

The Klein Water Treatment Facility (WTF) is currently zoned as Public, and the land immediately west of Klein WTF, is being purchased to develop and construct the proposed new ion exchange (IX) treatment facility. This new property is currently zoned Planned Unit Development District, and The South Adams County Water and Sanitation District (SACWSD) is requesting it be changed to match the Klein WTF and be zoned Public. SACWSD conducted an alternatives evaluation in August of 2019 that included a desk top evaluation of IX and full-scale characterization of granular activated carbon (GAC) treatment for the removal of perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). Subsequently, continued GAC optimization was performed along with a pilot scale IX operation from January 2019 through May 2020 to treat a combined PFAS/PFOA of 160 parts per trillion (ppt) down to goals of 35 ppt and non-detect.

From the pilot results, and the subsequent benefit-cost analysis conducted, IX was selected as the best overall long-term option for the removal of perfluorinated compounds. Additionally, the removal of 1,4 Dioxane was also evaluated. UVAOP (using peroxide and chlorine) were evaluated and implementation with peroxide was identified as the optimal solution, though this facility will be designed and constructed at a later time.

SACWSD currently utilizes a GAC treatment process at their Klein WTF. To consistently meet current satisfactory levels, SACWSD blends finished water with a limited amount of contracted supply. While this method of operations has resulted in current monitored PFAS levels that are satisfactory to SACWSD, the operations are costly and inefficient. Additionally, this method is an interim option as SACWSD grows into the full use of their long-term supplies. Because of this, the design and construction of IX treatment system is the most efficient, cost effective, and sustainable way for SACWSD to treat for PFAS in their source water. Below are the requested considerations by Commerce City (City) for the proposed zone change.

- i. **The proposed zone district and allowed uses are consistent with the policies and goals of the comprehensive plan, any applicable adopted area plan, or community plan of the city.** *The District believes the proposed zone district is consistent with the policies and goals of the comprehensive plan. The Comprehensive Plan outlines five goals, developed by City Council, for growth and development of Commerce City, which include: (1) Promote a balanced and thriving economy; (2) Promote efficient and effective city government to improve levels of service; (3) Develop and maintain the public infrastructure to improve community appearance and encourage continued development; (4) Promote resident health, safety, and education; and (5) Improve community involvement and trust. This proposed zone change aligns with all of the goals in the following ways:*
 1. *This project is supporting the City's goal of promoting a balanced and thriving economy by completing this project and enforcing confidence in SACWSD's ability to enhancing and maintaining water quality.*
 2. *Levels of service are improved by ensuring water treatment capabilities for the recipients of SACWSD water through the improvements proposed in this project.*
 3. *The successful completion of this project, after a successful zone change, will improve drinking water infrastructure and by doing so encourage development and improve community appearance.*
 4. *The proposed project will treat PFAS in SACWSD's source water, therefore promoting resident health and safety. Additionally, SACWSD has held public meetings, including regular board meetings, about the project and its importance to resident health.*

5. *Through transparency with the community, and ensuring its ability to treat PFAS in the source water, SACWSD is improving community involvement and trust through the successful completion of this project.*

- ii. **The proposed zone district and allowed uses are compatible with proposed development, surrounding land uses and the natural environment.** *The existing Klein WTF is directly east of the proposed zone district, so an expansion of that facility on the proposed zone district is compatible with surrounding land use. Additionally, SACWSD is only proposing a zone change on the parcel of land needed for the project, and therefore not impacting any of the other surrounding land or natural environment.*

- iii. **The proposed zone district will have, or future development can provide, efficient and adequate provision of public services, including but not limited to, water, sewerage, streets, and drainage.** *SACWSD is the public utility responsible for water and sewer services and will provide adequate services to the proposed new facility. Additionally, streets will not need to be upsized or modified as there will not be a significant increase in traffic and drainage is being managed through on-site engineering.*

- iv. **The proposed zone district will have, or future development can provide, efficient and adequate provision of public uses including but not limited to, parks, schools, and open space.** *The proposed zone district is limited to the parcel of land necessary to successfully complete the project and therefore not impacting provision of public uses to parks, schools, or open space.*

- v. **There is a community need for the zoning district in the proposed location, given need to provide or maintain a proper mix of uses both within the city and the immediate area of the proposed use.** *This zone change will facilitate a much-needed facility expansion to treat for PFAS, which does satisfy a community need.*

- vi. **The area for which zone change is requested has changed or is changing to such a degree that it is in the public interest to allow a new use or density.** *Correct, the current zone is a Planned Unit Development zone which would not allow for the new use of a drinking water facility.*