

HB17-1285

REFINANCE WATER POLLUTION CONTROL PROGRAM ACT
ANNUAL REPORT
TO THE LEGISLATURE

2021

MARCH 2021



Foreword

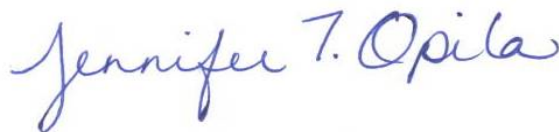
I am pleased to submit the HB17-1285 - Refinance Water Pollution Control Program Act for the report period coinciding with federal fiscal year 19-20 (10/2019-9/2020). The legislation has specific requirements for the annual report including:

- The number of permits processed.
- The number of applications pending for new and amended permits.
- The length of time the permits remain in the system prior to issuance.
- The number of inspections conducted.
- The number of site application and design reviews completed.
- The number of enforcement actions taken.
- The costs associated with each sector.
- The number of full-time equivalents assigned to and actively processing permits.
- The number of full-time equivalents assigned to and actively conducting inspections.
- The number of full-time equivalents assigned to and actively conducting site application and design reviews.
- The number of full-time equivalents assigned to and actively conducting enforcement actions.
- The number of full-time equivalents assigned to and actively developing rules and standards.
- The department shall inform the committees regarding all new standards and rules to be proposed within the subsequent year.

The department is required to submit an annual report on or before March 31st of each year. In 2017, the department developed baseline information for reporting. For this report and subsequent reports, the department is required to provide information on improvements that have been made in comparison to the baseline and to discuss barriers to making improvements. While not required, the division is committed to furthering environmental justice and health equity priorities through the thoughtful administration of its programs and effective community engagement. Outreach regarding this year's report is planned for May 2021.

The annual report is provided to the following committees:

- Senate [Agriculture & Natural Resources Committee](#).
- House of Representatives [Energy & Environment Committee](#).
- House of Representatives [Rural Affairs & Agriculture Committee](#).



Jennifer Opila, Director
Water Quality Control Division
Colorado Department of Public Health and Environment
March 31, 2021

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Executive Summary

The Colorado Department of Public Health and Environment's (department) Water Quality Control Division (division) implements the federal Clean Water Act and the Colorado Water Quality Control Act. These acts focus on water quality protection and the restoration of Colorado's streams, rivers, lakes, reservoirs, and groundwater. During the 2017 legislative session, the department secured funding for the Clean Water Program (program) through 2022 via HB17-1285. This bill established new fee increases (effective July 2018) as well as the mix between general and cash funds that each clean water sector (established in 2015) will receive in the future.

The following table summarizes how all reporting years compared to the baseline year for HB17-1285 reporting requirements. During the baseline or 10/2016-9/2017 reporting year, the program began to restore staffing levels based on funding provided by HB17-1285. Staffing levels for the 10/2018-9/2019 reporting year included vacancies due to attrition that is commensurate with historic rates at the division. For the 10/2019-9/2020 reporting year, vacancies were due to normal attrition, however due to the COVID-19 pandemic, the pace of hiring replacements was reduced significantly. The number of vacancies during 10/2019-9/2020 directly impacted production for inspections and permits. In addition, there was a decrease in the amount of inspections due to the COVID-19 pandemic's impact on the program's ability to conduct inspections safely. Production levels for the remaining reporting categories were similar to the baseline year's production levels as anticipated. The division has renewed hiring and hopes that staffing levels can be restored to previous levels by the end of this reporting year. In addition, the division hopes to be able to resume pre-pandemic inspection practices by the end of this reporting year. Therefore, it will likely take until the 10/2021-9/2022 reporting year to restore inspection and permit production to pre-pandemic levels. This will likely result in an eventual increase in permit backlog.

Comparison of HB17-1285 requirements for all reporting years compared to the baseline year

Reporting Category	10/2017-9/2018 compared to baseline year	10/2018-9/2019 compared to baseline year	10/2019-9/2020 compared to baseline year
Program staffing levels	↑	↑	↔
Standards development	↔	↔	↔
Permit production	↑	↑	↑
Permit timeliness	↔	↑	↑
Engineering reviews production	↔	↔	↔
Inspection production	↔	↔	↓
Enforcement actions	↔	↔	↔

Program staffing levels: The program has completed hiring related to HB17-1285, consistent with the legislative intent of HB17-1285, which states that "the department's use of funding provided in this act should be limited to processing permits, providing technical and compliance assistance, processing site application and design reviews, and maintaining stakeholder involvement for all aspects of the clean water program." For the 10/2019-9/2020

reporting year, vacancies were due to normal attrition, however due to the COVID-19 pandemic, the pace of hiring replacements was reduced significantly. The number of vacancies during 10/2019-9/2020 directly impacted production for inspections and permits.

Standards: The program is responsible for developing the science used by the Water Quality Control Commission (commission) to help establish water quality goals or "standards." The commission sets statewide water quality standards to protect Colorado's water for uses such as drinking water, agricultural uses, recreational uses like swimming and boating, and for aquatic life. The federal Clean Water Act and the Colorado Water Quality Control Act allow statewide standards to be modified based on site-specific factors. Program staff support the commission for all standards hearings. The level of standards development has been consistent throughout reporting years.

Permits: The federal Clean Water Act and the Colorado Water Quality Control Act prohibit the discharge of pollutants to state waters unless certain conditions are met. The program works to issue and manage permits for entities requesting to discharge pollutants to waters of the state. For this reporting year there was a slight increase in permit production and timeliness compared to the baseline year. Production levels and timeliness were impacted by the COVID-19 pandemic and vacancies in the Permits Section.

Engineering: The program provides engineering review, compliance assistance, and technical assistance for domestic wastewater treatment facilities. This is achieved through area-wide wastewater facility planning, facility site approval, engineering plan review, compliance assistance, and comprehensive performance evaluation and construction inspections for facilities funded through the State Revolving Fund Program. The amount of site approvals and design reviews completed is consistent across reporting years.

Inspections: Field inspections are a key component of the program's compliance assurance efforts. The program is responsible for conducting inspections of facilities subject to the federal Clean Water Act and Colorado Water Quality Control Act requirements. The number of inspections completed has been consistent throughout all reporting years. Due to funding constraints, the number of inspections completed for the program sectors for commerce and industry and municipal separate storm sewers did not meet Environmental Protection Agency national targets. In addition, there was a decrease in the amount of inspections due to the COVID-19 pandemic's impact on the program's ability to conduct inspections safely and, as discussed previously, the pace of hiring vacant positions also decreased during 10/2019-9/2020 due to the COVID-19 pandemic.

Enforcement: The program is responsible for ensuring that the regulated community complies with the requirements of the Colorado Water Quality Control Act and its implementing regulations. Enforcement efforts can be placed into three broad categories: compliance assistance, informal compliance assurance, and formal enforcement activities. The number of enforcement actions has been similar throughout all reporting years.

Program finances: The Colorado General Assembly Joint Budget Committee requires the program to report costs associated with the clean water sectors on a quarterly basis. This cost information includes the total costs of the program including personnel services, administrative services, benefits, and indirect costs. This reporting was the basis for HB17-1285 and should provide the basis for future fee bills. Appendix A provides this financial information for state fiscal year 2019-20 and for the first two quarters of state fiscal year 2020-21. Program finances are on track with the spending plan that was established with the passage of HB17-1285.

Recommendations: For the next reporting year, the division will continue to track the information required by HB17-1285 outlined in this report, develop this report, and document quality improvement efforts.

Section 1 Overview of Clean Water Program

The Colorado Department of Public Health and Environment's (department) Water Quality Control Division (division) and Clean Water Program (program) implement the federal Clean Water Act and the Colorado Water Quality Control Act. These acts focus on water quality protection and the restoration of Colorado's streams, rivers, lakes, reservoirs, and groundwater. In addition, the Colorado Water Quality Control Act focuses on the protection of human health associated with the use of reclaimed domestic wastewater and graywater. The program regulates the discharge of pollutants to state waters for more than 7,000 entities. Examples of regulated entities include commercial and industrial facilities, mines, construction sites, municipal areas, and domestic wastewater treatment facilities. In addition to regulating these "point sources" of pollution, the program works with stakeholders across the state to address pollution sources that are not regulated, such as water runoff from agricultural areas, abandoned mines, and forested areas. These sources of pollution are called "nonpoint sources." The program manages the water quality of these point and nonpoint sources using a continuing planning process.

Water quality management in Colorado

There are five pillars to the continuing planning approach for water quality management: information gathering, goal setting, protection and restoration, assurance, and assistance.

Information gathering: The program gathers scientific data and information that is used to determine the health of Colorado waters. This information is used for all parts of the continuing planning process and to ensure that water quality is protected for use by people, agriculture, and aquatic life. The program also develops information on the status of Colorado's streams and lakes and about the compliance status of permittees. This information is available through Environmental Protection Agency (EPA) databases.

Goal setting: The program develops and presents scientific evidence to the Water Quality Control Commission (commission) so it can establish water quality goals to protect Colorado's water for drinking water, agricultural uses, recreational uses such as swimming and boating, and for aquatic life.

Protection and restoration: The program issues permits to entities that discharge pollution to Colorado waters. Permits issued to discharge pollutants are set to be protective of water quality goals and control regulations set by the commission. The program also identifies areas across the state that are not achieving the commission's water quality goals and develops restoration plans for these waters. The program reviews site location and design for wastewater infrastructure across the state. Program staff also respond to spills and other environmental releases to Colorado waters. Finally, the program certifies that federal permits and licenses are protective of Colorado's water quality goals.

Assurance: The program conducts oversight on the permits it issues. Oversight consists of onsite facility inspections and the evaluation of self-reported data required by the permit. Based on this oversight and the

Information gathering

Goal setting

Protection and restoration

Assurance

Assistance

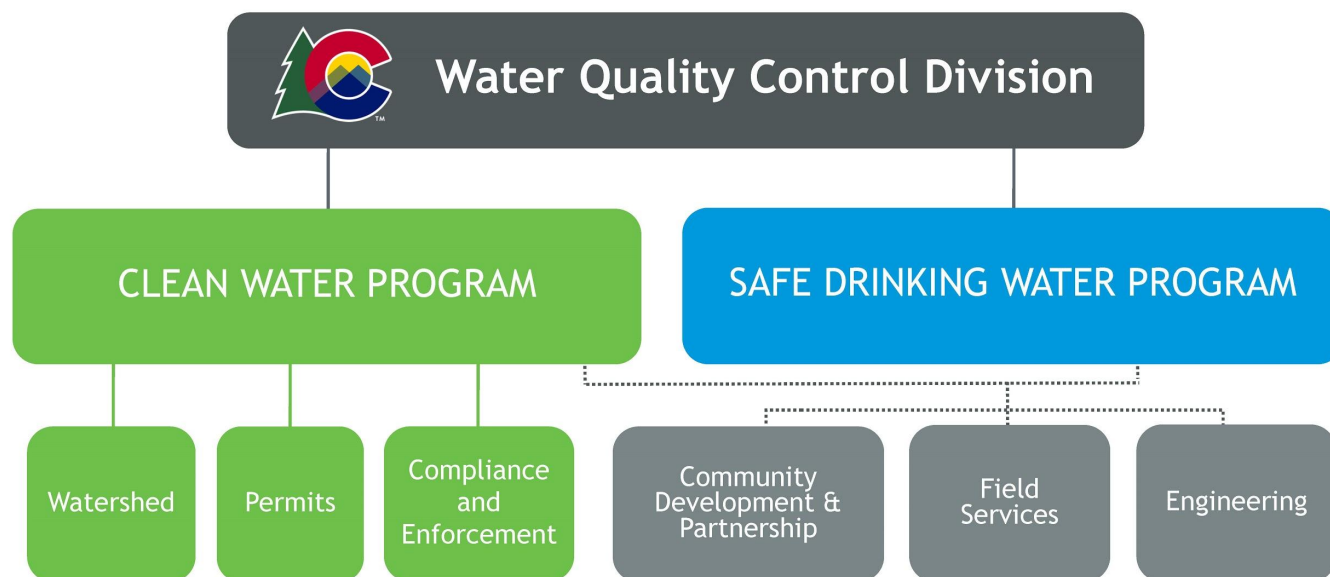
severity of noncompliance with regulations, the program can issue compliance advisories, notices of violation, cease and desist orders, and/or penalties.

Assistance: The program provides assistance for all four pillars described above. Domestic and stormwater facilities that are required to make infrastructure improvements to protect streams and lakes are eligible for subsidized financing and possibly grants. The program issues federal grants for regional water quality planning and when nonpoint sources contribute to a water body not meeting its water quality goals. To help people and entities understand and comply with regulatory requirements, the program provides compliance assistance via telephone, email, guidance documents, and trainings. In addition, the program provides technical assistance to point source and nonpoint source dischargers. This technical assistance includes information on the technical and economic feasibility of treatment options and guidance on technical aspects of the commission's water quality goal setting process.

Work areas and organization

The work to support water quality management processes is divided across multiple groups in the division, including several sections that are shared between the Clean Water and Safe Drinking Water Programs (gray in the figure below). The only shared work area without a standalone summary section in this report is the Community Development and Partnership Section. This section works with regulated entities to provide funding to implement water pollution control infrastructure projects to meet the goals of the federal Clean Water Act and the Colorado Water Quality Control Act.

Figure 1 Organization chart for the Water Quality Control Division highlighting Clean Water Program work areas



Section 2 Baseline year and reporting period

The established baseline will be important for measuring the program's success moving forward. Thus, a baseline year of October 1, 2016 through September 30, 2017 was established during the first HB17-1285 report, submitted in March 2018. This baseline was selected because the program develops work plans based on the federal fiscal year, which runs from October through September. In addition, this timeframe was indicative of the program's resources as it began to restore staffing levels based on funding provided by HB17-1285, which is important for comparing results from this reporting year and future years' results.

Section 3 Staffing summary

HB17-1285 requires that the program summarize:

- The number of full-time equivalents assigned to and actively processing permits.
- The number of full-time equivalents assigned to and actively conducting inspections.
- The number of full-time equivalents assigned to and actively conducting site application and design reviews.
- The number of full-time equivalents assigned to and actively conducting enforcement actions.
- The number of full-time equivalents assigned to and actively developing rules and standards.

Table 1 below summarizes these reporting requirements by permitting sector. The permitting sectors include commerce and industry, construction, municipal separate storm sewer systems (MS4), pesticides, and public and private utilities. Staffing levels were fairly consistent between the sectors when comparing the baseline year and the 10/2017-9/2018 reporting except for the commerce and industry sector, MS4 sector, and public and private utilities sector. These sectors received funding as part of HB17-1285 to maintain program services. The program held vacancies prior to the passage of HB17-1285 but began to fill these vacancies prior to the 10/2017-9/2018 reporting year. The program completed hiring from HB17-1285. Staffing levels for the 10/2018-9/2019 reporting year included vacancies due to attrition that is commensurate with historic rates at the division. For the 10/2019-9/2020 reporting year, vacancies were due to normal attrition, however due to the COVID-19 pandemic, the pace of hiring replacements was reduced significantly. The number of vacancies during 10/2019-9/2020 directly impacted production for inspections and permits. Finally, HB17-1285's legislative declaration stated that "the department's use of funding provided in this act should be limited to processing permits, providing technical and compliance assistance, processing site application and design reviews, and maintaining stakeholder involvement for all aspects of the clean water program." Table 1 shows that the increase in staffing levels is consistent with the legislative declaration.

Table 1 Summary of full-time equivalents for HB17-1285 reporting requirements and permitting sector

Reporting year	Enforcement	Engineering	Inspections	Permits	Standards	Total
Commerce and Industry						
10/2016-9/2017	1.5	0.1	2	5.3	2.4	11.3
10/2017-9/2018	1.8	0.0	1.7	5.7	3.0	12.2
10/2018-9/2019	1.4	0.0	1.5	4.0	3.5	10.4
10/2019-9/2020	1.9	0.1	1.5	4.3	2.2	10.0
Construction						
10/2016-9/2017	1.9	0.0	8.8	2.3	0.0	13.0
10/2017-9/2018	1.3	0.0	8.6	2.5	0.0	12.4
10/2018-9/2019	2.2	0.0	8.1	2.2	0.0	12.5
10/2019-9/2020	1.5	0.0	7.4	2.9	0.1	11.9
Municipal Separate Storm Sewer Systems						
10/2016-9/2017	0.0	0.0	0.2	0.3	0.0	0.5

10/2017-9/2018	0.0	0.0	0.1	0.8	0.0	0.9
10/2018-9/2019	0.0	0.0	0.1	1.0	0.0	1.1
10/2019-9/2020	0.0	0.0	0.1	1.0	0.0	1.1
Pesticides						
10/2016-9/2017	0.0	0.0	0.7	0.0	0.0	0.7
10/2017-9/2018	0.0	0.0	1.0	0.0	0.0	1.0
10/2018-9/2019	0.0	0.0	1.0	0.0	0.0	1.0
10/2019-9/2020	0.0	0.0	1.0	0.0	0.0	1.0
Public and Private Utilities						
10/2016-9/2017	2.6	3.8	2.9	3.1	3.6	16.0
10/2017-9/2018	2.9	3.9	3.2	6.0	3.0	19.0
10/2018-9/2019	2.4	3.9	3.9	6.8	2.5	19.5
10/2019-9/2020	2.3	3.7	2.8	6.0	3.7	18.6
Total						
10/2016-9/2017	6.0	3.9	14.6	11.0	6.0	41.5
10/2017-9/2018	6.0	3.9	14.6	15.0	6.0	45.5
10/2018-9/2019	6.0	3.9	14.6	14.0	6.0	44.5
10/2019-9/2020	5.7	3.8	12.8	14.2	6.0	42.6

Section 4 Clean Water Program finances

The Colorado General Assembly Joint Budget Committee requires the program to report costs associated with the clean water sectors on an annual basis. This cost information includes the total costs of the program including personnel services, administrative services, benefits, and indirect costs. This reporting was the basis for HB17-1285 and should provide the basis for future fee bills. Appendix A provides this financial information for state fiscal year 2019-20 and for the first two quarters of state fiscal year 2020-21. For state fiscal year 2019-20, the program spent less than its budget. For 2020-21, the program is on target for expenditures to be in line with budget. For the first few years after HB17-1285's passage, cash revenue was anticipated to exceed cash expenditures, as the fee increases included in the bill were intended to fund the program for five years. Since expenditures would be less than revenue, the program would need to spend down cash reserves developed during the first few years after the bill was passed.

Section 5 Goal setting: Standards

The Watershed Section works with partners to develop scientific and technological information to help improve, restore, and protect the quality of surface water and groundwater throughout the state. This is achieved through monitoring and assessment that identifies impaired waters that require restoration. The Watershed Section is

responsible for developing the science utilized by the commission to help establish water quality goals, or “standards.” The commission sets water quality standards to protect Colorado’s water for uses such as drinking water, agricultural uses, recreational uses like swimming and boating, and for aquatic life. In addition, the section provides planning, technical, and financial support focused on restoration and protection. The section also certifies that federal permits and licenses (i.e. water supply projects) comply with state water quality requirements.

5.1 Comparison of Colorado and EPA water quality criteria

Water quality standards typically are expressed numerically. The commission establishes numeric water quality criteria to protect classified uses including:

- Aquatic life — fish, aquatic invertebrates (e.g., insects, snails), and amphibians.
- Recreation — swimming, boating, wading, and water play.
- Agriculture — irrigation and livestock watering.
- Domestic water supply — drinking water supplies.

To establish Colorado criteria, the commission typically examines EPA criteria to determine if they should be modified to reflect conditions in Colorado. Table 2 compares Colorado’s and EPA’s criteria. For reporting years ending 9/2017 through 9/2019, there were no changes between reporting years. There were slight changes in the 10/2019-9/2020 reporting year due to the commission’s December 2019 adoption of EPA’s cadmium criteria for aquatic life, April 2020 adoption of a new hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX) water supply criterion (less stringent than EPA), and April 2020 update of the chrysene aquatic life and domestic water supply combination criterion (less stringent than EPA).

Table 2 Comparison of Colorado’s and EPA’s water quality criteria

Classified Use	Number of Colorado criteria that are the <u>same</u> as EPA criteria	Number of Colorado criteria that are <u>more stringent</u> than EPA criteria	Number of Colorado criteria that are <u>less stringent</u> than EPA criteria	Total
Aquatic Life				
As of 9/30/2017	35 (74%)	4 (9%)	8 (17%)	47
As of 9/30/2018	35 (74%)	4 (9%)	8 (17%)	47
As of 9/30/2019	35 (74%)	4 (9%)	8 (17%)	47
As of 9/30/2020	36 (77%)	3 (6%)	8 (17%)	47
Recreation				
As of 9/30/2017	0 (0%)	0 (0%)	1 (100%)	1
As of 9/30/2018	0 (0%)	0 (0%)	1 (100%)	1
As of 9/30/2019	0 (0%)	0 (0%)	1 (100%)	1
As of 9/30/2020	0 (0%)	0 (0%)	1 (100%)	1
Agriculture				
As of 9/30/2017	21 (91%)	1 (4%)	1 (4%)	23

As of 9/30/2018	21 (91%)	1 (4%)	1 (4%)	23
As of 9/30/2019	21 (91%)	1 (4%)	1 (4%)	23
As of 9/30/2020	21 (91%)	1 (4%)	1 (4%)	23
Domestic Water Supply				
As of 9/30/2017	79 (91%)	6 (7%)	1 (2%)	86
As of 9/30/2018	79 (91%)	6 (7%)	1 (2%)	86
As of 9/30/2019	79 (91%)	6 (7%)	1 (2%)	86
As of 9/30/2020	79 (91%)	6 (7%)	2 (2%)	87
Aquatic Life and Domestic Water Supply Combination				
As of 9/30/2017	13 (13%)	31 (32%)	54 (55%)	98
As of 9/30/2018	13 (13%)	31 (32%)	54 (55%)	98
As of 9/30/2019	13 (13%)	31 (32%)	54 (55%)	98
As of 9/30/2020	13 (13%)	30 (31%)	55 (56%)	98

Aquatic life

For aquatic life, Table 2 shows that Colorado has three criteria more stringent than EPA criteria. For these criteria (cyanide, silver, and aldrin) the commission does not plan to revise the criteria to match EPA's. The Colorado criteria are close to the same magnitude as EPA's criteria, and regulated entities are not facing compliance issues with these criteria. The commission adopted cadmium aquatic life criteria consistent with EPA's criteria in December 2019.

Table 2 shows that Colorado has eight aquatic life criteria less stringent than EPA criteria. For five of these criteria (nitrogen, phosphorus, chlorophyll 'a', ammonia, and selenium), the program has developed a 10-year plan for coordinating with stakeholders on new criteria. EPA has published revised federal criteria for ammonia (2013) and selenium (2016) that reflect the latest science regarding these constituents and aquatic life protection. Colorado has not yet adopted these federal criteria. Colorado is proposing to update its aquatic life criteria for acrolein during the June 2021 Regulation No. 31 rulemaking hearing; if adopted, Colorado's criteria will be the same as EPA's. Colorado did adopt criteria for nitrogen, phosphorus, and chlorophyll 'a'. However, EPA did not approve them and recommended suggestions for improvement that will take additional effort. The program does not have plans to recommend criteria revisions to the commission for aluminum or zinc.

Recreation

EPA's E. coli criteria are generally more stringent and complex than Colorado's criteria. However, the criterion applied to most Colorado water bodies (which have existing primary contact recreation) is the same as EPA's criterion, as shown in Table 2.

Agriculture

Colorado's criteria are mostly the same as EPA's. Colorado has one criterion that is more stringent than EPA's (pH) and one criterion that is less stringent (molybdenum), as shown in Table 2. The program does not have plans to recommend revised criteria to the commission for these compounds. However, an external party is gathering

scientific information on the molybdenum standard that may be used to suggest revisions to the criteria in the future.

Domestic water supply

Colorado has six criteria more stringent than EPA's (barium, copper, fluoride, picloram, silver, total coliforms). The program does not recommend the commission focus on revising these criteria as the Colorado criteria are similar in magnitude to EPA's, and regulated entities are not facing compliance issues with these criteria. In April 2020, Colorado adopted a new hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX) water supply criterion that is less stringent than EPA's.

Aquatic life and domestic water supply combination

The commission adopted a number of criteria that apply to both domestic water supply and aquatic life consumed by humans (i.e., water + fish and fish ingestion). These are considered together because they use similar toxicological information based on human consumption of pollutants. EPA updated these criteria in 2015 to reflect that Americans, on average, drink more water and weigh more than when the criteria were originally developed. The program plans to present evidence to the commission in 2021 to revise the criteria to be consistent with EPA's criteria. Additionally, in April 2020, Colorado updated its chrysene aquatic life and domestic water supply combination criterion; it is now less stringent than EPA.

5.2 Standards modified based on site-specific factors

The federal Clean Water Act and the Colorado Water Quality Control Act allow statewide standards to be modified based on site-specific factors. Standards that are modified on a site-specific basis are summarized in the commission's Regulations 32 through 38 (5 CCR 1002-32 through 5 CCR 1002-38). Standards modified on a site-specific basis are typically less stringent than the statewide standards. When these standards are used in permits, they provide regulatory flexibility. Modifying standards on a site-specific basis generally helps resolve an existing or predicted compliance issue.

There are multiple site-specific tools that can be used to modify a statewide standard. All of these tools require staff time to evaluate site-specific information, examine the condition of the classified use the standard is meant to protect, and work with stakeholders to formulate recommendations to the commission. Colorado is a national leader in developing site-specific standards that are still protective of classified uses.

In Colorado, there are three major site-specific tools used to modify a statewide standard: site-specific standards, temporary modifications, and variances. Site-specific numeric standards are modifications of statewide standards based on consideration of site-specific factors such as water chemistry or aquatic life. Temporary modifications are adopted by the commission when there is uncertainty about the statewide standard and what the long-term solution or goal for a given site may be moving forward. Variances recognize specific solutions for point sources where it is not feasible to achieve the statewide standard. Table 3 shows the relative breakout of standards tools that have been adopted in segments for the major river basins across the state. Arsenic temporary modifications are shown separately in Table 3 due to the adoption of a statewide temporary modification for arsenic in 2013. Temperature site-specific standards are included by themselves in Table 3 because site-specific temperature standards have been a review element of focus for the commission in recent rulemaking hearings. Except for non-arsenic temporary modifications, the number of temporary modifications, variances and site-specific standards has been consistent throughout the reporting years. The commission and division have been working to decrease the number of non-arsenic temporary modifications and this effort is reflected in the Table 3 results. The number of site-specific standards decreased in 2020 as a result of the commission's December 2019 adoption of updated cadmium table value standards, which replaced many site-specific cadmium standards (Table 3).

Table 3 Number of temporary modifications, variances and site-specific standards across the state

Temporary Modifications	Variances	Site-Specific Standards
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	Non-Arsenic Temporary Modifications	Arsenic Temporary Modifications	Variances	Temperature Site-Specific Standards	Non- Temperature Site-Specific Standards
Arkansas					
As of 9/30/2017	35	53	1	10	77
As of 9/30/2018	33	53	3	10	85
As of 9/30/2019	4	52	3	10	85
As of 9/30/2020	1	52	3	10	77
Colorado					
As of 9/30/2017	3	64	0	14	44
As of 9/30/2018	2	67	0	15	43
As of 9/30/2019	2	64	0	17	55
As of 9/30/2020	2	64	0	17	38
Gunnison					
As of 9/30/2017	5	52	1	4	81
As of 9/30/2018	5	52	1	9	81
As of 9/30/2019	5	52	1	9	81
As of 9/30/2020	5	52	1	9	33
Rio Grande					
As of 9/30/2017	10	28	0	4	60
As of 9/30/2018	2	31	0	6	68
As of 9/30/2019	0	31	0	6	68
As of 9/30/2020	0	31	0	6	52
San Juan					
As of 9/30/2017	4	60	1	11	46
As of 9/30/2018	4	60	1	13	46
As of 9/30/2019	4	60	1	13	46
As of 9/30/2020	4	60	1	13	33

South Platte					
As of 9/30/2017	55	93	1	19	89
As of 9/30/2018	53	99	1	19	94
As of 9/30/2019	42	97	1	19	94
As of 9/30/2020	7	118	1	15	88
Yampa/White					
As of 9/30/2017	7	34	0	7	14
As of 9/30/2018	9	35	0	7	12
As of 9/30/2019	10	37	0	7	10
As of 9/30/2020	10	37	0	7	10
Statewide					
As of 9/30/2017	119	384	4	69	411
As of 9/30/2018	108	397	6	79	429
As of 9/30/2019	67	393	6	81	439
As of 9/30/2020	29	414	6	77	331

The commission has established river segments across the state, and each segment has standards applied to it based on each segment's classified uses. Table 4 summarizes the number of segments with temporary modifications, variances and site-specific standards by major river basin. The number of these actions has been fairly consistent for all reporting years. Across the state and for the 10/2019-9/2020 reporting year, 40 percent of stream segments have temporary modifications, less than one percent have variances, and 20 percent of stream segments have site-specific standards.

Table 4 Number of segments with temporary modifications, variances, and site-specific standards across the state

Basin	No. of Segments	Temporary Modifications	Variances	Site-Specific Standards
Arkansas				
As of 9/30/2017	150	56	1	37
As of 9/30/2018	156	56	2	42
As of 9/30/2019	156	53	3	42
As of 9/30/2020	156	52	2	37
Colorado				

As of 9/30/2017	131	65	0	24
As of 9/30/2018	131	68	0	23
As of 9/30/2019	129	65	0	35
As of 9/30/2020	129	65	0	27
Gunnison				
As of 9/30/2017	152	52	1	44
As of 9/30/2018	152	52	1	48
As of 9/30/2019	152	52	1	48
As of 9/30/2020	152	52	1	37
Rio Grande				
As of 9/30/2017	104	29	0	20
As of 9/30/2018	107	32	0	24
As of 9/30/2019	107	31	0	24
As of 9/30/2020	107	31	0	18
San Juan				
As of 9/30/2017	169	64	1	34
As of 9/30/2018	169	64	1	35
As of 9/30/2019	169	64	1	35
As of 9/30/2020	169	64	1	32
South Platte				
As of 9/30/2017	228	105	2	46
As of 9/30/2018	233	112	2	49
As of 9/30/2019	233	106	1	49
As of 9/30/2020	230	122	2	50
Yampa/White				
As of 9/30/2017	134	39	0	14
As of 9/30/2018	134	42	0	12
As of 9/30/2019	135	44	0	14
As of 9/30/2020	135	44	0	14

Statewide				
As of 9/30/2017	1,068	410	5	219
As of 9/30/2018	1,082	426	6	233
As of 9/30/2019	1,081	415	6	247
As of 9/30/2020	1,078	430	6	215

5.3 Upcoming standards rulemakings

For the upcoming year, the Watershed Section will be working on the following standards development actions and rulemaking hearing proceedings:

- **June 2021** - Basic Standards and Methodologies for Surface Water (Regulation No. 31). The focus of this hearing will be the routine triennial review of antidegradation designations, use classifications, and standards statewide.
- **Classifications and Numeric Standards for the San Juan River and Dolores River Basins (Regulation Nos. 34 and 35)** - The focus of this hearing will be the use classifications and standards for these basins, and revisions to water supply use classifications for various segments. Site-specific standards will be reviewed and revised as appropriate.
 - Issues formulation hearing - **November 2021**.
 - Rulemaking hearing - **June 2022**.
- **December 2021** - Discharger specific variances rulemaking hearing. This is a bi-annual rulemaking hearing to consider new discharger specific variances and to review existing variances nearing expiration. The division is also working with disadvantaged communities to pursue variances where appropriate.

Section 6 Protection and restoration: Permits

The federal Clean Water Act and the Colorado Water Quality Control Act prohibit the discharge of pollutants to state waters unless those discharges will not compromise the uses of those waters. The Permits Section works to issue and manage permits for entities requesting to discharge pollutants to waters of the state. For discharges to surface water, the section processes permits as part of EPA's National Pollution Discharge Elimination System as EPA has delegated that Colorado issue these permits. For discharges to groundwater, permits are issued as part of the Colorado Discharge Permit System. Additionally, the Permits Section develops preliminary effluent limitations for planning purposes and issues reuse authorizations, authorizations for biosolids application, and authorizations for pretreatment discharges to domestic wastewater systems from industrial facilities. The section also manages data collection and storage to ensure that collected data meets internal data standards and EPA requirements.

HB17-1285 requires that the program provide information regarding permit production and timeliness. Figures 2 through 7 summarize the number of permits that were issued/reissued, modified, or administratively continued for all the reporting years. Permits have five-year terms. Issued permits are permits that are new and issued for the first time. A reissued permit has expired after its five-year term, but the permittee filed a renewal application to continue their discharge and the program has processed the renewal. A permit modification is a change to an existing permit during its term. Administratively continued permits are permits that have expired, but the program has received a renewal application at least 180 days prior to the expiration date of the permit. If the program receives a complete application but does not renew the permit prior to the expiration date, the permit is automatically administratively continued, and the permittee is still authorized to discharge under its expired permits terms and conditions. Administratively extended permits cannot be modified.

Figures 2 and 3 display the number of individual permits and general permit certifications that were issued/reissued for all of the reporting years by permitting sector the program regulates. Again, the permitting sectors include commerce and industry, construction, MS4, pesticides, and public and private utilities. An individual permit is written to reflect site-specific conditions of a single discharger based on information submitted by that discharger in a permit application and is unique to that discharger. A general permit is written to cover multiple dischargers with similar operations and types of discharges based on the permit writer's professional knowledge of those types of activities and discharges. Figure 2 shows that the number of individual permits that were issued/reissued has increased significantly over time. However, due to vacancies in the Permit Section for reporting year 10/2019-9/2020 we issued less permits than previous reporting years. Figure 3 shows that the total number of general permit certifications that were issued/reissued has been consistent except for the 10/2018-9/2019 reporting year when the construction general permit was administratively extended.

Figure 2 Number of individual permits issued/reissued by sector

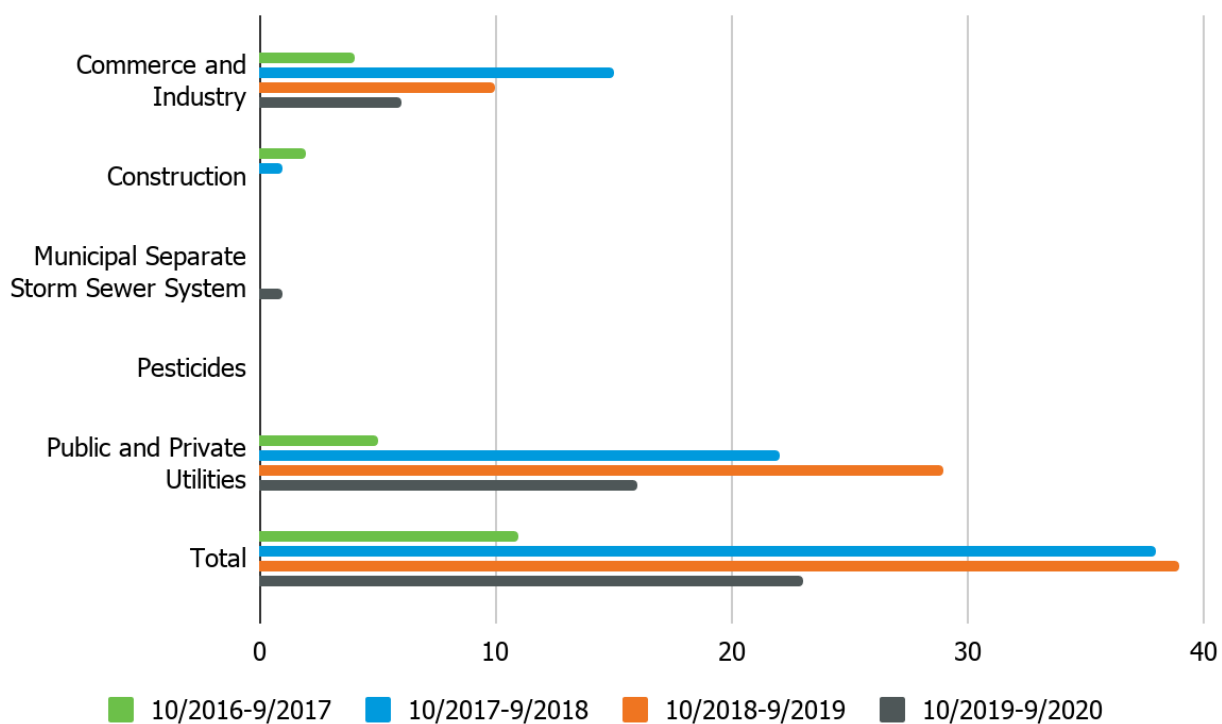
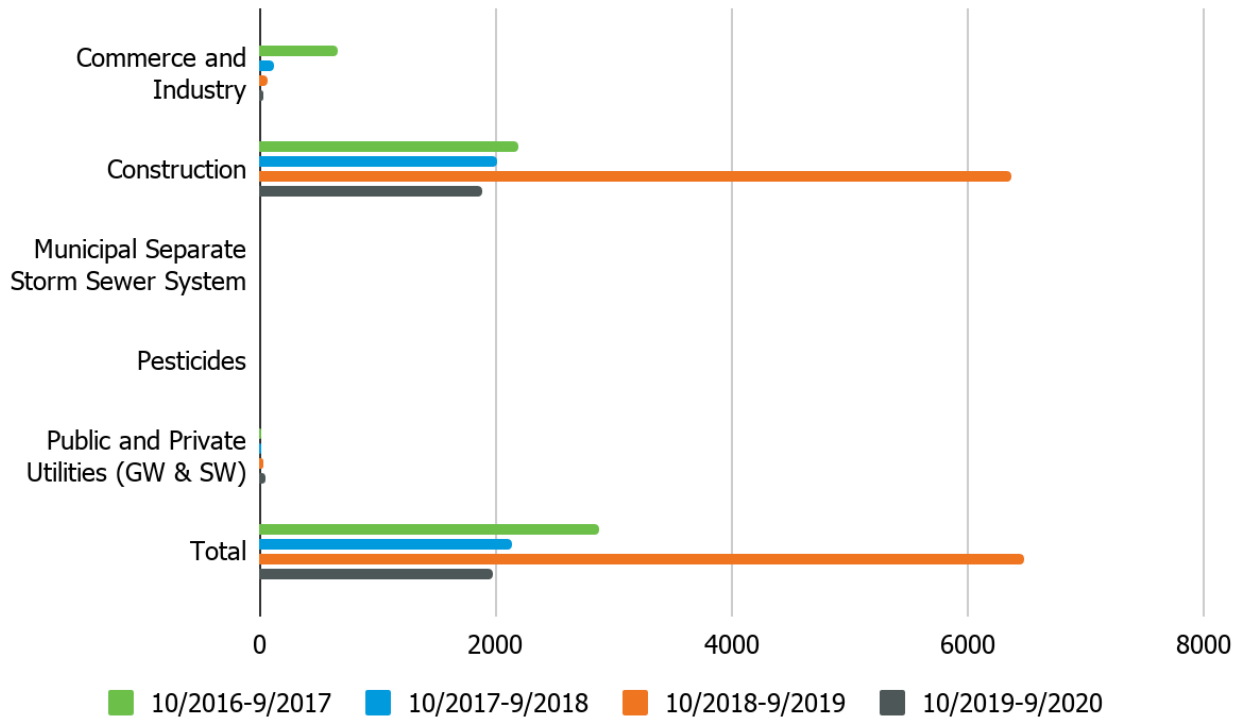


Figure 3 Number of issued/reissued general permit certifications by sector



Figures 4 and 5 show the number of individual permits and general permit certifications that were modified by sector for all of the reporting years. As previously mentioned, a permit modification is a change to an existing permit during its term. Figure 4 shows there has been an overall downward trend of individual permit modifications. The number of modifications requested varies by year so fluctuations are expected. The program prioritizes processing permit modifications so these changes are not a reflection in a change in program practices. Figure 5 demonstrates that the number of general permit certification modifications has been similar across reporting years for all sectors except the construction sector. In reporting years other than 10/2019-9/2020, the number of general permit certification modifications did not include modifications of construction stormwater general permit certifications, which are typically modified to reflect changes of acreage covered by the certification and were not accessible from EPA databases used to generate information for this report. For reporting year 10/2019-9/2020 this information was available for the construction stormwater general permit and is included in Figure 4. Appendix B provides a list of the modifications which the program processed for the 10/2019-9/2020 reporting year.

Figure 4 Number of individual permit modifications by sector

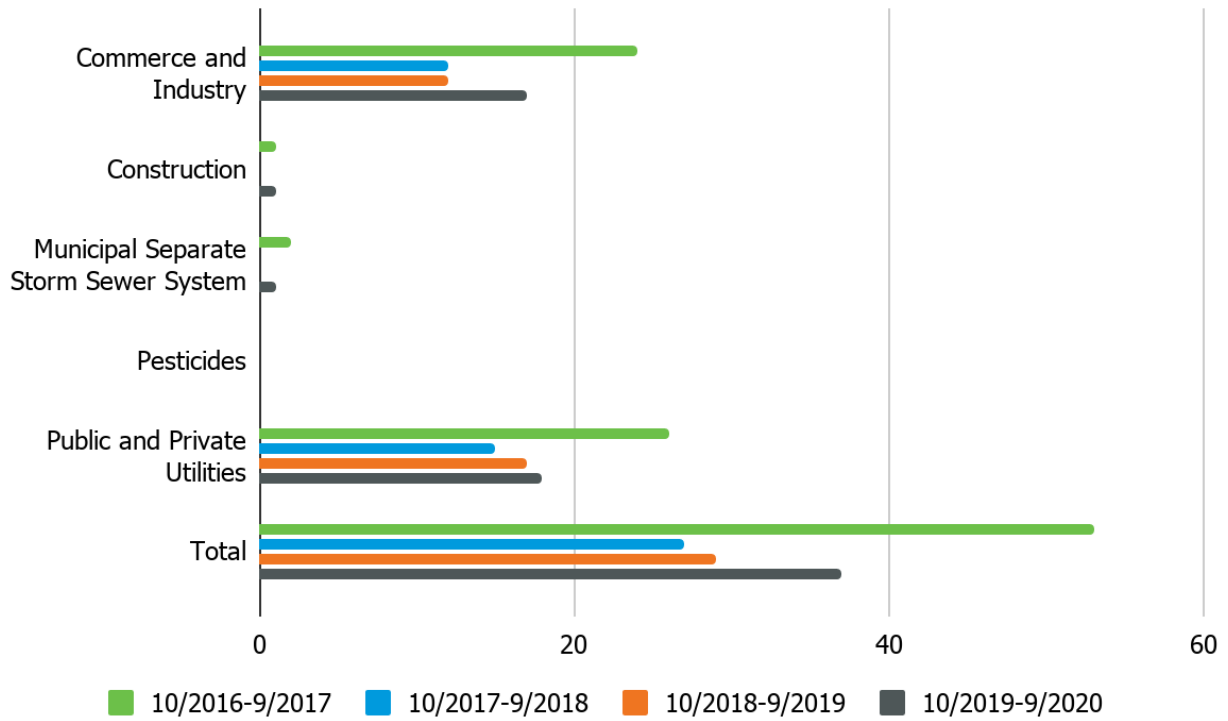
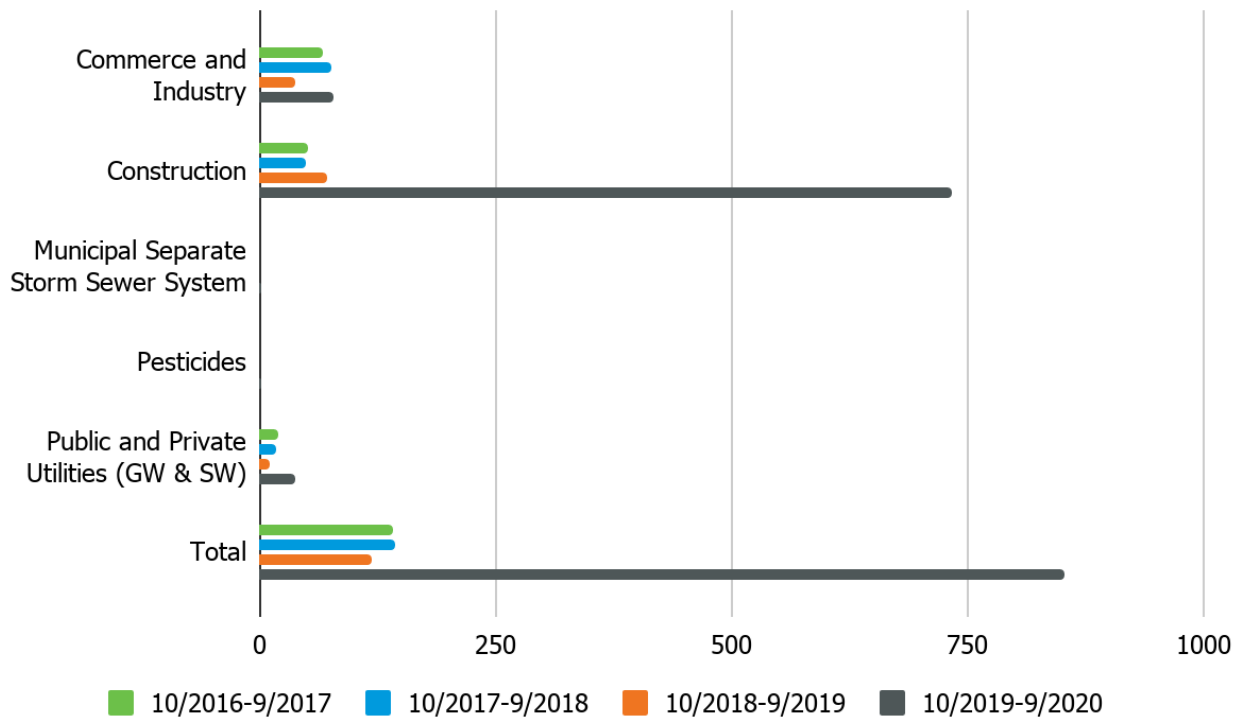


Figure 5 Number of general permit certification modifications by sector



Figures 6 and 7 show the number of individual and general permit certifications that were continued for all reporting years. Again, administratively continued permits are permits that have expired but the program has received a renewal application at least 180 days prior to the expiration date of the permit. If the program receives a complete application, but does not renew the permit prior to the expiration date, the permit is automatically administratively continued and the permittee is still authorized to discharge under its expired permit's terms and conditions. The program administratively continues both individual and general permits. Figure 6 shows that the number of individual permits continued for the commerce and industry sector have remained consistent over the past four reporting years and the public and private utilities sector have generally increased over the past four years. Figure 7 shows that the amount of general permit certifications continued for the commerce and industry and public and private utilities sectors has increased over the past four years and the construction sector has decreased over the past four years.

Figure 6 Number of individual permits administratively continued by sector

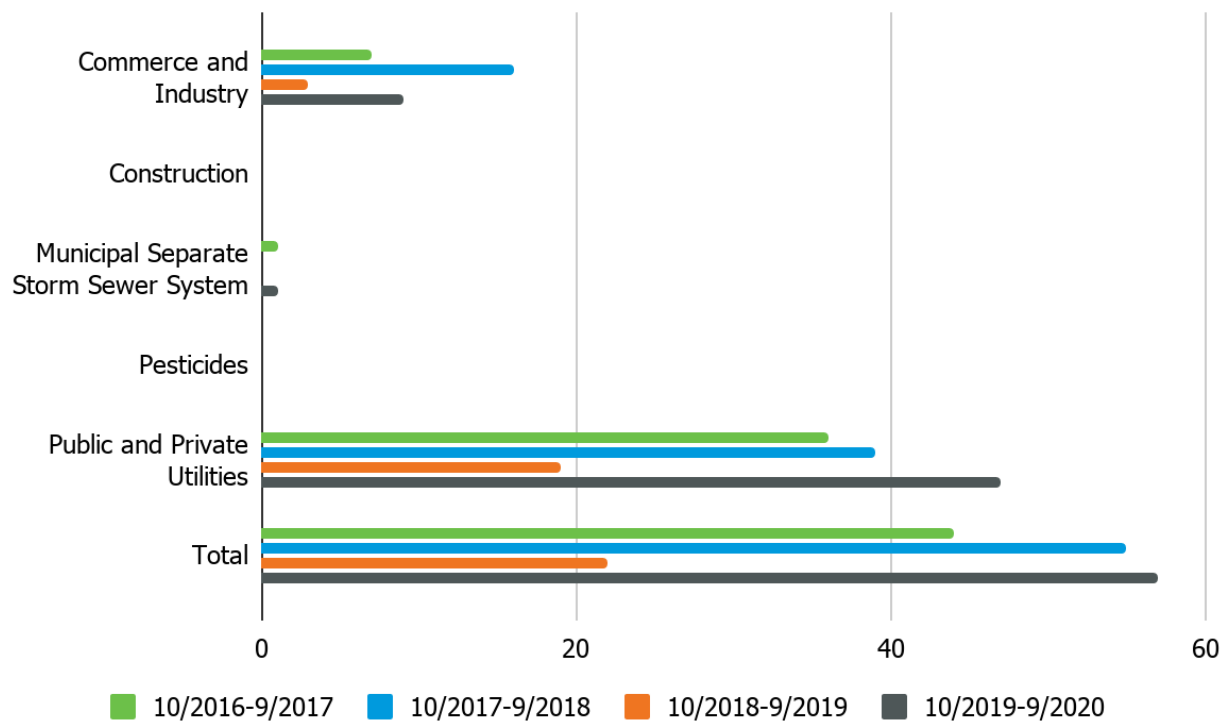
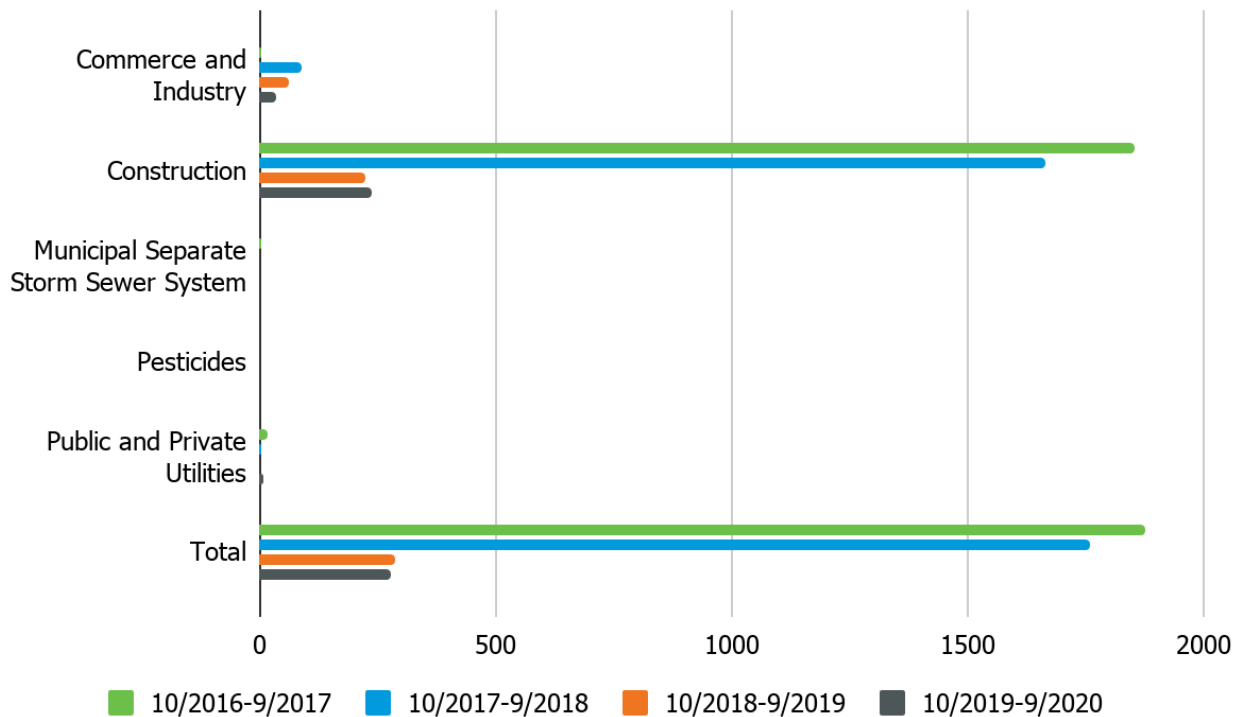


Figure 7 Number of general permit certifications administratively continued by sector



In addition to the production measures presented above, the program tracks the timeliness of permit issuance. One way to measure permit timeliness is to examine permit backlog. The federal Clean Water Act specifies that discharge permits may not be issued for a term longer than five years. Permittees who wish to continue discharging beyond the five year term must submit a completed application for permit renewal at least 180 days prior to the expiration date of their permit. If the permitting authority receives a complete application, but does not reissue the permit prior to the expiration date, the permit may be administratively continued. Permits that have been administratively continued for 180 days or more beyond their expiration date are considered to be backlogged.

Figure 8 summarizes the percentage of backlogged permits by permit type. Process water permits regulate discharges from domestic wastewater facilities or industrial process water from breweries or mining operations. Stormwater permits regulate discharges from rain and snowmelt events that flow over land or impervious surfaces, such as paved streets, parking lots, building rooftops, and industrial areas, and does not soak into the ground. The program's pesticide permit regulates the application of pesticides to or near state waters. Figure 8 shows there has been a decrease in the percent of groundwater general permits backlogged and an increase in the percent of surface water process water permits backlogged. There was a significant decrease in backlog for surface water stormwater general permits. Also, there has been an increase in individual permit backlog for all permit types over the past four years. In total, there was a significant decrease in permit backlog for the 10/2018-9/2019 reporting year. Detailed accounting used to calculate the percentages in Figures 8 can be reviewed in Appendix C.

Figure 8 Percentage of permits backlogged by permit type

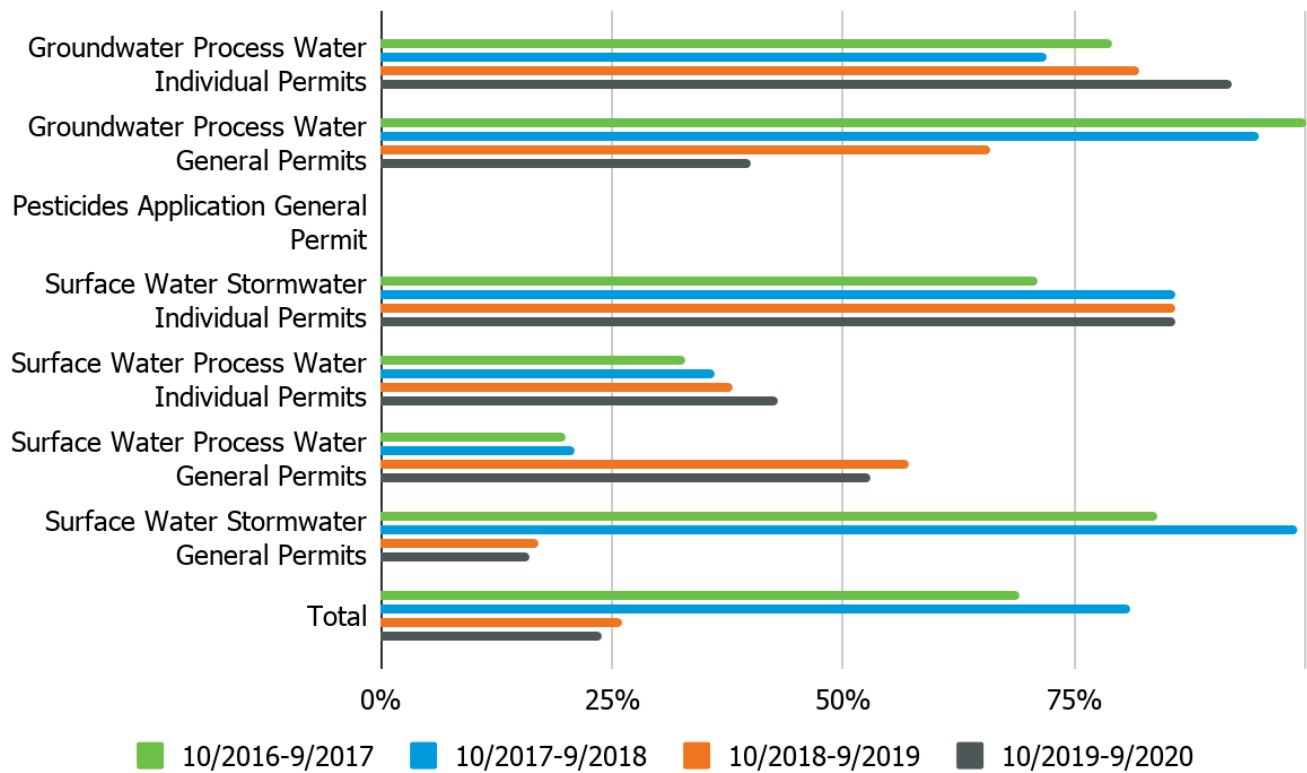
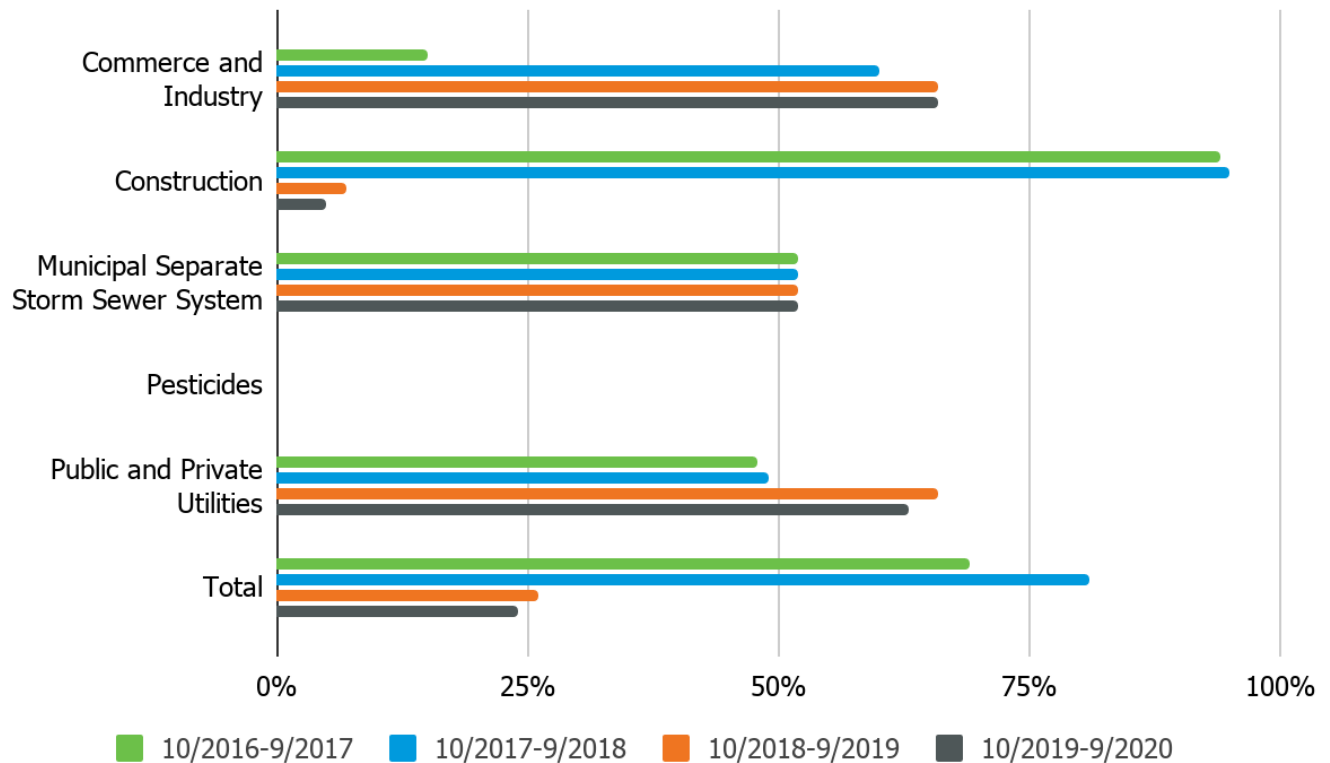


Figure 9 shows the percentage of permits backlogged by sector. Figure 9 indicates an increase in permit backlog for the commerce and industry sector and public and private utilities, that the MS4 sector backlog remained the same and that there was a dramatic decrease in the backlog for the construction sector. Detailed accounting used to calculate the percentages in Figure 9 can be reviewed in Appendix C.

Figure 9 Percentage of permits backlogged by sector



Tables 5 and 6 show the range of time permits have been backlogged. Table 5 focuses on the range of time permits have been backlogged by permit type, and Table 6 shows the range of time by sector. The information presented in both tables suggests a slight increase in the range of time permits have been backlogged throughout the reporting years except for surface water process water individual permits. The permits section continues to prioritize the oldest and least protective permits for renewal and to address the backlog by focusing on renewing general permits that cover a large number of permittees and working with permittees to transition them from individual to general permits when appropriate. In reporting years ending 9/30/2017 and 9/30/2018 a surface water process water individual permit was incorrectly categorized as a groundwater process water individual permit.

Table 5 Range of time permits have been backlogged by permit type

Permit Type	Range of time backlogged as of 9/30/2017 (years)	Range of time backlogged as of 9/20/2018 (years)	Range of time backlogged as of 9/20/2019 (years)	Range of time backlogged as of 9/20/2020 (years)
Groundwater Process Water Individual Permits	0 to 22	0 to 23	0 to 22	0 to 23
Groundwater Process Water General Permits	0.5 to 11	0 to 12	0 to 13	0 to 14

Pesticide Application General Permit	0	0	0	0
Surface Water Stormwater Individual Permits	0 to 3	0 to 4	0 to 4	0 to 6
Surface Water Process Water Individual Permits	0 to 10	0 to 11	0 to 24	0 to 25
Surface Water Process Water General Permits	0 to 6	0 to 7	0 to 8	0 to 9
Surface Water Stormwater General Permits	0 to 6	0 to 7	0 to 8	0 to 9

Table 6 Range of time permits have been backlogged by permit sector

Sector	Range of time backlogged as of 9/30/2017 (years)	Range of time backlogged as of 9/20/2018 (years)	Range of time backlogged as of 9/20/2019 (years)	Range of time backlogged as of 9/20/2020 (years)
Commerce and Industry	0 to 10	0 to 11	0 to 13	0 to 13
Construction	0 to 5	0 to 6	0 to 3	0 to 4
Municipal Separate Storm Sewer System	0 to 4	0 to 5	0 to 6	0 to 7
Pesticides	0	0	0	0
Public and Private Utilities	0 to 22	0 to 23	0 to 24	0 to 25

Table 7 and 8 summarize the average amount of time that permits have been backlogged by permit type and permit sector. This represents the average amount of time it takes to reissue an administratively extended permit. The program prioritizes processing permit modifications, issuing new permits, and processing general permit certifications over reissuing individual permits and general permits. Table 7 indicates that there have been slight decreases for groundwater process water individual permits, and surface water stormwater general permits. For the remaining permit types, Table 7 shows slight increases in the average amount of time that permits have been backlogged. The permits section continues to prioritize the oldest and least protective permits for renewal, focus on renewing general permits that cover a large number of permittees, and work with permittees to transition them from individual to general permits when appropriate. Table 8 shows that for the construction sector average backlog time has decreased. For all other sectors, Table 8 details a slight increase in backlog times.

Table 7 Average amount of time permits have been backlogged by permit type

Permit Type	Average time backlogged as of 9/30/2017 (years)	Average time backlogged as of 9/20/2018 (years)	Average time backlogged as of 9/20/2019 (years)	Average time backlogged as of 9/20/2020 (years)
Groundwater Process Water Individual Permits	10	10	9	8
Groundwater Process Water	5	6	7	8

General Permits				
Pesticide Application General Permit	0	0	0	0
Surface Water Stormwater Individual Permits	2	3	4	5
Surface Water Process Water Individual Permits	2	2	3	3
Surface Water Process Water General Permits	4	5	2	4
Surface Water Stormwater General Permits	5	5	2	3

Table 8 Average of time permits have been backlogged by permit sector

Sector	Average time backlogged as of 9/30/2017 (years)	Average time backlogged as of 9/20/2018 (years)	Average time backlogged as of 9/20/2019 (years)	Average time backlogged as of 9/20/2020 (years)
Commerce and Industry	4	2	2	4
Construction	5	6	1	2
Municipal Separate Storm Sewer System	4	5	6	7
Pesticides	0	0	0	0
Public and Private Utilities	5	5	4	5

Table 9 shows the average time in days it takes to process modifications and issue new permits or certifications by sector. Process time reflects the amount of time between when a permit application is received to when it is finalized. There were no new individual permits issued during the baseline year. For the construction sector, processing times have significantly decreased. For the remaining sectors, processing times have remained fairly consistent with slight decreases in the public and private utilities sector.

Table 9 Average processing time (days) for modifications and issued certifications and permits

Action type	Commerce and Industry	Construction	MS4	Pesticides	Public and Private Utilities
General Permit Certification Modifications					
10/2016-9/2017	15	27	n/a	n/a	66
10/2017-9/2018	45	9	99	2.5	40
10/2018-9/2019	25	5	n/a	n/a	51
10/2019-9/2020	29	2	n/a	n/a	42

Individual Permit Modifications					
10/2016-9/2017	77	n/a	n/a	n/a	83
10/2017-9/2018	97	n/a	n/a	n/a	107
10/2018-9/2019	58	n/a	n/a	n/a	79
10/2019-9/2020	52	n/a	n/a	n/a	90
General Permit Certifications Issued					
10/2016-9/2017	47	7	13	10	97
10/2017-9/2018	50	10	10	3	112
10/2018-9/2019	35	2	n/a	n/a	139
10/2019-9/2020	30	0	134	n/a	105
Individual Permits Issued					
10/2016-9/2017	n/a	n/a	n/a	n/a	n/a
10/2017-9/2018	284	n/a	n/a	n/a	395
10/2018-9/2019	152	n/a	n/a	n/a	149
10/2019-9/2020	86	n/a	287	n/a	68

Over the past 4 years, the Permits Section has implemented quality improvement recommendations for the construction sector through implementing an online permit processing system. These improvements have decreased the amount of time needed to process dewatering and stormwater permits for the construction sector. Other process improvements include a streamlined preliminary effluent limitation process for domestic permits, the temporary acceptance of digital signatures on permit applications for the duration of the COVID-19 pandemic, and clearer communications to permittees.

Based on backlog information collected for the Permits Section over the past four years and if existing vacancies in the section can be filled, the division anticipates that current backlog levels can be maintained or slightly decreased with existing staffing levels. The division hopes that staffing levels can be restored to previous levels by the end of this reporting year. Therefore, it will likely take until the 10/2021-9/2022 reporting year to restore permit production to pre-pandemic levels. This will likely result in an eventual increase in permit backlog. A focus on reducing backlog is important because permits that are more current reflect the latest actions adopted by the Water Quality Control Commission or EPA and thus better protect water quality. In addition, the division is continually focused on ways to make permits more clear. These efforts are reflected in permits as they are renewed.

Protection and restoration: Engineering

The Engineering Section provides engineering review, compliance assistance, and technical assistance for domestic wastewater treatment facilities. The section achieves these efforts through area-wide wastewater facility planning, facility site approval, engineering plan review, compliance assistance, comprehensive performance evaluation, and construction inspections for facilities funded through the State Revolving Fund Program. In

addition, the section provides onsite wastewater treatment system coordination, alternative technology reviews, and regulatory and technical assistance to industrial facilities.

Site location and design review efforts are a primary duty of the Engineering Section for the public and private utilities sector, and represent a majority of the clean water funded work performed by the Engineering Section. These values vary depending on the complexity of reviews received and are also impacted by other competing priorities. As Table 10 shows, each review engineer completes an average of 44 reviews per year. For the 10/2019-9/2020 reporting period, there were 152 reviews completed. While the number of design review engineers may vary per year, overall output remains relatively constant on a per engineer basis. Based on the information collected by the Engineering Section over the past eight years, the level of production per review engineer is likely to be consistent in the future.

Table 10 Annual output related to site location and design review applications

Reporting Year	Number of Review Engineers	Site Location Applications	Plans and Specifications	Total Reviews	Reviews per Engineer (FTE)
10/2012-9/2013	4	82	74	156	39
10/2013-9/2014	4	100	85	185	46
10/2014-9/2015	4.5	111	95	206	45
10/2015-9/2016	3.3	109	66	175	53
10/2016-9/2017	3.8	91	83	174	46
10/2017-9/2018	3.8	101	64	165	43
10/2018-9/2019	3.8	97	72	169	43
10/2019-9/2020	3.8	90	62	152	40
Average	3.9	98	75	173	44

Assurance: Inspections

Field inspections are a key component of the program's compliance assurance efforts. The Field Services Section and the Compliance and Enforcement Section are responsible for conducting inspections of permitted facilities subject to discharge permit and control regulation requirements. The type and frequency of inspections are identified in the program's annual facility inspection plan that is submitted to EPA. A compliance evaluation inspection is an on-site review of a permitted facility and their records for the purpose of evaluating the adequacy of the facility's ability to meet the requirements of the National Pollutant Discharge Elimination System and the Colorado Discharge Permit System. Depending on specific field findings, inspection staff typically provide preliminary compliance assistance or compliance advisories to facilities following an inspection.

The program is also responsible for responding to environmental releases (e.g. spills) that are reported to the department. Table 11 summarizes the number of environmental releases by sector. Responding to an environmental release creates a significant unplanned work load because the timing and magnitude of response are unpredictable. The program responded to slightly fewer spills during the 10/2019-9/2020 reporting year than the previous reporting period.

Table 11 Number of environmental releases by sector

Reporting Year	Commerce and Industry	Public and Private Utilities	Total
10/2016-9/2017	209	158	367
10/2017-9/2018	194	160	354
10/2018-9/2019	257	161	418
10/2019-9/2020	263	142	405
Average	231	155	386

The program conducts two types of inspections: compliance evaluation inspections and reconnaissance inspections. Compliance evaluation inspections include an on-site inspection of the wastewater treatment facilities or best management practices, an assessment of their condition, a review of the permit conditions and compliance with those conditions, and an inspection report. Reconnaissance inspections can include an on-site inspection or a review of permit conditions and compliance, but usually not both. Reconnaissance inspections can also include site visits as a response to complaints and to provide compliance assistance. Compliance evaluation inspections are further divided into two categories: major facility compliance evaluation inspections and minor and non-classified facility compliance evaluation inspections. The permits that the program issues are classified as major or minor based on the rate of flow discharged, population covered by the permit, and the magnitude and character of the discharge. In addition, the program inspects facilities that are regulated under commission control regulations including reclaimed water and biosolids facilities.

Table 12 summarizes the number of inspections by sector for the categories described above. In addition to the number of inspections completed for all reporting years, the inspection targets or goals are included. Inspection targets for the major and minor facilities are established based on EPA's 2014 Clean Water National Pollutant Discharge Elimination Compliance Monitoring Strategy. This strategy covers all of the sectors listed in Table 12 except for the public and private utilities reclaimed water and biosolids sectors, whose targets were established to be consistent with the national strategy. The pesticides sector is covered by the national strategy; however, the strategy allows states to decide the best inspection strategy for these permits, and the program uses reconnaissance techniques for inspecting these permittees. For the MS4 sector, the program lacks resources to conduct effective oversight for the 116 cities, counties, and special districts with permits for stormwater runoff within urban areas. The limited resources for the MS4 sector are instead devoted primarily to drafting permits, compliance assistance, and enforcement resulting from previously identified violation(s). The lack of resources for oversight of the municipal separate storm sewer sector has been long-standing. HB17-1285 was focused on maintaining existing services, so funding from this bill was not intended for oversight of this sector. The amount of inspections has been consistent throughout all reporting years except for 10/2019-9/2020. There was a decrease in the amount of inspections due to the COVID-19 pandemic's impact on the program's ability to conduct inspections safely and as discussed previously the pace of hiring vacant positions also decreased during the 10/2019-9/2020 due to the COVID-19 pandemic.

Table 12 Number of compliance oversight inspections completed by sector

Year	Commerce and Industry	Public and Private Utilities Domestic Water and Wastewater	Public & Private Utilities Reclaimed Water	Construction	Pesticides	Biosolids	MS4
Major Facility Compliance Evaluation Inspections							

10/2016-9/2017	10	34	n/a	n/a	n/a	n/a	0
10/2017-9/2018	8	30	n/a	n/a	n/a	n/a	0
10/2018-9/2019	5	26	n/a	n/a	n/a	n/a	0
10/2019-9/2020	0	29	n/a	n/a	n/a	n/a	0
10/2019-9/2020 Targets	20	47	3	n/a	n/a	n/a	1
Minor Facility and Unclassified Facility Compliance Evaluation Inspections							
10/2016-9/2017	42	71	27	309	n/a	57	0
10/2017-9/2018	40	123	14	432	n/a	71	0
10/2018-9/2019	56	61	14	357	n/a	69	0
10/2019-9/2020	29	44	1	172	0	75	0
10/2019-9/2020 Targets	281	108	52	518	0	68	24
Reconnaissance Inspections							
10/2016-9/2017	9	7	0	75	15	0	0
10/2017-9/2018	17	2	3	97	13	1	0
10/2018-9/2019	25	2	1	86	0	0	0
10/2019-9/2020	5	0	0	414*	0	0	0
10/2018-9/2019 Targets	n/a	n/a	n/a	136	5	0	3
Total							
10/2016-9/2017	61	112	27	384	15	57	0

10/2017-9/2018	65	155	17	529	13	72	0
10/2018-9/2019	86	89	15	443	0	69	0
10/2019-9/2020	34	73	1	586	0	75	0

*The division relied heavily on reconnaissance versus compliance evaluation inspections in 2020 to maintain oversight over the construction sector while social distancing.

Assurance: Enforcement

The Compliance and Enforcement section is responsible for ensuring the regulated community complies with the requirements of the Colorado Water Quality Control Act and its implementing regulations. Work can be placed into three broad categories: compliance assistance, informal compliance assurance, and formal enforcement activities. Enforcement staff follow established formal and informal enforcement response criteria outlined in the program's enforcement management system.

Compliance assistance - Compliance assistance helps people and entities understand and comply with regulatory requirements and provides general technical assistance to the regulated community. Compliance assistance tools and methods include telephone and email assistance, guidance documents, and training for the regulated community.

Informal compliance assurance - The objective of informal compliance assurance is to facilitate resolution of noncompliance problems without the more rigorous and resource intensive administrative or judicial enforcement process. This includes review of self-reported and field-generated data, comparison of the information to established enforcement criteria, issuance of compliance advisories, and any associated follow-up activities. Informal compliance assurance does not include the assessment of monetary penalties.

Formal enforcement - Formal enforcement actions are authorized under §25-8-601 C.R.S. through §25-8-612 C.R.S. and §25-9-110 C.R.S. Enforcement may happen when compliance is not achieved through informal compliance assurance or in cases of serious violations that pose a threat to public health or the environment. This category includes administrative remedies and civil judicial actions. Formal enforcement actions can be used to require compliance with permits, regulations, and statutes and are subject to the appeal rights of the violator.

The vast majority of discharge permits require an entity to monitor their discharge for compliance. This data is reported to the program via discharge monitoring reports (DMR). Given that there are over 8,000 permittees across the state and limited program resources, staff members are only able to complete onsite evaluations for around 10 percent of permitted facilities per year. Therefore, timely submission of complete and accurate self-reported data is essential to determining an entity's permit compliance and provides a summary of the quality of the water discharged from the facility. Table 13 shows the number of facilities with delinquent or deficient DMR violations by sector. There has been a downward trend in the number of DMR violations for the construction sector as the program has made a concerted effort over the past several years to improve the amount and quality of DMR submissions for this sector.

Table 13 Number of facilities with delinquent or deficient DMR violations by sector

Sector	10/2016-9/2017	10/2017-9/2018	10/2018-9/2019	10/2019-9/2020
Commerce and Industry	432	321	423	322

Construction	485	390	350	324
Public and Private Utilities	241	144	198	137
MS4, Pesticides, and Biosolids	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors

Table 14 shows the number of facilities with effluent violations by sector. The number of facilities with violations was similar across reporting years except for the 10/2019-9/2020 reporting year where the number of violations for the construction and public and private utilities sectors increased.

Table 14 Number of facilities with effluent violations by sector

Sector	10/2016-9/2017	10/2017-9/2018	10/2018-9/2019	10/2019-9/2020
Commerce and Industry	74	82	94	97
Construction	108	122	119	183
Public and Private Utilities	236	237	260	346
MS4, Pesticides, and Biosolids	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors	DMR Reporting not required for these sectors

Table 15 summarizes the number of compliance advisories that were issued by sector. The amount of compliance advisories has been fairly consistent throughout all reporting years except for the commerce and industry sector. During the 10/2017-9/2018 and 10/2018-9/2019 reporting years, the commerce and industry sector saw an increased number of compliance advisories due to the issuance of compliance advisories for industrial stormwater permittees that were focused on improving the DMR compliance rate for these permittees.

Tables 15 Number of facilities that had compliance advisories issued

Sector	10/2016-9/2017	10/2017-9/2018	10/2018-9/2019	10/2019-9/2020
Commerce and Industry	422	1,404	942	451
Construction	1,029	1,384	1,163	956
Public and Private Utilities	785	763	656	623
MS4	0	7	0	0
Pesticides	0	0	0	0
Biosolids	0	2	2	0
Total	2,236	3,560	2,763	2,030

Table 16 summarizes the number of enforcement actions issued by sector for the reporting year, which are similar across reporting years. Note that the number of formal enforcement actions is significantly fewer than the number of facilities with violations, as reported in Table 14 above. The enforcement actions summarized in Table 16 include:

Notice of Violation (NOV), Cease and Desist Order (CDO), Clean-up Order (CUO) – These are a formal notification that a person or entity has violated the law. These actions outline corrective actions required to resolve the violations. The program imposes civil penalties when an NOV, CDO, or CUO has been issued.

Compliance Order on Consent and Expedited Settlement Agreement – These are settlement agreements that resolve violations and penalties and in some cases include corrective action requirements.

Order for Civil Penalty (OCP) - The program imposes civil penalties through issuance of OCPs. Penalties for violations of the Colorado Water Quality Control Act are assessed consistent with §25-8-608 C.R.S. and the program's penalty policies. Penalties consider the following factors:

- The potential damage of the violation(s).
- The violator's compliance history.
- Whether the violation(s) was intentional, reckless, or negligent.
- The impact or threat to public health and the environment.
- The duration of the violation(s).
- The economic benefit realized as a result of the violation.

The maximum civil penalty for violations of the Colorado Water Quality Control Act is \$10,000 per day of violation. This amount will be increased to \$54,833 per day per violation based on Colorado House Bill 20-1143 during a Water Quality Control Commission rulemaking in October 2021. Penalties for violations of the Water and Wastewater Treatment Facility Operators Statute are assessed consistent with §25-9-110 C.R.S. and consider the facility type, treatment complexity, and duration of the violation. The maximum penalty for violations of the Water and Wastewater Treatment Facility Operators Statute and its implementing regulation is \$300 per day of violation.

Judicial Actions - Civil enforcement actions are judicial actions taken against a violator when violations are determined to be serious enough to warrant seeking restraining orders, injunctions, and/or court-ordered civil penalties or remedies.

Table 16 Number of enforcement actions issued including amendments to existing orders

Year	Notice of Violation/ Cease and Desist Orders or Clean-up Orders	Compliance Orders on Consent	Expedited Settlement Agreements	Order for Civil Penalty	Judicial Actions	Total
10/2016-9/2017	25	11	6	8	2	52
10/2017-9/2018	26	11	0	12	2	51
10/2018-9/2019	28	19	0	17	0	64
10/2019-9/2020	42	21	2	41	0	106

Conclusion and recommendations

Table 17 summarizes how all reporting years compared to the baseline year for HB17-1285 reporting requirements. During the baseline or 10/2016-9/2017 reporting year, the program began to restore staffing levels based on

funding provided by HB17-1285. Staffing levels for the 10/2018-9/2019 reporting year included vacancies due to attrition that is commensurate with historic rates at the division. For the 10/2019-10/2020 reporting year, vacancies were due to normal attrition, however due to the COVID-19 pandemic, the pace of hiring replacements was reduced significantly. The number of vacancies during 10/2019-10/2020 directly impacted production for inspections and permits. In addition, there was a decrease in the amount of inspections due to the COVID-19 pandemic's impact on the program's ability to conduct inspections safely. Production levels for the remaining reporting categories were similar to the baseline year's production levels, as anticipated. The division has renewed hiring and hopes that staffing levels can be restored to previous levels by the end of this reporting year. In addition, the division hopes to be able to resume pre-pandemic inspection practices by the end of this reporting year. Therefore, it will likely take until the 10/2021-9/2022 reporting year to restore inspection and permit production to pre-pandemic levels. This will likely result in an eventual increase in permit backlog.

Table 17 Comparison of HB17-1285 requirements for all reporting years compared to the baseline year

Reporting Category	10/2017-9/2018 compared to baseline year	10/2018-9/2019 compared to baseline year	10/2019-9/2020 compared to baseline year
Program staffing levels	↑	↑	↔
Standards development	↔	↔	↔
Permit production	↑	↑	↑
Permit timeliness	↔	↑	↑
Engineering reviews production	↔	↔	↔
Inspection production	↔	↔	↓
Enforcement actions	↔	↔	↔

For the next reporting year, the division will continue to track the information used to develop this report and will document quality improvement efforts.

Appendix A Program finances

Revenue and expenditures provided to the Colorado General Assembly Joint Budget Committee on February 18, 2021 for SFY19-20 and first half of SFY20-21.

Fiscal Year 2019-20 Financial Results

SFY19-20 Year End Results

Sector Budget:	TOTAL LB Spending Auth*	Collected Revenue**	Sector Expenses	Admin Expenses***	POTS Expenses	Indirect Expenses***	Total Expenses
Commerce and Industry	\$ 3,089,389	\$ 1,397,208	\$ 2,153,894	\$ 103,102	\$ 385,060	\$ 288,751	\$ 2,930,807
General Fund	\$ 1,162,502	\$0	\$ 961,965	\$20,475	\$ 179,690	\$0	\$ 1,162,130
Cash Funds - 2019	\$ 1,495,783	\$1,397,208	\$ 956,857	\$78,598	\$ 205,370	\$241,930	\$ 1,482,755
Federal Funds	\$ 431,104	\$0	\$ 235,072	\$4,029	\$ -	\$46,821	\$ 285,922
Construction	\$ 3,398,509	\$ 2,857,340	\$ 1,912,214	\$ 106,627	\$ 293,971	\$ 368,590	\$ 2,681,402
General Fund	\$ 303,567	\$0	\$ 238,160	\$5,347	\$ 47,444	\$0	\$ 290,951
Cash Funds - 2021	\$ 2,182,831	\$2,857,340	\$ 1,436,210	\$98,363	\$ 246,527	\$320,919	\$ 2,102,019
Federal Funds	\$ 912,111	\$0	\$ 237,844	\$2,917	\$ -	\$47,671	\$ 288,432
MS4	\$ 379,971	\$ 200,526	\$ 251,900	\$ 12,101	\$ 17,723	\$ 37,497	\$ 319,221
General Fund	\$ 120,239	\$0	\$ 95,037	\$2,118	\$ 15,670	\$0	\$ 112,825
Cash Funds - 2023	\$ 182,800	\$200,526	\$ 119,273	\$9,264	\$ 2,053	\$29,912	\$ 160,502
Federal Funds	\$ 76,932	\$0	\$ 37,590	\$719	\$ -	\$7,585	\$ 45,894
Pesticides	\$ 261,367	\$ 12,083	\$ 183,626	\$ 4,781	\$ 28,123	\$ 1,264	\$ 217,794
General Fund	\$ 227,666	\$0	\$ 178,134	\$4,010	\$ 27,668	\$0	\$ 209,812
Cash Funds - 2022	\$ 10,320	\$12,083	\$ 1,418	\$552	\$ 455	\$414	\$ 2,839
Federal Funds	\$ 23,381	\$0	\$ 4,074	\$219	\$ -	\$850	\$ 5,143
Public/Private Utilities	\$ 5,139,154	\$ 2,712,311	\$ 3,602,293	\$ 187,749	\$ 637,492	\$ 536,603	\$ 4,964,137
General Fund	\$ 1,678,441	\$0	\$ 1,364,750	\$29,562	\$ 272,668	\$0	\$ 1,666,980
Cash Funds - 2024	\$ 2,690,742	\$2,712,311	\$ 1,713,605	\$150,990	\$ 364,824	\$435,224	\$ 2,664,643
Federal Funds	\$ 769,971	\$0	\$ 523,938	\$7,197	\$ -	\$101,379	\$ 632,514
WQ Certifications	\$ 248,350	\$ 174,092	\$ 143,904	\$ 3,852	\$ 17,000	\$ 30,899	\$ 195,655
General Fund	\$ 10,317	\$0	\$ 1,580	\$182	\$ 356	\$0	\$ 2,118
Cash Funds - 2018	\$ 238,033	\$174,092	\$ 102,074	\$3,423	\$ 16,644	\$22,881	\$ 145,022
Federal Funds	\$ 26,476	\$0	\$ 40,250	\$247	\$ -	\$8,018	\$ 48,515
Total	\$ 12,543,216	\$ 7,353,560	\$ 8,247,831	\$ 418,212	\$ 1,379,369	\$ 1,263,604	\$ 11,309,016
General Fund	\$ 3,502,732	\$0	\$ 2,839,626	\$61,694	\$ 543,496	\$0	\$ 3,444,816
Cash Funds	\$ 6,800,509	\$7,353,560	\$ 4,329,437	\$341,190	\$ 835,873	\$1,051,280	\$ 6,557,780
Federal Funds	\$ 2,239,975	\$0	\$ 1,078,768	\$15,328	\$ -	\$212,324	\$ 1,306,420

*The LB spending authority amount represents the clean water sectors, spending authority assigned to the sectors from HB 16-1413, the Admin and Indirect Cost line items, and POTS allocations.

**Revenue applies to cash funds only. Refer to LB Spending Auth for General and Federal Funds. Revenue is billed in the first quarter of the year for the entire fiscal year for Commerce & Industry, MS4, and Public/Private Utilities; therefore revenue is front loaded in the first quarter for these three sectors. The remaining sectors receive funding throughout the year. This total includes collected cash fund revenues only.

***The Admin and Indirect expenses refer to expenses at the Division level that support the Clean Water Sectors.

Appendix B Permit modifications

List of permit modifications completed from 10/2019-9/2020.

Permit ID	Permit Sector	Permittee
CO0020443	Public and private utilities	Crested Butte Town of
CO0021440	Public and private utilities	Fort Lupton City of
CO0021687	Public and private utilities	Mancos Town of
CO0024082	Public and private utilities	Durango City of
CO0026671	Public and private utilities	Longmont City of
CO0026671	Public and private utilities	Longmont City of
CO0027171	Public and private utilities	Mount Crested Butte Water and Sanitation Dist
CO0031844	Public and private utilities	Upper Thompson Sanitation Dist
CO0032999	Public and private utilities	South Platte Water Renewal Partners
CO0034304	Public and private utilities	Young Life Frontier
CO0037044	Public and private utilities	Forest Hills Metro District
CO0037966	Public and private utilities	Centennial Water and Sanitation Dist
CO0040533	Public and private utilities	Creede City of
CO0045420	Public and private utilities	Upper Blue Sanitation District
CO0046451	Public and private utilities	Wellington Town of
CO0048623	Public and private utilities	Sidney Peak Ranch
CO0048985	Public and private utilities	Eden Valley Institute
CO0049053	Public and private utilities	Aurora City of
CO0049003	Construction	PM Realty Group
COS000005	MS4	CDOT
CO0000051	Commerce and industry	POC 1 LLC
CO0000132	Commerce and industry	Oxbow Mining LLC
CO0000213	Commerce and industry	Elk Ridge Mining and Reclamation LLC
CO0000213	Commerce and industry	Elk Ridge Mining and Reclamation LLC
CO0000213	Commerce and industry	Elk Ridge Mining and Reclamation LLC
CO0000612	Commerce and industry	Public Service Co of Colorado
CO0038776	Commerce and industry	Mountain Coal Co LLC
CO0038776	Commerce and industry	Mountain Coal Co LLC
CO0038776	Commerce and industry	Mountain Coal Co LLC
CO0044776	Commerce and industry	Bowie Resources LLC
CO0045161	Commerce and industry	Colowyo Coal Co LP
CO0047554	Commerce and industry	Union Pacific Railroad Co
CO0047776	Commerce and industry	Evergreen Natural Resources LLC
CO0047776	Commerce and industry	Evergreen Natural Resources LLC
CO0048275	Commerce and industry	Peabody Sage Creek Mining LLC % Twentymile Coal L
CO0048964	Commerce and industry	Molson Coors USA LLC
CO0048986	Commerce and industry	Union Pacific Railroad Company
COG130004	Commerce and industry	Colorado Parks and Wildlife
COG130019	Commerce and industry	Colorado Parks and Wildlife
COG130020	Commerce and industry	Colorado Parks and Wildlife
COG500250	Commerce and industry	Aggregate Industries WCR Inc
COG500299	Commerce and industry	Oldcastle SW Group Inc
COG500320	Commerce and industry	Aggregate Industries WCR Inc

Permit ID	Permit Sector	Permittee
COG500320	Commerce and industry	Aggregate Industries WCR Inc
COG500394	Commerce and industry	LG Everist Inc
COG500464	Commerce and industry	Oldcastle SW Group Inc
COG500464	Commerce and industry	Oldcastle SW Group Inc
COG501525	Commerce and industry	Elam Construction Inc
COG501533	Commerce and industry	Broken Arrow Investments LLC
COG501542	Commerce and industry	Oldcastle SW Group Inc
COG501546	Commerce and industry	Burnco Colorado LLC
COG501547	Commerce and industry	Burnco Colorado LLC
COG501548	Commerce and industry	Burnco Colorado LLC
COG501549	Commerce and industry	Burnco Colorado LLC
COG501578	Commerce and industry	LG Everist Inc
COG501586	Commerce and industry	Asphalt Specialties Co Inc
COG501594	Commerce and industry	Martin Marietta Materials Inc
COG501603	Commerce and industry	Asphalt Specialties Co Inc
COG501620	Commerce and industry	Burnco Colorado LLC
COG501735	Commerce and industry	Parkerson Brothers LLC
COG501747	Commerce and industry	Martin Marietta Materials Inc
COG501789	Commerce and industry	Rock Pile LLC
COG501797	Commerce and industry	Seifert Enterprises LLC
COG501939	Commerce and industry	Fremont Paving and Redi Mix Inc
COG501943	Commerce and industry	Clare Corp dba AC Concrete and Materials
COG502028	Commerce and industry	Martin Marietta Materials Inc
COG502028	Commerce and industry	Martin Marietta Materials Inc
COG502062	Commerce and industry	Canon Dolomite Quarry LLC
COG502141	Commerce and industry	ESCO Sand and Gravel LLC
COG502166	Commerce and industry	Burnco Colorado LLC
COG502170	Commerce and industry	Burnco Colorado LLC
COG502179	Commerce and industry	Martin Marietta Materials Inc
COG603101	Commerce and industry	Boulder County
COG603115	Commerce and industry	Hines Interests Limited Partnership
COG603295	Commerce and industry	Lion Owners Association Inc
COG603356	Commerce and industry	South Metro Fire Rescue
COG603357	Commerce and industry	Eating Recovery Center
COG603397	Commerce and industry	Streets Dept, City of Fort Collins
COG603402	Commerce and industry	Shannon and Wilson Inc
COG607050	Commerce and industry	MHL Broomfield Owner LLC
COG607130	Commerce and industry	Legacy Air HVAC LLC
COG840016	Commerce and industry	Impetro Resources LLC
COG840021	Commerce and industry	Impetro Resources LLC
COR900080	Commerce and industry	Window Products Inc
COR900166	Commerce and industry	Vestas Blades America Inc

Permit ID	Permit Sector	Permittee
COR900211	Commerce and industry	Colorado Air and Space Port
COR900334	Commerce and industry	Kilgore Comanies LLC, dba Peak Ready Mix
COR900356	Commerce and industry	V and S Holdings LLC
COR900388	Commerce and industry	Aggregate Industries WCR Inc
COR900544	Commerce and industry	BH Industrial Properties LLC
COR900632	Commerce and industry	Schmidt Construction Co
COR900638	Commerce and industry	Kiewit Infrastructure Co
COR900642	Commerce and industry	Aggregate Industries WCR Inc
COR900661	Commerce and industry	Contech Engineered Solutions LLC
COR900666	Commerce and industry	IMI Norgren Inc
COR900728	Commerce and industry	Metal Movers Inc
COR900793	Commerce and industry	Basalite Concrete Products LLC
COR900888	Commerce and industry	Oldcastle Precast Inc
COR900951	Commerce and industry	Colorado Industrial Recycling
COR900961	Commerce and industry	Waste Management of Colorado Inc
COR900970	Commerce and industry	Safety Kleen Systems Inc
COR901186	Commerce and industry	Burnco Colorado LLC
COR901187	Commerce and industry	Burnco Colorado LLC
COR901188	Commerce and industry	Burnco Colorado LLC
COR901189	Commerce and industry	Burnco Colorado LLC
COR901206	Commerce and industry	Specialty Metals Co LLC
COR901240	Commerce and industry	Littleton U Pull LLC
COR901256	Commerce and industry	Pacific Steel and Recycling
COR901329	Commerce and industry	Altium Packaging LP
COR901476	Commerce and industry	MI Windows and Doors LLC
COR901490	Commerce and industry	Aggregate Industries WCR Inc
COR901513	Commerce and industry	Amazon.com Services LLC
COR901515	Commerce and industry	Burnco Colorado LLC
COR901531	Commerce and industry	Amazon.com Services LLC
COR901533	Commerce and industry	Amazon.com Services LLC
COG076115	Construction	Noble Midstream Services, LLC
COG076198	Construction	Kiewit Infrastructure Co
COG076198	Construction	Kiewit Infrastructure Co
COG076199	Construction	Noble Midstream Services, LLC
COG076199	Construction	Noble Midstream Services, LLC
COG076419	Construction	Oakwood Homes LLC
COG076429	Construction	City of Fruita
COG076484	Construction	Martin Marietta Materials Inc
COG076486	Construction	Noble Midstream Services, LLC
COG076560	Construction	Reynolds Construction LLC
COG076567	Construction	Park Creek Metropolitan District
COG076608	Construction	Duckels Construction, Inc.

Permit ID	Permit Sector	Permittee
COG076636	Construction	Tallgrass Energy
COG076636	Construction	Tallgrass Energy
COG076647	Construction	Black Hills Energy
COG076658	Construction	Noble Midstream Services, LLC
COG076658	Construction	Noble Midstream Services, LLC
COG076682	Construction	Lendlease
COG076716	Construction	Premier Earthworks & Infrastructure Inc
COG076720	Construction	DeFalco Construction Company
COG076750	Construction	BT Construction Inc
COG076763	Construction	Scott Contracting
COG076781	Construction	HydroCon Environmental
COG076781	Construction	HydroCon Environmental
COG076781	Construction	HydroCon Environmental
COG076787	Construction	Wildcat Construction
COG076797	Construction	Heyl Construction, Inc
COG076821	Construction	Noble Midstream Services, LLC
COG076847	Construction	J.R. Filanc Construction Company, Inc.
COG076857	Construction	American West Construction
COG076859	Construction	Concrete Express, Inc.
COG076880	Construction	53 Corporation
COG076893	Construction	Fanas Architecture
COG076909	Construction	Whitehead Engineering, LLC
COG076915	Construction	BP America Production Company
COG076927	Construction	Tallgrass Energy
COG076944	Construction	HEI Civil
COG076944	Construction	HEI Civil
COG076948	Construction	Reynolds Construction, LLC
COG076958	Construction	SEMA Construction, Inc.
COG076963	Construction	Scott Contracting, Inc.
COG076967	Construction	Elite Surface Infrastructure
COG080004	Construction	Connell Resources, Inc.
COG080005	Construction	Smith Environmental and Engineering
COG080006	Construction	Smith Environmental and Engineering
COG080007	Construction	Smith Environmental and Engineering
COG315417	Construction	Unico Properties LLC
COG315528	Construction	DCS Owner LLC
COG315565	Construction	Ames Construction
COG315565	Construction	Ames Construction
COG315586	Construction	Calcon Constructors, Inc.
COG315588	Construction	E-21 Engineering, Inc.
COG315589	Construction	TerraFirma Earth Technologies
COG315593	Construction	The Beck Group

Permit ID	Permit Sector	Permittee
COG315596	Construction	Southern Land Company
COG315606	Construction	Denver Water
COG315607	Construction	Shaw Construction
COG315611	Construction	Kraemer North America
COG315613	Construction	Shaw Construction
COG317002	Construction	Infinity Communities Inc
COG318014	Construction	Western Office Portfolio Owner LLC
COG604339	Construction	Noble Midstream Partners
COG604341	Construction	Noble Midstream Partners
COG604341	Construction	Noble Midstream Partners
COG604341	Construction	Noble Midstream Partners
COG604341	Construction	Noble Midstream Partners
COG604377	Construction	Noble Midstream Services LLC
COG604377	Construction	Noble Midstream Services LLC
COG604377	Construction	Noble Midstream Services LLC
COG604381	Construction	Noble Midstream Services LLC
COG604381	Construction	Noble Midstream Services LLC
COG604384	Construction	Occidental Petroleum Corp
COG604387	Construction	Noble Midstream Services LLC
COG604387	Construction	Noble Midstream Services LLC
COG604387	Construction	Noble Midstream Services LLC
COG604394	Construction	PCI Construction Inc
COG604395	Construction	Kiewit Infrastructure Co
COG604395	Construction	Kiewit Infrastructure Co
COG604397	Construction	Noble Midstream Services LLC
COG604397	Construction	Noble Midstream Services LLC
COG604400	Construction	SemGroup Energy Partners LLC
COG588026	Public and private utilities	Lipslea Enterprises LLC
COG588102	Public and private utilities	BCFS HHS
COG589010	Public and private utilities	Purgatory Metro Dist
COG589146	Public and private utilities	Timbers Water and Sanitation District
COG641193	Public and private utilities	Roxborough Water and Sanitation Dist
COX631005	Public and private utilities	Alexander Dawson School
COX631008	Public and private utilities	Highlands Presbyterian Camp and Retreat Center
COX631011	Public and private utilities	CDOT
COX631012	Public and private utilities	Dotsero MHP LLC
COX631012	Public and private utilities	Dotsero MHP LLC
COX631013	Public and private utilities	Wiggins Town of
COX631014	Public and private utilities	Spear Inc
COX631014	Public and private utilities	Spear Inc
COX631032	Public and private utilities	Walden Corp
COX631045	Public and private utilities	CDPW

Permit ID	Permit Sector	Permittee
COX631049	Public and private utilities	Gilpin County School Dist RE1
COX631050	Public and private utilities	Grover Town of
COX631051	Public and private utilities	Sage Pointe Water and Sanitation Co
COX631052	Public and private utilities	University of Colorado
COX631068	Public and private utilities	Colorado State University
COX631068	Public and private utilities	Colorado State University
COX631077	Public and private utilities	Ute Pass LLC
COX634010	Public and private utilities	Bethune Town of
COX634011	Public and private utilities	Petroleum Wholesale LP
COX634014	Public and private utilities	Shultz Family Investments LLC (SFI)
COX634020	Public and private utilities	Aqua Ramon Club
COX634020	Public and private utilities	Aqua Ramon Club
COX634020	Public and private utilities	Aqua Ramon Club
COX634021	Public and private utilities	Gold Lake Ventures LLC
COX634024	Public and private utilities	Hangin Tree Travel Plaza LLC
COX634025	Public and private utilities	Prairie PK-12 School Dist
COX634029	Public and private utilities	Steamboat Springs City of
COX634035	Public and private utilities	Sky Ranch Horn Creek
COX634035	Public and private utilities	Sky Ranch Horn Creek
COX634046	Public and private utilities	Gunnison Lakeside Campground and RV Park
COX634061	Public and private utilities	Starwood Mountain Ranch LLC
COX634071	Public and private utilities	GS Pinon Pines LLC
COG315260	Construction	Safeway Inc
COG075606	Construction	Flatiron AECOM LLC
COR401700	Construction	Flatiron Development and Custom Homes
COR403308	Construction	HEI Civil
COR405257	Construction	FCI Constructors, Inc.
COR404624	Construction	TEP Rocky Mountain LLC
COR400077	Construction	Aerotropolis Area Coordinating Metro District
COR401744	Construction	Fransen Pittman General Contractors, Inc.
COR401222	Construction	Cureton Front Range LLC
COR402536	Construction	Kerr-McGee Gathering LLC
COR402538	Construction	Kerr-McGee Gathering LLC
COR402539	Construction	Kerr-McGee Gathering LLC
COR402535	Construction	Kerr-McGee Gathering LLC
COR402799	Construction	Lennar Colorado LLC
COR402188	Construction	High Valley Land Co Inc
COR401503	Construction	Edgewood Construction LLC
COR403243	Construction	Native Excavating Inc
COR400535	Construction	Bridgewater Homes LLC
COR400376	Construction	Beacon Construction LLC
COR404849	Construction	Vanguard Homes Inc

Permit ID	Permit Sector	Permittee
COG076383	Construction	Kraemer North America LLC
COR400578	Construction	Broadway Station Partners LLC
COR403337	Construction	NT North MFIQ LLC
COR405489	Construction	FCI Constructors Inc.
COR404172	Construction	Saint Aubyn Homes LLC
COR402540	Construction	Kerr McGee Gathering LLC
COR403572	Construction	Platte River Midstream Inc
COR402756	Construction	Lennar Colorado LLC
COG076597	Construction	American West Construction
COR405508	Construction	Overland Pass Pipeline Company LLC
COR400611	Construction	Buena Vista Builders Inc
COR405256	Construction	GLH Construction Inc.
COR403603	Construction	Prairie Center Metro Dist 3
COR405217	Construction	Oakwood Homes LLC
COR400652	Construction	CalAtlantic Group Inc
COR404693	Construction	Toll Southwest LLC
COR404535	Construction	Superior Town Center Metropolitan District 1
COR405146	Construction	Water Valley Land Company
COR404006	Construction	Ridgeline Homes LLC
COR404852	Construction	Vantage Homes Corp
COR403355	Construction	Oakwood Homes LLC
COR401687	Construction	Flatiron AECOM LLC
COR405901	Construction	Garney Construction
COR405909	Construction	Saunders Heath
COR404648	Construction	THB Superior MF LLC
COR404847	Construction	Vanguard Homes Inc
COR400668	Construction	Campbell Homes LLC
COR400667	Construction	Campbell Homes LLC
COR400159	Construction	American Legend Homes
COR401257	Construction	David Weekley Homes
COR401253	Construction	David Weekley Homes
COR400773	Construction	Colorado Department of Transportation
COR404478	Construction	Stephens Farm Investments LLC
COR406053	Construction	Lennar Colorado LLC
COR405734	Construction	Crow Creek Construction, LLC
COR401783	Construction	G and S Development Inc
COR402798	Construction	Lennar Colorado LLC
COR401361	Construction	DFH Mandarin LLC
COR402257	Construction	HT Canyons South Development LP
COR404338	Construction	Shea Homes LP
COR404158	Construction	Sage Homes LLC
COR404159	Construction	Sage Homes LLC

Permit ID	Permit Sector	Permittee
COR402124	Construction	Hartford Homes at Wildwing LLC
COR402121	Construction	Hartford Construction LLC
COR404827	Construction	Ursa Operating Co LLC
COR402425	Construction	Jefferson Center Metro Dist
COR402579	Construction	Kitchel Lake Partners LLC
COR400647	Construction	Caerus Piceance LLC
COR400641	Construction	Caerus Oil and Gas LLC
COR400645	Construction	Caerus Piceance LLC
COR400251	Construction	Artesio Lot Holdings LLC dba American Legend Homes
COR404647	Construction	THB SF LLC
COR401922	Construction	Gold Hill Neighborhood LLC
COR404143	Construction	Ryan Companies US Inc
COR400233	Construction	Archer Western Construction LLC
COR404175	Construction	Saint Aubyn Homes LLC
COR403614	Construction	PRI 2 LLC
COR400584	Construction	Brookfield Residential Colorado LLC
COR402801	Construction	Lennar Colorado LLC
COR404829	Construction	Ursa Operating Company LLC
COR404830	Construction	Ursa Operating Company LLC
COR403822	Construction	Ralph L Wadsworth Construction Co LLC
COR404341	Construction	Shea Homes LP
COR404342	Construction	Shea Homes LP
COR402053	Construction	GRVP LLC
COR404339	Construction	Shea Homes LP
COR404337	Construction	Shea Homes LP
COR405240	Construction	Hudick Excavating Inc
COR406478	Construction	Keller Homes Inc.
COR406218	Construction	Vanguard Homes Inc.
COR401921	Construction	Gold Hill Neighborhood LLC
COR404868	Construction	Longs Peak Resources, LLC
COR402571	Construction	Kiowa Park LLC
COR400213	Construction	AP Mountain States LLC
COR402520	Construction	KB Home Colorado Inc
COR401255	Construction	David Weekley Homes
COR404308	Construction	SH of Colorado Inc
COR404629	Construction	Terracina Custom Homes LLC
COR402995	Construction	Mckinney Classic 3 LLC
COR406222	Construction	Habitat Management, Inc.
COR403414	Construction	Outrigger DJ Operating LLC
COR404851	Construction	Vantage Homes Corp
COR405254	Construction	GLH Construction Inc.
COR402537	Construction	Kerr-McGee Gathering LLC

Permit ID	Permit Sector	Permittee
COR403818	Construction	Raindance Land Company LLC
COR400537	Construction	Bridgewater Homes LLC
COR401578	Construction	Epic Homes
COR403224	Construction	Nash Anthem LLC
COR405203	Construction	Lennar Colorado LLC
COR406642	Construction	Kiewit Infrastructure Co.
COR406149	Construction	Baessler Homes
COG076751	Construction	FlyWater, inc.
COR404177	Construction	Saint Aubyn Homes LLC
COR404179	Construction	Saint Aubyn Homes LLC
COR404354	Construction	Sheridan Station Transit Village LLC
COR406813	Construction	Toll Southwest LLC
COR402924	Construction	Marathon Land CO dba State Highway 7 Marketplace I
COR405169	Construction	Taylor Morrison of Colorado, Inc.
COR405448	Construction	The Broadmoor
COR402546	Construction	KF 103 CV LLC
COR402892	Construction	MA Mortenson Company
COR404336	Construction	Shea Homes LP
COR404343	Construction	Shea Homes LP
COR404853	Construction	Vantage Homes Corp
COR404701	Construction	Toll Co LP
COR403979	Construction	Richmond American Homes of Colorado Inc
COR405159	Construction	Haselden Construction
COR402953	Construction	Matuzak Builders LLC
COR406980	Construction	Water Valley Land Company
COR401742	Construction	New Vision Charter School
COR403075	Construction	Brookfield Residential
COR402995	Construction	Mckinney Classic 3 LLC
COR403788	Construction	Pulpit Rock Investments LLC
COR401752	Construction	Hover Community, Inc.
COR403716	Construction	Public Service Co of Colorado
COG076665	Construction	Pensam Development
COR406015	Construction	L&M Enterprises, Inc.
COR406922	Construction	Evergreen Industrial LTD
COR402085	Construction	Hall Irwin Corporation
COR402848	Construction	Lokal Homes LLC
COR402329	Construction	Infinity Home Collection at Castle Pines LLC
COR402327	Construction	Infinity Communities LLC
COR400376	Construction	Beacon Construction LLC
COR405240	Construction	Hudick Excavating Inc
COR404674	Construction	Timnath Ranch LLC
COR401083	Construction	Conestoga Developers Company LLC

Permit ID	Permit Sector	Permittee
COR403842	Construction	RE II Industrial II LLC
COR401605	Construction	EVT 7th and Sheridan LLC
COR406222	Construction	Habitat Management, Inc.
COR403243	Construction	Native Excavating Inc
COR403235	Construction	Nash Inspiration LLC
COR400208	Construction	AP Mountain States LLC
COR403931	Construction	Richmond American Homes of Colorado Inc
COR403940	Construction	Richmond American Homes of Colorado Inc
COR400641	Construction	Caerus Oil and Gas LLC
COR406554	Construction	Elite Properties of America, Inc.
COR403373	Construction	Oakwood Homes LLC
COR400938	Construction	Clayton Properties Group II
COR404179	Construction	Saint Aubyn Homes LLC
COR404177	Construction	Saint Aubyn Homes LLC
COR401257	Construction	David Weekley Homes
COR406760	Construction	Roche Constructors, Inc.
COR406548	Construction	Meritage Homes
COR407086	Construction	Robinson Construction Co
COR402327	Construction	Infinity Communities LLC
COR405738	Construction	Concrete Express, Inc.
COR403603	Construction	Prairie Center Metro Dist 3
COR403226	Construction	Nash Anthem LLC
COR406021	Construction	Gerrard Excavating Inc.
COR406019	Construction	Lennar Colorado LLC
COR403894	Construction	Reynolds Construction LLC
COR400240	Construction	ARCO Murray National Construction Co Inc
COR403890	Construction	Revolution 360 Owner LLC
COR400159	Construction	American Legend Homes
COR403818	Construction	Raindance Land Company LLC
COR404847	Construction	Vanguard Homes Inc
COR406250	Construction	Kiewit Infrastructure Co.
COR406298	Construction	Velocity Constructors, Inc.
COR406218	Construction	Vanguard Homes Inc.
COR401686	Construction	Flat Tops at Wildhorse Meadows LLC
COR404535	Construction	Superior Town Center Metropolitan District 1
COR403785	Construction	Pulpit Rock Investments LLC
COR404458	Construction	St Vrain Lakes Metropolitan District 1
COR400585	Construction	Brookfield Residential, LLC
COR400773	Construction	Colorado Department of Transportation
COR405146	Construction	Water Valley Land Company
COR402105	Construction	Broadway Station Partners LLC
COR400578	Construction	Broadway Station Partners LLC

Permit ID	Permit Sector	Permittee
COR407110	Construction	Integrity Homes
COR405667	Construction	Ridgeline Homes, LLC
COR402763	Construction	Lennar Colorado LLC
COR404172	Construction	Saint Aubyn Homes LLC
COR403026	Construction	Melody Homes Inc
COR403451	Construction	MA Mortenson Company
COR402520	Construction	KB Home Colorado Inc
COR404960	Construction	Weekley Homes LLC dba David Weekley Homes
COR406714	Construction	Public Service Company of Colorado
COR400647	Construction	Caerus Piceance LLC
COR406256	Construction	Brinkman Construction
COR407248	Construction	DSP Builders, Inc.
COR400073	Construction	ADES Design Builders
COR403373	Construction	Oakwood Homes LLC
COR401693	Construction	Larimer County
COR403940	Construction	Richmond American Homes of Colorado Inc
COR403956	Construction	Richmond American Homes of Colorado Inc
COR404160	Construction	Sage Meadow Townhomes LLC
COR406222	Construction	Habitat Management, Inc.
COR403282	Construction	NGL Water Solutions DJ LLC
COR402736	Construction	LC Home at Mariana Butte, LLC
COR404338	Construction	Shea Homes LP
COR400476	Construction	Boedecker Lake Partners LLC
COR402121	Construction	Hartford Construction LLC
COR402901	Construction	MA Mortenson Company
COR403955	Construction	Richmond American Homes of Colorado Inc
COR400880	Construction	Challenger Building LLC
COR401527	Construction	Elite Properties of America Inc
COR403051	Construction	Meritage Homes of Colorado Inc
COR404850	Construction	Grizzly Operating LLC
COR407395	Construction	High Country Homes
COR400884	Construction	Challenger Communities LLC
COR400213	Construction	AP Mountain States LLC
COR404647	Construction	THB SF LLC
COR402292	Construction	Hunters Crossing Investments LLC
COR406222	Construction	Habitat Management, Inc.
COR401096	Construction	Connell Resources Inc
COR406019	Construction	Lennar Colorado LLC
COR404179	Construction	Saint Aubyn Homes LLC
COR403229	Construction	Nash Inspiration LLC
COR403337	Construction	NT North MFIQ LLC
COR406404	Construction	Catamount Constructors Incorporated

Permit ID	Permit Sector	Permittee
COR404304	Construction	Severance Shores Investments LLC
COR407419	Construction	Grand Mesa Operating Company
COR402763	Construction	Lennar Colorado LLC
COR400077	Construction	Aerotropolis Area Coordinating Metro District
COR407361	Construction	AP Mountain States, LLC
COR405479	Construction	JB Homes LLC
COR403308	Construction	HEI Civil
COR406819	Construction	Bryan Construction Inc.
COR400586	Construction	Brookfield Residential Properties
COR400772	Construction	Mountain Valley Contracting
COR404304	Construction	Severance Shores Investments LLC
COR404478	Construction	Stephens Farm Investments LLC
COR405963	Construction	Rocky Mountain Midstream LLC
COG316022	Construction	FMP Construction, Inc.
COR401921	Construction	Gold Hill Neighborhood LLC
COR404887	Construction	Vintage Communities Inc
COR404848	Construction	Vanguard Homes Inc
COR406932	Construction	BVB General Contractors
COR402795	Construction	Lennar Colorado LLC
COR406230	Construction	Integrity Homes
COR402792	Construction	Lennar Colorado LLC
COR400653	Construction	CalAtlantic Homes, Inc.
COR405180	Construction	Lennar Colorado LLC
COR402777	Construction	Lennar Colorado LLC
COR401908	Construction	GLH Construction Inc
COR404589	Construction	Taylor Morrison of Colorado Inc
COR404849	Construction	Vanguard Homes Inc
COR402425	Construction	Jefferson Center Metro Dist
COR407381	Construction	Intermountain Rural Electric Association
COR401361	Construction	DFH Mandarin LLC
COR400533	Construction	Bridgewater Homes LLC
COR407176	Construction	Saint Aubyn Homes, LLC
COR407092	Construction	Public Service Company of Colorado
COR405254	Construction	GLH Construction Inc.
COR404304	Construction	Severance Shores Investments LLC
COR403226	Construction	Nash Anthem LLC
COR407623	Construction	Thunderpup Construction, Inc.
COR405734	Construction	Crow Creek Construction, LLC
COR401674	Construction	Hines
COR401673	Construction	Hines
COR403850	Construction	Red Hawk Petroleum LLC
COR406117	Construction	Richmond American Homes of Colorado Inc.

Permit ID	Permit Sector	Permittee
COR405451	Construction	Lennar Colorado LLC
COR407453	Construction	Colorado Structures Inc.
COR402505	Construction	KB Home Colorado Inc
COR406222	Construction	Habitat Management, Inc.
COR404343	Construction	Shea Homes LP
COR403224	Construction	Nash Anthem LLC
COR403226	Construction	Nash Anthem LLC
COR402329	Construction	Infinity Home Collection at Castle Pines LLC
COR401334	Construction	Denver High Point at DIA Metro District
COR402327	Construction	Infinity Communities LLC
COR400582	Construction	Brookfield (Colorado) Management LLC dba Barefoot
COR404398	Construction	Solterra Residential LLC
COR403060	Construction	Meritage Homes of Colorado, Inc.
COR403955	Construction	Richmond American Homes of Colorado Inc
COR404339	Construction	Shea Homes LP
COR403235	Construction	Nash Inspiration LLC
COR405169	Construction	Taylor Morrison of Colorado, Inc.
COR405599	Construction	Richmond American Homes of Colorado
COR403049	Construction	Meritage Homes of Colorado Inc
COR403308	Construction	HEI Civil
COR406502	Construction	Lennar Colorado, LLC
COR402806	Construction	Lennar Colorado LLC
COR403899	Construction	Reynolds Construction LLC
COR402901	Construction	MA Mortenson Company
COR407621	Construction	AP Mountain States, LLC
COR403960	Construction	Richmond American Homes of Colorado, Inc.
COR407868	Construction	Oakwood Homes, LLC
COR400534	Construction	Bridgewater Homes, LLC
COR407645	Construction	Aspen View Homes
COR403818	Construction	Raindance Land Company LLC
COR403931	Construction	Richmond American Homes of Colorado Inc
COR403226	Construction	Nash Anthem LLC
COR403955	Construction	Richmond American Homes of Colorado Inc
COR407876	Construction	MNR, LLC
COR402053	Construction	GRVP LLC
COR402506	Construction	KB Home Colorado, Inc.
COR406334	Construction	Taylor Morrison of Colorado Inc
COR403225	Construction	Nash Anthem LLC
COR405508	Construction	Overland Pass Pipeline Company LLC
COR404890	Construction	Vision Development Inc
COR404059	Construction	Roche Constructors Inc
COR406904	Construction	Center for Strategic Ministry

Permit ID	Permit Sector	Permittee
COR405667	Construction	Ridgeline Homes, LLC
COR402105	Construction	Broadway Station Partners LLC
COR402077	Construction	Habitat for Humanity Mesa County
COR403961	Construction	Richmond American Homes of Colorado, Inc.
COR403941	Construction	Richmond American Homes of Colorado, Inc.
COR400159	Construction	American Legend Homes
COR404336	Construction	Shea Homes LP
COR406322	Construction	Connell Resources, Inc.
COR401361	Construction	DFH Mandarin LLC
COR404342	Construction	Shea Homes LP
COR402520	Construction	KB Home Colorado Inc
COR406478	Construction	Keller Homes Inc.
COR403236	Construction	Nash Inspiration LLC
COR407882	Construction	Dwire Earthmoving, LLC
COR407864	Construction	Toll Southwest, LLC
COR402515	Construction	KB Home Colorado, Inc.
COR402517	Construction	KB Home Colorado Inc
COR404345	Construction	Shea Properties LLC
COR402995	Construction	Mckinney Classic 3 LLC
COR405451	Construction	Lennar Colorado LLC
COR403931	Construction	Richmond American Homes of Colorado Inc
COR405180	Construction	Lennar Colorado LLC
COR404220	Construction	Saunders Construction LLC
COR408046	Construction	ColoCorp Builders, LLC
COR402505	Construction	KB Home Colorado Inc
COR401922	Construction	Gold Hill Neighborhood LLC
COR403226	Construction	Nash Anthem LLC
COR407571	Construction	Lennar Colorado LLC
COR404847	Construction	Vanguard Homes Inc
COR400891	Construction	Challenger Homes Inc
COR402983	Construction	McCauley Constructors Inc
COR407122	Construction	Colorado Structures Inc.
COR402437	Construction	JHL Constructors Inc
COR401747	Construction	Deer Trail School District 26J
COR402546	Construction	KF 103 CV LLC
COR401117	Construction	Constructors West Inc
COR402155	Construction	Hensel Phelps Construction Co
COR402801	Construction	Lennar Colorado LLC
COR404852	Construction	Vantage Homes Corp
COR404324	Construction	Shaw Construction LLC
COR400585	Construction	Brookfield Residential, LLC
COR405879	Construction	Mortenson Construction

Permit ID	Permit Sector	Permittee
COR404143	Construction	Ryan Companies US Inc
COR403941	Construction	Richmond American Homes of Colorado, Inc.
COR404340	Construction	Shea Homes LP
COR406498	Construction	Brinkman Construction Inc
COR407603	Construction	Roche Constructors, Inc.
COR403727	Construction	Public Service Co of Colorado
COR401058	Construction	Concrete Express Inc
COR403787	Construction	Pulpit Rock Investments LLC
COR402257	Construction	HT Canyons South Development LP
COR405768	Construction	Crow Creek Construction LLC
COR400533	Construction	Bridgewater Homes LLC
COR405551	Construction	KB Home Colorado Inc
COR407110	Construction	Integrity Homes
COR400206	Construction	Brush RE-2(J)
COR404172	Construction	Saint Aubyn Homes LLC
COR405221	Construction	Saint Aubyn Homes LLC
COR405510	Construction	Catamount Constructors Inc
COR403360	Construction	Oakwood Homes
COR403362	Construction	Oakwood Homes LLC
COR403352	Construction	Oakwood Homes LLC
COR404338	Construction	Shea Homes LP
COR404340	Construction	Shea Homes LP
COR406029	Construction	LGI Homes Colorado LLC
COR401829	Construction	Gateway North Holdings LLC
COR407767	Construction	AP Mountain States, LLC
COR403361	Construction	Oakwood Homes LLC
COR406978	Construction	High Valley Land Company, Inc.
COR406019	Construction	Lennar Colorado LLC
COR403366	Construction	Oakwood Homes LLC
COR401578	Construction	Epic Homes
COR406149	Construction	Baessler Homes
COR402571	Construction	Kiowa Park LLC
COR403230	Construction	Nash Inspiration LLC
COR403233	Construction	Nash Inspiration LLC
COR400493	Construction	Boulder County
COR402506	Construction	KB Home Colorado, Inc.
COR403060	Construction	Meritage Homes of Colorado, Inc.
COR403055	Construction	Meritage Homes of Colorado Inc
COR406988	Construction	Meritage Homes of Colorado, Inc.
COR404694	Construction	Toll Co LP
COR406866	Construction	Reynolds Construction LLC
COR405486	Construction	Dream Finders Homes, LLC

Permit ID	Permit Sector	Permittee
COR405222	Construction	Saint Aubyn Homes LLC
COR400792	Construction	Graham Contracting Ltd
COR408268	Construction	AP Mountain States, LLC
COR404851	Construction	Vantage Homes Corp
COR407599	Construction	AP Mountain States, LLC
COR405479	Construction	JB Homes LLC
COR408324	Construction	Murray and Stafford, Inc.
COR405322	Construction	Duckels Construction, Inc.
COR406316	Construction	GH Phipps Construction
COR404535	Construction	Superior Town Center Metropolitan District 1
COR408292	Construction	Tri Pointe Homes, Inc.
COR404853	Construction	Vantage Homes Corp
COR400198	Construction	AP Mountain States LLC
COR405843	Construction	Fransen Pittman General Contractors
COR408078	Construction	Kaegebein Fine Homebuilding
COR406480	Construction	AP Mountain States, LLC
COR403060	Construction	Meritage Homes of Colorado, Inc.
COR400632	Construction	C & C Land LLC
COR406316	Construction	GH Phipps Construction
COR403788	Construction	Pulpit Rock Investments LLC
COR408493	Construction	HPM, Inc.
COR402130	Construction	Haselden Construction
COR407633	Construction	Colarelli Construction Inc.
COR401783	Construction	G and S Development Inc
COR408130	Construction	BEMAS Construction
COR408186	Construction	Public Service Company of Colorado
COR403001	Construction	Equity Ventures Commercial, Inc.
COR403944	Construction	Richmond American Homes of Colorado Inc
COR402329	Construction	Infinity Home Collection at Castle Pines LLC
COR404332	Construction	Shaw Ltd
COR402579	Construction	Kitchel Lake Partners LLC
COR404852	Construction	Vantage Homes Corp
COR406786	Construction	Lennar Colorado LLC
COR404847	Construction	Vanguard Homes Inc
COR402033	Construction	Great Western Operating Co LLC
COR405959	Construction	Fransen Pittman General Contractors, Inc.
COR407479	Construction	Windsor Ridge Homes
COR403522	Construction	PetroShare Corp.
COR404535	Construction	Superior Town Center Metropolitan District 1
COR405833	Construction	UP 18, LLC
COR402752	Construction	Lennar Colorado LLC
COR405515	Construction	Rago Enterprises, LLC

Permit ID	Permit Sector	Permittee
COR403375	Construction	Oakwood Homes LLC
COR406161	Construction	Ames Construction
COR406218	Construction	Vanguard Homes Inc.
COR404159	Construction	Sage Homes LLC
COR403861	Construction	Redlands Investment Properties LLC
COR405241	Construction	Interquest Marketplace LLC
COR408130	Construction	BEMAS Construction
COR404385	Construction	SLV Castle Oaks LLC
COR404308	Construction	SH of Colorado Inc
COR402520	Construction	KB Home Colorado Inc
COR407078	Construction	AMH Development, LLC
COR405381	Construction	Longs Peak Dairy, LLC
COR400254	Construction	Arvada Residential Partners LLC
COR400920	Construction	Cimarron Metro District
COR401922	Construction	Gold Hill Neighborhood LLC
COR404340	Construction	Shea Homes LP
COR405510	Construction	Catamount Constructors Inc
COG076704	Construction	Garney Construction
COR402121	Construction	Hartford Construction LLC
COR406819	Construction	Bryan Construction Inc.
COR405599	Construction	Richmond American Homes of Colorado
COR403243	Construction	Native Excavating Inc
COR404343	Construction	Shea Homes LP
COR401254	Construction	David Weekley Homes
COR408090	Construction	Connell Resources, Inc.
COR405169	Construction	Taylor Morrison of Colorado, Inc.
COR407096	Construction	David Weekley Homes
COR404158	Construction	Sage Homes LLC
COR400233	Construction	Archer Western Construction LLC
COR400652	Construction	CalAtlantic Group Inc
COR400554	Construction	Brinkman Construction Inc
COR408088	Construction	Connell Resources, Inc.
COR406358	Construction	Tri-State Generation and Transmission Association, Inc.
COR404172	Construction	Saint Aubyn Homes LLC
COR404458	Construction	St Vrain Lakes Metropolitan District 1
COR401409	Construction	Dream Finders Homes LLC
COR406063	Construction	Taylor Morrison of Colorado Inc
COR403954	Construction	Richmond American Homes of Colorado Inc
COR407858	Construction	Reynolds Construction, LLC
COR406839	Construction	Concrete Express, Inc.
COR404900	Construction	Wagons West LLC
COR403815	Construction	Rain Tree Investment Corporation.

Permit ID	Permit Sector	Permittee
COR403899	Construction	Reynolds Construction LLC
COR408783	Construction	Fransen Pittman Construction
COR404887	Construction	Vintage Communities Inc
COR400413	Construction	Berthoud Homes LLC
COR407800	Construction	Namaste Solar
COR403308	Construction	HEI Civil
COR409182	Construction	Hyder Construction
COR407441	Construction	Village Capital Corporation
COR403788	Construction	Pulpit Rock Investments LLC
COR403741	Construction	Carlson Associates
COR407273	Construction	Hamilton Construction
COR406819	Construction	Bryan Construction Inc.
COR404339	Construction	Shea Homes LP
COR407645	Construction	Aspen View Homes
COR404693	Construction	Toll Southwest LLC
COR401453	Construction	Eagle Development Co
COR401456	Construction	Eagle Development Co
COR404852	Construction	Vantage Homes Corp
COR400159	Construction	American Legend Homes
COR407607	Construction	American West Construction, LLC
COR402546	Construction	KF 103 CV LLC
COR405955	Construction	Epic Homes
COR403981	Construction	Richmond American Homes of Colorado Inc
COR403308	Construction	HEI Civil
COR400713	Construction	Catamount Constructors Inc
COR408575	Construction	AP Mountain States, LLC
COR400537	Construction	Bridgewater Homes LLC
COR400533	Construction	Bridgewater Homes LLC
COR404853	Construction	Vantage Homes Corp
COR401765	Construction	Front Range Investment Holdings LLC
COR400210	Construction	AP Mountain States LLC
COR402504	Construction	KB Home Colorado Inc
COR408877	Construction	DCB Construction Company, Inc.
COR406149	Construction	Baessler Homes
COR405891	Construction	KB Home Colorado, Inc
COR403818	Construction	Raindance Land Company LLC
COR404851	Construction	Vantage Homes Corp
COR404847	Construction	Vanguard Homes Inc
COR401446	Construction	Eagle Crossing Development Inc
COR404806	Construction	United Properties
COR403931	Construction	Richmond American Homes of Colorado Inc
COR403049	Construction	Meritage Homes of Colorado Inc

Permit ID	Permit Sector	Permittee
COR407190	Construction	Meritage Homes
COR403054	Construction	Meritage Homes of Colorado Inc
COR406404	Construction	Catamount Constructors Incorporated
COR408326	Construction	Reynolds Construction, LLC
COR405835	Construction	HLCC Construction Company
COR401880	Construction	Gilliland Family Partnership LLP
COR403226	Construction	Nash Anthem LLC
COR408922	Construction	Facilities Contracting, Inc.
COR404433	Construction	WE O'Neil Construction Company of Colorado
COR402571	Construction	Kiowa Park LLC
COR403360	Construction	Oakwood Homes
COR403354	Construction	Oakwood Homes LLC
COR407868	Construction	Oakwood Homes, LLC
COR402292	Construction	Hunters Crossing Investments LLC
COR406801	Construction	Mark young Construction, Inc
COR408821	Construction	Homes by Creekstone Builders, LLC
COR402506	Construction	KB Home Colorado, Inc.
COR403060	Construction	Meritage Homes of Colorado, Inc.
COR405169	Construction	Taylor Morrison of Colorado, Inc.
COR401150	Construction	Coyote Ridge Construction LLC
COR409294	Construction	AP Mountain States, LLC
COR408747	Construction	Saint Aubyn Homes LLC
COR402327	Construction	Infinity Communities LLC
COR402292	Construction	Hunters Crossing Investments LLC
COR406502	Construction	Lennar Colorado, LLC
COR408405	Construction	Horizon View Homes LLC
COR408753	Construction	ACC Metropolitan District
COR407184	Construction	Hargrave Construction Inc.
COR409492	Construction	Gerrard Excavating Inc.
COR408383	Construction	Byler Snell Homes L.L.P
COR402546	Construction	KF 103 CV LLC
COR402240	Construction	Horizon View Homes LLC
COR408869	Construction	Reynolds Construction
COR402292	Construction	Hunters Crossing Investments LLC
COR409687	Construction	Zayo Group
COR408264	Construction	Zak Dirt
COR400538	Construction	Brighton City of
COR405748	Construction	Richmond American Homes of Colorado, Inc.
COR404308	Construction	SH of Colorado Inc
COR401723	Construction	Fossil Ridge Holdings LLC
COR409416	Construction	Golden Triangle Construction
COR409685	Construction	Structures, Inc.

Permit ID	Permit Sector	Permittee
COR405479	Construction	JB Homes LLC
COR403931	Construction	Richmond American Homes of Colorado Inc
COR408292	Construction	Tri Pointe Homes, Inc.
COR404847	Construction	Vanguard Homes Inc
COR405551	Construction	KB Home Colorado Inc
COR408112	Construction	Public Service Company of Colorado
COR408110	Construction	Public Service Company of Colorado
COR403375	Construction	Oakwood Homes LLC
COR408268	Construction	AP Mountain States, LLC
COR409342	Construction	M.A. Mortenson Company
COR403055	Construction	Meritage Homes of Colorado Inc
COR408112	Construction	Public Service Company of Colorado
COR407048	Construction	TRI Pointe Homes Inc
COR400073	Construction	ADES Design Builders
COR405217	Construction	Oakwood Homes LLC
COR401173	Construction	Creekside Development LLC
COR403006	Construction	Melcor TC Aurora
COR408719	Construction	JHL Constructors, Inc.
COR405257	Construction	FCI Constructors, Inc.
COR403865	Construction	Brinkmann Constructors
COR401083	Construction	Conestoga Developers Company LLC
COR408326	Construction	Reynolds Construction, LLC
COR405955	Construction	Epic Homes
COR403308	Construction	HEI Civil
COG315603	Construction	Schnitzer West, LLC
COR408292	Construction	Tri Pointe Homes, Inc.
COR408326	Construction	Reynolds Construction, LLC
COR408268	Construction	AP Mountain States, LLC
COR402269	Construction	Hudick Excavating Inc
COR406117	Construction	Richmond American Homes of Colorado Inc.
COR402780	Construction	Lennar Colorado LLC
COR405256	Construction	GLH Construction Inc.
COR402798	Construction	Lennar Colorado LLC
COR405317	Construction	The Denver Hospice
COR400475	Construction	BNSF Railway Co
COR405256	Construction	GLH Construction Inc.
COR405256	Construction	GLH Construction Inc.
COR402274	Construction	Painted Prairie Metropolitan District Nos. 1-12
COR406980	Construction	Water Valley Land Company
COR402546	Construction	KF 103 CV LLC
COR407479	Construction	Windsor Ridge Homes
COR400668	Construction	Campbell Homes LLC

Permit ID	Permit Sector	Permittee
COR404593	Construction	Taylor Morrison of Colorado Inc
COR407767	Construction	AP Mountain States, LLC
COR401165	Construction	CR Loveland Investments LLC
COR400880	Construction	Challenger Building LLC
COR401446	Construction	Eagle Crossing Development Inc
COR406370	Construction	Eagle Crossing Windsor
COR406326	Construction	Baseline Metropolitan District
COR406029	Construction	LGI Homes Colorado LLC
COR401765	Construction	Front Range Investment Holdings LLC
COR404629	Construction	Terracina Custom Homes LLC
COR410011	Construction	Saint Aubyn Homes LLC
COR400506	Construction	Boulder Creek Neighborhoods LLC
COR403932	Construction	Richmond American Homes of Colorado Inc
COR405197	Construction	Lokal Homes LLC
COR409294	Construction	AP Mountain States, LLC
COR410049	Construction	Asphalt Specialties
COR409512	Construction	Koelbel and Company
COR405963	Construction	Rocky Mountain Midstream LLC
COR400884	Construction	Challenger Communities LLC
COR408038	Construction	Centerra Metropolitan District
COR404590	Construction	Taylor Morrison of Colorado Inc
COR404535	Construction	Superior Town Center Metropolitan District 1
COR404304	Construction	Severance Shores Investments LLC
COR402239	Construction	Horizon View Homes LLC
COR409040	Construction	HEI Civil
COR405089	Construction	Wyatt Construction Co Inc
COR404853	Construction	Vantage Homes Corp
COR406813	Construction	Toll Southwest LLC
COR410041	Construction	Public Service Company of Colorado (PSCo)
COR409390	Construction	Connell Resources, Inc
COR405366	Construction	Toll Southwest LLC
COR406786	Construction	Lennar Colorado LLC
COR409396	Construction	Sampson Construction Co., Inc.
COR403954	Construction	Richmond American Homes of Colorado Inc
COR404069	Construction	CMC Group, Inc.
COR407603	Construction	Roche Constructors, Inc.
COR406980	Construction	Water Valley Land Company
COR402506	Construction	KB Home Colorado, Inc.
COR407088	Construction	Infinity Communities, Inc.
COR409924	Construction	HEI Civil
COR405551	Construction	KB Home Colorado Inc
COR408821	Construction	Homes by Creekstone Builders, LLC

Permit ID	Permit Sector	Permittee
COR408947	Construction	Richmond American Homes of Colorado, Inc.
COR402505	Construction	KB Home Colorado Inc
COG080077	Construction	Mountain Valley Contracting
COG860047	Pesticides	Larimer County
COR090100	MS4	Mesa County
COR090000	MS4	Louisville City of

Appendix C Permit backlog detail

Permit backlog information used to generate figures in 2020 HB17-1285 report.

Appendix C Additional Metrics Information

Table C-1 Summary of backlogged permits by permit type

Permit Type	No. of backlogged permits	No. of current permits	Total	Percent of backlogged permits
Groundwater Process Water Individual Permits				
Backlogged permits as of Sept. 30, 2017	15	4	19	79%
Backlogged permits as of Sept. 30, 2018	13	5	18	72%
Backlogged permits as of Sept. 30, 2019	14	3	17	82%
Backlogged permits as of Sept. 30, 2020	11	1	12	92%
Groundwater Process Water General Permits				
Backlogged permits as of Sept. 30, 2017	135	0	135	100%
Backlogged permits as of Sept. 30, 2018	129	7	136	95%
Backlogged permits as of Sept. 30, 2019	88	45	133	66%
Backlogged permits as of Sept. 30, 2020	54	80	134	40%
Pesticides Application General Permit				
Backlogged permits as of Sept. 30, 2017	0	73	73	0%
Backlogged permits as of Sept. 30, 2018	0	75	75	0%
Backlogged permits as of Sept. 30, 2019	0	76	76	0%
Backlogged permits as of Sept. 30, 2020	0	79	79	0%
Surface Water Stormwater Individual Permits				
Backlogged permits as of Sept. 30, 2017	5	2	7	71%
Backlogged permits as of Sept. 30, 2018	6	1	7	86%
Backlogged permits as of Sept. 30, 2019	6	1	7	86%
Backlogged permits as of Sept. 30, 2020	6	1	7	86%
Surface Water Individual Permits				
Backlogged permits as of Sept. 30, 2017	123	245	368	33%
Backlogged permits as of Sept. 30, 2018	138	242	380	36%
Backlogged permits as of Sept. 30, 2019	145	238	383	38%
Backlogged permits as of Sept. 30, 2020	163	219	382	43%

Surface Water Process Water General Permits				
Backlogged permits as of Sept. 30, 2017	296	1,163	1,459	20%
Backlogged permits as of Sept. 30, 2018	291	1,091	1,382	21%
Backlogged permits as of Sept. 30, 2019	855	654	1,509	57%
Backlogged permits as of Sept. 30, 2020	714	624	1338	53%
Surface Water Stormwater General Permits				
Backlogged permits as of Sept. 30, 2017	4,659	884	5,543	84%
Backlogged permits as of Sept. 30, 2018	5,792	61	5,843	99%
Backlogged permits as of Sept. 30, 2019	1,068	5,206	6,274	17%
Backlogged permits as of Sept. 30, 2020	1,064	5,425	6,489	16%
Total				
Backlogged permits as of Sept. 30, 2017	5,233	2,371	7,604	69%
Backlogged permits as of Sept. 30, 2018	6,369	1,482	7,851	81%
Backlogged permits as of Sept. 30, 2019	2,176	6,223	8,399	26%
Backlogged permits as of Sept. 30, 2020	2,012	6,429	8,441	24%

Table C-2 Summary of backlogged permits by sector

Permit Type	No. of backlogged permits	No. of current permits	Total	Percent of backlogged permits
Commerce and Industry				
Backlogged permits as of Sept. 30, 2017	288	1,594	1,882	15%
Backlogged permits as of Sept. 30, 2018	1,164	763	1,927	60%
Backlogged permits as of Sept. 30, 2019	1,300	681	1,981	66%
Backlogged permits as of Sept. 30, 2020	1,279	664	1,943	66%
Construction				
Backlogged permits as of Sept. 30, 2017	4,572	312	4,884	94%
Backlogged permits as of Sept. 30, 2018	4,832	257	5,089	95%
Backlogged permits as of Sept. 30, 2019	391	5,191	5,582	7%
Backlogged permits as of Sept. 30, 2020	262	5,490	5,752	5%
Municipal Separate Storm Sewer System				
Backlogged permits as of Sept. 30, 2017	65	59	124	52%
Backlogged permits as of Sept. 30, 2018	65	60	125	52%
Backlogged permits as of Sept. 30, 2019	65	60	125	52%
Backlogged permits as of Sept. 30, 2020	66	60	126	52%
Pesticides				
Backlogged permits as of Sept. 30, 2017	0	73	73	0%
Backlogged permits as of Sept. 30, 2018	0	75	75	0%
Backlogged permits as of Sept. 30, 2019	0	76	76	0%
Backlogged permits as of Sept. 30, 2020	0	79	79	0%
Public and Private Utilities				
Backlogged permits as of Sept. 30, 2017	308	333	641	48%
Backlogged permits as of Sept. 30, 2018	310	325	635	49%
Backlogged permits as of Sept. 30, 2019	420	215	635	66%
Backlogged permits as of Sept. 30, 2020	405	233	638	63%
Total				
Backlogged permits as of Sept. 30, 2017	5,233	2,371	7,604	69%

Backlogged permits as of Sept. 30, 2018	6,369	1,482	7,851	81%
Backlogged permits as of Sept. 30, 2019	2,176	6,223	8,399	26%
Backlogged permits as of Sept. 30, 2020	2,012	6,429	8,441	24%