



September 3, 2025

James Wheatley  
[james.wheatley@state.co.us](mailto:james.wheatley@state.co.us)  
Project Manager  
Grants and Loans Unit  
Water Quality Control Division  
Colorado Department of Public Health and Environment

Re: City of Greeley Drinking Water Revolving Fund (DWRF)  
Project Scope Change Request  
DWRF Project No. 240011D-Q, Weld County  
PWSID #CO0162321

Dear James Wheatley:

The City of Greeley, Water and Sewer Department ("City") closed on a Drinking Water Revolving Fund (DWRF) loan on December 18, 2024 to support their Lead Service Line Replacement (LSLR) project. Since the LSLR project was initiated, the City now anticipates a lower total project cost associated with LSLR Phase 1-4 and would like to request reallocation of a portion of loan funds to be used for the City's Water Reservoir Rehabilitation project and Phase 5 LSLR. This letter provides a summary of the Water Reservoir Rehabilitation and Phase 05 of the LSLR project.

**1. Project Description for Selected Amended Projects for the 23<sup>rd</sup> Avenue Water Reservoirs Rehabilitation.**

The City of Greeley's treated water reservoirs at 23rd Ave had a total 37.5 MG capacity serving east Greeley in early 2022. Three tanks were constructed in 1927 and had floating covers completed in 2008, the fourth tank was constructed in 1973. A CDPHE inspection identified deficiencies in three of the four tanks' floating lid covers that required attention. Based on the finding from CDPHE, the city removed the three tanks from service, losing 22.5 MG of storage. Water tank replacement efforts will address replacement storage and piping to integrate with the existing storage reservoir and distribution system.

Subsequent to the Alternatives Analysis prepared by Merrick in June 2023, an optimization study conducted in 2023 and 2024 identified some options for supplemental storage for Zone 1 by utilizing existing storage at the Mosier Hill reservoir site. That site has a 15MG tank that can be reconfigured for supplying Zone 1 to supplement Tank 4. This optimization can delay the need for a new tank at 23<sup>rd</sup> Ave site by 10-15 years. However, the existing piping needs to be reconfigured and upgraded to accommodate the additional reservoir storage that will eventually be built at the site.

The additional amended project at the 23<sup>rd</sup> Avenue reservoirs site will be to replace and upgrade the piping network for efficiency to maintain current operations and in preparation for connection to the additional storage reservoir(s) that will be needed in the future. The proposed project, also known as

the 23rd Ave Reservoir Improvements Project, consists of the decommissioning and removal of the Reservoir 2 chlorine buildings and 20-inch to 36-inch water line, valves, panels, and meters from the 23<sup>rd</sup> Avenue reservoirs site. Concluding with the construction of 24-inch to 36-inch water line, valves, electrical components, meters and additional components interconnecting mains to the existing City water system.

2. Project Description for Addition of Phase 05 LSLR

An additional amended project request is the City of Greeley's continuation of the LSLR program and the addition of the Phase 05 (Phase05HP) project, consisting of the potholing and inspection of properties (sites) identified as being “High Priority” for lead. A property is deemed “High Priority”, when pipes having either an “oldest date” designations, pre-1940 installation date, or there is another risk factor identified by the City such as a historical tap card lead mention, or conflicting build date information. The estimated quantity of sites in Phase05HP is approximately 500. Phase 05 also consists of plans to conduct the Minimum Service Line Material Verification (MSLMV) at approximately 350 various locations across the City’s service area, which sites selected in accordance with CDPHE’s Safe Drinking Water Program Implementation Policy DW018 Section 2.2. These sites will be designated as Phase05-MSLMV and will be randomly selected during the MSLMV process.

With this letter, the City is requesting that existing DWRf funds are reallocated to implement continued replacement of lead service lines in the Phase 05 area, and to implement the finished water reservoir rehabilitation. **Table 1** below provides a summary of Phase 05 and the 23<sup>rd</sup> Avenue Reservoir Improvement projects, including the total estimated cost for each project and **Table 2** displays the project schedule for the selected amended projects.

Table 1. Phase 05 and 23<sup>rd</sup> Avenue Water Reservoirs Project Amended Projects

Amended Project	Description	Cost
Phase 05 LSLR	<ul style="list-style-type: none"><li>• Potholing and inspection of lead lines at 500 High Priority property locations</li><li>• Potholing and inspection of lead lines at 350 MSLMV locations.</li></ul>	\$2,439,787
23 <sup>rd</sup> Ave Reservoir Improvements	Demolish Reservoirs 2 chlorine buildings and 20"-36" water mains, and construct 24" – 36" water mains and components to Zone 1 distribution on the effluent side of the 23 <sup>rd</sup> Ave reservoir site	\$3,694,000
Total		\$6,133,787

Table 1. Proposed Project Schedule

Amended Project	Description	Cost
Phase 05 LSLR	State Historic Preservation Section 106 Consultations	Fall/Winter 2025
	Phase 05 LSLR Design Plans (60-day review period)	N/A
	Advertisement for bids	January 2026
	Award Contracts	February 2026
	Start Construction	March 2026

Amended Project	Description	Cost
	Complete Construction	June 2026
23 <sup>rd</sup> Ave Reservoir Improvements	State Historic Preservation Section 106 Consultations	Fall/Winter 2025
	23 <sup>rd</sup> Avenue Reservoir Design Plans (60-day review period)	Fall/Winter 2025
	Advertisement for bids	Winter 2025/2026
	Award Contracts	Winter 2025/2026
	Start Construction	Winter 2025/2026
	Complete Construction	2026

(1) The schedule originally submitted with the PNA had the incorrect year, stating 2023 instead of 2024. All project activities are expected to be completed in 2024.

The City has developed processes to address and meet the required federal EPA standards and state compliance requirements for these proposed projects. Below are proposed supplemental studies and compliance practices the City plans to partake:

#### Supplemental Studies and Compliance to Date

- SHPO Section 106 Consultation – The City will initiate, prepare, and submit packages that assess the effects of the projects on historic properties in accordance with the National Historic Preservation Act.
- BABA compliance – The City plans to create all needed reviews, certifications, and reporting requirements to comply that both projects will require that all iron and steel, construction materials, and manufactured products used in proposed infrastructure projects are produced in the United States.
- Environmental compliance – The selected amended projects are located on existing facilities and are the rehabilitation of existing infrastructure. The City has received a categorical exclusion determination for previous phases of the LSLR and 23<sup>rd</sup> Ave projects. The City assumes the same categorical exclusion determinations for the selected amended projects. The project sites remain unchanged and were included in previous PNA and associated Environmental Checklist.
- Public Meeting: A public meeting will be held to discuss the selected amended project, for the Phase 05 LSLR and the 23<sup>rd</sup> Avenue water reservoir improvements project. The City will post on their website and issue a notification about the public meeting at least 30 days prior to the meeting and allow 30 days for public comment on the DWRF loan amendments. The City will conduct an analysis of the environmental impacts of both new components and share the results at the public meeting.

Sincerely,

DocuSigned by:

  
1386F99B42684DD...

Virgil U. Pierce  
Utility Finance Manager  
Greeley Water and Sewer  
Phone: 970.336.4172  
[Virgil.Pierce@Greeleygov.com](mailto:Virgil.Pierce@Greeleygov.com)

Attachments:

1. 23<sup>rd</sup> Ave Site Control and Overall Plan
2. 23<sup>rd</sup> Ave Preliminary Cost Estimate
3. 23<sup>rd</sup> Ave and Mosier Reservoir Improvements – 30% Design Document
4. 23<sup>rd</sup> Ave Vicinity Map
5. City of Greeley DW PNA Environmental Checklist
6. City of Greeley DW PNA Map
7. LSLR Budget – June 2025