

Exhibit A-38: D. Gresham, Ecology
Comments on the Grip Road Gravel
Mine; Project File # PL16-0097 (Dec.
23, 2016)

John Cooper

From: Planning & Development Services
Sent: Tuesday, December 27, 2016 9:45 AM
To: John Cooper
Cc: Betsy D. Stevenson
Subject: FW: PDS Comments

From: website@co.skagit.wa.us [<mailto:website@co.skagit.wa.us>]
Sent: Friday, December 23, 2016 9:45 AM
To: Planning & Development Services
Subject: PDS Comments

Name : Doug Gresham
Address : 3190 160th Ave SE
City : Bellevue
State : WA
Zip : 98008
email : doug.gresham@ecy.wa.gov
Phone : (425) 649-7199
PermitProposal : PL16-0097
Comments : December 23, 2016

John Cooper, Natural Resource Planner
Skagit County Planning and Development Services Department
1800 Continental Place
Mt. Vernon, WA 98273

RE: Ecology Comments on the Grip Road Gravel Mine
Project File # PL16-0097

Dear Mr. Cooper:

As the Washington State Department of Ecology (Ecology) Wetland Specialist responsible for Skagit County, I wish to have the following comments entered into the record for the Grip Road Gravel Mine. In addition to my previous comments for this project submitted on June 1, 2016, I want to address additional concerns during this second public notice period.

Concrete Nor'west submitted an application for a forest practice conversion and mining special use permit to develop a gravel mining operation. This 68-acre property consists of three lots (Parcels P125644, P125645, and P50155) that are located northwest of Sedro Woolley in unincorporated Skagit County. The property is located north of Grip Road, south of Prairie Road, and is bisected by the Samish River. The Skagit County iMAP shows the Samish River flowing across the northeast corner of the property in the Warner Prairie area.

The proposed action involves harvesting approximately 50,000 board feet of timber, removing the stumps, and converting the property to a gravel mining operation. This gravel mining operation will remove approximately 4,280,000 cubic yards of gravel over a 25 year period. Gravel will be removed by truck and trailer (generating about 46 truck trips per day) to one of Concrete Nor'wests nearby facilities for processing.

I have a concern with the wetland findings by Graham-Bunting Associates. They stated there will be a 200' setback from riverine wetlands associated with the Samish River. However, if these wetlands are rated as either Category I or II, then the standard buffer width may be 300' for a high land use intensity such as a gravel mine (Skagit County Code 14.24.230). We assume the proposed footprint of the gravel mine would encroach into this larger wetland buffer so this needs to be addressed.

I also have a concern with the access road that will need to be improved to accommodate 46 truckloads a day, which could impact wetlands and streams. This access road may need to be widened, the Swede Creek bridge may need to be upgraded, and storm water drainage features may need to be reconfigured. This access road would need to be upgraded to Skagit County higher standards for roads servicing mining operations but this was not addressed.

Any wetlands that occur on the property would be waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. If any wetland impacts do occur, the applicant shall obtain all necessary state and federal authorizations prior to beginning any ground-disturbing activities or vegetation removal.

If you have any questions or would like to discuss my comments, please give me a call at (425) 649 7199 or send an email to Doug.Gresham@ecy.wa.gov.

Sincerely,

Doug Gresham, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program

From Host Address: 198.239.77.118

Date and time received: 12/23/2016 9:44:17 AM