LDC Surveying Engineering Planning

April 4, 2024

Thurston County
Community Planning And Economic Development
3000 Pacific Ave SE
Olympia, WA 98501

RE: West Olympia Development – Response to City Review Comments
Project Number: 2023100649

Dear Reviewer(s),

Please refer to our responses below which address all review comments received from the Thurston County on March 05, 2024, regarding the West Olympia Development Permit submittal package. You will find the markup comments listed in the order that they were written followed by our response in ***italics***.

Community Planning and Economic Development (CPED)

Critical Areas

1. The submitted site plan should show all buffer lines, as well as exact areas where reduction is proposed versus buffer averaging. The copy I was looking at was a little unclear in a few spots, perhaps this will be clearer in the hardcopy.

   Response: The buffer delineation has been clarified on the plans and verified with the wetland consultant.

2. Typically, subdivisions that propose areas for buffer reduction would only be approved for the minimum necessary reduction. On the current site plan, there is a large area of buffer shown as reduced, but it isn't corresponding to proposed development. The buffer line should be pushed back out if there is no proposed development within those areas of the buffer.

   Response: Noted – buffer reduction has been changed to only be proposed along areas corresponding to the proposed development. The buffer line has been pushed out in areas where there is no proposed development.

3. Wetland B measures less than 1000 feet, which generally means it does not trigger a protective buffer per TCC 24.30.015. But I am unclear if this wetland is possibly meeting mosaic criteria, and would be lumped in with Wetland C? Since these wetlands are being derived conservatively, it might be okay for now to keep it as is with the buffer, but we can discuss this further.

   Response: Noted – buffer is currently applied to both Wetland B & C as shown on plans.

4. The emphasis on utilizing alpha-alpha- dipyridyl within the report requires a little tweaking, as it is only a test positive indicator for hydric soils. What this means is it could test negative, but that doesn't necessarily mean it isn't meeting hydric soils. The ultimate test will be whether the area is submerged for 14 days during the growing season. Please see the attached email from DOE regarding this test. I would recommend the language regarding alpha-alpha-dipyridyl be revised within the report.

   Response: Noted – language regarding alpha-alpha-dipyridyl has been revised within the report.

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Off-site Wells

5. The application was marked "yes" in response to any water supplies located within 200 feet of the property. However, there are no off-site wells shown on the subdivision map. If no off-site wells are identified, the applicant must provide details as to how the information was confirmed. It is the applicant's responsibility to locate any existing off-site wells within 200 feet of the project site and show their locations on the map with their associated 100-foot sanitary control radii. Conducting field visits and communicating with neighboring property owners is recommended. Permit records can be viewed online through the Building Development Center by entering the tax parcel numbers at https://weblink.co.thurston.wa.us/dspublic/customsearch.aspx?searchname=search&cr=1

Response: Noted – the County's Laserfiche system was utilized to reference existing well information for all parcels surrounding the project parcel. There is no record of wells existing within 200-feet of the project parcel; however, we have been in contact with the property owner of parcel 83012300600, which we're told contains at least one well. Therefore, we are in the process of locating any potential wells and will update plans if wells are found to be within 200 feet of the proposed development.

Integrated Pest Management Plan

6. A revised IMP Plan must be submitted addressing the comments added to the document. Please see attached.

Response: Noted – a revised IMP Plan has been submitted that addresses the comments added to the document.

Engineering Plans Examiner

7. The City will review for approval and permitting of water, sewer, streetlighting systems and portions of frontage and stormwater within city limits (24th Ave NW).

Response: Noted

8. Design review, approval, permitting, and subsequent improvements installed shall be in conformance with the current Engineering Design and Development Standards (EDDS) of the City of Olympia. Following Land Use approval and prior to construction, the applicant shall submit detailed engineering design drawings to the Community Planning and Development Department for detailed technical review, approval and permitting.

Response: Noted – detailed engineering design drawings shall be submitted to the Community Planning and Development Department following Land Use approval.

Water Mains (2.050.B)

9. The City of Olympia water system has capacity for this proposed development project. Water is currently available to the site from an existing 8-in PVC main at the end of Milroy St and an existing S-in PVC main that extends from the cul-de-sac of Lenox Ct to 24tnAve. In compliance with the Water Comprehensive Plan and the current EDDS to supply water to this project will require the following improvements:

a. Extend and loop the existing water mains from Milroy St and 24th Ave (from Lenox Ct) along 24th Ave and through the development to serve all lots.

b. Following preliminary plat approval, show on engineering plans for review and permitting fire hydrants at appropriate spacing for adequate fire suppression needs complete with valve configuration, size, and type of pipe for all water main sections, services, meters, and plan profiles.

Responses: Noted – water main from Milroy St and 24th Ave NW has been extended through the development to serve all lots. Following P-Plat approval, fire hydrant spacing and suppression needs will be shown on engineering plans.

Sewer Mains (2.050.A)

10. The City of Olympia's sanitary sewer system has capacity for this proposed project. City sewer is currently available to the site from an existing S-in PVC main at the end of Milroy St and an existing 8-in PVC main that extends from the cul-de-sac of Lenox Ct to 24t Ave. ln compliance with the Sewer Comprehensive Plan and the current EDDS to supply sewer to this project will require the following improvements:

a. Extend sewer throughout the development from the existing sewer main in 24th Ave (from Lenox Ct). Gravity sewer will extend as far as possible with the rest of the development served via grinder force main.

b. Following preliminary plat approval, show on the engineering plans for review and permitting size and type of pipe for all sewer main sections, sewer stub outs with cleanout at the ROW line, plan profiles, pig port at the end of the grinder force main and the maintenance hole where the force main discharges and the next maintenance hole downstream will be PVC lined to prevent corrosion.

Response: Noted – sewer has been extended throughout the development from the existing sewer main in 24th Ave NW and gravity sewer has been extended as far as possible with the rest of the development served via grinder force main. Detailed sewer specifications will be shown on the engineering plans following P-Plat approval.

Transportation- Streets and Allys (2.040)

11. The subject property is within the City of Olympia's Urban Growth Area therefore any frontage improvements and internal streets are to be constructed to standards set forth in the current City of Olympia EDDS.

a. Please revise the trip generation estimate in a traffic letter and qualitatively describe the level of impact to the surrounding neighborhood to satisfy the neighborhood concerns. Please include a trip distribution in the revised trip generation estimate. Note: a neighborhood petition received by the City of Olympia on L2/U2O23 (enclosed) would like a Traffic Impact Analysis done. City will provide the most current traffic count data on Milroy St.

Response: Noted – a more extensive Transportation Memorandum is included with this submittal. It was also determined after discussion with the City of Olympia that a TIA is not required.

b. Public Works (PW) Transportation is recommending two traffic calming devices - one on Milroy St and another on Burbank Ave to mitigate speed and safety issues. PW is not opposed to additional traffic calming device on24tn Ave. Because the 90-degree corners on 24tnAve act as traffic calming, only one device is recommended. Intersections can provide similar effects. Typically traffic calming devices need to be spaced 250 to 500 feet and start at least 150 feet from an intersection.

Response: Noted – two traffic calming devices have been provided on the plans – one near 2224 Milroy St. and one on 24th Ave NW. A traffic calming device will also be installed near 1925 Burbank Ave.

c. No private access lane permitted per EDDS 2.040(8)2 -Sufficient space is available with lot reconfiguration.

Response: On-site roadway is public with extension of private driveway to serve lots 28-30. Private lane as shown on plans provides hammerhead turnaround for emergency vehicles and pedestrian access path for continuity. Further, Thurston County dictates road requirements within the proposed development because of its location with the Urban Growth Area rather than within city limits. As such, Thurston County has communicated that the private road is acceptable so long as it is at least 20'-0" wide and a walkway is provided – both of which have been included.

d. The cul-de-sac needs to be designed to EDDS std. dwg. 4-5. Currently missing sidewalk, planter, solid waste container pad and traffic island. Please see attached.

Response: Noted – the proposed cul-de-sac has been redesigned per EDDS std. dwg 4-5 as shown on plans.

e. The proposed local access street Road A is to be designed per EDDS std. dwg. 4-2J. Local access streetlighting is needed on Road A and 24th Ave. Please note, streetlighting within the development will be private and maintained by the HOA until the area is annexed into city limits.

Response: Noted – the proposed local access street Road A has been designed per EDDS std. dwg. 4-2J with the exception of the parking lane. Thurston County dictates road requirements within the proposed development because of its location with the Urban Growth Area rather than within city limits. Street lighting serving Road A has been added to the plans.

f. Local access street stubs needed to all undeveloped parcels greater than one acre with potential to add lots under current zoning (R4-9). Local Access stub to the east. If the unopened 24th Ave to the west runs through a wetland, no street stub is needed to the west.

Response: As communicated by the City of Olympia and Thurston County, this comment is not code-mandated within the Thurston County Code. This is a requirement of the Olympia Municipal Code; however, Thurston County dictates road requirements within the proposed development because of its location with the Urban Growth Area rather than within city limits. As such, we are not proposing a street stub to undeveloped parcels to the east. Moreover, due to unique site constraints, namely, the wetlands within the site, including a street stub to adjacent parcels would prevent the proposed development from reaching minimum density requirements per zoning.

g. Maintain the Local Access Street connection to the unopened ROW adjacent to parcel # 83009300700 for future street/bike/pedestrian connection to the north.

Response: As communicated by the City of Olympia and Thurston County, this comment is not code-mandated within the Thurston County Code. This is a requirement of the Olympia Municipal Code; however, Thurston County dictates road requirements within the proposed development because of its location with the Urban Growth Area rather than within city limits. The width of the "ROW" referenced is approximately 20 feet, which will not accommodate a future street/bike/pedestrian connection. Moreover, we have been informed by the owner of parcel 83009300700 that this unopened ROW is not city or county owned or controlled; rather, this unopened ROW has been previously vacated and now is privately owned. As such, we are not proposing a street stub to the north.

h. No marked crosswalks on any of the roads.

Response: Noted – marked crosswalks have been removed from Road A.

i. Directional ramps are needed on the NE corner of intersection of 24tn Ave and Road A along with a minimum 50 ft radius curve.

Response: Directional ramps have been added on the NE corner of the intersection of 24th Ave and Road A along with a minimum 50 ft radius curve.

Stormwater

12. With frontage improvements within city ROW (24th Ave) are to be installed and portions of the stormwater system for the development proposal are within city ROW, these elements will need to comply with the City of Olympia's 2022 Drainage Design and Erosion Control Manual (DDECM). Please use Guide sheet - 1C as reference guide for what is required for stormwater review by the City of Olympia. This should be separate from stormwater plans reviewed and approved by Thurston County.

Response: Noted – stormwater scoping meeting has been conducted with the City and plans for providing treatment and flow control for the frontage improvements complies with the City of Olympia's 2022 DDECM. It was agreed within the stormwater scoping meeting that one drainage report shall be provided for the proposed project with subsections detailing the stormwater approach for the frontage improvements.

13. A stormwater scoping meeting will be required. This requires Guide sheet - 18 to be completed and submitted to the city at the time of meeting request. This will need to be done prior to the submittal of revisions to the County.

Response: Noted – a stormwater scoping meeting was conducted with the City of Olympia on March 13, 2024.

Parking Mitigation Fees

14. This project is subject to City of Olympia Parks SEPA Mitigation costs of development as a condition of final approval. In order to determine the total of Parks SEPA Mitigation fees the following will need to be addressed:

a. Please provide clarification on the number of units of each housing type (i.e.- single family homes, townhomes, apartments, ADUs, etc.). Per plan sheets PP0-1 throughPP-03, it appears there are a total of 34 individual lots. However, on plan sheet 11.00, Lots #24 and #25 are labeled as a duplex; Lots #26 through #29 are labeled as a fourplex; and Lots #31 through #34 are labeled as a fourplex. As depicted in plan sheets PP-01 through PP-03the city would consider these single-family style townhomes on their own lots and shared wall.
b. Parks SEPA Mitigation fees will be calculated upon further clarification.

Response: Noted – clarification on the 34 single-family home lots has been added to the plans. There are no longer any proposed duplexes, triplexes, fourplexes, or detached ADUs as part of the development.

Nisqually Indian Tribe

15. The Nisqually Indian Tribe's THPO has reviewed the notice of application and supplemental materials that you provided for the above-named project and requests that a cultural resources survey be required before any ground-disturbing activities are permitted. Please keep us informed if there are any inadvertent Discoveries of Archaeological Resources/Human Burials.

Response: Request Noted; additionally, we have added a note to the civil plans concerning any unanticipated discoveries of protected cultural materials.

Drainage Scoping Report & Plans

1. Applicant shall conduct a thorough review of their submitted materials to ensure they are accurate.

   Response: Noted – thorough review of submitted materials has been performed by the applicant and engineer prior to submittal.

2. Applicant shall complete an Engineered Drainage & Erosion Control Plan (DECP) addressing Core Requirements #1-11of the 2022 Drainage Design and Erosion Control Manual (DDECM) prepared by a civil engineer licensed in the state of Washington.

   Response: Noted – Engineered Drainage & Erosion Control Plan (DECP) has been prepared and submitted by a civil engineer licensed in the state of Washington.

3. Applicant shall submit an electronic copy of the WWHM2012 model with their DECP. Applicant shall also use the most current version of WWHM. The most recent version can be found at: https://ecology.wa.gov/Regulations-Permits/Guidance-techincal-assistance/Stormwater-permittee-guidance-resources/Stormwater-manuals/Western-Washington-Hydrology-Model.

   Response: Noted – electronic copy of the MGS FLOOD model has been submitted along with the DECP.

4. All projects using infiltration facilities (other than single family residential drywells) shall submit a verification testing plan and contingency plan for under performance. The plan shall include a reasonable "worst-case" projection of long-term infiltration performance and describe methods and costs for improving/restoring performance and/or expanding facility size. See Sections 3.1.5 & 3.1.6, Volume V of the DDECM.

   Response: Noted – no infiltration facilities other than single-family residential infiltration trenches are proposed with the development. The contingency plan for the worst-case project has been detailed within the drainage report.

5. Thurston County has been collecting data on rainfall and water levels at various locations within the county. This information may be used for planning purposes only and can be found at the following link: https://www.thurstoncountywa.gov/sw/Pages/monitoring-dashboard.aspx

   Response: Noted

6. Thurston County has adopted an interim Stormwater Vesting Policy. This policy can be found at the following link: https://s3.us-west2.amazonaws.com/thurstoncountywa.gov.if-us-west-2/s3fs-public/2023-01/cped-storm-docs-2022DDECM-Interim-Vesting-Memorandum.pdf

   Response: Noted

7. Applicant shall submit completed Drainage Report Checklists including, but not limited to:
   a. Project Elements Submission Completeness
   b. Drainage Report Required Elements
   c. Construction Plan Required Elements
   d. Any checklists relevant to planned Best Management Practices (BMP's)
   e. LID.02 Soil Preservation and Amendment Checklist

   Checklist are available on the Thurston County Website at: https://www.thurstoncountywa.gov/sw/Pages/dm-2022-docs.aspx

   Response: Noted – Drainage Report checklists have been included with this submittal.

8. The applicant shall meet all of Washington State Department of Ecology's (DOE) UIC requirements for proposed underground infiltration facilities. The facilities shall be registered and Rule Authorized/permitted.

Response: Noted

9. Landscape & irrigation Plans shall be submitted for review.

Response: Noted – landscape plans are included with this submittal.

10. No trees or shrubs shall be planted within 25-feet of catch basins, manholes, inlet/outlet of pipes, spillways, or level spreaders. The Landscaping Plans shall reflect this.

Response: Noted – no trees or shrubs shall be planted within 25-feet of catch basins, manholes, inlet/outlet pipes, spillways, or level spreaders and is reflected on the landscape plans.

11. If proprietary device(s) are proposed for runoff treatment, Administrator approval will be required. Please submit a separate request for Administrator approval. See Volume V, Chapter 9 of the DDECM. The request shall include all items in the administrative memo in the following link: https://s3.us-west-2.amazonaws.com/thurstoncountywa.gov.if-us-west-2/s3fs-public/2023-08/storm-docs-emerging-technologies.pdf

Response: Noted – a proprietary treatment device memorandum will be completed and submitted at the time of civil permit submittal.

Civil Engineering Plans and Reports

12. Vehicular access will be required to each stormwater dispersion system and treatment device. Please see Appendix V-E, Volume V of the DDECM for access road/ramp requirements.

Response: Noted – a vehicular access road designed per Volume V of the DDECM has been provided to each stormwater flow control and treatment device.

13. Please ensure that the 100-year developed flows for each dispersion device does not exceed the following:

a. Rock dispersion pad: 0.2-cfs maximum
b. 50-feet dispersion trench: 0.5-cfs maximum
c. See Section 2.2.11.3.1, Volume V for additional requirements/guidance for maximum allowable flow rates into particular dispersion devices'.

Response: Noted – 100-year developed flows have been confirmed not to exceed the devices shown.

Core Requirements (CR) #1: Stormwater Site Planning

14. A complete Engineered Drainage & Erosion Control Plan (DECP) and Construction Stormwater Pollution Prevention Plan (SWPPP) is required to meet Core Requirement #1.

Response: Noted – a complete DECP and SWPPP have been provided with this submittal.

Core Requirements (CR) #2: Stormwater Pollution Prevention Plan

15. A Construction SWPPP is required to meet Core Requirement #2. The Construction SWPPP shall be submitted and accepted prior to permit issuance.

Response: Noted – A construction SWPPP has been completed and provided with this submittal.

Core Requirements (CR) #3: Source Control of Pollution

16. Applicant shall submit a completed Source Control Plan with their Drainage and Erosion Control Plan. A template Source Control Plan is available on the Thurston County website at: https://www.thurstoncountywa.gov/sw/Pages/dm-2022-docs.aspx.

Response: Noted – A Source Control Plan has been completed and submitted with the DECP.

Core Requirements (CR) #4: Preservation of Natural Drainage Systems and Outfalls

17. Existing drainage patterns shall be shown on the plans and preserved to the maximum extent practicable.

Response: Noted – existing drainage patterns are now shown on plans and preserved to the maximum extent practicable.

Core Requirement #4: On-site Stormwater Management

18. Per Table 2-Lin Section 2.4.6, Volume I of the DDECM, the project is located inside the City of Olympia's Urban Growth Area (UGA) on a parcel of any size. Therefore, the project shall meet LID Performance Standards and BMP LID.02 or, List #2 located in Section 2.4.6.2, Volume I of the DDECM. From the submitted Drainage Scoping Report, the project is proposing to meet the List Approach' which could satisfy this Core Requirement.

Response: Noted – the proposed project shall meet the requirements of List #2 in Section 2.4.6.2, Volume I of the DDECM.

19. BMP LID.02 is required for lawn and landscaped areas. The extent of BMP LID.02 Post Construction Soil Quality and Depth must be shown on the plans. Note, all lawn/landscape areas subject to BMP LID.02 may be modeled as pasture in WWHM.

Response: Noted – LID.02 extents have been shown on the Soil Management Plan sheet within the drainage report appendices.

20. Applicant shall submit a site-specific Soil Management Plan with their application. Refer to the Design Guide for Post-Construction Soils Quality and Depth for the submittal requirements. Please see link for additional information: https://www.thurstoncountywa.gov/sw/swdocuments/DG-4%20POST-CONSTR%20SOILS.pdf

Response: Noted – site specific Soil Management Plan has been prepared and included in Appendix 9 of the drainage report for this submittal.

Core Requirement #6: Runoff Treatment

21. If pollution generating hard surfaces exceeds 5,000-square feet within a single threshold discharge area, the proposed project will be classified as residential. Therefore, basic runoff treatment is required. As of now, the Drainage Scoping Report Plans indicate enhanced treatment will be constructed which could satisfy this requirement.

Response: Noted – basic treatment is required for the proposed development; however, enhanced treatment will be provided as shown.

22. Verify horizontal setbacks to property lines, buildings, septic systems, drinking water wells and other

on-site (and off-site) features are met. See Appendix V-E, Volume V for setback requirements.

Response: Noted – horizontal setbacks to property lines, buildings, septic systems, drinking water wells, and other features have been verified and met.

23. Drainage patterns shall be shown on the plans and preserved to the maximum extent practicable.

Response: Drainage patterns have been added to the plans and shall be preserved to the maximum extent practicable.

24. The project will need to provide runoff treatment for any frontage improvements constructed for this project. It appears all proposed frontage improvements along 24th Ave NW reside within City of Olympia's jurisdiction.

Response: Noted – runoff treatment and flow control shall be provided for the frontage improvements along 24th Ave NW and have been detailed within the drainage report.

Core Requirement #7: Flow Control

25. The project is proposing more than 10,000-SF of impervious surface(s). Therefore, flow control shall be provided for this project. From the report, it indicated that Wetland Hydroperiod Protection is required and supersedes CR #7 requirements. Per portion of Section 2.4.9.6, Volume of the 2022 DDECM, "If the designer is unable to meet both requirements (CR #7 and CR #8), then the requirement to maintain the hydroperiod of the wetland becomes the overriding concern and the designer must show compliance with Core Requirement #8. Wetlands Protection. If this is the case, the designer must also provide documentation detailing why they are unable to meet both requirements." Aker review, Water Resources will require additional documentation on how CR #7 cannot be met when meeting CR#8 Hydroperiod Protection requirements.

Response: Noted – wetland hydroperiod protection is no longer required due to the on-site wetlands not containing a breeding population of amphibians, as confirmed by the wetland consultant. As a result, flow control will now be met for the entire proposed development through the use of on-lot downspout infiltration trenches and a detention pond. CR #8 no longer overrides CR #7.

26. Applicant must submit WWHM2012 modeling which shows the proposed BMP'S meeting the flow control requirements.

Response: Noted – MGS FLOOD modeling showing the proposed BMPs meeting the flow control requirements has been included in Appendix 10 of the drainage report.

27. Verify horizontal setbacks to property lines, buildings, septic systems, drinking water wells and other on-site (and off-site) features are met. See Appendix V-E, Volume V for setback requirements.

Response: Noted – horizontal setback requirements have been met and verified for the proposed stormwater system.

28. The project will need to provide flow control for any frontage improvements constructed for this project. It appears all proposed frontage improvements along 24th Ave NW reside within City of Olympia's jurisdiction.

Response: Noted – flow control and treatment are provided for the frontage improvements along 24th Ave NW.

29. The applicant can utilize the County's Laserfiche system to find existing well and septic information on

adjacent lots. Please see the following link to search for said information: https://webIink.co.thurston.wa.us/dspubIic/customsearch.asox?searchname=search&cr=1

Response: Noted – the County's Laserfiche system was used to determine existing wells and septic systems around the project parcel. No wells existing within a 100-foot radius of the project site were found after searching these records; however, we have been in contact with the property owner of parcel 83012300600, which we're told contains at least one well. Therefore, we are in the process of locating any potential wells and will update plans if wells are found. There are two existing septic drain fields located on TC parcels 09750033000 and 09750028003 that are outside of the extents shown on the plans but are confirmed to have sufficient setback requirements for the proposed development.

Core Requirement #8: Wetland Protection

30. Per Thurston County Geodata, wetlands and/or associated buffers are mapped on-site. From this, wetland protection is anticipated at this time. Note, other Thurston County departments may have additional requirements on wetlands to be addressed.

Response: Noted – on-site wetlands require general protection and protection from pollutants which will be achieved with the proposed design. Thorough section provided within drainage report.

31. From the submitted Drainage Report, the report states that Method 2 will be implemented to satisfy this requirement. Per DOE's 2019 SWMMWW, there are two (2) criteria that must be met to comply with Wetland Hydroperiod Protection for Method 2; the Mean Daily Total Discharge Volumes from the site and Mean Monthly Total Discharge Volumes from the site. From review, it appears the Site has numerous instances where the site is not meeting Criteria #1 (Mean Daily Totals). From this, the design will most likely need modifications to meet this requirement.

Response: Method 2 is no longer needed to satisfy the wetland protection requirements as the wetland biologist confirmed that there are no breeding amphibians for the wetlands on-site. The on-site wetlands only require general protection and protection from pollution and flow control will now be provided for the proposed development.

32. The applicant shall anticipate conducting wetland monitoring. See 'Method 1' in I-C.4, Volume I of the SWMMWW for monitoring timeline and requirements.

Response: Noted – the need for conducting wetland monitoring is understood.

Core Requirement #9: Operations and Maintenance

33. Applicant must develop and record with the Thurston County Auditor an agreement to maintain stormwater facilities and implement a pollution source control plan for all those facilities to be maintained by the property owner. The Operations Plan and Source Control Plan shaft be included as attachments to any recorded document(s).

Response: Noted – a source control plan has been completed and provided with this submittal. The agreement to maintain stormwater facilities will be provided at the time of civil permit submittal.

Core Requirement #10: Financial Liability

34. The applicant shall provide a financial guarantee to the DDECM Administrator to ensure satisfactory maintenance of drainage facilities (i.e., Infiltration facilities) for a minimum of 2 years from final acceptance of the project.

Response: Noted – the financial guarantee for ensuring satisfactory maintenance of drainage facilities will be provided at the time of civil permit submittal.

Core Requirement #11: Offsite Analysis and Mitigation

35. A qualitative downstream analysis shall be performed for any potential runoff from the site, even if 100-percent infiltration is proposed. The downstream analysis will include the flow path from the site to the receiving water or up to one mile, whichever is less, even if all runoff will be fully dispersed on site. See section 2.4.12, Volume I of the DDECM for requirements. Hydrogeologic review supports this comment. The shallow surfacing water levels in well MW-4 during January 2023, indicating offsite runoff may be generated by the project. Shallow glacial till (dense sand/silt in MW-4) and test pit/well records indicating low permeability layers in other subsurface test locations indicate that shallow seasonal perched water levels may exacerbate the potential for offsite runoff under post-development conditions.

Response: Noted – a qualitative downstream analysis has been described within the drainage report that details the flow path from the site to the receiving water body 1 mile away.

36. As of now, the downstream analysis in Section 2.3/2.4 of the Drainage Report in the report is insufficient. With the project proposing to release stormwater above the pre-developed rate into the on-site wetland(s), this could affect adjacent parcels where they could potentially see runoff that historically, has never affected them. Hydrogeologic review supports this comment. The widespread presence of shallow till in this area found during USGS studies is associated with complaints from landowners adjacent to prior projects in this area where infiltration may have been ineffective and excessive offsite runoff was generated. Shallow glacial till (dense sand/silt in MW-4) and test pit/well records on this site support USGS findings that shallow seasonal perched water levels are likely. These may exacerbate the potential for offsite runoff under post-development conditions.

Response: Noted – the downstream analysis section of the drainage report has been updated to describe at length the flow path of any potential water leaving the site for a travel distance of up to 1 mile.

Prethreshold Consultation

Solid Wast Management: Derk Rockett

1. The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: Construction & Demolition Guidance. All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

Response: Noted – any potentially dangerous or hazardous waste materials will be removed and appropriately managed prior to demolition.

Toxics Cleanup: Thomas Middleton

2. 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) 4O7-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Thomas Middleton with the SWRO, Toxics Cleanup Program at the phone number provided above.

Response: Noted – if any contamination is suspected, discovered, or occurs during the proposed SEPA action, testing for the potentially contaminated media will be conducted.

Water Quality/ Watershed Resources Unit

3. 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 storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Response: Noted – erosion control measures will be in place prior to any clearing, grading, or construction.

4. 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 173-20LA, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Response: Noted – there is no anticipated discharge of sediment-laden runoff or other pollutants anticipated with the proposed development.

Construction Stormwater General Permit:

5. The following construction activities require coverage under the Construction Stormwater General Permit:
    a. 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
    b. 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.
        i. 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
    c. Any size construction activity discharging stormwater to waters of the State that Ecology:
        i. Determines to be a significant contributor of pollutants to waters of the State of Washington.
        ii. Reasonably expects to cause a violation of any water quality standard.

Response: Noted – a construction stormwater general permit will be required and obtained for the proposed development. Construction stormwater will not be discharged to surface waters of the State for this project.

6. 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. For additional information on contaminated construction sites, please contact Evan Wood at evan.wood@ecy.wa.eov, or by phone at (360) 706-4599.

Response: Noted – if there are any known or discovered soil/groundwater

contaminants present on-site, additional information will be presented. There are no known contaminants for the site at this time.

7. Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition 58 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: https://fortress.wa.gov/ecv/waterqual itvatlas/StartPage.aspx

   Response: Noted – the site does not directly discharge to a waterbody listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act.

8. The applicant may apply online or obtain an application from Ecology's website at: http://www.ecv.wa.gov/programs/wo/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.

   Response: Noted – construction stormwater general permit application was obtained from Ecology's website and included within the SWPPP provided.

Olympic Region Clean Air Agency (ORCAA)

1. ORCAA regulations require an asbestos survey for all demolition projects. Demolition projects by definition also include renovations performed to load-bearing structural members on the current building as part of a remodel. Prior to any demolition project, the following must be completed:
   a. A good faith asbestos survey must be conducted on the structure by a certified Asbestos Hazardous Emergency Response Act (AHERA) building inspector;
   b. If asbestos is found during the survey, an ORCAA Asbestos Removal Notification must be completed and all asbestos containing material must be properly removed prior to the demolition; and,
   c. If the structure is 120 sq. ft. or greater, an ORCAA Demolition Notification must be submitted regardless of the results of the asbestos survey. There is a mandatory 1 4-day waiting period after ORCAA receives notification, so we recommend the applicant complete the Demolition Notification promptly after receiving the survey.

   Response: Noted – it is understood that an asbestos survey is required for all demolition projects.

If you have any questions or concerns with our responses in this letter, please contact me directly at (360) 634-2065 or email me at rjarvis@ldccorp.com

Respectfully
LDC, Inc

Ross Jarvis

Ross Jarvis, P.E.
Principal Engineer