ADDENDUM TO EXISTING ENVIRONMENTAL DOCUMENT
(MITIGATED DETERMINATION OF NONSIGNIFICANCE)

BETHEL SCHOOL DISTRICT NO. 403
NEW BETHEL HIGH SCHOOL PROJECT

Description of Proposal (also "Project"):

In February of 2019, the voters of Bethel School District overwhelming approved a Capital Bond, to include among other projects, the construction of New Bethel High School to replace the existing Bethel High School in a location (7718 224th Street East, Graham, Washington) that supports the student body and the community as recommended by the District's Long Range Facilities Task Force. The existing Bethel High School site is not functionally adequate and cannot accommodate the needs of its students and as such, Bethel School District Bond Resolutions and Board Resolutions identified the site for the new high school as District-owned property located near the intersection of 77th Avenue East and 224th Street East in the Graham area of unincorporated Pierce County.

The proposed New Bethel High School consists of a 281,723-square foot, two-story high school that would house approximately 1,800 students upon occupancy with capacity for four future portables for an additional 200 students and up to 145 staff and one future portable for a student-based health clinic. The Project includes traditional athletic high school facilities with six tennis courts, a baseball field with synthetic turf installed to the baseline, a softball field with synthetic turf installed to the baseline, and a synthetic track with a synthetic turf, lighted Multi-Purpose Field, and an adjacent grass practice field with use for discus and javelin. Primary access to the New Bethel High School would be from the intersection of 77th Avenue East and 224th Street East where a new traffic signal would be installed with public right-of-way improvements as a component of the project. This access serves as the primary access for students, staff and visitor parking along with the student drop-off/pick-up loop. An access driveway from 70th Avenue East to the School Site with public right-of-way improvements is planned as a restricted access for school buses only and will service only the bus drop off area. On-site parking would be provided in three separate lots with a total of 478 parking stalls.

Project Proponent:

Bethel School District No. 403 ("District")
5410 184th Street East, Building C
Puyallup, WA 98375

Project Location:

The proposed New Bethel High School consists of four parcels located southerly and southeasterly and southwesterly of the 77th Avenue East and 224th Street East intersection in the Graham area of unincorporated Pierce County. Signage for the new High School will be located at the northeast corner of 224th Street East and 77th Avenue East.

(Parcel Nos. 0418172009, 0418172010, 0418172019, and 0418172021; signage will be located on Parcel No. 0418172022)

Lead Agency: Bethel School District No. 403

Title of Document being Modified: Mitigated Determination of Nonsignificance

Date of Document being Modified: September 22, 2023

Description of Document being Modified: A public comment on the Environmental Checklist by Mr. George Wearn, dated July 21, 2023, was apparently electronically submitted to the District. However, Mr. Wearn's comment was not delivered and transmitted to the District's email server and was only discovered shortly before October 11, 2023, as an attachment to a Pierce County Staff Report. Therefore, Mr. Wearn's comment nor a response thereto was included in the Mitigated Determination of Nonsignificance (MDNS) that was issued on September 22, 2023. The purpose of this Addendum to the MDNS is to address the comment letter received from Mr. Wearn. The following provides a summary of the comments from Mr. Wearn and responses to comments based on the reports, studies, memoranda, and plans that are on file with the District and that have been prepared for the project.

- Comment: A full environmental impact statement should be prepared because of significant impacts to the environment, including conversion of a cow pasture to educational facilities; use of PA systems and noise; traffic; and, stormwater runoff from parking.

  Response: A detailed and comprehensive environmental review was conducted as part of the SEPA Checklist for the project including an analysis of site plans and associated project drawings, evaluations of required development engineering, health, and land use regulatory submittals, land use with associated permissible use categories and resource classifications, cultural resources, noise, lighting, transportation (traffic and parking), air quality, hydrogeology, earthwork, wetlands, wildlife, and water resources/stormwater. Technical analysis were also prepared to support the SEPA Checklist, including: Geotechnical Engineering Report (Migizi Group, 2021), Air Quality Screening-Level Analysis (Landau Associates, 2023), Wetland Analysis Report and Mitigation Plan (Raedeke Associates, 2023), Hydrogeologic Assessment (Aspect Consulting, 2023), Wildlife Habitat Assessment (Raedeke Associates, 2023), Noise Study (Landau Associates, 2023), Lighting Report (Stantec, 2023), Archaeological Resources Inventory (Historical Research Associates, 2023), Transportation Technical Report (Heffron Transportation, 2023), Western Wetlands Inflow Volume Analysis (Clear Creek Solutions, 2023), Wetland Z Inflow Volume Analysis (Clear Creek Solutions, 2023), Storm Facility Systems Technical Memorandum (Sitts & Hill, 2023), and Stormwater Drainage Report (Sitts & Hill, 2023); proposed on-site sanitary sewer system plans, Richard Wilkerson & Associates documentation, and Tacoma-Pierce County Health Department review and approval. The SEPA Checklist was properly published, posted, and noticed. Mitigating conditions were incorporated as part of the project and no significant adverse impacts were identified.

- Comment: Concerns regarding the proposed septic system and associated Tacoma Pierce County Health approvals. Wastewater volumes for the New Bethel High School are underestimated at 3,500 gallons per day (1.9 gallons per student) while the Department of Health uses a figure of 16 gallons per student for a large onsite sewage system (LOSS) (approximately 28,000 gallons per day

for the proposed student capacity). Such a volume of flow could overwhelm the system and contaminate Wetland Z.

Response: The septic system designed by Richard Wilkerson & Associates is not a LOSS system. The design includes six sand-lined pressure bed drainfield systems. Filtration is achieved through distribution of wastewater influent to the sand strata over the filter media in controlled, uniform doses through utilization of pump chambers operated on a timed schedule. The replacement school is designed for 1800 students, 200 future students and 145 staff (2145 total) student and staffing level with a reserve factor for future growth. Wastewater design flows were calculated using data from the five on-site wastewater systems serving the Graham Kapowsin High School (GKHS) Campus. The GKHS is a Bethel high school similar in size and scope as the existing and proposed New Bethel High School. Sewage system control panel data from the five GKHS on-site septic systems were read and recorded multiple times over a three year period to document accurate sewage flows. Measurements taken with school in session indicate an average combined sewage flow of 10,814 gallons per day being processed through the five on-site septic systems. Extrapolated data shows that daily flows for the existing 239 staff and 1818 students may be conservatively estimated to be 5.26 gallons per person per day (10,814 divided by 2057). Each of the five GKHS septic systems was designed, approved and installed for a maximum daily flow of 3500 gallons per day, 17,500 gallons per day combined. Current average flows are at 61.8 percent of the combined design capacity. A reduction in drainfield sizing was taken for the GKHS based on the five day school week and sewage system time dosing over a 7 day period. No such reduction is proposed for the New Bethel High School; therefore, the combined systems have an additional reserve capacity of 41,992 gallons per week for peak flows.

Based on the GKHS flow study, the New Bethel High School is designed at 6.26 gallons per student and staff member per day including an 8.4% safety factor. The new school has restrooms, wet classrooms, locker rooms and a warming kitchen distributed across the building. Working with the mechanical engineer for the Project, Wilkerson Associates was able to collect wastewater from within the building and divert flows into individual systems that will not exceed 3499.34 gallons per day based on population centers, plumbing fixtures and classroom orientation. Each of the six New Bethel High School 3499.34 gallon per day systems is designed for 559 students/staff per day. The proposed combined flows for all six systems is 20,996 gallons per day capable of serving 3354 students/staff at 6.26 gallons per day each. The combined flow of 20,996 gallons divided by the proposed students/future students/staff of 2145 equates to 9.79 gallons per person per day, a reserve capacity of 156 percent over 6.26 gallons.

The on-site septic system, as designed, has been reviewed and approved for Critical Area Compliance in accordance with the regulations of the Tacoma-Pierce County Health Department (TPCHD) and Pierce County. TPCHD has approved the New Bethel High School on-site sanitary sewer system design, including its location, subject only to final signature on a water availability letter to be issued by Washington Water Service, the water purveyor; a preliminary water availability letter having been issued previously by Washington Water Service.

As documented in the Hydrogeologic Assessment prepared by Aspect Consulting (Aspect), drilling logs for the wells within the area of septic drainfield, indicate that subsurface conditions were consistently observed as being primarily composed of sand and gravel between the proposed drainfield area and Wetland Z. These soil characteristics are highly permeable as confirmed by the Hydrogeologic Assessment. In addition, the soil logs, completed by the Migizi Group, as set forth

under its Geotechnical Engineering Report, also documented the underlying area of the proposed septic system drainfield consists of highly permeable gravel soils with high infiltration rates. Data presented by groundwater monitoring evaluated by Aspect established that the wet season depth to water in the drainfield area ranges from about 10 feet to 30 feet below ground surface as measured in the site monitoring wells within the drainfield area. Aspect concluded that no low permeability sediments were identified from ground surface to below the water table that would result in "perching" or "daylighting" of water discharged, including within the area of from the septic drainfield. Therefore, wastewater would not likely surface flow.

As documented in the Clear Creek Solution Wetland Z Volume Analysis, the drainfield system is located within Groundwater Zone 3 which discharges groundwater to Wetland Z from the months of January through March. The directional groundwater gradient shifts north seasonally as established under the Aspect Hydrogeologic Assessment. Therefore, the net discharge of water (including effluent) on the site heads north away from Wetland Z most of the year.

The southerly extent of the on-site sanitary sewer system is 740 feet from Wetland Z. The location exceeds the minimum requirements of the Tacoma-Pierce County Health Department Environmental Health Code Chapter 2, Table 4 (consistent with the Washington State Department of Health separation requirements (WAC 246-272A-0210), which requires a minimum of 100 feet of distance between a drainfield and a water body (measured from the ordinary high water mark), a surface water component, or a drinking well. A minimum separation of 200 feet is required for public drinking from a spring. The reserve area is located north of the primary drainfield area and totally outside of the groundwater discharge area flowing to Wetland Z.

The design of the septic system includes a denitrification system which provides decomposition of wastewater constituents by bringing the wastewater into contact with a developed biological community attached to the surfaces of the filter media which is shown graphically and described on the design plans submitted to TPCHD. The Technical Memorandum, dated September 5, 2023 (accompanying the MDNS) and the Wetland Assessment and Mitigation Report (submitted as part of the SEPA Checklist) prepared by Raedeke Associates evaluated water quality to protect wetland functions, inclusive of Wetland Z. The Raedeke Associates Wetland Assessment Report and Technical Memorandum documented that Best Available Science review by the Washington State Department of Ecology which included analysis of impacts from pollutants and nutrients (inclusive of nitrogen and phosphorous) supports a 225-foot buffer provided for Wetland Z which exceeds the minimum buffers recommended by Best Available Science to provide water quality treatment and protection. As discussed further in the Raedeke Technical Memorandum, the 225-foot buffer width provided to Wetland Z exceeds the standard 150-foot buffer required by Pierce County Code for fish-bearing streams and is consistent with Washington Department of Fish and Wildlife riparian zone management width recommendations for protection of riparian functions and salmonids. Pierce County, through its Senior Wetland Biologist, determined that a 225-foot buffer was adequate to protect Wetland Z which is a portion of the Muck Creek system.

Clear Creek Solutions considered the additional effluent in its Wetland Z hydroperiod stormwater analysis. As established under the Wetland Z Volume Analysis prepared by Clear Creek Solutions as set forth under Table 4 therein, the volume of water discharging to Wetland Z from the project is substantially greater than the volume of effluent based upon the design volume of the collective six septic systems.

- Comment: Reduction of the Wetland Z buffer from 300 feet to 225 feet.

  Response: The reduction of the Wetland Z buffer was addressed under the SEPA Checklist, the Wetland Assessment and Mitigation Report prepared by Raedeke Associates, and the Mitigated Determination of Nonsignificance with associated Technical Memorandum, dated September 5, 2023, prepared by Raedeke Associates.

- Comment: The presence of agricultural soils that are noted on USDA Natural Resources Conservation Service soil maps.

  Response: As noted in the SEPA Checklist, a Geotechnical Engineering Report was completed for the project (Migizi Group, 2021) which included a review of existing soils maps and completion of 24 soil exploration test pits to confirm the actual soil conditions on the site. It is also acknowledged in the Land Use section of the Checklist that portions of the grass areas on the site have been periodically and infrequently used as space for horses and cows. However, the site is not designated by Pierce County as agricultural or forest land of long-term commercial significance. The site has been designated as Rural Residential-10 which allows educational uses, including high schools with a Conditional Use Permit (PCC ch. 18A.43).

- Comment: The 2.6-acre conifer stand is in fact smaller than stated in the Checklist.

  Response: The comment is noted. The SEPA Checklist provided an approximate measurement of the size of the retained conifer trees in the northeast corner of the site. It has been discovered that there was an inadvertent computational error and the conifer stand is approximately .9 acres. However, this computational error does not alter the size (approximately 57 acres) of open space areas incorporated as part of the Project, which includes wetlands and Critical Areas Tracts which exceed regulatory requirements, vegetated areas, and landscaping trees and shrubs (excludes smaller segregated landscaped ornamental areas), all of which will be retained on the site. The conifer tree stand was not included in the calculation of the landscape regulatory requirements. In addition, the tree unit count under the landscape plan substantially (278 trees) exceeds regulatory requirements. The SEPA Checklist and MDNS identify measures and mitigation conditions for plants/trees. New planted landscape areas would be provided as part of the project within perimeter buffers areas and parking lot islands. Additional plantings would be provided in the plaza and courtyard spaces around the proposed building. The planting palette would consist of a mixture of evergreen and deciduous shrubs and trees. Vegetation on the outlying portions of the site would consist of a mixture of new and retained natural grass.

The Bethel School District has determined that this Addendum does not require modification to the Mitigating Conditions identified in the MDNS and probable significant unavoidable adverse impacts would not be anticipated. Therefore, the MDNS will be retained and an environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed Expanded Environmental Checklist submitted by the District, engineering reports, studies, evaluations, memoranda, and plans, the MDNS, public comments, and other information on file with the District. This information is available to the public on request. There is no comment period on the Addendum to the MDNS under WAC 197-11-625.

Responsible Official:	Sara Coccia, Director of Construction and Planning Responsible Official
Position/Title	Bethel School District No. 403 5410 184th Street East, Building C Puyallup, WA 98375 scoccia@bethelsd.org
Contact Designee:	Jeffrey Mann, Facilities Planner Bethel School District No. 403 5410 184th Street East, Building C Puyallup, WA 98375 253-800-6776 jemann@bethelsd.org

Name of Agency adopting document: Bethel School District No. 403

BETHEL SCHOOL DISTRICT NO. 403

By: _____

Sara Coccia
Director of Construction and Planning
Responsible Official

Dated: November 8, 2023