CAPITAL PROJECT SUMMARY

The Park City Bevill Waste Soils Management Facility

3821 Kearns Boulevard

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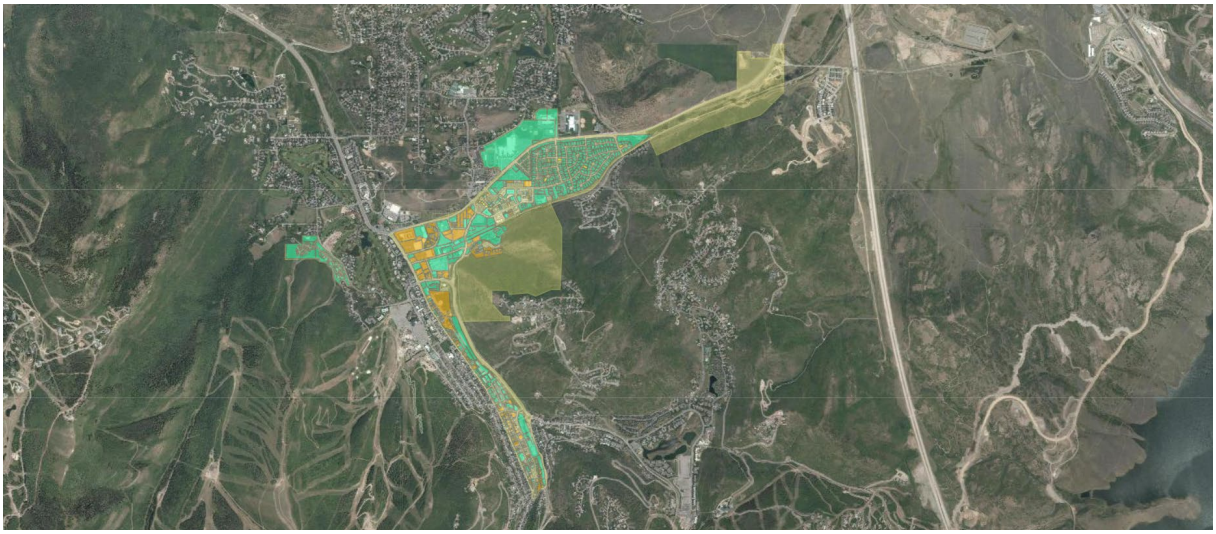
1. Project Overview

A. Executive Summary

In Park City, historic mining activities present a constant challenge for both the public and private sectors regarding soils management. Environmental impacts, costs, site-suitability, public perception, government regulation, health concerns, and externalizing impacts are just a few of the issues related to mitigating our mine-impacted soils.

Most of Park City's mine-impacted soils are subject to Park City Municipal Code Section 11-15: Park City Landscaping And Maintenance Of Soil Cover (known as the "Soils Ordinance"). This Section applies to a large geographic area (see Figure 1) in Park City within which all dirt, no matter its content, must either be covered with 6 inches of appropriate cover material, or if disturbed (i.e. through excavation for construction) capped on-site or relocated to a repository in compliance with local, state, and federal requirements.

Figure 1: Park City Soils Ordinance Boundary



In addition, most of Park City's mine-impacted soils fall under a specific Congressional and EPA classification called "Bevill Waste" because they are byproducts of the hard rock mining process. The Bevill Waste classification regulates how mine-impacted soil is handled, managed, and stored.

As a result of our mining history, the Park City area includes numerous voluntary soil cleanup areas, locations where mine-impacted soils have been capped on-site, EPA-led enforcement and removal actions, and use of repositories and disposal facilities. The most notable include portions of Empire Pass, Daly Canyon, the Old Town Transit Center, Creole Gulch/Alice Load, Park City Heights, Prospector, and four large EPA Operating Units (OU) along the Silver Creek basin (between Prospector and Interstate 80).

B. Proposed Gordo Bevill Waste Soil Repository

For several decades, Park City Municipal Corporation (PCMC) researched various locations near or within the town to find an effective solution for mine-impacted soils consistent with the collaborative watershed-wide cleanup effort involving the U.S. Environmental Protection Agency (EPA), United Park City Mines (UPCM), Summit County, and community stakeholders. This approach originally prioritized solutions that avoided the inefficiency and conflict of a more traditional regulatory and litigation approach. The Silver Creek Watershed project for many years successfully addressed the ongoing needs generated by municipal, private, and residential construction projects.

Unfortunately, due to a complex convergence of factors, both PCMC and Summit County had to undertake individual discussions with state and federal regulators regarding short and long range solutions. To stay responsive to our communities and preserve budget predictability of ongoing capital projects, we had to continue parallel planning for safe management of mine-impacted soils.

On June 18, 2020, the Park City Council considered various alternatives during a public meeting, which included the advice of the Utah Department of Environmental Quality (UDEQ) regarding a future soil repository. Staff recommended and City Council confirmed that the "Gordo site," located behind the intersection of Richardson Flat Road and SR-248 was a viable option to consider because:

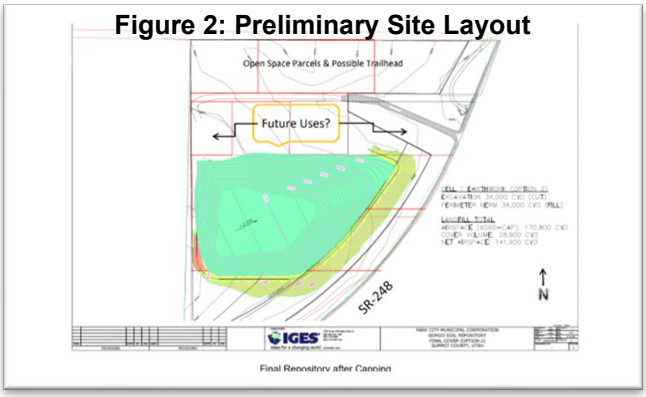


Figure 2: Preliminary Site Layout

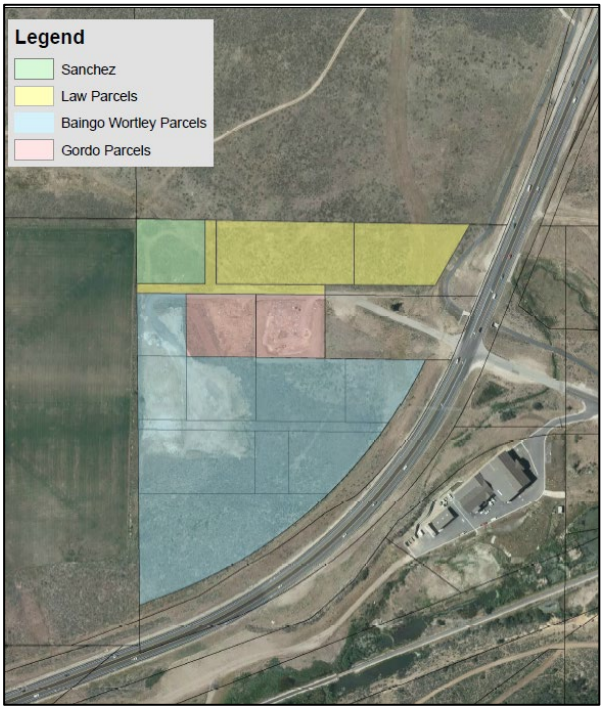
- The zoning allows for municipal use;
- The property is owned by the City and unencumbered with deed restrictions or conservation easements;
- The location is mostly shielded from view from SR-248 due to natural topography;
- The site is not located near residential and commercial uses;
- The property does not include any environmentally sensitive habitat, watershed, or other ecological features; and
- Use of the property would result in significant savings, estimated at +/- $14 million at the time (since revised up to closer to $17 million).

After receiving positive direction at the June 18 Council Meeting, staff undertook a series of feasibility steps. These activities included procurement of water and environment/soil repository experts, initiating the UDEQ planning and regulatory process, initial site planning (see Figure 2), and providing additional updates at regular City Council Meetings in November 2020 and February 2021.

The UDEQ protects and safeguards Utah's air, land, and water through balanced regulation. UDEQ's Solid Waste Program administers permitting and compliance programs for non-hazardous solid waste treatment, storage, and disposal facilities throughout the State. UDEQ has reviewed PCMC's Class I Landfill Permit Application and issued a draft permit that was subject to a 30-day public comment period.

PCMC's proposal contemplates two soil cells, a new Recycle Utah headquarters, PCMC public works storage, and a trailhead with limited parking. The cells would only be open for municipal use, and likely on a limited basis by appointment for Park City residents within the Soils Ordinance boundary. It would not be available for commercial development or other projects outside the Soils Ordinance boundary and will be permitted to accept only Bevill Waste.

i. Site Information



The Gordo site includes parcels located adjacent to 3821 Kearns Boulevard in the northwest quadrant of Quinn's Junction. The 21.1 acre site is within Park City,approximately 2.5 miles northeast of the City's town center.

The Gordo parcels (Figure 3) are zoned Residential Development (RD Zone), except three parcels at the north end zoned Recreation Open Space (ROS Zone). Municipal uses are allowed in the RD zone. The open space parcels are not part of the proposed construction area for the repository, but were included within the UDEQ overall application site area to improve connectivity and planning opportunities, including post-closure parking and access alternatives.

Today, a portion of the area serves as a temporary storage facility for Bevill Waste soils, and sand and gravel. Storage began after the Richardson Flat repository closed and includes soil from various municipal street and tunnel projects, such as the Comstock and Bonanza Drive tunnels. The soils are currently capped, consistent with PCMC's Soils Ordinance and UDEQ approvals obtained at the time of placement. The site is also used to stage materials and equipment for unrelated municipal and utility projects.

ii. Project Scope

Soils classified as toxic or hazardous are not permitted in this type of repository. Only material classified as Bevill Waste would be stored here. The first cell (Cell 1) would be

developed at the east-central portion of the property and provide space for the on-site Bevill Waste soils temporarily stored, as well as municipal infrastructure projects. Cell 2 is proposed to accommodate other miscellaneous municipal and small residential construction projects over the next 7-10 years.

The cells would be deisgned to industry standards and lined with impermeable plastic liner. A groundwater monitoring system would be installed concurrently to detect any leachate.

As part of the public comment process, UDEQ will evaluate public comments, including those concerning the recreation and trail questions submitted during the public comment period. PCMC is confident these areas are being addressed safely and in a manner similar to impacted soils associated with the Rail Trail, trails generally, and Silver Creek.

iii. Project Budget & Costs

The current cost estimate for constructing the Bevill Waste repository at the Gordo site is approximately $1.8 million. The UDEQ requires PCMC to maintain a financial assurance in the amount of $900,000 for Closure and Post-Closure costs, including 30 years of groundwater monitoring. This financial assurance requirement will be satisfied by funds PCMC proactively set aside for soil mitigation several years ago.

By comparison to using the Gordo site, the costs of hauling Bevill Waste to facilities in Tooele County are considerable. The City estimates the cost is approximately $6.1 million for the existing soils stored at Gordo (approx. 35,000 cubic yards of soil). The City estimates another $10.5 million for the proposed arts and cultural district and the Bonanza Park and Homestake affordable housing projects. We also estimate an additional $4.4 million for other essential municipal infrastructure projects.

The difference in cost between creating a facility at the Gordo site versus hauling to facilities in Tooele County is estimated to be close to $17 million (see Table 1).

Table 1: Soils Hauling to Tooele County v. PC Soils Management Facility

Hauling Soils to Tooele County Facilities			
Item	Cost/Cubic Yard	Qty – cubic yard	Total
Soils currently at Gordo	$175	35,000	$6,125,000
Arts & Culture Site	$175	60,000	$10,500,000
Other City Projects & Prospector Residents	$175	25,000	$4,375,000
Total		**120,000**	**$21,000,000**
Constructing and Hauling Soils to Gordo Site			
	Cell 1 & 2	Closure and Post Closure	Total
Soil Repository @ Gordo Construction (inc. existing soils)	$1,800,000	$900,000	$2,700,000
A&C & Bonanza Park and Homestake Housing costs to haul to Gordo	60,000 cy	$70/truck @10cy/truck	$420,000
Future City Construction Projects	60,000 cy	$70/truck @10cy/truck	$420,000
Total			**$3,540,000**

iv. Operations

As noted above, PCMC will operate this facility under a UDEQ permit. The permit contemplates a limited access facility. The permit also imposes a variety of management requirements to assure protection of human health and the environment during operation of the repository. These are important management and monitoring requirements, include tracking the quantity and source of Bevill Waste, screening monitoring of material prior to acceptance, and ongoing wind, dust, and weather controls. For details, see PCMC's permit application (Section 3 – Plan of Operation, page 17).

v. Project Milestones

The following are important project milestones, associated documents, and public meetings available for those seeking additional information about the project.

- City Council Policy Analysis, Direction:
  - June 18, 2020 – Discuss Future Uses of the City-Owned Gordo Property
    - Meeting Link
    - Staff Report
    - Preliminary Site Assessment
    - DEQ Concurrence w Assessment Letter

- November 19, 2020 – Soils Repository Project Update
  - Staff Report
  - EX A Project Location
  - Ex B Concept Site Plan

- February 25, 2021 – Soils Repository Project Update
  - Staff Report
  - Ex A Site Plan

- April 15, 2021 – Purchase of Soil Repository Liner
  - Staff Report

- Cell 1 Earthwork:
  - Bid Advertised – May 1, 2021
  - Bid Opening – May 18, 2021

- Media Coverage
  - June 17, 2020, KPCW Interview –
    - Link to Wednesday's City Manager Interview
  - June 22, 2020 KPCW Interview –
    - Link to City Council Interview

- UDEQ Planning and Regulatory Process:
  - PCMC's application summary:
    - April 27, 2020 – PCMC submitted a Preliminary Location Screening Analysis to UDEQ to initiate consideration of the landfill (p. 251 of permit application)
    - May 22, 2020 – UDEQ evaluated PCMC's Preliminary Location Screening Analysis and concurred the siting criteria accurate and complete, and offered an opinion that the location is suitable to consider a repository
    - December 21, 2020 – Formal application for a landfill submitted
    - January 26, 2021 – Permit number assigned
    - February 26, 2021 –UDEQ determined application complete
    - March 30, 2021 –UDEQ authorized the Park Record and Salt Lake Tribune to publish notice and identified a public comment period from April 5--May 4, 2021
    - May 4, 2021 – UDEQ closed the solicitation period for public comment
  - Landfill Permit Next Steps (as of May 10, 2020) – estimated
    - UDEQ reviews public comments
    - UDEQ issues response to public comments (1-2 weeks)
    - UDEQ publishes requests for additional information/analysis
    - Applicant response period/exemptions
    - Final disposition est. July 2021

2. Next Steps and Public Engagement Opportunities

Council may direct Staff to solicit more public input and conduct additional education efforts.

The following opportunities are available to the public in May:

- May 11, 2020 – Spring Projects Open House
- May 13, 2020 – City Council Work Session – Council will direct staff on additional public education and engagement

The UDEQ permit is under review for several weeks.

UDEQ experts have offered to hold a public information session in Park City.

3. Additional Information

For more information about the history of Park City's mining legacy, please refer to these documents and sources.

- Park City Museum
- From Silver to Gold: A History of Park City Skiing
- Engage Park City Frequently Asked Questions
- Park City Blue Ribbon Soils Commission

4. Project Management Team

Jonathan Weidenhamer
PCMC Economic Development Manager – Owner's Representative. Implements policy direction, responsible for project scope and budget, direct project management staff.

- Notable Past Public Project Experience: Main Street Olympic Celebration, China Bridge Parking Garage,Police Station, PC MARC, PC Library, Old Town/Main Street Improvements, and Walkability Bond implementation including Little Kate, Lucky John, Comstock and the Comstock Pedestrian Tunnel.

Matt Twombly
PCMC Senior Project Manager – project delivery and implementation. Day-to-day oversight UDEQ application, budget, construction and subs, permits and timelines.

- Notable Past Public Project Experience: PC Library, PC MARC, Quinn's Sports Complex and Ice Rink, Old Town Stairs, Skateboard Park, BioCell, Public WorksBus Barn and the Downtown projects including sidewalks, streetscape and Bear Bench, Terigo, and 7th Street Plazas.

Brett Mickelson, P.E.
Cofounder of IGES, Inc. in 1998; igesinc.com. Extensive experience in solid waste industry and siting, design, permitting, construction, and operation of various solid waste management facilities for over 34 years. In addition to experience with Subtitle D (non-

hazardous waste) facilities, experience with RCRA, CERCLA, Mining and various other wastes. Past Recycle Utah Board member.

Bill Loughlin, P.G.
Founded Loughlin Water Associates, LLC in 2005; loughlinwater.com. Experience in hydrogeology and water resources of Park City. Hydrogeologic consulting services in Park City since 1995. Sited, designed, permitted, constructed, evaluated, studied, helped manage, and/or provided water right and litigation support for public water system (PWS) and drinking water, spring, mine tunnels in Park City and surrounding Summit, Wasatch, Morgan Counties.