

Legislative Campus Modernization Project (LCM)
LCM Non-Project SEPA Checklist Comments and Responses
January 2023

Overview

Overview Responses to comments provided in this attachment address environmental issues raised during the public comment period for the draft LCM Non-Project State Environmental Policy Act (SEPA) Checklist. The Department of Enterprise Services (DES) released the draft environmental review for comment on August 19, 2022. The 30-day comment period ended on Sept. 19, 2022.

A total of 151 comments were submitted. Responses are provided for each comment in the following sections. They are intended to provide clarification and refinement of information presented in the Draft Checklist.

Some issues raised are outside the scope of a SEPA checklist, which is to evaluate potential environmental impacts (and benefits) of the project and to inform decision-makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. Comments on issues that are out of scope for the environmental review are noted as “does not fall under the purview of the SEPA process.”

Table of Contents

Overview	1
General.....	2
Earth.....	7
Air.....	7
Water	10
Plants.....	11
Animals.....	15
Energy and Natural Resources	15
Environmental Health	15
Land and Shoreline Use	18
Housing	23
Aesthetics.....	23
Light and Glare	25
Recreation	25
Historic and Cultural Preservation	25
Transportation	27

Public Services.....	34
Utilities	34

General

1. **South Capitol Neighborhood Association (SCNA) Comment:** The LCM defines the greatest change to the State Capitol Group since 1911. Change of this magnitude not only requires appropriate oversight but adherence to the 2006 MP and 2009 WCHLPP.

LCM Response: The documents referenced are planning documents; the principles are important but are not requirements for future development. Proposed LCM subprojects conform to several principles in the 2006 and 2009 master plans while also complying with legislative requirements Section 1111 of the 2021 Capital Budget SHB 1080 SL, Section 4, Part (b).

2. **SCNA Comment:** Also included in the 2006 MP is the State’s commitment to follow the U.S. Secretary of the Interior’s Standards for Historic Preservation, which include standards and guidelines on not just materials and building features, but also setting and relation to other structures and the landscape, and sustainability. These planning and design principles are foundational to Campus planning and provide a necessary framework to avoid a piecemeal process that would be detrimental to the preservation of the beauty and legacy of our State Capitol. All new structures should be addressed through the lens of the Campus as a whole, recognizing the connectivity of its parts.

LCM Response: See General response 1 (above).

3. **SCNA Comment:** A prime example is the proximity of Newhouse replacement to the State Capitol Group that was designed to appear as a whole with the Capitol Dome the focal point. Surrounding buildings were painstakingly created to achieve critical proportion. Though the height of Newhouse aligns with that of Cherberg, the scale and placement of Newhouse disrupts this Wilder & White original design.

LCM Response: The height of the Newhouse Building Replacement structure will be lower than its historic neighbors to maintain the hierarchy of the original grouping of buildings while meeting the 2006 Master Plan goals and legislative requirements. Given gradual evolution of state government space requirements, the Newhouse Building Replacement is a later piece in the sculptural composition of the original Wilder and White design, as was the original Pritchard Building. With the rehabilitation and expansion of Pritchard, another piece is added to the campus plan in response to current space requirements, but heights of new buildings will be lower than those of historic buildings.

4. **SCNA Comment:** Unlike Pritchard, it dominates rather than supports the neighboring Capitol Group... (continued in General response 5 below)

LCM Response: The historic geometric proportions, spacing of bays, and vertical elements of the historic campus have been studied and translated into the scale and proportions of Newhouse Replacement to ensure the design relates harmoniously with the historic West Campus buildings. Since the project is located within the South Edge Sub Campus Plan Area, the organizational axes of the structure and site are subordinate to the original axes of the Capitol Group but add reinforcing mass along the south side of Sid Snyder Avenue SW. The original Wilder and White site plan must evolve as state government requirements change; contemporary facility usage necessitates revisions on Opportunity Sites Five and Six.

5. **SCNA Comment:** ...and unlike the Sommers building, the entrance area is not camouflaged by large trees to at least soften its massive presence.

LCM Response: Architecturally it is not safe to "camouflage" main entries; LCM intent is to continue the existing tree plan of Sid Snyder Avenue SW with appropriately scaled landscape elements while making visual access to the building's main entry clear and safe for pedestrians and vehicular traffic.

6. **SCNA Comment:** A three-dimensional architectural model would be extremely useful to help judge the implications of this concerning relationship.

LCM Response: Models of existing and proposed buildings were not funded in LCM Project budget. However, the Department of Enterprise Services and their consultants will continue to share graphic representations of proposed buildings in stakeholder meetings.

7. **SCNA Comment:** SCN's positions relating to the nexus between the residential neighborhood and the south edge of the Campus are grounded in the critical set of comprehensive planning principles outlined below: 2006 Master Plan: Principle 5 – Design.

LCM Response: Comment noted.

8. **SCNA Comment:** Site new buildings as part of the existing open space/landscape pattern.

LCM Response: The figure/ground relationship of existing and new buildings on the south edge of the Capitol Campus has been studied. Massing and configuration of the Newhouse Building Replacement reflect the goal of reinforcing the south urban "edge" of Sid Snyder Avenue SW while locating the symmetrical, main entry on the west half of Opportunity Site Six with focus on Sid Snyder Avenue SW and the Great Lawn to the north. The Pritchard Rehabilitation/Expansion is based on the existing footprint of the original Pritchard Building and its relationship to the forecourt and axial relationship to Legislative, Cherberg, and O'Brien buildings. Current designs recognize and respect the formal placements of the original Wilder and White design while accommodating required expansions and replacements on both Opportunity Sites Five and Six.

9. **SCNA Comment:** Protect view to the Legislative Building, including South Capitol Neighborhood.

LCM Response: While accommodating proviso-required expansion and replacement of existing facilities on the Capitol Campus, views to the Legislative Building are available on three sides (north, east, and south) across significant amounts of open space.

10. **SCNA Comment:** Maintain and enhance major view corridors into the Campus.

LCM Response: View corridors are maintained from Capitol Way South, Sid Snyder Avenue SW, 15th Avenue SW, 16th Avenue SW, and Water Street SW.

11. **SCNA Comment:** Create physical and visual transitions to the urban and natural context at Campus perimeter.

LCM Response: The Newhouse Building Replacement project includes landscape planning with visual and textural transition necessary along sidewalks and streets. Tall trees, understory, and groundcovers provide three heights of plantings that soften the visual impact of the new four-story building. Pritchard site will be planted with extended “fir collar,” understory, and groundcovers.

12. **SCNA Comment:** Define gateways and reinforce seams between campus and neighborhoods with attention to pedestrians and views.

LCM Response: Newhouse Building Replacement landscape design is designed to complement the historic and current site context, both built and natural. Careful attention has been paid to connect pedestrian circulation paths between the campus and surrounding neighborhoods; views in and out of the campus have been considered. Planting design at the northeast corner of Opportunity Site Six was designed to incorporate the same species planned for the opposite side of Sid Snyder Avenue SW, emphasizing the gateway to the campus. The design will continue to be refined with stakeholder input from LCM Landscape Peer Review Panel.

13. **SCNA Comment:** Create strong relationships between historic Capitol Group and South Capitol Neighborhood.

LCM Response: Newhouse siting reinforces the orientation of Cherberg, O'Brien, and Insurance Buildings on Sid Snyder Avenue SW, providing clear and strong visual connection from Capitol Way South to the ultimate focus of the Legislative Building. Orientation for visitors, staff, and residents is immediate with this framed view. To soften and “ground” the buildings, cues from the Olmsted landscape legacy are used, including organic and meandering pedestrian paths and plantings in three heights (tall trees, understory, and groundcover). Both Newhouse and Pritchard focus on the main gateways to campus from South Capitol Neighborhood, Sid Snyder Avenue SW and Water Street SW. These street grids and building placement offer clear and open connection to the South Capitol Neighborhood.

14. **SCNA Comment:** Maintain pedestrian access on or near Columbia and Water Streets.

LCM Response: Pedestrian access on and near Columbia Street SW and Water Street SW is maintained and improved with code-required ADA features and pavement upgrades.

15. **SCNA Comment:** Provide complementary buffers along 15th Avenue, Columbia and Water Streets and articulate building facades.

LCM Response: On Opportunity Site Six, landscape buffers are provided as described in General category responses above. Newhouse Building facades are heavily articulated by incorporating similar proportions of openings, depth of setbacks from the building face, and relief across the building elevations as found in adjacent historic buildings.

16. **SCNA Comment:** In addition, the 2006 Master Plan also states, "State development at the boundaries of its campuses should be sensitive to the character of the adjoining neighborhood, particularly residential neighborhoods."

LCM Response: Current and future planning for the Capitol Campus is guided by 2006 Master Plan Principles 1 (Public Use and Access including Public Use of Capitol Grounds and Accessibility for All); 3 (Community Vitality, including Transportation Demand Management and Environmental Stewardship); 4 (Stewardship of Historic Properties); and 5 (Design). Sensitivity to the adjoining residential areas is demonstrated by the extension of Olmsted landscape along streets, sidewalks, building edges, and pedestrian paths.

17. **SCNA Comment:** We appreciate the effort that was expended in preparing the LCM checklist. However, we think the development of a programmatic environmental impact statement at the beginning of the process (similar to what was used for the future of Capitol Lake) would have greatly benefitted the planning for LCM as well as the implications of the ten-year Capital Plan envisioned for the West and East Campus.

LCM Response: An EIS is prepared when the lead SEPA agency determines a proposal is likely to have significant adverse environmental impacts. The LCM SEPA checklist was prepared for a non-project action, for project planning purposes, to govern the future LCM component projects, and will be used during the evaluation of future subproject proposals for potential adverse environmental impacts.

18. **SCNA Comment:** Early on this approach would have identified and evaluated alternatives for campus expansion and building replacement, including alternatives for the Pritchard building, siting and size considerations of the Newhouse building, parking and transportation management needs, and a comprehensive landscape design plan.

LCM Response: Comment noted. Please see General response 16 (above). To provide the required adjacencies for legislative members to the Legislative Building, there are no alternative building site locations available for Newhouse Building Replacement nor Pritchard Rehabilitation/Expansion. Sizing, siting, parking, and landscaping are critical issues under design with proposed projects.

19. **SCNA Comment:** Also, a public participation plan, including informed decision making, would have strengthened this process. The SCN requested a scoping process that was denied.

LCM Response: See General response 17 (above).

20. **SCNA Comment:** In other sections of our comments, we suggested as a mitigation measure a Memorandum of Understanding between DES and the SCN on issues where LCM construction will directly impact the SCN.

LCM Response: Thank you for your comment regarding a Memorandum of Understanding (MOU) between DES and SCNA. An MOU does not fall under the purview of the SEPA process; however, construction schedule and impact issues will be reviewed and formalized as part of the City of Olympia building permit process.

21. **SCNA Comment:** The only mitigation included in the MDNS is the commitment to institute mitigations caused by the demolition of historic buildings. Other mitigations are suggested, but no commitment is made to implement them. Further, we have suggested the following mitigations that should be instituted to mitigate the impacts of LCM: A Memorandum of Understanding between DES and SCN that includes the items listed directly above.

LCM Response: See General response 20 (above). The mitigation measures included in the LCM Non-Project SEPA checklist are recommendations only. Actual required mitigation measures will be determined in permitting for each subproject.

22. **SCNA Comment:** Measures to encourage the use of electric cars.

LCM Response: DES Parking Study Workgroup is reviewing this issue as continued improvements are made inside state government for additional electric vehicle charging stations in major parking lots, as well as more electric fleet vehicles available for state employee business travel. DES Fleet inventory is currently 3.3% Battery Electric Vehicle; 2.5% Plug-In Hybrid Electric Vehicle; and 33.1% Hybrid Vehicles. Additionally, the existing count of charging stations on campus has increased to 138, which are located in twelve different areas of the campus.

23. **SCNA Comment:** A commitment and plan to institute a robust telework program for employees of the legislature and others who work on Campus.

LCM Response: DES Parking Study Workgroup is reviewing this issue along with analysis to determine "*Work from Home*" and on-campus employee census.

24. **SCNA Comment:** A commitment to instituting the recommendations in the Heffron report for enhancing the pedestrian connection between the West Campus and the Plaza Garage and improving users' perceptions of the Plaza Garage.

LCM Response: The mitigation measures included in the LCM Non-Project SEPA checklist are recommendations only. Actual required mitigation measures will be determined in permitting for each subproject.

25. **SCNA Comment:** A commitment to instituting the Heffron report's recommendations to improve campus parking policies.

LCM Response: Capitol Campus parking policy is outside of the scope of the LCM Project and SEPA process; however, DES Parking Study Workgroup is studying this topic and many other issues related to campus parking.

Earth

1. **Department of Ecology Comment:** Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

LCM Response: Erosion control measures will be in place prior to the start of any construction activities, as required by the permitting agencies. Best Management Practices (BMP) monitoring by a certified erosion control lead (CESCL) will be conducted and adherence to the Stormwater Pollution Prevention Plan and NPDES Construction Stormwater General Permit will be implemented during construction of each subproject to prevent impacts from turbid stormwater runoff.

Air

ORCAA Comment: Olympic Region Clean Air Agency (ORCAA) regulations require an asbestos survey for all demolition projects. Demolition projects by definition also include renovations performed to load-bearing structural members on the current building as part of a remodel. Prior to any demolition project, the following must be completed:

- A good faith asbestos survey must be conducted on the structure by a certified Asbestos Hazardous Emergency LCM Response Act (AHERA) building inspector;
- If asbestos is found during the survey, an ORCAA Asbestos Removal Notification must be completed and all asbestos containing material must be properly removed prior to the demolition; and,
- If the structure is 120 sq. ft. or greater, an ORCAA Demolition Notification must be submitted regardless of the results of the asbestos survey. There is a mandatory 14-day waiting period after ORCAA receives notification, so we recommend the applicant complete the Demolition Notification promptly after receiving the survey.

*These requirements are specific to ORCAA and are not synonymous with any city or county permitting jurisdiction requirements.

LCM Response: The following asbestos surveys have been completed:

- Newhouse Building Replacement, Existing Newhouse Building Salvage Inventory, Miller Hull, March 2022
- Initial Regulated Building Material Survey, Irving R. Newhouse Senate Building, PacRim, January 2022
- Limited Asbestos Survey, Irving R. Newhouse Senate Building, PacRim, January 2022
- Limited Hazardous Materials Survey Report, Ayer House (Formerly AP Building), PBS Environmental, July 2021
- Limited Hazardous Materials Survey Report, Carlyon House (formerly Shumaker Building), PBS Environmental, July 2021
- Phase 1 Environmental Assessment, included in Predesign Report, PBS, August 2020
- Limited Indoor Air Quality Assessment Report, Irving R. Newhouse Building, PBS, November 2019
- Pritchard Building Indoor Air Quality Office Areas Report, EMLab P&K, October 2013
- Asbestos Survey Report, Institutions Building (#15), PBS Environmental, April 1995
- Asbestos Survey Report, A.P. Building (#98), PBS Environmental, April 1995
- Asbestos Survey Report, Shumaker Building (#94), PBS Environmental, April 1995
- Indoor Air Quality Study of State Library, Abacus Consultants, June 1993

Any structures not previously surveyed for asbestos will be surveyed to comply with the ORCAA requirement prior to demolition. An Asbestos Removal Notification (if asbestos encountered) and Demolition Notification will be submitted to ORCAA, and all asbestos-containing material will be properly removed prior to demolition, in accordance with all applicable regulations and project specifications 02 80 00 Facility Remediation, Hazardous (Regulated Building) Materials issued to the contractor for each subproject.

1. **ORCAA Comment:** Additionally, the environmental checklist notes that some natural gas-fired boilers may be part of the project. Please take some time to review common stationary sources of emissions that require pre-approval from ORCAA via a Notice of Construction (NOC). Our website covers applicability information for both boilers and emergency engines:
<https://www.orcaa.org/permit-programs/permit-registration-assistance/>
If you have any questions about NOC applicability, please contact me at lauren.whybrew@orcaa.org, or by calling our main office at 360-539-7610.

LCM Response: There are no natural gas-fired boilers in the LCM subproject scopes.

2. **SCNA Comment:** Per the SEPA checklist, one way to reduce the long-term negative impacts on air quality caused by increased vehicle trips arising from the increased office space is to "...encourage the use of electric vehicles to the site." We appreciate the Agency's support for increased reliance on electric cars as one potential mitigation measure. However, the SEPA checklist should include other mitigation strategies, including aggressive support for increased reliance on telework, promotion of commute trip reduction policies, and alternate modes of transportation such as local public transit, improved transit services along the Seattle – Olympia I-5 corridor, biking, and walking.

LCM Response: Department of Enterprise Services has prioritized internal review and a capital project funding request for formal parking study and future strategies. Currently, DES Parking

Study Workgroup is looking at wider use of the State's Commute Trip Reduction (CTR), additional visitor parking areas, improved signage to and on campus, as well as in-depth forecast of continued Work from Home impacts on traffic, transportation, and parking. The long-term goal of the CTR program is that 40% of all trips to campus occur by alternative commute methods, including work-from-home. Continued study and implementation of parking strategies are not within the authority of the LCM program; however, the issue is part of DES comprehensive planning work.

3. **SCNA Comment:** Emissions from private cars are one of the greatest sources of air pollution and greenhouse gases. The Legislative Campus Modernization Transportation Technical Report assumes the “worst-case” scenario, that 60 percent of Capitol Campus employees will drive alone to work. State government can do better than this via proactive policies to promote alternatives to single occupancy vehicles. Before the pandemic, fewer than 5% of Capitol Campus employees reported they worked from home. Now, conditions are ripe for wide ranging telework programs. This is especially true when the Legislature is not in session. Although 47.6 % of employees in state executive branch agencies are eligible to telework, only 23.7 % take advantage of this option. Greatly increased reliance on remote work should be included in the LCM SEPA checklist as another air pollution mitigation measure.

LCM Response: The worst-case trip generation estimates in the Transportation Technical Report provided with the SEPA Checklist, performed at the City of Olympia’s request, reflect a long-term future condition where the additional space provided in the Newhouse replacement building could support much higher levels of employment than currently exist. In reality, the Newhouse Building will house the same number of legislators and staff that are already housed in the existing Newhouse Building and elsewhere on the campus, and who already commute to the site each day. The same scenario exists for the Pritchard Rehabilitation/Expansion project. In the long-term, campus-wide measures to reduce parking demand would reduce trips and resulting potential air pollution. See Air response 3 (above).

4. **SCNA Comment:** Implementation of a robust telework program for employees of the Legislature during interim periods between legislative sessions is encouraged. Such a program will reduce air pollution, auto trips, and the need for more parking. We are hopeful that can happen.

LCM Response: Continued study and implementation of parking strategies are not within the authority of the LCM program; however, the issue is part of DES Parking Workgroup studies.

5. **SCNA Comment:** These air pollution mitigation measures should also be included in the SEPA checklist.

LCM Response: The air pollution mitigation measures included in the comment are outside the scope of the LCM Project. See Air responses 1 and 3 (above) for the Department of Enterprise Services’ work on the issue.

Water

1. **Evan Wood, DOE (Ecology) Comment:** Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington and is subject to enforcement action.

LCM Response: The project will not discharge sediment-laden runoff or other pollutants to state waters. All state waters are located outside the construction area; erosion control measures will be implemented to protect state waters. Storm drains discharging to the storm system (which eventually discharges to state waters) will be protected during construction using appropriate temporary erosion and sedimentation control (TESC) best management practices (BMPs).

2. **Evan Wood, DOE (Ecology) Comment:** Construction Stormwater General Permit [CSWGP]: The following construction activities require coverage under the Construction Stormwater General Permit:
 - a. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
 - b. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State.

LCM Response: The LCM total ground disturbance will be more than 1 acre and each subproject will need to be included in the Notice of Intent for a CSWGP as a Common Plan of Development. The CSWGP is discussed in Section A. 10 of the Non-Project SEPA checklist.

3. **Evan Wood, DOE (Ecology) Comment:** This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State.

LCM Response: No forested areas will be converted as part of the proposed LCM Project. Any temporary disturbance, such as during the Pritchard project construction, will be less than one acre and disturbed areas will be replanted during restoration activities.

4. **Evan Wood, DOE (Ecology) Comment:** Any size construction activity discharging stormwater to waters of the State that Ecology determines to be a significant contributor of pollutants to waters of the State of Washington and reasonably expects to cause a violation of any water quality standard.

LCM Response: Comment noted.

5. **Evan Wood, DOE (Ecology) Comment:** If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with

concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at Carol.Serdar@ecy.wa.gov, or by phone at (360) 742-9751.

LCM Response: Comment noted. Additionally, we understand that Carol Serdar has retired. The appropriate Ecology representative will be contacted if contamination is encountered.

6. **Evan Wood, DOE (Ecology) Comment:** Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: <https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

LCM Response: The stormwater system currently serving the west half of the project site (Opportunity Site 6) and Water Street SW discharges to Capitol Lake, and the proposed Pritchard project developed condition also will discharge stormwater to Capitol Lake through a dedicated stormwater system. Capitol Lake is on the State's 303(d) list for total phosphorous, fecal coliform bacteria, and ammonia-N. None of these will result from LCM construction activities and they will not be entrained in construction stormwater discharge that could reach Capitol Lake.

7. **Evan Wood, DOE (Ecology) Comment:** The applicant may apply online or obtain an application from Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/> - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

LCM Response: A CSWGP will be obtained for the LCM before construction begins.

Plants

1. **SCNA Comment:** Statement from the Non-Global SEPA Checklist: "Evergreens and native understory vegetation will be used, where appropriate, to create a landscape character that extends the original Olmsted landscape legacy to the southern edge of the West Campus. Although we appreciate the landscape firm's choice of plantings, we think much more needs to be done to support the conclusion that the "planting plan will respect the Olmsted legacy on the Capitol Campus." The inclusion of native trees and understory plantings recommended in the 2009 Historic Landscape Preservation Plan are just two elements among many that contribute to a landscape plan that honors the Olmsted legacy.

LCM Response: Inclusion of native trees, understory plantings, and groundcover remain a top priority in replacement or new landscape work.

2. **SCNA Comment:** Implementing other important Olmsted landscape design principles would: Address the connectivity of Newhouse with the West Campus, the Pritchard renovation, and the SCN.

LCM Response: Visual connectivity between Capitol Campus with existing and new buildings and South Capitol Neighborhood is maintained through preservation of views to/from campus and extension of Olmsted-inspired landscape from Great Lawn to west slope to Capitol Lake.

3. **SCNA Comment:** Provide a human scale experience surrounding a massive building.

LCM Response: LCM trees, understory plantings, and groundcover will offer pedestrians the view and comfort of human-scaled texture, color, and movement in the landscape.

4. **SCNA Comment:** Help address concerns regarding the proportionality of Newhouse to the adjoining State Capitol Group.

LCM Response: The proportion, scale, and massing of the Newhouse Building Replacement are mitigated by the figure/ground relationship of the building to the area of the west half of Opportunity Site Six along with linear space afforded by blocks of both Columbia Street SW and Water Street SW between Sid Snyder Avenue SW and 15th Avenue SW. A similar site configuration is planned for the Pritchard Rehabilitation and Expansion.

5. **SCNA Comment:** Create a pedestrian-friendly southern gateway to the campus.

LCM Response: Environmental cues of welcome to pedestrians are ADA access improvements at intersections; walkways through both Opportunity Sites Five and Six; extension of existing pedestrian route over Capitol Way; more bicycle racks; and rich planting along sidewalks and parking lots.

6. **SCNA Comment:** We appreciate DES consulting with known experts on Olmsted [sic] design principles and hope this continues.

LCM Response: Comment noted. The LCM Landscape Peer Review Panel continues to provide design support and refinement of the LCM landscape plan while upholding continued stewardship of the Olmsted landscape legacy.

7. **SCNA Comment:** The large areas of surface parking degrade the Campus and seriously constrain the development of an effective landscape plan for this major south Campus development. "Very simply – when the area devoted to parking is too great, it destroys the land...Large parking lots have a way of taking over the landscape creating unpleasant places and having a depressing effect on the ...space around them." (Source: A Pattern Language, Pages 121 and 504)

LCM Response: LCM subprojects are required by proviso to include adequate and safe parking convenient to legislative buildings during session. DES Parking Study Workgroup is underway to review parking and commute issues.

8. **SCNA Comment:** Without proper landscape mitigation for the scale and mass of the buildings and the large amount of surface parking, the LCM will wall off SCN and resemble a suburban office complex that is incompatible with the grounds of the Capitol Campus and adjoining historic residential neighborhood.

LCM Response: On both Opportunity Sites Five and Six, coniferous trees, understory, and groundcovers will be sited to soften the hard edges of the buildings and modulate light and color on pedestrian paths. Newhouse Building facades are heavily articulated by incorporating similar proportions of openings, depth of setbacks from building face, and relief across the building elevations found in the adjacent historic buildings. Pritchard project will deliver an expansion that honors and extends the life of Thiry's original midcentury modern building.

9. **SCNA Comment:** The checklist also does not mention what will happen with the historical elm outside the Carlyon residential building or the beautiful old purple leaf European Beech in the visitor's parking lot.

LCM Response: Neither of these two trees can be saved. The condition of the elm tree on the southeast corner of the Carlyon House was characterized as "fair" by the consulting arborist. Additionally, it is growing on top of a 5-foot-high retaining wall which has caused major "squeezing" of the roots beneath the tree canopy. The Newhouse site design requires lowering of the finish grade approximately 4 feet below existing conditions, causing vertical isolation of the tree and its root structure. The purple leaf European beech in the existing Visitor Parking Lot will be replaced in the reconfigured parking area and set back from the precipitous ledge above Sid Snyder Avenue SW where the existing tree is located.

10. **SCNA Comment:** It does not commit to the preservation of the three very tall mature birches and the monkey tree along 15th between Columbia and Water Streets.

LCM Response: The birch trees, as well as the Monkey Puzzle tree, will be preserved.

11. **SCNA Comment:** Eliminate surface parking south of Newhouse and along Water St SW to allow the development of a landscape plan that reflects Olmsted design principles by creating a unified composition where "the buildings and landscape are complementary and mutually supportive of the larger concept of democratic space".

LCM Response: The current landscape plan saves many large existing trees and proposes new native, large trees, understory plantings, and ground cover as recommended in the 2009 West Campus Landscape Preservation Plan. Work continues on replacement tree options. The LCM project must meet the proviso-required building area and parking numbers.

12. **SCNA Comment:** Develop a landscape plan that reflects the Olmsted Legacy by considering "the Capitol Campus and its surroundings holistically in order to weave a more contiguous fabric of interconnected open spaces and corridors and to extend the positive healthful influences of the campus within the community" (2009 West Campus Landscape Preservation Plan).

LCM Response: The landscape plan demonstrates stewardship of the historic Olmsted landscape by saving many existing trees while proposing substantial numbers of native and large trees, understory plantings, and groundcover. The plan includes a pedestrian circulation system connecting the Newhouse site to the rest of the West Campus and the surrounding community. The proposed 10-foot-wide vegetative screening of the required on-site parking along 15th Avenue SW incorporates large trees (4 existing), understory plantings, and groundcover, thereby greening the visual transition between the West Campus and the South Capitol Neighborhood.

13. **SCNA Comment:** Enhance vegetation and other design elements on Sites 5, 6, and Water Street Southwest by focusing attention to all Olmsted design principles.

LCM Response: The LCM Landscape Peer Review Panel will continue to provide design support and refinement of the LCM landscape plans while upholding continued stewardship of the Olmsted landscape legacy.

14. **SCNA Comment:** Preserve the historic elm tree outside the Carlyon residence and the beautiful old purple leaf European Beech in the visitor parking lot.

LCM Response: See Plants response 10 (above).

15. **SCNA Comment:** Preserve the three old weeping birch trees and monkey tree behind the Newhouse Building during sidewalk reconstruction.

LCM Response: See Plants response 11 (above).

16. **SCNA Comment:** If parking is retained on Site 6, then landscaping must totally screen this parking to enhance the visual experience of those entering the Capitol Campus.

LCM Response: The proposed visual screening of parking on LCM sites will be a heavily planted 10-foot-wide buffer. To provide security and safety requirements for pedestrians and drivers, parking screening will allow view through for patrolling staff.

17. **SCNA Comment:** Create a pedestrian- and bike-friendly southern gateway by keeping Water Street open, narrowing the street width to slow traffic (and give Newhouse 50' of security protection), and planting pedestrian scale trees and other attractive vegetation on both sides of Water.

LCM Response: Campus security concerns require the closure of Water Street SW between Sid Snyder Avenue SW and 15th Avenue SW to vehicular traffic. However, pedestrian and bicycle access will be retained. The potential for an allée of trees on both sides of the same block is being reviewed with internal stakeholders.

18. **SCNA Comment:** Include pedestrian walkways and areas with benches, memorials.

LCM Response: LCM subprojects are incorporating these site concepts.

19. **SCNA Comment:** Update Olmsted's vision for the Capitol Campus of the democratic process with landscape that recognizes today's values for justice, equity, inclusion, and diversity and climate sustainability goals.

LCM Response: Updates to Olmsted's vision is outside the scope of the LCM Program and the SEPA process.

20. **SCNA Comment:** Continue to consult with experts on Olmstead (sic) landscaping in the development of landscape plans.

LCM Response: Public input received during the Newhouse Building Replacement project preliminary design led to the formation of the LCM Landscape Peer Review Panel, which is providing counsel and comment toward continued stewardship of the Olmsted landscape legacy on the Capitol Campus.

Animals

No comments were received for this category.

Energy and Natural Resources

No comments were received for this category.

Environmental Health

1. **Tara Davis, DOE (Ecology) Comment:** The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition.

LCM Response: Building Materials Surveys are underway and will be in hand before building permits are approved and released. Hazardous (Regulated Building) Materials project specification 02 80 00, Division Section 010 will be followed during demolition activities. General Contractor/Construction Management firms for all LCM subprojects will hire an abatement contractor, who will be responsible for the preparation and implementation of Abatement Work Plans.

2. **Tara Davis, DOE (Ecology) Comment:** It is important that these materials and wastes are removed and appropriately managed prior to demolition.

LCM Response: All hazardous building materials will be removed and disposed of appropriately, including materials containing asbestos, lead-based paint, PCBs, and mercury.

3. **Tara Davis, DOE (Ecology) Comment:** It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials.

LCM Response: DES will hire a firm to observe, provide oversight of the waste management activities, and document that the work was conducted in accordance with project specifications and regulations.

4. **Tara Davis, DOE (Ecology) Comment:** Please review the “Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes,” on Ecology’s website at: Construction & Demolition Guidance.

LCM Response: Comment noted. The general contractor for each subproject will follow all rules for managing, removing, and disposing of potentially dangerous or hazardous building materials generated during the demolition or renovation of existing structures.

5. **Derek Rockett, DOE (Ecology) Comment:** All removed debris resulting from this project must be disposed of at an approved site.

LCM Response: All demolition debris will be removed and disposed of appropriately.

6. **Derek Rockett, DOE (Ecology) Comment:** All grading and filling of land must utilize only clean fill.

LCM Response: Only non-contaminated (i.e., clean) fill will be used.

7. **Derek Rockett, DOE (Ecology) Comment:** All other materials may be considered solid waste, and permit approval may be required from your local jurisdictional health department prior to filling.

LCM Response: Clean materials from the site that are considered as reuse for fill material may be considered solid waste and the general contractor for each subproject will comply with Thurston County's Public Health & Social Services Environmental Health division's requirements before using such materials as fill on site.

8. **Derek Rockett, DOE (Ecology) Comment:** Contact the local jurisdictional health department for proper management of these materials.

LCM Response: Comment noted. Construction will comply with Thurston County's Public Health & Social Services Environmental Health division's requirements before using such materials as fill on site.

9. **Thomas Middleton, DOE (Ecology) Comment:** 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 testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office (SWRO) at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Thomas Middleton with the SWRO, Toxics Cleanup Program at the phone number provided above.

LCM Response: Comments noted, and requirements will be followed by DES or their consultant(s) if contamination of soil or groundwater is suspected, discovered, or occurs during the construction of the LCM subprojects.

10. **SCNA Comment:** The document addresses specifically regulated hazardous chemicals, asbestos, PCBs, and lead-based paint in the existing buildings, but fails to address other hazardous chemicals in building materials in the existing building or in the replacement building. The document does not discuss disposal of materials with other dangerous waste, such as organohalogen flame retardants in insulation, electronics, and furnishings. These materials need to be disposed of properly.

LCM Response: As State of Washington's Departments of Ecology and Health continue a four-phase implementation process for "Safer Products for Washington," Department of Enterprise Services is cognizant and compliant with process map and schedule. LCM Program subprojects abatement will follow all regulations for removal and proper disposal of existing materials and products in the existing structures.

11. **SCNA Comment:** The SEPA checklist says there are no hazardous chemicals that are "known or anticipated," but we do know of hazardous materials that are expected to be in construction materials, electronics, and furnishings unless DES states steps to avoid them.

LCM Response: Proper steps are being taken through U. S. Green Building Council's LEED certification program to minimize use of hazardous materials being used in LCM subprojects.

12. **SCNA Comment:** Washington State is taking action on toxic chemicals in building materials, such as per and polyfluorinated substances (PFAS) in carpets and other furnishings. While the sale of these and other products in Washington will not be banned for several years, the State should lead in its purchasing of safer alternatives. The Washington State Department of Ecology has information on environmentally preferable purchasing laws, rules, and Governor's Directives (<https://ecology.wa.gov/Waste-Toxics/Reducing-recycling-waste/Strategic-policy-and-planning/Environmentally-preferable-purchasing>). The information includes what to look for in building materials, office supplies, and furnishings and guidelines for state purchasing.

LCM Response: See Environmental Health response 10 (above).

13. **SCNA Comment:** In addition to state actions, the federal government, through the U.S. General Services Administration and the Environmental Protection Agency has recommendations for environmentally preferable purchasing for both construction materials and furnishings (<https://www.epa.gov/greenerproducts/recommendations-specifications-standards-and-ecolabels-federal-purchasing>).

LCM Response: See Environmental Health response 10 (above).

14. **SCNA Comment:** "There will be short-term noise from the drilling of support shafts and heavy equipment used during demolition and construction activities. Construction noise will be limited to regular working hours. Exact hours and duration of construction will be determined at the design phase for each building and will be discussed in the project specific SEPA checklists prepared for project work." Construction noise will significantly impact the SCN. While DES commits to following city codes, construction noise impacts are unpredictable and can change. Mitigation measures should include a Memorandum of Understanding with DES that shows the exact hours of construction and adherence to the City noise regulations as well as how the SCN will be notified if changes to hours and noise levels occur.

LCM Response: Thank you for your comment regarding a Memorandum of Understanding (MOU) between DES and SCNA. A MOU does not fall under the purview of the SEPA process. However, construction hours, access, noise, and other impacts will be formalized as part of the City of Olympia building permit process.

Land and Shoreline Use

1. **SCNA Comment:** The LCM and the Newhouse Building Replacement Project should be informed and guided by two definitive planning documents: the 2006 Master Plan for the Capitol of the State of Washington and the 2009 West Campus Historic Landscape Master Plan.

LCM Response: The proposed LCM Program design, at various stages for the subprojects, incorporates elements of the 2006 and 2009 planning documents guidelines where possible and practicable. For example, the Newhouse Building Replacement design incorporates the following from the 2006 Master Plan: Preserving open spaces, defining the Campus Entry at Sid Snyder and Capitol Way, protecting historic view corridors, recognizing the Legislative Building as the Campus' predominant feature, siting the building with the central main entry on Sid Snyder Ave SW, all while providing unique opportunities for works of art from Arts WA "Art in Public Places" to be incorporated within the site and building, to name a few. While these planning documents provide important guidelines, the project design must comply with legislative requirements. Section 1111 of the 2021 Capitol Budget SHB 1080 SL, Section 4, Part (b) states: "The design and construction must result in:

- (i) A high performance building that meets net-zero-ready energy standards, with an energy use intensity of no greater than 35;
- (ii) Sufficient program space required to support senate offices and support functions;
- (iii) A building façade similar to the American neoclassical style with a base, shaft, and capitol expression focus with some relief expressed in modern construction methods to include adding more detailing and depth to the exterior so that it will fit with existing legislative buildings on west capitol campus, like the John Cherberg building;
- (iv) Member offices of similar size as member offices in the John A. Cherberg building;
- (v) Demolition of the buildings located on opportunity site six"

2. **SCNA Comment:** Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

LCM Response: The proposal is compatible with the existing and projected land use and plans and follows the 2006 and 2009 planning guidelines. The proposal does not change the existing land use from that of supporting legislative functions on the Capitol Campus.

3. **SCNA Comment:** Conformance to principles of the 2006 Master Plan for the Capitol of the State of Washington and the 2009 West Campus Historic Landscape Preservation Master Plan in future Campus development.

LCM Response: The documents referenced are planning documents only, and the principles are not requirements for future development. That said, the proposed project does conform to several principles in the 2006 and 2009 master plans, as indicated in Land and Shoreline Use response 1 (above).

4. **SCNA Comment:** The careful attention given to building specifications according to the principles and policies of the 2006 Master Plan for the Capitol of the State of Washington and the selection of tree and understory plantings recommended in the 2009 West Campus Historic Landscape Preservation Master Plan.

LCM Response: The 2009 West Campus Historic Landscape Preservation Master Plan document was used to directly inform the selection of vegetation at the Newhouse Building Replacement site. The planting design continues to evolve as part of the LCM Landscape Peer Review process. A similar process will be used to select trees, understory, and groundcover for the Pritchard project.

5. **SCNA Comment:** Site new buildings as part of the existing open space/landscape pattern.

LCM Response: The Newhouse Building Replacement project was sited to frame the westward views from major campus entry at Sid Snyder Avenue SW and Capitol Way South, as well as to frame the northward view from South Capitol Neighborhood to historic campus buildings. The building location is set back from street edges to allow the landscape to include tall trees, understory, and groundcover on the perimeter of the site thereby providing visual and textural transition from hardscape to green spaces. Existing “fir collar” landscaping on the west side of Pritchard and O’Brien will be extended along 16th Avenue SW and Water Street SW thereby adding coniferous street plantings that were not included in the original landscape plan implementation.

6. **SCNA Comment:** Create physical and visual transitions to the urban and natural context at Campus perimeter.

LCM Response: The Newhouse Building Replacement project includes landscape planning with visual and textural transition necessary along sidewalks and streets. Tall trees, understory, and groundcovers provide three heights of plantings that soften the visual impact of the new four-story building. The Pritchard site will be planted with extended “fir collar,” understory, and groundcovers.

7. **SCNA Comment:** Define gateways and reinforce seams between campus and neighborhoods with attention to pedestrians and views.

LCM Response: Newhouse Building Replacement landscape design is designed to complement the historic and current site context, both built and natural. Careful attention has been paid to connect pedestrian circulation paths between the campus and surrounding neighborhoods; views in and out of the campus have been considered. Planting design at the northeast corner of Opportunity Site Six was designed to incorporate the same species planned for the opposite side of Sid Snyder Avenue SW, emphasizing the gateway to the campus. The design will continue to be refined with stakeholder input in the LCM Landscape Peer Review Panel process.

8. **SCNA Comment:** Create strong relationships between the historic Capitol Group and the South Capitol Neighborhood.

LCM Response: Newhouse siting reinforces the orientation of Cherberg, O'Brien, and Insurance buildings on Sid Snyder Avenue SW, which provides the clear and strong visual connection from Capitol Way South to the ultimate focus of the Legislative Building. Orientation for visitors, staff, and residents is immediate with this framed view. To soften and "ground" the buildings, cues from the Olmsted landscape legacy are used, including organic and meandering pedestrian paths and plantings in three heights (tall trees, understory, and groundcover). Both Newhouse and Pritchard focus on the main gateways to campus from South Capitol Neighborhood, Sid Snyder Avenue SW and Water Street SW. The axial relationship of these streets with existing and new buildings offers a clear connection to the South Capitol Neighborhood.

9. **SCNA Comment:** Provide complementary buffers along 15th Avenue, Columbia and Water Streets and articulate building facades.

LCM Response: On Opportunity Site Six, landscape buffers are provided as described in Land and Shoreline Use comment replies above. Newhouse Building facades are heavily articulated by incorporating similar proportions of openings, depth of setbacks from building face, and relief across the building elevations found in the adjacent historic buildings. On Opportunity Site Five, Pritchard rehabilitation and expansion will depend on smooth facades in keeping with the historic preservation principles necessary for reuse of the modern architecture masterpiece. Landscape buffers along the south and east site limits will extend the existing "fir collar" from the west slope to the Water Street SW gateway to campus.

10. **SCNA Comment:** Development of the South Edge must reinforce the organization of the West Campus, as a whole.

LCM Response: Building development along the south edge will include Newhouse Building Replacement and the Pritchard Rehabilitation and Expansion. Both projects will depend heavily on current interpretation of Olmsted landscape legacy and the extension of a metaphorical "fir collar" from the west slope across 16th Avenue SW to Water Street SW then north and east along 15th Avenue SW to Capitol Way South. All planning

guidelines recommend visual and textural transition between the Capitol Campus and the residential South Capitol Neighborhood to the south. Plants, pedestrian walkways, site lighting, and accessibility-for-all are part of the solutions.

11. **SCNA Comment:** State development at the boundaries of its campuses should be sensitive to the character of the adjoining neighborhood, particularly residential neighborhoods.

LCM Response: Similar to Newhouse Building Replacement, current and future planning for the Capitol Campus, are informed by 2006 Master Plan Principles 1 (Public Use and Access including Public Use of Capitol Grounds and Accessibility for All); 3 (Community Vitality, including Transportation Demand Management and Environmental Stewardship); 4 (Stewardship of Historic Properties); and 5 (Design). Sensitivity to the adjoining residential areas is demonstrated by extension of Olmsted landscape along streets, sidewalks, building edges, and pedestrian paths.

12. **SCNA Comment:** Future reinvestigation of the South Edge Sub-Campus plan should include a thorough review of the 2009 Landscape Preservation Master Plan and explicitly and equally emphasize the preservation of the architecture of the Capitol Group and the Campus landscape within which the Capitol Group resides.

LCM Response: Although important as future development is planned, additional investigation of the South Edge Sub-Campus Plan is not part of the LCM project nor SEPA process.

13. **SCNA Comment:** Recommended setbacks and massing of new development are necessary ... to minimize the scale disparity between the South Edge and the South Capitol Neighborhood.

LCM Response: Newhouse Building Replacement was sited to frame views along Sid Snyder Avenue SW to the Legislative Building and to maximize views from the interior to the Great Lawn. Siting also considered more technical criteria such as security setbacks, required parking counts, site circulation, and accessible routes to the building entries. Rehabilitation and expansion of the Pritchard Building will extend the height of the existing building within recommended historic preservation requirements with linear extension of the building to the east to provide required square footage.

14. **SCNA Comment:** Landscaping—particularly yards, gardens and trees is a character defining feature of the South Capitol Neighborhood District, thus important to respond to.

LCM Response: Landscaping with tall trees, rich understory, and groundcover is a character-defining feature of the entire South Sound region, including both the Newhouse and Pritchard sites. LCM work will incorporate hundreds of new plants of all heights while protecting mature trees across the site. The 2009 West Campus Historic Landscape Preservation Master Plan guides every landscape decision on the LCM project.

15. **SCNA Comment:** Softening parking lot areas with trees will act to reduce the heat island effect, to improve pedestrian experience, to reduce impact of vehicles, and provide a more sensitive transition to the SCN.

LCM Response: The Newhouse landscape plan maximizes the number of saved and new trees in order to soften the impact of the building and provide visual and textural transition to the adjoining residential neighborhood while meeting the required parking counts. Existing trees on the west and south of the Pritchard Building will be protected during construction and be extended into the transition area along 16th Avenue SW and Water Street SW.

16. **SCNA Comment:** The goal is to reduce, and eventually eliminate, the majority of dedicated surface parking, so that this valuable landscape may be enlisted toward higher use.

LCM Response: LCM parking requirements are mandated by proviso (Section 6024 of the 2021 Capitol Budget SHB 1080 SL, Section 5, item II); the project is charged with minimizing the loss of existing parking stalls while softening the visual impact of required surface parking lots.

17. **SCNA Comment:** The caution is to avoid inadvertently displacing the impact of vehicular parking to adjacent areas, such as the South Capitol Neighborhood Historic District.

LCM Response: It is important to note that the potential for parking overspill to nearby residential streets is already mitigated through the City of Olympia's Residential Parking Program. This limits parking duration to 1 or 2 hours except with a permit, which only residents of the neighborhood can obtain. Except for eliminating a few spaces on Columbia Street SW, which are technically already controlled by the State (and not the City of Olympia), no changes to the residential parking program will result from the proposed project.

18. **SCNA Comment:** Although the LCM addresses certain components of building design and plant selection, they represent only a portion of the overall design elements of these two significant planning documents. The LCM does not conform to important principles and policies in the Planning Documents that would accomplish effective and appropriate integration of the Newhouse and Pritchard sites with the rest of West Capitol Campus and a smoother transition to the surrounding community (South Capitol Neighborhood).

LCM Response: Refer to Land and Shoreline Use responses 1 and 4 (above).

19. **SCNA Comment:** Minimal essential parking behind and next to Newhouse so that these areas are landscaped consistent with Olmsted's vision and design of gateways and spaces between buildings and respond to the residential and pedestrian character of the South Capitol Neighborhood.

LCM Response: See Land and Shoreline Use responses 7, 8, and 15 (above).

20. **SCNA Comment:** Provide landscape solutions to soften and camouflage the mass and scale of the Newhouse replacement and Pritchard renovation to create a human scale experience and address connectivity issues with each other and the Capitol Group.

LCM Response: See Land and Shoreline Use responses 6, 7, and 15 (above).

21. **SCNA Comment:** Rather than antiquated LCM surface parking lots, create a healthy and environmentally sustainable ecosystem that creates a soft transition to SCN and an inviting space for Campus visitors, elected officials, and State employees.

LCM Response: See Land and Shoreline Use response 16 (above).

Housing

No comments received for this category.

Aesthetics

1. **SCNA Comment:** The checklist discusses structures and districts on the National Register of Historic Places, but not the State's obligation to follow the Secretary of the Interior's Standards for Historic Preservation (RCW 79.24) or the stewardship of historic properties in the 2006 Master Plan the Capitol of the State of Washington. The Secretary of the Interior's Standards for Historic Preservation and Guidelines for Preservation, Rehabilitation, Restoration, and Reconstruction include setting and relation to other structures.

LCM Response: Comment noted. Particularly in design of the Pritchard rehabilitation and expansion, State of Washington will carefully comport with the Secretary of the Interior's Standards for Historic Preservation through our collaboration with Department of Archaeology and Historic Preservation. However, comprehensive planning for the ongoing stewardship of the historic Capitol Campus will carry responsibility for this as well.

2. **SCNA Comment:** Especially for this non-project SEPA checklist, the new structures should be addressed through the lens of the campus as a whole, recognizing the connectivity of its parts.

LCM Response: Comment noted and internal planning for the addition of the LCM subprojects has been carefully considered from a figure/ground analysis of buildings versus open, green space.

3. **SCNA Comment:** We support having the Newhouse Replacement orientated to Sid Snyder Avenue, as are the other buildings in the Capitol Group, as well as the use of materials that DES lists to make the proposed project compatible with the Capitol Group.

LCM Response: Comment noted regarding Newhouse design. Pritchard rehabilitation and expansion will use the existing material palette and scale as markers for fitting the design into the Secretary of the Interior's Standards for Historic Preservation and the 2006 Master Plan for the Capitol of the State of Washington.

4. **SCNA Comment:** However, we are concerned that the Newhouse Replacement may disrupt the proportionality of the Capitol Group. Wilder and White designed the Capitol Group to be perceived as a single structure including the dome. The proportions of each element of the Group were painstakingly calibrated to create a balanced whole.

LCM Response: The height of the Newhouse Building Replacement structure will remain lower than its historic neighbors to maintain the hierarchy of the original grouping of building, while meeting the 2006 Master Plan goals and legislative requirements. The historic geometric proportions, spacing of bays, and vertical pillars have all been studied carefully and translated into the new building to ensure the design relates harmoniously with the established West Campus buildings. The design team recognizes this building is located within the South Edge Sub Campus Plan Area and, as such, the organizational axes of this building and site are subordinate to, while reinforcing, the organizational axes of West Campus.

5. **SCNA Comment:** Adding the Newhouse Building facade-oriented east-west orientation would disrupt the proportions of the Capitol Group as seen from the north (e.g., Percival Landing or on Budd Bay). The Checklist should evaluate this impact and potential mitigations.

LCM Response: The proposed building location was sited to better frame views along Sid Snyder Avenue SW and to provide more views from within the proposed building to the Great Lawn. DES is committed to finalizing a building design that provides a modern complement to the existing Capitol Group architecture and incorporates materials that are compatible with nearby buildings.

6. **SCNA Comment:** We appreciate that attention will be given to soften the visual impact of the Pritchard expansion with landscape improvements.

LCM Response: Comment noted.

7. **SCNA Comment:** While we realize that the Pritchard expansion has yet to be designed, we hope that design considerations to all sides of the building will be made, similar to what has been done for Newhouse replacement.

LCM Response: Comment noted.

8. **SCNA Comment:** The south side is especially important to the SCN, but each side provides visual interest for onlookers.

LCM Response: Comment noted.

9. **SCNA Comment:** Evaluate the impact of Newhouse to the primacy and proportionality of the Capitol Group and explore ways to reduce the dominance of Newhouse to the Capitol.

LCM Response: See Aesthetics response 2 (above).

Light and Glare

1. **SCNA Comment:** The SEPA Checklist indicates that all indoor and outdoor lighting will be designed to maintain safety, will be incorporated into the landscape to maintain aesthetics, will meet environmental standards, and be designed to avoid potential impacts to neighboring residents. Mitigation measures should include a discussion with SCN of how potential impacts of light and glare from the project will be avoided and detailed in a Memorandum of Understanding with the SCN.

LCM Response: As previously stated in the Newhouse SEPA Checklist comment responses, a Memo of Understanding (MOU) between DES and South Capitol Neighborhood Association (SCNA) is not part of the formal SEPA process. However, project teams for both Newhouse Building Replacement and Pritchard Rehabilitation/Expansion will share review documents and collect SCNA comments as part of the construction document (CD) submittal process and resulting building permit process. Design team's priorities and LEED study focus on maintaining site safety and aesthetics while avoiding impacts on the neighborhood. Exterior lighting will be selected and designed for light spill and glare ratings well below the Illuminated Engineer Society (IES) and International Dark-Sky Association recommendations and requirements. Site lighting plans will be reviewed with stakeholders to ensure the lighting is interacting with the landscape, building, and lighting envelope in ways that minimize light impacts and glare on and off the project site. As a part of the CD submission, documents will be provided detailing the approach to exterior lighting across LCM sites. Documents will include photometric details on each exterior light fixture selection and information regarding fixture light spill and glare control means.

Recreation

No comments received for this category.

Historic and Cultural Preservation

1. **SCNA Comment:** Our comments refer back to the Master Plan for the Capitol of the State of Washington and the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. The Master Plan notes that the State's goal is to "prevent further loss of State Capitol historic and cultural resources." Demolition of historic structures, instead of alterations to support needed business functions, goes against the principles of historic preservation.

LCM Response: As the 2006 Master Plan Principle 4 Stewardship of Historic Properties states: "The historic buildings of the Washington State Capitol are the most important public buildings in the state." After careful consideration of opportunity sites identified

for new development offering efficient, high-performance offices, Newhouse Building Replacement siting required the removal of the Press Structures as a "highest and best use" real estate decision.

2. **SCNA Comment:** The demolition and loss of several historic structures, as detailed in the SEPA checklist, are difficult to mitigate.

LCM Response: Department of Enterprise Services managed extensive public outreach to facilitate the removal and relocation of both the Carlyon House and the Ayer Duplex, including a lengthy Request for Proposals process in the summer 2021. Four respondents subsequently performed required due diligence with City of Olympia, relocation contractors, and bankers. One respondent continued his feasibility analysis well into 2022 with the final determination that the relocation and renovation project on his two vacant real estate parcels was neither financially nor logistically possible. DES will move forward with the deconstruction and salvage of existing building materials.

Additionally, a three-party Memorandum of Understanding was executed on Oct. 5, 2022, between Washington State Senate; Department of Archaeology and Historic Preservation; and Department of Enterprise Services for "...mitigation and removal of Newhouse (Highways) Building, Hanson/Ayer Duplex; and Carlyon House as part of the Legislative Campus Modernization Project."

3. **SCNA Comment:** The mitigation in the SEPA checklist includes good actions, including additional efforts to relocate the press houses and further research into the work of Elizabeth Ayers [sic]. The same kind of attention should be given to the Pritchard building.

LCM Response: Comment noted.

4. **SCNA Comment:** While we are happy that Pritchard will be preserved, its renowned design and rich history need to be recognized and preserved.

LCM Response: Comment noted. LCM will work closely with Department of Archaeology and Historic Preservation to scope a project that comports with the Secretary of the Interior's requirements.

5. **SCNA Comment:** As a mitigation measure, we recommend a compilation of the history of the original Pritchard Library, including interpretive material recognizing the art murals, architect Paul Thiry, former Lieutenant Governor Joel Pritchard, for whom the building was named, and State Librarian Maryan Reynolds, who was instrumental in creating the State Library as well as other state librarians who followed.

LCM Response: Comment noted.

6. **SCNA Comment:** Documentation on site for the roles played by State Librarian Maryan Reynolds in working with architect Paul Thiry to build the Pritchard Library and selecting the art.

LCM Response: LCM and DLR Group are using Maryan E. Reynolds' book [The Dynamics of Change: A History of the Washington State Library](#) as design criteria are developed.

7. **SCNA Comment:** Landscaping to reflect the previous residential character of the site. The area that currently contains the press houses has been residential and future landscaping as part of the Newhouse replacement project should reflect this.

LCM Response: Newhouse landscape design and plant selections are discussed in both the Plants and Land and Shoreline Use sections in this comment response document. Continued stewardship of the Olmsted landscape plans, as well as extension of said concepts and recommendation, are incorporated both into the Newhouse design; DES horticultural operations; and Pritchard work. LCM Landscape Peer Review Panel is reviewing and guiding ongoing discussions and recommendations.

8. **SCNA Comment:** The state should provide a visitors center to replace the services of the former visitors center and State Capitol Museum. This function is essential for the many people who visit our state capitol throughout the year. Inadequate facilities for information, interpretation, and orientation of visitors currently exist.

LCM Response: The building on the northeast corner of Opportunity Site Six commonly referred to as the 'Visitor Center' was never operated by the State with the purpose of providing visitors with orientation to the campus; the building was leased to Experience Olympia and Beyond dba Thurston County's Olympia-Lacey-Tumwater Visitor and Convention Bureau office. These services ended on September 30, 2019, when the tenant closed the office. Mitigation for the closure of the building is not included in LCM Project scope.

9. **SCNA Comment:** The area of the former Capitol Conservatory has been a blight since its demolition in 2008. This site should be landscaped to return its use to the public in another way.

LCM Response: While other sites on the Capitol Campus are outside the LCM Project scope, comment is noted.

Transportation

1. **SCNA Comment:** To improve security for Newhouse replacement DES proposes to add security gates to the surrounding parking lots and prohibit through-traffic on Water Street SW between Sid Snyder Avenue and 15th Avenue SW. Initially, during the construction period, this will be accomplished with gates but followed up later with a permanent method of closure. The checklist notes that Water Street will be closed at times during construction. The Memorandum of Understanding should include notification to the SCN when this will occur.

LCM Response: Thank you for your comment regarding a Memorandum of Understanding between DES and SCNA. An MOU does not fall under the purview of the SEPA process. However, any changes in the construction schedule will be posted on the DES LCM project website.

2. **SCNA Comment:** Connected streets are important to the City and the State Capitol Campus. The State Capitol is supported by City services and fully integrated into the surrounding community. The checklist fails to recognize that streets on the Capitol Campus are part of the City's valued gridded street system. The City's comprehensive plan stresses the importance of a gridded street system that functions to reduce vehicle trips and supports making the street system friendlier to all modes of transportation.

LCM Response: Comment noted. The portion of Water Street SW proposed for closure is owned by the State of Washington. The proposed closure is a security measure that would only affect unauthorized vehicular traffic. The street would continue to accommodate authorized traffic, pedestrians, and bicyclists.

3. **SCNA Comment:** The gridded street system in the SCN is what the City is trying to maintain and build throughout its other commercial and residential areas. Water Street is an integral part of that system providing an alternate route to and from Capitol Way for residents and those who work on the Capitol Campus.

LCM Response: DES will work with the City of Olympia to design how Water Street SW is closed at 15th Avenue SW. See Transportation response 2 (above).

4. **SCNA Comment:** It also provides an alternate route for vehicles and emergency responders when Capitol Way is blocked due to protests, demonstrations, parades, or natural disasters.

LCM Response: Emergency access is being studied as ongoing campus traffic patterns and possible revisions are considered outside the scope of LCM SEPA process.

5. **SCNA Comment:** Principle 3.1 of the State Master Plan states, "The intent of this policy is to maintain and enhance the vitality of the communities within which state facilities are located, and to support the comprehensive plan goals of these communities."

LCM Response: State's support of Principle 3.1 of the Master Plan is fully considered in the LCM Project scope. The vitality of the City of Olympia and the South Sound region benefit the public's access and participation in events on the Capitol Campus; likewise, stewardship of the historic campus draws members of the public, tourists, political participants, and experts' viewing of architecture and landscape. The dual synergy between town and Capitol Campus is valuable to residents and businesses.

6. **SCNA Comment:** Security protocols for the Newhouse replacement are inconsistent with those of nearby buildings – including the Helen Sommers, Pritchard, Cherberg, and Insurance Buildings.

LCM Response: Campus security is outside the scope of the SEPA process, which is to evaluate potential environmental impacts (and benefits) of the project and to inform decision-makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. Campus security protocols are addressed by DES Capitol Security and Visitor Services, the Washington State Patrol, and other campus security partners.

7. **SCNA Comment:** Drop arms protect parking spaces. Drop arms won't stop a vehicle from driving into the building.

LCM Response: Campus security issues are outside the scope of the SEPA process. However, recent security recommendations included drop-arm barriers as a way to deter unauthorized traffic into staff parking lots.

8. **SCNA Comment:** Drop arms are unwelcoming and exclusive.

LCM Response: Comment noted.

9. **SCNA Comment:** Restricting parking year-round fails to recognize that legislative needs are most intense for a few months each year.

LCM Response: Almost all parking currently located on the Newhouse, Press House sites, and Visitor Center are marked as "Reserved." Some of these spaces, particularly those in the Visitor Center lot, could be available for public parking when the legislature is not in session and/or on weekends. The LCM Transportation Technical report recommended that DES address its policies related to reserving individual stalls, and to identify short-term visitor parking needs in review of the overall Capitol Campus parking strategies. Actual mitigation measures implemented will be determined by permits issued for the project by DES, not the LCM project.

10. **SCNA Comment:** Parking policies elsewhere on the Capitol Campus do not require drop arms.

LCM Response: Capitol Campus parking policy and operations are outside the scope of the LCM Project. Additionally, campus security is outside the scope of the LCM SEPA process as discussed in Transportation responses 6 and 7 (above).

11. **SCNA Comment:** How will visitors be informed of where they can park and why the street has been closed?

LCM Response: DES maintains the Capitol Campus Interactive Map (<https://des.wa.gov/capitol-campus-interactive-map>) informing visitors of existing parking locations and travel directions. Information is updated as conditions change. Signs are posted at freeway exits and on arterials near campus.

12. **SCNA Comment:** Principle 1 of the 2006 Master Plan relating to Public Use and Access states as a goal "...that security measures that are as seamless and transparent as possible".

LCM Response: Comment noted. Please see comment response to Transportation responses 6 and 7 (above).

13. **SCNA Comment:** The 2009 WCHLPP states: "The goal is to reduce, and eventually eliminate, the majority of dedicated surface parking so that this valuable landscape may be enlisted toward higher use."

LCM Response: LCM parking requirements are mandated by proviso (Section 6024 of the 2021 Capitol Budget SHB 1080 SL, Section 5, item II). The LCM project is charged with minimizing the loss of existing parking stalls, while softening the visual impact of required surface parking lots.

14. **SCNA Comment:** The caution is to avoid inadvertently displacing the impact of vehicular parking to adjacent areas, such as the South Capitol Neighborhood Historic District.

LCM Response: The *LCM Transportation Technical Report* (SEPA Checklist Appendix B) described the City of Olympia's Residential Parking Program that includes streets in the South Capitol Historic Neighborhood. This limits parking duration to 1 or 2 hours except with a permit, which only residents of the neighborhood can obtain. Except for eliminating a few spaces on Columbia Street SW, which are technically already controlled by the State (and not the City of Olympia), no changes to the residential parking program will result from the proposed project and it will continue to discourage non-residents from parking in the neighborhood.

15. **SCNA Comment:** The LCM will increase impervious surface including parking on the property where the Press House and Carolyn House will be removed. This is not in keeping with the goal of the 2009 WCHLPP.

LCM Response: Gravel parking lots are considered impervious surfaces. Analysis in the SEPA Checklist (Section B.1.g) estimated that Opportunity Site 6 is currently 60 percent impervious, and with the proposed redevelopment, that could increase to 65% impervious.

16. **SCNA Comment:** The LCM should build upon the 2006 Campus Master Plan and the original Wilder & White and Olmsted Brothers vision for the campus by further reducing surface parking to minimal essential use.

LCM Response: The LCM Project incorporates elements of the master plan and Olmsted guidelines where possible and practicable while meeting the required site program parking requirements mandated by proviso (Section 6024 of the 2021 Capitol Budget SHB 1080 SL, Section 5, item II). Overall, the LCM Project will result in a net loss of between 57 to 65 spaces on West Campus.

17. **SCNA Comment:** This could be accomplished by using parking available in the East Campus parking structure as the Heffron Report recommends and other parking capacity resulting from changes in workforce patterns. The Heffron report details DES work on evaluating the use of the East Campus Parking structure.

LCM Response: Mandates regarding workforce behaviors are outside the scope of the LCM SEPA process; again, parking counts are required in the enabling proviso.

18. **SCNA Comment:** Currently (post-pandemic), at peak times, 83 percent of parking stalls in the East Campus Parking structure are available, which is equivalent to about 2,000 available parking spaces. This far exceeds the amount of LCM parking projected to be constructed on the West Campus.

LCM Response: LCM projects are required by proviso to include adequate and safe parking convenient to legislative buildings during session. DES Parking Study is underway to review parking and commute issues

19. **SCNA Comment:** It is ironic the LCM proposes to construct surface parking to the West Campus, the most historic part of the Capitol Campus, while the more modern East Campus has minimal surface parking to mar its landscape.

LCM Response: Comment noted. LCM subprojects will not add parking to the West Campus. The combined Pritchard and Newhouse Building projects will reduce parking by 57 to 65 spaces compared to current conditions. Displaced parking will be shifted to Plaza Parking Garage.

20. **SCNA Comment:** Surface parking is the least cost-effective way to provide LCM parking.

LCM Response: Comment noted. The proviso requirements of the LCM Project were in response to parking requirements during sessions.

21. **SCNA Comment:** The LCM states that 57 to 65 parking stalls will be lost due to the Pritchard expansion. The Heffron Report also analyzes the loss of parking spaces due to construction of Newhouse replacement and concludes that this loss as well as parking for construction workers can be accommodated in the East Campus Plaza Garage.

LCM Response: There will be some temporary displacements of parking lots during construction. At that time, the employees in the respective buildings will also be displaced, primarily to the new modular building. The long-term parking requirement is set by the proviso.

22. **SCNA Comment:** Construction on the Newhouse site would also temporarily eliminate all parking on that site, as well as on the Visitor Center site, which is anticipated to be used for construction staging. As listed previously in Table 3, the combined sites currently have 195 parking stalls. When combined with the parking lost in the Mansion Lot, the total parking eliminated during construction would be 247 stalls.

LCM Response: See Transportation response 19 (above).

23. **SCNA Comment:** There is sufficient parking available on campus to accommodate the cumulative loss of parking during construction, as well as demand from construction workers. Encouraging employees to utilize alternative modes of transportation and updating parking assignments to reflect the loss of parking are two measures recommended to occur prior to start of construction.

LCM Response: Comment noted.

24. **SCNA Comment:** We like the Heffron report recommendation that these parking spots be accommodated in the Plaza Garage.

LCM Response: Comment noted.

25. **SCNA Comment:** The LCM checklist states that 57 to 65 parking stalls will be lost due to the Pritchard expansion (Heffron, p. 10). We like the Heffron report recommendation that these slots be accommodated in the Plaza Garage (Heffron report, p. 43, 44). If employees are going to make this transition, it is imperative that DES institute the following recommendations in the Heffron Report to increase the use of the Plaza Garage by enhancing the pedestrian connection between the West Campus and the Plaza Garage and improving users' perceptions.

LCM Response: Comment noted. Recommendations in the Heffron report are being considered by the DES Parking Study Workgroup.

26. **SCNA Comment:** Improve the walkway that connects to the Capitol Way Pedestrian Bridge through the Visitor Parking lot.

LCM Response: Comment noted, and design work is part of the Newhouse project for graceful connections across the site to the pedestrian bridge.

27. **SCNA Comment:** Improve interior lighting and elevator efficiency, including adding wi-fi connection.

LCM Response: Comment noted and shared with DES/FPS/PPD and Building and Grounds for continued updates to the Plaza Parking Garage.

28. **SCNA Comment:** Upgrade pedestrian way finding between the Plaza Garage and West Campus, particularly for pedestrians returning to the garage and its many elevator access points.

LCM Response: Comment noted. Major project is near launch for campus-wide signage upgrades.

29. **SCNA Comment:** Work with City of Olympia to improve signage directing motorists to visitor parking in the Plaza Garage.

LCM Response: Comment noted. Major project is near launch for campus-wide signage upgrades.

30. **SCNA Comment:** Provide information about Capitol Campus parking as part of event permits, employee onboarding, and on public websites. Information should direct visitors to off-street parking locations and discourage on-street parking in the South Capitol Neighborhood Historic District.

LCM Response: Comment noted and shared with DES leadership and work groups.

31. **SCNA Comment:** When demand warrants, re-institute the employee shuttle between the Plaza Garage and the West Campus. We (SCN) would recommend expanding the shuttle service to serve others participating in the legislative process when the Legislature is in session.

LCM Response: Comment noted.

32. **SCNA Comment:** Update the following campus-wide parking policies and operating procedures.

LCM Response: Comment noted.

33. **SCNA Comment:** Change the assignment / reservation of individual parking stalls (necessitated by reduction of LCM parking).

LCM Response: Comment noted.

34. **SCNA Comment:** We also like some of the Heffron Report's recommendations to improve campus parking policies:

- Identify the number and location of visitor parking stalls. Some short-term (4 hours or less) visitor stalls should be retained in the West Campus area to reduce the potential for visitor overspill into the adjacent residential neighborhood.
- Review the location and number of accessible and disabled-permit signed (ADA) stalls and managing supply of those stalls on a campus-wide basis. Consider consolidating accessible stalls in central locations that can serve multiple buildings.
- Create a new type of employee parking pass to allow parking on fewer days than a monthly pass (for those who regularly work from home one or more days per week).
- Implement policies that spread work-from-home days over the full week (rather than concentrated on Monday or Friday).
- Continue to monitor parking use of the Plaza Garage. Consider updating the Campus-wide Parking Study when Plaza Garage occupancy exceeds 80 percent.
- We note, however, that these are only recommendations. Both the recommendations in the Heffron Report for improving perception and accessibility of the Plaza Garage and for changes in campus parking policies should be included as mitigating measures.

LCM Response: Comment noted. Recommendations in the Heffron report are being considered by the DES Parking Study Workgroup.

35. **SCNA Comment:** We think that monitoring of the use of the Plaza Garage by legislative employees should begin at the onset of the move into the temporary modular buildings, especially during the dark, rainy winter months.

LCM Response: Comment noted.

36. **SCNA Comment:** Some of the recommendations such as a shuttle service may need to be started sooner rather than later.

LCM Response: Comment noted. Comprehensive transportation planning is outside the scope of LCM SEPA process. Many transit and shuttle services were reduced or eliminated in 2020 because of COVID-19 impacts, when nearly all Capitol Campus employees worked from home. Return of those services will depend on demand and hybrid work policies implemented by State agencies in the future. DES internal parking workgroup will collaborate with Intercity Transit and City of Olympia on the re-establishment of shuttle services as needed and funding allow.

37. **SCNA Comment:** The Heffron Report estimates that after more employees return to work when pandemic restrictions are eased, about 20 percent will continue part-time work from home, equating to one day per week (Heffron report, p. 44). As we noted above in the Air section of our response, a mitigating measure of a robust telework program and the promotion of the current commute reduction program could increase this target to at least 40 percent.

LCM Response: Return to work and hybrid work policies will continue to evolve, will likely differ depending on the State agency, and may change throughout any given year. Your comment is acknowledged. However, implementation of these policies is both outside the authority of DES and beyond the scope of the LCM SEPA process.

38. **SCNA Comment:** The strategy that the commute reduction program uses to promote alternative modes of transportation should be detailed to expand success.

LCM Response: Comment noted.

Public Services

No comments submitted for this category.

Utilities

No comments submitted for this category.
