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March 27, 2017

Raging River Quarry ATTN: John Priebe 3123 NE Harrison Street Issaquah, WA 98027

RE: Early Notice of Likely Determination of Significance

Raging River Quarry Expansion GRDE15-0166

Dear Mr. Priebe:

Pursuant to WAC 197-11-600(4) this letter is to inform you that after review of the environmental checklist and other documents submitted as part of the project review the Department of Permitting and Environmental Review (DPER) has determined that the proposal is likely to result in potential significant adverse impacts to certain elements of the environment. The project that was evaluated in prior environmental impact statements (EIS) is considerably different than the current operations so many of the impacts previously analyzed, and mitigation measures proposed, would not be relevant, or adequate, for the proposed operation. The noise analyses and recommended noise mitigation measures were focused on the properties located to the east of the mine entrance with little or no analyses of noise impacts to properties and land uses located to the west of the proposed expansion area. The prior environmental reviews did not consider the impacts on species listed as threatened or endangered since these environmental reviews were completed.

For these and other reasons, DPER has concluded that a supplement to the previously prepared EIS must be prepared to address potential adverse impacts resulting from the proposed expansion. Based on the information submitted to date and the scale of the project it is likely that the proposal will have direct and cumulative significant adverse environmental impacts on noise levels, air quality, habitat for fish and wildlife, and traffic safety.

The original EIS published in 1979 and the subsequent addendum issued in May 1987 did not fully address the following impacts:

Noise impact on area residents, in particular to properties west of the quarry. The
progression of mining to the west and above the steep cliff will expose the quarry's noise
to the residential properties to the west and to the north above the quarry. Additionally,
noise impact from the added crusher was not addressed and evaluated in previous
documents.

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- Degradation of water quality in the Raging River from loss of vegetated ground cover, and particulate air and water pollution (dust) from quarry operations, truck traffic, road maintenance and storm water runoff from on-site operations and the access road. The expansion of the mine will have a significant adverse impact to water quality of the river.
- Impacts to the Raging River's natural fish and wildlife habitats in light of the conservation laws enacted since preparation of the last EIS to protect threatened and endangered species.
- Air pollution from the progression of mining and dust from blasting on properties to the north and west. This has been an on-going issue which is exacerbated by the lack of a reliable on-site water source. With the lack of a permanent on-site water source, this impact was not addressed in previous documents and must be evaluated. Any proposed well to address this impact must also include any potential impact to the river's inflow.
- Land use and recreation. Since the publication of the previous documents, the area has gone through a significant population growth. In addition to residential uses, the surrounding area attracts people for its natural beauty and recreational opportunities.

The following is a brief discussion of the anticipated significant impacts of this proposal and what DPER will need to evaluate for purposes of SEPA review. Because of the size and duration of the project, a Supplemental Environmental Impact Statement (SEIS) would be an appropriate method to assess direct and cumulative impacts of this project and explore other alternatives and mitigations.

1. Noise

Noise from blasting and quarry operation needs to be analyzed for impacts to area residents. Ongoing and anticipated quarry operations have had a significant impact on the quality of life of rural residents and those who visit the area for its natural and recreational resources. The current proposal has not put forth mitigation of this severe impact of quarry operations. Significant impacts to ambient noise will result from the ongoing quarry operations and truck traffic and, in particular, to properties located to the west and north of the quarry. The quarry operation uses diesel powered machinery and a diesel generator which adds to the ambient noise of the site. Use of electrical power generating equipment should be considered.

2. Raging River - Fish and Wildlife Habitat - Water Quality

The Raging River is an important resource and provides fish habitat for a variety of species. Loss of forested land cover, dust and ground vibration poses potential significant

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impacts on this vital resource. Loss of vegetated land cover would impact retention of soil moisture, interflow and ground water which is critical to its water and habitat quality. Loss of vegetated land cover would increase flooding and surface flow which could impact the water quality and health of the river through increased turbidity introduction of metals and other contaminants, bank erosion, channel migration and other processes. Long term impacts to the health and wellbeing of Raging River, and its wildlife must be fully addressed. The impacts to the Raging River and its habitat, water quality and relevance to the Endangered Species Act needs to be thoroughly evaluated.

- 3. Air Quality- The quarry uses blasting techniques to loosen and dislodge earth material. The current operation has generated a large amount of dust after each blast and also during normal operation which is an on-going concern that is often exacerbated because of the lack of a reliable source of on-site water. Nearby residents and those above the pit have observed excessive dust rising above the pit and spreading across the valley. Poor air quality due to high particulate levels could result in health problems. The dust covering roads, vegetation and water sources would impact the surrounding built and natural environment, and contribute to the water quality concerns described above. This is a significant adverse impact that must be addressed in the SEIS.
- 4. **Traffic and Road Infrastructure** With increase in population in the vicinity of the mine and the expansion area, there will be potential traffic conflict between local automobile, school bus, and other traffic with truck traffic from the mining site. The long term traffic generated throughout the life of the mine expansion would have a potential severe adverse impact on traffic safety and the public road infrastructure including road bed, shoulders, and drainage systems and must be addressed within the SEIS.
- 5. Land Use & Recreation- A SEIS must evaluate the surrounding land use and address potential impacts on surrounding uses such as recreation and tourism activities which is vital to the economic development of the area. The impact on residential, recreational and economic development of the area must be fully evaluated.

This notification is to inform you as to the department's intended decision under SEPA but not the decision itself. You may wish to reconsider your proposal or alter your proposal prior to our threshold determination. If you elect to modify your proposal to mitigate the probable significant environmental impacts to the elements described above, DPER will reconsider the scope of the SEIS based upon a modified proposal.

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If you have any questions regarding this matter, please contact Fereshteh Dehkordi at (206) 477-0375 or me at (206) 477-0378.

Sincerely,

Randy Sandin

Resource Product Line Manager

Cc: Courtney Flora, McCullough Hill Leary, P.S. (via e-mail)

Devon Shannon, Senior Deputy Prosecuting Attorney, Civil Division

Steve Bottheim, Senior Ecologist, DPER

Laura Casey, Senior Ecologist, DPER

Fereshteh Dehkordi, Project Manager, DPER

Joe Barto, Engineer II, DPER