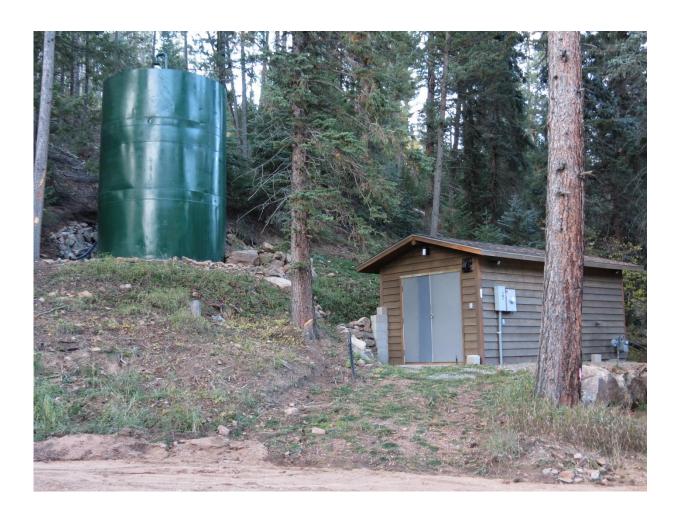
Cragmont Water Company Source Water Protection Plan – PUBLIC VERSION

Jefferson County, Colorado September 2018





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Cover photo: Cragmont WC water treatment facility and terminal storage tank.

This Source Water Protection Plan is a planning document and there is no legal requirement to implement the recommendations herein. Actions on public lands will be subject to federal, state, and county policies and procedures. Action on private land may require compliance with county land use codes, building codes, local covenants, and permission from the landowner. This SWPP for the Cragmont WC was developed using version 16.09.09 of the Colorado Rural Water Association's Source Water Protection Plan Template.

TABLE OF CONTENTS

COMMON ACRONYMS	3
LIST OF FIGURES	4
LIST OF TABLES	5
EXECUTIVE SUMMARY	6
INTRODUCTION	8
Purpose of the Source Water Protection Plan	10
Background of Colorado's SWAP Program	10
Source Water Assessment Phase	11
Source Water Protection Phase	11
SOURCE WATER SETTING	13
Location and Description	13
Hydrologic Setting	13
DRINKING WATER SUPPLY OPERATIONS	15
Water Supply and Infrastructure	15
Water Supply Demand Analysis	18
SOURCE WATER PROTECTION PLAN DEVELOPMENT	19
Stakeholder Participation in the Planning Process	19
Development and Implementation Grant	21
Source Water Assessment Report Review	22
Defining the Source Water Protection Area	22
Inventory of Potential Contaminant Sources and Other Issues of Concern	24
Priority Strategy of Potential Contaminant Sources and Other Issues of Concern	24
DISCUSSION OF POTENTIAL CONTAMINANT SOURCES AND ISSUES OF CONCERN	28
Wildfire	28
Onsite Wastewater Treatment Systems	28
Wastewater Treatment Facility	29
Residential Practices	30
Roads	31
Chemical De-Icers & Weed Abatement on Roadways	31
Chemical De-Icers	31
Dust Abatement on Roads	32
Weed Abatement	32
Security/Vandalism	33
SOURCE WATER BEST MANAGEMENT PRACTICES	34

EVALUATING EFFECTIVENESS OF SOURCE WATER PROTECTION PLAN	37
REFERENCES	38
APPENDICES	40

COMMON ACRONYMS

BMP Best Management Practice

CDOT Colorado Department of Transportation

CDPHE Colorado Department of Public Health and Environment

CRWA Colorado Rural Water Association

GIS Geographic Information System

MGD Million Gallons per Day

OWTS Onsite Wastewater Treatment System

PSOC Potential Source of Contamination

SWAA Source Water Assessment Area

SWAP Source Water Assessment and Protection

SWPA Source Water Protection Area

SWPP Source Water Protection Plan

TOT Time of Travel

USFS United States Forest Service

WWTF Wastewater Treatment Facility

LIST OF FIGURES

Figure 1: Schematic drawing of the potential source of contamination to surface and groundwater	8
Figure 2: Location of Cragmont WC & its water sources in Jefferson County, Colorado	9
Figure 3: Source Water Assessment and Protection Phases	11
Figure 4: Cub Creek sub-watershed within the Upper South Platte basin	14
Figure 5: Cragmont WC water system schematic	15
Figure 6: Sprucedale #1Intake	16
Figure 7: Sprucedale #2 Intake	16
Figure 8: Cragmont WC Treatment Plant	17
Figure 9: Buried Terminal Tank	17
Figure 10: Cragmont WC Source Water Protection Area	23
Figure 11: CRWA's SWAP Risk Assessment Matrix	25
Figure 12: Conventional Septic System (Tri-County Health Department, 2016)	
Figure 13: Residential Practices (Colorado State University Extension/NRCS, 2017)	

LIST OF TABLES

Table 1: Surface Water Supply Information	15
Table 2: Planning Meetings	
Table 3: Stakeholders and Steering Committee Members	
Table 4: Potential Contaminant Sources and Issues of Concern Prioritization Table	
Table 5: Source Water Protection Best Management Practices	

EXECUTIVE SUMMARY

There is a growing effort in Colorado to protect community drinking water sources from potential contamination. Many communities are taking a proactive approach to preventing the pollution of their drinking water sources by developing a source water protection plan. A source water protection plan identifies a source water protection area, lists potential contaminant sources and outlines best management practices to reduce risks to the water source. Implementation of a source water protection plan provides an additional layer of protection at the local level beyond drinking water regulations.

The Cragmont WC values a clean, high quality drinking water supply and decided to work collaboratively with area stakeholders to develop a Source Water Protection Plan. The source water protection planning effort consisted of public planning meetings with stakeholders including local citizens and landowners, and agency representatives during the months of October 2015 through October 2017, in Evergreen, Colorado. Colorado Rural Water Association was instrumental in this effort by providing technical assistance in the development of this Source Water Protection Plan.

The Cragmont WC obtains its drinking water from two surface water intakes off Cub Creek. The Source Water Protection Area for these water sources includes the Cub Creek Watershed boundary upstream of the surface water diversion. This Source Water Protection Area is the area that the Cragmont WC has chosen to focus its source water protection measures to reduce source water susceptibility to contamination. The Steering Committee conducted an inventory of potential contaminant sources and identified other issues of concern within the Source Water Protection Area.

The Steering Committee developed several best management practices to reduce the risks from the potential contaminant sources and other issues of concern. The best management practices are centered on the themes of building partnerships with community members, businesses, and local decision makers; raising awareness of the value of protecting community drinking water supplies; and empowering local communities to become stewards of their drinking water supplies by taking actions to protect their water sources.

The following list highlights the highest priority potential contaminant sources and/or issues of concern and their associated best management practices.

Wildfire

- Provide a copy of the final Source Water Protection Plan along with GIS shapefiles of the source water protection area to US Forest Service, Colorado State Forest Service, Colorado Division of Fire Prevention & Control, Evergreen Fire Protection District, and the Jefferson County Office of Emergency Management for consideration when planning and implementing wildfire mitigation projects.
- Educate homeowners about the importance of maintaining proper defensible space, fuel break thinning, etc.

Onsite Wastewater Treatment Systems

 Collaborate with the Jefferson County Building Department to locate and map all the active (and potentially inactive) OTWS within Zone 1 of the SWPA.

- Collaborate with the Jefferson County Public Health Department to provide OWTS owners within the source water protection area with educational material on the proper use and maintenance of their OWTS.
- o Promote Jefferson County Drug Take-Back Days and consider hosting an event

• Wastewater Treatment Plant

- o Continue to rely on current enforcement of regulations at the state level.
- Develop an Emergency Notification card and share with the operators of upstream wastewater treatment plants to ensure that Cragmont are notified of spills quickly enough to shut off the wells to minimize impact from any incident.
- o Meet with upstream WWTP to notify about them about source water protection efforts

The Steering Committee recognizes that the usefulness of this Source Water Protection Plan lies in its implementation and will begin to execute these best management practices upon completion of this Plan.

This Plan is a living document that is meant to be updated to address any changes that will inevitably come. The Steering Committee will review this Plan at a frequency of once every three to five years or if circumstances change resulting in the development of new water sources and source water protection areas, or if new risks are identified.

INTRODUCTION

Source water protection is a proactive approach to preventing the pollution of lakes, rivers, streams, and groundwater that serve as sources of drinking water. For generations water quality was taken for granted, and still today many people assume that their water is naturally protected. However, as water moves through and over the ground, contaminants may be picked up and carried to a drinking water supply.

While a single catastrophic event may wipe out a drinking water source, the cumulative impact of minor contaminant releases over time can also result in the degradation of a drinking water source. Contamination can occur via discrete (point source) and dispersed (nonpoint source) sources. A discrete source contaminant originates from a single point, while a dispersed source contaminant originates from diffuse sources over a broader area. According to the US Environmental Protection Agency, nonpoint source pollution is the leading cause of water quality degradation (Ground Water Protection Council, 2007).

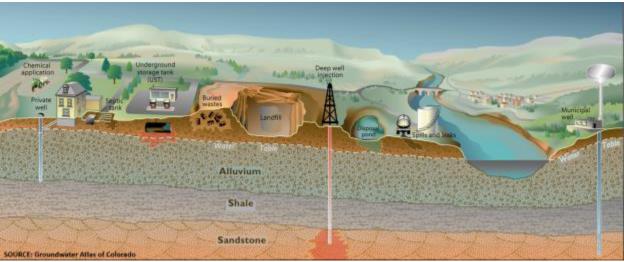


Figure 1: Schematic drawing of the potential source of contamination to surface and groundwater

The Cragmont WC recognizes the potential for contamination of their drinking water sources, and realizes that the development of this Source Water Protection Plan is the first step in protecting this valuable resource. Proactive planning is essential to protect the long-term integrity of the drinking water supply and to limit costs and liabilities. This SWPP demonstrates the Cragmont WC's commitment to reducing risks to their drinking water supply.

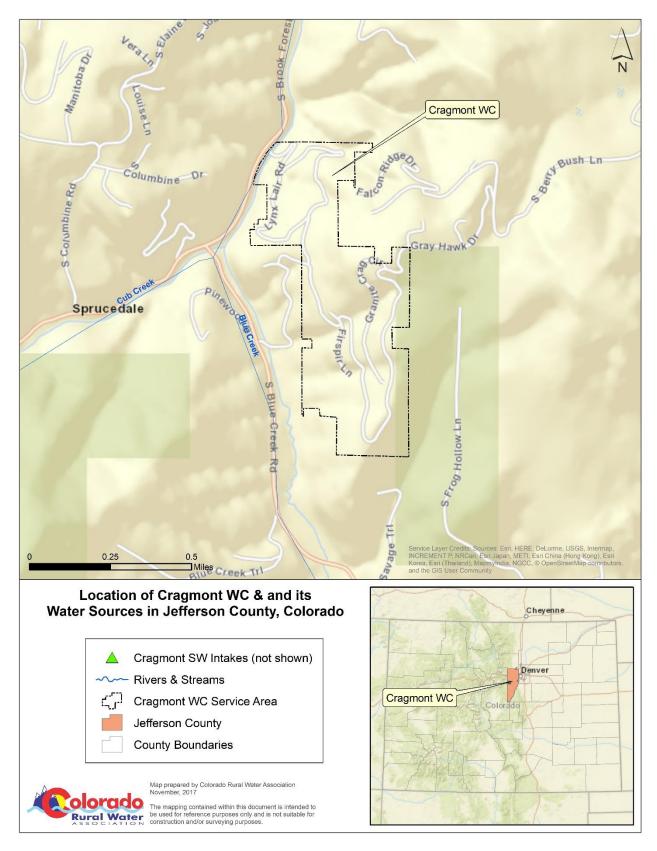


Figure 2: Location of Cragmont WC & its water sources in Jefferson County, Colorado

Purpose of the Source Water Protection Plan

The Source Water Protection Plan (SWPP) is a tool for the Cragmont WC to ensure clean and high-quality drinking water sources for current and future generations. This Source Water Protection Plan is designed to:

- Create an awareness of the community's drinking water sources and the potential risks to surface water and/or groundwater quality within the watershed;
- Encourage education and voluntary solutions to alleviate pollution risks;
- Promote management practices to protect and enhance the drinking water supply;
- Provide for a comprehensive action plan in case of an emergency that threatens or disrupts the community water supply.

Developing and implementing source water protection measures at the local level (i.e. county and municipal) will complement existing regulatory protection measures implemented at the state and federal governmental levels by filling protection gaps that can only be addressed at the local level.

Background of Colorado's SWAP Program

Source water assessment and protection came into existence in 1996 as a result of Congressional reauthorization and amendment of the Safe Drinking Water Act. These amendments required each state to develop a source water assessment and protection (SWAP) program. The Water Quality Control Division, an agency of the Colorado Department of Public Health and Environment (CDPHE), assumed the responsibility of developing Colorado's SWAP program and integrated it with the Colorado Wellhead Protection Program.

Colorado's SWAP program is an iterative, two-phased process designed to assist public water systems in preventing potential contamination of their untreated drinking water supplies. The two phases include the Assessment Phase and the Protection Phase as depicted in the upper and lower portions of Figure 3, respectively.

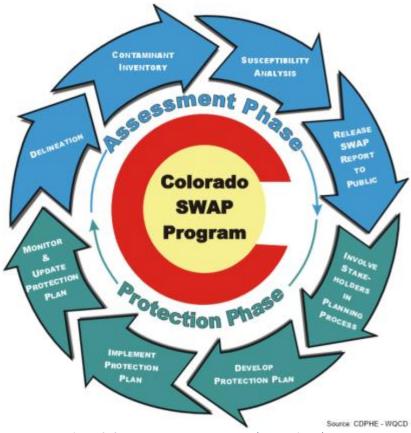


Figure 3: Source Water Assessment and Protection Phases

Source Water Assessment Phase

The Assessment Phase for all public water systems was completed in 2004 and consisted of four primary elements:

- 1. Delineating the source water assessment area for each of the drinking water sources;
- 2. Conducting a contaminant source inventory to identify potential sources of contamination within each of the source water assessment areas;
- 3. Conducting a susceptibility analysis to determine the potential susceptibility of each public drinking water source to the different sources of contamination;
- 4. Reporting the results of the source water assessment to the public water systems and the general public.

A Source Water Assessment Report (Appendices A - B) was provided to each public water system in Colorado in 2004 that outlines the results of this Assessment Phase.

Source Water Protection Phase

The Protection Phase is a non-regulatory, ongoing process in which all public water systems have been encouraged to voluntarily employ preventative measures to protect their water supply from the potential sources of contamination to which it may be most susceptible. The Protection Phase can be used to take action to avoid unnecessary treatment or replacement costs associated with potential contamination of the untreated water supply. Source water protection begins when local decision

makers use the source water assessment results and other pertinent information as a starting point to develop a protection plan. As depicted in the lower portion of Figure 3, the source water protection phase for all public water systems consists of four primary elements:

- 1. Involving local stakeholders in the planning process;
- 2. Developing a comprehensive protection plan for all of their drinking water sources;
- 3. Implementing the protection plan on a continuous basis to reduce the risk of potential contamination of the drinking water sources; and
- 4. Monitoring the effectiveness of the protection plan and updating it accordingly as future assessment results indicate.

The water system and the community recognize that the Safe Drinking Water Act grants no statutory authority to the Colorado Department of Public Health and Environment or to any other state or federal agency to force the adoption or implementation of source water protection measures. This authority rests solely with local communities and local governments.

The source water protection phase is an ongoing process as indicated in Figure 3. The evolution of the SWAP program is to incorporate any new assessment information provided by the public water supply systems and update the protection plan accordingly.

SOURCE WATER SETTING

Location and Description

Cragmont Water Company provides utilities to the Cragmont subdivision in Jefferson County approximately four miles southwest of Evergreen, Colorado. Cragmont WC is managed by the Homestead Water Company. Primary access to the subdivision is via Brook Forest Road. The majority of Cragmont WC's source waters lie within both public and private lands. The private land includes within the unincorporated areas of Jefferson County and consists or rural residential development. The public lands include US Forest Systems Lands, managed by the Clear Creek Ranger District.

The topography of the area is mountainous, with elevations ranging from 7,600 to 10,200 feet above sea level. The area lies in the "South Rocky Mountains – High Mountains and Valleys" Common Resource Areas. This area is best characterized by steep, high mountain ranges and associated mountain valleys. The temperature regimes are mostly frigid and cryic; moisture regimes are mainly ustic and udic. Vegetation is sagebrush-grass at low elevations, and with increasing elevation ranges from coniferous forest to alpine tundra.

The land surrounding Cragmont WC's source waters receives an estimated average annual precipitation of 21 inches. Rainfall typically occurs as frontal storms in the spring and early summer, and as high intensity, convective thunderstorms in late summer. Maximum precipitation is from mid spring through late autumn, with precipitation falling as snow in winter. The average annual temperature is from 37 to 66 degrees F. The frost-free period averages 154 days but ranges from 111 to 180 days (USDA Natural Resources Conservation Service, February 2010).

Hydrologic Setting

Cub Creek is the principal source of drinking water for Cragmont WC. The Cub Creek sub-watershed drains approximately 22.25 square miles (14,241 acres) and is part of the Trout/West Creeks watershed within the Upper South Platte basin (Hydrologic Unit Code (HUC) 10190002). The headwaters of Cub Creek originate on private and US Forest system lands receives flows from high altitude snowmelt. Cub Creek flows into Bear Creek, which eventually flows into the South Platte River. The EPA Watershed Quality Assessment Report for the Upper South Platte Watershed Basin does not list Cub Creek as impaired (United States Environmental Protection Agency, 2017)

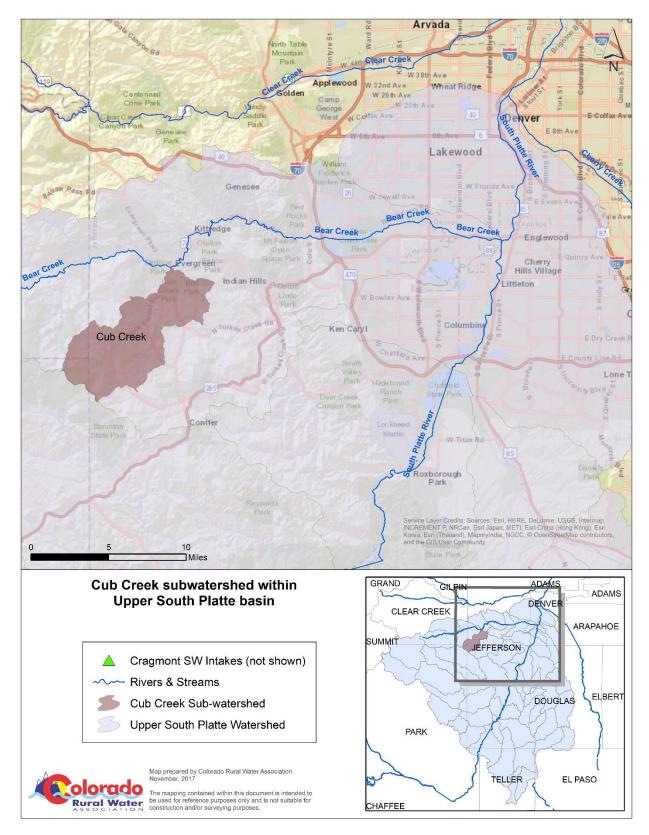


Figure 4: Cub Creek sub-watershed within the Upper South Platte basin

DRINKING WATER SUPPLY OPERATIONS

Water Supply and Infrastructure

The Cragmont WC operates a community water supply system that supplies drinking water to 60 residents located within Jefferson County, Colorado. The Cragmont WC obtains their drinking water from two surface water intakes in the Cub Creek watershed.

Cragmont Water draws water from two dug wells in the alluvium of Cub Creek along S. Brook Forest Road. Sprucedale Gallery #1 is a hand dug well which originally served 6936 S. Brook Forest Road and is the primary source of water. Sprucedale Gallery #2 is an emergency source and is a collection gallery lying underneath Sprucedale Reservoir. Both wells are permitted for 10 gallons per minute (gpm) with a maximum combined rate of 10.8 gpm. Water from the galleries is treated using a Filter Tech UltraFlex skid with Pentair AquaFlex 55 modules. The water is filtered to 0.01 micron then chlorine (disinfectant) and SeaQuest (corrosion inhibiter) are added and the water is stored in a 11,000-gallon clear well for contact time. The finished water is pumped as needed to the Terminal Storage Tank and enters the distribution system to the homes.

Table 1: Surface Water Supply Information

Water System Facility Name	Water System Facility Number	Surface Water Source	Constructed Date
Sprucedale #1		Cub Creek Alluvium	1963
Sprucedale #2		Cub Creek Alluvium	2006

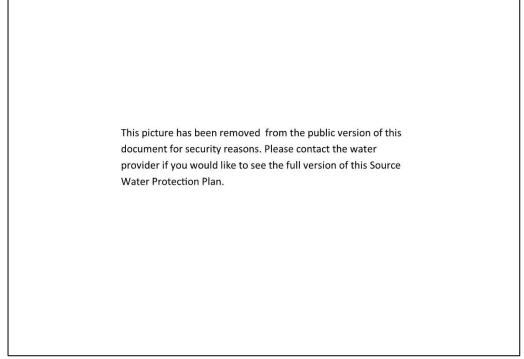


Figure 5: Cragmont WC water system schematic

This picture has been removed from the public version of this document for security reasons. Please contact the water provider if you would like to see the full version of this Source Water Protection Plan.

Figure 6: Sprucedale #1Intake

This picture has been removed from the public version of this document for security reasons. Please contact the water provider if you would like to see the full version of this Source Water Protection Plan.

Figure 7: Sprucedale #2 Intake

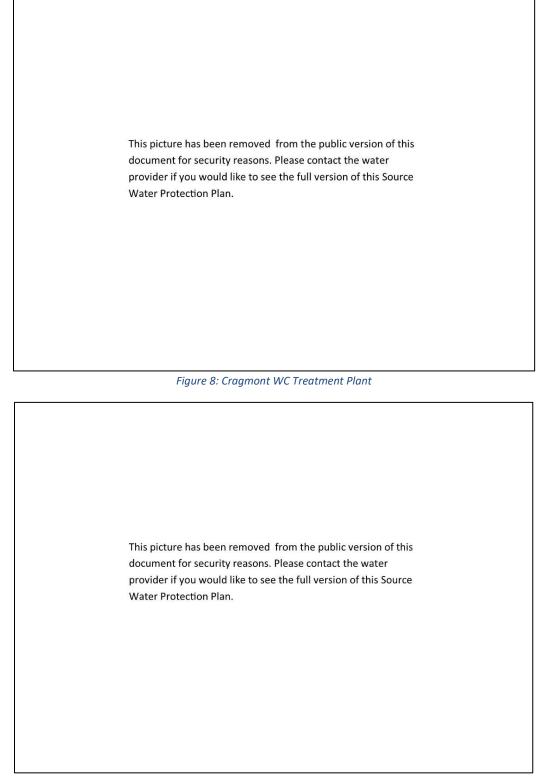


Figure 9: Buried Terminal Tank

Water Supply Demand Analysis

The Cragmont WC serves an estimated 17 connections and approximately 60 residents and other users in the service area annually. The water system has the current capacity to produce 15,550 gallons per day. Current estimates indicate that the average daily demand is approximately 2,900 gallons per day, and that the average <u>peak</u> daily demand is approximately 3,300 gallons per day. Using these estimates, the water system has a surplus average daily demand capacity of 12,650 gallons per day and a surplus average peak daily demand capacity of 12,250 gallons per day.

Based on the estimates above, the Cragmont WC has determined that if one of their water sources became disabled for an extended period of time due to contamination, the Cragmont WC may not be able to meet the average daily demand of its customers. And in the event that one of water sources become disabled for an extended period of time, the Cragmont WC may not be able to meet the average <u>peak</u> daily demand of its customers.

The ability of Cragmont WC to meet either of these demands for an extended period of time is also affected by the amount of treated water the water system has in storage at the time a water source(s) becomes disabled.

Cragmont WC recognizes that potential contamination of its groundwater source(s) could result in having to treat the groundwater and/or abandon the water source if treatment proves to be ineffective or too costly. To understand the potential financial costs associated with such an accident, the Cragmont WC estimates that it could cost \$50,000 in today's dollars to replace one of its water sources (i.e., replacement of the intake structure and the associated infrastructure). Treatment costs, which can vary depending on the type of contaminant(s) that need(s) to be treated, were not included in this estimate.

The potential financial and water supply risks related to the long-term disablement of one or more of the community's water sources are a concern to the Steering Committee. As a result, the Steering Committee believes the development and implementation of a source water protection plan for Cragmont WC and the Cragmont Subdivision can help to reduce the risks posed by potential contamination of its water source(s). Additionally, the Cragmont WC has developed an emergency response plan or contingency plan) to coordinate rapid and effective response to any emergency incident that threatens or disrupts the community water supply.

SOURCE WATER PROTECTION PLAN DEVELOPMENT

The Colorado Rural Water Association's (CRWA) Source Water Protection Specialists, Kimberly Mihelich and Dylan Trujillo, helped facilitate the source water protection planning process. The goal of CRWA's Source Water Protection Program is to assist public water systems in minimizing or eliminating potential risks to drinking water supplies through the development and implementation of Source Water Protection Plans.

The source water protection planning effort consisted of a series of public planning meetings and individual meetings. Information discussed at the meetings helped the Cragmont WC develop an understanding of the issues affecting source water protection for the community. The Steering Committee then made recommendations for best management practices to be incorporated into the Source Water Protection Plan. In addition to the planning meetings, data and other information pertaining to Source Water Protection Area was gathered via public documents, internet research, phone calls, emails, and field trips to the protection area. A summary of the meetings is represented below.

Table 2: Planning Meetings

Date	Purpose of Meeting
October 5, 2017	<u>Planning Meeting w/ Cragmont WC & CRWA</u> : Review of the State's Source Water Assessment for Cragmont WC; Develop preliminary list of potential sources of contamination.
January 25, 2016	<u>Planning Meeting w/ Cragmont WC & CRWA</u> : Identify stakeholders to invite to SWPP meetings; Set SWPP Workshop dates and agendas
March 15, 2016	<u>First Stakeholders Meeting</u> : Presentation on the process of developing a Source Water Protection Plan for the Cragmont WC. Review of the State's Source Water Assessment for Cragmont WC.
March 9, 2017	Planning Meeting w/ Cragmont WC & CRWA: Re-delineate of source water protection areas
April 21, 2017	Planning Meeting w/ Cragmont WC & CRWA: Re-delineate of source water protection areas
May 16, 2017	Second Stakeholders Meeting: Identify and discuss potential sources of contamination
July 20, 2017	<u>Planning Meeting w/ Cragmont WC & CRWA</u> : Review planning process and delineation of source water protection areas; Identify other stakeholders to invite to SWPP meetings
October 17, 2017	<u>Third Stakeholders Meeting</u> : Develop best management practices. Prioritize potential sources of contamination

Stakeholder Participation in the Planning Process

Local stakeholder participation is vitally important to the overall success of Colorado's Source Water Assessment and Protection (SWAP) program. Source water protection was founded on the concept that informed citizens, equipped with fundamental knowledge about their drinking water source and the threats to it, will be the most effective advocates for protecting this valuable resource. Local support

and acceptance of the Source Water Protection Plan is more likely when local stakeholders have actively participated in its development.

The Cragmont WC's source water protection planning process attracted interest and participation from 17 stakeholders including local citizens and landowners, and agency representatives. During the months of October 2015 through October 2017, planning meetings were held in Evergreen, Colorado to encourage local stakeholder participation in the planning process. Stakeholders were notified of meetings via letters, emails, phone calls, and social media postings.

A Steering Committee to help develop the source water protection plan was formed from the stakeholder group. The Steering Committee's role in the source water protection planning process was to advise the Cragmont WC in the identification and prioritization of potential contaminant sources as well as management approaches that can be voluntarily implemented to reduce the risks of potential contamination of the untreated source water. All Steering Committee members attended at least one meeting and contributed to planning efforts from their areas of experience and expertise. Their representation provided diversity and led to a thorough Source Water Protection Plan. The Cragmont WC and the Colorado Rural Water Association are very appreciative of the participation and expert input from the following participants.

Table 3: Stakeholders and Steering Committee Members

Stakeholder	Title	Affiliation	Steering Committee Member
Norm Lewis	President/Engineer	Cragmont & Homestead Water Company	Х
Henry Thresher		Golden Meadows Homeowners Association	х
Frank Dearborn	Fire Marshall	Evergreen Fire Rescue	Х
Randy Rudloff	Board Member	Inter-Canyon Fire Protection	Х
Gary Burch	Resident	Cragmont WC/Homestead WC	Х
Mark Hasseman	Board Member	Homestead Water Company	Х
Patricia VanInwagen	Resident	Cragmont WC/Homestead WC	Х
Chris VanInwagen	Resident	Cragmont WC/Homestead WC	Х
Tom Roan	Resident	Cragmont WC/Homestead WC	Х
Keith Sargent	Board Member	Homestead Water Company	Х
Matt Taber	Board Member	Homestead Water Company	Х
Joe Musca	Engineer	Homestead Water Company	Х
Matt Taber	Homeowner	Village at Cragmont	Х
Matt Schultz	Homeowner	Homestead Subdivision	Х
Dick Mayo	Homeowner	Village at Cragmont	Х
Craig Choun	Homeowner	Homestead Subdivision	Х
Linda Choun	Homeowner	Homestead Subdivision	Х

Development and Implementation Grant

The Cragmont WC has been awarded a \$5,000 Development and Implementation Grant from the Colorado Department of Public Health and Environment (CDPHE). This funding is available to public water systems and representative stakeholders committed to developing and implementing a source water protection plan. A one to one financial match (cash or in-kind) is required. The Cragmont WC was approved for this grant in February 2015, and it expires on February 25, 2019. Cragmont WC intends to use the funds to implement management approaches that are identified in this Plan.

Source Water Assessment Report Review

Cragmont WC has reviewed the Source Water Assessment Report along with the Steering Committee. These Assessment results were used as a starting point to guide the development of appropriate management approaches to protect the source waters of Cragmont WC from potential contamination. A copy of the Source Water Assessment Report for Cragmont WC can be obtained by contacting the Cragmont WC or by downloading a copy from the CDPHE's SWAP program website located at: https://www.colorado.gov/cdphe/source-water-assessment-and-protection-swap.

Defining the Source Water Protection Area

A source water protection area is the surface and subsurface areas within which contaminants are reasonably likely to reach a water source. The purpose of delineating a source water protection area is to determine the recharge area that supplies water to a public water source. Delineation is the process used to identify and map the area around a pumping well that supplies water to the well or spring, or to identify and map the drainage basin that supplies water to a surface water intake. The size and shape of the area depends on the characteristics of the aquifer and the well, or the watershed. The source water assessment area that was delineated as part of the Cragmont WC's Source Water Assessment Report provides the basis for understanding where the community's source water and potential contaminant threats originate, and where the community has chosen to implement its source water protection measures in an attempt to manage the susceptibility of their source water to potential contamination.

After carefully reviewing their Source Water Assessment Report and the CDPHE's delineation of the Source Water Assessment Area for each of the Cragmont WC's sources, the Steering Committee chose to accept it as their Source Water Protection Area for this Source Water Protection Plan.

The SWPA is divided into three zones, which helped guide the potential contaminant source inventory and risk assessment determination during development of this Plan. The theory behind this is that the closer the potential contaminant is to a drinking water intake, the quicker it can reach the intake, thus causing impairments and disruptions to the water system. The zones will also help to guide the implementation of best management practices upon completion of this Plan. Cragmont WC's Source Water Protection Areas are defined as:

Surface Water SWPA:

- 1. **Zone 1** is defined as a 1,000-foot-wide band on either side of Cub Creek and its tributaries upstream of the surface water diversion.
- 2. **Zone 2** extends 1/4 mile beyond each side of the boundary of Zone 1 (2,320 feet from the stream) upstream of the surface water diversion.
- 3. **Zone 3** is made up by the remainder of the Cub Creek Watershed boundary upstream of the surface water diversion.

The Source Water Protection Area is illustrated in the following map.

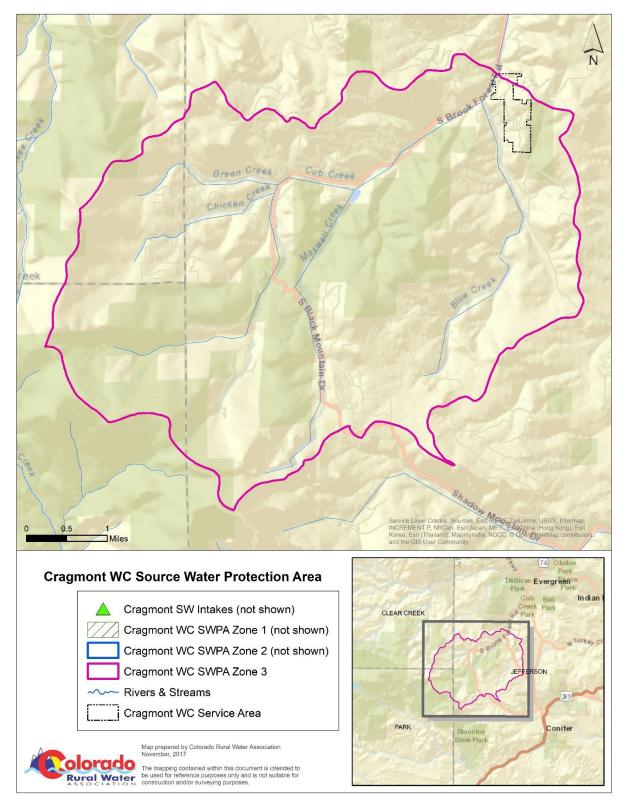


Figure 10: Cragmont WC Source Water Protection Area

Inventory of Potential Contaminant Sources and Other Issues of Concern

In 2001 – 2002, as part of the Source Water Assessment Report, a contaminant source inventory was conducted by the Colorado Department of Public Health and Environment to identify selected potential sources of contamination that might be present within the source water assessment areas. Discrete and dispersed contaminant sources were inventoried using selected state and federal regulatory databases, land use / land cover and transportation maps of Colorado. The contaminant inventory was completed by mapping the potential contaminant sources with the aid of a Geographic Information System (GIS).

The Cragmont WC was asked, by CDPHE, to review the inventory information, field-verify selected information about existing and new contaminant sources, and provide feedback on the accuracy of the inventory. Through this Source Water Protection Plan, the Cragmont WC is reporting its findings to the CDPHE.

After much consideration, discussion, and input from local stakeholders, the Cragmont WC and the Steering Committee have developed a more accurate and current inventory of contaminant sources located within the Source Water Protection Area and other issues of concern that may impact the Cragmont WC's drinking water sources.¹ In addition to the discrete and dispersed contaminant sources identified in the contaminant source inventory, the Steering Committee has also identified other issues of concern that may impact the Cragmont WC's drinking water sources (see Table 4: Potential Sources of Contamination and Issues of Concern Prioritization Table). Upon completion of this contaminant source inventory, the Cragmont WC has decided to adopt it in place of the original contaminant source inventory provided by the CDPHE.

Priority Strategy of Potential Contaminant Sources and Other Issues of Concern

After developing a contaminant source inventory and list of issues of concern that is more accurate, complete, and current, the Cragmont WC prioritized each item to guide the implementation of the best management practices outlined in this Source Water Protection Plan (see Table 5: Source Water Protection Best Management Practices). The prioritization ranking of each potential contaminant source or other issue of concern factored in the following criteria (as described below): the level of risk, the water system control, and the best management practices associated with each item.

- Risk The level of risk for each contaminant source is a measure of the water source's
 potential exposure to contamination. When prioritizing, a water system may assign a higher
 priority ranking to a potential contaminant source that has a higher risk level than one of lower
 risk level. The Cragmont WC utilized CRWA's SWAP Risk Assessment Matrix (Appendix C), which
 calculates the level of risk by estimating the following:
 - **Probability of Impact** The risk to the source waters increases as the relative probability of damage or loss increases. The probability of impact is determined by evaluating the number of contaminant sources, the migration potential or proximity to the water source, and the historical data. The following descriptions provide a

¹ The information contained in this Plan is limited to that available from public records and the Cragmont WC at the time that the Plan was written. Other potential contaminant sites or threats to the water supply may exist in the Source Water Protection Area that are not identified in this Plan. Furthermore, identification of a site as a "potential contaminant site" should not be interpreted as one that will necessarily cause contamination of the water supply.

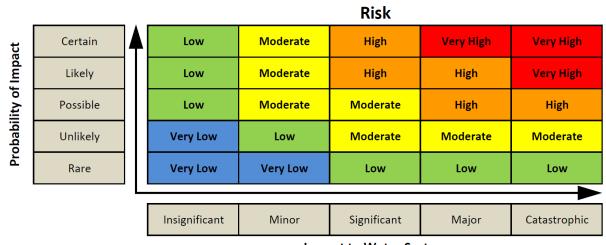
framework to estimate the relative probability that damage or loss would occur within one to ten years.

• **Certain**: >95% probability of impact

Likely: >70% to <95% probability of impact
 Possible: >30% to <70% probability of impact
 Unlikely: >5% to <30% probability of impact

• Rare: <5% probability of impact

- Impact to the Public Water System The risk to the source waters increases as the
 impact to the water system increases. The impact is determined by evaluating the
 human health concerns and potential volume of the contaminant source. CDPHE
 developed information tables to assist with this evaluation (Appendices D G). The
 following descriptions provide a framework to estimate the impact to the public water
 system.
 - Catastrophic irreversible damage to the water source(s). This could include the need for new treatment technologies and/or the replacement of existing water source(s).
 - Major substantial damage to the water source(s). This could include a loss of use for an extended period of time and/or the need for new treatment technologies.
 - **Significant** moderate damage to the water source(s). This could include a loss of use for an extended period of time and/or the need for increased monitoring and/or maintenance activities.
 - Minor minor damage resulting in minimal, recoverable, or localized efforts.
 This could include temporarily shutting off an intake or well and/or the issuance of a boil order.
 - Insignificant damage that may be too small or unimportant to be worth
 consideration, but may need to be observed for worsening conditions. This
 could include the development of administrative procedures to maintain
 awareness of changing conditions.



Impact to Water System

Figure 11: CRWA's SWAP Risk Assessment Matrix

- 2. **Control** The level of water system control describes the ability of the water system to take measures to prevent contamination or minimize impact. A potential contaminant source that falls within a water system's jurisdiction (i.e. direct control), may be of higher priority since they can take direct measures to prevent contamination or minimize the impact.
 - **Direct Control** The water system can take direct measures to prevent.
 - **Indirect Control** The water system cannot directly control the issue, but can work with another person or entity to take measures to prevent.
 - **No Control** The PSOC or issue of concern is outside the control of the public water system and other entities.
- 3. **Best Management Practices** BMPs are the actions that can be taken within the Source Water Protection Area to help reduce the potential risks of contamination to the community's source waters. The prioritization of the potential contaminant sources or issues of concern may be affected by the feasibility of implementing the BMPs that the Cragmont WC developed (Table 5: Source Water Protection Best Management Practices).

The Cragmont WC and Steering Committee ranked the potential contaminant source inventory and issues of concern in the following way:

Table 4: Potential Contaminant Sources and Issues of Concern Prioritization Table

Potential Contaminant Source or Issue of Concern	Probability of Impact (Rare, Unlikely, Possible, Likely, Certain)	Impact to Water System (Insignificant, Minor, Significant, Major, Catastrophic)	Risk (Very Low, Low, Intermediate, High, Very High)	Control (Direct, Indirect, No)	BMPs ²	Priority Ranking
Wildfire	Possible	Minor	Moderate	No		1
Onsite Wastewater Treatment Systems	Possible	Minor	Moderate	Indirect		1
Wastewater Treatment Unlikely		Minor	Low	Indirect		1
Residential Practices Rare		Minor	Very Low	Indirect		2
Roads Possible		Significant	Moderate	Indirect		2
Chemical De-Icers / Weed Rare		Insignificant	Very Low	Indirect		2
Security/Vandalism Unlikely		Major	Moderate	Indirect		3

² The prioritization of the potential contaminant sources or issues of concern may be affected by the feasibility of implementing the BMPs that were developed. See Table 5: Source Water Protection Best Management Practices for details.

DISCUSSION OF POTENTIAL CONTAMINANT SOURCES AND ISSUES OF CONCERN

The following section provides a brief description of potential contaminant sources and issues of concern that have been identified in this plan, describes the way in which they threaten the water source(s) and outlines best management practices.

Wildfire

Cragmont WC's SWPA contains heavily forested lands and wildfires are a high priority concern to the Steering Committee. Cragmont WC has not seen any effects to their drinking water sources due to wildfires, however if a major wildfire were to occur in the SWPA and surrounding lands, it could have an impact on the source waters by altering land cover and watershed hydrology. This can result in soil erosion and sediment and ash pollution in source water supplies, which present challenges to water treatment operations. Large rain events can produce mudslides, and debris flows capable of destroying water infrastructure and impacting water quality.

Chemicals used in fire retardants may also have a negative impact on drinking water sources. On December 31, 2011, the US Forest Service signed a new direction to approve the use of aerially applied fire retardant and implement an adaptive management approach that protects resources and improves the documentation of retardant effects through reporting, monitoring and application coordination on US Forest Service lands. Aerial retardant drops are not allowed in mapped avoidance areas for certain threatened, endangered, proposed, candidate, or sensitive (TEPCS) species or waterways. All waterways were given at least a 300-foot buffer avoidance area. A waterway is defined as a body of water including lakes, rivers, streams and ponds whether or not they contain aquatic life (U.S. Department of Agriculture Forest Service, June 2015).

Wildfire Best Management Practices Recommendations:

- Provide a copy of the final Source Water Protection Plan along with GIS shapefiles of the source water protection area to US Forest Service, Colorado State Forest Service, Colorado Division of Fire Prevention & Control, Evergreen Fire Protection District, and the Jefferson County Office of Emergency Management for consideration when planning and implementing wildfire mitigation projects.
- Educate homeowners about the importance of maintaining proper defensible space, fuel break thinning, etc.

Onsite Wastewater Treatment Systems

There are areas within Cragmont WC's SWPA that include properties that rely on onsite wastewater treatment systems (OWTS) to dispose of their sewage. An OWTS, commonly known as a septic system, consists of a septic tank that collects all the wastewater and a soil treatment area that disperses the liquid effluent onto a leach field for final treatment by the soil.

Unapproved, aging, and failing septic systems have a large impact on the quality and safety of the water supply. The failure of property owners to pump solids that accumulate in the septic tank may lead to premature failure of the soil treatment area. This in turn can cause untreated wastewater to back up into the home or to surface on the ground. If managed improperly, these residential septic systems can

contribute excessive nutrients, bacteria, pathogenic organisms, and chemicals to the groundwater. While OWTSs are the second most frequently cited source of groundwater contamination in our country, the Cragmont has not seen any impacts to their drinking water due to improper maintenance or failure of OWTSs.

In Jefferson County, individual sewage disposal systems are permitted by the Jefferson County Public Health Department. The Jefferson County Public Health Department administers and enforces the minimum standards, rules, and regulations under the authority of the On-Site Wastewater Treatment Act under Colorado State Statute 25-10-101. It is unknown at this time the number of septic systems within Jefferson County, the number of unapproved

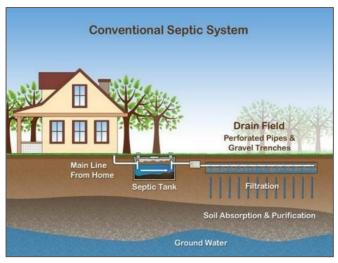


Figure 12: Conventional Septic System (Tri-County Health Department, 2016)

systems currently in use and the age of all septic systems in the county. The absence of effective monitoring and education increases the risk of excessive contaminants from OTWS entering the groundwater.

Unmaintained OWTS Best Management Practices Recommendations:

- Collaborate with the Jefferson County Building Department to locate and map all the active (and potentially inactive) OTWS within Zone 1 of the SWPA.
- Collaborate with the Jefferson County Public Health Department to provide OWTS owners within the source water protection area with educational material on the proper use and maintenance of their OWTS.
- Promote Jefferson County Drug Take-Back Days and consider hosting an event

Wastewater Treatment Facility

There is one upstream wastewater treatment facility (WWTF) within Cragmont WC's SWPA, located approximately 2.5 miles upstream from their drinking water intakes. The WWTF provides wastewater treatment for its customers and discharges treated water into Cub Creek. All water that is treated at a WWTF ultimately flows back into the environment, and thus the water quality that flows downstream from the plant must be good for aquatic life, recreation, and ultimately for human consumption (Plum Creek Water Reclamation Authority, 2017).

The CDPHE Water Quality Control Commission is authorized by section 25-8-205 C.R.S., under Regulation 85 (Nutrient Management Control Regulation), to promulgate control regulations to describe prohibitions, standards, concentrations, and effluent limitations on the extent of specifically identified pollutants that any person may discharge into any specific class of state waters (CDPHE Water Quality Control Commission, 2012). Reg. 85 contains nutrient effluent limits and nutrient monitoring requirements for WWTFs. According to available data, the upstream WWTF in currently in "significant violation" of compliance and is currently under enforcement orders. Cragmont WC continues to monitor the status of the upstream WWTF and has seen no impacts to their drinking water source.

Wastewater Treatment Facility Failure Best Management Practices Recommendations:

- Continue to rely on current enforcement of regulations at the state level.
- Develop an Emergency Notification card and share with the operators of upstream wastewater treatment plants to ensure that Cragmont are notified of spills quickly enough to shut off the wells to minimize impact from any incident.
- Meet with upstream WWTP to notify about them about source water protection efforts

Residential Practices

Cragmont WC's SWPA includes many residential properties. Common household practices including washing vehicles, lawn fertilization and pet wastes can allow chemicals and biologic pollutants to runoff residential property and enter the surface or ground water as indicated in Figure 13 below.

The Steering Committee believes that educating community members and decision-makers about source water protection efforts is essential to the prevention of drinking water contamination. Public education can help community members understand the potential threats to their drinking water sources and motivate them to participate as responsible citizens to protect their valued resources.

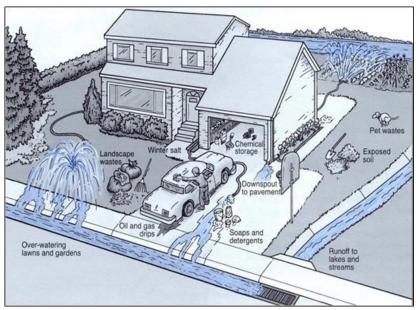


Figure 13: Residential Practices (Colorado State University Extension/NRCS, 2017)

Residential Practices Best Management Practices Recommendations:

- Collaborate with the Jefferson County Public Health Department to conduct public education
 and outreach programs for landowners and residents in the source water protection area to
 report issues and to encourage practices that will protect their drinking water source from
 potential contamination. This could include mailing educational water bill inserts, public
 presentations, website links, school presentations, etc.
- Promote Jefferson County Drug Take-Back Days and consider hosting an event
- Create a new homeowner packet for new residents to educate them on proper BMPs to protect source waters
- Continue to remain active on social media platforms such as NextDoor and Facebook

Roads

Cragmont WC's SWPA is served by a large network of roads and lie within state and county jurisdictions. These include Colorado State Highway 74 which is maintained by the Colorado Department of Transportation (CDOT); and county roads which are maintained by the Jefferson County Road & Bridge Department. The Steering Committee is concerned with impacts from these roadways affecting Cragmont WC's drinking water sources.

Motor vehicles, roads, and parking facilities are a major source of water pollution to both surface and groundwater. An estimated 46% of US vehicles leak hazardous fluids, including crankcase oil, transmission, hydraulic, and brake fluid, and antifreeze, as indicated by oil spots on roads and parking lots, and rainbow sheens of oil in puddles and roadside drainage ditches. An estimated 30-40% of the 1.4 billion gallons of lubricating oils used in automobiles are either burned in the engine or lost in drips and leaks, and another 180 million gallons are disposed of improperly onto the ground or into sewers. Runoff from roads and parking lots has a high concentration of toxic metals, suspended solids, and hydrocarbons, which originate largely from automobiles (Gowler & Sage, 2006). Storm water runoff over these roads can deliver contaminants from the road surface into the nearby groundwater.

Vehicular spills may occur along the transportation route within the SWPAs from trucks that transport fuels, waste, and other chemicals that have a potential for contaminating the groundwater. Chemicals from accidental spills are often diluted with water, potentially washing the chemicals into the soil and infiltrating into the groundwater. Roadways are also frequently used for illegal dumping of hazardous or other potentially harmful wastes. While Cragmont WC has not seen any impacts to their drinking water sources due to accidents on roadways, this a concern to them as impact to their system could be significant.

Accidents on Roadways Best Management Practices Recommendations:

- Develop an Emergency Notification card that contains current contact information for the public
 water system and map of drinking water intakes and the SWPA. Share with Emergency
 Responders (Colorado State Patrol, Colorado Department of Transportation, Jefferson County
 Road & Bridge Department, Jefferson County Office of Emergency Management, Evergreen
 Metro Fire Department, etc.) and other transit companies to ensure that Cragmont is notified of
 spills quickly enough to shut off the wells to minimize impact from the spill.
- Maintain current water system contact information, on an annual basis, with Emergency Responders to improve notification of spill response activities.
- Install Drinking Water Protection Area signs at strategic locations throughout source water protection area.
- Share copy of SWPP with Colorado Department of Transportation & Jefferson County Road & Bridge
- Present SWPP to Local Emergency Planning Commission

Chemical De-Icers & Weed Abatement on Roadways

Chemical De-Icers

During the winter season, CDOT may apply a salt-sand mixture and de-icer (magnesium chloride, M1000, or Ice Slicer), and Jefferson County Road & Bridge may apply a salt to routes within the SWPA.

Surface and groundwater quality problems resulting from the use of road de-icers can cause concern among federal, state, and local governments.

Salt contributes to increased chloride levels in groundwater through infiltration of runoff from roadways. Unlike other contaminants, such as heavy metals or hydrocarbons, chloride is not naturally removed from water as it travels through soil and sediments and moves towards the water table. Once in the groundwater, it may remain for a long time if groundwater velocity is slow and it is not flushed away. Chloride may also be discharged from groundwater into surface water and can account for elevated levels of chloride throughout the year, not just in winter. Thus, regardless of the path that the runoff takes, salt poses a water quality problem.

Dust Abatement on Roads

Dust abatement containing magnesium chloride may be applied to unpaved county roads within the Source Water Protection Area. Dust suppressants abate dust by changing the physical properties of the road surface by creating a hard, compact surface that resists potholing, rutting, and loss of aggregate. The use of chemical dust suppressants prevents road particulates from becoming airborne.

Magnesium chloride, used in dust abatement, is highly soluble in water and has the potential to move through the soil with water. The movement is dependent on the rate and frequency of rainfall, the drainage characteristics, and soil type. If the soil surface is not bound together well or if the rain event is extreme, dust suppressant treated soil particles can be carried by overland flow into streams, rivers, and ditches. Potential water quality impacts include elevated chloride concentrations in streams downstream of application areas and shallow groundwater contamination (US Environmental Protection Agency, 2002).

Weed Abatement

The Jefferson County Road and Bridge Department is responsible for roadside noxious weed control within Cragmont WC's SWPA, and the Jefferson County Invasive Species Management program helps the public by developing integrated management plans to control mountain pine beetle and noxious weeds. Homeowners are responsible for weed abatement on private property.

Weeds can be managed by using a combination of control methods including mechanical, cultural, biological, preventive and chemical. Different species of noxious weeds grow or spread differently, so not all methods will be effective on all weeds. Colorado's Noxious Weed Act requires that certain methods of control be used depending on the level of control that is mandated.

- Mechanical control involves cutting, mowing, disking.
- Cultural controls use materials or techniques that reduce noxious weed populations. Examples include mulching, rotational grazing, and establishing good vegetation cover.
- Biological control uses organisms (insects, mites, diseases and grazing animals) which feed only on specific noxious weeds.
- Prevention includes planting weed free seed, mulching with weed free material, cleaning machinery before moving between sites and controlling weeds prior to their setting seed.
- Chemical control involves the use of herbicides (Colorado Weed Management Association, 2016)

Cragmont WC tests for herbicides annually and has not seen any impact to their drinking water sources from herbicides or other methods of weed abatement. However, there have been testing holes set up in

the areas surrounding the SWPA and there are indications of herbicides moving through the groundwater.

Chemical De-Icers & Weed Abatement Best Management Practices Recommendations:

- Develop an Emergency Notification card that contains current contact information for the public
 water system and map of drinking water intakes and the SWPA. Share with Jefferson County,
 Colorado Department of Transportation and the US Forest Service in an effort to facilitate
 contact in the event of a spill as well as enlist their support in the protection of the source water
 intakes.
- Educate homeowners on the proper use of pesticides/herbicides

Security/Vandalism

Although there have been no major acts of vandalism to Cragmont WC's water supplies, this is still a concern for the Steering Committee. While the probability for these acts to occur is rare, this remains a concern, as the impacts could be major. Water infrastructure could be targeted directly, or water can be contaminated through the introduction of poisonous chemicals or disease-causing biological agents (Gleick, 2006). The Steering Committee recommends replacing or installing new signage, fencing, and security gates to the area as well as placing security cameras or motion lighting and alarms at or near intakes.

Security Best Management Practices Recommendations:

- Work to improve security on all wellheads and critical equipment. This could include fencing and intrusion alarms or surveillance system.
- Remain vigilant to recognize if/when vandalism/tampering occurs.
- Install Drinking Water Protection Area signs at strategic locations throughout source water protection area.
- Share Source Water Protection Plan and maps with area law enforcement.
- Empower residents to expand neighborhood watch program

SOURCE WATER BEST MANAGEMENT PRACTICES

The Steering Committee reviewed and discussed several possible best management practices that could be implemented within the Source Water Protection Area to help reduce the potential risks of contamination to the community's source water. The Steering Committee established a "common sense" approach in identifying and selecting the most feasible source water management activities to implement locally. The best management practices were obtained from multiple sources including: Environmental Protection Agency, Colorado Department of Public Health and Environment, Natural Resources Conservation Service, and other source water protection plans.

The Steering Committee recommends the best management practices listed in the following table be considered for implementation.

Table 5: Source Water Protection Best Management Practices

Issues	Priority Ranking	Best Management Practices		
Wildfire	1	 Provide a copy of the final Source Water Protection Plan along with GIS shapefiles of the source water protection area to US Forest Service, Colorado State Forest Service, Colorado Division of Fire Prevention & Control, Evergreen Fire Protection District, and the Jefferson County Office of Emergency Management for consideration when planning and implementing wildfire mitigation projects. Educate homeowners about the importance of maintaining proper defensible space, fuel break thinning, etc. 		
Onsite Wastewater Treatment Systems	1	 Collaborate with the Jefferson County Building Department to locate and map all the active (and potentially inactive) OTWS within Zone 1 of the SWPA. Collaborate with the Jefferson County Public Health Department to provide OWTS owners within the source water protection area with educational material on the proper use and maintenance of their OWTS. Promote Jefferson County Drug Take-Back Days and consider hosting an event 		
Wastewater Treatment Plant	1	 Continue to rely on current enforcement of regulations at the state level. Develop an Emergency Notification card and share with the operators of upstream wastewater treatment plants to ensure that Cragmont are notified of spills quickly enough to shut off the wells to minimize impact from any incident. Meet with upstream WWTP to notify about them about source water protection efforts 		
Residential Practices	2	 Collaborate with the Jefferson County Public Health Department to conduct public education and outreach programs for landowners and residents in the source water protection area to report issues and to encourage practices that will protect their drinking water source from potential contamination. This could include mailing educational water bill inserts, public presentations, website links, school presentations, etc. Promote Jefferson County Drug Take-Back Days and consider hosting an event Create a new homeowner packet for new residents to educate them on proper BMPs to protect source waters Continue to remain active on social media platforms such as NextDoor and Facebook 		
Roads	2	Develop an Emergency Notification card that contains current contact information for the public water system and map of drinking water intakes and the SWPA. Share with Emergency Responders (Colorado		

Issues	Priority Ranking	Best Management Practices		
		 State Patrol, Colorado Department of Transportation, Jefferson County Road & Bridge Department, Jefferson County Office of Emergency Management, Evergreen Metro Fire Department, etc.) and other transit companies to ensure that Cragmont is notified of spills quickly enough to shut off the wells to minimize impact from the spill. Maintain current water system contact information, on an annual basis, with Emergency Responders to improve notification of spill response activities. Install Drinking Water Protection Area signs at strategic locations throughout source water protection area. Share copy of SWPP w/ Colorado Department of Transportation & Jefferson County Road & Bridge Present SWPP to Local Emergency Planning Commission 		
Chemical De-Icers / Weed Abatement	2	 Develop an Emergency Notification card that contains current contact information for the public water system and map of drinking water intakes and the SWPA. Share with Jefferson County, Colorado Department of Transportation and the US Forest Service in an effort to facilitate contact in the event of a spill as well as enlist their support in the protection of the source water intakes. Educate homeowners on the proper use of pesticides/herbicides 		
Security/Vandalism	3	 Work to improve security on all wellheads and critical equipment. This could include fencing and intrusion alarms or surveillance system. Remain vigilant to recognize if/when vandalism/tampering occurs. Install Drinking Water Protection Area signs at strategic locations throughout source water protection area. Share Source Water Protection Plan and maps with area law enforcement. Empower residents to expand neighborhood watch program 		

EVALUATING EFFECTIVENESS OF SOURCE WATER PROTECTION PLAN

The Cragmont WC is committed to evaluating the effectiveness of the various source water best management practices that have been implemented. The purpose of evaluating the effectiveness is to determine if the various source water best management practices are being achieved, and if not, what adjustments to the Source Water Protection Plan will be taken in order to achieve the intended outcomes. It is further recommended that this Plan be reviewed at a frequency of once every three to five years or if circumstances change resulting in the development of new water sources and source water protection areas, or if new risks are identified.

The Cragmont WC is committed to a mutually beneficial partnership with the Colorado Department of Public Health and Environment in making future refinements to their source water assessment and to revise the Source Water Protection Plan accordingly based on any major refinements.

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APPENDICES³

- A. Source Water Assessment Report
- B. Source Water Assessment Report Appendices
- C. CRWA's SWAP Risk Assessment Matrix
- D. Table A-1 Discrete Contaminant Types
- E. Table A-2 Discrete Contaminant Types (SIC Related)
- F. Table B-1 Dispersed Contaminant Types
- G. Table C-1 Contaminants Associated with Common PSOC's
- H. MOU Between CDPHE and U.S. Forest Service Rocky Mountain Region

 $^{^{\}rm 3}$ All appendices are located on the CD version of this SWPP.