Bonnie Blessing

Special condition S6.A is somewhat strong because it says to not disturb wetlands and riparian zones. This is important because there are examples from Snoqualmie Pass where they built a gravel pit in a wetland. Gold Creek is purportedly being siphoned off by a nearby gravel pit. See https://www.youtube.com/watch?v=wSOubeF3J4o. It would be good to know more details on that Gold Creek issue. Did they do a tracer study or just model? But In Thurston County, gravel pits are supposed to stay >1000 feet from sensitive resources.
See
https://s3.us-west-2.amazonaws.com/thurstoncountywa.gov.if-us-west-2/s3fs-public/2025-04/cped-cp

Special Condition S8.F.3 says to prevent direct stormwater contract with recycled concrete stockpile by using a cover (or other methods). This seems important if RCA can hold hexavalent chromium or even Cr03 (Ecology publication 22-03-003).

Conditiopn S.3.d.1.b. says BMPs for routing water must contain all flow except when precipitant exceeds the design storm (10-year, 24-hour). DNR offers different guidance, saying to design for a 25 year 24-hour. See:
https://dnr.wa.gov/sites/default/files/2025-03/ger_ofr96-2_best_management_practices.pdf. page 47 of 130.

Gravel pit mined ponds can offer restoration opportunities for salmon or turtles or be a liability with low dO, invasive plants and animals.
https://parkplanning.nps.gov/projectHome.cfm?ProjectID=91530.
The permit refers to San Francisco v. EPA several times. For instance, page 34 of the Fact Sheet which says:
In response to City and County of San Francisco v. EPA, Ecology proposes changes to Special Condition S3.D.3 (in the draft S3.D.4) Mined Pit Pond. Ecology proposes replacing "cause or contribute to a violation of surface water quality standards (Chapter 173-201A WAC)" with "exceed the TSS and turbidity effluent limits specified in Special Condition S2.A." The mined pit pond must meet the surface water criteria as this water body is to be considered a surface water body after reclamation is complete.

My comment on this last statement is this: Surface water quality standards in WAC 173-201 consist of more than TSS and turbidity.

After mining is done, it appears that special conditions S1.1.41 applies. It says
'permittees can terminate coverage when Ecology says that the area has been reclaimed to the satisfaction of the Ecology permit manager. Ecology must determine that the site has been reclaimed to an adequate condition before granting termination'. I suggest that the Ecology permit manager should recommend avoiding leaving the site sin a condition that would support prohibited aquatic species classified in WAC 220-12-090 and would avoid altering the quantity and quality of water sustaining wetlands and associated plants and wildlife. This request is consistent with definitions on page 71 of Appendix B which says,

'since pollution means alteration of the biological properties of waters of the State, such that a

discharge will create a nuisance to wild animals fish or other aquatic life',

and since creating a discharge that creates a nuisance of bullfrogs is a nuisance to fish and aquatic life, then can we call bullfrogs a nuisance?
Avoid creating habitat onsite for prohibited aquatic species identified at WAC 220-12-090 and RCW 77.15.253.
There's guidance and discussion of impacts of gravel pits in Thurston county by Robert Mead that could inform this permit a bit. Please consider applicable elements of Robert Meads paper https://www.skagitcounty.net/PlanningAndPermit/Documents/SkagitAgPit/050624/The Direct and Cumulative Effects of Gravel Mining on Ground Water Within Thurston County.pdf.

Avoid creating habitat for bullfrogs anywhere near spotted frogs.The federal recovery plan says we'll all have to spend billions to get rid of them. It is very hard to do so if established.
Thank you