

March 12, 2024

To: Fereshteh Dehkordi
SEPA Permit Project Manager
fdehkordi@kingcounty.gov

Re: Cumberland Aggregate Mine and Asphalt Plant; File No.: GRDE23-0083
Applicant: Segale Properties LLC, P.O. Box 88028, Tukwila, WA 98138

The Greater Maple Valley Unincorporated Area Council (GMVUAC) considers the Segale Properties LLC **Cumberland Aggregate Mine and Asphalt Plant** proposal to constitute a major project that clearly will have a significant adverse effect on the environment. The likelihood that an Environmental Impact Statement (EIS) should and needs to be prepared is substantial; accordingly, the Optional DNS/MDNS Process is inappropriate for compliance with SEPA. We call on the King County Department of Local Services, Permitting Division (DLS-P) to issue a Determination of Significance (DS) calling for conduct by the Applicant of an EIS.

We have reviewed multiple Comment Letters sent to DLS-P related to this proposal and fully supports their findings, conclusions, and recommendations. These include:

“Traffic Impacts of the Cumberland Aggregate Mine and Asphalt Plant Project, A proposal of Segale Properties LLC, King County Permit Application GRDE23-0083,” March 11, 2024, by Michael R. Birdsall. — Mr. Birdsall, the GMVUAC’s Transportation Focal, submitted these comments as an individual and professional expert. Mike has 50+ years of experience in transportation planning and analyses.

“Public Comment submittal GRDE23-0083 (SEGALE Green River Gorge Mine Complex Project),” March 12, 2024, by Tim O’Brien. — Mr. O’Brien has worked 30+ years in the heavy equipment and mining industry. During that time Tim has visited hundreds of mines—many of them aggregate mines. Tim is a local expert on mining in southeast King County.

The enormity of the proposed project cannot be overstated: ~990 ac over 15 parcels; 35 years of operation with potential mining capacity of up to 55 million cu yd; An unknown number of decades for reclamation; impacts to 4.5 river miles along the 12-mi Green River Gorge; Impacts to 2.25 mi adjacent to Cumberland and Kanaskat-Palmer State Park; Large Asphalt (and used Asphalt Recycling) facility close to Kanaskat-Palmer State Park; Forest fire risks posed by Industrial size high-pressure, liquid Natural Gas tanks to be used to melt/process asphalt; 250,000 gal/da (91 M gal/yr) of water required for operation and same about of waste water; Location is in one of windiest areas of the Cascades posing health risks due to poor dust control, as well as potential fire risks; and Impacts from surface water runoff and discharge into Green River, Deep Creek, Hyde Lake, and Deep Lake—just to name a few.

We also question why the Applicant is seeking only *one* permit for an overall project that should need *six* permits: five pits and an Asphalt Plant

We have particular concerns the project, as proposed, is not in full compliance with King County: Roads Standards; Surface Water Design Manual; Zoning Requirements; Grading Requirements; and Critical Areas Code Requirements, as the referenced letters discuss. Based on all these concerns, we urge KC DLS-P, in order to make any informed decision, to issue a DS calling for the conduct of an EIS by the Applicant.

Approved by: Steve Hiester
Chair, Greater Maple Valley Unincorporated Area Council
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