

March 6, 2026

GSI Ref. # 25-226

Sent via email: bchameroy@erieco.gov

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**Request for Waiver to the “Keep Jobs in Colorado Act”
Slurry Wall Trenching Technology
Erie Lake Dam Seepage Rehabilitation
Project No.: P22-291**

Mr. Chameroy,

This letter is submitted to formally request an waiver to provide an exception to 7 CCR 1103-6, known as the *Keep Jobs in Colorado Act* requirements, as outlined at <https://cdle.colorado.gov/dlss/labor-laws-by-topic/job-postings-and-hiring/keep-jobs-in-colorado-act>, for construction activities involving Slurry Wall Trenching technology. This request is submitted to address the requirements outlined in Rule 4 of the Act.

Slurry Wall Trenching is a highly specialized construction method used for deep trench excavation and subsurface construction activities that require strict control of trench stability and groundwater conditions. This technology requires unique technical knowledge, specialized equipment operation, and extensive field experience that is not commonly available within the general construction labor market.

The execution of slurry wall trenching involves complex and interdependent processes, including but not limited to:

- Precise deep trench excavation using specialized trenching equipment
- Continuous monitoring and management of slurry properties (including density, viscosity, and filtration)
- Ongoing quality control, ground stability monitoring, and geotechnical verification

Due to the inherent risks associated with deep trenching operations, groundwater management, and variable subsurface conditions, slurry wall trenching demands highly trained personnel with demonstrated expertise in this specific construction method. Improper execution can result in significant safety hazards, environmental impacts, and substantial project delays.

Industry experience has demonstrated that trench failures can and do occur when slurry wall operations are performed without sufficient expertise. Examples of such failures include:

- Loss of slurry pressure or improper slurry properties, leading to trench wall instability, soil collapse, and uncontrolled ground loss.

- Hydraulic instability or groundwater blow-in, resulting in rapid trench failure, flooding, and loss of excavation control.
- Trench collapse adjacent to active construction or infrastructure, causing surface settlement, damage to nearby facilities, or utility impacts.
- Equipment entrapment or loss due to trench wall failure, creating safety hazards and requiring complex recovery operations.

These types of failures pose serious risks to worker safety, the stability of the Erie Lake Dam adjacent to the slurry trench, as well as risks to the surrounding environment. They can result in costly remediation, schedule impacts, and regulatory consequences.

The labor required for this work typically consists of specialized crews with extensive prior experience in slurry wall trenching operations, often developed through years of project-specific training and hands-on field practice. This expertise is not interchangeable with general heavy civil, earthwork, or standard foundation construction labor. As a result, the available pool of qualified personnel is limited and highly specialized.

Despite good-faith efforts to comply with the intent of the Keep Jobs in Colorado Act, the specialized nature of Slurry Wall Trenching technology makes it impracticable to rely solely on in-state labor availability for these roles without compromising safety, quality, and project performance. Accordingly, we respectfully request an exception to the Act's requirements for those positions directly associated with slurry wall trenching activities.

Granting this exception will ensure that the project is executed safely, efficiently, and in accordance with recognized engineering and construction best practices, while still supporting Colorado's broader workforce objectives wherever feasible.

Thank you for your consideration of this request. Please feel free to contact me at (303) 936-5252 or sartman@geo-solutions.com should you require additional information or documentation.

Sincerely,



Steven Artman
Western Regional Manager | Geo-Solutions, Inc.