



**Legislative Campus Modernization
Pritchard Rehabilitation and Expansion Project
SEPA Environmental Review Public Comments and Responses
Sept. 15, 2023**

Overview

Responses to comments provided in this document address environmental issues raised during the public comment period for the draft Pritchard Rehabilitation and Expansion Project State Environmental Policy Act (SEPA) environmental review. The Department of Enterprise Services (DES) released the draft environmental review for comment on May 26, 2023. The 14-day comment period ended on June 9, 2023. A total of 22 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 environmental review. Some issues raised are outside the scope of a SEPA environmental review, 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 “outside the scope” of the SEPA process.

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General

Comments received from Patrick McDonald, PhD

Issue: Maintaining the character of Thiry's design

Page 4 of the SEPA checklist states: "Rather than remove and replace the building to maintain its use as modern legislative office space, this project proposes the rehabilitation and expansion of the current building to enhance its use and retain its character."

- 1. Comment:** The proposed design not only takes away from Paul Thiry's original design and intent, but it also creates a completely new look to the facility leaving only a bare minimum of the original building and not enough to meet historical design standards outlined in the National Historic Preservation Act of 1966 (Public Law 89-665, 16 USC sec. 470 et seq.) and those guidelines, in conformity with that act. The proposed changes are a radical departure from the look of the building. This building is listed on the National Register of Historic Places (NRHP Reference No. 15000501, certified August 3, 2015), and its radical reimagining would violate the basic tenants of the designation.

LCM Response: The Pritchard project team has been in consultation with the Department of Archaeology and Historic Preservation (DAHP) since the early phases of design, with the goal of minimizing impact to the historic structure. As a property listed on the National Register of Historic Places and funded by state money, the Pritchard Building is subject to WA [Executive Order \(EO\) 21-02](#), which requires consultation with DAHP for alterations to cultural resources. Item 3 of the EO states, "State agencies shall take all reasonable action to avoid, minimize or mitigate adverse effects to archeological and historic archaeological sites, historic buildings/structures, traditional cultural places, sacred sites or other cultural resources."

As noted in the SEPA environmental review, DAHP issued a determination of "no adverse effect." While it is always preferable to keep historic elements, the Secretary of the Interior's Standards for the Treatment of Historic Properties specifically for rehabilitation "acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character."

The original intent of the 'stacks' volume as book storage creates unique challenges for reuse as occupied office space. While the original windowless façade was an acceptable solution for storage, it does not allow for the creation of functional office space and would not allow the occupants of those offices access to daylight or views to the outside. The low floor to ceiling heights of the existing 'stacks' paired with the structural damage suffered during the Nisqually earthquake do not make salvaging that part of the building a reasonable solution.

Issue: Symmetry and Balance of the Campus

Page 4 – "The proposed design maintains the integrity of the Olmsted Plan and preserves the symmetrical/axial/figure-ground relationship of the legislative buildings sited around a shared open space."

- 2. Comment:** This statement could not be further from what is being proposed. The addition places a large structure attached to the Thiry-designed building east of the present structure, dramatically throwing the overall design concept off in that direction. It would be better to build a free-standing building in the parking lot than attempt to dramatically throw the building, and its overall balance, off. It is also not the Olmsted plan that drives the overall balance and symmetry of the campus but the original Wilder and White plan. Olmsted merely laid out the grounds in response to the original design. At the time of the Olmsted design, the state did not own the property the current Pritchard Building and proposed addition stand on. The property line shown in the 1928 Olmsted plan for the Capitol campus is on the north side of 15th Street. That 1928 plan shows a well-balanced capitol with all buildings in unison with each other but constructing a monolithic addition to the east side of the Pritchard will throw the balance off. Using the Olmsted design is an attempt to justify the unjustifiable.

LCM Response: Comment noted. The Pritchard Building site was not part of the original campus plan as stated. This is a good example of how the campus has evolved after the original Olmsted plan. As noted above, it is necessary to maximize that site area to fulfill the programmatic needs of the House of Representatives, Office of the Code Reviser and LEG-TECH.

Issue: Connection to the South Capitol Neighborhood

Page 16: "The visual impact of the three-story Pritchard expansion will be softened with multi-layers (i.e., tall trees, understory, and ground cover) of new landscaping along the transitional zone along 16th Avenue Southwest," and "All planning guidelines for the proposed Pritchard project incorporate visual and textural transition between the Capitol Campus and the residential South Capitol Neighborhood to the south."

- 3. Comment:** There is also an absence of architectural renderings of the proposed addition from the intersection of Sylvester and 16th – particularly within 25 feet south into Sylvester Street, to obtain a true vision of what the new building will look like in relation to the neighborhood and showing how much the capitol will be blocked off from the neighborhood. I and others from the neighborhood have requested this several times but have been ignored by those involved in the project and its planning. This is crucial in demonstrating the massing of the new addition and its impact on the neighborhood immediately south of the proposed project. The addition is a massive structure following the roofline of the Pritchard Building central tower; unless the building is modified to lessen the massing effect, there is little that can be done with landscaping to modify the impact this structure will have on the relationship of the campus to the neighborhood.

LCM Response: Trees planned on the south side of the proposed addition will reach widths and heights that will soften the appearance of the building. We acknowledge that the vegetative buffer will not hide the addition. The goal for the landscape south of the building addition is to

restore the conifer forest that once existed as an integral part of the Olmsted Brothers' 1928 plan. Renderings are developed through the design process **and are outside the scope of the SEPA process.**

Comment received from Joanne Stelson

- 4. Comment:** They do not address how many trees were cut down to pay for this project (DNR). You should reference that somewhere. There were so many complaints about how they got the project funding, and its environmental impact on those forests due to logging. Shame.

LCM Response: The project is funded through general obligation bonds (Fund 057), and will be paid over time through the state's general fund.

Earth

No comments received for this category.

Air

Comment received from the South Capitol Neighborhood Association

- 5. 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 renovated Pritchard 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. But this mitigation is not sufficient. For example, the last session of the Legislature amended the Growth Management Act to require that the City of Olympia's and Thurston County's comprehensive plans "...consider utilizing urban planning approaches that promote physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state" (RCW 36.70A.070 (1)). As the county and the city's largest employer the State's telework and commute trip reduction policies can play an important role in assisting the city and county in achieving this goal.

Therefore, 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 1-5 Corridor, biking, and walking.

Response: Comment noted. Look at responses to 18-20 under "transportation."

- 6. 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 of 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 LCM as a whole will cause an increase of 630 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 five percent of Capitol Campus employees

reported they worked from home. Now, conditions are ripe for wide ranging telework programs. For Pritchard, this is especially true when the Legislature is not in session. Prior to the pandemic 47.6 percent of employees in state executive branch agencies were eligible to telework but only 23.7 percent took advantage of this option. Greatly increased reliance on remote work should be included in the SEPA checklist as another air pollution mitigation measure.

LCM Response: The worst-case trip generation estimates in the Transportation Technical Report (Document 10) provided with the SEPA environmental review, 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 replacement building will house the same number of legislators and staff that are already housed in the previous 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.

Policies to promote alternatives to single occupancy vehicles and campus-wide measures to reduce parking are **outside the scope of the SEPA process for this project**. See response for Comment 6 above.

- 7. 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. The air pollution mitigation measures cited above should also be included in the SEPA checklist.

LCM Response: See response to Comment 6 above. Continued study and implementation of parking strategies are not within the authority of the LCM program **and are outside the scope of the SEPA process**; however, the issue is part of DES Parking Workgroup studies.

- 8. Comment:** Current legislative human resource policies allow for almost full-time telework options during the interim should employees choose to exercise those options. Increased commute trip reduction and multimodal options to the Capitol Campus would be welcomed by the design team but those decisions are made through state laws and administrative policies. The project minimizes additional parking spaces, which encourages the use of alternative modes. Dynamic parking pricing would further discourage additional vehicle trips and that can be addressed through the Department of Enterprise Services and Legislative Security, who manage parking on campus.

LCM Response: Comment noted. However, implementation of these policies is both outside the authority of DES and beyond the scope of the SEPA process for the Pritchard project.

Water

No comments received for this category.

Plants

Comment received from Patrick McDonald, PhD

Removal of Big Leaf Maple – Scope Designation

Page 9: "Although out of scope for the Pritchard project because it does not alter landscape plans, a City of Olympia Landmark designated bigleaf maple tree within the city right-of-way on 16th Avenue will be replaced".

9. **Comment:** It is unclear how such a large tree on the proposed site would be out of scope for this project. It directly affects the appearance and relationship to the site and the neighborhood, and its necessary removal (due to rot) and replacement should be included in this project's scope, especially softening the impact of the monolithic proposed addition to the Pritchard Building.

LCM Response: This is outside the scope of the Pritchard Rehabilitation and Expansion Project. The bigleaf maple tree was determined to be a "hazard tree" per the arborists report (Document 18) included with the SEPA environmental checklist. Its removal is necessary earlier than the planned construction of the Pritchard expansion.

10. **Comment:** Also, no mention is made if the bump out on 16th will be removed, and the Street returned to its historic alignment that existed from 1915 until 2015.

Response: Comment noted.

Animals

No comments received for this category.

Energy and Natural Resources

No comments received for this category.

Environmental Health

Noise

Comment received from South Capitol Neighborhood Association

Comment: Construction noise has already been a problem during the first weeks of the Newhouse Building demolition. For example, early morning demolition recently occurred on a Saturday. As a result, we ask that the "noise monitoring program" suggested in the Noise section of the checklist be implemented without delay, and that every effort be made to minimize after-hours noise. We request further information about the noise monitoring program before it is implemented, such as:

11. How will neighbors be notified of excessive noise that may occur outside of normal operating hours?

LCM Response: While not anticipated, any construction occurring outside of normal operating hours will be posted on the DES LCM Project web page at des.wa.gov and included in the LCM Weekly Update.

12. **Comment:** How should complaints of excessive noise be communicated to the contractor from the neighbors?

LCM Response: Any concerns related to the LCM project should be directed to DES_LCM@des.wa.gov. DES will address any concerns with contractors.

- 13. Comment:** When the Pritchard Building extension is fully occupied, we believe delivery vehicles will be active on the south side of the building. This has the potential to create excessive noise. We ask that the SEPA checklist identify this potential impact and propose mitigation measures such as noise monitoring and reporting.

LCM Response: Noise monitoring is not proposed because deliveries will continue to occur within the hours provided in the City's noise ordinance.

Land and Shoreline Use

No comments received for this category.

Housing

No comments received for this category.

Aesthetics

Comments by South Capitol Neighborhood Association

Comment: We appreciate the challenges inherent in designing the Pritchard extension so as to meet the critical Secretary of Interior's standards. We understand the current proposal for placement and size of the extension is a work in progress and urge further attention to its symmetry and the need for more architectural interest. In that spirit we suggest consideration of the following concepts:

- 14. Enhance connectivity.** We appreciate what a tough challenge it is to distinguish the historic mid-century design of Pritchard and an adjoining new office building that is located adjacent to the neoclassical Capitol Group. We wonder if the addition of an architectural element, such as an atrium or passageway, would accomplish a sense of spatial separation while maintaining a complementary relationship with the architectural styles of the surrounding structures.

LCM Response: The functional program and security needs do not allow for the creation of a gap or physical separation that would allow the public to move through at the connection between the existing Pritchard and the proposed addition. Separating the existing from the addition would require the introduction of additional vertical circulation, public circulation and security stations that would decrease available floor area for required program function.

- 15. Reconfigure windows.** Using vertical windows on the north and south sides of the stacks replacement structure and returning to the original window design on the ground level of the existing Pritchard building appear to achieve an effective transformation. The windows depicted for the east end of the extension and west ends of the stacks extension may be conceived to mirror those on the ground floor of Pritchard; however they seem to lack relationship with the west end of the building as well as with the north/south sides of the building.

LCM Response: Comment noted.

16. Clarify impacts of service entrance. The location and use of the service entrance is of great concern to the neighborhood. Noise, traffic and appearance of the entry must be addressed with the needs of the neighborhood in mind. This would include an analysis of the types and hours of deliveries, the surrounding buildings being served, and the access route to the point of delivery, as well as the types of screening and landscape planned at the site.

LCM Response: The intent is that this area is a solid enclosure with the same cladding material as the rest of the addition with a rolling gate in front that would be used as a trash collection area and a loading area for deliveries.

Light and Glare

Comments received from South Capitol Neighborhood Association

17. Comment: We appreciate the offer to review the lighting designs for the Pritchard building as part of the proposed mitigation. We will work with DES to review the designs. However, please note that the SCNA is not qualified to determine if a particular lighting design will or won't meet the goals of minimizing glare or extraneous lighting. We ask that DES provide the relevant expertise during the design phase of the project for this purpose to provide such assurance.

LCM Response: The project team for the Pritchard Rehabilitation and Expansion project will share documents and collect SCNA comments as part of the Construction Document (CD) submittal process and resulting building permit process. The design team's priorities and LEED study focus on maintaining site safety and aesthetics while avoiding impacts to 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. As 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

No comments received for this category.

Transportation

Comment received from Patrick McDonald, PhD

Issue: Permanent closure of 15th Street SW at Water

Page 4: "Improvements are proposed at the intersection of Water Street Southwest and 15th Avenue Southwest. The proposed treatment includes a diagonal diverter across this intersection from the southwest corner to the northeast corner," and page 22: "The Pritchard Building project will implement permanent closure at the Water Street Southwest / 15th Avenue Southwest intersection with a diagonal

diverter. This feature is envisioned as a raised median-style barrier connecting the southwest corner of the intersection to the northeast corner. Local neighborhood traffic could continue to use Water Street Southwest south of the intersection, as well as 15th Avenue Southwest east of the intersection".

18. Comment: Permanent closure of this intersection will have a major impact on traffic flow through the neighborhood and should have a more specific and deeper analysis, especially on its impact on the neighborhood. It is understood that the need for heightened security during the legislative session warrants control of traffic on the state-owned section of Water Street. However, leaving it closed off during the interim between legislative sessions should be reconsidered and not made permanent. Parking and access areas around the capitol are left open during the interim, especially to the south of the Legislative Building; this would set an unfortunate precedence and, along with the new addition to the Pritchard building, contribute to the walled-off appearance of the historic neighborhood to the capitol campus.

LCM Response: Comment noted. The portion of Water Street Southwest 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.

Comments received by South Capitol Neighborhood Association

19. Comment: The SCNA continues to be concerned about the proposed permanent closure of Water Street. Specifically, the Pritchard Building SEPA Checklist proposes to construct a raised diagonal diverter across the intersection of Water St and 15th Avenue SE. This diverter would permanently prohibit vehicle traffic on Water Street SW between Sid Snyder Avenue and 15th Avenue SW. Instead, we feel strongly that barriers that can be controlled, such as removable or retractable bollards similar to those at the entrance to Governor's Mansion, better support the State's and the City's goals. The solution of retractable bollards was suggested by the project team at a recent LCM stakeholder meeting. In other iterations of the LCM planning "drop arms" were proposed as a barrier but we strongly oppose these. Drop arms conflict with the aesthetics of the campus and provide limited security; additionally, drop arms are unnecessarily confusing and unwelcoming to those visiting the Campus.

LCM Response: Comment noted, see previous response to comment 18. With regards to the use of drop arms, the current design concept would create the diagonal diverter using removable posts rather than a permanent median feature.

20. Comment: 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.

A 1994 planning study conducted by the 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.

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. (See "Connectivity", Chapter 4, Olympia Comprehensive Plan)

The street network is a well-connected system of small city blocks allowing short direct trips for pedestrians, bicyclists, transit users, motorists, and vehicles. (See "Goal 4.1", Olympia Comprehensive Plan).

LCM Response: Noted. See previous response to Comment 18. The closure will not have an environmental impact.

- 21. 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.

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

The proposed street configuration allows emergency vehicle access to the Pritchard, Cherberg and O'Brien buildings, and DES has reviewed access diagrams and completed a turning movement analysis for a fire truck with City of Olympia staff.

Emergency access to the South Capitol Neighborhood would be retained via 15th Avenue Southwest and Water Street SW.

As noted in response to Comment 19, the current design concept would create the diagonal diverter using removable posts rather than a permanent median feature to allow emergency vehicle access if other routes are blocked.

- 22. Comment:** Finally, the 2006 Master Plan for the Capitol of the State of Washington supports the maintenance of the existing street grid, including Water Street between Sid Snyder Way and 15th Avenue Southeast. See:

- Principle 3.1 which 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."
- Principle 1 which relates to Public Use and Access and states as a goal "...that security measures that are as seamless and transparent as possible."

Consistent with the Master Plan, the State's support of Principle 3.1 of the Master Plan is fully considered in the scope of the entire LCM Project, including the Pritchard project. The vitality of the City of Olympia and the South Sound region benefit by 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.

Finally, we include by reference our comments on Section 2 "Air" here regarding additional mitigations we believe are necessary to reduce the impact of added traffic on the transportation network.

LCM Response: The air pollution mitigation measures included in the comment are outside the scope of the Pritchard project. However, DES has prioritized an internal review and a capital project funding request for a formal parking study and future strategies. Currently, the 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, and 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.

Public Services

No comments received for this category.

Utilities

No comments received for this category.