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Christopher Tressler, PE CFM
Interim Director
5600 East Commerce Avenue
Flagstaff, AZ 86004

August 31, 2021

Heather Provencio
Forest Supervisor
Kaibab National Forest
800 South 6th Street
Williams, AZ 86046

Re: Drake Pozzolan Mine and CR 77, Buggy Wheel Ranch Road

Dear Ms. Provencio:

On behalf of Coconino County Public Works, I am submitting this letter to further comment on the preliminary environmental assessment (EA) for the Drake pozzolan mine development project near Williams, Arizona. The County is supportive of the economic development opportunities this project brings; however, we have serious concerns on the impact this project will have on CR 74, a.k.a. Buggy Wheel Ranch Road.

CR 74 provides the primary access to FR 74, which leads to the proposed mine site. This paved road is already in a stressed state of repair, with a significant decline in use since the closure of the City of Williams landfill. However, this road still plays a vital role to the natural gas compressor station, the USFS field office, County residents, and those recreating in the forest. With the anticipated heavy truck commercial traffic volume that will result due to the Drake pozzolan mine development project, the existing roadway will quickly deteriorate to a state that will be unusable by all.

The County has met several times with the representatives of Drake Cement. Drake has shared with us the expected volume and profile of traffic their operation will be generating on CR 74. As a result of this project we conducted and shared with Drake Cement representatives a geotechnical review and a conceptual estimate for bringing the road to the standard to handle the expected volume.

Our conversations with the Drake representatives have been cordial, but no commitment has been made to fully support the capital investment required to handle the anticipated traffic volume on the road. The County does not have the financial resources to complete the required investment on this Special Use Permit road on its own. We also recognized that we can play a limited role in the full permitting and assessment of the project.



To facilitate an easier partnership, we would like to consider the options of returning CR 74, to Drake Cement or the Forest Service, as a means to directly engage interested parties. This arraignment may help facilitate a more direct link between the mining project, and the abilities to move the process forward.

Again, I want to thank you for your collaboration with the County and the tremendous partnership we have with the Kaibab National Forest. We look forward to engaging with you on an discussion and, if you have any questions, then please contact us.

Sincerely,

A handwritten signature in black ink that appears to read "Christopher Tressler".

Christopher Tressler, Interim Director

CC: Matt Ryan, Chair and Supervisor District 3, Coconino County Board of Supervisors
Lucinda Andreani, Deputy County Manager