

August 31, 2026

Greg Barnes, Planner
Community & Economic Development Department
4430 South Adams County Parkway, Suite W2000A
Brighton, CO 80601

**RE: EAST REGIONAL LANDFILL EXPANSION
APPLICATION COMMENT SUBMITTALS - AUGUST 2026**

Dear Mr. Barnes;

On behalf of our client, Five Part Development, LLC, American Environmental Consulting, LLC (AEC) submits this response to comments received from Adams County (ADCO) in an email dated August 13, 2026. This third set of comments relate to the requirement to submit a redline version of the new EDOP To show the changes from the original EDOP to this updated and expanded EDOP. The EDOP expansion application submittal package has been updated to incorporate all changes and Adams County comments, as explained in the responses below. The ADCO comments are included in italics and the responses follow. Also included is the ADCO Resubmittal form EXG2026-00002.

Development Review Team Comments

Date: 8/26/2026

Project Number: EXG2026-00002

Project Name: East Regional Landfill Major CD Amendment for Vertical Expansion

Commenting Division: Plan Coordination 3rd Review

Name of Reviewer: Greg Barnes

Date: 08/26/2026

Email: gjbarnes@adamscountyco.gov

Resubmittal Required

Response: The resubmittal is included with this response letter.

Commenting Division: Planner Review 3rd Review

Name of Reviewer: Greg Barnes

Date: 08/26/2026

Email: gjbarnes@adamscountyco.gov

Resubmittal Required

Please see Environmental comment numbered ENV01. This issue surfaced during this review cycle.

Response: A discussion with Mr. Barnes clarified that this comment is related to the submittal of the redline version of the EDOP (as are the others).

Commenting Division: Environmental Analyst Review 3rd Review

Name of Reviewer: Megan Grant

Date: 8/19/2026

Email: MGrant@adamscountyco.gov

Resubmittal Required

ENV3-1. A red-line version of the EDOP will be required for review. Please ensure the red-line version clearly demonstrates all changes approved since 2009 and modifications made to meet regulatory requirements. After discussion with CDPHE, it was determined that the highlighted version of the EDOP is not sufficient and a red-line version will be required. Adams County, CDPHE, and ACHD will need to review this document. Therefore, the major amendment process can not move forward until this documentation is provided.

This was requested with PRE comments and EXG comments. PRE2025-00070 - Requested information submittals for subsequent major permit amendment application: 7. The redlined Engineering Design and Operations Plan clearly showing the proposed changes and all updates made since approval of the CD in 2009 must be submitted for review with the major amendment application.

EXG2026-00002 - First Review Comments - ENV4. Adams County will require submittal of the current, approved Engineering Design and Operations Plan (EDOP), a description of all proposed changes to the approved EDOP with this major modification, and a redlined version of EDOP indicating all proposed changes/modifications for review as part of the major amendment application process. The provided EDOP apparently highlights all changes since 2009, not when or what was changed in the text.

Response: Republic has included the redline in this resubmittal. As we noted during the review process, the original EDOP and this expansion EDOP document are significantly different in both content and layout, such that the redline document is difficult to read and compare to the original 2006 Doty EDOP. As a result, and in order to make the changes from the 2006 document to this expansion (and full update) EDOP simpler to follow, Republic added the highlighted version and the memo discussing the changes and when they were made. We presume you have the 2006 Doty and Associates EDOP but we also added the main text from this document to help understand the changes more easily as well.

The resubmittal includes the full application document with revisions to the Table of Contents and bookmarks for the various sections.

Commenting Division: Application Intake 3rd Review

Name of Reviewer: Kevin Mills

Date: 8/11/2026

Email: KMills@adamscountyco.gov

Complete

Response: Review complete. No response required.

Commenting Division: Plan Coordination 2nd Review

Name of Reviewer: Greg Barnes

Date: 07/01/2026

Email: gjbarnes@adamscountyco.gov

Resubmittal Required

Response: The resubmittal is included with this response letter.

Thank you.

Respectfully Submitted

AMERICAN ENVIRONMENTAL CONSULTING, LLC

Curtis Ahrendsen
Project Manager/Principal

cc: Melissa Montgomery, Five Part Development, Inc.

Attachments

1. Adams County Resubmittal Form EXG2026-00002



Re-submittal Form

Case Name/ Number: _____

Case Manager: _____

Re-submitted Items:

- ☐ Development Plan/ Site Plan
- ☐ Plat
- ☐ Parking/ Landscape Plan
- ☐ Engineering Documents
- ☐ Subdivision Improvements Agreement (Microsoft Word version)
- ☐ Other: _____

*** All re-submittals must have this cover sheet and a cover letter addressing review comments.**

Please note the re-submittal review period is 21 days.

The cover letter must include the following information:

- Restate each comment that requires a response
- Provide a response below the comment with a description of the revisions
- Identify any additional changes made to the original document

For County Use Only:

Date Accepted:

Staff (accepting intake):

Resubmittal Active: Planner; Environmental; Health; Plan Coordination

Planner to refer to CDPHE, as well.