

September 13, 2021

**EXHIBIT G, SEPA COMMENTS PAGE 1 OF 11**

Attn: Amelia Schwartz, City Planner  
Community Development  
1321 S Market Blvd  
Chehalis WA 98532

RE: Washington Avenue Multi-Family Housing; SEPA-21-0006; SEPA 202104738

Ms. Schwartz:

The Southwest Clean Air Agency (SWCAA) has learned that your agency has issued/will issue a SEPA Determination for the above project. Please be advised that SWCAA administers/enforces a number of regulations that may apply to the proposed project. The applicability of these regulations depends on the exact nature of the project in question. The following section provides a brief summary of the requirements for the general types of activity that may be affected by this project.

**Construction Dust [SWCAA 400 - General Regulations for Air Pollution Sources]:**

- Construction and earthmoving activities have the potential to generate excessive dust emissions if reasonable control measures are not implemented. SWCAA Regulation 400-040(2) requires that “no person shall cause or permit the emission of particulate matter from any stationary source to be deposited beyond the property under direct control of the owner or operator of the stationary source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited”. Furthermore, SWCAA Regulation 400-040(8)(a) requires that “the owner or operator of any source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions”.
- Common control measures to mitigate the emission of dust from construction and earthmoving activities include: application of water before and during earthmoving operations, application of water to disturbed surface areas (including access roads and staging areas) after earthmoving operations, application of chemical dust control products and/or surfactants, limiting access to open/disturbed areas, reducing equipment/vehicle speeds, establishing vegetative cover on inactive areas and ceasing operations altogether during high wind events.
- Violations of SWCAA Regulation 400-040 may result in civil penalties being assessed against the project operator and/or property owner.

The proponent of this project may contact SWCAA at 360-574-3058 for more information regarding the agency’s requirements. Notification forms, permit applications, air quality regulations and other information are available on the internet at <http://www.swcleanair.gov>.

Sincerely,



Duane Van Johnson  
Air Quality Specialist II





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 14, 2021

Amelia Schwartz, City Planner  
City of Chehalis  
Community Development Department  
1321 South Market Boulevard  
Chehalis, WA 98532

Dear Amelia Schwartz:

Thank you for the opportunity to comment on the prethreshold consultation for the Washington Avenue Multi-Family Housing Project (SEPA-21-0006) located at 1137 Southeast Washington Avenue as proposed by Fuller Designs. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287**

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from the local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials.

**TOXICS CLEANUP: Andrew Smith (360) 407-6316**

This property is within a quarter mile of a known or suspected contaminated site. The site is Market St Market, FSID# 49951617. To search and access information concerning these sites see <http://www.ecy.wa.gov/fs/> and <https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>. If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Andrew Smith with the Toxics Cleanup Program at the Southwest Regional Office at (360) 407-6316.

Amelia Schwartz  
September 14, 2021  
Page 2

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

(GMP:202104738)

cc: Derek Rockett, SWM  
Andrew Smith, TCP

# CITY OF CHEHALIS

**Public Works Department**  
2007 N.E. Kresky  
Chehalis, Washington 98532  
(360) 748-0238 / Fax (360) 748-0694  
[www.ci.chehalis.wa.us](http://www.ci.chehalis.wa.us)



To: Ms. Tammy Baraconi  
City of Chehalis Building and Planning Manager  
1321 S Market Blvd  
Chehalis, WA 98532

September 16, 2021

Re: City of Chehalis permit numbers SEPA-21-0006 and ST-21-0011

Ms. Baraconi,

This letter is in response to your request for comment on the proposed land use action submitted in conjunction with a request to vacate portions of SW Adams Avenue, SW 12<sup>th</sup> Street, and an undeveloped alleyway, followed by subsequent rezoning of the land, and multi-family residential development pursuant to the State Environmental Policy Act (SEPA) that requires government agencies to consider the environmental impacts of proposed developments.

The provided supporting site plan proposes that two 4-plex multi family units will be constructed fronting Aust Manor as part of this project. Public works is not in favor of direct egress on SE Aust Manor for the following reasons:

- The application and all supporting documentation indicate that ingress/egress to the competed site will be from the corner of SE 12<sup>th</sup> Street & SE Washington Avenue. SE Aust Manor is never mentioned.
- Post vacation process, this parcel will have a SE Washington Avenue address. In the interest of public safety for first responder access, emergency vehicles must be able to access the entire site from SE Washington Avenue.
- SE Aust Manor is not suitable for commercial road approaches, which are required for multi-family construction.

Thank you for the opportunity to review the application and supporting documentation for SEPA-21-0006 and ST-21-0011

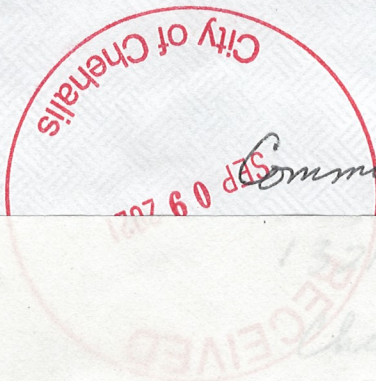
Sincerely,

A handwritten signature in blue ink, appearing to read "Trent Loughheed".

Trent Loughheed, P.E.  
Public Works Director  
City of Chehalis

MRS. JEAN DURR  
1411 S. E. Washington Ave.  
Chehalis, WA 98532

TACOMA WA 983  
OLYMPIA WA  
7 SEP 2021 PM 2 L



Community Development Dept.

9/4/2021

Community Development Dept.  
1321 S. Market Blvd.  
Chehalis WA 98532

Attn: Amelia Schwarty, City Planner  
Land Use Case # SEPA 21-0006 + ST-21-0011

I approve of more housing in Chehalis but not at the location listed. Washington Ave. between SE 11<sup>th</sup> + SE 16<sup>th</sup> is very narrow, as is SE 12<sup>th</sup> St. On some places 2 cars cannot pass each other.

Many shoppers at Safeway exit the parking lot on SE Washington + go south to SE 16<sup>th</sup> to get onto Market St. The number of housing units proposed would cause impossible traffic in the area.

Therefore I appose the housing project.

Jean Durr  
1411 SE Washington Ave., Chehalis



December 7, 2021

Amelia Schwartz  
City Planner  
City of Chehalis  
Building & Planning Department  
1321 S Market Blvd  
Chehalis, WA 98532

RE: Review of Nicholas Washington Avenue Traffic Study

Dear Amelia,

Gibbs & Olson has reviewed the above referenced traffic study prepared by Fuller Designs in conjunction with City of Chehalis Municipal Code (CMC) 12.04.330 Traffic Impact Analysis.

The submitted traffic study is not a traffic impact analysis and does not meet the requirements of CMC 12.04.330. CMC 12.04.330.B.2.c requires a traffic impact analysis be completed in accordance with the requirements outlined in CMC 12.04.330 when the proposed project is within an existing transportation benefit district. Per CMC 3.11.010, the Chehalis Transportation Benefit District geographical boundaries are comprised of the corporate limits of the City of Chehalis. The proposed project is within the city limits and is therefore within an existing transportation benefit district.

Based on our review, Gibbs & Olson recommends the City of Chehalis require the project proponent to prepare and submit a full traffic impact analysis (TIA) that addresses all required elements as outlined in CMC 12.04.330 for the proposed project.

If you have any questions regarding the above information, our review or our recommendation, please contact me at your convenience.

Sincerely,

Richard A. Gushman, PE

File: 0155.0184

## Amelia Schwartz

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**From:** LA DAWN MUSIC <l.music@comcast.net>  
**Sent:** Monday, September 13, 2021 11:09 PM  
**To:** Amelia Schwartz  
**Subject:** SEPA-21-0006, ST-21-0011

**NOTICE:** This message originated outside of the City network - **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe!

After reviewing the proposed multifamily dwelling proposal, we have concerns and objections to specific portions of the development.

1. Animals. The application notes hawk, eagle, and songbirds. However, there is no mention of at least two deer families that spend regular time both on the building proposal location and our property. We can provide photograph proof if you need it to show the wildlife presence as recently as this evening.

2. Tree removal. The site plans document the removal of multiple trees on the city easement. Our understanding of the site plan indicates two of the trees are outside of the region being vacated. We object to the removal of that many of the trees.

a. The region provides a natural habitat for the local deer and other animals.

b. We are concerned that the removal of all but two trees raises will weaken the root systems of the remaining trees, potentially causing issues with hillside erosion. The health and root support of the remaining trees could be damaged by the removal.

We understand that report from All American Geotechnical notes that the entire 5-parcel site has moderate erosion potential that could be mitigated by use of retaining walls and shrubbery. As the homeowners uphill from the proposed development site, we are concerned that our home/property could be effected by downhill erosion.

We would rather all of the trees remained, but understand that this is unlikely to occur. If the remaining trees become unhealthy and fall due to removal of the adjacent trees, will the site owners be responsible for potential property damage for caused by the removal of the remaining trees' habitat/support system? Is there a compromise that can be reached that does not as drastically effect the land?

3. The rear of buildings B4 and B5 follow our driveway. Will this complex be fenced off or have another form of separation so that the tenants are not using our driveway as access to their homes? Also regarding our driveway, we re-gravel the driveway every couple of years. The delivery point is at the wide turn around next to the RW2 retaining wall. We have no intention of damaging the property of my neighbors, but am concerned about what may happen and what liability we may have if there is damage caused by maintenance of my own property.

4. As noted above, we are not convinced that the statement on the SEPA checklist that "the proposal will not affect other adjacent properties" is accurate. Building B4, building B5, and a retaining wall are located mere feet from our driveway.

5. Building B5 and possibly B6 are in the down hill drainage pathway from the natural spring located on our property just past the driveway. Will ST2 catch basin storm filter and FD1 French drain be

sufficient in the winter when the water table is higher and there is standing water uphill from the complex?

The report from All American Geotechnical is incomplete. The company was hired in March of 2021 to complete a geotechnical report for the properties. The report notes a bizarrely mapped unclassified watercourse with two branches, the eastern most which is mapped as climbing approximately 50 feet up-slope on a slant without the benefit of a stream bed. The water courses do not appear in the field, do not appear on LiDAR, and have not been mapped with any set backs.

The report is incomplete as it was done based on a late spring examination of the area. The report notes no upland water bodies and no ponding water. For that time of year, this is correct. However, this is not true for the late autumn and winter months when there is ponding water on our property due to a combination of the weather patterns and rising water table from precipitation. If the unclassified watercourse being referenced is part of the drainage route for our natural spring, then there may be issues not yet being considered in the construction design.

Thank you for taking the time to review our concerns regarding this project.

La Dawn Music  
Steven Raynolds





## Community Development

2025 NE Kresky Avenue  
Chehalis WA 98532

September 13, 2021

To: SEPA Administrator

RE: Multi-Family Housing Project - 4 two-story fourplexes and 4 two-story duplexes. / MSC21-0056

Date Received: August 31, 2021

Comments Due: September 13, 2021

Thank you for the opportunity to review and comment on the above project. Lewis County Community Development circulated your documents to the Environmental Health and Public Works departments for their comments. Following are the County comments:

- Access - No comment
- Private and public survey monument at the exterior of these parcels shall be maintained and replaced if destroyed per WAC 332-120-040.
- Survey monuments exist for these parcels per record of survey recorded under AFN 3531692 and 3223000.
- Roads are within the city.
- Project will be served by the City of Chehalis Water supply.
- Traffic data accurate. Traffic impacts within the city limits
- Building/Fire - No comment, City of Chehalis
- Stormwater permitting shall occur under the City of Chehalis requirements

Respectfully,

*Megan Sathre*

Megan Sathre  
Lewis County Community Development  
[Megan.Sathre@lewiscountywa.gov](mailto:Megan.Sathre@lewiscountywa.gov)

Sept. 14, 2021

Ameilia Schwartz

Community Development

Concerning Fuller Designs request, land use cases: SEPA-21-0006 and ST-21-0011

My main concern is the small amount of parking included in this SW Washington Ave multi-family housing project. Over all the plans only have 19 more parking spaces than apartments, which will be inadequate for the usual percentage of two driver, two car, apartment renters.

The two Fourplexes that front on SE Aust Manor Dr only have 8 parking spaces. SE Aust Manor Dr is a narrow road that requires pulling off into a driveway or the narrow shoulder to allow oncoming traffic to pass and does not accommodate much on street parking. With only room for 8 parking spaces, it would make more sense to have two duplexes on lot 005604192001 or keep it zoned as R-1, which would fit in better with the rest of the neighborhood.

It may not matter but I noticed the application left off deer as part of the resident wildlife. I see deer eating the apples and grazing in the meadow on SW Washington Ave, lots 005490001000, 005490000000, and 005853001000. I also have deer eating my plants and traveling through my yard on SE Aust Manor Dr.

Trudy Neumann

# CITY OF CHEHALIS

**Public Works Department**  
2007 N.E. Kresky  
Chehalis, Washington 98532  
(360) 748-0238 / Fax (360) 748-0694  
[www.ci.chehalis.wa.us](http://www.ci.chehalis.wa.us)



To: Ms. Amelia Schwartz  
City of Chehalis Planner  
1321 S Market Blvd  
Chehalis, WA 98532

October 7, 2021

Re: Traffic Study submitted in association with SEPA-21-0006

Ms. Schwartz,

This letter is in response to your request for comment on of the trip generation study submitted by Fuller Design in conjunction with SEPA-21-0006, for proposed multi-family development at 1137 SE Washington Avenue, located inside the Chehalis city limits. This comment is made in response to a private citizen's concern that traffic flows from the proposed development will have a negative impact on the level of traffic service in the surrounding area, and is made pursuant to Chapter 43.21C RCW, State Environmental Policy Act (SEPA) regulations that require government agencies to consider the environmental impacts of proposed developments.

- The traffic study provided for this project indicates an additional 11 morning peak-hour and 13.4 evening peak-hour trips, however, the LOS has not been identified for either intersection before or after project. The TIA must be expanded to calculate LOS to ensure adequate capacity.
- A construction stormwater general permit may be required.

Thank you for the opportunity to review the application and supporting documentation for UGA-SEPA-21-0006.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trent Loughheed".

Trent Loughheed, P.E.  
Public Works Director  
City of Chehalis