

PROJECT SITE HISTORY – LOT Q

Narrative of Section 30 BLAs and Creation of 240-acre Lot Q

Palmer Coking Coal Company, LLP (Palmer) owns property in Section 30-21-7 comprised of one tax parcel totaling 240 acres (Lot Q of King County BLAD18-0014). Palmer's proposal is to rezone Lot Q from RA-5 (M-Potential) to Mineral zoning (M).

The entirety of Section 30 (640 acres) was acquired by a mining company in the early 1900s. Palmer entered into a real estate contract to purchase the property in 1953 acquiring fee ownership in 1956. The site has long been used for surface mining operations. From the 1950s to the 1970s, the property was under lease by a silica sand mining company. From 1969 through 1975, King County Public Works was granted leases to store, stockpile, and remove gravel from the same site where silica sand had previously been extracted. In 1971, the property was segregated into two ownerships: 111 acres was acquired by Morris & Sons, Inc. (now Green Section 30) while the other 321 acres were retained by Palmer. During the period from 1979 through the 1990s, Palmer leased this property to several different oil, gas, and mineral recovery companies.

Palmer's property is currently zoned RA-5 (M-Potential). It is located south and east of a 111-acre property owned by Green Section 30, LLC which is zoned for Mining. Palmer owns additional property to the east (Section 29-21-7), west (30-21-7), north (19-21-7), and southwest (25-21-6 and 36-21-6) of the subject property. In fact, 91% of the 19,800 lineal foot perimeter encompassing Lot Q is owned by Palmer or already zoned and used for mining.

In the late 1980s, Palmer worked closely with King County planning personnel to designate several of its properties in this area as future mine sites. And not only that in Section 30, but additional Palmer lands to the north in Section 19 (see Mineral Resources and Existing / Potential Extractions Sites from Enumclaw Community Plan, 1990). A 20-acre segment of that Section 19 property is contained within Lot Q.

In the early 1990s, two separate reviews were adjudicated by Hearing Examiners which established legal, non-conforming use classification, allowing surface mining for two properties, both within the original Section 30 property. In Jan. 1992, the Green Section 30 property obtained legal, non-conforming use status for their proposed Wheeler Topsoil sand and gravel mine. A King County grading permit was issued in April 1993 and later, a DNR surface mining permit. In 2015,

a rezone to Mineral (M) was granted to the 111-acre Green Section 30 ownership under King County Ordinance #2010-0461, Enactment #17981.

A portion of the Palmer property, known as Hyde Gravel, was petitioned to establish its legal, non-conforming use in Aug. 1994. King County approved the application and grading permits. State surface mining permits and Ecology permits followed. For a detailed narrative of Palmer's operating and permitting thereof (see Project History: Hyde Gravel – Historic Use, Legal Non-conforming, Permitting, Surveys – narrative only without attachments).

While physical attributes of the underlying resource-oriented property haven't readily changed in the last 30 years, its configuration between and amongst legal lots and tax parcels has. From 1900 through the 1950s, there was one large parcel and four Government survey lots in Section 30. During the 1956 sale, Palmer-related companies acquired several tax lots. The 1971 sale to Morris & Sons created two different ownerships. In 1991, Palmer undertook a large lot segregation into 14 parcels, each about 20-acres. That division created tax parcels -9037 and -9040, as referenced in King County's Jan. 1995 decision to approve Hyde Gravel as a legal, non-conforming use for sand and gravel mining.

In 1999, a boundary line adjustment (BLA) #L96L0131 reconfigured most lots in Section 30. Later that year, a 20-acre segregation (Rec. No. 1999081790015) reformulated some of Section 30 into 15 lots most of which were conventional rectangles. Another BLA #L11L0009 (Rec. No. 201306189005), created the first incarnation of what would later become Lot Q. Called Lot O in that BLA, it was just over 240 acres, but included a number of sensitive areas including the west side of Fish Lake and two kettle wetlands further north. After subdivision into 40-acre lots and BLAD15-0004 (Rec. No. 20150612900002), a new Lot I was formed, similar to the previous Lot O, but smaller, and still including the sensitive areas noted above.

In Feb. 2015, Green Section 30's Franklin Ridge property was approved by the King County Council for rezone to Mining. In May 2015, Palmer filed a Docket to the King County Comprehensive Plan proposing rezone of the Palmer property to Mining (see King County Docket Form dated May 29, 2015). A docket is a suggested change to the comprehensive plan. The King County Executive responded to the docket request in Nov. 2015 with a recommendation that Palmer pursue a Site-Specific Zone Reclassification. The Executive's first recommended step was to file for a Pre-Application conference (see Executive response dated Nov. 18, 2015).

During that same time period, Palmer embarked on a geological exploration program involving geologist, George Bennett of Bennett Consulting, PLLC and Cascade Drilling of Federal Way. Palmer sought answers for two questions:

1. How much remaining gravel reserves did Palmer possess at its primary Section 10 gravel pit in Black Diamond? and
2. What was the depth and extent of prospective gravel resources at Section 30, including Hyde Gravel?

The drilling report was delivered to Palmer in Jan. 2016. The Black Diamond sand and gravel reserves were not as extensive as previously believed, but those in Section 30 were much deeper and more widespread than expected. Potential sand and gravel reserves were measured by Bennett at about 135,000 tons per acre on the subject properties (see Bennett Consulting report dated Jan. 11, 2017). With results in hand and mindful of the fact that Palmer's property now bordered an active gravel pit, which was recently zoned Mining and seemed likely to grow, Palmer determined that the RA-5 zone for its property was not a viable long-term strategy.

A few months later, the Washington Supreme Court issued its controversial Hirst decision (No. 91475-3) in which the justices held that exempt water wells were no longer an automatic legal right but were henceforth subject to county planning. The ruling threatened individual water wells serving rural lots, particularly those in areas with closed water basins, like the nearby Green River. It was now clear to Palmer that RA-5 zoning of the property was no longer feasible as the property was not served by a water district and large numbers of individual water wells would be almost impossible to secure.

At that point, Palmer spoke with Fred White, a King County grading official about a possible rezone to Mining. At White's suggestion, Palmer filed a Pre-Application Meeting request to White and Fereshteh Dehkordi in a letter dated Nov. 16, 2016. Application No. PREA16-0261 was established and a meeting set for January 23, 2017.

Palmer retained Sewall Wetland Consulting to survey the site for wetlands and reports for each were delivered on Dec. 26, 2016. Sewall's reports identified four wetlands within the area thought suitable for gravel extraction (see Wetland Exhibits – Coversheet and individual Wetlands A, B, C, and D). Palmer retained Triad Associates to prepare a draft "Rezone Parcel" that included a number of small lots and locations where wetlands were found. The draft "Rezone Parcel" also included about 20-acres in Section 19, just across the north line from Section 30.

The Jan. 2017, Pre-Application meeting with Fereshteh Dehkordi, Laura Casey, Steve Bottheim, and Robert Eichelderfer produced a number of King County recommendations, the key one being:

“DPER recommends that a Boundary Line Application be submitted, approved, and recorded prior to the submittal of the rezone application. Small lots may be merged as part of this BLA to comply with provisions of KCC21A.22.060.” (See King County DPER Memo dated Jan. 23, 2017).

Palmer next engaged Lanktree Land Surveying (Lanktree) to prepare a BLA with a number of objectives, including:

- Creation of one parcel which encompassed sand and gravel reserves identified by the Bennett geologic report;
- To the extent possible, removal and segregation of sensitive areas particularly wetlands which couldn't be mined under normal circumstances;
- Separation of sensitive areas into new parcels;
- Transferring unnecessary small parcels onto adjacent Palmer lands, while complying with King County regulations on minimum lot sizes;

Because of the desire to best protect wetland buffers, additional surveying was required to delineate wetlands and configure lots so as to provide clear and accurate boundaries. The only area where wetland buffers were allowed in the newly designed rezone parcel were those associated with Fish Lake (Wetland D). And that buffer area was limited to lands northwest of the Puget Sound Energy (PSE) powerline and access road, which had been in place for almost 100 years. Because this well-developed road within the powerline right-of-way remains in active use for the long term, Palmer determined that this particular buffer area was better left within the rezone site, as the road will be used by Palmer to manage the site, and by PSE to monitor their powerline.

Following considerable surveying, title research, and proof of separate lots, Lanktree submitted Palmer's BLA to King County in March 2018. A Complete Application Notice was provided on April 17, 2018 with a goal to process the application within 120 days. The King County file number is BLAD18-0014. To both Palmer and Lanktree's frustration, that goal was consistently ignored. King County hired a new engineer to review BLAs. For Palmer, that new engineer proved to be a costly and time-consuming experience.

Month after month passed with little action, but continuing promises. 'T's were crossed and 'i's dotted – again and again, yet still no approval. The calendar turned to 2019, but the BLA still wasn't approved. It almost seemed like someone

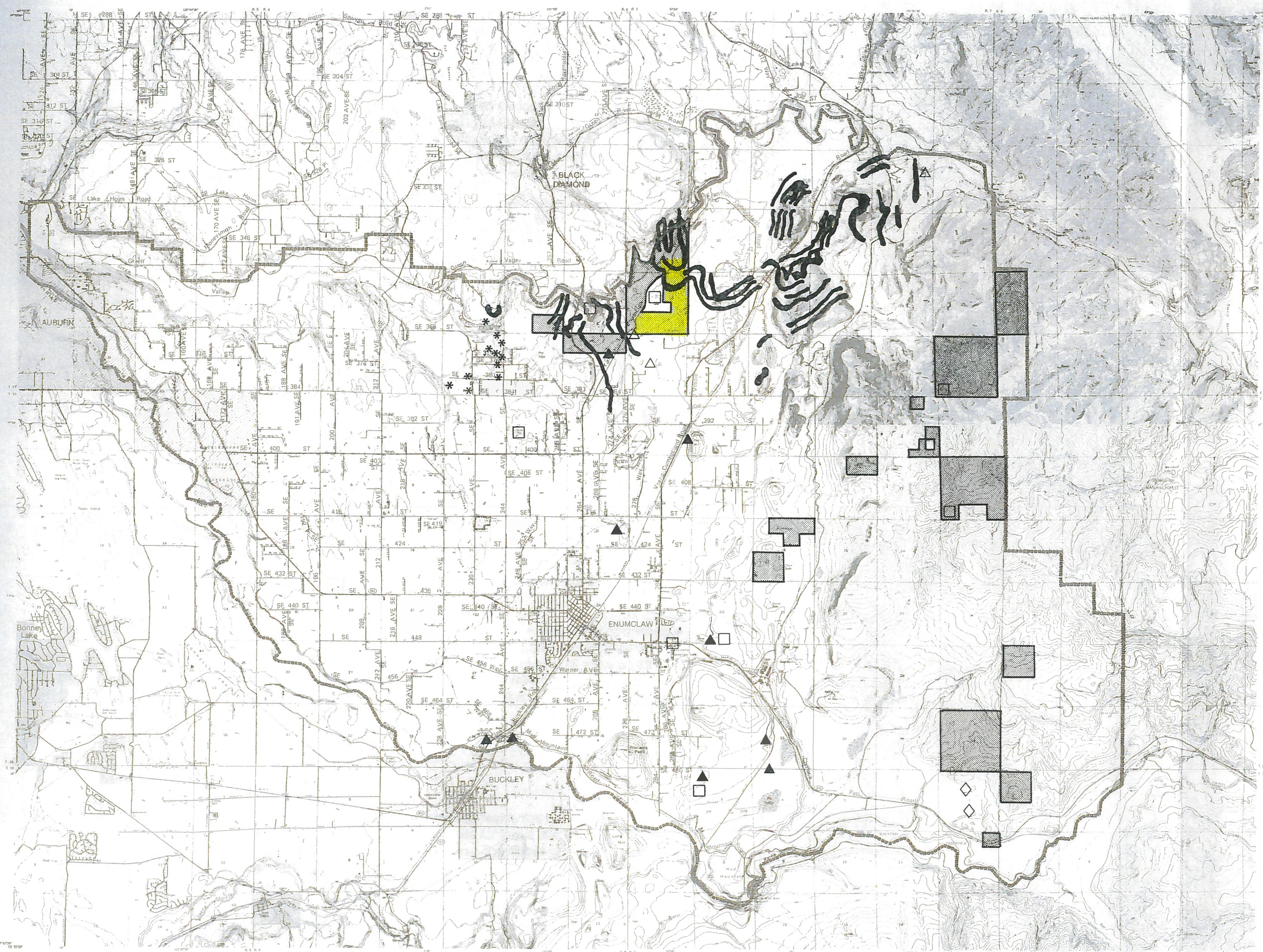
in the department was targeting Palmer's BLA request, for there were delays followed by additional delays. Finally, nearly two years after Palmer first submitted our complete application the BLA was approved and recorded in March 2020 under Rec. No. 20200311900001 (see BLAD18-0014 sketch map).

Additional supporting maps and exhibits can be provided upon request.

Attachments:

- Mineral Resources and Existing / Potential Extractions Sites from Enumclaw Community Plan, 1990
- Project History: Hyde Gravel – Historic Use, Legal Non-conforming, Permitting, Surveys (narrative only without attachments)*
- King County Docket Form dated May 29, 2015
- Executive response dated Nov. 18, 2015
- Bennett Consulting report dated Jan. 11, 2017
- Wetland Exhibits – Coversheet and individual Wetlands A, B, C, and D
- King County DPER Memo dated Jan. 23, 2017
- BLAD18-0014 map (with Rezone lot and Green Section 30 highlighted)

* The complete copy with attachments is available in a separate file.



MINERAL RESOURCES AND EXISTING/POTENTIAL EXTRACTION SITES

- △ Clay Pits
- Coal Seams
- * Oil and Gas Wells
- ▲ Quarries
- Sand and Gravel Pits
- Mineral Reserves (Oil, Gas, Coal, Sand and Gravel)
- ◇ Silica Quarries

Source: "Geology and Mineral Resources of King County, Washington," 1971, Livingstone; land use survey, King County Planning and Community Development Division; and letters from local mineral resource owners/operators.

NOTE: This map shows approximate locations of known sand, gravel, coal and other mineral resource deposits and extraction sites in the Enumclaw planning area. This map does not constitute a land use designation: inclusion or noninclusion of a site on this map will not prejudice review of a mineral extraction proposal under applicable policies and regulations. The purpose of this map is to notify the public of the location of existing sites and where potential new operations may occur in the future.



Enumclaw
Community Plan

King County Planning and Community Development Division



PROJECT HISTORY: HYDE GRAVEL

Historic Use, Legal Non-conforming, Permitting, Surveys

Palmer Coking Coal Company's 24.5-acre Hyde Gravel site has long been contemplated for surface mining operations. Palmer Coking Coal Co. (hereinafter "Palmer") entered into a real estate contract to acquire the property in 1953. Palmer obtained fee title in 1956. From the 1950s to the 1970s, the property was mined under a lease to a silica sand mining company. From 1969 through 1975, King County Public Works was granted leases to store, stockpile, and remove gravel on leased property. In 1971, the Section 30-21-7 property was segregated between two ownerships: 111 acres was acquired by Morris & Sons, Inc. (now Green Section 30) while the remainder was retained by Palmer. From 1979 through the 1990s, Palmer leased the site to several different oil, gas, and mineral recovery companies.

When King County began working on the Enumclaw Community Plan in the late 1980s, Palmer provided detailed information regarding mineral resource properties it owned in the Enumclaw planning area (see Nov. 19, 1987 letter to Carol Lumb, King County Planning, and July 8, 1988 letter plus attachments to Tom Fitzpatrick, King County Planning and Community Development). Palmer's mineral resources were identified by Section-Township-Range, then cross-referenced through tax account numbers, resource type (i.e. coal, oil, natural gas, sand & gravel, and quarry rock), with approximate acreages for each. Highlighted King County Kroll maps were attached to illustrate the specific properties. Palmer provided significant comment and background information during the writing of the plan. Palmer communicated frequently with planners who sought information and strategies for developing the mineral and mining policies later adopted in the July 1990 Enumclaw Community Plan. Several Palmer properties were designated as existing and potential extraction sites (see Enumclaw Community Plan, 1990 – Mineral Resource and Existing / Potential Extraction Sites, page 63, together with highlighted close-up focused on Palmer's current Lot Q rezone).

In Oct 1991, Wheeler Topsoil, Inc. applied for a grading permit under a lease from Morris & Sons, Inc. for portions of their property historically used or planned for mining (and formerly owned by Palmer). King County's Building and Land Development (BALD) division reviewed the application and on Jan. 7, 1992, recommended a Mitigated Determination of Non-Significance (MDNS) be issued for the project. BALD also determined the property was entitled to grading permits for mining under a legal, nonconforming use. An appeal was filed against the decision by Doreen Johnson of the Plateau Preservation Society. The case was heard by the Office of Zoning and Subdivision Examiner on Nov. 12, 1992 under File No. C9102861. The Hearing Examiner's decision was issued Dec. 9, 1992.

The appeal was denied and the grading permit was recommended for conditional approval, and eventually issued.

In August 1994, Palmer's representative, Mark Abernathy met with Randy Sandin, Supervisor at King County Dept. of Development and Environmental Services (DDES) requesting a determination of historic mining uses for the Hyde Gravel site in Section 30 (see Aug. 23, 1994 letter to Randy Sandin with attachments). During the meeting, Sandin requested additional information consisting of detailed maps and evidence that mining commenced before the establishment of zoning in 1958. Palmer assisted Abernathy in preparing the requested materials. Abernathy followed with a Sept. 9, 1994 letter accompanied by a detailed three-page chronology plus a 3-ring binder with ten supporting exhibits (see Sept. 9, 1994 letter to Randy Sandin with lists of attachments).

Abernathy, together with Palmer and its attorney, Joel Haggard met with Gary Kohler and Sandin on Nov. 28, 1994 at the DDES office in Bellevue. On January 11, 1995, King County DDES issued 14 findings, including Finding Nos. 1 and 2 as follows:

1. Palmer Coking Coal Company (Palmer) owner intends to pursue a grading permit to remove sand, gravel, and sandstone from the property.
2. The site is approximately 27 acres lying south of an active sand and gravel mine operated by Wheeler Topsoil, Inc. (King County Grading Permit #3496-778).

The Report and Decision reached five conclusions resulting in the following decision:

"The eastern 1,320 feet of the Palmer Coking Coal site, tax lots #302107-9037 and #302107-9040 is a nonconforming site for the excavation, screening, crushing, and stockpiling of materials. Any operation of the site will be subjected to a King County grading permit."

– Signed: Gary G. Kohler, January 11, 1995

(see DDES Report and Decision – Palmer Coking Coal – Nonconforming Status dated January 11, 1995 consisting of the three-page decision and a color-coded exhibit map).

The legal descriptions for tax parcels #302107-9037 (Parcel 15-G) and #302107-9040 (Parcel 19-G) had been prepared by Geo Dimensions, Inc. on Oct. 22, 1991 under GDI Job. No. 91005 (see Oct. 24, 1991 letter from Geo Dimensions with

attachments). The legal descriptions were approved and adopted by the King County Assessor pursuant to Palmer's approved large lot segregation (see Palmer letter dated Aug. 7, 1992; stamped received by the Dept. of Assessments on Aug. 11, 1992; and returned to Palmer by Phillis Jackson). The color-coded map of those two tax parcels was part of Palmer's earlier submittal package to Sandin (see Historic Mining Use, SW 1/4, Sec. 30-21N-7E, Exhibit 2).

Over the two years following King County's legal, non-conforming use decision, Palmer prepared detailed information required for a grading permit. Simultaneously, Palmer applied to the Dept. of Natural Resources (DNR) for a state Surface Mining Permit. Applications for both grading and mining permits were submitted to King County DDES and State DNR in Sept. 1997. The maps submitted by Palmer showed the same site configuration as approved by DDES's Gary Kohler in Sept. 1995 (see Nov. 6, 1997 letter to Fred White from DNR and King County Pre-Ap Meeting A97M0352, together with proposed mine maps prepared by Palmer). The site was not formally surveyed but was estimated by someone to be 22+/- acres during those permitting processes. It is not known who made that estimate or why it differed from the DDES's 27-acre findings in January 1995.

In October, King County requested additional information and studies. The State DNR did the same in November. Palmer applied for permits from Puget Sound Air Pollution Control Agency and Washington Dept. of Ecology in Nov. 1997.

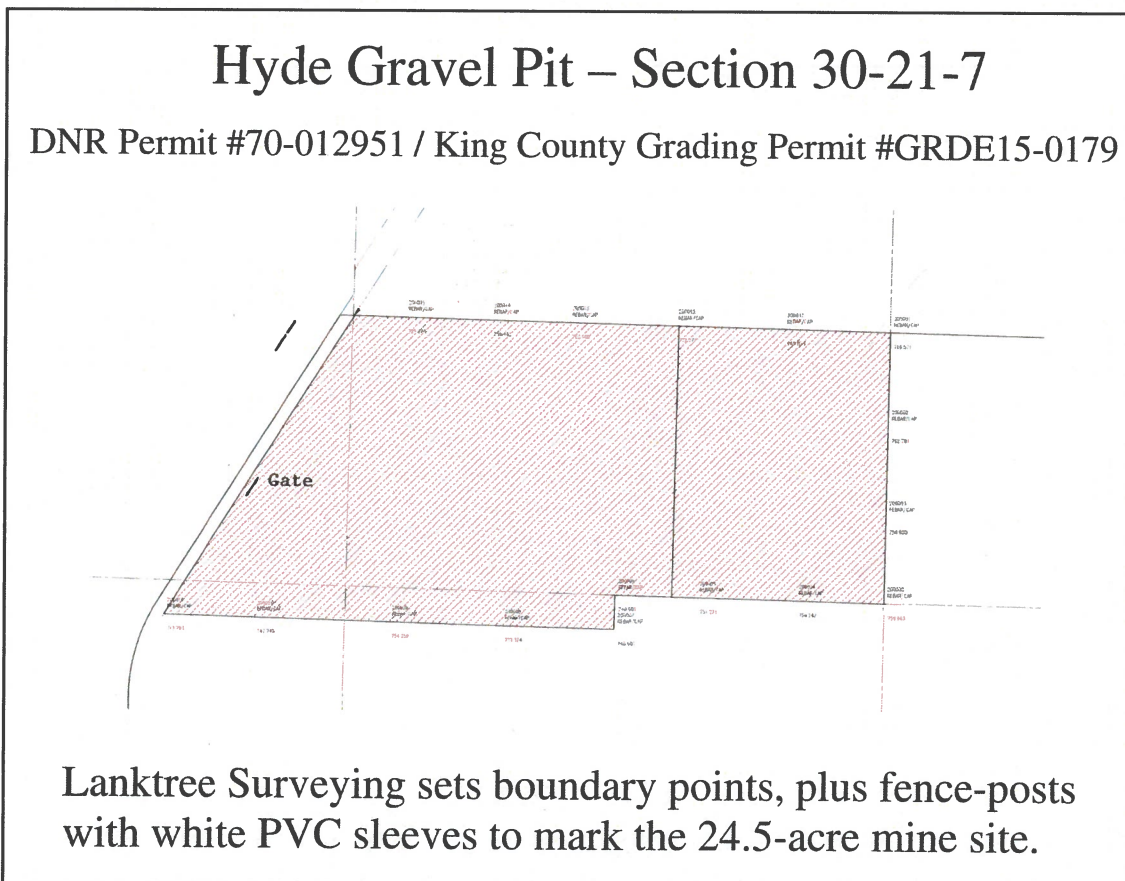
On Feb. 9, 1998, King County accepted the application as complete. On July 2, July 27, and Sept. 25, 1998, Palmer submitted written inquiries requesting timely review of Palmer's completed application. No response was received to any of Palmer's requests. On Nov. 29, 1998, Palmer submitted a formal complaint to King County for failure to complete review during the required 120-day review period. King County responded 30 days later stating SEPA review was underway. A Notice of Application was advertised on Feb. 17, 1999 and the MDNS completed. However, the MDNS was not yet issued. More delays occurred and additional information was provided. Finally, on Oct. 20, 1999, Craig Comfort of DDES wrote a memo to Ramon Locsin stating that DDES recommends, "You can now approve this project." A MDNS for Hyde Gravel was issued on Oct. 26, 1999 under Files No. E98E0220 and L98G0056. Two appeals to the MDNS were filed in November.

An appeal hearing was heard by the Office of Hearing Examiner on March 2 and 3, 2000. During the hearing, William Kombol, Manager presented testimony outlining steps and efforts taken by Palmer to ensure compliance with King County's planning and regulatory goals (see March 1, 2000 testimony by William Kombol). The Hearing Examiner followed DDES's recommendation and denied the appeals allowing further review of the permit and ultimate approval. On Aug.

1, 2000, King County DDES issued Grading Permit L98G0056. On Sept. 5, 2000, State DNR issued Surface Mining Permit No. 70-012951. Both permits for Hyde Gravel have since been regularly renewed on an annual or biennial basis.

As to the varying size estimates applied to the mining area, it is not clear from where the earlier 27-acre or later 22+/- acre figures were derived. Neither were correct. There are several possible reasons why those estimates were off. Early King County Assessor maps carried imprecise locations for the Enumclaw-Franklin Road, which possibly impacted the size of the site. Later surveying in Section 30 no doubt provided more detailed information for acreage calculations within the overall section. And, possibly inexperience or human error in estimation may have contributed to each miscalculation.

In January 2020, Palmer retained Lanktree Land Surveying to stake the boundaries of the mine site boundaries approved by DDES as a legal, non-conforming use and subsequently issued grading permit. Lanktree's survey of the staked boundaries determined the site contained 24.5 acres (see Trevor Lanktree statement dated Feb. 10, 2021). A copy of Lanktree's survey map is attached and shown below. It is also shown on the attached Lot Q site map. Lot Q was established under Boundary Line Adjustment No. BLAD 18-0014.



Attachments:

- ◆ November 18, 1987 letter to Carol Lumb
- ◆ July 8, 1988 letter to Tom Fitzpatrick with attachments
- ◆ Enumclaw Community Plan, 1990 – Mineral Resource & Existing / Potential Extraction Sites, page 63 (11” x 17”)
- ◆ Highlighted close-up of page 63 focused on Palmer’s Lot Q rezone
- ◆ October 24, 1991 Geo Dimensions letter with attachments
- ◆ August 7, 1992 letter to Dept. of Assessment, stamped and returned to Palmer
- ◆ August 23, 1994 letter to Randy Sandin with attachment
- ◆ September 9, 1994 letter to Randy Sandin with attachments
- ◆ January 11, 1995 DDES Report and Decision by Gary G. Kohler
- ◆ Historic Mining Use Map, SW 1/4 Sec. 30-21N-7E, Exhibit 2
- ◆ November 6, 1997 letter to Fred White with attachments (some 11” x 17”)
- ◆ March 1, 2000 testimony by William Kombol before Hearing Examiner
- ◆ Lot Q Site Map with Hyde Mine highlighted in yellow (11” x 17”)
- ◆ Trevor Lanktree Statement dated February 10, 2021 with Exhibit A
- ◆ Hyde Gravel survey map with King County & DNR permit numbers



King County

**Docket Form
King County Comprehensive Plan**

DATE OF SUBMITTAL: May 29, 2015

NAME: PALMER COKING COAL COMPANY, LLP

ADDRESS: P.O. BOX 10 / 31407 HWY 169, BLACK DIAMOND, WA 98010

PHONE (include area code): 425-432-4700 **EMAIL:** PalmerCokingCoal@aol.com

KC COUNCIL DISTRICT NO (optional): 9

TYPE (please check one): COMPREHENSIVE PLAN SEE ATTACHED
DEVELOPMENT REGULATION

DESCRIPTION OF DOCKETED ITEM:

REZONE OF 20 TAX PARCELS TOTALING 321 ACRES LOCATED IN SECTION 30,

TOWNSHIP 21 NORTH, RANGE 7 EAST, W.M. GENERALLY WEST OF THE

ENUMCLAW-FRANKLIN ROAD TO MINERAL "M" ZONING. THE SUBJECT

PROPERTY IS DIRECTLY ADJACENT TO AND SURROUNDS A 130-ACRE PROPERTY

RECENTLY REZONED TO "M". A PORTION OF THE SUBJECT PROPERTY IS A

PERMITTED SURFACE GRAVEL MINE UNDER STATE DNR PERMIT #70-012951 AND

KING COUNTY PROJECT #L98G0056 / ACTIVITY #L11GI-267. THE SUBJECT IS

ALREADY LISTED AS POTENTIAL MINERAL RESOURCE UNDER THE COMP. PLAN

ALL COMPLETED FORMS RECEIVED BY THE COUNTY WILL BE SENT TO THE DEPARTMENT OF DEVELOPMENT AND ENVIRONMENTAL SERVICES. SEE THE FOLLOWING PAGE FOR ADDITIONAL INFORMATION & MAILING ADDRESS. THIS DOCKET FORM CAN ALSO BE SUBMITTED ELECTRONICALLY BY VISITING THE KING COUNTY WEB SITE AT:

<http://www.kingcounty.gov/exec/PSB/RegionalPlanning/KingCountyCompPlan.aspx>

For Department Use only:

Docket No. _____

Response: Comprehensive Plan Amendment Required? Y/N

Preliminary Recommendation:

King County Docket Information

RCW 36.70A.470 [abbreviated] Docketing means compiling and maintaining a list of suggested changes to the comprehensive plan or development regulations in a manner that will ensure such suggested changes will be considered by the county and will be available for review by the public. The County's development regulations shall include a procedure for any interested person to suggest plan or development regulation amendments. The suggested amendments shall be considered on at least an annual basis. Deficiency in a comprehensive plan or development regulation refers to the absence of required or potentially desirable contents of a comprehensive plan or development regulation.

The county defines "Docket" in KCC 20.08.107 as follows: "Docket" (noun) means the list of suggested changes to the comprehensive plan or development regulations maintained by the department. "Docket" (verb) means to record with the department a suggested change to the comprehensive plan or development regulations.

The planning code in Title 20 contains a section on the docket process. Please refer to KCC 20.18.140 for specific code language. A summary of this section follows:

"Docket" means the list of suggested changes to the comprehensive plan or development regulations maintained by PSB (Office of Performance, Strategy and Budget). PSB coordinates, reviews, makes recommendations and makes this information available to the public. All county offices with comprehensive plan or development regulation responsibilities will make docket forms available to the public. September 30th is the annual docket deadline. PSB forwards to the King County Council a complete docket with an initial Executive recommendation for each item on the first business day of December each year.

The docket process specifies that it is not just to note deficiencies, but also to suggest changes and make written comments. These suggested changes are reviewed by the county and made available for review by the public. Information provided to the public will include the county's response. An Internet docket process is available and can be found at:

<http://www.kingcounty.gov/exec/PSB/RegionalPlanning/KingCountyCompPlan.aspx>.

There is no fee for submitting the docket form.

Docket forms may be mailed to:

Comprehensive Planning Manager
Office of Performance, Strategy and Budget
Office of King County Executive Dow Constantine
401 Fifth Avenue, Suite 810
Seattle, WA 98104

OR

Send via email to:

CompPlan@kingcounty.gov

Mineral (M) Zoning Proposal: 2015 Comp. Plan Docket Request

Property: This property consists of twenty tax parcels totaling 321 acres located in Section 30, Township 21 North, Range 7 East, W.M, generally west of the Enumclaw-Franklin Road. The property is directly adjacent to and surrounds a 130 acre property which was recently rezoned to Mineral (M). Since adoption of the Enumclaw Community Plan and Area Zoning which was later incorporated into the King County Comprehensive Plan, this property has been listed as an Existing / Potential Mineral Resource and Extraction Site. A portion of the property is permitted as a surface gravel operation under State DNR Permit No. 70-012951. The permitted gravel pit operates as a legal non-conforming use pursuant to a Clearing/Grading Permit from King County DPER under Project No. L98G0056 / Activity No. L11GI-267. The approximate address is 36300 S.E. Enumclaw-Franklin Road, Enumclaw, WA 98022.

Soils: Everett Series (EvC) soils consisting of a well drained substrata of very gravelly sand within a very gravelly glacial outwash deposit. Everett glacial outwash deposits are commonly used for sand and gravel mines. There is a continued need for good quality aggregates throughout the greater Puget Sound region.

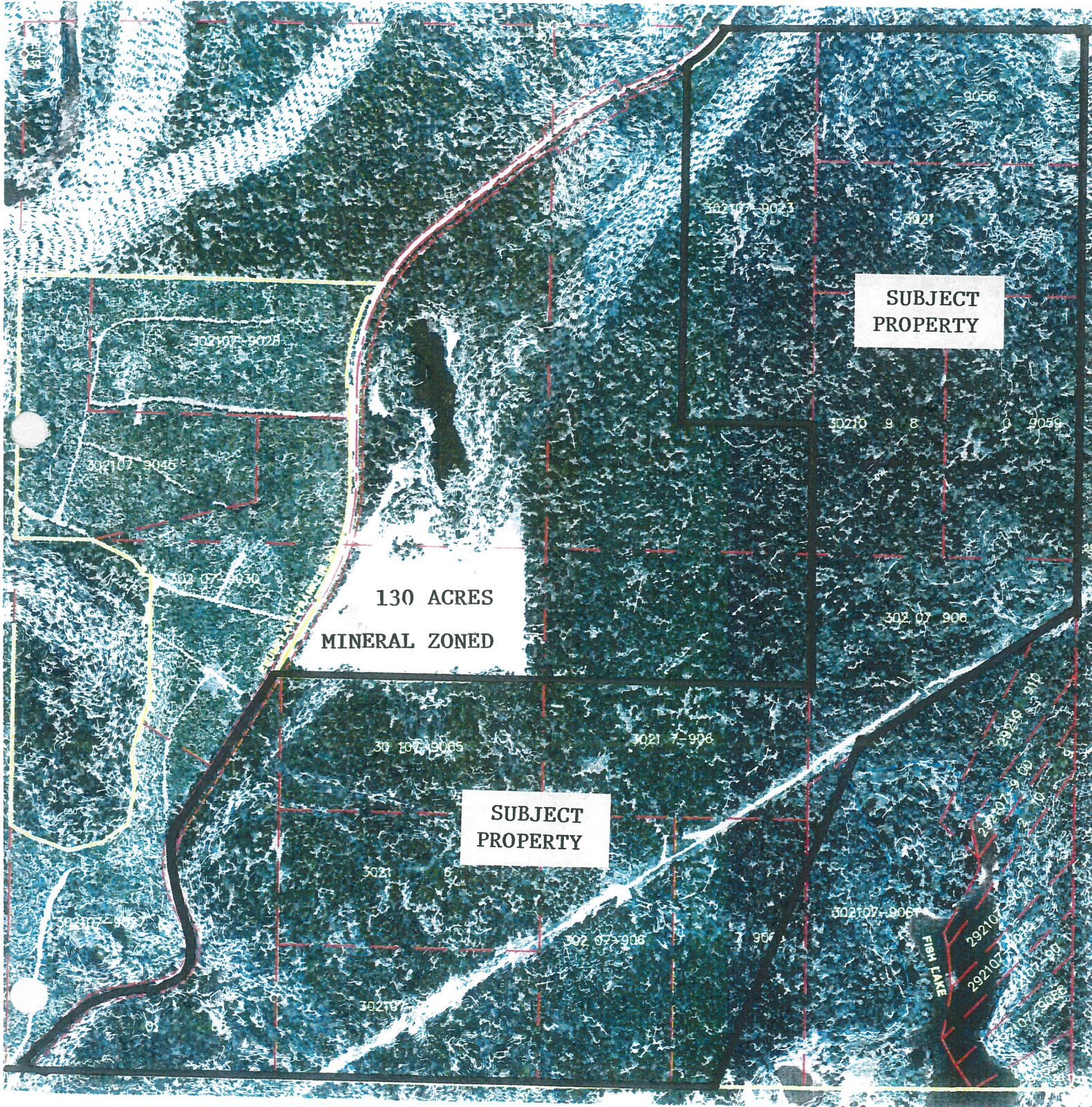
History: The property has historically been used for timber production and surface mining. From the 1950s through the early 1970s portions of the property were used for a silica sand mine operated by Smith Brothers Silica Sand Co., Inc. of Auburn. From 1969 through 1975, King County Public Works was granted several leases to store, stockpile, and remove gravel from the site. In 1971, the property was segregated into two ownerships: the 130 acre property was acquired by Morris & Sons, while the remaining 321 acres were retained by Palmer Coking Coal Co. Inc. In 1981 efforts were undertaken to remove stockpiled crushed gravel from the property and subsequent removal for site specific projects were completed through the 1989. From 1979 through the 1990s, the site was leased to a series of oil, gas, and mineral recovery companies. In the early 1990s two separate processes before hearing examiners established legal non-conforming use classification obtained for both properties following submission of evidence of on-site mining dating back to before 1958. Separate state surface mining permits, King County grading permits, and other relevant permits were obtained for both properties and have been continually renewed. In 2015, a rezone to Mineral (M) was granted to the 130 acre property by King County Ordinance 17981.

Tax Parcels: The following twenty tax parcels are associated with the 321 acre property owned by Palmer Coking Coal Company, LLP:

302107-9023; 302107-9056; 302107-9057; 302107-9058; 302107-9059; 302107-9060; 302107-9061; 302107-9062; 302107-9063; 302107-9064; 302107-9065; 302107-9066; 302107-9067; 302107-9068; 302107-9076; 302107-9077*; 302107-9078*; 302107-9079; 302107-9080; 302107-9081.

* Note: Two tax parcels (302107-9077 and 302107-9078) will be reconfigured by way of a boundary line adjustment (BLA) or other process, so that the water body known as Fish Lake and it associated wetlands will be excluded from this rezone proposal. Please see attached map for a generalized outline of the proposed rezone property.

Mineral (M) Zoning Proposal 2015 Comprehensive Plan Update





King County

Executive Office of Performance, Strategy and Budget

401 5th Ave, Suite 800

Seattle, WA 98104

206-263-9600 TTY Relay: 711

November 18, 2015

Palmer Coking Coal Company
31407 Highway 169
Black Diamond, WA 98010

Dear Palmer Coking Coal Company,

Thank you for participating in this year's docketing process for the King County Comprehensive Plan. We appreciate hearing from you.

Overview

The docket process¹ is available to the public to identify a deficiency (i.e., an absence of required or potentially desirable contents) or to propose changes to the Comprehensive Plan's policies, area-wide land use designations, development regulations, and site-specific land use and zoning. For docket requests that require a site-specific change in a land use designation or zoning classification, submitters are referred to the appropriate process for obtaining these site-specific changes.² As your docket form was submitted by the **June 30** deadline, it is under consideration in the 2016 amendment to the Comprehensive Plan.

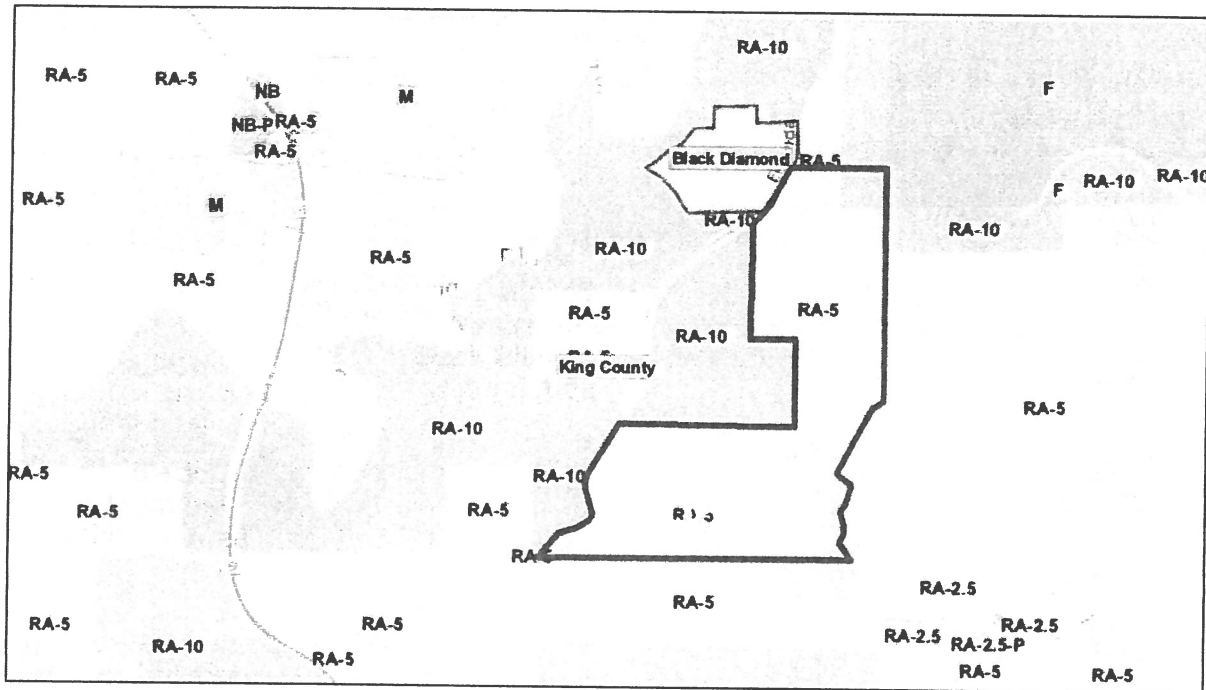
Request

The request is to rezone 20 tax parcels generally west of the Enumclaw-Franklin Road from Rural Area-5 to Mineral zoning. The docket form notes that some tax parcels would need to be reconfigured by way of a boundary line adjustment or other process so that the body of water known as Fish Lake and its associated wetlands would be excluded from this rezone proposal. The form further notes that the property is directly adjacent to and surrounds a 130-acre property that was recently rezoned to Mineral and is a permitted surface gravel mine under state Department of Natural Resources permit #70-012951 and KC Project #L98G0056/Activity #L11GI-267. Last, it notes that the property is already listed as a potential mineral resource land in the Comprehensive Plan.

¹ http://www.kingcounty.gov/property_permits_codes_growth/CompPlan/amend.aspx, and http://www.kingcounty.gov/council/legislation/ke_code.aspx at 20.18.140

² King County Code 20.18.050

Map of Docket Area



Discussion

The Comprehensive Plan includes policies and provisions related to mineral resource lands in *Chapter 3: Rural Areas and Natural Resource Lands*, in the Mineral Resources subsection, starting on page 3-65. The Plan includes a Mineral Resources Map that shows Potential Mineral Resource Sites. These are sites where King County expects some future surface mining to occur or where the owner or operator indicates an interest in future mining. Policies relevant to this docket request are noted below.

R-680 King County shall designate as mining on the Comprehensive Plan Land Use Map those sites that had Potential Mineral (M) zoning prior to the date of adoption of the 1994 Comprehensive Plan and those sites that had Mineral zoning as of the date of the adoption of the King County Comprehensive Plan 2000 Update.

A mining designation on the Land Use Map shall not create a presumption that Mineral zoning will be approved for sites with Potential Mineral zoning. Potential Mineral zoning shall not be applied to additional sites.

R-681 King County may designate additional sites on the Comprehensive Plan Land Use Map as Mining only following a site-specific rezone to Mineral zoning. Upon approval of a rezone to Mineral zoning, the Comprehensive Plan Land Use Map shall be amended to designate the site as mining during the next comprehensive plan amendment cycle. King County should approve applications for site-specific rezones to Mineral zoning and applications for permits that would authorize mineral extraction and processing only following site-specific environmental study, early and continuous public notice and comment opportunities, when:

- The proposed site contains rock, sand, gravel, coal, oil, gas or other mineral resources;
- The proposed site is large enough to confine or mitigate all operational impacts;

- c. The proposal will allow operation with limited conflicts with adjacent land uses when mitigating measures are applied;
- d. The proposal has been evaluated under the State Environmental Policy Act so that the county may approve, condition or deny applications consistent with the county's substantive SEPA authority, and in order to mitigate significant adverse environmental impacts.
- e. Roads or rail facilities serving or proposed to serve the site can safely and adequately handle transport of products and are in close proximity to the site.

King County's Natural Resource Lands contribute to the economic prosperity of the region. They are the lands with long-term commercial significance for farming, forestry, and mining. Businesses that rely on resource lands provide jobs and products, such as food, wood, and gravel. They also are an important part of our cultural heritage and this is noted in other policies in *Chapter 3*. At the same time, protecting surrounding uses from the impacts of mineral extraction are an important part of the Comprehensive Plan's approach to balance economic activity with environmental protection, such as in Policy R-205, R-607 and the remaining policies in the Mineral Resources section noted above.

While mining and other resource-based industries are components of the character of the Rural Area, policies in the Comprehensive Plan address potential conflicts between commercial mining operations and established residences.

R-684 The preferred adjacent land uses to sites designated as Mining on the Land Use Map are mining, industrial, open space or forestry uses. Sites for newly proposed Mineral zones shall not be adjacent to or within Agricultural Production Districts. Agricultural lands and operations should be protected from significant impacts associated with nearby mine operations.

R-685 Mining activities are permitted within the Forest Production District, consistent with R-620. However, a conditional use permit shall be required for mining activities in the Forest Production District located within one-quarter mile of established residences or for proposals seeking to use local access streets where abutting lots are developed for residential use.

All of the lands adjacent to the subject parcels are already either zoned Mining or are enrolled in current use taxation as "forest land." These lands are all designated as potential mine sites in the current Comprehensive Plan and a portion of the area proposed for rezone is included in the Plan's Mineral Resource Map as a Legal Non-Conforming Mineral Resource Site (site 110).

Additionally, the subject parcels have included mining operations in the past. Changing the zoning and land use to allow for mining will allow the property owners to bring operations into compliance with current regulations. Further, during the review process, the county, through State Environmental Policy Act review and county regulations, will be able to condition approval in a manner that mitigates adverse environmental impacts and impacts to surrounding properties.

Recommendation

With this information in mind, including the provisions and criteria noted in this section, the next step to move your request forward is to file for a Site Specific Zone Reclassification – guidance on how to start the Zone Reclassification process can be found at <http://your.kingcounty.gov/permits/info/landuse/rezone.aspx>.

Palmer Coking Coal
November 18, 2015
Page 4

Please be aware that Rezones include a pre-Application conference, a formal application and a filing fee. Rezones are a Type 4 decision that includes review by the Hearing Examiner and action by the County Council. However, zone reclassifications that do not require a Land Use Amendment are a separate action from the Comprehensive Plan, which provides you more flexibility in terms of timing.

Next Steps

Last, in accordance with King County Code Title 20, a report of all docket items that were submitted by June 30 will be included in a report sent to the King County Council on the first business day of December.

If you have further questions or concerns, please contact Ivan Miller, Comprehensive Plan Manager, at (206) 263-8297 or via email at ivan.miller@kingcounty.gov.

Again, thank you for participating in this year's docketing process.

Sincerely,

A handwritten signature in black ink that reads "Lauren Smith". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Lauren Smith
Director, Regional Planning

cc: John Starbard, Director, Department of Permitting and Environmental Review

Ivan Miller, Comprehensive Plan Manager, Office of Performance, Strategy and Budget

Bennett Consulting, PLLC
Engineering and Mining Geology

January 11, 2017

Project No. GBC16-01

Bill Kombol
Palmer Coking Coal Company
31407 Highway 169
Black Diamond, Washington 98010

Subject: Results of Gravel Exploration Drilling
Franklin Ridge-Fish Lake Parcels
King County, WA

Dear Bill:

This report presents the results of the exploration drilling for gravel resources on your Fish Lake-Franklin Ridge parcels in eastern King County, Washington. The drilling was designed to better define existing gravel reserves and gather subsurface data for future mine permitting. A total of 532 feet of drilling was completed in five holes, ranging in depth from 61 to 146 feet, and four ground water monitoring wells were installed. Ground water was encountered at depths ranging from 42 feet in drill hole FR-4, down to a depth of 136 feet in FR-1. Mineable widths of sand and gravel ranged from a thickness of about 35 feet in drill hole FR-4 up to a thickness of about 130 feet in drill hole FR-1.

The attached Figure 1 shows the locations of the drill holes, and Figure 2 displays geologic cross sections. It should be noted that the Fish Lake-Franklin Ridge parcels are adjacent to the existing Franklin Ridge gravel mine, currently idle, on its south and east sides. Some of the geologic and ground water data from that project was used in constructing the geologic cross sections for this report.

SONIC CORE DRILLING

The drill rig for the project was a truck mounted Boart-Longyear sonic core drill that used a 7-inch diameter bit and retrieved a 6-inch diameter continuous core. Samples are retrieved at 10-foot intervals by extracting the entire length of drill pipe. In lieu of core boxes, samples were placed in specially designed plastic bags; typically between 3 and 4 bags were required for each 10-foot length of sample, depending on core recovery. The samples were logged and photographed in the field and representative samples were collected for further analysis as necessary. Logs for the drill holes are attached to this report and contact sheet prints of the core photos are also included. Due to the large number of core photos only the contact prints were printed for this report. However, a flash drive with all the core photos has been included so that full scale digital pictures will be available for future work on the project.

GEOLOGY ENCOUNTERED

The geologic units encountered in the drilling are displayed on the attached cross sections. From oldest (bottom of drill hole) to youngest (top of hole) the units consisted of Renton formation sandstone bedrock (Tr), Pre-Vashon lodgment till (Qpvt), Vashon advance outwash (Qva), Vashon lodgment till (Qvt), and Vashon recessional outwash (Qvr), as described in the following sections.

Renton Formation Bedrock (Tr)

This unit was encountered at the base of drill holes FR-4 and FR-5 and is interpreted to underlie the entire study area at depth. The Renton formation consists of sandstone, siltstone and shale that was deposited in a low gradient fluvial delta to floodplain environment during the Eocene epoch about 45 million years ago. This unit is host to the coal beds of King County as well as silica sand deposits. High silica sand was encountered in one hole, FR-5, at a depth of 53 feet (Figure 2).

Pre-Vashon Lodgment Till (Qpvt)

An older glacial till unit of unknown age was encountered at the base of drill hole FR-2 at a depth of 135 to 146 feet (Figure 2). This unit consisted of a very dense, unsorted, gravelly silty sand similar in appearance and character to the more recent Vashon lodgment till (described below), but obviously older since it underlies the units that underlie the Vashon till. There have been many ice advances into the Puget Lowland over the last 2 million years and further investigation would be required to determine which glacial advance left behind this older till unit.

Vashon Advance Outwash (Qva)

About 19,000 years ago, the Vashon glacial ice sheet advanced from the Fraser Valley in Canada into the Puget Lowland. Huge amounts of sand and gravel were deposited in front of the advancing ice by sediment laden meltwater streams in a braided stream environment. Because these sediments were deposited in front of the advancing ice sheet they are referred to as Vashon advance outwash or Qva on Figures 1 and 2. These sand and gravel deposits were later overridden by the ice sheet and consolidated to a dense state by the weight of the ice which reached an estimated thickness of more than 3,000 feet in this area.

Vashon advance outwash sediments can be more than 100-feet thick; they form an important aquifer in King County and can also be an important source of aggregate where they occur above the regional water table. At the Fish Lake-Franklin Ridge parcels this unit was encountered from 81 feet to 141 feet in FR-1, from 74 feet to 135 feet in FR-2, and from 53 feet to 112 feet in FR-3 (Figure 2). Because most of these thicknesses lie well above the local water table, they should be considered mineable reserves.

Vashon Lodgment Till (Qvt)

Immediately overlying the advance outwash is a dense unsorted mixture of sand, silt and gravel known as Vashon lodgment till (Qvt), which was deposited about 15,000 years ago at the sole of the advancing ice sheet. The highly consolidated nature of till is also attributed to glacial compaction, and this unit typically forms an impermeable barrier or aquitard which restricts ground water flow due to its high silt content. Lodgment till caps many of the uplands of the Puget Sound region and can be more than 60-feet thick. This unit was encountered below the surface in all the drill holes at both sites, except where it was absent in hole FR-4 (Figures 1 and 2).

Till is not normally economical to mine, however it can form an important source of structural fill for construction projects when placed under optimal moisture conditions during the dry times of the year. At the Fish Lake-Franklin Ridge parcels the till ranged in thickness from about 3 feet in FR-3, up to 11 feet thick in FR-2. As discussed above the till was absent in FR-4 (Figure 2). Because the till is relatively thin at the Fish Lake-Franklin Ridge parcels, relative to the gravel thicknesses, it should not appreciably hinder mining operations here.

Vashon Recessional Outwash (Qvr)

The large meltwater streams emanating from the *receding* Vashon ice sheet also deposited large amounts of sand and gravel across the Puget Lowland and these are referred to as Vashon recessional outwash (Qvr). Recessional outwash is the most important source of sand and gravel aggregate in the Puget Sound region. Because this unit was not overridden and consolidated by glacial ice, it is less dense than advance outwash or till. This unit was encountered at the surface in all the drill holes from the surface down to depths ranging from 44 feet in FR-5 to a depth of 76 feet in FR-1. Nearly all of these thicknesses should be mineable. And, in the areas around drill holes FR-1, FR-2 and FR-3, appreciable thicknesses of advance outwash sand and gravel should also be mineable beneath the recessional outwash.

POTENTIAL RESOURCES

A calculation of sand and gravel ore reserves defined by the drilling was beyond the scope of this project and would require a preliminary mining plan to delineate. However, substantial sand and gravel reserves exist on the subject parcels. Each foot of gravel encountered in the drilling represents 1,633 cubic yards of reserves when projected out to a one acre area (1 foot x 43,560 square feet/acre divided by 27 cubic feet per yard). Thus a 50-foot gravel intercept would represent 81,650 cubic yards per acre (50 feet x 1,633 cubic yards/foot). Using an in-bank bulk density of 1.65 tons/cubic yard, such an intercept would represent 134,722 tons per acre.

Thank you for the opportunity to work with you on this project. If you have any questions or need further information, please feel to call or send an e-mail.

Sincerely Yours,
Bennett Consulting PLLC



George H. Bennett P.G.
Licensed Professional Geologist

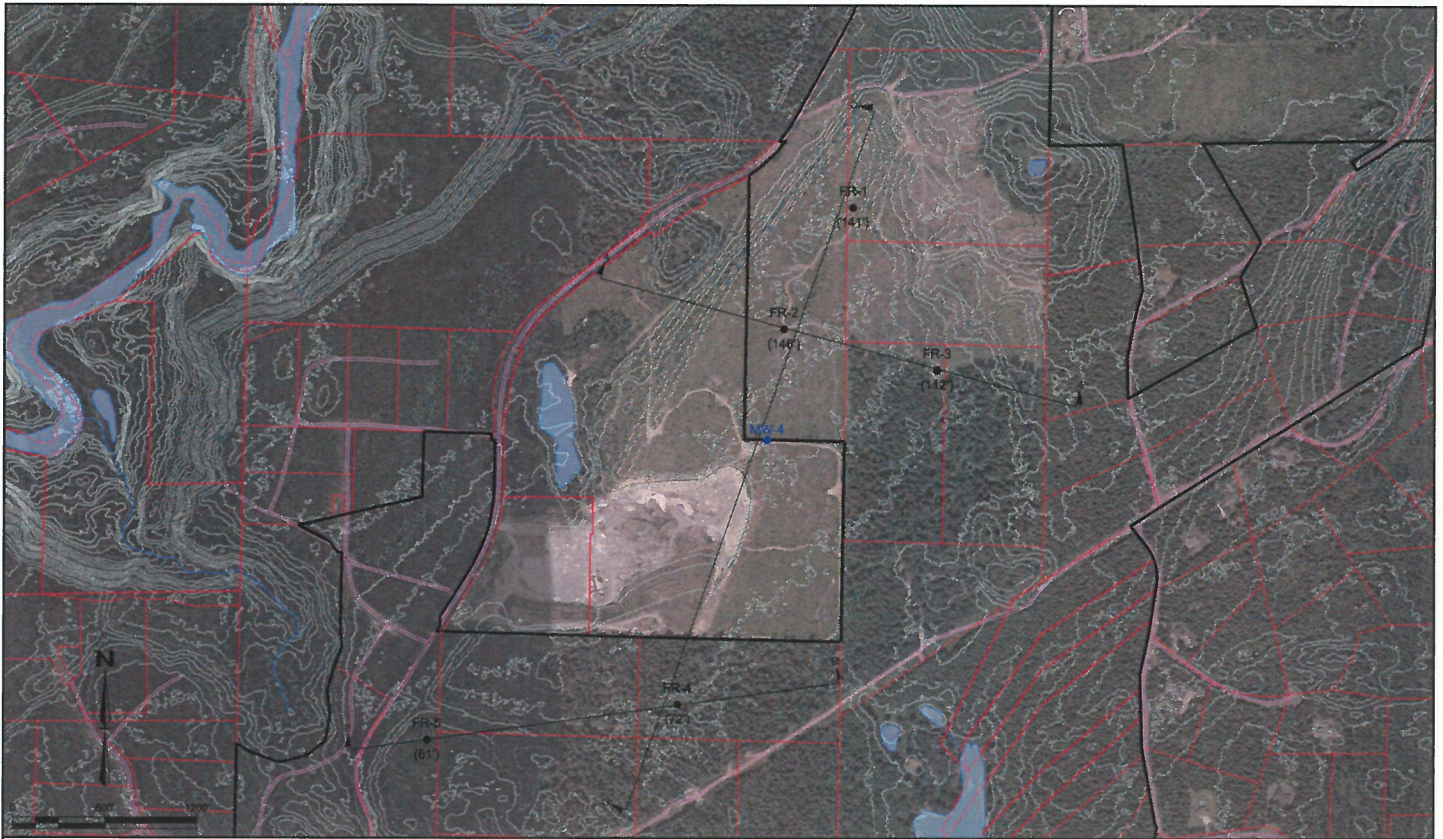
SELECTED REFERENCES

Harris, C. and Schuster, J.E., 2000, *1:100,000-Scale Digital Geology Map of Washington*, Washington State Department of Natural Resources, Division of Geology and Earth Resources.

Jones, M. A., 1999, *Geologic Framework for the Puget Sound Aquifer System, Washington and British Columbia* U.S.G.S. Professional Paper 1424-C.

Tabor, R.W., Frizzell, V.A. Jr, Booth, D.B., and Waitt, R.B., 2000, *Geologic Map of the Snoqualmie Pass 30 x 60 Minute Quadrangle, Washington*. U.S. Geological Survey, Geologic Investigation Series, Map I-2538.

Washington Aggregate and Concrete Association, 2003, *The Aggregates Industry in Washington*, Pacific Lutheran University School of Business, 28p.

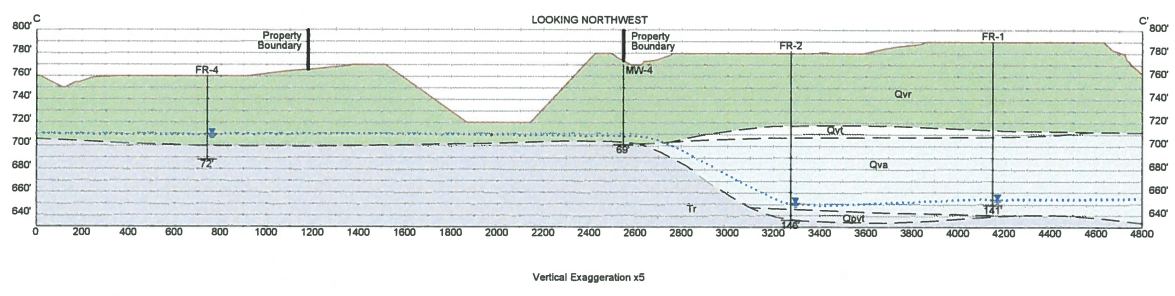
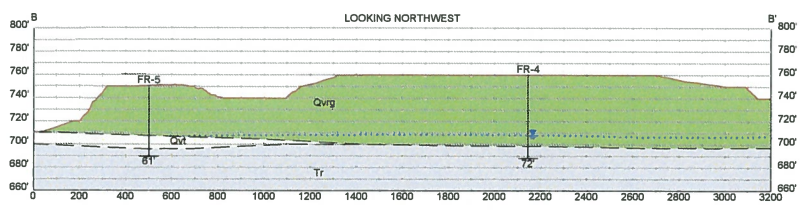
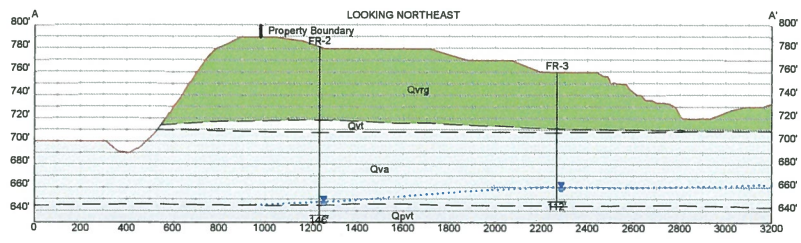


LEGEND

- Property Boundary
- Parcels
- Roads
- Drill Holes

DESIGNED	SCALE	1"=600'
DATE 01-27-16	Bennett Consulting, PLLC 46129 SE 130th Street North Bend, WA 98045 (425) 785-8390	
BY GHB		
DRAWN		
DATE 01-27-16		
BY JLL		

Figure 1
Franklin Ridge
Site Map



Vertical Exaggeration x5

LEGEND = Property Boundary = Existing Surface = Ground Water Table	= Vashon Recessional Outwash = Vashon Recessional Gravel = Vashon Lodgement Till = Vashon Advance Outwash = PreVashon Till	= Drill Hole & Depth 74' = Renton Formation Sandstone Bedrock	DESIGNED DATE 01-27-16 BY GHB	SCALE H:1"=400' V:1"=80' Bennett Consulting, PLLC 46129 SE 130th Street North Bend, WA 98045 (425) 785-8390	Figure 2 Franklin Ridge Cross Sections
			DRAWN DATE 01-27-16 BY JLL		

C:\Users\Jack\AppData\Local\Temp\A\Pub\1432\1432\FCC Franklin Ridge.dwg - Jan 27, 2016 - 10:06pm

Drill Hole Logs

Drill Hole Log

Bennett Consulting PLLC


Hole No. FR-1

Depth 141'

46129 SE 130th Street
 North Bend, WA 98045
 Phone: (425) 785-8390
 Fax: (425) 831-4690

Project Name: Franklin Ridge
 Project Number: GBC06-14
 Drilling Method: Sonic
 Sampling Method: Core

Contractor: Cascade
 Elevation: 785
 Azimuth & Dip: -90
 Hole Diam: 6 inches

Depth	Graphic	Geologic Description	Well Completion
10		Medium dense, moist, brownish gray, sandy gravel, some cobbles and local large boulders. Vashon Recessional Outwash (Qvr). Lenses of gravelly coarse sand 24'-34' and 70-76', large boulder 66-70'	Monitor well not installed
20			
30			
40			
50			
60		Dense, moist, gray, gravelly silty sand. Vashon Lodgment Till (Qvt)	
70			
80		Dense, moist to wet with depth, gray, sandy gravel with some cobbles and local boulders. Vashon Advance Outwash (Qva). Silty, till-like zone 87-90, boulders 87-90, 98-100 and 106-111.	
90			
100			
110			
120			
130		b.o.h. 141'	
140			
150			Static water level 136.2 below ground surface 
160			

Drill Hole Log

Bennett Consulting PLLC

Hole No. FR-2

Depth 146'

46129 SE 130th Street
 North Bend, WA 98045
 Phone: (425) 785-8390
 Fax: (425) 831-4690

Project Name: Franklin Ridge
 Project Number: GBC06-14
 Drilling Method: Sonic
 Sampling Method: Core

Contractor: Cascade
 Elevation: 775
 Azimuth & Dip: -90
 Hole Diam: 6 inches

Depth	Graphic	Geologic Description	Well Completion		
10		Medium dense, moist, brownish gray, sandy gravel, some cobbles and local large boulders. Vashon Recessional Outwash (Qvr). Lenses of gravelly coarse sand 24'-34' and 70-76', large boulder 66-70'			
20					
30					
40					
50					Backfilled with Drill Cuttings
60					
70		Dense, moist, gray, gravelly silty sand. Vashon Lodgment Till (Qvt)			
80		Dense, moist to wet with depth, gray, sandy gravel with some cobbles and local boulders. Vashon Advance Outwash (Qva). Silty, till-like zone 87-90, boulders 87-90, 98-100 and 106-111.			
90					
100					
110					
120					Slotted Screen 140-125', Sandpacked 140-122'
130					
140		Dense, moist, gray, gravelly silty sand. Pre-Vashon Lodgment Till (Qpvt)			
150		b.o.h. 146'			
160					

Static water level 132.8
 below ground surface

Drill Hole Log

Bennett Consulting PLLC

Hole No. FR-3

Depth 112

46129 SE 130th Street
 North Bend, WA 98045
 Phone: (425) 785-8390
 Fax: (425) 831-4690

Project Name: Franklin Ridge
 Project Number: GBC06-14
 Drilling Method: Sonic
 Sampling Method: Core

Contractor: Cascade
 Elevation: 760
 Azimuth & Dip: -90
 Hole Diam: 6 inches

Depth	Graphic	Geologic Description	Well Completion		
			Static water level	Screen	Seal
10		Medium dense, moist, brownish gray, sandy gravel, some cobbles and local large boulders. Vashon Recessional Outwash (Qvr). Clay- rich zones 16-18, 28-53, 66-71 and 86-96. Large boulders 20-28 and 76-86	▼ 99.4' below ground		Bentonite Seal
20					
30					
40					
50					
60					
70					
80					
90					
100					
110					Dense, moist, gray, gravelly silty sand. Pre-Vashon Lodgment Till (Qpvt)
120	b.o.h. 112'				
130					
140					
150					
160					

Drill Hole Log

Bennett Consulting PLLC

Hole No. FR-4

Depth 72'

46129 SE 130th Street
 North Bend, WA 98045
 Phone: (425) 785-8390
 Fax: (425) 831-4690

Project Name: Franklin Ridge
 Project Number: GBC06-14
 Drilling Method: Sonic
 Sampling Method: Core

Contractor: Cascade
 Elevation: 760
 Azimuth & Dip: -90
 Hole Diam: 6 inches

Geologic Description		Well Completion	
Depth	Graphic		
10			Bentonite Seal
20	Medium dense, moist to wet with depth, brownish gray, cobbly, sandy gravel with local boulders. Vashon Recessional Outwash (Qvr)		Backfilled with Drill Cuttings
30			
40	Saturated at 42' - Water Table	Static water level 42.17' below ground surface	
50			Slotted Screen 61'-51', Sandpacked 48'
60			
70	Hard, damp, gray, arkosic sandstone and siltstone. Tertiary Renton Formation (Tr) Deeply weathered, rusty brown and wet at top 61-63'		
	b.o.h. 72'		

Drill Hole Log

Bennett Consulting PLLC

Hole No. FR-5

Depth 61'

46129 SE 130th Street
 North Bend, WA 98045
 Phone: (425) 785-8390
 Fax: (425) 831-4690

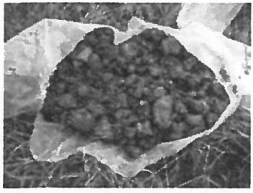
Project Name: Franklin Ridge
 Project Number: GBC06-14
 Drilling Method: Sonic
 Sampling Method: Core

Contractor: Cascade
 Elevation: 750
 Azimuth & Dip: -90
 Hole Diam: 6 inches

Depth	Graphic	Geologic Description	Well Completion		
10		Meduim dense, moist, brownish gray, cobbly, sandy gravel, some silt and local boulders. Vashon Recessional Outwash (Qvr)	No ground water at time of well		Bentonite Seal
20					Backfilled with Drill Cuttings
30					Backfilled with Drill Cuttings
40					Backfilled with Drill Cuttings
50		Many boulders 46-53', difficult drilling, limited recovery	No ground water at time of well		Slotted Screen 53-43' sandpacked to 40'
60					
		Hard, damp, light gray, arkosic sandstone. Tertiayr Renton Formation (Tr)			
		b.o.h. 61'			

Drill Core Photographs

Drill Hole FR-1 Core Photos



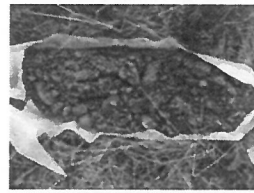
FR-1 10-2'



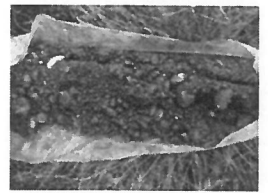
FR-1 2-4'



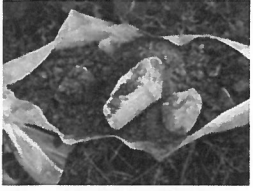
FR-1 4-6'



FR-1 6-8.5'



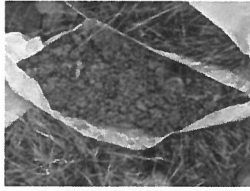
FR-1 8.5-11'



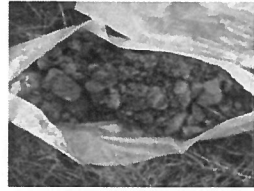
FR-1 11-13.5'



FR-1 13.5-16'



FR-1 16-18.5'



FR-1 18.5-21'



FR-1 21-23.5'



FR-1 23.5-26'



FR-1 26-28.5'



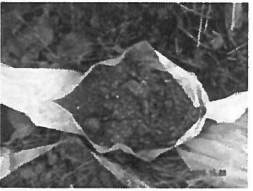
FR-1 28.5-31'



FR-1 31-33.5'



FR-1 33.5-36'



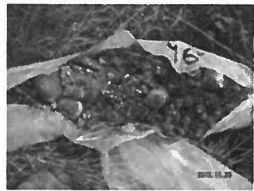
FR-1 36-38.5'



FR-1 38.5-41'



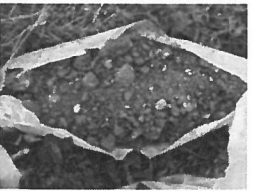
FR-1 41-43.5'



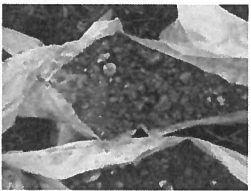
FR-1 43.5-46'



FR-1 46-48.5'



FR-1 48.5-51'



FR-1 51-53.5'



FR-1 53.5-56'



FR-1 56-58.5'



FR-1 58.5-61'



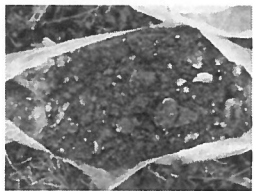
FR-1 61-63.5'



FR-1 63.5-66'



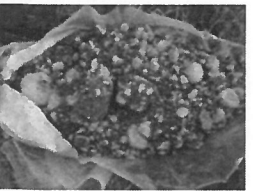
FR-1 66-70'



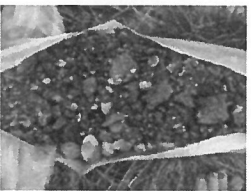
FR-1 70-73'



FR-1 73-76'



FR-1 76-78.5'



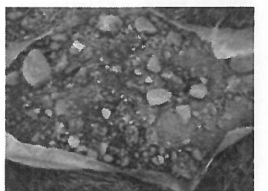
FR-1 78.5-81'



FR-1 81-83.5'

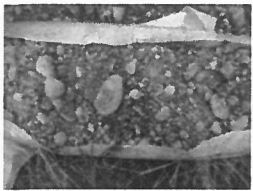


FR-1 83.5-86'

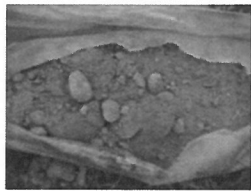


FR-1 86-88.5'

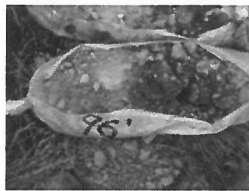
Drill Hole FR-1 Core Photos (continued)



FR-1 88.5-91'



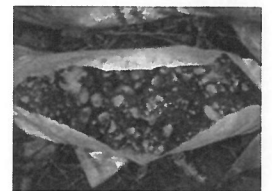
FR-1 91-93.5'



FR-1 93.5-96'



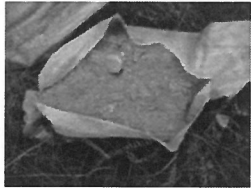
FR-1 96-100'



FR-1 100-103'



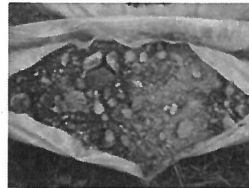
FR-1 103-106'



FR-1 106-108.5



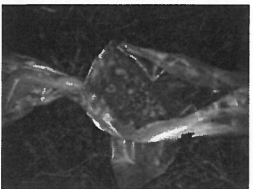
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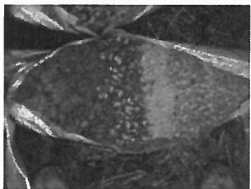
FR-1 111-113.5'



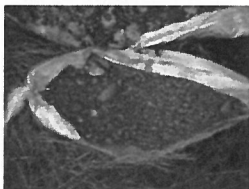
FR-1 113.5-116



FR-1 116-120'



FR-1 120-123



FR-1 123-126



FR-1 126-136



FR-1 136-141

FR-2 Core Photos



FR-2 0-3'



FR-2 3-6'



FR-2 6-8.5'



FR-2 8.5-11'



FR-2 11-13.5'



FR-2 13.5-16'



FR-2 16-19'



FR-2 19-22'



FR-2 22-26'



FR-2 26-29'



FR-2 29-32'



FR-2 32-36'



FR-2 36-41'



FR-2 41-46'



FR-2 46-48.5'



FR-2 48.5-51'



FR-2 51-53.5'



FR-2 53.5-56'



FR-2 56-58.5'



FR-2 58.5-61'



FR-2 61-63.5'



FR-2 63.5-66'



FR-2 66-68.5'



FR-2 68.5-71'



FR-2 71-73.5'



FR-2 73.5-76'



FR-2 76-79'



FR-2 79-82'



FR-2 82-86'



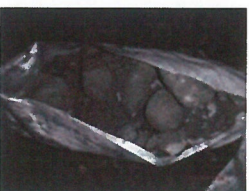
FR-2 86-89'



FR-2 89-92'



FR-2 92-96'



FR-2 96-101'

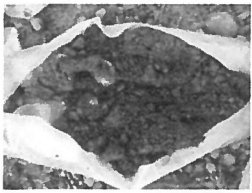


FR-2 101-106'

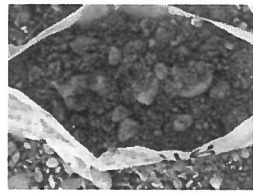


FR-2 106-109'

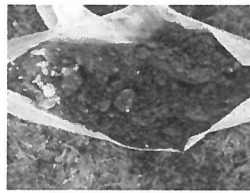
FR-2 Core Photos (continued)



FR-2 109-112'



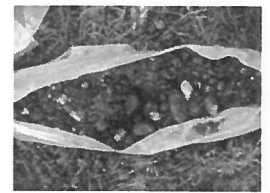
FR-2 112-116'



FR-2 116-118.5'



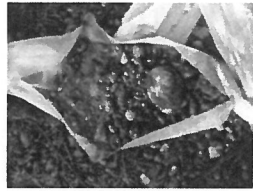
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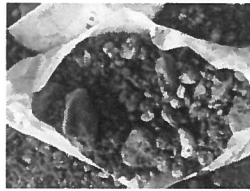
FR-2 121-123.5'



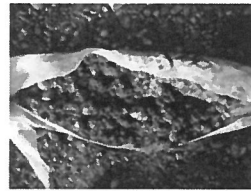
FR-2 123.5-126'



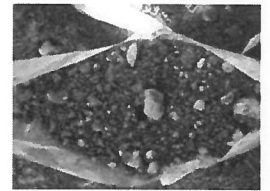
FR-2 126-129'



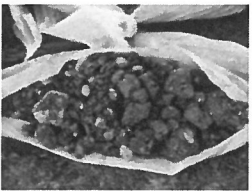
FR-2 129-132'



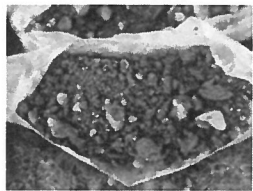
FR-2 132-136'



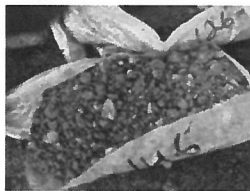
FR-2 136-138.5'



FR-2 138.5-141'



FR-2 141-143.5'



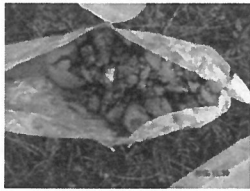
FR-2 143.5-146'



FR-3 91-93.5'



FR-3 93.5-96'



FR-3 96-99'



FR-3 99-102'

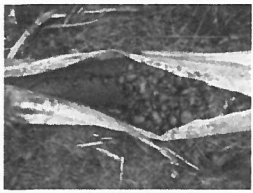


FR-3 102-106'

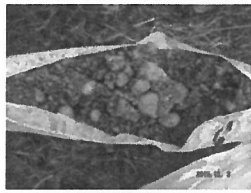


FR-3 106-112'

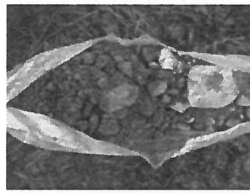
FR-4 Core Photos



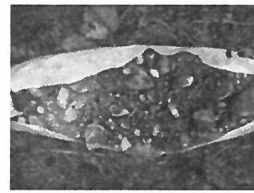
FR-4 0-3'



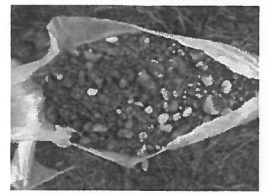
FR-4 3-6'



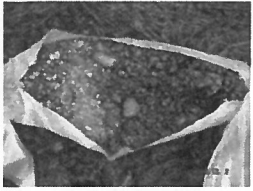
FR-4 6-11'



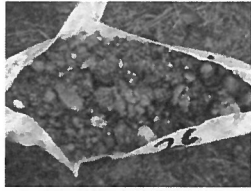
FR-4 11-16'



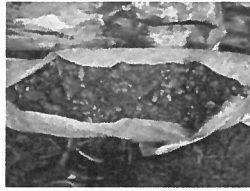
FR-4 16-19'



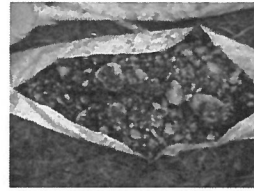
FR-4 19-22'



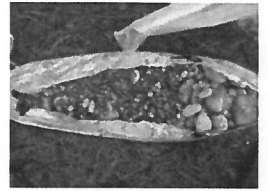
FR-4 22-26'



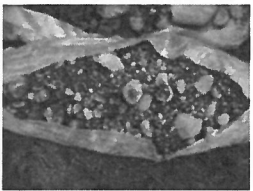
FR-4 26-29'



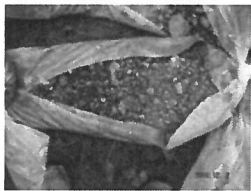
FR-4 29-32'



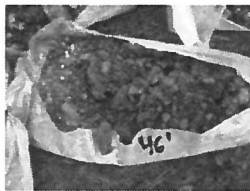
FR-4 32-36'



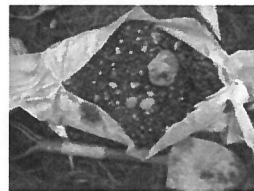
FR-4 36-39'



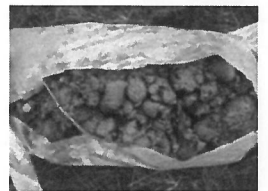
FR-4 39-42'



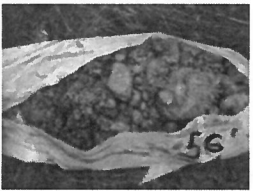
FR-4 42-46'



FR-4 46-49'



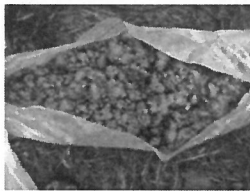
FR-4 49-52'



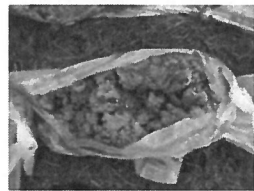
FR-4 52-56'



FR-4 56-58.5'



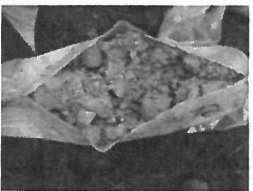
FR-4 58.5-61'



FR-4 61-63.5'



FR-4 63.5-66'



FR-4 66-72'

FR-5 Core Photos



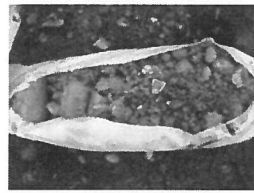
FR-5 0-6'



FR-5 6-9'



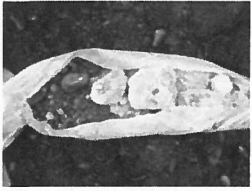
FR-5 9-12'



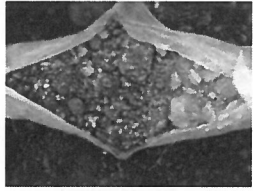
FR-5 12-16'



FR-5 16-21'



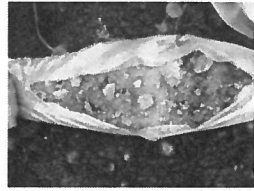
FR-5 21-26'



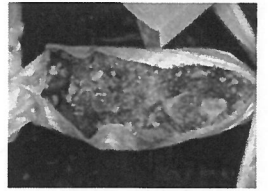
FR-5 26-29'



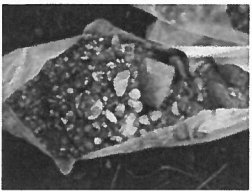
FR-5 29-32'



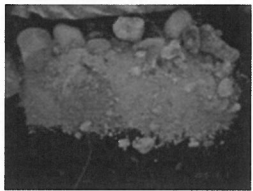
FR-5 32-36'



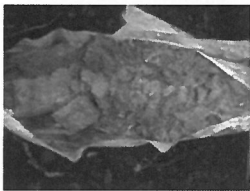
FR-5 36-41'



FR-5 41-46'



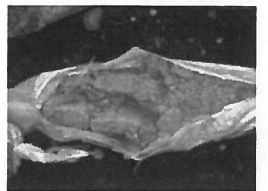
FR-5 46-55'



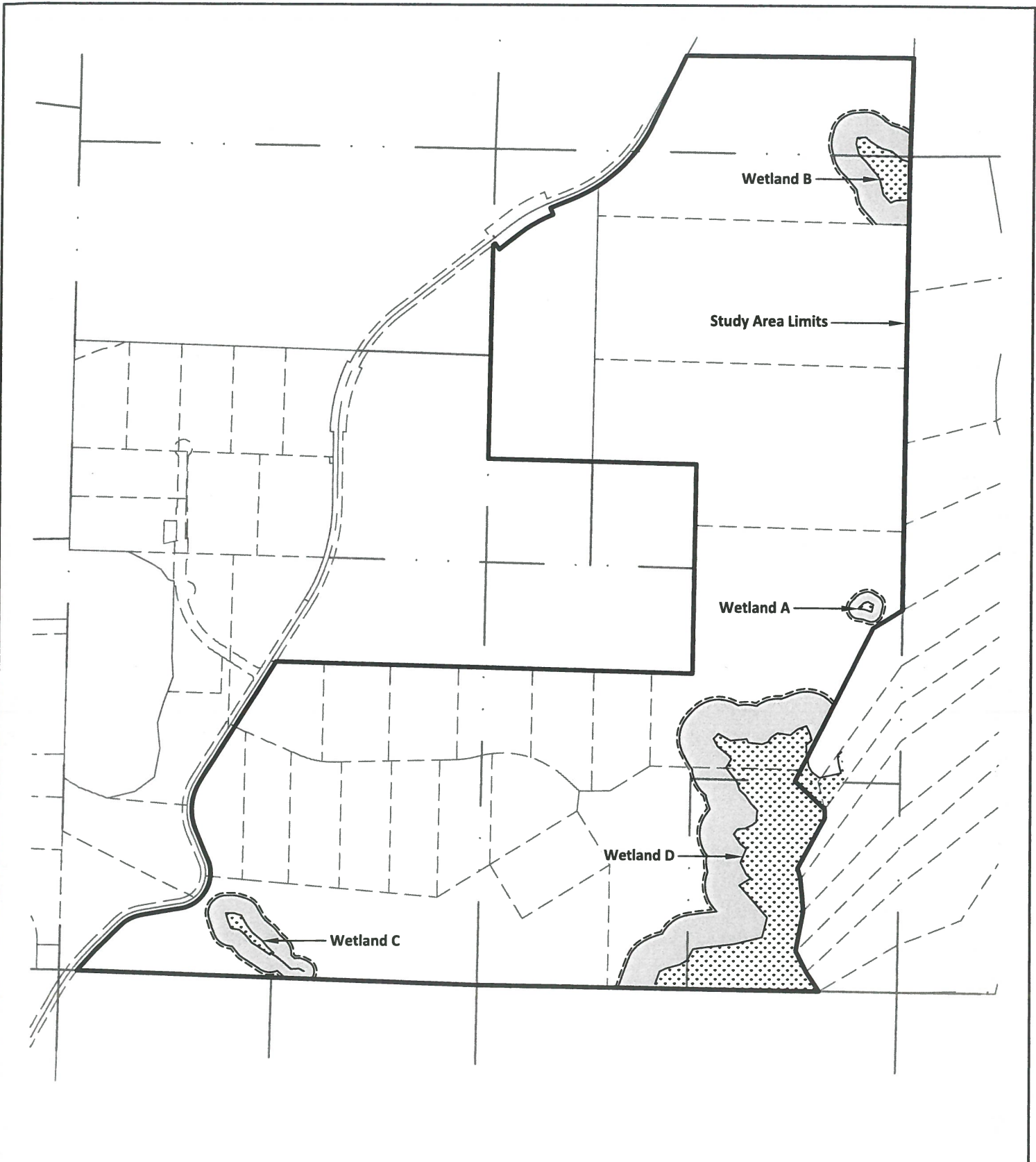
FR-5 55-57'



FR-5 57-59'



FR-5 59-61'



The base survey used to prepare this exhibit was provided by Traid Land Development Consultants. Source drawings were modified for visual enhancement.



SCALE: 1" = 800'

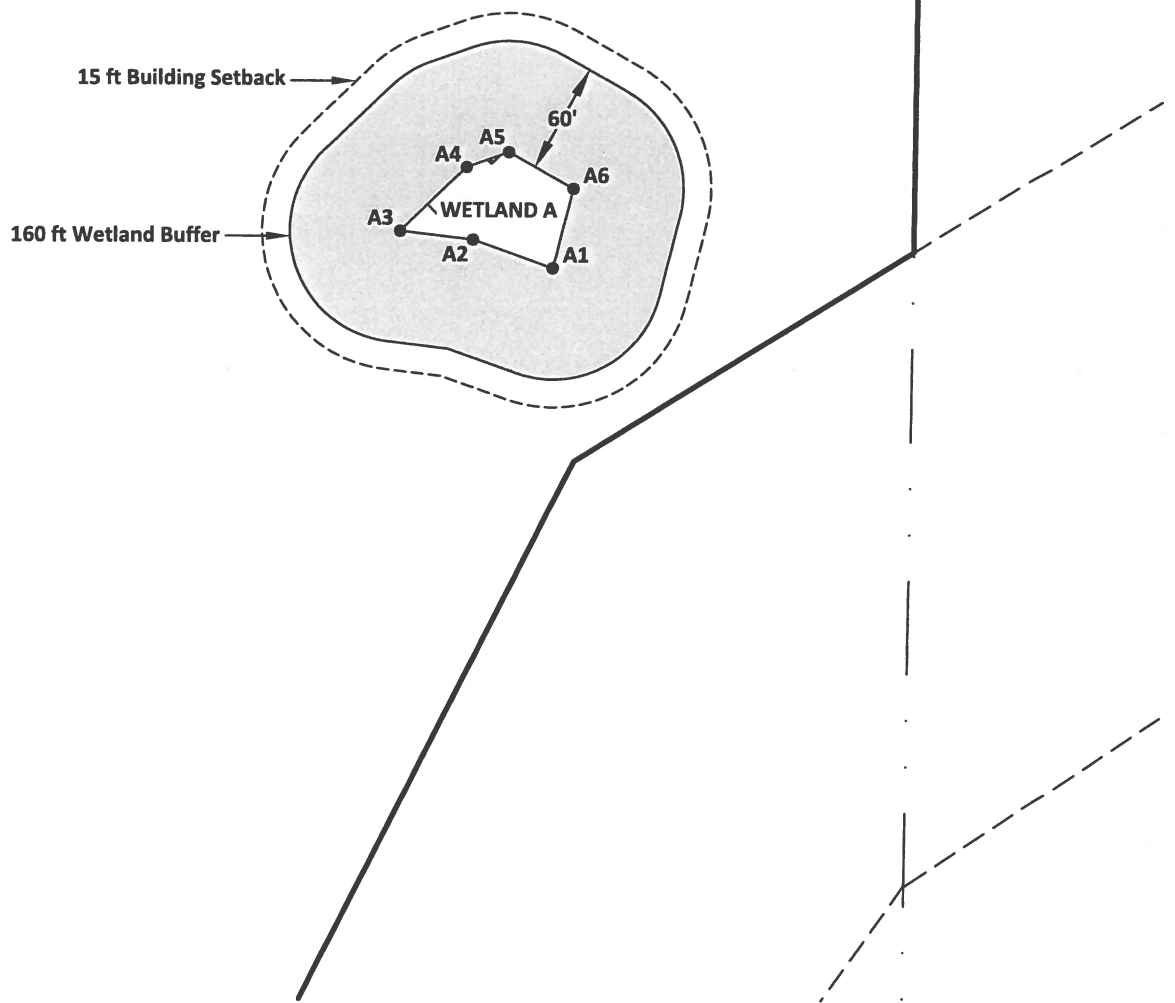
Wetland Exhibits - Coversheet

Palmer Section 30



Sewall Wetland Consulting, Inc.

PO Box 880
 Fall City, Washington 98024
 (253) 859-0515 - telephone



The base survey used to prepare this exhibit was provided by Traid Land Development Consultants. Source drawings were modified for visual enhancement.



SCALE: 1" = 100'

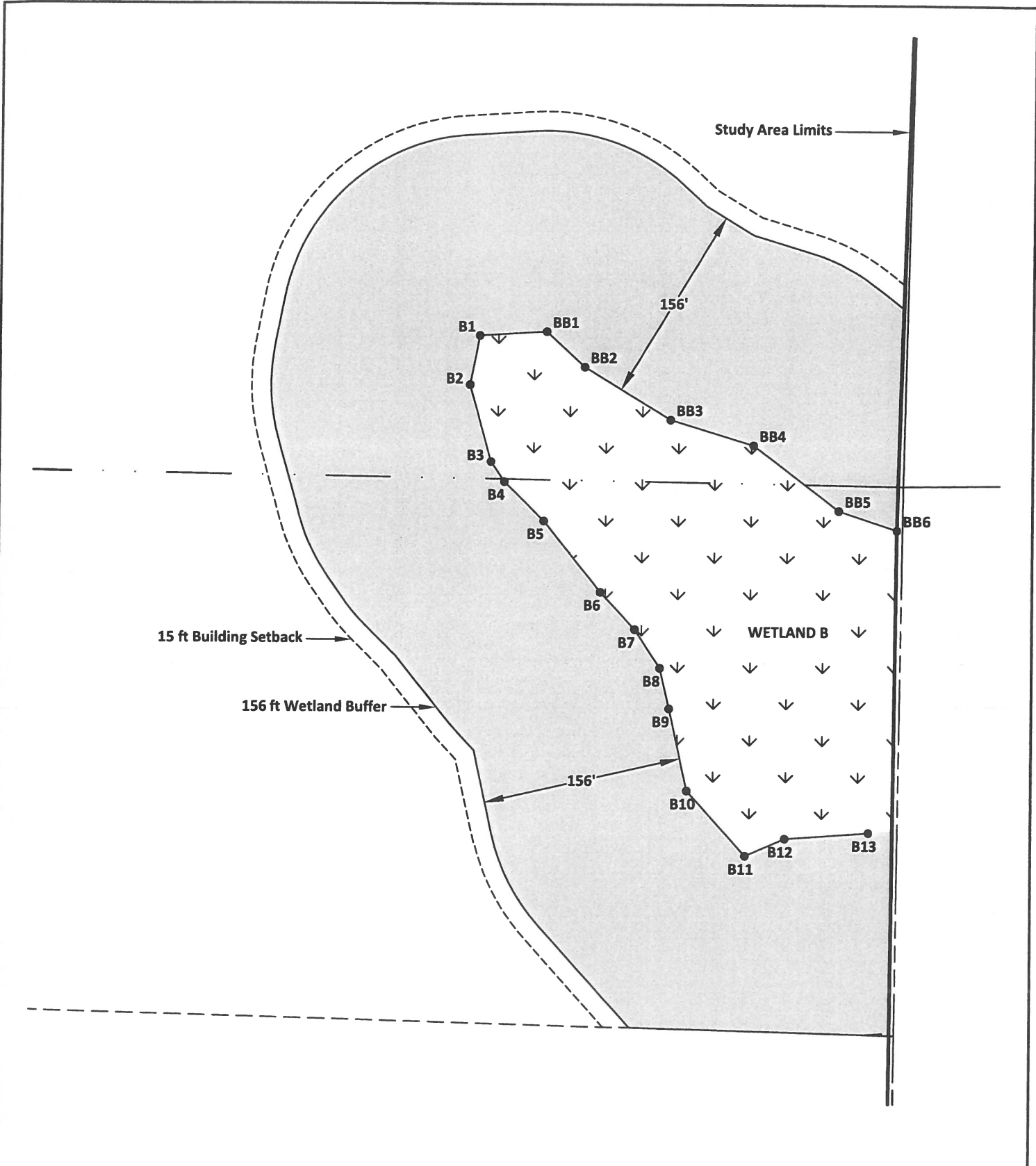
Wetland Exhibits - Wetland A

Palmer Section 30



Sewall Wetland Consulting, Inc.

PO Box 880
 Fall City, Washington 98024
 (253) 859-0515 - telephone



The base survey used to prepare this exhibit was provided by Traid Land Development Consultants. Source drawings were modified for visual enhancement.



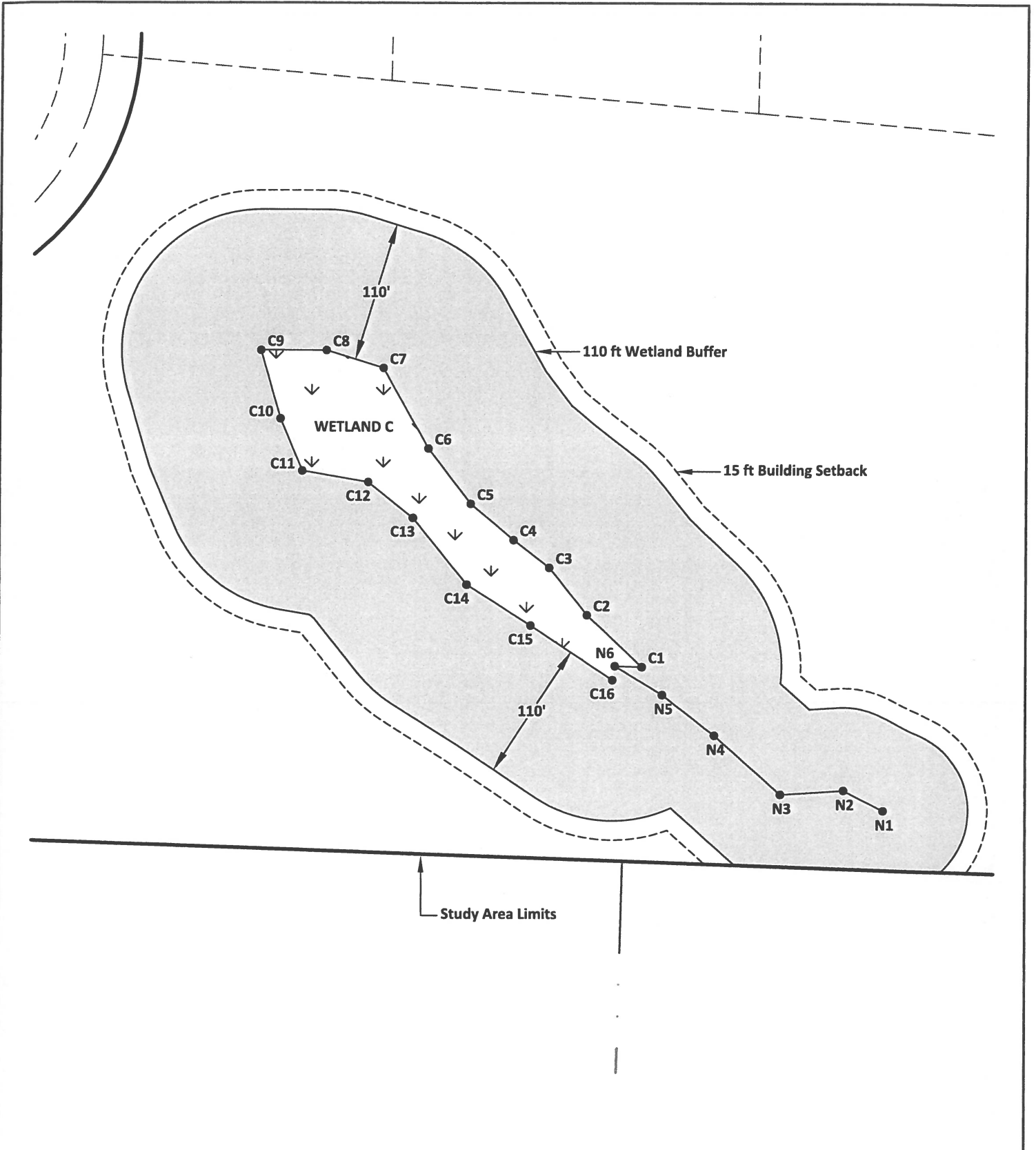
SCALE: 1" = 100'

Wetland Exhibits - Wetland B
Palmer Section 30



Sewall Wetland Consulting, Inc.

PO Box 880
Fall City, Washington 98024
(253) 859-0515 - telephone

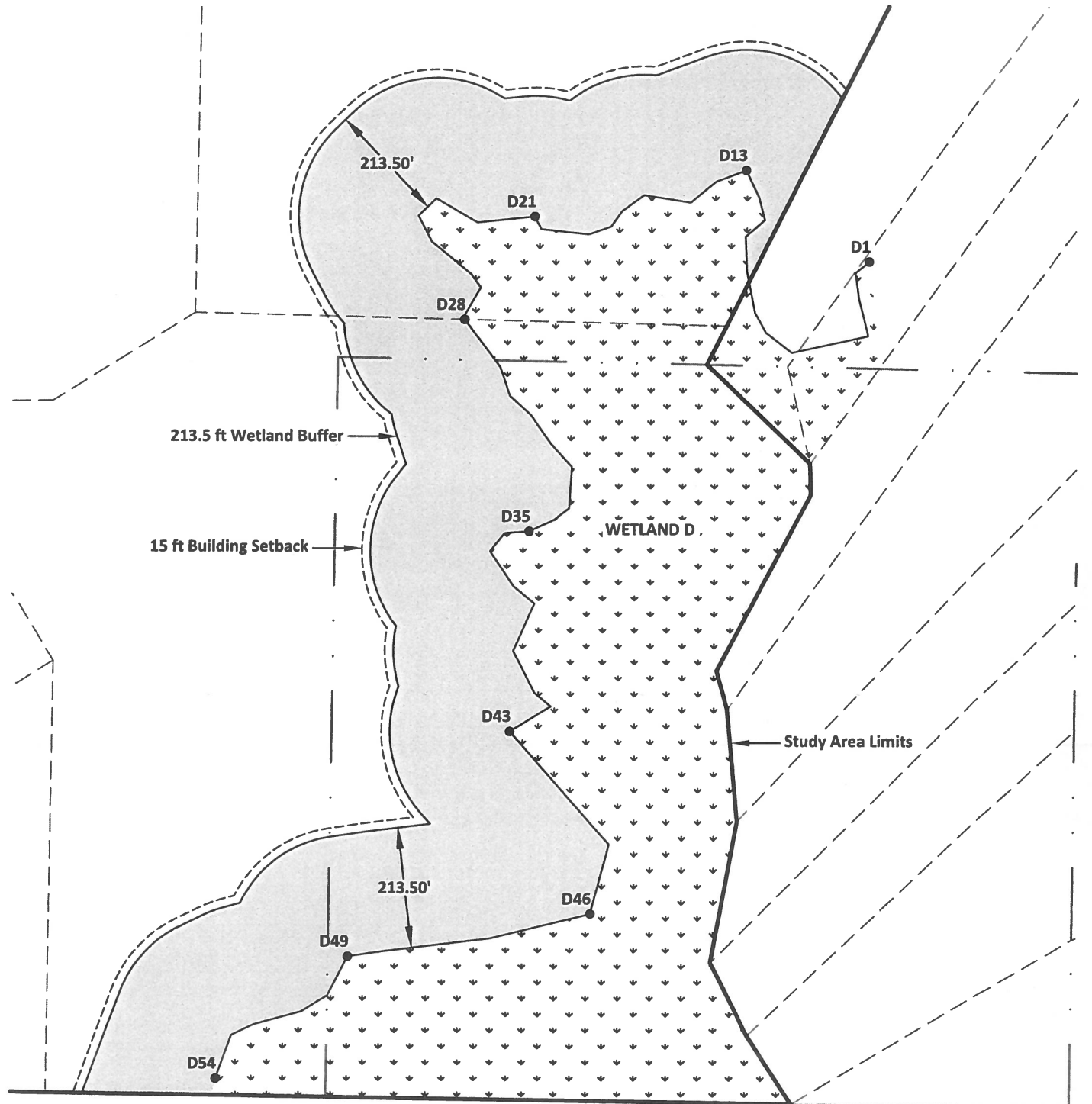


The base survey used to prepare this exhibit was provided by Traid Land Development Consultants. Source drawings were modified for visual enhancement.

SCALE: 1" = 100'

Wetland Exhibits - Wetland C
 Palmer Section 30

Sewall Wetland Consulting, Inc.
 PO Box 880
 Fall City, Washington 98024
 (253) 859-0515 - telephone



The base survey used to prepare this exhibit was provided by Traid Land Development Consultants. Source drawings were modified for visual enhancement.



SCALE: 1" = 200'

Wetland Exhibits - Wetland D

Palmer Section 30



Sewall Wetland Consulting, Inc.

PO Box 880
 Fall City, Washington 98024
 (253) 859-0515 - telephone



King County
Department of Permitting
and Environmental Review
35030 SE Douglas St., Ste. 210
Snoqualmie, WA 98065-9266
206-296-6600 TTY Relay: 711
www.kingcounty.gov

January 23, 2017

PREA16-0261- To rezone approximately 225 acres from RA-5 to Mineral classification

From: Fereshteh Dehkordi, Project Manager
fereshteh.dehkordi@kingcounty.gov
(206) 477-0375

Rezone Permit Submittal:

- Project Narrative/Rezone Application - please revise and include activities associated with the parcels included in the rezone application only.
- Provide information on estimated gravel and sand to mined, estimated duration, what type of activities (mining, processing, crushing, sorting, loading), phasing, estimated traffic generated for each phase, and proposed access. Provide the same in the ECL.
- Community Meeting- King County Code 21A.22. 035 requires a community meeting to be scheduled for any proposed mining activities. Notice of community meeting may be combined with the department's Notice of Application (NOA). Please provide the time, date and location of the community meeting at the time of the rezone application.
- Please revise the ECL to correct project narrative and other marked areas (see redline). DPER recommends that an expanded ECL be prepared to address impacts to all elements of environments as listed under KCCP R-689. The supplemental reports will allow comprehensive review of all potential impacts from the proposed reclassification request. Please include the Greenhouse Gas Emission Worksheet.
- The Rezone may require preparation of an Environmental Impact Statement (EIS).
- Please identify the source of water for dust and fire management.
- Identify any domestic residential wells within 200 feet from the rezone site property boundary.
- Show any structures needed for proposed mining activities such as office, storage, shop etc. Please identify the number of people working at the site.
- Provide a conceptual mining plan in compliance with the setback requirements of KCC21A.22.070, Critical Areas setback, proposed structures, driveway and gate.

Boundary Line Adjustment:

The boundary of the rezone area must be clearly identified and include all parcels for the reclassification request. DPER recommends that a Boundary Line Adjustment application be

submitted, approved and recorded prior to the submittal of the rezone application. Small lots may be merged as part of this BLA to comply with the provision of KCC21A.22.060.

Historic/Archeological review Comments:

The northern portion of the project area is in the Green River Gorge Historic/Archaeological District (45DT51). All planned work within the District's boundaries will need to be reviewed by DAHP for a determination as to whether an archaeological excavation permit is necessary.

There are no known archaeological sites in the remainder of the project area, but two Indian trails depicted on the 1881 GLO map cross the southwestern corner of it. No archaeological surveys been conducted in the project area. The relatively flat areas in the project area have a moderate probability of containing archaeological resources. Ideally, the applicant would have an archaeologist conduct a subsurface archaeological survey in those areas. The applicant should have an inadvertent discovery plan in place for all work and should contact interested Indian Tribes well in advance of any work in the project area.

For any questions, please contact Phil LeTourneau at: 206 477-4529.

BLAD18-0014

Recording No. 20200311900001

