



COUNTY COMMISSIONERS

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**COMMUNITY PLANNING &
ECONOMIC DEVELOPMENT DEPARTMENT**

Creating Solutions for Our Future

Joshua Cummings, Director

Docket Comments

This sheet is intended to summarize themes of comments received on the Beaver Creek land use and rezone request during docket comment periods. As of December 2023, the proposal has been revised in an effort to address some of the concerns heard from the community during docketing, so not all comments may still be reflective of the existing proposal.

- Docket Comments Received on Beaver Creek in 2021 – 7 support, 155 against
- Docket Comments Received on Beaver Creek in 2022 – 4 support, 16 against
- Docket Comments Received on Beaver Creek in 2023 – 5

Major themes:

- Delay request until more information is available from the countywide industrial lands study
- Concerns over zoning change related to habitat
- Concerns over zoning change related to hydrology
- Concerns over zoning change related to wildlife corridor
- Concerns of proposals consistency with GMA intent
- Support for proposal due to tax revenue, jobs, economic and social benefits

Unique ID	Date	Commenter Name	Type of Comment	Which Proposals?	Summary
1	2/26/2021	Esther Kronenberg	Against	Beaver Creek	I am opposed to the rezoning. A similar proposal was fought for years at Rocky Prairie and there are plans for a warehouse on Port property in Tumwater. The County just adopted the Climate Change Plan and one of its core components is to restore natural areas. I see no reason to re-open the docket. Business interested cannot continue to supercede the imperative to protect our natural resources.
3	2/28/2021	Victoria Blaze	Against	Beaver Creek	If the County's intent is to allow industrial activities under this proposal, why not just say no?
4	2/28/2021	Lynn Gudgel	Against	Beaver Creek EHO	These proposals should not be added to the dockets. If the county is considering accomodating homeless residences, why change to RRI?
5	3/1/2021	Sally Nole	Against	Beaver Creek	I have many issues with this amendment. There is no need to fast track this proposal. Second comment submitted on 3/16 stating please do not rezone, we have too many empty warehouses and need to be protecting farmland. This adds to climate change.
6	3/1/2021	Kristie Danzer	Support	Beaver Creek	This seems like a really good location for a warehouse, close to freeway, limited impact on residential areas. It's logical to place this type of business as close to the freeway as possible. Hopefully tax revenue would be very good.
7	3/1/2021	Margaret Hancock	Against	Beaver Creek	No more construction on 93rd and Maytown. You will be ruining the country, wildlife and making more of a mess on roads. More noise and crime.
8	3/1/2021	Jana Wiley	Against	Beaver Creek	What are the impacts of this proposal to the aquifer, Beaver Creek, traffic and air pollution? This latest propasal feels exactly like the other ones that TC residents have come out against and now it is burried with no public hearing scheduled.
10	3/1/2021	Josh Stottlemeyer	Against	Beaver Creek	<p>I strongly oppose the Beaver Creek proposal to convert rural residential land to industrial. The current industrial zoning in the Maytown area was wrong headed to start with. It's a rural community and industrial uses don't belong here. There are millions of unoccupied square feet of warehouse in Lacey.</p> <p>Exit 99 is being built up with other large projects causing traffic increase, which drives residents down to Maytown exit. If semi-trucks are added to that it'll be dangerous for commuters. Lacey warehousing traffic goes north so it doesn't have to drive through the County - putting a warehouse in South County will pull semi traffic through the entire county.</p> <p>Farmland is disappearing and converting 290 acres of it to industrial is in the wrong direction. Most of the jobs will be temporary jobs with no benefits, no vacation, rarely permanent. Most jobs are truck drivers that don't live here. Warehouses in Lacey are constantly seeking workers - we can't even fill these jobs.</p> <p>A project like this will be subject to massive public and environmental scrutiny and thousands of house of staff and commissioner time for a project that may ultimately be rejected. You saw the massive public outcry against the Rocky Prairie industrialization and that was just the docketing. The sample people will be affected by this projects and there's no reason to waste tax payer dollars docketing this project. Reject it now.</p>

11	3/1/2021	Jeff Pantier	Support	Beaver Creek	<p>Please accept this letter in support of the land use amendment for Beaver Creek Farm. If added to the docket, the proposal can be evaluated for a possible amendment to the County Comprehensive Plan. Currently, the site is used as a working dairy farm. It is located along the westerly and southerly portions of the site and the I-5/Maytown interchange and is located within 1/4 mile of the site, and also has railroad. It is adjacent to another Rural Resource Industrial zone, consistent with the proposed land use designation. A change of land use would provide added protections to Beaver Creek and the aquifer by eliminating the farm practices that can contribute to elevated nitrates. The industrial use can also provide positive impacts such as jobs.</p> <p>RCW 36.70A.365 provides criteria for which major industrial developments can occur outside of urban growth areas. With approval of the amendment to the docket, the applicant can work with County staff and stakeholders to evaluate the merits of this opportunity.</p>
12	3/2/2021	Madeline Bishop	Against	Beaver Creek	Please do not add to the docket, there is not enough staff time to complete and this de-prioritizes other items.
13	3/2/2021	Phyllis Farrel	Against	Beaver Creek	The Beaver Creek proposal should not be added to the docket. The docket is already full and would need to be reprioritized. Additionally this proposal would lead to a loss in ag lands, which we need to protect.
14	3/2/2021	Arvin Vander Veen	Support	Beaver Creek	I strongly support this amendment. There are cattle on the site now that contaminate the river, and if approved that would end. This project would also offer jobs and tax revenue to the County. There may be road improvements from the project that everyone could enjoy.
15	3/2/2021	Sharron Coontz	Against	Beaver Creek	<p>This shouldn't be proposed in between docket cycles. I've talked with the applicant and they stated there are no time constraints and they don't have to hurry this project along. I hope you will refuse to interrupt the docketing process for this - this will be a high interest project and require a lot of staff time.</p> <p>We're facing a serious issue of cumulative impacts in South County. There are already traffic issues at Exit 99 with the Pilot truck stop and a new commercial center warehouse going in. People moved to this area expecting and treasuring the rural character, including farm land, forests, prairies and wetlands. This project would bring thousands of daily truck trips to a sensitive area, destroy farmland and put rural character at stake.</p> <p>Sent follow up comment on 3/4 correcting previous comment regarding skipping the line. Noted still in objection to the rezone due to traffic, pollution, threat to Beaver Creek, loss of farmland.</p> <p>Sent follow up comment on 3/17/2021 with attachment. During the comment period for the new warehouse on 93rd in Tumwater, citizens realized the traffic projections were based on incomplete information, and therefore highly misleading and inaccurate. We hired an expert and his memo is attached. On the low end, there are estimated 1900 vehicle trips a day. On the high end, 7000 trips a day.</p>
16	3/3/2021	Lee Riner	Against	Beaver Creek	<p>Please do not allow Beaver Creek to circumvent the normal docketing process. Many other applicants wait their turn. It's not fair that this moves forward early. There is a creek that will be destroyed by stormwater, and also a huge warehouse being built at 93rd ave - do we need another one? These are huge buildings with lots of cars and trucks, we don't need to pave more farmland.</p>

17	3/3/2021	Janet Jordan	Against	Beaver Creek	Please do not rezone this request. The area is farmland and we need that, not only for food production but to capture carbon and help with climate change. The warehouse will cause runoff and impervious surfaces to one of the last salmon-bearing streams in the sound.
18	3/3/2021	Thomas Holz	Against	Beaver Creek	Please do not allow a private developer to circumvent the normal process. Also this is a salmon-bearing stream that would suffer from the project.
19	3/6/2021	Lori Beebe	Against	Beaver Creek	Myself and my husband are adamantly opposed to this proposal. Traffic is already on the rise, and semi truck traffic impedes the flow of traffic on Case and Littlerock roads. The proposed land change would have negative impact on traffic flow, rural life style, peace and prosperity. Industrial zoning is not environmentally sound and will have nothing but detrimental impacts on the creek.
20	3/6/2021	Sara Foster	Against	Beaver Creek	I am against the proposal.
21	3/5/2021	Jim Bennett	Support	Beaver Creek	Please review this letter in support of proposal. At this time, 40% of the current land in Thurston County is zoned 1/5. The cost of purchasing and developing land in Thurston County is very expensive. The need for more jobs and increased tax base would help the County. Changing the current farm to industrial should eliminate farm practices that contribute to elevated nitrates and soils in the water.
22	3/5/2021	Dan Goethals	Support	Beaver Creek	There are many advantages to this rezone, including new jobs and tax revenue.
23	3/5/2021	Will Webster	Support	Beaver Creek	Please support the amendment. South Thurston County has 0.04 percent of its land zoned as industrial and 40% zoned RRR 1/5. This job creates new, clean jobs and reduces nitrates. It'll provide over 200 acres of open space, increase the property taxes received by Thurston County, and reduce the number of cars on i-5. (Additional Comment) Our project is not part of Rocky Prairie and will not increase truck traffic in Rocky Prairie. This project will eliminate nitrates and reduce the number of cars going to Tacoma and Seattle each day, as well as provide tax revenue.
25	3/5/2021	Lorraine James	Against	Beaver Creek	Please do not consider this application to rezone the Maytown exist. This area is already a traffic nightmare and is environmentally sensitive. There is already plans for industrialization at exist 88.
26	3/8/2021	John and Susan D	Against	Beaver Creek	Rezoning this property would mean loss of valuable ag lands, increased stormwater, major earthmoving to flatten rolling hills of the property, traffic, lights and noise that are incompatible with the rural area. This is not compatible with the rural life and live-stock keeping of this area. We ask that you do not add this proposal to the docket.
27	3/7/2021	Sabine McDuff	Against	Beaver Creek	I am worried about all the industrialization. This causes traffic headaches, impacts the environment, and impacts rural character.
28	3/8/2021	Eric LaGasa	Against	Beaver Creek	Please do not approve. Extensive development is inconsistent with current and historic land use in this area.
29	3/4/2021	Deborah Watson	Against	Beaver Creek EHO	Please don't approve change at Maytown exit. I'm also against the Emergency Housing Ordinance. Submitted additional comment 3/19 stating no more big warehouses & protect farmland.

30	3/4/2021	Sarah Eygabroat	Against	Beaver Creek	My family has a small hobby farm on Beaver Creek Dr and the development/rezoning would be devastating to us. The more industrialized this area becomes, the more our quality of life diminishes. This change would cause a traffic nightmare, destroy the rural character, impact a sensitive, salmon-bearing stream, remove valuable farmland, is similar to a proposed warehouse at exit 99, and impact many county roads that would've been impacted by the NorthPoint project that was rejected by the BoCC after intense community involvement
31	3/9/2021	Joel Carlson	Against	Beaver Creek	Reject the Beaver Creek rezone for the following reasons: 1) the rezone is contrary to the no net loss goal, 2) the County does not need additional rural resource industrial land (as referenced in the draft 2021 Buildable Lands Report); 3) more details are needed on warehouse plans and there is no info on why this warehouse must be close to rural resources like forest, conservation, and agricultural activities; 4) rezone actions must not be "spot zoning"; 5) the Community Driven Review of Agricultural Policies and Practices should be the focus of staff and community efforts at this time, 5) Request revised documentation from the landowner to answer additional questions.
32	3/9/2021	Sharon Herting	Against	Beaver Creek	Please delay this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
33	3/9/2021	Phyllis Farrel	Against	Beaver Creek	Please delay this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
34	3/9/2021	Alice Flegel	Against	Beaver Creek	I am opposed to industrialization in rural South Thurston County. The proposed warehouse must not be approved. How will the creek be affected? How will wildlife be affected and protected? Traffic, noise and pollution are all other environmental concerns that would be detrimental to the area.
35	3/9/2021	E.J. Zita	Against	Beaver Creek	I recommend you do not place this request on the docket for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
36	3/10/2021	Paula Holroyde	Against	Beaver Creek	Please consider how this will impact groundwater quality and quantity. Second comment submitted in objection for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
37	3/11/2021	Kathleen Snyder	Against	Beaver Creek	I am opposed to the rezone. Will we need this with the technological changes coming? It makes more sense to keep the land open for carbon capture, agriculture, and recreation

38	3/11/2021	Amy Stottlemeyer	Against	Beaver Creek	I do not support the zoning change. Please oppose this change. People buy their land and look at the zoning to assure that they are buying in character keeping with the county. More warehouses and traffic will destroy the rural character.
39	3/12/2021	Lisa Ornstein	Against	Beaver Creek	Please do not add the Beaver Creek Rezone to the docket. This runs contrary to the No Net Loss goal. There are 300 acres of farmland on this property proposed for rezoning. If those are classified as Rural Resource Industrial (RRI), the land could no longer be farmed. The applicants responses are not sufficient and additional information should be requested.
40	3/11/2021	Mary O'Hara	Against	Beaver Creek	I am against this rezone. We do not want to lose our rural way of life to another warehouse that will generate traffic, chaos and destruction to the area. There is enough commercial development taking place just down the road at exit 99.
41	3/12/2021	Judy Konopaski	Against	Beaver Creek	I am opposed for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
42	3/12/2021	Paul and Sally Southworth	Against	Beaver Creek	The proposed rezone would ruin rural character. We own and live on a property partially adjacent to the 390 acres. In our 30 years of living here we have seen many salmon runs in the creek, as well as native fish, otters and beaver. Please consider the residents around this proposed zoning.
43	3/12/2021	Peggy Smith	Against	Beaver Creek	I do not want the Beaver Creek land use amendment to be added to the official docket. Having this proposal added to next years docket is a reasonable approach. It will allow the County to continue its efforts to protect farmland which will provide a stronger foundation for the consideration of the rezone request.
44	3/12/2021	Elizabeth Sanders	Against	Beaver Creek	I do not want this proposal to be added to the docket. 1) The County does not need additional Rural Resource Industrial land. 2) More details needed on Warehouse plans. 3) Rezone actions must not be spot zoning. 4) The Community-Driven Review of Agricultural Policies and Practices on the 20-21 docket should be the focus of staff and community efforts, and 5) Request revised documentation.
45	3/13/2021	Bob Clark	Against	Beaver Creek	Do not add the proposal to the docket: 1) The County does not need additional Rural Resource Industrial land. 2) More details needed on Warehouse plans. 3) Rezone actions must not be spot zoning. 4) The Community-Driven Review of Agricultural Policies and Practices on the 20-21 docket should be the focus of staff and community efforts, and 5) Request revised documentation.

46	3/14/2021	Christy White	Against	Beaver Creek	<p>I am opposed to this rezoning for the following reasons: 1) will have a significant impact on Beaver Creek, 2) pollution and toxic substances from a warehouse would add significant toxins to lands and waters connected to Beaver Creek, 3) Commissioners should step outside the box with tax credits to keep ag lands and a minimal environmental impact, 4) the cost is extensive and it will require at least 0.5 FTE, Thurston County doesn't need another warehouse, and 5) applicant requests to change zoning to RRI - what is so lacking in our current resources that could justify this warehouse?</p> <p>Second comment received Friday March 19: Opposed to rezone because 1) it'll have a significant impact on Beaver Creek, 2) The pollution and toxic substances from an industrial use will further contaminate water, 3) support ag with tax credits and other innovative techniques, 4) the cost of the rezone will be extensive, 5) What is lacking that could justify this rezone?</p>
47	3/12/2021	Michele Boderck	Against	Beaver Creek	<p>I am against the Beaver Creek proposal. We should protect our farmlands, no rezone them out of existence. Although a dairy farm may also impact a salmon-bearing stream, surely an industrial warehouse will not be an improvement. Many residents are already unhappy about the development happening on 93rd.</p>
48	3/15/2021	Jennifer Johnson	Against	Beaver Creek	<p>Please refuse the rezone to RRI. A large warehouse/distribution center would involve extensive impervious surfaces, lights, truck traffic, and noise that would interfere with the migration of wildlife. It could also impact Coho salmon with high waters and impacted water quality.</p>
49	3/15/2021	Lisa Ceazan	Against	Beaver Creek	<p>I am opposed to the proposal: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested. Please delay the Beaver Creek proposal to 2022.</p>
50	3/15/2021	TJ Johnson, Thurston Conservation District	Against	Beaver Creek	<p>I strongly suggest you do not add Beaver Creek to the 2021 planning docket. We believe the request is problematic for the following reasons: 1) converting the parcel to a non-agricultural use is inconsistent with the county-wide goal of no net loss of farmland; 2) it would be premature to consider this rezoning while the community driven review of agriculture docket item is under way; 3) the County does not need additional Rural Resource Industrial land; 4) the underlying zoning does not offer assurance that the land will remain in agriculture and although RRI would ensure it isn't developed at residential densities, it would almost certainly preclude ongoing agricultural activities on the property.</p>
51	3/15/2021	Gerald Cichlar	Against	Beaver Creek	<p>I am opposed to the proposal: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.</p>
52	3/15/2021	Lynne Holz	Against	Beaver Creek	<p>Please do not rezone Beaver Creek. It would be a shame to lose a beautiful natural setting and impact the wildlife corridor.</p>
53	3/16/2021	Philip Pearson	Against	Beaver Creek	<p>Please do not rezone Beaver Creek and allow more warehouses. The farmland is too valuable.</p>

54	3/16/2021	Betty Fugazi	Against	Beaver Creek	I object to this rezone. This developer should go to other areas on the i-5 corridor to build. Building here will affect wildlife, water flow, and the environment.
55	3/16/2021	Tali Waterman	Against	Beaver Creek	I ask the BoCC refuse this rezoning application. My hope is the that the area continue to receive protection from the Growth Management Act, and that the current wildlife corridors be protected from industrial development.
56	3/15/2021	Karol Erickson	Against	Beaver Creek	Please reject the Beaver Creek rezone. This item should not be moved ahead of items already on the docket. The property is working farmland and should be preserved, and is also an unofficial wildlife corridor. Lights, truck traffic, and noise would dramatically interfere with the environment. Beaver creek is also an aquifer recharge area with Coho salmon. Toxic runoff could cause water quality degradation.
57	3/15/2021	Marlene Westhoff	Against	Beaver Creek	Please do not add the Beaver Creek Rezone to the docket for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
58	3/15/2021	Patty May	Against	Beaver Creek	Please do not add this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
59	3/15/2021	Cindy Fairbrook	Against	Beaver Creek	Please consider rejection of the Beaver Creek application. This change would remove valuable farmland and there are concerns over the wildlife corridor.
60	3/15/2021	Ann Hawkins	Against	Beaver Creek	Please do not add this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
61	3/15/2021	Michele Burton	Against	Beaver Creek	I am in opposition to the Beaver Creek rezone. This area is vital to the environment and is a transition between forest and prairie, as well as home to many imperiled species including the Bluebird, Taylors Checkerspot butterfly, and Oregon spotted frog. Traffic will degrade the environment and put animals in peril. Also this would convert agricultural lands to industrial. Ag lands are rapidly decreasing and should be protected, not converted.
62	3/15/2021	Greg Bragmann	Against	Beaver Creek	I am writing to request that the BoCC reject the proposal. The farm is in one of the most rural areas of the County, and the rezone could affect the quality of life in the area with increased traffic, increased noise, and potential impact on water quality.
63	3/15/2021	David Mudd	Against	Beaver Creek	Please reject this proposal. We need to protect farmland, open space, and wildlife habitat. We do not need to build another warehouse on the small amount of farmland we have.
64	3/15/2021	Jeanne Miller	Against	Beaver Creek	Farmland and open land for wildlife is too precious to be paved over. I ask that you please reject the rezone application.

65	3/15/2021	Jeff Sowers	Against	Beaver Creek	Please do not add this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
66	3/16/2021	Valerie Hammett	Against	Beaver Creek	Please do not rush zoning changes converting farmland.
67	3/16/2021	Shari Silverman	Against	Beaver Creek	Please do not add this item to the docket and defer to 2022. The Community Review of Agricultural Policies and Practices should be completed before this rezone is considered.
68	3/16/2021	Sue Rudisill	Against	Beaver Creek	I ask the Commissioner's reject the Beaver Creek rezone. This would permanently remove valuable farmland from agricultural use. It would negatively impact the only wildlife corridor under I-5 and Beaver Creek. The Commissioner's should prioritize ecosystems over warehouses.
69	3/16/2021	Linden Bentley	Against	Beaver Creek	I am opposed to the Beaver Creek rezone. Conservation Northwest, the non-profit that developed the Snoqualmie I-5 wildlife corridor, believes that the area between milepost 93 and milepost 98 is a valuable wildlife corridor, with the area at exit 95 under I-5 an important crossing location. Thousands of acres have been conserved along or near the Black River Refuge (Mima Mounds, Glacier Heritage, Black River National Wildlife Refuge) and Millersylvania is to the east.
70	3/16/2021	Judy Olmstead	Against	Beaver Creek	I urge the Commissioners to reject the rezone application for Beaver Creek Dairy Farm. Working farmland is important to our community, and the wildlife corridor under I-5 would be negatively affected.
71	3/16/2021	Nancy Peterson	Against	Beaver Creek	Please do not add this item for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
72	3/16/2021	Elizabeth Raybur	Against	Beaver Creek	Please refuse the rezoning.
73	3/16/2021	Jennifer Garlesky	Against	Beaver Creek	I write you to encourage you delay changing the docket. One of the biggest concerns I have is impact on our farmlands. There also needs to be more review on plans of the warehouse facility, and an impact statement to the surrounding region.
74	3/16/2021	Kathy Haviland	Against	Beaver Creek	I am opposed to this rezone application. I support the Board doing everything possible to preserve working farmland, and the protect the wildlife corridor under I-5.
75	3/16/2021	Victoria Legg	Against	Beaver Creek	Please deny the rezone application. It will demolish a wildlife corridor, and losing farmland endangers us as climate change continues to be a challenge.
76	3/16/2021	Lori Doron	Against	Beaver Creek	I am in opposition to the proposed rezone. The property is valuable working farmland, protected under GMA for good reason. Beaver Creek is an aquifer recharge area with coho salmon. Precedent for more warehouses when there are 3 in Lacey with two more planned sets a precedent for developing from Capitol Highway to Grand Mound and would be in the heart of the conserved lands in Thurston County.

77	3/16/2021	Kyle Leader	Against	Beaver Creek	I ask that you reject the rezoning. By rejecting it you will preserve farmland and wildlife that depends on that habitat.
78	3/17/2021	Kristin Blalack	Against	Beaver Creek	Delay the Beaver Creek rezone. County staff have a full schedule to review agricultral policies and practices - this is high priority. Please do not change the docket for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practicies should be the focus of staff efforts, and 5) Revised documents should be requested.
79	3/17/2021	Deb Petersen	Against	Beaver Creek	Please do not allow this rezone. It will result in loss of farmland, habitat, rural areas, and turn the county into a congested, polluted and ugly area.
80	3/17/2021	Patricia Creighton	Against	Beaver Creek	I appreciate Sue Danver's views expressed in The Olympian on 3/17. I've been here since 1970 and rural areas are built out. Development should be possible while retaining farmland and protecting water quality.
81	3/17/2021	Larry Remmers	Against	Beaver Creek	Don't do it. My neighbors and I want to keep south county rural, not covered with warehouses. This will impact the environment, atmosphere, and animals.
82	3/17/2021	Tony Aitken	Against	Beaver Creek	No warehouse at exit 95.
83	3/17/2021	Kelsea Jewell	Against	Beaver Creek	I was born in Delphi Valley and live just outside of Rochester, so I travel the area and interact with folks frequently. There have been massive warehouse changes in Centralia resulting in loss of flood buffers, wildlife, and heavy truck traffid. Beaver Creek is important to our region as farming land. Converting it to asphalt will increase flood risks and decrease the usefulness of the land. Please preserve local farmland.
84	3/17/2021	Rembrandt Haft	Against	Beaver Creek	I recommend the Board delay and reconsider the proposal. One of the reasons my wife and I chose Thurston County was for the vibrant agricultural nature. Productive farmland is a critical resource. Please help protect the farmland that feeds us.
85	3/17/2021	Jeanne DeMille	Against	Beaver Creek	Please reject this rezone. This is not what we want.
86	3/17/2021	Lee Ayn Dyer	Against	Beaver Creek	Please do not rezone Beaver Creek. This action would damage the environment, compromise wildlife, and degrade the public experience at Millersylvania.
87	3/17/2021	Carole and Ron Wahlers	Against	Beaver Creek	I protest this rezone. It will cause wildlife carnage, is environmentally a bad idea, and paves over farmland. Please vote no.
88	3/17/2021	Barbara Gross	Against	Beaver Creek	I am writing to ask you vote no to the rezone. Industrial development will create more impervious ground cover, more light and noise pollution, more traffic, and will decrease the quality of life for both human and wildlife living in that area. Our wildlife depends on contiguous forested land and salmon need that water to survive. Financial analysis doesn't work for the betterment of all, only of a few.

89	3/17/2021	Blaine Snow	Against	Beaver Creek	I am writing to ask you vote no to the rezone. Please maintain habitat for our wildlife and salmon.
90	3/17/2021	Roxanne Cherry	Against	Beaver Creek	I ask you reject the rezoning application.
91	3/17/2021	Beth Sutch	Against	Beaver Creek	I am in opposition to the rezone. I want our rural area to have a character more like Skagit than like Kent, and I want our rural lands to be a haven for wildlife and natural environment alongside farmland.
92	3/17/2021	Lynn Bassett	Against	Beaver Creek	Please do not change the docket for the following reasons: 1) the county doesn't need additional industrial lands, 2) more details are needed on warehouse plans, 3) rezone actions shouldn't be spot zoning, 4) the Community-Driven Review of Agricultural Policies and Practices should be the focus of staff efforts, and 5) Revised documents should be requested.
93	3/17/2021	Sandy Halstrom	Against	Beaver Creek	I am against this rezone. We can't keep chipping away at nature and still have it function correctly. Warehouses cover land, create traffic and pollution, and create jobs that don't pay a livable wage or provide benefits for our community.
94	3/18/2021	Roger Yetter	Against	Beaver Creek	Please say no to the rezone. Save our farmland and clean waters.
95	3/18/2021	Ryan O'Brien	Against	Beaver Creek	I do not want rezoning to allow for an industrial area. The reason I moved here was to enjoy nature in a rural area.
96	3/18/2021	Doug Buster	Against	Beaver Creek	I urge the rejection of this rezone application. It is important to preserve farmland, and the proposed change would allow large amounts of impervious surfaces, degrade the surrounding areas integrity as an aquifer recharge area. The wildlife corridor along Beaver Creek is important and rare. Please help maintain the quality of life for humans, wildlife and salmon.
97	3/18/2021	Tom Terry	Against	Beaver Creek	This rezone could have a major negative impact on Beaver Creek, a Coho salmon bearing stream. Coho show dramatic declines due to habitat loss, roadway pollutants, and other factors. This is also one of the few areas where wildlife can pass under I-5 without being exposed to high levels of traffic. As soon as one area gets rezoned, the parcels next to it will also become industrial.
98	3/18/2021	Frank and Carol S	Against	Beaver Creek	We are disappointed to hear about this rezone. We live on the hill surrounded by this property, bought 8.5 acres in 1994 and built our dream home in 2002. We put a lot of work into it and are good stewards of the land. We built here knowing there were other properties zoned industrial but felt protected since the dairy farm is rural residential one to five. We are concerned rezoning the land will change the wildlife, ecosystem, wetlands, and may impact our property values. Beaver creek will also be affected by diesel and other pollutants and impact our wells and water supply. The increase in traffic will cause more problems.

99	3/18/2021	Brian Stewart, Conservation Northwest	Against	Beaver Creek	<p>These comments are in opposition to the proposed land use change at Beaver Creek. CNW is a non-profit environmental group with a mission to protect, connect, and restore wildlands and wildlife. We focus on recovering native species and ensure they have ample habitat in the right locations to thrive.</p> <p>I-5 is a major fracture point and barrier for wildlife and ecological processes, made worse due to development along its corridor. There are 3 remaining corridors identifies, and one of those is a network of small corridors from the Grand Mound exit to milepost 99. The Beaver Creek I-5 intersection has the potential to be part of a larger linkage that facilitates natural processes and wildlife movement.</p> <p>We also encourage the county to consider how few options is has for climate change adaptation. When animals do not have connected habitat, they are unlikely to be successful adapting to a changing climate.</p> <p>This type of rezone would change the character of the entire community, and will hurt Thurston County's shrinking rural communities.</p>
100	3/18/2021	Jean Maust	Against	Beaver Creek	I urge the County Commission to deny the Beaver Creek Dairy Farm rezoning, which would reduce farmland in the County. This area provides wildlife habitat and also farmland critical for the health and vitality of our region.
101	3/18/2021	Peter Bunce	Against	Beaver Creek	I strongly oppose the Beaver Creek proposal. It will have an irreversible impact on wildlife. I urge the County to not add it to the docket.
102	3/18/2021	Melvin Stanley	Against	Beaver Creek	I agree with Sue Danver's letter to the editor in the March 17 edition of The Olympian. I urge the Commissioner's to say no to this rezone request. It will destroy wildlife habitat and farmland.

103	3/18/2021	Helen Wheatley	Against	Beaver Creek	<p>I am in opposition to placing this item on the docket. The application is incomplete and inaccurate. If a question is left blank, as was done here, an application should be rejected. I not only oppose this being added to the docket, but I oppose the Master Application as it is currently written. It is inequitable to be expected to weigh in on an application that is incomplete and inaccurate.</p> <p>Rezoning for a warehouse would set a precedent that would change rural land use near I-5. The applicant asks the Commissioners whether large-scale warehouse/distribution should be considered a preferred use of a rural parcel simply because it is located by a freeway and rail line. The freeway passes through rural lands for which the state and county has already set goals for based on GMA. Adding a warehouse will imply that a freeway trumps the local context of rural character. If the County has grounds to believe that a warehouse located in a rural area by a freeway ramp provides greater benefits than a warehouse in an appropriately zoned UGA, then Commissioners should take the step of proposing a revision to the comprehensive plan.</p> <p>The request fails to address the goals of the Growth Management Act as required. If the applicant can't make a case for zoning, all other bets are off. The most important of those are Planning Goal 8 (Natural Resource Industries), Planning Goal 1 (Urban Growth), and Planning Goal 10 (Environment).</p> <p>Conversion of the property to RRI would be a loss of farmland, this goals against the goals of GMA. RCW 36.70A.020 does not apply as they claimed.</p> <p>The applicant claims no suitable parcels are available within the UGA but offers no data to back it up. The (draft) 2021 Buildable Lands Report supports the fact that commercial and industrial property is available in Thurston UGAs to accommodate growth. The applicant also claims that Industrial Use are Permitted in Rural Areas. The applicant is correct that land for industrial use can be located in rural areas. But RRI zoning is not the equivalent of urban industrial zoning. Based on the proposed use, the Urban Growth question demands justification for rezoning from a rural use to an urban industrial use.</p> <p>RCW 36.70A.365 does not allow industrial development outside of urban growth areas, but does allow counties to develop a process in consultation with the cities. If the County has an established process under 36.70A.365, then the application should answer on the basis of its requirements. The application should be based on the requirements under 36.70A.365. They also do not explain the potential impact a major industrial development would have on rural public facilities and services.</p> <p>Also, several of the parcels lie outside of the half mile limit to I-5 so those parcels fall out of the RRI locational criteria.</p>
104	3/18/2021	Bonnie Wood	Against	Beaver Creek	<p>I urge you not to rezone Beaver Creek Dairy farm. South Sound prairie ecosystem is precious and priceless. All of these would be irreparably harmed by a large warehouse campus</p>
105	3/18/2021	Elizabeth Clarke	Against	Beaver Creek	<p>I ask you not to approve. Beaver Creek runs through it with salmon, beaver, a rural town, groups of bicycles. What will this do to property values and quality of life?</p>
106	3/18/2021	Sherry Buckner	Against	Beaver Creek	<p>I am saddened to hear that the owners are interested in rezoning to industrial. This location is high quality land with wildlife corridors and salmon. I ask that it be denied, it serves no one but the person who sales it.</p>
107	3/18/2021	Joan Quigley	Against	Beaver Creek	<p>I am against the zoning change proposal. There is a lot of development in this part of the County already. Stop this parcel of farm from being covered in asphalt.</p>
108	3/18/2021	Joshua Martin	Against	Beaver Creek	<p>I strongly object to the industrialization of this area. My wife and I purchased off of Case Rd for several reasons, including rural community, rural agriculture and lack of traffic. A warehouse in this area would devastate the community and environment. The roads are not built for this traffic and already struggle with the Freightliner facility. Additionally, the impervious surface would jeopardize the fish-bearing creek adjacent to the property. Thurston County completed a Fish Barrier Removal project just south of case road. Adding a warehouse would channel more pollution into the creek. As it is being used as agriculture, rainwater can swiftly and easily penetrate the top soil, but replacing that will impact the water. Industrial expansion is already planned at Exit 99. Thurston County does not need to expand industrialization south.</p>

109	3/18/2021	Diane Smith	Against	Beaver Creek	I request the Commissioners remove this from further consideration. My land shares the north and western boundary lines with the dairy farm. When I bought in 2003, I understood the zoning and agricultural use, including smells from the dairy farm. No buffer exists that will prevent a warehouse facility from being front and center to my views of the Black Hills. My water is supplied by my own well and this could degrade it. Traffic will be unsafe
110	3/18/2021	Noll Steinweg, WDFW	Against	Beaver Creek	The Beaver Creek watershed supports several species of particular interest to WDFW. The Oregon Spotted Frog and Olympic mudminnow are both documented near the subject property. Additionally, a large portion of the property is Designated Federal Critical Habitat for Oregon Spotted Frog. From a desk review, the subject property appears to contain off-channel habitat of Beaver Creek and emergent wetlands, which may support Oregon Spotted Frog and Olympic mudminnow. Agricultural management may also support OSF. Development of the site risks impacting it through loss of agricultural practices such as grazing. Due to the proximity of these species and their habitats to the proposed industrial park and to align with the Growth Management Act goals of RCW 36.70A.020, WDFW recommends the subject property retain its current zoning designation. If the proposal moves forward, WDFW recommends a habitat assessment and management plan be completed to evaluate and address any other potential impacts.
111	3/18/2021	Rebecca Turner	Against	Beaver Creek	I do not support this change. This is rural farmland and family housing. A warehouse would not be good for salmon.
112	3/18/2021	John McClung	Against	Beaver Creek	Please do not add this item to the docket. This change would allow an intrusive commercial project at exit 95. Truck traffic would disrupt the area and it could pose a threat to salmon in Beaver Creek. Recent commercial development at exit 99 has made getting on and off extremely difficult, this would do the same to exit 95.
113	3/18/2021	D Roylance	Against	Beaver Creek	Rezoning this property would set a precedent for I-5 to become a warehouse alley, destroy rural and conservation lands and compromise the area with pollution. Protect clean drinking water.
114	3/18/2021	Linda Nielsen	Against	Beaver Creek	Please do not let this section of land be rezoned and sold to build another larger warehouse center. It is also a wildlife corridor. I am opposed to this.
115	3/18/2021	Charles and Beverly Heebner	Against	Beaver Creek	We agree with the BHAS position and are opposed to the rezone.
116	3/18/2021	Peggy Clifford	Against	Beaver Creek	Please consider comments on this proposal. We are in danger of losing salmon and this property includes important salmon habitat.
117	3/18/2021	Ryan Bedford	Against	Beaver Creek	I disagree with the proposal. This exit is not conducive to truck traffic. If anything, the Grand Mound area would be a better location because of the geography and infrastructure that has already been improved.

118	3/18/2021	Doug & Lillian Ryan	Against	Beaver Creek	Please protect rural Thurston County and reject this proposal. This piece of land is fragile with important habitat for coho, chinook and steelhead. Allowing industrial development will introduce runoff and potential for chemical spills
119	3/18/2021	Barbara Carey	Against	Beaver Creek	I ask you to refuse the rezone. As a retired hydrogeologist, I am familiar with the detailed 2002 Dept of Ecology groundwater study at the site. This is a aquifer recharge area and impervious construction would restrict flow of water into the aquifer and into Beaver Creek. The stream substantially depends on groundwater inputs. This rezone is contrary to county environmental protection aims.
120	3/18/2021	Paul Bakke	Against	Beaver Creek	I ask you reject the rezone. This change would negate 30 years of coordinated science based conservation and protection actions dedicated to recover Chehalis Watershed salmon stocks. There is really no way to mitigate for degradation in a way that offsets habitat destruction. A large warehouse would alter hydrology, stream flow, and ground and surface water relationships. Stormwater mitigation may reduce the impact but cannot reestablish a natural stream discharge pattern. This impacts salmon spawning as eggs become more susceptible to scour or burial. Water quality and temperature is also impacted and can cause extreme stress to salmon. Zoning isn't just about preserving rural character and lifestyle, but also to preserve amenities to the public and public resources, such as fish and water quality.
121	3/18/2021	Loretta Seppanen	Against	Beaver Creek	I ask that this rezone be considered for the 2022 docket, not the current docket. This proposal is contrary to the goal of no net loss of farmland, it would take staff time away from the Community Driven Review of Agricultural Policies and Practices docket item, and as written, the proposal fails to meet the standard for the good community planning. Additionally, the County does not need more industrial lands, spot zoning is not good planning, and the request is not ready for decision-making,
122	3/18/2021	Martha Rosemeyer	Against	Beaver Creek	Please do not place this request on the docket. Please either remove the request all together, or reconsider it in 2022. This would remove 300 acres of farmland. Currently the County loses 3,000 acres of farmland per year. The Community Driven ag review on the docket should be prioritized.
123	3/18/2021	Ed & Susan Cogan	Against	Beaver Creek	Please vote no. This would pollute and congest our roads.
124	3/19/2021	Meryl Bernstein	Against	Beaver Creek	Please put an end to the increasing number of applications that seek to encroach upon what remains rural non-industrial lands along Thurston's I-5 corridor. Exit 99 will soon be build up, those developments will drive out 2 family owned campgrounds. Traffic has been a nightmare with those developments. Many residents commute using Exit 95 and 99. Incremental development is moving at a fast pace. Industrializing both exists is a surefire way to turn rural south Thurston into nondescript communities like from Tumwater to Bellingham. Maytown is one of the last remaining S Thurston exits with a corridor under I-5 for large mammal movement. Wetlands are extensive, and this is just a few miles from WDFWs large prairie reserve.
125	3/19/2021	Christine Hemplemann	Against	Beaver Creek	I ask you deny the request for the following reasons: Beaver Creek is salmon bearing and in an aquifer recharge area; it's within a wildlife corridor; conversion of those 300 acres is contrary to the stated No Net Loss farmland goal; the draft 2021 buildable lands report identifies capacity for industrial development in the UGAs even when projected out 20 years.
126	3/19/2021	Rebecca Potasnik	Against	Beaver Creek	Consideration of this request should not be a priority this year. The County is rapidly losing farmland, and should focus on the community driven review of agricultural policies and practices.

127	3/19/2021	Rebecca Turner	Against	Beaver Creek	Please don't docket this item. It would allow intrusive commercial development and could pose a threat to salmon in Beaver Creek.
128	3/19/2021	Felix Mahr	Against	Beaver Creek	I have done wetland studies on and near the proposed rezone. There are numerous wetlands, seeps and streams in this area which need to be protected. If the applicant has not already done a site-specific study to document all critical areas on site, I recommend the rezone be deferred until these are complete.
129	3/19/2021	Dale Armstrong	Against	Beaver Creek	I am opposed to this proposed and ask the Commissioners refuse the rezone application. The property is valuable working farmland. Also this threatens a wildlife corridor and aguifer.
130	3/19/2021	Bill Yake	Against	Beaver Creek	I ask you decline the Beaver Creek rezone.A 2002 study by Dept of Ecology was conducted at the site and stated that stream discharge depends substantially on groundwater inputs. Impervious surfaces will restrict and contaminate flow of water into the aquifer.
131	3/19/2021	Virginia McCabe	Against	Beaver Creek	Please deny the rezone request. We are losing ag land. Industrial interests are not compatible with clean water and a safe environment for native species.
132	3/19/2021	Jake Yancey	Against	Beaver Creek	<p>I oppose the rezone as it hinders the future of agriculture and would convert almost 400 acres of historical agriculture. I am a first generation cattle rancher. Grazing responsibly makes use of the gorund when it may not be suitable for crop production. Chris Doelman spoke so well in a 2018 interview, "I strongly agree in playing the Infinite game, not the Finite game". Chris recently commented at the Ag Committee meeting on 3-18-21 that the Dairy Farm is not sustainable and suggested that the Ag Committee should be interested in taking care of the farmer. When asked if Chris had listed it for sale, placed on public farmer-matching sites, or spoke with Conservation groups, Chris said "No I have not". When asked if Chris was interested in a farmer using part of his property for agriculture, he stated no. He stated he would only sell his property for "fair market value". Additionally Doelman Dairy used to own property near Black Hills High School. It is now slated for conversion to 1500 homes.</p> <p>I implore the Commissioners to postpone or deny the rezone. Help to preserve what agricultural land remains.</p>
133	3/19/2021	Alex Foster	Against	Beaver Creek	I stroungly suggest this not be added to the docket. This conflicts with the ag item under review currently. I understand a farm is a business, but in rezoning agriculture to other uses the environment should be a consideration on par with economics. This site is critical habitat for Oregon Spotted Frog along Beaver Creek. By delaying the rezone to 2022, a conservation easement or acquisition by land trust could preserve a portion of the property.
134	3/19/2021	Greg Sorlie, Gale Blomstrom	Against	Beaver Creek	I ask you not to approve this rezone. It is a salmon creek and a warehouse would restrict water flow into the creek.

135	3/19/2021	David and Katherine Seiler	Against	Beaver Creek	<p>(Daivd) I urge you to reject this request. Development of this property will have a permanent effect on salmon production in Beaver Creek. I am a retired salmon scientist who for 30 years led the WDFW Wild Salmon Production and Survival Evaluation Program. Salmon production is a function of stream health - degradation of habitat can take many forms, siltation, warming, loss of shade, altered stream flows.</p> <p>(Katherine) I have concerns about the runoff impact on salmon smolts and adults. In my 30 years in Department of Ecology Hazardous Waste Program, I dealt with effects of toxics on the natural system. Studies show tire chemicals can be toxic to salmon. Truck traffic would impact the rural area and change the character. Coho are important tribal fisheries in the Chehalis and Grays Harbor. The Washington Coast Sustainable Salmon Plan states that commercial development is a critical threat to salmon in the Chehalis River Basin.</p>
136	3/19/2021	Linda Remmers	Against	Beaver Creek	This proposal will degrade environmental quality and rural character, and traffic issues will be significant.
137	3/19/2021	Cindy Wills	Against	Beaver Creek	I urge the Commissioners to reject the zoning change request. I agree with Dave and Kay Seilers arguments. I am also concerned about the loss of habitat and impact of night lighting.
138	3/19/2021	Larry Goldstein	Against	Beaver Creek	I ask you deny the application. This change would create acres of impervious development, restricting aquifer recharge; diminish water quality and quantity in Beaver Creek; and increase the likelihood of chemical contamination of both ground and surface water.
139	3/19/2021	Marilyn Miller	Against	Beaver Creek	I am opposed to the rezoning.
140	3/19/2021	Margaret Green	Against	Beaver Creek	This change would be a terrible mistake. We would lose habitat, wildlife, green space for carbon storage, potential farmland, and have the added negative impacts of traffic, diesel pollution, noise, and landscape change.
141	3/19/2021	Nathanial Jones	Against	Beaver Creek	This proposal should not be included in 2021. The docket is full and prioritizing a new proposal of this magnitude is not appropriate. Further, the proposed reason would be counter to stated goals for the County's farmland preservation, fails to recognize the character of the area, and would likely be ruled as spot zoning. For these reasons the proposal would likely fail and should be withdrawn altogether.
142	3/19/2021	Gordon White	Against	Beaver Creek	There are several issues making it inappropriate to change the current zoning and designation. Lack of need - there is no need for the intended use. The 2021 Buildable Lands Report finds there is sufficient land zoned in urban areas to support this type of use for 20 years. Just north, a warehouse is going in of over 1 million square feet. It is also a threat to salmon and drinking water.
143	3/19/2021	Jennifer Lyne	Against	Beaver Creek	I oppose the rezoning of the area. If that's not possible, I urge the Board to reconsider in 2022 with accurate and up to date information.

144	3/19/2021	Heather Saunders	Against	Beaver Creek	I am asking you to refuse the rezone for Beaver Creek. I retired from Thurston County Health Department in 2019 and have monitored Beaver Creek many times. This creek is heavily dependent on recharge from ground water, particularly in the summer. Impervious surfaces will impact the creek a lot. If pervious pavement is used, water quality will be impaired. I encourage the Board to find places where these types of development are appropriate (tight clay or silt layers). Used in combination with engineering solutions, they decrease potential damage. Clean up is expensive and usually the taxpayer ends up picking up the bill.
145	3/19/2021	Mary-Taylor Goforth	Against	Beaver Creek	I ask that this not be added to the docket this year or next. This is contrary to the County's no net loss of farmland goal. Farmland is extremely valuable to the community's climate crisis resilience and food security.
146	3/19/2021	Jean MacGregor	Against	Beaver Creek	I am opposed to the rezone for the following reasons: the property is rural farmland protected under GMA; the property is part of a valuable corridor for wildlife; this property contains valuable wetlands.
147	3/19/2021	Andy, Clara, and Lawrence Jacobson	Against	Beaver Creek	I am writing to oppose the rezone. This would be a violation of GMA. These laws were put in to place to stop urban sprawl and preserve rural areas.
148	3/19/2021	Robert Cole	Against	Beaver Creek	I am opposed to the rezoning of Beaver Creek. This is currently rural farmland. Wildlife including salmon in Beaver Creek will be harmed by the needless development. This area is also important for groundwater recharge.
149	3/19/2021	Tony Wilson	Support	Beaver Creek	I am in support of this proposal. I believe the landowners of this parcel are making a legally supportable request. They no longer make a living operating the dairy site and wish to sell it for another purpose, one keeping within its "highest and best use". As I understand, they have been unable to sell their property at an acceptable price to another farmer and dairy farming has ceased and is unprofitable. Residential within the current zoning is unlikely. The site also seems unsuitable for land trust protection as it is not adjacent to a major waterway. RRI was put into the code in 1998 with a purpose to protect rural nature of county while still allowing for normal growth. This site is also contiguous with more RRI. If docketed, the opportunity then exists for the state, DFW, Dept of Ecology, tribe, and other stakeholders to contribute to the conversations.
150	3/19/2021	Paul Stasch	Against	Beaver Creek	I am opposed to the rezoning. This development would permanently alter the rural agricultural environment of south Thurston County and promote urban sprawl. It will also have a massive adverse impact on healthy salmon at Beaver Creek. Millions of dollars were spent last fall to replace a fish blocking culvert a short distance from the site.
151	3/19/2021	Tom Burns	Against	Beaver Creek	Please vote no on the proposed rezone. This property is part of an important wildlife corridor. Beaver Creek is one of the most highly productive wild coho streams in the entire Chehalis Basin. And rezoning this site would impact the aquifer recharge area.
152	3/19/2021	Robert and Susan Market	Against	Beaver Creek	Please reject this application. It poses many serious environmental threats to drinking water, habitat degradation, and incompatibility with neighboring properties. We urge you to focus on the current docket items, including the Community Driven Review of Agricultural Policies and Practices.

153	3/19/2021	Barb and Reed Tindall	Against	Beaver Creek	Do not vote for the proposed rezone. Protect farm and the salmon run in Beaver Creek. Request the hydrology study of Beaver Creek, done by Denis Erickson of Dept of Ecology.
154	3/19/2021	Nancy Riordan	Against	Beaver Creek	Please do not support the rezone. It would permnantly change the landscape. Beaver creek warrants protection.
155	3/19/2021	Loree Milne	Against	Beaver Creek	Please vote no on the rezone. We need more green land and farming than warehouses. Exit 99 is already a mess with traffic and the new warehouse development.
156	3/19/2021	Betsy Dicks	Against	Beaver Creek	I ask you to refuse the rezone. I am retired from Washington Dept of Ecology as a water quality specialist and this site is an aquifer recharge area. Impervious surfaces would restrict the flow of water into the aquifer and impact it in the summer. This could cause substantial deterioration of habitat for salmon and wildlife.
157	3/19/2021	Sam Merrill and Sue Danver, Black Hills Audubon and Jim Mathieu of NW Land and Water	Against	Beaver Creek	<p>We ask you deny the request to change the zoning. This decision will impact the future character of the County. BHAS expects this to take at least .5 FTE and would most likely lead to approval with followed approval for construction; therefore the docket decision is cruz to this process. The health of Beaver Creek, its riparian corridor, surrounding wetlands and habitat would be in jeopardy with industrialization. This area is home to coho slamon, Oregon Spotted Frog and is federally designated Critical Habitat for Oregon Spotted Frog. Please see the accompanying report from NW Land and Water hydrogeology consultant for BHAS.</p> <p>(memo from NW Land and Water) - the proposed rezone is incompatible with the high-value hydrological and ecological assets on, adjacent to, and downstream of Beaver Creek. Development would significantly increase stormwater runoff, threaten the quality of a sole-source drinking water aquifer, harm habitat for salmon and frogs, and increase potential flooding to downstream properties.</p>
158	3/19/2021	Donna Snow	Against	Beaver Creek	I urge you to vote no. There is an unofficial wildlife corridor that runs from Capitol Forest under I-5 at Beaver Creek to West Rocky Prairie, and allows animals to have safe passage. Coho Salmon migrate through the property to spawn in the creeks of West Rocky Prairie. Any large warehouse would have extensive impervious surfaces and parkings lots, lights, truck traffic, and noise.
159	3/19/2021	Tracy Lamie	Against	Beaver Creek	I am against the rezone. There is absolutely no need for a warehouse at this exit. It will negatively impact and affect many of the same County roads and neighborhoods as would have been impacted by Northpoint. The County roads are not quipped to handle heavy truck taffic and congestion compared to more urbanized areas in Northern Thurston County and large counties. Rocky Prairie is a rare natural prairie that is habitat to many sensitive and endangered species. Do not allow this change.
160	3/19/2021	Jim and Karen Armstrong	Against	Beaver Creek	We are in opposition of the land use change. The Comprehensive Plan states that rural areas are characterized by a balance between the natural environment and human uses with low density... and that commercial uses be small in scale to provide for the rural neighborhood. Industrial uses will generally be those dependent on natural resources. Traffic and congestion would undoubtedly increase. Please do not add to the docket and keep the existing zoning as 1 to 5.

161	3/19/2021	Rob Lamie	Against	Beaver Creek	There is absolutely no justification for a warehouse here. Studies show fulfillment centers have the highest impact on local traffic. Do not allow the continued assault on our rural lands. Rocky Prairie is rare natural prairie home to many endangered and sensitive species. Kepp it in its current rural zoning. The point of this is to keep lands in their natural state and reduce urban sprawl.
162	3/19/2021	Andy Hix	Against	Beaver Creek	Please do not let the county change the zoning. This area benefits from an important wildlife corridor as well as an aquifer recharge area.
163	3/19/2021	Jan Diemart	Against	Beaver Creek	Please do not destroy our way of life. There's plenty of room for such a huge warehouse in the areas that have already been destroyed.
164	3/19/2021	Patricia Menzies	Against	Beaver Creek	This is a terrible idea. The intersection is already a difficult intersection. Adding thousands of trucks and vans would make it a nightmare. Besides, the impact to nearby Beaver Creek would be horrid.
165	3/18/2021	Joy Moran	Against	Beaver Creek	The development at 93rd is bad enough, this would really create a mess. Besides the traffic, you have Beaver Creek running through there and it is worthy of protection.

Maya Teeple

From: Esther Grace Kronenberg <wekrone@gmail.com>
Sent: Friday, February 26, 2021 4:59 PM
To: Maya Teeple
Subject: Beaver Creek land Use Amendment

Dear Ms. Teeple,

I am opposed to rezoning 390 acres of rural land to allow the construction of a warehouse fulfillment center. A similar proposal was fought for years at Rocky Prairie. Also, there are plans for a warehouse on Port property in Tumwater, just a few miles north.

The County just adopted the Climate Change Plan. One of its core components is the planting of trees and the restoration of natural areas. This proposal appears to be directly contradictory.

I see no reason to re-open the docket process for a non-urgent land use change. Business interests cannot continue to supercede the imperative to protect our natural resources without doing grave damage to our continued prosperity and the public health.

Thank you.

Esther Kronenberg

P.S. Where can I access the documents submitted for this proposal?

Maya Teeple

From: Victoria Blaze <blue28now@yahoo.com>
Sent: Sunday, February 28, 2021 3:56 PM
To: Maya Teeple
Subject: Rezoning Rural Resources Industrial

Ladies and Gentlemen:

If the County's intent is to allow more residences for the homeless, why would zoning need to be changed to industrial?

If the County's intent is to allow industrial activities, such as mining, under this proposal, why not just say so?

In either case, I urge you to vote "NO" on this proposal.

Victoria Blazejewski
PO Box 822
10503 Creek Street
Yelm, WA 98597

360-894-1592 Unlisted

Maya Teeple

From: Lynn Gudgel <lynn_gudgel@hotmail.com>
Sent: Sunday, February 28, 2021 5:59 PM
To: Maya Teeple
Subject: PUBLIC COMMENT ON PROPOSED AMENDMENTS TO THE 2020-2021 OFFICIAL DOCKETS of Comprehensive Plan and Development Code Amendments

Dear Maya,

My comment is that these proposals should NOT be added to the dockets.

Question: If the county is considering altering the plan to accommodate homeless residences, why would the zoning need to be changed to Rural Resources *Industrial*?

Lynn Gudgel

Maya Teeple

From: Sally Nole <sksnole@hotmail.com>
Sent: Monday, March 1, 2021 8:52 AM
To: Maya Teeple
Subject: Public Comment on Beaver Creek Land Use Amendment

Ms Teeple

I live on Tilly Rd S, in between freeway Exit 99 (Pilot) and Exit 95 - Maytown.

I have many issues with this proposed amendment to the BoCC docket.

My first issue:

The Exit 95 amendment is not necessary, because the builder says he does not have a timeline. Therefore, there is no need to fast track this proposal. Please let it go through normal process.

Thank You,

I will have No Easy Way Home to South Thurston County.

Sally Nole

Maya Teeple

From: Sally Nole <sksnole@icloud.com>
Sent: Tuesday, March 16, 2021 6:57 AM
To: Maya Teeple
Subject: Beaver creek rezoning

Please do not rezone the Beaver creek Dairy. There are already too many empty warehouses in Thurston County. We need to be protecting farmland but allowing it to be converted to industrial areas not needed in south Thurston County. This land grab is destructive and adds to climate change.
Sally Nole

Sent from my iPhone

Maya Teeple

From: Kristie Danzer <kristie@6kproducts.com>
Sent: Monday, March 1, 2021 8:58 AM
To: Maya Teeple
Subject: MAYTOWN WAREHOUSE

Hello Maya,

Just wanted to give my opinion on the proposed Warehouse in the Maytown area.

This seems like a REALLY GOOD location for a warehouse, close to Freeway access with limited impact on residential areas! It is LOGICAL to place

This kind of business as close to the Freeway as possible! Hopefully, the tax revenue from this sort of business would be very good 😊

Regards,

Kristie Danzer
6K Products
360-264-2141
360-264-5105 fax
kristie@6kproducts.com

Maya Teeple

From: Thomasina Cooper
Sent: Monday, March 1, 2021 10:05 AM
To: Maya Teeple
Cc: Robin Courts; Sara Develle; Katelyn Johnson
Subject: FW: No more building,construction in the 93rd and Maytown. You will be destroying wildlife and make more of a mess on the roads. Ruin the country!

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Maya,
 Please see comment for the record below.
 Thanks!
 Thomasina

From: County_Commissioners <County.Commissioners@co.thurston.wa.us>
Sent: Sunday, February 28, 2021 7:32 AM
To: Robin Campbell <robin.campbell@co.thurston.wa.us>; Robin Courts <robin.courts@co.thurston.wa.us>; Ramiro Chavez <ramiro.chavez@co.thurston.wa.us>; Gary Edwards <gary.edwards@co.thurston.wa.us>; Tye Menser <tye.menser@co.thurston.wa.us>; Thomasina Cooper <thomasina.cooper@co.thurston.wa.us>; Carolina Mejia-Barahona <carolina.mejia@co.thurston.wa.us>; Sara Develle <sara.develle@co.thurston.wa.us>; Katelyn Johnson <katelyn.johnson@co.thurston.wa.us>
Subject: FW: No more building,construction in the 93rd and Maytown. You will be destroying wildlife and make more of a mess on the roads. Ruin the country!

From: Thurston County | Send Email
Sent: Sunday, February 28, 2021 3:32:21 PM (UTC+00:00) Monrovia, Reykjavik
To: County_Commissioners
Subject: No more building,construction in the 93rd and Maytown. You will be destroying wildlife and make more of a mess on the roads. Ruin the country!

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **the Thurston County Commissioners**

Subject:

From: **Margaret Hancock**

Email (if provided): maggie1849@comcast.net

Phone: (if provided):

Message:

No more construction on 93rd and Maytown. You will be ruining the country, wildlife and making more of a mess on the roads. Noise will increase and more crime. Greed will ruin. Stop the building!

Maya Teeple

From: Thomasina Cooper
Sent: Monday, March 1, 2021 10:09 AM
To: Maya Teeple
Subject: FW: Beaver Creek land use change proposa

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Maya,
 Please see the email below. Is there a sense of when a public hearing might be scheduled? Also, when does the comment period close?

I will reply with information about the project, process and links to more info.

Thanks bunches!
 Thomasina

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, February 26, 2021 8:46 PM
To: Tye Menser <tye.menser@co.thurston.wa.us>
Subject: Beaver Creek land use change proposa

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Tye Menser - District 3 Commissioner**

Subject:

From: **Jana Wiley**

Email (if provided): Janalynwiley@aol.com

Phone: (if provided): **(360) 943-0623**

Message:

What are the impacts of this proposal to the aquifer, Beaver Creek, traffic and air pollution? This latest proposal feels exactly like the other ones that TC residents have come out against, only now it is buried news with NO PUBLIC HEARING scheduled. I am would like to hear about the back story to this. My friends who live out that way, who for years have protested a rail industrial park, had no clue.

Maya Teeple

From: Josh <toodeep_one@yahoo.com>
Sent: Monday, March 1, 2021 7:54 PM
To: Maya Teeple
Subject: Oppose - Beaver Creek: Land Use Plan and Rezoning Amendment

Commissioners,

I strongly oppose the Beaver Creek proposal to convert rural residential land to industrial. The current industrial zoning in the Maytown area was wrong headed to start with. That is a rural community if ever there was one and intensive industry of any kind doesn't belong there. Now it's being built up, why, because the land is cheap and near I5, no other reason. There is literally millions of unoccupied square feet of warehouse that could be used for this exact project in Lacey. But it's cheaper for them to build their own on cheap farm land rather than lease an existing space.

Residents of South County are quickly being relegated to using side streets rather than I5. Exit 99 is being built up with a huge increase in traffic predicted, it's already an extremely dangerous intersection with numerous large projects slated for the area, it will drive residents to the next nearest exit, Maytown. If that is flooded with semi-trucks, making it dangerous for commuters, we will be stuck using Old 99 adding many miles and time to our daily commutes.

The current location of the majority of the warehousing in Thurston County is in Lacey, 95% of that traffic goes north keeping the truck traffic through our County to a minimum. Locating any significant amount of warehousing in the South County will put that semi-truck traffic traveling through our entire county, increasing congestion on I5 and pollution in our county. No one wants that.

Farmland is disappearing in our county at an extremely high rate. Converting 390 acres of it to industrial takes us in the wrong directions. Farmland is precious, the Kent Valley was some of the best farmland in the country, it's now wall to wall warehouses due to a policy of letting farmland be converted to industrial land. The crime rate is extremely high, housing cost is high, poverty is high, demand on public services is high. The rural character of South County is extremely valuable, it's why people choose to live here. We do not want to the industrialization of any part of rural Thurston County, much less farmlands and residential areas.

If you think a fulfillment or distribution center will bring jobs, you are right, but very few compared to the impact of the project. 95% of the time, they are temp jobs with no benefits, no vacation, and they are rarely made permanent. Most of the jobs these facilities claim they will bring are truck drivers who are not located here and were truck drivers before, it's just another stop. The warehouses in Lacey are constantly seeking workers, the work is boring, monotonous, and injuries rates are high. The average warehouse worker lasts 2-3 years. We don't need more warehouse jobs, we can't even fill the ones we have.

I have done ample research on the impact of large warehouses, the treatment of the workers, the impact to the local economy, the air, the traffic, the environment. I am happy to sit down with any of the commissioners or staff to review this research.

You must also be aware that a project like this will be subject to massive public and environmental scrutiny, consuming thousands of hours of staff and hundreds of hours of commissioner time for a project that may ultimately be rejected. You saw the massive public outcry against the Rocky Prairie industrialization and that was just during the consideration of docketing. The same people will be effected by this project, there is no reason to waste tax payer dollars docketing this project. Reject it now.

Thank you for your time and consideration.

Josh Stottlemeyer
 11204 Chaucer Lane SE
 Olympia, WA 98501

HATTON GODAT PANTIER

March 1, 2021

Ms. Maya Teeple, Senior Planner
Thurston County
Community Planning & Economic Development
2000 Lakeridge Dr SW, Bldg 1
Olympia, WA 98502

RE: Beaver Creek Industrial Park, (HGP #20-083)

Dear Ms. Teeple:

Please accept this letter in support of the proposal for a land use and zoning amendment for the Beaver Creek Farm.

With the addition of this request to the 2020-2021 official docket, the proposal can be evaluated for a possible amendment to the County Comprehensive Plan. Currently, the site is used for agriculture purposes, specifically a working dairy farm. Beaver Creek is located along the westerly and southerly portions of the site and the I-5/Maytown interchange is located within ¼ mile of the site. A railroad also exists along the easterly portion of the property. Land located adjacent to and northeast of the Beaver Creek Farm is currently designated as Rural Resource Industrial, which is consistent with the proposed land use designation for Beaver Creek Farm. A change of land use from the existing dairy farm to a controlled industrial use will provide added protections to Beaver Creek and to the Aquifer by eliminating the farm practices that can contribute to elevated nitrates. The industrial use can also provide for positive economic impacts, as a result of an increase of jobs to the south county area.

The Beaver Creek property provides for a unique opportunity because of the parcel size, location to I-5 and rail transportation.

Chapter 36.70A.365 provides for criteria from which major industrial developments can occur outside urban growth areas. With approval of the Beaver Creek Comprehensive Plan Amendment to the official docket, the applicant can work with County staff and stake holders to evaluate the merits of a unique opportunity to provide new employment in the south Thurston County region.

Sincerely,

HATTON GODAT PANTIER



Jeff S. Pantier, PLS
Sr. Vice President

JSP:bac

Enclosures: Copy of Email from Maya Teeple, Thurston County CPED-02/26/21

cc: Correspondence File 20-083

Hatton Godat Pantier, Inc.
3910 Martin Way E, Suite B
Olympia, WA 98506

T 360.943.1599
F 360.357.6299
800.700.1693

hattonpantier.com

Maya Teeple

From: Madeline Bishop <mbishop.bishop@gmail.com>
Sent: Tuesday, March 2, 2021 10:55 AM
To: Maya Teeple
Subject: Beaver Creek Dairy

Do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'. There is no staff time available to figure you what to remove from the docket and important work would suffer trying to get this in now.

Madeline Bishop
9529 62nd Ave SE
Olympia, WA 98513

Maya Teeple

From: Phyllis Farrell <phyllisfarrell681@hotmail.com>
Sent: Tuesday, March 2, 2021 11:14 AM
To: Maya Teeple
Cc: Tye Menser; Gary Edwards; Carolina Mejia-Barahona
Subject: Beaver Creek Dairy rezone

Greetings Maya, hope you are well.

The Beaver Creek Zoning Change should not be added to the Thurston County 2020-21 Planning Docket. It is my understanding the docket is already full and staff time would need to be reprioritized. Additionally, this proposal should not be considered because this rezone would result in loss of ag land which we need to protect.

Thanks!

Phyllis Farrell

Sent from [Outlook](#)

Maya Teeple

From: VanderVeen, Arvin <Arvin.VanderVeen@colliers.com>
Sent: Tuesday, March 2, 2021 12:40 PM
To: Maya Teeple
Subject: Rezone for the proposed Beaver Creek Industrial Park in Maytown just off of I-5

I read about this and did some checking and I am strongly in favor of you approving this rezone. I went to the site and I could see the cattle that exist there now and with so many cattle so close to Beaver Creek that I have to believe that there must be some contamination from the cattle manure and urine. If this were redeveloped into industrial that would end that and save the creek and the wetlands. This project would also offer quite a number of new jobs which the county needs and it will also generate a large real estate tax revenue which the county can probably use also. Don't know for sure but some road improvements will probably come along with the new project which everyone can enjoy. Please share my thoughts with whomever you like to encourage this positive rezone, thank you.

Arvin Vander Veen | SIOR
Executive Vice President | Seattle
Dir +1 206 654 0521
Main +1 206 223 0866 | Fax +1 206 223 1427
arvin.vanderveen@colliers.com

Colliers International
601 Union Street, Suite 5300 | Seattle, WA 98101 | USA
www.colliers.com



View the current issue of *[Knowledge Leader](#)*.



Maya Teeple

From: Sharron Coontz <sharron.coontz@gmail.com>
Sent: Tuesday, March 2, 2021 3:11 PM
To: Tye Menser; Gary Edwards; Carolina Mejia-Barahona
Cc: Maya Teeple
Subject: Beaver Creek Rezone Docket Issue

Hello, Commissioners - There are two serious issues I'd like to weigh in on:

I. I'm curious as to how the suggestion for the Beaver Creek rezone is even being proposed between docketing cycles. We just went through this with the proposed NorthPoint rezone. During those discussions I thought staff and Commissioners realized and made clear that allowing some big company to "jump the line" would be terribly unfair to county citizens who have to follow the rules and wait their turns.

The applicants made clear in conversations with me that there are NO time constraints and that they don't have to hurry this project along. I'm wondering if they told you something different when they asked for this exception to county policy. Even if they did make such a claim, though, it would still be unfair to allow them special exemptions. This is not an urgent project, nor is it something this county needs. I hope you will refuse to interrupt the docketing process for this. This will be a high interest project (see below) and require much staff time.

II. We're facing a serious issue of cumulative impacts, as SEPA refers to them, in South County. This new projected warehouse is at Exit 95 of the freeway. Exit 99 is just 4 miles north and already a terrible traffic mess just because of the very large Pilot truck stop there on the NE corner. Soon all four corners of that intersection will be huge facilities: There's another large Pilot center going in on the SW corner, a million square foot "commercial center" going in on the NW corner, and Tumwater is in the process of permitting a million square foot warehouse (most likely fulfillment center) at the SE corner.

People moved to this area expecting and treasuring (as you saw in the response to the NorthPoint proposal to rezone Rocky Prairie) the rural character of the county, including farm land, forests, prairies and wetlands. Now we have the official exit for Millersylvania State Park (Exit 95), and the same community that was so upset with NorthPoint, again facing a million square foot fulfillment center (the warehouse use with the most intensive traffic) bringing thousands of daily truck trips to this sensitive area, including the salmon-bearing Beaver Creek and nearby forests, and, of course, destroying the farmland the project would replace.

Thurston County's rural character is at stake here. Our aquifer is at stake. The two main exits for South County are at stake. We can't just approve every project that is allowed by law. There has to be a limit, an examination of cumulative impacts.

I think the applicants' request to interrupt the normal docketing sequence should be denied. But further, I think they should have it explained that the citizens of South County aren't welcoming a project that destroys farmland, increases traffic on our county's roads (which it would, no matter how much the applicant says it wouldn't), and further blights the landscape of what should remain a rural part of Thurston County.

Thank you.
 Sharron Coontz

Maya Teeple

From: Sharron Coontz <sharron.coontz@gmail.com>
Sent: Thursday, March 4, 2021 7:48 PM
To: Tye Menser; Gary Edwards; Carolina Mejia-Barahona
Cc: Maya Teeple
Subject: Beaver Creek Rezone

Hi, Commissioners. I'd first like to apologize for misunderstanding the heading in the notice for this proposed rezone. I thought that the title "mid-cycle docket amendment" meant the applicants were doing what NorthPoint tried to do, skipping the regular process. I've been corrected by Maya and Thomasina.

I want to make clear, however, that my objections to this rezone remain. Two million-square-foot warehouses and the traffic and pollution they bring at exits within 4 miles of each other do not comport with the rural area that is valued by so many. And the threat to Beaver Creek, the tranquility of Millersylvania State Park, the loss of valuable farmland, and the other issues I've raised are reasons this rezone should be rejected before it wastes hours and hours of staff time. You already know, thanks to the NorthPoint rezone request, the attitude in South County and how unwelcoming your constituents there are to further degradation of the rural landscape they love.

Thanks for your attention, and again, sorry for my earlier misunderstanding.

Sharron Coontz
3716 85th Ave. NW
Olympia, 98502

Maya Teeple

From: Sharron Coontz <sharron.coontz@gmail.com>
Sent: Wednesday, March 17, 2021 10:36 PM
To: Tye Menser; Carolina Mejia-Barahona; Gary Edwards
Cc: Maya Teeple
Subject: Beaver Creek Rezone
Attachments: Tilghman Memo 29 Jan 2021 (2).pdf

I apologize. I sent the previous email with "Fwd, One More Request" in the subject line as I struggled to get help from a friend to get the attachment on. I am seriously computer-impaired. This is a re-send with the proper subject for the record. Thank you, and again, sorry. Sharron

Hello Commissioners --

During the comment period for the new million-square-foot warehouse at 93rd Ave. in the Tumwater Urban Growth Area (just 4 miles north of the Beaver Creek site in question), concerned citizens realized that the traffic projections provided by the applicant were based on incomplete information and thus were highly misleading and inaccurate. So we hired an expert to provide a report based on the latest edition of the Institute of Transportation Engineers' manual. Attached is his memo wherein he gives the actual traffic projections for the various types of warehouses, indicating also which have maximum employees.

If this is a sorting warehouse, then employment numbers are on the low end of the scale because there's even more automation there, and the traffic numbers are lower: Approximately **1900 vehicle trips a day**. That's the **LOW** number for this sensitive, rural area.

The high number is for a sorting fulfillment center, which I think they are going for based on my conversations with the applicant and the financial backer. Although also automated, this has more employees and far more traffic, over **7,000 vehicle trips a day**. That's not a misprint, it's an astonishing number rarely if ever provided by applicants trying to convince people that a project like this would be a low-impact addition to the neighborhood. And think of the cumulative impacts on air quality in Thurston County when added to the new warehouse and commercial center just to the north.

Developers always talk about needing finality in land use -- don't you dare change your requirements for my project or my property once I've bought it. But what about the average citizen who's confident that they've got a house away from urban sprawl or industrialization? They expect that the zoning will protect them. **And so it should**, except in the case of an emergency requiring changes. One more warehouse 4 miles south of another certainly doesn't constitute a need, let alone an emergency.

At one point the applicant said to me that neighbors wouldn't need to worry about traffic in the neighborhood, since this site is so close to the freeway. With the increased traffic from the new developments just 4 miles north, there are going to be many more times when traffic is slow in this area (there are already plenty). What do truckers do when that happens, since they're not paid by the hour anymore but by the trip? They hastily scan their cell phones for alternate routes and take back roads -- county roads -- to go around the blockages. (Remember the Maytown exit crash a couple of years ago and the mess caused on Case Road and Old 99?) Plus, of course, with a fulfillment

center, you have all the vehicles that will be fanning out from the center to deliver to houses all over the area and traffic will vastly increase on our local roads.

There are plenty of science-based reasons to avoid this project, as you'll see in hydrogeology reports, letters dealing with the need to protect farmland (no net loss?), protection of wildlife, the effect on the area from such huge pollution by thousands of extra vehicles each day. But I hope you'll see that, in fact, those aren't necessarily the only important reasons to reject this rezone. The faith and trust by your constituents that their way of life, defined by county zoning, isn't going to be ruined should also be a top concern, I think. Destroying the last semi-rural exit in the area, the one to the Scenic Byways touted by the Visitors' Bureau, the one to Millersylvania State Park, would be a blow to a great many of those rural constituents and other county citizens who come to the country and the park for respite.

Thank you.

Sharron Coontz

3716 - 85th NW

Olympia, WA 98502



MEMO

To: Janet Witt

From: Ross Tilghman

Date: 29 January 2021

Subject: Tumwater I-5 Distribution Center Trip Generation

You asked that I calculate the number of vehicle trips that could be expected from each type of warehouse for which the Institute of Transportation Engineers (ITE) has trip rates for the 1,098,000 square feet proposed for the I-5 Distribution Center. The resulting daily and p.m. peak hour trips are shown below.

Warehouse Type	ITE #	Size (Sq. Ft.)	Daily Vehicle Trips	PM Peak Hour Vehicle Trips	Remarks				
High-Cube Transload and Short-Term Storage	154	1,098,000	1,537	110					
High-Cube Fulfillment Center Warehouse -- Non-Sort	155	1,098,000	1,987	176	<i>A non-sort warehouse is largely automated.</i>				
High-Cube Fulfillment Center Warehouse -- Sort	155	1,098,000	7,071	1,318	<i>A sorting warehouse has high employment and sends out small items</i>				
High-Cube Parcel Hub Warehouse	156	1,098,000	5,084	703	<i>Trip data are from much smaller sites</i>				
High-Cube Cold Storage Warehouse	157	1,098,000	2,328	132					
Source: ITE Trip Generation, 10th ed.									

Note that two types of fulfillment centers exist: sorting and non-sorting. The sorting type generates vastly more traffic than any other type of warehouse and would require much more land for employee parking and delivery vehicle staging.

Ross Tilghman is a transportation planning consultant with his own firm, the **Tilghman Group**. He has over 35 years of experience in analyzing transportation demands for a wide variety of land uses and in developing solutions to meet transportation needs. A full member of the Urban Land Institute, Mr. Tilghman is a frequent participant in ULI Advisory Service Panels working in communities around the country and has been active in developing ULI's Building Healthy Communities initiative. He currently serves on ULI's Suburban Development and Redevelopment Council. Tilghman served five years on the Seattle Design Commission (2014-2019), including as Vice- Chair and Chair.

Maya Teeple

From: northbeachcomm@cs.com
Sent: Wednesday, March 3, 2021 6:37 AM
To: Maya Teeple
Cc: Gary Edwards; Tye Menser; carolyn.meija@co.thurston.wa.us
Subject: "NO!"Beaver Creek Area Proposed Development

March 3, 2021

Dear Thurston County Commissioner;

Please.....do not allow a private developer to circumvent the normal docketing process for a Comprehensive Plan Amendment for the Beaver Creek Rezone.
 Many other county applicants waiting their turn to come to the docket. It is not fair to allow Beaver Creek development for another huge warehouse, to rezone early!

There is a Beaver Creek creek, that will be destroyed by the stormwater.
 A huge warehouse is being build at 93rd AVE, exit 99.
 We need another one on Beaver Creek?

These are huge buildings...huge parking lots that will hold trucks and cars,
 that will push contaminated storm water into our sacred Beaver Creek. Is this right? This huge area will be covered by pavement, by asphalt.
 We do not need to pave more farmland.

Thurston County needs our farm land. We need our farmers jobs! We need food.
 Climate change is here.....the new President Biden, has called for us to save more land to help fight climate change.
 Save Farmland!
 Save Mother Earth.....save Farmer's jobs!

"NO".....TO THE BEAVER CREEK REZONE ! We know the developers "have you in their sights"....but we need farmers, and farm jobs....not more pavement!
 Thanks;

lee Riner
 2103 Harrison
 OLY., WA
 98502
 360-956-0022

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So, two steps to be removed. If you have trouble, you are welcome to simply ask to be unsubscribed or to receive the digest, etc.

 To unsubscribe: <mailto:growthtalkolympia-unsubscribe@lists.riseup.net>

Maya Teeple

From: Janet Jordan <janetjordan@fastmail.fm>
Sent: Wednesday, March 3, 2021 8:59 AM
To: Maya Teeple
Subject: rezone next to Milleersylvania State Park

Dear Ms. Teeple,

I am writing about the request to rezone 390 acres of farmland at Exit 95 on I-5, to use for a warehouse.

Please do not consider this rezone. The area was zoned for farmland because we need that farmland! Not only do we need the food production, we need the soil to be carefully preserved because it contains so much carbon and helps so much with climate change. It's a world-wide crisis; let's respond in a responsible way, by preserving farmland.

By contrast, we do not need more "fulfillment centers". A new one is going in just 5 miles to the south of this site. If the company absolutely must have more warehouses, let them find brownfield somewhere else, and bring it up to the standard they want, rather than degrading pristine farmland.

The danger to the soil is primary, but the runoff from that new warehouse and the associated impermeable surfaces will also damage nearby Beaver Creek, one of the last remaining pristine, salmon-bearing streams emptying into the Sound.

I hop you will deny the request for a rezone. Thank you.

Sincerely,

Janet Jordan
703 Sawyer St SE
Olympia, WA 98501

--

Janet Jordan
janetjordan@fastmail.fm

Maya Teeple

From: THOMAS HOLZ <tomholz@comcast.net>
Sent: Wednesday, March 3, 2021 9:21 AM
To: Maya Teeple
Subject: Beaver Creek Area Proposed Development

Maya

Please advise Commissioners that they should not allow a private developer to circumvent the normal docketing process for a Comprehensive Plan Amendment for the Beaver Creek Rezone.

Moreover, the sensitive nearby Beaver Creek is a salmon bearing waterbody and would suffer from such a project.

Tom Holz
6135 Mink Street NW
Olympia, WA

Maya Teeple

From: Thomasina Cooper
Sent: Monday, March 8, 2021 8:39 AM
To: Maya Teeple
Subject: FW: Beaver Creek Land Use Amendment, proposal to amend the land use and zoning of approximately 390 acres in rural Thurston County from Rural Residential Resource 1 unit per 5 acres to Rural Resource Industrial

Hi Maya,
 Please add the email below to the public record.

Thanks bunches!
 Thomasina

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Saturday, March 6, 2021 12:38 PM
To: Tye Menser <tye.menser@co.thurston.wa.us>
Subject: Beaver Creek Land Use Amendment, proposal to amend the land use and zoning of approximately 390 acres in rural Thurston County from Rural Residential Resource 1 unit per 5 acres to Rural Resource Industrial

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: Tye Menser - District 3 Commissioner

Subject:

From: Lori Beebe

Email (if provided): bbet@msn.com

Phone: (if provided):

Message:

In regard to the Beaver Creek Land Use Amendment, proposal to amend the land use and zoning of approximately 390 acres in rural Thurston County from Rural Residential Resource 1 unit per 5 acres to Rural Resource Industrial, it should be duly noted myself and my husband are adamantly OPPOSED to this proposal.

The current traffic in this area is already on the rise and almost beyond capacity. Semi truck traffic from the Freight Liner already impedes the flow of traffic on Case and Little Rock roads. This proposed land zoning change would have direct negative impacts on traffic flow, the rural life style, peace and prosperity of our RURAL area. Industrial zoning and use near or adjacent to Beaver Creek is not environmentally sound and will have nothing but detrimental environmental impacts to the creek, water quality, wild life and farming to the entire area for miles. If this proposal is approved and

completed the rural life style, home values and natural environment will all be forever decimated and lost. As our County Commissioner(s) we are asking you to vote against this proposal.

Maya Teeple

From: Sara Foster <saradfoster@gmail.com>
Sent: Saturday, March 6, 2021 5:39 PM
To: Maya Teeple
Subject: Proposed amendments to Thurston Cty Dockets

Why would the zoning need to be termed industrial? My opinion is NO.

Sincerely,

Sara Foster



Friday, March 5, 2021

Maya Teeple
Thurston County Community Planning
Senior Planner
2000 Lakeridge Dr SW, Bldg 1
Olympia, WA 98502

RE: Beaver Creek Land Use Plan and Rezoning Amendment

Dear Maya:

Please review this letter in support of the proposal for consideration for additions to the official docket.

At this time, 40% of the current land in Thurston County is zoned 1/5. The cost in purchasing, developing and county fees for a small tract of land in Thruston County is very expensive. The need for more jobs and increased tax base would certainly help Thurston County.

For a moment, let's take a step back. Any property owner in Thurston County has the right to ask for a rezoning amendment to their property. Beaver Creek Farm has elected to do so. It's Beaver Creek Farm and the proposed applicant HW Seattle that's requesting these changes.

It's any property owners right to decide what they elect to do with their property, not someone else telling them what to do with their land. Yes it's pretty to look out over the green pastures at the black and white cows but who owns this property? Did we forget who's been paying taxes for this land?

The current state and county regulations for any parcel to be developed will be looked at and I can assure you that Thurston County should treat this property as if it were someone else's property wanting to sell.

The current farm, in it's daily operation 24/7 changing to an Industrial Site from farming, should help the environment and Beaver Creek by eliminating current farm practices that can contribute to elevated nitrates in the soils and water.

Please move forward allowing this amendment to be considered.

Sincerely,

Jim Bennett
REALTOR®, CRS
Designated Broker

RE/MAX Parkside Affiliates

300 Deschutes Way SW, Suite 200 • Tumwater, Washington 98501

Office: (360) 754-7090 • Fax: (360) 754-6640

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Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, March 5, 2021 3:13 PM
To: Maya Teeple
Subject: Beaver Creek Industrial Developmental Rezon

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Maya Teeple**

Subject:

From: **Don Goethals**

Email (if provided): **don@homeswithdon.com**

Phone: (if provided): **253-891-9000**

Message:

There are may advantages to the rezone of this development property including new jobs that can help the local community, environmental clean up and substantial new property tax revenue which could be of great value to Thurston County.

Maya Teeple

From: william webster <viaggiojsa@gmail.com>
Sent: Friday, March 5, 2021 1:49 PM
To: Maya Teeple
Subject: RE: Beaver Creek Ind. Park

Ms. Teeple, we are asking for your support of our Beaver Creek Industrial park and its rezoning request from RRR1-5 to RRRI

South Thurston County has 0.04 percent; of its land zoned for industrial while 40.0 percent of its land is zoned RRR1-5 or one home per five acres. I read that in the lawsuit the State brought against Thurston County for not complying to the State's Growth Management Act.

Our project (a) creates new, clean jobs, (b) reduces nitrates into the water system in the area by closing the dairy, (c) provides 200 acres of open space, (d) greatly increasing the flow of property taxes into Thurston County and (e) reduces the number of cars on I-5 every morning having to drive to Tacoma and Seattle for work.

Again, we ask that you support our Beaver Creek Industrial project.

Sincerely yours,

Bill Webster
HW Seattle, LLC
760-221-2595

Maya Teeple

From: william webster <viaggiojsa@gmail.com>
Sent: Friday, March 5, 2021 3:06 PM
To: Carolina Mejia-Barahona; Sonja Cady; Maya Teeple; David Hewitt; cade@co.thurston.wa.us
Subject: RE: Beaver Creek Industrial Park

Commissioner Mejia-Barahona, I want to restate one obvious fact, in case it starts to become an issue, our project is not part of Rocky Praire and our project will not increase traffic in Rocky Prairie.

While it may give those anti-growth Rockie Praire group something to do, the facts are that we create short and long-term clean jobs for young people, eliminate the nitrates spread on the land each year and reduce the number of cars driving to Tacoma and Seattle each day to find or go to work.

And I also need to mention, the millions of dollars of property taxes that will flow into Thurston County from this project.

Thank you,

William Webster
Beaver Creek Industrial Park
760-221-2595

Maya Teeple

From: Thomasina Cooper
Sent: Friday, March 5, 2021 10:48 AM
To: Maya Teeple
Subject: FW: Proposed development at Maytown Exit

Hi Maya,
 Please add the comment below to the public record.

Thanks!
 Thomasina

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, March 5, 2021 10:34 AM
To: Tye Menser <tye.menser@co.thurston.wa.us>
Subject: Proposed development at Maytown Exit

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: Tye Menser - District 3 Commissioner

Subject:

From: Lorraine James

Email (if provided): Lfjaws@hotmail.com

Phone: (if provided): **3602738939**

Message:

NO REZONE OF EXIT 95! Do NOT consider an application to rezone the Maytown exit. This does NOT need to be put on the docket at this time. With the development of exit 99 on 93rd this would create a traffic nightmare from Chehalis to Tumwater.

The Beaver Creek area is environmentally sensitive, as is all of the Black River watershed. Exit 88 already has plans for industrialization. ONCE IT'S GONE, IT'S GONE.

March 8, 2021

Thurston County Board of Commissioners
2000 Lakeridge Drive SW
Olympia, WA 98502

SUBJECT: Beaver Creek Land Use Plan and Rezoning Amendment

Dear Commissioners,

We are opposed to docketing of the Beaver Creek Land Use Plan and Rezoning Amendment which would allow for the conversion of 390 acres of rural agricultural land to industrial/warehouse use. We urge you to preserve the existing Rural 1/5 zoning designation and this important agricultural land.

Rezoning this property to allow industrial warehouse use would mean the loss of valuable agricultural land at a time when high quality agricultural land should be preserved. It would result in acres of impervious surface and stormwater runoff that would increase flooding and degrade water quality of Beaver Creek which is a salmon-bearing stream and major tributary of the Black River. Beaver Creek and Black River are already listed by Washington Department of Ecology on 303(d) Clean Water Act list of impaired water bodies due to pollution with a mandate to restore the waterbodies to meet water quality standards. This property is not flat, it is rolling hills. Warehouse development on this property would require massive amounts of earthmoving and complete destruction of the land.

An industrial warehouse development would create high volumes of truck traffic, noise, lights that are incompatible with the rural nature of this area. The traffic has already been increasing as a result of development of the existing light industrial-zoned property near the east side of the Maytown interchange. There are major warehouses and distribution centers under construction off 93rd interchange just north of Maytown, which has become a traffic nightmare. The next access to I-5 to the south of Maytown is Grand Mound interchange, which is already highly commercial and congested. Adding 390 acres of industrial area on the west side of the freeway at Maytown would make access to I-5 and the Scatter Creek Natural Area down Case Road extremely difficult.

We have lived in the Maytown/Littlerock area for over 30 years. People make decisions about where they choose to live and buy their home based on the nature of an area and a belief that county plans and zoning will preserve that nature and allow only compatible uses. A warehouse complex with semi-truck traffic, floodlights, noise and acres of asphalt is not compatible with the rural life and livestock-keeping, or nearby Scatter Creek Natural Area, Rocky Prairie Conservation Area, Black River Wildlife Refuge and Millersylvania State Park.

County Comprehensive Plan states, "Rural areas are characterized by a balance between the natural environment and human uses with low density residential dwellings, farms, forests, mining areas, outdoor recreation and other open space activities. Commercial uses will be small in scale and will provide convenience services to the rural neighborhood. Industrial uses will generally be those that are related to and dependent on natural resources such as agriculture, timber or minerals." (Ref pg. 2-11)

General Decision-Making Guidelines on page 2-10 state, “Desires of the citizenry for certain types of land uses over other types should be an important consideration in making land use decisions. Citizen preference is important, for example, when deciding to give weight to one factor over another, or in deciding among conflicting factors.”

We ask that you do not add this proposal to the docket, and that you keep the existing rural 1/5 zoning.

Respectfully,
John and Susan Davis

Maya Teeple

From: Sabine McDuff <sabine_mcduff@comcast.net>
Sent: Sunday, March 7, 2021 11:15 AM
To: County_Commissioners
Subject: Beaver Creek Land Use Amendment

Commissioners,

I just became aware of the proposed land use change near exit 95, the Maytown exit, to rezone from residential to industrial. As a resident of south Thurston county (I live on Tilley Rd just north of Millersylvania), I am worried about all the industrialization happening at the two freeway exits I use to get to my house. The Pilot station at exit 99 already causes some traffic headaches and adding more trucks will not make that better.

I am against another truck stop near beaver creek for many reasons:

1. environmental,
2. traffic,
3. maintaining the rural character of the area to which I moved just two years ago

Surely there is another alternative to this rather than paving over our beautiful areas. I would hate to become another California.

Thanks for listening,

Sabine McDuff
10436 Tilley Rd S
Olympia, WA 98512

Maya Teeple

From: Eric LaGasa <elagasa@icloud.com>
Sent: Monday, March 8, 2021 9:56 AM
To: County_Commissioners
Subject: Opposed to I-5, Exit 95 Developments

Extensive development of the area (I-5, exit 95 location) is inconsistent with current (and historic) land use in this area of Thurston County. Please do not approve or promote this development.

Thank You,

Eric LaGasa
1004 Wright Rd. S.E.
Tenino, Wa 98589
(360) 264-4742

Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, March 5, 2021 2:30 PM
To: County_Commissioners
Subject: The Beaver Creek Land Use Amendment.

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **the Thurston County Commissioners**

Subject:

From: **Deborah Watson**

Email (if provided): **starblue1@comcast.net**

Phone: (if provided): **360-819-4179**

Message:

Please do not approve the Amazon at Maytown exit. I also am against the Emergency Housing Ordinance, which proposes to make currently interim regulations permanent. Thank you for your time.

From: [Ramiro Chavez](#)
To: [Joshua Cummings](#); [Jennifer Davis](#); [Maya Teeple](#)
Subject: Fwd: re zone Maytown
Date: Friday, March 19, 2021 6:45:20 AM

FYI

Ramiro Chavez, P.E., PgMP
County Manager
Thurston County
Ramiro.Chavez@co.thurston.wa.us
[\(360\) 754-2960](tel:(360)754-2960)

Begin forwarded message:

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Date: March 19, 2021 at 6:40:21 AM PDT
To: Ramiro Chavez <ramiro.chavez@co.thurston.wa.us>
Subject: re zone Maytown
Reply-To: do_not_reply@co.thurston.wa.us

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Ramiro Chavez - County Manager**

Subject:

From: **Deb Watson**

Email (if provided): **starblue1@comcast.net**

Phone: (if provided): **360-819-4179**

Message:

Please no More big warehouses at Maytown Little rock
-- depended on county zoning when moving out here; don't change it for no good reason
-- new warehouse already planned for exit 99; don't need another here
-- county needs rural areas and farmland
-- Beaver Creek and its salmon need protection, not a project where diesel spills are likely

Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 4, 2021 4:32 PM
To: County_Commissioners
Subject: Maytown Rezone

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **the Thurston County Commissioners**

Subject:

From: **SARAH Eygabroat**

Email (if provided): **sarah@dbfarm.org**

Phone: (if provided): **3604857543**

Message:

Thank you for hearing our concerns regarding the reasoning and warehouse proposal at exit 95-the Maytown exit. My family has a small hobby farm on Beaver Creek Dr and the development/rezoning pressures in our neighborhood has been devastating to us. Beyond the proposed concerns listed below this email are what this would mean for my family. The more industrialized this area becomes, the more our quality of life is diminished and as a public school teacher we are priced out of the county. If our area becomes heavily developed with shipping companies we will have to leave the area. It is a beautiful location for all residents of Thurston County to enjoy and that would disappear with these proposed changes. The six significant concerns are also listed below. Thank you, Sarah.

- 1. Traffic nightmare: we have 2 exits in South County, 99 and 95.**

- 2. 390 acres of industrialized/warehouse property would destroy our county's rural character.**

- 3. Sensitive, salmon-bearing Beaver Creek is right next to the proposed warehouse.**

- 4. We shouldn't be destroying needed farm land in our county.**

- 5. There's a new similar warehouse going in already at Exit 99.**

- 6. There is no need for a warehouse fulfillment center at the freeway exit for Millersylvania, Exit 95. This new proposal will affect many of the same county roads and neighborhoods as the NorthPoint project that was rejected by the BoCC after intense community involvement.**

Maya Teeple

From: Joel Carlson <fox7799@gmail.com>
Sent: Tuesday, March 9, 2021 3:16 AM
To: Maya Teeple
Subject: Reject the rezone at Beaver Creek Dairy Farm

- **The Rezone Is Contrary to the No Net Loss Goal:** There is 300 acres of farmland on the land proposed for rezoning. If those 300 acres were to be reclassified as Rural Resource Industrial (RRI), the land could no longer be farmed as farming is not an expressly permitted in a RRI zone. Loss of this farmland is contrary to the stated No Net Loss of Farmland goal.
- **The County Does Not Need Additional Rural Resource Industrial Land:** The draft [2021 Buildable Lands Report](#), a document developed for use in city and county planning, finds more capacity for building on the current urban and rural industrial zones than the projected 20-year demand for such building space. In fact, some of that capacity is in the existing RRI zone at the Maytown intersection. That RRI zone is mostly undeveloped land. That undeveloped land includes parcels east of I-5 and north of Maytown Road.
- **More Details Needed on Warehouse Plans:** The Thurston Comprehensive Plan clearly states that activities in RRI zones meet specific needs of “natural resource-based industries” (Chapter 2, page 11). “Industrial areas and development shall be functionally and visually compatible with the surrounding rural area and uses in order to protect the rural character... The area should be located so that development will not detrimentally impact agriculture, forestry, aquaculture or other natural resource uses.” (Chapter 2, pages 29-30). The landowner’s request does not explain why a warehouse specific to the nearby forest, conservation, and agricultural activities is needed.
- **Rezone Actions Must Not be “Spot Zoning:”** The area around Beaver Creek Dairy Farm consists of other farms, forest land, homes on five acre lots, conserved areas, and wetlands. There are homes, farms and forestland along Maytown Road going west of the Beaver Creek Dairy Farm and on Case Road running south and parallel to I-5 down to Scatter Creek. These land uses are the permitted activities for a Rural Residential Resource 1-5 zone. Carving out RRI acreage in an area where land is used for rural homes, farms and forestry is not in accordance with the comprehensive plan. Doing so may fit the definition of “Spot Zoning.”
- **The [Community-Driven Review of Agricultural Policies and Practices](#) on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts:** This request to change farmland into industrial use is yet another sign that Thurston County lacks robust policies and practices needed to preclude farmland loss. The county and the community are working right now to develop new or enhanced policies and programs to change the picture that results in 3,000 farm acres lost every year. The Community-Driven Review must continue to be a high priority Docket item. It is the way the community can identify and forward needed policies and programs to the BoCC.
- **Request Revised Request Documentation:** The bar must be high when parties ask the county to trade one zoning designation for another. The landowner’s request documentation needs additional work to meet that high bar. The BoCC should ask for additional responsive statements. For example:

- The landowner states that current Rural Residential Resource 1-5 zoning (RRR 1-5) is inappropriate because it is near the interchange. On the contrary, being near a railroad and the interchange is a benefit for the dairy farm given that the farm brings in feed in large quantities and needs to accommodate the daily or every other day mail truck.
- When asked what conditions changed that now make RRR 1-5 zoning less appropriate than the proposed RRI (industrial) zoning, the landowner does not talk about condition changes for farms, forestry, and housing. No information is given to suggest the current zoning is now less viable than when the land was first zoned.
- When asked how the rezone would impact surrounding land use, the landowner states that homeowners would see “adequate buffers.” That is not responsive to the question of impact on surrounding farms, forestry, or housing.

Sincerely, Joel Carlson, 3634 Loren St NE, Lacey, WA 98516

Maya Teeple

From: Sharon Herting <seherting@hotmail.com>
Sent: Tuesday, March 9, 2021 9:02 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Sharon Herting from Olympia,98502-8792

Maya Teeple

From: Phyllis Farrell <phyllisfarrell681@hotmail.com>
Sent: Tuesday, March 9, 2021 10:30 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Phyllis Farrell

Sent from [Mail](#) for Windows 10

Maya Teeple

From: A P <nostampz@outlook.com>
Sent: Tuesday, March 9, 2021 11:47 AM
To: Maya Teeple
Subject: Keep S. Thurston County Rural

Hello Ms.Teeple,

I am adamantly opposed to any industrialization in rural South Thurston County. The proposed warehouse behind Freightliner must not be approved. This is a rural area!

I moved to Rochester from Seattle because of the rural character of the area. I love it here, and feel very strongly that industrialization does not belong here, for many reasons.

There is a creek nearby, how would that be affected? How will wildlife be affected and protected? Traffic, noise, and pollution are all other environmental concerns that would be detrimental to the area. We must keep Thurston County rural areas rural.

Surely there is a more suitable location in a more urban area! Please don't pave over paradise! There has to be a better way.

Sincerely,
Alice Flegel
Rochester, WA

Maya Teeple

From: A P <nostampz@outlook.com>
Sent: Tuesday, March 9, 2021 12:01 PM
To: Maya Teeple
Subject: Beaver Creek Land Use Amendment

Hello Ms. Teeple,

I am opposed to any industrialization in South Thurston County. We must keep the rural nature of the area rural!

I live in South Thurston County. I moved here because of the rural character here. Please do not approve any land use amendment that allows industrialization in South Thurston County.

A warehouse behind Freightliner has too many problems. What about the creek? How will that be protected? How will wildlife be affected and protected? The environmental concerns of traffic, noise, pollution, are all grave concerns.

I urge you to advocate for keeping South Thurston County rural by not allowing any land use amendment for the Beaver Creek proposal.

Sincerely,
Alice Flegel
Rochester, WA



Alice P Flegel
PO Box 1178
Rochester, WA 98579-1178

3-9-2021

Dear Mr. Teeple,
I am writing to you today to voice my
opposition to the Beaver Creek Land
Use Amendment. I live in South
Thurston County. The proposed
area is right in the middle of
the Maytown rural area!! On both
sides of the freeway!! This area
needs to please be kept rural!
I am opposed to any land use
amendment that allows industrial-
ization in our rural area! Sincerely,
Alice Flegel

Maya Teeple

From: E Zita <ejzita@gmail.com>
Sent: Tuesday, March 9, 2021 1:40 PM
To: Maya Teeple
Subject: No Beaver Creek rezone

To Maya Teeple, Senior Planner, and the Thurston County Board of Commissioners:

As a farmer, rancher, and longtime former member and chair of the Thurston County Agriculture Advisory Committee, I recommend that you NOT place the Beaver Creek Dairy Farm rezone request (to RRI) on the current Planning Docket.

The BoCC might consider the request when they develop the 2022 Docket. Several issues raise concern:

- * The Rezone is contrary to the County's No Net Loss Goal. Rezoning the property would result in a loss of 300 acres of farmland.
- * The County does not need additional Rural Resource Industrial (RRI) land, according to the [2021 Buildable Lands Report](#).
- * It is not clear why a warehouse is needed in this location. It is not clear that it would be "compatible with the surrounding rural area and ... not detrimentally impact ag, forestry, ... or other natural resources uses."
- * Rezone actions must not be "spot zoning." The proposed RRI rezone of Beaver Creek Dairy Farm would be carved out in the midst of Rural Residential Resource zoned properties. That is inconsistent with the Comp Plan.
- * We need review and protection of Ag lands, to meet Thurston County goals.

Thank you for your consideration. Sincerely, E.J. Zita

503-766-5399 <ejzita@gmail.com>
 PO Box 1441, Olympia, WA 98507

Maya Teeple

From: Paula Holroyde <hapapafarm@gmail.com>
Sent: Wednesday, March 10, 2021 1:00 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please consider how this affects our quality and quantity of groundwater.

Thank you,

Paula Holroyde from Olympia,98502

Maya Teeple

From: Paula <heronslea@q.com>
Sent: Tuesday, March 16, 2021 9:39 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

1 .The County Does Not Need Additional Rural Resource Industrial Land 2. More Details Needed on Warehouse Plans 3. Rezone Actions Must Not be "Spot Zoning 4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts 5. Request Revised Request Documentation

Thank you,

Paula Holroyde
Olympia
98502

Sent from "Live Pono"

Maya Teeple

From: County_Commissioners
Sent: Thursday, March 11, 2021 3:17 PM
To: Maya Teeple
Subject: FW: Beaver Creek Land Use Amendment

Public comment.

Thank you,

Katey Johnson

Executive Assistant to County Manager Ramiro Chavez
 Thurston County Commissioners' Office
 Office: (360) 786-5440
 Cell: (360) 463-1169

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 11, 2021 2:54 PM
To: County_Commissioners <County.Commissioners@co.thurston.wa.us>
Subject: Beaver Creek Land Use Amendment

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **the Thurston County Commissioners**

Subject:

From: **Kathleen Snyder**

Email (if provided):

Phone: (if provided):

Message:

I am opposed to the rezone of any more rural property to permit industrial uses. Thurston County has more warehouse space, both actual and being developed, than is healthy both environmentally and economically.

You are seeing our retail malls becoming underutilized and abandoned all over the country. The use of on-line shopping is the main thrust of this change. As sure as the sun rises each morning, something will affect on-line shopping in the future. I suspect it will be advancement of 3D printing technology.

When this happens, do we want these huge mega-warehouses all over our landscape sitting empty? It makes more sense to keep the land open for carbon capture, agriculture, and recreation for a growing population. Thurston County has more than its fair share of warehouses. Let's keep it at what we have. Thank you.

Maya Teeple

From: County_Commissioners
Sent: Thursday, March 11, 2021 3:17 PM
To: Maya Teeple
Subject: FW: Beaver Creek

Public comment. Thank you!

Katey Johnson

Executive Assistant to County Manager Ramiro Chavez
 Thurston County Commissioners' Office
 Office: (360) 786-5440
 Cell: (360) 463-1169

From: Amy Stottlemeyer <amystottle@gmail.com>
Sent: Wednesday, March 10, 2021 3:11 PM
To: County_Commissioners <County.Commissioners@co.thurston.wa.us>
Subject: Beaver Creek

Dear Meija, Edwards, and Mesner,

I do not support changing the zoning of the Beaver Creek 390 acres in rural Thurston County from Rural Residential Resource 1 unit per 5 acres to Rural Resource Industrial. I am writing to ask that you oppose changing the zoning to allow a warehouse fulfillment center at the freeway exit for Millersylvania, Exit 95. Land should not be able to be rezoned from RRR 1/5 all the way to RR Industrial. We need protections as citizens that land will not be rezoned 16 or 17 steps. People buy their land and look at the zoning to assure that they are buying in character keeping with the county. Allowing this allow more future warehouses and traffic to destroy the rural character of our county.

There is no need for a warehouse fulfillment center at the freeway exit for Millersylvania, Exit 95. This new proposal will affect many of the same county roads and neighborhoods as the NorthPoint project that was rejected by the BoCC after intense community involvement. As pointed out previously during the Northpoint discussion, these facilities often cost more to taxpayers than they generate due to excessive road destruction. In addition, there is already millions of warehouse space available. We do not want to be Kent. In addition, studies show these fulfillment centers have the highest traffic numbers of any warehouse type, and involve many semi-trucks as well as countless smaller vehicles crisscrossing our neighborhoods (destroying county roads at huge costs -- look at Elway) . Protect our county from blanket industrialization.

Please respect the character of our county and previous zoning guidelines.

Sincerely,

Amy Stottlemeyer

.....

.....

Maya Teeple

From: Lisa Ornstein <lisa.ornstein@icloud.com>
Sent: Friday, March 12, 2021 9:37 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Dear Ms. Teeple,

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

This rezoning request runs contrary to the No Net Loss Goal. There are 300 acres of farmland on the land proposed for rezoning. If those 300 acres were to be reclassified as Rural Resource Industrial (RRI), this land could no longer be farmed as farming is not an expressly permitted in a RRI zone. Loss of this farmland is contrary to the stated No Net Loss of Farmland goal.

The bar must be high when parties ask the county to trade one zoning designation for another. The landowner's request documentation needs additional work to meet that high bar. The BoCC should ask for additional responsive statements. For example:

- o The landowner states that current Rural Residential Resource 1-5 zoning (RRR 1-5) is inappropriate because it is near the interchange. On the contrary, being near a railroad and the interchange is a benefit for the dairy farm given that the farm brings in feed in large quantities and needs to accommodate the daily or every other day mail truck.
- o When asked what conditions changed that now make RRR 1-5 zoning less appropriate than the proposed RRI (industrial) zoning, the landowner does not talk about condition changes for farms, forestry, and housing. No information is given to suggest the current zoning is now less viable than when the land was first zoned.
- o When asked how the rezone would impact surrounding land use, the landowner states that homeowners would see "adequate buffers." That is not responsive to the question of impact on surrounding farms, forestry, or housing.

I would appreciate your response to my raised concern.

Thank you!

Lisa Ornstein
 3010 28th Ave. SE
 Olympia, WA 98501

Maya Teeple

From: County_Commissioners
Sent: Friday, March 12, 2021 9:43 AM
To: Maya Teeple
Subject: FW: Beaver Creek Land Use Amendment

Public comment. 😊

Katey Johnson

Executive Assistant to County Manager Ramiro Chavez
 Thurston County Commissioners' Office
 Office: (360) 786-5440
 Cell: (360) 463-1169

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 11, 2021 11:12 PM
To: County_Commissioners <County.Commissioners@co.thurston.wa.us>
Subject: Beaver Creek Land Use Amendment

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: the Thurston County Commissioners

Subject:

From: May O'Hara

Email (if provided): tmsssohara@gmail.com

Phone: (if provided):

Message:

I am writing against the rezone of the 390 acres of farmland next to Beaver Creek to industrial use. We live in Maytown and do not want to lose our rural way of life to another warehouse that will generate more traffic, chaos, and destruction to this area. There is enough commercial development taking place just down the road at exit 99. Enough is enough! I am sure there are empty warehouses in Thurston County that can be utilized instead of building more here. Please protect and preserve our rural south county area.

Sincerely,

Tim and May O'Hara

Maya Teeple

From: Judy Konopaski <judyleekonopaski@gmail.com>
Sent: Friday, March 12, 2021 10:29 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Judith (Judy) Konopaski from Lacey,98503-2540

Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, March 12, 2021 2:16 PM
To: Maya Teeple
Subject: The Beaver Creek Land Use Ammendment

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Maya Teeple**

Subject:

From: **Paul Southworth**

Email (if provided): **48empire@gmail.com**

Phone: (if provided): **360 402-0065**

Message:

The proposed rezoning of 390 acres in rural Thurston County on Case Road near Exit 95/Maytown from rural residential 1 unit per 5 acres to rural resource industrial would ruin the rural character of the area and our community. The proposed warehouse fulfillment center would bring much traffic including many semi-trucks, box trucks, countless smaller vehicles crisscrossing our neighborhoods possibly 24 hours per day. All that traffic would impede the residential traffic that uses exit 95.

We own and live on a 21 acre parcel which is partially adjacent to the 390 acres. Beaver Creek runs through the 390 acres as it also runs through our property. In our 30 years of living here, we have seen many salmon runs in the creek, native fish, otters and beaver. The Beaver Creek area is habitat for the Oregon spotted frog, an animal protected under the Endangered Species Act. It is a very sensitive wildlife area and we should manage our natural resources responsibly for the benefit of present and future generations. Industrial development would surely put that in danger.

We just went through an intensive docketing process to prevent the rural character around Millersylvania State Park from being transformed into a 3 million square foot logistics center. This new proposal will affect many of the same county roads and neighborhoods as that NorthPoint project that was rejected by the BoCC after intense community involvement. Studies show that fulfillment centers have the highest traffic numbers of any warehouse type.

Please consider the residents around this proposed rezoning. We live here because we enjoy the rural way of life and the acreage surrounding our homes. This proposal would put industry as our neighbor and open the door for more industrial projects. That is absurd! This new project would destroy our way of life and would definitely be a betrayal to our residents and community.

Thank you for considering all these facts.

**Paul & Sally Southworth
4737 Maytown Rd SW
Olympia, Wa 98512**

**Paul: 360 402-0065 48empire@gmail.com
Sally: 360 402-6741 saddlebumsal@gmail.com**

Maya Teeple

From: PEGGY SMITH <rpps4u@comcast.net>
Sent: Friday, March 12, 2021 5:04 PM
To: Maya Teeple
Subject: Comment on Proposed Amendments to 2020-2021 Official Dockets

Greetings,

I am writing to express my opinion that the Beaver Creek: Land Use Plan and Rezoning Amendment proposal **not be added** to the 2020-2021 Official Docket.

Having this proposal added to next year's docket is a reasonable approach. In addition, it will allow for further consideration of the County's efforts to protect farmland. This will provide a stronger foundation for consideration of the rezoning request.

Thanks you,

R Peggy Smith, Olympia, WA

Maya Teeple

From: Elizabeth Sanders <elizsanders@yahoo.com>
Sent: Friday, March 12, 2021 5:49 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

1 .The County Does Not Need Additional Rural Resource Industrial Land 2. More Details Needed on Warehouse Plans 3. Rezone Actions Must Not be "Spot Zoning 4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts 5. Request Revised Request Documentation

Thank you,

Elizabeth Sanders from Olympia,98502

Maya Teeple

From: Bob Clark <rdclark147@gmail.com>
Sent: Saturday, March 13, 2021 8:47 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Robert Clark from Olympia,98506

Robert (Bob) Clark
rdclark147@gmail.com

Maya Teeple

From: Christy White <wc6517@scattercreek.com>
Sent: Sunday, March 14, 2021 1:24 PM
To: Maya Teeple
Subject: Opposition of rezoning Beaver Creek to Rural Resource Industrial be placed on Docket

Hello Maya and Planning Department,

I am opposed to this rezoning.

1) This rezoning could have significant impact on Beaver Creek. Beaver Creek is a tributary to the Black River and drains the east side of the river basin, including Scott and Deep Lakes. It has extensive wetlands associated with it. As of November 2016 the Thurston County Public Health and Social Services Department, Environmental Health Division and Thurston County Resource Stewardship Department, Water Resources Division declared the water had declined and was listed as only Fair.

2) The pollution and toxic substances from a warehouse or other industrial business would only add significant toxins to the lands and water sources connected with Beaver Creek.

3) Step outside the box, support with tax credits etc. to keep lands agriculture and at a minimal environmental impact. There are other options besides rezone to make a sale.

4) The cost is also extensive. At a minimum .50 FTE is needed by the Planning Department for this request. Rural Thurston County does not need another warehouse.

5) Applicant request to amend land use designation and zoning of several parcels SE of Maytown/I5 interchange from Rural Residential Resource 1 Unit per 5 acres (RRR 1/5) to Rural Resource Industrial (RRI). Adjacent to RRI (to the NE). Site owned by Beaver Creek Farm, LLC. Applicant goal is industrial park (warehouse/distribution center). RRI zoning would allow a variety of industrial uses. Beaver Creek runs through property. Site is currently in ag use and enrolled in Current Use-Ag tax program. What is so lacking in our current resources for warehouses that could justify this re-zone? What kind of warehouse on this location could possibly be so valuable to local agriculture support as defined by the code below?

20.29.010 - Purpose.

The purpose and intent of the rural resource industrial district is to provide areas where industrial activities and uses that are dependent upon agriculture, forest practices and minerals may be located.

The district also allows such uses that involve the processing, fabrication, wholesaling and storage of products associated with natural resource uses. The standards in this chapter are intended to protect the rural area from adverse industrial impacts. All industrial uses must be functionally and visually compatible with the character of the rural area.

Controls to provide freedom from nuisance-creating features such as noise, dirt, odor, vibration, air and water pollution, are established together with adequate traffic circulation, buffers and landscaping requirements, to establish compatibility with surrounding rural development and offer protection from industrial blight and impacts.

Thank you for your review of my comments.

Christy White

Delphi Valley

Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Friday, March 12, 2021 4:54 PM
To: Maya Teeple
Subject: Beaver Creek Land Use Amendment

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Maya Teeple**

Subject:

From: **Michele Boderck**

Email (if provided): **mboderck@yahoo.com**

Phone: (if provided): **845-417-1182**

Message:

I am writing in opposition to add the proposal of the Beaver Creek Land Use Amendment to the docket. We should be doing everything we can to protect our local farms, not rezoning them out of existence for more unnecessary warehouses. South Thurston County is valued for its rural communities and this does not align with our values. Although the dairy farm may also be impacting the salmon-bearing stream, surely an industrial warehouse will not be an improvement. Many residents, including myself, are already unhappy with all of the development happening on 93rd, the last thing we need is more of it so nearby. Thank you for your time.

Maya Teeple

From: Jennifer Johnson <22jjen@gmail.com>
Sent: Monday, March 15, 2021 1:20 PM
To: Maya Teeple
Cc: JJ Eml
Subject: Zoning at the Beaver Creek Dairy Farm

Dear Maya,

Please share my plea to the Thurston County Board of Commissioners to refuse the following rezone application that would allow the building of a large warehouse/distribution center by rezoning to Rural Resource Industrial.

A proposal is being made to change the zoning at the Beaver Creek Dairy Farm adjacent to I-5 exit 95 from Rural Resource (RR) to Rural Resource Industrial (RRI).

Please do not fast-track this ahead of other comprehensive amendments already on the docket.

A large warehouse complex and its parking at the Beaver Creek Dairy site would involve extensive impervious surfaces from buildings and parking lots (perhaps millions of square feet). Lights, truck traffic, and noise would drastically interfere with the migration of wildlife.

Coho salmon migrate through the property to spawn in the creeks of West Rocky Prairie, upstream from Beaver Creek Dairy property. Impervious surfaces will increase flooding downstream of the proposed sites. High waters can be substantially detrimental to migrating Coho salmon. Toxic spills and runoff could cause water quality degradation in Beaver Creek.

Every part of nature feeds the whole of nature which we humans are also part of. Every time we disrupt the web of nature, we ultimately cause harm to ourselves. I understand the need for industry and growth and I believe there are ways to plan for this that are minimally disruptive of the natural environment which gives us so much, economically, recreationally, culturally, and spiritually.

Thank you very much for considering my concerns.

Sincerely,
Jennifer Johnson (Thurston County resident)

Maya Teeple

From: Lisa Ceazan <lisajonc@gmail.com>
Sent: Monday, March 15, 2021 11:44 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

Farmland must be preserved in Thurston County!

In addition:

1. The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning"
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts. **Delay the Beaver Creek request to the 2022 Docket.**
5. Request Revised Request Documentation

Thank you,

Lisa Ceazan
Olympia, 98506



March 15, 2021

To: Thurston Board of County Commissioners
From: Thurston Conservation District
Re: Rezone Request for Beaver Creek Dairy

On behalf of the Thurston Conservation District Board of Supervisors, I am writing you to strongly suggest that you not consider adding the Beaver Creek Dairy Farm rezoning request to the 2021 planning docket. We believe that adding this request to the 2021 docket is problematic for a variety of reasons, as outlined below.

First and foremost, converting this parcel to a non-agricultural use is inconsistent with the county-wide goal of no net loss of farmland. Over the past 75 years Thurston County has lost more than half of its farmland, and the pace of farmland loss has actually accelerated in recent years. As a region committed to agricultural vitality and a more sustainable local food system we simply cannot allow additional farmland to be converted to non-agricultural loss without extremely careful consideration.

Second, concern over the rapid pace of farmland loss, as well as other factors, resulted in the county approving a community driven review of agriculture as part of its 2021 docket. This project is currently underway, and it would be premature to move forward with a consideration for rezoning prior to the completion of this project. The results of the community driven review of agriculture will provide critical information to help the county decide on the merits of this proposal, and other future rezone requests.

Third, the county does not need additional Rural Resource Industrial (RRI) land. According to the most recent buildable lands survey completed by the Thurston Regional Planning Council (TRPC), Thurston County has sufficient land already available to meet the needs for RRI land for at least the next 20 years.

Finally, while Beaver Creek parcel is enrolled in the current use agriculture tax program, it is true that the underlying zoning of the parcel offers no-long term assurance that the land will remain in agricultural use. We are optimistic that the community driven review of agriculture currently underway will identify opportunities that would allow us to protect lands such as this for agricultural use in the long term. While moving forward with a rezone at this point might ensure that the parcel would not be developed at residential densities, a rezone to RRI would almost certainly preclude ongoing agricultural activities on the property.

The Thurston Conservation District is committed to working with our public and private partners to ensure the protection of existing farmland and environmentally sensitive properties, and to expanding



the robust and growing role of agriculture within the county's economic development plans. Prematurely considering a rezone of the Beaver Creek property, without good data or a compelling rationale, threatens to undermine these important objectives.

Thanks for your consideration, and please don't hesitate to contact me if you have any questions or need additional information.

Sincerely,

TJ Johnson, Chair
Thurston Conservation District

Maya Teeple

From: Gerald C <breitenseer@hotmail.com>
Sent: Monday, March 15, 2021 4:17 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.
Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,
Gerald Cichlar, Olympia, 98502

Sent from [Mail](#) for Windows 10

Maya Teeple

From: Lynne Holz <lynneholz@comcast.net>
Sent: Monday, March 15, 2021 5:00 PM
To: Maya Teeple
Subject: Redone

Please do not rezone the land near the Beaver Creek dairy farm. It would be a shame to lose a beautiful natural setting as well as impacting the wildlife in that corridor . So much of our county has been damaged by ugly warehouses and distribution centers let's save something lovely instead of thinking money and growth all the time.
Thank you,Lynne Holz, a Thurston county resident

Sent from my iPad

Maya Teeple

From: Philip Pearson <philip_pearson@yahoo.com>
Sent: Tuesday, March 16, 2021 6:24 AM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm - Rezoning

Please do not rezone the Beaver Creek Dairy Farm which would allow still more large warehouses in Thurston County. This farmland is too valuable. thank you.

Philip L. Pearson
Lacey
Philip_pearson@yahoo.com

Sent from my iPad

Maya Teeple

From: B Fug <cool50ga@live.com> on behalf of B Fug <bettyfug@aol.com>
Sent: Monday, March 15, 2021 8:47 PM
To: Maya Teeple
Subject: Rezoning

Good Evening:

I wish you to understand I am a resident since 1992 of Olympia. I became aware that someone is applying for a rezoning of Beaver Creek Dairy Farm near I-5. I object to this prime farm land being rezoned so that an industrial warehouse distribution center can be built. This developer should go to other areas on the I5 corridor to build. Building there would affect wildlife and water flow of the creek; therefore affecting the environment. I am sure that the warehouse can find other suitable sites maybe even update an existing building and thereby save some precious resources. Thank you for your time.

Respectfully,
Betty Fugazi

Sent from [Mail](#) for Windows 10

Maya Teeple

From: Tali <watermantali@gmail.com>
Sent: Tuesday, March 16, 2021 5:53 AM
To: Maya Teeple; tali waterman
Subject: Beaver Creek Rezoning issue

Hello and thanks for taking my comment.

I'm writing to ask the Thurston County Board of Commissioners to refuse the rezoning application for the Beaver Creek Dairy Farm. My hope is that the area would continue to receive protection from the Growth Management Act, and that the current wildlife corridors be protected from industrial development.

Thanks very much.

Tali Waterman
360-790-4437

Maya Teeple

From: karol.erickson@comcast.net
Sent: Monday, March 15, 2021 9:18 PM
To: Maya Teeple
Subject: Please reject the rezone application for Beaver Creek Dairy Farm

Please reject the rezone application for Beaver Creek Dairy Farm near I-5, exit 95 from Rural Resources (RR) to Rural Resource Industrial (RRI).

This zoning request should not be fast-tracked ahead of other comprehensive amendments already on the docket.

This property is valuable working farmland that should be preserved. It is also an “unofficial” wildlife corridor according to Conservation Northwest that runs from Capitol Forest in west Thurston along and around Beaver Creek, under I-5 at exit 95, then over to West Rocky Prairie Preserve, and onto to JBLM in east Thurston County. This route allows animals to avoid crossing the pavement of I-5. Any large warehouse complex and its parking at the Beaver Creek Dairy site would involve extensive impervious surfaces from buildings and parking lots. Lights, truck traffic, and noise would drastically interfere with the migration of land mammals, from elk to weasels, as well as birds on aerial pathways.

Beaver Creek is also an Aquifer Recharge Area with Coho Salmon. Beaver Creek and its wetlands are critical areas protected under the Growth Management Act. Creek buffers would be required with industrial development, but even if expanded beyond required widths, buffers would likely be inadequate protection from a huge industrial site. Thousands of acres of conservation lands that protect prairie and wildlife habitat have been established along or near the Black River downstream and west of the dairy property. They include the Black River National Wildlife Refuge (wetlands and riparian areas), Mima Mounds Natural Area Preserve, Glacier Heritage (a County Prairie Park), and many Capitol Land Trust sites. Millersylvania State Park is a few miles to the east. Coho Salmon migrate through the property to spawn in the creeks of West Rocky Prairie, upstream from Beaver Creek Dairy property. Impervious surfaces will increase flooding downstream of the proposed sites. High waters can be substantially detrimental to migrating Coho salmon. Toxic spills and runoff could cause water quality degradation in Beaver Creek.

Because of these many environmental concerns, please reject the re-zoning application.

Thank you,

- Karol Erickson, Thurston County resident

Maya Teeple

From: Marlene Westhoff <lmwesthoff57@gmail.com>
Sent: Monday, March 15, 2021 8:53 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,
Lyle Westhoff
Olympia
98512

Maya Teeple

From: Patty May <greenergrad79@gmail.com>
Sent: Monday, March 15, 2021 7:32 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Dear Maya

I'm writing to you because I am in favor of farmland preservation.

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

We must be more proactive when it comes to environmental issues and that is excellent habitat for many birds. As an Audobonsociety member I am dedicated to protecting this habitat.

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Patty May
Olympia, Wa
98512

Maya Teeple

From: Cindy Fairbrook <fairbrook4432@icloud.com>
Sent: Monday, March 15, 2021 6:56 PM
To: Maya Teeple
Subject: Please refuse rezoning proposal

Please consider a rejection to the rezoning application for Beaver Creek Dairy Farm near I-5, exit 95. The zoning request is from Rural Resources (RR) to Rural Resource Industrial (RRI) and would allow building a large warehouse/distribution center.

This change would permanently remove valuable working farmland from agricultural use. In addition, BHAS has concerns about both the wildlife corridor under I-5 and Beaver Creek, which flows through the property.

Our wildlife is already suffering from loss of habitat. Please consider this when voting.

Thank you,
Cindy Fairbrook

Maya Teeple

From: Ann Hawkins <hawkann13@gmail.com>
Sent: Monday, March 15, 2021 6:35 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Ann Hawkins from Rochester wa.

Maya Teeple

From: Michele Burton <mburtonphoto@aol.com>
Sent: Monday, March 15, 2021 6:18 PM
To: Maya Teeple
Cc: Michele Burton
Subject: Beaver Creek Dairy re-zone

Greetings,

I am writing in opposition to the Beaver Creek Dairy re-zone.

The area to the west of Interstate 5 between Maytown and Rochester is vital for the environmental health of our County. It is a transition area between the forested north and the vanishing prairie habitat around Grand Mound. This area of Thurston County is home to many imperiled species, including the Bluebird and Taylor's Checkerspot butterfly. It is in the largest corridor of Oregon Spotted frog habitat in Western Washington.

Increased traffic from warehouses and industrial uses would not only degrade the environment in this part of the County, but would also put animals using the wildlife corridor in peril.

Of even more significance is the loss of agricultural land in Thurston County. We should be preserving farm land, not converting it to industrial use. While Thurston County has seen a growth in both farm-to-table local agriculture and agritourism, the amount of farmland is rapidly decreasing. Residents of Olympia, Lacey, Tumwater, Thurston and Lewis Counties want locally produced food. We should be encouraging farm land, not converting it to industrial use.

Thank you for considering my opposition to the Beaver Creek Dairy re-zone.

from [Washington State Extension website](#):

Thurston County's farmland is rapidly disappearing. Between 2002 and 2007, the acreage of actively farmed land has dropped nearly in half – from 74,420 acres to 38,718 acres. Since the mid 1950s, when Thurston County was primarily farmland, the County has lost over 75 percent of its working agricultural lands. Though the land area dedicated to agricultural activities has been steadily eroding, agricultural production is still of significant importance to the County's economy. The total market value of agricultural production in Thurston County is about \$118 million from 1,288 farms, with crops accounting for approximately 42% of the total and livestock and poultry the remaining 58% (U.S. Census of Agriculture). These figures are greater than that of all adjacent counties.

from the [Thurston County Comprehensive Plan](#) draft version:

"Preserving agriculture land is especially important because approximately 14,388 acres (nineteen percent) of farmland was converted to other uses from 2012 to 2017."

"Preserving agricultural lands is a priority because Thurston County has lost over 75 percent of its working agricultural lands since the mid-1950s"

"The rural economy is a key contributor to the tourism economy. Increased access and marketing of the amenities and destinations in rural Thurston County has strengthened agritourism. The farming community has developed many craft items such as beer, wine and

spirits to draw visitors. Other farms have developed onsite shops and U-Pick programs. The Thurston Bountiful Byway, established in 2014 by the Thurston County Board of Commissioners, is a guide for the exploration of many rural destinations including trails, parks, art galleries, craft farms, historic destinations, farms, wildlife sanctuaries and bed and breakfasts. Local rural businesses have tapped into the increasing consumer demand for quality, organic and locally-produced goods. This consumer demand is especially relevant for farms and other craft goods because 43 percent of visitor spending in Thurston County was for food service or food stores.¹⁵ In this way, the rural character of the County directly contributes to the economic health of the County.

Thurston County is well suited for this intimate agritourism experience because roughly 45 percent of farms are less than 10 acres.¹⁶ Smaller, rural residential farms are 8.7 percent more likely to offer agritourism than larger, non-family farms. Agritourism is worth exploring because local commercial agriculture accounted for almost 15 percent of the County's land use and produced over \$120 million worth of farm products a year in 2012."

Michele Burton
mburtonphoto@aol.com
(206) 910-2781
www.micheleburton.com

One Nation - indivisible - with Liberty and Justice for ALL

Maya Teeple

From: Greg Bargmann <gbargmann@aol.com>
Sent: Monday, March 15, 2021 6:14 PM
To: Maya Teeple
Subject: Opposed to rezoning of the Beaver Creek Dairy Farm

I am writing to request the Thurston County Board of Commissioners to reject the proposal to rezone the Beaver Creek Dairy Farm. The farm is located in one of the most rural area of the county and if the rezone is approved the quality of life in the County would decline; not just on the rezoned land but also on adjacent land due to increased traffic, increased noise and potential impact on water quality. I see no reason for this proposal to be expedited think it should take its normal place in line along with other proposals for rezoning

Thanks for you consideration of this request.

Greg Bargmann

Maya Teeple

From: David Mudd <cougfans@comcast.net>
Sent: Monday, March 15, 2021 5:39 PM
To: Maya Teeple
Subject: Proposed Rezone of Beaver Cr Dairy Farm

I am a certified wildlife biologist with over 32 years of experience. I have resided in Thurston County since 1982 and have seen the loss of parcel after parcel of open space/wildlife habitat. Please reject the proposed rezone for Beaver Cr Dairy Farm from Rural Resources to Rural Resources Industrial. We need to retain the farmland, open space, and wildlife habitat that we have. We do not need to build another distribution warehouse on the small amount of farmland that we have. Thank you, David Mudd

Maya Teeple

From: Jeanne Miller <jamiller_studio@hotmail.com>
Sent: Monday, March 15, 2021 5:21 PM
To: Maya Teeple
Subject: Please reject Beaver Creek Dairy Farm re-zoning application

Dear Thurston County Board of Commissioners,

Farmland and open land for wildlife is too precious to be paved over for warehouses and associated parking lots. As a resident of Olympia, I am asking you to please reject the rezone application for Beaver Creek Dairy Farm. Please preserve our remaining rural landscapes!

Thank you.

Sincerely,

Jeanne Miller

1916 Arietta Ave SE
Olympia, WA 98501
(360) 456-3857

Maya Teeple

From: Jeff Sowers <jeff@thurstondemocrats.org>
Sent: Monday, March 15, 2021 5:19 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

Jeff Sowers from Olympia 98506

Maya Teeple

From: Valerie Hammett <valerie.hammett@gmail.com>
Sent: Tuesday, March 16, 2021 9:44 AM
To: Maya Teeple
Subject: No to rezone Beaver Creek Dairy

Dear Commissioners,

Please do not rush zoning changes that turn farmland into warehousing.

Thank you, Valarie Hammett

--

Valerie

Maya Teeple

From: Shari Silverman <silverman.shari@gmail.com>
Sent: Tuesday, March 16, 2021 10:01 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Hi,

As a constituent I ask that the Commissioners not change the current docket by adding the 400 acre dairy called 'Beaver Creek Dairy'.

Please defer this rezoning change until the next 2022 docket is considered.

Right now the Agricultural Policies and Practices are under both staff and community review. This review should be completed before rezoning is considered.

Thank you,

Shari Silverman
Tumwater

Maya Teeple

From: SUE RUDISILL @ MIKE STAPLETON <stapleton23@q.com>
Sent: Tuesday, March 16, 2021 11:06 AM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm

To Whom It May Concern:

I am writing to ask the Thurston County Commissioners to reject the rezone application for Beaver Creek Dairy Farm near I-5, exit 95. This zoning request changes this site from Rural Resources (RR) to Rural Resource Industrial (RRI) and would allow building a large warehouse/distribution center.

This change would permanently remove valuable working farmland from agricultural use. It would negatively impact not only the needed wildlife corridor under I-5 but also, Beaver Creek, which flows through the property.

It is time for the Commissioners to prioritize protecting such ecosystems over business decisions; the land, corridor and waterway are far more valuable, more precious than another warehouse, which can be built in another area where it will have less impact on the environment.

Thank you for your consideration of this issue.

Sincerely,

Dr. Amanda Sue Rudisill
P.O. Box 13195
Olympia, WA 98508

stapleton23@q.com

Maya Teeple

From: Linden Bentley <benticott@yahoo.com>
Sent: Tuesday, March 16, 2021 11:00 AM
To: Maya Teeple
Subject: REJECT Beaver Creek Dairy Farm change from Rural Resource (RR) to Rural Resource Industrial (RRI).

Thurston County Commissioners,

I am writing to oppose the rezone from Rural Resource to Rural Resource Industrial for the property Beaver Creek Dairy Farm (13333 Case Rd. SW, Olympia, and 5 miles south of Tumwater's Urban Growth Boundary). I ask you to refuse the rezone application. This zoning request should not be fast-tracked ahead of other comprehensive amendments already on the docket.

My reasons for this opposition include the following considerations. Conservation Northwest, the non-profit organization that helped develop the Snoqualmie I-5 Wildlife Corridor, believes that the area between milepost 93 and milepost 98 of I-5 is a valuable wildlife corridor area, with the I-5 underpass at exit 95 an important crossing location. Thousands of acres of conservation lands that protect prairie and wildlife habitat have been established along or near the Black River downstream and west of the dairy property. They include the Black River National Wildlife Refuge (wetlands and riparian areas), Mima Mounds Natural Area Preserve, Glacier Heritage (a County Prairie Park), and many Capitol Land Trust sites. Millersylvania State Park is a few miles to the east. I could site more cogent arguments that must be considered over a period that allows for investigation as is warranted by the potential harm that may occur. Please reject the re-zoning application.

Linden Bentley
3707 Wesley Loop NW
Olympia, WA

Maya Teeple

From: Judy Olmstead <olympiajudy9@gmail.com>
Sent: Tuesday, March 16, 2021 11:42 AM
To: Maya Teeple
Subject: Rezone application for Beaver Creek Dairy Farm

Hello from Judy Olmstead,

I reside here in Thurston County in Olympia. I'm writing to urge the Commissioners to reject the rezone application for Beaver Creek Dairy Farm. Working farmland is important to the health of our community, and the wildlife corridor under I-5 and Beaver Creek would be negatively affected. Thank you for rejecting this applicaton.

Maya Teeple

From: Nancy Peterson <nancydave@icloud.com>
Sent: Tuesday, March 16, 2021 12:17 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

1 .The County Does Not Need Additional Rural Resource Industrial Land 2. More Details Needed on Warehouse Plans 3. Rezone Actions Must Not be "Spot Zoning 4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts 5. Request Revised Request Documentation

I am not nearby resident but as a resident of Thurston County I am very concerned with maintaining a strong rural- farm and forested areas. These area must be protected and preserved for the overall health of the area.

Thanks so much,

Nancy Peterson 98503

Maya Teeple

From: Elizabeth Rayburn <elizabethrayburn@me.com>
Sent: Tuesday, March 16, 2021 12:41 PM
To: Maya Teeple
Subject: Rezone application

Please refuse rezoning I-5 Exit 95.
Enough warehouses.

Sent from my iPhone

Maya Teeple

From: Jennifer Garlesky <jenniferann18@hotmail.com>
Sent: Tuesday, March 16, 2021 12:23 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Hi Maya Teeple:

I am writing to encourage you to delay changing the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

As a Thurston County resident since 2013 have witnessed the changes in land use and one of the biggest concerns I have is the impact to our farmlands. This land is very valuable and must be retained in the state that it currently is in and does not need to change zoning to industrial land.

Furthermore if you choose to move forward there needs to be more review on the plans for the warehouse facility, an impact statement to the surrounding region and a community driven review of county's current agricultural policies and practices.

Thank you,

Jennifer Riedmayer, Olympia, 98501

Maya Teeple

From: Kathy <kmhaviland@fastmail.com>
Sent: Tuesday, March 16, 2021 2:30 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

I am in full support of doing everything possible to preserve working farmland in our county.

I am opposed to the rezone application for Beaver Creek Dairy farm.

In addition, to removing land permanently from agricultural use, the rezone would affect the wildlife corridor under I-5 and Beaver Creek.

Again, I am 100% opposed to this application for rezoning.

Thank you,

Kathy Haviland
Olympia, WA 98502

Maya Teeple

From: VQL <vqlegg@gmail.com>
Sent: Tuesday, March 16, 2021 4:01 PM
To: Maya Teeple
Subject: Rezone application for Beaver Creek Dairy Farm near I-5, exit 95.

Please deny the application for rezoning from farming to industrial at this location because of the growing importance of maintaining wildlife in fragile ecosystem environments. Blocking or demolishing the wildlife corridor and losing increasingly necessary local farming land endangers all of us and those who follow us as climate change continues to challenge our ability to thrive and survive in an environment already causing considerable disruption to wildlife and human life.

Thank you,
Victoria Q Legg
Olympia, WA

Maya Teeple

From: doron <doron@swcp.com>
Sent: Tuesday, March 16, 2021 4:35 PM
To: Maya Teeple
Subject: Opposed to Rezoning Beaver Creek Dairy Farm for Industrial Uses

Hello Thurston County Board of Commissioners,

I am writing in opposition to the proposed rezoning of the Beaver Creek Dairy Farm.

This property is valuable working farmland, protected by the Growth Management Act for a very good reason. If we persist in ignoring all indicators of ecological decline by authorizing continued industrial development of farm and dairy land, severe damage, as has already been documented to occur when this type of change is facilitated, will be generated.

There are many reasons to oppose this rezoning but I will just mention two:

Beaver Creek is an Aquifer Recharge Area with Coho Salmon. Creek buffers would be required with industrial development, but even if buffers are expanded, they would likely be inadequate protection from an industrial site.

Precedent for more warehouses when there currently are at least 3 warehouses in Lacey and two more are planned there. This decision will set a precedent for developing warehouses from Capitol Highway to Grand Mound and would be in the heart of conserved lands in Thurston County.

Do not rezone this land!

Thank you,

Lori Doron
1418 Mitchell Ave. NE
Olympia, WA 98506

Maya Teeple

From: Kyle Leader <kchuckles11@yahoo.com>
Sent: Tuesday, March 16, 2021 6:27 PM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm Rezoning

Good afternoon,

I am writing to ask you to reject the rezoning of the Beaver Creek Dairy Farm from a working farm to industrial center. Rejecting the rezoning will preserve not only the farmland, but the wildlife that depends on that habitat. Thanks for your time.

Kyle Leader
kchuckles11@yahoo.com

Maya Teeple

From: Kristin Blalack <purrlly5@gmail.com>
Sent: Tuesday, March 16, 2021 10:15 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

The County staff have a full schedule of planning work to review Agricultural Policies and Practices for 2020-21. I view this project as high priority and essential given the current rate of loss of farmland.

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

1 .The County Does Not Need Additional Rural Resource Industrial Land 2. More Details Needed on Warehouse Plans 3. Rezone Actions Must Not be "Spot Zoning 4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts 5. Request Revised Request Documentation

Thank you,
Kristin Blalack, from Olympia, 98506

Sent from my iPhone

Maya Teeple

From: Deb Petersen <debandchico@comcast.net>
Sent: Wednesday, March 17, 2021 10:08 AM
To: Maya Teeple
Subject: Beaver Cr Dairy Farm re-zone

Dear Thurston County Commissioner's,

I am writing to plead with you to NOT allow a re-zone of the Beaver Creek Dairy Farm. For so many reasons this re-zone is a terrible idea for our county that is exploding with development. The loss of more farmland, wildlife habitat, and rural areas in Thurston county, is turning the county into a congested, polluted, ugly area when it once held such beauty. Please consider the greater good and quality of life for the residents of Thurston county (including wildlife!) and the state, and not give in to pressure from industrial interests. Surely there is a more appropriate area for a large warehouse and distribution center. Destroying farm land, devastating a critical wildlife corridor, and installing a permanent threat for pollution to Beaver Creek and Black River is too great a loss for Thurston County.

Thank you,
Deborah Petersen, resident of Thurston County

Maya Teeple

From: Patricia Creighton <psmcreighton@hotmail.com>
Sent: Wednesday, March 17, 2021 9:57 AM
To: Maya Teeple
Subject: Protect Rural Thrston County

Maya,

I appreciate the views expressed by Sue Danver in 3/17 Olympian. Having moved here in 1970, I have been disappointed to see how rural areas have become built up. I do realize with more people living in Thurston County there has been the need for more dwellings. However, I do believe it is possible to retain appropriate farms, and to protect the need for positive water quality in those areas.

Grateful for your consideration,

Pat Creighton
360-786-8373

Maya Teeple

From: Larry Remmers <lremmersfarm@gmail.com>
Sent: Wednesday, March 17, 2021 10:28 AM
To: Maya Teeple
Subject: Beaver Creek Farm rezone request 390 acres

I have to yell out "DON'T DO IT!!" My neighbors and I want to keep the rural nature of south Thurston county. We don't want the land covered up with sprawling industrial sites and warehouses. Not to mention the environmental impact to animals and atmosphere. Please vote no to a rezone.

thanks,
Larry Remmers
Gate Rd., Oly

Maya Teeple

From: Anthony Aitken <professoraitken@gmail.com>
Sent: Wednesday, March 17, 2021 10:58 AM
To: Maya Teeple
Subject: Comments exit 95

No warehouse at exit 95 area.

Thanks!

Tony Aitken

Sent from my iPhone

Maya Teeple

From: Kelsea Jewell <kelseajewell@gmail.com>
Sent: Wednesday, March 17, 2021 11:38 AM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm re-zoning concerns

Good morning commissioner Teeple,

I have just learned about the proposed re-zoning of the Beaver Creek Dairy Farm area to industrial, and I want to voice my concerns over this possibility. I was born and raised in the Delphi Valley, and currently live just outside of Rochester, so I both travel through this area frequently and interact with the people and animals who rely on this area. I have also witnessed the rapid changes that have happened to northern Centralia due to the recent construction of a massive Unfi warehouse on Galvin Rd: loss of flood buffers, loss of wildlife habitat (I used to watch pheasants in that field, and destruction of local roads that were not designed to take heavy truck traffic.

The Beaver Creek Dairy Farm is important to our region as farming land, and is a part of our thriving local, sustainable efforts to produce food and offer employment to family-run businesses. The land itself is a haven for a large variety of wildlife, and converting this land to asphalt and featureless warehouses will both increase flood risks and decrease the broad impact and usefulness of this land.

Please help preserve our local agriculture and family farms.

Please do not support converting this land into parking lots and corporate warehouses.

Thank you for your time and consideration.

Sincerely,
Kelsea Jewell
10648 Langworthy Rd. SW
Rochester, WA

Maya Teeple

From: beastofsnergl@gmail.com
Sent: Wednesday, March 17, 2021 11:57 AM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy rezone

To whom it may concern,

I read recently about the proposed re-zoning of the property at 13333 Case Rd. SW in Olympia. I am writing to add my voice to those who recommend delaying and reconsidering the proposal.

My wife and I grew up in Thurston County, then moved away for school and work for many years. We chose to return to Thurston County (we now live near Rochester) in large part because of the vibrant agricultural nature of the county. Our area, our state, and our country are key food-producing regions of the world. Productive farmland is a critical resource, and abandoning it for a non-agricultural purpose from which it could not readily be returned is rarely a decision I would take or support. Please help protect the farmland that feeds us (as well as many others).

Sincerely,

Rembrandt Haft

Maya Teeple

From: jdemille@comcast.net
Sent: Wednesday, March 17, 2021 12:24 PM
To: Maya Teeple
Subject: Reject - Rezone application: Beaver Creek Dairy Farm

Hello - please REJECT the rezone application from Rural Resources. Do NOT allow a warehouse/distribution center to be erected at Beaver Creek Dairy Farm. Please let the Commissioners know, this is NOT what we want.

Thank you,
Jeanne DeMille

Sent from my iPhone

Maya Teeple

From: Lee Dyer <leeayn.dyer@gmail.com>
Sent: Wednesday, March 17, 2021 12:33 PM
To: Maya Teeple
Subject: Beaver Creek Farm

Dear Maya Teeple,

Please do not rezone Beaver Creek Farm. This rezoning action would damage the environment, compromise area wildlife, and degrade public experience at Millersylvania State Park.

Do we need more warehouses distributing imported goods or do we need quality locally grown food? As my farmer cousin says, "We'll all be eating dirt"!

Sincerely,

Lee Ayn Dyer

Maya Teeple

From: Carole Wahlers <roncw1616@gmail.com>
Sent: Wednesday, March 17, 2021 12:38 PM
To: Maya Teeple
Subject: Exit 95

Please let us add our voices in protest to the proposed rezoning of Beaver Creek Farm.

We can see so many reasons for not rezoning. For one, the wildlife carnage. We lived in South County for forty years, and we often took Exit 95 to go home. It sickens us to think of the suffering of the animals if there were to be even more development.

The wildlife don't vote. So we have to speak up for them.

Environmentally, the rezoning is just plain a bad idea. Does farmland have to be paved over? Must we have the equivalent of strip malls lining I-5?

Please tell the Thurston County Commissioners to vote NO to the request to rezone this 390-acre farm parcel from rural residential to rural resource industrial.

Thank you.

Carole and Ron Wahlers

Sent from my iPhone

Maya Teeple

From: Barbara Gross <bgrossintheworld@gmail.com>
Sent: Wednesday, March 17, 2021 12:27 PM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm rezoning

To the County Board of Commissioners and planners:

I am writing to ask that you vote NO to rezoning the Beaver Creek Dairy Farm from rural residential to rural resource industrial.

Industrial development will create more impervious ground cover, more light and noise pollution, more traffic, and will decrease the quality of life for both human and wild life living in that area. Our wildlife depends on the contiguous forested land along Beaver Creek to survive and thrive; our salmon need the water in Beaver Creek that comes from the absorbed groundwater.

Please do not fast track a vote on this matter that impacts the quality of life and the environment. Please remember that financial analysis in isolation does not work for the betterment of all, but only for a limited few.

Thank you.

Sincerely,

Barbara Gross

30 year resident of Thurston County

Maya Teeple

From: Blaine Snow <snowinolympia@gmail.com>
Sent: Wednesday, March 17, 2021 1:52 PM
To: Maya Teeple
Subject: Beaver Creek Dairy Farm

Dear Ms. Teeple,

I'm writing to ask you not to vote to rezone the Beaver Creek farm to rural resource industrial. Maintaining habitat for our wildlife and our salmon is most important to me and my family. We are lifelong, 5th generation residents of WA State.

Sincerely,
Blaine Snow
Olympia, WA

Maya Teeple

From: ROXANNE CHERRY <cherrynmir@comcast.net>
Sent: Wednesday, March 17, 2021 3:02 PM
To: Maya Teeple
Subject: Rezoning

I am asking the County Commison to reject the rezoing application for the Beaver Creek Dairy Farm. It's time to stop destroying our environment.

Maya Teeple

From: Pete Sutch <bethpete.sutch@gmail.com>
Sent: Wednesday, March 17, 2021 2:55 PM
To: Maya Teeple
Subject: Oppose rezoning of the Beaver Creek Farm

I am in opposition to the rezoning of the Beaver Creek Farm. I want our rural area to have a character that is more like Skagit County than Kent. I want our rural landscape to be a haven for wildlife and the natural environment alongside farmland. Please do NOT REZONE this parcel of 390-acre farm at Beaver Creek.

THANK YOU so much-

Beth Sutch

2906 Boundary ST SE

mobile: 360-915-4275

Maya Teeple

From: Lynn Bassett <bassett.lynnm@gmail.com>
Sent: Wednesday, March 17, 2021 4:52 PM
To: Maya Teeple
Subject: Delay the Beaver Creek Dairy Rezone

Please do not change the docket to add the 400 acre dairy called 'Beaver Creek Dairy'.

Points for the BoCC to consider:

- 1 .The County Does Not Need Additional Rural Resource Industrial Land
2. More Details Needed on Warehouse Plans
3. Rezone Actions Must Not be "Spot Zoning
4. The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts
5. Request Revised Request Documentation

Thank you,

[NAME] from [CITY],[ZIP]

Lynn Bassett Olympia 98501

Maya Teeple

From: Sandy Hallstrom <sandy@pjkh.com>
Sent: Wednesday, March 17, 2021 9:08 PM
To: Maya Teeple
Subject: Rezoning Beaver Creek farm

I want to comment that I am AGAINST rezoning the Beaver Creek farm to total resource industrial. We can't keep chipping away at nature and still have it function correctly (water systems, wildlife, etc.). Warehouses cover the land, create a funnel for heavy semi truck traffic and pollution, and create jobs that don't pay a livable wage or provide benefits. We must do better for our community.

-sandy
Sandra Hallstrom
3106 60th Loop SE
Olympia, WA 98501

Maya Teeple

From: Roger Yetter <rkyetter@comcast.net>
Sent: Thursday, March 18, 2021 6:25 AM
To: Maya Teeple
Subject: Rezone

Please say no to the rezone of our rural land in thurston county. We don't need more industrial pollution! Save our beautiful county's farmland and clean waters by voting no on this rezone. Thank you. Roger

Maya Teeple

From: Ryan O'Brien <ryanobrien360@gmail.com>
Sent: Thursday, March 18, 2021 10:07 AM
To: Maya Teeple
Subject: Beaver Creek Rezoning

As a resident of Littlerock I DO NOT want rezoning to allow for an industrial area! The reason I moved here was to enjoy nature and raise my family in a rural area.

Sincerely, Ryan O'Brien

Maya Teeple

From: Doug <dougbuster@hotmail.com>
Sent: Thursday, March 18, 2021 10:09 AM
To: Maya Teeple
Cc: Doug
Subject: Please REJECT the rezone application for Beaver Creek Dairy

Greetings:

I very much urge rejection of the rezone application for Beaver Creek Dairy Farm near I-5, exit 95.

It is extremely important to preserve farmland, as Thurston County is rapidly changing. The proposed rezone would allow large amounts of impervious surfaces, degrading the surrounding area's integrity as an aquifer recharge area.

The wildlife corridor along Beaver Creek and centered with the I-5 exit 95 is an important – and rare – opportunity for wildlife to cross I5 without crossing pavement. Obviously crossing freeway pavement is dangerous for humans in cars and trucks as well as dangerous for the wildlife.

Please help maintain the quality of life – for humans, wildlife and salmon by REJECTING the rezone application for Beaver Creek Dairy.

- Doug Buster, Olympia WA

Maya Teeple

From: Tom Terry <taterry45@comcast.net>
Sent: Thursday, March 18, 2021 11:30 AM
To: Maya Teeple
Subject: Rezoning of Beaver Creek Farm just west of Interstate 5

Hi Maya,

I would like to pass along my concerns for the proposed rezoning request for the 390-acre Beaver Creek Farm parcel that is west of Interstate 5 at the Millersylvania exist. Rezoning this property from rural residential to rural resource industrial could have a major negative impact on Beaver Creek that is a coho salmon bearing stream. Coho salmon are showing dramatic declines mainly to habitat loss, roadway pollutants that make it to the stream, and other factors

It is clear what industrial and urban development have done to degrade stream habitat for salmon wherever it occurs. Salmon stream habitat and industrial development are not compatible.

This area is also one of the few areas where wildlife can pass under I-5 without being exposed to high levels of traffic. Research has shown how critical these wildlife corridors are to maintain healthy wildlife populations. I-5 already is a major obstacle for movement of wildlife.

And as soon as one area gets rezoned Industrial the parcels next to it will likely become industrial, which will exacerbate the above issues.

Tom

Thomas A. Terry
5935 Swayne Rd. NE
Olympia, WA 98516
Home phone: 360-491-9417
Cell phone: 360-239-0270
e-mail: taterry45@comcast.net

Maya Teeple

From: Frank and Carol Sanborn <fascjs@yahoo.com>
Sent: Thursday, March 18, 2021 11:32 AM
To: Maya Teeple; County_Commissioners
Subject: The Beaver Creek Land Use Amendment - 390 Acres

Dear Commissioners,

We are so disappointed to hear of the proposal to rezone the 390 acre farm land in the Maytown area from rural residential to rural resource industrial. We live on the hill surrounded by this property and object to this proposal. We bought 8 1/2 acres on this hill in 1994 and built our dream home in 2002. We put a lot of work into our house and are good stewards of the land. We built here knowing there were other properties zoned industrial, but felt we were protected since the 390 acre dairy farm land is rural residential (one dwelling per five acres). We always knew the dairy farm would not be here forever, but had no idea that a giant warehouse would take its place.

There are seven properties on this hill ranging from 5 to 9 1/2 acres which is designated one house per five acres. That is why we bought the property knowing the land surrounding us was zoned rural residential and knew our investment was protected. Others on the hill bought their forever home. We have a wonderful little community on this hill and rezoning this land to rural resource industrial will change the wildlife and the whole eco system. There are wetlands surrounding us. What happens to those? We are also concerned about our property values going down.

Beaver Creek flows through the 390 acre property and will be affected by diesel and other pollutants draining from the warehouse development. It will affect our wells and possibly reduce our water supply. Our source of clean drinking water must be protected.

The increase in traffic will cause more problems. There are currently three trucking companies Freightliner, Old Dominion and CRST which already creates a lot of truck traffic and noise in this area.

Please take our comments into consideration and help protect our homes and this beautiful environment.

Carol & Frank Sanborn



Maya Teeple

Senior Planner

Thurston County Community Planning and Economic Development Department

2000 Lakeridge Dr. SW

Olympia, WA 98502

RE: Conservation Northwest's Comments on the Beaver Creek Land Use Amendment

March 17th, 2021

Thank you for the opportunity to provide comments on this important proposed land use amendment.

I am submitting these comments on behalf of Conservation Northwest (CNW) in opposition to the proposed land use change and subsequent development at Beaver Creek. CNW is a non-profit environmental group based in Seattle, Washington with staff located on the ground in the areas where we work, including Thurston and Lewis Counties. Our mission is to protect, connect and restore wildlands and wildlife from the Washington Coast to the British Columbia Rockies. We focus on recovering native species and ensuring they have ample habitat in the right locations to thrive in the face of the human footprint on natural landscapes, as well as climate change. Habitat connectivity is therefore a key piece of our work and has been since our founding in 1989. We have an organizational program dedicated specifically to connectivity between the Cascades and Olympics (<https://www.conservationnw.org/our-work/habitat/cascades-to-olympics/>), which is one reason why the impacts of the proposed land use change and subsequent development is such a concern for us.

I-5 is a major fracture point and barrier for wildlife and ecological processes, a problem made worse due to ever increasing development along its corridor. The places and opportunities that once existed to promote the movement of flora and fauna over and/or under I-5 have been disappearing over the last 40 years. Through our Cascades to Olympics program we have identified three remaining priority corridors that intersect with I-5 south of Olympia. The most northern of these corridors is what Conservation Northwest has labeled the "northern linkage" (figure 1), a network of small corridors that create a linkage across I-5, between the Grand Mound exit and milepost 99. Furthermore, there is a small network of protected stepping stones in the area with decent habitat, which includes state lands, agriculture, and forestry. The Beaver Creek-I-5 intersection has the potential to be part of a larger linkage that facilitates natural processes and wildlife movement.

Web and email

conservationnw.org
facebook.com/ConservationNW
info@conservationnw.org

Seattle headquarters

1829 10th Ave W, Suite B
Seattle, WA 98119
206.675.9747
206.675.1007 (fax)

Naturalness Corridors/Landscape Integrity and Proposed Rezoning Site

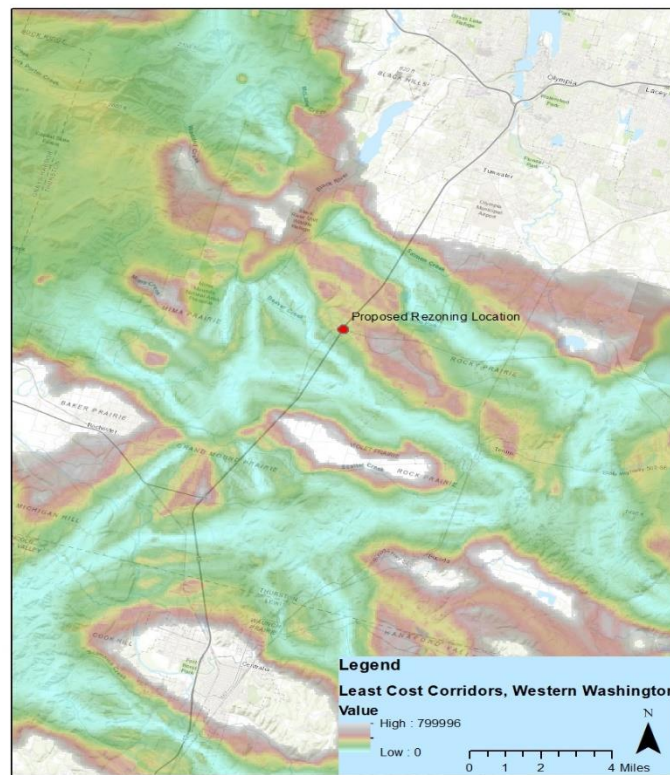


Figure 1. Red dot represents a rough estimate of the proposed land use amendment location (not exact). The two large corridors crossing I-5 constitute Conservation Northwest's "northern linkage". Map shows landscape integrity "naturalness" Least-Cost Corridors, which are shown ranging from least-cost of movement (Electric Blue), to extremely high cost to movement (Dark Gray), and to the extreme of impermeable landscape (areas absent a corridor). Note: model represents landscape integrity, which illustrates corridors of "natural" landscape, not specific habitat for any given species. Gallo, J.A., E.C. Butts, T.A. Miewald, K.A. Foster. 2019. *Comparing and Combining Omniscape and Linkage Mapper Connectivity Analyses in Western Washington*. Published by: Conservation Biology Institute, Corvallis, OR, <https://doi.org/10.6084/m9.figshare.8120924>

We would also encourage the county to consider how few options it has for climate change adaptation. Most wildlife have evolved to adjust to changes in the climate, however, for most of them, movement is the key. When species do not have connected habitat in order to seek climate refugia, change altitudes, or access protected areas, they are unlikely to be successful adapting to a changing climate. One thing the County can do to help protect wildlife and facilitate natural adaptation behavior is connecting landscapes and wildlife across I-5. We recommend including these types of adaptation guidelines into your future county plans. Moreover, the county should not seek to rezone land for development within these rare natural linkages that still exist. There is so little quality landscape integrity in the area that losing even a little more could have serious consequences for species as they navigate a landscape forever altered by anthropogenic development and climate change.

Web and email

conservationnw.org
facebook.com/ConservationNW
info@conservationnw.org

Seattle headquarters

1829 10th Ave W, Suite B
Seattle, WA 98119
206.675.9747
206.675.1007 (fax)



Conservation Northwest would also like to highlight two potential social impacts of letting this area become more developed. First, these types of zone changes have historically changed the character of entire communities that have been built over generations. This rezoning effort will hurt Thurston County's already shrinking rural communities, who deserve to have their way of life preserved. Second, rezoning this area will offer yet another opportunity for the most affluent entities to take the most desirable land and change landscapes and communities. Thurston County should consider how this rezoning and development could change the social landscape and who might be impacted.

In closing, we do not support the land use amendment change, nor do we support any proposal that includes development of these dwindling yet important locations along I-5. Our research is clear: Beaver Creek is part of the northern linkage must be protected from development. This proposal should be evaluated as a smaller part of a much larger mosaic of landscape and habitat, not just its associated parcels and acreage. Regardless, we strongly encourage a formal study related to habitat connectivity before any such rezoning is approved.

We hope the County will begin to think proactively about the environmental challenges we are now facing, and the issues yet to come. Neglecting to consider habitat connectivity, climate change, adaptation, and fragmentation during the decision-making process will have serious consequences in the near future. Washington state cannot afford to try and be reactive to these challenges—if we do, we are already too late.

We thank you for your time and we hope to continue to engage on this issue moving forward.

Brian Stewart MES

Cascades to Olympics Program Coordinator

Conservation Northwest

Web and email

conservationnw.org
facebook.com/ConservationNW
info@conservationnw.org

Seattle headquarters

1829 10th Ave W, Suite B
Seattle, WA 98119
206.675.9747
206.675.1007 (fax)

Maya Teeple

From: Jean Maust <demico@scattercreek.com>
Sent: Thursday, March 18, 2021 11:58 AM
To: Maya Teeple
Subject: Please reject the rezone application for Beaver Creek Dairy Farm

I urge the Commission to deny the Beaver Creek Dairy Farm rezoning application which would reduce farmland in our county.

The county's recent commitment to climate mitigation acknowledges the value of farmland and the preservation of land for the benefit of wildlife and natural landscapes. The Beaver Creek area provides wildlife habitat and also farmland, both of which are critical for the health and vitality of our region, in my opinion.

Over the 30 years I have lived in this county, I have witnessed the increased sprawling of housing and industries. Land, air, water, noise, and light pollution have all increased.

It is my hope that we can focus on economic development which minimizes the expansion of roads and industry to the detriment of living systems that are essential to our well being.

Thank you.

Jean Maust

Tenino WA

Maya Teeple

From: Peter M. Bunce <pbunce98@yahoo.com>
Sent: Thursday, March 18, 2021 12:01 PM
To: Maya Teeple
Subject: Beaver Creek Land Use Amendment

Good afternoon,

I am writing to strongly oppose the Beaver Creek proposal to convert rural residential land into commercial land. The rezoning will have an irreversible impact on the wildlife, environment, and rural lifestyle of residents in the area. I urge the County to not add this proposal to the docket.

Peter Bunce

Maya Teeple

From: MELVIN STANLEY <mds2737@comcast.net>
Sent: Thursday, March 18, 2021 12:35 PM
To: Maya Teeple
Subject: Beaver Creek Farm Rezone

Ms. Teeple,

I agree completely with Sue Denver's letter to the editor in the March 17, 2021 edition of the Olympian. I urge the Thurston County Commissioners to say NO to the request to rezone the Beaver Creek Farm area from rural residential to rural resources industrial. As a lifelong environmentalist, I dislike seeing farmland and wildlife habitat destroyed to make way for acres of warehouses.

Melvin Stanley
2737 85th Ave SW
Olympia, WA 98512
360-754-8405

Maya Teeple

From: Helen Wheatley <hwheatley22@comcast.net>
Sent: Thursday, March 18, 2021 12:52 PM
To: Maya Teeple
Subject: Beaver Creek
Attachments: Comment on Case Road Wheatley.docx; Untitled attachment 00009.html

To Thurston County Community Planning,

Enclosed is a detailed letter in opposition to moving forward on the request to rezone Beaver Creek Farms.

In summary:

The Master Application is incomplete and inaccurate.

The goals of the Growth Management Act must be considered.

RCW 36.70A.020 does not apply as claimed.

RRI zoning for most or all of the parcels would not meet the stated project goal of the applicant (fail location and other RRI criteria).

My statement also addresses the rezoning application process. I argue that the practice of accepting inadequate applications places an inequitable burden upon the public. Applicants should be required to answer questions completely and accurately.

Helen Wheatley
hwheatley22@comcast.net

Helen Wheatley
2218 McCormick Ct SE
Olympia, WA

March 18, 2021

Maya Teeple
Thurston County Community Planning & Economic Development
2000 Lakeridge Dr SW Bldg 1
Olympia WA 98502

To County Commissioners and the Community Planning Division:

I am writing in opposition to placing the Master Application that was submitted November 12, 2020, on the 2021 docket for rezoning of rural resource residential land to rural resource industrial (RRI) at 13333 Case Rd SW, Olympia 98512, known as Beaver Creek Farms.

From the broad perspective of the general public, asking the county to change its zoning is not the normal course of doing business. It is not an opportunity that most residents expect to be made available to them. It is an extraordinary request that goes against all of the work that was done by the public, its elected representatives, and state and local governments to create the current zoning for the comprehensive plan.

An applicant may ask for a rezone for any reason. They may want to build a project. They may request it simply in order to make real estate speculation more profitable for them. Once made, the request puts a demand on county resources, with an aim to undo the County's work and come up with a different zoning designation that better suits the purpose of the applicant. The request places a burden on fellow residents to consider its implications, and to weigh in with County officials if something seems amiss. Concerned citizens must often incur costs to evaluate and, if necessary, to challenge proposed zoning changes. That has been the case with the request now before you. Even right at the beginning of this process, this request has cost me both time and money that I recognize others cannot afford. I spend the time and the money, not because I have any personal interest in the property, but because I care about the health and the future of Thurston County and its residents.

These points are worth making, because it is important to recognize that principles of fair and equal access apply as much to the management of zoning rules as to any other aspect of County governance. As we are living in a time of questioning the structures of privilege, it is fair to ask if the County holds applicants to a high enough standard to assure that the needs of everyone receive equal consideration.

Anyone has a right to ask for a rezone. But all residents of Thurston County have an interest in assuring that the County answer the request by taking action only if it seems like a rezone might be truly worthwhile. A rezone must further the interests of the county significantly

enough to warrant the effort, starting with the acceptance, and stamping of, the Master Application itself. This should be a mindful process, not an automatic one.

The Master Application for 13333 Case Rd SW should be rejected as incomplete until all questions are answered factually, accurately, and completely.

The first step for the County to ascertain that a rezoning request is reasonable, is to require the applicant to fill out a detailed Master Application form. This is the first hurdle to be overcome, but it also triggers the first drain on public resources made by the requestor.

County staff should read the application in order to determine that it has been filled out correctly and may be received for consideration. If a question is left blank, as was done here, that is obvious grounds for rejection. Once it is received, the practical reality is that concerned members of the public are obliged to review the application and write a response in order to assure a fair hearing of their concerns as the process moves forward. Staff are apparently obliged to put the matter before the County Commissioners. In short, the train leaves the station. The farther forward the process moves, the greater the public's investment in it.

That is why I not only oppose placement of the request on the 2021 docket, but I oppose any consideration of the Master Application as it is currently written.

As a member of the public concerned about this potential rezone, I find it inequitable to be expected to weigh in on an application that is **incomplete and inaccurate**. Even at this early point, it is possible that as much time and money has already gone into staff and public response to this document, as the applicant put into writing and submitting it. The burden should go the other way. The applicant should be expected to take great care in answering questions as accurately and as helpfully as possible.

Rezoning for a warehouse would set a precedent that would change rural land use near I-5

The applicant, HW Seattle, asks Commissioners to consider whether a large-scale warehouse/distribution center should be the preferred use of a parcel of rural land, simply because it is located near a freeway ramp and a rail line. Asserting that a warehouse would be allowed on the property under RRI zoning, they make the leap to claim that this is a superior use of the rural land to what is allowed under its current zoning. They ask the County to agree to this claim.

The freeway happens to pass through rural lands for which the state and the county has already set goals based on the Growth Management Act. Adding a warehouse/distribution center to this location would introduce a concept that the presence of the freeway trumps the local context of rural character. It also makes assumptions about the RRI that have not been tested and may not be correct.

The applicant suggests that the county is missing out on a significant economic opportunity. If the County has grounds to believe that a warehouse located in a rural area by a freeway ramp provides greater benefits than a warehouse in an appropriately zoned UGA, then Commissioners should take the step of proposing a revision to the comprehensive plan. There is already zoning for Highway Commercial Districts from which industry is clearly excluded, perhaps with good reason. There should be opportunity for appropriate public and environmental review of the proposal to include industry as a land use to be based on the freeway. Giant warehouses cannot and should not sneak into rural Thurston County through a back door in the rezoning process.

Other nearby counties such as Clark and Pierce Counties have said “No” to rural warehouse/distribution centers built to support the freeway-based retail and logistics industries rather than rural residents and resource industries.

The rezoning request fails to address the Growth Management Act as required.

At the very least, Commissioners should expect to see a full gathering of the facts before they are asked to weigh in on whether a rezoning request should be entertained.

Short of marking up almost the entire Master Application document with criticisms, I wish to highlight the most striking failures to answer what is arguably the single most important question on the Master Application: How does the rezone fit with the Growth Management Act?

In the “All Amendments” section, the master application form asks:

“3. Explain how the proposed amendment fulfills the goals of the Washington State Growth Management Act (RCW 36.70A.020). A list of the goals is attached.”

The GMA is the architectural framework of county zoning. It sets the parameters for determining the answers to all the other questions on the application. It determines what is “appropriate,” what is “needed,” what “issue or problem is resolved” by the rezoning, how the change would “serve the interests of...the public as a whole,” and what the expected character of the land use should be. The rezoning of a specific property (“site specific amendments”) must be viewed through the county’s GMA lens (“all amendments”).

If the applicant cannot make a case for the zoning change under the goals of the GMA, then all bets are off for the other parts of the application. After all, the current zoning has already been found to meet those goals through a very lengthy and painstaking process.

The most important GMA goals for Beaver Creek Dairy/Beaver Creek Farms are those for Natural Resource Industries (Planning Goal 8); Environment (Planning Goal 10) and Urban Growth (Planning Goal 1).

Farming/Natural Resource Industries

The current land use of the property is agricultural. According to the parcel record provided by the Thurston County Assessor, Beaver Creek Dairy LLC is still active on the property and still pays taxes for using it as a farm. Conversion of the property to RRI zoning would be a loss of agricultural land as well as rural residential land. This outcome goes against the goals of the GMA and the county to prevent conversion of agricultural land, especially since the proposed rezoned use has nothing to do with providing rural services.

The GMA goal for Natural Resource Industries is to: “Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, *and discourage incompatible uses*” (emphasis added).

Given the facts about the property as farmland, it is simply unacceptable that the applicant responds to the GMA question regarding natural resources with this statement:

“(Coming)” (sic).

This is a non-answer. It is equivalent to leaving the question blank.

Please do not even consider moving forward until this essential question is answered. The first hurdle in a rezone, after all, is for the applicant to complete the application. Otherwise, why even bother to require an application form? It would be very unreasonable to apply scarce county resources to consider a request that doesn’t meet the most basic requirement: answer the questions.

A request to rezone farmland must answer the farm question.

Environment

GMA Planning Goal 10 is to “Protect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.”

The applicant states that

“the environment will be enhanced/improved with the elimination of the existing dairy farm operation and protection of Beaver Creek in perpetuity. Nitrate loading in the aquifer will be improved with development into a Rural Resource Industrial designation. Wetlands and other habitat areas can be protected with any future development.”

The County has interacted with the Dairy for a number of years over reducing nutrient load, which is a complex but manageable issue. The argument appears to be that taking the farm out

of dairy would help. This may be the case, but it is not an argument for taking the land out of farming altogether, and it is not an argument for why industrial use would be better.

Also, the land use on the property appears to be more complicated than is suggested. Beaver Creek Dairy LLC continues to pay taxes on the property, suggesting that the land is still in some form of active agricultural use. But there was a property transfer by quit claim to Beaver Creek Farms LLC in 2016. Beaver Creek Farms, the entity listed as the owner on the application, is a real estate enterprise. Since the listed owner, Beaver Creek Farms, is a real estate concern, the application should at least also address how rezoning to RRI would compare environmentally to residential use under current zoning.

Given the very large scale and traffic intensity of the proposed use under RRI zoning (see the next section on urban growth), it is reasonable for the County to be concerned that air and water quality would be harmed by rezoning, rather than protected or enhanced as expected under the GMA. It is possible, if hard to conceive, that the applicant could argue that the rezone would be more appropriate for environmental protection than current land use and zoning. By focusing on one environmental aspect, with a single element of questionable relevance, they failed to make that argument.

Since the information provided is incorrect (farm use can be manage for nutrient loads) and/or very incomplete (there are a host of other environmental issues), it is equivalent to a non-answer in regard to a fulfillment of GMA environmental goals.

Furthermore, it should be noted that the county and federal governments just spent \$900,000 for culvert remediation just downstream from the property at Case Road, increasing the significance of Beaver Creek in this location as a salmon stream. Salmon would count as a potentially affected natural resource under the GMA. The Oregon Spotted Frog may also be an element. A robust discussion of the relationship between the rezoned land and stream/wetland buffers would certainly be helpful. Whatever the hopes for a good relationship between future land uses and the stream, the County cannot make any assumptions about land zoned for RRI other than that it will be used for RRI. It is true that wetlands can be protected with future development under RRI, but they can be protected under current zoning too.

Also, the property exists in the midst of what is clearly a meander zone for Beaver Creek. It includes listing as a flood zone and high-water hazard area. From a planning perspective, it is sensible to minimize the built environment and utilize such land for farming. Current policy headaches regarding flooding in the Chehalis Basin might be seen as a cautionary red flag waving in the direction of a proposal to build a huge warehouse on property with water issues.

Thurston County has a history of converting wetlands and flood-prone areas like stream meanders into dairies because pasturage was a good way to turn a profit on such properties in the 20th century. While many dairies in the county were then converted into residential or other real estate, there is also a history of converting former dairy lands to conservation-

oriented land uses (the most spectacular case being the Brown Farm, now the Nisqually National Wildlife Refuge).

Given all these particular elements of the property, there is good reason to assume that GMA planning goals for the environment are better met under the current zoning, now and into the future, than by rezoning and allowing land use that belongs in an urban industrial area. This provides additional impetus for demanding that the applicant provide a complete and fact-based answer at the very start of the process. It must be sufficient to justify applying staff and Councilmember time to the request.

Urban Growth

The applicant makes clear their intention to build a warehouse/distribution center type of facility in the answer to GMA Goal Number 1, Urban Growth. They state:

“Land designated for industrial use can be located within urban growth areas but is also included as a permitted designation in rural area. (sic) The adjacent property is currently designated Rural Resource Industrial. Additionally, Chapter 36.70A.365 provides for a process for redesignating and approving proposals for **major industrial development** outside urban growth areas provided said development requires a parcel of land so large that no suitable parcels are available within the urban growth area.” (emphasis added)

The Urban Growth goal of the GMA is to: “Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.”

There are several ways that the statement provided by the applicant fails to answer the question about meeting the Urban Growth goal.

Claim: No suitable parcels are available within the UGA. The applicant makes and/or implies this assertion throughout the application, but they offer no data to back it up. The attached letter from Arvin Vander Veen of Colliers International provides no data relevant to the question of urban vs. rural property availability. If anything, the data offered regarding Lacey would seem to suggest a more correct interpretation that parcels are available within UGAs.

Lack of parcels in UGAs is a very important criterion under Chapter 36.70A.365, which the applicant cites. That RCW says that a major industrial development in a rural county should only be allowed after “the county has *determined and entered findings* that land suitable to site the major industrial development is unavailable within the urban growth area. Priority shall be given to applications for sites that are adjacent to or in close proximity to the urban growth area.” (Emphasis added.) The County must decide that it has nowhere in a UGA to put a warehouse.

The (draft) 2021 Buildable Lands Report supports the fact that commercial and industrial property is available in Thurston UGAs to accommodate growth.

For the application, the burden is on the applicant to:

state the proposed size of the development; and demonstrate that

(a) there is no property available within a UGA that is big enough to fit the proposed size; and that

(b) Beaver Creek Farms/Beaver Creek Dairy is the available land closest to a UGA.

Proximity to other land zoned RRI is irrelevant. In fact, it might be interpreted to suggest that land is already available for a warehouse project, making the Beaver Creek Farms rezoning even more unnecessary.

Claim: Industrial Use is Permitted in Rural Areas. The applicant is correct that land for industrial use can be located in rural areas. But RRI zoning is not the equivalent of urban industrial zoning. Based on the proposed use, the Urban Growth question demands justification for rezoning from a rural use to an *urban* industrial use. With its Agritourism Overlay District zoning, the County has already determined that agriculture ranks as a preferred use (see 20.08G.015, Conflicts with other regulations).

To understand RRI zoning, which can indeed include warehouses or light industry, it is important to understand what the state intends for rural industry.

The whole point of the GMA is to draw a bright line between urban and rural, in order to push industrial use into urban zones unless it is needed to facilitate rural land use. Taken in context with other zoning and laws, the concept of service to rural resource use or to rural residents applies in Thurston County to warehouses and light industries in RRI zones, even if proximity to a freeway interchange broadens the list of allowed land uses.

The applicant cannot argue on the one hand that the rezone is for a major industrial development that is so huge it does not fit in an existing UGA, and assert at the same time that the land use is consistent with rural zoning of any sort, including RRI.

It may be helpful to review RCW 36.70A.011 (Counties), “Findings – Rural lands.” This chapter calls upon counties to:

“...Foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land-use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life.”

The state does not intend to squelch jobs or business opportunities in rural-zoned areas. But it does seek to orient the rural economy toward supporting rural lands and rural character as a valued part of the Washington's economy. "Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state's overall quality of life." According to the legislature, there should be flexibility for *existing* businesses in rural areas, a recognition that not all business developments require an urban level of services, and an understanding that businesses can exist within the definition of rural character.

Thurston County is expected to support rural businesses, not undermine them.

The Master Application should address how the rezoning is consistent with the rural elements of county planning, the GMA and all of Title 36, including Findings—Rural Lands.

Claim: Rezoning fits an existing process for proposals to place major industrial developments in rural Thurston County. As demonstrated above, the statement made by the applicant on Urban Growth misinterprets the Title 36 chapter, RCW 36.70A.365 in regard to placement of major industrial developments. It also misinterprets the process for proposing such a placement.

The RCW does *not* "provide for a process for redesignating and approving proposals for major industrial development outside urban growth areas" except in the extremely broad sense of allowing Counties to create one, provided the counties do so "in consultation with cities consistent with provisions of RCW 36.71A.210." (Countywide planning policies). It lists a number of review criteria that counties should use, but are not limited to, should they establish a process for approving major industrial developments outside of UGAs.

If Thurston County has established review criteria under 36.70A.365 that would apply to placement of a major industrial area in a rural zone, then the application should answer on the basis of Thurston County's requirements. It is more likely, however, that there is not a County "process for redesignating and approving" such proposals, as suggested by the applicant. There is merely the request to rezone made in the Master Application, and the process that would be enacted if it were placed on the docket. The RCW tells us that isn't good enough for the scale of the proposal.

To make the case to that the County should allow a major industrial development to break out of the urban core and move into the rural landscape, the Master Application should, based on the specific requirements of RCW 36.70A.365, at the very least discuss such matters as how new infrastructure would be provided/paid for; how traffic would be managed; how the County would gain assurance that urban growth will not occur in adjacent nonurban areas; and how adverse impacts on rural resource lands would be mitigated.

Public Facilities and Services. The applicant fails to address the GMA's fundamental Urban Growth goal of achieving efficiency, because they do not explain the potential impact of a

major industrial development on rural public facilities and services. Allowing developments that push toward an urban level of demand goes against the intention of rural zoning. It strains credulity to imply or assert that the impacts of a “major industrial development” too big for any of the County’s UGAs, would be insignificant.

The impacts of a “major industrial development”/large scale warehouse matter not only in terms of the GMA, but also in terms of the proposed RRI zoning (Chapter 20.29). One of the RRI locational criteria is that “Proposed use will not require urban services or facilities.” Again, unless the applicant makes a concrete case to the contrary, the assumption should surely be that an upgrade in transportation and possibly other facilities and services would be necessary.

A further question is whether the property would even fit within the locational criteria under RRI. The bulk of the Beaver Creek Farms property parcels appear to fall outside of the half mile, so the logic for rezoning those parcels is lost. The applicant should at least provide a map illustrating how all of the property parcels would meet the locational criteria.

There are other GMA goals that are not answered well in the application. Urban sprawl, transportation, and economic development deserve particular notice.

With the answers given, especially in light of the GMA goals, the application fails to make a case that existing zoning is not appropriate, or that the requested rezone would be more appropriate than current zoning.

Rather than quibble over each point, however, I will trust that the case has been made. This application is just not good enough to move on to the next step.

A commitment to comprehensive planning under the GMA requires a commitment to uphold the rural side of the urban/rural dichotomy. If an applicant proposes to undermine the careful balance of interests established by zoning, the burden is on them to provide well documented and compelling reasons.

So far, the applicant HW Seattle has failed to step up to the starting line with an application appropriate to the scale of the proposal. They have not presented the County and the public with an application that respects the hard work of comprehensive planning; that shows awareness of the demands it is placing upon the county by making its request; that addresses legitimate public concerns by answering them based on the guidance provided by the application form; and that reflects the county’s urgent need to listen to science when it considers land use questions in this time of climate emergency.

I suspect that HW Seattle and its Point of Contact, Mr Pantier, would be unable to answer the questions adequately if the County were to require them to do so instead of accepting the submission of an incomplete and at times inaccurate application. The process should work as intended. Answering the questions helps to save everyone the cost and the trouble of considering a proposal that should not move forward.

There is UGA land available for large industrial development without converting this agricultural property. The parcels put forward for the proposed development do not fit the criteria for RRI. The existing land use designation is appropriate. Conditions have not changed to make the proposed rezone more appropriate. And a significant number of people in Thurston County, including many of the young people who would simply be moving from one dead end of the retail universe to another, would argue that warehouses are not good for the local economy or local jobs. They would prefer to see the County pour its resources into building sustainable, green, family wage jobs.

Sincerely,

Helen Wheatley
Olympia, Washington

Maya Teeple

From: Bonnie Wood <bwood2800@gmail.com>
Sent: Thursday, March 18, 2021 1:20 PM
To: Maya Teeple
Subject: Please do not rezone Beaver Creek Dairy Farm

March 18, 2021

Dear Thurston County Commissioners:

I urge you not to rezone the Beaver Creek Dairy Farm to industrial uses.

The South Sound Prairie ecosystem is precious and priceless. One of the reasons I live in and love Thurston County is our closeness to South Sound prairies and agricultural lands. I have spent many happy hours walking and birding at Glacial Heritage, Mima Mounds, and Scatter Creek and canoeing on the Black River. All of these would be irreparably harmed by a large warehouse campus, with its parking pavement, huge-footprint buildings, and all associated traffic. Wildlife in the area, including migrating salmon, would be forced away.

Please don't decide so easily to destroy this land, of which we have less and less, for industry!

Thank you for your attention.

Bonnie Wood

2800 Aberdeen Court S.E.

Olympia, Washington 98501

Maya Teeple

From: County_Commissioners
Sent: Thursday, March 18, 2021 1:47 PM
To: Maya Teeple
Subject: FW: Beaver Creek protection

Public coment.

Katey Johnson

Executive Assistant to County Manager Ramiro Chavez
 Thurston County Commissioners' Office
 Office: (360) 786-5440
 Cell: (360) 463-1169

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 18, 2021 1:30 PM
To: County_Commissioners <County.Commissioners@co.thurston.wa.us>
Subject: Beaver Creek protection

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: the Thurston County Commissioners

Subject:

From: Elizabeth M. Clarke

Email (if provided): gammyemc@gmail.com

Phone: (if provided): **360-972-2357**

Message:

**I am writing to ask you not to approve the " wish fulfillment " center near the Maytown exit.
 Beaver Creek runs through the area .Salmon spawn here. Beaver and otters live nearby. Bears wander
 from Scott Lake to Black River.
 The towns here are small, rural and we live here intentionally.
 Groups of bicycles tour regularly.
 What would warehouses and trucks do to our property values, let alone our quality of life?
 Please do not allow this travesty to occur!
 Keep rural Thurston County rural!
 Thank you,
 Elizabeth Clarke**

Maya Teeple

From: Sherry Buckner <bucknersherry@hotmail.com>
Sent: Thursday, March 18, 2021 2:26 PM
To: Maya Teeple
Subject: Beaver Creek Rezone Request - Comment

Hello,

I am saddened to hear that the owners of this farmland property are interested in rezoning it to Industrial.

This location and the high quality of this land, where it is located (connected to other wildlife corridors, preserves and an active coho salmon stream) makes it unusually valuable for long term protection from heavy development.

I ask that this property rezone be denied, it is a strange, unnecessary and thoughtless request. There is plenty of land that is currently unused that is zoned Industrial. This is out of place, and looks like it serves no one but the person who sales it.

Sherry Buckner

Sherry Buckner
Red Twig Studio
www.sherrybuckner.com
360-786-5707

Maya Teeple

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 18, 2021 2:30 PM
To: Maya Teeple
Subject: Beaver Creek Rezone

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Maya Teeple**

Subject:

From: **Joan Quigley**

Email (if provided): **jmquigley@hotmail.com**

Phone: (if provided): **360-5297035**

Message:

I am against the zoning change proposal for the 390 acre Beaver Creek farm. There is a lot of development in this part of the county already. Stopping this parcel of farm land from being excavated and covered in asphalt seems like a positive step in keeping the area rural.

Maya Teeple

From: Joshua Martin <josh.s.martin@gmail.com>
Sent: Thursday, March 18, 2021 2:37 PM
To: Maya Teeple
Subject: Comments regarding Land Use Re-zoning near Beaver Creek

Ms. Teeple,

I would like to submit my comments regarding the proposed re-zoning of the Beaver Creek area of Thurston County. This area is near Exit 95 on I-5 and the property in question is behind the Freightliner facility on Case Rd SW. I would like to strongly object to the industrialization of this area. My wife and I purchased our house on Case Road SW for several reasons, the first of which was the rural community and the lack of traffic congestion in our neighborhood. This area has character, and a rural agriculture setting that is quickly disappearing in Thurston County. A 390 acre warehouse facility in this location would be devastating to the community and the environment. It is estimated that the facility would bring 7000 additional vehicle trips a day to our exit. These roads are not built for this type of traffic and already struggle with the trucks coming and going from the Freightliner facility. Trucks already struggle making the turn onto Case Rd without driving in oncoming lanes or getting high-centered on the rough, uneven pavement on that corner. There is simply not enough room in that intersection for trucks to drive safely, even at our current traffic levels. Adding to that traffic load would make our commutes less enjoyable, longer and more dangerous.

Additionally, adding that 390 acres of impervious surface would jeopardize the fish-bearing creek adjacent to the property. Thurston County just recently completed a Fish Barrier Removal project with the bridge built just south of the subject property on Case Rd. Adding 390 acres of buildings and concrete/asphalt driving surfaces would only channel more pollution and toxins into the creek, further jeopardizing any fish and other wildlife that depend on the creek. As it stands, with the land being used for agricultural purposes, rainwater can swiftly and easily penetrate the top soil and revitalize the existing aquifers that the surrounding communities depend on for clean drinking water. Replacing the soil with impervious surfaces and adding the inevitable gas, diesel and oil spills that come with that amount of truck traffic will jeopardize our surface and sub-surface water supplies and will endanger the vital resources of all the residences in the area.

Industrial expansion is already planned for the properties adjacent to Exit 99. As I understand it, a second truck stop is planned there, along with several warehouse facilities. South Thurston County does not need to expand its industrialization any further south, as those resources and needs are already being planned for the next exit north. As it stands, we already have a truck service center and a shipping depot at Exit 95 (Freightliner and Old Dominion). Adding to this truck load would ruin the roads, the commute and the quiet community many of us moved here for.

Please strongly consider denying the re-zoning application for the Beaver Creek area. Help us keep our community rural, and not industrial.

Thank you,

Joshua Martin, P.E.

Maya Teeple

From: Dede Smith <d35smith53@yahoo.com>
Sent: Thursday, March 18, 2021 2:37 PM
To: Maya Teeple
Subject: Urging rejection of a rezone application for Beaver Creek Dairy Farm

Dear Thurston County Commissioners:

I request that the Commissioners remove this rezoning request from further consideration.

My combined 15+ acres share northern and western boundary lines with the dairy farm. I am downwind and uphill from the dairy's manure lagoon and barns.

When I bought my land in 2003 I understood and accepted the zoning, both agricultural and one home in five acres, including the smells from the dairy. I also understood Thurston County's obligations under the Growth Management Act.

More specifically, I realized the county had the duty to

- * protect the salmon in Beaver Creek and the wildlife using the corridor under I-5;
- * preserve the dairy land as farmland though perhaps of a different kind of farming as time went on; and
- * maintain the rural character of my immediate surroundings.

No buffer exists that will prevent a warehouse facility from being front and center to my views of the Black Hills given that the elevation of my home exceeds that of the dairy fields.

My water is supplied by my own well. I strongly object to any rezone that could degrade my water supply.

More truck traffic will be unsafe on these rural roads. A freeway interchange serving farms and residences is of equal value to one serving a distribution center. The values of the Growth Management Act are not listed in priority order but rather each is to be considered on its own merits. (We are not talking about economic value to the landholder but rather the larger values of the Growth Management Act.)

Our small community on “the hill” behind Freightliner is zoned one home in five acres. We are not seeking a rezone to increase the value of our properties to a developer. We are attentive stewards of our land within, and thankful for, the zoning and environmental protections the county has designated and as required by environmental laws.

My 15+ acres are a forest. I plan for them to remain just that. This does not benefit me financially. Rather, the benefit is to current and future generations (of strangers since I have no children), seasonal water features, trees of many species, and wildlife from the fungi in the soil to the birds both resident and migratory. These are benefits and beauties I, too, enjoy and appreciate greatly.

My small woodlot is but one in a huge tapestry of small woodlands, residences, and farms that allows wildlife and city and country people to share a beautiful, thriving environment in Thurston County and Western Washington. Please consider this bigger picture as you make your decisions. The dairy land is also part of

this tapestry and has been for many decades, designated as such in the 1990s after our state enacted the Growth Management Act.

This is a formal protest to the proposed rezone.

Thank you for your consideration.

Diane Smith

Sent from my iPad



State of Washington
Department of Fish and Wildlife

Mailing Address: PO Box 43200, Olympia, WA 98504-3200, (360) 902-2200, TDD (360) 902-2207
 Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

March 18, 2021

Maya Teeple
 Thurston County Community Planning & Economic Development
 Community Planning Division
 2000 Lakeridge Dr SW, Bldg 1, Olympia, Washington 98502
maya.teeple@co.thurston.wa.us

Subject: Comp Plan Amendment for Beaver Creek Industrial Park - Project #2020105505

Dear Ms. Teeple,

Thank you for the opportunity to review materials for the proposed Beaver Creek Industrial Park. The Washington Department of Fish and Wildlife (WDFW) has reviewed the project and offers the following comments at this time. Other comments may be offered in the future.

The Beaver Creek watershed supports several species of particular interest to WDFW. The Oregon Spotted Frog (*Rana pretiosa*, state status: Endangered, federal status: Threatened) and Olympic mudminnow (*Novumbra hubbsi*, state status: Sensitive) are both documented to occur near the subject property. Additionally, a large portion of the subject property (Figure 1) is Designated Federal Critical Habitat for Oregon Spotted Frog. From a desk-review, the subject property appears to contain off-channel habitat of Beaver Creek and emergent wetlands which may support both Oregon Spotted Frog and Olympic mudminnow.

Agricultural management of this property may also support Oregon Spotted Frog habitat through practices such as grazing (Oregon Spotted Frog prefer short emergent vegetation for breeding). Development of the site risks impacting Oregon Spotted Frog habitat directly, and also indirectly through loss of agricultural practices such as grazing.

Due to the proximity of these species and their habitats to the proposed industrial park, and to align with the Growth Management Act goals set forth in RCW 36.70A.020, WDFW recommends that the subject property retain its current zoning designation. If the proposal to rezone and develop the site into an industrial park moves forward, WDFW recommends a habitat assessment and management plan be completed to evaluate and address any potential impacts to Oregon Spotted Frog, Olympic mudminnow, and other species using the site.

Thank you for the opportunity to review these materials and please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "N. J. Jay", is written below the word "Sincerely,".



State of Washington
Department of Fish and Wildlife

Mailing Address: PO Box 43200, Olympia, WA 98504-3200, (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

Noll Steinweg
WDFW Habitat Biologist
Noll.Steinweg@dfw.wa.gov
(360) 628-2173

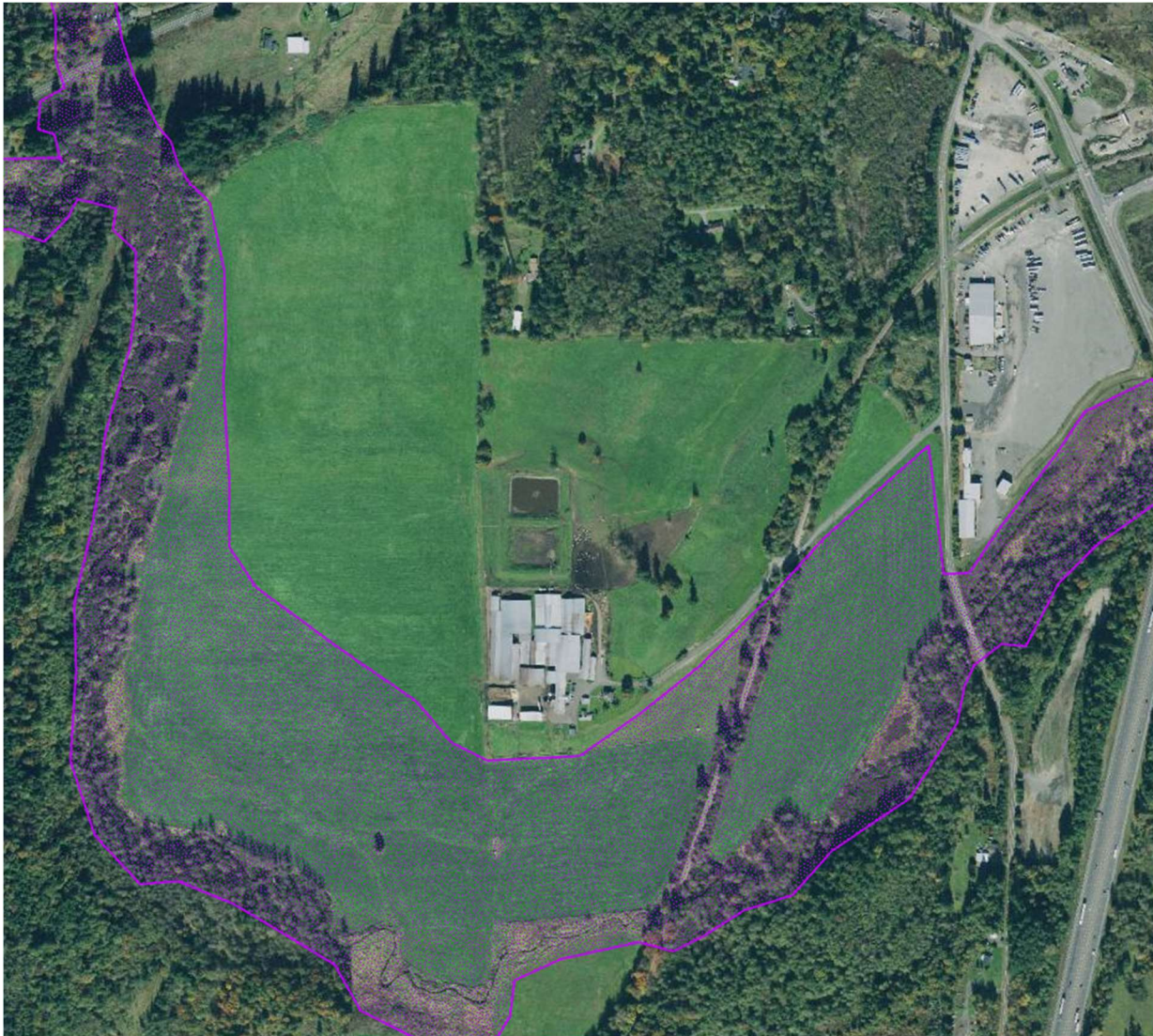


Figure 1: Purple polygon indicates Designated Federal Critical Habitat for Oregon Spotted Frog

Maya Teeple

From: maytownturners@aol.com
Sent: Thursday, March 18, 2021 3:20 PM
To: Maya Teeple
Subject: WAREHOUSE AT EXIT 95

Hello. I am writing to let you know that my family and I do not support the proposed building of a huge ware house at exit 95. This is rural farmland and family housing area and we would like to keep it that way. On top of that I have a hard time believing that a warehouse there would be good for the salmon run in Beaver Creek. Also, There is a proposed warehouse at exit 99 . Please do not overtake our rural farming and recreational area at exit 95.

Sincerely,
Rebecca Turner

Maya Teeple

From: John McClung <steelguitarlessons@earthlink.net>
Sent: Thursday, March 18, 2021 3:44 PM
To: Maya Teeple
Subject: Beaver Creek Land Use Amendment feedback

Maya, please pass on my comments to the Commissioners, thanks!

County Commissioners:

I'm writing to express my fervent desire to stop the proposed Beaver Creek Land Use Amendment from being docketed, or approved, much less built. This change which would allow an intrusive commercial project at exit 95 on the I-5 freeway.

The increase in the amount of truck and other vehicle traffic in and out of such a facility would go a long way towards disrupting and destroying the quiet rural area I choose to live in.

Additionally, it could pose a threat to the salmon in Beaver Creek.

Further, the recent commercial development that is and has been going on at exit 99 (93rd Ave. SW) has made getting on and off at the exit increasingly difficult. Doing the same thing to the very next exit/entrance at exit 95 will undoubtedly make life difficult for South Thurston County residents here. That would no doubt force more traffic onto 2-lane Littlerock Road, making that route more difficult as well.

Thank you for listening to concerned residents like myself and many others. We are deeply concerned about maintaining, the quiet, rural nature of life here in South Thurston County.

Sincerely,

John McClung

Littlerock resident since 2014

All best,

John McClung

Pedal Steel Lessons, Casuals, Sessions



Olympia, WA 98512

Email & PayPal fees – steelguitarlessons@earthlink.net

Easy PayPal link: https://paypal.me/JohnMcClung?locale.x=en_US

Website – <http://steelguitarlessons.com>

Skype name: professortwang

Cell & text: 310-480-0717

Maya Teeple

From: Donna R <123bdr@comcast.net>
Sent: Thursday, March 18, 2021 4:06 PM
To: Maya Teeple
Subject: Protecting rural Thurston County

Rezoning the Beaver Creek Farm just west of I-5 could set a precedent for I-5 to become a “warehouse alley”. This rezoning would be a disaster to local rural and conservation lands. Beaver Creek would also become compromised by pollution. That area is now a source of clean drinking water that must be protected. This is a “no-brainer”, NO INDUSTRY~!

We want to emulate Skagit Valley and productive lands.

Thank you

Mrs. D. Roylance

Olympia, Wa.

Maya Teeple

From: Linda Nielsen <lindaan48@yahoo.com>
Sent: Thursday, March 18, 2021 4:22 PM
To: Maya Teeple
Subject: Citizen Comment

Add my voice to those who are speaking re: the rezoning of the Beaver Creek Dairy Farm . I have seen over the last 4 years the way the trees have been and the nature of the lands completely altered to accommodate large HUGE warehouses up in the Hawks Prairie Area. I have stopped by car and tried to give aid to a large male coyotal laying at the side of the road hit by a car. He died, the deer have died , the birds have no where to hid. Enough cheap land has been given over the corporates.

Please to not let this section of land be rezoned and sold to build another large warehouse/distribution center...it is also currently a wildlife corridor and I can see the encroachment of paving and trucks turning their eyes to the southern portion of our county.

I am OPPOSED to this. It is easy to say yes to more revenue, sell the land and move on....please let us value our existing rural lands and do what can be done to protect them.

Linda Nielsen
Olympia WA

Maya Teeple

From: Charles and Beverly Hbnr <bevandcharlie@hotmail.com>
Sent: Thursday, March 18, 2021 5:45 PM
To: Maya Teeple
Subject: Delay of proposed Beaver creek Dairy farm Rezone.

Dear Ms. Teeple:

We are long term members of the Black Hills Audubon Society, since about 1969 - 1970 when we moved to Thurston County. We fully agree with the Black Hills Audubon Society position on the Beaver Creek Dairy and wish that you also consider us as opposed to the rezone.

Charles F Heebner & Beverly C. Heebner

Maya Teeple

From: Peggy Clifford <peggoly@gmail.com>
Sent: Thursday, March 18, 2021 6:38 PM
To: Maya Teeple
Subject: Comments on Beaver Creek development

Please consider comments on this proposed development. We are in danger of losing our salmon, and this property includes important salmon habitat. Impacts to our remaining salmon bearing streams should not be allowed.

Thank you,

Margaret Clifford

From: [Ryan Bedford](#)
To: [Maya Teeple](#)
Subject: Comments on Beaver Creek Rezone
Date: Thursday, March 18, 2021 7:12:10 PM

Ms. Teeple,

I live near the proposed rezone area and disagree with the proposal. My family chose to purchase a home in this area because of the rural nature of the area, little traffic and congestion, and great neighbors.

The Maytown road exit is not conducive to such an increase in truck traffic. The inclines going both directions, north and southbound, are hard enough for vehicles, much less loaded trucks. While the on ramps extend probably long enough over the top of the hill, the trouble will be the increased number of passenger vehicles trying to merge into existing traffic because the merging lanes are occupied with slow-moving trucks.

If anything, I would think the grand mound area would be a better location because of the geography and the infrastructure had already been improved and could better handle the increased volume of traffic.

In short, I do not agree with the rezoning.

Thank you,

Ryan Bedford
Bedford Law Office PS
1800 Cooper Point Rd. SW Building 3
Olympia, WA 98502
360-292-5833
www.bedfordlawoffice.com

From: [Doug & Lillian Ryan](#)
To: [Maya Teeple](#)
Subject: NO on Beaver Creek Rezone
Date: Thursday, March 18, 2021 7:41:10 PM

To the Thurston County Commissioners:

Please protect the rural character of Thurston County by **rejecting** the proposal to rezone Beaver Creek Farm from rural residential to rural resource industrial. This parcel of land is in the fragile Beaver Creek watershed which drains into the Chehalis River via the Black River. These streams are important habitat for some of the few remaining viable runs of wild coho and chinook salmon and steelhead remaining in the Pacific Northwest. It is also an aquifer that supplies clean drinking water for homes and communities in the basin. Allowing large-scale industrial developments in this basin will introduce polluted surface runoff and the hazard of chemical and oil spills that could harm these precious resources.

Please keep Thurston County rural for our children and vote “No” on this rezoning proposal.

Douglas and Lillian Ryan

Olympia

From: [Barb Carey](#)
To: [Maya Teeple](#)
Subject: Refuse the re-zone application for the Beaver Creek Dairy Farm
Date: Thursday, March 18, 2021 8:45:14 PM

Dear Commissioners,

I respectfully ask you to refuse the re-zone for the Beaver Creek Dairy Farm property. As a retired hydrogeologist, I am familiar with the detailed 2002 Department of Ecology groundwater study at the site (Erickson, 2002). The Beaver Creek Dairy site is an aquifer recharge area, in other words rainwater percolating through the soil and into the ground replenishes the aquifer. Impervious construction, such as buildings and pavement, restrict the flow of water into the aquifer and consequently into Beaver Creek.

According to Erickson (2002), "the stream discharge in summer depends substantially on groundwater inputs" from the stretch of creek on the site. Erickson estimated 82,000 cubic feet per day of flow from groundwater to the creek along the creek at the site. Depriving the creek of a major portion of flow in the summer due to impervious ground cover could cause substantial deterioration of habitat for salmon and wildlife in and around Beaver Creek.

The importance of Beaver Creek for salmon and wildlife, not to mention potential damage to fish and wildlife from even small volumes of spills or flooding, make this rezone contrary to county environmental protection aims.

I appreciate your consideration of these complex and interrelated environmental concerns.

Sincerely,

Barbara Carey, LHg
2706 Hampton Ct SE
Olympia, WA 98501

Reference

Erickson D. 2002, Effects of Land Application of Dairy Manure and Wastewater on Groundwater Quality--Pre- and Post-Animal Waste Holding Pond Monitoring. Washington State Department of Ecology Pub No. 02-03-002. 123 p.
<https://apps.ecology.wa.gov/publications/documents/0203002.pdf>

From: [Paul Bakke](#)
To: [Maya Teeple](#); [Tye Menser](#); [Carolina Mejia-Barahona](#); [Gary Edwards](#)
Subject: Reject Rezone Application for Beaver Creek Dairy Farm Property
Date: Thursday, March 18, 2021 9:27:47 PM

To County Commissioners and the Community Planning Division:

I am writing to ask that you reject the rezone application for Beaver Creek Dairy Farm near I-5, exit 95 (13333 Case Rd SW, Olympia 98512). The proposed zoning change, from Rural Resources (RR) to Rural Resource Industrial (RRI) in order to allow building a large warehouse/distribution center, would negate 30 years' worth of coordinated, science-based conservation and protection actions dedicated to recover the Chehalis River Watershed salmon stocks and restore damaged habitat and water quality.

I am a professional river scientist and have worked in river restoration for nearly 30 years. For 19 years, I was the hydrologist and geomorphologist for the U.S. Fish and Wildlife Service in Lacey. For most of those 19 years, a focal area of my work was the Chehalis Fisheries Restoration Program. This federal program, which was designed in part to mitigate for damage to Tribal trust resources, including declining salmon runs in the Chehalis, funded dozens of restoration projects throughout the Black River watershed and its tributaries. One of those tributaries is Beaver Creek, which would be profoundly affected by this proposed rezone. One of the things that became readily apparent to me as a scientist working in salmon habitat restoration is that restoration cannot save the salmon if we continue to degrade existing habitat and water quality. Moreover, there is really no way to mitigate for degradation in a way that offsets habitat destruction. It has been tried again and again, and continues not to work.

To be more specific, construction of a large warehouse/distribution center, along with the roads and increased traffic that this entails, will alter the hydrology (pattern of stream flow), the groundwater-surface water relationships, and the chemical and physical quality of the water in Beaver Creek and in the Black River downstream. Stormwater mitigation technologies are designed to reduce the impact of impervious surfaces on peak (maximum) stream discharge. But they do not, indeed, cannot, reestablish a natural stream discharge pattern. The altered pattern of water discharge creates a different aquatic environment for fish, and results in a different magnitude and frequency of movement of the gravels and sands making up the streambed. This has deleterious effects on salmon spawning, making the bed less stable, and changing its texture (proportions of fine versus coarse sediment). Eggs deposited by spawning fish become more susceptible to scour or burial. But also, almost invariably, it leads to increased stream bank erosion, and increased action by landowners to armor up the eroding banks with hard bank protection. This, in turn, alters the water velocities, forcing the fish to seek refuge during high water, further altering the movement of sands and gravels, and altering the form or shape of the stream channel. All of these unintended consequences make it harder for salmon to carry out their lifecycle.

Impervious surfaces alter the balance between rainfall that quickly enters the stream channel, versus rainfall that percolates slowly and deeply into the ground, becoming groundwater. Engineered structures do not reproduce the same rate and depth of infiltration as a vegetated area, nor do they have the degree of filtration capacity or resistance to saturation from toxins. When infiltration is converted to runoff, there is less groundwater. That means, usually, less water entering the stream during the hottest months of the summer when that water (which is usually cooler than the surface water) is most needed. There is also less groundwater for nourishing wetlands and for human consumption.

Water quality is also affected when open vegetation is converted to impervious surfaces, particularly when those impervious surfaces are pavement with truck and automobile traffic. Water entering the stream channel from these surfaces has a different temperature than water entering after percolating through the ground. Generally, that water is warmer, and causes extreme stress to juvenile salmon during the warm parts of the year. In many cases, salmon become excluded altogether because of excess temperatures. A more insidious effect on water quality is the chemical content of the runoff from the parking lots and roads. Recent investigations at the University of

Washington have identified tire-wear particles as the source of chemicals that are acutely toxic to Coho salmon. Salmon entering the stream after spending their life in the ocean, then die from chemical exposure before they can lay their eggs. This problem is called early-spawner mortality syndrome, and is well documented in recent literature.

There is also a substantial literature on the aforementioned physical effects, associated with the phenomenon we call urbanization, or from the point of view of the fish, "urban stream syndrome." This rezoning is, as I see it, a substantial first step towards accelerated urbanization of South Thurston County. In the literature there is discussion about how much of the watershed needs to be converted from open vegetation to roads, buildings, and parking lots in order for all of these damaging effects to turn a functioning stream into degraded habitat. The threshold is surprisingly low, possibly about 10 percent. Once the process of rezoning and urbanization begins, it doesn't take long before it reaches that threshold, and then the fish are gone, and along with them, a lifetime or more of conservation work, more broken promises to protect tribal trust resources, and many tens of millions of public dollars spent trying to restore the salmon stocks.

Zoning isn't just about preserving rural character and lifestyle, as important as those amenities are to the public. It is also about following the science on how to best protect our public resources, including fish and water quality, on into the future. If zoning is allowed to change on political whim or from pressure from individual landowners, those resources, our children's resources, are seriously in jeopardy.

Please deny this rezoning request.

Respectfully,

Paul Bakke,

Fluvial geomorphologist and Hydrologist

4031 Wexford Loop SE

Olympia, WA 98501

thescienceofrivers@outlook.com

360.412.0220

From: [Sandler & Seppanen](#)
To: [Maya Teeple](#); [Tye Menser](#); Carolina.Mejia@co.Thurston.wa.us; [Gary Edwards](#)
Subject: Comment regarding Request to Rezone from rural residential and farmland to industrial, Beaver Creek Dairy
Date: Thursday, March 18, 2021 9:37:31 PM

Thurston County Commissioners,

The proposal to place a request to rezone the Beaver Creek Dairy Farm from RR 1-5 to RRI on the county Docket raises three concerns for me:

- Changing to zoning on farmed land from RR 1-5 to RRI is contrary to the goal of No Net Loss of Farmland.
- Putting the proposal on the current 2020-21 Docket threatens staff time in support of No Net Loss through the [Community-Driven Review of Agricultural Policies and Practices](#). That work needs to remain a high priority this year and likely next year as the issues are complex and the community interest is broad and at a high level. The dairy farmer at Beaver Creek Dairy Farm says that his dairy farm is no longer a viable business. The Review has amongst its aims to identify ways to address viability issues for farmers.
- The proposal as currently submitted fails to meet the standard for the good community planning of the kind we all want to see in our county. I provide more details below.

Consequently, **I ask that the rezone request be considered for the 2022 Docket**, not the current Docket.

My planning concerns are:

- **The County Does Not Need Additional Rural Resource Industrial Land:** The draft [2021 Buildable Lands Report](#), a document developed for use in city and county planning, finds more capacity for building on the current urban and rural industrial zones than the projected 20-year demand for such building space. In fact, some of that capacity is in the existing RRI zone at the Maytown intersection. That RRI zone is mostly undeveloped land. That undeveloped land includes parcels east of I-5 and north of Maytown Road.
- **This Rezone Could be Seen as “Spot Zoning” Which is Not Good Planning.** The area around Beaver Creek Dairy Farm consists of other farms, forest land, homes on five acre lots, conserved areas, and wetlands. There are homes, farms and forestland along Maytown Road going west of the Beaver Creek Dairy Farm and on Case Road running south and parallel to I-5 down to Scatter Creek. These land uses are the permitted activities for a Rural Residential Resource 1-5 zone. Carving out RRI acreage in an area where land is used for rural homes, farms and forestry is not in accordance with the comprehensive plan. Doing so may fit the definition of “Spot Zoning.”
- **The Request is Not Ready for Decision-Making** (sorry that this gets detailed): The Thurston Comprehensive Plan clearly states that activities in RRI zones meet specific needs of “natural resource-based industries” (Chapter 2, page 11). “Industrial areas and development shall be functionally and visually compatible with the surrounding rural area and uses in order to protect the rural character... The area should be located so that development will not detrimentally impact agriculture, forestry, aquaculture or other natural resource uses.” (Chapter 2, pages 29-30). The landowner’s request does not explain why a warehouse specific to the nearby forest, conservation, and agricultural activities is needed. The landowner states that current Rural Residential Resource 1-5 zoning (RRR 1-5) is inappropriate because it is near the interchange. On the contrary, being near a railroad and the interchange is a benefit for the dairy farm given that the farm brings in feed in large quantities and needs to accommodate the daily or every other day mail truck. When asked what conditions changed that now make RRR 1-5 zoning less appropriate than the proposed RRI (industrial) zoning, the landowner does not talk about condition changes for farms, forestry, and housing. **Conditions have changed for dairy, but the rezoning issue is not about dairy, it is about changing the RR 1-5 zoning.** No information is given to suggest the current zoning is now less viable than when the land was first zoned. When asked how the rezone would impact surrounding land use, the landowner states that homeowners would

see “adequate buffers.” That is not responsive to the question of impact on surrounding farms, forestry, or housing.

Loretta Seppanen
Olympia WA
Laurel.lodge@comcast.net

From: [Martha Rosemeyer](#)
To: [Maya Teeple](#)
Subject: Request to rezone the Beaver Creek Dairy
Date: Thursday, March 18, 2021 10:35:59 PM

Dear Senior Planner Teeple,

I am writing today to request that the BoCC not place the Beaver Creek Dairy rezone request on the 20-21 Docket. Currently Beaver Creek Dairy is 300 acre of land that is zoned agricultural and if rezoned industrial, then the county loses farmland. Please either remove the rezone request all together --or-- remove it now and reconsider the request in 2022. It is 300 acres of farmland that could be lost to a warehouse in an environmentally sensitive area around Beaver Creek.

Currently Thurston County is losing 3,000 acres of farmland per year . We need to strengthen the Community-Driven Review process by prioritizing it on the docket so that Thurston County reaches the goal of No Net Loss of Farmland!

If the COVID crisis has taught us anything, it is the importance of food systems, particularly locally resilient food systems. This isn't the time to let agricultural land to slip away!

Thank you for considering my request.

Sincerely,
Martha Rosemeyer
1143 Mix St NW
Olympia WA 98502

From: [Ed C](#)
To: [Maya Teeple](#)
Subject: Exit 95 proposed project
Date: Thursday, March 18, 2021 10:53:01 PM

Please put our vote in for NO on the Fulfillment Center at exit 95. This would congest our country roads and pollute our peaceful, QUIET lifestyle we have chosen over the noise of the city, big trucks and congestion. This issue was recently addressed for Beaver Creek and Millersylvania State Park. The same issues for NOT putting one at Exit 99 are the same reasons for NOT putting one at Exit 95. If the answer from residents was NO the first time, asking again will NOT change the answer. MOVE ON ELSEWHERE! Find a commercial area for this pet project of whatever group is pushing it.

Thank you,
Ed & Susan Cogan
6724 128th Ave S.W.

Sent from [Mail](#) for Windows 10

From: [Meryl B.](#)
To: [Maya Teeple](#); [County Commissioners](#)
Subject: Beaver Creek Land Use Amendment, March 2021
Date: Friday, March 19, 2021 3:45:49 AM
Attachments: [Beaver Creek Land Use Amendment, March 2021.docx](#)

CONTENT IN EMAIL SAME AS ATTACHMENT.

To: The BoCC, Thurston County

Date: 18 March 2021

Subject: Beaver Creek Land Use Amendment --Opposition to docketing rezone application,

The item on the table is whether to add the application to the docket, yet the applicant's intended use of the land is inseparable. Thus I will speak to that, the heart of the matter. Summarized, the takeaway is the following paragraph, but I fervently request **all** subsequent points supporting this argument be seriously considered and duly noted.

LAND USE: THE AREA IN QUESTION IS ONE* OF THE LAST VESTIGES OF THURSTON COUNTY'S RURAL LANDS SITTING ADJACENT TO THE I-5 CORRIDOR.

That alone should raise an eyebrow. Inch by inch construction takes place and we lose sight of the whole, when as an afterthought we realize we should've taken a step back to view the big picture.

As our commissioners one of your primary and most important tasks is to base decisions now on that which will benefit the future quality of life in our county. Commit to retaining current land use designations, specifically balancing growth with the future need for rural areas devoid of industrial activity, that were the result of thoughtful deliberations during the comprehensive planning process. ~~~~~

Regarding the application to be considered for the docket, RE: A rezone at Exit 95 Maytown/Littlerock, the big picture:

1.

A mere 4 miles north, Exit 99 (Pilot truck stop), will soon be built up with huge developments. In addition to Pilot truck stop on the NE corner, a huge commercial center is under construction on the NW corner + a huge truck stop is being built on the SW corner. Now the SE corner is in the permitting stage for a giant warehouse or package fulfillment center.

2.

Those developments alone will drive out the 2 nearby family-owned campgrounds that have operated for decades. These campgrounds are just up the road from a well-loved state park.

3.
Traffic there has been an absolute nightmare without those additional developments.
4.
Many rural residents commute using Exit 99 + 95; they use the Maytown exit when there are traffic issues. Traffic problems occur frequently now and will only worsen if both exits are built up.
5.
Incremental development is moving at a fast pace, and in the blink of an eye the rural lands of S. Thurston will be congested with truckers (typically independent contractors) trying to make up drive time by criss-crossing rural back roads.
6.
Industrializing both exits is a sure-fire way to turn RURAL South Thurston into nondescript communities and landscapes, as evidenced from Tumwater all the way north to Bellingham.
7.
Maytown is one of the last remaining S.Thurston exits along the I-5 corridor that present fewer barriers for large mammal movement (elk, bear, cougar) crossing east/west --west/east. Wildlife do not have a fighting chance migrating near the interstate when every exit-junction is obstructed with some form of human activity + traffic. Their corridors are continually shrinking, an grave impingement upon their survival.
8.
Wetlands are extensive in this region of S. County and are vital to replenishing aquifers as well as, maintaining ecosystems and providing wildlife habitat.
9.
The Maytown exit is just a few miles from: WA Dept of Fish & Wildlife's large prairie reserve --which borders an additional 745 acres citizens are trying to preserve; the popular Millersylvania State Park; small scale ranches + farms; undeveloped land; and, many privately-owned conservation-forest tracts. The sum of which comprises several thousand acres, at a minimum.
10.
Littlerock, set in a beautiful rural area, is due west of Maytown, ~6 miles from I-5, and slightly less from the proposed site. The Black River, of paramount priority for watershed conservation, runs through the heart of Littlerock. The area also includes DNR's Glacial Heritage Preserve, Mima Mounds Natural Area, Shotwell's Landing Seed Nursery, and Beaver Creek.
- 11.

The Maytown/Littlerock area is rural, recreational (hiking, boating, hunting, bird watching, fishing, etc) and cottage-industry productive but already squeezed -- shrinking at a fairly rapid pace due to residential construction alone. We, as a community, have an ever increasing need to preserve our county's farmland and surrounding acreage that is vital to its long term survival.

12.

Placing any rezone on the docket that seeks to change Rural to Industrial at Exit 95 misses all that's been elucidated herein, along with the fact that 3 other developments already exist: Old Dominion Freight Line recently completed the construction of a large truck center and repair facility in Maytown; Valley Nuts & Bolts constructed a medium-size warehouse; and the fairly large Freightliners NW exists just on the other side of I-5.

13.

Grand Mound, Exit 88 --just 7 miles south, is the next + last Thurston County exit and although rural, it has been developing commercial properties at a steady pace around that interchange for years and has more in the works.

14.

Thus, Exit 95 Maytown is the least developed area along the I-5 corridor in Thurston (with the exception of Nisqually*, but Nisqually is overrun with traffic congestion from JBLM + Hawks Prairie/Tolmie/Lacey's sizable construction complexes in addition to southbound traffic into Olympia and long-distance I-5 travel (OR, CA + beyond)). Exit 95 allows Interstate travelers a respite from traffic + business congestion; a peaceful place to rest, relax + explore.

15.

In this era of limited travel vacations due to Covid-19, a virus which may not be fully eradicated, county residents have been frequenting their local nature areas more than ever before. The exigency to access unobstructed rural lands is very real --bestowing fresh air + open spaces, scenic landscapes, outdoor recreation, and the essential mental-health relief, i.e., tranquility + sanity. Unfragmented rural expanses are a matter of survival for more than wildlife.

Lastly, PLEASE COMMIT TO PUTTING AN END TO THE EVER INCREASING ONSLAUGHT OF APPLICATIONS THAT SEEK TO ENCROACH UPON WHAT ZONING REMAINS RURAL NON-INDUSTRIAL ALONG THURSTON'S I-5 CORRIDOR. Perhaps this is best done by including language that firms up current comp-plan zoning...?...or in the regs?

Thank you for your attention.

Sincerely,

Meryl Bernstein

Tenino, WA

From: chempleman@comcast.net
To: [Maya Teeple](#)
Subject: Beaver Creek rezone
Date: Friday, March 19, 2021 6:12:01 AM

Board of County Commissioners – I am requesting that you deny the request for rezoning of the Beaver Creek dairy or, at the very least, postpone consideration until 2022. There are a number of good reasons to deny this request, among them:

- Beaver Creek is a salmon bearing creek for which the aquifer recharge in the proposed development area is essential
- It's within a wildlife corridor
- Conversion of those 300 acres is contrary to your stated No Net Loss of Farmland goal
- The draft 2021 Buildable Lands Report identifies capacity for building in current industrial zones even when projected 20 years out, and some of that capacity is in the existing RR1 area at the Maytown intersection

The requested conversion is not needed and is not in the best interest of the residents of Thurston County.

Thank you for your consideration.

Christine Hempleman
SW Olympia

From: [Rebeca Potasnik](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Dairy Farm rezone request
Date: Friday, March 19, 2021 6:48:08 AM

Hello Maya Teeple,

It has come to my attention that the landowners of the Beaver Creek Dairy Farm are seeking a rezone request on this year's docket. I am of the opinion that this request should not be reviewed until 2022 following the community-driven review of agricultural policies and practices as these policies and practices directly relate to this rezone request. Staff should focus on the big picture right now, adhere to the established comprehensive plan, and not engage in potential spot zoning.

As you are well aware, Thurston County is currently losing approximately 3,000 acres of farmland annually. The county recognizes this as a concern, thus the goal of no net loss of farmland. This rezone request is contrary to this established goal. I am also familiar with the draft 2021 Buildable Lands Report which identifies that the county does not need additional rural resource industrial land.

Consideration of this rezone request should not be a priority this year. While it may feel important to the landowner at this time, it is the responsibility of government to prioritize the greater good with an eye to long term vision and the effects on society at large.

Thank you for your service to our community and consideration of my opinion.

In gratitude,
 Rebeca Potasnik
 Thurston County resident since 1992

1. This rezone request would affect 300 acres of existing farmland.
2. There is an existing county goal of no net loss of farmland.
- 3.

Ask that the BoCC not place the Beaver Creek Dairy Farm rezone request on the 2020-21 Docket. Instead, please either remove it from consideration altogether or consider the request when the 2022 Docket is developed. The rezone is contrary to the No Net Loss Goal: There is 300 acres of farmland on the land proposed for rezoning. Loss of this farmland is contrary to the stated No Net Loss of Farmland goal.

The Community-Driven Review of Agricultural Policies and Practices on the 2020-21 Docket Should Be the Focus of Staff and Community Efforts: This request to change farmland into industrial use is yet another sign that Thurston County lacks robust policies and practices needed to preclude farmland loss. The county and the community are working right now to develop new or enhanced

policies and programs to change the picture that results in 3,000 farm acres lost every year. The Community-Driven Review must continue to be a high priority Docket item.

You could also mention that a warehouse (which is what the rezone is designed to accomplish) is not appropriate in the environmentally sensitive area around Beaver Creek.

--

Rebeca Potasnik
360.977.0476
rebeca.potasnik@gmail.com

From: [Ramiro Chavez](#)
To: [Joshua Cummings](#); [Jennifer Davis](#); [Maya Teeple](#)
Subject: FW: Proposed warehouse at exit 95
Date: Friday, March 19, 2021 7:52:46 AM

FYI

Ramiro Chavez, PE, PgMP
County Manager
Thurston County
(360) 754-2960
chavezr@co.thurston.wa.us

From: Thurston County | Send Email <spout@co.thurston.wa.us>
Sent: Thursday, March 18, 2021 3:26 PM
To: Ramiro Chavez <ramiro.chavez@co.thurston.wa.us>
Subject: Proposed warehouse at exit 95

This email was created by the County Internet web server from the email masking system.
Someone from the Public has requested to contact you with the following information:

To: **Ramiro Chavez - County Manager**

Subject:

From: **Rebecca R Turner**

Email (if provided): maytownturners@aol.com

Phone: (if provided): **13609511303**

Message:

County Commissioners:

I'm writing to express my fervent desire to stop the proposed Beaver Creek Land Use Amendment from being docketed, or approved, much less built. This change which would allow an intrusive commercial project at exit 95 on the I-5 freeway. The increase in the amount of truck and other vehicle traffic in and out of such a facility would go a long way towards disrupting and destroying the quiet rural area I choose to live in.

Additionally, it could pose a threat to the salmon in Beaver Creek.

Further, the recent commercial development that is and has been going on at exit 99 (93rd Ave. SW) has made getting on and off at the exit increasingly difficult.

Doing the same thing to the very next exit/entrance at exit 95 will undoubtedly make life difficult for South Thurston County residents here. That would no doubt force more traffic onto 2-lane Littlerock Road, making that route more difficult as well.

Thank you for listening to concerned residents like myself and many others. We are

deeply concerned about maintaining, the quiet, rural nature of life here in South
Thurston County.

Sincerely, Jerry D. Turner Resident since 1960

From: [Felix Mahr](#)
To: [Maya Teeple](#)
Subject: 390 Acre Beaver Creek Rezone Project
Date: Friday, March 19, 2021 7:59:15 AM

Dear Thurston County Planning Commission,

There are many aspects to consider when reviewing the requested rezone. As a wetland consultant and resident of the south County for 30 years, I would like to express my concerns regarding potential impacts to water resources and associated habitat in this area. I have done wetland and stream studies on properties near the proposed rezone. There are numerous wetlands, seeps and streams in this area which need to be protected. Many of these do not appear on Thurston Geodata Center mapping.

I would assume that the applicants have done their due diligence and done site-specific studies to document all critical areas on and adjacent to the project. However, if this has not already been done, I recommend the rezone proposal be deferred until such time as these studies are complete. Based on my experience there typically are more wetlands, streams and seasonal drainages in this area than what is shown on critical area inventory maps.

Sincerely,

Felix Mahr

Land-Tek Wetland Services
PO Box 235
Littlerock, WA 98556

From: [Dale A](#)
To: [Maya Teeple](#)
Subject: Rezoning application
Date: Friday, March 19, 2021 9:09:51 AM

A proposal is being made to change the zoning at the Beaver Creek Dairy Farm adjacent to I-5 exit 95 from Rural Resource (RR) to Rural Resource Industrial (RRI). I am opposed to this proposal and am asking the Thurston County Board of Commissioners to refuse the rezone application. This zoning request should not be fast-tracked ahead of other comprehensive amendments already on the docket. The property is valuable working farmland protected by the Growth Management Act. With new warehousing approved and/or in the pipeline in Thurston County, it seems unnecessary to rush this application onto the '20-'21 docket at the expense of other deserving projects on the docket.

Additionally, this project seems to threaten a wildlife corridor and also potentially damage an aquifer. Warehouses are a dime a dozen. The natural habitat is endangered and needs to be protected before it all disappears. Thank you for your consideration.

Dale A Armstrong, M.D
2706 Hampton CT SE
Olympia, WA 98501

From: [Bill Yake](#)
To: [Maya Teeple](#)
Subject: Decline the re-zone application for the Beaver Creek Dairy Farm
Date: Friday, March 19, 2021 9:31:23 AM

Dear Commissioners,

I respectfully ask you to decline to re-zone for the Beaver Creek Dairy Farm property.

As you may know, Beaver Creek rises from the mostly protected headwaters of Deep Lake (Millersylvania St. Park) and West Rocky Prairie. It hosts a Coho Salmon run and is centered in a recently identified wildlife corridor running from the Black Hills to JBLM.

A detailed 2002 Department of Ecology groundwater study was conducted at the site of the proposed re-zone (Erickson, 2002). The Beaver Creek Dairy site is an aquifer recharge area. Precipitation percolates through the soil replenishing the aquifer. Impervious construction, such as buildings and pavement, will restrict and contaminate the flow of water into the aquifer and consequently into Beaver Creek. According to the above-referenced study, "the stream discharge in summer depends substantially on groundwater inputs" from the stretch of creek on the site. The study estimated 82,000 cubic feet per day of flow from groundwater to the creek along the creek at the site. Depriving the creek of a major portion of flow in the summer due to impervious ground cover could cause substantial deterioration of habitat for salmon and wildlife in and around Beaver Creek.

Extensive impervious surfaces are also likely to increase stormwater flow to the creek. The combined effects of this construction on surface- and groundwater quality and quantity are likely to significantly degrade conditions for salmon and other in-stream fish and wildlife.

I appreciate your consideration of these complex and interrelated environmental concerns, and am hopeful that you will reject this rushed and ill-considered proposal.

Sincerely,

Bill Yake

4032 Green Cove St. NW

Olympia WA

Reference

Erickson D. 2002, Effects of Land Application of Dairy Manure and Wastewater on Groundwater Quality--Pre- and Post-Animal Waste Holding Pond Monitoring. Washington State Department of Ecology Pub No. 02-03-002. 123 p.
<https://apps.ecology.wa.gov/publications/documents/0203002.pdf>

From: [virginia mccabe](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Farm Rezoning
Date: Friday, March 19, 2021 10:53:34 AM

Dear Ms. Teeple:

Please deny the Thurston County Commissioners request to rezone this 390 acre farm to rural resource industrial.

Thurston County has historically been an agricultural county, with many areas still being actively farmed. As we are losing our arable land daily to development it is critical we safeguard our remaining rural lands. Industrial interests are not compatible with clean water and a safe environment for native species, no matter what spin those industries put on their “clean and green” practices.

Please help protect Thurston County’s remaining undeveloped areas by refusing this request.

Thank you very much for your time.

Sincerely,

Virginia McCabe
360-357-6431

March 19, 2021

Subject: Beaver Creek Dairy Land Use Amendment Proposal

Dear County Commissioners and Land Use Designation Partners:

I write in opposition of placing the Beaver Creek Land Use Amendment Proposal on the preliminary docket as it is counterproductive to the County's Goal of "No net loss of farmland." This zoning change, from 1 house per 5 acres to Rural Resource Industrial, gravely hinders the future of agriculture in Thurston County. This further would cause the loss of almost 400 acres of Historical Agriculture property in the county and significantly increase the property value, thus hindering it's sale as a Agriculture property.

I am first generation cattle rancher who resides and raises cattle in Thurston County. Our family operates a "Cow-Calf to Pasture Finish" operation and sell beef locally to residents in this county. Currently we graze approximately 325 acres of leased pastures. These pastures are owned by private land owners, municipalities, and conservation groups. Our grazing practices, which we describe as Prescribed Rotational Grazing, responsibly make use of ground which would otherwise not be suitable for crop production. As a first generation rancher, we have worked hard since 2000 growing our business and providing food for our ever-growing population. One of our greatest long-term struggles is purchasing agriculture property in Thurston County as land prices are extremely high and pose a grave hurdle for new farmers and ranchers in this county.

The owner of Beaver Creek Dairy, Chris Doelman, spoke so well in a 2018 interview "I strongly agree in playing the Infinite game, not the Finite game."[\(https://coachkimmyelp.com/2018/08/21/dairy-farm-management/\)](https://coachkimmyelp.com/2018/08/21/dairy-farm-management/)

Chris went on to recently provide public comment at the Thurston County Agriculture Committee Public Meeting on 3-18-21. Chris stated during his comment that Dairy Farming on the I-5 Corridor is not sustainable. He further went on to state the Agriculture Committee should be interested in "taking care of the farmer." When asked if Chris had listed his farm for sale, placed it on public farmer-matching sites like Washington State Farm Link (which works to link new and growing farmers with property owners who are leaving agriculture) or spoke with Conservation groups about working to find a farmer or rancher to take over his farm he said "No I have not." When asked if Chris was interested in a farmer using part of his property for agriculture production he stated, "No." Chris went on to state that he would only sell his property at "fair market value."

Currently Beaver Creek Dairy is an operational dairy utilizing approximately 400 acres. Chris testified at the Agriculture Committee Hearing that without cattle and the organic matter they distribute on the soils of his property, this land would not be appropriate for crop production.

Additionally, Doelman Dairy use to own property near the Black Hills High School. This property is slated for the proposed conversion of Agriculture production ground to over 1,500 homes <https://www.theolympian.com/news/business/article240493616.html>) and the further loss of an additional 300 acres of Agriculture production ground.

I believe that just as Chris Doelman stated that one needs to look at the "Infinite game," so should Thurston County as it evaluates the critical need to look at preserving agriculture use ground.

Furthermore, a re-zoning of this currently proposed, nearly 400 acre piece of agriculture ground will only make it harder and more expensive for farmers to purchase ground. As Chris stated during the Agriculture Committee meeting, "This group should be more concerned about the farmer."

I implore the Commissioners and Land Use Designation Partners to postpone or deny the re-zone of this approximate 400 acres of agriculture ground in Thurston County. Help to preserve what Agriculture Ground is present in the this county and help to address this crisis, which is our loss of Agriculture Ground in Thurston County. Please help to support your Farmers and not those that are interested in Development of Agriculture Ground in Thurston County.

Thank you for your time,



Jake Yancey
Tracking Y Ranch
Cow-Calf-to Pasture Finish Beef Producer
Local Beef Sales
Thurston County Farmer

From: [Alex Foster](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Farm
Date: Friday, March 19, 2021 11:08:26 AM

Maya Teeple | Senior Planner
Thurston County Community Planning & Economic Development
Community Planning Division

Subject: Rezone of the Beaver Creek Farm

Dear Ms Teeple:

I strongly suggest that the Beaver Creek Dairy Farm rezoning request **not** be added to the 2021 planning docket.

As you know, agriculture lands in Thurston County will be under review starting this year. Rezoning this farm conflicts and/or side steps that review process. I reflect in horror at the rate of farmland conversion along the Green/Duwamish and Puyallup river flood plains to the north, and suggest that the county-wide agricultural lands review process needs to happen prior to this zoning decision.

I understand a farm is a business like any other, but in rezoning agriculture land to other uses, environmental factors should be considered on par with economics. For example, this farm has critical habitat for the Oregon spotted frog along Beaver Creek. By delaying this rezone to the 2022 docket, a conservation easement or acquisition by a land trust could be adopted to preserve that portion of the farm. Furthermore, I am concerned about chemical spills and toxic runoff from an industrial or warehouse facility entering Beaver Creek directly or entering the groundwater in the recharge area. This has happened repeatedly along the Green/Duwamish and Puyallup Rivers mentioned above.

Thank you for the opportunity to comment.

Sincerely,

Alex D Foster
16206 163rd Lane SE
Yelm, WA 98597

From: [Greg](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Dairy property rezone
Date: Friday, March 19, 2021 11:08:54 AM

Dear Commissioners.

I am asking you to not approve the re-zone for the Beaver Creek Dairy Farm property.

The proposal is to build a large warehouse on land that has been farmland and has a salmon-bearing creek, Beaver Creek, flowing through it. A large warehouse and paved area would restrict water flowing into the aquifer that supports Beaver Creek, which is supported in a large part by groundwater recharge. The creek is already at low flows for salmon spawning and wildlife who use the creek habitat. Additional development will likely add to contamination of the groundwater and lessen the water quality in the creek as well.

With more and more people populating the county, it is important that we protect these critical islands of natural habitat.

I appreciate your consideration of the environmental impacts of this proposed re-zone.

Sincerely,
Greg Sorlie, Gale Blomstrom
4227 Amber Court SE
Olympia WA 98501

From: [David Seiler](#)
To: [Maya Teeple](#)
Subject: Rezone of 390 acres in Thurston County near Maytown
Date: Friday, March 19, 2021 11:21:33 AM

I am writing to urge the Thurston County Commissioners to reject the request to rezone 390 acres of a rural farm parcel to rural industrial. Development of this property will have a permanent deleterious effect on salmon production in Beaver Creek. I am a retired Salmon Scientist who for 30 years led the Washington Department of Fish and Wildlife's Wild Salmon Production and Survival Evaluation Program. This program measured wild salmon production in numerous watersheds throughout the state. For coho salmon, the Chehalis Basin was found to be the most productive in the state. Over many years, this watershed has produced an average of 2 million coho smolts each year. Within this system, Beaver Creek was found to be among the highest annual producers of coho salmon.

Salmon production is a function of stream health. As natural watersheds are transformed from rural to urban, salmon production declines. Degradation of stream habitat takes many forms: siltation, warming through loss of shade, and alteration of stream flows. Coho salmon spend 18 months, half of their three year life in freshwater. Therefore, they are particularly vulnerable to degradation of stream conditions. Rezone of this parcel is counter to any plan to protect or recover salmon in Washington State, therefore I request this rezone be refused.

Sincerely David Seiler

I also request that the Thurston County Commissioners refuse this request to rezone this 390 acre parcel in Southern Thurston County. I agree with all that David Seiler states above, and have additional concerns.

In addition to what David Seiler says above, I have concerns about the effect of runoff on salmon smolts and adults. In my over 30 year career with the Department of Ecology in the Hazardous Waste Program, I dealt with the effects of toxics on natural systems, as well as humans. Studies have shown that the wear of tires produces particles that are particularly toxic to salmon and invertebrates essential to the natural system. The first flush rains in the I-5 corridor have already caused returning salmon deaths. High amounts of large truck traffic, parking lots and associated logistics in this area could be another of the thousand cuts to the health of this stream.

The effect of reduction of salmon production within this stream affects the level of salmon production for the Chehalis, which then affects salmon production overall. Salmon have seen continued reductions in abundance which has affected many aspects of our lives, including Orca viability.

The effects of a significant increase of large truck traffic to this rural area, which includes Millersylvania, and the ScatterCreek Wildlife area, is also a concern. This interstate interchange is not set up for the traffic level that is being considered should this rezone occur. A change of the interchange means more traffic, changing the whole character of the south county.

During the past year of covid it has been apparent that the open areas of Thurston County have been overwhelmed. We are not keeping up with development of parks or maintaining open

spaces. This is just another development that will change our rural area and reduce the potential for an open space.

For the salmon, and for the Orca which depend on the salmon, and for us, I ask that this rezone not be granted. Thank you.

Sincerely K Seiler

From: [David Seiler](#)
To: [Maya Teeple](#)
Subject: Fwd: Rezone of 390 acres in Thurston County near Maytown
Date: Friday, March 19, 2021 2:34:04 PM

Here are some additional comments on our request to reject the rezone: Coho salmon are important to tribal fisheries in the Chehalis and Grays Harbor, and to non-tribal recreational and commercial fisheries coastwide. Due to the high productivity of Beaver Creek any impact on this creek affects the above. "The Washington Coast Sustainable Salmon Plan, developed with input from local jurisdictions, indicates that commercial development is a critical threat to salmon sustainability in the Washington Coast Region, including the Chehalis River Basin. Further, the plan states that farm land is far more beneficial and preferable for salmon than an urbanized environment." Thank you for rejecting this development. Katherine and David Seiler

----- Forwarded message -----

From: **David Seiler** <kndseiler@gmail.com>
Date: Fri, Mar 19, 2021 at 11:21 AM
Subject: Rezone of 390 acres in Thurston County near Maytown
To: <maya.teeple@co.thurston.wa.us>

I am writing to urge the Thurston County Commissioners to reject the request to rezone 390 acres of a rural farm parcel to rural industrial. Development of this property will have a permanent deleterious effect on salmon production in Beaver Creek. I am a retired Salmon Scientist who for 30 years led the Washington Department of Fish and Wildlife's Wild Salmon Production and Survival Evaluation Program. This program measured wild salmon production in numerous watersheds throughout the state. For coho salmon, the Chehalis Basin was found to be the most productive in the state. Over many years, this watershed has produced an average of 2 million coho smolts each year. Within this system, Beaver Creek was found to be among the highest annual producers of coho salmon.

Salmon production is a function of stream health. As natural watersheds are transformed from rural to urban, salmon production declines. Degradation of stream habitat takes many forms: siltation, warming through loss of shade, and alteration of stream flows. Coho salmon spend 18 months, half of their three year life in freshwater. Therefore, they are particularly vulnerable to degradation of stream conditions. Rezone of this parcel is counter to any plan to protect or recover salmon in Washington State, therefore I request this rezone be refused.

Sincerely David Seiler

I also request that the Thurston County Commissioners refuse this request to rezone this 390 acre parcel in Southern Thurston County. I agree with all that David Seiler states above, and have additional concerns.

In addition to what David Seiler says above, I have concerns about the effect of runoff on salmon smolts and adults. In my over 30 year career with the Department of Ecology in the Hazardous Waste Program, I dealt with the effects of toxics on natural systems, as well as

humans. Studies have shown that the wear of tires produces particles that are particularly toxic to salmon and invertebrates essential to the natural system. The first flush rains in the I-5 corridor have already caused returning salmon deaths. High amounts of large truck traffic, parking lots and associated logistics in this area could be another of the thousand cuts to the health of this stream.

The effect of reduction of salmon production within this stream affects the level of salmon production for the Chehalis, which then affects salmon production overall. Salmon have seen continued reductions in abundance which has affected many aspects of our lives, including Orca viability.

The effects of a significant increase of large truck traffic to this rural area, which includes Millersylvania, and the ScatterCreek Wildlife area, is also a concern. This interstate interchange is not set up for the traffic level that is being considered should this rezone occur. A change of the interchange means more traffic, changing the whole character of the south county.

During the past year of covid it has been apparent that the open areas of Thurston County have been overwhelmed. We are not keeping up with development of parks or maintaining open spaces. This is just another development that will change our rural area and reduce the potential for an open space.

For the salmon, and for the Orca which depend on the salmon, and for us, I ask that this rezone not be granted. Thank you.

Sincerely K Seiler

From: [Larry Remmers](#)
To: [Maya Teeple](#)
Subject: Beaver creek farm rezone
Date: Friday, March 19, 2021 11:22:31 AM

Dear Ms. Teeple

As a resident of Thurston county, I am writing to express my concern over the proposed Beaver Creek Farm rezone, and its impact on rural Thurston county. I have two areas of focus: degradation of the environmental quality and rural character within (and beyond) the rezone and consequential traffic issues.

We have all seen what has happened in King and Pierce counties. Their rampant development and the resulting traffic congestion has negatively impacted the environment and quality of life in these areas. Thurston has a choice; we can learn from their errors and avoid this outcome or lose our identity and become a mere extension of it. Changing zoning in a rural area can be the disastrous first bite in the "gobbling up" process that leads to conversion from rural to urban/industrial. It is especially worrisome here, as the rezone is included in a larger natural area which contains our beautiful Millersylvania Park , and Coho bearing Beaver Creek.

As to my second concern, traffic impacts. In our area access onto and off the freeway are the following : Maytown, 93rd. ave, Tumwater Blvd. and Trosper Rd. The status of each one is already impacted with traffic congestion as the area grows, but will become even more challenged if Maytown becomes commercially developed .The large truck presence as well as other vehicles will cause people to use other routes. 93rd. Ave. already has a large semi truck servicing center on the east corner of the freeway which currently causes congestion, and one is being constructed on the west side which will only exacerbate the problem. That moves traffic to use Tumwater Blvd. which has its own set of traffic problems, especially at commute times for state workers. More traffic funneled here will create a major congestion point. And then there is Trosper Rd.. It currently has a very real congestion problem with backups at the intersection of Trosper and Littlerock Rd. and the freeway. And, as you are probably aware, there is considerable housing development taking place on Littlerock Rd. which will add even more traffic to the mix. These considerations must be taken into account or we will suffer the same problems as our neighboring counties to the north. What you decide will shape the future of rural thurston county forever. So please make the responsible choice and reject the request for rezone.

Very sincerely,
Linda Remmers

From: [Cindy Wills](#)
To: [Maya Teeple](#)
Subject: Rezoning near Beaver Creek
Date: Friday, March 19, 2021 11:48:42 AM

I am writing to urge the Thurston County Commissioners to reject the zoning change request proposed in the Beaver Creek area west of I-5. I agree with my south county neighbors, Dave and Kay Seiler arguments below. I am also concerned about the loss of habitat, currently being hugely impacted by the massive logging in Capital Forest, and the increased use of public lands by people attempting to find peace and exercise in socially distanced settings. Wildlife increasingly will be interacting with residents of the area as their own habitat is lost. Increased night lighting by the proposed developments will impact wildlife negatively as well as residents of the area who live here because it is rural. Littlerock Road and Old 99 are already the alternatives to I-5 during increasing closures, due to wrecks in the Tumwater area of I-5 and the intersection of Exit 95, and are not designed to replace the interstate.

Sincerely
Cindy Wills

I am writing to urge the Thurston County Commissioners to reject the request to rezone 390 acres of a rural farm parcel to rural industrial. Development of this property will have a permanent deleterious effect on salmon production in Beaver Creek. I am a retired Salmon Scientist who for 30 years led the Washington Department of Fish and Wildlife's Wild Salmon Production and Survival Evaluation Program. This program measured wild salmon production in numerous watersheds throughout the state. For coho salmon, the Chehalis Basin was found to be the most productive in the state. Over many years, this watershed has produced an average of 2 million coho smolts each year. Within this system, Beaver Creek was found to be among the highest annual producers of coho salmon.

Salmon production is a function of stream health. As natural watersheds are transformed from rural to urban, salmon production declines. Degradation of stream habitat takes many forms: siltation, warming through loss of shade, and alteration of stream flows. Coho salmon spend 18 months, half of their three year life in freshwater. Therefore, they are particularly vulnerable to degradation of stream conditions. Rezone of this parcel is counter to any plan to protect or recover salmon in Washington State, therefore I request this rezone be refused.

Sincerely David Seiler

I also request that the Thurston County Commissioners refuse this request to rezone this 390 acre parcel in Southern Thurston County. I agree with all that David Seiler states above, and have additional concerns.

In addition to what David Seiler says above, I have concerns about the effect of runoff on salmon smolts and adults. In my over 30 year career with the Department of Ecology in the Hazardous Waste Program, I dealt with the effects of toxics on natural systems, as well as humans. Studies have shown that the wear of tires produces particles that are particularly toxic to salmon and invertebrates essential to the natural system. The first flush rains in the I5 corridor have already caused returning salmon deaths. High truck traffic, parking lots and associated logistics in this area could be another of the thousand cuts to the health of this stream.

The effect of reduction of salmon production within this stream affects the level of salmon production for the Chehalis. which then affects salmon production overall. Salmon have seen continued reductions in abundance which has affected many aspects of our lives, including Orca viability.

The effects of a significant increase of large truck traffic to this rural area, which includes Millersylvania, and the ScatterCreek Wildlife area, is also a concern. This interstate interchange is not set up for the traffic level that is being considered should this rezone occur. A change of the interchange means more traffic, changing the whole character of the south county.

During the past year of covid it has been apparent that the open areas of Thurston County have been overwhelmed. We are not keeping up with development of parks or maintaining open spaces. This is just another development that will change our rural area and reduce the potential for an open space.

For the salmon, and for the Orca which depend on the salmon, and for us I ask that this rezone not be granted. Thank you.

Sincerely K Seiler

From: [Larry](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Re-zone application
Date: Friday, March 19, 2021 12:01:24 PM

Dear Thurston County Commissioners:

I write to request you deny the application to rezone the Beaver Creek Dairy Farm property, formerly operated under the land stewardship of the Doelman family, from Rural Resource (RR) to Rural Resource Industrial (RRI).

This rezone would allow the building of a large warehouse and distribution center. This significant land use change would 1) create acres of impervious surface development, thereby restricting aquifer recharge, 2) diminish water quality and quantity entering the Beaver Creek drainage, and 3) increase the likelihood of chemical contamination of both groundwater and surface water through surface runoff.

Decreased precipitation and increased summer temperatures in our county due to climate change will continue to have adverse effects on already stressed habitat, resulting in diminished overall health for fish and wildlife. Rezoning this land to allow industrialization will only exacerbate this reality, which I believe is contrary to our overall goal of maintaining a sustainable environment for all.

Thank you for your thoughtful consideration.

Sincerely,

Larry Goldstein
436 72nd Way NE
Olympia

From: [Marilyn Miller](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Farm zoning
Date: Friday, March 19, 2021 12:02:37 PM

Hello, Ms. Teeple,
I am **opposed** to rezoning of the Beaver Creek Farm.

--

Marilyn Miller, Olympia

From: jgreen2317@aol.com
To: [Maya Teeple](#)
Cc: [Thomasina Cooper](#)
Subject: Rezoning of farmland near Exit 95
Date: Friday, March 19, 2021 12:04:11 PM

To Maya Teeple,

I would like to comment on the request to rezone a 390 acre piece of farmland from rural residential to rural resource industrial. This change would be a terrible mistake in long range planning. Not only will we lose the valuable resource of habitat for wildlife, green space for carbon storage to mitigate warming climate, and potential farmland for future needs, we will have the negative impacts of added traffic, diesel pollution, noise, and landscape change. This would be a very short-sighted action and poor use of this resource.

I encourage rejection of this request.

Thank you for considering my comment.

Regards,

Margaret Green

4732 Orcas Ct. NE

Lacey, WA 98516

360-430-0890

From: [Nathaniel Jones](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Dairy Farm rezone proposal
Date: Friday, March 19, 2021 12:19:23 PM

Ms. Temple,

Thank you for this opportunity to comment on the Beaver Creek Dairy Farm rezone proposal. This proposal should not be included in the 2021 docket of zoning revisions. The docket is full and prioritizing a new proposal of this magnitude would not be appropriate.

Further, the proposed rezone would be counter to the stated goals of the County for farmland preservation, fails to recognize the character of the area, would likely be ruled as spot zoning, and does not recognize that there is plenty of industrial zoning in other regions of Thurston County. For these reasons, I recommend that the proponent be advised that the rezone idea will likely fail approval, now and in the future, and should be withdrawn altogether.

Nathaniel Jones

From: [Gordon White](#)
To: [Maya Teeple](#)
Subject: Comment on Proposed Beaver Creek Land Use Plan and Rezoning Amendment
Date: Friday, March 19, 2021 12:24:46 PM

Ms Teeple

I am commenting on the proposed Beaver Creek: Land Use Plan and Rezoning Amendment Applicant: HW Seattle. There are several issues that this proposal creates that make it inappropriate for changing the current plan and zoning designation.

Lack of need

Currently there is no need for the intended use to create a warehouse distribution center. Thurston Regional Planning Council 2021 Buildable Lands Report finds there is sufficient land zoned in the urban areas of Thurston County for 20 years of growth for this type of activity. Just north of this proposal on 93rd avenue and I-5 is a warehouse district with over 1million square feet of space nearing completion. Importantly it is in the urban growth areas that transportation and other infrastructure for such uses is best accommodated and planned. The proposal does not fill a new need not already addressed in the existing Comprehensive Plan. HW Seattle has not provided any information on how the proposal fits a land use need not already met by existing plan and zoning designations. The proposal and related enterprises are not needed and would harm the rural agricultural uses in the Beaver Creek area.

Threat to salmon bearing streams and drinking water not addressed

Another key issue is the environmental impact of creating an industrial warehouse district in this area. Impacts from such uses can already be seen by the failure of the nearby Freightliner Northwest site to comply with stormwater and habitat requirements protecting Beaver Creek. Past and current operations on that sight have encroached on Beaver Creek buffers and caused water quality to be harmed. The site location for the proposed plan amendment would offer even more challenges given the topography and direct access to Beaver Creek. HW Seattle has not provided an assessment of how they would protect Beaver Creek, surrounding habitats and drinking water supplies.

In summary, the proposed amendment is not needed, potentially threatens Beaver Creek and does not meet the requirements for a plan or zoning code amendment.

Gordon White
Olympia, Wa

From: [Thurston County | Send Email](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Dairy Farm: request for re-zoning
Date: Friday, March 19, 2021 3:14:20 PM

This email was created by the County Internet web server from the email masking system. Someone from the Public has requested to contact you with the following information:

To: **Maya Teeple**

Subject:

From: **Jennifer Lyne, EdD**

Email (if provided): jenlyneviola@gmail.com

Phone: (if provided): **3604023687**

Message:

Regarding the re-zoning request of Beaver Creek Farm: I oppose the re-zoning of the area known as the Beaver Creek Dairy Farm on Maytown Rd. If that isn't possible, I request that the BoCC move it from the 2020-21 docket to the 2021-22 docket in order for accurate and up to date information to be presented to the BoCC. Information is needed regarding what the impact the addition of a huge industrial complex and all that is required to support and run it would have on endangered species (e.g., Oregon Spotted Frog), Coho salmon, federally protected wetlands, the quality of life currently enjoyed by area residents in the RRR/1-5 zoning, and other appropriate and important environmental concerns. There is no need to rush in to a decision: please collect all of the information! Thank you.

From: [H saunders](#)
To: [Maya Teeple](#)
Subject: Subject: Refuse the re-zone application for the Beaver Creek Dairy Farm
Date: Friday, March 19, 2021 12:32:54 PM

Dear Commissioners,

I'm asking you to refuse the re-zone for the Beaver Creek Dairy Farm property. I retired from the Thurston County Health Department in 2019 and have monitored Beaver Creek many times (as well as conducting a great deal of ground water monitoring in South County). It's a lovely creek and it is heavily dependent on recharge from Ground Water particularly during the summer. I believe Ecology did a study on this, although I'm unable to reference the study in this email. Any pavement or buildings, which are impervious surfaces, will impact the creek a lot, especially during the summer. Even if "pervious pavement" were installed, the water quality will be impaired.

We have already constructed a LOT of industry in inappropriate places. I would encourage you to find places where there are existing protective layers (like tight clay layers or silt layers) for this type of development. Used in combination with engineered solutions, they at least decrease potential damage. Clean-up (no matter who pays) is generally both less effective than prevention and EXPENSIVE, and usually the tax payer (like me and you) end up picking up at least part of the bill.

Let's protect the creek, the salmon, the wildlife by not approving this rezone and save ourselves both damage and money in the long run. Besides the fact that we will need prime agricultural land in the future.

Sincerely,

heather S. Saunders

1620 Woodard Lane NW #E-4

Olympia, WA 98502

From: [M. Taylor Goforth](#)
To: [Maya Teeple](#)
Subject: No rezone for Beaver Creek Farm
Date: Friday, March 19, 2021 12:56:37 PM

Hello Maya Teeple:

I am writing to ask that the Beaver Creek Dairy Farm remain as farml and and NOT be rezoned this year or next. A rezone of the 300 acres of farmland on the land is contrary to Thurston County's No Net Loss of Farm land goal.

Farm land in Thurston County is extremely valuable to our community's climate crisis resilience and food security and should not be developed. Our discussions to date with the Commission state that most citizens are interested in keeping farm land farm land and are establishing goals for policy changes to this effect right now.

We cannot undo a wrong development in the time we have left to make the right decisions for our community's future. Now is that time. Do not rezone. Let farm land remain farm land.

Thank you,
Mary-Taylor Goforth

From: [Jean MacGregor](#)
To: [Maya Teeple](#)
Subject: Comment: Re-Zone Beaver Creek Dairy Property
Date: Friday, March 19, 2021 1:28:39 PM

This is a comment on the proposed fast-tracking of a change in the zoning at the Beaver Creek Dairy Farm property adjacent to I-5 south of Tumwater; it would change the zoning designation from RR to RRI.

I would like to go on record as opposing this rezone, for the following reasons.

1. **This property is rural farmland.** The Growth Management Act guidelines, in place for many years, seek to protect rural and agricultural lands. As climate change increases, our remaining local farmlands will become ever more valuable and important for local sustainable agriculture. Turning more valuable Thurston County farmland into other uses, in this case enormous warehouses with paved parking, loading, and driving areas is not good decision-making for the long term. We should be protecting our remaining County farmland, not paving it over!
2. **This property is part of a valuable corridor for wildlife.** I have visited the south County for many years to observe wildlife. Any kind of industrial complex at this site would interfere with the natural movement of mammals, birds, and butterflies in this neighborhood. The noise, air, and light pollution of a warehouse would disrupt wildlife and contribute to the destruction of this wildlife corridor.
3. **This property contains valuable wetlands:** Even with the minimally required buffers to the wetlands, a large industrial complex with its associated air, noise, and light pollution, and its thousands of square feet of impervious surfaces will harm the wetlands.

For these reasons, I request that the re-zoning application be rejected.

Thank you,

Jean MacGregor
Thurston County Resident

From: starshipaj@aol.com
To: [Maya Teeple](#)
Subject: Rezoning of near Maytown
Date: Friday, March 19, 2021 2:05:22 PM

Dear Maya Teeple:

I am writing to oppose the rezone of the land near Maytown. It seems to me that rezoning this area to industrial would be a violation of the Growth Management Act. These laws were put in to stop urban sprawl, and to preserve the rural areas. If we don't start enforcing the growth management laws now, in de facto, there will be no more growth management act. We must say no to the irrevocable decisions that turn our entire county into an unplanned urban mess.

Thank you,
Andy Jacobson
Clara Jacobson
Lawrence Jacobson

From: rscole@scattercreek.com
To: [Maya Teeple](#)
Subject: Rezone of Beaver Creek Dairy property
Date: Friday, March 19, 2021 2:15:09 PM

I live in semi-rural Thurston county and am opposed to rezoning the Beaver Creek Dairy property.

1. This is currently rural farmland, and we don't need to create another industrial slum there with warehouses, day-and-night traffic and air, water and noise pollution. Rezoning would not be in accordance with Growth Management Plan act. Keep this land rural – we will need it in times of climate change.
2. Wildlife, including salmon in Beaver creek, will be harmed by the needless development proposed. I spend a lot of time in the county watching wildlife, and I would hate to see another wildlife zone destroyed by ill-advised development.
3. This area is currently important for groundwater recharge. I live in a different area of the county, but I depend upon a groundwater well for domestic usage. I pay attention to issues surrounding groundwater recharge, and you at the county need to do so also.

I strongly oppose the idea of rezoning rural farmland to industrial usage.

Sincerely,

Robert S. Cole
533 Olmstead Ln SW
Olympia, WA 98512
rscole@scattercreek.com

From: [Tony Wilson](#)
To: [Maya Teeple](#)
Subject: Beaver Creek Farms rezone docket
Date: Friday, March 19, 2021 2:22:26 PM
Attachments: [Beaver Creek Farms.odt](#)

Good afternoon Maya,

I have prepared comments regarding the docketing request for Beaver Creek Farms on Case Road. I am going to cut and paste it here and attach it as well. I really don't know which method is preferable.

I am writing today in support of the proposal to docket the rezone proposal of the several parcels located at 13333 Case Rd SW, Olympia WA 98512, and belonging to Beaver Creek Farms.

As I understand it the proposal is only to docket the requested zoning change for consideration by CPED and the elected Thurston County Commissioners. That said, we must consider a broad slate of interests among many stakeholders, including the interests of the landowners.

While many of my "liberal" friends hold a different point of view in this matter I believe that the landowners do have a right to seek reasonable consideration of their zoning request.

I believe that the landowners of this parcel are making a legally supportable request. They are no longer able to make a living operating the site as a dairy and wish to sell it for another purpose; one that is more in keeping with it's "highest and best use". As I understand it, they have been unable to sell their property at an acceptable price to another farmer and it seems that they cannot do so in a reasonable time. Dairy farming there has ceased as it has become unprofitable to continue it. It is also unlikely that the land is likely to be sold to a residential builder due to its contiguous proximity to another RRI zoned site and the Interstate 5 corridor and intersection with Maytown. Residential development within the current zoning is unlikely. It also seems that this site isn't well suited for land trust protection as it is not adjacent to a major waterway. The result is that the owners continue to experience costs with no means to balance those costs with farm based income.

As we all know, the RRI zoning was put into the code in 1998. This zoning ordinance was designed to protect the rural nature of the county while still allowing for normal growth of industrial facilities in the county. A quick read of the ordinance shows that it can do what it was designed to do. RRI is limited to areas within a half mile of the I-5 corridor and defines the accepted uses. Beaver Creek Farms fits the ordinance pretty well from what I read. The land is also contiguous with another 500 +/- acre site also designated as RRI, a further cause for eventually granting the zoning change.

In addition, over the last 20+ years, American culture has undergone significant change. We all shop at the so called "big box" stores and those places require shipment of goods to them. We made decisions as a culture that dictate that warehouse districts must exist somewhere. As this region of Washington continues to grow, so must distribution of goods. This site seems to be one well suited for the requested zoning to support the inevitable growth in the most popular state in our nation.

I believe that if docketed, the opportunity then exists for the state DFW, Department of Ecology, tribal interests and all other stakeholders to contribute to the conversation in order to protect all our interests while also supporting balanced and reasonable growth of the economic infrastructure of Thurston County.

Thank you for your consideration of my comments,

Tony Wilson

740 89th Avenue SW

Olympia WA 98512

March 18, 2021

To: Maya.Teeple@co.thurston.wa.us.

RE: 390 Acre Industrial Development, Exit 95

I am opposed to the proposed rezoning. I am a neighbor in the immediate vicinity of this proposed development and find it ill conceived. Development interests are tireless in their efforts to maintain continued unrestrained growth. Previous commercial proposals on the old Pacific Power Company site and the massive industrial development of a Port of Tacoma Transload facility were defeated with adequate cause. Now comes another development plan to permanently alter the rural agricultural environment of south Thurston County and promote uncontained urban sprawl. This constant barrage of development proposals by development interests and supported by County proponents, counts public fatigue. This strategy is further exacerbated by the Covid pandemic as many people are preoccupied by more pressing personal needs. Any further development at Exit 95 will significantly impact the rural character of Agritourism District designation.

This proposal will adversely impact the lives of the local residence. It will , in essence, be subsidized by them with a reduction in the quality of life and related property values. Will the Thurston County Assessor's Office reflect the reduction in property values? The development will further stress an inadequate access point to I-5. It will require massive expenditures of taxpayer resources to upgrade the transportation infrastructure, another taxpayer subsidy.

Exit 95 is a Killer. Multiple fatality accidents have occurred at this location over the years and will increase as a result of this proposal. People will die. Cumulative effects, such as the tagged truck traffic from the new Old Dominion facility, have to be considered and an Environmental Impact Statement prepared. This proposal cannot qualify for a Determination of Non-Significance.

Non-enforcement Construction/Industrial Stormwater permits (Ecology) Old Dominion and Other Amazon Facilities, failed to perform enforcement mandate, abject lack of enforcement.

Another unmitigatable impact will be the massive adverse effect on the healthy salmon population of Beaver Creek. Billions of public funds have been spent to restore salmon runs. This proposal will significantly damage a healthy sustainable population of coho salmon, cutthroat and steelhead trout. Millions of dollars of taxpayer money was spent last fall to replace a fish blocking culvert just a short distance away from the proposed development site. If this proposal goes through, all that money will be potentially wasted. This makes no sense and is negligent public policy. This watershed is already under severe risk and stress from the proposed Chehalis River dam. Beaver Creek is one of the largest salmon producing tributaries to the middle stem of the Chehalis River.

Related to the salmon concerns is the issue of the riparian zone and associated jurisdictional wetlands on the site. The setbacks from these critical areas and required onsite stormwater infrastructure will make the site unsuitable for extensive industrial development, unless the County supports a variance or exemption from the rules.

Enforcement of environmental laws and permits is another issue of grave concern. Enforcement routinely falls victim to the political winds and economic recessions. Thurston County failed to enforce the operating restrictions on the Mobile Mini facility. The Department of Ecology has effectively abandoned their enforcement mandate when it comes to the Construction Stormwater General Permit and the Industrial Stormwater General Permit. Both these permits would be required for this proposal. The Old Dominion, Maytown facility failed to get a construction stormwater permit and neighbor complaints about the illicit discharge were ignored by Ecology. The facility is illegally currently operating without a required industrial stormwater permit.

There are many other more suitable locations for proposed south county industrial development. Both the intersections at 93rd and Grand Mound have recently been upgraded with the necessary safety and capacity improvements. Neither of these locations are adjacent to surface waters or salmon-bearing streams. Thurston County does not need more industrial development, but well reasoned growth that is compatible with the needs of the local residents. This proposal is not that.

Sincerely,

Paul Stasch

From: [Tom Burns](#)
To: [Maya Teeple](#)
Cc: [Dave Seiler](#) ; [Jan Black](#)
Subject: Comments Regarding the Proposed Rezoning of the Beaver Creek Farm
Date: Friday, March 19, 2021 2:47:23 PM

Maya,

Please forward the following are comments to the Thurston County Commissioners and urge them to vote NO on the proposed rezoning of the 390 acre property locally known as the “Beaver Creek Farm” from Rural Residential to Rural Resource Industrial:

- The property along with the access to Exit 95 is a wildlife corridor (from the west to the east of I-5) and needs to be maintained. The health and welfare of wildlife would be impacted by the proposed zoning by reducing the habitat and that corridor.
- Beaver Creek which flows through the property is one of the most highly productive wild coho streams in the entire Chehalis Basin. Highly productive salmon streams in the Puget Sound Basin have been destroyed by “Rural Resource Industrial Conversion”. One primary example of this is the Kent Valley and the Green River System. Wild coho populations in Puget Sound have plummeted due to such rezoning with many of those populations becoming extinct. Beaver Creek would be heavily impacted by diesel and other pollutants draining from a warehouse development despite any mitigation effort such as storm water retention/detention facilities ponds et. al.
- The rezoning would impact the aquifer recharge area, a source of clean drinking water for our southern Thurston County neighbors. Clean drinking water must be protected from such proposed zoning.

Thank you for allowing me to comment.

Sincerely,

Thomas Burns, Thurston County Resident

From: [Susan Markey](#)
To: [Maya Teeple](#)
Subject: Thurston County Comprehensive Plan 20-21 Comp Plan Docket Addition Request - Comments
Date: Friday, March 19, 2021 3:00:48 PM

Dear Thurston County Commissioners Menser, Edwards, and Mejia:

Please reject the application from Beaver Creek Farms to add its rezone request to the 2020-2021 Comprehensive Plan Amendment Docket.

A rezone from Rural Resource to Rural Industrial poses many serious environmental concerns such as effects on drinking water sources, fish habitat degradation, and incompatibility with neighboring properties. Also, the administrative precedent it sets is troubling.

While any resident has the right to request an addition to the 20-21 Docket, they are not guaranteed acceptance. There are no compelling and urgent reasons for this rezone request to be "fast-tracked". Doing so ignores the process established by the county to allow thoughtful citizen input and well-planned staff examination. The property owner (and other county property owners who are waiting) will have an equal and fair opportunity to submit requests during the next docket-building cycle.

We urge you to focus on the current 20-21 docket items. Those include "**Community-Driven Review of Agricultural Policies and Practices**". Considering a rezone of any rural resource area is premature without a thorough, citizen-involved discussion of the county's farming future.

Thank you for consideration of these comments.

Robert and Susan Markey

1427 Northwest Lane SE, Lacey WA 98503

From: brztindall@aol.com
To: [Maya Teeple](#)
Subject: rezoning of Beaver Creek Dairy Land
Date: Friday, March 19, 2021 3:09:52 PM

Your support for sustaining the historic dairy farmland, former Beaver Creek dairy and most importantly protecting the salmon run on Beaver Creek is essential. Do not vote for the rezone proposed for the former Beaver Creek dairy in the south part of the county near I-5. The proposal is to build a large warehouse on land that has been farmland and has a salmon-bearing creek, Beaver Creek, flowing through it.

Request the hydrology study of the Beaver Creek dairy authored by Denis Erickson of Department of Ecology for information on this critical issue.

A 35+ year resident of Thurston Co and committed to protecting our heritage and that of our Grandchildren.

In stewardship, Barb and Reed Tindall

From: [Nancy Riordan](#)
To: [Maya Teeple](#)
Subject: Saving Rural Thurston County--Saying NO County Commissioners for re-zoning
Date: Friday, March 19, 2021 3:26:09 PM

For more than 30 years I have lived in Thurston County. I moved to Washington from Idaho State where farm land continues to disappear. Washington and the south sound are my home. It is hard to accept that some people do not understand the importance of conservation. Our county is a treasure and industrial development is putting its' beauty and natural resources at risk.

-

PLEASE DO NOT support the re-zoning of 390 acres of farm lands to industrial west of I-5 near Millersylvania exit. It would permanently change our landscape and alter what is so good and valuable for humanity and other creatures. Beaver Creek warrants protection. Do the right thing for residents now and those in the generations that follow. Make the quality of life here the best buy investing in conservation, saving the land is vital to our future.

Nancy J. Riordan
Olympia, WA 98502
Land Line 360-754-5860

From: [Lorree Gardener Milne](#)
To: [Maya Teeple](#)
Subject: Proposed warehouse development at Exit 95
Date: Friday, March 19, 2021 3:58:23 PM

Gentle persons of Thurston County,

This letter is to any and all decision makers regarding the proposed rezone to make way for development of warehouses on a 390 acre farm parcel, near exit 95, west of I-5.

Please, consider this a strong NO vote from this southwest county resident! What we need more than warehouses, is permeable, green land, especially that which is already suitable for farming. As time passes into the future, we will need more local food production acreage and less truck traffic causing air, water and noise pollution. This would undoubtedly bring light pollution as well.

Exit 99 is already sizing up to be a cluster f***k situation with the mega truck stop being constructed on the west side of I-5, across the freeway from the existing truck stop. We need an unobstructed on/off ramp at exit 95/Maytown, for this reason alone.

This plan would also contribute to the uglification of I-5, which affects tourism and a general pride in what scarce natural beauty is left, and all important green buffer space. This is also a safe place for habitat to migrate from one side of the freeway to the other. Beaver Creek would also be in jeopardy, and given the current challenges to salmon recovery, it should not even be a legal consideration to develop said property for this and all of the reasons mentioned, plus protecting aquifer recharge.

I urge you, please do not change zoning to accommodate commercial profit over livability of Thurston County.

Sincerely,
Your constituent,
Lorree Milne

Sent from my iPad

From: [bdheron](#)
To: [Maya Teeple](#)
Cc: [Betsy](#)
Date: Friday, March 19, 2021 4:12:37 PM

Dear Commissioners,

I respectfully ask you to refuse the re-zone for the Beaver Creek Dairy Farm property. i have retired from the Wa State Dept of Ecology; my work was as a water quality specialist. i am aware that the Beaver Creek Dairy site is an aquifer recharge area. Impervious construction, such as buildings and pavement, restrict the flow of water into the aquifer and consequently into Beaver Creek.

Depriving the creek of a major portion of flow in the summer due to impervious ground cover could cause substantial deterioration of habitat for salmon and wildlife in and around Beaver Creek.

The importance of Beaver Creek for salmon and wildlife, not to mention potential damage to fish and wildlife from even small volumes of spills or flooding, make this rezone contrary to the county's environmental protection goals.

I appreciate your consideration in protecting what we have left of our valuable water and resources.

We are all connected.

Sincerely,

betsy dickes

3030 capitol blvd s

olympia wa 98501

i based my comments on the information in this report:

Erickson D. 2002, Effects of Land Application of Dairy Manure and Wastewater on Groundwater Quality--Pre- and Post-Animal Waste Holding Pond Monitoring. Washington State Department of Ecology Pub No. [02-03-002](#). 123 p.
<https://apps.ecology.wa.gov/publications/documents/0203002.pdf>



A Washington State Chapter of the National Audubon Society
P.O. Box 2524, Olympia, WA 98507
(360) 352-7299 www.blackhills-audubon.org

Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

Dear Thurston County Commissioners Edwards, Mejia, and Menser,

Black Hills Audubon Society (BHAS) asks that you deny the request to change the zoning of the 390-acre Beaver Creek Farm property from Rural Residential (RR) to Rural Resource Industrial (RRI). It should not be added to the Comprehensive Plan Amendment Docket for 20-21. This decision will determine the future character and health of Thurston County's rural farmlands and conservation lands.

BHAS expects that if this rezoning request is added to the docket, studies requiring at least a .50 FTE would most likely lead to its approval, followed by the approval for the construction of an enormous warehouse distribution center. We therefore believe this docket decision is the crux decision point in the entire process. Citizens' efforts to ensure the preservation of rural lands in central Thurston County will just be pro forma after this rezone decision.

One of BHAS's missions is to protect wildlife habitat and their wildlife. We believe the health of Beaver Creek, its riparian corridor, and its surrounding wetlands would be in jeopardy with the industrialization at the Beaver Creek Farm and the neighboring Interstate 5 Exit 95. Beaver Creek is one of five tributaries to the Black River that are monitored under the Shoreline Management Act. Especially imperiled are coho salmon and the federally-listed threatened and state-listed endangered Oregon Spotted Frog. In fact, in 2016 the federal government ruled that Beaver Creek, which borders the rezone area, and its wetlands that are on the rezone area were one of the federal Critical Areas for the Oregon Spotted Frog.

Please see the accompanying report from Mr. Jim Mathieu, of Northwest Land and Water, and hydrogeology consultant for BHAS, for details. His report (1) describes the relevant hydrology of Beaver Creek and (2) technically explains the various negative consequences of establishing two to three million square feet of impervious surface (BHAS's minimum estimate) on the farm property. These negative consequences include: industrial pollution into the aquifer recharge area; pollution into Beaver Creek and its wetlands that would imperil two threatened species, coho salmon and Oregon spotted Frog; flooding and/or water level changes that would threaten the necessary

living conditions for both species; and flooding with industrial pollution downstream, including possible contamination of the wells of nearby private residences.

While most of BHAS's concerns are related to preserving the Beaver Creek water basin and the farmland's aquifer recharge area, we also highly value the wildlife corridor under I-5 at exit 93. The Beaver Creek Farm property is in the heart of rural Thurston County. An "unofficial" wildlife corridor runs west to east from Capitol Forest to JBLM through the best remaining wetlands and rare outwash prairies and their associated wildlife in Thurston County. Exit 95 currently allows animals to avoid crossing the pavement of I-5. We attach a BHAS-produced map entitled *Black River Protected Areas (2017)* that shows County, State, Federal, Native, and Land Trust lands. A protected corridor and a healthy Beaver Creek connect these lands, helping to sustain the prairie and wetland species.

It has been a long-time vision of the Nature Conservancy and the Center of Natural Land Management to preserve this route that connects the thousands of conservation lands along the Black River on the west to the WDFW West Rocky Prairie in the middle and the JBLM prairies in east Thurston County. **We refer you to the Conservation Northwest's excellent comment letter** on the importance of this corridor for Western Washington. It would be tragic to impose an enormous warehouse complex with 24-hour truck traffic noise and lights that would drastically interfere with the movement of all animals from birds to elk.

To summarize, BHAS has identified a number of environmental concerns for both threatened wildlife and people living near the property. BHAS strongly urges the Thurston County Board of Commissioners to deny this rezone request a place on its docket. This farmland and its bordering Beaver Creek are a unique natural resource that should not be turned into an industrial site.

Thank you for considering our comments.

Sincerely,

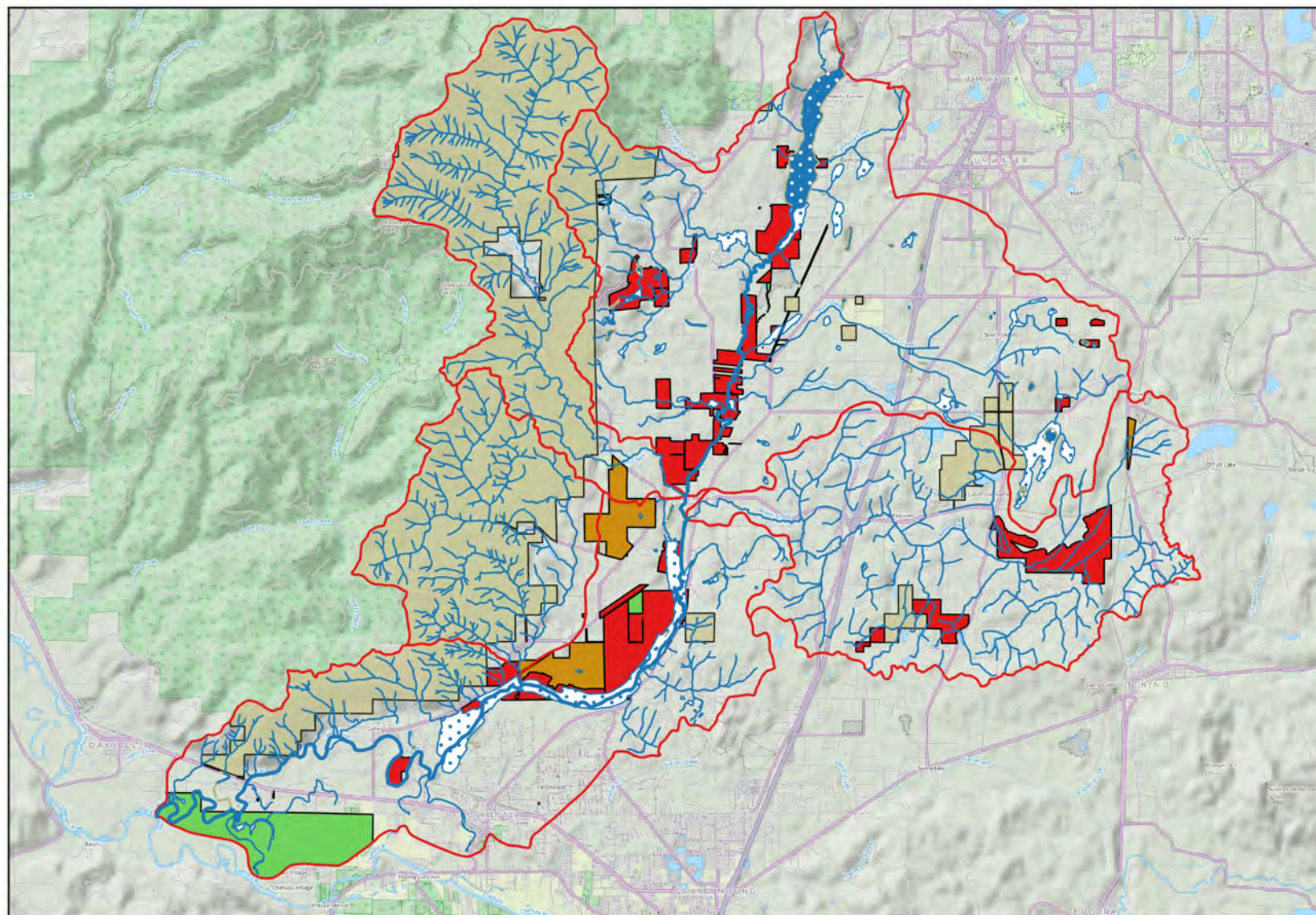
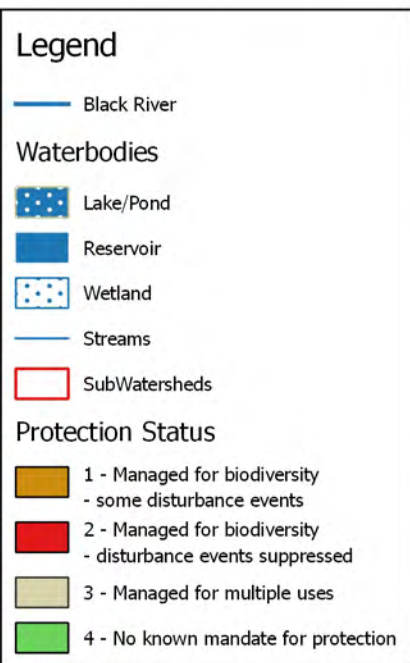


Sam Merrill, BHAS Conservation Committee Chair
Sue Danver, BHAS Conservation Committee Member

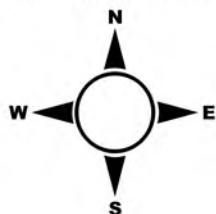
Attachments:

Hydrology report from Mr. Jim Mathieu, Hydrogeologist for Northwest
Land and Water, with accompanying maps
Map of Black River Protected Areas (BHAS 2017)

Black River Protected Areas

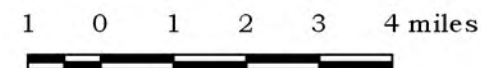


Status	Acres
1 - Managed for biodiversity - some disturbance events	1194
2 - Managed for biodiversity - disturbance events suppressed	5198
3 - Managed for multiple uses	22634
4 - No known mandate for protection	1890



*Source data for Black River Protected Areas is:
U.S. Geological Survey, Gap Analysis Program (GAP). May 2016. Protected Areas Database of the United States (PAD-US), version 1.4 Combined Feature Class. Additional information provided from Capitol Land Trust.

Hydrologic data source is the U.S. Geological Survey National Hydrography Dataset and Watershed Boundary Dataset.



Map by R.Jordan.

March 19, 2021

Black Hills Audubon Society
PO Box 2524
Olympia, WA 98507

Re: Impacts from Rezone of Beaver Creek Farms Property, Exit 95, Interstate 5, Thurston County

Dear Conservation Committee Members,

This memorandum identifies the potential natural resource impacts of the rezoning and future commercial and/or industrial development of an approximately 215-acre¹ property owned by Beaver Creek Farm, LLC. This property, shown on **Figures 1–6**, is known as the proposed Beaver Creek Industrial Park (BCIP). Much of the BCIP, which was formerly operated as pasture for dairy cows, has been fallow for a number of years. It is part of a 390-acre proposed rezone area (PRA) shown on **Figure 7**. At the request of the applicant developer, HW Seattle LLC, Thurston County is considering placing the PRA on its docket to study the consequences of converting this predominantly fallow agricultural land to commercial/industrial use.

As described below, the proposed rezone and BCIP development is incompatible with the high-value hydrological and ecological natural assets on, adjacent to, and downstream of Beaver Creek Farm. This development would significantly increase stormwater runoff, threaten the quality of a sole-source drinking water aquifer, harm habitat for salmon and frogs, and increase the potential for flooding at downstream properties. It is also antithetical to the millions of dollars that have been invested to protect and restore aquatic habitat along Beaver Creek by local, county, state, and federal agencies and organizations.

CURRENT CONDITIONS

Local Water Resources

Beaver Creek, a tributary of the Black River, is part of the Chehalis River basin. Regionally, it flows from east to west (blue arrows); however, locally, it meanders adjacent to the southeast, south, and west boundary of the BCIP before turning westward for approximately two miles, where it joins the Black River near the town of Littlerock (**Figure 1**). The creek's headwaters originate east of Maytown near West Rocky Prairie. Several tributaries, including Allen Creek,

¹ The site plan shows a 215-acre development—proposed Beaver Creek Industrial Park (BCIP)—received 11/12/20 by Thurston County Building Development Center, by Hatton Godat Pantier, prepared for HW Seattle, LLC.

flow into Beaver Creek. Rainfall and creek flow feed local wetlands that form along channel banks.

Groundwater occurs locally in a shallow aquifer that consists of glacial outwash sediments. Where groundwater occurs at, or near, ground surface, it feeds local wetlands. These wetlands provide valuable “eco-services” such as storing flood water and maintaining the natural water quality. Groundwater also feeds, or is recharged from, creeks seasonally. Like creek flow, groundwater moves from east to west in the BCIP area regionally, as depicted on **Figure 1** by the green arrows.

The locations of water supply wells are shown in **Figure 2**. These wells are the sole source of drinking water for over 200 homeowners that live and work in the Beaver Creek drainage downstream / downgradient of the BCIP.

Critical Habitat Designation

The Beaver Creek system has been designated as critical habitat for the Oregon spotted frog (OSF), which was federally listed as *Threatened* in 2014 under the Endangered Species Act. Much of the OSF’s habitat has been destroyed by development in the Pacific Northwest; one of the key habitat areas that remain lies within the Beaver Creek subbasin and adjacent areas in the Black River watershed.

Wetland areas, a key component of this habitat, are shown on **Figure 3**. The OSF uses much of the wetland habitat on, upstream, and downstream of the BCIP (**Figure 4**). This frog species requires year-round, high-quality water for all its life stages.

Investments in Habitat

Stakeholders have invested significant funds into maintaining and improving salmonid habitat in the Beaver Creek area. **Figure 5** shows the mapping that has been conducted for salmonid species habitat in the area. Since 2017, over \$1.2M has been invested to design, remove, and construct improvements for fish passage and habitat along the creek by Thurston County, the Washington Department of Fish and Wildlife (WDFW), and the U.S. Fish and Wildlife Service. These organizations have funded and/or deployed field crews for the projects shown below.

Year	Cost	Who	Description
2020	\$900,000	Thurston County	Replacement of a culvert to provide fish passage on a tributary to Beaver Creek on Case Road, just upstream of the BCIP
2017	\$160,000	Thurston County	Replacement of a failing culvert with a bridge to provide fish passage on Beaver Creek under Beaver Creek Road (won a national award)
2020	\$150,000	WDFW	Removal of a culvert and restoration of fish passage on Beaver Creek on the east side of West Rocky Prairie

In addition, in the mid-1990s, a Special Congressional Appropriations Committee funded trust resources for the Chehalis Tribe. For 25 years, the Tribe has received monies for rural landscapes and funded dozens of riparian restoration projects in the Chehalis and Black River corridors.

DEVELOPMENT IMPACTS

Development impacts fall under three main categories: disruption to the natural hydrologic cycle, impairment or destruction of habitat, and degradation of creek and groundwater quality, as discussed below.

Disruption of the natural hydrologic cycle

The proposed development will disrupt the natural hydrologic cycle—specifically, it will change the amount and timing of water that feeds Beaver Creek and its wetlands. This disruption will, in large part, be caused by stormwater that will be generated when the BCIP is covered with impervious surfaces—about 220 million gallons annually, assuming a coverage of 200 acres and 40 inches of annual rainfall (a conservatively low estimate). The likely zone of these flow regime changes is shown in **Figure 6**. This figure shows not only the area of potential habitat impacts, both in downstream creeks and wetlands, but also the area of impacted water wells.

Because of the small size of the Beaver Creek system, the cumulative impacts of impervious surfaces are potentially serious and include flooding, which would be detrimental not only to downstream property owners but also to fish (especially coho salmon) and the OSF. For coho, flooding can change the stream characteristics and scour spawning gravels; it also has the potential to flush out juvenile fish, which must remain in fresh water streams and rivers for 1–2 years. Flooding also has the potential to damage properties downstream from the BCIP to Littlerock.

Consequently, the stormwater generated by the BCIP would need to be managed in perpetuity. Such management would be extraordinarily / prohibitively expensive and, in fact, may not even be achievable, given the quantity, seasonal rates, and locations of discharge. Our experience with

other large commercial/industrial projects along the I-5 corridor in the Thurston County / City of Tumwater jurisdiction indicates that developers fail to adequately demonstrate their commitment to protecting the quantity and quality of water resources in these areas (NLW, 2021, Attachment 1).

Impairment or destruction of habitat

Habitat for salmonid species and the OSF would likely be impaired or destroyed by the long-term, chronic discharge of poor-quality stormwater runoff from roadways, parking lots, and other impervious surfaces. Untreated stormwater presents risks because it contains petroleum compounds, landscape pesticides/herbicides, and micro-particles from tire abrasion. Runoff from roads with heavy traffic is a source of 6PPD-quinone, a contaminant related to tire decay that has been linked to acute mortality rates in coho salmon. This contaminated runoff will impact both the creek and groundwater, both locally and downgradient (**Figure 6**).

Another risk is catastrophic contamination from spills or leaks from on-site fuel or chemical storage tanks, vehicle collisions due to higher density traffic, and the use of foaming agents to suppress commercial or industrial fires.

Degradation of groundwater quality

Groundwater quality may also be impacted by long-term and/or catastrophic sources, leaving downgradient well users with no other source of water (**Figures 6 and 7**). Any contamination of wells in this area would place a huge financial burden on Thurston County, which would be obligated to compel the industrial property owner to clean up the contamination and provide an alternative water source to rural residents. In certain cases, the alternative source would have to be provided in perpetuity because some contaminants are difficult to clean up once they reach an aquifer. Some rural residents have hobby farms or engage in activities that require their full, permit-exempt allocation from their water wells; disruption of their water supply could up-end their way of life.

SUMMARY

The Beaver Creek Farm property is part of a high-functioning ecosystem that largely depends on the local hydrology. Developing this property threatens this functioning, which supports not only critical habitat for listed species but also local drinking water supplies for nearby communities. Thus, Thurston County commissioners face a profound decision that will affect the landscape, water resources, people, plants, animals, and habitat in this area, in perpetuity.

As stewards of the county's water resources, the commissioners are responsible for protecting and preserving rural residents' way of life, along with the ecological functions that support healthy habitat for fish, wildlife, and recreation. Rather than allowing polluting activities upstream of a critical reach of Beaver Creek and upgradient of a sole source of drinking water,

the commissioners would better serve the local community (from I-5 to Littlerock) by designating this small subbasin as a critical stream-aquifer protection area. Furthermore, protecting the water resources and allowing high-quality recharge to wetlands, creeks, and aquifers are in accordance with requirements of Washington's *Groundwater Management Act*.

LIST OF FIGURES

Figure 1: Flow System
Figure 2: Water Wells
Figure 3: Wetlands
Figure 4: Frog Habitat
Figure 5: Salmonid Habitat
Figure 6: Development Impacts
Figure 7: Development Impacts (PRA)

If you have any questions, feel free to contact me.

Sincerely,

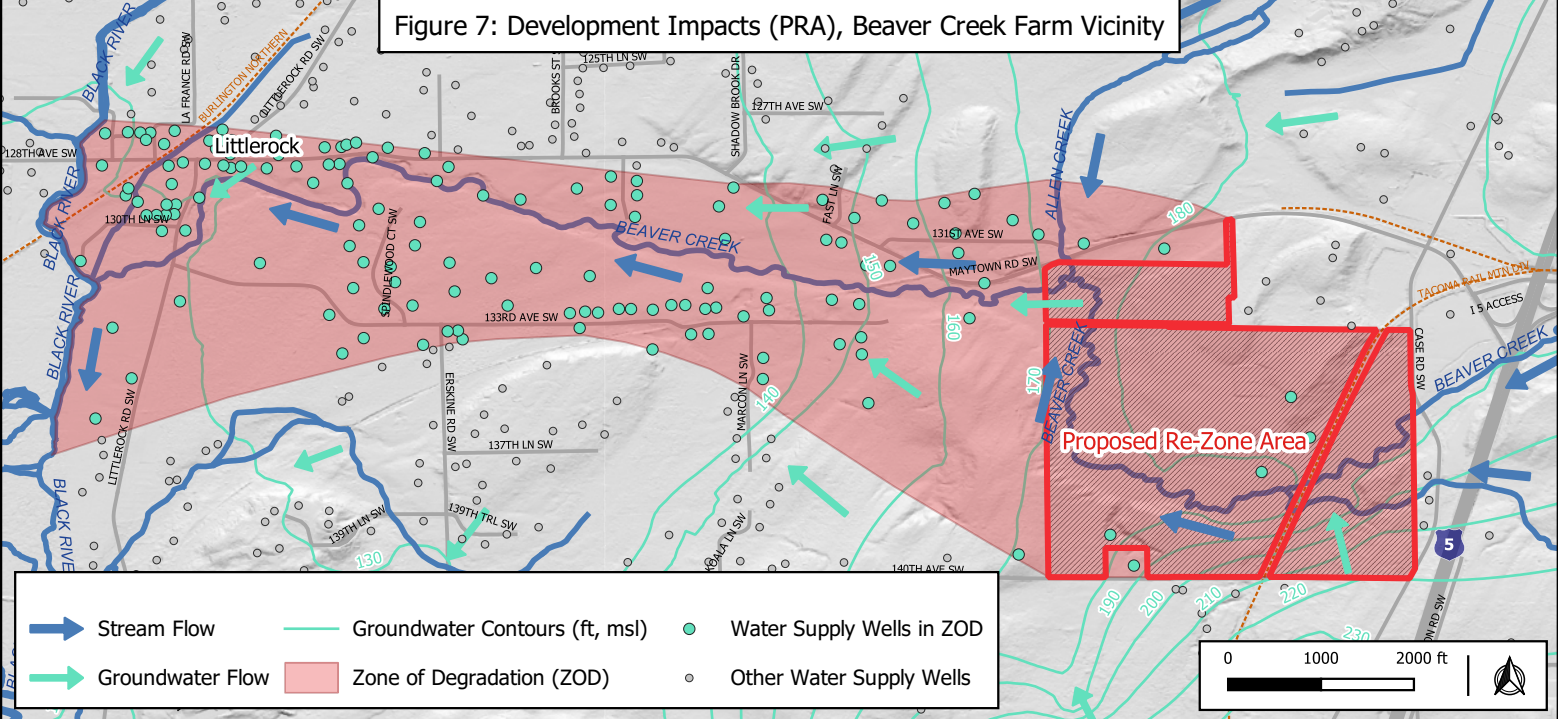
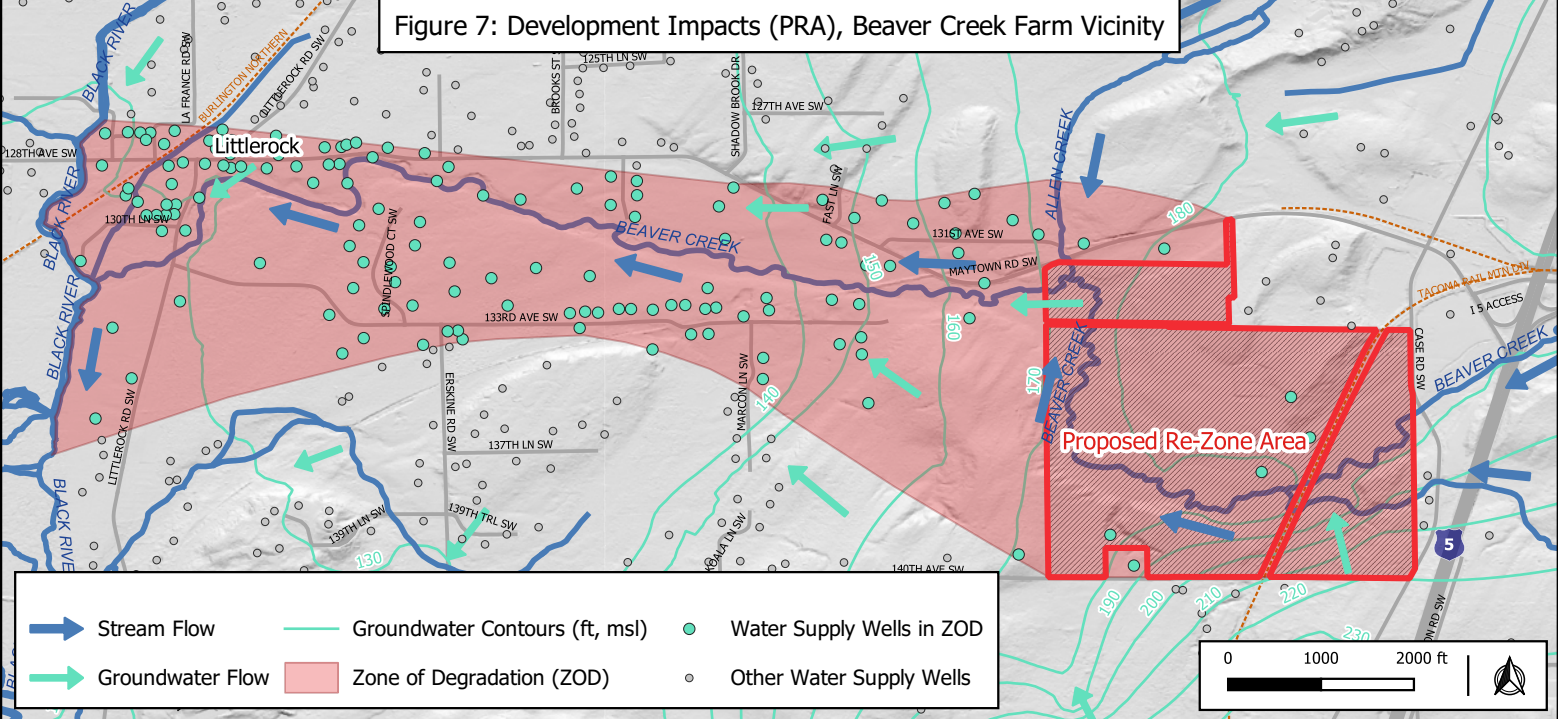


James T. Mathieu

James T. Mathieu², LG, LHg
President, Principal Hydrogeologist

² A resume for James T. Mathieu is included at the end of this PDF report (Attachment 2).

Figure 7: Development Impacts (PRA), Beaver Creek Farm Vicinity



February 1, 2021

Chris Carlson, Planner
City of Tumwater
555 Israel Road
Tumwater, WA 98501

Re: Public Comments for Appeal of SEPA TUM-18-0420, Puget Western Warehouse
Distribution Center

Dear Chris,

As per the public announcement and the City's subsequent decision on public comments regarding the SEPA appeal for Puget Western's proposed Tumwater East I-5 Warehouse Distribution Center, I am submitting the following comments on behalf of the Black Hills Audubon Society (BHAS). I trust you will make these comments available to the City of Tumwater Hearing Examiner for their timely review.

As you are aware, for over a year, BHAS and I have been tracking and commenting on the fate of stormwater from the proposed warehouse. We believe that the work conducted to date in support of this project is insufficient for protecting the local community's water resources, for the reasons outlined below.

Inadequate demonstration of compliance with water-level rise requirements

The model parameters used in Puget Western's groundwater analysis strongly biases a mounding result to show compliance with the City's requirement for water-level rise, as discussed in Exhibits C-15¹ and C-29² and the attached email dated May 11, 2020³. We attribute these deficiencies to the use of a poorly calibrated model that underestimates the observed seasonal water-level rise and overestimates the lag time in water level response at key locations.

Furthermore, the model may show an unrealistic infiltration feasibility by estimating a higher capacity than what is actually achievable under post-development conditions.

¹ NLW's pre-decision comments for SEPA, TUM-19-1412, East I-5 Distribution Center—review of Terra Associates, Inc., report, dated March 17, 2020.

² NLW's comments on SEPA, TUM-18-0420, Puget Western Warehouse Distribution Center, dated October 6, 2020.

³ This email was submitted to the City but not included as a staff report Exhibit.

We believe the groundwater analysis does not meet the professional hydrogeology standard of care that applies at this location, at this time, for a project of this scope, which significantly modifies the hydrology of this approximately 65-acre property.

We are not alone in this assertion. Please see Thurston County hydrogeologist Kevin Hansen's review of the Puget Western's groundwater analysis (Exhibit C-17⁴).

Lack of a stormwater fate analysis and monitoring plan

Puget Western's pre-design work lacks a stormwater fate analysis that examines impacts to drinking water wells located within the community surrounding, and downgradient of, the proposed warehouse facility. No maps or hydrogeologic cross sections have been presented to show how this stormwater⁵ is expected to move from the site via infiltration galleries into the underlying and downgradient aquifer. Such an analysis is critical to identifying drinking water supply wells that may be impacted by contaminants in stormwater and developing a monitoring program that provides sufficient warning to protect these resources.

The goal of monitoring should be to track the quality of water as it moves from on-site stormwater detention, through treatment, to the underlying aquifer that supplies local residents' drinking water wells. No such monitoring system has been proposed.

Lack of evaluation of impacts to downstream wetlands and creeks

Likewise, the downstream impacts of infiltrated stormwater from the warehouse site have not been evaluated for local wetlands, Salmon Creek, and its tributaries. The Salmon Creek basin has a well-documented history of high groundwater and flooding. These features should be monitored for water quality, both pre- and post-development.

Lack of O&M plan and long-term funding source

Puget Western has not clearly developed an operation and maintenance (O&M) plan or a funding source for treating stormwater prior to infiltration. Funding must be demonstrated as viable, in perpetuity, to protect the source of drinking water for nearby residents and commercial businesses.

...

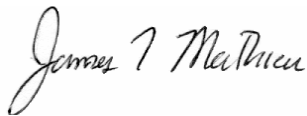
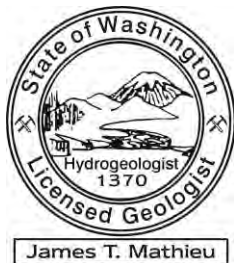
⁴ Review of Puget Western (east) Documents, letter report to Michael Matlock, City of Tumwater Community Development Director, from Kevin Hansen, Thurston County Hydrogeologist; cc Mayor Pete Kmet and Chris Carlson, City of Tumwater, cc Commissioner Tye Menser, Thurston County; dated July 8, 2020.

⁵ Substantial "new" poor quality stormwater will be generated from the destruction of trees and other vegetation followed by construction of 45 acres of impervious surfaces and activity on these surfaces.

We encourage the hearing examiner to require Puget Western to perform analyses and prepare designs and plans that address our concerns. There is much at stake for surrounding communities and the environment. The costs of safeguarding high-quality surface water and groundwater, preserving eco-functions, and preventing flooding will be far less than the costs of remedying damage to these resources in the future. They should be protected for generations to come. In addition, it is important that this project set a credible, transparent precedent for analysis and design. Such a precedent is needed to ensure that future development projects along the I-5 corridor are held to standards that protect the integrity of water resources in the vulnerable Salmon Creek sub-basin.

If you have questions or would like to discuss the contents of this letter, feel free to contact me.

Sincerely,



**James T. Mathieu, LG, LHg
President, Principal Hydrogeologist
Northwest Land & Water, Inc.**

Attachment:

Email from Jim Mathieu, Northwest Land & Water, to Chris Carlson, City of Tumwater, dated May 11, 2020.

Sent via email:

Sam Merrill, Conservation Chair, Black Hills Audubon Society

Jim

From: Jim
Sent: Monday, May 11, 2020 8:23 AM
To: CCarlson@ci.tumwater.wa.us
Cc: Sam Merrill (sammerrill3@comcast.net)
Subject: I-5 Distribution Center at 93rd Av SW -- 2nd review by NLW
Attachments: Tumwater East I-5 Distribution Center - Response to NW Land and Water Inc. Comments_nlw-comments-v2.pdf; Fig 1 Poor Match of Groundwater Levels at Three Target Wells.pdf

Hi Chris,

I reviewed the responses dated March 26, 2020 from Terra Associates, Inc (Terra) to my comments on:

- *Hydrogeologic Study and Stormwater Mounding Analysis (Project No. T-6304-1), Tumwater East I-5 Distribution Center, Kimmie Street SW and 93rd Avenue SW, Tumwater, Washington, 3rd Revision August 8, 2019*

Attached is a PDF that contains my comments responding to Terra's March 26, 2020 comment letter. In summary, **Terra does not adequately respond to most of my questions or my requests for more information.**

The key issue, as stated in my March 17, 2020 letter report, is that Terra's transient model calibration was poor. This is a concern because Terra's current calibrated transient model was then used to demonstrate post-development compliance, i.e. not more than 0.5 feet of water level rise at the property boundary. To see the poor match graphically, I have attached PDF **Figure 1** to this email. Furthermore, **Table 1** below summarizes the calibration results showing substantial differences between observed and calculated (modeled) data.

Table 1 Summary of Calibration Results			
Well ID	Seasonal Water Level Rise (feet)	Difference = Calculated - Observed (feet)	Peak Water Level Offset (days)
B-2/A (Observed)	15.3	-2.3	54.5
B-2/A (Calculated)	13.0		
B-3/A (Observed)	20.4	-7.5	55.6
B-3/A (Calculated)	12.9		
GE-MW-1/A (Observed)	11.6	0.9	58.5
GE-MW-1/A (Calculated)	12.5		
Note: See Figure 1a,b,c for measurements			

The model underestimates the observed seasonal water level rise at Wells B-2/A and B-3/A by 2.3 and 7.5 feet, respectively, and overestimates the observed seasonal rise at Well GE-MW-1/A by 0.9 feet. Additionally, the modeled peak water level occurs 54.5 to 58.5 days later in the season compared to the observed peak. Therefore, my concern is: **how accurate are the post-development model calculated water level rise used to demonstrate the compliance criterion of 0.5 feet or less?**

Furthermore, a calibrated model—that has a good match between observed and calculated water level elevations—should also be used to demonstrate the infiltration gallery capacity as part of conceptual or preliminary engineering design work. During a year of high intensity precipitation and associated high water levels, infiltration gallery capacity may be reduced. This would then require managing excess stormwater via infrastructure other than the galleries. Questions about excess stormwater that are relevant include: how frequent, how much, and where to convey (storage onsite and/or discharge offsite)?

A critical relationship in examining infiltration gallery capacity during high-intensity storm events is the infiltration gallery vertical position relative to peak water levels. **Table 2** below shows the water level elevation comparison between observed and calculated seasonal peak water level elevation for the current calibrated model. Data shown in **Table 2** and on **Figure 1** indicate the calculated (model) water level elevations are 1.3 to 3.3 feet lower than observed water levels—a result that potentially biases an infiltration gallery capacity analysis by showing higher capacity than may actually occur for post-development conditions.

Table 2 Water Level Elevation Comparison		
Well ID	Seasonal Peak Water Level Elevation (feet above datum)	Difference = Calculated - Observed (feet)
B-2/A (Observed)	190.9	-3.3
B-2/A (Calculated)	187.6	
B-3/A (Observed)	191.8	-3.2
B-3/A (Calculated)	188.6	
GE-MW-1/A (Observed)	190.7	-1.3
GE-MW-1/A (Calculated)	189.4	
Note: See Figure 1a,b,c for measurements		

Please call or email if you have questions.

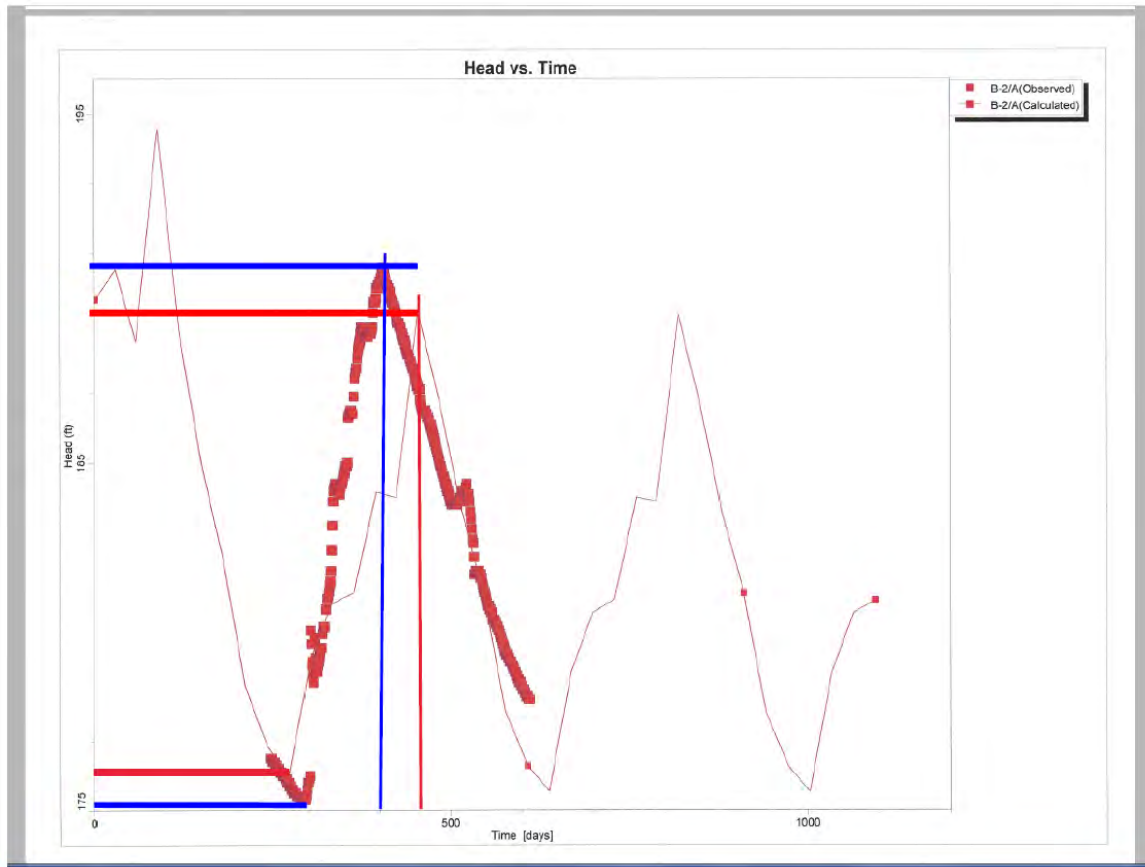
Jim

p.s. I have cc'd Sam Merrill, Conservation Chair, Black Hills Audubon Society, on this email

 Jim Mathieu, LG, LHg (WA); RG (OR)
 Principal Hydrogeologist
 Northwest Land & Water, Inc
 206-525-0049 office
www.nlwinc.com

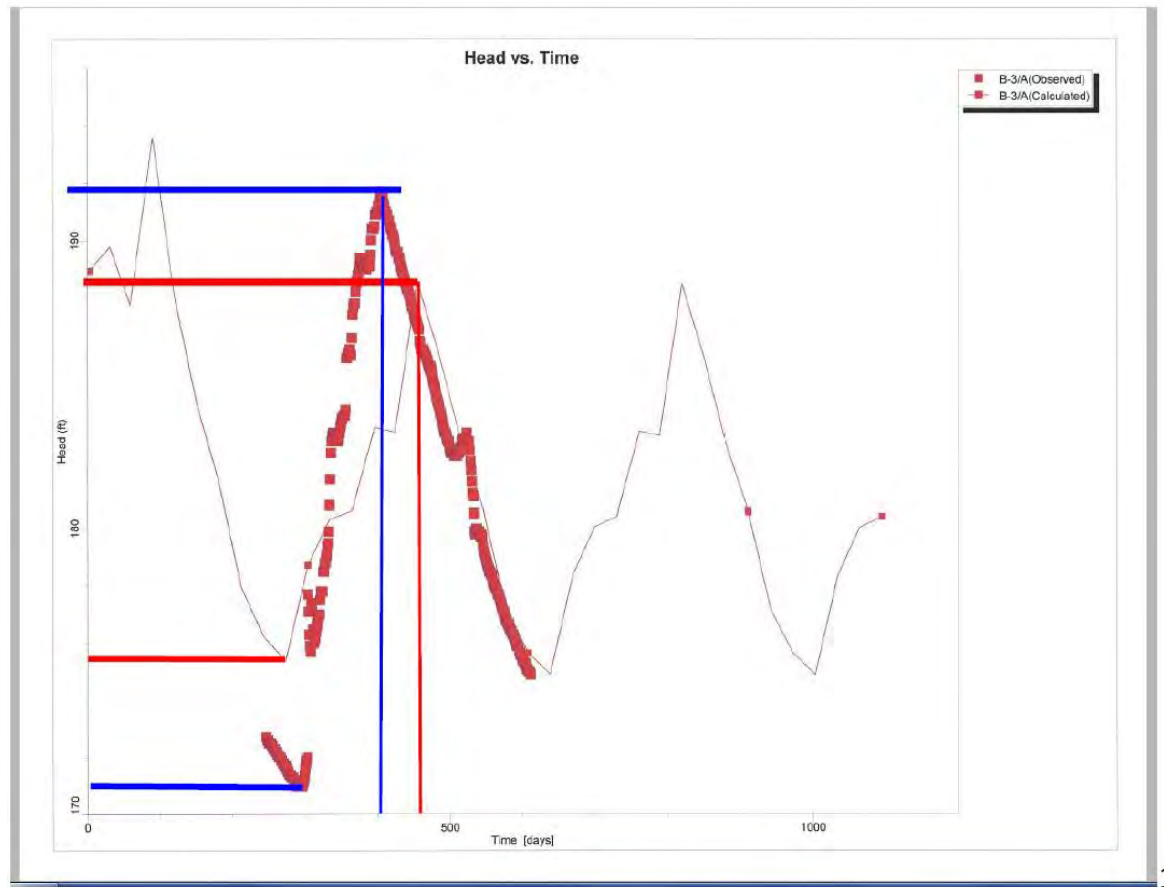
Figure 1. Poor Match of Groundwater Levels for Transient Calibration at Three Target Wells¹

1a

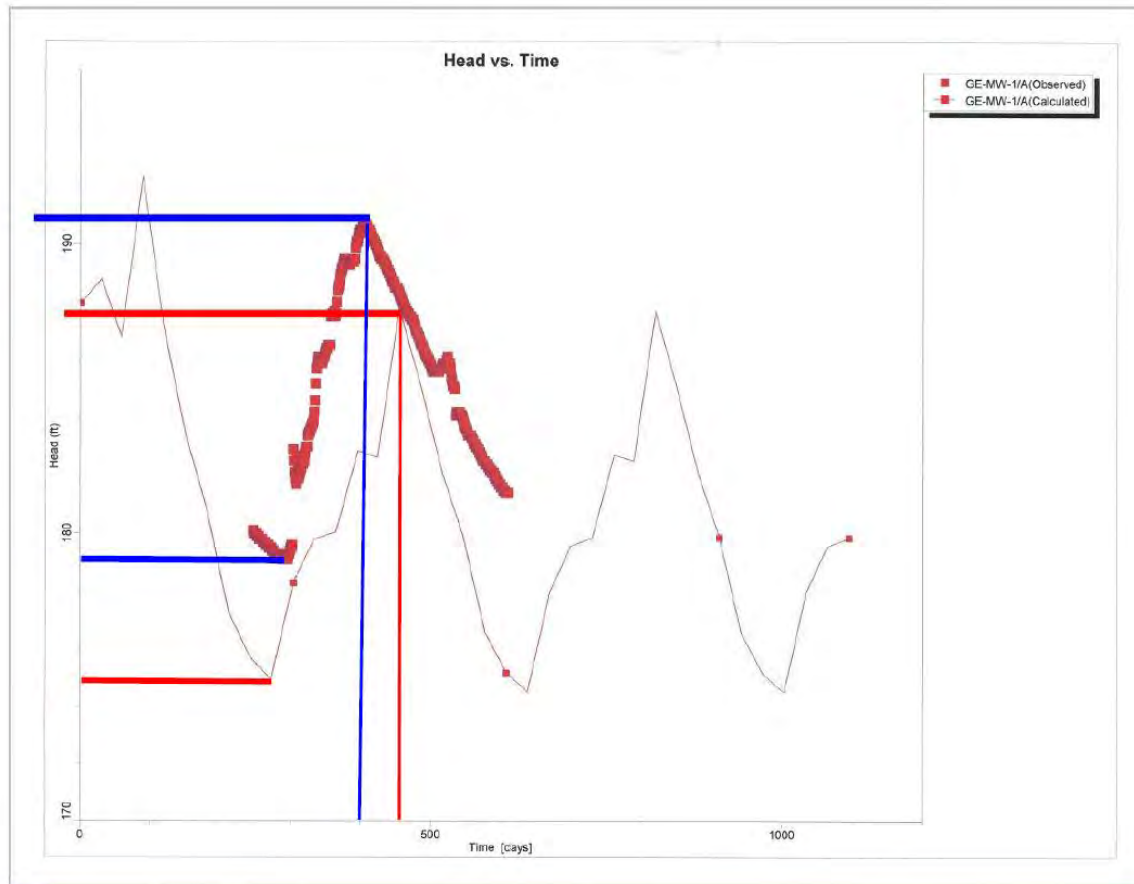


¹ Annotated graphs 1a, 1b, and 1c from pages 54, 55, and 56, respectively, *Hydrogeologic Study and Stormwater Mounding Analysis (Project No. T-6304-1)*, Tumwater East I-5 Distribution Center, Kimmie Street SW and 93rd Avenue SW, Tumwater, Washington, 3rd Revision August 8, 2019

1b



1c



James T. Mathieu, LG, LHg • Northwest Land & Water, Inc.



Jim Mathieu has 30 years of experience in water resource planning and management and technical study design. Much of his work has supported regional watershed plans and municipal water comprehensive plans, which have required the development of water budgets that consider population growth and climate variability as well as

novel approaches to data collection and analysis.

Education: M.S. Hydrology, 1989 University of Arizona; B.A. Geology, 1984, University of California, Santa Barbara

Professional Registration: Licensed Geologist / Licensed Hydrogeologist, Washington

Major Areas of Expertise

- Basin-scale hydrogeologic characterizations
- Groundwater – surface water interactions
- Watershed and water rights investigations
- Hydrogeologic site assessments
- Groundwater flow modeling and recharge analysis
- Wellhead protection area delineation
- Monitoring system design and implementation
- Water supply development
- Water well and well field design
- Aquifer testing and analysis
- Manage aquifer recharge (MAR)
- Aquifer storage and recovery (ASR)
- Artificial recharge and recovery (ARR)
- Hydrologic impact analysis

Representative Project Experience

On-farm ASR/ARR Investigation

Walla Walla Basin Watershed Council, Eastside Milton-Freewater Area, OR

Conducted a planning-level study to examine legal, technical, and cost considerations for on-farm basalt ASR and/or alluvial aquifer ARR. Investigated ASR / ARR suitability for diverting winter / early spring Walla Walla River water, storing it, and withdrawing it via pumping from spring through summer to leave water instream (as much as 10 cfs of water rights) for

ecological benefit, including improved salmon and steelhead habitat.

Monitoring Well Siting, Construction, & Instrumentation, Walla Walla Area MAR Basins & Infiltration Galleries

Walla Walla Basin Watershed Council, OR/WA

Collaborated with WWBWC staff to site and instrument monitoring wells near existing or new recharge infrastructure. Assessed the benefit of recharge on tributary creek flows and designed, constructed, and tested a monitoring well network to characterize shallow alluvial aquifer conditions for receiving diverted river during high spring runoff periods.

Intrinsic Tracing of Recharge Water in the Eastside Alluvial Aquifer Adjacent to the Walla Walla River

Walla Walla Basin Watershed Council, Eastside of Milton-Freewater Area, OR

Engaged in tracing recharged river water using conductivity, temperature, and stable isotope data to assess feasible locations for recovery.

Watershed Plan & Technical Support

WRIA 14 Planning Unit, Kennedy-Goldsborough Watershed, WA

Characterized sub-watersheds with the goal of understanding the impacts of future withdrawals from exempt and municipal wells on Johns Creek, which contains salmon habitat and is of high value to the local tribe and other community members.

WRIA 14 Johns Creek Sub-basin Build-out

WRIA 14 Planning Unit, Kennedy-Goldsborough Watershed, WA

Estimated current and future consumptive water use and evaluated possible impacts to creek flow. Developed recommendations to assist planners in decisions about land and water.

WRIA 14 Hydrogeologic Characterization

WRIA 14 Planning Unit, Kennedy-Goldsborough Watershed, WA

Conducted hydrogeologic characterization and field studies for a 60-square-mile study area using Viewlog and other GIS-based approaches. Developed a groundwater monitoring network to collect water level data. Synthesized data and reported findings and recommendations for resource planners and managers.

Water Rights / Stream Restoration

Washington Water Trust, WA

Developed an extensive set of GIS maps and linked tables to display natural resource features and water

James T. Mathieu, LG, LHg • Northwest Land & Water, Inc.

rights. Information was used to assess areas where water rights could be purchased and transferred into a trust program, thereby enhancing stream flows.

Zylstra Lake Water Supply & Water Rights

Washington Water Trust / San Juan Preservation Trust, San Juan Island, WA

Developed key water budget components and assessed water rights within this watershed. Examined the impacts of drought on Zylstra Lake levels and its shoreline position.

Parcel-scale Land & Water Development

Private Landowner, WRIA 7, WA

Following the Hirst decision, but prior to SB 6091 (now RCW 90.94), assisted a private property owner with a range of options to develop water. These options included connecting to a nearby Group B water system, installing a roof-rainwater catchment system, purchasing and transferring a local water right, and hauling water. Other novel approaches were discussed that included creative stormwater management to recharge water and offset groundwater use.

WRIA 9 Strategic Assessment

Sub-Consultant for King County, WRIA 9, WA

Completed portions of a strategic assessment of the groundwater interaction with the Middle Green River. Compiled data from numerous sources and performed qualitative and GIS-based analyses to identify reaches with significant groundwater discharge to the stream and to assess the hydraulic connection between large wells and the Green River.

Long-Term Hydrologic Monitoring & Land Development Review to Protect ESA-listed Frog

Black Hills Audubon Society, in collaboration with the Washington Department of Fish & Wildlife, Thurston County, WA

Implemented a water monitoring program for state land at West Rocky Prairie (WRP) to evaluate aquatic habitat for the Oregon spotted frog. The WRP management unit is located adjacent to a gravel mine that has the potential to impact hydrologic conditions and adversely impact active OSF restoration work by WDFW. Also, reviewed other future land use conditions to assess potential habitat impacts at another OSF site in Thurston County. Provided written opinions and testimony regarding habitat protection.

Meridian Valley Creek Hydrogeologic Characterization

City of Kent, WRIA 9, WA

Characterized soil and shallow groundwater conditions using lithologic and hydraulic data from new wells and boreholes. Measured soil permeability, estimated creek flow gains and losses, and recommended creek realignment design features.

Hydrogeologic Characterization

City of Auburn, WRIs 9 and 10, WA

Compiled data to develop a comprehensive groundwater flow model and used the model to evaluate groundwater withdrawal impacts on streamflow and to define capture zones for wells. Developed long-term groundwater supply and mitigation scenarios.

MODFLOW Model to Quantify Impacts & Develop a Mitigation Strategy

City of Auburn, WRIs 9 and 10, WA

After a decade of hydrogeologic characterization, constructed and ran a multi-layer, regional-scale, transient numerical model to simulate new groundwater withdrawal scenarios. Quantified impacts for two major rivers and one creek and developed a palette of mitigation options to offset river/creek impacts.

Blue Slough Habitat Restoration & Reconnection

Private Landowner, WA

Developed cross sections and monitored water levels in a former side channel of the North Fork Stillaguamish River to support the procurement of State funds for phase I restoration activities.

Technical Support

Spokane County Water Availability Advisory Group, Spokane County, WA

Provided hydrogeologic technical support to the facilitator, advisory group, and County during stakeholder meetings. Interpreted pumping data on file with the County and improved data collection standards.

Hydrogeology, Land Use, & Water Supply Study

Spokane Conservation District, Hangman Creek Watershed (WRIA 56), WA

Characterized hydrogeologic conditions using existing well log data, data from the construction and testing of new monitoring wells, and isotope and geochemical sampling and analyses. Improved the understanding of the hydraulic connectivity between the crystalline basement, Columbia River Basalts (CRB), and glaciofluvial aquifers, as well as the connectivity of aquifers to local creeks.

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Geochemical & Hydrogeologic Characterization

Spokane County & Spokane Conservation District, West Plains & Hangman Creek (WRIA 54 & 56) Watersheds, WA

Extended the WRIA 56 characterization into areas of the West Plains and adjacent Hangman Creek watershed where population growth is expected. Results showed both hydraulically distinct and interconnected water-bearing zones within the CRB, with some interconnected zones possibly as a result of commingling wells, and other CRB aquifers that may be hydraulically bounded, resulting in long-term “groundwater mining.”

Hydrogeologic Study

Spokane Conservation District, Hangman Creek Watershed (WRIA 56), WA

Planned, contracted, and directed drilling and construction of six monitoring wells in CRB Group aquifers to characterize the hydrostratigraphy, aquifer parameters, geochemistry, and groundwater level trends in a region with a substantial number of commingling wells. Careful attention was given to the proper sealing of shallow aquifers from intermediate and deep aquifers. Identified a deep unconfined aquifer with artificial recharge (AR) or ASR potential.

Wellhead Protection Studies

Cities of Lacey, Olympia, Tumwater, Fife & Auburn, WRIAs 9, 10, 11, 13, and 23, WA

Designed and installed monitoring wells to collect data and establish wellhead protection programs. Analyzed test data to evaluate aquifer parameters and water quality conditions. Conducted modeling to delineate time-of-travel capture zones for supply wells. Developed and wrote plans integrating zoning, land use, and critical aquifer recharge areas. Also, designed ongoing monitoring programs, characterized the local hydrogeology, and managed field operations.

Potable Water Exploration

City of Lacey, Hawks Prairie Area, WA

Managed a multi-year drilling and characterization project to investigate a deep groundwater supply source. Work included drilling test wells and a large-diameter production well, logging drill cuttings, designing and testing the well, and geochemical sampling. Developed monitoring recommendations for sustainable groundwater development.

Test Well Construction

City of Buckley, WA

Logged, designed, and tested a 6-inch well to assess the potential for municipal water supplies. Evaluated aquifer parameters and potential yield and made

recommendations for further testing, development, and monitoring.

Beachcrest Wells 1 & 2 Rehabilitation

City of Lacey, Beachcrest Area, WA

Managed the rehabilitation of two production wells. This work involved testing, followed by downhole mechanical rehabilitation methods (including Hydropuls®) and post-rehab testing. The rehab work increased the total site yield.

Software Capabilities

- ArcGIS
- MODFLOW
- MODSURFACT
- MODPATH
- AQTESOLV
- Groundwater Vistas
- AutoCAD
- ViewLog

Tools & Equipment Capabilities

- **Pressure transducers and dataloggers:** GEOKON®, Solinst®, INW™
- **Flow measurement:** Ultrasonic, non-invasive paddle wheel (analog and digital); orifice plate / manometer
- **Drilling and well development:** Cable tool, rotary, sonic, Hydropuls®, surge block, airlift-isolator, high resolution down-hole camera

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

Uniq ue ID	Date	Commenter Name	Proposal Name(s)	Type of Comment	Summary
15	1/30/2022	Loretta Seppanen	CPA-16 - Community Driven Review of Agricultural Policies and Programs; CPA-1 - Joint Plan Updates; CPA-6 - Nisqually Subarea Plan Update CPA-7a - Grand Mound Subarea Plan Update; Countywide Study of Industrial Lands; CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment; CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment; Black Lake Quarry Site Specific Land Use and Rezoning Amendment; Bar Holdings LLC Site Specific Land Use and Rezoning Amendment; Scott Land Use and Rezoning Amendment; A-8 - Habitat Conservation Plan Implementation Ordinance; A-26 - Transfer & Purchase of Development Rights; A-25 - Forest Lands Conversion and Rural Tree Protection Standards; Review SEPA Comment Period Timelines		<p>I support docket items that support agriculture in Thurston County. I ask that you:</p> <ul style="list-style-type: none">- place a high priority on CPA-16 Community Driven Review of Ag.- place a high priority on the County Wide Study of Industrial Lands- include discussion of agricultural lands in the CPA-6 Nisqually Subarea Plan - 1/3 of the work should focus on agriculture since 1/3 of the land in the subarea is ag zoned.- Include discussion of nearby agricultural lands in CPA-7a, the Grand Mound Subarea Plan- Encourage protection of remaining agriculutral land in the UGAs as CPA-1 Joint Plans for Lacey and Olympia are updated- Place high priority on A-8 HCP Implementation and moderate priority on A-26 TDR/PDR and A-25 Forest Lands Conversion- Place a high priority on the review SEPA Comment Timelines - 14 days is not enough <p>I support an effort to comprehensively address industrial uses in Thurston County</p> <ul style="list-style-type: none">- Delay until the next docket cycle the following industrial related proposals: CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry, and Bar Holdings. An Industrial Lands Analysis should be complete first.- Delay Scott Land Use/Rezoning Amendment as it is on woodland and near farms that have been farmed in years past.- Place a high priority on the Countywide Study of Industrial Lands.
19	1/31/2022	Chris Doelman	CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment	Support	<p>Due to current conditions in Washington State, we are no longer dairy farming on the property. We have sold all of our milk cows. With the cows sold we are looking to act quickly on the transition of the property's use. It is currently zoned RRR 1/5 and would make a nice site for mid to high-income homes, but this might not best serve the community. We believe the property's best use is Industrial (RRI) with its proximity to the interstate, rail, Port of Tacoma, land size and capacity to create jobs.</p> <p>The intent of this letter is to express to you the urgency. The dairy is gone, my father is 84, and the demand for logistic/distribution centers and housing is high. Our family needs to make decisions for our future.</p>
20	1/31/2022	Mark Detmir	CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment	Support	<p>Industrial lands create jobs, bring in additional tax revenue, enhance school districts and other public services, and improve the overall community space. It creates jobs almost immediately with need for architects, appraisers, surveyors, contractors, and also creates long-term jobs. It positively impacts regional retail sales. Schools and institutions are strengthened with additional financial support form a larger tax revenue base. Industrial development should be encouraged and supported.</p>

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

26	2/1/2022	Desdra Dawning	CPA-16 - Community Driven Review of Agricultural Policies and Programs; CPA-1 - Joint Plan Updates; CPA-6 - Nisqually Subarea Plan Update CPA-7a - Grand Mound Subarea Plan Update; Countywide Study of Industrial Lands; CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment; CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment; Black Lake Quarry Site Specific Land Use and Rezoning Amendment; Bar Holdings LLC Site Specific Land Use and Rezoning Amendment; Scott Site Specific Land Use and Rezoning Amendment; A-8 - Habitat Conservation Plan Implementation Ordinance; A-26 - Transfer & Purchase of Development Rights; A-25 - Forest Lands Conversion and Rural Tree Protection Standards; Review SEPA Comment Period Timelines		<p>I support docket items that support agriculture in Thurston County. I ask that you:</p> <ul style="list-style-type: none">- place a high priority on CPA-16 Community Driven Review of Ag.- place a high priority on the County Wide Study of Industrial Lands- include discussion of agricultural lands in the CPA-6 Nisqually Subarea Plan - 1/3 of the work should focus on agriculture since 1/3 of the land in the subarea is ag zoned.- Include discussion of nearby agricultural lands in CPA-7a, the Grand Mound Subarea Plan- Encourage protection of remaining agriculutral land in the UGAs as CPA-1 Joint Plans for Lacey and Olympia are updated- Place high priority on A-8 HCP Implementation and moderate priority on A-26 TDR/PDR and A-25 Forest Lands Conversion- Place a high priority on the review SEPA Comment Timelines - 14 days is not enough <p>I support an effort to comprehensively address industrial uses in Thurston County</p> <ul style="list-style-type: none">- Delay until the next docket cycle the following industrial related proposals: CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry, and Bar Holdings. An Industrial Lands Analysis should be complete first.- Delay Scott Land Use/Rezoning Amendment as it is on woodland and near farms that have been farmed in years past.- Place a high priority on the Countywide Study of Industrial Lands.
28	2/16/2022	Tim Trohimovich, Futurewise	CPA-16 - Community Driven Review of Agricultural Policies and Programs; CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment; CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment;		<p>CPA-16 Community Driven Review of Agriculture: The County should complete this proposal in 2022. Originally, the County agreed to update long-term agricultural lands to incorporate prime farmland soils by the last periodic update due June 30, 2016. The update wasn't adopted until 2019 and did not update the designations. Futurewise appealed the County's failure to update the designation and for almost two years, the County has been working to update this and negotiated time extensions. Futurewise is concerned the project now extends through 2023 as the County continues to process permits and even rezones of land that may qualify for long-term agriculture. Some of these proposals are clearly illegal (reference CPA-19 and CPA-20) and the work that has gone into these proposals could have been put towards the ag update.</p> <p>We urge the County to stop further processing of amendments that violate the GMA and that staff resources should be dedicated to completing CPA-16 in 2022.</p> <p>CPA-19 UP Castle Land Use Amendment: this should not be processed further as it violates the GMA; proposes to allow for urban growth in the rural area. The code amendment to 20.29 TCC also violates the GMA. The County must stop processing this amendment.</p> <p>CPA-20 Beaver Creek Land Use Amendment: this should not be processed further as it violates the GMA; proposes to allow for urban growth in the rural area. Speculative warehouse-distribution buildings are considered urban growth. CPA-20 violates the GMA and cannot be allowed at this site, this amendment must not be processed further.</p>

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

41	1/30/2022	Lynn Fitz-Hugh	A-25 - Forest Lands Conversion and Rural Tree Protection Standards Review SEPA Comment Period Timelines CPA-16 - Community Driven Review of Agricultural Policies and Programs Countywide Study of Industrial Lands A-8 - Habitat Conservation Plan Implementation Ordinance CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment Black Lake Quarry Site Specific Land Use and Rezoning Amendment A-6 - Shoreline Master Program Update and Revisions to Ensure Consistency with Other Codes A-18 - Update Thurston County Agricultural Activities for Consistency with VSP	<p>I strongly encourage you to add A-25 Forest Lands Coverson Ordinance to the docket. The Climate Mitigation Plan calls for both stronger tree protection and more tree planting.</p> <p>I support the new item to review SEPA comment period timelines, as 14 days is not enough time for the public to decide to appeal a SEPA decision.</p> <p>I support CPA-16 Community Driven review of agricultural policies and (new) countywide industrial lands study. The conversion of industrial lands doesn't just affect farmland but also forest land and there are studies showing warehouses produce very little jobs. I support A-8 HCP Implementation.</p> <p>I think that CPA-19 UP Castle, CPA-20 Beaver Creek, and (NEW) Black Lake Quarry land use amendments should all be delayed until the industrial lands study is complete.</p> <p>Also supports A-6 Shoreline Master Program Update and A-18 Thurston County Agricultural Activities Ordinance for Consistency with VSP.</p>
44	2/3/2022	Lisa Ceazan	CPA-16 - Community Driven Review of Agricultural Policies and Programs CPA-1 - Joint Plan Updates CPA-6 - Nisqually Subarea Plan Update CPA-7a - Grand Mound Subarea Plan Update Countywide Study of Industrial Lands CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment Black Lake Quarry Site Specific Land Use and Rezoning Amendment Bar Holdings LLC Site Specific Land Use and Rezoning Amendment Scott Site Specific Land Use and Rezoning Amendment A-8 - Habitat Conservation Plan Implementation Ordinance A-26 - Transfer & Purchase of Development Rights Review SEPA Comment Period Timelines JP-2, JP-3, JP-4 - Tumwater, Lacey, Olympia UGA Zoning Ordinance A-25 - Forest Lands Conversion and Rural Tree Protection Standards Natural Landmark Program	<p>I strongly encourage you to add A-25 Forest Lands Coverson Ordinance to the docket. The Climate Mitigation Plan calls for both stronger tree protection and more tree planting.</p> <p>There should be careful evaluation when converting farmland for industrial uses.</p> <p>I urge the Commissioners to place a high priority on CPA-1, CPA-6, CPA-7a, and CPA-16, as well as the Countywide Industrial Lands Study. Please also place a high priority on the SEPA Comment Review Timelines as 14 days is not enough time to review.</p> <p>I urge the Commissioners to delay to the next docket cycle items that do not support agriculturue and allow for piecemeal industrial development: CPA-19, CPA-20, Black Lake and Bar Holdings. Instead, place a high-prioty on the countywide study of industrial lands. Please also delay the Scott proposal.</p> <p>The Natural Landmark Program should be included on the docket; private landowners should be permitted to exercise their property rights in preservation of old-growth trees.</p>

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

45	2/4/2022	Esther Kronenberg	CPA-16 - Community Driven Review of Agricultural Policies and Programs; CPA-6 - Nisqually Subarea Plan Update CPA-7a - Grand Mound Subarea Plan Update; Countywide Study of Industrial Lands; CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment; CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment; Black Lake Quarry Site Specific Land Use and Rezoning Amendment; A-8 - Habitat Conservation Plan Implementation Ordinance; Review SEPA Comment Period Timelines		<p>Please place a high priority on CPA-16 Community-Driven Review of Ag and a high priority on Coutnywide Study of Industrial Lands. Place a high priority on A-8 HCP Implementation.</p> <p>Include ag discussion in NPA-6 Nisqually Subarea plan, and in CPA-7a Grand Mound Subarea Plan.</p> <p>Please remove the following and any decision to rezone to industrial proposals on land that is farmed or recently farmed: CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry. The full studies on agriculutre and industrial lands in the County should be complete prior to rezones so we have a complete picture of the future land use.</p>
46	2/5/2022	Peggy Smith	CPA-16 - Community Driven Review of Agricultural Policies and Programs; CPA-1 - Joint Plan Updates; CPA 6 - Nisqually Subarea Plan Update CPA-7a - Grand Mound Subarea Plan Update; Countywide Study of Industrial Lands; CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment; CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment; Black Lake Quarry Site Specific Land Use and Rezoning Amendment; Scott Land Use and Rezoning Amendment; A-8 - Habitat Conservation Plan Implementation Ordinance;		<p>Please place a high priority on CPA-16 Community-Driven Review of Ag and a high priority on Coutnywide Study of Industrial Lands. Some of the industrial land proposal are on land that is currently or was recently farmed. Consideration of intensive industrial uses should be made after reconsideration of GMA requirements and be rural and natural resource related in nature: timber, mining, and agriculture. Place a high priority on A-8 HCP Implementation.</p> <p>Include ag discussion in NPA-6 Nisqually Subarea plan, and in CPA-7a Grand Mound Subarea Plan. Encourage protection of remaining agriculture in the UGAs as the Joint Plans are updated under CPA-1.</p> <p>Please delay to the next docket cycle any decision to rezone to industrial proposals on land that is farmed or recently farmed: CPA-19 UP Castle, CPA-20 Beaver Creel, Black Lake Quarry. Please also delay the Scott proposal as it is on woodland and near to other farms.</p>
47	2/5/2022	Diana Moore	CPA-16 - Community Driven Review of Agricultural Policies and Programs Countywide Study of Industrial Lands A-8 - Habitat Conservation Plan Implementation Ordinance CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment Black Lake Quarry Site Specific Land Use and Rezoning Amendment Scott Site Specific Land Use and Rezoning Amendment		<p>I support items that support farmland in Thurston County. Please prioritize CPA-16. Please also prioritize the Countywide Study of Industrial lands. Some of the industrial proposals on the preliminary docket are on land that is currently or was recently farmed. Please prioritize A-8 HCP Implementation as this has a dual purpose for farmland preservation.</p> <p>Please delay to next cycle decisions to rezone lands farmed or recently farmed: CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry.</p> <p>Please delay to next cycle the Scott proposal as it is on woodland and near other farms that have been farmed in years past.</p>

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

77	2/15/2022	Sara Lewis	CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-1 Joint Plan Updates, CPA-6 Nisqually Subarea Plan Update, CPA-7a Grand Mound Subarea Plan Update, Countywide Study of Industrial Lands, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, Black Lake Quarry: Site Specific Land Use and Rezoning Amendment, Bar Holdings: Site Specific Land Use and Rezoning Amendment, Scott: Site Specific Land Use and Rezoning Amendment, A-8 Habitat Conservation Plan Implementation Ordinance, A-18 Thurston County Agricultural Activities Critical Areas Ordinance 17.15 for Consistency with VSP, A-25 Forest Lands Conversion Ordinance & Rural Tree Protection Standards, A-26 - Transfer & Purchase of Development Rights; Review SEPA Comment Period Timelines		<p>I support docket items that support agriculture in Thurston County. I ask that you:</p> <ul style="list-style-type: none"> - place a high priority on CPA-16 Community Driven Review of Ag. - place a high priority on the County Wide Study of Industrial Lands - include discussion of agricultural lands in the CPA-6 Nisqually Subarea Plan - Include discussion of nearby agricultural lands in CPA-7a, the Grand Mound Subarea Plan - Encourage protection of remaining agriculutral land in the UGAs as CPA-1 Joint Plans for Lacey & Olympia are updated - Place high priority on A-8 HCP Implementation- - Place a high priority on the review SEPA Comment Timelines - 14 days is not enough - Place a moderate priority on A-26 TDR and PDR and A-25 Forest Lands Conversion Code <p>I support an effort to comprehensively address industrial uses in Thurston County</p> <ul style="list-style-type: none"> - Delay until the next docket cycle the following industrial related proposals that rezone ag land or recently farmed land: CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry, and Bar Holdings. An Industrial Lands Analysis should be complete first. - Delay Scott Land Use/Rezoning Amendment as it is on woodland and near farms that have been farmed in years past. - Place a high priority on the Countywide Study of Industrial Lands.
80	2/15/2022	Noll Steinweg, WDFW	CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment	Against	<p>The Beaver Creek watershed supports several species of particular interest to WDFW. The Oregon Spotted Frog and Olympic mudminnow are both documented near the subject property. Additionally, a large portion of the property is Designated Federal Critical Habitat for Oregon Spotted Frog. From a desk review, the subject property appears to contain off-channel habitat of Beaver Creek and emergent wetlands, which may support Oregon Spotted Frog and Olympic mudminnow. Agricultural management may also support OSF. Development of the site risks impacting Oregon Spotted Frog habitat directly and also indirectly through loss of agricultural practices such as grazing. Due to the proximity of these species and their habitats to the proposed industrial park and to align with the Growth Management Act goals of RCW 36.70A.020, WDFW recommends the subject property retain its current zoning designation. If the proposal moves forward, WDFW recommends a habitat assessment and management plan be completed to evaluate and address any other potential impacts.</p>
90	2/15/2022	Doug Mah, Thurston County Chamber of Commerce	CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment Countywide Study of Industrial Lands	Support	<p>The Thurston County Chamber strongly recommends including CPA-20 Beaver Creek - Site Specific Land Use and Rezoning Amendment on the official 2022-2023 docket.</p> <p>The Thurston County Chamber further recommends that the Beaver Creek Site Specific Land Use and Rezoning Amendment proceed as submitted in 2020 and reviewed in an independent fashion ahead of any future or proposed countywide study, review, and potential rezone of industrial lands undertaken by Thurston County.</p>

2022-2023 Preliminary Comprehensive Plan and Development Code Dockets

Written Comments

95	2/15/2022	Bonnie Blessing	CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment Bar Holdings: Site Specific Land Use and Rezoning Amendment	Against	If Beaver Creek is approved on the docket, please ask that the proponent do a habitat assessment of the property, ascertain historical water level fluctuations, distribution of Oregon Spotted Frog breeding habitat, and ensure proper planning to adequately protect OSF. There is a proposal at the corner of 93rd and Hwy 99 to light industrial. This proposal would generate land use inconsistent with the forest use of the adjoining land.
110	2/16/2022	Nina Carter	CPA-16 Community Driven Review of Agricultural Policies and Programs Countywide Study of Industrial Lands CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment Black Lake Quarry: Site Specific Land Use and Rezoning Amendment		Support: CPA-16 Community Driven Review of Agricultural Policies and Programs; Countywide Study of Industrial Lands Against: CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment; CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment; Black Lake Quarry: Site Specific Land Use and Rezoning Amendment - I recently retired from serving for over 10 years on the GMHB and have lived in Thurston County for 43 years. Work should continue on the CPA-16 amendment to give farmers opportunities to protect their lands. The Countywide Study of Industrial Lands should be given a high priority; converting farmland to industrial uses should be carefully reviewed against criteria sited in several cases decided by GMHB courts (see Clark and Lewis counties). Some of the considerations on your docket have Agricultural Lands of Long Term Commercial Significance. - Black Lake Quarry should be deleted from further consideration. Allowing the amendment to 20.29 TCC will permit former mined lands to be zoned as RRI. This area is not suited to accomodate industrial traffic. - Delay or delete CPA-19 UP Caslte and CPA-20 Beaver Creek - UP Caslte includes farmland and shouldn't be rezoned; code change would open the door to more rural land converting to RRI; Countywide Industrial Lands Study will given you information if this is suitable to convert. CPA-20 is an environmentally sensitive area, converting would threaten habitat for important wildlife
111	2/16/2022	Michael Cade, Economic Development Council	CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment BAR Holdings LLC Site Specific Land Use and Rezoning Amendment Black Lake Quarry: Site Specific Land Use and Rezoning Amendment CPA-7a - Grand Mound Subarea Plan Update	Support	CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment - support for proposal in consideration of region's employment and economic development capacity necessary for a resilient community and region BAR Holdings LLC Site Specific Land Use and Rezoning Amendment - support is based on long-stated comprehensive planning process to ensure communities are livable and provide a sustainable, quality community Black Lake Quarry: Site Specific Land Use and Rezoning Amendment - support is based on long history of working with proponent and positive impacts this would have to the region by providing employment, alleviate pressure of land conversions elsewhere, and is near to I-5 CPA-7a - Grand Mound Subarea Plan Update - please give a high priority to finishing this item. This is a key area to support economic growth, and is an area where industrial development could occur that would provide significant growth

Written Comments

120	2/16/2022	Elizabeth Dewreede	<div><div>- CPA-16 Community Driven Review of Agricultural Policies and Programs</div><div>- CPA-6 - Nisqually Subarea Plan Update</div><div>- CPA-7a - Grand Mound Subarea Plan Update</div><div>- Countywide Study of Industrial Lands</div><div>- A-8 - Habitat Conservation Plan Implementation Ordinance</div><div>- A-25 - Forest Lands Conversion and Rural Tree Protection Standards</div><div>- A-26 - Transfer & Purchase of Development Rights</div><div>- CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment,</div><div>- CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment,</div><div>- Black Lake Quarry: Site Specific Land Use and Rezoning Amendment,</div></div>		<div>My highest priorities are:</div> <div><div>- CPA-16 - please add this to the work plan</div><div>- Countywide Study of Industrial Lands - in some cases, land that could be converted is agricultural land and we should rely on this for future food and not industrial sites.</div></div> <div><div>- CPA-6 Nisqually Subarea Plan - include discussion of ag lands in this plan</div><div>- CPA-7a Grand Mound Subarea Plan - include discussion of nearby ag lands</div><div>- A-26 - Place a moderate priority on this proposal as these programs exist to preserve farmland.</div></div> <div>I do not support these items and they should be delayed until the next docket cycle:</div> <div><div>- CPA-19 UP Castle, CPA-20 Beaver Creek, Black Lake Quarry</div></div>
121	2/16/2022	Sue Danver	<div><div>- CPA-16 Community Driven Review of Agricultural Policies and Programs</div><div>- Countywide Study of Industrial Lands</div><div>- Black Lake Quarry: Site Specific Land Use and Rezoning Amendment</div><div>- CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment,</div><div>- CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment,</div></div>		<div>Please place a high priority on the Countywide Study of Industrial Lands.</div> <div>The CPA-19 UP Castle and CPA-20 Beaver Creek proposals should be delayed until the study is complete. To make decisions on these proposals would signal support for piecemeal planning. Hundreds of comments opposing the projects were received Its also a time sink for staff to determine how a code for one rural parcel would apply across all parcels. These two proposals demonstrate why its critical the County do a countywide study to comprehensively address when, where, and for what purposes industrial lands should be sited.</div> <div>The Black Lake Quarry proposal should be deleted from further consideration. It's a significant distance from I-5, not on a major arterial road, and the code change wouldn't only apply to this site but an unknown number of mined areas in the county. Mineral lands exist throughout the county and converting mined lands out of their rural designation was never the intention of those who worked on the mineral lands designation policy and related codes.</div> <div>Place a high priority on CPA-16 Community Driven Ag, for all the good reasons provided by the farm advocates.</div>

Written Comments

137	2/16/2022	Rebeca Potasnik	<ul style="list-style-type: none">- Countywide Study of Industrial Lands,- CPA-16 Community Driven Review of Agricultural Policies and Programs,- CPA-1 Joint Plan Updates,- CPA-6 Nisqually Subarea Plan Update,- CPA-7a Grand Mound Subarea Plan Update,- A-8 Habitat Conservation Plan Implementation Ordinance,- A-25 Forest Lands Conversion Ordinance & Rural Tree Protection Standards,- A-26 - Transfer & Purchase of Development Rights- CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment,- CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment,		<p>Please support and prioritize amendments that could support agriculture and farmland preservation in Thurston County:</p> <ul style="list-style-type: none">- Countywide Study of Industrial Lands,- CPA-16 Community Driven Review of Agricultural Policies and Programs,- CPA-1 Joint Plan Updates,- CPA-6 Nisqually Subarea Plan Update,- CPA-7a Grand Mound Subarea Plan Update,- A-8 Habitat Conservation Plan Implementation Ordinance,- A-25 Forest Lands Conversion Ordinance & Rural Tree Protection Standards,- A-26 - Transfer & Purchase of Development Rights <p>Please delay the following and remove from docket cycle if necessary to ensure county completes Countywide Study of Industrial Lands first:</p> <ul style="list-style-type: none">- CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment,- CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment,
139	2/16/2022	Futurewise Board, Holly Gadbow, Janae Huber	<p>CPA-16 - Community Driven Review of Agricultural Policies and Programs;</p> <p>CPA-19 - UP Castle LLC Site Specific Land Use and Rezoning Amendment;</p> <p>CPA-20 - Beaver Creek Site Specific Land Use and Rezoning Amendment;</p>		<p>We are the Board members of Futurewise and support the comments submitted by Tim Trohimovich.</p> <p>(Prioritize CPA-16 for completion in 2022, remove CPA-19 and CPA-20 from further consideration as they are illegal).</p>

From: [Sandler & Seppanen](#)
To: [Maya Teeple](#)
Subject: Written Comments on Preliminary Docket 2022-23
Date: Sunday, January 30, 2022 4:45:33 PM

Maya Teeple and the Board of County Commissioners,

I am writing to you about the following docket items that I recommend as priorities for the coming two years: CPA-16 Community Driven Review of Agricultural Policies and Programs, County Wide Study of Industrial Lands, CPA-6 Nisqually Subarea Plan, CPA-7a Grand Mound Subarea Plan, CPA-1 Joint Plans with Olympia and Lacey, A-8 HCP implementation, A-26 TDR and PDR, A-25 amend forest land conservation code and Review SEPA Comment Review Timelines.

I write to delay for this cycle or delete consideration of these docket items: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry, Bar Holdings, and Scott.

My top priorities are policy related items or projects that can, if you direct, bring a focus on the value of local agricultural.

I support the docket items that support agriculture in Thurston County. I ask you to:

- Place a high priority on **CPA-16 Community Driven Review of Agricultural Policies and Programs** by continuing the work started in 2019. Please add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.
- Place a high priority on the **County Wide Study of Industrial Lands**. Some of the industrial land proposals on the preliminary docket are on land that is currently or recently used for farming, a key industry in the county. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.
- Include discussion of agricultural lands in **CPA-6 Nisqually Subarea Plan** update. When this plan is updated at least one-third of the work should focus on agricultural land as about one-third of the acres in the sub-area are in ag, predominantly designated ag land (Nisqually Ag and Long-term Ag.) Another third of the land is the Nisqually Reservation. I urge you to not only engage the Nisqually Nation in this project but bring the tribe into all planning processes in a government-to-government manner.
- Include discussion of nearby agricultural lands to **CPA-7a Grand Mound Subarea Plan**. The largest block of Nationally Significant Agricultural Land in the county lies directly south and southwest of Grand Mound. Most of that land is designated as Long-Term Ag land. Additional undesignated farmland exists immediately west and east of portions of Grand Mound. In some manner the Subarea Plan should identify how this commercial and more densely populated area does or can provide services to this larger agriculture community. It should also indicate how land use in the Subarea will not conflict with this nearby vital natural resource industry. The Chehalis tribe has already participated in the work to-date on this item. I urge you to not only engage the Chehalis Tribe this project but bring the tribe into all planning processes in a government-to-government manner.
- Encourage protection of the remaining agricultural land in the UGAs as the **CPA-1 Joint Plans with Olympia and Lacey** are updated. I recognize that the agenda for joint plans is set by the city, however, I urge you to request that Olympia and Lacey consider adding the agricultural land protection issues to that agenda.
- Place high priority on **A-8 HCP implementation**. The county proposal includes a portion of funding for the dual purpose of species habitat and farmland preservation through the

purchase of agricultural conservation easements. More such easements are needed to save farmland.

- Place a moderate priority on **A-26 TDR and PDR**. These programs exist to preserve farmland without funding for staff support and for the purchase of development rights other farmland preservation strategies deserve higher consideration.
- Place a moderate priority on **A-25 amend forest land conservation code**. Tree cover is important for climate change mitigation and as a complement to the ecological benefit of farming on the land.

I recommend you remove from the 2022-23 docket items that would not support agricultural in Thurston County

- Delete or delay to the next cycle any decisions to rezone to industrial use the following proposals that are on land that is farmed or recently farmed: **CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry**. An alternative for **Black Lake Quarry** would be a demonstration project by the mining industry proving their ability to return land to woodland or farm use consistent with the immediate surroundings. For climate change reasons funding may exist to support a mining industry project.
- Delay to the next cycle the **Scott proposal** as it is on woodland near other farms and had in years past been farmed. This project may need an SEPA given the location near the Black River. Alternative uses of this woodland should be evaluated in the SEPA in consideration of climate change issues resulting from the removal of woodland for 5 acre lots. The assumption that rural 5-acre lots out of the way of public transportation could meet an “affordable housing” need must be challenged.

I support addressing SEPA comment review timeline issues

- Place a high priority on **Review SEPA Comment Review Timelines**: 14 days is not enough time for a review of for appeal writing purposes the complex factors in agricultural use of land versus other options.

I support an effort to comprehensively address when, where, for what purposes industrial land uses should be allowed in rural Thurston County

- Delay until the next cycle consideration of the following industrial related proposals: **CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry, and Bar Holdings**. To make decisions on these proposal before the industrial lands study is completed would signal support for piecemeal land use planning.
- Place a high priority on the **County Wide Study of Industrial Lands**. The decision to place a warehouse or other intensive industrial use of land in the rural area should be made after reconsideration of GMA requirements that industrial land in the rural area be in services of the natural resources industries: timber, mining, and agriculture.

Thank you for offering the opportunity to provide written comments on the docket items.

Loretta Seppanen
Olympia

From: [Chris Doelman](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Monday, January 31, 2022 10:00:51 AM

Name: Chris Doelman

Email: chrisdoelman@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-20 Beaver Creek:
Site Specific Land Use and Rezoning Amendment

Message: Dear Commissioners,
In advance of the docketing process, I'd like to provide you with information about the docketed item Beaver Creek (CPA-20) requesting a rezone to RRI.

Due to the current conditions of dairy farming in Washington State, we are no longer dairy farming on the property. We have sold all our milk cows. As I've stated in our previous meetings, it was inevitable.

Why is this important? With the cows sold we are looking to act quickly on the transition of the property's use. It is currently zoned RRR1/5 and would make a nice site for mid to high-income homes. But we also understand that this might not best serve the community.

We believe the property's best use is Industrial (RRI), with its proximity to the Interstate, rail access into the Port of Tacoma and major rail lines, land size, and capacity to create jobs and significant wealth for the county. All of this you are aware of, I'm sure.

The intent of this letter is not to convince you of the merits of the rezone, rather to express the urgency. The dairy is gone. My father is 84. The demand for logistic/distribution centers and housing is high. Our family needs to make decisions for our future.

I appreciate the time you've spent over the past year engaging with us in this regard. If you have any questions or comments, please do not hesitate to contact me.

Sincerely,
Chris Doelman

Time: January 31, 2022 at 6:00 pm
IP Address: 174.204.69.59
Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sent by an unverified visitor to your site.

From: [Mark Detmir](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Monday, January 31, 2022 10:03:50 AM

Name: Mark Detmir

Email: Mark.Detmer@am.jll.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-20 Beaver Creek:
Site Specific Land Use and Rezoning Amendment

Message: Dear Sir or Madam,

I am writing this letter to you for the purpose of examining the proposed industrial development in Olympia and Thurston County, and the positive economic and social impact that industrial development has on a community. Industrial spaces create jobs, bring in additional tax revenue, and enhance school districts and other public services, which improve the overall community where the industrial space is located.

Job creation occurs almost immediately with the need of architects, appraisers, surveyors, third party consultants, contractors, and subcontractor trades such as plumbers and electricians. The long-term job creation will result from the many occupiers looking to relocate their business to a new, state-of-the art facility that provides the benefits of operating efficiencies and opportunity for margin enhancement from occupying the newly built space. These newly created jobs bring additional residents to the community who need a place to live, work, and play.

This larger local population positively impacts regional retail sales, creating more demand for local products and supporting local businesses and their employees. This increase in local retail demand results in a corresponding increase in local sales tax revenues. Furthermore, the new property development creates additional property tax revenue for the local community. This newly found capital can be put back into the local community to further enhance and support schools, first responders, and other institutions serving the residents of the community.

As schools and other institutions are improved and strengthened with the additional financial support from a larger tax revenue base, the surrounding community benefits as more people will want to send their children to schools in the area. Strong schools attract families and businesses, further boosting the local economy and driving population growth in a positive feedback loop. Families look for an affordable, top-quality education and a safe neighborhood, and additional resources from commercial development help achieve this need.

In summary, additional construction and permanent jobs, higher property and sales tax revenue from industrial development combine to bring significant economic and social benefits to the local community in Olympia and Thurston County, and should be encouraged and supported.

Thank you for taking the time to read this letter.

Sincerely,
Mark Detmer

Senior Managing Director, Industrial Group Leader
JLL Capital Markets

Time: January 31, 2022 at 6:03 pm

IP Address: 174.204.69.59

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sent by an unverified visitor to your site.

From: [Desdra Dawning](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Tuesday, February 1, 2022 9:27:55 PM

Name: Desdra Dawning

Email: desdradawning@yahoo.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs

Message: Support the docket items that support agriculture in Thurston County

- Place a high priority on CPA-16 Community Driven Review of Agricultural Policies and Programs by continuing the work started in 2019. Please add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.
- Place a high priority on the County Wide Study of Industrial Lands. Some of the industrial land proposals on the preliminary docket at land that is currently or recently used for farming, a key industry in the county. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.
- Include discussion of agricultural lands in CPA-6 Nisqually Subarea Plan update. When this plan is updated at least one-third of the work should focus on agricultural land as about one-third of the acres in the sub-area are in ag, predominantly designated ag land (Nisqually Ag and Long-term Ag.)
- Include discussion of nearby agricultural lands to CPA-7a Grand Mound Subarea Plan. The largest block of Nationally Significant Agricultural Land in the county lies directly south and southwest of Grand Mound. Most of that land is designated as Long-Term Ag land. Additional undesignated farmland exists immediately west and east of portions of Grand Mound. In some manner the Subarea Plan should identify how this commercial and more densely populated area does or can provide services to this larger agriculture community. It should also indicate how land use in the Subarea will not conflict with this nearby vital natural resource industry.
- Encourage protection of the remaining agricultural land in the UGAs as the CPA-1 Joint Plans with Olympia and Lacey are updated.
- Place high priority on A-8 HCP implementation. The county proposal includes a portion of funding for the dual purpose of species habitat and farmland preservation through the purchase of agricultural conservation easements. More such easements are needed to save farmland.
- Place a moderate priority on A-26 TDR and PDR. These programs exist to preserve farmland without funding for staff support and for the purchase of development rights other farmland preservation strategies deserve higher consideration.
- Place a moderate priority on A-25 amend forest land conservation code. Tree cover is

important for climate change mitigation and as a complement to the ecological benefit of farming on the land.

Remove from the 2022-23 docket items that would not support agricultural in Thurston County

- Delay to the next cycle any decisions to rezone to industrial use the following proposals that are on land that is farmed or recently farmed: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry. An alternative for Black Lake Quarry would be a demonstration project by the mining industry proving their ability to return land to woodland or farm use consistent with the immediate surroundings. For climate change reasons funding may exist to support a mining industry project.
- Delay to the next cycle the Scott proposal as it is on land woodland near other farms and had in years past been farmed. This project may need an SEPA given the location near the Black River. Alternative uses of this woodland should be evaluated in the SEPA in consideration of climate change issues resulting from the removal of woodland for 5 acre lots. The assumption that rural 5-acre lots out of the way of public transportation could be meet an “affordable housing” need must be challenged.

Address SEPA comment review timeline issue

- Place a high priority on Review SEPA Comment Review Timelines: 14 days is not enough time for a review of for appeal writing purposes the complex factors in agricultural use of land versus other options.

Comprehensively address when, where, for what purposes industrial land uses should be allowed in rural Thurston County

- Delay until the next cycle consideration of the following industrial related proposals: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry, and Bar Holdings. To make decisions on these proposal before the industrial lands study is completed would signal support for piecemeal land use planning.
- Place a high priority on the County Wide Study of Industrial Lands. The decision to place a warehouse or other intensive industrial use of land in the rural area should be made after reconsideration of GMA requirements that industrial land in the rural area be in services of the natural resources industries: timber, mining, and agriculture.

Time: February 2, 2022 at 5:27 am

IP Address: 73.221.81.250

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>



816 Second Ave, Suite 200, Seattle, WA 98104
p. (206) 343-0681
futurewise.org

February 16, 2022

The Honorable Carolina Mejia
The Honorable Gary Edwards
The Honorable Tye Menser
Board of Commissioners for Thurston County
c/o Maya Teeple Senior Planner
Thurston County Community Planning and Economic Development Department
2000 Lakeridge Dr SW
Olympia, Washington 98502

Dear Commissioners Mejia, Edwards, and Menser:

Subject: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals CPA-16, CPA-19, and CPA-20

Send via email to: maya.teeple@co.thurston.wa.us; travis.burns@co.thurston.wa.us; county.commissioners@co.thurston.wa.us

Thank you for the opportunity to comment on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals. Thurston County should complete CPA-16 in 2022 and should not further process or deny CPA-19 and CPA-20.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Thurston County.

Complete the CPA-16 Community-Driven Review of Agricultural Policies and Programs and related Rural Element Amendments in 2022.

Originally, Thurston County agreed to update the agricultural lands of long-term commercial significance designations to incorporate all of the prime farmland soils by the last comprehensive plan update deadline which was June 30, 2016, for Thurston County. The periodic update was not adopted until November 12, 2019, and did not update the designations of agricultural lands of long-term commercial significance to include all of the prime farmland soils.

Futurewise timely appealed the County's failure to update its designations of agricultural lands of long-commercial significance and related provisions. For almost two years the County has been working to update the designations and related policies and programs under a series of settlement



Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals

February 16, 2022

Page 2

negotiation time extensions.¹ Futurewise recognizes that this work can take time and that the County has limited resources, as we all do. The County's schedules for updating the designations of agricultural lands of long-term commercial significance had the work concluding with a Board of County Commissioner's decision in December 2022.² So Futurewise was very concerned to hear that the decision would not be completed until a year later, December 2023.³

Futurewise is particularly concerned by this schedule slippage because the County continues to process permits and even comprehensive plan amendments and rezones for land that may qualify as agricultural lands of long-term commercial significance. Some of the comprehensive plan amendments are clearly illegal, but the County continues to process them. The work that went into one of these violations of the Growth Management Act, Docket CPA-19, could have significantly advanced the work of bringing the County's agricultural policies and regulations into compliance with the Growth Management Act. We have the same concerns with Preliminary Comprehensive Plan Amendment Docket Proposal CPA-20.

Thurston County Code Section 2.05.020(B)(8) authorizes the County to amend the official docket. We urge the County to stop further processing of the amendments that violate the Growth Management Act and to amend the docket to remove these amendments. The staff resources that would have been used for the illegal amendments should be devoted to completing CPA-16 in 2022. This will advance the County's interest in conserving its working farms in addition to complying with state law.

Docket CPA-19, Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20 Chapter 20.29, violates the Growth Management Act (GMA) because it consists of urban growth and does not qualify as a Type I, Type II, or Type III LAMIRD. Docket CPA-20 should not be further processed.

CPA-19, should not be processed further because it violates the GMA by allowing urban growth in rural areas. The applicant is proposing to use the site for warehousing and manufacturing.⁴

The Washington State Supreme Court has concluded that:

¶ 5 LAMIRDs are not intended for continued use as a planning device, rather, they are "intended to be a one-time recognition of existing areas and uses and are not

¹ *Futurewise v. Thurston County*, WWRGMHB Case No. 20-2-0001, Order on Dismissal of Issue No. 3 and Settlement Extension for Issue Nos. 1 and 2 (Feb. 24, 2020).

² See for example Thurston County's Status Report and Motion For 90-Day Extension (Nov. 2, 2021) Appendix 1 p. 2 of 2.

³ Thurston County's Status Report and Motion For 90-Day Extension (Jan. 31, 2022) Appendix 1 p. 2 of 2.

⁴ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report p. 1 last accessed on Feb. 15, 2022, at: <https://www.thurstoncountywa.gov/planning/planningdocuments/CP-19%20-%20PC%20Staff%20Memo%20-%20Up%20Castle.pdf>.

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 3

intended to be used continuously to meet needs (real or perceived) for additional commercial and industrial lands.” *People for a Liveable Cmty. v. Jefferson County*, No. 03–2–0009c, 2003 GMHB LEXIS 34, at *2 (W. Wash. Growth Mgmt. Hr’gs Bd. Final Dec. and Order Aug. 22, 2003). (In general, planning in rural zones must “protect the rural character of the area” and “contain[] or otherwise control[] rural development.” RCW 36.70A.070(5)(c), (i)).⁵

For these reasons the Growth Management Act contains specific standards that limited areas of more intense rural development (LAMIRDs) must meet.

The Growth Management Act also prohibits urban growth in rural areas.⁶ The proposed CPA-19 comprehensive plan amendment, rezone, and code amendments all apply to the rural area.⁷ RCW 36.70A.030(28) defines “urban growth” as

growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth.

Warehouses qualify as urban growth because they cover most or even all of a lot with large buildings and impervious surfaces such as paving.⁸ Therefore they are “incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands” There is simply not enough open land left to farm where warehouses are constructed. So, warehouses qualify as “urban growth” and are prohibited in rural areas.⁹

The definition of urban growth in RCW 36.70A.030(28) provides that more intense rural developments allowed by RCW 36.70A.070(5)(d) are not urban growth. However, Docket CPA-19 and the Up Castle Code Amendment Chapter 20.29 do not meet the requirements in RCW 36.70A.070(5)(d).

⁵ *Gold Star Resorts, Inc. v. Futurewise*, 167 Wn.2d 723, 727–28, 222 P.3d 791, 793 (2009).

⁶ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

⁷ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report pp. 1 – 2 & pp. 4 – 6.

⁸ See the aerial image from the Thurston County Property Map for Parcel 44160000300 and the “Basic Info,” “Structures,” and “Land” tabs in the file “44160000300 Aerial & Data.pdf” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

⁹ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals

February 16, 2022

Page 4

The Growth Management Hearings Board, a state agency charged with interpreting the Growth Management Act, held:

Therefore, when the Board reviewed how the LAMIRDs were defined and the uses allowed in them it found contradictions and violations of the GMA. For example, as for Type I LAMIRDs, the GMA provides: “Any development or redevelopment in terms of building size, scale, use, or intensity shall be consistent with the character of the existing areas.”¹⁸⁴ An “existing area” or “existing use” is one that was in existence on July 1, 1990.¹⁸⁵ The fundamental problem of the County’s approach is that its development regulations fail to limit LAMIRDs in the manner required by the GMA. Rather than determining the size, scale, use and intensity of uses that existed in a particular area to be designated as a LAMIRD, and limiting future development in the LAMIRD on that basis, the County instead allows uses in a particular LAMIRD based on the zoning designation applied to a LAMIRD, regardless of whether those uses were present in that LAMIRD on July 1, 1990.

¹⁸⁴ RCW 36.70A.070(5)(d)(i)(C) [& RCW 36.70A.070(5)(d)(v)].

¹⁸⁵ RCW 36.70A.070(5)(d)(v)(A).¹⁰

The 1990 aerial image from Google Earth shows that that 5641 and 5505 222nd Avenue SW were actively used as a farm.¹¹ So 5641 and 5505 222nd Avenue SW, the location of CPA-19, do not qualify as a Type I LAMIRD under RCW 36.70A.070(5)(d)(i) since there was no existing area and no existing warehouse, industrial, or manufacturing uses in 1990.

The proposal does not involve any small-scale recreational or tourist uses.¹² So it does not qualify as a Type II LAMIRD under RCW 36.70A.070(5)(d)(ii).

RCW 36.70A.070(5)(d)(iii) provides in relevant part that Type III LAMIRDs are:

(iii) The intensification of development on lots containing isolated nonresidential uses or new development of isolated cottage industries and isolated small-scale businesses that are not principally designed to serve the existing and projected rural population and nonresidential uses, but do provide job opportunities for rural residents. Rural counties may allow the expansion of small-scale businesses as long as

¹⁰ *Futurewise, Governors Point Development Company, Triple R. Residential Construction, Inc. and the Sablin Family, Eric Hirst, Laura Leigh Brakke, Wendy Harris and David Stalheim, and City of Bellingham v. Whatcom County*, Western Washington Region Growth Management Hearings Board (WWRGMHB) Case No. 11-2-0010c, Final Decision and Order & WWRGMHB Case No. 05-2-0013, Order Following Remand on Issue of LAMIRDs (Jan. 9, 2012), at 92 of 177.

¹¹ 5641 and 5505 222nd Avenue SW 1990 Aerial Image in the files “5505 222nd Ave SW 1990.pdf” and “Aerial Image 5505 222nd Ave SW 1990 Aerial Image.png” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹² Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report pp. 1 – 12.

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
Docket Proposals

February 16, 2022

Page 5

those small-scale businesses conform with the rural character of the area as defined by the local government according to RCW 36.70A.030(23). Rural counties may also allow new small-scale businesses to utilize a site previously occupied by an existing business as long as the new small-scale business conforms to the rural character of the area as defined by the local government according to RCW 36.70A.030(23).

The Growth Management Hearings Board has concluded that “[a]n isolated use, then, must be one that is set apart from others. The Legislature’s use of the term ‘isolated’ for both cottage industry and small-scale businesses demonstrates an unambiguous intention to ensure that any commercial uses established by the mechanism of a type (d)(iii) LAMIRD be set apart from other such uses.”¹³ But 5641 and 5505 222nd Avenue SW are not set apart from other such uses, they are immediately adjacent to several large warehouses and industrial facilities.¹⁴ Nor is 5641 and 5505 222nd Avenue SW the site of a previously existing non-farm business.¹⁵ So the comprehensive plan amendment and rezone in Docket CPA-19 violates RCW 36.70A.070(5)(d)(iii). So, CPA-19 should not be processed further.

Docket CPA-19’s zoning text amendment to Chapter 20.29 also violates RCW 36.70A.070(5)(d)(iii). That amendment requires the opposite of what RCW 36.70A.070(5)(d)(iii) requires. Instead of requiring the uses to be isolated as RCW 36.70A.070(5)(d)(iii) does, the text amendment provides that the Rural Resource Industrial District (RRI) may be “adjacent to an existing industrial development utilizing existing county roads”¹⁶ This change very clearly violates RCW 36.70A.070(5)(d)(iii). The County must stop processing amendment CPA-19.

¹³ *Better Brinnon Coalition v. Jefferson County*, Western Washington Growth Management Hearings Board (WWGMHB) Case No. 03-2-0007 Compliance Order (June 23, 2004), at *7 of 14, 2004 WL 1864628 at *4; *James A. Whitaker v. Grant County*, Eastern Washington Growth Management Hearings Board (EWGMHB) Case No. 99-1-0019 Second Order on Compliance (Nov. 1, 2004), at *6, 2004 WL 2624887 at *4 quoting *Better Brinnon Coalition*.

¹⁴ See the Google Earth Aerial Image of 5505 222nd Ave SW with the filename “5505 222nd Ave SW and Adjoining Warehouses.pdf” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021). The author of this letter is an expert in interpreting aerial images for planning purposes.

¹⁵ *Id.*; 5641 and 5505 222nd Avenue SW 1990 Aerial Image in the files 5505 222nd Ave SW 1990.pdf and Aerial Image 5505 222nd Ave SW 1990 Aerial Image.png enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹⁶ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report Attachment B: Thurston County Zoning Ordinance (Title 20) p. *2.

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 6

Docket CPA-20, Beaver Creek: Site Specific Map Land Use Plan and Rezoning Amendment of approximately 390 acres from RRR 1/5 to RRI, violates the Growth Management Act (GMA) because it consists of urban growth and does not qualify as a Type I, Type II, or Type III LAMIRD. Docket CPA-20 should not be further processed.

Like CPA-19, CPA-20, should not be processed further because it violates the GMA by allowing urban growth in rural areas. CPA-20 proposes to “[c]onstruct 5 speculative warehouse-distribution buildings of approximately 2,960,000 [square feet] SF with associated access and drive aisle improvements.”¹⁷

Speculative warehouse-distribution buildings are urban growth. They qualify as urban growth because they cover most of a lot with large buildings and impervious surfaces such as paving.¹⁸ Therefore they are “incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands” There is simply not enough open land left to farm where warehouses are constructed. Therefore, warehouses qualify as “urban growth” and are prohibited in rural areas.¹⁹

The definition of urban growth in RCW 36.70A.030(28) provides that more intense rural developments allowed by RCW 36.70A.070(5)(d) is not urban growth. However, Docket CPA-20 does not meet the requirements in RCW 36.70A.070(5)(d).

The 1990 aerial image from Google Earth shows that that 13333 Case Rd SW, Olympia WA 98512 was actively used as a farm.²⁰ So 13333 Case Rd SW, Olympia WA 98512 does not qualify as a Type I LAMIRD under RCW 36.70A.070(5)(d)(i) since there was no existing area and no existing warehouse, industrial, or manufacturing uses on the land in 1990.

The proposal does not involve any small-scale recreational or tourist uses.²¹ So it does not qualify as a Type II LAMIRD under RCW 36.70A.070(5)(d)(ii).

¹⁷ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm) last accessed on Feb. 15, 2022, at

<https://weblink.co.thurston.wa.us/DSPublic/customsearch.aspx?searchname=search&dbid=0>.

¹⁸ See the aerial image from the Thurston County Property Map for Parcel 44160000300 and the “Basic Info,” “Structures,” and “Land” tabs in the file “44160000300 Aerial & Data.pdf” enclosed in a separate email with Futurewise letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹⁹ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

²⁰ Aerial image (6/20/1990) of the CPA-20 vicinity enclosed in a separate email with the filename “CPA-20 1990 Aerial Image.pdf.”

²¹ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm).

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
Docket Proposals

February 16, 2022

Page 7

RCW 36.70A.070(5)(d)(iii) provides in relevant part that Type III LAMIRDs are:

(iii) The intensification of development on lots containing isolated nonresidential uses or new development of isolated cottage industries and isolated small-scale businesses that are not principally designed to serve the existing and projected rural population and nonresidential uses, but do provide job opportunities for rural residents. Rural counties may allow the expansion of small-scale businesses as long as those small-scale businesses conform with the rural character of the area as defined by the local government according to RCW 36.70A.030(23). Rural counties may also allow new small-scale businesses to utilize a site previously occupied by an existing business as long as the new small-scale business conforms to the rural character of the area as defined by the local government according to RCW 36.70A.030(23).

The Growth Management Hearings Board has concluded that “[a]n isolated use, then, must be one that is set apart from others. The Legislature’s use of the term ‘isolated’ for both cottage industry and small-scale businesses demonstrates an unambiguous intention to ensure that any commercial uses established by the mechanism of a type (d)(iii) LAMIRD be set apart from other such uses.”²² But 13333 Case Rd SW is not set apart from other such uses, it is adjacent to Freightliner Northwest. Nor is 13333 Case Rd SW the site of a previously existing non-farm business.²³ Docket CPA-20 is not a small-scale business, it proposes the construction of “5 speculative warehouse-distribution buildings of approximately 2,960,000 SF with associated access and drive aisle improvements.”²⁴ So the comprehensive plan amendment and rezone in Docket CPA-20 violates RCW 36.70A.070(5)(d)(iii).

In sum, CPA-20 violates the Growth Management Act and cannot be allowed at this site. This amendment must not be further processed.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 or email: tim@futurewise.org.

²² *Better Brinnon Coalition v. Jefferson County*, Western Washington Growth Management Hearings Board (WWGMHB) Case No. 03-2-0007 Compliance Order (June 23, 2004), at *7 of 14, 2004 WL 1864628 at *4 & *James A. Whitaker v. Grant County*, Eastern Washington Growth Management Hearings Board (EWGMHB) Case No. 99-1-0019 Second Order on Compliance (Nov. 1, 2004), at *6, 2004 WL 2624887 at *4 quoting *Better Brinnon Coalition*.

²³ Aerial image (6/20/1990) of the CPA-20 vicinity enclosed in a separate email with the filename “CPA-20 1990 Aerial Image.pdf.”

²⁴ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm).

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment

Docket Proposals

February 16, 2022

Page 8

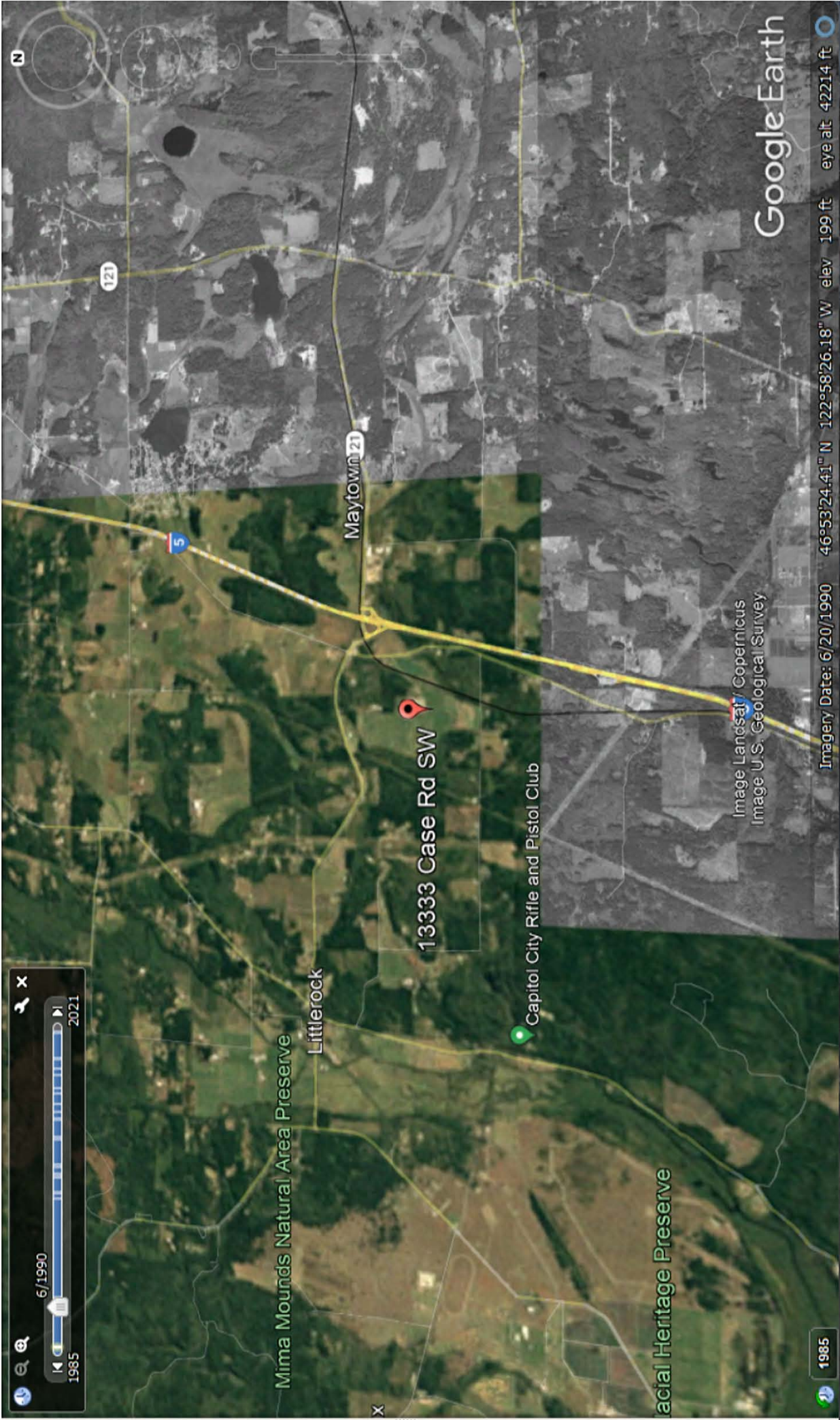
Very Truly Yours,

A handwritten signature in blue ink, consisting of two stylized, overlapping 'S' or 'E' shaped loops.

Tim Trohimovich, AICP, WSBA No. 22367

Director of Planning and Law

Enclosure (in a separate email)



From: [Thomasina Cooper](#)
To: [Maya Teeple](#)
Subject: FW: personal announcement and re: the docket A-25 Amend Forest land conservation code
Date: Thursday, February 3, 2022 1:52:10 PM

Hi Maya-
 Hope all is well!

Tye and I received the email below from Lynn Fitz-Hugh, and she included public comment about a number of docket items. Can you see that they are included as appropriate in the record?

Thanks so much!
 Thomasina

From: Lynn Fitz-Hugh <lynn@fitz-hugh.org>
Sent: Thursday, February 3, 2022 12:39 PM
To: Tye Menser <tye.menser@co.thurston.wa.us>; Thomasina Cooper <thomasina.cooper@co.thurston.wa.us>
Subject: personal announcement and re: the docket A-25 Amend Forest land conservation code

Hi Tye:

Just wanted to let you know that I have resigned as TCAT Program director. Decided I need to do my climate work in a slightly different way. But I do think you will still see me testifying and showing up with other folks on stuff. I would say how deeply I have appreciated working with you but I don't think that is past tense....it will continue.

And in that vein, as you know it is time to update **A-25 Amend forest land conservation** item that you got added to the docket two years ago. I am excited by the work Ashley Arai has already done to sort through the confusion you previously experienced about what the county codes actually say about trees – it is so good to have it clear and consolidated. I think she has done a good job of identifying next steps. I think having a lidar study of the county will aid any planning the county does but also be foundational for creating a regional plan for forestation under the TCMP, I also love the idea of sort of addressing differently the UGA areas from the rural areas. I did not know they could be treated differently and that was what was always hanging me up on advising how the county might go about this. I think setting canopy goals in another really important thing. That sort of helps track whether we are making progress, staying the same or sliding. It helps inform policy. **I support all 3 scoping suggestions** as we need more not less done about our trees.

There are a number of issues for protecting farmland that also overlap with how trees are handled in our county. For example, I support the new item of supporting a **review SEPA comment review Timelines**. 14 days is not enough time for the public to decide to appeal a SEPA decision. Look how many months/years companies have to prepare for these permits. The decision to appeal is a commitment to time and money. Citizen's need more than 14 days to evaluate complex decisions that impact farms, forests, and waterways.

Also to this end I also support **the CPA-16 Community Driven Review of Agricultural Policies and Programs**, and the **County Wide study of Industrial lands**. The conversion to industrial lands does not just effect farmland but also forest land – and there are studies showing that warehouse produce very little jobs. **The A-8 HCP implementation** – those easements are often where trees are.

I think that **CPA-5 UP Castle, CPA-Beaver Creek Dairy, Black Lake Quarry should all be delayed** until after the industrial lands study is completed.

Thank you for your consideration of these thoughts,

Lynn Fitz-Hugh

From: [Lisa Ceazan](#)
To: [County Commissioners](#)
Subject: Include A-25, Update Forest Conversion Ordinance and Review Rural Tree Protection Standards on the docket.
Date: Thursday, February 3, 2022 1:27:20 PM

Dear Thurston County Commissioners,

I strongly support including A-25, Update Forest Conversion Ordinance and Review Rural Tree Protection Standards on the docket for 2022-2023.

The Climate Mitigation Plan, which you have signed, calls for both stronger tree protection and more tree planting. We know the Mitigation Plan cannot succeed without sequestration, and the NW forest is second only to the Amazon in its ability to sequester carbon.

Thank you for your efforts and your attention to this important topic.

Sincerely,

Lisa Ceazan

From: [Lisa Ceazan](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Monday, February 14, 2022 3:04:59 PM

Name: Lisa Ceazan

Email: lisaceazan@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-1 Joint Plan Updates, CPA-6 Nisqually Subarea Plan Update, CPA-7a Grand Mound Subarea Plan Update, (New) Countywide Study of Industrial Lands, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (New) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment, (New) Bar Holdings: Site Specific Land Use and Rezoning Amendment, (New) Scott: Site Specific Land Use and Rezoning Amendment, A-8 Habitat Conservation Plan Implementation Ordinance, A-26 Transfer & Purchase of Development Rights Programs, (New) Review SEPA Comment Period Timelines, JP-2, JP-3, JP-4 Update Tumwater, Lacey & Olympia UGA Zoning Ordinances for Consistency with City

Message: We must protect and conserve Thurston County's agricultural lands. There must be careful evaluation of the impacts of converting farmland and natural areas for industrial use and how necessary this conversion is to the local communities and the county as a whole. A greater, nutritious food supply, more agricultural jobs, and assisting in our fight against climate change affects are important and valuable benefits and should be encouraged, supported and enlarged. Therefore, I urge the commissioners to make the following a high priority on the upcoming docket: CPA-1, CPA-6, CPA-7, and CPA-16, along with the Countywide Study of Industrial Lands.

Following the above reasoning, I urge the commissioners to delay to the next cycle consideration of these proposed docket items that would not support local agriculture and would allow piecemeal industrial development: CPA-5, CPA-20 Beaver Creek Dairy, Black lake Quarry and Bar Holdings. Instead, place a high priority on a County Wide Study of Industrial Lands. Please also delay to the next cycle the Scott Proposal, which needs serious evaluation regarding its practicality as a place for affordable housing and for its impact on precious woodland habitat.

Lastly, please place a high priority on Review SEPA Comment Review Timelines. 14 days is not enough time for a review of the complex factors in agricultural use of land versus other options. Though not directly related and not under the BoCC's jurisdiction, I give the example of the protests against the ill-considered Panattoni development in Tumwater, which has had no SEPA review. We need a thorough SEPA review for any proposed development project that will affect our local agriculture, our local ecosystems and that might also contribute to more pollution and climate change affects.

Time: February 14, 2022 at 11:04 pm
 IP Address: 73.221.224.197

From: [Lisa Ceazan](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Wednesday, February 16, 2022 4:04:46 PM

Name: Lisa Ceazan

Email: lisaceazan@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: (Prelim) Natural Landmark Program

Message: The Natural Landmark Program should be included in the docket. Private landowners should be permitted to exercise their property rights by ensuring the preservation of old-growth trees in and any other natural landmarks in perpetuity. The benefits to them, their families, future owners and the community at large will be significant.

Time: February 17, 2022 at 12:04 am

IP Address: 73.221.224.197

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sent by an unverified visitor to your site.

From: [Esther Grace Kronenberg](#)
To: [Maya Teeple](#)
Subject: Thurston County Planning docket for 2022-23
Date: Friday, February 4, 2022 3:51:56 PM

Hello Maya Teeple,

I would like to comment on the Planning Docket for the coming two years.

As an advocate for clean water and the environment, I've been concerned with the many applications coming into the County to rezone agricultural land or land in rural areas for light industrial and warehouse use. I believe this is a misguided, short-sighted use of these valuable lands that will not help us deal effectively with the dwindling resources and climate disruptions that are imminent.

Please submit these suggestions regarding the Docket into the agency record.

-Please amend the SEPA Comment Review Timelines. 14 days is not enough time for a review of the complexities of land uses.

- The County should place a high priority on the County Wide Study of Industrial Lands. We should not be using land with high quality soils on which our future food production may depend for industrial use, especially as agriculture is a key industry in the County. The GMA requires that rural industrial lands should serve the purposes of those rural areas, e.g., timber, mining and agriculture. Warehouses do not fit this criteria. I would hate to see beautiful south Thurston County become a huge parking lot for trucks delivering goods for Amazon and other behemoths.

- I would also like to see the County place a high priority on CPA-16 Community Driven Review of Agricultural Policies and Programs, and continue the work that was started in 2019.

- Agricultural lands should also be considered in the CPA-6 Nisqually Subarea Plan since about 1/3 of the acreage in the area is designated agricultural land.

- Agricultural lands should also be considered in the CPA-7a Grand Mound Subarea Plan, much of which is designated as Long-Term Ag land. How can this commercial area enhance and support the agricultural community here, and vice-versa?

- I would like to see the County place a high priority on A-8 HCP implementation, especially that which funds both species habitat and farmland preservation through agricultural conservation easements. These easements are a viable way to preserve farmland and should be encouraged.

- As for those items I would like to see removed, please include the following proposed rezones of agricultural lands to industrial use - CPA-5 Up Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry. I know the Planning Commission is looking at doing a review of all industrial and agricultural uses in the County, and this work should be completed before any rezoning is enacted so we have a complete picture of future land use.

Please respect and preserve the rural character of South County and Nisqually. It is an investment for the future!

Thank you.

Esther Kronenberg

From: [R Peggy Smith](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Saturday, February 5, 2022 1:30:22 PM

Name: R Peggy Smith

Email: rpps4u@comcast.net

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-1 Joint Plan Updates, CPA-6 Nisqually Subarea Plan Update, CPA-7a Grand Mound Subarea Plan Update, (New) Countywide Study of Industrial Lands, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (New) Scott: Site Specific Land Use and Rezoning Amendment, A-8 Habitat Conservation Plan Implementation Ordinance

Message: February 5, 2022

Dear County Commissioners.

I am writing to express my opinions about what I see as priorities as you set the Thurston County planning docket for the coming two-year period.

I was a home owner in Olympia for nearly 40 years, and for the last five years I have lived in an apartment in downtown Olympia. While I have lived in the urban area of the County, I have a major interest in in preservation of rural, particularly farming, areas.

I would like you to support items that work to protect farmlands:

Please place a high priority on CPA-16 Community Driven Review of Agricultural Policies and Programs by continuing the work started in 2019. You should add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.

Please place a high priority on the County Wide Study of Industrial Lands. Some of the industrial land proposals on the preliminary docket at land that is currently or recently used for farming, a key industry in the county. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.

I think you should include discussion of agricultural lands in CPA-6 Nisqually Subarea Plan update. When this plan is updated at least one-third of the work should focus on agricultural land as about one-third of the acres in the sub-area are in ag, predominantly designated ag land (Nisqually Ag and Long-term Ag.)

Likewise, please Include discussion of nearby agricultural lands to CPA-7a Grand Mound Subarea Plan. The largest block of Nationally Significant Agricultural Land in the county lies directly south and southwest of Grand Mound. Most of that land is designated as Long-Term Ag land. Additional undesignated farmland exists immediately west and east of portions of Grand Mound. In some manner the Subarea Plan should identify how this commercial and more densely populated area does or can provide services to this larger agriculture community. It should also indicate how land use in the Subarea will not conflict with this nearby vital natural resource industry.

Please encourage protection of the remaining agricultural land in the UGAs as the CPA-1 Joint Plans with Olympia and Lacey are updated.

Finally, I would like you to place high priority on A-8 HCP implementation. The county proposal includes a portion of funding for the dual purpose of species habitat and farmland preservation through the purchase of agricultural conservation easements. More such easements are needed to save farmland.

There are also items I think you should remove from the 2022-23 docket. These are ones that would not support agricultural in Thurston County:

Please delay to the next cycle any decisions to rezone to industrial use the following proposals that are on land that is farmed or recently farmed: CPA-19 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry. An alternative for Black Lake Quarry would be a demonstration project by the mining industry proving their ability to return land to woodland or farm use consistent with the immediate surroundings. For climate change reasons funding may exist to support a mining industry project.

Also delay to the next cycle the Scott proposal as it is on land woodland near other farms and had in years past been farmed. This project may need an SEPA given the location near the Black River. Alternative uses of this woodland should be evaluated in the SEPA in consideration of climate change issues resulting from the removal of woodland for 5 acre lots. The assumption that rural 5-acre lots out of the way of public transportation could be meet an “affordable housing” need must be challenged.

As a final recommendation:

I think you should place a high priority on the County Wide Study of Industrial Lands. The decision to place a warehouse or other intensive industrial use of land in the rural area should be made after reconsideration of GMA requirements that industrial land in the rural area be in services of the natural resources industries: timber, mining, and agriculture.

Thank you for your consideration of my suggestions and concerns.

R Peggy Smith

Time: February 5, 2022 at 9:30 pm

IP Address: 73.221.129.191

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sent by an unverified visitor to your site.

From: [Diana Moore](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Saturday, February 5, 2022 4:06:15 PM

Name: Diana Moore

Email: dianamoore1814@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (New) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment, (New) Scott: Site Specific Land Use and Rezoning Amendment

Message: I support the docket items that support and sustain farmland in Thurston County. Please prioritize CPA-16 Community Driven Review of Agricultural Policies and Programs by continuing the work started in 2019. I suggest you add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.

Also prioritize the County Wide Study of Industrial Lands. Some of the industrial land proposals on the preliminary docket is land that is currently or recently used for farming, a key industry in the county. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.

Please prioritize A-8 HCP implementation. The county proposal includes a portion of funding for the dual purpose of species habitat and farmland preservation through the purchase of agricultural conservation easements. More such easements are needed to save farmland.

Please delay to the next cycle any decisions to rezone to industrial use the following proposals that are on land that is farmed or recently farmed: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry. An alternative for Black Lake Quarry would be a demonstration project by the mining industry proving their ability to return land to woodland or farm use consistent with the immediate surroundings. For climate change reasons funding may exist to support a mining industry project.

Please delay to the next cycle the Scott proposal as it is on woodland near other farms and had in years past been farmed. This project may need an SEPA given the location near the Black River. Alternative uses of this woodland should be evaluated in the SEPA in consideration of climate change issues resulting from the removal of woodland for 5 acre lots. The assumption that rural 5-acre lots out of the way of public transportation could be meet an affordable housing need should be challenged.

Thank you.

Time: February 6, 2022 at 12:06 am

From: [Sara Lewis](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Tuesday, February 15, 2022 8:04:53 AM

Name: Sara Lewis

Email: carbonsmom@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-1 Joint Plan Updates, CPA-6 Nisqually Subarea Plan Update, CPA-7a Grand Mound Subarea Plan Update, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (New) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment, (New) Bar Holdings: Site Specific Land Use and Rezoning Amendment, (New) Scott: Site Specific Land Use and Rezoning Amendment, A-8 Habitat Conservation Plan Implementation Ordinance, A-18 Thurston County Agricultural Activities Critical Areas Ordinance 17.15 for Consistency with VSP, A-25 Forest Lands Conversion Ordinance & Rural Tree Protection Standards, (New) Review SEPA Comment Period Timelines

Message: Support the docket items that support agriculture in Thurston County

- Place a high priority on CPA-16 Community Driven Review of Agricultural Policies and Programs by continuing the work started in 2019. Please add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.
- Place a high priority on the County Wide Study of Industrial Lands. Some of the industrial land proposals on the preliminary docket at land that is currently or recently used for farming, a key industry in the county. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.
- Include discussion of agricultural lands in CPA-6 Nisqually Subarea Plan update. When this plan is updated at least one-third of the work should focus on agricultural land as about one-third of the acres in the sub-area are in ag, predominantly designated ag land (Nisqually Ag and Long-term Ag.)
- Include discussion of nearby agricultural lands to CPA-7a Grand Mound Subarea Plan. The largest block of Nationally Significant Agricultural Land in the county lies directly south and southwest of Grand Mound. Most of that land is designated as Long-Term Ag land. Additional undesignated farmland exists immediately west and east of portions of Grand Mound. In some manner the Subarea Plan should identify how this commercial and more densely populated area does or can provide services to this larger agriculture community. It should also indicate how land use in the Subarea will not conflict with this nearby vital natural resource industry.
- Encourage protection of the remaining agricultural land in the UGAs as the CPA-1 Joint Plans with Olympia and Lacey are updated.

- Place high priority on A-8 HCP implementation. The county proposal includes a portion of funding for the dual purpose of species habitat and farmland preservation through the purchase of agricultural conservation easements. More such easements are needed to save farmland.
- Place a moderate priority on A-26 TDR and PDR. These programs exist to preserve farmland without funding for staff support and for the purchase of development rights other farmland preservation strategies deserve higher consideration.
- Place a moderate priority on A-25 amend forest land conservation code. Tree cover is important for climate change mitigation and as a complement to the ecological benefit of farming on the land.

Remove from the 2022-23 docket items that would not support agricultural in Thurston County

- Delay to the next cycle any decisions to rezone to industrial use the following proposals that are on land that is farmed or recently farmed: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry. An alternative for Black Lake Quarry would be a demonstration project by the mining industry proving their ability to return land to woodland or farm use consistent with the immediate surroundings. For climate change reasons funding may exist to support a mining industry project.
- Delay to the next cycle the Scott proposal as it is on land woodland near other farms and had in years past been farmed. This project may need an SEPA given the location near the Black River. Alternative uses of this woodland should be evaluated in the SEPA in consideration of climate change issues resulting from the removal of woodland for 5 acre lots. The assumption that rural 5-acre lots out of the way of public transportation could be meet an “affordable housing” need must be challenged.

Address SEPA comment review timeline issue

- Place a high priority on Review SEPA Comment Review Timelines: 14 days is not enough time for a review of for appeal writing purposes the complex factors in agricultural use of land versus other options.

Comprehensively address when, where, for what purposes industrial land uses should be allowed in rural Thurston County

- Delay until the next cycle consideration of the following industrial related proposals: CPA-5 UP Castle, CPA-20 Beaver Creek Dairy, Black Lake Quarry, and Bar Holdings. To make decisions on these proposal before the industrial lands study is completed would signal support for piecemeal land use planning.
- Place a high priority on the County Wide Study of Industrial Lands. The decision to place a

warehouse or other intensive industrial use of land in the rural area should be made after reconsideration of GMA requirements that industrial land in the rural area be in services of the natural resources industries: timber, mining, and agriculture.

Time: February 15, 2022 at 4:04 pm

IP Address: 73.221.218.188

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sent by a verified WordPress.com user.



State of Washington
Department of Fish and Wildlife

Mailing Address: PO Box 43200, Olympia, WA 98504-3200, (360) 902-2200, TDD (360) 902-2207
 Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

February 15, 2022

Previously submitted March 18, 2021

Maya Teeple
 Thurston County Community Planning & Economic Development
 Community Planning Division
 2000 Lakeridge Dr SW, Bldg 1, Olympia, Washington 98502
maya.teeple@co.thurston.wa.us

Subject: Comp Plan Amendment for Beaver Creek Industrial Park, CP-20

Dear Ms. Teeple,

Thank you for the opportunity to review materials for the proposed Beaver Creek Industrial Park. The Washington Department of Fish and Wildlife (WDFW) has reviewed the project and offers the following comments at this time. Other comments may be offered in the future.

The Beaver Creek watershed supports several species of particular interest to WDFW. The Oregon Spotted Frog (*Rana pretiosa*, state status: Endangered, federal status: Threatened) and Olympic mudminnow (*Novumbra hubbsi*, state status: Sensitive) are both documented to occur near the subject property. Additionally, a large portion of the subject property (Figure 1) is Designated Federal Critical Habitat for Oregon Spotted Frog. From a desk-review, the subject property appears to contain off-channel habitat of Beaver Creek and emergent wetlands which may support both Oregon Spotted Frog and Olympic mudminnow.

Agricultural management of this property may also support Oregon Spotted Frog habitat through practices such as grazing (Oregon Spotted Frog prefer short emergent vegetation for breeding). Development of the site risks impacting Oregon Spotted Frog habitat directly, and also indirectly through loss of agricultural practices such as grazing.

Due to the proximity of these species and their habitats to the proposed industrial park, and to align with the Growth Management Act goals set forth in RCW 36.70A.020, WDFW recommends that the subject property retain its current zoning designation. If the proposal to rezone and develop the site into an industrial park moves forward, WDFW recommends a habitat assessment and management plan be completed to evaluate and address any potential impacts to Oregon Spotted Frog, Olympic mudminnow, and other species using the site.

Thank you for the opportunity to review these materials and please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicky Jones", is written below the word "Sincerely,".



State of Washington
Department of Fish and Wildlife

Mailing Address: PO Box 43200, Olympia, WA 98504-3200, (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

Noll Steinweg
WDFW Habitat Biologist
Noll.Steinweg@dfw.wa.gov
(360) 628-2173

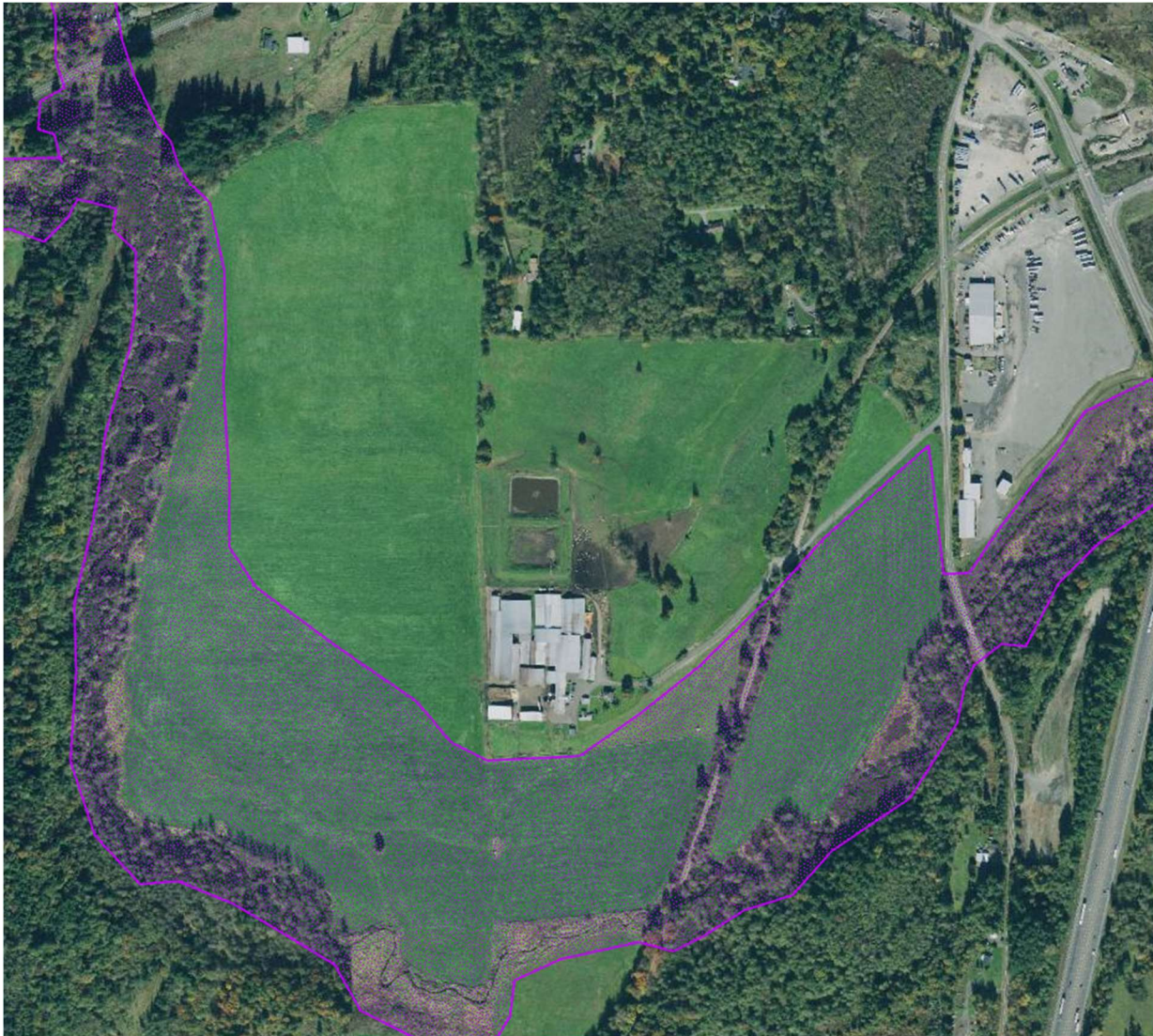


Figure 1: Purple polygon indicates Designated Federal Critical Habitat for Oregon Spotted Frog



February 15, 2022

Thurston County Commissioners
 Thurston County Community Planning & Economic Development Department
 C/O Maya Teeple Senior Planner
 2000 Lakeridge Dr SW
 Olympia, WA 98502

Re: CPA-20 - Beaver Creek Site Specific Land Use Plan and Rezoning Amendment

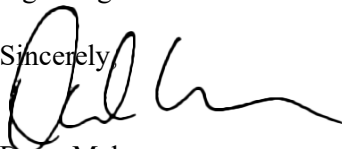
Thurston County Commissioners Mejia, Edwards, and Menser:

Thank you for the opportunity to comment on 2022-2023 Preliminary Comprehensive Plan and Development Code Dockets and specifically CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment.

- The Thurston County Chamber strongly recommends that the Planning Commission include the CPA-20 Beaver Creek - Site Specific Land Use and Rezoning Amendment on the official 2022-2023 docket.
- The Thurston County Chamber further recommends that the Beaver Creek Site Specific Land Use and Rezoning Amendment proceed as submitted in 2020 and reviewed in an independent fashion ahead of any future or proposed countywide study, review, and potential rezone of industrial lands undertaken by Thurston County.

The Proposed Beaver Creek amendment is a carryover item from previous official dockets. Current market and timing considerations make the applicant's request to amend the future land use plan and associated zoning of the properties from Rural Residential Resource 1 Unit per 5 acres (RRR 1/5) to Rural Resource Industrial (RRI) timely and appropriate. The site is a unique parcel of land located less than one mile from Interstate 5 with an active rail line running through the property. It is the assumed presence, and assumed continued presence, of the rail line that suggests that this amendment proceed ahead of any future countywide study of industrial lands.

Again, thank you for the opportunity to provide comments on the 2022-2023 Preliminary Comprehensive Plan Docket and the CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment. Please feel free to contact us at (360) 357-3362 or emailing DSchaffert@thurstonchamber.com if you have questions regarding our comments.

Sincerely,


Doug Mah
 Director, Public Policy Division

Cc: David Schaffert, President and CEO

From: [Bonnie Blessing](#)
To: [Maya Teeple](#)
Subject: Beaver Creek rezone
Date: Tuesday, February 15, 2022 5:24:49 PM

If the Beaver Creek area is rezone or an industrial complex is approved, can you ask the project proponent to:

- 1) do a habitat assessment for the property
- 2) ascertain historical water level fluctuations and how any development would alter that water level fluctuation
- 3) distribution of oregon spotted frog breeding habitat and overwintering and dispersal habitat
- 4) Ensure proper planning to adequately protect oregon spotted frogs

This may entail several years so best for hte project proponent to get started on it.

From: [Bonnie Blessing](#)
To: [Maya Teeple](#)
Subject: comment on rezone 93 and Hwy 99
Date: Wednesday, February 16, 2022 9:41:08 AM

Hi Maya;

I understand there is a proposal to rezone the corner of 93rd ave sw and highway 99. To light industrial. The proposed rezone would generate land use inconsistent forest use of the adjoining land.

Bonnie Blessing-Earle
6123 Northhill Drive SW Olympia WA 98512

From: [NINA CARTER](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Wednesday, February 16, 2022 10:46:40 AM

Name: NINA CARTER

Email: raincart@comcast.net

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, (New) Countywide Study of Industrial Lands, CPA-19 UP Castle LLC: Site Specific Land Use and Rezoning Amendment, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (New) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment

Message: February 16, 2022

Dear Board of Thurston County Commissioners (BoCC),

Thank you for providing the opportunity to comment on proposed changes to our Thurston County Comprehensive Plan. I recently retired from serving for over ten years on the Washington State Growth Management Hearing Board (GMHB) and thus have experience in analyzing Comprehensive Plans throughout Washington State. I've also lived in Thurston County for 43 years and I am interested in how our County prospers but also sustains ecological services to preserve our farm and forest lands, water resources, and air quality. In keeping with the spirit of the Growth Management Act, I congratulate you on encouraging public involvement in this process as stated the goals of this Act (RCW 36.70A.020).

Per your request, this is a quick summary of my opinion about the proposed amendments:

- PRO -- CPA-16 Community Driven Review of Agricultural Policies and Programs
- PRO -- County Wide Study of Industrial Lands
- CON -- Black Lake Quarry
- CON -- CPA-19 UP Castle
- CON -- CPA-20 Beaver Creek Dairy

I have worked with others in Thurston County concerned about these amendments and below are details of my concerns.

PRO:

- Please add CPA-16 Community Driven Review of Agricultural Policies and Programs to the BoCC's Agricultural Advisory Committee's work plan. The Committee started to review these policies in 2019 as a mitigation strategy for farmers who want to sell their land for development. The Committee should continue this important work to give the BoCC and farmers options and opportunities to preserve our fast-dwindling farmlands.
- Place a high priority on completing the County Wide Study of Industrial Lands. Converting farmland to industrial uses should be carefully reviewed against the criteria cited in several cases decided by the Courts and the GMHB. (See cases from Clark and Lewis Counties) Some farmlands, which are now on your preliminary docket, have "agricultural land of long-term commercial significance" (ALLTCS). Before converting these farmlands to industrial uses, I urge you to complete the County Wide Study of Industrial Lands.

CON:

- Black Lake Quarry proposal should be deleted from further consideration as a site-specific land use and rezoning to RRI. Allowing the amendment to TCC 20.29 will permit former mined lands to be zoned RRI which will let industrial uses on a road that is already overfilled with residential traffic. Black Lake Boulevard is not a major arterial designed to accommodate trucks and industrial traffic. Plus, the site is 3.5 miles from I-5. Trucking traffic will need to negotiate an already clogged interchange from I-5 to Hwy. 101 and then to the industrial site. What provisions will this amendment make for increased industrial traffic congestion in a largely residential area? What are the costs to the County's taxpayers for traffic improvements should this site become RRI? Black Lake Quarry should be returned to the underlying zoning consistent with the surrounding area before the mine was constructed. It should become RRR 1-20 or -5 like nearby properties.

DELETE OR DELAY:

- CPA-19 UP Castle – This is farmland including some of the best quality farmland that should not be rezoned to RRI. The proposed code change would not only allow RRI on this property but would open the door to more rural Thurston County land request a rezone to RRI. And again, as I mentioned above, completing the County Wide Study of Industrial Lands will give you more information about whether this parcel should be converted from farmland to industrial uses.
- CPA-20 Beaver Creek Dairy – As the WDFW has stated in their written comments, this is an environmentally important area where well managed farming can co-exist with threatened species. Covering the land with warehouses would threaten habitat for important wildlife. A portion of this farm has water rights that should not be lost from agricultural use. My same comment about completing the County Wide Study of Industrial Lands also applies to this situation.

Thank you for your consideration. I look forward to following your decisions about how Thurston County will function into an uncertain future. Careful consideration now of long-term impacts of your decisions will hopefully sustain our economy, ecosystems, and families into the next 50 or 100 years.

Sincerely,

Nina Carter
1128 Canning Court SW
Olympia, Washington
98512
raincart@comcast.net
360-789-0792

Time: February 16, 2022 at 6:46 pm

IP Address: 67.183.205.27

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

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Thurston
Economic
Development
Council



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Jessica Jensen
Jensen Milner | Cap City Law PS

Dan Jones
NorthAmericaTalk

Malcolm Miller
Deputy Mayor, City of Lacey

Evan Parker
Kidder Mathews

Perry Shea
SCJ Alliance

Dr. Timothy Stokes
South Puget Sound
Community College

February 16, 2022

Thurston County Community Planning & Economic Development

Attn: Maya Teeple, Senior Planner

2000 Lakeridge Dr. SW, Bldg. 1

Olympia, WA 98502

DELIVERED VIA EMAIL: Maya.Teeple@co.thurston.wa.us

RE: Thurston County Docketing

Dear Maya Teeple,

Thank you for the opportunity to provide comment for consideration by the Thurston County Board of Commissioners on the 2022-23 Preliminary Development Code and Preliminary Comprehensive Plan Amendment Dockets. This letter is in support of citizen's Initiated Amendment request – and is referenced within the official docket item briefing sheet as:

- Applicant: Beaver Creek Site Specific Map Land Use Plan and Rezoning Amendment
- Request: Site Specific Land Use and Rezone Amendment - amend the future land use plan and associated zoning of the properties from Rural Residential Resource 1 Unit per 5 acres (RRR 1/5) to Rural Resources Industrial (RRI).
- Project number: 2020105505

Our support of this proposal is in consideration of the region's employment and economic development capacity that are necessary for a resilient community and region. The site resides adjacent to critical infrastructure such as the rail line, interstate 5 – all key and critical components for supporting and attracting appropriate economic development activities and employment operations. The site has operated as a dairy farm and has reached its conclusion as a viable operation.

Thank you for your consideration on this proposal. Please do not hesitate to contact me should you have any questions and concerns.


Sincerely,

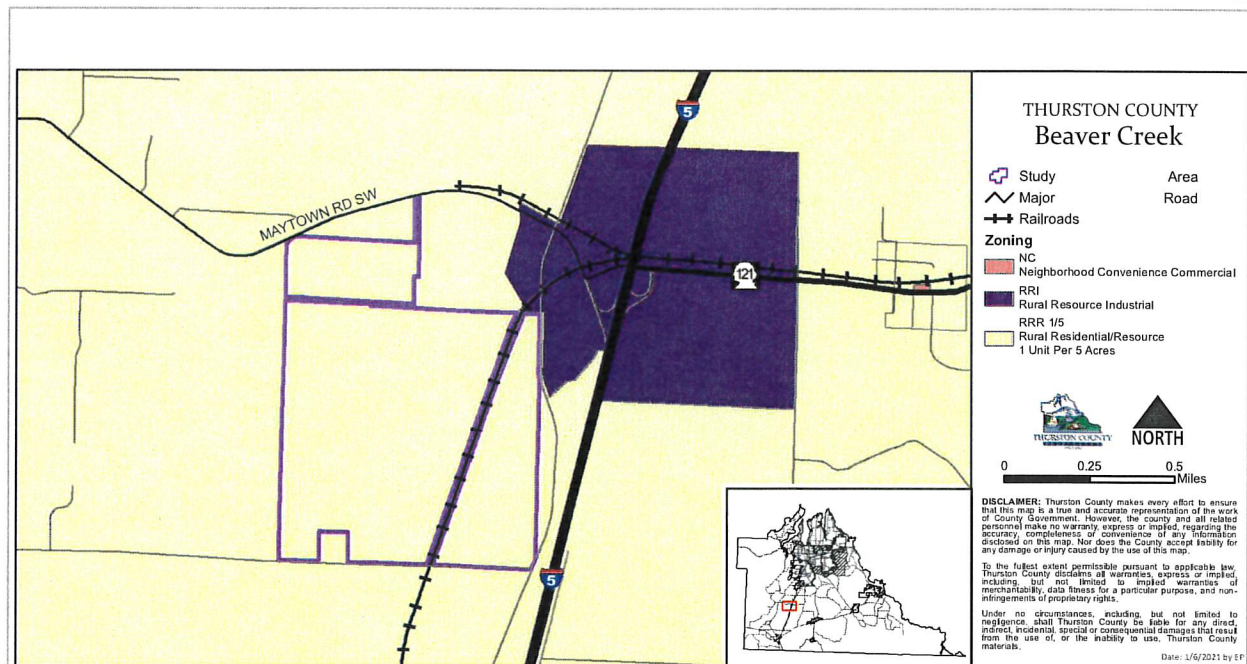
Michael Cade

Executive Director

Last Updated: Jan 3, 2022

PRELIMINARY DOCKET ITEM BRIEFING SHEET

Applicant	HW Seattle (Bill Webster), Chris Doelman
Request	This is a citizen-requested amendment to the Future Land Use Map (Map L-1) of the Comprehensive Plan and associated zoning. The applicant requests to amend the future land use plan and associated zoning of the properties from Rural Residential Resource 1 Unit per 5 acres (RRR 1/5) to Rural Resource Industrial (RRI). Application is available online by searching project number 2020105505 at: https://weblink.co.thurston.wa.us/DSPublic/customsearch.aspx?searchname=search 
Location	13333 Case Rd SW, Olympia WA 98512
APN	12606410300, 12607110000, 12607110100, 12607120000, 12607130000, 12607130100, 12607410000, 12607420100, 12608220000, 12608220200, 12608320000
Acres	389.12 +/-
Date received	November 12, 2020
Previous BoCC Action	This item was added to the docket in 2021 and was prioritized as last of citizen-initiated proposals.
Key stakeholders	Applicant, Beaver Creek Farm, Adjacent Landowners, Thurston County Citizens, Agricultural Stakeholders



Check all that apply:

Type of Request

- ☒ Comprehensive Plan Amendment
☒ Map ☐ Text
☐ Development Code Amendment
☐ Legally Required

Who Initiated Request:

- ☒ Citizen-Initiated
☐ City-Initiated
☐ Board-Initiated
☐ Staff-Initiated

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Community College

February 16, 2022

Thurston County Community Planning & Economic Development

Attn: Maya Teeple, Senior Planner

2000 Lakeridge Dr. SW, Bldg. 1

Olympia, WA 98502

DELIVERED VIA EMAIL: Maya.Teeple@co.thurston.wa.us

RE: Thurston County Docketing

Dear Maya Teeple,

Thank you for the opportunity to provide comment for consideration by the Thurston County Board of Commissioners on the 2022-23 Preliminary Development Code and Preliminary Comprehensive Plan Amendment Dockets. This letter is in support of applicant's request – and is referenced within the official docket item briefing sheet as:

- Applicant: BAR Holdings
- Request: Site Specific Land Use and Rezone Amendment - Amend and expand the Tumwater Urban Growth Area to include three parcels and concurrently rezone form Rural Residential Resource 1/5 (RRR 1/5) to Light Industrial to Light Industrial (LI).
- Project number: 2021206123

We are in support of this project and seek the County's favorable consideration to move the proposal.

Our support of this project is based upon the long stated goals of the comprehensive planning process and ultimately the plan, is to ensure that our communities are livable and have attributes that provide a sustainable and quality community. This area, adjacent to residential growth, will accommodate retail, office and employment opportunities that will support the south County as well as the adjacent residential population of Tumwater.

Thank you for your consideration and positive disposition of moving the applicant forward to full review.

As you know, the goals of the comprehensive plan are to create livable communities where walkability is key. The need for retail and commercial services to support the large number of new residences in this area is evident. Not only is there a need to serve the new residents but there is also a need to serve existing residents in South County and East Olympia that travel through this intersection daily.

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Our application is requesting this parcel along with several others adjoin this parcel to be brought in to the UGA with an LI designation. We chose LI in that it gives the greatest amount of flexibility for office, retail and light industrial. The next step in this process will allow for the area to be planned consistently with the region's needs for employment, and commercial and retail supportive activities.

Thank you for your consideration. Please do not hesitate to contact me should you have any questions on our support of this proposal.

Sincerely,

Michael Cade
Executive Director

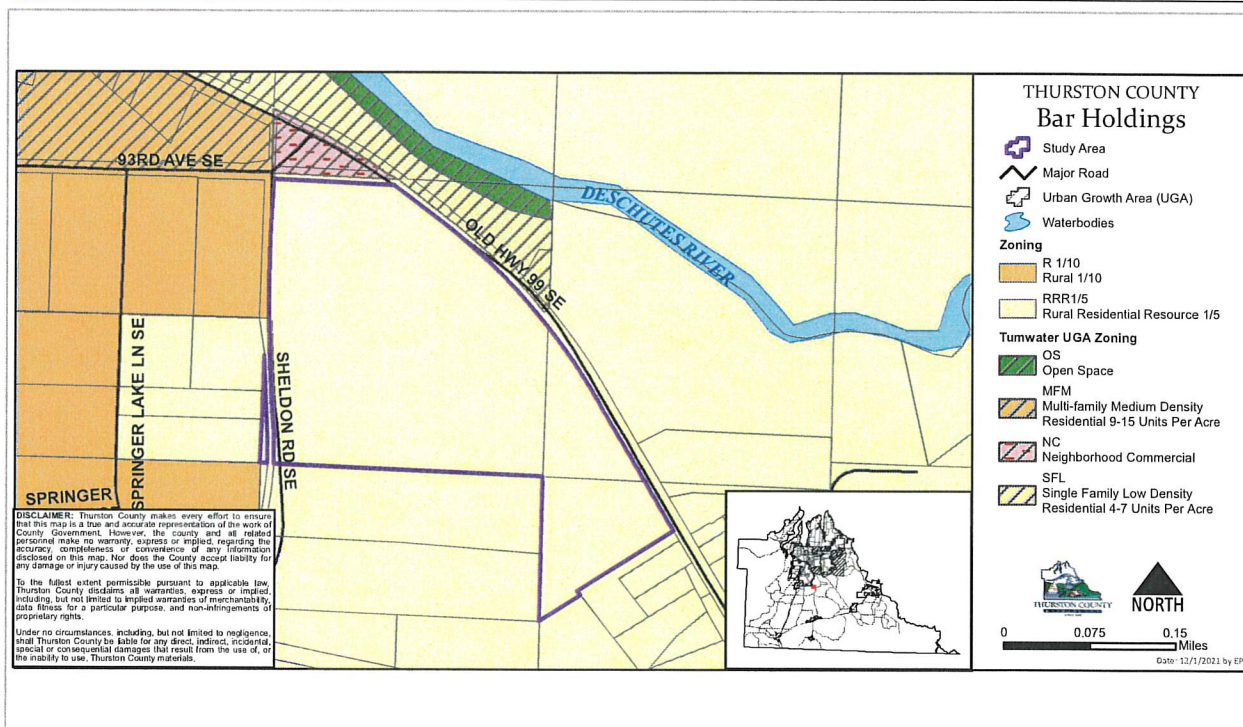
New Proposal

BAR Holdings: Site Specific Land Use Amendment and Associated Rezone

Last Updated: Jan 3, 2022

OFFICIAL DOCKET ITEM BRIEFING SHEET

Applicant	BAR Holdings
Request	Amend and expand the Tumwater Urban Growth Area to include three parcels and concurrently rezone from Rural Residential Resource 1/5 (RRR 1/5) to Light Industrial (LI).
	Application is available online by searching project number 2021106123 at: https://weblink.co.thurston.wa.us/DSPublic/customsearch.aspx?searchname=search
Location	9601 and 9445 Old Hwy 99 SE
APN	11719220101, 11719210100, 11719240302
Acres	42.5± acres
Date received	November 12, 2021
Previous BoCC Action	None - new proposal
Key stakeholders	Thurston County Citizens, Industry, Environment, Realtors, City of Tumwater



Check all that apply:

Type of Request

- ☒ Comprehensive Plan Amendment
☒ Map ☒ Text
☐ Development Code Amendment
☐ Legally Required

Who Initiated Request:

- ☒ Citizen-Initiated
☐ City-Initiated
☐ Board-Initiated
☐ Staff-Initiated

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February 16, 2022

Thurston County Community Planning & Economic Development

Attn: Maya Teeple, Senior Planner

2000 Lakeridge Dr. SW, Bldg. 1

Olympia, WA 98502

DELIVERED VIA EMAIL: Maya.Teeple@co.thurston.wa.us

RE: Thurston County Docketing

Dear Maya Teeple,

Thank you for the opportunity to provide comment for consideration by the Thurston County Board of Commissioners on the 2022-23 Preliminary Development Code and Preliminary Comprehensive Plan Amendment Dockets.

The applicant, Black Lake Quarry is seeking to amend future land use and associated zoning of four parcels from Rural Residential to Rural Resource Industrial.

- Applicant: Black Lake Quarry
- Request: Site Specific Land Use and Rezone Amendments

We are in support of this request and application. This is based upon our long history of working with the proponent on the site; their use and control of the site and the long range positive impacts that this action would have upon our region's economy.

- It would potentially provide Thurston County with the opportunity to locate employment bearing activities within the residential environment of the region.
- It would potentially represent an alleviation of pressure of land conversions elsewhere in the county.
- It is located a short distance from Interstate 5 and the infrastructure that supports employment activities.
- There are very few locations in Thurston County where large industrial buildings can be placed.

Thank you for your positive consideration of this request. Please do not hesitate to contact me if you have any questions about these comments.

Sincerely,

Michael Cade
Executive Director

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February 16, 2022

Thurston County Community Planning & Economic Development

Attn: Maya Teeple, Senior Planner

2000 Lakeridge Dr. SW, Bldg. 1

Olympia, WA 98502

DELIVERED VIA EMAIL: Maya.Teeple@co.thurston.wa.us

RE: Thurston County Docketing

Dear Maya Teeple,

Thank you for the opportunity to provide comment for consideration by the Thurston County Board of Commissioners on the 2022-23 Preliminary Development Code and Preliminary Comprehensive Plan Amendment Dockets.

We are asking that the Board of Commissioners give a high priority to finishing the **Docket Item 7a Grand Mound Subarea Plan Update** which project has been in the works for several years. Our areas of concern and consideration include but not limited to:

- It's an unincorporated UGA that is the County's key opportunity to support economic growth (capital investment, jobs, tax revenues for the county) – more specifically within the South County which represents a unique economic development asset for Thurston County.
- The Rochester Subarea Plan (covering an adjacent area) was recently completed and this would finish the other half of the planning updates needed in south county.
- This process would allow for consistency in the area's land uses – more specifically lands that are designated as mineral extraction and would eliminate the split zoning of an active sand and gravel operation and would bring land into the UGA consistent with other mining areas in Grand Mound that are in the UGA and zoned for industrial development.
- Industrial development that could occur in the area would provide significant employment opportunities to the emerging and growing population of south County.

Thank you for your consideration and action on this item. Please do not hesitate to contact me if you have any further concerns.

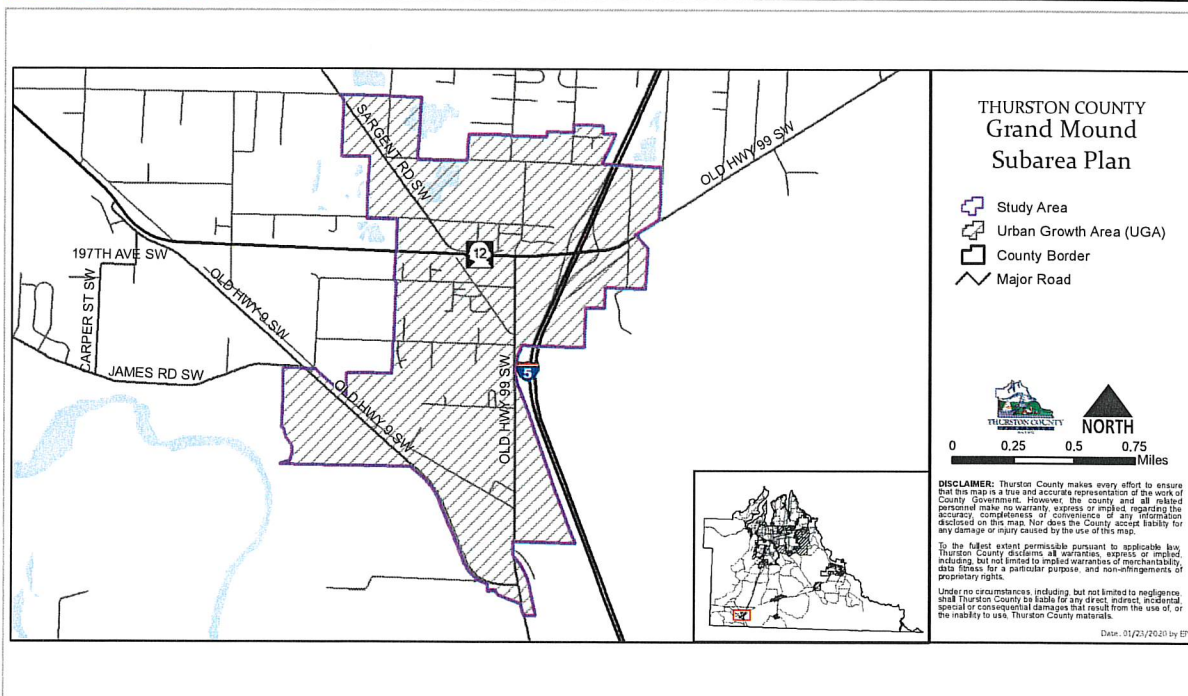
Sincerely,

Michael Cade
Executive Director

Last Updated: Jan 3, 2022

OFFICIAL DOCKET ITEM BRIEFING SHEET

Applicant	BoCC
Request	Review, update and amend the Grand Mound Subarea Plan for consistency with current market trends in the planning area, update for consistency with the recommendations from the transportation study. Consider 7 citizen-initiated land use amendments - some for properties inside the UGA (Steelhammer Family Trust, Fire District #14 and Morgan), and some for UGA-adjacent properties (Black Lake Quarry, Wilmovsky and Deskin, Jackson/Dragt). Of 7 land use amendments, 3 include requests to amend Grand Mound UGA. Review and amend minimum lot width standards in TCC 20.15.060. Review and update Grand Mound Design Guidelines.
Location	Grand Mound UGA
APN	Grand Mound UGA
Acres	982 ± acres
Date received	2007
Previous BoCC Action	Placed on the Official Docket in 2017. Prior to being docketed in 2017, this item was on the preliminary docket from 2008 onward. In April 2020 the Board prioritized this item as 3rd out of 7 Board-initiated comp plan amendments.
Key stakeholders	Grand Mound UGA residents and businesses, Chehalis Tribe, Department of Corrections, TC citizens



Check all that apply:

Type of Request

- ☒ Comprehensive Plan Amendment
- ☒ Map ☒ Text
- ☐ Development Code Amendment
- ☐ Legally Required

Who Initiated Request:

- ☐ Citizen-Initiated
- ☐ City-Initiated
- ☒ Board-Initiated
- ☐ Staff-Initiated

From: [ELIZABETH A DEWREEDE](#)
To: [Maya Teeple](#)
Subject: Incoming Comp Plan OR Dev Code Comment
Date: Wednesday, February 16, 2022 12:44:31 PM

Name: ELIZABETH A DEWREEDE

Email: betsie54@gmail.com

Select the Preliminary Docket Item(s) you are Commenting On: CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-6 Nisqually Subarea Plan Update, CPA-7a Grand Mound Subarea Plan Update, (New) Countywide Study of Industrial Lands, A-8 Habitat Conservation Plan Implementation Ordinance, A-25 Forest Lands Conversion Ordinance & Rural Tree Protection Standards, A-26 Transfer & Purchase of Development Rights Programs

Message: My highest priorities are:

-CPA-16 - Please add to this work the BoCC's Agricultural Advisory Committee's idea for a mitigation strategy when landowners sell farms for development.

-County Wide study of Industrial lands. In some cases, the land that could be converted is National Significant Agricultural Land that has the soils and other qualities making it the land we should be relying on in the future for food production, not as industrial sites.

Please include discussion of ag lands in CPA-6 Nisqually Subarea Plan to be updated as about 1/3 of the acres are in ag, predominantly designated ag land.

Include discussion of nearby agricultural lands to CPA-7a Grand Mound Subarea Plan. I am a retired farmer who lives in this area. The largest block of Nationally Significant Agricultural Land in the county lies directly south and southwest of Grand Mound. Most of that land is designated as Long-Term Ag land. Additional undesignated farmland exists immediately west and east of portions of Grand Mound. In some manner the Subarea Plan should identify how this commercial and more densely populated area does or can provide services to this larger agriculture community. It should also indicate how land use in the Subarea will not conflict with this nearby vital natural resource industry.

Place a moderate priority on A-26 TDR and PDR. These programs exist to preserve farmland without funding for staff support and for the purchase of development rights other farmland preservation strategies deserve higher consideration.

I do not support these docket items as they do not support ag in Thurston County. They should be delayed until the next cycle:

CPA-5 Upcastle

CPA-20 Beaver Creek Dairy

Black Lake Quarry

Time: February 16, 2022 at 8:44 pm

IP Address: 97.113.8.37

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-docket-proposals/>

Sue Danver
7106 Foothill Loop SW
Olympia, WA 98512
February 16, 2022

Thurston County Board of County Commissioners
via email maya.teeple@co.thurston.wa.us Senior Planner

RE: Comment on 2022-2023 Preliminary Thurston County Docket

Dear Commissioners Meija, Edwards and Menser:

For over twenty years, I have commented countless times to the BoCC and Planning Commission. I believe this docket decision is one of the most consequential the board has had in the twenty years.

I have been an advocate for wildlife habitat, recreational opportunities, open space, protecting our drinking water aquifer, and maintaining adequate stream flows to encourage healthy ecosystems for people and wildlife.

We now find ourselves in an unpredictable world. Especially with climate change, managing our natural resources to buffer weather extremes seems a prudent path. Allowing extensive impervious surfaces and heavy traffic next to farmland, rural homes, and County, State, and Federal lands, conserved for their unique habitat and wildlife and recreation potential, would be unwise.

I encourage you to place a high priority on the County Wide Study of Industrial Lands.

- **Delay** until the next cycle consideration of the following industrial related proposals: **CPA-5 UP Castle and CPA-20 Beaver Creek Dairy.** To make decisions on these proposals before the industrial lands study is completed would signal support for piecemeal land use planning.

The Planning Commission (PC) made decisions on both these applications in 2021. The BoCC postponed a decision on CPA-20 Beaver Creek Dairy until 2022. The Planning Commission denied CPA-5 UP Castle. Up Castle needs to complete an EIS before the BoCC can make a decision.

Hundreds of opposing comments for each project were submitted by Thurston County citizens as part of the Planning Commission process. The Beaver Creek Dairy PC hearing exposed the numerous environmental problems that many industrial applications would encounter when done individually. The Up Castle PC hearing underscored the difficulties of piecemealing. Essentially, it would be complicated and a time sink for staff to determine how a code for one rural parcel would apply to all parcels..

These two 2021 experiences demonstrate why it is critical to conduct a County Wide Study of Industrial Lands. **The Study should comprehensively address when where,**

for what purposes industrial land uses should be allowed in rural Thurston County. A comprehensive study would unify the criteria for all future projects and encourage the discussion and consensus of an overall desired outcome.

- **The Black Lake Quarry proposal should be deleted from further consideration as a site specific land use and rezoning to RRI.** The proposed code amendment to TCC 20.29 permitting RRI land use on former the Black Lake Quarry mined lands, a significant distance from I-5 and not on a major arterial road, would apply not only to this specific site but to an unknown number of mined areas in the county.

Designated mineral resource lands exist throughout much of the county. As any current or future mine closed. The Black Lake Quarry code change would result in those sites also being rezoned to RRI. **Converting mined lands out of their underlying RRR 1/5 zoning was never the intention of those who worked on the mineral lands designation policy and related codes.**

Also, please place a high priority on **CPA-16 Community Driven Review of Agricultural Policies and Programs** for all the good reasons provided by comments of farm advocates. I love my CSA.

Thank you for considering my comments.

Sincerely,

Sue Danver

From: [Rebeca Potasnik](#)
To: [Maya Teeple](#)
Subject: Preliminary Comprehensive Plan & Development Code Dockets
Date: Wednesday, February 16, 2022 3:29:59 PM

Hello Maya Teeple,

As you work to finalize the 2022-2023 docket, please prioritize those items that will affect and could support agriculture and farmland preservation in Thurston County.

- CPA-16 Community Driven Review of Agricultural Policies and Programs
- County Wide Study of Industrial Lands
- CPA-6 Nisqually Subarea Plan
- CPA-7a Grand Mound Subarea Plan
- CPA-1 Joint Plans with Olympia and Lacey
- A-8 HCP implementation
- A-26 TDR and PDR
- A-25 amend forest land conservation code

I also ask that you place high priority on the County Wide Study of Industrial Lands and solidify comprehensive policies related to industrial land uses in Thurston County *before* the following industrial related proposals are added to the docket, even if that means removing them from the 2022-2023 docket.

- CPA-5 UP Castle
- CPA-20 Beaver Creek Dairy, Black Lake Quarry, and Bar Holdings

Thank you for your consideration.

Rebeca

Rebeca Potasnik
360.977.0476
rebeca.potasnik@gmail.com

From: [Holly Gadbaw](#)
To: [Maya Teeple](#); [Travis Burns](#); [County Commissioners](#)
Subject: Comments on Thurston County's docket of proposed Comp Plan amendments
Date: Wednesday, February 16, 2022 4:53:31 PM
Attachments: [Futurewise Coms on Thurston Cty 2022-2023 Preliminary Comp Plan Docket Proposals Feb 16 2022.pdf](#)

Dear Maya, Travis and County Commissioners,

We are Board Members of Futurewise. I writing to let you know that we support the comments on your docket of proposed comprehensive plan amendments in the letter from Tim Trohimovich dated February 16, 2022.

Futurewise has been very active in participating in land use planning in Thurston County. There are citizens in Thurston County that belong to and support Futurewise's work.

Thank you for the opportunity to comment on the docket and for considering our comments,

Sincerely,
Holly Gadbaw
1625 Sylvester Street SW
Olympia, WA 98501

Janae Huber
2612 Buker Street SE
Olympia, WA 98501



816 Second Ave, Suite 200, Seattle, WA 98104
p. (206) 343-0681
futurewise.org

February 16, 2022

The Honorable Carolina Mejia
The Honorable Gary Edwards
The Honorable Tye Menser
Board of Commissioners for Thurston County
c/o Maya Teeple Senior Planner
Thurston County Community Planning and Economic Development Department
2000 Lakeridge Dr SW
Olympia, Washington 98502

Dear Commissioners Mejia, Edwards, and Menser:

Subject: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals CPA-16, CPA-19, and CPA-20

Send via email to: maya.teeple@co.thurston.wa.us; travis.burns@co.thurston.wa.us; county.commissioners@co.thurston.wa.us

Thank you for the opportunity to comment on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment Docket Proposals. Thurston County should complete CPA-16 in 2022 and should not further process or deny CPA-19 and CPA-20.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including Thurston County.

Complete the CPA-16 Community-Driven Review of Agricultural Policies and Programs and related Rural Element Amendments in 2022.

Originally, Thurston County agreed to update the agricultural lands of long-term commercial significance designations to incorporate all of the prime farmland soils by the last comprehensive plan update deadline which was June 30, 2016, for Thurston County. The periodic update was not adopted until November 12, 2019, and did not update the designations of agricultural lands of long-term commercial significance to include all of the prime farmland soils.

Futurewise timely appealed the County's failure to update its designations of agricultural lands of long-commercial significance and related provisions. For almost two years the County has been working to update the designations and related policies and programs under a series of settlement



Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
Docket Proposals

February 16, 2022

Page 2

negotiation time extensions.¹ Futurewise recognizes that this work can take time and that the County has limited resources, as we all do. The County's schedules for updating the designations of agricultural lands of long-term commercial significance had the work concluding with a Board of County Commissioner's decision in December 2022.² So Futurewise was very concerned to hear that the decision would not be completed until a year later, December 2023.³

Futurewise is particularly concerned by this schedule slippage because the County continues to process permits and even comprehensive plan amendments and rezones for land that may qualify as agricultural lands of long-term commercial significance. Some of the comprehensive plan amendments are clearly illegal, but the County continues to process them. The work that went into one of these violations of the Growth Management Act, Docket CPA-19, could have significantly advanced the work of bringing the County's agricultural policies and regulations into compliance with the Growth Management Act. We have the same concerns with Preliminary Comprehensive Plan Amendment Docket Proposal CPA-20.

Thurston County Code Section 2.05.020(B)(8) authorizes the County to amend the official docket. We urge the County to stop further processing of the amendments that violate the Growth Management Act and to amend the docket to remove these amendments. The staff resources that would have been used for the illegal amendments should be devoted to completing CPA-16 in 2022. This will advance the County's interest in conserving its working farms in addition to complying with state law.

Docket CPA-19, Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20 Chapter 20.29, violates the Growth Management Act (GMA) because it consists of urban growth and does not qualify as a Type I, Type II, or Type III LAMIRD. Docket CPA-20 should not be further processed.

CPA-19, should not be processed further because it violates the GMA by allowing urban growth in rural areas. The applicant is proposing to use the site for warehousing and manufacturing.⁴

The Washington State Supreme Court has concluded that:

¶ 5 LAMIRDs are not intended for continued use as a planning device, rather, they are “intended to be a one-time recognition of existing areas and uses and are not

¹ *Futurewise v. Thurston County*, WWRGMHB Case No. 20-2-0001, Order on Dismissal of Issue No. 3 and Settlement Extension for Issue Nos. 1 and 2 (Feb. 24, 2020).

² See for example Thurston County's Status Report and Motion For 90-Day Extension (Nov. 2, 2021) Appendix 1 p. 2 of 2.

³ Thurston County's Status Report and Motion For 90-Day Extension (Jan. 31, 2022) Appendix 1 p. 2 of 2.

⁴ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report p. 1 last accessed on Feb. 15, 2022, at: <https://www.thurstoncountywa.gov/planning/planningdocuments/CP-19%20-%20PC%20Staff%20Memo%20-%20Up%20Castle.pdf>.

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 3

intended to be used continuously to meet needs (real or perceived) for additional commercial and industrial lands.” *People for a Liveable Cmty. v. Jefferson County*, No. 03–2–0009c, 2003 GMHB LEXIS 34, at *2 (W. Wash. Growth Mgmt. Hr’gs Bd. Final Dec. and Order Aug. 22, 2003). (In general, planning in rural zones must “protect the rural character of the area” and “contain[] or otherwise control[] rural development.” RCW 36.70A.070(5)(c), (i)).⁵

For these reasons the Growth Management Act contains specific standards that limited areas of more intense rural development (LAMIRDs) must meet.

The Growth Management Act also prohibits urban growth in rural areas.⁶ The proposed CPA-19 comprehensive plan amendment, rezone, and code amendments all apply to the rural area.⁷ RCW 36.70A.030(28) defines “urban growth” as

growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170. A pattern of more intensive rural development, as provided in RCW 36.70A.070(5)(d), is not urban growth.

Warehouses qualify as urban growth because they cover most or even all of a lot with large buildings and impervious surfaces such as paving.⁸ Therefore they are “incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands” There is simply not enough open land left to farm where warehouses are constructed. So, warehouses qualify as “urban growth” and are prohibited in rural areas.⁹

The definition of urban growth in RCW 36.70A.030(28) provides that more intense rural developments allowed by RCW 36.70A.070(5)(d) are not urban growth. However, Docket CPA-19 and the Up Castle Code Amendment Chapter 20.29 do not meet the requirements in RCW 36.70A.070(5)(d).

⁵ *Gold Star Resorts, Inc. v. Futurewise*, 167 Wn.2d 723, 727–28, 222 P.3d 791, 793 (2009).

⁶ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

⁷ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report pp. 1 – 2 & pp. 4 – 6.

⁸ See the aerial image from the Thurston County Property Map for Parcel 44160000300 and the “Basic Info,” “Structures,” and “Land” tabs in the file “44160000300 Aerial & Data.pdf” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

⁹ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 4

The Growth Management Hearings Board, a state agency charged with interpreting the Growth Management Act, held:

Therefore, when the Board reviewed how the LAMIRDs were defined and the uses allowed in them it found contradictions and violations of the GMA. For example, as for Type I LAMIRDs, the GMA provides: “Any development or redevelopment in terms of building size, scale, use, or intensity shall be consistent with the character of the existing areas.”¹⁸⁴ An “existing area” or “existing use” is one that was in existence on July 1, 1990.¹⁸⁵ The fundamental problem of the County’s approach is that its development regulations fail to limit LAMIRDs in the manner required by the GMA. Rather than determining the size, scale, use and intensity of uses that existed in a particular area to be designated as a LAMIRD, and limiting future development in the LAMIRD on that basis, the County instead allows uses in a particular LAMIRD based on the zoning designation applied to a LAMIRD, regardless of whether those uses were present in that LAMIRD on July 1, 1990.

¹⁸⁴ RCW 36.70A.070(5)(d)(i)(C) [& RCW 36.70A.070(5)(d)(v)].

¹⁸⁵ RCW 36.70A.070(5)(d)(v)(A).¹⁰

The 1990 aerial image from Google Earth shows that that 5641 and 5505 222nd Avenue SW were actively used as a farm.¹¹ So 5641 and 5505 222nd Avenue SW, the location of CPA-19, do not qualify as a Type I LAMIRD under RCW 36.70A.070(5)(d)(i) since there was no existing area and no existing warehouse, industrial, or manufacturing uses in 1990.

The proposal does not involve any small-scale recreational or tourist uses.¹² So it does not qualify as a Type II LAMIRD under RCW 36.70A.070(5)(d)(ii).

RCW 36.70A.070(5)(d)(iii) provides in relevant part that Type III LAMIRDs are:

(iii) The intensification of development on lots containing isolated nonresidential uses or new development of isolated cottage industries and isolated small-scale businesses that are not principally designed to serve the existing and projected rural population and nonresidential uses, but do provide job opportunities for rural residents. Rural counties may allow the expansion of small-scale businesses as long as

¹⁰ *Futurewise, Governors Point Development Company, Triple R. Residential Construction, Inc. and the Sablin Family, Eric Hirst, Laura Leigh Brakke, Wendy Harris and David Stalheim, and City of Bellingham v. Whatcom County*, Western Washington Region Growth Management Hearings Board (WWRGMHB) Case No. 11-2-0010c, Final Decision and Order & WWRGMHB Case No. 05-2-0013, Order Following Remand on Issue of LAMIRDs (Jan. 9, 2012), at 92 of 177.

¹¹ 5641 and 5505 222nd Avenue SW 1990 Aerial Image in the files “5505 222nd Ave SW 1990.pdf” and “Aerial Image 5505 222nd Ave SW 1990 Aerial Image.png” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹² Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report pp. 1 – 12.

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
Docket Proposals

February 16, 2022

Page 5

those small-scale businesses conform with the rural character of the area as defined by the local government according to RCW 36.70A.030(23). Rural counties may also allow new small-scale businesses to utilize a site previously occupied by an existing business as long as the new small-scale business conforms to the rural character of the area as defined by the local government according to RCW 36.70A.030(23).

The Growth Management Hearings Board has concluded that “[a]n isolated use, then, must be one that is set apart from others. The Legislature’s use of the term ‘isolated’ for both cottage industry and small-scale businesses demonstrates an unambiguous intention to ensure that any commercial uses established by the mechanism of a type (d)(iii) LAMIRD be set apart from other such uses.”¹³ But 5641 and 5505 222nd Avenue SW are not set apart from other such uses, they are immediately adjacent to several large warehouses and industrial facilities.¹⁴ Nor is 5641 and 5505 222nd Avenue SW the site of a previously existing non-farm business.¹⁵ So the comprehensive plan amendment and rezone in Docket CPA-19 violates RCW 36.70A.070(5)(d)(iii). So, CPA-19 should not be processed further.

Docket CPA-19’s zoning text amendment to Chapter 20.29 also violates RCW 36.70A.070(5)(d)(iii). That amendment requires the opposite of what RCW 36.70A.070(5)(d)(iii) requires. Instead of requiring the uses to be isolated as RCW 36.70A.070(5)(d)(iii) does, the text amendment provides that the Rural Resource Industrial District (RRI) may be “adjacent to an existing industrial development utilizing existing county roads”¹⁶ This change very clearly violates RCW 36.70A.070(5)(d)(iii). The County must stop processing amendment CPA-19.

¹³ *Better Brinnon Coalition v. Jefferson County*, Western Washington Growth Management Hearings Board (WWGMHB) Case No. 03-2-0007 Compliance Order (June 23, 2004), at *7 of 14, 2004 WL 1864628 at *4; *James A. Whitaker v. Grant County*, Eastern Washington Growth Management Hearings Board (EWGMHB) Case No. 99-1-0019 Second Order on Compliance (Nov. 1, 2004), at *6, 2004 WL 2624887 at *4 quoting *Better Brinnon Coalition*.

¹⁴ See the Google Earth Aerial Image of 5505 222nd Ave SW with the filename “5505 222nd Ave SW and Adjoining Warehouses.pdf” enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021). The author of this letter is an expert in interpreting aerial images for planning purposes.

¹⁵ *Id.*; 5641 and 5505 222nd Avenue SW 1990 Aerial Image in the files 5505 222nd Ave SW 1990.pdf and Aerial Image 5505 222nd Ave SW 1990 Aerial Image.png enclosed in a separate email with Futurewise’s letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹⁶ Comprehensive Plan Amendments: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment Staff Report Attachment B: Thurston County Zoning Ordinance (Title 20) p. *2.

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 6

Docket CPA-20, Beaver Creek: Site Specific Map Land Use Plan and Rezoning Amendment of approximately 390 acres from RRR 1/5 to RRI, violates the Growth Management Act (GMA) because it consists of urban growth and does not qualify as a Type I, Type II, or Type III LAMIRD. Docket CPA-20 should not be further processed.

Like CPA-19, CPA-20, should not be processed further because it violates the GMA by allowing urban growth in rural areas. CPA-20 proposes to “[c]onstruct 5 speculative warehouse-distribution buildings of approximately 2,960,000 [square feet] SF with associated access and drive aisle improvements.”¹⁷

Speculative warehouse-distribution buildings are urban growth. They qualify as urban growth because they cover most of a lot with large buildings and impervious surfaces such as paving.¹⁸ Therefore they are “incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands” There is simply not enough open land left to farm where warehouses are constructed. Therefore, warehouses qualify as “urban growth” and are prohibited in rural areas.¹⁹

The definition of urban growth in RCW 36.70A.030(28) provides that more intense rural developments allowed by RCW 36.70A.070(5)(d) is not urban growth. However, Docket CPA-20 does not meet the requirements in RCW 36.70A.070(5)(d).

The 1990 aerial image from Google Earth shows that that 13333 Case Rd SW, Olympia WA 98512 was actively used as a farm.²⁰ So 13333 Case Rd SW, Olympia WA 98512 does not qualify as a Type I LAMIRD under RCW 36.70A.070(5)(d)(i) since there was no existing area and no existing warehouse, industrial, or manufacturing uses on the land in 1990.

The proposal does not involve any small-scale recreational or tourist uses.²¹ So it does not qualify as a Type II LAMIRD under RCW 36.70A.070(5)(d)(ii).

¹⁷ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm) last accessed on Feb. 15, 2022, at

<https://weblink.co.thurston.wa.us/DSPublic/customsearch.aspx?searchname=search&dbid=0>.

¹⁸ See the aerial image from the Thurston County Property Map for Parcel 44160000300 and the “Basic Info,” “Structures,” and “Land” tabs in the file “44160000300 Aerial & Data.pdf” enclosed in a separate email with Futurewise letter to the Thurston County Planning Commission Comments on Comprehensive Plan Amendment: 2020-2021 Docket (CP-19) Up Castle Land Use & Rezone Amendment & Up Castle Code Amendment Chapter: Title 20, Chapter 20.29 (Oct. 5, 2021).

¹⁹ RCW 36.70A.070(5)(b), RCW 36.70A.110(1), & *Diehl v. Mason Cty.*, 94 Wn. App. 645, 655 – 57, 972 P.2d 543, 547 – 49 (1999).

²⁰ Aerial image (6/20/1990) of the CPA-20 vicinity enclosed in a separate email with the filename “CPA-20 1990 Aerial Image.pdf.”

²¹ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm).

Board of Commissioners for Thurston County
 RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment
 Docket Proposals
 February 16, 2022
 Page 7

RCW 36.70A.070(5)(d)(iii) provides in relevant part that Type III LAMIRDs are:

(iii) The intensification of development on lots containing isolated nonresidential uses or new development of isolated cottage industries and isolated small-scale businesses that are not principally designed to serve the existing and projected rural population and nonresidential uses, but do provide job opportunities for rural residents. Rural counties may allow the expansion of small-scale businesses as long as those small-scale businesses conform with the rural character of the area as defined by the local government according to RCW 36.70A.030(23). Rural counties may also allow new small-scale businesses to utilize a site previously occupied by an existing business as long as the new small-scale business conforms to the rural character of the area as defined by the local government according to RCW 36.70A.030(23).

The Growth Management Hearings Board has concluded that “[a]n isolated use, then, must be one that is set apart from others. The Legislature’s use of the term ‘isolated’ for both cottage industry and small-scale businesses demonstrates an unambiguous intention to ensure that any commercial uses established by the mechanism of a type (d)(iii) LAMIRD be set apart from other such uses.”²² But 13333 Case Rd SW is not set apart from other such uses, it is adjacent to Freightliner Northwest. Nor is 13333 Case Rd SW the site of a previously existing non-farm business.²³ Docket CPA-20 is not a small-scale business, it proposes the construction of “5 speculative warehouse-distribution buildings of approximately 2,960,000 SF with associated access and drive aisle improvements.”²⁴ So the comprehensive plan amendment and rezone in Docket CPA-20 violates RCW 36.70A.070(5)(d)(iii).

In sum, CPA-20 violates the Growth Management Act and cannot be allowed at this site. This amendment must not be further processed.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 or email: tim@futurewise.org.

²² *Better Brinnon Coalition v. Jefferson County*, Western Washington Growth Management Hearings Board (WWGMHB) Case No. 03-2-0007 Compliance Order (June 23, 2004), at *7 of 14, 2004 WL 1864628 at *4 & *James A. Whitaker v. Grant County*, Eastern Washington Growth Management Hearings Board (EWGMHB) Case No. 99-1-0019 Second Order on Compliance (Nov. 1, 2004), at *6, 2004 WL 2624887 at *4 quoting *Better Brinnon Coalition*.

²³ Aerial image (6/20/1990) of the CPA-20 vicinity enclosed in a separate email with the filename “CPA-20 1990 Aerial Image.pdf.”

²⁴ Presubmission Conference report Project #: 2021103470 Beaver Creek Farm, LLC p. 1 (Date & Time of Conference: 07/29/21, 2:00 pm).

Board of Commissioners for Thurston County

RE: Comments on the Thurston County 2022-2023 Preliminary Comprehensive Plan Amendment

Docket Proposals

February 16, 2022

Page 8

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'Tim Trohimovich', with a stylized, cursive script.

Tim Trohimovich, AICP, WSBA No. 22367

Director of Planning and Law

Enclosure (in a separate email)

Unique ID	Date	Name	Topic (Select All that Apply)	Summary of Comment
154	2/10/2023	Chris Doelman	CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment	Believes the site is idea for industrial development because of demand in the market, increase in rents, low vacancy, 4th highest growth rate and sustained growth over the past 10 years.
282	2/13/2023	Vince Cottone	CPA-16 Community Driven Review of Agricultural Policies and Programs CPA-8 Countywide Study of Industrial Lands CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment CPA-22 Bar Holdings: Site Specific Land Use and Rezoning Amendment (PRELIM) UP Castle LLC: Site Specific Land Use and Rezoning Amendment (NEW, PRELIM) UP Castle LLC: Site Specific Land Use and Rezoning Amendment A-25 Forest Lands Conversion Ordinance, Rural Tree Protection Standards CR-1 Natural Landmark Program	CPA-22: Opposes rezone as it violates the Growth Management Act and would impact properties and residents in the area. Also feel that intensive development is out of character with surroundings and that light industrial sites are already available. Concerned about increased traffic, loss of forest land, and historical tribal trail. CPA-20: Opposes in alignment with Futurewise in their 2022 comments. CPA-8: Supports study to identify best lands for industry and protect agriculture, forestry and habitat from development. Cr-1: Supports the concept and recognizes staffing and cost challenges. A-25 Supports creating incentives to discourage conversion and strengthen rural tree protections.
298	2/14/2023	Chad Kramer	CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment CPA-22 Bar Holdings: Site Specific Land Use and Rezoning Amendment (NEW, PRELIM) Port of Tacoma: Site Specific Land Use and Rezoning Amendment	CPA-22: opposes the proposal. Adjacent resident feels development would end the stewardship goals they have invested in on their land and ultimately would sell their property causing a domino effect. Concerned about runoff into the river and light pollution as well. CPA-20: Opposes the proposal as it violates GMA and Oregon spotted frog and Olympic mudminnow have been documented near the property. Port Tacoma proposal: Opposes due to rare Rocky Prairie habitat in good condition. Re-submitted to correct typos. See 298b

299	2/14/2023	Noll Steinweg	CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment	Recommends leaving land in the current zone designation to allow the continued support for Oregon Spotted Frog and Olympic mudminnow documented nearby.
309	2/14/2023	Bonnie J Blessing	CPA-16 Community Driven Review of Agricultural Policies and Programs CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment (PRELIM) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment JP-2 Tumwater UGA Zoning Ordinances for Consistency with City A-18 Thurston County Agricultural Activities Critical Areas Ordinance 17.15 for Consistency with VSP A-23 Rural Water Availability	Suggests collecting data now to demonstrate how projects avoid or minimize draining of wetlands and seasonal flooding.

From: [Chris Doelman](#)
To: [Maya Teeple](#); [Dana Bowers](#)
Subject: Incoming Comment on 2022-2023 Mid-Cycle Comprehensive Plan and Development Code Dockets
Date: Friday, February 10, 2023 9:02:17 AM

Name:

Chris Doelman

Email:

chrisdoelman@gmail.com

Select the Docket Item(s) you are Commenting On:

CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment

Comments:

Commissioners:

The Beaver Creek land is ideal for Industrial usage. It's within 1 mile from an I-5 on/off ramp. It has a rail line running through the property that has access to the Port of Tacoma, BNSF, and UP rail. And it offers a massive financial benefit to our community (as provided in previous comment periods). Now I would like to provide the data for the market's demand for Industrial lands in our area.

Please excuse the bullet point formatting:

- There are currently 5 mega-occupiers looking for land that can support more than 1 MSF in the Puget Sound (smaller industrial sites are less appealing). The Beaver Creek project can support up to 3 MSF.
- Near record demand drives strong rent growth and declining vacancy.
- Development remains at its highest level on record. However, roughly half of all properties currently under construction are set to deliver in the first quarter of 2023.
- Vacancy dropped below 3% for the first time in 5 years as demand continues to outpace new supply.
- Average asking rents increased 9.7% year-over-year to \$1.02NNN blended, crossing the \$1.00 mark for the first time.
- Record demand has outpaced new supply for the past 2 years. In response, the development pipeline is at its highest level on record. However, roughly half of all properties currently under construction are set to deliver in the first quarter of 2023.
- Surging demand has pushed vacancy near all-time lows with rents skyrocketing as a result. Vacancy has decreased 240 basis points while average asking rents have grown 32.9% over the last 2 years. Vacancy dropped below 3% for the first time in 5 years as demand continues to outpace new supply. Puget Sound has the 17th lowest vacancy of the top 50 largest industrial markets.
- Amongst the top 20 largest metros, the Puget Sound is tied for 4th in population growth from

2010 to 2022 Despite the smaller relative size, the Puget Sound added more residents than LA and SF combined

- Puget Sound migration has remained strong over the past 10 years, with projected growth outpacing the 2010's average. Relative affordability and ample employment opportunities continue to benefit Puget Sound.

This data was provided by Jones Lang LaSalle Research.

Time: February 10, 2023 at 5:02 pm

IP Address: 174.204.75.184

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-mid-cycle-comprehensive-plan-and-development-code-dockets/>

Sent by an unverified visitor to your site.

From: [Bonnie J Blessing](#)
To: [Maya Teeple](#); [Dana Bowers](#)
Subject: Incoming Comment on 2022-2023 Mid-Cycle Comprehensive Plan and Development Code Dockets
Date: Tuesday, February 14, 2023 4:35:51 PM

Name:
Bonnie J Blessing

Email:
bonnie.blessing@gmail.com

Select the Docket Item(s) you are Commenting On:

CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, (PRELIM) Black Lake Quarry: Site Specific Land Use and Rezoning Amendment, JP-2 Tumwater UGA Zoning Ordinances for Consistency with City, A-18 Thurston County Agricultural Activities Critical Areas Ordinance 17.15 for Consistency with VSP, A-23 Rural Water Availability

Comments:

For these projects in highlighted in sensitive areas, Thurston County should demonstrate how the projects will avoid or minimize draining of wetlands or seasonally flooded areas or avoid diverting or interrupting surface hydrology (Best management plan on page 235 of your HCP). Hydrologic data is difficult without site specific data (Biological Opinion p 83). But long term conservation and recovery needs of spotted frogs includes managing hydrology (Biological Opinion page 88).
Start collecting data now to acquire site specific data. Then use this to develop an appropriate plan.

Time: February 15, 2023 at 12:35 am
IP Address: 73.221.75.82
Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-mid-cycle-comprehensive-plan-and-development-code-dockets/>

Sent by an unverified visitor to your site.

From: [Vince Cottone](#)
To: [Maya Teeple](#); [Dana Bowers](#)
Subject: Incoming Comment on 2022-2023 Mid-Cycle Comprehensive Plan and Development Code Dockets
Date: Monday, February 13, 2023 9:23:45 PM

Name:

Vince Cottone

Email:

redwoodie@gmail.com

Select the Docket Item(s) you are Commenting On:

CPA-16 Community Driven Review of Agricultural Policies and Programs, CPA-8 Countywide Study of Industrial Lands, CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, CPA-22 Bar Holdings: Site Specific Land Use and Rezoning Amendment, (PRELIM) UP Castle LLC: Site Specific Land Use and Rezoning Amendment, (NEW) UP Castle LLC: Site Specific Land Use and Rezoning Amendment, A-25 Forest Lands Conversion Ordinance, Rural Tree Protection Standards, CR-1 Natural Landmark Program

Comments:

CPA-22

I am writing to oppose proposal CPA-22, Bar Holdings to rezone and add the parcels #11719220101, 11719210100, and 11719240302 to the Urban Growth Area because it violates the Growth Management Act (GMA) and would negatively impact many properties and residents in the surrounding area.

In 2008, Thurston County removed the north portion of #11719220101 from the UGA to comply with the ruling of the Western Washington Growth Management Hearings Board in BOCC Resolution #14034 and Ordinance #14035. The south portion of that parcel was formerly zoned 1 per 2 acres and in a LAMIRD that was removed as non-conforming, while the north portion was medium density residential 6-9 per acre.

The entirety of the subject parcels were then rezoned 1 per 5 acres Rural Residential. Properties to the west were downzoned from 1 per 5 acres to 1 per 10 acres to comply with WWGMHB ruling requiring more diversity in rural zoning as opposed to the old county-wide 1 per 5 acres configuration.

I was a proponent (along with the majority of other residents in the immediate vicinity) of the removal of land from the UGA south of 93rd Ave. in 2008. This was mandated by the action of the Growth Management Hearings Board in re: Futurewise v. Thurston County, #05-2-0002.

The ruling found an excess of capacity in the Tumwater UGA, among other cities in the county, as well as a lack of diversity in county zoning. To comply with the ruling, Thurston County removed 25 parcels (or parts thereof) located south of 93rd Ave. located between Old Highway 99 and Hart Road from the UGA, and downzoned the removed parcels (Interim Ordinance #14100, later made permanent) adjoining land south of 93rd Ave. from RRR1/5 to R1/10. The county stated that this action was intended to to preserve rural land and forest and to protect this environmentally sensitive area from development at urban densities and its

negative impacts.

Much of the land immediately south of 93rd is forested, including the subject and parcels immediately adjoining them. Some nearby forested areas have legacy trees over 100 years of age, including my property on Brooks Lane $\frac{3}{4}$ of a mile west of the subject site. There are numerous parcels within 1 mile that are protected by Conservation Easements (including mine) that provide perpetual protection for resources including forest, lakes, wetlands, streams and wildlife habitat.

The proponent's site plan depicts a very intensive development that is massively out of character with the surrounding neighborhood. Industrial zoning and intensive commercial development will permanently and negatively change the character of the area and result in increased car and truck traffic, especially on 93rd Avenue.

Tumwater already has plenty of Light Industrial zoned land north and west of the location with better access; more LI land is not needed. This proposal would create an island of industrial zoned land surrounded by less intensive uses, primarily rural and residential.

The subject site contains a visible remnant of the Cowlitz Trail, a spur segment of the historic Oregon Trail that traces the route of an historic Indian trail in use for 9,000 years. Tumwater just passed an ordinance aimed at adding it to the historic Oregon Trail. A portion of an 1853 survey map showing the route through Township 17 North is attached. The red outlined parcel is the timbered Kramer property immediately south of Bar Holdings parcel. The proposed development will obliterate that segment of a historic trail used by Native Americans for thousands of years.

The subject site is 100% within a Critical Aquifer Recharge Area, Category 1—the highest priority; and also lies 100% on pocket gopher soils. It is 265-300 feet from the Deschutes river, and the infiltrated storm runoff from 85% impervious cover will surely affect the river.

The City of Tumwater has stated its opposition to the rezone and UGA expansion in 2022, and has informed me that they still oppose it. There is an abundance of nearby land in Tumwater appropriately zoned for the type of development proposed by the proponent, and such development should be channeled there.

Returning land to the UGA that was previously removed from it under the GMA should not be permitted. The subject application should not be processed further, and the present zoning should be maintained.

CPA-20 Beaver Creek, Up Castle LLC upzones:
I oppose for reasons cited by Futurewise in their 2022 comments.

I support the following items:
CPA-8 Industrial Lands: Identify the most suitable lands for industry in order to protect agricultural, forested and habitat lands from development.

CPA-16 Community Driven Study of Ag Lands

CR-1 Natural Landmark Program: I support the concept of finding creative, workable ways to protect special lands. The challenge here is how to cover the costs and staff work to administer

such a program.

A-25: There should be incentives discouraging conversion of forest land into more intensive urban-type uses, and strengthening rural tree protections.

Time: February 14, 2023 at 5:23 am

IP Address: 207.108.218.43

Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-mid-cycle-comprehensive-plan-and-development-code-dockets/>

Sent by an unverified visitor to your site.

From: [Chad Kramer](#)
To: [Maya Teeple](#); [Dana Bowers](#)
Subject: Incoming Comment on 2022-2023 Mid-Cycle Comprehensive Plan and Development Code Dockets
Date: Tuesday, February 14, 2023 12:22:03 PM

Name:
Chad Kramer

Email:
jchadkramer@gmail.com

Select the Docket Item(s) you are Commenting On:

CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, CPA-22 Bar Holdings: Site Specific Land Use and Rezoning Amendment, (NEW) Port of Tacoma: Site Specific Land Use and Rezoning Amendment

Comments:

CPA-22 Bar Holdings: I oppose. I own the forested parcels immediately to the south and west of the proposed site. Our long-term plan has been to steward the land through the generations. The development of this site would end that goal and motivate us to sell, creating a dominos effect of development or rural lands leading to more development or rural lands, in violation of the GMA. Changing what is currently forestland to land that is 85% paved (as allowed with LI zoning) will create significant stormwater runoff into the river and will cause light pollution.

CPA-20 Beaver Creek. I oppose. It violates the GMA to convert this rural property to urban uses. Keep urban uses inside UGAs. The Oregon Spotted Frog and Olympic mudminnow are both documented near the subject property. Additionally, a large portion of the property is Designated Federal Critical Habitat for Oregon Spotted Frog.

Port of Tacoma proposal: I oppose. Rocky Prairie forms one of the rarest habitats in the world. There are only 20 sites in the world that contain Native Outwash Prairie and only 5 are considered in good condition; this site is one of them.

Time: February 14, 2023 at 8:21 pm
IP Address: 67.168.191.160
Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-mid-cycle-comprehensive-plan-and-development-code-dockets/>

Sent by an unverified visitor to your site.

From: [Chad Kramer](#)
To: [Maya Teeple](#); [Dana Bowers](#)
Subject: Incoming Comment on 2022-2023 Mid-Cycle Comprehensive Plan and Development Code Dockets
Date: Tuesday, February 14, 2023 12:24:33 PM

Name:
Chad Kramer

Email:
jchadkramer@gmail.com

Select the Docket Item(s) you are Commenting On:

CPA-20 Beaver Creek: Site Specific Land Use and Rezoning Amendment, CPA-22 Bar Holdings: Site Specific Land Use and Rezoning Amendment, (NEW) Port of Tacoma: Site Specific Land Use and Rezoning Amendment

Comments:

Please use this submission instead of the one I just sent, as I had to correct two typos.

CPA-22 Bar Holdings: I oppose. I own the forested parcels immediately to the south and west of the proposed site. Our long-term plan has been to steward the land through the generations. The development of this site would end that goal and motivate us to sell, creating a dominos effect of development of rural lands leading to more development of rural lands, in violation of the GMA. Changing what is currently forestland to land that is 85% paved (as allowed with LI zoning) will create significant stormwater runoff into the river and will cause light pollution.

CPA-20 Beaver Creek. I oppose. It violates the GMA to convert this rural property to urban uses. Keep urban uses inside UGAs. The Oregon Spotted Frog and Olympic mudminnow are both documented near the subject property. Additionally, a large portion of the property is Designated Federal Critical Habitat for Oregon Spotted Frog.

Port of Tacoma proposal: I oppose. Rocky Prairie forms one of the rarest habitats in the world. There are only 20 sites in the world that contain Native Outwash Prairie and only 5 are considered in good condition; this site is one of them.

Time: February 14, 2023 at 8:24 pm
IP Address: 67.168.191.160
Contact Form URL: <https://thurstoncomments.org/comment-on-2022-2023-mid-cycle-comprehensive-plan-and-development-code-dockets/>

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From: [DFW R6SSplanning](#)
To: [Dana Bowers](#)
Cc: [Steinweg, Noll E \(DFW\)](#)
Subject: WDFW comment Thurston County Mid-Cycle Docket Amendment - Doelman CPA-20
Date: Tuesday, February 14, 2023 1:08:09 PM
Attachments: [Beaver Creek WDFW comment 3.18.21.pdf](#)

Hi Dana,

Thank you for the opportunity to provide comment on the 2022-2023 mid-cycle docket review. WDFW offers the attached comment from 2021 which remains relevant for the proposed CPA-20 rezone.

Sincerely, Noll

Noll Steinweg
Habitat Biologist, Thurston County
Washington Department of Fish and Wildlife
360-628-2173 (cell)