



King County
Department of Permitting
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March 11, 2013

Washington State Department of Natural Resources
South Puget Sound Region
Forest Practice Division
950 Farman Avenue North
Enumclaw, WA 98022

RE: Forest Practice Application #2415960
Erickson Logging, Inc.

Thank you for the opportunity to comment on Forest Practice Application #2415960 that is under review by the Washington State Department of Natural Resources (DNR). The Department of Permitting and Environmental Review has a permit application under review that is seeking approval to subdivide the property that is the subject of this forest practice application into a clustered development of 47 residential lots on 132 acres and setting aside another 128 acres as a resource tract. The subdivision application is presently on hold, at the applicant's request, as they prepare supplemental information the Department of Permitting deemed necessary to continue its review of this proposal. The deadline to submit the requested information is July 31, 2013.

We would like to share some observations from our review of the pending subdivision application. This proposal is an even aged harvest of 195 acres, occurring within six separate sub-basins, all eventually draining into the May Creek Drainage Basin. The harvest area contains, or is directly adjacent to 14 wetlands and 6 streams that have been previously identified in special studies and mapping during the review process for the Serenity Estates Subdivision Plat (DPER File #L07P0007). The FPA further purposes the construction of 3,800 lineal feet of new logging road, primarily in the northwest and eastern portions of the harvest area. Approximately 5,500 MBF of timber will be harvested using ground based harvesting equipment.

The May Creek drainage basin has been the subject of recent study and attention by King County due to drainage complaints of poor water quality and flooding on private parcels. Flooding has occurred on parcels directly adjacent to May Creek and has been attributed to sediment accumulation, reducing hydraulic capacity of the stream and negatively impacting water quality. King County has determined this to be a basin-wide problem. To avoid further detrimental impacts to this basin, the FPA should be evaluated to determine impacts from increased surface water runoff, soil erosion, sediment transport, and potential destabilization of steep slope areas.

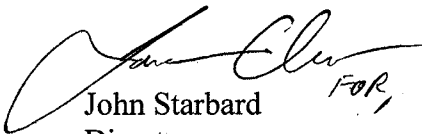
In the forest stewardship plan and geotechnical evaluation that were prepared for management of the 125 acre resource tract that is proposed for harvest under this FPA, measures were proposed to reduce the potential impact from forest management practices on these properties. These included such things as phasing implementation of the management prescriptions over a ten year time period, minimizing disturbance on steep slope and erosive soils by requiring cable yarding in these areas, and by limiting road construction and timber harvest to the drier months of April through October of the year. Ground based harvesting by low ground pressure equipment was recommended to minimize soil rutting and compaction, which should be limited to the dry season.

Given the size of this proposed timber harvest and the sensitivity of the site and adjoining properties, DNR should require a new geotechnical evaluation be completed. Increased surface water runoff following timber harvest should not be allowed to concentrate and discharge in areas where slope saturation may occur, triggering slope instability, increased erosion, and sediment transport. Logging road design and construction should include provisions to disperse storm water following collection from runoff in ditches, culverts, and swales. Dispersion should be required to prevent concentrated flows which may trigger erosion and sediment transport. Disturbed areas such as landings, cut/fill slopes, and other areas with exposed mineral soil, should be permanently stabilized by requiring hydro-seeding, mulching, erosion control fabrics and other methods to minimize erosion and sediment transport.

If you have any questions or would like to discuss this matter further, please contact Randy Sandin, Interim Program Manager, Resource and Residential Product Section, at randy.sandin@kingcounty.gov or by phone at 206-477-0378.

Thank you again for the opportunity to comment on this proposal.

Sincerely,



John Starbard
Director

cc: Jim Chan, Assistant Director for Permitting
Randy Sandin, Interim Program Manager, Resource and Residential Product Sections
Kim Claussen, Program/Project Manager III