





State Water Resources Control Board

TO:

Attached Address List

FROM:

Eileen Sobeck
Executive Director

State Water Resources Control Board

DATE:

June 13, 2022

SUBJECT: OPPORTUNITY TO PARTICIPATE IN THE INITIAL STANISLAUS, TUOLUMNE, AND MERCED WORKING GROUP

The State Water Resources Control Board (State Water Board) invites participants identified in the attached mailing list to join the Stanislaus, Tuolumne, and Merced (STM) Working Group, in accordance with the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, as amended on December 12, 2018 (Bay-Delta Plan or Plan). The State Water Board also invites other interested persons or entities with appropriate expertise to request an opportunity to participate in the STM Working Group.

BACKGROUND

The December 2018 amendments to the Bay-Delta Plan established new and revised flow objectives for the reasonable protection of fish and wildlife beneficial uses on the Lower San Joaquin River (LSJR) and its three salmon bearing tributaries, the Stanislaus, Tuolumne, and Merced Rivers. The LSJR flow objectives in the Bay-Delta Plan consist of a narrative objective, a numeric minimum base flow objective on the LSJR at Vernalis, and a numeric tributary flow objective on each of the Stanislaus, Tuolumne, and Merced Rivers.¹

The Bay-Delta Plan includes a program of implementation that identifies and describes the nature of actions which are necessary to achieve the narrative and numeric objectives. For the LSJR flow objectives, the program of implementation requires the State Water Board to complete multiple actions including, but not limited to, development of biological goals, development of compliance methods for the LSJR tributary flow objective, procedures for adaptive implementation, and establishment of the STM Working Group. The Bay-Delta Plan

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR



¹The LSJR tributary flow objective applies from February through June and requires maintaining 40 percent of unimpaired flow, within an adaptive range of 30 to 50 percent of unimpaired flow, from each of the Stanislaus, Tuolumne, and Merced Rivers at the flow gauge nearest the confluence with the LSJR. During this same time, the flows at Vernalis on the San Joaquin River, as provided by the tributary flow objective, shall be no lower than a base flow of 1,000 cubic feet per second (cfs), with an adaptive range between 800 and 1,200 cfs, inclusive.

requires establishing the STM Working Group to assist with implementation of the LSJR tributary and base flow objectives, including coordination of tributary flows, monitoring and assessment, and evaluation of the LSJR flow objectives. The program of implementation also states that the State Water Board will seek recommendations from the STM Working Group on biological goals, compliance methods for the LSJR tributary flow objectives, procedures for implementing adaptive methods, annual adaptive operations plans, and the San Joaquin River Monitoring and Evaluation Program (SJRMEP). Some of these actions, such as biological goals and compliance methods have been initiated, while other actions, such as annual adaptive operations plans and the SJRMEP will be initiated in future actions to implement the flow objectives.

The Bay-Delta Plan envisions the creation of the STM Working Group as a watershed group and forum for facilitating coordination among the State Water Board and interested water agencies and other stakeholders who have expertise in LSJR issues. Subgroups of the STM Working Group may be formed as appropriate, and State Water Board staff may also initiate activities in coordination with members of the STM Working Group. Issues and activities that will benefit from STM coordination will develop and adjust over time as the State Water Board proceeds through the implementation process, including preparing products such as biological goals and compliance methods.

SOLICITATION OF PARTICIPANTS OF THE STM WORKING GROUP

The State Water Board is forming the initial STM Working Group and inviting specific participants from organizations with expertise in LSJR, Stanislaus, Tuolumne, and Merced River fisheries management, hydrology, operations, monitoring, and assessment needs. As set forth in the Bay-Delta Plan, these organizations include the California Department of Fish and Wildlife (CDFW), National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (USFWS), and water diverters and users on the LSJR, Stanislaus, Tuolumne, and Merced Rivers. The STM Working Group will also include State Water Board staff.

Other interested persons or entities with appropriate expertise may request the Executive Director for an opportunity to participate in the STM Working Group. Examples of persons or entities that may have required levels of expertise and experience include, but are not limited to, the Delta Science Program, U.S. Environmental Protection Agency, university and private-sector scientists, resource conservation districts, San Francisco Estuary Partnership, and non-governmental organizations.

STM Working Group members are expected to support implementation of the Bay-Delta Plan and LSJR flow objectives with collaborative and constructive contributions to the subject matter of the STM Working Group. The STM Working Group will evolve over time as implementation actions proceed. Representatives of the organizations identified on the attached mailing list who are interested in becoming members of the initial working group should submit their intent to join via email to STM-WorkingGroup@waterboards.ca.gov. Please title the subject line: "Intent to join the STM Working Group" and identify the entity and individual who will serve as the primary participant from your organization

Organizations and individuals with appropriate expertise who are interested in becoming members of the STM Working Group, but were not directly invited, should submit a request to join the STM Working Group via email to STM-WorkingGroup@waterboards.ca.gov. Please title the subject line: "Request to join the STM Working Group" and identify the proposed person who will serve as the STM representative and their organization, if any, and a description of the



Attached Mailing List - 3 - June 13, 2022 proposed STM participant's expertise. Please limit the descriptions of relevant experience to no more than one page.

FUTURE NOTIFICATIONS

For additional information on the STM Working Group, its members, and efforts, please visit the State Water Board's Stanislaus, Tuolumne, and Merced Working Group webpage (https://www.waterboards.ca.gov/waterrights/water-issues/programs/bay-delta/implementation-activities-lower-san-joaquin-river.html). Any person desiring to receive future notices concerning the STM Working Group should sign up for the State Water Board's "STM Working Group" email subscription list under "Water Rights" at:

http://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.shtml.

CONTACT INFORMATION

For more information on this matter, please direct questions to Erin Foresman at <u>STM-WorkingGroup@waterboards.ca.gov</u>.

Sincerely,

Eileen Sobeck Executive Director

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State Water Resources Control Board

Initial STM Working Group Memo Mailing list

| Entity | Name | Title | Email |
|-------------------|-------------------|------------------|------------------------------|
| Department of | Julie Vance | Regional | Julie.Vance@wildlife.ca.gov |
| Fish and | | Manager | |
| Wildlife | | | |
| NOAA Fisheries | Cathy | Assistant | cathy.marcinkevage@noaa.gov |
| - West Coast | Marcinkevage | Regional | |
| Region | | Administrator | |
| U.S. Fish and | | Deputy Project | baker holden@fws.gov |
| Wildlife Service, | Baker Holden | Leader, USFWS, | |
| Anadromous | | Anadromous | |
| Fish Restoration | | Fish Restoration | |
| Program | | Program | |
| Merced | John Sweigard | General | jsweigard@mercedid.org |
| Irrigation | | Manager | |
| District | | | |
| Turlock | Michelle Reimers | General | mareimers@tid.org |
| Irrigation | | Manager | |
| District | | | |
| Modesto | Ed Franciosa | General | Ed.Franciosa@mid.org |
| Irrigation | | Manager | |
| District | | | |
| South San | Peter Rietkerk | General | prietkerk@ssjid.com |
| Joaquin | | Manager | |
| Irrigation | | | |
| District | | | |
| Stockton East | Justin M. Hopkins | Interim General | jhopkins@sewd.net |
| Water District | | Manager | |
| Oakdale | Scot Moody | General | smoody@oakdaleirrigation.com |
| Irrigation | | Manager | |
| District | | | |
| San Francisco | Michael Carlin | Deputy General | mcarlin@sfwater.org |
| Public Utilities | | Manager and | |
| Commission | | Chief Operating | |
| | | Officer | |
| U.S. Bureau of | Kristin White | Operations | knwhite@usbr.gov |
| Reclamation | | Manager, | |
| | | Central Valley | |
| | | Operations | |
| | | Office | |
| Bay-Delta lyris | | | |



11.

CALIFORNIA LEGISLATURE

STATE CAPITOL SACRAMENTO, CALIFORNIA 95814

May 17, 2022

The Honorable Merrick Garland Attorney General U.S. Department of Justice 950 Pennsylvania Ave, NW Washington, DC 20530

Re: Request to Investigate Anti-Competitive practices in Water Rights Purchasing and Potential Drought Profiteering in Western States

Dear Attorney General Garland,

Water availability across the West has triggered considerable uncertainty. The last twenty years represent the driest period the region has faced in approximately 1,200 years. In fact, the U.S. Department of Agriculture has reported that as of March 2022 snowpack conditions in the Western United States were ten to fifteen percent below the historical median on average. This was most severe in Oregon and California where average snowpack was below twenty-five to thirty percent, respectively. These conditions have resulted in significantly reduced water supplies worsened by snowpack runoff that does not arrive and historic releases of needed water from Lake Oroville; they have fueled wildfires across the region; they have devastated farmers and ranchers; and they have threatened our overall food security. We write to you concerned by the sharp increase in the purchasing of water rights by hedge-funds that have been taking place at least since 2015, and through anti-competitive practices, has the potential to subvert our regional water and our overall security.

Two of the most important water systems in the Western United States are the Colorado River and the Sacramento-San Joaquin Delta, between them they provide water to approximately 70 million people, which is roughly 20 percent of the population of the entire United States, and they irrigate millions of acres of agricultural land across multiple states. Hydropower facilities along the Colorado River alone provide more than 4,200 megawatts of energy, enough to power 840,000 homes on a hot day. Market based control of these systems could have devastating impacts to those that depend on the water for their daily needs, their livelihoods or their lives. While water rights and water law vary dramatically and policies and regulations have been largely left to the individual states over the past two centuries, water is no longer an issue outside of interstate commerce under any analysis. Not only do hedge funds and other monopolistic

entities trade water as an interstate commodity, they do so at the expense of state and federal policy in the areas noted above. But beyond drought alone, these monopolies no longer even pretend to honor beneficial use doctrines which have historically tied water use to riparian and overlying property owners here in the West. The side effects of this implicates interstate, national and even global economies, reduced energy efficiency and defeating greenhouse gas reduction goals across jurisdictional lines. The domino effect of this activity consolidates economic power and water itself in the hands of the few and will likely require the "big stick" of antitrust actions to break up, lest average Americans are brought to their knees for lack of the most basic resource, water.

Nowhere is there more urgent demand for the application of the public trust doctrine regarding water rights than these practices which literally steal our most life dependent resource from ourselves and future generations in exchange for a profit.

Recent reports indicate that private investor interest and water rights purchasing was likely propelled by the 2015 water crisis in California that was perpetuated by drought conditions. Since then, hedge funds seem to have expanded their interest, and interests, in water. In fact, one such hedge fund has become the largest landholder in Grand Valley on the Western Slope of the Rockies in Colorado. The same hedge fund owns an "account" to hold water in Lake Powell. We are concerned about the ability of investors such as the one described above, or others, to sit on the resources they own allowing them to accrue value during times of crisis, if they so choose, and what that would mean for the people we represent and the position that puts us in collectively. While water markets have the ability to redistribute water fast and flexibly, they also have the potential to be abused, and are highly sensitive to outside forces that increase demand or reduce supply which could cause prices to soar.

In addition to antitrust concerns, we are also concerned about the potential for hedge funds to acquire these water rights through subsidiaries, limiting the ability to track the ultimate purchaser, and for what purpose they intend to use their newly acquired water rights. As one example, though legalization of marijuana in California has made marijuana readily available to those that wish to use it, the illicit market in both states persists. Recent investigations have cited complex operations involving the purchase or leasing of land and water rights to support substantial grows.

These concerns are all the more pressing given the unique conditions California faces in addressing water security and grappling with the drought. Farmers, local governments and individuals in California are struggling with the implementation of the Sustainable Groundwater Management Act, established to restore balance to the state's groundwater basins by placing restrictions on the groundwater pumping that many had grown to depend on, and uncertainty regarding biological opinions that govern the in-flow and out-flow of water into and out of the Delta, and that over the last several years, have continually been challenged and then reassessed. California is also tackling water theft for illegal pot grows. In California alone, since 2013, it is estimated that as much as 12 billion gallons of water has been stolen. Any changes to the Bay Delta Plan or the Colorado Compact, both of which are being considered, will only add to this uncertainty.

Accordingly, we respectfully request that you review whether this activity warrants further investigation to determine the extent to which anti-competitive practices around the purchasing of water rights is occurring, and to what degree those practices include illicit activities.



While we are not necessarily calling for the nationalization of water rights or policy, however we are requesting that you use your investigative powers and your powers under the Antitrust Act to intervene immediately. We believe a tool similar to farmersfairness, gov will significantly aid in these efforts.

Thank you for your consideration of our request.

Respectfully,

Melissa Hurtado Senator, 14th District Dave Cortese Senator, 15th District

CC:

Ron Klain, Chief of Staff to President Joe Biden Camille Calimlim Touton, Commissioner, Bureau of Reclamation Tracy Stone-Manning, Director Bureau of Land Management Gavin Newsom, Governor, State of California Toni Atkins, Senator Pro Tempore, State of California

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California lawmakers mull buying out farmers to save water

by ADAM BEAM Associated Press

Monday, June 6th 2022

SACRAMENTO, Calif. (AP) — After decades of fighting farmers in court over how much water they can take out of California's rivers and streams, some state lawmakers want to try something different: use taxpayer money to buy out farmers.

A proposal in the state Senate would spend up to \$1.5 billion to buy "senior water rights" that allow farmers to take as much water as needed from the state's rivers and streams to grow their crops. If state officials owned those rights, they could leave the water in the rivers to benefit endangered species of salmon and other fish.

California has been mired in drought for most of the last two decades, prompting intense scrutiny of the state's complex water system and how it might be modified to ensure steady supplies during exceptionally dry periods — including a separate state proposal that would pay farmers to grow fewer crops to save water.

Current readings show about <u>98% of the state has severe drought</u> conditions as California heads into summer months that rarely produce any significant precipitation. Many areas have begun restricting water use for homeowners, largely by reducing outdoor use such as lawn irrigation. And farmers have had their allocation from the two major state-owned water systems reduced — in some cases down to zero.

Legally, all of the water in California is the property of the government. But farmers have "water rights" that let them take water for agriculture. Farmers



have used those rights — governed by a complicated system based on seniority and other factors — to turn California's Central Valley into an agricultural powerhouse that provides much of the nation's fruits, nuts and vegetables.

But siphoning off all that water also has disrupted the fragile ecosystem of the San Joaquin/Sacramento river delta, the largest estuary on the West Coast and home to endangered salmon and other fish. Environmental groups and farmers have battled for years over state and federal rules governing just how much water can be diverted for agriculture, which uses far more water than any other sector of the economy.

Now, with California having a record budget surplus of nearly \$100 billion, Democrats in the state Senate have proposed using up to \$1.5 billion to buy senior water rights — by either buying the land associated with the rights, buying just the right itself, or putting an easement on the land that requires the water to be used for fish and other fauna and flora.

The proposal is part of budget negotiations between lawmakers and Gov. Gavin Newsom's administration that should wrap up by the end of this month.

"It's like we're taking a page from corporate America and we're buying back stock," said state Sen. Bob Wieckowski, a Democrat who represents the San Francisco Bay Area and is chair of a budget subcommittee overseeing environmental spending.

While \$1.5 billion sounds like a lot of money, it wouldn't buy that much water. Regulators measure water by "acre foot," defined as enough water to cover 1 acre (0.4 hectares) of land to a depth of 1 foot (30 centimeters). That's the equivalent of 325,851 gallons (1.2 million liters).

A typical household uses 1 acre foot of water each year. Farmers collectively use up to 35 million acre feet of water each year, according to the <u>Water Education Foundation</u>.

The \$1.5 billion would be enough to buy about 200,000 acre feet of water, based on an average price of \$7,500 per acre foot, according to Tom Birmingham, general manager of Westlands Water District, the largest agricultural water district in the country.

Still, Birmingham says the idea "makes an awful lot of sense" because "it is a means by which conflict can be avoided."

Right now, the only way to get more water flowing in rivers and streams is to get state and federal regulators to change the rules. They can do that by requiring more water be left in rivers and streams, but that means less water for farmers. Those rule changes often prompt lawsuits, which can take a decade or longer to resolve, said Lester Snow, a former secretary of the California Natural Resources Agency and regional director of the U.S. Bureau of Reclamation.

"We need a way to take much quicker action. And I think acquiring water rights for that purpose is one of the ways to do that," he said. "With climate change, we just don't have that kind of time."

For this to work, farmers would have to voluntarily sell their valuable water rights — something Birmingham says shouldn't be a problem. Lots of farmers try to sell their water rights to Westlands Water District every year, Birmingham said.

"For many farmers ... their children simply are not interested in continuing to farm," Birmingham said.

But state Sen. Brian Dahle, a republican running for governor whose family has been farming in California for 92 years, said the only reason farmers would be willing to sell is because state officials are driving them out of business with burdensome regulations.

"This makes my blood boil. It's ridiculous," Dahle told his colleagues during a legislative hearing on the proposal. "You are forcing them into a corner where they have no other option."

John McManus, executive director of the Golden State Salmon Association, said as with any legislative proposal "the devil will be in the details." He said he'd want to see rules that make sure any additional water purchased by the state will remain in the rivers and not be removed by someone else with water rights farther downstream.

But he is hopeful the program will work because he said there are about six native fish species that are "on life support right now because we don't have enough water flowing through the Delta."

"So anything that can be done to address that problem is appreciated," he said.

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VI.

9-10 JUNE 2022 BOARD MEETING CONTESTED AGENDA ITEM

AGENDA ITEM: 10

SUBJECT:

CITY OF TURLOCK REGIONAL WATER QUALITY CONTROL FACILITY AND CITY OF MODESTO WATER QUALITY CONTROL FACILITY, NORTH VALLEY REGIONAL RECYCLED WATER PROGRAM, STANISLAUS COUNTY

BOARD ACTION:

Consideration of NPDES Permit Renewal (NPDES Permit CA0085316).

BACKGROUND:

The City of Turlock is the owner and operator of the City of Turlock Regional Water Quality Control Facility (City of Turlock RWQCF), a publicly-owned treatment works (POTW) located at 901 S. Walnut Road, Turlock, California. The City of Turlock RWQCF provides sewerage services for the City of Turlock and the community service districts of Denair and Keys and receives up to 2 million gallons per day (MGD) of primary treated effluent from the City of Ceres. The City of Turlock RWQCF serves a population of approximately 88,000. The City of Turlock RWQCF is designed to provide tertiary treatment for up to 20 MGD.

The City of Modesto is the owner and operator of the City of Modesto Water Quality Control Facility (City of Modesto WQCF), a POTW located at 1221 Sutter Avenue, Modesto, California. The City of Modesto WQCF provides sewerage services for the City of Modesto, the community of Empire, and a portion of the City of Ceres, serving a population of approximately 256,000. The City of Modesto is designed to provide tertiary treatment for up to 14.9 MGD.

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) adopted Order R5-2016-0010 (NPDES Permit) on 19 February 2016, authorizing a surface water discharge from the Facilities to the Delta-Mendota Canal, a water of the United States, via the North Valley Regional Recycled Water Program (NVRRWP) Joint Outfall. The NVRRWP Joint Outfall conveys tertiary treated wastewater from the Facilities to the Delta-Mendota Canal, where it is beneficially reused by agricultural users within the Del Puerto Water District via diversions from the Delta-Mendota Canal at locations downstream of the outfall (up to 59,000 acre-feet per year at build out). The NVRRWP also provides recycled water to supplement the irrigation of south of Delta refuges downstream of the Delta-Mendota Canal.

An Order is proposed to renew the NPDES permit. For the City of Turlock RWQCF, the proposed Order removes effluent limitations for bis (2-ethylhexyl) phthalate, aluminum, mercury, and electrical conductivity, the maximum daily effluent limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS), and the mass-based limits for BOD, TSS, and ammonia from the previous Order. For the City of



Modesto WQCF, the proposed Order removes effluent limitations for electrical conductivity and mercury, the maximum daily effluent limits for BOD and TSS, and the mass-based effluent limitations for BOD, TSS, and ammonia from the previous order. The United States Environmental Protection Agency and the Central Valley Water Board have classified this discharge a major discharge.

ISSUES:

The tentative Order was issued for a 30-day public comment period on 5 April 2022 with comments due by 5 May 2022. Timely comments on the tentative Order were received on 5 May 2022 from the City of Turlock, City of Modesto, Del Puerto Water District, and State Water Contractors. A Response to Comments document is included in the agenda package that summarizes the written comments followed by responses by Central Valley Water Board staff. Changes have been made to the proposed Order based on the comments received.

City of Modesto

The City of Modesto requested that the Far-Field Dilution and Constituents of Emerging Concern (CEC) Studies either be removed from the proposed Order or consider adding clarifying language. Board staff maintained the study requirements because the State Water Resources Control Board Division of Drinking water requested an updated more robust Far-Field Dilution study and CEC information; therefore, additional clarifying language was added for both studies. The City of Modesto also requested removing effluent and receiving water monitoring for total phosphorus. Board staff do not concur and kept the monitoring requirements again due to Division of Drinking Water request to gather data on nutrients that can pose a threat to drinking water conveyance, storage facilities, and treatment facilities, including harmful algal blooms and taste and odor issues. Typographical corrections were provided by the City of Modesto and Board staff updated the proposed Order accordingly.

City of Turlock

The City of Turlock requested that the effluent limitation for chronic toxicity be removed from the proposed permit since the one sample that would have required inclusion of an effluent limit was collected during a plant upset. Board staff concur and removed the limit from the proposed Order. The City of Turlock also requested two pH samples be removed from the dataset due to pH instrument scaling issues. Central Valley Water Board staff concur, removed two pH values from the summer season ammonia effluent limitation calculations and revised the effluent limits accordingly. Typographical corrections were also provided by the City of Turlock and Board staff updated the proposed Order accordingly.

Del Puerto Water District

The Del Puerto Water District had similar comments as the City of Modesto about the Far-Field Dilution and the CEC Studies. As mentioned above, Board staff maintained the study requirements and added clarifying language for both.

State Water Contractors

The State Water Contractors reiterated their continued concerns about introducing recycled water to the Central Valley Project and State Water Project conveyance systems, but the comments were generally in support of the tentative Order, including the increased monitoring and study requirements. The State Water Contractors requested one change to a reopener provision that Board staff have made in the proposed Order.

RECOMMENDATION:

Adopt NPDES Permit.

REVIEWS:

| Management Review: | |
|--------------------|--|
| Management Review: | |
| Legal Review: | |

BOARD MEETING LOCATION:

Central Valley Regional Water Quality Control Board meeting 11020 Sun Center Dr. #200 Rancho Cordova, CA 95670

Bank

Anthea Hansen

From:

Reclamation 120th Anniversary Event <120th_rsvp@usbr.gov>

Sent:

Monday, June 6, 2022 11:25 AM

Anthea Hansen

To: Subject:

You are invited to the Bureau of Reclamation's 120th Anniversary at BF Sisk Dam



You are cordially invited to join us in celebrating the Bureau of Reclamation's 120th anniversary with the groundbreaking of the B.F. Sisk Dam Safety Modification Project at San Luis Reservoir at 10am on Friday, June 17.



Who: Event speakers include:

- Congresssman Jim Costa
- Tommy Beaudreau, Department of the Interior Deputy Secretary
- Tanya Trujillo, Department of the Interior Assistant Secretary for Water and Science

(03)

- Camille Calimlim Touton, Bureau of Reclamation Commissioner
- Ernest Conant, Bureau of Reclamation Regional Director
- Karla Nemeth, California Department of Water Resources Director
- Cannon Michael, San Luis & Delta-Mendota Water Authority Board President

What: Celebration of Reclamation's 120th anniversary and groundbreaking of the B.F. Sisk Dam Safety Modification Project.

When: Friday, June 17. Program begins at 10:00 a.m.

Where: Kennedy Hill, Southeast of B.F. Sisk Dam and San Luis Reservoir. This is the same location where President John F. Kennedy led the groundbreaking for the dam 60 years ago.

Why: The event will recognize 120 years of Reclamation managing water in the West and break ground for the \$1.1 billion project to modernize B.F. Sisk Dam to protect it from future seismic events and for public safety. The dam impounds San Luis Reservoir, the nation's largest off stream reservoir, which provides water for farms, wildlife refuges, and Californians served by the federal Central Valley Project and State Water Project.

How: RSVP to 120th rsvp@usbr.gov by June 13. Additional details will be provided to respondees.

If you would rather not receive future communications from Bureau of Reclamation, let us know by clicking here. Bureau of Reclamation, Denver, CO 80225 United States

