



April 9, 2019

Schelli Slaughter,
Director

Rachel C. Wood, MD, MPH
Health Officer

Cari Hornbein, Senior Planner
City of Olympia, Community Planning & Development
PO Box 1967
Olympia, WA 98501-1967

Subject: City of Olympia 19-0330, Green Cove Preliminary Short Plat Application,
Tax Parcels 81700000000, 74202500100, 74202500200, 74202900000, Thurston County
Project 2019100671

Ms. Hornbein,

The above-referenced application has been routed to this agency for review and comment. This project is proposing to subdivide four existing tax parcels totaling approximately 50.28 acres into 181 single-family residential lots. This subdivision will be served by City of Olympia public water and sanitary sewer utilities.

The site has been mined for decades and is listed on the Department of Ecology's Contaminated Sites List, Facility ID 82016954. The SEPA Environmental Checklist submitted for this project does not include this information and only discusses illegal dumping on the site. While the conditions creating the known contamination that prompted the listing were addressed, resulting in the site receiving a No Further Action status, additional documentation has been submitted and further allegations of buried wastes on the site have been made. Maps provided by a concerned community member (attached) indicate fill and waste have been buried on much of the proposed development site. The 2015 Geotechnical Report prepared by AGES, LLC identifies garbage and woody debris within test pits located on the site. The property owner did not apply for or obtain a solid waste disposal permit for this site as required by Article IV of the Thurston County Sanitary Code or Chapter 173-350 WAC. The 2015 Phase 1 Environmental Site Assessment (ESA) notes strong diesel or oil smells were found in two test pits excavated on the site in 2007. Environmental Health's initial review is complete and the following additional information is requested to continue our review:

1. During the 1993 site assessment by Stemen Environmental, Inc for the underground storage tank removal, it was noted that the contaminated soils would be properly stored on the site until a treatment or disposal method was decided upon. There is no documentation identifying what was decided upon or approved. The applicant must provide the treatment or disposal method that was used to handle the contaminated soils on the property.
2. Test pits have been identified with garbage, woody debris, and smells of diesel fuel or oil as discussed in the 2015 Geotechnical Report, 2015 Phase 1 Environmental Site Assessment, and 2016 Addendum. The reports do not accurately detail the level of potential contamination from

either the petroleum or the solid waste. As the amount or type of solid waste or woody debris was not provided, it is unclear how much of the material is on the site or if it could result in future contamination of groundwater. Environmental Health believes the areas where fill and waste are buried need to be fully delineated (area and depth) and that the buried material needs to be accurately characterized to determine if they are solid or hazardous waste. This will determine if this material poses significant risk to public health and the environment and will guide testing, clean up and mitigation efforts that may be needed to develop the property.

3. A revised site plan is required showing all existing wells and on-site sewage system components located on the subject properties, and all existing off-site wells within 200 feet of the project site with their associated 100-foot sanitary control radii shown.
4. There is an existing drainfield located on Tax Parcel 74202500200 that serves the single-family residence located on neighboring Tax Parcel 12809140200. The applicant must confirm the existing drainfield will be properly abandoned and describe the proposed wastewater treatment for the residence located on Tax Parcel 12809140200. A copy of the record drawing is attached for reference.
5. Due to the aquifer sensitive nature of this area and the scope of this project, an Integrated Pest Management Plan (IPMP) has been prepared. The submitted plan has been reviewed by Environmental Health and the following items must be addressed:
 - In the project description, please explain what exactly the project entails and what portion of the development does the IPM plan cover. Is this plan for the site clearing and initial phase of development only or is it intended to encompass future development of individual lots and responsibility of the lot owners? Will there be stormwater ponds, infiltrations ponds, swales? Will there be common areas that individual lot owners don't maintain? If so, how will they be vegetated and how will they be maintained (mowed, pesticide free, etc.)?
 - If the plan is for the initial development only, please refer to the Vegetation Plan Section 6 and then explain what is being installed in the common areas, including stormwater ponds and turfgrass areas. Describe who will maintain these areas (homeowner's association (HOA), management office or contractor), and how they are to be maintained using IPM practices. If the plan is supposed to stay with each lot, then describe how it will be associated with their property (HOA requirement?) and provide recommended best management practices for IPM during installation and maintenance of individual lots (native plantings, fertilizer, watering, monitoring for pests, establishing injury level, taking control actions).
 - The Existing and Proposed Site Features section should be replaced with a reference to Section 6 of the Vegetation Plan (or include Section 6 here) and include a description of the actual stormwater system that will be installed for the project.
 - Tables 1, 2, 3 and 5 do not relate to IPM and are not necessary.
 - Table 6 and 7 are essentially your IPM plan along with Section 6 of the Vegetation Plan. I suggest pulling the contents of Tables 6 and 7 and putting them into the main text to respond to the comments above.

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Environmental Health's review of this project will be placed on-hold at this time. Our review will continue once we have received all of the requested information. If you or the applicants have any questions, I can be reached at (360) 867-2650.

Sincerely,

A handwritten signature in cursive script that reads "Dawn Peebles".

Dawn Peebles, R.S.

Environmental Health Specialist

Thurston County Public Health & Social Services Department