



April 7, 2025

Grant Smith
Smith's Materials, LLC
27701 CR-T
Dolores, CO 81323

RE: Line Camp Pit, File No. #M-2001-001 AM-02 Adequacy Review 2

Dear Mr. Smith:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Conversion request in order to ensure that it adequately satisfies the requirements of the Colorado Land Reclamation Act for the Extraction of Construction Materials (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials (Rules). During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before a decision can be rendered.

Exhibit D

1. Map G-3 shows that portions of the permit expansion will be closer than 400' to the Dolores River. Paragraph 16 of Exhibit D does include a discussion on hydrologic balance, but does not address Floodplain Protection Standards. The text in Exhibit D must include a discussion of how the Mining Plan for the entire permit area (both the existing and proposed pits) has been developed to comply with the Division's "Floodplain Protection Standards for Sand and Gravel Pits Adjacent to Rivers and Perennial Streams." Also, a reference should be made to associated analyses and designs in Exhibit G. **Please commit to submitting a technical revision by July 7, 2025, that addresses Floodplain Protection Standards.**

Exhibit F

2. Per Rule 6.4.6(a) please provide a map that shows the proposed topography of the area with contour lines of sufficient detail to portray the direction and rate of slope on all reclaimed lands.

Exhibit G

3. The water decrees that were provided (Case numbers 11CW32 and 11CW33) allow for 60.2 acre-feet of water to be evaporated annually. Map 3 (Annual Free Water Surface Evaporation (Shallow Lake)) of the NOAA Evaporation Atlas for the Contiguous 48 United States shows that the evaporation rate for the area is 42 inches per year. At this evaporation rate only 17.2 acres of groundwater can be exposed to stay below the 60.2 acre-feet of allowed evaporative loss. **Please commit to exposing no more than 17.2 acres of groundwater before additional water rights are obtained.** Any exposed area of groundwater beyond 17.2 acres will be bonded to be backfilled 2 feet above the water table.
4. **Please commit to submitting a technical revision to address Floodplain Protection Standards before July 7, 2025.** For the entire permit area, the applicant must comply with the floodplain protection standards and select one of three options to protect the hydrologic balance



of the affected land and surrounding area:

- 1) A 400-foot setback from the riverbank, or shorter distance as described in the standards.
- 2) Designed structures to allow floodwaters from the 100-year event to enter and exit the pits without eroding banks.
- 3) A detailed analysis that illustrates that a 100-year flood will not result in river capture by the pits or significant damage to the riverbanks.

A combination of these options will be considered by the Division if proposed by the applicant. For example, Option #1 is obviously not viable for the existing permit area but could be used for the proposed area. In that case Option #2 or Option #3 could be applied to the existing area.

If the third option above is selected, this could entail one or a combination of the following:

- A hydraulics model (e.g., the U.S. Army Corps of Engineers software HEC-RAS) that analyzes the velocities and forces during the 100-year flood.
- A detailed hydrology and/or geomorphology study that illustrates that the 100-year storm will not cause significant damage to the riverbanks.
- A detailed soil study that illustrates that the banks consist of material that is similar to soil riprap, as suggested in the AM-02 application. This option should also include a detailed discussion as to why the banks and area between the banks and pits will not be eroded during a 100-year flood event.

The Division is available to discuss these options (or similar options) with the applicant, prior to completion of an adequacy response.

Please submit your response(s) to the above listed issue(s) by Thursday, April 10, 2025 in order to allow the Division sufficient time for review prior to the Decision Date of April 15, 2025.

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

If you require additional information, or have questions or concerns, please contact me at the Division's Grand Junction Field Office.

Sincerely,



Todd Jesse
Environmental Protection Specialist
Department of Natural Resources
Division of Reclamation, Mining and Safety

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Cc: Travis Marshall, DRMS
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