

MOFFAT COUNTY BOARD OF COUNTY COMMISSIONERS
1198 W. Victory Way Craig, Colorado 81625
(970) 824-5517

Tony Bohrer
District 1

Melody Villard
District 2

Donald Broom
District 3

Board Meeting Agenda

Minutes will be recorded for these formal meetings

Tuesday, February 24, 2026

8:30 am Pledge of Allegiance

Call to order by the Chairman

Approval of the agenda

Consent Agenda -

Review & Sign the following documents:

Minutes:

- a) February 10 (pgs 3-7)

Resolutions:

- b) 2026-24: Voided Warrants Resolution (pg 8)
- c) 2026-25: Transfer of Intergovernment Funds (pg 9)
- d) 2026-26: A/P – December (pg 10)
- e) 2026-27: A/P – January (pg 11)
- f) 2026-28: P-Cards (pg 12)
- g) 2026-29: Payroll (pg 13)

Contracts & Reports:

- h) Annual Wildland Fire Operating Plan (pgs 14-37)
- i) Department of Public Health/CO Department of Public Health & Environment - Overdose Fatality Review grant contract (pgs 38-54)
- j) Ratify:
 - Letter of Support: NW CO Health/SafeCare CO Program (pg 55)
 - 2025 Annual Stormwater Reports (pgs 56-82)

Please note that the Board may discuss any topic relevant to County business, whether or not the topic has been specifically noted on this agenda

Public Comment/General Discussion:

Staff Reports:



Presentation:

1:32 PM2/23/2026

Colorado River District – Zane Kessler & Andy Mueller

- Annual Program Update

1) Land Use Board – Will Myers & Jeff Comstock

- Draft EIS Comments regarding Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (pgs 83-86)

Adjournment

The next scheduled BOCC meeting will be Tuesday, March 10, 2026 - 8:30 am

Moffat County's YouTube link to view meeting:

<https://youtube.com/live/g6K2ru5Ay-w>

OR

<https://www.youtube.com/@moffatcountygovernment7518>

**** Agenda is Subject to Change until 24 hours before scheduled Hearings****
The Board may alter the times of the meetings throughout the day, or cancel or reschedule noticed meetings



1:32 PM2/23/2026

Moffat County Board of County Commissioners
1198 W Victory Way Craig, CO 81625

February 10, 2026

In attendance: Melody Villard, Chair; Donald Broom, Vice-Chair; Tony Bohrer, Board Member; Erin Miller, Deputy Clerk & Recorder; Candace Miller; Neil Binder; Max Salazar; Chris Nichols; Tom Anthony; Bill Baker; Billy Berry

**Call to Order
Pledge of Allegiance**

Commissioner Villard called the meeting to order at 8:30 am

Villard made a motion to approve the agenda as presented. Broom seconded the motion. Motion carried 3-0.

Consent Agenda –

Review & Sign the following documents: (see attached)

Minutes:

- a) January 27

Resolutions:

- b) 2026-18: Transfer of Intergovernment Funds
- c) 2026-19: Voided Check Resolution
- d) 2026-20: A/P
- e) 2026-21: A/P
- f) 2026-22: Payroll

Contracts & Reports:

- g) Treasurer's report
- h) **Ratify:**
 - HUTF Mileage Certification
 - Department of Human Services /Yampa Valley Psychotherapists Mental Health Services contract

Villard made a motion to approve the consent agenda items A-H. Bohrer seconded the motion. Motion carried 3-0.

Please note that the Board may discuss any topic relevant to County business, whether or not the topic has been specifically noted on this agenda

Public Comment/General Discussion:

Bonnie Shirley, Motor Vehicle Supervisor in the County Clerk & Recorder's Office, gave a brief overview of the Motor Vehicle System Upgrade that will be happening in their office. The Colorado Division of Motor Vehicles (DMV) is launching a major digital upgrade. This statewide system improvement includes updates to the public e-services platform, myDMV, creating a simpler, faster, and more secure experience. Moffat County Motor Vehicle office hours and services will be impacted during the upgrade period. Shirley asks for the public's patience and understanding in the next few weeks as their staff completes required training on the

new system. As part of this process, the office will close at 2 pm on Friday, February 13 and re-open at 8 am on Tuesday, February 17.

Tom Anthony asked for clarification on what the County will do to replace the loss of 47% GDP with the closure of the power plant and coal mines? The BCC explained that there are several projects in the works to help offset that.

There was no general discussion.

Board of County Commissioners

Board Appointments: (see attached)

- Planning & Zoning Commission (2)

Two letters of interest were received for open seats on the Planning & Zoning Commission, from Kitsey Behrman and Samantha Harding.

Bohrer moved to appoint Kitsey Behrman to the voting seat on the Commission and Samantha Harding to the alternate seat. Broom seconded the motion. Motion carried 3-0.

- Hamilton Community Center Board

Colton Kreider submitted a letter of interest for an open seat on the Hamilton Community Center Board.

Broom moved to appoint Colton Kreider to the Hamilton Community Center Board. Bohrer seconded the motion. Motion carried 3-0.

Staff Reports:

Office of Development Services -Neil Binder

- Bid recommendations for the following Fairgrounds equipment: (see attached)

- Tractor (RFP #202602)

One bid was received for a new tractor for the Fairgrounds from US Tractor (Craig) in the amount of \$103,173.92. This includes a trade-in of \$8000 on an old tractor. This purchase was budgeted at \$110,000.

Broom made a motion to accept the bid recommendation for the Fairgrounds Tractor from US Tractor for \$103,173.92. Bohrer seconded the motion. Motion carried 3-0.

- Mower (RFP #202604)

Two bids were received for a new mower for the Fairgrounds:

- GovMark, LLC (Texas) \$61,491
- US Tractor (Craig) \$38,380

The purchase was budgeted at \$39,000.

Bohrer moved to award the bid for RFP #202604, Fairgrounds mower, to US Tractor for \$38,380. Broom seconded the motion. Motion carried 3-0.

➤ Water Tank Truck upfit (RFP #202603)

This will replace the water tank on a Fairgrounds truck that is in current use. One bid was received from Industrial Welding & Supply (Fort Collins) for \$49,250. The original budgeted amount for this purchase was \$38,000. Since other items came in under budget in the same line item, we are able to apply those surpluses to this acquisition.

Broom moved to approve the bid recommendation for the Water Tank Truck upfit from Industrial Welding & Supply for \$49,250. Bohrer seconded the motion. Motion carried 3-0.

- **Resolution 2026-23:** Resolution updating Moffat County Purchasing Policies (see attached)

This resolution is to amend the current Moffat County Purchasing Policies. It will increase the bid ceiling amount from \$25,000 to \$50,000. It will save the County money on bid bonds on simple projects that shouldn't require a bid.

Bohrer moved to approve **Resolution 2026-23:** Resolution updating Moffat County Purchasing Policies. Broom seconded the motion. Motion carried 3-0.

8:45 am

Public Hearing:

Planning & Zoning Department – Candace Miller

- S-20-01 - Amendment of Bennett Minor subdivision plat
- S-26-01 - Skull Creek Casitas Minor-Final
- S-26-02 - Kama Investments LLC Minor-Final

Villard read the Public Hearing protocol and declared the Public Hearing open.

Miller presented:

➤ S-20-01 - Amendment of Bennett Minor subdivision plat (see attached)

Application S-20-01 for Minor Subdivision was approved by the BOCC in October of 2020. Due to a financial situation, the applicant did not pick up the Mylar until August of 2023. Unfortunately, the applicant did not record the plat after taking possession and misplaced the original. The surveyor sent a replacement plat but due to the amount of time that has passed, the board should have a quick review to amend and sign with a current date. The lot was rezoned from AG to R2 in 2015. The minor created two parcels which fall under R2 zoning requirements. Nothing on the newly supplied plat changed from the original provided in 2020, all financials were resolved in 2023, releasing the deed.

Villard asked if anyone present wanted to testify either for or against this request; there was none. The Public Hearing was closed.

Broom moved to approve S-20-01 - Amendment of Bennett Minor subdivision plat. Bohrer seconded the motion. Motion carried 3-0.

(Due to lack of a quorum at the January 7th meeting of the Planning & Zoning Commission, the Sketch/Prelim for both of these items was approved by they BCC at the January 13th meeting)

- S-26-01 - Skull Creek Casitas Minor-Final (see attached)

This is a four-lot minor resubdivision of Skull Creek Estates. There are no concerns from the Road & Bridge Department, the Sheriff's Office, or the Division of Water Resources – there are no water requirements.

Villard asked if anyone present wanted to testify either for or against this request; there was none. The Public Hearing was closed.

Back in regular session, Bohrer moved to approve S-26-01 - Skull Creek Casitas Minor-Final. Broom seconded the motion. Motion carried 3-0.

- S-26-02 - Kama Investments LLC Minor-Final (see attached)

This 49.148-acre parcel is being divided into a three-lot minor subdivision. There were no concerns from the Road & Bridge Department or the Sheriff's Office. Division of Water Resources had concerns due to an existing residence on one of the lots that pulls water directly from the river with a senior water right. They would need to work with DWR regarding the split water rights.

Villard asked if anyone present wanted to testify either for or against this request; there was none. The Public Hearing was closed.

Back in regular session, Broom moved to approve S-26-02 – Kama Investments Minor-Final. Bohrer seconded the motion. Motion carried 3-0.

Meeting adjourned at 8:57 am

The next scheduled Board of County Commissioners meeting is Tuesday, February 24, 2026

Submitted by:

Erin Miller, Deputy Clerk and Recorder

Approved by: _____

Approved on: _____

Attest by: _____

Link to view this meeting on the Moffat County YouTube channel:

<https://www.youtube.com/channel/UC0d8avRo294jia2irOdSXzQ>

RESOLUTION 2026-24
 VOIDED WARRANTS RESOLUTION
 FOR THE MONTH OF FEBRUARY

WHEREAS, The Board of Commissioners of Moffat County, Colorado, have approved the payment of various debts and obligations from the various county funds:

AND WHEREAS, the warrants issued in payment of said debts and obligations have been issued against the Moffat County Warrant Fund:

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to transfer money among the various funds as follows:

2.24.26

TO: WARRANT FUND	10-0000-2003	\$	4,560.27	CR
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VOID FUND	WARRANT #		VENDOR NAME		
GENERAL	442429	1.13.26	Funky Dodo Dirtworks lost in mail	\$	4,560.27 DR

FROM: WARRANT FUND	10-0000-1001	\$	4,560.27	
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Adopted this 24th day of February, 2026

 Chairman

STATE OF COLORADO)
)ss.
 COUNTY OF MOFFAT)

I, Erin Miller, (Deputy) County Clerk and Ex-officio Clerk to the Board of County Commissioners, County of Moffat, State of Colorado do hereby certify that the above and foregoing is a true and complete copy of the resolution as adopted on the date stated.

WITNESS my hand and seal this 24th day of February, A.D. 2026

DR

 County Clerk & Ex-officio

RESOLUTION 2026-25
 TRANSFER OF INTERGOVERNMENT FUNDS
 FOR THE MONTH OF FEBRUARY 2026

WHEREAS, The budget of Moffat County defines moneys that are to be cleared from the various funds.

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to clear the following sum of money between the funds as indicated:

<i>From: (Fund)(CREDIT)</i>	<i>Amount</i>	<i>To: (Fund) (DEBIT)</i>	<i>Amount</i>
SUNSET MEADOWS II	2,255.33	GENERAL	2,255.33
TOTALS	<u>\$ 2,255.33</u>	TOTALS	<u>\$ 2,255.33</u>

Adopted this 24th day of February, A.D. 2026

Chairman

COUNTY OF MOFFAT)
)ss

I, Erin Miller, County Clerk and Ex-officio Clerk to the Board of County Commissioners, County of Moffat, State of Colorado do hereby certify that the above and foregoing is a true and complete copy of the resolution as adopted on the date stated.

WITNESS my hand and seal this 24th day of February, A.D. 2026

Clerk & Recorder

RESOLUTION 2026-26
TRANSFER OF PAYMENT OF WARRANTS
FOR THE MONTH OF DECEMBER 2025

WHEREAS, The Board of Commissioners of Moffat County, Colorado, have approved the payment of various debts and obligations from the various county funds:

AND WHEREAS, the warrants issued in payment of said debts and obligations have been issued against the Moffat County Warrant Fund:

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to transfer money among the various funds as follows:

FROM FUND:	Check Date:	2/24/2026		
General	110	<u>\$23,440.00</u>	CR	0010.7000
Road & Bridge	200	<u>\$95,280.15</u>	CR	0020.7000
Landfill	240	<u> </u>	CR	0070.7000
Airport	260	<u> </u>	CR	0120.7000
Emergency 911	270	<u> </u>	CR	0350.7000
Capital Projects	510	<u> </u>	CR	0160.7000
Conservation Trust	211	<u> </u>	CR	0060.7000
Library	212	<u>\$1,951.45</u>	CR	0130.7001
Maybell Sanitation	610	<u> </u>	CR	0280.7000
Health & Welfare	720	<u>\$5,952.25</u>	CR	0080.7000
Senior Citizens	215	<u> </u>	CR	0170.7000
Internal Service Fund	710	<u> </u>	CR	0325.7000
Lease Purchase Fund	410	<u> </u>	CR	0175.7000
NCT Telecom	520	<u> </u>	CR	0166.7000
Mo Co Tourism Assoc	219	<u> </u>	CR	0320.7000
PSC - JAIL	210	<u>\$49,301.56</u>	CR	0072.7000
Human Sevices	220	<u> </u>	CR	0030.7100
Public Health	250	<u> </u>	CR	0065.7000
Sunset Meadows I	910	<u> </u>	CR	0168.7000
Sunset Meadows I Security	910	<u> </u>	CR	0167.7000
Sunset Meadows II	920	<u> </u>	CR	0169.7000
Sunset Meadows II Security	920	<u> </u>	CR	0171.7000
ACET	275	<u> </u>	CR	0040.7000
Shadow Mountain LID	530	<u> </u>	CR	0110.7000
MC Local Marketing District	231	<u> </u>	CR	0050.7000
To Fund				
Warrant		<u>\$175,925.41</u>	DR	

Adopted this 24th day of February, 2026

Chairman

RESOLUTION 2026-27
TRANSFER OF PAYMENT OF WARRANTS
FOR THE MONTH OF JANUARY 2026

WHEREAS, The Board of Commissioners of Moffat County, Colorado, have approved the payment of various debts and obligations from the various county funds:

AND WHEREAS, the warrants issued in payment of said debts and obligations have been issued against the Moffat County Warrant Fund:

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to transfer money among the various funds as follows:

FROM FUND:	Check Date:	2/24/2026		
General	110	<u>\$222,381.12</u>	CR	0010.7000
Road & Bridge	200	<u>\$91,973.39</u>	CR	0020.7000
Landfill	240	<u>\$2,501.24</u>	CR	0070.7000
Airport	260	<u>\$3,000.00</u>	CR	0120.7000
Emergency 911	270	<u>\$4,792.49</u>	CR	0350.7000
Capital Projects	510	<u>\$9,235.92</u>	CR	0160.7000
Conservation Trust	211	_____	CR	0060.7000
Library	212	<u>\$10,835.11</u>	CR	0130.7001
Maybell Sanitation	610	_____	CR	0280.7000
Health & Welfare	720	<u>\$211,893.64</u>	CR	0080.7000
Senior Citizens	215	<u>\$1,190.20</u>	CR	0170.7000
Internal Service Fund	710	_____	CR	0325.7000
Lease Purchase Fund	410	_____	CR	0175.7000
NCT Telecom	520	_____	CR	0166.7000
Mo Co Tourism Assoc	219	<u>\$33.58</u>	CR	0320.7000
PSC - JAIL	210	<u>\$39,001.07</u>	CR	0072.7000
Human Sevices	220	<u>\$5,764.04</u>	CR	0030.7100
Public Health	250	<u>\$943.45</u>	CR	0065.7000
Sunset Meadows I	910	<u>\$37,171.28</u>	CR	0168.7000
Sunset Meadows I Security	910	_____	CR	0167.7000
Sunset Meadows II	920	<u>\$13,660.24</u>	CR	0169.7000
Sunset Meadows II Security	920	_____	CR	0171.7000
ACET	275	<u>\$1,500.00</u>	CR	0040.7000
Shadow Mountain LID	530	_____	CR	0110.7000
MC Local Marketing District	231	_____	CR	0050.7000
To Fund				
Warrant		<u>\$655,876.77</u>	DR	

Adopted this 24th day of February, 2026

Chairman

RESOLUTION 2026-28
TRANSFER OF PAYMENT OF WARRANTS
FOR THE MONTH OF FEBRUARY 2026

WHEREAS, The Board of Commissioners of Moffat County, Colorado, have approved the payment of various debts and obligations from the various county funds:

AND WHEREAS, the warrants issued in payment of said debts and obligations have been issued against the Moffat County Warrant Fund:

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to transfer money among the various funds as follows:

FROM FUND:	Check Date:	2/24/2026		
General	110	<u>\$30,343.66</u>	CR	0010.7000
Road & Bridge	200	<u>\$3,016.30</u>	CR	0020.7000
Landfill	240	<u>\$325.00</u>	CR	0070.7000
Airport	260	<u> </u>	CR	0120.7000
Emergency 911	270	<u>\$204.01</u>	CR	0350.7000
Capital Projects	510	<u>\$8,598.60</u>	CR	0160.7000
Conservation Trust	211	<u> </u>	CR	0060.7000
Library	212	<u>\$3,062.63</u>	CR	0130.7001
Maybell Sanitation	610	<u> </u>	CR	0280.7000
Health & Welfare	720	<u> </u>	CR	0080.7000
Senior Citizens	215	<u>\$2,032.62</u>	CR	0170.7000
Internal Service Fund	710	<u> </u>	CR	0325.7000
Lease Purchase Fund	410	<u> </u>	CR	0175.7000
NCT Telecom	520	<u>\$972.98</u>	CR	0166.7000
Mo Co Tourism Assoc	219	<u>\$1,737.52</u>	CR	0320.7000
PSC - JAIL	210	<u>\$10,533.12</u>	CR	0072.7000
Human Sevices	220	<u>\$2,697.47</u>	CR	0030.7100
Public Health	250	<u>\$2,671.09</u>	CR	0065.7000
Sunset Meadows I	910	<u>\$1,981.89</u>	CR	0168.7000
Sunset Meadows I Security	910	<u> </u>	CR	0167.7000
Sunset Meadows II	920	<u>\$1,773.50</u>	CR	0169.7000
Sunset Meadows II Security	920	<u> </u>	CR	0171.7000
Museum	229	<u> </u>	CR	0310.7000
ACET	275	<u>\$5,148.68</u>	CR	0040.7000
Shadow Mountain LID	530	<u> </u>	CR	0110.7000
MC Local Marketing District	231	<u> </u>	CR	0050.7000
To Fund				
Warrant		<u>\$75,099.07</u>	DR	

Adopted this 24th day of February,

2026

Chairman

RESOLUTION 2026-29
 PAYMENT OF PAYROLL WARRANTS
 Payroll Ending 2/14/2026

WHEREAS, The Board of Commissioners of Moffat County, Colorado, have approved the payment of various debts and obligations from the various county funds:

AND WHEREAS, the warrants issued in payment of said debts and obligations have been issued against the Moffat County Warrant Fund:

NOW THEREFORE, BE IT RESOLVED that the Moffat County Treasurer be and he is hereby authorized to transfer money among the various funds as follows:

Pay Date 2/27/2026

FROM FUND:			
General	0010.7000	\$329,962.47	cr
Road & Bridge	0020.7000	\$201,566.07	cr
Landfill	0070.7000	\$18,286.08	cr
Airport	0120.7000	\$1,491.96	cr
Library	0130.7001	\$13,802.30	cr
Maybell WWTF	0280.7000	\$0.00	cr
Health & Welfare	0080.7000	\$0.00	cr
Senior Citizens	0170.7000	\$9,387.12	cr
Mo Co Tourism	0320.7000	\$3,944.56	cr
PSC Jail	0072.7000	\$88,508.40	cr
Human Services	0030.7100	\$88,678.16	cr
Public Health	0065.7000	\$16,128.91	cr
SM I	0168.7000	\$5,107.05	cr
SM II	0169.7000	\$6,514.14	cr
TO FUND:			
Warrant	0100.1000	\$783,377.22	dr

Adopted this 24th day of February, A.D. 2026

 Chairman

STATE OF COLORADO)
)ss.
 COUNTY OF MOFFAT)

I, Stacy Morgan, County Clerk and Ex-officio Clerk to the Board of County Commissioners, County of Moffat, State of Colorado do hereby certify that the above and foregoing is a true and complete copy of the resolution

MOFFAT COUNTY WILDLAND FIRE OPERATING PLAN

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PREAMBLE

This operating plan is prepared pursuant to the current Statewide Cooperative Wildland Fire Management and Stafford Act Response Agreement (Statewide Agreement) for the State of Colorado and the Statewide Fire Operating Plan.

PURPOSE

The purpose of this Fire Operating Plan (OP) is to set forth standard operating procedures, agreed upon procedures, and responsibilities to implement cooperative wildfire protection on all lands within Moffat County. This plan addresses only wildfire incidents.

Participants in this OP consist of the following:

- Moffat County Sheriff on behalf of the County
- Moffat County Board of County Commissioners
- Medicine Bow - Routt National Forest and Thunder Basin National Grassland (USFS)
- White River National Forest (USFS)
- Little Snake Field Office of the Bureau of Land Management (BLM)
- White River Field Office of the Bureau of Land Management (BLM)
- Dinosaur National Monument (NPS)
- Browns Park National Wildlife Refuge (USFWS)
- Artesia Fire Protection District
- Craig Fire Protection District
- Colorado Division of Fire Prevention and Control (DFPC)

All participants of this plan agree to coordinate their wildfire protection activities as outlined herein.

AUTHORITIES

- Colorado Statewide Cooperative Wildland Fire Management and Stafford Act Response Agreement Between:
 - United State Department of the Interior
 - Bureau of Land Management – Colorado
 - National Park Service – Intermountain Region
 - Bureau of Indian Affairs – Southwest Region
 - U.S. Fish and Wildlife -COLO_COOP_2021-FF06R03000
 - United States Department of Agriculture
 - Forest Service – Rocky Mountain Region Agreement Number 21-FI-11020000-001
 - Forest Service – MBRTB Agreement Number 21-FO-11020600-049
- Moffat County Memorandum of Understanding For Participation in the Colorado Emergency Fire Fund
- Agreement for Cooperative Wildfire Protection in Moffat County

RECITALS

National Response Framework activities will be accomplished utilizing established dispatch coordination concepts. Situation and damage assessments information will be transmitted through established fire suppression intelligence channels.

Jurisdictional Agencies are responsible for all planning documents i.e. land use, resource and fire management plans and decision support documents, for a unit's wildland fire and fuels management program.

Protecting Agencies implements the actions documented and directed by the appropriate planning documents and decision support documents for initial and extended attack on wildfire incidents. They provide the supervision and support including operational oversight, direction and logistical support to Incident Management Teams.

INTERAGENCY COOPERATION

Jurisdictional Roles

FIRE PROTECTION RESPONSIBILITIES

Each jurisdictional agency has ultimate responsibility for wildfire protection on its own lands. The Sheriff is responsible for wildfire protection on all non-federal lands in Moffat County, not incorporated in a fire protection district.

Interagency Dispatch Centers

Northern Colorado (NCC) will act as dispatch for Moffat County Sheriff's Office initial response. The agency that can take the quickest effective fire response will be dispatched for initial response. The jurisdictional agency will assume command of the incident at the earliest possible time. Notification of all other agencies that are, or may be affected, is the responsibility of the NCC.

MAC GROUP (Multi Agency Coordination)

Local MAC Group: If a fire threatens to cross-jurisdictional boundaries and could become a multi-agency fire, a local MAC Group will be formed. The purpose of the MAC Group will be to meet as a group and identify policies, objectives, and strategy, resulting in one common set of objectives given to a single incident commander for tactical implementation. It will also be the responsibility of the LMAC Group to determine cost sharing for multi-jurisdictional fires.

The LMAC Group may consist of:

- Moffat County Commissioner's Office.
- Moffat County Sheriff's Office: Sheriff or their designee.
- Colorado Division of Fire Prevention and Control or their designee.
- Medicine Bow - Routt National Forest – Routt Zone: Routt FMO or their designee.
- White River National Forest or their designee
- Dinosaur National Monument: Monument Superintendent or their designee.
- Bureau of Land Management-Little Snake and/or White River Field Manager(s) or their designee
- Browns Park National Wildlife Refuge: Complex Project Leader or their designee

INITIAL RESPONSE DISPATCH LEVELS

Initial response plans, also referred to as run cards or pre-planned response plans, specify the fire management response (e.g. number and type of suppression assets to dispatch) within a defined geographic area to an unplanned ignition, based on fire weather, fuel conditions, fire management objectives, and resource availability. Response levels are identified and documented in the Northern Colorado Interagency Dispatch Area Fire Danger Operating Plan. Initial response dispatch levels are not predetermined for county resources in Moffat County but are based on the availability of personnel at the time of dispatch.

MUTUAL AID DISPATCH AREAS BY DISPATCH LEVEL

All dispatches will be made based on the closest forces capable of responding to the incident.

MUTUAL AID MOVE-UP AND COVER FACILITIES

Move up and cover procedures will be requested and coordinated through NCC.

REINFORCEMENTS AND SUPPORT

The Incident Commander, using appropriate ordering procedures as follows, will make all requests for additional resources beyond initial response:

Moffat County Sheriff, Routt National Forest, BLM, NPS, USFWS, and DFPC will order through NCC. Fire Protection Districts will be dispatched through Craig Regional Communications Center (CRCC).

Interagency Resources

A Directory of Agency Representatives is located in **Exhibit A**.

Standards

INCIDENT COMMAND SYSTEM USE

The Incident Command System (ICS) will be utilized on all wildland fire. ICS is a standardized method of managing emergency incidents.

QUALIFICATIONS

Red cards are not required for initial attack by some non-federal resources, but firefighters without red cards will be the first ones released by the jurisdictional agency. In most cases this will occur no later than the next operational period.

Personnel responding to incidents on BLM Lands must meet the following requirements;

- Be 18 years of age or older;
- Have and use required personal protective equipment (PPE) found in chapter 7 of the Interagency Standards for Fire and Fire Aviation Operations (Red Book); and
- Hold the qualification of NWCG Firefighter Type 2.

If responders are not NWCG qualified during the mutual aid periods, each agency is responsible for their own personnel and resources.

PERSONAL PROTECTIVE EQUIPMENT

All fireline personnel at the incident, including during the mutual aid period, must be equipped with personal protective equipment that meets standards identified in the Interagency Standards for Fire and Aviation Operations-NFES 2724 (Red Book), Chapter 7 (hardhat, eye protection, Nomex

shirt and trousers, leather gloves, minimum 8-inch-high leather boots with lug soles, and a fire shelter).

EQUIPMENT INSPECTION SCHEDULES

Equipment will be inspected based on need as determined by the agency responsible for such equipment. All DFPC and cooperator engines subject to interagency fire use will be inspected, both engine and equipment, to ensure use and road worthiness.

PREPAREDNESS

Protection Planning

This OP is the only County Interagency plan in use for Moffat County and addresses only wildland fire.

Protection Areas and Boundaries

The BLM map, (1/2" = 1 mile) is used to show jurisdictional boundaries for the purpose of this plan. The Moffat County Sheriff is responsible for wild fire control on all state and private lands within Moffat County. On federal lands, the agency charged with managing those lands is responsible for fire management.

Reciprocal (Mutual Aid) Fire Assistance

In the event a fire occurs within Moffat County the closest forces concept will be used. It is agreed that there should be no delay in response pending determination of the precise location of the fire, land ownership or responsibility. Upon receiving the report of a fire NCC or CRCC will dispatch initial response forces and notify the jurisdictional agency. Once ownership has been determined, the responsible agency shall relieve the personnel of the assisting agency at the earliest possible time.

The mutual aid period is defined as the time of initial dispatch and ends at either midnight of the first operational period or midnight of the second operational period. All mutual aid periods will preferably end at midnight for ease of financial accounting and the development of cost share agreements.

Each agency will make its personnel and equipment available upon request to the other agencies. It is understood however, that no agency will be required or expected to commit its forces to assisting another agency to the extent of jeopardizing its own responsibilities or the security of lands it is charged with protecting.

MUTUAL AID RESOURCES

Mutual Aid protection has been established countywide between all signatories to this plan. It is agreed there should be no delay in initial attack pending determination of the precise location of the fire, land ownership, or responsibility. All federal, state, and local resources are considered mutual aid. The Jurisdictional Agency will not be required to reimburse the Supporting Agency(s) for costs incurred following the initial dispatch of any ground and aviation resources to the fire for the duration of the mutual aid period. Assistance beyond the Mutual Aid period will be reimbursable assistance, and the Supporting Agency may bill the Jurisdictional Agency for resources assigned to the fire outside the Mutual Aid period. It is understood that no supporting Agency will be required to assist, or expected to commit resources to a Jurisdictional Agency.

RESOLUTION OF DISPUTES

The primary purpose of this operating plan is to ensure prompt response to wildland fires. Any interagency dispute arising from these procedures will be resolved on site by the LMAC/MAC Group. When necessary, following the conclusion of the fire incident, a panel of agency representatives other than the participants in the incident will review and resolve the disputes.

Acquisition of Services

N/A

Joint Projects and Project Plans

MOBILIZATION GUIDES

NCC maintains a mobilization guide. This guide may be useful to the county for obtaining private sector wildland fire resources.

LAND USE PLANNING (WILDLAND-URBAN INTERFACE)

Community Wildfire Protection Plans (CWPPs) have been completed for communities in Moffat County. The completed plans include: Knez Divide, Baker's Peak, Wilderness Ranch and Greystone. Information regarding CWPPs can be found on the Colorado State Forest Service website: <https://csfs.colostate.edu/>.

Fire Prevention

A. GENERAL COOPERATIVE ACTIVITIES

When cooperating agencies determine that a high enough fire danger warrants them, fire prevention/suppression patrols may be initiated. If prevention patrol personnel are signed up as AD's, they could be required to respond within Moffat County. Volunteer patrol personnel will not be required to respond.

B. INFORMATION AND EDUCATION

1. FIRE DANGER

a. FIRE WEATHER STATION LOCATIONS

There are 4 remote automatic weather stations for use in Moffat County; Ladore (BLM), Dinosaur (NPS), Great Divide (BLM) and Calico (BLM).

b. DATA SHARING AND METHODS

NCC and local FMOs monitors local fire danger levels. This information is available to local cooperators upon request. Daily Situation Statistics are on the web site: http://gacc.nifc.gov/rmcc/dispatch_centers/r2ncc/.

c. DAILY BRIEFINGS

During fire season, NCC prepares a daily briefing that includes weather forecasts, resource status, and incident status. Participation in the daily briefing via conference call can be made by calling 1-877-428-9134 and the passcode is 170902. This is available by 10 A.M. on the internet at: http://gacc.nifc.gov/rmcc/dispatch_centers/r2ncc/

d. FIRE DANGER DISSEMINATION

NCC will broadcast the fire weather forecast between 1600 -1630 daily,

during the fire season. Morning weather and fire danger will be available at Daily Briefing or on the NCC web page.

- e. FIRE PREVENTION SIGNS
Each agency will determine when and where to place fire prevention signs.

- 2. JOINT OR SINGLE AGENCY PRESS RELEASES
Each agency will prepare and release fire prevention material and media presentations according to its own prevention plans. Coordination with other agencies should be maintained in order to prevent a conflict in released material. Where pertinent, all news releases for fire prevention will carry USFS, DFPC, BLM, NPS, USFWS, fire district or county sheriff by-line.
- 3. "FIREWISE" PROGRAMS
This program is available through the CSFS and other cooperating agencies.
- 4. RED FLAG ANNOUNCEMENTS
The National Weather Service in Grand Junction periodically issues "RED FLAG" warning bulletins and fire weather watches. When these bulletins are announced, NCC will notify the Moffat County Sheriff's Office, Craig Regional Communication Center (CRCC), and the DFPC NW Regional Battalion Chief. These dispatches are also broadcast on the BLM/USFS radio frequencies.

Public Use Restrictions

Fire restrictions and closures should be coordinated to include private, state, and federal lands when possible. Refer to the Northern Colorado Interagency Fire Operating and Preparedness Plan (FDOP). Jurisdictional agencies should jointly prepare and promptly distribute media releases concerning the closure. In the case of any restrictions on burning or public movements because of extreme fire danger, either by Governor's proclamation or by local issue, the county sheriff will be responsible for enforcement on all non-federal lands, and may assist on other lands at the request of the appropriate agency.

Burning Permits

No burn permit is required in Moffat County for open burning within the County, except during restrictions or closures. For prescribed burns the jurisdictional agency will follow agency prescribed fire policy and procedures, and notify Moffat County Sheriff's Office and NCC. Such notification should include the location, timing, and nature of prescribed burns.

Prescribed Fire (Planned Ignitions) and Fuels Management

If parties to this Agreement conduct a cooperative prescribed fire details covering cost sharing, reimbursement, and responsibility for suppression costs, should it escape, shall be agreed upon and documented in the burn plan.

Wildfires resulting from escaped prescribed fires, ignited by, or at the direction of, or under the supervision of any party to this agreement, shall be the responsibility of that party, and all suppression costs shall be borne by that party. The party responsible for the escaped prescribed fire will reimburse other parties to this Plan consistent with the terms and conditions contained herein for costs incurred in suppression of such fires.

Smoke Management

N/A

OPERATIONS

Fire Notifications

Initial attack resources will ensure that the jurisdictional agency is promptly notified of a fire through the appropriate dispatch center. The County Sheriff and/or the appropriate FPD will be notified of wildland fires or wildfires occurring in their jurisdiction. If the fire is on or threatening state or private land, and is expected to exceed the control capabilities of the County, the DFPC Battalion Chief will be notified. If the fire is on land managed by BLM, NPS, Routt National Forest, White River National Forest or USFWS, Craig Regional Communications Center will notify NCC.

DETECTION

Craig Regional Communication Center (CRCC) will receive reports of wildland fires from the public and will notify NCC and the responsible jurisdictional agency representative. NCC will in return notify CRCC of all wildland fires in Moffat County.

Boundary Line Fires

Boundary fires include (i) a fire burning jointly on two or more agencies lands, or will soon burn across the boundary, when the boundary line is known, (ii) when the fire location is known, but the jurisdictional boundary on the ground is unknown, or (iii) when the location of a reported fire is uncertain in relation to the jurisdictional boundary.

Response to Wildland Fire

SPECIAL MANAGEMENT CONSIDERATIONS

FEDERAL AGENCIES

Federal agencies and their associated jurisdictions operate under the following approved fire management plans: Northwest Colorado Fire Management Plan, Dinosaur National Monument Fire Management Plan, Routt National Forest Fire Management Plan and White River National Forest Fire Management Plan. These plans outline appropriate management responses which allows for full suppression through wildland fire for resource benefit. The appropriate management response within designated Wilderness, Wilderness Study Areas, "roadless" areas, and/or other areas identified for the full range of appropriate management responses as outlined in the fire management plans, will be conducted under the direction of the jurisdictional federal official.

All unplanned fires on federal land require a response and a decision. This is best communicated with clear objectives and an "incident strategy". The incident strategy should be based on the following criteria:

- Should lead to meeting the objectives
- Risk to firefighters (Life First Concepts/Risk Management – probability and the consequences of fire impacting values at risk vs. the risk to firefighters put in place to mitigate the risk of fire impacting values.)
- Fuels, Weather and Topography influencing the fire and the anticipated spread of the fire

- Values truly at Risk: Communities, Infrastructure, Watersheds, Social, Ecological, Cultural, etc.
- Partner agencies and their objectives (if the fire is or is expected to be multi-jurisdictional)
- Cost of meeting objectives
- Smoke Management: Coordination with the States and monitoring
- Desired conditions (outlined in a Land Management Plan or other documents)
- Resource Availability
- Fire modelling Tools
- Seasonality – duration of fire/change in conditions

Agency Administrators and Fire Managers should assess the criteria above and then develop a strategy to successfully manage the fire, and meet objectives. The strategy may use natural barriers, changes in weather, fuel changes or rely heavily on the efforts of firefighters and aircraft. It could be a combination of all these elements.

Use of mechanized equipment such as bulldozers, graders, etc., will not be permitted on federal lands, without the expressed approval of the appropriate federal official.

MOFFAT COUNTY SHERIFF

The Moffat County Sheriff's Office will use as a reference the Moffat County Wildland Fire Management Plan for the fire season.

Fires managed for multiple objectives on private land will be managed on a case-by-case basis involving the private landowner, the Sheriff's Office, the County Commissioners and the applicable management agencies.

FIRE OPERATIONS IN BEETLE KILL STANDS

Moffat County has a significant amount of beetle killed trees. Due to altered fuel conditions from these trees, personnel operating within the bark beetle environment should be aware of the imminent danger presented by dead and dying trees falling at an increasing rate across a broad forested landscape. The *USFS-R2 Fire Operations Guidance in Bark Beetle Stands* should be utilized when personnel are operating within the bark beetle environment. These guidelines can be found in the Northern Colorado Interagency Dispatch website located at: https://gacc.nifc.gov/rmcc/dispatch_centers/r2nccindex.htm

REPAIR OF WILDFIRE SUPPRESSION DAMAGE

Repair of fireline suppression damage is the responsibility of the jurisdictional agency. Rehabilitation is not covered under EFF. It may be authorized by the DFPC Agency Administrator only when part of the Incident Action Plan during the EFF period. On non-federal lands, including State lands, Moffat County is not responsible for repair of fireline suppression damage.

Decision Process

Federal agencies are required to complete an appropriate decision support tool for all wildfires that escape initial attack on federally managed lands, to determine the appropriate response. This is done via the Wildland Fire Decision Support System (WFDSS). This procedure requires Federal Agency Administrator participation. All agencies involved in initial attack should assist in the completion of the decision support tool. If there is a multiple ownership non-EFF fire with federal lands involved, the appropriate federal decision support tool will be prepared that incorporates

federal, state, county and private land interests.

Cooperation

N/A

Communication

In order to assist each of the cooperators and provide for a timely and safe response in the suppression of wildfires, each agency authorizes the use of their radio frequencies with cooperating agencies during suppression efforts.

Cost efficiency

N/A

Delegation of Authority

N/A

Preservation of Evidence

The jurisdictional agency will have primary responsibility for fire investigation, and any civil or criminal follow up actions taken. Fire origin and cause determination is required for EFF, FEMA incidents and all human caused fires on Federal lands.

All fire investigations will be conducted jointly by agencies having jurisdiction. Additionally, the jurisdictional agency will keep other responsible agencies informed of the status of its investigations and legal actions.

STATE EMERGENCY FIRE FUND (EFF)

1. INTENT

Moffat County is a participant in the EFF Agreement with DFPC.

When EFF is implemented, DFPC assumes responsibility and authority for all suppression activity until the fire is returned to county responsibility; however, the county must maintain a minimum level of participation after EFF is implemented as outlined in section IX.M.5.b.

2. FUNDING

Member counties contribute money annually, based on a DFPC assessment that considers the number of forested acres and valuation of private land.

3. ROLES

DFPC BATTALION CHIEF

Act for DFPC Director in the absence of an assigned Incident Agency Administrator; assist Sheriff in completing DFPC Analysis Form (DFPC1) for each shift; prepare DFPC Fire Funding Request (DFPC2); assure DFPC Director or their designee is aware of local situations and procedures.

MOFFAT COUNTY SHERIFF

Prepare DFPC Analysis Form (DFPC1) for potential EFF fires; sign Assumption of Fire

Control Duty Form (DFPC3) for fires that the DFPC Director or his designee approves for EFF; serve as county representative on LMAC group.

MOFFAT COUNTY COMMISSIONERS

Approve Assumption of Fire Control Duty Form (DFPC3) for fires that the DFPC Director or his designee approves for EFF.

OTHER AGENCIES

Provide Sheriff with personnel and equipment necessary to meet minimum county resource commitment for EFF.

4. LMAC MAC GROUP

All EFF fires will utilize a LMAC Group consisting of, at a minimum, Moffat County Sheriff, DFPC and a representative from the jurisdictional fire district. If land administered by another agency is threatened or involved, that agency will provide a member of the LMAC Group as outlined in section IX.G.1.

5. EFF ACTIVATION

Implementation of the EFF can happen only upon request from the County, and mutual agreement of both County and DFPC. For this reason, it is important that the DFPC Battalion Chief be notified immediately of fires on private/state lands within the county. Should the fire surpass, or threaten to surpass, the ability of county resources to contain it, EFF implementation can happen only with a DFPC representative on scene.

DFPC FORMS

- DFPC 1 prepared by Moffat County Sheriff and DFPC Battalion Chief
- DFPC 3 prepared by DFPC Battalion Chief with input from Moffat County Sheriff.
- WFDSS prepared by Incident Line Officer with input from DFPC Battalion Chief and Sheriff.

COUNTY RESPONSIBILITY

The minimum Moffat County commitment to a state responsibility fire shall be negotiated on a case-by-case basis.

EFF/DFPC RESPONSIBILITY

DFPC will provide an Agency Administrator for each EFF fire. DFPC will act as the fund administrator for all EFF fires.

6. EFF DEACTIVATION

DFPC will transfer control of an EFF fire back to Moffat County when fire spread is contained, the Agency Administrator's objectives have been met, and a written plan has been prepared for the next operational period.

MOP-UP AND PATROL

The county will be responsible for mop-up and patrol, after control of an EFF fire has been transferred back to the county from DFPC, according to an extended incident action plan.

USE AND REIMBURSEMENT OF INTERAGENCY FIRE RESOURCES

Cost Share Agreement (Cost Share Methodologies)

A written cost sharing agreement should be considered for any mixed-jurisdiction fire that escapes initial attack. However, cost sharing agreements should not influence the suppression of the fire. Cost sharing agreements may be negotiated after the fire is out; such agreements between the state and/or counties and federal land fire managers can be updated daily or whenever necessary.

Training

Standard approved fire training courses are provided periodically by DFPC, USFS, BLM, NPS, USFWS and other agencies. As these courses are scheduled, all cooperators will be informed and invited to participate. Training needs of all agencies within the County should be considered and priorities identified.

Communication Systems

See Operations, Response to Wildland Fire, Communications

Fire Weather Systems

See Fire Prevention Section B.1. a.

Aviation Operations

AVIATION MAP AND NARRATIVE

Federal agencies have mapped aviation hazards in their fire management action plans. This map is included in their fire management plan. Moffat County and DFPC have not developed an aviation map.

FLIGHT FOLLOWING/FREQUENCY MANAGEMENT

NCC will flight follow for aircraft ordered through them. If radio communication problems develop, NCC will coordinate with adjacent dispatch centers to provide flight following.

FIXED WING BASE MANAGEMENT

Moffat County will not manage or control an air tanker base in Moffat County.

UNMANNED AIRCRAFT SYSTEMS (UAS)

The utilization of UAS on wildfires or prescribed burns will be approved by and coordinated with the Incident Commander or Burn Boss before launch. The appropriate Interagency Dispatch Center will be notified when UAS is utilized on a wildfire or prescribed burn to account for airspace coordination. After jurisdiction is established, the UAS pilot must follow the jurisdictional agency's policies and operational protocols.

MULTI-MISSION AIRCRAFT (MMA)

To order the MMA, place the request through the appropriate Interagency Dispatch Center.

LEAD PLANE/AIR ATTACK ACTIVATION

The determination to use a lead plane or air attack will be made in accordance with national policy.

AVIATION REQUESTS AND OPERATIONS

All Federal and State aircraft will be ordered through NCC. The IC of the jurisdictional agency may make requests for tactical aircraft. Current and potential threats and values at risk should be provided to NCC upon ordering of aircraft. There is an aviation request form that provides guidance for aircraft ordering in the NCC Field Ops Guide.

The primary way to order aircraft for initial attack incidents is on the radio through the applicable Interagency Dispatch Center. The order should be made on the federal incident command frequency/channel found in the Northern Colorado Field Operations Guide. This will help confirm that ground resources on the incident have communication with incoming aviation resources.

Billing Procedures

REIMBURSABLE COSTS

Costs incurred by an assisting agency for services that exceed initial attack shall be considered reimbursable. These services must be requested by the jurisdictional agency through their dispatch center or documented by the incident commander in the fire report. Resources not documented by a resource order number or by the incident commander may not be reimbursable. A written cost-share agreement on multi-jurisdictional incidents will be completed as soon as possible. A sample cost-share agreement and guideline are attached as **Exhibit B**.

For the purpose of Cost Share Agreements, WFDSS will be used to calculate acreage based upon land ownership.

REIMBURSEMENT PROCEDURES

The county may aggregate expenses incurred by the county and fire districts to suppress fires on federal jurisdictions, and may present an invoice for such expenses to DFPC, who will then reimburse the county and subsequently bill the jurisdictional federal agency or agencies.

Federal agencies may submit bills and statements for reimbursement from county and/or fire districts for federal suppression on non-federal lands to DFPC. DFPC may make such reimbursement and subsequently invoice the county or fire district as appropriate.

All DFPC cooperators (non-Federal) subject to DFPC reimbursement will have invoices sent to the DFPC Finance Division in Fort Collins within 30 days after incident resources are released. The DFPC Finance Division will attempt to make payment as soon as possible after receiving the invoice. All invoices are required to have proper documentation before the process for payment can be completed. This will include information on personnel time, equipment time, rates of pay and resource order.

DFPC FIRE EQUIPMENT USE RATES

Cooperative Resource Rate forms (CRRF) between DFPC, the County, FPDs and VFDs will be completed every year to establish use rates for their equipment. Costs for equipment not covered by a CRRF may not be reimbursed by the jurisdictional agency. Reimbursement to the cooperator for full-time employees will be at current department pay rates. Pay rates for department members and others employed on an incident-by-incident basis will be documented per the procedures established in the Cooperator Reimbursement Guidelines.

Cost Recovery

N/A

GENERAL PROVISIONS

Personnel Policy

N/A

Modification

Modifications within the scope of this Operating Plan shall be made by mutual consent of the Parties, through the issuance of a written modification signed and dated by all Parties prior to any changes being performed. Any Party shall have the right to terminate their participation under this Operating Plan by providing six months' written notice to the other Parties.

Annual Review

This Operating Plan will remain current until a revised Operating Plan is signed by all parties. It is recommended that all parties meet annually to review the OP to ensure all parties agree and to foster continuing cooperation.

Duration of Agreement

This Operating Plan is executed as of the date of last signature and remains in effect for five years unless modified or superseded. If the current Colorado Statewide Fire Management and Stafford Act Response Agreement is superseded by a new Agreement, this Operating Plan may remain in effect to the extent that it does not conflict with provisions of the new Agreement, but only until such time that all activities and conditions can be incorporated into a new Operating Plan.

Previous Agreements Superseded

All prior plans are hereby superseded.

SIGNATURES

Authorized Representatives

MOFFAT COUNTY SIGNATURES

Moffat County Board of County Commissioners

Date

Moffat County Sheriff

Date

COLORADO DIVISION OF FIRE PREVENTION & CONTROL SIGNATURE

Yampa River Battalion Chief

Date

FEDERAL LAND MANAGEMENT AGENCY SIGNATURES

United States Forest Service, White River National Forest

Date

United States Forest Service Grants and Agreements

Date

United States Forest Service, Medicine Bow-Routt National Forest

Date

Bureau of Land Management, NW District Manager

Date

National Park Service, Dinosaur National Monument

Date

U.S. Fish & Wildlife Service, Lower Green River NWR Complex

Date

LOCAL FIRE AGENCIES SIGNATURES

Craig Fire Protection District

Date

Artesia Fire Protection District

Date

EXHIBITS

- A. DIRECTORY OF PERSONNEL AND AUTHORIZED AGENCY REPRESENTATIVES
- B. COST SHARE AGREEMENT DOCUMENTATION

EXHIBIT A**DIRECTORY OF PERSONNEL AND AUTHORIZED AGENCY REPRESENTATIVES**

<u>Colorado State Patrol (CRCC) 24 hours</u>	<u>970-824-6501</u>
<u>Moffat County Sheriff's Office</u> Chip McIntyre, Sheriff Charlene Abdella, Undersheriff Todd Wheeler, EMC/FMO/OEM	<u>970-824-4495</u>
<u>Northern Colorado Interagency Dispatch Center 24 hours</u>	<u>970-826-5037</u>
<u>Moffat County Commissioners</u> Donald Broom Melody Villard Tony Bohrer	<u>970-824-5517</u>
<u>Moffat County Road Dept.</u> Director, Dan Miller Manager, Bruce White Supervisor, Kenny Moncrief	<u>970-824-3211</u>
<u>Northwest District Fire</u> Michael St. Martin, Unit FMO Brandon Voeglte, Unit AFMO Kyle Frary, South Zone FMO Ken Boles, North Zone FOS	<u>970-826-5037</u>
<u>Northwest Colorado BLM</u> Robert Swithers, NW District Manager James Michels, NW Deputy District Manager	<u>970-826-5000</u> <u>970-826-5018</u> <u>970-749-7399</u>
<u>Little Snake Field Office</u> , Field Manager , Assistant Field Manager	<u>970-826-5000</u>
<u>White River Field Office</u> William Mills, Field Manager Kyle Arnold, Associate Field Manager James Robert, Assistant Field Manager	<u>970-878-3800</u>
<u>Maybell VFD</u> Bill Baker, Chief	<u>CRCC 970-824-6501</u>

Artesia FPD 801-657-9091
Ken Davis

Craig FPD 970-824-5914 or 970-824-6501
Chris Mercer, Chief 1
Troy Hampton, Chief 2
Steve Lingo, Chief 3

Colorado Division of Fire Prevention and Control
State of Colorado Emergency Operations 303-279-8855
Derrick Charpentier, Yampa River Battalion Chief 970-692-6863
Sam Parsons, NW District Chief
Ryan McCulley, NW Deputy District Chief

USFWS Browns Park National Wildlife Refuge 970-365-3613
Danielle Fujii-Doe, Refuge Manger
Tracy Swenson, Rocky Basin Zone FMO
Erik Haberstick, AFMO

Dinosaur National Monument 970-374-3000
Phil Akers, Superintendent

White River National Forest, Blanco District 970-878-4039
Brian Glaspell, Forest Supervisor
Curtis Keetch, Blanco District Ranger

Medicine Bow-Routt National Forest
Dawn Laybolt, Forest Supervisor 218-464-7352
Jeremy Dietz, Fire Staff FMO 307-760-6165
Jamie Statezny, Yampa District Ranger 719-717-0116
Michael Woodbridge, HPBE District Ranger 970-819-7046
Kevin Tompson, South Zone FMO 970-736-7060
Sean Carey, South Zone AFMO 970-819-4680

EXHIBIT B**Cost Share Agreement Documentation**

Negotiating cost share agreements within the State of Colorado has been delegated to the respective unit administrators in the Interagency Cooperative Fire Management Agreement. County officials must also be included. Cost share agreements are to be documented, including the basis or rationale used. The following guidelines should be considered when negotiating a cost share agreement. These are intended to help field personnel in negotiating an equitable agreement and are not intended to be mandatory.

Unit Administrator (Line Officer): the individual assigned administrative responsibilities for an established organizational unit, such as Forest Supervisors or District Rangers (USFS), District or Area Manager (BLM), Area Forester or State Forester Designate (State), Regional Director or Refuge Manager (USFWS), Park Superintendent (NPS), and Agency Superintendent (BIA), County Sheriff or his designee, and may include a county commissioner at the local level.

General Guidelines:

1. Agency budgeted costs normally are not shared.
2. Responsibility for claims is considered to be outside the scope of the cost share agreement.
3. Rehabilitation costs other than on the fireline are the responsibility of the jurisdictional Agency.
4. All cost share negotiations should include consideration to each Agency's values at risk and resources assigned.
5. Cost share agreements should normally be reviewed at the end of each burning period and documented with review date and time.

Method 1: Cost can be shared proportionately based upon the acreage burned.

Method 2: Costs between the Agencies can be based on a summary of daily estimated incident costs and each Agency's proportionate share thereof. If this method is used, daily cost sharing should be properly documented by the Incident Commander. Aircraft and retardant should be on an actual use basis.

Method 3: Costs can be shared based upon direct fireline resources assigned basis. Aviation resources, retardant, etc. should be on an actual use basis. Indirect costs are then shared proportional to direct costs. This is the most equitable method and should be utilized on incidents when a Type I team is assigned.

The cost centers that should be considered in this agreement:

Fireline Resources: Maintainers, dozers, engines, tenders, hand crews, line or overhead

Air support: Air tankers, helicopters, lead planes, air operations.

Direct Costs: All costs associated with direct fireline/fireground and operations including aircraft, except airtankers and their retardant, and incident support ordered by or for the incident prior to completion of the cost share agreement. Airtanker costs and associated retardant costs are direct costs but normally are calculated at a separate cost share rate.

Indirect Costs: Costs that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, and instructional activity, or any other institutional activity. These costs may include office support personnel, mobilization/demobilization centers, dispatching, airbase operations, transportation from home base to camp, and minor or major equipment repairs to incident-assigned and damaged equipment (except those costs included in equipment rental rates). Facilities and administrative costs can be shared proportionately with direct costs except where identified to be shared differently in the cost share agreement.

Sample Cost Share Agreement

Incident Name: _____ IA Number: _____
Start date & time: _____ Incident cause: _____
Incident jurisdiction: _____

Cost share documentation between _____ and Moffat County, and with the cooperation of the Colorado Division of Fire Prevention and Control (DFPC), was prepared with the following authorities provided by:

- 1. The Interagency Cooperative Fire Management Agreement between the State of Colorado; USDA Forest Service; UDSI Bureau of Land Management; USDI National Park Service; USDI Bureau of Indian Affairs; USDI Fish and Wildlife Service.
2. Agreement for Cooperative Wildfire Management between Moffat County and the State of Colorado.
3. Wildland Fire Operating Plan for Moffat County.

Agency Representatives participating in the development of the Cost Share Agreement:

Agency: _____ Name: _____ Title: _____
Agency: _____ Name: _____ Title: _____
Agency: _____ Name: _____ Title: _____

Date/time agreement starts: _____ Date/time agreement ends: _____

Each agency will cover their own cost during the Mutual Aid period per the Moffat County OP, which starts: Start Date/Time and ends: Ending Date/Time.

This Cost share agreement will be in effect and will not end until:

- The fire is called out and all resources have returned to their home unit or have been reassigned

OR

- An additional Cost Share is drafted, agreed upon and signed by all parties.

It is hereby agreed that the cost basis on this incident will be shared as follows:

(List any special conditions or resource objectives, i.e., aircraft ordering, mechanized restrictions or specific conditions. Operational responsibility will be defined in this section.)

Agency Authorized Signature

Agency Authorized Signature

State of Colorado Contract Modification Task Order

State Agency

Colorado Department of Public Health and Environment

Contractor

Board of County Commissioners of Moffat County (a political subdivision of the state of Colorado) for the use and benefit of Moffat County Public Health

Task Order Number

1

Main Task Order Contract Number

23 FAA 00058

Task Order Contract Number

2026*3206

Task Order Performance Beginning Date

The later of the Task Order Effective Date or March 23, 2026

Task Order Expiration Date

August 31, 2026

Task Order Maximum Amount

03/23/2026 - 08/31/2026: \$19,999.00

Total for All Terms: \$19,999.00

Exhibits and Order of Precedence

The following Exhibits and attachments are included with this Contract:

1. Exhibit A - Additional Provisions.
2. Exhibit B - Statement of Work.
3. Exhibit C - Budget.
4. Exhibit D - Contract Federal Provisions.

In the event of a conflict or inconsistency between this Contract and any Exhibit or attachment, such conflict or inconsistency shall be resolved by reference to the documents in the following order of priority:

1. Exhibit D - Contract Federal Provisions.
2. Colorado Special Provisions in §19 of the main body of this Contract.
3. The provisions of the other sections of the main body of this Contract.
4. Exhibit A - Additional Provisions.
5. Exhibit B - Statement of Work.
6. Exhibit C - Budget.

In accordance with **§4.B** of the Main Task Order Contract referenced above, Contractor shall complete the following Project:

1. Project Description

Contractor shall complete the Project described in Exhibit B - Statement of Work (SOW) that is attached hereto and incorporated herein (the "SOW"). All terminology used in this Task Order and the Statement of Work shall be interpreted in accordance with the Main Task Order Contract unless specifically defined differently in this Task Order. The Statement of Work and Budget are incorporated herein, made a part hereof and attached hereto as Exhibit B - Statement of Work and Exhibit C - Budget.

2. Payment

The State shall pay Contractor the amounts shown in Exhibit C - Budget that is attached hereto and incorporated herein, in accordance with the requirements of that Proposal and the Main Task Order Contract. The State shall not make any payment for a Term that exceeds the Task Order Maximum Amount shown above for that Term.

3. Performance Period

Contractor shall complete all Work on the Project described in this Task Order by the Task Order Expiration Date stated above. Contractor shall not perform any Work on the Project described in the Proposal prior to the Task Order Performance Beginning Date or after the Task Order Expiration Date stated above.

4. Task Order Effective Date

The effective date of this Task Order is upon approval of the State Controller or March 23, 2026, whichever is later.

Contractor

Board of County Commissioners of
Moffat County (a political subdivision of the
state of Colorado) for the use and benefit of
Moffat County Public Health

State of Colorado

Jared S. Polis, Governor
Colorado Department of Public Health
and Environment
Jill Hunsaker Ryan, MPH, Executive
Director

By: Sarah "Becky" Copeland, Director

By: Chelsea Gilbertson, Procurement &
Contracts Section Director

Date: _____

Date: _____

State Controller

Robert Jaros, CPA, MBA, JD

By: Kurt Williams, Controller

Task Order Effective Date: _____

In accordance with §24-30-202, C.R.S., this Task Order is not valid until signed and dated above by the State Controller or an authorized delegate.

ADDITIONAL PROVISIONS

To Original Contract Routing Number 2026*3206

These provisions are to be read and interpreted in conjunction with the provisions of the Contract specified above.

1. Invoicing Provisions:

To receive compensation under the Contract, the Contractor shall submit a signed **Quarterly** CDPHE Reimbursement Invoice Form. This form is accessible from the CDPHE internet website <https://cdphe.colorado.gov/standardized-invoice-form> and is incorporated and made part of this Contract by reference. CDPHE will provide technical assistance in accessing and completing the form. The CDPHE Reimbursement Invoice Form and Expenditure Details page must be submitted no later than **forty-five (45)** calendar days after the end of the billing period for which services were rendered. Expenditures shall be in accordance with the Statement of Work and Budget.

The Contractor shall submit the invoice using the method listed below:

Scan the completed and signed CDPHE Reimbursement Invoice Form into an electronic document. Email the scanned invoice and Expenditure Details page to: Beth Wyatt at beth.wyatt@state.co.us.

Final billings under the Contract must be received by the State within a reasonable time after the expiration or termination of the Contract; but in any event no later than **forty-five (45)** calendar days from the effective expiration or termination date of the Contract.

Unless otherwise provided for in the Contract, "Local Match", if any, shall be included on all invoices as required by funding source.

The Contractor shall not use federal funds to satisfy federal cost sharing and matching requirements unless approved in writing by the appropriate federal agency.

2. Acceptance of Deliverables - Time Limit:

- a. Evaluation Period. The State shall have **30** calendar days from the date a deliverable is delivered to the State by the Contractor to evaluate that deliverable, except for those deliverables that have a different time negotiated by the State and the Contractor.
- b. Notice of Defect. If the State believes in good faith that a deliverable fails to meet the design specifications for that particular deliverable, or is otherwise deficient, then the State shall notify the Contractor of the failure or deficiencies, in writing, within **30** calendar days of: 1) the date the deliverable is delivered to the State by the Contractor if the State is aware of the failure or deficiency at the time of delivery; or 2) the date the State becomes aware of the failure or deficiency. The above time frame shall apply to all deliverables except for those deliverables that have a different time negotiated by the State and the Contractor in writing pursuant to the State's fiscal rules.
- c. Time to Correct Defect. Upon receipt of timely written notice of an objection to a completed deliverable, the Contractor shall have a reasonable period of time, not to exceed **30** calendar days, to correct the noted deficiencies.

3. Health Insurance Portability and Accountability Act (HIPAA) Business Associate Determination:

The State has determined that this Contract does not constitute a Business Associate relationship under HIPAA.

4. Contractor shall request prior approval in writing from the State for all modifications to the Statement of Work/Work Plan, or for any modification to the direct costs in excess of twenty-

EXHIBIT A

five percent (25%) of the total budget for direct costs, or for any modifications to the indirect cost rate. Any request for modifications to the Budget in excess of twenty-five percent (25%) of the total budget for direct costs, or any modifications to indirect cost rates, shall be submitted to the State at least ninety (90) days prior to the end of the contract period and may require an amendment in accordance with General Provisions, Section 18, Modifications, Paragraph I, or Option Letter Provisions of this Contract.

5. Contractor agrees to provide services to all Program participants and employees in a smoke-free environment in accordance with Public Law 103-227, also known as "the Pro-Children Act of 1994", (Act). Public Law 103-227 requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, early childhood development services, education or library services to children under the age of eighteen (18), if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee.
6. The State of Colorado, specifically the Colorado Department of Public Health and Environment, shall be the owner of all equipment as defined by Federal Accounting Standards Advisory Board (FASAB) Generally Accepted Accounting Principles (GAAP) purchased under this Contract. At the end of the term of this Contract, the State shall approve the disposition of all equipment.
7. Contractor shall not use State funds provided under this Contract for the purpose of lobbying as defined in Colorado Revised Statutes (C.R. S.) 24-6-301(3.5)(a).

STATEMENT OF WORK

To Original Contract Number: 2026*3206

These provisions are to be read and interpreted in conjunction with the provisions of the contract specified above.

I. Entity Name: Moffat County Public Health

II. Project Description:

This health project serves to establish county or regional overdose fatality review (OFR) teams across Colorado to decrease the incidence of preventable overdose deaths. This project will establish pilot OFR teams in nine Colorado counties in accordance with Senate Bill (SB)24-047, Part 23, which gives local public health agencies the authority to conduct these reviews. This project will benefit communities across Colorado to determine what factors and characteristics may lead to possible overdose deaths. Funding for this project will come from the Centers for Disease Control and Prevention's Overdose Data to Action (OD2A) cooperative agreement as an approved project activity. The funding will be used to help establish teams to fulfill the following duties as outlined by SB 24-047 *Prevention of Substance Use Disorders*:

1. Promote cooperation and coordination among agencies involved in the investigation of drug overdose fatalities;
2. Develop an understanding of the causes and incidence of drug overdose fatalities in the jurisdiction where the local team operates;
3. Plan for and recommend changes within the agencies represented on the local team to prevent drug overdose fatalities;
4. Advise local, regional, and state policymakers about potential changes to law, policy, funding, or practice to prevent drug overdoses.

III. Definitions:

1. **Business Days** – means any day in which the State is open and conducting business, but shall not include Saturday, Sunday, or any day on which the State observes one of the holidays listed in §24-11-101(1), C.R.S.
2. **CDPHE** – means Colorado Department of Public Health and Environment.
3. **Email** – means electronic mail.
4. **IT** - means information technology
5. **OD2A**– means Overdose Data to Action cooperative agreement.
6. **OFR** – means overdose fatality review. OFRs are a process in which a multi-disciplinary team performs a series of individual OFRs to effectively identify system gaps and identify innovative community-specific overdose prevention and intervention strategies.

EXHIBIT B

7. **Senate Bill 24-047** - means Colorado Revised Statute (C.R.S.) (§ 25-20.5-2301 — 25-20.5-2307)
- Concerning the Prevention of Substance Disorders. Part 23 Local Overdose Fatality Review
8. **Social Determinants of Health** - Social determinants of health are the nonmedical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live, worship, and age. These conditions include a wide set of forces and systems that shape daily life, such as economic policies and systems, development agendas, social norms, social policies, and political systems. CDC has adapted this definition from the World Health Organization.
www.cdc.gov/about/priorities/why-is-addressing-sdoh-important.html.

IV. Work Plan

Goal #1: Improve the health, well-being, and equity of all Coloradans through health promotion, prevention, and access to healthcare.

Objective #1: No later than the expiration date of this contract, enhance overdose prevention and intervention strategies by establishing a multidisciplinary OFR team that reviews a series of individual deaths.

Primary Activity #1: The Contractor shall develop protocols and procedures for the Contractor's OFR team.

Sub-Activity #1:

1. The Contractor shall recruit multidisciplinary members from the disciplines listed in C.R.S. 25-20.5-2303, which outlines required and allowable membership of an OFR team.
 2. The Contractor shall identify an OFR Team Chair with duties outlined in C.R.S. 25-20.5-2303 (3)(b)(I-VI).
 3. The Contractor shall obtain input from multidisciplinary members to inform the development of the Contractor's community OFR process and team.
 4. The Contractor shall create a process to document that OFR team members and nonmembers attending meetings understand the confidentiality standards, including:
 - a. The purpose and goal of the team
 - b. The requirements for maintaining the confidentiality of any information disclosed during OFR meetings.
 - c. Penalties associated with failure to maintain confidentiality.
 5. The Contractor shall verify that OFR team members and nonmembers attending meetings agree to the confidentiality standards by obtaining signatures.
-

Primary Activity #2: The Contractor shall develop a system to collect information about someone who dies from an overdose.

Primary Activity #3: The Contractor shall analyze whether their agency's IT infrastructure and capacity are capable of hosting a web-based application data collection system (i.e., REDCap or similar system)

Sub-Activity #3:

1. The Contractor shall provide updates in the monthly reports and communicate any technical issues.
-

Primary Activity #4: The Contractor shall use local and state data to determine which deaths will be reviewed as part of the Contractor's OFR.

Sub-Activity #4:

1. The Contractor shall determine which deaths to review by considering:
 - a. populations most at risk of overdose in the Contractor's community
 - b. feedback from people with lived experience
 - c. best practices in OFR
-

Primary Activity #5: The Contractor shall create a process(e) to use the information generated by the OFR team to prevent future overdose deaths in the Contractor's community.

Sub-Activity #5:

1. The Contractor shall create a process to make recommendations for prevention and intervention strategies to improve the coordination of services and investigations among member agencies to reduce overdose deaths.
 2. The Contractor shall create a process to track the implementation of recommendations made through the Contractor's OFR.
 3. The Contractor shall collect local data on overdose deaths.
 4. The Contractor shall analyze local data on overdose deaths.
 5. The Contractor shall summarize local data on overdose deaths.
 6. The Contractor shall maintain local data on overdose deaths.
-

Primary Activity #6: The Contractor shall complete the following reports:

- a. Monthly Progress Report.
 - b. Annual Report.
-

Standards and Requirements

1. The content of electronic documents located on CDPHE and non-CDPHE websites and information contained on CDPHE and non-CDPHE websites may be updated periodically during the contract term. The contractor shall monitor documents and website content for updates and comply with all updates.
 2. The Contractor shall comply with the Overdose Prevention content, which is located on CDPHE website <https://cdphe.colorado.gov/overdose-prevention> and is incorporated and made part of this contract by reference.
 3. CDPHE will host a community learning space for local OFR sites to share facilitators, barriers, and best practices at least quarterly via a virtual online platform.
 4. CDPHE will provide the Contractor with protocols for determining which deaths shall be reviewed as part of the OFR, upon the Contractor's request.
 5. Multidisciplinary members must include representatives from at least five (5) areas, including:
 - a. public health,
 - b. clinical services,
 - c. justice and public safety,
 - d. human services,
 - e. harm reduction, and
 - f. lived experience.
 6. There shall not be more than one (1) representative from law enforcement among the multidisciplinary members.
 7. The OFR Team Chair must be the county or district public health director
 8. The Contractor shall develop a system to collect the following information about someone who dies from an overdose:
 - a. The decedent's point of contact before their death with:
 - i. health care systems,
 - ii. social services,
 - iii. educational institutions,
 - iv. child and family services,
 - v. the criminal justice system, including law enforcement, and
 - vi. any other systems
 - b. Specific factors and social determinants of health that put the decedent at risk of an overdose
 - c. Next-of-kin interview information
 9. CDPHE will provide the Contractor with the Monthly Progress Report template, which includes the following questions, no later than 30 Business Days from contract execution:
 - a. List of activities accomplished during the past month.
-

EXHIBIT B

- b. List of activities to be accomplished in the upcoming month.
10. The Contractor shall share their annual report with CDPHE no later than 30 days from the end of the state fiscal year, as required by statute.
 11. The Contractor shall aggregate all information and may not share or otherwise disseminate personally identifiable information without a signed consent form from the decedent's next of kin.
 12. The Contractor shall comply with the requirements stated in Part 23 of Senate Bill 047 *Prevention of Substance Use Disorders*. This document is incorporated and made part of this contract by reference and is available on the following website: <https://leg.colorado.gov/bills/sb24-047>.
 13. The Contractor shall submit all deliverables to the CDPHE Overdose Prevention Program Coordinator via email at beth.wyatt@state.co.us.
 14. CDPHE will review all deliverables and provide feedback within ten (10) Business Days from the submission date of the deliverable.
 15. CDPHE will respond to all email communications within ten (10) Business Days from the date of receipt.
-

Expected Results of Activity(s)

1. Increase data-informed, community-driven prevention and intervention strategies to improve the coordination of services and investigations among member agencies to reduce overdose deaths.
 2. Improve understanding of the causes and incidence of drug overdose fatalities.
 3. Expand cooperation and coordination of services and investigations among OFR member agencies.
 4. Increase awareness of local, regional, and state policymakers about potential changes to law, policy, funding, or practice to prevent drug overdoses.
-

Measurement of Expected Results

1. CDPHE receives monthly progress reports.
 2. CDPHE receives a copy of the statutorily required annual report.
-

Deliverables

Description	Completion Date
1. The Contractor shall submit monthly progress reports	No later than 15 Business Days following the last day of the month, not to exceed the expiration date of this contract.
2. The Contractor shall submit a copy of the annual report.	No later than 10 days before the end of the contract period.

V. Monitoring

CDPHE’s monitoring of this contract for compliance with performance requirements will be conducted throughout the contract period by the CDPHE Overdose Prevention Program Coordinator. Methods used will include a review of documentation determined by CDPHE to be reflective of performance to include progress reports, annual reports, and other fiscal and programmatic documentation as applicable. The Contractor’s performance will be evaluated at set intervals and communicated to the Contractor. A Final Contractor Performance Evaluation will be conducted at the end of the life of the contract.

VI. Resolution of Non-Compliance

The Contractor will be notified in writing within **30** calendar days of discovery of a compliance issue. Within **30** calendar days of discovery, the Contractor and the State will collaborate, when appropriate, to determine the action(s) necessary to rectify the compliance issue and determine when the action(s) must be completed. The action(s) and time line for completion will be documented in writing and agreed to by both parties. If extenuating circumstances arise that requires an extension to the time line, the Contractor must email a request to the CDPHE Overdose Prevention Program Coordinator and receive approval for a new due date. The State will oversee the completion/implementation of the action(s) to ensure time lines are met and the issue(s) is resolved. If the Contractor demonstrates inaction or disregard for the agreed upon compliance resolution plan, the State may exercise its rights under the provisions of this contract.



COLORADO
 Department of Public
 Health & Environment

Version 1.2025

PREVENTION SERVICES DIVISION- FIXED PRICE BUDGET WITH JUSTIFICATION FORM
 Original Contract Routing #2026*3206

Contractor Name	Moffat County Public Health	Program Contact Name, Title, Phone and Email	Sarah "Becky" Copeland, Director, Registered Nurse, 970-291-8742, sarahcopeland@moffatcounty.net
Budget Period	upon execution - 8/31/26	Fiscal Contact Name, Title, Phone and Email	Sarah "Becky" Copeland, Director, Registered Nurse, 970-291-8742, sarahcopeland@moffatcounty.net
Project Name	OD2A - Overdose Fatality Review Program	Contract (CT or PO) Number	CT FHLA 2026*3206

Budget Information				
Primary Activity / Deliverable	Description of Activity	Rate	Quantity	Total Amount Requested from CDPHE
Deliverable #1 (monthly report)	The Contractor shall submit monthly progress reports: a list of activities accomplished during the past month and a list of activities to be accomplished in the upcoming month. The report should also include detailed information on progress toward the activities outlined in the Statement of Work (SOW). If meetings have commenced, include agendas, meeting notes, and a list of attending OFR members. Payable at \$2,857 for up to 7 reports and upon completion and approval of deliverables by CDPHE staff.	\$ 2,857.00	7.0	\$ 19,999.00
TOTAL				\$ 19,999.00

EXHIBIT D, CONTRACT FEDERAL PROVISIONS

APPLICABILITY OF PROVISIONS.

1.1. The Contract or Purchase Order to which these Federal Provisions are attached has been funded, in whole or in part, with an Award of Federal funds. In the event of a conflict between the provisions of these Federal Provisions, the Special Provisions, the body of the Contract or Purchase Order, or any attachments or exhibits incorporated into and made a part of the Contract or Purchase Order, the provisions of these Federal Provisions shall control.

2. COMPLIANCE.

2.1. Contractor shall comply with all applicable provisions of the Transparency Act, all applicable provisions of the Uniform Guidance, and the regulations issued pursuant thereto, including but not limited to these federal Provisions. Any revisions to such provisions or regulations shall automatically become a part of these Federal Provisions, without the necessity of either party executing any further instrument. The State of Colorado may provide written notification to Contractor of such revisions, but such notice shall not be a condition precedent to the effectiveness of such revisions.

3. SYSTEM FOR AWARD MANAGEMENT (SAM) AND UNIQUE ENTITY ID REQUIREMENTS.

3.1. SAM. Contractor shall maintain the currency of its information in SAM until the Contractor submits the final financial report required under the Award or receives final payment, whichever is later. Contractor shall review and update SAM information at least annually after the initial registration, and more frequently if required by changes in its information.

3.2. Unique Entity ID. Contractor shall provide its Unique Entity ID to its Recipient, and shall update Contractor's information at <http://www.sam.gov> at least annually after the initial registration, and more frequently if required by changes in Contractor's information.

4. CONTRACT PROVISIONS REQUIRED BY UNIFORM GUIDANCE APPENDIX II TO PART 200.

4.1. **Contracts for more than the simplified acquisition threshold**, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate. The simplified acquisitions threshold is \$250,000

- 4.2. **All contracts in excess of \$10,000 must address termination for cause and for convenience** by the non-Federal entity including the manner by which it will be effected and the basis for settlement.
- 4.3. **Equal Employment Opportunity.** Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of “federally assisted construction contract” in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, “Equal Employment Opportunity” (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, “Amending Executive Order 11246 relating to Equal Employment Opportunity,” and implementing regulations at 41 CFR Part 60, “Office of federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor.”
- 4.4. **Davis-Bacon Act,** as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, “Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction”). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland “Anti-Kickback” Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, “Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

- 4.5. **Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708).** Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.
- 4.6. **Rights to Inventions Made Under a Contract or Agreement.** If the Federal award meets the definition of “funding agreement” under 37 CFR § 401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency.
- 4.7. **Clean Air Act (42 U.S.C. 7401-7671q.) and the federal Water Pollution Control Act (33 U.S.C. 1251-1387),** as amended - Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).
- 4.8. **Debarment and Suspension (Executive Orders 12549 and 12689)** - A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), “Debarment and Suspension.” SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

- 4.9. **Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)** - Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.
- 4.10. **Prohibition on certain telecommunications and video surveillance services or equipment §2 CFR 200.216**
- 4.10.1. Recipients and sub recipients are prohibited from obligating or expending loan or grant funds to:
- 4.10.1.1. Procure or obtain;
 - 4.10.1.2. Extend or renew a contract to procure or obtain; or
 - 4.10.1.3. Enter into a contract (or extend a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).
- 4.11. **Contracts with small and minority businesses, women’s business enterprises, and labor surplus area firms. (2 CFR §200.321).** The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.
- 4.12. **Domestic preferences for procurements. (2 CFR §200.322)** As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.
- 4.13. **Procurement of recovered materials. (2 CFR §200.323)** A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and

Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

5. TERMINATION FOR CONVENIENCE OF THE GOVERNMENT

- 5.1. Pursuant to §4.2 of these Federal Provisions, the State of Colorado may terminate this contract, in whole or in part, when it is in the Government's interest. Solicitations and contracts shall include clauses as required by FAR 49.502 (2023). Termination for convenience of the government shall comply with the following provisions of the Federal Acquisition Regulations:
 - 5.1.1. For Fixed Price Contracts: FAR 52.249-2 (2023)
 - 5.1.2. For Contracts for Personal Services: FAR 52.249-12 (2023)
 - 5.1.3. For Construction Contracts for Dismantling, Demolition, or Removal of Improvements: FAR 52.249-3 (2023)
 - 5.1.4. For Educational and Other Nonprofit Institutions: FAR 52.249-5 (2023)

6. EVENT OF DEFAULT.

- 6.1. Failure to comply with these Federal Provisions shall constitute an event of default under the Contract and the State of Colorado may terminate the Contract upon 30 days prior written notice if the default remains uncured five calendar days following the termination of the 30 day notice period. This remedy will be in addition to any other remedy available to the State of Colorado under the Contract, at law or in equity.



February 10, 2026

To Whom it May Concern,

I am writing on behalf of the Department of Human Services in Moffat County in support of Northwest Colorado Health's application for the SafeCare® Colorado program. Our county's Department of Human Services has an established relationship with Northwest Colorado Health and supports the continuation of SafeCare® services in our community.

SafeCare® plays an important role in supporting families facing barriers to stability and safety and aligns with our shared commitment to strengthening families and connecting them to appropriate resources. This evidence-based program provides meaningful support to caregivers and children and contributes to improved outcomes across the community.

Northwest Colorado Health is a long-standing and trusted organization with a strong history of delivering high-quality SafeCare® services to families most in need. Based on our experience of our departments working together, we are confident this partnership will continue to be effective and responsive to community needs.

On behalf of Moffat County and the Moffat County Department of Human Services, we commit to continued collaboration with Northwest Colorado Health, including providing referrals to the SafeCare® Colorado program as appropriate.

Sincerely,

Moffat County Commissioner, Chair

Summary of Stormwater Renewal Permits – Moffat County Sand & Gravel Pits for the
Colorado Department of Public Health & Environment -2025

Big Burn Pit #17

Brown's Park #1

Cross Mtn. Ranch Pit

Limestone Pit #10

Little Snake Pit #26

Lyons Pit #2

Mantle Pit #3

Powderwash Pit #66

Smith Pit #20

State Pit #38

Sweeney Pit #30

Tuttle Pit #1

Villard Pit #2



COLORADO

Department of Public Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

COG500000 Annual Report Form Sand and Gravel Mining and Processing Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY

Reviewer: _____

Further Review: Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1901</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667

 City: Craig State: CO Zip: 81626

Part D: Facility Information
 Facility Name: Big Burn Pit No. 17
 Facility Address: 12801 CR 10N

 City: Maybell, Moffat County, Colorado 81640
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	<input type="checkbox"/>	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	<input type="checkbox"/>
--	--------------------------	---	-------------------------------------	---	--------------------------

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

<u>3/25/2025</u>	<u>9/30/2025</u>	<u>10/30/2025</u>

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.

Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



COLORADO

Department of Public Health & Environment

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COG500000 Annual Report Form Sand and Gravel Mining and Processing Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY	
Reviewer: _____	
Further Review: Yes No	

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1896</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667

 City: Craig State: CO Zip: 81626
Part D: Facility Information
 Facility Name: Brown's Park Pit No. 1
 Facility Address: 5000 Highway 318

 City: Maybell, Moffat County, Colorado 81640
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net
Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)		Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	X	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	
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 Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/27/2025	9/30/2025	10/30/2025

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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FOR INTERNAL USE ONLY	
Reviewer: _____	
Further Review: Yes No	

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1898</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667

 City: Craig State: CO Zip: 81626
Part D: Facility Information
 Facility Name: Cross Mountain Ranch Pit
 Facility Address: 25801 CR 10

 City: Maybell, Moffat County, Colorado 81640
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net
Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)		Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	X	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	
--	--	---	----------	---	--

 Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	9/30/2025	

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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FOR INTERNAL USE ONLY	
Reviewer: _____	
Further Review: Yes No	

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>2063</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667
 City: Craig State: CO Zip: 81626

Part D: Facility Information
 Facility Name: Limestone Pit No. 10
 Facility Address: 27250 CR 10
 City: Maybell, Moffat County, Colorado 81640
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
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Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

<u>3/26/2025</u>	<u>9/30/2025</u>	<u>10/30/2025</u>
<u>12/15/2025</u>		

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

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Reviewer:	_____
Further Review:	Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1887</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Little Snake Pit No. 26

Facility Address: 7500 CR 26

City: Maybell, Moffat County, Colorado 81640

Facility Contact Name: Dan Miller

Title: Director

Telephone No: (970) 824-3211 Ext. 1015

Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	X	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)		Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
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Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	6/10/2025	9/30/2025
11/3/2025		

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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COG500000 Annual Report Form
Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY	
Reviewer:	_____
Further Review:	Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1899</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Lyons Pit No. 2

Facility Address: 6001 HWY 394

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller

Title: Director

Telephone No: (970) 824-3211 Ext. 1015

Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	<input type="checkbox"/>	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>
		Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	<input type="checkbox"/>

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	9/30/2025	10/30/2025

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY	
Reviewer:	_____
Further Review:	Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1885</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Mantle Pit # 3

Facility Address: 24550 CR 16

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller

Title: Director

Telephone No: (970) 824-3211 Ext. 1015

Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	<input type="checkbox"/>	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	<input type="checkbox"/>
---	--------------------------	--	-------------------------------------	--	--------------------------

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025		

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

The property that this pit is on was sold. The new property owner has locked us out and will not let us in for inspections, We were only able to do 1 inspection at this sight. The County Attorney is in contact with the owner.

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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Department of Public Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

COG500000 Annual Report Form Sand and Gravel Mining and Processing Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY	
Reviewer:	_____
Further Review:	Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1962</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667

 City: Craig State: CO Zip: 81626

Part D: Facility Information
 Facility Name: Powderwash pit No. 66
 Facility Address: CR 66 and CR66B

 City: Craig, Moffat County, Colorado 81625
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	X	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
---	--	----------	--

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

<u>3/26/2025</u>	<u>9/30/2025</u>	<u>10/30/2025</u>

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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Applicable to Stormwater-only discharges

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Reviewer: _____

Further Review: Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 ¹⁸⁸⁶	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Smith Pit No. 20

Facility Address: 13901 CR 4

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	<input type="checkbox"/>	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>
		Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	<input type="checkbox"/>

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	9/30/2025	10/30/2025

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

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Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



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COG500000 Annual Report Form
Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

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FOR INTERNAL USE ONLY	
Reviewer:	_____
Further Review:	Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1961</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: State Pit No. 38

Facility Address: 21361 CR 4

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	<input type="checkbox"/>	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	<input checked="" type="checkbox"/>	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)	<input type="checkbox"/>
--	--------------------------	---	-------------------------------------	---	--------------------------

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	9/30/2025	10/30/2025

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):		
Part H: Required Certification Signature [Reg 61.4(1)(h)] "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."		
Name: Melody Villard	Title: BOCC Chair	
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>	



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COG500000 Annual Report Form
Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

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FOR INTERNAL USE ONLY

Reviewer: _____

Further Review: Yes No

Part A: Permit Identification	Part B: Reporting Period Jan 1 through Dec 31
General Permit Number: COG500000	(Check one. Report due by February 28 of the following year.)
Facility Certification Number COG50 <u>1900</u>	2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Sweeney Pit No. 30

Facility Address: 12221 CR 17

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller

Title: Director

Telephone No: (970) 824-3211 Ext. 1015

Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	X	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
--	---	----------	---

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

<u>3/26/2025</u>	<u>9/30/2025</u>	<u>10/30/2025</u>

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 21</i>



COLORADO

Department of Public Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

COG500000 Annual Report Form Sand and Gravel Mining and Processing Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY

Reviewer: _____

Further Review: Yes No

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1902</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
--	---

Part C: Permittee Information
 Organization: Moffat County
 Mailing Address: P.O. Box 667

 City: Craig State: CO Zip: 81626

Part D: Facility Information
 Facility Name: Tuttle Pit No. 1
 Facility Address: 1900 CR 14

 City: Craig, Moffat County, Colorado 81625
 Facility Contact Name: Dan Miller
 Title: Director
 Telephone No: (970) 824-3211 Ext. 1015
 Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections
 Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)	X	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
--	---	----------	---

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

<u>3/26/2025</u>	<u>9/30/2025</u>	<u>10/30/2025</u>

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):		
Part H: Required Certification Signature [Reg 61.4(1)(h)]		
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."		
Name: Melody Villard	Title: BOCC Chair	
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>	



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Sand and Gravel Mining and Processing
Applicable to Stormwater-only discharges

You can email the application to cdphe.wqrecordscenter@state.co.us

FOR INTERNAL USE ONLY	
Reviewer: _____	
Further Review: Yes No	

Part A: Permit Identification General Permit Number: COG500000 Facility Certification Number COG50 <u>1884</u>	Part B: Reporting Period Jan 1 through Dec 31 (Check one. Report due by February 28 of the following year.) 2024 <input type="checkbox"/> 2025 <input checked="" type="checkbox"/> 2026 <input type="checkbox"/> 2027 <input type="checkbox"/>
---	---

Part C: Permittee Information

Organization: Moffat County

Mailing Address: P.O. Box 667

City: Craig State: CO Zip: 81626

Part D: Facility Information

Facility Name: Villard Pit No. 2

Facility Address: 51600 Hwy 13

City: Craig, Moffat County, Colorado 81625

Facility Contact Name: Dan Miller

Title: Director

Telephone No: (970) 824-3211 Ext. 1015

Email Address: dmiller@moffatcounty.net

Part E: Permittee-conducted Inspections

Check the box for which inspection frequency applies to the permitted facility, Part I.J.:

Active Site - 4 inspections annually (Quarterly)		<input checked="" type="checkbox"/>	Inactive Site w/ Exposure - 6 inspections annually (Every 2 months)
	Inactive Site w/ No Exposure - 2 inspections annually (Spring/Fall)		

Provide the date(s) the inspections were conducted, as required by Part I.J of the permit:

3/26/2025	9/30/2025	10/30/2025

If an inspection(s) was not conducted in accordance with the required frequency, attach an explanation of why.



Part F: Required Monitoring (Indicate if the following monitoring is required at the permitted facility. Refer to the facility's permit certification for information on required monitoring.)	YES	NO
- Visual Monitoring (Part I.I.1) (If any of the characteristics in Part I.I.1.b are observed, attach a summary)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Benchmark Monitoring (Part I.I.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Water Quality Standards Monitoring (Part I.I.3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Additional Monitoring Required by Division (Part I.I.4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Part G: Corrective Actions (Indicate whether any of the following conditions occurred at the permitted facility.)	YES	NO
- An unauthorized release or discharge observed (e.g., spill, leak, discharge of non-stormwater not authorized under COG500000 or another permit);	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Facility control measures are not stringent enough for the discharge to meet applicable water quality standards;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Modifications to the facility control measures are necessary to meet the practice-based effluent limits in this permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The permittee finds in a facility inspection, that facility control measures are not properly selected, designed, installed, operated or maintained.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged;	<input type="checkbox"/>	<input checked="" type="checkbox"/>
- The average of quarterly sampling results as described in Part I.I.2.e of this permit exceeds an applicable benchmark.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer to any of the above is "YES," provide a description of the conditions that met the criterion/criteria and describe the corrective action(s) taken (attach additional pages as needed):

Part H: Required Certification Signature [Reg 61.4(1)(h)]
 "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name: Melody Villard	Title: BOCC Chair
Signature: <i>Melody Villard</i>	Date signed: <i>19 Feb 26</i>



February 24, 2026

Sent via electronic mail: crbpost2026@usbr.gov

U.S. Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006

RE: Draft EIS Comments regarding Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Dear Acting Commissioner Cameron:

Please accept the comments of Moffat County, Colorado, Board of County Commissioners in response to Reclamation's Draft Environmental Impact Statement (DEIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

Like many Upper Basin communities and water users, we seek operational guidelines that restore system balance and provide long-term security for water users across the basin. Unfortunately, the 2007 Interim Operating Guidelines and subsequent emergency actions perpetuated structural imbalances and overuse instead of promoting lasting stability. Given climate-driven aridification and declining average flows, bold but lawful structural reforms are now required.

We believe that necessary reforms must be implemented in a manner consistent with the 1922 Colorado River Compact, the 1948 Upper Colorado River Basin Compact, and the broader Law of the River.

With this belief in mind, we support and agree with the Colorado River Water Conservation District's comments and specific recommendations. We strongly ask that you incorporate their suggestions for further analysis and revisions during the development of the Final EIS.

Additionally, we'd like to emphasize the following points that are essential to the development of operating guidelines that achieve a long-term balance between supply and demand across the Colorado River Basin.

February 24, 2026

Page 2

Reclamation Must Prioritize Hydrologic Reality Over Predictability: The DEIS places undue emphasis on “predictability” for water users in the lower basin. Predictability cannot be achieved under future hydrologic conditions unless demands are permanently adjusted to align with reduced supply.

Flows in the Colorado River have declined approximately 20% over the past two decades and reservoir elevations remain critically low. The DEIS’ focus on predictability disproportionately favors Lower Basin users who rely on reservoir releases, while Upper Basin communities live with hydrologic variability and limited storage buffering.

Moffat County, Colorado Additional Comment: The 20-year average consumptive use in the upper basin is 4.3 million acre-feet. During years where the natural hydrology is below the 20-year average, any requirements that the EIS places on the upper basin matching lower basin conservation amounts, shall first apply a credit to the upper basin in the amount of volume that is below the 20-year average. This requirement prevents the upper basin from delivering water that is not in the system and recognizes the “natural curtailment” that occurs in the upper basin in low water years.

The proposed federal action must focus on restoring long-term structural balance across the basin and performing under all ranges of hydrology, including critically dry conditions.

The Final EIS Must Evaluate and Adjust the Scale of Upper Basin Conservation: Several alternatives rely on assumed Upper Basin conservation volumes of up to 500,000 acre-feet annually. However, the DEIS does not analyze the reasonably foreseeable environmental and socioeconomic impacts required to achieve conservation at that scale.

In Upper Basin communities, conservation at these levels would likely require significant and sustained reductions in irrigated acreage and municipal uses and decreased economic activity.

Such reductions would have direct and potentially permanent impacts on:

- Agricultural economies and employment
- Rural tax bases and county revenues
- Habitat for aquatic and terrestrial species
- Community stability and small business viability
- **Moffat County Commissioners are concerned that Upper Basin Conservation volumes of up to 500,000 acre-feet will have substantial agricultural impacts. Costly impacts to hay fields and return flows should be evaluated especially if water leases were to occur in consecutive years. Therefore, Moffat County requests the Bureau of Reclamation analyze limits on conservation leasing to no more than three years in a 10-year period with the same acre NOT being fallowed in consecutive years.**

February 24, 2026

Page 3

These impacts must be analyzed programmatically and cumulatively under NEPA. Furthermore, the modeled conservation volumes exceed demonstrated program performance to date. The Final EIS should evaluate how alternative outcomes are impacted utilizing real world conservation program amounts.

Upper Basin Shortages Must Be Explicitly Disclosed: The DEIS repeatedly quantifies Lower Basin shortages in the main body of the document while relegating Upper Basin shortages to Appendix I.

Failure to clearly disclose these shortages in the main body of the EIS creates a misleading narrative regarding risk distribution across basins.

Lower Basin Water Use Must Account for System Losses: Approximately 1.5 million acre-feet annually represents system losses, including evaporation and transit losses. These losses are an integral part of Lower Basin consumptive use and should not be classified as “shortages.” Failure to account for these losses contributed to storage decline under the 2007 Interim Guidelines. No basin or contractor should be permitted to deplete water beyond legal apportionments unless Lake Powell is in full or flood-control conditions.

Lower Basin conservation water must be subject to realistic, recurring evaporation and transit loss accounting. One-time assessments are insufficient.

At Least One Alternative Must Perform Under Critically Dry Hydrology and Hydrology Must Drive Post-2026 Operations: None of the DEIS alternatives perform adequately under critically dry hydrology. Given declining natural flows at Lees Ferry and current reservoir elevations, at least one alternative must achieve performance metrics at least 90% of the time under critically dry conditions.

Additionally, operating regimes based solely on comparative reservoir elevations have failed to protect storage at Lake Powell. The Draft EIS must model realistic operations and its effects instead of allowing reservoirs to drop below critical elevations. This is critical for the public to understand and evaluate impacts of likely operations given current reservoir levels and hydrologic conditions.

Moffat County Colorado requests at least one Alternative must evaluate desalinization programs being implemented along the Pacific coastline. Water produced from desalinization should offset releases from Lake Mead and result in net conservation. Hotter and dryer hydrology trends in the Colorado River Basin System does require finding additional water sources, and desalinization should be evaluated in at least one alternative.

Interbasin Transactions Must Not Be Allowed: The interstate compacts were designed to provide legal certainty and prevent interstate water marketing across basins. Interstate marketing mechanisms threaten Upper Basin water security, economic stability, and legal clarity. Colorado law also reflects a long-standing public policy limiting interstate export of waters of the state. We will not support any mechanism authorizing interstate or interbasin water marketing between the Upper and Lower Colorado River Basins.

February 24, 2026

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Alternatives Must Contain Clearly Defined and Modeled Actions: The Basic Coordination Alternative includes non-specific actions above Lake Powell (i.e. in the Upper Basin) regarding additional reductions for infrastructure protection without modeling or clearly defining those triggers. These additional and unspecified actions must be disclosed and modeled to allow decision-makers and the public an opportunity to fully understand and assess the impact of these actions.

Similarly, the Supply Driven Alternative includes undefined “Gap Water,” with modeling assumptions that do not exclude Lower Basin system losses. The concept of “Gap Water” must be fully defined with disclosure on how often it is introduced to the system and the range of its magnitude.

Upper Basin Conservation Water and CRSP Upper Initial Units Water Must Remain in Lake Powell: If Upper Basin conservation is included, conserved water must be operationally neutral with respect to Lake Powell releases and Lower Basin shortage determinations. Conserved water should only be released at the direction of the Upper Colorado River Commission for Compact compliance or meaningful reservoir recovery.

Releases from CRSP Upper Initial Units for infrastructure protection must remain operationally neutral and remain in Lake Powell until sufficient system recovery occurs. Repeated modeled releases raise feasibility and NEPA concerns that must be analyzed.

In conclusion, Upper Basin communities bear hydrologic variability at the source of the Colorado River system. Our economies, agricultural base, infrastructure, and public services depend on legally consistent and hydrologically realistic operations.

We respectfully urge Reclamation to revise the DEIS to:

- Restore structural supply-demand balance;
- Fully analyze Upper Basin conservation impacts;
- Properly account for Lower Basin system losses;
- Ensure transparency in modeling;
- Include alternatives that perform under critically dry hydrology; and
- Honor the compacts and federal law.
- Eliminate using 2-year averaging (used currently) to predict flows into Powell and Mead to something more reliable that produces numbers that can be adjusted quickly to adapt to different flow scenarios as they unfold.

Thank you for your full and fair consideration of these comments.

Sincerely,

Melody Villard, Chair
Moffat County Commissioner

Tony Bohrer, District 1
Moffat County Commissioner

Donald Broom, District 3
Moffat County Commissioner

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