



PUBLIC WORKS

Michael Mactutis, P.E.
Environmental Engineering Manager
400 West Gowe
Kent, WA 98032
Fax: 253-856-6500

PHONE: 253-856-5500

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Ann Mueller, Senior Planner
City of Covington
16720 SE 271st Street
Covington, WA 98042-4964

**RE: Hawk Property Planned Action
Draft EIS Comments**

Dear Ms. Mueller:

Thank you for the opportunity to comment on the Hawk Property Planned Action Draft EIS.

The proposed Hawk Property Planned Action Area is located north of Armstrong Springs, a municipal water source for the city of Kent. The Armstrong Springs wellhead protection area extends north to the southern boundary of the proposed project. Armstrong Springs has a high susceptibility to groundwater contamination due soil permeability, geologic materials, depth to water and topography. Protecting the quality and quantity of municipal groundwater sources are critical to ensure sustainability of communities.

Potential contaminant sources include spills (during construction and from permanent land uses) pesticides, fertilizers and stormwater runoff. Appropriate measures should be implemented during design and construction of the proposed project to ensure groundwater is protected. Please take into consideration the following comments during development of the Final EIS and review of the project.

- 1) The existing well should be decommissioned in accordance with Department of Ecology standards.
- 2) Stormwater should be adequately treated prior to discharging from the site.
- 3) Page 3-21 of the DEIS states seasonal impacts to Jenkins Creek may occur as a result of the project. Presumably, the same impacts may occur to groundwater resources. Please include a description of the impacts to both the stream and groundwater resources in the Final EIS and the season in which impacts are likely to occur.

- 4) Page 3-21 states that "*stormwater management plans for the site should route runoff from impervious surfaces to permeable soils and include water treatment measures to prevent infiltration of poor quality discharge.*" This language should be required to protect water quality in Jenkins Creek and groundwater resources.
- 5) Potential mitigation measures to reduce impacts on groundwater are listed on page 3-23. These measures should be required.
- 6) All landscaping should include native and/or drought tolerant species to reduce the need for irrigation, pesticides and fertilizers.
- 7) All equipment should be in good operating condition at all times. No equipment with leaks should be permitted on the construction site.
- 8) A specific location for refueling equipment should be identified that includes secondary containment in the event of a spill including spill kits and equipment to clean up any spills. Fuel should not be permitted to be stored on-site.
- 9) Please notify the City of Kent in the event of any spills. Any spills should be reported to the City of Kent Operations at (253)856-5600 in addition to the Department of Ecology as required. In the event notification to the City of Kent is required, please state that the spill is located in a wellhead protection area. A note on the face of the construction plans with applicable contact number would be appropriate.
- 10) The geographic area of the proposed development is located within Covington Water District which receives a significant portion of its municipal water from groundwater sources. To help protect ground resources on a regional scale, promote sustainability and educate the public about the groundwater resources, all entrances to the proposed development should have signage that states, "*Protect Groundwater, it's the Water You Drink.*"

Thank you again for the opportunity to comment on the Hawk Property Planned Action Draft EIS. Please feel free to contact me at (253) 856-5547.

Sincerely,



Kelly Peterson, AICP
Environmental Conservation Supervisor

c: Michael Mactutis, P.E., Environmental Engineering Manager
Kevin Swinford, Interim Water Superintendent
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