

Barb Wood and Jim Park
16135 Railway Rd SE
Yelm, Washington State 98597

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Grant Beck, Director of Community Development
City of Yelm
P.O. Box 479
Yelm, WA 98597

RE: MDNS ENV-08-0397-YL

Thank you for the opportunity to comment. In general, we think that the report was limited in information and redundant on the analysis reports, and thus difficult to comment on due to the separate environmental issues that include multiple watersheds.

However, we have the following comments and questions on the MDNS ENV-08-0397-YL:

We appreciate the studies that you have completed on the impacts to Yelm Creek, however, we have the following questions and concerns on the “Yelm Creek Restoration Opportunities”.

8. Predicted impacts to the Nisqually Valley hydrologic area includes changes in groundwater discharge to Yelm Creek (at the point of discharge to the Nisqually River). Under Phase 1, the highest annual discharge decreases by up to 0.04 cubic feet per second (cfs), with the maximum depletion occurring in the spring.

We assume this is referring to the Peterson property. What are the impacts to the mid-reach of Yelm Creek where it is dry 11 months of the year? That is where instream flow is needed.

Under Phases 2, 3 and 4, the discharge to the Creek increases compared to the baseline case by up to 0.27, 0.32 and 0.24 cfs, respectively; in these three phases; the maximum increases will all occur in late winter and spring.

What is the current baseline? What data are you using to determine “baseline”. Are the flows cumulative increased flows? Our experience over the past ten years is there is no flow between February to January the following year.

Also, we are concerned about increases to flow during the “late winter and early spring”. Will that increase flooding during high precipitation or “rain on snow” events? Please detail on the FIRM map the potential increases during flood events, as these increases could affect our property.

The maximum summertime increase in Phases 2, 3 and 4 will be 0.23, 0.28 and 0.23 cfs, respectively. These increases result from the net effect of pumping 4,186 ac-ft/yr from the deep Undifferentiated Tertiary Aquifer (TQu) at the new Wellfield, which involves transferring 952 acre-feet per year pumping from the shallow Advance Vashon Outwash (Qga) aquifer (downtown-area wells). Yelm Creek is in relatively closer hydraulic connection to the Qga aquifer.

Yelm Creek is an intermittent creek. There has not been flow in the creek during the summer months for decades. Thus, we do not believe that these increases are not for base flow, but for potable water for local wells. Again, please clarify the benefits to late summer and early fall base flow and impacts to landowners during the winter months?. Also, please clarify if the values are additive.

Including Yelm Creek impacts, there will also be cumulative monthly changes in groundwater discharge to the Nisqually River at River Mile 4.3 for the four phases. Under Phase 1, the model predicted that the groundwater discharge will be up to 0.21 cfs lower than under baseline condition, with the maximum depletion occurring in August.

Under Phases 2 and 3, the total discharge to the river will increase year-round compared to the baseline; the maximum increases will be 0.29 and 0.25 cfs, respectively, both occurring in spring.

Is that due to the increased groundwater discharge to Cochrain Park? Please clarify?

The summertime increases will be up to 0.25 and 0.20 cfs. Under Phase 4, the model predicts that a decrease in groundwater discharge will occur year-round compared to the baseline, with a maximum depletion of 0.28 cfs occurring in September. However, the cumulative predicted depletions represent less than one percent of the baseline discharge to the river in all months for Phases 1 and 4.

In addition to the Yelm Creek mitigation described above, the City of Yelm has entered into discussions with the Nisqually Indian Tribe regarding out-of-kind mitigation of Yelm Creek. This mitigation plan provides the working agreement between the City of Yelm and the Nisqually Indian Tribe. The City of Yelm is committed to working with the Tribe on the following restoration opportunities:

- Creek channel restoration between 103rd Avenue and First Street, with meanders and in-stream habitat features.

What are you restoring the channel for and for what time a year? Chum? Coho? Other aquatic species?

The reach between 103rd and First Street has not had any sustained flow for over a decade, except for a few days to few weeks during high precipitation events during the winter. Is this the best place for restoration? 103rd and above have always maintained flow year round.

We applied for multiple grants to do adaptive management on our 900 feet of creek that was “restored” in 1990. When there is water, we have fish stranding, so removal of “levees” and thus restoration is a good idea. However, all proposals we have submitted to granting agencies have been ranked low based on the WRIA 11 SRFB priorities, and thus not funded.

- Create a continuous vegetated buffer along creek

It would be more advantageous to remove exotic species. Historically, Yelm Creek had no continuous vegetated buffer.

- Stream gage on Yelm Creek (per Watershed Plan)

Thurston County has two gauges on Yelm Creek: One at 103rd and one at the mouth. Does this imply that the City of Yelm is going to fund these gauges in perpetuity?

- Remove riprap weirs at pipeline crossing”

This should not be considered mitigation, for it was never approved in the original HPA issued by WDFW. It was a violation that was never corrected by the contractors doing work for the City of Yelm.