USDA United States Department of Agriculture | Forest Service | Pikes Peak Ranger District | 601 South Weber
Colorado Springs, CO 80903
719-636-1602
Fax: 719-477-4233

File Code: 2850
Date: May 19, 2022

Mr. Jerald Schnabel
Castle Concrete Company
549 East Cucharras Street
Colorado Springs, CO 80903

Dear Mr. Schnabel,

This letter is regarding your revised Pikeview Quarry Reclamation Plan (MPO), in accordance with the Forest Service (FS) mineral materials regulations at 36 CFR 228, Subpart C. The Reclamation Plan (RP) is not dated and was received on April 26, 2022, by the Pikes Peak Ranger District of Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands (PSICC). The Pikeview Quarry Reclamation Plan has been assigned an identification number of 2850-021209-RP-2022-001. Please use this number for all future correspondence.

The PSICC Engineering and Minerals Staff have completed a preliminary review of the RP to ensure all necessary information has been provided in accordance with 36 CFR 228, Subpart C. As part of the review, the FS assessed your proposed activities to ensure they are authorized by law, are reasonable and follow logical progression, and are designed to minimize adverse environmental impacts.

In this regard, I am requesting the following additional information. Please note that each of the sections correlate to the section on the Operating Plan form that you submitted to the FS. I have included follow-up remarks to some of my original questions in **bold.**

Section IV. DESCRIPTION OF THE OPERATION

A – Access

- The FS recommends that prior to construction, contractor/permittee submit an access/haul road plan and temporary traffic control plan for trucks going to/from the site, particularly the areas that are through neighborhoods and past parks and schools. Plan should identify the routes already designated on the Operation Plan document, include temporary traffic control plan showing the signage, speed limits, signal person/flagger requirements if any, storm water pollution prevention measures to assure that material is not tracked through neighborhoods, identify any load restricted or posted bridges that they will be over legal, if any, and permissible days of week/hours of hauling.
    - **No response was provided to this comment**.

B – Map, Sketch, or Drawings

- Exhibit D, (f), page D-7, references exhibit C-1 showing topsoil stockpile locations but that exhibit is not in the revised package.
    - **Exhibit C has not been provided. Please provide.**
- Exhibit E, Final Grading Slopes, and Drainage, references "The reclamation drainage plan is included in Exhibit G." but that exhibit was not included. Please

provide Exhibit G. (Exhibit G also referenced on Exhibit D, page D-6). The Reclamation Plan provided references Exhibits C. D, G, F, L, however only Exhibit E has been provided with the document. **All exhibits should be provided as they are a part of the reclamation plan.**

C – Project Description

- Please clarify what the requirements for benching lifts into existing slope are and include benching detail in your drawings.
    - **This is a safety concern. Specifically, I am concerned that when you place compacted material against an existing compacted or solid surface there is no integration of particles between the existing and new material. This can create a failure and slippage plane. How are you assuring that you do not have a laminated surface at this point? How will you prevent a slip plane being created from each lit abutting to the existing slope?**
- How are existing surfaces and new placed compacted surfaces prepared prior to next lift being placed upon it to prevent delamination and assure good bond between preceding and succeeding lifts?
- Scarification is not shown anywhere in the plans or drawings that I have found. The "requirements documents" should have all requirements captured.
- Exhibit D, imported fill, the USFS recommends no concrete materials be included in the imported fill.
    - **Exhibit D should be revised to reflect this prohibition. Exhibit D was requested and not provided.**
- Section 10.0 Period of Inactivity, states "seeding is limited to either early spring or late fall." If seeding in late fall, will the same seed mix be used? What is plan for soil stabilization during winter since it is highly unlikely that any establishment would occur for several months at least.
    - **Unresolved. My concern is that if you place the seed in the fall, it will not grow until spring growing season. How will the slopes be stabilized, and erosion prevented, if there is no vegetation all winter? Is there a plan for unvegetated slopes in winter?**
- Could three-foot lifts be too thick to achieve compaction unless materials are very large? What is the material that will be placed in 3-foot lifts maximum dimension or aggregate size? How was this thickness determined to be sufficient to allow proper compaction with the method proposed?
    - **The Reclamation Plan now states each layer of fill shall be placed in approximately 1-foot-thick lifts unless approved by the engineer, but never to exceed 3 foot maximum. Please make sure to keep any documentation of that approval and track all locations of 1 foot vs. 3 foot depth lifts.**
    - **Unresolved Remaining Comment – the concerns about how testing will be performed on 3 foot lifts was not addressed in your response and is not addressed in reclamation plan. Where is the testing plan for lifts greater than 1 foot? How will you test the full 36" lift to assure the entire lift is properly compacted?**
    - **Please ensure your compaction test locations are not in main tire paths and are in areas more likely to have been insufficiently compacted.**

  - **The locations of the compaction tests should generally not be in the haul roads. Compaction tests should be taken in areas that are more likely to have insufficient compaction. I understand that compaction at the haul road will occur from the constant traffic, however I am interested in documenting the quality of compaction outside of the haul road. The comment is not about methods of compaction, but it is about the locations of the tests that confirm the methods are achieving the minimum required percentage ***consistently across the entire lift*****.**

- How will sufficiency of compaction effort be evaluation by Quality Control Team? Will there be testing?
  - **The reclamation plan should communicate the types of testing. Part 3.0, page 16, discusses compaction and testing in general but does not state what type of test will be used. Test methods are generally specified by ASTM. Nuclear gauge results are usually verified by additional tests such as sand cones, but I am not sure you can do a sand cone with the gradation of material used, so how would you validate the nuclear density gauge results? What proctor will be used? Standard or modified? How often will you pull one-point proctors to confirm the 5 proctor you are using is representative of the material? Also, an Inspection and Test Plan ITP is a defined acronym in the reclamation plan document, but I do not see the actual plan anywhere. Will that be developed?**
- The revised language in Exhibit D greatly clarifies the compaction testing, however, the language in the entire Reclamation Plan does not align with the language in the Exhibit. Please make the Reclamation Plan and Exhibit D consistent.
  - **The revised Exhibit D has not been provided and that is where most of the information I relied on was in. Provide Exhibit D. Otherwise, I assume conflict remains.**
- SOO page 18, section 8.0 says "Placed material will be compacted to achieve the permit approved density as specified in the application revision. (Page 3, Amendment 4, Response to Adequacy 2, 7, 2020.)"
  - **What is this density? What will be the method of testing? Will standard or modified proctor be used? Will each lift be tested? How many LF of each lift requires testing?**
  - **Your response is generally acceptable, however, the response needs to be communicated in the documents as well. I do not see this level of specificity and detail in the documents provided. Your reclamation plan discusses the 5,000 CY frequency but does not state standard proctor or 90% density required. I appreciate the explanation, but the question is ultimate a reflection of information not in the plan and documents provided that needs to be. Also, concern remains on how the 3ft lifts will be tested. Additionally, how will you track your tests to show that you have a passing test result for every 5,000 CY placed? Note, a Revised SOO was not provided and that is the document that ultimately warranted the question.**

Section V. ENVIRONMENTAL PROTECTION MEASURES

B – Water Quality

- Please clarify the following points on page 9, Section V, Surface Water Quality Impacts: Please provide a copy of the approved Water Quality Control Division Storm Water Permit and Storm Water Management Plan to the USFS.
    - **A copy of the permit application was provided. The permit application is a renewal application and states though that the following discharge types are not eligible for coverage under CDPS General Permit CO500000 (which is the permit application used): Storm water discharges with construction activity that disturbs one acre or more" and I believe that applies here. My concern is that this permit does not address construction stormwater discharges.**
- Where is the 'approved drainage stabilization plan" referenced at bottom of page 12? Is this already approved or to be submitted and approved? Does it address any of the aforementioned concerns?
    - **You did not provide an answer to this question.**
- On 100-006, show details of the end of the main drainage area at station 0+00.
    - **No details were provided in your April 26 response.**

H – Reclamation

- The revised plan does address application of tackifiers. However, based on USFS experience this may not be sufficient to stabilize the PGM until vegetation is established without some degree of compaction effort.
    - **The documents provided do not reflect the responses provided, as I see it. Any documents submitted need to communicate how you will do what you are proposing. Please assure that project plans communicate this method of erosion control and where blankets will be installed.**
- To avoid any future confusions regarding terminology, I recommend that permittee include a material definition for "sub-base" and "subsoil" and show they are equivalent as well as avoid using inconsistent terms unless there is a technical reason and define that reason in the definition of each term.
- Page 14, last paragraph & Drawing 400-002, for Rocky Mountain Juniper & Grass, 60 to 30 trees per acre is highly variable range. Is there a reason for the range and not specifying a specific number? If 30 trees are planted and 21 established is that minimally sufficient?
    - **Comment omitted or no responded to by permittee.**
- Page 15, will a single initial watering be sufficient to meaningfully establish vegetation, especially in drought conditions? Will areas be reseeded if establishment is insufficient?
    - **Note, the original comment truncated. (Page 15, I am very concerned that a single initial watering is not sufficient to meaningfully establish vegetation, especially in drought conditions. How long will you wait for the natural moisture to establish vegetation? When do you reseed if you don't get enough establishment?)**
- Omitted Comment - Page 15, how is 'appropriate time for successful germination' defined? (Overnight temperatures for x consecutive days, etc.?) For seed mixes, how many lbs. /acres will be applied? What is the germination rate? Any seed certifications

necessary showing weed free/no noxious weeds?

- **No response provided.**

Please consolidate all of your responses into one narrative Reclamation Plan. A blank form is attached for your convenience.

Once I receive this additional information and the Reclamation Plan is determined to meet the requirements of the 36 CFR Subpart C regulations, it will be included into the Forest's program of work. An interdisciplinary (ID) team will be assigned to analyze and disclose the environmental impacts from the proposed activity, as required under the National Environmental Policy Act (NEPA). Following completion of the NEPA analysis, you will be required to accept any stipulations the Forest deems necessary to minimize adverse impacts, in addition to posting an acceptable reclamation bond in accordance with 36 CFR 228.51.

If you have any questions and/or need clarification regarding the above information, please contact Geologist Amy Titterington by phone at 719-838-0699 and/or by email at amy.j.titterington@usda.gov.

Sincerely,

CARL BAUER

Digitally signed by CARL BAUER
Date: 2022.05.19 17:29:55 -06'00'

CARL BAUER
District Ranger

Enclosures:

1) Copy of Reclamation Plan received on April 26, 2022
2) Blank Operating Plan form FS-2800-5

cc: DRMS - Tim Cazier; Stantec - David Moore