



ST. VRAIN AND LEFT HAND WATER CONSERVANCY DISTRICT
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August 3, 2022

Boulder County Community Planning and Permitting
PO Box 471
Boulder, CO 80306

RE: CEMEX Dowe Flats Mining and Reclamation Extension (SU-22-003) Comment

The St. Vrain and Left Hand Water Conservancy District (“District”) appreciates the opportunity to comment on the CEMEX Dowe Flats Mining and Reclamation Extension application submitted to Boulder County. As outlined in the District’s Water Plan, the District is dedicated to the sustainable management of water resources in the St. Vrain and Left Hand Creeks. To this end, and as a Boulder County partner managing water resources in the region, the District has interest specifically in the successful reclamation of retired CEMEX Dowe Flats Mining area (“Dowe Flats”) and CEMEX Lyons Plant (“Plant”) quarry pits either in the immediate or foreseeable future for the benefit of the St. Vrain Creek.

The District requests that any retired CEMEX quarry pits be considered for potential conversion to a creek improvement facility (“CIF”). CIFs are a modern and efficient approach to storing surface water for opportunistic releases back to the creek when needed (e.g. such as during low flow in fall and winter and drought), for the benefit of creek ecology, recreation, and agriculture and municipal use. Quarry pits converted to water storage have also been shown to provide quality habitat for wildlife and recreational opportunities for users, as exemplified by Golden Ponds Park and St. Vrain State Park, both in Longmont, Colorado. Given the state of Colorado’s changing climate, innovative water management solutions like CIFs are required to build regional resiliency against aridification and increasing climate variability. CIFs align with the District’s Water Plan objectives to maintain healthy rivers and creeks and store water for dry years.

The District understands that Boulder County Parks and Open Space (“BCPOS”) “will be able to influence how reclamation is done” at Dowe Flats and potentially at the Plant.¹ The District hopes that BCPOS will engage the District as a potential partner in developing CIFs from retired CEMEX quarry pits if and when reclamation plans are developed. Retired quarry pits would require lining and inlet/outlet infrastructure for operation. If desired by BCPOS, the District may provide project design and implementation funding and oversight as needed. Conversion of retired CEMEX quarry pits to CIFs could prove to be a great example of efficient and successful water resource management in the basin for the benefit of many different user groups.

The District appreciates the hard work that Boulder County has done thus far to evaluate the potential impacts (positive and negative) that may result from a CEMEX permit extension as well as alternative solutions for reclamation. The District looks forward to potential discussions with BCPOS regarding the reclamation needs and requirements for CEMEX quarry pits in the future.

Sincerely,

Sean T. Cronin
Executive Director

¹ Boulder County Parks and Open Space. June 13, 2022. CEMEX Request to Extend Mining at Dowe Flats Memorandum to Parks & Open Space Advisory Committee. <https://pub-bouldercounty.escribemeetings.com/filestream.ashx?DocumentId=14439>