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STATE OF COLORADO
DEPARTMENT OF LAW

AGENDA

Colorado Natural Resources Trustees Meeting

August 25, 2026, 10:30 a.m. - 12:00 p.m.

Location:
Rio Grande Water Conservation District
8805 Independence Way, Alamosa

Note: A hyperlink to a Microsoft Teams meeting will be posted on the Trustee website:
Colorado Natural Resources Trustees Upcoming Meetings

Open Session

1. Approve Agenda – 1 minute

2. Approval of Minutes from May 13, 2026 Meeting – 1 minute

   Action Item:
   Review and approve minutes from May 13, 2026 meeting

   Document:
   (1) Draft minutes from May 13, 2026 meeting

3. Budget Update – (Jennifer Talbert) - 1 minute

   Action Items: None

   Document:
   (1) Budget Spreadsheet

4. Recent Investigations – (Mindi May) – 5 minutes

   Action Items: None

   Documents: None

5. Uravan Closeout Presentation from West End Economic Development Corporation – (Jennifer Talbert) – 15 minutes

   Action Items: None

   Documents: None

6. Home Lake State Wildlife Area – (Shelley Hickerson, Lauren Bonura, Mindi May) – 5 minutes

   Action Items: None

   Documents: None

7. Natural Resource Damages New Type A Regulations – (David Kreutzer) – 10 minutes

   Action Items: None

   Document:
   (1) State of Colorado Comments on Department of Interior Proposed Rule on Natural Resource Damage Type A Regulations

Executive Session

8. Bishop Well/Galeton – (Shelley Hickerson, Lauren Bonura, Mindi May) – 5 minutes

   Action Items: None

   Documents: None

9. Gunnison River Train Derailment – (David Banas, Lauren Bonura, Mindi May) – 5 minutes

   Action Items: None

   Documents: None

10. Douglas Creek – (Jonathan Lubrano, Lauren Bonura, Mindi May) – 5 minutes

    Action Items: None

    Documents: None

11. Pueblo Oil Spill – (Jonathan Lubrano, Lauren Bonura, Mindi May) – 5 minutes

    Action Items: None

    Documents: None

Open Session

12. Report from Executive Session – (Lukas Staks) – 1 minute

    Action Items: None

    Documents: None

13. Introduction to Site Visit – (Jennifer Talbert) – 5 minutes

    Action Items: None

    Documents: None

ITEM #2

Colorado Natural Resource Damages (NRDs) Trustees
Meeting Minutes
May 13, 2026
(Approved ________________)

Attendance

Trustees
Shannon Stevenson, Solicitor General for the State of Colorado
Dan Gibbs, Executive Director, Colorado Department of Natural Resources (DNR)
Tracie White, Hazardous Materials and Waste Management Division Director, Colorado Department of Public Health and Environment (CDPHE)

Trustee Staff
Lukas Staks, Senior Assistant Attorney General, Office of the Attorney General, Natural Resources and Environment Section (NRE)
David Kreutzer, First Assistant Attorney General, NRE
David Banas, Senior Assistant Attorney General, NRE
Jason King, Senior Assistant Attorney General, NRE
Shelley Hickerson, Assistant Attorney General, NRE
Jonathon Lubrano, Assistant Attorney General, NRE
Jennifer Talbert, Remediation Program Manager, CDPHE
Lauren Bonura, Project Manager, CDPHE
Maura McGovern, Water Resources Section Manager, DNR
Ashley Rust, Water Quality Monitoring and Assessment Specialist, DNR

Other State Staff
Laura Kelly, Senior Paralegal, NRE
April Polinauskas, Administrative Assistant, NRE

Fellows and Interns
Taylor Schultz, DNR Intern

Public
Rachel Hutchens, Bluff Lake Nature Center
Tess Robeson, Bluff Lake Nature Center

Open Session

Trustee Stevenson called the Trustee Meeting to order at approximately 8:30 a.m. on May 13, 2026 (held in the Carr Building and via Teams). The meeting's purpose was to brief the Trustees on the current status of issues relating to natural resource restoration projects, and to request direction and/or approval for various actions.

Agenda
Trustee Gibbs moved to approve the Agenda. Trustee White seconded the motion and the motion was unanimously approved.

Minutes
Trustee Gibbs moved to approve the February 10, 2026 minutes. Trustee White seconded the motion, and the motion was unanimously approved.

Budget Update
Jennifer Talbert presented the budget update, noting no major changes and adding that the Home Lake funds had not been added to the spreadsheet because payment had not yet been received.

Recent Investigations
Ashley Rust reported a gasoline tanker rollover on March 17, 2026, where I-25 crosses the Arkansas River in Pueblo spilling 8,000 gallons, 5,000 gallons of which went into the river. Thanks to CPW's aquatic biologists already stationed nearby for a walleye spawn, water samples and dead fish were collected and counted quickly. Additional sediment and water sampling followed. This incident will likely proceed as a state-only NRDs claim and may involve further discussion in executive session.

Standard Metals – Gossan Restoration Project
Jennifer Talbert provided an update on the Gossan Restoration Project which was approved by the Trustees in 2022 and required the Coal Creek Watershed Coalition to enter into a contract with CDPHE before December 9, 2025. She explained that the required U.S. Forest Service NEPA review had been delayed partially because of staffing reductions, budget cuts, and wildfire impacts that took priority over NEPA reviews. Given strong community support and the ongoing need for a NEPA review, Staff recommended that the Trustees extend the contract window by five more years.

Trustee Gibbs moved that the Trustees approve the resolution extending the deadline for the Coal Creek Watershed Coalition to enter into a contract with CDPHE for the Gossan Restoration Project to May 12, 2031. Trustee White seconded the motion and the motion was unanimously approved.

Rocky Mountain Arsenal - Closeout Presentation from Bluff Lake Nature Center
David Banas introduced Rachel Hutchens and Tess Robeson from the Bluff Lake Nature Center who presented a detailed closeout report for their Rocky Mountain Arsenal Aquatic Habitat Improvement Project. Highlights included:

- Restoration work improving lake hydrology and habitat beginning in 2016–17.
- Completion of a slurry wall, dredging, and lake recontouring leading to a now consistently full lake, a significant improvement over the previously dry months.

- Development of a long-term water rights and augmentation plan with Denver Water, supported by engineering analyses, legal filings, and automated monitoring systems.
- Extensive in-kind support from Denver Water and volunteers, and future ongoing water-fee obligations that Bluff Lake is now financially positioned to handle.

The proponents highlighted their 123-acre refuge, educational programs, and major habitat improvements, inviting the Trustees to visit and potentially use their new meeting facilities.

Executive Session

Senior AAG Lukas Staks recommended the Trustees make a motion to go into Executive Session to consider Agenda Items #7 (Home Lake State Wildlife Area); #8 (Bishop Well/Galeton); #9 (Gunnison River Train Derailment); #10 (Douglas Creek); and #11 (Pueblo Oil Spill). He stated the Trustees are authorized to enter Executive Session pursuant to Colorado Revised Statutes section 24-6-402(3)(a)(II) and other laws that allow the Trustees to enter Executive Session for specific purposes. At approximately 9:00 a.m., Trustee Gibbs moved to begin an Executive Session to discuss Agenda Items #7-11. Trustee White seconded the motion, and the motion was unanimously approved. Trustee Stevenson recused herself from consideration of Agenda Item #8 (Bishop Well/Galeton) due to a potential conflict of interest and left the room during that discussion.

Open Session

At approximately 9:25 a.m., Trustee Gibbs stated that the Trustees had concluded Executive Session, discussion between the Trustees and their staff and legal counsel was limited to privileged attorney-client communication about Agenda Items #7-11. This communication was separately recorded. The discussion during Executive Session was limited to those items and no formal action was taken.

The final agenda item was the presentation of the Shattuck Chemical and Denver Radium Superfund Site Video (opens new YouTube tab) produced by the U.S. Department of the Interior and introduced by David Banas and Jennifer Talbert. (Please note that the video's audio begins 18 seconds after the start of the video.)

David Banas thanked Administrative Assistant April Polinauskis for providing technological support for the meetings and leading efforts to meet updated state digital-accessibility requirements. Additionally, Tracie White authorized Jennifer Talbert to sign the Gossan Restoration Project resolution for her.

At approximately 9:45 a.m., Trustee Gibbs moved to adjourn the meeting. Trustee White seconded the motion, and the motion was unanimously approved.

ITEM #3

Natural Resource Damages Accounts

NRD Matter	**Bonita Peak**	**California Gulch**	**Fountain Creek**	**Home Lake**	**Idarado**	**Lowry**	**N. St. Vrain**
Total Settlement	$6,600,000.00	$10,000,000.00	$345,000.00	$100,000.00	$1,000,000.00	$1,606,930.00	$245,305.00
Total NRD dollars spent	$88,343.50	$16,480,812.82	$0.00	$0.00	$1,561,412.98	$1,942,902.80	$0.00
Account Balance 8/7/2026	**$6,878,211.75**	**$2,883,950.79**	**$391,905.94**	**$100,000.00**	**$219,362.96**	**$162,812.21**	**$261,484.78**
Most recent TT Resolution Date	2/10/2026	11/14/2023	4/23/2019	NA	11/14/2024	8/14/2023	NONE
Current Trustee awarded amount	$3,500,000.00	$3,953,875.00	$389,638.01	NA	$218,746.75	$675,000.00	$250,000.00
Contract Encumbrances	**$0.00**	**$2,566,872.53**	**$391,905.94**	**$0.00**	**$219,362.96**	**$114,503.22**	**$250,000.00**
Ending balance	**$6,878,211.75**	**$317,078.26**	**$0.00**	**$100,000.00**	**$0.00**	**$48,308.99**	**$11,484.78**
Type of Restriction	Restoration Plan required	Follow State and USFWS Restoration Plans	None	None	None	Groundwater nexus to the South Platte	None
Remaining funds available	$239K from Blue Tee will be added from the HSRF in Phase 2.	Remaining funds available	**No remaining funds available**	Remaining funds available	Interest,if available, to TLR, **no remaing funds available.**	Interest, if available, to USFWS, **no remaing funds available.**	Interest, if available, to Watershed Center, **no remaining funds available**
Update	Restoration Plan complete, Phase 1 funds awarded and awaiting contracts.	All SPP projects are under contract and underway	Chilcott Diversion project ongoing	CPW is developing a proposal	Silver Mountain Mine acquisition underway	First Creek Restoration Project by USFWS underway	Watershed Center project is underway

NRD Matter	**RMA Recovery Fund**	**RMA Found- ation Fund**	**Standard Metals**	**Summitville**	**Uravan**	**Vail /Gore Creek**
Total Settlement amount	$17,400,000.00	$10,000,000.00	$415,368.00	$5,000,000.00	$1,000,000.00	$248,660.00
Total NRD dollars spent	$15,496,142.36	$9,709,887.63	$0.00	$5,151,720.98	$1,321,089.13	$42,963.63
Account Balance 8/7/2026	**$5,366,982.74**	**$1,027,085.34**	**$499,920.05**	**$252,976.14**	**$85,164.21**	**$200,466.51**
Most recent TT Resolution Date	2/11/2025	2/11/2025	12/9/2022	1/21/2021	3/24/2021	NONE
Current Trustee awarded amount	$7,981,622.04	$1,504,791.97	$230,000.00	$1,171,620.00	$270,000.00	$250,000.00
Contract Encumbrances	**$5,434,975.32**	**$537,657.63**	**$0.00**	**$218,669.55**	**$80,013.95**	**$199,163.87**
Ending Balance	**-$67,992.58**	**$489,427.71**	**$499,920.05**	**$34,306.59**	**$5,150.26**	**$1,302.64**
Type of Restriction	None	None	None	Money (plus interest) must be spent in Alamosa River Watershed	None	None
Remaining funds available	Negative balance due to Governor interest sweep. RMA lost $228K. Contracts may be reduced.	All funds awarded, interest to be allocated if available, **no remaining funds available**	$230K awarded; **remaining funds for Silverton**	Interest, if available, to TU, **no remaining funds available**	Remaining funds available	Interest, if available, to TU, **no remaining funds available**
Update	DU and Weir Gulch projects are underway	Bluff Lake and Montbello contracts underway	Gossan Creek Project delayed - waiting on FS NEPA - remaining funds for BPMD	10-year contract for the In Stream Flow Project finalized and project underway	DRMS projects are underway.	Gore Creek project is underway

ITEMS #4-6
NO
DOCUMENTS

ITEM #7

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STATE OF COLORADO
DEPARTMENT OF LAW

April 3, 2024

Emily Joseph
Director
Office of Restoration & Damage Assessment
U.S. Department of the Interior

Via Electronic Transmission – https://www.regulations.gov/document/DOI-2022-0016-0024

Re: Comments on DOI Proposed Rule on Natural Resource Damage Type A Regulations; Regulation Identifier Number (RIN) 1090–AB26

Dear Ms. Joseph,

The Colorado Natural Resource Trustees appreciate the opportunity to offer comments in response to the Office of Restoration and Damage Assessment's proposed revisions to the Natural Resource Damage Type A Regulations, 89 Fed. Reg. 733. We submit these comments to convey suggestions on areas where the revisions could be strengthened and clarified.

We understand DOI proposed the revisions to Type A procedures to broaden the scope of releases where they can be used. We believe the proposed revisions to the existing Type A regulations continue to have restrictions that will preclude most Trustees from using the procedures. The bulk of our comments seek to further remove restrictions on the use of Type A procedures.

Generally, we are in favor of revising the existing Type A regulations. However, we believe the Type A process should be less restrictive and allow for greater opportunities for use. Our proposed modifications focus on a strategy for efficiency in government. Specifically, the Type A regulations should focus on the assessment using an approved method with existing or easily obtainable data instead of how much the potential damages might be. Additionally, the requirement of entering into a tolling agreement with the potentially responsible party promotes inefficient government practices. While some assessments may take longer to conduct, this requirement should be optional, and Trustees should be encouraged to complete their Type A assessments as quickly as possible. Similarly, requiring the Trustees to have agreement from the potentially responsible party in order to pursue the Type A process undermines the Trustees' ability to use the simplified process when it chooses to pursue claims against recalcitrant parties. Further, we think the Type A regulations should clarify any Trustee may enter into a settlement at any time throughout the process.

The proposed changes below will help align DOI's damages assessment process with Colorado's and other State's Natural Resource Trustees processes. This alignment should help encourage potentially responsible parties to settle natural resources claims more quickly. Many potentially responsible parties are represented by a subset of insurance companies that negotiate and pay claims for their clients. Increasing the alignment of how federal and state natural resources trustees process claims will help establish consistent processes for trustees and payors to identify, value and resolve claims. This should lead to more settlements and quicker settlements.

DOI also frequently cooperates with Colorado and other states to jointly process claims and to select and oversee restoration projects. Aligning DOI's claims process with state processes will simplify the parties' joint efforts to identify, value and resolve claims.

Colorado's Natural Resources Trustees respectfully propose the following changes to the proposed Regulations:

§ 11.33
What types of assessment procedures are available?

There are two types of assessment procedures:

(a) Type A procedures are simplified procedures that require minimal field observation. Subpart D of this part describes the Type A procedures. Type A procedures may be used for negotiated settlements or litigation of natural resources damages claims. Following Type A procedures entitles the Trustee to a rebuttable presumption that the injuries assessed and damages calculated are correct.

(b) Type B procedures require more extensive field observation than the Type A procedures. Subpart E of this part describes the Type B procedures.

§ 11.34
When may a Trustee use a Type A procedure?

A Trustee may use a Type A procedure if all of the following are satisfied:

(a) The Trustee has decided that existing models (for replacement of resources or habitats, equivalency analysis, recreational losses, benefits transfer, etc.) are appropriate for determining damages to fund restoration activities at the site.

(b) All Federal, State, and Tribal trustees with probable jurisdiction over the injured natural resources who have elected to participate in the claim have discussed and may in the future agree ~~concur in the~~to use ~~of~~ the Type A procedure in the circumstances presented;

(c) ~~Either That t~~The claim that will be resolved using the Type A procedure is expected to be less than $20~~3~~ million (excluding reasonable assessment costs); ~~or the claim relates to injury resulting from a hazardous substance release over a relatively short period of time (e.g., a discrete spill) with a small number of potentially responsible parties and is expected to be less than $5 million;~~

~~(d) At least one potentially responsible party has voluntarily agreed to utilize the Type A procedure. If a claim involves multiple potentially responsible parties (PRPs), the Type A process may not be appropriate unless resolution of the claim involves all significant PRPs, or the resolution of the claim represents a final settlement of the claim for injury to specific natural resources at the site.~~

~~(e) The PRP agrees to toll the running of the statutory limitations period for filing the claim for at least one year and to reimburse the trustees for reasonable Type A assessment costs until the claim is resolved or the PRP gives formal notice of withdrawal from voluntary participation in the Type A procedure.~~

(d) Trustees may use a Type A procedure if they determine that a Habitat Equivalency Analysis, Resource Equivalency Analysis, and other methods listed in 43 CFR § 11.83 are appropriate models for assessing damages to natural resources.

§ 11.35
How does the Trustee decide whether to use Type A or Type B procedures?

(a) If the Trustee determines under § 11.34 that a Type A procedure is available, the Trustee must then decide whether to use that procedure or use a Type B procedure. The Trustee must make this decision by weighing the difficulty of collecting site-specific data against the suitability of the averaged data and simplifying assumptions in the Type A procedure for the release being assessed. The Trustee may use a Type B procedure if they can be performed at a reasonable cost and if the increase in accuracy provided by those procedures outweighs the increase in assessment costs.

(b) If there is no appropriate Type A procedure, the Trustee must use a Type B procedure to calculate all damages.

§ 11.36
May the Trustee use both a Type A and Type B procedure for the same release?

(a) The Trustee may use both a Type A procedure and Type B procedure for the same release if:

(1) The Type B procedure is cost-effective and can be performed at a reasonable cost;

(2) There is no double recovery; and

(3) The Type B procedure is used only to determine damages for injuries or compensable values that do not fall into the categories addressed by the Type A procedure.

(b) Type A procedures may be used for any compensable injury to natural resources. When using Type B and Type A, ~~The~~ Type A procedure addresses the following categories of injury and compensable value:

(1) Lethal and sub-lethal injuries to individual organisms within discrete species or guilds;

(2) Injuries to habitat and ecological productivity;

(3) Impairments to human use, cultural use, and enjoyment of natural resources;

(c) If a Trustee elects to use both a Type A procedure and a Type B procedure, the Assessment Plan must explain how the double recovery will be prevented.

(d) When the Trustee uses a Type B procedure for injuries not addressed in a Type A procedure, they must follow all of subpart E of this part (which contains standards for determining and quantifying injury as well as determining damages), § 11.31(c) (which addresses content of the Assessment Plan), and § 11.37 (which addresses confirmation of exposure). When the Trustee uses a Type B procedure for compensable values that are not included in a Type A procedure but that result from injuries that are addressed in the Type A procedure, they need not follow all of subpart E, § 11.31(c), and § 11.37. Instead, the Trustee may rely on the injury predictions of the Type A procedure and simply use the valuation methodologies authorized by § 11.83(c) to calculate compensable value. When using valuation methodologies, the Trustee must comply with § 11.84.

Subpart D—Using the Type A Procedures

§ 11.40
How does a Trustee use the Type A Procedure?
Once a Trustee has decided that the Type A Procedure is appropriate to resolve a claim ~~and the potentially responsible party has agreed to utilize the Type A Procedure~~, the Trustee should notify and invite other affected Co-trustees to participate in the Type A Procedure. The Type A Procedure must be documented in a Type A Report or similar public and stakeholder involvement document. The term “Type A Report” includes a similar public and stakeholder involvement document deemed appropriate by the Trustee.

§ 11.41
What information is included in a Type A Report or similar public and stakeholder involvement document?

(a) The Type A Report is a document to provide the public with notice of, and an opportunity to comment on, the use of the Type A Procedure.

(b) The Type A Report must:

(1) State that the Trustee is following this rule and provide a citation to the rule;

(2) Explain the basis for concluding that conditions for pursuing an assessment were met;

(3) Describe any agreements among Co-Trustees and potentially responsible parties;

(4) Identify ongoing or planned response activities that could affect the natural resources being assessed;

(5) Explain how conditions for using a Type A Procedure listed in § 11.34 are met;

(6) Identify and describe the model(s) selected to determine damages to fund restoration activities, including the following;

(i) Data inputs and the assumptions used for the model(s);

(ii) Possible existing restoration alternatives that make these model assumptions valid for the purpose of restoration; *[US FWS tends to have an on-going list of possible restoration projects with costs somewhat known that allows FWS to quickly propose and even start restoration projects. Many states have no such basket of projects at the ready.]*

(iii) Results of the modeling exercise;

(7) Note the establishment of an administrative record for the assessment and explain how to gain access to that record;

(8) Explain how to submit comments and state the deadline for comments; and

(9) Identify a contact person.

(c) The Type A report must be made available to the public and provide for a comment period of at least 30 days.

§ 11.42
What documents must be in the Administrative Record when the Type A Report or similar public and stakeholder involvement document is published?

(a) Evidence of efforts to coordinate with response agencies (this need not include any evidence of the substance of discussions, nor documentation of every contact);

(b) Evidence of efforts to consult with other Co-trustees (this need not include any evidence of the substance of discussions, nor documentation of every contact) and documentation of any agreements among Co-trustees;

(c) The invitation to potentially responsible parties inviting them to participate in the Type A Procedure and documentation of any agreements reached with potentially responsible parties.

(d) Information considered when developing data inputs and assumptions for modeling, including complete citations to any literature used;

(e) A printout of the model(s) sufficient for reproducibility (or a copy of the file used to generate the model(s));

(f) Documentation of any assessment costs incurred, if Trustees plan to seek reimbursement of such costs.

(g) Copy of the final Type A Report and each published version of the Type A Report.

§ 11.43
What is the process for Type A Report comments?
(a) Comments received during the comment period must be placed in the Administrative Record and reviewed by the Trustees.

(b) If the Trustees decide after their review that no changes to the Type A Report are needed, the Trustees must publish a notice that:

(1) States that the Type A Report has been finalized; and

(2) Provides substantive responses to significant comments received during the comment period.

(c) If the Trustees decide after their review that it is inappropriate to use the Type A Procedure, the Trustees may decide to use a Type B Procedure for the assessment or stop the assessment.

(d) If the Trustees decide after their review to select different model(s), or substantially change the model data inputs or assumptions to conduct the Type A Procedure, the Trustees must prepare a revised Type A Report or similar public and stakeholder involvement document that reflects the changes, provides any new information about the modified data inputs and assumptions, and substantively responds to significant comments received during the comment period. Minor changes require a statement of explanation of the changes, explanation of why they are not considered substantial, and discussion of any effects on results to be appended to the original Type A Report.

(e) When the Trustees make significant changes to the Type A Report or similar public and stakeholder involvement document based on public comment, ~~T~~the Trustees must provide an additional comment period of at least 30 days for a revised Type A Report.

§ 11.44
How do the Trustees conclude the Type A Procedure?
(a) ~~After the Type A Report is finalized,~~ Trustees may enter into a settlement agreement with potentially responsible parties at any time.

(b) Trustees must involve members of the public and relevant stakeholders in any decisions to spend d~~D~~amages to fund or undertake restoration activities. ~~must be utilized pursuant to a publicly reviewed Restoration Plan consistent with subpart F of this part.~~

(c) The comment period for Administrative Settlement Agreements, Consent Decrees, and Restoration Plans may run earlier, concurrently, or after ~~with~~ the comment period for the Type A Report or similar public and stakeholder involvement document, if appropriate.

Thank you for the consideration of our comments,

PHILIP J. WEISER,
Colorado Attorney General
Natural Resources Trustees Chair

FOR THE ATTORNEY GENERAL

David Kreutzer
Digitally signed by David Kreutzer
Date: 2024.04.03 12:18:22 -06'00'
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ITEM #8-13
NO
DOCUMENTS