

**MEMORANDUM**

TO: Mark Scheibmeir, Olympia Hearing Examiner

FROM: Cari Hornbein, Senior Planner

DATE: June 29, 2020

SUBJECT: Water Street Emergency Generator Replacement, File No. 19-1127 - Amended Permit Conditions

On June 5, 2020, the City issued a SEPA Determination of Nonsignificance (DNS) for the above-referenced project. Written comments were submitted by the Department of Ecology on June 19 with recommendations for the treatment of soil and groundwater contamination if encountered during construction. Their letter was e-mailed to you on June 24, 2020 as Exhibit 17. I consulted with Jim Rioux, Project Manager and Nicole Floyd, SEPA Official in the preparation of this memorandum.

Recommended items 1 – 3 in Ecology’s letter are addressed in an Environmental Media Management Plan prepared by the City’s consultant, Landau Associates. This document is referenced in the environmental checklist and included in the packet as Attachment 13. Because this report was submitted after the Site Plan Review Committee took action, staff recommends that the following be added as a condition of permit approval:

- The project shall follow the recommendations outlined in the Environmental Media Management Plan, dated April 1, 2020.

Recommended items 4 and 5 are typically required when contamination has been confirmed. Not knowing if contamination will be encountered during construction, staff does not object to Ecology’s request. The SEPA Official is of the opinion that these items can be handled as permit conditions instead of SEPA mitigation. As such, staff recommends that the following be added as conditions of permit approval:

- Upon completion of the project, submit a final report to Ecology’s Toxic Cleanup Program documenting all environmental activities completed. The report shall follow reporting requirements outlined in WAC 173-340-515. Provide all appropriate bills of lading for disposed materials in the final report.
- Upload environmental data that has been collected to Ecology’s Electronic Information Management (EIM) database pursuant to Ecology Toxic Cleanup Program Policy 840.

Staff suggests that these conditions be inserted before Condition #5 in the staff report, and that subsequent conditions be renumbered accordingly.