



U.S. Environmental Protection Agency, Region 8
James Hou, Remedial Project Manager
Brent Campbell, Community Involvement Coordinator
Via Electronic Delivery— Campbell.brent@epa.gov

June 4, 2026

Re: Richardson Flat Tailings Site EE/CA (April 17, 2026) Comments

Dear Mr. Campbell:

On behalf of Park City Municipal Corporation, I appreciate the opportunity to comment on the Environmental Protection Agency's (EPA) planned construction project within the Silver Creek corridor. In addition to this letter, please see and respond to the attached joint comments, from Park City's and Summit County's land, property and environmental departments, and comments provided by Park City's technical consultant, AECOM.

Park City appreciates EPA's attention to conditions at Richardson Flat Tailings Site and its efforts to protect public health, welfare, and the environment. Our community recognizes the importance of addressing the area's legacy hard rock mine and mill tailings if they may pose a threat. Park City and our neighboring local government, Summit County, share many common interests and concerns for the Silver Creek corridor.

EPA is proposing a large-scale construction project in Park City and Summit County that will affect our community for several years and is raising questions about an issue—legacy mining impacts in Silver Creek—that some people either did not realize the scope and scale of or did not know was a concern for human health and the environment that required EPA intervention at this time.

Our concern with EPA's proposed project is not merely that construction activity will occur. Rather, the concern is that the work will occur repeatedly over an extended period in a highly visible, heavily used, and valued public area. A three-season construction project has the potential to significantly and negatively affect community life, recreation, tourism, and public confidence in the safety and accessibility of the Rail Trail corridor. Those impacts make early, sustained, practical, and effective community engagement essential.

Accordingly, like Summit County, Park City requests that EPA develop and share a robust Community Relations Plan with both governments and the broader community prior to implementing the tailings removal and revegetation project to ensure for our

community an EPA plan that is meaningful, understandable, accessible, and tailored to the expected duration and location of the work. Specifically, we ask EPA to:

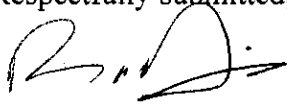
1. Designate and publicize a clear EPA spokesperson and point of contact for the community, so residents, local officials, businesses, visitors, and emergency management personnel know where to direct questions and obtain reliable information.
2. Conduct early interviews with local officials, residents, Rail Trail users, nearby property owners, local businesses, public-interest groups, recreational organizations, and other affected parties to identify community concerns, information needs, seasonal use patterns, and preferred methods for public involvement.
3. Prepare a formal Community Relations Plan (even if belated), and update or supplement that plan as needed during the removal action, given the expected three-season duration of the work.
4. Address the Park City Heights neighborhood, Studio Crossing, Rail Trail and high-use public area directly in the Community Relations Plan, including how EPA will communicate about access restrictions, detours, health and safety precautions, trail-adjacent work, truck traffic, construction schedules, dust control, noise, impacts to wildlife, and changes in public access. The Community Relations Plan should take into consideration the interests of the Spanish-speaking population who live and work in Park City.
5. Establish a local information repository and administrative record file at one or more accessible locations in or near Park City and make materials available for public inspection and copying. We also suggest an online repository for residents and visitors who cannot easily travel to the physical location.
6. Provide clear public notice of the EPA removal Action Memorandum, anticipated construction phasing, expected seasonal work windows, truck routes, staging areas, air monitoring, dust suppression measures, water protection measures, emergency contacts, and anticipated impacts to the Rail Trail area. These details are not identifiable in the EE/CA but are critically important for identifying and addressing community impacts and interests.
7. Maintain ongoing communication throughout the removal action. For a project lasting three construction seasons, we request regular public updates—using local media and information sessions—before each construction season, before major changes in work activity, and whenever work may affect trail access, traffic, parking, recreation, nearby residents, or visitors.
8. Prepare a written response to significant comments that directly addresses concerns raised by residents, local officials, Rail Trail users, nearby businesses, and visitors, including concerns about health risk, air monitoring, dust control, water protection, truck traffic, noise, public access, emergency planning, recreational impacts, and post-removal site management.

Our requests are not intended to delay necessary protective action. Rather, a thoughtful and effective Community Relations Plan will improve EPA's decision-making, build public trust, and help avoid confusion or conflict once work begins. The extended duration of the anticipated removal action and its proximity to residential areas and the Rail Trail make it particularly important that EPA communicate early, clearly, and consistently with those who live near, use, visit, or depend on this area.

Park City stands willing to assist EPA to help ensure EPA's successful engagement with our community. With respect to Park City, please coordinate EPA's planning in this regard with Park City's Property and Environmental Services Manager, Ryan Blair, and Park City's Communication Director, Clayton Scrivner.

Thank you for your attention to these important community relations obligations and for your continued work to protect the residents and visitors of Park City.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Dickey". The signature is stylized with a large, sweeping initial "R" and a long horizontal stroke at the end.

Ryan Dickey, Mayor

Enclosures—AECOM Comments and Joint Park City/Summit County Letter

cc Canice Harte, Chair, Summit County Council