



**Land Use & Building Department**  
**8999 Independence Way, #100 • Alamosa, CO 81101**  
**Phone: 719-589-3812 • Email [landuse@alamosacounty.org](mailto:landuse@alamosacounty.org)**

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November 18, 2025

Chris Girardi  
CO Division of Reclamation, Mining and Safety  
DRMS Room 215  
1001 E 62<sup>nd</sup> Ave,  
Denver, CO 80216

[chris.girardi@state.co.us](mailto:chris.girardi@state.co.us)

RE: Alamosa Pit #2, M1983-175 Amendment

Mr. Girardi,

As you are aware, recent concerns with the operation of the above referenced gravel pit were brought to my attention a year ago in November 2024, as the result of an inspection performed by your office on September 5, 2024. Upon review of the inspection report and discussion with county administration, I added the report to our files for reference, but we did not engage with Southwest Ready-Mix as the noted violations were to state regulations and did not affect the existing county permit.

As background, Alamosa County granted a Conditional Use Permit to Mathias Concrete, Inc for operation of a gravel pit at this 40-acre site on August 30, 1983 by Resolution 83-Z-13. The 40-acre property was sold on March 5, 1984 to Southwest Ready-Mix, Inc who has owned and operated the site since. Our records document that in 2013, Southwest Ready-Mix Inc requested a reduction to the reclamation bond, noting that 3.55 acres of the site had been backfilled and the site was cleared of scrap steel and rubbish.

In July 2025, Mosca Hooper Conservation District shared a letter from PFM Consulting LLC regarding an application to amend the existing permit for this site. The county did not receive notification of this process from the operator or from CO DRMS. Further review of the materials provided by PFM consulting and the inspection report from September 2024 highlighted concerns with the success of the closure and reclamation of the site.

Alamosa County knows this area to have high groundwater, especially seasonally, and this is documented numerous times in various related documents on file in your system. My conversations with the local office of the Division of Water Resources, and their corresponding order dated July 28, 2025, indicate that groundwater has been exposed for more than 25 years. I understand that Southwest Ready Mix, Inc has obtained a permit that covers those historic evaporative losses through December 31, 2025, and that future evaporation during the reclamation process and into the future will require further augmentation. Hopefully, that potential cost will incentivize speedy reclamation of the site to address surfacing water.

I noticed in the September 2024 inspection report that the operator says the site has not been mined in 20 years, and that CO DRMS staff observed a significant amount of noxious weeds, as well as rebar, trash, debris, and tires. The 2013 letter in my files from the operator to CO DRMS requesting the bond reduction also stated, "the site has been cleared of all the scrape [sic] steel and rubbish" indicating that trash and debris has been a persistent issue. County staff also noted the lack of topsoil storage documented in your report, I believe that these issues all raise serious concerns about the commitment of the operator to management of the project site, and potentially to the successful reclamation of the site for either wildlife habitat or rangeland.

Specific to the information we have reviewed about the planned reclamation, we have several general concerns and some comments on re-seeding:

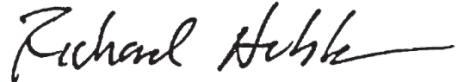
1. Groundwater Monitoring, given the history of foreign trash and debris and appearances that this site was treated as a dump or landfill.
2. Noxious weeds and importation of fill material and topsoil to bring the ground surface high enough to address the groundwater issues and not create seasonal ponds.
3. Long term observation and evaluation of the success of the re-seeding especially. We expect there will be noxious weeds until vegetation is appropriately established, which typically takes at least 3 years.

Regarding re-seeding, establishing vegetation is extremely difficult in our very arid location, and with approximately 7 inches of annual precipitation, almost always requires supplemental watering. The documents provided by PFM lack detail regarding irrigation, seeding depth, seeding time of year, carrier seed, and a weed management plan. The seed mix and planting rate seem appropriate.

I would also note that neither the county nor apparently Mosca-Hooper Conservation District have received any documents or notices from the applicant or PFM consulting (other than the above referenced letter by PFM to MCHD in July) despite such notice being required by your July 11, 2025 letter.

Please continue to engage my office on this process as it moves forward, as Alamosa County is very interested in the successful reclamation of this site.

Thank you,



Richard Hubler,  
Land Use Administrator