



Adventure Cycling Association

September 18, 2020

Colorado Division of Reclamation, Mining and Safety
1313 Sherman St.
Denver, CO 80203
RE: Application by Peak Ranch Resource (File No. M2020041)

To whom it may concern:

I am writing to seek Party status to testify and provide comments about Peak Materials Permit Application File No. M2020041 by Peak Materials to establish a gravel mining operation at the site designated as Peak Ranch Resource. This proposed gravel mine will adversely affect the safety and mobility of touring cyclists on two national bicycle routes: the Great Divide Mountain Bike Route (GDMBR) and the TransAmerica Bicycle Trail.

Adventure Cycling Association (adventurecycling.org), is a national non-profit organization with 52,000 members. We provide mapped bicycle routes across North America. The Great Divide Mountain Bike Route (GDMBR) and the TransAmerica Bicycle Trail (TA) are our most popular routes, traveled by thousands of cyclists every year. The TA, established in 1976, traverses the continent, from Oregon to Virginia. The route averages about 1,200 touring cyclists per year. The GDMBR travels from Banff, Alberta, Canada to the border of Mexico and averages 1,100 gravel bike-packers every season. Both routes attract people of all ages and interests to experience America's spectacular natural beauty via gravel and paved roads on a bicycle.



These routes are also part of two non-sanctioned bicycle events every year, the TransAm Race and The Tour Divide, both begin in June each year and attract hundreds of people from all over the world, both as riders and virtual followers.

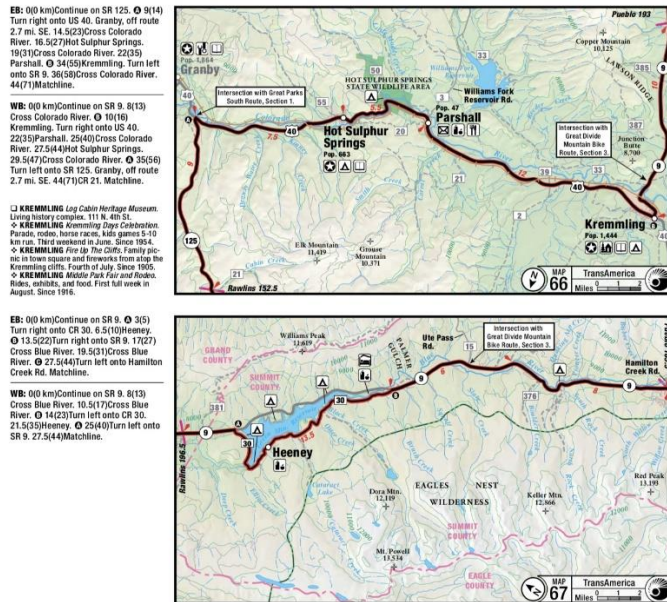
The gravel mine lies directly on both of these popular bicycle routes as you will note from the following map sections (please note that the North arrow on the TA sections are not pointed up, this is deliberate to fit the route on our printed maps). Cyclists use SR9 for access to the towns of Kremmling and Silverthorne which provide vital supplies and services such as food, water and accommodations.

Adventure Cycling Association

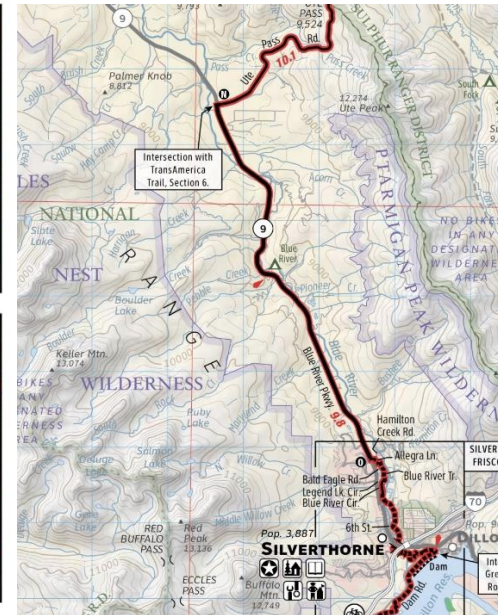
A member-supported nonprofit organization, inspiring and empowering people to travel by bicycle.

(800) 755-2453 • (406) 721-1776 • info@adventurecycling.org
www.adventurecycling.org • 150 E. Pine Street, Missoula, Montana 59802

TransAmerica Route, Map 6 Sections 66-67



Great Divide Map 4



Bike travel, including bike packing, is an active tourism market that is growing substantially and brings valuable tourism dollars to the communities and small businesses along these routes. A study by the University of Montana Institute for Tourism and Recreation Research indicates bicycle tourists spend approximately \$103 per day and stay in a region longer than motorized tourists, providing a much needed economic boost to rural communities.

The placement and operation of the gravel mine would seriously affect the health, safety, and enjoyment of touring cyclists in the following ways:

1. The noise, exhaust, and dust created by machinery and truck traffic will be hazardous to the active tourists as they are vulnerable to air quality more than other types of visitors. This is clearly a health hazard to people recreating in the area.
2. Operation of the mine will create heavy truck traffic, estimated at 230 truck trips per day, along a narrow roadway with limited shoulder space. This is a significant safety hazard for cyclists. In addition to the obvious safety concern of pairing large haul trucks with bicyclists, the curvy nature of the roadway can also inhibit drivers from seeing cyclists.

As a non-profit organization that is committed to providing recreational and travel opportunities that are environmentally friendly, we confer with concerns by Friends of the Lower Blue River (FOLBR) and Lower Blue Residents United (LBRU) in which the following issues are noted:

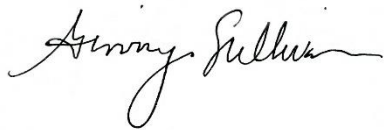
1. *Danger to the water well quantity and quality for residents along the route;*
2. *The safety, health, and migration patterns of wildlife will be adversely affected as this area is surrounded by federal wilderness and thousands of acres of county open space, and conservation easement ranch land;*
3. *The Blue River waterway will be negatively affected from pollution and run-off from the mine;*

4. *There will be a negative impact to air quality in the Lower Blue River Valley from truck trips, mining machinery and operations;*
5. *Residents and visitors alike will be adversely impacted by noise and air pollution created by 230 truck trips per day to and from the Peak Ranch Resource and the Peak processing plant near Maryland Creek Ranch in Silverthorne;*
6. *The protections from Summit County's Lower Blue Master Plan, which deems any industrial activity is antithetical to the natural, rural, and economic values and sustainability of the Blue River Valley and forever protected from development by conservation easements.*

Adventure Cycling has little flexibility in providing reroutes or detours if the Colorado Division of Reclamation, Mining and Safety allows this gravel mine to develop. The very theme of the GDMBR requires the route to stay within the Continental Divide corridor using dirt roads and trails. A reroute of the TransAm would require a major adjustment of possibly hundreds of miles. The value of recreation, tourism and the health of the local environment over time greatly outweighs any short-term benefits this gravel mine will provide for the region.

We ask that the state keep the Lower Blue River Valley a thriving destination for bicycle tourism and recreation by providing due diligence during the application review process. Consideration of how to keep our most vulnerable road users safe is an absolute imperative.

Sincerely,

A handwritten signature in black ink, appearing to read "Ginny Sullivan". The signature is fluid and cursive, with a long horizontal line extending from the end.

Ginny Sullivan
Director of Routes and Advocacy
Adventure Cycling Association
gsullivan@adventurecycling.org
(406) 532-2769