COLORADO
Colorado Water Conservation Board
Department of Natural Resources

Colorado Water Conservation Board

Water Plan

Water Project Summary

Name of Applicant	Fort Collins Conservation District
Name of Water Project	Project-01859 -Cache La Poudre Basin Nutrient Trading Pilot
Grant Request Amount	**$125,000.00**
Primary Category	$75,000.00
Agricultural Projects	
Additional Funding Category	$50,000.00
Conservation & Land Use Planning	
Total Applicant Match	**$116,000.00**
Applicant Cash Match	$40,160.00
Applicant In-Kind Match	$75,840.00
Total Other Sources of Funding	**$0.00**
Total Project Cost	**$241,000.00**

Applicant & Grantee Information

Name of Grantee: Fort Collins Conservation District
Mailing Address: 2150 Centre Ave Bld A Ste 116 Fort Collins CO 80526
FEIN: 846,013,752

Organization Contact: Zach Thode
Position/Title: Board Member
Phone: 9707441444
Email: zthode@lehiwater.com

Organization Contact - Alternate: Debi Randol
Position/Title:
Phone: 970-576-5206
Email: debi@bigthompson.org

Grant Management Contact: Zach Thode
Position/Title: Board Member
Phone: 9707441444
Email: zthode@lehiwater.com

Engineering Contact: Zach Thode
Position/Title: Board Member
Phone: 9707441444
Email: zthode@lehiwater.com

Description of Grantee/Applicant

No description provided

Type of Eligible Entity

- ☐ Public (Government)
- ■ Public (District)

- [ ] Public (Municipality)
- [ ] Ditch Company
- [ ] Private Incorporated
- [ ] Private Individual, Partnership, or Sole Proprietor
- [ ] Non-governmental Organization
- [ ] Covered Entity
- [ ] Other

Category of Water Project

- [x] Agricultural Projects
  Developing communications materials that specifically work with and educate the agricultural community on headwater restoration, identifying the state of the science of this type of work to assist agricultural users among others.
- [x] Conservation & Land Use Planning
  Activities and projects that implement long-term strategies for conservation, land use, and drought planning.
- [ ] Engagement & Innovation Activities
  Activities and projects that support water education, outreach, and innovation efforts. Please fill out the Supplemental Application on the website.
- [ ] Watershed Restoration & Recreation
  Projects that promote watershed health, environmental health, and recreation.
- [ ] Water Storage & Supply
  Projects that facilitate the development of additional storage, artificial aquifer recharge, and dredging existing reservoirs to restore the reservoirs' full decreed capacity and Multi-beneficial projects and those projects identified in basin implementation plans to address the water supply and demand gap.

Location of Water Project

Latitude	40.560380
Longitude	-105.082739
Lat Long Flag	Default/Proponent headquarters: If the location cannot be defined with flags above, use location of project proponent headquarters
Water Source	Irrigation Supplies in the Cache la Poudre Basin
Basins	South Platte
Counties	Weld; Larimer
Districts	3-Cache La Poudre River

Water Project Overview

Major Water Use Type	Agricultural
Subcategory	Planning (e.g. watershed)
Scheduled Start Date - Design	5/1/2022
Scheduled Start Date - Construction	

Description

The intent is to determine how to have a better water quality solution for a whole basin than just spending millions on point source discharges and look to reduce nutrient loading on the river as a whole by paying farmers and park systems to do better practices to reduce nutrient loading.

The struggle is:
How does one coordinate this? (with farmers that operate independently and don't want to expose too much

information)
Who actually verifies the practices?
What or how much is the incentive?
How long do the terms need to be to satisfy CDPHE?
The Benefit is:
Better water quality for the basin
There isn't so much money spent on removing a small amount of nutrient, but a much larger scale
Farmers get paid to do a good job
Farmers don't have to get individual contracts with the Municipality (there is currently a trust problem here)
Local economic externalities
Maybe we could fit in some rotational fallow or cover cropping into the program to provide additional water supply

I am thinking that the Conservation Districts are the solution; they could have a number of acres of farms and parks contracted to practice certain nutrient management activities and validate them with the NRCS, and use some existing groundwater modelling to show impact timing and loading.

Costs would be:
Payments to the Farmer, or Parks
Administration (for all involved)
Agronomist to develop practices and validate
Engineering to develop model and validate accuracy
CDPHE time to approve of process

Measurable Results

	New Storage Created (acre-feet)
	New Annual Water Supplies Developed or Conserved (acre-feet), Consumptive or Nonconsumptive
	Existing Storage Preserved or Enhanced (acre-feet)
	New Storage Created (acre-feet)
105,000	Length of Stream Restored or Protected (linear feet)
	Efficiency Savings (dollars/year)
	Efficiency Savings (acre-feet/year)
	Area of Restored or Preserved Habitat (acres)
	Quantity of Water Shared through Alternative Transfer Mechanisms or water sharing agreement (acre-feet)
300,000	Number of Coloradans Impacted by Incorporating Water-Saving Actions into Land Use Planning
300,000	Number of Coloradans Impacted by Engagement Activity

Water Project Justification

This project is a very innovative pilot project to prove a concept that would greatly benefit ag producers for being good stewards, urban water providers by reducing the costs of removing additional amounts of nutrients from the wastewater stream, and lastly benefit the environment by reducing the tmdl loads on the river beyond just single point locations.

Related Studies

There is related studies of nutrient trading in the Midwest where nutrient management is much more difficult and creates much larger environmental problems. This project would leverage some of the methods of how to account for these programs, model the flows, and recognize/prove/quantify the best management practices into a

tangible value. The CDPHE has administrative language built into their regulations to accommodate for nutrient trading, but have never been able to align all the parties to take advantage of this opportunity; having The Conservation District as the convener of this pilot creates a new and unique opportunity to isolate some of the individuals farmers from direct engagement with CDPHE and the Water Providers.

Taxpayer Bill of Rights

The Conservation District is anticipating running a Mill-levy to the voters in 2022 that would provide some additional inkind funding for this type of Project.

Budget and Schedule

This Statement of Work shall be accompanied by a combined Budget and Schedule that reflects the Tasks identified in the Statement of Work and shall be submitted to CWCB in excel format.

Reporting Requirements

Progress Reports: The applicant shall provide the CWCB a progress report every 6 months, beginning from the date of issuance of a purchase order, or the execution of a contract. The progress report shall describe the status of the tasks identified in the statement of work, including a description of any major issues that have occurred and any corrective action taken to address these issues.

Final Report: At completion of the project, the applicant shall provide the CWCB a Final Report on the applicant's letterhead that: (1) Summarizes the project and how the project was completed. (2) Describes any obstacles encountered, and how these obstacles were overcome. (3) Confirms that all matching commitments have been fulfilled. (4) Includes photographs, summaries of meetings and engineering reports/designs. The CWCB will pay out the last 10% of the budget when the Final Report is completed to the satisfaction of CWCB staff. Once the Final Report has been accepted, and final payment has been issued, the purchase order or grant will be closed without any further payment.

Payment

Payment will be made based on actual expenditures and must include invoices for all work completed. The request for payment must include a description of the work accomplished by task, an estimate of the percent completion for individual tasks and the entire Project in relation to the percentage of budget spent, identification of any major issues, and proposed or implemented corrective actions. Costs incurred prior to the effective date of this contract are not reimbursable. The last 10% of the entire grant will be paid out when the final deliverable has been received. All products, data and information developed as a result of this contract must be provided to as part of the project documentation.

Performance Measures

Performance measures for this contract shall include the following: (a) Performance standards and evaluation: Grantee will produce detailed deliverables for each task as specified. Grantee shall maintain receipts for all project expenses and documentation of the minimum in-kind contributions (if applicable) per the budget in the Budget & Schedule Exhibit B. Per Water Plan Grant Guidelines, the CWCB will pay out the last 10% of the budget when the Final Report is completed to the satisfaction of CWCB staff. Once the Final Report has been accepted, and final payment has been issued, the purchase order or grant will be closed without any further payment. (b) Accountability: Per Water Plan Grant Guidelines full documentation of project progress must be submitted with each invoice for reimbursement. Grantee must confirm that all grant conditions have been complied with on each invoice. In addition, per Water Plan Grant Guidelines, Progress Reports must be

submitted at least once every 6 months. A Final Report must be submitted and approved before final project payment. (c) Monitoring Requirements: Grantee is responsible for ongoing monitoring of project progress per Exhibit A. Progress shall be detailed in each invoice and in each Progress Report, as detailed above. Additional inspections or field consultations will be arranged as may be necessary. (d) Noncompliance Resolution: Payment will be withheld if grantee is not current on all grant conditions. Flagrant disregard for grant conditions will result in a stop work order and cancellation of the Grant Agreement.

COLORADO
Colorado Water Conservation Board
Department of Natural Resources

Last Updated: May 2021

Colorado Water Conservation Board
Water Plan Grant – Statement of Work – Exhibit A

Statement Of Work	
Date:	**11/30/2021**
Name of Grantee:	**Fort Collins Conservation District**
Name of Water Project:	**Cache La Poudre Nutrient Trading Pilot Project**
Funding Source:	**Colorado Water Plan Grants**
Water Project Overview:	

How to have a better water quality solution for a whole basin than just spending millions on point source discharges and look to reduce nutrient loading on the river as a whole by paying farmers and park systems to do better practices to reduce nutrient loading.

The struggle is:

1. **How does one coordinate this? (with farmers that operate independently and don't want to expose too much information)**
2. **Who actually verifies the practices?**
3. **What or how much is the incentive?**
4. **How long do the terms need to be to satisfy CDPHE?**

The Benefit is:

1. **Better water quality for the basin**
2. **There isn't so much money spent on removing a small amount of nutrient, but a much larger scale**
3. **Farmers get paid to do a good job**
4. **Farmers don't have to get individual contracts with the Municipality (there is currently a trust problem here)**
5. **Local economic externalities**
6. **Maybe we could fit in some rotational fallow or cover cropping into the program to provide additional water supply**

I am thinking that the Conservation Districts are the solution; they could have a number of acres of farms and parks contracted to practice certain nutrient management activities and validate them with the NRCS, and use some existing groundwater modelling to show impact timing and loading.

Costs would be:

1. **Payments to the Farmer, or Parks**
2. **Administration (for all involved)**
3. **Agronomist to develop practices and validate**
4. **Engineering to develop model and validate accuracy**
5. **CDPHE time to approve of process**

Last Updated: May 2021

Project Objectives:
This project should be able to improve watershed health by reducing nutrient loads in more of the river, while reducing costs to the water providers by eliminating costly improvements to waste water treatment plants. This will also provide a mechanism to provide economic sustainability for ag producers to use improved best practices.

Tasks
Task 1 – [Collaboration of Water Providers and CDPHE]
Description of Task:
This task is to convene workshops with the water providers, CDPHE, and the project coordinators to understand the limits of operation within this pilot project. A successful collaboration will yield an understanding of how discharge permits can be adjusted to make a pilot project effective.
Method/Procedure:
The plan would be to hold regional meetings to discuss costs/options for the pilot with CDPHE regulators.

Last Updated: May 2021

Deliverable:
Report with approval from CDPHE for the structure of a temporary pilot project to analyze how nutrient trading can be implemented.

Tasks
Task 2 – [Farmer Engagement]
Description of Task:
The project coordinator will engage with farmers in the upper Poudre Basin to understand willingness to provide acres to a pilot project. Initial conversations about BMP's will be held to understand costs and willingness to adopt management practices that will meet the requirements of the pilot project.
Method/Procedure:

The project coordinator will meet one on one with several farmers to understand operations and how improving management practices will both improve their operation and also provide an economic incentive to make changes to operations.
Deliverable:
After meeting with several upper basin farmers, the Conservation District will be able to identify a sustainable number of acres that could be included in the Pilot Project.

Repeat for Task 3, Task 4, Task 5, etc.

Tasks
Task 3 – [BMP development]
Description of Task:
The project engineers will work with the NRCS to develop an approved list of best management practices that can be used by the ag producers to reduce nutrient loading on the river. These BMP's will be discussed with the ag producers to understand their viability and economic impact.
Method/Procedure:

Collaboration on existing practices, and using NRCS practices to further enhance a working toolbox of management practices that can be used to meet the objectives of the pilot project.
Deliverable:
A toolbox of Best Management Practices will be developed for ag producers to use in making management decisions.

Tasks
Task 4 – [Modelling]
Description of Task:
The project engineers will work with a hydraulic modeling consultant to develop a model of how the improved return flows will engage with the river to ensure that the improved water quality matches the requirements of the CDPHE pilot parameters. This model will demonstrate timing and locations of return flows from regions of farmers within the Conservation District and above the Water Providers discharge points.
Method/Procedure:

The method for this task is to improve upon existing and accepted models to create a toolbox model that will be utilized as a part of pilot permitting to ensure that stream nutrient loads are in fact reduced.
Deliverable:
There will be an interactive model that allows for regional inputs for crops and management practices, as well as pilot parameters for nutrient loading to produce an output for approval by the CDPHE.

Tasks
Task 5 – [Permitting]
Description of Task:
The water providers will work with CDPHE to establish pilot permits that will allow for this trading to be monitored and ensure that there isn't lapses in point discharge requirements.
Method/Procedure:

Using the models, management toolboxes and existing point source permits, the water providers can establish expected criteria for a pilot discharge permit. The intent of this task is to understand how to implement a long term permit utilizing nutrient trading.
Deliverable:
The project will deliver a pilot discharge permit, and a process for establishing longterm permits utilizing nutrient trading.

Tasks
Task 6 – [Monitoring]
Description of Task:
The project coordinator will work with NRCS to establish a robust monitoring program that can be implemented by the NRCS to validate that ag producers are following best practices from the toolbox to ensure that the inputs into the model are accurate.
Method/Procedure:

Field monitoring will be completed on the farms based upon what the management practices are that have been implemented to then report back to the engineers exactly what the inputs to the model should be.
Deliverable:
Monitoring reports that can be used as inputs to the return flow model.

Tasks
Task 7 – [Reporting]
Description of Task:
The project team will develop a report to address the takeaways from each of the previous tasks, and to establish how successful or unsuccessful this pilot project is. The report shall establish a cost benefit analysis to nutrient trading in the basin, and also how successful the project was at reducing nutrients in the river.
Method/Procedure:

Through team efforts this data will be merged together to provide a succinct and reliable report.

Deliverable:

The final report will provide a decision support tool to better understand the feasibility to further pursue nutrient trading as a long term solution to degrading water quality in river basins across the state.

Budget and Schedule

This Statement of Work shall be accompanied by a combined Budget and Schedule that reflects the Tasks identified in the Statement of Work and shall be submitted to CWCB in excel format.

Reporting Requirements

Progress Reports: The applicant shall provide the CWCB a progress report every 6 months, beginning from the date of issuance of a purchase order, or the execution of a contract. The progress report shall describe the status of the tasks identified in the statement of work, including a description of any major issues that have occurred and any corrective action taken to address these issues.

Last Updated: May 2021

Final Report: At completion of the project, the applicant shall provide the CWCB a Final Report on the applicant's letterhead that:

- Summarizes the project and how the project was completed.
- Describes any obstacles encountered, and how these obstacles were overcome.
- Confirms that all matching commitments have been fulfilled.
- Includes photographs, summaries of meetings and engineering reports/designs.

The CWCB will pay out the last 10% of the budget when the Final Report is completed to the satisfaction of CWCB staff. Once the Final Report has been accepted, and final payment has been issued, the purchase order or grant will be closed without any further payment.

Payment

Payment will be made based on actual expenditures and must include invoices for all work completed. The request for payment must include a description of the work accomplished by task, an estimate of the percent completion for individual tasks and the entire Project in relation to the percentage of budget spent, identification of any major issues, and proposed or implemented corrective actions.

Costs incurred prior to the effective date of this contract are not reimbursable. The last 10% of the entire grant will be paid out when the final deliverable has been received. All products, data and information developed as a result of this contract must be provided to as part of the project documentation.

Performance Measures

Performance measures for this contract shall include the following:
(a) Performance standards and evaluation: Grantee will produce detailed deliverables for each task as specified. Grantee shall maintain receipts for all project expenses and documentation of the minimum in-kind contributions (if applicable) per the budget in Exhibit C. Per Grant Guidelines, the CWCB will pay out the last 10% of the budget when the Final Report is completed to the satisfaction of CWCB staff. Once the Final Report has been accepted, and final payment has been issued, the purchase order or grant will be closed without any further payment.
(b) Accountability: Per Grant Guidelines full documentation of project progress must be submitted with each invoice for reimbursement. Grantee must confirm that all grant conditions have been complied with on each invoice. In addition, per Grant Guidelines, Progress Reports must be submitted at least once every 6 months. A Final Report must be submitted and approved before final project payment.
(c) Monitoring Requirements: Grantee is responsible for ongoing monitoring of project progress per Exhibit A. Progress shall be detailed in each invoice and in each Progress Report, as detailed above. Additional inspections or field consultations will be arranged as may be necessary.
(d) Noncompliance Resolution: Payment will be withheld if grantee is not current on all grant conditions. Flagrant disregard for grant conditions will result in a stop work order and cancellation of the Grant Agreement.

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Department of Natural Resources

Colorado Water Conservation Board

Water Plan Grant - Exhibit C
Budget and Schedule

Prepared Date:11/30/21

Name of Applicant: Fort Collins Conservation District

Name of Water Project: Cache La Poudre Nutrient Trading Pilot Project

Project Start Date: 05/01/2022

Project End Date: 05/01/2025

Task No.	Task Description	Task Start Date	Task End Date	Grant Funding Request	Match Funding	Total
1	Collaboration of Water Providers and CDPHE	5/1/2022	5/1/2025		$25,000	$25,000
2	Farmer Engagement	10/1/22	1/1/2024	$23,600		$23,600
3	BMP development	6/1/2022	1/1/2023	$15,100	$12,000	$27,100
4	Modelling	6/1/2022	1/1/2023	$42,000	$20,000	$62,000
5	Permitting	6/1/2022	1/1/2023	$25,300	$30,000	$55,300
6	Monitoring	4/1/2023	1/1/2025		$25,000	$25,000
7	Reporting	1/1/2025	5/1/2025	$35,960	$5,000	$40,960
						$0
						$0
						$0
						$0
						$0
						$0
			Total	$141,960	$117,000	$258,960

COLORADO
Colorado Water Conservation Board
Department of Natural Resources

Colorado Water Conservation Board

Water Plan Grant - Detailed Budget Estimate
Fair and Reasonable Estimate

Prepared Date: 11/30/2021
Name of Applicant: Fort Collins Conservation District
Name of Water Project: Cache La Poudre Nutrient Trading Pilot Project

EXAMPLE B: Engineering

Task 1 - Engineering	Water Consultants						Subcontracts					
Sub-task	Senior Principal Engineer	Water Provider Water Resource Engineer	Senior Water Resources Engineer/ Consultant	Water Resources Engineer	Administrator	Subtotal	Lump sum	Environmental and Cultural Resources	(Other)	Subtotal	Project Total	CWCB Funds / Matching Funds
	$ 190	$ 160	$ 160	$ 130	$ 100		Cost per	Lump Sum				
	Estimated Hours											
Project Initiation / Stakeholder identification	12	50	50	50	16	**$ 26,380**				**$ -**	$26,380	
Farmer Engagement		50		120		**$ 23,600**					$23,600	
BMP implementation	10	40	20	120		**$ 27,100**					$27,100	
Return Flow Modelling	50	50	50	150	50	**$ 50,000**			$ 12,000	**$ 12,000**	$62,000	
Permitting	20	200	50	50	50	**$ 55,300**				**$ -**	$55,300	
Project Management	50	30	30		24	**$ 21,500**				**$ -**	$21,500	
Report, Conclusions, & Recommendations	40	54	54	16	40	**$ 30,960**			$ 10,000	**$ 10,000**	$40,960	
	$ 34,580.00	$ 75,840.00	$ 40,640.00	$ 65,780.00	$ 18,000.00	$ 234,840.00						
Task 2 - ?												
TOTAL											**$256,840**	

Gmail Zach Thode <zthode@lehiwater.com>

Answer Some Questions on Nutrient Trading?

Diker - CDPHE, Kenan <kenan.diker@state.co.us> Wed, Jun 16, 2021 at 12:21 PM
To: CAWA Colorado Ag Water Alliance <coagwater@gmail.com>
Cc: Zach Thode <zthode@lehiwater.com>

Hey Greg and Zack,

Glad to hear that there are some considerations for nutrient trading out there. I am sending you a link for the trading policy for Colorado.

https://www.colorado.gov/pacific/sites/default/files/WQ_Pollutant-Trading-Policy.pdf

Nutrient trading can be done under Water Quality Control Commission Policy 17.1 (link below, Section X). This really depends on the municipality's opting in or out for the program.

https://drive.google.com/file/d/1u750955JR2XQTLdxnJjKebP12oRKQwL5/view

I and potentially some other(s) from the division will be happy to meet and discuss it.

Zack, please let me know if that would work for you and glad to meet you!!

Thanks
Kenan
[Quoted text hidden]
--
Kenan Diker
Agricultural Water Quality Specialist
Protection and Restoration Unit

P 303.692.3597
4300 Cherry Creek Drive South, Denver, CO 80246
kenan.diker@state.co.us | www.colorado.gov/cdphe/wqcd

Nutrient Trading Pilot

Diker - CDPHE, Kenan <kenan.diker@state.co.us> Fri, Jul 9, 2021 at 8:56 AM
To: Zach Thode <zthode@lehiwater.com>
Cc: Roy Otto <Roy.Otto@greeleygov.com>, adam.jokerst@greeleygov.com, jarndt@fcgov.com, "Adams, Sam - NRCS, Fort Collins, CO" <sam.adams@co.usda.gov>, Donnie Dustin <DDUSTIN@fcgov.com>, "Owsley, William - NRCS, Greeley, CO" <william.owsley@usda.gov>, Gregory Peterson <petersongap@comcast.net>, DOUGLAS J Ochsner <dougochsner@msn.com>, Greg Kernohan <gkernohan@ducks.org>, John Kefalas <kefalajm@co.larimer.co.us>

Hey all,

Thanks for the communication about the potential nutrient trading. There are two paths as of not in the nutrient trading in Colorado:
1) It is under Colorado Pollutant Trading Policy (https://www.colorado.gov/pacific/sites/default/files/WQ_Pollutant-Trading-Policy.pdf). Expectation would be meeting all the requirements in the policy. Currently there is not a lot of pollutant trading going on in Colorado. The trading policy is primarily focused on nutrients, but because Colorado hasn't had state-wide nutrient criteria, this type of trading has been limited to only a few reservoir watersheds that had reservoir nutrient criteria and some control regulations with phosphorus. This option will be an involved one for sure.

2)The other option is trading/nutrient credit building for WWTFs under Policy 17-1 (https://drive.google.com/file/d/1u750955JR2XQTLdxnJjKebP12oRKQwL5/view) which would have been relatively simpler but it required opting-in and as far as I know no facility in the area opted-in for the program in this nature. There are a couple of other facilities that are interested in this one.

Addressing Zack's suggestions / questions would be a good part of any proposal for trading to be comprehensive enough to satisfy policy requirements (option 1). Division's permit unit and (maybe engineering section) will be an integral part of trading communications, reviewing a proposal and approval of it.

Thanks,

Kenan

Colorado is in the process of adopting nutrient criteria more broadly, so trading may come up in the future.
[Quoted text hidden]

--

Kenan Diker
Agricultural Water Quality Specialist
Protection and Restoration Unit

P 303.692.3597
4300 Cherry Creek Drive South, Denver, CO 80246
kenan.diker@state.co.us | www.colorado.gov/cdphe/wqcd

Nutrient Trading Pilot

Jeni Arndt <jarndt@fcgov.com> Mon, Jul 19, 2021 at 1:07 PM
To: Greg Kernohan <gkernohan@ducks.org>
Cc: Zach Thode <zthode@lehiwater.com>, Roy Otto <Roy.Otto@greeleygov.com>, "adam.jokerst@greeleygov.com" <adam.jokerst@greeleygov.com>, "Adams, Sam - NRCS, Fort Collins, CO" <sam.adams@co.usda.gov>, Donnie Dustin <DDUSTIN@fcgov.com>, "kenan.diker@state.co.us" <kenan.diker@state.co.us>, "Owsley, William - NRCS, Greeley, CO" <william.owsley@usda.gov>, Gregory Peterson <petersongap@comcast.net>, DOUGLAS J Ochsner <dougochsner@msn.com>, John Kefalas <kefalajm@co.larimer.co.us>

Dear All,

Thank you for including me in this thread. I am following along . . . .and very supportive.

Kindly,

Jeni

Jeni Arndt, Mayor of Fort Collins
970-413-3146

> On Jul 7, 2021, at 9:59 AM, Greg Kernohan <gkernohan@ducks.org> wrote:
>
> Good morning, Zach et al;
>
> This is probably my number one priority for our program and would be extremely interested in helping move the ball forward. Let's get together in the near future.
>
> Warmly,
> Greg

Greg Kernohan, Director
Conservation Programs
Ecosystem Services

1825 Sharp Point Dr. Suite 118
Fort Collins, CO 80525

970-481-7793 (c)
gkernohan@ducks.org

[Quoted text hidden]

Gmail Zach Thode <zthode@lehiwater.com>

Nutrient Trading Pilot

John Kefalas <kefalajm@co.larimer.co.us> Fri, Jul 23, 2021 at 1:58 PM
To: Zach Thode <zthode@lehiwater.com>

Zach,

What do you see as the County's role in this effort? Do you think the ESAB can help with some of the research and analysis? I did mention this nutrient trading concept to the Chair and Vice Chair and the staff liaison when we met a couple of weeks ago. Thank you.

LARIMER COUNTY

John Kefalas
County Commissioner, District 1

Commissioners' Office
200 W Oak St | 2nd Floor
PO Box 1190, Fort Collins, CO 80522-1190
W: (970) 498-7001
Cell: (720) 254-7598
jkefalas@larimer.org | www.larimer.org

[Quoted text hidden]

Gmail Zach Thode <zthode@lehiwater.com>

Nutrient Trading Pilot

Greg Kernohan <gkernohan@ducks.org> Wed, Jul 7, 2021 at 9:59 AM
To: Zach Thode <zthode@lehiwater.com>, Roy Otto <Roy.Otto@greeleygov.com>, "adam.jokerst@greeleygov.com" <adam.jokerst@greeleygov.com>, "jarndt@fcgov.com" <jarndt@fcgov.com>, "Adams, Sam - NRCS, Fort Collins, CO" <sam.adams@co.usda.gov>, Donnie Dustin <DDUSTIN@fcgov.com>, "kenan.diker@state.co.us" <kenan.diker@state.co.us>
Cc: "Owsley, William - NRCS, Greeley, CO" <william.owsley@usda.gov>, Gregory Peterson <petersongap@comcast.net>, DOUGLAS J Ochsner <dougochsner@msn.com>, John Kefalas <kefalajm@co.larimer.co.us>

Good morning, Zach et al;

This is probably my number one priority for our program and would be extremely interested in helping move the ball forward. Let's get together in the near future.

Warmly,

Greg

DUCKS UNLIMITED | RESCUE OUR WETLANDS Banding Together for Waterfowl

Greg Kernohan, Director

Conservation Programs

Ecosystem Services

1825 Sharp Point Dr. Suite 118

Fort Collins, CO 80525

970-481-7793 (c)

gkernohan@ducks.org

Gmail Zach Thode <zthode@lehiwater.com>

Nutrient Trading Pilot

Adam Jokerst <Adam.Jokerst@greeleygov.com> Wed, Jul 7, 2021 at 5:06 PM
To: Zach Thode <zthode@lehiwater.com>, Roy Otto <Roy.Otto@greeleygov.com>, "jarndt@fcgov.com" <jarndt@fcgov.com>, "Adams, Sam - NRCS, Fort Collins, CO" <sam.adams@co.usda.gov>, Donnie Dustin <DDUSTIN@fcgov.com>, "kenan.diker@state.co.us" <kenan.diker@state.co.us>
Cc: "Owsley, William - NRCS, Greeley, CO" <william.owsley@usda.gov>, Gregory Peterson <petersongap@comcast.net>, DOUGLAS J Ochsner <dougochsner@msn.com>, Greg Kernohan <gkernohan@ducks.org>, John Kefalas <kefalajm@co.larimer.co.us>

Zach,

The City of Greeley supports a nutrient trading program on the Poudre River that directs funding to local ag producers. We are currently planning over $70 million to upgrade our wastewater treatment plan to meet new, higher regulatory limits, including on nutrients. We would much rather see that money going to crops than concrete.

Colorado has a nutrient trading policy in place through the Water Quality Control Division, available here: https://www.colorado.gov/pacific/sites/default/files/WQ_Pollutant-Trading-Policy.pdf. Greeley is presently investigating the feasibility of a water temperature trading credit system on the Poudre, and we are working with an organization familiar with these trades, Freshwater Trust. I can see what they know about nutrient trading models.

City of Greeley Colorado

Adam Jokerst, PE

Deputy Director, Water Resources

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From: Zach Thode <zthode@lehiwater.com>
Sent: Wednesday, July 07, 2021 7:00 AM
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