

From: [Greg Wingard](#)
To: [Ann Mueller](#)
Subject: Hawk Property Draft Planned Action EIS
Date: Monday, August 26, 2013 2:12:53 PM

Ann:

I am submitting the following comments for this draft EIS. Due to time constraints the comments are limited.

The DEIS states that the condition for modelling existing conditions for the site is "pasture." This is not the natural, or historic condition of the site, and if used would result in mitigation, and in particular stormwater controls less protective than the condition the site should be modeled on, which is forest.

Historically this site was forest, forested wetland, scrub/shrub wetland and open water features, in particular Jenkins Creek. Jenkins Creek is one of the largest tributaries to, and a significant portion of the Soos Creek basin. Soos Creek is the most important salmon bearing creek on the Green/Duwamish River system, in particular for Chinook Salmon, an endangered species. The DEIS does not provide sufficient weight to this critical sub-basin, which the project will have substantial adverse impacts on. In addition, Jenkins Creek in its own right is also a salmon bearing creek, and provides critical habitat to salmonid species.

In addition the DEIS fails to consider that the Green River, including the Soos Creek basin currently has a significant area on the state 303(d) list under the federal Clean Water Act, and is currently subject to a Total Maximum Daily Load action for temperature and dissolved oxygen, by the federal Environmental Protection Agency, and Washington State Department of Ecology. Increased temperature, and decreased dissolved oxygen are known to be parameters adversely impacted by urban development, in particular through increased impervious surface in close proximity and discharging to receiving waters.

This is the exact condition we have with this proposed project, as the DEIS admits. The project is in close proximity to, and constrained by steep slopes, wetlands associated with Jenkins Creek, and the creek itself. Salmonids are particularly susceptible to increased water temperature, and lowered oxygen. In spite of these conditions, and the known TMDL process, which Covington is participating in, there is no mention of, or any consideration of these either known, or easily foreseen unavoidable adverse impacts from the proposed project, especially given that Covington has selected the most intensive, highest impervious surface option as the selected alternative.

The DEIS also fails to consider the full range or types of pollutants which will be generated by residential/commercial/industrial development proposed. Both of the former community plans for the area, the Tahoma-Ravens Heights plan, and the Soos Creek plan included extensive consideration of the impacts to the area creeks, including Jenkins, and Soos Creek, from build out and development. This included studies of sediment pollutants from road run-off, and in streams as well as projections of likely pollutants resulting from additional impervious surfaces and urban development of the area.

Given these studies were done some time ago, and given the intensity of

the proposed development for the DEIS area, the lack of consideration for chemicals such as metals, which have critical impacts on aquatic species such as zinc, copper and lead, as well as chemicals known to impact salmonids at very low levels, such as petroleum, and polynuclear aromatic hydrocarbons, is shocking.

As a result, I don't believe the DEIS meets the requirements of law, and has failed to take a hard look at adverse impacts that this project is certain to have in such close proximity to Jenkins Creek and related wetlands and upland ecosystems. Further modeling conditions assumed in the DEIS are substandard, and would result in lessening the level of protection for a critical receiving water, Jenkins Creek, and its related wetlands, which are themselves also waters of the state.

Regards,

Greg