
To:	Dale Case Director of Community Planning and Permitting Courthouse Annex 2045 13th Street Boulder, CO 80306	From:	Stantec Consulting Services Inc. 410 17th Street, Suite 1400 Denver, CO 80202
File:	CEMEX Access Analysis - Supplement Memo	Date:	November 7, 2024

Reference: “The Access Study” requested by the Colorado Department of Transportation for the evaluation of the need for any operational changes to the Cemex Cement Plant entrance

Dear Mr. Case,

Stantec Consulting Services, Inc. submits the following to supplement, and make corrections to any misconceptions regarding, the *Cemex Lyons Access Traffic Study* (“The Access Study” or “Study”).

1. Boulder County did not contact Stantec prior to, during or after completion of The Access Study, regarding the results of the Study or use of the document. As stated on the signature page of The Access Study, Stantec does not authorize and is not responsible for any use of the Study by a third party.
2. The Access Study was not intended to and did not analyze truck traffic volumes for years or seasons prior to the 2022 closure of the Dowe Flats Quarry. Traffic volumes during 1994, when the Cemex plant’s non-conforming use was established, were not considered as part of the Study.
3. Figures and analysis that were used in The Access Study were for a very small snapshot of time, were estimates and were calculated based on three days of data gathered in June 2023, from which one day, June 15th, 2023, was used as an exemplar. Weekly, monthly, yearly or seasonal counts or trends were not included or considered when preparing the Study. As Figure 2, Daily Traffic – Collected Counts from The Access Study shows, there are noticeable changes in traffic volumes within the three-day period. Based on this, it can also be assumed that there are changes in volumes over the course of weeks, months and years and that traffic volumes for those periods cannot be precisely extrapolated based on one day, or even three days, of collected counts. It was not the intent of The Access Study to account for these varying trends.
4. Cemex provided additional data to Stantec, after completion of The Access Study, which showed Cemex truck trips between the years 2006 and 2022. This data illustrated a peak in trips during the year 2020, signifying a decrease in trips between the year 2020 and the Study years, 2022 and 2023. The peak truck traffic occurred in 2020 before the Dowe Flats Quarry closed, illustrating that the closure of the quarry did not cause an increase in truck traffic.
5. Due to limitations of The Access Study, such as scope and schedule, the additional truck counts provided by Cemex, after completion of the Study, were not included.
6. 2022-2023 truck trips, as used in The Access Study, were only marginally higher than in 2019. Similarly, data showed that 2019 truck trips were marginally less than prior years, such as 2007. These trends show that, over the life of the plant, truck trips have remained relatively constant, with some fluctuation from year to year.

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7. The 2020 SH 66 Access Control Plan states that the primary Cemex driveway access will be restricted to “less than full movement if a raised median is added to SH 66 as part of a roadway improvement project, if the property redevelops, or if operational and/or safety issues are identified through the completion of a traffic study”. This requirement, dictated by CDOT, was developed prior to closure of the Dowe Flats Quarry and was used as a final recommendation for The Access Study.
8. The Access Study assumes no increase in Cemex employee trips (non-trucks) because it is our understanding that employee headcounts have remained, and will remain, relatively consistent throughout the years of operation.
9. Our analysis showed that SH 66 and adjacent intersections, as included within the Study area, are experiencing traffic volumes below the maximum operable threshold for existing conditions and therefore adequately service existing traffic, inclusive of truck trips generated by the Cemex plant. Based on current traffic data, the highway should continue to adequately accommodate traffic for the foreseeable future. If the capacity of SH 66 is ever exceeded, it is reasonable to assume that it is not due to Cemex operations, based on the current employee headcount and material hauling needs. Results of The Access Study show that Cemex truck trips will not cause any additional delay or congestion along SH 66.
10. In order to determine whether safety was a driving factor for The Access Study, Stantec asked CDOT if there are any existing safety concerns along the highway. CDOT responded that there are no safety concerns along SH 66 within the vicinity of the Cemex plant.
11. In the last five years, between 2019 and 2023, there were only two crashes located in proximity to the Cemex driveway. Based on the infrequency of crash types and lack of a notable hot spot, there are no identifiable traffic safety or crash patterns related to Cemex operations.
12. The notable lack of recurring approach-turn, broadside, and rear-end crashes signifies no existing safety concerns at this location. Along the SH 66 Study area, the only relatively recurrent crash types are collisions with wild animals and fixed objects, which are attributable to external factors, not Cemex operations. It was also observed that there was no spike in yearly crashes when comparing the year 2023 to the five-year high in 2019 which was pre-Dowe Flats closure (2023 represents plant operations after closure of the Dowe Flats Quarry).
13. For the sake of The Access Study, future volume growth was only applied to vehicles not associated with Cemex trips, as it is not expected that there will be a significant increase in material hauling or, as stated, an increase in number of workers at the Cemex plant.
14. Upon completing an independent review of the *Cemex Lyons Plant Traffic Study* (“Landis Report”), prepared by Landis Evans and Partners, I concur with their findings. Conclusions made within the Landis Report are consistent with engineering analysis performed independently by Stantec. Of note, both analyses utilize data that disproves claims of safety concerns along SH 66 and, more specifically, at or adjacent to the Cemex plant driveway, before and after closure of the Dowe Flats Quarry. Similarly, both conclude that Cemex truck trips have not increased and have minimal impacts to traffic operations along SH 66, based on data trends and engineering analysis.

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Best regards,

Stantec Consulting Services Inc.

A handwritten signature in blue ink, appearing to read 'N. Cioffredi', with a horizontal line underneath.

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