



Community Development

125 NW Chehalis Ave
Chehalis WA 98532

September 1, 2026

TCI Group, LLC (sent electronically)
PO Box 546
Queen Creek, AZ 85142
tcigroupllc23@gmail.com

RE: Type I Application – LLS26-0001 / SEP26-0017 — Large Lot Subdivision (6 lots); Request for Additional Information and Response to Comments; SEPA DNS Withdrawn
Parcel number: 023883000000

Dear Applicant and Project Consultants:

Lewis County has conducted review of the application materials, agency comments, technical reports, and public comments received during the Notice of Application and State Environmental Policy Act (SEPA) comment period, and other information received following issuance of the August 4, 2026 Determination of Nonsignificance (DNS) for the proposed six-lot large lot subdivision (LLS26-0001) located at 149 Mattson Road, Centralia, Lewis County.

The SEPA comments raise several site-specific issues that require additional information or clarification before the County can complete its review of the subdivision and reconsider the SEPA threshold determination. The original DNS threshold determination has been **WITHDRAWN** as of August 25, 2026. The withdrawal allows the County to obtain and evaluate additional information and clarification necessary to adequately review the current six-lot proposal before making a new SEPA threshold determination.

This letter identifies information presently known to be necessary for continued County review. **This request is not intended to be exhaustive.** Additional information, revisions, technical analysis, or mitigation may be required based upon review of the materials submitted in response to this letter, including the County's forthcoming independent third-party review and field investigation of the wetland/critical areas report.

Once the requested information and analysis have been provided, the County will review and evaluate the additional information and clarifying documents before resuming SEPA threshold review. Any subsequent threshold determination will be subject to applicable notice, comment, and appeal requirements.

Enclosed are the agency, departmental, Tribal, and public comments received during review of the Notice of Application and SEPA threshold determination. The comments have been combined into one document for your review and response. **Your project clock timeline will pause until the items below have been completed, uploaded to your SmartGov portal, and verified as complete.**

Once verified, the application may move forward to the next steps of SEPA and project review. Please submit a coordinated response addressing the following items identified below.

1. Wetlands, Eagle Creek and other critical areas

The Washington State Department of Ecology identified a material deficiency in the submitted wetland/critical areas report. Ecology found that the report does not address historic aerial imagery showing onsite inundation, which Ecology identifies as a primary indicator of wetland hydrology, and stated that this condition occurs near test locations but was not addressed or noted on the wetland data forms. The County has transmitted the submitted wetland/critical areas materials to an independent On-Call qualified consultant for additional technical review and site investigation. Pursuant to the adopted fee schedule, the independent On-Call Critical Area Review (Peer Review / 3rd Party Review) is billed to the applicant at actual cost of the On-Call Consultant's review. The adopted fee schedule found here: [https://lewiscountywa.gov/media/documents/Exhibit A - 2026 Fee Schedule Final Version.pdf](https://lewiscountywa.gov/media/documents/Exhibit_A_-_2026_Fee_Schedule_Final_Version.pdf)

Lewis County contracts with an Independent On-Call consultant, who shall provide a detailed invoice to the County. The invoice shall be provided as documentation of the fees charged to the applicant for Independent On-Call review. The typical cost range of On-Call Consultant review is: \$3,400.00 to \$3,800.00 per project site, however, additional work by the on-call consultant may increase the cost of the review. **The applicant will be charged a \$3,400 fee that shall be paid prior to the Independent On-Call consultant beginning their review. Additional work by the on-call consultant may increase the cost of the review and shall be billed at the close of On-Call Consultant's review. If the On-Call Consultant's review costs less than \$3,400, the applicant shall be refunded the difference. Failure by the applicant to pay the \$3,400 Independent On-Call Consultant fee shall be considered a voluntary withdrawal of permit LLS26-0001 and SEPA26-0017 with no associated fee refunds. Please log into your SmartGov account for LLS26-0001 to pay the On-Call Consultant's preliminary charge of \$3,400 on or before September 15, 2026, or the lack of payment will be processed as your voluntary withdrawal of the project (file numbers: LLS26-0001 and SEP26-0017).**

Following the On-Call Consultant on-site and document review, the County will issue the technical comments, require further field investigation, and/or require additional revisions to the original critical areas report. Accordingly, the wetland and critical-area items in this letter are not the final or exhaustive list of required corrections.

2. Updated geotechnical/geologic-hazard analysis

The October 2025 geotechnical report presently in the project record does not clearly evaluate the same development scope as the current LLS26-0001 proposal.

The report was prepared in connection with construction of two single-family residences on an adjacent parcel and identified no specific buildings on the 28.7-acre subdivision parcel at that time. Comments received during SEPA review also identify mapped or reported conditions on the subdivision parcel including liquefaction susceptibility, Site Class D–E conditions, peat sediments, the Lincoln Creek Fault and steep-slope areas that were not fully characterized for the present six-lot buildout.

Please submit a **project-specific geotechnical report or supplemental geotechnical analysis expressly addressing the current six-lot subdivision lot layout on Parcel Number 023883000000.**

The report shall, as applicable:

- identify and evaluate mapped or field-verified geologic hazards affecting the subdivision parcel;
- address liquefaction susceptibility;
- address seismic/site-class conditions;
- address fault-related conditions identified in the existing report;
- address peat, soft or compressible soils where present;
- identify and evaluate applicable steep-slope or erosion-hazard areas, including the steep-slope soil mapping identified in the record;
- consider reasonably foreseeable residential construction, access/driveways, grading, septic systems, wells and drainage improvements on the six proposed lots;
- identify development limitations, setbacks, additional investigation requirements and mitigation measures;
- demonstrate whether each proposed lot contains a feasible development area after accounting for identified geologic hazards and applicable critical-area requirements; and
- clearly state whether the consultant's conclusions apply to **all six proposed lots under the current subdivision configuration.**

A general statement that the conclusions of the prior report remain applicable will not be sufficient unless supported by analysis demonstrating that the prior investigation adequately covers the current proposal and the geologic conditions affecting the subdivision parcel.

3. Flood hazards, seasonal inundation and drainage

The project record contains mapped Zone A 100-year floodplain and County 2007 flood-inundation information affecting or adjacent to portions of proposed Lots 1 through 6. Environmental Health has determined that proposed locations for wells and/or sanitary control areas may be located within or near these mapped flood-hazard areas.

The record also contains multiple firsthand reports of recurring seasonal flooding, standing water, saturation and ponding on or immediately adjacent to the project site. For example, adjoining property owners reported observing flooding on portions of the proposed development during winter conditions and saturation or ponding during substantial portions of the rainy season

Please provide sufficient site-specific information for the County to evaluate flood and drainage conditions associated with the six-lot proposal, including:

- applicable FEMA Special Flood Hazard Area boundaries;
- County 2007 flood-inundation information;
- surveyed elevations or other technically reliable flood information where needed to establish the relationship of proposed development to flood hazards;
- seasonal high-water and known inundation information relevant to the site;
- the relationship of flood-hazard areas to proposed building/development areas, access, wells and sanitary control areas, septic primary and reserve areas, wetlands and buffers;
- anticipated grading and fill;

- evaluation of proposed access in relation to the 100-year flood elevation and identification of any applicable flood-access requirements or necessary mitigation;
- anticipated changes to drainage or impervious surfaces; and
- measures necessary to avoid, minimize or mitigate adverse flood or drainage effects.

Development proposed within a Special Flood Hazard Area will be subject to applicable floodplain-development requirements. Stormwater associated with subsequent development shall comply with applicable requirements of LCC Chapter 15.45.

The technical analysis prepared for wetlands, flood hazards, geotechnical conditions and drainage should use consistent base mapping and should be reconciled where the subject areas overlap.

4. Revised SEPA Environmental Checklist and complete project description

The SEPA Environmental Checklist must be revised as necessary to accurately evaluate the **current six-lot subdivision proposal and the reasonably foreseeable development associated with creation of six residential lots**, rather than limiting the environmental description to activities occurring at the time the plat is recorded.

The Cowlitz Indian Tribe specifically identified the response to Checklist Question 1(e) as incomplete because the existing response does not account for reasonably foreseeable ground disturbance associated with residential development, including wells, on-site sewage systems, driveways/access, utility installation, grading, filling and related site preparation. Please provide:

- a revised response to Question 1(e) describing the anticipated nature and approximate extent of excavation, grading, filling and other ground disturbance reasonably associated with development of the six lots;
- revised checklist responses wherever the existing answers rely upon a materially different or more limited project description;
- a description of anticipated wells, septic systems, access/driveways, utilities, grading, impervious surfaces and drainage improvements to the extent reasonably known at this stage; and
- cross-references to the updated technical reports and revised preliminary plat submitted in response to this letter.

The revised checklist and technical materials should provide information reasonably sufficient for the County to identify and evaluate probable environmental impacts of the subdivision and reasonably foreseeable development.

5. Potable water availability and groundwater supply

Lewis County Public Health & Social Services, Environmental Health Division, has completed a preliminary review of potable water availability for the proposed six-lot subdivision. Because no public water system is available to serve the project, each proposed lot would necessarily depend on drilled wells. Based on the information presently available, Environmental Health **cannot yet determine that an adequate and reliable potable water supply can reasonably be developed for each proposed lot in accordance with LCC 16.12.480(1).**

Environmental Health reviewed 26 well records from the surrounding area. Ten of those wells could be verified as within approximately 0.25 miles of the project site. Seven of the ten mapped wells reported production yields below 5 gallons per minute at the time of drilling, including five reporting 2 gallons per minute or less. These include some deeper wells (220, 240, 335, and 420 feet-deep) reporting yields of approximately 1 to 2 gallons per minute, suggesting that increased depths do not necessarily increase yield in the project vicinity.

The reported yields represent approximate groundwater conditions when the wells were constructed (ranging from 1987 to present) and do not necessarily represent current, sustained, or seasonal production. The records do not demonstrate that groundwater is unavailable, but the number and proximity of low-yield wells suggest variably low yields and create uncertainty regarding whether six individual domestic wells can reliably meet the potable-water requirements of LCC 16.12.480(1)(a), particularly during seasonal low-groundwater conditions.

The applicant shall submit a **water-source study prepared by a qualified professional**. At a minimum, the study shall address:

- Characterization of the aquifer or water-bearing formation anticipated to serve the proposed lots;
- Expected well depths and anticipated yields;
- Seasonal groundwater availability and potential seasonal changes in well production;
- Available information concerning nearby low-producing or failed wells;
- The feasibility of developing six individual groundwater supplies without creating unacceptable well interference;
- The ability of each proposed source to provide a safe, adequate, and reliable potable-water supply; and

The study shall also identify any measures that may be necessary to ensure a reliable potable-water supply where well production may be limited, such as additional pump testing, water level monitoring, appropriately sized atmospheric storage, assessment of potentially available alternative/contingency sources, and/or any water-use limitation recommendations.

Environmental Health - Water may require one or more test wells, pump testing, water quality tests, or additional hydrogeologic evaluation after reviewing the study. Before final subdivision approval, the applicant must demonstrate that adequate potable water can be provided to each proposed lot consistent with applicable County requirements.

The revised preliminary plat shall clearly show all proposed well locations, 100-foot sanitary control/protection areas, and applicable mapped or determined flood-hazard, stream buffer, and wetland boundaries. Where necessary to determine whether a proposed well or protection area is subject to flooding, the applicant shall provide surveyed elevations or other reliable flood-hazard information.

Wells and associated sanitary control/protection areas should be located outside flood-hazard areas where a feasible alternative exists. Any well proposed within an area subject to flooding must demonstrate compliance with WAC 173-160-171 and WAC 173-160-291.

The three Conditions of Development identified in Environmental Health's August 17, 2026, Preliminary Water Review Memorandum shall also be incorporated into the revised project materials and placed on the face of the final plat as required by Environmental Health.

6. On-site sewage disposal and demonstration of usable development area

Environmental Health - Onsite has clarified that soil evaluation holes were reviewed on **all six proposed lots**. After elevated water levels in the test holes receded, Environmental Health observed a minimum of 12 inches of natural, undisturbed soil without mottling at each evaluated site and determined that the soil criterion for placement of an on-site sewage system was met. Accordingly, the County is **not requiring a new soil evaluation at this time solely on the basis of public comments**.

However, individual on-site sewage permits remain required, and the preliminary subdivision materials must demonstrate that each proposed lot can physically accommodate the reasonably necessary development components in compliance with applicable requirements and outside of critical areas and buffers. Please revise the preliminary plat/site plan to identify, as applicable:

- proposed primary septic areas;
- reserve septic areas;
- proposed wells and 100-foot sanitary control/protection areas;
- wetlands and wetland buffers;
- Eagle Creek and its applicable buffer;
- flood-hazard areas;
- proposed development/building areas;
- access and driveway areas; and
- other site constraints affecting usable development area.

These features shall be shown in a manner that allows Environmental Health and Community Development to evaluate whether each lot contains adequate usable area for the proposed residential use.

Future Informational Note: The applicant will be required to obtain individual on-site sewage permits and retain an appropriately qualified septic designer as required for future development.

7. Preliminary plat, lot-area and zoning information

Public comments and the subsequently filed appeal identify potential inconsistencies between the preliminary plat, the stated lot areas and the RDD-5/RDD-20 zoning affecting the property. The comments cite the preliminary drawing as showing net lot areas below five acres for several proposed lots and question how the zoning boundary affects the required lot configuration.

The County has not adopted the commenters' interpretation as a final zoning determination through this letter. The matter must, however, be resolved through the preliminary land-division review. Please provide a revised preliminary plat and supporting survey information clearly showing:

- gross area of each proposed lot;
- net area of each proposed lot, where applicable;
- existing and proposed rights-of-way/easements and any areas excluded from lot-area calculations;

- the RDD-5/RDD-20 zoning district boundary;
- the acreage of each proposed lot located within each applicable zoning district, where a lot is divided by the district boundary; and
- sufficient information for the County to determine compliance with applicable density, minimum lot-area and dimensional requirements.

If revision of the subdivision configuration is necessary to comply with applicable zoning or subdivision requirements, submit revised project plans and update all associated environmental and technical documents accordingly.

8. Cultural resources

The Cowlitz Indian Tribe Cultural Resources Department reviewed SEP26-0017 and identified deficiencies in the SEPA checklist's treatment of cultural resources as previously noted in this letter.

At this time, the Tribe has requested a **professional cultural-resources survey** and stated that adequate evaluation of Checklist Question 13 requires historic research, Tribal consultation, data gathering and professional field investigation. Please provide:

- a professional cultural-resources survey prepared by an appropriately qualified cultural-resources professional;
- revised responses to SEPA Checklist Question 13 based upon that investigation;
- revisions to other SEPA checklist answers as warranted by the survey findings;
- submission of the complete draft survey through the County for appropriate Tribal and agency review before it is finalized; and
- responses to comments received through that review process.

The Cowlitz Indian Tribe requested that complete draft survey reports be provided to its Cultural Resources Department for review and comment. The Tribe also recommended use of its Unanticipated Discovery Protocol for subsequent ground-disturbing activities.

The County anticipates incorporating an approved Unanticipated Discovery Protocol into applicable project approvals and/or subsequent ground-disturbing permits. The Tribe's submitted protocol provides procedures for stopping work and notifying appropriate parties if archaeological materials or human remains are encountered.

Any archaeological site-location or other culturally sensitive information subject to restricted disclosure should be transmitted in an appropriate confidential manner rather than included in publicly posted application materials.

9. Other agency and departmental comments

The revised application materials shall also address the following as applicable:

- Any new road approach, or modification of an existing approach, will require an applicable Road Approach Permit.
- Development occurring within the Special Flood Hazard Area will require applicable floodplain-development review/permits.
- Future on-site sewage systems require individual permits and design consistent with Environmental Health requirements.

- Stormwater shall comply with applicable requirements of LCC Chapter 15.45.
- Ecology states that grading and filling shall use clean fill and that other material may require separate solid-waste review or authorization.

These items do not replace any additional permit, review or authorization required by Lewis County or another agency.

10. Coordinated resubmittal and response matrix

To facilitate review, please submit the requested materials as **one coordinated resubmittal package** to the extent practicable. Please include a written response matrix that identifies the applicant or project consultant responsible for each response and:

1. reproduces each numbered section and sub-item of this letter;
2. identifies the applicant's response;
3. identifies the document, report, plan sheet and page number where the response is addressed;
4. clearly identifies any item the applicant believes is not applicable and explains the basis for that conclusion; and
5. provides a response to each applicable agency, departmental, Tribal, and public comment enclosed with this letter, identifying where each issue is addressed in the resubmittal.

All revised technical reports shall clearly identify their date and revision status. Revised plans and technical reports must be internally consistent. Where wetland, geotechnical, flood, water, septic or other technical analyses rely on mapping of common site features, those features should be reconciled and shown consistently.

Administrative Record and Superseded Materials

All materials submitted in response to this request will become part of the County's Administrative Record (project and SEPA). Revised reports and plans shall clearly identify the document date and revision date and shall identify the document, report, plan, or drawing being supplemented or superseded. Unless specifically authorized by the County, revised materials shall not remove or replace previously submitted materials from the project record. Where a prior conclusion has changed, the revised document shall clearly identify the change and the technical basis for the revised conclusion.

Continued SEPA review

According to Lewis County Code (LCC) 17.05.070(7), the determination of procedural completeness does not preclude the review authority from requesting additional information or studies either at the time of the notice of procedural completeness or afterward if new information becomes required or if there are changes in the proposed project.

Upon receipt of the requested information (coordinated resubmittal packet), the County will review the resubmittal and circulate revised materials to appropriate reviewing departments, consultants and agencies. The County may identify additional information or review requirements after evaluating the resubmittal.

The County's On-Call Critical Area Review Consultant will conduct review and site investigation. **Additional wetland or critical-area requirements may therefore be issued after the applicant's initial response to this letter.**

Once sufficient information has been obtained and outstanding issues have been evaluated, Lewis County will resume SEPA threshold review and issue a new threshold determination as appropriate. Any new threshold determination will be subject to the notice, comment and appeal procedures applicable at that time.

Nothing in this letter constitutes a determination that the proposal will or will not be approved, that a particular SEPA threshold determination will ultimately be issued, or that identified environmental impacts cannot be adequately mitigated. The purpose of this request is to obtain information reasonably sufficient for Lewis County to complete its environmental and land-use review of the current proposal.

However, if the applicant does not submit the required information within 90 days from the date of this letter, the Large Lot Subdivision and SEPA applications shall automatically lapse. Lapsed applications will not be further processed. Lapsed applications may be resubmitted with the additional materials as a new application with the submittal of full fees. Resubmittal of lapsed applications shall be governed by the regulations in effect at the time of the resubmittal. Lapsed application fees are not refundable.

Please contact me if you or your consultants have questions regarding the requested information or would like to schedule a coordination meeting with County reviewing staff before preparing the resubmittal.

Sincerely,

Karen Witherspoon

Karen Witherspoon, AICP
Senior Project Planner
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CC: Butler Surveying, Inc. (sent electronically)
RB Engineering (sent electronically)
Environmental Design, LLC (sent electronically)
Northern Resource Consulting, Inc. (sent 1st class mail)
Jolma Design LLC (sent electronically)
Ecology – Zach Meyer (sent electronically)
Parties that provided comments (sent 1st class mail)

Enclosure: All NOA & SEPA Comments Document