



Ph: 970-871-6772 · Fax: 970-879-8023 · P.O. Box 775966 · Steamboat Springs, Colorado 80477

June 25, 2020

Re: Camilletti Milner Pit Number Two Amended
Precision Excavating

Dear Routt County Board of Commissioners and Planning Department,

As part of the renewal of the Special Use Permit associated with operation of the Camilletti Gravel Pit#2 located at 38205 Routt County Road 179 in Milner, CO, Precision Excavating as the operator is requesting an extension to complete the required floodplain study and associated mapping. Based on correspondence with representatives from the Routt County Planning department, FEMA, and the Colorado Department of Natural Resources, we understand for our particular operating site that keeping the mapping and models up to date are seemingly more critical than the potential risks associated with changes in the local or regional hydrology. That said, we intend to complete the floodplain analysis to keep current the base flood elevations (BFE) and regional mapping.

The goal of the updating the flood models is to determine if there is a change of 0.3' (or 3 ½") or more in the floodway and floodplain in the area of the mining. If there is such and most likely there will be due to the large excavation for materials, a LOMR will be required. The modeling could be done now to determine if there is a change, but until the excavation of materials is complete we will not be able to accurately assess what the degree of change in the river area. We propose it would be most appropriate to do required river cross section work, pond depths studies, limits of disturbance and other impacts once mining is complete and they are working on reclamation of the pit. Mr. Buddie of FEMA stated in an email reply on January 6, 2020 that such a plan is effective by the following statement, "I agree as long as they understand the need to come back in prior to reclamation work starting." Based on the email exchanges it appears there is flexibility in the timing for modeling and the LOMR.

At this time Four Points Surveying and Engineering on behalf of Precision Excavation is requesting an extension of the Floodplain mapping from July 2020 until after all excavation for gravel materials is completed for the pit and before reclamation starts. This will allow the work to be completed at a more appropriate and meaningful time based the following:

- The existing large pond helps reduce the base flood elevation and floodway therefore flood impacts to public safety are decreased and considered low to no risk for the downstream areas.
- The Pit owners also own the two westerly parcels to RCR 205.
- Conservation easements exist that significantly limit future development in the vicinity.
- Floodplain analysis was completed as part of the expansion planning in 2009.
- The current economic struggle is real throughout Routt County and the nation. Spending operating budget and additional time for this floodplain work takes away from critical operations and may cause hardships for the pit as well as related delays associated with the Special Use Permit extension.

Granting an extension of this requirement for will allow us to move forward with the permitting process, continue operating and serving the community, and spend the time and budget in the future to produce a quality study to update the BFE and floodway for inclusion in regional mapping and models prior to full reclamation.

The intended purpose of the floodplain analysis is to better understand BFE and floodplain changes and potential hydrologic impacts to downstream or upstream properties. Based on the initial Floodplain Evaluation completed by Water Resource Consultants LLC in February 2009, "FEMA's 2005 maps of the area indicate the expansion is completely out of the regulatory floodway, and only partially within the flood fringe. Based on FEMA maps, the potential depth of water in the flood fringe is typically no more than a few inches deep." Water Resource Consultants also responded to questions regarding stream flows and flooding conditions related to the Pit #2 expansion in November 2000.

Given that qualitative floodplain studies have been completed in 2000 and 2009 showing limited predicted rise and risk, and significant geomorphic changes to Trout Creek and the floodplain are not seen, additional floodplain studies and mapping are not essential for today's use nor necessary to immediately depict current or proposed conditions.

To reiterate, Precision Excavating is not looking to waive the requirement, rather provide for additional time to continue excavation and delay the spending of critical funds.

We respectfully request that you consider the technical information, the current economic crisis, and need for the additional floodplain studies to be completed now and provide Precision Excavating with an extension for the technical floodplain analysis and amendment to the condition.

Sincerely,

Walter N. Magill, PE-PLS
Four Points Surveying and Engineering