

**Legislative Campus Modernization
Newhouse Building Replacement Project
SEPA Environmental Review Public Comment and Response
Nov. 18, 2022**

Overview

Responses to comments provided in this attachment address environmental issues raised during the public comment period for the draft Newhouse Building Replacement Project State Environmental Policy Act (SEPA) Checklist. The Department of Enterprise Services (DES) released the draft environmental review for comment on Sept. 2, 2022. The 14-day comment period ended on Sept. 16, 2022.

A total of 102 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 – 10 Comments.....	2
Earth – One Comment	4
Air – Four Comments	4
Water – 10 Comments	6
Plants – 13 Comments	9
Animals – No Comments.....	12
Energy and Natural Resources – No Comments.....	12
Environmental Health – Nine Comments	12
Land and Shoreline Use – 21 Comments	16
Housing – No Comments	22
Aesthetics – Two Comments	22
Light and Glare – One Comment.....	24
Recreation – No Comments.....	25
Historic and Cultural Preservation – 10 Comments.....	25
Transportation – 21 Comments.....	29
Public Services – No Comments.....	36
Utilities – No Comments	36

General – 10 Comments

1.) South Capitol Neighborhood Association (SCNA) Comment

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

2.) SCNA Comment

Specification of 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 change before construction starts.

3.) SCNA Comment

Specification of how and who will be contacted in the SCN if there are changes to hours of construction and noise levels.

4.) SCNA Comment

Specification of contact person with phone number and email address for contacts at DES and the construction crew for SCN to contact about construction impact concerns.

5.) SCNA Comment

Notification of the SCN when closure of Water Street will occur during construction.

LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

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LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

6.) SCNA Comment

Commitment to a discussion with the SCN of how potential impacts of light and glare from the project will be avoided and a commitment to institute these measures.

7.) SCNA Comment

Continued involvement of the SCN Workgroup in LCM decisions related to softening and camouflaging mass and scale of the Newhouse Building and surface parking lots.

8.) SCNA Comment

A system for handling other concerns that may occur during the design and construction phases.

9.) SCNA Comment

The Newhouse Building Replacement Project has been given the environmental designation of Determination of Non-Significance. We believe that the designation should be Mitigated Determination of Non-Significance.

10.) SCNA Comment

Many of the suggested mitigations included in the checklist are merely recommendations with no commitment to implement them. We also would like to see a commitment to institute the mitigations we have suggested.

LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

LCM Response for Comments 1-8

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 construction schedule would be posted on the DES LCM project website.

LCM Response

Comment noted. The determination issuance is determined by the DES Lead Agency upon review of a completed SEPA checklist.

LCM Response

The mitigation measures included in the Newhouse SEPA checklist are recommendations only. Actual mitigation measures would be mandated by the permits issued for the project.

Earth – One Comment

1.) **Evan Wood, 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. A certified erosion control lead (CESCL) will be on-site during construction to ensure that erosion control measures are maintained.

Air – Four Comments

1.) **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 rebuilt Newhouse Building 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 capital project funding request for formal parking study and future strategies. Current internal review 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 Newhouse Building Replacement; however, the issue is part of DES comprehensive planning work.

2.) 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 (Heffron Report) assumes the “worst-case” scenario, which is that almost all the new building will be occupied, and that 60 percent of building occupants will drive alone to work. Based on these “worst-case” assumptions, the new Newhouse building will cause an increase of 390 daily vehicle trips.

State government can do better than this via proactive policies to promote alternatives to single occupancy vehicles. Before the pandemic, fewer than 5 percent of Capitol Campus employees reported they worked from home. Now, conditions are ripe for wide ranging telework programs. For Newhouse, this is especially true when the Legislature is not in session. Although 47.6 percent of employees in state executive branch agencies are eligible to telework, only 23.7 percent take advantage of this option. Greatly increased reliance on remote work should be included in the SEPA checklist as another air pollution mitigation measure.

3.) SCNA Comment

To help preclude the worst-case, the Legislature should develop a robust telework program during the interim period between legislative sessions. Such a program will reduce both air pollution and the amount of additional office space needed to meet the design elements of a future workspace environment. We are hopeful that can happen.

LCM Response

The worst-case trip generation estimates in the Transportation Technical Report provided with the SEPA Checklist reflect a long-term future condition in which the additional space provided in the Newhouse Replacement Building could support much higher levels of employment than currently exist. However, the Newhouse Building will accommodate the same number of legislators and staff who currently work in the existing Newhouse and Pritchard Buildings. These staff members already commute to the campus each day. In the long-term, campus-wide measures to reduce parking demand would reduce trips and potential air pollution (see response to Air Comment 1).

LCM Response

See responses to Air Comments 1 and 2.

4.) SCNA Comment

The air pollution mitigation measures cited above 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 Newhouse Building Replacement project. See Air Comment 1 (above) for Department of Enterprise Services work on the issue.

Water – 10 Comments

1.) Evan Wood, Department of 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) and best management practices (BMPs).

2.) Evan Wood, Department of Ecology Comment

The following construction activities require coverage under the Construction Stormwater General Permit:

LCM Response

Newhouse Building Replacement project activities will be conducted under a Construction Stormwater General Permit (CSWGP) that will be obtained before ground-disturbing activities start. All required measures will be taken to protect state waters.

3.) Evan Wood, Department of Ecology Comment

Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State?

LCM Response

See Water Comment Response 2 (above).

4.) Evan Wood, Department of 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; and

LCM Response

Conversions will not occur. There are no forested areas on the project site.

5.) Evan Wood, Department of Ecology Comment

Any size construction activity discharging stormwater to waters of the State that Ecology:

LCM, Response

Comment noted.

6.) Evan Wood, Department of Ecology Comment

Determines to be a significant contributor of pollutants to waters of the State of Washington.

LCM Response

Comment noted.

7.) Evan Wood, Department of Ecology Comment

Reasonably expects to cause a violation of any water quality standard.

LCM Response

Comment noted.

8.) Evan Wood, Department of 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.

9.) Evan Wood, Department of 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 serving the west half of the project site (Opportunity Site 6) discharges to Capitol Lake, which is on the State's 303(d) list for total phosphorous, fecal coliform bacteria, and ammonia-N. None of these will result from Newhouse construction activities and will not be entrained in construction stormwater discharge that could reach Capitol Lake.

10.) Evan Wood, Department of 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 before land-disturbing activities occur.

Plants – 13 Comments

**1.) SCNA Comment
Vegetation**

The checklist includes proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site if any:

Many new trees will be planted, and the new shrubs and ground covers will be drought tolerant native and adaptive species with many pollinator plant species. The planting plan will respect the Olmsted legacy on the Capitol Campus.

The checklist does not include mention of what will happen with the historical elm outside the Carlyon residential building or the three very tall mature willows and the monkey tree along 15th between Columbia and Water. These should be preserved.

LCM Response

Native and adaptive plant species (many pollinators) that respect the Olmsted legacy and match existing trees and plantings on adjacent Campus sites are proposed for this project. The Landscape Peer Review process continues, and the planting design refinement will continue.

Efforts were made to save the Elm tree; however, it was determined that the Elm would have to be removed for the following reasons:

>The finished grades of the Carlyon site are significantly raised above the surrounding sidewalks and adjacent properties. The building design requires the lowering of all the grades (about 4 feet) in the location of the Elm tree.

> The Elm tree is growing on top of a 5-foot-tall retaining wall leading to the garage. This condition is not structurally ideal because all the roots are located under half of the canopy and are not evenly spread-out.

> The arborist report listed the condition of the tree as only 'Fair'.

The three birch trees and the Monkey Puzzle tree will be preserved.

2.) SCNA Comment

Although we appreciate the landscape firm’s choice of plantings, we think much more could be done to support the conclusion that the “planting plan [on the east portion of Opportunity Site 6] will respect the Olmsted legacy on the Capitol Campus”.

LCM Response

Newhouse landscape design includes new tall and native trees that were selected to extend original Olmsted concepts. Refinement of the design continues, and the LCM Landscape Peer Review Panel’s counsel and guidance offer objective feedback.

3.) SCNA Comment

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 the Olmsted legacy. The current landscape plan is limited by the large areas of surface parking.

LCM Response

LCM Landscape Peer Review Panel’s counsel and guidance on saving and replacing trees on the Newhouse site is underway and will continue with the Pritchard project.

4.) SCNA Comment

We appreciate DES consulting with known experts on Olmsted design principles and hope this continues.

LCM Response

See Transportation Comment Responses.

5.) SCNA Suggested Mitigations

Eliminate surface parking south of Newhouse and along Water Street SW to allow 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 landscape plan saves many large existing trees and proposes new native large trees and understory plantings as recommended in the 2009 West Campus Landscape Preservation Plan. Work continues on replacement tree options. The Newhouse Building Replacement project meets the proviso-required building area and parking numbers.

6.) SCNA Suggested Mitigations – Vegetation

Eliminate parking by relocating assigned parking spaces to other parking areas available on the Capitol Campus.

LCM Response

See Transportation Comment Responses.

7.) SCNA Suggested Mitigations

Provide shuttles and other resources to make the parking convenient and safe.

LCM Response

See Transportation Comment Responses.

8.) SCNA Suggested Mitigations – Vegetation

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.

9.) SCNA Suggested Mitigations – Vegetation

Enhance vegetation on Site 6 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 Newhouse landscape plan while upholding continued stewardship of the Olmsted landscape legacy.

10.) SCNA Suggested Mitigations – Vegetation

Preserve the historic elm tree outside the Carlyon residence.

LCM Response

See Plant Comment Response 1 (above).

11.) SCNA Suggested Mitigations – Vegetation

Preserve the three old very tall willows and monkey tree behind the Newhouse Building during sidewalk reconstruction.

LCM Response

See Plant Comment Response 1 (above).

12.) SCNA Suggested Mitigations – Vegetation

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

There currently is no parking screening on 15th Ave SW and there is some screening along Sid Snyder. The proposed parking buffer screening will be a minimum of 10 feet along 15th Avenue SW, with large trees and buffer plantings. The parking along Sid Snyder is set back with proposed stand of gateway entry trees and shrubs to screen the parking. Please note that parking screening will allow some spaced/broken site line views into the parking areas for security and safety requirements.

13.) SCNA Suggested Mitigations – Vegetation

Continue to consult with Olmsted experts on landscaping site 6.

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 will provide counsel and comment toward continued stewardship of the Olmsted landscape legacy on the Capitol Campus.

Animals – No Comments

No comments received for this category.

Energy and Natural Resources – No Comments

No comments received for this category.

Environmental Health – Nine Comments

1.) Tara Davis, Department of 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, such as PCB-containing lamp ballasts, fluorescent lamps, and wall thermostats containing mercury, are removed prior to demolition.

LCM Response

Hazardous (Regulated Building) Materials project specification 02 80 00, Division Section 010 will be followed during demolition activities. Newhouse GC/CM (Hoffman Construction) will hire an abatement contractor for the demolition. The abatement contractor will prepare and follow an Abatement Work Plan.

2.) Tara Davis, Department of 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, Department of 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 contract 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, Department of Ecology Comment

Please review the “Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes,” posted at Ecology’s website, <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Construction-and-demolition> . The applicant may also contact Rob Rieck of Ecology’s Hazardous Waste and Toxics Reduction Program at (360) 407-6751 for more information about safely handling dangerous wastes and demolition debris.

LCM Response

Comment noted. Hoffman Construction will follow all rules for managing, removing and disposing of potentially dangerous or hazardous building materials generated during demolition of the Press Houses and Newhouse Building.

5.) Derek Rocket, Department of 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. It is important that these materials and wastes are removed and appropriately managed prior to demolition. 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. Please review the “Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes,” on Ecology’s website at: Construction & Demolition Guidance. All removed debris resulting from this project must be disposed of at an approved site.

LCM Response

First portion of this comment was addressed in Environmental Health Comment Response 2.

6.) Derek Rocket, Department of Ecology Comment

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

7.) Thomas Middleton, Department of 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

Regarding grading and filling, only non-contaminated (i.e., clean) fill will be used. Clean materials from the site that are considered as reuse for fill material may be considered solid waste and Hoffman Construction will comply with Thurston County's Public Health & Social Services Environmental Health division's requirements before using such materials as fill on site.

LCM Response

Comments noted and these requirements will be followed by DES or their consultant(s) if contamination of soil or groundwater is suspected, discovered or occurs during the Newhouse project.

8.) SCNA Comment - Toxic Materials

The document addresses specifically regulated hazardous chemicals, asbestos, PCBs, and lead-based paint in Newhouse, 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. These materials need to be disposed of properly. 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. Miller Hull's expertise and experience in safer building materials should be utilized.

9.) SCNA Comment Noise

Construction noise will impact the SCN. 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 change before construction starts.

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. Newhouse Building Replacement abatement will follow all regulations for removal and proper disposal of existing materials and products in the existing structures.

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, any changes in construction schedule would be posted on the DES LCM project website.

Land and Shoreline Use – 21 Comments

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 Newhouse Building Replacement project follows 2006 and 2009 planning guidelines by incorporating the following from the 2006 Master Plan: Preserving open spaces, defining campus entry at Sid Snyder Avenue SW and Capitol Way South, protecting historic view corridors, recognizing the Legislative Building as the Campus' predominant feature, siting the building with the central main entry on Sid Snyder Avenue SW, all while providing unique opportunities for works of art from ArtsWA "Art in Public Places" to be incorporated within the site and building. Additionally, earlier planning guidelines were followed in establishing contemporary design strategy using contemporary materials and construction methods to blend with the historic architectural style of the West Campus. The existing geometric proportions, structural bay spacing, and vertical pillars have been studied carefully and translated into the new building to ensure the design relates harmoniously with the historic Capitol Campus. The design team recognizes this new 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, yet reinforce, the organizational axes of West Campus. The 2006 and 2009 planning documents provide guidelines. However, the project also was designed to comply with legislative requirements. Section 1111 of the 2021 Capitol Budget SHB 1080 SL, Section 4, Part (b) states that

"(b) 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 The Master Plan includes such direction as:

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 plans and follows the 2006 and 2009 planning guidelines. The proposal does not change the existing land use from legislative functions on the Capitol Campus. The Newhouse Building Replacement project will accommodate the same number of legislators and staff who are already officed in the existing Newhouse and Pritchard Buildings. Consolidating staff into the replacement building requires a larger building footprint; hence, existing entire west half of Opportunity Site Six must be cleared.

3.) SCNA Comment

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

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.

5.) SCNA Comment

Although the Newhouse checklist 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 Newhouse Project does not conform to important principles and policies in the Planning Documents that would accomplish effective and appropriate integration of the Newhouse site with the rest of West Capitol Campus and a smoother transition to the surrounding community (South Capitol Neighborhood).

6.) SCNA Comment

These guiding design elements in the Master Plan should be carefully considered: Site new buildings as part of the existing open space/landscape pattern.

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 & Shoreline Use comment response 1.

LCM Response

As described in Land & Shoreline Use Comment Response 1, the Newhouse Replacement Building design applied several principles in the 2006 Master Plan. The 2009 West Campus Historic Landscape Preservation Master Plan was used to directly inform selection of trees, understory, and groundcover on the site. The planting design continues to evolve with continuing LCM Landscape Peer Review Panel oversight.

LCM Response

Refer to Land & Shoreline Comment Response 4.

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 pulled away from street edges in order 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.

7.) SCNA Comment

Create physical and visual transitions to the urban and natural context at Campus perimeter.

8.) SCNA Comment

Define gateways and reinforce seams between campus and neighborhoods with attention to pedestrians and views.

9.) SCNA Comment

Create strong relationships between the historic Capitol Group and the South Capitol Neighborhood.

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.

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.

LCM Response

The siting of the new building 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).

10.) SCNA Comment

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

11.) SCNA Comment

The 2006 Master Plan repeatedly calls for sensitivity to the edge between the Campus and SCN:

Development of the South Edge must reinforce the organization of the West Campus, as a whole.

LCM Response

On Opportunity Site Six, landscape buffers are provided as described in Land & 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.

LCM Response

Building development along the south edge 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.

12.) 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. "New buildings should be designed and constructed to be consistent with the historic architectural context of the original Capitol grouping. New buildings should complement the classically inspired architectural and spatial relationships between buildings. All new buildings must recognize the Legislative Building as the Capitol complex's predominant feature."

13.) 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 Newhouse Building Replacement SEPA process.

14.) SCNA Comment

The following statements from the 2009 West Campus Historic Landscape Preservation and Vegetation Management Plan (2009 HLP) also provide guidance: 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

The siting of Newhouse was chosen to better frame views along Sid Snyder Avenue SW and offer wide, expansive views of the Great Lawn to building occupants. Siting also considered more technical criteria such as pedestrian walkways, security setbacks, required parking, site circulation for daily and emergency vehicles, as well as accessible routes to the building entries.

15.) SCNA Comment

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

16.) 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.

17.) 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.

18.) 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

Landscaping with tall trees, rich understory, and groundcover is a character defining feature of the entire South Sound region, including the proposed Newhouse Building Replacement site. The project incorporates hundreds of new plants of all heights and protects existing mature trees across the site. The 2009 West Campus Historic Landscape Preservation Master Plan has guided every decision on the Newhouse Building Replacement project.

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.

LCM Response

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

LCM Response

While SEPA does not require response to this particular parking issue, 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 occur as a result of the proposed project.

19.) SCNA Suggested Mitigation

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 & Shoreline Comment Responses 1, 6, 7, 15, and 17 above.

20.) SCNA Comment

Look for landscape solutions to soften and camouflage the mass and scale of the Newhouse replacement.

LCM Response

See Land & Shoreline Comment Responses 1, 6, 7, 15, and 17 above.

21.) SCNA Comment

Rather than an antiquated surface parking lot behind Newhouse, create a healthy and environmentally sustainable ecosystem that will be enjoyed by public visitors, elected officials, and State employees.

LCM Response

The parking count is mandated by legislative proviso. Newhouse project is charged with meeting that statute, while still seeking to minimize the visual impacts of surface parking.

Housing – No Comments

No comments received for this category.

Aesthetics – Two Comments

1.) SCNA Comment

We support having the Newhouse replacement oriented to Sid Snyder 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

Newhouse Building Replacement was sited to frame views along Sid Snyder Avenue SW to the Legislative Building while maximizing light and connection to nature from the building interior. The project collaboration is leading to a contemporary architecture built of materials that are compatible and complementary to the historic Capitol Group.

2.) 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. 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 height of the Newhouse Building Replacement structure will remain 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. The historic geometric proportions, spacing of bays, and vertical pillars have all been studied and translated into the scale and proportions of the new building 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.

Light and Glare – One Comment

1.) SCNA Comment

The checklist says 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 discussed earlier in this SEPA Checklist (General and Land & Shoreline Use), a Memo of Understanding (MOU) between DES and South Capitol Neighborhood Association (SCNA) is not part of the formal SEPA process. However, Newhouse Building Replacement project staff will share review documents and collect SCNA comments as part of the construction document (CD) submittal process. DarkLight, Miller Hull's lighting subconsultant, is in alignment and agreement with the checklist's lighting goals to maintain safety and aesthetics and design while avoiding impacts to neighborhood. The draft and ongoing design will continue to support these goals for both indoor and outdoor lighting; all fixtures and fixture layouts for the Newhouse project have been intentionally selected to meet all the lighting checklist goals. Exterior lighting, which often causes noticeable failures in glare and site impact, has been selected and designed for light spill and glare ratings well below the Illuminated Engineer Society (IES) and International Dark-Sky Association recommendations and requirements. The CD process will include a detailed discussion between DarkLight and the Miller Hull site design team regarding the lighting site plan 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, a document will be provided by DarkLight that outlines the approach to site lighting across the project site. This document will include a detailed description of the photometric details on each exterior light fixture selection and information regarding the fixtures light spill and glare control means and methods.

Recreation – No Comments

No comments received for this category.

Historic and Cultural Preservation – 10 Comments

1.) **Greg Griffith, President OHS-BHM Comment**

In 13 (d) regarding the list of meetings to brainstorm and prioritize possible mitigation strategies for loss of the Newhouse Building and two press houses, I know the Olympia Historical Society-Bigelow House Museum (OHS-BHM) was left out of the May 18, 2022 meeting with "historic preservation advocacy organizations, and local community and neighborhood stakeholders." If future stakeholder meetings are planned, please invite OHS-BHM as an interested party (olyhistory@gmail.com).

LCM Response

Thank you for your comment. LCM Stakeholders Meetings are held monthly and are posted on the DES website.

2.) **Greg Griffith, President OHS-BHM Comment**

In 13 (d) 1 (a), I strongly support and commend DES efforts to relocate the two Press houses (Carlyon House and Ayers Duplex) and strongly support continued efforts to find a new, compatible site and a successful relocation strategy as mitigation for their removal from the Capitol Campus.

LCM Response

Department of Enterprise Services managed extensive public outreach to facilitate the removal and relocation of both the Carlyon House and the Ayers Duplex, including a lengthy Request for Proposals process in 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 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 deconstruction and salvage of existing building materials.

3.) Greg Griffith, President OHS-BHM Comment

Also, in regard to 13 (d) 1 (a), while I strongly support relocation and preservation off-site as mitigation for the Press houses, I am strongly opposed to salvage and demolition of these 2 buildings. I make the case that Carlyon and Ayers are well worth the effort of DES (together with other interested parties) to conduct a sustained, broad-based, and focused relocation effort and, in turn, to remove salvage/demolition as a mitigation measure. Clearly, Ayers and Carlyon are residential in character and curiously have survived for decades amongst the Capitol Campus' staid architecture. However, the distinctiveness of these two residences give a texture and interesting contrast to the monolithic architecture elsewhere in the campus historic district. In addition, the Press houses are complex and multi-faceted in their significance, both in terms of architecture and history. The histories and stories of these buildings are deeply intertwined not only with state government but also with Olympia history, and persons significant to our past. If demolished, this rich history and architectural character will be a large loss to the community.

LCM Response

See Historic & Cultural Preservation Comment Response 2.

Additionally, a three-party Memo 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."

The enabling legislation for the Legislative Campus Modernization Project (legislative proviso Section 1111 of the 2021 Capital Budget, SHB 1080.S) included the following language:

(10) The department may sell by auction the Ayers and Carlyon houses, known as the press houses, separate and apart from the underlying land, subject to the following conditions:

(a) The purchaser, at its sole cost and expense, must remove the houses by December 31, 2021;

(b) The state is not responsible for any costs or expenses associated with the sale, removal, or relocation of the buildings from opportunity site six; and

(c) Any sale proceeds must be deposited into the Thurston county capital facilities account.

4.) Greg Griffith, President OHS-BHM Comment

In regard to 13 (d) 2 (a), it is unfortunate that much of the Newhouse Building replacement site will be used to accommodate the automobile. While I laud DES for your care and effort to design a landscape plan "that respects the Olmsted heritage....and prioritizes an enhanced pedestrian experience," it is apparent that the experience that visitors will have upon entering the campus from I-5 will be like driving into a typical suburban office park found in Anywhere, USA.

5.) Greg Griffith, President OHS-BHM Comment

In regard to 13 (d) 2 (b) and (c), with the closing of the Visitors Center and State Capitol Museum, other than the Legislative Building tours, Olympia and Washington state are left without adequate facilities for visitors to receive orientation to the campus and interpretation of state government, the Capitol Campus, and history of Olympia as the capital city. Mitigation for the Newhouse Building replacement and for the Legislative Campus Modernization (LCM) project should include a strategy to address this oversight.

LCM Response

The Newhouse Replacement Project will regrade and improve the landscape buffers around the parking lots to reduce their visual appearance and headlight glare. Currently, much of the parking on the Newhouse site is located on elevated lots near the Press House structures or on lots immediately adjacent to the existing building. The project will drop the elevation of the lots on the Newhouse site and add landscaping between the lots and the street to reduce the potential for headlight glare reaching nearby residences. Parking on the east half of Opportunity Site Six will remain elevated above Capitol Way South and Sid Snyder Avenue SW and have enhanced landscaping around the perimeter that reduces the visual impact to approaching visitors. The reconfigured Visitor Lot will also substantially upgrade the pedestrian walkway that links Columbia Street SW to the pedestrian bridge with landscaping and new lighting. This will enhance the experience for visitors and campus employees who walk to parking or other buildings along that route.

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 an orientation to the campus and interpretation of the State government, the Capitol Campus, and history of Olympia as the capital city. In fact, this building was leased to Experience Olympia and Beyond dba Olympia-Lacey-Tumwater Visitor and Convention Bureau office for Thurston County. These services ended on September 30, 2019, when the tenant chose to close this office. Mitigation for the closure of the building's use as a Visitor Center is not included in the scope of the Newhouse project.

6.) Greg Griffith, President OHS-BHM Comment

In regard to 13 (d) 3 (a)-(c), I strongly support implementation of these mitigation measures related to Social and Cultural History and Context. In regard to the work called for in (a) I recommend also including preparation of a NRHP nomination of at least one eligible and intact example of architect Ayers' projects in Washington.

7.) SCNA Comment

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 alternations to support needed business functions goes against the principles of historic preservation.

8.) SCNA Comment

The demolition and loss of several historic structures, as detailed in the SEPA checklist, is difficult to mitigate. The mitigation in the SEPA checklist includes good actions, including additional efforts to relocate the press houses.

9.) SCNA Comment

We propose two additional mitigation measures. First, we support landscaping reflecting 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

The potential designation of buildings in Elizabeth Ayer's built portfolio but located elsewhere in the region, is outside the scope of Newhouse SEPA process. In conjunction with the Washington State Senate; Department of Archaeology and Historic Preservation; and the Department of Enterprise Services, an extensive survey and report on Elizabeth Ayer's work, including the Hanson/Ayer Duplex was authored by BuildingWork and NW Vernacular. See Comment Response 5 above.

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.

LCM Response

See Historic & Cultural Preservation Comment Responses 2 and 3 above.

LCM Response

Newhouse landscape design and plant selections are discussed in both Plants and Land & Shoreline Use sections in this document. Continued stewardship of the Olmsted landscape plans, as well as extension of said concepts and recommendation, is incorporated both into the Newhouse documents and DES Horticultural operational goals for the future. LCM Landscape Peer Review Panel is reviewing and guiding ongoing discussions and recommendations.

10.) SCNA Comment

Second, the state should provide a visitors center to replace the former visitors center. This function is essential for the many people who visit our state capitol throughout the year.

LCM Response

See Historic & Cultural Preservation Comment Response 5 above. Recommendation of new capital projects is outside the scope of the Newhouse SEPA Checklist.

Transportation – 21 Comments

1.) SCNA Comment

Permanent Closure of Water Street
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

See General Comment Response 1.

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 which functions to reduce vehicle trips and supports making the street system friendlier to all modes of transportation.

LCM Response

Comment noted. The closure of a street owned by State of Washington (Water Street SW between Sid Snyder Avenue SW and 15th Avenue SW) is a security measure that is recommended to limit passage by unauthorized vehicles deep into Capitol Campus. The street would continue to accommodate other modes of local traffic, including pedestrians and bicyclists.

3.) SCNA Comment

A 1994 planning study conducted by City of Olympia led to the development of a modified street grid and planned street connection supporting smaller streets in the place of widening major roads.

LCM Response

Comment noted.

4.) SCMA Comment

Because well-connected streets create more direct routes, fewer miles are driven, saving fuel and reducing pollution. During emergencies and major construction, the grid provides options: if one route is blocked, other direct routes are available. A grid also provides more opportunities to turn left, reducing traffic back-ups. (Connectivity, Chapter 4, Olympia Comprehensive Plan). The street network a well-connected system of small city blocks allowing short direct trips for pedestrians, bicyclists, transit users, motorists, and service vehicles. (Goal 4.1, Olympia Comprehensive Plan).

LCM Response
Comment noted.

5.) 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. It also provides an alternate route for vehicles and emergency responders when Capitol Way is blocked due to protests, demonstrations, parades, or natural disasters.

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

DES will work with the City of Olympia to design how Water Street SW is closed at 15th Avenue SW. Security recommendations are for a "diagonal diverter" on State property north of the intersection. This diverter would allow campus traffic on Sid Snyder Avenue SW to access various parking lots, while allowing local traffic access from Capitol Way South to Water Street SW south of 15th Avenue SW. Final design and location of diverter will accommodate emergency vehicle access north and south of intersection.

Usage of Drop Arms - SCNA

Before the state closes Water Street permanently, we think the following questions and concerns about the use of drop arms, as proposed should be addressed:

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 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. 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 Newhouse SEPA Checklist. 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 of the 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 as part of its review of the overall Capitol Campus parking conditions. Actual mitigation measures implemented will be determined by permits issued for the 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 Newhouse Replacement project. Further, Campus security is outside the scope of Newhouse Replacement project and/or SEPA process, as discussed in Transportation Comment Responses 7 & 8.

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 relates 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 Comment Response 11 above.

13a.) SCNA Comment

The Newhouse Replacement Project will increase impervious surface including size of parking lots 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

The Newhouse project will add parking spaces to combined Opportunity Site Six, increasing from a combined 195 spaces in 2022 to 217 spaces after project completion (net increase of 22 spaces). It is estimated that the Pritchard project will reduce parking stalls between 79 and 87 (depending on site design). Hence the LCM Project - of which the Newhouse project is a piece - will result in a net loss of between 57 to 65 spaces on West Campus. as such, impervious surface on campus will not increase.

13b.) SCNA Comment

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

LCM Response

Newhouse Building Replacement 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).

14.) 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.

LCM Response

Mandates regarding workforce behaviors is outside the scope of the Newhouse SEPA process.

15.) SCNA Comment

The East Campus Parking structure has, at peak times, 83 percent of parking stalls 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. It is ironic the LCM proposes to add 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. Surface parking is the least cost effective way to provide parking.

LCM Response

See Transportation comment response 14. LCM projects will not add parking to the West Campus. The combined Prichard 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. The original LCM-related proviso that established the design parameters for the LCM targeted no net loss of parking. The legislature has amended that to accept that some net loss in parking would occur. Project cost estimates are outside the scope of the SEPA process.

16.) SCNA Comment

We like 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:

- Improve the walkway that connects to the Capitol Way Pedestrian Bridge through the Visitor Parking lot.
- Improve interior lighting and elevator efficiency, including adding wi-fi connection.
- Upgrade pedestrian wayfinding between the Plaza Garage and West Campus, particularly for pedestrians returning to the garage and its many elevator access points.
- Work with City of Olympia to improve signage directing motorists to visitor parking in the Plaza Garage.
- Provide information about Capitol Campus parking as part of event permits, employee on-boarding, 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.
- When demand warrants, re-institute the employee shuttle between the Plaza Garage and the West Campus. We (SCN) would expand the shuttle service to serve others participating in the legislative process when the Legislature is in session.
- Update the following campus-wide parking policies and operating procedures.
 - Change the assignment / reservation of individual parking stalls (necessitated by reduction of LCM parking).

LCM Response

Comment noted. See Air comment responses 1 and 2.

17.) 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 Campuswide Parking Study when Plaza Garage occupancy exceeds 80 percent.

LCM Response

Comment noted. See Air comment responses 1 and 2.

18.) SCNA Comment

We note that these are only recommendations in the Heffron Report. 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

Noted. Mitigation measures made in the Heffron report and SEPA are only recommendations. DES will consider the mitigation measure recommendations proposed. Actual mitigation measures will be mandated by the permits issued for the project.

19.) SCNA Comment

We think that monitoring of the use of the Plaza Garage by employees in the temporary modular building should start as soon as they start working there, especially during the dark, rainy winter months.

LCM Response

Comment noted.

20.) SCNA Comment

Some of the recommendations such as a shuttle may need to be started sooner rather than later

LCM Response

Comprehensive transportation planning is outside the scope of the Newhouse 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 re-establishment of shuttle services as need and funding allow.

21.) SCNA Comment

The Heffron Report estimates that after more employees return to work after pandemic restrictions are eased, about 20 percent of the employees returning to work will continue parttime work from home, equating to one day per week. 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. The strategy that the commute reduction program uses to promote alternative modes of transportation should be detailed to expand success.

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 Newhouse SEPA process.

Public Services – No Comments

No comments submitted for this category.

Utilities – No Comments

No comments submitted for this category.
