August 3, 2021

Bureau of Land Management
Royal Gorge Field Office
3028 E. Main Street
Canon City, CO 81212

RE: Environmental Assessment Comments – Hard Rock Main Pit – Expansion and Road Realignment

To Whom It May Concern:

On behalf of the City Council of the City of Salida, Colorado, thank you for the opportunity to comment on the Environmental Assessment (EA) for the proposed expansion and road realignment for the Hard Rock Main Pit (DOI-BLM-CO-F020-2018-0042 EA) located on County Road 107 approximately one mile south of the City of Salida. The City Council has reviewed the application and would offer the following comments on Alternatives proposed in the Draft EA:

- The Salida City Council supports both trail users and commercial gravel mining operations on lands managed by the Bureau of Land Management in this application. As a community defined by its recreation opportunities, including the recently-constructed Solstice Trail at the heart of this application, it is critical to maintain public access and amenities on our public lands. At the same time, as a community engaged in a growth cycle, it is equally important to utilize raw materials as close to their point of use as possible.
- As a consumer of aggregate materials for roadways, water and sewer lines, and other backfill applications, the City of Salida desires to retain access to gravel and road base as close to the community as reasonably feasible. The existing Hard Rock operations have provided materials to Salida while balancing the right distance away from residential and commercial activities in heart of our community. Any expansion of mining activities must retain a similar way of operating to minimize truck trips on CR 107, limit interactions between traffic and multi-modal roadway users, and mitigate noise, dust, and other potential impacts.
- As a recreation-based community, it is imperative that mitigation measures exist between industrial activities and recreation users. The Solstice Trail is a wildly popular downhill flow trail, and any impact from expansion of mining activities must be mitigated from trail users. Berms, increased vegetation, and limiting expansion areas where feasible are all acceptable mitigation measures. Relocation or redesign of the Solstice Trail is not an acceptable alternative.
- A buffer between the existing Solstice Trail location and expanded mining operations could mitigate impacts between the two different user groups; however, special attention must be paid to erosion or sloughing impacts. Soil conditions in the area of the gravel operations tend to see increased erosion, and conditions following the Decker Fire of 2019 have only exacerbated high runoff debris flows and erosion during rain events. Larger distances between the trail and mining activities are a preferred mitigation measure for the Salida City Council.

In consideration of these comments, the Salida City Council hereby establishes its support for **Alternative B, the No Bike Trail Disturbance Alternative**, with the following caveats:

- It is recommended that the buffer distance between the Solstice Trail and mining operations be increased to the greatest extent feasible to account for potential erosion and sloughing due to environmental and soil conditions. Any erosion should be immediately remediated by the pit operator.
- It is recommended that an evaluation be performed of CR 107 to ensure truck traffic from the mining operations do not further degrade the roadway. In addition, it is recommended that the roadway be enhanced to accommodate multi-modal users including bicyclists, recreationalists, and pedestrians along with existing truck traffic counts. Truck traffic to and from the mining site should be limited to the greatest extent possible.

Thank you for the opportunity to provide feedback on this important issue. As noted above, the Salida City Council supports both recreational trail users as well as production of aggregate materials in this application. We greatly appreciate your attention to this matter.

Sincerely,

P.T. Wood, Mayor
City of Salida