

April 28, 2021

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

RE: Mitigation Determination of Non Significance for proposed Grip Road Mine
File# PLL16-0097 & PL16-0098 – Impacts to the Natural Environment and ESA
species.

“Daddy Listen! All you can hear is birds!” This was a profound observation from my 9 year old daughter two days ago as we were out walking in our neighborhood mid-morning. This is why we moved to the Central Samish Valley. This, if Concrete ‘NorWest has its own way, will all change – forever.

The initial proposal is for a 60+ acre open pit gravel mine for a foreseeable lifespan of 25 years. That is a long time – what has not been noted is that this “small” gravel pit is part of a 700+ acre (37+ Parcels) owed by Concrete ‘NorWest/Miles Sand and Gravel cover company Lisa Inc., forested region bounding the Samish River that will inevitably be developed in the same way over time as each area is exhausted of its natural resource. A never ending source of noise, dust, water table disruption, habitat destruction, and river disruption (you can say it won’t, but this can’t be known ahead of time.)

Perhaps you don’t know the sounds of silence, the un-interrupted sounds of the natural world surrounding you, un-marred by the sounds of chainsaws, heavy machinery, trucks, conveyers, and associated mining equipment. Perhaps your life is surrounded by the noise of urban existence. Where we live, the Central Samish Valley, silence is the norm, and that is why we, and our neighbors, have chosen to live in this peaceful valley. You may have no context except for the incessant sounds of humanity on the move (I-5, Emergency Vehicles, Large Truck Traffic, Heavy Machinery, the constant background of Television and newscasts, ever present music). Silence of humanity and the sounds and presence of the natural world are a precious commodity, one which is a most valuable resource, and treasured aspect of our community. Our citizens live here for this reason, a place to escape the din of society. Many work in urban settings and find their homes their safe place and retreat. This is being threatened.

In conversations with neighbors there is evidence of early Tribal presence in this region (a clovis point being noted as being found in the river bed of the Samish River in the region of the proposed mining operation). This operation is also not congruent with the Clean Samish Initiative (CSI) that the county has promoted for years in efforts to improve river water quality for fish and shellfish at the mouth of the Samish River. Wildlife need extensive tracts of space to thrive, while walking with friends in the vicinity, a coyote and bobcat were both seen in the space of 30

min. Reports of other significant wildlife making this area home abound (Cougar, Bear).

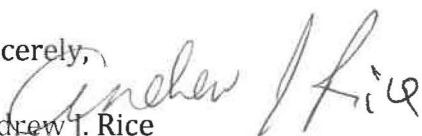
Specific Points to Consider:

- **9-5 Safety Corridor Project:** Prairie Rd from I-5 to HWY 9 is a main traffic corridor from East county and has a long history of traffic incidents. Added tandem truck traffic will not improve this.
- **Environmental Review Lacking Scope of Impact:** Ignores larger plans for future development of mining operations of adjacent 700 acres owned by same entity (LISA Inc aka Concrete 'Norwest). Fish bearing Swede Creek not included and approx 11,000 tandem truck trips annually along the haul road corridor.
- **Labeled as Grip Rd. Mine – Ignores other regional affected Parties** Prairie Lane, Prairie Rd, Wildlife Acres, Hoogdal, Cedar Ridge Place, F&S Grade, and adjacent communities from Hwy 9 – I-5.
- **Critical Area Ordinance misalignment:** 300' buffer required in high intensity land use areas. Only 200' buffer noted in Fish and Wildlife Assessment
- **Oregon Spotted Frog Habitat Infringement (*Rana pretiosa*):** Listed as Threatened species under the Endangered Species Act. And Endangered in Washington. Local populations have been noted in adjacent sites to proposed mine activity.
- **No Wetland delineation:** There are significant wetlands in the proposed area that have not been noted or buffered. Beaver activity has been noted.
- **Groundwater Impacts not adequately evaluated:** A common outfall of mining is groundwater disturbance. Conversations with landowners adjacent to other county mines (old 99) reflect noticeable water changes accompanied by mining operations. Well integrity must be preserved. Additionally mine contaminants must not enter the Samish River.
- **Noise and Vibration Study lacking real life impacts.** Not only truck traffic on the exit roads but also the ambient noise of operation to the whole Central Samish Valley and Warner Prairie communities was not considered although of substantial impact to residents.
- **Emissions of operation:** Diesel fumes, dust from traffic and operation from 240,000 miles of annual truck traffic – not to mention additional air pollution from heavy equipment involved in direct extraction.
- **No Assessment of regional cumulative long term impacts:** Twenty-five (25) years is not a “temporary” activity. Especially given the potential continual development of the remaining 700 acres for similar use (100's of years of use).
- **Poor planning on location of proposed facility:** In a land tract of 700 acres the proposed mine is in the highest impact space adjacent to homes, sensitive wetland, forest, and riparian habitats. With transit of material through a major portion of the land tract.

In short, please reverse the current Threshold Determination under SEPA, and require a full Environmental Impact Statement that addresses the above and other areas of concern noted in others comments. Including a Level II Traffic Impact Analysis (TIA). Having the company pay for road improvements may amount to a simple bribe to move forward. There is much more at stake than the simple financial interests of Concrete 'Norwest, Miles Sand and Gravel and Skagit County. Our quality of life and the desirability of our valley and neighborhood, where we raise our families, is at stake.

Thank you for your heartfelt consideration.

Sincerely,


Andrew J. Rice
22356 Prairie Rd
Sedro Woolley, WA 98284



April 30, 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

(Submitted via www.skagitcounty.net/pdscomments)

Dear Mr. Cerbone,

Thank you for the opportunity to comment on the Mitigated Determination of NonSignificance (MDNS) for the proposed gravel mine on the Samish River near Grip Road. Since 1995 Skagit Land Trust has owned and cared for Tope Ryan Conservation Area, an important natural site along Grip Road approximately 2 miles downstream of the proposed mine. This preserve has long included 900 feet along the Samish River. The Trust also protects two other Samish River properties upstream of the project site and is continually seeking to protect more land along this important watercourse. All of Skagit Land Trust's properties along the Samish have been donated by landowners who wanted to protect the natural habitat of the river and its shoreline. We have partnered with federal, Tribal, state, and local agencies on numerous projects to protect and restore habitat in the Samish watershed. These partnerships include excellent work conducted by Skagit County Public Works Clean Samish Initiative, Skagit Fisheries Enhancement Group, and others.

Last year, Skagit Land Trust received a donation of land significantly expanding Tope Ryan Conservation Area on the other side of Grip Road protecting an additional 900 feet of shoreline along the Samish River and Swede Creek including their confluence. The river and creek in the vicinity of the conservation area are of particular importance for juvenile salmon due to the habitat complexity of the site. The river's wide gravel bars are critical spawning grounds for Coho and Chum Salmon as well as Steelhead and Cutthroat Trout. Last year, the latest restoration planting project at Tope Ryan added over 5,000 trees and shrubs. The costs of this effort were covered by the National Estuary Program, administered by the Washington State Department of Ecology with assistance from the U.S. Environmental Protection Agency. The Skagit Conservation District prepared the planting plan and helped secure a federal partnership grant to maintain the plantings. I mention these details to make the point that this is a preserve made possible and continually improved by the generosity of private landowners supplemented by public funds and the dedication of many staff and volunteer hours over a long span of years. The potential for adverse impacts from a nearby mine and associated heavy truck traffic greatly concerns us and could directly affect our ability to meet our responsibility to protect this significant area of habitat.

Each year the Trust organizes community volunteers to conduct amphibian monitoring at the Tope Ryan site, gathering significant data about the wetlands which we convey to Washington Department of Fish and Wildlife. We hope to someday discover that the endangered Oregon Spotted Frog has returned to this site, given its appropriate habitat for this now rare species present elsewhere in the Samish Watershed. Tope Ryan is a rich area laced with beaver ponds, important not only for native amphibians but also for a rich assemblage of riparian dependent songbirds and waterfowl. It also supports commercially important fish stocks. In addition, restoring and protecting this large riparian area helps protect water quality in the river that is so important for commercial shellfish grown in Samish Bay. Potential river degradation due to the proposed mine and haul road puts a long list of values at risk.



P.O. Box 1017, 1020 S Third Street, Mount Vernon, WA 98273 Voice 360.428.7878 Fax 360.336.1079

www.skagitlandtrust.org

One of the lessons we have learned from years of restoration work is that protecting habitat is far more cost effective than restoring it after the fact. In addition, there are factors contributing to habitat degradation that are more subtle than direct impacts, but perhaps even more concerning. For instance, Swede Creek routinely spills over its banks into the ditch along Grip Road by the Tope Ryan property. This has created a cascade of effects including accelerated erosion of the roadbed, routine flooding of the road and increased sediment loading in the creek and river. Skagit Land Trust staff and volunteers have on several occasions discussed with staff at Public Works various ideas for “fixing” the creek; but have yet to arrive at a cost effective and feasible plan to solve this problem. The volume and type of truck traffic that would be using the haul road crossing Swede Creek could well add to the present problem.

The Trust is concerned that the impacts of the proposed mine have not been adequately evaluated, nor we will look back and wish we had considered taking stronger measures to prevent the ongoing unraveling of important habitats in the Samish Watershed. Further review of the impacts to the riparian habitat and associated wetlands along the river should be conducted with special attention to Oregon Spotted Frog and Bull Trout habitat, both listed species.

Under Skagit County’s Critical Areas Ordinance it would be appropriate to require a 300’ buffer, rather than 200’, between the Samish River and the mine, clearly an industrial activity calling for this larger buffer. A larger buffer would provide greater assurance that the mining will not in fact degrade the river through sedimentation, erosion, and leaching of spilled fuel oil (noting the statement in the application materials that fueling of equipment will take place on site). We are also concerned that the plan to maintain the floor of the mine at least 10’ above the water table, while well-intended, lacks certainty. There should be a more thorough analysis of the site hydrology through the seasons and of how it will be affected by the mining plan.

In addition, as mentioned, there are issues with Swede Creek just downstream on Trust property, and yet it appears that the impacts to the creek from heavy truck traffic on the private haul road have not been evaluated. The haul road crosses Swede Creek approximately 0.6 stream miles above Land Trust property. Sedimentation from this unpaved road would likely degrade the salmonid habitat downstream which we have been working for years to protect. We are also aware that there are beaver ponds and wetlands near the haul road and that the environmental review did not take these sensitive habitat areas into account.

The projected numbers of heavy trucks on this haul road are significant and will permanently change the nature of the forested upland habitat on the site. Local residents report that the uplands on the property are used by bear, cougar, and bobcat. Signs of these animals have also been observed on the Trust’s nearby property. These animals require large territories, and the applicant’s property is the last large undeveloped tract of land so close to the Samish River in this part of the watershed. The impacts from this disturbance to these important upland wildlife species should be evaluated.

We also have concerns related to the safety of staff, volunteers, and visitors to Tope Ryan Conservation Area in light of the heavy and frequent truck traffic which would be associated with the mine. Trucks entering Grip Road would pass the conservation area as they approach the turn onto Prairie Road. Vehicles using the preserve’s small parking area will be at very significantly increased risk of collision as they pull into or out of the limited space. The conservation area lies on both sides of Grip Road. Pedestrians crossing from one part to the other will also be in the path of trucks approaching or leaving the mine.

Skagit Land Trust is not opposed to resource extraction; however, these uses must be balanced with effective measures to protect public resources, such as the Samish River, private ones such as Tope Ryan

Conservation Area, and public safety. In addition, the Trust staff would be happy to discuss conservation options with the landowner to address some of these concerns.

Before recommending approval of the Grip Road Gravel Mine application, please conduct further evaluation to ensure measures are taken to adequately protect the natural habitats of the Samish watershed that all of us are working so hard to restore. We ask that you do this by withdrawing the MDNS and requiring a full Environmental Impact Statement with thorough consideration of project alternatives and a more complete scope of mitigations than in the MDNS. It is essential that this analysis include not only the mine site itself but also the area traversed by the haul road, the downstream reaches of the Samish River and Swede Creek, and areas adjacent to the public roadways the trucks would use.

Again, thank you for the opportunity to comment, and for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Hitchcock". The signature is written in a cursive, slightly slanted style.

Mark Hitchcock
President
Skagit Land Trust

April 24, 2021

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

Re: Concrete Nor'west/Miles Sand & Gravel; PL16-0098, Notice of Withdrawn and Re-Issued Mitigated Determination of Non-Significance (MDNS)

Dear Mr. Cerbone,

Thank you for this opportunity to comment on Skagit County's recently reissued MDNS regarding the mine development application of Miles Sand and Gravel.

I have recently become aware of the extent of this project, and of the many concerns regarding a lack of complete and up-to-date study on the environmental and public impact it would have.

We live within ten minutes of this land, and my son lives in the neighborhood. For over twenty years, with the kind permission of landowners in the area, we have walked at least weekly on acres of forested land off of Grip Road. We know the roads well, and we have come to know the diverse wildlife of that area. Cougar, bobcat, bear, porcupine, even otter—we have seen their signs, their tracks and sometimes the animals themselves. The area is rich with wildlife that requires large territories, accessible corridors and minimal disturbance.

The adjacent Samish river and wetlands are also rich with life, including the Oregon Spotted Frog, designated endangered by the state and threatened federally. The Bull Trout, another species listed as threatened on federal lists also has critical habitat on this river. It is my understanding that the Fish and Wildlife Assessment used in issuing the MDNS was limited, and over five years old. Additionally, the MDNS does not mention endangered status species. State and federal agencies addressing endangered species need to be consulted.

I am additionally disturbed that, in order to sanction this project, which has not been thoroughly examined, the County would make an exception to allow only a 200 foot buffer, even though its own Critical Areas Ordinance (CAO) requires a 300 foot buffer adjacent to high intensity land use. Everything I have learned about this project argues that it will be high intensity: a 60 acre mine site on 700 contiguous acres, going 90 feet deep, with over 11,000 heavy truck trips per day for 25 years. I would hope that an exception to the CAO for such a high impact proposal would only be made in extreme circumstances, after extremely careful study.

In addition to the environmental impacts (of which I've only listed a few), I have deep concerns about how this project will detrimentally affect the safety and infrastructure of the roads. I have pulled out onto Grip Road thousands of times—in places, it is twisting, steep and narrow, with limited visibility. The safety impact of dozens, perhaps hundreds, of trucks daily on this road is alarming. I understand that the Traffic Impact Analysis located lane encroachment on this route, including on the twisting Grip Road hill spots, but neither the TIA nor the MDNS analyzes or mitigates this problem. This is a (fatal) accident waiting to happen. I can't visualize how these trucks and school buses will negotiate passing on these roads. It is imperative that the County insists on additional information and assurances on this issue.

It is important to note, that although Miles Sand and Gravel suggests an average 46 truck trips per day (already substantial), the company says it might run up to 30 trucks per hour. This is not an unlikely scenario given the seasonal nature of the business. The impact of such heavy traffic, or even anything approaching it, would be substantial on road safety, but also on road infrastructure. Impacts on infrastructure also need to be evaluated, and provision should be made for the applicant to pay a fair share of cost for maintenance and repairs if the project is approved.

In closing, the Grip Road/Prairie Road area is currently a beautiful example of rural neighborhood in the County, dotted with small farms and residences, a place where wildlife, forests, pastures, river and people coexist. This is the kind of land and land use that the County often promotes with great pride. An application to substantially change its character, its safety, and its multi-use function for all species should be assessed with all of the tools that the County has in place, including state and federal metrics.

Please reverse the Threshold Determination under SEPA, require a full Environmental Impact Statement to evaluate environmental fallout from this project, and fully examine the public safety and quality of life impacts of this proposal.

Sincerely,


Beverly Faxon

20757 Anderson Road
Burlington WA 98233

April 27, 2021

Comments Re Grip Road Mine Proposal, reference PL 16-0097 and PL 16-0098

Traffic, Road and Public Safety Issues Not addressed in the MDNS:

County government and the concerned public cannot evaluate the traffic safety impacts of the project and the adequacy of the MDNS without the following information:

- **The maximum number of truck trips per hour, how often the number of trips may exceed the average trips per hour, and how long the number of trips may exceed that average.** The average of 46 trips per day or 4.6 trips per hour given in the MDNS is meaningless due to the seasonal nature of product demand. The applicant's October 8, 2020 Traffic Impact Analysis (TIA) proposes a maximum of 60 trips per hour (30 trucks in each direction). The SEPA determination must evaluate the traffic safety impacts of the project based on this maximum and set hard limits on this number, frequency, and duration
- **A clear definition and map(s) of all haul routes, and the limitation of mine traffic strictly to the defined routes.**
- **Safety analysis of all haul route intersections and road segments to determine whether or not trucks traveling to and from the mine will stay within their lane of traffic, and the mitigation measures to be required for every location where they will not.** The TIA provides analysis showing that truck and trailer combinations cannot traverse the two sharp curves on Prairie Road east of Old Highway 99 without encroaching on the opposing lane of traffic. The MDNS requires the applicant to take specific actions to mitigate this issue at this location. The TIA acknowledges that the same issue of lane encroachment exists at several other locations on the haul route, but neither it nor the MDNS lists those locations, provides any analysis of the problems there, or sets out the mitigation measures required to correct them. These locations include, among others, the S-curves on the Grip Road hill and practically all of the intersections on the haul route. This is unacceptable.
- **Projections for the increase in non-mine traffic on the haul routes over time and evaluation of the safety and road capacity impacts of mine traffic with increased non-mine traffic.** The TIA uses 2020 traffic levels to evaluate mine traffic impacts and does not factor in growth.
- **Field studies to determine the speeds at which vehicles are currently traveling on the haul route and evaluation of how mine traffic will impact existing traffic given those speeds.**
- **More thorough evaluation of the accident records for all road segments and intersections on the haul route, including the contributing causes for the accidents. What are the implications for mine traffic safety?**
- **Determinations as to the actual safe speeds for any given road segment or intersection on the haul route, along with recommendations for changes to legal speed limits where they are needed for safety.**
- **More detailed evaluation of sight distances at all intersections, including "Vision Clearance Triangle" drawings as shown in Skagit County Road Standards, 2000, Appendix C – 7.**
- **A full evaluation of what the warning beacon systems proposed for the Grip Road/Prairie Road and Grip Road/Mine Entrance intersections are intended to accomplish and how they will do so.** Drivers are clearly ignoring the existing speed warning signs at Grip and

- Prairie. How can they be expected to slow down adequately for the warning beacons?
- **“Third party” sales at the mine would mean trucks traveling to and from the site via every route possible. Disallow third party sales from the mine.**
 - **Adding heavy mine traffic to our existing, substandard roads will cause increased damage to public infrastructure and higher maintenance costs.** These impacts must be evaluated and the applicant required to pay their proportional share of the costs. An important example is the slumping shoulder and roadway on the south side of the Grip Road hill S-curves, which have required frequent repairs over the last few years just with existing traffic levels.
 - **Pedestrian and bicycle safety must be evaluated along the entire haul route.** This is a particular concern in areas where there are no shoulders on Grip and Prairie, and where guardrails were recently installed on Prairie Road. Necessary safety improvements must be required.
 - **Railroad crossings along the haul route will need to be beefed up.** They already require upgrades every 5 years with the current traffic levels.
 - **School buses are along the haul route.** The school buses should be fitted with safety belts and the school bus driver must be responsible for ensuring the children are buckled up.
 - **Traffic enforcement is almost non-existent along the long haul route today.** Funds must be set aside to increase manpower and equipment to ensure road safety and traffic law monitoring.

Environmental Concerns Not Addressed in the MDNS

The environmental review did not consider the full footprint of the project. The applicant owns more than 700 contiguous acres, however only the 60-acre mine site was included in the environmental review, even though industrial hauling will occur on the two-mile long private road that transects their larger ownership. The proposal will require more than 11,000 truck trips per year on this haul road. This private road has previously been used only for forestry. It is adjacent to wetlands and crosses Swede Creek, a fish bearing stream. These sensitive areas were not evaluated and no mitigation was proposed.

The County is not following its own Critical Areas Ordinance (CAO). Currently only a 200-foot buffer is recommended in the Fish and Wildlife Assessment, even though the CAO calls for 300-foot adjacent to high intensity land uses. Industrial scale mining is definitely a high intensity land use.

The Fish and Wildlife Assessment is out-of-date and incomplete. The limited Fish and Wildlife Assessment provided by the applicant is more than five-years-old, and the river and associated wetlands have changed. Designated habitat for the Oregon Spotted Frog has been identified in the Samish River adjacent to the mine site; this animal is listed as “Endangered” in Washington State and “Threatened” federally. In addition critical habitat for Bull Trout is located just downstream, Bull Trout is a “Candidate” species for listing in WA State, and is listed as “Threatened” federally. The MDNS does not mention these “ESA” species nor any protective measures necessary. Furthermore, state and federal agencies responsible for protecting endangered species need to be consulted.

Wetlands were not delineated, and there is no requirement for surveying and permanently marking them. A full wetland delineation was never done. Sensitive areas and buffers within the entire project area (not just the mine site itself) need to be identified so that operators and regulators know where they are.

Wildlife corridors are not identified and protected. Deer, cougar, bear, coyote and bobcat are known to use the site, and it is the last large tract of undeveloped land between Butler Hill to the south,

the Samish River and Anderson Mountain to the north. These animals require large territories and are sensitive to disturbance.

A drainage plan was not required to protect water quality from runoff on the private haul road.

Without a drainage plan that identifies treatment measures for runoff from the haul road, the high volume of truck traffic is likely to cause excess sedimentation and potentially contamination from petroleum products to pollute surface water flowing into Swede Creek, Samish River and Samish Bay.

Impacts to groundwater are not adequately evaluated and protections measures are not required. They intend to excavate the mine to within 10 feet of groundwater. They claim that all runoff from the disturbed site will drain into the mine, and infiltration will protect the groundwater. But it is unclear how that ten-foot limit is determined, nor how they will avoid penetrating the water table. No mention of seasonal fluctuation of the groundwater is discussed. Furthermore, with the pervious nature of sand and gravel, it is unclear if ten feet is sufficient to filter out contaminants such as petroleum product spills. The groundwater at the site is essentially at the level of the Samish River and flowing directly into it, with potential to contaminate the river. \Our Community Well currently has VERY GOOD water and we have every right to have that quality maintained.

The Noise and Vibration Study did not use realistic scenarios to model noise impacts. The assumptions regarding the number and size of equipment that will be operated on the site are vague and misleading. It modeled noise levels generated from “typical” and “average” mine production, not maximum noise levels. The study did not address the significant noise fully loaded trucks will generate using compression brakes descending Grip Road Hill and the Swede Creek gorge on the private haul road. Regardless of legal noise limits, all of this will be a major change to the soundscape for residents of the area that should be taken into account in a full EIS.

Emissions were not evaluated and no mitigation plan was required. Air pollution from the mining equipment and hauling has not been evaluated, even though hauling the material involves a minimum of 240,000 cumulative miles per year driven by diesel gravel trucks.

Cumulative impacts were ignored. This is a major industrial scale proposal that would create many cumulative impacts, both on-site and off-site. No off-site impacts were evaluated. Twenty-five years of mine operation is not a “temporary” activity. It will permanently change the character of the landscape and the surrounding neighborhoods, degrading wildlife habitat and fish bearing streams. To haul the amount of material proposed to the closest site for processing, requires driving diesel trucks more than 5,500,000 cumulative miles over the 25 year period. A full EIS needs to evaluate all cumulative impacts.

Although we have asked several times to be placed on the mailing list for these 2 permits, we have yet to receive any information from the county officers. We would GREATLY APPRECIATE having our names added to the list.

Thank you fo ensuring these issues are dealt with to our satisfaction.

H.E. And 4/27/2021

Herb and Debra Anderson

7374 Erna Lane

Sedro Woolley, WA 98284

deb_janderson@hotmail.com

Debra Anderson
4/27/2021

April 28, 2021

RECEIVED
APR 29 2021
SKAGIT COUNTY
PDS

Comments Re Grip Road Mine Proposal, reference PL 16-0097 and PL 16-0098

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The County is not following its own Critical Areas Ordinance (CAO). Currently only a 200-foot buffer is recommended in the Fish and Wildlife Assessment, even though the CAO calls for 300-foot adjacent to high intensity land uses. Industrial scale mining is definitely a high intensity land use.

The Fish and Wildlife Assessment is out-of-date and incomplete. The limited Fish and Wildlife Assessment provided by the applicant is more than five-years-old, and the river and associated wetlands have changed. Designated habitat for the Oregon Spotted Frog has been identified in the Samish River adjacent to the mine site; this animal is listed as “Endangered” in Washington State and “Threatened” federally. In addition critical habitat for Bull Trout is located just downstream, Bull Trout is a “Candidate” species for listing in WA State, and is listed as “Threatened” federally. The MDNS does not mention these “ESA” species nor any protective measures necessary. Furthermore, state and federal agencies responsible for protecting endangered species need to be consulted.

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A drainage plan was not required to protect water quality from runoff on the private haul road.

Without a drainage plan that identifies treatment measures for runoff from the haul road, the high volume of truck traffic is likely to cause excess sedimentation and potentially contamination from petroleum products to pollute surface water flowing into Swede Creek, Samish River and Samish Bay.

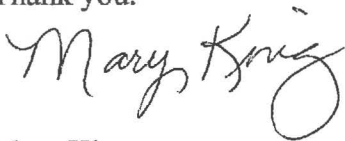
Impacts to groundwater are not adequately evaluated and protections measures are not required. They intend to excavate the mine to within 10 feet of groundwater. They claim that all runoff from the disturbed site will drain into the mine, and infiltration will protect the groundwater. But it is unclear how that ten-foot limit is determined, nor how they will avoid penetrating the water table. No mention of seasonal fluctuation of the groundwater is discussed. Furthermore, with the pervious nature of sand and gravel, it is unclear if ten feet is sufficient to filter out contaminants such as petroleum product spills. The groundwater at the site is essentially at the level of the Samish River and flowing directly into it, with potential to contaminate the river. \Our Community Well currently has VERY GOOD water and we have every right to have that quality maintained.

The Noise and Vibration Study did not use realistic scenarios to model noise impacts. The assumptions regarding the number and size of equipment that will be operated on the site are vague and misleading. It modeled noise levels generated from “typical” and “average” mine production, not maximum noise levels. The study did not address the significant noise fully loaded trucks will generate using compression brakes descending Grip Road Hill and the Swede Creek gorge on the private haul road. Regardless of legal noise limits, all of this will be a major change to the soundscape for residents of the area that should be taken into account in a full EIS.

Emissions were not evaluated and no mitigation plan was required. Air pollution from the mining equipment and hauling has not been evaluated, even though hauling the material involves a minimum of 240,000 cumulative miles per year driven by diesel gravel trucks.

Cumulative impacts were ignored. This is a major industrial scale proposal that would create many cumulative impacts, both on-site and off-site. No off-site impacts were evaluated. Twenty-five years of mine operation is not a “temporary” activity. It will permanently change the character of the landscape and the surrounding neighborhoods, degrading wildlife habitat and fish bearing streams. To haul the amount of material proposed to the closest site for processing, requires driving diesel trucks more than 5,500,000 cumulative miles over the 25 year period. A full EIS needs to evaluate all cumulative impacts.

Thank you.



Mary King

7366 Erna Lane

Sedro Woolley, WA 98284

marking43@frontier.com

22 April, 2021

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

Dear Mr. Cerbone,

I am writing to comment on the County's April 15, 2021 Mitigated Determination of NonSignificance under SEPA re the gravel mine application by Miles Sand and Gravel along the Samish River off of Grip Road.

Let me say first of all that I do not live near the location of the proposed gravel mine, so this is not a NIMBY reaction. Rather, my reaction is one of astonishment that the county considers this proposal non-significant under SEPA. I love this county and am shocked at what appears to me to be utter disregard of various impacts of this proposal.

While I do not live near Grip Road, I have driven it many times. It is a winding road full of 90-degree and S-turns. It already feels treacherous to drive that road and I cannot imagine the danger of daily (perhaps hourly) adding scores of huge, loaded trucks to that already precarious road. If my grandchildren lived on Grip Road, I would be terrified about their daily school bus rides (hurray for daily school!). And I am also worried about kids who are not my grandchildren.

But besides the issue of road dangers, there is much else that I find concerning:

- The proposal does not meet the 300-ft buffer required by the Critical Areas Ordinance for such a high-intensity land use.
- The Fish and Wildlife Assessment provided by the applicant is more than five-years-old and needs updating. There is wildlife in this area!
- There is no wetlands delineation.
- A threat of pollution is posed to Swede Creek because there is no drainage plan for the the haul road.
- There are serious issues of groundwater contamination that have not been addressed.
- The effect of hauling noise on the community has not been adequately studied and should be the subject of a full EIS.
- Air pollution from the project has not been evaluated and there is no mitigation plan.

I have listed just a few of the problems. And listing them one by one does not begin to demonstrate the total impact of the project when these and other issues are all visited at once upon a rural neighborhood of our county.

I simply do not understand--and definitely do not support--your Mitigated Determination of Non-Significance. To me it seems to be just another instance of county government allowing big businesses to inflict irreparable damage on a rural Skagit neighborhood.

Please, let's have a thorough examination of this mining project through the full SEPA process.

Sincerely,



Mary Kay Barbieri

16002 Colony Road, Bow, WA 98232

22 April, 2021

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

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Sincerely,

Mary Kay Barbieri

16002 Colony Road, Bow, WA 98232

Robert N. Doupé
657 Muckleshoot Circle
LAConner, WA 98257

April 24, 2021

Skagit County
Planning and Environmental Services
1800 Continental Place
Mount Vernon, WA 98273

RE: PL# 0097 & PL#0098 PROPOSED MILES SAND AND GRAVEL CO.
MINING PIT

Dear People ,

I all writing in opposition to the current application of the above company's request to mine in the Skagit River watershed. There is a huge potential environmental impact as a result of their proposal. A declaration of non-significance makes a mockery of the law and the judgement of rational people. A thorough study of the impact of such an endeavor is the ONLY reasonable response to such an operation, A complete EIS would allow the County to rationally assess the impact of this project on the environment.

One cannot ignore the possible negative effect of this project on the surrounding community as it pertains to traffic, noise, effect on the habitat of the wildlife, the potential risk of runoff into the water supply of our county, not to mention the visible destruction of the property.

Please require a complete environmental Impact study by professional groups before making a decision that affects our county so profoundly.

Sincerely,



Robert N. Doupé

26 April 2021

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

Re: Concrete Nor'west/Miles Sand & Gravel; PL16-0097 & PL16-0098, Notice of Withdrawn and Re-Issued Mitigated Determination of Non-Significance (MDNS)

Dear Mr. Cerbone,

I am attaching a letter from Doug Gresham PWS of the Washington State Department of Ecology written in June of 2016 to John Cooper. He states that if any regulated waters of the State or Federal government or their buffers are affected by the above referenced project, permits from both jurisdictions will be required. As I referenced in a letter to you sent via email, and included in this packaged, is to complete a full wetlands, Streams, and habitat analysis of the entire parcel and haul road. The Skagit County Critical Areas ordinance requires the same. Once this site assessment is completed with the proposed conditions of the project, will the county be enabled to determine if impacts to said critical areas will occur.

I trust you will place these items in the requirements within your staff report.

Sincerely,

A handwritten signature in black ink, appearing to be 'JW', written in a cursive style.

Jim Wiggins, MS, PWS emeritus, past president of ATSI
21993 Grip Road
Sedro-Woolley, WA 98284

Re: Concrete Nor'west (CNW) application mining special use permit, PL 16-0097.

Fish and Wildlife, and Water Quality (regulated Critical Areas [CA]) review, comments and questions. Wiggins, November 2020.

The information provided to date by CNW for the above referenced project regarding biological issues is insufficient to determine impacts the proposed project will have on regulated critical areas. At a minimum, we need to have maps, surveys, and descriptions of all regulated critical areas (species and habitats) including those in and near the proposed mine site, and, all roads, specifically the proposed haul road. In addition, we need to know all permit conditions that will be proposed to mitigate for impacts identified in this larger footprint. Only then can we assess impacts and adequately comment on how the proposed mine and other related project details will have on the biological environment.

SCC 14.24.060 Authorizations Required, of the county Critical Areas Ordinance, states: With the exception of activities identified as Allowed without Standard Review under SCC 14.24.107, any land use activity that can impair the functions and values of critical areas or their buffers including suspect or known geologically hazardous areas, through a development activity or by disturbance of the soil or water, and/or by removal of, or damage to existing vegetation shall require critical areas review and written authorization pursuant to this Chapter.

The July 2015 Graham Bunting Associates (GBA) Fish and Wildlife Habitat Site Assessment report does not include descriptions nor data of the 63-acre mine site, wetland/stream buffers, wooded slope, nor the access road. It focuses only on the Samish River and adjacent wetlands with no data sheets to corroborate their findings. Because CNW has not submitted an updated critical area report for the entire impact area (proposed mine site, private road, and adjacent public roads) it is not known what type of impacts to County Critical Areas, species and habitats, and their buffers will occur. Furthermore, Critical Areas Reports require to be updated every 5 years. Said GBA report is over 5 years old.

The critical areas report completed by GBA for the wetlands associated with the Samish River recommends a 200' buffer. SCC 14.24.230 Wetland Protection Standards, requires a 300' buffer for High Intensity Land use, which the proposed mine is per the definitions section of the SCC CAO as follows: Land Use Intensity, High; Land uses which are associated with high levels of human disturbance or substantial habitat impacts including, but not limited to, medium-and high-density residential (more than one home per five acres), multifamily residential, some agricultural practices, and commercial and industrial land uses. Therefore, the Samish River and its associated wetlands require a 300-foot buffer. It is inherent in the proposed use of the site as a commercial gravel mine, there will be a significant increase in noise, dust, and general overall on-site movement of heavy equipment. The assumed existing buffer between the proposed mine and the Samish River and its associated wetlands is a wooded slope, protecting, in this case, all flora and fauna, such as migratory salmonids, trout,

avian species, and large and medium fauna such a deer, elk, bear, cougar, coyote, and fox. Additionally, we are now aware Oregon Spotted Frog (*Rana pretiosa*) habitat occurs along the Samish River adjacent to the proposed mine site. Bull trout (*Salvelinus confluentus*) are also known to use the Samish River sometime during their lifecycle. A biological assessment is needed to address these species.

The Scope of a SCC critical areas study requires a full description of the proposed project and all biological features whether said features are regulated by the local, state, or federal government or not and is a combined quantitative (on the ground data collection) and qualitative (literature and map review) report. A description of all features such as flora and fauna, soils, topography (a survey of the top of slope), land use, a general description of the surrounding area needs to be included to provide us with an understanding of what the study area looks like and what features are present. Current and historical photographs help with this understanding of the study area. A broad-based literature review with the on-the-ground data collection of all potential areas that will be impacted needs to be studied and included in the contents of the report.

In the GBA assessment, the singular wetland rating they completed appears accurate. However, the land use intensity (moderate) they concluded does not conform to the land use intensity description put forth in Appendix 8C of WA DOE Publication No. 05-06-008 as required if using the alternative buffers in SCC 14.24.230(1)(b), Department of Ecology (Doug Gresham, DOE), the authors (DOE) of the said referenced publication. The land use intensity for a full-time gravel mining operation is high. A high habitat score (supplied by GBA wetland rating) requires a 300-foot wetland buffer per SCC 14.24.230, not 200 foot as proposed.

The review/assessment also neglected SCC 14.24.230(2), where in general, buffers are to extend 25 feet past the top of sloping areas that are 25% or greater. The site plan as indicated shows areas where this provision is applicable. Regardless of the aforementioned land use intensity issue, the buffer likely should still extend past the line indicated in areas unless there is a rational reason put forth not to, which does not appear to have been done specific to this project.

Going from an access only road that is used infrequently for forestry purposes to a gravel mine haul road that could have dozens of truck trips per day for many years will be an impact to the environment in numerous areas. This will be a distinct habitat break in what is presently one of the largest undeveloped tracts of land remaining in lowland Skagit County, home to deer, bear, cougar, and elk *as well as many avian and small mammal species, and amphibians (** while CNW's application does not mention these species, local knowledge confirms their presence*). Heavily trafficked corridors are well known to affect the habits of such species. The haul road also drains to a salmon stream that has turbidity problems, i.e. Swede Creek, and it is not practical that the increased road traffic and maintenance/improvements without stormwater control will further affect the onsite wetlands, streams and riparian areas.

No meaningful protective measures have been assessed to the buffers of the critical areas adjacent to the mine operations. While recording of a Protected Critical Area (PCA) site plan is standard and generally adequate for a single family home, a commercial operation with employees on heavy equipment, no oversight, and no vested interest in the observation of the buffers will not protect said buffers. If there is no survey or mapping, how will anyone know where the critical areas and their regulated buffers are? The buffers need to be demarcated in the field, a standard practice, and should be fenced as well.

Because a Critical Areas Review and Fish and Wildlife Assessment has not been completed on the entire project area, it is likely additional biological critical areas occur on and near the project area, such as wetlands and Swede Creek and they need to be identified and surveyed. Also, because the GBA report is over 5 years old, by code, a new study needs to be completed. Not to mention recently (summer 2019) much of the land owned by Miles has been logged and the haul road has been widened and resurfaced, thus because of these new modifications to the site, necessitates an updated report.

Additional questions:

- What mitigation is proposed for CA impacts?
- How will mine excavation be monitored to ensure the “bottom” of the mine will remain greater than 10 feet above the seasonal high water table?
- Will the project occur beyond the mine site and proposed access road? If so, will there be road maintenance, widening, ditch maintenance, Grip/Prairie Road intersection maintenance/reconstruction? If so, said areas need to be assessed for regulated critical areas and mitigated for buffer impacts, habitat impacts, and stormwater quality.
- Because the mine site will be converted from forestry to a gravel mine, all habitat for the cursory list of species listed in this letter will be obliterated. For species such as amphibians that require upland habitat for a portion of their lifecycle further necessitates, at a minimum, the need for a 300-foot buffer off the wetlands adjacent to the Samish River. Also, other wetlands near the proposed mine and haul road mapped in the FPA further necessitates the need to complete an updated wetland/habitat reconnaissance and delineation report for all land within 300 feet of the mine and haul road.
- What mitigating measures have been included in the report for the introduction of invasive plant species such as Butterfly bush (*Buddleja sp.*) and spotted knapweed (*Centaurea sp.*) both of which occur on their Bellville pit site.
- What species and species habitats, such as Oregon Spotted Frog, Bulltrout, or other listed species occur in the Samish River watershed? Their presence needs to be assessed by qualified biologists and mitigation strategies addressed.

A handwritten signature in black ink, appearing to be 'JW', with a large loop on the left and a smaller loop on the right.

Jim Wiggins, MS, PWS emeritus, past president of ATSI
21993 Grip Road
Sedro-Woolley, WA 98284



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000

June 1, 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 and PL16-0098**

Dear Mr. Cooper:

Thank you for sending information on the Grip Road Gravel Mine to the Washington State Department of Ecology (Ecology) for our review and comment. As the Ecology Wetland Specialist responsible for Skagit County, I wish to have the following comments entered into the record. The project submittal provided to us included a mitigated determination of nonsignificance, SEPA environmental checklist, and engineering drawings.

Concrete Nor'west has 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.

The gravel mine will cover 51 acres and be excavated to within 10 feet of the groundwater table. A 200' buffer of undisturbed vegetation will be provided between the Samish River and the gravel mine. A 50' setback will also be provided along the remaining perimeter of the gravel mine where no grading will occur. All storm water runoff generated within the gravel mine excavation should flow into the closed depression and be prevented from reaching the Samish River.

John Cooper
June 1, 2016
Page 2

According to the SEPA environmental checklist, a Fish and Wildlife Site Assessment was prepared by Graham-Bunting Associates. They stated that the toe of the slope adjacent to the Samish River was mapped using LIDAR data. The engineering drawings show the 200' setback from wetlands associated with the Samish River, which I assume occurs at the toe of slope. However, there weren't any maps showing associated wetlands or the ordinary high water mark (OHWM) of the Samish River.

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. To obtain state and federal authorization, the following items are required:

- A delineation of all wetlands on the property by a qualified wetland biologist, and survey of the delineated wetland boundaries;
- Flagging of the OHWM along the Samish River banks by a qualified biologist, and survey of the boundaries;
- A jurisdictional determination from the U.S. Army Corps of Engineers stating whether the delineated wetlands on the property are under federal jurisdiction;
- Ratings of all wetlands on this property using the current *Washington State Wetland Rating System for Western Washington*;
- A critical area report describing wetland conditions on the property, wetland data sheets, wetland rating forms, and photographs;
- A Joint Aquatic Resources Permit Application form for impacts to jurisdictional wetlands and the Samish River; and
- A mitigation plan for unavoidable wetland and buffer impacts following the standards in *Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance* (Ecology Publication #06-06-011a).

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

DG:awp