



January 30, 2024

Kevin Peart
Holcim – WCR, Inc.
1687 Cole Blvd., Suite 300
Golden, CO 80401

RE: Longmont Distel Operations, File No. M-1989-029, Technical Revision (TR-5), Adequacy Review #1

Dear Kevin Peart:

On January 19, 2024 the Division of Reclamation, Mining and Safety (Division) filed your Technical Revision request (TR-5) for the Longmont Distel Operations, Permit No. M-1989-029. During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. Item No. 3 on the TR-5 request letter from Holcim- WCR, Inc. states that reaches of the St. Vrain Creek would need to be dammed up to allow equipment to access topsoil piles. Please further clarify for the Division why damming of the creek is necessary to perform this work. What equipment is anticipated to be needed to complete stockpile reclamation? Additionally, in prior conversations, the Division and Holcim have discussed the potential need for a 404 permit. Please describe why this permit or any other permits would be needed to complete stockpile reclamation. Has Holcim contacted the appropriate agency/agencies to confirm or deny the need for such permits? Has the permitting process already begun?
2. Please clarify for the Division if the access road which may be used by Holcim (highlighted in white on the 'Distel Stockpile Map') is within the currently approved permit boundary.
3. The Division accepts Holcim's proposal to not create the three ponds as outlined on the reclamation map. Should Holcim obtain an updated Substitute Water Supply Plan (SWSP) for the site which reflects this change, please commit to providing a copy of this document to the Division when it becomes available.



4. Please clarify for the Division what the red and yellow polygons shown on the 'Distel Stockpile Map' represent. Will these features be amended in some way as part of this proposed change in the Reclamation Plan?
5. Please provide the Division assurance that the proposed changes to the Reclamation Plan, with specific regard to the change in revegetation due to removal of ponds and riparian areas from the plan, are in alignment with the requirements of the City of Longmont's Open Space Master Plan for the St. Vrain River corridor. The site's currently approved Reclamation Plan states that this master plan includes the development of wetlands, ponds, and upland meadows at the site.
6. Please submit an updated Exhibit F Reclamation Plan Map which reflects the proposed Reclamation Plan revisions, i.e. removal of ponds, no tree or shrub plantings, etc.
7. Submit an updated Exhibit E, Reclamation Plan narrative which reflects the changes proposed in this TR request. What is the proposed type of replacement vegetation and ecologic environment for areas previously planned to be wetlands and ponds? If there are any proposed changes to the currently approved seed mix, please submit this information as well.
8. Please provide the Division with a .kmz or shapefile which outlines the currently approved permit boundary. Alternately, you may provide a table of coordinates for the vertices of the permit boundary.

Please submit your response(s) to the above listed issue(s) by **February 9, 2024**, in order to allow the Division sufficient time for review. If you cannot address the above issues by **February 9, 2024**, please request an extension to the decision due date in order to ensure adequate time for the Division to review the materials. A decision due date of February 19, 2024 has been set. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me at 720-868-7757 or hunter.rildley@state.co.us

Sincerely,
Hunter C. Ridley



Environmental Protection Specialist

CC: Michael Cunningham, DRMS