



Nisqually River Council

12501 Yelm Highway • Olympia WA 98513 • (360) 438-8715

October 21, 2019

Council Membership

Pierce County
Thurston County
Lewis County
Cities of Yelm, Eatonville & Roy
Tacoma Public Utilities
Puget Sound Partnership
UW Pack Forest
WA Dept. of Natural Resources
WA Dept. of Fish & Wildlife
WA Dept. of Ecology
WA Parks & Recreation Commission
WA Conservation Commission
WA Dept. of Agriculture
WA Dept. of Transportation
WA Dept. of Commerce
WA Secretary of State
Nisqually Indian Tribe
Department of Defense, Joint Base Lewis-McChord
Billy Frank Jr. Nisqually National Wildlife Refuge
Gifford Pinchot National Forest
Mount Rainier National Park
Nisqually River Citizens Advisory Committee

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

Dear Board of Commissioners,

The Nisqually River Council (NRC) appreciates the ongoing updates we receive from County staff on the Nisqually Sub-Area Plan review, and the related proposal to change the current policy prohibiting recycled asphalt pavement (RAP) within the Nisqually Sub-Area. As stated in our letter of March 22, 2017, the NRC supports a collaborative and inclusive effort to update the Sub-Area Plan, and we appreciate the County's work to keep us informed and involved in the process.

At the NRC meeting on July 19, 2019, County staff presented the findings from the Phase I RAP study, which reviewed the literature on contaminant and leachate potential from RAP. As noted in that presentation, this Phase I study did not look at local conditions in the Nisqually sub-area or best management practices (BMPs). There remain significant questions about the possible impacts of RAP on water quality in the Nisqually Valley that cannot be answered without further study. The NRC urges the Board of County Commissioners to require on-the-ground field studies of RAP leachate behavior in the Thurston County region prior to moving forward with any change to the current policy.

The NRC's March 2017 letter also noted that "we do not support a narrow review of a proposal to modify the plan relative to recycled asphalt....A narrow consideration may have unintended consequences that can be avoided through a complete adaptive management look at the entire plan." The Nisqually Sub-Area is critical for local water supply and for ESA-listed species, including Chinook salmon, steelhead, and southern resident orcas. Further studies of the proposal to bring RAP into the Nisqually sub-area should be considered alongside other concurrent proposals, particularly the potential for sub-aquifer gravel mining and the potential risks posed to groundwater supplies from these activities happening simultaneously. In addition to field studies, the NRC supports a rigorous comparative review of BMPs related to RAP storage and processing to minimize precipitation contact, runoff, and other risk factors to our groundwater and surface water resources.

Since it was adopted in 1992, the Nisqually Sub-Area Plan has done a good job of balancing economic activities with protections for the sub-area's rural character and natural resources. The NRC continues to support a complete and holistic review of the Plan based on the best available science and consultation with our community stakeholders about their goals and priorities for the sub-area over the coming decades. Once again, we appreciate the continued partnership with Thurston County throughout this process.

Sincerely,

David A. Troutt
Chair