UELAND TREE FARM MINERAL RESOURCE DEVELOPMENT

Final EIS

Prepared for:
Kitsap County

August 2009

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SEPA Fact Sheet

PROJECT TITLE

Ueland Tree Farm Mineral Resource Development Project

PROJECT DESCRIPTION

Ueland Tree Farm, LLC (UTF) is proposing development of commercial sand, gravel, and basalt mineral surface mines on a portion of a 1,716-acre commercial forest land site owned by UTF. The UTF proposed mineral resource development site is located west of the City of Bremerton and Kitsap Lake in unincorporated Kitsap County. The proposal includes development of up to two sand and gravel mines and three basalt quarry areas. Optional development may also include a concrete batch plant, a railroad spur line, and a topsoil facility. Under the proposal, approximately 152 acres of the 1,716 acre site would be developed for surface mining and associated activities, not including connecting access roads.

The plan for mineral development at the UTF includes an estimated 50-year implementation period, with no more than one gravel mine and one quarry developed and operating at any given time. Anticipated annual production for the UTF Mineral Resource Project is estimated at a maximum of 400,000 tons of aggregate. Following mineral removal, each mine or quarry site would be reclaimed consistent with Kitsap County and Washington Department of Natural Resources reclamation standards and managed as working forest.

This EIS documents the analysis of three alternatives: the No Action Alternative, a Proposed Development Alternative, and a Reduced Scale Alternative. These alternatives are described below. A preferred alternative has not been identified at this time.

Alternative 1. **The No Action Alternative** was developed, as required by SEPA, to comparatively describe the project site and environmental impacts if the UTF Mineral Resource Project were not to take place. Potential future development of the project site would be limited to uses allowed under the current zoning and comprehensive plan designations.

Alternative 2. The Proposed Development Alternative proposes development of a 152 acre portion of the 1,716 acre site, as described above. This alternative assumes successive development of two sand and gravel mines, successive development of three basalt quarries, and construction of a concrete batch plant, a railroad spur line, a topsoil facility, an office, a shop, and truck scales. Development of this alternative would occur over the projected 50-year period.

Alternative 3. The Reduced Scale Alternative proposes a reduced level of development of the project components described in the Full Development Alternative. This alternative assumes successive development of two sand and gravel mines and two basalt quarries (Quarry A and C). The concrete batch plant and railroad spur line would not be constructed, and the top soil facility would be developed but at a lesser scale. A total area of 93 acres would be developed. The Reduced Scale Alternative would include the construction of other facilities necessary for operation, such as the office, shop, and truck scales. Development of this alternative would occur over an approximate 32-year period.

PROJECT LOCATION

The project site is a 152 acre portion of a 1,716 acre property owned by UTF in unincorporated Kitsap County, west of the city of Bremerton (see Figure 1-1). The site is located in Sections 12, 13, 24, and 25, Township 24N, Range 1W and Sections 7, 18, and 19, Township 24N, Range 1E.

SEPA LEAD AGENCY AND PROJECT PROPONENT

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PERMITS, LICENSES, AND APPROVALS REQUIRED OR POTENTIALLY REQUIRED

State and Regional Permits, Licenses, and Approvals

Puget Sound Clean Air Agency (PSCAA)

Notice of Construction

Washington Department of Ecology

Sand and Gravel General Permit

National Pollutant Discharge Elimination System (NPDES) Stormwater Permit

Section 401 Water Quality Certification

Washington Department of Fish and Wildlife

Hydraulic Project Approval

Washington Department of Natural Resources

Surface Mine Reclamation Permit

Local Permits, Licenses, and Approvals

Department of Community Development, Kitsap County

Conditional Use Permit

Site Development Activity Permit

Department of Public Works, Kitsap County

Right-of-Way Use Permit

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DATE OF ISSUE OF DRAFT EIS

February 27, 2009

END OF DRAFT EIS COMMENT PERIOD

4:30pm Monday, March 30, 2009

PUBLIC MEETINGS

A public meeting for the Draft EIS was held on March 25, 2009 from 6:30 PM to 8:30 PM at the Kings West School, located at 4012 Chico Way NW, in the City of Bremerton. Information about the public meeting was also posted on the county's we page, www.kitsapgov.com/dcd.

COMMENTS ON THE DRAFT EIS

Twenty-nine written comment letters were submitted from individuals, organizations, tribes and agencies on the Draft EIS. Comments and detailed responses are included in Appendix A, Response to Comments. The FEIS text has been largely unchanged from the DEIS text, however, Chapter 1 has been updated. All additional information in response to the comments is included in the Appendix, including discussion of proposed measures to mitigate adverse impacts.

DATE OF ISSUE OF FINAL EIS

August 12, 2009

DISTRIBUTION

The Distribution List for the Final EIS can be found in Appendix C of this document.

DOCUMENT AVAILABILITY

A limited number of hard copies of the document are available from the Kitsap County Department of Community Development, and at the Kitsap Regional Library in Port Orchard, free of charge. Compact discs are also available from Kitsap County DCD free of charge. The document is also available on the county's web page, www.kitsapgov.com/dcd.

Chapter 1 Project Description and EIS Summary

1.1 INTRODUCTION

Ueland Tree Farm, LLC (UTF) is proposing development of commercial sand, gravel, and basalt mineral surface mines on a portion of a 1,716-acre commercial forest land site owned by UTF. The proposed UTF mineral resource development site is located west of the City of Bremerton and Kitsap Lake in unincorporated Kitsap County (Figure 1-1). Development plans include up to two sand and gravel mines and three basalt quarry areas. Associated development may also include a concrete batch plant, a railroad spur line, and a topsoil production facility. Under the proposal, areas totaling approximately 152 acres would be developed for surface mining and associated activities, not including connecting access roads.

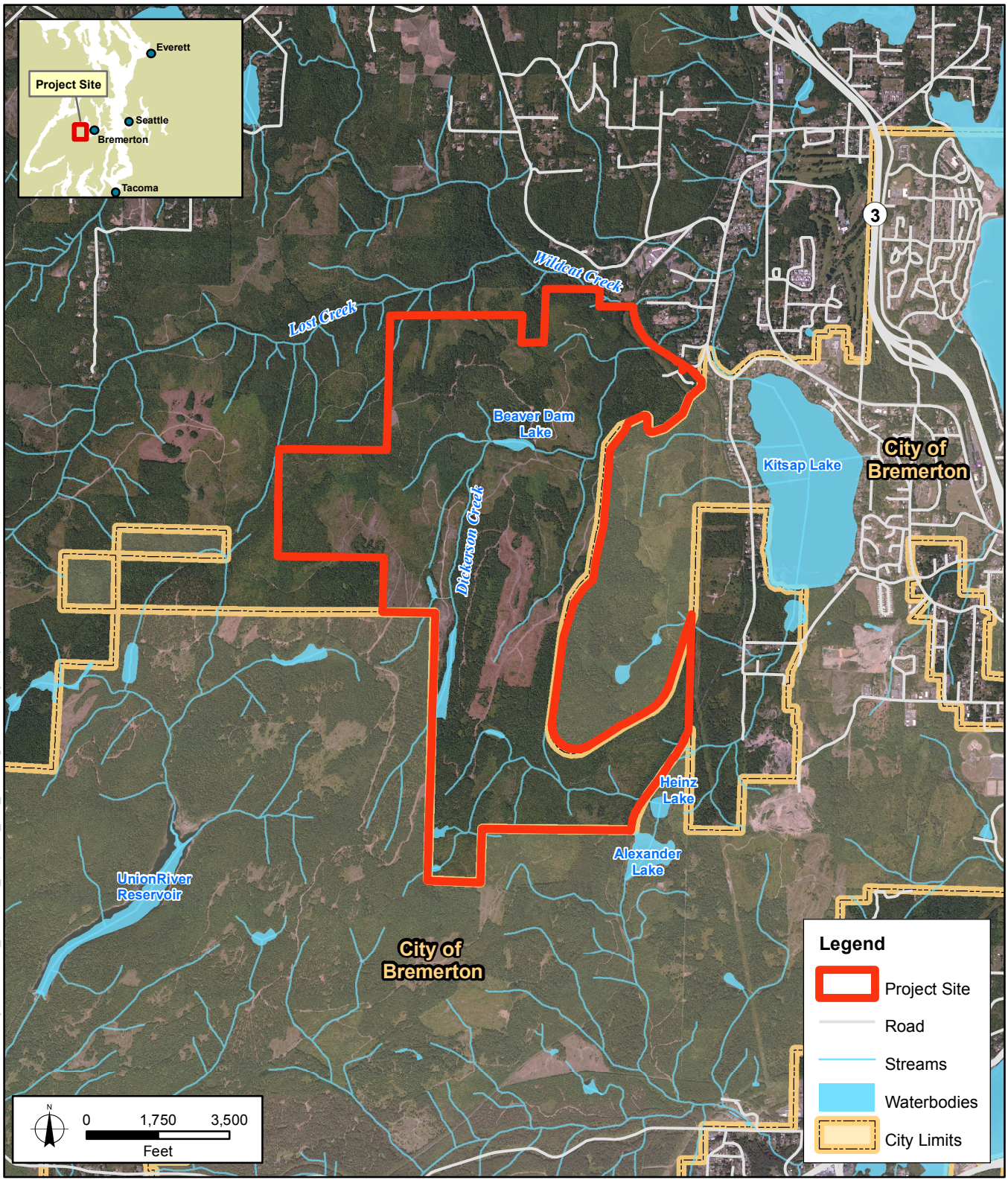
Under the Proposed Development Alternative, the mineral development plan at the UTF site would be implemented over an estimated 50-year period, with no more than one gravel mine and one quarry developed and operating at any given time. Anticipated annual production for the UTF mineral resource project is estimated at a maximum of 400,000 tons of aggregate. Following mineral removal, each mine or quarry site would be reclaimed consistent with Kitsap County and Washington Department of Natural Resources reclamation standards and managed as working forest.

This Final EIS, in combination with the Draft EIS, evaluates alternatives for potential mineral resource development at the UTF and discusses the associated environmental issues, such as air and water quality, noise, traffic, and land use compatibility, responds to citizen, Tribe, and agency comments received on the DEIS, and provides updated analysis where appropriate.

1.2 PROPOSED ACTION

1.2.1 PROJECT DESCRIPTION

The mineral resource development project proposes development of commercial sand, gravel, and basalt mineral surface mines on a portion of the UTF site. Two action alternatives and a no action alternative have been developed, as described in detail in Section 1.5 below. Development plans consist of up to two gravel mines, three basalt quarry areas, and associated facilities (Figure 1-2).



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SOURCE: DAIS, 2001; Kitsap Co, 2008; WDNR, 2008; WSDOT, 2007

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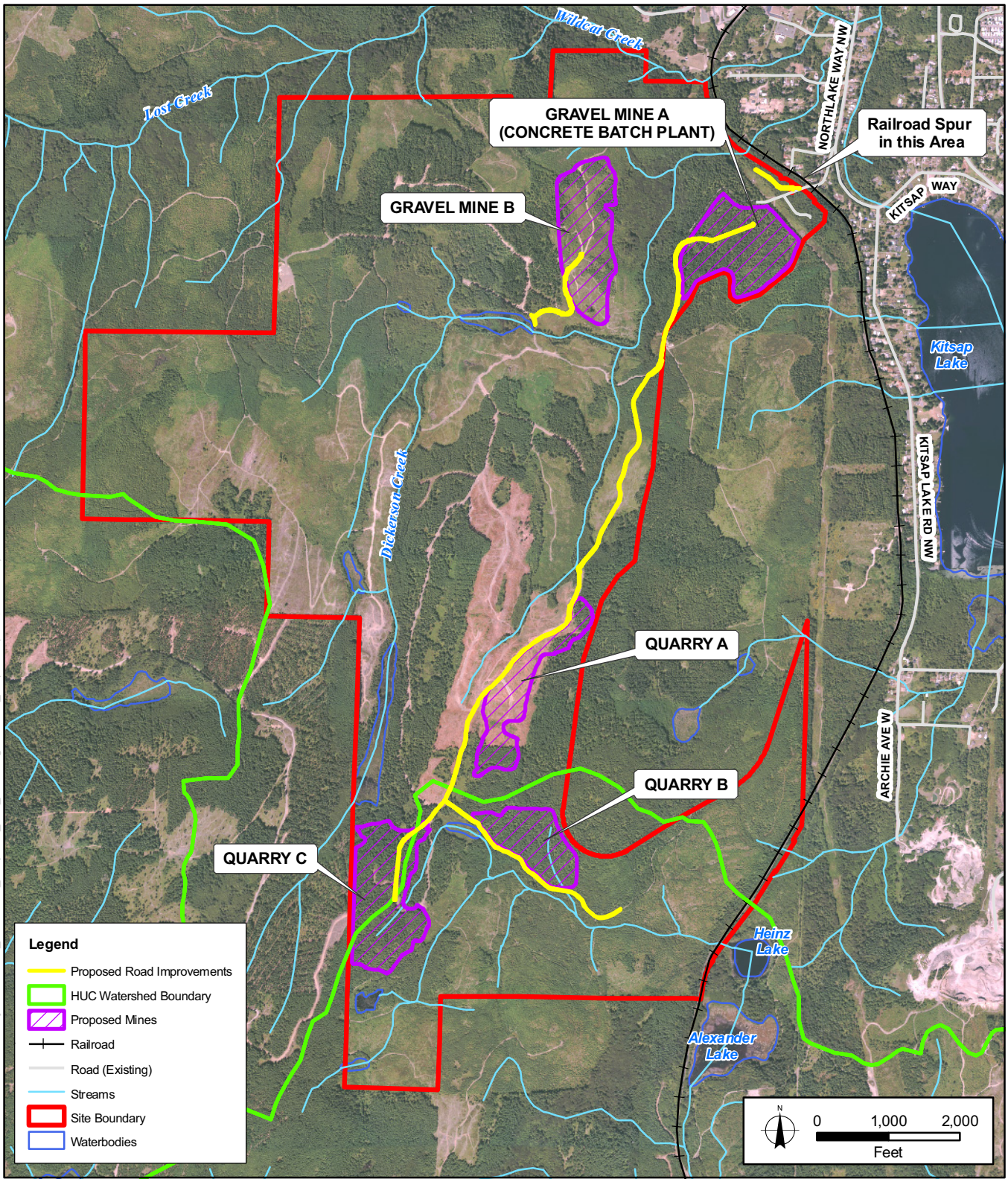
Figure 1-1
Vicinity Map



Ueland . 208407

SOURCE: DAIS, 2001 (Aerail); Kitsap Co, 2008; Parametrix, 2008; WDNR, 2008; WSDOT, 1997.

Figure 1-2
Site Map with Project Elements
Kitsap County, WA

1.2.2 SITE LOCATION

The UTF property is located in Sections 12, 13, 24, and 25, Township 24N, Range 1W, and Sections 7, 18, and 19, Township 24N, Range 1E. The UTF property (the entire area owned by Ueland Tree Farm LLC) is approximately 1,716 acres in area. The proposed project site (the area of proposed mineral resource activity) encompasses approximately 152 acres, roughly 9% of the UTF property. Figure 1-1 illustrates the location of the site. The UTF property is located within the Chico and Gorst Creek watersheds with the majority of the property in the Dickerson Creek sub-basin. The property is located between large tracts of open space and timber lands to the west and planned urban development (Bremerton urban growth area) to the east. The property is bordered by land owned by the Mountaineers Foundation to the north, the Department of Natural Resources (DNR) to the northwest and west, the City of Bremerton to the southwest, the Bremerton Watershed to the south, and Port Blakely Communities to the east.

1.3 PURPOSE AND NEED FOR THE PROJECT

The proposed mineral resource development project is intended to fill a need for mineral resources in Kitsap County and the surrounding region. At the present time, there are relatively few long-term mineral resource sites in Kitsap County that are located in areas that are feasible for development. This is particularly true for basalt quarries, which are relatively uncommon geologic features in the Kitsap Peninsula region. Currently, there are two primary basalt quarries in Kitsap County, both of which have finite resources.

The UTF project site contains more than 11 million cubic yards of commercial quality mineral deposits, including significant quantities of aggregate resources, and is located on rural property zoned for forest resource development. The location of the site adjacent to the Bremerton Urban Growth Area provides a resource location near urban areas in need of mineral resources. The close-in location could significantly reduce transport distances for mineral resources used in the area, including the potential to reduce long-haul trips from outside the county. This potential reduction of long-haul trips could lower the use of petroleum products and the accompanying emissions associated with truck trips. Development of mineral resources at the site in a manner that is compatible with adjacent land use would help to ensure that Kitsap County has adequate quantities of building materials available locally at competitive prices.

1.4 SUMMARY OF THE SEPA PROCESS

A Determination of Significance and Scoping Notice for the Project was issued by Kitsap County on June 23, 2008. A Scoping meeting was held on July 23, 2008, with approximately 10 people in attendance. The County received 13 comment letters regarding the proposal. The areas of concern and areas in need of additional clarification raised during the scoping process are summarized below.

Traffic

- Pedestrian/Bicycle Safety: Sidewalks are proposed along Lebers Lane; are there any other methods to protect pedestrians and bicyclists? **The EIS needs to discuss pedestrian/bicycle safety.**
- The proposal will generate too much truck traffic for residential roads. **Potential impacts from increased trucks on residential roads need to be evaluated fully in the EIS.**

- Railroad: If rail transport is to be included in the proposal, the EIS needs to bracket expected use (e.g. frequency of rail trips, number of railcars, times of rail movement) in order to be sure to cover future activities and avoid the need for subsequent SEPA documentation (e.g. addendum, supplement). A new rail spur and loading facility will need to be described. What approvals will be needed for use of the railroad? **The EIS needs to describe the full range of impacts associated with rail use.**
- School Bus Stops: Are school bus stops located in the vicinity of the site? If so, are there any safety issues related to truck traffic? **The EIS needs to describe safety measures to protect children at bus stops.**
- Will there be sales of aggregate to the public and/or contractors not associated with the operator? **Truck trips from aggregate sales need to be evaluated in the EIS.**
- Nuisance gravel: Cracked windshields from nuisance gravel along public roadways can be a problem? Will gravel truck loads be covered? **The EIS needs to describe measures to control nuisance gravel.**
- **The EIS needs to consider alternate access routes with reduced impacts.**

Noise and Vibration

- Blasting: It would be good to cite the experience of blasting at other locations (e.g. Mats Mats Quarry in Jefferson County). **The EIS should provide additional information on the expected frequency and duration of blasting operations.**
- Jake-brakes and Backup Alarms: **The EIS needs to address potential impacts of these noise sources, if they will be present**.
- Rock crushing and conveyor belt operation: **The EIS needs to describe noise impacts from these sources.**
- Vibration: Are there any risks to nearby residences (e.g. foundations)? The railroad tracks could be destabilized. **The EIS needs to describe potential impacts from vibration. The EIS needs to describe potential impacts to the railroad tracks from vibration.**

Wildlife

- Blasting: **The EIS needs to address potential impacts of noise, especially blasting on wildlife species**.
- **The EIS needs to describe the potential impacts of noise and dust on fish in Chico Creek.**
- **The EIS needs to describe the potential impacts to fish and wildlife from vibrations**.

Water and Wetlands

- What will be the expected volume of water purchased from the City of Bremerton? Does the city have adequate resources to provide this volume? **Impacts to public water supplies need to be described.**
- Asphalt: will there be an asphalt plant on the site? **The EIS needs to confirm the types of operations anticipated, including asphalt operations, and the potential impact on water supplies.**
- Is there any potential for mining operations (not including settling ponds) to create a new water feature on the site (e.g. pond or small lake)? **The EIS needs to consider potential to create new surface water features and the potential impact associated with that.**
- **The potential impacts to Kitsap Lake need to be fully described**
- **The full range of chemicals associated with rock extraction at the site (including arsenic and asbestos) need to be discussed, and their potential to enter surface and ground water.**
- **Need to describe the impacts to the 13 streams in the project area. Describe potential water diversions and their impact on streams and wetlands.**

- **The EIS needs to fully describe the potential impacts to residents around Kitsap Lake who rely on wells for their water supply**.

Air Quality/Public Health

- Public Health: Dust and silica sand are carcinogens. The threat to individuals with compromised immune systems needs to be fully described. **Public health issues associated with fugitive dust and associated metals need to be fully described**.
- **The EIS needs to evaluate the air quality impacts from the batch plant**.

Visual Impacts

- Simulations: The visual impact analysis shows locations from which the site operations will be visible. Can simulations be developed to show what the site will look like from these locations? **Visual impacts need to be fully characterized**.

Recreation

- **The trail system on the site needs to be maintained. Public access needs to be maintained**.

Action Alternative

- **An action alternative needs to be developed for evaluation in the EIS.**

The issues identified have been incorporated into the Draft EIS evaluations in the relevant sections. The Draft EIS was issued on February 27, 2009. A 30-plus day comment period included a public meeting, which was held on March 25, 2009. Twenty-nine written comment letters were submitted from individuals, organizations, tribes and agencies on the Draft EIS. The comment letters received included both support for and opposition to the project, with most of the comments requesting clarifying information about project details. These comments are included in Appendix A of the Final EIS, along with the response to each of the comments. The Draft EIS text has not been revised to address the comments; additional clarifying information is included in the responses to comments.

1.5 PROJECT ALTERNATIVES

The proposed project includes two development alternatives and a No Action alternative. The major features of the alternatives are described below.

1.5.1 NO ACTION ALTERNATIVE

The **No Action Alternative** was developed as a means to describe the project site and environmental conditions if the UTF Mineral Resource Project were not to take place. This alternative does not describe a proposal currently anticipated or proposed by the project proponent, but describes the actions that would be allowable based on existing land use regulations. Potential future development of the project site is anticipated to consist of uses allowed under zoning and comprehensive plan designations at the time of development. Currently, these designations are Rural Wooded (RW) and Forest Resource Lands (FRL). The RW and FRL zones allow for residential development of one unit per 20 acres and one unit per 40 acres, respectively, however, the project was previously subdivided at a density of one unit per 20 acres. The No Action Alternative provides a baseline against which to compare the effects of the two project alternatives.

1.5.2 PROPOSED DEVELOPMENT ALTERNATIVE

The **Proposed Development Alternative** calls for mineral resource development of 152 acres of the 1,716-acre property. This alternative is the proponent's preferred development approach. Potential mine areas were selected based on the resource investigations as well as other site-specific information, including the location of environmentally critical areas. This alternative assumes successive development of two sand and gravel mines, successive development of three basalt quarries, and construction of a concrete batch plant, a railroad spur line, a topsoil facility, an office, a shop, and truck scales. Anticipated annual production for the mineral resource project is estimated a maximum of 400,000 tons of aggregate. Approximately 11,700,000 cubic yards of aggregate material is proposed to be removed from the site over an estimated 50 year period.

The following sections outline the activities that would occur associated with the proposed facilities and operations. All operations are based on market demand for the product, so estimates are approximate based on a current understanding of market conditions. No residential development is proposed as part of this project alternative.

SAND AND GRAVEL MINES

Two sand and gravel mines, Gravel Mines A and B, are planned as part of the Proposed Development Alternative, which will be located on the north end of the UTF property (Figure 1-2). This portion of the site contains sand and gravel deposits suitable for commercial mining that can exceed 100 feet thick in some areas (Parametrix, 2007c).

Gravel Mine A, located nearest to the main entrance to the property, is 32.5 acres in area. An estimated 2,284,000 cubic yards (CY) of sand and gravel will be mined at this location. In addition to sand and gravel pits, the Gravel Mine A site will also house the crushing and washing facility, concrete batch plant, topsoil production facility, office, truck scales, and maintenance shop. Gravel Mine B is a 34-acre site located west of Gravel Mine A. This secondary site contains an estimated 952,000 CY of minable sand and gravel. Table 1-1 is a summary of the estimated mineral resource volumes within each of the planned mining sites.

Table 1-1 Summary of Mineral Resource Volumes

Site	Surface Area (acres)	Rock Volume (CY)	Topsoil Volume (CY)/Depth (in)	Overburden Volume (CY)/Depth (in)	Total Volume (CY)
Gravel Mine A	32.5	2,284,000	31,850 / 6	0*	2,315,500
Gravel Mine B	34	952,000	18,230 / 4	0*	970,000
Quarry A	25.3	1,870,000	20,430 / 6	183,800 / 54	2,074,000
Quarry B	21.3	2,300,000	17,210 / 6	137,700 / 48	2,455,000
Quarry C	39.2	3,386,000	31,600 / 6	442,300 / 84	3,860,000
Totals	**152.3**	**10,792,000**	**119,320**	**763,800**	**11,674,500**

Source: Parametrix, 2008.

* Overburden is the material being mined within Gravel Mines A and B, thus "Overburden Volume" is equal to the "Total Volume" for these sites.

The sand and gravel mining operation at each of the mine sites will involve first clearing the topsoil with a dozer. Vegetation removed during clearing will be chipped and retained for topsoil production or for reclamation. The sand and gravel will be mined in a dry or moist condition by open pit excavation with power shovels, front end loaders, and bucket wheel excavators. After mining, the materials will be transported to the processing plant by earth mover, truck, belt conveyors, or other means. Material mined from Gravel Mine B will be transported by conveyor or truck to the crushing and washing facility at Gravel Mine A.

BASALT QUARRIES

The Proposed Development Alternative plans for three basalt quarries in the southern portion of the UTF property (see Figure 1-2). As shown in Table 1-1, Quarry A covers 25.3 acres, Quarry B covers 21.3 acres, and Quarry C covers 39.2 acres. In these areas, the overburden layer is approximately 5 to 10 feet thick. Overburden is the top layer of soil that consists of a mixture of sand, gravel, and silt. Beneath the overburden layer, this area of the UTF property has basalt bedrock more than 80 feet deep, based on initial geotechnical investigations. The total volumes of basalt expected to be mined at each of the Quarries is shown in Table 1-1.

Rock and crushed stone products generally will be loosened by drilling and blasting. A rock drill is used to create a hole in the rock face for the explosives. After detonation, excavators will be used to sort the material. Loaders are then used to place the material onto a conveyor system or into trucks for transport to the crushing and washing facility located at Gravel Mine A.

In general, quarry blasting is designed to remove benches of material that range in width up to 50 feet or more. The depth of the bench is typically defined by depth of the blast hole and the length of the bench by the linear size if the working face. The frequency of blasting is likely to decrease over time as a larger (longer and deeper) working face is developed in the quarry. During quarry start-up, blasting may occur

at a more frequent interval (two to three times per month) due to the small working face. After several months when the working face has grown to a more efficient size, blasting frequency is expected to decrease to once or twice per month.

CONCRETE BATCH PLANT

A concrete batch plant would be constructed within the Gravel Mine A area (Figure1-2), depending on economic feasibility and market demand. Approximately 20,000 cubic yards per year of concrete is planned to be produced. Precast products may also be made on the site, and range from concrete bricks and paving stones to bridge girders and structural components.

Concrete is composed essentially of water, cement, sand (fine aggregate), and coarse aggregate. Raw materials for concrete production will be delivered to the site by rail or truck. The cement component is transferred to elevated storage silos pneumatically or by bucket elevator. The sand and coarse aggregate components are transferred to elevated bins by a front end loader, clam shell crane, belt conveyor, or a bucket elevator. From these elevated bins, the constituents are then fed by gravity or screw conveyor to weigh hoppers, which combine the proper amounts of each material. The components are gravity fed from the weight hopper into the mixer trucks. The concrete is mixed on the way to the site where the concrete is to be poured. The concrete may also be manufactured in a central mix drum and transferred to a transport truck.

CRUSHING AND WASHING FACILITY

Sand and gravel will be processed at the crushing and washing facility prior to use or sale at. The processing of sand and gravel will involve the use of different combinations of washers, screens, and classifiers to segregate particle sizes; crushers to reduce oversized material; and storage and loading facilities.

After being excavated and transported to the crushing and washing facility at Gravel Mine A, the wet sand and gravel raw material will be stockpiled or emptied directly into a hopper, which is covered with a "grizzly" of parallel bars to screen out large cobbles and boulders. From the hopper, the material is transported to fixed or vibrating scalping screens by gravity, belt conveyors, hydraulic pump, or bucket elevators. The scalping screens separate the oversize material from the smaller, marketable sizes. Oversize material may be used for erosion control, reclamation, or other uses, or it may be directed to a crusher for size reduction, to produce crushed aggregate, or to produce manufactured sands. Crushing will be carried out in one- to three-stage processes. Following crushing, the material is returned to the screening operation for sizing.

The material that passes through the scalping screen is fed into a battery of vibrating sizing screens. Rotating trommel screens with water sprays will also be used to process and wash sand and gravel. Screening separates the sand and gravel into different size ranges. Water is sprayed onto the material throughout the screening process to minimize dust. The sized gravel is then transported to stockpiles, storage bins, or crushers by belt conveyors, bucket elevators, or screw conveyors. The sand is freed from clay and organic impurities by log washers or rotary scrubbers. After scrubbing, sand is sized by water classification, and then dewatered using screws or separator cones. Finally, the sand is transported to storage bins or stockpiles by belt conveyors, bucket elevators, or screw conveyors.

TOPSOIL PRODUCTION FACILITY

A topsoil production and wood debris processing operation would be constructed within the Gravel Mine A area (see Figure1-2), depending on economic feasibility and market demand. Topsoil production

would consist of screening and mixing of soil materials from both on-site and off-site sources. The estimated amounts of topsoil that would be reclaimed by the mining operations are shown in Table 1-1. An estimated 20,000 tons per year of topsoil could be produced at the proposed facility.

SITE ACCESS AND INFRASTRUCTURE

Site access would be via Lebers Lane, which would be improved to meet Kitsap County road standards. Utilities would include water from the City of Bremerton, as well as power and natural gas. The small volume of domestic wastewater generated from the on-site office would be managed in an on-site sewage disposal system. Stormwater facilities would be designed, constructed and operated in accordance with Kitsap County standards and the National Pollutant Discharge Elimination System (NPDES) Stormwater Permit for sand and gravel facilities issued by the Washington Department of Ecology (Ecology). Stormwater facilities would be designed to slowly release water from the temporary man-made system and to support a wetland system following reclamation.

SITE RECLAMATION

Following mineral removal, each mine or quarry site would be reclaimed consistent with Kitsap County and Washington Department of Natural Resources (DNR) reclamation standards, using segmental reclamation methods. Reclaimed sites will be managed as tree farms and commercial forest. Segments would typically consist of approximately 10-acre areas that are cleared, mined, and reclaimed sequentially to minimize the amount of disturbed area open at any one time.

In a typical segmental reclamation process, soil in the first segment is stockpiled before mining to minimize handling and protect the resource. After the sand and gravel or basalt has been extracted from the first segment, its slopes would be reshaped according to the reclamation plan. Soil would then be stripped from the second segment, spread on the slopes of the first segment and planted with native grasses, shrubs, and trees. This process would continue until operations are complete in all segments of the mine. Reclamation is expected to be completed within two years of the completion of operations at any particular mine or quarry on the UTF project site. Topsoil would be salvaged and reused to ensure adequate vegetation for the reclaimed sites. Topsoil storage and stockpiles would be within the footprints of mine and quarry areas.

Reclamation would occur in the following stages:

- Back-filling the pits with non-saleable mine material soil from the quarry and/or clean soil imported from an off-site location;
- Grading the areas to conform to the proposed reclamation plan contours;
- Regrading the stormwater ponds to a more natural shape, placing sub-soil and top soil within stormwater pond areas to create conditions that would allow wetland hydrology and soils to develop, and revegetating the pond area with wetland and wetland buffer plants;
- Top-dressing the floor and slope areas with soils that would support native plant communities; and,
- Planting the area with native grasses, shrubs, and trees.

PROJECT SCHEDULE AND PHASING

Construction of the proposed UTF Mineral Resource Development Project is tentatively scheduled to begin in 2009, with mining operations beginning in 2010, depending upon issuance of the Kitsap County

Conditional Use Permit. The first construction phase would occur over approximately 12 months and will include the following project components:

- Improvements to some access roads (including Lebers Lane);
- Construction of the operational facilities (i.e., office, shop, utilities);
- Construction of the Crushing and Washing facilities, the Concrete Batch Plant, and the Topsoil Production facility;
- Preparation of the Gravel Mine A and Quarry A excavation sites (vegetation and topsoil clearing);

Subsequent construction phases will include periodic excavation and grading necessary for the preparation of individual mine sites. This would take place incrementally as the individual mines and quarries (approximately 10 acres each) are developed over the course of approximately 50 years. Gravel Mine B and Quarry Areas B and C would be developed successively following completion of mining activity on Quarry Area A. No more than one sand and gravel mine or quarry would be developed and operated at any given time. An estimated schedule for operation and reclamation of each mine site is shown in Table 1-2.

Table 1-2 Estimated Mining and Reclamation Schedule

Site	Operating Period	Reclamation Complete
Gravel Mine A	2010 – 2032	2033
Gravel Mine B	2032-2041	2042
Quarry A	2010 – 2022	2023
Quarry B	2022 – 2037	2038
Quarry C	2037 - 2059	2060

Source: Parametrix, 2008.

The normal working hours of the mining operation would be from 7:30 AM to 5:00 PM Monday through Friday, 52 weeks per year with no operations on holidays or weekends.

1.5.3 REDUCED SCALE ALTERNATIVE

The **Reduced Scale Alternative** proposes development of a portion of the project components described in the Proposed Development Alternative. In this alternative, the two sand and gravel mines and two of the basalt quarries (Quarry A and Quarry C) would be developed. The concrete batch plant and railroad spur line would not be constructed. The topsoil facilities would still be developed, but at a lesser scale. The Reduced Scale Alternative would include the construction of other facilities necessary for operation, such as the office, shop, crushing and washing facility, and truck scales. Reclamation features would be the same as described for the Proposed Development Alternative. This alternative proposes to develop approximately 93 acres of the UTF property for mining mineral resources over an approximate 32-year period. No residential development is proposed as part of the Reduced Scale Alternative. This alternative

was developed to provide an option that could feasibly attain or approximate the objectives for the project at a lower environmental cost. This alternative does not fully meet the proponent's objectives for the project.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

This document discusses the potential impacts of the proposed UTF Mineral Resource Development Project in terms of construction impacts (short-term) and operational impacts (long-term). For the purposes of this analysis, "construction impacts" are described as "site development impacts" and include the periodic excavation and grading necessary for preparation of individual mine sites. Site development impacts also include construction of permanent facilities, such as the buildings and utilities. Operational impacts are defined as those impacts resulting from the normal day-to-day operation of the mining facilities. All of the Site Development and Operational Impacts identified in this EIS are summarized below.

Table 1-3 Summary of Impacts and Mitigation Measures

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Geology/Soils Impacts	• Existing topography will be significantly altered. • Approximately 152 acres of the 1,716 acre site would be disturbed. • Erosion and sedimentation potential will occur during site development and during long term facility operation. • Mineral extraction will result in excavations from 30 to more than 150 feet below the surface; excavations will occur in 10-acre increments over a period of 50 years. • Approximately 400,000 tons of aggregate will be removed from the site. • There will be a potential for landslides within the active mining area until reclamation is completed	• Impacts to earth and soils are generally similar to the Proposed Development Alternative; however, the affected area would be 97 acres. • Excavation will occur in 10-acre increments over a period of approximately 32 years. • Erosion and landslide potential would be lower than that described for the Proposed Development Alternative, because the disturbed area is approximately 36% less. • Locally available aggregate will be available for approximately 32 years, instead of 50 years under the Proposed Development Alternative.	• Continued forest harvest activities could result in erosion associated with road construction and following harvest.
Geology/Soils Mitigation	• Project design will comply with all applicable reclamation and drainage standards included in Washington DNR Reclamation Permit. • Permit conditions include provisions to limit landslide and erosion potential, including requirements for maximum slopes during construction and reclamation, and surface water runoff requirements. • Following mineral removal, the site will be reclaimed, consistent with Kitsap County and DNR reclamation standards. Segmental reclamation will occur throughout the entire operation of the mine, minimizing the areas of exposed earth. Topsoil will be salvaged and re-used to ensure vegetation regrowth.	• Mitigation measures are the same as those for the Proposed Development Alternative.	• Forest harvest activities would continue in accordance with requirements of the Forest Practices Act, and Kitsap County requirements.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Air Quality Impacts	• Heavy equipment would create dust and exhaust emissions during site development activities. • Dust, emission impacts associated with mineral extraction will continue for up to 50 years. • Phased implementation of mineral extraction will help to localize impacts to the vicinity of the 10-acre parcel being actively mined. • The concrete batch plant will emit concentrations of toxic air pollutants, including arsenic, beryllium, cadmium and chromium. Modeling results indicate that all toxic air pollutants would be below the thresholds for Acceptable Source Impact Level (ASIL) established by the Puget Sound Clean Air Agency, and therefore considered to be safe. • Equipment used to operate the facility will contribute greenhouse gases to the atmosphere. • Reduction of long-haul trips required to bring aggregate resources into the County could potentially reduce greenhouse gas emissions.	• Impacts to air quality from the concrete batch plant would not occur under this alternative. • Dust and exhaust emissions would occur similar to the Proposed Development Alternative, but at a lower level due to a shorter project timeframe and reduced area of implementation.	• Air quality impacts associated with forest harvest activities would continue; dust from active harvest areas and vehicle emissions would continue. • Vehicle emissions would contribute greenhouse gases to the atmosphere.
Air Quality Mitigation	• Dust control measures will be employed in accordance with Puget Sound Clean Air Agency and Kitsap County requirements. • BMPs will be employed to reduce emissions from vehicles during site development and long term facility operation. These measures will help to reduce greenhouse gas emissions • Emissions from the concrete batch plant will be controlled using water sprays, enclosures, hoods, curtains, shrouds, movable and telescoping chutes, and central duct collection systems. • Incremental site reclamation following completion of mining activities will reduce the amount of exposed areas, thus reducing the potential for dust generation.	• Mitigation measures are the same as those described for the Proposed Development Alternative	• No specific mitigation measures are proposed. Continued forest harvest practices at the site would likely continue subject to existing permit conditions. Other proposed development would be subject to applicable regulations.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Wetlands/Surface Water Impacts	• Active mining will alter natural surface hydrologic pathways on the site. • Wetland contributing areas will be reduced in some cases by as much as 30%, but modeling indicates that wetland areas will not be negatively affected. • Wetland buffers for Wetlands 1 and 3 will be affected by site development, resulting in reductions in buffer width; however buffers will be added in other areas for the buffer averaging plan. • Basalt quarries could affect water quality entering on-site wetlands and streams, however, water quality BMPs will help to minimize impacts. • Runoff from the concrete batch plant could negatively impact downstream surface waters if discharged untreated; process water is proposed to be treated and reused rather than discharged to surface water bodies.	• Active mining will alter natural surface hydrologic pathways on the site; the effects will be less than those that would occur under the Proposed Development Alternative. • Elimination of the concrete batch plant will eliminate the potential for water quality impacts from this facility. • Effects to wetlands would be similar to, but to a lesser extent than those described for the Proposed Development Alternative.	• No wetland fill or buffer impacts would occur. • Impacts to surface water quality and quantity could occur associated with forest harvest practices.
Wetland/Surface Water Mitigation	• The proposed development will comply with all applicable regulatory requirements from the Washington Department of Ecology, Washington DNR, and Kitsap County. • Construction BMPs will be implemented consistent with Ecology requirements. • Buffer averaging will be done to maintain overall buffer areas for the regulated wetlands. • The project includes stormwater management and stormwater pollution prevention measures consistent with Department of Ecology and Kitsap County requirements. • The project proponent will analyze wetland water levels to ensure that water levels are not affected. If monitoring indicates significant reductions in water levels, operational practices will be modified to reduce the impacts. • The project proponent would monitor surface water flows in downstream locations to ensure that surface water hydrology is preserved.	• Proposed mitigation is the same as described for the Proposed Development Alternative	• Continued forest harvesting at the site would be subject to permit requirements associated with the Forest Practices Act.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Ground water Impacts	• Excavation will result in altered hydrologic pathways on the site, affecting infiltration patterns. Disruptions to drainage patterns would occur as 10-acre incremental areas are mined, prior to completion of reclamation. • The proposed drainage plan for the project promotes infiltration and intended to preserve existing hydrologic functions. • Domestic wells in the area are not expected to be affected by the facility operations • The quality of infiltrated water could be lower than under existing conditions.	• Impacts are similar to those described for the Proposed Development Alternative. • Elimination of the concrete batch plant will eliminate the potential for water quality impacts from this facility.	• There is minimal potential for impacts to ground water
Ground water Mitigation	• Stormwater will be managed in accordance with permit requirements from the Department of Ecology and will be routed through treatment BMPs prior to infiltration. • Groundwater levels and quality will be monitored by the project proponent, and reported to Kitsap County. Any negative changes in water quality or water levels will be addressed by modifying operational practices or making other adjustments to address the impact. • Stream flows will be monitored in Dickerson Creek to ensure that baseflows remain unaffected. Negative changes will be addressed through the proponent's adaptive management plan. • The project will comply with all applicable permit requirements for the Washington State Sand and Gravel Permit, and the Surface Mine Reclamation Permit.	• Mitigation is similar to that described for the Proposed Development Alternative.	• No specific mitigation is proposed.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Vegetation/ Habitat Impacts	• Trees and shrubs will be removed for development of the facilities, roads and mines. A total of 152 acres would ultimately be removed over a 50 year period. • Blasting operations at the site will adversely affect wildlife, particularly wildlife in the immediate vicinity of the blasting area. Some individual animals could lose hearing, and impacts could occur during the breeding and nesting season for birds. • Adverse impacts are not expected to occur to endangered, threatened or sensitive species. • Reclaimed sites may have reduced biological diversity as the sites revegetate. Invasive species could begin to grow if the site is not maintained. •	• A total of 97acres will be affected over the course of 32 years. Total impacts to vegetation, wildlife and habitat will be reduced from the Proposed Development Alternative. • Impacts from blasting would be similar to those described for the Proposed Development Alternative, but would be of lesser duration.	• Habitat would continue to be removed as part of forest harvest activities.
Vegetation/Habitat Mitigation	• The project footprint has been limited to 152 acres to minimize impacts to vegetation and habitat. • Segmental development of the site followed by reclamation will help to reduce the amount of disturbed area at any given time. • Site reclamation will provide habitat for species adapted to open areas, cliffs and talus, and waterfowl and pond-breeding amphibians. • Compensatory mitigation will be done in accordance with Kitsap County requirements.	• Mitigation measures are similar to those described for the Proposed Development Alternative.	• Revegetation would be conducted in accordance with Forest Practice Act requirements.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Noise/Vibration Impacts	• Site development noise levels could exceed recommended levels for residential areas; however, construction-related noise is exempt from Kitsap County noise limits. Site development activity would occur only during the daytime. • Long term noise will be generated by mining operations. This noise will likely be noticeable to surrounding residents; however, all predicted sound levels from the facility operations are within the Kitsap County daytime noise limit. • Blasting noise will be clearly audible to surrounding residents approximately 2-3 times per month. This frequency will decrease over time. Daytime blasting is exempt from Kitsap County noise limits; all blasting will occur during the day. • Vibration from blasting is projected to be well below levels that would result in structural damage. • Blasting impacts to wildlife will occur as described under Vegetation and Habitat.	• Impacts would be similar to the Proposed Development Alternative but at a lower magnitude and duration. • Noise from the Concrete Batch Plant and the rail spur would not occur.	• Noise impacts would continue in a manner very similar to current conditions.
Noise/Vibration Mitigation	• Site development activities and facility operation will operate in accordance with Kitsap County noise regulations. • Berms will be constructed around the northern half of Gravel Mine A and east of the processing and wash plants to act as a sound barrier. • Noisy facilities, such as the concrete batch plant, would be located at least 500 feet from the facility entrance to minimize noise impacts to nearby residences.	• Mitigation is similar to that described for the Proposed Development Alternative for site development and operational impacts.	• No mitigation is proposed.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Land Use Impacts	• Site development will create dust, noise and traffic impacts for surrounding residents, but the impacts are not expected to be significant. • The UTF Mineral Resource Development Project will alter land use at the site for a period of at least 50 years. Review of Kitsap County Planning Policies indicates that the project is generally consistent with the goals and policies of the county, and will be mitigated by BMPs and hours of operation. • A Conditional Use Permit is required for approval of the project. • Continued commercial forestry on the site would be consistent with existing zoning. • Mineral extraction is a permitted use within the existing FRL zone, and is generally compatible with WS and CUL-zoned properties west and south of the site. • Concrete batch plant operations may create nuisance noise and dust for surrounding residences.	• Impacts are similar, but reduced from those described for the Proposed Development Alternative. • Impacts associated with the concrete batch plant would not occur.	• The UTF property would continue to operate as a working tree farm. Any proposed development would need to comply with existing zoning designations. • Existing zoning would allow residential development to occur at one unit per 20 acres, should the project not be implemented.
Land Use Mitigation	• The proposed project will comply with all applicable Kitsap County and Washington state land use, noise, and air quality permit requirements. • The project will use existing topography and vegetation to the extent possible to limit noise and visual impacts. • The proposed segmental development of the property and incremental reclamation will limit the amount of disturbed area at any given time, which will help to reduce impacts to surrounding residences.	• Mitigation is similar to that described for the Proposed Development.	• Any development would occur in accordance with existing zoning, plans and policies.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Transportation Impacts	• Site development will create construction-related traffic on local roadways. Temporary traffic delays could occur. • Operation of the facility will increase traffic on local roadways by as much as 186 vehicle trips per day (based on one trip in and one trip out per vehicle). • The intersection of Lebers Lane, Grover Lane, and North Lake Way does not meet County standards and will be reconstructed by the project applicant to meet County standards. • The North Lake Way and Lebers Lane Intersection reconstruction will maintain the Level of Service at existing levels (B) but will increase the average delay per vehicle by two seconds. • Proposed construction of a rail spur would require approval by the U.S. Department of Defense, owner of the adjacent rail line.	• Impacts to traffic will be reduced by overall reduction of vehicle trips from the site. • There will be no rail spur, so approval by the DoD will not be required.	• Traffic conditions in the project area will be largely the same as current conditions.
Transportation Mitigation	• The project proponent will widen North Lake Way, and provide a center turn lane and a center acceleration/merge lane for left turns. • The project proponent will provide pedestrian improvements subject to County road standards for the appropriate road classification. • The project proponent will provide a sidewalk along one side of Lebers Lane, and will improve sight distance, stopping distance, turning radii, and increased shoulder width. • The project proponent will complete the pedestrian connection on Lebers Lane to North Lake Way. • The project will employ measures to reduce nuisance gravel, including paving the road, providing a wheel wash facility, and periodic street cleaning.	• Mitigation is the same as described for the Proposed Development Alternative.	• Roadway improvements proposed as part of the project would not be conducted.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Aesthetic Impacts	• The proposed project will alter the visual characteristic of the site. The existing topography will be altered and mine sites could appear as pockets of industrial character surrounded by forest. These pockets of mining will vary over the years as sites are incrementally mined then reclaimed. • The site could be visible from the eastern shore of Kitsap Lake, from Seabeck Highway, from SR3 at Chico Bay, and from viewpoints in West Bremerton, East Bremerton Port Orchard, and Silverdale; however, forested areas in between would likely block views of the project site from these viewpoints. • Some individuals will perceive the changed viewscape negatively.	• Impacts will be similar in nature but reduced in scale from the Proposed Development Alternative.	• The existing views of the site would be altered as forested areas are harvested.
Cultural Resources Impacts	• Based on cultural resource surveys conducted in the area, the site has a low probability of archeological or cultural resources, and the site development and operation is not expected to affect cultural resources.	• Impacts are the same as described for the Proposed Development Alternative	• Potential impacts would be the same as under the current operations.
Cultural Resources Mitigation	• Should potential cultural resources be discovered during site development or mining activities, earth disturbing activities would be stopped until a professional archeologist could assess the situation.	• Mitigation is the same as described for the Proposed Development Alternative	• No mitigation is proposed.
Recreation Impacts	• Site development activities could temporarily limit or eliminate some informal trail use at the site. No formal recreational areas would be affected. • Informal recreational areas adjacent to mining areas would likely be unavailable during operation. Large portions of the site would continue to be available for informal recreational use, subject to the approval of the property owner. Overall, impacts to recreation are not expected to be significant.	• Impacts are similar to those described for the Proposed Development Alternative.,	• Impacts would occur associated with continued forest harvest; these are expected to be minimal.
Recreation Mitigation	• Incremental mining in 10-acre segments, followed by reclamation, would preserve much of the informal recreation opportunity at the site should the owner choose to continue to allow public access.	• Measures would be the same as those described for the Proposed Development Alternative	• No mitigation is proposed.

ENVIRONMENTAL ELEMENT	PROPOSED DEVELOPMENT ALTERNATIVE	REDUCED SCALE ALTERNATIVE	NO ACTION
Public Services and Utilities Impacts	• Vehicles associated with site development could create delays on local roadways, potentially affecting the movement of emergency vehicles. • Reduced infiltration of water could affect the shallow aquifer at the site; however, the shallow aquifer is not used for drinking water supply. • No other utilities are anticipated to be affected by the proposed project.	• Impacts are similar to those described for the Proposed Alternative.	• No impacts to public services or utilities are anticipated.
Public Services and Utilities Mitigation	• The project proponent will coordinate with all potentially affected public services and utility providers to reduce the potential for conflict during site development and long term facility operations. • The project will comply with all applicable permit requirements, including local drinking water, stormwater and solid waste utilities.	• Mitigation would be the same as described for the Proposed Alternative.	• No mitigation is proposed.

1.7 COMMENTS ON DRAFT EIS

Twenty-nine written comment letters were submitted from individuals, organizations, tribes and agencies on the Draft EIS, and more than 100 people attended the public meeting held on March 30, 2009 at the Kings West School in Bremerton. The largest number of comments received was related to concerns about traffic: traffic congestion along Lebers Lane and Northlake Way, noise and dust from truck traffic, safety issues for pedestrians and school children, and concerns about how the additional truck traffic will change the character of the area. Commenters requested that a southern access option be explored, which would reduce impacts to residents along Lebers Lane and Northlake Way. Numerous comments were received relating to concerns about impacts to the wetlands on site, potential water quality and flooding impacts to Chico Creek, Dickerson Creek, and other surface water bodies in the area, and impacts to wildlife and habitat from the development on the site. A number of comments were received requesting additional clarification about monitoring; this information is included in Table 1-4, below.

Comments and detailed responses are included in Appendix A, Response to Comments. The FEIS text has been largely unchanged from the DEIS text, however, Chapter 1 has been updated. All additional information in response to the comments is included in the Appendix, including discussion of proposed measures to mitigate adverse impacts.

Southern Access

A number of comments were received requesting an evaluation of an additional southern access route to the site, thus avoiding impacts to homes along Lebers Lane and the surrounding neighborhood. This option, which was initially evaluated and determined to be infeasible by UTF, was revisited following release of the DEIS. UTF contracted with a consultant, ESM, to evaluate two potential south access options. This evaluation, *Ueland Tree Farm Mineral Resources Development Access Feasibility Analysis (ESM, May 2009)*, is included in Appendix B.

The first option, which is the most direct route to the southern portion of the site, would require purchase of eight private properties, because the access route is on property not currently owned by UTF. Steep slopes on either side of a valley would require extensive cut and fill for the roadway, and site conditions would make stormwater management very difficult, resulting in potential impacts to adjacent surface waters. The alignment passes through currently undeveloped area, resulting in potential impacts to streams, wetlands, steep slopes, and a wildlife corridor which connects Kitsap, Heinz, and Alexander Lakes.

The second option also requires crossing property not currently owned by Ueland, with a resultant need to purchase six properties and permission to pass through the City of Bremerton watershed. The City of Bremerton Public Works Director has stated that the City will not allow truck access through the Bremerton watershed (Williams, personal communication, June 24, 2009). This option has a total length of 2.5 miles, compared with 1.5 mile for Option 1. The roadway length is increased to avoid the valley's steep slopes near the south end of the site and to avoid two small lakes in the area, Heinz Lake and Alexander Lake. However, by avoiding the steep slopes, the alignment crosses a number of sensitive natural resource areas, resulting in potential impacts to streams, lakes, and wetlands. Figure 2 in Appendix B illustrates the roadway alignments.

The ESM report concluded that the southern access routes are not feasible, and that the north access alignment (carried forward in the Draft EIS as the Proposed Development Alternative) is more feasible to implement because it is outside known sensitive areas, and all construction could be done either in the public right of way or on property owned by UTF.

Kitsap County has reviewed the evaluation and concluded that the southern access options are not feasible. While the southern access options would result in lower potential impacts to the residents along access road and have the benefit of more direct freeway access via Werner Road, which is abutted by Industrial, Commercial, and Urban Residential zones,, they would result in more significant potential impacts to sensitive natural resources, including streams, wetlands, and wildlife. In addition, UTF does not own the potentially affected properties, and does not have the ability to condemn the properties if the owners were unwilling to sell. Because a reasonable access route currently exists that can meet all applicable design standards, as proposed by UTF, the County will not require evaluation of an additional, potentially infeasible alternative, thus evaluation of the southerly access routes were not carried forward for additional evaluation in the FEIS.

1.8 SUMMARY OF MAJOR CONCLUSIONS

The Proposed Development Alternative will result in impacts to surface and ground water, vegetation and habitat, air quality, noise, land use, recreation and aesthetics. Mitigation measures have been developed by the proponent and through compliance with applicable permits, policies and regulations that will reduce nearly all of these impacts to levels of non-significance, assuming that the mitigation measures are implemented as intended. One exception is potential impacts to wildlife associated with blasting. Wildlife species in the immediate vicinity of on-site blasting could be injured or killed by intermittent blasting noise, and there is no effective way to completely mitigate this impact. It is not possible to project the number of individuals affected by blasting, because the blasting will occur up to three times per month throughout the year.

As noted above, it was determined that a southerly access is not feasible. Construction of a southerly access road would have fewer impacts to the built environment, but would result in greater impacts to the natural environment. Comparatively, the proposed northerly access would have greater impacts on the built environment (e.g., additional truck and car traffic near residences), but would not result in significant impacts to the natural environment. In addition, proposed mitigation and roadway/intersection improvements would mitigate most of the northern access route impacts to levels of non-significance. Mitigation of impacts to the natural environment associated with the southerly access options would be more difficult to successfully implement.

The proponent has developed a monitoring program for surface and groundwater, and wetlands, and will implement an adaptive management plan. This will help to ensure that unintended impacts do not occur, and that if they do, measures would be taken to reduce those impacts. The proposed monitoring programs are summarized in Table 1-4 below.

Table 1-4 Summary of Monitoring Programs

Monitoring Element	Applicable Regulation	Responsible Agency	Locations	Parameters	Monitoring Frequency	Reporting Frequency	Responsible Party
Surface Water Quality	NPDES Stormwater Permit	Department of Ecology	All stormwater discharges to surface water [1]	Turbidity Oil Sheen Temperature pH	Twice/month Daily Weekly Monthly	Quarterly	UTF
Groundwater Quality	NPDES Stormwater Permit	Department of Ecology	All stormwater discharges to ground water [2]	pH Visible Oil Sheen	Quarterly Daily	Quarterly	UTF
Groundwater Quality	Kitsap County CUP	Kitsap County [3]	Gravel Mine A Monitoring Wells [4]	Total Petroleum Hydrocarbons Turbidity Total Dissolved Solids pH	Quarterly for first 5-yrs, then bi-annually	Annual [5]	UTF
Groundwater Levels	Ecology 2005 Stormwater Manual	Kitsap County	Gravel mine infiltration pond locations	Groundwater Elevation	Monthly for 1 year/wet season prior to operation	Annual	UTF
Wetland Hydroperiod Monitoring	Kitsap County CUP	Kitsap County	Wetlands 1,2,3,5,7,9,12,17, 19	Water Levels, Vegetation	Monthly for first year, then quarterly	Annual	UTF
Air Quality	Notice of Construction	PSCAA	Rock Crushing Plant	Opacity	Daily	NA [6]	UTF

Notes:

[1] Stormwater discharges to surface water will occur at basalt quarries and access road sediment ponds.

[2] Stormwater discharges to groundwater will occur at Gravel Mine A and B.

[3] Department of Ecology would be responsible agency if State water quality standards are exceeded.

[4] Four groundwater quality monitoring wells are proposed at Gravel Mine A.

[5] Monitoring results that exceed State water quality standards will be reported within 10 working days.

[6] Puget Sound Clean Air Authority (PSCAA) does not typically require opacity testing to be reported.

The proposed development plan includes an incremental mining program, resulting in development of approximately 10 acres at a time, followed by incremental reclamation. This will reduce the amount of earth disruption at any given time, and provide staged revegetation in disturbed areas. This approach will help to reduce the impact to surface and ground water, wetlands, and wildlife habitat.

With implementation of mitigation measures as outlined within the document, significant impacts from the proposed project will be minimal for either the Proposed Development Alternative or the Reduced Scale Alternative.

1.9 AREAS OF CONTROVERSY AND UNCERTAINTY

Controversy relating to the project has centered on issues identified during Scoping and in comments on the Draft EIS, including impacts to local area roads and adjacent residents, potential concerns relating to airborne particulates and associated contaminants, noise during operation, potential impacts to fish and wildlife in the area, and impacts to surface and ground water quality. These issues have been addressed in the document, with mitigation measures identified. Additional discussion of these issues to directly address comments is included in Appendix A, Response to Comments. Many neighbors of the UTF site have expressed opposition to the development, because of concern about impacts to traffic, noise, and dust which they feel will significantly affect the rural character of the area.

Uncertainty regarding the proposal relates to market demand for mineral resources, which will affect the overall mining schedule. Impacts were evaluated considering the most likely schedule of mining; a significantly accelerated schedule would require an adjustment in some mitigation measures.

1.10 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Most impacts identified in this evaluation would not be significant following implementation of identified mitigation measures, which will receive consideration through the Conditional Use Permit process. Potential impacts to wildlife associated with blasting noise, however, may not be avoided or mitigated to a level of non-significance. There may be some permanent loss of wildlife, particularly those sensitive to noise.

1.11 EXPLANATION OF TERMINOLOGY

In this EIS, a number of terms are used throughout the document to describe the project proponent and the UTF. Definitions as used in the document are included below:

UTF Mineral Resource Development Project: the proposed project.

UTF property: the entire 1,716 acre property owned by Ueland Tree Farm, LLC.

UTF project site: the 152 acre area proposed for active mining.

UTF study area: an expanded project site area to include potential offsite areas affected by the proposal. In most cases, this includes an approximately 300-foot wide strip around the area being evaluated.

Appendix A
Comments on the Draft EIS
and
Responses to Comments

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

March 30, 2009

Mr. David Greetham, SEPA Coordinator
Kitsap County Department of Community Development
614 Division St
Port Orchard, WA 98366

RE: Ueland Tree Farm Mineral Resource Development Project Draft Environmental Impact Statement (Ecology #EIS 091147)

Dear Mr. Greetham:

Thank you for the opportunity to comment on the Environmental Impact Statement for the Ueland Tree Farm Mineral Resource Development Project. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

Comments from Water Quality Program, Jerry Shervey (425) 649-7293.

1-1 All concrete products manufacturers and property owners (or operators) of sand and gravel pits, rock quarries, asphalt and concrete batch plants are required to apply for permit coverage under Ecology's Sand & Gravel General Permit. Permit coverage is required for discharges of rain water runoff and water used in processes into the ground or surface water. You may download the application form and instructions from the Internet at http://www.ecy.wa.gov/programs/wq/sand/index.html. If you do not have Internet access call Tricia Miller at (425) 649-7201 for application materials. Ecology must receive your application at least 180 days before the start of operations. Mail your completed application to:

Tricia Miller , Water Quality Permit Coordinator
Washington Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452

1-2 You will also need to submit an engineering report with the permit application for any treatment systems planned on the site. Treatment systems include flows from any waste water created by making concrete, washing rock or aggregate, or treating rain water runoff prior to discharging it off site. The engineering report should describe how the treatment system assures discharges will meet surface and ground water quality standards in state regulation. Include a schematic

1-2 diagram, engineering drawings, and calculations for sizing treatment components. Designs involving stormwater must be based on meeting permit conditions for the 10-year, 24 hour precipitation event.

Comments from Shorelands Environmental Assistance Program, Richard Robohm (425) 649-4447.

Wetlands

1-3 The DEIS proposes impacts on the buffer of Wetland 1, a Category III wetland with a habitat score of 27. The relatively high value of this wetlands habitat function (second highest of all wetlands on site that were rated) may not be adequately protected after the proposed reduction of buffer widths on the wetland's west side to accommodate the proposed mine footprint. This is true even with proposed widening of the buffer on the east side for the purpose of buffer averaging. Quarrying and gravel mining would introduce a level of disturbance into the area high enough to drive many species out of the habitats in and around this wetland. The narrower the buffer on the side of this disturbance, the more likely this is. The DEIS notes that the buffer along the east side of Wetland 1 is mature coniferous forest and therefore of a higher quality than the buffer on the west, a young mixed forest of [very] small trees (<10 ft. tall) and shrubs. While it is good that the expanded buffer on the east side would be of a high quality, the lower quality of the buffer on the west side means that it is even less likely to protect the wetlands habitat functions when it is reduced. Expanding and enhancing the buffer on the side of the mining and quarrying operations would be the best way to mitigate their impacts on wetland functions.

1-4 Although direct wetland impacts appear to be avoided, indirect impacts from changes to surface and groundwater may very well occur. The *Mineral Resource Development Groundwater and Wetlands Monitoring Plan* (Appendix C) proposes to monitor potentially affected wetland areas. In addition to recording data from staff gauges after operations begin, baseline wetland hydroperiods should be documented by recording data from staff gauges and shallow groundwater monitoring wells. These wells and gauges should be located in areas considered most vulnerable to changes in hydroperiod, both near wetland boundaries and in areas of seasonal or periodic inundation. Any loss in wetland area or function should be made up by appropriate compensatory mitigation. Mitigation opportunities and contingency plans should be discussed as part of this proposal.

Streams

1-5 The DEIS states on page 6-10 that "No streams or stream buffers occur in any areas proposed for mine or quarry development. Based on field observations documented in the Wetland Delineation and Stream Identification Report (Parametrix, 2007g), approximately the uppermost 750 feet of a watercourse that was mapped in the Kitsap County GIS as passing through proposed Basalt Quarry C were determined not to meet the definition of a stream per KCC 19.150.635." The validity of this assertion is not obvious from looking at the features labeled "streams" that run through portions of Quarry B and Quarry C in Figures 1-2 and 4-2 of the DEIS. This apparent inconsistency needs to be explained more fully. Even if a feature does not meet the definition of a stream in the Kitsap County Code, it may still be considered a stream by the state Department of Fish and Wildlife or waters of the U.S. by the U.S. Army Corps of Engineers.

For more information about SEPA and Ecology visit www.ecy.wa.gov/programs/sea/sepa/e-review.html.
The Office of Regulatory Assistance (ORA) can help you determine local, state, and federal permits required for your project. Visit us at www.ora.wa.gov or contact us at help@ora.wa.gov or 1(800)917-0043.

CZM

1-6 The DEIS does not mention the federal Coastal Zone Management Act. Any project in a coastal county, including Kitsap County, that needs a federal permit must submit certification to the Department of Ecology that the proposed actions are consistent with Washington's Coastal Zone Management Program. Ecology then makes a decision to concur, object, or condition.

Ecology's comments are based upon information provided by the lead agency. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments please contact the appropriate reviewing staff listed above.

Tamara L. Sacayanan
SEPA Coordinator
Department of Ecology
Northwest Regional Office
(425) 649-7131

(S#: EIS 091147)

cc: Jerry Shervey
Richard Robohm
Alice Kelly
Lynette Loyden

COMMENT LETTER NO. 1 – WASHINGTON STATE DEPARTMENT OF ECOLOGY

1-1.	Comment acknowledged. A Sand & Gravel General Permit Application for Coverage will be submitted a minimum of 180 days prior to commencing operations. A public Notice of Application will be published as directed by Ecology, including circulation in a County-wide newspaper.
1-2.	Comment acknowledged. An Engineering Report for stormwater and process water (as applicable) control will be submitted with the Sand & Gravel General Permit Application for Coverage.
1-3.	The Wetland Delineation Report (available at uelandtreefarm.com) describes the primary functions contributed by Wetlands 1 and 3 as habitat-related. Based on the standards presented in KCC 19.200.220(C), buffer averaging for Wetlands 1 and 3 can provide habitat functions and values equal to or greater than would be provided under the standard buffer requirement for the following reasons: 1. As part of Quarry A design process, UTF reduced the size and located the eastern boundary of Quarry A to minimize the decrease in Wetland 1 buffer while also maintaining the feasibility of the quarry site. As shown in the buffer averaging analysis presented in the Wetland Delineation Report, and the additional information provided below, the buffer averaging design of Quarry A avoids significant impacts to Wetlands 1 and 3 and also maintains wetland functions and values. 2. No documented habitat for endangered, threatened, or sensitive fish or wildlife species occurs in Wetland 1 or 3, or their associated buffers. 3. Buffer averaging would not adversely impact the habitat value of the wetlands because the habitat value west of the wetland, where a maximum 50-ft buffer reduction would occur, is not as great as the habitat value east of the wetlands, where a 50-ft buffer expansion is proposed. The area west of Wetlands 1 and 3 consists of clear-cut forest less than 10 years old. No snags are present and large woody debris is scarce. The lack of mature vegetation and large woody debris in the west buffer area (where buffer width is proposed to be reduced by 50-ft) limits its current value as wildlife habitat due to lack of structural diversity. 4. To compensate for buffer reduction to the west, the Wetland 1 buffer would be expanded by 50-ft into the forest stand east of the wetland. This forest stand is approximately 60 years old, dominated by Douglas-fir with an average tree height of approximately 100 feet, with a well-developed sub-canopy layer of shrubs and western hemlock seedlings. The vegetation community along the east side of the wetlands is several decades more advanced than the community along the west side, which results in the buffer providing more functions to the wetland. This east buffer area has significantly higher wildlife including ample evidence of use by wildlife species such as deer, black bear, and woodpeckers.

5. When mining and reclamation of Quarry A is completed in approximately 10 years, the land use at the mine site would revert to commercial forestry, which has an impact rating of "low," due to the temporary nature of the impact, per KCC 19.200.220(B). The corresponding buffer width requirement for Wetland 1 would then be 75 feet (50-foot base plus a 25-foot increase), and 60-ft (50-foot base plus a 10-foot increase) for Wetland 3. In its final reclaimed form, therefore, Quarry "A" would not impinge on any of the buffer for Wetland 1, and only about 10 percent of the Wetland 3 buffer. A slope transition (from 4:1 to about 10:1) that coincides with the buffer averaging area ensures that the slope area between the proposed quarry and Wetland 1 is maintained during quarry operations to provide an effective noise and visual screen, as well as vegetative corridor that connects to other wetland areas on the UTF site.

6. The Wetland 1 and 3 buffers associated with the mine operation will be protected in perpetuity and would not be harvested as could be allowed under Forest Practices regulations. Under Forest Practices regulations, the undisturbed buffer on the east side of Wetland 1 could potentially be harvested up to 25-ft from the wetland boundary. The permanent protection of the 200-ft expanded buffer east of Wetland 1 would result in greater net habitat benefit because of the higher quality habitat that exists in this area. The wetlands and the final buffer boundaries will be included on maps and given long term protection following 19.100.150 of the KCC.

7. The total buffer area after averaging is larger than the buffer area prior to averaging (see Table 4.1 in Wetland Delineation Report). The buffer averaging proposal therefore provides a larger net area of mixed wetland and upland habitat. Because there is no net loss in buffer area, the buffer averaging plan would result in no net loss of wetland function.

8. For clarification, the minimum buffer around Wetland 3 would be 50-ft as shown in the reclamation plan drawings. The Buffer Averaging Plan shown in Figure 6-1 has been revised to reflect this change. The 50-ft buffer averaging area extends around approximately 20 percent of Wetland 3. The remaining buffer area width meets or exceeds the 80-ft buffer required by KCC.

9. Buffers of at least 50 feet are generally necessary to protect wetlands from sediment and nutrients, direct human disturbance, and the adverse effects of changes in quantity of water entering the wetland. The buffer averaging proposal provides at least a 50-ft buffer, maintains the size and location of hydrologic boundaries of both Wetlands 1 and 3, and preserves existing wetland hydrology. The proposed buffer averaging does not, therefore, change hydrology or water quality functions. The combination of topography and controlled access will prevent direct human disturbance of the buffer area. Sensitive area signs will also be placed along the wetland buffer boundary pursuant to KCC requirements.

10. Quarrying and mine activities may result in some wildlife species avoiding the wetland and buffer area during active operations, and will result in the direct loss of habitat in the active mine areas. This avoidance would be likely whether the buffer is 100-ft (as proposed in some averaging areas) or the standard 150-ft under the Kitsap

	County CAO. The impact of wildlife avoiding the buffer and wetland area is mitigated by several factors, including: 1) The additional 50-ft of mature forested buffer on the east side of Wetland 1 would provide refuge for wildlife disturbed by mine operations. The impact of timber harvest of this added 50-ft east buffer area (which may occur if it is not part of the Wetland 1 buffer averaging area) is greater than residual noise and disturbance associated with the mine operation. 2) The quarry will be in operation for about 10 years, after which site operations will cease and the site will be reclaimed, which will eliminate the noise and human presence that may contribute to wildlife avoidance of the site. 3) The UTF site provides extensive, suitable refuge habitat in other areas. In summary, the buffer averaging proposal reflects avoidance measures, does not adversely effect habitat, meets buffer widths necessary to protect water quality and hydrologic functions, provides more net total buffer area, and preserves a greater amount of the highest quality buffer area that otherwise would not be protected. Based on these factors, the buffer averaging proposal is consistent with both the specific requirements and the intent of KCC provisions that require habitat functions and values equal to or greater than would be provided under the standard buffer requirement requirements.
1-4.	Wetland hydrology monitoring would occur in locations considered most vulnerable to changes in hydroperiod. These would include gently sloped vegetated areas along the wetland fringe, vegetated areas with a shallow soil interflow zone above bedrock, as well as potential seasonal amphibian breeding pools. Actual monitoring locations and performance criteria would be developed in consultation with applicable regulatory stakeholders, including Ecology. Baseline wetland hydrology monitoring will occur for one year prior to quarry start-up, and will be done concurrent with the hydrologic baseline monitoring that will be conducted as part of the geotechnical investigation associated with stormwater facility design (see also response to Comment 2-13). The 1,700-acre UTF site provides ample opportunities for mitigation, should monitoring results indicate mitigation is appropriate. This includes restoration of wetland and buffer areas disturbed by historical road building, enhancement of existing wetlands disturbed by historical timber harvest activities, as well as construction of new wetland areas. As stated in section 6.5.3 of the EIS, mitigation may also include designation of conservation areas in the vicinity of the mines which would include wetlands, streams, and designated buffer areas. Contingency plans will be included in the final Monitoring Plan and will reflect an adaptive management approach that recognizes that the dynamics of ecological systems change over time in response to natural changes (i.e., changes not related to mine impacts) and are not expected to remain in a steady state. These considerations would be incorporated into the evaluation of any threshold level indicators (i.e., contingency action triggers). The intent of the adaptive monitoring design would be to establish a monitoring assessment that assists in differentiating between naturally occurring variations and those that are attributable to operational activities. This may include measurement and evaluation of a variety of ecological indicators, including:

	• Surface flow contribution to wetlands and reduction in extent of wetland, • Wetland hydroperiod including wetland inundation duration and depths, • Specified percentage change in overland runoff contributions, • Continuous shift in length of established hydroperiod beyond predicted shifts, • Loss of specified percent of obligate wetland species, • Water quality indices including inorganic and organic water quality analysis in tributaries and at discharge locations (wetlands); and • Species composition, occurrence and health at wetland areas and benthic stations. As described in the EIS, consideration of a variety of contingency actions would be triggered if monitoring results show that a site is not meeting performance criteria or permit requirements. The decision process for deciding what contingency actions should be implemented would consider monitoring results, permit requirements, and best available science. Any contingency measure, such as those listed in section 4.5.3 of the EIS, would be implemented in coordination with resource agencies pursuant to the provisions of a Mitigation Plan that would be prepared following confirmation of project related impacts. All monitoring programs proposed for the project are described in Chapter 1, Table 1-4, of the Final EIS.
1-5.	The stream delineation was based on field assessment using Kitsap County Critical Areas Ordinance criteria. The Kitsap County CAO definition is consistent with the State of Washington Hydraulic code rules, Chapter 220-110 WAC, which regulate waters based on "Ordinary high water line" (OHWL). The field assessments conducted for the Wetland and Stream Report reflect these definitions. Figure 2-2 of the Preliminary Drainage Report also shows stream basin locations based on detailed topographic analysis. As shown in that figure, both intermittent streams in question have relatively small contributing areas which further supports conditions observed in the field. Intermittent streams on the site have been reviewed on two occasions by both the WDNR and WDFW. UTF will continue to provide information as requested by regulatory agencies to confirm the extent of intermittent streams on the site.
1-6.	At this time, the project is not expected to trigger the requirement for any federal permits, and therefore, would not be required to submit CZMA certification. If, at some point in the future, it is determined that a federal permit is necessary, a certification of consistency with the Washington State Coastal Zone Management Program would be submitted with the permit application.

FISHERIES DEPARTMENT
360/598-3311
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THE SUQUAMISH TRIBE

P.O. Box 498 Suquamish, Washington 98392

April 6, 2009

Dave Greetham, SEPA Coordinator
Kitsap County Department of Community Development
614 Division Street, MS-36
Port Orchard, WA 98366

Re: Ueland Tree Farm Mineral Resource Development Project
Draft Environmental Impact Statement

Dear Mr. Greetham,

This letter transmits the Suquamish Tribe's (Tribe) comments pertaining to the Ueland Tree Farm Mineral Resource Development Project which is located within the Tribe's Usual and Accustomed (U & A) fishing grounds and stations. The Tribe seeks protection of all treaty-reserved natural resources and cultural resources. The applicant proposes to develop 152 acres for surface mining and associated activities, not including connecting access roads. Development plans also include a concrete batch plant, a railroad spur line, and a topsoil production facility.

2-1 The Tribe has reviewed the information provided and has the following comments. These comments supplement those provided during SEPA scoping effort (letter dated July 25, 2008). Some of the comments below may be similar to those previously provided. In general, the document was difficult to follow and review. It was fragmented and the reader had to skip back and forth throughout trying to piece the information together. Impacts were not clearly stated. The EIS needs to be a stand alone document and have all the required information for review. Referencing the other documents for additional detail is ok.

2-2 This property does not currently have a mineral resource land designation. Has the county done a comprehensive assessment of mineral resources throughout the county (if so please provide copies of these materials to the Tribe)? If an assessment has been completed is it consistent with both county and city planning goals? Is the proposed property an ideal location for mineral extraction (adjacent to the City of Bremerton's UGA)?

2-3 It should be noted that this project will result in significant and permanent impacts to the subject property, associated fish and wildlife habitat, the Dickerson Creek subwatershed

and the character of the surrounding forested area. The property cannot be "restored" or "replaced" after mining activities (despite the many statements in the DEIS contrary to this). The best that can happen is the site will return to a "beneficial use". This is of concern to the Tribe as the Port Blakely UGA property boundary was located so as to avoid, to the extent possible, impacts to Dickerson Creek drainage basin and to protect its significant salmonid populations. Ultimately, the UGA's intrusion into the Dickerson Creek basin was reduced in size from 110 acres to 13 acres, maximizing forest retention and minimizing impervious surfaces. The County, City and Port Blakely were all parties to this agreement. Now, several years later the county is contemplating the permitting of mining and industrial activities in these same areas of concern.

2-3

2-4 Despite the applicant's attempt to avoid direct impacts to wetlands and streams, changes to surface and groundwater flows are likely. The Suquamish Tribe is very concerned about stormwater impacts, increases in impervious surfaces, changes in hydrogeology and reduction and degradation of habitat within the Chico Creek drainage.

As we mentioned in our previous scoping comment letter aquatic resources such as wetlands and streams are subject to disturbances that originate in adjacent upland areas. These disturbances result in changes in the biological, chemical and physical properties of wetlands and streams. Aquatic resources may then be exposed to higher levels of noise, light, temperature, pollutant loading, stormwater runoff, invasive species establishment and human activity. A common method for reducing or eliminating impacts to aquatic resources from adjacent land uses is to maintain adequate buffers *(Wetland and Stream Buffer Size Requirements – A Review*, A. J. Castelle, 1994*)*. Buffers to protect streams from mining activities are generally 200' wide (Application for Reclamation Permit, 23D).

2-5 The DEIS states that wetland buffers for Wetlands 1 and 3 will be impacted by the proposed development. The EIS text does not clearly state the impacts (buffer reductions) or provide sufficient discussion. Figure 6-1 indicates that the buffer for Wetland 3 at some points will be 40'. Literature supports the Tribes belief that buffers less than 50 feet in width are generally ineffective in protecting wetland functions (Wetland Buffers Use and Effectiveness, EPA, February 1992). Wetland 1 has one of the highest ratings for wildlife habitat among the onsite wetlands. The remaining buffer, as proposed, will be inadequate to maintain no net loss of wetland functions.

Wetland buffers reduce adverse impacts to wetland functions from adjacent development. The literature indicates that buffers reduce wetland impacts by moderating the effects of stormwater runoff including stabilizing soil to prevent erosion; filtering suspended solids, nutrients and harmful or toxic substances, and moderating water level fluctuations. Buffers also provide essential habitat for wetland-associated species for use in feeding, roosting, breeding and rearing of young, and cover for safety, mobility, and thermal protection. Buffers reduce the adverse impacts of human disturbance on wetland habitats, including but not limited to, blocking noise and glare. Wetland buffers are essential for wetland protection (Wetland Buffers Use and Effectiveness, EPA, February 1992). All buffer areas should be clearly marked prior to construction/disturbance.

2-6 Whether or not the wetlands onsite contain and support fish, they are hydrologically connected to Chico Creek via tributary stream systems and groundwater (headwater wetlands). Dickerson Creek (upstream of the falls) is designated by the County as a critical contributing area (CCA) for water quality and quantity purposes, as well as for resident cutthroat trout habitat. Chico Creek is one of the largest most productive salmon streams in Kitsap County. Suquamish tribal elders identify Chico Creek as their primary historic source of coho, and chum salmon (C.W. May et al, 2002. Kitsap Peninsula Rufugia Study, Kitsap County). The DEIS states that the wetlands are "separated from other stream systems". Conversely, the DEIS also states that most all (if not all) of the wetlands onsite are associated with stream systems. However, Figure 1-2 appears to show that many of the small tributaries are associated with larger, fish bearing streams (including but not limited to Wildcat Creek, Lost Creek, and Dickerson Creek). The authors of the DEIS minimize the quality and value of the onsite wetlands and their contribution to downstream areas.

2-7 There appears to be a large amount of incidental information and speculation provided in the document. For example, "Wetland and stream buffers are generally narrower under Forest Practices than KCC and logging though some classes of wetlands and smaller streams is allowed. Therefore, it is expected that there could be greater effects on wetlands and streams under the No Action Alternative. Therefore, it is expected that there could be greater effects on wetlands and streams under the No Action Alternative." This statement is erroneous as the applicant plans to return the mined areas to forestry so not only will the area have mining impacts but also forestry impacts. The preferred alternative WILL have additional impacts and to imply otherwise is ridiculous.

2-8 The DEIS states that no candidate species have been documented onsite. Great blue herons and pileated woodpeckers have both been observed onsite.

2-9 Any watercourses onsite that are determined to not be streams need to be verified by WDFW.

2-10 Chico Creek has been historically impacted by development. The stream receives significant stormwater input from existing development in the vicinity. Stormwater runoff is known to increase the frequency and magnitude of peak flows, reduce base flows, as well as increasing erosion, fine sedimentation and bank instability. Any additional surface water generated will exacerbate flooding problems, scouring and stream channel incision. You are already probably aware that increased high-intensity activities within the basin will significantly reduce any potential restoration opportunities in the future.

2-11 The Tribe recommends that the latest approved Ecology stormwater manual be used. The updated manual includes new information and standards that are more protective of the waters in Washington State. Runoff flow control requirements in the updated manual address the problems of both increased peak flow and the duration of high flows which are significant problems in urban streams throughout Washington. Higher levels of

2-11 treatment are required to remove and reduce pollution from runoff to lakes and smaller streams to provide assurance that the treated stormwater runoff is not harmful to fish and other aquatic life and is protective of the environment.

2-12 This area is hydrologically sensitive and complex. There are concerns that the elevation of the quarry floor in mining areas adjacent to wetlands have a lower topographic elevation. What is the depth to seasonally high groundwater vs. quarry floor elevations? What is the annual fluctuation of groundwater? The Tribe is concerned that water may flow laterally above a hardpan layer and potentially drain the wetland. There is also the concern that there is likely a glacial till layer between the advance and recessional outwash layers, resulting in two different aquifers. The recessional outwash typically has higher infiltration rate and potential water yield, but is also more subject to contamination.

2-13 The hydrologic information for this site is going to be largely speculation without the use of both surface and groundwater monitoring wells. Monitoring should occur for at least one year prior to permit approval so that the county has an accurate assessment of existing conditions not just during the period of active mining activity. This baseline monitoring should include information in which to measure potential changes that might occur from the proposed project. This includes, but is not limited to, characterization of both surface and subsurface flow regimes on a monthly basis (avg monthly flow, seasonal low flow, flood frequency, precipitation/infiltration/runoff interrelations, water table elevation and variability, confining layers, seeps, springs, relationship of surface water and groundwater flow, etc.). The EIS states that water quality will be monitored for chemicals of concern. What are they? Monitoring parameters need to be identified and contingency actions should be developed before activity onsite occurs.

2-14 There is conflicting information regarding the fractured basalt. Fractures were identified in all cores. The EIS states that infiltration into fractured basalt is "infeasible" due the to small discontinuous nature of fracturing – and in another area of the report it states that water may transport through "limited" fractures

2-15 Steep slopes above Dickerson, Wildcat and Lost Creeks are a concern. Past logging activities (primarily road construction) have caused mass wasting problems and fine sediment input. Fine sediment has impacted the quality of gravels throughout the headwaters. These demonstrated impacts, current instability and mining activities on these same steep slopes is a concern. Infiltration can also oversaturate hillslopes and cause mass wasting.

2-16 The Tribe is concerned with bringing city water supply onto the subject property. An interest has been expressed by the applicant for a future residential component. Since the area is closed to additional consumptive uses we are concerned that this will promote the use of urban services in a rural area.

2-17 It is recommended that an evaluation be completed prior to permitting each phase of mining activity to ensure that impacts are not occurring and to guide future decisions on subsequent phases of mining activity. The Tribe would like an opportunity to review and comment prior to the permitting of each subsequent phase.

2-18 The Tribe requests the opportunity to review and comment on the reclamation plan. It is difficult to review potential impacts resulting from the project without the reclamation plan information. Backfill is not recommended due to potential contaminants from imported soil. Every load will not be tested for potential contamination. If backfill is necessary the applicant will need specific information regarding source of backfill material, quantity needed (as per the soil budget), stockpile location, grading and compaction scheme, erosion control plan and immediate vegetation plan. In addition, there is concern that the replanting success may be compromised due to very limited amounts of topsoil over glacial till (low nutrient). High nutrient demand trees such as Douglas fir would likely have limited survival.

2-19 The Tribe prefers a modified Reduced Scale alternative. In addition to reducing stormwater impacts and minimizing the amount of impervious surfaces in Dickerson Creek, elimination of the batch plant reduces the potential for contaminant entering fish bearing waters. The Tribe also, prefers elimination of the topsoil facility. Bringing in material from unknown sources is a significant risk to important surface and groundwater resources.

Thank you for the opportunity to comment on the above referenced proposal. We would like the opportunity to provide comment throughout the remainder of the process as new information becomes available. Please keep us informed of project status and any relevant project related actions. If you would like to discuss comments above in further detail please call 360-394-8447. Chico Creek is an important salmon stream to the Suquamish Tribe and we appreciate future efforts to avoid and/or minimize the impacts to the extent possible.

Sincerely,

Alison O'Sullivan
Biologist, Environmental Program

Cc: Richard Robohm, WDOE
Gina Piazza, WDFW
Chris Johnson, DNR

COMMENT LETTER NO. 2 – THE SUQUAMISH TRIBE

2-1.	Comment acknowledged. The intent of the EIS was to incorporate, as much as possible, summaries of the extensive background documentation that has been completed for the project. The objective was to create an overview of the pertinent issues and potential impacts, while still making the technical reports and studies available in the appendices and on the County and UTF websites.
2-2.	The County has not, at this time, conducted a comprehensive assessment of mineral resources throughout the County. Mineral resources are currently mapped where they have been identified through existing extraction sites. The proposed property is being considered by UTF for mineral extraction because of the extent of mineral resources present at the site. The determination of suitability of the site for mineral extraction will be considered by the County as part of the Conditional Use Permit (CUP) process for the proposed site activity.
2-3.	The UTF proposal has been designed to prevent significant unavoidable adverse impacts to the environment wherever possible through application of best available science, best management practices, performance monitoring, and reclamation measures that exceed minimum statutory requirements. This includes avoiding streams and wetlands; designing stormwater facilities pursuant to the Department of Ecology 2005 Stormwater Manual (instead of the 1997 Kitsap County Manual); providing surface water, groundwater and wetland monitoring; and reclaiming the mine sites with habitat features such as forested slopes and wetlands. These project elements are designed to ensure UTF's continued resource-based use of the property consistent with historical usage, while also maintaining habitat value and the forested character of the 1,700 acre site. The UTF proposal is for temporary, natural, resource-based activities on about 90-acres within the Dickerson Creek/Chico Creek basin. This area will be reclaimed to conditions that are similar to, and consistent with, surrounding commercial forests following the completion of mining activities. The UTF proposal is therefore, significantly different in terms of land use and potential impacts than the permanent, high density, urban land uses (mixed commercial, industrial, and residential) that were associated with the Port Blakely property.
2-4.	Comment acknowledged. Refer to response to Comment 2-3
2-5.	The Wetland Delineation Report (available at uelandtreefarm.com) describes in greater detail the analysis and justification for proposed buffer averaging. Also refer to Response to Comment 1-3 above. Although the EIS states that a 40-ft buffer averaging area on Wetland 3 is proposed, the reclamation plan for Quarry A provides for a 50-ft minimum buffer to Wetland 3. This 50-ft minimum buffer represents the actual buffer from Wetland 3 to proposed Quarry A. Figure 6-1 has been revised to more clearly show this.
2-6.	Section 4.2.2 of the EIS (Wetlands) describes wetland hydrology including both depressional wetlands and wetlands that are associated with streams. Wetland function and value is described in the EIS and Wetland Delineation Report consistent with federal, state and County technical guidelines and standards. As previously noted, a number of

	measures have been incorporated to ensure that there are no, or minimal, impacts to wetlands hydrology, and ongoing monitoring will be implemented following construction to allow adaptive management to take place to address impacts, if they occur. Refer to the response to comment 1-4.
2-7.	Comparative information presented in the EIS is provided in order to evaluate potential impacts of alternatives and their severity consistent with SEPA guidelines and regulations. This comparison involves judgments about both the context and intensity of impacts. UTF intends to return the mine area to forestry following site reclamation; however, wetland and stream buffers associated with the mine operation are proposed to be protected in perpetuity and could be included as a project condition should the CUP request be approved. When protected, the buffers would not be harvested as is potentially allowed under Forest Practices regulations. Impacts to wetland buffers under the No Action alternative may therefore be greater than the proposed action in some cases. The EIS also acknowledges that buffer impacts under both the No Action and Proposed Development alternative are expected to be temporary because wetland functions should return to normal over time as the vegetation re-establishes.
2-8.	The text has been revised to reflect this information.
2-9.	Refer to response to Comment 1-5.
2-10.	Comment acknowledged. Chico Creek has, as noted in the comment, been affected by upstream development. The proposed surface water management system on-site is intended to minimize potential impacts associated with the UTF project, and to avoid cumulative impacts associated with other activities in the area. Design of surface water management facilities will reflect current design standards that are consistent with the requirements of Kitsap County and the 2005 Stormwater Manual.
2-11.	The Preliminary Drainage Plan utilized the technical criteria in the 2005 Stormwater Manual for design of stormwater facilities. The final design of the entire mine operation will be prepared to meet requirements and standards under the 2005 Stormwater Manual.
2-12.	<u>Annual Fluctuation of Groundwater</u> The Hydrogeologic Report describes groundwater at the quarry sites as a very shallow "perched" water bearing zone that occurs in the relatively thin layer of topsoil that overlies the very low permeability bedrock. Water that infiltrates through this thin soil layer can only minimally penetrate through the small in-filled cracks and fissures in the bedrock. Based on test pit and boring logs, this perched water would typically exist at depths of between 2 feet to 12 feet below ground surface (bgs) at the quarry sites. Fluctuation in the depth to the seasonally high perched water and annual perched water tables is strongly influenced by topography, but in general would be expected to fluctuate in the range of 6 inches to 18 inches during wet periods, with saturation to the soil surface during periods of intense precipitation. Depth to perched water at the quarry sites is therefore estimated to be in the range of 1 foot to 12 feet bgs, with fluctuations ranging from the soil surface to 10.5 feet bgs, depending on location.

Depth to Seasonally High Water Table vs. Quarry Floor Elevations

The depth to seasonally high groundwater table in relation to the bottom of the quarry sites is shown in Table 1 below.

Table 1 – Summary of Perched Water, Quarry Elevations, and Adjacent Wetlands

Quarry	Soil Depth (ft)	Annual Perched Water Table Fluctuation (ft)	Seasonal High Perched Water Depth (ft)	Finished floor elevation of quarry (ft)	Wetland Hydrogeo-morphic Class	Elevation of wetland (ft)	Distance between quarry and wetland (ft)	Hydrologic divide between quarry and wetland?
A	2' to 5'	0.5' to 1.5'	1' to 3.5'	550'				
Wetland 1					Depressional/ Riverine	625'	100'	yes
Wetland 2					Depressional	645'	80'	yes
Wetland 3					Depressional	640'	50'	yes
Wetland 5					Depressional	645'	80'	yes
Wetland 7					Depressional	645'		
Wetland 9					Depressional	645'	80'	yes
Wetland 12					Depressional	645'	80'	yes
Wetland 17					Depressional	645'	80'	yes
Wetland 19					Depressional	645'	80'	yes
B	2' to 10'	0.5' to 1.5'	1' to 8.5'	550'				
Wetland 1					Depressional/ Riverine	625'	300'	yes
Wetland 8					Depressional	645'	80'	yes
Wetland 11					Depressional	650'	80'	yes
C	2' to 12'	0.5' to 1.5'	1' to 10.5'	700'				
Wetland 6B					Depressional	630'	200'	yes
Wetland 11					Depressional	650'	80'	yes

Lateral Water Flow

The potential for water to flow laterally above hardpan and potentially drain the wetland is a function of wetland location relative to the quarry, wetland hydrogeomorphology, and flow characteristics of the shallow interflow zone. As shown in Table 1, all wetlands adjacent to quarry sites, except Wetland 1, are in the Depressional hydrogeomorphic (HGM) class. These depressional wetlands are located in the shallow soil layer above the basalt bedrock. The hydrogeomorphic classification reflects that interflow above the basalt layer is the primary component of the wetland's hydrology, i.e., they are located in the bottom of a closed depression.

The Hydrogeologic Report states that the shallow interflow zone is the primary component of groundwater flow in the quarry areas, and flow direction in this interflow zone is typically a reflection of surface topography, which also typically reflects the

surface of the basalt formation. The design of the quarry sites reflects the function of this hydrologic system by ensuring that all buffers from the quarries to depressional wetland encompass the entire hydrologic catchment area for the wetland. Because the quarries are located outside of the topographic catchment area of these wetlands, there is virtually no potential for interflow to move laterally above the basalt bedrock to the quarry and thereby potentially drain the wetland.

Wetland 1 hydrology is a function of both interflow (depressional HGM component) and surface run-off (riverine) component. As described in the wetland hydrologic analysis prepared as part of the Wetland Delineation Report, there will be no significant change in the surface hydrology of Wetland 1 due to the proposal. The interflow component will also remain unchanged because the Wetland 1 buffer provides 25-ft or greater vertical separation between the quarry and the wetland. In other words, the quarry is at least 25-ft upgradient from the interflow component of Wetland 1. Therefore, there is no possibility for Wetland 1 interflow to move laterally above the basalt bedrock to the quarry and thereby potentially drain the wetland. Monitoring following site implementation will be used to confirm that no impacts are occurring, and if impacts are detected, adaptive management techniques will be implemented to minimize effects on the wetlands.

Quarry B interflow is in a general southerly direction toward an intermittent stream that is a tributary to Heinz Lake. Quarry B is in a different drainage basin than adjacent Wetlands 1, 8, and 11; so, similar to the wetlands at Quarry A, there is very little possibility for interflow to move laterally above the basalt bedrock to the quarry and thereby potentially drain the wetland. The bottom of Quarry C is located hydrologically upgradient of wetlands so there is no potential for so wetland hydrologic impacts due to quarry excavation. The Hydrogeologic Report provides additional discussion of site hydrogeology, as well as evaluation of potential impacts and mitigation measures. Also refer to the Wetland Delineation and Stream Identification Report and Preliminary Drainage Plan for additional detail on the location of drainage basins, wetlands, and streams on the site.

<u>Potential for Glacial Till Layer Between the Advance and Recessional Outwash</u>

The Hydrogeology Report provides information on subsurface conditions and the relationship between recessional and advance outwash units, and glacial till units observed at the site. As stated in this report, the top of the till unit at Gravel Mine A was encountered at an elevation of approximately 298 feet above mean sea level (msl) in monitoring well EB-1 on the northwest side of Gravel Mine A, but was not encountered in monitoring well EB-2 on the east side of the site which was completed at a lower elevation of 242 feet msl. The till unit was found in exploration pit EP-34, located in the far northeastern portion of the site, at an elevation of approximately 275 feet msl. Borings B-1 and B-2 encountered the till unit at depths of approximately 290-ft msl, respectively.

Water level monitoring showed seasonal high groundwater elevations of approximately 65-foot bgs in EB-1. No groundwater was encountered in piezometers EB-1 and EB-2 or borings B-1 and B-2 during monitoring events. Based on this data, a thin shallow water table develops seasonally in the outwash deposit in areas where it is relatively thick and

	directly overlies the low permeability till unit. The water table associated with the till unit is discontinuous and dips primarily towards the east away from Dickerson Creek. This interpretation is supported by Dickerson Creek seepage surveys in August 2007 and November 2008. Two small groundwater seeps were identified adjacent to Dickerson Creek that are near the proposed Gravel Mine "A" site. These seeps were at the base of the slope and appeared to be associated with basalt rather than till outcroppings. The subsurface investigation of Gravel Mine "B" showed outwash sand and gravel overlaying a silt and till layer that was encountered at depths of between 6-ft to greater than 20-ft below the ground surface. Although groundwater was not observed at any location during the subsurface investigation at Gravel Mine B, it is possible that a thin shallow water table may develop seasonally in the permeable sand and gravel outwash in areas where this unit directly overlies the low permeability till unit. This groundwater, where present, would remain thin even during the rainy season, since it would easily transmit water downslope. The absence of significant groundwater in a shallow water table beneath Gravel Mine B is supported by the results of the 2007 and 2008 Dickerson Creek seepage surveys, which showed no significant seeps from a shallow till layer along the west side of Dickerson Creek adjacent to the proposed Gravel Mine B area. The presence of the till unit at Gravel Mine A does not create concern because the grading plan for the Gravel Mine A site is designed to ensure that the bottom of the mine maintains a minimum 5-ft vertical separation to the observed seasonal high water table elevation. The presence of a till unit at the Gravel Mine B site also does not create concern due to the absence of observed groundwater at this location, the apparent discontinuous nature of the till unit, and the relatively shallow depth of proposed excavation. <u>Potential Contamination of Recessional Outwash.</u> Best management practices for prevention of contamination of the recessional outwash are described in the EIS, Hydrogeologic Report, and Preliminary Drainage Plan. As described in the Monitoring Plan, surface and groundwater monitoring is also proposed to ensure groundwater quality is maintained and protected.
2-13.	Site characterization included over 50 borings and excavation of over 100 test pits. Monitoring has included collection of water level measurements, once in 2000 and twice in 2007, and seepage surveys along Dickerson Creek in 2000, 2007, and 2008. This site characterization and monitoring data provides sufficient information to support evaluation of potential impacts that may be associated with the mine proposal. Refer to the Hydrogeologic Report (available at uelandtreefarm.com) for additional detail on site characterization and monitoring activities. Additional characterization and monitoring will occur as part of the final design process, and would be shared with the Tribe upon request. This characterization and monitoring will follow guidelines of the 2005 Ecology Manual which states that a geotechnical investigation must be conducted to verify infiltration rates, confirm slope stability, and address other geotechnical design information needed to support design of stormwater

	facilities. The geotechnical investigation would include the following elements: Subsurface explorations (test holes or test pits) at each infiltration and detention facility, including representative soil sampling and detailed logs for each test pit or test hole; Soil characterization, including grain-size distribution, textural class, infiltration rate, cation exchange capacity (CEC), and organic matter content for each soil type and strata; Installation of at least three groundwater monitoring wells that are hydraulically connected to surface and ground water features that will establish a three-dimensional relationship for the ground water table; Monitor the seasonal ground water levels at each of the gravel mine sites during at least one wet season prior to final design of stormwater facilities and start up of operations. These baseline monitoring results would be used to determine depth to ground water table and to bedrock/impermeable layers, seasonal variation of ground water table based on well water levels, groundwater flow direction and gradient, and horizontal hydraulic conductivity of the saturated zone; Evaluation of the potential for both unconfined and confined aquifers, or confining units, at the site that may influence the proposed infiltration facility as well as the groundwater gradient; Determine the pre-project ambient ground water quality, as described in the Monitoring Plan; and Post-start up monitoring will also be done for verification of performance as recommended by the 2005 Ecology Manual. All hydrologic monitoring would be addressed in the geotechnical evaluation and Drainage Report that would be prepared as part of final design. Specific chemicals of potential concern are described in the Monitoring Plan provided as Appendix C to the EIS. The Monitoring Plan (section 4) also includes a description of the contingency plan that would be implemented in the event monitoring results are found to exceed applicable standards and/or permit limits. This includes time lines and procedure for coordinating with regulatory agencies and developing action plans that reflect the specific details and circumstances associated with the exceedance event. All monitoring programs proposed for the project are described in Chapter 1, Table 1-4, of the Final EIS.
2-14.	The Hydrogeologic Report (available at uelandtreefarm.com) provides additional information and documentation on basalt characteristics at the site. This report states that the basalt bedrock is massive, and likely extends to several hundred feet below the ground surface in areas identified as potential quarry sites. The bedrock has very low porosity and permeability, limiting the storage and transport of groundwater. Fractures observed in core samples were in-filled with mineralization and/or clay materials. The basalt may therefore transport very small quantities of groundwater through these limited fractures, but the massive basalt formation acts primarily as an aquitard for the more permeable shallow soil materials above. Refer also to Response to Comment 2-12.

2-15.	As shown in the Preliminary Drainage Report, Gravel Mine A has one infiltration pond in the Dickerson Creek basin, which is located more than 200-ft from the top of the Dickerson Creek slope. Gravel Mine B has one infiltration pond in the Dickerson Creek basin, and one infiltration pond is the basin of an intermittent tributary to Dickerson Creek. The Gravel Mine B infiltration pond located in the Dickerson Creek basin is over 400-ft from the top of the Dickerson Creek slope. The Gravel Mine B infiltration pond located in the basin of the tributary to Dickerson Creek basin is separated by over 300-ft of gradual slope (approximately 10 percent) from the intermittent stream. The location of these proposed infiltration ponds meets the requirements of the Kitsap County Stormwater Manual and the 2005 Ecology Stormwater Manual which require setbacks of 200-ft or greater from slopes 30 percent or greater (Kitsap County requirement), and greater than 50-ft from slopes greater than 15 percent (Ecology). Additionally, as part of final design, a geotechnical investigation would be conducted to verify infiltration rates and slope stability. This would include borings/monitoring wells at pond locations to verify depth to water table or impermeable layer; and seepage analysis to confirm there would not be any adverse effects caused by seepage on nearby slopes. Stormwater facilities for proposed quarries would not have mass wasting risks due to lack of significant infiltration and distance to streams. The Quarry A detention facility is separated by 250-ft of gradual slope (approximately 10 percent) from perennial portions of Dickerson Creek. The Quarry C stormwater detention facility that discharges to the Dickerson Creek basin is located over 3,000 ft from perennial portions of Dickerson Creek. Quarry C does not discharge to the Dickerson Creek basin.
2-16.	The current proposal does not include a future residential component. The reclaimed areas will continue forest resource management practices following completion of mining activities. Future residential development, if proposed, would need to conform to existing rural density allowances. Any changes to adopted land use plans and policies, including higher density residential proposals, would require amendment of the County's Comprehensive Plan.
2-17.	Surface water, groundwater, and wetland hydrologic monitoring will be conducted to document project compliance with performance standards and permit conditions. Regulatory agencies also have the authority and ability to inspect the mine operation for compliance with applicable standards. Kitsap County has the authority to require corrective action at any time in the event of noncompliance with permit conditions. The Tribe will have the opportunity to review all permit documentation from the County. The County is open to suggested conditions for information sharing.
2-18.	Preliminary reclamation plans have been submitted as part of the CUP application and are available for viewing at www.uelandtreefarm.com. Backfill would come from a combination of on-site and off-site sources. As shown in Table 1-1 of the EIS, approximately 764,000 cubic yards of overburden is associated with the quarry areas. As overburden is removed from one area of the quarry, it will be used as reclamation backfill in another. As such, this on-site overburden will constitute the majority of backfill at the site. Generators of imported soil that are used for backfill at

	the site would be required to provide evidence the imported fill is clean fill material. This would consist of completing a Clean Soil Contract (or similar) that certifies the material contains no contamination as defined in applicable federal, state and local code; no construction, demolition, wood waste, concrete, asphalt, rubbish or similar; and/or no soil from a cleanup action (i.e., problem waste). Reclamation measures used to ensure acceptable plant success will be provided in the final reclamation plans and will include top soil and sub-soil placement, fertilization, and invasive plant control.
2-19.	Comment acknowledged.

To David Greetham,

Environment Planner, Dept of Community Development
619 Division Street MS-36
Port Orchard, WA 98366-4682

Dgreetha@co.kitsap.wa.us

David, and any and all interested parties to the Ueland Tree Farm proposed Gravel Pit, Basalt Mine, and Concrete Batch Plant;

I would like to submit the following concerns as issues for consideration, regarding the proposed Ueland Tree Farm LLC gravel pit and basalt mine.

My concerns are outlined as follows:

1)Traffic:

Note- The impact is on more intersections than mentioned in EIS-

"9.2.3 TRAFFIC OPERATIONS
Traffic analyses were conducted to identify deficiencies in existing operating conditions for the unsignalized Lebers Lane/Grover Lane/Northlake Way intersection.
Levels of service are quantitative measures that grade the operating conditions a driver will experience while traveling through
a particular intersection during a specific time interval."

3-1 ***The EIS only mentions Lebers and Northlake Way intersections as the only impacted. However, there are two others, one I see to be EXTREMELY HAZARDOUS. They are the Chico Way and Northlake Way intersection, and the Northlake Seabeck triangle.**

The triangle is currently a hazardous intersection to to limited site distance. My concern, (which I mentioned in a letter dated June 23, 2008,) is that double trailers will be coming back towards the Ueland site, and cars coming around that corner will face a hazard. In addition the local truck driving school is current utilizing this route as well.

Q- 1
What will be done to improve this situation/intersetion for safety?

***The first news reports said an additional 4 trucks per hour, then 156, then 186.**

Q-2
Why does it change each time?

Q-3
How do we know the number of traffic trips will not be changing in the future?

3-2 Q-4
Can the southern route be studied further and addressed in writing?

Q-5
Can the speed limit be reduced to 25MPH on Northlake and the lower Seabeck Highway?

Q-6
Is it time for a stop light at the Triangle?

*** The project proponent will widen Northlake Way, and provide a center turn lane and a center acceleration/merge lane for left turns.**

Q-7
How far down with this lane extend?

3-3 Q-8
How wide is the proposed lane?

Q- 9
How will Ueland Tree Farm acquire the property to do the projected improvements? There is limited space (as mentioned in the Kitsap Lake Neighborhood Association comments dated July 23, 1008)?

***The Kitsap Lake Neighborhood Association also commented on July 23 about the narrow roads for Northlake Way, Chico Way, and Kitsap Way.**

Q-10
I did not see the narrowness of these roads addressed in the EIS except for Lebers
3-4 Lane/Northlake intersection. Why?

*Port Blakely was studying 6 routes to and from the property to include an impact study with the routes.

Q-11
What was the result? Where can those studies be seen?

*** Bremerton city reportedly was said to say "no" as to an exit out of the Gorst area, as mentioned at a public meeting.**

3-5 Q-12
Because Bremerton gets its water supply from the Union Watershed, is it possible to revisit this?

*** The EIS stated that for the direction of traffic, the preferred route has less passenger vehicle traffic**.

Q-13
With this in mind, why would it be permissible to allow increased industrial traffic in an
3-6 admittedly less traffic area?

Q-14
Why allow this kind of traffic in a residential Zoned area?

Q15-
Does this change the traffic Zoning in this area? Or property zoning?

*** The turn lane proposed begins in a sight limited corner of Northlake Way. Traffic coming from the North end/Kitsap Way area would be impacted.**

3-7

Q-16
How does the county and Ueland Tree Farm propose to ensure this is not a hazard

EIS- "9.4 IMPACTS OF ALTERNATIVES
The volume of traffic expected to be generated by this project is below the number of trips for which Kitsap County requires off-site analysis. Because of this, off-site intersections were not analyzed. The Lebers Lane/Grover Lane/North Lake Way intersection is the only intersection expected to be directly impacted by the proposed project."

Q-16
3-8 I need to see a further definition of "directly impacted".

Q-17
Where can I find this definition?

Q18
What is the requirement for off site analysis?

EIS-"For this analysis, the directional distribution of traffic to and from the proposed project was estimated based on the routes to market for the items that would be produced by the proposed facility. Much of the traffic generated by the site will use SR-3 to bring the products to their ultimate destination. "

3-9

Q-19
Why would an industrial project prefer a residential thoroughfare?

Q-20
How can this conflict between residential zoning and industrial use be avoided?

"EIS-The amount of traffic expected on the roadway, even with the conservative trip generation assumptions, is well below the capacity of the roadway, and much lower than the County plans for on typical residential roadways. The expected volumes are such that an access road will qualify as a "Very Low Volume"
roadway under County standards. However, in recognition that the percentage of trucks will be higher
3-10 than typically expected on a residential street, UTF will improve the geometry of the roadway to provide increased sight distance, stopping sight distance, turning radii, improved pavement design, sidewalks for pedestrians, and increased shoulder width."

Q-21
This improvement appears to be primarily within their property. What about the surrounding, and equally impacted area?

EIS-
"Alternate Access Evaluations
The document, *Kitsap Lake Light Industrial Park – Access Study* (*Access Study*)(Parametrix, 1999), provided analysis of potential access options for a 440-acre mixed-use development adjacent to the UTF property. The Access Study identified six alternatives for access to the northern portion of the property,
3-11 and two access options were considered for the south end of the property. The evaluation concluded that the access alternative that used Lebers Lane was the most cost-effective. The analysis did, however, note that the feasibility of this option was constrained by the sharp corner connection to North Lake Way. This conclusion was influenced by the high traffic volumes and road capacity associated with the proposed mixed-use development. The most conservative PM peak hour and average daily project traffic from the 440-acre proposal was 1,800 and 12,950, respectively. This was substantially higher than the 35 PM peak hour and 186 average daily trips forecast for the current UTF proposal.

Other north access alternatives considered in the *Access Study* would have required acquisition of at least seven additional properties, and construction of a new roadway through an established residential area. "This would have had greater impact than the proposed Lebers Lane access due to direct displacement, construction impacts, and operations (noise, air, aesthetics and safety). Costs to construct these other access options were prohibitive to the UTF project. Impacts associated with south access options are even higher; including construction of over 7,000 feet of new road and acquiring right-of-way on up to 19 Properties."

3-11 "The UTF proposal has significantly lower traffic volumes (less than 2%) compared to those used for the *Access Study*. The UTF proposal also has feasible road improvements that address access to Northlake Way, and UTF owns 100 percent of the property adjacent to Lebers Lane. These factors would effectively mitigate potential impacts associated with the proposed access road. Further consideration of other access options, which have both higher impact and higher cost, are therefore not warranted."

Q-22
Property to be purchased should not be a consideration to the county because, Lebers property was purchased prior to the final approval of the project.
As a result, shouldn't the project do further study to include a comprehensive study of using their own existing property to connect with an industrial ingress/egress route?

2)There are more districts than mentioned the EIS- Schools, pedestrian and bicycle traffic:

EIS "9.2.5 SCHOOL BUS SERVICE

The Central Kitsap School District operates school bus service on Northlake Way, and provides a school bus stop at the intersection of Northlake Way and Lebers Lane NW with the following service times: *not listed

3-12 **The following should be included school bus stops impacted by the projected project: *not mentioned**

The Central Kitsap School District estimates that approximately 5 to10 students use this stop. "

The EIS mentions one school district impacted by the increased traffic on Northlake Way. However, in my letter on June 23, 2008, I mentioned and brought to attention, that TWO districts are served on Northlake Way.

Q-23
Why was this ignored?

The combined School Districts serve 59 children on the ingress /egress route of the projected project. (as per the Bremerton and CK District Transportation offices)

There are 92 bus stops per day on the Northlake Way and Chico Way route. Children will be on the narrow roadside, in the dark, next to dump trucks.

3-13 Q-24
How will these children be safe next to dump trucks passing them?

EIS "School Bus Service
The planned roadway improvements along Lebers Lane, Grover Lane, and on North Lake Way would enhance the pedestrian walk routes from local area residences to the existing school bus stop on North Lake Way. A sidewalk is proposed to be constructed along Lebers Lane. Grover Lane and North

- **"The project proponent will provide pedestrian facilities, including sidewalks and curb ramps along**

Northlake Way."

"The project proponent will complete the pedestrian connection on Lebers Lane to Northlake Way."

• The project proponent will provide a sidewalk along one side of Lebers Lane, and will improve sight distance, stopping distance, turning radii, and increased shoulder width."

*** Proponent offers to do improvements, yet they benefit the proponent primarily, in that it does not extend further down the route of ingress /egress.**

Q-25
What will be done to ensure the safety of the current foot/bike traffic on the rest of the southern route on Northlake Way? Chico Way?

3-13

***I contacted both the Central Kitsap School District and the Bremerton School District. They both gave me the amount of children served on Northlake Way.**

The amount of children standing on the side of the road is: 59

The amount of total bus stops on the path of the proposed trucks are: 92

Whether this amount is "considered" to be substantial or not, it is clearly a situation that should require attention.

We, the citizens of Kitsap and Bremerton should not put any child in a harmful situation knowingly.

In addition, a LARGE commercial Daycare is on Chico Way, as well as a private school.

3-14

Q-26
How will traffic impact them? Has there been a study on this specific area?

Note- I have sent an attatchment, to be attached to this letter, with the bus stops for both districts that will have children on the roadside ,with truck increased traffic proposed by Ueland Tree Farm.

Q- 27
How does the city, county, and Ueland propose to increase and ensure their safety?

Q- 28
Can there better lighting throughout the route for school children, and pedestrian safety?

3-13
(Continued from above)

Q-29
Should a Wider walking path/shoulder width down the entire route, and not just Lebers lane be a better safety improvement solution?

Q- 30
Should lighted crosswalks be put in ?

Q- 31
Should Bus shelters be put in along Northlake Way and Chico Way?

Q-32
Should Curbs be down Northlake Way and Chico Way?

3-13

Q-33
Would the avoidance of the large dump trucks during the school bus routing be a possible alternative?

EIS "9.2.6 BICYCLE AND PEDESTRIAN FACILITIES
There are currently no designated bicycle or pedestrian facilities within the project area."

This would mean that the increased traffic would potentially be more hazardous, as a result of there being no adequate facilities for the current usage of bicycle and pedestrians. Dump truck traffic in a residential area should not be taken lightly.

3-15

Q-34
What study has been done about the width of the road in proximity to pedestrian and Large vehicle traffic?

EIS "**Bicycle and Pedestrian Facilities**
The planned roadway improvements along Lebers Lane, Grover Lane, and on Northlake Way would enhance the pedestrian and bicycle facilities in the local area, as described above for School Bus Service."

3-16

Q-35
How specifically does their plan benefit Northlake Way as a whole, and not in part with Lebers Lane?

Also note that Kitsap Transit has 4 bus stops on this route.

5)Gravel not fully addressed on Northlake Way and Chico Way:

EIS-"Nuisance Gravel
Mining operations can result in dirt and gravel being tracked out of the facilities by trucks carrying materials away from the site. Some of this material can include loose gravel that can be kicked up by tires or can fall from a moving truck and cause vehicle damage.
The UTF operation will include a paved road from the Gravel Mine A site to Lebers Lane, which would reduce track-out. The facility will also include provisions for a wheel wash (if needed) and drivers will be required to inspect their loads before leaving the site. Periodic cleaning of Lebers Lane will also be conducted, if needed to remove any track-out from the site. Other measures to reduce nuisance gravel are outlined in the Mitigation Measures section."

3-17

Q-36
Ueland mentions in their study, and the EIS states, that Ueland Tree Farm intends to do a truck wash, and do cleaning of Leber's lane. This area of residences is owned by Ueland Tree Farm.

I would like to see periodic cleaning responsibility of Northlake and Chico Way route as well, due to the fact that they would also potentially be affected. This could affect the safety of vehicles, pedestrians, bicyclists, and motorcyclists. In addition, complaints to the county could impact the county financially, due to increased cleaning of these areas.

Q-37
How would Ueland be able to implement periodic cleaning on Northlake Way and Chico Way?

Q-38
Could concerned citizens call the Gravel Business, and action be taken? Would there be a time frame for a cleaning action due to a spill or debris?

3-17

Q-39
Can a cleaning program be implemented to ensure that gravel debris is delt with on these above mentioned roads?

8 of 13

6)Wetland monitoring done by proponent and not an outside, non -interested party:

I read with great interest how the wetlands and watershed monitoring would be contracted out, or monitored by Ueland themselves.

3-18

Q-40
Would the tribes or DNRS, or environmental agencies, be better suited to be impartial?

Q-41
How can we be assured that there is no conflict of interest ?

7

7) The EIS states "Concrete batch plant operations may create nuisance noise and dust for surrounding residences, and Salmon habitat. Damage to streams may be negligible," yet, Chico Creek is "one of the states most pristine water sheds." and of the states most sustainable salmon runs.

In addition the EIS states: "The Site development **will** create dust, noise and traffic impacts for surrounding residents, but the impacts are not expected to be significant."

3-19

In my opinion The EIS does not state specifically, what constitutes significant vs. non significant on dust, and traffic.

Q-41
Can something more specific, in writing, be printed, in answer to this question, to give a better baseline understanding? (For example 50 cars per day would not be significant in traffic studies, however any increase after 499 would be considered significant?)

Q-42
Should we to gamble with the chemicals and dust settlements that the EIS states will be present and used in the greater Chico Creek vicinity?

9 of 13

8) Air quality:

3-20

The application of fertilizers and herbicides is mentioned at several points in the EIS

Q-43
What specifically would or could potentially be used?

Q-44
3-20 How do the above chemicals affect animal habitat, water quality, erosion, and environment?

Q-45
Is there a natural alternative to any and all proposed chemicals to be utilized on the site?

Q-46
How far do dust particulates travel?

Q-47
Could dust travel into and around the protected areas of the Chico Creek?

3-21

Q-48
How could this dust from the proposed site construction and operation, potentially affect the salmon habitat safety?

Q-49
Could any of the dust or chemicals used be harmful to human or animal populations in any extent?

The EIS did not clarify what would constitute significant vs. non significant impact with regard to dust issues.

3-22

EIS- "The Proposed Development Alternative will result in impacts to surface and ground water, vegetation and habitat, air quality, noise, land use, recreation and aesthetics."

9) Community notification process:

I have serious concerns about the lack of community notification for the residents in the surrounding vicinity of Ueland Tree Farms Mining Project, Gravel Pit, and Concrete Batch Plant. (10 of 13)

Community Newspapers have not seemed to be entirely effective in letting the homeowners and residents in on what is potentially going to affect their neighborhoods.

3-23

Recently, a grassroots campaign has been launched to increase awareness. As a result, many more community members were present at the last meeting.

Q-51
How does Ueland plan to increase additional awareness to their proposed project within the residents of the surrounding areas?

Q- 52
What can the county do to ensure that the potentially citizens are properly notified regarding this large commercial project?

Some residents may be elderly, disabled, or homebound, and may not have internet access, or newpaper delivery.

Q-53
How can those people be made aware of the upcoming project and the impact it may have on them?

3-23

Q-54
Can mass mailings be done in the Kitsap Lake, Northlake Way, Chico Way to hwy 3, and lower Seabeck highway areas?

12) Community Access:

I have heard mixed discussion about what kind of trail access the community can continue to expect.
This property had previously been owned by the same company since the 1880's.

3-24

Q-56
How does Ueland Tree Farm propose to ensure continued community enjoyment of the forest, trails, and area, if any?

Q-57
What guarantees are there that the property will be accessible to the community for lawful usage and enjoyment?

11) EIS Study:

The Environmental Impact Study almost mimics the Ueland Tree Farms independent study.

3-25

Q-58
What specific process was utilized by the county to do their own study of this project?

In closing:

It appears that the owner of Ueland Tree Farm, Craig Ueland, and his project manager, Mark Mauren are interested in maintaining good community relations. In addition, they are trying to account for the potential impacts to the surrounding areas.

However, as many realize, this is an environmentally sensitive area, that neighbors a rural residential road and zoning designation.
In the EIS, and Uleland's own studies, they acknowledge that this project will result in impacts to surface and ground water, vegetation and habitat, air quality noise, land use, recreation, traffic and aesthetics.

It is crucial that ALL potential impacts be discussed and lessened, when and if avoidable.

I look forward to hearing the answers to these, and many more questions.

Respectfully,

Kim Adair

Homeowner- Northlake Way

.
The final page is left blank intentionally.

CENTRAL KITSAP SCHOOL DISTRICT

CENTRAL KITSAP HIGH BUS

Bus
83

CHICO WAY/DILLON RD	7:10 2:57
3281 NORTHLAKE WAY	2:58
3351 NORTHLAKE WAY	7:11
NRTHLAKE WY/TAYLOR	7:11 2:59
NRTHLAKE WAY/DAVID	7:12 3:00
NRTHLAKE WY/LEBERS	7:12 3:01

Bus
60

ERLANDS PT/FRWY APT	7:31 2:54
4012 CHICO WAY	7:32 2:53

Bus
83

CHICO WAY/DILLON RD	7:10 2:57
3281 NORTHLAKE WAY	2:58
3351 NORTHLAKE WAY	7:11
NRTHLAKE WY/TAYLOR	7:11 2:59
NRTHLAKE WAY/DAVID	7:12 3:00
NRTHLAKE WY/LEBERS	7:12 3:01

CK JUNIOR HIGH SCHOOL BUS

Bus
60

4012 CHICO WAY	6:23 2:19
ERLANDS/FAIRWY APTS	6:24 2:20
CHICO WY/SUB PROPNE	6:40 2:32
3351 NORTHLAKE WAY	2:33
3230 NORTHLAKE WAY	6:41
2950 NORTHLAKE WAY	6:42 2:33

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NORTHLAKE/TAYLOR	6:42 2:34
NORTHLAKE/DAVID	6:43 2:34
NORTHLAKE/LEBERS	6:44 2:34

Bus
83 Pass thu from Country Lane to CK Jr. no stops on Chico?

Klahowya BUS

Bus passes through to Sawmill
54

OLD SWMILL/SEBCK HY	6:36 2:27

Jackson Park Elementary School

Bus
62

3670 CHICO WAY	7:38 3:07
NORTHLAKE/TAYLOR	8:00 3:09
NORTHLAKE/DAVID	8:01 3:09
NORTHLAKE/LEBERS	8:01 3:10

Bus
54

3057 NORTHLAKE WAY	7:59 2:50
3230 NORTHLAKE WAY	8:02 2:50
3357 NORTHLAKE WAY	8:04 2:49

(this bus travels up to Sawmill and back to Jackson Park)

Silverdale Elementary School

Bus passes through

50

4024 COUNTRY LN 8:29 4:01
3953 COUNTRY LN 8:32 4:03
4964 CHICO WAY 8:41 3:52

Bus Arrival

60

4205 CHICO WAY	8:30 3:48
3523 CHICO WAY	8:32 3:49
CHICO WY/GOLF CLUB	8:34 3:50
CHICO WAY/GULBERG	3:55
3670 CHICO WAY	8:40 3:54

BREMERTON SCHOOL DISTRICT

Kitsap Lake Elementary-

ROUTE J

AM PM WED
8:35 4:15 2:10 Chico Day Care
8:37 4:18 2:12 Chico Way & Wedgewood
8:38 4:19 2:13 Northlake Way & Taylor Rd
8:39 4:20 2:15 Northlake Way & David Dr
8:40 4:21 2:16 Northlake Way & Lebers Ln

Mountain View Middle School

ROUTE Q

AM PM Wed
7:18 3:08 1:01 2216 Northlake Way
7:19 3:09 1:02 Northlake Way & David Dr
7:20 3:10 1:03 Northlake Way & Taylor Rd

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Bremerton High School

ROUTE X

6:44 2:40 12:40 2216 Northlake Way
6:45 2:41 12:41 Northlake Way & David Dr.
6:46 2:42 12:42 Northlake Way & Taylor Rd.

COMMENT LETTER NO. 3 – KIM ADAIR

3-1.	Site distance at the Northlake Way and Seabeck Highway intersection is most limited for the south bound stop controlled leg of Northlake Way; other legs of the intersection that will be used by the project clearly exceed site distance requirements. Kitsap County Road Standards provide guidance on site distance for County roads. Seabeck Highway east of the railroad crossing has a posted speed limit of 35 mph. For a design speed of 45 mph (10 mph over the posted speed limit), a crossing of a major arterial from a minor approach needs a minimum 360-ft of site distance, with adjustment up or down depending on road grades. This distance decreases to 335-ft for a 35 mph design speed (25 mph posted speed). Based on available mapping information, there is currently between 350 and 400-ft of site distance for the north bound stop controlled leg of the Northlake Way-Seabeck Highway intersection, which is within the acceptable range of Kitsap County Road Standards. Potential visibility obstructions at this location consist of shrub and small trees within the right-of-way.
3-2.	The number of vehicle trips described in Table 9-2 of the EIS represents the high end of the range of estimated total trips (in and out) at full build out, including both employee and truck traffic. Previous truck trip estimates discussed during the early stages of project development referred to combined trips during "typical" conditions (4 trucks per hour), and/or total number of truck trips at full build out, not including employee vehicles (156 trips). The number of trips shown in Table 9-2 represents the worst-case scenario for the environmental evaluation, and as such, is not expected to be exceeded. In response to comments received on the EIS, an access feasibility study was performed to evaluate the advantages and disadvantages of a south access route to the UTF site. The analysis looked at two possible options for south access road alignments and evaluated the length and grade (steepness) of roadway required, total number of properties that would have to be purchased, what stormdrain facilities would be required, other environmental concerns, and total cost. While the approach to the south access road options along Werner Road has certain advantages over the north access, such as freeway proximity and areas of existing industrial zoned land, both of the south access road options would adversely impact the overall environment to a larger extent than the north access road due to the steep slopes in the area, stream and wetland crossings, and drainage constraints. The study therefore concluded that the overall environmental impact and cost of a south access road would be far greater than that of a north access road and as such was not carried forward as an alternative in the DEIS or FEIS. The *Ueland Tree Farm Mineral Resources Development Access Feasibility Analysis* (May 2009) is available at www.uelandtreefarm.com for further evaluation of this issue. Speed limit reductions are typically initiated by the agency responsible for managing the road (Kitsap County Public Works in this case) in response to geometric concerns, capacity and/or safety issues. The County may elect to reduce the speed limit on Northlake Way if capacity or safety issues are identified in the future. Signals are typically considered when traffic volumes result in unacceptable delays, there are a high

	number of accidents, or there is high pedestrian volume (such as a school crossing). Traffic delays at the Seabeck Highway-Northlake Way intersection are relatively low and do not warrant signal installation.
3-3.	Road width is discussed in the Traffic Report with respect to improvements near Lebers Lane. The existing Northlake Way road between Lebers Lane and Chico Way typically varies in width from approximately 30-ft to 41-ft with two 11 to 12-ft travel lanes, with shoulders that range from less then 3-ft to over 6-ft wide. Kitsap County Road Standards for new minor arterials are based on Design Hourly Values (DHV), which can generally be considered to be in the range of 10 percent of Average Daily Traffic (ADT). The Northlake Way ADT, in October 2007, was measured at an average of 6,187 vehicles, which corresponds to an approximate DHV of 600. For arterials that have a DHV greater than 201, Kitsap County Road Standards require 12-ft lanes and 8-ft shoulders for total width of 40-ft. As shown in the Traffic Report, Northlake Way will be widened to a 40-ft width for a 600-ft segment on each side of Lebers Lane (total of 1,200-ft). The remaining portions of Northlake Way are designated a Minor Arterial; the proposed use is consistent with this designation. All roadway modifications will occur within the existing County road right-of-way, or on property owned by UTF. The Traffic Report can be viewed at www.uelandtreefarm.com.
3-4.	See also response to Comment 3-2. The Port Blakely access study was a preliminary assessment of potential routes to their proposed commercial/mixed-use development. This report can be obtained from Kitsap County. The report, entitled *Kitsap Lake Light Industrial Park – Access Study* (Parametrix 2000), provided preliminary analysis of potential access options for a 440-acre mixed-use development adjacent to the UTF property. The Access Study identified six alternatives for access to the northern portion of the property, and two access options were considered for the south end of the property. The evaluation concluded that the access alternative that used Lebers Lane was the most cost-effective.
3-5.	The City of Bremerton has reiterated that access will not be allowed through the City watershed land near Gorst (Phil Williams, personal communication, June 24, 2009). Such areas are to remain restricted access for watershed protection purposes.
3-6.	Low traffic volumes typically indicate that a road has capacity available for additional traffic. As described in Section 9.4.2 of the EIS, the amount of traffic expected on Lebers Lane, even with the worst-case trip generation assumptions made in the report, is well below the capacity of the roadway, and much lower than the County plans for on typical residential roadways. However, in recognition that the project would increase truck traffic on a residential street, UTF will improve the geometry of the roadway to provide increased sight distance, stopping sight distance, turning radii, improved pavement design, sidewalks for pedestrians, and increased shoulder width. All of these proposed improvements would improve safety on the roadway. Allowing truck traffic on Northlake Way is consistent with the road's designation by Kitsap County as a Minor Arterial, which is defined in the Kitsap County Comprehensive Plan (2006) as follows: "Minor Arterials provide access to the principal arterials and the freeway systems. They provide primary access to or through communities of high density

	residential, commercial/retail, or industrial land areas. Trip length generally exceeds five miles. Minor arterials provide routes for public transit systems between major communities within the county." Existing truck traffic (three axles and greater) in mid-October 2007 on Northlake Way at Seabeck Highway averaged 106 vehicles per day between the hours of 6 AM and 6 PM, with the majority of truck traffic occurring between 7 AM and 4 PM. The proposed use of Northlake Way is consistent with the road's designation and existing use. As described in Section 8.2.1 of the EIS, the UTF property has Kitsap County land use and zoning designations of Rural Wooded (RW) and Forest Resource Lands (FRL). The area in the vicinity of the access road is zoned Rural Resource (RR). Mineral extraction is an allowed use in all of these zones with a CUP. The UTF site has been used for resource purposes for over 100 years. Mineral resource development is consistent and compatible with past and continued natural resource based practices. Traffic and property zoning in the area would be unchanged by the proposal.
3-7.	Sight distance at the intersection of Northlake Way and Lebers Lane will be mitigated by construction of a left turn lane off of Northlake Way, as well as a center acceleration/merge lane for left turns entering Northlake Way (refer to Figure 9-3 of the DEIS). The proposed improvements would result in a wider roadway near the intersection, with holding areas for turning traffic. Design details are provided in the Traffic Report. See also response to response to Comment 3-3.
3-8.	The term "directly impacted" as used in the Traffic Report, refers to impacts that exceed regulatory standards that result primarily from the proposal. This definition is commonly used in engineering analyses and reports. The Kitsap County threshold for off-site traffic analysis is 50 peak hour trips. Due to the relatively low volume of traffic expected to be generated by the project (35 total peak hour trips), and because the trip generation from the project is below the number of trips for which the County required off-site analysis (50 total peak hour trips), off site intersections were not analyzed.
3-9.	Industrial traffic is consistent with the Northlake Way Minor Arterial designation. See also response to Comment 3-6.
3-10.	Road modifications on Lebers Lane and at the intersection with Northlake Way are needed because these areas do not currently meet road standards for proposed truck use, and truck use on Lebers Lane would occur as a result of the proposal. Other portions of the local road system that would be used by the project are currently being used by trucks (see response to Comment 3-6) and provide adequate lane width, grade, and site distance. Traffic from the proposal will be a relatively large portion of the daily traffic on Lebers Lane, and only a small portion (about 3 percent) of the total traffic on Northlake Way.
3-11.	While the applicant voluntarily purchased land in the vicinity of Lebers Lane, Kitsap County can not require the applicant to purchase the land that would be required for a south access road. UTF has comprehensively evaluated all feasible options for site access. Refer to the responses to Comments 3-2 and 3-4.
3-12.	The Bremerton School District (BSD) was unintentionally omitted from the discussion in Section 9.2.5 of the EIS. In addition to the Central Kitsap School District bus routes

	mentioned in the EIS, BSD school bus Route J, for Kitsap Lake Elementary, operates a bus stop at the intersection of Lebers Lane and Northlake Way (refer to Figure 9-3 of the DEIS). Pickup and drop-off times for this bus stop are 8:40 AM and 4:21 PM, respectively. There are three stops on Northlake Way in the vicinity of the project for Bremerton High School, at Taylor Road, David Road, and at a private residence approximately 350 feet north of the intersection of Lebers Lane and Northlake Way. The EIS text has been revised to reflect this information.
3-13.	Based on bus route information from the Central Kitsap and Bremerton School Districts, there are nine school bus stops on Northlake Way between Lebers Lane and Chico Way. The National School Transportation Specifications and Procedures Manual, 2005 Revised Edition (adopted by the 14th National Congress on School Transportation) provides guidance on evaluation of school bus route potential fixed driving hazards. These hazards include visibility obstructions, inadequate shoulder width, proximity to intersections and presence of warning signs. A preliminary review of the school bus stops along Northlake Way shows that sight distance appears adequate and shoulder waiting areas are present. To provide additional safety, UTF would construct a designated school bus waiting area and shelter at the intersection of Lebers Lane and Northlake Way, which will be paved and covered, and will provide a minimum 8-ft separation from the travel lane (assuming adequate right-of-way is available and there are no critical area conflicts). Pedestrian warning signs will also be placed on each side of Northlake Way at this location. Bus stop details and design would be provided as part of the Site Development Activity Permit application. Avoiding truck traffic during bus routing would not be feasible due to the need to maintain truck traffic during working hours. Truck traffic is required to adhere to traffic regulations similar to other vehicles. This includes obeying speed limits, and yielding to school buses and pedestrians. A Truck Driver Notice sign will also be posted on Lebers Lane prior to the railroad crossing to notify truck drivers of the need for safety and attention as they pass through areas where pedestrians and bicyclists may be present.
3-14.	The Day Care and private school are located in an area with designated cross walks and a 20 mph reduced speed limit. Chico Way has adequate width and visibility at this location and currently supports significant vehicle and truck traffic. The project is therefore not expected to result in additional impacts, due primarily to the minimal increase in background (existing) traffic levels.
3-15.	Refer to response to Comment 3-3
3-16.	The existing roadway conditions and facilities and volumes of truck traffic pose dangers to pedestrians and bicyclists using Lebers Lane, Grover Lane, and Northlake Way. The roadway and facility improvements proposed as part of the Mineral Resource Development Project would represent an improvement over the current safety conditions in the area.
3-17.	Track out of dirt and debris onto Northlake Way is expected to be minimal due to the proposed wheel wash and periodic road cleaning of Lebers Lane. Track out of dirt onto Chico Way is even less likely due to the distance between the site and Chico Way. Track out control will be accomplished by prevention (wheel wash and paved access road), as

	well as road cleaning on an "as needed" basis using a mechanical street sweeper, which is a common best management practice in the sand and gravel industry. Gravel debris will be controlled by careful loading of trucks, paving the access road (which tends to reduce gravel entrainment in tire treads) and requiring truck drivers to inspect their vehicles for loose gravel prior to leaving the site. Trucks using the site will be identified with operator name and address, consistent with industry standards so that nuisance gravel sources can be effectively identified. Typical practice within the industry is for the site operator to compensate vehicle owners for damage when the vehicle owner can demonstrate to a reasonable degree that the source of the gravel is the operator's vehicle.
3-18.	Monitoring is typically performed by a qualified third party that is mutually agreeable to both the property owner and regulatory agencies. Monitoring and reporting is conducted in accordance with approved monitoring plans that include specific performance criteria and standards and reporting requirement. These specific performance criteria and standards, and use of a qualified third party for monitoring, assure no conflict of interest in gathering data and presenting monitoring results. The Kitsap County Critical Areas Ordinance clearly defines the necessary qualifications for a wetlands specialist (KCC 19.150.715). All monitoring programs proposed for the project are described in Chapter 1, Table 1-4, of the Final EIS.
3-19.	"Significant," as used in the EIS, means a reasonable likelihood of more than a moderate adverse impact on environmental quality. Significance involves context and intensity (WAC 197-11-330), and does not lend itself to a formula or quantifiable test. The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The purpose of the EIS is to evaluate potential impacts and their severity, which is weighed along with the likelihood of its occurrence. The DEIS and FEIS provide the context and process for determining whether a proposal is likely to have a significant adverse environmental impact. As long as the project complies with all local and federal air quality standards and requirements, no significant air quality impact would be expected. The Puget Sound Clean Air Agency (PSCAA) is the air quality regulatory agency in this area and will review and approve all air quality permits for the proposal to ensure that all air quality standards would be met. Significant traffic impacts are typically described in terms of level of service deficiencies (i.e., delays) and/or roadway geometric deficiencies (i.e., turning radius, width, site distance, etc.). Also refer to Response to Comments 3-1, 3-2, 3-3 and 3-6.
3-20.	Ueland Tree Farm has made it a practice of treating competing vegetation in plantations by hand as well as mechanically brushing the roads instead of using chemicals. In the future it is the intent of UTF to continue that practice. Given the limited size of harvest units (less then 30 acres) and year round logging capability, UTF does not see the need to water roads in order to keep dust down during harvest operations. The use of fertilizers is not economical due to the small size of the tree farm and the productivity of the ground. Any chemical use will be confined to the mining operation.
3-21.	The vast majority of fugitive dust caused by mining activities is made up of relatively large particles that cannot be held for long periods in atmospheric suspension. These large particles fall out of suspension quickly and return to the ground surface. However, a

	small percentage of the dust is comprised of smaller particles that have the potential to remain suspended in the atmosphere for longer periods of time and could be carried offsite by the wind, potentially impacting the air quality of the surrounding area. Specific distances vary greatly depending on topography, meteorology, and intervening vegetation. UTF is proposing to control fugitive dust emissions from the sand and gravel operations by paving portions of the onsite road and by using enclosed conveyors, wet suppression techniques, windbreaks, and reducing the freefall distances for transferring materials. Additional fugitive dust controls (e.g., wheel washers, sweeping/cleaning of Lebers Lane) will be evaluated during any air quality permitting process with PSCAA. These controls, in conjunction with regulatory oversight by PSCAA, will ensure that fugitive dust from facility operation will be controlled to the extent that significant air quality impacts are unlikely. With these controls, and due to the large distances and intervening vegetation, virtually no dust would be expected to travel as far as Chico Creek. Some dust could travel to nearby Dickerson Creek, however, the proposed dust controls would ensure that the levels of dust would be minimized and would not substantially affect the creek. The PSCAA requires air quality permits for sources with the potential to emit harmful levels of pollutants. The criterion the PSCAA uses to determine the adequacy of air pollution controls for a fugitive dust source is the prevention of visible dust leaving the site. UTF will obtain all necessary air quality permits from PSCAA, for which they must first demonstrate that the proposed project will comply with all local, state, and federal regulations, including the National Ambient Air Quality Standards (NAAQS) for PM_{10} and $PM_{2.5}$ (particulate matter). See also Response to Comment 3-19 above. See Section 3.2.4 of the EIS for a discussion of the potential health risks and standard allowable levels of all criteria pollutants.
3-22.	Refer to responses to Comments 3-19 and 3-21.
3-23.	Since December 2006, UTF has provided periodic press releases, open houses and project information via the UTF web site www.uelandtreefarm.com. Mailings were also sent out to 50 residents in the immediate vicinity of the property. UTF will continue to provide periodic public information to the surrounding community via press releases and this web site. Kitsap County will also continue to notify area residents of the development proposal and permit applications as applicable under Kitsap County Code Title 21. Kitsap County has also supplemented the standard notice process with press releases and postings on the County web site. A Notice of Public Hearing sign will be posted near Lebers Lane to advertise the public hearing for the CUP.
3-24.	Ueland Tree Farm recognizes how important non-motorized access to the 1,700 acre tree farm is to the citizens if Kitsap County. It is the intent of UTF to keep this privately-owned property open to the public as long as they are able to operate the tree farm and mineral operations without risking public safety, and as long as the public treats the property with respect.
3-25.	Kitsap County hired a third-party consultant, ESA Adolfson, to peer-review the studies provided by UTF. Kitsap County and ESA Adolfson (and their technical subconsultants) reviewed the studies, and provided comments to Parametrix and their subconsultants identifying areas where they felt additional evaluation, clarification, or analyses were

	needed. The evaluations were revised to address Kitsap County/ESA Adolfson comments, and these studies were then used as the basis for the EIS sections. The County and ESA Adolfson supplied additional information to fulfill the requirements for a SEPA analysis where necessary.

From: Concerned Citizen [uelandminingdevastation@live.com]
Sent: Saturday, March 28, 2009 5:32 AM
To: jwbrown@co.kitsap.wa.us; cgariido@co.kitsap.wa.us; sbauer@co.kitsap.wa.us; dgreetham@co.kitsap.wa.us
Cc: collective@earthfirstjournal.org; info@greenpeace.org; audobonation@audubon.org; information@sierraclub.org; portland.office@defenders.org; info@earthwatch.org
Subject: UELAND TREEFARM MINING DEVASTATION

Council Members,

4-1 I am writing to voice my concerns for the proposed large scale mining operation in KITSAP county. Not only will this project destroy over 30% of the wetlands, but there is little concern for Chico Creek, Washington's major Chum Salmon stream. This does not even

4-2 include noise impact to the peaceful residential area from blasting and increased heavy truck traffic along homes and schools. It is a shame to see that we would allow such

4-3 destruction to a natural area with little concern but a token draft enviromental impact study that plays lip service to appease the permitting process. Keep the area clean, quiet and safe for future generations.

Thank you.

COMMENT LETTER NO. 4 – ANONYMOUS

4-1.	The EIS acknowledges potential impacts to wetland buffers and contributing areas, and potential indirect impacts to wetlands. The project has been designed so as not to directly impact any wetlands on the site. The EIS states, in Section 4.4.2, that there could be a 30 percent reduction in the *contributing area* to Wetland 1, but not to the wetland itself. See also responses to Comments 2-6 and 2-7.
4-2.	See response to Comment 5-4.
4-3.	Comment acknowledged.

March 25, 2009

Statement for the record from Michael S. Beck and Susane Stayrook regarding:

Draft Environmental Impact Statement (DEIS) for the Ueland Tree Farm Mineral Resource Development Project.

We oppose any action as outlined in the EIS for this project for the reasons stated below.

Background: Our residence is local at the intersection of Lebers Lane, Grover Lane and Northlake Way. We have a two-year-old daughter living in this residence, who was born with serious health conditions affecting her heart and lungs. The air quality and noise associated with this development will have a direct physical effect on her health.

Air Quality

The air quality may meet EPA standards, if the mitigation is implemented as proposed in the EIS. The actions will reduce but not eliminate the health risk for our daughter.

1. The dust created from large trucks with trailers on gravel roads, earthmoving equipment. Concrete batch plant and rock crushers will reduce air quality.
5-1 2. The exhaust fumes generated from diesel engine powered equipment will be considerately more than presently exist in this area. The number of trucks with trailers passing within feet of the house could exceed more than 10 vehicles per hour. Presently there are less than two vehicles of this type passing per day.
3. If environment controls were installed to protect the environment inside of the house, this would not address the concerns we would have if our daughter were to go outside to play.

Transportation Impacts

The intersection of Lebers Lane, Grover Lane and Northlake Way has been proposed for reconstruction to meet county standards. Additionally, the EIS states the increase traffic will increase by 186 vehicles per day.

1. Most or all the traffic increase will be large trucks with trailers hauling heavy loads to and from the area. Based on the vehicles estimated, it is reasonable to expect that more than
5-2 twenty large tractor-trailer trucks will be starting and stopping at this intersection per hour. These vehicles are slow to stop and start and this will slow traffic through this area. Resulting in more traffic delays and congestion on a residential thoroughfare. There are no plans to improve Northlake Way. This will result in a serious traffic safety concern. If there were a deceleration lane added to the west side of Northlake Way, this would only make conditions worst because heavy truck would be operating that much closer to the house.
5-3 2. Lebers Lane is an uphill street that approaches our residence from the South. If a truck proceeding down this grade had a mechanical failure and could not stop at the bottom of the hill it will likely windup in the residence. There is no truck run-off and no place to locate one. The safety of the occupants would be in serious jeopardy for their life.

Noise/Vibration Impacts

The noise and vibration from larger tractor-trailer starting and stopping at the intersection will increase the noise levels. Additionally, the trucks with trailer traveling up and down the hill (Lebers Lane) will increase noise levels.

5-4 1. This noise/vibration is not addressed in the EIS; therefore one can only assume that there is no intent to address the impact.
2. This is a residential neighborhood that at present has low noise/vibration levels from traffic. That will change for sure. Trucks with Jake Brakes will create even more noise, which is not addressed in EIS. Given the number of older trucks in the area, the use of the Jake brakes is unavoidable.
5-5 3. Unusual hours of operation can/will occur depending on the contractors and the requirements for material. The state, for example, prefers to operate their construction sights in the evening for lower impact on traffic, which will impact the quarry operations if the material is to be purchased from this location.

Property

We will experience the highest level of impact to our property.

5-6 1. Two sides of our property will be directly affected by the changes to the roads.
2. The value of our property will decline significantly.
3. The level of noise/traffic directly in front of our house is/will be at the highest level of all involved, due to the trucks entering/exiting the access road.
4. Residences and guest entering and leaving private driveways on Northlake Way will experience a significant traffic safety hazard increase.

We see this change as converting a residential road into an industrial road and leaving all of the residences holding the bag of unwanted changes. No one in their right mine would want this to happen in their neighborhood.

Figure out a way to access the area from Werner Road. This road is better suited for this kink of use.

Michael S Beck 3-24-09 Susane Stayrook 3-24-09

Michael S. Beck Date Susane Stayrook Date

COMMENT LETTER NO. 5 – MICHAEL BECK & SUSAN STAYROOK

5-1.	See response to Comment 3-21 above. The health-based air quality standards are designed to protect people, including "sensitive receptors" most susceptible to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by disease or illness, and persons engaged in strenuous work or exercise. Because of the relatively small volume of hourly and daily trucks expected with the proposal and the measures incorporated into the design of the project to reduce dust and emissions, no significant air quality impacts are expected. In response to the commenter's concerns, a simple, worst-case scenario of air emissions associated with truck traffic on Lebers Lane was evaluated using the EPA-recommended MOBILE 6.2 emissions model and the CAL3QHC dispersion model. The model run considered 15 trucks traveling to the site and 12 trucks leaving the site during every hour of operation (i.e., from 7 a.m. to 5 p.m.). This is a very conservative estimate of daily truck volumes, since peak volumes do not occur consistently throughout an operational day. Additionally, the trucks were assumed to idle for two minutes on Lebers/Grover Lane while waiting to turn onto Northlake Way. The model results indicated that even using these worst-case assumptions, the fine particulate matter ($PM_{2.5}$) levels from diesel exhaust would be minimal (i.e., less than 0.5 $\mu g/m^3$) at locations approximately 10-13 feet from the side of the road (i.e., 25 feet from the centerline). Such levels would be well below the 24-hour health-based limit for $PM_{2.5}$ of 35 $\mu g/m^3$. Although this level will represent an incremental increase in diesel emissions, it is well below the level of the short-term standard for fine particles considered protective for even the most sensitive populations. The proposed controls and regulations regarding pollutants in exterior spaces (and, therefore, in interior spaces) are designed to protect sensitive populations from significant health effects related to this proposal.
5-2.	Project plans include improvements to Northlake Way, including 1,200-ft of roadway widening, a left turn lane off of North Lake Way, and a center acceleration/merge lane for left turns entering Northlake Way from Lebers Lane. Refer to the engineering drawings provided in the Appendix to the 2007 Traffic Report (available at www.uelandtreefarm.com) for details. Traffic congestion from the project is not expected to occur due to the relatively low traffic volumes generated by mine operations. The intersection of Lebers Lane and Northlake Way currently operates at a level of service (LOS) B (delay of 10 to 15 seconds). With the addition of a deceleration left-turn lane on the northbound approach and acceleration lane for vehicles turning southbound the intersection will continue to operate with a LOS B. LOS A through C implies that traffic flows with minimal delay. Kitsap County currently has LOS standards adopted only at the roadway segment level and not at the intersection level. In general, intersection LOS D and E imply conditions that approach capacity, and LOS F implies unstable flow with potential for substantial delays (Transportation Research Board, 2000). The operation of the Lebers Lane/Northlake Way intersection will meet the recommended minimum LOS standards.

	Additional traffic analysis details are provided in the Traffic Report. All roadway improvements are proposed within the right-of-way or on property owned by UTF (refer to engineering drawings in Traffic Report). See also responses to Comment 3-6 and 21-7.
5-3.	Lebers Lane and the intersection with Northlake Way will be designed in accordance with Kitsap County Road Standards. For added safety, a guard rail could be placed at edge of the new east bound lane shoulder immediately across from Lebers Lane, and would be considered as a possible condition of approval should the CUP request be approved.
5-4.	The noise technical report includes a discussion of off-site truck noise and its potential to impact residences near the access roads to the site (available at www.uelandtreefarm.com). Section 14.3.2 of the EIS summarized these results in the discussion of cumulative noise impacts and concluded that, although the increase in off-site truck noise will be substantial and noticeable at some locations, the impacts would not be considered significant. For residences relatively near Northlake Way, such as the commenter's residence, the increase due to the trucks would not be considered substantial (i.e., would not exceed 10 dBA), although it could still be noticeable. As specified in the EIS (Section 7.4.2), keeping truck speeds low on the project site and on Lebers Lane will minimize the need for such brakes and any resulting noise impacts. If their use is necessary, engine brake noise is best controlled through the use of properly muffled engine exhaust pipes. Ensuring that trucks accessing the UTF facility have adequate exhaust mufflers will minimize potential noise impacts from the use of engine brakes. The Federal Transit Administration (FTA) "Transit Noise and Vibration Impact Assessment" dated May 2006 provides guidance on evaluating potential noise and vibration impacts from rubber tired heavy vehicles. Per FTA guidance, there is very little potential for vibration impacts from rubber-tired vehicles that will use the site. The relevant sections of the FTA guidance are summarized below. Because the rubber tires and suspension systems of heavy vehicles provide vibration isolation, it is unusual for large vehicles to cause ground-borne noise or vibration problems. When large vehicles cause effects such as rattling of windows, the source is almost always airborne noise. Most vibration problems with large vehicle-related vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing the bump or filling the pothole will usually solve the problem. It is unusual for vibration from trucks to be perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving and operating heavy earth-moving equipment. Vibration due to heavy vehicles associated with UTF project is unlikely because the roadway serving the UTF site is smooth and will be well maintained. Construction related vibration impacts will also be unlikely because mine related activities are over 500-ft from the nearest residence. Similarly, blasting related vibration impacts will not occur because quarry activities are over 3,000-ft from the nearest

	residence. In summary, FTA guidance indicates that vibration impact from the UTF project are very unlikely because the project is not using a road with expansion joints, speed bumps, or other design features that result in unevenness in the road; and, heavy vehicles are not operating close to a sensitive building (research using electron microscopes and manufacturing of computer chips are examples of vibration-sensitive activities).
5-5.	The mine operation will adhere to the hours of operation as stated in the EIS (7:30 AM to 5:00 PM Monday through Friday with no operations on weekends and holidays). The CUP will require specific conditions for hours of operation, if approved.
5-6.	Comment acknowledged. Residences along Lebers Lane and those closest to the Lebers Lane/Grover Lane/Northlake Way intersection are anticipated to be impacted at a higher level than those further from the project site due to increased truck traffic. Proposed mitigation to minimize impacts includes, but is not limited to, road widening with construction of a left turn lane off of Northlake Way as well as a center acceleration/merge lane, the installation of sidewalks, periodic roadway cleaning, and monitoring (see Chapter 1, Table 1-4 of the Final EIS for a description of all proposed monitoring). The CUP process will include a process to consider various conditions to increase compatibility. The design of the project and proposed mitigation measures are expected to reduce adverse land use impacts. It is very difficult to estimate impacts to property values, because there are numerous, interconnected factors that have an effect, including the state of the overall market, property amenities and improvements, lot size, house size, etc. The principal purpose of the SEPA process is to identify and mitigate impacts to the environment. SEPA does not require cost-benefit analysis for weighing the relative merits and/or drawbacks of alternatives (WAC 197-11-450). Cost-benefit analysis as defined under SEPA means a quantified comparison of costs and benefits in monetary or numerical terms.

Comment Letter No. 6

Central Kitsap School District

9210 SILVERDALE WAY N.W.
MAILING ADDRESS: P.O. BOX 8
SILVERDALE, WASHINGTON 98383-0008
360 / 662-1610 • FAX 360 / 662-1611
http://www.cksd.wednet.edu

March 30, 2009

UELAND TREE FARM MINERAL RESOURCES
DEVELOPMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
c/o David Greetham
KITSAP COUNTY - DEPARTMENT OF COMMUNITY DEVELOPMENT
614 Division Street, MS-36
Port Orchard, WA 98366-4682

ATTN: Dave Greetham

Dear Mr. Greetham,

6-1 The Central Kitsap School District has perused the Ueland Tree Farm Mineral Resources Development Project – Draft Environmental Impact Statement and has concerns regarding the potential detrimental
6-2 impact to traffic utilizing Leber Lane and concerns regarding the noise and dust having a detrimental impact to the student population of Jackson Park Elementary School.

If you have any questions, please contact me at 360-662-8275.

Sincerely,

CENTRAL KITSAP SCHOOL DISTRICT NO. 401

Richard Best,
Director of Construction, Facilities & Maintenance

cc: Patti Woolf
David McVicker

COMMENT LETTER NO. 6 – CENTRAL KITSAP SCHOOL DISTRICT

6-1.	See response to Comment 3-6.
6-2.	Jackson Park Elementary School is over a mile away from the proposed mine and is directly adjacent to SR-3. The school would not be affected by noise or dust from the mine, particularly when considered relative to the impact of noise and exhaust from vehicles traveling on SR-3. See also responses to Comments 3-10, 3-13, 3-21 and 5-4 for discussion of proposed safety measures to protect pedestrians in the vicinity, including school children.

From: Charles Dick [cdick6714@yahoo.com]
Sent: Monday, March 30, 2009 12:01 PM
To: dgreetham@co.kitsap.wa.us
Subject: Uland Tree Farm Mining Project

Hi Dave,

I represent the Bremerton Seventh-day Adventist Church on Taylor Rd off Northlake Way. The church is located on Chico Creek, and was impacted by the last flood.

I am concerned by the project on two points: the added traffic on Northlake Way, and the impact on Chico Creek watershed and related aquifers.

7-1 I cannot see how any mining of gravel in the watershed will not affect the creek and adjacent aquifers. I question that the runoff from mining will affect the creek, no matter how much protection is provided. Any trees removed will increase runoff and potential for flooding, as well as reduce watershed storage capabilities.

7-2 The added traffic on Northlake Way, even though not on weekends I hope, will impact an already overloaded roadway.

Unless there are some major changes in the project, we would oppose approval.

Charles Dick
Bremerton Seventh-day Aventist Church

COMMENT LETTER NO. 7 – CHARLES DICK, SEVENTH DAY ADVENTIST CHURCH

7-1.	See responses to Comments 2-12, 2-13, and 2-15.
7-2.	See response to Comment 3-6.

From: Erenn [ekiriaell@wavecable.com]
Sent: Monday, March 30, 2009 2:52 PM
To: 'David Greetham'
Subject: Kitsap Lake Gravel Environmenal Review-resident concerns

Dear Mr. Greetham,

Thank you for this opportunity to provide feedback about the Ueland Tree Farm primary proposal. I was not able to attend the 25 March meeting due to the death of a family member.

I respect Mr. Ueland's right to use his property balanced within the county's laws, regulations, environment and respect for his neighbors in the Kitsap Lake area.

8-1 I am very concerned about Ueland's use of the railroad tracks-and potential degradation of the tracks and rocks-earth that supports the tracks. There is noticeable vibration whenever the Navy trains transit behind our homes. I do not know what environmental impact the vibration has, but I am concerned that the increased commercial travel will significantly increase any impact. I believe this would have to be studied thoroughly. Some of the current railroad ties are cracked and need repair. Has Ueland, the county or an independent evaluator studied what the environmental impact will be on the increased use of the railroad Ueland proposes? How frequently will Ueland trains transit from the spur? What is the tonnage to be carried in each car? What about spills? Erosion? What would the effect be of vibration from the increased railroad use over 32 yrs or 50 yrs? Would the cars be covered so air contaminants would not pervade the environment of our backyards and homes? Has the Navy approved of Ueland's plans to use the tracks? Has the effect of Ueland's increased railroad use been studied? And verified? Who pays for erosion/spills/vibration effects/derailments?

8-2 I am very concerned about the number of heavy trucks using Northlake Way without adequate space for pedestrians to walk and bicyclists to ride safely on the shoulder or edge of the road and not be at risk of being hit by other vehicles. Rain, ice and snow can increase the hazards for peds/bicyclists and vehicle accidents. Has a valid study been completed validating what the impact will be of heavy large trucks (186 a day) using Northlake Way? How often will the road need repair? Who pays for it?

8-3 I would appreciate Ueland doing all they can to reduce noise pollution, as well as not polluting the ground water or Kitsap Lake, Chico creek with contaminants. What county office inspects the safety of

8-4 salmon streams to be free of ground water contaminants? Has an independent valid study insured there would be no contamination of water for wells, streams, and lakes?

8-5 I am concerned about the blasting and vibration effects on fish and wildlife?

8-6 If additional environmental impact studies support some mining, I would support Alternative 3-Reduced Scale Alternative of 93 acres for 32 yrs-without the railroad spur. This would allow Ueland to use the property in accordance with his desires but provide an opportunity to for the community and the county to determine the impact of unintended consequences.

I am concerned about safety and environmental issues hopefully Ueland will continue to be a constructive neighbor for all of us.

8-7 Does Mr. Ueland plan to continue to allow area residents to walk/bike/hike the Tree Farm trails?

Thanks again. Kind regards, Erenn

COMMENT LETTER NO. 8 – ERENN

8-1.	At this time, UTF and the County do not have access to the railroad track to perform an analysis of existing conditions as the tracks are owned and operated by the U.S. Department of Defense (DoD). As described in Section 9.4.2 of the EIS, any future use of the railway for commercial purposes would first have to be approved by the DoD, including review of engineering plans and preparation of an Operating Agreement. The Operating Agreement would cover responsibility and methods of control for accidents and spills. This section of the EIS also describes the types of rail cars likely to be used, the volume of loads, and frequency of trips.
8-2.	See responses to Comments 3-3 and 3-6.
8-3.	UTF will comply with all conditions of the permitting for the proposed project, including those measures intended to reduce potential on- and off-site noise impacts. See also response to Comment 5-4.
8-4.	See responses to Comments in Comment Letters 1 and 2.
8-5.	The EIS acknowledges the fact that there could be significant unavoidable impacts to wildlife in the immediate vicinity of mining operations, including direct loss of habitat during mining operations. Wildlife using the area would likely be disturbed by noise generated during excavation and crushing operations. Individuals would likely move to other suitable habitat on the UTF site or in the vicinity. Wildlife present will also likely be disturbed or frightened by blasting operations, depending on the distance from blasting area, and may be harmed. Implementation of the mitigation measures listed in Section 6.5.2 of the EIS will ensure those potential impacts are minimized to the greatest extent possible. In addition, species that are precluded from the site during operation of the mine would likely return to the site after reclamation is complete.
8-6.	Comment acknowledged.
8-7.	See response to Comment 3-24.

From: Fetters, Deborah L CIV IMF FISC [deborah.fetters@navy.mil]
Sent: Monday, March 30, 2009 8:34 AM
To: dgreetha@co.kitsap.wa.us
Subject: Uuland Tree Farm Development

Mr. Greetham,

9-1 I'd like to voice my opinion about the development of the Uuland Tree Farm, and state that I strongly disagree about allowing that type of development and the damage it will do to our quiet neighborhood on David Road, not to mention add to traffic on the already congested North Lake Way.

I agree that people have the right to develop their own property and make a profit, but at what cost to the existing neighborhood?

9-2 Also, I find it ironic that my husband wanted to add on a few feet on to his existing shop, but it was "too close to the creek", and the country denied his request.

9-3 If they feel the ugly, dirty, gravel pit is so imperative to this County, please find them a way to go out Werner Road instead.

v/r,

Debbie Fetters

4914 NW David Road
Bremerton, WA 98312
360-792-2254

COMMENT LETTER NO. 9 – DEBBIE FETTERS

9-1.	Comment acknowledged. See also response to Comment 3-3.
9-2.	Comment acknowledged. See also response to Comment 2-3.
9-3.	Comment acknowledged. See also response to Comment 3-2.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Thursday, March 26, 2009 12:28 PM
To: dgreetha@co.kitsap.wa.us
Cc: Paul Dorn; rich bennett; Dave Epperson
Subject: Draft DEIS, UTF
Exhaustive study, but still a project under discussion.

My wife, Elaine, and I own parcels 041 and 115. Dickerson Creek runs through our properties.

10-1 I prefer the current alternative, but may accept the Reduced Scale Alternative. I feel the full alternative development, including the concrete batch plant, may irrevocably alter this community.

10-2 I see under 9.2.1, our private driveway serving four families is not even addressed! Considering the truck traffic proposed, I feel some mitigation must be made for our historical entrance to Northlake, or does Ueland propose to simply turn us into truck dodgers (one hit, and we'll make the news---splat!). Several children and elderly live in this ignored area.

10-3 Sect. 4.5.4 is also very important. Dickerson is the main creek affected by all this. Yes, it is year around and I have been working with the Suquamish to see what can be done to improve fish habitat. ANY reduction in water flow is not acceptable to me. I know the fish need this constant flow. I have observed this stream crowded with salmon, at approximately Thanksgiving. They don't turn up for the meal, but to leave their young for the future. I would go so far as to say that many of the Chico fish end up here (where the Washington State fish ladder is broken, but that is another irritation).

10-4 I still consider the 1990 GMA as relevant (8.3.2). The current zoning of 8.2.1, could be amended to allow a greater density residential with little harm.This neighborhood is a residential area, and NOT industrial. This has never been a factory area.

10-5 I grew up in a houseboat on the Duwamish River in Seattle. I watched the first avenue south bridge being built (span number 1, after the little green bridge was torn down). I lived across from the cement plant you NOW see from the first south bridge. My asthma suffered terribly. I don't relish having that dust that I have avoided for 50 years in my lungs again. People don't realize how cement dust permeates your house and clothing. It is like talcum powder and is impossible to keep dusted up. Oh yeah, the cement trucks washed out their beds in the only inlet stream to the bay------no more salmon as that became the perfect landfill. I watched it happen, and South Seattle Community College is now documenting my experiences as living history. Is Dickerson Creek next?

10-6 Pileated Woodpeckers------A rarely sighted species as it is very private. Yep, we have a mated pair that lives nearby in the forest. I have personally seen them, along with witnesses. We can date/record our sightings if needed.

Needless to say, I have only glanced through the DEIS. I expect to find more commentary later.

Bernie JMW Fleming PO Box 5205 Bremerton, Wa 98312-0492 bfleming@wavecable.com

COMMENT LETTER NO. 10 – BERNIE JMW FLEMING

10-1.	Comment acknowledged.
10-2.	See response to Comments 3-3 and 3-6.
10-3.	See response to Comment 2-12.
10-4.	The proposed uses are consistent with the current zoning designation of Rural Wooded (RW) and Forest Resource Lands (FRL). See also response to Comment 3-6.
10-5.	The cement brought in to the project site for use in the proposed concrete batch plant is recognized as a potential air pollutant, as discussed in Section 3.3.2 of the EIS. Transport and handling of this material would be controlled through the use of standard best management practices for this type of facility. In addition, the level of contaminants suspended in the air would be regulated by the required PSCAA permit and monitored per EPA standards, as described in Section 3.4.3 of the EIS. The project would be designed to avoid discharges from all operations, including the concrete batch plant and truck wash-out areas, to groundwater, streams, or wetlands. See also responses to Comments 2-12 and 2-15.
10-6.	The EIS acknowledges the use of the UTF site by pileated woodpecker and that additional documentation of this species is desirable for project planning and permitting. See response to Comment 8-5.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Thursday, March 26, 2009 1:23 PM
To: dgreetha@co.kitsap.wa.us
Subject: UTF DEIS
An additional comment or two:

I was at the meeting last night.

11-1 I don't think the project would have too many protests if it changed the egress and ingress point. They are intending to go right through the middle of an established residential community. This disruptive action will cause nothing but anger and determined resistance to this project. If a new road could be placed elsewhere, I think most of the community activism would disappear. Otherwise, I believe this project faces an "uphill" battle.

Bernie JMW Fleming bfleming@wavecable.com

COMMENT LETTER NO. 11 – BERNIE JMW FLEMING

11-1.	See response to Comment 3-2.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Friday, March 27, 2009 11:15 AM
To: dgreetha@co.kitsap.wa.us
Cc: Dave Epperson; rich bennett; pdorn@silverlink.net
Subject: Fw: Emailing: lime, Pertinent to Draft EIS UTF

Attachments: lime.pdf

12-1 This is the EPA result of a cement plant in Oregon. I used to go through this place when it was still in operation. It is a mess now and the state can't unload it.

Bernie JMW Fleming bfleming@wavecable.com

Comment Letter No. 12

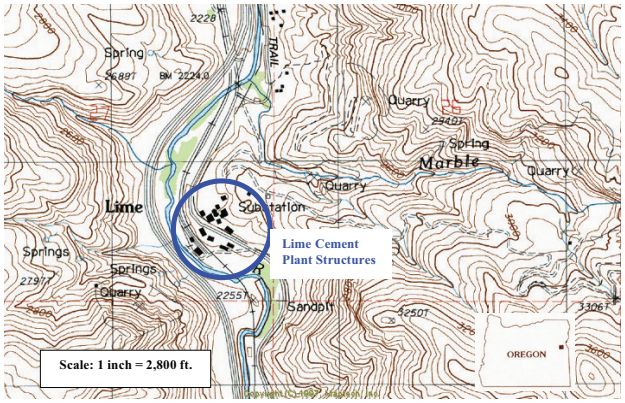
Targeted Brownfield Assessment Former Lime Cement Plant, Baker County, Oregon

Project Overview

The Oregon Department of Environmental Quality (DEQ) completed a Targeted Brownfield Assessment (TBA) at the 1,034-acre Former Lime Cement Plant near Huntington, Oregon in May 2001, under a Cooperative Agreement with EPA Region 10. The purpose of the TBA was to determine whether past operations had caused contamination that might prevent Baker County (the property owner) from making the land available for industrial redevelopment or from razing site buildings and developing the property as public greenspace. The map below shows the site's location in eastern Baker County.

Site Background

Sun Portland Cement Co. built the plant in the early 1920s to supply cement for the construction of Owyhee Dam, located in adjacent Malheur County. After the dam's completion in 1928, Sun sold the operation to Oregon Portland Cement Co., which was eventually absorbed by Ash Grove Cement. Plant activities included on-site and off-site mining; cement manufacturing; electrical and maintenance support (using on-site transformers); vehicle maintenance, fuel storage, and dispensing; process water collection/discharge; and on-site disposal of waste kiln dust, refractory solids, and other materials. The plant closed in 1980, and Baker County foreclosed on most of the property in 1999. (Ash Grove retained ownership of a 14-acre area comprising the waste piles of kiln dust, and has completed its own study there; the TBA excluded this portion of the property.)



In May 2000, the Baker Co. Board of Commissioners requested a TBA to investigate the possibility of site contamination from polychlorinated biphenyls (PCBs), petroleum, metals, and related compounds. The county had no funds to complete an investigation on its own, but wished to clean up and level the site to make the property more amenable to redevelopment. Recently, the county had used a DEQ grant to remove large quantities of discarded tires from the site, and this positive interaction with DEQ encouraged county commissioners to request further assistance from DEQ and its TBA funding partner, Region 10 of the U. S. Environmental Protection Agency (EPA).

What We Did

EPA approved the TBA in June 2000, and DEQ developed a scope of work, based on concerns that the agency's staff had noted during site visits in February 2000. For example, oil from a pole-mounted transformer, thought likely to contain PCBs, had been dumped onto the ground. There also was stained soil, possibly from waste oil, in a small building adjacent to what may have been a vehicle repair shop. Several chemical drums were present in this area. In October 2000, DEQ collected 11 soil samples, 10 from the areas of concern noted above, and one from a background location. EPA laboratories analyzed all samples for volatile and semi-volatile organic compounds (VOCs/SVOCs), PCBs, and pesticides. Selected samples were also analyzed for metals.

What We Found

Low levels of VOCs were present in some samples, but at concentrations below EPA Region 9 Preliminary Remediation Goals (PRGs) for residential use. (*Residential* PRGs are considered the most conservative screening levels for evaluating specific contaminants in soil, while *industrial* PRGs are somewhat higher and therefore less conservative).

All samples contained SVOCs; several contained polynuclear aromatic hydrocarbons (PAHs) above residential or industrial PRGs. Petroleum levels ranged up to 5,955 mg/kg.

Four samples contained PCBs, at levels up to 3.7 mg/kg. Three of these samples exceeded residential PRGs, and two exceeded industrial PRGs. While pesticides were detected in two samples, their low levels did not appear to pose any risks to human health or the environment.

The only metal of initial concern was arsenic, since all six samples analyzed for metals contained this compound above the industrial PRG of 2.4 mg/kg. However, based on data from Ash Grove's separate investigation of the on-site kiln dust disposal area, DEQ concluded that the arsenic in the TBA samples represented naturally occurring levels of this metal, rather than contamination from past industrial activities.

Based on these results, DEQ determined that direct-contact and airborne exposures to soil at several locations on-site could threaten human health, but that there was negligible risk to groundwater or surface water. DEQ recommended that Baker County remove and properly dispose of impacted soil in the vicinity of four TBA sample locations, and work with Ash Grove to remove the small, residual piles of kiln dust and refractory brick that extend beyond Ash Grove's property boundaries.

The Next Steps

In pursuing possible industrial re-use (or greenspace development) of the site, Baker County has discussed applying for a Community Development Block Grant that would fund building demolition/removal and the remedial steps recommended in the TBA. The county may also negotiate with Ash Grove over some or all of these site cleanup issues, but in any event is motivated to remove the "eyesore" visible from the highway and continue pushing for site redevelopment.

For more information, please contact:

Brian D. Cole, Chair, Baker County Board of Commissioners (Baker City): 541-523-8200.
Katie Robertson, Project Manager, Oregon DEQ (Pendleton): 541-278-4620.

COMMENT LETTER NO. 12 – BERNIE JMW FLEMING

12-1.	Comment acknowledged. The proposed project does not include the construction or operation of a cement plant. The concrete batch plant, described in Section 1.5.2 of the EIS, would use a limited volume of cement brought into the site under controlled conditions. See also response to Comment 10-5.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Friday, March 27, 2009 12:58 PM
To: dgreetha@co.kitsap.wa.us
Cc: rich bennett; Dave Epperson; Paul Dorn

Subject: Fw: seattletimes.com: Seattle cement plants puff out toxic mercury

Some more about cement plants:
>
> Seattle cement plants puff out toxic mercury
>
13-1 > Two Seattle cement plants puff out as much as 100 pounds of mercury each year, according to the Puget Sound Clean Air Agency and the companies.
>
>
> http://seattletimes.nwsource.com/html/localnews/2008069635_cement24m0.html

COMMENT LETTER NO. 13 – BERNIE JMW FLEMING

13-1.	Comment acknowledged.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Monday, March 30, 2009 9:54 AM
To: dgreetha@co.kitsap.wa.us
Cc: Paul Dorn; rich bennett; Dave Epperson
Subject: Cement Kiln Dust Wastes | Special Wastes | Wastes | US EPA

http://www.epa.gov/osw/nonhaz/industrial/special/ckd/index.htm

14-1 My last comment includes the above web page from the EPA, US. I am concerned about the arsenic level increase and the other impacts upon our otherwise northwestern habitat.

14-2 Please remember, the FOOTHOLD we allow now is as small as it would get. The facility will only grow larger with time and impact the neighborhood more. Cement dust is dangerous in a residential community and I certainly don't want to see Northlake Way turned into our version of Rustin (Sic?) Way (Tacoma).

14-3 The Chico community is residential, and not industrial. Putting in cement plants condemns the area to industrial usage and a gradual removal of the residential community. Our decisions now will last for generations of Bremertonians.....

Thank you, Bernie JMW Fleming bfleming@wavecable.com A watershed conservator.

COMMENT LETTER NO. 14 – BERNIE JMW FLEMING

14-1.	Section 3.3.2 of the EIS describes in detail the likelihood of potential impacts of arsenic on air quality and the environment. The EPA's SCREEN3 dispersion model was used to simulate a worst-case scenario of the potential release of toxic air pollutants, including arsenic, from operation of the proposed project. The model showed that maximum model-predicted concentrations of all pollutants were well below the Acceptable Source Impact Levels, as determined by the EPA.
14-2.	The EIS evaluated the proposed project at full build-out, or the maximum amount of development allowed by the proposed permits. See also response to Comment 12-1.
14-3.	See responses to Comments 3-6 and 10-4.

From: Bernie JMW Fleming [bfleming@wavecable.com]
Sent: Monday, March 30, 2009 11:16 AM
To: dgreetha@co.kitsap.wa.us
Cc: Paul Dorn; rich bennett; Dave Epperson
Subject: Emailing: below tracks 1, below tracks 2, below tracks 3, below tracks 4, above tracks 1, above tracks 2, above tracks 3

Attachments: below tracks 1.jpg; below tracks 2.jpg; below tracks 3.jpg; below tracks 4.jpg; above tracks 1.jpg; above tracks 2.jpg; above tracks 3.jpg

15-1 Okay, I did think of one other thing: By attachment are photos taken of Dickerson Creek BEHIND the railroad dike. Note that the water is at the top. These were taken 12-3-07. I don't believe this Navy culvert (inadequate at best) has been addressed anywhere in the DEIS. Were this to give way under additional stress or too much water, the resultant tsunami would inundate everything below on Northlake. Dickerson is a year round stream, increased run-off would make this "earth dam" untenable, like what just happened in Indonesia. Who'd be responsible for the resulting mess; UTF, the Navy, or county Kitsap (now that it has been alerted)?

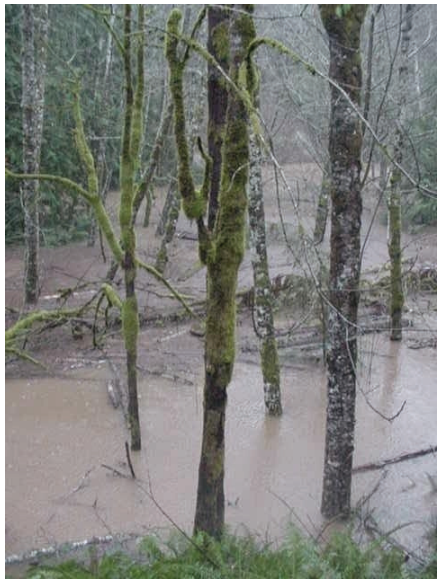
Bernie JMW Fleming befleming@wavecable.com

(see attached photo images)

Comment Letter No. 15

Above Tracks 1

Above Tracks 2



Above Tracks 3

Below Tracks 1

Comment Letter No. 15

Below Tracks 2

Below Tracks 3

Below Tracks 4

COMMENT LETTER NO. 15 – BERNIE JMW FLEMING

15-1.	See response to Comment 2-12.

From: Sheila Guizzetti [sheilaguizzetti@mac.com]
Sent: Monday, March 30, 2009 3:04 PM
To: openline@co.kitsap.wa.us
Subject: Fwd: press release

Please forward to David Greetham, environmental planner for Kitsap County
Letter Re: Ueland Farm mining project

David Greetham,

I sent this email earlier but was uncertain if it was emailed to the appropriate department or so I am emailing it again in hopes that it will find a way to your desk. I add my voice to the concerns of others about this project which seems an ill conceived fit for a residential neighborhood. I applaud the efforts of the Ueland Tree Farm to be environmentally aware, but my instincts tell
16-1 me that the outcome will be largely negative for the community, for people and for the natural wildlife whose corridors are shrinking, as well as to the finite and priceless natural resources of water and air contained within. I think the EIS basically identifies that those things are an acceptable risk for the good of the project. I disagree. Although no investment comes without risk, as we all have discovered, this investment places great risk on our homes and community. I find that unacceptable.

Respectfully,
Sheila Guizzetti
2825 Northlake Way
Bremerton

Begin forwarded message:

From: Sheila Guizzetti <sheilaguizzetti@mac.com>
Date: March 30, 2009 2:08:40 PM PDT
To: dbear@co.kitsap.wa.us
Subject: press release

To whom this concerns:

I am writing to submit my concern over the reality of living next door to the Ueland Tree Farm gravel mining project. Although the environmental impact statement is comprehensive and appears environmentally sensitive in tone, I think it glosses over the profound, long-term impacts to the community and neighborhood, to people and wildlife, to our general quality of life. The
16-2 EIS identifies that there will be significant, measurable increases in noise, traffic, as well as diminished air quality, negative impacts on wildlife, potential risks water quality (including risks to Chico Creek, which is considered the Kitsap Peninsula's most productive salmon stream, Kitsap Lake and the water shed areas), increased risk of storm water runoff with related flooding risks, impacts on view corridors, increased impacts on the transportation systems, and few jobs will be directly added. The plan, as I understand it, is to blast and mine out ten acre strips at a time, fill them up and reseed. Not exactly what anyone would welcome in their neighborhood.
16-3 When the bedrock is removed and replaced (with fill ?), even if it is seeded, it stands to reason that land stability, flooding, and the potential for landslides with the risk of diminished water quality may be impacted This is a 50 year plan, so that is a long time to see if we come out

16-4 better or worse for this experiment. Families live here and school buses stop here. We are not talking about homes being built around a mining project, we are talking about plunking down a mining project replete with blasting, noise, dust and pollution, in a rural neighborhood. Traffic has long been an existing problem on Northlake Way. Many drivers love to use the straight-of-
16-5 way section of Northlake Way as a raceway and there lots of accidents on the road with blind curves and intersections at both ends. It will get much worse with 180 additional commercial dump-trucks rumbling down Northlake Way on a daily basis, dropping gravel, creating dust and adding to the traffic noise and hazzards. It means that we are going to live in a construction zone for the next 50 years. Consider that toll on the value of the homes and the neighborhood. On a regular basis, with sustained rainfall, the bank below Leber Lane slides onto Northlake Way. There is a concrete barrier that serves as testimony, because it placed there to hold back the mud that frequently ends up on Northlake Way. The planned ingress and egress for the project is planned from Leber Lane which will create a highly dangerous intersection onto Northlake Way.
16-6 With the recent big storms that we have had, multiple bridges have been washed out on or around Northlake Way. Northlake serves as a main Seabeck/Central Kitsap to Bremerton transportation corridor and the added wear and tear on the county highway will add greatly to the cost of maintaining it. During the last "100 year storms," the impacts of poor land management, has cost the state, county and individuals greatly. The state of Washington is $9 billion in the red. Local gravel is a benefit but it is hard to put a price on what it is going to cost Kitsap County. One thing is clear. It all flows downhill.

Sheila Guizzetti
Bremerton

Sheila Guizzetti
sheilaguizzetti@mac.com

COMMENT LETTER NO. 16 – SHEILA GUIZZETTI

16-1.	Comment acknowledged.
16-2.	Comment acknowledged.
16-3.	The reclamation plan, as described in Section 1.5.2 of the EIS, would be segmented in coordination with the mining sites. As each new 10-acre mine site is opened, the previous site would be reclaimed. Reclaimed sites would be back-filled with non-saleable mine material (i.e., "overburden") and/or clean imported soil. All fill placement, as well as other operations, would follow design guidelines and methods outlined in the Department of Natural Resources Reclamation Permit required for the project, described in Section 2.5 of the EIS.
16-4.	See responses to Comments 3-6 and 3-13.
16-5.	See responses to Comments 3-2, 3-3, 3-13, and 3-17.
16-6.	All road improvements proposed as part of the project would be designed and built to Kitsap County standards, including roadside drainage. See also response to comment 3-3.

From: Roxanne Bryson [rbryson@hollyridge.org]
Sent: Friday, March 27, 2009 12:44 PM
To: dgreetha@co.kitsap.wa.us
Subject: uelantreefarm

17-1 The Holly Ridge Center located on Taylor Road, provides services to fragile families with infants and toddlers with special needs and adults with disabilities. Last year we treated 695 children and 130 adults. Families use the bus stop on Northlake Way & Access buses, unloading small children to and from, the impact that this plan has on our road seems unsafe for the traffic coming and going with disabled transit vans, and families we serve.

Roxanne Bryson
Executive Director

Holly Ridge Center
5112 NW Taylor Road
Bremerton, WA 98312
360-373-2536
www.hollyridge.org

COMMENT LETTER NO. 17 – HOLLY RIDGE CENTER – ROXANNE BRYSON

17-1.	See responses to Comments 3-3, 3-13 and 5-1 for a discussion of proposed measures to address pedestrian safety and air quality concerns.

From: Chris and Holly Hunt [chris1648@hotmail.com]
Sent: Monday, March 30, 2009 12:15 PM
To: dgreetham@co.kitsap.wa.us
Subject: POSSIBLE SPAM! SCORE = 5.1 Ueland Plan

Dear Mr. Greetham,

We are writing with our concerns regarding the Ueland Tree farm/Rock Quarry. We live on Wildcat/Chico creek, across the stream from the SDA church. You have been to our property in the past. Our concerns regarding the Ueland plan are many, the greatest being stream discharge levels as they pertain to homeowners, noise levels, increased traffic and how these all relate to property values and wildlife.

18-1 We believe that our little area is unique. We purchased in this area for the access to nature and wildlife, and the chance to help take care of a little piece of it. We could not let this opportunity to voice our opinions pass in good conscience, therefore. We understand the struggle between private property and protecting our wildlife. We feel that the risks for damaging the local wildlife associated with the Ueland Plan are too great. When coupled with the almost certain risk of decreased property values, and increased risks for flooding, noise pollution and environmental pollution, we must strongly disagree with the plan in its entirety. We hope and would assume that the environmental impact findings support our position.

We have read the Ueland Plan, as it pertains to our area. We are aware of the measures Ueland is prepared to take in regards to the Chico Creek Watershed. We also are all too aware of how long it takes for roots to dig deep, of how often the best human plans falter and how a stream that is being protected or protected against can change direction substantially in one storm. The
18-2 massive bank reconstructions done across the stream from us in 2008, at great expense to federal, county and private groups, are likely to be bi-passed completely by the stream in the next 5-10 years, or possibly with the next big flood. I believe it was you, Mr. Greetham, that predicted this path by the stream when you were on our property some 3-4 years ago. It now seems inevitable. We know how quickly large changes can happen with this stream.

So our questions are these:

18-3
- What backup plans are there for the Ueland Environmental Plans?

18-4
- What is Ueland responsible for when they've completed their environmental plans and the stream diverts another direction away from the area they've "protected", or perhaps toward its operations?

18-5
- What monitoring of Ueland will be put in place to protect our local wildlife, and private homeowners downstream?

18-6
- What enforcement is there for the permit stipulations and are any fines much greater than the profits Ueland stands to gain from their quarries? (They are already obviously willing to go through the great expense of the permit process against future profits – what else will they be willing to pay? Perhaps the cost of fines?)

18-7
- Who will pay for the damage to property and home that occurs while their plans are in-process or when the plans fail, or when Ueland just doesn't adhere to the permits? More specifically, who will pay for our new septic when our current one falls into the stream from flooding due to watershed tinkering, or the cleanup of the stream from situations like this?

Comment Letter No. 18

18-8 As we see it, private property owners have no recourse and are at the mercy of The Kitsap County DCD and The State of Washington Dept of F&W for protection.

As you may recall/be aware of, we were one of the unlucky private homeowners who received no funding for stream measures that were necessary (according to Bob Barnard, when on our property) from the floods in Dec. of 2007. (See HPA 111928-1.) We took a 2nd mortgage on our home to fund the clearing of the log jam present. We know we are not the only ones who incurred great personal expense for bank stabilization/stream reconstruction that threatened their homes or others. (Those homes that had immediate threat received assistance; our threat was in
18-9 the next storm or the next years' storm and to our property as well as all those upstream of the log jam.) Perhaps our greatest concern is the private and county financial risk of more flooding. After living on this stream for 6 years and knowing the current fluctuations in discharge rates for this stream, it seems ludicrous that any private owner would be given access to do anything in the watershed that would even temporarily alter the outflow of Chico Creek or have a potential for it in the future. The only plan that seems responsible, in our view, is to allow such access **only with** a total financial responsibility for the entire length of the stream downstream from their actions.

And then there are the fish. You and your department, of course, have more expertise in this area, and we cannot speak with any expertise at all other than to say that we know the extreme measures to which we have been held to protect the salmon path by both the DCD and F&W.
18-10 We are happy to do it in the interest of the environment and salmon. We would hope that the same strictness of measures would be applied to Ueland that has been applied to ourselves and our neighbors, in the interest of wildlife. We trust your department in this area, knowing that if at all possible, every measure will be taken to protect the wildlife around us.

We know that Ueland has had appropriate studies done for the noise levels of its operations. We also know studies show that the affects of increased noise levels on humans relates negatively to continued health and well-being. We are a stay-at-home, homeschooling family. To be
18-11 subjected to the increased noise of the trucks, the BEEPing of the reverse vehicles (which loudly resonates in our valley) and other loud noises on a daily/hourly basis will undoubtedly have its toll on our family and our schooling. We can only assume similar negative effects on the school across the stream (SDA) and the wildlife in the area.

In addition, the traffic in our area already seems overburdened with Seabeck commuters. Our stretch of Northlake Way at the end of David Road is a common crossing place for raccoons,
18-12 squirrels, opossums and other wildlife sharing our area, as well as pedestrians. Massively increased traffic, and the noise and dust from this traffic are all strong considerations for us, and we hope for your department as well.

All of the things we've mentioned will also have the added impact of property devaluation. In
18-13 these economic times, our property has already been devalued significantly. The noise, increased traffic, decreased wildlife, increased stream-flooding risk will also have a large impact

on the value of our home. We have always been a "will we have to move?" kind of family, knowing that while we own our home and property, it doesn't mean we have the rights to whatever happens around us. These changes, however, along with the already depressed home values, would make it impossible to afford a move, however tragic that might be for us to even consider. If we thought we were the only ones in this circumstance, we would not mention it.

18-13

Our little area of "nature littered with homes" seems to hold its own peaceful coexistence with wildlife. We strongly feel that allowing Ueland to proceed with its plans would end this forever.

18-14

Thank you for the opportunity to share our views on this plan.

Holly and Chris Hunt

COMMENT LETTER NO. 18 – CHRIS & HOLLY HUNT

18-1.	Comment acknowledged.
18-2.	Comment acknowledged.
18-3.	The development proposed by UTF is subject to the conditions and reporting requirements outlined in the various permits required by local and state agencies for the project, including Kitsap County, the Department of Ecology, and the Department of Natural Resources. These conditions will be imposed throughout the life of the project. If at some point the project, as designed, and permit conditions are found to not adequately mitigate the potential impacts from development and operation, UTF will work with the authorizing agencies to supply new procedures and/or compensation for losses.
18-4.	UTF will be responsible for potential impacts caused by construction and operation of the proposed project under the terms of the various permits, including those monitoring and reporting plans described in the EIS. All monitoring plans for the project include provisions to adaptively manage operations and mitigation if impacts start to occur.
18-5.	The EIS describes the various monitoring plans that would be required for the proposed project for air quality (Section 3.4.3), wetlands (Section 4.5.3), streams (Section 4.5.4 and 5.5.4), groundwater (Section 5.5.3), and habitat management (Section 6.5.3). All monitoring programs proposed for the project are described in Chapter 1, Table 1-4, of the Final EIS.
18-6.	Enforcement of permit conditions lies with the regulatory agencies (i.e., Kitsap County, Ecology, DNR, etc.). Several of the regulatory agencies, including the Department of Ecology, impose fines for permit violations; these fines are determined on a case by case basis, depending upon the type and magnitude of infringement.
18-7.	See response to Comment 5-6.
18-8.	Comment acknowledged. The EIS process is intended to allow private property owners to voice their concerns, to ensure that the process is open and fair.
18-9.	See response to Comment 2-12. The project will be designed in accordance with all applicable surface water requirements, including those by Kitsap County and the State Department of Ecology, to ensure that downstream residents are adequately protected.
18-10.	See responses to Comments 2-3, 2-12, and 2-15.
18-11.	See response to Comment 5-4.
18-12.	See responses to Comments 3-1, 3-2, 3-3, 3-6, and 5-2.
18-13.	See response to Comment 21-5.
18-14.	Comment acknowledged.

Comment Letter No. 19

From: Paul McCoy
To: Greetham, David
Subject: Ueland Tree Farm, March 26, 2009

19-1 I attended the DEIS meeting at King's West School with my Wife Ann. We are in agreement our County needs new Businesses and we are in agreement the materials available to mine are needed for County Growth, as well as job creating.

19-2 We own three residences on the 3100 block of Northlake Way and cannot imagine dump trucks pounding their way up and down the arterial daily. We have experienced the influx of traffic from the Chico Bridge being wash out for over a year and have wondered why it is taking so long to repair. It has turned Nothlake Way into a traffic nightmare. Our suggestion is to find another way to access the proposed mining area and Not turn Northlake Way into another industrial park.

Ann has delivered mail for USPS for many years. She delivered mail at the Fred Hills Batch plant for several years. Her advise to all is go to South Kitsap Industrial Park by the Airport and park and watch the trucks coming and going at Fred Hill's for a preview of what Northlake Way could turn into.

Paul McCoy
3156 Northlake Way NW
Bremerton Washington 98312
360-373-6184

Paul McCoy

COMMENT LETTER NO. 19 – PAUL MCCOY

19-1.	Comment acknowledged.
19-2.	Kitsap County has recently replaced the bridge at Chico Way, which will likely reduce the amount of traffic on Northlake Way, including large truck traffic. See also responses to Comments 3-6 and 3-10.

From: Bonnie McIntosh [bonnie.mcintosh@gmail.com]
Sent: Wednesday, April 01, 2009 4:58 PM
To: dgreetha@co.kitsap.wa.us
Subject: Ueland Tree Farm Comments

20-1 I am happy that most of the woodland behind my house will be preserved with its wildlife, but I am still concerned. Ueland has generously begun buying the properties along Leber Lane supposedly because of the trucks that will be driving through and the extra noise levels (Leber Lane totals of 44 - 47). Unfortunately, those of us on Grover Lane have noise levels of the same or higher than those on Lebers (Grover Lane totals of 44 - 50). We are left to put up with the additional dust and noise levels with no consideration.

20-2 While they currently don't use North Lake Way frequently, I know that I can feel every large tractor-trailer that comes down North Lake Way since Chico way closed. I consider how many more trucks will be using that street/Lebers Lane and just shudder.

20-3 In addition, I don't believe there aren't any bald eagles in that forest area. Parametrix states that "Although bald eagles were seen flying over the property during Parametrix's field surveys, it is unlikely that they use the area for nesting, roosting, or foraging due to lack of dense, multi-storied forest canopy or large expanses of open water." (Page 118) So I'm wondering what the pair that like to sit in the tree in back of my property are doing. (Maybe just out for a spin?) These two are frequently seen in the trees behind my property. While they are not endangered, they are still classified as a sensitive species.

Bonnie McIntosh

COMMENT LETTER NO. 20 – BONNIE MCINTOSH

20-1.	See responses to Comments 3-21 and 5-4.
20-2.	Kitsap County has recently replaced the bridge at Chico Way, which will likely reduce the amount of traffic on Northlake Way, including large truck traffic. See also responses to Comments 3-6 and 3-10.
20-3.	The WDFW PHS program maintains a database of known bald eagle (and other priority species) nests and communal roosting areas. Not all bald eagle nests are contained within the database because there are no comprehensive surveys for this species due to a lack of state funding. Anecdotal records of bald eagle use and potential nesting will be taken into account by the Kitsap County staff and considered as part of their final determination of wildlife habitat area classification. The text has been modified to acknowledge anecdotal sightings of bald eagles in the area. See response to Comment 8-5.

Comment Letter No. 21

March 28, 2009

Comments on DEIS for Ueland Tree Farm Mineral Resource Development Project
February 2009

From: John and Roberta Mikesell
1914 Northlake Way, N.W.
Bremerton, WA 98312-8817

(360) 373-5470

mikesell@ wavecable.com

Our primary areas of concern are site access, noise, pollution, traffic impacts and the general disruption of community cohesiveness. Realizing that EIS's by their very nature tend to be justification documents, not disclosure documents, with vital information often (usually) hidden in appendices and addenda which are not readily available to the uninitiated, our comments are as follows:

General Comments:

The proposed Lebers Lane access to the project site with the resultant increase in heavy truck traffic will cause the disruption of an existing, long established, residential community. Many voting, tax-paying, homeowners have been in residence for 40+ years. The increased heavy truck traffic volume will pose a danger to the ingress and egress of residences on Northlake Way and hinder daily activities of residents, such as merely attempting to enter or leave a driveway. Truck traffic will also increase noise and air pollution well beyond acceptable limits for a residential community and decrease property values in the immediate area. 21-1

A Concrete Batch Plant at Gravel Mine Site A should not be sited in such close proximity to an existing, long established, residential community. Such siting is unacceptable because of the noise and air pollution it would impose on the adjacent residential community. If a Concrete Batch Plant is necessary for the project, Gravel Mine Site B would be a better location as it is further removed from close proximity to human habitation, i.e., the adjacent residential community.

Specific Comments:

Project Description:

Alternative 2. The proposed Development Alternative
"Development of this alternative would occur over the projected 50-year period."

21-2 **Alternative 3. The Reduced Scale Alternative**
"Development of this alternative would occur over an approximate 32-year period."

Question: What does this imply? How much of the project would be completed in any given timeframe within the stated period? What level of community disruption could be expected and when?

Comment Letter No. 21

Comment: The 50-year and 32-year periods might be construed to imply that the proposed development really is no "big deal" and would have negligible impacts on the community as it would occur over time and everything changes over time. However, to be economically viable, profits have to be forthcoming and the sooner the better.
21-2 Therefore, it is reasonable to expect that severe adverse impacts on the existing community would occur at the start of the project and are indeed a "big deal" to those affected. These impacts would continue to a lesser extent throughout the life of the project, but by then the character of the community would have changed in response to those impacts and they would be less noticed.

Chapter 9 Alternate Access Evaluations

Pg. 9-13 "The evaluation concluded that the access alternative that used Lebers Lane was most cost effective."

Comment: Well, duh! This is not rocket science. It's an existing access to the property that has been used for years. What could be simpler and cheaper. Does the term "quick and dirty" come to mind?

Question: What about a southern access via right-of-way through the City of Bremerton's Gorst Creek watershed?

Comment: Because of water quality issues, the Gorst Creek Watershed is not used for municipal water supply. However, it does have connecting roads to the Ueland Tree Farm property. The road gradients are not excessive and would provide access through a less densely populated area through Gorst to SR's 3 and 16. This may require the grading of some existing forest roads, but after all, it is a gravel mining operation so the expense would be
21-3 minimal. Also, this would eliminate the need for "construction of over 7,000 feet of new road and acquiring right-of-way on up to 19 properties."

At the public meeting on March 25,2009, a Ueland representative indicated that a south access via Warner Road was not viable because of road grade concerns. He then dismissed access through the Bremerton Watershed as not possible because of some not well articulated, nebulous, concerns about the uncertainty of approval by the City of Bremerton and the City's concerns regarding unauthorized public access to the property.

I humbly suggest that the City of Bremerton, as an advocate of tax-based commercial enterprise, and as a good neighbor and a supporter of more industrial diversification, would be a willing partner in this endeavor and grant access through their "watershed" property. Public access should not be a problem as it is presently restricted and could continue to be.

21-4 **Question:** Does "most cost effective" include re-routing Lebers Lane and Grover Lane to provide a tee intersection on to Northlake Way and the widening of Northlake Way to accommodate the left turn pocket and acceleration and deceleration lanes as described on page 9-9, under Roadway System?

21-5 **Question:** How many homes on Lebers Lane will be taken to accommodate the proposed road re-configuration? How many families displaced? It has been reported that seven home owners on Leber Lane have been offered buy-outs by Ueland. Is this included in the cost effectiveness analysis? What are the impacts on affected Northlake Way properties? Will buy-outs be offered to offset property damages and subsequent devaluation? If so, how does this factor into cost effectiveness of the Leber Lane preferred access?

School Bus Service

21-6 Pg. 9-14 "The planned roadway improvements along Lebers Lane, Grover Lane, and on Northlake Way would enhance the pedestrian walk routes from the local residences to the existing school bus stop on Northlake Way"

Comment: Let's be honest and call them roadway modifications, not "improvements" The "school bus stop" is unmarked and could just as easily be identified as at Lebers Lane or Grover Lane. There is nothing to distinguish it from the other "school bus stops" at David Road and Taylor Road, other than the fact that a southbound bus can pull off Northlake Way and be out of the traffic flow.

Question: What residents will be left on Lebers Lane to use the sidewalk to the "bus stop"?

9.2.3 Traffic Operations

Comment: Let's cut out the gobbley gook about LOS, how it is figured, and how it relates to the project. Why not state it all in plain language (preferably English) that the average person can understand.

21-7 **Question:** **What does** the statement : "Existing PM peak hour traffic volumes for the Lebers Lane/Grover Lane/Northlake Way intersection are well below the Kitsap County Roadway Standards for the area roadway classification." mean? What are the peak traffic hours? How does this relate to the data displayed in Figure 9-2? And, why are only PM peak hour traffic volumes shown when AM peak hour traffic volumes are just as significant, if not more so?

Figure 9-2, 2010 Baseline with Project

21-8 **Question:** What do PM peak traffic volumes have to do with anything important? Only 23 vehicles leaving the intersection to the north and 4 to the south? Why should we care only about PM traffic in 2010, unless it is to reinforce the idea that the project is really no "big deal" and would have no significant traffic impacts? Come on! What about the stated 186 vehicle trips per day once the project is up and running? Is the projected 2010 data just more smoke and mirrors to mislead the reader? How about some incremental traffic volumes projected over time to provide the reader a more realistic expectation of the consequences of project approval?

21-9 **Comment:** Daily trip data in Table 9-2 seems to overlook the possibility of logging truck transits. This seems rather at odds for a tree farm operation with stated annual harvest projections.

Northlake Way and Lebers Lane Intersection Analysis Results

21-10 **Question:** How about an explanation, in plain language (preferably English) explaining Level-of Service (LOS) and how it applies to what, if anything , the reader would be concerned with.

21-11 Pg. 9-11 "The amount of traffic expected on the roadway, even with the conservative trip generation assumptions, is well below the capacity of the roadway, and much lower than the County plans for on typical residential roadways."

Question: What roadway? Northlake Way? Lebers Lane? One familiar with the area would have to assume

21-11 Lebers Lane, because Northlake Way, also a residential roadway and "Minor Arterial", is presently stressed to the limit with peak AM and PM traffic.

Comment: We need some clarification on this issue.

Comment: The Leber Bros. Logging Company and Port Blakely Mills, both previous owners/managers of the Ueland Tree Farm property, used the Lebers Lane/Northlake Way intersection for years without a problem, with loaded logging trucks exiting to the north down Northlake Way.

Pg. 9-1 Lebers Lane "is a County road classified as a Very Low Volume Local Road".
Grover Lane "is also classified as a Very Low Volume Local Road".
"Northlake Way is a two-lane Minor Arterial".

21-12 **Question:** Given the above, what is the driver for the modification (improvement) of the Lebers Lane/Grover Lane/Northlake Way intersection? Is it the Ueland Tree Farm? Or, is it Kitsap County looking for a "free ride" on so-called road improvements?

Comment: If it is the latter, this places Kitsap County in an advocacy position for the intersection project and the County can no longer be trusted as a fair and impartial judge of the overall Ueland Tree Farm Mineral Resource Development Project.

Question: Considering the current state of the economy, would Kitsap County initiate reconstruction of this relatively minor intersection if it was to be financed by the citizens (tax-payers) of Kitsap County?

Closing Comments:

21-13 The Ueland Tree Farm Mineral Resource Development Project, as proposed, should not be approved unless it can be positively determined to be compatible with the existing, long established, residential community. We feel that this would not be possible with the proposed site access via Lebers Lane and with the operation of a Concrete Batch Plant at Gravel Mine Site A. Both of these objections could be negated if the proponent moved the access to the southern end of the property and moved the Concrete Batch Plant to Gravel Mine Site B, as suggested in our General Comments and Comments on Alternate Access Evaluations.

COMMENT LETTER NO. 21 – JOHN & ROBERTA MIKESELL

21-1.	Comment acknowledged.
21-2.	As stated in the EIS, the greatest concentration of site development would occur at the onset of the project, when the operational facilities are built. Each of the EIS sections discusses potential impacts as they relate to site development and operation. The 50-year and 32-year periods for development refer to the operational lifespans of each of the alternatives. It was not the intention of the EIS to imply that the impacts of construction of the facilities would be evenly spread out over those time frames.
21-3.	See response to Comment 3-2.
21-4.	The project proposal includes intersection improvements at Lebers Lane/Grover Lane and Northlake Way, as well as channelization and road widening. See also responses to Comments 3-2 and 6-2, and the Traffic Report for additional detail on proposed roadway modifications.
21-5.	The proposal would not require or result in any homes or property being "taken." All property purchased by UTF along Lebers Lane has been, and would continue to be, voluntary. There will be no displacement impacts. The design of the project and proposed mitigation measures, in combination with the County CUP process, are expected to protect area properties from adverse impacts; thus, property value impacts should be minimized. The principal purpose of the SEPA process is to identify and mitigate impacts to the environment. SEPA does not require cost-benefit analysis for weighing the relative merits and/or drawbacks of alternatives (WAC 197-11-450).
21-6.	Residents that live along Lebers Lane will utilize the proposed sidewalk. See responses to Comments 3-13 and 21-5.
21-7.	Level of Service (LOS) is a qualitative measurement of delay represented by letter grades A through F; the lower the letter, the more delay. A LOS of E or F is typically considered "congested" and corresponds to delays that are about one minute or greater. The basis for calculating peak hour volumes is described in the Traffic Report and is based on estimates for highest average project traffic during the early part of the morning when employees arrive at the site and depart with the first loads of the day (AM peak hour), as well as in the evening when trucks return to the site and employees depart (PM peak hour). These peak hour traffic volumes for the project are then used in the traffic analysis to evaluate the potential level of delays at intersections and areas roads. This is done to ensure that the intersection and road segments have sufficient configuration and capacity to move all vehicles in a safe and timely manner. The statement referenced in this comment means that there is relatively low volume of traffic given the capacity of the road, and that there are correspondingly low levels of congestion and delay. See also responses to Comment 3-6 and 5-2. As shown in the Traffic Report, AM and PM peak hours for the project are the same (35

	trips). Traffic counts conducted on Northlake Way show that PM peak hour volumes are typically 25 percent higher than the AM peak hour. Traffic analysis was therefore conducted using the PM peak hour volumes to ensure that the LOS (congestion/delay) analysis was done using the highest potential peak hour traffic volumes.
21-8.	The traffic analysis followed standard engineering procedures for analysis of potential project impacts. These procedures are described in Kitsap County regulations and are based on the current edition of the Highway Capacity Manual (HCM) published by the Transportation Research Board. The HCM is the acknowledged source for determining capacity of road segments and intersections. Also refer to response Comment 3-6, 3-8 and 20-7. The projected 2010 traffic volumes represent expected conditions at full build out, and therefore the maximum number of truck trips from the project. This maximum traffic volume was then used for analysis of potential impacts. It is possible that truck traffic may require several years to reach full build out conditions. An analysis based on incremental increase in traffic volumes would be less conservative from a traffic standpoint, and was not included. Full build out traffic volumes were used for analysis in order to provide a worst-case basis for evaluation of potential traffic impacts.
21-9.	Due to the relatively small harvest unit size (less than 30-acres) logging truck traffic will be sporadic in nature and limited in volume and will not result in significant changes to average or peak project traffic volumes. Logging truck traffic, when it occurs, will be coordinated with mine traffic to ensure that combined truck trips do not exceed allowed levels.
21-10.	Refer to the response to Comment 21-7.
21-11.	"Roadway" as referenced in this comment, refers to Lebers Lane.
21-12.	The proposed improvements to the Lebers Lane/Grover Lane/Northlake Way intersection are not listed in Kitsap County's Transportation Plan. Rather, the UTF traffic analysis has identified the proposed improvements as mitigation measures to help reduce traffic safety impacts from the proposal, as required by the SEPA EIS process pursuant to WAC 197-11-400.
21-13.	Comment acknowledged.

Comment Letter No. 22

Helen Miller **PO Box 788 Bremerton, WA 98337 Saturday, March 28, 2009**

Kitsap County
Department of Community Development
619 Division Street
Port Orchard, WA 98366-4682

Attn: Dave Greetham:

Subject: **Comments on Ueland Mineral Resource Development - DRAFT EIS**

I am in favor of the Proposed Development of Sand, Gravel & Basalt Mineral Surface mines on a portion of the 1716 Acre property Proposal as presented by Ueland Tree Farm, as well as the other proposed developments.

Having attended over 95% of the briefings, study session, workshops, hearings, , and informal gatherings and associated field trips related to the development of the Ueland Tree Farm property. I am very familiar with the property after years of hiking the property during all seasons. (With permission)

During the development of the Ueland Tree Farm Kitsap Lake Property Draft Sub Basin Assessment document, many of us met with the Manager of the property on site together with various interested parties and Conservation and Preservation experts, including the Cascade Land Conservancy, and Forestry Management personnel, the Mountaineers, and neighbors and other interested citizens - and walked the property yet again to illuminate the study of the various proposals put forth.

22-1 The UTF development proposal is very impressive and business like; reflecting the amount of effort that went into its preparation. The principles made extraordinary effort of outreach to educate the public in advance of the proposed use of this forrested area; and addressing all and any concerns brought to their attention. Those of us in attendance at the numerous meetings during the Proposal development had our questions and concerns addressed by the presenters and project management .

I have studied the UTF Kitsap Lake Proposal Sub Basin Assessment and related documents in detail and have found them to be very comprehensive and self explanatory. In fifteen years of intense personal involvement in Kitsap, Mason and Jefferson counties, in state and local land use issues, - I have not witnessed such sincere dedication, thoughtful land use planning; and voluntary expenditures of vast sums of personal money by the principles.

Much personal time was donated by the project manager and others to make this a landmark development in Kitsap County, preserving wildlife habitat whilst skillfully integrating some carefully selected compatible business practices and development - and at the same time setting aside large portions of the property as managed Land Trusts and Greenbelts for public use.

In the final analysis it must be recognized, that UTF is a business which will enhance County employment and Tax Rolls.

This type of responsible Land Stewardship is indeed rare in Kitsap County - and is a major reason for endorsing this project. ---- **Good for the Land and Good for Kitsap**.

Sincerely, Helen Miller

Helen Miller

COMMENT LETTER NO. 22 – HELEN MILLER

22-1.	Comment acknowledged.

Comment Letter No. 23

PB
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March 30, 2009

Ueland Tree Farm Mineral Resource Development Project
Draft Environmental Impact Statement
c/o David Greetham, SEPA Coordinator
Kitsap County Department of Community Development
614 Division Street, MS-36
Port Orchard, WA 98366

RE: Comments on Draft Environmental Impact Statement (DEIS)

Dear Mr. Greetham:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the *Ueland Tree Farm Mineral Resource Development Project*. Port Blakely owns approximately 440 acres of property within the City of Bremerton adjacent to the Ueland property. As a neighboring landowner, Port Blakely will be affected by the mining activities that Ueland will undertake, and for that reason we have an interest in the scope and manner of operations and appropriate mitigation measures. We have reviewed the Draft EIS and would like to provide the following comments.

During the fifty year life of this project the urgency of the mitigation measures could be diluted as the project matures. Therefore, Kitsap County must ensure these mitigations standards are maintained over the life of the project. The mitigation elements important to our property are:

1. Gravel and Quarry mining limited to 10 acres that are cleared, mined and reclaimed sequentially.
2. Air quality mitigation and monitoring so toxic air pollutants would be below the thresholds for Acceptable Source Impact Level (ASIL) established by the Puget Sound Clean Air Agency.
3. Establishing buffers, berms and planting vegetation to mitigate noise and visual impacts.
4. Hours of operation limited to 7am to 6pm. (This was unclear in sections of the DEIS. References were also made that operations will be limited to 7:30am to 5pm—which would be our preferred time to operate.)
5. Site reclamation complete within two years of the completion of operations at any particular gravel mine or quarry.
6. Roadway/pedestrian safety by limiting speed in the gravel and quarry pits and access roads along with wider shoulders and sidewalks.

23-1

The mitigation measures Ueland Tree Farms is proposing appears to be adequate and continuing their good neighbor policy and cooperation should help mitigate the projects impacts on adjoining properties.

Sincerely,

Tim Diller
Vice President, Finance
Port Blakely Communities

COMMENT LETTER NO. 23 – PORT BLAKELY COMMUNITIES

23-1.	Comment acknowledged. Kitsap County intends to ensure that mitigation measures identified in the EIS are incorporated into binding permit conditions as appropriate.

From: Toni Shauers [shauers@wavecable.com]
Sent: Thursday, March 26, 2009 10:30 PM
To: dgreetha@co.kitsap.wa.us
Subject: Ueland Project/Northlake Way

Dave Greetham:

I was at the meeting the other night and would like to express my opinion.

24-1 I think the Ueland project is completely inappropriate for the Northlake Way area. This is a residential area with many private driveways, school busses, bus stops, and children. 186 dump trucks per day would definitely impact the quality of life in this neighborhood and not in a good way. Why would a project

24-2 of this magnitude even be considered when it's so close to Chico Creek? The flooding of this creek in December 2007 was devastating to those affected. The Ueland study was completed before this date and that concerns me.

24-3 I doubt that all of the Northlake Way homeowners know about this project. Looking at a web site that has page upon page of technical documents with reports of traffic counts, etc., is not informative for the average (non-engineering background) person. I would suggest that some type of a direct mailing (in plain English) needs to be done to EVERYONE that lives on Northlake Way and it's side roads, so that they will all be informed before the Public Hearing date.

24-4 If the Ueland property has to be developed in this manner and we have to have all of this commercial activity in a residential neighborhood then it would be far more tolerable if they used a different access road, perhaps to the South of the property, off Werner Road, where commercial activity already exists. Use the Leber Lane road for the public access to the trails, and also perhaps for some small Ueland vehicle traffic (but not the big trucks).

v/r
Toni Shauers
2756 Northlake Way NW
Bremerton, WA 98312
(360) 373-1205

COMMENT LETTER NO. 24 – TONI SHAUERS

24-1.	See responses to Comments 3-3, 3-6, 3-13, and 5-2.
24-2.	See response to Comment 2-10. The Hydrologic Study for UTF was revisited as part of the third-party review for this EIS. All applicable permit requirements will be met prior to project approval.
24-3.	See response to Comment 3-23. A Notice of Public Hearing sign will be posted prior to the CUP hearing.
24-4.	See response to Comment 3-2.

From: Sharon Tucker [serktucker@gmail.com]
Sent: Tuesday, March 31, 2009 12:04 AM
To: dgreetha@co.kitsap.wa.us
Subject: Ueland Tree Farm

25-1 On behalf of the Tucker Family please reconsider the proposed development of this property. The valley below, on Taylor Road has seen enough change to last a lifetime from over development. This last flood left us stranded for weeks, primarily due to land development. Nature needs to be left alone. Many of us who live on Taylor Road lost real estate as well as our access to our homes for weeks. If single family dwellings are considered for this property we would not object. This type of development is wrong for the community and survival of Chico Creek.

25-2 We find it incredulous that the development of this type would even be considered when looking at what has already happened to the creek. This project would only lead to more sediment running down hill into the creek. Chico Creek is one of the highest producing chums salmon creeks in the county and needs to be protected.

The amount of run off from gravel and quarry mining would increase the drainage/sluffing into creek exponetialy and unnecessarily disrupting the already struggling survival of Chum in Chico creek. The land owners cannot afford to lose more real estate by the disruption of this over worked creek.

25-3 NOISE The noise produced by gravel processing and rock quorieng has, in the past disrupted the envirnment through out the valley.

25-4 STREAM QUALITY the flow levels in the two streams has increased from the logging, clear cutting and site development. The increased sedament in the stream has increased the delta at the mouth of the stream, in Chico Bay has increased in relation to the up stream development and has filled in nearly half of the bay. I would like to see some numbers on the yearly increese in flow and silt levels in the stream by year and amount of rain.

25-5 BREMERTON WATERSHED The water supply for the city of bremerton will be impacter at the Union river dam and the wells the city uses.

COMMENT LETTER NO. 25 – SHARON TUCKER

25-1.	Comment acknowledged.
25-2.	See responses to Comments 2-3 and 2-15.
25-3.	Comment acknowledged.
25-4.	See responses to Comments 2-3 and 2-15.
25-5.	Evaluations conducted as part of this project indicate that there will be no impact to City-owned wells.

From: Richard Uhinck [ricku260@gmail.com]
Sent: Sunday, March 29, 2009 9:16 PM
To: dgreetha@co.kitsap.wa.us
Subject: Ueland Tree Farm

David

26-1 Just a few lines with my concerns about development of ueland tree farms, first i have concerns about children waiting for school buses on north lake way with the increase of 186 trucks per day and the safety of just tyring to get out on to north lake way.Second the pollution, noise and
26-2 hazards of operations of a gravel pit and other mining activities in the water shed.At least look
26-3 for a new exit like warner road where there are commercial trucks all ready! I really believe this is the wrong project for this area as the impact is so great.

Thanks

Rick Uhinck

COMMENT LETTER NO. 26 – RICHARD UHINCK

26-1.	See response to Comment 3-13.
26-2.	See responses to Comment Letter 2.
26-3.	See response to Comment 3-2.

Comment Letter No. 27

Jeramy and Shonda Wahrmund
2520 Northlake Way
Bremerton, WA
38362

SUBJECT: UELAND TREE FARM MINERAL RESOURCE DEVELOPMENT PROJECT DRAFT EIS

David Gretham, SEPA COORDINATOR
KITSAP COUNTY DCD
614 Division Street, MS-36
Port Orchard, WA 98366

Mr. Gretham,

Although I am concerned that this letter will fall on deaf ears, I do want to address some of the concerns I have regarding the proposed development project. I am sure each issue has been addressed, but feel I need to stress these concerns. Please review the following listed below:

27-1 1. Increased traffic in the area. Leber Lane is hardly a road that was planned or developed for major industrial traffic. As a result, people moved here with the expectation of some degree of relative peace and quiet. This project would basically put a bullet in each property owner's head in regards to property value, potential resale, and community cohesion. Granted, not all the folks along the planned commence route are six figure income families but should still be afforded the protection to ensure their way of life is

27-2 not overly disturbed. In addition, there are the two schools, one public and one private, along the proposed route that will be greatly affected by the increased traffic and potential danger to small children.

27-3 2. Impact regarding noise. I cannot agree with the wording regarding noise from this project. It will create a major and devastating impact to the area's peaceful nature. You can't tell me that trucks, heavy equipment and blasting will not affect the entire area along the lake and out to the highway. Although there are not a lot of people in that area, it is fair to say that many families will be impacted. As mentioned above, people live here in a semi-rural area to be removed from the noise and distractions of heavy industry. This, again, will devastate the area and the people who live here.

27-4 3. Environmental Impact for Chico Creek. This concerns me the most and the potential it can have on the county's tax payers. We know that salmon in the region are not recovering. Granted, Chum Salmon do not have the value as other species, but I am concerned as to what this will do to the watershed. More

27-5 importantly, I am worried about the litigation that will be opened by environmental groups if this project goes forward and the taxes I will have to pay in order to defend a project I didn't support in the first place. Not to mention the litigation for protecting the wetlands and other issues which may come up. Heck, I may even find myself calling up some of the groups to look at this project in order to have a less biased outside opinion look at the issues.

27-6 Those are the major concerns. As you know, this is not a minor project and will impact the citizens of the area greatly. After review, I still see a lot of holes in the draft and the potential for UELAND to over develop the area and kill a peaceful community within the county. 60 years ago, when the area was not residentially developed like it is today, I would have said yes. But now, I have to say no.

Very Respectfully,

Jeramy and Shonda Wahrmund

COMMENT LETTER NO. 27 – JERAMY & SHONDA WAHRMUND

27-1.	See responses to Comments 3-3, 3-6, and 21-5.
27-2.	See response to Comment 3-13.
27-3.	The noise from blasting and impacts to humans is discussed in Section 7.4.2 of the EIS. It is acknowledged that blasting noise will have a significant impact on animals in Section 6.4.2. UTF mining operations will be consistent with all applicable regulatory and permit requirements, to reduce impacts as much as possible. See also response to Comment 5-4.
27-4.	See responses to Comments 2-3, 2-12, and 2-15.
27-5.	Comment acknowledged.
27-6.	Comment acknowledged.

Please Deny the Uleland Company Access Plan

Rural and bucolic …

Out of town Tourists and Visitors should be welcomed by scenery not gravel trucks!
Please don't let Northlake Way become the Navy Yard Highway of old!

28-1 "Limiting management activities to 7:30am to 5:00pm, with no ***regular*** hauling on weekends or holidays. This will continue to allow the public access to the forest roads at night and on weekends." This statement was lifted directly from the Traffic Safety Impact Report paid for and published by Uleland Tree Farm. The information reported in this document is **Outdated and Dubiously Timed** to give an inaccurate view of the traffic patterns and use of Northlake Way on an aggregate basis. (Parametrix. 2007. Traffic Study - Ueland Tree Farm Mineral Resource Development. Prepared by Parametrix, Bremerton, Washington.December 2007).

28-2 Werner Road may not be the most fiscally attractive approach for Uleland's enterprises but it would be the safest. If all else fails limit the trucks to southbound ingress and egress.

Focus should be on:

28-3
- **Bicycle Plan Route Summary by Project Segments-** http://www.kitsapgov.com/PW/maps/Bike_Route_2004.pdf
- **Bremerton Seventh-day Adventist Christian Church-**Taylor Road
- **Kitsap Adventist Christian School** -Taylor Road
- **Camp McKean**
- **Camp Union Pizzeria**
- **Camp Wesley Harris Naval Reservation**
- **Country Nursery & Gardens (and Gift Shop)** COUNTRY WISHES GIFT SHOP (360) 478-0288 2075 Seabeck Hwy Bremerton WA 98312
- **CROSBY**: The hamlet on Seabeck Highway between Hood Canal and Chico will gather for its annual Independence Day picnic. It will take place this Sunday between 2 and 7 p.m. at the Crosby Community Club. The lineup includes food, entertainment, sports, contests and horseshoes.
- **Farrell Gas Company** 1405 Lumsden Road 360/373-2515 or 800/441-3444
- **Green Mountain Mountain Bike Trails Bremerton Washington**
- **Holly Ridge Center** 5112 NW Taylor Road, Bremerton, WA 98312-8837
- **Holly Ridge Center Adult Employment Services**
- **Horse and Cow Tavern**
- **Hubert's Christmas Tree Farm**
- **Kitsap County Central Road Shed Dist.#3**
- **King's West Christian School**
- **King's West Day Care and Preschool**

Comment Letter No. 28

- **Kitsap Forest Theatre-** May 24, 25, 30, 31 June 6, 7, 13, 14 August 1, 2, 8, 9, 15, 16, 22, 23
- **Kitsap Golf and Country Club**
- **KITSAP LAKE PARK-** Hydro Racing Keeps Its Fans Roaring at Kitsap Lake
- **KITSAP RIFLE and REVOLVER CLUB**
- **Lake Symington**
- **Lake Tahuya**
- **LUTHERHAVEN- 09 Schedule of Events**

Cut, Crop & Quilt Retreat AT LUTHERHAVEN March 6-8, 2009

Lutherhaven Ministries Annual Corporation Meeting AT LUTHERHAVEN, 1 PM March 14, 2009

Women's Retreat AT LUTHERHAVEN March 27-29, 2009

Creation Day! AT LUTHERHAVEN April 24, 2009

AT LUTHERHAVEN May 8-10, 2009

Golden Agers' Day Out AT LUTHERHAVEN May 13, 2009

Summer Worship Services BEGIN JUNE 9, 10:30 AM, THRU AUGUST 16 Zoerb Chapel, Lutherhaven Join your Lutherhaven family for Sunday worship this summer! Bring a few friends, or come and meet some new ones!

Join us for Dedication Day, Sunday, June 9 at Lutherhaven *Re-Dedicate the Zoerb Chapel to the Glory of God!*

Annual 4th of July Festival Weekend AT LUTHERHAVEN July 3-5, 2009

28-3 Mother/Daughter Weekend AT LUTHERHAVEN July 31-August 2, 2009

July Summer Worship Services 10:30 AM, THRU AUGUST 16 Zoerb Chapel, Lutherhaven August 7-9, 2009

Golden Agers' Day Out AT LUTHERHAVEN October 14, 2009 For empty nesters, older adults, retirees, and adult ministry groups from your church...a great day out at one of the most beautiful times of year at camp!

Cut, Crop & Quilt Weekends AT LUTHERHAVEN :October 16-18, 2009 ,October 30 - November 1, 2009 Amazingly popu lar get-togethers for the "crafty" in all of us!

The Great Escape! AT LUTHERHAVEN 3rd - 8th Grade Weekend November 20-22, 2009

Deck the Halls! AT LUTHERHAVEN December 4-6 & 11-13, 2009 December 3-5 & 10-12, 2010

- **Misery Point Launch -Planning**
- **19th Hole Tavern**
- **Romeo's Bar and Grill**
- **Scenic Beach State Park Kitsap County**
- **Seabeck Conference Center**

- **Seabeck Marina** The project approved by Kitsap County's hearing examiner includes a 16-foot-wide floating concrete breakwater, which could support transient moorage, plus 1.66 acres of docks and floats to moor up to 200 boats. http://seattletimes.nwsource.com/html/realestate/2004252421_realneighborhood02.html" The 2000 census found the population of Seabeck was 3,412, and recent estimates (3/08) put it at about 5,000. While housing here is far from dense, for longer-term residents the growth has been startling."

- **Barbie's Seabeck Bay Cafe**-When I have out-of-state visitors who want to see the "real" Northwest outside of Seattle, I bring them to Seabeck to eat at Barbies and then to Scenic Beach State Park to see the awesome sight of the Hood Canal and Olympic Mountains while walking on oyster beds from a reviewer who drives over from Tacoma. - 15384 Seabeck Hwy NW-http://local.yahoo.com/info-22235037-seabeck-bay-cafe-seabeck
- **Seabeck Pizza Market**
- **Star Valley Grocery**
- **WILDCAT LAKE COUNTY PARK** Next to Kitsap Lake, perhaps the best fishing in the county can be found at Wildcat Lake, where in addition to the annual plants, anglers might find some larger holdovers and perhaps even one of those big landlocked coho salmon the state dropped in there a few years back. Wildcat has a boat launch.
- **WILDCAT TRAIL-**Kitsap Peninsula Mountain Biking
- **WILDCAT BEAVER POND TRAIL-**Kitsap Peninsula Mountain Biking

28-3

COMMENT LETTER NO. 28 – ROBIN WALSTER

28-1.	See responses to Comments 3-3, 3-6, and 3-8. The Traffic Analysis was revisited following release of the DEIS, to ensure that assumptions, methodologies, and conclusions remain accurate and up to date.
28-2.	See response to Comment 3-2.
28-3.	Comment acknowledged.

Comment Letter No. 29

Kitsap County Board Of Commissioners
Department Of Community Development MS-36
Dave Greetham, SEPA Coordinator
Environmental Programs Division
614 Division Street, Port Orchard, WA 98366

Dear Commissioners,

This letter is in regards to the proposed development of sand, gravel and basalt mines on a portion of a 1,716 acre commercial forest land property owned by Ueland Tree Farm LLC.

We would like to first note that Dave Greetham has been a valuable resource to us since this process was first proposed. He has responded to all our requests for information and answered any questions we have had about this proposed development.

29-1 Also, we would like to note that Mark Mauren of Ueland Tree Farm LLC has also been extraordinarily helpful to us over the last two years as we have watched first the SEPA process, and then the draft EIS process unfold. Mark has been very forthcoming with information not only on the project, but with hard data on the geologic, hydro geologic, and traffic effects of this undertaking.

Again, the Ueland family has been very open and forthcoming to us with information over the last two years. In our opinion, keeping this site in one piece while developing only 152 acres and protecting Dickerson, Kitsap, and other tributaries of Chico creek is the best route to go. Traffic-wise, this project *must be as unobtrusive to the neighborhood as possible*. We understand the need for approximately 183 trips to and from this site daily at full build out, but better long range planning is needed for our neighborhood to accommodate this. Traffic problems on Northlake Way cannot be
29-2 solved by Kitsap County alone. When the city of Bremerton absorbed the Port Blakley lands above Kitsap Lake, they became a partner in this process. Those lands cannot be developed without a north and a south access, or at least that was what the county claimed ten years ago. That north access, as we understand it, is intended to be Lebers Lane.

Comment Letter No. 29

29-3 We would like to make one suggestion. Before the final EIS is issued, the neighborhood should be able to see on paper, down to the parcel number, where all the road improvements are going and what lots will be affected. We, for instance, do not know if our lot will be affected by the widening of Northlake Way to accommodate a turn lane.

29-4 This being said, let us make it clear that we whole-heartedly support this project. We believe that Ueland Tree Farm LLC will be responsible stewards of its lands. It is also our sincere hope that this will lead to the revitalization of the affected areas of the Chico Creek Watershed, one of the "Crown Jewels" of Kitsap County. All in all, this is a great opportunity for showing that development and proper resource management need not be mutually exclusive.

We trust the Ueland family. We welcome them to our neighborhood.

Kenneth & Patricia Widell
2341 Northlake Way NW,
Bremerton, Wa. 98312
(360)405-0642 kenpat@wavecable.com

COMMENT LETTER NO. 29 – KENNETH & PATRICIA WIDELL

29-1.	Comment acknowledged.
29-2.	See responses to Comments 3-2 and 3-6.
29-3.	Typically, an EIS does not include information on a parcel by parcel basis. The EIS is intended to provide decision makers with a comprehensive understanding of impacts and mitigation measures associated with the entire project on a short and long term basis, in addition to disclosing potential impacts to all potentially affected individuals. Parcel-specific information is typically reviewed during the permit application process, when proposed designs have been finalized. The information shown in the EIS reflects the current understanding of the proposed roadway improvements. Additional information will be made available as it is finalized by the project proponent. See also response to Comment 3-10.
29-4.	Comment acknowledged.

Appendix B

Ueland Tree Farm Mineral Resources Development

Access Feasibility Analysis

Ueland Tree Farm
Mineral Resources Development
Access Feasibility Analysis

May 22, 2009

Prepared for

Ueland Tree Farm, LLC

Prepared by

ESM Consulting Engineers, LLC
33915 1st Way South, Suite 200
Federal Way, WA 98003

253.838.6113 tel
253.838.7104 fax

www.esmcivil.com

UELAND TREE FARM
MINERAL RESOURCES DEVELOPMENT
ACCESS FEASIBILITY ANALYSIS

Prepared for:
UELAND TREE FARM, LLC
16419 Maplewild Avenue SW
Seattle, WA 98166

Prepared by:
ESM Consulting Engineers, LLC
33915 1st Way South, Suite 200
Federal Way, WA 98003

May 22, 2009 Job No. 1621-001-009

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1 Vicinity Map
2 South Access Road Alternatives
3 North Access Road Alternative

I. INTRODUCTION

The primary purpose of this report is to evaluate the feasibility of a single access point for the Ueland Tree Farm (UTF) Mineral Resources Development. In the Environmental Impact Statement (EIS) submitted to Kitsap County for this project, the Northlake Way/Lebers Lane NW intersection was analyzed by Parametrix in their report, "Traffic Study – Ueland Tree Farm Mineral Resource Development" dated December, 2007. This intersection and the Lebers Lane roadway were deemed to be a viable option as a single access location for the project. Through the EIS public comment period, Kitsap County received comments from the public about the access location. As a result, the County requested that a south roadway option be analyzed for viability. This report is in response to the County's request and analyzes two south access roadway alignments (Options 1 and 2) and compares them to the north access road alternative described in the project's EIS.

II. PROJECT DESCRIPTION

Ueland Tree Farm is a 1,716-acre property situated west of Kitsap Lake, approximately 5 miles south of Silverdale, and 5 miles northwest of Port Orchard. Specifically, it is located in Sections 12, 13, 24, and 25, Township 24N, Range 1W, and Sections 7, 18, 19, Township 24N, Range 1E (see Vicinity Map, Figure 1). The project proposes to develop two gravel mines and three basalt quarry areas located mainly on the northeast and southeast portions of the property.

III. SOUTH ACCESS ROAD FEASIBILITY ANALYSIS

Similar to the north access road, two south access road alternatives were analyzed using the American Association of State Highway and Transportation Officials (AASHTO) Green Book criteria in accordance with the Kitsap County Code. The potential south access road is classified as a recreational and resource recovery roadway with a design speed of 20 MPH for mountainous terrain. The at-grade railroad crossings are regulated by the Federal Railroad Administration standards which require the roadway to have less than 3 inches of grade change within 30 feet on either side of the railroad tracks.

The basis for selecting the two south roadway alternatives for analysis was as follows:

1. To provide the most direct route from existing roads on the south side of the project to UTF and the adjacent 440-acre property.
2. To avoid impacts to existing water bodies (i.e. lakes, streams, and wetlands).
3. To work with the existing topography in order to minimize grading impacts, especially within steep slope sensitive areas.
4. To make use of existing access roads where possible in order to minimize impacts to the environment.

Based on these criteria, two south road alternatives were analyzed. Other possible alignments were rejected on the basis of not meeting the above criteria. In both options, Werner Road was chosen to provide the connection from the existing roadway system to UTF and the adjacent 440-acre property. Werner Road provides the most direct connection to State Route 3 and keeps truck traffic away from large residential areas as much as possible.

The South Access Road (Option 1) alignment provides the most direct route from Werner Road to UTF and the adjacent 440-acre property while avoiding sensitive areas directly

south of Kitsap Lake. The alignment west of the railroad makes use of the existing access road which serves the BPA easement.

The South Access Road (Option 2) alignment attempts to avoid extensive grading within steep slope sensitive areas and work more with the existing topography especially along the west side of the railroad tracks. In order to accomplish this, the alignment has to cross the railroad approximately one mile south of the Option 1 crossing. When possible, the alignment utilizes existing roadways and avoids major sensitive areas such as Heinz Lake and Alexander Lake.

The following sections analyze the two south alternatives for construction feasibility as they relate to the grading of the roadways, the railroad crossing, storm drainage, sensitive area disturbance, and construction costs.

Roadway and Storm Drainage

Option 1

The South Access Road (Option 1) alignment would require purchasing eight (8) properties totaling approximately 236 acres in order to provide right-of-way access to UTF via the 440-acre adjacent site. The length of this roadway alignment from Werner Road to the south side of the adjacent 440-acre site is approximately 7,700 lineal feet (1.5 miles, see Figure 2). Within the adjacent 440-acre property, there are existing logging roads in easements that would allow trucks to access the UTF Mineral Resources Development project. The widths and grades of the logging roads would have to be adjusted to accommodate the truck traffic from the UTF project.

The roadway would require a maximum road grade of approximately 15% within steep slope areas. This would require approximately 50 to 60 feet of cut in areas near the railroad tracks. At the railroad crossing a design speed of 20 MPH would be required in order to meet the Federal Railroad Administration standards for an at grade railroad crossing and Kitsap County's standard for roadway grades and speed.

Storm drainage management for this access road would be difficult and expensive because of the steep slopes surrounding the roadway. Additional land would have to be purchased in order to accommodate the required detention and water quality facilities, disturbing more undeveloped land.

The cost of this roadway is based on three main factors: actual construction of roadway including materials and labor, property acquisition, and haul costs. Roadway construction is estimated to be $450 per lineal foot for a total cost of $3,500,000. The cost to purchase the eight (8) properties is estimated at $2,774,390 based on their assessed value. The actual value is dependent upon the market conditions and the willingness of the property owners to sell. The haul costs are directly affected by the type of road being traveled and the time that it takes to get from the work site to State Route Highway 3. The mineral resources development project would contribute 154 daily truck trips over 51 weeks per year for 50 years for a total of approximately 2.75 million truck trips over the life of the project. The cost to operate a truck including taxes and labor is approximately $2 per mile. This equates to approximately $22,550,000 hauling costs for a total haul distance from Gravel Mine A to State Route Highway 3 of 4.1 miles (2.7 miles on gravel; 1.4 miles on pavement). The overall cost of the South Access Road (Option 1) is estimated at $28,824,390.

Option 2

The South Access Road (Option 2) alignment would require purchasing six (6) properties totaling approximately 175 acres and permission to pass through the Bremerton Watershed in order to provide right-of-way access to UTF via the 440-acre adjacent site. The length of this roadway alternative from Werner Road to the south side of the 440-acre site totals approximately 13,200 lineal feet (2.5 miles, see Figure 2). As mentioned in Option 1, within the adjacent 440-acre property, there are existing logging roads in easements that would allow trucks to pass to the UTF Mineral Resources Development project. The widths and grades of the logging roads would have to be adjusted to accommodate the truck traffic from the UTF project.

The roadway would require a maximum road grade of approximately 15% within the steep slope areas. This would require approximately five to ten feet of cut in some areas of the roadway. At the railroad crossing a design speed of 20 MPH would be required in order to meet the Federal Railroad Administration standards for an at grade railroad crossing and Kitsap County's standard for roadway grades and speed.

Similar to Option 1, storm drainage management for this access road would be difficult and expensive due to the steep slopes surrounding the roadway. Additional land would have to be purchased in order to accommodate the required detention and water quality facilities, disturbing more undeveloped land.

The cost of this roadway is based on three main factors: actual construction of the roadway (including materials and labor), property acquisition, and Washington State regulated haul costs. Roadway construction is estimated to be $450 per lineal foot for a total cost of $5,900,000. The cost to purchase the six (6) properties is estimated at $2,367,780 based on their assessed value. The actual value is dependent upon market conditions and the willingness of the property owners to sell. The haul costs are directly affected by the type of road being traveled and the time that it takes to get from the work site to State Route Highway 3. The mineral resources development project would contribute 154 daily truck trips over 51 weeks per year for 50 years for a total of approximately 2.75 million truck trips over the life of the project. The cost to operate a truck including taxes and labor is approximately $2 per mile. This equates to approximately $30,800,000 hauling costs for a total haul distance from Gravel Mine A to State Route Highway 3 of 5.6 miles (4.2 miles on gravel; 1.4 miles on pavement). The overall cost of the South Access Road (Option 2) is estimated at $39,067,780.

Sensitive Areas

The south portions of the UTF property and the properties east of the railroad have extensive sensitive areas such as streams, wetlands, watershed corridors, and steep slopes. The roadway alternatives for access from the south have no option but to disturb these sensitive areas. Also, the majority of the land proposed for these alternatives is currently undeveloped, so impacts on wildlife would have to be considered. This is especially true for Option 2 due to the alignment which would need to avoid disturbing Heinz Lake, Alexander Lake, and various steep slopes. Figure 2 shows the locations of the sensitive areas in relation to the proposed roadway alignments.

The Option 1 road access alternative takes the most direct route from Werner Road to the 440-acre property while avoiding potential wetland sensitive areas. It does, however,

require considerable grading measures in order to provide an access road at the railroad crossing and across the steep slope area to the 440-acre property. In addition to the difficult grading required for this road, this alignment also disturbs a large amount of undeveloped area.

The Option 2 road access alignment attempts to avoid the steep slopes located near the railroad tracks. Unfortunately the closest location where the steep slopes veer away from the railroad tracks occurs approximately a mile south of the Option 1 railroad crossing. This would require the roadway to pass through the Bremerton Watershed, cross multiple steep slope areas, and a stream located on the project site. Similar to Option 1, this alignment also disturbs a large amount of undeveloped area.

Summary

Of the two south access road alternatives, the most feasible is Option 1. It has less lineal footage of roadway, less impact to sensitive areas, less impact to undeveloped land, and a lower cost to develop.

IV. NORTH ACCESS ROAD FEASIBILITY REVIEW

The north access road, as analyzed by Parametrix and shown in Figure 3, can utilize the existing Lebers Lane roadway for access to the project. The intersection of Lebers Lane and Northlake Way would require some improvements to bring the current configuration up to County standards for sight distance. As noted by Parametrix, the north access roadway alignment adjacent and east of the railroad would require 20 MPH design speed (a deviation from the County standards), in order to accommodate the existing grading constraints, existing properties and driveways, and an existing railroad grade. In order to increase public safety, Lebers Lane appears to warrant slower speeds due to its proximity to the railroad and Northlake Way intersection in order to increase public safety. For both the north and south access alternatives, the additional traffic that is anticipated to leave the project is approximately 186 daily trips and 35 PM Peak hour trips. According to Kitsap County standards, these volumes do not warrant additional offsite roadway improvements because of the minimal effect the project would have on the overall traffic corridor.

All improvements for the north access road would occur either in public right-of-way or within property owned by UTF. In addition, there are no reported sensitive areas other than the steep slopes located within the north gravel mine area These slopes would presumably be reduced once the gravel mine operation begins.

The cost of the north roadway is based on three main factors, actual construction of roadway including materials and labor, property acquisition, and Washington State regulated haul costs. Roadway construction is estimated to be approximately $1,600,000. The cost to purchase property is zero because all work would be performed on property owned by UTF. The haul costs are directly affected by the type of road being traveled and the time that it takes to get from the work site to State Route Highway 3. The mineral resources development project would contribute 154 daily truck trips over 51 weeks per year for 50 years for a total of approximately 2.75 million truck trips over the life of the project. The cost to operate a truck including taxes and labor is approximately $2 per mile. This equates to approximately $18,700,000 hauling costs for a total haul distance from Basalt Quarry C to State Route Highway 3 of 3.40 miles (1.65 miles on gravel; 1.75 miles on pavement). The cost of the overall roadway is estimated at $20,300,000.

V. NORTH ACCESS VERSUS SOUTH ACCESS

The north access road alignment, as noted above, is located outside of any known sensitive areas and all construction would be located in either public right-of-way or property owned by UTF.

The south access road alternatives, on the other hand, would have a considerable effect on the surrounding properties and environment. The South Access Road Alternatives, Option 1 and Option 2, require the construction of 5,500 feet and 7,500 feet of roadway on properties that are not owned by the UTF and are undeveloped forested land. In addition, the roadway construction within these properties and UTF would require extensive grading in sensitive areas and on steep slopes. Construction would also require logging roads within the adjacent 440-acre property to be widened and graded in order to accommodate the truck traffic for the project.

The following tables summarize the north and south roadway alternatives based on impacts to sensitive areas and associated costs.

Table 1: Sensitive Area Impact of Each Access Alternative:

Roadway Alternative	Sensitive Area Impact			
	Wetland or Lakes	Steep Slopes	Undeveloped Land	Bremerton Watershed
North Access Road	-	-	-	-
South Access Road (Option 1)	X	X	X	-
South Access Road (Option 2)	X	X	X	X

Table 2: Estimated Cost Impact of Each Access Alternative:

Roadway Alternative	Travel Miles*	Related Costs			
		Construction	Property Acquisition	Hauling	Overall
North Access Road	3.4	$1,600,000	$ -	$18,700,000	$ 20,300,000
South Access Road (Option 1)	4.1	$3,500,000	$ 2,774,390	$22,550,000	$ 28,824,390
South Access Road (Option 2)	5.6	$5,900,000	$ 2,367,780	$30,800,000	$ 39,067,780

*Travel Miles are based on the farthest distance within the UTF Mineral Resources Development Project to State Route 3.

It is ESM's opinion that the overall environmental impacts and cost of the south access road alternatives are far greater than that of the north access road. In addition, the north access road appears to benefit the adjacent properties, increasing the sight distance up to current Kitsap County Standards. The south access road would also adversely impact the overall environment to a larger extent than the north access road.

Disclaimer: This GIS data was obtained from an outside source and is intended for reference purposes only.
ESM makes no guarantee of its accuracy.

NORTH ACCESS ROAD

UTF PROPERTY

KITSAP LAKE

UTF PROPERTY

SOUTH ACCESS ROAD ALTERNATIVES

N

SCALE: 1" = 1500'

VICINITY MAP
FIGURE 1

ESM CONSULTING ENGINEERS LLC
33915 1st Way South, Suite 200
Federal Way, WA 98003

Disclaimer: This GIS data was obtained from an outside source and is intended for reference purposes only.
ESM makes no guarantee of its accuracy.

UTF PROPERTY BOUNDARY (TYP)

440-ACRE PROPERTY

STREAM TYPE Ns (INTERMITTENT) W/ 50' BUFFERS

UTF PROPERTY BOUNDARY (TYP)

KITSAP LAKE

KITSAP LAKE ROAD NW

PRICE ROAD NW

WERNER ROAD

RAILROAD

ROAD CONNECTION REQUIRED BY BOTH OPTIONS

SOUTH ROAD OPTION #1

SOUTH ROAD OPTION #2

APPROXIMATE STEEP SLOPE AREA (TYP)

HEINZ LAKE

ALEXANDER LAKE

125' BPA EASEMENT

N

SCALE: 1" = 800'

LEGEND

- UELAND TREE FARM PROPERTY
- ROAD CONNECTION FOR BOTH ALTERNATIVES
- SOUTH ROAD OPTION #1
- SOUTH ROAD OPTION #2
- EXISTING STREAM
- EXISTING LOGGING ROAD
- WETLANDS (BASED ON GIS INFORMATION)
- STEEP SLOPE AREA
- WATER BODY / LAKE
- BREMERTON WATERSHED

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SOUTH ACCESS ROAD ALTERNATIVES

FIGURE 2

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UTF PROPERTY BOUNDARY (TYP)

125' BPA EASEMENT

NORTH ACCESS ROAD

440-ACRE PROPERTY

RAILROAD

NW GROVER LN

NW LEBER ROAD

NORTHLAKE WAY NW

CHICO WAY NW

NORTHLAKE WAY NW

KITSAP WAY

WEST KITSAP LAKE RD NW

RAILROAD

KITSAP LAKE

N

SCALE: 1" = 400'

LEGEND

- UELAND TREE FARM PROPERTY
- NORTH ACCESS ROAD
- EXISTING LOGGING ROAD
- WETLANDS (BASED ON GIS INFORMATION)
- STEEP SLOPE AREA
- WATER BODY / LAKE

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NORTH ACCESS ROAD

FIGURE 3

Appendix C
Distribution List

FEIS Distribution List

Federal Agencies

U.S. Navy, Naval Base Kitsap

Tribes

Suquamish Tribe

State Agencies

Washington State Department of Archaeology and Historic Preservation
Washington State Department of Ecology
    SEPA Unit
    Northwest Regional Office
Washington State Department of Fish and Wildlife
    Gina Piazza, Area Habitat Biologist
    Lisa Wood, Fish Program Biologist
Washington State Department of Natural Resources
    SEPA Unit
    Geology and Earth Resources Division
Washington State Department of Transportation, Olympic Region

Regional and Local Governments

Central Kitsap Fire and Rescue
City of Bremerton, Planning Department
Kitsap County
    Department of Community Development
    Department of Parks and Recreation
    Department of Public Works
Kitsap Regional Library
Puget Sound Clean Air Agency
Puget Sound Partnership

Citizens and Local Organizations

Adair, Kim
Beck, Michael & Susane Stayrook
Central Kitsap School District, Richard Best
Dick, Charles - Seventh Day Adventist Church
Erenn
Fetters, Debbie

Fleming, Bernie JMW
Guizzetti, Sheila
Holly Ridge Center - Roxanne Bryson
Hunt, Chris & Holly
Kitsap Lake Neighborhood Association
McCoy, Paul
McIntosh, Bonnie
Mikesell, John & Roberta
Miller, Helen
Port Blakely Communities
Shauers, Toni
Tucker, Sharon
Uhinck, Richard
Wahrmund, Jeramy & Shonda
Walster, Robin
Widell, Kenneth & Patricia