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Clark County Community Planning

Oct 4, 2014

Community Planning Office & Board

1300 Franklin, 6th Floor

Vancouver, WA 98666-5000

Subject: Surface Mining Policy Changes

Dear Clark County Community Planning Board,

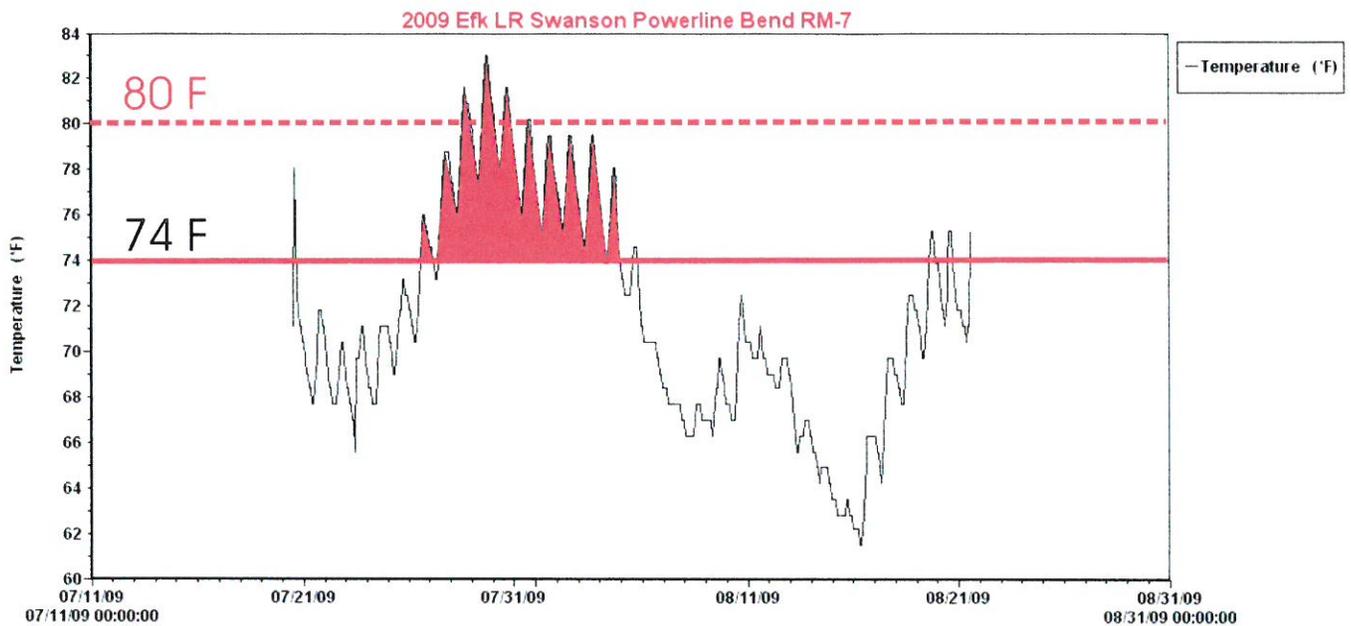
Friends of the East Fork has two critical policy items for the Surface Mining update in addition to those submitted by the Livingston Mountain Groups and we are a member of that coalition.

The first is the need to continue the "No Mining in the 100 yr. Floodplain" which was put in place by previous Commissioners about 10 years ago and was a key step in protecting the streams and rivers in Clark County from further degradation.

Surface mining in the flood plain has a history dating back as the 1960's or later and cause severe erosion, sedimentation, and stream degradation that continues on today. This is well documented by the WA. Dept. of Ecology, a number of scientific reports, and very evident on aerial photos taken over a series of years.

A typical example of this is the East Fork Lewis River, which even though it has 4 federally listed "T&E" species and is now an official WA State Steelhead Sanctuary Stream, the impacts of mining in the floodplain are still ongoing. Most obvious is the impact of water filled gravel pits that both heat up the water that feeds into the East Fork and the interception of groundwater fields that sustain the East Fork in the critical low flow summer months. This low flow condition (often 40 cfs to 50 cfs) allows stream temperatures to reach lethal levels to both fish and macro-invertebrate life in the river (see the actual recording of temperatures in the lower East Fork that exceeded 80 degrees F. High stress temperature starts at 75 F and even this year that temperature has been exceeded.

Clark County needs to retain the "No mining in the 100 yr. Floodplain" policy. There is plenty of Missoula Flood gravel up on the terraces of our rivers and no need to mine in the floodplain which creates long-term impacts that cannot be mitigated.



The other policy concern we have is that of operating hours. Hours at all surface mining operations are supposed to be from 7:00 AM in the morning till no later than 6:00 PM at night. Yet we have one mining site on the lower East Fork who in this September and now into October, has been starting up at 6:00 AM each morning and disturbing the sleep and rest of over 50 households in the river valley. This should not be allowed. It is bad enough that there is no adequate noise control installation at the site as the sound echo's up and down the river valley and appears to exceed noise limit regulations.

Please give these concerns careful considerations. We will follow up with more information and testimony.

Respectfully,

Richard Dyrland, Supervisory Hydrologist & President

Friends of the East Fork Lewis River, WA

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