

Exhibit A-03: M. Bray & J. Day letter
re: Mitigated Determination of
NonSignificance for proposed Grip
Road Gravel Mine File #s PL16-0097
&
PL16-0098 (April 29, 2021)

April 29, 2021

Michael Cerbone, Assistant Director
Skagit County Planning and Development Services
1800 Continental Place
Mount Vernon, WA 98273

RE: Mitigated Determination of NonSignificance for proposed Grip Road Gravel Mine
File #'s PL16-0097 & PL16-0098

Dear Mr. Cerbone,

Central Samish Valley Neighbor's attorney, Kyle Loring, is submitting comments on behalf of our group regarding the recently re-issued MDNS for the proposed Grip Road Gravel Mine. That letter provides a more comprehensive review of our concerns regarding this SEPA review process, and we fully support its findings. However, we are also submitting a few additional comments directly to express our concern with the state of this application and permit review process.

Even though this project has supposedly been under review by PDS for more than five years, it appears that very little has changed about the original proposal, especially in terms of protection of the natural environment. In fact, none of the assessments and application documents related to protection of fish, wildlife, and air and water quality have been updated (except the 2017 "Addendum to the Fish and Wildlife Assessment further evaluating ESA listed species", wherein there is a clear disclaimer stating that the addendum is not intended to address requirements of the ESA). The SEPA documents were incomplete and inaccurate in 2016-2017 and they still are. Further, it appears that the County has ignored almost all of the concerns expressed by the community on these matters over the past years. We acknowledge the County's efforts to provide better information regarding traffic and public safety impacts, however the additional traffic analysis has obvious, glaring omissions and the proposed mitigation falls far short.

And, now, there seems to be a rush to push through a new Threshold Determination without truly taking into consideration new public comment (as indicated by publishing the deadline for a SEPA appeal prior to even receiving public comment on the MDNS). This does not feel like a sincere effort at public process.

The volume of information referenced in the MDNS serves mostly to confuse and obfuscate. We have spent countless hours poring through these documents trying to understand what the applicant really proposes to do. And yet, we still don't know how many daily truck trips to expect (presumably somewhere between "46 per day" and "30 per hour"). We are still confused about whether the applicant will adhere to "normal" or "extended hours" scenarios; or, whether they plan to haul during peak traffic hours or not. In addition, if they are allowed to haul during peak hours and/or at volumes up to 30 per hour, why doesn't the MDNS specifically state this and require appropriate mitigation measures? With the modest requirement to fix some of the most glaring safety hazards on Prairie Road prior to using trucks with trailers, we are now confused as to whether they will run more single trucks until this work is completed, or if they might use 'alternative haul routes' instead – potentially generating even larger number of truck trips and/or new haul routes that haven't been evaluated at all for safety concerns. In fact, we still don't know what the haul route will be, with the MDNS simply stating that material will be "transported to nearby facilities for processing or sold directly to market".

We still find no mention in the traffic analyses of dozens of trucks per day added to the narrow steep “S” curves on the Grip Road hill. Community members have repeatedly expressed the danger of school buses, farm equipment and commuters encountering tandem gravel trucks here, yet it is not even mentioned, let alone evaluated. We find it bewildering that the County has still not required the applicant to clarify these issues.

We don’t even know if the County will require a 300-foot buffer on the Samish River, even though this is clearly required by the County’s CAO. And, we still don’t understand why the applicant wasn’t required to conduct an environmental review of the entire footprint of the project, including the two-mile long private haul road that is clearly integral to the project, with approximately 12,000 truck trips annually traveling on it.

This is an industrial scale development located in a vibrant rural community and a sensitive watershed, where no commercial mining anywhere near this scale has occurred. The applicant and the County still don’t seem to grasp the magnitude of impact and permanent change this proposal would cause to the place we call home. Before this proposal moves forward, the County needs to reverse its Threshold Determination under SEPA, and require a full Environmental Impact Statement that fully evaluates the impacts, appropriate mitigation, and identifies scaled back alternatives.

Thank you for your time and consideration.

Sincerely,



Martha Bray & John Day
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