

**BEFORE THE COLORADO WATER QUALITY CONTROL COMMISSION
Department of Public Health and Environment, State of Colorado**

**RESPONSIVE PREHEARING STATEMENT OF THE BEAR CREEK WATERSHED
ASSOCIATION**

**IN THE MATTER OF THE RULEMAKING HEARING FOR CONSIDERATION OF THE
ADOPTION OF REVISIONS TO THE BASIC STANDARDS AND METHODOLOGIES FOR
SURFACE WATER, REGULATION #31 (5 CCR 1002-31) AND THE ADOPTION OF A NEW
NUTRIENTS MANAGEMENT CONTROL REGULATION, REGULATION #85 (TO BE
CODIFIED AT 5 CCR 1002-85).**

The Bear Creek Watershed Association (hereinafter “Association”) presents its Responsive Prehearing Statement in the above referenced matter.

Factual Claims.

A. Association Authority

The Association is the water quality management agency for the Bear Creek Watershed. The Association is responsible for watershed management, restoration and implementation within the context of a management agency and the Bear Creek Control Regulation (Control Regulation 74, 5 CCR 1002-74).

B. Association Summary Positions

Correlation with Bear Creek Control Regulation #74. Bear Creek Control Regulation #74 (5 CCR 1002-74) controls point source total phosphorus within the watershed, defines the necessary monitoring program to determine compliance with Regulation #74, and establishes a strategy to address nonpoint sources within the watershed. The Association has a 30-year history of addressing nutrient management within the watershed and has an extensive water quality data-base to support the nutrient management strategies being implemented by the Association and its membership. The Association clearly understands the importance of nutrient management and the complexities of this management task at a watershed level. The Association uses an adaptive management program based on Regulation #74 to maintain specific watershed and Bear Creek Reservoir-specific goals. The Association wastewater and nutrient management and implementation programs are implemented at both a site-specific (e.g., wastewater treatment plant or stream tributary) and a watershed level.¹

As such, the Association asserts that the proposed changes to Regulation #31 and the proposed new nutrient management control Regulation #85 could affect the Bear Creek Control Regulation #74 and potentially alter watershed management strategies already being implemented by the Association. The Bear Creek Control Regulation #74 is already a nutrient management control regulation for total phosphorus, which was determined as the parameter of concern within the watershed. Therefore, the Association is concerned how this new proposed control regulation #85 will coordinate with or modify the existing Bear Creek Control Regulation #74. The Association believes there are several specific parts

¹ Bear Creek Watershed Association, “2010 Annual Report for the Colorado Water Quality Control Commission,” available on line at, <http://www.cdphe.state.co.us/op/wqcc/Reports/WatershedAR/BearCreekAR2010.pdf>,

of regulation #85 that are in conflict or potential conflict with Regulation #74: 1) future need for and timing of conversion to Biological Nutrient Reduction facilities; 2) watershed versus site-specific monitoring plan; 3) trading provisions and existing trades; 4) determination of disadvantaged communities within the watershed; 5) discharge permit total phosphorus limits; and 6) Regulation #85 versus Regulation #74 implementation of best management practices. As such, the Association is unclear which control regulation will be controlling now and into the future. Therefore, the Association seeks clarification on which control regulation should be used to manage the watershed.

The Association strongly supports keeping Regulation #74 as the nutrient management control regulation for the watershed with watershed-specific total phosphorus standards and interim nitrogen standards. The Association believes it would also be in the best interest of the Commission to use the existing Watershed Protection Control Regulations 71-74 as the primary “nutrient management control regulations”. Since a control regulation cannot be incorporated by reference, it will require the existing control regulations be modified to be consistent with Regulation #85, as appropriate. The Association contends that the existing control regulations should be the primary nutrient management control regulations and not be subject to Regulation #85 modifications after a 10-year delay.

Since the existing control regulations already set limits for total phosphorus, it would be more efficient to simply incorporate the Total Inorganic Nitrogen (TIN) limits into these controls regulation by May 31, 2022. This would allow the existing control regulations to be the primary control regulations while still meeting the intent of the new Regulation #85. Further, the Division can work with the existing management agencies for regulations 71-74 to make sure these control regulations address the expectations for nonpoint source and stormwater management, and that the existing monitoring program are sufficient to meet the intent of Regulation #85. There should not be competing control regulations that generate uncertainty on which control regulation is controlling.

The Association membership has spent over 19.7 million for wastewater treatment facility upgrades and ongoing operations to meet the 1 mg/l total phosphorus limits in Regulation #74 (Table 1). The cost to meet the proposed nitrogen limits will be similar or higher than required for the total phosphorus management. Additionally, the dischargers anticipate a reduction in the total phosphorus limits, which will increase these cost estimates. The major dischargers are evaluating the processes and costs for nitrogen controls. The Association believes a 10-year delay in the implementation of any nitrogen controls is critical to ongoing operations. The dischargers are not convinced that a conversion to BNRs will be necessary to meet the proposed TIN limits. The Association intends to focus on total phosphorus reductions over the next decade. Capital and operational costs at discharge plants could increase by 2-3 million by 2022. The watershed membership will be fiscally constrained in implementing nitrogen controls.

Bear Creek Watershed Wastewater Treatment Plant	Capital Cost (\$) For Nutrient Conversion (1994 Dollars)	New Nutrient Upgrades Completed/in Progress (\$) 2009-2013	Annual Operating Cost Needed for Total Phosphorus	Notes
Evergreen Metropolitan District	\$435,000	\$2,600,000	\$44,000	
West Jefferson County Metro District	\$1,202,000	\$0	\$47,000	
Genesee Water and Sanitation District	\$330,000	\$0	\$20,000	
Town of Morrison	\$250,000	\$3,500,000	\$13,050	+\$3,000
Kittredge Sanitation and Water District	\$700,000	\$0	\$11,000	

Bear Creek Watershed Wastewater Treatment Plant	Capital Cost (\$) For Nutrient Conversion (1994 Dollars)	New Nutrient Upgrades Completed/in Progress (\$) 2009-2013	Annual Operating Cost Needed for Total Phosphorus	Notes
Forest Hills Metropolitan District	\$5,000	\$599,000	\$3,000	
Conifer Metropolitan District	\$1,700,000	\$0	\$5,000	
Aspen Park Metropolitan District	\$2,300,000	\$600,000	\$5,000	
Jefferson County Schools – Mt. Evans Outdoor School	\$5,000	\$750,000	\$10,300	
Jefferson County Schools - Conifer High School	\$1,300,000	\$0	\$18,000	
Bear Creek Development Corp. - Tiny Town	\$3,000	\$0	\$3,000	
Bear Creek Cabins (Bruce & Jayne Hungate)	\$4,500	\$0	\$4,400	
Brook Forest Inn	\$2,500	\$150,000	\$2,400	12,000 New Clarifier
Geneva Glen	\$24,000	\$40,000	\$500	Lagoon, dry lysimeters
The Fort	\$0	\$50,000	\$0	Large Septic, No Monitoring
Singing River Ranch	\$2,500	\$0	\$0	Not Operational
annual			\$186,650	
Total	\$8,263,500	\$8,289,000	\$3,173,050	\$19,728,550

Section 85.5 (1) (a) (ii) suggests that existing facilities subject Watershed Protection Control Regulations will be required to meet the parameter limitations in sections (iii) (a) and (b), which may not be the case, since the total phosphorus limits in regulations 71-74 maybe or are more stringent than those listed in this regulation. The Association does not believe it is the intent to allow a lessening of the permit limits for total phosphorus after May 31, 2022. Additionally, any new treatment works in the watersheds with existing control regulations should be subject to those control regulations 71-74 and not be forced to comply with a different regulation in the future.

The Association provides two options for changing Section 85.5(1) (a) (ii). Option 1 would require changing control regulations 71-74 to include nitrogen limits after May 31, 2022, which would make regulations 71-74 the primary nutrient management regulations. Option 2 would require total phosphorus to be defined in control regulations 71-74 and the nitrogen numeric limits linked to Regulation #85. The Association preference is for option 1.

Option 1

Section 85.5(1) (a) (ii). Existing and future permitted DWWTW subject to Watershed Protection Control Regulations 71-74 (5 CCR 1002-71, 5 CCR 1002-72, 5 CCR 1002-73, and 5 CCR 1002-74) are not subject to the numeric limits in subsection (iii)(a) below and Total Phosphorus effluent limitations in CDPS permits will be defined from the appropriate Watershed Protection Control Regulations 71-74. Prior to May 31, 2022 the Watershed Protection Control Regulations 71-74 will incorporate numeric limits consistent with subsection (iii) (b) below. Prior to May 31, 2022 preliminary effluent limitations for Site Location and Design Approvals for DWWTWs

subject to Watershed Protection Control Regulations 71-74 will not include numeric limits for nitrogen.

Option 2

Section 85.5(1) (a) (ii). For new or existing permitted DWWTW subject to Watershed Protection Control Regulations 71-74 (5 CCR 1002-71, 5 CCR 1002-72, 5 CCR 1002-73, and 5 CCR 1002-74), Total Phosphorus effluent limitations in CDPS permits will be defined from the appropriate Watershed Protection Control Regulations 71-74. The numeric limits in subsection (iii) (b) below will not be included in preliminary effluent limitations for Site Location and Design Approvals prior to May 31, 2022. After May 31, 2022, existing and new DWWTW facilities will be required to meet, at minimum, numeric limits in subsection (iii) (b) below.

Assuming option 1, the Association recommends modifying the language in the statement of basis and purpose under the section on “V. Facilities Subject to Other Nutrient Control Regulations” as follows:

The Commission recognized that the TP effluent limits for existing and new DWWTW and industrial dischargers in the Dillon, Cherry Creek, Chatfield and Bear Creek reservoir basins is defined by the existing Watershed Protection Control Regulations 71-74. The Commission provided a ten year delay in the implementation of the nutrient effluent limits for TIN for new or existing DWWTW and industrial dischargers in the Dillon, Cherry Creek, Chatfield and Bear Creek Reservoir basins. These entities are required to meet effluent limits for total phosphorus that are at least as stringent as those required under this regulation and have invested tens of millions of dollars in treatment facilities, the vast majority of which do not use BNR. The Commission found that requiring these entities to meet the new TIN effluent limits would necessitate installation of BNR for removal of TIN at significant additional cost. The Commission provided an exemption in order to provide time for these entities to plan for any additional measures, if necessary, to meet BNR-based requirements for nitrogen. These entities will continue to meet the effluent limits for total phosphorus as defined in the existing Watershed Protection Control Regulations 71-74. The Commission directed the Division staff to work with these entities to recommend changes to the existing Watershed Protection Control Regulations 71-74 to address nitrogen limitations.

Association Position on Nitrogen and Phosphorus Management. The Association recognizes the value of a comprehensive watershed-level water quality management program that remains collaborative, flexible and effective. The extensive water quality monitoring program of the Association has evaluated nutrient trends throughout the watershed with a focus on Bear Creek Reservoir. While the monitoring program has considerable more phosphorus species data, it has also monitored nitrogen species with an emphasis on nitrate-nitrogen. The total phosphorus load from the watershed comes from a combination of wastewater treatment plant point source loads and nonpoint sources, including stormwater runoff. There are over 27,000 septic systems in the watershed.

The estimated total phosphorus load in 2010 from all sources reaching the reservoir was 3,654 pounds at a flow of about 29,627 acre-feet. Bear Creek drainage contributed 72% of the load. The nitrate loading (47,868 pounds) was typical of past flow conditions with 77% of the load coming from Bear Creek. Although the point source discharges of total phosphorus were about 1121.41 pounds, the water diversions above the reservoir are removing about 25% of this phosphorus load and inflow water before it reaches the reservoir. Nutrient management practices in the watershed have helped reduce the total phosphorus loading in the watershed (Figure 1). The management practices have been less effective on Bear Creek at reducing the nitrate-nitrogen loading from the watershed (Figure 2). Periodic high nitrogen concentrations (above the proposed interim nitrogen standard) are measured in both Turkey Creek and Bear Creek, especially in low flow periods.

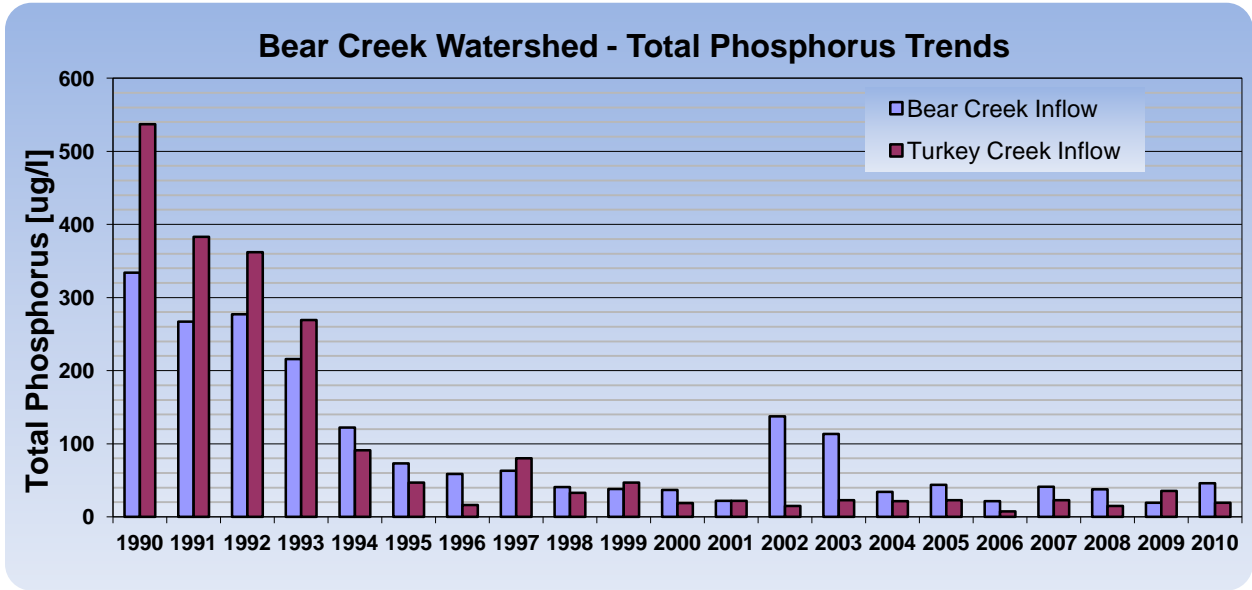


Figure 1 Total Annual Total Phosphorus inflow into Bear Creek Reservoir

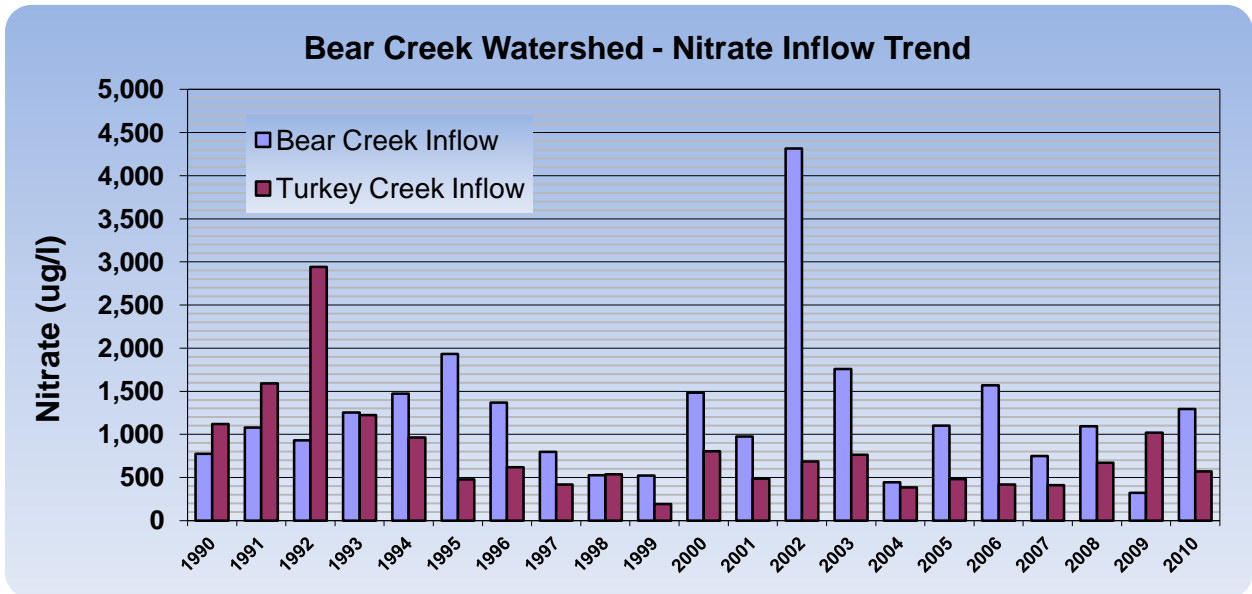


Figure 2 Total Annual Nitrate-Nitrogen inflow into Bear Creek Reservoir

The Association began tracking Total Phosphorus and Total Nitrogen pairs at selected points in the watershed over the last three years. The monitoring program begins at Summit Lake in the Mount Evans Wilderness (see Figure 3) and extends through Bear Creek Reservoir. The Association has noted in several annual reports presented to the Water Quality Control Commission that nitrate-nitrogen was a parameter of concern. As such, the Association has collected more nitrogen species data in the last five-years.

Consequently, the Association supports the concept of phosphorus and nitrogen nutrient management for the Bear Creek Watershed. The Association generally supports the proposed revisions to regulation #31 with specific comments and concerns as noted in this responsive prehearing statement.

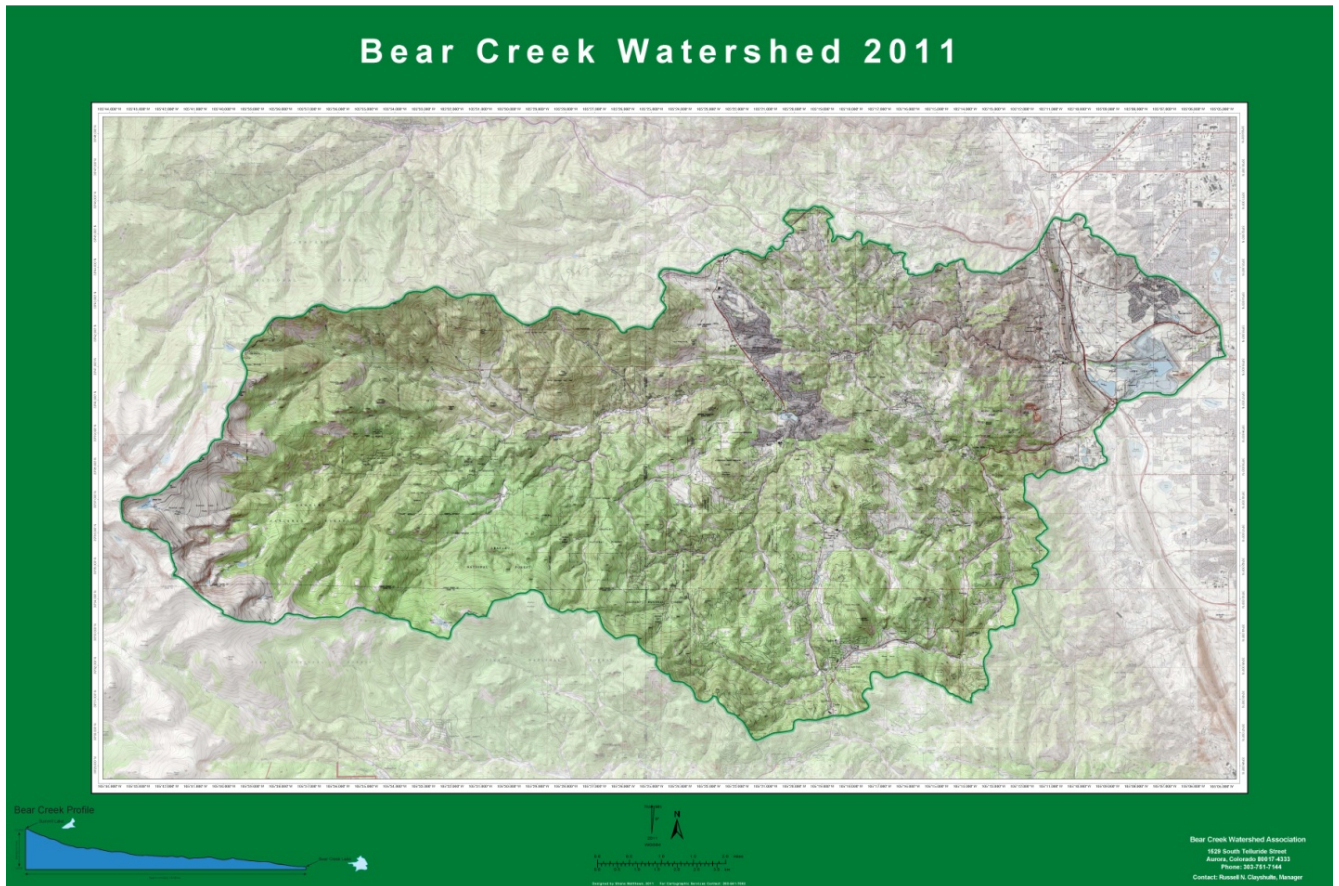


Figure 3 Bear Creek Watershed

Recognize Bear Creek Watershed as the Appropriate Management Area. The Bear Creek Watershed is defined in Regulation #74 as:

“...includes Bear Creek and all tributaries, Turkey Creek and all tributaries, and Bear Creek Reservoir in Jefferson County. The Bear Creek Watershed extends into Clear Creek and Park Counties, Colorado. The watershed area is delineated in Figure 1 attached to this regulation.”

Since the watershed map produced by the Denver Regional Council of Governments is no longer available or updated, the Association in 2011 produced the new watershed map consistent with the Regulation #74 map as shown in Figure 3. This revised map will be incorporated into Regulation #74 at the next regulatory update opportunity.

The defined watershed boundary for Bear Creek is not an 8-digit HUC basin. The Association notes that the 8-digit HUC hydrologic unit is referenced in Regulation #85 and is the states preferred watershed unit. The Association believes it is essential that the established Bear Creek Watershed be recognized as an appropriate nutrient management region. The Association recommends adding language into the Statement of Basis and Purpose as follows:

The Commission has adopted the Bear Creek Watershed hydrologic basin as shown in Bear Creek Control Regulation #74 (5 CCR 1002-74) as an appropriate nutrient management region for the Bear Creek and Turkey Creek drainages above Bear Creek Reservoir in Park, Clear

Creek and Jefferson Counties. Nutrient management revisions in Regulation #31 and the new Regulation #85 not otherwise addressed in Regulation #74 will be applied to the Bear Creek Watershed nutrient management region.

Association Position on the Colorado Nutrient Coalition. The Association supports the Colorado Nutrient Coalition and is a contributing member of the CNC. The Association chooses involvement because the membership sees an opportunity to obtain additional collective scientific information and other perspectives on a very complex set of issues and regulatory components. The collective analytic effort of the CNC advisors is well beyond what the fiscally constrained Association could produce on its own. As such, the Association concerns presented in this prehearing statement are watershed specific and independent of the concerns raised by the CNC. Generally, the Association supports the scientific basis of CNC prehearing statement and supporting documents.

Association Position on Direct Use Water Supply Lakes and Reservoirs. There are two potential direct use water supply reservoirs in the Bear Creek Watershed. The maintenance of good water quality in these reservoirs is a high priority of the Association. The Association supports the “Direct Use Water Supply Lakes and Reservoirs Sub-classification”. The Association supports having a protective Chlorophyll *a* value for these reservoirs. The Association has begun efforts to improve and monitor the water quality in the two potential direct use water supply reservoirs. The use of a chlorophyll *a* standard could be a useful water quality management option and could be part of nutrient management program.

The Association does believe it will be critical to collect multi-year (probably 5-years) site-specific water quality data set to establish an ambient quality basis for these direct use water supplies before the Commission applies a site-appropriate protective value for chlorophyll *a*, which may or may not be 5 ug/l. Once a site-appropriate chlorophyll *a* standard is identified, the Association would recommend its incorporation into the Bear Creek Control Regulation #74. The control regulation would also define the process(es) necessary to maintain or achieve the standard once adopted by the Commission in the direct use reservoirs.

The Association recommends adding language to the statement of basis and purpose of regulation #31 as follows:

The Commission has the discretion to adopt site-appropriate chlorophyll *a* standards for direct use water supply lakes or reservoirs, based on appropriate water quality data or any other site-specific considerations, and incorporate this standard into existing or new Watershed Protection Control Regulations. The appropriate control regulation would define the process(es) necessary to achieve or maintain the adopted standard.

Association Position on Regulation #85 Trading Provisions. The Association has trading provisions already included in Regulation #74 and has adopted nutrient trading guidelines, which have been used to conduct trades in the watershed (Exhibit 1). Trading is a valuable tool to manage nutrients in the watershed. A great deal of effort has been expended to develop and implement the trading provisions. The Association would note that water quality data demonstrates that a trade will never achieve equal or better instream quality “at all locations and at all times” within the watershed. There are simply too many variables that can alter water quality. To place this type of limitation would effectively render trading as impossible. A well designed trade can achieve very good results for a majority of the time, which is a benefit to the watershed quality. Trading must have the flexibility to part of an adaptive management process. The Associations recommends changing Sections (d) (i) and (ii) as shown below. The Association also contends it is essential to maintain the existing trading provision contained in Watershed Protection Control Regulations 71-74 and would recommend adding a new subsection (d) (iii) as noted below.

(d) Nutrient Trading

(i) Point Source to Point Source Nutrient Trading. The numerical effluent limitations set forth in sections 85.5(1)(a)(iii), 85.5(1)(b) and 85.5(2) may be modified for individual discharge permits pursuant to a trade of nitrogen or phosphorus between point sources where the Division has determined that the trade ~~will~~ should result in equal or better instream water quality for that parameter ~~at all locations and at all times~~.

(ii) Nonpoint Source to Point Source Nutrient Trading. The numerical effluent limitations set forth in sections 85.5(1)(a)(iii), 85.5(1)(b) and 85.5(2) may be modified for individual discharge permits pursuant to a trade of nitrogen or phosphorus credits from a nonpoint source to a point source on a stream segment or watershed basis where the Division has determined that the trade achieves a net water quality or environmental benefit and results in equal or better instream water quality.

(iii) Section (d)(i) and (ii) does not alter, replace or supersede nutrient trading provisions adopted in Watershed Protection Control Regulations 71-74 and included in trading guidelines for those watersheds covered by Regulations 71-74. This section does not limit the Commission's options to adopt or modify nutrient trading programs in Regulations 71-74.

The Association recommends adding language to the statement of basis and purpose, under the section IX on trading as follows:

Effect on Trading Programs Under Other Control Regulations. The Commission adopted nutrient trading provisions in the Watershed Protection Control Regulations 71-74. The Commission does not intend to alter, replace, or supersede the existing nutrient trading provisions and programs established in Regulations 71-74. The Commission does not intend to limit its options to adopt or modify nutrient trading programs in Regulations 71-74.

Association Recommended Additions to WQCD Exhibit 7. The Association recommends adding the following four wastewater treatment facilities that qualify for exclusion in the WQCD Exhibit 7 – “Preliminary List of Facilities that are Excluded”:

1. The Fort Resturant
2. Conifer Sanitation Association
3. Aspen Park Metropolitan District
4. West Jefferson County Metropolitan District

Association Recommended Changes to Regulation #85 Monitoring Requirements. The Association maintains a comprehensive and collaborative water quality monitoring program for Bear Creek Watershed. The Association monitors effluent from all wastewater dischargers and coordinates the sampling between the dischargers and stream/ watershed sampling. This monitoring program allows the Association to monitor quality trends throughout the watershed. The Association monitoring program with a few adjustments can easily meet the monitoring requirements in Section 85.6. However, it is not clear in this section if a collaborative watershed based monitoring program will be allowed to meet all of the monitoring requirements for wastewater effluent, streams, lake and reservoirs, nonpoint and stormwater.

The Association recognizes that a nutrient management program requires a good monitoring program. The Association has used an adaptive monitoring approach that allows the monitoring program to adjust on an annual basis to needs, watershed issues and water quality trends. The Association supports the alternative identified in the statement of basis and purpose to make efficient use of existing collaborative water quality monitoring programs.

Since the monitoring effort will commence by March 1, 2013, the Division will need to review and accept watershed monitoring programs from existing programs for consistency with section 85.6 by January 1, 2013. Since existing monitoring programs like the Bear Creek monitoring program are based on a calendar year, the acceptance of the monitoring program to meet requirements in 85.6 must be done on a timely basis. The Association recommends adding language to the state of basis and purpose in section XII:

Watershed Protection Control Regulations monitoring programs: The Commission expects the Division to evaluate existing monitoring plans established by Watershed Protection Control Regulations 71-74 by January 1, 2013 to determine if these monitoring program and data can meet or can be adjusted to meet the monitoring requirements specified in section 85.6. The Division will issue a letter of acceptance for appropriate watershed monitoring plans that meet the minimum requirements of section 85.6 by March 1, 2013.

C. Exhibits and Written Testimony.

The Association reserves the right to submit additional materials as part of the rebuttal process, as necessary.

- Exhibit 1 Bear Watershed Association Trading Program, Attached

D. Witnesses.

The following manager and members of the Association may provide testimony on the appropriateness of proposed changes and rebuttal testimony as needed.

Russell Clayshulte Bear Creek Watershed Manager 1529 S. Telluride St. Aurora, Colorado 80017-4333	Dave Lighthart Bear Creek Watershed Association Board 30920 Stagecoach Boulevard Evergreen, Colorado 80437
Gerald Schulte Bear Creek Watershed Association Board 30920 Stagecoach Boulevard Evergreen, Colorado 80437	Alan D. Searcy Bear Creek Watershed Association Board City of Lakewood, Public Works Department 480 S. Allison Parkway, Civic Center North Lakewood, CO 80226
Pat O’Connell Bear Creek Watershed Association Board 100 Jefferson County Parkway, Suite 3550 Golden, CO 80419-3550	

CERTIFICATE OF SERVICE

I do hereby certify that a true and exact copy of the Bear Creek Watershed Association Responsive Prehearing Statement in the matter of the rulemaking hearing For Consideration of The Adoption of Revisions To The Basic Standards And Methodologies For Surface Water, Regulation #31 (5 CCR 1002-31) And The Adoption Of A New Nutrients Management Control Regulation, Regulation #85 (To Be Codified At 5 CCR 1002-85).was e-mailed to the following on the 20th day of January 2012:

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