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December 8, 2008

ATTN: Matoya Scott,
Port of Tacoma,
PO Box 1837,
Tacoma, WA 98401-1837

Re: Blair Hylebos Redevelopment Project Draft Environmental Impact Statement

I'm writing in regards to the draft environmental impact statement (DEIS) for the Blair Hylebos Redevelopment Project. The Friends of the Hylebos is a tax-exempt non-profit conservation organization whose mission is to protect and restore the West Hylebos Wetlands and the greater Hylebos Creek Watershed.

Our Hylebos Creek Conservation Initiative is the framework for achieving that mission. This program seeks to preserve and restore over 745 acres of stream, wetland and forest habitat from the West Hylebos Wetlands to the mouth of Hylebos Creek, creating an interconnected corridor of functioning habitat and green space. Because of its location relative to the watershed, the Port of Tacoma and its development (including mitigation efforts) are of particular interest to the Friends. We believe that the Port can play an important role in restoring the ecology of the Hylebos Watershed and Commencement Bay if its development and mitigation efforts incorporate ecological concerns such as the Hylebos Creek Conservation Initiative.

I have reviewed the DEIS primarily for the proposed mitigation projects, and have not focused on the development aspects of the DEIS. That being said, the Friends recognizes the economic importance of the Blair Hylebos Redevelopment Project for the jobs that it will generate for the local economy. Additionally, it appears that the project presents important opportunities to correct outdated stormwater management along the Blair Peninsula.

Mitigation Projects

The Friends of the Hylebos supports the proposed mitigation concepts proposed in the DEIS. We believe the mitigation projects present rare opportunities to restore key ecological niches that have long ago been destroyed in the Commencement Bay ecosystem.



It is evident from the DEIS, that the Port of Tacoma has made a genuine effort to propose mitigation sites that provide high value ecological functions and link up with overarching conservation plans, such as the Hylebos Creek Conservation Initiative and Commencement Bay restoration efforts. Port staff have also made sincere efforts to communicate with stakeholder groups in developing these concepts. The Friends applauds the Port of Tacoma's efforts and believes the proposed mitigation projects will significantly benefit the Hylebos Creek Conservation Initiative, helping us in our goal to preserve and restore key functions of the Hylebos Watershed.

Hylebos/Parsons Restoration

The bulk of the Hylebos/Parson's project is being built as a Natural Resources Damages project, while 1.02 acres will be connected to the Blair/Hylebos Redevelopment Project. The Friends strongly supports the Hylebos/Parsons Project and has had an ongoing role in developing the conceptual project. We are particularly excited about the value of the restoration at this key location, at the mouth of the creek, and the goal of restoring lost habitat niches, such as shallow Intertidal Marsh and off-channel habitat. It makes good sense to use this site to obtain additional mitigation credits, thus enlarging the ecological lift at the site.

I encourage the Port of Tacoma to conduct all mitigation concurrently, if feasible, to minimize construction disturbance. It appears that between the two mitigation efforts, there will remain potential ecological lift at the Hylebos/Parsons site. I encourage the Port to work with local stakeholders to explore potential partnerships that would maximize the restoration of this important site.

Parcel 14 (Wapato Creek)

This site appears to present an excellent opportunity to restore a relatively large area of freshwater wetlands and stream habitat. We encourage the Port of Tacoma to emphasize in the design restoration of natural floodplain functions and emphasize the use of large woody debris in stream and wetland habitat. The Friends recommends its West Milton Nature Preserve as one model for stream & wetland habitat restoration.

Early/Saltchuck Marsh

Both projects present fabulous opportunities to restore large areas of intertidal/shallow marsh habitat that will benefit juvenile and adult salmon from the Hylebos.

The DEIS discusses phased construction of the Saltchuck Marsh project. I encourage the Port of Tacoma to conduct all mitigation concurrently, if feasible, to minimize construction disturbance.

Site Monitoring & Maintenance

Adequate monitoring and maintenance will be critical to the long-term success of each mitigation project. The Friends recommends that each mitigation project include 10 years or more for monitoring and maintenance. Developing an adequate vegetation management plan will also be key, as invasive species will pose a long-term threat to any native plants. In our experience with restoration projects, invasive plant regrowth peaks during the 3rd and 6th years after planting. Up to 10 years of invasive management may be necessary to achieve native plant establishment goals.

In closing, the Friends of the Hylebos supports Blair/Hylebos Redevelopment Project and the mitigation concepts contained therein. We encourage the Port of Tacoma to continue working with local stakeholders, including the Friends of the Hylebos, in refining the designs of the mitigation projects and in the construction and stewardship stages. This will present opportunities to improve the projects and develop community investment in the long-term stewardship of these sites.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Chris A. Carrel".

Chris Carrel
Executive Director