



STATE OF  
COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

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## Alamosa Pit No.2, M1983175- TR-1 Adequacy Review

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Katie Todt <katie@lewicki.biz>

Tue, Mar 11, 2025 at 3:53 PM

To: "Girardi - DNR, Chris" <chris.girardi@state.co.us>, Paul Bottini <paul@southwayco.com>

Cc: Ben Miller <ben@lewicki.biz>, Jared Ebert - DNR <jared.ebert@state.co.us>

Good afternoon, Chris:

Attached please find our response to your Preliminary Adequacy Review 1. Don't hesitate to reach out and we look forward to your feedback soon.

Cheers,

Katie Todt

Senior Consultant

Lewicki and Associates, PLLC

(314) 704-4505



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**From:** Girardi - DNR, Chris <chris.girardi@state.co.us>

**Sent:** Wednesday, February 26, 2025 10:46 AM

**To:** Paul Bottini <paul@southwayco.com>

**Cc:** Katie Todt <katie@lewicki.biz>; Ben Miller <ben@lewicki.biz>; Jared Ebert - DNR <jared.ebert@state.co.us>

**Subject:** Alamosa Pit No.2, M1983175- TR-1 Adequacy Review

Hello,

Attached to this email is a pdf of the Division's Adequacy Review for the TR-1 submittal for the Weed Mitigation Plan.

A hard copy will also be delivered.

Please feel free to reach out if you have any questions.

Thanks,

Chris Girardi

Environmental Protection Specialist Intern



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

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**Alamosa #2 TR-1 Preliminary Adequacy Response 1 250311.docx**  
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March 11, 2025

Chris Girardi  
Colorado Department of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215, Denver, CO 80203  
(720) 793-3041  
**Delivered via Email**

RE: Alamosa Pit No.2, Permit No. M-1983-175; TR-1 Preliminary Adequacy Response

Mr. Girardi:

Please allow this letter to serve as response to your February 26, 2025 Technical Revision (TR-1) Preliminary Adequacy Review letter.

1. The Operator indicated quarterly documentation of treatment activities, environmental conditions, and vegetation response would be effective. However, the application stated that annual reporting will be submitted [to] the Division. Given the severity of the noxious weed infestation at the site, please commit to submitting quarterly reporting of the results of the Weed Mitigation Plan.

The Operator will commit to quarterly reporting for the first year of weed mitigation at the site. However, it is unclear how data from the two quarters of the year when weeds are not growing will be useful to the Division. Following the initial year of weed mitigation, the Operator requests that an annual report be sufficient to satisfy the Division's reporting requirements. This annual update will be submitted with the Annual Report to the Division by the site's annual reporting date of November 25.

2. Please include [a] list of all potential weed species to be treated. The Division observed Tamarisk and Russian olive during the inspection conducted on September 5, 2024, however these noxious were not mentioned in the application. The applicant should consult with Alamosa County regarding this list.

A full list of weeds to be treated will be shared with the Division following the first weed mitigation treatment. This will occur as soon as possible and when appropriate following the Division's approval of this technical revision.

The quote from SLV Ground Control included in the Technical Revision 1 submission includes reference to "tree removal" which includes species such as Tamarisk and Russian Olive. Where possible, noxious trees will be mowed in tandem to other weeds on the site. Where needed, larger individuals of the same noxious species will be cut or dug out for removal.

3. On page 6 of the TR-1 application, Operator included a site map. Please revise the figure to include a legend that clarifies what the red, blue, and green shaded areas correspond to. In addition, please revise this map pursuant to Rule 6.2.1(2).

While a breakdown of the colors used in the weed quote map are included in the headings of the table descriptions, they have now also been included on the map. Please see the attached amended map.

Thank you for your consideration and we look forward to your feedback and approval of the Alamosa Pit No. 2 TR-1.

Regards,



Katie Todt, P.G.

Senior Consultant

Lewicki & Associates, PLLC

(303) 346-5196

[katie@lewicki.biz](mailto:katie@lewicki.biz)

Attachments: SouthwayPit2024 – weed quote.pdf

EC: Paul Bottini, Jared Ebert