From:	Karen Walter
To:	Ann Mueller
Subject:	Hawk Property Subarea Plan, Draft Environmental Impact Statement
Date:	Monday, August 26, 2013 1:05:40 PM
Attachments:	Landscape Ecotoxicology of Coho Salmon Spawner Mortality in Urban watersheds.pdf copper toxicity_visibility vulnerability juv coho salmon predation by cutthroat trout_McIntyre et al 2012.pdf Copper_effects_on_Salmonids_-_Abstracts_C A _Woody1.pdf

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Ann,
The Habitat Program of the Muckleshoot Indian Tribe Fisheries Division has reviewed the Draft Environmental Impact Statement for the Hawk Property Planned Action referenced above. Previously we provided comments to the scoping notice which are shown below. With our scoping comments, we also included the attached papers regarding impacts to salmonids from metals in stormwater. Unfortunately, the DEIS fails to address these comments and is missing any responses in Appendix A. The FEIS should address these issues in some detail as this environmental review provides the opportunity to examine these issues programmatically and determine if any of the proposed action alternatives may have more impacts than not.

For example, Alternative 3, Maximum Village Proposal is estimated to result in 99.6 acres of impervious surfaces versus 75.8 acres under Alternative 2, Minimum Urban Village Proposal. From available scientific literature, we know that increases in impervious surfaces generally result in adverse impacts to streams, wetland and aquatic resources, including fish (i.e. Booth and Jackson, 1997; May et al 1997; Booth 2000; Morley 2000; Booth, Hartley, and Jackson 2002; etc.). There is no discussion in the DEIS about any impacts to salmonids that may occur from future development associated with the alternatives identified in the DEIS (see Section 3.5). We specifically included the attachments above so they could be used as part of Covington's assessment of alternatives for direct and indirect impacts, including potential stormwater discharges to Jenkins Creek, in the DEIS.

The FEIS should include an expanded analysis that discusses all potential impacts to salmonids from stream/wetland buffer reductions, trails and associated human/pet disturbances, stormwater impacts and baseflow reductions from all impervious surfaces. As part of this analysis, there should be further details as to how these impacts will be avoided and minimized/mitigated where they are truly unavoidable. For example, the DEIS identifies the proposed Jenkins Creek Trail near the wetland/stream buffer but fails to discuss if this trail can be relocated such to avoid impacting the Category 1 Wetland buffer and stream buffer. As this area appears to be mostly forested currently, it would be ideal to relocate the trail to avoid temporary and permanent impacts to these buffers, including the potential permanent loss of future wood recruitment necessary to create instream fish habitat.

Similarly, Figure 3.10-1 shows an proposed sewer line that looks like it will go through the regulated wetland and stream buffer parallel along Jenkins Creek throughout the subarea. In our experience, where these sewer lines are located, they preclude the permanent reestablishment of trees due to concerns with tree roots affecting the sewer line. This permanent impact should be avoided by locating the sewer line in areas that will be redeveloped outside of the regulated buffers.

There is more water quality data available for Jenkins Creek than discussed in the DEIS. King County has been conducting water quality monitoring in Jenkins Creek (and elsewhere) as part of the Total Maximum Daily Load Allocation Study for the Soos Creek Watershed (see http://your.kingcounty.gov/dnrp/library/2009/kcr2022/SAP.pdf) as has University of Washington.

Also within King County's Soos Creek water quality monitoring plan, there is a figure showing Chinook use of Jenkins Creek near the project area (see page 11 of KC's QAPP). Chinook salmon use in Jenkins Creek was not identified in the DEIS.

In addition to missing Chinook use data, the DEIS fails to consider how the Soos Creek TMDL implementation recommendations to ensure compliance with State Water Quality Standards will be met. For example, the initial TMDL recommendations are to protect existing riparian corridors and

reduce impervious surfaces (see https://fortress.wa.gov/ecy/publications/publications/1210020.pdf). As there are likely differences between the two action alternatives in meeting these recommendations, the FEIS should discuss the Soos Creek TMDL and how the proposed alternatives could affect TMDL implementation for Jenkins Creek and downstream areas. Part of this should be a more robust discussion about mitigation measures initially described in Section 3.2, including benefits to salmon from using enhanced water quality treatment methods to manage stormwater based on impacts identified in the salmon literature we provided in our scoping comments and with these DEIS comments.

Further, a reduction in baseflows in Jenkins Creek (see page 3-22) would also likely adversely affect salmon which was not considered in the DEIS. As a result, infiltrating treated stormwater using enhanced treatment methods should be required wherever suitable soils exist. We also agree with the mitigation measure to abandon existing wells (page 3-23) and new irrigation wells should be prohibited.

In summary, the FEIS needs more details and analysis about potential impacts to salmon that may occur from each of the alternatives and how each alternative would use mitigation sequencing, starting with avoidance to avoid impacts to salmon and Jenkins Creek and its associated wetlands.

We are available to meet to discuss these issues further, please call me to set up such a meeting. We appreciate the opportunity to comment on this DEIS and look forward to the City's written responses.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

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From: Karen Walter
Sent: Friday, March 29, 2013 10:44 AM
To: Ann Mueller (amueller@covingtonwa.gov)
Subject: FW: Hawk Property Subarea Plan, Determination of Significance and Scoping Notice

Ann,

My apologizes; the previous email we sent did not include the technical reports we referenced in the email below.

Karen Walter
Watersheds and Land Use Team Leader

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From: Karen Walter
Sent: Friday, March 29, 2013 10:43 AM
To: Ann Mueller (amueller@covingtonwa.gov)
Subject: Hawk Property Subarea Plan, Determination of Significance and Scoping Notice

Ann,

We have reviewed the City's Determination of Significance and Scoping Notice for the Proposed Hawk Property Subarea Plan. We offer the following comments in response to this scoping notice.

The project area/subarea includes or is adjacent to Jenkins Creek, a salmon-bearing tributary in the Soos Creek basin. We recommend that the DEIS analyze and discuss the following:

1. Details about the plans to reclaim the Lakeside gravel mine (assuming the mine will be closed to accommodate future land use) and protection/restoration of the large wetland (1D) shown in the gravel mine on King County's IMAP;

2. Details regarding how Jenkins Creek and its large associated wetland will be protected and potentially restored (where needed) as part of the subarea plan;

3. Details regarding how stormwater will be managed in the subarea, including the opportunities to fully treat and infiltrate stormwater using enhanced treatment methods that reduce or significantly limit the amount of metals and PAHs in stormwater that may be discharged to Jenkins Creek. Also, the opportunities to implement low impact development techniques and retention of trees. As part of this analysis, the DEIS should consider the available data in the attached papers regarding stormwater impacts to salmon, particularly coho, a species found in Jenkins Creek.

4. The DEIS authors should contact WDFW and the Muckleshoot Indian Tribe Fisheries Division to obtain the most current information regarding salmon populations in Jenkins Creek and the Soos Creek basin prior to completing any analysis of potential impacts.

We appreciate the opportunity to provide comments to the Scoping Notice and look forward to reviewing the DEIS that addresses our recommendations above. Please let me know if you have any questions.

Karen Walter
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