



June 3, 2025

Patrick Lennberg  
Colorado Division of Reclamation, Mining and Safety  
1313 Sherman Street, Room 215  
Denver, Colorado 80203

RE: Dowe Flats Quarry, Permit No. M-1993-041 – Technical Revision #5  
Reclamation Plan Revisions

Dear Mr. Lennberg:

This Technical Revision (TR) application for the Colorado Division of Reclamation, Mining and Safety (DRMS) Permit #M-1993-041 is requesting consideration for revisions to the approved reclamation plan for the Dowe Flats Quarry. The proposed revisions include:

- Retaining the maintenance building, unpaved parking lots, and part of the old conveyor maintenance road in support of the post-mining land use; and
- Modifying the wetland seed mixture to improve plant species diversity.

**Improvements to Retain**

Boulder County Parks and Open Space (BCPOS) has exercised an option to purchase the southern portion of Cemex's Dowe Flats Quarry property (Exhibit 1) once reclamation is completed. BCPOS has requested that several of the current improvements on that portion of the property be retained during and after final reclamation to support their future planned use of the property after acquisition. A letter from BCPOS in support of this change is attached as Exhibit 2. Cemex and BCPOS both believe that the retention of these items supports the permitted agricultural and/or wildlife habitat post-mining land uses of the quarry property. The improvements to be retained, illustrated on the map to Exhibit 2, include:

- All fences and gates
- Unpaved parking lot near maintenance building
- Unpaved parking lot west of maintenance building
- Pedestrian ditch crossing bridge between unpaved parking lots
- Concrete walkway from unpaved parking lots over bridge
- Maintenance building (emptied of all contents including tanks)
- Propane tank south of maintenance building
- Well to maintenance building
- Water cisterns (2)
- Septic systems (2)
- Picnic tables near staff trailers with concrete pad (trailers to be removed)
- Dirt road extending northward along former conveyor corridor

In the current reclamation plan, these items would be removed and the areas revegetated to grassland habitat. This change to the reclamation plan results in 4.4 fewer acres of grassland habitat.



### **Wetland Seed Mixture**

The wetland seed mixture in the current Dowe Flats Reclamation Plan includes only three plant species. One of these species (broadleaf cattail) is no longer commercially available. Also, due to the way the mixture was developed, it would have resulted in a single species monoculture. Cemex is proposing changes to the mixture that would result in greater species diversity overall.

While it would be acceptable to replace the cattail with a single species of similar ecology, Cemex suggests replacing it with several species. This new seed mixture would include eight species instead of three, with adjusted seeding rates reflected in the attached Table 1. This new mixture would have several benefits including:

- Increased wetland species diversity;
- Improved plant establishment – a more varied species composition allows each plant species to better populate its ideal microhabitat within the larger wetlands area;
- Diversified stand structure with a mixture of low-growing and taller species; and
- Reduced competition for establishment of each species by decreasing the overall seeding rate.

In the current mixture, the percentages applied to each species are based on the weight of the seeds and assume that these species all have similar seed sizes. However, they vary greatly, from swamp milkweed, which only has 68,100 seeds per pound, to broadleaf cattail, which has 10,000,000 seeds per pound (see Table 2). While the current percentages based on weight suggest that the seed mixture would be 47% cattails, 47% bulrush, and 6% milkweed, the seeds, once propagated, actually would have been over 98% cattails. Additionally, the distribution would have been 467 seeds per square foot, which is more than four times as many seeds as would typically be applied to a wetland. The revised mixture reduces this to 100 seeds per square foot (see Table 1).

We appreciate your consideration of our requests. Please contact me if you need additional information at 760-963-7556 or brada.evans@cemex.com.

Sincerely,

  
Bradley Evans  
Plant Manager, Cemex Lyons

Attachment: Exhibit 1: Parcel to be Purchased by Boulder County Parks & Open Space with Proposed Changes to the Dowe Flats Reclamation Plan  
Exhibit 2: Letter of Support from Boulder County Parks & Open Space with Map of Retained Structures & Improvements  
Table 1: Proposed Revised Wetland Seed Mixture  
Table 2: Species Composition of Currently Specified Wetland Seed Mixture



**Table 1: Proposed Revised Wetland Seed Mixture**

Scientific Name	Common Name	Pounds PLS/ Acre	% of Seed	PLS/ SF
<i>Carex nebrascensis</i>	Nebraska sedge	1.25	16.6%	15.3
<i>Carex praegracilis</i>	clustered field sedge	1.00	16.5%	15.3
<i>Juncus arcticus</i>	mountain rush	0.10	7.4%	6.9
<i>Phalaris arundinacea</i>	reed canarygrass	2.00	26.4%	24.5
<i>Schoenoplectus americanus</i>	chairmaker's bulrush	1.00	4.5%	4.1
<i>Schoenoplectus maritimus</i>	cosmopolitan bulrush	3.50	14.1%	13.1
<i>Schoenoplectus tabernaemontani</i>	softstem bulrush	1.00	13.6%	12.6
<i>Asclepias incarnata</i>	swamp milkweed	0.50	0.9%	0.8
<b>Total</b>		<b>10.35</b>	<b>100%</b>	<b>92.6</b>

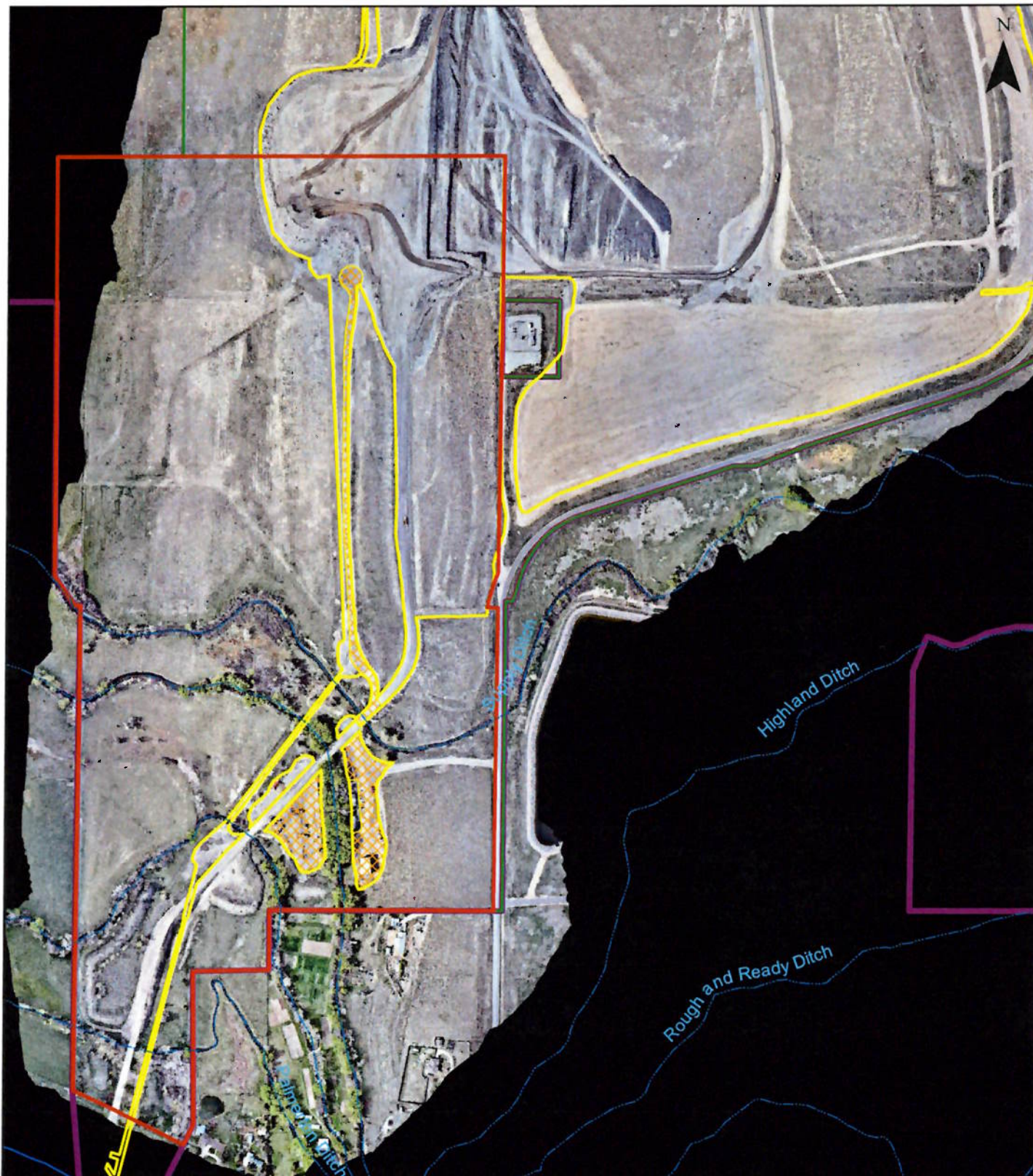
**Table 2: Species Composition of Currently Specified Wetland Seed Mixture**

Scientific Name	Common Name	Pounds PLS/ Acre	% of Weight	Average Seeds/ Pound	% of Seed	PLS/ SF
<i>Asclepias incarnata</i>	swamp milkweed	0.25	6%	68,100	0.1%	0.4
<i>Schoenoplectus maritimus</i>	cosmopolitan bulrush	2.00	47%	162,600	1.6%	7.5
<i>Typha latifolia</i>	broadleaf cattail	2.00	47%	10,000,000	98.3%	459.1
<b>Total</b>		<b>4.25</b>	<b>100%</b>		<b>100%</b>	<b>467.0</b>



**Exhibit 1: Parcel to be Purchased by Boulder County Parks & Open Space with Proposed Changes to the Dowe Flats Reclamation Plan**





- Perennial Stream
- - - Ditch
- Areas to be Retained
- Affected Area Boundary
- Property Boundary
- Permit Boundary
- Boulder County Purchase Parcel



0 250 500 1,000 Feet

## Dowe Flats 2024 DRMS Report

Permit #M-1993-041

Exhibit 1: TR-05 Reclamation Plan Revisions

Prepared By:



Date: 5/15/2025

Drawn By: RFB



**Exhibit 2: Letter of Support from Boulder County Parks & Open Space with Map of Retained Structures & Improvements**



## Parks & Open Space

5201 St. Vrain Road • Longmont, CO 80503  
303-678-6200 • [POSinfo@bouldercounty.org](mailto:POSinfo@bouldercounty.org)  
[www.BoulderCountyOpenSpace.org](http://www.BoulderCountyOpenSpace.org)

April 25, 2025

Patrick Lennberg  
Colorado Division of Mining Reclamation and Safety  
1001 E 62<sup>nd</sup> Avenue, Room 215  
Denver, CO 80216

Re: CEMEX Dowe Flats Mine, DRMS Permit #M1993041

Dear Patrick:

Boulder County has exercised an option to purchase the southern portion of CEMEX's Dowe Flats mine property that contains various improvements related to CEMEX's mining activities. Many of the improvements on that southern portion of the property would be helpful to the county's future intended open space uses of the property. The enclosed map and list together illustrate the improvements the county would like to use after acquiring the property versus a few the county and CEMEX agree should be removed.

CEMEX has agreed to leave the improvements the county has requested if your office approves doing so. I am writing on behalf of Boulder County Parks & Open Space to support revising reclamation requirements so those improvements can remain.

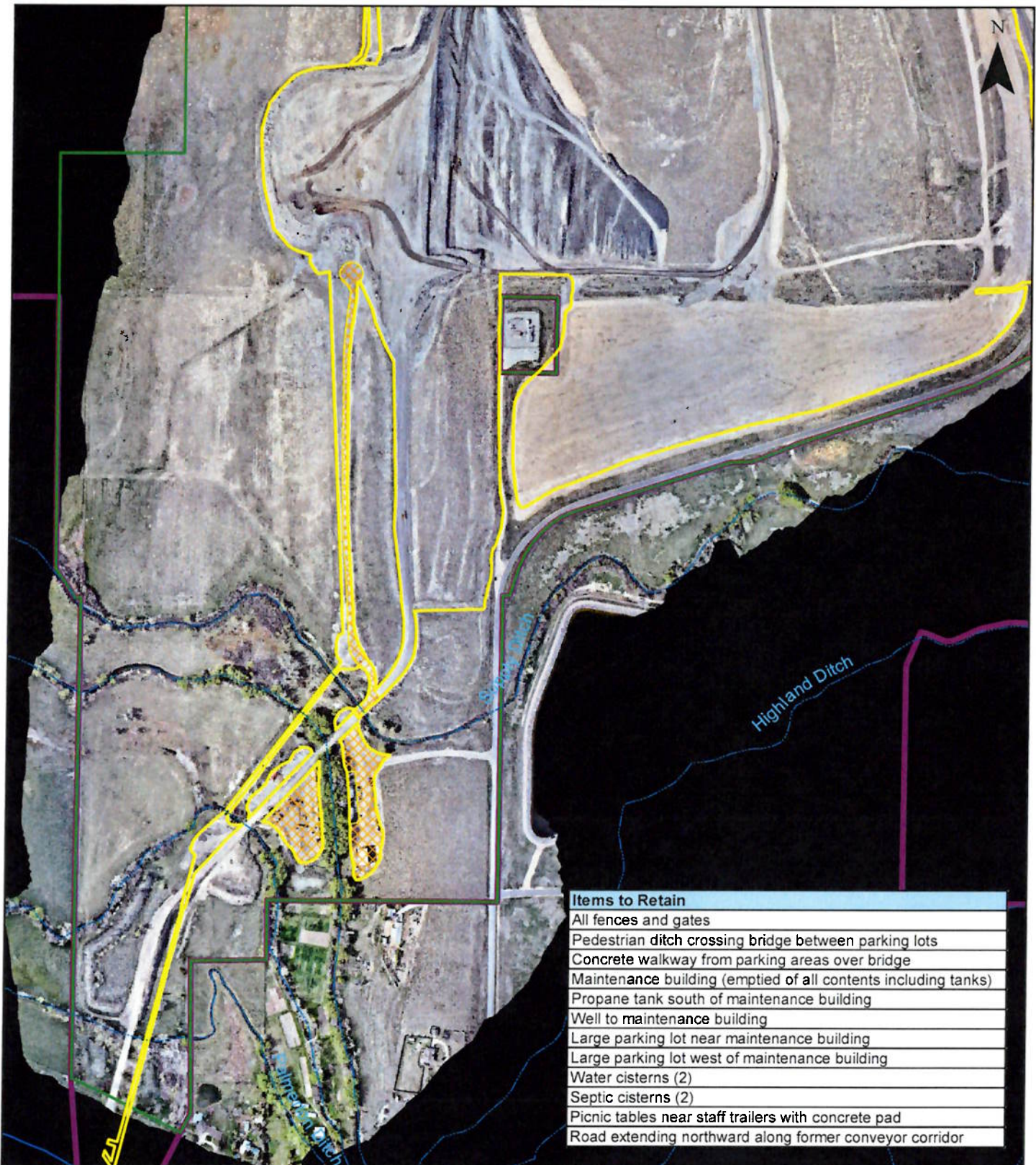
Thank you for considering this request, and please let me know if you need anything else from Boulder County Parks & Open Space to consider this request.

Cordially,

Janis Whisman  
Real Estate Division Manager  
[jwhisman@bouldercounty.gov](mailto:jwhisman@bouldercounty.gov)  
(303) 678-6263

Cc: Dave Hayes, CEMEX attorney, [dhayes@hpkwatlaw.com](mailto:dhayes@hpkwatlaw.com)  
Ryan Malarky, Boulder County Attorney's Office, [rmalarky@bouldercounty.gov](mailto:rmalarky@bouldercounty.gov)  
Liana Larremore, Boulder County Attorney's Office, [llarremore@bouldercounty.gov](mailto:llarremore@bouldercounty.gov)





#### Items to Retain

All fences and gates
Pedestrian ditch crossing bridge between parking lots
Concrete walkway from parking areas over bridge
Maintenance building (emptied of all contents including tanks)
Propane tank south of maintenance building
Well to maintenance building
Large parking lot near maintenance building
Large parking lot west of maintenance building
Water cisterns (2)
Septic cisterns (2)
Picnic tables near staff trailers with concrete pad
Road extending northward along former conveyor corridor

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0 250 500 1,000 Feet

#### Dowe Flats 2024 DRMS Report

Permit #M-1993-041

Figure 1: TR-05 Reclamation Plan Revisions

Prepared By:

Date: 5/15/2025

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