

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Tuesday, May 14, 2019 4:00:01 PM

Name : David R Adams

PermitProposal : PL19-0032 and PL19 -0033, 0046, 0046 BP 19-0070

Comments : Please accept my additional comments on the named proposal. Please keep me informed.

I wish to reiterate my former comments regarding this proposal to keep my comment record current.

I feel that this proposal for a 100 year permit is an unreasonable time frame to even begin to evaluate the project effects. At most a 10 year period should be considered.

I am also concerned with the proposed hours of operation, they are too long, and will have an adverse effect on the community residents and the traffic.

I see this proposal as an effort to shoehorn a major industrial project into a rural area and hope no one will complain. On the contrary, there are valuable resources at risk and a thorough EIS should be completed.

Thank you

From Host Address: 50.34.223.61

Date and time received: 5/14/2019 3:56:32 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Tuesday, May 14, 2019 4:00:01 PM

Name : David R Adams



PermitProposal : PL19-0032 and PL19 -0033, 0046, 0046 BP 19-0070

Comments : Correction to email address for this respondent, NOT a duplication of comments

Please accept my additional comments on the named proposal. Please keep me informed.

I wish to reiterate my former comments regarding this proposal to keep my comment record current.

I feel that this proposal for a 100 year permit is an unreasonable time frame to even begin to evaluate the project effects. At most a 10 year period should be considered.

I am also concerned with the proposed hours of operation, they are too long, and will have an adverse effect on the community residents and the traffic.

I see this proposal as an effort to shoehorn a major industrial project into a rural area and hope no one will complain. On the contrary, there are valuable resources at risk and a thorough EIS should be completed.

Thank you

From Host Address: 50.34.223.61

Date and time received: 5/14/2019 3:59:29 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 4:55:01 PM

Name : Alyssa Barton

PermitProposal : Kiewit Infrastructure Proposed Marblemount Quarry (PL19-0032, PL19-0033, PL19-0047, and BP19-0070)

Comments : Dear Skagit County Planning & Development Services:

Thank you for accepting public comments on the Kiewit Infrastructure Marblemount Quarry that is being proposed in the heart of critical areas, at the gateway to the North Cascades National Park, nearby wilderness lands, and on parcels that are not all fully zoned for mining.

I am concerned that Kiewit's application for permits is out of order and misleading. At this stage, Kiewit's application for a Mining Special Use Permit (BP19-0070) includes areas that are not currently zoned for mining (MRO). The applicant must have all areas within their application be designated MRO through the Skagit County Comprehensive Plan including for forest conversion and road construction. It is out of order to approve these permits even if they may not be MRO at this time; however, the intent is to extract rock in these areas in the future.

Please do not approve permits for this project before moving forward with a full Environmental Impact Statement (EIS). What will the impacts of mining and rock blasting be to nearby property owners, wildlife, waterways, and cultural resources for the Upper Skagit Tribe? What will the impacts be from 260 vehicle trips six days per week up to 100 years be on carbon and air emissions, water quality in the Skagit River for salmon and the cities that depend on it as a drinking water source, and transportation from Marblemount to Bellingham? How does this project mesh with the policy goals and priorities of Skagit County, and Washington state? All of these questions and more must be studied and the negative impacts mitigated before this project moves forward.

Thank you for considering my comment.

Sincerely,

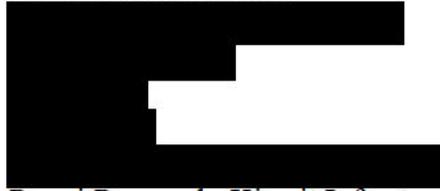
Alyssa Barton
Puget Soundkeeper Alliance

From Host Address: 67.139.99.118

Date and time received: 5/13/2019 4:51:16 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 9:00:01 PM

Name : Anne Honrath



PermitProposal : Kiewit Infrastructure Proposed Marblemount Quarry
Comments : Dear Skagit County Planning & Development Services,

Thank you for accepting public comments on the Kiewit Infrastructure Marblemount Quarry that is being proposed in the heart of critical areas, at the gateway to the North Cascades National Park, nearby wilderness lands, and on parcels that are not all fully zoned for mining.

I am concerned that Kiewit's application for permits is out of order and misleading. At this stage, Kiewit's application for a Mining Special Use Permit (BP19-0070) includes areas that are not currently zoned for mining (MRO). The applicant must have all areas within their application be designated MRO through the Skagit County Comprehensive Plan including for forest conversion and road construction. It is out of order to approve these permits even if they may not be MRO at this time; however, the intent is to extract rock in these areas in the future.

Please do not approve permits for this project before moving forward with a full Environmental Impact Statement (EIS). What will the impacts of mining and rock blasting be to nearby property owners, wildlife, and cultural resources for the Upper Skagit Tribe? What will the impacts be from 260 vehicle trips six days per week up to 100 years be on carbon and air emissions, water quality in the Skagit River for salmon and the cities that depend on it as a drinking water source, and transportation from Marblemount to Bellingham? All of these questions and more must be studied and their impacts mitigated before this project moves forward.

Thank you for considering my comment.

Sincerely,

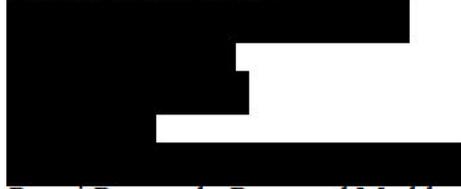
Annie Honrath

From Host Address: 97.113.18.202

Date and time received: 5/13/2019 8:55:11 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 4:45:01 PM

Name : Donna Keller



PermitProposal : Proposed Marblemount Quarry

Comments : I am writing to express my hope that Skagit County government will not approve the Marblemount Quarry Proposal by Kiewett.

My father, Robert Keller, purchased property on the Cascade River close to the Skagit River in 1974. I also teach Social Sciences at Skagit Valley College. The ethic of being responsible stewards of land and rivers and broader community of life is an eternal example to be very proud of.

Please consider: How will blasting the earth on this scale and then transporting across the state lead to a variety of costly and undesirable social and environmental impacts - such as diminished sense of the unique natural environment, increased potential accidents from increased truck traffic, and increased greenhouse gasses? Does the County want to be known for this, or for being the gateway to the Cascades? Is the County prepared to pay for unforeseen damages? Can Kiewett find a location to destroy closer to the areas that need the rock?

I appreciate the opportunity to share concerns!

Donna Keller

From Host Address: 73.53.10.220

Date and time received: 5/13/2019 4:40:12 PM

July 3, 2019

SENT VIA EMAIL AND REGULAR MAIL

Julie Nicoll [REDACTED]
Deputy Prosecuting Attorney
Skagit County, Civil Division- Planning & Development Services
Administration Building
700 S. 2nd St., Rm 202
Mt. Vernon, WA 98273

Planning and Development Services (pds@co.skagit.wa.us)
Attn: Hal Hart (hhart@co.skagit.wa.us),
Betsy Stevenson (betsyds@co.skagit.wa.us), and
John Cooper (johnc@co.skagit.wa.us)
1800 Continental Place
Mount Vernon, WA 98273

Re: Kiewit Infrastructure Co. ("Kiewit") Proposed Gravel Mine-Marblemount, WA; PL19-0033, PL19-0047, BP19-00070 & PL 19-0032

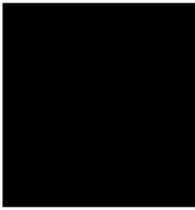
Our Client: Kiewit Infrastructure Co. ("Kiewit")

Dear Ms. Nicoll, Mr. Hart, Ms. Stevenson and Mr. Cooper:

This letter is written as a follow up to a recent meeting on June 11, 2019 at Skagit County offices between officials with Kiewit and Skagit County staff regarding the State Environmental Policy Act (SEPA) environmental review process related to the above-referenced Project. This letter is to be included in the public comments regarding the above application.

Kiewit's proposal was prepared and submitted with the intent and purpose to be transparent, and to fully disclose all aspects of its proposed operations. We think Kiewit fulfilled this intent, which is consistent with the requirements of SEPA, RCW 43.21C. Kiewit, with full disclosure and full transparency, provided a SEPA checklist that addressed full build out of the approximately 120-acre quarry consistent with the requirements of SEPA.

Kiewit prepared volumes of technical studies related to the project and included those with the application and formed an expanded SEPA checklist. Kiewit prepared these studies in advance of the application to incorporate those necessary mitigation measures into the Project design and operation plans. Kiewit's expanded SEPA checklist provided a full and thorough discussion of potential significant environmental impacts that may result from the proposed actions. The public and decision makers have been provided with adequate information to evaluate the



proposed actions, understand the project's purpose, and identify alternatives that could avoid or minimize adverse impacts or enhance the human environment. These studies included with the SEPA checklist were available for public comment prior to any SEPA review. The application including the expanded SEPA checklist, has undergone an extensive public comment period, which technically remains open today for comment.

The application and expanded SEPA checklist have received considerable public comments.¹ From our review of the comments after the extended public comment period, there have been NO substantive technical comments disputing any technical analysis of the studies included with the application. Nearly all of the comments that addressed a technical substantive area that would be part of SEPA review, addressed an area already studied as part of the application materials.

To date, after the end of the notice of application comment period over a month ago, Skagit County has not indicated any additional technical studies were necessary. County officials did raise questions regarding some comments related to three areas. Those areas, and initial responses are (1) concerns related to naturally occurring asbestos in local geology as occurs in the Beaver Lake Quarry and the Martin-Marietta Quarry² in or near Mt. Vernon- this condition can be mitigated through best management practices which will be included in Kiewit operation plans if demonstrated to exist; (2) comments related to additional birds and wildlife that should be addressed- this data is being collected and a supplemental report will be prepared; and (3) questions whether tribal consultation has occurred- this has occurred and Kiewit has consultation letters, which have been forwarded to County staff. At the meeting on June 11, 2019, no other comments were identified to be addressed by Kiewit and Kiewit officials indicated that if the County believed any additional studies were necessary, it would prepare those studies immediately and in advance of a SEPA threshold determination and would include those necessary mitigation measures, which may include changes to the Project design. As stated then, the purpose, from Kiewit's perspective, would be to utilize the commonly applied SEPA tools to assure transparency in advance, provide for the issuance of a Mitigated Determination of Significance (MDNS) that would be available for yet further public comment, and assure a timely and efficient SEPA process given the early technical analysis that is encouraged by SEPA and the County Code.³

Based on the comments received, *are there technical areas that the County believes warrant additional examination?*

If so, we would like to discuss those areas immediately, determine an agreed-upon scope of analysis, and then Kiewit will immediately commence preparation of those studies, which will include potential mitigating measures to reduce the Project's potential impacts below the level of significance.

¹ Much of that public comment was either repetitive by design to falsely appear voluminous, factually and/or legally in error. By way of example, and not limitation, the comments falsely assert that it is a "640-acre mine site". The proposed 100-year quarry will be a much small portion of this acreage as it will occupy only 119.6 acres.

² This is a colloquial name and may not be the proper name for this quarry.

³ WAC 197-11-055.

This iterative process with the application is consistent with, and required by, the SEPA Rules which have been adopted by Skagit County.

The SEPA Rules specifically allow an applicant to seek early notice of the consideration of a Determination of Significance (DS), to be advised of the issues that would be the basis of that DS, and then be allowed to conduct the studies that would support clarification and/or changes to the application that led the agency to consider a DS may be likely.⁴ See WAC 197-11-350(2).

After Kiewit is able to respond to those technical issues identified by the County SEPA Official, Kiewit asks now, in advance, that the County then identify those potential mitigating measures that would allow an MDNS to be issued. WAC 197-11-350(3) would require the County to issue an MDNS with those mitigating measures.

Kiewit is concerned regarding the potential politicization of the SEPA process in this case, which must be avoided. Any politicization of the SEPA process would be clear error. Any SEPA threshold determination of significance resulting from or based in part on a politicized SEPA process would be an arbitrary and capricious action and clearly erroneous. The politicization of the SEPA process would include any commitment by any county official that an EIS would be required. Even the appearance of a biased or politicized SEPA process can be fatal in that a SEPA official is a decision maker who must be free in all respects from political pressure and/or bias. Otherwise the County's process would violate the requirements of due process, and SEPA.

In closing, Kiewit conducted substantial studies that led to incorporation of mitigation measures into its Project plans. These efforts of pre-application analysis are exactly what a regulator should seek an applicant to do so that mitigation is built into project design and operation plans, rather than defer these design/operational considerations until late in the process. An MDNS is the appropriate action based on the project design, studies provided, the mitigation measures incorporated into the project application, and the comments received. Nevertheless, Kiewit is prepared to conduct additional studies if truly necessary.

Kiewit's proposal will generate roughly \$25 million dollars in direct local wages and service and related contracts within Skagit County, in addition to significant tax revenue to local governments and Skagit County. This is not inconsequential, but also consistent with other meaningful economic investments in other industries. Skagit County should not take the unprecedented step to require an EIS on a basic natural resource industry⁵ proposal after the extensive early technical studies were prepared to design an environmentally sensitive proposal.

Finally, an EIS's basic purposes are public disclosure and to provide a decision maker with technical information regarding a project and its potential adverse impact and mitigation measures. An EIS would provide no additional substantive technical information that Kiewit has

⁴ Pursuant to WAC 197-11-355, the County may require Kiewit to submit more information on the subjects in the County's SEPA checklist form.

⁵ Skagit County's rich history, particularly in the Marblemount area, has long been dependent on the natural resource industry.

not already provided or will provide if additional technical areas warrant study that the County can now identify. An EIS will not provide any meaningful additional Project public disclosure that has not already occurred as a result of the expanded comment period, particularly due to the additional public comment opportunities that would be associated with a SEPA Mitigated DNS and the Special Use Permit public hearing.

Kiewit looks forward to engaging in substantive discussions with Skagit County staff on the nature and scope of additional technical studies sought by Skagit County's SEPA Responsible Official so that Kiewit may have the opportunity to incorporate those reasonably necessary mitigation measures that would facilitate a Mitigated DNS as allowed, and required, by SEPA.

Thank you for your attention to this matter.

Sincerely,

CHMELIK SITKIN & DAVIS P.S.



Jonathan K. Sitkin

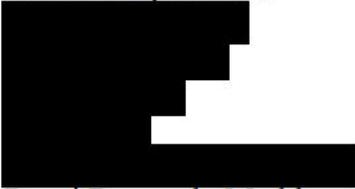


From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Monday, June 3, 2019 12:49:30 PM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Saturday, June 1, 2019 9:25 AM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Chip Marvin



PermitProposal : Marblemount quarry project/Kiewit

Comments : Having lived in Marblemount for 20 years I can attest to the uniqueness of said community. It is a nice, quiet place to live. We have since moved to Oregon upon retirement, but that hasn't ever changed the way I loved my property.

I read the list of reasons brought on by the public as to why this project should never happen, and they are numerous. That said, there is one item that you, your staff, nor anyone else can change except, perhaps God, and that is the noise that will be generated. Many of the reasons cited could have possible 'work-arounds.' Nothing can be done about the noise. 100 years of noise.

I am almost sure in my thinking that if I decided to set up a cement batch plant next to your house, and asked for a 100 year use permit, you'd not issue it.

You folks at the planning department represent the taxpayers of Skagit County and you should be looking out for the good of the people and what's good for the county. If I still lived there I'd be asking you this question: Is Skagit County prepared to eliminate 90% of the property taxes in and around Marblemount?

If residents wanted to sell their houses, that mining project would be the elephant in the living room. No one will be able to ignore it. No sane person is going to consciously buy a house in a war zone. For that matter, it would be a waste of time for anyone to try and sell their house and realize any kind of profit. In other words, that mining project could pretty much render their investments worthless. A Death Knell.

Unless Kiewit has some ultra-secret, never been tried before method of deadening the sound of an explosion, not to mention the detonation wave, I suggest the planning department puts their 'X' in the 'No' box and refuse to issue any permits whatsoever, leave that mountain alone, and move on to a different subject that is in more need of the County Planners attention.

Marblemount does not deserve this punishment for the sake of a few rocks bound for a jetty when Dolosse would be just a good if not better.

'Vote' against this act of environmental cruelty and 'vote' for another 100 years of peace and solitude.

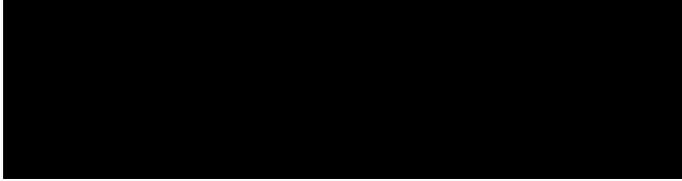
If the planning department fails to hear the sound of the people, the sound that'll be heard thereafter will be more than the sound of an explosion.

From Host Address: 50.38.103.168

Date and time received: 6/1/2019 9:21:28 AM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 4:55:01 PM

Name : JOHN MOWER



PermitProposal : PL19-0033 Kiewet Infrastructure Quarry

Comments : As a tax paying citizen of Skagit county, I would like to express my concerns and opposition to the proposed Kiewet Infrastructure Quarry. It will extract up to 9.6 million cubic yards of rock over its lifespan, generate 260 truck trips per day using our roads, and cause grief to the local people for no good reason. The taxes collected on rocks hauled away will not be paid to Skagit County, instead wherever the rock is delivered. The fuel will not be purchased locally. It is a terrible burden to place on Skagit County residents for naught.

Sincerely,
John R. Mower
Skagit County Dairy Farmer

From Host Address: 50.34.163.124

Date and time received: 5/13/2019 4:50:45 PM

From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Thursday, May 16, 2019 11:50:49 AM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Wednesday, May 15, 2019 4:05 PM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Gene Myers



PermitProposal : Kiewit Infrastructure Quarry operation near Marblemount, Permit PL19-0033

Comments : I would like to register my strong opposition to the proposed Marblemount Rock quarry. I help steward land within ¾ mile. I have also taken college students onto the upper parts of this area which were affected by the 1997 Jordan Creek fire, with permission from Crown Pacific / Olympic-Pope Res / Sierra Pacific owners. I am a frequent visitor to the Marblemount vicinity and know many people in the area.

This project will have many negative impacts:

- noise impacts on residents and wildlife
- impacts on waterways from some level of unmitigatable run-off of rocks containing levels of metals and other substances toxic to fish and aquatic life
- degradation of the area surrounding a wild and scenic river.
- salmon recovery, including Chinook salmon. Salmon biologists recommend that that best way to protect salmon is to protect entire intact watersheds rather than allowing degradation. Small restoration projects on smaller streams cannot have the positive impacts of preventing degradation.
- air pollution from dust
- traffic safety impacts from large trucks hauling on Hwy 20 which is not designed for such use.
- impacts on tourism from traffic hazards, making area lodgings less attractive, despoiling the view as one enters the area which is visually a gateway to the North Cascades.

The scope of this project is sufficient to spark through environmental reviews, and if not,

lawsuits are sure to follow. A thorough study would reveal the existence of alternative rock sources closer to their intended uses, and further from areas of relatively untouched landscapes.

Rock removal is not a sustainable use for this land. It might provide a few jobs but will inevitably be a bust, and leave the area less attractive to other economic uses.

Please do not permit this quarry!

Thank you for your consideration.

From Host Address: 140.160.116.84

Date and time received: 5/15/2019 4:04:58 PM

RECEIVED

MAY 20 2019

SKAGIT COUNTY
PDS



May 10, 2019

To Whom It May Concern

I am reading the report on the expansion of quarry mining and wondering about the impact on homes, businesses, farming and fishing. I own Glacier Peak Resort and Winery on State Route 20, Rockport, WA. We are mile marker 103 to 104. We are dependent on the traveling visitors visiting the Federal National Park and State Park, as well as the people coming to fish at the Skagit River. It is known as one of the best fishing, hiking and biking areas in the United States. What impact will 260 very large truck trips as well as mine blasting going on six days a week have on a narrow, windy road?

The mine blasting is to go on six day a week from 6 a.m. to 6 p.m. How far will the sound and vibration travel? Will the soot from the trucks damage crops and affect animals?

Has a study been done on how it will impact the lives and business in the area?

A decision may have to be made. Do we want this to be a mining valley or one of the finest tourist areas in the United States?



Gary Outzen

President

Glacier Peak Resort and Winery



From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Thursday, June 27, 2019 2:40:01 PM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Thursday, June 27, 2019 11:20 AM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Kari Nelson Paustian



PermitProposal : Marblemount Quarry

Comments : I'm writing Skagit County in reference to the proposed Marblemount Quarry that's moving through the permitting process this spring. I live and work in the North Cascades, and regularly recreate and drive the Rockport-Cascade road. This small, back country 2-lane with sharp corners and windy curves is not engineered to safely support the kind of frequent truck traffic and heavy loads that this quarry would create, and would provide significant risks to the dozens of residents and hundreds of tourists that use it daily during the summer.

Furthermore, the dust from huge tailing piles and potential for sediment runoff into local waterways, as well as the probability of groundwater contamination by chemicals used in blasting warrants an EIS.

Asking for Kiewit Infrastructure to provide detailed environmental impact information, and clear, scalable ways that they might mitigate those impacts is the least Skagit County should be doing. By asking for a full Environmental Impact Assessment, both the county and residents and visitors that would be affected by the project would get a clear view of what the impacts of the final expanded quarry site would be.

There is significant local push back against this project and moving forward, the county should heed those voices and think of this area not as just a future quarry, but also as a space that people care about and call home.

Thank you for your time,
Kari Paustian

From Host Address: 50.197.76.62

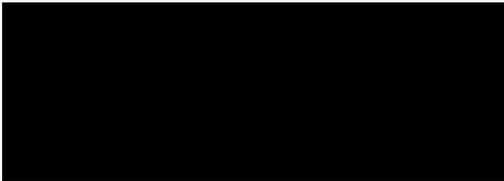
Date and time received: 6/27/2019 11:15:10 AM

From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Tuesday, May 14, 2019 8:05:35 AM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Tuesday, May 14, 2019 8:05 AM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Kevin Piasecki



PermitProposal : Marblemount Quarry- Kietwit Infrastructure Quarry Operation

Comments : I would like to oppose this project (cannot find a specific project number) without further analysis and a thorough EIS. The current project estimates up to 260 daily truck trips, 6 days a week, 12 hours a day for a HUNDRED years. The majority of trucks will need to enter hwy 20W from 530, which is a dangerous intersection. TSI's traffic impact analysis totally downplays this issue, simply stating that it is a less-than desirable sight distance which is mitigated by signage (assuming vehicles actually obey the speed limit signs which almost never happens on E-W Hwy 20 where most of the trucks will be entering. Further, the TSI report states that no adverse impacts to existing roadways will occur. Seems like running almost 1600 truck trips per week will destroy the old existing roadways, not to mention the peace and tranquility of this region (including Steelhead Park). Additionally, the increased high volume of truck traffic will impact the flow of normal vehicles and tourism to and through this region. Hwy 20 is the main E-W highway when open and clogging this vital artery with truck traffic will almost certainly impact the ability of the public to travel to and through Marblemount ("Gateway to America's Alps").

From Host Address: 174.21.1.238

Date and time received: 5/14/2019 8:00:07 AM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 7:35:01 PM

Name : Jake Sarrantonio



PermitProposal : Marblemount Quarry

Comments : Please require an Environmental Impact Statement for this project and take a hard look at road impacts, especially the intersection of Highway 530 and Highway 20.

From Host Address: 104.235.184.140

Date and time received: 5/13/2019 7:34:06 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 7:35:01 PM

Name : Sharon Sarrantonio



PermitProposal : Marblemount Quarry

Comments : Please require an Environmental Impact Statement for this project and take a hard look at road impacts, especially the intersection of Highway 530 and Highway 20.

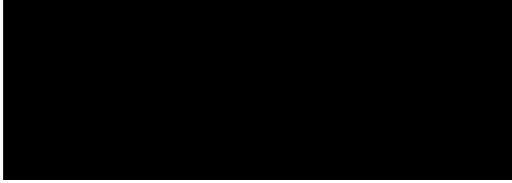
Thank you

From Host Address: 104.235.184.140

Date and time received: 5/13/2019 7:33:20 PM

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 7:15:01 PM

Name : Joe Shugart



PermitProposal : Proposed Marblemount Quarry

Comments : The establishment of this quarry should not be undertaken until a full EIS under the Washington Department of Fish and Wildlife has taken place. The proposed site has a high potential to hold significance to the local ecology of the region.

Additionally, I believe the concerns of the citizens of Rockport are valid - I don't see how, despite the official document's claims, their livelihoods wouldn't be interrupted by this ambitious project.

From Host Address: 73.140.182.245

Date and time received: 5/13/2019 7:13:12 PM

Skagit River Alliance

May 29, 2019

To

U.S. Senator Maria Cantwell
915 2nd Ave #3206
Seattle, WA 98174

From

Skagit River Alliance (SRA)
PO Box 2
Marblemount, WA 98267
[REDACTED]

RECEIVED

MAY 29 2019

SKAGIT COUNTY
PDS

Re: Proposed Devastating Mine along the Skagit River within Washington

Dear Senator Cantwell,

On behalf of Skagit River Alliance (SRA) members, thank you for expressing your opposition to the proposed Imperial Metals mine at the headwaters of the Skagit River in British Columbia. Our citizens' group was impressed that you recognized and took a stand on the devastating impacts that a mining operation of this magnitude could have along the entire watershed. Skagit River Alliance is a non-profit corporation created to represent the values, concerns, and overall sentiment of eastern or "upriver" Skagit County community members, particularly in and around Marblemount, Rockport, and Concrete. Our purpose is to educate and advocate for Skagit River communities and the watershed.

As residents who love the Skagit River Valley we also strongly oppose the Imperial Metal mine because of the devastating impacts it could have along the entire Skagit River. We are equally concerned about a proposal to mine asbestos-bearing rock in Skagit County, Marblemount, Washington. This large-scale quarry would also seriously threaten the tourism and recreation economy, natural and cultural resources and human health. We encourage you to review and track this separate but equally concerning mine, proposed by Kiewit Infrastructure Corporation to supply jetty stone for Columbia River jetty rehabilitation.

As we reviewed the detailed project proposal and permit documents for the Marblemount Quarry our concerns grew to a level of shock due to the magnitude of proposed activities and potential detrimental effects on health of humans, wildlife and fish, natural and cultural resources, tribal treaty rights, safety of roads and bridges, and our local economy for a 100-year permit period. Our economy relies on tourism, and recreation opportunities. We recognized that this type of operation is incompatible and would have immediate and long-lasting effects that could completely erase the good work of multiple state and national agencies, Washington Treaty Tribes, and nonprofits and partner groups who have expended a great deal of effort and funds to restore and rehabilitate salmon and wildlife habitat, track water and air quality, and encourage responsible recreation and economic solutions in this region of Washington. In the initial public comment period for the Skagit County Notice of Proposed Development Application, 724 comments were received by hundreds of individuals and groups. This is a high level of engagement for a quiet rural corner of Skagit County. As we write this letter, we are cautiously optimistic that Skagit County will require a detailed SEPA Environmental Impact Statement (EIS) to bring the issues and risks to light.

You have expressed the potential detrimental effects to state resources from copper and gold mining at the Skagit headwaters in your letter to Secretary of State Mike Pompeo. As quoted from your letter, “This proposed mine in the Skagit River headwaters could negatively impact Washington state’s tourism and recreation economy, the public health of citizens, and our state’s cultural and natural resources, including economically and ecologically valuable fish populations that are dependent upon the health of the transboundary watershed.” We appreciate your recognition that water pollution entering the Skagit River from the headwaters could harm the fisheries as far downstream as Puget Sound and threaten recreation on the Skagit River. The same types of concerns apply for the Marblemount Quarry proposal. Additional concerns, beyond the Imperial Metals mine situation, include impacts to residents living in the immediate area surrounding the proposed mine site and damage to county and state roads. These would be far beyond anything ever approved in the Upper Skagit Valley.

Industrial-scale rock mining is a highly disruptive operation, therefore local impacts and a cascade of additional problems from spreading contaminants through air, water, and transport are extremely important to consider to avoid undue damage to the ecosystem and health and livelihoods of citizens and communities.

As an example, mining in asbestos-bearing deposits in Libby, Montana has taken hundreds of lives of miners and the broader community and devastated the remaining population in that community. Natural geologic hazards in Everson, Washington puts citizens at continued risk of asbestos exposure. We encourage you to review these two superfund cleanups we believe are relevant. These examples have helped us to develop clear foresight of the serious health risks to our community if mining were permitted. Skagit County identifies naturally-occurring asbestos as a geologic hazard and the rock the project proponent wants to obtain contains actinolite (i.e., asbestos mineral). The Marblemount site has been identified as geologic-hazard critical due to steepness and instability. These combined risks make blasting and mining rock there an unreasonably unsafe endeavor.

Citizens of the small communities along the upper reach of the Skagit River take pride in the peaceful beauty, bounty, and diversity of fish and wildlife, clean air and clean water, and are committed to protecting them. Understanding the context of the proposed site--a peaceful forested landscape with people’s treasured homes in close proximity to the quarry site, situated at the gateway to national park and national forest lands and designated wilderness areas, is just as important as recognizing the potential for downstream effects. This section of scenic Skagit River hosts the largest migratory eagle population in the lower 48 states due to the diverse salmon population. Other threatened, endangered, listed and protected species would be directly impacted because they currently live in, forage, and nest in the proposed area for development. We are cautiously optimistic that a detailed Environmental Impact Statement (EIS) will accurately and thoroughly address all of these impacts so that an informed decision can be made.

Rock quarry mining may not immediately appear to have the same impacts and hazards as a metal mining operation. However, in our review of Kiewit’s plans there are multiple serious concerns:

- **Air quality**—blasting and earth-moving in asbestos-bearing deposits. While the proposed Marblemount Quarry would not carry the threat of copper contamination, actinolite (an asbestos mineral) in the Shuksan greenschist, would be released as particulate dust if

Kiewit Infrastructure Corporation is permitted to blast a 60-foot wide mining road up to the top of the mountain, blast 9.6 million cubic yards of material (removing Big Bear mountain), and move, stockpile, and transport rock onsite and offsite all along the Skagit County Rockport-Cascade Road and SR-20 corridor to Interstate 5 and beyond. Clearcut logging 90-acres to harvest 2.7 million board feet of timber could also have the potential to stir up dust. The EPA warns that any visible asbestos particulate is unsafe for human health. Dust is commonly reduced by spraying or misting with water.

- **Water quality**—asbestos and toxic substances associated with operations (e.g., diesel gasoline, ANFO (ammonium nitrate fuel oil) and other emulsions (not listed in permit documents), and large volumes of drilling lubricants) pose risks for spread of hazardous materials through spills, infiltration to groundwater, storm runoff, and transport as particulate or residue on the proposed 260 trucks per day to and from the jobsite. Waste rock left behind could be piled up to 200 feet high over a 28-acre area on site, leaving potential for leaching of toxic substances over time into the soil, groundwater and stormwater runoff. At some point in the future, some of this stockpile would be crushed into gravel, posing additional risk for asbestos spread. These scenarios put human health at risk, but would also pollute surface flows and the unconfined aquifer, putting the Skagit River and other fish-bearing streams at risk during a time when fish populations have been in decline due to other pressures. Contaminated wells at nearby residences that draw from the shared aquifer are also a serious concern.
- **Road safety**—the proposed activities would average one truck every three minutes on roads and bridges not built for the load weights and frequency along active school bus routes.
- **Residences and wildlife**—Residential property abuts the quarry and the nearest home is just 600 feet away and downslope. Potential for rolling rock accidents is of great concern to homeowners as is the rock dust and repeated and incessant noise disturbance outlined in the proposal. These pose immediate and long term impacts to the fish and wildlife, health of citizens and communities. Residents in thirty homes surrounding the proposed quarry site would feel, hear, see (and breathe) the most direct effects and infringement on personal property rights.
- **Local economy**—degradation of the tranquil rural atmosphere that the local tourism economy relies on. Livelihoods would be eliminated and the character of our community would be lost forever.

You pointed out in your letter to Secretary of State Mike Pompeo that, “Mining in the Upper Skagit River Watershed could be detrimental to the Endangered Species Act-threatened fish and other wildlife populations, such as salmon and orca. This watershed provides over 30 percent of the freshwater flowing into Puget Sound and supports a diverse fish and wildlife population that are of local, regional, and national importance, including the largest population of threatened steelhead and Chinook salmon in Puget Sound and the largest run of chum salmon in the contiguous United States.” Thank you for these wise words.

The upper stretch of the Skagit River, where the jetty rock quarry is proposed, hosts numerous Chinook nest sites (redds) in the river bed and spawning grounds for multiple salmon species. We are grateful that you already understand the implications of loss of habitat and water quality.

During the public comment period, concerned Skagit County citizens have also expressed the numerous ways the proposed quarry mining operation in Marblemount is in direct conflict to Skagit County’s 2016-2036 Comprehensive Plan. We believe Skagit County officials will faithfully adhere to

the Comprehensive Plan, which endeavors to “protect and conserve clean air and water, preserve natural, scenic, and cultural areas that generate civic pride, ensure responsibilities to the government for future generations, attain a wide range of land uses without degradation, risk to health or safety, or other undesirable or unintended consequences, and by recognizing that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the protection and enhancement of the environment by recognizing existing non-conforming land uses and the development rights associated with them.” We are citizens who would like to continue to live in balance with the ecosystem we share and continue to have civic pride in our County and our State. We ask for your support in expressing the importance of this balance.

We urge you to consider the broad impacts of this massive project on such a sensitive area. It seems that, for some unidentified reason, the Marblemount Quarry proposal is caught up in response to coastal zone management. Kiewit’s stated purpose in the permit application is to “supply jetty stone for several major projects on the west coast including the emergency repair on the Mouth of the Columbia River”. They further state that the site is “one of the very few sources of ready-to-permit jetty rock on the west coast” (Skagit County Special Use Permit Application, Detailed Project Description, paragraph 1.2). While it is not clear what Kiewit intends by use of the terms “emergency” or “ready-to-permit,” it is clear that the Marblemount Quarry site is not ready-to-permit, and it is not clear that any emergency has been declared by the Army Corps of Engineers (the Corps) for Columbia River jetty rehabilitation. We are, however, aware that Marblemount is nearly 300 miles from the intended jetty project. A significant number of sites with open active permits for procurement of the required jetty stone are in closer proximity to the identified Columbia River project. We are also aware that the Corps has been planning rehabilitation of the jetty system at the mouth of the Columbia River (MCR) since at least 2006 and pursuant to the National Environmental Policy Act concluded an environmental assessment (EA) in 2012 (*Revised Final Environmental Assessment, Columbia River at the Mouth, Oregon and Washington, Rehabilitation of the Jetty System at the Mouth of the Columbia River*). In the EA, the Corps identified a quarry at Marblemount as one in 15 potential sources of jetty stone (Table 26, p. 126). However, they acknowledge, “it is not exactly known where jetty rock would come from...” they further state, “The Corps intends to use operating quarries rather than opening any new quarries.” (p. 123). The Kiewit Corporation proposes to expand upon a prior, very limited use, talus quarry (inactive since the 1980s). We are aware of many significant zoning and other permitting issues relative to the proposed Marblemount site that would need to be resolved. These equate a new quarry at Marblemount rather than an expansion of existing use. Despite the caveats, inclusion of the quarry in the EA has the appearance of pre-decision by the federal government and we have concerns that Kiewit is unduly using the Marblemount Quarry to compete for a lucrative contract with the Corps.

In the bigger picture, our concerns reach beyond this moment in time and beyond this project. As our county and state addresses the reality of climate change, rural communities may be under increased pressure for rock extraction. We understand that quarried rocks and gravel are resources that will be procured for shoreline protection but we urge you to consider the broader implications and long term effects to the environment and citizens from mining when searching for solutions.

We encourage you to contact the Skagit County Planning and Development office 1800 Continental Place, Mount Vernon, Washington 98273 or (360) 416-1400 to learn more about the project proposal, permit documents and comments for the Marblemount Quarry (Permit Numbers PL19-

0032, PL19-0033, PL19-0046, BP19-0070). SRA has also posted maps, photographs, and public comment letters submitted to Skagit County from individuals, tribes, agencies, and non-profit groups on our website skagitneighbors.com.

We think you will find from the submitted documents and public comments, as we have, that this project poses a threat to the future of this precious ecosystem as well as the communities and citizens who live within it. Rest assured, your voting public is paying attention to your commitment to protect the future of our state's resources and our citizens. We look forward to hearing your perspective on the proposed Marblemount quarry.

Sincerely,

Andrea L. Weiser
Skagit River Alliance Boardmember

Jose M. Vila
Skagit River Alliance President

Recipients:

U.S. Senator Maria Cantwell
U.S. Senator Patty Murray
U.S. Congresswoman Suzan DelBene
U.S. Congressman Rick Larson
U.S. Congressman Derek Kilmer
U.S. Congresswoman Pramila Jayapal
U.S. Congresswoman Kim Schrier
U.S. Congressman Adam Smith
U.S. Congressman Denny Heck

CC to:

Washington Governor Jay Inslee;
Council Chairwoman Jennifer Washington, Upper Skagit Indian Tribe;
Council Chairman Brian Cladoosby, Swinomish Indian Tribal Community;
Council Chairman Benjamin Joseph, Sauk-Suiattle Indian Tribe;
Mitchell Johnson, USACE, Contracting Officer;
David Boone, USACE, Contract Specialist for MCR Jetties;
Skagit County Commissioners Lisa Janicki, Ron Wesen and Ken Dahlstedt;
City of Seattle Mayor Jenny Durkan

From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Tuesday, May 14, 2019 11:05:01 AM

Name : HANNAH SULLIVAN



PermitProposal : Kiewit Marblemount Rock Quarry

Comments : I can't say it better than my neighbor and esteemed friend Andrea Wiesel wrote today. Please know that these are my feelings as well:

It is an honor to live near 2 of the 6 federally-designated Wild and Scenic Rivers in Washington State. The proposed type of development for large-scale jetty rock extraction and gravel extraction and processing in Marblemount, Washington is in direct opposition to the character of the federally-designated Wild and Scenic Skagit River and Illabot Creek. The significant special characteristics that these waterways possess, which gained them recognition on a national level, would be at risk from this type of industrial-level development. The Wild and Scenic Rivers Act (Public Law 90-542; 16 U.S.C. 1271 et seq.) is to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. Less than 3/10ths of 1% of Washington state's river miles are designated as wild and scenic. This project would pose potential risks to 2 out of the 6 total rivers in the state designated as wild and scenic.

From Host Address: 73.225.27.62

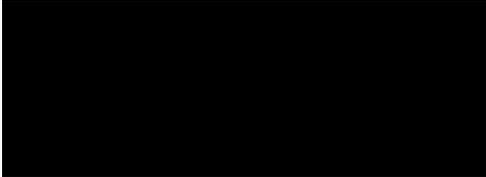
Date and time received: 5/14/2019 11:01:22 AM

From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Thursday, May 16, 2019 3:47:07 PM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Thursday, May 16, 2019 3:15 PM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Anya Voloshin



PermitProposal : PL19-0032, PL19-0033, PL19-0047, and BP19-0070
Comments : Dear Skagit County Planning & Development Services,

Please do not approve the application for the quarry. The skagit valley is such a special and beautiful place that faces enough threats without adding a destructive, potentially polluting, giant eyesore. There is a reason the skagit river is wild and scenic, why the mountains are a national park and the surrounding forest a national wilderness. We need this habitat to remain protected, to protect the last of what remains of our salmon runs and protect our tourism dollars.

Thank you for accepting public comments on the Kiewit Infrastructure Marblemount Quarry that is being proposed in the heart of critical areas, at the gateway to the North Cascades National Park, nearby wilderness lands, and on parcels that are not all fully zoned for mining.

I am concerned that Kiewit's application for permits is out of order and misleading. At this stage, Kiewit's application for a Mining Special Use Permit (BP19-0070) includes areas that are not currently zoned for mining (MRO). The applicant must have all areas within their application be designated MRO through the Skagit County Comprehensive Plan including for forest conversion and road construction. It is out of order to approve these permits even if they may not be MRO at this time; however, the intent is to extract rock in these areas in the future.

Please do not approve permits for this project before moving forward with a full Environmental Impact Statement (EIS). What will the impacts of mining and rock blasting be to nearby property owners, wildlife, and cultural resources for the Upper Skagit Tribe? What will the impacts be from 260 vehicle trips six days per week up to 100 years be on carbon and air emissions, water quality in the Skagit River for salmon and the cities that depend on it as a drinking water source, and transportation from Marblemount to Bellingham? All of these questions and more must be studied and their impacts mitigated before this project moves forward.

Thank you for considering my comment.

Anya Voloshin

From Host Address: 174.127.146.66

Date and time received: 5/16/2019 3:11:11 PM

From: [Lori Anderson](#) on behalf of [Planning & Development Services](#)
To: [John Cooper](#); [Christian Hardt](#)
Subject: FW: PDS Comments
Date: Tuesday, June 18, 2019 12:07:46 PM

From dept email

From: website@co.skagit.wa.us <website@co.skagit.wa.us>
Sent: Tuesday, June 18, 2019 11:50 AM
To: Planning & Development Services <planning@co.skagit.wa.us>
Subject: PDS Comments

Name : Dawn Vyvyan



PermitProposal : Kiewit Infrastructure Co.

Comments : Please send me notice of all activities on the permits and planning for this mining operation at or near Marblemount, WA. May also be known as the "Marblemount Quarry" and adjacent sites. Thank you.

From Host Address: 76.121.51.74

Date and time received: 6/18/2019 11:48:32 AM

Comments on PL19-0033, Marblemount Quarry



Full Name: Andrea Weiser
Mailing Address: PO BOX 231, Marblemount, WA 98267



Proposal Name or Permit Number: PL19-0033, Marblemount Quarry

RECEIVED

To: Skagit County Planning Office pdscomments@co.skagit.wa.us
Planning and Development Services
1800 Continental Place
Mount Vernon WA 98273

MAY 30 2019

SKAGIT COUNTY
PDS

Thank you for the opportunity to comment. I have reviewed the project proposal and supporting documents for expansion of the Kiewet infrastructure for rock quarrying and mining in Marblemount 59252 Rockport-Cascade Road, Skagit County, within a portion of Section 24, Township 35 North, Range 10 East, Skagit County, WA (Parcels P45543, P45541, P45548, P45552, P45550, P45548, P128574, & P120304). The associated permits are PL19-0032 and PL19-0033, PL19-0046, and BP 19-0070.

I am deeply concerned with this proposal because even without a fuller understanding of overall reach or longevity of impacts (i.e., through an EIS), this is clearly an inappropriate location for such dramatic direct and indirect impacts to the health of people, animals and fish, health of the natural environment, and the overall aesthetics and quality of life for all those who live in or travel to this project vicinity.

This proposal is in a location within close proximity to a wild and scenic river in one of the largest annual migration areas for bald eagles in the country in a river system where federal, state and tribal agencies, and non-profit groups work in coordination and have spent millions of dollars to enhance and protect and educate the public about salmon and wildlife habitats and environmental health. This project is located at the gateway to U.S. National Park and U.S. National Forest wild and wilderness areas where visitors from all over the world come to enjoy the scenery and recreation opportunities in a rural, remote, mountainous non-industrial setting. Several things about the proposed project are diametrically opposed to these values and would undermine the progress that has been made over the last several decades to promote recovery from resource exploitation and extraction and cooperation and collaboration between groups toward a common goal.

This quarry expansion project is counter to the mission of the Recreation and Conservation Office (RCO) which, is a small state agency that manages millions of dollars in grant programs each year to "create outdoor recreation opportunities, protect the best of the state's wildlife habitat and farmland, and help return salmon from near extinction(www.RCO.wa.gov)." The habitat and recreation opportunities in the Skagit River system is a key part of their programs. They collaborate with partners and tribal communities annually with a focus toward restoration. The project proposal and

Comments on PL19-0033, Marblemount Quarry

potential effects of the quarry project in this location is the direct opposite of RCO mission and the organizations it supports: i.e., Recreation and Conservation Funding Board (RCFB); Salmon Recovery Funding Board (SRFB); Invasive Species Council Governor's Salmon Recovery Office; Habitat and Recreation Lands Coordinating Group."

People visit and live in Marblemount because of the low population density, abundant fish and wildlife, clarity of the air and water and beauty of the landscape. Not only would the proposed project disturb the peaceful beauty of the landscape, it would leave a lasting visible scar on the geography and a series of invisible scars that may take decades to recognize or understand.

The studies that are submitted with the project proposal so far only serve to highlight the great gaps in understanding of the lasting and overall impacts of such a proposal. Yet comparison to other areas of and projects of similar scope and scale make it clear that the costs and risks to the surrounding community and environment would be far greater than the benefit.

Noise

Perhaps the most obvious immediate and lasting negative impact over the broadest reach would be sound. From my home in Marblemount, I can already hear a chainsaw from over a mile away and rocky ridges reflect that sound like a speaker to the rest of the community. It's difficult for me to fathom the noise and vibration impact of blasting for constructing over a mile-long stretch of road, chainsaw and heavy equipment noise for timber harvest of 2.7 million board feet over 90 acres and the truck traffic to transport all that timber. Removal of 3.8 cubic meters of quarry rock and transporting it could involve up to 250 truck trips per day, at three minute intervals, six days per week for 12-hour days. Add to this level of noise disturbance a rock crushing operation, oversized trucks carrying rock pieces large enough to use for jetties, and gas and diesel re-supply trucks large enough to fill and refill storage tanks for 13,000 gallons of diesel fuel and 1,500 gallons of gasoline. There is no way to adequately mitigate for this sustained level of sound and traffic for the people living directly downslope or across the road from these proposed operations such as the residential homes along Cascade River Road. And the noise would be projected by the rock faces being demolished and would carry across the valley, across the river and be heard by people specifically in Marblemount for the quiet camping and recreating experiences. Tourism is an important part of the economy and the National Park Service and Forest Service have built their programs to support it.

Environmental Health & Water Quality

Transport, storage, and resupply of diesel and gas leave the area at risk for spillage of toxic materials which can cause local soil contamination and far reaching contamination through water transport. The proposed work is on a rocky site in an area that receives an average rainfall of roughly 70-80 inches per year. This is a setup for slope runoff conditions compounded by the proposed timber harvest that would put fish-bearing streams and the Skagit River system at risk for contamination.

Comments on PL19-0033, Marblemount Quarry

Traffic

Traffic increases from the transportation of timber, rock, gravel, and diesel and gas would cause a huge negative impact to the surrounding community(ies) for traffic safety and road maintenance due to the heavy loads. Currently the Cascade River Road is a favored route for bicyclists, motorcyclists, runners and fishermen in addition to the local commuter traffic you might expect in a rural community. It is a quiet road with not much traffic and a narrow shoulder. This dramatic shift in usage would cause a safety hazard for anyone wanting to run or ride a bike and the large and oversized trucks used to transport extracted materials would cause bottleneck areas for motorists and increase hazards such as flying gravel or debris from truck wheels.

Environmental Considerations

Though the SEPA checklist and Biological Assessment touches on several of my other concerns, the scope of study so far has been either inadequate to address them or already made it clear to me that this proposed project is not suitable for the location it is proposed within.

Comprehensive Plan and State Constitution

The proposed activities to expand the rock quarry infrastructure and operation are in direct opposition to the Skagit County Comprehensive Plan. Relevant sections regarding property rights include, and I quote:

Skagit County, in exercising its land use regulatory authority to protect the public health, safety and general welfare (Article XI Section 11 of the State Constitution), must respect private property rights by not exceeding the constitutional limits on its authority. Planning, land use regulations and zoning protect individual and community rights in the following ways:

- *by avoiding nuisances through ensuring against incompatible neighboring land uses;*
- *by balancing public and private responsibilities that may have conflicting interests;*
- *by providing predictability that enhances the value of private property;*
- *by protecting and conserving the natural resources that provide us with clean air and water;*
- *by protecting our heritage by preserving both natural and man-made resources, and scenic and cultural areas that generate civic pride;*
- *by assuring that each generation has responsibilities as a trustee of the environment for future generations;*
- *by attaining the widest range of land uses without degradation, risk to health or safety, or other undesirable and unintended consequences; and*
- *by recognizing that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the protection and enhancement of the environment;*
- *by recognizing existing non-conforming land uses and the development rights associated with them.*

Comments on PL19-0033, Marblemount Quarry

Cultural Resources

A more expansive and intensive study is needed to establish how many cultural resources lie within the project footprint and how those and other known cultural resources outside of the footprint would be affected by the proposed activities. Due diligence for search/discovery of cultural resources has not been met nor is it adequate to address long-term indirect effects of the project. The project came to my attention because I'm a local resident of Marblemount and would feel, hear, and see the dramatic effects of such a project. I also have particular expertise relevant to reviewing the cultural resources investigation for the project as a professional archaeologist recognized by the Department of Archaeology and Historic Preservation (DAHP) and the Secretary of Interior for my professional qualifications, which include a Masters degree in archaeology and over 25 years of experience, most of that in the surrounding area in Washington. I have reviewed dozens of such reports in Washington in recent years across several counties and conducted many archaeological investigations myself so I am well aware of the guidelines set forth by the DAHP as well as best management practices and common styles of investigation that are conducted in the region. For an area of medium to high probability for archaeological discovery such as this, a low level interval of investigation would be 5 shovel tests per acre which would equate to 600 shovel probes for this 150-acre project. Archaeological survey is typically tailored to the topography and conditions in a project area and the research design should show an appropriate coverage of the area to meet due diligence. In an area like this that includes a lot of rocky terrain, the number of shovel probes would be reduced but the amount of pedestrian survey transects would be increased due to the potential for rock art, rock shelters, toolstone outcrops, cairns and other features that may be related to hunting, ceremony or other activities.

Another consideration is that level of effort should match the scope of proposed disturbance of a project. The Cultural Resources Report submitted for this project is grossly inadequate to meet the scope of the proposed project. A survey conducted in two partial days by three people and only 9 shovel tests to cover a 150-acre project area, much of which would be demolished by rock extraction and road building if the project moves forward, is an inappropriately small level of investigation. I question why the archaeologists did not continue their survey to cover a greater area or find additional areas within the 150 acres for more intensive investigation. It is not clear from their report how much of the area they actually surveyed. Since the scope of the project is to remove most of the rock within the project footprint, the scope of impact is much greater than the scope an archaeological survey could achieve in two days of work.

Further, the authors mention nearby archaeological sites as general context but fail to make a connection between the area of the proposed project and nearby cultural resources deeply important to the Sauk-Suiattle, Swinomish, and Upper Skagit Tribes. Distance in mileage is not the best measure of the connectivity of a landscape and river system to cultural importance in the precontact period. Nearby villages contain archaeological evidence showing thousands of years of use, and human remains in other nearby locations represent two types of cultural resources that are important to consider and serve to heighten the probability of finding archaeological sites in the

Comments on PL19-0033, Marblemount Quarry

surrounding terrain. Broad "home base" areas that indigenous people accessed for different activities surrounded villages (perhaps several miles accessible on foot and even greater distances easily accessible by canoe). Ethnographic documents suggest a high probability for spiritual/ceremonial practices in places like highpoint rock promontories close to villages such as the proposed project area. Other precontact (prehistoric) types of activities that could be expected within the project include hunting, camping, plant collecting, acquiring stone suitable for making tools and for special ceremonies. Rock shelters, culturally-modified trees and significant trails are also possible within the project footprint. Ridge tops and ridge saddles are some of the highest probability landforms for finding archaeological sites as is demonstrated by hundreds of archaeological sites recorded and studied throughout the North Cascades. This project includes a ridge crest with close proximity and access to the Skagit River, and nearby villages could have easily been accessed by trail and then a short canoe ride.

These cultural areas are important to the tribes as evidence of their history and some for modern-day visitation to these places. It appears that the authors of the cultural resources survey did review archaeological and ethnographic expectations, but didn't design their strategy of investigation to adequately search for them.

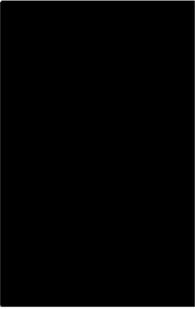
Again, I appreciate the opportunity to comment and thank you for considering the many additional ways that this proposal threatens quality of life and health of the community and environment now and in the very distant future.

Sincerely,



Andrea L. Weiser

Andrea Weiser, M.A.
Earth Logic,
Archaeological Consulting



SEATTLE
WA 98101
28 MAY '98
PM 5 L

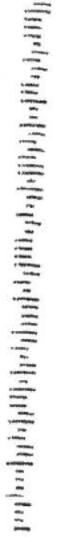
Ken Dahlstedt
1800 Continental Pl., Ste 100
Mount Vernon, WA 98273

\$0.50
US POSTAGE
FIRST-CLASS
062S0009600713
98273



983110 15

98273-562500



From: [website](#)
To: [Planning & Development Services](#)
Subject: PDS Comments
Date: Monday, May 13, 2019 10:50:01 PM

Name : Gary Wickman

PermitProposal : Kiewit Infrastructure Proposed Marblemount Quarry
Comments : Dear Skagit County Planning & Development Services,

Thank you for accepting public comments on the Kiewit Infrastructure Marblemount Quarry that is being proposed in the heart of critical areas, at the gateway to the North Cascades National Park, nearby wilderness lands, and on parcels that are not all fully zoned for mining.

I am concerned that Kiewit's application for permits is out of order and misleading. At this stage, Kiewit's application for a Mining Special Use Permit (BP19-0070) includes areas that are not currently zoned for mining (MRO). The applicant must have all areas within their application be designated MRO through the Skagit County Comprehensive Plan including for forest conversion and road construction. It is out of order to approve these permits even if they may not be MRO at this time; however, the intent is to extract rock in these areas in the future.

Please do not approve permits for this project before moving forward with a full Environmental Impact Statement (EIS). What will the impacts of mining and rock blasting be to nearby property owners, wildlife, and cultural resources for the Upper Skagit Tribe? What will the impacts be from 260 vehicle trips six days per week up to 100 years be on carbon and air emissions, water quality in the Skagit River for salmon and the cities that depend on it as a drinking water source, and transportation from Marblemount to Bellingham? All of these questions and more must be studied and their impacts mitigated before this project moves forward.

Thank you for considering my comment.

Sincerely,
Gary Wickman

From Host Address: 50.34.172.179

Date and time received: 5/13/2019 10:48:19 PM