focused on ecological resiliency that will benefit all sectors of the watershed that rely on the health of the South Platte River to support municipal, industrial, agricultural, and recreational uses. While data has been periodically collected for portions of Segment COSPUS14, collecting data over a two-year period will provide a comprehensive overview of the system and its needs. This data can be used to develop science-based solutions that are adaptive to climate change rather than implementing project that can be costly with little return for watershed health. Additionally, outreach will be conducted at the beginning and throughout the life of the project with the goal of strengthening coordination between groups in the watershed and creating a collaborative process for which future projects can be implemented through.

Based on current information, what are the expected benefits of the proposed activities? To the extent possible, describe the anticipated benefits. Provide quantitative and qualitative support for the expected benefits (e.g., cite to relevant data sources or literature, provide examples where applicable).

Activities to be conducted under the proposed Project scope will provide data needed to quantify the current issues and needs of Segment COSPUS14. Watershed impacts as a result of current uses and climate change, as previously described, will be alleviated by collecting the necessary data to assess the current and future health of the river and conducting outreach to identify collaborative, proactive solutions focused on increasing ecological resiliency. This will allow the watershed to make informed decisions on future project implementation and funding needed to address critical watershed needs related to ecological resiliency and overall watershed health. Main project benefits include the following.

- As temperatures rise globally, groundwater inputs and other thermal refuges in streams will become increasingly critical for fish[10] including those inhabiting the South Platte River. A primary goal of this project is to identify thermal refuges so they can either be protected or enhanced. These thermal refuges may help resident fishes cope with increasing temperatures.

- Synthesizing existing and supplemental fisheries and temperature data for COSPUS14 into a comprehensive report will make the data more accessible to entities needing a baseline assessment for aquatics in the segment.

- Outreach will help foster the development of coordinated projects, which have the potential for more beneficial impacts than multiple disjointed efforts. Multiple entities in Segment COSPUS14 have expressed interest in funding projects. However, without a specific description of watershed needs and coordination through outreach, projects have a much lower probability of creating uplift.

- Development of a Watershed Needs Assessment will include the data synthesis, data gap analysis, documentation of outreach, and a description of existing and planned projects. This will in turn provide information that will be used to determine watershed needs in the project area and may also include identification of opportunities to initiate additional projects and potential partners to collaborate with. Data will not only support solutions for aquatic life but solutions for water supply reliability for all watershed users. Data collected can be used to support cost-effective, natural solutions that consider all users in the watershed. As previously discussed, the South Platte River is a critical resource that supports many water uses; however, those uses cannot continue unless the health of the

[10] Whitledge GW, Rabeni CF, Annis G, Sowa SP (2006) Riparian shading and groundwater enhance growth potential for smallmouth bass in Ozark streams. Ecol Appl 16:1461– 1473

Eaton JG, Scheller RM (1996) Effects of climate warming on fish thermal habitat in streams of the United States. Limnol Oceanogr 41:1109–1115

river is first prioritized which will improve water quality and provide supply reliability and rippling benefits to all watershed users.

- Fish health and diversity may be tracked by count and physical measurements of each species during sampling events. Macroinvertebrate health, which is an indicator of overall aquatic life use attainment may be tracked over time using the state's multi-metric index (MMI score) approach.

What stakeholders will benefit from the proposed project?

All stakeholders within the watershed area will benefit from the proposed Project including those sectors such as agricultural, municipal, environmental, industrial, transportation, energy, disadvantaged communities, and government (local, state, and federal). Sectors within the watershed heavily rely on the South Platte River as a source of water for drinking, irrigation, industrial, and other municipal uses. The health of the South Platte River is of the utmost importance to the resiliency of the watershed and that starts with ecological resiliency of aquatic life, which is the first to be impacted by the various uses along the river and by climate change induced issues such as drought and severe storm events. Aquatic life not only rely on the health of the river to survive but are the backbone of healthy river systems. Supporting aquatic life use will create a healthy river system which in turn, will support water supply reliability for all users.

1.6.3 Evaluation Criterion C – Readiness to Proceed

Include a preliminary project schedule that shows the stages and duration of the proposed work including major tasks, milestones, and dates. For each task and milestone, indicate who will have the primary responsibly for completion.

SP CURE is well positioned and prepared to conduct the Project upon entering into a grant agreement. SP CURE maintains a large-scale water quality monitoring program and coordinates with numerous stakeholders to implement watershed-based projects which will provide a foundation of experience that will allow for efficient and effective Project execution. The Project schedule is presented in Table 1-3. The project is expected to begin October 2025 with an anticipated completion date of August 2028. The Project is not expected to deviate from Reclamation's proposed schedule of an award date of September 30, 2025 and a completion within the three-year duration. Biological and Temperature Monitoring will not start until after SP CURE receives a notice to proceed from Reclamation's grant officer confirming the completion of the environmental review.

Table 1-3. Project Schedule

Milestone	Estimated Start Date	Estimated Finish Date
Grant Administration and Reporting	October 2025	August 2028
Environmental Documentation	October 2025	March 2026
Permits & Approvals	January 2026	December 2027
Biological and Temperature Monitoring	September 2025	March 2028
Project Outreach	October 2025	March 2028
Watershed Needs Assessment	May 2026	August 2028

Project implementation can be broken down to a series of tasks that will be performed by consultants and contractors. Tasks are aligned with services discussed in the Budget Narrative and presented in the schedule. All Project work is expected to be completed by August 2028. Implementation, by tasks, is discussed further below.

1. **Grant Administration and Reporting**

   A consultant will be engaged to provide grant administration services, including but not limited to the following:

   - Preparation of interim and final performance and financial reports
   - Agreement related cost tracking
   - Preparation of agreement amendments and schedule modifications, as needed
   - Review and advisement of agreement related regulations including procurement and contracting requirements.

   Grant administration tasks will continue for the duration of the Project and grant agreement, including through agreement close-out and the final project and financial report.

   Significant Milestones:

   - Submittal of Interim Performance and Financial Reports
     - While reports will be submitted according to the schedule prescribed in the agreement, it is anticipated that reports will be due in April and October covering activity and expenses for the preceding six months.
   - Submittal of Final Performance and Financial Report
     - While the final reports will be submitted according to the schedule prescribed in the agreement, it is anticipated that the final reports will be due 90 days after the project is complete.

2. **Environmental Documentation**

   If awarded funding, the Project will have a Federal nexus. As such, the Project is anticipated to be subject to the National Environmental Protection Act (NEPA). For the

NEPA compliance work, SP CURE proposes to work with the NEPA Reclamation team to determine what level of NEPA is required, including a Categorical Exclusion Checklist or an Environmental Assessment Document. For this effort, SP CURE will retain a consultant if necessary to help prepare the appropriate document, including conducting cultural and biological surveys to support the NEPA document.

Significant Milestones:

- Completion of surveys
- Commencement and completion of agency consultations
- Completion of documentation (e.g., Categorical Exclusion Checklist)
- Receipt of Notice to Proceed from Reclamation

3. Permits & Approvals

The following permits and approvals will be obtained by SP CURE and/or consultants prior to initiating the sampling activities for this proposed Project:

- An application for an aquatic scientific collection permit will be prepared via collaboration between the applicant and their consultant and will be submitted for approval to Colorado Parks and Wildlife (CPW).
- A week or more prior to each sampling event, the regional CPW biologists will be notified to inform them of the timing.
- Dependent on-site locations, property access may also need to be navigated and approved.

Significant Milestones:

- CPW Aquatic Scientific Collection Permit

4. Biological and Temperature Monitoring

SP CURE, in collaboration with their consultants, intend to take a multi-pronged approach to determining the status of the biological communities and thermal regime of the South Platte River in Segment COSPUS14. These data, along with any other information obtained, will then be utilized to characterize the current conditions within Segment COSPUS14 of the South Platte River and to inform the development and focus of the Watershed Needs Assessment. Estimated monitoring costs equate to $130,857, which is 44% of the total project costs and do not exceed 50% of the requested Reclamation funding. Consultants with local expertise will be engaged to conduct much of this work, in collaboration with SP CURE staff. The following activities are proposed:

- Following desktop analysis, reconnaissance of accessible reaches of the South Platte River within COSPUS14 will be conducted by an experienced fisheries biologist.
- Sampling of the fish and macroinvertebrate assemblages at up to six sites on the South Platte River in COSPUS14 in spring and fall for two consecutive years. Stream habitat and substrate characteristics will also be measured or described at each site.
- Collection of thermal imaging data via drone surveys conducted by a licensed UAV pilot.
- Collection of temperature data from existing thermistors at various locations along Segment COSPUS14 and identify up to three additional thermistor locations to place loggers to document the thermal regime in COSPUS14 and capture temporal and spatial variability.

Significant Milestones:

- Completion of stream reconnaissance
- Completion of stream sampling events
- Conduct Drone Survey
- Record stream temperatures at logger locations

5. **Project Outreach**

As COSPUS14 of the South Platte River runs through highly urbanized areas in metro Denver and the surrounding suburbs, multiple stakeholder groups are actively involved in monitoring, recreation, and restoration activities and plans. However, there is not always significant coordination between groups, and combining efforts across multiple groups has the potential to result in large projects with beneficial impacts. As such, outreach will be an important part of the project initially and throughout the life of the project. Outreach will be conducted by SP CURE, in collaboration with consultants, at the beginning and throughout the life of the project with the goal of strengthening coordination between groups in the watershed and creating a collaborative process for which future projects can be implemented through. Outreach will focus on targeting a diverse set of stakeholders to ensure SP CURE represents the full extent of the watershed (Section 1.6.1, Table 1-2) and combine efforts across multiple groups to streamline implementation of future projects that will provide the most benefits to all watershed users. Additionally, to ensure a well-rounded, comprehensive overview of the system is achieved, opportunities for projects and outreaching within Segment 14 tributaries will be explored. All information obtained from stakeholders will be included in the Watershed Needs Assessment. Activities completed under this task are as follows.

- Initial outreach will include gathering information on ongoing and future projects and monitoring activities, obtaining relevant data collected by other entities, and soliciting input from stakeholders.
- Post-monitoring outreach will begin as the Watershed Needs Assessment development begins and includes conducting outreach to collaborate on the monitoring results and assessment analysis.

Significant Milestones:

- Outreach to other stakeholders with interests in COSPUS14

6. **<u>Watershed Needs Assessment</u>**

SP CURE, in collaboration with consultants, will develop a Watershed Needs Assessment report. The Watershed Needs Assessment report will be the primary deliverable for the project and will contain the data synthesis, data gap analysis, documentation of outreach, and a description of existing and planned projects. This information in turn will be used to determine watershed needs in the project area and may also include identification of opportunities to initiate additional projects and potential partners to collaborate with. Activities under this task are as follows.

- Summary of desktop analysis, analysis and summary of biological community and thermal data, and integration of findings from these activities to produce a description of baseline conditions in the Project area.
- Incorporation of outreach process findings and identification of stakeholders interested in supporting and collaborating with SP CURE.
- Identification of existing or planned projects. Prioritization of planned projects will also be incorporated.
- Description of future watershed needs based on data collected and stakeholder input received.

Significant Milestones:

- Completed Watershed Needs Assessment Report

Proposals with a budget and budget narrative that provide a reasonable explanation of project costs will be prioritized.

The mandatory Budget Narrative and Budget Detail are uploaded into Grants.gov with the submission of this application.

Describe any new policies or administrative actions required to implement the plan or project being designed.

There are no new policies or administrative actions required to implement the Project.

1.6.4 Evaluation Criterion D – Presidential and Department of Interior Priorities

Climate Change

Please provide specific details and examples on how the project will address the impacts of climate change and help combat the climate crisis.

With climate change, the Denver metro area, where the Project resides, has experienced prolonged drought periods interspersed with severe wet events that can have negative impacts on the ecological resiliency of the watershed. According to the U.S. Drought Monitor, the Denver metro area is currently experiencing a D1 (moderate drought) and D2 (severe drought) drought[11]. Droughts cause stress on aquatic and riparian ecosystems and well as decrease water supply and may impact water quality. On the other hand, severe storm events can negatively impact aquatic habitat, flushing extreme amounts of sediment through stream and rivers, which can decrease habitat suitability for and biodiversity of fish species and benthic macroinvertebrates. Additionally, these issues also impact other watershed users such as drinking water and agricultural users who rely on water from the South Platte River to meet drinking water and agricultural irrigation needs. Execution of this Project will collect the necessary data to develop long-term solutions focused on ecological resiliency in the face of climate change.

Does this proposed project strengthen water supply sustainability to increase resilience to climate change?

The proposed Project is expected to strengthen water supply sustainability and increase resilience to climate change by collecting data necessary to develop climate adaptive solutions for watershed health and ecological resiliency. With climate change, droughts are expected to occur more frequently, leading to reduced precipitation, river instream flows, and groundwater recharge, which will reduce water supplies for drinking water, agricultural, industrial, and recreational users. Additionally, low instream flows (not enough water in the river) degrade habitat and are lethal to aquatic species because water tends to be warmer when there is less of it[12]. As such, supporting and maintaining healthy river systems is crucial to strengthening water supply sustainability. This will be done by conducting a Watershed Needs Assessment that will identify adaptive, science-

[11]U.S. Drought Monitor. *Colorado*. https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CO. Accessed August 25, 2024.

[12]American Rivers. Rivers and Climate Change. Accessed August 25, 2024. https://www.americanrivers.org/threats-solutions/climate-change/#:~:text=water%20scarcity%20and%20insecurity,recreation%2C%20agriculture%2C%20and%20industry

based solutions that will support stream health and create a collaborative roadmap toward ecological resiliency to support all watershed users.

Disadvantaged and Underserved Community Benefits

If applicable, describe how the proposed project will serve or benefit a disadvantaged or underserved community, identified using the tool described above.

Segment COSPUS14 of the South Platte River runs from the south end of the Denver metro area, through the city center, and commences at the north of Denver, immediately upstream of the Burlington Ditch Diversion. According to the White House Council on Environmental Quality's interactive Climate and Economic Justice Screening Tool, there are several areas and several members agencies that are classified as disadvantaged (Figure 1-3). Current members that are classified as disadvantaged include the Cities of Aurora, Brighton, and Thorton. Additionally, most of the areas closer to the center of the City of Denver, where Segment 14 runs through, are classified as disadvantaged. The South Platte River is an integral resource for the Grater Denver metro communities, providing drinking water, agricultural irrigation, and recreation for these communities. Managing water quality on the river can be cost prohibitive for communities that rely on the South Platte River as a source of drinking water. Taking a proactive approach to monitoring and prioritizing projects to alleviate ongoing water quality issues and benefit all watershed users will help mitigate costly measures that have negative impacts on these communities and increase public health and safety.

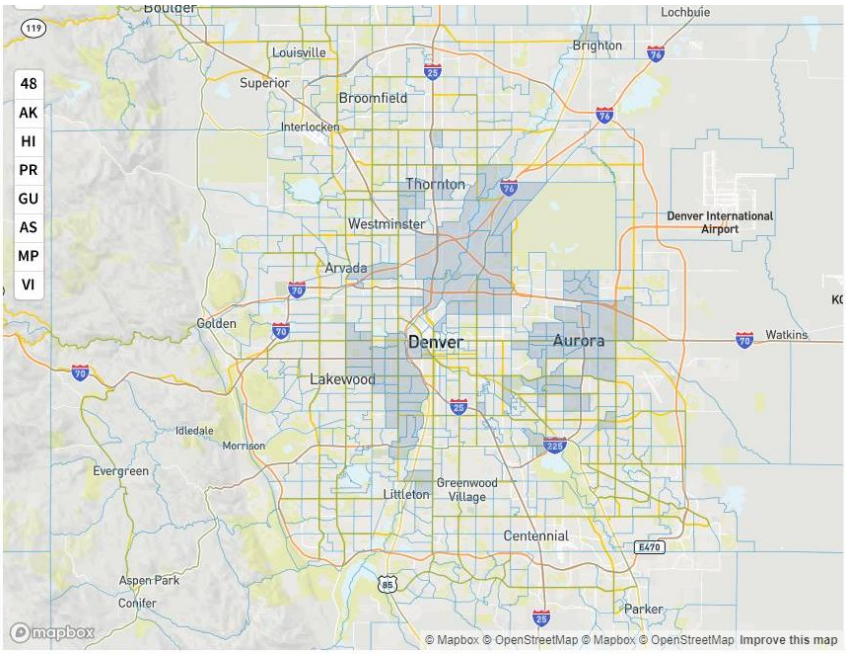

Figure 1-3. White House Council Environmental Justice Screening Tool – Denver Metro Area

2. Project Budget

The mandatory Budget Narrative and Budget Detail are uploaded into Grants.gov with the submission of this application. A summary of Non-Federal and Federal Funding Sources is shown in Table 2-1.

Table 2-1. Summary of Non-Federal and Federal Funding Sources

Funding Sources	Amount
Non-Federal Entities	
1. South Platte Coalition for Urban River Evaluation	$294,027
Non-Federal Subtotal:	$0
Requested Reclamation Funding:	**$294,027**

3. Environmental and Cultural Resources Compliance

The following summarizes SP CURE's approach to avoid, minimize, and mitigate any potential environmental impacts related to the monitoring activities of the proposed Project. The following paragraphs address the specific questions provided in the Environmental and Cultural Resources Compliance section of the NOFO.

Will the proposed project impact the surrounding environment (e.g., soil [dust], air, water [quality and quantity], animal habitat)? Please briefly describe all earth-disturbing work and any work that will affect the air, water, or animal habitat in the project area. Please also explain the impacts of such work on the surrounding environment and any steps that could be taken to minimize the impacts.

The proposed Project monitoring activities are not expected to impact the surrounding environment. At this time, SP CURE is not aware of any part of the current Project scope that will have a significant impact on soil, air, water, or animal habitat. All monitoring and evaluation work will be relatively low-impact with minimal disturbance made to the surrounding environment. Work proposed under the current scope will be conducted in a previously disturbed urban corridor. However, as appropriate, applicable environmental compliance measures will be employed throughout project-related tasks incorporating appropriate conservation measures and best management practices to avoid and minimize any disturbances to riparian areas and instream aquatic habitats. All parking and access to instream assessment areas will be made through previously disturbed areas.

Are you aware of any species listed or proposed to be listed as a Federal threatened or endangered species, or designated critical habitat in the project area? If so, would they be affected by any activities associated with the proposed project?

SP CURE is aware that threatened and endangered species exist in and along the South Platte River. The USFWS Information for Planning and Consultation (IPaC)[13] listed several special status species that could persist or have habitat to support within the Project area. However, based on the relatively low impacts associated with the proposed work to be performed and the IPaC report, adverse impacts to special status species is not anticipated.

Are there wetlands or other surface waters inside the project boundaries that potentially fall under CWA jurisdiction as "Waters of the United States"? If so, please describe and estimate any impacts the proposed project may have.

The Project area contains wetlands and/or other surface waters that potentially fall under CWA jurisdiction as Waters of the United States (WOTUS). However, no disturbance is expected related

[13] US Fish & Wildlife Service. *Information for Planning and Consultation*. Accessed August 18, 2024. https://ipac.ecosphere.fws.gov/

to the proposed monitoring activities. If necessary, SP CURE will contract with a private environmental consultant, after coordinating with Reclamation staff, to assess the Project area and implement best management practices to mitigate potential impacts during onsite monitoring.

When was the water delivery system constructed?

The South Platte River is a natural river system. Chatfield Reservoir, located at the upstream portion of COSPUS14, was constructed in 1975. However, monitoring activities will take place downstream of the reservoir.

Will the proposed project result in any modification of or effects to, individual features of an irrigation system (e.g., headgates, canals, or flumes)? If so, state when those features were constructed and describe the nature and timing of any extensive alterations or modifications to those features completed previously.

No, the proposed Project monitoring activities will not result in any modification of or effects to, individual features of an irrigation system.

Are any buildings, structures, or features in the irrigation district listed or eligible for listing on the National Register of Historic Places?

No, if necessary, SP CURE will contract with a private cultural resources management consultants after coordinating with Reclamation staff to determine what, if any previous cultural resources surveys have been conducted in the Project area. SP CURE currently does not expect to encounter any obstacles in receiving clearance.

Are there any known archeological sites in the proposed project area?

There are no known archeological sites in the proposed Project area. Since the Project area is in an urban area, it is expected that there will be no obstacles to receipt of clearance with respect to archeological sites. In addition, the SP CURE is prepared to implement any necessary mitigation measures should cultural resources be identified.

Will the proposed project have a disproportionately high and adverse effect on low income or minority populations?

No, monitoring activities associated with the Project are not expected to have no impact on disproportionately high and adverse effects on low income or minority populations.

Will the proposed project limit access to, and ceremonial use of, Indian sacred sites or result in other impacts on Tribal lands?

The proposed project will not limit access to or ceremonial use of Native American sacred sites or tribal lands.

Will the proposed project contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area?

The proposed project will not contribute to the introduction, continued existence, or spread of noxious weeds or non-native species in the region. SP CURE and the consultants will implement best management practices to ensure that the introduction or spread of noxious weeds or non-native species will not occur.

4. Overlap or Duplication of Effort Statement

In terms of costs and activities, no overlap exits between this Project and any other active or proposed projects funded by Reclamation. Dan DeLaughter, Treasurer of SP CURE, will serve as Project Manager for this Project. Similarly, Mr. DeLaughter will serve as Project Manager for other projects to be submitted to Reclamation for funding. This proposal does not duplicate any proposal that has been or is anticipated to be submitted for funding Federal of non-Federal funding.

5. Conflict of Interest Disclosure Statement

At the time of submission of this proposal, no actual or potential conflict of interest exists.

6. Uniform Audit Reporting Statement

SP CURE was not required to submit a Single Audit for the most recently closed fiscal year.

7. SF-LLL: Disclosure of Lobbying Activity

SP CURE does not participate in lobbying activities and will therefore not be submitting an SF-LLL at this time. SP CURE has not made nor has agreed to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action.

Further, SP CURE is submitting with this application form SF-424. As stated in the NOFO, the signature on the SF-424 represents the required certifications regarding lobbying.

8. Letters of Support

CENTENNIAL
WATER AND SANITATION DISTRICT

August 27, 2024

South Platte Coalition for Urban River Evaluation
Jake Kunugi
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

Re: Letter of Support for the South Platte River - Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,

I am writing this letter on behalf of Centennial Water and Sanitation District to express our strong support for the South Platte Coalition for Urban River Evaluation (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*. SP CURE's efforts to enhance watershed resiliency through conducting monitoring activities to identify critical watershed needs align with our shared objectives.

Conducting the *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborate approach to addressing issues in the Upper South Platte River Basin. Centennial Water and Sanitation District is highly supportive of the proposed project and recognizes that it will significantly increase data and collaboration for an informed approach to resiliency for all sectors in the watershed. Our support for this project highlights its potential to benefit not only Centennial Water and Sanitation District, but also other entities in the Upper South Platte River Basin who rely on this shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement can be supportive in your efforts to secure grant funding to advance this project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

Sincerely,

Julie Tinetti
Centennial Water and Sanitation District
Regulatory Compliance Coordinator
jtinetti@cwsdhrmd.org
(303) 525-1550

August 28, 2024

Sent Via E-mail: Jkunugi@BrwnCald.com

South Platte Coalition for Urban River Evaluation
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

RE: Letter of Support for the South Platte River – Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,

I am writing this letter on behalf of South Platte Renew to express our strong support for the South Platte Coalition for Urban River Evaluation (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*. SP CURE's efforts to enhance watershed resiliency through conducting monitoring activities to identify critical watershed needs align with our shared objectives.

South Platte Renew operates the 3rd largest water renewal facility in Colorado, and discharges to the South Platte River in Segment COSPUS14. The proposed project will significantly improve stakeholder understanding of aquatic life health and project needs within the watershed. Conducting the *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborate approach to addressing issues in the Upper South Platte River Basin. South Platte Renew is highly supportive of the proposed project and recognizes that it will significantly increase data and collaboration for an informed approach to resiliency for all sectors in the watershed. Our support for this project highlights its potential to benefit not only SPR but also other entities in the Upper South Platte River Basin who rely on this shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement can be supportive in your efforts to secure grant funding to advance this project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

South Platte Renew
2900 S. Platte River Dr., Englewood, CO 80110
P (303) 762-2600 F (303) 762-2620
southplatterenewCO.gov

OWNED BY LITTLETON/ENGLEWOOD

Sincerely,

Dan DeLaughter
Data & Regulatory Programs Manager, South Platte Renew
ddelaughter@englewoodco.gov
303-435-3437

cc: Christine Johnston, SPCURE
Blair Corning, South Platte Renew
Pieter Van Ry, South Platte Renew
Christine Gutierrez, GEI Consultants

ENVIRONMENTAL QUALITY
DENVER PUBLIC HEALTH & ENVIRONMENT

August 27, 2024

South Platte Coalition for Urban River Evaluation
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

Re: Letter of Support for the South Platte River - Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,

The Denver Department of Public Health and Environment's Environmental Quality Division (DDPHE-EQ) is writing this letter in support of the South Platte Coalition for Urban River Evaluation's (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*. SP CURE's efforts to enhance watershed resiliency through conducting monitoring activities to identify critical watershed needs align with our shared objectives.

The *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborate approach to addressing issues in the Upper South Platte River Basin. DDPHE-EQ is supports the proposed project and recognizes that it will significantly increase data collection and collaboration. The data will be used to help create an informed approach to resiliency in the watershed. Our support for the project highlights its potential to benefit the City and County of Denver and other entities in the Upper South Platte River Basin who rely on the South Platte River as a shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement helps in your efforts to secure grant funding to advance the project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

Sincerely,

Jon Novick
Senior Environmental Program Administrator, Water Quality
jon.novick@denvergov.org
720/865-5468

Water Treatment & Quality | 9500 Civic Center Dr. | Thornton, CO 80229
303-255-7772 | caleb.owen@thorntonco.gov | Thorntonco.gov

August 28th, 2024

South Platte Coalition for Urban River Evaluation
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

Re: Letter of Support for the South Platte River - Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,
I am writing this letter on behalf of the City of Thornton to express our strong support for the South Platte Coalition for Urban River Evaluation (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*. SP CURE's efforts to enhance watershed resiliency through conducting monitoring activities to identify critical watershed needs align with our shared objectives.

Conducting the *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborate approach to addressing issues in the Upper South Platte River Basin. City of Thornton is highly supportive of the proposed project and recognize that it will significantly increase data and collaboration for an informed approach to resiliency for all sectors in the watershed. Our support for this project highlights its potential to benefit not only City of Thornton but also other entities in the Upper South Platte River Basin who rely on this shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement can be supportive in your efforts to secure grant funding to advance this project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

Sincerely,

Signature

8/28/24
Date

Caleb Owen, Water Quality Administrator

CITY OF THORNTON

August 8, 2024

South Platte Coalition for Urban River Evaluation
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

Re: Letter of Support for the South Platte River - Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,

I am writing this letter on behalf of Metro Water Recovery to express our strong support for the South Platte Coalition for Urban River Evaluation (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*. SP CURE's efforts to enhance watershed resiliency through conducting monitoring activities to identify critical watershed needs align with our shared objectives.

Conducting the *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborate approach to addressing issues in the Upper South Platte River Basin. Metro Water Recovery is highly supportive of the proposed project and recognizes that it will significantly increase data and collaboration for an informed approach to resiliency for all sectors in the watershed. Our support for this project highlights its potential to benefit not only Metro Water Recovery but also other entities in the Upper South Platte River Basin who rely on this shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement can be supportive in your efforts to secure grant funding to advance this project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

Sincerely,

Jim Dorsch
Senior Water Quality Manager, Metro Water Recovery
jdorsch@metrowaterrecovery.com
(303) 286-3368

South Platte River
Urban Waters Partnership

August 28, 2024

South Platte Coalition for Urban River Evaluation
1527 Cole Boulevard, Suite 300
Lakewood, CO 80401

Re: Letter of Support for the South Platte River - Urban Denver Needs Assessment

Dear South Platte Coalition for Urban River Evaluation,

I am writing this letter on behalf of the South Platte River Urban Waters Partnership to express our strong support for the South Platte Coalition for Urban River Evaluation (SP CURE) proposed project, *South Platte River – Urban Denver Needs Assessment*.

The South Platte River Urban Waters Partnership, also known as SPRUWP, is a part of the Federal Urban Waters Partnership. We are a collaboration of organizations, working across governmental and disciplinary boundaries. Our aim is to protect and restore lands and waters in the South Platte River watershed. The partnership emphasizes stewardship and community connection, linking urban areas with forested watersheds and people with nature. SP CURE's efforts to enhance watershed resiliency by conducting monitoring activities to identify critical watershed needs align with our shared objectives.

Conducting the *South Platte River – Urban Denver Needs Assessment* will provide data and information crucial to inform a collaborative approach to addressing issues in the Upper South Platte River Basin. SPRUWP is highly supportive of the proposed project and recognize that it will significantly increase data and collaboration for an informed approach to resiliency for all sectors in the watershed. Our support for this project highlights its potential to benefit not only SPRUWP but also other entities in the Upper South Platte River Basin who rely on this shared resource for drinking water, agricultural irrigation, recreation, and environmental uses.

We hope that our endorsement can be supportive in your efforts to secure grant funding to advance this project. Should the funding agency wish to discuss our interest and support, please do not hesitate to reach out.

Sincerely,

Samuel Wallace, South Platte River Urban Waters Partnership Ambassador,
On behalf of the South Platte River Urban Waters Partnership
C: 303-253-5920
E: wallace@peakfacilitation.com

9. Official Resolution

If selected, SP CURE will provide an official resolution adopted by their board of directors, committing the applicant to the financial and legal obligations associated with receipt of an award under Notice of Funding Opportunity (NOFO) No. R23AS00362.

10. Unique Entity Identifier & System of Award Management (SAM)

SP CURE is providing this screen shot (below) of their account as sufficient verification of an open and active System of Award Management (SAM) account with their Unique Entity Identifier (UEI) number displayed.

Additionally, the UEI is provided on the SF-424 form.