From:	Early, Shane (DNR)
То:	Rachael Stevie (CD)
Cc:	MAUNEY, MARTY (DNR); YOUNG, BRENDA (DNR); SMITH, LIZ (DNR); Warthen, Luke (DNR)
Subject:	RE: SE-22-00057 Downs - Notice of Application
Date:	Thursday, June 30, 2022 9:22:40 AM
Attachments:	image001.png
	image002.png

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Good morning Rachel,

I was curious about this project but noted the hyperlink takes one to Misc SEPA SE-22-00015 (Thorp Landing), but found the Downes file fairly easily at the following: <u>https://www.co.kittitas.wa.us/cds/land-use/project-details.aspx?</u> <u>title=Miscellaneous%20SEPA%20Applications&project=SE-22-00057+Downs</u>

However my main question is why the Downs project is undergoing SEPA – looking at the related checklist, there is mention of needing a DNR Forest Practices Application (FPA, aka a "logging permit"), but I repeatedly see mention of just cutting 40% of existing timber (targeting Douglas fir) ostensibly for the purpose of general forest health and timber management. Timber harvest as described would only require a Class III FPA, which does not need to undergo the SEPA process. If the project proponent is planning to convert a portion of the forested property to non-forestry, then that information is lacking on the checklist, and I would further note that the response to Background question #7 (*Do you have plans for future additions, expansions, or <u>further activity</u> <i>related to or connected with this proposal*? *If yes, explain*) is "No, commercial thinning of timber".

If the project proponents are wanting to build houses (number unknown, location unknown) in the relative near future, then they really need to make this clear on the SEPA checklist. My understanding is also that they would need to indicate basic information related to building houses, such as the approximate location, how drinking water would be obtained (wells?), what the soils are like for septic systems, how emergency services would have access, how wildfire protection/prevention measures would be undertaken, and many similar details that would be standard for any project that involves the development of houses. If at some point in the future the DNR were to receive a Class IV-General FPA from the project proponents (for partial or complete conversion of the property from forest to non-forest) and receive some form of SEPA decision from Kittitas County (i.e. a DNS or MDNS) relating to the information you received for analysis, we would likely not be able to use the SEPA, as it does not describe in any way, shape or form the intent to do anything except very standard timber harvest/commercial thinning.

Happy to discuss any questions, comments or concerns that you or others in Kittitas County Community Development may have. Best regards,

Shane Early

Forest Practices Coordinator Southeast Region Washington State Department of Natural Resources (DNR) ☎ (509) 925-0948 ⊠ <u>shane.early@dnr.wa.gov</u> <u>www.dnr.wa.gov</u>

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Sent: Thursday, June 30, 2022 8:09 AM

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