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JEFFERSON COUNTY  
RUTH GORDON, CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR JEFFERSON COUNTY

IRON MOUNTAIN QUARRY, LLC, a )  
Washington Limited Liability Company, ) NO. 10-2-00181-5  
and POPE RESOURCES, a Delaware )  
Limited Partnership; )

Petitioner/Plaintiffs, )

vs. )

JEFFERSON COUNTY, a Washington )  
Municipal Corporation, acting through its )  
Department of Community Development; )  
and STACIE L. HOSKINS, Planning Mana- )  
ger, Jefferson County Department of Com- )  
munity Development; )

Respondents/Defendants. )

) DECLARATION OF STACIE L.  
) HOSKINS, JEFFERSON COUNTY  
) SEPA RESPONSIBLE OFFICIAL

I, STACIE L. HOSKINS, declare as follows:

1. I am over the age of 18 years and have personal knowledge of all matters set forth herein.
2. Among my qualifications I have a Bachelor of Science degree from the University of Colorado at Boulder.
3. I am the SEPA Responsible Official for Jefferson County, a position I have held since 2005. In this capacity, I have directed the preparation of programmatic and project-specific environmental impact statements. I have also had responsibility

DECLARATION OF STACIE L. HOSKINS - 1

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for implementing all other forms of environmental review provided for under the State Environmental Policy Act ("SEPA"), Ch. 43.21C RCW.

4. In addition to my role as SEPA Responsible Official, I am the Planning Manager.
5. As the Planning Manager I oversee the Development Review Division and Long Range Planning Division of the Jefferson County Department of Community Development or "DCD."
6. I have been involved in current and long-range planning at Jefferson County since 2001.
7. I make this declaration to provide the Court with a description of the grounds upon which I decided to issue the determination of significance ("DS") for the stormwater management permit sought by Iron Mountain Quarry ("IMQ").
8. This DS was issued on March 22, 2010.
9. With respect to the IMQ proposal, I paid close attention to the criteria set forth in WAC 197-11-330(3)-(5). These criteria provided a useful checklist for my review when assessing the environmental significance of IMQ's proposal.
10. These criteria provided a framework for me in considering whether the IMQ proposal has significance both on a relative and an absolute basis; whether the proposal has several marginal impacts that in combination may be significant; whether it may be difficult or impossible to forecast the proposal's environmental impacts with precision because certain variables may not be easily predicted or values cannot be quantified; whether the proposal would affect especially sensitive or socially important environmental resources; whether the proposal

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would or may establish a precedent for future actions with significant effects; and whether the proposal involves or affects the public health or safety.

11. I assessed the significance of the IMQ proposal on both its context and intensity. I considered the duration of the proposal and the duration of its likely impacts. I used my general background, training, and professional experience.
12. I did not rely upon any specific formula or quantifiable test to decide that the IMQ proposal has a reasonable likelihood of more than a moderate adverse impact on environmental quality.
13. I had good cause to determine that the IMQ proposal is likely to have a probable significant adverse environmental impact.
14. The basis for my determination relates, in part, to certain categories of information that are represented in the certified record for review in this matter.
15. First and foremost, I possessed the IMQ application materials, including the stormwater management permit application, the expanded SEPA environmental checklist, and the wetland delineation and mitigation plan.
16. Second, I considered information known to me regarding various other mining proposals in nearby portions of Jefferson and Kitsap counties. These included the Mats Mats quarry operation, the Mason/Shine Quarry expansion, and various proposals of Fred Hill Materials. These materials also included information related to a proposal of IMQ to amend the Jefferson County Comprehensive Plan to adopt a mineral resource land overlay for the site that is now the subject of the DS.

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17. I also relied on my knowledge regarding the Jefferson County Comprehensive Plan, the environmental review documents associated with the comprehensive plan, and the existence of general land uses and planning designations for nearby lands, including the Port Ludlow Master Planned Resort.

18. I took great care to carefully review, in detail, the IMQ application materials. Those materials were voluminous and I fully appreciated the amount of specialized scientific and technical knowledge they contained.

19. When reviewing the IMQ application materials, I questioned whether the assumptions made by the technical experts were accurate and whether they made sense. I questioned whether reasonably likely impacts of the proposal were addressed at all. I questioned whether the technical reports established the absence of likely environmental impacts exceeding the level of SEPA significance.

20. In addition, I considered whether mitigation standards, if proposed, were adequately defined or were intended to be determined at a later date.

21. The IMQ materials did not include any report or assessment explaining how the various technical reports tied together.

22. There was no overview-level analysis or narrative discussion to explain the interrelationship of the specific technical reports; there was no discussion of how the proposal would relate to other large mining operations in the vicinity of the IMQ proposal.

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23. Also missing was any discussion of compatibility between the likely range of impacts and other existing and planned land uses in the vicinity.

24. The lack of any overview-level analysis of the IMQ proposal also meant that there was an absence of detailed analysis of IMQ's operational plan, particularly with respect to sequence of mining, segmental reclamation, performance standards for mitigation, or how any of these topics could be integrated in an appropriate manner with the several specialized technical reports.

25. The mining operations and reclamation narrative was prepared by an undisclosed author of unknown technical qualification.

26. The operations and reclamation narrative itself does not reference the analysis of the various separate technical reports.

27. Notwithstanding the lack of an integrated discussion of the technical reports, I reviewed each of them carefully to understand their content and the extent to which they describe the environmental significance of IMQ's proposal.

28. After my review, I determined that the materials, while lacking in organization and overview analysis, were nonetheless reasonably sufficient for me to make a threshold determination as required by WAC 197-11-310.

29. I also intended to comply with the SEPA obligation to issue a threshold determination at the earliest possible point in the decision-making process, as required by WAC 197-11-055. The principal features of the IMQ proposal and its environmental impacts were clear to me.

DECLARATION OF STACIE L. HOSKINS - 5

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30. The SEPA level of significance is likely to be exceeded for at least the following elements of the environment (a complete statement of issues that require analysis in an environmental impact statement is set forth in the DS itself):

- Transportation. The traffic impact analysis (“TIA”) for the IMQ proposal assumes that quarry truck traffic will make no use of the public road system beyond the point of ingress and egress between the site and SR 104. The likely area for quarry truck traffic is obviously much broader than just the point of ingress and egress. The TIA assumes that there will be no background traffic growth over the life of the 40-year proposal, which is not credible. The TIA does not contain any discussion of how the traffic study area was determined, and does not explain assumptions regarding background traffic growth. It is apparent that the site also has a point of ingress and egress to SR 19, which has different features and connectivity with other roads in comparison to SR 104, but this potential access is nowhere discussed or analyzed by IMQ.
- Air quality. The IMQ proposal materials state that dust and vehicle emissions will occur as a result of mining activities. The release of PM<sub>10</sub> particulates (particles that are smaller than 10 micrometers in size) has special significance for health impacts because this size particle can be deeply inhaled into the human lung. Hard rock mining generates PM<sub>10</sub> particulate matter, which is emitted in the form of fugitive dust. The IMQ materials contain no stated assumptions or discussion with respect to type or quantities of particulate emissions, vehicle and equipment exhaust, or other forms of pollution. There is no analysis of the extent

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to which fugitive airborne dust may escape the site even though it is virtually certain that the proposal will increase ambient particulate levels in the area.

- Noise. The IMQ proposal materials state that blasting noise is exempt from regulation and assume that, as a result, such noise has no environmental significance and requires no further review. These are invalid assumptions. The IMQ proposal materials indicate that noise attenuation is significantly related to topographic features of the site, but do not integrate this discussion with expected removal of topographic features as an expected direct consequence of mining activity.
- Environmental health (blasting/vibration). The IMQ proposal materials contain no analysis generally of the effects of blasting, although blasting is an operational element of the proposal. Vibration and flyrock risk (i.e., rock displaced by blasting and propelled beyond recoverable limits), are natural consequences of mining rock with the use of explosives.
- Land use. The IMQ proposal represents a long-duration intensification of mineral resource extraction in close proximity to the Port Ludlow Mater Planned Resort (“MPR”). Implicit in the IMQ proposal is the expectation that mining will continue for an additional forty (40) years in the vicinity of the MPR. The long-term extended mining use of the IMQ site is likely to affect land use patterns in the area, particularly in relation to the MPR. The MPR’s recreational uses and overall potential for expansion are likely to be affected.

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• Water/plants and animals. The IMQ materials discuss only a conceptual approach to wetland mitigation. Actual wetland mitigation design has not yet been addressed, even though wetlands and wetland buffers are likely to be affected by the proposal. Despite expected impacts, IMQ proposes to defer identification of actual wetland mitigation until after project approval has been granted and irrevocable resource commitments have been made.

31. I conducted an independent review to assess these and other issues of concern related to the IMQ proposal, with particular emphasis on analytical gaps contained in the IMQ application materials.

32. I also considered all mitigation measures that IMQ identified in its application materials. Based on these efforts, and with sufficient information in the record, I concluded that the IMQ proposal is likely to have a probable significant adverse environmental impact.

33. Because the IMQ proposal is likely to have a probable significant adverse environmental impact I chose to issue, in my role as SEPA Responsible Official for Jefferson County, a Determination of Significance.

34. The foregoing statement is made under penalty of perjury under the laws of the State of Washington and is true and correct.

Signed at PORT TOWNSEND, Washington, this 28<sup>th</sup> day of May, 2010.

  
STACIE L. HOSKINS

DECLARATION OF STACIE L. HOSKINS - 8

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR JEFFERSON COUNTY

IRON MOUNTAIN QUARRY, LLC, a	)	
Washington Limited Liability Company,	)	NO. 10-2-00181-5
and POPE RESOURCES, a Delaware	)	
Limited Partnership;	)	
	)	
Petitioner/Plaintiffs,	)	
vs.	)	GR 17 DECLARATION
	)	OF KATHY S. LYCZEWSKI
JEFFERSON COUNTY, a Washington	)	
Municipal Corporation, acting through its	)	
Department of Community Development;	)	
and STACIE L. HOSKINS, Planning Mana-	)	
ger, Jefferson County Department of Com-	)	
munity Development;	)	
	)	
Respondents/Defendants.	)	

I, Kathy S. Lyczewski, am over the age of 18, have personal knowledge of all the facts stated herein and declare that I have examined the signature of Stacie L. Hoskins on *Declaration of Stacie L. Hoskins, Jefferson County SEPA Responsible Official*, consisting of eight (8) pages of text with her signature appearing on page 8. The signature is complete and legible.

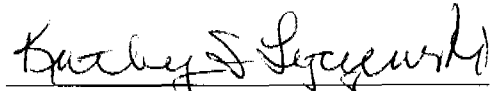
I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

GR 17 DECLARATION OF KATHY  
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Dated in Yakima, Washington, this 28<sup>th</sup> day of May, 2010.

  
Kathy S. Lyczewski  
Kathy S. Lyczewski

GR 17 DECLARATION OF KATHY  
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