

**Reserve Silica Permit
GRDE25-0052**

ADDITIONAL PUBLIC COMMENT

October 16, 2025

To: Warren Clauss: wclauss@kingcounty.gov
Project Manager, Permitting Division
King County Department of Local Services (KC DLS)

Re: **Additional Public Comment—Clearing and Grading Permit GRDE25-0052**

Please accept the *Additional Comments* herein on the subject permit application from the Enumclaw Plateau Community Association (EPCA), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), and Waste Action Project (WAP)—all of which include members from and represent a large portion of southeast King County. These supplement our extensive Comments submitted on September 26, 2025.

Coordinated by:

Peter Rimbos: primbos@comcast.net
Regional Coordinator and Chair, Growth Management Committee, GMVUAC

Approved by:

Pat Traub
mountainride@comcast.net
President, EPCA

Steve Hiester
hies_skel@hotmail.com
Chair, GMVUAC

Greg Wingard
greg@greenrivercoalition.org
gregWAP@earthlink.net
Pres., GRC; Exec. Dir., WAP

cc:

Ty Peterson, Commercial Permits Manager, KC DLS, Permitting Division:
ty.peterson@kingcounty.gov

Jim Chan, Director, KC DLS, Permitting Division: jim.chan@kingcounty.gov

Leon Richardson, Director, KC DLS: LRichardson@kingcounty.gov

Chris Jensen, KCCP Manager: chris.jensen@kingcounty.gov

Lauren Smith, Dir. of Regional Planning, KC Exec. Office PSB:

lauren.Smith@kingcounty.gov

Shannon Braddock, KC Executive: shannon.Braddock@kingcounty.gov

Reagan Dunn, KC Councilman, District 9: reagan.dunn@kingcounty.gov

Jerome Cruz, Solid Waste, Community Health, & Zoonotics Program, EHS Div., PHSKC:

jercruz@kingcounty.gov

Rian Skov, Chief Reclamation Geologist, WA DNR: Rian.Skov@dnr.wa.gov

Alan L. Noell, Solid Waste Mgmt. Pgm., WA DOE: anoe461@ECY.WA.GOV

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Mine Reclamation Needs Not Addressed

The subject permit application, **GRDE25-0052**, proposes a plan to dump up to one million cubic yards of clean fill and/or inert wastes over the next 5 – 7 years in two massive piles occupying 37.5 ac on Areas 5 and 6. The only approved filling of either clean fill under the *existing* KC DLS-P **GRDE15-0011** Clearing and Grading (C&G) Permit, or inert wastes under the PHSKC **PR0082027** Inert Waste Landfill (IWL) Permit, is to **restore the sand mining pits to their pre-mining topography**, so the backfilled pits can be final graded, top-soiled and revegetated to forest or open space.

THIS PROPOSAL DOES NOT ADDRESS ANY DEFINED “MINE RECLAMATION” NEED.

“Reclamation” of Old Coal Mine Areas Unneeded

Reserve Silica’s (RS’s) application to KC DLS-P for a *new* C&G permit (GRDE25-0052), and its linked application to PHSKC to expand its *existing* IWL Permit, to add an additional, disconnected 80-ac to its current 52-ac Landfill, are “*aimed at reclaiming former coal mining features*” in Areas 5 and 6 [[12/20/24 Tech Memorandum from Herrera to DLS-P, Subject: Project Narrative for Fill Placement at Reserve Silica’s Ravensdale Facility](#)]. RS’s lawyer, Doug Stedding, stated in the March 3, 2025, GMVUAC meeting that RS has done “*extensive investigation*” of coal mining activity on its property, spending “*hundreds of thousands of dollars*” on LIDAR (Light Detection and Ranging) and other studies, and now “*know exactly*” where all the mine areas on the property are located. But in spite of KC DLS Director, Leon Richardson, directing KC DLS-P’s Ty Peterson at the October 7, 2024, GMVUAC Meeting to provide us RS’s information on coal-mine workings in need of reclamation and RS’s Operation Manager, Jeffry Wright, promising to provide this information at the August 4, 2025, GMVUAC Meeting, we still have yet to receive anything from either source.

WE ARE NOT AWARE OF ANY INFORMATION ON OLD COAL-MINE ADITS THAT JUSTIFIES WHAT IS PROPOSED.

What “New” Reclamation Plan ?

Our expectation was that RS’s draft of a new Reclamation Plan, mandated by KC DLS-P to replace the invalidated 2014 Interim Reclamation Plan that covered reclamation of the sand mining pits, would surely address the fundamental issue of: *What explicit coal mining risks are being resolved with the proposed two massive piles totaling one million cubic yards of fill?* However, in spite of KC DLS-P *requiring* RS to submit this new draft Reclamation Plan [[Ty Peterson’s 4/5/24 email to Fred White](#); [Ty Peterson’s 7/22/24 email to RS](#); [Warren Clauss’ 11/4/24 email to Frank Melfi](#); and [Doug Stedding’s 3/3/25 statement that RS delivered their proposed new Reclamation Plan to DLS-P on the 2/28/25 deadline](#); and the implication from Ty Peterson’s 3/7/25

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email to Peter Rimboas that all the documents demanded by DLS-P (presumably including the new draft Reclamation Plan) were received by the specified deadline], it was not included in the documents made available to the public by KC DLS-P as part of the 9/5 – 9/26 SEPA/Public Comment Review.

THERE IS NO EVIDENCE THAT A NEW RECLAMATION PLAN EXISTS.

Bottom Line (“Red Herring”)

The coal mine hazards RS claims are being addressed through its proposed one million cubic yards of fill in the two massive piles, are two pair of tiny coal mine adits (i.e., surface openings to underground coal mine workings) identified on Herrera’s February 2025 *C1.01* map. These four adits likely total just a fraction of a single acre in size, and aerial imagery shows two of these adits have already been filled by RS, and the other two are called out on the map to just be fenced and/or grated, with no filling proposed.

NONE OF WHAT IS PROPOSED IS NEEDED TO SOLVE WHAT ARE ESSENTIALLY NON-EXISTENT PROBLEMS.

Conclusions

1. This proposal does not address any defined “*mine reclamation*” need.
2. We are not aware of any information on old coal-mine adits that justifies what is proposed.
3. There is no evidence that a new reclamation plan exists.
4. None of what is proposed is needed to solve what are essentially non-existent problems.
5. There are clearly a host of very serious risks RS ’s proposed “*solution*” poses for this property, the environment, and the community.

Recommendation

We, again, call for both the *new* **GRDE25-0052** Permit Application and the *linked* **PR0082027** IWL Expansion Permit Application be *categorically denied* by KC DLS-P and PHSKC, respectively.