

From: [Vanderlip, Richard L \(DFW\)](#)
To: Ann.Weckback@lewiscountywa.gov
Cc: [SEPADesk2 \(DFW\)](#); [Grabski, Mark J \(DFW\)](#)
Subject: Comment Response - DNS 15-023: SPEARS UNIT MILL SITE PROJECT - Lewis County
Date: Tuesday, April 21, 2015 10:43:17 AM

Lewis County Public Works,

Thank-you for responding / commenting on our SEPA checklist. We appreciate your concerns. In responding to the first comment I think I should start by clarifying the scope of the project. There are two parts to this project. The first part addresses safety and liability by filling the old foundations thus removing the possibility of a fall hazard. The second part of the project is using additional fill material to provide a suitable substrate for planting vegetation. These soils will be stockpiled where they will be graded to a level approximately 12 to 24 inches thick tapering to the edges. The locations of where the fill and grading will take place can be found on the map titled "Project Map / Site Plan" included with the SEPA checklist. The materials utilized for this project will come from other agencies in the course of doing their projects such as ditch cleaning and slide removals. It is unknown at this time how much and how fast the materials will be provided so the intent is to stockpile the materials and grade them out periodically. The materials will be protected from erosion while stockpiled with straw materials distributed over the piles and then grass seed will be hand broadcasted once they are graded out. The agencies will be instructed to keep us apprised of when dumping is occurring so that the material can be monitored and appropriate action taken to implement erosion control measures. The dump sites surfaces are composed of concrete slabs or highly compacted soils that will support heavy trucks even when wet.

To address the second comment, WDFW acknowledges that the project is located within the defined 100 year flood level. The site is also perched several feet above the surrounding landscape. The site was constructed to elevate the mill above normal flooding levels. That being said, best management practices for soil stabilization will be implemented.

Again thank you for commenting on our checklist.

Richard L. Vanderlip

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From: Ann Weckback [<mailto:Ann.Weckback@lewiscountywa.gov>]
Sent: Monday, April 20, 2015 11:23 AM
To: Karen Witherspoon
Cc: Tim Elsea; Bell, Steven W (DFW)
Subject: RE: DNS 15-023: SPEARS UNIT MILL SITE PROJECT - Lewis County

Karen,

My comments include the following:

A.7. states the initial project is to fill the old mill foundations and stockpile fill material. Eventually, the stockpiled material will be graded and planted with grass and shrub species.

B.1.h. states the foundation fill will be contained within the concrete foundation walls and the fill utilized to create plantable soils will be stabilized with erosion control measures such as planting or mulching.

If all materials are to be placed within the concrete foundation walls and eventually graded, materials should be referred to as fill rather than stockpile materials. If materials will be placed outside of the concrete foundation walls and stockpiled before being placed inside the concrete foundation walls best management practices such as the covering of exposed earth with soil or the planting of unworked soils within a 2 (wet season) to 7 (dry season) day time period should be implemented.

B.c.2. states waste materials could not enter ground or surface waters.

As the entire site is within the 100-year floodplain there is an opportunity for waste materials to enter surface water even if they are being placed within the concrete foundation walls. Additionally, once the area has been filled to existing ground levels waste (eroding soils) could enter surface waters if best management practices are not implemented.

Thanks,
Ann Weckback
Environmental Planner
Lewis County Public Works
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