PROJECT NARRATIVE
CONDITIONAL USE REQUEST
FOR
C ROAD GRAVEL PIT
PARKERSON CONSTRUCTION, INC.

I. INTRODUCTION- The accompanying narrative statements, maps and other attached information is provided in support of the conditional use application for gravel extraction and processing for the C Road gravel pit located in the area commonly known as Orchard Mesa in Mesa County. As an accessory use, an asphalt plant, batch plant and material import are included in this conditional use request to allow production of aggregate related products including but not limited to asphalt, concrete, specialty and recycle material. The proposed operation will provide a long-term supply of aggregates for Parkerson Construction, Inc. in Mesa County that will be replacement reserves for the 32 Road Pit, Valley Vista Pit, and the 31 Road pit that will exhaust reserve material at various stages in the foreseeable future.

As of today, there are very few large deposits of quality aggregate material in the Grand Valley that are permitted or have a reasonable chance of successful permitting, are accessible, and are close to the Grand Valley civil infrastructure market. Many of the existing operations are near depletion and at current consumption rates will be exhausted in the next 15 years. As operations close, prices spike as hauling of material from outside locations is costly. This has already happened in other western Colorado counties, where aggregate prices are nearly double those in Mesa County. Permitting additional supply of aggregate material today will help encourage development and civil infrastructure by meeting market demands and delaying eventual resource depletion and subsequent price inflation.

The proposed C Road Pit is also adjacent to the Orchard Mesa Comprehensive Plan Future Land Use Map designated Residential Medium and Residential Medium Low growth areas. Approval of this conditional use permit operation adjacent to future growth and development will decrease the net distance of aggregate material hauled in heavy trucks, thereby decreasing the net impact to the public road system.

II. SITE MAP- Existing conditions that contain Mesa County code submittal requirements for the Site Map, Site Analysis Map, and Utilities Composite, are shown in Exhibit D-Mining Plan. Drainage and Grading are shown in a separate plan titled Drainage and Grading Plan. The existing site is a farming area consisting of a large field (parcel 2943-214-00-066) and a small field (part of parcel 2943-223-21-001) separated by the Wanda’s Wash ditch. The proposed permitted area is 84.9 acres and the proposed mining area is 75.0 acres. Road access for the two homes owned by A & G Partnership, the lessor to Applicant, follows along the wash, along with utility services to the homes. There are a handful of homes in the vicinity, all of which are located farther than 250 feet from the mining area with the exception of two residences owned by the lessor to the applicant. Existing vegetation in the mining area varies depending on the crop planted each year.

III. SITE IMPROVEMENTS- The proposed C Road Pit will have minimal site improvements as most of the affected area will be mining operations that require minimal permanent infrastructure. A scalehouse with truck scales will be located near the base of the entrance road near the conjunction of the aggregate deposits west and east of Wanda’s Wash. This scalehouse may be relocated as mining
progresses. The scalehouse will have a shielded LED exterior light fixture for safety and control of light pollution. Crushing plants, asphalt plants, and batch plants typically have control towers with minor lighting. Employees will park near the scale house or in designated parking areas adjacent to crushing operations that will travel through the pit from Phase to Phase. Significant topography and/or distance buffers the mining area from the surrounding neighborhood. The nearest residences to the north and east are within 200 feet of the mining area and are owned by the lessor to the applicant. The remaining 3 nearest homes are 250 to the east, 400 to the west and 1,200 feet south from the mining area. Topographically mining and processing will occur at least 25 feet below the ground surface (with the exception of temporary stripping activities where excavators, dozers, and trucks will be above the buffer on occasion). Due to these buffers, a vegetated safety berm or fencing will be placed around all open excavations/property lines in lieu of landscaping improvements. Signage will be limited to speed limit signs in the pit, operational signs at the entrance, and miscellaneous safety and operational signs. All of these signs will be at a height no greater than 8 feet and generally 24” x 18” in size, without any lighting or illumination. One to two dumpsters will be placed near the plant areas and/or the scalehouse, along with portable toilets to serve the appropriate number of employees and customers at any given time. The proposed general location of many of these improvements is shown in the Mining Plan.

IV. OPERATIONS-The proposed C Road Pit plans to operate from 6:00 am to 7:00 pm Monday through Saturday, with actual operating hours to vary depending on market needs and business demands. Sundays are only proposed for emergencies typically associated with public works needs like water line rupture repairs, etc. Trucking levels will be in accordance with Mesa County and Colorado Department of Transportation requirements. The site will be secured by a combination of fencing, gates, and security cameras, which is typical of the neighboring 31 Road Pit.

All mining activities will occur at a minimum of 30 feet above the Colorado River, developing an alluvial cobble and sand surface deposit above a shale layer. Mining operations will consist of stripping the upper layer of topsoil where available, which can vary from 0 to 3 inches, and stockpiling in the mining area for future reclamation. Overburden will also be stripped periodically, and stockpiled on site for sales and reclamation. Stripping will occur with either an excavator, haul and/or dump trucks, scrapers and/or dozers. Aggregate material will be mined from the surface to a depth of approximately 40 feet or greater depending on the depth of the deposit, typically utilizing wheel loaders as the crusher will be relocated periodically to be near the bank, but also possibly with excavators, dozers, and haul or dump trucks if conditions warrant. The actual mining depth will depend on the elevation of the underlaying shale layer. A minimum of 2 feet of free draining raw material will be left or replaced above the shale layer. Crushers and plants will typically be situated on pit floor at least 25’ below existing surfaces. Processed material will be sold for civil construction projects, including but not limited to roads, structures, landscaping, bridges, asphalt and concrete projects.

As an ancillary operation, material will be imported from time to time from outlying locations and construction jobs. This material may be reprocessed, utilized in reclamation operations, and possibly resold. This part of the operation is essential to the growing demand for recycle materials as part of green and LEED projects.

The property owner has sufficient water rights from the Colorado River, Wanda’s Wash, and tailwater collection in both conditional and absolute form for industrial and agricultural uses of at least 3 cubic
feet per second absolute and 4 cubic feet per second conditional. Water diversions for daily operations
for operational dust control will not exceed these legal water rights.

Noxious weeds will be controlled in disturbed areas based on the included Weed Management Plan.

V. DRAINAGE-The drainage plan for the gravel pit mining area will be to contain all storm water in the
mining and processing area on site through a combination of grading and berms. The Mining Plan
included in this submittal shows the direction of mining, which is generally from the north east corner
moving south by south west into the far south western corner through Phases 1-3. Phase 4 will be left
as a natural berm during the mining of Phases 1-3 to contain water from flowing to the north, in
addition to providing a visual buffer from homes across the Colorado River to the north. As mining
progresses through the phases, a rise in elevation / berm will be installed on the east side of the mining
to prevent water from exiting the site toward the east. When mining activities start in Phase 4, a berm
will be installed at final grade on the north until the property is mined out and reclamation activities
begin. The geology of the subgrade bank run material that will be left above the shale layer is suitable
to allow free draining and only temporary short term impoundment of surface drainage. An example of
this geology in our neighboring 31 Road Pit, stormwater typically drains through the subgrade in 24
hours.

Another drainage consideration is the culvert and drainage under the extension of C Road west of 31
Road. The existing east to west culvert underneath 31 Road is 12” PVC that carries mainly irrigation
tailwater and agricultural runoff. From there, water currently flows via an open ditch through the 36”
CMP existing north south culvert underneath C Road. In order to improve this intersection, the ditch
will be piped and a manhole installed to connect the pipelines together. The design of these
improvements will be finalized as part of an underground utility permit with Mesa County and Mesa
County access permit requirements and 5-2-1 Drainage Authority code requirements.

VI. RECLAMATION-Reclamation activities will consist of sloping the top of the excavation to the pit floor
at a 3:1 (3’ horizontal x 1’ vertical) slope and spreading available topsoil at a thickness dependent on the
amount available. See map title Exhibit F Reclamation Plan Map for visual details. The slopes will be
seeded with a native, drought tolerant grass mix and established with natural precipitation and possibly
irrigation water if needed. The pit floor will be reclaimed by spreading available overburden and topsoil
at a thickness dependent on available material, but generally is projected to be a minimum of 2 feet of
overburden and topsoil in a layer of 0-3 inches. The pit floor will then be planted with the next viable
crop and irrigated. When sufficient areas of the pit have been mined and established for operations,
remaining areas of the pit floor not needed for operations will be reclaimed into farmground, commonly
known as “reclaim as you go”. An example of this type of completed reclamation activity at our
neighboring 31 Road pit is visible using the Mesa County GIS system.

When the operation is mined out and stockpiles of saleable material are removed, all buildings, plants,
dumpsters, scales and other associated equipment will be removed.

VII. CONDITIONAL USE PERMIT CRITERIA-The following conditional permit criteria are addressed as
follows:
3.8.7.A- Please describe whether the proposed use is not significantly different from adjacent uses in terms of appearance, site design, operating characteristics (hours of operation, traffic generation, noise, odor, dust, and other external impacts) or, if the use is different, that any adverse impacts resulting from the use will be mitigated to the maximum extent practical and reclamation of the site will be adequate; The proposed C Road pit is adjacent and west of the existing 31 Road Pit operated by Parkerson Construction. The proposed operation is similar to the existing operation in that it is surrounded primarily by agricultural use with a small amount of residences located several hundred feet away from extracting and processing activities, and will be an eventual transfer continuation of existing activities in the 31 Road Pit. Housing density in the area is primarily 1 dwelling unit per 5-10 acres within 2500 feet of the proposed mining limits. In terms of operating characteristics, the C Road pit will be similar to the 31 Road Pit in topographic site design, noise, odor, dust and wildlife impacts, which have been minimal in the 29 year life of the existing operation. Mining has occurred in the area since the 1950’s. Similarly the post mining topography and land use will be agricultural, and neither noise, odor, nor dust have been issues in the area.

The proposed allowed hours of operation (6 am to 7pm) differ from the adjacent 31 Road Pit operation that is not allowed to run truck traffic from 7:00 to 8:30 am on only during school sessions, but are consistent with other operations in the general vicinity on east Orchard Mesa and south Clifton, which are allowed 6 am to 7 pm (2009-064 and 2011-056). Hours of operation from 6 am to 7 pm are also consistent with the Mesa County Land Development code. The additional hours will have minimal impact to the surrounding neighborhood locally as noise and dust under current operating conditions have been controlled and existing truck traffic runs safely through the low density neighborhood.

It is important to note that operating from 6 am to 7 pm is critical to serving construction markets, in particular large volume public projects. Currently Parkerson Construction utilizes the 32 Road and Valley Vista Pits to accommodate typical construction schedules and large volume jobs by shifting traffic around the current 7:00 am to 8:30 am school limitation at the 31 Road Pit. This is inconvenient, expensive, and creates an unfair competitive disadvantage due to redundant inventories and operational equipment. As the 32 Road and Valley Vista pits deplete, redundant inventories will not be maintainable, therefore the change in hours will be necessary to competitively operate.

Similarly, the C Road Pit and the 31 Road pit will differ in that the C Road Pit will operate with increased truck counts from a single location. The 31 Road Pit is allowed 100 daily round trips as a condition of the conditional use permit. Similar operations approved in 2010 and 2011 have no limits to daily trucking indicated in the conditional use permits and are a function of economic conditions, traffic studies, and business parity. The applicant is requesting no limits to daily trucking.

It is also important to note that the daily traffic count will not generally have adverse effects on Orchard Mesa and the surrounding vicinity as the proposed C Road pit will essentially shift existing traffic to one location. Haul traffic will originate more in the vicinity of 31 and C Road rather than 32 Road, and will therefore shift some of the current traffic impacts about 1 mile west of their existing
location. Traffic impacts are currently mitigated in all operations by requiring operators to remain within the posted speed limits, and banning drivers/operators who do not follow prescribed pit rules or operate in an unsafe manner.

In essence, the proposed C Road Pit will operate similarly to the 31 Road pit in most aspects and consistent with the surrounding area. The aspects of the C Road Pit that will differ from the surrounding area are easily mitigated through continuing operational methods that are currently in place.

3.8.7 B. Will available facilities and services (including sewage and waste disposal, recycling, domestic and irrigation water [where available], gas, electricity, security measures, police and fire protection, and roads and transportation, special fencing, and signage, as applicable) shall be available upon completion of the project to serve the subject property while maintaining adequate levels of service to proposed and existing development during regular, periodic, and peak usages?

There are no public utilities in the mining area of the proposed CUP, but water and electric lines do run along the existing haul road to service the residence owned by the lessor to the applicant and the pump station at Wanda’s Wash Reservoir, the diversion point for water used in mining operations. This service lines will be relocated during the of mining in Phase 2. The gravel pit will not need domestic water, sewer service, or electrical service. Currently our scalehouses operate on solar arrays. Electrical service may be needed in future operations if a more robust scalehouse trailer with a climate controlled office is installed. The site will have safety berms or a fence surrounding excavated areas. A sign will be posted at the entrance to the pit to identify the site and warn the public of safety requirements. Security cameras will be installed on the site for security and signage will be posted to notify traffic entering the pit. The operation will not affect service levels of existing development in the area. Portable on site toilets and refuse disposal collection will be on site. The C Road Pit will not require an increase in police or fire protection. The access point at 31 and C Road will be improved in accordance with Mesa County requirements and the traffic impact study.

3.8.7 C. Will access will be provided as necessary to prevent traffic hazards and to minimize traffic congestion in public streets and alleys?

The entrance to the gravel pit is located at the intersection of 31 Road and C Road. The access will require constructed improvements, reconfiguration of traffic patterns, and signage improvements to prevent traffic hazards. Traffic congestion should not be a problem as existing background traffic is relatively low in the area. See Level 2 Traffic Assessment prepared by Turnkey Consulting, LLC.

3.8.7 D. How do you plan to provide adequate on-going maintenance to the subject property related to this conditional use permit request?

A reclamation bond will be required by the Division of Reclamation Mining and Safety to guarantee completion of the reclamation. The Division also inspects the mining operations on a periodic basis to ensure compliance with the conditions of the
permit and to assure that the reclamation bond is sufficient to reclaim the site if the operator is unable.

3.8.7 E. *Will adverse impacts to the natural environment be mitigated?* Consider whether the soils and geologic conditions are adequate for the proposed use or whether prevailing winds might cause impacts on site and off site; The proposed C Road Pit is near the existing 31 Road pit and will operate in a similar fashion. The geology in the area is suitable both in the viability of the raw material for processing without effecting the surrounding geology, and of sufficient moisture content that minimizes dust during extraction and processing. The site will be graded to contain runoff and prevent sediment impacts on drainages. Existing Army Corp of Engineer jurisdictional drainages will be left in place and not disturbed. In addition, all activities will comply and be subject to inspections by the State of Colorado Department of Public Health and Environment, the State of Colorado Department of Reclamation Mining and Safety, and the federal Mine Health and Safety Administration.

3.8.7 F. *Describe the need for the proposed use on a community wide basis;* As stated in the introduction, the geology of construction grade aggregate material in the Grand Valley area is a finite resource that will deplete in the coming decades. Not only is permitting and mining aggregate resources prior to development in accordance with State of Colorado law, quality aggregate resources are necessary for all aspects of civil infrastructure including roads, runways, bridges, sidewalks, and foundations. Furthermore, additional supply is essential in maintaining cost effective aggregate to supply the Grand Valley in the years to come. Finally, adding this resource will help retain jobs and tax revenue in the County. Operating wages are typically higher and more consistent hours than many of the other industries, which adds to the local economy, and if the resource is imported from outlying counties, Mesa County will not receive the tax revenue or benefit of good paying jobs.

VIII. LAND DEVELOPMENT CODE-All required elements in the land development code for Mining and Extractives Uses, Section 5.2.13 are addressed in the conditional use permit application as follows:

A. Existing conditions are shown in the Mining Plan that illustrates existing physical conditions and easements, utilities, buildings, and proposed improvements. The excavation plan will be to utilize excavators, scrapers, dozers, and or trucks to remove topsoil and overburden. There is minimal topsoil in some locations, but what is available will be stockpiled on site. Existing topography will be used to create berms that provide some obstruction to views from the north side of the river that will serve the dual purposes of containing sediment/runoff. Raw aggregates will be mined directly from the bank at the base of the excavation and fed directly to the crusher utilizing front end loaders. Reclamation (rehabilitation) will consist of leaving an approximately layer 2 feet of raw material above the shale layer at the bottom of the deposit, and spreading approximately 1-2 feet of overburden and all available topsoil at a gentle slope to allow for irrigated farmland that will be seeded with the most viable crop. See the Mining Plan and Reclamation Plan maps for details.
B. An excavation permit will be obtained, consisting of a mining permit approved by the State of Colorado Department of Reclamation, Mining, and Safety.

C. Excavation or deposit of overburden will not be conducted within 30 feet of a boundary of an adjacent property, easement, ditch, or right of way unless by written agreement of the owner of such property.

D. Excavation within one hundred twenty five feet of a dwelling unit will not occur, with the exception of a trailer located within the permitted area that is owned by the lessor to the applicant. Excavation involving the use of rock crushers, asphalt plants, cement batch plants, and other similar equipment within 250 feet will not occur.

E. Excavation activities will not occur within 100’ of a public road right of way or the one hundred year floodway, with the exception of future C Road right of way that will be at a lower elevation post mining of the gravel deposits in the area. There are no existing trees in the proposed permitted area.

F. The haul route plan is shown on both the Mining Plan and the Traffic Impact Study.

G. The haul road inside the permitted area will be paved for the section shown in the Mining Plan and graveled for the remainder as shown in the Mining Plan. Roads will be watered as needed to control dust in accordance with the State of Colorado Department of Public Health and Environment Air Pollution Control Division Permit (air permit).

H. Operation will be 6:00 am to 7:00 pm Monday through Friday for all operations. Occasional Saturday hours for selling and loading will be needed, and non-operational maintenance may occur on the occasional Sunday. Sunday operational hours are proposed only for emergencies.

I. No public facilities or adjacent flooding will be caused by operations as stormwater runoff will be contained on site. The raw material left in the pit floor has adequate drainage. No storm water will be impounded for more than 48 hours, as has been demonstrated in the existing 31 Road Pit.

J. The C Road operation, similar to the 31 Road Pit operation, will have minimal visual impacts to the surrounding area due to mitigating factors including topography, distance, vegetation, and the mining plan. Topographical buffers will be created as operations will be approximately 30 feet below existing surfaces, and there are distance buffers between residences from 200 to 1,200 feet. Existing vegetation will screen residences on the north and southeast. The view from and including the Colorado River will typically not see mining activity until Phase 4, which is the end of the life of the mine. These factors will not fully mitigate visual impacts but provide similar mitigation as the existing 31 Road Pit.
K. Once the pit is depleted, material will be removed and reclamation activities completed. Reclamation activities at this site will likely be completed sooner than the 5 years required by the Colorado Division of Mining Reclamation and Safety as farming activity will be quicker to establish than most native seed applications. In addition, there is a financial incentive for operators to reclaim as soon as possible to release bonds and annual permit fees.

L. Operations shall comply with noise, vibration and other standards in accordance with the Colorado Revised Statutes.

M. Air emissions will comply with the Mesa County Health Department, State of Colorado Department of Public Health and Environment Air Pollution Control Division.

N. Storm water and or process water in the mining area will not be discharged and activities will comply with the State of Colorado Department of Public Health and Environment Water Quality Control Division. There are sufficient water rights for mining operations and agricultural operations through a combination of Orchard Mesa Irrigation, and adjudicated water rights from the Colorado River, the Wanda’s Wash Drainage, and tailwater rights in existing drainages, which will be discharged into the Colorado River.

O. Slopes will be revegetated after they are constructed as part of the reclamation plan.

P. The proposed development schedule will be as follows, which is an estimate only and subject to market conditions:
   a. Phase 1 Area 2017-2021
   b. Phase 2 Area 2022-2027
   c. Phase 3 Area 2028-2041
   d. Phase 4 Area 2042-2047

Q. Material extraction will occur within the 3 years unless market conditions require an extension to be requested.

R. Parkerson Construction, Inc. will install road improvements prior to operations.