



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
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September 12, 2019

Robert Jenkins, Senior Planner
Pierce County Planning and Public Works
2401 South 35th Street, Suite 2
Tacoma, WA 98409

Dear Robert Jenkins:

Thank you for the opportunity to comment on the prethreshold consultation for the Nicolina Meadows PDD Project (915704, 915707, 915723, 915717, ADR49-09, SD5-09) as proposed by Pacific Northwest Holdings LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

TOXICS CLEANUP PROGRAM:

Adam Harris, LHG, Cleanup Site Manager (360) 407-6528

The proposed Nicolina Meadows PDD project, SEPA [201904659](#), is located immediately adjacent to the Former Brookdale Golf Course Toxic cleanup Site (Facility/Site ID Number 7758, Cleanup Site ID 14894). On March 21, 2019, Ecology received the initial report that hazardous substances had been released to the environment at the former Brookdale Golf Course. This toxic cleanup Site is currently enrolled in Ecology's Voluntary Cleanup Program and is being cleaned up independently under WAC 173-340-515. The following hazardous substances are reported currently present in soil at the Former Brookdale Golf Course Toxic cleanup Site at concentrations greater than 100 times appropriate cleanup screening levels:

- 4,4 DDE
- 4,4-DDT
- B-BHC
- D-BHC
- Aldrin
- Endosulfan I
- Dieldrin
- Endrin
- Endrin Aldehyde

Ecology cautions that that these toxic and cancer causing chemicals may also be present in soil or groundwater at the proposed Nicolina Meadows PDD project Site at similar concentrations. We are concerned that houses may be built on that contamination, and that families may unknowingly purchase and live at contaminated properties.

Prior to allowing construction to commence, Ecology suggests you require evaluation of the Nicolina Meadows PDD project Site, as it may be impacted by hazardous chemicals from the Former Brookdale Golf Course Toxic cleanup Site. We believe that to protect human health and the environment, it is prudent for you to require sufficient soil and groundwater sampling at the Nicolina Meadows PDD project Site to determine if contamination from the Former Brookdale Golf Course Toxic cleanup Site impacts the Nicolina Meadows PDD project. If contamination from the Former Brookdale Golf Course Toxic cleanup Site is determined to impact the Nicolina Meadows PDD project Site at concentrations greater than appropriate cleanup screening levels, those results will need to be reported to Ecology under WAC 173-340-300 (2), and a remedial investigation conducted under WAC 173-340-350. If the Nicolina Meadows PDD project is contaminated, Ecology suggests requiring cleanup of contamination at the Nicolina Meadows PDD project Site prior to construction of the proposed project, while contamination in soil and groundwater is still accessible and before contamination at the Site impacts the environment or health of any new residents, including families and children.

WATER QUALITY/WATERSHED RESOURCES UNIT:
Chris Montague-Breakwell (360) 407-6364

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
 - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
 - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at: [http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(MLD:201904659)

cc: Adam Harris, LHG, TCP
Azure Green Consultants (Agent)
Pacific Northwest Holdings LLC (Owner/Applicant)