

Date: July 15, 2021

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Subject: GRDE21-0004, Application to Expand Filling of E-Trench on Ravensdale Ridge

References:

- A. GRDE 21-0004, Phase II reclamation of the previously approved filling and grading of Ravensdale property. Expansion includes modification to Trench E. Phase I was approved under KC File GRDE18-0114. Application filed January 8, 2021.
- B. GMVUAC Public Comments, GRDE18-0114 – Expansion of Ravensdale LLC Trench Filling and Amended SEPA Environmental Checklist, submitted to Department of Local Services (DLS)-Permitting on October 15, 2018 (attached).
- C. GRDE18-0114, Expansion and reclamation of the previously approved filling and grading of the Ravensdale property on the 215-acre site. Application filed July 24, 2018. Permit issued on August 13, 2020.
- D. Brathovde's Public Comments, GRDE 21-0004, submitted to DLS-Permitting on July 14, 2021 (attached).
- E. King County DLS-Permitting Division Determination of Nonsignificance (DNS) issued under the State Environmental Policy Act for GRDE18-0114 on August 10, 2020.

Comments:

In response to King County's DLS Public Notice dated June 23, 2021, regarding the subject permit application—Ref. A GRDE21-0004, the Greater Maple Valley Unincorporated Area Council (GMVUAC) provides the comments herein.

The GMVUAC has followed activities on the subject site since 2010 and last submitted detailed comments to DLS-Permitting (Ref. B Public Comments dated October 15, 2018—attached). We have supported the work conducted by local Ravensdale residents Michael and Donna Brathovde regarding the subject site for many years. They continually have raised key issues related to the long-term adverse environmental health effects to the Ravensdale community.

To fully comprehend the significance of the *current* situation, and the fear of additional environmental damage that would be caused by the approval of GRDE21-0004, one cannot separate Ref. C GRDE18-0114 from GRDE21-0004. In fact, GRDE21-0004 is contingent upon GRDE18-0114 and its approval would worsen an already deteriorating situation.

Issues raised by GRDE18-0114, were never adequately addressed over the period October 2018 through August of 2020. For a detailed examination of these issues, we refer you to the attached Ref. D comments by the Brathovdes that you will receive under *separate* cover. The GMVUAC concurs with the concerns and recommendations conveyed in the Brathovdes' public comments.

It is imperative to note that *under the same permit number*, GRDE18-0114, the Ref. E DNS listed DLS-Permitting's actions and we interpret them as follows:

- Changed the project site plan July 29, 2020.
- Revised the environmental checklist on July 1, 2020.
- Revised the geotechnical report dated July 28, 2020 and received July 30, 2020.
- Revised "*other*" documents in the file.
- Separated Trenches E and F from GRDE18-0114 to be dealt with later in GRDE21-0004.
- Quoted a non-functioning Haul Route Agreement (HRA) that had not been fully enforced.
- Claimed that the Brathovde's comments had been addressed "*by reducing the scope of the project (phasing) and correction and revision of reports and plans throughout the 2 years review of this project.*"

Between October 2018 and July 2020 there was no information released to the Public. Then the items listed in the first three bullets above were posted. A few weeks later on August 10, 2020, the Ref. E DNS was issued under SEPA. Finally, three days later on August 13, 2020, the permit was issued. This process provided the Public with little transparency and in a lightning-quick manner resulted in the issuance of a DNS and a Permit. This does not serve the Public and is unacceptable!

In addition to the process issues described so far, there is an overriding issue that tends to tie the hands of the public: "*This determination is issued pursuant to the optional DNS/MDNS process in WAC 197-11-355. No further comment period is provided. There is no administrative appeal of this decision. **Any appeals must be submitted to King County Superior Court.***" (original bolded font used in the Ref. E DNS)

The entire process was unduly harsh, did not give recognition of serious concerns that had been raised for months, and the project was hastily implemented. Yet, we observe the permit application for GRDE21-0004 states it will follow the same process as GRDE18-0114, making it even more important that all community issues are addressed upfront. If not, might we assume we have no other course but to take our concerns to the King County Superior Court? A potentially untenable situation for any person with limited discretionary funds.

Recommendations:

1. Add additional conditions to Permit GRDE18-0114 and address issues in a forthright manner before permitting GRDE21-0004.

2. Monitor and enforce related HRAs to ensure impacts on King County roads are adequately addressed.
3. We invite County officials to walk the land with us and see the situation in person.

We appreciate your prompt attention to this matter. Thank you.

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