

August 6, 2018

Cari Hornbein, Senior Planner
City of Olympia Community Planning & Development Department
Olympia, WA

Ms. Hornbein,

I appreciate having received notice of the upcoming public hearing for Project # 17-4199, Briggs Village West Residential, Phase I Preliminary Plat and having received the Department's responses to the SEPA DNS. I would like to comment on the responses, as below.

B. ENVIRONMENTAL IMPACTS

1. Earth

d. Although there may not be a history of soil instability, this area was historically undisturbed. The western slope of the south kettle is very steep and has soft soil.

e. It's hard to imagine homes being built right near the entrance of the development off of Yelm Hwy. The natural elevation at that spot must be at least five feet. How is that much earth going to be removed without virtually eliminating the forest between it and the bank of the south kettle?

f. Erosion during construction is a probability. Even after construction, our heavy rain patterns will produce erosion, either as sheet runoff or gully formation. It takes only one area of funneled stormwater runoff to create a significant gully on this hillside. Have you assessed for existing gullies?

g. Reducing the amount of porous surface would be a problem for this location, in particular. I see no plans for rain gardens, permeable pavement, or other measures to reduce stormwater run off. This does not seem forward-thinking.

3. Water

a. Surface water

1. & 2. I believe the significance of the south kettle wetland is being downplayed. The wetland and surrounding woods support a wide variety of animals and plants. (See 5. Animals)

d. Water runoff (including stormwater)

How, specifically, would the water be "treated and infiltrated? Would the method be upgraded from that currently used by the vault on the east side of the kettle? How would hydrocarbons and other pollutants be eliminated? What are the elements of the "Stormwater Pollution Prevention Plan," and will they pertain after construction is completed?

The south kettle has been described as "contaminated" by chemicals associated with the previous plant nursery and therefore a reasonable place to direct stormwater runoff. Three

points on that. a. From reading the Agreed Order pertaining to cleanup, my understanding is that the bulk of the nursery chemical runoff went into the central kettle. I don't advocate stormwater runoff going into any of the kettles, but I suspect the south kettle is not as contaminated as described. b. Every year the water in the kettle manages to support breeding amphibians a lots of other creatures, and it would be best to keep it that way. c. The glacial silt at the bottom of the kettle probably doesn't allow for natural filtration of toxins related to stormwater runoff. They will persist and concentrate, harming the creatures that need the water.

e. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts.

I fear that silt fencing and covering exposed soils may not suffice, particularly at the steep west side of the kettle.

One thing not mentioned is the disposal habits of the construction workers. I have been witness to the construction of the townhouses along Briggs Drive SE last summer and this summer. The construction workers routinely leave behind them pieces of plastic, styrofoam, wire, insulation, plastic bottles, plastic wrappers, etc. In neither case have I seen a disposal bin, and in both cases, I have cleaned up after them. This is particularly a problem near the steep slope to the kettle wetland.

4. Plants

b. Which of these trees, shrubs, and grasses, specifically, would be removed? I think this should be spelled out. This small ecosystem not only supports a wide variety of wildlife, it also provides a cool air zone in an urban heat island. It provides an important carbon sink. How would the loss of these benefits be mitigated? I see almost no green space on the map that isn't manicured.

The kettles are part of a unique wetland chain. (Right now we are talking only about the south kettle. But future plans would extend the housing development to the edge of the central kettle.) They are not just any piece of wooded property. They hold intrinsic value that exceeds their tax worth in a growing city.

e. I don't see a discussion (or even a question on the survey, for that matter) about the plan for removal of the invasive plant species and replacement with native species. The plan should explain how the replacement plants will be cared for during their establishment and maintenance.

5. Animals

a. Animals (resident and migratory) that I have seen and heard include but are not limited to:

Deer

Fox

Coyote

Raccoon

Burrowing animals

Several species of native bees

Various other insects
Chorus frogs (breeding)
possibly other amphibians
Great Horned Owl (nesting)
Red Tailed Hawk (nesting)
Kestrel
Northern Flicker
American Robin
Black-Capped Chickadee
Bushtit
Stellar's Jay
Western Scrub Jay
American Crow
Rufous Hummingbird
Anna's Hummingbird
Barn Swallow
Cliff Swallow
Spotted Towhee
Pacific Wren
Bewick's Wren
Song Sparrow
White-Crowned Sparrow
Red-Winged Blackbird
American Goldfinch
House Finch
Dark-Eyed Junco
Kingfisher
Black-Headed Grosbeak
Cedar Wax Wing
Wilson's Warbler
Hermit Thrush
Wood Thrush
Willow Fly Catcher
Killdeer
Water Fowl (various species)
Mourning Dove

The features surrounding the kettle, including dark, mature forest (which appear to have some old-growth fir), deciduous trees, various bushes, open grassland are of a variety and nature that even this relatively small space supports a lot of wildlife, both resident and migratory. Nature needs a multilayer canopy.

b. There are several migratory birds that utilize the kettles.

d. The proposed amount of reserved land "near and within the wetland" is insufficient to preserve and protect wildlife. **It completely eliminates the layers of habitat needed for resting, protection, nesting, and feeding.**

Another important function of the kettles and surrounding woods is as a wildlife corridor. Animals use this corridor to pass from south to north. The proposed development would all but eliminate the corridor, especially if residents have dogs (which frighten wildlife) and cats (which prey on them).

e. The only invasive animal species I have seen are house sparrows, starlings, and domestic cats.

6. Energy and Natural Resources

c. Why is it anticipated that energy needs will meet or exceed Washington State Energy Code?

8. Land and Shoreline Use

a. Are there vacant properties to the west? It appears that their are homeowners.

e. It is interesting that this extension of residential property past the Kettle View Park and through the woods to the other side of the kettle is zoned as Urban Village. I can understand that designation as it pertains to main Briggs Village and and the area radiating from the "Town Square," but this reach to the west side of the kettle seems like something different.

h. If the wetland and steep slopes are classified as a critical area by the city or county, why would they be developed? Why does this extension of the Briggs Village have to occur, at all?

10. Aesthetics

b. I would have to beg to differ that the views from existing homes would not be significantly impacted. The loss of the woods and the sounds of wildlife (especially in the spring and early summer) would be very sad.

11. Light and Glare

a. Lights with blue frequencies will disturb human sleep and likely interrupt behaviors of migrating birds, breeding amphibians, and other wildlife.

d. I would say it is not completely accurate to state that the project is not expected to cause impacts.

14. Transportation.

There is a real potential traffic problem associated with this development. It can be anticipated that drivers heading east on Yelm Highway with plans to go north on Henderson Blvd will cut through the development rather than wait for the light at the busy intersection of Yelm and Henderson. They will enter the development and exit on Eagle Bend Drive, taking Briggs Drive SE to Henderson Blvd. We already see drivers doing that on Briggs Drive SE, and they sometimes don't follow the speed limit. Imagine the traffic levels if the full Briggs Village unfolds.

At this time, families enjoy the safety and tranquility of Kettle View Park. Kids ride their bikes and scooters without concern up and down Eagle Bend Drive SE. Having Kettle View Park as link between the main Briggs Village (with its concentrated residential and commercial enterprises) and Yelm Highway is courting tragedy.

b. There is a bus stop in Henderson, north of Yelm Hwy. It would be a bit of a hike for residents of Briggs West, however.

15. Public Services

a How, where, and by whom would the increased public services mentioned be provided?

I'm generally in favor of concentrated housing for that "urban village" concept, as a way to preserve important habitat and green space. The central Briggs Village sort of does that, although it lacks sufficient rain permeable surfaces and green space.

Briggs Village West Residential (project #17-4199) does not fit in with the urban village concept, and it does not concentrate housing in a way that preserves important green space. Quite the opposite. I'm sorry to say it, but this project largely appears to be an opportunity for additional tax revenue for the city. If the city needs housing tax revenue, surely there are areas with less environmental sensitivity available.

This development plan is simply too destructive. Too many homes are clustered too tightly and too close to the edge of the south kettle. The concentration of homes would cut off a wildlife corridor and leave too little understory for all creatures. The stormwater runoff would erode the hillside, endangering people, and diversion of runoff to the kettle would endanger the creatures who depend on it. The kettle isn't just some old stormwater pond. It really isn't.

The connection of Yelm Hwy to the central Briggs Village via Eagle Bend Drive is too dangerous. Drivers in a hurry make mistakes. Many young families live here. Why put them at risk?

Several months ago I witnessed an unusual phenomenon over the South Kettle and Eagle Bend Drive. Circling above were 5 or 6 adult bald eagles. After a period of time, one eagle peeled away and glided off to the east. Shortly thereafter, a solitary eagle arrived from the west and joined the circle. After a period of circling, another eagle peeled off to the east. That eagle was replaced by another eagle flying in from the west. I could see far off in the distance eagles flying toward the spot, one-by-one. Each replaced one that was leaving the circle. As time went on, I saw that the last ones to arrive were juvenile. They circled slowly. One-by-one they left the circle until none remained. I wondered, "How did Eagle Bend Drive get its name? So often, housing developments are named for the unique natural phenomena they replaced. Could that be the case here?"

The kettles and surrounding woods are a very special system. They support a wide variety of resident and migratory life in a relatively small area. They help to cool the local environment. They trap carbon. They provide a buffer allowing safe spaces for young families. They have intrinsic value. Please consider preserving them as a legacy for the City.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

August 14, 2018

Cari Hornbein, Senior Planner
City of Olympia
Community Planning and Development
PO Box 1967
Olympia, WA 98507-1967

Dear Ms. Hornbein:

Thank you for the opportunity to comment on the revised determination of nonsignificance for the Briggs Village West Residential, Phase I Preliminary Plat Project (17-4199) located at the 1200 Block of Eagle Bend Drive as proposed by SCJ Alliance for Briggs RE Development, LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287

All grading and filling of land must utilize only clean fill, i.e., dirt or gravel. All other materials, including waste concrete and asphalt, are considered to be solid waste and permit approval may be required from your local jurisdictional health department prior to filling (WAC 173-350-990).

All removed debris and dredged material resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials.

TOXICS CLEANUP: Mohsen Kourehdar (360) 407-6256

If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office (SWRO) at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Mohsen Kourehdar with the SWRO, Toxics Cleanup Program at (360) 407-6256.

WATER QUALITY: Chris Montague-Breakwell (360) 407-6364

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
 - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
 - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/> - [Application](#). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Cari Hornbein, Senior Planner

August 14, 2018

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If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(MLD:201804170)

cc: Derek Rockett, SWM
Mohsen Kourehdar, TCP
Chris Montague-Breakwell, WQ
Briggs RE Development, LLC (Proponent)