

From: [Carp, Lizzie \(ECY\)](#)
To: [Nicole Floyd](#)
Subject: RE: West Bay Yards
Date: Wednesday, October 1, 2025 1:51:54 PM
Attachments: [image001.jpg](#)
[image002.png](#)

Hi Nicole,

We would like to rescind the comments I sent yesterday. Ecology is not requesting more information or revisions. After talking with our engineering team, it became clear that some of the comments were based on incorrect or incomplete information. They also drafted these comments without considering SMP compliance. Based on the submittal, it appears that Alternative 3 is still the most compliant with the SMP. I'll explain why yesterday's comments are not applicable.

Erosion/stability: The team said there was active erosion because they identified an eroding scarp south of West Bay park. However, they did not identify the age of the scarp or calculate an erosion rate, and it sounds like they used an incorrect reference point when comparing historical aerial images. As I said in my previous email, this appears to be a medium wave energy site if MSDG guidelines are used. Additionally, yesterday's comments did not evaluate whether Alternative 3 would achieve the intended result of the restoration project (SMP 18.20.855.I) or quantitatively compare the erosion and flood risk of Alternative 3 to Alternative 2. Our engineers stated that a thicker gravel berm would provide longer-term stability, but did not state that the narrower berm proposed would be undermined in a specific timeframe. If the applicant's consultants concluded that Alternative 3 would provide adequate stability and achieve the intended restoration result, Ecology does not have evidence at this time to dispute their findings.

SLR, Groundwater, and Flooding: We do not have reason to believe that the proposal is inconsistent with the SMP based on the observations made in these sections. These comments can be considered advisory and outside the scope of the shoreline permitting process.

Questions: after talking with the engineering team, it sounds like these questions and comments were more intended to highlight that Alternative 2's wider berm would provide additional stability, not that Alternative 3's design was unacceptable or inconsistent with SMP regulations. Ecology is not requesting an answer from the applicant to the question in this section.

Please see my 9/4 email regarding the adequacy of the applicant's responses in the matrix. Regarding the feasibility of using a cofferdam: it appears that there is still uncertainty about the thickness and occurrence, and therefore the shear strength and bearing capacity, of subsurface sediments. It therefore appears uncertain that using a Portadam would be infeasible. The applicant cites obstructions to sheet pile placement, but there did not appear to be any such obstructions in the shoreline field exploration locations TP-3, CPT-4, TP-2, and CPT-1. Therefore, there is currently no information to support the statement that sheet pile installation is infeasible.

Please let me know if you have questions.

Thanks,
Lizzie

Lizzie Carp (she/her)
President – WFSE Local 872
Wetland/Shoreland Specialist
WA Department of Ecology | Southwest Regional Office | Shorelands & Environmental Assistance Program
(564) 200-4184 | lizzie.carp@ecy.wa.gov

From: Carp, Lizzie (ECY)
Sent: Tuesday, September 30, 2025 4:31 PM
To: 'Nicole Floyd' <nfloyd@ci.olympia.wa.us>
Subject: RE: West Bay Yards

Hi again,

I’ve had a long conversation with our engineers in which they added clarity to these comments. I will send you an amended version tomorrow or the next day.

Lizzie


Lizzie Carp (she/her)
President – WFSE Local 872
Wetland/Shoreland Specialist
WA Department of Ecology | Southwest Regional Office | Shorelands & Environmental Assistance Program
(564) 200-4184 | lizzie.carp@ecy.wa.gov

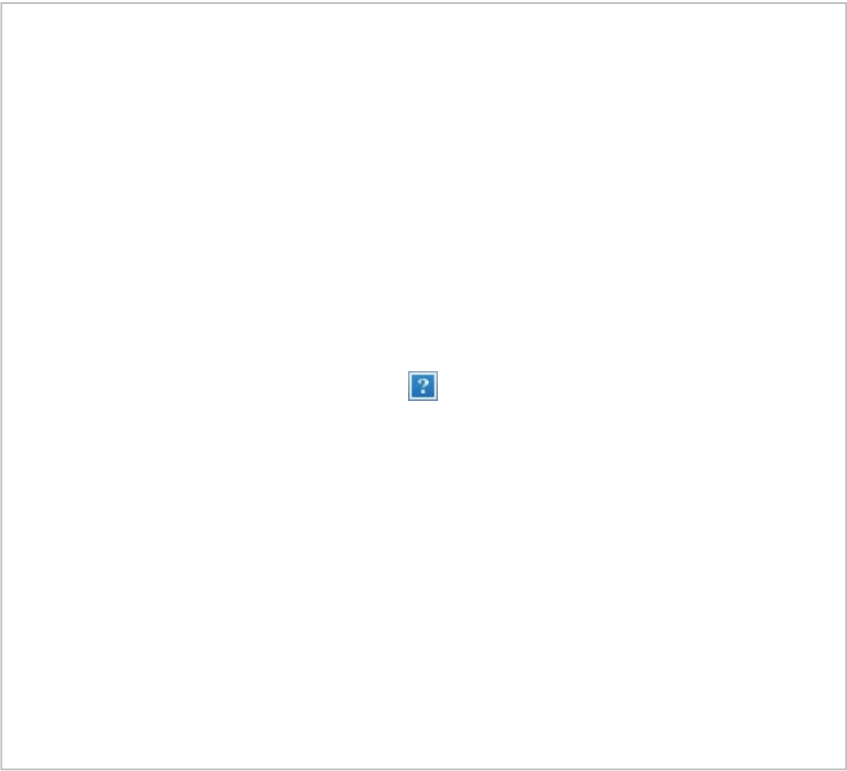
From: Carp, Lizzie (ECY)
Sent: Tuesday, September 30, 2025 1:49 PM
To: 'Nicole Floyd' <nfloyd@ci.olympia.wa.us>
Subject: RE: West Bay Yards

Hi Nicole,

The engineer I’ve been working with looped in our senior engineer and together they provided some comments that differ somewhat from the feedback we’ve given so far. Let me know if you have questions.

Concern	Reasoning
	<ul style="list-style-type: none"> ● The site at the south of this site is undergoing active erosion, despite it being in a more protected area. ● There needs to be enough fill material placed at the site to allow for the system to create its own natural berm. ● There is less fill material placed in Alternative 3 than in Alternative 2, making

<p>Erosion/ Stability</p>	<p>Alternative 3 less resilient. When reducing the gravel berm crest width from 16' to 5' the primary protection layer is being substantially reduced. If the top layer is washed away the gravel underneath will not adhere to the riprap, furthering erosion at the site.</p> <ul style="list-style-type: none"> • Less fill is a <i>disadvantage</i> for resiliency and adaptability to sea level rise. Less fill leads to less adaptivity/less protection • The main point for leaving the revetment was stability. In excavating sub-grade parking structures and adding ~5.5' of fill some shifting may occur.
<p>SLR</p>	<ul style="list-style-type: none"> • “2 Tiered Terrace Landscaping” act as 12' of a tiered seawall during storm events. This terraced landscaping will act as a hard-armored seawall. • The design report acknowledges localized SLR, however the plan only applies SLR to buildings, not across the whole project site. • The shoreline restoration design does not incorporate the cited City of Olympia Sea Level Response Plan with a moderate scenario of 18-24 inch increase, nor specifically address accommodating landward shoreline translation and managed retreat. • Design does <i>not</i> use recommended first floor elevations (19.2') • The elevation of the fire access is at 17'. This will be at risk during storm surges, as will the top soil and landscaping waterward of the buildings. This 17' is the standard VE Zone base flood elevation without accounting for sea level rise. <div data-bbox="410 1024 1339 1413" style="border: 1px solid black; padding: 5px;"> <p>A picture containing table? AI-generated content may be incorrect.</p>  </div>
<p>Groundwater</p>	<ul style="list-style-type: none"> • Groundwater table is extremely shallow, as evidenced from pit test. This will require a lot of pumping of potentially contaminated groundwater during construction. • Any safety concerns with excavation for underground parking structures? It was mentioned in the Geotech report there are debris present.
	<ul style="list-style-type: none"> • FEMA mapped VE zones should be considered for developing project elements. The shoreline areas of the project at the boundary of the VE zone will be subject to coastal high hazards and because elements of the project are built at the same elevation as those mapped in the VE zone, the BFE developed by FEMA in the “VE” zone due to wave action should not be ignored.

<p>Flooding</p>	<div data-bbox="496 144 1338 909" style="border: 1px solid black; height: 364px; width: 518px; margin-bottom: 10px;">  </div> <ul style="list-style-type: none"> ● Plans propose adding ~5.5' of material to raise the plaza level to 26', above the recommended first floor elevation. ● The fire access road/bike path is proposed at 17' NAVD88, at this elevation it will be subject to storm surges, wave action, and flooding. ● Concerns with inundation of daylight parking structures during storm events
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Questions:

1. Please provide the total fill and excavation volumes for Alternative 2 and Alternative 3. (Not just below OHWM). In comparing Alternatives 2 and 3, it appears that there is relatively small volume of removed riprap armor compared to the reduction in fill. In addition, it appears the removal of armor only occurs between 14' and 16' NAVD88 within the VE Zone and the rip rap armor is being replaced with top soil and mixed sand and gravel, and therefore potentially much more susceptible to erosion during high water events.

Thanks,
Lizzie

Lizzie Carp (she/her)
 President – WFSE Local 872
 Wetland/Shoreland Specialist
 WA Department of Ecology | Southwest Regional Office | Shorelands & Environmental Assistance Program
 (564) 200-4184 | lizzie.carp@ecy.wa.gov

From: Carp, Lizzie (ECY)

Sent: Tuesday, September 30, 2025 8:11 AM
To: 'Nicole Floyd' <nfloyd@ci.olympia.wa.us>
Subject: RE: West Bay Yards

Hi Nicole,

End of day today. Sorry for the delay. Our engineers took some extra time to discuss it.

Thanks,
Lizzie

Lizzie Carp (she/her)
President – WFSE Local 872
Wetland/Shoreland Specialist
WA Department of Ecology | Southwest Regional Office | Shorelands & Environmental Assistance
Program
(564) 200-4184 | lizzie.carp@ecy.wa.gov

From: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Sent: Monday, September 29, 2025 9:00 AM
To: Carp, Lizzie (ECY) <lc461@ECY.WA.GOV>
Subject: FW: West Bay Yards

External Email

When should I expect comments from your team?

From: Heather Burgess <hburgess@dfpblaw.com>
Sent: Sunday, September 28, 2025 6:06 PM
To: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Subject: RE: West Bay Yards

Hi Nicole,

Just checking in on this, have you heard back from Ecology/WDFW so as to be able to talk to the consultant team? I'd appreciate any update that you can provide so I can share with the Applicant/

Thanks,

Heather

HEATHER L. BURGESS | PARTNER
DICKSON FROHLICH PHILLIPS BURGESS PLLC

Direct: (360) 742-3504

Main Line: (360) 742-3500

Scheduling Contact: Jonathan Whittington, Legal Assistant, jwhittington@dfpblaw.com

From: Nicole Floyd <nfloyd@ci.olympia.wa.us>

Sent: Friday, September 19, 2025 12:49 PM

To: Heather Burgess <hburgess@dfpblaw.com>

Subject: West Bay Yards

Hey Heather,

I got your message. I will be contacting the consultants with my questions next week. Where I think we zigged/ zagged is that I want to get feedback from Ecology and WDFW before I coordinate because I am sure they will have meaningful input that I would want to share/discuss with the consultant team. It also ensures a clean/clear message. This is why I have held off. I have coordinated with Ecology and I am expecting their review anytime now.

I have also been in contact with our Hearing Examiner who says he is retiring at the end of the year from his law practice but he is continuing on as a Hearing Examiner because it's the part of the job he truly loves.

Nicole Floyd, AICP

Planning Manager | City of Olympia

601 4th Ave E. | Olympia, WA 98501

Ph: 360.570.3768 | Fax: 360.753.8087

Web: olympiawa.gov

From: [Shaun Dinubilo](#)
To: [Nicole Floyd](#); [Brittany Gillia](#); jessica.stone@dahp.wa.gov
Subject: RE: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards
Date: Tuesday, October 14, 2025 3:17:16 PM
Attachments: [image001.jpg](#)

Hello Nicole,

Thanks for reaching out. Due to this project needing to have a DAHP Excavation Permit for upland work, further USACE consultation, and the majority of my concerns on the report being addressed, I have no further recommended stipulation on the City's end besides requiring them to obtain a DAHP Excavation Permit prior to ground disturbance for the upland work. If it is still agreed that this site would be adversely affected, than any further site specific stipulations I would recommend would be addressed through the DAHP excavation permit discussions and/or consultation with the USACE.

I do appreciate that you and Brittany have been working with us on this contentious / complex project over the years.



Shaun Dinubilo
Archaeologist
FAA Certified (Section 107) sUAS Remote Pilot
Cultural Resource Department
Squaxin Island Tribe
200 S.E. Billy Frank Jr. Way
Shelton, WA 98584
Phone: 360-432-3998
Email: sdinubilo@squaxin.us
Office Hours: 7:30 am to 4:00 pm
Email is my preferred method of communication.

As per 43 CFR 7.18[a][1]) of the Archaeological Resource Protection Act, Section 304 of the National Historic Preservation Act, and RCW 42.56.300 of the Washington State Public Records Act-Archaeological Sites, all information concerning the location, character, and ownership of any cultural resource is exempt from public disclosure.

From: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Sent: Tuesday, October 14, 2025 1:21 PM
To: [Brittany Gillia <Brittany.Gillia@ci.olympia.wa.us>](mailto:Brittany.Gillia@ci.olympia.wa.us); [Shaun Dinubilo <sdinubilo@squaxin.us>](mailto:Shaun.Dinubilo@squaxin.us); jessica.stone@dahp.wa.gov
Subject: RE: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards

Hey Team,

I wanted to check in on the West Bay Yards project. Do you need any additional information before the City moves forward and issues a SEPA Determination? Are there mitigations you want to see attached to that determination?

Jessica/ DAHP: I am slightly unclear on your permit process, especially as it relates to the SEPA Determination the City will be making. For this reason, I want to confirm with you that you are ready for us to take that next step.

Shaun: I believe I have a better understanding of your process, but am curious if you have conditions you want tied to the SEPA and or if you would prefer to tie them to the Land Use (Shoreline Permit). This would include submittals you may want to see before they begin ground disturbing activities or updates to documents etc.

Please let me know your thoughts or if you want to meet to discuss further.

Nicole Floyd, AICP

Planning Manager | City of Olympia
601 4th Ave E. | Olympia, WA 98501
Ph: 360.570.3768 | Fax: 360.753.8087
Web: olympiawa.gov

From: Brittany Gillia <bgillia@ci.olympia.wa.us>
Sent: Tuesday, August 19, 2025 1:04 PM
To: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Subject: FW: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards

Brittany Gillia (*she/her*)
Associate Planner/Historic Preservation Officer
City of Olympia | Community Planning and Development Department
601 4th Ave E. | Olympia, WA 98501
Ph: 360.753.8427
Web: olympiawa.gov

From: Neil, Stephanie L CIV USARMY CENWS (USA) <Stephanie.L.Neil@usace.army.mil>
Sent: Monday, August 18, 2025 7:30 AM

To: Brittany Gillia <bgillia@ci.olympia.wa.us>; Shaun Dinubilo <sdinubilo@squaxin.us>; jessica.stone@dahp.wa.gov; Hammond, Alexandra M CIV (USA) <Alexandra.M.Hammond@usace.army.mil>
Cc: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Subject: RE: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards

Some people who received this message don't often get email from stephanie.l.neil@usace.army.mil. [Learn why this is important](#)

Hi All,

I took a look at the project description that was submitted and it is divided into upland development and shoreline restoration. My understanding is the upland development could be done independently from the shoreline work and is outside of the Corps' jurisdiction. There are a number of activities included under the heading shoreline restoration and I think we would be reviewing all of those actions during our Section 106 process. I have not reviewed this project in detail yet.

Stephanie

From: Brittany Gillia <bgillia@ci.olympia.wa.us>
Sent: Wednesday, August 13, 2025 3:15 PM
To: Shaun Dinubilo <sdinubilo@squaxin.us>; jessica.stone@dahp.wa.gov; Hammond, Alexandra M CIV (USA) <Alexandra.M.Hammond@usace.army.mil>; Neil, Stephanie L CIV USARMY CENWS (USA) <Stephanie.L.Neil@usace.army.mil>
Cc: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Subject: [Non-DoD Source] DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards

Hello,

I'm reaching out about the West Bay Yards project to touch base and make sure my cultural resource related comments on the City's land use review are aligned with the external processes that will be going on. The project has just sent in a new round of documents to address the comments from January, along with some status updates. My overview of the big questions in this email: Will they need a DAHP permit in addition to their USACE permitting? Did the applicant make sufficient revisions to their CR report? Did the applicant get their archaeological site reporting in proper order for the DAHP review to continue?

The applicant has applied for their USACE permitting-

Alex and Stephanie, can you confirm if the Section 106 process will cover the full project scope of the project or if a DAHP permit would be needed for upland work? If there are boundaries for your review that leave upland areas of the project excluded, can you please let

me know where your jurisdiction will end so that I can include what they will need in their potential DAHP permit?

The applicant has submitted a new Cultural Resource Report-

I am looking through the changes made and will send a separate email in a day or two to Shaun and Jessica to follow up with the January discussion between the Squaxin Island Tribe/DAHP/City. If folks from the Army Corps would want to be in the loop for that please let me know.

The applicant says they have uploaded the requested information to DAHP for review-

Jessica, can you please confirm that they have submitted the information that you need to continue your review? This is the comment from Stephanie Jolivette from earlier in the year:

“In addition, the DAHP has not yet been provided with a completed site inventory form for site 45TN00556. A confusing assortment of four partial site inventory forms are currently in the DAHP Project folder in the online WISAARD submittal portal. The most accurate form, denoted as Resource Id: 763451: Historic Sawmill and Shell Midden Properties, is still in “Draft” status in the database and has not yet been submitted for review. If this is the completed draft of the inventory form the consultant needs to hit the “Submit” button and then send an email to Smithsonian@dahp.wa.gov to initiate the review process.”

Thank you all for your coordination and help with getting me up to speed with your various review processes!

Brittany Gillia (*she/her*)

Associate Planner/Historic Preservation Officer

City of Olympia | Community Planning and Development Department

601 4th Ave E. | Olympia, WA 98501

Ph: 360.753.8427

Web: olympiawa.gov

From: [Teel, Steve \(ECY\)](#)
To: [Nicole Floyd](#)
Cc: [Steinweg, Noll E \(DFW\)](#); [Carp, Lizzie \(ECY\)](#); [Chu, Valerie \(ECY\)](#)
Subject: FW: Permit Application NWS-2022-0428-, Olympia, Thurston County (West Bay Dev)
Date: Thursday, October 16, 2025 4:06:04 PM
Attachments: [image001.png](#)
[image002.jpg](#)
[Permit_Notification_NWS-2022-0428-.pdf](#)
[20250924-PmtDrawings-revised.pdf](#)
[20251010-PN-NWS-2022-428.pdf](#)

Hi Nicole,
Forwarding this for your awareness in case you haven't received this notice. Ecology will be submitting comments.
Thanks,
Steve

Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Washington State Department of Ecology
Toxics Cleanup Program, Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-7775
Mobile (360) 890-0059
steve.teel@ecy.wa.gov



From: Conard, Whitney <Conard.Whitney@epa.gov>
Sent: Thursday, October 16, 2025 9:17 AM
To: Teel, Steve (ECY) <stee461@ECY.WA.GOV>
Subject: FW: Permit Application NWS-2022-0428-, Olympia, Thurston County (West Bay Dev)

External Email

Hi Steve,

I received a notification for a CWA 404 permit application for the Hardel Mutual Plywood MTCA site in the below email. I see you are listed as the Site Manager on Ecology's webpage for this MTCA site. I want to check in to see if you are already involved in the development of this project and to ask whether you need USACE to discuss with you directly or not regarding conditions that may or may not need to be added to this permit given its location.

This is not a CERCLA site so I don't have any comments specifically from EPA. If you don't have any concerns, I will likely pass on the opportunity to comment on the permit. However, I do want to make sure your concerns are incorporated – either through me requesting specific conditions or with you directly coordination with USACE. Direct coordination with USACE would be easiest.

Thank you,
Whitney

Whitney Conard, Ph.D.
Life Scientist
U.S. EPA, Region 10
Wetlands and Oceans Section, Water Division
1200 6th Ave, Suite #155, Mail Stop 19-C04
Seattle, Washington 98101-3188
Office: (206) 553-6123
Email: conard.whitney@epa.gov

From: Hammond, Alexandra M CIV (USA) <Alexandra.M.Hammond@usace.army.mil>
Sent: Tuesday, October 14, 2025 2:15 PM
To: Wright.Bernadette@epa.gov; Conard, Whitney <Conard.Whitney@epa.gov>; Burgess, Sarah <burgess.sarah@epa.gov>
Subject: Permit Application NWS-2022-0428-, Olympia, Thurston County (West Bay Dev)

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good afternoon,

I wanted to provide the permit notification for the above referenced project. The proposed work is to occur in a MTCA site (not CERCLA) and I wanted to provide the opportunity for comments.

Thanks!

Alex Hammond
Project Manager/Biologist
U.S. Army Corps of Engineers | Regulatory | Seattle District
alexandra.m.hammond@usace.army.mil | (206) 495-3014



From: [Stone, Jessica \(DAHP\)](#)
To: [Shaun Dinubilo](#); [Nicole Floyd](#); [Brittany Gillia](#)
Subject: RE: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards
Date: Friday, October 17, 2025 2:15:51 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)

You don't often get email from jessica.stone@dahp.wa.gov. [Learn why this is important](#)

Hi Nicole,

As Shaun said, a DAHP permit will be needed for the upland work and should be obtained prior to any ground disturbance per RCW 27.53. I think that is probably the only stipulation we would need, so to answer your question, yes I think we are ok to proceed.

Thanks!

Jessica



Jessica Stone, Ph.D (she/her)
Assistant State Archaeologist

Email: jessica.stone@dahp.wa.gov | www.dahp.wa.gov
Cell: (360) 890-2633 | Main Office: (360) 586-3065
Hours: 7:30-4:00 PST Monday-Friday
Physical Address: 1110 S. Capitol Way, Suite 30, Olympia, WA 98501
Mailing Address: PO Box 48343, Olympia, WA 98504-8343

From: Shaun Dinubilo <sdinubilo@squaxin.us>
Sent: Tuesday, October 14, 2025 3:17 PM
To: Nicole Floyd <nfloyd@ci.olympia.wa.us>; Brittany Gillia <bgillia@ci.olympia.wa.us>; Stone, Jessica (DAHP) <jessica.stone@dahp.wa.gov>
Subject: RE: DAHP Project 2021-07-04606 / NWS-2022-428 / RE: West Bay Yards

External Email

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Thanks for reaching out. Due to this project needing to have a DAHP Excavation Permit for upland work, further USACE consultation, and the majority of my concerns on the report being addressed, I have no further recommended stipulation on the City's end besides requiring them to obtain a DAHP Excavation Permit prior to ground disturbance for the upland work. If it is still agreed that this site would be adversely affected, than any further site specific stipulations I would recommend would be addressed through the DAHP excavation permit discussions and/or consultation with

the USACE.

I do appreciate that you and Brittany have been working with us on this contentious / complex project over the years.



Shaun Dinubilo
Archaeologist
FAA Certified (Section 107) sUAS Remote Pilot
Cultural Resource Department
Squaxin Island Tribe
200 S.E. Billy Frank Jr. Way
Shelton, WA 98584
Phone: 360-432-3998
Email: sdinubilo@squaxin.us
Office Hours: 7:30 am to 4:00 pm

Email is my preferred method of communication.

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Nicole Floyd, AICP

Planning Manager | City of Olympia
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Web: olympiawa.gov

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Sent: Tuesday, August 19, 2025 1:04 PM
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Brittany Gillia (*she/her*)

Associate Planner/Historic Preservation Officer
City of Olympia | Community Planning and Development Department
601 4th Ave E. | Olympia, WA 98501
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Sent: Monday, August 18, 2025 7:30 AM
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Cc: Nicole Floyd <nfloyd@ci.olympia.wa.us>
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are a number of activities included under the heading shoreline restoration and I think we would be reviewing all of those actions during our Section 106 process. I have not reviewed this project in detail yet.

Stephanie

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To: Shaun Dinubilo <sdinubilo@squaxin.us>; jessica.stone@dahp.wa.gov; Hammond, Alexandra M CIV (USA) <Alexandra.M.Hammond@usace.army.mil>; Neil, Stephanie L CIV USARMY CENWS (USA) <Stephanie.L.Neil@usace.army.mil>
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I am looking through the changes made and will send a separate email in a day or two to Shaun and Jessica to follow up with the January discussion between the Squaxin Island Tribe/DAHP/City. If folks from the Army Corps would want to be in the loop for that please let me know.

The applicant says they have uploaded the requested information to DAHP for review-

Jessica, can you please confirm that they have submitted the information that you need to continue your review? This is the comment from Stephanie Jolivette from earlier in the year:

“In addition, the DAHP has not yet been provided with a completed site inventory form for site 45TN00556. A confusing assortment of four partial site inventory forms are currently in the DAHP Project folder in the online WISAARD submittal portal. The most accurate form, denoted as Resource Id: 763451: Historic Sawmill and Shell Midden Properties, is still in “Draft” status in the database and has not yet been submitted for review. If this is the completed draft of the inventory form the consultant needs to hit the “Submit” button and then send an email to Smithsonian@dahp.wa.gov to initiate the review process.”

Thank you all for your coordination and help with getting me up to speed with your various review processes!

Brittany Gillia (*she/her*)

Associate Planner/Historic Preservation Officer

City of Olympia | Community Planning and Development Department

601 4th Ave E. | Olympia, WA 98501

Ph: 360.753.8427

Web: olympiawa.gov

From: [Steinweg, Noll E \(DFW\)](#)
To: [Nicole Floyd](#)
Subject: RE: West Bay Yards Revisions
Date: Thursday, October 30, 2025 3:06:18 PM

Hi Nicole,

Thank you for the opportunity to review another round of documents for West Bay Yards.

- A Hydraulic Project Approval (HPA) permit from WDFW is required for this work. The goal of the HPA is to achieve no-net loss to fish life and fish habitat for work in waters of the state. The proponent can reach out to me directly to begin HPA permitting, or start on our website here:
<https://wdfw.wa.gov/licenses/environmental/hpa>
- We generally agree with the June 2, 2025 “Portadam Feasibility Assessment” provided, but would like to note that there are other ways to achieve site isolation such as sheet pile if alternative 4 is pursued.
- WDFW is generally supportive of alternative 3 which appears to balance the goals of the proponent with habitat considerations on site. The HPA process will ensure that remaining fish life impacts are addressed.

Sincerely, Noll

Noll Steinweg
Area Habitat Biologist
Region 6, Olympia Office
Washington Department of Fish and Wildlife
360-628-2173 (cell)
Work schedule: Monday-Thursday

From: Nicole Floyd <nflloyd@ci.olympia.wa.us>
Sent: Thursday, August 28, 2025 4:49 PM
To: Carp, Lizzie (ECY) <lcar461@ECY.WA.GOV>; Steinweg, Noll E (DFW) <Noll.Steinweg@dfw.wa.gov>
Subject: West Bay Yards Revisions

External Email

Hey Lizzie and Noll,

Lizzie: Can you circulate the revisions attached to your shoreline team and get back to me

regarding the revised design.

Noll: Are you willing to evaluate based on your past experience with permitting similar project types:

For a recap, their original design is option 2, where they moved the OHWM approximately 30' waterward. Option 3, which is currently the preferred method moves the OHWM waterward 17'. Option 4 would not move the OHWM waterward at all. Their task was to show why Option 3 is the one that represents the least fill and minimum necessary to accomplish the restoration as it is their preferred alternative. Based on my cursory review their approach seems to boil down to the infeasibility of alternative 4 which they say is not possible due primarily to it being infeasible to construct. Their primary reason is that the sediment type they would need to dig into it unstable and a bad idea. They have updated the images / plans previously provided, but not significantly. Essentially, all three alternatives show nearly the exact same design just on different locations within the beach. Their updated analysis recognizes this and therefore no longer uses beach thickness or wave action as the driver for one of the options vs another. They provided some analysis regarding Ecology's previous response. I would appreciate your teams take on this. Most of the documents are too big to send, but I can put them into an FTP site for you. Documents you may want to review include:

1. Portadam Feasibility Assessment – attached
2. Response Table - attached
3. Landscape plans (attached)
4. Restoration Mitigation Plan (10mb)
5. Shoreline Restoration design Report (20mb)

I am meeting with the applicant the week of September 8th. If you could provide comments by then, that would be great. If you need a little more time, I can probably manage that as well. I appreciate your input.

Nicole Floyd, AICP

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