

From: Larson, Andy <LarsonA@wsdot.wa.gov>
Sent: Tuesday, June 29, 2021 6:59 AM
To: Loretta Swanson; Kell Rowen
Cc: Schueler, JoAnn; Engel, Dennis; Sawyer, Jeff; Ott, Sarah; Sanoy, Gaius; Perez, Joseph; Turpin, Theresa; Kokenge, Kyler; Moody, Lone
Subject: Belfair Planned Action EIS Review Comments

Hello Loretta,

WSDOT has reviewed the Belfair Planned Action EIS and we have the following comments:

- Lack of nonmotorized facilities
 - Support the plan to extend sidewalk from its current terminus on SR 3 near MP 25.39 south to SR 106 at MP 24.91. Recommend the plan also include extending bicycle lanes in that section.
 - Support the plan's proposal for trail along SR 300, but the path should remain on SR 300 to create a connected network. The plan leaves a gap along SR 300 to the downtown business district, which would be a valuable destination for nonmotorized users.
- Planned transportation improvements
 - Recommend including intersection improvements at the SR 3/NE Clifton Ln and SR 3/SR 300 intersections. These intersections are constrained under the existing traffic volumes, and additional growth will further deteriorate the system.
 - Support the recommendation for a roundabout at the SR 300/NE Old Belfair Hwy intersection
 - Support intersection improvement at the SR 3/Romance Hill Rd intersection – a roundabout should be assumed as the improvement as a conservative measure for funding-planning purposes
 - Additional development will create additional traffic impacts which will further constrain the system. Exhibits 3-57 and 3-60 show the impacts of additional development.
 - Will need to evaluate the intersection operation of many stop-controlled and signalized intersections in the UGA – near or exceeding LOS threshold with existing conditions, will be exacerbated with future growth
 - The existing two-way-left-turn-lane (TWLTL) may not be the best solution with additional development – may need to consider access management strategies
- Proposed mitigation measures
 - Need to consider managing access on SR 3 – not currently considered
 - Need to consider replacing the signal at SR 3/Clifton Rd with a roundabout instead of advocating for the permissive left turn as currently stated
 - Need further discussion at the SR 3/Ridgepoint Blvd intersection – EIS dismisses roundabout prematurely
- Section 1.6.9
 - It is important to keep in mind as mentioned in the document, the SR 3 Freight Corridor will be a limited access highway. The freight corridor is anticipated to be T-3; carrying 300,000 to 4 million tons of freight annually. Therefore, any new developments along the freight corridor should be required to provide frontage roads and because it is a freight corridor, those developments should include active transportation, such as separated bike paths as part of the development. With the growing popularity of Ebikes,

hills are less of an issue for the commuting cyclists. Having separated bike paths and frontage roads will go a long way to enhancing multimodal connections and is in compliance with the Belfair Mobility Plan.

- Exhibit 3-29 Park, Trails, and Open Space Plan (2004)
 - I realize this is an older plan and the alignment of the SR 3 Freight corridor has been evolving, it would be good to consider revising this drawing as it appears there are potential conflicts with the SR 3 Freight Corridor Limited Access Highway.

- Page 3-147 Non-motorized improvements
 - Because SR 3 Freight corridor will be classified as T-3 freight corridor and limited access, WSDOT concurs with the statement that as developments occur, “*required frontage improvements*” from new developments are appropriate. A separated facility parallel to the SR 3 Freight corridor is consistent with the limited access/T-3 Freight Classification and with the Belfair Mobility Plan.

Andrew Larson, PE
Development Services Engineer
(360) 900-9541

Mariah Frazier

From: Planning
Sent: Monday, June 14, 2021 10:12 AM
To: Ken VanBuskirk
Cc: Mariah Frazier
Subject: FW: KELL - Comment on Belfair DEIS

FYI

From: BRIAN PETERSEN <drbrian@hctc.com>
Sent: Friday, May 28, 2021 12:18 PM
To: Planning <planning@co.mason.wa.us>
Subject: KELL - Comment on Belfair DEIS

Hi Kell,

Hope this note finds you well.

I only have three main comments on the DEIS materials I went through.

1. At the southern "environmental node" as we referred to it in the original plan... we do have a new park identified and designed ... The "Sweetwater Creek / Waterwheel Park". This park is right across from Theler and it is actually in our 'Parks & Trails Comp Plan' for Mason County and therefore also in our most recently updated "Mason County Comp Plan". I think it would be helpful if this was identified on the EIS and called out by name since it is so far along in it's development and already in the Comp Plan.

2. The Romance Hill Connector has been discussed for years. This connector / ROW was originally purchased and improved by Public Works Director, Jerry Hauth for the specific purpose of a future connection at this location. The community supported this connection through multiple community meetings in our UGA Master Planning sessions throughout a three year process. The final zoning plans the community settled on shows a small pocket of commercial zoning at the future intersection of Romance Hill and the Belfair Bypass. This connection has been discussed and planned for over 20 years. This is good planning. Let's make sure a couple people don't politicize this. Remember, IF there was no mid point connector, people would need to make a decision on possible commercial stops in town... two miles north of town... if they wanted to change their mind and drop in for some shopping, they couldn't get back off the bypass until 3 miles south of town by the high school and then would have to backtrack into town... which few would do.

Also, keep in mind the traffic patterns identified over the years. The amount of people using the bypass has been overstated at times. Many 'passers by' are folks who will continue traveling down 106 to Union or up Dalby / McReavy Rd. to Shelton or down to 101 to Shelton and beyond. Those people will still come through the heart of the commerce center. However, if they are truly only 'passers by' trips and they wanted to avoid the heart of the commerce center at the Starbucks light, they could stay on the bypass.... come down the Romance Hill road and take a left on 3 and still head south.

Romance Hill is critical for our commerce center and yet still helpful for the pass through traffic.

3. Future investment in sewer line extensions should be stubbed lines to access our own 'industrial' zoned lands... including a stub of the main under highway 3.

That's it....

Thanks for your time and for this process. Sorry I missed the last one online but I appreciate you allowing continued comment on this.

Cheers,

Dr. Brian Petersen
ADIO Properties, LLC
(360) 710 0855

Mariah Frazier

From: Courtney Flora <cflora@mhseattle.com>
Sent: Friday, June 4, 2021 3:30 PM
To: Kell Rowen
Subject: Belfair PAO and Subarea Plan

Hi Kell— Thanks for forwarding the updated draft. Here are our initial comments on the proposed code language. It would be great if we could connect on Monday to run through these.

- In Attachment B under MCC 17.20.020, “Mixed-Use/Master Plan” should be added as one of the Districts Established.
- The new 17.23.200 says the purpose of the MP-MU district is to “allow a mix of commercial and residential uses with a focus on business/industrial park development and multi-family housing.” But the allowed uses in 17.23.210 are only those uses allowed in General Commercial and Mixed Use—not in Residential or Business Industrial. We may need to add some of the residential and BI uses to meet the intent of the zone; we will review in more detail.
- What’s the rationale for including 17.23.220, Special Uses? If we have to go through a Master Plan process anyway, probably no need to have this section.
- Apex is reviewing the new landscaping standards, and we may have additional comments on that.
- In the new 17.23.280 (“Master Plan”), it would be helpful to have a process statement, such as “Allowed uses under the 10-acre threshold will be reviewed and approved through an administrative site plan application, consistent with adopted regulations. Proposals exceeding the 10-acre threshold may be reviewed under a Type III Master Plan process, as outlined in MCC 17.70.”
- In 17.70.016(c), add a final sentence, “In the Belfair UGA, the applicant will submit a SEPA checklist for purposes of determining consistency with the Planned Action Ordinance. If the proposal is consistent, no further SEPA review will be required.”
- In 17.70.016 (e), add a final sentence: “For proposals in the Belfair UGA subject to a Type III process, no Development Agreement is required.” (An open record hearing before the Hearing Examiner and Council would violate state law).
- In 17.70.017(a), change “may approve” to “shall approve” in the opening sentence (“may” suggests that if all the approval criteria are met, decision-maker could still deny project, which doesn’t make sense)
- 17.70.017(a)(2) requires compliance with the review criteria in 17.70.015(b), which doesn’t exist. This reference should be deleted or corrected.
- In 17.70.017(a)(8) add “significantly” before “adversely impacted” (this could be interpreted to mean any adverse impact, no matter how minor, precludes approval)
- An extended vesting provision should be added. The memo references 15-vesting with the option of requesting 5 year extensions; I don’t see that anywhere in the current or draft regulations.

Hope this all makes sense—again, happy to talk through it. Thanks, and have a great weekend!

Courtney Flora
Partner

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Mariah Frazier

From: Planning
Sent: Monday, June 7, 2021 3:20 PM
To: Mariah Frazier
Subject: FW: Belfair UGA EIS comments

From: Judy G Scott <ssconstruct@hotmail.com>
Sent: Monday, June 7, 2021 1:42 PM
To: Planning <planning@co.mason.wa.us>
Subject: Belfair UGA EIS comments

Greetings

I believe it is important and critical for a SR 3 Freight Corridor/Romance Hill Road Roundabout A Single lane roundabout to be incorporated into the plan even though it shows (Unfunded Improvement Incorporated into the Plan) The economic and safety of access to the down town and medical facilities is important. Even though there are some issues with this road. If there should be a shut down of the North and/or South end of the Freight corridor access points this road would be an added safety measure. Also for the economic viability for the “downtown” area of Belfair an extra measure of accessibility is vital for businesses to thrive.

I also support the change from Festival Retail to Mixed Use.

I have concerns and questions in regard to the “options” of short term agricultural zoning? This property is my property and I do not support any changes at this time.

Thank you
Judy Scott

Sent from [Mail](#) for Windows 10

June 4, 2021

To: Kell Rowen, Community Development Administrator

Mason County Planning Advisory Commission

Mason County
Mason County Community Services
615 W Alder Street
Shelton WA 98584

Comments to: SEPA scoping materials, Draft Belfair EIS, Draft update to 2004 UGA plan, Proposed Development Code amendments, and Draft planned action ordinance.

SEPA scoping materials:

Post card notices of SEPA scoping materials were originally distributed to several local businesses and were not widely known in the community as they were not mailed out. The original scoping materials contained UGA boundary revisions that removed a substantial portion of the NW corner, (Riverhill, Newkirk road) area, from the UGA. There was no public notice mailed to the residents of the UGA of this consideration. The boundary revision was removed from consideration with little public involvement. I was told it was because a County Commissioner did not like the idea! I submitted several scoping comments about modifying the UGA boundary that seem to have been ignored.

The reason given for the comment period being extended a week was due to the SEPA register not having the Scoping Document which was sent out in November 2020. The draft EIS distribution list does not list the City of Bremerton, Mason County Hospital District 2, and Mason County Cemetery District 1.

There was a lot of discussion in the original scoping meeting about facilitating growth that supports a community-based vision for Belfair. This community based vision is not widely known or supported as evidenced by the lack of public involvement to date. The biggest hot topic issue in our community right now is what is going on with all the land clearing and how will it affect traffic.

Draft Belfair EIS:

The April 29th letter preceding the EIS 3 speaks to the subarea plan, infrastructure improvements and mitigation fees being key issues facing our decision makers. I agree.

Fact sheet iv. Preceding the EIS describes the Alternative #3. I support this alternative focusing development on the plateau out the valley and CARA, however only with the following adjustments to Alternative #2.

Do not include the Public Facility, Festival Retail or R5 rezones described in Alternative 2 instead modify, revise UGA boundary to remove public WDFW property west of Timberland Regional Library and remove all properties in the Irene Creek and Viola Creek drainages.

Summary 1-8: I doubt that Belfair water district will be able to serve the entire study area without modifying the UGA boundaries. How many permit exempt groundwater wells with buffers exist in the study area?

Summary 1-11: Discard 2nd bullet point regarding expanding the mixed use zoning in connection with building a freight corridor Romance hill connector. This connection concept is not widely supported in the community. Discard 3rd bullet point regarding rezoning 94 acres from R-4 to R-5. This is also not widely supported in the community and would only add to transportation concurrency dilemma. Amend 4th bullet point to include undevelopable state owned property on western edge of UGA.

Summary 1-20: In my opinion impact fees should be established for schools, parks and transportation infrastructure.

Summary 1-24: Mason County **should** rather than “could” implement a funding mechanism for stormwater system for UGA.

Proposals and Alternatives 2-5: Refresh UGA plan-first bullet point typo, “area” should be replaced with word “are”.

Proposals and Alternatives, 2-6, 7: Exhibits 2-3 and 2-4 depict UGA boundary in wrong location. 2 separate properties rezoned out of UGA.

Proposals and Alternatives, 2-9: Exhibit 2-5 Public facility zoning on Old Belfair highway is not compatible with nearby long term agriculture and ARL, agricultural resource lands. Two documented eagles nest, 1100 and 1900’ to SW.

Proposals and Alternative 2-13: Planned Action Boundary should only cover east portion of UGA.

Chapter 3. Earth 3-3. Geographically Hazardous Areas. With more than 30% of the UGA lands being classified as a landslide hazard area all development including parks and trails and roads should be excluded from those areas. Again all future development should be focused on the eastern UGA away from these landslide hazard areas. With this in mind the planned Romance hill connector to freight corridor should be abandoned. In addition the most recent DNR tsunami modeling should be included as appendices to plan. <https://www.king5.com/article/weather/earthquakes/new-maps-show-how-a-tsunami-could-impact-seattle-and-puget-sound/281-199e4224-07fa-4d31-9464-71976b1e8a01>

Water Resources 3.2.1 Affected Environment page 3-10 “A large portion of UGA is within area where ground water resources are important and must be protected.” How will County accomplish this protection?

Page 3-11 Exhibit 3-3 depicts the CARA stopping at UGA boundary. I think it is important that the map shows that the CARA extends outside the UGA boundary. I think the percentage of UGA land in a CARA should be calculated and addressed in the EIS similar to what was done for the Geographically Hazardous areas. I think the 2013 Mason County CARA team recommendations regarding the CARA

ordinance should be considered and referenced in the mitigation measures and referenced in EIS. (Attached).

Page 3-12, discusses Hood Canal and a 182 largest wetland but doesn't say where it is at. Need to be identified by location, landmark if nothing else.

Page 3-13, Exhibit 3-4. How can a plan be approved and adopted with inaccurate data? Same faulty data including fish presence used by same consultant in 2018 Belfair UGA Basin Plan.

Page 3-14, 15 wetlands. Mason County needs to characterize and rate all the wetlands in UGA immediately before any more are filled in. Reference pages 33 and 184 of 2018 Belfair UGA Basin Plan.

Page 3-17, Wells and groundwater states that there are no zoning changes proposed between alternatives over the CARA. That is false. Zoning changes include the current fire station being constructed on Old Belfair highway, the whole festival retail zone to mixed use and yet to be constructed 100 apartments on Roy Boad road as depicted on scoping post card and incorrectly rezoned from R-5 to R-10 in 2018 before moratorium was removed in 2019. Development code for the FR to mixed use rezone, **if approved**, will need to be amended to remove dry cleaners from allowed uses. They are prohibited in a CARA.

Chapter 3.3 Plants and Animals, 3.3.1 Affected Environment. Page 3-24 bottom. Due to conflicting information only streams depicted on DNR database are considered official fish habitat. How can you approve this plan when the DNR database is known to be faulty?

Page 3.28-2nd paragraph, Mindy creek tributary crossed under SR-3. (DNR 2020) wrong location. Stream was rerouted a short distance when SR3 was widened but still merges with Mindy creek and enters Union River not Hood Canal.

Page 3.29 Plant and animal impacts common to all alternatives. Recent SEPA done for NMRFA building and rezone to Public facility failed to identify that their project and entire UGA lie in US Fish and Wildlife "Pacific" migratory bird flyway. Also there are two active Bald eagle nests adjacent to western boundary of UGA. The closest being 600 feet from UGA. Both sites are in the Union River valley in the area I suggested to be removed from UGA.

Page 3-33. Federal regulations should include the Federal Bald and Golden Eagle protection Act administered by the U. S. Fish and Wildlife Service.

Page 3-36, Exhibit 3-11 existing land use map is wrong for two parcels off of old Belfair highway, undeveloped conservancy land and residential across street.

Page 3-40 Major pipeline developments. PCI LLC sets on a CARA. Major community concern with traffic mitigation for pipeline developments. Some feel they fail to timely meet GMA goal 11 and 12 on page 3-43.

Page 3-41. Streams not depicted as referenced in key.

Page 3-46 Existing Development Capacity. Comments received in scoping process support the proposal to modify UGA boundary to remove NW part of study area from UGA. The land capacity analysis considered the effects of modifying the boundary and found it had little effect to the capacity. **The PAC should make a recommendation to modify UGA boundary in Union river valley as part of alternative #3 focusing development on plateau in eastern portion of UGA.**

Page 3-65 Exhibit 3-22 Archaeology sites. Applicant misrepresented 45MS197 as an archaeology site. It wasn't listed **until 2012** as a historic hydroelectric site. The waterwheel site was built in the **1950's** after a trout pond and spillway was built by a Mr. Barber and a large excavator. The waterwheel was decorative only and served no other purposes.

Page 3-106. Last sentence. "The County currently does not have a stormwater utility fee or a dedicated funding mechanism for stormwater capital improvement projects." **PAC should recommend that the County establish a stormwater utility fee.**

Page 3-108 Exhibit 3-44 Existing stormwater facilities. What is the regional storm water WSDOT facility located outside UGA on PNWSC property? Is it in use? By WSDOT?

Page 3-112 Belfair water district anticipates that Alternative 2 and 3 growth projections exceed water district plans. **What is the PAC going to recommend regarding? Will recommendation consider concurrency requirements?**

3.9 Transportation

Page 3-120 Transportation section is the most I have been hearing about in community and is perhaps the largest issue if not the most expensive infrastructure.

Page 3-131 Belfair connector projects.

Only one connector to the freight corridor built at Log yard road utilizing existing round about is the most common sense solution. The Romance Hill connector to the freight corridor is not a community supported option. Romance Hill road bisects a Land slide hazard area. If it is connected to freight corridor the connection costs should be paid by developers.

Page 3-133 Planned transportation improvements.

NE Clifton Lane Access Management at SR 3: The only left-turn to and from NE Clifton Lane between SR 3 and Roy Boad Road are currently restricted and to provide a compact roundabout at Roy Boad Road to allow u-turning is not necessary and a poor idea as it is only 200' from next intersection and there is a Mason Transit Authority bus stop with lots of pedestrians.

NE Old Belfair Highway/SR 300-NE /Clifton Lane Roundabout: This project was identified as part of the original 2004 subarea plan **seventeen years ago as a signalized intersection**. So much for concurrency!

2004 T-7: Signalize the Clifton Lane/Old Belfair Highway intersection. Install a traffic signal at this intersection when warranted. Include pedestrian sidewalks and signals on all four legs of the intersection. This intersection is very dangerous. Locals refer to it as Belfair's IQ test. A roundabout in this location is not good. There are too many pedestrians! Signalize intersection like recommended in 2004.

Page 3-134. Pedestrian and bicycle network. Bicycles and dogs are not allowed on Theler trail system. The proposed trail linking Romance hill, SR-3 and Salmon Center is in a large landslide hazard area. Trail maintenance is very expensive.

Page 3-135 Exhibit 3-53 Proposed trail is in a landslide hazard area. Risk is unacceptable. Trail maintenance in steep ground is expensive and causes erosion.

Page 3-146 I fail to see how County can meet the 6 year concurrency requirement. It appears County has already approved new developments with less than adequate current levels of service.

Page 3-148 Capacity improvements. 2 way left turn lane on Old Belfair highway to Newkirk road is a bad idea. Would not be necessary if a modified Alternative 3 was selected with UGA boundary revisions I earlier described.

Draft 2021 Belfair UGA Plan

I was a member of the 2004 plan committee. It was a large committee made up of 27 people and we had over 14 public meetings which were all well attended. On the cover page of the plan there is a large building depicted, the Salmon Center. It was a 36,000 square foot facility depicted on 25 acres and was one of the three development nodes in the 2004 plan. On page 6 of the 2021 draft version it talks about the Salmon Center being constructed in 2009 and that it has cemented the "theme", and is a tourism draw with 300,000 visitors a year anticipated. It should be noted that it was moved to Agricultural Resource land outside the UGA. 300,000 visitors a year is way outside the scope of their special use permit, current transportation and sewer infrastructure cannot support and cannot be extended outside of the UGA.

Page 11.

March 15, 2021 PAC meeting. Important to note that PAC discussed minor modification to redirect trails and **parks** from identified landslide hazard areas.

April 19, 2021, Community meeting under RCW 43.21.c440(3)(b) meeting was not noticed well and there were no public members or public agencies in attendance.

Page 14. Why is Salmon Center depicted on map? It is not in UGA and map gives impression that it is an important area. Outside the scope of their special use permit!

Page 15. Romance Hill connection is planned. This is not a community supported vision. If built it should be paid for by developers(s). Natural environment- the CARA acreage should be depicted as a percentage of total UGA acreage like the Land Slide Hazard Area.

Page 16. Bikes and dogs are not allowed on Theler trails and WDFW lands.

Page 21. Depicts loop trail in Landslide hazard area.

Page 23. Park and multifamily residential sited on a class 1 wetland that was identified as a potential stormwater facility in 2018 basin plan.

Page 31. LU-1 Where is the recommendation that was in original scoping document regarding removing a portion of the Riverhill community? I think the residents of Riverhill and the Old Belfair Highway should be surveyed. Also another publically owned WDFW parcel on western edge of UGA should be removed. There was no public discussion about either.

Page 32. LU-2 Mixed Use designation -Assumes Romance Hill connector to freight corridor will be built. Very expensive, developers should pay total cost for infrastructure. Community does not support. Where Mixed Use is on top of the CARA specific recommendations should note prohibited uses and uses requiring environmental permits per Mason County Resource ordinance. 8.52.120

Page 34,35. LU-3 Support the concept. That area has the greatest potential for smart growth and the plateau is where there are minimal environmental impacts. The hydrology layer needs to be corrected to remove nonexistent streams. Alternative 3 with a reduction in Uga and development in the Union River valley makes most sense.

Page 40. LU-6 Map incorrect does not include existing R10 on Roy Boad road. 2 of the R-10s are overlying CARA and another is in landslide hazard area.

Page 47. Transportation.

How can plan be approved if transportation section is pending.

Several of the original transportation recommendations in the 2004 were not achieved in their entirety or at all.

T-1 just phase 1, phase 2 still pending

T-2 no median

T-3 no median

T-4 no median

T-6 not at all, name changed to Freight Corridor

T-7 no

T-9?

https://static1.squarespace.com/static/59af58ce37c5817a20c87a02/t/59b4260be9bdf95033f32eb/1504978454855/belfair_uga_plan.pdf

Page 48.

P-2 and P-3. Market does no longer meet Washington State Farmers Market Association requirements to be a "farmers" market.

P-4. Good idea for larger Regional Park to be sited on plateau. Port of Allyn and Salmon Center's idea of Sweetwater Park is not supported by community. Site still listed on Department of Ecology's cleanup list. Does not protect critical areas. R-10 zoning should be removed from area as Salmon center has moved and is no longer focal point of the southern development node.

P-7. Trails require lots of maintenance. Who will pay? No trail of park should be put in a landslide hazard area.

Page 50. Figure 28.

What is “add improved access at bridge in long term”? Area depicted is the US Navy RR trestle. Abandon or reroute trails, (P1) to avoid all landslide hazard areas.

Page 51.

Water quality recommendations need funding. County needs to enforce current ordinance and adopt recommendations of 2012 CARA team.(attached) **PAC should recommend.**

Page 52. Implementation Strategy

The implementation strategy is word for word the same as 2004. Successful implementation of plan depends on local interests to organize and cooperate. That organization and cooperation is not happening. **Perhaps the PAC should recommend to the BOCC that Belfair incorporate.** As I understand it the Belfair UGA is one of a few UGAs in the state that aren’t associated with an incorporated city. See second paragraph.

<https://investors.harborcustomhomes.com/profiles/investor/ResLibraryView.asp?ResLibraryID=94134&BzID=2449&G=1380>

Proposed Development Code Amendments.

Page 1.

Last bullet point.

Apply Public Facility Zoning that matches the standards contained in the Shelton UGA Public Institutional zone (MCC 17.07.710) (Alternatives 2 and 3).

I don’t think it meets the intent of the ordinance in “facilitating” managed” growth to approve rezoning existing facilities after the fact, or to apply the “Public facility” zoning that matches the standards contained in the Shelton UGA Public Institutional zone. The two UGAs are entirely different and Shelton is incorporated with their own Commission.

Page 7.

Code 17.23.130 Allowed uses: 20. Remove dry cleaner as an allowed use. Strictly prohibited in CARA.

Page 9.

Code 17.23.145 Prohibited uses. Add dry cleaners as prohibited in CARA

Code 17.23.155 (b) What is Old Beard place??? Please be more specific. The only Beard place I know of is 2 miles from UGA.

Draft Planned Action Ordinance

Page 4. "The County provided several opportunities for meaningful public involvement and review in the Belfair UGA Plan and Planned Action EIS processes, including a community meeting consistent with RCW 43.21C.440; has considered all comments received; and, as appropriate, has modified the proposal or mitigation measures in response to comments.

Please note the PAC meeting April 19 was not consistent with 43.21.C 440,3b. Agenda noted as "Public workshop", **Meeting minutes document there was no public or agencies in attendance.**

Section 2 Purpose, E. Uncertain how the objectives in this section are going to be adopted and achieved.

Page 9- (b) Concurrency. All Planned Action Projects shall meet the transportation concurrency requirements and the Level of Service (LOS) thresholds established in the Mason County Comprehensive Plan and Mason County Code. What are current established thresholds in Comprehensive plan and code.

Page 11-e (2) The County shall base its decision to qualify a project as a Planned Action Project on review of the SEPA Checklist form in WAC 197-11 and review of the Planned Action Project submittal and supporting documentation, provided on County required forms. [the County may develop its own SEPA checklist for the planned action area; however, the standard form is assumed here]

I feel the SEPA checklist review needs to be strengthened and **the PAC should recommend that the County develop its own SEPA checklist.**

Page 17. Exhibit A-option 2 makes most sense to focus development on plateau. Streams not visible on exhibit map.

Page 23. Utilities

7.

To account for increased stormwater conveyance needs due to increased impervious areas, the County shall require planned action applicants to pay their fair share of regional facilities that have been implemented in accordance with the Belfair UGA 2018 Basin Plan.

What are the regional facilities that have been implemented in accordance with that 2018 basin plan?

8.

Mason County may condition planned action applicants to pay adopted capital facilities charges for stormwater.

Change Mason County "may" to "shall".

Page 23 Transportation

9.

Connect the Romance Hill Loop Trail to land uses north of Romance Hill Road to facilitate north-south non-motorized activity in the Belfair UGA.

“Romance Hill loop trail” has not been adopted and is not referenced in UGA plan parks and trails recommendations.

Page 24. Transportation

10.

Concurrency: Transportation improvements or strategies shall be constructed to ensure that an adequate transportation system is in place to serve increased travel demands. Concurrency is defined as having a financial commitment in place to resolve the deficiency within six years. The County will not approve new developments unless the LOS standards are met. Transportation improvements identified in the Comprehensive Plan, County Transportation Improvement Program, and the Belfair Planned Action EIS are needed to meet LOS standards. Planned action applicants shall pay their proportionate share of improvements based on new PM Peak hour trips. A calculation of SEPA mitigation Fess is included in Section B-3.

The County will not approve new developments unless the LOS standards are met.

Page 25.

16.

The County Stormwater Management code (MCC 14.48.050) requires new development to meet the minimum requirements of the 2005 Edition of Ecology’s Stormwater Management Manual for Western Washington. The County requires all large developments that propose stormwater infiltration upslope of landslide hazard areas to complete a hydrogeology analysis to confirm that the proposed design would not increase the risk of landslide hazards. Stormwater facilities must be designed in accordance with the 2012 Stormwater Management Manual for Western Washington, as amended in 2014, consistent with the Mason County Shoreline Master Program (MCC 8.52).

It is confusing which manual 2005 or 2012 governs which process?

Page 25 water resources

. During final design and permitting of projects under all alternatives, project proponents will first be required to avoid and minimize impacts to wetlands and streams through design measures and best management practices. Where impacts are unavoidable, project proponents will mitigate them in accordance with applicable federal regulations, local critical areas ordinances, and permit requirements. See Table 2.

No mention of CARA needs to be.

Page 28.

#29.

MCC Chapter 14.46 includes the purpose, description, and regulations associated with the County's storm and surface water utility. The utility is responsible for flooding management, water quality improvement, and protecting aquatic habitat. Currently, **there are no annual stormwater fees associated with the utility**. Assessments for fees may become necessary to support the utility and its functions, and a priority list of projects will be developed before any fee or assessment is required (MCC 14.46.040).

County storm water utility, annual storm water fees need to be adopted. PAC should recommend.

Page 29.

1a. Based on the share of trips in Section (3)(a) and mitigation in the EIS the cost and fee per trip has been calculated. Unless amended, **or replaced with a transportation impact fee**, mitigation fees consistent with the proportionate share of costs shall be applied to planned action applications. The proportionate share of costs of the Planned Actions shall be determined based on their proportionate share of trips identified in Section 3.D(3) of this ordinance and this section.

PAC should recommend a transportation impact fee.

Sincerely,

Ken VanBuskirk

NE 61 Davis Farm Road

Belfair, Wa 98528

To Randy Neatherlin, Chair, Mason County Board of County Commissioners

From Bob Hager, Lead, Informal CARA Team

Date March 26, 2013

Subject Status and Recommendations on Mason County Critical Aquifer Recharge Areas (CARAs) Ordinance

In response to your request, I am pleased to report that the informal group you asked me to convene has finished its recommendations on Mason County Critical Aquifer Recharge Area(s) and ordinance.

The members of the informal team were Pat Vandehey, Terri Thompson, Constance Ibsen, Ken VanBuskirk and myself. The results are the product of the team members' review of existing materials, investigations and, in particular, the substantial information compiled by Terri Thompson and Pat Vandehey.

MASON County Critical Aquifer Recharge Area Ordinance Status and Recommendations

OVERVIEW AND STATUS

Mason County Resource Ordinance, Section 17.01.080 (MCRO) provides the standards for Critical Aquifer Recharge Areas (CARAs) in accordance with the Growth Management Act ([Attachment 1](#)). The GMA defines CARAs as “areas with a critical recharging effect on aquifers used for potable water.” CARA ordinances are to protect the aquifer by ensuring a clean supply of freshwater as it enters the ground and the aquifer. It is generally accepted that protecting public drinking groundwater supplies from contamination is essential for human health. Clean-up costs can be prohibitive or not possible.

Mason County CARA locations are designated as Class I (Extremely Susceptible) Class II (Highly Susceptible), Class III (Moderately Susceptible) or Class IV (Low Susceptibility). CARAs are shown on 25 USGS base maps with boundary lines drawn by retired volunteer geologist consultant Gordon Adams (now deceased). In a March 29, 1999 letter to Robert Fink, Mason County Growth Management Planner, Mr. Adams describes the methodology and references he used ([Attachment 2](#)).

Mason County Planning uses these maps when reviewing permit applications. Mason County planners often have difficulty determining if a particular property is located on a CARA due to the width of the hand drawn lines and the scale of the maps. In addition, there are some areas where the lines do not meet ([Attachment 3](#)). Although developed at the same time by Mr. Adams, the City of Shelton and the Mason County CARA maps are exactly opposite for Class I and II aquifer classifications. Interestingly, the online Mason County and City of Shelton Comprehensive Plans CARA maps show no Class III aquifers. The Gordon Adams’ maps show many Class III CARAs. Also, the Gordon Adams’ CARA map shows a Class II CARA in downtown Shelton ([Attachment 4](#)), which is missing from the City of Shelton CARA and Mason County CARA maps on their respective websites ([Attachment 5](#)).

Ecology was unable to provide a list of facilities on Mason County CARAs that it permits or monitors because of the limited information on Mason County CARA locations. Ecology did provide a list of 495 facilities in Mason County that it has permitted or tracked under various Ecology programs. Using existing Mason County CARA maps, a limited review by the CARA team determined that a large number of these facilities are on CARAs. For example, of the 102 known sites around the Belfair area in the Ecology database, 37 of the listed facilities are on the Union River Class II CARA. There are 55 leaking underground storage tanks in Mason County for clean up under the oversight and review of Ecology ([Attachment 6](#)). Ecology is currently unable to determine if any of these sites are located on a CARA due to the lack of sufficient definition in Mason County CARA mapping.

Mason County does not have a database of facilities requiring permits located on CARAs. The MCRO, [Section J1](#), requires that a “*database identifying all pre-existing prohibited uses or uses requiring a permit is maintained.*” For these pre-existing facilities the MCRO, [Section C](#), requires the County to “*contact the owner and develop a compliance plan and time line to bring the pre-existing use into compliance to the highest degree practicable and which provides an acceptable low risk to the aquifer.*” There is also no database of abandoned facilities on CARAs.

On-Site Septic Systems (OSS) require mandatory operation and maintenance if located on a CARA (MCRO, [Section G](#)). This is also reflected in the 2007 Mason County *On-Site Management Plan*. ([Attachment 7](#)). There is no OSS countywide database for property parcels on CARAs. OSS operations and maintenance compliance in Mason County is generally not enforced.

There are indications that environmental contamination in Mason County is impeding development:

According to the 2002 CDM *Brownfields Assessment* (Attachment 8) in the early 1990's Hokushin, a manufacturer located in Japan, planned to build a \$70 million fiberboard manufacturing plant employing 120 on 70 acres in John's Prairie. During the *Phase 2 ESA* they encountered contamination in the ground water exceeding drinking standards. The source of the contamination was unknown and is still unknown. The manufacturer decided against a plant here and constructed an identical plant in Australia. In 1998, Express Pipe and Precast leased a parcel in John's Prairie to start a concrete precast manufacturing operation. They encountered large quantities of buried wood waste for which that the Port of Shelton was not aware. The company terminated the lease because the large quantity of wood waste made the development uneconomical and no agreement on how to dispose of the wood waste was reached.

CARA TEAM CONCLUSION:

The CARA team concludes that sufficient and adequate ordinances are in place to protect CARAs; needed is ordinance implementation and enforcement.

RECOMMENDATIONS

Immediate

Develop GIS CARA parcel layer: Direct and give authority to Mason County GIS staff to develop a parcel level layer for Mason County CARA locations based on the 1999 CARA maps prepared by Gordon Adams. John Stormon, hydrogeologist with Washington Department of Ecology, has offered to assist Mason County GIS staff.

This is the most urgent of all the recommendations, as it is needed to identify properties that are on various CARAs and to implement the other requirements in the Ordinance. Ecology also needs this GIS layer to identify facilities it permits and tracks within the CARAs.

The discrepancies between County CARA maps and Shelton CARA maps need to be reconciled. The maps encompass the same CARA areas; yet identify Class 1 and Class II exactly opposite.

Review and identify Class III CARAs on the original Adams' maps and add to the GIS layer.

In addition, the County must develop an ongoing process to refine the GIS layer with DNR, USGS geological information, wellhead data and various hydrogeologic studies prepared for individual projects.

Concurrently

Provide for a Critical Areas **Compliance staff position**. This position needs to be independent of Mason County department of Community Development, Health and Public Works. The job description would include the tracking, monitoring and enforcement of regulations concerning Critical Aquifer Recharge Areas. Possibly, Ecology's Hazardous Waste Program monies could be tapped to provide some support for this staff position and build in-house capacity

Ongoing

Data Base(s) Using the CARA GIS parcel layer:

Develop a comprehensive database of active existing facilities and operations on CARAs that have been permitted **Post the 1999** CARA Ordinance adoption that are either a ‘Prohibited Use’ or require an ‘Environmental Permit.’”

Identify and document sites required to have a hazardous waste number (WAC 173-303).

Inspect for compliance; initial inspection and subsequent inspections “not less than one every two years.” (MCRO, Section J 1 and 2)

Assure that employees at the facilities are aware of and are following the required procedures for being located on a CARA.

Determine and implement compliance procedures/regulations, including enforcement, timelines and penalties.

Develop a database of active facilities and operations on CARAs that existed prior to 1999 CARA adoption (Pre-existing uses) that are either a ‘Prohibited Use’ or require an ‘Environmental Permit’ (Attachment 1, MCRO, Section J1).

In accordance with MCRO, Section C, for each facility or operation mentioned above: *“...contacting the responsible party, develop and implement a compliance plan and timeline, bringing the operation into compliance to the highest degree possible, and provides an acceptable, low risk to the aquifer.”*

Develop a database of abandoned facilities or operations in Mason County, located on CARAs listed as prohibited under the Ordinance. Ecology previous permits and local residents’ knowledge are sources to locate the sites. For each site develop a plan for monitoring and/or removal.

Develop a database for active and inactive surface mining (MCRO, RE-516, A–F (Attachment 9)).

Develop a database of OSS on CARAs, flagging the property records for requiring mandatory Operation and Maintenance (Attachment 1, MCRO, Section G and the *On-Site Management Plan* (Attachment 7)).

Notify the homeowners that are located on CARAs that operation and maintenance of OSS is mandatory to protect aquifer and drinking water sources.

Develop a process of coordination between the County, City and Ecology for the permitting and monitoring of facilities on CARAs.

Request that this report be made available to all Mason County Department Heads.

Attachments:

Four Examples of Sites Impacting CARAS, Attachments (9), Addendum (prepared by T. Thompson)

The following are some examples of past or current operations, which may be or have been, adversely impacting soil and water quality.

Belfair Sewer Project, Belfair UGA

Contaminated soil was encountered during construction of the Belfair sewer and resulted in cost overruns. This area is in the Union River Class II CARA in the Belfair UGA. A GIS parcel layer of pre-existing and/or abandoned permitted or prohibited uses on the Belfair CARAs could have assisted design engineers to locate sewer transmission lines into areas with less likelihood of encountering contaminated soils. Unfortunately, contaminated soil was encountered where there are known pre-existing or abandoned facilities including, at least six gas stations/auto repair facilities, two dry cleaners, and two boat repair facilities --all within 1/3-mile radius.

Goose Lake/Sanderson Airfield

Department of Ecology Agreed Order No. DE99TC-S260, 2001, states:

The Goose Lake Site is located approximately 0.3 miles west of Shelton. The Goose Lake Site and nearby upland property were used as a disposal area for Rayonier's waste from a calcium sulfite pulp mill. Thousands of tons of waste sulfite liquor were deposited from May 1931 to 1934 into the Lake and from 1934 into a series of upland disposal lagoons. Goose Lake sediment samples demonstrated extremely high concentrations of sulfide. Analysis for total metals indicates that the sediments are contaminated with mercury. Polychlorinated biphenyl (PCB) was also present in the sediment. Analysis of groundwater in the vicinity of the landfill indicated the presence of chromium above the Method A Cleanup Level. Contamination with arsenic above the Method A Cleanup Level was found in all three monitoring wells. Soil samples in the vicinity of the former disposal ponds indicated that arsenic concentrations were above the Method B Cleanup Level. Chromium has also been detected in soils and groundwater at Sanderson Air Field which is located in the Port of Shelton just north of Goose Lake.

Leaking Underground Storage Tanks (LUSTs) – Example, Belfair UGA

According to Ecology, there are 58 known leaking underground storage tanks (LUSTs) in Mason County. Example, **Facility Site 81456814 MC GWIMONT** at NE 22604 HWY3, Belfair. It is identified in the Ecology Toxics Program as Nbr. 6547. It is located on the west side of Highway 3 at the intersection with Highway 106. The start date for the Ecology effort is 8/1/1973. There is no further information or end date provided. Although this is not in the Union River Class II CARA, it is within the Belfair Water District Wells 1 and 2 well head protection buffer zones.

Shelton Landfill (C Street Dump)

This landfill is located on a CARA west of Highway 101 near the end of C Street. It is unlined and unmonitored. It has been listed under Ecology's Toxics program as a State Cleanup Site since 1988. A large amount of municipal and hazardous waste is buried there. It is also a site that Simpson Timber Company deposited dioxin ash mixed with sewer sludge. Currently, Miles Sand and Gravel, also located on the CARA, has removed a great deal of hillside near this old landfill. The 1987 final dioxin study report by CH2M Hill stated: "...the lowest portion of the depression is not on City property and there is a potential for movement of contaminated material to lower elevations within the depression although two berms would have to be breached before surface movement would occur." There is a potential for leaching from hazardous material into groundwater and into Goldsborough Creek.

Mariah Frazier

From: Planning
Sent: Monday, June 7, 2021 3:20 PM
To: Mariah Frazier
Subject: FW: Belfair EIS Comment

From: Chris Wilder <cwilder@masontransit.org>
Sent: Thursday, June 3, 2021 12:49 PM
To: Planning <planning@co.mason.wa.us>
Cc: Trina Gwerder <tgwerder@masontransit.org>
Subject: Belfair EIS Comment

Belfair EIS Comment

MTA has concerns about the roundabout's proximity on Hwy 300 / NE Clifton Ln / NE Old Belfair Hwy and Roy Boad / Clifton Ln that may create safety concerns at our bus stop along Bill Hunter Park. Our Buses are large and cumbersome, taking extra time and space to safely merge into traffic. With the roundabout's proximity and steady flow of traffic, this may cause close calls or collisions with our Buses as they try to merge. This intersection is very busy, and other drivers can be very impatient.

Our other concern is the crosswalks in these roundabouts. There is a lot of pedestrians in this area that will be needing to safety cross the street to get to our bus stop. We would like to ask that traffic lights and warning lights for the crosswalks are put in at this intersection instead of a roundabout.

Thank you.

Chris Wilder (MTA)



Skokomish Indian Tribe

Natural Resources Department (360) 877-5213

N. 541 Tribal Center Road

Fax (360) 877-5148

Skokomish Nation, WA 98584

June 7, 2021

Kell Rowen, Community Development Administrator
Mason County Community Services
615 W Alder Street
Shelton WA 98584
(360) 427-9670 x 286
planning@co.mason.wa.us

Subject: Skokomish Tribe Comments: Mason County Belfair Urban Growth Area: Draft Environmental Impact Statement (DEIS); April 2021

Dear Ms. Rowen,

Thank you for the opportunity to comment on this Draft EIS.

The Skokomish Tribe (Tribe) and reservation are located primarily within the Skokomish River Basin. The basin is part of the Tribe's much larger usual and accustomed (U&A) gathering, fishing and hunting area within the Hood Canal Watershed. These waters are tributary to the waters of Puget Sound in Washington. The Tribe is heavily dependent on shell-fish gathering and fin-fishing for salmon within our U&A, not only for cultural and subsistence use, but also for commercial purposes. The Tribe has senior water rights within our U&A. This includes the Belfair UGA planning area in the (Southern) Hood Canal Sub-Basin within WRIA 14. The planning area is also on western edge of WRIA 15, and involves the water resources of four tribes, including the Skokomish, Squaxin, Suquamish, and Port Gamble S'Klallam (PGST) Tribes.

Both water quantity and quality are primary components of critical habitat. It is vitally important that water quantity is protected for the restoration of biodiversity and the recovery of ESA listed species within the Union River Watershed. It is the Tribe's position that far too much pressure is already placed on this watershed by land development within Kitsap and Mason Counties, including the following:

- Belfair is pumping groundwater in the Skokomish U&A (Union River) and possibly Coulter Creek (Squaxin U&A).
- Bremerton withdraws surface water from the Skokomish U&A (Union River).
- Bremerton production wells withdraw groundwater from an aquifer that likely connects to the Union River, Gorst and Parish Creeks (PGST and Suquamish U&A).
- Bremerton pumping may also affect the Coulter Creek (Squaxin U&A).

The Draft EIS states in the Fact Sheet (Page 5) under the *“Proposed Action and Alternatives”*; that:

“Belfair may soon experience a rapid increase in growth. The County proposes to update the Belfair UGA Plan, adopted in December 2004, and refresh the vision. The County also seeks to Planned Action ordinance for the Belfair UGA to facilitate growth that supports a community-based vision for Belfair. Amendments to the Mason County Comprehensive Plan and Belfair zoning and environmental regulations would be needed to implement alternatives.”

If there is more growth in Belfair, then the increased pumping of Belfair area wells is likely to specifically affect the Union River, while rural dispersed growth would affect multiple creeks as well as the Union River. Has the County done any hydro-geologic analysis to ascertain impacts with different well pumping scenarios?

The DEIS narrative states that *“environmental regulations would be needed to implement alternatives.”* Based on our review of Section 3, *“Environment, Impacts, and Mitigation”*, with specific reference to 3-10, *“Water Resources”*, the Tribe’s position is that this section, while it may be able to show that sufficient *“legal”* water rights exist to facilitate growth, fails to mention Tribal senior water rights issues, thereby minimizing or even failing to recognize *“Tribal”* senior water rights. Additionally, the narrative fails to connect *“legal”* water rights” to the physical availability of water in fact. The County has not produced any definitive surface and/or ground water studies to provide hydro or hydro-geologic information that evidences or shows that there is physically enough water resource availability to facilitate either Alternative 2 or Alternative 3. Instead the County has provided estimates based on assumptions about *“legal”* water rights. This does not replace hydrologic or geo-hydrologic evidence, and is simply insufficient in order to develop effective environmental regulations and mitigation. The Tribe is obligated to protect our senior water rights. It is our position that studies need to be conducted to demonstrate this evidence.

Additionally, on Page 9, the DEIS states that:

“Mason County has also coordinated with tribes and agencies with jurisdiction and environmental expertise and service providers in the preparation of the current DEIS”.

To our knowledge, and with exception of this notification, the Skokomish Tribe has not been consulted regarding the development of this draft EIS, either by any of the consultants listed under *“Authors and Principal Contributors to the EIS”* on Page 8, or by Mason County.

Thank you for the opportunity to comment. If you have any questions or concerns regarding these comments please contact Dana Sarff, Environmental Planner, at 360-877-5213 Ext 2201 or at dsarff@skokomish.org

Respectfully,



Joseph Pavel
Director of Natural Resources
Skokomish Tribe



SQUAXIN ISLAND TRIBE

June 7, 2021

Kell Rowen
Community Development Administrator
Mason County Community Services
615 W Alder Street
Shelton, WA 98584

Dear Ms. Rowen,

These are comments on the Mason County Belfair Urban Growth Area Draft Environmental Impact Statement | April 2021.

Our primary concerns lie with Mason County's plans for the Belfair Water Reclamation Facility (WRF). The mere existence of this facility is very positive, and there are a number of positive ways to use the WRF's reclaimed water. Still, Mason County's plans to expand the WRF are so substantial that any expansion alternative will cause a change to groundwater, surface water, and water quality of the Coulter Creek and its tributaries, which are Treaty Resources of the Squaxin Island Tribe.

According to Washington State Department of Ecology's [PARIS Database](#), the Belfair WRF's outflow to pond and sprayfields ranged from about 0.04-0.15 million gallons per day (MGD) in 2020. The WRF has accumulated violations of its permit, including for Nitrogen ([PARIS Database](#)). According to the draft EIS, the WRF is permitted to 0.32 MGD. Alternatives 1, 2, and 3 in the draft EIS could result in flow to the plant approaching 0.251, 0.727, and 0.864 MGD respectively (page 3-113). Furthermore, from Mason County's draft General Sewer Plan, the County anticipates increasing sprayfield capacity from 0.125 MGD to 0.237 MGD by 2026. We understand from this draft EIS that Mason County plans to receive wastewater from the City of Bremerton's Puget Sound Industrial Center.

It is clear that reclaimed water application into the Coulter Creek watershed will increase significantly.

Please quantify in the EIS:

1. The current nitrogen load released through the pond and sprayfield into the watershed.
2. How much water will be sent from the Puget Sound Industrial Center?

3. The future nitrogen load released through the pond and sprayfield into the watershed under Alternatives 1, 2, and 3.

Please address in this EIS:

4. What are the County's plans to decrease the number of violations at the Belfair WRF and improve treatment?
5. What are alternatives to only expanding the sprayfield? Forestry irrigation is a way to use wastewater, but forestry in Western Washington does not require irrigation. While improving wastewater treatment, could the WRF fully infiltrate reclaimed water in new locations or reuse it inside the Belfair UGA?

The draft EIS makes an unfounded assumption that because there will be additional development in the Belfair UGA, additional permit-exempt wells will not be drilled, and owners of existing permit-exempt wells will connect to the Belfair Water District Service. We know from experience that although a public water system may be available, homeowners may not connect to it due to additional cost.

Please quantify in this EIS:

6. The number of rural residential parcels that will not have permit-exempt wells versus the number of newly built households that will connect to the Belfair Water District 1 system.
7. The number of existing households with permit-exempt wells that are expected to connect to the Belfair Water District 1 system, and how it can be assured that they will do so.
8. Different impacts to groundwater (and therefore Union River and Coulter Creek) that result from additional pumping in Alternatives 1, 2, and 3 of the draft EIS.

The Belfair WRF reclaimed water source exists in the middle of multiple watersheds, jurisdictions, and Tribal Usual and Accustomed Areas (U&A's):

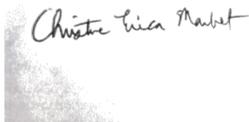
- Belfair Water District is pumping groundwater in the Skokomish U&A (aquifers connected to the Union River) and possibly affects aquifers connected to Coulter Creek (Squaxin U&A).
- Bremerton withdraws surface water from the Skokomish U&A (Union River).
- Bremerton production wells withdraw groundwater from an aquifer that connects to the Union River and Gorst and Parish Creeks (Port Gamble S'Klallam and Suquamish U&A). Bremerton pumping may also affect the Coulter Creek (Squaxin U&A).
- Bremerton and Mason County are developing an agreement to remove water, in the form of wastewater, from the Puget Sound Industrial Center (Port Gamble S'Klallam and Suquamish U&A) to Coulter watershed (Squaxin U&A).
- The City of Port Orchard is looking for additional water rights, which may impact Coulter Creek.

- WRIA 15 just went through a planning process for rural wells and offset of their impact. Reclaimed water is a possible offset. The WRIA 15 group never heard from Mason County about the Belfair Water Reclamation Facility.

Please address in this EIS

9. How Mason County will inform and include all stakeholders in its plans and agreements around reclaimed water?
10. How Mason County will identify and chose alternatives for reclaimed water that improve water quality and streamflow for streams and rivers most impacted by groundwater pumping from expanded development in the Belfair Urban Growth Area.

Sincerely,

A handwritten signature in cursive script that reads "Christie Erica Marbet". The signature is written in dark ink on a light-colored background.

Erica Marbet

Water Resources Biologist

Squaxin Island Tribe



Hood Canal Coordinating Council

Jefferson, Kitsap & Mason Counties; Port Gamble S'Klallam & Skokomish Tribes

17791 Fjord Drive NE, Suite 118, Poulsbo, WA 98370

June 1, 2021

Kell Rowen, Community Development Administrator
Mason County Community Services
615 W Alder Street
Shelton, WA 98584

RE: Hood Canal Coordinating Council Staff Review Comments on the Belfair UGA DEIS April 2021

Dear Kell,

The Hood Canal Coordinating Council staff has reviewed the Mason County Belfair Urban Growth Area DEIS, April 2021 and would like to provide the following comments.

Comment 1: See Wetlands pages 3-14, 3-15 and Exhibit 3-4 Wetlands and Streams

There is a large wetland occurring on Irene Creek east of the Old Belfair Highway which is partly contained within the 17 acre wetland mitigation site of the Hood Canal Coordinating Council's In Lieu Fee Program. We have estimated this wetland to be at least at 24 acres based on area topography, aerial imagery review and field survey of some parcels in the area. This is a Category 1 wetland and occurs from south of the Irene Creek culvert crossing at Old Belfair Highway north and east to McKnight Road. North of McKnight Road a wetland with an open water pond also occurs. These two wetlands are hydrologically connected by Irene Creek and hyporheic flow. This wetland is not accurately depicted on Exhibit 3-4 Wetlands and Streams.

Comment 2: Is the UGA boundary correct at the circled location of Exhibit 3-4, looks different from previous Exhibits? Also verify boundary on Exhibit 3-7.

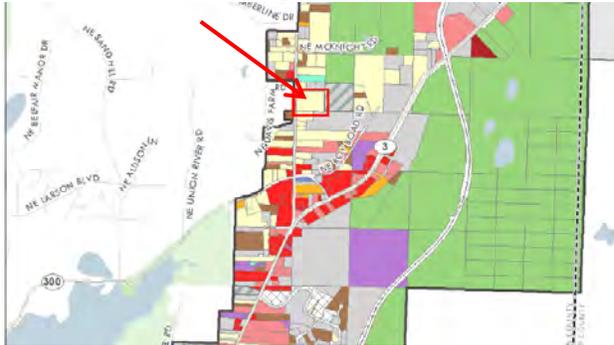


Comment 3: Exhibit 3-10. Existing Land Use Acreages

Undeveloped Public/Conservancy lands should be separated out from undeveloped only lands. Public and conserved lands have restrictive land uses placed on title and are not typically available for development so should not be included with unrestricted undeveloped land.

Comment 4: Exhibit 3-11 Existing Land Use Map

Incorrect land use for parcel 12329-11-00040 (see red arrow on figure excerpt below) – conserved wetland mitigation property.



Sincerely,

Patty Michak

Patty Michak
Mitigation Program Manager
Hood Canal Coordinating Council

Mariah Frazier

From: Stephanie Neil <davisfarmflowergirl@gmail.com>
Sent: Tuesday, June 1, 2021 6:49 PM
To: Planning
Subject: Fwd: Belfair UGA Draft EIS comments

I wanted to clarify what I wrote in my earlier email regarding cultural resources. I'm really happy to see the County considering additional measures to identify and protect cultural resources. I think it is a good idea to conduct more surveys in high probability areas before development. I don't think the desktop reviews will be that useful because they are just gathering background information, there is no fieldwork. The statewide predictive model is a useful tool but it has limitations. My main question is who would be determining if a survey was necessary - DAHP staff, County staff, or other?

Thank You,
Stephanie Neil

----- Forwarded message -----

From: **Stephanie Neil** <davisfarmflowergirl@gmail.com>
Date: Tue, Jun 1, 2021 at 6:22 PM
Subject: Belfair UGA Draft EIS comments
To: <planning@co.mason.wa.us>

Thank you for taking comments on the Belfair UGA Draft EIS.

I have been a Belfair resident for about 32 years and it's a very special place to me. I grew up in Belfair, left in 1996 for university and to start my career, and returned when I had my first child in 2007 because I wanted to raise my kids here.

I looked at the Draft EIS and also some of the meeting notes and have the following comments.

I see Belfair as a crossroads, vacation destination, and bedroom community to Bremerton and beyond. I personally commute from Belfair to Seattle three days a week via the ferry service from Bremerton and Southworth and I'm one of many. Belfair is on a major route north-south and also a jumping off point to summer cabins and recreation on Hood Canal, Tahuya Peninsula, Mason Lake, and the Olympic Peninsula.

I know there will be increased growth and we need to plan for it. I'd also like to see improvements in transportation to handle increased numbers of people, and the protection of important natural resources.

I prefer Alternative 2 or a new Alternative with pieces from Alternative 3, but not the entire thing. I think the growth should be focused near SR3 or the new SR3 Freight Corridor. I think it will be easier to improve the existing infrastructure on SR3 and design SR3 Freight Corridor infrastructure to handle the increased growth.

I do not think it would be wise to rezone the portion of the UGA in the Newkirk area. The Union River Valley Critical Aquifer Recharge Area needs to be protected and as noted in the Draft EIS the Union River is a shoreline of statewide significance and already has issues with bacteria, dissolved oxygen, and temperature levels. Also noted were poor spawning conditions due to runoff. Efforts should be made to protect the Union River and its major tributaries.

I own the property at 301 NE Old Belfair Hwy. I noted the UGA includes that parcel (it sticks out there) but the zoning has been changed to Rural Residential. Irene Creek flows through this property. The UGA boundary should be redrawn

straight along Old Belfair Hwy at this location. The property at 381 NE Davis Farm Rd. was also changed to Rural Residential and borders Irene Creek but the UGA boundary also goes around this property. It should be redrawn here as well.

I think there is additional acreage in public/conservancy than is shown. The property at 360 NE Old Belfair Hwy is under a conservation easement. The 10 acre to the east of this parcel is marked but not the 7 acre along OBH.

I do think adding more growth to the northern area of the UGA near the SR3 and SR3 Freight Corridor by changing to a MP-MU designation is a good idea. This area is better suited for development and would be closer to the main travel routes.

The Draft EIS noted the intersection at Old Belfair Hwy/ SR 300/ Clifton Ln is very busy and already poorly functioning. It would not be wise to add increased traffic coming from the Newkirk direction, even if the intersection is improved.

I don't think the maps have all the streams and wetlands accurately mapped. I think there are likely additional wetland areas to the east of SR3 near the center of Belfair and some streams do not appear to be in the correct locations. I think better data is needed to properly plan and there may need to be additional areas that are set aside for wetland preservation and/or mitigation.

I would like to see a connection from the SR3 Freight Corridor to SR3 close to the intersection of SR3 and SR106. I think this would make a more logical connection than the one planned at Romance Hill. Maybe this would be harder to engineer at the top of the hill, I don't know enough about the details of the land, but it seems like it would make a much better connection and keep the people travelling down SR106 from going through downtown.

I like the idea of a roundabout at the SR300/ OBH/ Clifton Lance intersection. I don't understand the need for another roundabout at Roy Boad Road.

I really like the idea for increased bicycle and foot trails, especially the one along SR300. I regularly ride my bicycle and run on roads and many in Belfair are very dangerous. The section from QFC to Sand Hill Rd is one of the worst. It would be great to have more of the parks tied together. This connection along SR 300 towards Belfair State Park and towards the Sand Hill park is much needed.

I am a professional archaeologist and familiar with the secure side of WISAARD. I have some questions regarding additional cultural resources requirements. Who would be reviewing and determining if a cultural resources desktop review or survey is necessary? Would that be done by County staff? It seems like that would require a lot of additional work. I don't see the usefulness in having desktop reviews for the moderately low and moderate areas. I like the idea of adding standard inadvertent discovery language, but I think the other proposed changes might be requiring more work than is really necessary to protect cultural resources.

Thank you for your time,
Stephanie Neil