



SQUAXIN ISLAND TRIBE

August 1, 2019

City of Olympia

Cari Hornbein, AICP, Senior Planner, Community Planning and Development Department

Steve Thompson, P.E., Water Resources Engineer, Public Works

PO Box 1967, Olympia, WA 98507-1967

Ms. Hornbein and Mr. Thompson,

These comments are directed towards the proposed Green Cove Park Development at 2200 Cooper Point Road in Olympia. Stormwater from the proposed development will drain to three large wetlands and two other wetlands whose categorization are disputed. After minimal proposed treatment, most of the stormwater would ultimately drain to Green Cove Creek. Edges of the development may drain to Butler Creek. The site is underlain by glacial till, which is not a complete barrier to aquifers beneath it. This is because we don't know if the till layer is intact across the full extent of the property nor under the wetlands. Aquifers underlying the property may drain to the above creeks or to seeps on Budd Inlet, all of which are Treaty resources of the Squaxin Island Tribe.

In reviewing the Hydrogeologic Report and Civil Plans, I find the level of stormwater treatment inadequate for runoff from the proposed 181 lots and roadways. The hydrogeologic report is overly optimistic in stating that "clean water" will drain from wet ponds. Without evidence of enhanced treatment by the wet ponds, I am doubtful that clean water will drain from the wet ponds. If those and the wetlands recharge groundwater, the development will create a permanent train of pollutants moving through them to the vadose zone or perched groundwater, then to groundwater that drains to Green Cove Creek, Butler Creek, and other springs. I request that the developer add additional stormwater treatment as low impact development features at each home site and/or enhanced treatment features before they reach the stormwater ponds. The stormwater should be treated before it enters the ponds, and/or it should be treated and never enter the ponds because its infiltration is dispersed across the site where possible.

I have read multiple reports detailing illegal dumping of fill material on this site, and that fill material remains mixed in with the remaining soils on the site. This would make it so that stormwater treatment at each individual home site is not possible. I agree with the recommendations of Robinson Noble's June 5th, 2019 "Technical Memorandum, Green Cove Records Review, Data Gaps Analysis, and Recommendations", which include further soil sampling to characterize fill material that is mixed in the soil, methane testing, groundwater sampling, and sampling for contamination in the identified wetlands. If contaminated soils underlie the proposed development, then their continued contamination of soil water, wetlands, and groundwater would be made permanent.

Finally, the dirt track that exists just north of Wetland B and leads to the east side of the property is on fill material. I request that the landowner include that material in fill investigations, and pull the fill back to restore Wetland B to its original size, which extended northward from where it ends now.

Sincerely,

Erica Marbet

Erica Marbet

Water Resources Biologist