

CHAPTER 6. EXHIBITS

LETTERS TO AGENCIES AND RESPONSES

This chapter includes an example letter that was sent to the agencies listed in Chapter 5, followed by the agencies' responses.

December 5, 2006

Ms. Sue Patnude
Washington Department of Fish and Wildlife
48 Devonshire Road.
Montesano, Washington 98563

Subject: Port Hadlock Environmental Report

Ms. Patnude:

As part of Port Hadlock potentially becoming a UGA (urban growth area) the City may install a sewer collection system and wastewater treatment plant. Tetra Tech/KCM has been hired to create a Sewer Facility Plan. The Sewer Facility Plan is exploring alternatives for types of sewer systems as well as locations and types of wastewater treatment. The alternative sites for the wastewater treatment plant are included on the provided map.

Potential Impacts

Implementation of projects that are identified in the Sewer Facility Plan would have an overall beneficial impact to the fish habitat by improving water quality. The proposed project would remove the houses and commercial developments from septic tanks and drain fields and connect them to a sewer system. The work would be done in phases with the total area being serviced in 20 years. There is a potential for construction related erosion and consequent sedimentation into Chimacum Creek and a nearby wetland which are located close to the proposed construction sites. This erosion and sedimentation could temporarily degrade water quality and fish habitat in the river. There is no work proposed within the river itself, however, the location of the outfall has not been determined yet. All of the pipeline work occurs within roadways or road shoulders. Rigorous implementation of best management practices during construction will reduce the potential for this habitat degradation from construction related erosion and sedimentation.

Single-family residential and a small commercial occupy the service area.; consequently a portion of the area is impervious due to buildings, parking lots, streets, and driveways. With the increase in commercial and residential development with the new zoning laws under the UGA indirect and cumulative impacts could occur with the increase in impervious area and the corresponding increase in storm water runoff.

The Washington Department of Ecology (WDOE) requires an environmental review for sewer plans and engineering reports. The environmental review is conducted according to United States Department of Agriculture Rural Development protocols for an Environmental Report. Part of the protocol is obtaining comments from the regulatory agencies and Native American Tribes on items of concern regarding the Port Hadlock Sewer Facility Plan.

The City of Port Hadlock requests that you review our plans and projects and target your comments toward those items of concern to your office including direct, indirect, and cumulative impacts of our proposal. A response within 30 days of the date of this letter would enable your comments to be incorporated in the final Environmental Report. Please call Liz Korb at (206) 883-9368 if you have any questions or would like to discuss the project.

Sincerely,
Tetra Tech/KCM, Inc.

Liz Korb
Water Resources Engineer

Enclosure: Map of proposed sites



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

4063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

November 27, 2006

RECEIVED
NOV 29 2006
TETRA TECH/ACM, INC.
SEATTLE, WA 98101

Ms. Liz Korb
Tetra Tech/KCM
1420 Fifth Avenue, Suite 600
Seattle, Washington 98101-2357

Re: Port Hadlock Sewer System and WWTF Project
Log No.: 112706-01-CSDA-RD

Dear Ms. Korb:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Port Hadlock Sewer Collection System and Wastewater Treatment Facility in Jefferson County, Washington.

Given the area's landforms and environment that are sensitive for cultural resources in the area, we recommend a professional survey of any area proposed for disturbance. We also recommend consultation with the concerned tribe's cultural committees and staff regarding cultural resource issues.

If federal funds or permits are involved Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800, must be followed. We would appreciate receiving any correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment on this project and we look forward to receiving the survey report.

Sincerely,

Robert G. Whittam, Ph.D.
State Archaeologist
(360) 586-3080
Email: rob.whittam@dahp.wa.gov





WASHINGTON STATE DEPARTMENT OF
Natural Resources

December 5, 2006

Liz Korb
Tetra Tech/KCM Inc
1420 Fifth Avenue Suite 600
Seattle WA 98101-2357

RECEIVED

DEC 06 2006

TETRA TECH/KCM INC
SEATTLE, WA 98101

DOUG MITCHELL
Commissioner of Public Lands

SUBJECT: Port Hadlock – Proposed Wastewater Treatment Plant and Sewer Collection System (T29N R01W S01-03,11,12; T30N R01W S34,35)

NOTE: The Washington Natural Heritage Program (WNHP) is expanding our Information Request Service to include a new self-service system. Data users now have the choice of accessing limited tabular information for free, via our website, or licensing and using the WNHP GIS data set for a fee. The self-service tabular information now available on the WNHP website (<http://www.dnr.wa.gov/whp/contact/selfservice/gvs.html>) consists of a Township, Range, and Section (TRS) list where Natural Heritage features are reported to occur. Attribute data is not included, however, the data user can refer to the list to determine whether it is necessary to contact WNHP for more information. For-profit organizations will be charged a fee for follow-up consultations with WNHP staff.

We've searched the Natural Heritage Information System for information on significant natural features in your project area. Currently, we have no records for rare plants or high quality native ecosystems in the vicinity of your project.

The information provided by the Washington Natural Heritage Program is based solely on existing information in the database. In the absence of field inventories, we cannot state whether or not a given site contains high quality ecosystems or rare plant species; there may be significant natural features in your study area of which we are not aware.

The Washington Natural Heritage Program is responsible for information on the state's rare plants as well as high quality ecosystems. For information on animal species of concern, please contact Priority Habitats and Species, Washington Department of Fish and Wildlife, 600 Capitol Way N, Olympia WA 98501-1091, or by phone (360) 902-2543.

Please visit our internet website at <http://www.dnr.wa.gov/whp> for more information. Lists of rare plants and their status, rare plant fact sheets, as well as rare plant survey guidelines are available for download from the site. Please feel free to call me at (360) 902-1697 if you have any questions, or by e-mail at sandra.moody@wadnr.gov.

Sincerely,

Sandy Swope Moody, Environmental Review and Grants Coordinator
Washington Natural Heritage Program

Asset Management & Protection Division, PO Box 47014, Olympia WA 98504-0014
FAX: 360-902-1739

1111 WASHINGTON STREET ■ P.O. BOX 47000 ■ OLYMPIA, WA 98504-7000
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WDC 00000000

Ms. Korb,

In a preliminary review of the Port Hadlock Sewer Facility Plan I can only submit some general guidelines for you to follow.

It appears that the project lies within the Coastal Zone and you will need to file for a shorelines permit, I recommend that you speak with the county and develop a SEPA review to submit to Ecology.

It also appears that there will be impacts to wetlands from the submitted site plans. It will be necessary to prepare a wetlands report of the wetlands on site that delineates and rates the wetlands using the 1989 federal wetlands delineation methodology.

If the development requires fill to be placed within the wetlands it may require a permit from the Army Corps of Engineers. The local representative for the Corps in Jefferson County is Koko Cronin, she can be reached at (206) 764-6878. If the Corps requires a permit it will also be necessary to receive a certification through the Department of Ecology. To expedite this process I recommend submitting a JARPA (Joint Aquatic Review Permit Application) to both the Corps and Ecology as soon as possible.

If you have any further questions, please don't hesitate to ask.

Sarah M. Lukas
SEA Program
Department of Ecology
(360) 407-7459

Ms Korb,

Thank you for providing access to the Draft Environmental Report - Facility Sewer Plan to WDFW for review. WDFW offers the following comments at this time. Additional comments may be offered as the project progresses.

WDFW supports the recommendation that two of the seven alternatives, the marine outfall and natural wetland alternatives, not be considered as they potentially could significantly degrade fish and wildlife habitat. In general, WDFW recommends tertiary treatment plants with either direct aquifer injection or recharge using a created wetlands. As a result, no decertification shellfish beds occurs, aquifer recharge is maintained, and no nutrients enter marine or freshwater bodies. According to Bob Burkle, Region 6 Assistant Habitat Program Manager, these types of facilities are in use in Yelm and Lacey and are being proposed for the Belfair/Hoodsport/Potlatch/Skokomish areas of Hood Canal. It appears the recommended alternative, the rapid-rate infiltration system, is this type of facility and thus, will avoid and/or minimize impacts to fish and wildlife.

According to the Priority Habitat and Species (PHS) map it appears some of the sites may be within or near documented palustrine wetlands. For the protection of fish and wildlife, WDFW recommends the facility be constructed upland and in a manner that avoids impacts to wetlands.

Thank for the opportunity to provide comments.

Randi Thurston
WDFW Region 6
502 High Street Suite 108
Port Orchard, WA 98366
(360) 895-6123

Ms. Liz Korb
Tetra Tech / KCM, Inc.
1420 Fifth Avenue, Suite 600
Seattle, Washington 98101

I received your email request for comments on the City of Port Hadlock Environmental Report, dated January 3, 2007. I was unable to access the map so my comments are not site specific, but general in nature to the type of project you are proposing.

The Executive Order for Floodplain Management (EO) 11988 requires all federal actions be reviewed for impacts to the floodplain. The EO 11988 requires federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid the direct or indirect support of floodplain development whenever practicable. FEMA provides technical assistance to other federal agencies in the implementation of this Executive Order.

FEMA appreciates the effort the city of Port Hadlock is taking to upgrade their sewer treatment facilities. You may end up determining that the facilities proposed for upgrade are outside the floodplain. I recommend you contact the local floodplain administrator for Port Hadlock to help you in making that determination. If the facility is outside the floodplain and has no potential to affect the floodplain (regardless of its location) then the EO process would be met and can be concluded. However, the outfall would be considered in the floodplain and therefore is subject to EO review. For any facility proposed for upgrade in the floodplain that is not dependent on the location within the floodplain (like the outfall), the EO requires all locations outside the floodplain be explored and utilized if practicable. I recommend you document this analysis and why you reached any conclusions that require locations in the floodplain. In evaluating indirect impacts with this sewer upgrade project, the federal agency has a responsibility to consider the potential growth or encouragement of growth with the installation of the sewer upgrade (indirect and cumulative effects). Specifically, the potential growth for future development within the 100 year floodplain needs to be evaluated and avoided or minimized to the maximum extent possible. One way this can be done is by evaluating the type of zoning in the affected area and any current growth trends of the city and adjacent county.

The construction of a more efficient waste water treatment facility and associated ancillary facilities is generally a beneficial effect when evaluating impacts on the floodplain. In analyzing the effects of those facilities that must be located in the floodplain, the analysis should also evaluate impacts flooding will have on those facilities. If any part of the infrastructure is to be located within the 100 year floodplain, appropriate measures should be taken to minimize damages that could occur should a flooding event occur. For example, the outfall could be impacted by flooding, thereby perpetuating further investment into the floodplain. The design should consider that potential impact and also other environmental factors, such as impact on fish habitat, which is a natural function of a floodplain.

Again, FEMA has no approval or regulatory responsibility with regard to the EO. However, it is in FEMA's interest to protect our taxpayer dollars through sound floodplain management practices and subsequent avoidance/minimization of future disaster assistance.

Thank you for allow me an opportunity to comment. If you have any questions, please call me at 425-487-4735.

Sincerely,
Mark G. Eberlein
Regional Environmental Officer

Dear Ms. Korb,

I have reviewed the Port Hadlock Environmental Report. I do not have concerns regarding the potential impacts as identified in the Sewer Facility Plan provided best management practices are implemented as so stated in your report. Additionally, I circulated a copy of the report at the January Jefferson County Conservation District Board Meeting and the District Board did not wish to provide any comments.

With Regards,

Jim Poffel
Resource Conservationist
Port Angeles NRCS Field Office