

Steve Higgins' November 21, 2003 Letter to Snohomish County Planner Susan Scanlan Re Cadman Longview Fibre Proposal, Proj. #02-100530

(The below letter also included six very demonstrative photos of damage to Procter Creek watershed area; see our webpage to view.)

FROM: Steve Higgins [*G.R.I.T. NOTE: Mr. Higgins is a building contractor, a long-time Sky Valley resident, writes a column for the Monroe Monitor, and is currently a Gold Bar councilman.*]

TO: Susan Scanlan, Principal Planner for Snohomish County

REGARDING: County project number 02-100530 (Cadman mining proposal on land leased from Longview Fibre). This is intended for inclusion in the referenced county land use file.

Dear Susan:

I own two properties in the Big Bend community of 220 residential properties located near the site where the Cadman company is proposing to excavate a 250-acre open pit mine. (My properties are lots 9 and 73 of the plat of Greenwater meadows).

I purchased these investment properties reasonably assuming the county regulations would adequately protect them from the impacts of proposed activities of a land use applicant.

I have consulted with numerous experts, spent hundreds of hours researching the watershed management of this basin, and have found that your review process is insufficient because it does not address the potential threat to my properties from flood damage.

It is important for you to be aware that the property owner, Longview Fibre, has removed a considerable amount of forest cover within the Procter Creek watershed. Unfortunately, the Department of Natural Resources (DNR) does not know how much of the watershed forest canopy has been removed, because they are not keeping track of it. DNR is simply looking at each logging project individually, while ignoring the cumulative impacts.

Widely accepted current science indicates that excessive forest canopy removal in the watershed will raise water levels during flooding events from rain, and, most worrisome, from and rain-on-snow flooding events. Procter creek, which drains the entire watershed, empties directly into a FEMA-designated flood hazard area in the immediate vicinity of both of my properties, as indicated on maps in the county's planning department. I have seen no mention of this in your SEPA process thus far.

It is shocking, to say the least, that the county would ignore such critical information. The reason you should have included assessment of impacts to the flood hazard area is that the Cadman DEIS clearly states the overflow, or failure of the surface water

retention system for the mine, will flow "through a series of inadequate ditches and culverts" over others' properties along the sole access road to Big Bend, and directly into the flood hazard area in which about one hundred homes are located.

Is it legal to redirect surface water flow over others' properties, without their permission?

Then there is the question of why the county would even consider allowing the Cadman Plan to include an infiltration gallery [in order] to discharge large amounts of untreated surface water, wheel wash, and processing water within very close proximity to our community wellhead?. This is especially troublesome considering the shallowness of the well, the downslope proximity, and highly-permeable soil conditions.

Then your staff explained that the county has no regulations protecting Critical Aquifer Recharge Areas in support of federal clean water laws. Current science is clear that a watershed analysis is the only way to adequately assess the cumulative impacts of both the mining and timber harvesting activities on the Longview property, yet this analysis is absent for the purpose of reviewing Longview's ongoing logging operations because the Washington State Department of Natural Resources doesn't require it. In combination with the proposed mining, the potential cumulative impacts of the tree-cutting and mining is completely omitted in your SEPA review

According to county documents, this is one of the worst flood hazard areas in Snohomish County

The Washington State Department of Natural Resources has not required a watershed analysis to assess the impact of the Longview tree cutting, and, therefore, it is not possible for the county to assess the impact of the property owners' combined activities without further study.

I am requesting a comprehensive watershed analysis be completed before any recommendation regarding this proposal is forwarded.

The insufficiency of the DNR review does not reduce the County's obligation to protect my property.

Sincerely

Steve Higgins (425) 444-2801 stevehig@msn.com

PS please see attached picture of stream which was recently destroyed by the Longview Fibre company, on the subject property. This land was referred to as a "buffer" by the applicant for the mining proposal. These types of sub-alpine streams are extremely important the natural regulation and retention of storm water, and mitigation of flooding..

In the other attached pictures, please note failure of Longview to leave even minimal buffers in stream corridors. This not only increases flooding, but destroys fish habitat.

Also, please notice the nearly one-mile long debris flow -- starting at an area high on Mt. Persis -- on Longview land that should not have been logged because it was too steep. The debris flow results in faster recharge, and greater peak flows during flood events downstream. The annual rainfall on Mt. Persis, according to county documents, is 100-110 inches per year, and subject to dramatic rain-on-snow events, making flooding concerns very critical.

All of these pictures were taken within the Proctor Creek Drainage basin. The owner of the land on which the proposed mine is located has done a terrible job managing the land, and is poised to cause even greater harm to the watershed, and potentially to nearby residential properties.