

RECEIVED

By K. Witherspoon at 12:59 pm, Aug 10, 2026

Albert Foster
4088 Cooks Hill Road
Centralia, WA 98531

August 10, 2026

Karen Witherspoon, AICP, Senior Project Planner
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, WA 98532

RE: Comments on SEPA Determination of Nonsignificance (DNS) — File Numbers SEP26-0017 & LLS26-0001; Large Lot Division at 149 Mattson Road, Centralia (Parcel 023883000000)

Dear Ms. Witherspoon:

I am writing to submit comments on the Determination of Nonsignificance (DNS) for the above-referenced division proposal at 149 Mattson Road. Living across the street from the parcel, I have direct experience with the well on our property being low producing and struggling during the dry times of year. Based on that experience I do not believe the DNS is adequately supported, and I respectfully request that Lewis County revisit the DNS determination and require additional environmental review.

My concerns are set out below:

1. The area has limited groundwater availability

In addition to the challenges our well has had, a neighbor's well has at times been so low producing they have had to bring in water. The Department of Ecology WRIA 22/23 Watershed Plan Addendum identifies the Lincoln Creek upland area as an area of known limited groundwater availability. Eagle Creek runs directly through the parcel and joins Lincoln Creek shortly upstream of the parcel boundary. Lincoln Creek and Hanaford Creek are both seasonally closed to further consumptive appropriation. This context is directly relevant to whether six new withdrawals can properly be found to have no probable significant adverse impact and supports requiring a cumulative aquifer analysis and an aggregated project withdrawal review.

2. Flooding, water quality and steep slope risks

The Lewis County GIS system shows the parcel is almost entirely in the FEMA 100-year flood area (Zone A). Eagle Creek floods the parcel regularly and the parcel looks highly likely to be impacted by future flooding. This raises concerns about the performance of six septic systems, the risks to groundwater quality and impacts to neighboring properties including potentially increasing flood risks. Additionally, a good portion of the property not in the Flood zone is identified as a steep slope/erosion hazard critical area. The multiple critical areas impacting this property I believe warrant additional review.

3. Cumulative rural impacts

This parcel straddles the boundary of the RDD-5 and RDD-20 zoning areas. The cumulative impact of the proposal to the area's rural character, including traffic and nighttime skies impacts, I believe, should be further considered.

For the reasons above, I respectfully request that Lewis County withdraw the Determination of Nonsignificance and pursue additional environmental review including potential dry-season pump testing and an aggregate consideration of the water availability and rural impacts, before any project approval.

Thank you for considering these comments. Please include this letter in the official record for this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Foster', with a long horizontal flourish extending to the right.

Albert Foster

4088 Cooks Hill Road, Centralia, WA 98531

206.910.7394

cc:

Mindy Brooks, Director, Lewis County Community Development

RECEIVED

By K. Witherspoon at 1:09 pm, Aug 10, 2026

Karen Witherspoon, AICP, Senior Project Planner
Lewis County Community Development
125 NW Chehalis
Chehalis, WA 98532

RE: File numbers SEP26-0017 & LLS26=0001

August 10, 2026

Dear Karen Witherspoon and the Lewis County Community Develop Department,

We are writing to comment on the above applications to divide a 30 gross acre parcel into six parcels of 5 acres each on Cooks Hill Rd and Mattson Rd.

First, we want to thank you for seeking the surrounding property owner's input. Our property shares a property line with several of the proposed parcels. Our comments/concerns are as follows:

*Water availability for six new wells. Our property was built in 2016. We purchased the property in 2020. From the time our home was built to the time we purchased the property, the recovery rate of our well had diminished. During the summer months, our water holding tanks never reached full capacity. We have since resolved this issue by completing a second well that was drilled prior to our purchase. Our concern is that six new wells within a small radius could once again cause water supply issues for existing properties within the area.

*Flood plain and septic safety. The Lewis County GIS map shows that the 2 properties on Cooks Hill Rd are almost completely within a flood zone. We have witnessed the proposed properties flood at least once every winter since we have lived here. The soil becomes so saturated that large portions of the property pond most of the rainy season. How can a septic system be installed safely upon a flood plain? Would this not be a potential hazard to Eagle Creek which runs through these properties, and possibly Lincoln Creek as well since Eagle Creek feeds Lincoln Creek? From the proposed documents, well locations have been determined, but no information has been provided regarding installation of septic systems on properties which flood and have potential environmental impacts for 2 natural waterways. We request further documentation and investigation into this matter.

*Building within a flood plain. As stated above, some of the proposed properties flood during the winter months. The properties on Mattson have only been used for cattle since we have lived here. The properties on Cooks Hill Rd have remained dormant since we moved here, absolutely no activity at all. These properties on Cooks Hill Rd, from

observation, do not appear to be buildable or if so, only at additional costs. How can residential permits be acquired for properties within a flood plain?

We request answers to questions posed in this letter as well as additional investigation and determinations on environmental safety and impacts to surrounding properties and waterways before approving these applications.

Thank you for your consideration regarding our concerns.

Sincerely,

Michael Stanley and Colette Roberts
4057 Cooks Hill Rd

Karen Witherspoon, AICP, Senior Project Planner
Lewis County Community Development
125 NW Chehalis
Chehalis, WA 98532



RE: File numbers SEP26-0017 & LLS26=0001

August 10, 2026

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First, we want to thank you for seeking the surrounding property owner's input. Our property shares a property line with several of the proposed parcels. Our comments/concerns are as follows:

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Thank you for your consideration regarding our concerns.

Sincerely,

Michael Stanley and Colette Roberts
4057 Cooks Hill Rd



Ms. Colette Roberts
4057 Cooks Hill Rd.
Centralia, WA 98531-9082

SEATTLE WA 980

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Karen Witherspoon
Lewis County Community Development
125 NW Chehalis
Chehalis, WA 98532

98532-201025



August 6, 2026

RECEIVED

By K. Witherspoon at 10:13 am, Aug 11, 2026

Dear Mindy Brooks, Director of Lewis County Community Development

RE: File Number SEP26-0017 & LLS26-0001 149 Mattson Road Centralia, WA

I am writing to submit comments regarding the Determination of Nonsignificance (NNS) for the proposed six-log subdivision at 149 Mattson Road.

Based on my personal knowledge of this area, I do not believe the environmental impacts have been fully evaluated, and I respectfully request that Lewis County reconsider the DNS and require additional environmental review.

1. Ground Water Availability

Groundwater availability is a significant concern in this area. I personally know of an adjacent property with wells that have low water production. During the summer months they are required to conserve water, otherwise they face the reality of having to haul in water because the well cannot produce an adequate supply. Given these known groundwater limitations, I question whether adding six additional residential wells can be found to have no probable significant environmental impact without a more comprehensive hydrogeologic analysis.

2. Wet Soils and Drainage

This property contains areas that remain wet for significant portions of the year. In addition, a large portion of the property is identified on the Lewis County flood hazard maps as being within the Eagle Creek floodplain. Eagle Creek regularly floods portions of this property, demonstrating that the site experiences recurring flood conditions rather than isolated seasonal wetness. These conditions raise concerns about groundwater, drainage and the long-term performance of six individual septic systems. I believe additional evaluation should be required to ensure the proposed development will not adversely affect groundwater quality, neighboring properties, or nearby wetlands, or increase flood-related risks to future residents.

3. Cumulative Rural Impacts

The proposal would increase residential density by dividing one 30-acre parcel into six separate home sites. This will increase groundwater withdrawals, septic system loading, traffic, and other impacts in a rural area. I do not believe these cumulative impacts have been adequately evaluated.

4. Request for Additional Review

Based on the known groundwater limitations in the immediate area, the property's location within the Eagle creek floodplain, and the wet conditions present on the property, I do not believe the conclusion that this proposal will have "no probable significant adverse environmental impact" is adequately supported. The combination of known low-producing wells, documented flooding, and extensive floodplain areas warrants additional environmental review and technical analysis before this proposal is approved. I respectfully request that Lewis County withdraw the Determination of Nonsignificance and require additional environmental review and technical analysis before approving this project.

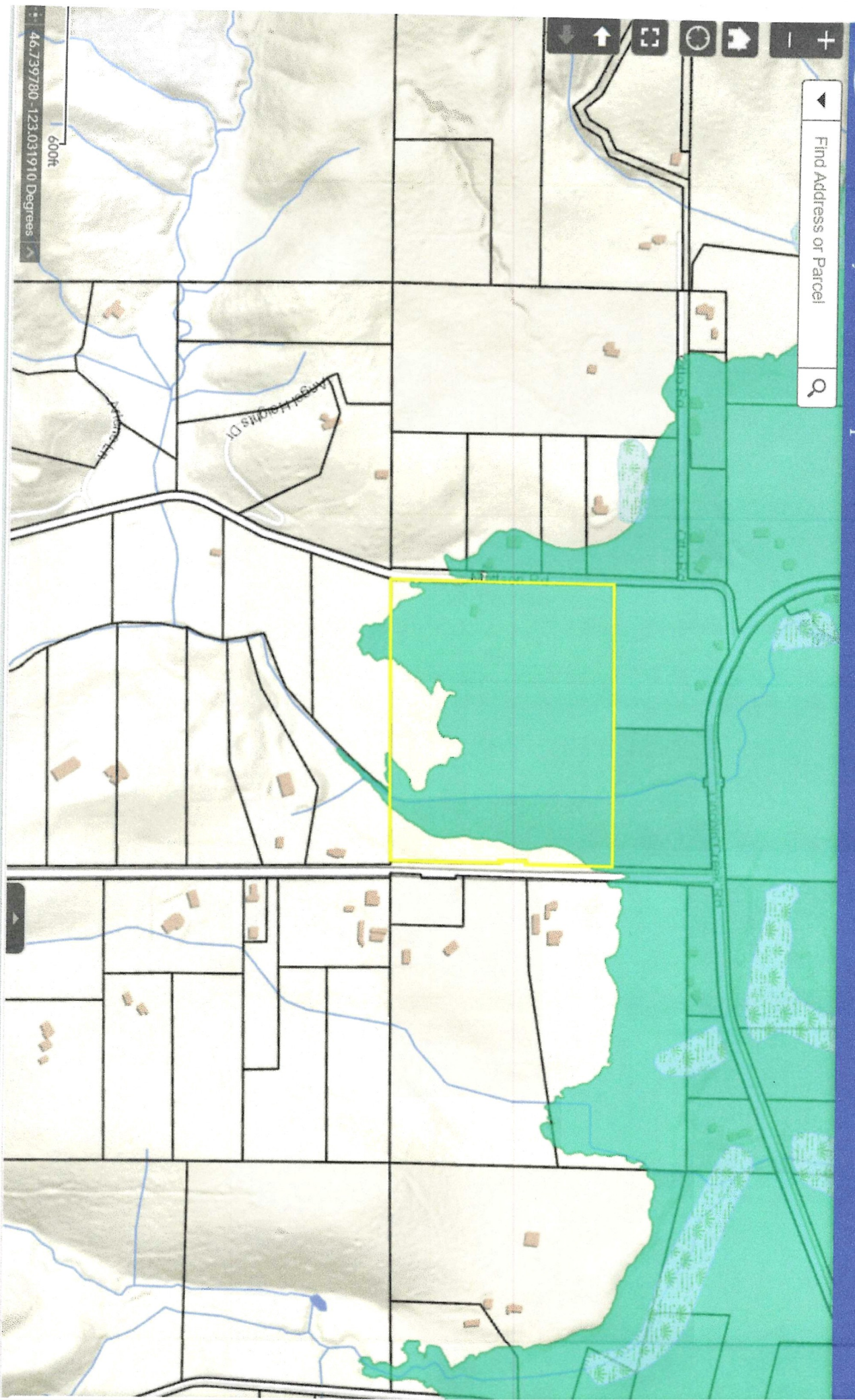
Thank you for your consideration. Please include these comments in the official record for this application.

Sincerely,

Handwritten signatures of Duane and Terri Lantau. The signature for Duane is on the left, and the signature for Terri is on the right, connected by a horizontal line.

Duane and Terri Lantau

Find Address or Parcel





Find Address or Parcel



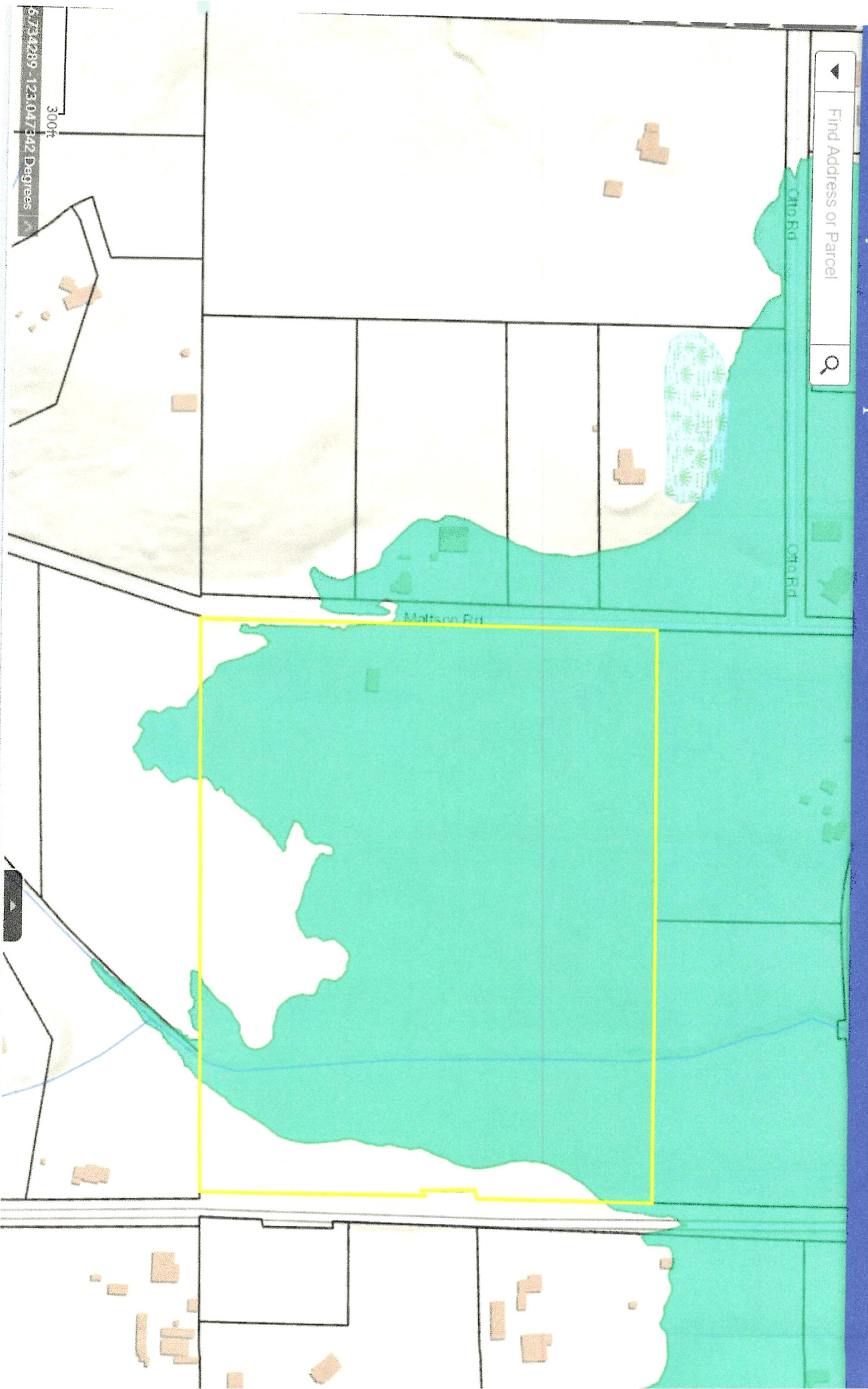
Ohio Rd

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**LEWIS COUNTY – STATE ENVIRONMENTAL POLICY ACT
THRESHOLD DETERMINATION
DETERMINATION OF NONSIGNIFICANCE (DNS)**

LEAD AGENCY: Lewis County – Community Development Department

PROPONENT: TCI Group, LLC (tcigrouppllc23@gmail.com)

FILE NUMBERS: SEP26-0017 & LLS26-0001 (Type I Application)

DESCRIPTION OF PROPOSAL: To divide a 30 gross acre parcel into six parcels of at least 5-acres each. Each lot will be served individual wells and on-site septic systems. Lots 1-4 will utilize shared access points on Mattson Road (public) and Lots 5 & 6 will utilize a shared access point on Cooks Hill Road (public). Wetland, Stream Assessment, and Geotechnical Reports have been provided and accepted for this proposed project.

LOCATION OF PROPOSAL: The project is located at 149 Mattson Road, Centralia, Lewis County, WA – Section 34, Township 15 N, Range 03 W, WM on parcel 023883000000.

THRESHOLD DETERMINATION:

The lead agency for this proposal has determined that it does not have a probable, significant adverse impact on the environment. An environmental impact statement (EIS) is NOT required under RCW 43.21C.030(2)(c). This decision was made after review by Lewis County of a completed environmental checklist and other information on file with this agency and such information is adopted herein by reference. This information is available electronically here:

<https://lewiscountywa.gov/departments/community-development/current-planning-applications/>

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the issue date below. The comment period begins on the date of issuance and written comments must be submitted by **4 pm on August 18, 2026**.

Responsible Official: **Mindy Brooks, Director**
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, Washington 98532

Contact Person: **Karen Witherspoon, AICP, Senior Project Planner**

Karen Witherspoon for Responsible Official

Date of Issue: **August 4, 2026**

*This SEPA determination may be appealed in writing to the Lewis County Hearings Examiner until 4 pm on **August 25, 2026** at the Lewis County Community Development Permit Center. Appellants should be prepared to make **specific factual objections**. The appeal procedure is established in Lewis County Code (LCC) Section 17.110.130 and LCC Section 2.25.130. The administrative appeal fee is established by Resolution of the Board of County Commissioners. The current adopted fee schedule is available online at <https://lewiscountywa.gov/departments/community-development/permit-applications-and-handouts/>.*

RECEIVED

By K. Witherspoon at 11:14 am, Aug 12, 2026

Karen Witherspoon, AICP, Senior Project Planner
Lewis County Community Development
125 NW Chehalis Avenue
Chehalis, WA 98532

August 4, 2026

Dear Ms. Witherspoon,

I am writing to express my concerns regarding the proposed development project located directly across from Cooks Hill. My family and I have lived here for over three years, where we operate a regenerative farm. Our livestock and market vegetables support the local community through the Chehalis and Olympia Farmers Markets, and we are deeply invested in the environmental health of this area.

I have several specific concerns regarding the impact of this project:

1. Water Supply Availability: The homes in this immediate area already face water challenges during the summer. Over the past three years, we have noticed a significant drop in the production of our 220-foot well and recently required emergency services to replace our pump due to extreme heat and drought. Even as a two-person household, we must replace our filtration system monthly in the summer due to sediment. Adding six new families pulling from the local water table is a major concern.

2. Septic Systems on Hydric Soil: According to the Lewis County GIS map, the entire project property consists of hydric soil. I am concerned about the installation of six new septic systems on this soil type. Is there sufficient dry vertical soil depth to safely filter waste, and what mitigation is planned for vertical separation above the water table?

3. Wetland Impact and Tree Removal: The proposed homes will be built on or near wetlands. Have all septic systems been planned at least 125 feet away from wildlife areas? Has a licensed, professional soil scientist or septic designer performed a formal site evaluation and soil log? Furthermore, removing trees from a wetland risks altering the hydrology, causing severe soil erosion, losing wildlife habitat, and diminishing water quality. How many trees will be removed to accommodate the heavy machinery?

4. Flood Zone Risks: Almost the entirety of the project site was affected by the 2007 flood and is designated as a FEMA flood area. How will the homes be constructed to mitigate this flooding risk?

Finally, beyond these environmental points, I am concerned about the infrastructure impact. How will Cooks Hill handle the disruption and traffic from heavy equipment and trucks on the road?

Thank you for your time and for considering these critical community impacts. I look forward to your response.

Best regards,


Jenifer Wright

Cc: Mindy Brooks



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OLYMPIA WA
5 AUG 2026 PM 4 L



Karen Witterspoon
Lewis County
Community Development
125 NW Chetah's Ave.
Chetah's, WA 98532

32-201025



4088 (Cocks Hill) Rd.

Centralia, WA 98532

From: Betsy Levy <betsy@woodbinefarmflowers.com>
Sent: Wednesday, August 12, 2026 11:29 AM
To: Karen Witherspoon
Subject: Please reconsider DNS for SEP26-0017/LLS26-0001

You don't often get email from betsy@woodbinefarmflowers.com. [Learn why this is important](#)

To Karen Witherspoon, Lewis County Community Development:

I'm writing to respectfully express my concerns about a planned large-lot development at 149 Mattson Road, Centralia – S 34,T15N,R03W on Parcel 0238000000; file numbers SEP26-0017, LLS26-0001.

I believe area water resources and conditions are inadequate to support the planned development.

I own the property at 4064 Cooks Hill Road, a 10th of a mile from one of the development's boundaries on Cooks Hill Road. On August 5th I received your letter indicating a determination of nonsignificance (DNS) for this development. Please reconsider this determination, on the basis that inadequate information about local conditions was provided/reviewed regarding the suitability of the land to accommodate 6 new homesites with septic systems and wells.

I'm very concerned that 1) based on well conditions for the surrounding properties, ground water is woefully inadequate for the number of wells, and 2) the potential of flooding/winter groundwater is too high for planned septic systems. Another water issue is that it's not clear the developer is planning adequate setback from Eagle Creek, which runs through the property footprint.

I have owned my property since 2013. A well test at purchase indicated our well produced 9 gallons per minute with a reasonable recharge rate.

In the past 13 years our well output has dwindled to less than half of that amount; at times in summer it is even lower. And yet I've been told by local well drillers that ours is the best well on Cooks Hill. Most neighboring wells produce 2 gallons or less per minute, and our neighbors directly across the road draw less than 1 gallon per minute, with every slow recharge. This last property and well were the most recently built.

For us personally, the gradual loss of our water has had a significant impact, as we launched a flower farm and floral design business when we purchased the property. We have had to scale back our original business from wholesaling at the Portland Wholesale Flower Market, to letting employees go and taking most areas out of production because irrigation water is now too limited.

In addition to these well issues, county and FEMA soil and water maps show much of the planned development sits in the 100-year flood plain and has hydric soils with very poor drainage. My strong impression is that the current 100-year flood plain map is out of date, and that '100 year' floods have been happening far more frequently in the last 20 years, as water has gone over Galvin Road near us repeatedly in the past 13 years. In any normal year, the planned development site is at best saturated in winter.

Thank you for taking the time to review this letter; I and my neighbors sincerely hope you'll revisit the Determination of Nonsignificance, conduct a full EIS review of all aspects of this project, and determine that it should be revised to reflect local water conditions.

Very sincerely,
Betsy Levy
(360) 701-0429

External Email - Remember to think before you click!
This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

August 12th 2026

RECEIVED

By K. Witherspoon at 10:12 am, Aug 14, 2026

Mindy Brooks, Director
Lewis County Community Development
125 NW Chehalis Avenue
Chehalis, WA 98532

Re: Public Comment — Large Lot Subdivision LLS26-0001 / SEPA Review SEP26-0017 (Ecology #202603169), TCI Group, 149 Mattson Road, Parcel #023883000000

Dear Director Brooks,

I am writing as a concerned neighbor to comment on the proposed TCI Group Large Lot Subdivision (LLS26-0001) at 149 Mattson Road, which would divide the parcel into six residential lots, and on the associated SEPA review (SEP26-0017). I have reviewed the application materials the County has posted, including the January 2026 critical areas report and its April 2026 third-party review, the October 2025 geotechnical report, and the well driller's letter. I appreciate that recent studies are on file. My concern is that, taken together, they do not yet resolve the flood, water, and critical-area risks this specific site presents, and I respectfully ask that the County's SEPA Responsible Official issue a Determination of Significance and require an Environmental Impact Statement — or, at a minimum, condition any approval on the additional, site-specific analysis described below.

Under the Growth Management Act and the Lewis County Critical Areas Ordinance (LCC 17.38), the County must rely on best available science (WAC 365-195-900) in evaluating impacts to critical areas. With that standard in mind, I raise five points.

1. A threshold zoning and lot-size inconsistency. The parcel is zoned Rural Development District at one dwelling unit per five acres (RDD-5), and portions are zoned RDD-20, which permits only one dwelling unit per twenty acres. Under Chapter 17.100 LCC, RDD-5 carries a five-acre minimum lot size and RDD-20 a twenty-acre minimum. Although the application describes the new lots as five acres, the preliminary drawing does not bear that out. By the drawing's own figures, only Lot 1 (5.047 acres) reaches five acres; the other five all fall below the five-acre RDD-5 minimum — Lots 2, 3, and 4 at 4.887 acres each, Lot 5 at 4.5992 acres, and Lot 6 at 4.713 acres. And Lot 1, the one lot that meets the five-acre threshold, lies largely within the RDD-20 zone, where the minimum lot size is twenty acres — so it does not conform either. On these numbers, none of the six lots cleanly satisfies the zoning that applies to it. I ask that the County verify each lot's area and zoning and reconcile the proposal with both the RDD-5 and RDD-20 requirements and the preliminary drawing before deeming the application complete.

2. The geotechnical report evaluates a smaller project than the one proposed. The October 2025 geotechnical report (Jolma Design LLC) states on its face that it “was prepared exclusively for TCI Group LLC for construction of two single-family residences.” It evaluated two new homes on the adjacent 9.81-acre parcel (023884000000), plus converting the existing house to an ADU. For the 28.7-acre parcel at issue here (023883000000) and its neighbor to the east, the report expressly states that “no specific buildings are proposed at this time,” deferring them to “some time after the land division.” In other words, its conclusion that the development is “feasible” covers two houses — not the six residential lots this application would create. That gap matters: the report maps this very parcel as moderate-to-high liquefaction susceptibility, seismic site class D to E, and peat sediments, and notes that the Lincoln Creek Fault crosses it — conditions more severe than the bedrock parcel where the two analyzed homes would sit. It also states that a comprehensive slope-stability analysis, deep subsurface explorations, and full characterization of the geohazard areas (LCC 17.38.620) were beyond its scope. Presenting a two-home feasibility study as support for a six-lot subdivision on the higher-risk parcel is misleading, and I ask that the County require a geotechnical evaluation of the full six-lot buildout on this parcel before proceeding.

3. Flooding and frequently flooded areas. This parcel is within a designated flood zone and flooded in the 2007 flood. The developer’s own critical areas report maps the site as Reed Silty Clay Loam, which the NRCS describes as a very deep, poorly drained soil located on flood plains, and it confirms hydric soils across the parcel. The wetland determination, however, rests on a single site visit on November 12, 2025, that found “no wetland hydrology” present. A one-day, late-fall observation cannot capture the seasonal and flood-driven inundation this neighborhood experiences year to year. I ask that flood frequency and drainage be evaluated under the County’s Flood Hazard Prevention Ordinance using data that reflect seasonal high water and the 2007 event, rather than a single dry-season visit.

4. Water supply and aquifer. The proposal would place six households on individual wells in an area where, because of the clay soils, surface water does not readily recharge the groundwater. Neighboring lots have had to bury reserve tanks to secure enough water to serve a single home. I understand a well driller’s letter and a geotechnical report are on file; I ask the County to confirm that they actually demonstrate a sustainable, long-term individual water supply for all six lots — and that new wells will not impair the existing neighboring wells — consistent with the requirement that the land division make adequate provision for water. If that showing rests on general area information rather than site-specific yield data, it should be supplemented before approval.

5. Eagle Creek, its buffer, and on-site septic. Eagle Creek, a DNR-classified fish-bearing stream, runs through the parcel and carries a 150-foot buffer. The critical areas report states the proposed building sites lie outside that buffer, but the third-party reviewer expressly did not conduct an independent site visit. Because each lot is proposed to rely on on-site septic, I ask the County to confirm that every lot’s building envelope, septic drainfield and reserve area, and well can all be sited outside the 150-foot buffer and outside the flood-prone, hydric portions of the parcel — with particular attention to the two lots on the Cooks Hill Road side.

These issues go directly to public health, safety, and the environment — the questions SEPA exists to answer. I respectfully request that the County:

- Verify each lot's area and zoning, and reconcile the proposal with the RDD-5 five-acre and RDD-20 twenty-acre minimums and the preliminary drawing;
- Require a geotechnical evaluation of the full six-lot buildout on Parcel 023883000000 — addressing the mapped liquefaction, site-class, peat, and fault conditions — rather than a two-home feasibility study;
- Within SEP26-0017, issue a Determination of Significance and require an Environmental Impact Statement, rather than a Determination of Nonsignificance;
- Evaluate flood frequency and drainage using data reflecting seasonal high water and the 2007 flood, under the Flood Hazard Prevention Ordinance;
- Confirm, with site-specific data, a sustainable individual water supply for all six lots that will not impair existing neighboring wells; and
- Provide the surrounding community adequate time to review the materials and comment.

I appreciate your attention to this matter and look forward to the County acting responsibly before this project proceeds. I am also submitting these comments into the SEPA record for SEP26-0017.

Best regards,

Alexandra Perl

13 August 2026

Mindy Brooks, Director
Lewis County Community Development
125 NW Chehalis Avenue
Chehalis, WA 98532

Re: Public Comment — Large Lot Subdivision LLS26-0001 / SEPA Review SEP26-0017 (Ecology #202603169), TCI Group, 149 Mattson Road, Parcel #023883000000

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2. The geotechnical report evaluates a smaller project than the one proposed. The October 2025 geotechnical report (Jolma Design LLC) states on its face that it "was prepared exclusively for TCI Group LLC for construction of two single-family residences." It evaluated two new homes on the adjacent 9.81-acre parcel (023884000000), plus converting the existing house to an ADU. For the 28.7-acre parcel at issue here (023883000000) and its neighbor to the east, the report expressly states that "no specific

buildings are proposed at this time,” deferring them to “some time after the land division.” In other words, its conclusion that the development is “feasible” covers two houses — not the six residential lots this application would create. That gap matters: the report maps this very parcel as moderate-to-high liquefaction susceptibility, seismic site class D to E, and peat sediments, and notes that the Lincoln Creek Fault crosses it — conditions more severe than the bedrock parcel where the two analyzed homes would sit. It also states that a comprehensive slope-stability analysis, deep subsurface explorations, and full characterization of the geohazard areas (LCC 17.38.620) were beyond its scope. Presenting a two-home feasibility study as support for a six-lot subdivision on the higher-risk parcel is misleading, and I ask that the County require a geotechnical evaluation of the full six-lot buildout on this parcel before proceeding.

3. Flooding and frequently flooded areas. This parcel is within a designated flood zone and flooded in the 2007 flood. The developer’s own critical areas report maps the site as Reed Silty Clay Loam, which the NRCS describes as a very deep, poorly drained soil located on flood plains, and it confirms hydric soils across the parcel. The wetland determination, however, rests on a single site visit on November 12, 2025, that found “no wetland hydrology” present. A one-day, late-fall observation cannot capture the seasonal and flood-driven inundation this neighborhood experiences year to year. I ask that flood frequency and drainage be evaluated under the County’s Flood Hazard Prevention Ordinance using data that reflect seasonal high water and the 2007 event, rather than a single dry-season visit.

4. Water supply and aquifer. The proposal would place six households on individual wells in an area where, because of the clay soils, surface water does not readily recharge the groundwater. Neighboring lots have had to bury reserve tanks to secure enough water to serve a single home. I understand a well driller’s letter and a geotechnical report are on file; I ask the County to confirm that they actually demonstrate a sustainable, long-term individual water supply for all six lots — and that new wells will not impair the existing neighboring wells — consistent with the requirement that the land division make adequate provision for water. If that showing rests on general area information rather than site-specific yield data, it should be supplemented before approval.

5. Eagle Creek, its buffer, and on-site septic. Eagle Creek, a DNR-classified fish-bearing stream, runs through the parcel and carries a 150-foot buffer. The critical areas report states the proposed building sites lie outside that buffer, but the third-party reviewer expressly did not conduct an independent site visit. Because each lot is proposed to rely on on-site septic, I ask the County to confirm that every lot’s building envelope, septic drainfield and reserve area, and well can all be sited outside the 150-foot buffer and outside the flood-prone, hydric portions of the parcel — with particular attention to the two lots on the Cooks Hill Road side.

These issues go directly to public health, safety, and the environment — the questions SEPA exists to answer. I respectfully request that the County:

- Verify each lot’s area and zoning, and reconcile the proposal with the RDD-5 five-acre and RDD-20 twenty-acre minimums and the preliminary drawing;
- Require a geotechnical evaluation of the full six-lot buildout on Parcel 023883000000 — addressing the mapped liquefaction, site-class, peat, and fault conditions — rather than a two-home feasibility study;

- Within SEP26-0017, issue a Determination of Significance and require an Environmental Impact Statement, rather than a Determination of Nonsignificance;
- Evaluate flood frequency and drainage using data reflecting seasonal high water and the 2007 flood, under the Flood Hazard Prevention Ordinance;
- Confirm, with site-specific data, a sustainable individual water supply for all six lots that will not impair existing neighboring wells; and
- Provide the surrounding community adequate time to review the materials and comment.

I appreciate your attention to this matter and look forward to the County acting responsibly before this project proceeds. I am also submitting these comments into the SEPA record for SEP26-0017.

Best regards,

A handwritten signature in black ink, appearing to read 'Alex Perl', written in a cursive style.

Alexandra Perl

RECEIVED

By K. Witherspoon at 4:43 pm, Aug 17, 2026

Kelly Burnett
287 Lincoln Creek Rd
Centralia, WA 98531

August 17, 2026

Mindy Brooks, Director
Lewis County Community Development
125 NW Chehalis Avenue
Chehalis, Washington 98532

RE: Public Comment – Large Lot Subdivision LLS26-0001/SEPA
Review SEP26-0017 (Ecology #202603169),
TCI Group, LLC, 149 Mattson Road, Parcel #023883000000

Dear Director Brooks:

I am in receipt of the Lewis County – State Environmental Policy Act, Threshold Determination, Determination of Non-Significance (DNS), issued August 4, 2026, by your office. I appreciate the opportunity to respond, as a neighbor to this property and a Lewis County farmer.

It surprised me that the proposal was deemed DNS, given the number of concerns that immediately arise around this project:

- 1) The lot-sizes are inconsistent with the Rural Development District (RDD) zoning standards. Two zoning standards need to be considered, regarding the parcel: RRD-5 and RRD-20, requiring either a 5 acre minimum or a 20 acre minimum, respectively. Only Lot 1 meets the standard for RRD-5 and that lot falls within the RRD-20 zone. The remaining tracts, Lots 2-6, fall well below the RRD-5 requirement. Approving the application, with these requirements not met, appears to be an oversight by the department and I would ask for reconciliation on this discrepancy.
- 2) The existing stream, Eagle Creek, requires a 150 foot protective buffer, as established under the Department of Natural Resources (DNR) fish-bearing stream classification. Four of the parcels may be difficult to site dwellings on, given this requirement. Please ensure that the county does an onsite review to confirm that each lot can support and conform to this requirement.
- 3) As a neighbor, for the last nine years, I have first-hand experience with the effects of the annual flooding. Furthermore, the 2007 flood, had a major effect on this area. Although I was not present for that catastrophic event, every neighbor who was will share their story of its impact. Our acreage liquefies, during the seasonal high water events, making the majority of our acres unusable for several months

of the year. A flood frequency and drainage evaluation is in order for this proposed project. The County's Flood Hazard Prevention Ordinance was instated for the purpose of evaluating these types of areas and needs to be implemented here. I would like to see what they have to report specific to this parcel.

- 4) Of major concern is the water supply and effects to the aquifer required to sustain six additional dwellings in the immediate area. Prior to approval, please demonstrate that measures have been taken and provisions are in place to ensure that these 6 sites will not impact the existing, neighboring wells.
- 5) The developer, TCI Group, LLC, initially requested a geotechnical report for the siting of two homes on the 9.81 acre parcel, #023884000000, and converting the existing house to an Adjacent Dwelling Unit (ADU). It did not include the 28.7 acre parcel, #23883000000, in the report. A full report, considering the unstable geological makeup of this area prone to annual liquefaction, lacking stable bedrock, sporting a class D-E seismic fault and peat sediments, needs to be in place, prior to further consideration of approval. Please provide such a report for public comment.

Additionally, the federal Conservation and Rehabilitation Environmental Program (CREPS) is continually requesting and cautioning farmers to participate in their program, which our property has done in the past. Without cooperation and participation, the federal government threatens to impose further regulations for re-wilding sections of existing farms. As a farmer, complying with state and federal regulations is always paramount. The CREPS office is aware of this development proposal, which if approved, will put further pressure on the existing, area farms to continue to voluntarily participate in its program, or be forced into compliance, should it be deemed necessary to invoke federal statute, in order to meet government goals. Thus, taking more existing farmland out of production. This is a consideration that I would like to request Lewis County officials, such as yourself, keep in mind, throughout the approval process of developments in these areas that are demonstratively tenuous, as residential locales.

Thank you for your attention. I look forward to receiving updates on this proposal.

Sincerely,

Kelly Burnett

cc: Karen Witherspoon, AICP
Senior Project Planner



Internal Reviewers Conditions Memo (SmartGov)

File Number: LLS26-0001

Date Printed: August 25, 2026

- Building; each lot shall have an approved parcel number and address.
- Building; each lot shall have approved water and septic.
- Survey-No comments
- Access: No comments
- On-Site Septic: No comments; soil evaluation completed (SE26-0003).
- Public Works: No Comments
- Water:
 1. Submit the water-source study described in the Environmental Health Preliminary Water Review Memo. The study must be prepared by a qualified professional and demonstrate that an adequate potable-water supply is available for each proposed lot. Additional information, including one or more test wells may be required following review of the study.
 2. Locate wells and sanitary control areas outside flood-hazard areas where feasible. Any well proposed in an area subject to flooding must comply with WAC 173-160-171 and WAC 173-160-291.
 3. Add the three Conditions of Development identified in the Environmental Health Preliminary Water Review Memo to the face of the final plat.



SEPA Comments Memo

File Number: 09/26/0017

Date Printed: August 25, 2026

- Access: Any new approach or changes to an existing approach will require a Road Approach Permit.
- Water: Environmental Health's water review comments are provided under the preliminary LLS26-0001 application. The proposal requires additional water availability information, which may be submitted prior to preliminary LLS approval. Please see the LLS26-0001 Preliminary Water Review Memo.
- Survey-No comments
- Building; Floodplain development permits will be required for development located in the SFHA
- On-Site Septic: SE26-0003; Applicant will need to apply for septic permits and hire a septic designer.
- Stormwater: Stormwater shall meet requirements as set forth in Section 15.45 of the Lewis County Code



MEMO

Date: August 17, 2026

To: Karen Witherspoon, Sr. Planner, Lewis County Community Development

From: Jeff Landrum, Environmental Health Specialist, Lewis County Public Health & Social Services

RE: LLS26-00001 – Large Lot Subdivision Preliminary Water Review Comments

Lewis County Public Health & Social Services completed a preliminary review of potable water availability the proposed six-lot large lot subdivision on Lewis County Parcel No. 023883000000, located at 149 Mattson Road. The proposal identifies one well site for each lot. Based on the information presently available, Environmental Health staff cannot yet determine that an adequate and reliable potable water supply can reasonably be developed for each proposed lot as required by LCC 16.12.480(1). In addition, proposed well sites in or near mapped flood-hazard areas may require relocation or additional protection.

Water Availability

Environmental Health reviewed 20 nearby well records. Reported yields range from 0.25 to 60 gallons per minute, with ten wells producing 2 gallons per minute or less at time of completion. Three nearby wells, approximately 160, 220, and 240 feet deep, were each tested at 1 to 1.5 gallon per minute. The site's mapped surficial geology consists of the Lincoln Creek Formation, a Tertiary marine sedimentary deposit, and Quaternary alluvium.

Property owners in the area have also reported declining or very low well production. These reports have not been independently verified and do not establish that the proposed wells will fail, but do support requiring additional information, per County Code, before determining that adequate water is available for all six lots. The applicant submitted a well-driller statement expressing confidence that water can be obtained, but no proposed well has been drilled for the subdivision, and the driller's statement does not include a well log or address yield concerns in the area.

To address the uncertainty regarding the ability of the aquifer to provide long-term safe and adequate water to the subdivision, in accordance with LCC 16.12.480(1), the applicant shall conduct a water source study completed by a qualified professional addressing expected well depths and aquifer production, seasonal groundwater availability, nearby low-producing wells, and potential yields of the six groundwater wells. Environmental Health may require one or more

test wells after reviewing the evaluation. Before final approval, the applicant must demonstrate that each lot has an adequate potable-water supply consistent with LCC 16.12.480(1)(a).

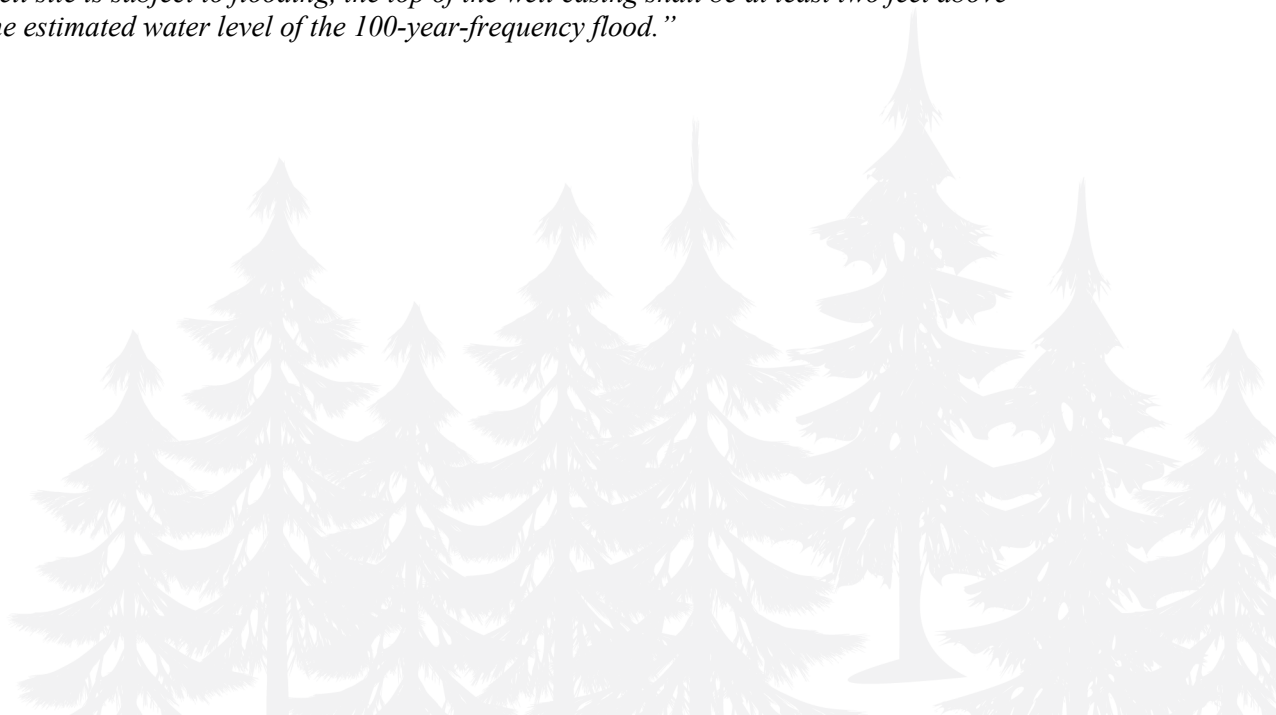
Flood-Hazard Areas

The preliminary drawing shows six proposed wells with 100-foot sanitary control areas. It also identifies portions of the site within a mapped Zone A (unstudied) 100-year floodplain and within the County's 2007 flood-inundation mapping, identified as digitized from Lewis County GIS and not surveyed. Portions of proposed Lots 3 through 6 are affected by or adjacent to these mapped areas, and proposed wells or their sanitary control areas appear within or near the mapped boundaries. The preliminary plat shall clearly identify the proposed wells, their sanitary control areas, and all applicable flood-hazard boundaries. Surveyed elevations or other technically reliable flood-hazard information shall be provided where necessary to determine whether a proposed well site is subject to flooding.

Proposed wells and their protection zones should be located outside mapped or determined flood-hazard areas where a feasible alternative exists. If a well is proposed in an area subject to flooding, the applicant shall demonstrate compliance with WAC 173-160-171 and WAC 173-160-291, including the requirements concerning ponding, floodways, protection from the 100-year flood and potentially contaminating drainage, and elevation of the well casing.

Conditions of Development Required on the Face of the Plat

1. *“Domestic groundwater use within this subdivision is subject to a maximum annual average withdrawal of three thousand (3,000) gallons per day per connection pursuant to RCW 90.94.020, and a maximum combined daily withdrawal of five thousand (5,000) gallons per day for all permit-exempt domestic uses within the subdivision pursuant to RCW 90.44.050. Irrigation is limited to no more than one-half acre of lawn or noncommercial garden, collectively.”*
2. *“Pursuant to LCC 8.40.310, each well shall maintain a 100-foot-radius Water Supply Protection Zone fully contained within the lot lines. If the protection zone cannot be fully contained within the lot, a protective or restrictive covenant approved by Lewis County Environmental Health shall be recorded against each affected property.”*
3. *“All wells shall be located and constructed in accordance with WAC 173-160-171 and WAC 173-160-291. Wells shall not be located where subject to ponding or within a floodway, except as permitted under Chapter 86.16 RCW, and shall be protected from the 100-year flood and potentially contaminating surface or subsurface drainage. Where a well site is subject to flooding, the top of the well casing shall be at least two feet above the estimated water level of the 100-year-frequency flood.”*



Karen Witherspoon

From: Kaylee Slone
Sent: Tuesday, August 11, 2026 10:54 AM
To: Karen Witherspoon
Cc: Jeffrey Landrum; Mindy Brooks; Kirsten Wecker; Michael Hamling
Subject: RE: SE26-0003 soil evals for LLS26-0001 & SEP26-0017 Mattson Road and Cooks Hill Road

Hi Karen,

I was able to look at holes on the 6 lots, so this was a typo on my part, and I apologize for that confusion. However, I did visit the site with Mike Hamling and the designer Becky Reiger.

For the soil evaluation, we are looking for a minimum of 12 inches of natural, undisturbed soil with no signs of mottling. We were able to confirm these conditions at each site.

My comment regarding the elevated water levels in the perc holes was intended to indicate that the soil conditions were less than ideal and that I needed to wait for the water levels to recede before I could properly evaluate the soil profile. Once the water levels decreased, we were able to observe a minimum of 12 inches of natural, undisturbed soil without mottling at each site.

This meets the soil criteria required for placement of a septic system on the properties.

Thank you,

Kaylee Slone
Environmental Health Specialist I
Lewis County Public Health & Social Services
Kaylee.Slone@lewiscountywa.gov
(360) 740-1349

From: Karen Witherspoon <Karen.Witherspoon@lewiscountywa.gov>
Sent: Tuesday, August 11, 2026 10:16 AM
To: Kaylee Slone <Kaylee.Slone@lewiscountywa.gov>
Cc: Jeffrey Landrum <Jeffrey.Landrum@lewiscountywa.gov>; Mindy Brooks <Mindy.Brooks@lewiscountywa.gov>; Kirsten Wecker <Kirsten.Wecker@lewiscountywa.gov>
Subject: SE26-0003 soil evals for LLS26-0001 & SEP26-0017 Mattson Road and Cooks Hill Road

Hi Kaylee,

This land division (LLS26-0001) and the SEPA Checklist are currently in the public comment stage, and several comments are saying the project has standing water/ flooding with ponding water during the year. I am looking at your approval letter for SE26-0003 for the soil evaluations for this project and I just noticed the subject line only says lots 1-4. This project is for six lot of five acres each. Is this a typo on the letter, or did they only provide test pits for four of the proposed lots? Your first notes indicated you needed to revisit the site due to elevated water in the perc holes.

Please let me know, as I may need to withdraw the SEPA determination until the concerns have been reviewed and addressed. The neighbors also have concerns about availability of water since all six lots are proposing new individual wells. Ecology has concerns related to the accuracy of the wetland report.

Thank you,

Karen

Karen Witherspoon, AICP
Senior Project Planner
Lewis County Community Development
karen.witherspoon@lewiscountywa.gov
(360) 740-2637

RECEIVED

By K. Witherspoon at 10:30 am, Aug 17, 2026



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

August 17, 2026

Karen Witherspoon, AICP, Senior Project Planner
Lewis County
Community Development
2025 Northeast Kresky Avenue
Chehalis, WA 98531

Dear Karen Witherspoon:

Thank you for the opportunity to comment on the determination of non-significance for the TCI Group Large Lot Subdivision Project (SEP26-0017) located at 149 Mattson Road as proposed by TCI Group, LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Zachary Meyer, (360) 481-9885

The critical areas report provided for the project does not address historic aerial imagery inundation onsite. This is a primary indicator of wetland hydrology (B7), and occurs near test pits in the report but is failed to be mentioned, addressed, or noted on data forms. The wetland report should be updated to include this omission of data and wetland boundaries onsite should be re-examined and appropriately delineated.

Dept of Ecology requests an opportunity to review an updated report when it is made available to ensure that wetland onsite are appropriately identified. A site visit may be necessary. Impacts to wetlands would require permitting from Dept of Ecology under RCW 90.48 WA Water Pollution Control Act.

For questions or technical assistance, please reach out Dept of Ecology Shorelands Technical and Regulatory Lead Zach Meyer at zachary.meyer@ecy.wa.gov.

SOLID WASTE MANAGEMENT: Derek Rockett (360) 995-3176

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. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

Karen Witherspoon

August 17, 2026

Page 2

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202603169)

cc: Zachary Meyer, SEA
Derek Rockett, SWM

Karen Witherspoon

From: James Gordon <jgordon@cowlitz.org>
Sent: Tuesday, August 18, 2026 4:13 PM
To: Kylie Peckham
Cc: Karen Witherspoon; Stone, Jessica (DAHP)
Subject: Re: SEP26-0017 - Large Lot Subdivision for TCI Group, LLC
Attachments: CIT Unanticipated Discoveries Protocol - June 2026.pdf; CIT Cultural Resource Protection Laws - Feb 2026.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom It May Concern:

Given that the above-referenced project is within the Cowlitz Indian Tribe's territory, the Tribe's Cultural Resources Department (CRD) would like to state its interest. The Tribe attaches religious and cultural significance to cultural resources throughout our area of concern, and this includes archaeological resources, traditional cultural properties, and elements of the built environment.

The Cowlitz Indian Tribe is a federally recognized Indian Tribe of southwest Washington and northern Oregon. Since Time Immemorial, the Cowlitz people have hunted, fished, and gathered across this dynamic landscape, following a strategic seasonal round of resource acquisition. As an integrated part of Cowlitz traditional lifeway, the Tribe attaches religious and cultural significance to properties throughout Lewis County.

Question 1 compliance

The description for this project is as follows: "The proposal is a 6-lot subdivision and each lot will be developed for residential use."

Question 1e is as follows: "Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill." The response to this question lacks detail: (verbatim) "None will be disturbed during the subdivision process. When the lots are developed into residences it will depend on the new owner's plans." This answer does NOT account for any necessary utilities (water, sewer / septic, electrical, roads, gas lines, etc.) or their associated (varying) depths. Hence, this answer is inadequate and incomplete, since the project description indicates that approval of the subdivision process is part of this proposal.

Question 13 compliance

Much of Lewis County has a high probability to contain archaeological resources and traditional cultural places. Whenever you are the lead agency for SEPA determination and conditioning, please require a professionally reasoned cultural resources survey to ensure that Question 13 is adequately answered. The answers provided for the four sections of Question 13 were as follows: No, No, None, None. This is woefully inadequate.

The components of Question 13 cannot be answered without a process that incorporates historic research, Tribal consultation, data gathering and professional field investigation. SEPA rules require that decisions made during environmental review be based on sufficient information. Threshold

determinations must be "based upon information reasonably sufficient to evaluate the environmental impact of a proposal (WAC 197-11-33 5)." WAC 197-11-080(1) states that "(I)f information on significant adverse impacts essential to a reasoned choice among alternatives is not known, and the costs of obtaining it are not exorbitant, agencies shall obtain and include the information in their environmental documents;" and "(W)hen there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists."

The rule goes on to say that "When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists (WAC 197-11-080(2))." In addition to this, WAC 197-11-080(3) says that if information is not available or costs too much to obtain or if the means to obtain the information is speculative or unknown, the agency may proceed but it "shall generally indicate in the appropriate environmental documents its worst case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed." Therefore, without a professionally reasoned archaeological investigation of a proposed project area, it must be assumed that the entire area contains an archaeological site of cultural significance.

Please require that cultural resources firms who perform these surveys send all complete but draft survey reports to our Department for review and comment. Having included the Cultural Resources Department in that step of answering Question 13 of the SEPA checklist ensures smoother project delivery for applicants. These can be emailed to crdreview@cowlitz.org

Consultation Communication Preferences

When consulting with CRD, we ask that Lewis County observe the following communication protocol:

For most consultation requests, it is appropriate to address them to the Chairman of the General Council. At present, this is William "Bill" Iyall, who can be reached at wiyall@cowlitz.org. When you email the General Council Chairman, please send a copy to his executive assistant – Lori Goodwin – at lgoodwin@cowlitz.org.

When you send a request for consultation or a notification to the Chairman concerning a cultural resources issue, please also send a copy to one of the following email addresses:

If you are consulting about a project inside the Cowlitz Reservation, lands held in trust for the Cowlitz Indian Tribe, or Cowlitz Tribal fee lands, please direct your emails to thpo@cowlitz.org.

This will get your email to the Cowlitz Tribal Historic Preservation Officer, who exercises the same authority on Cowlitz Tribal lands as the Washington State Historic Preservation Officer on other lands in the State of Washington.

If you are consulting about project outside the Cowlitz Reservation or lands held in trust for the Cowlitz Indian Tribe, or Cowlitz Tribal fee lands, please direct your emails to CRDreview@cowlitz.org. This address is appropriate for confidential information about archaeological sites and traditional cultural places as discussed in Washington State public records law (RCW 42.56.300).

Both emails go to multiple staff and it will increase the chances that someone sees your inquiry and responds promptly.

In addition, the Cowlitz Indian Tribe recommends an Unanticipated Discovery Protocol be attached to the permit in the event of ground-disturbing activity; we have attached language for your consideration.

This determination is based on all currently available knowledge and is subject to revision should new information arise. Please contact James Gordon at jgordon@cowlitz.org or (360) 957-3004 with any questions or concerns you may have. We look forward to working with you on this undertaking.

náxw̓4q̓wul'as (Thank you),

James Gordon, MA
Archaeologist

jgordon@cowlitz.org

D: (360) 577-5680 ext. 2222 | C: (360) 957-3004

www.Cowlitz.org

PO Box 2547

Longview, WA 98632



My work hours may not look like yours, so please respond at a time that is convenient for you.

Confidentiality Notice: This email, including any attachments, may contain confidential or privileged information intended only for the recipient. If you are not the intended recipient, or if you believe that you have received this email in error, please contact the sender and delete this message immediately. Any unauthorized review, use, disclosure, or distribution is strictly prohibited. The Archaeological Resources Protection Act (16 USC § 470hh), the National Historic Preservation Act (54 USC § 307103), and public records laws from Washington (RCW 43.56.300) and Oregon (ORS 192.345[11]) all protect information regarding cultural resources.

From: Kylie Peckham <Kylie.Peckham@lewiscountywa.gov>
Sent: Friday, July 31, 2026 11:11 AM
Cc: Karen Witherspoon <Karen.Witherspoon@lewiscountywa.gov>
Subject: SEP26-0017 - Large Lot Subdivision for TCI Group, LLC

WARNING: This email originated outside of the Cowlitz Indian Tribe. Please verify sender before replying, opening attachments or clicking on links.

Hello,

Lewis County has received a SEPA checklist for a Large Lot Subdivision for TCI Group, LLC.

The information is being forwarded to you for review and comment.

All documentation relating to this project can be found here:

<https://lewiscountywa.gov/departments/community-development/current-planning-applications/tci-group-large-lot-subdivision/>. The lead agency is Lewis County, and the issue date of the DNS is August 4, 2026.

Please review the documents and make all comments to Karen Witherspoon, Lewis County Community Development at Karen.Witherspoon@lewiscountywa.gov. Comments are due by 4:00pm on August 18, 2026.

Thank you,

Kylie Peckham

Office Assistant Senior

Lewis County Community Development

360-740-1435

Work Hours: Wednesday - Friday; 8:00 am - 5:00 pm

External Email - Remember to think before you click!
This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.



KEEP A COPY OF THIS DOCUMENT ON-SITE DURING PROJECT WORK

COWLITZ INDIAN TRIBE

UNANTICIPATED DISCOVERY PROTOCOL

In the event any archaeological artifacts, historic-period items, human remains, or potential human remains are encountered during project activity, the following actions must be taken:

1. Stop work immediately within 100 ft. (30 m) of the find; and
2. Implement reasonable measures to protect the find from further disturbance; and
3. Notify the Cowlitz Indian Tribe, the property owner, and the appropriate state historic preservation office (SHPO) or tribal historic preservation office (THPO). Please see the next page for contact information.
4. Notify the federal, state, county, city, or other local agency that has permitted or allowed the project to proceed.

If the find contains **human remains or potential human remains**, the on-site supervisor will also need to contact the appropriate county coroner or medical examiner and state physical anthropologist, as appropriate. ***Please do not report the find on social media or to the press.***

After these initial contacts, the project proponent (as advised by a professional cultural resources contractor) will need to arrange for communications between the Cowlitz Indian Tribe, potentially other Tribes, and the appropriate SHPO/THPO regarding next steps.

Legal Authority for This Protocol

Federal Lands, Approval, or Funding	Washington State (public and private land)	Oregon State (public and private land)
National Historic Preservation Act - 36 CFR 800.13 "Post Review Discoveries"	RCW 27.53.060 "Disturbing archaeological resource or site"	ORS 358.920 "Prohibited conduct" [re: archaeological sites]
Native American Graves Protection & Repatriation Act - 43 CFR 10.5 "Discoveries"	RCW 27.44.055 "Skeletal human remains – Duty to notify"	ORS 358.950 "When notice to Indian tribe required"
Archaeological Resources Protection Act - 43 CFR 7.4 "Prohibited Acts"	RCW 68.50.020 "Notice to Coroner or Medical Examiner"	ORS 97.745 "Prohibited acts" [re: Indian graves] ORS 97.760 "Civil action by Indian tribe" ORS 146.100 "Notification"

COWLITZ INDIAN TRIBE



Useful Contact Information

Jon Shellenberger, Director Cultural Resources Department Cowlitz Indian Tribe PO Box 2547 Longview, WA 98632 Cellular: 360-947-1620 jshellenberger@cowlitz.org	Sean Hess, Interim THPO Cultural Resources Department Cowlitz Indian Tribe PO Box 2547 Longview, WA 98632 Cellular: 360-846-8923 shess@cowlitz.org
Dr. Rob Whitlam, Washington State Archaeologist Department of Archaeology and Historic Preservation (DAHP) PO Box 48343 Olympia, WA 98504-8343 Office: 360-890-2615 rob.whitlam@dahp.wa.gov	Dr. Guy Tasa, WA State Physical Anthropologist Department of Archaeology and Historic Preservation (DAHP) PO Box 48343 Olympia, WA 98504-8343 Office: 360-790-1633 guy.tasa@dahp.wa.gov
John Pouley, OR State Archaeologist Oregon State Historic Preservation Office Oregon Parks & Recreation Department 725 Summer St NE, Suite C Salem, OR 97301 Phone: 503-480-9164 john.pouley@opr.d.oregon.gov	Dr. Elissa Bullion, OR State Physical Anthropologist Legislative Commission on Indian Services Oregon State Capitol Building 900 Court Street, NE, Room 167 Salem, Oregon 97301 Phone: 503-986-1067 elissa.bullion@oregonlegislature.gov

Version: cit unanticipated discoveries protocol - june 2026_clean



Cultural Resource Protection Laws

This list is not all-inclusive and does not take the place of consultation.
(Revised February 2026)

Cowlitz Tribal Laws

Law	Where and When It Applies	Implementing Regulations and Link
Cowlitz Tribal Code (CTC) Title 11 "Traditional Culture"	Projects undertaken by the Cowlitz Indian Tribe	https://cowlitz.tribal.codes/CTC/11 (Note: revision process underway)
Ordinance 15-01 "Business Lease Ordinance"	Leasing of Cowlitz tribal land under the terms of the federal HEARTH Act	Please contact the Cultural Resources Department for details.
CTC Section 26.04.020 "Theft"	Tribal lands when someone removes property (including artifacts) without permission	https://cowlitz.tribal.codes/CTC/26.04.020
CTC Section 26.06.090 "Privacy in Communications"	This section makes it a Class C offense to intentionally disclose Tribal information like archaeological site maps or other records that are marked "confidential."	https://cowlitz.tribal.codes/CTC/26.06.090

COWLITZ INDIAN TRIBE



Federal Laws

Law	Where and When It Applies	Implementing Regulations and Link
Section 106 of the National Historic Protection Act (54 USC § 306108)	Projects with Federal funding or approval, permit, or license regardless of location	36 CFR 800 https://www.ecfr.gov/current/title-36/chapter-VIII/part-800?toc=1
Native American Graves Protection and Repatriation Act (25 USC § 3001 <i>et seq.</i>)	When human remains are found during projects on Federal or Tribal lands; Museums, that receive Federal funds	43 CFR 10 https://www.ecfr.gov/current/title-43/subtitle-A/part-10
Archeological Resources Protection Act (16 USC § 470aa-mm)	When parties seek a permit to excavate archaeological sites on Federal or Tribal lands; illegal excavation; illegal sale of artifacts	43 CFR 7 (General Federal regulations) https://www.ecfr.gov/current/title-43/subtitle-A/part-7 25 CFR 262 (provisions for Indian land) https://www.ecfr.gov/current/title-25/chapter-I/subchapter-L/part-262
Executive Order 13007 "Sacred Sites"	Projects taking place on Federal or Tribal; locations where Tribes have identified "sacred sites"	EO 13007 and individual agency Native American policy statements https://www.doi.gov/pmb/cadr/programs/native/Executive-Order-13007
Executive Order 13175 "Consultation and Coordination with Indian Tribal Governments"	Whenever the Executive Branch is considering policies with tribal implications	EO 13175 and individual Federal agency Native American policy statements https://www.federalregister.gov/documents/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal-governments



Washington State Laws

Law	Where and When It Applies	Law and Regulation Links
Archaeological Sites and Resources	Any time an archaeological site is present on private or state lands in Washington; excavation permit requirements	Law (RCW 27.53) https://apps.leg.wa.gov/RCW/default.aspx?cite=27.53 Regulations (WAC 25-48) https://app.leg.wa.gov/wac/default.aspx?cite=25-48
Indian Graves and Records	Any time Native American remains are found on private or state lands; cairns; Indian rock images	Law (RCW 27.44) https://app.leg.wa.gov/rcw/default.aspx?cite=27.44 Regulations (WAC 25-48) https://app.leg.wa.gov/wac/default.aspx?cite=25-48
Human Remains	Any time that someone finds any human remains, reporting is required	Law (RCW 68.50) https://app.leg.wa.gov/rcw/default.aspx?cite=68.50
Public Records Act	Controls the distribution of information about archaeological site and traditional cultural place locations	Law (RCW 42.56.300) https://app.leg.wa.gov/rcw/default.aspx?cite=42.56.300
Forest Practices Act	DNR required to notify Tribes of proposed forest practices to facilitate cultural resource review	Law (RCW 76.09) https://app.leg.wa.gov/RCW/default.aspx?cite=76.09 Notice of Forest Practices to Affected Indian Tribes https://apps.leg.wa.gov/WAC/default.aspx?cite=222-20-120
Executive Order 21-02 "Archaeological and Cultural Resources"	Establishes a State parallel to Federal Section 106 for projects that receive State capital funding	Executive Order https://dahp.wa.gov/sites/default/files/eo_21-02.pdf



Oregon State Laws

Law	When and Where it Applies	Law and Regulation Links
Indian Graves and Protection Act	Whenever someone finds Native American remains; prohibits disturbance, sale, or display;	Law (ORS 97.740-S 97.760) https://oregon.public.law/statutes/ors_chapter_97
Archaeological Objects and Sites	Whenever someone is seeking to excavate an archaeological site on private or state lands; prohibits sale of artifacts obtained illegally; tribal notice required	Law (ORS 358.905 -358.995) https://oregon.public.law/statutes/ors_chapter_358 Regulations (OAR 736-051) https://oregon.public.law/rules/oar_736-051-0080
Records; Public Reports and Meetings	Records regarding archaeological sites or objects are exempted from public disclosure	Law (ORS 192.345(11)) https://www.oregonlegislature.gov/bills_laws/ors/ors192.html
Comprehensive Land Use Planning	Application of Oregon land use planning to historic properties, including archaeological sites	Law (ORS 197) https://www.oregonlegislature.gov/bills_laws/ors/ors197.html



Lewis County Community Development

125 NW Chehalis Avenue Chehalis WA 98532 | (360) 740-1146 | www.lewiscountywa.gov

Administrative Appeal

Appeal of Type I or Type II Administrative Decision

Site Information

Parcel Number(s): 023883000000 **Zoning:**RRD5 and RRD20 **Acreage:** 28.7 **Permit Number:** N/A

File Number: SEP26-0017 & LLS26-0001

SEPA Number: 202603169

Appeal Information

Specific identification of decision being appealed:

- ☐ SEPA Determination
(Appeal authorized per LCC 17.110.130)
- ☒ Type I Administrative Decision as identified in LCC 17.05.040(2) Table 17.05-2
(Appeal authorized per LCC 17.05.040(2) Table 17.05-1)
- ☐ Type II Administrative Decision as identified in LCC 17.05.040(2) Table 17.05-2
(Appeal authorized per LCC 17.05.040(2) Table 17.05-1)

Specific grounds for petition, concise statement of the factual reason for the appeal, and identification of the policies, statutes, codes, or regulations that the petitioner claims are violated (attach additional sheets as necessary):

This appeal challenges the SEPA Determination of Nonsignificance (DNS) issued for the TCI Group Large Lot Subdivision at 149 Mattson Road, Parcel 023883000000. The DNS was based on documentation that references a two-lot/two-residence proposal, while the current proposal is for six lots and potentially six residences. The Washington State Department of Ecology's August 17, 2026 letter identifies an unaddressed wetland-hydrology deficiency, and Lewis County GIS mapping shows hydric soils on and around the property. Full grounds, code and statute citations (including LCC 8.40.310, LCC 15.35, RCW 90.44.050, and RCW 90.94.020), and requested relief are set forth in the attached statement.

See attached document ("Appeal of State Environmental Policy Act Threshold Determination") for the complete statement of grounds, exhibits, and signatures.

APPEAL OF STATE ENVIRONMENTAL POLICY ACT THRESHOLD DETERMINATION DETERMINATION OF NONSIGNIFICANCE (DNS)

TCI Group Large Lot Subdivision — 149 Mattson Road

Date of Issue: August 23, 2026

Project: TCI Group Large Lot Subdivision

Project Number: LSS26-0001

SEPA Review: SEP26-001

Parcel: 023883000000

Applicant: TCI Group, LLC

Property: 149 Mattson Road, Lewis County, Washington

To: Lewis County Community Development / Appropriate Hearing Authority

Introduction

Per LCC 17.110.130 and 2.25.130, we are appealing the SEPA Determination of Nonsignificance (DNS) of the proposed TCI Group Large Lot Subdivision at 149 Mattson Road.

A large concern is that the documents in LSS26-001 are not consistent with the project described in SEP26-001. The project in the SEPA is substantially different from the project originally evaluated in the geotechnical report (document - GeoReport_20251013) included in LSS-26-001. The earlier application focused on two lots/two residences on parcel 02388400000, while the SEPA current proposal (document reference - LSS26-0001 application.pdf) involves six lots and potentially six residences, specifically on parcel 023883000000.

Because of this significant change in scope, we believe the County should remove the DNS and ensure that the environmental, water, flooding, wetland, geotechnical, hydric-soil, and septic are fully evaluated for the six-lot proposal and any issues are addressed.

1. The Current Six-Lot Proposal Is Different From the Two-Residence development scope used in the Geological Report.

The County's earlier determination was based on a substantially smaller proposal involving two lots/two residences. Only one of the test pits used for the LSS26-0001 Geotechnical Report is located on parcel 023883000000 and that pit was not consistent with the majority of the parcel which includes:

- 100 year Flood plain - refer to Water Section page 5 of the SEPA Environmental Checklist
- Hydric soils - see document - CRITICAL AREA REPORT - wetland - 04192026 - Wetland Test Plots 1-15
- Classification of Lots 2 and 3 as "Moderate to High" susceptibility to liquefaction. See Liquefaction Susceptibility Report (Palmer 2007), Figure 5
- and/or - Steep Slope critical area, 27 - Buckpeak silt loam, 30-65 percent slopes - see NRCS soil map page 9 of Custom Soil Resource Report for Lewis County Area, Washington Mattson Rd Development, attachment 3.

The current Subdivision proposal would allow six lots and potentially six residences, with additional wells, septic systems, driveways, grading, impervious surfaces, and drainage impacts.

We request that the County ensure that the studies and determinations supporting the earlier two-lot proposal are applicable to the development of a six-lot subdivision.

2. Proposed lot sizes are inconsistent with RDD zoning.

Parcel 023883000000 is zoned Rural Development District at one dwelling unit per five acres (RDD-5), and portions are zoned RDD-20, which permits only one dwelling unit per twenty acres. Under Chapter 17.100 LCC, RDD-5 carries a five-acre minimum lot size and RDD-20 a twenty-acre minimum. Although the application describes the new lots as five acres, the preliminary drawing does not bear that out. By the drawing's own figures, only Lot 1 (5.047 acres) reaches this threshold; the other five all fall below the five-acre RDD-5 minimum — Lots 2, 3, and 4 at 4.887 acres each, Lot 5 at 4.5992 acres, and Lot 6 at 4.713 acres. Also Lots 1 and 5, partially lie within the RDD-20 zone, each well below the minimum lot size of twenty acres. Per the preliminary drawings (LLS26-001 Preliminary Drawing), none of the six lots cleanly satisfies the zoning that applies to it.

We request that the County evaluate and reconfirm that the lots meet the zoning requirements established by the County.

3. Department of Ecology Identified an Important Wetland Deficiency that needs to be addressed.

This concern is supported by the Washington State Department of Ecology's August 17, 2026 letter regarding this project. The Department of Ecology (DoE) specifically found that the critical areas report did not address historic aerial imagery showing inundation onsite. The DoE states that this information is a primary indicator of wetland hydrology.

The DoE requested that the wetland report be updated, that onsite wetland boundaries be re-examined and appropriately delineated, and that DoE be given an opportunity to review the updated report.

The DoE also stated that impacts to wetlands may require permitting under RCW 90.48.

Given that the Department of Ecology has identified these unresolved issues, we do not believe the existing critical areas information should be treated as complete until the requested review has occurred.

We request this review from the County.

4. Flooding impact, Wetlands, and Drainage Need to Be Evaluated.

The property has flooding and inundation concerns, outlined in the flood information and maps submitted with this appeal, and in the geotechnical report and attachments on file for this application (Documents - GeoReport_20251013 and CRITICAL AREA REPORT - wetland - 04192026).

The historic inundation identified by the Department of Ecology makes it especially important to determine the actual extent of wetland and flood-related conditions on the property.

This parcel is within a designated flood zone and flooded in 2007. The developer's own critical areas report maps the site as Reed Silty Clay Loam, which the NRCS describes as a very deep, poorly drained soil located on flood plains, and it confirms hydric soils across the parcel. The wetland determination, however, rests on a single site visit on

November 12, 2025, that found “no wetland hydrology” present. A one-day, late-fall observation cannot capture the seasonal and flood-driven inundation this neighborhood experiences year to year.

The same report shows that all 15 test areas are hydric, with the remark; “Soil has evidence of being hydric as mottling is present in the profile as is expected in this soil series.”

We request that the flood frequency and drainage be evaluated under the County’s Flood Damage Prevention Ordinance using data that reflects seasonal high water and the 2007 event, rather than a single dry-season visit.

Further, we request that the proposal should be evaluated for compliance with LCC Chapter 15.35 and 15.35.230 (Flood Damage Prevention Ordinance; subdivision proposals); LCC 17.38 (frequently flooded areas) and review how six residences, six septic systems, additional driveways, grading, and increased impervious surfaces could change drainage or increase flooding impacts to neighboring properties.

5. Septic and Minimum Land-Area Requirements need further review (Lewis County Code Chapter 8.40).

The County should require the applicant to demonstrate, for each proposed lot, that adequate buildable areas and septic/drainage areas exist and that development can occur without adversely affecting drainage or regulated wetland resources.

This project is governed by and should meet Lewis County Code Chapter 8.40, including LCC 8.40.310, which establishes requirements for developments and subdivisions using on-site sewage systems (OSS).

LCC 8.40.310 requires the local health officer to determine the minimum land area, and may require larger lot sizes when necessary for public-health protection. We are concerned that this review has not happened and that the proposed six-lot division will not meet the requirements for public health, surface water and groundwater quality, topography, geology, ground cover, climatic conditions, sewer availability, land-use and growth patterns, zoning, and applicable nitrogen limits. LCC 8.40.310 also requires lot configurations that accommodate the applicable water-supply protection zone and of at least a 100-foot radius for each existing or proposed well site for subdivisions with nonpublic wells.

These requirements are especially significant because the property has documented flooding, inundation, drainage, wetland, and groundwater concerns. The project proposal should demonstrate that each of the six lots has sufficient usable area for their proposed septic system and required reserve area, while maintaining applicable setbacks and adequate separation from wells, groundwater, wetlands, surface water, and other site constraints.

Lewis County's septic permitting (LCC 8.40) also identifies a 125-foot separation from mapped wetlands or hydric soils. If any portion of the proposed development, including structures or septic systems, is within 125 feet of mapped wetlands or hydric soils, a qualified wetland consultant should verify and delineate wetlands and determine compliance with applicable setbacks before approving the six-lot development. Each of the six proposed lots should demonstrate that sufficient buildable area remains after applying the applicable hydric-soil/wetland setbacks, septic primary and reserve areas, well protection areas, drainage requirements, and other applicable setbacks. If these constraints leave insufficient usable area on any proposed lot, that lot may not be capable of supporting the proposed residence and on-site sewage system as currently configured.

We therefore request that the on-site sewage systems proposed in this project have been reviewed for compliance and approved by the local health officer and that the applicant demonstrates adequate buildable areas and septic/drainage areas without adverse effects to drainage or regulated wetland resources.

6. The proposed project pushes the limits of Water Availability for the region.

Under RCW 90.44.050, certain domestic groundwater withdrawals are exempt from the normal groundwater permitting requirement when the withdrawal does not exceed 5,000 gallons per day in aggregate. The statute expressly applies to "single or group domestic uses."

The property is also within the area addressed by RCW 90.94.020, which specifically includes WRIA 22 (Lower Chehalis) and WRIA 23 (Upper Chehalis). The Department of Ecology WRIA 22/23 Watershed Plan Addendum identifies the Lincoln Creek upland area — which includes this parcel — as an area of known limited groundwater availability. RCW 90.94.020(5)(e)(ii) provides that, for new domestic uses relying on permit-exempt groundwater withdrawals, the applicable maximum annual-average withdrawal is 3,000 gallons per day per connection unless applicable rules provide otherwise.

Given that this is a single project, we request that the total anticipated domestic water demand for all six lots in aggregate - with anticipated 4-person households and potential ADUs (reference - Housing Section of SEPA Environmental Checklist) - be validated for compliance with RCW 90.44.050, RCW 90.94.020, and all applicable WRIA/Chehalis Basin requirements.

For these reasons, we respectfully request that the County remove the Determination of Nonsignificance.

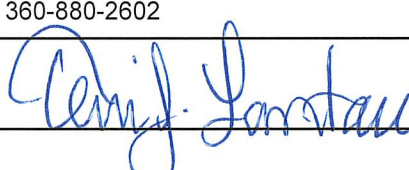
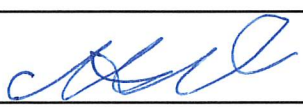
Prior to any proposal approval, we would like to ensure that the following issues are resolved:

1. Confirm that the environmental review adequately addresses the current six-lot proposal rather than the earlier two-lot proposal;
2. Confirm that the proposed lots meet zoning requirements;
3. Require the critical areas/wetland report to be updated as requested by the Department of Ecology;
4. Require onsite wetland boundaries to be re-examined and appropriately delineated;
5. Allow the Department of Ecology an opportunity to review the updated wetland report, as requested in its August 17, 2026 letter;
6. Determine whether any wetland impacts require additional permitting under RCW 90.48;
7. Flood frequency and drainage are evaluated using data that reflects seasonal high water and the 2007 flood event, and plans comply with LCC Chapter 15.35 and 15.35.230;
8. Confirm adequate septic capacity and suitable development areas for all six lots in accordance with LCC 8.40.310, taking into account setbacks for hydric soils;
9. Confirm lawful water availability for the entire six-lot development and compliance with RCW 90.44.050, RCW 90.94.020 and applicable WRIA and Chehalis Basin requirements;
10. Require the applicant to provide adequate site-specific documentation demonstrating that each proposed lot can independently satisfy applicable building, septic, drainage, critical-area, and water-supply requirements.

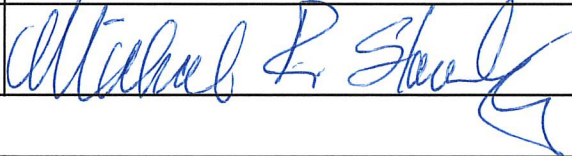
We appreciate your attention to this matter and look forward to the County reconsidering the viability of this project and its impact on the community before this project proceeds.

Respectfully submitted,

Joint Petitioners:

Petitioner 1	
Name	Albert Foster
Address	4088 Cooks Hill Road, Centralia, WA 98531
Phone	206-910-7394
Signature	
Petitioner 2	
Name	Jenifer Wright
Address	4088 Cooks Hill Road, Centralia, WA 98531
Phone	425-919-9990
Signature	
Petitioner 3	
Name	Duane Lantau
Mailing Address	520 W River Road, Centralia, WA 98531 - (Site Address 4053 Cooks Hill Road)
Phone	360-520-2960
Signature	
Petitioner 4	
Name	Terri Lantau
Mailing Address	520 W River Road, Centralia, WA 98531 - (Site Address 4053 Cooks Hill Road)
Phone	360-880-2602
Signature	
Petitioner 5	
Name	Alexandra Perl
Address	141 Otto Road, Centralia WA 98531
Phone	510-853-2226
Signature	

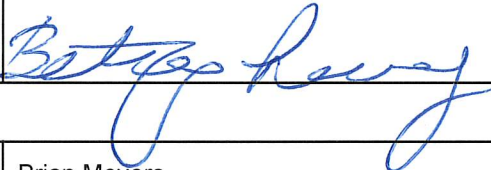
Petitioner 6

Name	Michael R Stanley
Address	4057 Cooks Hill Road, Centralia WA 98531
Phone	719-440-2077
Signature	

Petitioner 7

Name	Colette Roberts
Address	4057 Cooks Hill Road, Centralia WA 98531
Phone	719-357-2683
Signature	

Petitioner 8

Name	Betsy Levy
Address	4064 Cooks Hill Road, Centralia WA 98531
Phone	360-701-0429
Signature	

Petitioner 9

Name	Brian Meyers
Address	4064 Cooks Hill Road, Centralia WA 98531
Phone	360-481-7599
Signature	

Petitioner 10

Name	Kelly Burnett
Address	287 Lincoln Creek Road, Centralia WA 98531
Phone	907-723-1842
Signature	

Attachments and References:

Attachment 1: Lewis County SEPA Threshold Determination (DNS) Dated August 4, 2026

Attachment 2: Washington State Department of Ecology letter dated August 17, 2026

Attachment 3: Lewis County GIS map showing the subject parcel and surrounding mapped Critical Areas: Hydric Soils, Flood and Steep Slope areas

Reference 1: NRCS soil map page 9 of Custom Soil Resource Report for Lewis County Area, Washington Mattson Rd Development from Geotechnical Report dated October 13, 2025

Additional references include the complete list of documents submitted with the LLS26-001 application for SEPA# 202603169.

**LEWIS COUNTY – STATE ENVIRONMENTAL POLICY ACT
THRESHOLD DETERMINATION
DETERMINATION OF NONSIGNIFICANCE (DNS)**

LEAD AGENCY: Lewis County – Community Development Department

PROPONENT: TCI Group, LLC (tcigroupllc23@gmail.com)

FILE NUMBERS: SEP26-0017 & LLS26-0001 (Type I Application)

DESCRIPTION OF PROPOSAL: To divide a 30 gross acre parcel into six parcel of at least 5-acres each. Each lot will be served individual wells and on-site septic systems. Lots 1-4 will utilize shared access points on Mattson Road (public) and Lots 5 & 6 will utilize a shared access point on Cooks Hill Road (public). Wetland, Stream Assessment, and Geotechnical Reports have been provided and accepted for this proposed project.

LOCATION OF PROPOSAL: The project is located at 149 Mattson Road, Centralla, Lewis County, WA – Section 34, Township 15 N, Range 03 W, WM on parcel 023883000000.

THRESHOLD DETERMINATION:

The lead agency for this proposal has determined that it does not have a probable, significant adverse impact on the environment. An environmental impact statement (EIS) is NOT required under RCW 43.21C.030(2)(c). This decision was made after review by Lewis County of a completed environmental checklist and other information on file with this agency and such information is adopted herein by reference. This information is available electronically here:

<https://lewiscountywa.gov/departments/community-development/current-planning-applications/>

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the issue date below. The comment period begins on the date of issuance and written comments must be submitted by **4 pm on August 18, 2026**.

Responsible Official: **Mindy Brooks, Director**
Lewis County Community Development
125 NW Chehalis Ave
Chehalis, Washington 98532

Contact Person: **Karen Witherspoon, AICP, Senior Project Planner**

Karen Witherspoon for Responsible Official

Date of Issue: **August 4, 2026**

*This SEPA determination may be appealed in writing to the Lewis County Hearings Examiner until 4 pm on **August 25, 2026** at the Lewis County Community Development Permit Center. Appellants should be prepared to make **specific factual objections**. The appeal procedure is established in Lewis County Code (LCC) Section 17.110.130 and LCC Section 2.25.130. The administrative appeal fee is established by Resolution of the Board of County Commissioners. The current adopted fee schedule is available online at <https://lewiscountywa.gov/departments/community-development/permit-applications-and-handouts/>.*



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

August 17, 2026

Karen Witherspoon, AICP, Senior Project Planner
Lewis County
Community Development
2025 Northeast Kresky Avenue
Chehalis, WA 98531

Dear Karen Witherspoon:

Thank you for the opportunity to comment on the determination of non-significance for the TCI Group Large Lot Subdivision Project (SEP26-0017) located at 149 Mattson Road as proposed by TCI Group, LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Zachary Meyer, (360) 481-9885

The critical areas report provided for the project does not address historic aerial imagery inundation onsite. This is a primary indicator of wetland hydrology (B7), and occurs near test pits in the report but is failed to be mentioned, addressed, or noted on data forms. The wetland report should be updated to include this omission of data and wetland boundaries onsite should be re-examined and appropriately delineated.

Dept of Ecology requests an opportunity to review an updated report when it is made available to ensure that wetland onsite are appropriately identified. A site visit may be necessary. Impacts to wetlands would require permitting from Dept of Ecology under RCW 90.48 WA Water Pollution Control Act.

For questions or technical assistance, please reach out Dept of Ecology Shorelands Technical and Regulatory Lead Zach Meyer at zachary.meyer@ecy.wa.gov.

SOLID WASTE MANAGEMENT: Derek Rockett (360) 995-3176

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. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

Karen Witherspoon
August 17, 2026
Page 2

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

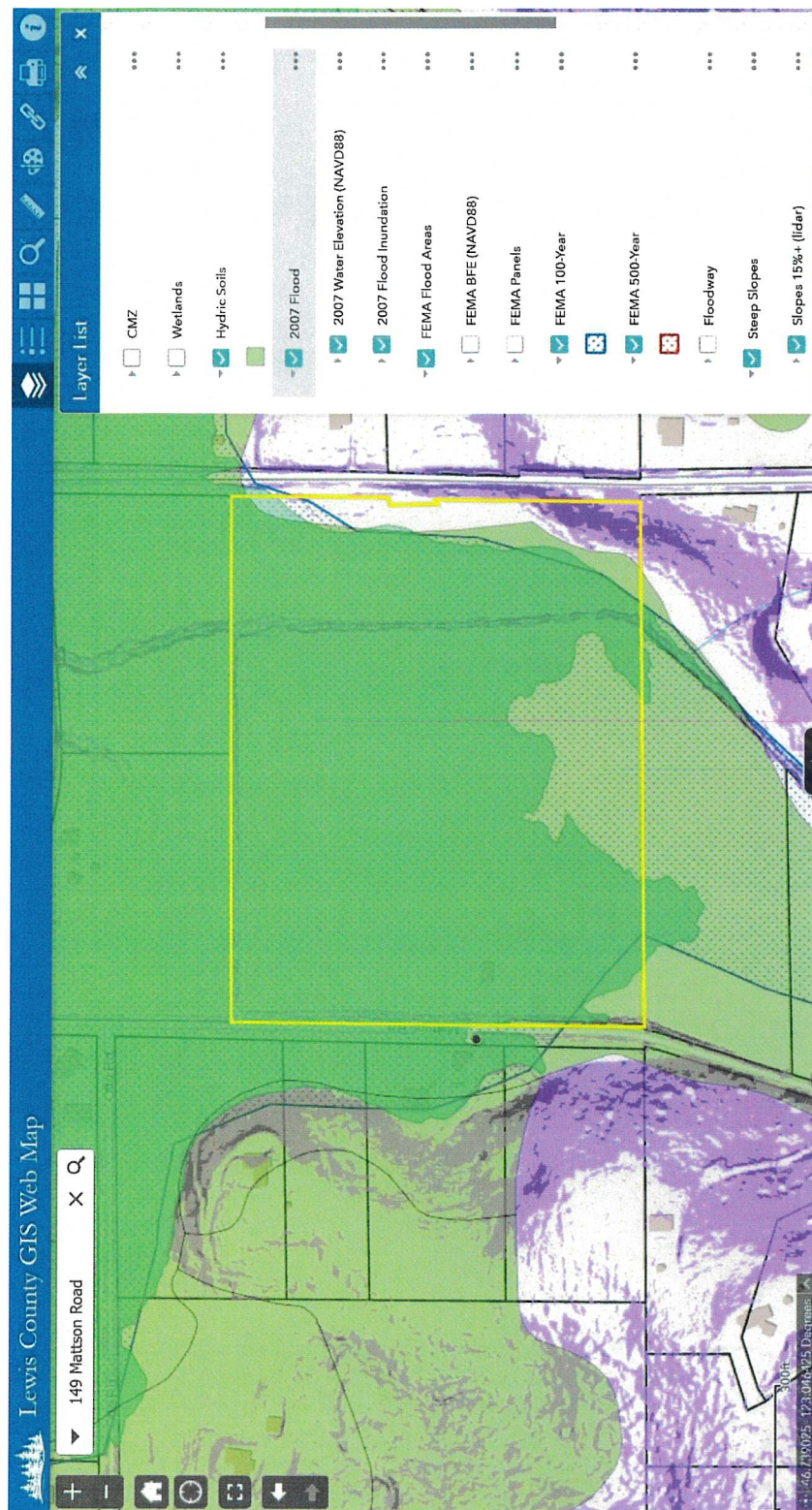
If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202603169)

cc: Zachary Meyer, SEA
Derek Rockett, SWM

Attachment 3: Lewis County GIS map showing the subject parcel and surrounding mapped Critical Areas: Hydric Soils, Flood and Steep Slope areas



Reference 1 - NRCS soil map page 9 of Custom Soil Resource Report for Lewis County Area, Washington Mattson Rd Development and corresponding Map Unit Descriptions as outlined in the Geotechnical Report dated October 13, 2025. Note: 27—Buckpeak silt loam, 30 to 65 percent slopes in proposed Lot 6.

