



CITY OF RICHMOND

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March 2, 2010

Cache County Planning Commission

Attn: Mr. J. Clair Ellis

179 North Main

Logan, UT 84321

Re: Proposed Rainey Ranch ski resort

Dear Sir,

Richmond City has addressed the documents provided by the Planning Office relative to the proposed Rainey Ranch ski resort. In behalf of Richmond City I respectfully submit this and the attached documents for the consideration of the Planning Commission.

In sum, our concerns are:

- Possible contamination of our culinary water source springs.
- Possible contamination of a newly acquired culinary water source well.
- Damage to water transmission line.
- Negative impact upon Richmond City streets and roads.
- Lack of providing any funding or mitigation relative to repair and maintenance of streets and roads.
- Residential safety from the increase in traffic through a primarily residential area.
- Nuisance factor from increased traffic.
- Impact on Emergency Response personnel and equipment

A further discussion on each of the points is attached as part of this document.

Sincerely yours,

Michael E. Hall

Mayor

WATERSHED CONCERNS

1. Possible Contamination of Spring(s): From the sketch Mr. John Chadwick presented to Richmond City Manager Marlowe Adkins, it appeared that at least one ski run will abut the designated wilderness area boundary. Should that be the case, there is a distinct possibility of contamination into at least one, and possibly two, of the major culinary water source springs for Richmond City.

Richmond City's primary culinary water source comes from a series of springs in close proximity to the proposed ski resort. No matter the intent of the entrepreneur, any time large groups of people are placed in close proximity to a water source an automatic contamination danger becomes evident. The concern is not only the down-slope flow of melt water from the snow, but also that the percolation of water into the sub-surface water table can spread contamination into underground aquifers.

2. Possible Contamination of Well: Richmond City recently acquired a well for future culinary water use by the City. The well location is at the mouth of Cherry Creek Canyon, down-flow by both surface and sub-surface water from the resort area.

There are three major concerns for aquifer contamination: a) the advertised septic system to handle human waste with the associated drain field, b) the parking lot showing space for three hundred fifty (350) vehicles (The cover letter from Mr. Chadwick has penned in the number 250 cars but the "Base Area Plan sheet 2" shows the 350 number.), and c) fuel storage container(s) for the on-site electrical generator(s).

Septic system and associated drain fields: As noted in our accompanying City Engineers review, the Division of Drinking Water considers any septic system to be an uncontrolled source for pollution. To our knowledge, there doesn't appear to be any intense evaluation of the suitability of the terrain to handle a septic system without contaminating downstream water sources, such as the City's well. In this instance even the so-called "grey water" is a major danger due to the chemicals found in cleaning agents. To assume that the normal percolation of fluids through the soil, without specific testing and analysis by a competently trained authority, will "sanitize" the end product would be grossly irresponsible under any conditions. When dealing with a potential water supply for a municipality such irresponsibility borders on the criminal hence we are obligated to deal with this issue.

Parking of vehicles: Even under the best of conditions motorized vehicles leak pollutants, primarily of a petroleum source. Additives to gasolines enhance the pollution aspects of such fluids. Such pollution has been known to force the complete closure of sub-surface water sources to human consumption. While an occasional vehicle constitutes a reasonable risk, a constant flow of up to 350 vehicles at any one time presents too high of a risk to a municipal culinary water source. To bring the risk down to a reasonable level would require a highly engineered, essentially "leak-proof surface" with some type of fluid recovery system not allowing any type of fluid access to the local soils and aquifer.

Generator fuel storage: Essentially the concern is the same relative to the danger of spilled fuel. While a "capture reservoir" is required for all fuel storage tanks, there is no requirement for them to be impenetrable over a period of time. Although the chance of such a catastrophic leak is low, Richmond City has an obligation to consider even a low-chance situation as a hazard unless engineered mitigation can be put into place satisfactory to all parties and ensuring the safety of the aquifer.

RICHMOND CITY INFRASTRUCTURE

1. Possible Damage to Water Transmission Line: The transmission line for both Richmond City and the Richmond Irrigation Company parallels, for the most part, the county road leading to the proposed resort. Damage to this line would, literally, shut Richmond City off from its municipal culinary water supply.

The depth of this line varies and would require test digs to determine the exact depth. Should any construction take place on or near it, danger to the continued flow of water will be significant. At best a separate, parallel line would have to be put into place moving the transmission away from the road; however, such a move would entail right-of-way issues. Such action would be very expensive and cannot be borne by Richmond City.

2. Streets and Roads: Richmond City has considerable concern relative to the increase in traffic over our streets and roads leading to the resort area. The avenues of transportation to that area, within the City limits, are currently inadequate to handle a sizeable increase in traffic.

The logical flow of traffic to the resort area will have traffic exiting U.S. 91 (our 200 West) at Main Street, proceeding east along Main Street to 300 East, north on 300 East to 500 North, and east on 500 North to the City limits. None of these streets and roads are either wide enough nor substantial enough to withstand heavy volumes of traffic. Indeed, our resources are being taxed with the current population plus those living in the "Cove" area of the unincorporated County that utilized 500 North, 300 East and Main Street.

Since the declared intent of the resort is for skiing, the heavy traffic flow will obviously occur during the winter season. From the road maintenance point of view this brings two difficulties to the forefront. First, should pavement fail it is impossible to properly repair it during the winter. Asphalt batch plants do not go into operation until the weather moderates, and "cold-patch" asphalt is not effective during the winter. Second, 500 North includes a relatively steep hill that requires heavy sanding/salting even during a mild winter. To ensure that traffic going to the resort would be able to surmount that hill will call for an increase of sanding and salting well above the norm, and probably require extra overtime effort on the weekends (which will logically be the heavy-use days). The extra expense in terms of both sand/salt costs, equipment usage and wear, and personnel overtime will be significant.

No mention is made whatsoever on the part of the developer relative to mitigation of the expenses associated with improving and maintaining these streets and roads within Richmond City. Even under the best of financial conditions there is an insufficient economic base for the

City to make such improvements and absorb the increased cost of maintenance. Current economic conditions render any such effort prohibitive.

3. Residential Safety: The initial portion of Main Street going east from U.S. 91 has a church on the south side, residences on the north side. When religious services are in progress, which is nearly all day on Sunday's, worshipers cars are parked on a 45 degree angle on Main Street establishing a traffic "choke-point." Beyond the church, going east, is about a half-block of residences on both sides followed by about a half-block of commercial businesses on the south side and government buildings on the north to State Street. From State street east to 300 East is residential with the street noticeably narrower. On 300 East from Main Street to 300 North is residential on both sides and without any sidewalks. From 300 North to 500 North is currently open fields; however, re-zoning efforts are currently underway and it is anticipated that residences will line this street in the relatively near future. The increase in traffic, under current conditions, will increase the danger factor for citizens, whether young or old, with the lack of sidewalks on 300 East and the "rural residential" nature of the neighborhoods being a deciding factor. A particular concern focuses on children at play and their natural inattention to areas where they do not perceive a particularly intense threat during most of the year.

4. Nuisance Factor: The potential for a marked increase in traffic noise has been one of the most often mentioned detriments voiced by Richmond citizens, immediately following the safety issues.

EMERGENCY SUPPORT

1. Fire and EMT Support: Richmond City assumes that, due to proximity, the Richmond City Fire Department and EMT's would be the logical first-response to the resort area. This has generated concern relative to the suitability of our equipment to traverse the County road and private road to any emergency scene at or near the resort, particularly under winter conditions.

A matter which requires serious consideration and must be addressed is the reliability and suitability of current emergency equipment to access the mountain region during the winter. Our "brush truck" can readily handle wildfires and support fire service personnel in hilly areas during the dry season, but with winter conditions this becomes an unknown factor. Added to this is the proposed size of the lodge, which would require full turn-out of equipment from Richmond and adjacent communities for occupied structure fires. There are no fire hydrants, nor can any be installed off of the Richmond City and Richmond Irrigation Company transit line, at the resort site. (This is a technical impossibility due to the speed of the water flow in the pipes, plus such an interruption - were it possible - would shut off water to the municipal area.) Tanker trucks may well have some difficulty accessing the scene. These issues must be addressed via the Cache County Fire Chief as it is not a City responsibility beyond our concern for our crews.



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Richmond City Engineer

MEMO

February 23, 2010

Re: Proposed Ski Resort, Cherry Creek Canyon

I reviewed the documents forwarded to me by the Mayor February 22, 2010 concerning the proposed Ski Area in Cherry Creek Canyon. My comments are as follows.

The cover letter makes mention of several items which will need to be further addressed:

- Night skiing is mentioned. Though the project is located in the County, the proponent will want to check compliance to any dark sky ordinances.
- Parking for 250 cars is mentioned. The current roads leading to the proposed area do not have the capacity, nor are they intended to support this type of traffic loading. The County road from the bus turn around to the site is essentially a two track unimproved road. Also, Richmond City's main culinary water transmission line is adjacent to the road and must be protected if the road is widened. Additionally, Richmond's roads, and in particular the County's roads, may not be of adequate width or structure to handle the increase in the amount of and loading from (from heavy delivery trucks) new traffic. Mention is made that the road in the County (last 1.25 miles) will be improved to County standards, but consideration for the roads through Richmond City as well as the existing asphalt and gravel road in the County needs to be made as far as improvement/reconstruction for the increased traffic and loading. The grade of the asphalt road at the County line as well as the intersection to the existing gravel road (500 North 600 East) need to be addressed as well. The question as to who will maintain, repair and plow the roads will also have to be addressed.
- Reference is made to three 1-inch water service connections to Richmond's culinary line. I question the intent of the connections, whether single family, commercial, or stock watering. Additionally, there is no treatment or disinfection at this point in the system and no plans for such. The letter indicates that water quality will be

monitored. If there are indications of bacterial contamination, who will be responsible to supply "clean" water. There is also no water storage in this area.

- A septic system is proposed for treatment of the sewer. The septic system will be up gradient and therefore within the source protection zones for the well that Richmond City has purchased for a culinary water supply. It will also be up gradient of several private wells and springs within the canyon. The State DDW considers a septic system an uncontrolled pollution source.
- The letter mentions that on-site electrical generators will be used. This poses a concern for the source protection areas for the Richmond City well as well as other private wells and springs in the area. The generator area will have to be designed and constructed in a manner such that any spills will be contained.
- Water retention ponds are listed. The parking and surrounding area may be subject to storm water regulations that will insure that water which infiltrates into the ground does not transport pollutants as it recharges the aquifer.
- Fire is also mentioned. Currently, there is no water storage facility for fire suppression in the area, with no plans to construct one. The proponent will have to work closely with the fire department to address its needs. Flow from the Richmond springs is not likely enough to meet a year round 3,000 gpm flow for a larger stick built structure. Additionally, if the entire flow was used, it would cut off flow to Richmond City. There would also be a risk to the aged line itself. The proponent should coordinate with Richmond City and the Richmond Irrigation Company as to whether the spring's water can be used for this purpose. Fire and emergency service access, as well as patron regress, needs to be worked out with the Fire Department. Also, which agency will provide fire service to the facility, and have agreements for that service been drafted? I am uncertain whether Richmond's equipment is able to travel on winter roads of this nature.

I also reviewed the site plan and have a couple of minor questions. Is the facility located out of the path of potential debris flows and/or avalanches? Is there any historical knowledge or indication of avalanches and/or debris flows in the area?

A traffic study has also been submitted to the County, but it was not included in the packet I received. The County is reviewing the study, and I strongly encourage the City to stay involved in that process and make sure the entire transportation corridor is addressed.

In summary, there are several questions/items which need further addressing. They are;

- Richmond City's (and private) source(s) of culinary water
- Traffic and road/corridor needs
- Fire suppression
- Road maintenance.

If you have any questions, feel free to call me.
Darek