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By:

RE: Application for GLC Gravel pits at Archery Road - 6 Jan 2025.

Response - Mary Hege 203 W 225 N, Blackfoot, ID 83221 – 208-870-0624

Note – the plain text was paraphrased or copied from the application. The bold-face is my response.

1. 10-8-2-C, pg1, Applicant states that it [property] has set vacant for more than 4 months. **Applicant has owned property since 18 Jan, 2024 and could have grazed or utilized for other purposes, but it was fallow, because of the choices of the new owner, Gail Lim Construction, LLC.** The applicant said that due to lack of topsoil the property was not useful for other purposes. **Documents and testimony previously led to the following: (the drilling for gravel was approximately 8 ft before hitting gravel. Isn't that topsoil? Additionally, one of the P&Z commissioners said you couldn't make a living off the land. What 100-acre parcel can provide a 'living'? Just the size of the property would necessarily need other property to be viable, but this doesn't mean this parcel is of no agricultural value or the ground is no good. It has plenty of topsoil to accommodate its agricultural purpose. And the property has been used for that purpose probably since it was homesteaded.**
2. 10-8-2-E, pg2, Paragraph 2 Moreland plant 18 days per year over 16 years (10-8-K-5 Pg 13, less than 6 trucks per day) . This equates to\$ 27,075 per 6 trucks. Applicant response 10-8-3-2-c, paragraph 2, pg7, 5 yr gravel sales of \$52,400,726.44/\$3.47 [sales in the industry] equates to \$15,101,174 of sales from Moreland or **\$167,790 per day [18 days per year/5 years] of operation. These numbers seem to significantly overstate the value of the extracted gravel, or conversely significantly understate the traffic and use of the pit.**
3. 10-8-2-F-4 Pg 3 Fugitive dust plan. **What water will be used for dust abatement when the water is not in the canals from October to April of each year? There are no water rights for the water which seeps into the pits from the river. And as evidenced by the recent water rights issues (calls on the water), The domestic well water is not available for this commercial use under the water rights at the well [ID#370935-Permit #800018]. The permitted usage is not likely to be extended to commercial application. As well, in the well drillers report, there was no notation of aggregate in the drilled layers.**
4. 10-8-2-F-7, pg. 4 Adverse effects shall be mitigated through setback, buffers, sound attenuation and/or hours of operation. **The buffers from the existing Rose Ponds to the River are much greater that the proposed 150' set-back. The issue of flooding does not seem to be addressed. The property is in a flood zone and has been flooded on multiple occasions. The proposed berms would create an entrapment of the flood waters. Additionally, the applicant/agent previously stated that their hours of operation would be strictly limited, then qualified the statement to say 'unless' the State need them to provide aggregate/asphalt into the evening/night hours. Also, the noise abatement was noted, but unstated was the desirability of the natural sounds – birds, running water, wildlife – as opposed to the mechanical and sustained sounds of industrial equipment. Even the freeway sounds are transitory as compared to the sustained noise from a 24-hour operation. Were the noise measurements done at ground level or from inside the pit?**
5. 10-8-2-c paragraph 3, pg. 5 Silica cases. **Much has been said about the silica and the entrapment of the particles, but the impact on human and animal (particularly equine) is underplayed. The wind direction cannot be controlled, so the silica can potentially reach anyone nearby. My neighbor has fibrosis of the lungs resulting in a loss of 1/3 of lung capacity. This was from a single dirt/dust/silica event, not from sustained exposure.**
6. 10-8-3-a-2, pg. 6, Question #3 Does the regulation deprive the owner of all economically viable uses of the property? #4 Does the regulation have a significant impact on the landowner's economic interest? Paragraph 3, GLC will maintain a buffer zone of 150" from the Snake River. Existing trees will be maintained [where feasible]. **Based on the applicant's earlier response that the hours of operation 'might' be**

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modified, it seems that the maintenance of the existing trees, as well as the set-back 'might' also be modified. There are a lot of 'might-bes and maybes' in the actual carry-through of agreed terms.

7. 10-8-3-d, pg.8 ..we will protect any water from leaving our property and minimize the risk of an environmental event. Most of the water in the Rose Ponds is sub-water which rises and falls with the river levels. If the water in the proposed pits is also from the Snake River, what are the contaminants which will leech back into the river when the water levels are dropped? This fluctuation is managed by the BOR and is not in the control of the applicant. Anyone who has been out to the Rose Ponds for even a single summer, knows that the water in the ponds goes up and down with the river levels, even though there is not a flow-thru water source. It is all ground water provided by seepage from the river. How could it be any different with the water levels in the proposed pits/[ponds? Therefore, how can the applicant actually protect any water from leaving their property and minimize an environmental event.
8. 10-8-3-f, pg.8 Lavaside Pit is 6.8 miles away. The Moreland Pit is 7.7 miles away, also one at 574 W 200 N (5.8 mi), 53 N 550 W (7.0 mi) , 40 W Riverton (14 mi). These pits are relatively close, so the distance does not seem to be a factor in the ready availability of the gravel.
9. 10-8-3-K-3 pg12, Driving to Rose Ponds. The Archery Road is heavily utilized by pedestrians, camping vehicles and off-road vehicles for recreation at the Rose Ponds. Safety is a critical issue.
10. 10-8-3-K-7, pg. 13 Rose Rd, (not adjacent to this property) is the ONLY access point for shipment of the resulting gravel/asphalt products to customers. According to the traffic study, The Archery Range Road approach did not meet left turn auxiliary lane warrants. Additionally, the site-study could not include the increased traffic generated by the pit-mine operation. (The expected construction period trips-per-day [tpd] is 12 [twice the volume stated in item 2 above] The three years with the highest tpd included 2024 and was 20 tpd for the construction season. Page 12 of the Traffic Study report shows the peak hour AM to the 95 NB and 92 SB, the PM peak is 280 NB, 206 SB. With the proposed pit mine, the projected AM peak hour traffic would be 130 NB, 154 SB, and PM peaks at 362NB, 270SB. The unknown is whether the trucks coming from the pit will be 10 wheelers with pup trailers, or semi-trailers/truck. The trucks on the drawings were truck/trailer units. Can the trucks safely make a NB turn without infringing on the SB lane of Rose Road? The study represents the modified turn onto Archery Road from Rose, but not the turn from Archery onto Rose.

While this proposed use may be allowed un the CUP requirements, it is incompatible with the recreational use and the nearby subdivisions and homes.

I would encourage you to deny this application.

Sincerely,

Mary Hege