



Soundview Consultants

Environmental Assessment • Planning • Land Use Solutions

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Technical Memorandum

Date: August 15, 2017

Project Number: 1322.0002

To: Cari Hornbein
Senior Planner
City of Olympia
Community Planning & Development

From: Don Babineau, Soundview Consultants LLC

Re: Green Cove Park / Washington State Department of Ecology (WSDOE) comments July 14, 2017

Dear Ms. Hornbein,

This Technical Memorandum is prepared in response to WSDOE email comments to your office dated July 14, 2017. Soundview Consultants LLC (SVC) professionally disagrees with WSDOE's comments. The applicant, however, is yielding to WSDOE's opinion treating all onsite wetlands as Category III wetlands with habitat scores equivalent to 20 points which require 100-foot standard buffers per City of Olympia municipal code 18.32.535. As it has not been explicitly documented through the review process, applying the WDOE opinion to Wetland D yields the same general ratings results as the rest of the onsite wetlands (see attached comments).

Sincerely,

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Wetland D ratings comments:

WSDOE remark

D1.1: Is the outlet flowing year-round? If it's not permanently flowing, this would be 2 points.

SVC Response

Rating revised per WSDOE opinion

WSDOE remark

D1.3: 5 (use Cowardin classes)

SVC Response

Rating revised per WSDOE opinion

WSDOE remark

Adding 2 points for D1.1 and 2 for D1.3 would result in 11 points for this section, which is still Medium, so the overall score wouldn't change based on these two questions.

WSDOE remark

D2.2: This question needs a figure showing the area within 150 feet of the wetland. This was answered yes for same question in Wetland A originally, then it was changed in the new rating. The circumstances might be the same for Wetland D, as they're very close to each other, but we need the graphic to tell for sure. If yes, 1 point, and Medium for this section, which would increase the overall score by 1 point.

SVC Response

The 150-foot offset is entirely onsite, and since the onsite land use has been changed following WSDOE's opinion from a high intensity to a moderate to low land use intensity with no activity occurring onsite, the answer consistent with WSDOE's opinion is 0 points.

WSDOE remark

D3.1: If the outlet is permanently flowing, it looks like it flows directly (within 1 mile) into a stream that's on the 303(d) list, and this would score 1 point, for 2 points in this section, which would result in High, and 1 more point overall.

SVC Response

SVC observed the drainage flowing in late May; however, this was an exceptionally wet year and the wetland and drainage dry up in the summertime. In any case, the drainage was observed to end flowing to groundwater approximately 100 feet north of the wetland boundary, and therefore does not flow to a listed stream. So, no additional point.

WSDOE remark

D4.1: If the outlet is not permanently flowing, then 2 points for this question.

SVC Response

Rating revised per WSDOE opinion

WSDOE remark

D4.2: This appears to be a headwater wetland. If the wetland has a permanent or seasonal outflow through a defined channel but no inflow from a permanent or seasonal channel, it is a headwater wetland. This would add 3 points and result in either 6 or 8 points for this section (depending on the answer to D4.1). This would result in a Medium, which adds 1 point to the overall score.

SVC Response

The drainage was observed to end flowing to groundwater approximately 100 feet north of the wetland boundary. Headwater wetlands must connect to defined channel which remains an above ground system; therefore, Wetland D is not a headwater wetland as the drainage flows to groundwater.

WSDOE remark

D5.3: The contributing basin graphic does not show underlying land use, so I can't evaluate this.

SVC Response

The drainage basin is entirely onsite, and since the onsite land use has been changed following WSDOE's opinion from a high intensity to a moderate to low land use intensity, the answer consistent with WSDOE's opinion is 0 points.

WSDOE remark

H1.1: The forested class has at least three strata: canopy, shrubs, herbaceous, and possibly moss, which results in 1 more point for this question.

SVC Response

Rating revised per WSDOE opinion

WSDOE remark

H1.2: If there is a permanently flowing outlet, there may be a permanently ponded area also. If so, and it meets the area threshold, this would score one additional point.

SVC Response

SVC observed the drainage flowing in late May; however, this was an exceptionally wet year and the wetland and drainage dry up in the summertime with no permanent ponding.

WSDOE remark

H2.3: The project site is medium/low intensity. If there is less than 50% high-intensity land use in the 1-km polygon, this increases by 2 points. Figure 4 needs to be re-done.

SVC Response

Rating revised per WSDOE opinion.

WSDOE remark

We will need to recalculate the overall score once these questions have been answered and graphics provided.

SVC Response

The rating has changed based on the opinion of WSDOE to 5 points for water quality, 5 points for hydrologic function and 6 points for habitat for total a score of 16 points.

