



Date: April 17, 2023

To: Mark Rowe
Thomas Campbell

Subject: Reserve Silica ~40-ac Clearcut

As you recall, we discussed Reserve Silica's ~40-acre clearcut that was harvested without a WA Forest Practices Act permit at our remote meeting on April 3. Reserve's General Manager, Fred White, had first told the WA DNR forester last August that their logging contractor had gotten the permits to do this logging. But when he failed to deliver a copy of such permit, he then stated in December to the new WA DNR forester that the King County Clearing and Grading Permit, GRDE15-0011, just renewed as of August 19, 2022, authorized the timber harvest without an FPA permit because the site was being converted to a land use other than Forestry.

To try to validate Fred White's December assertion, we attempted to get a copy of the GRDE15-0011, with renewal dated 8/19/2022, and the associated Permit Conditions, through multiple searches of the King County Permitting website. But we were totally unsuccessful in this effort. We then submitted a formal Public Records Request to obtain a copy of the permit, asking for any associated records and correspondence as well.

Greg Felton, Permitting's Public Records Officer, has been extremely helpful in this endeavor, supplying nearly 2,000 pp of records associated with GRDE15-0011. Greg still has some emails he's compiling to send, but otherwise Greg has said that he has provided everything in the file on GRDE15-0011. And incredibly, in those nearly 2,000 pp of material, we have found NO copy of the actual permit, nor the associated Permit Conditions – either from the original issuance of the permit, nor any of the six renewals/extensions that have been granted since, including the current 8/19/2023 version.

Review of the documents provided by Greg, we did notice two comments in recent Field Notes from Permitting Engineer Ted Tedasse that may have a bearing on this issue. In Tadesse's January 20, 2022 field notes, he stated, "*the applicant also indicated that in the future they will be seeking to apply for asphalt/concrete processing facility permit from Ecology and the County*"; and his August 18, 2022 field notes state, "*For the purpose of commencing a new reclamation activity (according to [Reserve Silica], within 6 months), the applicant has cleared the site ... and roads are being currently built.*"

Ravensdale residents, Michael and Donna Brathovde, informed us last week that extensive activity is currently occurring on that 40-acre site, which appears to be preparation for some kind of construction (see photos of this activity). On asking Greg Felton about any records that might relate to this current activity, and noting the absence of any copy of GRDE15-0011 in the records, Greg confirmed that he could find no other records in the file that appear related to the current activity, and he forwarded our request for a copy of GRDE15-0011, including Permit Conditions and any information relating to the current activity, to Ty Peterson and Ted Tadesse. But we understand Ty is out of the office until sometime later this month.

We have grave concerns regarding the activity occurring on this 40-acre site, and its apparent conversion to some purpose other than Forestry. This particular 40-acres was in mature timber prior to Reserve's recent clearcut (the timber rights were owned by Weyerhaeuser and sold to Reserve on Aug 3, 2021), and has never had any surface mining, and no underground mining for at least the past 75 years. Past KC Permitting documents indicated this timber would remain in-place while the majority of the remaining reclaimed mining lands would be returned to forest cover – its pre-mining condition – and the site returned to its former Forest zoning.

Given the apparent nature of the current activity, it would seem there should have been a SEPA threshold analysis done; but we have not seen such an assessment, nor find any evidence of such on the KC Permitting website. And it would seem there should have been signs posted to inform the public of this Land Use change, and past Parties of Record,

including GMVUAC, should have received some notification of such a change and been provided an opportunity to provide public comment. But this clearly has not been the case.

We would be most appreciative if you could look into this situation, and let the GMVUAC know what the intent of the on-going activity on this site is; and why no public notice of such activity has been issued. And we would still VERY much like to get a copy of GRDE15-0011 (both the current 8/19/2022 version and the version that would have been in place at the time of the clearcut – late 2021/early 2022), and the associated Permit Conditions. Thanks for any assistance you can provide on this issue.

Peter Rimbos
Chair, Growth Management Committee
GMVUAC

cc: Michael Brathovde, Ravensdale Resident
Donna Brathovde, Ravensdale Resident
Susan Harvey, GMVUAC Environment Committee, Ravensdale Community Representative
Greg Wingard, President, Green River Coalition
Tim O'Brien, President, Enumclaw Plateau Community Association





Note: photos taken from adjoining Wagner/Erickson property.