Appendix A

Comments Received on the Draft EIS

Appendix A – Comments Received on the Draft EIS

Comment Letters

Appendix A of the Final EIS contains copies of all comment letters received on the Draft EIS. This introduction explains the organization of comments and responses and describes how to locate a response to an individual comment. Comment letters/emails were initially organized by date received, and by the type of entity providing the comments, in the following order:

- Government agencies/tribal governments
- Organizations
- Individuals
- Draft EIS public meeting comments

Each comment letter/email received was given an identifying number, and each individual comment within that letter was numbered sequentially (e.g., 1-1). Similarly, using a verbatim transcript of the meeting, each speaker at the virtual public meeting and each individual comment by that speaker was assigned an identifying number (e.g., T1-1).

Appendix A also contains several exhibits (in table format) that enable a reader to find their letter, an individual comment, and the issue category/sub-category number in Chapter 3 of the Final EIS that provides a response to the comment. The exhibits, organized by the entity type as shown above, list each comment letter received; the number and the general topic/issue of each comment within that letter (e.g., 1-1, which corresponds to Letter No. 1, comment No. 1); and typically a 2- or 3-digit numerical identifier for the response category (e.g., 3.5.1) that responds to that particular comment, with the full response included in the Final EIS (generally in Chapter 3). Responses are generally organized by SEPA element of the environment (e.g., Earth), and by groups of related response comments. Within each element of the environment, comments are briefly summarized followed by a response; responses may be further divided into sub-categories (e.g., geologic hazards). If a response contains supplemental or updated technical information, or corrects an error in the Draft EIS, this is identified in context.

Table of Exhibits

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Exhibit A-4 Comments from May 20, 2020 Public Hearing A-27

Exhibit A-1 Comments from Agencies and Tribes (Letters 1–9)

Letter #	Commenter	Issues	See Final EIS Section
1	**Washington Department of Ecology (Ecology)**	1. Input to wetlands	3.5.2(2), 3.4.3(1)
		2. Use of dispersion trenches in wetland buffers	3.4.4(1)
		3. Swales in parking lots	3.4.4(1)
		4. WQ monitoring of stormwater wetlands	3.4.4(1)
		5. Roof runoff	3.4.4(1), 3.5.2(1)
		6. Buffer averaging	3.5.2(1), 3.4.3(1)
		7. Affected environment	3.6.1
		8. Areas of concern	3.6.2
		9. Feasibility study/ cleanup alternatives	3.6.1
		10. Protective measures during construction	3.6.1, 3.6.5
		11. Worker exposure	3.6.5
		12. Water quality	3.4.4(1)
		13. Water rights	3.14
2	**Washington Department of Archaeology and Historic Preservation (DAHP)**	1.Consult with tribe on TCP	3.10.4
		2. Agree with the historic district eligibility; include Japanese settlement	3.10.1
		3. Incorporate rehab of buildings and sites	3.10.1
		4. Tax credits available	3.10.1
		5. Avoid impacts to historic district	3.10.1
		6. Develop interpretive plan for Japanese settlements	3.10.3(1)
		7. More investigation of Japanese settlements	3.10.3(2)
		8. Additional survey in Planning Areas (PA) 2 & 3	3.10.2
		9. Recommendations for documentation	3.1.3
3	**Snoqualmie Tribe**[1]	1. Overview of concerns	See responses to 3-2 through 3-91 (below)
		2. Significance of Falls/TCP	3.10.4
		3. Impacts to Salish Lodge	3.11.17
		4. Summary of SEPA	3.1
		5. Alternatives similar	3.1.2(1)
		6. No information for PA 2 & 3	3.1.2(2)
		7. Insufficient infrastructure	3.11.12, 3.11.13
		8. Population & housing	3.7, 3.8.1

[1] Letter No. 44 (Matthew Baerwalde), requesting an extension of the comment period, was inadvertently categorized as from an Individual rather than from a Government Agency/Tribe. Apologies for the mistake.

Letter #	Commenter	Issues	See Final EIS Section
		9. Alternative to maximize environmental benefits/ move Mill Pond Road farther from river	2.4, 3.4.2(3)
		10. How will owner enforce COVID-19 restrictions	3.1.3(4)
		11. Earth - seismic impacts	3.2.5
		Air	
		12. Air quality/CO-construction	3.3
		13. Greenhouse Gases (GHG)	3.3
		14. Asbestos	3.6.1
		15. Green building technology	3.1.2(2), 3.1.2(5)
		16. Data questions	3.11.4
		Water Resources	
		17. Water resources/Snoqualmie River	3.4.2(1)(3)
		18. Direct discharge	3.4.1(1), 3.4.2(2)
		19. Borst Lake	3.4.3(2)
		20. Temperature TMDL	3.5.1(2), 3.4.2(2)
		21. Water quality sampling	3.4.2(1)(3), 3.5.1(2)
		22. Consider alternatives to direct discharge	3.4.2(2), 3.4.4(1), 3.5.1(2)
		23. Evapotranspiration	3.2.1, 3.5.2(2)
		24. Move Mill Pond Road farther	3.4.2(3) and 3.5.1(1)
		25. Dogs/RVs near river	3.5.1(2)
		26. Temperature TMDL	3.2.1(2), 3.4.2(2), 3.5.1(2)
		27. Grading, use natural flood controls	3.4.1(1)(2)
		28. Stormwater planning, erosion	3.4.1(1)(2)
		29. Reexamine groundwater recharge	3.2.1, 3.4.1(1)
		30. Consider alternative to improve flood storage	3.4.1(2)
		31. Maintain flows to wetlands and streams	3.5.2(2)
		32. Questions significant unavoidable adverse impacts- depends on future phases; any temperature impacts are significant.	3.4.2(1)(2)(3), 3.5.1(2)
		33. TMDL	3.4.2(2), 3.5.1(2)
		Plants & Animals	
		34. Human impacts to wildlife	3.5.3(1)
		35. Inaccurate description of vegetation along river bank	3.5.1(1)
		36. Statement of poor water quality in stream not demonstrated	3.4.2(1), 3.5.1(2)
		37. Alternative location of Mill Pond Road	3.4.2(3) and 3.5.1(1)
		38. Wetland hydrology	3.4.3(1), 3.5.2(2)
		39. Human impact to wildlife	3.5.3(1)
		40. Disturbance of elk	3.5.3(1)

Letter #	Commenter	Issues	See Final EIS Section
		41. Construction impacts to wildlife	3.5.3(1)
		42. Channel migration	3.2.4
		43. Assumptions about impervious area uncertain	3.4.3(3)
		44. Increase setback from river near PA 1	3.4.2(1)(3), 3.5.1(1)
		45. Bigger setback to enhance hyporheic zone	3.4.2(1)(3), 3.5.1(1)
		46. More analysis of wetland hydrology	3.4.3(1)
		47. Temperature TMDL	3.4.2(3), 3.5.1(2)
		48. Displacement of elk	3.5.3(c)
		49. Minim 165-ft buffer from river	3.4.2(1)(3), 3.5.1(1), 3.5.3(1)
		50. More information on wildlife underpass needed	3.4.2(3), 3.5.3(1)
		51. Wildlife corridor will not reduce impacts of a mixed-use employment center	3.5.3(1)
		52. No Action Alternative would not impact wildlife	3.5.3(1)
		53. Include alternative that increases setback from river	3.4.2(3), 3.5.1(1), 3.8.1, 3.8.5
		54. More detail for wildlife corridor needed	3.5.3(1), 3.8.1
		55. Environmental health	3.6.1, 3.6.2
		Land Use/Plans & Policies	
		56. More intensive land use	3.8.5, 3.9
		57. PA 2 & 3 too vague to evaluate highest impact scenario. Outdoor concert venue should be considered worst case.	3.1.2(2), 3.1.2(4), 3.8.5, 3.9
		58. Plan would not provide opportunities for environmental enhancement	3.4.2(1)(3), 3.8.1, 3.8.5, 3.9
		59. Open space may be overestimated since no firm plans for PA 2 & 3	3.1.2(2), 3.8.1, 3.10.4
		60. Bigger setback from river	3.8.1
		61. Unpermitted fill – Comprehensive Plan requires to be removed; may affect baseline for flood calculations	3.8.5
		Housing	
		62. No affordable housing; average household size inconsistent with Census	3.8.1, 3.8.5
		63. No low-income housing	3.8.1
		Aesthetics	
		64. 55-ft building too high; not consistent with surrounding landscape character	3.9
		65. More view studies needed	3.9
		66. Visual impacts in different seasons	3.9
		Cultural Resources	
		67. Cultural resources report not complete	3.10.1, 3.10.2, 3.10.4
		68. Limited info and errors re: Tribe	3.10.4

Letter #	Commenter	Issues	See Final EIS Section
		69. Old/incomplete information used	3.10.4
		Transportation	
		70. No mitigation of alternatives to address traffic	3.11.5, 3.11.10
		71. Construction impacts – dust control	3.11.8
		72. Transportation system inadequate; total traffic unclear since PA 2 & 3 not specific	3.11.13
		73. Burden of improvements will fall to City, King County, Tribe. Improvements should be built before development occurs	3.11.12
		74. SR 202 bridge replacement could damage environmental resources and should be analyzed	3.11.2
		75. Need for construction management plan	3.11.8
		76. Event space traffic	3.11.16
		77. Outdoor performance space will cause impacts	3.11.16
		78. Peak hour wait times at intersections will be substantial and frustrating	3.11.2, 3.11.13
		79. Assumed increases in transit service are speculative	3.11.10
		80. Traffic impacts to Snoqualmie Falls/Salish Lodge and TCP	3.11.17
		Parks	
		81. Question about Riverwalk; questions about park needs; additional impacts	3.1.3
		Public Services	
		82. Police Dept. info/impacts not accurate	3.13
		83. Fire Dept. info outdated; schools are over capacity; impacts of COVID-19 on hospitals	3.13.2
		84. Insufficient information on water supply	3.14
		Fiscal Impacts	
		85. Various statements about economies of scale, need for staff; socioeconomic effects of increased traffic, pollution not evaluated.	3.15
		86. Does not analyze (indirect) costs to Tribe	3.11.17, 3.15.6
		Master Drainage Plan (MDP)	
		87. Direct discharge	3.4.3
		88. Asserts departure from KCSWDM re: hydrology	3.4.3
		89. Questions infeasibility of infiltration	3.2.1(1), 3.3.3
		90. Flood storage	3.4.1
		91. Does not address how Comprehensive Plan requirement to remove unpermitted fill will be complied with	3.8.1(h)
4	**Tulalip Tribes**	1. Insufficient alternatives	3.1.2(1)
		2. Mitigation	3.1.2(2)

Letter #	Commenter	Issues	See Final EIS Section
		3. PA 2 & 3 impacts	3.1.2(2)
		4. Additional study needed	3.1.2(4)
		5. Improve environmental conditions	3.2.1, 3.4.2(3), 3.5.1(1)
		6. Flooding	3.4.1(2)
		7. Unpermitted fill	3.8.1(h)
5	**King County Historic Preservation Program**	1. Concurs with finding of significance	3.10.1
		2. Additional mitigation for Japanese community site	3.10.3
		3. Historic district	3.10.1
		4. PA 1 - monitoring required; additional test pits	3.10.3
6	**King County Dept. of Natural Resources (DNR) and Parks and Recreation Division**	1. Access to Snoqualmie Valley Trail (SVT) needed	3.4.2(3), 3.13.2
		2. Impacts to rural trail from urban land use	3.13.2
		3. Increased use of King County trails	3.13.2
		4. Fence southern boundary	3.4.2(3), 3.13.2
		5. Status of SVT Pre-Annexation Agreement access easement	3.4.2(3), 3.13.2
7	**King County Dept. of Local Services**	1. No analysis of consistency with 2002 Interlocal Agreement (ILA)	3.8.3
		2. Water supply – overcommitted allocating need for water rights	3.14
		3. Noise from outdoor performance space	3.12
		4. Notice to rural residents per ILA	
		5. Channel migration	3.4.1(1)
		6. Floodway analysis	3.4.1(1)
		7. Revisions to flood maps (process)	3.4.1(1)
		8. ILA provisions regarding flooding	3.4.1(1)
		9. Drainage outfall through Mill Pond revetment	3.4.1(1)
		10. Basic treatment may not protect salmon downstream	3.1.2(1), 3.4.4(1)
		11. No support for statement that stormwater quality will improve	3.4.2(1)(3)
		12. Identify liquefaction areas	3.2.5
		13. Lift station engineering	
		14. Use of toxic chemicals-treated logs, creosote	3.6.2, 3.6.7
		15. How much soil in PA 2 & 3 needs remediation?	3.6.6
		16. Coordinate traffic management for events with King County	3.11.9
8	**Snoqualmie Valley Watershed**	1. Concerns about any change in flow regime of river, reduction in imperious surface from development, and loss of site as flood storage	3.2.1, 3.4.1(1)

Letter #	Commenter	Issues	See Final EIS Section
	Improvement District (WID)	2. Compare Proposal to historical conditions/ unpermitted fill	3.4.1(1)
9	**Snoqualmie Watershed Forum**	1. Impervious surfaces, water temperature	3.1.1, 3.2.1, 3.4.2(1)(2)(3), 3.4.4(1), 3.5.1(2)
		2. New impervious surfaces	3.4.4(1)
		3. Greater protection of riparian health	3.4.2(1)(3), 3.5.1(1)
		4. Revised rule re: Waters of US/ Jurisdiction	3.4.2(3), 3.5.2(3)
		5. Buffer impacts	3.4.2(1)(3), 3.5.2(1)
		6. Impacts to Critical Aquifer Recharge Areas (CARA)	3.2.1
		7. Water supply deficient/scale back project	3.14
		8. Minimize development and channel migration zone (CMZ)	3.2.4
		9. Bull trout	3.5.2(1), 3.5.4(1)
		10. More detail for alternatives	3.1.2(1)(4)

Exhibit A-2 Comments from Organizations (Letters 10–17)

Letter #	Commenter	Issues	See Final EIS Section
10	**Dana Hubanks, Snoqualmie Community Action Network (SCAN)**	1. Request extension of comment period due to pandemic	3.1.1
		2. Complaints about past public records requests	3.1.3(4)
		3. City violated 180-day limit for EIS preparation	3.1.2(3)
		4. Needs time to raise money to hire experts	3.1.3(4)
11	**Cristie Coffing, SCAN**	(13 comments + 3 attachments: JACL resolution, DN Traffic Study, Cost of Growth Study)	
		1. 3-minute speaking limit at public meeting violated SEPA rules	3.1.1(2)
		2. City violated 180-day limit for EIS preparation	3.1.2(3)
		3. Incorporates Japanese American Citizens League Resolution of potential significance of Mill site; representative from JACL was not present at an on-site meeting	3.10.3
		4. Trenches/artifacts; question about listing on register	3.10.2, 3.10.3
		5. Manage archaeological sites separately from historic industrial resources; questions how will be managed	3.10.3
		6. Where is trench No. 5?	3.10.3(1)
		7. No consultation with JACL & Japanese Cultural & Community Center of WA; summarizes their concerns	3.10.3
		8. Light pollution from industrial uses and concert venue not addressed adequately	3.9
		9. Traffic not addressed adequately; references DN Traffic Study	3.11.13
		10. Water supply not adequate	3.14
		11. Climate change not addressed	3.3
		12. Revise project to reflect COVID 19, loss of retail, limits on gathering, decrease in consumer activity	3.8.5
		13. Growth does not pay for itself	3.15.4
12	**Washington Trust for Historic Preservation**	1. Concurs w/conclusion of eligibility for listing	3.10.1
		2. Recommend that entire site be nominated to National Register as mitigation; and that site's history be interpreted on-site.	3.10.1, 3.10.3
		3.Try to preserve all remaining historic elements in PA 2 & 3	3.10.1, 3.10.3
		4. If impacts to resources in PA 2 & 3 are unavoidable, rehabilitate the most significant historic elements of site	3.10.3
13A	**Karen Yoshitomi, Japanese Cultural & Community Center of WA**	1. Conduct further consultation w/DAHP	3.10.2, 3.10.3
		2. Should be further investigation/full archaeological survey of PA 1	3.10.3

Letter #	Commenter	Issues	See Final EIS Section
13B	**David Inouie, Japanese American Citizens League (JACL)**	1. Additional survey needed	3.10.3
14	**Cynthia Krass, Snoqualmie Valley Preservation Alliance (SVPA)**	1. Flooding-unpermitted fill	3.4.1(1)
		2. Insufficient range of alternatives; range too narrow; no significant differences in impacts; purpose of Proposal not stated; consider removal of all unpermitted fill as an alternative and pre-condition to PCI Plan approval	3.1.2(1), 3.8.5
		3. Analysis of flooding impacts insufficient	3.4.1(1)(2)
		4. Defers too much analysis to later stages; fails to evaluate cumulative effects	3.1.2(2)
		5. Aquifer recharge	3.2.1
		6. Tokul Creek	3.2.2
		7. Water supply	3.14
		8. GMA consistency	3.8.1
		9. Compliance with MTCA	3.6.2
		10. North Wellfield	3.6.3
		11. Analysis to establish case for development in CMZ not included	3.2.4
15	**Dana Hubanks, SCAN**	1. Requests revised Draft EIS. Includes Attachments A-F	3.1.1
		2. Should be withdrawn to provide appropriate analysis	3.1.2(4)
15A	**Attachment A: Bricklin & Neuman**	1. Requests extension of comment period	3.1.1
		2. More analysis/detail needed	3.1.2(4)
		3. Borst Lake impacts not analyzed	3.4.3(2), 3.6.7
		4. Contamination not analyzed adequately	3.6.1
		5. Mitigation discussion not adequate	3.1.2(6)
		6. Defers analysis – inappropriate phased review	3.1.2(2), 3.1.2(4)
		7. Alternatives too similar, not adequate	3.1.2(1), 3.1.2(2)
		8. Inconsistent with Comprehensive Plan policies	3.8.1
		9. Withdraw/reissue Draft EIS	3.1.2.(4)
15B	**Attachment B: Cooke Scientific/Sarah Cooke**	1. Borst Lake omitted	3.6.7
		2. Release of toxins from ground-disturbing activity	3.6.7
		3. Prior violations with Ecology	3.1.3
		4.Wetland delineations are too old	3.5.2(3)
		5. SMP not updated	3.8.1 E
		6. Discharge of wine effluent during flooding	3.4.5
		7. Impacts to on-site wetlands	3.4.3(1), 3.4.3(3)
		8. Recommends conditions of approval	3.4.5

Letter #	Commenter	Issues	See Final EIS Section
15C	**Attachment C: Practical Environmental Solutions/Pam Jenkins**	1. Suspected contaminated areas	3.6.1
		2. Simultaneous construction and remediation	3.6.1, 3.6.5
		3. Groundwater monitoring wells	3.6.1, 3.6.2, 3.6.3
		4. Impact of groundwater on surface water	3.6.1, 3.6.4
		5. Project site groundwater and Borst Lake	3.6.7
		6. Well decommissioning	3.1.3
		7. Ecology's capacity to engage in cleanup	3.6.1
		8. No Action Alternative and remediation	3.6.1
		9. Potential contaminants in PA 1, 2, 3, and railways	3.6.1, 3.6.4
		10. Oil and herbicides	3.6.1, 3.6.4
		11. Potential contamination in ditch sediment	3.6.1, 3.6.4
		12. Planning Area 2 lumber strapping area	3.6.1, 3.6.4
		13. Planning Area 2 transformer T-18 area	3.6.1, 3.6.4
		14. Planning Area 3 UST area	3.6.1, 3.6.4
		15. Planning Area 3 AST area	3.6.1, 3.6.4
		16. Planning Area 3 Morbark area	3.6.1, 3.6.4
		17. Planning Area 3 PCP dip tanks	3.6.12, 3.6.4
		18. Planning Area 3 transformers T-12 and T-17	3.6.1, 3.6.4
		19. Planning Area 3 boiler ash fill area	3.6.1, 3.6.4
		20. Planning Area 3 vehicle wash pad	3.6.1, 3.6.4
		21. Planning Area 3 other areas of concern	3.6.1, 3.6.4
		22. Summary of comments and conclusions	3.1.3
15D	**Attachment D: DN Traffic Consultants/ Gary Norris**	1. Traffic counts	3.11.1
		2. Trip generation	3.11.2
		3. Trip distribution	3.11.3
		4. Traffic forecasting and modeling	3.11.4
		5. Pedestrian/bicycle impacts	3.11.5
		6. Safety impacts	3.11.6
		7. Traffic on bridges	3.11.7
		8. Construction impacts	3.11.8
		9. Regional transportation system	3.11.9
		10. Transit service	3.11.10
		11. Road conditions	3.11.11
		12. Timing & funding of improvements	3.11.12
15E	**Attachment E: Paul Eisenberg**	1. Require assurances for mitigation	3.1.2(6)
		2. Management of obligations, conservation easements, enforcement	3.1.2(6)
		3. Buffer impacts, mitigation	3.5.2(1)

Letter #	Commenter	Issues	See Final EIS Section
		4. Reevaluate land use: retail could change post-pandemic	3.8.5, 3.15.1
		5. More analysis of school impacts	3.1.2(4), 3.13
		6. Traffic: impacts of outdoor performance space; increased use of trails	3.11.16
		7. Earthquake risks - liquefaction, subsidence; mitigate for potential large earthquake	3.1.2(4), 3.2.5
		8. Air quality impacts not mitigated	3.1.3(3), 3.3
		9. Evaluate green energy options; heat from pavement	3.1.2(5)
		10. More detailed analysis of flood events needed to demonstrate that zero rise is possible	3.4.1(1)
		11. Impacts on wildlife not described, no mitigation proposed	3.5.3(1)
		12. Operational impacts not evaluated – police, fire, water, sewer; wastewater issues from wineries, vat cleaning	3.4.5, 3.13. 3.14
		13. More detail on water quality impacts to wetlands	3.5.1(2), 3.5.2(1)(2)
		14. Analyze/mitigate runoff and recharge during flood events	3.1.1
		15. No thorough site evaluation or consultation with Tribe re: cultural resources	3.10.4
		16. More historic information needed	3.10.2
		17. More discussion of impacts/risks of legacy contamination	3.6.1
15F	**Unsigned Attachment**	1. Requests extension of comment period because City has not fulfilled public records requests for documents necessary to understand the Draft EIS	3.1.1(3), 3.1.3(4)
		2.Acknowledges that SCAN comments may be unorganized and duplicative	3.1.3.(4)
		3. Regional urban project will impact rural and resource uses – not consistent with Countywide Planning Policies (CPPs). Impacts not addressed in regional SEPA documents	3.7, 3.8.1, 3.8.2
		4. Use SEPA to fill gaps in code ("SEPA gaps") – inadequate concurrency system; insufficient regulations for flooding, stormwater, groundwater	3.1.3(4), 3.8.4, 3.8.5
		5. Health Dept. noise standards	3.12
		6. Impacts to off-site properties, neighboring jurisdictions and tribes	3.1.2(4), 3.7
		7. Does not consider cumulative impacts	3.7
		8. Draft EIS does not consider all environmental reviews conducted by other agencies on the site	3.1.2(4)
		9. Should analyze impacts of full range of discretionary/flexibility options that are available under the code and could be taken during PCI Plan review	3.1.3(5)

Letter #	Commenter	Issues	See Final EIS Section
		10. Assumes floodplain impacts will be analyzed later; more detailed review needed now	3.4.1(1)
		11. Assumes no air quality/GHG impacts because no adopted standards. GHG emissions should be evaluated apart from City's overall emissions	3.1.3(4), 3.3
		12. Identify environmental and health risks of each chemical present on site and analysis of risk of release	3.6.1
		13. Should not defer characterizing contaminants in PA 2 & 3. No reasonable basis for conclusion of low risk of release, fire or explosion	3.6.1
		14. Evaluate PA 3 steep slopes in detail now so as not to foreclose options	3.2.9
		15. Basic stormwater treatment not sufficient; should be enhanced based on proximity to fish-bearing waters	3.4.4(1)
		16. Police service analysis not sufficient	3.13
		17. Evaluate impacts on City facilities (City hall, public works, police station) in greater detail	3.13
16	**Kathryn Graham, SCAN**	1. Identifies several comments incorporated by reference	3.16
		<u>Environmental Health</u>	
		2. Potential of contamination to spread through groundwater to North Wellfield	3.6.3
		3. Contaminants of concern remaining after Weyerhaeuser cleanups. Monitor earthwork during Phase 1 to evaluate migration of groundwater contamination from PA 2 & 3	3.6.1, 3.6.4
		4. Need plan to protect CARA during construction	3.1.3(3), 3.2.1
		5. Building design - objects to 55-ft height	3.1.3(3), 3.8.4(b), 3.9
		6. Noise – amphitheater noise a public nuisance	3.12
17	**Lacy Linney, SCAN**	1. General statement of various concerns, which are addressed in specific comments.	3.1.3(2)
		2. Development next to river is too risky to allow	3.1.3(3)
		3. City should take some ownership of cleanup	
		4. No access to public transportation	3.11.5, 3.11.10
		5. Water for PA 2 & 3 not addressed	3.14
		6. Potential for sprawl in surrounding areas	3.7
		7. Buildout could take 20 years, not 15	3.8.5
		8. Construction traffic will affect traffic flow	3.11.8
		9. Air quality - project not limiting emissions	3.1.3(3), 3.3
		10. City should require more sustainable features	3.1.3(3)
		<u>Water Quality</u>	
		11. Concerned about additional runoff to river	3.5.1(2)
		12. Should require "full elimination of pollutants" from stormwater	

Letter #	Commenter	Issues	See Final EIS Section
		13. No construction staging in wetlands	3.5.2(1)
		14. Any increase in population is significant	3.7
		15. Buildings too high; will spoil views	3.1.3(3), 3.9
		Traffic	
		16. Downplays indirect impacts	3.11.13
		17. Road improvements should be in place before development occurs	3.1.2(6), 3.11.12
		18. Haul road impacts on wetlands	3.5.2(1(), 3.5.2(2)
		19. Same issue as #17-17	3.1.2(6), 3.11.12
		20. Noise - impact of amphitheater (misquotes statement about Proposal, not amphitheater)	3.12
		21. Water – no water for PA 2 & 3	3.14
		22. Water - disagrees with "dry season"	3.14
		23. Water - disagrees with demand of wine production	3.14
		24. Fill - City should act re: unpermitted fill	3.8.1
		25. Require updating of adopted utility plans	3.14
		26. Development work has occurred; violates Pre-Annex agreement (no develop until PCI Plan approved	3.8.1
		27. Disagrees that housing will be affordable; not a fully contained community, residents will shop in Snoqualmie	3.7
		28. Impact of event space	3.8.5
		29. City should require "net zero" impact from development	3.1.3(3)
		30. No way to access site without impacting critical areas	3.5.3(2)
		31. SR 202 bridge replacement unfunded	3.11.7
		32. City should push sustainability much harder	3.1.3(3)
		33. Disagrees that development will increase tourism	3.1.3(3)
		34. Winemaking process is wasteful and involves chemicals	3.1.3(3)
		35. Consider impacts to sensitive receptors (river, wetlands)	3.5.3(2)
		36. Cleanup plan needed before PA 1 develops	3.6.1
		37. Cleanup or fully scoped plan before any development	3.6.1
		38. Is fenced area temporary?	
		39. Site cleanup	3.6.1
		40. Cleanup should not be "congruently"	3.6.1
		41. Winemaking is too close to the river; risk of accidental release	3.1.3(3), 3.4.5

Letter #	Commenter	Issues	See Final EIS Section
		42. Misquotes/conflates impacts of haul road and impacts of PA 1	3.1.3(3)
		43. Understates risk of impacts to water resources from winemaking	3.5.1(2)
		44. Risk of spills from accidents not mitigated since required road improvements not approved	3.1.3(3), 3.11.12
		45. Disagrees with stated benefit of redevelopment	3.1.3(3)
		46. Project would be very visible from every direction	3.9
		47. Outdoor performance space will impact traffic and noise	3.1.3(1), 3.12
		48. Should not approve anything before Ecology approves SMP	3.1.3(2)

Exhibit A-3 Comments from Individuals (Letters 18–125)

Letter #	Commenter	Issues	See Final EIS Section
18	Nancy Thomas	1. Outdoor performance space: noise	3.1.3(1), 3.12
		2. Outdoor performance space: traffic	3.11.16
19	Dave Eiffert	1. Clarify whether outdoor performance space included in Proposal	3.1.3(1), 3.8.5
		2. Water sources	3.14
20	Natalie Williams	1. Preserve natural design of Mill Pond Road	3.11.11
21	Dave Eiffert	1. Supports except the outdoor performance space	3.1.3(1)
22	Lisa Ozaeta	1. Supports except the amphitheater	3.1.3(1)
23	Helene Baradat	1. Supports except the amphitheater	3.1.3(1)
24	Maria Cristina Berg	1. Supports except the amphitheater	3.1.3(1)
25	Rob & Ashleigh McCann	1. Opposed to the amphitheater; clarify if in or out	3.1.3(1)
26	a. Sharilyn Lux; b. Peggy Shepard	1. Concern about "grave site" 2. Question about appeal procedures	3.10.4 3.1.3
27	Li Hsi	1. Opposed to amphitheater	3.1.3(1)
28	Richard Scheel	1. Request retraction of Draft EIS, until public meetings can be held	3.1.1(4)
29	Richard Scheel	1. Requests in-person public meetings on Draft EIS	3.1.1(1)
30	David Eiffert	1. Public meeting or public hearing	3.1.1(1)
		2. Noise from amphitheater	3.1.3(1), 3.12
31	Cristie Coffing	1. Requests public hearing (WAC 197-11-535)	3.1.1(1)
32	Julie Lake	1. Requests public hearing per WAC	3.1.1(1)
33	Monica Lowney	1. Requests in-person public hearing per WAC	3.1.1(1)
		2. Public hearing	3.1.1(1)
34	Haley Williamson	1. Requests in-person public hearing per WAC	3.1.1(1)
35	Xandra Trostel	1. Requests in-person public hearing per WAC	3.1.1(1)
36	Elaine Armstrong	1. Requests in-person public hearing per WAC	3.1.1(1) n
37	Wayne A. Russell	1. Requests in-person public hearing per WAC	3.1.1(1)
		2. Form of notice, public hearing, notifying adjacent unincorporated King County	3.1.1
38	Christina Omalie	1. Do not develop site – do not need more buildings	3.1.3(1)
39	Kolbi Tabakci	1. No benefit to City from project	3.1.3(1)
		2. Request public meeting per WAC	3.1.1
40	Kristina Huntley	1. Opposes amphitheater, but retail ok	3.1.3(1)
41	Xandra Trostel	1. Postpone public meeting, virtual meeting not adequate	3.1.1
42	Philip Williamson	1. Requests public meeting per WAC	3.1.1
43	Julie Christensen	1. Requests public meeting per WAC	3.1.1(1)

Letter #	Commenter	Issues	See Final EIS Section
44	**Matthew Baerwalde (Snoq. Tribe)[2]**	1. Requests extension of comment period	3.1.1(3)
45	**Philip Williamson**	1. Requests public meeting per WAC	3.1.1(1)
46	**Dawn Harper**	Generally opposes project:	
		1. Flooding	3.1.3(1), 3.4.1
		2. Traffic	3.1.3(1), 3.11.13
		3. Wildlife	3.1.3(1), 3.5
		4. History	3.1.3(1), 3.10
		5. Opposes project	3.1.3(1)
47	**Ike Balmer**	1. Requests public hearing per WAC	3.1.1
48	**Emily Lee**	General concerns:	
		1. Flooding	3.1.3(2), 3.11.13
		2. Wildlife	3.1.3(2), 3.5
		3. Traffic	3.1.3(2), 3.11.13
		4. History	3.1.3(2), 3.10
49	**Dawn Harper**	1. Requests in-person meeting	3.1.1
50	**Emily Lee**	1. Requests in-person public hearing per WAC	3.1.1
51	**Andrea Williamson**	1. Requests public hearing	3.1.1
52	**Mike Akers**	1. Requests public hearing per WAC	3.1.1
		2. Studies not sufficient (traffic, wetlands, environmental, social)	3.1.2(4)
53	**Emily Lee**	1. Requests in-person public hearing	3.1.1(1)
54	**Amy Kosche**	1. Requests in-person public hearing	3.1.1(1)
55	**Greg Balmer**	1. Requests in-person public hearing	3.1.1(1)
56	**Philip Williamson**	1. Question about timing of public hearing	3.1.1(1)
57	**Dick Scheel**	Timing Questions: 1. 180-day window for completing Draft EIS (per SMC 19.04.080 C)	3.1.2(3)
58	**Emily Lee**	1. Statement about preference for in-person meeting	3.1.1(1)
59	**Dana Hubanks**	1. Requests in-person public hearing per WAC	3.1.1
60	**Dave Eiffert**	1. Snoqualmie Merchant's Association Survey – opinions regarding project summary of responses	3.1.3(1)
61	**Amanda Rich**	1. Generally opposes based on site's historic value, traffic, wildlife impacts	3.1.3(1)

[2] Letter No. 44 (Matthew Baerwalde), requesting an extension of the comment period, was inadvertently categorized as from an Individual rather than from a Government Agency/Tribe. Apologies for the mistake.

Letter #	Commenter	Issues	See Final EIS Section
62	**Monica Lowney**	No comment on Draft EIS. Questions the City staff regarding distribution list	3.1.3(4)
63	**Julie Lake**	1. Objects to timing of public meeting	3.1.1(1)
		2. Questions rezoning of parcels to SF and Heavy Industrial	3.8.5
64	**Julie Lake**	1. Zoning	3.7
		2. Heavy industrial use	3.8.5
65	**Jill Brandenburg**	1. Non-city residents' "voices" should be heard	3.1.3(4)
		2. Non-EIS comment about City government	3.1.3(4)
66	**Lesley Sheppard**	1. Forwarded letter to City Council raising various concerns asking them to read EIS carefully and to confirm information on impacts (floodplain, contamination, traffic, schools, PA 2 & 3, Mill Pond, SMP)	3.1.3(2)
67	**Alison Uno**	1. Supplemental review (PA 2 & 3)	3.1.2(2), 3.1.2(4), 3.11.12
		2. Figures and maps water adequate	3.1.3(2)
		3. Borst Lake impacts	3.4.3(2), 3.11.16, 3.6.7
		4. Bull trout	3.5.4(1)
		5. Wildlife	3.5.3(1), 3.11.13
		6. Wetland buffers	3.5.2
		7. Uses in central open space incompatible	3.1.3(3)
		8. Use pervious materials where possible	3.1.3(3)
		9. Invasive species	3.5.3(1)
		10. Choose alternative with more jobs	3.8.5
		11. Traffic impacts – noise, bicycles, and mitigation (trail system connections)	3.11.5, 3.11.6, 3.11.13, 3.12
		12. Noise from outdoor performance facility	3.1.3(1), 3.12
		13. Traffic from events	3.1.3(1), 3.11.16
		14. Traffic on rural road	3.11.9
		15. Emergency access for flood events	3.11.13
		16. Traffic counts	3.11.1
		17. No analysis of electric power	3.1.2(5)
		18. Viability of retail not analyzed	3.8.5, 3.15.1
68	**Mary Norton**	1. Inconsistent whether amphitheater included in project	3.8.5(5)
		2. Open space categories	3.8.5(5)
		3. Problems with maps	3.1.3(1)
		4. Multiple Comprehensive Plan problems/conflicts	3.8.1
		5. Traffic analysis	3.11.1
		6. Noise analysis	3.12
		7. View analysis	3.9
		8. Borst Lake not analyzed	3.4.3(2), 3.6.7

Letter #	Commenter	Issues	See Final EIS Section
		9. Buffer averaging; is river exempt from water quality controls?	3.4.4(1)3.5.2(1)
		10. Impact of floods on services	3.13
		11. Emergency management in floods; recovery after floods	3.13
		12. Recovery after floods. Water conveyance in floodway	3.1.3(3)
		13. Effect on downtown businesses	3.15.2
		14. Trail connections	3.11.5
		15. Should not build in floodplain	3.1.3(1)
69	**Richard Scheel**	1. EIS not completed in 180 days per SMC 19.04.080(C) unless applicant agrees	3.1.2(3)
		2. Gov's proclamation 20-28 prohibits taking "action"; AG Guidance, March 26 – not "necessary and routine"	3.1.1(2), 3.1.1(3), 3.1.3(3)
		3. City should withdraw EIS and reissue after emergency	3.1.1(4)
70	**Patricia Fels (PTF Architects)**	1. Maintain existing buildings. Attachment: 2006 Rehabilitation Study of Power House	3.10.5
71	**Konnie Surmann**	1. Does not address traffic	3.11.13
72	**Wayne Russell**	1. Timing of meeting	3.1.1
		2. Problems with process, public records request	3.1.1(2)
		3. 30-day extension	3.1.1(3)
		4. Illegal berm/fill	3.8.1
		5. Traffic, new bridge	3.11.7, 3.11.16
73	**Maxine Loveless**	1. Requests in-person public meeting per WAC	3.1.1(1)
74	**Michelle Huelmann**	1. Requests in-person hearing per WAC	3.1.1(1)
75	**Karen Eggleston**	1. Requests in-person hearing	3.1.1(1)
76	**Adrian Eggleston**	1. Requests in-person hearing	3.1.1
77	**Richard Scheel (see letter No. 69)**	Resubmits previous comments on process	Refer to Letter No. 69
78	**Suzy & Don Berger**	1. OK with project; object to amphitheater (is it in or out?)	3.1.3(1)
79	**Richard Scheel**	1. Problems with Zoom meeting (time, login, time limit)	3.1.1(1)
80	**Richard Scheel**	1. ID of referenced documents not included in Draft EIS	Refer to City website
81	**Natalie Williams**	Thanks for notice of extension	3.1.1(3)
82	**Robin Gray**	1. Opposed to project	3.1.3(1)
83	**Aiko Mizumori Canfield**	1. Commemorate history of site	3.10.3, 3.10.5
84	**Fuzzy Fletcher**	1. Procedures: 180-day time limit per SMC for EISs; Gov's proclamation regarding "actions"; withdraw Draft EIS	3.1.1
		2. Coalition of small police agency not an alternative to SPD police	3.13

Letter #	Commenter	Issues	See Final EIS Section
		3. Statement regarding call data	3.13
		4. Lack of data regarding commercial calls	3.13
		5. Need for ladder track and two firefighters	3.13
		6. Old data in response time	3.13
		7. "Could" vs "will"	3.1.2(6)
		8. Timing of demand vs mitigation	3.11.12
		9. "could vs "will"	3.1.2(6)
		10. Tourism impacts	3.13
		11. Payment for ladder track	3.13
		12. Timing of mitigation	3.13
		13. Redevelop Alternative impacts	3.1.3(1)
		14. Fiscal impacts adverse until most of project developed	3.15.3
		15. Supports No Action	3.1.3(1)
85	**Thyra Demetrick**	1. Not consistent with rural feel	3.1.3(3), 3.9
		2. General concerns about traffic, noise, light, character	3.1.3(1)
		3. Don't need more retail	3.8.5, 3.15
		4. Leave site as it is	3.1.3(1)
86	**Janelle McCarty**	1. Supports more affordable housing, people of color, some economic diversity	3.8.5
87	**Josh Bennett**	1. Opposes project, but supports DirtFish	3.1.3(1)
88	**Andrew Rossiter**	1. Preserve DirtFish	3.8.5
89	**Riley Wilkins**	1. Supports no development of site	3.1.3(1)
90	**Antonio Gil**	1. Opposes project	3.1.3(1)
91	**Daniel Giorello**	1. Opposed to development in Snoqualmie	3.1.3(1)
92	**Taylor R. Faires**	1. Preserve DirtFish	3.8.5
93	**Michelle Twohig**	1. Water pollution	3.1.3(1)
		2. Traffic	3.11
		3. Competition with downtown	3.15.2
		4. Opposes project	3.1.3(6)
94	**Michelle Twohig**	1. Need environment compliance for site	3.6.1
95	**Rachel Kramer**	1. Concerns about contamination and traffic	3.1.3(2), 3.11.15
96	**Carson Bolt**	1. Development doesn't benefit community; prefers park, museum, Farmer's Market	3.1.3(1)
97	**Jim Simon**	1. Unwise use of floodplain	3.4.1(1)
		2. Background info	3.4.1(1)
		3. Flood area designation outdated	3.4.1(1)
		4. Reasons to protect floodway	3.4.1(1)

Letter #	Commenter	Issues	See Final EIS Section
		5. Rise in base floodplain in computations	3.4.1(1)
		6. Flood data and cites letters/memos from King County	3.4.1(1)
		7. Fails to reference magnitude of 2009 flood	3.4.1(1)
		8. Flood data	3.4.1(1)
		9. FEMA regulations	3.4.1(1)
		10. Questions adequacy of hydraulic analysis	3.4.1(1)
		11. Phased review not appropriate	3.1.2(2), 3.4.1(1)
		12. Modeling not appropriate, worst-case analysis requested	3.4.1(1)
		13. Supplemental EIS required	3.4.1(1)
		14. Disagrees with elevation of floodplain used to calculate compensatory storage	3.4.1(1)
		15. Provide data regarding amount permit fill	3.4.1(1)
		16. Gravel bars	3.2.6
		17. Rain storms	3.2.6
		18. Conveyance capacity assumption incorrect	3.4.1(1)
		19. Analyze floodplain per conditions over past 66 years	3.4.1(1)
		20. Borst Lake OHWM not determined	3.4.1(1), 3.4.3(2)
		21. Project will modify natural floodplain	3.4.1
		22. Anomalies in gauge record	3.1.3(3)
		23. No analysis of sediment transport	3.2.6
		24. Statement of potential flood monetary damage	3.1.3(3)
		25. Statement about impacts	3.1.3(3)
		26. Public services disrupted during floods	3.11.13, 3.13
		27. Substantial cumulative impacts	3.1.2(2) 3.1.2(4) n
		28. Incomplete analysis and flooding impacts - FIRM maps incorrect/2010 LOMR incorrect	3.4.1(1)
98	**Sheri Bucy**	1. Opposed to performance space	3.1.3(1)(2)
		2. Concern about contamination	3.1.3(2)
		3. Traffic impacts	3.1.3(3), 3.11.16
99	**Monica Lowney**	1. Comment on Fisher Avenue intersection	3.1.3(4), 3.11.12
		2. Question about project pro rata share	3.11.12
		3. Question about signal funding	3.11.12
100	**Kristin Cernak**	1. Opposed to development because of traffic	3.1.3(1)
		2. Opposed to outdoor performance area	3.1.3(1)
		3. Keep development to south of the river	3.1.3(2)
101	**Dawn Harper**	1. Project not in best interest of community	3.1.3(1)
102	**Erin McEachran**	1. Submits information on stormwater violations	3.1.3(4)

Letter #	Commenter	Issues	See Final EIS Section
103	**Karen Ruppert**	1. Wants more analysis of PA 1 contamination	3.6.1, 3.6.2
104	**Anna Boranian**	1. Opposes project	3.1.3(1)
		2. Light pollution	3.9
		3. Wildlife	3.5.3(1)
		4. Historic significance	3.1
		5. Displacement of wildlife	3.5.3(1)
105	**Tim Welborn**	1. Neighborhood to NE excluded	3.1.3(1), 3.9
		2. Future uses not specific enough	3.1.3(1), 3.8.5
		3. Outdoor performance space	3.1.3(1)
		4. Views, light	3.1.3(1), 3.9
		5. Noise	3.1.3(1), 3.12
106	**Mark Sollitto**	1. Defer approval of PA 2 & 3 until cleaned up	3.1.3(3), 3.6.1
		2. Floodway boundary arbitrary	3.1.3(3), 3.4.1(1)
		3. Show calculations for new flood storage by parcel; update maps for floodway & CMZ	3.4.1(1)
		4. King County maps show additional critical areas	3.5.3(2)
		5. Wineries will need to upgrade sewage treatment facilities	3.14
		6. Show/describe regional conservation system	3.14
		7. Transfer density from mall site to somewhere else	3.1.3(3)
107	**Sharilyn Lux**	1. No shoulders on Mill Pond Road – unsafe	3.11.6
		2. Police Dept. can't protect public	3.13
		3. Insufficient fire service available	3.13
		4. I-90 weigh station	3.1.3(4)
		5. Traffic study timing; wrong	3.11.1
		6. Water supply	3.14
		7. Bridges	3.11.7
		8. Crime statistics	3.1.3(3)
		9. Incorrect information cover letter	3.1.2(4)
		10. Police Dept. procedures	3.1.3(3), 3.11.7
		11. Criticism of Mayor's mgmt.	3.1.3(3)
108	**Denise Di Santo**	1. Objects to EIS timing pandemic	3.1.1
		2. Phase 2/3 too general	3.1.2(4)
		3. Transportation impacts/data, noise, police, costs not assessed	3.15
		4.Contamination, fill, berms, and CARA	3.2.2, 3.4.1(1), 3.6.1, 3.6.2
		5. Floodplain; larger setback from river, impact on flood elevation from fill and berm removal	3.4.1(1), 3.4.2(3)
		6. MDP – no detail Ph 2/3, new imperious surface	3.1.2(2), 3.1.3(3), 3.2.2

Letter #	Commenter	Issues	See Final EIS Section
		7. Stormwater discharges to river	3.4.3
		8. Water supply adequacy	3.14
		9. Water quality – wastewater BOD/TSS; costs to upgrade WWTP	3.14
		10. Impact to river temp, facilities in floodplain, flood prevention costs	3.1.2(5), 3.4.2, 3.8.1(i)
		11. Downstream risks not considered	3.4.1(1)(2)
		12. More public participation needed	3.1.3(3)
109	**Jeff Glaser and Claire Nold-Glaser**	1. Reiterate points in DN Traffic Study attachment	3.16
		2. Do not support Proposal	3.1.3(1)
110	**Sandra Larson Tevis**	1. Opposed to concert venue/noise	3.1.3(1), 3.12
		2. General comment on flooding, pollution, environment	3.1.3(2)
111	**Elaine Armstrong**	1. Housing will not be affordable	3.1.3(3)
		2. Details of economic benefit	3.1.2(4)
		3. Cleanup plan	3.6.1
		4. Housing will not be affordable	3.1.3(3)
		5. Assumed decline in CO_2 not accurate	3.1.3(3), 3.3
		6. No green bldgs.	3.3
		7. Should not rely on previous contamination reports	3.1.3(3), 3.6.1
		8. Affordable housing	3.1.3(3)
		9. Light and glare not addressed	3.1.2(1), 3.1.2(3) 3.9
		10. Noise from amphitheater	3.12
		11. Old soil studies used	3.2.7
		12. Added fill recently	3.1.2(4), 3.4.1
		13. Steep slope areas are hazard areas	3.2.7, 3.2.8,
		14. Future geotech analysis needed now	3.2.9
		15. various geotech issues	3.2.9
		16. GHG targets apply	3.3
		17. Traffic data and impacts	3.1.2(3), 3.3, 3.11.2, 3.11.4, 3.11.16
		18. Cleanup data	3.6.1, 3.6.4
		19. Melissa Leong statement – more study of phase 1 needed	3.6.2
		20. Exhibit 3.9-18 photo not accurate	3.1.2(3), 3.9
		21. Need dark sky for amphitheater	3.9
		22. Lead levels in groundwater	3.6.3
		23. Traffic counts	3.9, 3.11.1, 3.14
		24. Transit questions	3.11.4, 3.11.10
		25. Disagrees with am & pm peak trips	3.1.2(3)

Letter #	Commenter	Issues	See Final EIS Section
		26. Fisher Avenue intersection	3.11.12, 3.11.18
		27. Amphitheater trips underestimated	3.1.2(3), 3.11.16
		28. Refers to other letters & experts submitted by SCAN	3.16
112	**Karen Meador**	1. Unique history – wants on-site museum	3.10.5
113	**Dana Hubanks**	1. Was not notified of Draft EIS publication	3.1.1(3)
		2. Site contamination not discussed sufficiently	3.6.1
		3. Draft EIS vague, not enough detail	3.1.2(4)
		4. Wetland analysis does not discuss history of site, Japanese barracks, or use of site for parking or for golf tournament	3.1.3(3), 3.10.3
		5. Incomplete discussion of river health, not enough detail, overgeneralized	3.1.2(3), 3.1.2(4), 3.1.3(3), 3.4.2
		6. Relies on draft SMP	3.8.1
		7. Requests extension of comment period	3.1.1
114	**Lacey Linney**	Refer to letter #17 (SCAN)	3.16
115	**Monica Lowney**	Supplement to previous comments with references to other letters: Pam Jenkins, Sarah Cooke, Gary Norris, Bricklin, KC-DNR, KC Permitting, Ecology, several individual letters	3.16
116	**H. Wentink**	1. Timing of traffic counts	3.11.1
		2. Flooding will carry toxins downstream	3.6.2
		3. Review process should not go forward during pandemic	3.1.1
117	**Maura T. Callahan**	1. EPA designated as hazardous site	3.11.11
		2. Tourism effects on water use	3.14
		3. Noise from amphitheater	3.1.3(1), 3.12
		4. Traffic	3.11.11
		5. Compliance	3.1.3(4)
118	**Julie Lake**	1.Stormwater discharge violations	3.1.3(4), 3.4.1(1)
		2. Environ mitigation identified in professional comments	3.16
		3. Comment period should be extended	3.1.1(3)
		4. No alternatives	3.1.2(1)
		5. Public Records Act (PRA) request	3.1.3(4)
		6. Condition of bridges	3.11.7
		7. Effect on downstream businesses	3.15.2
		8. Opposed to concert venue	3.1.3(1), 3.5.3(1)
119	**Monica Lowney**	1. Negative impacts on rural and resource uses not consistent with CPPs; not considered in regional SEPA documents	3.8.1
		2. Traffic analysis doesn't consider City's inadequate concurrency system	3.8.4, 3.11.18

Letter #	Commenter	Issues	See Final EIS Section
		3. City code doesn't adequately address all significant environmental issues; SEPA gaps	3.1.3(4), 3.8.4
		4. will violate Health Dept. noise standards	3.12
		5. Impacts to all off-site properties not considered; impacts to neighboring jurisdictions and tribes are not considered	3.7
		6. Does not consider cumulative impacts of pipeline projects	3.7
		7. Does not consider all environmental reviews on site and impacted properties	3.1.2(4)
		8. Identify impacts from all discretionary options available under the code	3.8.4
		9. Defers analysis of floodplain impacts	3.4.1(1)
		10. Assumes no air quality/GHG impacts because no standards. Should estimate GHG emissions for project	3.3
		11. ID and evaluate risks to health and environment for each toxic chemical	3.6.1
		12. Should not defer characterization of contaminants; PA 1 characterization not sufficient; no basis to assume risk of fire/explosion is low	3.6.2
		13. Steep slopes on adjacent sites should be evaluated now	3.2.8, 3.2.9
		14. More detailed review of SMP needed	3.1.2(4)
120	**Auryel van Gemert**	1. Incorporate comments from Ecology and SCAN specialists	3.16
		2. Should not build on hazardous site	3.1.3(1)
		3. Traffic congestion	3.1.1(3), 3.11
		4. Destruction of habitat	3.1.1(3), 3.5.3
		5. Do not cut down trees	3.1.3(3),
121	**Wayne Russell**	1. Borst Lake left out; issues weir	3.4.3(3), 3.6.6
		2. Fill in floodplain; illegal berm fill	3.4.1(1), 3.8.1(H)
		3. Maintenance of stormwater wetlands	3.4.4
		4. Comments on existing conditions info – berm; fill	3.4.1, 3.8.1(H)
		5. Realignment of Mill Pond Road & project entrance will require fill	3.1.3(4)
		6. Truck traffic will increase on haul road	3.11.13
		7. SR 202 bridge will need to be replaced	3.11.7
		8. Fill & compensatory storage are a concern	3.4.1(1)
		9. Maintenance of stormwater system	3.1.3(4)
		10. Borst Lake weir	3.4.1(1)
		11. 2010 LOMR should have excluded north side of river	3.4.1(1)
		12. Stormwater treatment; additional imperious; decrease in groundwater recharge	3.2.2, 3.4.4(1)

Letter #	Commenter	Issues	See Final EIS Section
		13. Outfall & wildlife crossing not feasible	3.1.3(4), 3.5.3(1)
		14. Speculates that City & applicant changed floodway to floodplain on 2010 LOMR	3.1.3.(4)
		15. Mitigation not sufficient; significant unavoidable adverse impacts	3.1.2(2)3.1.2(6)
		16. Comments on issues outside EIS & project	3.1.3(4)
		17. Wetland along haul road stagnant	3.1.3(2), 3.5.2(1)
		18. Misc. mentions of wildlife	3.5.3(1)
		19. Private mgmt. of outfall a concern	3.1.3(2), 3.5.2(1)
		20. Disagrees w/figures in MDP appendix	2.1.3(3)
		21. uncertainties re: City plans for sewer water	3.14
		22. Statements about Borst Lake weir	3.4.1(1)
		23. Structures planned in CMZ; presumes impact from project; significant unavoidable adverse impacts	3.2.4
		24. Too many variables in EIS	3.1.2(4), 3.1.3(4)
		25. Comments about public process/appeals	3.1.3(4)
122	**Richard Scheel**	1. Draft EIS process invalid	3.1.1(3)
		2. Referenced document not available	3.1.1(4)
		3. SMP not approved by Ecology	3.5.2(2), 3.8.1
		4. Water system plan not valid; expired in 2019	3.14
		5. Entire contaminated site must be addressed	3.6.1
		6. Effect on salaries	3.1.1(4)
		7. Redevelopment would require more police	3.13
		8. Fiscal studies do not include damages to roads from construction	3.1.2(5), 3.15
		9. Who pays for infrastructure not clear/consistent	3.1.3(3), 3.11.12, 3.15
		10. Fiscal Analysis should estimate different/non-wine business	3.8.5, 3.15
		11. Competition from new business space and existing vacancies	3.15.2
		12. Visitors to PA 1 will not visit downtown – distance and road access	3.1.3(3)
		13. Negative impact on existing businesses	3.5.3(1), 3.15.2
		14. Lower paying jobs will have to commute	3.1.1(4), 3.11.2
		15. Fiscal needs to look at "worst-case outcome" for City	3.15.5
		16. Includes other letters by reference	3.16
123	**Dick Scheel**	1. City water plan outdated; several issues identified with 2013 water plan. Issues with wellfield, contamination, CARA, others	3.14
		2. Inadequate assessment of Superfund designation	3.1.1(3), 3.6.1

Letter #	Commenter	Issues	See Final EIS Section
		3. Pre-Annexation Agreement requires removal of berm and illegal fill	3.8.1
		4. Comprehensive Plan requires sufficient cleanup; encourages assessment of Mill Pond.	3.8.1
		5. Comments on Ecology NPDES permit	3.1.1(4)
124	**Kathleen Schneider**	1. Could the project change from PCI Plan to Redevelopment Alternative?	3.1.2(1)
		2. No commitment to mitigate/pay	3.1.2(6), 3.1.3(3)
		3. Increased road maintenance costs	3.15
		4. Too many wineries	3.8.5
		5. Projected revenue overly optimistic	3.15
		6. Floodplain maps are old; they want to remove PA 1 from floodplain	3.4.1(1)
		7. Are Powerhouse and Planer buildings important?	3.10.5
		8. Date for new I-90 ramp completion optimistic	3.1.3(3)
		9. Erosion control	3.1.2(2)
		10. What if fuel standards are reduced (air quality)?	3.3
		11. Potential impact of treated/warmer stormwater	3.5.1(2)
		12. Use of "may" vs "would" for mitigation; blackberry removal	3.1.2(6)
		13. Use of "should" vs "must"	3.1.2(6)
		14. Winery permits needed from Ecology, DOH	3.8.1
		15. Questions adequacy of water and sewer facilities	3.1.3(3), 3.14
		16. Extent of wetland buffer encroachment	3.5.2(1)
		17. Who will be responsible for maintenance in the future if the project sells?	3.1.3(4)
		18. Can't tell if the Proposal complies with the SMP since it is not adopted	3.8.1
125	**Jeff Glaser & Claire Nold-Glaser (SCAN)**	1. Bridges	3.11.7
		2. Construction traffic impacts	3.11.8
		3. Potential traffic diversion through valley	3.11.9
		4. Have observed increased traffic, noise, accidents on SR 202	3.11.15
		5. Transportation analysis in EIS inadequate; cites DN Traffic Study conclusion	3.1.3(3)
		6. Construction impacts capacity, pavement	3.1.2(5)
		7. Project should not proceed until funding is secured for all improvements	3.1.3(3), 3.11.12, 3.13
		8. Does not support project	3.1.3

Exhibit A-4 Comments from May 20, 2020 Public Hearing (Letters T1–T21)

Letter #	Commenter	Issues	See Final EIS Section
T1	**Richard Scheel**	1. EIS not completed in 180 days	3.1.2(3)
		2. Publication not consistent with Governor's proclamation 20-28	3.1.1(2)
		3. Not consistent with Attorney General guidance	3.1.1(3)
		4. Withdraw EIS	3.1.1(4)
T2	**Cynthia Krass, Snoqualmie Valley Preservation Alliance**	1. Evaluate downstream impacts	3.4.1(2)
		2. Loss of flood storage	3.4.1(1)
		3. Effects on groundwater and base flow	3.2.2
		4. Consistency with Comprehensive Plan policies on removal of fill	3.8.1
		5. What are impacts to Threatened & Endangered (T&E) species	3.5.3(1)
		6. Requests extension of comment period	3.1.1
T3	**Elaine Armstrong, Citizens Climate Lobby**	1. Housing will not be affordable	3.8.1
		2. Traffic assumptions not accurate	3.1.3(3)
		3. Maintain housing at affordable rents	3.8.5
		4. Can LEED certification be required/enforced?	3.1.2(5)
		5. Timing of traffic studies	3.11.1
		6. Questions assumption that more efficient cars will reduce GHG	3.1.3(3), 3.3
		7. Questions statement that small project will not affect GHG	3.1.3(3)
T4	**Haley Williamson**	1. Wants longer extension	3.1.1
		2. Impacts outside city	3.1.2(5)
		3. Validity of traffic data	3.1.1(3)
		4. Summer traffic	3.11.1, 3.11.16
		5. Growth around High School	3.11.2(3)
T5	**Monica Lowney, Sierra Club**	1. 180-day rule	3.1.2(3)
		2. Violates Governor's proclamation	3.1.1
		3. In-person meeting; objects to 3-minute speaking limit	3.1.1
		4. Include Borst Lake	3.4.3, 3.6.7
		5. Soil samples for PCBs not sufficient	3.1.3(3), 3.6.1, 3.6.4
		6. Army Corps did not comment on berm around Borst Lake	3.1.3(4)
		7. Fire equipment can't reach height of proposed buildings	3.11.13, 3.13
		8. Truck traffic/weight	3.11.11
		9. Do not allow pesticide spraying near waterways	3.1.3
		10. Recognize Japanese workers' history	3.1.3

Letter #	Commenter	Issues	See Final EIS Section
T6	**Gary Norris, DN Transportation (SCAN)**	1. Traffic counts	3.11.1
		2. Trip generation	3.11.2
		3. Safety impacts	3.11.6
		4. Bridges	3.11.7
		5. Regional road system impacts	3.11.9
		6. Pedestrians/bikes	3.11.5
		7. Funding not identified	3.11.12
		8. Market analysis needed	3.1.3(4), 3.15.1
T7	**Carol Fix**	1. Requests extension	3.1.1
		2. Site access not identified	3.8.5
		3. High School traffic not included	3.11.4
		4. Weekend traffic	3.11.16
T8	**Lesley Sheppard**	1. Heavy industrial	3.8.5
		2. Project is in floodplain	3.8.1
		3. SMP not addressed	3.8.1
		4. Borst Lake not addressed	3.4.3, 3.6.7
T9	**Annie McElroy Johnson**	1. Unincorporated residents can't vote on issues	3.1.3(4)
		2. Extend comment period	3.1.1
		3. Not enough detail on biology	3.1.2(4), 3.5.3(1)
		4. Not enough detail on mitigation	3.1.2(4)(6)
		5. Impacts to wildlife	3.5.3(1)
		6. Impacts to bikes and wildlife from traffic	3.5.3(1)
T10	**Amanda Rich**	1. Level of Service (LOS)	3.11.4
		2.Timing of traffic counts	3.11.1
		3.Traffic noise	3.12
		4. Impacts to services; hospitals not included	3.1.2(5), 3.13
T11	**Auryel van Gemert**	1. Concerned about climate change	3.3
		2. Impacts to river/fisheries	3.5.1(1), 3.5.1(2), 3.5.4
		3. Impacts to wildlife/T&E species	3.5.3(1)
T12	**Julie Lake, SCAN**	1. In-person meeting and extension of comment period	3.1.1
T13	**Tom Wood**	1. GHG – Redevelopment Alternative/amphitheater	3.3
		2. LOS for I-90 modeling (no eastbound estimate)	3.11.9
T14	**Wayne Russell**	1. Unhappy about process; not transparent	3.1.3(4)
		2. Review period	3.1.1
		3. Berm's effect on FIRM designation (changed from floodway to floodplain); disagrees with BFE	3.4.1(1)
		4. Wildlife underpass not feasible	3.1.3(1)
T15	**Kim Lingo**	1. Unhappy with process during pandemic	3.1.1
T16	**Ray Nelson**	1. Extend process	3.1.1

Letter #	Commenter	Issues	See Final EIS Section
T17	**Denise di Santo**	1. Downstream effects on T&E species	3.4.2, 3.5.4
		2.Concern about potential entrainment of contaminants	3.1.3(2), 3.1.3(3)
		3. Weekend traffic	3.1.1(3), 3.11.16
		4. Delay process	3.1.1
T18	**Cristie Coffing, SCAN**	1. Historic - JACL	3.10.3
		2. Survey trenches	3.10.2
		3. No management of cultural resources	3.10.1
		4. Trench #5 not identified	3.10.2(1)
		5. Location of trenches redacted	3.10.2(1)
T19	**Sharilyn Lux**	1.Inconsistencies in EIS cover memo (jobs, open space)	3.1.2(4)
		2. No shoulders on Mill Pond Road	3.11.5, 3.11.6
		3. Safety for concert goers	3.11.6
		4. Peak hours not accurate (High School)	3.1.3(3)
		5. Signal wait times not accurate	3.1.3(3)
		6. Roads not adequate for truck traffic	3.1.3(3)
T20	**Gregg Balmer**	1. Inadequate time to review Draft EIS	3.1.1
		2. Infrastructure inadequate (roads, sewer)	3.13
		3. Who will pay to upgrade; growth should pay	3.13, 3.15
		4. Project not consistent with King County growth plans	3.8.2
T21	**Christine Iverson Stinson**	1. Inadequate analysis of Meadowbrook bridge	3.1.3(3) 3.11.7
		2. Not enough time to review	3.1.1, 3.13

Copies of the comment letters and public hearing transcript are presented on the following pages. The comments have been "annotated" in the right margin to correspond to the letter numbers and issues as presented in the exhibits above (e.g., 1-1, 1-2, etc.).

Letter No.1

Mark Hofman

From: ECY RE NW SEPA (NWRO) <nwsepa@ECY.WA.GOV>
Sent: Thursday, July 09, 2020 8:28 AM
To: Shared Mill Site EIS; Mark Hofman
Cc: Bommarito, Meg (ECY); Buroker, Thomas (ECY); Bardy, Louise (ECY); Gresham, Doug (ECY); Griffith, Colleen (ECY); Lauden, Andrea (ECY); Piazza, Katelynn (ECY)
Subject: ECY SEPA 202002223 - Snoqualmie Mill EIS - Comments
Attachments: 202002223_ECYCommentLetter.pdf
Categories: Green category

RECEIVED
JUL - 9 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Good Morning,

Thank you for the opportunity to comment on the Snoqualmie Mill Planned Commercial/Industrial Plan Draft EIS (Lead Agency File No(s). SEPA 2017-0002). Ecology's comments are attached. Please ensure the applicants receive a copy.

[Statewide SEPA Register No. 202002223]

Katelynn Piazza (she/her)
ERTS & SEPA Coordinator
Washington State Department of Ecology
Northwest Regional Office
3190 160th Ave SE | Bellevue, WA 98008-5452
(425) 649-7229 | katelynn.piazza@ecy.wa.gov

NOTICE: This communication is a public record and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56).

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341

July 9, 2020

Mark Hofman, SEPA Responsible Official
Community Development Department
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Re: Snoqualmie Mill Planned Commercial/Industrial Plan Draft EIS
File# SEPA 2017-0002, Ecology SEPA# 202002223

Dear Mark Hofman:

Thank you for the opportunity to provide comments on the **Snoqualmie Mill Planned Commercial/Industrial Plan**. Based on review of the State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS) for this Project, the Department of Ecology (Ecology) has the following comments regarding Section 3.0 Environmental Analysis:

SHORELANDS AND ENVIRONMENTAL ASSSITANCE PROGARM
Doug Gresham, (425) 649-7199, doug.gresham@ecy.wa.gov

3.3 Water Resources

3.3.2 Impacts

- This describes hydrologic sub basins for wetlands under existing and proposed conditions. Within Planning Area 1 there will be changes in hydrology to the Wetland 12 and Borst Lake sub-basins from converting pervious to impervious surfaces. Storm water runoff from these new impervious surfaces will be detained and treated in constructed wetlands and storm water facilities but this affects the timing and volume of how water flows into wetlands. This impact should be mitigated by maintaining surface water and groundwater inputs to these wetlands so there is no more than a ±20% change over existing conditions. 1-1

3.3-18 Planning Area 1 Stormwater Plan

- Water quality impacts to wetlands from stormwater runoff of pollution generating impervious surfaces should be minimized. 1-2
    - The use of dispersion trenches in the Wetland 12 buffer areas is not consistent with Ecology guidance (*Wetlands in Washington State Volume 1: Synthesis of the Science*). Stormwater outfalls located in wetland buffers are not as effective in

removing sediment and pollutants. The dispersion trench should be located at the perimeter of the buffer so the vegetation and soils are more effective in removing pollutants. 1-2

- Biofiltration swales in parking lots may not remove enough pollutants to be discharged into the Snoqualmie River. The design of these swales should comply with the Ecology's *Stormwater Management Manual for Western Washington.* 1-3
- Water quality monitoring should occur in the stormwater constructed wetlands to measure the effectiveness of these features. The assumption that sediment, dissolved metals, and petroleum hydrocarbons will be removed by passing through the constructed wetland needs to be verified. A comparison of before and after samples especially during significant storm events will quantify this effectiveness. 1-4
- Stormwater runoff from building roofs and landscaped areas should be separated from pollution generating surfaces to reduce the volume of water that is treated. Roofing materials that contain metals and hydrocarbons, and landscaping practices such as fertilizing and pesticide applications, should be avoided to ensure this stormwater is clean. 1-5

3.4 Plants and Animals

3.4.2 Impacts

- This describes buffer averaging for Wetlands 12 and 28 within Planning Area 1. The proposed buffer width reduction averaging 36% for Wetland 12 and a 48% reduction for Wetland 28 is not consistent with Ecology guidance where buffer reduction should be no more than 25% (*Wetland Guidance for CAO Updates: Western Washington Version*). The Wetland 12 buffer reduction down to 16' instead of 165' in one location is also not consistent with Ecology guidance. This impact needs to be mitigated by enhancement and restoration of degraded buffers, and protecting buffers in open space tracts that form migration corridors. 1-6

TOXICS CLEANUP PROGRAM

Louise Bardy, (425) 649-7209, louise.bardy@ecy.wa.gov

3.5 Environmental Health

3.5.1 Affected Environment

- The Weyerhaeuser Snoqualmie Mill facility is listed on the Ecology Confirmed and Suspected Contaminated Sites List, due to releases from historic activities including, but not limited to, former petroleum underground storage tanks, PCB-containing transformer spills, lumber preservation activities (using pentachlorophenol, etc.), and manufacturing of plywood, among other activities, that could create a release of hazardous substances to the environment. Information in the Ecology site database indicates that the site has not had a comprehensive remedial investigation according to the Model Toxics Control Act 1-7

(MTCA) regulations (WAC 173-340). The following entries in the Ecology database are pertinent to the facility:

- Weyerhaeuser Snoqualmie Mill
  - Facility Site ID 2274
  - Cleanup Site ID 2049
- Weyerhaeuser Snoqualmie
  - Facility Site ID 73953138
  - Cleanup Site ID 10346
  - Leaking Underground Storage Tank (LUST) ID 401

1-7

- Ecology considers this historic facility to be one very large and complex site. The division of several planning areas does not preclude the need to conduct a comprehensive environmental investigation that includes environmental sampling of soil and ground water as well as surface water and sediment at the site. This type of investigation needs to be done on all the planning areas and the entire facility to document the environmental conditions. This documentation will inform future uses.
- If the project is built without incorporating characterization and possible remediation of the soil and potential groundwater contamination (including impacts on adjacent properties), the responsibility for potential cleanup in the future will remain with the Potentially Liable Person(s), as defined in the MTCA regulations.
- Ecology does not agree with statements in the DEIS that there are no known or suspected contaminants in Planning Area 1. Below are a few of our concerns:
  - Because the area has been filled over time, up to 16 feet in some areas, the likelihood of contaminated fill is high. There are many possible contaminants of concern from fill materials, such as the use of boiler ash (containing heavy metals) that was likely used as fill material.
  - This area is in a flood plain which has had many floods that could easily spread contamination.
  - If the area was used primarily for log staging, the logs could have been treated with pentachlorophenol, and heavy metals such as arsenic and copper, that could have leached to soils.
  - There were likely chemical treatments, including the use of glues for plywood manufacture in areas adjacent to the Planning Area 1. The plywood plant (just adjacent to the area) burned down. There could be many chemicals released throughout the area from such a huge conflagration, including dioxins and furans.

1-8

- Once a comprehensive remedial investigation is complete that characterizes the nature and extent of contamination at the site, and if hazardous substances are found over state cleanup levels, a feasibility study needs to be developed to evaluate cleanup alternatives.

1-9

- If project construction proceeds without incorporation of measures to protect human health and the environment from exposure to the existing contamination, or the contamination is exacerbated (by spreading to other areas of the project property,

1-10

adjacent properties, or unpermitted properties accepting contaminated soil from the project property), liability for cleanup of the contamination could expand accordingly. 1-10

- Given that the property is a listed contaminated site, all workers who may contact contamination must have 40-hour hazardous waste training, current annual 8-hour refresher training, and conduct work in accordance with a site-specific health and safety plan (HASP) prepared by a qualified person (see WAC 296-843). The HASP includes procedures to prevent exposure to site workers and the public, and additional releases of contamination, during excavation, handling, transport, and disposal operations. 1-11

WATER QUALITY PROGARM
Colleen Griffith, (425) 649-7041, colleen.griffith@ecy.wa.gov

The Snoqualmie Mill Development Plan is stated to be "guided by the 2016 King County Stormwater Management Manual (KCSWDM), and the 2012/2014 Department of Ecology Stormwater Manual for Western Washington (Ecology Manual)" (page 2-29). This use of both manuals is repeated in 3.3.1 under the heading of "Regulatory Environment" where the document states the primary regulatory framework for stormwater management for the Snoqualmie Mill site includes, in order of priority, the Appendix 1 of the Western Washington Phase II Municipal Stormwater Permit; the 2012/2014 Ecology Manual Appendix I-E, the City of Snoqualmie Addendum to the 2016 KCSWDM, and the 2016 KCSWDM.

The 2016 KCSWDM was reviewed by Ecology and determined to be equivalent (at least as protective of water quality or more so) to the 2012/2014 Amended Ecology Manual. The determination of equivalency was based on a review of the KCSWDM as a whole, not in part while utilizing other criteria from other manuals. Local addendums to the approved Phase I programs are not reviewed for equivalency by Ecology. The City of Snoqualmie is responsible for ensuring the Snoqualmie Mill Development designs and constructs stormwater controls in accordance with Clean Water Act requirements expressed in their Phase II MS4 Permit per S5.C.6.b of the 2019 Phase II MS4 Permit (2013-2019 Phase II MS4 Permit citation – S5.C.4.a). 1-12

As such, if the 2016 KCSWDM, the 2016 City of Snoqualmie Addendum, and the 2012/2014 Amended Ecology Manual are being used in tandem for the planning and design of this project, it is incumbent upon the City to ensure that the implemented limitations, requirements, and criteria are reducing the discharge of pollutants to the Maximum Extent Practicable (MEP) and satisfy State AKART requirements.

Stormwater runoff from this project is of particular concern due to the fact that the project location includes sites listed on Ecology's Confirmed and Suspected Contaminated Sites list, and has not had a comprehensive remedial investigation according to MTCA. Additional stormwater control and monitoring requirements will be necessary in order for the project proponent to obtain the Construction Stormwater General Permit (CSGP), which is required before land disturbance begins. The applicant should plan for additional time and documentation regarding soil and groundwater

contamination when seeking CSGP coverage. Additional guidance for contaminated water on construction sites is provided by Ecology **here**.

Of additional concern is the presence within the development area of critical areas such as wetlands. Both permanent stormwater controls and construction stormwater pollution prevention must protect onsite wetlands and streams in accordance with all applicable local and state laws and regulations.

1-12

WATER RESOURCES PROGARM
Andrea Lauden, (425) 649-7081, andrea.lauden@ecy.wa.gov

3.15 Utilities

3.15.1 Affected Environment

It is unclear, based on what is presented, whether the City of Snoqualmie's existing water rights provide sufficient capacity to serve this new development. As stated in this DEIS, the City is required to certify the availability of adequate water supply to serve development at the time that site development and construction is approved. The City should therefore move forward slowly and cautiously when considering or approving new development while exploring additional water sources (Aquifer Storage and Recovery, deep wells, etc.). Please be advised that securing new water rights for the City is not assured, and no development approval beyond the capacity of existing rights should be undertaken until new rights are secured. A more detailed review of the City's water rights portfolio will be conducted by Ecology on the 2020 Water System Plan Update.

1-13

Thank you for considering these comments from Ecology. If you have questions or would like to respond to these comments, please contact one of the commenters listed above.

Sincerely,

Meg Bommarito
Regional Planner
Northwest Regional Office

Sent by email: Mark Hofman, MillSiteEIS@snoqualmiewa.gov

ecc: Tom Buroker, Ecology
Louise Bardy, Ecology
Doug Gresham, Ecology
Colleen Griffith, Ecology
Andrea Lauden, Ecology
Katelynn Piazza, Ecology

Letter No.2

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 9, 2020

Mr. Mark Hofman
SEPA Responsible Official
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98605
mhofman@snoqualmiewa.gov

In future correspondence please refer to:
Project Tracking Code: 2020-01-00740
Property: Snoqualmie Falls Company Mill Site Historic District
Re: Planned Commercial/Industrial Complex Draft Environmental Impact Statement

Dear Mr. Hofman:

The Washington State Department of Archaeology and Historic Preservation (DAHP) has been notified on July 7, 2020 by the King County Historic Preservation Office of the availability for review and comment of the Draft Environmental Impact Statement (DEIS) on Snoqualmie Mill PCI Plan proposal in Snoqualmie. The DEIS has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under auspices of the State Environmental Policy Act (SEPA) to assess potential impacts of the project of cultural resources (including buildings, structures, sites, districts, objects, landscapes, and Traditional Cultural Places) listed in, or eligible for listing in, the National Register of Historic Places (NRHP). Our review is based upon the DEIS dated April 2020 and the Cultural Resources Assessment dated October 23, 2018. Based upon our review, we are providing the following comments/recommendations for your consideration:

1) We note that the project location is within one mile of the Snoqualmie Falls Traditional Cultural Place (TCP) *SquEd,* and the Snoqualmie Falls Hydroelectric Project Historic District, both listed in the NRHP. We understand that the Snoqualmie Tribe has expressed concerns about the indirect effects of the proposal on qualities of *SquEd* that qualify it as a NRHP listed TCP. Therefore, we recommend that the Snoqualmie Tribe be consulted to identify means to avoid or minimize adverse impacts to the TCP. 2-1

2) We concur with the recommendation in the DEIS that the identified historic district at the former Snoqualmie Falls Company (SFCO) Mill Site is eligible for the NRHP, as summarized in Exhibit 3.10-8. Our concurrence is based upon the documentation of the significant role that the SFCO played in the local and regional economy; its role in pioneering change and technology in the lumber industry; and role in the growth and development of the Snoqualmie community. The DAHP would be happy to consult further on the specific boundaries of the proposed historic district. Although the archaeological site associated with the Japanese Community Settlement is physically separated from the main core of the proposed district, and has a truncated timeline, it is 2-2

thematically associated with the mill site and therefore should be considered for inclusion in the district. 2-2

3) In view of the NRHP eligibility of the mill site as a historic district, we recommend that the PCI redevelopment plan incorporate the preservation and rehabilitation of the buildings, sites, and structures that contribute to the historic character of the historic district. We note that the Power Plant and smokestack are already designated King County landmarks. 2-3

4) Please note that in view of NRHP eligibility, historic preservation tax incentives may be applicable for rehabilitation of mill site buildings. To qualify for the incentive, the rehabilitation work must meet *The Secretary of the Interior's Standards for Rehabilitation* (Standards). It is also worth noting that industrial buildings such as those existing at the PCI site have been successfully adapted to new uses (office, commercial, residential, recreational) in examples in Washington and across the nation. Historic preservation tax incentives have been applied in many of these examples. For more information about the federal historic preservation tax credit program, visit: https://dahp.wa.gov/grants-and-funding/federal-historic-tax-credit. 2-4

5) The demolition, alteration, or removal of contributing elements to the historic district should be avoided or minimized to the greatest extent feasible. Rehabilitation of "contributing" resources should always be explored as a preferred development option. If rehabilitation is not the development path chosen, mitigation measures should be identified and implemented that serve to reduce the adverse impact of loss of historic properties. 2-5

6) In view of the cultural and historic significance of the SFCO mill site and Japanese Community site, we recommend that an interpretive plan for the site be developed and implemented. The interpretation plan should be developed in consultation with interested/affected Tribes, as well as other interested parties. 2-6

7) The DAHP strongly recommends that the Japanese Community Site (45-KI-1474) requires more investigation. The site was only investigated in a single trench and it is unknown how large an area the site may cover, and whether or not it is located at the same depth below surface across the entire site. Therefore it is not possible to say at this time whether or not the site will be impacted by the proposed project development in Planning Area 1. The DAHP recommends that a site delineation be undertaken if feasible, as well as monitoring of ground disturbing activities by a professional archaeologist in this area. Any planned work on top of the site may require a DAHP Monitoring Permit or DAHP Site Alteration & Excavation Permit, as under RCW 27.44 and 27.53 a DAHP permit is required for any site alteration, including adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that would change or potentially impact the site. The DAHP would be happy to review the final plans for the area and make specific recommendations. 2-7

8) The DAHP agrees with the recommendation in the cultural resources survey report that further survey work should be conducted in Planning Areas 2 and 3. Specifically, we agree with the Management Recommendations for Areas 2 and 3 as outlined on pages 93-94 of the survey report. This additional survey work should help determine whether or not additional archaeological work will be needed as development in these areas moves 2-8

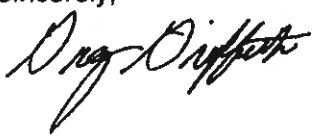
forward. The DAHP requests the opportunity to review the specific plans for these areas as they are developed.

In addition to the comments (above) we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive. Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that Resource documentation (HPI, Archaeology sites, TCP) and reports be submitted electronically. Correspondence must be emailed in PDF format to the appropriate compliance email address. For more information about how to submit documents to DAHP please visit: https://dahp.wa.gov/project-review. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed Guidelines for Cultural Resources Reporting. You can view or download a copy from our website. 2-9

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (2020-01-00740) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me at greg.griffith@dahp.wa.gov or Stephanie Jolivette at Stephanie.Jolivette@dahp.wa.gov.

Sincerely,



Gregory Griffith
Deputy State Historic Preservation Officer

C: Kirsten Larsen, COM, Growth Management Services
Jennifer Meisner, King County Historic Preservation Office
Steve Mullen-Moses, Snoqualmie Tribe, Archaeology and Historic Preservation
Adam Osbekoff, Snoqualmie Tribe, Archaeology and Historic Preservation

Letter No. 3

Mark Hofman

From: Jaime Martin <jaime.martin@snoqualmietribe.us>
Sent: Thursday, July 09, 2020 4:49 PM
To: Shared Mill Site EIS; Mark Hofman
Cc: Smith, Rob Roy; Christopher Castleberry
Subject: Snoqualmie Comments on Draft EIS
Attachments: Snoqualmie Tribe Millsite EIS Comments 7.9.2020.pdf

RECEIVED
JUL - 9 2020
City of Snoqualmie
Community Development Department

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Mark,

Please find attached the Snoqualmie Tribe's comments re Snoqualmie Mill Planned Commercial/Industrial Plan Draft Environmental Impact Statement.

Thank you,

Jaime Martin
Executive Director of Governmental Affairs
Snoqualmie Tribe

Via Email

July 9, 2020

City of Snoqualmie
ATTN: Mark Hoffman, Community Development Director
P.O. Box 987
Snoqualmie, WA 98065
MillSiteEIS@ci.snoqualmie.wa.us

RE: Snoqualmie Indian Tribe's Comments on Snoqualmie Mill Planned Commercial/Industrial Plan Draft Environmental Impact Statement

Dear Mr. Hoffman,

The Snoqualmie Indian Tribe ("Tribe"), a federally recognized sovereign Indian tribe and signatory to the Treaty of Point Elliott of 1855, submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Snoqualmie Mill Planned Commercial/Industrial Plan ("Project" or "Plan").

INTRODUCTION

Based on the DEIS, the Tribe understands the Project to be a sprawling redevelopment over a 261-acre area, over an approximate 10- to 15-year period, that will include 1.83 million square feet of commercial, light industrial, warehouse and office uses; an estimated 3,400 jobs could locate on the site The development consists of three Planning Areas, even though only Planning Area 1 is fully addressed by the DEIS. Planning Area 1, which is in the western portion of the site, would be developed in the nea term with a mix of light industrial, commercial/retail, warehouse and residential uses, developed along pedestrian-oriented main street, and generally focused on the production and storage of wine with supporting retail services such as tasting rooms and restaurants. 160 units of multi-family housing would be developed in upper floors of a mixed-use building in Planning Area 1. Planning Area 2 would be developed for warehouse and manufacturing uses, and Planning Area 3 for office use. 3-1

This multi-use development is a stone's throw from the Tribe's most sacred place, Snoqualmie Falls, and one of the Tribe's businesses and a premier State tourist attraction, Salish Lodge & Spa. For these reasons, the Project raises acute concerns about the future integrity of Snoqualmie Falls and its

environs as a sacred place for future generations of Snoqualmie Tribal members. Indeed, for at least the past three decades, the Tribe has opposed development and desecration of Snoqualmie Falls and the surrounding lands. Nevertheless, the Tribe's concerns continue to be ignored. Although the Snoqualmie Falls Traditional Cultural Property ("TCP") is located adjacent to the Project, impacts of the Project on the TCP and the nearby sacred area known as Two Sisters Return are largely ignored, and the traffic and related impacts on the Falls and Salish Lodge & Spa are drastically understated.

In addition, despite being made available for comment on April 27, 2020, the DEIS turns a blind-eye to the COVID-19 pandemic and the potential significant ramifications the pandemic and society's response to the pandemic, may have on the planned commercial and retail spaces associated with the Project. Even if everything else were appropriately analyzed within the DEIS, which it is not, the failure of the DEIS to take into account the pandemic and the likely economic impact it would have on a project of this scope, is inexcusable and alone required supplementation. 3-1

As explained in detail below, the DEIS fails to comply with the State Environmental Policy Act ("SEPA"). Substantial additional analyses must be performed and the DEIS must be updated as discussed in detail below. If the Final EIS does not include these additional analyses, and if these additional analyses fail to mitigate the adverse impacts caused by the Project, the Tribe respectfully requests that the City of Snoqualmie ("City") exercise its substantive authority under SEPA to deny any permits and authorizations required for the Project.

DISCUSSION

A. Background

The Tribe is heavily invested in the economic and ecological success of the Snoqualmie Valley, and these comments were prepared with that success in mind. The Tribe benefits from a thriving and prosperous homeland, which is why we have always fought for the protection of Snoqualmie Falls and the Snoqualmie River. In recent years, the Snoqualmie Casino has developed into a regional employment center and economic engine, and has emerged as an environmental leader amongst Tribal gaming establishments. These comments reflect the Tribe's desire to continue to improve and steward the Snoqualmie Valley, as the Tribe has done since time immemorial.

1. Significance of Snoqualmie Falls and Surrounding Lands

Snoqualmie Falls remains central to the Tribe's creation story and religious practice. The Tribe believes that the mist generated by Snoqualmie Falls connects the earth to the heavens and that a powerful water spirit lives in the plunge pool below the Snoqualmie Falls. In further recognition of the 3-2

importance of Snoqualmie Falls, Snoqualmie Falls was designated as a TCP on the National Register of Historic Places ("NRHP") in 2009.

The Snoqualmie Falls TCP was designated pursuant to the submission of the NRHP Registration Form ("Registration Form"). The Registration Form draws from numerous studies documenting the cultural, kinship, ecological, religious and even commercial significance of Snoqualmie Falls to the Snoqualmie people. In the following ways, the Registration Form confirms that Snoqualmie Falls and the lands surrounding it, including the Project site, are sacred sites of the Snoqualmie people.

The Registration Form describes the continuing significance of the Falls to Snoqualmie tribal members: "In a recent survey of contemporary Snoqualmie tribal members (Tollefson 1991), a majority of respondents indicated that the Falls continues to be an important cultural site for the Snoqualmie." NRHP Reg. Form, Section 8 at 5. Further, the NRHP Registration Form discusses the Snoqualmie villages historically located above the Falls: "When the Point Elliot treaty was signed in 1855, the Upper Snoqualmie band occupied multi-family houses on the prairies above Snoqualmie Falls". It also describes the distinct diets, kinship ties, and trade characterizing the cultures of the Upper and Lower Bands of the Snoqualmie Tribe. *Id.* According to the Registration Form, Snoqualmie Falls functioned as the critical link between the Upper and Lower Bands. For example, each Band shared their subsistence foods with one another—game from the prairie above the Falls in exchange for salmon and other coastal foods from below the Falls. Land above the Falls also plays a central role in the Tribe's creation story which lies at the foundation of the Tribe's existence. *Id.* at 2-4. 3-2

The cultural and religious significance of Snoqualmie Falls and the lands above it was documented even prior to the nomination of the Falls as a TCP. In 1996, a Cultural Resources Mitigation and Management Plan was submitted on behalf of Puget Sound Power and Light Company for the relicensing of the hydroelectric dam at Snoqualmie Falls, FERC No. 2493 ("Cultural Plan"). The Cultural Plan similarly conveys the cultural and religious significance of Snoqualmie Falls and surrounding lands. Further, the Plan describes Tribe's belief that their religious practices would be diminished by development in the vicinity of the Falls. In relevant part, the Cultural Plan states: "Snoqualmie representatives also wish to keep the entire Falls area in as natural state as possible by avoiding any additional construction and recreation development . . . They are concerned about archaeological sites, including burials, that their oral tradition olds are located in the vicinity of the Falls, and they are also concerned about the cumulative effects of overall development in the vicinity of the Falls." *Id.* at 41. In addition, the Cultural Plan strongly indicates the possibility of archaeological resources above Snoqualmie Falls, including the possibility of a burial site. *See* Cultural Plan at 14, 39, 41.

Together, the Cultural Plan and Registration Form describe the close connection between the Snoqualmie Falls and the lands above them, including the Project site. They further indicate a strong

likelihood that extensive archeological resources remain at the Project site arising from its habitation by the Upper Band of the Snoqualmie Tribe. 3-2

2. Salish Lodge & Spa

The Tribe acquired Salish Lodge & Spa in October 2019. Salish Lodge provides a quintessential Pacific Northwest experience with its 86 luxury guestrooms, and fine and casual dining options. Due to its location, as well as the popularity of the Salish Lodge & Spa and the Snoqualmie Falls, traffic and parking are already a problem on site, and further stresses on the roads and the Route 202 bridge could have immediate and devastating effects on the Salish Lodge & Spa's continued economic vitality. 3-3

B. SEPA Requirements

In adopting SEPA, the Washington legislature declared the protection of the environment to be a core state priority. RCW 43.21C.010. Through SEPA, "[t]he legislature recognizes that each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment." RCW 43.21C.020(3). This policy statement "indicates in the strongest possible terms the basic importance of environmental concerns to the people of the state." *Leschi v. Highway Comm'n*, 84 Wn.2d 271, 279-80 (1974).

Like its federal counterpart, NEPA, SEPA broadly serves two purposes: first, to ensure that government decision-makers are fully apprised of the environmental consequences of their actions and, second, to encourage public participation in the consideration of environmental impacts. *Norway Hill Preservation and Prot. Ass'n v. King Co*, 87 Wn.2d 267, 279 (1976); *Victoria Tower P'ship v. City of Seattle*, 59 Wn. App. 592, 601, 800 P.2d 380 (1990). SEPA requires full disclosure and "detailed" consideration of all affected environmental values. RCW 43.21C.031(1); *see also Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989) (the "hard look" required by NEPA includes all foreseeable direct and indirect effects and full discussion of the negative effects, not just passing mention). At its heart, SEPA is an "environmental full disclosure law." *Norway Hill*, at 272. The *Norway Hill* court also highlighted the legislature's intent that "environmental values be given full consideration in government decision making," and its decision to implement this policy through the procedural provisions of SEPA which "specify the nature and extent of the information that must be provided, and which require its consideration, before a decision is made." *Id.* at 277-78. 3-4

Importantly, SEPA is more than a purely "procedural" statute that encourages informed and politically accountable decision-making. SEPA empowers agencies to say no. *See, Polygon Corp. v. City of Seattle*, 90 Wn. 2d 59, 64-65, 578 P.2d 1309 (1978). An agency's authority to deny a project was settled in *Polygon Corp. v. City of Seattle*, 90 Wn. 2d 59, 70, 578 P.2d 1309, 1315 (1978) (en banc). In that case, Polygon Corporation challenged Seattle's authority to deny a building permit because of adverse impacts

identified under SEPA. The Court upheld the permit denial based on identified adverse impacts to aesthetics as independent grounds under SEPA, regardless of the project's compliance with applicable zoning laws, and the availability of alternatives with less adverse environmental impacts. *Id.* at 70. Courts have confirmed agency's authority to deny projects under SEPA substantive authority in several cases since *Polygon. See, e.g., Dep't of Nat. Res. v. Thurston Cty.*, 92 Wn. 2d 656, 668, 601 P.2d 494, 500 (1979) (denying proposed plat due to significant impacts to resident eagles based on SEPA substantive authority regardless of fact that platting statute did not provide explicit authority to deny plat on environmental grounds); *W. Main Assocs. v. City of Bellevue*, 49 Wn. App. 513, 742 P.2d 1266 (1987) (affirming in part denial of permit based on adoption of comprehensive Plan as SEPA policy and evidence supporting adverse environmental impacts which could not be mitigated); *Cook v. Clallam Cty.*, 27 Wn. App. 410, 414, 618 P.2d 1030, 1033 (1980) (project's potential for creating pressure to alter surrounding land use and the cumulative impact from other similar projects were significant adverse impacts supporting permit denial). *See also W. Main Assocs. v. City of Bellevue*, 106 Wn. 2d 47, 53, 720 P.2d 782, 786 (1986) (en banc) (affirming declaration of illegality of city's restrictive ordinance, but holding in *dicta* that "under [SEPA] a municipality has the discretion to deny an application for a building permit because of adverse environmental impacts even if the application meets all other requirements and conditions for issuance"), *abrogated by Yim v. City of Seattle*, 451 P.3d 694 (2019). In enacting SEPA, the State Legislature gave decision-makers the affirmative authority to condition or even deny projects where environmental impacts are serious, cannot be mitigated, or collide with local rules or policies. WAC 197-11-660.

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SEPA requires an environmental impact statement ("EIS") for any action that has a "probable significant, adverse environmental impact." RCW 43.21C.031(1); WAC 197-11-440(6)(e). SEPA regulations define impact as "the effects or consequences of actions." WAC 197-11-752. SEPA requires that agencies "carefully consider the range of probable impacts, including short-term and long-term effects and shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer." WAC 197-11-060(4)(c). "'Probable' means likely or reasonably likely to occur, as in 'a reasonable probability of more than a moderate effect on the quality of the environment.'" WAC 197-11-782. "'Significance' means a reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794. This determination is guided by criteria in WAC 197-11-330, and "involves context and intensity. . . . The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred." *Id.*

1. Reasonable Alternatives Required

The overarching purpose of an EIS, is to "provide impartial discussion of significant environmental impacts and [to] inform decision makers and the public of reasonable alternatives, including mitigation

measures, that would avoid or minimize adverse impacts or enhance environmental quality." WAC 197-11-400(2). Accordingly, SEPA requires that an EIS contain a detailed discussion of alternatives to the proposed action. RCW 43.21C.030(c)(iii). SEPA supplementary policy regulations require agencies to "Identify, evaluate, and require or implement, where required by the act and these rules, *reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.*" WAC 197-11-030(g) (emphasis added). "Reasonable alternatives" shall include actions "*that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation.*" WAC 197-11-440(5)(b) (emphasis added).

As potential alternatives are identified, they should be measured against certain criteria:

- Do they feasibly attain or approximate the proposal's objectives?
- Do they provide a lower environmental cost or decreased level of environmental degradation than the proposal?

(SEPA Handbook, p. 35).

Washington courts will look to federal case law interpreting and applying NEPA for guidance in interpreting and applying SEPA. *Int'l Longshore & Warehouse Union, Local 19 v. City of Seattle*, 176 Wn. App. 512, 525, 309 P.3d 654 (2013). And, *see, e.g., ASARCO v. Air Quality Coal.*, 92 Wn.2d 685, 709 (1979); *Kucera v. State Dep't of Transp.*, 140 Wn.2d 200, 215-16 (2000). Under NEPA, an EIS must "briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. § 1502.13. *See also Westlands Water District v. United States Department of the Interior*, 376 F.3d 853, 865 (9th Cir. 2004), pointing out that "[a]n agency preparing an EIS must specify the underlying purpose and need for the proposed action." 3-4

The purpose and need statement is significant because the project alternatives arise from that statement. *See City of Carmel-by-the-Sea v. United States Department of Transportation*, 123 F.3d 1142, 1155 (9th Cir, 1997) ("[p]roject alternatives derive from an Environmental Impact Statement's 'Purpose and Need' section.') Indeed, the "stated goal of a project necessarily dictates the range of 'reasonable' alternatives. *City of Carmel*, 123 F. 3d at 1155. *See also Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F.3d 800, 812 (9th Cir. 1999) (same). The consideration of alternatives, in turn, "is the heart of the environmental impact statement." *City of Carmel* at 1155.

A agency must "[r]igorously explore and objectively evaluate all reasonable alternatives" for the proposed action in response to a "specif[ied] underlying purpose and need." *Biodiversity Conservation Alliance v. Jiron*, 762 F.3d 1036, 1083 (10th Cir. 2014). Courts generally look at the objectives identified by the agency in the purpose and needs statement of an EIS to determine whether the agency has considered the reasonable alternatives. *Citizens' Committee to Save Our Canyons v. United States Forest*

Service, 297 F.3d 1012, 1030 (10th Cir. 2002). Alternatives that do not accomplish the purpose of the proposed action are not reasonable and need not be studied. *Id.* at 1031. *See also Westlands Water District,* 376 F.3d at 868 (the "'range of alternatives that must be considered in the EIS need not extend beyond those reasonably related to the purposes of the project.'") To be sure, "alternatives that do not accomplish that purpose or objective . . . are not 'reasonable.'" *Citizens' Committee to Save Our Canyons, at 1031.*

The legal principle that alternatives that do not accomplish the purposes or objectives set forth in the statement of purpose and need are not reasonable is generally applied by the courts in the context of a project opponent arguing that other alternatives were identified or not subjected to adequate study. The requirement that reasonable alternatives must be based on the discussion of purpose and need also means that the preferred action selected by the agency must also correspond to an identified purpose or need and it must also be analyzed as an alternative.

A viable but unexamined alternative renders an environmental impact statement inadequate. *Muckleshoot Indian Tribe*, 177 F.3d at 814. Consideration of viable alternatives is a prerequisite to ensuring agencies take a "hard look" at the environmental consequences of their actions and so decision makers can appropriately make informed decisions. *Id.*

An EIS must also "[p]resent a comparison of the environmental impacts of the reasonable alternatives, and include the no action alternative." WAC 197-11-440(5)(b)(ii). The discussion of alternatives in an EIS need not be exhaustive, but the EIS must present sufficient information for a reasoned choice among alternatives. *Gebbers v. Okanogan County Public Utility Dist. No. 1*, 144 Wn. App. 371, 387-88, 183 P.3d 324 (2008), *review denied* 165 Wn.2d 1004, 198 P.3d 511; *Toandos Peninsula Ass'n v. Jefferson Cy.*, 32 Wn. App. 473, 483 (1982). SEPA also requires a "no action" alternative be evaluated and compared to other alternatives. WAC 197-11-440(5)(b)(ii).

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2. Scope of Review

Under SEPA, environmental review must include consideration of "direct and indirect impacts caused by a proposal." WAC 197-11-060(4)(d). The requirement for disclosure of indirect and cumulative impacts is necessary to comply with the mandate that decisions must be based on "complete disclosure of environmental consequences." *King County v. Washington State Boundary Review Bd. for King County*, 122 Wn.2d 648, 663, 860 P.2d 1024 (1994). "The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants." WAC 197-11-060(4)(e).

While SEPA itself does not define direct, indirect, and cumulative impacts, NEPA does, and these definitions have been borrowed for use in interpreting SEPA. *See Quinault Indian Nation v. City of*

Hoquiam, 2013 WL 6637401 (Shorelines Hearings Board, Dec. 9, 2013) (borrowing NEPA definition of cumulative effects for SEPA analysis of crude-by-rail terminal). Indirect impacts are "caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." 40 C.F.R. § 1508.8(b). Cumulative impacts include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7; and see, *White v. Kitsap Cnty*, SHB No. 09-019 at 17 (2009) (cumulative impacts of a proposed action together with the impacts of pending and future actions should be considered when making a threshold determination). "Proposals are similar if, when viewed with other reasonably foreseeable actions, they have common aspects that provide a basis for evaluating their environmental consequences together, such as common timing, types of impacts, alternatives, or geography." WAC 197-11-060(3)(c)(i). *Id.*

NEPA requires a "useful analysis of the cumulative impacts of past, present and future projects," which requires "discussion of how [future] projects together with the proposed ... project will affect [the environment]." *Muckleshoot Indian Tribe*, 177 F.3d at 810 (*citing City of Carmel*, 123 F.3d at 1160). The court in *Muckleshoot Indian Tribe* rejected a cumulative impacts analysis in an EIS that contained no evaluation of the impact of timber harvest on lands proposed to be transferred to Weyerhaeuser as part of a land exchange, finding the EIS failed to adequately analyze impacts of another "reasonably foreseeable" land exchange. *Id.* at 811-812. The Court ultimately held the cumulative impacts statements in the EIS, relying on "broad and general statements devoid of specific, reasoned conclusions," were "far too general and one-sided to meet NEPA requirements." *Id.* at 811. The Court stated further the analysis fell far short of a "useful analysis" as required by *Carmel*, 123 F.3d at 1160, and *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1214–15 (9th Cir. 1998). 3-4

Similarly, the Court in *Blue Mountains* rejected an Environmental Assessment ("EA") of a timber salvage project covering five discrete forest areas within the Umatilla National Forest because it failed to consider pre-identified timber sales that would result in additional logging elsewhere in the Umatilla National Forest. 161 F.3d at 1215. The Court determined these sales were reasonably foreseeable because they were developed as part of a comprehensive forest recovery strategy and, in fact, were disclosed to a coalition of logging companies before the salvage EA was completed. *Id.* The Court stated, "At the very least, these sales raise substantial questions that they will result in significant environmental impacts. A single EIS, therefore, was required to address the cumulative effects of these proposed sales." *Id.*

It is important to note the distinction between indirect and cumulative impacts. Indirect impacts are those impacts attributable to the project that are not immediate, perhaps induced by the project or an extension of the project. Cumulative impacts include indirect impacts but also impacts to the same or

similar resources from other projects, not just the project under consideration. It is implicit in SEPA that an "agency cannot close its eyes to the ultimate probable environmental consequences of its current action." *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976).

SEPA rules allow for EISs to be conducted in phases in some situations. WAC 197-11-060(5). Such phasing allows an agency and the public to avoid being forced to decide issues that are not ripe for review. WAC 197-11-060(5)(b). However, SEPA requires an agency to identify when it is using phased review. WAC 197-11-060(5)(e); *East Cnty Reclamation Co. v. Bjornsen*, 125 Wn.App. 432, 441 (2005). (holding the project's FEIS was offered as a final document and phased review was not proper so it remanded for unphased review). Phasing is not appropriate when it would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts. WAC 197-11-060(5)(d)(ii); *Indian Trail Property Owner's Ass'n v. City of Spokane*, 76 Wn.App. 430, 443 (1994) (finding initial evaluation of underground fuel storage tanks separate from other phases of proposed shopping facility expansion was erroneous; such phased review was inappropriate because it would serve only to avoid discussion of cumulative impacts).

3-4

Relatedly, when a non-project or programmatic EIS precedes a project EIS, "the EIS on such a project shall focus on the impacts and alternatives including mitigation measures specific to the subsequent project and not analyzed in the non-project EIS. The scope shall be limited accordingly." WAC 197-11-443(2).

SEPA requires a consideration of impacts throughout a wide geographic range. "In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also)." WAC 197-11-060(4)(b). For example, in announcing the scope of the EIS for the Gateway Pacific Terminal (coal export) near Bellingham, Ecology confirmed that the EIS would look at—in addition to the obvious onsite impacts like wetlands fill, habitat loss, and pollution—impacts of increased rail and marine vessel traffic throughout the state and even beyond.

Environmental reviews under SEPA must use sufficient information and disclose areas where information is speculative or unknown. WAC 197-11-080(1), (2). Where there is scientific uncertainty, Washington courts have required agencies to disclose responsible opposing views and resolve differences. These requirements feed into the ultimate standard of review for EISs, that, adequacy is based on a rule of reason, *Cheney,* 87 Wn.2d at 344, and courts require reasonably thorough information disclosure and discussion, good data and analysis to support conclusions, and sufficient information to make a reasoned decision. *Klickitat County Citizens Against Imported Waste v. Klickitat County,* 122 Wn.2d 619, 633 (1993). Sufficiency of the data is also assessed under the "rule of reason," which requires a "'reasonably thorough discussion of the significant aspects of the probable environmental consequences' of the agency's decision." *Weyerhaeuser v. Pierce Cnty.,* 124 Wn.2d 26, 38 (1994) (citations omitted).

In making the similar assessment under NEPA, which again, Washington State courts look to for guidance in interpreting the SEPA, federal courts require agencies to take a "hard look" at environmental impacts. More specifically, for review of NEPA claims, the Court must "ensure that an agency has taken the requisite hard look at the environmental consequences of its proposed action, carefully reviewing the record to ascertain whether the agency decision is founded on a reasoned evaluation of the relevant factors." *Te-Moak Tribe v. Interior*, 608 F.3d 592, 599 (9th Cir. 2010) (quoting *Greenpeace Action v. Franklin*, 14 F.3d 1324, 1332 (9th Cir. 1992) (internal quotation marks and citations omitted)). This review must be "searching and careful." *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 858 (9th Cir. 2005). It also is guided by a "rule of reason" that asks "whether an EIS contains a reasonably thorough discussion of the significant aspects of the probable environmental consequences." *Churchill County v. Norton*, 276 F.3d 1060, 1071 (9th Cir. 2001), amended by, 282 F.3d 1055 (9th Cir. 2002). Under NEPA, courts have held that an agency cannot rely on "stale" scientific evidence or "ignore reputable scientific criticism" in EISs. *Seattle Audubon Soc. v. Espy*, 998 F.2d 699 (9th Cir. 1993); *Carmel*, 123 F.3d at 1151. 3-4

Washington Courts have employed the "hard look" doctrine directly or in other cases have required full disclosure and consideration of environmental values. *See Pub. Util. Dist. No. 1 of Clark Cnty. v. Pollution Control Hearings Bd.*, 137 Wn. App. 150, 158, 151 P.3d 1067, 1070 (2007); *Toward Responsible Dev. v. City of Black Diamond*, 179 Wn. App. 1012 review denied, 180 Wn. 2d 1017, 327 P.3d 54 (2014) (unpublished opinion) ("Courts review an EIS as a whole and examine all of the various components of [the] agency's environmental analysis ... to determine, on the whole, whether the agency has conducted the required 'hard look.'"); *see also Coalition for a Sustainable 520 v. U.S. Department of Transportation*, 881 F. Supp. 2d 1243, 1259 (W.D. Wash. 2012) (holding implicitly that "hard look" under NEPA sufficient for SEPA review). Where "hard look" is not discussed or employed directly, courts have required a "reasonably thorough discussion" of environmental impacts. *See Toward Responsible Dev. v. City of Black Diamond*, 179 Wn. App. (2014); *PT Air Watchers v. State, Dep't of Ecology*, 179 Wn. 2d 919, 927, 319 P.3d 23, 27 (2014) (citing *Norway Hill*, 87 Wn.2d at 275) (requiring "full disclosure and consideration of environmental values"). When information is either misrepresented or not materially disclosed, a supplemental EIS is required.

3. SEPA Requires Mitigation Measures Be Included

Mitigation measures must be identified and analyzed in sufficient detail for the public and agencies to make judgments about the quality and quantity of mitigation, whether it will be sufficient for the harm it is intended to address, and whether it will address the harm within the relevant timeframe. Knowing these details is critical for the decision-maker because, if an EIS cannot adequately identify and describe mitigation measures in sufficient detail to demonstrate that significant environmental impacts

of a proposed project can be adequately mitigated, the decision-maker should, under SEPA, deny permits for the project.

Mitigation measures, in order to be considered as valid mitigation of adverse environmental impacts, "shall be reasonable and capable of being accomplished." *Anderson v. Pierce Cty.*, 86 Wn.App. 290, 301 (1997) (citing *Kiewit Const. Group, Inc. v. Clark Cty.*, 83 Wn.App. 133, 143 (1996)). *See also, Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1380-81 (9th Cir. 1998). A simple list of mitigation measures is not adequate, nor is a perfunctory discussion of what might happen with mitigation. *Id.* An essential component of any discussion and analysis of mitigation measures is a full assessment of whether, when, and to what extent, a measure will be effective. *South Fork Band Council of Western Shoshone of Nevada v. U.S. Dep't of Interior*, 588 F.3d 718, 727 (9th Cir. 2009). *Cf. Okanogan Highlands Alliance v. Williams*, 236 F.3d 468, 474-75 (9th Cir. 2000) where the court found mitigation discussion adequate where mitigation measures were set forth in detail, each measure received an "effectiveness rating" for how it would address the impact, listed steps for assessing and applying each mitigation measure and discussed how the mitigation measure would address each of the specific impacts. As the court noted, this is necessitated by the "hard look" requirements of NEPA.

Further, it must be clear that mitigation is separate and distinct from alternatives. Under SEPA, an EIS must "[c]learly indicate those mitigation measures (*not described in the previous section as part of the proposal or alternatives*), if any, that could be implemented or might be required..." WAC 197-11-440(6)(c)(iii) (emphasis added). Alternatives and mitigation are further defined in the regulations as separate and distinct concepts. *See* WAC 197-11-768 and 786. The section of an EIS that includes analysis of mitigation measures is "not intended to duplicate the [alternatives] analysis in subsection (5) and *shall avoid doing so to the fullest extent possible*." WAC 197-11-440(6)(b)(iii) (emphasis added);*see also, Citizens for Safe and Legal Trails v. King County*, 118 Wn. App. 1048 (2003). 3-4

4. Cost Considerations Are Necessary to Inform Decision Makers

Though a full cost-benefit analysis is not required under SEPA (WAC 197-11-450), SEPA contemplates "that the general welfare, social, economic, and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. WAC 197-11-448(1). This is because an EIS is a tool "upon which the responsible agency and officials can make the balancing judgment". *Id.* This regulatory language has been interpreted to mean that factors other than environmental factors, such as economic considerations, may drive the ultimate decision on a project proposal. *See Solid Waste Alternative Proponents v. Okanogan Cty.*, 66 Wn. App. 439, 443, 832 P.2d 503, 506 (1992) ("The environment is an important and necessary consideration in the process of situating a landfill, but it is not the only consideration."). The EIS must provide enough information so that there is a reasonable "basis upon which the responsible agency and officials can make the balancing judgment mandated by SEPA." *Id.* Further, SEPA requires that "environmental amenities

and values will be given appropriate consideration in decision making along with economic and technical considerations." RCW 43.21C.030(2)(b). Additionally, SEPA requires discussion of significant impacts include the cost of and effects on public services, such as utilities, roads, fire, and police protection, that may result from a proposal. WAC 197-11-440(6)(e). 3-4

5. Cultural and Historic Resources Must Be Considered

When it adopted SEPA, the Legislature recognized the importance of preserving "important historic, cultural, and natural aspects of our national heritage." RCW 43.21C.020(2)(d). Accordingly, SEPA requires EISs to analyze impacts to historic and cultural resources. WAC 197-11-440(6)(d)(iv); *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d 619, 642 (1993).

6. Cumulative Impacts Must Be Considered

SEPA requires that an EIS must fully evaluate all of the direct, indirect, and cumulative impacts of projects. WAC 197-11-792(c). Implicit in the statute is the requirement that the decision makers consider more than what might be the narrow, limited environmental impact of the immediate, pending action. The agency cannot close its eyes to the ultimate probable environmental consequences of its current action." *Cheney v. City of Mountlake Terrace*, 87 Wash. 2d 338, 344, 552 P.2d 184, 188 (1976).

C. Technical Comments

As explained below, the Tribe believes the DEIS for the Project fails to meet the legal requirements of SEPA in various ways. Numerous adverse impacts are not fully analyzed or are addressed in a conclusory manner in the DEIS. Further analysis is required before issuance of a Final EIS or the City should exercise its substantive authority under SEPA and deny permits and authorizations required for the Project to move forward.

1. General Comments on the DEIS

The action alternatives that are analyzed are substantially similar. The DEIS should include at least one alternative that seeks to maximize environmental benefits while still meeting the project's intent and purpose. An environmental alternative would provide more buffer to the Snoqualmie River by re-aligning Mill Pond Road further landward than is proposed in the current alternatives. 3-5

The Plan requests approval for all three planning areas with little to no information on what Planning Areas 2 and 3 will look like. This is concerning because there is nothing to prevent the alternatives outlined from being reintroduced as part of Planning Areas 2 and 3 later on down the road. The outdoor venue is only listed in the alternative Plan, but there is nothing stopping the applicant from 3-6

pursuing this option once the Plan is approved. It is recommended that the applicant submit detailed plans of what will and will not be allowed in the Planning Areas 2 and 3. 3-6

The Plan requires that other entities build the infrastructure to support the expected growth in the planning areas. The Plan admittedly states that the existing infrastructure is insufficient to support the amount of people working and living in the proposed growth areas, and yet, there is an expectation that the work to improve the roadways and infrastructure will be absorbed by the local government agencies. 3-7

The Plan states that the increases in population and housing associated with the Plan are not considered significant impacts. This is very inaccurate based on the information provided. There needs to be more input from not only the Tribe, but also the general public. The impact to the downtown areas will be substantial. The impact to the neighborhoods in the downtown area needs to be considered. 3-8

Due to the Snoqualmie Mill Site's location in the Snoqualmie River floodplain, and adjacent to the Snoqualmie River, the site comes with unique opportunities and obligations. These are not fully nor adequately acknowledged in the DEIS, which should include an alternative which maximizes environmental benefits such as flood storage, aquifer recharge, channel dynamism and deformability, and riparian buffer enhancement. 3-9

The action alternatives that are analyzed are substantially similar. The DEIS should include at least one alternative that seeks to maximize environmental benefits while still meeting the Project's intent and purpose. An environmental alternative would provide more buffer to the Snoqualmie River by re-aligning Mill Pond Road further landward than is proposed in the current alternatives.

Finally, there is no mention of COVID-19 prevention and precautions. Understandably, this Plan was submitted before the COVID-19 pandemic. However, the Final EIS needs to clearly address what measures the developer will take to ensure social distancing and prevent exposure to and spreading of the virus in light of the pandemic and evolving science which reflects that the virus may be with us for some time. 3-10

For convenience, the Tribe addresses its concerns by each section, as set forth below.

2. Section 3.1, Earth Sciences

In this section, the two biggest concerns are that the site is located on soils that would cause sinking in the event of an earthquake, and the site is located within the floodplain of the Snoqualmie River. The site is underlain by alluvial sediments and steep slopes in some areas, making it susceptible to liquefaction during an earthquake, and thus, landslides. The Plan states that the low strength of the 3-11

existing fill and lacustrine sediments, and the lower-lying parts of the site could be susceptible to failure by lateral spreading during a seismic event, even on relatively gently inclined slopes.

The Snoqualmie area has experienced an increase in seismic activity through the last few years and it is anticipated that a large earthquake could strike this area. The Plan needs to account for this and provide information on how it will reduce risks from landslides that result from earthquakes. Landslides have the potential to negatively impact the Snoqualmie River and the shoreline of the Mill Pond. This is particularly of concern for native fish and wildlife. 3-11

3. Section 3.2, Air Quality

The section on air quality does not provide any data of significance. Air quality issues from construction vehicles and vehicle delays is minimized, as are air quality issues relating to the event space and the wineries. Previous chapters suggest that this section will contain data and planning documents, but nothing of the sort is provided.

This proposed project spans from 2022 to 2032, a period of 10 years (assuming all goes as planned) with some breaks in between planning areas. There is nothing temporary about the increased air pollution associated with sand and gravel trucks, heavy machinery, and work trucks going throughout the sites and through downtown Snoqualmie and the adjoining areas.

For example, the DEIS states that the development "could result in temporary, localized increases in particulate concentrations due to emissions from construction-related sources" (3-33). Additionally, the DEIS states that odors associated with paving operations that involve using tar and asphalt, any odors related to construction would be short-term and would likely go unnoticed. (3-34). The DEIS also states that emissions from existing transportation sources around the project "would likely outweigh any emissions resulting from on-site construction equipment." (3-33). There is no real data to support these assertions. 3-12

Construction contractors could minimize emissions from diesel-powered construction equipment, to the extent practicable, by taking steps such as implementation of best management practices that would reduce emissions related to the construction phase of the project. Management practices for reducing the potential for air quality impacts during construction include measures for reducing both exhaust emissions and fugitive dust. The Washington Associated General Contractors brochure, *Guide to Handling Fugitive Dust from Construction Projects* and the PSCAA suggest several methods for controlling dust and reducing the potential exposure of people to emissions from diesel equipment.

The Plan states that future CO concentrations would decrease due to adoption of "newer, more efficient vehicles and cleaner fuel regulations." (3-38). There are no data or studies to illustrate that

newer vehicles with lower emissions will balance out the tremendous traffic increase from the construction, new jobs, residents, and visitors of the 12 wineries. This also does not take into account existing air quality issues during hot, summer months when inversions occur. This section does not quantify or consider any potential efforts to reduce either GHG emissions or resource consumption by incorporating sustainable features into the development. (3-40). If the goal is to minimize emissions, the Plan should incorporate mitigating factors such as bicycle use and park and rides to minimize the amount of traffic at the site. 3-12

Current SEPA policy requires projects to report an estimate of lifecycle GHG emissions associated with a project. That is completely lacking here. There is also nothing in place to monitor air quality and GHG. In the summer, ozone can spike with temperatures as well as when inversions occur there is stagnant air that can keep pollutants trapped locally. 3-13

There is a concern regarding air quality issues and public health risks associated with asbestos at the site. If asbestos is found, demolition contractors would be required to comply with EPA and PSCAA regulations related to the safe removal and disposal of any asbestos-containing materials." There is no mention about disposal of asbestos. If asbestos is present there needs to be a Plan for disposing it and treating it safely. Asbestos testing should occur before any development begins. 3-14

There is no specific mention of using Green Building techniques to help reduce the contributions to climate change. Examples include: reducing water and energy consumption; minimizing greenhouse gas emissions; using eco-friendly building materials; decreasing landfill waste, and enhancing the natural environment with trees, green roofs, and community gardens. There is mention of establishing a goal of LEED gold or platinum certification to achieve energy sufficiency, but then it is not discussed further. 3-15

Some of the numbers do not add up. For example, Exhibit 3.2-1 (AM Peak-Period Signalized Intersection Conditions) shows that the peak period delays are currently 17.8 seconds at the Meadowbrook Bridge. However, the delays for the PCI Plan 2023 with Planning Area 1 shows that this delay will actually decrease at the same intersection from 17.8 to 16.1 seconds. This is contrary to the rest of the numbers, and does not add up since there will be a substantial increase with traffic. 3-16

Additionally, the AM delay for SR-202 and Snoqualmie Parkway is currently at 13.7 seconds. The proposed full build increases that delay to 59.2 seconds, which has the potential for a significant increase in emissions. The AM peak-period traffic conditions were used to screen for CO air quality impacts where concentrations might exceed the health-protective ambient air quality standards (3-35). However, the traffic is far worse in the evening and if there are wineries and residences adding to this, the air quality impacts will be measurable and adverse.

4. Section 3.3, Water Resources

The DEIS fails to fully recognize the significance and adverse implications of the Mill Site's proximity to the Snoqualmie River, the Mill Site's presence in the floodplain, and important, applicable reports such as the 2011 *Snoqualmie River Temperature TMDL and Implementation Plan* (Washington State Department of Ecology). The failure to address these significant environmental impacts does not constitute full disclosure under SEPA. See RCW 43.21C.031(1). Rather, this section minimizes the environmental consequences to water resources by failing to provide more alternatives that are less destructive, and by failing to capture the full range of environmental conditions. This section does not present a complete picture of the environmental impacts to water resources, nor does it present sufficient data or evidence to fully inform the public - both which are requirements under SEPA. By failing to provide data and information for a full build-out, there is no conceivable way to measure the impacts to water resources. 3-17

In particular, please note the following:

- P. 3-46 "The Snoqualmie River is designated as a direct discharge receiving water body by the KCSWDM and the Ecology Manual, thus the site is exempt from flow control requirements." Regardless of the manuals' exemptions from flow control requirements, due to its location and size, and the extremely sensitive natural and social environment regarding flooding in the Snoqualmie Valley, the proposal should maximize opportunities for flow control, and must maintain water quality by treating all stormwater discharged from the site. The DEIS should provide more alternatives that further identify opportunities to improve flood storage, increase aquifer recharge (using treated runoff), and improve water quality. 3-18
- P. 3-47 "Borst Lake is a man-made lake created and maintained for milling operation." Borst Lake is a natural oxbow floodplain feature that has been modified. 3-19
- P. 3-55 "These data show water quality conditions in each of the forks to be of high quality given they originate from relatively undeveloped watersheds upstream of this point. The Water Quality Index for Streams and Rivers provides an index that combines multiple parameters for an overall rating. Each of these forks are rated as "Low Concern" for water quality degradation over time. (King County, 2019)" The EIS should further discuss the two TMDLs that have been prepared for the Snoqualmie River. The *2011 Snoqualmie River Temperature TMDL and Implementation Plan* is especially relevant, but unfortunately, while "TMDL" appears in the list of abbreviations and acronyms in the DEIS, it appears nowhere else including in any of the appendices. This is a significant oversight and should be corrected. 3-20

Radaeke's Appendix C does not mention the TMDL but does acknowledge on p. 51 that "Potential water quality impacts from the treated stormwater within Planning Area 1 that will be discharged into the Snoqualmie River at this location would be predominately related to warmer temperatures of stormwater runoff from developed surfaces compared with river temperatures." This concern is not

addressed in Appendix A Master Drainage Plan. The Project should do its part to address and to reduce this impact, through infiltrating treated stormwater, and/or other means.

3-20

The DEIS requires more discussion of the Snoqualmie River Temperature TMDL. The EIS should more transparently address temperature impacts to water quality, and explicitly explain how the drainage plan will meet (or better yet beat) the required Waste Load Allocation for temperature of stormwater discharge. What is being done in regards to shading, and especially infiltrating treated impervious area runoff, to avoid discharging warm water?

- P. 3-55 "Water quality samples of surface water were taken at three locations onsite on December 18, 2017 from streams S-1 and S-2 (refer to Exhibit 3.4-4)." The temporally limited sampling effort may not be reflective of the full range of environmental conditions as they vary annually. Samples should come from different seasons, especially during the June-July-August and Sept-Oct-November critical periods. The study would also benefit from including additional sample sites that reflect a broader range of potential habitat and flow conditions and enable more thorough coverage of a large, contaminated site. 3-21
- P. 3-65 "Substantial portions of stormwater runoff from Planning Area 1 would be routed directly to the proposed direct discharge outfall to the Snoqualmie River." We encourage inclusion of an alternative to analyze the use of an enhanced GSI/LID treatment train for water quality treatment and improved on-site retention/infiltration, to eliminate any discharge to the greatest extent practicable. 3-22
- P. 3-75 "Clearing vegetation and replacing it with suburban landscaping (such as lawns) reduces evapotranspiration, increasing the amount of water available for groundwater recharge and runoff." No citation provided. This statement is highly dependent on the types of vegetation cleared and replaced, the irrigation techniques applied to the replacement vegetation, and any delta between the two would likely vary seasonally. Lawns are generally recognized to be more water-intensive than native, drought-adapted vegetation which is typically not irrigated. The discussion of various actions' effects on groundwater recharge lacks realistic nuance and makes too many sweeping statements that neglect to account for factors such as varying rates of evapotranspiration relative to stand age and species composition, and irrigation practices. 3-23
- Re. Planning Area 1 stormwater: An Environmental Alternative could relocate Mill Pond Road and any proposed traffic controls like roundabouts further landward. The existing roadway footprint could be converted to riparian shoreline buffer and/or a site for enhanced water quality treatment for Planning Area 1. 3-24
- P. 3-78 Re. Plan for dog walking near the RV spots: Based on experience with RV parking in the region, in order to protect water quality, provide a designated, signed dog walk area with waste bags and receptacles. Install dense plant barriers (e.g. rose, gooseberry) to keep dogs out of natural and water quality treatment areas. 3-25

- P. 3-80 "However, given the relatively small volume of runoff compared with flow volumes in the river, changes in water temperatures within the river are not expected to adversely affect aquatic life." This statement is contrary to the findings of the Temperature TMDL. The City should not permit any further incremental environmental degradation. Aquatic resources in the Snoqualmie River, including ESA listed fish populations, continue to decline, in part due to environmental degradation which has resulted in river temperatures which regularly occur at levels and frequencies that may threaten aquatic life (see *Hot Water and Low Flow*, King County 2016, https://your.kingcounty.gov/dnrp/library/2016/kcr2750/kcr2750-txt.pdf, and *Snohomish Basin Protection Plan*, Snohomish County Surface Water Management, King County Snoqualmie Watershed Forum Staff, Tulalip Tribes Natural Resources Department, 2015, https://snohomishcountywa.gov/ArchiveCenter/ViewFile/Item/4402). Both of these reports, and others, specifically identify water temperature above Snoqualmie Falls as a leading stressor. The PCIP must ensure that it will not discharge any amount of warm water that will contribute to the Snoqualmie River temperature issue. Technology exists to accomplish this goal; all that is needed is the will and commitment to invest in the future of the Snoqualmie's aquatic resources. 3-26
- P. 3-83 "The ultimate plan for mass grading includes more than simply demonstrating that equivalent compensating storage has been provided in the floodplain. The open space grading is proposed in a manner to improve the path of floodwaters back to the river as the flood recedes." In a broad sense, what the Snoqualmie Valley needs is not a more direct path for floodwaters to further inundate already flooded areas. What the Valley needs are opportunities to beneficially retain more floodwaters, and slowly release them, ideally through improving natural floodplain processes and functions. An alternative should be provided that includes more features to maximize these processes and functions. 3-27
- P. 3-84: Re. flood storage credit for stormwater ponds: Since we can assume these facilities will usually be full, i.e. spilling, during flood events, it is important to confirm that this was correctly accounted for and calculated. Please see detailed comment regarding Appendix A below.
- 3-84: "The stormwater management plan for the project site proposes to discharge to the Snoqualmie River, conveyed from the site through storm pipes to a broad surface swale that will be constructed along a portion of the new Mill Pond Road. As the site continues to develop, potential cumulative impacts include erosion along the swale or along the system of wetlands and streams if significant flows are routed to these features, or if the base or side slopes are not properly protected with vegetation or constructed of stable material." This exposes the deficiency of the DEIS in only planning for one portion of the site. The PCIP should much more fully plan for build-out now, since that is ultimately the concept and goal. The stormwater plan should be robust enough so that facilities will not subject to erosion at any level of development, as is described as a possibility above. 3-28
- P. 3-85: "Maintain relatively low density of impervious surface coverage for the site (approximately 59% open space, if landscaped open space is excluded) and create the ability to 3-29

promote groundwater recharge." Promotion of GW recharge needs to be re-examined more completely and realistically.

- P. 3-85: "Create a stormwater and flood flow outfall to the Snoqualmie River to promote a flow path of receding floodwaters back to the river to reduce potential property or roadway damage in future flood conditions." Since downstream (and to some extent, upstream) areas are already experiencing regular, serious flood impacts that threaten habitat and safety, the EIS should include an environmental alternative that maximizes improvements in flood storage at the site. 3-30
- P. 3-86: "Maintain flows to surface water dependent wetlands and streams to provide recharge to the shallow aquifer." This is more accurately characterized as a requirement, rather than a mitigation measure. Groundwater alone is unlikely to preserve the habitat and functions of Wetland 12; it should retain its current fraction hydrologic contributions from surface water.
- P. 3-86: "Significant Unavoidable Adverse Impacts" As described above, this depends on development levels of future phases. Additionally, any additional temperature impacts to the Snoqualmie River can be considered significant due River's regular non-attainment of WQ temp stds.
- P, 3-86: "...no significant unavoidable adverse impacts to water resources are anticipated." As described above, the accuracy of this statement is highly conditional on how future phases are developed. Additionally, any additional temperature impacts to the Snoqualmie River should be considered significant, due to the River's regular non-attainment of water quality temperature standards, and said non-attainment's effect on threatened aquatic resources such as Puget Sound chinook and other native coldwater fishes. 3-33

5. Section 3.4, Plants and Animals

This section fails to consider the direct and indirect impacts to plants and animals caused by the planned areas, development, and construction. Animals will be displaced by activities and development at the site, which the DEIS does not adequately explore. The substantial increase in traffic at the site – both throughout the construction phases and after the wineries, developments, and residences open – will result in disturbance and trauma to local populations of native elk, cougar, black bear, and eagles. Further, there is no discussion of maintaining and establishing the required minimum buffers to protect native plants and to prevent erosion. The information provided in this section is insufficient to support the assertion that the PCIP will not cause significant impacts to plants and animals. 3-34

Additionally, the Tribe offers the following comments concerning DEIS Section 3.4:

- P. 3-87: "Vegetation along the right bank of the Snoqualmie River adjacent to the project site consists of a mix of 30- to 50-year-old deciduous forest and areas dominated predominantly by Himalayan blackberry (*Rubus armeniacus*, FAC)." This forest would be more accurately 3-35

characterized as a mixed deciduous forest with some coniferous and evergreen specimens exceeding 50 years old. 3-35

- P. 3-96: "...water quality in the stream is poor and the stream may not support fish." Clarification is needed to support this statement. For which water quality parameters is the stream classified as poor? Are they parameters which directly affect fish life? If not, the statement should be revised. Regardless, since the stream is assumed to support fish per the report and the footnote, the speculative commentary should be removed. 3-36
- P. 3-96: "Off-site riparian and instream habitat associated with the Snoqualmie River is located in the vicinity of the SR 202 bridge across the Snoqualmie River." The DEIS should discuss options to improve riparian habitat by relocating SE Mill Pond Rd further landward. 3-37
- P. 3-110: "Therefore, significant adverse impacts would not occur to the hydrologic functioning of Wetland 12NW and 12W from development of Planning Area 1." More analysis is needed. Timing and duration of inundation is likely to change as a result of development. The EIS should include more complete information on how the hydrologic changes may affect plant communities and amphibian habitat. 3-38
- P. 3-111: Re. "Loss and Degradation of Habitat": More discussion is needed on the effect of the increase in amount of human traffic. This site overemphasizes the activities on adjacent sites, and neglects the fact that the subject site itself is extremely large, and as a large quiet site, currently functions as a wildlife refuge from those activities such as sand and gravel trucking and rally school racing, which occur on adjacent sites. Animals will be displaced by activity and development of the site, and this is not explored transparently in the DEIS. 3-39
- P. 3-116: "Development of Planning Area 1 would result in similar levels of disturbance to the elk, including rally car activities, to which the elk are now habituated, but with less refuge habitat on site." This means they will be displaced. More discussion is needed. 3-40
- Re. Construction Impacts, more discussion is needed. This section does adequately discuss the impacts of construction noise and activity on animal movements and behaviors. 3-41
- P. 3-116: "Floodplain Habitat Impacts" is remiss in that it does not include discussion of floodplain processes such as channel migration. Historic channel migration in the Snoqualmie floodplain is evident in meander scars on the Mill Site and adjacent to it. 3-42
- P. 3-116 "Compared to existing conditions, impervious area would increase in Planning Area 1 but would decrease in Planning Areas 2 and 3." This statement cannot be known since the DEIS does not Plan for development Planning Areas 2 and 3, other than a concept and ultimate goal. This happens to also be one of the DEIS's primary shortcomings. 3-43
- P. 3-117 Re. Riparian Vegetation: This section should discuss Snoqualmie River riparian habitat and options to set back SE Mill Pond Road further landward.
- P. 3-117 "In addition, the existing SE Mill Pond Road lies adjacent to the Snoqualmie River shoreline. The portion of the road adjacent to Planning Area 1 is proposed to be reconstructed farther from the shoreline, with the existing roadbed decommissioned and restored to riparian vegetation." The EIS should include an alternative which maximizes riparian setbacks from the 3-44

Snoqualmie River, in accordance with the Snoqualmie River Temperature TMDL and other recommendations. At a minimum, 165 feet from channel should be considered Riparian, but notably, current WDFW PHS guidelines indicate floodplain extent as the riparian buffer extent in this landscape setting. 3-44

- P. 3-118 Re. Hyporheic Zones: The EIS should provide an alternative that enhances hyporheic function, i.e. a bigger setback from the Snoqualmie River.
- P. 3-118 Re. Large Woody Debris (LWD): An alternative including a bigger setback from the river would enhance potential for LWD recruitment. The entire site lies within the historic meander zone of the Snoqualmie River, as indicated by ancient channels scars visible in orthophotos and LIDAR imagery. 3-45
- P. 3-119: "Wetland hydrology and water quality would not be significantly affected." See comments above re. wetland hydrology. More analysis is needed. Contributions of surface water hydrology must be preserved. 3-46
- P. 3-119: "...discharge a relatively small volume of slightly warmer runoff water into the Snoqualmie River, which is not expected to adversely affect aquatic life in view of the volume of water in the river." See comments above re. the TMDLs and other reports and studies that clearly show that any further detrimental temperature impacts threaten the viability of sensitive aquatic resources. 3-47
- P. 3-119: "...eliminate existing vegetation and elk habitat in an area highly used by elk in the far western corner of the property south of the existing haul road. However, development of Planning Area 1 would retain much of the vegetated areas that are most used by elk in the southwestern part of the site." This means elk will be displaced. A discussion of the short and long term effects of cervid displacement is warranted. 3-48
- P. 3-119: "Existing buffers for all wetlands within Planning Area 1 are degraded at varying levels and it is unlikely that the onsite wetland buffers within Planning Area 1 or the off-site buffer for the right bank of the Snoqualmie River in the vicinity of the proposed road re-alignment provide more than a range of de minimis to low levels of protection of water quality or habitat functions to onsite wetlands or the Snoqualmie River." The Snoqualmie River needs minimum 165' buffers. These buffers should be enhanced to shield the river and riparian and wetland habitat from increased traffic and activity. 3-49
- P. 3-121 Please provide more information on the wildlife crossing underpass depicted in the drawing. 3-50
- P. 3-125 "The transition to a mixed-use employment center with greater buildings and impervious area could cumulatively contribute to a reduction of wildlife habitat and a transition to species more adapted to urban development in the city and its UGA. The Proposal's contribution to cumulative impacts is partially offset by an onsite wildlife corridor." The alleged corridor does not provide passage through the site, but shunts wildlife to a narrow band of wetland and wetland buffer sandwiched between an extremely busy trucking route and the active proposed development. The transition will reduce wildlife habitat and will increase cumulative impacts. 3-51

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Species such as elk and bear will be displaced and may cause impacts in currently developed areas. 3-51

- P. 3-127 "No Action Alternative" should add: "No currently occupied habitat would be destroye and the animals occupying it would not be displaced." 3-52
- P. 3-132 "Other Potential Mitigation Measures" should consider a165 foot buffer for the Snoqualmie River. The DEIS should include an alternative that maximizes environmental bene 3-53
- P. 3-133 "Local populations of most native wildlife species on the site would be reduced upon development of Planning Area 1, at least until the central on-site habitat corridor can be established." Much is made of the benefits of the corridor, but the DEIS does not include suffici detail about the location and other key characteristics of the corridor. The EIS should include more explicit plans. 3-54

6. Section 3.5, Environmental Health

The biggest environmental concern is that Planning Areas 2 and 3 have known contamination in excess of MTCA cleanup levels. The Plan vaguely states that this will be addressed, but it is unclear why any development would be proposed without undertaking such a cleanup first. While efforts have been made to begin cleanup in Planning Areas 2 and 3, the extent of the cleanup remains unknown and nothing in the DEIS or its appendices reference the cleanup plan that is currently in place. Further, it remains unclear whether the developer intends to work with the previous owner in its plans to clean up the property, or whether the developer intends to pursue this on their own. Regardless, the cost of cleanup and the expected amount of time that will be required to complete cleanup are not discussed. 3-55

Prior to doing any development of Planning Areas 2 and 3, additional remedial actions are needed to characterize the nature and extent of the contamination and then identify and evaluate cleanup actions. Monitoring wells are needed for Planning Area 1 so that if development occurs in Planning Area 2 and 3 the migration of contaminants with groundwater can be monitored.

The information provided in this section does not inform decision makers about the additional time that the cleanup may take, and is written to assume that cleanup will take place in conjunction with the development. The extent of the cleanup remains unclear and could add several years to the construction and development of Planning Areas 2 and 3. Without a detailed cleanup plan, any development within Planning Areas 2 and 3 is unknown.

7. Section 3.6, Land and Shoreline Use

This DEIS facilitates taking an otherwise abandoned and quiet property and turning it into a bustling and busy area. There would be greater customer and tourist visitors visiting, especially with 12 proposed wineries. There will be an event venue, and the proposed alternative Plan proposes an outdoor 3-56

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event venue on a 3.7-acre open space. At this time, the plans for Planning Areas 2 and 3 are unknown, and these areas require substantial environmental cleanup before anything can be developed. The vagueness of the Plan for Planning Areas 2 and 3 is concerning because it is difficult to evaluate the highest-impact scenario. The use of these areas for an outdoor concert venue would be the worst-case scenario in terms of land use, traffic, and noise. The Tribe recommends that there are limitations in place for what can be placed in Planning Areas 2 and 3. For example, if the Plan is accepted "as is," then an outdoor venue space should not be permissible in Planning Areas 2 or 3. 3-57

8. Section 3.7, Consistency with Plans and Policies

Of concern with this section is that the Plan would not provide opportunities for environmental enhancement (e.g. wetland buffer enhancement and remediation of past legacy). There are no structures proposed in the Urban Conservancy designation other than circulation and parking, which are not consistent with open space, park, low intensity recreation, and low intensity agricultural uses consistent with effective environmental management of the largely undeveloped portions of the floodway and other critical areas. Circulations and parking areas are developments, not undeveloped areas. They certainly do not support critical areas. 3-58

The Plan purports to retain 2/3 of the overall site as open space, landscaping, and compensatory flood storage. However, there are no plans for Planning areas 2 and 3, which makes it difficult to make this assertion. 3-59

The Plan states that it will provide flexibility from fixed, quantitative standards. One of the most productive things that could be implemented is to provide more room between the development and the river, for a minimum of 165 feet. 3-60

The City of Snoqualmie's Comprehensive Plan documents areas of prior unpermitted fill at the Mill Site, and states that removal of this fill will be required before development (See Comp Plan at 7-13, "Land Use"). The Plan and the DEIS do not make clear how the development will comply with this directive. Are the applicant's flood calculations predicated on a faulty baseline? 3-61

9. Section 3.8, Population, Housing and Employment

The housing Plan falls short of the City's own goals of providing affordable housing. According to the Comprehensive Plan (Table 4.14) the target number for affordable housing households is 2,428 by 2032, and should be 1,504 based on the 2010 census data. Tribal members and staff alike are priced out of this region and there should be a greater emphasis on providing affordable housing. Also, this Plan assumes that the average household will only have 1.9 people. This is in contrast to the US Census data from 2014-2018, which provides that the average household in Snoqualmie is 3.09. 3-62

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Of the proposed 160 multifamily housing units would be constructed in Planning Area 1, there are no housing units that will be low-income. The Plan states that there would be an increased demand for new housing, including affordable housing, which would increase development pressures on surrounding properties. Rather than introducing low-income housing, this shifts the burden on other developments in the area. The Snoqualmie Comprehensive Plan requires affordable housing be provided in new mixed use, planned residential, and innovative district projects, to the extent feasible. This Plan fails to account for such housing. The housing units should address the housing needs of the community. 3-63

10. Section 3.9, Aesthetics, Light, & Glare

The Plan proposes that building heights will be up to 55 feet in height in Planning Areas 1, 2 and 3. This is taller than the current 40-foot height limit in the PCI zone. This height increase will require a deviation from the current zoning standard. This is not consistent with the adjoining landscape and creates aesthetic issues for those living in the area that wish to preserve the existing charm and character of the adjoining areas. The Plan also fails to mention why such a height deviation is necessary. 3-64

The studies in this section are too minimal, and should include more locations. The studies should include the Two Sisters Return and the recently transferred Salish Expansion properties. Other areas to consider include other areas from downtown Snoqualmie, such as River View Park, the dog park, from the residential neighbors, and from King County Parks land. Additionally, the opening paragraph in this section should mention that Rattlesnake Mountain and Mount Si are important to the Tribe, in addition to the Snoqualmie Falls. 3-65

This section should consider include impacts during different times of the year. For example, during the late summer and through the fall there is an increase in light and glare through downtown produced by noise and light from the high school football field. 3-66

11. Section 3.10, Historic & Cultural Resources

Under SEPA, all agencies of the state have the responsibility to "use all practicable means, consistent with other essential considerations of state policy, to improve and coordinate plans, functions, programs, and resources...to preserve the important historic, cultural, and natural aspects of our national heritage." RCW 43.21C. Historic and cultural preservation are to be considered to "avoid, minimize, or compensate for loss, changes to, and disturbance to resources." (WAC 197-11-960(13)). This section is missing a full report that includes all of the potentially disturbed areas for the overall project, which would include Planning Areas 2 and 3. 3-67

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Additionally, the section has limited information regarding the Tribe, and includes various errors. For example, the term "Snoqualmie Nation" is used throughout the report; the correct legal name is "Snoqualmie Indian Tribe." The TCP section only includes information that was included in the NRHP nomination form and no other input from the Tribe regarding the significance of the Snoqualmie Falls. 3-68

There are no modern Tribal citations used for the ethnographic information – just the same 100-year-old information. There are numerous archeological sites within a 0.5 – 1 mile radius that could be affected by this project, and there is no mention of the impacts to them in the DEIS. Further, the archeological work was completed only over a two-day period, and was only for Planning Area 1. A full report needs to include all of the potentially disturbed areas for the overall project, which would include Planning Areas 2 and 3. 3-69

12. Section 3.11, Transportation

This section of the Plan is lacking mitigation efforts to minimize the adverse impacts to environmental quality. Reasonable alternatives such as park-and-rides, shuttle services, and bicycle access, need to be explored. At this time there are no reasonable alternatives provided to the expected traffic ramifications that this project will have – both during construction and after development. This section outlines many adjoining roadways that need to be improved for this project to be successful, but the section lacks providing the alternatives required under SEPA. 3-70

The traffic/construction/ramifications of a 10-15 year project will be substantial. Construction vehicles of all sizes, and sand and gravel trucks will be infiltrating Snoqualmie roads, causing traffic delays in an already overburdened area. There is little mention of dust control or the impacts this could have on the City and County. The traffic Plan alludes to restricting construction trucks to the west entrance, which would avoid the Meadowbrook area and the bridge. However, this would need to be strictly enforced. Traffic could increase travel through the school area at Mt. Si. 3-71

The Plan calls for a substantial amount of repairs and improvements of many existing roadways – all so that this Plan can move forward. It is very obvious that the surrounding area is not equipped to handle the levels of traffic that this development will bring, let alone the traffic that currently exists. The total amount of anticipated traffic remains unclear since the Plan does not specify exactly what businesses and activities will be introduced in Planning Areas 2 and 3. 3-72

Under full buildout of the PCI Plan in 2032, several intersections would fail to meet City LOS standards (LOS D) without improvements. The Plan suggests improvements/upgrades to numerous intersections and roadways. The burden to make the improvements would fall to local jurisdictions such as the City of Snoqualmie, King County, and the Tribe. As it stands, this area cannot accommodate the development of the site, and the increase in traffic in the area. This leaves the surrounding jurisdictions in 3-73

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a predicament. If the local jurisdictions cannot agree to implement these improvements, they are faced with tremendous traffic and safety issues, and a significant amount of funding to complete these projects. There is a presumption that the road improvements will be built before the planned areas begin developing, which is both unrealistic and presumptive. If the roadways are improved at the same time as the development is occurring, this will lead to a traffic nightmare throughout the surrounding areas. 3-73

The expansion and replacement of the existing SR 202 Bridge crossing the Snoqualmie River will result in risks to cultural and environmental resources. The river and other critical areas make this a very risky and expensive endeavor that needs to be fully analyzed within this DEIS. 3-74

There needs to be a detailed construction and transportation safety Plan. There is a risk of vehicle collisions and spillage of fuels during construction and operation. 3-75

Planning Area 1 has a proposed event space for weddings, parties and corporate retreats. An average of one event per week is assumed, generally on weekends with an average of 100 people attending. Using Woodinville and other nearby towns with wineries as an example will reveal what these events can do to a community. Increased traffic and increased impaired driving will be one impact. There will be a need for traffic control during these events, as well as an increase in police. There is no mention of any of this; only that traffic will increase. There is no mention of what the extra demand is anticipated to be for the City's police department and public safety resources. 3-76

The Redevelopment Alternative includes an outdoor performance space with capacity for 5,000, with an average of two performances per week from June through September. This will be an absolute nightmare for traffic and those living in the area. Noise and traffic will be substantial. For example, Fisher Ave SE/Snoqualmie Parkway delays (in seconds) would increase from 61.7 to 650.2 during Am peak hours, and from 51.3 to 193.3 during PM peak hours for the northbound left-right-thru lane. Additionally, for the southbound left-right thru the delays would increase from 31.8 to 144 in the AM peak hours, and from 37.5 to 280.8 in the PM peak hours. 3-77

In addition to the comments above, the implications for traffic wait times are substantial. For example, with Full Buildout (Exhibit 3.11-25), using movement estimates - Fisher Ave SE/Snoqualmie Pkwy – northbound left-right-thru would have a delay increase (in seconds) of 61.7 to 716.1 in AM Peak hour, and an increase from 51.3 to 253.7 in PM peak hour. For the Southbound left-right-thru of Fisher Ave SE/Snoqualmie Pkwy – there would be an increase in delays from 31.8 to 175.2 in the AM peak hours, and an increase from 37.5 to 401.7 in PM peak hours. SE Mill Pond Road/NW Haul road would have a delay of 101.6 during peak hours. For the residents and employees in this area, these wait times are not trivial, and will lead to continued frustration and congestion in a rapidly growing area, well before any of the improvements have been made to the road infrastructures. 3-78

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The DEIS also presumes that with increased jobs, that it is anticipated that King County Metro would evaluate and may identify additional services to the Snoqualmie area, including potential new routes and more transportation choices. However, there is no indication this will happen in the Plan or through King County Metro. Such speculation should not be relied upon in the decision document. 3-79

Finally, the only time traffic is mentioned regarding Snoqualmie Falls is within Section 3.10 Historic and Cultural Resources. The note is that considering there are already 2 million annual visitors, the impacts from another increased development are minor in comparison to what already exists in this location. Notably, this comment is more in regard to how traffic would impact the TCP (which is erroneously claimed to be outside of the DEIS determination), and not how it will impact the already congested intersection at the Upper Snoqualmie Falls parking lots and the Salish Lodge & Spa. Additionally, there are no consideration or analyses of the traffic impact on the Salish Lodge & Spa due to this planned development. Such an analysis must be performed and included. 3-80

13. Section 3.12, Noise 3-56-3-58

See comments from Section 3.9.

14. Section 3.13, Parks

The DEIS states that the Riverwalk's purpose is to "support tourism and maximize the City's tourism assets." However, up until this point the Tribe was told that the Riverwalk was for flood control. Where exactly does the Riverwalk "loop over" the Snoqualmie River? 3-81

It does not appear that there were any studies or surveys of the residents of Snoqualmie that indicated that the City wanted more ball fields, volley ball courts, or other recreational areas. The impacts to conservation areas such as TSR need to be addressed. Snoqualmie Point Park was not addressed at all, and it is likely this will be impacted by the Plan.

15. Section 3.14, Public Services

This section fails to provide adequate information to make a determination of non-significance regarding impact to the community's infrastructure. The determinations for the Snoqualmie Police and Fire Departments are outdated, and are based mainly on interviews from 3-4 years ago. There is mention of these departments reviewing and issuing permits for special events, but no mention of the resources that will be needed to manage these types of events, or other unpermitted events. And, yet, the Plan acknowledges that the Snoqualmie Police Department has difficulty staffing large events. For safety and staffing purposes, there needs to be provisions to account for these staffing shortages. 3-82

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The Fire Department has not reported on service standards since 2013 and it was noted that service to the Casino is no longer included currently. This information requires updating.

The Snoqualmie School District is already beyond the capacity to handle the existing infrastructure. It is estimated that there will be an additional 730 students added to the district by 2032 without the development. The development will stretch this number even further, and additional analysis is required as to these impacts 3-83

The DEIS was submitted prior to the pandemic and needs to be updated to reflect the new reality of the current COVID-19 pandemic situation. The Plan needs to describe the indirect and cumulative impacts the additional residents and businesses could have on local public health, including the nearby hospitals.

16. Section 3.15, Utilities

There is insufficient information regarding the availability of adequate water supply to serve the development at the time that the site development and construction is approved. It is foreseeable that the City and King County will continue to experience water shortages as the surrounding area continues to grow. The City is required to certify the availability of adequate water supply to serve development a the time that site development and construction is approved. 3-84

17. Section 3.16, Fiscal and Economic Impacts

This section states that due to the prior scaling up of public services due to the growth at Snoqualmie Ridge, the City is likely going to be able to exploit economies of scale. It also suggests that the marginal cost to serve future residents citywide is likely to be less than in the past, which is contrary to basic economics. For example, the Plan states that there will be no new staff required for the Finance and Administration and Fire Departments. And yet, in Section 3.14 and 3.16, the Plan acknowledges that the City is currently facing a shortage of staffing in the Police and Fire Departments. To accommodate Planning Area 2 of the project, there is an additional need for one new officer. There is also the assumption that there will be an increase in calls for service and the capacity to respond to increased calls. This section also does not account for overtime associated with policing events related to the development, nor does it account for the socio economics associated with increased traffic, pollution, congestion, or the strain on infrastructure and roadways. 3-85

The DEIS assigns a cost of $2.86 million dollars to the City of Snoqualmie, but does not account for the cost to the Tribe. This is particularly relevant to the road improvements required to build the site, and the congestion from the traffic and construction that may discourage visitors and residents from going to the Salish Lodge & Spa or the Snoqualmie Casino. An analysis of impacts to the Tribe and its 3-86

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businesses is warranted and should be included in the Final EIS. This is particularly true as to the Salish Lodge & Spa, which could be impacted if the bridge over SR202 needs to be replaced sooner due to increased impacts related to this Project. 3-86

18. Appendix A; Master Drainage Plan

The Tribe offers the following comments on Appendix A:

- Appendix A, p. 1-4: "Because the site lies within the Snoqualmie River floodplain and is designated as a Direct Discharge site, there is less emphasis on simply demonstrating compliance with the Core Requirements, specifically Core Requirement #3 Flow Control, and #9 Flow Control BMP's. The primary emphasis is on floodplain management and on-site wetland hydrology and demonstrating compliance with direct discharge qualification criteria." This statement seems to characterize the entire site as being exempt from flow control. Please clarify how "direct discharge" applies to post-project developed area discharges to on-site aquatic areas (i.e. streams and wetlands) and how this has affected the project's approach to stormwater management. 3-87
- P. 7-1: a surface water mitigation objective is stated as: "Maintaining hydrology to surface water dependent wetlands consistent with the 2016 KCSWDM Guide Sheet 3B." Guide Sheet 3B provides that all components of the runoff be included in an analysis of pre- and post- inflows to the wetland (i.e. surface flow, interflow, and groundwater flow). This is not consistent with the approach taken as noted on p. 8-1 which states, "The model allows for the accounting of groundwater flows, however, for Snoqualmie Mill analysis only considers surface water and interflow to represent the maximum surface water impact." Please note this departure from Guide Sheet 3B and explain why it is appropriate. 3-88
- P. 3-7: "For Snoqualmie Mill, it is demonstrated in the geologic and geotechnical reports supporting the Earth section of the EIS that infiltration is not feasible." This statement seems to lack foundation, in part because there is no statement about the infeasibility of stormwater infiltration in Appendix B. For the sake of enhancing groundwater recharge and cooling site discharges, the project should commit to dispersing and infiltrating treated stormwater on-site, regardless of the flow control exemption for direct discharge to the river. 3-89
- Appendix A Master Drainage Plan, WSE Technical Memorandum, dated 3/28/18 states on p. 3: "Topographic surfaces for the Planning Area 1 and Mass Grading conditions were provided by Goldsmith, and cross section station/elevation data were cut from the surfaces in the overbank (i.e. outside the active river channel) for each condition while maintaining the previous channel geometry." Please clarify whether topographic surface data provided for river hydraulic analysis in post-project scenarios ***excluded*** or ***included*** post project flood storage below the spill levels of proposed stormwater wetlands, as this could affect the results of the unsteady downstream flood analysis. 3-90

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- The City of Snoqualmie's Comprehensive Plan documents areas of prior unpermitted fill at the Mill Site, and states that removal of this fill will be required before development (See Comp Plan at 7-13, "Land Use"). The PCIP and the DEIS do not make clear how the development will comply with this directive. Are the applicant's flood calculations predicated on a faulty baseline? 3-91

CONCLUSION

The Tribe appreciates the City's consideration of the foregoing comments regarding the Project. Further analysis is required before issuance of a Final EIS or the City should exercise its substantive authority under SEPA and deny permits and authorizations required for the Project to move forward.

The Tribe welcomes government-to-government consultation that may facilitate resolution of the Tribe's concerns regarding the Project.

Sincerely,

Snoqualmie Tribal Council

Christopher Castleberry, Acting Chairman

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Letter No. 4

Mark Hofman

From: Anne Savery <asavery@tulaliptribes-nsn.gov>
Sent: Friday, July 10, 2020 11:45 PM
To: Mark Hofman
Cc: Kurt Nelson; Ryan Miller; Anne Savery
Subject: Comments Snoqualmie Mill DEIS
Attachments: TTT_comments_Snoqualmie Mill_DEIS.pdf

Categories: Green category

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Community Development Department

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Dear Mr. Hofman

Please accept the comments of the Tulalip Tribes.

Thank you

Anne

Anne Savery
Hydrologist
503-984-0667

Natural Resources Department
Environmental Division
6406 Marine DR NW
Tulalip, WA 98271

July 10, 2020

Mark Hofman
SEPA Responsible Official
38624 SE River Street
Snoqualmie, WA 98065
mhofman@snoqualmiewa.gov

Sent via e-mail

Dear Mr. Hofman,

The Tulalip Tribes submit these comments on the Draft Environmental Impact Statement for the Snoqualmie Mill PCI Plan. The comments are brief due to our continued response to the Covid-19 pandemic. The Tribes have furloughed much of its staff to protect their health and safety and have only recently become aware of the existence of this plan. As there has already been an extension period for comments we are not asking for more time. In future, we request the City make a stronger effort to reach out to Tulalip to confirm our receipt of important planning documents such as these.

The Tulalip Tribes reserved the right to take fish in their usual and accustomed fishing places pursuant to the Treaty of Point Elliot of January 22, 1855 (12 Stat. 927). The Tulalip Tribes are the only tribe on record with federally reserved Treaty Rights in the area. These usual and accustomed treaty fishing areas include the freshwater areas of the Snohomish-Snoqualmie-Skykomish river basins and certain marine waters of the Puget Sound through which fish propagated in such basins pass. *U.S. v. Washington,* 459 F. Supp. 1020, 1038 (W.D. Wash. 1978); *U.S. v. Washington,* 626 F. Supp. 1405, 1527 (W.D. Wash. 1985), *Aff'd*, 841 F.2d 317 (9th Cir. 1988). The Tulalip Tribes are co-managers of fisheries and fish habitat with the federal government and Washington State.

General Comments

The intent of the SEPA process is to give full representation of all adverse impacts of the development alternatives. It is only when the full accounting of the direct, indirect and cumulative impacts of each alternative can be compared and contrasted with one another by those affected by the project that decisions about the tradeoffs between alternatives and the portfolio of mitigation options to address impacts can be made. Analysis and comparison of the two alternatives' impacts to Earth, Air Quality, Water Resources and Plants and Animals resulting in comments such as 'generally the same' or 'similar' in the DEIS leads us to conclude the City did not vigorously explore any action alternative but the

4-1

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preferred one. The DEIS describes the alternative as "...is not a plan that is proposed or desired by the applicant'. DEIS 1-6.

By evaluating two action alternatives which are lacking in distinction from one another, the City has not done the work necessary to identify and evaluate a reasonable development alternative which could achieve the similar results to the preferred alternative, but with lesser environmental costs, which is required in the SEPA process. WAC 197-11-440(5)(b). 4-1

The DEIS does not analyze mitigation measures meant to address project impacts to the natural environment or to flooding. Mitigation measures are actions separate from the alternatives and are intended to address the temporal and physical scale of impacts caused by each alternative. Understanding the ability of mitigation measures to address direct and cumulative impacts is crucial information for the public and decision makers to have in order to assess alternatives. 4-2

The PCI Plan requests approval of the entire plan, including build out of Areas 2 and 3, but provides very little information on those areas. The DEIS addresses only the build out of Area 1, it would be inappropriate to consider the impacts of Areas 2 and 3 to have been addressed. An EIS is meant to address the direct, indirect and cumulative impacts of a full project; separate phases will need to be addressed, even if the City does not intend to fully implement the plan in the immediate future. 4-3

Without proper analyses of the adverse impacts of action alternatives in the DEIS, the City will have to complete additional studies and analysis prior to issuing a FEIS. Barring additional studies and time for public comment, the Tribes ask the City to deny permits for the development and authorizations needed to proceed with the project. 4-4

Section 3.3 Water Resources

The location of the Mill site is next to the Snoqualmie River and within the floodplain. The City has an opportunity to make improvements to the riparian environment as well as to further protect the river; there is sufficient space to pull back development from the waterfront, including realigning Mill Pond Road away from the river. By taking a narrow view the City has overlooked the potential for improving environmental conditions on the site. Planting trees in the riparian zone, treating and retaining stormwater on site to improve water quality and reduce flooding and increasing infiltration on site can be measurable actions the City takes to mitigate for proposed changes. 4-5

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The City has benefitted from two flood control projects upstream of Snoqualmie Falls, both of which are documented in the King County Snoqualmie River Hydraulic Study, Phase I to 'generally increase downstream flows and water levels on the rising limb of the flood' and to reduce flooding upstream of the Falls. https://www.kingcounty.gov/depts/dnrp/wlr/sections-programs/river-floodplain-section/capital-projects/snoqualmie-hydraulic-hydrologic-study/phase-1-hydraulic-study.aspx 4-6

The limited scope of the hydrologic investigation has left the impact of the project downstream of the Falls unexamined. The location of the project in the floodplain requires the City to explore the potential impact of the site on downstream flooding. There should be an analysis of compensatory storage capacity on the site and it should take into account the large volume of fill that is documented on the site. There is likely an opportunity to reduce the impact of stormwater leaving the project and thus reducing the impacts on downstream flooding.

Section 3.7 Consistency with Plans and Policies

The persistence of tens of thousands of cubic yards of unpermitted fill on the Mill site post Annexation is a concern. Fill present at the site would cause issues with baseline flood calculations. The City's Comprehensive Plan states the fill would be removed prior to development. It is unclear after reading the PCI what the plan is to address the fill. Were the fill to be replaced by materials which promoted infiltration – shallow groundwater processes such as hyporheic flow, wetland recharge and base flow recharge may be initiated on the site. 4-7

The Tulalip Tribes are available to meet to give further input on this process. Please contact me with any questions or to arrange a meeting.

Sincerely

Anne Savery for

Kurt Nelson
Environmental Department Manager
Tulalip Tribes
knelson@tulaliptribs-nsn.gov
360-716-4617

Cc: Ryan Miller, Tulalip Tribes
Anne Savery, Tulalip Tribes

Letter No. 5

Mark Hofman

From: Meisner, Jennifer <Jennifer.Meisner@kingcounty.gov>
Sent: Thursday, July 09, 2020 5:48 PM
To: Mark Hofman
Cc: cmoore@preservewa.org; Griffith, Greg (DAHP); Scott, Todd; LeTourneau, Philippe; Smith, Lauren
Subject: KCHPP Comments on Snoqualmie Mill PCI Plan DEIS
Attachments: KCHPP Comments_Snoqualmie Mill DEIS_2020.pdf

Categories: Green category

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Hi Mark,

I hope this finds you well. Please see the attached comment letter on the Snoqualmie Mill PCI Plan DEIS.

Thank you for the opportunity to comment –

Jennifer

Jennifer Meisner | Historic Preservation Officer | King County Historic Preservation Program
201 S. Jackson Suite 700 | Seattle, WA 98104 | office: 206.477.0384 | cell: 206.402.8977
jennifer.meisner@kingcounty.gov | www.kingcounty.gov/landmarks
Our office is currently telecommuting. If you need to reach me directly, please call the cell phone number above.

King County
Department of Natural Resources and Parks
Historic Preservation Program
201 S. Jackson Street, Ste. 700
Seattle, WA 98104

July 9, 2020

[sent by electronic mail]

Mark Hofman, SEPA Responsible Official
City of Snoqualmie
38624 SE River Street
PO Box 987, Snoqualmie, WA 98065
mhofman@snoqualmiewa.gov

Dear Mr. Hofman:

This letter is in response to the draft Environmental Impact Statement (EIS) for the proposed Planned Snoqualmie Mill Commercial/Industrial (PCI) Plan. The Cultural Resources Assessment (Appendix E to the draft EIS), dated October 23, 2018, has been reviewed by staff in King County's Historic Preservation Program (HPP). We respectfully submit the following comments and recommendations for your consideration:

We believe this site was correctly identified as holding national significance and that individual elements that contribute to its significance were correctly identified. In our view, additional measures are needed to mitigate for potential adverse effects to cultural resources at this site. 5-1

As additional mitigation for Alternatives 1 and 2, we recommend the preparation of a National Register of Historic Places nomination for the Japanese Community site (45KI1474) as well as an interpretive plan for the entire development that includes a comprehensive history of the entire mill facility, settlement areas, and site. We also recommend inclusion of a pedestrian/biking trail with interpretative signage that would allow community members to learn about the significant history of this site. 5-2

If development in Planning Areas 2 and 3 moves forward, or if any work is completed in these areas during development of Planning Area 1 (including but not limited to demolition of existing historic resources), we recommend additional mitigation including preparation of a National Register nomination for the Snoqualmie Falls Lumber Company Historic District, and a preservation plan for incorporating various components of that district into any future development. We also believe more physical elements of a National Register district should be incorporated into any future development. Components of the National Register district should include sections of the rails and transfer routes locations, along with elements from the Planer Mill-Crane Shed, Package Lumber Shed, and Finished Lumber Shed. HABS Level III documentation shall be done prior to demolition of any components identified as contributing to a SFLCo historic district. 5-3

We believe the western part of Planning Area 1 has a higher potential for archaeological resources than asserted in the Cultural Resources Assessment and we do not concur with the recommendation that no further archaeological investigations in Planning Area 1 are necessary.

The conclusion that much of the western part of Planning Area 1 has a low probability of containing archaeological sites because sediments there consist of glacial lacustrine sediments directly below fill is not, in our view, supported by geologic evidence or the work of Cascade Archaeology, which prepared the Cultural Resources Assessment:

1) Geotechnical data from test pits and borings in this area identify sediments as possibly lacustrine ("lacustrine?") (EB-1003, EB-1014, EB-1015, EB-1016, EB-1022) or do not identify their depositional setting at all (CPT-1, EB-1, EB-3, EB-4).
2) Previous geologic mapping of this location (Booth 1990 - USGS Map I-1745; Dragovich et al. 2009 - WA DNR Map GM-75) identify Holocene alluvium here, not older glacial (Pleistocene) lacustrine sediments.
3) All of Cascadia's own archaeological test pits identified alluvium above lacustrine sediments (pp. 49-51). 5-4

Furthermore, we do not believe the archaeological test pit survey interval of 125 m (p. 44) and screening protocol (p. 46) were adequate for determining that there is little or no chance that Planning Area 1 contains archaeological resources. The survey methods were appropriate for achieving a better understanding of sediments in the area, identifying evidence of disturbance that would affect the preservation of archaeological resources, and for finding large sites with high artifact densities (i.e., not most precontact sites). Since additional subsurface investigations in locations with thick fill (like this one), are not practical, we believe archaeological monitoring of construction excavations below fill is necessary.

In our view, the conclusion that the Japanese Community archaeological site (45KI1474) will not be impacted by project activities is based on inadequate data about fill thickness across this part of the project area. Cascade Archaeology asserts that the 7.2-10 feet of fill observed in three test pits (TP5, TP6, EP-1014) is thicker than the 6-foot depth of project activities here. This assumes that the three test pits are representative of the approximately 200-x-70-m area delineated as the Japanese Community. Cascade Archaeology has already shown that fill thickness is variable so it is entirely possible that the fill is less than 6 feet thick in some places. We believe that either additional investigations need to be are conducted to characterize fill depth in this area prior to construction or that archaeological monitoring during construction is necessary.

Thank you for the opportunity to comment on this draft EIS. If you have any questions, please do not hesitate to call me at (206) 477-0384.

Sincerely,

Jennifer Meisner
King County Historic Preservation Officer

cc: Chris Moore, Executive Director, Washington Trust for Historic Preservation
Greg Griffith, Deputy State Historic Preservation Officer, Department of Archaeology & Historic Preservation

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Letter No. 6

King County
Department of Natural Resources and Parks
Parks and Recreation Division
King Street Center, KSC-NR-0700
201 South Jackson Street, Suite 700
Seattle, WA 98104-3855
206-477-4527 Fax 206-588-8011
TTY Relay: 711

RECEIVED
JUL - 9 2020 3:33pm
City of Snoqualmie
Community Development Department

July 9, 2020

Mark Hofman, SEPA Responsible Official
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Dear Mr. Hofman:

Thank you for this opportunity to provide comments and feedback on the Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan Draft Environmental Impact Statement (DEIS). The 261-acre PCI Plan site is adjacent to the King County Snoqualmie Valley Trail (SVT) and other public open spaces. King County supported the Pre-Annexation Agreement for this area and supports the PCI Plan. We appreciate the opportunity to provide feedback on how the PCI Plan can be well-integrated with our current and future trail development, mitigate impacts to the trail and adjacent public open spaces and enhance our decades-long effort to fill the last gap in public ownership of the 36-mile soft surface regional trail located on the old Chicago-Milwaukee Railroad right-of-way.

I understand the PCI Plan would redevelop the site in three phases (three planning areas) over an approximate 10- to 15-year period. Planning Area 1 would be developed in the near term and is the focus of the Draft EIS. Planning Areas 2 and 3 are conceptual at this time and will have additional environmental review later. We are providing detailed comments on the proposal as presented in this DEIS and want to be included in future review and comment on Phases 2 and 3.

The following summarizes King County's comments on the PCI DEIS:

- Planning Area 1 does not directly touch the SVT corridor. Residents and employees in Planning Area 1 will most definitely want to access the SVT. The DEIS must include a sustainable, appropriate and King County approved access point to the SVT from Planning Area 1. 6-1

- The PCI Plan site will change from an undeveloped rural landscape to a relatively urban commercial/industrial landscape over the next 10-15 years with the potential for tall buildings adjacent to the trail. Views and trail experience will be highly influenced by the development. The SVT is a rural trail facility. The PCI Plan DEIS needs to address how impacts from urban land uses to a rural facility will be mitigated. 6-2

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- The PCI Plan development will increase use of adjacent King County trails and open spaces. We would expect more urban uses which is a change from our existing regional rural uses. How will this change be mitigated? An option to mitigate the increase in use of the SVT could include sharing the cost of constructing the SVT on the rail bed through the PCI Plan Development. 6-3

- King County is negotiating with the landowner to the south of the PCI Plan development to acquire land to fill the gap in the SVT (Parcel # 2924089017). To date, the landowner has only been willing to sell the entire ownership which includes Lake Borst and surrounding properties. We request the construction of a fence along the southern boundary of the PCI Plan development to prevent potential public access. 6-4

- The Pre-Annexation Agreement adopted by Resolution 1115 on October 24th 2011 requires property to be dedicated to the City of Snoqualmie for the Snoqualmie Valley Trail in a location mutually agreed upon by the City and the owner of the property. The City is required to consult with King County Parks and Recreation regarding the location and right-of-way requirements.
    - King County is actively working to acquire the private land and rail bed south of the PCI Plan site to fill the last gap in the 36-mile regional trail.
    - King County wants to construct the SVT on the rail bed in the old Chicago-Milwaukee Railroad right-of-way which is out of the flood plain. 6-5
    - King County must be included in locating the trail dedication and is hopeful this process could help meet the two bullets above.
    - The PCI Plan and DEIS should clearly state the timing of the trail dedication.

A recorded deed (20151125001312) has a Reservation of Access Easement (Exhibit C) legally described in Exhibit 1 and depicted on Exhibit 2 of the easement. The design of the access road and trail crossing are subject to King County's approval. The PCI Plan and DEIS should clearly portray said access easement and adhere to the provisions within the easement.

King County looks forward to continuing to work with the City and Snoqualmie Mill Ventures on the PCI Plan to ensure the best outcomes integrating the new development with the SVT and surrounding King County open spaces. Please let contact Monica Leers, Manager of the Capital Planning and Land Management Section at monica.leers@kingcounty.gov or at 206-477-4575 if you have any questions or need clarification on any of our comments.

Sincerely,

DocuSigned by:
A1498C6DA09E46F...
Warren Jimenez
Director, Parks Division
King County Department of Natural Resources and Parks

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20151125001312
STEWART TITLE WD 183.00
PAGE-001 OF 001
11/25/2015 15:15
KING COUNTY, WA

AFTER RECORDING RETURN TO:

King County
Department of Natural Resources & Parks
Water and Land Resources Division
201 S. Jackson St., Suite 600
Seattle, WA 98104-3855

E2768635
11/25/2015 15:42
KING COUNTY, WA
TRX $28,789.00
SALE $1,618,000.00
PAGE-001 OF 001

STATUTORY WARRANTY DEED

(21) Stewart Title Guaranty Co.
01148-30993

Grantor -- Snoqualmie Mill Ventures, LLC
Grantee -- King County, a political subdivision of the state of Washington
Legal ---- Lts. A, B, & C C/Sno BLA, LLA15-01, Rec. No 20151106900001
Tax Acct. – 292408-9002; 292408-9003; 292408-9022; 292408-9023; and 292408-9028

The Grantor, Snoqualmie Mill Ventures, LLC, a limited liability company of the State of Washington, for and in consideration of mutual benefits, does hereby convey and warrant unto the Grantee, King County, a political subdivision of the State of Washington, the following the real property situate in King County, Washington and described in EXHIBIT A (the "Property"), attached hereto and incorporated herein by this reference, subject to the permitted exceptions set forth in EXHIBIT B.

The property herein conveyed is subject to open space use restrictions and restrictions on alienation as specified in RCW §84.34.200, et seq., King County Code 26.12.005, et seq. and King County Ordinance No. 14714. This project was funded in part by and is subject to the terms of the Open Space, Regional Trails, and Woodland Park Zoo levy lid lift authorized by King County Ordinance 15760 and approved by voters in August 2007. The County covenants that the property will be used for the purposes contemplated by Ordinance 15760, that the property shall not be transferred or conveyed except by deed providing that the property shall continue to be used for the purposes contemplated by Ordinance 15760, and that the property shall not be converted to a different use unless other equivalent property within the County shall be received in exchange therefore. Provided, however, that nothing in this paragraph shall be intended to limit the rights of Grantor's Reservation of Access Easement attached hereto as EXHIBIT C and provided for below.

Grantor hereby expressly reserves to itself, its successors and assigns forever an easement for access attached hereto as EXHIBIT C, and the foregoing conveyance of the Property is subject, to the Reservation of Access Easement attached hereto as EXHIBIT C, recorded along with this Deed and incorporated herein by this reference. Such easement shall be on over, across and through the real property described in EXHIBIT A attached hereto, reserved to Grantors and all successor owners of the real property described in EXHIBIT D attached hereto.

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GRANTOR
Snoqualmie Mill Ventures, LLC

BY: _____

TITLE: MEMBER

DATE: 11/23/15

GRANTEE
King County

BY: Signed in Counterpart

TITLE: _____

DATE: _____

Approved as to Form:

By _____
Deputy Prosecuting Attorney

NOTARY BLOCKS APPEAR ON NEXT PAGE

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GRANTOR	GRANTEE
Snoqualmie Mill Ventures, LLC	King County
BY: Signed in counterpart	BY: Kathy Tu
TITLE:	TITLE: Deputy Director
DATE:	DATE: 11/24/15

Approved as to Form:

By _____
Deputy Prosecuting Attorney

NOTARY BLOCKS APPEAR ON NEXT PAGE

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NOTARY BLOCK FOR SNOQUALMIE MILL VENTURES, LLC

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this 23rd *day of* November, *2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared* Stephen T. Rimmer, *to me known to be the* member, *who executed the foregoing instrument and acknowledged to me that ~~SHE or HE~~ was authorized to execute said instrument on behalf of the Snoqualmie Mill Ventures, LLC for the uses and purposes therein mentioned.*

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

MARY I. SAWCHUK
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
NOVEMBER 19, 2017

Mary I. Sawchuk
Mary I. Sawchuk

Notary Public in and for the State of Washington, residing at Sammamish, WA
City and State

my appointment expires: Nov. 19, 2017

NOTARAY BLOCK FOR KING COUNTY

My appointment expires _____

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared _____, to me known to be the _____, and who executed the foregoing instrument and acknowledged to me that SHE was authorized to execute said instrument on behalf of KING COUNTY for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the State of Washington, residing at _____
City and State

My appointment expires _____

Unofficial Copy

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NOTARY BLOCK FOR SNOQUALMIE MILL VENTURES, LLC

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared _____, to me known to be the _____, who executed the foregoing instrument and acknowledged to me that SHE or HE was authorized to execute said instrument on behalf of the Snoqualmie Mill Ventures, LLC for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the
State of Washington, residing
at _____
City and State

NOTARAY BLOCK FOR KING COUNTY

My appointment expires _____

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this 24 *day of* November *, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared* Kathryn Terry *, to me known to be the* Deputy Director ~~Parks & Recreation~~ *and who executed the foregoing instrument and acknowledged to me that SHE was authorized to execute said instrument on behalf of KING COUNTY for the uses and purposes therein mentioned.*

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the
State of Washington, residing
at Bellevue WA
City and State

My appointment expires 4/14/18

REBECCA M. ANDERSEN
COMMISSION EXPIRES
NOTARY
PUBLIC
APRIL 14, 2018
STATE OF WASHINGTON

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EXHIBIT "A"
LEGAL DESCRIPTION

Parcel I:

Lots A, B and C of City of Snoqualmie Lot Line Adjustment No. LLA15-01, being a portion of the West Half of the Northeast and of the Southeast Quarters of Section 29, Township 24 North, Range 8 East, W. M., in King County Washington, as recorded November 6, 2015 under Recording Number 20151106900001, records of King County, Washington.

Grantor hereby expressly reserves from each of the above referenced real property to itself, its successors and assigns forever an easement for access attached to this Statutory Warranty Deed as EXHIBIT C, and the foregoing conveyance of the Property is subject, to the Reservation of Access Easement attached hereto as EXHIBIT C, recorded along with this Deed and incorporated herein by this reference. Such easement shall be on over, across and through the real property described in EXHIBIT A attached to this Statutory Warranty Deed, reserved to Grantors and all successor owners of the real property described in EXHIBIT D attached to this Statutory Warranty Deed.

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EXHIBIT "B"
EXCEPTIONS

1. All easements, covenants, conditions, restrictions, encumbrances and other matters of record.

2. Liability for future sewer treatment capacity charges that may be assessed but not disclosed in the public records. None currently due and payable.

3. Any unrecorded leaseholds, right of vendors and holders of security interest on personal property installed upon said property, and right of tenants to remove trade fixtures at the expiration of the term.

4. Questions pertaining to a portion of Lot A of Parcel I herein, described as follows:

   "A strip of land 50 feet in width within the Northwest Quarter of the Northeast Quarter of Section 29, Township 24 North, Range 6 East, W. M., in King County, Washington, lying Westerly of 396th Drive S. E. (County Road # 494);

   Being that portion conveyed by the Chicago, Milwaukee and Puget Sound Railway Company to King County for public highway purposes by deed recorded January 18, 1911, in Volume 749 of Deeds, pages 449 and 450, under Auditor's File No. 726735."

   Said deed contains a clause of reverter, which indicates that if said Parcel ceases to be used for the purposes of public highway, that title thereto shall revert to and become re-vested in the grantor. Said strip of land was subsequently conveyed by deed from said Railway Company to Weyerhaeuser Timber Company by deed recorded October 22, 1912, recorded under Auditor's File No. 832585, including other property. No quit claim deed executed by King County to said Railway Company has been found of record. No County Ordinance vacating said strip of land has been found of record. King County did not join in the execution of said deed under Auditor's File No. 832585, nor is said Parcel reference on said deed as being a vacated road. If said strip has been vacated or abandoned by King County, proof of the fact should be submitted prior to closing.

5. Exceptions and Mineral Reservations as contained in instrument:
   From: Northern Pacific Railway Company
   Recorded: September 2, 1902
   Recording No.: 240485
   (Includes other property)

6. Exceptions and Mineral Reservations as contained in instrument:
   From: Weyerhaeuser Timber Company
   Recorded: October 24, 1910
   Recording No.: 712061
   (Affects: Lot C of Parcel I and other property)

7. Exceptions and Mineral Reservations as contained in instrument:
   From: Weyerhaeuser Timber Company
   Recorded: February 17, 1911
   Recording No.: 731964
   (Affects: Parcel I)

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8. Easement and the terms and conditions thereof, disclosed by instrument:
   In favor of: Chas Weller
   Purpose: Private road use
   Affects: A 12-foot wide strip across an un-locatable portion of Parcel I
   Recorded: February 27, 1915
   Recording No.: 982898

9. Easement and the terms and conditions thereof:
   Grantee: Chicago, Milwaukee and Saint Paul Railway Company
   Purpose: Electric transmission system
   Affects: Portions of Parcels I and III
   Recorded: June 6, 1919
   Recording No.: 1313982

10. Easement and the terms and conditions thereof:
    Grantee: Puget Sound Power & Light Company
    Purpose: Electric transmission line and appurtenances
    Affects: Portion of the Northeast Quarter of Section 29
    Recorded: August 22, 1963
    Recording No.: 5627802

    Said easement has been modified by Recording Number 6723952.

11. Exceptions and Reservations as contained in instrument:
    From: Richard B. Ogilvie, Trustee of the property of the Chicago, Milwaukee, St Paul and Pacific Railroad Company
    Recorded: October 21, 1980
    Recording No.: 8010210653
    (Affects: Portions of Parcel I)

12. Terms, conditions and reservations as contained in instrument:
    From: Weyerhaeuser Company
    Recorded: October 29, 1990
    Recording No.: 9010291617
    (Affects: Portion of Parcel III and other property)

13. King County Sensitive Area Notice and the terms and conditions thereof:
    Recorded: July 24, 1991
    Recording No.: 9107241160
    (Affects: Portions of Parcel I and other property)

14. City of Snoqualmie Outside Water Service Agreement and the terms and conditions thereof:
    Recorded: November 16, 1994
    Recording No.: 9411160972
    (Affects: Said instrument refers to "Weyerhaeuser Mill Site", but no legal description of service area is attached thereto.)

15. Easement and the terms and conditions thereof:
    Grantee: Puget Sound Energy, Inc.
    Purpose: Natural Gas facilities
    Affects: Portions of Parcel I and portion of Parcel III
    Recorded: December 3, 1998
    Recording No.: 9812030904

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16. King County Landmarks Commission Landmark Designation and the terms and conditions thereof:
    Recorded: March 29, 2005
    Recording No.: 20050329000865
    (Affects: Snoqualmie Falls Lumber Company power plant on portions of Parcel I and other property)

17. Exceptions and Reservations as contained in Instrument:
    From: Weyerhaeuser Company
    Recorded: May 14, 2008
    Recording No.: 20080514000800
    (Affects: Mineral Resources and Aggregate Resources of said premises and other property, non-exclusive easements and communications site)

    Release of Mineral Reservation recorded November 23, 2010 under Recording Number 20101123000222, unto Weyerhaeuser Real Estate Development Company.

18. Numerous unrecorded easements, permits and agreements as disclosed by recitals on Statutory Warranty Deed and the terms and conditions thereof:
    Recorded: May 14, 2008
    Recording No.: 20080514000800
    Grantor: Weyerhaeuser Company
    Grantee: Weyerhaeuser Real Estate Development Company
    (Affects: Said premises and other property)

19. Notice of Snoqualmie 1040 Water Storage Reservoir and Supply System Latecomer Hookup Agreement, filed by the City of Snoqualmie and the terms and conditions thereof, including but not limited to possible assessments recorded under Recording No(s). 20081031000102.
    (Includes other property)

20. Easement and the terms and conditions thereof:
    Grantee: IFF Holding, LLC, a Washington limited liability company
    Purpose: Non-exclusive easement for road and maintenance thereof
    Affects: Portion of Parcel III and other property
    Recorded: July 31, 2009
    Recording No.: 20090731001887

21. Terms and conditions of Boundary Line Adjustment No. L10L0024:
    Recorded: June 30, 2010
    Recording No.: 20100630900006
    (Affects: Parcel III and other property)

    Amendment/Modification and the terms and conditions thereof:
    Recorded: July 2, 2012
    Recording No.: 2012072900002

22. Exceptions and Reservations as contained in Instrument:
    From: Weyerhaeuser Real Estate Development Company
    Recorded: June 30, 2010
    Recording No.: 20100630001825

23. City of Snoqualmie Pre-annexation Agreement and the terms and conditions thereof:
    Recorded: November 4, 2011
    Recording No.: 2011110400164
    (Includes other property)

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24. Any prohibition or limitation on the use, occupancy, or improvements of the land resulting from the rights of the public or riparian owners to use any waters which may cover the land or to use any portion of the land which is now or may formerly have been covered by water.

25. The right of use, control, or regulation by the United States of America in exercise of power over commerce, navigation and fisheries.

26. Any questions that may arise due to shifting or change of the line of ordinary high water of the un-named stream or due to the un-named stream having shifted or changed line of ordinary high water. (Affects: Parcel I)

27. Any question that may arise due to the shifting or change in the course of the unnamed stream or due to the unnamed stream having shifted or changed its course. (Affects: Parcel I)

28. Terms and conditions of Boundary Line Adjustment No. LLA15-01:
    Recorded: November 6, 2015
    Recording No.: 201511060900001
    (Affects: Parcel I and other property)

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EXHIBIT "C"

RESERVATION OF ACCESS EASEMENT

This RESERVATION OF ACCESS EASEMENT ("Easement") is made and effective as of the date of the Statutory Warranty Deed in which it is incorporated and is between KING COUNTY, a municipal corporation and political subdivision of the State of Washington ("County") and Snoqualmie Mill Ventures, LLC, a Washington limited liability company ("SMV").

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RECITALS

A. County is acquiring from SMV and SMV is conveying to County for and in consideration of the terms and conditions of that certain Real Estate Purchase and Sale Agreement between County and SMV dated September 29, 2015, as amended (the "Purchase and Sale Agreement") that certain real property the legal description of which is attached to the Statutory Warranty Deed as EXHIBIT A (the "Property").

B. The Purchase and Sale Agreement provides that SMV shall reserve a sixty (60) foot wide access easement in, on, over, across and through a portion of the Property.

C. SMV's agreement to convey the Property to County is conditioned upon reservation of a permanent access easement. Therefore, SMV reserves the following: a permanent access easement in, on, over, across, and through that portion of the Property, legally described in EXHIBIT 1 and depicted on EXHIBIT 2 hereto (the "Easement Area"). The Easement Area shall benefit the property described in EXHIBIT 3 (the "SMV Property").

D. SMV hereby reserves and the County hereby accepts the reservation of a permanent access easement in, on, over, across, and through that portion of the Property the legal description of which is attached hereto as EXHIBIT 1 and as depicted in EXHIBIT 2.

By accepting and recording this Reservation of Access Easement and in consideration of the terms and conditions of the Purchase and Sale Agreement and other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, SMV and the County mutually covenant and agree as follows:

AGREEMENT

1. Reservation of Easement. All recitals set forth above are incorporated into this Access Easement as though fully set forth herein. SMV hereby reserves for the purposes stated below, a permanent access easement in, on, over, across, and through that portion of the Property the legal description of which is attached hereto as EXHIBIT 1 and as depicted in EXHIBIT 2.

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2. Purpose of Easement. SMV shall have the right in the Easement Area to construct, install, repair, replace, maintain, operate and use a road, designed as necessary to serve SMV's adjacent property but subject to the County's approval rights and SMV's obligations as set forth below in Section 4, together with all necessary or convenient appurtenances thereof (the "Easement Improvements"). The rights reserved herein by SMV shall be for the purpose of use of the Easement Area to provide pedestrian and vehicular access of all kinds to the SMV Property in connection with the current use and future redevelopment of the SMV Property for any and all uses permitted by law.

3. Access. SMV's employees, invitees, agents, and contractors shall have the right at all times, without prior notice of the County, to enter upon the Easement Area, by foot, bicycle, or vehicle, for the purposes set forth above.

4. Easement Improvements Construction. SMV shall obtain all necessary permits and temporary property rights for construction of the Easement Improvements. Prior to commencing construction of the Easement Improvements, SMV shall present the County with evidence it has received the necessary permits and temporary property rights associated with said improvements, and shall obtain the County's approval of the design of the Easement Improvements (together, the "Easement Improvements Approval"). In connection with the construction of the Easement Improvements, SMV agrees to construct, at its sole cost, an at-grade crossing over the Easement Improvements to accommodate the County's planned trail through the Property (the "Trail Crossing"). Construction of the Trail Crossing shall be conducted to reasonably minimize interference with trail use, and for as short a duration as is reasonably possible. The Trail Crossing design and construction timeline shall be subject to the Easement Improvements Approval. The Easement Improvements Approval shall not be unreasonably withheld or delayed in time.

Unofficial Document

5. Obstructions, Use and Maintenance. SMV may from time to time remove structures, trees, bushes, or other obstructions within the Easement Area and may level and grade the Easement Area to the extent reasonably necessary to carry out the purposes set forth herein.

6. Indemnity and Insurance. The County, its officials, officers, directors, employees and agents shall not be liable for any loss, claim or damage to persons or property resulting from the use of the Easement Area by SMV, its members, officers, directors, employees, agents, contractors, subcontractors, lessees, sublessees, guests and invitees, except for loss, claim or damage resulting from the negligence or willful misconduct of the County or the County's officials, officers, directors, employees, agents, contractors, subcontractors, lessees, or sublessees. SMV shall protect, defend, indemnify and hold the County harmless from and against any and all claims, demands, losses, damages, expenses and liabilities of every kind and description and for any loss to or damage or destruction of property suffered by the County arising out of SMV's use of the Easement Area, except to the extent caused by the negligence or willful misconduct of the County or the County's officials, officers, directors, employees, agents, contractors, subcontractors, lessees, or sublessees. SMV agrees that its obligations under this provision extend to any claim, demand, and/or cause of action brought by or on behalf of any of its employees, or agents. The foregoing indemnity is specifically and expressly intended to constitute a waiver of SMV's immunity under Washington's Industrial Insurance act, RCW Title

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51, as respects the County only, and only to the extent necessary to provide the County with a full and complete indemnity of claims made by SMV's employees. The parties acknowledge that these provisions were specifically negotiated and agreed upon by them. The County shall give SMV prompt written notice of any suit or proceeding entitling the County to indemnification pursuant to this Section 6 and SMV shall thereafter defend the County in said suit or proceeding at its sole cost and expense to the extent required under this Section 6.

Upon execution of this Easement, SMV, at its own cost, shall have procured and will maintain for the duration of this Easement, minimum insurance as specified below, and shall furnish the County with the certificate of insurance and endorsement required by this Easement. SMV shall maintain insurance at the following limits and including the following provisions:

• General Liability: $1,000,000 combined single limit per occurrence for bodily injury, personal injury and property damage, and for those policies with aggregate limits, a $2,000,000 aggregate limit. This policy shall cover the County, its officers, employees and agents as additional insureds as respects liability arising out of SMV's exercise of rights and privileges granted by Easement. Such coverage shall be primary and non-contributory insurance as respects the County, its officers, officials, employees and agents. An Additional Insured Endorsement in the form of "CG 2010 11/85" or its equivalent shall be included with the certificate of insurance. The County requires this Endorsement to complete the Contract.

7. No Interference with Easement Rights. The County reserves the right to use the Easement Area for purposes not inconsistent with the rights herein granted. The County shall not undertake any digging, tunneling or other form of construction activity in the Easement Area or on the Property which would damage the Easement Improvements or which would unnecessarily interfere with use of the Easement Area for ingress and egress to SMV's property unless agreed to in writing by the SMV. The County shall not obstruct the Easement Area.

8. Miscellaneous.

(a) Captions. The captions and paragraph headings contained in this Reservation of Easement are for convenience of reference only and in no way define, describe, extend or define the scope or intent of this Easement, nor the intent of any of the provisions hereof.

(b) Governing Law. This Reservation of Easement shall be governed by and construed and enforced in accordance with the laws of the State of Washington. The parties agree that venue of any legal action brought to enforce this Easement shall be in King County, Washington.

(c) Recitals Incorporated; Definitions. Each recital and definition set forth above is incorporated into this Easement as though fully set forth herein.

(d) Attorney's Fees and Costs. If either party shall bring an action to enforce the terms of this Agreement, in any such action the prevailing party shall be entitled to an award of its reasonable attorneys' fees and reasonable costs. Said costs and attorneys' fees shall include, without limitation, costs and attorneys' fees incurred in any appeal or in any proceedings under any present or future federal bankruptcy, forfeiture or state receivership or similar law.

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(e) Severability. All provisions of this Agreement are severable and the invalidity or unenforceability of any provision shall not affect or impair the validity or enforceability of the remaining provisions.

(f) Binding Effect; Successors and Assigns. The rights and obligations of the parties shall be deemed to run with the land and the easement shall be perpetual with regard to securing access to the Benefited Property. Other than assignments to a future successor or assign in the SMV's ownership of the Benefited Property, SMV may not assign this easement or any rights acquired under it without the prior written consent of the County, which shall not be unreasonably withheld. This restriction on assignment shall not apply in the event of a merger, consolidation or assumption or other transfer of facilities that occur through the operation of law. This Agreement may be amended or modified only by written instrument, executed and acknowledged by the parties hereto or their successors or assigns, recorded with the King County Auditor.

(g) Entire Agreement. This Agreement contains the entire agreement of the parties and supersedes any prior written or oral agreements with respect to the matters described herein.

9. Fee Ownership Contingency. If, in connection with SMV's efforts to develop its adjacent properties, SMV is required by a regulatory authority with jurisdiction over such development efforts to obtain fee ownership of the Easement Area, the County will cooperate in good faith with SMV to transfer fee ownership of the Easement Area to SMV on terms acceptable to the County, which transfer will be subject to approval by ordinance of the Metropolitan King County Council, if such approval is required by applicable laws.

[Signatures attached.]

Unofficial Copy

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Effective as of this 25 day of November, 2015.

SMV:
Snoqualmie Mill Ventures, LLC

BY: _____

TITLE: Member

DATE: 11-25-15

COUNTY:
King County

BY: Signed in Counterpart

TITLE: _____

DATE: _____

Approved as to Form:

By _____
Deputy Prosecuting Attorney

NOTARY BLOCKS APPEAR ON NEXT PAGE

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DocuSign Envelope ID: 9CE9820F-3DE4-4CDA-A97F-8A5D936B0EF9

Effective as of this 24 day of November, 2015.

SMV:
Snoqualmie Mill Ventures, LLC

BY: Signed in Counterpart

TITLE: _____

DATE: _____

COUNTY:
King County

BY: Kathy Tu

TITLE: Deputy Director

DATE: 11/24/15

Approved as to Form:

By _____
Deputy Prosecuting Attorney

NOTARY BLOCKS APPEAR ON NEXT PAGE

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NOTARY BLOCK FOR SNOQUALMIE MILL VENTURES, LLC

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this 25th *day of* November, *2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared* Stephen T. Rimmer, *to me known to be the* member, *who executed the foregoing instrument and acknowledged to me that SHE or HE was authorized to execute said instrument on behalf of the Snoqualmie Mill Ventures, LLC for the uses and purposes therein mentioned.*

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

MARY I. SAWCHUK
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
NOVEMBER 19, 2017

Mary I Sawchuk
Mary I. Sawchuk

Notary Public in and for the State of Washington, residing at Sammamish, WA
City and State

My Appointment Expires: NOV. 19. 2017

Unofficial Copy

NOTARAY BLOCK FOR KING COUNTY

My appointment expires _____

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared _____, to me known to be the _____, and who executed the foregoing instrument and acknowledged to me that SHE was authorized to execute said instrument on behalf of KING COUNTY for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the State of Washington, residing at _____
City and State

My appointment expires _____

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NOTARY BLOCK FOR SNOQUALMIE MILL VENTURES, LLC

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared _____, to me known to be the _____, who executed the foregoing instrument and acknowledged to me that SHE or HE was authorized to execute said instrument on behalf of the Snoqualmie Mill Ventures, LLC for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the
State of Washington, residing
at _____,
City and State

My appointment expires _____

Unofficial Copy

NOTARAY BLOCK FOR KING COUNTY

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

On this 24 day of November, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Kathryn Terry, to me known to be the Deputy Director, and who executed the foregoing instrument and acknowledged to me that SHE was authorized to execute said instrument on behalf of KING COUNTY for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

REBECCA PETERSEN NOTARY PUBLIC STATE OF WASHINGTON COMMISSION EXPIRES APRIL 14, 2018

Notary Public in and for the
State of Washington, residing
at Bellevue WA
City and State

My appointment expires 4-14-18

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EXHIBIT 1 TO RESERVATION OF ACCESS EASEMENT

Legal Description of Easement Area

Unofficial Copy

DocuSign Envelope ID: 9CE9820F-3DE4-4CDA-A97F-8A5D936B0EF9

October 23, 2015

LEGAL DESCRIPTION

FOR

SNOQUALMIE MILL VENTURES, LLC

Unofficial Copy

ACCESS EASEMENT

That portion of the West half of the Northeast Quarter and the Northwest Quarter of the Southeast Quarter of Section 29, Township 24 North, Range 8 East, Willamette Meridian, King County, Washington, described as follows:

A strip of land 60 feet in width lying 30 feet on each side of the following described centerline:

BEGINNING at the North Quarter corner said Section 29;
Thence S 00°23'05" E, along the West line of the Northeast Quarter of said Section 29, being also the East line of Lot 1 of King County Boundary Line Adjustment and Large Lot Segregation No. L10L0024, as recorded under Recording No. 20100630900006, and amended under Recording No. 20120702900002, a distance of 1,117.27 feet to a point on the arc of a curve, and the TRUE POINT OF BEGINNING of the herein described centerline;
Thence Southeasterly along an arc of a curve to the right, the center of which bears S 08°08'52" W, said curve having a radius of 300.00 feet, through a central angle of 74°05'49", a distance of 387.97 feet;
Thence S 07°45'20" E a distance of 631.45 feet to a point of curve;
Thence Southerly along an arc of a curve to the right, said curve having a radius of 300.00 feet, through a central angle of 18°17'08", a distance of 95.74 feet;
Thence S 10°31'48" W a distance of 343.32 feet to a point of curve;
Thence Southerly along an arc of a curve to the left, said curve having a radius of 300.00 feet, through a central angle of 47°43'31", a distance of 249.89 feet;
Thence S 37°11'42" E a distance of 193.26 feet to a point of curve;
Thence Southeasterly along an arc of a curve to the left, said curve having a radius of 334.00 feet, through a central angle of 15°12'37", a distance of 88.67 feet, to a point designated as Point "A" for the purposes of this description;
Thence S 52°24'20" E a distance of 129.97 feet to a point of curve;
Thence Southeasterly along an arc of a curve to the right, said curve having a radius of 330.00 feet, through a central angle of 20°41'44", a distance of 119.20 feet;

Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

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Thence S 31°42'36" E a distance of 13.90 feet, to the West Margin of 396th Drive SE (County Road #494) and the terminus of the herein described centerline.

The sidelines of said strip are to be lengthened or shortened in order to close upon the West line of the Northeast Quarter of said Section 29, being the East Line of said Lot 1, and the West margin of 396th Drive SE (County Road #494) and the South line of Tract E of said Boundary Line Adjustment.

TOGETHER WITH that portion of Tract E of King County Boundary Line Adjustment and Large Lot Segregation No. L10L0024, as recorded under Recording No. 20100630900006, and amended under Recording No. 20120702900002, described as follows:

BEGINNING at the aforementioned Point "A"
Thence N 37°35'40" E a distance of 30.00 feet to the Northeasterly margin of the above described strip of land;
Thence S 52°24'20" E a distance of 17.78 feet, along said margin; to a point of curve and the TRUE POINT OF BEGINNING;
Thence Easterly, departing said margin, along an arc of a curve to the left, said curve having a radius of 14.00 feet, through a central angle of 92°09'45", a distance of 22.52 feet to a point of compound curve;
Thence Northerly along an arc of a curve to the left, said curve having a radius of 300.00 feet, through a central angle of 38°31'39", a distance of 201.73 feet;
Thence N 09°42'54" W a distance of 189.83 feet;
Thence N 80°17'06" E a distance of 12.00 feet to the West Margin of 396th Drive SE (County Road #494), being also the East Line of said Tract E;
Thence S 09°42'54" E a distance of 338.31 feet, along said margin and East Line to a point of curve the center of which bears N 69°09'24" W;
Thence Southwesterly departing said margin and East line and along an arc of a curve to the right, said curve having a radius of 360.00 feet, through a central angle of 15°05'52", a distance of 94.86 feet to a point of reverse curve;
Thence Southerly along an arc of a curve to the left, said curve having a radius of 14.00 feet, through a central angle of 88°20'47", a distance of 21.59 feet to the Northeasterly margin of said strip of land;
Thence N 52°24'20" W along said margin a distance of 86.05 feet to the TRUE POINT OF BEGINNING of the herein described portion of Tract E.



Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

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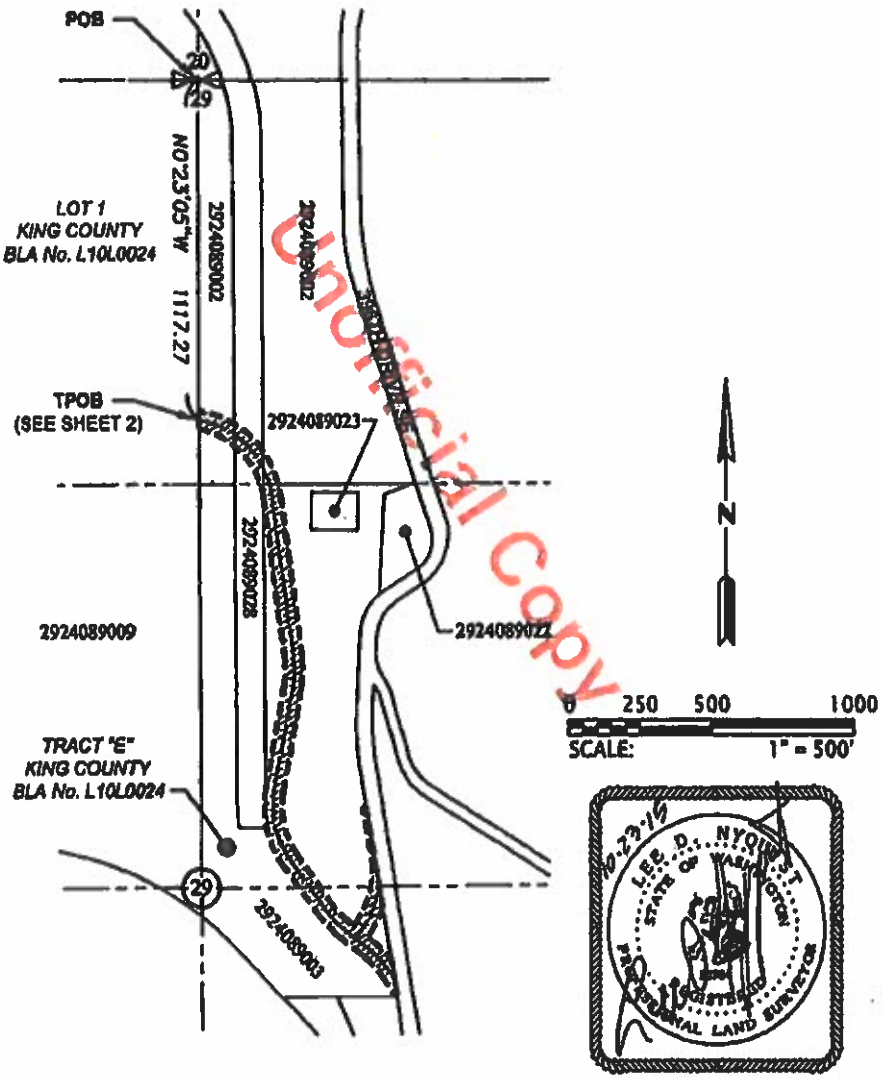
EXHIBIT 2 TO RESERVATION OF ACCESS EASEMENT

Depiction of Easement Area

Unofficial Copy

DocuSign Envelope ID: 9CE9820F-3DE4-4CDA-A97F-8A5D936B0EF9

W 1/2, NE 1/4 & NW 1/4, SE 1/4 SECTION 29, TOWNSHIP 24 N, RANGE 8 E, W.M.
CITY OF SNOQUALMIE, KING COUNTY, WASHINGTON



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GOLDSMITH
LAND DEVELOPMENT SERVICES
PO Box 3565, Bellevue, WA 98004 T 425 452 1080 F 425 462 7719

JOB NO: 12046

ACCESS EASEMENT
FOR
SNOQUALMIE MILL

1/5

BY: MJAINGA | APR: LNYQUIST
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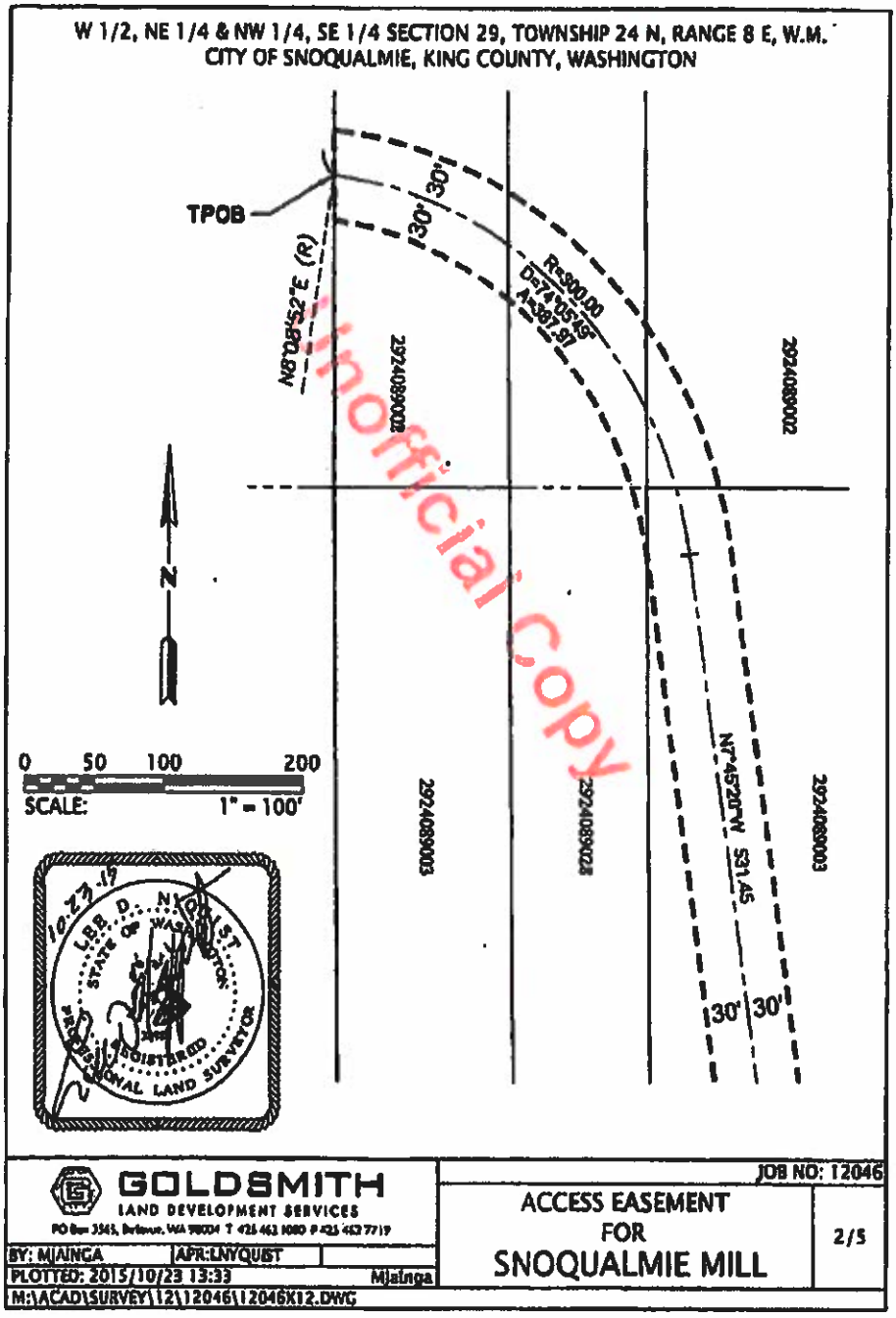

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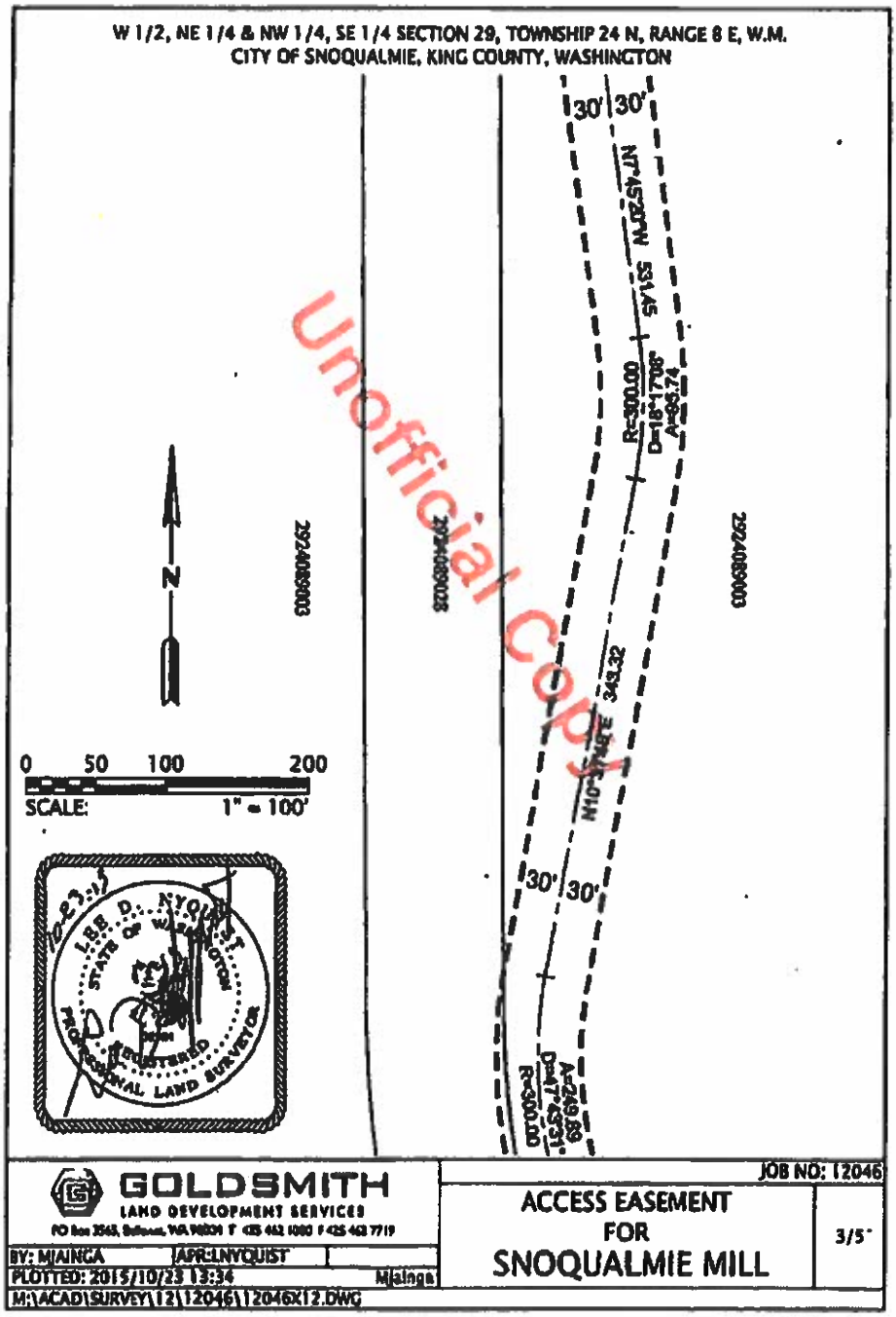

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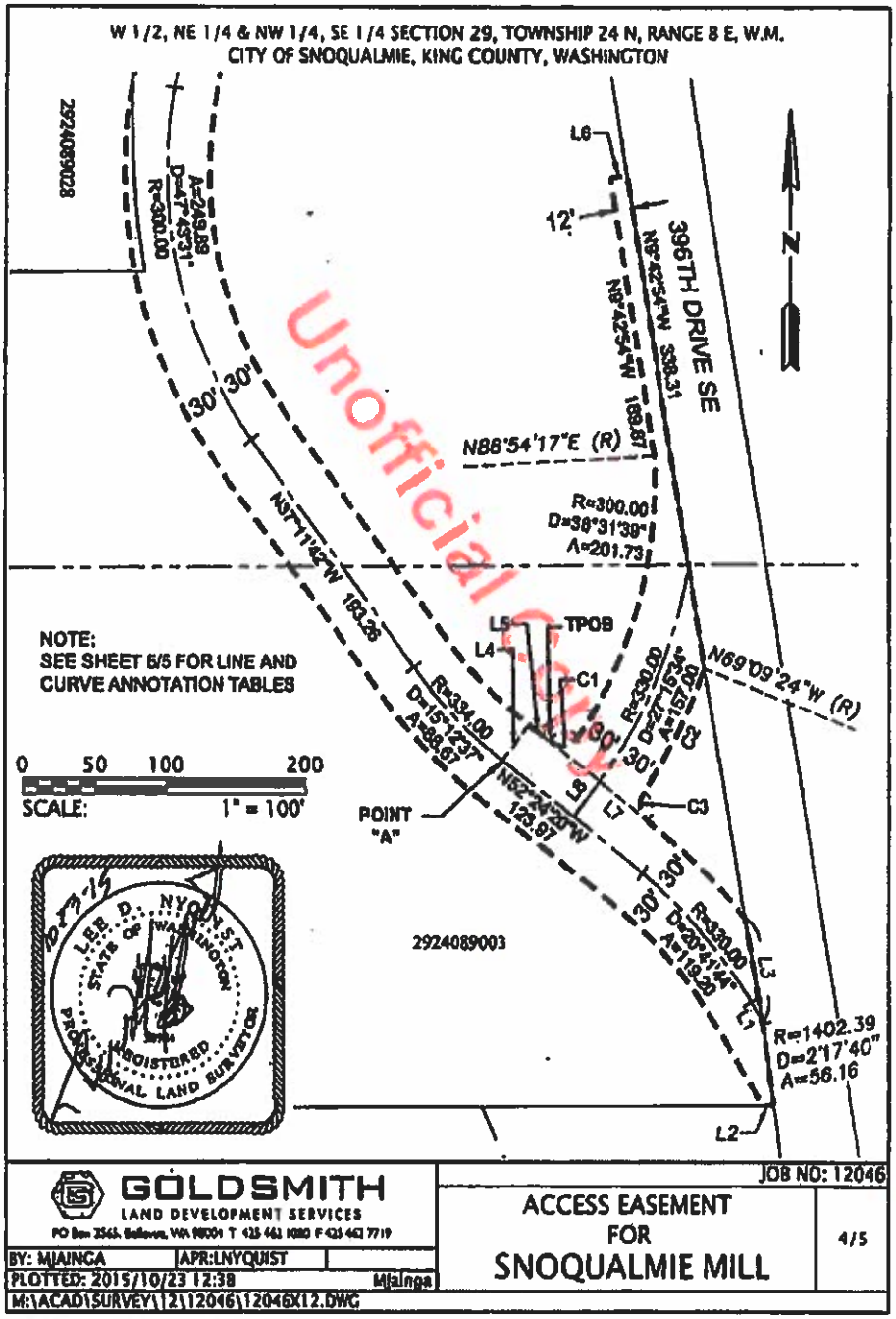

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W 1/2, NE 1/4 & NW 1/4, SE 1/4 SECTION 29, TOWNSHIP 24 N; RANGE 8 E, W.M.
CITY OF SNOQUALMIE, KING COUNTY, WASHINGTON

LINE TABLE		
LINE NO.	BEARING	DISTANCE
L1	N31° 42' 36"W	13.60
L2	S89° 44' 54"W	8.29
L3	S9° 42' 54"E	72.60
L4	N37° 35' 40"E	30.00
L5	N52° 24' 20"W	17.76
L6	N80° 17' 06"E	12.00
L7	N52° 24' 20"W	88.05
L8	N37° 35' 40"E	33.21

CURVE TABLE			
CURVE NO.	RADIUS	DELTA ANGLE	ARC LENGTH
C1	R=14.00	D=92°09'45"	22.52
C2	R=360.00	D=15°05'52"	94.86
C3	R=14.00	D=88°20'47"	21.59

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GOLDSMITH
LAND DEVELOPMENT SERVICES
PO Box 2565, Bellevue, WA 98004 T 425 462 1080 F 425 462 7719

BY: MJAINGA | APR:LNYQUIST
PLOTTED: 2015/10/23 12:27 Mjainga
M:\ACAD\SURVEY\12\12046\12046X12.DWG

JOB NO: 12046

ACCESS EASEMENT
FOR
SNOQUALMIE MILL

5/5

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EXHIBIT 3 TO RESERVATION OF ACCESS EASEMENT

Legal Description of SMV Property

Unofficial Copy

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November 24, 2015

LEGAL DESCRIPTION

FOR

SNOQUALMIE MILL VENTURES LLC

SMV PROPERTY POST-FEE PROPERTY TRANSFER

Lot 1, Tract C and Tract E, King County Boundary Line Adjustment and Large Lot Segregation No. L10L0024, as recorded under King County Recording No. 20100630900006; located in portions of Sections 20, 29 and 30, Township 24 North, Range 8 East, W.M., in King County, Washington;

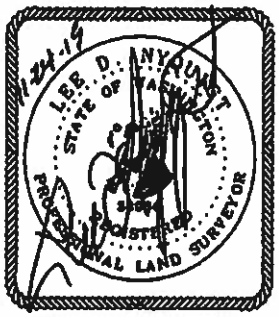
TOGETHER WITH the Northwest Quarter of the Northwest Quarter of Section 29, Township 24 North, Range 8 East, W.M., King County, Washington;

AND TOGETHER WITH that portion of the West Half of the Northeast Quarter of Section 29 Township 24 North, Range 8 East, W.M., in King County, Washington, lying Westerly of 396th Drive S.E. and outside of Tract E of said King County BLA No. L10L0024;

AND TOGETHER WITH that portion of the Northeast Quarter of Section 30, Township 24 North, Range 8 East, W.M., in King County, Washington, lying Northeasterly of S.E. Mill Pond Road, and Easterly of that certain tract of land conveyed to the City of Snoqualmie by Statutory Warranty Deed recorded under Recording No. 9010291617;

EXCEPT Lots A, B and C, City of Snoqualmie Lot Line Adjustment No. LLA15-01 as recorded under Recording No. 20151106900001, records of King County, Washington.

Unofficial Copy



Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

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EXHIBIT "D"

GRANTOR LEGAL DESCRIPTION

[See attached.]

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November 24, 2015

LEGAL DESCRIPTION

FOR

SNOQUALMIE MILL VENTURES LLC

SMV PROPERTY POST-FEE PROPERTY TRANSFER

Lot 1, Tract C and Tract E, King County Boundary Line Adjustment and Large Lot Segregation No. L10L0024, as recorded under King County Recording No. 20100830900006; located in portions of Sections 20, 29 and 30, Township 24 North, Range 8 East, W.M., In King County, Washington;

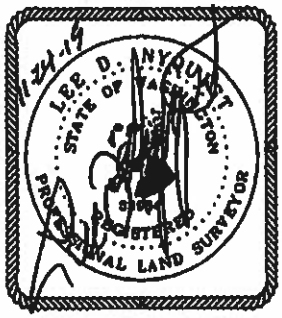
TOGETHER WITH the Northwest Quarter of the Northwest Quarter of Section 29, Township 24 North, Range 8 East, W.M., King County, Washington;

AND TOGETHER WITH that portion of the West Half of the Northeast Quarter of Section 29 Township 24 North, Range 8 East, W.M., in King County, Washington, lying Westerly of 396th Drive S.E. and outside of Tract E of said King County BLA No. L10L0024;

AND TOGETHER WITH that portion of the Northeast Quarter of Section 30, Township 24 North, Range 8 East, W.M., in King County, Washington, lying Northeasterly of S.E. Mill Pond Road, and Easterly of that certain tract of land conveyed to the City of Snoqualmie by Statutory Warranty Deed recorded under Recording No. 9010291617;

EXCEPT Lots A, B and C, City of Snoqualmie Lot Line Adjustment No. LLA15-01 as recorded under Recording No. 20151106900001, records of King County, Washington.

Unofficial Document



Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

DocuSign Envelope ID: 9CE9820F-3DE4-4CDA-A97F-8A5D936B0EF9

When Recorded Mail To:

King County
Department of Natural Resources & Parks
Water and Land Resources Division
201 S. Jackson St., Suite 600
Seattle, WA 98104-3855



20151125001313
STEWART TITLE EAS 94.00
PAGE-001 OF 022
11/25/2015 15:45
KING COUNTY, WA

CONSERVATION EASEMENT

Stewart Title Guaranty Co.
01148-30993

Grantor [Seller]: Snoqualmie Mill Ventures, LLC
Grantee [Buyer]: King County, a political subdivision of the State of Washington.
Legal Description (abbreviated): Section 29 and 30, Township 24 North, Range 8 East, W.M.

Additional legal(s) on Page: See Exhibit A-2
Assessor's Tax Parcel ID#: 302408-9001, 302408-9069 and 292408-9006

This Deed of Conservation Easement ("Deed") is granted on this 24th day of November 2015, by Snoqualmie Mill Ventures, LLC ("Grantor"), to King County, a political subdivision of the State of Washington, ("Grantee").

WHEREAS, Grantor and Grantee make the following recitals:

A. Grantor is the sole owner in fee simple of the real property ("Real Property") legally described in Exhibit A-1, which includes the real property subject to this easement ("Protected Property) legally described in Exhibit A-2, attached to and made a part of this Deed, which consists of approximately 34.05 acres of land located in King County, Washington. A map of the Protected Property is attached to, and made part of this Deed, as Exhibit B. The portion of Grantor's Real Property that is not Protected Property shall be referred to herein as "Retained Property."

B. The Protected Property possesses natural, open space, ecological, scenic, recreational and educational values that are of great importance to Grantor, Grantee, the people of King County and the people of the State of Washington. These values are referred to herein as the "Conservation & Park Values" of the Protected Property. The Conservation & Park Values shall not refer to, nor impact the Grantor's rights with respect to the Retained Property, including without limitation, development rights.

C. The Grantor is conveying the property interest conveyed by this Deed for the purpose of ensuring that, under the Grantee's perpetual monitoring, the Conservation & Park Values of the Protected Property will be conserved and maintained in perpetuity, and that uses of the Protected Property (and not any other property of the Grantor, including the Retained Property) that are inconsistent with these Conservation & Park

EXCISE TAX NOT REQUIRED
King Co. Records Division
By _____ Deputy
Anthony Taylor

Unofficial Copy

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Values will be prevented or corrected. The parties agree, however, that the current use of, and improvements to, the Protected Property are consistent with the conservation purposes of this Deed.

D. The Conservation & Park Values on the Protected Property protected by this Deed are recognized by, and the grant of this Deed will serve, the following clearly delineated governmental conservation policies:

1. The King County Comprehensive Plan and the King County Open Space System plan recognize the importance of protecting open space to conserve King County's natural resources and environmental quality for the enjoyment and benefit of all.

2. R.C.W. 84.34.010, in which the Washington State Legislature has declared "that it is in the best interests of the state to maintain, preserve, conserve and otherwise continue in existence adequate open space lands for the production of food, fiber and forest crops, and to assure the use and enjoyment of natural resources and scenic beauty for the economic and social well-being of the state and its citizens."

3. RCW 64.04.130 and RCW 84.34.210 grant counties the authority to acquire Easements to preserve, conserve and maintain open space, agricultural and timber lands, and RCW 36.70A.090 provides that counties should provide for innovative land use management techniques such as transfer of development rights programs.

4. This easement was funded in part by and is subject to the terms of the Parks Levy authorized by King County Ordinance 17568 and approved by voters in August 2013. The County covenants that the property interest will be used for the purposes contemplated by Ordinance 17568, that the property interest shall not be transferred or conveyed except by deed providing that the property interest shall continue to be used for the purposes contemplated by Ordinance 17568, and that the property interest shall not be converted to a different use unless other equivalent property interest within the County shall be received in exchange therefore.

F. The Grantee is a "qualified conservation organization," as defined by the Internal Revenue Code, and accepts the responsibility of enforcing the terms of this Deed and upholding its conservation purposes forever.

G. Grantor and Grantee do not intend for this Easement to be construed to limit other development rights or uses of Grantor's other real property interests outside of the Protected Property, including without limitation, the Retained Property, as defined below.

NOW, THEREFORE, in consideration of the above and the mutual covenants, terms, conditions and restrictions contained herein, Grantor and Grantee agree as follows:

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1. *Grant of Easement*

Grantor voluntarily conveys and warrants to Grantee, its successors and assigns, and Grantee accepts, as permitted by R.C.W. 64.04.130 and R.C.W. ch. 84.34, a conservation easement (the "Easement") in perpetuity over the Protected Property on the terms and conditions set forth herein exclusively to preserve and protect Conservation & Park Values of the Protected Property and no other real property interests of the Grantor, including the Retained Property.

2. *Purpose*

The purpose of this Easement is to prevent any use of the Protected Property that will impair or interfere with the Conservation & Park Values of the Protected Property. Grantors and Grantee intend that this Easement will confine the use of the Protected Property to such activities as are consistent with the purpose of this Easement and will not confine any use, act, or omission of or on the Retained Property.

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3. *Rights of Grantee*

Provided such rights shall not impair Grantor's rights with respect to the Retained Property or any other real property interests of Grantor other than in the Protected Property, to accomplish the purpose of this Easement the following rights are conveyed to Grantee, its successors and assigns, by this Easement with regards to the Protected Property:

(a) To preserve and protect the Conservation & Park Values of the Protected Property.

(b) To prevent any activity on or use of the Protected Property that is inconsistent with Conservation & Park Values and to require the restoration of such areas or features of the Protected Property that may be damaged by any inconsistent activity or use that is caused by Grantor, pursuant to the remedies set forth in Section 9.

(d) To install informational signs for educational purposes, to give notice of the existence of recreational trails on the property, to inform the public of the sources of funding used to acquire this easement or to establish rules for use of the property.

(e) To allow persons or groups, including Grantee, to enter upon the Protected Property for scientific and educational purposes; and

(f) To conduct survey, site preparation, removal of invasive non-native riparian vegetation, and other activities associated with habitat restoration. Nothing herein shall be deemed to imply any obligation to perform such restoration activities.

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(g) To develop and maintain soft-surface trails for passive recreation as permitted by paragraph 5b) of this Agreement. Nothing herein shall be deemed to imply any obligation to perform such trail activities.

4. *Prohibited Uses by Grantor*

Any activity on or use of the Protected Property inconsistent with the Conservation & Park Values is prohibited, provided such prohibition shall not be deemed to limit the development rights or usage of the Retained Property or Grantor's other real property interests outside of the Protected Property. Without limiting the generality of the foregoing, the following activities and uses of the Protected Property, and not the Retained Property or any other real property interests of Grantor outside of the Protected Property, are expressly prohibited, except as permitted in Sections 3 and 5:

(a) Development Rights. The use of development rights now or hereafter associated with the Protected Property. The parties agree that such rights are removed from the Protected Property only and this provision shall not be applied to the Retained Property or any other real property interests of Grantor.

(b) *Subdivision.* The legal or *de facto* division, subdivision, or partitioning of the Protected Property for any purpose, which shall include, but not be limited to, any subdivision, short subdivision, platting, binding site plan, testamentary division, or other process by which the Protected Property is divided into lots.

(c) *Construction and Improvements.* Grantor is strictly prohibited from the placement or construction, of any buildings, structures, or other improvements of any kind, including, without limitation, fences, utilities, septic systems, communication lines, communication towers, storage tanks and pipelines. Impermanent structures including mobile homes, campers, other live-in vehicles, boats on trailers, horse trailers or other trailers are prohibited on the Protected Property.

(d) *Paving and Road and Trail Construction.* The paving or covering of any portion of the Protected Property with concrete, asphalt, gravel, crushed rock, wood shavings or any other paving or surfacing material or the construction of a road or trail, except that soft-surface trails may be constructed and maintained for passive recreation as permitted by paragraph 5b) of this Agreement. Use of concrete or asphalt for passive recreation trails is expressly prohibited.

(e) *Commercial Development.* Any commercial or industrial use or activity conducted on the Protected Property.

(f) *Surface Alteration.* Any alteration of the surface of the land of the Protected Property, including, without limitation, the excavation or removal of soil, sand, gravel, rock, peat, or sod.

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(g) *Soil Degradation and Water Pollution.* Any use or activity on the Protected Property that causes or is likely to cause significant soil degradation or erosion or significant depletion or pollution of an surface or subsurface waters.

(h) *Wetlands.* Any activity on the Protected Property that changes, disturbs, alters or impairs the plant and animal habitat, ecological value or scenic qualities of a wetland or wetland buffer. These prohibited activities include without limitation artificially draining water into or out of a wetland; grading, filling or compacting wetland soils; conducting domestic animal grazing or agricultural activities of any kind; hunting or trapping; and application of biocides except when determined by the Grantee to be necessary for the eradication of invasive non-native plant species and such application is by the narrowest spectrum, least persistent material appropriate for the target species.

(i) *Ponds, Watercourses and Wells.* The alteration or manipulation of the ponds, water courses, and wells located on the Protected Property, or the creation of new water impoundments, water courses or wells, for any purpose.

(j) *Alteration Surface Water, Subsurface Water or Channeling Water.* Any alteration on the Protected Property of the surface water channels on the Protected Property including the removal of fallen trees, gravel or rocks from a water channel or the damming of the water channel, including the lining of the water channel with rocks, wood, trees, sand bags, or other materials.

(k) *Introduced Vegetation.* The planting or introduction of nonnative species of plants on the Protected Property.

(l) *Removal of Trees.* The pruning, cutting down, or other destruction or removal of trees located on the Protected Property, except as approved by King County, or as necessary to control or prevent hazard, disease or fire or to improve forest health.

(m) *Waste Disposal.* The disposal, storage, or release of hazardous substances, rubbish, garbage, debris, unregistered vehicles, abandoned equipment, parts thereof, or other unsightly or offensive waste or material on the Protected Property. The term "release" shall mean any release, generation, treatment disposal, storage, dumping, burying, abandonment, or migration from off-site. The term "hazardous substances" as used in this Easement shall mean any substances, materials, or wastes that are hazardous, toxic, dangerous, harmful or are designed as, or contain components that are, or are designated as, hazardous, toxic, dangerous, or harmful and/or which are subject to regulation as hazardous, toxic, dangerous or harmful or as a pollutant by any federal, state, or local law, regulation, statute, or ordinance, including, but not limited to, petroleum or any petroleum product.

(n) *Signs.* The placement of commercial signs, billboards, or other commercial advertising material on the Protected Property, except in connection with the sale or lease of the Protected Property.

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(o) *Mineral Development.* Except for recorded mineral rights and reservations, if any, on the Protected Property, Grantor shall not otherwise permit the exploration for, or development and extraction of, any minerals or hydrocarbons.

(p) *Vehicles.* The operation on the Protected Property of motorcycles, dune buggies, all-terrain vehicles, snow mobiles, or other types of off-road motorized vehicles or the operation of other sources of excessive noise pollution on the Protected Property or which may cause resource degradation, provided that the terms of this Section 4(p) shall not limit any such operation of the same on the Retained Property or any other real property interests of the Grantor, if any.

5. *Reserved Rights*

Grantor reserves to itself, and to its personal representatives, heirs, successors, and assigns, any use of, or activity on the Retained Property. Without limiting the generality of the foregoing, Grantor specifically reserves any and all development and usage rights with respect to the Retained Property and this Deed and Easement shall not be interpreted to limit any development or usage rights of the Retained Property. Grantor reserves to itself, and to its personal representatives, heirs, successors, and assigns, any use of, or activity on, the Protected Property that is not inconsistent with the Conservation & Park Values and that is not prohibited herein. Without limiting the generality of the foregoing, Grantor specifically reserves the following uses and activities on the Protected Property:

(a) *Emergencies.* The right to undertake other activities necessary to protect public health, property improvements, or human safety, or which are actively required by and subject to compulsion of any governmental agency with authority to require such activity.

(b) *Recreational Use.* The right to allow passive recreational use and activities, provided that such passive recreational use does not interfere with the Conservation & Park Values of the Protected Property.

6. *Responsibilities of Grantor Not Affected.*

Other than as specified herein, this Deed is not intended to impose any legal or other responsibility on the Grantee, or in any way to affect any existing obligation of the Grantor as owner of the Protected Property. This shall apply to:

(a) *Taxes.* The Grantor shall continue to be solely responsible for payment of all taxes and assessments levied against the Protected Property. Upon five days written notice to the Grantor, the Grantee shall have the right, but not the obligation, to pay any taxes or assessments levied against the Protected Property in accordance with any bill, statement or estimate procured from the appropriate authority. If the Grantee ever pays any taxes or assessments levied against the Protected Property, the Grantor shall reimburse the Grantee for the same, with interest until reimbursed at the lesser of ten percent or the maximum rate allowed by law. The Grantor shall reimburse the Grantee

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for these sums plus any reasonable attorneys fees and court costs incurred to collect such sums.

(b) *Costs, Legal Requirements, and Liabilities.* Grantor retains all responsibilities and shall bear all costs and liabilities of any kind related to the ownership, operation, of the Protected Property, including the maintenance of adequate liability insurance coverage. Grantor shall keep the Protected Property free of any liens arising out of any work performed for, materials furnished to, or obligations incurred by Grantor.

(c) *Remediation.* If, at any time, there occurs, or has occurred, a release in, on, or about the Protected Property of any hazardous substances, Grantors agree to take all steps necessary to assure its containment and remediation, including any cleanup that may be required, unless and to the extent the release was caused by Grantee, in which case Grantee shall be responsible for such remediation. Should Grantor become aware of the release of any hazardous substances, Grantor shall make best efforts to inform Grantee of such release as soon as possible.

(d) *Liability and Indemnification.* Grantor hereby agrees to release, hold harmless, indemnify, and defend Grantee, its officers, employees and agents from and against all liabilities, penalties, costs, losses, damages, expenses, causes of action, claims, demands, judgments or administrative actions, including, without limitation, reasonable attorney's and consultant's fees, arising from or in any way connected with (1) injury to or death of any person, or physical damage to any property, resulting from any act, omission, condition, or other matter related to or occurring on or about the Property, regardless of cause, except to the extent caused by the negligent acts or omissions or willful misconduct of Grantee, its members, officers, directors, employees, agents, contractors, subcontractors, lessees, and sublessees, (2) the violation or alleged violation of, or other failure to comply with, any state, federal, or local law, regulation or requirement, including without limitation, CERCLA and MTCA, by any person other than Grantee, its officers, employees and agents; or (3) the presence or release in, on, from, or about the Protected Property, at any time, of any hazardous substances, unless caused by the Grantee its members, officers, directors, employees, agents, contractors, subcontractors, lessees, or sublessees.

7. *Grantee's Right to Restore the Protected Property*

In the event that any of Conservation & Park Values of the Protected Property are impaired by acts or omissions on the Protected Property, the Grantee shall have the right to restore all or portions of the Protected Property at its sole discretion.

8. *Access*

The general public may use the Protected Property in the manner conveyed by this Easement.

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9. *Enforcement*

Grantee shall have the right to prevent and correct violations of the terms of this Easement as set forth below.

(a) *Notice of Failure.* If Grantee determines that the Grantor is in violation of the terms of this Easement or that a violation is threatened, Grantee shall give written notice to Grantor of such violation and demand corrective action sufficient to cure the violation and, where the violation involves injury to the Protected Property resulting from any use or activity inconsistent with the purpose of this Easement, to restore the portion of the Protected Property so injured to its prior condition in accordance with a plan approved by Grantee.

(b) *Grantor's Failure to Respond.* Grantee may bring an action as provided for in Section 9(c) below if Grantor fails to cure the violation within thirty (30) days after receipt of notice thereof from Grantee; fails to begin curing such violation within the thirty (30) day period under circumstances where the violation cannot reasonably be cured within the thirty (30) day period; or fails to continue diligently to cure such violation until finally cured.

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(c) *Grantee's Action.* Grantee may bring action at law or in equity in a court of competent jurisdiction to enforce the terms of this Easement, to enjoin the violation, *ex parte* as necessary and as allowed under the applicable civil rules, by temporary or permanent injunction, to recover any damages to which it may be entitled for violation of the terms of this Easement or injury to any of the Conservation Values protected by this Easement, including damages for the loss of the Conservation Values; and to require the restoration of the Protected Property to the condition that existed prior to any such injury. Without limiting Grantor's liability therefore, Grantee, in its sole and absolute discretion, may apply any damages recovered to the cost of undertaking any corrective action on the Protected Property. All such actions for injunctive relief may be taken without Grantee being required to post bond or provide other security.

(d) *Immediate Action Required.* If Grantee, in its sole and absolute discretion, determines that circumstances require immediate action to prevent or mitigate significant damage to the Conservation Values of the Protected Property, Grantee may pursue its remedies under this Section 9 without prior notice to Grantor or without waiting for the period provided for cure to expire.

(e) *Nature of Remedy.* Grantee's rights under this Section 9 apply equally in the event of either actual or threatened violations of the terms of this Easement. Grantor agrees that Grantee's remedies at law for any violation of the terms of this Easement are inadequate and that Grantee shall be entitled to the injunctive relief described in this Section 9 both prohibitive and mandatory, in addition to such other relief to which Grantee may be entitled, including specific performance of the terms of this Easement, without the necessity of proving either actual damages or the inadequacy of otherwise available legal remedies. Grantee's remedies described in this Section 9 shall be

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cumulative and shall be in addition to all remedies now or hereafter existing at law or in equity.

(f) *Costs of Enforcement.* All reasonable costs incurred by Grantee in enforcing the terms of this Easement against Grantor, including, without limitation, costs and expenses of suit and reasonable attorney's fees and reasonable consultant's fees, and any costs of restoration necessitated by Grantor's violation of the terms of this Easement shall be borne by Grantors; provided that Grantee must prevail in order to avail itself of this Section 9(f).

(g) *Grantee's Discretion.* Enforcement of the terms of this Easement shall be at the discretion of the Grantee, and any forbearance by the Grantee to exercise its rights under this Easement in the event of any breach of any terms of this Easement by Grantor shall not be deemed or construed to be a waiver by Grantee of such term or of any of Grantee's rights under this Easement. No delay or omission by Grantee in the exercise of any right or remedy upon any breach by Grantors shall impair such right or remedy or be construed as a waiver.

(h) *Acts Beyond Grantor's Control.* Nothing contained in this Easement shall be construed to entitle Grantee to bring any action against Grantor to abate, correct, or restore any condition on the Protected Property or to recover damages for any injury to or change in the Protected Property resulting from causes beyond Grantor's control, including, without limitation, fire, flood, storm, and earth movement, and from any prudent action taken by Grantor under emergency conditions to prevent, abate, or mitigate significant injury to the Protected Property resulting from such causes.

(i) *Grantor's Reservation of Rights and Remedies.* Grantor shall maintain all rights and remedies available at law and equity, including the ability to seek specific performance, other contract remedies and claims for damages arising from or in relation to any of the Grantee's obligations in this Conservation Easement. Nothing in this Subsection 9(i) shall preclude the Grantee from asserting equitable defenses in any claim or cause of action asserted by Grantor.

10. *Alternate Dispute Resolution*

If a dispute arises between the parties concerning the consistency of any proposed use or activity with this Easement, the parties shall attempt to resolve the dispute through informal discussion. The parties may also agree to refer the dispute to mediation. Upon such agreement, the parties shall select a single mediator to hear the matter. Each party shall bear its own costs, including attorney's fees, if mediation is pursued under this Section 10. The parties shall share equally the fees and expenses of the mediator.

11. *Notice and Approval*

(a) *Notice.* Whenever notice is required under this Easement with respect to the Protected Property, the party required to give notice ("Notifying Party") shall give

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reasonable notice prior to the date the Notifying Party intends to undertake the use or activity in question. The notice shall describe the nature, scope, design, location, timetable, and any other material aspect of the proposed activity in sufficient detail to permit the other party to make an informed judgment as to its consistency with the purpose and terms of this Easement. Grantor is not required to give notice under this Easement with regards to any actions taken on the Retained Property or Grantor's other real property interests.

(b) *Evaluation of Proposed Activities.* The purpose of requiring the Notifying Party to notify the other party prior to undertaking certain permitted uses and activities is to afford the other party an opportunity to ensure that the use or activity in question is designed and carried out in a manner consistent with the purpose and terms of this Easement with respect to actions on the Protected Property.

12. *Notice of Transfer of Protected Property by Grantor and Successor and Assigns*

Anytime the Protected Property itself, or any interest in it is transferred by the Grantor to a third party, the Grantor, its successors and assigns, shall notify the Grantee in writing, and the document of conveyance shall expressly refer to this Deed of Conservation Easement.

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13. *Termination of Easement*

(a) *Frustration of Purpose.* If a court of competent jurisdiction determines that conditions located on the Protected Property change so much that it becomes impossible to fulfill any of the Conservation & Park Values, the court may, at the joint request of both the Grantor and Grantee, terminate in whole or in part the Easement created by this Deed.

(b) *Proceeds.* If the Easement is terminated and the Protected Property is sold or taken for public use, the Grantee shall be entitled to a percentage of the gross sale proceed of condemnation award equal to the ratio of the appraised value of this easement to the unrestricted fair market value of the Property, as these values are determined on the date of termination. The Grantee shall use the proceeds consistently with the conservation purposes of this Easement.

14. *Modification*

This Deed may be modified by agreement of the parties, provided that any such amendment shall be consistent with the purpose of the Easement and shall not effect its perpetual duration. All modifications shall be in writing, signed by both parties and recorded in the real property records of King County.

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15. *Interpretation*

This Deed shall be interpreted under the laws of Washington, resolving any ambiguities and questions of the validity of specific provisions so as to give maximum effect to its conservation purposes.

16. *Perpetual Duration*

This Easement created by this Deed shall be a binding servitude running with the land in perpetuity, and no merger of title, estate or interest shall be deemed effected by any previous, contemporaneous, or subsequent deed, grant, or assignment of an interest or estate in the Protected Property, or any portion thereof, to Grantee, it being the express intent of the parties that this Easement not be extinguished by, or merged into, any other interest or estate in the Protected Property now or hereafter held by Grantee. Every provision of this Deed that applies to the Grantor or Grantee shall also apply to their respective agents, heirs, executors, administrators, assigns, and all other successors as their interests may appear.

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17. *Inaction*

Inaction or inactivity on the part of Grantee with respect to the Easement shall not constitute abandonment of the Easement.

18. *Notices*

Any notices required by this Deed shall be in writing and shall be personally delivered or sent by first class mail to Grantor and Grantee respectively at the following addresses, unless a party has been notified by the other of a change of address.

To Grantor:

Snoqualmie Mill Ventures, LLC
4119 East Lake Sammamish Parkway
Sammamish, WA 98075

To Grantee:

King County Department of Natural Resources & Parks
Water and Land Resources Division
201 South Jackson Street, Suite 700
Seattle, WA 98104

19. *Grantor's Title*

Grantee shall take this Easement subject to any and all easements, covenants, conditions, restrictions, encumbrances and other matters of record as of the date hereof.

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20. *Severability*

If any provision of this Deed is found to be invalid, illegal or unenforceable, that finding shall not affect the validity, legality or enforceability of the remaining provisions.

21. *Acceptance*

The Grantee hereby accepts this Grant of Deed of Conservation Easement.

22. *Entire Agreement*

This instrument sets forth the entire agreement of the parties with respect to the terms of this Easement and supersedes all prior discussions, negotiations, understandings, or agreements relating to the terms of this Easement, all of which merge herein.

23. *Waiver of Defenses*

Grantor hereby waives any defense of laches, estoppel or prescription and acknowledges and agrees that the ten-year statute of limitations provided in RCW 4.16.020 does not apply to this Easement, and Grantor waives any rights of Grantor pursuant to such statute.

24. *Subordination*

Grantor certifies that all mortgages and deeds of trust (collectively "Liens"), if any, affecting the Protected Property are subordinate to, or shall become subordinate to, the rights of Grantee under this Easement. Grantor has provided, or shall provide, a copy of this Easement to all mortgagees, and to all beneficiaries and/or trustees of deeds of trust (collectively "Lienholders"), already affecting the Protected Property or which will affect the protected Property prior to the recording of this Easement, and shall also provide notice to Grantee of all such Liens. Each of the Lienholders has subordinated, or shall subordinate prior to recordation, the Liens to this Easement either by signing a subordination agreement contained at the end of this Easement, which shall become a part of this Easement as Exhibit C and recorded with it, or by recording a separate subordination agreement pertaining to any such Lien which must meet the approval of Grantee.

[Signatures attached.]

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In Witness Whereof, the Grantor and Grantee, intending to legally bind themselves, have set their hands on the date first written above.

Grantor: Snoqualmie Mill Ventures, LLC, a Washington limited liability company:

BY: _____
Name: S.T. RUMMER
Title: MEMBER

Grantee: King County, a political subdivision of the State of Washington:

BY: Signed in Counterpart
Christie True , Director
Department of Natural Resources & Parks

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In Witness Whereof, the Grantor and Grantee, intending to legally bind themselves, have set their hands on the date first written above.

Grantor: Snoqualmie Mill Ventures, LLC, a Washington limited liability company:

BY: signed in counterpart
Name: _____
Title: _____

Grantee: King County, a political subdivision of the State of Washington:

BY: _____
for Christie True, Director
Department of Natural Resources & Parks

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STATE OF WASHINGTON }
} SS
COUNTY OF KING }

On this 23rd day of November, 2015, before me, the undersigned, a Notary Public in and for the State of WASHINGTON, duly commissioned and sworn personally appeared Stephen T. Remmer, to me known to be the individual described in and who executed the foregoing instrument, and acknowledged to me that ~~she~~ he signed and sealed the said instrument as ~~her~~ his free and voluntary act and deed for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

MARY I. SAWCHUK
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
NOVEMBER 19, 2017

Mary I. Sawchuk
Mary I. Sawchuk
Notary Public in and for the
State of Washington, residing

At Sammamish, WA
City and State

My appointment expires NOV. 19, 2017

Unofficial Copy

STATE OF WASHINGTON }
} SS
COUNTY OF KING }

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of _____, duly commissioned and sworn personally appeared _____, to me known to be the individual described in and who executed the foregoing instrument, and acknowledged to me that she signed and sealed the said instrument as her free and voluntary act and deed for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the
State of Washington, residing

At _____
City and State

My appointment expires _____

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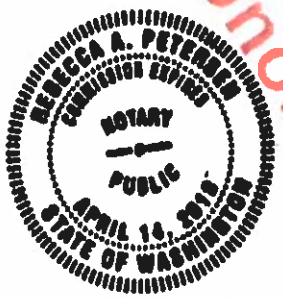
STATE OF WASHINGTON }
} SS
COUNTY OF KING }

On this 24 day of November, 2015, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn personally appeared Kathryn Tetz, to me known to be the individual described in and who executed the foregoing instrument, and acknowledged to me that she signed and sealed the said instrument as her free and voluntary act and deed for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.



Notary Public in and for the
State of Washington, residing

At Bellevue WA
City and State

My appointment expires 4/14/18

Unofficial Copy

STATE OF WASHINGTON }
} SS
COUNTY OF KING }

On this _____ day of _____, 2015, before me, the undersigned, a Notary Public in and for the State of _____, duly commissioned and sworn personally appeared _____, to me known to be the individual described in and who executed the foregoing instrument, and acknowledged to me that she signed and sealed the said instrument as her free and voluntary act and deed for the uses and purposes therein mentioned.

WITNESS my hand and official seal hereto affixed the day and year in this certificate above written.

Notary Public in and for the
State of Washington, residing

At _____
City and State

My appointment expires _____

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EXHIBIT A-1

WHOLE PROPERTY
LEGAL DESCRIPTION

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November 24, 2015

LEGAL DESCRIPTION

FOR

SNOQUALMIE MILL VENTURES LLC

SMV PROPERTY POST-FEE PROPERTY TRANSFER

Lot 1, Tract C and Tract E, King County Boundary Line Adjustment and Large Lot Segregation No. L10L0024, as recorded under King County Recording No. 20100630900006; located in portions of Sections 20, 29 and 30, Township 24 North, Range 8 East, W.M., in King County, Washington;

TOGETHER WITH the Northwest Quarter of the Northwest Quarter of Section 29, Township 24 North, Range 8 East, W.M., King County, Washington;

AND TOGETHER WITH that portion of the West Half of the Northeast Quarter of Section 29 Township 24 North, Range 8 East, W.M., in King County, Washington, lying Westerly of 396th Drive S.E. and outside of Tract E of said King County BLA No. L10L0024;

AND TOGETHER WITH that portion of the Northeast Quarter of Section 30, Township 24 North, Range 8 East, W.M., in King County, Washington, lying Northeasterly of S.E. Mill Pond Road, and Easterly of that certain tract of land conveyed to the City of Snoqualmie by Statutory Warranty Deed recorded under Recording No. 9010291617;

EXCEPT Lots A, B and C, City of Snoqualmie Lot Line Adjustment No. LLA15-01 as recorded under Recording No. 20151106900001, records of King County, Washington.

Unofficial Copy

11-24-15
LEE D. NYLUND
STATE OF WASHINGTON
REGISTERED
PROFESSIONAL LAND SURVEYOR

Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

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EXHIBIT A-2

PROTECTED PROPERTY
LEGAL DESCRIPTION

Unofficial Copy

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October 22, 2015

LEGAL DESCRIPTION

FOR

SNOQUALMIE MILL VENTURES, LLC

Unofficial Copy

CONSERVATION EASEMENT

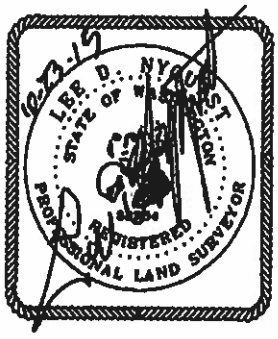
Lot 2 King County Boundary Line adjustment and Large Lot Segregation No. L10L0024, as recorded under Recording No. 201006309000006 and amended under Recording No. 2012070290002 also being a portion of the Northwest Quarter of the Northwest Quarter of Section 29, Township 24 North, Range 8 East, W.M., King County, Washington.

TOGETHER WITH that portion of the Northeast Quarter of the Northeast Quarter of Section 30, Township 24 North, Range 8 East, W.M., in King County, Washington, lying Northeasterly of S.E. Mill Pond Road, and Easterly of the certain tract of land conveyed to the City of Snoqualmie by Statutory Warranty Deed recorded under Recording No. 9010291617;

EXCEPT that portion thereof lying South of the following described line:

BEGINNING at the Northeast corner of said Section 30;
Thence N 89°04'51" W, along the North line thereof, a distance of 913.57 feet to the East line of said tract conveyed to the City of Snoqualmie;
Thence S 00°55'09" W along said East line 654.35 feet to an angle point in said East line and the TRUE POINT OF BEGINNING of the herein described line;
Thence S 89°04'51" E a distance of 2252.91 feet to the East line of said Lot 2 and the terminus of the herein described line;

Parcel contains approximately 1,483,238 square feet or 34.05 acres.



Prepared by:	
Checked by:	

GOLDSMITH
LAND DEVELOPMENT SERVICES

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EXHIBIT B

PROTECTED PROPERTY MAP

Unofficial Copy

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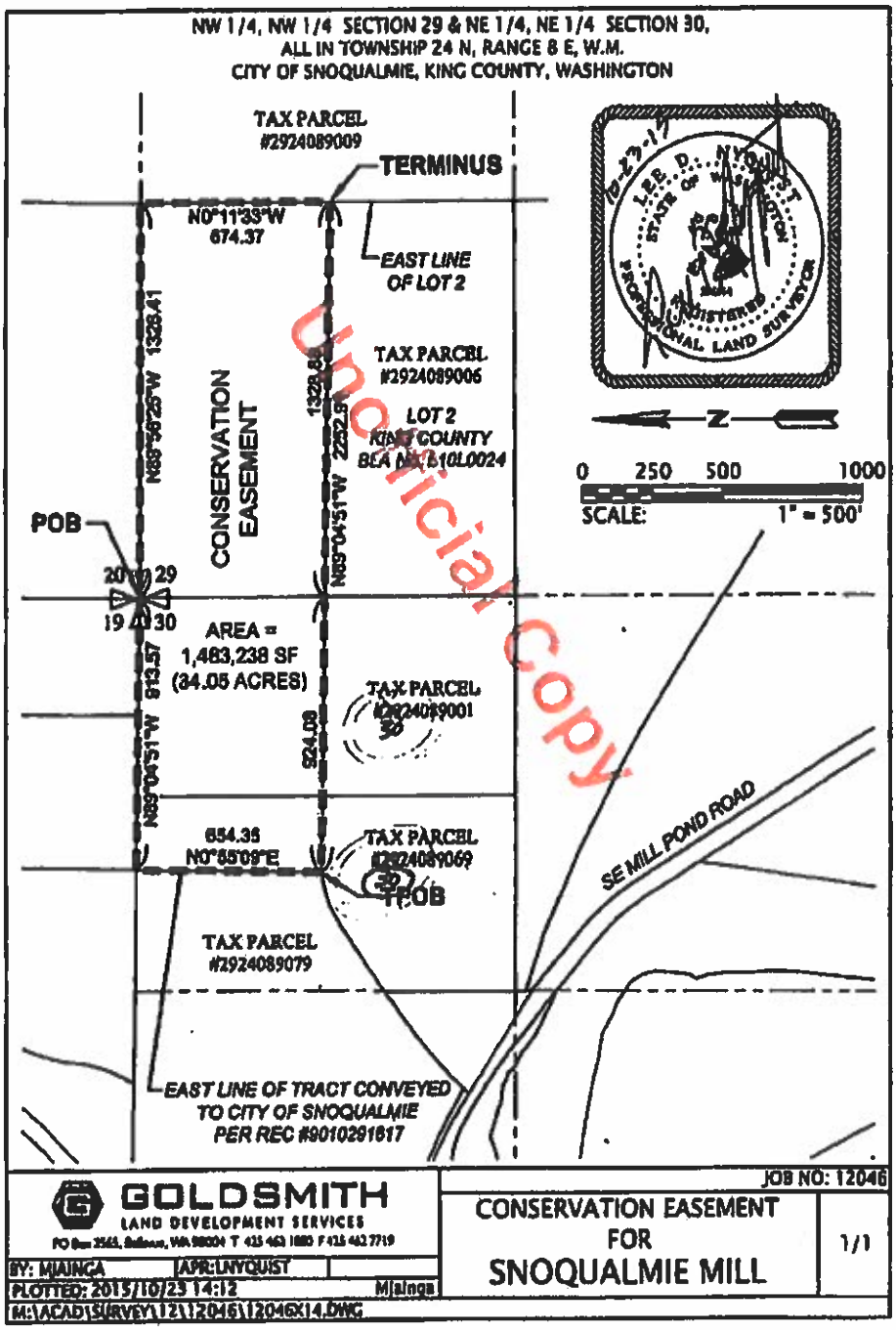

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Subject: Please DocuSign: KC Comment Letter Snoqualmie Mill PCI Plan DEIS 6_9_2020_final.pdf, 2015112500...
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Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Envelope Originator:
Rogelio Diaz-Mendez
130 Nickerson St
Suite 100
Seattle, WA 98109
rodiaz@kingcounty.gov
IP Address: 198.49.222.20

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Signer Events	Signature	Timestamp
Warren Jimenez wjimenez@kingcounty.gov Division Director King County Parks Security Level: Email, Account Authentication (None)	DocuSigned by: A1498C6DA09E48F...	Sent: 7/9/2020 2:00:35 PM Viewed: 7/9/2020 2:04:05 PM Signed: 7/9/2020 3:33:03 PM
	Signature Adoption: Drawn on Device Using IP Address: 198.49.222.20	

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Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp
Kelly Heintz Kelly.Heintz@kingcounty.gov King County Parks Security Level: Email, Account Authentication (None)	COPIED	Sent: 7/9/2020 2:00:35 PM
M. Hoffman MHofman@snoqualmiewa.gov Security Level: Email, Account Authentication (None)	COPIED	Sent: 7/9/2020 3:33:07 PM Viewed: 7/9/2020 4:47:21 PM

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Electronic Record and Signature Disclosure:
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Carbon Copy Events	Status	Timestamp
Monica Leers Monica.Leers@kingcounty.gov ng County Parks curity Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 7/9/2020 3:33:08 PM

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	7/9/2020 3:33:08 PM
Certified Delivered	Security Checked	7/9/2020 3:33:08 PM
Signing Complete	Security Checked	7/9/2020 3:33:08 PM
Completed	Security Checked	7/9/2020 3:33:08 PM

Payment Events	Status	Timestamps

Letter No.7

Mark Hofman

From:	Ortiz, Catherine <Cathy.Ortiz@kingcounty.gov> on behalf of Chan, Jim <Jim.Chan@kingcounty.gov>
Sent:	Friday, July 10, 2020 5:34 PM
To:	Mark Hofman
Cc:	Rick Rudometkin; Smith, Lauren; Reid, Jacqueline; Barton, Chase
Subject:	Comments for the Snoqualmie Mill from King County Permitting Division Director
Attachments:	Snoqualmie Mill Final Comment Letter from King County 7_13_2020.pdf
Categories:	Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman:

This comment letter is being sent on behalf of Jim Chan, Director for the Permitting Division in the Department of Local Services.

Thank you.

Sincerely,

Cathy Ortiz
Executive Assistant to Jim Chan
Department of Local services – Permitting division
35030 SE Douglas Street, Ste 210
Snoqualmie, Washington 98065
206-477-0353

King County
Permitting Division
Department of Local Services
35030 SE Douglas Street, Suite 210
Snoqualmie, WA 98065-9266
206-296-6600 | Relay: 711
https://kingcounty.gov/permits

July 13, 2020

Mr. Mark Hoffman
SEPA Responsible Official
mhofman@snoqualmiewa.gov
City of Snoqualmie
PO Box 987
Snoqualmie, WA, 98065

RE: Draft Environmental Impact Statement for the Proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

Dear Mr. Hoffman:

Thank you for the opportunity to review the City of Snoqualmie's draft Environmental Impact Statement (DEIS) for the Proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. The County has been interested in seeing the City's proposed plan for the site, and the DEIS provides substantive information on the how the property, in its existing configuration, will transition to a planned commercial and industrial development in phases. The County appreciates that there are a number of steps before the City approves development on the site, and that, with these subsequent steps, there will be opportunities for the County to provide formal comment to the City.

Our review of the information in the DEIS on the proposed plan, and the DEIS' analysis of direct, indirect and cumulative impacts with the three plan alternatives, has been completed in consideration of a number of factors. Since part of the plan's area includes land that is still under the jurisdiction of King County, and areas adjacent to the site are also under the jurisdiction of the County, this has informed our review of the proposal, and the analysis of, and mitigation proposed for potential impacts. Additionally, the City serves as the water utility supplying residents of unincorporated King County in proximity to the City, and properties that may develop within the service area in the future. Analysis of the proposed plan on water supply and demand is another area of focus.

Parameters for development of the Snoqualmie Mill site are included in the interlocal agreement (ILA) between the city of Snoqualmie and King County regarding annexation of a portion of the Snoqualmie Mill planning area, adopted by each jurisdiction in 2012. Review of the interlocal agreement has also informed our review of the DEIS.

The following sections identify areas of the DEIS where the County has questions and comments, following review of the document across different County business areas.

1) Review for Consistency with the 2012 Interlocal Agreement Between the City of Snoqualmie and King County Regarding the Annexation of a Portion of the Snoqualmie Mill Planning Area

Pursuant to the "2012 Interlocal Agreement Between the City of Snoqualmie and King County Regarding the Annexation of a Portion of the Snoqualmie Mill Planning Area", [1] the City assumed responsibility for providing appropriate consideration to the surrounding rural areas for impacts emanating from the uses of the subject property. The City also pledged to continue to work with owners and lessees of the property to protect the character of the surrounding rural area, as follows:

> ***WHEREAS**, as acknowledged by the City, one of the objectives of the Pre-Annexation Agreement is to provide appropriate consideration to the surrounding rural areas for impacts emanating from the uses on the Property; and*
>
> ***WHEREAS**, the City will continue to work with owners and lessees of the Property to protect the rural character of the surrounding rural area and to minimize impacts such as noise, light, glare, vibrations, and traffic from activities on the Property; and*
>
> ***WHEREAS**, the City agrees to work with the County to ensure residents of the surrounding rural area are notified of any land use planning activities on the Property and will have the ability to participate in applicable public comment opportunities;*

7-1

Section Two of the DEIS, Proposals and Alternatives, mentions "…prior planning and interlocal agreements between King County and the City…" (p. 2.8). This would appear to be the sole reference in the document encompassing the interlocal agreement that includes provisions for annexation of a portion of the Snoqualmie Mill site, signed by both the City and the County in 2012. Section 3.7 of the DEIS, Consistency with Plans and Policies, does not consider the proposed plan for consistency with the ILA.

This omission means that no analysis is provided in the DEIS that specifically addresses how the plan is consistent with provisions in the ILA, including the recitals in the jointly adopted instrument.

[1] http://mrsc.org/getmedia/7b7c7ee7-4a4d-4c78-aad8-59a1d25b8ce2/s63r1144.pdf.aspx

The County would like to see analysis of the consistency of the PCI plan with the 2012 annexation ILA. Subsequent comments in this comment letter are framed by the provisions in the ILA between the City and the County. (However, absence of commenting on provisions included in the ILA does not represent the County agreeing that those provisions have been adequately addressed in the DEIS for consistency.) 7-1

2) Water Supply

The DEIS identifies that additional water sources and/or some upgrading of parts of the existing water system may be needed to serve some portion of projected growth. The DEIS says that it contains a detailed discussion of supply and estimated demand for water associated with the proposal.

The City of Snoqualmie provides water services to the development site and to nearby parts of unincorporated King County. However, the DEIS does not describe the implications to service provision to the customers in unincorporated King County when it talks about how the City is "over-committed" in water allocations, yet still proposing to serve this site. (p. 3-397) 7-2

The mitigation strategy identified in the DEIS is to add new water rights. Applications for additional water and groundwater rights along the Snoqualmie River will be junior to the river's instream flow requirements and will almost certainly require mitigation sources, and likely be unavailable during periods of diminished flows.

The County is concerned about the resultant lack of supply which will likely have a disproportionate impact on rural users and future connections in the unincorporated area. The County would like to see further analysis of the impacts of the proposal on water availability for current and future customers in the City's service area in unincorporated King County, and how the impacts will be mitigated.

3) Noise

The "Redevelopment Alternative" included in the DEIS includes an outdoor performance space, possibly an amphitheater, with a constructed stage and a capacity of five thousand. The DEIS indicates that an average of two performances per week are assumed, from June through September, typically on weekend evenings. The DEIS indicates that no noise mitigation measures are required from the proposed project and alternative, and that no significant unavoidable adverse impacts are anticipated. It says that, with respect to the amphitheater, this is because it is expected to comply with applicable sound level limits. However, an earlier statement indicates that there will be a requirement to comply with City of Snoqualmie and King County noise limits at all time "...unless a noise variance is granted by the City". (p. 3-337) 7-3

If the City is considering that issuing a noise variance may be an instrument to consider for operation of the amphitheater, it indicates that significant unavoidable adverse impacts may be anticipated. The County would like to see further discussion of how regulations will be applied to the operation of the amphitheater resulting in no significant adverse impacts, when issuing variances is also under consideration.

7-3

The County would also like to see discussion of the proposal for an amphitheater in the context of the content of the 2012 annexation ILA between the City and the County. As identified earlier, the ILA says that: "... the City will continue to work with owners and lessees of the Property to protect the rural character of the surrounding rural area and to minimize impacts such as noise, light, glare, vibrations, and traffic from activities on the Property..." "Interested Parties" are identified on the Distribution List for the DEIS in Section 6.0. (p. 6.2).

The County would like to see discussion of how the ILA's statement that residents of the surrounding rural area will be notified of any land use planning activities on the site has been satisfied. It may be that the identified "Interested Parties" in the DEIS are residents of the surrounding rural area. However, as the DEIS has not included discussion of consistency of the Plan proposals with the ILA, it is not clear whether or not this is the case.

7-4

4) Floodplains

Portions of the proposed development are located in areas mapped by King County as Channel Migration Hazard Zones. A King County revetment ("Mill Pond") is located between the proposed development and the Snoqualmie River. Because the facility is a revetment, it does not limit the extents of flooding. Also, this facility is not considered a boundary to channel migration. Channel migration hazard areas extend landward of the facility. Caution should be applied when considering the placement of new infrastructure, such as sole access roads and utilities, in close proximity to the Snoqualmie River and its flood and channel migration hazard areas.

7-5

Portions of the proposed development are located in the FEMA Floodway. A FEMA Floodway No-Rise analysis will be necessary to demonstrate that the development as proposed meets all requirements for any development in the floodway. Specifically, we note several lacking items in the Snoqualmie Mill PCIP – No Net Rise Hydraulic Analysis provided in Appendix A:

7-6

- The Memorandum was not certified or sealed.
- The analysis did not include an assessment of the floodway profile. Both the base flood and floodway profile shall be checked for any increase in flood levels. See Section 11.3, FEMA Guidance Document 79, Floodway Analysis and Mapping, November 2019.

- Detailed hydraulic modeling information, including technical data and assumptions, was not provided. Prior to permitting, a Professional Engineer acting on behalf of the City of Snoqualmie Floodplain Administrator should review the hydraulic modeling to assure it was performed in accordance with standard engineering practice. 7-6

If the planned proposal is reliant on future submissions for regulatory map revisions that result in changes to the floodway or floodplain in unincorporated King County, FEMA requires a Community Acknowledgement form be included with the submitted map revision materials. As a potentially affected community, King County will need to review the technical documentation that is the basis for this remapping to assure agreement with the proposed map revisions before the acknowledgement can be signed and provided to the City and FEMA. 7-7

Site plans should clearly identify the extent of the regulatory floodplain, including those areas technically removed from the floodplain by an approved Letter of Map Amendment from FEMA (e.g.: 16-10-0081A), when illustrating the location and extent of proposed development and other regulatory hazards areas (e.g. channel migration hazard, floodway).

The DEIS should clearly identify how proposed development at the site within the 2012 annexation area conforms to Section 8 of the ILA between the City and County that states "The City agrees to advance the policies and standards set forth in the King County Comprehensive Plan relative to designated floodplain lands." This effort should consider the 2006 King County Flood Hazard Management Plan (and 2013 progress update) which serves as a functional plan of the KC Comprehensive Plan, outlining floodplain management policy and programs across unincorporated King County. 7-8

The DEIS shows stormwater drainage outfalls are proposed through the King County Mill Pond revetment. King County will need to review and approve the designs for these outfalls as new infrastructure. Also, the ongoing maintenance of new outfalls should be addressed in the DEIS. 7-9

5) Environmental Health

In the County's review of the Environmental Health section of the DEIS, there are several areas where we would like to see additional information.

a) The plan identifies that only basic treatment is proposed for direct stormwater to discharges to the Snoqualmie River. (p. 1-15) While this is allowed under provisions in the King County Surface Water design manual, basic treatment is only treating suspended solids (TSS). The increased impervious areas and especially roadways would be expected to lead to other contaminants being directly conveyed to the Snoqualmie River. It is likely that the most critical of these would be dissolved copper, zinc, and the chemicals in tires which are responsible for pre-salmon 7-10

mortality. Downstream reaches of the river basin have been relatively free from prespawn salmon mortality to date. Protecting downstream salmon populations is a King County priority and it would be helpful to provide water quality data and design information to support the conclusion that the stormwater discharges will not have adverse impacts on salmonid or other aquatic species. 7-10

b) The DEIS says that under the proposal, stormwater quality is expected to improve over current conditions. (p. 1-40) The County would like to see the basis for this conclusion as monitoring data have not been included. 7-11

c) The DEIS identifies liquefaction during an earthquake as a risk, (p. 3-15), and the County would like to see more information on the impact on this hazard from the large-scale grading that would be required under the plan, and mitigation measures associated with liquefaction risk. For example, it is not clear in the DEIS where the liquefaction hazard areas are and their significance. This is especially important as it relates to sloughing of bank materials into the mill pond and disturbance of contaminated sediments within the pond. 7-12

d) Where the DEIS identifies a need for lift stations to convey sewage to the treatment plant, the plan should identify what provisions will be made to avoid any discharges to the river during power outages. (p. 2-29) 7-13

e) The DEIS identifies that no industrial activities happened in Planning Area 1 and it was only used for log storage. (p. 3-137) The text does not discuss if these were treated logs and if pentachlorophenol and creosote may have been released in Planning Area 1. It is unclear if confirmation testing has been completed in this area to verify that the soils are clean enough for residential uses. (see below)

f) The DEIS discusses "chlorophenolic compounds for small-scale lumber treatment using dip tanks". (p. 3-140) This implies that prior industrial activities included treating lumber with creosote. Given the toxicity of creosote, (a mixture of compounds that includes dioxins and furans), the County would like to see data on contamination from use of creosote, including presence of toxins in fish, other aquatic species, and plants that may be present in Borst Lake and the lake sediments. 7-14

Creosote from a historic facility such as this property is a very stable mixture of many toxic compounds with a very long half-life of decades. Access to Borst Lake is unrestricted right now, and if residential housing units are going to be placed on the Snoqualmie Mill site, this is likely to create more human exposure than currently exist. As far as the County is aware, the only restricted access area is the fenced boiler ash pile in Planning Area 3. The County would like to see more information on the risk from contaminants under the plan and how the redevelopment reduces exposures and ultimately remedies historic contamination.

g) The DEIS includes discussion on balancing cuts and fills for grading purposes. More discussion of exactly how much soil requires remediation in Planning Areas 2 and 3 would be helpful. For example, if soils in Planning Areas 2 and 3 require remediation and the volumes are more than can be accommodated in an off-site landfill, then these limitations and the need for an on-site disposal facility can be balanced with the redevelopment of the whole property. The discussion of the implications of the costs and benefits of remedial actions in Planning Areas 2 and 3 (p. 3-145) are disconnected in the DEIS from the discussion of the benefits of development in Planning Area 1. This makes it challenging to compare benefits and costs of actions across the three planning areas and for the entire property. 7-15

6) Transportation

Though the Snoqualmie Mill phased proposal will likely have negligible traffic impacts, overall, to unincorporated King County roads located in the vicinity of the proposed development, King County requests enhanced traffic management coordination with the City, in advance of and during special events that may take place on the site, to lessen the likelihood of unintended traffic impacts to nearby unincorporated King County roads that serve nearby neighborhoods and rural communities. 7-16

King County will look forward to the future opportunities for reviewing and commenting on products developed for subsequent phases of the plan approval process, as the plan progresses through the City Planning Commission and the City Council review stages.

If you have any questions concerning the comments included in this letter, I can be reached at Jim.Chan@kingcounty.gov or by telephone at 206-477-0385. Thank you again for the opportunity to review the City's DEIS for this ambitious, multi-faceted planning proposal for the Snoqualmie Mill site.

Sincerely,

Jim Chan
Division Director

cc: The Honorable Rick Rudometkin, City Administrator, City of Snoqualmie
rrudometkin@snoqualmiewa.gov
Lauren Smith, Director of Regional Planning, King County Executive's Office
Jacqueline Reid, Project/Program Manager IV, Permitting Division Department of Local Services
Chase Barton, Engineer IV, Department of Natural Resources and Parks

DDES
King County
Department of Development
and Environmental Services
900 Oakesdale Avenue Southwest
Renton, WA 98055-1219

To: Randy Sandin

From: Kathy Newborn

Date: 07/18/01

Re: E9900507 – Snoqualmie Log yard

I have completed my review of this case and briefly summarize my conclusions below. I reviewed the enforcement file, associated grading permit file, interviewed Manuela Winter and representatives of Walker and Associates, and conducted a study of aerial photographs from years 1970, 1976, 1985, 1990 and 1995.

The DDES aerial photos show evidence of filling over the years and it is possible to establish a change in baseline elevation from the photos with a photogrammetric study, however that would cost approximately $3000-$5000 per year for analysis. To establish an elevation change using stereoscopic study only is not possible due to the scale of the photos.

It can be argued that King County DDES gained regulatory jurisdiction over Weyerhaeuser's log yard filling activity as early as 8/10/70 (please see Manuela Winter's attached report), but Weyerhaeuser was clearly out of compliance as of 2/16/73 when King County passed Ordinance No. 1527, regulating flood hazard areas. However, because this ordinance was not enforced until flood hazard areas were mapped by FEMA, 9/29/78 becomes the effective date of enforcement.

According to Table 2 of Weyerhaeuser's history of the Snoqualmie log yard (also attached), the majority of fill to establish the log handling area was placed between 1970 and 1979. The yard floor was filled with 1,742,366 cu. yds. to 8' deep during this time, with 1,097,066 cu. yds. placed in 1979. There was also an estimated average of 30,740 cu.yds. of bark from logging operations dropped to the yard floor each year during operations. In addition, "The Monument", a self-described debris pile grew to cover an area of 9 acres at a depth of 20' above the log yard floor. According to the report, "The Monument" area was filled to capacity in 1975. It still exists to date, but the elevation has subsided to around 14' due to wood waste decomposition.

It seems that the numbers that Weyerhaeuser have provided DDES regarding fill volumes, especially those occurring in 1979 after the effective date of enforcement, should be sufficient evidence for going forward with a Notice and Order with a more detailed assessment of fill volumes being obtained through the discovery process.

Please let me know if you have questions or if I can be of further assistance.

King County
Surface Water Management Division
Department of Public Works
Yesler Building
400 Yesler Way - Room 400
Seattle, WA 98104-2637
(206) 296-6519

RECEIVED
DEC - 4 1992
CITY OF
SNOQUALMIE

December 1, 1992

Mr. Kim Wilde
City Administrator
City of Snoqualmie
Post Office Box 987
Snoqualmie, WA 98065

RE: Comments on Flood Hazard Reduction Plan (FHRP) Policy FP-2

Dear Mr. Wilde:

Thank you for sending suggested language (enclosed) for amending Policy FP-2. I apologize for the delay in sending you a response.

Policy FP-2 in the draft FHRP recommended that "new development and substantial improvement" be prohibited in the "one-foot floodway." At the suggestion of several cities, the Surface Water Management (SWM) Division clarified this policy to state that "new subdivisions, residential and commercial developments, and substantial redevelopment of residential structures should be prohibited in the 'one-foot floodway.'" Under the revised policy, substantial improvements to commercial structures would still be allowed as long as the improvements are consistent with applicable flood hazard reduction policies and regulations. I had hoped this would address Snoqualmie's concern that commercial buildings in the downtown core could not be reconstructed if they were substantially damaged by flood or fire.

The revision you are suggesting would condition, rather than prohibit, new commercial development in the floodway, one of the conditions being that "the development is not in a hazardous area as described in Policy G-1."

Based on past discussions we have had, I believe we are in agreement that new development in areas with deep, fast-flowing water should be prevented. The problem is that the Flood Insurance Rate Maps we use to regulate these hazard areas are not always accurate. I do understand the City of Snoqualmie's specific concern that new development in the downtown core would be prohibited in areas that are not actually high-hazard areas. I am concerned that the revisions you suggest would weaken the primary intent of the policy, however, which is to prohibit certain types of development in the Federal Emergency Management Agency (FEMA) floodway.

Another reason I am reluctant to include the revisions you have suggested is that they conflict with King County's adopted Sensitive Areas Ordinance. I have, therefore, decided not to include the specific language changes to FP-2 that you have suggested.

I am hopeful this issue will be resolved as we work toward improving the accuracy of the FEMA maps. Due to your successful efforts at securing assistance from FEMA, this should soon be a reality for the City of Snoqualmie. For other areas, the FHRP policies include direction for the County to collect the data necessary to develop accurate flood hazard maps (see Policy WM-2).

In order to keep you up to date on other policy revisions, I have included the latest version of the FHRP Policies. We are planning to transmit the Executive Proposed FHRP in late December; therefore, I do not anticipate any major changes to these policies prior to transmittal.

In closing, I would like to thank you as well as Mayor Hansen and other City staff for the time and attention you have dedicated to reviewing the FHRP Policies. Although we may not agree on this particular policy, I believe we did reach an unprecedented level of agreement on many of the other policies. I look forward to continuing to work closely with you in the future. If you have any questions, please call me at 296-6585 or Dave Clark, Manager of the SWM Division's River Management Section, at 296-8388.

Sincerely,

Jim Kramer
Manager

JK:MS:tv
F16:LT3.1

Enclosure

cc: Jeanne Hansen, Mayor, City of Snoqualmie
ATTN: LeRoy Gmazel, Community Development Director
Pat Anderson, City Attorney
Dave Clark, Manager, River Management Section
ATTN: Megan Smith, Project Manager
Tom Bean, Senior Engineer

TABLE 3: TOPOGRAPHIC DATA - SOURCES and COMPARATIVE FEATURES

FEATURE	1953 USGS 7.5' Topographic Quad	1985 Topographic Drawing	1991 Topographic Map	1992 Topographic Drawing
Source	U.S.G.S.	Walker & Associates	Source Unknown	Source Unknown
Map Scale	1" = 2,000'	1" = 100'	1" = 200'	1" = 100'
Contour interval	10 feet	2 feet	2 feet	2 feet
Area Covered	Entire millsite and town of Snoqualmie	Mill Pond Road and approximately 700 feet into log yard.	Entire Weyerhaeuser property including log yard and wood products manufacturing site.	Mill Pond Road and approximately 500 feet into the log yard.
Overview Comments	No log yard development, Site is a shallow bowl with a portion possibly below 410' and a larger portion possibly sloping upward to 420'. An average original log yard floor elev. of 412' could be easily be assumed. A 420' contour line sweeps close by the location of the former guardhouse on the mill site access road.	Focus of map is Mill Pond Road, the 'Berm' immediately to the east, plus the log yard surface up to about 700' east of the road. Detail begins at the mill pond on the south and continues northwesterly to the main site access road. Approx. 100 elevation points are shown across the property. The average log yard surface appears to be about 420' elev. Scattered piles of yard debris are easily discernable and have elevations to as high as 436'. No contouring of the east side of the berm is apparent.	Map covers entire property and includes the mill pond to the south and the City of Snoqualmie treatment ponds to the north. Map includes a great amount of detail. Some elevations immediately to the east side of the berm could be interpreted as contouring of the yard surface.	Map focus is Mill Pond Road and the 'Berm' immediately to the east plus the log yard surface up to about 500' east of the road. Detail begins at the mill pond on the south and continues northwesterly to a point about 600' before the main site access road. Some elevations immediately to the east side of the berm could be interpreted as contouring of the yard surface.

FEATURE	1953 USGS 7.5' Topographic Quad	1985 Topographic Drawing	1991 Topographic Map	1992 Topographic Drawing
Mill Pond Road	In existence & approx. 420' elevation at the entry to the log yard.	Elevations vary from 413' to 419'. An average of 416' could be interpreted.	Specific elevations are not shown but rather must be interpolated from adjacent contours and various benchmarks.	Elevations vary from 412' to 419'. An average of 416' could be interpreted.
Conclusions	No log yard fill introduced to the site. Wood products mill site is fully developed in terms of elevation.	Log yard floor is fully developed in terms of elevation and log yard is operating.	Log yard floor has not changed in elevation. Site is not being used for log handling.	Log yard floor has not changed in elevation. Site is not being used for log handling.

Doc # 8

King County
Surface Water Management Division
Department of Public Works
Yesler Building
400 Yesler Way - Room 400
Seattle, WA 98104-2637
(206) 296-6519

December 19, 1991

TO: Dave Clark, Manager, River and Water Resource Section

FM: Tom Bean, Senior Engineer, River Planning Program

RE: Berm along Mill Pond Road (Snoqualmie River Basin)

As you recall, last night the Snoqualmie Task Force expressed keen interest in the berm along the Mill Pond Road west of the City of Snoqualmie. In response to the Task Force request for help on this issue, I have spoken with Dick Ryon of the Weyerhaeuser Company. Mr. Ryon told me that the berm was constructed as part of routine maintenance activity on the log sort yard. Company officials therefore believe the activity to be exempt from King County permit authorities.

However, Mr. Ryon and I agreed that, if the berm is hydraulically important, it should be removed. Indeed, Mr. Ryon pointed out that his August 29, 1991, proposal for Snoqualmie-area flood hazard reduction included the same conclusion. In that proposal he stated, "If it can be shown that the berm has a negative influence on flood surging and storage, then Weyerhaeuser will work to reduce the effects."

Mr. Ryon requested that we share any information we might have which relates the berm to local flood hazards. To that aim, I have collected the following information.

- **Regulatory Floodway:** The upstream end of the berm crosses the regulatory floodway (Federal Emergency Management Agency 1989).

- **Surrounding Elevations:** Along the west side of the berm, the Mill Pond Road varies between 411 and 418 feet in elevation (King County Engineering Department 1961).

- **Water Surface Elevations:** At the upstream end of the berm, published Snoqualmie River water surface elevations are high enough to cross the Mill Pond Road at the berm locations. Regulatory water surface data is as follows (Federal Emergency Management Agency 1989):

Doc#7

King County
Surface Water Management Division
Department of Public Works
Yesler Building
400 Yesler Way - Room 400
Seattle, WA 98104-2637
(206) 296-6519

December 19, 1991

Mr. Dick Ryon
Land Use Manager
Weyerhaeuser Company
7001 - 396th Avenue SE
Snoqualmie, WA 98065

RE: Berm along Mill Pond Road (Snoqualmie River Basin)

Dear Mr. Ryon:

I am writing to transmit recent Surface Water Management (SWM) Division analysis of flood hazards in the Snoqualmie area. In particular, this analysis considers the potential flood hazard reduction benefits of modification of the berm in the Weyerhaeuser sort yard along the Mill Pond Road. The analysis concludes that berm modification could lessen local flood depths -- both on the Weyerhaeuser property and within the City of Snoqualmie.

In previous correspondence you have indicated willingness to modify this berm should such modification promise a reduction of local flood hazards. I believe that the attached analysis shows that berm modification can provide such a benefit.

Thank you for your continued commitment to flood hazard reduction. I look forward to hearing your reaction to this analysis, and I want to offer any additional information I might have that would help you to plan your actions on this site. If you have any questions or would like further information, please contact Tom Bean, River Planning Senior Engineer, at 296-8377.

Sincerely,

Dave Clark
Manager, River and Water Resource Section

DC:TB

cc: Jim Kramer, Manager, Surface Water Management Division
Debra Hendrickson, Manager, River Planning Program
Attn: Tom Bean, Senior Engineer

Doc #
9

King County
Surface Water Management Division
Department of Public Works
Yesler Building
400 Yesler Way · Room 400
Seattle, WA 98104-2637
(206) 296-6519

July 6, 1992

Mr. Dick Ryon
Land Use Manager
Weyerhaeuser Company
7001 - 396th Avenue SE
Snoqualmie, WA 98065

RE: Berm along Mill Pond Road (Snoqualmie River Basin)

Dear Mr. Ryon:

Attached are results of recent Surface Water Management (SWM) Division analysis of flood hazards in the Snoqualmie area. In particular, this analysis considers the potential flood hazard reduction benefits of modification of the berm in the Weyerhaeuser sort yard along the Mill Pond Road. The analysis concludes that berm modification could lessen local flood depths -- both on the Weyerhaeuser property and within the City of Snoqualmie.

The methods of this analysis were as follows. The HEC-2 model prepared by the Federal Emergency Management Agency as the basis for the 1989 Flood Insurance Rate Maps for King County and Incorporated Areas was used as a base. This model includes hydraulic descriptions of the area's topography and an estimated 100-year flow (80,000 cfs). The HEC-2 program's encroachment options were used to simulate total blockage of all flows east of the Mill Pond Road between the SR 202 and PSRHA bridges. Water surface elevations were then computed and plotted for the encroached and the unencroached (base) conditions.

The attached summary table and graphic information was developed in this process. These depict measurable water surface differences caused by the modeled encroachment. The maximum difference is roughly three inches (at the PSRHA bridge), and persists to a lesser degree throughout the upstream reaches of the HEC-2 model.

This simple analysis seems to indicate that moderate flood reduction benefits can be achieved through modification of the berm to increase local conveyance capacity.

I recognize that you may wish to supplement this simple analysis with additional detail. To that end I have

Doc. # 11

King County
Surface Water Management Division
Department of Public Works
Yesler Building
400 Yesler Way - Room 400
Seattle, WA 98104-2637
(206) 296-6519

July 7, 1992

TO: Dave Clark, Manager, River Planning Section

FM: Tom Bean, Senior Engineer, River Planning Section

RE: Mill Pond (Snoqualmie)

Yesterday afternoon I met with Dick Ryon and Kate Sullivan (both of the Weyerhaeuser Company) to discuss historic grading on the Snoqualmie mill site and the associated flood reduction opportunities. It was a very productive session.

We discussed how the berm along the Mill Pond Road obstructs flows as they return to the river from the Mill Pond area. This obstruction deepens the Mill Pond, making it less attractive to flows from upstream. The obstruction thus sends additional flows to the river channel and to the City of Snoqualmie.

Dick said that Weyerhaeuser wants to help to reduce local flood hazards. He asked whether mere removal of the berm might be the most effective flood reduction project, or if other action might be superior. We discussed the following FHRP project recommendations:

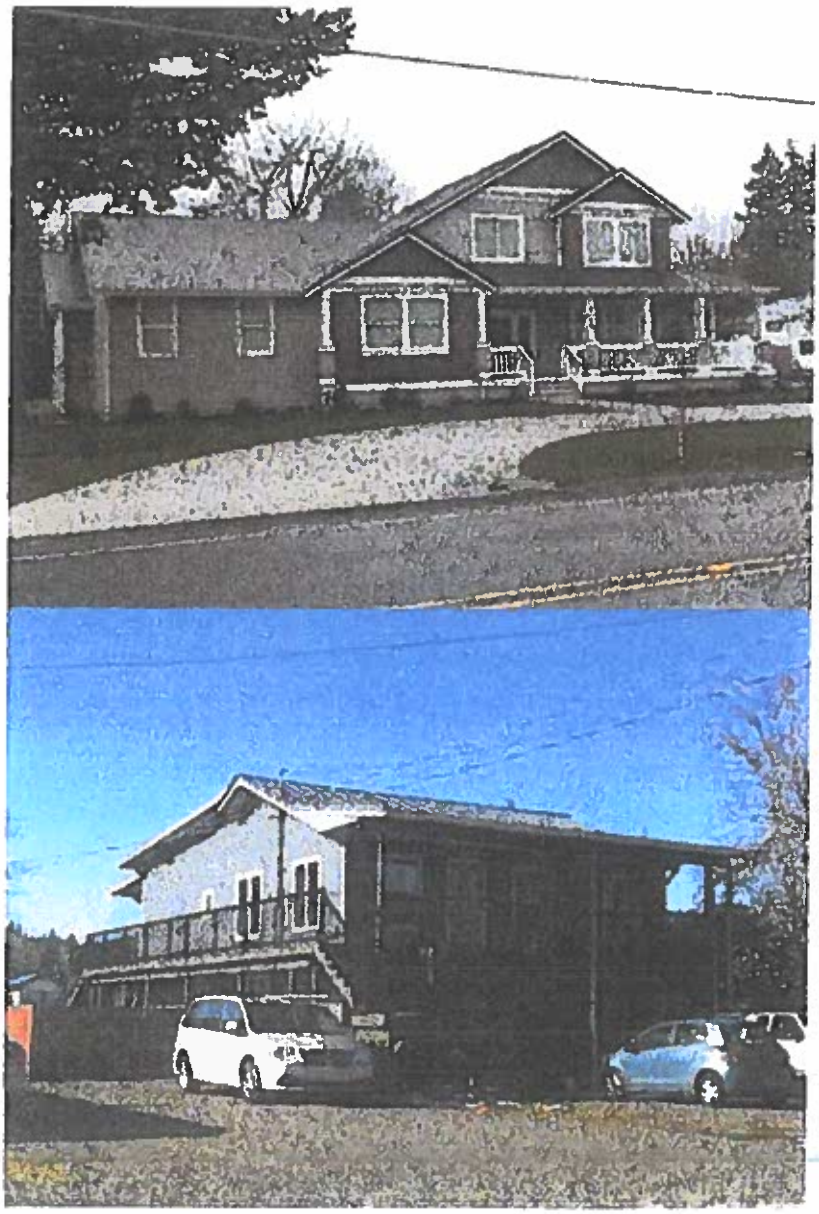
- Lower the Reinig Road and eliminate the adjacent levees. This would provide a better flow path from the river (above the Meadowbrook Bridge) to the Mill Pond.

- Improve the existing flood outlet from the Mill Pond by lowering the berm and possibly lowering the Mill Pond Road. This would provide a better flow path from the pond back to the river (below the PSRHA bridge).

Together, these projects could attract more flow to the mill site from upstream of the Meadowbrook Bridge. This would reduce flows in the main channel and on the left overbank (in the city). It would also provide additional flow capacity on a route parallel to the Corps' most extensive overbank excavation proposal. It may therefore extend the upstream effects of any flow improvements between the SR 202 bridge and the Falls, achieving the Corps' functional objectives without requiring the major environmental impacts and repetitive maintenance costs associated with overbank clearing and excavation.

A NOTE OF REFERENCE: **Home Elevation Requirements**

- There is a dangerous difference between the City and County codes for home elevation requirements.
- SMC 15.12.160: "…residential construction elevated to at least one foot above the base flood elevations"
- KCC 21A.06.490 : "…an elevation that is three feet above the base flood elevation".
- City example: 8588 384th Ave SE
- County example: 8615 384th Ave SE
- These 2 homes are 160 feet apart.



Letter No. 8

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Cynthia Krass <cynthia@svwid.com>
Sent: Friday, July 10, 2020 11:51 AM
To: Mark Hofman
Cc: Siri Erickson-Brown
Subject: Public Comment on the Snoqualmie Mill PCI DEIS
Attachments: Public comment letter Snoqualmie Mill Development June 25 2020.pdf

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Good day Mr. Hofman:

Please accept the attached comment from the Snoqualmie Valley Watershed Improvement District.

Please do not hesitate to contact me or Chairwoman Siri Erickson-Brown with any questions or comments.

Cynthia Krass
Executive Director
Snoqualmie Valley Watershed Improvement District

SNOQUALMIE VALLEY
Watershed Improvement District

June 25, 2020

Mr. Mark Hofman
Community Development Director/Responsible SEPA Official
38624 SE River Street
P.O. Box 987
Snoqualmie, WA 98065

Dear Mr. Hofman:

This letter is to provide public comment on the Snoqualmie Mill Draft Environmental Impact Statement for the proposed redevelopment of the Snoqualmie Mill Site. I am writing on behalf of the board of commissioners of the Snoqualmie Valley Watershed Improvement District (SVWID), an irrigation district formed in 2015 under RCW Chapter 87.03. The service area is generally floodplain of the lower Snoqualmie Valley, from Fall City to the King County line. The SVWID has statutory authority to address a wide range of water-related activities impact its members; the SVWID focuses maintaining agricultural drainage, including in response to flood events, and providing water supply for irrigation.

As downstream neighbors, the SVWID is very concerned about even the slightest change in the flow regime of the Snoqualmie River. When the lower Snoqualmie River breaches its banks during flood events, our members' farms become the drainage network for almost a half a million acres. Even the slightest increase can create challenges to agricultural production, especially considering flood season is starting earlier and ending later, according to USGS gage data. The increases we are concerned about are the reduction in impervious surface resulting directly from the development, as well as the permanent loss of the site as potential flood storage to attenuate peak flows. 8-1

As stewards of the basins' over-appropriated water supply on behalf of our members and the ecology o the Snoqualmie River, we are also concerned about any negative impacts to low flows in summer. Loss of impervious surface flood storage could result in reduction in groundwater infiltration, which could have negative impacts to streamflows in late summer in Snoqualmie River and Tokul Creek.

We request that the final EIS directly address the impact of the proposed project compared to historical conditions, not simply current conditions, as there is a long history of unpermitted fill on the site, which not only causes displacement, but also potentially cuts off access to additional flood storage. 8-2

Sincerely,

C Krass *(C. Krass for Siri Erickson-Brown)*

Siri Erickson-Brown

Chair, Board of Commissioners

dana.hubanks@gmail.com

Gov

Letter No. 9

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

Mark Hofman

From: Ostergaard, Elissa <Elissa.Ostergaard@kingcounty.gov>
Sent: Friday, July 10, 2020 10:46 PM
To: Shared Mill Site EIS
Cc: Mark Hofman; Cindy Spiry (cindy@snoqualmietribe.us); Henry Sladek, Councilmember; Zyla, Cory
Subject: Snoqualmie Watershed Forum's letter regarding the Snoqualmie Mill Pond DEIS
Attachments: Letter-SnoqualmieMillDEISComments-SnoquamieForum-Final.pdf

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear City of Snoqualmie,
Thank you for the opportunity to comment on the Snoqualmie Mill Pond DEIS. Please accept the attached letter from the Snoqualmie Watershed Forum.

Sincerely,

Elissa Ostergaard
Salmon Recovery Manager, Snoqualmie Watershed Forum
201 S. Jackson St., Suite 600 | Seattle, WA 98104
O 206.477.4792
C 206.637.4288
Elissa.ostergaard@kingcounty.gov
https://www.govlink.org/watersheds/7/

Protecting and restoring the health of the Snoqualmie Watershed in harmony with the cultural and community needs of the Valley.

SNOQUALMIE WATERSHED FORUM

Working together for salmon recovery and watershed health.

Carnation

Duvall

King County

North Bend

Skykomish

Snoqualmie

Snoqualmie Tribe

Tulalip Tribes



July 10, 2020

Mark Hofman
SEPA Responsible Official
City of Snoqualmie
38624 SE River Street
P.O. Box 987
Snoqualmie, WA 98065

Subject: Comments on the Snoqualmie Mill PCI Plan: Draft Environmental Impact Statement.

Dear Mr. Hofman:

We appreciate this opportunity to comment on the *Snoqualmie Mill PCI Plan Draft Environmental Impact Statement* (DEIS). We respectfully offer our comments from a collaborative and solutions-oriented perspective and value your efforts to address the concerns.

These comments are supported by a long-standing, multi-stakeholder partnership concerned with recovering and protecting the health of the Snoqualmie Watershed. For over 20 years, the Snoqualmie Watershed Forum (Forum) – a partnership between the Snoqualmie Tribe, the Tulalip Tribes, King County, the cities of Duvall, Carnation, North Bend, and Snoqualmie[1], and the Town of Skykomish - has worked closely with partners to develop consensus-based projects for Chinook, other salmonids, and water quality improvements across the Snoqualmie and South Fork Skykomish watersheds. We have a strong track-record of conservation success. Since 1998, we have allocated over $13.3 M in recovery actions across 270 projects, while leveraging more than $38 M from other funding sources. Our efforts are guided by best available science and comprehensive planning (see key plans, studies, reports), most notably the *2005 Snohomish River Basin Salmon Conservation Plan* (Salmon Plan) and the *2015 Snohomish Basin Protection Plan*. These comments are provided in this context.

We believe the approach currently outlined in the DEIS is deficient in a few areas and is likely to result in adverse impacts to salmonids and the overall health of the Snoqualmie Watershed, if implemented as written. Recovering and sustaining healthy watersheds requires holistic thinking: what happens upstream affects what happens downstream. Changes to the land and rivers above Snoqualmie Falls will ultimately be felt downstream, such as adverse impacts to downstream floodwaters, water quality, wood loadings, sediment loadings, and availability of invertebrates (aka fish food). These have implications for human health and safety as well as recovery of listed salmon and steelhead. We strongly encourage you to embrace this principle as you move forward with your review of the DEIS.

[1] While the City of Snoqualmie is a partner to the Forum, they do not have a position on this letter. The City of Snoqualmie noted they welcome any and all comments on the DEIS.

We want to highlight the importance of the Upper Snoqualmie Watershed for recreational fishing. All three forks of the Snoqualmie support significant, year-round sport fishing. Many of the comments we provide below regarding water quality and habitat are important to protect resident fish such as trout and the role they play in the culture, economy, and ecosystem of the Snoqualmie River's headwaters.

The Forum respectfully offers the following comments on the DEIS:

1. Impervious surfaces: investigate additional mitigation measures to reduce water temperatures.

> *Excerpt from the DEIS: "Potential water quality impacts from the treated stormwater within Planning Area 1 that will be discharged into the Snoqualmie River at this location would be predominately related to warmer temperatures of stormwater runoff from developed surfaces compared with river temperatures. However, given the relatively small volume of runoff compared with flow volumes in the river, changes in water temperatures within the river are not expected to adversely affect aquatic life. With respect to other water quality impacts, proposed on-site treatment will reduce stormwater pollutants to levels that are not expected to impact local conditions in the Snoqualmie River or fish habitat conditions therein."* (3-80)

The majority of the proposed impervious surface (e.g. parking areas, buildings, etc.) is located in Planning Area 1, on the northwest side of the project footprint, closest to the Snoqualmie River. Increased vehicular traffic to the site will increase due to both construction and commercial/industrial activities (e.g. office space, winery). Accordingly, a range of potential impacts from non-point pollution sources can be expected (e.g. adverse impacts to water temperature, sediment loadings, etc.; increased contaminants from vehicles traveling along SE Mill Pond Rd). 9-1

In spite of the heavily forested and relatively high elevation of the Upper Snoqualmie River Basin, summer water temperatures have been observed to exceed State standards every year in reaches on all three forks and the mainstem Snoqualmie River between the three forks confluence and Snoqualmie Falls. For instance, authors of the 2011 TMDL report for the Snoqualmie River Basin and 2015 summer study determined that the Snoqualmie River was consistently above the state standards for core summer habitat water temperatures (16°C) and spawning and incubation (13°C) (pg viii; pg 16). This is concerning as temperatures above 23°C can be lethal to salmonids, and temperatures were recorded as high as 25.1°C during this study. As such, any potential impact to water temperature is concerning, particularly as it relates to summer low flow periods. The DEIS could be improved by stating what the expected increase in water temperature is anticipated to be (i.e. a range in °C) and then put that in the context of other potential factors impacting water temperature in the Upper Snoqualmie River Basin (e.g. projected urban growth, forestry practices, climate change impacts, etc.).

Recommendation: We recommend estimating the anticipated summer increase in water temperatures in degrees Celsius and putting this in context of other factors such as climate change impacting water temperature in the Snoqualmie River. We also recommend mitigation actions to reduce water temperature impacts, such as through infiltration or well injection techniques that cool waters. 9-1

2. Impervious surfaces: revise amount of new impervious surface. Nearly all the existing impervious surfaces lie in Planning Areas 2 and 3 (See DEIS Appendix A – 1-3 to 1-6). Therefore, all proposed impervious surfaces in Planning Area 1 would be considered as "new impervious surface." A greater percentage of impervious surface should trigger more requirements and protections to offset those impacts concentrated in this area (phase 1) since a significant portion is being impacted by new impervious cover. Modeling native forest conditions is also typically required. 9-2

Recommendation: We recommend considering all proposed impervious surfaces in Planning Area 1 as 'new impervious surface' for the purposes of the EIS.

3. Riparian health: identify opportunities to expand and strengthen riparian areas along streams located within the project area.

The current buffer along the right bank of the Snoqualmie River is less than the 150-foot riparian buffer width recommended by the Salmon Plan for all fish bearing watercourses[2]. We recognize that Snoqualmie code does not require 150-foot buffers along streams and rivers, and that the project proponent has limited opportunities to improve the riparian area along the Snoqualmie River as those parcels are owned by other entities. Nonetheless, as noted above, the Snoqualmie River is 303(d) listed for temperature, and restoration of canopy trees and vegetation along tributaries to the Snoqualmie River – such as Stream 1 - would ultimately help to reduce solar effects to the river and improve microclimate. These water quality improvements would help both resident fish and benefit water quality conditions for downstream salmonids. All opportunities to re-meander Stream 1 would also be welcome mitigation for the proposed impacts. 9-3

While riparian function is diminished in the riparian area of SE Mill Pond Road, we understand the City of Snoqualmie's long-term goal is to remove this road and replace it with a community trail. With that goal in mind, we support the idea of setting back the portion of the road adjacent to Planning Area 1 and reconstructing it farther from the shoreline, with the existing roadbed decommissioned and restored to riparian vegetation.

Recommendation: We recommend the project include more actions that improve the

[2] A primary basin-wide recommendation of the Salmon Plan is to restore, enhance, and protect vegetated riparian areas, with mostly trees, at a width of 150 feet along salmon bearing streams and rivers to improve water quality and restore habitat for salmon.

health of streams, including re-meandering Stream 1 and expanding its riparian buffer (currently set at 75 ft). Restored riparian areas should be planted with species preferred by the Snoqualmie Indian Tribe. We also recommend that any treatment of invasive species (e.g. Scotch broom has been documented onsite) within this area be paired with plantings to prevent future infestations, wherever possible. 9-3

4. Critical areas and wetland permits and buffers

Excerpts from DEIS:

"The US Army Corp of Engineers (COE) issued a Jurisdictional Determination (JD) for wetlands and streams/ditches located on the Snoqualmie Mill site on May 3, 2017; it is valid for a period of 5 years." (3-59)

"Wetlands and streams are protected by Section 404 of the Federal Clean Water Act and other state and local policies and ordinances including Snoqualmie critical area regulations (SMC 19.12).... The City's code limits alterations to wetlands, streams, and their buffers, subject to specific exceptions." (3-106) 9-4

On April 21, 2020, the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency issued a rule changing the definition of "waters of the United States" (WOTUS). The rule redefines which waters are subject to federal water quality protections under Section 404 of the Clean Water Act, excluding many wetlands, streams that flow in response to rainfall, and other water bodies. The rule is in effect as of June 22, 2020.

Recommendation: We recommend clarifying if and how the 2020 WOTUS rule is likely to affect the protection of wetlands and streams on the project site and get confirmation from WA Department of Ecology whether any state permits are required given the recently created regulatory gap.

Excerpts from DEIS:

"Impacts to Buffers: Wetland buffers help to protect wetlands from indirect effects from developed areas and other types of human-caused disturbance. A variety of wetland functions are protected by vegetated buffers in the following ways: (1) removing excess sediment, toxics, and nutrients; (2) influencing microclimate; (3) maintaining adjacent habitat critical for life needs of many species dependent on wetlands; (4) screening adjacent disturbances; and (5) maintaining habitat connectivity. Retaining degraded buffers, or narrowing the width of buffers, reduces buffer functions and may not protect the critical area from the indirect effects of development." (3-107) 9-5

"Wetland 12: The majority of the wetland buffer provided to Wetland 12 would be reduced in width on average by approximately 36%. In the location of maximum reduction, the provided buffer width would be 16.4 feet and would separate the wetland from a stormwater wetland

facility located east of Lot 4 in the northeast portion of Planning Area 1. Compensatory buffer for proposed buffer loss would be provided as a large block of habitat contiguous to the southern portion of Wetland 12 to provide a habitat linkage with Wetland 28 and to link large habitat areas associated to Borst Lake and the Snoqualmie River. The proposed habitat linkage would not be provided if the standard 165-foot wetland buffer width was utilized." (3-108)

While it is beneficial to have large buffers connecting wetlands, buffer width should not be reduced to a width that jeopardizes critical wetland functions such as ability to remove excess sediment, toxics, and nutrients. Using wetlands for water quality treatment, as stated elsewhere in the application, will be in jeopardy if the functionality of wetlands themselves are significantly degraded. Using wetlands for water treatment – especially where waters are received from imperious surfaces - can impact wetland hydrology, plant diversity and ultimately compromise wetland quality. For the location of maximum reduction, 16.4 feet is less than 10% of the 'standard buffer' noted in the DEIS (165 feet). Consideration should be given to alternatives that protect larger buffer widths. 9-5

Recommendation: Buffer widths should be maximized to protect wetland function around and near critical areas.

5. Groundwater Quality

Excerpt from DEIS: "As shown in Chapter 2 – Snoqualmie Mill PCI Area Summary by Use, a breakdown of the proposed land use of the revised PCI Plan for this EIS the total anticipated impervious area for Planning Area 1 totals approximately 33.1 Ac. This is below the 50 Ac. threshold for a Large Site Drainage Review. It is not anticipated that Planning Areas 2 and 3 will develop significantly outside of the existing impervious footprint of the site, but this is not known at this time. This is additionally the rationale for considering this a Large Site Drainage Review. The EIS will also demonstrate that the total project site, albeit much greater than 50 Ac., does not lie within the recharge area of a sole source aquifer or an area designated as highly susceptible to groundwater contamination." (Appendix A – 1-3) 9-6

A review of CARA coverage in King County's iMap suggests that critical aquifer recharge areas (category 1) extends to this site within the city limits. Being within that area requires high levels of protective measures. The significant expansion of impervious areas in Planning Area 1 holds high potential to impact the quality of groundwater recharge.

Recommendation: We recommend the project proponent clarify how they will avoid impacts to critical aquifer recharge areas.

6. Water supply considerations 9-7

Our understanding is that there is sufficient water supply to accommodate Phase 1 of the

project. Developing the project beyond Phase 1 would likely require additional water rights, with potentially adverse impacts for local residents and ecosystems. We are particularly concerned about potential impacts to summer low-flow periods resulting from the increased water use by the project.

While the Mill Pond Phase 1 may be able to be supported with future plans for water supply, there would be uncertainty, particularly with increased demand for wine production on an annual basis. Climate change will drive further uncertainty in terms of rainfall and subsequent instream flows, which may drive more restrictive water conservation measures in the future and ultimately put the development and levels of service in the City of Snoqualmie at risk. Accordingly, Phases 2 and 3 should not be part of the consideration for this planned development, nor should these two areas be included in the Phase 1 impacts until full plans and mitigation for water supply are in place. 9-7

Recommendation: We recommend the project be rescaled to align with the level of certainty on future water availability unless water rights situation and hydraulic connectively can be assessed in a way that provides assurances. In addition, water use impacts to instream flows during summer months, water temperatures, and aquatic habitat should be considered as part of this shared watershed.

7. Channel Migration Zone: development in floodplain areas should be minimized.
Excerpts from the DEIS:

> *"A portion of the site along the southwestern edges of Planning Area 1 and within Planning Area 3 lies within a designated Moderate Channel Migration Hazard Area. No substantial development is planned in the hazard area in Planning Area 1, but the proposed relocation of a portion of Mill Pond Road, and drainage discharge improvements in Planning Area 3, would fall within the Moderate Channel Migration Hazard Area."* (1-10)
>
> *"A section along the southwestern edges of Planning Area 1 and Planning Area 3 are within the Moderate Hazard Area, but most of Planning Area 1 and the western portion of Planning Area 3 are within mapped Potential Hazard Area."* (3-16)

9-8

Building within the Channel Migration Hazard Area is likely to increase both environmental and financial risks. While the currently heavily reinforced shoreline prevents migration, adding further infrastructure to this area would preclude future opportunities to restore natural river function, which is central to recovering salmonid species listed under the Endangered Species Act (ESA).

Floodplains also hold flood waters during floods, and anything that fills a floodplain makes flood waters arrive earlier and at higher elevations for people who live downstream (e.g. below Snoqualmie Falls, lower in Snoqualmie Valley). We were unable to identify any analysis of potential flood rise impacts caused by this development on downstream areas.

Also regarding fill, the City of Snoqualmie's Comprehensive Plan documented areas of prior unpermitted fill at the Mill Site, and states that removal of this fill will be required before development (See Comp Plan at 7-13, "Land Use"). Neither the Plan nor the DEIS appear to specify how the development will comply with this directive and we recommend adding that clarification.

This new development may also create a potential future cost-burden for county taxpayers (e.g. via the King County Flood Control District, which actively improves or maintains flood facilities), City, or project proponent (e.g. relocating facilities due to recurring flooding). Clearing and grading in this area during construction could result in higher runoff volumes, resulting in increased erosion and sediment transport, adversely impacting aquatic habitat. There is a long-term potential for erosion and destabilization of landslide hazard and slope areas. 9-8

Recommendation: We recommend the project proponent minimizes infrastructure within the Channel Migration Hazard Area. We also recommend that an analysis of potential base flood elevation both downstream and upstream resulting from the project be completed and presented in the EIS. Finally, we recommend clarification be provided regarding how unpermitted fill will be handled prior to the development.

8. Bull trout: more data is needed to support the conclusion that bull trout are not found within the project vicinity.

> *Excerpt from the DEIS: "Bull trout critical habitat was designated by the USFWS on September 26, 2005. Under the ESA listing, the USFWS assumes that bull trout are present in suitable habitat in King County waters unless proven otherwise. However, extensive instream surveys for bull trout have failed to detect its presence anywhere in the three forks of the Snoqualmie River above the falls (Berge and Mavros 2001). Therefore, the consultant concludes that critical habitat for bull trout is not found within the project vicinity."* (3-101)

9-9

Bull trout are presumed to be in the Upper Snoqualmie in part due to their presence in adjacent watersheds (i.e. Upper Skykomish and Upper Cedar River Watershed) and below Snoqualmie Falls (i.e. bull trout spawning and rearing habitat).

The assumption that there is no critical habitat for bull trout is likely based on the following conclusion from the study referenced in the DEIS (*Berge and Mavros 2001*):

> *"Although native char are found in adjacent watersheds and below Snoqualmie Falls, it appears that a remnant population does not exist upstream of the falls. This finding suggests that projects occurring upstream of Snoqualmie Falls do not need to consider bull trout presence in permitting requirements."*

However, they also mention:

> *"King County is required to permit for these projects under the assumption that bull trout are*

present "erring on the side of the species" as directed in the ESA."

It also worth noting that a separate study - Thompson *et al.* 2011 (Snoqualmie River Game Fish Enhancement Plan) did not observe any bull trout in the Upper Snoqualmie during their snorkel surveys.

While these two studies were not able to document bull trout during their surveys, this is not sufficient evidence to conclusively say that bull trout are not present. Finding a relatively rare fish species such as bull trout is very difficult. The effectiveness of traditional survey techniques such as snorkeling and electrofishing is known to be low because bull trout are remote, cryptic, and often exist in very low densities. Furthermore, King County did not have the benefit of the US Forest Service (USFS) Climate Shield model at the time these studies were completed. For this reason, the Forum recommended investment in eDNA bull trout sampling for the Upper Snoqualmie during the 2020 Cooperative Watershed Management grant round (project sponsor: Wild Fish Conservancy; project duration: 10/1/2020 to 12/31/2023). This study leverages new sampling methodologies (i.e. eDNA) and should provide the level of rigor needed to make more definitive conclusions about the likely presence or absence of bull trout. Despite the lack of bull trout observations in two studies, until further studies are completed project proponents should err on the side of caution and assume that ESA listed fish may be present. 9-9

Recommendation: We recommend that all areas of suitable habitat in the Snoqualmie River that could be impacted by the project (i.e. immediate vicinity and downstream) be considered bull trout habitat under the ESA, unless proven otherwise. The significance of project actions that might jeopardize the quality and/or quantity of bull trout habitat should be revisited. Consideration to potential impacts to bull trout should also be included in future evaluations (e.g. the Biological Evaluation that will be submitted as part of the floodplain development permit application).

9. **Alternatives Analysis: more detail would improve the DEIS.**

Two alternatives to the Proposed PCI Plan were developed based on SEPA requirements and the applicant's stated project objectives: No Action, and an alternative redevelopment scenario. 9-10

Recommendation: the inclusion of reasonable alternatives is a key component of any EIS. We recommend adding more detail to the two provided alternatives to help reviewers better understand the merits of the alternatives and to bolster the overall credibility of the environmental analysis.

Addressing these concerns will help the Forum to achieve our goals for salmon recovery and watershed health. Since 1998, the City of Snoqualmie has supported the Forum's goals and played a key role in efforts to restore our watershed. We look forward to continuing our partnership and all opportunities to enhance the City's impact on salmon recovery. Thank you for

considering these comments.

If you would like to discuss this letter further, please contact Elissa Ostergaard, Snoqualmie Salmon Recovery Manager, at (206) 477-4792 or elissa.ostergaard@kingcounty.gov.

Sincerely,

Cindy Spiry, Forum Chair
Snoqualmie Tribe ENR

Henry Sladek, Forum Vice-Chair
Town of Skykomish Mayor

cc: Snoqualmie Watershed Forum
Elissa Ostergaard, Snoqualmie Salmon Recovery Manager

Letter No. 10

Mark Hofman

From: Snoqualmie Action <snoqualmieaction@gmail.com>
Sent: Monday, July 06, 2020 10:09 AM
To: Mark Hofman
Subject: request for extension for public comment

Categories: Green category

RECEIVED
JUL - 6 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I write this letter to you in my role as President of the Snoqualmie Community Action Network (SCAN), a registered 501(c)(3) non-profit in the State of Washington. As a group, we advocate for a safe, healthy, and sustainable future for the Snoqualmie Mill site.

SCAN respectfully requests an additional extension of the deadline for public and agency review of the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan Draft Environmental Impact Statement (DEIS). The DEIS for this significant project deserves careful review and comment, which requires much more time than is normally needed. We present these reasons that an additional extension is justified:

1.
2. **The COVID-19 pandemic state**
3. **of emergency**
4.

10-1

Due to the current COVID-19 state of emergency declared by the Governor, many important resources are either closed or operating at limited capacity. This includes state agencies such as the Ecology, Health, and Transportation departments, public libraries, and the Snoqualmie Valley Historical Museum. For example, when we requested information from the Department of Ecology, they told us that not all of the relevant records were available to their remote workers. Some records only existed in paper form in their offices, which they cannot access until it is safe to return to their offices.

The COVID-19 emergency proclamations have prevented members of the public from gathering to plan and organize group efforts to review the massive DEIS. Electronic communication methods are being used, but are not as effective as in-person meetings.

2.
3. **The city's choice to restrict**
4. **public records request processing**
5.

In 2019 the Snoqualmie City Council established a limit on how much time city staff is allowed to use for answering public records requests (PRRs). At that time, members of the public, the Washington Coalition for Open Government, and at least one City Council member argued that the limit was far too low and would seriously constrain situations when members of the public have a valid need for large or complex records requests.

SCAN is aware of several PRRs currently in the city's pipeline regarding the DEIS. The city has notified each requestor of an estimated date for just a first installment that is near, or in most cases beyond, the DEIS comment deadline. It is unstated when complete responses will be received. This situation prevents access to these public records during the DEIS comment period.

These three public records requests have been reported to us. There may be others that we are not aware of. Each statement in quotes is copied from the city's initial response letter to the requestor.

- PRAR 20-044 (Richard Scheel): "We estimate that the first installment can be produced by ***July 8, 2020.***"
- PRAR 20-045 (Julie Lake): "We estimate that the first installment can be produced by ***July 14, 2020.***"
- PRAR 20-050 (Cristie Coffing): "We estimate that the first installment can be produced by ***July 23, 2020.***"

10-2

3.
4. **The size and complexity of**
5. **the DEIS**
6.

The DEIS is huge, at 2,921 pages, and requires a significantly longer review period than is normal.

Snoqualmie's Municipal Code specifies that a DEIS must be written within 180 days. The Snoqualmie Mill DEIS actually took the city and the proponent approximately 3 years to complete. Clearly, if the issues involved in the DEIS are so large and complex that it took six times as long to create as allowed in the Municipal Code, then the time for public review and comment should be significantly longer than the amount ordinarily specified by state law.

10-3

Section 19.04.080(C) of the Snoqualmie Municipal Code states "Environmental impact statements shall be completed within a period to be set by the responsible official not to exceed 180 days, unless the city and the proponent of the action agree in writing to a longer time." Mark Hofman, the SEPA Responsible Official for the City of Snoqualmie, stated to Richard Scheel in an email dated May 13 2020 "The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant-City agreement to an additional time extension." The Draft EIS for this project has taken approximately three years to create, six times as long as the 180 days mandated by the Municipal Code. 10-3

4.
5. **The need for review by certified**
6. **experts**
7.

We are aware of the priority placed by the courts on testimony by certified experts compared to that of ordinary citizens when considering land use cases. This might not be an important factor for simple projects, but this project involves unusually technical environmental issues (including, but not limited to, past contamination of the site).

The proponent had the financial resources to retain many such experts when preparing the DEIS, and they were permitted the time for those experts to perform complex analysis. In order to prepare DEIS responses that can hold up in court, members of the public also need to retain experts. However, members of the public do not have money at the ready for such experts; fund raising is necessary. Since there was no advance information about when the DEIS review period would begin, we were no able to begin raising funds until the sudden announcement of the publication of the DEIS. Once funds are raised, it then takes time for these experts to perform their analysis of the DEIS. 10-4

Based on the above reasons, SCAN respectfully requests that the deadline for reviewing and commenting on the DEIS be extended to 15 days past the final delivery date of records responding to the three PRRs listed above.

Sincerely,
Dana Hubanks
President & Co-Founder Snoqualmie Community Action Network

Letter No. 11

Mark Hofman

ECEIVED
JUL - 9 2020
City of Snoqualmi

From: cristie coffing <imoutto unch@hotmail.com>
Sent: Thursday, July 09, 2020 9:04 PM
To: Mark Hofman
Subject: DEIS Comments for July 10th Deadline
Attachments: Comments of DEIS Cris ie Coffing docx· JACL jpeg· JACL 2.jpeg; . ; DN Traffic Consultants report-1.pdf; Fodor_2000 costs of_growth_in_washington(1).pdf

Categories: Green category

CAUTION: Th's email originated from outside the C ty of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

To: Mark Hofman
From: Cristie Coffing

Please find attached my comments on the DEIS, 3 pages of scanned document Emergency Resolution by the Japanese American Citizens League, DN Traffic Consultant reprt & Fodor Cost of Growth.

Thank you,
Cristie Coffing

To: Mark Hofman & All Concerned Parties

From: Cristie Coffing

Please find my comments regarding the DEIS report for the Snoqualmie Mill Project. I represent Snoqualmie Community Action Network, a 501C3, am a member of the Sierra Club, a founder of The Black Dog Arts Coalition, a 501C3, an owner of the Black Dog Arts Cafe in downtown Snoqualmie, a sub-contractor with Si View Metropolitan Park District, instrumental in the formation of the Inter-Local agreement with King County Historical Preservation & Landmarks Commission, previous owner of the Woodman Lodge and responsible for it's landmark status, instrumental in preservation and Landmark statys of the Entwistle house in Carnation Washington and the Downtown Historic District in the City of Snoqualmie. I have resided in the City of Snoqualmie since 1998.

First, I would like to state for the record; the three-minute limitation presented at the online public comment meeting violated SEPA rules. Also it is in Snoqualmie's city code that a DEIS be published within 180 days after a development is proposed, it has been over three years, so your own municipal code has been violated. 11-1

Comments regarding Historical/Cultural Resources section of the DEIS:

On July 7th an emergency resolution was drafted by The Japanese American Citizen's League of Washington DC relating to the preservation of the Snoqualmie Falls Lumber Company site where Japanese workers harvested and milled timber and helped build forest rail lines from 1917 until 1942 until their internment. This proposal was not submitted in a timely matter, because **they did not receive the May 3rd, 2017 filing notice of application and scoping for planned industrial development within the boundaries of a historically** 11-2

significant site until May 23, 2017. This was an inadequate process of notification, as they obtained information of the development through a citizen of Snoqualmie. The JACL is not mentioned in the DEIS nor the appendix of the cultural resources section.

In the body of the DEIS Mentioned is Karen Yoshitomi, Japanese Cultural and Community Center of Washington, but not the JACL was not mentioned, and in their resolution, they request: (full body of resolution document is attached)

NOW, THEREFORE, BE IT RESOLVED by the National Council of the Japanese American Citizens League that JACL acknowledges the potential significance of the Snoqualmie Falls Lumber Company site as it relates to the Japanese workers in forestry, railway history, and the history of Japanese incarceration; and

BE IT FURTHER RESOLVED that JACL supports further inquiry and consideration by the City of Snoqualmie Community Development Department as to portions of the site that should remain undeveloped and maintained for open space; and

BE IT FURTHER RESOLVED that JACL supports consideration and acknowledgement that the former mill site and surrounding area is a significant archeological site; and

BE IT FURTHER RESOLVED that JACL supports public education and interpretation of the site as it relates to the history and contributions of the Japanese to the lumber and railroad industries in the Pacific Northwest region and requests further archeological research in this regard should the development plans go forward; and

BE IT FURTHER RESOLVED that JACL fully supports efforts to place the SFLCo mill site on the National Register of Historic Places; and

BE IT FURTHER RESOLVED that JACL demands assurance that all Washington State and Federal regulations regarding culturally significant and historic areas have been reviewed and properly complied with in relation to the SFLCo mill site.

11-3

Professional archaeologist Teresa Trost and SMV representative Tom Sroufe met on site with Karen Yoshitomi and James Szubski, concerned citizen and local author, on September 22, 2017. The plan for surveying to find archaeology associated with the Japanese community was discussed. **On October 9th and 10th 2017 an archaeological field study was conducted without the presence of the concerned parties of the JACL or the CCCW. Present parties were:** Snoqualmie Nation archaeological monitors Aaron Webster and Stephen Wymer were on site portions of each day of the

archaeological field survey October 9 and 10, 2017. (2.0 consultation appendix cultural resources section)

Consideration: A representative of the Japanese American Citizen's League should have been onsite for the archaeological survey as objects were found.

11-3

A series of trenches were dug. In Trench 5 at the top of Stratum IV as of page 53 of the appendix for cultural resources, artifacts were found, and the exploratory dig was halted. ---- objects brought to the surface were glass and leather fragments, two glass vessels with embossed Japanese script, fragments from five Japanese style teacups, leather pieces from men's boots and shoes, two leather soles from women's shoes, a fragment of a child's leather shoe, a light bulb, three amber (beer?) bottles, a metal bowl, pharmaceutical bottles, and fragments of china dinnerware. The earliest date of manufacture identified was 1900 and the youngest terminal date of manufacture was 1959. The median date appears to be ca. 1930. The number of shoe fragments present could be indicative of deposition when community residents were interned. Shoes may have been too bulky to carry, given that luggage space was limited. Additionally, a German manufactured doll may have been abandoned because of its association with World War II adversaries.

11-4

On page 55 of the appendix for cultural resources it is stated: Site 45-KI-1474 (Trench 5's location) appears to meet the eligibility requirements for listing in a heritage register under Criterion D.

Consideration: When and how will this listing be done? This is not addressed in the DEIS.

Pg 87 of the appendix: the archaeological sites are spatially separate from the industrial mill complex both as it was during the Mill's period of significance and as it is today. For these reasons, it is recommended the cultural resources 45-KI-1473, 45-KI-1474, and proposed historic district, be managed as distinct and separate cultural resources. There is no management of the cultural resource requested by the JACL in the DEIS.

11-5

Consideration: How will the developer manage these cultural resources? This needs to be addressed in the DEIS before the approval of the pr ect.

On page 94 of the appendix it states: No further cultural resource investigations are recommended prior to the development of Planning Area 1. Plans are that ground disturbance in the area mapped as the Japanese Community (Figure 11) will extend no more 1.8 m (6 ft.) below the surface grade elevation (as it was at the time of the survey, approximately 424 ft. asl). This provides a 0.76-m (2.5-ft.) buffer overlying the depth at which 45-KI-1474 was found. This buffer suffices if there is any undiscovered archaeology because the three probes in the area (EP01014, TP5, and TP6) had fill to depths of 7.2-10 ft. below surface. If, in the future, a different project is planned to occur near 45-KI-1474, and subsurface disturbance will extend 6 ft. below the grade as it was on at the time of this survey the DAHP must be consulted regarding potential effects. Archaeological resources in ashington are protected under the Revised Code of Washington (RCW) 27.

11-5

Pg 45 of the appendix Figure 16. Archaeological and geotechnical surveys map, shows numbered trenches, nowhere does it show the location of trench 5.

Conside a ion: Where exactly is trench 5? You as a council and administration should know the exact location before proceeding and eliminating the opportunity for proper preservation and recognition.

The map on page 5 of C of the appendix has the location of the trenches blacked out. In summation it appears that trench 5 will not be managed or preserved or archeologically excavated; it appears it will be a parking area, and therefore covered by pavement.

This does not meet your own criteria for cultural and historical preservation; it is a sellout and dishonors the Japanese American Citizens League.

11-6

The artifacts found were put between two pieces of landscape cloth and reburied 8 ft. below grade.

In Summation: The DEIS does not address the JACL emergency resolution put forth you July 7th 2017 and no activity should be considered until the JACL and the Japanese Cultural and Community Center of Washington are consulted as to how to proceed.

11-7

A full archeological survey should be performed with JACL representatives present. A portion of the site should be held and preserved in memoriam, honoring the contribution of the Japanese to the Snoqualmie Mill Timber history. This memorial should be designed with input and consensus of the Japanese American Citizen's League, The Japanese Cultural and Community Center of Washington and the developer.

Neither the Japanese American Citizen's League, nor Karen Yoshitomi of The Japanese Cultural and Community Center of Washington were listed as interested or affected parties to be notified of the DEIS even though the developer had been served the emergency resolution and had consulted with Karen Yoshitomi of the Japanese Community center of Washingotn. This is a gross oversight, disallowing their voice and comment on the body of DEIS. This should qualify as a cease and desist of the current comment period. A new commenting period should be issued, allowing the JACL and the JCCCW adequate and equal time to review and comment.

11-7

*Please find attached the full body of the JACL Emergency Resolution.

Comments Regarding Light Pollution:

On pg. 55 of the cultural resources appendix it states: The PCI Complex may locally lighten the night sky. However, a subjective assessment is that only extremely bright light would travel far enough to cause any glare on mist or the waters at Snoqualmie Falls. Discussions with SMV indicate such lighting will not be used in the PCI Complex.

Consideration: This will be a concert venue and an industrial area. Can you please tell me how a concert venue avoids bright lights?

I reiterate to you the findings in my scoping document submitted in 2017 regarding light pollution, artificial light increases the risk of cancer, especially breast and prostate cancers increases the risk of

11-8

disease, especially diabetes. It inhibits a bird's ability to hunt and navigate, adversely affects insects and therefore, the food web of predators, bright night-light produces a radical alteration on the habits of nocturnal animals and amphibians. Light pollution exacerbates air pollution, as night light drastically slows nightly cleansing, which is in effect nitrate radicals that break down polluting chemicals in the air that form smog and ozone. 11-8

Consideration: The findings in my scoping document have not been adequately addressed in the DEIS document. The topic of light pollution is not adequately studied nor discussed in the body of the DEIS and therefore needs to be revisited, especially with climate change and the increasing need for nightly cleansing of free radicals.

Comments Regarding Traffic Implications:

Please find attached Traffic Study by DN Traffic Consultants 11-9

Consideration: The current DEIS should be denied as traffic studies do not relate the full impact of this development. Impending traffic effects endanger the citizens of the City of Snoqualmie and the surrounding Snoqualmie Valley.

Further Comments:

Consideration: The DEIS does not adequately demonstrate where the water will be obtained for all phases on development, this should be addressed before approval of the DEIS. 11-10

Consideration: Nowhere in the body of the DEIS document is climate change addressed. 11-11

Consideration: With the COVID aftermath and loss of retail momentum, restrictions on large gatherings, stay at home work practices becoming the normal and general decrease in 11-12

consumer consumption, this project needs to be revised to reflect these projected long term changes.

11-12

I hope you deliberate fully on the DEIS and reject this document in it's present form. I hope you realize that growth does not pay for itself. Growth costs a community, not only economically, but also in many, many different ways. I have attached a study on the cost of growth as well.

11-13

Supporting Attachments include: 3 scanned pages of Japanese Emergency Resolution; DN Traffic Consultants Report; Fodor Cost of Growth

Thank you for your time and consideration,

Cristie Coffing

PO Box 24

Snoqualmie, Wa. 98065

imouttolunch@hotmail.com

JAPANESE AMERICAN CITIZENS LEAGUE
48th JACL National Convention
National Council Meeting
Washington DC
July 7, 2017

EMERGENCY RESOLUTION

This proposal could not have been submitted by the regular deadline because JACL members did not learn of the May 3, 2017 filing of a notice of application and scoping for planned industrial development within the boundaries of a historically significant site until May 23, 2017.

A RESOLUTION OF THE NATIONAL COUNCIL OF THE JAPANESE AMERICAN CITIZENS LEAGUE RELATING TO THE PRESERVATION OF THE SNOQUALMIE FALLS LUMBER COMPANY (SFLCo) SITE, WHERE JAPANESE WORKERS HARVESTED AND MILLED TIMBER AND HELPED BUILD FOREST RAIL LINES FROM 1917 UNTIL 1942

WHEREAS, in 1917, several hundred young men were recruited from Japan to harvest and mill timber for the Snoqualmie Falls Lumber Company which was located at the foothills of the Cascade Mountains in Western Washington; and

WHEREAS, the Japanese immigrants worked alongside the United States Army's Spruce Division stationed at Snoqualmie to harvest timber deemed essential to the war (World War I) effort; and

WHEREAS, the Japanese workers also helped to build and maintain the nearly 100 miles of rail lines of the SFLCo; and

WHEREAS, from 1917, the Japanese worked continuously for the lumber company and made up more than half of the workforce for 25 years; and

WHEREAS, the Snoqualmie mill was the first in the industry to implement replanting of forests and sustainable yields, which was likely influenced by the practice developed in Japan 200 years before; and

WHEREAS, the Japanese and their American-born children lived in segregated bunkhouses; and

WHEREAS, documents in the company's archives (now Weyerhaeuser) show that mill managers lobbied the government against the forced removal of their Japanese workers; and

WHEREAS, in May 1942, the workers and families were forced to leave under Executive Order 9066 and reportedly dumped everything related to Japan into outhouse pits because they could only bring what they could carry; and

WHEREAS, the bunkhouses were burned to the ground the day after the Japanese were forced to leave; and

WHEREAS, in 2005, the SFLCo Power Plant was listed by the Washington Trust for Historic Preservation as an Endangered Site; and

WHEREAS, the SFLCo Power Plant was designated in 2005 as a King County Landmark under the Historic Preservation Program of the Department of Natural Resources; and

WHEREAS, the land where the bunkhouses were situated has not been developed for 75 years; and

WHEREAS, on May 3, 2017, an application was submitted to the City of Snoqualmie to approve a Planned Commercial Industrial Plan and Development Agreement for the former SFLCo site; and

WHEREAS, the City of Snoqualmie has identified a list of key issues and elements of the environment that must be examined, including, but not limited to historic and cultural resources; and

WHEREAS, the grave sites of Japanese workers may exist on the property; and

WHEREAS, efforts to preserve the site by local community members, historians, preservationists and the Snoqualmie Tribe are currently underway.

NOW, THEREFORE, BE IT RESOLVED by the National Council of the Japanese American Citizens League that JACL acknowledges the potential significance of the Snoqualmie Falls Lumber Company site as it relates to the Japanese workers in forestry, railway history, and the history of Japanese incarceration; and

BE IT FURTHER RESOLVED that JACL supports further inquiry and consideration by the City of Snoqualmie Community Development Department as to portions of the site that should remain undeveloped and maintained for open space; and

BE IT FURTHER RESOLVED that JACL supports consideration and acknowledgement that the former mill site and surrounding area is a significant archeological site; and

BE IT FURTHER RESOLVED that JACL supports public education and interpretation of the site as it relates to the history and contributions of the Japanese to the lumber and railroad industries in the Pacific Northwest region and requests further archeological research in this regard should the development plans go forward; and

BE IT FURTHER RESOLVED that JACL fully supports efforts to place the SFLCo mill site on the National Register of Historic Places; and

BE IT FURTHER RESOLVED that JACL demands assurance that all Washington State and Federal regulations regarding culturally significant and historic areas have been reviewed and properly complied with in relation to the SFLCo mill site.

AND FINALLY, BE IT RESOLVED that JACL staff transmit a copy of this resolution to the members of the Shoqualmie City Council, City of Shoqualmie Community Development Department, Washington Trust for Historic Preservation, King County Department of Natural Resources Historic Preservation Program, and the Japanese Cultural & Community Center of Washington.

Sponsored by: Puyallup Valley Chapter (JACL entity) Dated: June 26, 2017 (Month/Day/Year)

Approved by: Eileen Yamada Lamphere, Chapter President
Name and Title (Please Print)

Signed: /s/

Fiscal Impact Statement attached

Name: Sharon Uyeda
(Please Print)

District: NCWNP Chapter: San Jose

Signed: /s/

Name: David Kawamoto
(Please Print)

District: PSW Chapter: San Diego

Signed: /s/

Name: Dale Ikeda
(Please Print)

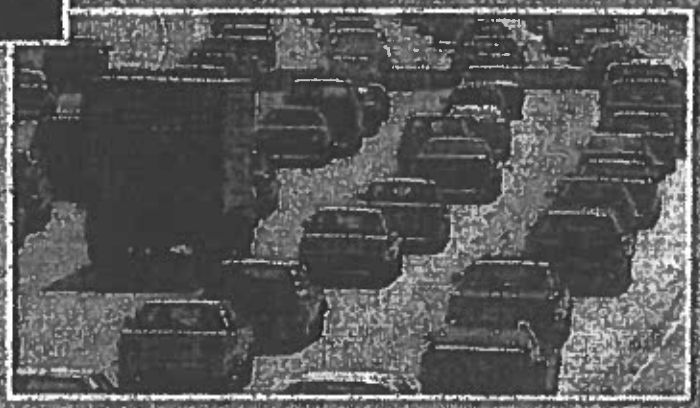
District: CCDC Chapter: Clovis

Signed: /s/

The Columbia Public Interest Policy Institute

The Cost of Growth in Washington State





By Eben Fodor
Research Assistance
by Erik Knoder

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The Cost of Growth in Washington State

October 2000

Prepared For
Columbia Public Interest Policy Institute
Bellevue, Washington

By Eben Fodor
Research assistance by Erik Knoder
FODOR & ASSOCIATES
Community Planning Consulting
Eugene, Oregon

This report is a project of the Columbia Public Interest Policy Institute. Funding for the project was provided in part by a King County Special Programs Grant through the offices of Metropolitan King County Councilmember Brian Derdowski. The Columbia Public Interest Policy Institute would like to thank Mr. Derdowski for his long standing commitment to unveiling the real cost of growth in King County. For his support in helping to ensure that this project came to fruition, the Institute would also like to acknowledge the support of the King County Executive, Ron Sims. Suzanne Simmons, King County Department of Community and Human Services, has provided ongoing support for the Institute's many projects. Reviewers of this report, Bill Elder, Executive Director of Alternatives to Growth Washington, Cy Hersch, attorney-at-law, and Sue Adams, Smart Growth Coordinator for Pilchuck Audubon Society, provided many helpful comments.

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INTRODUCTION

The purpose of this study is to foster a greater understanding and awareness of complex growth and fiscal issues by citizens and public officials. A great deal of debate has taken place regarding which costs can be attributed to growth, and what impacts these costs have on local governments and the taxpayers who fund them. This report is intended to inform the debate, and to encourage further study by local governments and other public interest organizations.

While most local governments can quickly and accurately assess the additional tax revenues resulting from a new development, very few can perform the same assessment of costs. This lack of complete information has often resulted in a distorted analysis of development impacts on a local community. A greater understanding of the capital costs associated with providing basic public facilities to serve new development is clearly needed.

This study estimates the cost of public facilities to serve new residential development in Washington State, based on the incremental demand generated by a typical new single-family house. Data has been collected and reported in a manner so as to be reasonably representative of the state as a whole. It is important to recognize that each city and county has its own set of regulations, service level standards, land costs, and materials and labor costs that will affect infrastructure costs. Because of this, each location is unique and different. The report does not attempt to provide accurate costs for any specific location.

This study uses actual cost data from capital projects that have been completed in Washington within that past two years as the primary data source. Some capital cost data, service standards and other necessary information are obtained from local and regional government plans and reports, as cited in the report. The data represents a composite of representative costs from around the state. In this sense, the report can be used as a reasonable initial estimate of costs for a given location when there is no local analysis available.

A literature review provided at the beginning of this report shows that there is a fairly consistent body of literature on the fiscal impacts of growth going back more than 25 years. More than 100 studies were reviewed, and citations to many of these are provided in the endnotes to the report. This literature provides a useful context from which to consider the costs analyzed in this study.

This report helps explain why urban growth so often has a negative fiscal impact, as the new public facilities required – schools, roads, libraries, sewer mains, etc. – create heavy, multi-million-dollar cost burdens for the local governments. Most of these costs are borne by all residents of the community through broad-based taxes and are not paid by the developer or new home buyer.

"Every new classroom costs $90,000. Every mile of new sewer line costs roughly $200,000. And every single lane-mile of new road costs at least $4 million."
Maryland Governor Parris Glendening's remarks at the Brookings Institution (1997)[1]

In the 10 fastest-growing towns in southern Maine, property tax rates increased 43 percent between 1990 and 1995.

Source: *Development and Dollars*, NRDC[2]

LITERATURE REVIEW: What Do Other Studies Show about the Fiscal Impacts of Growth?

The fiscal impacts of growth can be considered in various contexts. While this report addresses the capital costs directly associated with typical residential development, most of the literature is devoted to comparing one growth scenario with another. The most common study compares sprawling, unplanned development with compact, well-planned development. Not surprisingly, these studies tend to find that significant, long-term savings result from the well-planned, compact development alternative. This group of studies successfully argues that financial benefits result from the efficient use of land and public facilities achieved through an orderly, planned development process. This review also summarizes studies which look at other fiscal issues: the effect of growth on local tax rates, the cost of public infrastructure to serve growth, and the fiscal impact of different land uses, including the alternative of conserving land rather than developing it.

Sprawl v. Density

Most of the literature on the fiscal impacts of urban development seeks to address the relatively benign question of whether or not controlling sprawl has beneficial impacts on local finances. The argument is that well-planned, compact land development is easier to serve and requires less infrastructure than poorly-planned sprawling development. Therefore, compact development should result in fewer costs to local government over the sprawling alternative. This conclusion is generally borne out by the "cost of sprawl" literature.[3,4,5,6,7,8,9,10] In some cases the cost savings are dramatic. In others it's almost too close to call.

One of the few fiscal impact studies of this type funded and conducted by a national government, was done in Canada in 1997.[11] It compared life-cycle costs and revenues for two alternative land development patterns over a 75-year period. The conventional suburban development pattern in Ottawa, Canada, was compared with a development plan based on principles of New Urbanism, which involved mixed

uses, varied housing types and more-compact development.

The study evaluated both public and private sector financial impacts (all in Canadian dollars). Over the 75-year period, the compact alternative had a net savings to the local public sector of $5,906 per residential unit and $240 per square meter for non-residential (i.e. commercial). The private sector savings was $3,041 per residential unit and $137 per square meter for non-residential. The primary savings between the two alternatives resulted from a reduction in the initial infrastructure costs for the compact development of $5,151 ($2,110 were public sector savings and $3,041 were private sector savings).

A 1999 study for the American Farmland Trust examined public policies fostering sprawl in California.[12] They found that "*Virtually every significant [public] policy examined favors low-density sprawl over more compact, efficient development of land, primarily through hidden subsidies to sprawl.*" One interesting example identified in the report is a subsidy of electric service costs: "*Ratepayers living in low-density areas receive an estimated $150 a year subsidy to their electric bills, which is paid by Californians residing in areas where land use is more efficient.*"

Growth and Taxes

There is growing recognition that sprawling development patterns rarely generate sufficient revenues from the new taxes they produce to pay their ongoing costs of public services.[13,14] However, even standard urban development patterns that include a mix of commercial development have been found to be a net fiscal drain on local governments. A handful of studies have examined the overall effect of growth in population, jobs and urban development on taxes. These studies show that growth tends to result in higher tax rates, contrary to the conventional wisdom of the past that growth increases the tax base and thereby reduces the overall tax burden.[15,16,17]

A landmark study in 1991 correlated various possible factors with the rising

property taxes observed in DuPage County, Illinois (west of Chicago).[18] The statistical analysis of empirical data by the county planning department examined many possible causes. They found the strongest correlation between new development (residential and commercial) and rising property tax rates. Areas in the county with faster growth had the greatest tax increases. The implication is that new growth creates additional net costs that necessitate tax increases. Like DuPage County, local governments around the country often rely heavily on property tax revenues to pay the costs of growth.

An earlier, but little known, academic study by Buchanan and Weber (1982) examined the impacts of population on residential property tax bills.[19] The authors used cross-sectional data from the 36 counties in Oregon for the year 1977. Five equations were estimated relating tax levies, property values and per capita income to a variety of explanatory variables, including population. The use of multiple equations allowed the authors to identify not only the direct effect of population on taxes, but indirect effects as well. For example, population growth directly affected the per capita tax levy of counties but it also had an indirect effect on property values, personal income, and density. The authors found that the total direct and indirect effect of a larger population was an increase in the average residential tax bill. Overall, a 1.0 percent increase in population was found to increase the average residential property tax bill by 0.41 percent. Counties in Oregon are also highly dependent on property taxes for most of their revenues.

A similar, but more comprehensive, statistical analysis was performed in 1995 to examine the relationship between growth and taxes in the 6-county region surrounding Chicago.[20] The findings were consistent with those of DuPage County. In addition, the researchers found that population growth correlates with an increased residential tax burden (measured as a percent of personal income). Fast-growing areas that did not raise taxes tended to have a reduction in levels of public services.

A major research effort published in 1994 studied the fiscal impacts of population growth in 248 of the larger counties in the U.S.[21] The 248-county study area

included 59 percent of the nation's population. Per-capita spending by counties was used to indicate likely impact on local taxes, since money for government spending must ultimately come from taxes and fees. The study found that current spending (operation and maintenance of government) increased slightly with increasing growth rates at or above the 1 percent annual rate. However, capital expenditures increased markedly for all increases in growth rate. The report states: "*Clearly, population growth puts significant pressure on capital budgets as communities struggle to increase their investment in roads, water and sewer systems, and public buildings.*" The report concludes that not only does population growth increase per-capita tax burdens, it also tends to have a short-run effect of reducing local service quality.

In 1999 the City of Portland, Oregon evaluated the fiscal impacts of alternative growth scenarios on city services.[22] The study found that the current Metro regional growth forecast, based on current growth policies, resulted in a fiscal deficit throughout a 20-year study period (2000 to 2020). An alternative scenario with half the growth rate resulted in a smaller deficit. Again, the implication is that growth results in net costs and therefore more growth results in greater costs and a worse fiscal condition for the city. The analysis looked only at services provided by the city and consequently did not included schools.

Growth and Infrastructure

Numerous municipal studies have been performed to evaluate the cost of providing one or more types of infrastructure to serve new development. These studies may be commissioned for the purposes of establishing development impact fees or for evaluating the demand for costly new public facilities that may be imposed by various alternative growth scenarios or by a major development proposal.[23] While these studies provide an excellent source of information on the cost infrastructure required by new development, they address only some of the infrastructure required (i.e. roads or water systems) and are for a particular city at a particular time. Thus, they form a fragmented, incomplete and often dated picture of the total cost impact. A few studies have tried to integrate this data to form a useful set of cost figures that

can be applied to new development.[24,25]

Oregon's Governor commissioned a task force in 1998 to review the impacts of growth in that state. The task force's report, ***Growth and Its Impact in Oregon*** (January 1999), included a review of fiscal impact literature related to growth. They concluded that the capital costs for off-site public facilities, such as sewer, water, transportation, drainage and schools, total $30,000 to $35,000 for a single family house.[26] A portion of these costs are paid directly by the development through development impact fees ranging from totals of $2,000 to $10,000 depending on the jurisdiction. The balance of the costs are paid through broad revenues, such as income taxes, gas taxes, and property taxes, which are paid by everyone.

Fiscal impact analysis can be very complex and has a number of pitfalls, which can result in misleading conclusions or incorrect interpretations.[27] A draft fiscal analysis for the City of Spokane is being used to evaluate the costs of alternative growth patterns for the Draft Comprehensive Plan.[28] The analysis compares the city's costs and revenues for each of three growth scenarios. The results show a net fiscal surplus for all of the alternatives. To the layperson, this would seem to indicate that all three growth patterns will have a positive fiscal impact on the city. However, the study excluded all capital costs associated with growth in order to simplify the analysis. This methodology renders any conclusions about net fiscal impacts to be moot.

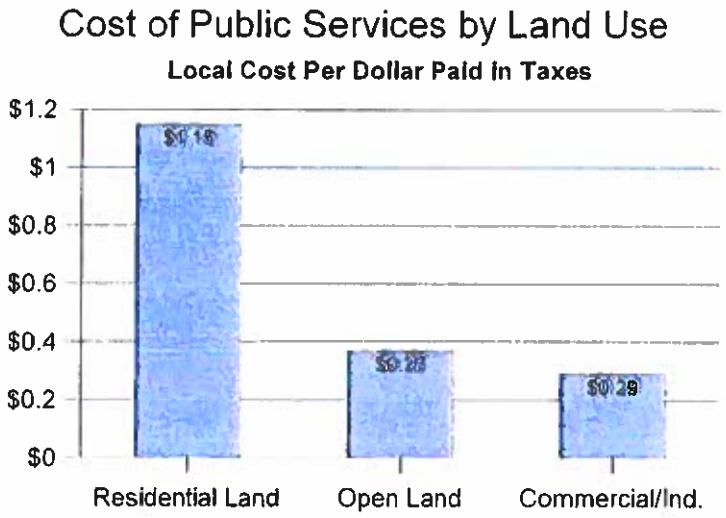
It is becoming increasingly evident that the high capital cost associated with providing the public infrastructure required by new development is likely to be the most significant financial factor to a local government considering urban growth issues and alternatives. While Spokane's draft fiscal impact study may provide some limited information about *relative* impacts of the alternatives, no conclusion can be drawn about likely benefits or costs of growth in Spokane. Furthermore, the study only looked at impacts on city services, and ignored impacts on jurisdictions such as school districts or county and state governments which are also funded by local taxpayers.

The Washington State Legislature commissioned a study in 1998 of local government infrastructure needs by the State's Public Works Board.[29] The study identified $8.16 billion in needed infrastructure from 1998 to 2003 with a funding shortfall of $3.05 billion. Only four categories of infrastructure were included in the study: roadways, sanitary sewer, domestic water and stormwater. Unfortunately the study does not determine the cause of these costs. While it is likely that most of the needs identified in this study are associated with urban growth, the report does not attempt to distinguish growth-related infrastructure costs from other cost.

Cost of Public Services by Type of Land Use

The American Farmland Trust has conducted "Cost of Services Studies" in more than 70 communities across the country. The COS studies looked at the total local revenue and cost stream for each main category of land use: residential, commercial and farmland/open space. While every community is different, they have found that for each dollar generated in taxes, the median cost for residential development is $1.15 to provide public services.[30] Farmland and open space, however cost only $.37 for every dollar in revenue they generate and commercial/industrial cost only $.29 per dollar in revenue. The fiscal deficit caused by residential land use is made up, in part, by surpluses from farmland and other land uses. Numerous other studies have also shown that residential development tends to represent a net fiscal drain to the local government.[31,32,33,34,35,36,37]

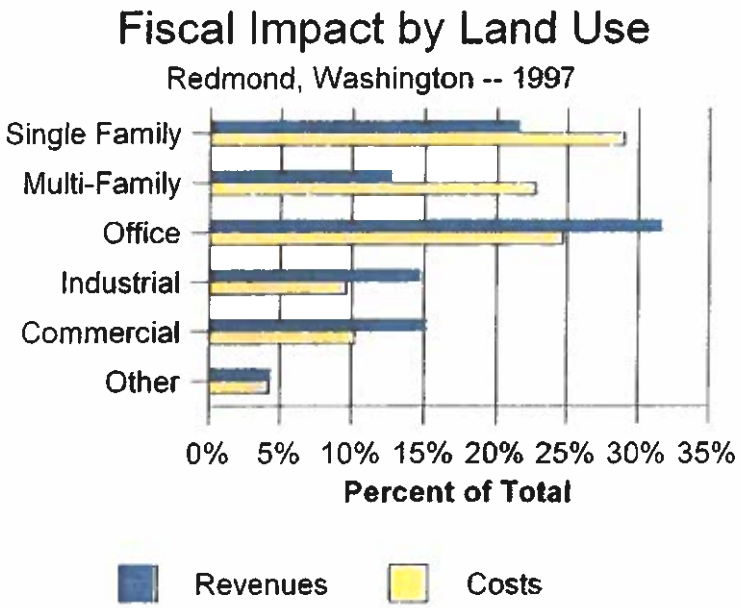
Figure 1



Source: American Farmland Trust.[38] Median cost values for 70 different *Cost of Community Services* studies conducted around the country.

In Redmond, Washington, an analysis by the city of costs and revenues for major land uses found that residential uses cost more to serve than they generated in revenues, while commercial and industrial uses generated a net surplus for the city.[39] These results are dependent on the existing tax and fee structure in a particular locality and may also depend on how the boundaries of the study area are defined. For example, commercial development in one community may produce fiscal benefits while the associated residential development to house the workers may occur in another community that picks up the costs. Some communities seek to encourage only commercial development in the hope that it will generate a fiscal surplus. However, commercial development is likely to generate a demand for nearby residential development as well.[40]

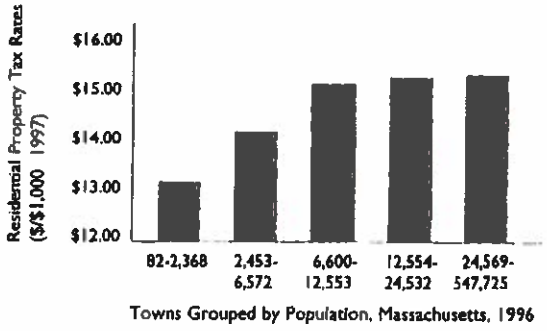
Figure 2



Land Conservation vs. Development

A recent study by the Trust for Public Lands, called ***Community Choices: Thinking Through Land Conservation, Development, and Property Taxes in Massachusetts***,[41] examined the fiscal impacts of land conservation as compared with urban development. It compared property tax rates among Massachusetts towns in terms of various key factors that reflect the amount of growth and development, such as total population, total employment and total business property. A similar comparison was also made based on the total amount of land in conservation. The study did not look at rates of change in the above variables, only at existing levels. While correlations were not evaluated for statistical significance, the relationships are shown in a series of graphs (see example in Figure 3) and indicate that, on average, towns with more land development have higher tax rates.

Figure 3
Town Population and Property Tax Rates in Massachusetts
(Trust for Public Lands, 1999)



The report found that land conservation, which may take some (or all) of the property value of the conserved parcel out of the tax roles, often has the short term effect of reducing the tax base and increasing tax rates. These increases were generally found to be very modest and short lived, due to longer term positive (tax lowering) fiscal impacts. In the longer term, overall positive fiscal impacts are associated with land conservation. The conclusion is that land conservation can help keep property taxes low by limiting increases in the demand for municipal services. The report states:

> *"From a taxpayer's perspective, conservation of a key property may be less expensive than allowing it to be developed in a way that would not provide enough in taxes to cover related services."*

A number of studies have been performed that show a net savings to local taxpayers resulting from land conservation through easements or public land acquisition as compared with the development alternative.[42,43,44] Cities where such studies have been performed include Pittsford, New York; Woodbridge, Connecticut; Bowdoinham, Maine; Yarmouth, Maine; Huntsville, Alabama; Londonderry, New Hampshire; Washington Township, New Jersey; Closter, New Jersey; and Palo

Alto, California.

Recent studies show that park land and open space can contribute to the tax base in another way by adding value to surrounding properties.[45,46] Higher property values generate greater property tax revenues. Natural-area parks have the largest positive effect on nearby home sales prices. Depending on proximity (up to 1500 feet), values increased from $4,337 to $8,971.

The fiscal impacts of land development vary from state to state due to differences in both the revenues and the costs generated. Even within a state, such as Washington, the fiscal impacts will vary from city to city as local tax rates, development impact fees and the costs to serve new development, vary. Rather than generalizing and applying the findings of the literature, it is preferable to have a fiscal impact analysis prepared for specific local conditions and for the particular circumstances under consideration.

WHAT ARE GROWTH-RELATED COSTS?

The realm of impacts of urban growth include social, environmental and economic impacts. These impacts include both costs and benefits. Economic impacts can be readily quantified in a monetary terms and include both private sector (market economies) and public sector (government) costs and benefits.

This study focuses on some of the most readily available of all the impact data: capital costs associated with providing basic public services to new urban development. There are 15 main categories of public facilities required to serve urban growth, as shown in Figure 4. The first 11 categories are typically local government (city or county) or local service district (such as a school or water district). All of these facilities are funded primarily by residents of the local jurisdiction. The final four categories (electric, natural gas, waste disposal and cable/telecom) are typically provided by private utility franchises. These franchises tend to distribute new facility costs across their customer base in a similar manner as local governments use the tax base. This study was limited to an evaluation of the nine categories of infrastructure indicated with a star (*) in Figure 4. This limitation merely reflects the project's priorities and funding constraints.

Figure 4
Growth-Related Capital Costs for
Public Facilities/Infrastructure

- School Facilities (K-12)*
- Sanitary Sewer System*
- Storm Drainage System*
- Transportation System*
- Water Service Facilities*
- Fire Protection Facilities*
- Parkland, Open Space & Recreation Facilities*
- Library Facilities*
- Police Facilities
- Corrections and Jail Facilities
- General Government Facilities
- Electric Power Generation and Distribution*
- Natural Gas Distribution System
- Solid Waste Disposal Facilities
- Cable and Telecommunications Systems

The environmental and social costs of growth (see Figure 5) are likely to be significant, but are difficult to quantify in absolute monetary terms. The values associated with environmental quality, natural amenities, livability and quality of life can, in many cases, be measured in economic terms. New methods are being used to assign economic values to social and environmental impacts. These less-tangible costs may actually have a greater impact on the community than the physical infrastructure costs reported here. While additional research in this area would undoubtedly be productive, the fact is that even the most readily-quantifiable economic impacts of growth have yet to be adequately studied.

Figure 5
Environmental Costs and Other Growth-Related Impacts

- Decreased Air Quality
- Decreased Water Quality
- Increased Rates of Natural Resource Consumption
- Lost Open Space and Resource Lands (farms, forests)
- Lost Visual and Other Amenity Values
- Lost Wildlife Habitat
- Increased Noise
- Lost Mobility Due to Traffic Congestion (delays and increased commute time)
- Higher Cost of Housing
- Higher Cost of Living
- Increased Crime
- Lost Sense of Community
- Increased Regulation (loss of freedoms)
- Costs to Future Generations

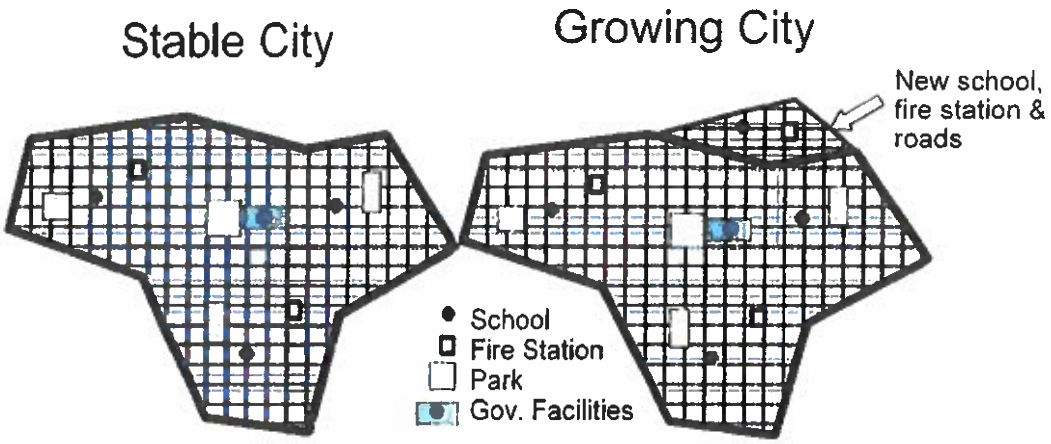
It can be difficult to distinguish growth-related costs from other public-sector costs. Therefore, it is helpful to examine the differences in public expenditures between two hypothetical scenarios: 1) a non-growing or stable community, and 2) a growing community. These two scenarios are illustrated in Figure 6.

In the first scenario, the stable city has had a fairly constant population for some time.[i] All the necessary public facilities — roads, schools, fire stations, parks and government facilities — have already been built and paid for. Taxes are still being collected, and public revenues go to pay for ongoing services and operation and maintenance (O&M) costs. There is no need to expand or build additional facilities

[i] Note that the population of the hypothetical *stable city* scenario is not necessarily static. People could come and go, be born and die, without a net increase in the total number of people. This condition exists when births occur at a replacement level and when as many people move into the area each year as move out of it.

as long as existing facilities are properly maintained. Parts of some facilities will wear out and need to be repaired or replaced. These repairs or replacements, such as a new roof for a school, or re-paving a road, are part of the O&M budget. The stable city scenario serves as a baseline in this analysis by which growth costs are evaluated.

Figure 6
Two Scenarios for Evaluating Growth-Related Costs



If the stable city suddenly becomes a growing city, there will be additional costs to build new or expanded facilities to supply the increased demand resulting from new growth. These are clearly growth-related costs because they do not exist in the stable city scenario. Each increment of growth creates an incremental increase in demand for physical infrastructure.

When the costs for new facilities are paid through property taxes (as with a bond issue or levy), they are spread across the entire community. If the area of new growth in the growing city of Figure 6 represents about 5 percent of the total population, then these new residents will pay roughly 5 percent of the cost of the new facilities required to serve them. The other 95 percent will be paid by the existing residents. In this manner, existing residents continue to pay most of the

costs of new infrastructure required to serve new development. A similar inequity results when other broad-based tax revenues, such as a sales tax, income tax or gas tax, are used to fund growth-related infrastructure needs.

Note that the new school, fire station and roads shown in Figure 6 may be shared by the entire community. Nonetheless, the need for these facilities did not exist in the stable city scenario, because the old facilities were already adequate. This illustrates why most, or all, of the costs of these new facilities are correctly attributed to growth. An example of an exception would be the addition of a city cultural center that creates new benefits for all residents.

Also note that both the *stable city* and *growing city* scenarios have government operation and maintenance (O&M) expenses that vary in rough proportion to the size of the population. Local tax revenues will increase, to some extent, to match the increasing O&M costs of a larger community. However, many state laws limit annual increases in property tax revenues that can occur without a public vote. In cases where the combination of growth rates and inflation exceed the state tax limits, growing O&M needs will go unfunded.

The costs of growth to local government can manifest themselves in five different ways:

1. increased taxes;
2. increased financial debt (usually as municipal bonds);
3. infrastructure deficit;
4. deferred facility maintenance;
5. reductions in public services.

The first two types of cost impacts, increased taxes and debt, are those most people are familiar with and are the traditional means of funding public facilities and services. The remaining three cost impacts are essentially methods of deferring payment of costs. Instead of paying for growth in the present, the costs are pushed into the future. These costs do not become immediate burdens on the local residents and may not appear in the balance sheets of local governments, but will accrue nonetheless.

The third type of cost impact, infrastructure deficit, results when a community falls behind on providing the new and expanded facilities needed to accommodate growth. This cost takes the form of overcrowded schools, congested roads and overflowing sewage plants. The fourth type of cost impact is the deferral of facility maintenance, which results when the funds needed to maintain public facilities are diverted to meet the immediate needs of new development. This shows up as an inability to pay for the basic maintenance of local public buildings, roads, parks and recreation facilities. The fifth growth cost impact shows up as a reduction in the quality or extent of public services. As with deferred maintenance, the needs of new development can divert public funds away from providing basic services. Library hours may be cut back, community centers closed and school programs eliminated.

METHODOLOGY

A fiscal impact analysis (FIA) is a comparison of the financial impacts of various alternatives on a particular governmental body (such as a city, county or school district). A FIA looks at both the total costs and the total revenues generated by each alternative over a given period of time. For example a FIA might compare the costs and revenues of one type of development with another (or with a non-development alternative) over a 20-year period.

This study examines the cost of providing the public facilities associated with residential development in Washington. It is not strictly a fiscal impact analysis, since it does not look at either the total costs or the total revenues. The method used here is similar to that used to calculate development impact fees. The full capital costs of public facilities are apportioned to various land uses (residential, commercial and industrial) based on the amount of demand created by each. Unlike impact fee calculations, the costs developed in this study may include more than one jurisdiction. While impact fees are typically charged just for the city's or county's costs, these costs include all public sector cost regardless of whether they are paid through the city, county, state or federal government.

The demand for public facilities is calculated based on the land use itself and is not allocated to people, per se. This can be illustrated by considering the case of traffic impacts. All traffic demand is generated by people, however not all the traffic demand comes from houses. To allocate traffic demand by land use, each type of development is evaluated for the number of new vehicle trips it will generate. For example, a new house generates an average of 10 new trips per day while a new store may generate several thousand trips. The cost of new roads can be allocated according to how much travel demand each type of land use generates.

The best available data on new homes constructed in Washington comes from the ***American Housing Survey*** for the Seattle-Everett Metropolitan Area. The characteristics of a typical new single-family house built in the Seattle-Everett

Metro Area from 1993 to 1996 are shown in Table 1. New homes have different characteristics than average homes, therefore it is not always appropriate to use an average of all existing homes to represent new development.[ii] Lot sizes for new homes are surprisingly large (13,939 sq.ft.) and are equivalent to a net density of about three units per acre.

The capital costs of providing infrastructure to serve new growth is based primarily on actual cost data from recent capital projects around the state. In order to assure the quality of this data and to establish a rational and objective protocol for selecting capital projects, the following criteria were used to select capital projects for cost allocation in Washington State:

- Recently completed capital project. To obtain the most current and accurate capital cost data, project should have been completed within the past three years (1997 or later).

- Project occurs in a city that is fairly typical of cities in the state and does not have unusual circumstances that would affect capital facilities costs in a significant way. The smallest and largest cities are excluded by limiting project to cities within a size range of 5,000 to 250,000.

- Project involves new or replacement facilities (not repair, maintenance, or upgrading).

- To help ensure the completeness and accuracy of system cost data, selected projects were generally limited to complete systems rather than partial expansions, add-ons or modifications.

[ii] The typical new single-family house being built in the Seattle Area from 1993 to 1996 is 16% bigger than the median for all existing houses. Lot sizes for new homes are 19% larger than those of existing homes, resulting in lower overall density than older developments. Adjusting for the higher occupancy levels of new houses (2.4 versus 2.2 persons) they have 6% more floor area and 9% more land per occupant than exiting houses.

- The preferred projects are those which were part of a long range capital facilities planning process that included population growth forecasts and associated demand analysis.

- Multiple data sets from different cities were used, when available, to help verify that the data is accurate and representative of the state.

While these selection criteria do not assure that capital costs are representative, an attempt has been made to collect enough data to provide a reasonable basis for estimating local costs.

For certain categories of public infrastructure, such as with sewage treatment facilities, very little good data was available and cost estimates are incomplete, as noted in the text. For others, such as with schools, there was more data than could be collected and analyzed under the scope of this project. Data from one dozen newly completed schools in 10 different school districts was deemed sufficient to represent school facility costs in the state. Obtaining precise cost data and other key facts was often quite difficult. In some cases only one or two cities were identified which had suitable quality data and representative conditions.

Table 1
Typical New Single-Family House
Seattle-Everett Metro Area[47]

Characteristic	New Houses*
House Size	
Floor Area (sq.ft.)	2,095
Bedrooms	2.8
Lot Size (sq.ft.)	13,939
Development Density(units/net acre)**	3.1
Occupancy (total persons)	2.4
Floor Area/Occupant (sqft/person)	873
Land Area/Occupant (sqft/person)	5,808

Source: *American Housing Survey.* *Based on the median for new houses constructed from 1993 to 1996. **Excludes land for streets.

The representative house used in this study is assumed to be located within an Urban Growth Area (UGA) with nearby public services. It is assumed that the density in an urban area will be higher than the value in Table 1, since this data also includes rural development. Where a density value is required, a fairly typical net density of six units per acre is used. Lower-density sprawling development will usually cost more to serve than the house examined here due to the greater distances required for constructing roads, sewers, water lines, etcetera.

To accurately determine the capital costs required to serve the needs of new development, the level of service must be held constant. For example, the service standard for the amount of parkland per capita (such as 10 acres per 1000 residents) should be maintained as the community grows. To maintain the service standard, the city must acquire and develop new parks as the local population grows. If the service standard is lowered intentionally or by allowing growth to occur without providing new parkland, then the service standard is declining and the full cost impacts do not appear in the capital facilities plans. Instead, residents will pay indirectly through a decreased urban quality caused by lack of adequate parks. This is often the case with transportation systems where cities are finding that the cost to maintain the existing levels of service are prohibitive. In these cases the full cost of

the transportation system should also include the costs to the public resulting from lower service standards, such as greater traffic congestion and delays. However, cities are generally not calculating these costs.

It is possible to generalize about the costs of capital facilities around the state, since these costs are relatively comparable from one city to the next (with some exceptions). However, each municipality has its own tax rates and fee schedules. Therefore, the net fiscal impacts of development will vary from one city to the next.

All capital costs in this report are for June of 2000 unless stated otherwise. Costs for other years are adjusted using the ***Engineering News-Record*** Construction Cost Index.[48] Due to the difficulty in adjusting land values over time, only the most recent land cost figures available were used in this report and are reported as nominal values (no time-value adjustments were made).

It is important to note that all the costs evaluated here are ***off-site*** costs. A typical new subdivision includes local streets, sidewalks, water and sewer lines to serve each new lot. These are ***on-site*** costs and are the site development costs typically paid directly by the land developer. By contrast, off-site cost are those for the schools, sewage treatment plants, arterial streets, fire stations and other off-site facilities that are needed to serve the subdivision.

Note that financing costs associated with municipal bonds are not considered in this study. Municipal bonds are used to fund many types of infrastructure such as schools and libraries. Financing cost can be substantial and may double the ultimate price of a public facility financed over a 20-year period.

THE COSTS OF GROWTH

This section reports individually on each of the following nine infrastructure categories evaluated in the study:

- School Facilities (K-12)
- Sanitary Sewer System
- Storm Drainage System
- Transportation System
- Water Service Facilities
- Fire Protection Facilities
- Parkland, Open Space & Recreation Facilities
- Library Facilities
- Electric Power Generation and Distribution

The information sources and data are identified and the calculation procedure is described for each type of infrastructure.

School Facilities (K-12)

School facility costs can vary widely from one area to the next depending on factors such as local land costs, and design and construction standards of the local school district. The cost of constructing new schools is based on a telephone survey of ten Washington school districts. The districts were selected from a list of recent projects that had received state funding through the Office of the Superintendent of Public Instruction. Only recently-completed projects or those with bids accepted in the years 1998-2000 were analyzed. The sample included seven elementary schools, two middle schools, and three high schools. Only new or complete replacement projects were considered. School expansions, renovations and upgrades were excluded from the sample due to the difficulty analyzing and categorizing costs.

The capital costs for facilities include all building construction and land acquisition costs as well as planning and design, site preparation, paving and landscaping, playground equipment, furniture, computers, sports and gymnasium equipment, and library collections. Some schools included in the survey were replacement projects that re-used some student desks and library collections. Districts were not able to estimate the value of the re-used capital equipment and no correction was made to the total capital cost. This results in a slight downward bias in the estimate for facilities cost.

Estimating the land cost for schools is more problematic than for buildings. Although the amount of land used for each school is known, only three districts were able to estimate the market value of the land. Only one of these districts had recently purchased the land, a 32.6 acre parcel for $18,400 per acre. This price is roughly an order of magnitude lower than prices for urban land usually quoted by other school districts and municipal parks and recreation departments. On the other hand, the district in question was certain of the price and larger parcels often have a lower cost per acre than smaller parcels. The actual price of school land will depend on local market conditions and the quantity of land purchased. It is possible that the estimated price is downwardly biased due to this outlying observation in a small

sample.

The cost per student is based on the maximum design capacity of the school, which results in a more conservative figure (lower cost) than using actual enrollment, which is typically less than design capacity. School capital costs were allocated to new households using data from the U.S. Census[49] and from the ***American Housing Survey***. School age children (ages 5-17) constituted 19 percent of Washington's population as of July 1999. The fraction of the population in each school level was calculated assuming ages 5-10 attend elementary school, ages 11-13 attend middle school, and ages 14-17 attend high school. The results are shown in the first data column of Table 4 (based on a new household occupancy of 2.4 person per house). On average, each new house will have .46 school-age children, or approximately one school-age child for every two new houses built. This can vary considerably from one area to the next depending on local demographics. High cost areas such as Bellevue are seeing a decline in enrollment as families with children move to surrounding communities seeking lower cost housing. The surrounding communities such as Issaquah, are caught picking up the high tab for new school construction.

Table 2
School Facility Cost (Without Land Cost)

School Level	Average Facility Cost*	Average Design Capacity	Estimated Facility Cost per Student
Elementary	$12,104,415	554	$21,511
Middle	$18,740,304	760	$24,342
High	$29,066,667	1366	$21,428

*Costs and capacities are based on a survey of new and replacement school construction, 1998-2000, for ten Washington school districts. Costs are adjusted to the year 2000 using the Engineering News-Record Construction Cost Index.

Table 3
School Facility Cost (Including Land Cost)*

School Level	Average Land Area (acres)	Average Land Price ($/acre)	Estimated Land Cost	Estimated Land Cost per Student	Estimated Facility Cost per Student	Total Estimated Cost per Student
Elementary	9.16	60,483	$554,024	$1000	$21,511	$22,511
Middle	10.5	60,483	$635,071	$ 835	$24,432	$25,267
High	32.2	60,483	$1,947,552	$1425	$21,428	$22,853

*Land use and costs are based on a survey of new and replacement school construction, 1998-2000, for ten Washington school districts.

Table 4
Total School Facility Cost Per New Single-Family House

School Level	Number of School Age Children per New House*	Total Estimated Cost per Student	Total Estimated Cost per New House
Elementary	.208	$22,511	$4,682
Middle	.104	$25,267	$2,627
High	.144	$22,853	$3,290
Total	.456		$10,599

*The number of school children per new house is based on the ***American Housing Survey***, U.S. Dept. of the Census, for houses constructed from 1993-1996 in the Seattle-Everett Metro Area, Current Housing Reports H170/96-60, November 1997; and the U.S. Dept. of the Census Annual Time Series of State Population Estimates by Age and Sex, July 1999.

School floor area per student is a significant factor in determining the facility cost per student. On average, districts exceeded the state minimum floor area standards (see Table 5). The average high school exceeded the standard by about 12 percent whereas the average elementary school exceeded the standard by about 38 percent. This, in part, explains why elementary schools did not have the expected lower facility cost per student than high schools.

Table 5
School Building Floor Area per Student

School Level	Wash. State Minimum Floor Area Standard* (square feet/student)	Average Floor Area from Sample Schools (square feet/student)
Elementary	80	111
Middle	110	125
High	120	134

*State standards were obtained via personal communication with Brenda Hetland, Office of Superintendent for Public Instruction.

Based on this analysis, the capital cost of providing schools is estimated to be $10,599 per new house. Since some children attend private schools, the public sector cost must be adjusted to reflect this savings. Statewide private school enrollment was 79,543 students in 1999 or 7.4 percent of the total 1.1 million enrolled students.[50] To arrive at a true public sector cost, the total school cost of $10,599 is reduced by 7.4 percent to $9,815 per new house.

While this is a representative cost for providing school facilities, local costs may vary substantially due to land costs, school construction standards and local demographics. Some communities will have a much higher percentage of families with children, which causes the school costs per house to increase. For example, Issaquah was reported to have a cost of $18,600 for each new single-family house in 1999.[51]

Who Pays for Schools?

The decision to construct new school facilities lies entirely with the local district. School districts generally have four main sources of local revenue: the sale of bonds, capital projects fund levies, school impact fees, and interest on investments. The sale of bonds is the primary source of local funds. The State of Washington aids local districts with school construction through revenue from the Common School Construction Fund. The Fund, in turn, receives money from the sale of timber and bonds.[52] The amount of money districts receive is determined by factors, such as the assessed value of taxable property per pupil within the district, local construction costs, and the building space allocated per student. Although the

formula is designed to provide the average district with 50 percent of its capital requirements, in 1999 the state contributed only 24% of the $282 million cost of construction of new schools eligible for assistance.[53]

Transportation System

Transportation system costs include all the roads, sidewalks, curbs and gutters, bike lanes, and street lighting and signalization. Only the costs associated with arterial and collector streets (and associated bike and pedestrian facilities) are included, since local neighborhood streets within a residential subdivision are typically built and funded by the land developer.

Costs for building and expanding public transit systems and high speed rail could also be included under transportation system costs. These costs are not included here simply because it is difficult to accurately allocate costs from multi-jurisdictional transit agencies to local development.

Transportation system costs attributed to new development are best determined through a comprehensive, long range planning process that includes the entire road network and considers all the big and small projects necessary to serve projected growth over an extended time period such as 10 or 20 years. Most comprehensive transportation planning in Washington cities was completed in the mid 1990s for the GMA and has not been updated since. The exceptions are new cities and fast-growing cities that outgrew their existing plan.

Sammamish (population 30,793) is a new city created in 1999. The ***City of Sammamish Interim Transportation Plan*** was completed in January of 2000.[54] The Plan looks at two scenarios: one is growth that has already been vested (for concurrency[iii] purposes) and is in the development pipeline; the other is a buildout scenario in which all the land is ultimately developed according to the currently designated zoning. The capital improvements recommended in the Sammamish Plan are sufficient to maintain the current level of service for the vested pipeline development only. The improvements would not be adequate to meet the travel demand at buildout without severely impacting service conditions.

[iii] *Concurrency* means that adequate road capacity has been determined to be available concurrently with the completion of the development.

As shown in Table 6, all the traffic impacts modeled in the "pipeline development" scenario are from single-family and multi-family residential development. It was assumed that multi-family dwelling units will have 60% of the traffic impact of single-family units since they tend to have fewer occupants. The road improvements necessary to maintain the current level of service for "pipeline growth" in Sammamish will cost $197 million. These include adding new arterial and collector roads, widening roads to increase capacity, and upgrading existing roads. Improvements include local portions of roads outside city limits but in the immediate vicinity of Sammamish which will be impacted by the development (the "growth area"). The plan does not include costs to mitigate other regional traffic impacts on nearby towns like Issaquah or on regional freeways. These too are growth-related transportation costs which are rarely accounted for and are not included here for lack of sufficient data.

Table 6
Growth Scenarios Modeled
City of Sammamish (including Growth Area)

Land Use	Current Conditions	Scenario #1 Pipeline Development	Scenario #2 Buildout Development
New Residential Units			
Single-family	NA	2,640	NA
Multi-family	NA	945	NA
Total new units	[14,832 existing]	3,585	13,700
New Commercial Development (sq.ft.)	[796,000 existing]	0	203,000

Table 7
Traffic Conditions for Each Growth Scenario
City of Sammamish (including Growth Area)

Traffic Conditions	Current Conditions	Scenario #1 Pipeline Development	Scenario #2 Buildout Development
Vehicle miles of travel (VMT)	22,398	26,016	49,879
Speed of peak hour traffic (mph)	25	24	16
Average traffic volume per lane on arterials	252	255	490

All of the $197 million in costs can be directly allocated to serving the new development except for the road upgrades. Many existing roads are built to rural standards. They are narrow, have no shoulders, and lack bike lanes, sidewalks, curbs, and gutters. If the city of Sammamish were to stop growing, these roads might continue to be adequate. However, as the city grows, these roads become less safe and bike and pedestrian use becomes difficult. Upgrading roads to urban standards becomes necessary for the safety and harmony of the community. Should these cost be allocated entirely to new growth, or should they be paid by the entire community? Rather than try to resolve this question here, we have made the assumption that half of the $32 million in upgrade costs are attributed to the new development. Therefore, total growth-related costs are reduced by $16 million to $181 million.

Allocating growth-related costs between single-family and multifamily development in the Pipeline scenario, gives a cost per new single-family house of $56,000. While this cost may seem quite high, it does not fully mitigate regional traffic impacts, as noted above. Most of the costs involve city roads, but county and state road improvements are also included in this cost figure.

Are the growth-related transportation costs unusually high in Sammamish? A similar comprehensive transportation plan done as part of an EIS by Snohomish

County for the city of Lake Stevens revealed that the transportation system costs per new household ranged from $56,770 to $66,200, depending on the size of the Urban Growth Area.[55] Such high costs appear to be part of the price tag of sprawling development into formerly rural areas.

One possible reason these two studies show high costs is because they are financially unconstrained. The plans merely reflect the transportation improvements necessary to maintain current service standards. As such, they fully reflect growth-related costs. Final transportation plans are required to be financially constrained by state concurrency regulations. This means that expenditures must be matched with known revenues. If revenues are insufficient, expenditures must be reduced and service standards may be lowered (worsening congestion).

It is important to recognize that the high cost reported here is a reflection of the expense of maintaining an automobile-reliant transportation system to serve a sprawling land use pattern.

The City of Spokane (population 189,200) is in the process of adopting a new comprehensive plan which includes a transportation plan for the period 2000 to 2020.[56] Several alternative proposals are presented which offer different land use development patterns. The lowest cost alternative is to maintain current land use development patterns at $350.8 million over the 20-year planning horizon. Of the total cost, $166.2 million is for upgrading existing roads to higher urban standards. As explained previously, this expense may not be entirely growth-related. As a conservative (low) estimate, 50% of the upgrade costs, or $83.1 million are allocated to growth. This results in a total, growth-related capital cost of $267.7 million for the transportation system.

Because the Spokane Plan is financially constrained to known revenues, it does not attempt to maintain local standards of service at current levels. The city has not evaluated current system-wide service quality and has not determined how the quality of the transportation system will be affected by future growth. The capital investments described above are based on maintaining a set of minimum standards

for key transportation corridors. The quality of the system may decline to the point at which a key corridor fails to meet the minimum standard adopted in the Comprehensive Plan. As a result, the capital costs associated with the plan are not intended to maintain the current quality of the transportation system, but rather to prevent projected growth from degrading service levels below the minimum standards. In this case, the full-cost impact of growth on the transportation system would also include the cost to the entire community of the increased travel distances, congestion and delays that will result. However, no estimate of these costs is available.

To allocate road costs to new development it is necessary to know how much future travel demand is projected for each type of land use (residential commercial and industrial). Future travel demand was modeled by the Spokane Regional Transportation Council based on the number daily trips generated. Residential land use accounts for 55.7% of the projected growth in travel demand through 2020. Allocating this share of the capital costs associated with the draft Spokane Transportation Plan "current trends" alternative to residential land results in a total cost of $149 million. 68,800 new residents are expected over the 20-year period. Based on 2.4 occupants per new house, this is equivalent to 28,667 new single-family houses. The cost of roads in Spokane is therefore approximately $5,200 per new house.

There is obviously tremendous variation between the Sammamish cost of $56,000 per new house and the Spokane cost of $5,200. This difference warrants further study which is beyond the scope of this project. The Sammamish cost is used here because it represents the full cost to maintain the quality of the overall transportation system.

The relatively few Washington cities which have transportation impact fees typically charge from $2,000 to $3,000 per single-family home. Based on a comprehensive transportation planning approach that maintains service standards (such as that used in the Sammamish Plan) these cities may not be charging nearly enough to cover actual costs.

Sanitary Sewer System

Facilities for wastewater treatment include a collection system and treatment plant, and in some cases, a distribution system. Information on the cost of new wastewater collection systems was not available since no city in the state has recently built a major new collection system. It is rare for a city or sewage district to build an entirely new system. Even systems that are described as new often use some land or administration buildings that were pre-existing. The amount and value of pre-existing capital is often difficult to determine.

For example, the City of Sumner had a new sewer system project which added one new aerobic tank, but also rebuilt the existing tank.[57] The value of the shell of one used aerobic treatment tank was not known or included in the cost of capital. This results in a conservative (low) estimate of the cost of sewage treatment facilities. The cost for most of the projects surveyed were similarly conservative.

The Water Quality Program of the Washington State Department of Ecology regulates sewage treatment in the state. Department personnel provided a list of recently finished sewage treatment projects that were essentially complete replacements, although as noted, some equipment is invariably reused.(2) Nine cities were surveyed: Sumner, Puyallup, Cheney, Washougal, Mossy Rock, Ilwaco, Woodland, Yelm, and North Bay/Case Inlet.[58]

The costs for plant construction are easily identified from the bid procedure. Relating costs to the number of potential residences that can be served is more difficult due to different measures of system capacity, system characteristics, and the different proportions of residential/non-residential use in each city. Estimates of residential use of plant capacity range from 55% for Sumner to 90 percent for Ilwaco.[59] No estimate of non-residential use was available for Yelm and Mossy Rock so it is assumed that all of the capacity is used for residences. In these two cases the capacity measure used is Equivalent Residential Unit (ERU), which is usually around 230 gallons per household per day, depending on system inflow and

infiltration. In the other cases the residential capacity is based on population and current use in the city.

Treatment plants may be categorized by the quality of their output. Most modern plants provide secondary treatment levels. An improvement in water quality is achieved by tertiary treatment. Tertiary treated water may be re-used with some limitations. The costs, in 2000 dollars, for the seven plants that achieve a secondary level of treatment are presented in Table 8.

Table 8
Costs for Secondary-Level Sewage Treatment Plants
(in 2000 dollars)

City	2000 Population	Facility Cost	Residential Capacity	Cost per Residence
Woodland	3795	7300000	3166	2305
Ilwaco	819	4000000	1620	2469
Mossyrock	545	2300000	800	2875
Washougal	8125	5500000	6666	825
Cheney	8545	12540000	4107	3053
Puyallup	30940	21527000	24344	884
Sumner/Bonney Lake	18885	16000000	14526	1101

Cost per house among the cities surveyed ranged from $825 to $3,053. The average cost per residence for the seven plants listed in Table 8 is $1,930. Part of the differences in cost may be explained by economies of scale; some of the lower cost plants serve larger communities. Another likely explanation is that the differences reflect different amounts of re-used capital.

Two communities had plants that achieved tertiary level treatment. These plants represent the future for wastewater treatment. In the City of Yelm, the collection system is pressure tight plastic pipe with virtually no inflow and infiltration. The output is gray water that is used for lawn and garden irrigation, fire fighting, and to establish a wetlands. The cost for tertiary level treatment plants is presented in Table 9.

Table 9
Costs for Tertiary-level Sewage Treatment Plants
(in 2000 dollars)

City	2000 Population	Facility Cost	Residential Capacity	Cost per Residence
North Bay Case Inlet	NA	5250000	1260	4166
Yelm	2940	9600000	4166	2304*

* Other private costs exists for this case. See text.

The average cost per residence for tertiary treatment is $3235. A possible explanation for the low cost of treatment in Yelm is that not all of the sewage is treated at the plant. The system relies on septic tanks at each residence in addition to the treatment plant. The sludge from the septic tanks must be pumped out every few years and spread on fields. The homeowner faces the additional private cost for installing the septic tank.

The figure of $1930 per residence for the cost of sanitary sewer service is used in this study. This does not include the cost of collection systems nor does it include the cost of environmental degradation that results from using secondary, instead of tertiary, sewage treatment.

Stormwater Drainage System

The Washington Department of Ecology regulates stormwater discharge from new construction sites. The department requires two permits for clearing or grading a construction site over five acres, a General Permit to Discharge Stormwater Associated with Construction Activity (Stormwater Discharge Permit) and a National Pollutant Discharge Elimination System (NPDES) permit.[60] The latter is issued under authority delegated by the US Environmental Protection Agency.

The permits require the permittee to develop a Stormwater Prevention Pollution Plan, comply with SEPA regulations, and draft a public notice. The Stormwater Prevention Pollution Plan generally consists of Best Management Practices (BMP's) offered by the Department of Ecology in its Stormwater Management Manual.[61] The BMP's are based on site specific conditions and are implemented and paid for by the permittee.

The Department of Ecology is writing new stormwater discharge standards, commonly called duration control standards, for the entire state. Unincorporated portions of King County, however, have been using duration control standards since 1998. Conversations with personnel from the Department of Ecology and the King County Department of Natural Resources confirmed that essentially all the capital costs incurred mitigating stormwater discharge from new construction are paid privately.[62]

King County conducted a cost estimate of complying with the new standards and concluded that costs for residential development could decrease, remain the same, or increase depending on the nature of the development.[63] In urban areas the study estimated that about 60% of residential development would face a decline in cost primarily due to the use of smaller detention facilities. In rural areas, however, the new standards mean that fewer developments are exempt from stormwater controls and about 41% of developments will face an increase in costs. The estimated costs of complying with new duration control standards in King County are given in Table

10. These costs are paid privately.

Table 10
Estimated Private-Sector Costs of Complying with Stormwater Duration Control Standards
King County, WA

Development type	Percent of development type	Decrease in costs	Percent of development type	Cost (no change)	Percent of development type	Increase in costs
Urban residential	60%	$8,200 to $5,400/lot	19%	$11,500/lot	15%	$6,700 to $7,900/lot
					6%	$11,600 to $15,900/lot
Rural residential	39%	$6,400 to $4,800/lot	20%	$5,100/lot	36%	$2,500 to $6,400/lot
					5%	$5,200 to $6,900/lot

King County does charge a stormwater utility fee to cover operation and maintenance, planning, and review of stormwater discharge systems. The base fee is $85.62 per year for residences. The fee for commercial sites is based on the amount of impervious surface area.

Communication with the Spokane Department of Engineering Services, the Tacoma Department of Public Works, and the Bellevue Utility Department confirm that, excepting incidental cases, the capital costs of stormwater control for new development is paid by the private sector.[64]

The occasional exception to the rule of privately paid capital costs occurs when infill construction occurs in a dense urban area and on-site mitigation is not physically possible due to limited space. In this case, mitigation may occur elsewhere at public expense. The money to pay for mitigation comes from the stormwater utility fees that fund the general stormwater program. No estimate is available for the cost of this type of mitigation.

Water Service Facilities

The capital costs of a water system include the water source costs (water rights, wells, watershed protection, etc.), water treatment or filtration plant, storage reservoirs, pumping stations, and transmission and distribution piping. Two cities, Seattle and Kalama, are in the process of building new filtration plants and one city, South Bend, has recently completed a plant. However, no cities have been identified that have new storage or distribution systems. Therefore, this section addresses only treatment plant costs.

Seattle

Seattle (population 540,900) provides 150 million gallons per day (mgd) of potable water.[65] About 50 percent is sold to Seattle customers, 41 per cent is sold to wholesale buyers, and nine per cent is considered non-revenue.[66] Non-revenue use is due to leaks, government use (such as fire fighting), and non-metered use.

The average output of the new plant will be 45 mgd, almost identical to the estimated average usage of Seattle residential customers, 44.3 mgd. The capital cost of the new plant is bid at $65 million. The capital cost per gallon of water output is $1.44. It is assumed that the plant's capacity is devoted to Seattle's residential use and that there are 2.4 people per new house. The cost of water treatment plant alone in Seattle is estimated to be $288 per house.

Kalama

Kalama (population 1,685) provides water to about 3,000 people.[67] The city is currently operating a pilot plant using diatomaceous earth and developed estimates for construction of a complete plant. The new plant is estimated to cost $3 million and would serve 8,000 residential customers plus industry with a capacity of 3.2 mgd. This results in a plant cost of $0.94 per gallon of output capacity. Residential use in King County averages 81 gallons per day per person.[68] Assuming this same

usage rate in Kalama implies that about 20 percent of the plant capacity (and cost) should be attributed to residential use. Based on 2.4 people per new house, the cost of water treatment in Kalama will cost $184 per house. City officials in Kalama estimated that a conventional filtration plant would cost 50 percent more than the diatomaceous earth filtration plant.[69] Thus, a conventional plant would be expected to cost $276 per household, very close to the cost of the Seattle filtration plant.

South Bend

South Bend (population 1,645) has a water system that supplies the city and furnishes water to an additional 140 households in the surrounding unincorporated area.[70] The city recently completed a 0.978 mgd plant for a cost of $2.44 million. The capital cost per gallon of water output is $2.48. Assuming 81 gallons per day per person consumption, the cost per new house is $482 for water treatment facility costs only. The City of South Bend has unusually high leakage losses of 40-50 percent in their water delivery system. This would increase the actual cost to at least $804 per residence in this particular city. It is assumed in this report that new development does not contribute to the leakage problem and therefore a new house is allocated only $482 in costs. The city has a small capacity system which uses membrane technology. This may account for the higher cost compared to the larger systems.

The average cost for the three cities' water treatment systems, excluding the cost of South Bend's unusual leakage, is $348 per house. Distribution system costs are not included.

Parkland, Open Space & Recreation Facilities

There are several methods for allocating parkland and recreational facility costs to the various land uses. The predominant method is to assume that the costs of parks and recreation facilities are attributed entirely to residential development. However, it is also reasonable to assume that commercial development benefits to some degree from urban parks and therefore should help bear some of the costs. For simplicity, all costs in this category are allocated to residential land use in this report.

Six larger cities were surveyed to estimate the cost of municipal park acquisition and development. The cities were selected based on having adequate record-keeping and recent parkland purchases. Due to variations in the quality of the data, two of the cities are presented as case studies, while the remaining four are presented as a cross-sectional analysis.

The City of Bellingham

A detailed insight into the cost of acquiring park land is offered by examining the Greenway Program of the City of Bellingham (population 64,720).[71] The program is funded by a special short-term levy. The city has made regular purchases of parks and natural open space areas every year since 1991 and has kept detailed data on purchases.[72] The average cost for the 24 parcels (83.3 acres) of open space and park land purchased for the years 1998-2000 was $51,597 per acre. The average cost for the eight parcels (31.3 acres) which will be used as urban parks was $67,322 per acre, reflecting the higher price of urban land.

During the time period Bellingham has implemented its greenway acquisition program, the city's population has increased an estimated 11,690 people and the city has added 266 acres of parkland. This is approximately 23 acres of parks and open space per 1000 new residents, a considerably higher level of service than the formal standards commonly adopted in other city's management plans. However,

Bellingham has an even higher adopted standard of 35.6 acres of parks and open space per 1000 residents. The city has now achieved a level-of-service of approximately 34 acres per 1000 residents. Based on the actual service level (34 acres per 1000 residents), the cost of providing unimproved parkland to the 2.4 residents of the typical new house is $4,210.

Some insight into the cost of developing parks and constructing new recreational facilities may be gained by examining the 1994-99 budget for new construction.[73] The Parks and Recreation Department budgeted $9,657,000 (1999 dollars) for 27 new construction projects for this time period including a pool, a theater, athletic fields, and a golf course. The actual expenditure for new park land and open space during the same period was $7,226,000 (nominal costs).[74] Over a six year period then, new construction was expected to cost about 133% of what was being spent on land acquisition. This implies that the total cost for parks and facilities is about $9,810 per new house.

The City of Kirkland

The Parks and Recreation Department of the City of Kirkland (population 45,090) has standards of 1.3 acres/1000 people for neighborhood parks, 1.6 acres/1000 people for community parks, and 5.7 acres/1000 people for nature parks for a total of 8.6 acres/1000 people. The city currently has 458 acres of urban parks and nature parks, yielding a total of about 10 acres per 1000 residents. The Parks and Recreation Department estimated the average price for their urban park land to be $400,000 per acre, reflecting its development potential in an urban area.[75] The price for nature parks is somewhat lower due to reduced development value of some parcels (for example, a wetland area was purchased for $30,000 per acre). Therefore, a figure of $100,000 per acre is assumed for nature parks. Based on 2.4 people per new house, the land cost for all park land is estimated to be $4,160 per house.

The department estimates that facilities cost $400,000 for neighborhood parks and $2.5 million for community parks. This includes the costs of playing fields, courts, and restrooms, but does not include larger facilities such as swimming pools. If it is

further assumed that neighborhood parks are five acres in size and community parks are 40 acres, the cost for all facilities is estimated to be $490 per household. The total cost for park land and facilities in Kirkland is estimated to be $4,650 per new house.

Cross-sectional Analysis

The cost of urban land varies enormously. For example, in Spokane the price of park land varied from $6,250 per acre to over $600,000 per acre, a ratio of almost 100 to one. As another example, the City of Bellevue purchased 5.47 acres of parkland during the period 1998-2000 for a total cost of $12,004,000. This is an average cost of $2,195,000 per acre. A portion of the land fronts Lake Washington and is unusually expensive.

In such situations, relying on an average land price to forecast the cost of a particular park may be misleading. However, knowing an average price is useful for general analysis at the state level. A survey of parks purchased between 1997 and 2000 in Spokane, Kenniwick, Bellevue, and Yakima yielded an average land price for eight city parks of $197,400 per acre.

The cities in the survey also had varying standards for the quantity of park land desired. Standards ranged from a high of 8.6 acres per 1000 people down to 3 acres per 1000 people. Several of the cities have refined the standards slightly to allow for different standards for neighborhood parks, community parks, and natural areas. No standards were found which address the facilities or types of recreational experiences that park users demand. The average land area standard for all types of parks is estimated to be 5.7 acres per 1000 people.

Based on 2.4 occupants per new house, the estimated average cost of the park land alone is $2,700 per household. This does not include capital improvements made to parks, which, may be more than the cost of the raw land.

Parkland Summary

There is significant variation in the cost of providing new parks and open spaces in Washington. Land prices vary over orders of magnitude and facilities range from non-existent to expensive swim parks. The average cost based on the two case studies (Bellingham and Kirkland) is $7,230. Evidence collected indicates that total costs typically lie in the $3,000-9,000 per house range. A midpoint cost for parks and recreation facilities of $6,000 per new house is used in this report.

Fire Protection Facilities

Fire protection facilities include all capital costs associated with building a fire station, acquiring land, and providing the necessary equipment, including fire trucks and other vehicles. It can be difficult to allocate the costs of a fire station to residential development since the service area is often hard to define and includes a mix of land uses. A fire station's service area may also overlap with other nearby stations. The limits of the service area are usually determined by response time and might include all property that can be reached within a four minute drive. This may be further limited by topographic features, accessibility and the distribution of development around the station.

King County Fire District #26 in the City of Des Moines (population 26,700) is completing a new fire station that will serve the entire city. This provides an excellent case for cost allocation, since the service area is well defined. The $5 million bond approved by voters was issued in 1998 and covers all capital cost for the new facility including a new pumper truck ($350,000), refurbishing a second fire truck ($60,000), and an aid car ($100,000) for providing onsite medical assistance.

According to the Fire District, the new station will serve all of Des Moines with the exception of two small areas that are covered by other fire districts. The station will have a service area of 5½ square miles and respond to an average of 2700 calls per year. To arrive at a reasonable distribution of facility cost, the 5½ square mile service area was assumed to be filled with single family houses at a density characteristic of new subdivisions (6 units per net acre). Facility costs were distributed evenly across all of the "potential units" in the service area. The cost per single-family house is $331. The cost for fire protection facilities is the lowest of the eight cost categories calculated in this study. This finding is consistent with a recent analysis in Oregon where similar costs were determined to be $298 per house.[76]

Library Facilities

As a community grows, increased library capacity is needed. Issaquah has outgrown its existing library and is replacing it with one twice as large. Voters approved an $8.1 million bond in November of 1996 to fund a new 15,000-square-foot facility. The bond will cover all capital costs including construction, land acquisition and additional library materials. The new library will serve a portion of the Issaquah School District. The balance of the School District lies in the new town of Sammamish, which also has a new 10,000-square-foot library. The Sammamish library was completed in 1998 at a total cost of $5.9 million (adjusted to 2000 costs).

According to the School District, the population of this service area is 53,000 people. The combined cost of the two libraries serving this area is $14 million. The per-capita cost of the local libraries is $264.

In some instances libraries are oversized to accommodate future growth, however given the ½ square foot per resident size rule used by some library officials, the new libraries are just adequate for the service area. Rather than overbuild the Issaquah library, the building was designed so it could easily accommodate future expansions.

The Issaquah library is part of the King County Library System. The Library System has just completed a new service center which serves all of the county's libraries. The service center cost $22 million and serves the entire King County population of 1,685,600. This adds an additional capital cost of $13 per capita for a total library facility cost of $277 per capita. Based on a new house occupancy of 2.4 people, the cost per new house for library facilities is $665.

Libraries in King County are an independent taxing district. Their operating budget comes from county property taxes. Local library construction is typically funded with a voter approved bond issues that is also paid through property taxes within the voting district.

Electric Power Generation and Distribution

Each new house requires electric service to operate standard household appliances, lighting, electronic equipment, and often for hot water, space heating and air conditioning. The local electric utility must provide additional power generation capacity to meet this new load[77] and distribution facilities must be able to carry the power from the generation source(s) to the house via a high-voltage transmission and distribution system.

Energy facilities are different from other public facilities in that they are typically owned and operated by a private utility company, rather than a local government. The utility has an exclusive franchise for the service area. While the cost of expanding the electrical system does not impact local taxes, the cost is borne in a similar manner by local ratepayers.

Utilities often claim that new customers eventually pay for the cost of expanding the system through their electric bills, however this is rarely the case. The capital costs for expanding the generation and distribution system are typically distributed evenly across the rate base (all power users), regardless of whether they are new customers or existing customers. Since new and old customers pay the same electric rates, new users receive a substantial subsidy to cover most of the costs of system expansion. The resulting funding inequity is similar to that which occurs when municipalities fund local infrastructure expansion through broad-based tax revenues such as property taxes.

There is no available data in Washington which break out capital costs from O&M costs. All available cost data on power generation and transmission and distribution (T&D) include both the cost of adding new capacity and the cost of operating and maintaining the entire system. Total power generation costs amount to 58% of the cost of electricity while T&D amounts to 33% of electricity cost in Washington.[78]

Power Generation Costs

There is no data comparing energy use of new homes with the average home in Washington. New homes typically are better insulated than the average home and have appliances that are 25 to 40 percent more efficient than those sold in 1990.[79] On the other hand, new homes are bigger with more space to heat and cool, are more likely to have air conditioning, and are likely to have more appliances, more electronic equipment and more luxury amenities (like spa baths, saunas and hot tubs) than the average house. The assumption used here is that these factors balance out and the typical new house uses about the same amount of energy as the average house. An average house in Washington requires 5 kW of generation capacity to serve it during a period of peak system-wide demand.[80]

Most new generating capacity is in the form of combined-cycle natural gas turbines. These are among the least expensive power generation systems to build. According to the Northwest Power Planning Council, the cost for a new 230 MW generation unit is $637 per kW.[81] Therefore, the 5kW of generation capacity required by a new house would cost $3,185.

Transmission and Distribution Costs

The T&D system includes the high voltage transmission system, medium voltage distribution system, and low voltage local service. Voltage is reduced in stages with transformers as the distribution system approaches the end user.

The on-site electric service connection from the power distribution system to the house may be funded by the utility or by the developer, depending on the policy of the local utility. Virtually all new local service in Washington is placed underground. The developer may be required to provide the utility trenches and perform the backfilling after the utility has laid the power lines. The developer may also be required to pay for some, or all, of the cost of the local service connection (power line and meter). However, many utilities offer allowances on the order of $1000 for each service connection. In this situation the utility picks up the cost of

the service connection up to the amount of the allowance. This amount is funded through the rate base.

Utilities in Washington are not required to report the T&D costs associated with adding new customers or new power load (referred to as "marginal costing"). However, this data is available in Oregon and experts familiar with both states say that these costs would be virtually identical in Washington. Therefore, Oregon T&D cost data is used as the best available proxy for Washington. The most recent marginal cost data are from a 1997 rate case filed by Portland General Electric (PGE). These costs were evaluated by the Citizens Utility Board of Oregon to determine the distribution system costs associated with adding a new residential customer. The costs are based on providing buried (underground) service and assume that there is no developer contribution beyond providing the utility trench and backfill.

As shown in Table 11, T&D costs range from $6,927 for an electrically heated house to $3,857 for non-electrically heated. Since new houses use both forms of heating, a midpoint cost of $4,942 is used here for T&D costs.

Table 11
Power Distribution Costs for New House

Cost Area	Residence with Electric Heat	Residence, Non-Electric Heat
Transmission	$112	$68
Substations	$103	$62
Wires	$4,768	$2,897
Service	$419	$419
Line Transformer	$549	$334
Electric Meter	$49	$49
Customer Service	$27	$27
Total:	$6,027	$3,857

Source: Analysis by Citizens Utility Board of Oregon of the Portland General Electric *Marginal Cost Study*, filed December 1997.

Based on the PGE study, CUB estimates that the cost of adding 12,000 new residential customers a year to PGE's distribution system increases the average electric bill by about $8 per month for the utility's 600,000 existing residential customers. (Generation costs would also add to the electric bill.)

Combining generation costs with T&D costs, as shown in Table 12, gives a total cost of $8,127 to serve each new house.

Table 12
Total Electric Power Generation and Distribution Cost for New House

Cost Area	Cost per New House
Generation	$3,185
Trans & Dist	$4,942
Total Cost	$8,127

Cost Summary

The total cost to the public sector to provide the nine categories of infrastructure evaluated here is approximately $83,000 per single-family house, as shown in Table 13. Most of these costs are due to the transportation system alone, at $56,000. Schools rank a distant second in terms of cost, but still represent a significant expense, at $9,800. Surprisingly large costs are associated with providing both electric power generation and distribution facilities ($8,100) and parks and recreation facilities ($6,000). Note that these costs do not include any financing costs, which would add to the total expense.

The costs reported for sanitary sewerage and water systems cover plant costs only. No data was available for recently completed sewage collection or water distribution systems, so these costs were not included in the total. Stormwater drainage represents a significant public cost in many states. However, in Washington these costs are usually borne by the private sector and no cost is included here for stormwater facilities.

State-wide costs for residential infrastructure can be estimated using home construction data. For 1999, a total of 41,483 permits were issued for residential units.[82] Sixty-six percent of these were for single-family and 34 percent were for multifamily units. Where impact fees are being collected, these fees should be deducted directly from the total costs calculated in this study. If it is assumed that average impact fees around the state are $2,500 per single family house, the net cost is about $80,500 per new house. A multifamily housing unit has approximately 60% of the cost and impact as a single-family home. Assuming impact fees are also about 60% of the single-family rate, the net cost would be approximately $48,300 per new multifamily unit. A rough estimate of the total annual statewide infrastructure cost associated with residential development is about $2.87 billion.

Table 13
Growth Cost Summary*
New Single-Family House – Washington, 2000

Cost Item	Amount
Transportation Facilities	$56,000
School Facilities [A]	$9,815
Electric Power Generation and Distribution Facilities	$8,127
Parks and Recreation Facilities	$6,000
Sanitary Sewerage (plant only)[B]	$1,930
Library Facilities	$665
Water System Facilities (plant only)[C]	$348
Fire Protection Facilities	$331
Stormwater Drainage	NA[D]
Total:	$83,216

* This is a summary of the capital costs reviewed in this study and is not a complete listing of growth-related costs. A) School facility costs can vary widely depending on local standards and demographics. B)Sewage collection system costs were not available. C) Water distribution system costs were not available. D) These costs are borne by the private sector in Washington.

HOW ARE GROWTH-RELATED COSTS PAID?

In general, Washington's mix of local financing and revenue sources for capital projects is complex, different for each community, and changing from year to year. An excellent source of information for those seeking to understand how capital projects and growth-related infrastructure are funded is ***Infrastructure Financing for Small Communities in Washington State*** by The Washington State Department of Community, Trade and Economic Development.[83]

This study focuses on improving understanding of the capital cost generated by new residential development and a review of public finance is well beyond the scope of the project. However, it is possible to simplify the issue somewhat by focusing on the matter of equity.

If it is assumed that the benefits of newly expanded infrastructure go primarily, or entirely, to new development, then shouldn't the costs also be paid primarily or entirely by that development? Currently, the key issue regarding the equity of funding public infrastructure is whether these cost are distributed across the entire community or placed directly on the new development. Most taxes, such as sales and property taxes, are broadly distributed across the local population. Everyone pays. When broadly-based revenues are used to fund infrastructure serving new development, questions of equity arise. Are residents of the community receiving benefits commensurate with their contributions? Are they receiving any benefits? These are important questions which need to be discussed and resolved in a public forum.

Development impacts fees provide one method for assigning the capital costs described here to the new development which generates them. The state's Growth Management Act specifically authorizes cities and counties to collect impact fees for certain categories of infrastructure. The State Environmental Policy Act (SEPA) also enables local governments to mitigate development impacts through fees. Currently only a small portion of Washington's cities and counties collect impact

fees, and those that do, often collect much less than the full cost.

Developers often contend that these fees force up the price of housing. While development impact fees may cause new home prices to increase, it is important to recognize that these fees are not *new* costs created by government bureaucracies. The costs are created by the new development. The real question is who should pay them. The role of impact fees is to shift costs out of the general tax base and onto specific developments. This provides general tax relief and thereby lowers the cost of housing for the whole community.

Another argument against impact fees is that the new development will eventually pay its share of costs through regular tax payments. While tax payments by new development may contribute a small amount to the infrastructure costs incurred by the community, the amount is probably only on the order of 1 to 5 percent (as explained in the section *What are Growth-Related Costs?*).

On the other hand, many of these public facilities carry additional financing costs that are also paid by the community, usually as bond interest rates. Financing costs can increase the total price of infrastructure by 100 percent over a 20 year period. Neither the tax contribution of new development, nor the financing cost of capital are examined in this study.

CONCLUSIONS

The general findings of a literature review of the fiscal impacts of growth are that, in most instances, urban growth results in real net costs to local governments. Residential development in particular is likely to represent a net fiscal drain. The fiscal burden of residential development may be high enough to make land conservation (through acquisition or easements) a viable, cost-saving alternative where land costs are moderate.

Fiscal impact analysis appears to be gaining recognition as an important tool for evaluating local land use and development policy decisions. A greater use of this analysis tool by local governments in Washington would shed needed light on how urban growth is impacting communities in the state. To achieve a real understanding of growth's fiscal impacts, the substantial capital cost of the infrastructure growth requires, must be included in any analysis.

Based on the evaluation of costs to provide nine categories of public infrastructure in this study, typical residential growth creates a substantial capital cost burden to the local community of approximately $83,000 per new single-family house. The total extent of this cost burden is not widely known or reported. A rough estimate of the total annual statewide infrastructure cost associated with residential development is about $2.87 billion. This is equivalent to an annual cost of about $500 per person in the state.

As noted in the report, many of these costs are not being paid directly, but are manifesting themselves in declining levels of service. For example, the most expensive category is transportation, where the road system expansion costs are about $56,000 per house. These high costs are required to maintain the service levels of the transportation system. However, many communities find the cost of maintaining service standards is too high, and settle for greater congestion instead.

The negative fiscal impacts of growth reported in the literature are a result of the

system of taxes and policies which act to subsidize growth at the expense of all taxpayers. Policy-makers, if they wished, could act to remove these subsidies so that growth paid its own way and was not a financial burden on the residents of a community.

Development impact fees are being used by some Washington cities and counties to help fund infrastructure. However, most local governments in the state charge no impact fees at all, and those that do often charge much less than the full cost to serve new development. The use of impact fees represents an opportunity to better fund infrastructure needs and to achieve greater equity in revenue collection.

The findings in this report are consistent with most of the literature on the subject. New urban growth creates demands on local governments for both expanded public services and new capital facilities. The high cost of the capital facilities shown here provides a possible explanation for the increasing tax rates and negative fiscal impacts associated with growth. Since rapid growth will dramatically increase demand for public facilities, this may explain findings in the literature showing that areas with the highest growth rates also have the highest tax increases.

The research for this report would have been greatly facilitated had more local governments collected and reported capital costs associated with serving new growth in a useful way. While most local governments carefully distinguish dozens of line items, very few can distinguish growth-related costs from other costs. As citizens are becoming increasingly aware of the fiscal impacts of growth, local governments are beginning to provide better reporting of growth-related costs.

□

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Letter No. 12

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Jennifer Mortensen < m ensen reservewa.org>
Sent: Friday, July 10, 2020 4 PM
To: Mark Hofman
Cc: Meisner, Jennifer; Todd Scott; Griffith, Greg (DAHP); Chris Moore
Subject: DEIS Comments - Snoqualmie Falls Lumber Company
Attachments: WA Trust DEIS Comments - Snoqualmie Falls Lumber Company.pdf

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hello Mark,

Attached please find comments from the Washington Trust for Historic Preservation regarding the draft EIS for the Snoqualmie Falls Lumber Company site. Thank you for the opportunity to comment, and please don't hesitate to contact me with any questions.

Thanks,

Jennifer (Jay) Mortensen | Outreach Director
she / her / hers

Washington Trust for Historic Preservation
1204 Minor Avenue | Seattle, WA 98101
206-462-2999 (d) | o: 206-624-9449 (o)

preservewa.org

WASHINGTON TRUST
FOR HISTORIC
PRESERVATION

July 9, 2020

Mr. Mark Hofman
mhofman@snoqualmiewa.gov
SEPA Responsible Official
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98605

[sent via electronic mail]

Dear Mr. Hofman:

I am writing on behalf of the Washington Trust for Historic Preservation in response to the Draft Environmental Impact Statement (DEIS) released for the Planned Commercial/ Industrial complex at the Snoqualmie Falls Company Mill site. The Washington Trust is a private nonprofit organization dedicated to saving the places that matter in Washington State and to promoting sustainable and economically viable communities through historic preservation.

The Snoqualmie Falls Lumber Company mill site is significant to the lumber industry in Washington State, as well as broader patterns of national economic development, which is evidenced in section 6. of Appendix E of the DEIS. The Washington Trust concurs with he consultant's conclusion that the site is eligible for listing on the National Register of Historic P aces as a historic district. 12-1

In response to the proposal for Planning Area 1, additional mitigation is needed to compensate for the adverse effects to cultural resources at this site. The Washington Trust recommends that a National Register of Historic Places nomination be prepared for the entire mill site, and that its history, including the history of the Japanese Community, be interpreted onsite within the planned development for the public to learn about its historic significance. 12-2

f development moves forward in Planning Areas 2 and 3, all efforts should be made o preserve and incorporate the remaining historic elements that contribute to the character of the h storic district, including but not limited to the Planer Mill-Crane Shed, Crane Shed No. 3 and the Package Lumber Shed which are specifically mentioned in Appendix E as being potentially adversely effected. The Washington Trust encourages he developers to explore both state and national tax incentives related to historic preservation, which wou d become available to the project through designating the site as a historic dis rict. 12-3

STIMSON-GREEN MANSION, 1204 MINOR AVENUE, SEATTLE, WASHINGTON 98101
T 206-624-9449 F 206-624-2410 | preservewa.org

If adverse affects to historic resources cannot be avoided for Planning Areas 2 and 3, mitigation beyond HABS Level III documentation as proposed in Appendix E will be needed. The Washington Trust recommends that any necessary demolition be mitigated by the rehabilitation of the most significant historic components and structures at the mill site. Those components and structures should be identified through consultation with the King County Historic Preservation Office, the Department of Archaeology & Historic Preservation, and the Washington Trust for Historic Preservation. 12-4

Thank you for the opportunity to comment on this signifant historic site. Please feel free to contact me at any time at jmortensen@preservewa.org or 206-462-2999.

Sincerely,

Jennifer Mortensen
Outreach Director

CC: Jennifer Meisner, King County Historic Preservation Office
Greg Griffith, Department of Archaeology & Historic Preservation

Letter No. 13A

Mark Hofman

From: Karen Yoshitomi <kareny@jcccw.org>
Sent: Friday, July 10, 2020 7:00 PM
To: Shared Mill Site EIS
Subject: Comments - DEIS
Attachments: IMG_20200710_0001.pdf

Categories: Green category

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JUL 10 2020
City of Snoqualmie
Community Development Department

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Dear Mr. Hoffman,

Please find attached, my formal comments with regard to the DEIS.

Thank you for the opportunity to submit.

Sincerely,

--
Karen Yoshitomi
Executive Director
Japanese Cultural & Community Center of Washington
1414 South Weller Street | Seattle, WA 98144
t 206.568.7114 ext. 107 | e KarenY@jcccw.org
jcccw.org | Facebook | Twitter

JAPANESE CULTURAL & COMMUNITY CENTER of WASHINGTON

July 10, 2020

Re: Snoqualmie Mill Planned Commercial/Industrial Complex
SEPA Cultural Resources Assessment
DAHP Project No. 2020-01-00740

Attn: Mark Hoffman, Community Development Director
MillSiteEIS@snoqualmiewa.gov

Dear Mr. Hoffman,

Please accept this correspondence as a means to convey to the appropriate City of Snoqualmie officials and the Community Development Department, a formal request and appeal to elevate the review and assessment of the potential adverse impacts to the recovery and analysis of cultural artifacts buried in the portion of the land that included the residential area for the Japanese mill workers and their families from 1918 until their forced departure in 1942, to the Washington State Department of Archeology and Historic Preservation (DAHP). Further consultation and coordination with DAHP should be conducted regardless of whether or not current or future development is planned that will cause subsurface disturbance 6 feet below the grade. Concern over further desecration of the land for the sake of development is paramount, but the historic significance of the history of the Snoqualmie Falls Lumber Company, and the people associated with its remarkable history provide an educational opportunity that is worth preserving and sharing with the public. 13A-1

The findings of the assessment are compelling, but the recommendation that "no further cultural resources investigation prior to the development of Planning Area 1 is necessary" seems shortsighted and flawed. It leaves open the possibility that the cultural artifacts will become inaccessible for research and interpretation. The cultural resources that were uncovered and reburied in the area mapped as the "Japanese Community" is tangible evidence of a piece of history that should be brought to light, not allowed to fade from our consciousness. The contributions of the Japanese to the lumber, railroad and forestry industries in the Snoqualmie area is noteworthy in and of itself, but the forced removal of the Japanese in 1942 from the mill town is even more important from a civil and human rights perspective. A complete record and study of what they were forced to leave behind and the possession they chose to destroy by dropping into the outhouse pits is an important lesson from history that has relevance today. 13A-2

In 1983, the Commission on Wartime Relocation and Internment of Civilians issued findings in a report titled: *Personal Justice Denied,* concluding that the broad historical causes which shaped the decision to exclude and indefinitely detain nearly 120,000 people of Japanese ancestry was due to "race prejudice, war hysteria and a failure of political leadership." What happened to the Snoqualmie Falls mill town Japanese in 1942 should not be forgotten. More importantly, a full archeological survey may provide an educational opportunity and invaluable insight into the long history and impact of institutionalized racism, discrimination, labor relations, immigration and its impact on social structures today.

Sincerely,

Karen Yoshitomi
Executive Director, JCCCW

Letter No. 13B

Mark Hofman

From: David Inoue <dinoue@jacl.org>
Sent: Friday, July 10, 2020 8:09 PM
To: Mark Hofman
Subject: Snoqualmie Mill Development DEIS comments
Attachments: Snoqualmie 10July2020.pdf

Categories: Green category

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JUL 10 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

Please find attached our comments regarding the DEIS study of the Snoqualmie Mill development project. Please do not hesitate to contact me should you have any questions, and please be sure to include JACL in any further announcements or correspondence about the development, particularly in regard to Planning Area 1, the site of the historic Japanese and Japanese American settlement.

David Inoue, MPH/MHA | Executive Director
Japanese American Citizens League
1629 K Street NW, Suite 400, Washington, DC 20006
tel: (202) 223-1240 | mobile: (202) 607-7273 | dinoue@jacl.org

18.01.076
A1

Letter No. 13B

Japanese American Citizens League (JACL)
Headquarters: 1765 Sutter Street, San Francisco, CA 94115 Tel: (415) 921-5225
DC Office: 1629 K Street NW, Suite 400, Washington, DC 20006 Tel: (202) 223-1240
www.jacl.org

July 10, 2020

Mark Hofman
Community Development Director
City of Snoqualmie
MHofman@snoqualmiewa.gov

Dear Mr. Hofman:

TheJapanese American Citizens League (JACL) would like to offer comment on the Draft Environmental Impact Statement (DEIS) for the Mill PCI Plan. As the nation's oldest and largest Asian American civil rights organization with a mission to secure and maintain the civil rights of Japanese Americans and all others who are victimized by injustice and bigotry and to promote cultural, educational and social values and preserve the heritage and legacy of the Japanese American community, we believe we have a distinct and clear interest in the Mill PCI Plan site.

It is without question that the plan site includes area that was once an early Japanese and Japanese American settlement. In fact, significant numbers of Japanese immigrants were brought to this country specifically to work at the mill site and were forcibly removed to American concentration camps during World War II. As a result of that forced removal, the entire community was required to dispose of their possessions and carry only a single suitcase with them. Oral histories of the experience indicate many families disposed of their belongings in the outhouses on the site.

In the DEIS Appendix E: SEPA Cultural Resources Assessment by Cascadia Archaeology, several trenches were dug to identify potential artifacts present in Planning Area 1, where it is understood that the Japanese community resided. Only two trenches were dug within the expected area and a third off grid trench also revealed artifacts. Excavation did reveal the presence of artifacts of potential significance both clearly indicating ownership by residents of the Japanese labor community. 13B-1

Despite the discovery of artifacts, there was no further effort to determine the extent of the artifacts present in the existing trenches, nor were additional trenches dug to assess the extent of how large the community may have spread in the area.

We find it especially concerning that there is no recommendation to conduct further excavation and development be allowed to proceed on the surface of the land over which the community was likely located.

The Snoqualmie site is of vital historic significance to our Japanese American community and to the historical context of our nation at a time when under the guise of national security, blatant racism was allowed to disrupt and wipe out an entire community. A community further representative of the rich history of immigration, and workers coming to our country in search of opportunity in the face of both the need of workers, yet the racism and xenophobia that kept them segregated from the rest of the town. This is a story worthy of preservation and which needs to be further investigated. Further excavation and study of the Snoqualmie site will help to paint the picture more fully.

We urge you to perform your true due diligence to fully assess the site within planning area 1 for evidence of the past community. Only a full excavation that has the potential to reveal so much about the community that was suddenly uprooted and forced to leave so many belongings that are likely still there buried beneath the burned ruins of their homes. 13B-1

If development is allowed to proceed without further assessment, the opportunity to gain this knowledge will likely be lost so long as the development is in place covering the site, and even worse, could destroy permanently invaluable remnants of the past.

As an interested party, JACL requests that we be notified of any further developments in the process of assessing the site and related to the archaeological assessments of the property. We were fortunate to have been informed of this report through third party interested individuals.

As our nation, in this time, strives to better understand the narrative of marginalized communities, we hope that our history will not be erased in the interest of economic development. Thank you for your attention and consideration. We look forward to working with you to ensure the Snoqualmie site is properly assessed and excavated to preserve the history and story of some of the first Japanese and Japanese American settlers to the area.

Sincerely,

David Inoue
Executive Director

Letter No. 14

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Development Department

From: Cynthia Krass <cynthia@svpa.us>
Sent: Friday, July 10, 2020 8:55 PM
To: Mark Hofman
Cc: pmcglothlin@lydig.com
Subject: SVPA public comment letter Snoqualmie Mill PCI DEIS
Attachments: SVPA Public Comment Snoqualmie Mill DEIS July 10 2020.pdf

Categories: Green category

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Good evening Mr. Hofman:

Please accept the attached comment from the Snoqualmie Valley Preservation Alliance on the DEIS for the Snoqualmie Mill PCI. Please do not hesitate to contact me or Board Chair Patrick McGlothlin with any questions or comments.

Cynthia Krass
Executive Director
Snoqualmie Valley Preservation Alliance

July 10, 2020

Mark Hofman, SEPA Responsible Official
City of Snoqualmie
38624 SE River Street
Snoqualmie, WA 98065
mhofman@snoqualmiewa.gov

Sent via e-mail

Dear Mr. Hofman:

On behalf of myself individually and the Snoqualmie Valley Preservation Alliance ("SVPA") and its members collectively in my capacity as its Chair, please accept these comments on the April 2020 Draft Environmental Impact Statement ("DEIS") the City of Snoqualmie ("City") issued in connection with the proposed Snoqualmie Mill Planned Commercial Industrial ("PCI") Plan ("Proposal"). To facilitate your consideration of and effective response to each of our comments, they are broken down into five major categories under Subheadings A-E, below.

A. The Analysis in the DEIS and PCI Plan Proposal Are Based on, and Perpetuate, a Violation of Applicable Comprehensive Plan Requirements for Floodplain Management and Fail to Account for Other Legal Violations related to Unpermitted Fill on the Site.

The DEIS identifies one of the major issues associated with the Proposed PCI Plan as the "potential impacts of redevelopment on flooding." DEIS at 1-7. In addition, the applicant has identified two of its objectives of the Proposal as "to provide area for flood storage" and to implement applicable City policies for, among other things, floodplain management. DEIS at 1-2. Moreover, the City's Scoping Letter further included within the series of major concerns that were identified during the scoping process for the Proposal the "concern over risk of flooding" and "flood storage and stormwater runoff."

14-1

This focus and expressed concerns over flooding are well-founded given the fact the PCI Plan Proposal Site lies effectively entirely within the flood plain, and indeed have long been recognized by the City as stemming to a considerable degree from a long history of unpermitted fill that has occurred on the Site. The City succinctly summarized this history in discussing the City's then-prospective annexation of the Site from King County in the 2009 Snoqualmie Vicinity Comprehensive Plan, as follows (emphasis supplied):

> The owner of the Weyerhaeuser Mill site has constructed a berm along and perpendicular

> to Mill Pond Road, and placed fill behind the berm, without appropriate permits. Preliminary surveys indicate that approximately 93,929 cubic yards of fill were added within this regulated flood hazard area. The King County Flood Hazard Reduction Plan identifies the tall earth berm as a known flood hazard, which violates federal floodplain management regulations. This floodplain encroachment diverts floodwater into the City, prevents high velocity flows from occurring within this stretch, and adversely impacts flood conveyance and storage capacity. A current grading permit was issued to voluntarily remove approximately 49,000 cubic yards of added fill. *However, this would only partially restore the floodplain to pre-fill topographic elevations utilized in the City's initial Flood Insurance Study.* Additionally, potential ground contamination may have occurred from previous uses associated with the lumber mill operations.

To redress this unpermitted fill and remediate its deleterious impacts, the City adopted a number of policies related to annexation of the Site, one of which is to "[r]equire removal of the floodway and floodplain encroachment (fill) as a condition of annexation to assure restoration of the pre-fill floodplain functions." 2009 Comp Plan Policy 8.C.3.4. Another of these policies provides that, "[u]ntil a long-term solution to preventing flood damages in the City of Snoqualmie is agreed to by King County and the City, support annexation of the Mill Planning Area only when consistent with all appropriate policies herein." In the same vein, a third policy further "[r]equire[d] an annexation proposal to include an independent survey to quantify the initial topographic elevations used in the City's 1984 Flood Insurance Study as the community's base flood elevation, and the current floodplain elevations created by the mill site berm and sortyard fill." Finally, the City imposed a requirement that consistency with floodplain policies be prescribed as a critical element of the applicable annexation implementation plan. Policy 8.B.4 ("Maintain effective control over growth and development in the 100-year floodplain within the urban growth area and ensure consistency with Comprehensive Plan goals and policies in the annexation implementation plan prepared for such areas"). 14-1

The City's own actions confirm that it believes these are important policies to be fully complied with and implemented. The City went so far as to file a code enforcement complaint with King County's Department of Development and Environmental Services for unlawful filling, primarily the Mill Pond Road berm, and pursued it vigorously for multiple years. SVPA acknowledges that the City's challenge ultimately was dismissed in 2003, but this did not change the City's Comprehensive Plan policies in this regard, which indeed remained in the plan for more than a decade since that time and were in effect at the time the Site was annexed to the City in 2012.

Moreover, the City doubled down on its commitment to comply with these flood-related policies in responding to a challenge brought to the Pre-Annexation Agreement into which it entered with the Applicant and others that called for deferring preparation of an Annexation Implementation Plan until after annexation of the Site occurred, notwithstanding a requirement in the 2009 Comprehensive Plan requiring that such a plan be prepared, reviewed, and approved prior to any such annexations (Policy 8.B.2.1). Indeed, in an order the Growth Management Hearings Board issued in that challenge, *Your Snoqualmie Valley v. City of Snoqualmie,* Case No. 11-3-0012, the Board explicitly noted that "[t]he City argues the Pre-Annexation Agreement does not ignore or

abandon application of the annexation policies but simply defers them until actual development is proposed." In this same vein, the Board went on to find that many of the specific requirements prescribed by the relevant annexation policies "have already been resolved," including "agreement on flood control measures." In support of this finding, the Board cites in a supporting footnote 2009 Comprehensive Plan Policies 8.C.3.3 and 8.C.3.8, the latter of which, as noted above, calls for ensuring annexation of the Site occurs "only when consistent with all appropriate policies herein," which of course include Policies 8.C.3.4 and 8.C.3.3, referenced above. As a result, the City agreed to ensure consistency with these policies, including the one "[r]equir[ing] removal of the floodway and floodplain encroachment (fill) *as a condition of annexation* to assure restoration of the pre-fill floodplain functions" in Policy 8.C.3.4 (emphasis supplied).

But a review of the record shows that neither the Pre-Annexation Agreement, the City's Ordinance 1098 approving Annexation of the Site, nor the Post-Annexation Implementation Agreement include a requirement that would comply with 2009 Comprehensive Plan Policy 8.C.3.4. SVPA recognizes, of course, that the City adopted a new Comprehensive Plan in December 2014, Snoqualmie 2032. But this cannot and did not serve to negate or vitiate the requirement in Policy 8.C.3.4 for at least two primary reasons. First, because that Policy imposes a condition on annexation of the Site, the relevant plan is the one that was in effect on the date the Site was actually annexed, at which time the 2009 Comprehensive Plan was still in effect. Second, as described above, the City independently agreed to and represented to the Growth Management Hearings Board that it would comply with the flood-risk policies in its 2009 Comprehensive Plan, a commitment on which the Board relied in rendering its decision in the administrative appeal in question and therefore which persists independent of any changes that have been made to the plan itself. 14-1

Nevertheless, none of these explicit floodplain policies in the City's 2009 Comprehensive Plan, were complied with at the time of annexation of the Site in 2012, nor has the City explained how they have been complied with since that time, in the DEIS or otherwise. Notwithstanding its representations to the Growth Management Hearings Board not to "abandon" these policies by allowing the postponement of the Annexation Implementation Plan until after annexation, this is precisely what has happened. Without seeking to ascribe any ill will or improper motives, the City's machinations to this point have effectively amounted to a "shell game" on the issue of unpermitted fill and ensuring that its own policies on unacceptable flood impacts would be satisfied. This is a major oversight and gap that needs to be rectified in the FEIS, and serves to infect much of the analysis in the DEIS, as described in other sections of these comments, below. As just one example, as described in the section immediately below, the EIS needs to consider an alternative reflective of and predicated on full compliance with the City's own policies.

A. The Range of Alternatives in the DEIS is Unacceptably Narrow and, at a Minimum, Needs to Consider an Alternative Consistent with the City's Commitments and Policies to Provide for Removal of Unpermitted Fill in the Floodplain to Reduce Flood Risks. 14-2

SEPA requires an EIS to include a detailed discussion of alternatives to the proposed action. RCW 43.21C.030(c)(iii). This statutory requirement is fleshed out in regulations that have been promulgated that direct how public entities are to comply with SEPA's requirements for an EIS,

including the one prescribing that it contain a discussion of alternatives. More specifically, these regulations provide that "[a]n EIS shall . . . inform decisionmakers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality." WAC 197-11-400. The alternatives to receive detailed consideration in an EIS must also "include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197–11–440(5)(b). Moreover, one of SEPA's explicit purposes calls on analyses carried out pursuant to its terms to identify and evaluate "reasonable alternatives that would mitigate adverse effects of proposed actions on the environment." WAC 197–11–030(g). And the City recognized its duty in this regard by stating in its own Scoping Notice that it was committed to using the alternatives in its EIS "to demonstrate potential 'real-world' trade-offs among project elements and outcomes, not a straw man scenario."

The DEIS's discussion of alternatives fails to satisfy these statutory and regulatory requirements, as well as the City's commitment with respect to the alternatives it would consider to the PCI Proposal, for several principal reasons.

First, the DEIS evaluates only two "action alternatives" between which there is no meaningful distinction among environmental effects in the vast majority of categories of the most significant resources and values at issue. Indeed, even a quick review of the primary sections discussing the environmental effects on various values and resources concedes that they are virtually the same or extremely similar in almost all instances. See, e.g., DEIS at 1-11 & 3-21 (effects on Earth Resources "substantially the same"); 1-13 (effects on Air Quality & GHG "generally the same" or "similar"); 1-15 (effects on Water Resources "similar"); 1-17 (effects on Plants and Animals "mostly the same level and type"); 1-20 (effects on Environmental Health "generally the same"). Perhaps this is not surprising, as the DEIS concedes that the "Redevelopment Alternative" reflects simply a minor variation of the PCI Plan Proposal itself, differing only on its "land use mix and emphasis," and indeed, features an outdoor performance venue just as the original version of the PCIP Plan did. DEIS at 1-6. Indeed, even the square footages for the different land use mixes do not differ substantially. Compare DEIS at 2 16 (Exh. 2.3-2) with DEIS at 2-40 (Exh. 2.3-13). Indeed, the only real differences the DEIS identifies between the two action alternatives relate to "noise and light, ' due to the outdoor performance venue in the Redevelopment Alternative, and traffic and population growth. Notably, these reflect only two of the ten major issues identified in the DEIS, and do not implicate any issues related to flood risk or floodplain management. DEIS at 1-7 – 1-8. 14-2

Second, the overly narrow scope of alternatives evaluated in the DEIS is further reflected by the fact that the document concedes that the only other action alternative it considered merely "articulates a theoretically possible development scenario, [and] is not a plan that is proposed or desired by the applicant." DEIS at 1-6. But this largely defeats the purpose of having another action alternative because the SEPA regulations state that they are to reflect options that present real trade-offs for the decisionmaker and would still allow for accomplishment of the proposal's objectives. By doing neither, and also projected to have virtually the same degree and type of environmental effects, the Redevelopment Alternative amounts to a papering over of the requirement to have a meaningful discussion of alternatives in an EIS that falls well short of satisfying that duty. See WAC 197-11-402(10).

Third, a related error in the DEIS in this regard is its failure to state a purpose of the proposed action. Indeed, in that section of the DEIS, one will search in va n for any description of the Proposal's purpose, but simply find a description of the Proposal itself. This further supports the concern that the DEIS's purpose is designed to justify a largely reordained outcome, namely adoption of the Proposal, without he meaningful analysis of trade-offs related to potential environmental effects that SEPA requires and the decisionmaker and public are entitled to.

Fourth, SVPA formally proposes a specific alternative that it believes warrants (and is entitled to under SEPA) detailed consideration in the EIS that is consistent with and predicated on full compliance with the City's own 2009 Comprehensive Plan po icies regarding floodplain management and flood risk. As such, the alternative would therefore at a minimum require the
1 emoval of all unpermitted fill as a precondition to approval of the PCIP, and also make satisfaction of that condition the baseline against which compensatory flood storage for any additional fill prescribed by the Plan would need to be evaluated. More specifically, and to clarify, this alternative would not need to differ at all from the Proposal in the DEIS in terms of the land uses or development footprint, or in any other particular except for the manner in which the unpermitted fill that the City has itself determined should have been removed as a condition to taking the earlier necessary step in the process of developing the Site of Annexation.

Consideration of such an alternative is required under SEPA and serve its underlying policies for several important reasons. It would actually enable the City to make an informed tradeoff between the additional costs required o implement its own policies and the beneficial environmental and resource e cts that would result from requiring such compliance. In addition, such an alternative would unquestionably meet the Proposal's objectives because, as explained above, it i not aim d at chan ing the build-out or composition of the constituent elements of the proposed PCIP but rather at ensuring the ongoing and illegal legacy impacts of unpermitted fill on the Site are finally and appropriately addressed, which again, even the City's
c wn policies have prescribed hould have occurred either prior to, or as a necessary precondition of, Annexation. Finally, consideration of uch an alternative in detail would rely on a true and legally proper baseline and not inappropriately allow the practice of effectively "double-counting" that serves to undermine the validity of the flooding-related impact analysis in the DEIS whereby any removal of remaining unpermitted fill on the Site apparently is being relied upon as a basis for taking credit in compensating for the effects of the additional fill called for under both the Proposal and Redevelopment Alternative, even though such removal was already a legal prerequisite to Annexation and any subsequent development to occur on the Site.

14-2

In sum, SVPA believes considering such an alternative would go a long way to redressing the unacceptably narrow scope of á ternatives reflected in the DEIS, as outlined above. In this regard, we would welcome the opportunity to discuss this and similar alternatives with the City and Applicant so as to ensure mprovement of flood risk and the adverse effects of flooding for all potentially affected residents in the Basin to the maximum extent possible, and at a minimum consistent with the City's pre iously expressed policies, particularly in light of the long history o flooding in he Basin. SVPA woul d á s be pleased to provide whatever assistance we can to ensure houghtful consideration ofm ean'g ful alternatives including the one we recommend in
t hese comments prior t a final decisi n being made on the PCI Plan Proposal.

B. The DEIS Contains an Inadequate, Overly Narrow, and Insufficiently Substantiated and Detailed Analysis of Flooding Risks and Impacts, Particularly in the Context of Downstream Effects and the Well-Established History of Flooding in the Basin.

The DEIS contains various discussions of flood risk and flood-related impacts. DEIS at 3-57 – 3-60 & 3-80 – 3-84, & 3-85 – 3-86. For the reasons described below, however, none of these discussions satisfies its duties under SEPA and major changes need to be made in the City's analyses in the FEIS for it to be able to redress each of these critical problems.

First, the scope of the analysis of potential flooding impacts is decidedly too narrow by focusing on what it identifies as the "regional hydrology setting of the site" that extends only slightly below Snoqualmie Falls. DEIS at 3-57 & 3-58, & Exh. 3.3-5. Flooding needs to be analyzed on an appropriate basinwide scale and encompass all potentially affected areas, not just the immediate vicinity of the Site itself, and such effects also need to be evaluated through the prism of the various metrics and against the regulatory standards applicable within potentially affected jurisdictions. As an example in this regard, flooding impacts need to be evaluated against the King County floodplain regulatory standards that allow for it to have the highest flood insurance rating in addition to the City's quite different standards. This is especially the case when non-City residents are expected to bear a large proportion of the flooding-related impacts of the Proposal, as discussed below.

In addition, even within the overly narrow regional hydrologic context on which the DEIS focuses its flood-related impact analysis, numerous gaps and deficiencies exist. For one thing, the analysis relies on an improper baseline. More specifically, the King County Surface Water Design Manual ("KCSWDM"), on which the DEIS indicates its analysis is predicated in part, DEIS at 3-45 defines Existing Site Conditions as "those that existed prior to May 1979 (when King County first required flow control facilities) as determined from aerial photographs and, if necessary, knowledge of individuals familiar with the area, unless a drainage plan for land cover changes has been approved by the County since May 1979 as part of a development permit or approval.' Thi definition is nowhere referenced or analyzed in the DEIS, and needs to be addressed in the FEIS. Nor is there any explicit analysis or explanation of compensatory storage at same or similar elevation zones. This is a critical element of any analysis in this regard in order to properly evaluate effects and has been done for other sites in the area. For example, see the Preliminary Grading & Drainage for Preliminary Plat of Tolt River Terrace (Jan. 17, 2020). 14-3

Along the same lines, the analysi further needs a description and explanation of the basis of the assumption it makes about elevations used to determine and calculate compensation storage elevation levels (DEIS at 3-80). An explanation for how Base Flood Elevation (BFE) was determined (D IS at 3-80) needs to be 'ncluded as well and, at a minimum, it needs to account for the historic and unpermitted and ille al fill on the Site. Finally, the analysis of flooding in the immediate vicinity of the Site ignores second-order and indirect impacts on flooding by forgoing any meaningful analysi of how the effects of development on groundwater will affect associated baseflows in Tokul Creek and Snoqualmie River.

Moreover, even to the extent the DEIS looks beyond its overly constrained "regional hydrology," the analysis has erious flaws in need of correction. Most glaringly, the DEIS includes a wholly

superseded version of the King County website's description of the results of the Hydrologic (Phase 2) Study it sponsored in 2018 to evaluate changes in hydrology and the resultant effects on flooding in the Snoqualmie River Basin based on a broad investigation into annual and seasonal trends in the Basin's hydrology arising from a variety of different potential causes. The current and correct version of that summary actually provides as follows (emphases supplied):

> The Phase 2 Study found evidence that *substantiates some of the reports that flooding has gotten worse in the Snoqualmie Basin*. The following changes in flooding were detected:
>
> *Small and moderate flood events appear to be occurring more often* at several gages in the basin.
>
> *There are increasing trends in fall and spring high flows. This corroborates residents' observations that spring and fall flooding has become more severe*.
>
> These trends are consistent with observed changes in precipitation patterns at several nearby weather stations, as well as climate change projections for the Pacific Northwest. Forestry, land development, and sedimentation were found to have a relatively minor effect on large flood events in the Snoqualmie Valley.
>
> The analysis also revealed the complexity and variability of flood behavior in the Snoqualmie, and concluded that much of the change in flooding reported by residents may be attributed to the unique characteristics of each flood event.

https://www.kingcounty.gov/depts/dnrp/wlr/sections-programs/river-floodplain-section/capital-projects/snoqualmie-hydraulic-hydrologic-study.aspx (last referenced July 10, 2020)(emphases supplied). 14-3

This is a distinction with a substantial difference. The version in the DEIS on which its extremely cursory reference to "flooding impacts on downstream properties" is based states that the Phase 2 study "did not find that flooding has gotten significantly worse in the Snoqualmie Basin" and only found "some evidence" of increasing frequency of flood events and upward trends in high flows. DEIS at 3-48 – 3-49. This error is particularly noteworthy because it is contained in the only discussion in the DEIS in its hundreds of pages that discusses downstream flooding impacts. Nor there is no specific analysis of the underlying Hydrologic Study itself even though it was completed just a little more than two years ago and had as its two primary purposes "to determine the extent to which flood hydrology has changed over time and to investigate contributing factors at a level of detail sufficient for King County, in consultation with stakeholders, to prioritize further analysis and basin-related actions." The Hydrologic Study goes on to say that its analyses are designed to "provide a foundation for future planning efforts in the basin," such as the very PCI Plan Proposal process in which the City is currently engaged.

The DEIS also only offers the most cursory summary of King County of the Hydraulic (Phase 1) study it prepared in 2016 to evaluate the downstream impacts of two large flood reduction projects constructed just upstream of Snoqualmie Falls between 2004 and 2012 (Army Corps 205 project and PSE Snoqualmie Falls project) even though it expressly references both of them. DEIS at 3-48. The result of this short-shrift provided to the Phase 1 study is that the DEIS limits its analysis of the downstream effects to a

single sentence and metric (peak 100-year water level), even though it concedes that the projects resulted in an increase in that level. DEIS at 3-48. The study itself, however, found more broadly that the projects served to "generally increase downstream flows and water levels on the rising limb of the flood (i.e., the time period during which discharge, or flow, at the point of measurement is increasing)," and importantly, broke down the downstream flooding impacts based on the respective severity of the flood and particular locations along the river, variables the DEIS does not acknowledge, let alone evaluate. This is particularly salient because it appears that the City is relying in part on the fact that the projects were designed to reduce flood risks and impacts at its location upstream of the Falls, which the study in fact found was the result of their mplementation.

In addition, and particularly in light of the updated summary of the relevant analysis King County has undertaken, SVPA is committed to addressing the fact that flooding is getting worse in the Snoqualmie Basin and insuring that the duty to address cumulative effects related to flooding are addressed in this or any other EIS in which flooding impacts are a major issue. There is simply no basis for implying, as the DEIS effectively does, that downstream residents in the Lower Snoqualmie Valley would not continue to suffer greater and increasing flood risks under adoption of the Proposal that, in its current form, appears to be aimed at doing nothing more than preserving the status quo when it comes to dealing with such risks for citizens in the Basin. *See* DEIS at 3-176 (stating generally that flood impacts will be reduced as a result of the PCI Plan). This is particularly true given the ongoing implications of climate change related to such risks. Even though the DEIS devotes an entire section to "Air Quality and Greenhouse Gases" (Section 3.2)(DEIS at 3-29 3 44), that section only addresses projected GHG emissions expected to result from each of the alternatives, but does not address how climate change, with or without the Proposal, is likely to affect any of the other resources or issues it addresses, inc uding flooding. This is a major oversight, particularly where the King County Flood Control District study referenced above determined that the upward trends in flooding and higher flow in the Basin are consistent with and likely at least a part a function of climate change projections or the region. There is abundant evidence, scientific bases, and recent studies, including those undertaken by the Climate Impacts Group at the University of Washington, indicatin that hydrological patterns in the region's waterways will continue to be dramatically affected in ways that directly relate to flood risk. In this context, the complete failure to address this factor in the DEIS, particularly in the context of analyzing potential flooding impacts, is a significant oversight and renders the analysis in the document deficient on its face on this basis alone.

14-3

A related gap in the analysis in the DEIS albeit in a different context is a failure to discu s the equities of a Proposal under which the City will receive the vast majority of the socioeconomic benefits of development of the Site, while downstream residents in the Basin will largely have to bear the flooding-related brunt of its failure to appropriately and adequately redress improper unpermitted fill in the floodplain as part of its decision-making process. In this and all of the other ways in which the DEIS neglects to adequately address downstream flooding impacts are also flatly inconsistent with SEPA regulations providing that, "[i]n assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to hose aspects within its jurisdiction, including local or state boundaries." WAC 197-11-060 4)(b).

C. In Large Measure Because It Defers So Much of Its Analysis until Later Stages of Decision-Making, Processes, or Analysis, the DEIS Fails to Adequately Address Cumulative Effects & Will therefore Almost Assuredly Need to Be Supplemented At Least Once if not Multiple Times.

SEPA regulations expressly require an EIS to analyze "direct, indirect, *and cumulative* impacts." WAC 197 11–060(4)(emphasis supplied). In addition, such regulations also address the need for the preparer of an EIS to secure or obtain information on significant adverse impacts if it is essential to a reasoned choice among alternatives and the costs of acquiring it are not exorbitant. WAC 197-11-080. In addition, a principal policy objective of SEPA is for the preparer of an EIS to "[i]ntegrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively. WAC 197-11-030(e). The DEIS runs afoul of and/or against the grain of each of these regulations insofar as it contains inadequate cumulative impact analyses and defers much of the necessary analyses essential to an informed choice among alternatives to latter phases or processes, especially in the context of addressing flooding-related impacts and in particular in the context of downstream impacts and risks.

Just a handful of examples of the many evaluative measures and additional regulatory and analytical requirements that are being deferred with little more than vague assurances offered that due compliance will be achieved at the proper time suffice to reveal that a meaningful cumulative impact analysis is as a practical matter virtually not feasible in the DEIS in a manner that complies with SEPA regulations. One of the most glaring examples in this regard is the decision to delay application for the required Flood Improvement Permit (DEIS at 3-59) and the associated Biological Evaluation and Floodplain Habitat Assessment (DEIS at 3-131) that must be prepared to analyze potential impacts to listed species from site-disturbing activities under the Proposal within the floodplain, which as the DEIS concedes in which virtually all of the PCI Plan Site exists. DEIS at 3-57 & 3-177. The DEIS states that this critical step is being put off until *after* approval of the PCI Plan, but SVPA is concerned that this will undermine the ability of the City to have critical information about flooding impacts before it at the time it makes the decision as to whether to approve the Plan. Instead, all the DEIS offers is a vague and wholly conclusory assurance that analysis eventually will be done that "will ensure there is no increase in the floodplain, or flood levels during the base flood" and comply with both the relevant Federal Emergency Management Agency ("FEMA") regulations in Title 44 of the Code of Federal Regulations and the applicable chapters of the Snoqualmie Municipal Code (chapters 15.12 and 19.12). DEIS at 3-59. This analysis, however, will need to contain many of the very types of environmental effects that are essential to an adequate cumulative impact analysis of the PCI Plan and a reasoned choice by the City on whether to adopt it and, more particularly, what final form it should take, rather than taking a piecemeal, overly segmented approach that defers key analysis until later stages of the process. 14-4

Other examples in this vein include: hydrologic modeling using Ecology's Western Washington Hydrologic Model is to be conducted at time of permitting of each Planning Area (DEIS at 3-64); analysis & design to maintain balance of surface water hydrology for wetlands not primarily supported by shallow aquifer for planning areas 2 & 3 are to occur at the time of future permitting and supplemental environmental review (DEIS at 3-76); design parameters of

stormwater wetlands are to be provided in form of tracking matrix to relate PGIS to stormwater facilities by tributary area will be developed during design and permitting of first mass grade plan for PA1. In addition, concerns over the lack of an adequate cumulative impact analysis for various resources and issues also arise from the multiple times in the DEIS where the analysis indicates that only the effects of Planning Area 1 are being considered at this stage and that a similar analysis of effects associated with Planning Areas 2 and 3 will need to await later phases of the development process for the Site. See, e.g., DEIS at 3-80 3-81 (noting that evaluations of the no-net rise analysis for planning areas 2 & 3 will not be conducted until more detailed site plans are available). Although somewhat understandable on a pragmatic level, the City still needs to ensure that an adequate and properly detailed cumulative impact analysis is conducted related to effects from all three Planning Areas, and that this segmentation does not effectively preclude that from ever occurring in connection with the Proposal, particularly prior to a decision on its final configuration and prospective approval.

At a minimum, SVPA believes it will be essential for the City to supplement the DEIS and circulate a supplemental DEIS for public input upon provision of further detail. Such supplementation will be particularly warranted based on two further steps in the process. The first of these is the consultation for likely adverse effects to listed species arising from the PCI Plan that the DEIS acknowledges will be required under the Endangered Species Act, either on FEMA Floodplain Habitat Assessment, permitting for the stormwater outfall for Planning Area 1, and/or in connection with a permit for impacts to the jurisdictional wetlands on the site under Section 404 of the Clean Water Act. Such supplemental analysis consistent with SEPA will be especially important at this phase given the requirement that consultation must consider the comprehensive scope of impacts related to development called for under the PCI Plan. 50 CFR § 402.02 (definition of "Effects of the Action" and "Cumulative effects" for purposes of ESA). In this same vein, the DEIS clearly contains insufficient information and analysis to support its conclusion that the development called for under the PCIP will be "not likely to adversely affect any ESA-listed species at this time (DEIS at 3-99 – 3-103 & 3-131 – 3-132). 14-4

The other key step in the foreseeable future that will trigger the need for supplemental SEPA analysis and opportunities for additional public review and comment is when the applicant submits its proposed development agreement and a revised PCI Plan application that the DEIS indicates it intends to do in conjunction with the FEIS. DEIS at 2-3 – 2-4. Supplementation will very likely be required at this step because of the important details that will be fleshed out and nailed down in the agreement and potentially significant new information related to important environmental effects that will be reflected in the revised application.

D. The DEIS also Contains Additional Flaws, Gaps, & SEPA Violations that Will Need to Be Remedied in The FEIS as Specified under Each of the Respective Bullets Below.

• Aquifer Recharge

The DEIS addresses potential effects to groundwater from the Proposal. DEIS at 3-75 3-76. There are at least three issues arising from its discussion as to such effects that need additional detail, explanation, and/or justification, as described below. 14-5

First, in coming to its conclusions about potential effects or reductions to aquifer levels in the area, the DEIS notes that results of ongoing groundwater level monitoring at the Snoqualmie Ridge development serve as a useful analogue to the Snoqualmie Mill site for purposes of aquifer recharge (DEIS at 3-75 – 3-76), without offering any explanation or justification for the grounds for this assumption. Such a discussion is particularly important given that Snoqualmie Ridge is located at a much higher elevation than the PCIP and has a significantly different hydrogeologic setting and connection with the floodplain.

Second, the DEIS notes as follows: "*Development has the potential to change the amount of surface water and groundwater recharge. Clearing vegetation and replacing it with suburban landscaping (such as lawns) reduces evapotranspiration, increasing the amount of water available for groundwater recharge and runoff. Depending upon how stormwater is managed the increase in groundwater recharge may be counteracted by an increase in impervious surfaces (building and pavement areas), and other factors.*" DEIS at 3-75. What this statement fails to recognize is the well-known principle that development changes the amount and timing of surface water run-off and associated groundwater recharge. Clearing native vegetation and replacing it with landscaping rarely reduces net evapotranspiration and more commonly increases run-off (which decreases groundwater recharge). "Counteracting" increased recharge with impervious surface is rarely a design objective in land development. As a result, substantially more analysis is needed in the EIS to reveal whether and how development will change the timing of water available for recharge, particularly changes resulting from increasing the direct discharge of storm events into the Snoqualmie River, as opposed to storing the volume of such discharges in the wetlands on or near the Site. 14-5

Finally, the DEIS make use of the term, "hyporheic zone," and conflates it with its discussion of regional groundwater flow and recharge areas in upland areas, DEIS at 3-118, without reflecting or acknowledging that these are distinctly different processes. This confusion and conflation of distinct concepts needs to be addressed correctly in the FEIS.

• Surface Water Features

In addressing surface water features, the DEIS offers no discussion of Tokul Creek or current low flows, or how groundwater impacts could affect such flows. This oversight is particularly material given that Tokul Creek supports a WDFW fish hatchery and is habitat for Federally Listed Endangered salmonid species. Groundwater baseflow is critical to these species. 14-6

• Water Supply

The DEIS states that the *"City has over-committed, or has over-allocated water service to planned development projects by approximately 152 ERU's over developed source capacity an must implement one of more measures to increase capacity"* At the same time, however, there i no discussion of the viability or likelihood of success for any of the measures described. Such a discussion should also be included in an alternatives analysis. 14-7

• Violation of State Growth Management Act

The State Growth Management Act makes the City's comprehensive plan "the legal foundation and guide for all subsequent planning and zoning in a city, which in turn must be consistent with, and implement, the Plan." 2032 Comp Plan at 1-6. For the reasons set forth above showing how the PCI Plan Proposal violates several Comprehensive Plan policies related to the removal of all unpermitted fill material on the Site as a condition to its development, the Proposal also violates this statute as well. 14-8

• Inadequate Discussion to Ensure Compliance with MTCA & Other Regulatory Requirements

In Section 3.5, the DEIS purports to show how the PCI Plan Proposal will ensure compliance with the State Model Toxics Control Act ("MTCA"). Several flaws undermine the validity of this analysis, however. For one thing, the scope of the Farallon study the DEIS cites (DEIS at 3-139) for Area 1 was merely to identify potential sources of contamination in Area 1 based on database research and there was no technical review or analysis of actual soil and water quality data, or evaluation of potential transport of contaminants from Areas 2 and 3. Farallon provides a clear disclaimer in its report on the accuracy of their analysis and notes that they *"cannot and does not warrant or guarantee that Planning Area 1 is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future.* But the DEIS goes on to acknowledge (DEIS at 3-141) that clean-up in Areas 2 and 3 did not achieve MTCA clean-up levels and also concedes that some parts of these areas were not even investigated. There is no technical rationale for concluding that transport of hazardous substances has not occurred or will not occur in the future from Areas 2 or 3 to Area 1. Further analysis of potential soil and groundwater contamination in Area 1 is required to ensure adequate analysis of this issue in the EIS pursuant to SEPA. 14-9

Furthermore, the DEIS also indicates that the initial Area 1 investigation showed that *"No public water supply wells were identified proximate to Planning Area 1."* DEIS at 3-139. The City of Snoqualmie s wellfield is now located 1,000 feet north of Area 1, yet no mention or analysis of potential impacts to the City water supply are considered. This is a flaw that must be remedied in the FEIS. 14-10

In like fashion, the DEIS offers only the va uest and most cursory discussions to address the PCI Plan Proposal's consistency with the Snoqualmie Municipal Code when it comes to development within hannel Migration Zones (SMC 19.12.140) (DEIS at 3-16, 3-176, 3-192 3-193). For example, the DEIS acknowledges that the proposed relocation of SE Mill Pond Road and drainage discharge improvements lie within a Moderate Channel Migration Zone that are not generally allowed unless no feasible alternative exists. DEIS at 3-19 & 3-176. But the DEIS does not appear to include any analysis to establish that such is the case, leaving a critical gap in its analysis of compliance with the Code in this respect. 14-11

Thank you for your consideration of our comments. As referenced above, SVPA stands by ready to work with the City to answer any questions you have about them and to lend any assistance it can to ensure their thoughtful and meaningful evaluation consistent with SEPA, as well as to

help improve the alternatives under consideration so as to mitigate their adverse environmental effects to the maximum extent practicable, particularly in the context of flood impacts and risk.

Sincerely,



Patrick McGlothlin
Board Chair, SVPA

Letter No. 15

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Snoqualmie Action <snoqualmieaction@gmail.com>
Sent: Friday, July 10, 2020 10:21 PM
To: Mark Hofman; Shared Mill Site EIS
Cc: Bob Sterbank
Subject: SCAN comments re: Snoqualmie Mill DEIS
Attachments: SCAN DEIS Comment Cover Letter.docx; A. Supplemental DEIS Comments.docx; B. Supplemental DEIS comments pt. 2.docx

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Hofman,

Attached you will find a collection of materials prepared by and for the Snoqualmie Community Action Network (SCAN) in response to the draft environmental impact statement for the proposed PCIP at the Snoqualmie Mill property. All of these materials should be included in the formal public record of comments on the DEIS.

This materials should be reviewed in the following order:

1. Cover Letter (word doc)
2. Letter from David Bricklin, attorney (Google Drive attachment)
3. Letter from Gary Norris, traffic engineer (Google Drive attachment)
4. Letter from Pam Jenkins, toxicologist (Google Drive attachment)
5. Letter from Sarah Cooke, wetlands specialist (Google Drive attachment)
6. A. Supplemental DEIS Comments (word doc)
7. B. Supplemental DEIS Comments pt. 2 (word doc)

By my watch, it is 10:20pm on Friday, July 10th, 2020.

Please respond to this email as a receipt of delivery.

If your reviewers have any trouble accessing any of these documents, please alert me as soon as possible so that I can ensure that you are able to review them fully and properly.

Thank you,

Dana Hubanks
President & Co-Founder
Snoqualmie Community Action Network
snoqualmieaction@gmail.com

PES (Pam Jenkins) Comments - SnoqMillSite DEIS.pdf

Snoqualmie Community Action Network (SCAN)
snoqualmieaction@gmail.com

July 10th, 2020

EMAIL: mhofman@snoqualmiewa.gov

City of Snoqualmie
Community Development Department
ATTN: Mark Hofman, Community Development Director and SEPA Responsible Official

RE: Comments on the Draft Environmental Impact Statement (DEIS) for the proposed Planned Commercial/Industrial Project for the historic Snoqualmie Mill property

I am writing to you as the president and co-founder of the registered 501(c)(3) non-profit Snoqualmie Community Action Network (SCAN) in response to the draft environmental impact statement (DEIS) for the proposed commercial/industrial development (PCIP) of the Snoqualmie Mill site.

Due to the size and breadth of the DEIS, we submitted a request for extension of the public comment deadline on Monday, July 6th to this department, and we maintain this request, which has also been affirmed by our attorney, David Bricklin, as you will see in an attached letter.

For the purpose of assembling our official comments on this document, we retained the services of attorney David Bricklin, wetlands specialist Sarah Cooke, toxicologist Pam Jenkins and traffic engineer Gary Norris. All of their expert reviews are attached to this letter and should be included in the public record as the official opinion and position of SCAN and all of its members.

I am also attaching two sets of supplemental comments from citizen reviewers whose comments should be regarded as part of SCAN's official response to the DEIS.

Additionally, we wish to incorporate into our comments, by reference, comment letters from the King County Permitting Division (7/10/20) and the King County Historic Preservation Program (7/9/20). We also include by reference letters from the Department of Ecology Toxics Cleanup Program, Wetlands and Shorelands Program, and Water Quality Program, all sent to Mark Hofman on or around July 10th, 2020, which our organization has been assured exist by our consultant Sarah Cooke, but which we have not seen. 15-1

Several of our board members and general members are also submitting individual comments to your department, which should be included in any future review of SCAN's response to this proposed project.

Our formal stance as an organization, as stated by our attorney in his firm's attached letter, is that "the DEIS should be withdrawn, corrected and re-issued to provide an adequate analysis of environmental impacts, to correct any factual inaccuracies, to analyze all direct, indirect, and cumulative environmental impacts, to consider existing and surrounding land use, to address environmental health impacts of disturbing substantial amounts of hazardous contaminants, and to consider appropriate and reasonable alternatives that are sufficiently different and less environmentally degrading from the current proposal. It is not sufficient to address the current deficiencies in the Final EIS. By including so much new analysis in the final document, the City would be precluding the public and other agencies from their right to review and comment on a draft EIS. When new alternatives are developed and new analysis like that required for Borst Lake is included, it must be first set forth in a draft so that the public and other agencies can review and comment, as required by the SEPA rules."

15-2

Thank you for your time in closely reviewing all of the materials we have submitted.

Sincerely,

Dana Hubanks
President & Co-Founder
Snoqualmie Community Action Network (SCAN)
snoqualmieaction@gmail.com

Letter No. 15A

BRICKLIN & NEWMAN LLP
lawyers working for the environment

Reply to: Seattle Office

July 10, 2020

VIA E-MAIL: MillSiteEIS@snoqualmiewa.gov, mhofman@snoqualmiewa.gov

City of Snoqualmie
Department of Community Development
Attn: Mark Hofman, Community Development Director and SEPA Responsible Official
P.O. Box 987
Snoqualmie WA, 98065

Re: DEIS Comment Letter fo the Snoqualmie Mill Planned Commercial/Industrial Plan

Dear Director Hofman:

Thank you for the opportunity to comment on the Snoqualmie Mill Planned Commercial Industrial Plan Draft Environmental Impact Statement ("DEIS"). These comments submitted on behalf of the Snoqualmie Community Action etwork ("SCAN") are intended to supplement comments you will receive from individual members. SCAN is a registered 01(c)(3) nonprofit organization advocating for a safe, healthy and sustainable future for the Snoqualmie Mill site and the surrounding community.

First, we formally request a 60-day extension to the comment deadline. The public and other agencies are entitled to additional time o review and comment on an almost 3,000-page DEIS that took three years to develop. The complexity involved in developing hundreds of acres of land, with over 40 acres of wetlands within a floodplain next to a river, on top of a historical site, and on a site known to have considerable amounts of hazardous contamination, warrants additional time for review and comment. The need for additional ime i particularly critical given the current pandemic. Public participation is limited. Agencies are short staffed. Offices are closed. Consulting experts are frequently unavailable. Resources are stre ched. To proceed with business as usual, given the current conditions, is profoundly unjust to the public and the environment. 15A-1

We adopt by reference the comments submitted by the Department of Ecology and King County.

I. THE DEIS FAILS TO ADEQ ATELY ADDRESS IMPACTS

A. Because of the Significant Environmental Impacts of the Proposal ore Detail and Analysis Are Required.

The purpose of State Environmental Policy Act ("SEPA") is to avoid environmental degrada ion by requiring actions be based on a "hard look" at environmental issues. To comply with the ' hard look" requirement, an EIS must "provide a reasonably thorough discussion of the significant aspect of the probable environmental consequences of he proposed action." *Wey rhaeus r v. Pierce County,* 124 Wn.2d 26, 37 (1994). General statemen s about possible effects and risks do not constitute a hard look.

The amount of information required is largely dependent upon the nature and extent of he project's adverse environmental impacts. The more significant the environmental impacts, he more detailed and thorough the EIS analysis mus be. WAC 197-11-402(2) ("level of deta'l shall be commensurate with the importance of the impact"); WAC 197-11-440( )(c)(viii) "[t]a'lor the level of detail of descriptions to the significance of environmental impacts"). Environmentally significant proposals, such as the Snoqualmie Mill Planned Commercial Industrial Plan (hereinafter "Mill Plan") are subject to earching environmental scrutiny.

The significant impacts of the Mill Plan are of a m nitudc that morc, not s, analysis i required in the EIS. The proposal involves the development f 166 acres over the nex 0 1 years into 1.83 million gross square feet of industrial, manufacturing, warehouse, office, retail, restaurant, and residential uses. This massive development would occur on a contaminated "brownfield" site known to contain polychlorinated biphenyls (PCBs), hydrocarbons, and other chemical contaminants. The site sits atop an aquifer, is surrounded by vulnerable water resources—wetlands, a lake, and a river in almost every direction, and lies within floodway and channel migration zones. There are seventeen wetlands on the site, totaling approximately 41 acres. (DEIS at 3-91). The Mill Plan will destroy historic buildings and an archeological site. It will cause increased noise, traffic, and stormwater runoff. And it will do all of this while deviating from standards for building height, wetland buffer widths, and permitted land uses. The Mill Plan will require a variety of conditional use permits, variances, approvals, and significant expansion of infrastructure in the form of bridges, roads, and sewers water treatment. In short, the Mill Plan seeks to build a residential, commercial, and industrial district on a contaminated site next to fragile natural resources while lacking adequate infrastructure for the development. This plan is dramatically different from existing and surrounding land use. SEPA commands that in a situation like this more detailed analysis is required. 15A-2

Because of the considerable significant environmental impacts and health risks posed by the proposal, the EIS must provide a detailed and thorough analysis of the proposal and a range of reasonable alternatives.

> An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

WAC 197-11-400(2). The EIS shall be "concise, clear, and to the point, and shall be supported by the necessary environmental analysis." WAC 197-11-400(3). The EIS shall "serve as the means of assessing the environmental impact of proposed agency action, rather than justifying the decisions already made." WAC 197-11-400(10). Many of the comments by SCAN and other community members demonstrate that important environmental impacts have not been adequately analyzed. *See, e.g.,* DN Traffic Consultants, Inc. Memorandum (July 3, 2020) (detailing inaccuracies and inadequacy of DEIS traffic/transportation analysis), Cooke Scientific Review of Snoqualmie Mill PCI Plan Draft EIS (July 9, 2020) (identifying inadequate analysis related to water resources), and Practical Environmental Solutions comments (July 10, 2020) (providing general and contamination-related concerns). 15A-2

WAC 197-11-444 provides a list of elements that must be analyzed during environmental review. With regard to numerous environmental issues (*e.g.,* surface water, groundwater, public water supplies, plant and animal habitat, scenic resources, releases of toxic or hazardous substances affecting public health, relationship to existing land use, aesthetics, historic and cultural preservation, and transportation), the DEIS does not adequately analyze or improperly defers detailed analysis.

B. The DEIS Should Analyze Impacts Regarding Borst Lake.

The Mill Plan site lies immediately north of Borst Lake. The lake, known to contain toxins and contaminants, is hydrologically connected to the Mill Plan site and Snoqualmie River. As discussed in various comment letters submitted by others, the Mill Plan will undoubtedly impact the Borst Lake, and Borst Lake will impact the Mill Plan Site and Snoqualmie River. *See e.g.* Cooke Scientific Review of Snoqualmie Mill PCI Plan Draft EIS (July 9, 2020). Yet the DEIS repeatedly avoids analysis or discussion of the impacts related to Borst Lake on the basis that "Borst Lake is not owned by the applicant and is not part of the proposed action." (DEIS, 1-1). While Borst Lake is not owned by the applicant and, therefore, direct impacts may not arise, the EIS must assess indirect and cumulative impacts, too. WAC 197-11-792(2)(c). The EIS cannot ignore Borst Lake impacts by limiting its discussion to direct impacts alone. 15A-3

C. The DEIS Fails to Adequately Analyze the Environmental Health Impacts of Disrupting the Hazardous Contaminants on the Site.

The Mill Plan proposes considerable construction and disruption of land and soils that are heavily contaminated from almost a century of an industrial lumber mill operations. The DEIS states that the Mill Plan will not contaminate the site because the contamination is the result of previous operations and the current proposal will not add to the existing contamination. "The legacy contamination that exists in Planning Areas 2 and 3 is not considered to be an impact of the proposed action . . . ." (DEIS 1-21). 15A-4

This approach in the DEIS is inadequate for at least three reasons. First, it fails to adequately consider that dislodging contaminants on the project site during construction will create environmental health and safety impacts that should be analyzed in more detail in the DEIS. Second, the DEIS effectively kicks the contaminated can down the road. The DEIS incorrectly suggests that the contamination issue can be addressed at later stages of the project involving the

more contaminated portions of the Mill Plan site. We discuss this improper use of phased review later in this letter. Third, an EIS must account not just for the project's impacts, but for the condition of the existing environment. Location matters. Redevelopment of a contaminated site will have significantly different impacts than the same proposal would have at an uncontaminated site. The EIS cannot ignore the fundamental public health issues triggered by the proposed development of this hazardous site which extends onto adjacent property. *See* WAC 197-11-330(3)(a) ("same proposal may have a significant adverse impact in one location but not in another location"). 15A-4

The Mill Plan site has a documented history of contamination with minimal and unsuccessful remediation efforts to date. The failure to adequately address the impacts of hazardous contaminants prior to approval threatens to roll right past meaningful review of an environmental health and safety issue that warrants careful consideration now.

D. The DEIS Fails to Provide Adequate Discussion of Mitigation Measures.

An EIS is required to include a discussion of mitigation measures. While the discussion does not have to be as detailed as the discussion of the impacts, the intended environmental benefits must be adequately described. WAC 197-11-440(6)(c)(iv). The mere listing of possible mitigation measures is insufficient to qualify as the reasoned discussion required by the SEPA. Instead, the EIS must include a realistic assessment of the intended benefits of the proposed mitigation measures. *Id.* The draft EIS provides short shrift to mitigation measures, frequently failing to provide the required realistic assessment of their expected impact. 15A-5

II. THE REQUISITE ENVIRONMENTAL ANALYSIS CANNOT BE DEFERRED TO SUBSEQUENT ENVIRONMENTAL REVIEW

The DEIS repeatedly defers a detailed assessment of adverse environmental impacts to later environmental review. SEPA rules are replete with requirements and admonitions not to defer review, but instead to conduct the review as early as possible, when changes in the project are easier to make and before institutional momentum restrains discretion. Thus, SEPA requires that environmental review "be integrated with agency activities at the earliest possible time . . . in the planning and decisionmaking process." WAC 197-11-055(1). *See also* WAC 197-11-406. Delaying analysis results in a dangerous snowballing effect. "Postponing environmental review risks a dangerous incrementalism where the obligation to decide is postponed successively while project momentum builds." *International Longshore and Warehouse Union, Local 19 v. City of Seattle,* 176 Wn. App. 512, 521 (2013). "When government decisions may have such snowballing effect, decisionmakers need to be apprised of the environmental consequences *before* the project picks up momentum, not after." *King County v. Boundary Review Board,* 122 Wn.2d 648, 664 (1993) (emphasis in original). The DEIS is wrong to suggest that later review can take place of the review needed now. 15A-6

The DEIS mistakenly cites SEPA's phased review mechanism as justification for failing to adequately analyze the impacts of the Mill Plan now. SEPA allows phased review but there are important limitations to when it is appropriate. WAC 197-11-060(5). Phased review should not function as a means to avoid adequate analysis of probable environmental impacts of the proposal. Phased review is appropriate when 1) the sequence is from a nonproject document to a document

of narrower scope such as site specific analysis, or 2) the sequence is from an environmental document on a specific proposal at an early stage to a subsequent environmental document at a later stage. WAC 197-11-060(5)(c). Neither of those scenarios are present here.

Phased review is not appropriate when 1) it would divide a larger system into exempted fragments or avoid discussion of cumulative impacts, or 2) it would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document. WAC 197-11-060(d). In the Mill Plan, there are interdependent impacts that will occur regardless of subsequent modifications to phase 2 or 3 plans. For example, road and bridge improvements, historical building preservation or restoration, stormwater management, and water supply and sewage infrastructure expansion will likely be required regardless of phase details. As a result, the DEIS should provide adequate description of the impacts based upon the proposed plan in this EIS. If additional detail is available later, it can be included in an SEIS at a later date. 15A-6

III. THE DEIS DOES NOT DEVELOP APPROPRIATE OR REASONABLE ALTERNATIVES

SEPA requires the consideration of alternatives. RCW 43.21C.030(2)(c)(iii). However, this directive calls for more than simply identifying alternatives. The agency must "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." RCW 43.21C.020(2)(d). The alternatives section of the EIS serves to ensure the decisionmaking body has fully considered other appropriate methods of attaining the desired goal. SEPA's goal of environmentally enlightened and informed decision making depends upon fully developed and creative alternatives to perform a comparative environmental review. WAC 197-11-060; WAC 197-11-440(5).

A. The Sole Action Alternative Is a Slight Modification of the Proposed Action and thus Does Not Provide an Adequate Range of Alternatives. 15A-7

The sole action alternative in the DEIS is not an appropriate alternative. The alternative is effectively the same plan with slightly increased environmental impacts in almost every category discussed. The alternative features almost the same site size, layout, amount of open space, amount of impervious surfaces, uses, traffic, destruction of historical buildings/sites, flood risk, number of phases, construction activity, buffer deviations, noise, and infrastructure needs. The alternative disrupts the same amount of contaminated soil. The only real difference between the Mill Plan proposal and the alternative is that the alternative slightly scales back residential and office uses in exchange for increased warehouse/manufacturing uses and the alternative includes a 3.7 acre outdoor concert venue. This does not provide a meaningful comparison or appropriate alternative required by SEPA. It is a very slightly modified version of the proposed action.

A slight modification to the proposal does not provide an adequate range of alternatives. In *Davidson Serles & Associates v. Central Puget Sound Growth Management Hearings Board,* the court determined that the EIS was inadequate because it did not analyze a sufficient range of alternatives. "The EIS included only a no-action alternative and one additional alternative that was merely a slightly modified version of the proposed action." *Davidson Serles & Associates v. Central Puget Sound Growth Management Hearings Board,* 159 Wn. App. 148, 152 (2010). The

Mill Plan DEIS repeats this mistake. The alternative in the DEIS is a slightly modified version of the proposal, thereby failing to provide an adequate range of alternatives for environmental review under SEPA.

B. The Alternative Is Not Reasonable Because It Results in Equal or Increased Environmental Degradation to the Proposal.

15A-7

"Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, **but at a lower environmental cost or decreased level of environmental degradation.**" WAC 197-11-440(5)(b) (emphasis added). Because the alternative is a very slightly modified version of the proposal, the environmental impacts are largely the same. And the slight modification in the alternative (exchanging a small amount of residential/office use for a warehouse/outdoor concert venue) will result in increased environmental impacts related to noise, traffic, aesthetics, and habitat. The alternative proposed in the DEIS does not offer a lower environmental cost or decreased level of environmental degradation. This is not a reasonable alternative and the DEIS should be withdrawn, revised, and re-issued to include a reasonable alternative with a lower environmental cost or decreased level of environmental degradation.

IV. INCONSISTENT WITH COMPREHENSIVE PLAN

An EIS must address a project's consistency, or lack thereof, with the jurisdiction's land use plans. WAC 197-11-440(6)(d)(i). The draft EIS lists the ways in which the Mill Plan is consistent with the Snoqualmie Comprehensive Plan, but fails to adequately address the project's inconsistencies with various plan elements.

The Comprehensive Plan's vision is to provide a distinctive sense of place with "[a] protected, restored, and valued system of wetlands, streams, and natural areas that define neighborhoods, protect wildlife habitat and ecosystem services, provide for an extensive and easily accessible trail network, and maintain a predominantly green community setting,." (Comprehensive Plan, 1–3). Goal 6 is that "[t]he health, beauty and ecosystem services provided by the City's natural environment are protected and enhanced, and potential hazards to citizen health, welfare and property are minimized." (Comprehensive Plan, 1–18). The Mill Plan seeks to place an industrial and commercial center on a site with seventeen wetlands, bordered by the Snoqualmie River, and abutting Borst Lake. While certain aspects of the proposal will generate environmental rehabilitation, other aspects of the proposal will work in the opposite direction. The Mill Plan will likely cause both temporary and permanent adverse impacts to the built and natural environment creating a jarring inconsistency with the Plan's bedrock vision and policies. The DEIS does not adequately address these inconsistencies.

15A-8

For instance, Comprehensive Plan Policy 5.2.7 directs the city to "[w]ork with property owners and developers to implement best management practices and/or adaptive reuse strategies that will preserve the character and viability of our historic sites, buildings, districts, landscape features and neighborhoods." Here, the proposal addresses only one side of that balance. Re-use is proposed, "if economically practicable," but the Mill Plan proposes the destruction of multiple historic properties. An empty assurance to retain two historic buildings, dependent on economic considerations, while destroying the remaining historic buildings on the site is inconsistent with this policy. The DEIS fails to adequately address this inconsistency.

Land Use & Infrastructure Policy 3.2.7 seeks to, "[e]nsure sufficient water capacity and wastewater treatment capacity are available to support planned economic development within the mill site and urban growth area." However, the proposed Mill Plan would exceed available wastewater treatment capacity and the City has already overcommitted water capacity to planned developments. The DEIS states, "The City's wastewater treatment facility may not have sufficient 5-day Biological Oxygen Demand (BOD) treatment capacity to serve the full buildout of Snoqualmie Mill Planning Area 1 or Planning Areas 2 and 3 under the proposed action . . ." (DEIS 1-40). The DEIS does not address this policy and the inconsistency with the proposed Mill Plan. 15A-8

V. CONCLUSION

The DEIS should be withdrawn, corrected and re-issued to provide an adequate analysis of environmental impacts, to any correct factual inaccuracies, to analyze all direct, indirect, and cumulative environmental impacts, to consider existing and surrounding land use, to address environmental health impacts of disturbing substantial amounts of hazardous contaminants, and to consider appropriate and reasonable alternatives that are sufficiently different and less environmentally degrading from the current proposal. It is not sufficient to address the current deficiencies in the Final EIS. By including so much new analysis in the final document, the city would be precluding the public and other agencies from their right to review and comment on a draft EIS. When new alternatives are developed and new analysis like that required for Borst Lake is included, it must be first set forth in a draft so that the public and other agencies can review and comment, as required by the SEPA rules. 15A-9

We look forward to your response to these comments as well as the comments of the individual members of SCAN and the attached comments from DN Traffic Consultants and Cooke Scientific. Please do not hesitate to contact me if you have any questions.

Very truly yours,

BRICKLIN & NEWMAN, LLP

Audrey Clungeon
David A. Bricklin
Attorneys for Snoqualmie Community Action Network

Enclosures

cc: Client

Letter No. 15B

COOKE SCIENTIFIC

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Snoqualmie Community Action Network July 9, 2020

RE: Review of the Snoqualmie Mill PCI Plan Daft EIS

At your request I have reviewed the Snoqualmie Mill PCI Plan Draft Environmental Impact Statement (City of Snoqualmie, April 2020), with respect to critical areas and the potential significant adverse impacts that could result as a result of the proposed project and have determined the following critical areas issues are present (see below). I have included my resume at the end of this document to establish my qualifications for performing this review.

The document is over 3,000 pages long and was developed since 2017. I feel it important to note for the record that the public has been given only a short amount of time to perform this review during a pandemic; a time when resources are impossible to obtain because offices are closed and agency people are difficult to reach. It is undemocratic to allow permits to go forward during this difficult time.

The exhibits I reviewed in order to make this review are as follows:

City of Snoqualmie. 4/27/2020. Snoqualmie Mill Planned Commercial Industrial (PCI) Plan. Draft Environmental Impact Statement.

Department of the Army. May 3, 2017. NWS-2012-1198 Brookwater Advisors LLC. JD for Snoqualmie Mill Site

King County SWM. July 1992. Letter to Dave Clark, Manager River Planning Section Mill Pond Snoqualmie from Tom Bean River Planning Section.

Otak, Inc and AHBL. 6/2013 and 4/2019. City of Snoqualmie (Grant No. G08000107). Shoreline Inventory and Characterization Report for City of Snoqualmie. 2019 update is a "limited and focused update for the Mill Site

Pers Comm. Louise Bardy, Washington State Department of Ecology, project manager for Toxics Cleanup Program for Mill site.

Raedeke Associates Inc. October 12, 2012. Wetland Delineation & Wildlife Reconnaissance. Snoqualmie Mill.

Raedeke Associates Inc. January 27, 2015. Letter RE: Snoqualmie Mill- Jurisdictional Determination: Additional Delineation Studies

Raedeke Associates Inc. February 9, 2015. Letter RE: Snoqualmie Mill- Jurisdictional Determination: Additional Delineation Studies

Raedeke Associates Inc. April 16, 2015. Snoqualmie Mill- Jurisdictional Documentation USACE ref No. NWS-2012-1198.

US Army Corps of Engineers, Seattle District. Draft October 1, 2007. Tributary and Wetland Information.

Washington State Department of Ecology Permit tracking. https://apps.ecology.wa.gov/paris/ComplianceAndViolations/ViolationsAndPermitTriggers.aspx?PermitNumber=WAR303314&StartDate=7/1/1981&EndDate=7/8/2020

Project Summary Salient To This Review:
The 261-acre PCI Plan site (Figure 1) , located in the City of Snoqualmie and now owned by Snoqualmie Mill Ventures LLC (SMV), was operated as a lumber mill by the Weyerhaeuser Company from 1917 to 1958. It is one of the largest tracts of undeveloped land within the urban growth boundary in all of Washington State. Over the course of the past 50 years, portions of the site have undergone various environmental reviews, including those by the Washington State Department of Ecology, and the USEPA. Many of the activities that occurred while the property was a functioning saw mill happened prior to pollution prevention guidelines were developed by state and federal agencies so as a result, there are numerous issues on the property with toxic chemicals (Figure 2). While very little sampling has been done to-date, chemicals common to sawmills and expected or known to occur on the site include: Polychlorinated Biphenyls (PCB's),creosote, arsenic, chromated-copper-arsenate, formaldehyde, pentachlorophenol (PCP), Phenol, polychlorophenols and tetrachlorodibenzo-p-dioxin, and oils and grease. Associated Earth Sciences wrote a report outlining the presence of PCB's (Associated Earth Sciences, Snoqualmie Mill Site- Areas of Potential Environmental Concern, March 2015). This includes an area of Borst Lake called the "Mill Pond". The overall PCI site has been identified in the DEIS to be a "brownfield" site, with "some legacy contamination remaining after decades of industrial use and a more than a decade of clean-up activities" (DEIS 2020). The Mill site contains some of the worst contamination. This site was listed by the Department of Ecology as a contaminated site in 1993, and though it was not included in the EPA's Superfund sites list, there still has been little cleanup. The EPA has listed the PCI site (including the Mill Pond/Borst Lake) as the second most contaminated site in the State of Washington (behind the Hanford Landfill).

The adjacent Mill Mill Pond/Borst Lake site was part of the Mill property historically and some of the worst toxin accumulation occurred there as a result of the mill. This site is not owned by the applicant and is not part of the PCI Plan site, is not included in the PCI Plan, and is not addressed in the DEIS. This is a critical omission because the activities that occurred on the Mill Pond/Borst Lake site will affect the

adjacent PCI property because according to the wetlands and wildlife inventory done by Raedeke for the Mill Site, all of the drainage ditches on the Mill Site drain into the Mill Mill Pond/Borst Lake, which then feeds directly into the Snoqualmie River. In addition, the PCI Mill and Mill Pond/Borst Lake adjacent sites are all within the floodplain of the Snoqualmie River (Figures 4 and 5). I will discuss why it is crucial to include this site in the EIS throughout my comments below. Failure to consider and assess the Mill Pond/Borst Lake site and omission from the EIS analysis will lead to the project causing significant adverse impacts to the environment of the PCI site and the Snoqualmie River drainage.

The DEIS analyzes three alternatives: (1) the Snoqualmie Mill proposal or "PCI Plan Alternative"; (2) the "Redevelopment Alternative"; and (3) the "No Action" Alternative. The development is proposed over a 10- to 15 year period. None of these alternatives include a discussion of impacts that will come from the adjacent Pond/ Borst Lake site. Little to no data has been collected throughout the Mill Pond/Borst Lake site with respect to the contamination (Pers Comm. Louise Bardy, DOE Toxics Cleanup Program) and no current conditions are discussed in the DEIS for the Pond/ Borst Lake site. I dispute the statement in the DEIS that "the DEIS evaluates the direct, indirect and cumulative impacts associated with the three alternatives." It is impossible to do this without considering the Pond/ Borst Lake site and collecting the data on toxins that has been requested.

The DEIS states that the City is "following the procedures for phased environmental review, as authorized by the SEPA Rules (WAC 197-11-060(5), SMC 19.04.020), for the Snoqualmie Mill PCI plan. Phased review allows environmental review to occur in stages, and to be coordinated with the phases of master planning for a proposal. SEPA analysis of a project, or portions of a project, that is still in the conceptual stage of planning may be evaluated broadly and more generally in an initial environmental document, followed by more detailed and focused analysis in subsequent environmental documents as more detailed plans are developed." I certainly hope that the sampling/data that has been requested by the State both on the PCI property and the adjacent Pond/ Borst Lake site will be done in the next round of SEIS documents. This must certainly be included before a Final EIS is issued.

The Department of Ecology has reviewed this DEIS and at least three departments have commented. The Toxics Cleanup Program, The Water Quality Program and the Wetlands and Shorelands Program have all submitted comments from their reviews. Many of the staff people involved have years-long experience with this site and I hope the City considers their comments because the institutional knowledge of the Department of Ecology should be invaluable to the process of developing the site in an environmentally conscious way.

Significant Issues:

Analyses in the DEIS are significantly inadequate

15B-1

1. **Omission of the Pond/Borst /lake property when considering the**

development of the PCI Property. Despite being asked over and over again by various agencies (Pers Comm. Louise Bardy, Washington State Department of Ecology 7/1/2020) since the 1990's, no data has been collected (or reported) for the areas where the (Mill) Pond/ Borst Lake is situated. This area is known to contain toxins (creosote logs, coal dust, transformer oil). Additionally, the PCI site and Mill Pond/Borst Lake site are in the floodplain for the Snoqualmie River (Figure 4). Despite this, the PCI site application was submitted on March 22, 2017 and deemed to be complete by the City in April 2017 with little to no data provided as requested by the Department of Ecology in the areas that were identified as early as 1990 as needing cleanup from the years of activity by Weyerhaeuser. The Mill Pond area just to the south of the project but historically part of the Mill site does overflow into the Snoqualmie River during high volume storm events. This is not discussed in the DEIS, so the DEIS is insufficient to identify potential significant adverse environmental impacts that will certainly result from the development being built adjacent to, and at times hydrologically connected by, both surface and groundwater to the Mill Pond/Borst Lake, known to contain significant toxins.

15B-1

2. **The DEIS barely discusses the impacts of disturbing the ground to prepare the site for construction (dredging, grading, digging, etc.) and does not address the potential for releasing toxins into the environment causing them to be released to receiving waters and air**. The only reference for this activity is on Page 3-148 and top of 3-149 and the discussion is very curt and not an analysis. The potential for adverse effects on Plant and animal life from physical contamination due to these toxins (Figures 2-4) from the toxic chemicals and noise and light (from the proposed amphitheater) are great and yet again, very little sampling has been done so the chemicals present, their extent, and location of the contamination is not known. The historic activities that were done to bury coal ash and soils contaminated with transmission oil are documented, but where this work occurred is unknown. Workers from the sawmill reported dredging waste from the pond and bulldozing contaminated sawdust and dirt to fill land on the Mill site in areas to create berms. To-date none of these locations are mapped on the known Hazards map in the DEIS and it is crucial this information be obtained before any ground is disturbed. There is a berm along the Mill Pond road and this likely has some of the buried contaminants, but no sampling and testing has been done so we don't know and the EIS doesn't address this. This is why the Department of Ecology has requested sampling throughout the Mill PCI and Mill Pond/Borst Lake properties.

15B-2

3. **The developer has an extensive record of monitoring and reporting violations with the Department of Ecology**. The Department of Ecology has listed 52 violations by the Snoqualmie Mill Ventures since 2016. The most recent (dated 1/30/20) was for exceeding benchmarks. These violations occurred monthly for the first two years and the developer did nothing to respond and the Department of Ecology did not follow-up. They

15B-3

just kept reporting the violations. There are no known consequences or actions taken on these issues by Snoqualmie Mill Ventures despite the Snoqualmie City Council requesting this in June of 2018 . No follow-up is known to have occurred to-date. Of the 52 violations, most are a failure to report or failure to monitor, but they also include a lack of performing analysis, and exceeding benchmarks. The January 2020 issue was the grab sample had a pH of 8.69 and the acceptable value is pH allowance is a pH of 6.5. This is a problem when you consider pH is a logarithmic scale and the sample was 100+ times more pH basic than allowances established. 15B-3

Additionally, there has been construction activity on the site to install a temporary parking lot that initially occurred without permits. The City granted an after-the-fact permit for the work that had already been completed. Another violation due to construction on the Mill/PCI site occurred. The City initiated a new after-the fact permit without tying the new construction to the old violation.

It is the repeat violations and the failure of the agencies to hold the company accountable that concerns the citizens. The development of such a major project on such a vulnerable tract of land with critical areas and potentially hazard issues (that have been barely evaluated) is of obvious concern but is especially troubling when you consider the history of violations by the developer and a history of lack of review or follow up by all agencies. This should be of concern to everyone involved.

4. **Most of the Original delineations done on the PCI property have not been verified since the work was done in September 2013 through May of 2014.** A few were rechecked in 2015 (Raedeke 2012; January 2015, February 2015, April 2015; USACOE 2017). The original Jurisdictional Determination (JD) was granted by the Corps in 2015. The Corps re-evaluated their JD determination in May of 2017 so that is the new official date. No new work was done, however and it should be remembered that the original wetland delineations was done for most of the wetlands in 2013-2014 which is approximately seven years ago. It is now 2020. While the Corps of Engineers didn't issue the jurisdictional determination until 2017 (COE May 2017), the work was done six to seven years ago in areas that are disturbed and prone to significant shifts in vegetation and therefore will most likely experience changes that may differ from the characteristics encountered in 2013 and 2014. **Wetlands are not static systems**. They change with climate and surrounding land use and any number of other influences. That is precisely why Best Available Science requires a new delineation every five years (Sheldon et.al. 2005) and why this is required by the Corps of Engineers and the State of Washington. Even in areas that are stable, the US Army Corps Jurisdictional Determination reviews only last 5-years. I highly recommend the City require all wetland boundaries be re-verified prior to the submittal of a development permit for any of the project phases. The 5-year timeframe for delineations will expire by May of 2022 and will likely be expired 15B-4

by the time any specific permit application is submitted.
The Corps also now only takes jurisdiction over "connected waters of the US". So many of the wetlands on site are not within the jurisdictional authority of the Feds. I would like to remind the City that the State does take jurisdiction over ALL wetlands so any fills or wetlands that are projected to be destroyed need to be mitigated for the purposes of the State. The Corps takes jurisdiction over wetlands 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 20, 21, 22, 24, 26, 27, 28, 29 and ditches 2N, 3S, 7, 9N, 10, 17, 18, 22, 24, 26, 28, 29, 20, 33, 34, 35, 40, and 41 and streams 1, 2, 3, 4, 5, and 6. The DOE also has regulatory jurisdiction over all the wetlands not just the ones listed above. Any wetlands on the Mill Pond/Borst Lake have not been evaluated but could be under the Corps jurisdiction. 15B-4

Also of note: The wetlands were rated in 2013 and early 2014 prior to the latest methodology being issued (

After combing through the wetland reports I found nothing of note that raised questions about the accuracy of the delineations. While I found a few items in the date sheets (such as *Rubus armeniacus* is now given a FAC status it is no longer considered an upland plant), but these are just nit-picky things and does not change the boundaries nor would it change the ratings. The wetlands that were identified in 2012 that were deemed no longer having wetland hydrology were sufficiently assessed through shallow groundwater and observational monitoring with oversight by the Corps.

The directly adjacent and hydrologically connected wetlands on the Mill Mill Pond/Borst Lake area outside of the development are not included in the delineations nor the ratings for the project. This directly affects any wetlands that continue offsite (Wetland 17). Planning Area 3 of the development site and the offsite wetlands in the Mill Pond/Borst Lake area are all connected during high volume storm events as all are within the FEMA floodplain (Figure 5). The land is nearly flat along the course of the Snoqualmie River that is naturally subject to frequent flooding. At its closest point, the western side of the project property is within approximately 500 feet of the Snoqualmie River. All the ditches on the site flow into the Pond/Borst Lake. Stating they are unrelated is nothing more than wishful thinking. Human possession is not a criteria that is viable with respect to assessing if adjacent tracks of land influence each other. Flooding on either (or most likely BOTH) sites could cause historic toxins to travel from the Pond/ Borst Lake to the Snoqualmie River where they will travel downstream (Figure 4). A memo from 1992 from King County Surface Water Management identifies that flooding of as much as 4.5 feet flooded the Weyerhaeuser offices on the proposed Mill Creek site from the Mill Pond Mill Pond/Borst Lake) site during high volume storm events. 15B-5

5. **The Shoreline Master Program (SMP) is supposed to be reviewed every eight years (RCW 90.58.080)** The current SMP dates back to 1993 and is very outdated at this point in time. A new SMP draft (dated May 16, 2019) was submitted to the Department of Ecology in January of 2020. The City is

waiting for a decision. The DOE will either approve the program as written, approve with recommended changes or send the SMP back to the City with required changes to meet statutory and rule requirements. Recommended changes may also be included with the required changes.

Clearly the 1993 SMP is outdated. Having an up-to-date SMP is important because it gives the City guidelines for reviewing a project under Washington's Shorelines Management Act. No further actions on permits for this project should be taken until the new SMP is approved.

15B-5

6. **The discharge of the effluent from wine production could discharge directly into the Snoqualmie River during flood events**. The PCI proposa identifies wine production as an important action that the new development will include. While pre-treatment is proposed for wine production effluent, excavate channels that discharge to the City's wastewater treatment will work most of the time but this will not work during flood events. An emergency storage system or shutoff will be necessary to prevent effluent ending up in the Snoqualmie River during these events. While we assume future permits will include detailed designs of how this would work it is important to call this out so it is not lost in the details of a future application. This effluent may be controlled under normal circumstances but again, high volume storm events need to be considered with the property being so close to the Snoqualmie River. Any storage ponds that receive wine byproduct will need to be protected during storm events to prevent direct discharge of untreated effluent.

15B-6

7. **The potential impacts to PCI on-site wetlands that are to remain after development were not sufficiently analyzed.**

    - No hydrologic characterization was done for each individual wetland under pre-development conditions. The surface water drainage to individual wetlands under pre-development conditions is not known. The topography and basin delineation must be identified for each wetland and used to determine each wetland hydrologic regime in order to determine how to maintain flows to each wetland post-development. An average over the entire plat is in no way sufficient to understand and maintain the hydrologic regime in a wetland post development. It is critical to understand the hydrologic regime defined by depth, duration and frequency of inundation in the wetlands in order to be able to maintain the same regime post-development despite changing everything from groundwater flows to surface water flows and inputs.
    - Groundwater was not sufficiently evaluated. Shallow groundwater wells are present in a few select areas and deeper wells are established for groundwater sampling. Each wetland should have a

15B-7

shallow well (to a few feet in depth) that tracks the actual wetland hydrologic regime. There is no data for what the groundwater contribution is for individual wetlands. These should be established NOW for at least a year before any development occurs so that a hydrologic baseline can be established. There has been no discussion of what happens to the base flow of each of the wetlands when these wetlands are completely surrounded by development; the impacts of grading that will be done just adjacent to these wetlands; the impacts of soil compaction on maintaining groundwater discharge and recharge to each wetland; and the re-direction of surface water flows to individual wetlands from areas not previously contributing. Chapter 8, The Effects of Watershed Development on Hydrology and Chapter 14. Wetlands and Stormwater Management Guidelines in Horner et.al .(2001) discuss the importance of correctly assessing the groundwater contributions to maintain wetland hydrologic integrity. This is the science behind the requirement in the State Stormwater Manual and these references were used to develop the State Stormwater Manual. This is also discussed in depth in Chapters 3 and 4 in, Wetlands in Washington State, Vol .1 a Synthesis of the Science (Sheldon et al. 2005).

- No hydrologic modeling was done for each individual wetland as part of the stormwater plan. Post-construction hydrologic support of wetlands needs to be verified through a detailed monitoring plan that should be established as a condition of approval of the stormwater plan for each phase of development. I mention this now so again, it becomes a condition of approval for the stormwater plan developed for each phase. These characteristics are known and well described in Azous et. al. 1997, Horner et. al. 2001, and they have been incorporated in each State Stormwater Manual since 1999. This information does need to be supplied prior to the issuance of a Determination of Significance. These include recharge calculations for each wetland pre-development so that a comparison can be made to post-construction conditions measured by the Piezometer-wells and gauges. Without this assessment, it is not possible to "achieve the goal of no net loss of sensitive areas and their functions and values". 15B-7

- Cumulative Impacts are not considered in the DEIS. Cumulative Impacts as identified in DEIS document do not cover the indirect effects of having the wetlands that are slated to remain surrounded by development (homes, roads). Also, qualitative and quantitative descriptions of the impacts associated with each alternative need to be provided. The importance of including an assessment of cumulative impacts is discussed in *Chapter 7*, Wetlands in Washington State, Vol .1 a Synthesis of the Science (1). Which states that "wetland loss in Washington State, especially when

permitted on the local level is due in large part to cumulative impacts that are not evaluated when local jurisdictions approve projects on a piecemeal basis".

Suggested Conditions of approval:

1. Hydrologic, Wetland Vegetation and Significant Monitoring under all Best Available Scenarios includes **baseline pre-development (Preconstruction) monitoring.** Guidelines developed by the Puget Sound Wetlands and Stormwater Research Program (Azous and Horner et. al. 2001 Specifically Chapters 10 and 14) , and reflected in the State Stormwater Manual (2005 for this project but 2018 for the BAS guidelines) require a full year of monitoring for each of these components prior to any development disturbance.

   The monthly hydrologic regime needs to be developed for each wetland not just the overall wetland acreage in the plat. The stormwater plan also needs to be developed so as to break down each wetland with an understanding of the water budget and monthly hydrograph for each wetland. The current modeling for the overall site is not in synchrony with BAS and WILL absolutely result in significant adverse impacts to individual wetlands because water will be conveyed based on topography and not what an individual wetland may tolerate. 15B-8
2. Post-construction hydrologic support of wetlands will need to be verified. Once a phase is installed it is absolutely necessary that the elevations and construction in verified to determine if the modeled hydrologic regime is in fact what was installed. Monthly monitoring should be done for the five-year monitoring period required by the City.
3. Actual hydrologic monitoring must be done in each wetland. Piezometer-wells, crest stage gauges at the inlet and outlet should be installed and monitored (if appropriate) on a daily basis using a continuous data logger This should be done preconstruction and each year for a minimum or two years post-construction.
4. Vegetation sampling stations NOT transects should be monitored. Sample stations, at least two in each small wetland and three for each large wetland (for a statistically significant result), should be done in order to track if the vegetation community is changing as a result of the development. Transects are not scientifically viable method for tracking changes to an individual wetland. Individual stations monitored twice-yearly for a period of five years should be evaluated. The work MUST be done by a trained ecologist. A landscape architect would not have the sufficient training to either collect accurate data or evaluate the data and determine vegetation shifts that could indicate adverse significant impacts to the wetland as a result of the development.

5. Significant trees (all species) in wetlands and the buffers must be mapped by location in each WETLAND AND ASSOCIATED BUFFER, and monitored for health by a trained arborist. Only a trained arborist would have the knowledge to identify early signs of tree growth/mortality issues. The mapping must include all trees with a diameter-at-breast-height (DBH) of 6 inches or greater. The arborist should visit each wetland twice-yearly. Once in the spring when the trees are beginning to bud out and a second time in late August at the end of the growing season. Any signs of stress should be identified immediately and passed to the City so that stormwater conveyance and flow modification can occur as soon as possible. 15B-8
6. Signage must be posted along ALL buffers every 100-feet for every wetland.

Thank you for considering my comments,
Sarah Spear Cooke, PhD.
July 9, 2020

Additional References:

Azous, A. and R. Horner (Eds). 2001. Wetlands and Urbanization. CRC Press LLC.

Horner, R. 1989. Long-term Effects of urban runoff on Wetands, in: *Design of Urban Runoff Controls,* L.A> Roesner, B. Urbonas, and M. B. Sonnen, Eds., American Society of Civil Engineers, New York.

Horner, R, Azous, A, Richter, K, Cooke, S. Reinelt, L., and Ewing, K.. 2001. Wetlands and Stormwater Management Guidelines. (Chapter 14). In: Azous, A. and R. Horner (Eds). Wetlands and Urbanization. CRC Press LLC.

Hruby, T. 20014 Washington State Wetland Rating System for Western Washington-2014 Update. Washington State Department of Ecology Publication #14-06-029. https:/Jfortress. wa.1mv/ecy/publications/ ummarvPuges/ 1.:1 06029.htm I.

Reinelt, L. Horner, R., 1990. Characterization of the Hydrology and Water Quality of palustrine Wetlands Affected by Urban Stormwater, King County Resource Planning, King County, Wa.

Sheldon, D., T. Hruby, P. Johnson, K. Harper, A. McMillan, T. Granger, S. Stanley, and E. Stockdale. March 2005. Wetlands in Washington State - Volume 1: A Synthesis of the Science. Washington State Department of Ecology. Publication #05-06-006. Olympia, WA. http://www.ecy.wa.gov/biblio/0506006.html.

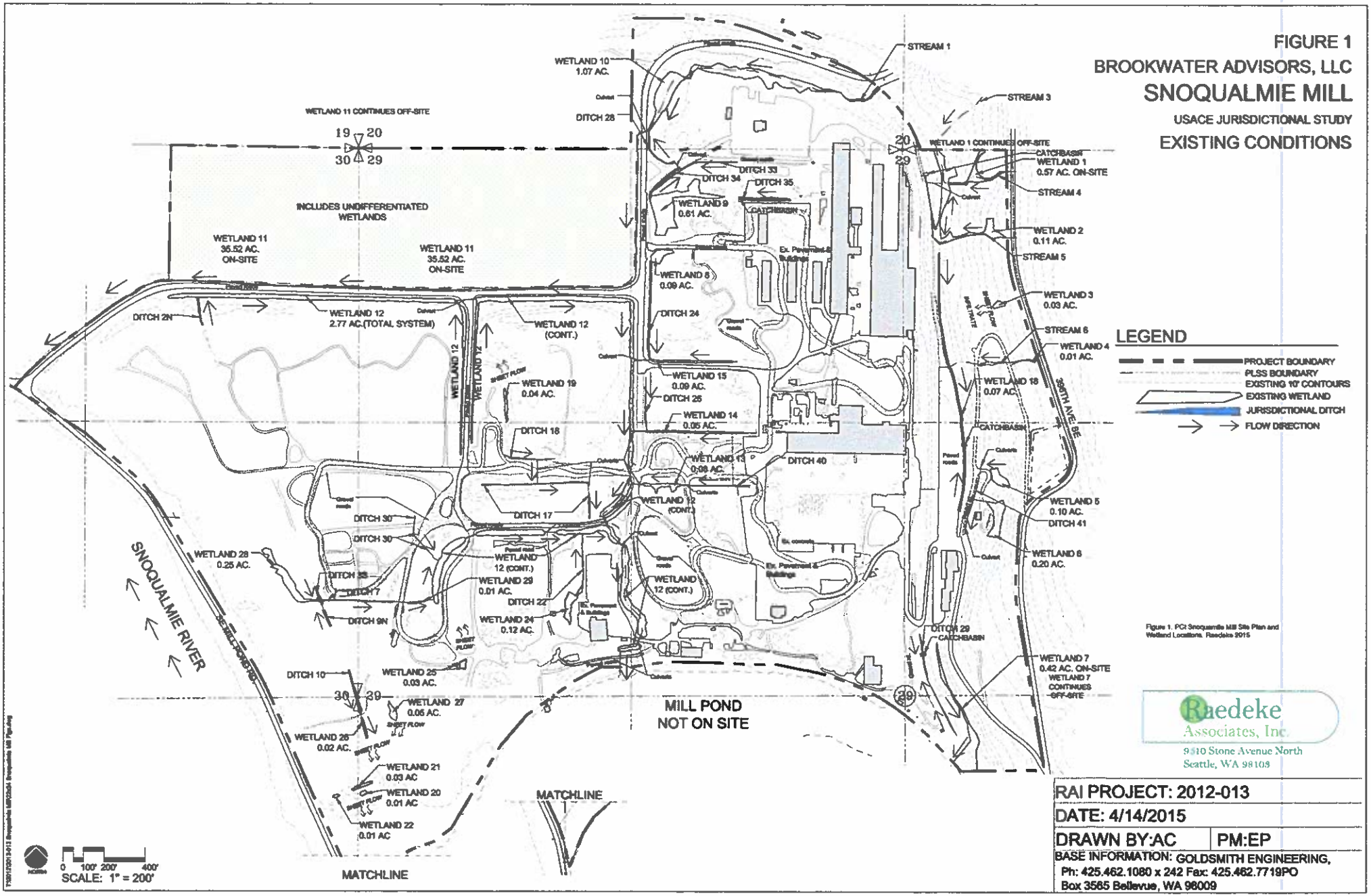


FIGURE 1
BROOKWATER ADVISORS, LLC
SNOQUALMIE MILL
USACE JURISDICTIONAL STUDY
EXISTING CONDITIONS
LEGEND
PROJECT BOUNDARY
PLSS BOUNDARY
EXISTING 10' CONTOURS
EXISTING WETLAND
JURISDICTIONAL DITCH
FLOW DIRECTION
WETLAND 10
1.07 AC.
WETLAND 11 CONTINUES OFF-SITE
INCLUDES UNDIFFERENTIATED WETLANDS
WETLAND 11
35.52 AC.
ON-SITE
WETLAND 12
2.77 AC.(TOTAL SYSTEM)
WETLAND 12
(CONT.)
WETLAND 19
0.04 AC.
WETLAND 28
0.25 AC.
WETLAND 29
0.01 AC.
WETLAND 24
0.12 AC.
WETLAND 25
0.03 AC.
WETLAND 27
0.05 AC.
WETLAND 26
0.02 AC.
WETLAND 21
0.03 AC
WETLAND 20
0.01 AC
WETLAND 22
0.01 AC
WETLAND 9
0.61 AC.
WETLAND 8
0.09 AC.
WETLAND 15
0.09 AC.
WETLAND 14
0.05 AC.
WETLAND 13
0.09 AC.
WETLAND 12
(CONT.)
WETLAND 12
(CONT.)
WETLAND 12
(CONT.)
DITCH 2N
DITCH 18
DITCH 17
DITCH 30
DITCH 30
DITCH 33
DITCH 7
DITCH 9N
DITCH 10
DITCH 22
DITCH 24
DITCH 25
DITCH 40
DITCH 28
DITCH 33
DITCH 34
DITCH 35
SNOQUALMIE RIVER
MILL POND
NOT ON SITE
MATCHLINE
MATCHLINE
STREAM 1
STREAM 3
STREAM 4
STREAM 5
STREAM 6
WETLAND 1 CONTINUES OFF-SITE
CATCHBASIN
WETLAND 1
0.57 AC. ON-SITE
WETLAND 2
0.11 AC.
WETLAND 3
0.03 AC.
WETLAND 4
0.01 AC.
WETLAND 18
0.07 AC.
WETLAND 5
0.10 AC.
DITCH 41
WETLAND 6
0.20 AC.
WETLAND 7
0.42 AC. ON-SITE
WETLAND 7
CONTINUES
OFF-SITE
DITCH 29
CATCHBASIN
CATCHBASIN
Ex. Pavement & Buildings
Ex. Pavement & Buildings
Ex. Pavement & Buildings
SHEET FLOW
SHEET FLOW
SHEET FLOW

Figure 2. PCI Snoquamlie Mill Site Locations of Historic Sources of Contamination.

MANY KNOWN HAZARDS EXIST

#1 Lumber Shed - Soil containing hydrocarbon concentrations above MTCA cleanup levels.

#2 Storage Tanks - Area contains hydrocarbon concentrations above MTCA cleanup levels.

#3 Buried Transformer - Soil contaminated with PCBs still remain at depth (PCBs cause birth defects and cancer).

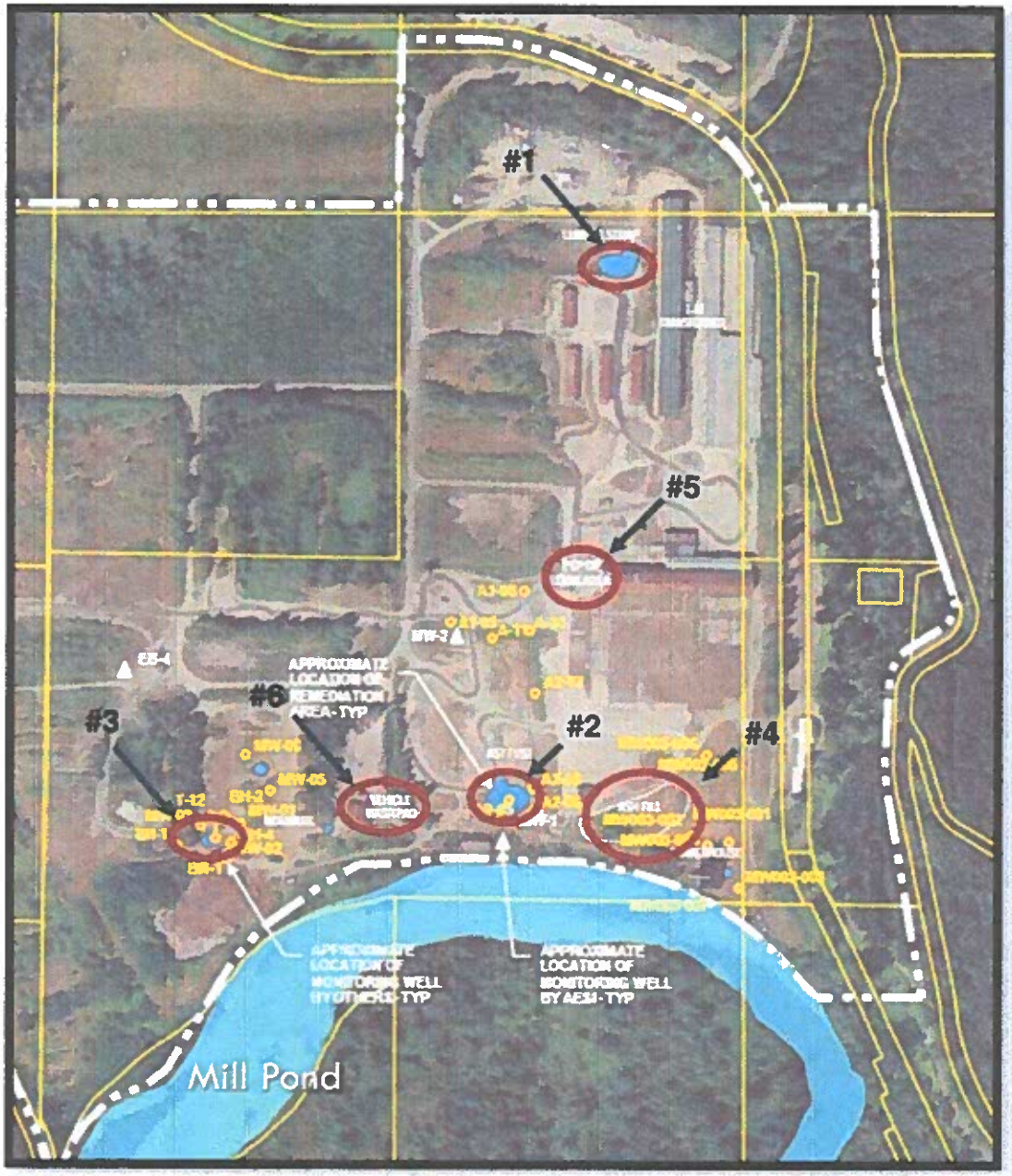
#4 Powerplant - 6,000 cubic yards of boiler ash contaminated with arsenic and cPAHs.

#5 PCP Dip Tank - Ground water may contain tetrachlorophenol and PCP above MTCA cleanup levels.

#6 Vehicle Wash Pad - Ground water may contain hydrocarbon concentrations above MTCA cleanup levels from.

MTCA – Model Toxins Control Act

Developer's Map of Known Potential Environmental Concerns



Monitoring wells have NOT been monitored and will be buried during the development process according to city personnel

TOXIC WASTE WILL WASH INTO THE SNOQUALMIE RIVER

The developer plans to construct wetlands that sit on top of the historic rail yard site and the Mill #2 site (outlined in red).

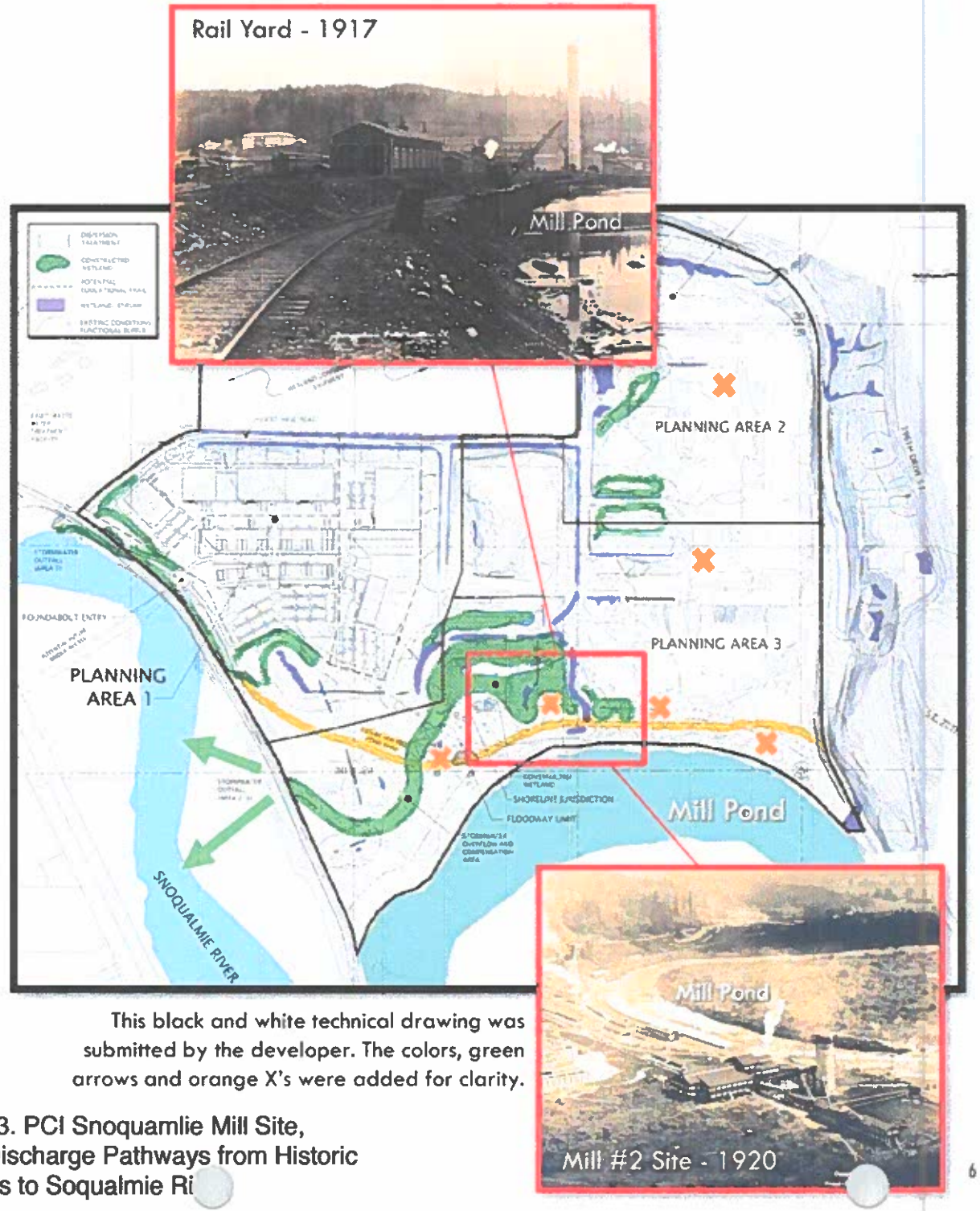
These sites are NOT on the developer's Known Hazards Map.

Constructed wetlands drain directly into the Snoqualmie River.

The future, new Mill Pond Road cuts through the rail maintenance yard.

Currently contained, historic toxins will likely be disturbed by the excavation and be washed directly into the Snoqualmie River.

Once toxins escape into the river, the entire Snoqualmie Watershed is at risk of contamination.



This black and white technical drawing was submitted by the developer. The colors, green arrows and orange X's were added for clarity.

Figure 3. PCI Snoquamlie Mill Site, Toxin Discharge Pathways from Historic deposits to Soqualmie Ri

ESCAPED INDUSTRIAL TOXINS FROM A SNOQUALMIE DEVELOPMENT COULD CONTAMINATE THE WATERSHED



8 bird species, 4 fish species and 1 reptile species protected at the state or federal level live in the watershed. Scores of farms irrigate with Snoqualmie River water. Families recreate in the river.

The City's premature approval of the development could cause irreversible damage to the region.

Figure 4. PCI Snoquamlie Mill and Position in the Soqualmie Watershed Showing the Pathway for a Toxin Discharge

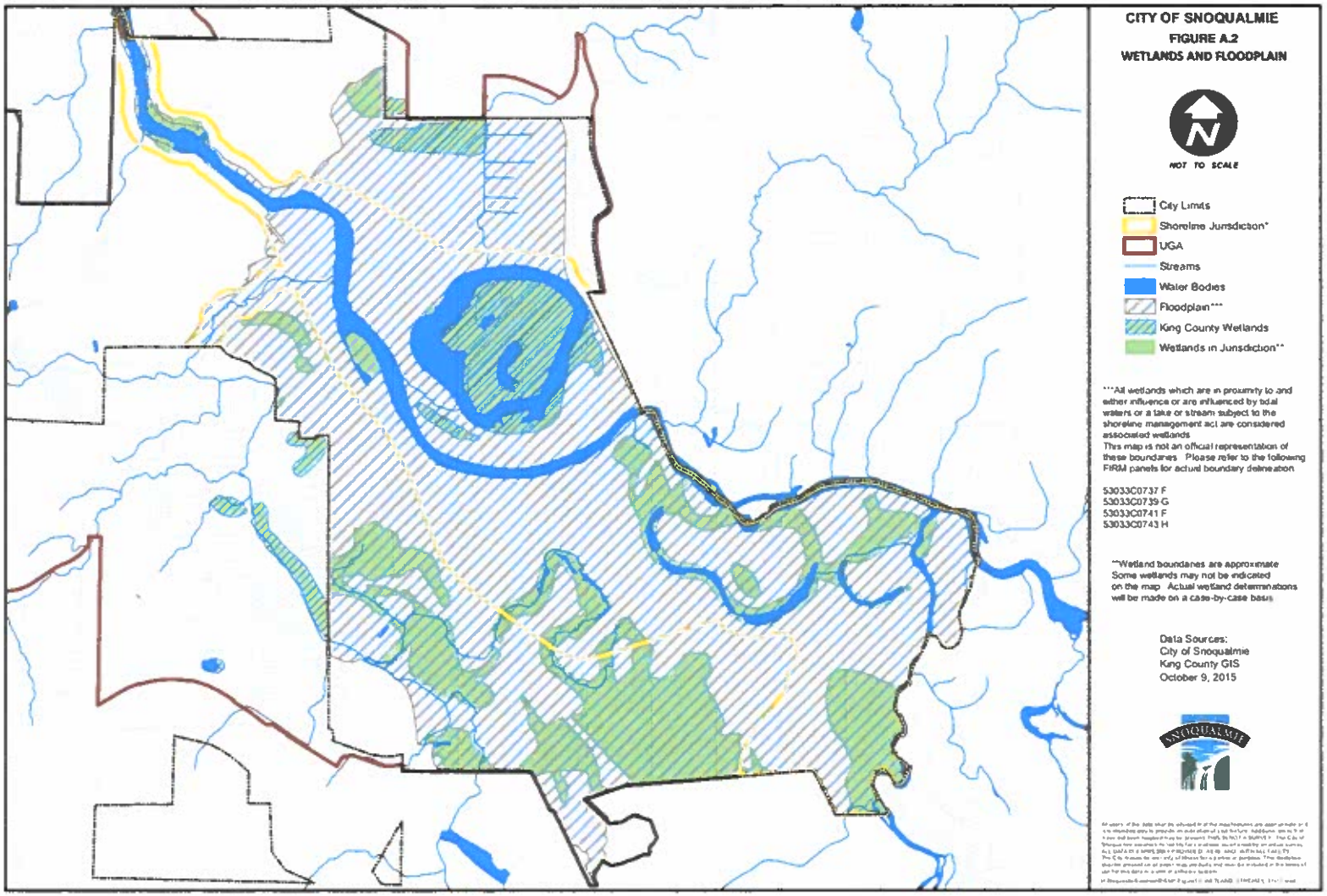


Figure 5. PCI Snoqualmie Mill Site Wetlands and FEMA Floodplain.

Letter No. 15C

Mark Hofman

SCAN

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JUL 10 2020
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Community Development Department

From: jenkins.p2@gmail.com
Sent: Friday, July 10, 2020 7:11 PM
To: Mark Hofman
Subject: Snoqualmie Mill PCI Plan Draft EIS
Attachments: PES Comments - SnoqMillSite DEIS.pdf

Categories: Green category

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Hello Mark,

Please find attached a comment letter on Snoqualmie Mill PCI Plan DEIS.

I appreciate the opportunity to comment and thank you in advance for your thoughtful consideration of these remarks.

Warm regards,

Pam Jenkins, P.E.

PRACTICAL ENVIRONMENTAL SOLUTIONS
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July 10, 2020

Mark Hofman, SEPA Responsible Official
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Transmitted via email to: mhofman@snoqualmiewa.gov

Re: Draft Environmental Impact Statement for the Snoqualmie Mill Planned Commercial/Industrial Plan
7001 396th Drive SE, Snoqualmie, WA
Facility/Site ID: 2274. Cleanup Site ID: 2049

Dear Mark:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan proposed by Snoqualmie Mill Ventures LLC. This letter focuses primarily on the toxics cleanup issues on the site, soil and groundwater impacts, and the need for strict oversight of remedial activities and future grading and excavation that may occur on the property.

Practical Environmental Solutions reviewed the DEIS on behalf of Snoqualmie Community Action Network, which is concerned about the safety of the proposed redevelopment at this contaminated site, and its further potential impacts on the environment and many aspects of the City of Snoqualmie's character and livability. The DEIS was accessed through the City of Snoqualmie website (www.ci.snoqualmie.wa.us/393/Mill-Property), other documents from the developer's website (http://snoqualmiemill.com/development/documents/), some provided by Snoqualmie Community Action Network, and older related documents found on Department of Ecology's contaminated site database. A list of the documents reviewed for this comment letter is attached.

I appreciate your thoughtful consideration of these comments.

Sincerely,

Pam Jenkins, PE
Principal

Comments on the Snoqualmie Mill Planned Commercial/Industrial Plan
Draft Environmental Impact Statement

Comments are organized below into two general categories for your consideration: *General and Sitewide Comments* and *Comments on Known Areas of Contamination.*

General and Sitewide Comments

1. There has never been a comprehensive remedial investigation conducted on the Snoqualmie Mill property. Over the years, several distinct areas of suspected contamination have been investigated and remediated to varying degrees. These locations are repeatedly discussed in several documents, as noted in the list of documents reviewed for this commentary (attached). However, there may be contaminated areas that are as yet undiscovered and undefined. It appears that no one has recently done a comprehensive review of historic site operations to determine what might not yet have been identified, nor has a sitewide evaluation of key environmental parameters been established. Additional comments below expand on this topic. 15C-1

2. New construction in a plan area should not be permitted until that area is shown to be fully remediated. To assume that new construction and remediation can happen simultaneously is risky to both the environment and construction workers, and to nearby residents and businesses, unless the hazards are well defined and the remedial activities are able to be well sequestered from other construction activities. Moreover, the City must assure that remediation reaches completion as determined by Department of Ecology. 15C-2

3. There is no established network of groundwater monitoring wells on the site from which could be gained an understanding of the groundwater flow path across the site, and the potential movement of contaminants in groundwater below the site and potentially into adjacent bodies of water. All previous groundwater investigations have covered a limited lateral area, and most wells were monitored for only short periods of time. Thus there is no solid understanding of the bigger picture of groundwater behavior or water quality across the entire site. This network of monitoring wells should be sampled on a regular (quarterly) basis, and samples analyzed for the known contaminants of concern. This may also help determine the source of unexplained groundwater contamination identified in previous specific contaminated area investigations. 15C-3

   This groundwater monitoring network should be established now, prior to development activities, and groundwater sampling continued through additional remediation work and

development construction to ensure contaminants are not being reintroduced or pushed in groundwater. Sampling may need to continue post-development to ensure water quality stability and maintenance of the groundwater cleanup goals. 15C-3

4. Has the impact of this site's groundwater on surface water quality in the Snoqualmie River and associated wetlands ever been examined? For a site of this size with decades of industrial activity that included many sources of subsurface contamination, such a study should be undertaken now, before the commencement of redevelopment grading and construction. There may be a need to establish mechanisms for protecting the river and wetlands from the site's groundwater, even and perhaps especially before remediation projects are complete. 15C-4

5. Understanding that Borst Lake is not part of the proposed development, there are still environmental connections between that body of water and the property proposed to be developed. What is Borst Lake's impact on groundwater beneath the Plan 1 area? What is the impact of the entire property's groundwater on Borst Lake? 15C-5

6. Over the years, there have been numerous monitoring wells installed near suspected or known locations of contamination, but many of these wells have been abandoned. Wells that are no longer operable or useful within a future monitoring network should be properly decommissioned according to Ecology requirements (WAC 173-160-381). The City should consider making this a requirement prior to issuance of any grading permit for development of the site. Due to the sensitivity of the shallow aquifer, and the possibility of contaminating the lower aquifer if a well extends into it, this issue is of substantial concern. 15C-6

7. From a recent discussion with Ecology (Bob Warren, Toxics Cleanup Program, July 8, 2020), it is clear that the agency does not have current capacity to engage in the cleanup process needed at the Snoqualmie Mill Site, nor does it anticipate having that capacity for at least two years due to current state government budget cuts. How does the City plan to close this gap? The cleanup issues on this property, especially in Plan Areas 2 and 3, are significant. But there may also be contamination issues in Plan Area 1 that must be remedied prior to start of construction as noted above. In past reports, certain consultants have developed site-specific cleanup levels for contaminants in soils that are not commensurate with current regulations and would not have met Ecology's approval. The City must have assurance that Ecology will engage with the developer to ensure this property is appropriately remediated, before grading permits are granted. 15C-7

8. On page 3-149 of the DEIS, under "No Action Alternative," which provides a description of the property and associated impacts without any development, the assumed result is that 15C-8

contaminated areas would not be cleaned up. However, Ecology could at any time name Snoqualmie Mill Ventures a "potentially liable party" and pursue cleanup under a consent decree or agreed order. This would result in the same environmental improvements as those noted in the discussion of the preferred alternative (see pp. 3-147 to 3-148). In other words, development of the property is not the only condition through which remediation of the contaminated areas could occur. 15C-8

The Farallon reports (DEIS Appendix D) do an excellent job of capturing and summarizing information from previously documented accounts of investigations and remedial efforts on the suspected or confirmed contaminated areas on the property. Generally, we agree with the identification of known and suspected contaminated media at various locations, as summarized in Exhibit 3.5.2 on p. 3-143 and discussed in Appendix D-2. However, based on what is known of historic practices, facilities, and activities, there may be additional areas that should be investigated. Furthermore, several of the previous remedial efforts failed to consider some potential contaminants or to document confirmation of cleanup goals. These issues are noted by Planning Area and contaminated site in the comments below.

9. **Planning Areas 1, 2, and 3, railways.** The Environmental Evaluation Report (Farallon Consulting, LLC, DEIS App. D-1, p. 4-2) indicates that a railroad track extended into the western portion of Planning Area 1 from roughly 1917 to the late 1950s. Planning Area 1 is believed to have been used primarily as a log storage area. Presumably, there were also railways in Planning Areas 2 and 3. Shallow soils under the tracks may have been contaminated by products often associated with rail operations, including herbicides, petroleum contaminants, and heavy metals. All of the railway areas need to be investigated and remediated as appropriate based on sample analysis results. 15C-9

10. **Planning Areas 1, 2, and 3, roadways.** Dirt roads all over the property were apparently treated with oil to suppress dust. This roadway oil could have been a combination of clean and used oils, and possibly solvents, that could have contaminated soils with petroleum constituents, heavy metals, and other organic contaminants. Herbicides may also have been used on these roadways. There has been no investigation of potential contamination in these areas. 15C-10

11. **Planning Areas 1, 2, and 3, storm ditch sediments.** A network of earthen storm ditches within the property drained stormwater from the site for decades. Sediments in these ditches are likely to be contaminated with petroleum constituents, heavy metals, polychlorinated biphenyls (PCBs), and herbicides. No prior investigation or cleanup of ditch sediments appears to have been conducted. 15C-11

Comments on Known Areas of Contamination

12. **Planning Area 2 – Lumber Strapping Area.** According to *the Summary of Environmental Investigations and Cleanup Activities* report (Farallon Consulting, LLC, April 18, 2019), historical operations in this area included sealing the end grain of the lumber that was stacked in this area. With what material were these lumber ends sealed? Were there hazardous constituents in this sealing product, such as lead, formaldehyde, or petroleum constituents? Were the lumber ends treated over the concrete pad or over the ground? Further investigation of the soils in this area may be warranted. 15C-12

    The March 3, 2005, *Current Conditions Report* by Associated Earth Sciences, Inc. mentions the presence of petroleum-contaminated soil beneath the storage shed located east of the Lumber Strapping Area. This is not mentioned in Farallon's reports in the DEIS, and represents another location that deserves investigation, and cleanup if indicated.

13. **Planning Area 2 – Transformer T-18 Area.** Cleanup efforts conducted at this location included excavation and bioremediation of petroleum contaminated shallow soils. The transformer is reported to have not contained PCBs. However, there appears to be no information regarding the ultimate disposition of those soils or of confirmation sampling conducted in the area of the release. Thus, additional investigation is needed to verify whether soils in this area meet Model Toxics Control Act (MTCA) Method A cleanup levels. In addition, what is the depth of groundwater in this area? Might groundwater also have been affected? A groundwater investigation should also be conducted at this location. 15C-13

14. **Planning Area 3 – UST Area.** According to Farallon's description, about 1,000 cubic yards of contaminated soil were removed from this area in 1989 and treated somewhere on the property. It appears there is no information about whether this soil reached suitable cleanup levels for reuse onsite, nor where the soil may have been redeployed. It also appears that no confirmation sampling was conducted following excavation of the contaminated soil to ensure that remaining soil was below cleanup levels. Later remedial efforts in this area included removal and onsite bioremediation of another 6,800 cubic yards of soil. Farallon points out that the permit closure report did not provide actual sampling results to confirm remaining in-ground soils met the cleanup levels. Likewise, it appears there was no confirmation sampling to indicate that the treated soil met cleanup standards before it was redeployed into the UST Area excavation. Frankly, it is difficult to have confidence in the performance of these cleanup efforts. 15C-14

    Groundwater under the tank area was also impacted by petroleum contaminants and lead at

this location. The presence of lead was apparently attributed at the time to background concentrations, but this is not a reasonable assumption unless background lead concentrations in groundwater had actually been measured in an upgradient background (i.e., unimpacted) location. Obviously, lead was a constituent of gasoline for many years before it was finally banned as a gasoline additive in 1996. Lead, among other contaminants, should be considered a property-wide contaminant of concern for groundwater. More investigation is clearly required in the UST Area for both soil and groundwater. 15C-14

15. **Planning Area 3 – AST Area.** Similar to the investigation and cleanup efforts in the UST Area, activities within the AST Area appear to have left contaminants in soil and groundwater in place above MTCA Method A cleanup levels. The Farallon report notes that there was no record of Ecology approval of the consultant's calculation of site-specific MTCA Method B cleanup levels in 2006, when presumably treated soil was reburied at this location. 15C-15

16. **Planning Area 3 - Morbark Area.** Although petroleum contaminated soil has been removed on two separate occasions from this area, the calculated site-specific Method B cleanup levels were far above current Method A cleanup targets. Supposedly remediated soil, meeting an enormously high site-specific cleanup level [13,295 mg/kg for diesel range organics (DRO) and oil range organics (ORO)], far above current Method A soil clean up levels, was reburied onsite. (*Current Conditions Report,* Associated Earth Sciences, Inc., March 5, 2015, p. 5.) It is imperative that this type of "cleanup" be avoided. Ecology MUST have oversight so that the City, construction workers, and future residents can be assured the property is not an unhealthy place. 15C-16

17. **Planning Area 3 – PCP Dip Tanks.** Previous investigations in this area indicate the presence of contaminants above MTCA Method A levels in groundwater, but not above current cleanup standards in soil. Soil impacts may be greater in shallower soils, above where the only samples were taken (5 feet below ground surface). More investigation at this area is warranted. Also, we encourage consideration of where the treated lumber was dried. Was the drying area inside the buildings or outside? If outside, there is a possibility that additional shallow soils may also have been impacted. 15C-17

18. **Planning Area 3 – Transformers T-12 and T-17.** Farallon's *Summary of Environmental and Investigation and Cleanup Activities,* April 18, 2019, clearly indicates groundwater was contaminated by PCBs near both transformers T-12 and T-17. Contrarily, however, Exhibit 3.5-2 Areas of Known and Suspected Areas of Contamination on p. 3-143 of the DEIS does not indicate groundwater contamination has been confirmed at Transformer T-17. 15C-18

19. **Planning Area 3 – Boiler Ash Fill Area.** The volume of ash at this location is estimated at 6,000 cubic yards. Arsenic and carcinogenic polycyclic aromatic hydrocarbons (cPAH) in the ash are above MTCA Method A cleanup levels. One sample was found also to be high in cadmium, a toxic heavy metal. However, this investigation failed to analyze the ash for dioxins, a family of highly toxic, carcinogenic, and persistent compounds frequently found in industrial wood ash. Moreover, it is quite possible that boiler ash has been used across the site as a soil amendment or conditioner, or simply as fill. Dioxins should be noted as a potential contaminant to soil and groundwater at this location. In addition, the presence of dioxins in surface soils should also be investigated prior to grading or excavation for construction. 15C-19

20. **Planning Area 3 – Vehicle Wash Pad.** The source of DRO and ORO in groundwater above MTCA Method A cleanup levels under the vehicle wash pad needs to be investigated. If soil samples near or under the wash pad are not at least moderately contaminated with petroleum contaminants, then the contamination found in groundwater under the wash pad may have originated from another source besides the wash pad itself. 15C-20

21. **Planning Area 3 – Other Potential Areas of Concern.** We appreciate Farallon's inclusion of these three additional areas that could be contaminated (p.3-21, *Summary of Environmental Investigations and Cleanups,* April 18, 2019), based on limited knowledge of past uses in these locations. These areas should certainly be included in a comprehensive remedial investigation of the property. 15C-21

Final Comments

In conclusion, there is a huge amount of work to be done to prepare this property for development. Minimizing that effort and the substantial investment it will require would be a grave mistake. The residual hodgepodge of partial cleanups of localized areas of contamination that have been done on the property are a great lesson in how remediation should not be undertaken. Fortunately, the investigative tools, analytical methods, and remediation methods we have now represent a substantial improvement over what was available when the initial cleanups were attempted on the Weyerhaeuser Mill Site. 15C-22

The known presence of PCBs onsite and the probable presence of dioxins in the Boiler Ash Area are extremely significant because of their persistence in the environment, toxicity, and cancer-causing attributes. The sooner these areas are addressed, the better.

It would be naïve to assume without any investigation that there is no contamination in Planning Area 1. The former presence of a railway in that area is one potentially contaminated area, and there may be others. Obviously, Planning Areas 2 and especially 3 have significantly more known areas

of contamination. Consideration must be given to the potential impacts remediation activities in Areas 2 and 3 may have on future residents and businesses within Planning Area 1, if cleanups in Areas 2 and 3 are undertaken after development of Planning Area 1. A comprehensive approach to remediating the entire property is recommended. This approach needs to include gaining an understanding of the groundwater flow path(s) across the site and potential impacts of contaminated groundwater on adjoining wetlands and surface water. The property boundary lines do not limit the migration of contaminants as do fences the wandering of cattle.

Ecology's oversight of remedial investigation, design, and execution is extremely important. It appears that some of the former cleanups that need to be redone are the result of proceeding without Ecology's guidance or approval, hence they were a waste of resources. It would be our hope that a developer would endeavor to leave a legacy of property improvement – not just in the visible areas aboveground, but in those essential parts of the environment that are under our feet, beneath our buildings, and flowing silently and steadily toward ever larger surface waterways…a legacy of environmental improvement. Therefore, we recommend getting onto Ecology's cleanup schedule and working with the Department to establish an appropriate mechanism to accomplish remedial activities on the Snoqualmie Mill Site that works within their resource limitations and a reasonable development timeframe. 15C-22

Documents reviewed in preparation of these comments:

2020-07-03 Cleanup Site Details, Weyerhaeuser Snoqualmie Mill, CSID ID: 2049, FSID: 2274, Ecology Suspected and Confirmed Contaminated Site Data Base (online); report generated 2020-07-03.

2020-04 Snoqualmie Mill Planned Commercial/Industrial Plan Draft Environmental Impact Statement, prepared by numerous consultants for City of Snoqualmie.

2019-04-18 Environmental Evaluation Report, Snoqualmie Mill Planning Area 1, prepared for Snoqualmie Mill Ventures LLC, by Farallon Consulting LLC. (App. D-1 in Draft EIS)

2019-04-18 Summary of Environmental Investigations and Cleanup Activities, prepared for Snoqualmie Mill Ventures LLC, by Farallon Consulting LLC. (App. D-2 in Draft EIS)

2016-07 Mill Planning Area Post Annexation Implementation Plan, prepared for Snoqualmie Mill Ventures, LLC, by Goldsmith Land Development Services.

2015-03-05 Environmental Site Assessment - Current Conditions Report, Snoqualmie Mill Site, prepared for BrookWater Advisors/Snoqualmie Mill Ventures, by Associated Earth Sciences, Inc.

2011-09-22 Staff Summary of Former Weyerhaeuser Mill Site Reported Environmental Activity and Remediation, by Planning Department, City of Snoqualmie.

2011-09-08 Mill Planning Area Proposed Annexation, EPA Documents Reviewed by City of Snoqualmie Staff.

2004-12-15 Level III Environmental Site Assessment, Weyerhaeuser Company, for Weyerhaeuser Company, by Delta Environmental Consultants, Inc.

2004-06-29 Level II Environmental Site Assessment, Weyerhaeuser Company, for Weyerhaeuser Company, by Delta Environmental Consultants, Inc.

1993-12 Level 1 Environmental Analysis, Weyerhaeuser Snoqualmie Mill Site, for Weyerhaeuser Real Estate Company, by Shannon & Wilson, Inc.

1989-05-07 EPA Potential Hazardous Waste Site Identification - Weyerhaeuser Co. - Snoqualmie Plywood (USEPA SF 1335765).

2004-12-15 Level III Environmental Site Assessment, Weyerhaeuser Company, Snoqualmie, for Weyerhaeuser Company, by Delta Environmental Consultants, Inc.

2004-06-29 Level II Environmental Site Assessment, Weyerhaeuser Company, Snoqualmie, for Weyerhaeuser Company, by Delta Environmental Consultants, Inc.

No date. Summary of Environmental Site Assessments. No author stated.

Addendum

So who is Pam Jenkins?

B.S. Mechanical Engineering, University of Colorado
M.S.E. Civil/Environmental Engineering, University of Washington
M.Div., The King's University
P.E. Civil No. 27041

Ms. Jenkins is an environmental engineer with over 35 years' experience in air quality, contaminated site investigation and cleanup, and environmental compliance. She served as Environmental Director at Washington Department of Corrections for 5 years (which had at that time 15 prisons, 3 large quantity hazardous waste generators, 3 wastewater treatment plants, 7 wholly owned water systems, and a backlog of compliance issues). During that time, she and her team turned the agency into a model for environmental compliance, and developed a highly successful environmental sustainability program that saved the Department over $1 million in the first year of implementation, and more in the following years.

She has conducted many contaminated site investigations, remedial investigations, and feasibility studies, and prepared cleanup action plans, sampling and analysis plans, health and safety plans, and permit applications associated with site cleanups. She has stood in the trenches after petroleum spills and managed emergency cleanup efforts. She has also authored several highly technical, detailed permit applications for seven mixed nuclear-hazardous waste treatment and storage facilities at the Hanford Reservation. During one phase of her career, she conducted dozens of comprehensive environmental compliance inspections at federal facilities in several western and eastern states.

While employed at Washington Department of Ecology early in her career, Ms. Jenkins spearheaded the effort to control residential wood heating emissions, drafted the original legislation, and helped write the implementing regulations (WAC 173-433) after the bill was passed. She was also part of the team that wrote the MTCA regulations (WAC 173-340) after the Model Toxics Control Act was passed in 1989, and was responsible for developing the Washington Ranking Method for contaminated sites.

Ms. Jenkins currently consults on a variety of environmental projects, particularly where there are controversial issues. Because she has worked both for Ecology and for regulated entities, she has a practical approach to achieving the goals of environmental regulation and facing real-world issues that drive or influence projects and project owners.

Letter No. 15D

DNraffic CONSULTANTS
Transportation Engineers and Planners
PO Box 547
Preston, Washington 98050

Memorandum

Date: July 3, 2020

To: Monica Lowney
Snoqualmie Community Action Network (SCAN)

From: Gary A. Norris, PE, PTOE
DN Traffic Consultants, Inc.

Subject: Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

Re: Draft Environmental Impact Statement (DEIS)

The following memorandum was prepared to summarize my response to the Snoqualmie Mill PCI DEIS. I was retained by the Snoqualmie Community Action Network (SCAN) to address the traffic and transportation issues presented in the Draft Environmental Impact Statement (DEIS) dated April 2020. It was noted in the DEIS that our firm, DN Traffic Consultants, Inc. was identified as a contributor to the DEIS document. In fact, although I was involved in the initial discussions regarding the proposed scope of work, I made no contribution to the published Snoqualmie Mill PCI DEIS.

Qualifications

I am currently a Senior Engineer/Project Manager for DN Traffic Consultants, Inc.; a Registered Professional Engineer in Washington, Oregon, Idaho, Virginia, Rhode Island, Maryland, and the District of Columbia; and a licensed Professional Traffic Operations Engineer (PTOE) certified through the Institute of Transportation Engineers (ITE). My professional career has included a position with the City of Seattle Department of Transportation as an Assistant Transportation Planner; Long Range Transportation Engineer with the City of Bellevue Washington; Transportation System Manager for the City of Renton, Washington; and Public Works Director for the City of Edgewood, Washington. In each position, I was responsible for scoping, review, analysis, and development of mitigation measures for traffic impact analyses and environmental impact statements.

I have a Bachelor of Science in Civil Engineering – Traffic Engineering Emphasis and a Master of Science in Civil Engineering – Transportation Planning Emphasis. My master's thesis was entitled *Sub Area Transportation Planning: A Case Study of Bellevue, Washington*[1]. which was published in Traffic Quarterly. I have more than 45 years in the field of traffic engineering and transportation planning having prepared over 1000 traffic impact studies including a traffic study to move 7000 federal employees from the Pentagon to the Mark Center in Alexandria, Virginia. The study concluded with a presentation of our findings to Congress.

[1] Traffic Quarterly, Eno Foundation; October 1978.

After my time as a public agency official, I worked in the private sector as a project manager and senior engineer leading staff teams in the process of conducting traffic and transportation studies, safety reviews, developing transportation plans, and developing plans, specifications and cost estimates for transportation projects.

I am a member of the Institute of Transportation Engineers (ITE) and serve on the ITE Safety Council. I am currently the chair of the Washington State Section Safety Committee and responsible for developing the safety program for the annual Section program.

Background

The Snoqualmie Mill Planned Commercial/Industrial (PCI) is comprised of 1.85 million gross square feet of commercial and industrial uses to provide a substantial number of jobs, consistent with the historic use of the site as an employment center. The development is proposed to be completed in three planning areas over 15 years. In total, the PCI will include approximately 1.4 million gross square feet of Warehouse/Manufacturing; 96,000 gross square feet of Light Industrial; 82,000 gross square feet of Retail/Restaurant; 156,700 gross square feet of Office; 104,000 gross square feet of Residential; 2,000 gross square feet of Outdoor Performance Space; and a 15,000 gross square feet of Event Center. The first phase is expected to be complete and operational by 2023 with full development by 2032.

Although the Snoqualmie Mill Site was historically a major employment center in the Snoqualmie Valley, that has not been the case since 1989 when the sawmill closed, although the wood-finishing plant remained open until 2003. Since that time, the character of Snoqualmie has changed to suburban residential community with very little employment opportunities. With the changing of the land use, travel characteristics also changed. The existing traffic characteristics in the Snoqualmie Valley are not consistent with the land uses proposed for the Snoqualmie Mill Site PCI redevelopment. Therefore, it is not sufficient to simply apply historic growth rates and new trip generation to existing travel patterns. The analysis must reflect how the new traffic patterns will impact existing traffic flow. In the overall review, it is apparent the DEIS does not accomplish this objective. On the surface, it appears an extensive evaluation has been conducted to lead to an acceptable conclusion but upon further analysis it is discovered that is not the case and the DEIS requires a more rigorous analysis.

Issues

I offer the following comments and request the following additional analysis:

Traffic Counts

- Most of the turning movement counts (TMCs) are over two (2) years old. They were collected in January/February 2018. Traditionally, traffic counts used in a traffic impact analysis must be within one (1) year of the date of the analysis. In this case, the counts should have been collected between April 2019 and April 2020.

15D-1

- The TMC's were collected during the months of January and February, typically the months with the lowest observed traffic volumes. A review of the traffic count data[2] on SR 18 at I90 indicates the January volume is 26 percent lower than the average daily volume. The turning movement counts should either be redone or adjusted to reflect "average worse case" volumes as required by SEPA. The TMC counts should also identify peak volume conditions during the peak recreational scenarios on weekends. 15D-1
- The DEIS indicated the TMC's were collected during the AM (7:00 AM – 9:00 AM) and PM (4:00 PM – 6:00 PM) peak periods. However, there was no documentation to support the contention that these hours represent the actual peak periods in Snoqualmie.
- The DEIS failed to provide documentation of seven (7) day 24-hour tube counts at several locations throughout the study area to document the actual AM and PM peak periods, validate hourly variations in traffic flow on a daily basis, and travel patterns throughout the study area.

Proposed Action –

- The DEIS should conduct seven (7) day, 24-hour tube counts at selected locations within the study area to identify traffic flow patterns including average and peak weekday and weekend volumes, peak hours on average weekdays and weekends. These counts should be used to document the peak hours, provide a basis for weekend traffic counts and analysis.
- The DEIS should conduct peak period TMC traffic counts to represent current traffic volumes (within one year of the date of the DEIS). Traffic counts should not reflect volumes under COVID 19.
- Traffic volumes presented in the DEIS should be updated to reflect "average worse case" conditions" as required by SEPA not the low volume scenario.

Traffic Forecasts

- **Trip Generation**
  - Trip generation used in the DEIS reflects vehicle trips identified in the 10th Edition of the Institute of Transportation Engineers, Trip Generation Report. The trip generation rates are based on studies done across the US. These trip generation rates have assumed transit usage and auto occupancy rates which are not necessarily representative of trip generation rates in the Snoqualmie Valley.
  - Trip generation rates should reflect person trips not just vehicle trips. Trip generation rates should consider pedestrians, bicycles, and transit ridership. This is not possible with the use of vehicular generation rates. The trip generation analysis should be revised to provide person trips rather than vehicular trips. The person trips can then be used to provide and assessment of pedestrian, bicycle, and transit impacts. 15D-2
  - The DEIS fails to provide a trip generation estimate for recreational or summer traffic volumes. The DEIS fails to provide an assessment of the impact of the Snoqualmie Mill Site on summer/recreational traffic.
  - The DEIS fails to document the estimated trip generation associated with construction activity. In many cases, construction traffic exceeds the volumes anticipated under full development of the project. The DEIS fails to provide any estimate of construction traffic volumes.
  - Exhibit 1.4-1 summarizes the "Snoqualmie Mill Development Plan" for each of the three (3) Planning Areas. As an example, in the Exhibit, Planning Area 1 includes Warehouse (280,000 gsf); Light Industrial (120,000 gsf); Retail/Restaurant (70,000 gsf); Residential (Mixed-Use) (134,000

[2] WSDOT Annual Traffic Report, 2016; Count Station S838.

gsf) and Office/Campus (0 gsf) for a total of 604,000 gross square feet. According to the Exhibit footnotes, the categories are further stratified into15,000 gsf of restaurant, 49,000 gsf of specialty retail, and 31,000 gsf of indoor event space. In contrast, the trip generation estimate[3] provided by the traffic consultant only includes "Industrial Park", "Shopping Center", and Multifamily Housing (Low Rise). None of the trip generation rates for these land use categories address the land-uses identified in Exhibit 1.4-1. By this fact alone, the Transportation Section for the DEIS is fundamentally flawed.

- The NCHRP 8-51 tool is believed to substantially overestimate the internal trip capture rates (46 and 42%) for the multi-family land use for this project. Use of the suggested refinement of the PSRC model would be a much more reliable predictor as it considers all the significant factors in a competing attraction modeled environment. 15D-2
- The DEIS has erroneously applied a "pass by" trip reduction of 34 percent, or 1513 daily trips, for the shopping center. First as stated above, there is no "shopping center" identified in the Snoqualmie Mill Site plan consistent with the definition provided for the ITE Trip Generation identified in Planning Area 1. Secondly, pass-by trips are defined as "trips made as intermediate stops on the way from an origin to a primary trip destination with-out a route diversion". By this definition, the only credit allowed would be for trips already using the site access roadways and would stop at the proposed "shopping center" on their way in or out of the Snoqualmie Mill Site. This means that a pass-by trip would come from the Snoqualmie Mill Site internal road network. The applied reduction for pass by trips is not consistent with the ITE Trip Generation Manual (Table 5.6). The Manual suggests application of the 34 percent reduction would be supported by daily volume on the adjacent street which range between 25,000 vehicles per day and 73,000 vehicles per day. Although there are no traffic volumes provided in the DEIS for the internal roadway network, the daily trip generation estimated for the entire site was only 5,768 vehicles, significantly less than the minimum adjacent street volume for the 34 percent pass by deduction suggested in the DEIS. Furthermore, the daily volume on Railroad Avenue is approximately 8,970 vehicles per day (vpd)[4], again significantly below 25,000 vpd necessary to support a 34 percent pass by reduction.
- The analysis failed to include any "pipeline" (other development proposals already in the "pipeline" prior to the horizon year of the Snoqualmie Mill Site) projects in the No Action forecast.

Proposed Action –

- Revise trip generation calculations to accurately reflect proposed site uses;
- Prepare trip generation to represent person trips; apply reasonable mode split and auto occupancy rates to develop vehicular, transit, pedestrian, and bicycle trips;
- Prepare trip generation estimates to reflect summer and recreation traffic patterns;
- Prepare trip generation to reflect expected construction activity
- Delete trip reductions for pass-by traffic as the values are not consistent with the traffic patterns in the Snoqualmie Valley.

- **Trip Distribution Analysis for the Proposed Snoqualmie Mill Development[5]**
  - Background Traffic Growth 15D-3

[3] Snoqualmie Mill Trip Generation Estimate (Planning Area 1); Appendix E4; Trip Generation Calculations
[4] Daily volume derived from PM peak hour TMC at the SR202 (Railroad Avenue) (522EB +375WB)/10% = 8970
[5] Draft Memorandum; From Emily Gerhart et al; Fehr and Peers to Mark Hofman; City of Snoqualmie; August 7, 2018.

- Phase 1 Buildout is identified as (2020). Elsewhere in the DEIS Phase 1 Buildout is referred to as 2023. This is obviously an error.
- Background traffic growth was estimated by applying a 1% annual growth rate to the existing network peak hour volumes except for Snoqualmie Parkway, which used a 0.5% annual growth rate. This background growth rate is not supported by a technical analysis and appears in direct contradiction to Snoqualmie's seven-year population growth rate of 3.4% per year[6].

- 2020 is phase 1 buildout for Multi Family, Industrial Park and Shopping Center. This is way too aggressive. To address this concern, the DEIS requires a traditional market analysis to support the developer's absorption assumptions. If the developer's rosy assumptions are not realized the City will be left holding the bag to fund the infrastructure commitments. As with Ten Trails in Black Diamond, the absorption forecasts used for office and commercial development are likely off by 10 to 15 years. As a result, the growth in background traffic absorbs the system capacity and the proposed developer mitigation improvements become inadequate to meet the required level of service. 15D-3
- The 2032 horizon year should also be adjusted, as well, as the substantial office construction on the eastside will compete with the Snoqualmie Mill Site project.
  - Microsoft backed off their Issaquah plans a few years ago choosing to focus on Redmond and Bellevue.
  - Other than the tech industry, standard office development is expected to be on the decline partly because of Covid 19 and the realization that much of our white-collar office activity does not require a continual physical presence.
  - It is important for the City to understand the true potential here before investing political and economic capital. The City should have a foundational understanding of what industries and office type users have indicated an interest in this development?
- The traffic forecasting process used in this analysis provides a "gross" estimate of future volumes. A more refined and credible process is required to substantiate the DEIS.
  - The Consultant used compound growth rates to estimate future traffic volumes on the study area roadway network rather than developing a subarea traffic model with zone splits and network refinement of the PSRC model. The Snoqualmie Mill Site proposal is large enough to support such a process which would have provided better overall results.
  - The Consultant suggested the employee travel characteristics for the Snoqualmie Mill Site would be similar to the cities of Redmond, Woodinville, Dupont, and Canyon Park. There was no discussion on how these communities relate to the Snoqualmie Mill Site. The communities of Redmond, Woodinville, Dupont, and Canyon Park are significantly different than Snoqualmie. Each of these communities is served by a major regional freeway immediately adjacent to the industrial/office park complex whereas the Snoqualmie Mill Site is several miles from I-90. It is not a reasonable comparison. 15D-4
  - Development of a subarea model from the PSRC regional model would not require "adjustments" to the trip distribution model as performed by Fehr and Peers, as the regional model accounts for competing attractions in a much more efficient and analytical way than planners making educated guesses.
  - The model should reflect the housing location of Snoqualmie Mill Site employees.

Proposed Action –

[6] Snoqualmie Mill PCI Plan Draft EIS; Section 3.8.1 Affected Environment; page 3-195; pp 1.

- Create a subarea model from the PRSC model with a refined zone and network structure to forecast reasonably documented future traffic volumes without the use of assignment factors based on application of national data which has no relation to conditions in the Snoqualmie Valley
- Use the model to accurately project future volumes without factoring existing peak hour volumes based on unrealistic and unverified traffic growth estimates.
- The model should reflect

15D-4

Pedestrian/Bicycle Impacts (Active Transportation)

- The DEIS failed to provide an estimate of trip generation for bicycles and pedestrians;
- The DEIS failed to explore the potential to reduce vehicular traffic through the provision of incentives for bicycle and pedestrian to encourage mode shift;
- The DEIS failed to identify potential bicycle and pedestrian routings from the Snoqualmie Mill Site to major traffic generators such as Snoqualmie Ridge.

15D-5

Proposed Action –

- Prepare an estimate of pedestrian and bicycle trip generation;
- Identify potential routings/connections from the site to Snoqualmie trail network.
- Connect site to major trail facilities within the Snoqualmie Mill Site study area

Safety Impacts

- The DEIS discusses the safety issues relevant to the Snoqualmie Mill Site in a general fashion.
  - The DEIS identifies the 5-year crash history with identification of crash types.
  - The DEIS fails to identify the potential for additional crashes with the addition of project traffic.
  - It is logical to expect an increase in overall crashes as traffic volumes increase. The DEIS failed to identify mitigation measures which would keep crash volumes from increasing or possibly eliminating them through the application procedures identified in the HSM[7] and application of Crash Modification Factors (CMF's).
- The DEIS failed to identify measures to address the goals of Target Zero, the Washington State Strategic Highway Safety Plan[8] aimed at eliminating fatal and serious crashes in the Snoqualmie Valley.

15D-6

Proposed Action –

- Prepare a summary of the crash history at each study area intersection;
- Estimate potential for additional crashes with additional Snoqualmie Mill Site traffic;
- Identify high crash types at each intersection;
- Identify crash modification factors to resolve key crash types and eliminate the potential for additional;
- Use systemic factors to identify potential significant crash locations throughout the study area.
- Prepare Road Safety Plan to address systemic crash locations throughout the study area.

[7] Highway Safety Manual (HSM);
[8] Target Zero; Washington State Strategic Highway Safety Plan; 2019.

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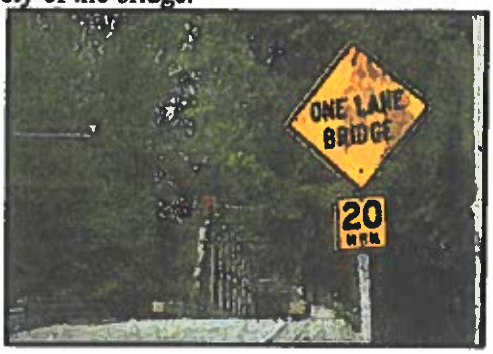
Additional Traffic on Bridges



- The DEIS failed to address the impact of project generated traffic on Snoqualmie Valley Bridges particularly the Railroad Avenue Bridge and the Meadowbrook Bridge.
- During previous studies, the WSDOT expressed concern about the potential for traffic volumes to queue on the Railroad Bridge under proposed signal operation of the Mill Pond Road/Railroad Avenue intersection. This led to the requirement by WSDOT to construct a roundabout at this location.

15D-7

- Railroad Avenue Bridge
  - DEIS identified 47 percent of the project generated PM peak hour trips will use the Railroad Avenue Bridge.
  - A recent Bridge Inspection Report[9] highlighted the maintenance needs of the Railroad Avenue (SR 202) bridge. The study of the Railroad Bridge showed failure of the bridge supports. Pictures illustrated bridge trusses that had failed; rusted bolts; lower strut bends; bend and tear in the lower strut of the portal frame; a gap at the end of the timber sidewalk; exfoliation and exposed rebar; deck spalling at sliding plate joint in soffit; peeling paint; utility bracket missing bolt; broken hangar rods; and a 10" diameter utility which has an air vacuum valve leaking sewage.
  - A copy of the report is attached. An updated study of the bridge should be performed to determine current condition and what needs to be done to ensure safety of the bridge.
- Meadowbrook Bridge
  - The DEIS identified 13 percent of the project generated PM peak hour trips would use the Meadowbrook Bridge.
  - The DEIS erroneously analyzed the Meadowbrook Bridge as a two-lane signal-controlled intersection. The bridge is in fact a single lane bridge and requires a special approach to the analysis which considers the capacity constraints of the bridge.
  - The Meadowbrook Bridge is identified as historical landmark and therefore must be maintained.
  - Bridge was built in 1922 and recently annexed into the City of Snoqualmie.
  - Maintenance work in 2005 included widening of the approach spans with concrete trusses.
  - A recent structural analysis of the bridge[10], the report offered some significant findings:
    - Span 4 – Diagonal East – Buckling near the top chord
    - Span 4 – Diagonal East – Buckling near rail with a slight twist
    - Span 4 – Vertical East - 1.5 of 8 flanges rusted away near lower chord
    - Span 4 – Diagonal West – Upper portion is buckled ½" over the length
    - Span 4 – Vertical West – Plate between angles has rusted through hole



[9] Bridge Inspection Report; Snoqualmie River Bridge; WSDOT; 11/8/2018. A copy of report is attached.
[10] Bridge Inspection Report; Meadowbrook Bridge; April 2020.

- Span 4 – Diagonal West – ½" buckling up, down, east and west, over the length
- Conclusion is the bridge needs significant structural improvement
- A subsequent Fracture Critical Inspection Report should be conducted, and necessary repairs made before any additional traffic should be allowed on the bridge.

A copy of the Meadowbrook Bridge Inspection Report and Fracture Critical Inspection Report is included in the Technical Appendix.

Proposed Action –

- Prepare an update to the previous Railroad Avenue Bridge Inspection Report. Report should identify repair needs of the bridge. Recommended maintenance repairs should be completed prior to issuing permits, including clearing and grading, for the first phase of the Snoqualmie Mill Site PCI; 15D-7
- A similar Bridge Inspection Report should be prepared for the Meadowbrook Bridge. All recommended maintenance repairs should be completed prior to issuing permits, including clearing and grading, for the first phase of the project.
- Level of service should be redone reflecting the single lane nature of the bridge rather than a two-lane analysis.
- Identify crash modification factors to resolve key crashes;
- Use systemic factors to identify potential significant crash location throughout the study area.

Construction Impacts

- The DEIS fails to completely identify, analyze, and mitigate the impacts of construction activity on the study area roadways and intersections.
- Traffic generated during construction can be more significant than full development and occupancy of the site.
- Dump trucks with pups have a gross vehicular weight of approximately 105,000 pounds. It is estimated this load has the same relative pavement impact as 9,600 passenger vehicles[11].

Proposed Action –

- The DEIS should develop an analysis of construction impacts to include: 15D-8
  - Identification of potential construction haul routes;
  - Trip Generation/Trip distribution/traffic assignment to identified haul routes and other impacted routes
  - Level of service analysis at impacted intersections
  - Identify mitigation to address impacted intersections during critical peak hours
- The DEIS should identify potential haul routes and evaluate pavement condition. Mitigation measures should be identified to restore the pavement after construction.

Impact to Regional Transportation System

- The DEIS fails to address the traffic related impacts to the regional transportation system
  - The DEIS traffic assignment allocates 20 percent of the project generated traffic to the northwest of the site, yet there is no level of service evaluation within the DEIS of any intersection on SR 202 or SR 203 north and west of the site. 15D-9

11

- The DEIS fails to discuss the potential for traffic diversion through the valley. Currently, congestion at the at I-90/SR 18 forces traffic to divert to other routes for access to I-90 including Exit 22 – Preston/Fall City, Exit 27 – Snoqualmie/North Bend and Exit 31 in North Bend. The analysis should identify the potential for traffic to divert to alternative routes.
- The DEIS fails to recognize the failing condition of the regional roadway network serving the site. The south bound lane on SR 203 north of Carnation has completely failed and the roadway is limited to one lane with signal control.
- SR 18/I-90 – the DEIS in general presents an acceptable level of service during the AM and PM peak at this intersection with the exception of the LOS F during the AM Peak at the I-90 WB ramps. This represents an unrealistic presentation of the facts. The ramp intersections are currently experiencing two to three-mile queues on I-90 on approach to these intersections. Similar queues also exist on SR 18 on approach to the intersection. This has led to fatal crashes and extensive delays on the corridor. WSDOT has installed ramp metering and added a designated east bound right turn lane which simply moved to the queue further down the ramp. The simple single intersection approach to the LOS analysis presents an overly optimistic evaluation and does not reflect real-time traffic operations through this interchange. The DEIS should present a more thorough review of the existing operation including queuing in addition to simply present a level of service. 15D-9
- SR 18/I-90 – the DEIS uses the result of the IJR Addendum to reflect LOS with the proposed interchange improvements. The IJR states the interchange would operate at an acceptable level of service but provides no value. The proposed construction of the interchange is labelled as "tentative", as such, the DEIS should provide an evaluation of the level of service and queuing if the interchange improvements are not in place by the time the proposed development is fully occupied.
- The interchange currently experiences significant tractor/semi-trailer parking during nighttime hours. This results from a lack of parking supply for interstate trucking operations. These rigs use the shoulder of all interchanges west of Snoqualmie pass to Issaquah. The DEIS should document current parking demand and off solutions as related to the impact of trucking activity generated by the Snoqualmie Mill Site.

Proposed Action –

- Conduct level of service at all regional intersections impacted by 10 or more AM or PM peak hour trips;
- Calculate the potential for traffic diversion from SR 18/I90 interchange to alternative routes;
- In addition to a LOS analysis, the DEIS should conduct a thorough evaluation of traffic flow through the I-90/SR 18 interchange including a micro simulation model to appropriately analyze queuing on all approaches.
- Document existing parking demand for tractor/trailer rigs during the evening and nighttime hours. Present mitigation to ensure trucks related to the Snoqualmie Mill Site operation will not be forced to park along the I-90 corridor.
- Conduct a road audit for all regional roadways serving 10 or more trips. Audit to identify pavement condition, compliance with current road standard, and pavement condition.

- **Transit Service**
  - The DEIS fails to identify existing transit ridership and capacity of existing routes to address additional ridership
  - The DEIS fails to identify potential site generated transit ridership 15D-10
  - The DEIS fails to identify potential transit service to the site.

- The DEIS identifies an existing park and ride lot but fails to document existing demand and available capacity
- The DEIS fails to document potential park and ride use by the PCI development

15D-10

Proposed Action –

- Calculate potential for site generated transit trips
- Identify measures to facilitate transit ridership
- Determine park and ride lot demand and available capacity

Road Conditions







The regional roadway network serving the site is in a state of disrepair and in some cases failing.

- The DEIS identified several roadways impacted by additional traffic generated by the proposed Snoqualmie Mill Site Development. These roadways include SR 202 (Railroad Avenue); SR 203; SE Reinig Road; Meadowbrook Way SE and 428th Avenue SE. As shown in the picture, Reinig Road east of the site, experiences water over the roadway as documented by this warning sign. The pavement on these roads is in poor condition. In some cases, the pavement has failed.

15D-11

- The roadways do not meet current road standards. The roads have relatively high-speed limits with fixed objects immediately adjacent to the travel way. There are no shoulders for pedestrians or bicycles.

- The roadways are not designed to accommodate large trucks in competition with pedestrians and bicycles. There are no shoulders





along the road. Weight limits are posted to protect the pavement. The roadways are unable to accommodate heavy vehicles.





- SR 203 north of Carnation has only one lane because of a slide which closed the southbound lane. Currently the roadway is operating with one lane to serve both directions. Traffic is controlled by a signal placed at each end. 15D-11



Proposed Action –

- DEIS should conduct a road audit of every road serving the Snoqualmie Mill Site which is impact by 10 or more peak hour trips. The audit should evaluate consistency with King County/WSDOT Road Standards to address project traffic loadings and pavement condition.
- DEIS should document failure history of the roadway and flooding potential.



Funding

- The DEIS speaks in general terms about required funding for necessary projects. More specification should be provided to document how the necessary projects will be funded.
- If an infrastructure improvement is necessary to provide an acceptable level of service in the Snoqualmie Mill Site development horizon;
  - Funding should be committed and secured prior to permitting development
  - If public funds are unavailable the developer should bond for the cost of the improvement prior to permitting development.

15D-12

Conclusions

The DEIS for the Snoqualmie Mill Site PCI proposal fails to adequately address the traffic and transportation related impacts of the proposed Snoqualmie Mill Site PCI project. In general, the DEIS highlights many of the issues, but fails to do the in-depth analysis necessary to understand the impact of the proposed action. The DEIS analysis has attempted to apply national data to analyze the conditions when local data is available and would better represent the Snoqualmie Mill Site project and the environment in which it is placed. The DEIS should be redone to provide a significant and in-depth analysis of the project traffic impacts.

15D-1 - 15D-12

Traffic counts are outdated and were collected at times when volumes are typically significantly (25 %) lower than the average volume condition. The trip generation analysis does not represent the land uses identified as the "Proposed Action" which invalidates the entire traffic evaluation. The DEIS focused on vehicular trip generation rather than person trips. As such, the trip generation rates were based on studies which employed auto occupancy and mode split values different than those appropriate for the Snoqualmie Mill Site. The analysis employed compound growth factors, without justification, which did not match recent historical growth on the study area network. The modeling process used the gross PSRC model adjusted by national factors, again which have no relevance to the Snoqualmie Valley, when a more appropriate approach would be to create a subarea model through subarea refinements, to the network and zone structure, of the PSRC which would reflect more accurately the traffic characteristics of the Snoqualmie Valley.

The study failed to sufficiently address the traffic related issues associated with the anticipated construction. The impact of construction traffic is significant on roadway capacity and the impact on pavement. These conditions should be known and understood as part of the DEIS process. The Applicant should be encumbered with the cost of improving the pavement after construction. The cost could range from resurfacing through an overlay or complete reconstruction of the road if the pavement fails.

The DEIS did not explore the potential to reduce vehicular traffic through provisions for transit, bicycle, and pedestrian improvements. The DEIS failed to evaluate the potential for transit to reduce vehicular impact. Existing transit routes and service were not identified. Potential transit service to the site was not discussed. Potential incentives to encourage transit ridership were not explored. 15D-1 - 15D-12

The analysis failed to address the impact of the additional traffic loadings on substandard study area bridges. The DEIS erroneously evaluated level of service on the Meadowbrook Bridge as a two-lane bridge when in fact it is a single lane. Both the Railroad Avenue and Meadow Brook Bridges are in varying states of disrepair. The Applicant should be required to bring the bridges to a state of "good repair" before the development can proceed.

The DEIS failed to explore the impact of the proposed Snoqualmie Mill Site generated traffic on regional roadways. Twenty percent of project generated traffic was assigned northwest of the site with no evaluation of level of service at critical intersection on SR 202 and SR 203. The DEIS should evaluate all intersections impacted by 10 or more PM peak hour trips.

The DEIS did not consider the ability of the existing roadway network to accommodate additional traffic. Road conditions, pavement failure, substandard cross sections were not identified or discussed. The DEIS should document the pavement condition of regional network anticipated to serve the Snoqualmie Mill Site.

The project should not be allowed to proceed until funding is secured for all improvements necessary to provide an acceptable level of service. If public funds are not available, the Snoqualmie Mill Site project should provide a bond for the cost to construct these improvements.

The Snoqualmie Mill Site PCI DEIS fails to meet the minimum requirements of a legitimate analysis of the impact of the proposal on the Transportation system and should be redone.

TECHNICAL APPENDIX

SNOQUALMIE RIVER BRIDGE

(RAILROAD AVENUE)

BRIDGE INSPECTION REPORT

Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-be53-d9497c5e2678 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID** 0001460A **Br. Name** SNOQUALMIE RIVER

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

BI-66

0 Orientation

Photo Type: D - Deck

Orientation: E

Date: 9/2/2014

Repairs:

Deck looking east.



BI-67

0 Orientation

Photo Type: E - Elevation

Orientation: N

Date: 9/2/2014

Repairs:

Elevation looking north.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-ba53-d9497c6a2678 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.60

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-95

0 Orientation

Photo Type: R - Repair

Orientation: DN

Date: 9/14/2016

Repairs: 12627

Sign on north rail has loose bolts.



MI-48

110 Concrete Girder

Photo Type: G - General

Orientation: S

Date: 12/8/2003

Repairs:

Girder 4A at Column 5A.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a03-be59-d9497c5e2676 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

MI-38

113 Steel Stringer

Photo Type: G - General

Orientation: SW

Date: 5/31/2009

Repairs:

Typical stringer rust, Stringer 2F at Floorbeam 1 shown.



SI-47

128 Steel Thru Truss

Photo Type: R - Repair

Orientation: NE

Date: 9/16/2014

Repairs: 12528

West Portal damage showing the cracked angle at the gusset plate



Status: Released | Printed On: 6/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-ba53-d9497a5a2978 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-65

126 Steel Thru Truss

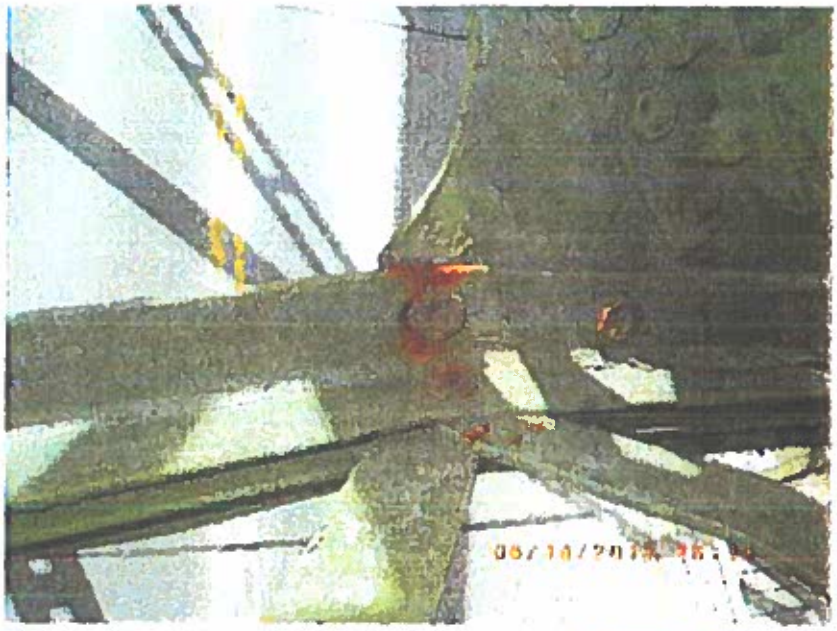
Photo Type: R - Repair

Orientation: E

Date: 5/15/2014

Repairs: 12526

West Portal damage showing a cracked angle at the gusset plate.



SI-77

126 Steel Thru Truss

Photo Type: R - Repair

Orientation: W

Date: 5/15/2014

Repairs: 12526

West Portal over the eastbound lane showing the bend in the lower angle assembly of the portal strut.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-ba53-d9497c5a2676 | Release Date: 11/8/2019 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID** 0001460A **Br. Name** SNOQUALMIE RIVER

Carrying SR 202 **Route On** 00202 **Mile Post** 28.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

MI-13

126 Steel Thru Truss

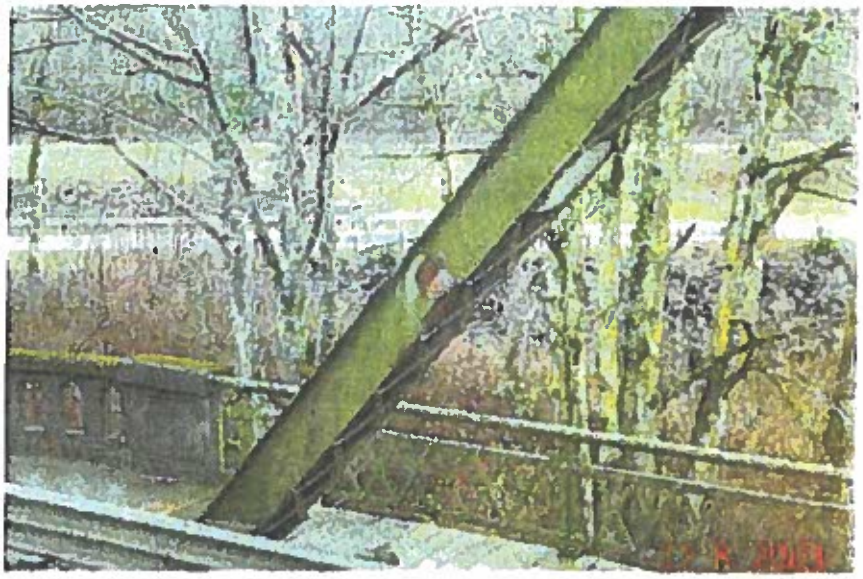
Photo Type: G - General

Orientation: S

Date: 12/8/2003

Repairs:

Member L11-U10 (south truss) looking south.



SI-60

126 Steel Thru Truss

Photo Type: R - Repair

Orientation: W

Date: 5/15/2014

Repairs: 12526

East Portal over the eastbound lane has a lower strut bend of 3/4" over 24"



Status: Released | Printed On: 9/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-ba53-d9497c5a2678 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

81-81

126 Steel Thru Truss

Photo Type: R - Repair

Orientation: W

Date: 5/15/2014

Repairs: 12529

East Portal over the westbound lane showing a bend and tear in the lower strut of the portal frame.



81-86

126 Steel Thru Truss

Photo Type: R - Repair

Orientation: E

Date: 5/15/2014

Repairs: 12529

East Portal over the westbound lane showing a bend and tear in the lower strut of the portal frame.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: a0f85d4e-b7dd-4e93-be53-d9497c5a2676 | Release Date: 11/8/2013 | Program Mgr: Evan M Grimm

Br. No. 202/50 | SID 0001460A | Br. Name SNOQUALMIE RIVER

Carrying SR 202 | Route On 00202 | Mile Post 26.00

Intersecting SNOQUALMIE RIVER | Route Under | Mile Post

SI-44

126 Steel Thru Truss

Photo Type: G - General

Orientation: NE

Date: 9/11/2012

Repairs:

Near L3, Member U2L3 south has been butt welded.



MI-44

152 Steel Floor Beam

Photo Type: G - General

Orientation: W

Date: 12/8/2003

Repairs:

Typical floorbeam rust, Floorbeam 1 shown.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4e03-be53-d9497c5a2676 | Release Date: 11/6/2018 | Program Mgr: Elsie M Grimm

Br. No. 202/60 **BID** 0001460A **Br. Name** SNOQUALMIE RIVER

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

S1-05

264 Timber Sidewalk & Supports

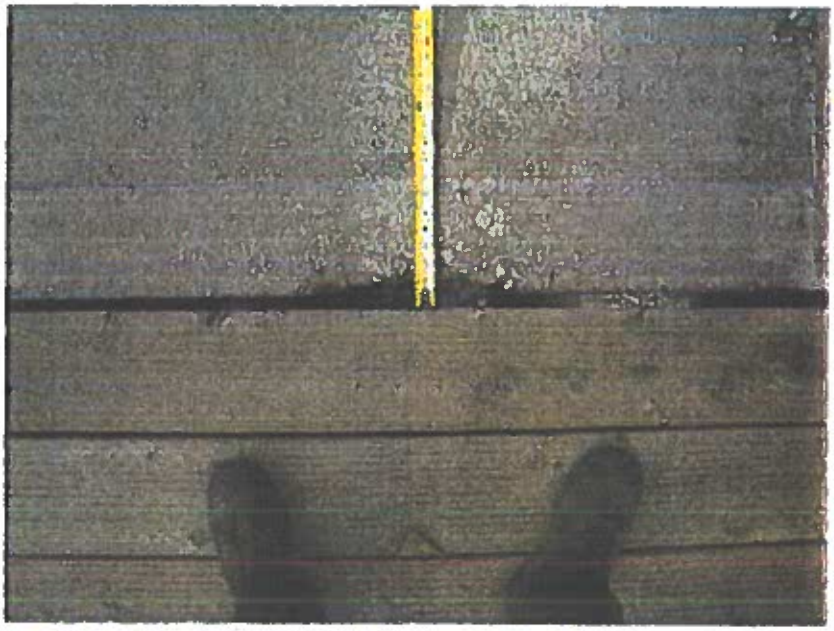
Photo Type: R - Repair

Orientation: DN

Date: 9/14/2016

Repairs: 12510

There is a gap at the end of the timber sidewalk in the NW corner.



S1-104

264 Timber Sidewalk & Supports

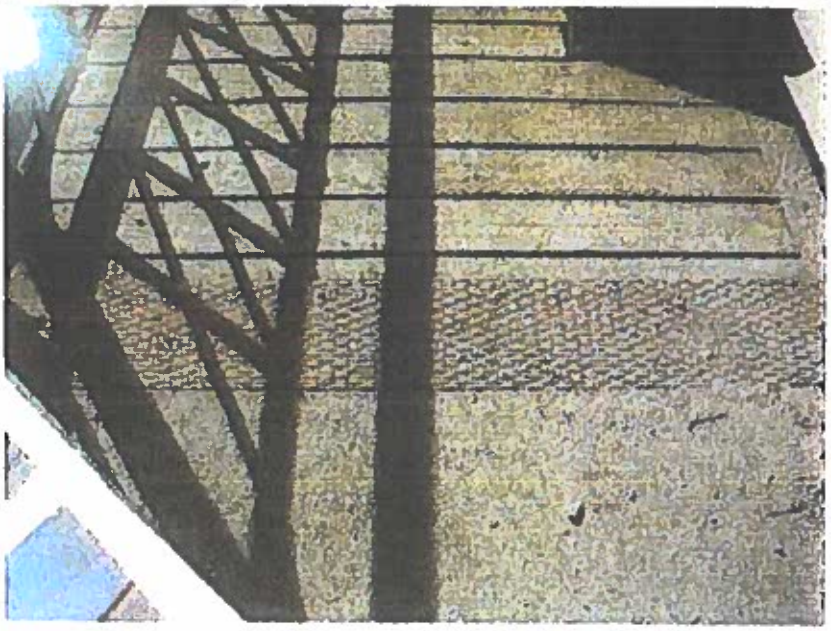
Photo Type: C - Completed

Orientation: E

Date: 9/16/2016

Repairs: 12535

At the NW corner, a steel plate has been placed to cover a gap in the timber sidewalk.



Status: Released | Printed On: 6/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-be53-d9497c5e2676 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001450A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On 00202** **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-31

311 Moveable Bearing (roller, sliding, etc)

Photo Type: M - Monitor

Orientation: N

Date: 8/2/2014

Repairs: 12511

Tilt motor location for measurement.



MI-21

330 Metal Bridge Railing

Photo Type: R - Repair

Orientation: S

Date: 12/6/2003

Repairs: 12508

Bridge rail mount between north LT-L8.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: a0f83d4a-b7dd-4a93-ba51-d9497c5a2678 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 28.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

81-87

341 Concrete Pedestrian Railing

Photo Type: G - General

Orientation: E

Date: 9/14/2018

Repairs:

Exfoliation and exposed rebar at the NW corner.



81-88

361 Scour

Photo Type: S - Scour

Orientation: W

Date: 9/2/2010

Repairs:

Riprap at Pier 3.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4e03-ba58-d9497c5a2676 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-81

409 Steel Sliding Plate w-Raised Bars

Photo Type: G - General

Orientation: UP

Date: 9/11/2012

Repairs:

Desk spalling at sliding plate joint in soffit.



MI-84

901 Red Lead Alkyd Paint System

Photo Type: G - General

Orientation: W

Date: 12/9/2003

Repairs:

Typical paint condition, L11-U10 North is shown.



Status: Released | Printed On: 6/21/2020 | Agency: Washington State

CD Guid: e0f83b4a-b7dd-4a93-ba53-d9497c5a2876 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **BID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On 00202** **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-84

901 Red Lead Alkyd Paint System

Photo Type: G - General

Orientation: E

Date: 8/2/2014

Repairs:

Typical paint condition in the top chord.



SI-491

1677 Channel Protection

Photo Type: S - Scour

Orientation: S

Date: 9/18/2018

Repairs:

Downstream photo.



Status: Released | Printed On: 8/21/2020 | Agency: Washington State

CD Guid: a0f88d4a-b7dd-4a93-ba53-d9497c5a2676 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On 00202** **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-102

1677 Channel Protection

Photo Type: S - Scour

Orientation: N

Date: 9/15/2018

Repairs:

Upstream photo.



SI-99

1665 Transitions

Photo Type: J - Reg Road Maint

Orientation: W

Date: 9/14/2016

Repairs: 12529

Minor damage to rail and posts at NE corner.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-ba53-d9497c6a2678 | Release Date: 11/5/2019 | Program Mgr: Evan M Grimm

Br. No. 202/60 **BID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-01

2975 No. of Utilities

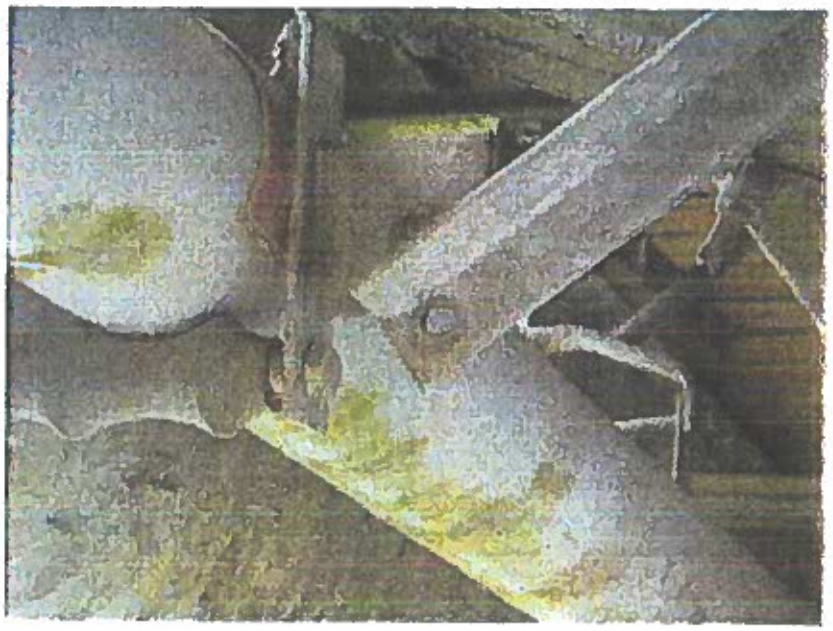
Photo Type: U - Utility

Orientation: W

Date: 6/10/2008

Repairs: 12510

Utility bracket missing bolt on south side at L4.



SI-03

2975 No. of Utilities

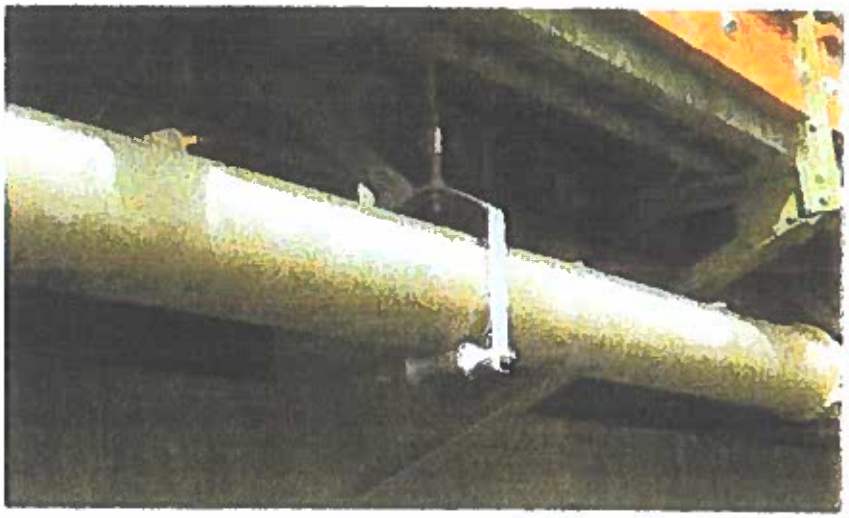
Photo Type: U - Utility

Orientation: SW

Date: 9/2/2014

Repairs: 12510

North 10" diameter utility with broken hanger rod near L4.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: a0f83d4e-b7dd-4e93-be58-d9497c5e2676 | Release Date: 11/8/2016 | Program Mgr: Brian M Grimm

Br. No. 202/60 **SID** 0001480A **Br. Name** SNOQUALMIE RIVER

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-100

2675 No. of Utilities

Photo Type: U - Utility

Orientation: SE

Date: 9/14/2016

Repairs: 12539

North 10" diameter utility has air vacuum valve leaking sewage.



SI-103

2675 No. of Utilities

Photo Type: C - Completed

Orientation: W

Date: 9/16/2016

Repairs: 12539

Utility air vacuum valve leak has been repaired.



Status: Released | Printed On: 8/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-be58-d9497c5e2678 | Release Date: 11/8/2016 | Program Mgr: Evan M Grimm

Br. No. 202/60 **SID 0061480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On 00202** **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

SI-02

2076 No. of Utilities

Photo Type: U - Utility

Orientation: E

Date: 9/2/2014

Repairs: 12510

North 6" diameter utility with broken hanger at the east abutment.



Status: Released | Printed On: 5/21/2020 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-be53-d9497c5e2876 | Release Date: 11/8/2018 | Program Mgr: Evan M Grimm

Br. No. 202/60 **BID** 0001460A **Br. Name** SNOQUALMIE RIVER

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Entry Name	Feildr Name	Type	Repairs	Page
SI-66	0 Orientation	D		1
SI-67	0 Orientation	E		1
SI-65	0 Orientation	R	12527	2
MI-16	110 Concrete Girder	G		2
MI-38	113 Steel Stringer	G		3
SI-67	128 Steel Thru Truss	R	12526	3
SI-65	128 Steel Thru Truss	R	12526	4
SI-77	128 Steel Thru Truss	R	12526	4
MI-13	128 Steel Thru Truss	G		5
SI-60	128 Steel Thru Truss	R	12526	5
SI-61	128 Steel Thru Truss	R	12526	6
SI-65	128 Steel Thru Truss	R	12526	6
SI-64	128 Steel Thru Truss	G		7
MI-14	152 Steel Floor Beam	G		7
SI-93	284 Timber Sidewalk & Supports	R	12530	8
SI-104	284 Timber Sidewalk & Supports	C	12530	8
SI-91	311 Moveable Bearing (roller, sliding, etc)	M	12511	9
MI-21	330 Metal Bridge Railing	R	12506	9
SI-97	341 Concrete Pedestrian Railing	G		10
SI-55	361 Scour	S		10
SI-61	409 Steel Riding Plate w-Raised Bars	G		11
MI-24	901 Red Lead Alkyd Paint System	G		11
SI-94	901 Red Lead Alkyd Paint System	G		12
SI-101	1677 Channel Protection	S		12
SI-102	1677 Channel Protection	S		13
SI-99	1685 Transitions	J	12528	13
SI-51	2675 No. of Utilities	U	12510	14
SI-63	2675 No. of Utilities	U	12510	14
SI-100	2675 No. of Utilities	U	12529	15
SI-103	2675 No. of Utilities	C	12529	15
SI-62	2675 No. of Utilities	U	12510	16

MEADOWBROOK BRIDGE

BRIDGE INSPECTION REPORT

Status: Lock | Printed On: 8/4/2020 | Agency: SNOQUALMIE

CD Guid: dbeab63a-3480-49c1-8aef-1b6fce76cdb4 | Release Date: | Program Mgr: Roman G. Peralta

Br. No. 1726A **SID** 08435700 **Br. Name** MEADOWBROOK BR

Carrying MEADOWBROOK WAY SE **Route On** 87430 **Mile Post** 1.28

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Inspector's Signature MAG Cert # Q1103 Cert Exp Date 5/12/2021 Co-inspector's Signature

4		Structural Eval	(1567)	73		Operating Tons	(1652)	0		No Utilities	(2675)
2		Deck Geometry	(1658)			Op RF	(1653)	1		Bridge Rails	(1684)
9		Underclearance	(1659)	44		Inventory Tons	(1655)	1		Transition	(1685)
8		Alignment	(1661)			Inv RF	(1656)	1		Guardrails	(1686)
7		Deck Overall	(1663)	5		Operating Level	(1660)	0		Terminals	(1687)
4		Superstructure	(1671)	A		Open/Closed	(1293)	0.00		Asphalt Depth	(2610)
6		Substructure	(1676)	8		Waterway	(1662)	6.00		Design Curb Ht	(2611)
6		Culvert	(1675)	5		Scour	(1680)	33.0		Bridge Rail Ht	(2612)
6		Chan/Protection	(1677)			Soundings Flag	(2693)	1921		Year Built	(1332)
N		Pier/Abut/Prot	(1678)	Y		Revise Rating	(2668)	2005		Year Rebuilt	(1336)
9		Drain Cond	(7664)			Photos Flag	(2691)	Y		Subj to NBIS	(2614)
0		Drain Status	(7665)			Measure Clrns	(2694)				
N		Deck Scaling	(7668)	6		Sdwk Cond	(7673)	Alpha Span Type:			
0		Scaling Pct	(7667)	7		Paint Cond	(7674)	STrus			
6		Deck Rutting	(7669)	6		Approach Cond	(7681)				
6		Exposed Rebar	(7670)	7		Retaining Wall	(7682)	Sufficiency Rating 84.17 SD			
6		Curb Cond	(7672)	9		Pier Prot	(7683)	High Risk			

Inspections Performed:

Freq	Hrs	Date	Rep Type
24	2.0	6/25/2019	Routine
24	8.0	5/25/2019	Fract Crit
			UW
			Special
			Interim
			UWI
			Damage
			FRM Safety
			SEC Safety
			Condition
			Short Span
			In Depth
			Geometric

BMS Elements

Element	Element Description	Total	Units	State 1	State 2	State 3	State 4
28	Concrete Deck w/Coated Bars	6420	SF	6420	0	0	0
29	Steel Deck - Concrete Filled Grid	3740	SF	3740	0	0	0
85	Concrete Deck Soffit	6420	SF	6420	0	0	0
113	Steel Stringer	880	LF	880	0	0	0
126	Steel Thru Truss	220	LF	60	0	130	30
133	Truss Gusset Plates	44	EA	28	0	10	6
152	Steel Floor Beam	216	LF	216	0	0	0
207	Concrete Pile/Column w/Steel Jacket	32	EA	32	0	0	0
212	Concrete Submerged Pier Wall	42	LF	42	0	0	0
215	Concrete Abutment	80	LF	80	0	0	0
221	Concrete Foundation	8	EA	8	0	0	0
284	Timber Sidewalk & Supports	880	SF	880	0	0	0
311	Moveable Bearing (roller, sliding, etc)	18	EA	18	0	0	0
316	Isolation Bearing	4	EA	4	0	0	0

Status: Lock | Printed On: 6/4/2020 | Agency: SNOQUALMIE

CD Guid: dbeab63e-3460-49c1-8eaf-1b5fce76cdb4 | Release Date: | Program Mgr: Roman G. Peralta

Br. No. 1726A | SID 08435700 | Br. Name MEADOWBROOK BR

Carrying MEADOWBROOK WAY SE | Route On 67430 | Mile Post 1.28

Intersecting SNOQUALMIE RIVER | Route Under | Mile Post

BMS Elements (Continued)

Element	Element Description	Total	Units	State 1	State 2	State 3	State 4
321	Concrete Roadway Approach Slab	1900	SF	1900	0	0	0
330	Metal Bridge Railing	900	LF	900	0	0	0
340	Metal Pedestrian Railing	404	LF	404	0	0	0
361	Scour	2	EA	2	0	0	0
404	Compression Seal / Concrete Header	80	LF	80	0	0	0
705	Bridge Luminaire Pole and Base	2	EA	2	0	0	0
802	Thin Polymer Overlay	10160	SF	10160	0	0	0
903	Inorganic Zinc/Urethane Paint System	20000	SF	18000	0	1000	500

Notes

0 ORIENTATION
Beginning of Bridge - South Abutment = P1. Snoqualmie River flows east to west.
Truss is Span 4 on P4 and P5. North abutment is P10

1 FRACTURE CRITICAL NOTE:
SEE FC SUMMARY SHEET FOR THE DETAILED FRACTURE CRITICAL CONDITION, NOTES 128 STEEL THROUGH TRUSS AND 133 GUSSET PLATES CONTAIN GENERAL REMARKS.

3 GENERAL NOTE:
Single lane bridge, with traffic signal traffic control.
UBIT
A UB-60 is required to inspect under the truss and is able to go through the center X bracing.
Deploy from west side of truss, sidewalk on east side interferes with UBIT deployment.

2005 Rehab included:
New concrete approaches, ground stone column densification, installation of isolation bearings, truss repair, lead paint removal and painting with moisture cure paint, exhodermic deck with light weight concrete, sidewalk replacement with Trex hard deck planks, and installation of 4 post tensioning rods in each pier under the truss (1 3/4" dia, 42' deep)

11 LOAD RATING:
Controlling Point: L5-U6 east truss (Bracing).

28 CONCRETE DECK WITH COATED BARS
Approach spans only.
Longitudinal cracks with some areas of pattern cracks, aggregate voids scattered throughout wheel lines. Very light tining.
Stop bars at traffic lights are worn away

29 STEEL DECK CONCRETE FILLED METAL GRID
In truss span only.
SURFACE: Sporadic aggregate voids in wheel lines.
SOFFIT: Steel bottom; No defects noted.

35 CONCRETE DECK SOFFIT
Approach spans only
Spans 2,6,7,8,9 have multiple full length longitudinal hairline leaching cracks with stalactites.

113 STEEL STRINGER
Four lines of steel stringers in span 4
No defects noted.

Status: Lock | Printed On: 8/4/2020 | Agency: SNOQUALMIE

CD Guid: dbeab63a-3480-49c1-8aaf-1b6fce76edb4 | Release Date: | Program Mgr: Roman G. Peralta

Br. No. 1726A **SID** 08435700 **Br. Name** MEADOWBROOK BR

Carrying MEADOWBROOK WAY SE **Route On** 87430 **Mile Post** 1.28

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Notes (Continued)

126	STEEL THROUGH TRUSS (Span 4) L0 - L11 and U1 - U10 SEE FC SUMMARY SHEET FOR DETAILED GUSSET PLATE CONDITIONS. THE FOLLOWING ARE GENERAL REMARKS Bottom Chord: The lower chord between L4 and L7 are comprised of four angles that form an I-beam oriented on its weak axis. Holes have been drilled in angles to allow water to drain but they have become clogged with dirt and debris. Outside chords have spaces between the angles for drainage, with spacer plates connecting them at regular intervals. Many bottom chord rivet heads have section loss. Heavy pack rust is forming between the angles at drain holes locations and connections. The pack rust is more prevalent on the outside face of the east truss. Heavy section loss on the corners and underside of the back to back angles with L6-L7 exhibiting the worst loss. Mild to moderate pitting was noted throughout the bottom chord. The middle of the underside of the splice plates at gusset plate locations typically exhibit moderate section loss. The east bottom chord exhibits impact deformations in several areas. Upper Chord: A manlift is required to inspect the upper chord. A manlift was not used during the 2019 inspection. Moss growth at N portal @ W U9-U10, U10,U11 Verticals and Diagonals: Many of the diagonal members are buckled. See FC summary. Struts and Sway Bracing: Many of the upper middle transverse bracing sag. Diagonal cross bracing: South end cross bracing are very tight while the north end bracing are loose and can be shaken.
133	GUSSET PLATES: SEE FC SUMMARY SHEET FOR DETAILED GUSSET PLATE CONDITIONS. THE FOLLOWING ARE GENERAL REMARKS. Lower chord gusset plates L3-L8 typically exhibit minor to moderate (1/16"-1/8") painted over pitting on the exterior faces and minor to severe (1/8" - holed through) pitting on the inside facing faces above the clip angles. The most severe condition exists at L3 on the west truss: 100% section loss 9" long 1/2" high in the west face of the interior gusset plate between the vertical clip angles and the lower chord angles.
152	STEEL FLOOR BEAM Twelve 16' long floor beams numbered FB0-FB11. Floor beams have abandoned welds from previous stringer connections. FB3 rust forming on low flange.
207	CONCRETE COLUMN WITH STEEL JACKET No defects noted
212	CONCRETE SUBMERGED PIER WALL ON TIMBER PILES Piers 4 and 5. Both piers - moderate abrasion below high water mark, leaching at horizontal construction joints, moss and algae growth on pedestals. P4 - wall is outside of waterline at time of inspection. Footing is not exposed. P5 - south face in channel at time of inspection. Footing is exposed full length, relic piles visible around footing in channel.
215	CONCRETE ABUTMENT Embankment under Pier 1 is sloughing under cap at east end. Void is 3" vertical 25" horizontal.
221	CONCRETE PILE CAP P3 cap: leaching hairline crack on bottom face of cap, near centerline.

Status: Lock | Printed On: 6/4/2020 | Agency: SNOQUALMIE

CD Guid: dbeab63e-3480-49c1-8eef-1b8fce76edb4 | Release Date: | Program Mgr: Romen G. Peralta

Br. No. 1726A **SID** 08435700 **Br. Name** MEADOWBROOK BR

Carrying MEADOWBROOK WAY SE **Route On** 87430 **Mile Post** 1.28

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Notes (Continued)

284	TIMBER SIDEWALK AND SUPPORTS TREX sidewalk on three lines of timber stringers. Outside timber stringer is weather checked.
311	ELASTOMERIC BEARINGS Transition bearings - no defects noted
316	ISOLATION BEARINGS Truss bearings on piers P4, P5 4A - 1/8" deep pitting on inside face of bearing assembly 4B - 1/8" deep pitting on the west face of the interior clip angles. 5A - Pack rust between the interior gusset plate and the bearing clip angle. 5B - Pack rust present inside the bearing assembly and bearing clip angle.
321	CONCRETE APPROACH SLAB Longitudinal hairline cracks in approach slabs.
330	METAL BRIDGE RAILING Scrapes at several locations both rails.
340	METAL PEDESTRIAN RAIL Metal chain link fencing and support rails are sagging between posts at several locations.
361	SCOUR - FIELD Pier 4 and 5 are at edge of channel. Footings are founded on timber piles. River banks are well vegetated, channel is well defined silty banks, scattered riprap with some woody debris. Water velocity is typically slow to moderate, channel bottom is relatively flat. P5 - east end top of footing exposed. Relic piles around footing some downstream protrude above water surface downstream approx 30'. Soundings taken upstream side from sidewalk top of rail. Distance from top of rail to deck is 4.5 feet. Measurements taken at each panel point starting at south Pier 4.

Year	PP0	PP1- E/W	PP2	PP3	PP4	PP5	PP6	PP7	PP8	PP9	PP10 E/W	PP11
2019	28.2	36.2	47.8	48.0	47.8	48.2	48.2	45.5	44.0	43.8	41.3	29.6
2016	31.0'	37.5	48.2	48.4	48.4	47.2	47.0	46.5	45.2	45.5	42.1	38.0

404	COMPRESSION SEALS North roadway/approach slab and approach slab/deck seal has settled 1/2" from top of header. All approach seals are full of sandy debris.
705	TRAFFIC SIGNAL POLE AND BASE One traffic control light per approach. No defects noted.
902	DECK OVERLAY Epoxy overlay added to north approach deck in August 2009. Overlay is wearing in wheel lines.
903	PAINT Peeling paint common on rivet heads. Light rust staining bottom side of upper sway braces at connections. Active pack rust between gusset plates and upper chord flange. Encapsulation was not achieved in lower chord - active pack rust between angles. U3E - U2E Peeling and blistered paint bottom side of top flange near U3E. Many areas on the inside faces of the gusset plates below the bottom chord have active rusting due to paint failure.
1661	ALIGNMENT Sharp horizontal curve at north end.

Status: Lock | Printed On: 6/4/2020 | Agency: SNOQUALMIE

CD Guid: dbeab82a-3480-48c1-8eaf-1b6fae76adb4 | Release Date: | Program Mgr: Roman G. Peralta

Br. No. 1726A **SID** 08435700 **Br. Name** MEADOWBROOK BR

Carrying MEADOWBROOK WAY SE **Route On** 87430 **Mile Post** 1.28

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Notes (Continued)

1671	SUPERSTRUCTURE Heavy section loss on the inside faces of lower chord gusset plates above clip angles. One fracture critical gusset plate is rusted through. See notes in element 133.
1680	SCOUR - FIELD Footings are founded on timber piles. Footings are stable.
1687	TERMINALS Terminal reflectors peeling away.
2668	REVISE LOAD RATING New load rating needed based on updated lower chord and gusset plate conditions.
7672	CURBS Severe delaminations of three patched areas in west curb at bridge light locations (3W, 6W, 8W).

Repairs

Repair No	Pr	R	Repair Descriptions	Noted	Maint	Verified
10001	M	S	MONITOR pack rust build up between lower chord angles, gusset plates, and floor beam seats.	6/27/2011		
10010	2	S	RAIL Repaint section of rail that has scraping with exposed steel to prevent corrosion.	8/3/2009		
10011	1	S	LOW CHORD MAINTENANCE seal sides of built-up members of the upstream lower cord to prevent further rusting, replace rusted rivets, and clean out drain holes on the low chords.	8/3/2009		
10012	2	S	STEEL TRUSS Pressure wash bridge to preserve the paint.	6/25/2019		
10013	2	S	STRIPING Restripe stop bars at traffic signal on both approaches	6/25/2019		
10014	2	S	CURBS Repair failed grout around electrical boxes, west curb.	6/25/2019		

Inspections Performed and Resources Required

Report Type	Date	Freq	Hrs	Insp	Certifie	Coinsp	Note
Routine	6/25/2019	24	2.0	BJM	G1714	BLR	
Fracture Critical	6/25/2019	24	0.0	BJM	G1714	BLR	
Equipment	6/25/2019	24	6.0	BJM	G1714	BLR	Schedule full bridge closure for duration of UBIT inspection.

Resources	Hours	Min	Pref	Max	Freq Date	Need Date	Override	Notes
UBIT	6.00	ANY	60	ANY				SDOT US 60
Scheduling Restrictions								Schedule inspection during summer months when school is out of session
Informational		5/15/2020			MAG	G1103		Update routine frequency from 12 to 24 months

Sticky Notes

Creator	Created	Table Reference	Notes
King County/Gemosundi	5/15/2020	Report Types	conduct in-depth inspection of gusset plates at W-L3 and E-L3 check for cracking or tearing in pitted areas near connections

BRIDGE INSPECTION REPORT

Status: Released | Printed On: 11/8/2018 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a93-be53-d9497c6e2676 | CD Date: 9/26/2018 | Program Mgr: Harvey L. Coffman

Br. No. 202/60 **SID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On 00202** **Mile Post 26.00**

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Inspector's Signature WDS Cert # G0910 Cert Exp Date 1/12/2022 Co-Inspector's Signature AAS

5		Structural Eval	(1657)	44		Operating Tons	(1552)	6		No Utilities	(2675)
2		Deck Geometry	(1658)			Op RF	(1553)	1		Bridge Rails	(1064)
9		Underclearance	(1659)	26		Inventory Tons	(1555)	0		Transition	(1065)
8		Alignment	(1661)			Inv RF	(1556)	0		Guardrails	(1066)
5		Deck Overall	(1663)	5		Operating Level	(1650)	0		Terminals	(1067)
6		Superstructure	(1671)	A		Open/Closed	(1293)	3.00		Asphalt Depth	(2610)
6		Substructure	(1675)	6		Waterway	(1662)	10.0		Design Curb Ht	(2611)
9		Culvert	(1676)	3		Scour	(1660)	31.6		Bridge Rail Ht	(2612)
8		Chan/Protection	(1677)					1931		Year Built	(1332)
N		Pier/Abut/Prot	(1679)					0		Year Rebuilt	(1336)

Y	*	Soundings Flag	(2593)
		Measure Date	(2594)

	Revise Rating	(2588)
	Photos Flag	(2691)
	OA Flag	(2695)

Sufficiency Rating 45.08 FO

High Risk

Inspections Performed:

Freq	Hrs	Date	Rep Type
24	1.0	9/18/2018	Routine
24	8.0	9/18/2018	Fract Crit
			UW
			Special
			Interim
			UWI
			Damage
			PRM Safety
			SEC Safety
			Condition
			Short Span
			In Depth
72	1.0	1/4/2014	Geometric

BMS Elements

Element	Element Description	Total	Units	CS 1	CS 2	CS 3	CS 4
12	Concrete Deck	10,656	SF	10,445	211	0	0
38	Concrete Deck Soffit	10,656	SF	10,650	0	6	0
110	Concrete Girder	696	LF	694	0	2	0
113	Steel Stringer	2,420	LF	2,378	2	40	0
126	Steel Thru Truss	440	LF	280	100	60	0
133	Truss Gusset Plates	44	EA	44	0	0	0
162	Steel Floor Beam	300	LF	270	0	30	0
200	Abutment Fill	2	EA	2	0	0	0
205	Concrete Pile/Column	20	EA	16	0	4	0
214	Concrete Web Wall between Columns	36	LF	35	0	1	0
215	Concrete Abutment	74	LF	74	0	0	0
227	Concrete Submerged Pile/Column	4	EA	0	0	4	0
284	Timber Sidewalk & Supports	2,200	SF	2,200	0	0	0
286	Concrete Sidewalk & Supports	2,240	SF	2,207	0	33	0
311	Moveable Bearing (roller, sliding, etc)	2	EA	0	0	2	0
313	Fixed Bearing	12	EA	12	0	0	0
322	Bridge Impact	2	EA	0	0	2	0

Status: Released | Printed On: 11/8/2018 | Agency: Washington State

CD Guid: e0f83d4a-b7dd-4a91-ba53-d9497c5a2676 | CD Date: 9/26/2018 | Program Mgr: Harvey L. Coffman

Br. No. 202/60 **BID 0001460A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

BMS Elements (Continued)

Element	Element Description	Total	Units	CS 1	CS 2	CS 3	CS 4
330	Metal Bridge Railing	888	LF	768	0	120	0
340	Metal Pedestrian Railing	440	LF	440	0	0	0
341	Concrete Pedestrian Railing	448	LF	436	0	12	0
358	Steel Cracking	2	EA	0	2	0	0
357	Pack Rust	1	EA	1	0	0	0
361	Scour	5	EA	4	1	0	0
378	Concrete Deck Delamination Testing	10,656	SF	10,445	211	0	0
402	Open Concrete Joint	360	LF	360	0	0	0
406	Steel Sliding Plate w/Raised Bars	48	LF	0	48	0	0
801	AC Overlay with Waterproofing Membrane	10,656	SF	10,644	10	2	0
901	Red Lead Alkyd Paint System	31,950	SF	0	0	21,950	10,000

Notes

0 Bridge is oriented from west to east, with the east end closest to the City of Snoqualmie.

The sign on the north rail rattles with traffic and has bolts that are loose and/or not engaged. See Photo #95 REPAIR #12527

1 Span 3 is a fracture critical steel thru truss, see the "Fracture Critical Drawings" and "Fracture Critical Report" files.

8 WSDOT BPO Dive Team inspected the bridge on September 3, 2008.
The 2008 and 2003 underwater inspection found the piers to be in only 6' of water. The underwater inspection requirement will no longer be necessary so long as the riprap pier protection is monitored regularly during routine inspections.

12 Deck is covered with an ACP overlay, see the element 378 and 801 notes.

35 Soffit has longitudinal and transverse hairline cracks, some are leaching and rusty.
Soffit has scattered spalling along the exterior floorbeams with some exposed rebar

110 Concrete girders have hairline vertical cracks at midspan.
Pier 1 diaphragm between Girders 1B and 1C has a 24" rust stained crack.
Pier 1 diaphragm between Girders 1C and 1D has a 24" x 6" x 1" deep spall with 18" of exposed rebar
Pier 3 east top edge of diaphragm has three spalls, up to 12" x 60".
Girder 4A at Pier 5 is cracked and spalled on the north bottom corner, see photo #16
Pier 6 diaphragm between Girders 4C and 4D is spalled exposing five vertical rebar.
Girder 6C at Pier 7 has two exposed rebar in the haunch, up to 6" long.

113 Stringers have surface and laminar rust up to 1/8" thick in the edges of the top and bottom flanges, see photo #36.
Copes have some rust pitting/scalloping with up to 5% section loss in scattered locations.
Stringer 3F at Floorbeam 2 has a new web section welded in to repair a cope crack
Stringer 9D at Floorbeam 8 has a cope crack arrested with a bolt.

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CD Guid: e0f6364a-b7dd-4a93-ba53-d9497c8a2676 | CD Date: 9/28/2018 | Program Mgr Harvey L. Coffman

Br. No. 202/80 SID 0001480A Br. Name SNOQUALMIE RIVER

Carrying SR 202 Route On 00202 Mile Post 26.00

Intersecting SNOQUALMIE RIVER Route Under Mile Post

Notes (Continued)

126 Sways have been raised leaving unfilled bolt holes in the vertical members.
A few of the lower sway struts are buckled and bent out of plane.
Sway gussets for L6S to L9N at L9N and L6S to L7N at L7N have laminar rust with only a knife edge remaining around the free edges.
West portal frame over the westbound lane has been damaged by a high load impact. The bottom angle assembly (two 2-1/2" x 3" angles) of the bottom strut has been torn and is 12" out of plane measured between the closest gusset plates in the sway frames. The top angle assembly of the bottom strut is bent 1-1/2" out of plane measured between the closest gusset plates, see photos #87 and #88. REPAIR #12528.
West portal frame over the eastbound lane is bent out of plane 2-1/2" measured between the closest gusset plates, see photo #77. REPAIR #12528.
North Truss, end post L0-U1 bottom flange just above the guardrail has a small tear (1" over 3").
South Truss, end post L11-U10 has the channel bottom flange bent back against the web, 22" long, and has a torn flange 11" long, see photo #13.
East portal frame over the eastbound lane has a bend of 3/4" over 24", see photo #80. REPAIR #12528.
East portal frame over the westbound lane is bent out of plane 7-1/2" and is torn near the centerline, see photos #81 and #85. REPAIR #12528.

For details on the fracture critical members, see the "Fracture Critical Drawings" and "Fracture Critical Report" files

133 Gusset plate thicknesses were verified in 2010.

152 Floorbeams have heavy mud and rust staining on the top and bottom flanges with laminar rust, rust scalloping, and up to 1/4" of flange edge thickness loss (from 7/8" original to 5/8" existing), see photo #14

200 There is minor sloughing below the abutment diaphragms.

205 Columns near the girder seats have vertical and diagonal cracks up to 1/4" wide, some of which are rust stained.
Column 2A southwest edge has a small shallow spall.
Column 2D east face has 10" of exposed rebar due to lack of cover
Column 5A at the girder haunch has a 3" x 6" x 2" deep spall and several cracks
Column 5B has a delamination and spall with 12" of exposed rebar.
Column 5C south face above the web wall has 6" of rebar exposed due to lack of cover
Column 5D at the southeast corner has a 24" delamination.
Column 6B east face has 12" of exposed rebar due to lack of cover.
Column 6C southeast edge has 3 ft. of delamination and several rebar exposed due to lack of cover
Column 6D east face has 3" of exposed rebar due to lack of cover.

214 Pier 3 webwall is abraded below waterline.
Pier 4 webwall west face near Column 4B has a 7" x 1-1/2" x 1/2" deep spall with 6" of exposed rebar.

227 Concrete submerged columns are located at Piers 3 and 4.
Columns have vertical hairline cracks 24" long.
Column 3A east face near the base has a 24" x 6" x 2" deep spall.
Column 3A east face near the top has a 38" x 12" x 3" deep spall with 30" of exposed rebar.
Column 3B west face near the top has a 20" x 18" x 1" deep spall with exposed vertical and hoop bar
Column 3B east face near midheight has a 18" x 6" x 1-1/2" deep spall.
Column 4A east face has 6" of hoop bar exposed due to lack of cover.

294 Timber sidewalk along both sides of Span 3.
There is a gap at the northwest corner has been covered with a steel plate. See photos #96 and #104. REPAIR #12530 verified 9/19/2018.

258 Concrete sidewalks located in the approach spans.
Sidewalks have vertical and diagonal hairline leaching cracks in the support brackets.
Sidewalk soffit has transverse leaching hairline cracks and spalls up to 12" x 12" x 3" deep, some of which have exposed rebar
Span 6 north soffit has two 18" long exposed rebars due to lack of cover and several delaminations.

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Br. No. 202/60 | SID 0001480A | Br. Name SNOQUALMIE RIVER

Carrying SR 202 | Route On 00202 | Mile Post 26.00

Intersecting SNOQUALMIE RIVER | Route Under | Mile Post

Notes (Continued)

311 Rockers and bearing plates at Pier 3 have surface rust and there is dirt and debris around the bearings
South rocker bearing at Pier 3 is tilted 15 degrees in expansion in 2016 (18 degrees in 2012 and 2014).
The north rocker bearing at Pier 3 is tilted 15 degrees in expansion in 2016 (no change from 2012 and 2014).
See photo #91 for placement of tilt meter. REPAIR #12511.

313 Fixed bearings at Pier 4 have peeling paint and rusty plates

322 Approaches have up to 1/2" settlement

330 Metal bridge rail has minor traffic scrapes throughout
North rail:
Between Panel Points L7-L8. Post anchorage is missing a bolt in the soffit connection, see photo #21. REPAIR 12506
Between Panels L6-L7, L8-L9, and L10-L11. Post anchorages have loose bolts in the soffit connections. REPAIR 12508
South rail:
Between Panels L2-L3. Post anchorages have loose and missing bolts in the soffit connections. REPAIR 12508
Between Panels L8-L9. Post anchorages have loose bolts in the soffit connections. REPAIR 12508.

340 Metal pedestrian railing is located along the truss span
Several lattice bars are bent, and have chipped and peeling paint with rust streaks.

341 Concrete pedestrian railing is located along the approach spans.
West approach has exfoliation on the rails and posts in several locations. See photo #97.

356 Repaired cracks in the stringers, see the element 113 note.

357 Pack rust is present in the truss, see the element 126 note and Fracture Critical Report.

361 Snoqualmie River flows from north to south under Span 3
Riprap is in place around Pier 3, see photo #58.

376 In September of 1976, 211 sq. ft. of deck was repaired before the ACP was placed.

402 Pier 2 header has minor 'D' spalls
Pier 5 is missing 6 ft. of seal.
Pier 6 is missing 6 ft. of seal.
Pier 7 is missing 12 ft. of seal.
East abutment has cracked header.

409 Steel sliding plate with raised bars is located at Piers 3 and 4.
East joint has been recently re-sealed.
West joint is torn and full of dirt and debris, and the bottom plate has heavy surface rust.
Below the joints there are delaminations and spalls up to 60" x 12", see photo #61.
Joint measurements at the centerline:

Year	Pier 3	Pier 4	Temperature	Time
2016	1-7/8"	1-3/8"	60°F	10:00 am
2016	1-5/8"	1-1/2"	70°F	1:00 pm
2014	1-1/2"	1-3/4"	60°F	10:00 am

601 Overlay has minor rutting in the wheel lines.
Span 1 has two 1 sq. ft. gouges in the EB lane, 1" deep.
Span 3, Panel 4 has a 10 sq. ft. patch in the westbound lane.

901 Steel truss has peeling and cracking paint throughout, see photo #24
Truss top chords are bare steel along top and inside faces, see photo #94.
Truss bottom chords have numerous spots of rusty steel where paint has peeled away. Rust in the top and bottom flanges of stringers and floorbeams.
Floorbeam and stringer flanges have areas of laminar rust.

1662 Slight chance of overtopping deck and approaches.

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Br. No. 202/80 **BID 0001480A** **Br. Name SNOQUALMIE RIVER**

Carrying SR 202 **Route On** 00202 **Mile Post** 26.00

Intersecting SNOQUALMIE RIVER **Route Under** **Mile Post**

Notes (Continued)

1663	Deck is coded a '6' due to 2% patches in deck, see the element 376 note.
1671	Superstructure is coded a '6' due to the deterioration of the stringers and floorbeams and impact damage to both portals. See the element 113 and 182 notes.
1677	Medium to large riprap placed on the west side of the river bank. Channel has minor sloughing in the east embankment, downstream of the bridge. See photos #101 and #102
1680	Piers 3 and 4 are pile supported. Calculated scour falls to within 10 ft. of the pile tips. Pier 3 has a riprap repair placed in 2001.
1685	Transitions are not reeled and do not meet current standards. NE corner of bridge transition has minor impact damage, see photo #99. REPAIR #12528
1686	Guardrail height does not meet current standards. NE guardrail has two damaged spacers, see photo #99. REPAIR #12528
1687	Terminals are not slotted.
2675	Utilities under the south sidewalk: Plastic (natural gas) pipe 7" diameter, steel pipe 4½" diameter, and a corrugated metal pipe 18" diameter. Hanger stud for the 7" diameter pipe is missing a bolt at L4 south, see photo #51. REPAIR #12510. Utilities under the north sidewalk: Iron pipe 10" diameter, iron sewer pipe 6" diameter, and a steel pipe 2" diameter. The 10" pipe hanger at Pier 2 is missing a bolt. The 10" pipe hanger at L3 north is missing a bolt. The 10" pipe hanger between L4 and L5 has a broken rod, see photo #93. REPAIR #12510. The 10" pipe has an air-vacuum valve no longer is leaking sewage, see photos #100 and #103. REPAIR #12529 verified 9/18/2018. The 6" pipe hanger is broken near the east abutment, see photo #92. REPAIR #12510. The 2" diameter pipe is disconnected at the east end, with a severed cable exposed
2694	Vertical clearance checked on 8/16/2018. Minimum clearance measured to be 15' 10" below the west portal to the center line stripe.

Repairs

Repair No	Pr	R	Repair Descriptions	BMS	Noted	Maint	Verified
12508	2	B	Replace missing bolts and tighten loose bolts for bridge railing post anchorages at soffit connections underneath bottom of deck (north rail between panels L6-L7, L7-L8, L8-L9, L10 L11, south rail between panels L2-L3 and L8-L9).	330	9/4/2008		
12510	C	U	7" diameter utility on the south side: Replace the missing bracket bolt at L4. 10" diameter utility on the north side: Replace the missing bracket bolts at Pier 2 and at L3 and the broken utility hanger rod between L4 and L5. 6" diameter utility on the north side: Replace the broken utility hanger at the east abutment.	2675	9/4/2008		
12511	M	B	Monitor north and south bearings at Pier 3. For consistent tilt measurements, measure off of a straight edge extended between end points on the rocker arms, see photo #91. YEAR Bearing 3A Bearing 3B 2008 15 16 JED/TKK 2010 15 16 WDS/MLB 2012 15 16 DAG/WAW 2014 15 16 CRT/BTP 2016 15 16 JPP/MAW 2018 15 16 WDS/AAS	311	9/4/2008		
12528	1	B	Repair or replace damaged portions of both the east and west portals. Heat straightening or cut/replace methods may both be considered. Torn members shall be replaced. Check status at each inspection and monitor for urgent repair needs. Contact Josh Martin (360-570-2560) to schedule development of repair plans.	126	9/15/2014		

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Br. No. 202/60 BID 0001480A Br. Name SNOQUALMIE RIVER

Carrying SR 202 Route On 00202 Mile Post 26.00

Intersecting SNOQUALMIE RIVER Route Under Mile Post

Repairs (Continued)

Repair No	Pr	R	Repair Descriptions	BMS	Noted	Maint	Verified
12627	2	B	Repair or replace the loose sign mounting hardware for the sign on the north rail.	0	9/14/2016		
12628	0	J	Replace NE transition, guardrail, and two damaged spacers	1685, 1686	9/14/2016		
12629	0	U	Repair or replace leaking air-vacuum sewage valve on north side of bridge near Pier 3.	2675	9/14/2016		9/16/2016
12630	2	B	Replace the metal plate at the NW corner of the timber sidewalk.	384	9/14/2016		9/16/2016

Inspections Performed and Resources Required

Report Type	Date	Freq	Hrs	Insp	Certifie	Coinsp	Note
Routine	9/16/2016	24	1.0	WDS	G0910	AAS	

Resources	Hours	Min	Pref	Max	Freq	Date	Need Date	Override	Notes
SNDG					24	9/16/2016	9/16/2020		

Fracture Critical		9/16/2016	24	8.0	WDS	G0910	AAS		
Resources	Hours	Min	Pref	Max	Freq	Date	Need Date	Override	Notes
UBIT	3.00	02	02	02	24	9/16/2016	9/16/2020		The UBI is used to inspect the bottom chords and floorbeam/stringer system. The A30 will not work due to the sidewalk width and the diagonal configuration in Panels 4, 5 and 6.
Bucket	3.00		BK	BK	24	9/16/2016	9/16/2020		Used a bucket truck to inspect the upper portion of the trusses
Flagging	8.00	ST	ST	ST					Flagging required for use of UBIT and bucket truck. Contact James Christo at 425-213-2352.
Scheduling Restrictions									Inspection Work Window: Weekdays 8am-2pm

Geometric	1/4/2014	72	1.0	QGI	GEOM	DJM	Added Geometric Report

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Connections	6	6/25/2019

Bridge Number	Inspector	Title	Identification Number
1725A	Bob Miell	Lead Inspector	G1714
Bridge Name	**Co-Inspector**	**Title**	**Identification Number**
Meadowbrook	Ben Rosik	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Lower Gusset Plates (Upstream)

Span	Location	Detail Description	Remarks
4	L0	Lower Gusset Plate (East)	1/8" deep pitting on the west face of the interior clip angles.
4	L1	Lower Gusset Plate (East)	No defects found.
4	L2	Lower Gusset Plate (East)	6" long by 1/8" deep pitting on the inside of both gusset plates above the vertical clip angles.
4	L3	Lower Gusset Plate (East)	1/4" long by 1/4" deep pitting on the inside of both gusset plates above the vertical clip angles, the exterior gusset late active pitting. 1/8" deep pitting on the east face of the interior gusset plate above the lower chord and north of the vertical.
4	L4	Lower Gusset Plate (East)	Up to 3/16" deep pitting in the east face of the interior gusset plate and up to 1/8" deep pitting in the west face of the exterior gusset plate above the clip angles
4	L5	Lower Gusset Plate (East)	12" long and up to 1/4" deep pitting in the west face of the exterior plate above and along the clip angles and 1/8" deep pitting in the east face of the interior plate above and along the clip angles. Up to 3/16" deep pitting throughout the bottom half and above the clip angles on the west face of the interior gusset plate. Up to 1/8" deep pitting on the east face of the interior gusset plate above the lower chord south of the vertical. 6" diameter up to 1/8" deep pitting on the east face of the exterior gusset plate.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspected	Hours	Date
King County	Truss Connections	6	6/25/2019

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Miletl	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Lower Gusset Plates (Upstream)

Span	Location	Detail Description	Remarks
4	L6	Lower Gusset Plate (East)	Up to 1/4" deep pitting over 1'-6" long in the west face of the exterior gusset plate and on the east face of the interior gusset plate at the top of the clip angles. Scattered pitting up to 3/8" deep in the east face of the exterior gusset plate and along the edge of the gusset at the L7-L6 interface.
4	L7	Lower Gusset Plate (East)	The exterior face of exterior gusset plate has 2 areas of 6" diameter 1/8" deep pitting. The east face of the interior gusset plate has 1/8" deep pitting north of the vertical above the lower chord. Up to 3/16" deep pitting 6" long over the clip angles on the interiors of both gusset plates.
4	L8	Lower Gusset Plate (East)	1/4" deep x 7" long pitting on the interiors of both gusset plates above the clip angles. Inside north angle best from pack rust. 3" diameter 1/16" deep pitting on the west face of the exterior gusset plate above the lower chord at the south end.
4	L9	Lower Gusset Plate (East)	Pack rust in edges. 1/8" deep x 4" long pitting on the interior gusset plate above the clip angles.
4	L10	Lower Gusset Plate (East)	No defects found.
4	L11	Lower Gusset Plate (East)	Pack rust between the interior gusset plate and the bearing assembly.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Connections	6	6/29/2017

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mitell	Lead Inspector	G1714
Bridge Name	**Co-Inspector**	**Title**	**Identification Number**
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Upper Gusset Plates (Downstream)

Span	Location	Detail Description	Remarks
4	U1	Upper Gusset Plate (East)	No defects found.
4	U2	Upper Gusset Plate (East)	Pack rust between plate and top flange upper chord
4	U3	Upper Gusset Plate (East)	Pack rust scalloped edge top flange upper chord
4	U4	Upper Gusset Plate (East)	Pack rust scalloped edge top flange upper chord
4	U5	Upper Gusset Plate (East)	Pack rust scalloped edge top flange upper chord
4	U6	Upper Gusset Plate (East)	No defects found.
4	U7	Upper Gusset Plate (East)	No defects found.
4	U8	Upper Gusset Plate (East)	Connection angle plate is rusting.
4	U9	Upper Gusset Plate (East)	No defects found.
4	U10	Upper Gusset Plate (East)	No defects found.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Connections	6	6/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlot	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Lower Gusset Plate (Downstream)

Span	Location	Detail Description	Remarks
4	L0	Lower Gusset Plate (West)	Typical pack rust between the interior gusset plate and the bearing assembly.
4	L1	Lower Gusset Plate (West)	1/4" bond to the east over 6" along the south edge of the exterior gusset plate near the bottom flange of L0-L1.
4	L2	Lower Gusset Plate (West)	No defects found.
4	L3	Lower Gusset Plate (West)	100% section loss 9" long 1/2" high in the west face of the interior gusset plate between the vertical clip angles and the lower chord angles. 50% of the section remaining in the east face of the exterior gusset plate above the clip angle. Patches of 10" diameter 1/8" deep pitting on the east face of the interior gusset. Another 3/16" deep pitting on the west face of the interior gusset plate above the lower chord south of the vertical. 1/4" deep pitting above the floorbeam clip angle on the east face of the interior gusset. Activm corrosion.
4	L4	Lower Gusset Plate (West)	Up to 3/16" deep 9" long pitting on the east face of the exterior gusset above the clip angles. Active corrosion. 1/8" deep pitting to the west face of the interior gusset plate over the lower chord between the vertical angles. Scattered 1/8" deep pitting on the east face of the interior gusset.
4	L5	Lower Gusset Plate (West)	Up to 3/16" deep pitting to the west face of the interior gusset plate above the clip angle Up to 1/8" deep pitting to the east face of the exterior gusset plate above the clip angle. 1/8" deep pitting throughout the east face of the interior gusset plate. 1/8" deep pitting on the west face of the interior gusset plate south of the vertical above the lower chord. Up to 3/16" deep pitting on the interior gusset plate between the vertical member above the lower chord. 1/4" deep pitting above the floorbeam clip angle and scattered 1/8" deep pitting on the east face of the interior gusset.

General Remarks

Agency	Feature Inspection	Hours	Date
King County	Truss Connections	6	8/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Miller	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Rosek	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Lower Gusset Plate (Downstream)

Span	Location	Detail Description	Remarks
4	L6	Lower Gusset Plate (West)	Scattered areas of 1/16" deep pitting along edges and the west face of the exterior plate and on the west face of the interior gusset plate at the south end over the lower chord. Patches of up to 3/16" deep pitting on the east face of the interior gusset plate. Pack rust is causing the corners of the clip angles to bend.
4	L7	Lower Gusset Plate (West)	Up to 3/16" deep x 6" long pitting on the west face of the interior gusset above and along the clip angles. Up to 1/8" deep pitting on the interior gusset plate below the lower chord at the north end. 1/8" pack rust at the south connection at the bottom chord, gusset plate is bulging out and slightly out of plane between the bottom chord the diagonal member U6-L7.
4	L8	Lower Gusset Plate (West)	3/16" deep x 7" long pitting above clip angles on both gusset plates. 1/16" deep x 5" diameter pitting on the interior gusset plate between the vertical and south diagonal.
4	L9	Lower Gusset Plate (West)	Up to 1/16" deep pitting over 6" on the interior of both gusset plates above the clip angles.
4	L10	Lower Gusset Plate (West)	Bolts on west face of connection plate rusting
4	L11	Lower Gusset Plate (West)	Pack rust between the interior gusset plate and the bearing clip angle.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Connections	6	6/29/17

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlefi	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Upper Gusset Plate (Upstream)

Span	Location	Detail Description	Remarks
4	U1	Upper Gusset Plate (West)	Light rust between upper flange and gusset plate
4	U2	Upper Gusset Plate (West)	Pack rust forming at upper flange and gusset plate
4	U3	Upper Gusset Plate (West)	Pack rust scalloped edge top flange upper chord
4	U4	Upper Gusset Plate (West)	Pack rust scalloped edge top flange upper chord
4	U5	Upper Gusset Plate (West)	Pack rust scalloped edge top flange upper chord
4	U6	Upper Gusset Plate (West)	
4	U7	Upper Gusset Plate (West)	
4	U8	Upper Gusset Plate (West)	Rust forming between plate and upper chord
4	U9	Upper Gusset Plate (West)	
4	U10	Upper Gusset Plate (West)	

General Remarks

Fracture Critical Inspection Report

Agency	Portion Inspected	Hours	Date
King County	Truss Members	6	8/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlekt	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roack	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Lower Chord (Upstream)

Span	Location	Detail Description	Remarks
4	L0-L1	Lower Chord (East)	Laminar Rust/Corrosion between back-to-back angles. Top flange cover plate rusted through above L0.
4	L1-L2	Lower Chord (East)	1" bend over 12" in the bottom east angle near L1. Laminar Rust/Corrosion between back-to-back angles and minor 2 diaps.
4	L2-L3	Lower Chord (East)	Up to 1/8" deep pitting on the underside of the L1-L2 and L2-L3 splice plate. Laminar Rust/Corrosion between back-to-back angles.
4	L3-L4	Lower Chord (East)	Up to 1/8" deep pitting to the underside of the angles at L3. Laminar Rust/Corrosion between back-to-back angles. 1/8" deep pitting throughout the batten plates.
4	L4-L5	Lower Chord (East)	Laminar Rust/Corrosion between back-to-back angles. Up to 1/8" deep pitting on the interior of the top angles over the full length of the member. 1/8" deep pitting along the length of the west face of the lower chord. 3/16" deep pitting between the corners of the exterior angles.
4	L5-L6	Lower Chord (East)	Up to 1/8" deep pitting to the both bottom exterior angles throughout the length of the member. Up to 3/16" deep SL to the edge of the touching bottom angles on the underside of the member. Laminar Rust/Corrosion between back-to-back angles. Up to 1/16" deep pitting on the interior of the top angles and rivet heads.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Members	6	8/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mike	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Lower Chord (Upstream)

Span	Location	Detail Description	Remarks
4	L6-L7	Lower Chord (East)	Up to 5/16" deep SL along the south half (5' long) of the member on the corners of the east angles. Minor section loss to the north half of the east angles and west angles. Several large areas of up to 3/16" deep pitting to the underside of the angles around drain locations. Laminar Rust/Corrosion between back-to-back angles. Rivet heads exhibit moderate scaling.
4	L7-L8	Lower Chord (East)	1/8" deep SL on both faces of the bottom east angle (1/4" reduction in section in some areas). Laminar Rust/Corrosion between back-to-back angles.
4	L8-L9	Lower Chord (East)	Up to 1/8" deep pitting on the underside of the lower angles at L8. Laminar Rust/Corrosion between back-to-back angles.
4	L9-L10	Lower Chord (East)	Top west flange is bent up 1/2" over 3" near midspan. Laminar Rust/Corrosion between back-to-back angles.
4	L10-L11	Lower Chord (East)	Laminar Rust/Corrosion between back-to-back angles. 1/8" deep pitting at the interior face at L11.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Members	6	8/22/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Miell	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Diagonal and Vertical Members

Span	Location	Detail Description	Remarks
4	U1-L2	Diagonal (East)	
4	U2-L3	Diagonal (East)	
4	U3-L4	Diagonal (East)	
4	L3-U4	Diagonal (East)	
4	U4-L5	Diagonal (East)	
4	L4-U5	Diagonal (East)	Buckling near the top chord.
4	U5-L6	Diagonal (East)	
4	L5-U6	Diagonal (East)	Buckling near rail with a slight twist. Bent out of plane to the east.
4	U6-L7	Diagonal (East)	
4	L6-U7	Diagonal (East)	Buckling near rail with a slight twist. Impact damage. Bent out of plane to the east.
4	U7-L8	Diagonal (East)	buckling near the rail.
4	L7-U8	Diagonal (East)	
4	L8-U9	Diagonal (East)	
4	L9-U10	Diagonal (East)	

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Members	6	6/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlot	Lead Inspector	01714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	0

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	East Truss Diagonal and Vertical Members

Span	Location	Detail Description	Remarks
4	L1-U1	Vertical (East)	
4	L2-U2	Vertical (East)	1.5 of 8 flanges rusted away near lower chord, section loss and hole (2"x0.5") in flange
4	L3-U3	Vertical (East)	
4	L4-U4	Vertical (East)	
4	L5-U5	Vertical (East)	
4	L6-U6	Vertical (East)	
4	L7-U7	Vertical (East)	
4	L8-U8	Vertical (East)	
4	L9-U9	Vertical (East)	
4	L10-U10	Vertical (East)	1/4" bend over 3" near the connection to the interior L10 gusset plate.

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspected	Hours	Date
King County	Truss Members	8	6/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mitoff	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Renk	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Lower Chord (Downstream)

Span	Location	Detail Description	Remarks
4	L0-L1	Lower Chord (West)	10 rivet laps showing rust
4	L1-L2	Lower Chord (West)	Rust/Corrosion between back-to-back angles
4	L2-L3	Lower Chord (West)	100% section loss with knife edging on the edges of the middle of the L1-L2 L2-L3 splice plate. Underside of the north 2" exhibits 1/4" deep SL. Rust/Corrosion between back-to-back angles
4	L3-L4	Lower Chord (West)	Rust/Corrosion between back-to-back angles
4	L4-L5	Lower Chord (West)	1/16" deep pitting throughout the inside faces of the vertical flange angles. Rust/Corrosion between back-to-back angles
4	L5-L6	Lower Chord (West)	Up to 1/8" deep pitting on the underside of the lower angles at L6. Rust/Corrosion between back-to-back angles. 1/8" deep pitting on the interior face - full length.
4	L6-L7	Lower Chord (West)	Up to 1/8" deep pitting to the west face of the west angles at the L6 interface. Up to 50% SL to many rivet heads. Rust/Corrosion between back-to-back angles.
4	L7-L8	Lower Chord (West)	One rivet on the top of the L8-L7 - L7-L8 strapping plate with 40% loss. Rust/Corrosion between back-to-back angles.
4	L8-L9	Lower Chord (West)	Up to 1/8" deep SL 1.5" long on the outside corners of the west angles near L9, up to 1/8" deep SL up to 3'-6" Long on the outside corners of the west angles near midspan, up to 1/2" deep SL up to 2'-5" long on the outside corners of the west angles near L8. Holed through batten plate. Rust/Corrosion between back-to-back angles. Lower west angles bow outward 1/4" over the length of the member.
4	L9-L10	Lower Chord (West)	Rust/Corrosion between back-to-back angles. Up to 1/8" deep pitting on the bottom of the connection plate at L9. 1/16" deep x 1" wide x full height pitting on the west face along the L9 gusset plate.
4	L10-L11	Lower Chord (West)	

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspected	Hours	Date
King County	Truss Members	6	6/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlot	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Diagonal and Vertical Members

Span	Location	Detail Description	Remarks
4	U1-L2	Diagonal (West)	
4	U2-L3	Diagonal (West)	
4	U3-L4	Diagonal (West)	
4	L3-U4	Diagonal (West)	Upper portion is buckled 1/2" over the length.
4	U4-L5	Diagonal (West)	
4	L4-U5	Diagonal (West)	Buckled less than 1/2" over the length.
4	U5-L6	Diagonal (West)	Buckled downward 1/2" over the top half and 1/2" upward over the bottom half.
4	L5-U6	Diagonal (West)	
4	U6-L7	Diagonal (West)	No defects found.
4	L6-U7	Diagonal (West)	1/2" buckling up, down, east, and west, over the length.
4	U7-L8	Diagonal (West)	
4	L7-U8	Diagonal (West)	No defects found.
4	L8-U9	Diagonal (West)	

General Remarks

Fracture Critical Inspection Report

Agency	Feature Inspection	Hours	Date
King County	Truss Members	6	6/25/19

Bridge Number	Inspector	Title	Identification Number
1726A	Bob Mlsll	Lead Inspector	G1714

Bridge Name	Co-Inspector	Title	Identification Number
Meadowbrook	Ben Roark	Co-Inspector	G1332

Structure Type	Truss or Girder Location
Riveted Pratt Through Truss	West Truss Diagonal and Vertical Members

Span	Location	Detail Description	Remarks
4	L9-U10	Diagonal (West)	
4	L11-U10	Diagonal (West)	One bolt at portal connection is rusted.
4	L1-U1	Vertical (West)	
4	L2-U2	Vertical (West)	
4	L3-U3	Vertical (West)	
4	L4-U4	Vertical (West)	
4	L5-U5	Vertical (West)	
4	L6-U6	Vertical (West)	
4	L7-U7	Vertical (West)	
4	L8-U8	Vertical (West)	
4	L8-U9	Vertical (West)	Plate between angles has rusted through hole. 3/4 rivet heads have rust coloring towards the top end.
4	L10-U10	Vertical (West)	
4	L1-U1	Vertical (West)	

General Remarks

Letter No. 15E

July 10th, 2020

The following comments were assembled by Paul Eisenberg, former Director of Development (2001-2015) at Suncadia Resort, on behalf of Snoqualmie Community Action Network (SCAN) and should be included in the formal record of response to the draft environmental impact statement for the proposed PCIP development of the Snoqualmie Mill property.

1. **General comment regarding performance assurances.** This owner / developer has a past history of non-compliance with codes and regulations (see: references to stormwater discharge reporting violations, permitting for temporary parking lot). Given this, for each and every mitigation obligation a completion and maintenance bond or surety should be required to all for payment of those obligations when the developer fails to properly comply. Otherwise the burden will fall on taxpayers who receive little or no specific benefit from the project and who should not have to incur the costs of any future non-compliance. 15E-1

2. **General comment regarding long term financial, management, funding, open space ownership.** The project proposes creating a substantial amount of permanent open space, placing some of it into conservation easements, and other open space into flood mitigation, new wetlands and wetland buffers. Once development is complete there will no longer be a developer to manage these assets, own them or pay for their maintenance and repair. The mitigation work that will have been completed must mitigate for the life to project long after the development work is completed. That means every long mitigation item must have a plan for long term ownership, management and maintenance of that mitigation. Conservation easements are held by an entity in perpetuity and a perpetual funding source must be provided for the easement. Wetland and wetland buffers, general open spaces must be managed and maintained. This probably means that one or more non-profit property owner associations must be created, governance mechanisms created, assessments levied against benefitted properties, with developer funded subsidies of those entities until full project build out and self sustaining funding is achieved to assure perpetual maintenance of all such assets. While I did not complete a review of the entire plan, I did not see any such plans, budgets, mechanisms proposed. They should all be required. The mitigation discussed only references some vague CC&R's with no description of any mechanism for enforcement. It is easy to focus only on the construction and development phases and fail to completely and carefully construct the tools, resources and mechanisms needed to provide for perpetual management and maintenance. 15E-2

3. **Wetland buffer adjustments.** Wetland buffers adjustments are only supposed to occur when there is no other viable option. Then there should be a net increase in buffer size. Also if wetlands themselves are disturbed there should be a 150% replacement factor. The basis for needing buffer adjustments and proposed mitigation does not seem adequately investigated or analyzed or. Per 1 above, wetlands buffers and wetland replacements typically have a low success rate and a high failure rate, so bonding and performance security needs to be provided to ensure this mitigation burden does not fall on the taxpayers. 15E-3

4. **Pandemic.** Given the impacts of Covid-19 the evaluation of land use needs should be revisited. It is likely that future retail patterns and uses will be different than pre-covid-19. 15E-4

5. **Schools.** The DEIS seems to dismiss school impacts with little analysis, despite the fact that housing is proposed. There should be a more detailed analysis of the impact including evaluation and written findings from the affected school districts regarding the impact per student and the required capital impacts on a per student basis. Then mitigation should be proposed based on the number of students expected to be generated from that housing, with a future periodic review and adjustment should actual student impacts exceed the estimated impacts. 15E-5

6. **Traffic impact analysis seems inadequate.** The project will include a 5,000 seat amphitheater and stage to be used twice a week. That creates two very large traffic impacts per week, far beyond the operation of the commercial facilities and the housing. Additionally, the conservation easement lands and trails and river access will invite more public use. The traffic analysis does not seem to adequately assess these impacts or mitigation for them, including the provision of adequate parking and public transportation options. 15E-6

7. **Seismic risks.** The site sits on loose sands and soils subject to liquefaction. Ground shaking of certain soil types creates liquefaction failures, however, saturated soils subject to liquefaction are far more dangerous and liquefaction far more severe than dry soils. The DEIS dismisses these problems with mere mention, but does not address or analyze the threats to life and property that can occur. The project needs to be evaluated in consideration of the expected very large offshore subsidence earthquake that is expected in the near future. An analysis of an earthquake of the expected magnitude needs to be studied. Then very specific mitigation needs to be imposed, assuming these risks can be mitigated at all. This type of seismic failure is one of the most difficult seismic risks to mitigate. Improvements literally sink into the ground. It is not sufficient to merely mention the risk. 15E-7

8. **Air quality impacts.** Air quality impacts are dismissed by stating the percentage of the total carbon and pollution that the proposed project represents, essentially stating that no mitigation is required. Mitigation is intended to eliminate the impacts that this project provides directly, such that it does not add to the problems. All of the air quality impacts need to be determined and assessed, then mitigation efforts need to be designed and proposed that will result in no impact. Removing and replacing trees and vegetation only contributes to mitigation to the extent that there is a resulting net increase in mitigation. Offsite mitigation efforts may be required. Other mitigation is required to reduce operational carbon energy and embedded carbon construction impacts. The DEIS fails to adequately measure the impacts or mitigate for them. 15E-8

9. **Green energy.** Green energy, recycling, green construction, electric vehicle charging stations, etc. all need to be analyzed for mitigation. Mitigation of heat created by new hard surfaces is required. 15E-9

10. **Flooding and flood plan and zero rise.** The entire area is very problematic because the entire basin drains over Snoqualmie Falls. Thus in 100 year or higher flood events the rate that water can exit the basin is physically constrained. While lowering the weir at the Falls was part of a mitigation plan, achieving a net zero rise is nearly impossible for a site that lies largely with the inundation area. The plan proposes many tens of thousands of square feet of new buildings that will have to be constructed at elevations above the floodplain. That means less land that currently lies above the flood contours will be available to absorb flood waters during events. There needs to be a much more detailed analysis of flood events, with 6 inch storm increments, looking at the entire site, with adequate quantitative calculations demonstrating that zero rise can actually be accomplished at each flood stage, based on site grading, excavations, improvements, etc. And comparing existing conditions with those future conditions to fully prove that no net rise can actually be achieved. 15E-10

11. **Wildlife.** The analysis of impacts on wildlife is inadequate. While it describes what species are present, it does not describe what the actual impacts on wildlife will be, nor what mitigation efforts and techniques are proposed to offset those impacts. Discussion of wildlife does not equate to mitigation of impacts. What changes to migration patterns? Changes to water access? Changes to the sensitive habitat? Impacts on neighboring properties do to disruptions? Impacts during construction? 15E-11

12. **Operational impacts.** The assessment of operational impacts is very inadequate and dismissive of impacts. There will be impacts on police, fire, schools, water, schools and these all seem inadequately quantified and mitigated. For example, wineries are notoriously problematic for wastewater treatment. When they clean and dump vats, huge quantities of sugars and fermentation products and organic wastes are released. When these reach the treatment facility, they completely disrupt the functioning of the microbial balance in the bioreactors and can completely disrupt treatment processes. Additionally, vat cleaning and sterilization products can be very harmful. Most small treatment facilities simply cannot handle these problems and major capital improvements are often required. These problems are not analyzed, nor the ability to mitigate them. Sanitation for the amphitheater is not analyzed, but with crowds of up to 5,000 people twice per week, will cause impacts. 15E-12

13. **Water and water runoff treatment.** The proposal intends to use the wetlands to treat surface water runoff. Currently most of the site is not paved. The new added roof acreage and impervious surface acreages will load the wetlands to a far greater extent than current conditions. Winery site wash downs will add sugars and other products to the storm water flows. There needs to be far more detailed and careful quantitative analysis of the water quality impacts on the wetlands. Raised temperatures, rates and quantities and pollutants in the runoff could severely damage the wetlands and exceed their ability to provide treatment. Again, a discussion of impacts is not the same as full analysis and mitigation. 15E-13

14. **Stormwater and recharge.** Storm water runoff and recharge during normal conditions is not adequate analysis. There needs to be analysis and study of what will occur during flood events of various stages. Such a study should look at existing and proposed contours and elevations at 15E-14

every elevation of a flood. There will be no recharge during flooding, and the wetlands will provide no stormwater treatment during flooding. There is no discussion of, nor proposed mitigation for those impacts during storm events. Pollutants from impervious surfaces will flow directly into the Snoqualmie River, and affect everything downstream of the project. There is no discussion of these impacts and no proposed mitigation. For example, what happens to winery runoff? Asphalt surface runoff? Hazardous materials in the contamination sites? 15E-14

15. **Cultural issues First Americans.** The cultural analysis and mitigation is totally inadequate. This area was hunting and fishing and living space for First Americans for thousands of years. A spearhead was found near the controversial Tokul Road roundabout site. The Snoqualmie had approximately 90 long houses along the Snoqualmie River the locations of which need to be documented in consultation with the Snoqualmie Tribe to determine whether any of those or other significant artifacts exist within the project site. There has not been a thorough site exploration or investigation or consultation with the tribes to determine potential locations of important cultural resources that may not be fully mapped. In fact, instead of fulfilling these obligations Snoqualmie has been in a running conflict with the tribes over their issues. The DEIS should contain a detailed and serious history, documentation, site surveys, and consultation results. 15E-15

16. **Cultural issues logging / milling.** This site clearly contains many improvements and artifacts that are old enough to qualify for archeological and historical significance. This DEIS should contain historic photographs, historic accounts, a complete inventory of, maps of, or descriptions of, and current photographs of each artifact, with a professional assessment of its cultural and historical importance. The DEIS is grossly deficient in this regard. 15E-16

17. **Legacy contaminants.** The DEIS is inadequate. It is improper to dismiss these known toxic hazards by simply stating that these are not considered a project impact. That is a profound error in the DEIS and its intent and it is dangerous. These toxins are on the project site and must be fully and completely evaluated, not dismissed. Mass grading will occur. Filling will occur. Hydrological changes will occur. There needs to be thorough hydrological testing to determine if any toxic leaching, seepage, or movement has occurred. Potential effects of erosion need to be studied. The adjacent Snoqualmie River has a designated meandering channel. The area is subject to extensive flooding. The site is subject to seismic liquefaction. More people will come to the site. This hazardous site and material needs to be mitigated. The development may produce changes that might cause these toxins to be released into the environment. There needs to be a complete analysis of the toxic site, the consequences of various occurrences, the consequences of the release of this material into the environment. Leakage into the Snoqualmie could impact all the downstream salmon habitats, and the habitats for endangered fish downstream of the Falls, all the way to, and including the Pacific Ocean. As just one example of the risks, consider seismic liquefaction, which causes the earth to become fluid. With shallow water tables such as those documented across this project site, water is typically forced up as heavier materials sink into the liquefied soils. Combined with loosening of the soils under and above the toxins, making those soils porous, the water upwelling would bring those toxins to the surface and distribute the toxins across the site and probably contaminate The 15E-17

wetlands and the Snoqualmie River, contaminating everything downstream. A major seismic event coupled with a 100 year flood could create an environmental disaster. An extreme channel meander could impact the site. It is probable that the material needs to be excavated and transported to a site outside of the liquefaction zone and away from any body of water that it could contaminate. However, without thorough and complete study and analysis it is only possible to speculate.

15E-17

Letter No. 15F

July 10th, 2020

Re: Additional Comments to the DEIS of the Snoqualmie Mill P n

Our review teams filed several public records requests for documents that are necessary for our understanding and analysis of the DEIS. These requests have not been fulfilled by the City in a timely manner. The result is that as of the comment filing deadline we still have not received many of our requested documents. We have received some documents, a chunk of which were only made available today, the filing deadline. A significant amount of documents that we have requested have not been provided, due in part to the City Council's decision to limit the amount of time that the City staff is permitted to devote to PRRs. Given that this decision was made by the Council, the City has an obligation (morally, if not legally) to greatly extend the deadline for comment on the DEIS. 15F-1

Therefore, we have respectfully requested for the City to provide a reasonable extension so that we may be able to provide additional comments informed by the documents that we are just now receiving from the City. A reasonable approach would be for the City to allow ten days from the date that the City fulfills the last of any public disclosure requests that were submitted prior to today.

We are making our best efforts to comment on documents that we received today. The best that we can do at this point is to offer the following facts, issues and topics that we want to be considered. These comments are supplementary to our more detailed comment letters that are being submitted in this same packet but as separate documents. Since we have a number of individuals and consultants working on various issue areas, these comments cannot be submitted in the same kind of organized-by-issue-area, structured format that we have employed with our other comments. Moreover, some of these comments may touch on the same issues, or even be duplicative, of our other comment letters. 15F-2

With that, we offer the following comments:

1. The development primarily serves regional urban uses, but will have negative impacts on the surrounding rural and resource areas. This is contrary to Countywide Planning Policies. Adopted regional SEPA planning documents did not consider the impacts of this large development on rural and resource areas, so that deficiency should be addressed in the DEIS. 15F-3

2. The Transportation analysis does not adequately consider "SEPA gaps" that will occur because of the City's inadequate transportation concurrency management system.

3. "SEPA gaps" exist because the City's adopted code and processes regarding stormwater, groundwater, and flooding impacts will not provide adequate conditions to address all significant adverse environmental impacts.

15F-4

4. The DEIS does not consider the probability that the project will violate adopted health department noise standards.

15F-5

5. Impacts to all affected offsite properties are not considered.

6. Impacts to neighboring jurisdictions and tribes are not fully considered.

15F-6

7. The DEIS does not consider the cumulative impacts of approved and pipeline projects in the region and surrounding areas together with the proposed project's impacts.

15F-7

8. The DEIS does not consider all relevant environmental reviews that have been conducted by King County and other agencies on the site and on properties that will impact or be impacted by the proposed development.

15F-8

9. The DEIS should do more than merely *identify* issues that the City Council retains discretionary authority to approve or disapprove flexibility options under SMC 17.20.050 and 19.12.170. The DEIS should identify and consider the impacts from the full range of discretionary options available under the code. SEPA's purpose is to inform decision makers about the environmental impacts of their actions, and this should include the full range of future actions that could be taken during the PCI and Development Agreement review.

15F-9

10. The DEIS assumes that floodplain impacts will be evaluated later during subsequent development reviews. SEPA requires impacts to be evaluated at the earliest time that impacts can be reasonably known. Detailed analysis at this point in the development review process will provide for the widest range of options regarding land uses, locations, and mitigations. The project is described in sufficient detail to allow for a thorough review in the DEIS.

15F-10

11. The DEIS assumes no impact to air quality or greenhouse emissions based on the assumption that since there are no adopted emission standards, no impact can be identified. SEPA requires the evaluation of impacts regardless of whether there are adopted standards. Additionally, greenhouse gas emissions from this large project site can and should be estimated and evaluated separate and apart from the City's overall emissions.

15F-11

12. The DEIS should not just list toxic chemicals that are present on the site; it should identify and evaluate the health and environmental risks associated with each chemical along with a risk analysis of the potential for release into the environment. 15F-12

13. The DEIS should not defer the characterization of contaminants to a later point for Phases 2 and 3. Moreover, the characterization of Phase 1 is insufficient. The document has no reasonable basis for its determination that there is a low risk of release, fire or explosion. 15F-13

14. Steep slopes adjacent to Phases 2 and 3 should be evaluated now. Considering these impacts only programmatic may preclude future mitigation options. 15F-14

15. The stormwater treatment for the site is near the edge of the Snoqualmie River. Given that the Department of Ecology requires enhanced treatment within ¼ mile of any fish-bearing waters, and given the size of the site and the applicant's non-compliance with their construction stormwater permit to this point, the basic treatment identified in the proposed site drawings is insufficient. The stormwater treatment needs to be "enhanced" to treat for metals, phosphorous and other common pollutants. If not, there will be harm to fish and downstream waterways. The downstream Snohomish River is listed as Category 5 by DoE under the Clean Water Act. 15F-15

16. Impact on police services is insufficiently evaluated in the DEIS. While the Comprehensive Plan calls for evaluation over time based on call volume, this cannot be used for project evaluation where specific details of proposed development are known, such as the Mill Site. The applicant must fund a study of equivalent types of development and the call volume and other impacts they generate on police services. From this information, the appropriate mitigation can be set. 15F-16

17. This project will have an impact on the capital facilities of the city. The DEIS fails to adequately identify these impacts. What will be the additional demand on public works equipment and facilities? Is the size of city hall and the police station adequate to house the additional administration costs, etc? The EIS can and should identify capital impacts in a more specific way. Given that Snoqualmie is a relatively small city, a project of this size will have a noticeable impact. The DEIS should include a comparison of similar businesses and land 15F-17

uses in other cities and require construction of capital facilities or fees to mitigate.

15F-17

Submitted to the official record by representatives and consultants of the Snoqualmie Community Action Network (SCAN)

Letter No. 16

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Kathryn Graham <kwiggett@hotmail.com>
Sent: Friday, July 10, 2020 10:32 PM
To: Shared Mill Site EIS
Subject: Written comment regarding Mill Planned Commercial/Industrial Plan - Draft Environmental Impact Statement
Attachments: CitySnoqualm_2011_SnoMillStaffSum (1).pdf; MillSitePublicComment_July2020_KGraham.pdf

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,
As a resident of Snoqualmie, member of the Snoqualmie Community Action Network (SCAN), and member of the Sierra Club, I am writing to express concerns regarding impacts to environment health, water resources, building design, and noise. The attached documents include my written comments and a reference document mentioned in the comments. The attachments are:

1) MillSitePublicComment_July2020_KGraham.pdf
2) CitySnoqualm_2011_SnoMillStaffSum (1).pdf

I hereby include, by reference:

- The letter from King County Permitting Division, Department of Local Services to Mark Hofman, submitted 7/10/2020 (but erroneously dated 7/13/2020 in the body of the letter)
- The letter from King County Department of Natural Resources and Parks, Historic Preservation Program to Mark Hofman, dated 7/9/2020
- Expert consultant's reports submitted by SCAN to Mark Hofman on 7/10/2020:
  - DN Traffic Consultants report dated 7/3/2020
  - Cooke Scientific report dated 7/9/2020
  - Practical Environmental Solutions report dated 7/10/2020
- The letter from Bricklin & Newman LLP to Mark Hofman on behalf of SCAN dated 7/10/2020

I also include by reference letters from the Department of Ecology Toxics Cleanup Program, Wetlands and Shorelands Program, and Water Quality Program, all sent to Mark Hofman on or around July 10th, 2020, which our organization has been assured exist by SCAN's consultant Sarah Cooke, but which I have not seen.

Thank you for the taking time to read through my comments and references.

Sincerely,
Kathryn Graham

SCAN

Kathryn Graham
7115 410th AVE SE
Snoqualmie, WA
98065

July 10, 2020

Mark Hofman, SEPA Responsible Official
City of Snoqualmie
P.O. Box 987
Snoqualmie, WA 98065

Sent via email: MillSiteEIS@snoqualmiewa.gov

RE: Public Comments on the Draft Environmental Impact Statement (DEIS)

Dear Mr. Hofman,
As a resident of Snoqualmie, member of the Snoqualmie Community Action Network (SCAN), and member of the Sierra Club, I am writing to express concerns regarding impacts to environment health, water resources, building design, and noise.

I hereby include, by reference:

- The letter from King County Permitting Division, Department of Local Services to Mark Hofman, submitted 7/10/2020 (but erroneously dated 7/13/2020 in the body of the letter)
- The letter from King County Department of Natural Resources and Parks, Historic Preservation Program to Mark Hofman, dated 7/9/2020
- Expert consultant's reports submitted by SCAN to Mark Hofman on 7/10/2020:
    - DN Traffic Consultants report dated 7/3/2020
    - Cooke Scientific report dated 7/9/2020
    - Practical Environmental Solutions report dated 7/10/2020
- The letter from Bricklin & Newman LLP to Mark Hofman on behalf of SCAN dated 7/10/2020

I also include by reference letters from the Department of Ecology Toxics Cleanup Program, Wetlands and Shorelands Program, and Water Quality Program, all sent to Mark Hofman on or around July 10th, 2020, which our organization has been assured exist by SCAN's consultant Sarah Cooke, but which I have not seen.

16-1

Thank you for the taking time to read through my comments and references.

Sincerely,
Kathryn Graham

SCAN

3.5 Environmental Health –

From the DEIS:

3.5.2. Impacts – Construction Impacts – 3-148

"Construction activities could potentially disturb contaminated areas and cause release or exposure to contaminants in soil. Construction activities in areas of known or suspected contamination would need to be conducted in accordance with state and federal health and safety requirements for handling of potential hazardous materials and for worker safety training until it can be demonstrated that potentially impacted site media do not exceed applicable cleanup levels."

3.5.4. Significant Unavoidable Adverse Impacts – 3-150 to 3-151

"Potential adverse impacts associated with redevelopment and operation of the Snoqualmie Mill property are primarily related to accidental releases of hazardous substances from vehicle accidents, mishaps during construction, or inadvertent spills from tenants' operations. While such impacts can be mitigated, some amount of risk of accident and inadvertent releases would remain regardless of precautions and procedures implemented. The legacy contamination that exists in Planning Areas 2 and 3 is not considered to be an impact of the proposed action; redevelopment of the project site and concurrent remediation would have a significant positive impact on the environment."

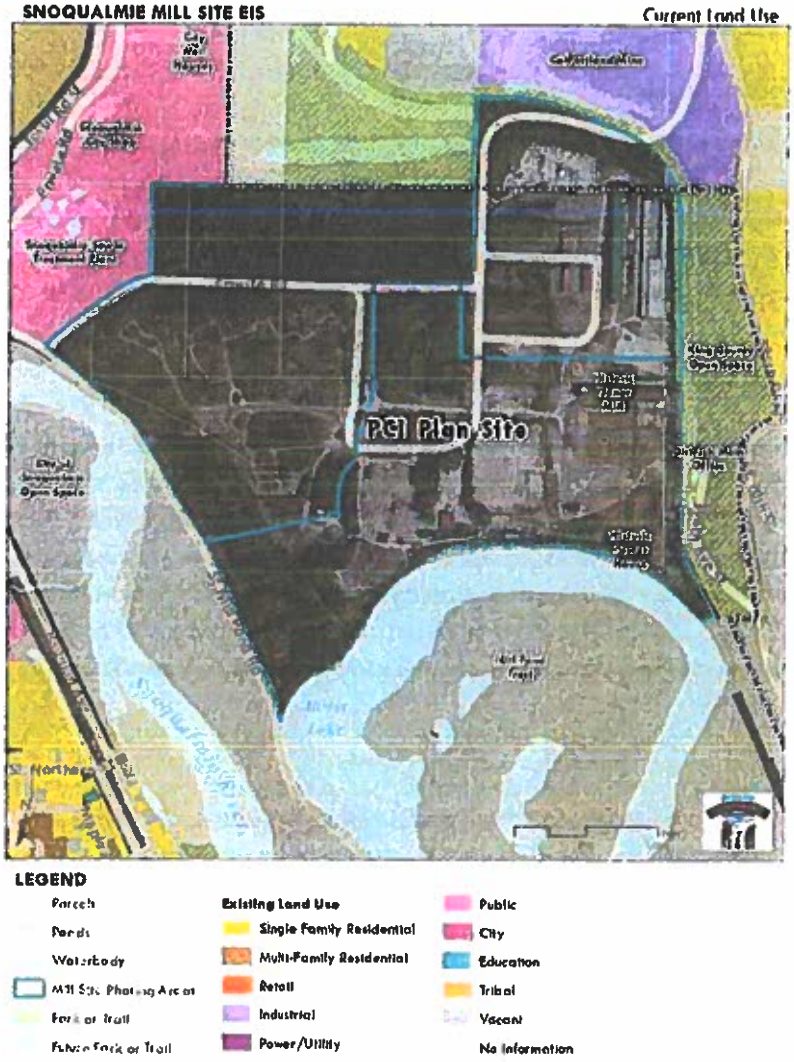
Public comment:

The presence of dangerous, persistent pollutants: polychlorinated biphenyls (PCBs), the Boiler Ash Fill Area, and the Pentachlorophenol (PCPs) in the proposed development site is concerning. The STAFF SUMMARY OF FORMER WEYERHAEUSER MILL SITE document from September 22, 2011 is attached to the original email of this public comment for reference. The pollutants mentioned above are listed in points 2, 4, and 6 in the 2011 STAFF SUMMARY document.

In order to prevent initial or further contamination of the groundwater and surrounding environment, the remediation plan needs to be solid. Review whether there is potential for further contamination to spread to the North Wellfield near Tokul Road – one of Snoqualmie's public water sources (https://www.ci.snoqualmie.wa.us/250/Drinking-Water) – which appears to be shown in Exhibit 3.6-3 from the DEIS. A review in the area should also take place to ensure that no breach would result in private wells in the area. Contamination spread of the pollutants is also a concern in regard to Snoqualmie River and should be reviewed as well.

16-2

Exhibit 3.6-3. Current Land Use Map



Source: King County Assessor, 2017; BERK, 2020.

Guidance provided by Melissa S. Leone, a licensed geologist, regarding the persistent pollutants is as follows:

> *I have reviewed the draft environmental impact statement for the Snoqualmie Mill proposed construction project. These are draft comments based on my limited time reviewing documents.*
>
> *I understand the site has a history of lumber mill activities operating from approximately 1916 to 1989. During historical site use there were releases of several contaminants of concern to soil and groundwater. These contaminants of concern (COCs) include petroleum hydrocarbons (including gasoline and diesel) and related compounds including benzene, toluene, ethylbenzene, and xylenes, from USTs/ASTs, PAHs and metals from boiler ash used as fill, PCBs from electrical transformers, and chlorinated phenolic compounds (Including PCP) for treating wood.* 16-3
>
> *Between 1989 and 2006 several environmental consulting firms conducted environmental remedial activities primarily via excavation and bioremediation. During these remedial activities many of the COCs were reduced to levels below relevant MTCA cleanup levels, however there are COCs remaining at concentrations exceeding MTCA standards in some areas. There remains concentrations*

of COCs in soil and groundwater in areas across the site that will need to be addressed during phase 2 and phase 3 construction on site, particularly the PCBs in a perched groundwater zone above a clay layer aquitard. Also during phase 1 of construction if there is any proposed deep foundation work and or dewatering at the site it would be prudent for the earthwork contractor to have a licensed hydrologist involved to ensure no groundwater contamination migrates from Phase 2 or 3 into phase 1, and/or the clay layer aquitard is not breached. The contaminated areas of the site mainly are in phase 3 of the proposed construction area, which was primarily where the lumber mill foot print was located. Phase 1 does not appear to be in the area of concern of legacy chemicals that remain following historical remedial activities, however more characterization of the site would be helpful to delineate the boundary.

16-3

These recommendations are based on limited review of site documents.

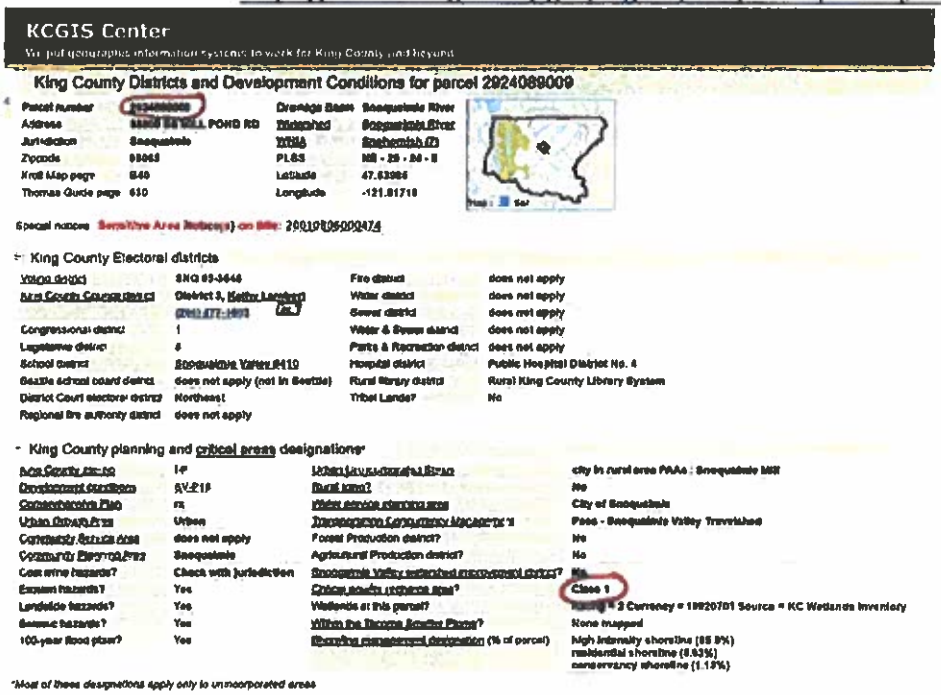
Thank you,

Melissa S. Leone, LG

Taking into consideration the persistent legacy pollutants are adjacent to and appear to be in critical aquifer recharge areas (parcel 2924089009 – the proposed development area – is classified as Class 1), ensuring that a solid plan to eliminate or at least reduce impacts of construction is prudent.

16-4

Parcel 2924089009: https://www5.kingcounty.gov/kcgisreports/dd_report.aspx?PIN=2924089009



Excerpt from 3.3. WATER RESOURCES - 3.3.1. Affected Environment – Groundwater Features – Critical Aquifer Recharge Areas – 3-53

"Snoqualmie's critical area regulations (SMC 19.12.200) define Critical Aquifer Recharge Areas (CARAs) as follows:

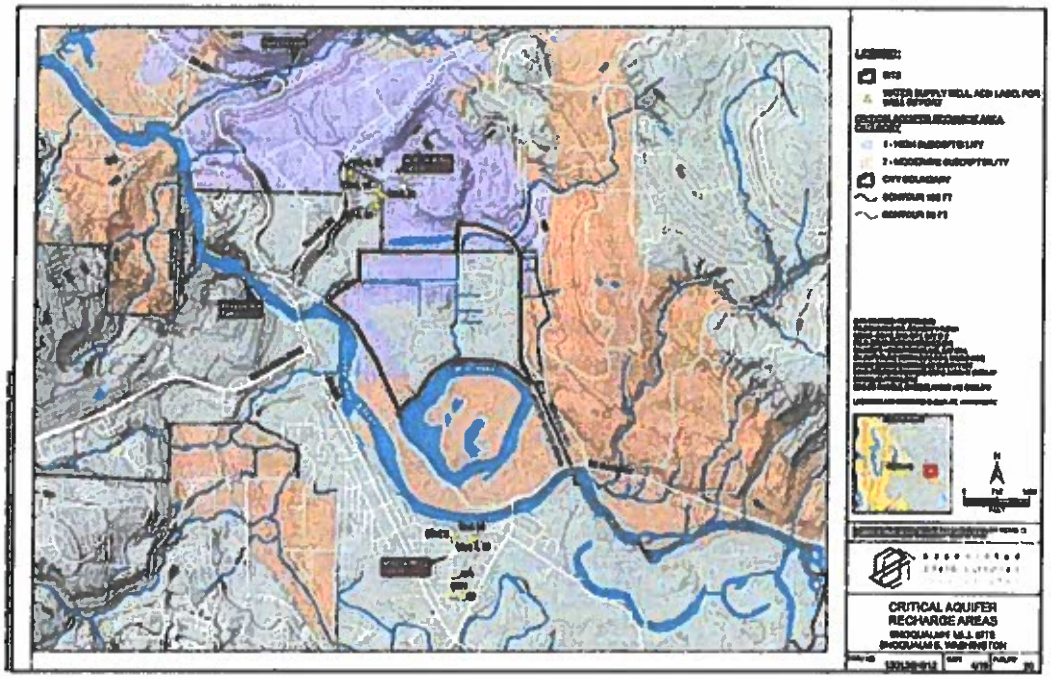
1. Category I critical aquifer recharge areas include those areas mapped by King County and are determined to be highly susceptible to groundwater contamination and that are located within a sole source aquifer or a wellhead protection area.

2. Category II critical aquifer recharge areas include those areas mapped by King County and determined to:
    a. Have a medium susceptibility to ground water contamination and located in a sole source aquifer or a wellhead protection area; or
    b. Are highly susceptible to ground water contamination and are not located in a sole source aquifer or wellhead protection area.
3. Category III critical aquifer recharge areas include those areas mapped by King County and determined to have a low susceptibility to groundwater contamination.

CARAs in the vicinity of the Mill site are shown on Exhibit 3.3-2, based on 2012 King County Critical Aquifer Recharge Area mapping. The area immediately surrounding the Snoqualmie Mill site to the north, and portions of the site on the west and northwest parts of the property are classified as a Category 1 CARA. The areas mapped as Category 1 CARA appear to generally correspond to the mapped 10-year TOT wellhead protection areas (WPAs) for groundwater production wells. The area immediately south of the Mill site, including the Mill Pond, and portions of the site on the southeast and southwest parts of the property are classified as a Category 2 CARA. Most of the Mill site, however, is not classified.

The City's regulations prohibit certain uses or activities in a Category 1 CARA (SMC 19.12.200(C)) and require that a hydrogeologic assessment to be completed prior to approval of certain allowed activities or uses (SMC 19.12.200(F)). Storage tanks constructed in a CARA need to comply with containment and corrosion protection requirements and other uses such as agriculture, sewage disposal, golf courses, and vehicle repair need to implement best management practices with respect to their operations."

Exhibit 3.3-2. Critical Aquifer Recharge Areas



Source: AESI, 2020.

3.3 Water Resources – 3.3.1. Affected Environment – Regulatory Environment – 3-46

"The site lies entirely within the Snoqualmie River Basin and currently drains to the Snoqualmie River from one "threshold discharge area." Drainage leaves the site at three locations:

- Directly to the river via overland flow,
- Through Borst Lake (or the old Snoqualmie Mill Pond) via on-site ditches (Borst Lake drains over a manmade outlet weir and culvert under Mill Pond Road to the Snoqualmie River), and
- Through the Northeast portion of the site that drains to the river via a large off-site wetland complex lying north of the property. The entire site (except some areas of the site above the Base Flood Elevation) as well as immediate downstream areas lie within the 100year floodplain of the river."

2.3. PROPOSAL AND ALTERNATIVES – Building Types and Design – 2-19 and 2-20

From the DEIS:

"Office buildings in Planning Areas 2 and 3 would be constructed by a corporate or institutional user, who would determine building materials and design consistent with the Snoqualmie Mill property design guidelines. Office buildings could also be up to 55 feet (4-5 stories) in height.

Several mixed-use buildings are proposed along the main street in the Planning Area 1 village, along the main street. These would be up to 5 stories in height (60 feet, measured to the midpoint of the roof, 70 feet to the peak), of wood frame construction over a concrete podium. Residential units would be located on the second floor or higher, above flex space, which would be a mix of retail, office and light industrial. Residential units would be for rent at market rates and would be a mix of 1- and 2-bedroom units."

Public comment:

Snoqualmie Municipal Code (SMC) 17.20.040 shows that the maximum building height for PCI zoned land parcels is 40 feet. Given that the proposed building heights in the DEIS in all three phases range from 55 to 70 feet, these deviate significantly from current code. The proposed building heights should be revised to be in accordance with the code.

16-5

17.20.040 Area, height, setback and miscellaneous provisions.
A. Table 17.20.040-1 indicates restrictions and regulations for the lot area, setbacks, and height of all structures permitted in the commercial districts, subject to the additional provisions for height set forth in subsections C, D and E of this section

Table 17.20.040-1 – Restrictions and Regulations for Lot Area, Setbacks, and Height for Structures in Commercial Districts

	Zoning District					
	BD	BC	BR	DP	PCI	I
1. Minimum Lot Area (square feet)	5,000	6,000	3,600	9,000	9,000	10,000
2. Minimum Lot Width	30'	30'	30'	30'	none	none
3. Minimum Front Yard Setback[1]	0	0	0'	10'	20'	20'
4. Minimum Side Yard Setback[1]	0	0	0'	10'	10'	10'
5. Minimum Rear Yard Setback[1]	0'	0'	0'	10'	10'	10'
6. Maximum Height of Structure[2]	35	35	35'	35'	40'	40'

[1] Where a zone boundary line divides a lot, setbacks shall be required on the side of the zone boundary line.

[2] A height of 45 feet may be permitted for a residential use

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3.12 Noise

From the DEIS:

3.12.4. Significant Unavoidable Adverse Impacts – 3-343

"Noise from operation of the amphitheater, which is only included in the Redevelopment Alternative, may be perceived at some residential locations depending on when the facility operates, but is nevertheless expected to comply with applicable sound level limits.

The surrounding properties to the north and east are located in unincorporated King County and are zoned for mineral (M) and rural residential use (RA-5), respectively."

pg. 3-336

"The noise assessment assumed that loud music performances could occur, with amplified instruments (drums, guitars, bass and vocals) and a PA system rated to reach an audience within the entire amphitheater seating area."

Exhibit 3.12-10 provides a tabular summary of the sound source used for this assessment, including the estimated sound level.

Exhibit 3.12-10. Noise Source Summary for Amphitheater

Source Type	Approximate Sound Level at 50 feet (dBA)
Amphitheater	**97 dBA [1]**

Source: Ramboll, 2019.
[1] Sound pressure level based on sound level measurement taken by Ramboll.

Public comment:

The noise impact of the amphitheater is worthy of particular attention. According to exhibit 3.12-1 Common Sound Levels and Sources on page 3-325 of the DEIS, the sound level of a "loud rock band" is listed at 130 dBA. The assessment in the DEIS, as mentioned above, assumed "loud music performances". There is a significant discrepancy between 130 dBA and 97 dBA – both of which came from the DEIS.

Exhibit 3.12-1. Common Sound Levels and Sources

Thresholds/Noise Sources	Sound Levels (dBA)	Subjective Evaluations[1]	Possible Effects on Humans[1]
Human Threshold of Pain **Carrier jet takeoff at 50 ft**	140	Deafening	Continuous exposure to levels above 70 can cause hearing loss in the majority of the population
Siren at 100 ft **Loud rock band**	130		
Jet takeoff at 200 ft **Auto horn at 3 ft**	120		
Chain saw **Noisy snowmobile**	110	Very Loud	
Lawn mower at 3 ft **Noisy motorcycle at 50 ft**	100		
Heavy truck at 50 ft	90	Loud	Speech interference
Pneumatic drill at 50 ft **Busy urban street, daytime**	80		
Normal automobile at 50 mph **Vacuum cleaner at 3 ft**	70		
Air conditioning unit at 20 ft **Conversation at 3 ft**	60	Moderate	
Quiet residential area **Light auto traffic at 100 ft**	50		Sleep interference
Library; Quiet home	40	Faint	
Soft whisper at 15 ft	30		
Slight rustling of leaves	20	Very Faint	
Broadcasting Studio	10		
Threshold of Human Hearing	0		

Source: EPA 1974 and Others
[1] Note that both the subjective evaluations and the physiological responses are continuums without true threshold boundaries. Consequently, there are overlaps among categories of response that depend on the sensitivity of the noise receivers.

Understanding that there are several factors that affect the transmission of sound, analysis of the project impacts surrounding existing residences, the proposed residential units in phase 1 of the project,

16-6

and other receiving areas should be revisited to determine if the sound level produced from the amphitheater would realistically "comply with applicable sound level limits."

King County Code (KCC) is copied below to reference "public nuisance noise" and "public disturbance noise" that both are defined as "any sound that unreasonably disturbs or interferes with the peace, comfort or repose of a person or persons." Additionally, the KCC states, "A noise need not exceed the maximum permissible sound levels of this chapter or be a public disturbance noise, as described in K.C.C. 12.86.410, in order to be a public nuisance noise." and "A noise need not exceed the maximum permissible sound levels of this chapter or be a public nuisance noise in order to be a public disturbance noise."

One of the many special characteristics of this valley is that residents can enjoy the sounds of the natural surroundings. The sounds of an outdoor performance space could potentially detract from that enjoyment and interfere "with the peace, comfort or repose".

Since there are residences within hearing range of the proposed amphitheater location, whether or not performances on that stage would be within acceptable limits should be revisited.

Exhibit 3.12-2. City of Snoqualmie/King County Maximum Permissible Sound Levels (DBA)

	District of Receiving Property Within King County/Snoqualmie			
District of Sound Source	Rural Day/Night[1]	Residential Day/Night[1]	Commercial	Industrial
Rural	49/39	52/42	55	57
Residential	52/42	55/45	57	60
Commercial	55/45	57/47	60	65
Industrial	57/47	60/50	65	70

Source: KCC 12.86.110; SMC 8.16.050 H
[1] The limitations for noise received in Rural and Residential Districts are reduced by 10 dBA between 10 p.m. and 7 a.m. during weekdays, and between 10 p.m. and 9:00 a.m. on weekends.

16-6

For use as an example of properties zoned as RA-5:

- Parcel number 1924089042 is to the north of the proposed development of the amphitheater if it occurs.
- Parcel number 2924089001 is to the east of the proposed development of the amphitheater if it occurs.

As referenced in the DEIS, Snoqualmie Municipal Code (SMC) 8.16.050 states:

> **8.16.050 Other public nuisances declared.**
> Without limitation of the generality of the definition of public nuisance set forth in this chapter, the following acts, omissions, conditions and things are declared to be and constitute public nuisances, subject to abatement as provided in this chapter:
>
> H. Creating, or permitting to be created, any noise in excess of that allowable under King County Code Chapter 12.88, Environmental Noise Levels, as it exists or may be amended at or after the effective date of the ordinance codified in this chapter, which is incorporated in this chapter by this reference;

Note: Again, as mentioned in the DEIS, the correct reference should be to King County Code 12.86 not 12.88.

According to King County Code Title 12 Public Peace, Safety and Morals:

12.86.400 Public nuisance noise.

A. It is unlawful for any person to cause, or for any person in possession of property to allow to originate from the property, sound that is a public nuisance noise. For the purposes of this section, "public nuisance noise" means any sound that unreasonably annoys, injures, interferes with or endangers the comfort, repose, health or safety of a community or neighborhood, although the extent of damage may be unequal.

B. A noise need not exceed the maximum permissible sound levels of this chapter or be a public disturbance noise, as described in K.C.C. 12.86.410, in order to be a public nuisance noise. (Ord. 18000 § 70, 2015: Ord. 14114 § 9, 2001: Ord. 3139 § 501, 1977. Formerly K.C.C. 12.92.010).

12.86.410 Public disturbance noise.

A. It is unlawful for any person to cause, or for any person in possession of property to allow to originate from the property, sound that is a public disturbance noise. For the purposes of this section, "public disturbance noise" means any sound that unreasonably disturbs or interferes with the peace, comfort or repose of a person or persons. The hour of the day at which the sound occurs may be a factor in determining reasonableness. Sounds that are public disturbance noises may include, but are not limited to: 16-6

1. The frequent, repetitive or continuous sounding of any horn or siren attached to a motor vehicle, except as a warning of danger or as specifically permitted or required by law;

2. Frequent, repetitive or continuous sounds in connection with the starting, operation, repair, rebuilding or testing of any motor vehicle, motorcycle, off-highway vehicle, watercraft or internal-combustion engine;

3. The use of a sound amplifier or other device capable of producing or reproducing amplified sound upon public streets for the purpose of commercial advertising or sales or for attracting the attention of the public to any vehicle, structure, or property or the contents therein, except as permitted by law, and except that vendors whose sole method of selling is from a moving vehicle shall be exempt from this subsection;

4. Loud and raucous sound generated within one thousand feet of any school, hospital, nursing home or convalescent facility;

5. Loud and raucous sound that emanates frequently, repetitively or continuously from any building, structure or property, including watercraft, located within a rural or residential district or on an adjoining body of water, such as sounds originating from a band session or social gathering;

6. Frequent, repetitive or continuous sound, including but not limited to impulsive or amplified sound such as emanates from an audio device, where the sound is plainly audible or can be felt at fifty feet or more from the source of sound, or three hundred feet or more if the

source of sound is from a watercraft, when the sound is received in a residential or rural district. For the purposes of this subsection A.6, "plainly audible" means any sound that can be detected by unaided hearing faculties of normal acuity, including, but not limited to, being able to detect the rhythmic bass component of music coming from a sound amplifier regardless of whether the title, specific words or artist performing the song can be identified; and

16-6

7. Any sound out of doors that interferes with normal conversation at a distance of fifty feet or more from the source of the sound when the sound is received in a residential or rural district.

B. A noise need not exceed the maximum permissible sound levels of this chapter or be a public nuisance noise in order to be a public disturbance noise. (Ord. 18000 § 72, 2015: Ord. 14114 § 10, 2001: Ord. 10192 § 1, 1991: Ord. 9341, 1990: Ord. 3139 § 502, 1977. Formerly K.C.C. 12.92.020).

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STAFF SUMMARY OF FORMER WEYERHAEUSER MILL SITE

REPORTED ENVIRONMENTAL ACTIVITY & REMEDIATION

SEPTEMBER 22, 2011

City of Snoqualmie staff reviewed several files provided by the EPA and property owner regarding the environmental impacts and remediation activities on the old Weyerhaeuser Snoqualmie Mill Site. Multiple locations on the site could have soil, surface water and groundwater impacts due to the presence of different fuels, chemicals and other fluids stored or used onsite. However, six areas stand out for reported potential impacts and remediation activity: (1) the Former Under- and Above-ground Storage Tanks (UST/ASTs); (2) the Former Plywood Plant; (3) the "Morbark" Area; (4) the Powerhouse & Sawmill; (5) the Lumber Strapping Area; and (6) the PCP Dip Tanks. This document summarizes the remediation guidance, contaminants and known status of the site.

The Washington state Department of Ecology (Ecology) regulates and guides needed site Cleanup Levels (CLs) via MTCA, the Washington State Model Toxics Control Act of 1989.[1] The presence of contaminants does not by itself indicate the need for remediation; it is only when contaminant concentrations reach certain thresholds that they trigger a need for monitoring or removal, usually when they may be of an environmental or human health concern. MTCA provides three methods to determine if cleanup is necessary, the default Method A with specific maximum concentration limits (MCL) per contaminant, and Method B/C, which sets alternate contaminant levels (ACLs) based on the associated risks of actual/future site activity.[2] MTCA is essentially the state counterpart to CERCLA,[3] the federal Superfund law that also provides cleanup guidance. The old Weyerhaeuser Mill Site underwent a Preliminary Assessment (PA) in the Superfund data system CERCLIS in 1991, however it resulted in a "No Further Remedial Action Planned" (NFRAP) designation.[4] As such, cleanup activities would likely move from the EPA to the Department of Ecology (Ecology). The site did not proceed to a Site Inspection, and did not enter the National Priorities List (NPL); NPL sites are what are typically referred to as "Superfunds" in the EPA.[5] Overall, the site is essentially a brownfield, or an "Abandoned, idled or under-used real property where expansion or redevelopment is complicated by the presence **or potential presence** of environmental contamination" (emphasis added).[6]

When contamination is suspected or determined, a landowner may undertake voluntary remediation. Most cleanups within Washington State are Voluntary, without issuance of enforcement orders (for cleanup) from Ecology. This allows site owners more flexibility and often reduces cost, but does not provide binding agency assurance of a cleanup's adequacy.[7] Ecology has various opinion letters it can issue for voluntary clean-ups; one commonly known as a "no further action" letter is often seen as the equivalent that a voluntary cleanup has met with Ecology approval, and that no further work is necessary. It appears that a "no further action" letter was *not* pursued/obtained for this site, reportedly due to associated legal costs.[8] Under Ecology, sites undergo an initial investigation (II), receive a Site Hazard Assessment (SHA) and hazard ranking score under WARM (Washington Ranking Method), which ultimately determines whether a site will be listed on the State Hazardous Sites List (HSL). Ecology records show the Weyerhaeuser site has been awaiting a SHA for an indeterminate period.

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[1] In some reports, TSCA or the federal Toxic Substances Control Act of 1976 also guided some cleanup levels.
[2] Delta Environmental Consultants, Inc., "Level II ESA Report," 2004, p.12.
[3] The Comprehensive Environmental Response, Compensation and Liability Act
[4] EPA Region 10 staff correspondence, 05/19/2011 letter
[5] Phone conversation US EPA Region 10 staff representative.
[6] U.S. Department of Housing and Urban Development, "Brownfield Definition", content last updated 7/30/09. http://www.hud.gov/offices/cpd/economicdevelopment/programs/bedi/bfieldsdefinition.cfm. Cited 07/18/11.
[7] Howard F. Jensen, HCMP Law Offices, "Frequently Asked Questions About the Washington State Model Toxics Control Act." http://www.hcmp.com/index.php?p=1_114-Frequently-Asked-Questions-About-the-Model-Toxics-Control-Act. Cited 7/15/2011
[8] Phone conversation with Weyerhaeuser staff reported that a No Further Action Letter was not pursued due to projected costs.

The identified Contaminants Of Concern (COC) at each location of the old Weyerhaeuser Mill site vary depending on the associated activities. Those listed most include **BTEX** or the gasoline components Benzene, Toluene, Ethylbenzene and Xylene; **TPH/T(E)PH & DRO** or Total (Extractable) Petroleum Hydrocarbons and Diesel Range Organics; **PCP** or Pentachlorophenol; **T/TCBs** or tetra/tri-chlorinated benzenes; and **PCBs**, or polychlorinated biphenyls. Although not as emphasized in the reports, there is some evidence of heavy metals, including arsenic and lead and, to a lesser extent, copper, zinc and cadmium. Asbestos was also mentioned, but appeared addressed under a site-wide remediation program.[9] Location-specific summaries are as follows:

(1) Former Under- and Above-ground Storage Tanks (UST/ASTs) areas were noted for contamination from BTEX (groundwater) and TEPH & DRO (soil; groundwater). Between 1989 and 2005, about 8,387 cubic yards (CY) were processed and, at final testing, soils tested below Method B levels.[10] The process was designed to remove groundwater impacts as well, though the reviewed reports do not indicate that a recommended[11] new S/SW downgradient monitoring well was installed to obtain final groundwater results.[12] The Level II ESA also noted that there were impacted soils under nearby roadways; it is unknown if final soil removal addressed these areas.[13]

(2) The Former Plywood Plant was the site of a 1989 fire, where falling debris damaged the secondary bushings of two transformers (T-17 & T-12) and led to TPH, TCB & PCB contamination.[14] A former Press Pit area remediation achieved TPH soil cleanup targets though no groundwater analysis was conducted, and debris was buried.[15] The PCBs at T-17 were remediated to federal TSCA guidelines by June 6, 1989, and investigations closed,[16] though soils may have been remediated at the T-17 location only to federal levels at the time (50 ppm), which may not meet state standards.[17] Official closure of the other transformer (T-12) site was not possible due to elevated PCB levels in the underlying clay layer.[18] Site treatment included removing 60 CY of soil; excavation was halted so as to not breach the clay lens, whose presence prevented a PCB groundwater release. The site was capped with a geotextile in 1991[19] and, following 1995 reports that PCBs had not migrated into groundwater at the T-12 area,[20] Weyerhaeuser notified EPA Region 10 that No Further Action (NFA) would be taken, though no known response was received from EPA.[21] It is uncertain if the geotextile cap is large enough.[22] It was advised to still pursue a NFA letter from the EPA for this area, and that analysis of PCB pyrolysis isomers may be appropriate, along with deed restrictions, legal area delineation and setting a MTCA B/C ACL.[23] Today the area remains fenced and is posted as a PCB spill area.[24]

(3) The "Morbark" Area had machinery that leaked lube oil, leading to TPH & DRO soil and groundwater impacts.[25] From 1998 to 2004 approximately 2,600 CY of soil was excavated.[26] Tests in 1998 met MTCA A groundwater levels for TPH; MTCA B DRO levels were met in 2004[27] and MTCA B TPH levels were met in 2006.[28] No apparent issues remain at this location.

(4) The Powerhouse & Sawmill area contained the sawmill sash gang and log haul, the powerhouse T-7 transformer, a 50,000 gallon AST and a hog fuel ash area. For most locations, TPH & DRO were the main Contaminants of Concern (COC) in soil/groundwater. Between the log haul and sash gang areas, approximately 1,000 CY of soil were removed; final results showed soils below the MTCA B TPH CLs[29] and that groundwater samples under the sash gang were below MTCA Method A CLs.[30] It is unknown if groundwater under the log haul area is free of DRO as the groundwater sample yield was too low for analysis.[31] The T-7 transformer was tested and found to be PCB free,[32] and the AST area likewise tested free of contamination.[33] In 2003, a Boiler Ash Fill Area was identified west of the former sawmill building,[34] with several soil samples testing above benzo(a)pyrene MTCA A levels and Arsenic detected at 180 mg/kg, above the MTCA A cleanup level of 20 mg/kg.[35] In a later ESA, the ash volume was estimated at 6,000 CY;[36] it was

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[9] Shannon & Wilson Inc., "Level I EA (Environmental Assessment)," 1993, p. 10
[10] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.2.
[11] Advised in the letter to Ms. Bariska of Weyerhaeuser accompanying the 2005 Supplemental ESA for the UST/AST Area, by Delta Environmental Consultants July 19, 2005, p. 3
[12] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.8,9 (sections 4.4; 4.7.1; 5.0)
[13] Delta Environmental Consultants, "Level II Environmental Site Assessment (ESA)," 2004, p. vi, 5.
[14] Ecology & Environment, Inc., "Preliminary Assessment Report, Weyerhaeuser Co. Snoqualmie, WA," 1991, p. 5.
[15] Shannon & Wilson Inc., "Level I EA," p. 4, 5. A CL of 200 ppm was set, below the MTCA A CL of 2000 ppm, as of 2005.
[16] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[17] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[18] Shannon & Wilson Inc., "Level I EA," 1993, p. 2, 3.
[19] Shannon & Wilson Inc., "Level I EA," 1993, p. 3.
[20] Dalton, Olmstead & Fuglevand, Inc. Environmental Consultants, "Additional Assessment of PCB Contamination T-12 Area, Weyerhaeuser Snoqualmie Mill Site," 1994, p 2, 3 & Executive Summary.
[21] Delta Environmental Consultants, "Level II ESA," 2004, p.13.
[22] Dalton et al., "Additional Assessment of PCB Contamination T-12 Area..." 1994, 3.
[23] Delta Environmental Consultants, "Level II ESA," 2004, p.13, 14.
[24] Delta Environmental Consultants, "Level II ESA," 2004, p. 5.
[25] Delta Environmental Consultants, "Level II ESA," 2004, p. 4.
[26] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p.5. & Pacific et al"Permit Closure Report: King County," 2006, p.6.
[27] Delta Environmental Consultants, "Level III Environmental Site Assessment (ESA)," Dec. 2004, p. 21.
[28] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6.
[29] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.5.
[30] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, vi, 12
[31] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 13
[32] Delta Environmental Consultants, "Level III ESA," Dec. 2004, vi, vii
[33] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, 14
[34] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 7
[35] Delta Environmental Consultants, "Level II ESA," 2004, p. 9

recommended it be handled according to Ecology regulations.[37] In addition, a 1993 report stated that semi-volatile compounds were detected in the Sawmill/Powerhouse area; it is unknown if these last two items were addressed based on reviewed reports.[38]

(5) The Lumber Strapping Area had a hydraulic oil spill at this location, leading to DRO and heavy oil hydrocarbons testing above MTCA A CLs in soil and TPH in groundwater.[39] In 2006, 751 CY of soil were excavated and most subsequent soil samples tested below MTCA B CLs, though one location still exceeded the MTCA B CL. [40] Earlier tests also showed TPH-D and TPH-O (-Diesel & Oil) groundwater impacts;[41] it is unknown if these issues have been addressed.

(6) There were 2 PCP Dip Tank areas identified as potentially contaminated with PCP. While the PCP Dip Tank area 2 tested free of phenolic compounds,[42] Dip Tank area 1 contained PCP groundwater concentrations that exceeded the MTCA Method B CL; results indicate that groundwater impacts were localized near the former dip tank and have not migrated downgradient.[43] It is unknown whether PCP contamination in this area has been addressed.

In addition to the above, the following areas may need further redress: groundwater DRO/TPH at the former vehicle wash pad;[44] T-18 DRO/TPH surficial soil impacts;[45] investigation of roadway surface oils, mill ditch system sedimentation,[46] and sampling of log pond sediments.[47]

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[36] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. v
[37] Delta Environmental Consultants, "Level II ESA," 2004, p. 13
[38] Shannon & Wilson Inc., "Level I EA," 1993, p. 14, 15
[39] Delta Environmental Consultants, "Level III ESA," Dec 2004, p iv, vi, 17, Table 11. Reports on groundwater contamination appear to conflict within ESA III, but tabular data results confirm TPH results exceeding MTCA A CLs
[40] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6, 8.
[41] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area . July 19, 2005, p 3&4
[42] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p v, 19
[43] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area . July 19, 2005, p. 3
[44] Delta Environmental Consultants, "Level II ESA," 2004, p.11 & Delta et al, "Level III ESA," Dec. 2004 p iv-vii, 8, Table 13.
[45] Delta Environmental Consultants, "Level II ESA," 2004, p. iv, 7, 17
[46] Shannon & Wilson Inc., "Level I EA," 1993, p. 12, 13
[47] Shannon & Wilson Inc., "Level I EA," 1993, p. 12 & Dept of Ecology, "Snoqualmie Facility Class II Inspection, 2/9/93," 1994, 22

Letter No. 17

Re: Snoqualmie Mill PCI Plan Draft EIS

10-July 2020

To Whom It May Concern,

I volunteered to help review the DEIS as a participating member of the SCAN group. Although I am not familiar with the City of Snoqualmie's development plans, I do have serious concerns about approving a third "city" location (in addition to old/downtown Snoqualmie and Snoqualmie Ridge).

I am also an active member of a Sustainability Project Team, specifically focusing on Green House Gas emissions, in addition to my "day" job with Cytiva and the lack of attention to focusing on a net zero impact to the environment including building materials is somewhat disappointing. It is beyond time for all of us, as professional employees and citizens of neighborhoods, to start requiring a much harder restriction on those decisions we are responsible for making. If Snoqualmie truly is a "green" city, I would expect to see much more mention of this within the DEIS. There needs to be much more attention paid by the City of Snoqualmie to address the presence and build plans for the PCB's present, the boiler ash, and potential PCP contamination. I do not see sufficient plans to thoroughly address those contaminants and avoid spreading. 17-1

I volunteered to help read this document because I am extremely concerned as a resident who is down-river from this site, in Fall City. Continued development next to vulnerable resources such as the Snoqualmie River is extremely concerning and the risk for permanent damage seems too risky to allow. 17-2

If this are is truly an existing hazard to the natural areas at the Mill site, it seems that the City of Snoqualmie should attempt to take some ownership in the clean-up of this area, instead of waiting for a developer to own the costs/project without major oversight. Especially considering I have doubts in the thoroughness that will be required of a clean-up that hasn't been scoped, to date, as I mention multiple times below. 17-3

The lack of mention of public transportation is concerning. There is no mention of access to this area other than by car, and no thought to bus lines or bike access. You are putting more cars on 202, Snoqualmie Ridge Parkway, and subsequently the I-90/Hwy 18 interchange. The location of this new development is tucked far away from opportunities for public transportation and it will be only the most fit human beings who will be able to access this "tourist" area by foot or bike. 17-4

I understand that the water permits haven't even been approved for this project, and the permit is only structured to support Phase 1 of this project. There is no mention to the water rights permit or how the developer will source water rights for the other two Phases of the project. This is extremely concerning. 17-5

I have reviewed several sections of the DEIS, and offer my input (by section) below:

Introduction (pgs 1 – 10)

"When fully developed, the site could generate approximately 3,410 jobs. Much of the overall site (166 acres, 64%) would remain undeveloped and be maintained for open space, landscaping, wetlands and streams, wildlife habitat, and flood storage; 37% of the site would be developed with buildings and other impervious surfaces."

As this new "city" center becomes more popular, will the surrounding areas turn into urban growth areas as well such as what happened with the Issaquah Highlands and Snoqualmie Ridge? This area will be the gateway expansion approval to continued growth in an area that should be protected as part of our want to keep the Snoqualmie Valley more natural vs. urban sprawl. 17-6

1.0 Summary (pgs 23 –68)

PCI Master Plan Proposal

"Development of the site would occur in three general phases, over an approximate 10-to-15 -year period."

This is probably an optimistic projection of their project, so instead we are looking at 10 – 20+ years of continued construction for the area. Subsequently, additional construction will be required due to the road developments that are required to support the development of this "third" city center. 17-7

MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

"Increased vehicular traffic to and from the site;"

The amount of semi-truck/large hauling trucks that rolls through the Snoqualmie Ridge, up 202, and through downtown Snoqualmie is already appalling. The idea that we will now be approving construction traffic including the hauling away of hazardous waste related to the clean up during Phase 2 & 3 buildup as well as the waste from wine production on a life-time basis - through these neighborhoods/areas is disappointing.

What impacts does the EIS identify?

"Construction equipment and material hauling could affect traffic flow within the vicinity of the project site, especially if construction vehicles travel during peak periods or other heavy-traffic hours of the day and pass through congested areas."

This statement is severely downplayed. Construction traffic will absolutely affect traffic flow. Any addition of a large semi-truck to the area creates slowdowns along 202, and not just during congested hours. Also, the large hills you have to drive over to access are challenging for the majority of semi-trucks to make fast start/stops on. 17-8

Traffic Air Quality Impacts

"Future traffic volumes and delays would increase over existing conditions, but future CO concentrations are assumed to decline due to adoption of newer, more efficient vehicles and cleaner fuel regulations."

This company is taking zero responsibility for the impact to emissions with this statement. They are taking no active stance on how to limit or be conscious of the impact to the environment through emissions of increased traffic. 17-9

GHG and Sustainability

"Sustainable features would be incorporated into the project through compliance with requirements of Building and Energy Codes and the likely use of the green building technologies, which are described in proposed design guidelines (refer to Chapter 2)."

Force a higher bar for this new community, at the very least! If you are moving forward with this, make them a community that sets higher standards for themselves and attracts tenants that are also consciously minded towards sustainability. Make a stand as the City of Snoqualmie. 17-10

What impacts does the EIS identify?

"...post-construction site conditions would generate a greater amount of surface water runoff than existing conditions. The on-site wetland system serves as a natural drainage conveyance system to the Snoqualmie River and Borst Lake, so these wetlands would experience increased daily and monthly flows after development."

To simply allow additional run-off into a river and area that is already prone to flooding is concerning. 17-11

Water Quality

"...on-site treatment will reduce stormwater pollutants to levels that are not expected to impact local conditions in the Snoqualmie River or fish habitat conditions therein."

The City of Snoqualmie should require full elimination of pollutants. And using verbiage like "not expected to impact" does not give me very much confidence in their risk assessment of the impact. As a resident down-river from this proposed new City, I have concerns over the impact to our waterways. 17-12

Minimization of Impacts

"To the extent feasible, construction staging areas would be located outside of wetland and stream buffer;"

This should be a requirement. Not an "if feasible" attempt. The wetlands and stream protection should be the number one/sole priority if this construction is approved. 17-13

What are some solutions or mitigation for the impacts?

"The increases in population, housing, and employment associated with the PCI Plan are not considered significant impacts, and population and employment growth are not in themselves adverse impacts."

I disagree with this statement, in full. Considering the growth on the Snoqualmie Ridge, even a perceived "slight" increase in a third "City" would be significant. 17-14

Visual Character/Height, Bulk and Scale

"The proposal for Planning Area 1 includes building heights of up to 4-5 stories..."

This building height will completely destroy the natural skyline for this area. Both for those looking to enjoy the trails surrounding the area, those living/travelling along the Snoqualmie Ridge corridor and also be a new blemish for those looking to enjoy the natural beauty from hiking locations such as Mount Si. 17-15

What impacts does the EIS identify?

"...increased residents and employment in the area could influence an incremental increase in tourism to the area, including Snoqualmie Falls; this, in turn, which could indirectly cause increased vehicular traffic and noise at those locations."

Putting in another community, a light industrial area, and an outdoor amphitheater will absolutely increase vehicular traffic and noise. It's frustrating to see this continuous "downplaying" of impact throughout the document. Later in the document they mention "5,780 new Saturday daily trips" for planning area 1 alone. This is also not even including the expected new nightly traffic during summer months for the amphitheater which they are trying to advertise two nights/week. 17-16

Intersection Level of Service

"Under full buildout of the PCI Plan in 2032, the following intersections would fail to meet City LOS standards (LOS D) without improvements..."

The number of streets that they call out needing development, expansion, reconstruction, etc. most of which haven't been approved for planning is a big red flag. To allow this development to proceed without those plans in place is irresponsible. You are building before the area has the infrastructure to support the growth. 17-17

Incorporated Features of the Proposal

"The existing private Haul Road north of the site would be used to provide access for heavy trucks to service industrial and warehouse uses in Planning Area 2. The Haul Road may warrant widening in a few locations where it is less than 25 feet wide, to ensure adequate lane width for trucks. **However, the road is bounded by wetlands and a stream and their buffers; widening would likely intrude into the buffers and possibly the wetlands.** Given these environmental constraints, alternatives to widening should be examined. In addition, pedestrian and other frontage improvements should not be required given that the road is private and will primarily be used by truck traffic."

The City should be requiring them to provide other plans instead of possible infringement on the surrounding wetlands so the construction trucks can access the property. It is unacceptable to allow the surrounding environment take a back-seat to construction development, furthering my concerns around water and wetland contamination that will end up flowing down through the Snoqualmie Valley. 17-18

Other Potential Mitigation Measures

"Widening of SR 202 to provide one additional through lane in each direction at the Snoqualmie Parkway intersection; widening is planned as part of the City's 6-year TIP, but the project is not fully funded at this time."

Another unfunded road construction project that is integral to the safety of the surrounding area for this project to proceed. 17-19

What are some solutions or mitigation for the impacts?

"Noise may be audible at residential locations during some elements of construction and operation of the proposed project and alternatives. However, neither construction nor operation of the facility is expected to result in significant noise impacts, and no mitigation measures are warranted."

How can an amphitheater not be considered a significant noise impact? We live in a valley, it will be heard for miles throughout Snoqualmie and North Bend. A mitigation should be required or the amphitheater should be stricken from the project plans. 17-20

Utilities

Water

"The City's water system currently has capacity to support the demands anticipated for Planning Area 1."

I understand that the water permits haven't even been approved for this project, and the permit is only structured to support Phase 1 of this project. There is no mention to the water rights permit or how the developer will source water rights for the other two Phases of the project. This is extremely concerning. 17-21

Incorporated Features of Proposal

"Work within existing functional wetland or stream buffer boundaries would be limited to the dry season (avoiding November through February) where feasible."

This statement seems incorrect: Our dry season is not March through October. More realistically, it's probably May through September. 17-22

"...not necessarily adverse, provided that water supply is sufficient to support it, that required facilities to convey and treat water and wastewater are adequate, and that drainage facilities protect water quality."

I do not believe this is true considering they are wanting to make wine at the location. The demand on our water sources for the entire process of wine making, the cleaning/sterilization process seems quite high. 17-23

2.0 Proposal and Alternatives (pgs 69 – 108)

Removal of the Weyerhaeuser Log Sort Yard Berm

"All of these actions were unsuccessful; King County had concluded that pursuit of a code enforcement action against Weyerhaeuser for removal of the berm and fill from the Mill site was not warranted, and that there was insufficient cause to reopen the County's earlier determinations to not undertake code enforcement action. In 2006, the berm was breached and some of the fill was removed."

It's disappointing that the city of Snoqualmie hasn't decided to address this regardless of the lawsuit outcome with Weyerhaeuser - it seems the city should want to do this for it's citizens and the environment it is responsible for. 17-24

Comprehensive Plan Annexation Policies

"...including a review and update, if necessary, of adopted utility sewer, water, and storm drainage plans."

This should be absolutely required as a part of this development project, as required by the City of Snoqualmie. 17-25

"the Pre-Annexation Agreement stated specifically that no development could occur on the Snoqualmie Mill site until an AIP was approved by the City, a PCI plan was submitted and approved, and SEPA review was conducted."

This has already been violated considering they have already done development work! The city has retro-actively gone against this requirement and I'm concerned that approvals will continue to turn a "blind eye" to commitments that were made historically. It feels like the trust between residents of this Valley and the City's approval process has already been broken. 17-26

Objectives of the Proposal

"Provide residential uses proximate to jobs to enable residents to work close to home and improve the balance between work and quality of life."

Based on the anticipated types of businesses in this new "city", they will not be able to afford to work and live in this area. A one bedroom apartment, with an average of 835sq feet will require an income of $50-60k. Considering the majority of the businesses in this area will be minimum-wage paying jobs, they will not be able to afford these rentals on a 28k income. Therefore, you have people living in this area, who will be commuting into and out of the area every day, as well as the traffic from those people working at these minimum wage jobs coming into and out of the new area every day. 17-27

On top of this, there continues to be a messaging of increased tourism to the area. If the people who live there are encouraged to never leave because they have everything they need, then what will the rest of Snoqualmie have to offer?

Land Use

"An indoor event space for weddings, parties, and corporate retreats would be integrated into the mixed-use portion of Planning Area 1. An average of one event per week is assumed, generally on weekends."

Again, how can something that is expected to bring in this many extra people to the area not have a significant impact on our resources such as police, fire, water, sewer and also increase noise, traffic, light pollution, etc. 17-28

Building Types and Design – Design Guidelines

"Individual parcels within the property will be sold to developers who will design individual buildings."

The City of Snoqualmie should require any interested parties to build with 100% sustainability in mind. There should be a net zero impact. 17-29

Roads and Trails

"The haul road is bounded by wetlands and streams and would be difficult to widen or improve without affecting critical areas."

Another mention of the fact that currently, they have no way to access this site for development without impacting sensitive areas. The City of Snoqualmie should be requiring a mitigation plan, fully scoped to avoid this. 17-30

"Replacement and expansion of the existing SR-202 bridge crossing the Snoqualmie River is included in the City of Snoqualmie Transportation Improvement Plan (for 2019-2024). The project is not included in WSDOT's current Capital Improvement Plan, however, and is not funded at this time. The existing bridge has sufficient capacity to support proposed development of Planning Area 1 (see Section 3.11 of the Draft EIS); however, a new bridge would be necessary to support traffic associated with full buildout of the Snoqualmie Mill PCI Plan. Planning, design and funding for a new bridge would require a cooperative effort among the City, WSDOT and the applicant; additional environmental review would also need to occur. The timing of this improvement is uncertain at this point."

Another necessary but unfunded road project. I am extremely concerned that an approval for Phase 1 will automatically set us on a trajectory for approval of Phase 2 and 3 at any cost, and the residents of Snoqualmie will have to take on the burden and pain of the expansion of this bridge. 17-31

Sustainability

"• Preserve almost two-thirds of the site as open space;

• Avoid direct impacts to wetlands and streams and restore and enhance wetland buffers;

• Balance cuts and fills on-site and avoid any increase in flooding;

• Establish a goal of LEED gold or platinum certification to achieve energy efficiency (to be included in the design guidelines, discussed previously);

• Provide a substantial number of jobs and a mix of commercial and residential uses in mixed use buildings along a pedestrian-oriented main street;

• Be proximate to housing; and

• Generate significant new revenues to the city."

This section is a sad attempt to define or envision what sustainability actually is, and the city should be taking a much harder stance on sustainable efforts. This type of investment will see outcomes in future years and your residents (both current and new) will have a respect for your planning and thoughtfulness that is being regularly demanded of responsible parties. 17-32

Land Use Concept

"The PCI Plan's land use objective for Planning Area 1 is to develop a complimentary mix of commercial, industrial, retail, and residential uses along a pedestrian-oriented main street, within a larger planned development. The main street would be oriented towards Mt. Si and encompass views of the historic Planer Building and surrounding open space."

This development continues to be pitched as a center that would increase tourism for the entire valley, which I disagree with. The likelihood of someone wanting to dine in downtown Snoqualmie, then get back in their car to see an outdoor concert in an area that already has dining options is ridiculous. People will only come to this new "city center" and will not be spending their money in places such as downtown that sorely needs more income from tourism. 17-33

Winemaking Operations

"Grapes would be transported to the site by truck for subsequent processing."

This equals more, long term semi-truck traffic for the area.

The entire process creates waste that is much higher than a standard restaurant, bar or residence. It also includes cleaning processes that uses chemicals that has to be stored and then disposed of, at some point. 17-34

3.5 Environmental Health (pgs 244-260)

Environmental Assessment

"It also identifies nearby visually apparent sensitive receptors, including surface water (the Snoqualmie River and Borst Lake) and designated wetlands. The Snoqualmie Mill Property location within the floodplain is noted. No public water supply wells were identified proximate to Planning Area 1."

The impact to those "sensitive receptors" must be taken into account when making this decision. The area should be protected by the City of Snoqualmie, and not trivialized to create a third economy that will compete with Downtown and The Ridge. 17-35

Areas of Known or Suspected Contamination

"As documented in the following subsection of the EIS, there are known and suspected areas of contamination in Planning Areas 2 and 3."

There needs to be a seriously developed plan to address this contamination before they start building Area 1. And continuing to say this will be addressed congruently with the development of Phase 2 & 3 sounds very much like they will make every attempt to skirt those requirements. Considering the City's track record of post-approval of permitting, I am extremely concerned blind-eyes will be turned away from the necessary need for this are. Also, this does not touch on the impact to those who will be living in Phase 1 – will they be made aware of the contamination and future development? If there was an accident during clean-up or a post build accident, those residents would be at risk. 17-36

Environmental Assessment

"Between approximately 1989 and 2006, Weyerhaeuser... the cleanup actions did not achieve MTCA cleanup standards for all areas of known contamination, and contamination remains or is suspected to remain at concentrations exceeding current MTCA cleanup levels in some of the areas where the cleanup actions were performed."

I simply cannot believe that the City is not requiring a full cleanup or at least fully scoped cleanup before approving any building at this site. I can only imagine the cost of this endeavor, which again will lead to cutting corners and asking for forgiveness instead of permission. 17-37

Areas of Known or Suspected Contamination

There is one area of known contamination and one area of suspected contamination in Planning Area 2. The majority of the areas of known or suspected contamination are in Planning Area 3 because the majority of the former mill operations occurred there...temporary fencing has been installed..." 17-38

Is this going to be the long-term solution to keep the new residents and tourists out of this area? I'd expect to see a stronger mitigation plan to keeping this "contaminated" area more separated from the public.

"...prior to redevelopment in Planning Areas 2 and 3, additional remedial actions would need to be conducted in each area of known or suspected contamination to characterize the nature and extent of contamination, identify and evaluate cleanup alternatives, and select a cleanup action." 17-39

This is concerning that a cleanup is not required prior to any building at the Mill Site or at least a fully scoped estimate for the cleanup with more concrete commitment by the Developers.

Impacts of Proposal

"PCI Plan approval would not authorize any physical redevelopment. Although types and amounts of planned land uses are identified for Planning Areas 2 and 3, and evaluated in the EIS at a general level, additional planning, engineering and permitting are required before redevelopment could be approved for these portions of the Snoqualmie Mill Property."

"...an environmental investigation would need to be conducted to characterize the nature and extent of the contamination, cleanup alternatives would need to be identified and evaluated, and a cleanup action that was consistent with MTCA and protective of human health and the environment would need to be selected."

As I've already stated, the amount of work this cleanup requires sounds extremely large. I cannot anticipate a company realizing that until a fully scoped project of work is determined. Allowing them to do this "congruently" with the development of the other two Phases sounds like we are giving them reason not to follow through on the commitment to clean this area up and make it "better" as they continue to state throughout the document. 17-40

Risk of Accidental Releases, Fire or Explosion from Future Industrial Uses

"wine-making process... However, some cleaning products are caustic and are categorized as hazardous and, if not contained, pose a risk to the environment."

The idea of putting a wine making facility that close to the river is very concerning. The process of making wine, sterilization of the equipment and barrels, and the risk to any of the surrounding waterways/wetlands is too risky. 17-41

Construction Impacts

"Construction activities could potentially disturb contaminated areas and cause release or exposure to contaminants in soil."

As stated earlier in the document, to build Phase 1 of this document, they have not even addressed the need to widen a road that impacts wetlands on the north side of the property. That in itself should indicate that this project should NOT be approved.

17-42

"Planning Area 1 is not affected by legacy contamination, and construction would not pose a risk of release or exposure."

The two above quotes are in the same paragraph, and seem to contradict each other. There is a potential with construction occurring, yet the next statement says there is no risk. If there is potential, there is risk.

Mitigation Measures

"There is some degree of risk of a potential release associated with storage and use of hazardous materials that are used for the cleaning and sanitation of wine-making equipment."

The magnitude of the impact to wine tasting on our water and waste facilities seems to be very understated. In the more general sections referencing water and waste, there is no mention of the wine making.

17-43

"The risk of spills, fire, and explosion related to vehicle accidents would be mitigated by road improvements and traffic controls discussed in Section 3.11 – Transportation."

As stated earlier in the document, none of the road improvements or expansions have been approved, therefore this risk is completely unmitigated.

17-44

3.6 Land and Shoreline Use (pgs 262-275)

Impacts of Proposal

"The proposal would redevelop the site from an obsolete and dormant heavy industrial brownfield property into a mixed-use employment center."

This is an over-exaggeration of the full PCI benefit from my perspective, considering the brownfield portion is located in Planning Area's 2 & 3, which have not been approved within this DEIS.

17-45

Compatibility with Adjacent Uses

"Future development would be proximate to and visible from the future Snoqualmie Valley Trail to the east. From this perspective, the master plan would appear as a relatively intensive development in a rural environment;"

The visibility on the river will be much larger than just from the SVT, especially with buildings at the proposed heights. In fact, this will most likely be visible in every direction, especially coming from the Ridge and it will effect the natural skyline dramatically.

17-46

Change in Intensity, Character, and Activity

"There would be greater customer and tourist visitors attending the outdoor performance space. Weekend and evening use would be seasonally higher with such a use than under the Proposal."
This proposed outdoor space, which again still is not approved, will have a huge impact on our traffic and noise. I would even guess that you would be able to hear something of this size across the valley, potentially from the top of Mount Si. It seems they downplay the impact of something like this, which is frustrating as a resident of this valley.

17-47

Other Responsibilities and Requirements

"Shoreline Management Act... submitted to the Department of Ecology for review; agency comments have not been received as of this writing and will be addressed in the Final EIS, as appropriate."

It is concerning that we are approving anything prior to this being approved by the Dept of Ecology. The shoreline and surrounding wetlands should be the top priority, and this document consistently downplays some of those impacts.

17-48

Letter No.18

Mark Hofman

From: Nancy Thomas <thomashn@comcast.net>
Sent: Monday, April 27, 2020 5:46 PM
To: Mark Hofman
Subject: Mill Site

Categories: Green category

RECEIVED
APR 27 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Hofman,

I writing regarding the development of the Mill Site and my concerns as a neighbor.

I am very concerned about the proposed outdoor music venue with a capacity of 5000 people that would operate 2 times per week from April - September. Although we live a few miles from the site, and from downtown Snoqualmie, the noise from bands during Snoqualmie's annual railroad days actually travels to our home and is surprisingly loud. This is a very peaceful and rural area where the quiet is valued by the residents and visitors to the Three Forks Park natural area. Noise in the valley travels easily and seems to bounce of the rock face of Mount Si. Please do NOT allow this piece of the development to go through. We all live for the days we can be outside here in the Valley and to be subjected to loud concert music in unconscionable. 18-1

In addition, the traffic that would be generated from such a venue would make the one lane bridge over the Snoqualmie backed up for miles and create a hazard for many in the neighborhood who may have to exit the area for an emergency. The roundabout near the site is known to already come to a standstill on busy weekends with visitors to Snoqualmie Falls. The addition of concert goers cars only points to complete gridlock. 18-2

As a whole, I think that this site is not suited to this scale of development due to the ingress and egress issues. The I-90 interchange is a continual issue that would be made even worse with this scale of development. Clearly many traffic studies were done, but they're difficult to interpret. A lay person can tell you where the pinch points are already and to add such a huge scale of new cars to the road will turn our beautiful area into a gridlocked mess.

Thank you for your consideration of my concerns.

Sincerely,

Nancy Thomas
43406 SE 88th ST
North Bend, WA 98045

Letter No. 19

Mark Hofman

From: Dave Eiffert <daveeiffert@gmail.com>
Sent: Wednesday, April 29, 2020 3:26 PM
To: Mark Hofman
Subject: Mill Plan DEIS

Categories: Green category

RECEIVED
APR 29 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hello Mark. I hope is all well with you.

I received notice of the DEIS for the Mill, and because I have interest in it, went on line to see what it said. There are a couple of items i have questions about, and would appreciate clarification.

In the Master Drainage Plan, Figures 2-2 and 2-3, listed as the Active Landscape Open Space (including Public Assembly Areas) in light green toward the center of the drawing is clearly the amphitheater. On page 2-34, it is stated that "The outdoor performance space would be eliminated in this alternative at the request of the applicant", though on page 2-35 the space is clearly listed. It states there will be a 3.7 acre grassy area with a 2,000 square foot stage, accommodating 5,000 attendees at concerts to be held twice per week from June through September. On the same page, under 3., there is a "no action alternative'. It is unclear to me whether the EIS is being submitted for approval based on the intention to build the outdoor performance space or not. Can you clarify that for me? 19-1

Water demand has increased to 799 ERU from an earlier plan estimate of 699 ERU. It seems from what I read that all water supplies for the project will come from the city supply, but figure 4-6 shows 4 wells. Are they just listed for documentation's sake, or does the plan include pumping water from them? 19-2

Thank you!

--
Dave Eiffert
425-894-7970

Letter No. 20

Mark Hofman

From: Natalie Williams <natalieibclc@gmail.com>
Sent: Wednesday, April 29, 2020 9:11 PM
To: Mark Hofman
Subject: Millpond development

Categories: Green category

RECEIVED
APR 29 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

For Open Comment Period:
I think anything develped at the Millpond Road should be natural and not block any views. The Snoqualmie Tribe should be consulted and permission/input taken into consideration with design and preserving natural spaces. This will be very sad. I really enjoy the backroads and having natural areas. 20-1
Please be very careful. Once destroyed and sold for profit, we can never get this natural space back.
Sincerely,
Natalie Williams

Letter No. 21

Mark Hofman

From: Dave Eiffert <daveeiffert@gmail.com>
Sent: Thursday, April 30, 2020 7:58 AM
To: Shared Mill Site EIS
Subject: Snoqualmie Mill DEIS

Categories: Green category

RECEIVED
APR 30 2020
City of Snoqualmie
Community Development Department

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I have a severe concern about the Snoqualmie Mill DEIS, namely the proposed Public Assembly Areas, AKA amphitheater. Otherwise, I am supportive of Snoqualmie Mill Ventures' efforts to restore the site to a source of local jobs, tourism and revenue.

In the Master Drainage Plan, Figures 2-2 and 2-3, listed as the Active Landscape Open Space (including Public Assembly Areas) in light green toward the center of the drawing is clearly the amphitheater. On page 2-34, it is stated that "The outdoor performance space would be eliminated in this alternative at the request of the applicant", though on page 2-35 the space is clearly listed. It states there will be a 3.7 acre grassy area with a 2,000 square foot stage, accommodating 5,000 attendees at concerts to be held twice per week from June through September. On the same page, under 3., there is a "no action alternative'. It is unclear to me whether the DEIS is being submitted for approval based on the intention to build the outdoor performance space or not. The verbiage is self-conflicting and ambiguous. Is the amphitheater to be built or not? Does the language indicating that it is allowed remain from earlier presentations because no one thought to remove it, or to allow it to squeak through uncontested?

During the last round of presentations and input opportunities, mid-year 2017, it was very clear from public input that valley citizens did not want the amphitheater to be allowed as a part of the development. The council chambers were packed by citizens not wanting it. Even Tom Sroufe expressed surprise at the strength of the sentiments. The reasons given were numerous: Traffic, danger from concert attendees leaving concerts intoxicated, and noise, which is my chief concern. I already have to tolerate the over-amplified outdoor concerts held at the Snoqualmie Casino, and the Mill is much closer to my home, which is just over a mile from the potential amphitheater per the DEIS maps. 21-1

I can hear the Casino concerts inside my home with the windows shut, often over the television. The amphitheater would be the same, only closer. The orientation would have the speakers projecting the sound down Reinig Rd, right into my neighborhood. I feel it would be unconscionable to allow another source of over-amped music to further degrade our community so that Snoqualmie Mill Ventures, LLC can make a few extra bucks. When I should be able to enjoy some of our all-too-few warm summer evenings, I am assaulted in my own yard by music I don't like. Our community's base attractiveness is rooted in small town life in a bucolic setting, and to allow an amphitheater would demonstrate all the civic pride of cities like Fife and Puyallup.

Don't let it happen. Remove the language allowing the amphitheater from the DEIS.

--
Dave Eiffert
425-894-7970

Letter No. 22

Mark Hofman

From: Lisa Ozaeta <lhozaeta@gmail.com>
Sent: Thursday, April 30, 2020 8:33 AM
To: Shared Mill Site EIS
Subject: Mill Site Development Concern

Categories: Green category

RECEIVED
APR 30 2020
City of Snoqualmie
Community Development Department

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Good Morning,

I wanted to send a quick email to register my concern about the Snoqualmie Mill DEIS published yesterday. I live off of Reinig Road. I support this development with the exception of the Amphitheater. We purchased our home in the "Country" so that we could have a quiet place. The amphitheater will cause excessive noise in our neighborhood. My understanding was that this development would not include the amphitheater. I am surprised that it was included in this plan. 22-1

I am sure you are getting a lot of feedback. I am happy to attend any city council meeting to discuss my concerns further.

Thank you for your work.

Lisa Ozaeta
Indian Hill

Letter No. 23

Mark Hofman

From: Helene Baradat <helene.baradat@gmail.com>
Sent: Thursday, April 30, 2020 9:06 AM
To: Shared Mill Site EIS
Subject: Snoqualmie Mill DEIS

Categories: Green category

RECEIVED
APR 30 2020
City of Snoqualmie
Community Development Department

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I have a severe concern about the Snoqualmie Mill DEIS, namely the proposed Public Assembly Areas, AKA amphitheater. Otherwise, I am supportive of Snoqualmie Mill Ventures' efforts to restore the site to a source of local jobs, tourism and revenue.

In the Master Drainage Plan, Figures 2-2 and 2-3, listed as the Active Landscape Open Space (including Public Assembly Areas) in light green toward the center of the drawing is clearly the amphitheater. On page 2-34, it is stated that "The outdoor performance space would be eliminated in this alternative at the request of the applicant", though on page 2-35 the space is clearly listed. It states there will be a 3.7 acre grassy area with a 2,000 square foot stage, accommodating 5,000 attendees at concerts to be held twice per week from June through September. On the same page, under 3., there is a "no action alternative'. It is unclear to me whether the DEIS is being submitted for approval based on the intention to build the outdoor performance space or not. The verbiage is self-conflicting and ambiguous. Is the amphitheater to be built or not? Does the language indicating that it is allowed remain from earlier presentations because no one thought to remove it, or to allow it to squeak through uncontested? 23-1

During the last round of presentations and input opportunities, mid-year 2017, it was very clear from public input that valley citizens did not want the amphitheater to be allowed as a part of the development. The council chambers were packed by citizens not wanting it. Even Tom Sroufe expressed surprise at the strength of the sentiments. The reasons given were numerous: Traffic, danger from concert attendees leaving concerts intoxicated, and noise, which is my chief concern. I already have to tolerate the over-amplified outdoor concerts held at the Snoqualmie Casino, and the Mill is much closer to my home, which is just over a mile from the potential amphitheater per the DEIS maps.

I can hear the Casino concerts inside my home with the windows shut, often over the television. The amphitheater would be the same, only closer. The orientation would have the speakers projecting the sound down Reinig Rd, right into my neighborhood. I feel it would be unconscionable to allow another source of over-amped music to further degrade our community so that Snoqualmie Mill Ventures, LLC can make a few extra bucks. When I should be able to enjoy some of our all-too-few warm summer evenings, I am assaulted in my own yard by music I don't like. Our community's base attractiveness is rooted in small town life in a bucolic setting, and to allow an amphitheater would demonstrate all the civic pride of cities like Fife and Puyallup.

Don't let it happen. Remove the language allowing the amphitheater from the DEIS.

Helene Baradat.

Letter No. 24

Mark Hofman

From: Maria Cristina Berg <grininnow@gmail.com>
Sent: Thursday, April 30, 2020 9:55 AM
To: Shared Mill Site EIS
Subject: Mill site development

Categories: Green category

RECEIVED
APR 30 2020
City of Snoqualmie
Community Development Department

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To whom this may concern,

I live on Indian Hill near this development. I am excited to see the progress although I must say I'm VERY concerned about the amphitheater. We here on the hill are already disturbed my the casino concerts that are very load and hear clearly. Twice a week concerts would ruin our peace and quiet in the summer. 24-1

I thought this had already been rectified to not happen. Please explain further.

Thank you for your time on this matter.

Maria Cristina Berg
425-306-3073

Letter No. 25

Mark Hofman

From: Rob McCann <rmccann77@hotmail.com>
Sent: Thursday, April 30, 2020 3:54 PM
To: Gwyn Berry; Mark Hofman; Jason Rogers; Bob Jeans; Katherine Ross; Bryan Holloway; James Mayhew; Matthew Laase; Sean Sundwall; Peggy Shepard; Matt Larson; Shared Mill Site EIS
Cc: ashleigh-mccann@hotmail.com
Subject: no amphitheater [RE: Mill Site Notice of Availability]

Categories: Green category

RECEIVED
APR 30 2020
City of Snoqualmie
Community Development Department

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Hello Gwyn, Mark, Jason, the Snoqualmie City Council, and Mayor Larson,

We're writing to reiterate our displeasure at the idea of an outdoor amphitheater on The Mill Site. Us and the residents of Snoqualmie voiced this loud and clear in 2017, and those sentiments haven't changed. Here's our previous, respectfully-short feedback as a reminder.

> *On May 24, 2017, at 10:23 AM, Rob McCann <rmccann77@hotmail.com> wrote:*
>
> *Hello City of Snoqualmie,*
>
> *We're writing to express our distaste for the proposed amphitheater at the old Weyerhauser mill. We understand the desire to leverage that site for economic growth, and we have no qualms with the existing development proposals – other than the amphitheater. I'm sure you're all aware of what a large outdoor summer concert venue would bring to the city...and in our minds the negatives far outweigh the positives. The residents of this valley live here because of our natural treasures...that is what we have and what defines us. Filling our streets with very large numbers of intoxicated concert goers, and noise-polluting our few nice summer evenings is...well, a short-sighted way to make a buck.* 25-1
>
> *So far we've been lucky enough to keep most of this activity near the Casino, and I hope we can continue that arrangement. It's the tranquil outskirts that make our area special, and we should defend those no matter what. Please consider this feedback as you move forward.*
>
> *Thanks.*
>
> *-Rob & Ashleigh McCann*
> *Residents of Indian Hill, Snoqualmie, WA*
> *Proud parents of 3 very active Valley children*

I'm concerned about the email below from Gwyn Berry. Please provide clarity on where we're at now. **Is an amphitheater currently under consideration?** Pages 1-2 & 2-11 of the recently released DEIS suggests the answer is no ("outdoor performance venue is no longer part of the proposal"), but there are numerous other mentions/depictions of the amphitheater in the same document (e.g., Pages 1-6/17/22/30, Exhibit 1.4-2, Pages 2-31/37, Exhibit 2.3-12, ..., Page 3-423). Most of them are listed as alternatives, but the amphitheater is so prevalent in the document that it appears fundamental to the proposal. To add insult to injury, the downsides also come across as either understated (e.g., "could

introduce additional noise and light disturbance" on Page 1-17), ignored (e.g., "not including any trips associated with special events at the outdoor performance space" on Page 1-30), or even mocked ("concerts could alter the quiet" :/, Page 3-163). Please foster transparency on our plans for The Mill Site so that all citizens can provide you with informed feedback.

We really, really hope Snoqualmie can find a way to ease its budgeting challenges without sacrificing our quality of life. Our feedback...absolutely no to an amphitheater smack dab in the middle of what little tranquility we have left. Once that's gone, we'll just be another eastside city. Actually, we'd be worse...with 5,000 concert goers partying up & down the parkway every Tuesday and Thursday summer night...and no quiet sides left in our piece of the Valley.

-Rob & Ashleigh McCann
Residents of Indian Hill, Snoqualmie, WA
Proud parents of 4 very active Valley children

From: Gwyn Berry <GBerry@snoqualmiewa.gov>
Sent: Monday, April 27, 2020 2:58 PM
Subject: Mill Site Notice of Availability

Please find attached the notice of availability of the Mill Site Draft Environmental Impact Statement. The notice contains the website address for review of the notice.
Best,

Gwyn Berry
Planning Technician
PO Box 987
Snoqualmie, WA 98065

Phone 425-888-5337 ext. 1131 | Fax 425-831-6041
www.ci.snoqualmie.wa.us

Letter No. 26

Mark Hofman

From: Sharilyn Lux <luxlanguages@gmail.com>
Sent: Friday, May 01, 2020 7:45 AM
To: Peggy Shepard; Mark Hofman; Bob Sterbank; Bob Sterbank; Matt Larson; Matt Larson; Council Members; Council Members
Subject: Re: Fw: Procedure Question for Mill Site
Categories: Green category

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MAY - 1 2020
City of Snoqualmie
Community Development Department

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Thank you Peggy! This is such a precious piece ofand, that info is vital. Thanks for holding our city accountable for a possible grave site of hundreds of families.

It is time Larson and the rest of council demonstrate some respect for other humans over the almight green back and a few developers. 26-1

Sharilyn

On Wed, Apr 29, 2020, 5:06 PM Peggy Shepard <PShepard@snoqualmiewa.gov> wrote:

From: Peggy Shepard
Sent: Wednesday, April 29, 2020 5:00 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>; Bob Sterbank <BSterbank@snoqualmiewa.gov>
Cc: Council Members <CouncilMembers@snoqualmiewa.gov>; Matt Larson <MLarson@snoqualmiewa.gov>
Subject: Procedure Question for Mill Site

Mark,

At the last city council meeting I asked what the process or procedure would be if someone wanted to appeal the DEIS. You said that you would put something on the website - if you have posted something, can you give me a specific URL? 26-2

We should be able to get an outline of the process without having to go into executive session.

Thanks,
Peggy

Letter No. 27

Mark Hofman

From: Li Hsi <ngfy90t@yahoo.com>
Sent: Saturday, May 02, 2020 9:13 PM
To: Shared Mill Site EIS
Subject: DEIS Snoqualmie Mill

Categories: Green category

RECEIVED
MAY - 2 2020
City of Snoqualmie
Community Development Department

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Dear Sir,

This email is to voice my strong opposition to the proposed Amphitheater or public assembly area. We want and we need the tranquility in this neighborhood especially during the summer time and/or weekend when most family members are at home. 27-1

The Casino already produces loud music toward us in summer, this proposed Amphitheater will be much, much closer to our home. Please be considerate The negative impact to our life in Snoqualmie Valley.

Sincerely,

Li Hsi
address: 40404 SE 70th Dr, Snoqualmie

Sent from my iPhone

Letter No. 28

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Sunday, May 10, 2020 3:57 PM
To: Matt Larson; Mark Hofman
Cc: editor@valleyrecord.com; info@livingsnoqualmie.com
Subject: Please delay the Mill Site Draft EIS public review until after the shutdown

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Categories: Green category

RECEIVED
MAY 10 2020
City of Snoqualmie
Community Development Departme

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To: Matt Larson, Snoqualmie Mayor
Mark Hofman, Snoqualmie Community Development Director / SEPA Responsible Official

CC: Snoqualmie Valley Record
Living Snoqualmie

From: Richard Scheel

Date: 5/10/2020

Dear Mr. Larsen and Mr. Hofman,

I respectfully request that the city retract the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan, published by the city on April 27. I ask that the city wait to publish the document and start the public review period until after the current restrictions on gatherings are lifted.

The DEIS is a very large, complex document. It contains 2,921 pages, and took the developer, the city, and numerous consultants over three years to create. A DEIS as complex as this deserves careful review by all affected parties. The size and complexity make it extremely difficult for any one individual to review, so this is best accomplished by dividing the work among multiple people. However, the restrictions on gatherings do not allow an effective group effort. 28-1

The people of our city will be served best by delaying the review period. The original estimate to create the DEIS by the developer and the city was one year, and instead it took three years. Certainly allowing a few more months before starting the clock on reviewing the document seems appropriate given the limitations imposed by the COVID-19 state of emergency.

Sincerely,
Richard Scheel

Letter No. 29

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com> on behalf of Dick Scheel <richard@rkscheel.net>
Sent: Monday, May 11, 2020 8:52 PM
To: Mark Hofman
Subject: Request for Mill Site DEIS public hearing
Categories: Green category

RECEIVED
MAY 11 2020
City of Snoqualmie
Community Development Department

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To: Mark Hofman, SEPA Responsible Official

Per WAC 197-11-535, I request that the city hold a public hearing for the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. I am a resident of the city, at 6701 W Crest View Loop SE, Snoqualmie WA 98065.

I understand that there is a meeting scheduled for May 20 for oral comments. I specifically request that there be a public hearing, and not just a "meeting". My concern is that if this is not designated as a public hearing, then the oral comment provided may not have the same legal standing as part of the official record.

29-1

I request that this be an in-person public hearing, due to the multiple times that problems have occurred with people trying to speak at some of the city's online meetings. This is a very significant project, with major effects on the residents of the city and the surrounding area. We should not risk denying some members of the public their right to speak at the hearing.

I also understand that an in-person meeting is not currently possible under the Governor's emergency proclamations. I feel that the importance of this hearing is such that it should be held after the restriction on large gatherings is no longer in effect.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065
Phone: 925-786-0078

Letter No. 30

Mark Hofman

From: Dave Eiffert <daveeiffert@gmail.com>
Sent: Tuesday, May 12, 2020 6:25 AM
To: Mark Hofman
Cc: Dick Scheel
Subject: May 20th online meeting

Categories: Green category

RECEIVED
MAY 12 2020
City of Snoqualmie
Community Development Department

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Good morning, Mark.

I am emailing you this morning in reference to the "remote online meeting" for people who want to provide oral comments on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. It is not clear to me whether this is this is a "public hearing" on the subject, and I feel it should be per WAC 197-11-535, to ensure that all received comments become a part of the record, including mine. 30-1

Although I am not a Snoqualmie resident, my house it approximately 1.2 miles from the planned development, and the potential amphitheater will be an aural nuisance, spilling into my property. 30-2

Thank you.

--
David Eiffert
6819 409th Ave SE
Snoqualmie, WA 98065
425-894-7970

Letter No. 31

Mark Hofman

From: cristie coffing <imouttolunch@hotmail.com>
Sent: Tuesday, May 12, 2020 6:59 PM
To: Mark Hofman
Subject: DEIS request

Categories: Green category

RECEIVED
MAY 12 2020
City of Snoqualmie
Community Development Department

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Mr. Hoffman,

I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. It is necessary to have a public hearing in a manner where all citizens can be physically present and heard. This hearing should take place when it is possible to have group gatherings. This is a crucial project, the restriction of an online meeting and the chance of limited online access to the online meeting, as has been the issue in past meetings, will restrict the citizens and concerned parties to speak and be heard. All parties should have the chance to be heard. 31-1

I qualify to make this request, as I am a citizen of the City of Snoqualmie. According to "WAC 197-11-535" a public hearing is required if fifty or more concerned and impacted citizens make a request.

Thank you for your time and consideration,
Cristie Coffing
8054 Maple Ave SE
Snoqualmie Wa 98065

Letter No. 32

Mark Hofman

From: Julie Lake <juliehlake@gmail.com>
Sent: Tuesday, May 12, 2020 8:03 PM
To: Mark Hofman
Subject: Public Hearing Request

Categories: Green category

RECEIVED
MAY 12 2020
City of Snoqualmie
Community Development Department

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Mark,

I am writing to request a Public Hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. Per WAC 197-11-535, a Public Hearing is required if fifty or more concerned and/or affected citizens request it.

An actual in-person Public Hearing is needed, at which all citizens and everyone else who will b affected may be physically present, heard, and their concerns be taken seriously. In other words, it's imperative that this Public Hearing hearing be held at a time when group gatherings are once again allowed. A virtual meeting for "Oral Comment" is insufficient. 32-1

This proposal is too important to risk the vagaries of an online meeting, with the possibility of limited or interrupted access, which have been a problem with past online meetings.

It is crucial that every stakeholder be given the unrestricted, in-person opportunity to be heard.

I am a citizen of the City of Snoqualmie.

Regards,

~Julie Lake

--
Julie H. Lake
38811 SE River St.
PO Box 1748
Snoqualmie, WA
98065-1748
303-819-0096

Letter No.33

Mark Hofman

From: monica lowney <monicalowney14@yahoo.com>
Sent: Wednesday, May 13, 2020 12:01 AM
To: Mark Hofman; Mark Hofman
Cc: Monica Lowney

Subject: Request for an in person public hearing on the Draft Environmental Impact Statement for proposed Snoqualmie Mill Planned Commercial/Industrial Plan

RECEIVED
MAY 13 2020
City of Snoqualmie
Community Development Department

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mark Hoffman (SEPA Rep),

I am writing to request a public hearing be held on the Draft Environmental Impact Statement (DEIS) for the proposed Mill Planned Commercial/Industrial Development. I understand the city plans to hold a single online comment period, yet not hold an in person public hearing. I received a letter from the City of Snoqualmie claiming that due to COVID a public hearing cannot be held. 33-1

Yet, I have also been advised that under our Governors proclamation, due to the COVID stay home order, cities should not be conducting business unless it is considered emergency or essential business. The Draft Environmental Impact Statement does not fall under this category, and citizens would like a public hearing to express their concerns with the DEIS. This is a significant project and citizens are entitled to their opportunity to speak in person during a public hearing. A zoom meeting is simply not adequate and many citizens in our community do not have the technical skill or ability to participate in such a meeting. I believe WAC 197-11535 explains the guidelines quite clearly when enough citizens request a public hearing. 33-2

As a resident of the city of Snoqualmie I would like the opportunity to speak and hear what my fellow citizens have to say regarding concerns pertaining to the DEIS for the planned Mill Commercial/Industrial development. I am requesting a follow up email as well as written notices be mailed to all citizens with the planned date, time and location of the future public hearing after the COVID stay at home order has been lifted. Thank you very much for your time and cooperation.

Sincerely,
Monica Lowney
Snoqualmie Resident/Community Advocate
PO Box 493
Snoqualmie, WA 98065

1.

Letter No. 34

Mark Hofman

From: Haley Williamson <haleymwilliamson@gmail.com>
Sent: Wednesday, May 13, 2020 3:50 PM
To: Mark Hofman
Cc: richard@rkscheel.net
Subject: Public Hearing request for DEIS at Proposed Mill Site

Categories: Green category

RECEIVED
MAY 13 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mark,

I am writing to request a Public Hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. Per WAC 197-11-535, a Public Hearing is required if fifty or more concerned and/or affected citizens request it.

I live in the Tokul community. We will be majorly impacted by the decisions of the Mill Site as we are located directly above the Mill Site and rely on Millpond Road, Tokul and 396th to get to our homes. Being that we are outside the city limits of Snoqualmie, the city has annexed land up to our back doors, including the Mill Site, and we have no way of voicing our concerns except in actual in-person public hearings. Otherwise, our community is silenced in this decision and we are by far the most impacted by the decisions surrounding the Mill Site.

An actual in-person Public Hearing is needed, at which all citizens in my community and everyone else who will be affected may be physically present, heard, and their concerns be taken seriously. In other words, it's imperative that this Public Hearing be held at a time when group gatherings are once again allowed. A virtual meeting for "Oral Comment" is insufficient. As a public school teacher navigating the world of online learning, I can confirm that online meetings do not work for important matters such as this. Concerned citizens may not all have access to the internet, a stable connection, a computer at the time of the meeting, and it is inequitable and unacceptable to host a meeting of this importance online when we cannot meet in person. 34-1

It is crucial that every stakeholder be given the unrestricted, in-person opportunity to be heard. It is shameful that the city would move to silence my community – the community that will be most impacted by these decisions – by not holding a Public Hearing.

I am a lifetime resident of the Tokul, Highland Drive, and Mill communities. We, on this side of the river, demand a voice in the development of *our* backyard.

Best,

Haley Williamson

40217 SE 53rd Street
Snoqualmie, WA 98065

Letter No. 35

Mark Hofman

From: xelmyck@centurytel.net
Sent: Wednesday, May 13, 2020 5:14 PM
To: Mark Hofman
Subject: public comment period

Categories: Green category

RECEIVED
MAY 13 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mark Hofman
Community Development Director
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Mr. Hofman,

I would like to request a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. Per WAC 197-11-535, a Public Hearing is required if fifty or more concerned and/or affected citizens request it.

The current crisis and social distancing guidelines cannot plausibly provide for an environment conducive to robust public comment. Public feedback should be solicited in an accessible manner and, crucially, in-person, so that the citizens who stand to be affected most directly can make their voices heard to the officials charged with making these decisions. It is vital the public has a chance to voice their thoughts and opinions before any action is decided upon. Accordingly, I would like to request an extension of this comment period until no sooner than 30 days after the conclusion of the public health emergency. As it is possible that there will be 50 or more citizens present for in person public comment, this would at the very least be after we have proceeded to phase four per Washington state's Safe Start plan. A remote online meeting will not be sufficient for stakeholders to offer critical public input. In good faith thi comment period must be extended until it is deemed safe to hold an in person public meeting on the Draft Environmental Impact Statement. 35-1

I qualify to make this request as I reside near Borst Lake and the proposed development. As a resident of the area for almost fifty years I have significant concerns regarding the history of this site and the environmental impact of the proposed project.

Thank you for your consideration,

Xandra Trostel

Xandra Trostel
PO Box 1917
Snoqualmie, WA
98065

Letter No. 36

Mark Hofman

RECEIVED
MAY 13 2020
City of Snoqualmie
Community Development Department

From: Elaine Armstrong <elaine.arm39@gmail.com>
Sent: Wednesday, May 13, 2020 5:47 PM
To: Mark Hofman
Subject: Comment on Draft Environmental Impact Statement and request for public hearing

Categories: Green category

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Mark Hofman
SEPA Responsible Official
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Mr. Hofman,

I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan.

It is necessary to have a public hearing in a manner where all citizens can be physically present and heard. This hearing should take place when it is possible to have group gatherings. This is a crucial project, spanning many years and the restriction of an online meeting and the chance of limited online access to the online meeting, as has been an issue in past meetings, will restrict the citizens and concerned parties to speak and be heard. All parties should have the chance to be heard as this project will have enormous impacts on our daily lives and health. 36-1

I qualify to make this request, as I am a citizen of the City of Snoqualmie. According to "WAC 197-11-535" a public hearing is required if fifty or more concerned and impacted citizens make a request.

Thank you for your time and consideration,

Elaine Armstrong

7726 Fairway Ave SE #502

Snoqualmie, WA 98065

ciò che è diverso provoca disagio. Cerca il diverso.
All that is different causes discomfort. Seek different.

Letter No. 37

Mark Hofman

From: Wayne <waynestuff@comcast.net>
Sent: Wednesday, May 13, 2020 9:04 PM
To: Mark Hofman
Cc: Dick Scheel
Subject: Snoqualmie Mill Site DEIS

Categories: Green category

RECEIVED
MAY 13 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan.

It is necessary to have a public hearing in a manner where all citizens can be physically present and heard. 37-1

This hearing should take place when it is possible to have group gatherings. This is a crucial project, the restriction of an online meeting and the chance of limited online access to the online meeting, as has been the issue in past meetings, will restrict the citizens and concerned parties to speak and be heard. All parties should have the chance to be heard.

Another issue is there are still many citizens who do not use computers or smart phones. As big as this project is a notice should be made available to all residents of the city. This could be or could have been done in utility billing? As a resident I am making this request of the City of Snoqualmie. According to "WAC 197-11-535" a public hearing is required if fifty or more concerned and impacted citizens make a request. 37-2

I also believe all citizens in unincorporated King County adjacent to the Mill Site should have been notified as they will be environmentally, traffic and noise and light pollution and flooding may affect them.

Thank you for your time and consideration,

Sincerely a concerned citizen,

Wayne A Russell
8438 Meadowbrook Way SE
Snoqualmie, WA 98065
Phone: 425-888-4789
Cell: 206-693-1520

Email: waynestuff@comcast.net

Letter No.38

Mark Hofman

From: Kristina Omalley <streganona38289@gmail.com>
Sent: Thursday, May 14, 2020 6:42 AM
To: Mark Hofman
Subject: Mill pond

Categories: Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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Please consider not developing the Mill Pond area. I know that is impossible, but why?
It will cause more traffic and stress on the Valley. We want trees and woods and waterfalls and ponds and creeks in woods. Not buildings and congestion.

38-1

We have beautiful golf courses here. We have beautiful hiking trails and beautiful rivers. We don't need any more buildings to clutter up our place. That's why it's called the Valley. People wouldn't want to use the local businesses because they can't get to them there's no parking it takes too long to get there as well.
C'mon Mark.

Christina Omalie
38289 SE Northern St, Snoqualmie, WA 98065
4256549160

Letter No.39

Mark Hofman

From:	Kolbi Tabakci <ktabakci@hotmail.com>
Sent:	Thursday, May 14, 2020 9:55 AM
To:	Mark Hofman
Cc:	richard@rkscheel.net
Subject:	Public Hearing Request for DEIS at proposed Mill Site
Attachments:	Public Hearing Request on DEIS.docx; ATT00001.htm
Categories:	Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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Mark,

Please see my attached request for a public hearing regarding the DEIS at the proposed Mill Site.

Best Regards,
Kolbi Tabakci

Kolbi Tabakci
40217 SE 53rd St
Snoqualmie, WA 98065

May 14, 2020

To whom it may concern,

It has come to my attention in recent weeks, that there is potential to build and develop in the Snoqualmie Mill Site. As a self proclaimed capitalist I would normally support business growth and opportunity for economic expansion, however I do not see how adding *another* winery, brewery, and boutique shopping center along with condo/apartment living will be significantly beneficial to an already saturated Snoqualmie and North Bend community.

Aside from the economic qualms I have, I have a request on behalf of the rural community I call my own. I think its utterly repulsive that I have no legal representation or opportunity to have my voice and the voices of my neighbors heard. Since the land I live on, is not within the Snoqualmie city limits, I do not get to vote on the issues I hold dear to my heart. Why this is so reprehensible, to me really has to do with how this affects me and my community. If the land I am on is not annexed yet the land just a stone's throw away from me is annexed, I see that as unfair and uncouth in nature. 39-1

I am writing to request a Public Hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/ Industrial (PCI) Plan as per WAC 197-11-535.

We as a community need to have a public hearing regarding the proposed Mill Site development. Our community deserves an opportunity to have our voices heard. It is inadequate to hold an online meeting when a public hearing in this matter is the minimum by which my community deserves. 39-2

I look forward to discussing the proposed Mill Plan in person at a public hearing.

Best Regards,

Kolbi Tabakci

Letter No. 40

Mark Hofman

From: kristina huntley <khuntley01@gmail.com>
Sent: Thursday, May 14, 2020 11:42 AM
To: Shared Mill Site EIS
Subject: Draft EIS Snoqualmie Mill Site

Categories: Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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Good Afternoon,

I am extremely concerned that the draft EIS still contains reference to a proposed amphitheater. The site is just over a mile from my home and the noise and traffic for such a venue would negatively impact valley residents. I am generally supportive of development of the site for retail but bringing in up to 5k people at a time during summer months would be bad for anyone that lives here. Please do not proceed with allowing this in our community. This action would destroy many of the elements we cherish living in Snoqualmie. 40-1

Kristina Huntley

--
Thanks, Kristina

Letter No.41

Mark Hofman

From: xelmyck@centurytel.net
Sent: Thursday, May 14, 2020 12:30 PM
To: Mark Hofman
Subject: Re: Response to "public comment period"

Categories: Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

None the less, the public (I.e. our community) has concerns about this Draft Environmental Impact Statement. Whether or not you are required to have a formal public meeting, it is the right thing to do in order to allow the public to adequately express their concerns without the distraction of an unprecedented health crisis. At the very least "the optional informal public meetings or workshops" should be postponed until the public has recovered from the impact of the health crisis and has had adequate time to regain their bearings, review the document, and formulate comments. People are currently coping with limited capacity due to the crisis and a virtual meeting this soon is not adequate. I am disappointed with this hasty and somewhat inconsiderate approach during a world wide pandemic. Please consider an extension of this comment period and a formal publicly attended hearing in good faith toward your community's concerns. 41-1

Xandra Trostel

----- Original Message -----
From: Mark Hofman <MHofman@snoqualmiewa.gov>
To: xelmyck@centurytel.net
Cc: Bob Sterbank <BSterbank@snoqualmiewa.gov>
Sent: Wed, 13 May 2020 20:25:19 -0400 (EDT)
Subject: Re: Response to "public comment period"

Ms. Trostel,

Thank you for your interest in the Snoqualmie Mill Ventures Planned Commercial / Industrial Plan (PCI Plan) proposal.

You have requested that a public hearing be held pursuant to WAC 197-11-535 on the Draft Environmental Impact Statement (DEIS) for the PCI Plan. A public hearing is not required. Instead, an optional public meeting is scheduled for next Wednesday, May 20, 2020 at 4 p.m. Please refer to the project page on the City website under the Community Development Department tab this week for more details.
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.snoqualmiewa.gov%2F393%2FMill-Site-Propert&data=02%7C01%7CMHofman%40snoqualmiewa.gov%7C812105214f7a474f40a708d7f83d401f%7C6490a800faa742789ad4853db3eab362%7C0%7C0%7C637250814276982499&sdata=t6DVl%2B4o5o4yKKvzVHEOkoch5kMBGlFkBMhGsmY6VyI%3D&reserved=0<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww

.snoqualmiewa.gov%2F393%2FMill-Site-Property&data=02%7C01%7CMHofman%40snoqualmiewa.gov%7C812105214f7a474f40a708d7f83d401f%7C6490a800faa742789ad4853db3eab362%7C0%7C0%7C637250814276992457&sdata=BF2YoBa5nfl9No9xf2HIaaWr02s3%2BuP2oMLe7JYnXtE%3D&reserved=0>y

Per WAC 197-11-535(1) and (2), a public hearing triggered by a request from 50 or more persons is required only when a public hearing will not be held on the proposal under "some other requirement of law." For the Snoqualmie Mill PCI Plan proposal, a public hearing is already required by "some other requirement of law, specifically, by the code provisions applicable to PCI Plan proposals, which include specifically the public hearing requirement in SMC Section 17.50.090(D). In light of this requirement, a public hearing on the DEIS or environmental impact of the PCI Plan is not required by WAC 197-11-535(2), which applies only to "all other cases" other than when public hearing on the proposal is required under 197-11-535(1) per "some other requirement of law."

I also note that, even where 197-11-535(2) applies, a public hearing is triggered only when requested by 50 or more persons residing within the City of Snoqualmie. We have not received anywhere close to that number of requests.

Even though a public hearing on a DEIS is not required, under WAC 197-11-535(6), the city "may hold informal public meetings or workshops" on the DEIS, and "such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings." The public meeting scheduled for 4 pm, May 20, 2020 which is optional, is being held under this regulation to invite oral comments on the DEIS. A court reporter will transcribe the public meeting, and a transcript of the meeting will be included in the Final Environmental Impact Statement (FEIS).

Thank you again for your interest in the Snoqualmie Mill PCI Plan proposal.

From: xelmyck@centurytel.net <xelmyck@centurytel.net>
Sent: Wednesday, May 13, 2020 5:14 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: public comment period

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Mark Hofman
Community Development Director
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Mr. Hofman,

I would like to request a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. Per WAC 197-11-535, a Public Hearing is required if fifty or more concerned and/or affected citizens request it.

The current crisis and social distancing guidelines cannot plausibly provide for an environment conducive to robust public comment. Public feedback should be solicited in an accessible manner and, crucially, in-person, so that the citizens who stand to be affected most directly can make their voices heard to the officials charged with making these decisions. It is vital the public has a chance to voice their thoughts and opinions before any action is decided upon. Accordingly, I would like to request an extension of this comment period until no sooner than 30 days after the conclusion of the public health emergency. As it is possible that there will be 50 or more citizens present for in person public comment, this would at the very least be after we have proceeded to phase four per Washington state's Safe Start plan. A remote online meeting will not be sufficient for stakeholders to offer critical public input. In good faith this comment period must be extended until it is deemed safe to hold an in person public meeting on the Draft Environmental Impact Statement.

I qualify to make this request as I reside near Borst Lake and the proposed development. As a resident of the area for almost fifty years I have significant concerns regarding the history of this site and the environmental impact of the proposed project.

Thank you for your consideration,

Xandra Trostel

Xandra Trostel
PO Box 1917
Snoqualmie, WA
98065

Letter No. 42

Mark Hofman

From: Phil Williamson <philip.bruce.williamson@gmail.com>
Sent: Thursday, May 14, 2020 3:04 PM
To: Mark Hofman
Cc: richard@rkscheel.net
Subject: Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

Categories: Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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Mark Hofman
Community Development Director, City of Snoqualmie

Hi Mark,

As a property owner adjacent to the proposed Snoqualmie Mill Commercial/Industrial (PCI) Plan, I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) after the current Covid-19 restrictions are lifted.

Given the potential impact to my neighbors, the (already compromised) environment of the site, and additional traffic burdens this would create, it is imperative that a public hearing be held to allow all citizens to be physically present. 42-1

Since online meetings do not allow for a meaningful and forthright exchange, and can be unreliable, I am referencing "WAC 197-11-535", whereby a public hearing is required if fifty or more concerned and impacted citizens make a request.

As potential neighbors of the proposed development, we will be most impacted by the decisions made by City of Snoqualmie officials (even though we are not represented by them). I am not necessarily opposed to this development; I just think we are owed transparency and an opportunity to be heard.

Sincerely,

Philip Williamson
40601 SE 60th Street
Snoqualmie, WA 98065
--
-
Philip Williamson
206-714-1187

Letter No. 43

Mark Hofman

From: Julie Christensen <kajupety@gmail.com>
Sent: Thursday, May 14, 2020 7:11 PM
To: Mark Hofman
Cc: richard@rkscheel.net
Subject: Mill Site Plan

Categories: Green category

RECEIVED
MAY 14 2020
City of Snoqualmie
Community Development Department

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May 14, 2020

Mark Hofman
Community Development Director
City of Snoqualmie,

I would like to request a public hearing on the Draft Environmental Impact Statement for the proposed Snoqualmie Mill Planned Commercial/Industrial Plan. Additionally, I request that this meeting be scheduled at a time when group gatherings are allowed in King County so that all citizens have an opportunity to physically be present and heard. I am concerned that restrictions imposed by an online meeting would hinder participation. I feel this issue is very important to the future of our community and all parties should have the opportunity to be heard.

According to WAC 197-11-535, a Public Hearing is required if fifty or more concerned and impacted citizens make a request. Although my residence is outside city limits, it is located off SE 60th ST just above the Mill Site property, and I will be significantly impacted by this project.
I am deeply concerned about the impact of the project on local traffic and noise levels affecting my family's quality of life.

43-1

Thank you for your time and consideration,
Julie K. Christensen
40427 SE 60th St
Snoqualmie, WA 98065

Letter No. 44

Mark Hofman

From: Matthew Baerwalde <Mattb@snoqualmietribe.us>
Sent: Friday, May 15, 2020 3:59 PM
To: Mark Hofman; Jason Rogers
Subject: Request for comment deadline extension

Categories: Green category

RECEIVED
MAY 15 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Mark and Jason,

I hope this email finds you well. I am writing to respectfully request an extension of an additional 30 days to review and respond to the Mill Site DEIS. While I appreciate the 45 day comment period vs. the minimum 30 days, because of the following reasons, I request some additional time:

- Even though the City has been able to work with the proponent for over 2 years on the DEIS, this is the first tim the Tribe has been able to review well over 1000 pages of technical documents.
- Snoqualmie Indian Tribe is operating at reduced capacity due to staff furloughs and numerous other impacts of the Covid-19 crisis, which have created more work for remaining staff, while at the same time introducing complexities that make that work slower to get done.
- While staff coordination is one thing (and currently challenging as described above) we also need to coordinate with the Tribal Council. Council is currently overwhelmed with issues relating to the ongoing public emergency, and as important as the Mill Site DEIS is to the Tribe, it is extremely challenging to find Council time for anything not directly related to said public emergency.

44-1

We appreciate the amount of work that went into preparing the DEIS, and the amount of work for the City that remains after conclusion of the current comment period. An additional 30 days after June 11th would allow the Tribe to prepare comprehensive and thoughtful comments that will contribute to a more efficient and productive outcome for all stakeholders. Thank you for considering this request.

Sincerely,
Matt

Matthew J. Baerwalde
Environmental Policy Analyst
Snoqualmie Indian Tribe Environmental & Natural Resources Dept.
mailing: PO Box 969, Snoqualmie WA 98065
physical: 9416 384th Ave SE, Snoqualmie WA 98065
mobile 425-495-4111
mattb@snoqualmietribe.us (he/him/his)

Letter No.45

Mark Hofman

From: Phil Williamson <philip.bruce.williamson@gmail.com>
Sent: Saturday, May 16, 2020 10:21 AM
To: Mark Hofman
Subject: Re: Response to "Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan"

Categories: Green category

RECEIVED
MAY 16 2020
City of Snoqualmie
Community Development Department

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Thanks for the prompt reply Mark.

You make the point that since we live in unincorporated King County our input is limited to a Zoom meeting, when we are the very citizens who will be directly impacted if there are adverse outcomes. I understand that a public hearing is not required and our leverage is limited. I am not opposed to the plan but my point was that the optics of the City of Snoqualmie (once again) making land use decisions without meaningful input from the people most invested, simply because you can are not great.

Your point regarding a public hearing is triggered only when requested by 50 or more persons **residing within the City of Snoqualmie is understood. But it also includes the following:** (b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS; Perhaps I am not understanding something? 45-1

Lastly, you note that you haven't received "anywhere close to that number of requests and requests from residents outside the city limits don't seem to qualify under WAC 197-11-535(2)". Whether you do receive 50 requests or not, grassroots efforts take time and even if that threshold isn't met, I simply want my position to be on the record as an engaged citizen.

Thanks again for your time and consideration.

On Thu, May 14, 2020 at 3:15 PM Mark Hofman <MHofman@snoqualmiewa.gov> wrote:
Mr. Williamson,

Thank you for your interest in the Snoqualmie Mill Ventures Planned Commercial / Industrial Plan (PCI Plan) proposal.

You have requested that a public hearing be held pursuant to WAC 197-11-535 on the Draft Environmental Impact Statement (DEIS) for the PCI Plan. A public hearing is not required. Instead, an optional public meeting is scheduled for next Wednesday, May 20, 2020 at 4 p.m. Please refer to the project page on the City website under the Community Development Department tab this week for more details.

Per WAC 197-11-535(1) and (2), a public hearing triggered by a request from 50 or more persons is required only when a public hearing will ***not*** be held on the proposal under "some other requirement of law." For the Snoqualmie Mill PCI Plan proposal, a public hearing is already required by "some other requirement of law, specifically, by the code provisions applicable to PCI Plan proposals, which include specifically the public hearing requirement in SMC Section 17.50.090(D). In light of this requirement, a public hearing on the DEIS or environmental impact of the PCI Plan is *not* required by WAC 197-11-535(2), which applies only to "all other cases" other than when public hearing on the proposal is required under 197-11-535(1) per "some other requirement of law."

I also note that, even where 197-11-535(2) applies, a public hearing is triggered only when requested by 50 or more persons **residing within the City of Snoqualmie**. We have not received anywhere close to that number of requests and requests from residents outside the city limits don't seem to qualify under WAC 197-11-535(2). As you reside in the unincorporated county outside city limits, you are still welcome to comment in writing on the DEIS by the 11:59 pm June 11, 2020 deadline or give oral comment at the May 20, 2020, 4pm public meeting.

Even though a public hearing on a DEIS is not required, under WAC 197-11-535(6), the city "may hold informal public meetings or workshops" on the DEIS, and "such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings." The public meeting scheduled for 4 pm, May 20, 2020 which is optional, is being held under this regulation to invite oral comments on the DEIS. A court reporter will transcribe the public meeting, and a transcript of the meeting will be included in the Final Environmental Impact Statement (FEIS).

Thank you again for your interest in the Snoqualmie Mill PCI Plan proposal.

From: Phil Williamson <philip.bruce.williamson@gmail.com>
Sent: Thursday, May 14, 2020 3:04 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Cc: richard@rkscheel.net <richard@rkscheel.net>
Subject: Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Mark Hofman
Community Development Director, City of Snoqualmie

Hi Mark,

As a property owner adjacent to the proposed Snoqualmie Mill Commercial/Industrial (PCI) Plan, I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) after the current Covid-19 restrictions are lifted.

Given the potential impact to my neighbors, the (already compromised) environment of the site, and additional traffic burdens this would create, it is imperative that a public hearing be held to allow all citizens to be physically present.

Since online meetings do not allow for a meaningful and forthright exchange, and can be unreliable, I am referencing "WAC 197-11-535", whereby a public hearing is required if fifty or more concerned and impacted citizens make a request.

As potential neighbors of the proposed development, we will be most impacted by the decisions made by City of Snoqualmie officials (even though we are not represented by them). I am not necessarily opposed to this development; I just think we are owed transparency and an opportunity to be heard.

Sincerely,

Philip Williamson
40601 SE 60th Street
Snoqualmie, WA 98065
--
-
Philip Williamson
206-714-1187

--
-
Philip Williamson
206-714-1187

Letter No. 46

Mark Hofman

From: Dawn Harper <dawninsnoq@gmail.com>
Sent: Saturday, May 16, 2020 11:31 AM
To: Mark Hofman
Subject: Mill Site Development

Categories: Green category

RECEIVED
MAY 16 2020
City of Snoqualmie
Community Development Department

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Even though the idea of this sounds lovely, the impact of this development would be catastrophic for the valley. Let's first start with the fact that this area is flood plain. Anyone who has lived in the valley knows what happens to that area during floods. I assume you would be adding fill to raise the area? How would this dispersement of affect the valley, both upper and lower? The water has to go somewhere. The water displacement will, without a doubt, affect the rest of the valley, both upper and lower valley. 46-1

Then there is the issue of traffic. Already, as a resident of historic downtown Snoqualmie, I risk my life taking a left hand turn onto highway 202; truly. 202 already can not handle the traffic it already experiences. Adding more people, more traffic is not sustainable. The entire downtown traffic plan would need to be recalculated, restructured. Again, this would have a huge environmental and community impact. Is this plan being shared with residence as part of this development? If not, you are not being transparent with the community. Same for the plan of how to disperse the water the new development with displace. All of this needs to be shared with valley residences, from North Bend to Carnation, as it will affect them. 46-2

The Mill Pond itself is a source of rich wildlife. Elk, beaver, otter, abundance of birds, turtles, fish, frogs, all call the pond and center island home. This development would affect this wildlife and habitat indefinitely. Does the impact statement consider the dispersement of this wildlife? It must. 46-3

Then there is the historical value of the site. The mill site has a long, rich, history in this valley. Wouldn't it be better to turn this area into a preserved natural area, or park, which embraces the history and celebrates it for all to learn from and remember? Driving through town, and seeing the ghost stumps from the old growth trees that once dominated this valley should be reminder enough that development and "progress" are not always best, that once begun can not be undone. 46-4

Please rethink this development. The financial backers and planners may have you believing this is a good thing for the valley. While they will benefit, the valley residences, habitat, and fragile ecosystem will pay the consequences. 46-5

Thank you for listening to my comments,
Dawn Harper
Dawninsnoq@gmail.com
424-301-1255

Letter No.47

Mark Hofman

From: Ike B <ikerobert8@gmail.com>
Sent: Saturday, May 16, 2020 1:50 PM
To: Mark Hofman
Cc: richard@rkscheel.net
Subject: Public Hearing

Categories: Green category

RECEIVED
MAY 16 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. It is necessary to have a public hearing in a manner where all citizens can be physically present and heard. This hearing should take place when it is possible to have group gatherings. This is a crucial project, the restriction of an online meeting and the chance of limited online access to the online meeting, as has been the issue in past meetings, will restrict the citizens and concerned parties to speak and be heard. All parties should have the chance to be heard. 47-1

I qualify to make this request, as I am a citizen of the City of Snoqualmie. According to "WAC 197-11-535" a public hearing is required if fifty or more concerned and impacted citizens make a request.

Thank you for your time and consideration,
Ike Balmer
8054 Maple Ave SE
Snoqualmie Wa 98065

Letter No. 48

Mark Hofman

From: Emily Lee <emilyellen24@gmail.com>
Sent: Saturday, May 16, 2020 2:36 PM
To: Mark Hofman
Subject: Mill Site Development

Categories: Green category

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MAY 16 2020
City of Snoqualmie
Community Development Department

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To whom it may concern,

I am writing to express serious concerns about plans to develop the Snoqualmie Mill Site.

To begin with, that site is 100% flood plain. I don't understand how this kind of development can happen on flood plain in the first place, but even if it's possible, I believe the impact to the community will be overwhelmingly negative. Not only do I have concerns about water displacement (I am a homeowner in downtown Snoqualmie and already have to grapple with seasonal flooding), I also have concerns about the impact of the development on wildlife. I believe traffic in the area will be impacted as well, and as someone who commutes to work each day via Highway 202, I am not happy about the potential impact on that highway. 48-1 48-2 48-3

Finally, what brought me to Snoqualmie in the first place was the way our city values our history. Our pride in our local history is clear on every block, and our residents work hard to ensure that our growth does not erase that history. I believe that the Mill Site Development plans erase a critical piece of our city's history and thus identity. 48-4

I am strongly opposed to the development and urge the city to reconsider.

Thank you for your time,
Emily Lee

39112 SE Gamma St.
Snoqualmie, WA 98065

Sent from my iPhone

Letter No. 49

Mark Hofman

From: Dawn Harper <dawninsnoq@gmail.com>
Sent: Saturday, May 16, 2020 2:40 PM
To: Mark Hofman
Subject: Public Meeting About Mill Pond Development

Categories: Green category

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MAY 16 2020
City of Snoqualmie
Community Development Department

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I have sent in my concerns regarding the Mill Pond Development. I would like to request the meeting be held off until in-person comments can be heard. This development will affect our entire valley, not just Snoqualmie. All should be able to express their concern, in person, not via online meeting where the technology may or may not work and where community members can not be in the safe room to discuss an issue that faces all. 49-1

Thank you,
Dawn Harper

Letter No. 50

Mark Hofman

From: Emily Lee <emilyellen24@gmail.com>
Sent: Saturday, May 16, 2020 2:53 PM
To: Mark Hofman
Subject: In-Person Public Hearing Request

Categories: Green category

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MAY 16 2020
City of Snoqualmie
Community Development Department

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To whom it may concern,

I am a resident of Snoqualmie (39112 SE Gamma St. Snoqualmie, WA 98065), and I am writing to request an in-person public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. I realize this means that it will have to occur after large meetings are allowed again. I have serious concerns about holding this hearing online, because I know the city has held online meetings and the tech did not work correctly, and people who wished to speak were not heard. Therefore, I believe the hearing for this very significant project should be held in-person, so that no one is denied a right to speak. 50-1

I am aware that state law WAC 197-11-535 requires a public hearing when enough citizens request one, so I am adding my voice to that collective request.

Thank you for your time,
Emily Lee

Sent from my iPhone

Letter No. 51

Mark Hofman

From: Andrea Williamson <snoqualmiedesign@gmail.com>
Sent: Sunday, May 17, 2020 12:26 PM
To: Mark Hofman
Subject: Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan
Categories: Green category

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City of Snoqualmie
Community Development Department

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Mark Hofman
Community Development Director, City of Snoqualmie

Mr. Hofman,

As a property owner adjacent to the proposed Snoqualmie Mill Commercial/Industrial (PCI) Plan, I am requesting a public hearing on the Draft Environmental Impact Statement (DEIS) after the current Covid-19 restrictions are lifted. I qualify to make this request as I live less than a mile from the site and would be adversely affected by the environmental impact of the proposal. Additionally, I have personal experience of the sometimes poor internet service in this area that could potentially affect the ability of my neighbors to voice their opinions at the May 20th public online meeting. 51-1

Given the potential impact to my neighbors, the environment sensitivities of the site, and additional traffic burdens this would create, it is imperative that a public hearing be held to allow all citizens to be physically present.

Thank you for your consideration,

Andrea Williamson
40601 SE 60th Street
Snoqualmie, WA 98065

Letter No.52

Mark Hofman

From: Olson's Tack Shop <mike@olsonstack.com>
Sent: Sunday, May 17, 2020 1:34 PM
To: Mark Hofman
Subject: Opposition to proposed Snoqualmie Mill Site Project

Categories: Green category

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MAY 17 2020
City of Snoqualmie
Community Development Department

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As a resident of Snoqualmie I am asking for an in person public hearing (WAC 197-11-535) as the project will adversely affect my overall quality of life. I do not believe that the studies regarding traffic, wetlands, environmental, and social impacts have been thoroughly considered and that more work needs to be done. 52-1 52-2

I will be attending the meeting on Wednesday May 20th.

Mike Akers, President
Olson's Tack Shop
425-454-9453 text/phone



Letter No. 53

Mark Hofman

From: Emily Lee <emilyellen24@gmail.com>
Sent: Sunday, May 17, 2020 6:04 PM
To: Mark Hofman
Subject: Re: Response to "In-Person Public Hearing Request"

Categories: Green category

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MAY 17 2020
City of Snoqualmie
Community Development Department

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Hi Mark,

Thanks for taking the time to respond. I do want to note that my request was actually for an in-person public hearing. My concern is that the public meeting is to be held remotely since it is scheduled for next week and we are still under the stay at home orders.

Holding such an important meeting online limits the access Snoqualmie residents and other affected parties have. Even if the technology works perfectly (which, as I noted in my previous email, has not always been the case at these meetings), I believe this is an inequitable way to hold this meeting because only residents with internet access may attend. This meeting should be held in a manner that allows every interested stakeholder to attend and be heard, which means delaying the meeting until it can be held in person. Every voice should be counted - not just those of us with internet access during this time. 53-1

Thank you again for your consideration,
Emily Lee

Sent from my iPhone

On May 17, 2020, at 2:41 PM, Mark Hofman <MHofman@snoqualmiewa.gov> wrote:

Ms. Lee,

Thank you for your interest in the Snoqualmie Mill Ventures Planned Commercial / Industrial Plan (PCI Plan) proposal.

You have requested that a public hearing be held pursuant to WAC 197-11-535 on the Draft Environmental Impact Statement (DEIS) for the PCI Plan. A public hearing is not required. Instead, an optional public meeting is scheduled for next Wednesday, May 20, 2020 at 4 p.m. Please refer to the project page on the City website under the Community Development Department tab this week for more details. You are still welcome to comment in writing on the DEIS by the 11:59 pm June 11, 2020 deadline.

Per WAC 197-11-535(1) and (2), a public hearing triggered by a request from 50 or more persons is required only when a public hearing will ***not*** be held on the proposal under "some

other requirement of law." For the Snoqualmie Mill PCI Plan proposal, **a public hearing is already required** by "some other requirement of law, specifically, by the code provisions applicable to PCI Plan proposals, which include specifically the public hearing requirement in SMC Section 17.50.090(D). In light of this requirement, a public hearing on the DEIS or environmental impact of the PCI Plan is *not* required by WAC 197-11-535(2), which applies only to "all other cases" other than when public hearing on the proposal is required under 197-11-535(1) per "some other requirement of law."

I also note that, even where 197-11-535(2) applies, a public hearing is triggered only when requested by 50 or more persons residing within the City of Snoqualmie. We have not received anywhere close to that number of requests.

Even though a public hearing on a DEIS is not required, under WAC 197-11-535(6), the city "may hold informal public meetings or workshops" on the DEIS, and "such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings." The public meeting scheduled for 4 pm, May 20, 2020 which is optional, is being held under this regulation to invite oral comments on the DEIS. A court reporter will transcribe the public meeting, and a transcript of the meeting will be included in the Final Environmental Impact Statement (FEIS).

Thank you again for your interest in the Snoqualmie Mill PCI Plan proposal.

From: Emily Lee <emilyellen24@gmail.com>
Sent: Saturday, May 16, 2020 2:52 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: In-Person Public Hearing Request

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

To whom it may concern,

I am a resident of Snoqualmie (39112 SE Gamma St. Snoqualmie, WA 98065), and I am writing to request an in-person public hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. I realize this means that it will have to occur after large meetings are allowed again. I have serious concerns about holding this hearing online, because I know the city has held online meetings and the tech did not work correctly, and people who wished to speak were not heard. Therefore, I believe the hearing for this very significant project should be held in-person, so that no one is denied a right to speak.

I am aware that state law WAC 197-11-535 requires a public hearing when enough citizens request one, so I am adding my voice to that collective request.

Thank you for your time,
Emily Lee

Letter No.54

Mark Hofman

From: Amy <amykosche12@gmail.com>
Sent: Sunday, May 17, 2020 8:20 PM
To: Mark Hofman
Subject: Mill Pond Hearing

Categories: Green category

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MAY 17 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Hoffman,

I am writing to ask that the Mill Pond Development public hearing be an in-person meeting once it is allowed due to the stay at home order being lifted. The city has had several cases where their online meetings have not worked correctly, resulting in people who wished to speak but were not heard. Because this is such a significant project, it is important that nobody is denied the right to speak. 54-1

State law that addresses this in WAC 197-11-535.

I reside within the city limits of Snoqualmie.

Thank you,
Amy Kosche

Letter No. 55

Mark Hofman

From: Greg Balmer <gregbalmer@hotmail.com>
Sent: Sunday, May 17, 2020 9:47 PM
To: Mark Hofman
Subject: Mill Site Development Meeting

Categories: Green category

RECEIVED
MAY 17 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

I am sending this email to you to request that the upcoming meeting for the EIS review on the proposed Mill Site Development be postponed until a proper meeting can be held allowing all concerned parties to be in the same room.

The virtual meeting that the city is proposing does not seem to be a forum where this important issue can be given the attention it deserves.

I have serious concerns about this project. It does not appear that the city has the road capacity or water capacity to support this development. Who will be paying the added costs for utilities, roads, maintenance etc.? How would this large development impact the river and the surrounding flood plain?
There are issues with noise and other enviromental issues to important to our city to just have a quick online event. 55-1

As a citizen, home owner and business owner in the city of Snoqualmie, I again request that this meeting be held at a later date when we can meet physically.

Thanks for your consideration on this matter.

Greg Balmer

Sent from Outlook

Letter No.56

Mark Hofman

From: Phil Williamson <philip.bruce.williamson@gmail.com>
Sent: Monday, May 18, 2020 8:36 AM
To: Mark Hofman
Subject: Re: Response to "Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan"

Categories: Green category

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MAY 18 2020
City of Snoqualmie
Community Development Department

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Thanks for the clarification Mark. I don't pretend to understand the DEIS/PCI process and I am not trying to be a nuisance. It just feels that the outcome is preordained regardless of the impact on my neighbors. I will review and let you know if I have further questions.

On Sun, May 17, 2020 at 2:27 PM Mark Hofman <MHofman@snoqualmiewa.gov> wrote:
Thank you, Mr. Williamson.

It occurred to me this weekend that one portion of my email response may not be clear to all in that a public hearing will be held for the PCI Plan, most likely at the Planning Commission. I can talk with you this week if you would like. I assume your comment is specific to requesting a public hearing on the DEIS but could clarify if you mean at some point on the PCI Plan/project? Either way, your public comment is not limited to a zoom meeting and we will take written comment on the DEIS until 11:59 pm June 11, 2020 if you would prefer. 56-1

From: Phil Williamson <philip.bruce.williamson@gmail.com>
Sent: Saturday, May 16, 2020 10:20 AM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: Re: Response to "Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan"

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Thanks for the prompt reply Mark.

You make the point that since we live in unincorporated King County our input is limited to a Zoom meeting, when we are the very citizens who will be directly impacted if there are adverse outcomes. I understand that a public hearing is not required and our leverage is limited. I am not opposed to the plan but my point was that the optics of the City of Snoqualmie (once again) making land use decisions without meaningful input from the people most invested, simply because you can are not great.

Your point regarding a public hearing is triggered only when requested by 50 or more persons **residing within the City of Snoqualmie is understood. But it also includes the following:** (b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the

Letter No. 57

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Monday, May 18, 2020 12:47 PM
To: Mark Hofman
Cc: Matt Larson; Bob Sterbank
Subject: RE: Response to "Please delay the Mill Site Draft EIS public review until after the shutdown"

Categories: Green category

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MAY 18 2020
City of Snoqualmie
Community Development Department

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Hi Mark,

I have a related question. In the highlighted sentences below, you mention a 180 day window for completion of the draft EIS. What is considered to be the start of that 180 day period? So far, I haven't found anything in state or local code that specifies that, so I assume that I just haven't found the right place. Is it the date of the Determination of Significance, or the date that the application was determined to be complete, or the date of the scoping meeting, or some other date? 57-1

Thanks,
Dick Scheel

From: Mark Hofman <MHofman@snoqualmiewa.gov>
Sent: Wednesday, May 13, 2020 12:04 PM
To: Dick Scheel <dickscheel@outlook.com>
Cc: Matt Larson <MLarson@snoqualmiewa.gov>; Bob Sterbank <BSterbank@snoqualmiewa.gov>
Subject: Re: Response to "Please delay the Mill Site Draft EIS public review until after the shutdown"

Mr. Scheel,

Regarding your request that the City delay the Draft Environmental Impact Statement (DEIS) review period, please note that the DEIS has already been issued, and notice of its issuance published as provided in applicable regulations.

Under the Department of Ecology's model SEPA Rules in WAC 197-11, which you cite in some of your other e-mail correspondence, the DEIS comment period begins when the City SEPA Responsible Official issues the DEIS, sends it to list of agencies and members of the public listed in WAC 197-11-455(1), makes copies of the DEIS available, and sends a notice of availability as outlined in 197-11-455(2)-(5). Issuance of the DEIS triggers the public comment period under WAC 197-11-455(6), which is 30 days unless extended by 15 days by request, for a total of 45 days. The DEIS has already been issued, the applicant already requested the 15-day extension, and the City has already granted it. So, the public comment period is already under way, and

the City is not in a position to pull back a DEIS that has already been issued, or delay the review period as you request. Your request is really a request for additional time for submission of written comments, which is not provided for by applicable regulations.

Please also keep in mind that most land use applications – including environmental review associated with the applications -- are subject to legally-required processing deadlines that require City review and action within a specified time. For environmental impact statements, the Snoqualmie Municipal Code (19.04.080(C)) requires completion of a draft EIS within 180 days, unless the applicant and City agree in writing to a longer time. The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant-City agreement to an additional time extension.

With respect to your comments about the restrictions on gathering under the Governor's order, please note that the DEIS comment period is a time for submission of *written* comments on the DEIS. The ability to submit written comments is not affected by the Governor's orders. Written comments are typically prepared by one or more individuals, not jointly drafted in an in-person group meeting. To the extent that individuals desire to communicate with each other and collaborate on written comments, they are welcome to share ideas and drafts electronically, and to discuss them with each other by phone and video conference calls, in much the same manner as city staff and other people around the world have been doing, quite effectively, for the last two months. It should also be recognized that the Governor's orders have provided more time to do this, rather than less, because some individuals who were working are now staying at home and not working, and even those who now work from home have gained time they previously spent commuting.

The bottom line is that a public comment period on a DEIS is a time for preparation and submission of written comments. The applicable regulations are not premised on group meetings, but rather provide a time period for agencies, tribes, and individuals to prepare and submit comments. The comment opportunity afforded by those regulations is not affected by the Governor's orders, and the City does not have an ability to "un-issue" the DEIS or extend the comment period beyond the additional 15-day extension the City has already granted.

Thank you

From: Dick Scheel <dickscheel@outlook.com>
Sent: Sunday, May 10, 2020 3:56 PM
To: Matt Larson <MLarson@snoqualmiewa.gov>; Mark Hofman <MHofman@snoqualmiewa.gov>
Cc: editor@valleyrecord.com <editor@valleyrecord.com>; info@livingsnoqualmie.com <info@livingsnoqualmie.com>
Subject: Please delay the Mill Site Draft EIS public review until after the shutdown

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To: Matt Larson, Snoqualmie Mayor
Mark Hofman, Snoqualmie Community Development Director / SEPA Responsible Official

The DEIS does not require a public hearing and we are holding a public meeting to provide an opportunity to give oral comment during the 45 day review and comment period. Many of the comments we've received specifically cite a section of WAC and request a public hearing for the DEIS. In answering, we don't want it to appear we are saying there won't be a public hearing for the PCI Plan application. There will.

I hope that helps but can talk further if that is acceptable with you. Much thanks.

From: Emily Lee <emilyellen24@gmail.com>
Sent: Sunday, May 17, 2020 6:03 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: Re: Response to "In-Person Public Hearing Request"

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Hi Mark,

Thanks for taking the time to respond. I do want to note that my request was actually for an in-person public hearing. My concern is that the public meeting is to be held remotely since it is scheduled for next week and we are still under the stay at home orders.

Holding such an important meeting online limits the access Snoqualmie residents and other affected parties have. Even if the technology works perfectly (which, as I noted in my previous email, has not always been the case at these meetings), I believe this is an inequitable way to hold this meeting because only residents with internet access may attend. This meeting should be held in a manner that allows every interested stakeholder to attend and be heard, which means delaying the meeting until it can be held in person. Every voice should be counted - not just those of us with internet access during this time.

Thank you again for your consideration,
Emily Lee

Sent from my iPhone

> On May 17, 2020, at 2:41 PM, Mark Hofman <MHofman@snoqualmiewa.gov> wrote:
>
> Ms. Lee,
>
> Thank you for your interest in the Snoqualmie Mill Ventures Planned Commercial / Industrial Plan (PCI Plan) proposal.
>
> You have requested that a public hearing be held pursuant to WAC 197-11-535 on the Draft Environmental Impact Statement (DEIS) for the PCI Plan. A public hearing is not required. Instead, an optional public meeting is scheduled for next Wednesday, May 20, 2020 at 4 p.m. Please refer to the project page on the City

Letter No.58

Mark Hofman

From: Emily Lee <emilyellen24@gmail.com>
Sent: Monday, May 18, 2020 1:17 PM
To: Mark Hofman
Subject: Re: Response to "In-Person Public Hearing Request"

Categories: Green category

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MAY 18 2020
City of Snoqualmie
Community Development Department

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Hi Mark,

Thank you again for taking the time to once again respond, I do appreciate it.

Am I understanding you correctly that the purpose of the May 20 remote meeting is to solicit public comments that may be relevant to the DEIS/FEIS, and that later there will be a public hearing on the entire project/application? If so, I understand that the May 20 remote meeting is optional, but again I would urge you to consider how we can equitably ensure access to every step of this process. There will certainly be Snoqualmie residents who are impacted by this project (and who may very well have relevant comments or information that should be included in the FEIS) who do not currently have internet access or the ability to navigate an online/remote meeting. I understand your point that the WAC I initially cited is not relevant in this situation (and I thank you for helping me better understand this process!), but I maintain that it is simply the right thing to do to ensure this process is as transparent and equitable as possible at every step of the way, including the analysis of the impact of this project on our local environment, residents, and economy. 58-1

Thanks again Mark,
Emily

Sent from my iPhone

On May 17, 2020, at 7:24 PM, Mark Hofman <MHofman@snoqualmiewa.gov> wrote:

Hi Emily,

Were your comments specific only to the DEIS or the project (PCI Plan)? The reason I ask is that there will indeed be a public hearing after the DEIS/FEIS. The City can hold only one open record public hearing for an application and it is a requirement of the planned commercial industrial master plan process in the Snoqualmie Municipal Code to hold a public hearing. I can talk by phone with you before Wednesday night if that would be helpful, and outline some of the information we will preliminary touch on Wednesday in regard to the PCI Plan and DEIS/FEIS going to Planning Commission for full review and a recommendation. After Planning Commission, the PCI Plan and DEIS/FEIS materials go to the City Council.

Letter No.59

Mark Hofman

From: dana.hubanks <dana.hubanks@gmail.com>
Sent: Monday, May 18, 2020 7:33 PM
To: Mark Hofman
Subject: request for public hearing re: Mill Site DEIS

Categories: Green category

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MAY 18 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

I am emailing to formally request that the City of Snoqualmie hold an in-person public hearing to present, review and intake public comment for the DEIS for the Mill Site PCIP. Of course, such a public hearing would need to be held after the quarantine regulations shift to allow larger public meetings. I am requesting that the City postpone any forward movement on this project until these circumstances open in order to allow us all to gather and discuss this as a community. 59-1

I am personally impacted by the proposed Mill Site development project as my home is within two miles of the property in question.

I submit this request in accordance with WAC 197-11-535.

Thank you,
Dana Hubanks

Letter No. 60

Mark Hofman

From: Dave Eiffert <daveeiffert@gmail.com>
Sent: Tuesday, May 19, 2020 6:24 AM
To: Shared Mill Site EIS
Subject: Survey Results

Categories: Green category

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MAY 19 2020
City of Snoqualmie
Community Development Department

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In an effort to gauge the feelings toward the proposed Mill development DEIS, the Snoqualmie Historic District Merchants Association constructed an online survey, and gave all merchants access to it for two weeks. There were 9 respondents. Because I am not associated with any business in the Historic District, I did not take the survey. A summary of responses is below, and the full detail of each response is inset below the summaries.

We appreciate the opportunity to submit the sentiments of the businesses represented by SHDMA on the Mill development DEIS.

Question 1: Do you believe the overall Mill development will benefit the historic downtown businesses?
7 respondents answered Yes and 2 respondents answered No.

Question 2: Please explain your response to Question 1.
7 respondents said the development would probably increase business by drawing more tourists to the area. 1 respondent felt the development would increase peak period congestion. *

Question 3: Do you believe the amphitheater should be allowed in the Mill development?
5 respondents answered Yes and 4 answered No.

60-1

Question 4: Please explain your answer to question 3:
2 respondents thought it would increase congestion. 2 respondents thought it would increase business. 2 respondents gave unsubstantial answers. 1 respondent that they believed the amphitheater was removed from the plan during a prior city council meeting.**

Question 5: What kind of business do you have?
3 respondents indicated Retail Oriented Toward Local Residents. 3 respondents indicated Food and Beverage. 2 respondents indicated Tourist Oriented Retail. 1 respondent indicated Other.

Answer detail:

* Question 2:

1. Actually, I don't know it will benefit historic business, but I think we can hold our own. There's always the chance it will even increase business as people come down the Parkway.
2. It will most likely cause increased congestion near the falls, which is already over capacity on weekends in the summer and will compete with downtown for visitors and customers.
3. I think more people will head to downtown Snoqualmie if this were to be developed.
4. I am a small business owner in the downtown Snoqualmie historic district. Our business is heavily reliant on tourism, and depend on summer revenue from tourism. I am opposed to this development, however,

due to the following concerns: environmental impact on wildlife, residential noise, Increased traffic, increase in DUI's, and overall impact to daily life and adjustments in the Snoqualmie Valley area.

5. Additional tourists will come to downtown
6. Bringing more people from outside of Snoqualmie an making it a destination will help raise the popularity of other businesses as well as sales tax revenue.
7. This development will bring much needed tourist to stay. The river walk would be developed and bring foot traffic. Puts us on the map.
8. It will bring in more people and revenue from outside of the valley

** Question 4:

1. This would attract too many people and create opportunities for noise, intoxication, and other unpleasant things.
2. It will create increased traffic, to an area that's already congested. May deter residents of Fall City coming to Snoqualmie along 202 because of the traffic. Increased noise pollution.
3. Explained in prior comments
4. My assumption from prior City Council meetings is that it was nixed.
5. Same as above
6. People will stay the night and explore.
7. It will bring in more revenue for our city

--

Dave Eiffert, President
PO Box 686
Snoqualmie, WA 98065
425-894-7970

Letter No. 61

Mark Hofman

From: Amanda Rich <amandaorich@gmail.com>
Sent: Tuesday, May 19, 2020 8:14 PM
To: Mark Hofman
Subject: Public comment on proposed Mill Site development

Categories: Green category

RECEIVED
MAY 19 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I am a resident of Snoqualmie and a home owner (8346 Silva Ave SE) and have lived in the Snoqualmie Valley for 12 years. I am opposed to proposed development of the Mill Site.

Our small town cannot support the proposed development.

First, the location has significant historical value, which would be spoiled by this development. It would also further degrade the charm of our rural valley community, which is why people love to visit here and spend money in our historic downtown.

Further, the area cannot support the proposal as it stands in terms of the impact on the roads, recreation and wildlife. 61-1

That Mill Site is not an area suited for that kind of development. I'm not opposed to development - I simply believe that the real impacts need to be considered and that has not happened in this case. The existing residents need to be considered and that has not happened here - the traffic alone is going to change the daily lives of all residents of the surrounding communities.

With respect,
Amanda Rich

--
Amanda Rich
M.Ed., Education Policy
amandaorich@gmail.com
Mobile 206-898-7542

Co-Chapter Advisor - Alpha Chi Omega, Rho Chapter, Univ. of Washington

Letter No. 62

Mark Hofman

From: monica lowney <monicalowney14@yahoo.com>

Sent: Wednesday, May 20, 2020 12:13 AM
To: 'james.szubski@gmail.com'; 'hillhousehome@gmail.com'; 'rmccann77@hotmail.com'; 'suzy_berger@yahoo.com'; 'maryjoe4813@gmail.com'; 'ergreenhaw@gmail.com'; 'elaine.arm39@gmail.com'; 'xelmyck@centurytel.net'; 'rick.grant@quantumwindows.com'; 'mattb@snoqualmietribe.us'; 'swheatley18@gmail.com'; 'robthegman@gmail.com'; 'howlin2@gmail.com'; 'laurat@svsvet.com'; 'susan.ranney@gmail.com'; 'storrsjane@gmail.com'; 'mark.d.emory@comcast.net'; 'darcylwilson@outlook.com'; 'ampe461@ECY.WA.GOV'; 'ramin.pazooki@wsdot.wa.gov'; 'lilberkey21@gmail.com'; 'sjedmunds@me.com'; 'williamson_steel@yahoo.com'; 'irey50@msn.com'; Carolyn Simpson; 'dbn547@comcast.net'; 'lesleydsheppard@gmail.com'; 'wdmomwood@aol.com'; 'formerparent@outlook.com'; 'caseyhanderson@yahoo.com'; 'ngtyqt@yahoo.com'; 'michael.ross@snoqualmie.org'; 'richard@rkscheel.net'; 'peggyshepard@comcast.net'; Fuzzy Fletcher; 'teresa@avocetconsulting.com'; 'shawnhamerly@hotmail.com'; 'c-bray@outlook.com'; 'sarahkaster@gmail.com'; 'erin@svpa.us'; 'greg@gregorykipp.com'; 'mikandjanelle@gmail.com'; 'erin@svwid.com'; Gwyn Berry

RECEIVED
MAY 20 2020
City of Snoqualmie
Community Development Department

Cc: Mark Hofman; Jason Rogers; dana.hubanks; Dana H.; Cris Coffing; Julie Lake
Subject: Re: Invitation of Public Comment on the Mill Site Draft Environmental Impact Statement

Categories: Green category

WARNING: The sender of this email could not be validated and may not match the person in the **"From"** field.

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Gwyn,

I am curious how you developed this list for distribution regarding the Mill Site DEIS? The DEIS lists names of individuals as "interested parties" in Section 6.2. I am noticing Christy Coffing, Julie Lake and Dana Hubanks are not on your email list. I am certain they participated in the May 2017 scoping meeting regarding the Mill Site and submitted written and/or oral comments. Please add them to your email list. I will add them on this email so they are informed they were not included on this city email list. Can there be others that have been missed? I would encourage anyone who does not see a fellow citizen that attended the May 2017 scoping meeting to inform the citizen and the city of there absence on the cities email list. Thank you for your help and written explanation of how this list was composed. 62-1

Sincerely,

Monica Lowney

On Thursday, May 14, 2020, 02:00:30 PM PDT, Gwyn Berry <gberry@snoqualmiewa.gov> wrote:

May 20, 4pm is a public meeting and the purpose of this new emailing and information today is to distribute the instructions wider on how to participate remotely to give oral public comment on the DEIS. The primary purpose of the public meeting is to take oral public comment on the DEIS.

Thank you,

Gwyn Berry

Planning Technician

PO Box 987

Snoqualmie, WA 98065

Phone 425-888-5337 ext. 1131 | Fax 425-831-6041

www.ci.snoqualmie.wa.us

Letter No. 63

Mark Hofman

From: Julie Lake <juliehlake@gmail.com>
Sent: Wednesday, May 20, 2020 10:33 AM
To: Mark Hofman
Cc: Bob Sterbank; kcexec@kingcounty.gov; Nancy.Krier@atg.wa.gov; Council Members; laura.watson@ecy.wa.gov; tyson.oreiro@ecy.wa.gov; heather.bartlett@ecy.wa.gov; thomas.buroker@ecy.wa.gov; jmoy@jacl.org; clarouche@jacl.org; sbaker@jacl.org; kareny@jcccw.org; dinouye@jacl.org; info@preservewa.org; jennifer.meisner@kingcounty.gov; philippe.letourneau@kingcounty.gov; Valley Record; editor@thestranger.com; dgilbert@seattletimes.com; jbrunner@seattletimes.com; record@kuow.org

RECEIVED
MAY 20 2020
City of Snoqualmie
Community Development Department

Subject: Re: Public Hearing Request

Categories: Green category

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Mr. Hofman,

Your reply and justification to my request, below, are unsuitable to the issue at hand. The one-hour call-in meeting for citizen comments scheduled for 4 PM today is insufficient.

Trying to rush this citizen review of a 2900+ page DEIS, in the midst of a global pandemic shutdown, for a huge site which has been documented as harboring a significant amount of dangerous toxins and contaminants, as well as Japanese cultural artifacts, and is a wildlife habitat wherein reside our City's cherished Bald Eagles, Osprey, and numerous other species, is inappropriate, and the timing appears to be opportunistic, and even underhanded. 63-1

The City of Snoqualmie has had possession of the Snoqualmie Mill PCI proposal DEIS for about a year (and never did release it in response to Public Records Requests from two citizens about a year ago), and you are well aware that this can all wait until a more appropriate time.

The City of Snoqualmie has a reputation for disregarding citizen objections and concerns, but the very least the City could do in this instance is to delay the approval of this DEIS, to give citizens, and those in adjacent areas and any stakeholders downstream from Snoqualmie, who could be directly affected by this proposal, time to review the DEIS and proposal, and the opportunity to voice their concerns in an in-person Public Hearing.

One of my concerns about this proposal is that it appears that some, or all, of the parcels at the Mill Site have been rezoned. The historic Japanese Community resided on parcel number 302408-9004, and I noticed that it has apparently been rezoned from Open Space 2 to Single Family. This is the parcel that was understood to be protected from development, and possibly made into a memorial to honor the Japanese Community, who were incarcerated by Executive Order 9066, in February of 1942. 63-2

Before they left, they dumped all of their Japanese belongings into their outhouses. See Archaeological Inventory Form in Appendix E, "Cultural Resources Assessment, in the DEIS; artifacts were found, photographed, and reburied:

https://www.snoqualmiewa.gov/DocumentCenter/View/30871/Mill-Draft-EIS-Appendix-E_Cultural-Resources-2020-04-23-PDF

I'd like to remind you of the July 7, 2017 National Japanese American Citizens League Emergency Resolution:

https://jacl.org/wordpress/wp-content/uploads/2017/02/ER-2_as_adopted.pdf

Of course, this is not only about the "Japanese Parcel". Mill Site Parcel numbers 292408-9002, 292408-9009, 292408-9006, and 292408-9023 have seemingly been rezoned from what I believe was Light Industrial, to Heavy Industrial. 63-2

Parcel numbers 302408-9001, 302408-9069, and 302408-9070 are Industrial, and parcel number 292408-9022 is Light Industrial. I don't recall that any of it was zoned Heavy Industrial in the past. In other words, the zoning classifications on the City of Snoqualmie Zoning Map do not agree with the King County Parcel Viewer's classifications. I do not know when, and by what method, they were rezoned.

Please consider this message as one of my comments on the Mill Site proposal DEIS. I will write to you about this again.

For non-City of Snoqualmie entities who have been copied on this, the link to the proposal, including the DEIS in question, is at the City website: https://www.snoqualmiewa.gov/393/Mill-Property

The aspiring developers' proposal is here: http://snoqualmiemill.com/site-plan/

Regards,

~Julie Lake

On Wed, May 13, 2020 at 4:03 PM Mark Hofman <MHofman@snoqualmiewa.gov> wrote:

Ms. Lake,

Thank you for your interest in the Snoqualmie Mill Ventures Planned Commercial / Industrial Plan (PCI Plan) proposal.

You have requested that a public hearing be held pursuant to WAC 197-11-535 on the Draft Environmental Impact Statement (DEIS) for the PCI Plan. A public hearing is not required. Instead, an optional public meeting is scheduled for next Wednesday, May 20, 2020 at 4 p.m. Please refer to the project page on the City website under the Community Development Department tab this week for more details (https://www.snoqualmiewa.gov/393/Mill-Site-Property).

Letter No.64

Mark Hofman

From: Julie Lake <juliehlake@gmail.com>
Sent: Wednesday, May 20, 2020 11:33 AM
To: Mark Hofman
Cc: Bob Sterbank; kcexec@kingcounty.gov; Nancy.Krier@atg.wa.gov; laura.watson@ecy.wa.gov; tyson.oreiro@ecy.wa.gov; heather.bartlett@ecy.wa.gov; thomas.buroker@ecy.wa.gov; jmoy@jacl.org; clarouche@jacl.org; sbaker@jacl.org; kareny@jcccw.org; dinouye@jacl.org; info@preservewa.org; jennifer.meisner@kingcounty.gov; philippe.letourneau@kingcounty.gov; Valley Record; editor@thestranger.com; dgilbert@seattletimes.com; jbrunner@seattletimes.com; record@kuow.org

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MAY 20 2020
City of Snoqualmie
Community Development Department

Subject: Re: Public Hearing Request

Categories: Green category

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Thank you Mark,

The differing zoning designations to which I referred were taken from the King County Parcel Viewer. If the "Japanese Parcel" is still zoned Open Space 2, I don't understand why construction would be referred to there, and of course I reviewed the Cultural Resources part of the DEIS, including the Appendix. 64-1

I am also very concerned that the King County Parcel viewer designates some of the parcels as "Heavy Industrial". As I noted, some of the designations do not line up with the City Zoning Map. 64-2

~Julie Lake

On Wed, May 20, 2020 at 10:49 AM Mark Hofman <MHofman@snoqualmiewa.gov> wrote:

Thank you, Julie,

Thank you for your comment on the Draft Environmental Impact Statement (DEIS) for the Mill PCI Plan. This email response is to confirm receipt of your comment.

All comments will be collected at the expiration of the published agency and public review and comment period identified in the Notice of Availability. Responses to comments will be prepared for inclusion in the Final Environmental Impact Statement (FEIS). I encourage you to review the cultural resources portion of the DEIS which addresses several of your concerns; no portion of the site was rezoned to single family residential. The zoning of the redevelopment project site is Planned Commercial-Industrial (PCI) as shown on the adopted Official Zoning Map of the City of Snoqualmie. Proposed land uses for redevelopment of the brownfield site are contained in the PCI Plan under review, and analysed in the DEIS. All materials are available on the City project webpage under the Community Development Department tab.

Letter No.65

Mark Hofman

From: Jill Brandenburg <jillbrandenburg@comcast.net>
Sent: Wednesday, May 20, 2020 12:06 PM
To: Shared Mill Site EIS
Subject: Comments on Millsite Environmental Impact Statement and future city actions pertaining to development of site

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City of Snoqualmie
Community Development Department

Categories: Green category

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1. Those persons who are affected by this proposed development, yet not able to comment due to not technically being within the Snoqualmie limits should have their voices heard. 65-1

2. The city needs to spend time solving its existing issues of financial accountability, transparency & trust before entering into a huge new development project. 65-2

Letter No.66

Mark Hofman

From: Lesley Sheppard <lesleydsheppard@gmail.com>
Sent: Wednesday, May 20, 2020 4:18 PM
To: Mark Hofman
Subject: Fwd: Mill Site DEIS comments for public record

Categories: Green category

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MAY 20 2020
City of Snoqualmie
Community Development Department

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---------- Forwarded message ---------
From: **Lesley Sheppard** <lesleydsheppard@gmail.com>
Date: Wed, May 20, 2020 at 3:51 PM
Subject: Mill Site DEIS comments for public record
To: Peggy Shepard <Pshepard@ci.snoqualmie.wa.us>, <SSundwall@ci.snoqualmie.wa.us>, Matt Larson <MLarson@ci.snoqualmie.wa.us>, <jmayhew@ci.snoqualmie.wa.us>, Jodi Warren <jwarren@ci.snoqualmie.wa.us>, Bob Jeans <bjeans@ci.snoqualmie.wa.us>, <kross@ci.snoqualmie.wa.us>, <mlaase@ci.snoqualmie.wa.us>

Council Members,

Reading through a 3,000 page environmental report while trying to homeschool 4 kids and work has not been an easy task.

I hope you all have managed to do a close read and will raise some of the same concerns I have found in the report. Please address at the 5/20/20 the following concerns with the Mill Site DEIS.

1. How can this property even be considered when it is on/partially on a flood plain, especially when the property is contaminated?
2. Are brownsfield development laws and codes being followed?
3. Where are the potential impacts to traffic, our roads, our bridges and neighboring properties considered in the report?
4. Impacts to our schools and emergency services are not adequately address in this report. Why not?
5. Later phases of the project's impacts are not considered. Will they require a separate EIS or a SEPA review?
6. Why is the Mill Pond not considered in this report?
7. I do not see any tie in with the Shoreline Management Plan and its regulations. Why not?

66-1

I appreciate your thorough consideration of these concerns

Lesley Sheppard
7516 Snowberry Ave SE
Snoqualmie, WA 98065

Letter No. 67

Mark Hofman

From: Alison jane Uno <alisonjuno@gmail.com>
Sent: Wednesday, May 20, 2020 5:14 PM
To: Mark Hofman; Shared Mill Site EIS
Subject: Comments on the PCI Plan DEIS

Categories: Green category

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MAY 20 2020
City of Snoqualmie
Community Development Department

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Dear Mr. Hoffman,

Please accept my comments on the PCI Plan DEIS.

Firstly, the public comment period for the DEIS is too short given the volume of material to be reviewed and the current pandemic. I respectfully request a 1-2 month extension. It took 3 years to create the DEIS, we should have more than 45 days to review it.

According to the DEIS, this Draft EIS address concerns associated with Phase 1 of overall project development, with subsequent supplemental analysis and reporting expected for subsequent phases of development. Please ensure that the public, relevant agencies and decision-makers, tribes, and other stakeholders are given fair and equal opportunities to review and comment on these later SEISs, supplemental analysis, data, and reports as this initial DEIS. 67-1

The DEIS does not include adequate figures and maps. It has been extremely difficult to review the various resource affected environment and impact analyses without maps to visualize the different areas and effects. Please include clear and concise maps for each resource studied for each alternative in the next iteration of the EIS. 67-2

The analysis of potential effects to Borst Lake is inadequate. Borst Lake is in very close proximity to the Project location, is a local natural environmental resource that requires additional evaluation in the DEIS. Development at the project site in Phase 3 would bring thousands of people in close contact with this polluted resource which could have detrimental effects to people, and to its resident fish and wildlife. The Draft EIS should analyze in greater detail the fish and wildlife species present at Borst Lake (in a non-invasive manner such as through the use of drones to gather data), and should take into consideration additional measures to restrict access to the resource. Additional site surveys in different times if the year would give a more complete picture of the species and uses of Borst Lake and would provide an adequate baseline on which to assess effects. 67-3

The DEIS (Appendix C, p.16) states that "Bull trout critical habitat was designated by the USFWS on September 26, 2005. Under the ESA listing, the USFWS assumes that bull trout are present in suitable habitat in King County waters unless proven otherwise. However, extensive instream surveys for bull trout have failed to detect its presence anywhere in the three forks of the Snoqualmie River above the falls (Berge and Mavros 2001). Therefore, it is our assessment that critical habitat for bull trout is not found within the project vicinity." When conducting site investigations and surveys, the absence of a species is not confirmation that it does not exist. This is common knowledge for wildlife researchers. Furthermore, the study cited is from 2001 which is 19 years old. There could well be populations of Bull trout in the Snoqualmie Rivers and tributaries and connected waterways nowadays. In addition, *the USFWS assumes that bull trout are present in suitable habitat in King County waters unless proven otherwise*. Considering the potential for impacts to waterways under the 2 action alternatives, additional site sampling efforts combined with outreach to the local fishing community should be undertaken to determine actual bull trout presence in Snoqualmie Rivers and Borst Lake in 2020. 67-4

The DEIS mentions elk use of areas within the Project site. As a local resident residing in the neighborhood to the north of the site, I have witnessed elk crossing the Project area from north to south on countless occasions. Similarly, I have seen bears on multiple occasions crossing north-south through the site as observed from the roadway (SE 70th Drive), and also 1 fisher. Cougars have been sighted in the Tokul neighborhood . The EIS should consider wildlife corridor impacts in the area, including those for elk, bear and cougar. The EIS should also consider potential pubic and wildlife safety effects from bear and cougar interactions with people, which doesn't automatically result in termination of an animal. Proper litter control and other measures to protect these important animals should be taken into consideration in future development plans for the site. 67-5

The old abandoned buildings likely include some prime habitat for some wildlife species including owls and bats, many of which are on the decline in the US generally. These old buildings on site should be assessed for wildlife inhabitants, and mitigation should be developed to prevent impacts to these important species, even though these may not be state or federally-listed, such as timing of construction and provision of alternative habitats.

The DEIS (Appendix C, p.41) states "on-site wetland buffer functions will be provided at a higher level than if the standard wetlands buffers were applied *and the wetlands will be well protected*." How, exactly will the wetlands be protected? The Project area extends well into the northern boundary of Borst Lake and would bring people in close contract with this resource. Please consider access restrictions for portions of the proposed restored wetlands that are undergoing active restoration and perhaps provide educational signage so that people understand why these areas must be excluded. Please also include in revisions to the DEIS, a wetland restoration plan that includes monitoring and adaptive management of restored areas with set goals for achievement. For example, a requirement that 80% of plantings are successful, with plans to continue restoration planting and invasive species management until this achieved. 67-6

The DEIS states that Future development of Planning Area 3 will set aside almost 70 acres in the central area of the site to function as a conservation corridor devoted to passive open space, wildlife habitat, wetland mitigation and compensatory flood storage. These multiple uses are not the same and some are incompatible. For example, passive open space may be used by future residents with associated disturbance to wildlife, which is inconsistent with preserving wildlife habitat. Flood storage and wetlands can be markedly different depending on what type of water is being stored – that from impervious surfaces (which would contain associated pollution) or natural areas. The EIS should consider these differences in use and plan for some areas within this 70 acres to be off limits to people, and/or create alternative areas for wildlife habitat in other areas of the site. 67-7

An increase in impervious surfaces would contribute to increased pollution runoff from stormwater and reduced lag time for heavy rainfall. The EIS should consider the use of pervious surfaces for as much of the site as possible – such as pedestrian streets/sidewalks. 67-8

Invasive species are a large problem in this area. In the event that regulated on-site wetland/wildlife habitat requirements cannot be fulfilled on the Project site, please consider enhancing areas close by in collaboration with land owners and regulatory agencies (e.g., King County, USACE), so that the overall area is improved. This could also act as mitigation for impacts to large game pathways that could be affected with fencing and exclusion zones. 67-9

The increased number of jobs associated with the PCI Plan Alternative (would provide approximately 45% more jobs than the Redevelopment Alternative according to the DEIS), should be a significant deciding factor for decision-makers in choosing the best alternative. This is particularly important in light of the recent loss of jobs due to the CoronaVirus, which could last for many years. 67-10

Development of the Project site would cause both temporary and long-term effects to the surrounding neighborhood, including a substantial increase in traffic and noise. Roads that would be used to access the site are also used to access the regionally important railway-trail system that occurs close to (and originally crossed close to or within) the Project site. An increase in traffic, particularly construction- and delivery-related traffic including large trucks and equipment, would significantly increase the danger to road users, particularly those on bicycle that access the trail system. 67-11

Mitigation for these effects could involve connection of this trail system on the Project site (in collaboration with King County if needed). This trail system links many thousands of miles of biking and hiking trails throughout the region and is becoming more and more important as we increase our leisure and outdoor time an become less reliant on automobiles. A monetary contribution could be given to King County to improve the trail system in the event that it lies outside of the Project boundary. Connecting this important trail system would allow bikers, including children, off the roads and away from Project-related traffic for the long-term and would show good faith to the local community. Connecting this trail system through the site would also allow for less cars using the roads to access the site since many visitors could access the development from the trails – including visitors from nearby Fall City, North Bend, and beyond. I believe that this trail system (at the west end) connects as far as Seattle. Taking a bike ride from a nearby city to the proposed winery-themed or outdoor recreation development through the trail system could become an extremely popular pastime and well-worth serious consideration for inclusion in the development. A bike/walking trail link from the Falls to the Project site may also attract visitors that do not use cars and would reduce traffic effects. 67-11

The proposed outdoor Amphitheatre associated with the Redevelopment Alternative would increase noise disturbance at key quiet times for a large area of Snoqualmie town and parts of unincorporated King County. The neighborhood to the north of the site (Tokul Road, 53rd Ave, etc.) is periodically affected by unwanted noise from outdoor concerts at the Snoqualmie Casino and events at Dirtfish. The city has also recently granted a TUP to a wedding venue in this neighborhood which will increase unwanted noise at key times – weekend evenings – when people are outside with friends enjoying a meal. Much of this noise occurs on summer weekend evenings when our neighbors are winding down and trying to enjoy our peaceful rural way of life; that is one of the reasons we chose to live out here. Adding an outdoor music venue so close by would significantly increase noise disturbance, which is unacceptable. Indeed, due to the geography of the site, outdoor music concerts would be heard throughout the entire town, which is quite fed up with unwanted music concerts as it is. If the Redevelopment Alternative is developed further, a more in-depth noise analysis is required to fully understand the effects of the proposal before a decision can be made that would affect the local community for years to come. 67-12

In addition to noise, an increase in traffic from a concert event would have significant effects to the local roads and hundreds of cars enter or leave at the same time, adding congestion and wear and tear to our rural roads, and delays for residents. The Snoqualmie Falls is a very popular tourist attraction that causes traffic congestion on popular weekends that often requires a police traffic safety officer to direct traffic. The increase in traffic from hundreds of cars entering or leaving the site from a concert would cumulatively add and unacceptable traffic congestion burden on both residents and visitors, which could impact visitor use of the Falls, and would also become a larger safety issue. A local example of these effects is the use of Mountain Meadows (in nearby North Bend) for summer picnics. The roads that lead to Mountain Meadows were congested for many hours during these summer picnics which severely and significantly impacted local residents. Decision-makers should consider these significant cumulative traffic effects in the development of subsequent SEPA documentation, and if they cannot be mitigated, the proposal should be revised to remove the concert venue. 67-13

The rural roads that would be used to access the proposed Project site are in serious disrepair, with large potholes appearing on a regular basis that are not repaired or are repaired poorly so that the potholes reappear shortly afterwards. Current drivers and bikers often swerve into the shoulder or the opposite lane in order to avoid these large potholes. Adding traffic to these roads under both action alternatives would exacerbate the poor state of these rural roads and constitutes a significant public safety issue. The EIS should consider the repair and upkeep on these existing roads as part of the analysis, and require mitigation to reduce such effects to non-significant levels. In the event that an outdoor or indoor music concert venue is developed, mitigation in the form of a regular payment to the city/WSDOT should be granted to pay for the increased cost of wear and tear on our roads from such increased use. 67-14

The main road that would be used to access the site frequently floods. The EIS should identify emergency egress locations in the event of flooding, along with associated effects of using these alternative roads. 67-15

DEIS (P.1-34) states "Traffic and congestion on area roadways will unavoidably increase as a result of the proposed PCI Plan and background growth. With implementation of currently programmed road improvements and additional improvements recommended for the proposal, however, all study intersections would operate at satisfactory levels of service, consistent with adopted City standards." The evidence of this conclusion is absent. The traffic count data included in Appendix F appears to include only 4 days of data, at peak times and not on weekends, which creates an insufficient baseline data on which to assess potential effects. Furthermore, the Meadowbrook Way/Park Street intersection survey was conducted from 8-9pm on February 8 – which is after high school classes have started and therefore would not capture the majority of the traffic using this intersection. The EIS should include additional traffic analysis including traffic counts at appropriate times to obtain traffic data that includes peak hours or the day and peak time so the year – including sunny summer weekends – the times at which impacts would be most apparent with an alternative that includes a concert venue. 67-16

The DEIS is inadequate in evaluating electric power. This neighborhood experiences multiple power outages every year, mostly in the winter months, that can last from an hour to many days. The EIS should include analysis of power outages and potential consequences of outages on the types of businesses and operations that would occur on site, some of which could be safety hazards. For example, in the event that hazardous materials or equipment is being used/transported on site and an outage occurs, ensure that automatic shut off valves and back up power generators are in place to prevent an emergency. It is not adequate to simply state that tenants must have their own a Spill Response and Emergency Response Plans; this should be something that is inherent in future design of the site, and should be included n the EIS. The EIS should discuss these potential hazardous situations and discuss the measures that would be put in place to address them. This also applies in the event of an earthquake; the Project site is on unstable ground and could liquify in portions of the site, particularly those in wetland areas. The EIS should be revised to discuss emergency response procedures that are well developed and conduct response exercises at the site so that all are prepared in the event of an emergency. 67-17

There are already areas in Snoqualmie and North Bend that have been developed for retail and restaurant us that lay empty – such as the shopping area near I-90 in North Bend, and on Snoqualmie Ridge (e.g., the old IGA building that now lays empty). Where is the evidence that this development would be successful in attracting businesses? The EIS should study the viability for attracting such businesses over the long term. Furthermore, in todays business climate, a mix of uses would seem most pertinent. All over the country, shopping malls lay empty and unused. The use of mixed retail, residential and industrial may be a better approach to ensuring that this development would not sit empty. The EIS should consider the use of buildings that can be used for multiple tenants, such as through large barn doors that can open and close various sections of buildings to provide more flexibility for attracting tenants. 67-18

Thank you for considering these comments. I anticipate your responses to each and every one in the Final EIS.

Kind regards

Alison Uno

Letter No. 68

Mark Hofman

From: Mary and Joe <maryjoe4813@gmail.com>
Sent: Wednesday, May 20, 2020 5:52 PM
To: Mark Hofman
Subject: Mill Site comments
Attachments: Mill Site DEIS comments .odt

Categories: Green category

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MAY 20 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi, Mark,

Please find Mill Site DEIS comments attached. If the comment period is extended, I will perhaps submit additional comments. Hope all is going well for you!

Mary Norton

May 20, 2020
41502 SE Reinig Rd.,
Snoqualmie, WA 98065

Mark Hofman
City of Snoqualmie

Hi, Mark,

re: Mill Site DEIS

Thank you for the opportunity to comment on this DEIS. We live on Reinig Road east of the Mill Site and are affected by most decisions made by the City of Snoqualmie..

I have a number of concerns about the DEIS. There are inconsistencies in the document, for example, is there a planned outdoor amphitheater or not? Much of the document discusses an amphitheater, yet in multiple places it is stated it is no longer part of the project. 68-1

I'm surprised that this proponent has calculated the area of their building flowerbeds and parking strip plantings, added them up and counted them as Open Space acreage! Do building flowerbeds and parking lot planting strips meet the definition of RCW 84:34? 68-2

A number of maps are confusing, or seem out of context.

- p. 3-58 and 3. 3-82 seem to have no legends.
- p. 3-98—it's difficult to tell what is intended to be shown.
- p. 3-170 –no orientation shown, nor is the Mill Site itself indicated.
- Fig 3-13.5: missing trail links barely discernible; no trail connection to Snoqualmie Valley Trail shown on the northwest end of the project; some of the "park areas" shown are actual apparently wetlands.
- p. 3-357 Snoqualmie Valley Trail: too conceptual to be useful; need to show trail context, both end connections, and trails it needs to connect to, including Centennial, Riverwalk and Snoqualmie Falls.

68-3

There seems to be conflict with a number of Comprehensive Plan policies in the planned project.

- **3.2.1: " . . .provide area to . . .improve the local job/housing balance.** The planned rental units in this proposal will be market rate apartments, $1,600–2,400/month. The jobs associated with the first phase of development include retail, restaurant and warehouse jobs, (low to moderate income jobs in Snoqualmie). Middle income (80–120% of the area median income) is needed to rent one of these apartments. Three low-income people could afford a one-bedroom, or five people could afford a 2 bedroom unit. By phase three of the development, there may be technical and office jobs that pay a median/middle income wage. Will they want a 12 year old apartment over a warehouse? This proposal will further exacerbate the City's present affordable housing shortage, create a need for other housing elsewhere, and increase commuter traffic.

68-4

- **3.3.4: Apply zoning controls that limit uses with . . . lower wage jobs . . .particularly in the Snoqualmie Hills and Mill Planning Areas, including uses such as warehouses/distribution . . .** Phase one will be essentially warehouses, retail and food oriented businesses that pay less than the warehouse wage.

- **4.2.1: Encourage innovative housing that helps promote City goals of affordability . . .** these rental units, above warehouses and businesses, will be affordable only to middle income earners, who are unlikely to live on-site.

- **Community Character E9: Encourage assessment of the Mill Pond Waters and development of public access as appropriate.** "The Mill Pond is not owned or controlled by the applicant . . . Any additional investigation or development would be the responsibility of th property owner." Perhaps-- however, since the applicant intends to discharge stormwater and run-off from the development into the Mill Pond, a Shoreline of the State, this should trigger a baseline analysis of the Mill Pond/Borst Lake.

- **6.5: Public health and property damage risk associated with flood and geologic hazard areas (are) reduced . . .** Most of the Mill Site is in the flood plain, and some in the flood way. Even if no net rise is achieved, it's not a good plan to build in the flood plain, and property damage risk is exacerbated when buildings, roads and infrastructure is built in the flood way.

- **7.4.1: Maintain land use designations and zoning to allow . . . housing types that match the jobs in the City and make it possible for people to live and work in Snoqualmie.** Low wage jobs and market rate apartments make it necessary for people to live elsewhere and commute into Snoqualmie, as many people presently do. This project will exacerbate that imbalance. 68-4

- **p. 3-178: regarding multimodal transportation systems:** the applicant notes that the "regional trail" (Snoqualmie Valley Trail) is a bicycle/pedestrian trail. It is bicycle, pedestrian/equestrian.

- **8.1.3: Ensure transportation improvements or strategies accommodate development impacts concurrent with that development, and prohibit development if it causes LOS's for transportation facilities to decline below adopted standards.**

9.1.2: Require the provision of essential capital facilities and services to meet adopted LOS standards and accommodate growth concurrent with development.

9.1.3: Require future development to bear a fair share of costs for planned capital improvements concurrent with development, to achieve and maintain the adopted LOS. Per the DEIS, LOS level will mostly remain acceptable (D or above) IF five new round-abouts are constructed, the 202 bridge is replaced by a 4-lane bridge, two lanes are added to 202 at the Parkway, the present Tokul roundabout is doubled to 2 lanes instead of one, and multiple other Parkway intersections are "reconfigured" or signaled. None of these improvements are presently funded.

- **The DEIS varies in how these might be funded:** p. 430: "the developer would construct these". p. 435: " . . . the developer is paying for almost all new infrastructure costs."

p. 430: "Public roads, including a possible new or reconstructed bridge(s) would be the responsibility of the City"

p. 3-179: tax revenue generated by the project will be used to fund ("more than sufficient") part of the developers share of transportation capital projects. How can revenue from a finished development achieve concurrency? Who is going to pay for all these projects?

- **8.4.1: . . .require new development to provide pedestrian and bicycle pathways that connect . . .**The DEIS mentions internal pedestrian trails on the proposed project; these should be pedestrian/bicycle, and should be at least 8'wide, ideally 12'.

- **AIP: Preserve flood storage and conveyance functions of the floodway.** Assuming compensatory storage meets flood storage requirements, the project still sites a new roundabout, a parking area, and part of a building in the floodway. This seems unwise, and conveyance functions are not explored in the DEIS. 68-4

I'm particularly concerned about transportation because of experiences on SR202 in the wine and warehouse district of Woodinville. My daughter has a 9 mile commute through this area. Despite 3 new roundabouts, her commute time is 50–60 minutes. (She can bicycle an alternate 12 mile route in 45 minutes.) When there is a concert event at San Michelle winery, despite shuttles, policemen directing traffic, etc, traffic is at a stand-still. Sometimes we turn off our engine while waiting.

The DEIS analyzes Snoqualmie traffic in great detail, but the baseline data was collected apparently in January several years ago. Summer/tourist season traffic in the valley is much higher volume than fall/winter. A sample count on our road (Reinig road) yesterday during "peak commute hour" 4–5 pm yielded 10 % higher vehicle count than the DEIS indicates, and my count was done during the COVID work-at-home quarantine, on a cloudy day with minimal recreational traffic. I would estimate traffic on our road triples on a sunny day due to river access. How accurate, then, is the other traffic data, and when was it taken? The analysis also states that the predicted LOS's don't include any amphitheater traffic; even the stated need for 5 roundabouts, a new bridge, new turn lanes, signals and a widened Tokul roundabout is unlikely to be realistic or sufficient. What about when amphitheater traffic is added? The Mill Site is poorly placed transportation-wise, on the wrong side of the valley for this type of intense traffic-oriented development; **traffic impacts will be felt by everyone in the City.** 68-5

The noise analysis is also a concern, particularly if there is an amphitheater. p. 3.325 and p. 3.338 conclude that sound from a rock band and loudspeaker at any of the monitored sites would be analogous to a "quiet residential neighborhood" or a "conversation at 3 feet." This is difficult to believe, considering every outdoor concert at the Casino is very audible across the valley, as are concerts at Mountain Meadows. How would the Mill Site concerts compare to those at the Casino? Have those been measured on the north/opposite side of the valley? Further, experience with public venues such as the Mountain Meadow, and San Michelle Winery concerts make me think it's unlikely concerts would be 7–11 on weekend evenings. Typically bands play much of the day, and into the evening. Snoqualmie already has a public amphitheater with stage, and should utilize that, prior to building a new private one in a difficult traffic location. 68-6

The DEIS analyzes the view of the development from a number of locations but fails to tell what the rectangles showing the project actually represent. The DEIS states that the city has a height limit of 40 feet, but that the proponent expects variances for "imaginative design" to enable 4-5 story buildings, with roof peaks up to 70'. Do the rectangles representing the project show 40' buildings as permitted, or 70' buildings? 68-7

While the Snoqualmie River is discussed, and fish and wildlife surveyed, no attention is given to Borst Lake, also a water discharge site for the project. The Snoqualmie Comp Plan considers it a Class I wetland; it is a Shoreline of the State. The DEIS rates it a Class I/II wetland, with only a 22 habitat value. This is a significant wetland, and should be inventoried and surveyed, if project water is to be discharged into it, no matter who owns it. It's marsh areas are amazingly rich habitat, and the secret 68-8

marshy lake in the center of the island is magical. It is a City asset and should be recognized and treated as such. 68-8

Wetland buffer averaging is a significant feature of the PCI project. While some wetlands require 225' buffers, 165' seems the width commonly used in the DEIS. These are "averaged" in some cases to 16' and 25'. Are widths this small protective? If it is not known how many of the wetlands relate to each other, especially in planning areas 2 and 3, how can buffer widths be arbitrarily reduced this far, and wetland hydrologic functions be determined? 68-9

p. 3-116. Is the Snoqualmie River truly exempt from water quality control?

The DEIS details impacts to fire and police services, enumerating calls to homes and businesses. It doesn't discuss emergency management services in case of floods, where, for the first time, Snoqualmie will have significant businesses, infrastructure and homes across the river from fire and police services. While the 205 project has hopefully lessened flood impacts in the city, I remember the city evacuating people by boats in 1990 and 1995/6, which were not 100 year events. However, this was done in the more slack water of downtown, away from the river itself, not in the fast floodway, and not across the main channel from any services. These people will be on their own in a major flood event, and likely marooned for the duration in many minor ones. Even minor floods cover much of Mill Pond Road, and flood impact on emergency services to these future Snoqualmie residents is not addressed in the DEIS. 68-10

Similarly, maintenance/recovery after flood events of new roads, parks, trails and landscaped areas in the floodway are not addressed in the DEIS, but will be events the city will deal with multiple times each winter. 68-11

Water conveyance in the floodway, particularly where a building is sited in the floodway, are not addressed in the DEIS. 68-12

Snoqualmie has made an effort to revitalize the historic downtown, with street improvements, signage, and pedestrian improvements. Creating a new, 4th business district, particularly a tourist-oriented one, will affect the other business districts. How will this affect the historic downtown businesses? How many places are tourists likely to stop in one day? The DEIS doesn't address this. 68-13

The DEIS mentions connections to the Riverwalk and Snoqualmie Valley trails, but treats these very conceptually. This will be Snoqualmie's main chance to actually, successfully make these trail connections, but they must be a priority in planning, at every level, particularly with the transportation plans. Getting workable trail connections across all those roundabouts and traffic will not be simple, but vital for a functioning system. This failed to happen during the Tokul roundabout construction, and pedestrian/bicycle traffic to the falls is hampered, as well as no City connection to a cross-state trail. The DIS makes no mention of the previous planned connection from the Tokul roundabout area to the Tokul/present western SVT termination, (planned as part of the Salish expansion/new housing) but this connection still needs to be made. The City needs to be connected to the SVT/Riverwalk at both ends of the Millsite, and it is critical that this is a priority during this project's planning. These trail connections need to move beyond conceptual or they will be lost as they were in the Tokul roundabout construction. 68-14

In general, most people concur that it's not a good idea to build in the flood plain or the floodway, or to make as much traffic as possible drive through as much of one's city as possible. We would all be 68-15

better served in the long term if this project were to be purchased for trails and open space and the DEIS should develop that scenario more fully. 68-15

Thank you for the opportunity to comment on this proposal.

Mary Norton

Letter No.69

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Wednesday, May 20, 2020 6:01 PM
To: Mark Hofman; Bob Sterbank
Subject: Comments to the Draft EIS

Categories: Green category

RECEIVED
MAY 20 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

The following is a written version of what I said at the May 20, 2020 meeting for oral comments on the DEIS for the Snoqualmie Mill proposal. The portions near the end were not able to be given orally due to the 3 minute time limit for each speaker.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065

I claim that the current SEPA process for this project is not being handling in accordance with law. I submit the following:

1. The EIS was not completed within the time period required by Snoqualmie Municipal Code. Section 19.04.080(C) of the Snoqualmie Municipal Code states "Environmental impact statements shall be completed within a period to be set by the responsible official not to exceed 180 days, unless the city and the proponent of the action agree in writing to a longer time." Mark Hofman, the SEPA Responsible Official for the City of Snoqualmie, stated to me in an email dated May 13 2020 "The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant-City agreement to an additional time extension." The Draft EIS for this project has taken approximately three years to create, which is far in excess of the 180 days mandated by the Municipal Code. 69-1

2. Publishing the Draft EIS during the declared State of Emergency is contrary to the Governor's Proclamation 20-28. Proclamation 20-28 (issued March 24 2020, with several extensions, the most recent of which is 20-28.3, dated May 12 2020), states "agencies are further prohibited from taking 'action,' as defined in RCW 42.30.020, unless those matters are necessary and routine matters or are matters necessary to respond to the COVID-19 outbreak". 69-2

   Washington State's Attorney General issued guidance to state and local agencies on March 26 2020 regarding how they should understand the meaning of "necessary and routine matters". The main guidance on whether something is "necessary" is to consider whether the action must be done at this time, or if it could wait until later. Since this Draft EIS took approximately three years to produce, I claim that is not **necessary** to have the public review and comment period during the state of emergency. It could wait until the state of emergency has ended.

The Attorney General's guidance on whether something is "routine" provides questions that an agency should ask itself when deciding that a matter should **not** be considered "routine". That questions are: "Is the reason for meeting on the matter unusual, special, and/or expected to be controversial and for which there will be a high public interest? Is this an exceptional or unique new project we want to launch? Is this an 'out of the ordinary' matter?" The public review and comment for the Draft EIS absolutely matches the public review and comment for the Draft EIS, in every single point that the Attorney General's questions ask. 69-2

Further, the Municipal Research and Services Center (MRSC) advises local governments "Consistent with the Attorney General's guidance, we suggest you limit agenda items to areas such as approving payroll and other vouchers, approval of minutes of previous meetings, and other matters that cannot wait until you can provide a physical location where the public can attend." The MRSC also advises that the Governor's proclamations "provide a legal basis for an agency to postpone or continue" land use matters.

Because of these two clear violations of state and local law, I call for the Draft EIS to be withdrawn by the city. To remedy the violation of the Governor's proclamation 20-28, the city might re-issue the Draft EIS after the state of emergency has ended. I am less clear on the correct remedy for the violation of the Municipal Code. 69-3

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Wednesday, May 20, 2020 6:14 PM
To: Mark Hofman; Bob Sterbank
Subject: RE: Comments to the Draft EIS

Categories: Green category

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MAY 20 2020
City of Snoqualmie
Community Development Department

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I would like to add the following references as part of my comments below:

1. The Governor's initial proclamation 20-28 (dated 3/24/20) contains the "necessary and routine matters" requirement. The initial proclamation is at: http://mrsc.org/getmedia/81ba5cd2-2db9-4f94-bd0b-287fea080f1f/w3p20-28opengov.aspx
    - For completeness, the Governor's proclamation updated 20-28.3, dated May 12, 2020, is at: https://www.governor.wa.gov/sites/default/files/20-28.3%20-%20COVID-19%20Open%20Govt%20Waivers%20Ext%20%28tmp%29.pdf

2. The initial guidance from the Washington State Attorney General was issued 3/6/20, before Proclamation 20-28. That guidance addressed general aspects of OPMA during the state of emergency. The first update to the Attorney General's guidance (there have now been 4 updates) contained information on how agencies should understand th "necessary and routine matters" requirement. That first update was issued 3/26/20, and can be found at: http://mrsc.org/getmedia/36a6b6cf-2ee8-469c-b600-0b6a8fa141f7/w3agcoronaopma2.pdf.aspx.
    - For completeness, the Attorney General's fourth updated guidance regarding the governor's proclamations, dated May 14, 2020, is at: http://mrsc.org/getmedia/0ddebf40-10d2-46af-9044-e9f237e69878/w3agcoronaopma4ud.aspx

3. The MRSC guidance that I quoted can be found at:
    - http://mrsc.org/Home/Explore-Topics/Public-Safety/Emergency-Services/Public-Health-Emergencies/Coronavirus-COVID-19-FAQs.aspx#limited-actions-at-council-commission-meetings
    - http://mrsc.org/Home/Explore-Topics/Public-Safety/Emergency-Services/Public-Health-Emergencies/Coronavirus-COVID-19-FAQs.aspx#authority-to-postpone-continue-land-use-hearings

From: Dick Scheel
Sent: Wednesday, May 20, 2020 6:01 PM
To: 'Mark Hofman' <MHofman@snoqualmiewa.gov>; Bob Sterbank <BSterbank@ci.snoqualmie.wa.us>
Subject: Comments to the Draft EIS

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Sincerely,
Richard Scheel
6701 W Crest View Loop SE

Letter No. 70

Mark Hofman

From: Patricia Fels <patriciatusafels@gmail.com>
Sent: Thursday, May 21, 2020 8:41 AM
To: Mark Hofman
Subject: Snoqualmie Mill PCI
Attachments: DraftEIS.doc; powercoverstudy.pdf

Categories: Green category

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MAY 21 2020
City of Snoqualmie
Community Development Department

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Hello Mark,
Please find attached a comment letter on the Snoqualmie Mill PCI. I am also attaching a report on the Mill site that King County funded in 2006. This report does not appear to have been consulted for the EIS and should be part of the record.
Many thanks,
Patricia Fels

P T F A R C H I T E C T S

Mark Hoffman
Community Development Director
City of Snoqualmie

Re: Draft EIS, Snoqualmie Mill PCI
May 19, 2020

I read with great interest the Snoqualmie Mill PCI Plan. In 2004 PTF Architects and I.L. Gross Structural Engineers completed an Assessment of the Mill Site; this was followed by a more thorough study of the Powerhouse complex (Snoqualmie Falls Lumber Company Powerhouse Rehabilitation Study, 2006). Having spent quite a lot of time on the site in addition to having served as the chair of the King County Landmarks Commission and being a long-time resident of the Snoqualmie Valley I am keenly aware of the importance of this site. Over the years I have spoken to the different owners in an attempt to have them perform basic maintenance on the remaining Mill structures. I have also tried to interest any and all in the benefits of reusing these historic structures.

The present EIS is thorough in examining the site, but the plan is weak in not putting in place a stronger proposal for insuring the integration of the remaining structures from the Snoqualmie Mill. The massive timber sheds, the Powerhouse, and the defining smokestack should have a presence in any development of the site. Basic maintenance needs to be done when development commences on the site. My greatest fear is the much used 'demolition by neglect' where a structure is allowed to deteriorate to the point that demolition is allowed. 70-1

The reuse of all of the timber sheds must be a part of the proposed future site development. The City of Snoqualmie would be missing a unique opportunity if they were not assured continued life and serve as key components of any future Snoqualmie Mill development. Timber buildings of this size are irreplaceable.

The Power Plant, including the Smokestack, will require substantial work. The PCI is clear that these structures will be saved, but can they wait 10-15 years? For now, some basic roof repairs (mentioned in our report of 2006) would protect the main Power Plant structure until a future date.

I realize this is only Phase 1, but the future role of these buildings must be guaranteed from the beginning of the process. I thus ask that a definite commitment to the maintenance and future reuse of these structures (noted in the Draft EIS, page 3-242, Exhibit 3.10-8) be included in the Snoqualmie Mill Plan. Even though the rehabilitation will be part of Phase 2 and 3, the commitment to maintain and integrate all of the structures into the development should be clearly outlined in the Phase 1 document and become a condition for the City of Snoqualmie's PCI approval.

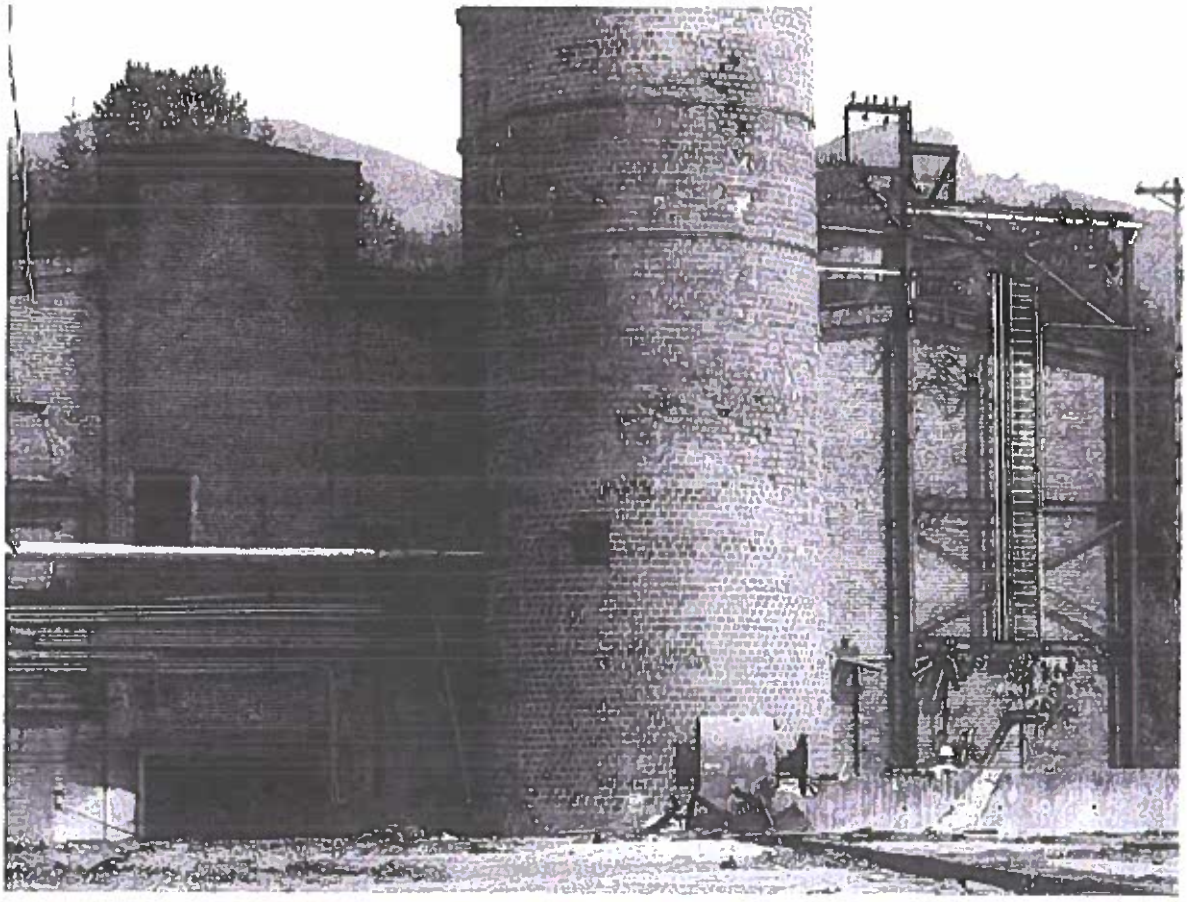
Sincerely,
Patricia Fels
PTF Architects

Att: Snoqualmie Falls Lumber Company Powerhouse Rehabilitation Study, 2006

30002 Issaquah-Fall City Rd. * Fall City, Washington 98024
206-353-4174 * Email: patriciatusafels@gmail.com

SNOQUALMIE FALLS LUMBER COMPANY POWERHOUSE

REHABILITATION STUDY



PTF ARCHITECTS
I.L. GROSS STRUCTURAL ENGINEERS
December 2006

SNOQUALMIE FALLS LUMBER COMPANY POWERHOUSE

REHABILITATION STUDY

Prepared for: **4Culture/ Cultural Development Authority of King County**

December 2006

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INTRODUCTION

I.L. Gross Structural Engineers and PTF Architects were hired by 4Culture to evaluate the Powerhouse and Brick Stack (Power Plant) at the Snoqualmie Falls Mill. Their tasks are:

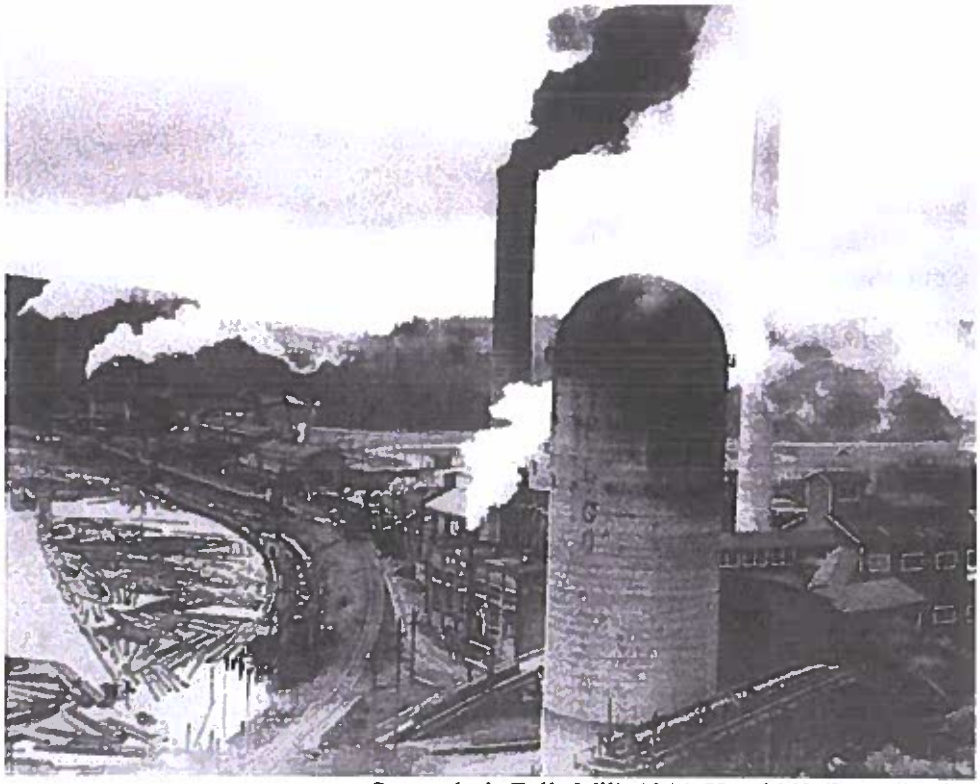
To survey the existing conditions and analyze the structural elements

To provide preliminary designs for structural stability and future rehabilitation, including sketches of new braced steel frames

To examine building code, zoning and land use requirements and how they impact the building

To provide a cost estimate for making the structure sound and weatherproof, along with a square foot redevelopment estimate for three development scenarios.

This report is the result of their study.



Snoqualmie Falls Mill, 1944, Harold Keller collection

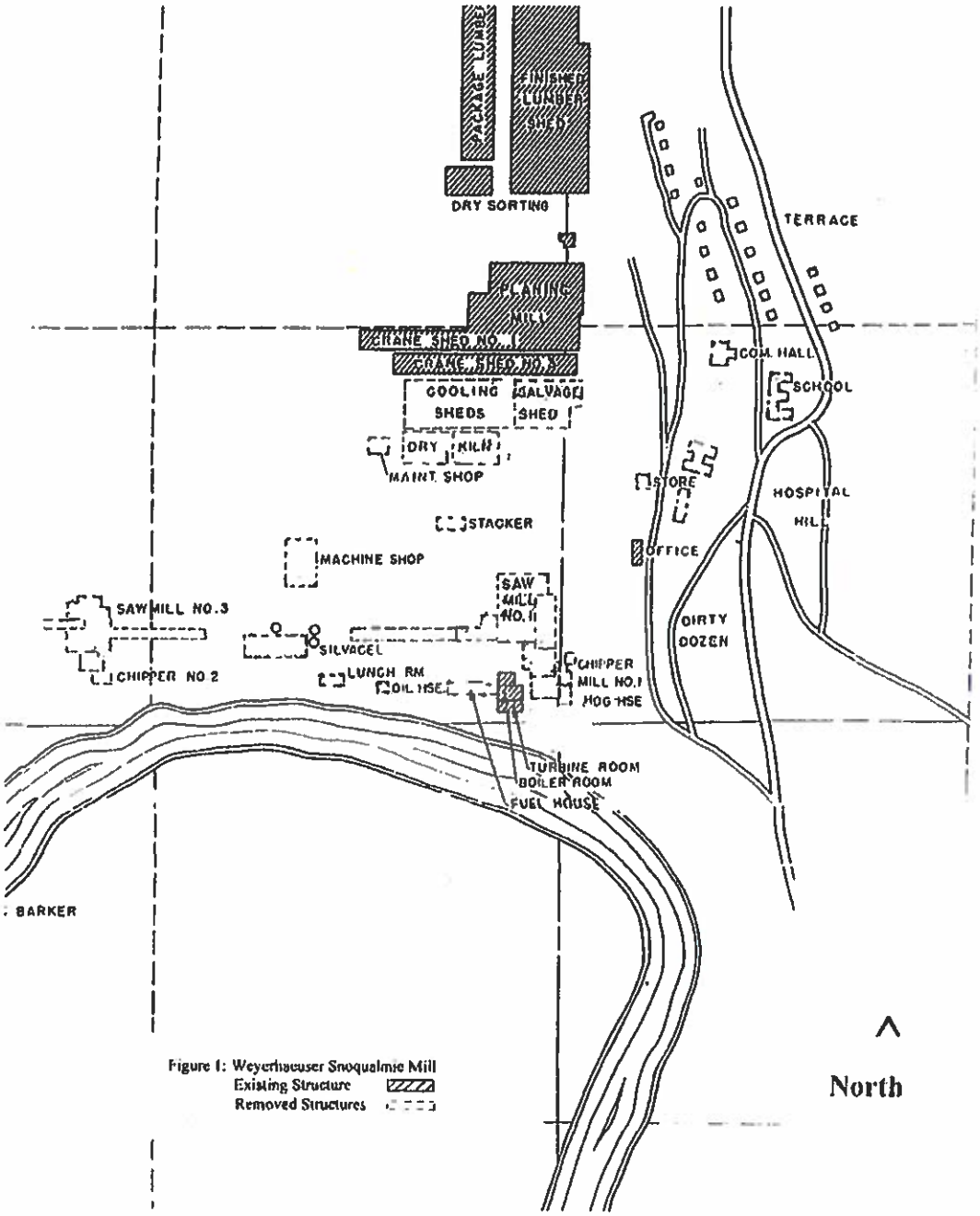
BACKGROUND

The Snoqualmie Falls Lumber Company (SFLCo) began operations at a site north of the Snoqualmie River and east of the Falls in April 1917, and continued in operation until 2003. The Weyerhaeuser Timber Co had partnered with Grandin Coast Timber Co to form the Snoqualmie Falls Lumber Co in 1914. The Weyerhaeuser Co remains the owner of the site. The remnants of SFLCo stretch from the millpond at the southern boundary to the lumber sheds at the north. Timber was brought to the site and stored in the mill pond. From there it was moved to the adjacent sawmills and slowly made its way north through the dry kilns, cooling sheds, and planing mill. The Power Plant sat between sawmills No 1 and 2.

Today, most of the mill buildings have been demolished and all of the community buildings and houses that were located to the east, north, and southeast were removed in the fifties and sixties. Several large timber warehouse sheds do remain on the site, north of the powerhouse. In 2003, the Weyerhaeuser Company applied for a demolition permit for the Power Plant. Although Weyerhaeuser subsequently demolished a 1947 concrete smokestack, strong community opposition delayed demolition of the historic powerhouse and smokestack. With its prominent brick smokestack, the power plant is the primary remnant of what was once an extensive mill development, the heart of the Snoqualmie Valley's economy.

In March 2005, the Power Plant was designated a King County Landmark by the King County Landmarks Commission. The designation notes the key role that the timber industry played in western Washington and the importance of the Power Plant in the transition from steam to electric power, "a pivotal landmark of engineering for the entire timber industry."

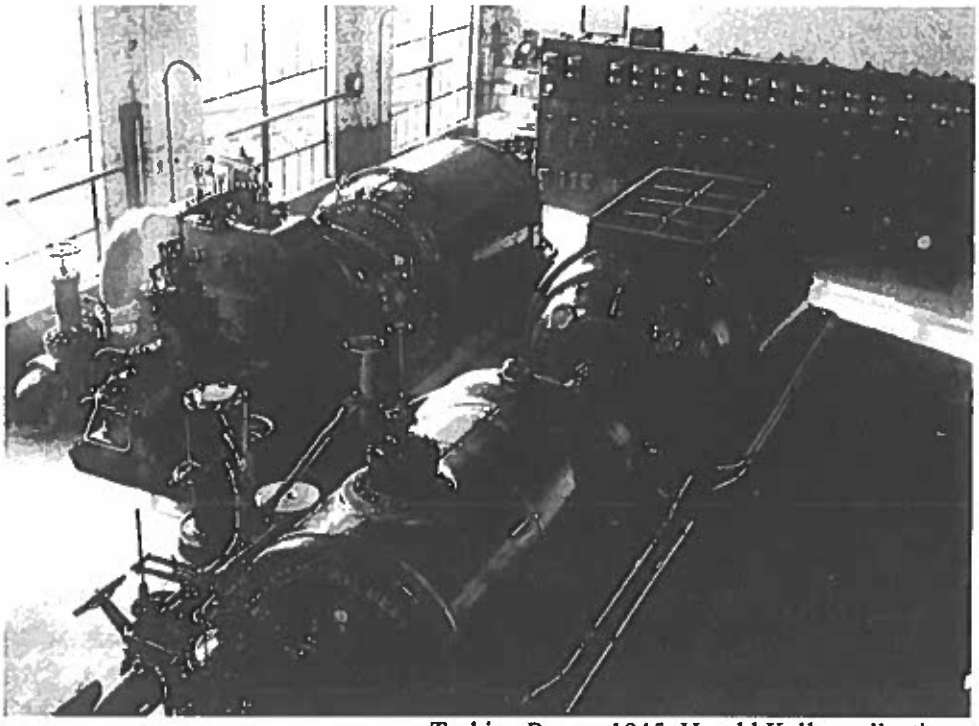
In 2005, the Power Plant was placed on the Most Endangered Historic Properties List by the Washington Trust for Historic Preservation. This list was created in 1992 to bring attention to threatened historic sites. Every year, sites are chosen based on the property's significance, the degree of endangerment and evidence of local community support.



SFLCo. Site Plan

THE POWER PLANT

In 1916 SFLCo commenced work on an innovative idea – that of electrifying their new mill. The brick powerhouse and 200-foot brick stack were built in 1916/17. The structures sat between mill #1 (demolished in 1989) and the millpond. Dave Battey of the Snoqualmie Valley Historical Society called the complex of fuel bunker, powerhouse, and stack "the heart of the mill" because it literally kept the mill going, pumping electrical energy to the saws, the equipment of the mill, the homes of the workers and the logging camps.



Turbine Room, 1945, Harold Keller collection

The Snoqualmie Fall Lumber Company (SFLCo) was the 2nd in the nation to be electrified (the Everett Mill was the 1st) and the 1st to bring electricity to the timber cutting operations in the woods. Power was generated by burning all the scrap (bark, chips, sawdust, etc.) coming out of the mill. The mill generated its own electricity until the 1980s. The powerhouse provided all the steam required for the dry kilns until the 90s. Electricity was also sold to Puget Power. Much of this equipment still sits in the powerhouse.

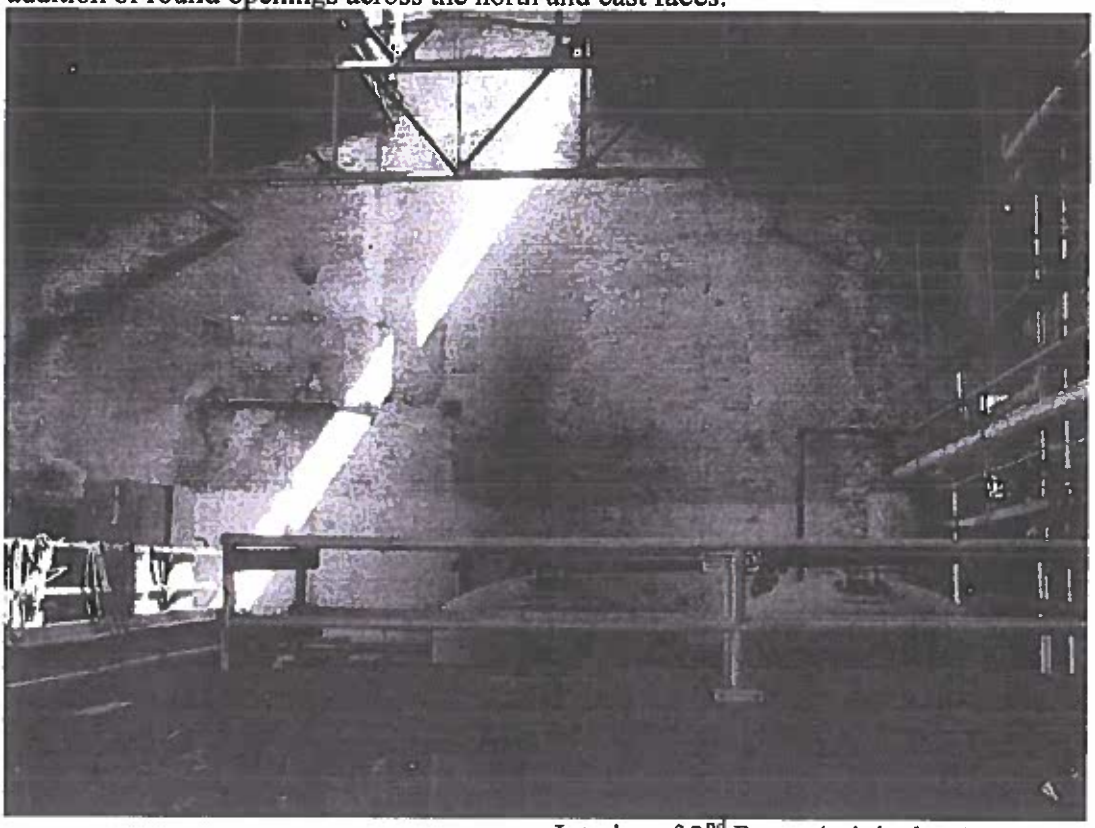
The electricity generated at the powerhouse was used for all the logging camps run by SFLCo. These camps, connected by railroad track and power lines to the main

mill site, were publicized as signs of modern logging. Using new equipment run by electricity, loggers were able to handle and transport large timbers.

The 200-foot stack for this generating plant was constructed of radial perforated brick, in multiple wythes. The stack is nineteen feet in diameter at the base and thirteen feet in diameter at the upper lip. Still visible on the side of the stack are the company initials, SFLCo. According to local sources the tower was hit by lightening early in its life. At that time steel banding was installed on the tower.

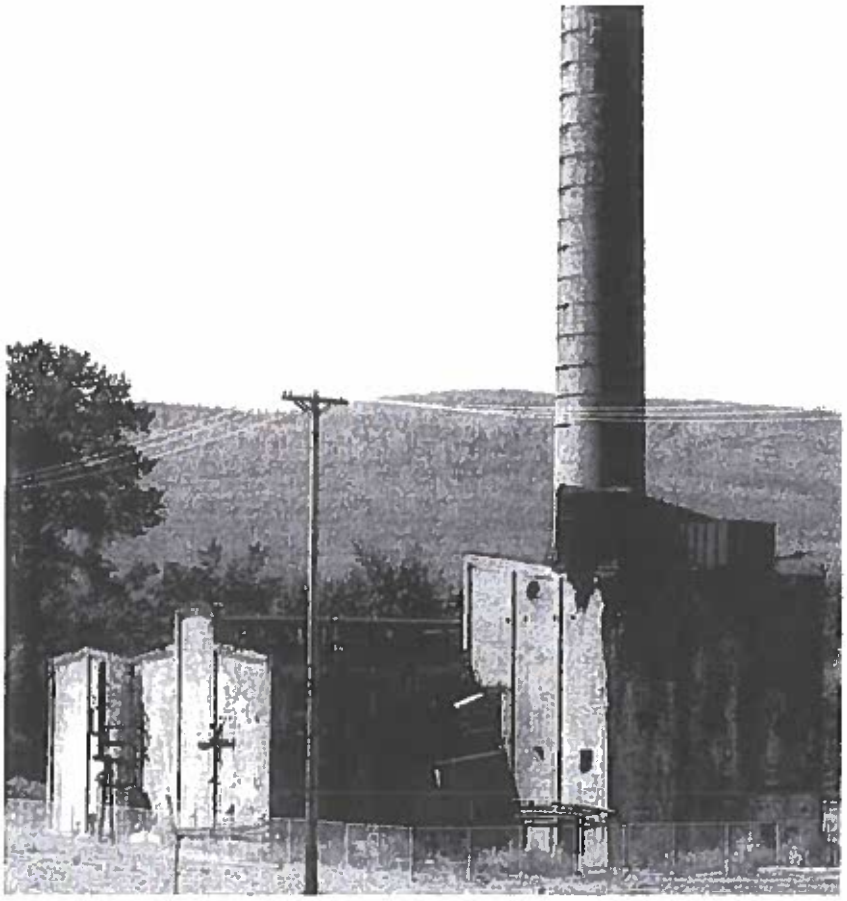
The brick powerhouse has three separate 'rooms'. Height varies from 30'- 40'; length is 140' and width is 84'. The 1st section (closest to the mill pond) houses the turbines, the 2nd (home to the original boiler) has backup equipment, and the 3rd surrounds a massive boiler. The first two rooms form the original building, directly east of the stack. The south Turbine Room holds generators, electrical switching gear, control panels, and the turbines. Large window openings face the Mill Pond. The 2nd 'room' has a raised center clerestory roof. Both rooms have steel trusses. Pilasters delineate the brick facades. The gable and a raised clerestory are outlined on the east and west facades.

The 3rd 'room' is the tallest and was built in 1929 when an additional boiler was added. The brick detailing on the façade matches that of the main building, with the addition of round openings across the north and east faces.



Interior of 2nd Room (original Boiler Room)

ASSESSMENT



Building

The powerhouse is an unreinforced masonry building with steel roof trusses and a concrete foundation. All the rooms have 3-4" thick prefab concrete roof panels resting on steel purlins which span between the steel trusses. All the walls are brick, approximately 12" thick. Plans found on site show a 20" thick basement slab and 24" wide concrete basement wall at the turbine room. The main floor of the turbine room is a concrete slab 13'6" above the basement slab. A mezzanine floor (added at a later date) is located at the west end of the room and houses electrical equipment. Historic photos show multipane industrial style windows on the south facade of the turbine room.

The turbine room has several openings to the adjacent room, the former boiler room. This room has a concrete slab on grade, a series of catwalks, and a mezzanine on the west. A raised clerestory roof runs the full east-west length of the building.

In 1929 an addition was constructed to the north of the original boiler room. This large space housed the new boiler. The south side is open to the original building. The brick exterior walls of the '29 Boiler Room have circular openings which appear to have been designed to be unglazed. The northeast corner of this building was hit when the 250' high concrete tower was demolished (detonated) on August 11, 2004. The tower veered and knicked the side of the powerhouse as it fell.



Turbine Room Interior

Since the facility was put out of commission in 1995, no upkeep has been undertaken. The Weyerhaeuser Co has completed the majority of the hazardous material abatement. They state that all the PCBs have been removed and the asbestos abated. The structures show signs of lack of maintenance: parts of the roof leak, all the windows have been removed and some of the brick needs re-pointing. In general, the brick is in fair condition, except for the damage from the 2001 Nisqually quake and the tower detonation. The Nisqually earthquake caused cracks in the brick of the powerhouse and also a hole in the northern side of the original two room powerhouse. The tower detonation caused damage to a corner of the '29 Boiler Room. A large fuel bunker building to the west was demolished in 2004. All the pipes, tubes, and fuel chutes that connected to the powerhouse were severed but several large metal chutes and many pipes remain hanging off the building.

The Weyerhaeuser Co has 'cleaned up' the building in that all hazardous material has been removed. In addition, a salvage operation was underway before the building was landmarked. Reuseable electrical equipment was removed along with salvageable metals. However, large equipment (boilers, turbines, etc.) remains, along with a fascinating collection of gages, dials, tools, and paraphernalia. Electrical controls and meters were mounted on slate panels because slate does not conduct electricity. This was the control center until the mezzanine was built and more modern switching gear was



Detail of slate wall in Turbine Room

installed. (See 1945 photo on page 5) An industrial archaeologist or historian should document the remaining material before it disappears. Some of the equipment might be saved for display at the Powerhouse or at the Snoqualmie Valley History Museum. The turbine room has a large chain hoist that was used to move equipment. The hoist could remain if moved to a permanent position at the east or west wall. The 1929 boiler building contains the largest piece of equipment, a mammoth water tube boiler. Because of the size and permanence of the boiler the option of stabilizing the '29 boiler room and leaving it as a ruin is considered in the redevelopment schemes.

Like other historic buildings, accessibility must be upgraded to meet Washington State accessibility standards, along with the 2003 International Building Code (IBC) provisions. Considering the relatively flat site and floor elevations, the main entrance could be made accessible. The redevelopment scenarios include costs for an elevator for access to any upper floors. New stairs and restroom facilities would meet all IBC standards. Since the building has no mechanical systems, a new system would be installed. All the electrical would need to be upgraded.

Structural Conditions & Recommendations

Based upon observations during the walk-through, conversations regarding the proposed renovation, and a preliminary evaluation of the programming design alternates, this building is generally sound and may be renovated for use as housing, light industrial, office or retail space. There is no evidence of foundation settlement, or member distress in any of the major structural elements.

As is usually the case with structures of this age, they are deficient primarily from a life safety standpoint. The required structural modifications would be nothing out of the ordinary for buildings of this age and type of construction in the area. The seismic analysis of existing structures, such as the Powerhouse is not adequately addressed in the International Code (IBC), which is basically directed towards new construction. Total compliance with the IBC requirements would not be practical or economical. Many portions of historic structures cannot meet minimum requirements in the IBC without significant reconstruction. The methodology used in the analysis of existing structures is the documents produced by the Federal Emergency Management Agency (FEMA). These documents serve to order possible deficiencies in buildings of various types based on prior earthquake experience. FEMA documents 356,273,274, and 310 were used in the evaluation of this building. The Special Procedure in FEMA 310 for evaluation of unreinforced masonry bearing wall buildings with flexible diaphragms will be used in the analysis of the existing components of the structure. A Maximum Considered Earthquake Ground Motion 0.2 second Spectral Response Acceleration (S_S) of 1.5 and a Maximum Considered Earthquake Ground Motion 1.0 second Spectral Response Acceleration (S_1) of 0.5 will be used in the analysis of the building. The lateral force components in the structure shall conform to Life Safety Performance criteria in the FEMA documents. Drift in the structure shall be limited to the Life Safety Performance "guidelines" in FEMA 356 Table C1-3.

The structural modifications listed below are intended to up-grade the buildings lateral system to conform with seismic force levels as outlined by the FEMA publications and methodologies.

1. There is not an adequate structural diaphragm on the existing roof. The existing roofing will need to be removed. 1-1/2" 16 GA. B36 Metal deck shall be placed over the existing steel purlins and trusses. The deck shall be side seam welded at 12" oc. with (7) puddle welds per deck section. The deck shall be placed over the entire roof of all the portions of the building. A new roof shall be added per architectural recommendations.

2. Roof-to-wall ties shall be added at the top of all the exterior masonry walls. The ties shall anchor the existing masonry walls back to the new roof diaphragm. See the attached roof framing plan for the existing framing member layout. Where existing C8 purlins frame to the exterior walls, a 4x4x1/4 steel angle shall be welded to the top flange of the existing channel purlin. The angle shall be placed with the back face of the

vertical leg against the inside face of the masonry wall. The horizontal leg will be welded to the top flange of the purlin. A ¾" galvanized bolt shall be drilled through the vertical leg of the angle, through the existing masonry wall and tighten to a new Rosette on the exterior face of the masonry wall. The angle and rods shall be placed at 3'-0" o.c. (every other purlin). Where the purlins are parallel to the masonry wall, there is a single C8 purlin set flush to the inside face of the wall. Along these walls at 4'-0" o.c., a 4x4x1/4 steel angle shall be placed to span from the purlin at the wall to the next adjacent purlin (6'-0" away). Additional puddle welds in the deck at the 4x4 angle are required. A ¾" diameter rod shall be drilled through the web of the channel, through the masonry to a Rosette on the exterior face of the wall.

3. The existing steel trusses appear to be in good condition. There is no evidence of any overstress in any member or of any excess deflection in any portion of the spans. The trusses appear to be top chord bearing trusses. The connection of the top chord to the masonry walls does not appear adequate. The ends of the top chord of each truss shall be cut back and re-supported to a new steel brace frame column with welds. Please see the attached roof framing plan and brace frame elevations for existing truss and new column locations.

4. The existing masonry walls are overstressed when subjected to seismic forces. New steel braced frames should be added to reduce stresses on the existing walls. Please see the attached plans and elevations for locations and sizes of the proposed frames. We have analyzed the building for the addition of one floor in the turbine room and two additional floors in the original boiler room. At each horizontal braced frame beam, a 4x4x1/4x 0'-8" angle shall be welded to the top and bottom flange of the horizontal beam of the brace frame at 48" o.c. A ¾" all-thread rod shall be drilled through the vertical leg of the angle, through the masonry and tighten to a Rosette on the outside face of the wall.

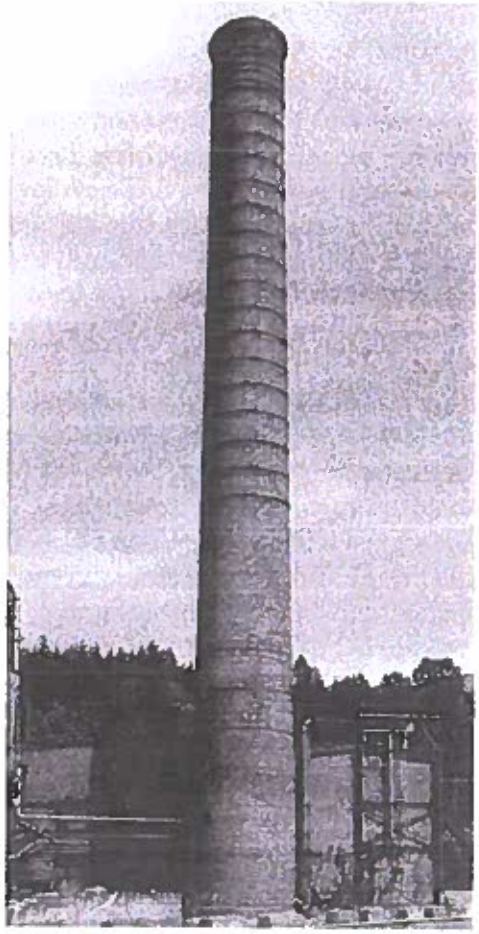
5. The brick of the existing masonry walls is in fair condition. There is some deterioration of the mortar in certain locations. There are several unsupported openings in the walls in several locations throughout the building. Various openings and cracks created by mechanical pipes should be patched with new brick. There are large cracks in the northeast corner of the original boiler room. Upon a closer review, most of the east wall of this space had pulled significantly away from the roof diaphragm. Several purlins appear to be un-supported due to this wall movement. The top portion of this wall should be removed and re-laid or connected to the new steel braces. The portion of unstable brick extends approximately 10' '-0" below the bottom of the trusses.

6. The northeast corner of the 1929 boiler room has severe damage. The building also contains large mechanical equipment which will make a new retrofit frame difficult to install. It is our understanding that the 1929 boiler room will be left in place as a "ruin." If this is the case, new hot-dipped galvanized brace frames shall be installed around the outside perimeter of the building on (3) sides. Please see the attached plan and elevations for frame locations and sizes. The columns of the exterior frames shall have ¾" all-thread rods drilled through webs and flanges into the masonry wall at 4'-0" oc for

the full height of the column.

7. New foundations will be required beneath retrofit frames in the original boiler room and 1929 boiler room. The frame columns shall be supported on a 18" deep grade beam spanning between auger-cast piles. The piles shall be approximately 16" in diameter. Each pile shall be installed on either side of the existing masonry wall. The grade beam will frame through the masonry wall to the piles.

8. The existing 200' tall smokestack appears to be in good condition. There is no evidence of settlement or cracking due to a seismic event. The smokestack is supported laterally by the unreinforced masonry wall shell framing the stack. It is approximately 19 feet in diameter at the base and 13 feet in diameter at the top. The smokestack is deficient from a life safety standpoint. Unreinforced masonry walls typically do not perform well when subjected to stresses due to a seismic event. The smokestack should be retrofitted with a new lateral system to prevent any future damage from an earthquake. Please see the attached sheets for options for installing a new lateral system to support the smokestack.



These comments are intended to inform as to the structural load path and deficiencies. There will be other areas requiring upgrading or structural modifications depending upon the final programming, architectural, mechanical and electrical modifications undertaken.

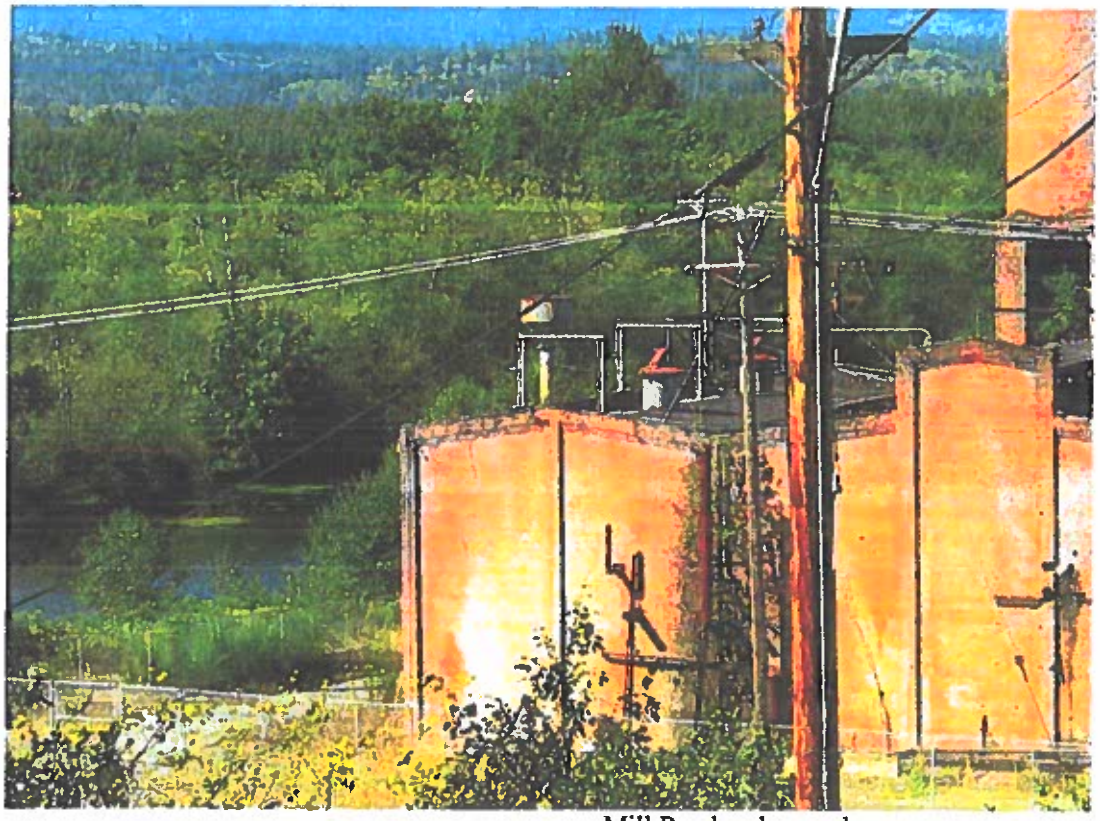
This analysis finds the building stable and, in general, in no danger of imminent collapse. For the immediate future, there are only two areas of concern. The first is the damage to the1929 boiler room from the fall of the detonated stack and the second is the east clerestory wall of the original boiler room. This wall shows the affect of the Nisqually earthquake. Construction experts from Pioneer Masonry Restoration visited the site and thought that the east clerestory wall could be secured through attaching it to the new steel frame and selectively filling holes.

Aside from these two areas the powerhouse is like many other unreinforced masonry buildings in the Puget Sound region: not in danger of imminent collapse. But without the new lateral system, the building and stack are prone to future damage in the event of a major earthquake. Once a new use is found for the building, the entire complex can be upgraded.

Site

The site is presently under King County jurisdiction. It is zoned Industrial, with a P- suffix. If any use other than a wood products industry goes on the site, it must be annexed to the City of Snoqualmie. The mill site is included in the City of Snoqualmie urban growth area (UGA). The assumption, by both King County and City of Snoqualmie is that the site will be annexed to the city. The City has zoned the site Planned Commercial/Light Industrial.

Much of the site, including the Power Plant, is in the Snoqualmie River Flood Plain. This designation requires that all new construction be elevated to the base flood elevation and meet standards called out in the city code. Flood Plain is not as restrictive as the Floodway, especially for non-residential development. Residential and non-residential development is allowed in the Flood Plain. The 100 year flood elevation is around 422. The Turbine Room floor is at elevation 426, the Boiler Room floor is at grade which is around 419.6. All the proposed new construction would place floor levels at or above elevation 422. The Mill site is generally flat (elevations vary from 416 at the northern timber sheds to 419.6 at the powerhouse) with a hillside at the east edge of the site. The Mill Pond water surface is 409.3 (All elevation information taken from Weyerhaeuser archive plans, including a 1994 water service layout.)



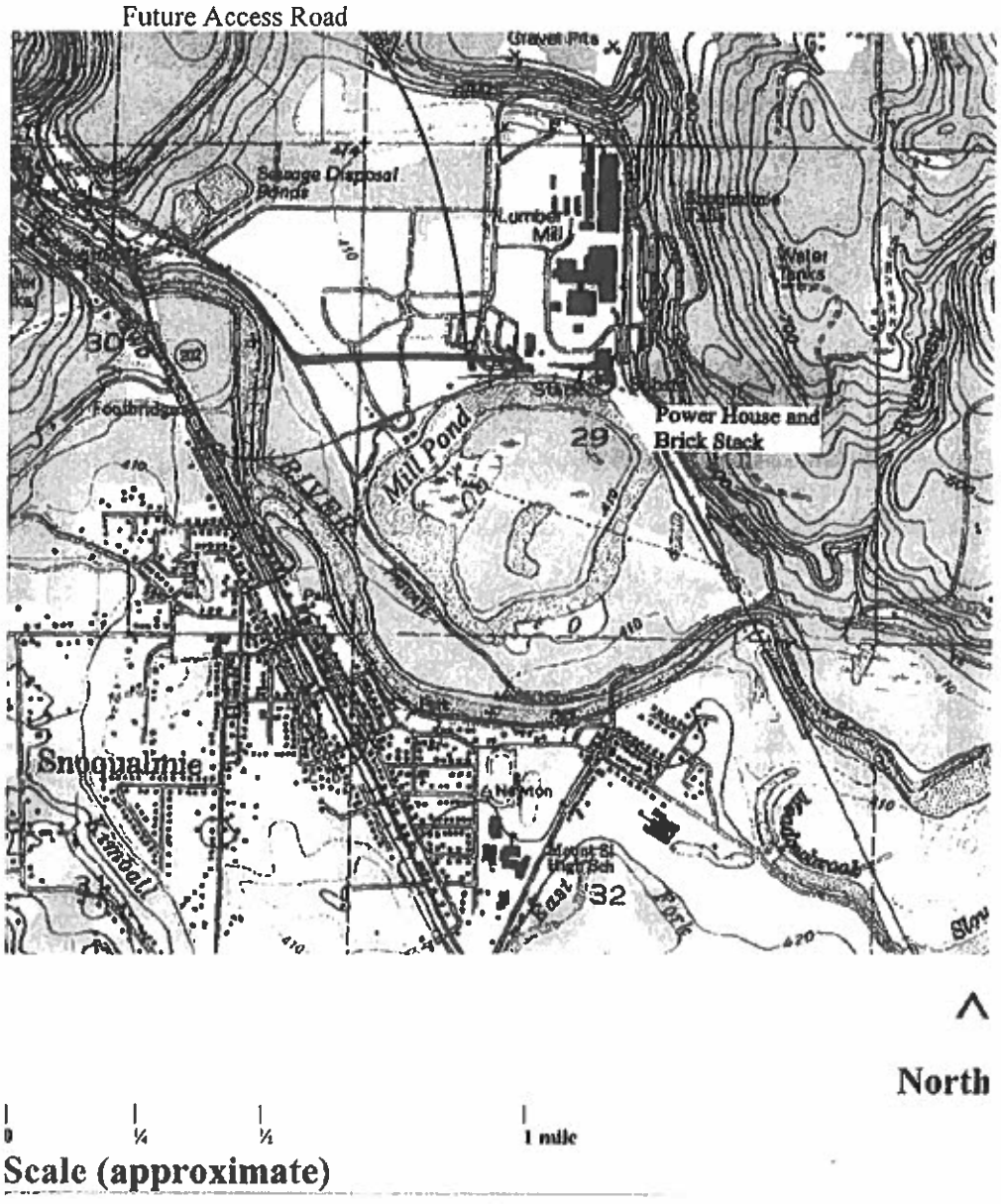
Mill Pond and powerhouse

Staff at the mill state that the powerhouse has only flooded once in the last 30 years (and at that time the entire site was flooded). The basement at the turbine room – which is 6 feet below grade – does gain water when the river nears flood stage. For any future rehab the basement would need a functioning sump pump (there are many in the present space but it is unknown if any are workable).

The Mill Pond is considered a sensitive area and thus any new construction at the site would have to maintain a 175' setback from the mean high water line (MHWM).

Both the City of Snoqualmie and the Weyerhaeuser Co prefer a planned mixed use development at the Snoqualmie Mill site. The City is very interested in improving the variety of jobs available in the city and encouraging new economic interests. City staff and Weyerhaeuser staff have begun discussions about site possibilities, including the future of the Mill Pond.

Presently the principal access to the site is from the east, although there are also roads to the west. Any future development would probably entail a new access road to the west that would connect up to Highway 202 near the Snoqualmie River bridge.



When the Mill was in operation, sewer and water service were provided by the City of Snoqualmie. A 1994 plan shows a 2" water line to the north of the Plant building. A Puget Sound Energy gas line runs across the mill site and could be extended to the powerhouse. Ample electrical lines are available.

POWERHOUSE USE OPTIONS

Several development scenarios are possible for the powerhouse. Before presenting these scenarios, some pre-conditions should be examined.

Larger mill site – use

The Weyerhaeuser Co sees the future development of the site as a given, although the actual activities could vary widely. They predict that development will happen sometime in the next 3-5 years. Development of the overall site will be integral to the success of the powerhouse rehabilitation.

Weyerhaeuser staff have noted the need for a new access road to the mill site. Present plans foresee this road entering from the west and connecting to Highway 202. Access to the powerhouse from the west would be ideal, providing an entrance view with the tower and powerhouse clearly visible.

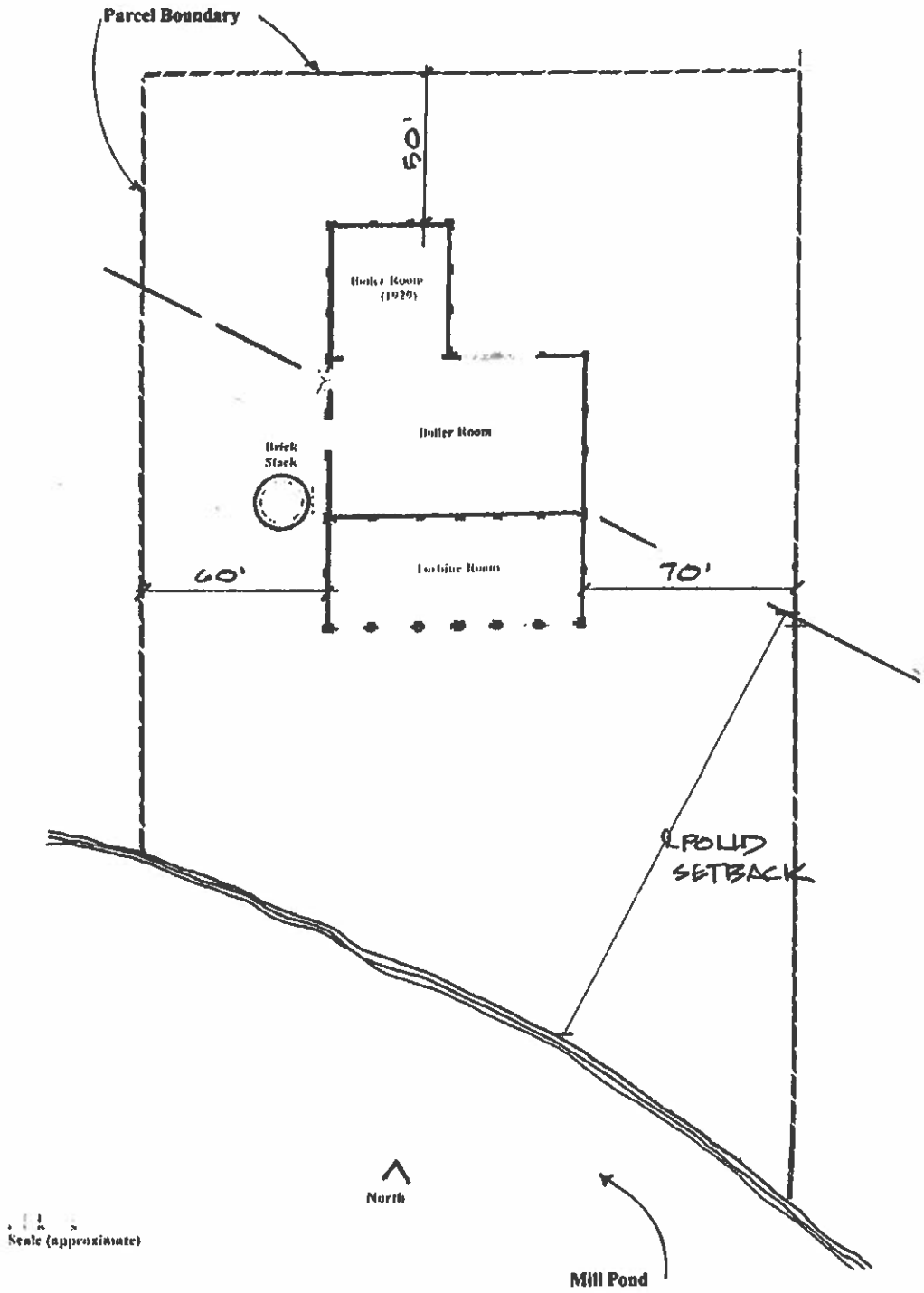
Since the powerhouse sits at the edge of the Mill Pond, it is important to understand the future of the pond. All parties appear to be in agreement that the Mill Pond and the land between it and the Snoqualmie River will become part of a natural resource area, either a park or part of a larger open space along the river.

There has been some discussion about moving some of the mill site out of Flood Plain designation. This would negatively impact the powerhouse if large amounts of fill material were placed adjacent to the powerhouse site. Considering Flood Plain regulations in King County this does not seem likely, but any activity should be sensitive to the powerhouse site.

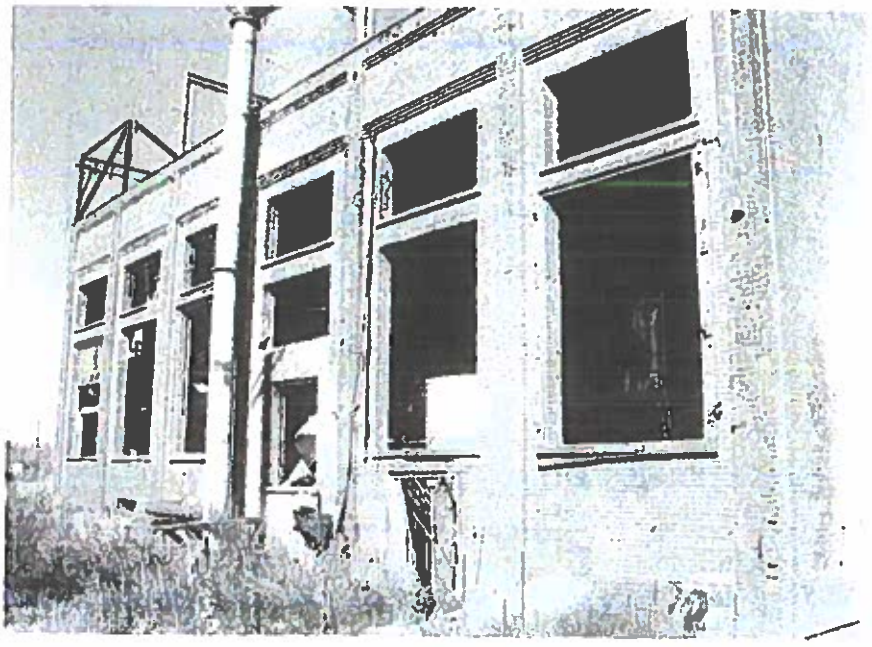
Ownership of the site and building

The Weyerhaeuser Co is willing to transfer the powerhouse ownership if a credible development offer is presented. The site was delineated at the time of Landmarking and is approximately 200'x 300'. Any interested party would have to reach an understanding with Weyerhaeuser and would have to be willing to stabilize the brick stack and rehabilitate the powerhouse.

Parking for the new powerhouse complex would be required. City of Snoqualmie standards were consulted to determine the amount of spaces. Since the landmarked site is quite small (and parking is restricted in the sensitive area setback), the Weyerhaeuser Co has agreed that they would be amenable to locating parking space on Mill site land.


Parcel Boundary
50'
Boiler Room
(1929)
Boiler Room
Brick
Stack
60'
Turbine Room
70'
POND
SETBACK
North
Scale (approximate)
Mill Pond

Site Plan



Landmark Status

The Power Plant is a King County landmark and thus, any changes to the landmark would have to be approved by the KC Landmarks Commission. King County uses *The Secretary of the Interior's Standards* as a guide in issuing a Certificate of Appropriateness (COA) for changes to a historic structure. In general all work would fall under the Guidelines for Rehabilitating (not preserving, restoring or reconstructing); rehabilitation defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions..." Window replacement and brick work repointing should be guided by methods in *The Standards.*

The interior electrical equipment is considered a 'feature of significance'. Since this equipment fills the space, it makes re-use as office/studio/workshop difficult. The Commission should be consulted early on in the process to clarify the status of the equipment. The authors of this report have contacted the Society for Industrial Archaeology and the Snoqualmie Valley Historical Museum to ascertain if there is any interest in the equipment.

The landmark designation also mentions "two remaining boilers in the original boiler room". On a walk through with Bob Hammerly, the former manager of the power plant, the purpose of this equipment was clarified. They are not boilers but water purifiers and miscellaneous support apparatus. The only remaining boiler is the large structure in the '29 boiler room.

Any additions to the Power Plant would require a COA from the King Count Landmarks Commission. There is a long tradition of complimentary additions to Landmarks and guidelines can be found in *The Standards*. Additions should compliment, not mimic the landmark. It should be clear that the addition is an "addition", and it should not overwhelm the landmark.

Listed historic buildings have flexibility in meeting present IBC codes. The Washington State Historic Building Code can be consulted. While insuring life safety, this code allows alternative code compliance methods in the hope that there will be less disturbance to the building's integrity.

Landmark status for the Power Plant means that the property owner would be eligible for a variety of incentives: building rehabilitation funds from county and state grants, the King County Landmark Loan Program, Tax Valuation incentive programs and Current Use Taxation. Staff at King County believe that the Power Plant would qualify for the National Register of Historic Buildings, based on its seminal role in the history of industrial electrification and its part in the history of the lumber business in Snoqualmie Valley and King County. Buildings on the National Register qualify for federal tax incentives, tax credits for up to 20% of rehabilitation costs, and new market tax credits.

Costs

Development costs center on building rehabilitation and renovation. Site costs noted are minimal, assuming that the larger Mill site development will handle the majority of site improvements. Access road costs are not included as a part of development costs. Utility costs are calculated from property line, assuming utility upgrade costs at the larger site would be borne by the Mill site developer. A general square foot cost for parking is included, although some of this parking might be located on the adjacent Mill site area.

All of the building costs assume that the building will remain 'industrial' in feel. In other words, the building materials and structure will be revealed, the finishes will be minimal. There has been an attempt to use as much as possible of the existing materials. The powerhouse has ample vertical space to allow for new floor levels. The steel frames can handle additional floor weight. Costs include the addition of one new floor at the turbine room and up to two new floors at the boiler room.

Cost estimates for the brick stack reflect an analysis of two alternative means of stabilizing the stack. The reinforced shotcrete ring appears to be the most economical.

New foundations for the braced frames and the brick stack consist of auger piles with concrete grade beams. Without a more thorough investigation of soils, only an estimate could be made of depth required for the piles.

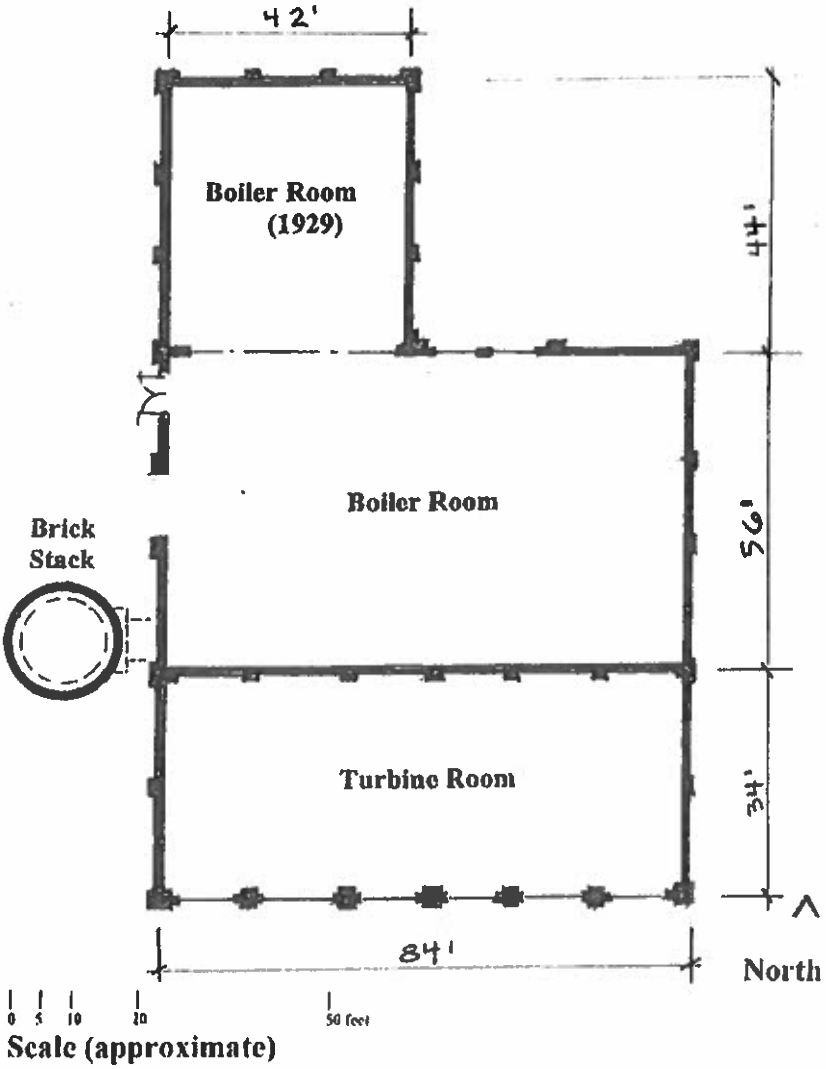
REHABILITATION ALTERNATIVES

The four scenarios below respond to discussions with Weyerhaeuser staff, interested developers, City of Snoqualmie staff, and members of the community. The first scenario details the basic costs to stabilize the structure and install a new roof. The four development schemes outline rehabilitation possibilities for the powerhouse. Scenario II is office space, IIA is a brewery or fabrication/light industry, Scenario III includes a new structure and would house office and/or light industrial; IV also has an addition and is based on an industrial arts center with workshops, retail, office, and studios for artisans.

All construction costs were generously estimated to insure a realistic number for rehabilitation. Detailed cost estimates are included in the appendix. Cost estimates do not include Design Services, Permits, and Sales Tax.

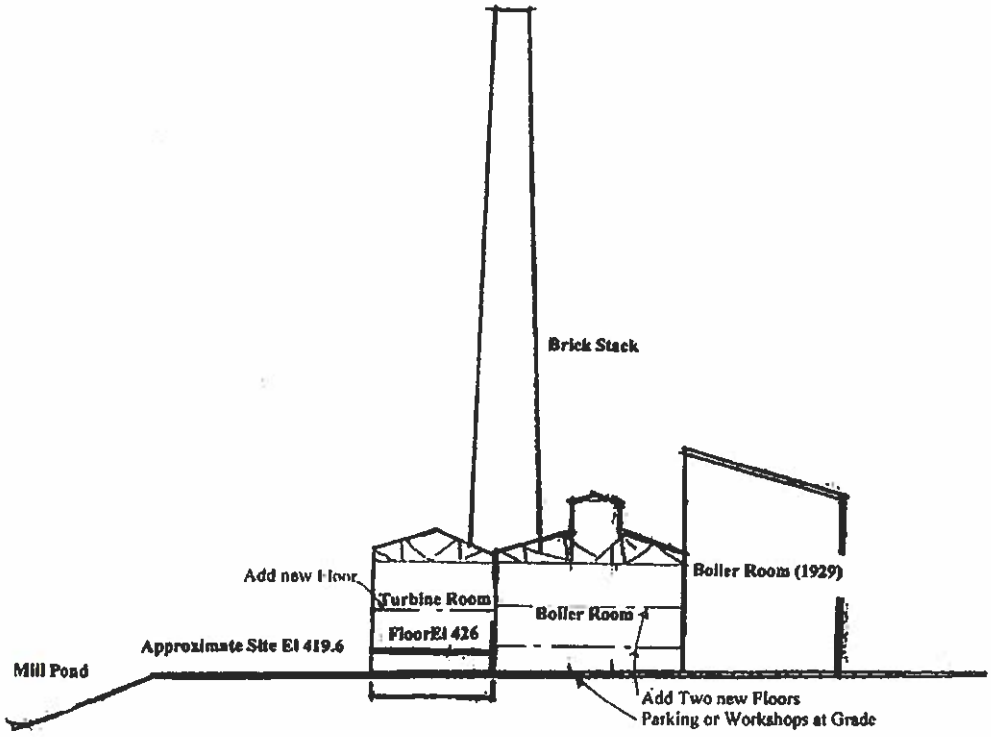
Scenario I:
Stabilize the powerhouse and stack. Building would be conserved for future use.
Braced steel frames, brick repair, new roof deck with insulation, new torch down roof.

Development Cost Summary:
Mobilization: $263,500
Building Stabilization (Concrete, Masonry, Steel & Roofing: $1,411,535
Sub Total: $1,675,035
Total (w/ Insurance & Bond): $1,906,729



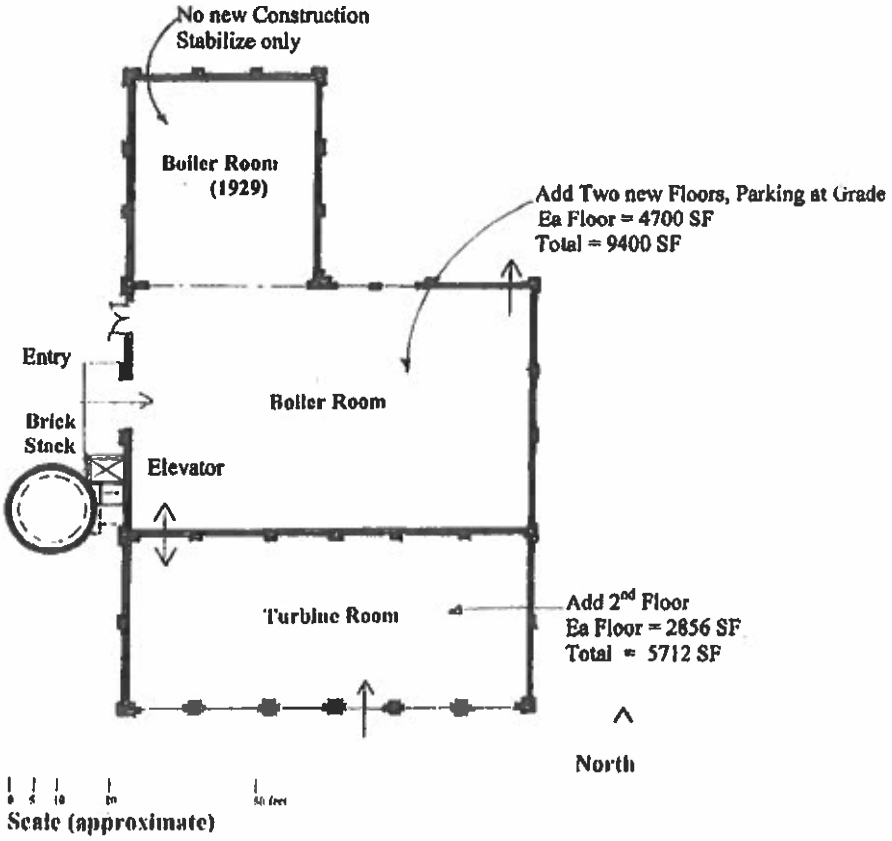
Scenario II:
Develop the powerhouse for office. The turbine building could be remodeled to include a mezzanine/2nd floor. Two floors would be added at the boiler building, placing both new floors above 100 year flood levels. The ground floor level would have parking for 12 cars; 20 more spaces would be outside. (All parking requirements are taken from City of Snoqualmie Municipal Code) An elevator would be installed to access all the offices. The '29 boiler building would be stabilized and left as a ruin. A total of 15,112 SF would be available for lease.

Development cost:
Mobilization: $343,078
Site Work: $158,000
Stack Stabilization: $348,362
Stabilization and Remodel: $1,778,382 ($118/SF of leasable space)
Sub Total: $2,627,822
Total (w/ Insurance & Bond): $2,991,308



Scale (approximate)

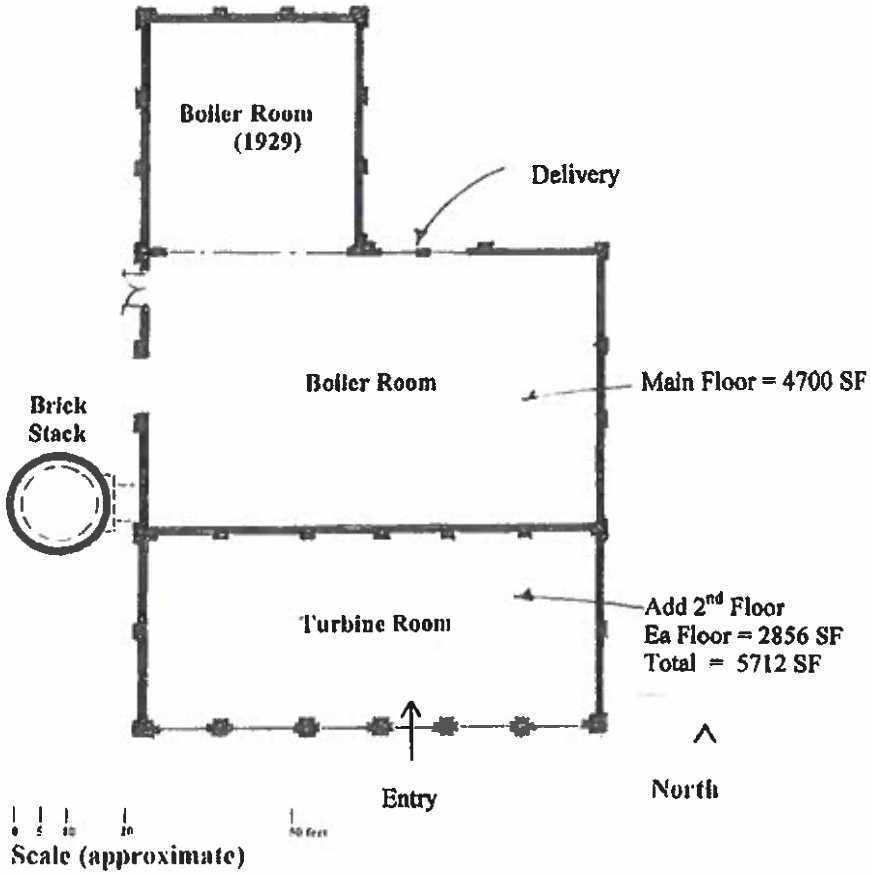
Elevation



Scenario II - PLAN

Scenario IIA:
Develop the powerhouse for a brewery or light industry, with storage, work space, retail, office and/or a pub. A 2nd floor could be added at the turbine building. The main floor could be used for retail or a pub; the 2nd floor for offices. The boiler building would be left open for brew space/fabrication space and storage. The '29 boiler building would be left as a ruin. 27 parking spaces would be provided outside. A total of 10,412 SF would be available for lease, with the possibility of additional mezzanine space in the big boiler room.

Development cost:
Mobilization: $343,078
Site Work: $158,000
Stack Stabilization: $348,362
Stabilization and Remodel: $1,644,963 ($158/SF leasable space)
Sub Total: $2,494,403
Total (w/ Insurance & Bond): $2,839,435

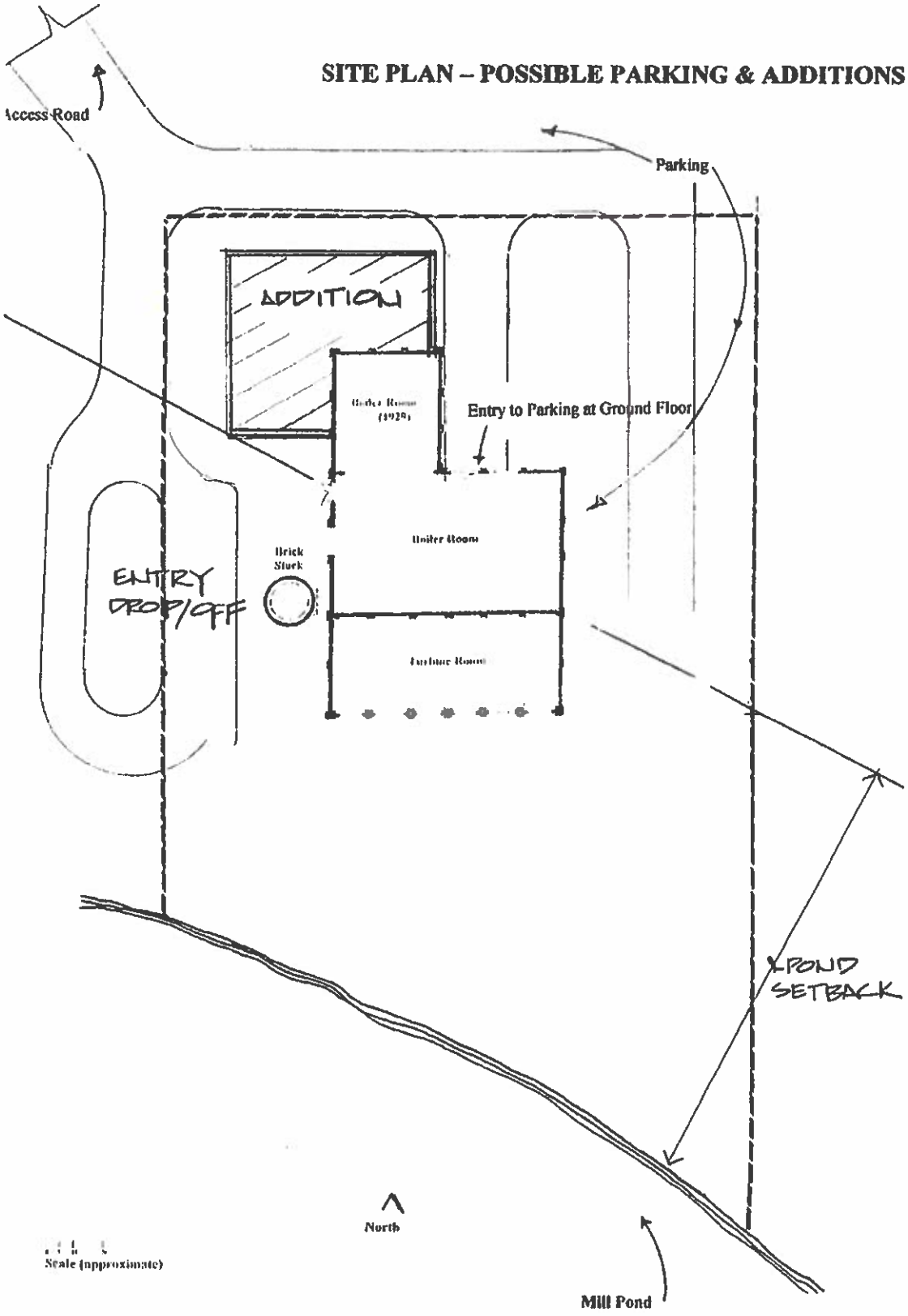


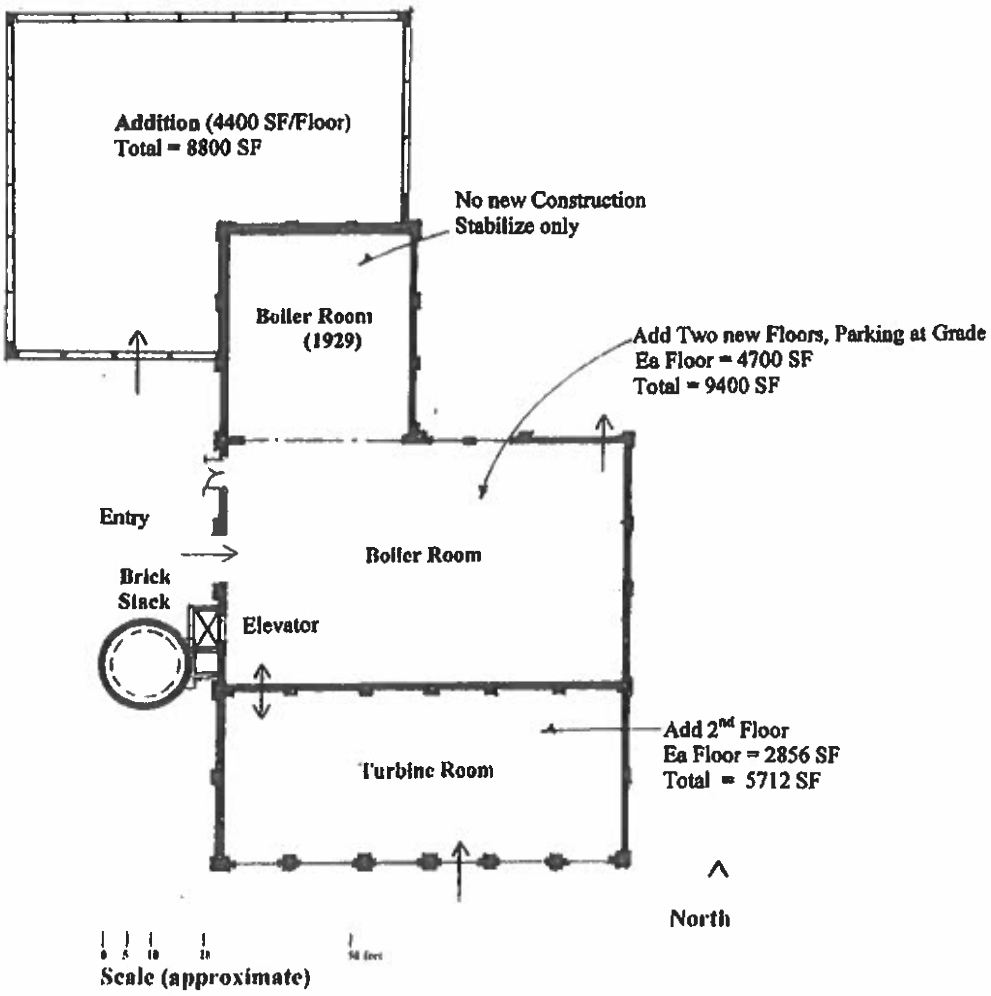
Scenario IIA - PLAN

Scenario III:
Develop the powerhouse for office/light industrial. Additions at the boiler room and turbine room would be similar to scenario II. A new structure would be built to the north and west of the '29 boiler building. This structure would sit where the most recent fuel shed and boiler were located and have two floors above flood plain elevation. This building would also brace the '29 boiler building. Landmark status does not preclude additions to historic structure. A Certificate of Appropriateness would be required from the King County Landmarks Commission.
A total of 23,248 SF would be available for lease. 36 parking stalls would be outside, 12 at the boiler building ground floor.

Development cost:
Mobilization: $343,078
Site Work: $172,000
Stack Stabilization: $348,362
Building Stabilization, Remodel & Addition: $3,098,382 ($133/SF leaseable space)
Sub Total: $3,961,822
Total (w/ Insurance & Bond): $4,509,830

SITE PLAN – POSSIBLE PARKING & ADDITIONS

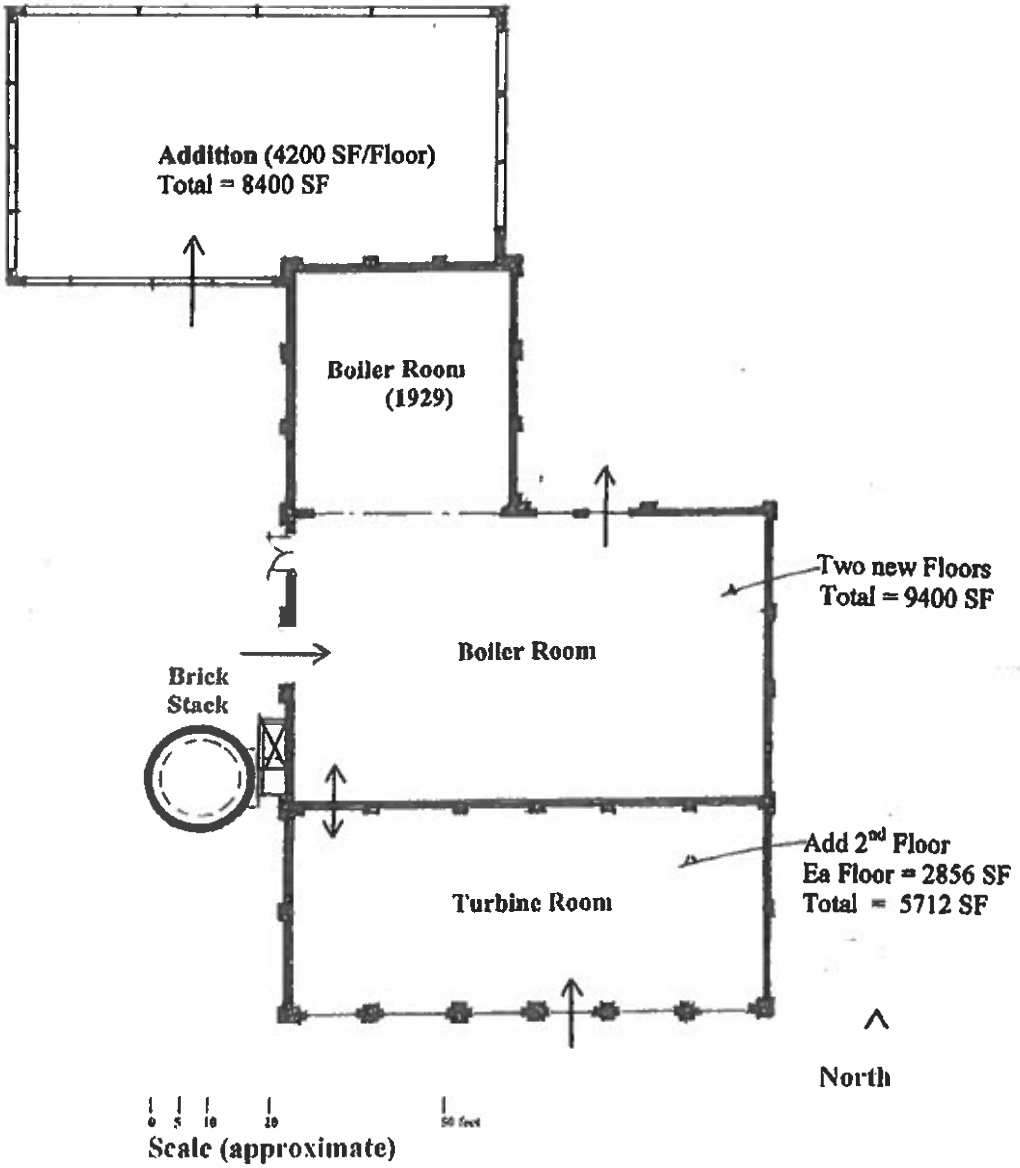




Scenario III - PLAN

Scenario IV:
Develop the powerhouse as an Industrial Arts Center with workshops, retail, office space, and a limited number of living quarters/studios.
This scenario responds to a need in the King County area for work/display/live space for craftsmen/fabricators who work in steel, wood, clay, concrete and glass. Studio space has become increasingly difficult to find/afford. There is interest in training for future fine art welders, ceramicists, woodworkers, etc. Artisans may produce limited editions or respond to individual projects. Their products would range from metal gates to light fixtures to custom woodwork.
The turbine room would have two floors, one for retail, one for office. The Boiler room would have ground floor workshop space and one floor added for additional workshops. This option includes a new two story loft building to the north/west. The City of Snoqualmie codes do not preclude living units if they are a part of a mixed use development and if they are above the flood elevation. 22,848 SF would be available and parking for 38 cars.

Development cost:
Mobilization: $343,078
Site Work: $172,000
Stack Stabilization: $348,362
Stabilization and Remodel: $3,038,382 ($133/SF leasable space)
Sub Total: $3,901,822
Total (w/ Insurance & Bond): $4,418,577



Scenario IV - PLAN

CONCLUSION

Having assessed the rehabilitation needs of the powerhouse and calculated the costs, it is also necessary to examine the benefits of this project, both at the economic and the community level.

There is a recognizable connection between sustainable development and historic conservation. Unfortunately this has only recently become clear in the United States. Throughout Europe the advantages of recycling buildings have been proven on the economic as well as the cultural and environmental level. Less material goes into the landfill and less energy must be consumed creating new building materials. The collective memory is sustained by the presence of important landmarks. We can look forward while remembering the past.

The possibility of proceeding on Power Plant work is linked to the development of the entire Mill site. Logically, the lead project would be the Mill site development. The future owner of the Power Plant would need to take advantage of the site upgrades (road, utilities) and infrastructure expansion that would be part of the larger Mill development. By celebrating the remaining structures on the site, (the timber sheds and the Power Plant), the mill site redevelopment would become more visible, more laudable and truly sustainable. Most established developers now want to be a part of 'sustainable' development; it just remains to make clear that the most sustainable approach involves the reuse and recycling of existing materials and buildings.

Older buildings act as incubators for small businesses. Creative start-up firms often prefer to locate in older buildings, especially if they offer affordable rents. Since the powerhouse once generated all the electricity needed by the local community, it would be fitting if new forms of energy (and energy-savings) could be utilized. A firm involved with renewable energy or some form of high tech fabrication would be especially appropriate and state tax incentive programs exist to encourage such uses. The powerhouse, restored as an example of sustainable development, could showcase the reuse of buildings and materials.

The Power Plant is an important monument for the timber industry and industrial electrification. Considering its close proximity to Snoqualmie Falls, the Salish Lodge, a future convention center, and a series of magnificent nature trails, the Power Plant could act as an additional focus for economic activity. A Mill site development which highlighted the Power Plant would have a 'draw', a known story that would encourage owners to locate their business at the site and visitors to make a stopover.

The Mill Pond is a spectacular visual amenity and could be a major asset to any development. This large open space adjacent to the future development provides opportunities for recreation as well as habitat protection. The ongoing cleanup of the mill

pond and the rehabilitation of the Power Plant present a creative example of reuse. The concurrence of natural and cultural resource rehabilitation expands the impact of any future development.

For a developer, the costs to rehabilitate a historic structure need to be balanced with the hope of a foreseeable profit. Costs above a 'break even' amount, especially the cost to secure the brick stack, need to be financed with a package of incentives and, as one source labeled it, a dowry from the site owner, future site developer, or government entity. Since the Mill Pond and its adjacent land will become a permanent open space, one possibility for a 'dowry' would be a land easement which brings tax credits. The tax credits could be a charitable donation to help 'save the stack'. Developing the powerhouse for commercial use opens up more possibilities for saving the brick stack: through a package of incentives, through future income producing activities, through constructing new leaseable space, and through creative financing that enlists federal tax credits and other available incentives.

The Weyerhaeuser Co has been generous in assisting this study and providing information. The transfer of the building to a new owner would be made more amenable if the heavy equipment now present in the building could be removed. Hopefully, the portable remnants of the powerplant will be transferred to the Snoqualmie Valley Museum or an Industrial Archaeology professional. Since the redevelopment alternatives leave the '29 Boiler building as a ruin, the space in and around this structure could be used for display of some of the electrical equipment, along with the powerful boiler. The remaining turbine housed in the powerhouse could be moved outside to serve as a totem of past history. The slate control wall from the Turbine Room could become a feature of the new rehabilitated powerhouse entry.

There have been several high-profile rehabs of historic powerhouses in Europe, reflecting a long tradition of finding new uses for old buildings. In Rome, a powerhouse was transformed into a museum. The huge turbines were left in the center of the space, juxtapositioned with classical statues. In London, the Tate Modern has moved into a powerhouse on the Thames. And, in Istanbul a powerhouse is being renovated to serve as a university library and Museum of Energy. Even in America, the powerhouse is gaining recognition. The Jersey City Landmarks Conservancy is leading a campaign to save the 1908 Hudson & Manhattan Powerhouse, the site of power generation for part of the New York subway system.

The authors hope that this report will assist in the future renewed life of this important structure. It is paramount that information about the Power Plant is disseminated widely. If initial contacts do not bring forth development interest, a Request for Qualifications for developers could be posted in the Daily Journal of Commerce or information could be posted to a website. Once a new owner is found, the Power Plant can remain a distinctive feature of the Snoqualmie Valley landscape. A story will stay alive and a major historic asset will be saved.

Letter No. 71

Mark Hofman

From: Kornelia Surmann <ksurmann@email.com>
Sent: Thursday, May 21, 2020 8:47 AM
To: Mark Hofman
Subject: Mill Site Development - Concerns

Categories: Green category

RECEIVED
MAY 21 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I am a resident of the City of Snoqualmie and have been for over 17 years.

During those 17 years I have seen the city grow from a small, cozy town into a sprawling suburbia continuing to grow without implementing proper traffic control. I live on SE Beta Street. When I purchased my home 17 years ago, it took roughly about 5 seconds to turn left onto Railroad Avenue in the morning on my drive to work. These days (pre COVID-19) I am forced to wait up to two minutes because of the onslaught of cars traveling down this road. The same goes for evenings when returning from work.

I am avoiding Snoqualmie Parkway at all cost. Every single work day, the backup at the I90 Snoqualmie Pkwy exit is about a mile long. By the way, it is really a safety hazard forcing these people to "stand in line" for 15-20 minutes just to get to their exit.

Now you are planning on developing the Mill site to add more businesses. Nowhere in your plans do you address the traffic. How many more people will now clog up Snoqualmie Parkway? It will likely affect my morning commute even more. Am I expected to take 20-30 minutes just to get on the highway? 71-1

I am not adverse to development. I work as a Construction Manager. However; the utter absence of traffic mitigation is simply unconscionable and in my personal opinion puts money above quality of life of the tax paying residents of this city.

Furthermore, I find it troubling that the city proceeds with these plans excluding the public during this pandemic. That is borderline opportunistic and also not entirely legal.

I would expect that the City of Snoqualmie investigate and lay out detailed plans on how to mitigate the additional traffic NOW, not when you are already under development. If you haven't already - I suggest you make your meeting public by posting a call in number on your website.

Sincerely,

Konnie Surmann
TAX PAYER City of Snoqualmie Resident

Letter No. 72

Mark Hofman

From: Wayne <waynestuff@comcast.net>
Sent: Thursday, May 21, 2020 9:00 AM
To: Mark Hofman
Subject: RE: outreach response to "Mill Site Webinair"
Attachments: Mill Site meeting.docx

Categories: Green category

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MAY 21 2020
City of Snoqualmie
Community Development Department

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No problem Mark,
I do have to apologize I didn't mean to read so fast, but I tried cutting it down by using acronyms.

I will attach it, and will be submitting an updated version prior to June 10th.

Wayne

Sent from Mail for Windows 10

From: Mark Hofman
Sent: Thursday, May 21, 2020 8:24 AM
To: Wayne
Subject: Re: outreach response to "Mill Site Webinair"

Good morning, Wayne

The transcriber captured much of what you spoke last night but is asking if you have the written comment page you read from so she can fill in gaps and capture your entire message. The speed you read and having your head down on camera made it tough but if you can forward your notes we can capture it all accurately for the record.

Much thanks

From: Wayne <waynestuff@comcast.net>
Sent: Monday, May 18, 2020 4:57 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: RE: outreach response to "Mill Site Webinair"

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Thanks for quick response.

What is the time frame for comments? Is it the 3 minutes as council meetings?

Wayne

Sent from Mail for Windows 10

From: Mark Hofman
Sent: Monday, May 18, 2020 4:39 PM
To: 'Wayne'
Cc: Kevin Smith
Subject: Re: outreach response to "Mill Site Webinair"

Thanks Kevin!

Good afternoon Wayne,

How may I clarify for you? To start I have attached the link and instructions for the 4pm public meeting on Wednesday, May 20, 2020. A beginning presentation at 4pm will clarify the expected protocol and how to give oral comment on the DEIS.

From: Kevin Smith <KSmith@snoqualmiewa.gov>
Sent: Monday, May 18, 2020 2:23 PM
To: 'Wayne' <waynestuff@comcast.net>; IT Help Desk <ITHelpDesk@snoqualmiewa.gov>
Cc: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: RE: Mill Site Webinair

Wayne

Thank you for reaching out. I have forwarded your question on to the Community Development Director so that he can address it.

Thank you,
Kevin Smith

From: Wayne <waynestuff@comcast.net>
Sent: Monday, May 18, 2020 1:48 PM
To: IT Help Desk <ITHelpDesk@snoqualmiewa.gov>
Subject: Mill Site Webinair

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Hello,

Could you tell us what the protocol and procedures will be for public comments?
Some of us who have signed up would like to know what to expect?

Thank you for your time and consideration,

Wayne

Sent from Mail for Windows 10

DEIS Mill Site Public meeting

Wayne Russell 8438 Meadowbrook/Wildcat Way SE

Having been a resident of Snoqualmie for 36 years in the Floodway and this upper falls area for a total of 41 years the implementation of the altered Planned Commercial/Industrial and this DEIS required for this is quite concerning, since under county guidelines if this had not been annexed would not have been allowed.

This timing of a public hearing/workshop should not have been considered until such a time that everyone including those who are not technical savvy would have the opportunity to participate when the effects of the pandemic allows group meetings. 72-1

This whole process has been behind closed city doors that are closed this time because of pandemic and have been since approximately 2009. It is obvious that the City and the Expert developer have been communicating recently since the DEIS was made available to the city a year ago and this meeting recently scheduled. 72-2

One citizen did a public records request when we were informed the city had received it last year. This person was threatened by our city to be sued because of what they thought the person was requesting and so it was not made public until now when the developer took two years to promulgate it and the city has been reviewing it for a year and the citizens are given 45 days?

Again, the city just decided to pull this out at this time for 30-day review by the public, but then the expert developer proponent requested the 15-day extension, so they appear to be the considerate party. On page 2 of the DEIS you will see any one of us could have 72-3

requested the extension per the WAC or SMC but it looks better to the council and others for approving if the site proponent requests it? If you also look at the Community Development Department cover letter dated 27 April 2020 you will see similar wording requested by SMV. 72-3

My concerns are the illegal berm placed around the old sort yard or Phase I of the PCI (Plan Commercial/Industrial) of developer and various LOMR's (Letters of Map Revision) which have changed the designations on FIRM (Flood Insurance Rate Maps) from Floodway to Floodplain introduced in 2010 which drastically changes the building codes used for both FEMA and the SMC.

This DEIS uses to the 2012 LOMR of which was for the PSE work at the falls. From these LOMR's the Base Flood Elevation was reduced by a little over one foot. The revised 2010 maps placed the BFE from 421' to 420'. 72-4

So, this brings up the question of why so many areas in the FIRM maps at 420' are considered Floodway now when the BFE is 420' and others considered Floodplain?

IN Appendix "A" of this DEIS you will see Figure 2-6 the BFE is approximately 423' by this study group and shows adding fill above this level for proposed development. You will also note that they are showing most of this area of existing ground being at approximately 415' to 420'? I would question this since most areas along Mill Pond Road are at approximately 400' per GPS and topography lines which I have furnished the city with at a council meeting in the last year or so?

Now the berms which have been mentioned in the preannexation plan, annexation implementation plan and this DEIS all suggest that the berms stay until the PCIP is implemented and development starts?

What goes on behind those berms with a company storing fill and materials behind those berms and the developer having to be turned in twice for not obtaining clearing and grading permits and re-drilling a

well without city knowledge? Storing fill materials in a floodplain or floodway should never have been allowed but is in the agreements?

Actual elevations should be provided by the Corps of Engineers or by surveyors who surveyed the site either prior to or upon annexation. 72-4

To justify this is when looking at the Appendix "A" Figure 2-3 shown is a "Floodwater and Wildlife underpass"? With the elevations at the proposed roundabout where the jersey barriers are at present being approximately 400' it would have to be the intent of adding 20' of fill to accomplish this to conform to their respective diagrams of Figure 2-6 thru 2-8?

Living on Meadowbrook Way is another major concern since traffic with the High School is already a major problem and the Tokul Roundabout is already a nightmare on weekends, and during the commutes. There has been little mention of the possibility of a bridge from the Snoqualmie Parkway to span the river. Is the developer going to pay for it or the citizens if this happens? PCIP states the possibility of 3400 jobs plus the proposed residential which once upon a time was not going to be is how will they access the site without impacting the already crowded roadways? 72-5

Letter No. 73

Mark Hofman

From: Maxine Loveless <maxinerosita177@gmail.com>
Sent: Friday, May 22, 2020 2:02 AM
To: Mark Hofman
Cc: richard@rksheel.net
Subject: Mill plan hearing

Categories: Green category

RECEIVED
MAY 22 2020
City of Snoqualmie
Community Development Department

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Mark,

I am currently a resident of Snoqualmie and have lived in the Snoqualmie valley since 2005. This email is to request a Public Hearing on the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. Per WAC 197-11-535, a Public Hearing is required if fifty or more concerned and/or affected citizens request it.

An actual in-person Public Hearing feels needed for this matter. All citizens along with anyone else who may be affected should have the right to be physically present, to listen, gain clarifications, voice their concerns, and those concerns be addressed and taken to heart. It is important that this Public Hearing happens at a future date when group gatherings are once again safe and allowed. A virtual meeting seems unreliable. There is the possibility of interrupted or limited access to it being online. I also feel there should be no rush. I feel determining whether to develop this land, or how to do so, and the actual development itself, is not an essential service during this unprecedented crisis we are trying to overcome. 73-1

Is there a way during this time that the city of Snoqualmie could focus their efforts towards coming together by helping the citizens, community, conserving the health of our land, and supporting the existing struggling local businesses?

Thank you,

Maxine Loveless
9624 Frontier Ave SE #A101
Snoqualmie, WA 98065

Letter No. 74

Mark Hofman

From: Michelle Huelmann <mhuelmann@yahoo.com>
Sent: Sunday, May 24, 2020 10:09 AM
To: Mark Hofman
Subject: Request for in-person hearing at Mill Site

Categories: Green category

RECEIVED
MAY 24 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I am requesting a public hearing on the Draft Environmental Impact for the proposed Snoqualmie Mill Planned Commercial Industrial Plan. According to WAC 197-11-535 it is required to have a public hearing when more than 50 or more concerned and impacted citizens make a request. There are well over 50 impacted citizens that will be impacted by this plan.

An in-person hearing is not only required by law, it is necessary on a project that has such widespread impact. There needs to be a public hearing where citizens can be present to voice concerns about this project. An online meeting does not meet this requirement and it impedes the ability for those affected to share their concerns publicly.

Thank you for your time.

Michelle Huelmann
Snoqualmie, WA

Sent from my iPhone

Letter No. 75

Mark Hofman

From: Karen Eggleston <eggskaren@gmail.com>
Sent: Monday, May 25, 2020 3:45 PM
To: Mark Hofman
Subject: Proposed Snoqualmie Mill PCI Plan

Categories: Green category

RECEIVED
MAY 25 2020
City of Snoqualmie
Community Development Department

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Hi Mark,

I'm writing to request an in-person public hearing for the proposed Snoqualmie Mill PCI plan. 75-1

I live outside of City limits but close to the site and have concerns about the impact, including environmental concerns.

Best,
Karen Eggleston
38528 SE 45th Place

425.444.0172

Letter No. 76

Mark Hofman

From: Adrian Eggleston <adrian@velectric.com>
Sent: Monday, May 25, 2020 3:55 PM
To: Mark Hofman
Subject: Proposed Snoqualmie Mill PCI Plan

Categories: Green category

RECEIVED
MAY 25 2020
City of Snoqualmie
Community Development Department

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Hi Mark,

I'm writing to request an in-person public hearing for the proposed Snoqualmie Mill PCI plan. 76-1

I live outside of City limits but close to the site and have concerns about the impact, including environmental concerns.

Thank you,

Adrian Eggleston

38528 SE 45th Place

425-246-2199

Adrian Eggleston | Superintendent
Valley Electric
cell. 360.840.9069
email. adrian@velectric.com **web.** www.velectric.com
Seattle. 2200 6th Avenue Suite #905, Seattle, WA 98121
Everett. 1100 Merrill Creek Parkway, Everett, WA 98203

Seattle Business 100 TO WORK FOR 2019

Letter No. 77

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Tuesday, May 26, 2020 8:18 PM
To: Mark Hofman; Bob Sterbank
Subject: Disputing the Snoqualmie Mill DEIS process

Categories: Green category

RECEIVED
MAY 26 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman and Mr. Sterbank,

In addition to submitting the below as a comment to the DEIS, I would like to submit the same as a direct communication to the city (not just as a DEIS comment). I dispute the legality of the current DEIS process on two grounds. Please respond.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065

From: Dick Scheel
Sent: Wednesday, May 20, 2020 6:14 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>; Bob Sterbank <BSterbank@ci.snoqualmie.wa.us>
Subject: RE: Comments to the Draft EIS

I would like to add the following references as part of my comments below:

1. The Governor's initial proclamation 20-28 (dated 3/24/20) contains the "necessary and routine matters" requirement. The initial proclamation is at: http://mrsc.org/getmedia/81ba5cd2-2db9-4f94-bd0b-287fea080f1f/w3p20-28opengov.aspx
    - For completeness, the Governor's proclamation updated 20-28.3, dated May 12, 2020, is at: https://www.governor.wa.gov/sites/default/files/20-28.3%20-%20COVID-19%20Open%20Govt%20Waivers%20Ext%20%28tmp%29.pdf

2. The initial guidance from the Washington State Attorney General was issued 3/6/20, before Proclamation 20-28. That guidance addressed general aspects of OPMA during the state of emergency. The first update to the Attorney General's guidance (there have now been 4 updates) contained information on how agencies should understand the "necessary and routine matters" requirement. That first update was issued 3/26/20, and can be found at: http://mrsc.org/getmedia/36a6b6cf-2ee8-469c-b600-0b6a8fa141f7/w3agcoronaopma2.pdf.aspx.
    - For completeness, the Attorney General's fourth updated guidance regarding the governor's proclamations, dated May 14, 2020, is at: http://mrsc.org/getmedia/0ddebf40-10d2-46af-9044-e9f237e69878/w3agcoronaopma4ud.aspx

3. The MRSC guidance that I quoted can be found at:

- http://mrsc.org/Home/Explore-Topics/Public-Safety/Emergency-Services/Public-Health-Emergencies/Coronavirus-COVID-19-FAQs.aspx#limited-actions-at-council-commission-meetings
- http://mrsc.org/Home/Explore-Topics/Public-Safety/Emergency-Services/Public-Health-Emergencies/Coronavirus-COVID-19-FAQs.aspx#authority-to-postpone-continue-land-use-hearings

From: Dick Scheel
Sent: Wednesday, May 20, 2020 6:01 PM
To: 'Mark Hofman' <MHofman@snoqualmiewa.gov>; Bob Sterbank <BSterbank@ci.snoqualmie.wa.us>
Subject: Comments to the Draft EIS

The following is a written version of what I said at the May 20, 2020 meeting for oral comments on the DEIS for the Snoqualmie Mill proposal. The portions near the end were not able to be given orally due to the 3 minute time limit for each speaker.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065

I claim that the current SEPA process for this project is not being handling in accordance with law. I submit the following:

1. The EIS was not completed within the time period required by Snoqualmie Municipal Code. Section 19.04.080(C) of the Snoqualmie Municipal Code states "Environmental impact statements shall be completed within a period to be set by the responsible official not to exceed 180 days, unless the city and the proponent of the action agree in writing to a longer time." Mark Hofman, the SEPA Responsible Official for the City of Snoqualmie, stated to me in an email dated May 13 2020 "The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant-City agreement to an additional time extension." The Draft EIS for this project has taken approximately three years to create, which is far in excess of the 180 days mandated by the Municipal Code.

2. Publishing the Draft EIS during the declared State of Emergency is contrary to the Governor's Proclamation 20-28. Proclamation 20-28 (issued March 24 2020, with several extensions, the most recent of which is 20-28.3, dated May 12 2020), states "agencies are further prohibited from taking 'action,' as defined in RCW 42.30.020, unless those matters are necessary and routine matters or are matters necessary to respond to the COVID-19 outbreak".

   Washington State's Attorney General issued guidance to state and local agencies on March 26 2020 regarding how they should understand the meaning of "necessary and routine matters". The main guidance on whether something is "necessary" is to consider whether the action must be done at this time, or if it could wait until later. Since this Draft EIS took approximately three years to produce, I claim that is not **necessary** to have the public review and comment period during the state of emergency. It could wait until the state of emergency has ended.

   The Attorney General's guidance on whether something is "routine" provides questions that an agency should ask itself when deciding that a matter should **not** be considered "routine". That questions are: "Is the reason for meeting on the matter unusual, special, and/or expected to be controversial and for which there will be a high

public interest? Is this an exceptional or unique new project we want to launch? Is this an 'out of the ordinary' matter?" The public review and comment for the Draft EIS absolutely matches the public review and comment for the Draft EIS, in every single point that the Attorney General's questions ask.

Further, the Municipal Research and Services Center (MRSC) advises local governments "Consistent with the Attorney General's guidance, we suggest you limit agenda items to areas such as approving payroll and other vouchers, approval of minutes of previous meetings, and other matters that cannot wait until you can provide a physical location where the public can attend." The MRSC also advises that the Governor's proclamations "provide a legal basis for an agency to postpone or continue" land use matters.

Because of these two clear violations of state and local law, I call for the Draft EIS to be withdrawn by the city. To remedy the violation of the Governor's proclamation 20-28, the city might re-issue the Draft EIS after the state of emergency has ended. I am less clear on the correct remedy for the violation of the Municipal Code.

Letter No. 78

Mark Hofman

From: Suzy Berger <suzy_berger@yahoo.com>
Sent: Wednesday, May 27, 2020 4:57 PM
To: Shared Mill Site EIS
Subject: Opposition to Snoqualmie Mill DEIS - Amphitheater

Categories: Green category

RECEIVED
MAY 27 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hello,

I am writing in response to the Snoqualmie Mill DEIS, namely the proposed Public Assembly Areas and specifically the proposed Amphitheater. I have a SEVERE concern about the proposed construction of the Amphitheater. I am OK with the efforts to restore the site to a source of local jobs, tourism and revenue with shops but not with a loud amphitheater which will not only increase the noise that we already hear at our home from the Casino, but the traffic will increase in these very rural surroundings.

I am also unclear as to whether the DEIS is being submitted for approval based on the intention to build the outdoor performance space or not. The verbiage is self-conflicting and ambiguous. Is the amphitheater to be built or not? Does the language indicating that it is allowed remain from earlier presentations because no one thought t remove it, or to allow it to get through uncontested? In the Master Drainage Plan, Figures 2-2 and 2-3, listed as the Active Landscape Open Space (including Public Assembly Areas) in light green toward the center of the drawing is clearly the amphitheater. On page 2-34, it is stated that "The outdoor performance space would be eliminated in this alternative at the request of the applicant", though on page 2-35 the space is clearly listed. It states there will be a 3.7 acre grassy area with a 2,000 square foot stage, accommodating 5,000 attendees at concerts to be held twice per week from June through September. On the same page, under 3., there is a "no action alternative'. It is unclear to me whether the DEIS is being submitted for approval based on the intention to build the outdoor performance space or not. The verbiage is self-conflicting and needs clarification before moving forward. 78-1

During the last round of presentations and input opportunities in mid-2017, it was very clear from public input that valley citizens did not want the amphitheater to be allowed as a part of the development. The council chambers were packed by citizens not wanting it. Even Tom Sroufe expressed surprise at the strength of the sentiments. The reasons given were numerous: Traffic, danger from concert attendees leaving concerts intoxicated, and noise, which a chief concern of my family and neighbors. I am already dealing with the over-amplified outdoor concerts held at the Snoqualmie Casino, and the Mill is much closer to our home, which is just over a mile from the potential amphitheater per the DEIS maps.

I can hear the Casino concerts from my home and the amphitheater would be the same, only closer. The orientation would have the speakers projecting the sound down Reinig Rd, right into my neighborhood. I feel it would be unconscionable to allow another source of over-amplified music to further degrade our community to the sole benefit of Snoqualmie Mill Ventures, LLC. When I should be able to enjoy some of our all-too-few warm summer evenings, I am assaulted in my own yard by music I don't like. Our community's base attractiveness is rooted in small town life in a bucolic setting, and to allow an amphitheater would demonstrate all the civic pride of cities like Fife and Puyallup.

I am pleading that you not let this happen. Remove the language allowing the amphitheater from the DEIS.

Thank you,
Suzy + Don Berger

Letter No. 79

Mark Hofman

From: Dick Scheel <dickscheel@outlook.com>
Sent: Thursday, May 28, 2020 5:25 PM
To: Mark Hofman
Cc: Matt Larson; Bob Sterbank
Subject: Problems with the May 20 Snoqualmie Mill DEIS online meeti

RECEIVED
MAY 28 2020
City of Snoqualmie
Community Development Department

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

I would like to provide feedback to the city administration on the May 20, 2020, online public meeting for oral comments on the Snoqualmie Mill DEIS. The issues I describe below add onto the other reasons I have previously sent to the city about why the DEIS process should not proceed during the COVID-19 state of emergency.

Of the people who have concerns about the Snoqualmie Mill proposed development, I know some personally. Judging by the May 20 meeting attendees, there are many others I don't know, as well as an unknown number of people who were not able to join the meeting. After the May 20 meeting, I reached out to the people I know to ask if they encountered any problems trying to participate in the meeting. This email gives you a compilation of their responses. 79-1

Five people sent me reports of problems connecting with the meeting. These five represented seven people in all, because some of them reported both their own issues and issues encountered by a spouse or friend.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
925-786-0078

Reported problems

- Meeting time: Not possible for me, so couldn't participate: 3 people
- Meeting time: Had to close my business early in order to participate: 3 people
- Login problems: 3 people
  - This was a mix of technology problems, instructions that are not clear enough for non-technical residents, incompatible devices, etc. The net result was the same in any case – the person could not connect to the meeting. Two of them were eventually able to go to a friend who was able to connect, and sit in on their Zoom session.
- Spotty internet connectivity at home: 1 person
  - This is another case of the digital divide discriminating against low income people, reducing their ability to participate in our democracy. An in-person meeting after the state of emergency has ended would have allowed this person to participate.
- Meeting operation: "Raise hand" process did not work when multiple people had to share one computer. They needed to share due to login problems reported above, but it could just as easily have been multiple residents in one household.
  - This was eventually resolved via email outside the call. If a similar problem had happened for someone who didn't have access to their email during the meeting, they would have been excluded.
- Meeting operation: "Raise hand" process for telephone callers was not clear to some people.

- The city provided the information in the published directions, but not everyone understood the instructions. Regardless of anyone's opinion of others' technical skills, this is another indication that the use of online meetings is failing some members of the community.

In addition to the problems reported above with being able to join the meeting or being recognized to speak, I observe these other issues myself:

- The 3 minute time limit
  - The time limit was too short for several people to finish their comments. This is an exceedingly long and complex DEIS. If a person had serious comments, they might have needed **hours** to give them all orally. This tends to force people to make the kinds of oral comments that are disregarded as having no legal bearing on the land use decision ("I don't want the project"), rather than the substantive and fact-filled comments that have legal bearing. 79-1
  - The time limit was not announced in advance, so people did not have any chance to try to prepare super-condensed versions of their comments.
  - To make it worse, commenters were told to speak more slowly so that the court reporter could keep up.
- Sound quality was poor for some commenters – not everyone owns good quality equipment.

Letter No. 80

Mark Hofman

RECEIVED
MAY 31 2020
City of Snoqualmie
Community Development Department

From: Dick Scheel <dickscheel@outlook.com>
Sent: Sunday, May 31, 2020 2:49 PM
To: Mark Hofman
Subject: Additional documentation referenced in the Snoqualmie Mill DEIS
Attachments: RE: Disputing the Snoqualmie Mill DEIS process; Problems with the May 20 Snoqualmie Mill DEIS online meeting

Categories: Green category

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While reviewing the DEIS for the proposed Snoqualmie Mill PCI Plan, I encountered a portion that refers the reader to a supporting document that does not appear to be available. I identify the missing document below.

I request that this unavailable document be added to the documentation posted on the city website, along with any other such supporting documents that the DEIS depends upon. (It would be sufficient to provide an internet link to supporting documents, as long as the internet location of those documents can be relied upon in the future.)

Since I have not yet had time to read the entire 2,921 pages of the DEIS, I do not know how many other supporting documents are also absent. The authors of the DEIS should have the responsibility to provide a complete DEIS package of documentation, and this example shows that this is not currently the case. I assert that the DEIS is not currently complete, and that the public review period should not begin until the author and/or the city ensures that all referenced supporting documents are accessible to the public. 80-1

The issue that I raise in this email is in addition to the issues that I raised in my previous emails (attached for reference) asserting the invalidity of the current DEIS process.

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065
Phone: 925-786-0078

Identification of missing document:

In Appendix C of the DEIS for the proposed Snoqualmie Mill PCI Plan (file AppendixC_Wetlands_Wildlife_Fisheries_PRINT_2020_0423.pdf, located at https://www.ci.snoqualmie.wa.us/DocumentCenter/View/30869/Mill-Draft-EIS-Appendix-C_Wetlands-Wildlife-Fisheries-2020-04-23-PDF), on page 7, section 2.3.1 *Wetlands* contains this paragraph:

> The area covered by that previous background review for the site includes the portion of the right bank of the Snoqualmie River for our current study to delineate the river OHWM in the vicinity of the proposed stormwater outfall. The results of our background review can be found in our wetland delineation and wildlife reconnaissance report for the property (Raedeke Associates, Inc. 2012).

This paragraph states that information "can be found" in a report by Raedeke Associates. However, that report does not appear to be available among any of the documents provided by the city on the three web pages related to the mill site:

- https://www.ci.snoqualmie.wa.us/393/2068/Mill-Property
- https://www.ci.snoqualmie.wa.us/392/Mill-Planning-Area-Annexation-Implementa
- https://www.ci.snoqualmie.wa.us/520/Mill-Plan-Reference-Documents-2017

I also used the search feature of the city website to look for the word "Raedeke". That search also did not find the referenced 2012 report.

Letter No. 81

Mark Hofman

From: Natalie Williams <natalieibclc@gmail.com>
Sent: Sunday, June 07, 2020 5:52 PM
To: Mark Hofman
Subject: Re: Millpond development

Categories: Green category

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JUN - 7 2020
City of Snoqualmie
Community Development Department

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Thank you for notifying me. I agree the tribe should be consulted and any issues resolved. Possibly protecting more of these sacred spaces.
Thank you,
Natalie Williams

On Sat, Jun 6, 2020, 5:43 PM Mark Hofman <MHofman@snoqualmiewa.gov> wrote:

Update- Notice of Comment Period Extension

Pursuant to a request letter received by the City of Snoqualmie on May 29, 2020 from the project Proponent, Snoqualmie Mill Ventures, LLC, the active 45-day review and comment period on the published Draft Environmental Impact Statement (DEIS) for the Snoqualmie Mill Planned Commercial/Industrial Plan (PCI Plan) is being extended. The attached Notice of Comment Period Extension was published Friday, June 5, 2020.

A Notice of Availability of the DEIS was published on April 27, 2020 for a 45-day review and comment period ending on June 11, 2020. A minimum 30-day review and comment period is required; the proponent prior agreed to the extended 45-day period. This Notice of Comment Period Extension extends the public and agency review and comment period to **11:59 pm, Friday, July 10, 2020** (74 days).

Snoqualmie Mill Ventures, LLC requested that the comment period be extended to July 10, 2020 in consideration of numerous requests made during the May 20, 2020 public meeting inviting oral comment on the DEIS, and to accommodate a specific request made by the Snoqualmie Indian Tribe. In light of the Proponent's request, combined with the requests by members of the public and Snoqualmie Indian Tribe, the DEIS comment deadline is hereby extended.

Thank you.

From: Natalie Williams <natalieibclc@gmail.com>
Sent: Friday, May 1, 2020 10:40 AM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: Re: Millpond development

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I guess my comment goes to
Mill DEIS

On Wed, Apr 29, 2020, 9:13 PM Natalie Williams <natalieibclc@gmail.com> wrote:
Mill Site Development project.

---------- Forwarded message ---------
From: **Natalie Williams** <natalieibclc@gmail.com>
Date: Wed, Apr 29, 2020, 9:10 PM
Subject: Millpond development
To: <mhofman@snoqualmiewa.gov>

For Open Comment Period:
I think anything develped at the Millpond Road should be natural and not block any views. The Snoqualmie Tribe should be consulted and permission/input taken into consideration with design and preserving natural spaces. This will be very sad. I really enjoy the backroads and having natural areas.
Please be very careful. Once destroyed and sold for profit, we can never get this natural space back.
Sincerely,
Natalie Williams

Letter No. 82

Mark Hofman

From: Robin G Gray <rggray1@outlook.com>
Sent: Tuesday, June 09, 2020 5:03 PM
To: Mark Hofman
Subject: Mill Site Commercial/Industrial Plan

Categories: Green category

RECEIVED
JUN - 9 2020
City of Snoqualmie
Community Development Department

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Mr. Hofman,

I am opposed to the Development that is being talked about for the Mill Site.The impact of this development would be terrible for the Snoqualmie Valley. I am wondering if you have ever attempted to travel to 1-90 over the Snoqualmie Parkway during Rush Hours Traffic? Do you live in the Snoqualmie Valley? I am guessing you do not. If you did, you would in no way want a new development built here that will bring in hundreds of cars per day into an area that already cannot handle the current traffic. I have not spoken to one Valley Resident that wants more roads, increased development, and massive more amounts of traffic. If we wanted to live that way, we would have moved to Issaquah, Bellevue or Redmond. 82-1

Aside from that, the Mill Pond area is a beautiful site filled with rich wild life. Can we please leave it alone?

Thank you,
Robin Gray
10826 428th Ave SE
North Bend, WA 98045

Letter No. 83

Mark Hofman

From: Aiko Mizumori-Canfield <aiko.mizumoricanfield@gmail.com>
Sent: Monday, June 15, 2020 9:58 AM
To: Mark Hofman
Subject: Snoqualmie Mill Site and Comments

Categories: Green category

RECEIVED
JUN 15 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman and the City of Snoqualmie,

After reading through the DEIS, and in an effort to combat the erasure so common in our society, I have noted my comments about the Planned construction at the former Snoqualmie mill site.

Too often, histories are forgotten, white-washed, or are lost when stories and legacies are not preserved. To rebuild on this land with no acknowledgement of what came before would do the same thing.

As documented in the EIS assessment done by Cascadia Archeology, prior to 1942 a sizable Japanese Community made this land their home for decades, beginning around 1918. This all changed in 1942 when these families were forced to leave their homes, land, jobs, friends, and possessions in favor of concentration camps in the deserts across the Mountain states of the U.S. At that time, with nowhere else to store their items, they put them in the outhouses, colloquially known as "shit-pits". After the Japanese employees (who made up a majority of the workforce) and their families were removed from the land, their homes (barracks) were raised thus compounding on the forced internment and identity erasure with the literal erasing of their homes and possessions. 83-1

The point of this letter is to request that while doing your evaluating and building, pay tribute to those that were there before, the Salish tribes, the Japanese Mill Workers, and any others. Without your voice and the voices of the rest of the City of Snoqualmie, history and legacies from our predecessors is more likely to be erased, forgotten, or disappear. I'm suggesting a permanent plaque or other display to show the information and stories of the people that came before. A way to show the residents of Snoqualmie, the Salish people, and Japanese American Community that you are actively working to highlight these people and groups rather than working to erase our history.

Aiko Mizumori Canfield
Fourth Generation Japanese American, descendant of EO9066 Incarcerees

Letter No. 84

Mark Hofman

From: Fuzzy FLETCHER <fuzzy653@comcast.net>
Sent: Sunday, June 28, 2020 12:04 PM
To: Mark Hofman
Subject: DEIS comments-Fuzzy fletcher
Attachments: millsite comments - Fuzzy.docx

Importance: High

Categories: Green category

RECEIVED
JUN 28 2020
City of Snoqualmie
Community Development Department

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Mark,
Please find my comments on public services attached. Let me know if it did not come thru as an attachment.
Thank you
Fuzzy

" I am a Free Man, regardless of what set of 'rules' surround me. When I find them tolerable, I tolerate them.
When I find them obnoxious, I ignore them.
I remain free, because I know and understand that I alone bear full responsibility for everything I do, or chose not to do."

June 20, 2020
7749 Maple Ave. SE
Snoqualmie, 98065

Mark Hofman
City of Snoqualmie

Hello Mark,

re: Millsite DEIS

Thank you for the opportunity to comment on this DEIS.

I submit that the current SEPA process for this project is not being handling in accordance with law:

1. The EIS was not completed within the time period required by Snoqualmie Municipal Code. Section 19.04.080(C) of the Snoqualmie Municipal Code states "Environmental impact statements shall be completed within a period to be set by the responsible official not to exceed 180 days, unless the city and the proponent of the action agree in writing to a longer time." Mark Hofman, the SEPA Responsible Official for the City of Snoqualmie, stated in an email dated May 13 2020 "The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant-City agreement to an additional time extension." The Draft EIS for this project has taken approximately three years to create, which is far in excess of the 180 days mandated by the Municipal Code.

84-1

2. Publishing the Draft EIS during the declared State of Emergency is contrary to the Governor's Proclamation 20-28. Proclamation 20-28 (issued March 24 2020, with several extensions, the most recent of which is 20-28.3, dated May 12 2020), states "agencies are further prohibited from taking 'action,' as defined in RCW 42.30.020, unless those matters are necessary and routine matters or are matters necessary to respond to the COVID-19 outbreak".

   Washington State's Attorney General issued guidance to state and local agencies on March 26 2020 regarding how they should understand the meaning of "necessary and routine matters". The main guidance on whether something is "necessary" is to consider whether the action must be done at this time, or if it could wait until later. Since this Draft EIS took approximately three years to produce, I claim that is not **necessary** to have the public review and comment period during the state of emergency. It could wait until the state of emergency has ended.

   The Attorney General's guidance on whether something is "routine" provides questions that an agency should ask itself when deciding that a matter should **not** be considered

"routine". That questions are: "Is the reason for meeting on the matter unusual, special, and/or expected to be controversial and for which there will be a high public interest? Is this an exceptional or unique new project we want to launch? Is this an 'out of the ordinary' matter?" The public review and comment for the Draft EIS absolutely matches the public review and comment for the Draft EIS, in every single point that the Attorney General's questions ask.

Further, the Municipal Research and Services Center (MRSC) advises local governments "Consistent with the Attorney General's guidance, we suggest you limit agenda items to areas such as approving payroll and other vouchers, approval of minutes of previous meetings, and other matters that cannot wait until you can provide a physical location where the public can attend." The MRSC also advises that the Governor's proclamations "provide a legal basis for an agency to postpone or continue" land use matters. 84-1

Because of these two clear violations of state and local law, I call for the Draft EIS to be withdrawn by the city. To remedy the violation of the Governor's proclamation 20-28, the city might re-issue the Draft EIS after the state of emergency has ended.

Comments on Public Services:

PUBLIC SERVICES

The public services discussed in this section include police, fire, and schools. The providers of these services to the Snoqualmie Mill site include the Snoqualmie Police Department, Snoqualmie Fire Department, and the Snoqualmie Valley School District, as seen in Exhibit 3.14-1. The Study Area for public services consists of the Snoqualmie Mill site and city limits; the Police Department and School District also serve areas outside the city limits. This analysis is primarily based on 1) interviews with Snoqualmie City police and fire officials responsible for providing public services, and 2) a review of relevant City and School District plans and studies.

Exhibit 3.14-1. Summary of Snoqualmie Public Services

Service	Provider
Police	City of Snoqualmie Police Department (SPD)
Fire	City of Snoqualmie Fire Department (SFD)
Schools	Snoqualmie Valley School District (SVSD)

Source: City of Snoqualmie, 2017; BERK, 2017.

It should be noted that the Fiscal Impact section of the EIS (Section 3.15) was coordinated with the analysis of Public Services. The Fiscal analysis discusses potential impacts to other City departments, including Finance and Administration, which could be affected by the proposed PCI Plan. It was determined that any impact was likely to be incremental, marginal and not significant. Please refer to the discussion in Section 3.15.

3.14.1. Affected Environment

Police

Existing Service

The Snoqualmie Police Department (SPD) provides policing services and other services to the entire City of Snoqualmie and the City of North Bend, except for the Snoqualmie Casino. SPD is also a member of the Coalition of Small Police Agencies, a task force of regional agencies who cooperate on policing matters and combine resources. This Coalition uses combined resources that can be provided for crowd control, special events, and other services, as well as providing shared equipment. Dispatch and jail service are provided to the City through a contract with the Issaquah Police Department, and inmate management services are contracted with Issaquah as well as King County. SPD also coordinates and assists the Echo Glen Children's Center as needed.

Comment: The Coalition is not a replacement nor an alternative for SPD policing. The Coalition helps and was developed to share policing capabilities, such as one department has a K-9 unit, one has a bomb unit, etc. This coalition cannot be counted on nor expected to fill in for SPD services being provided to the City of Snoqualmie. 84-2

SPD has one facility located in the Snoqualmie Ridge Marketplace area, located at 34825 SE Douglas St. This is approximately 3 miles from the Proposal via a direct drive.[34]

SPD follows a "no call too small" policy, where every incident will receive a police officer visit and a formal report will be written. In 2016, the year with recent full available data, 6,188 calls to SPD were made as seen in Exhibit 3.14-2. In prior years, SPD was responsible for calls to the Snoqualmie Casino, but no longer serves that property.

Exhibit 3.14-2. Annual Calls for Service

Population 2016	Employment 2016	Number of Calls for Service 2016
13,110	3,608	6,188

Source: City of Snoqualmie, 2018; State of Washington Office of Financial Management (OFM), 2018; BERK, 2018.

Calls for service by time of day can be seen in Exhibit 3.14-3. There are more daytime calls for service than nighttime calls. SPD has indicated that it is reasonable to assume that calls that occur during the daytime are primarily related to commercial activity and calls that occur during the evening are primarily related to residential activity (Pers. Com. SPD Police Captain N. Almquist, 2018). This is based on what is considered a typical schedule for a worker and resident. For a typical schedule, daytime activities occur primarily at work and evening activities primarily occur at home. Over time SPD may wish to capture call data with more specifics on the location to understand the demand for service by residential or commercial activity.

Comment: This date shall be captured prior to the further consideration on any land use or building projects. Data is desired and needed now not at some time in the future. 84-3

More officers sooner. This EIS states one officer and equipment in 2025. This will not help the LOS now!. IF the city cannot find its way to provide another officer and equipment at the beginning of the project and another in 2025, at full cost to the developer, then the developer shall provide night security to safe guard all building equipment and materials while on site in the city of Snoqualmie. There was a need for security on site for the majority of build time on Snoqualmie Ridge and thefts have increased in the city since that time.

This EIS should include SPD calls with many more specifics

Exhibit 3.14-3. Calls for Service by Time of Day

Time of Day	Calls for Service
Daytime (7a-6p)	3,590
Nighttime (6p-7a)	2,582
Total	6,172

Note: The data for total calls for service and the total calls for service by time of day have a small difference.
Source: Pers. Com. SPD Police Captain N. Almquist, 2018.

For purposes of EIS analysis, however, calls for service data cannot be easily categorized by commercial or residential demand or by time of day.

Exhibit 3.14-4 provides 2016 crime data for the city limits. Offenses and arrests are reported by the Washington Association of

Sheriffs and Police Chiefs (WASPC) and tracked by the National Incident-Based Reporting System (NIBRS). The reported crime rate in Snoqualmie was 37.1 offenses per 1,000 people, compared to 67.5 for Washington State, meaning Snoqualmie has a

» The distance between the Snoqualmie Police Department and the Snoqualmie Water Department is 2.6 miles. The Snoqualmie Water Department location at 38194 SE Sterns Rd would be the closest entry to the proposed Snoqualmie Mill area. The Google Maps path of travel would be using Snoqualmie Parkway to connect to WA-202 (Railroad Ave) and to cross the bridge over the Snoqualmie River. Past the bridge a vehicle would turn to SE Stearns Road where they would have potential access to the site from a vehicle.

relatively low crime rate. This crime rate considers Group A offenses, which are designated as incident offenses and include offenses such as assault, burglary, destruction of property, drug/narcotic offenses, and other similar offenses. Group A offenses are not required to have an arrest to be reported in the NIBRS. Group B offenses, designated as arrest offenses, includes disorderly conduct, driving under the influence, trespassing, and other similar offenses. Based on these designations, Group A crimes create active caseload work for officers, while Group B offenses requires an arrest to be reported.

The estimated caseload for each officer is 7.1 per year based on the number of arrests in the city. Caseload alone does not consider the full workload of officers, who also respond to calls for service that don't result in reported crimes, nor does it show Group B offenses that result in arrests for incidents.

Exhibit 3.14-4. **Crime Reports and Arrests, 2016**

Reported Number of Officers	Offenses	Crime Rate	Arrests	Caseload Per Officer
15	486	37.1	106	7.1

Source: City of Snoqualmie Adopted Budget Worksheet, 2017-2018; WASPC NIBRS, 2017; WA Office of Financial Management (OFM), 2017; BERK, 2017.

The 486 reported offenses included 61 crimes against persons (principally simple assault), 373 crimes against property (primarily theft and larceny), and 52 crimes against society (mostly drug offenses). About 40% of reported offenses in Snoqualmie were larceny related.

SPD has 19.8 full-time equivalent (FTE) employees, including 15 operations officers, with 3.8 administrative staff and 1 school resource officer.[35] The City also has an interlocal agreement with the City of North Bend lasting through at least March 2019, where SPD hires additional officers and administrative support to provide a minimum number of officers on duty within North Bend city limits. This contract is not reflected in the number of FTE employees seen in Exhibit 3.14-5.

[35] Source: City of Snoqualmie 2017-2018 Adopted Budget Worksheet.

Exhibit 3.14-5. Police Department Staffing Levels, 2017-18

Position	FTE Employees
Administrative	3.8
Operations	15
School Resources Officer	1
Total	19.8

Source: City of Snoqualmie Adopted Budget Worksheet, 2017-2018; BERK, 2017.

An inventory of police equipment is shown in Exhibit *3.14-6*. The Snoqualmie Comprehensive Plan Capital Facilities Element anticipates an expansion of the existing police station after *2020* with a specific timing to be determined through a planning process. The *2015-2020* Capital Improvement/Facilities Plan identifies unfunded projects including a building security fence, covered patrol vehicle parking, and a vehicle charging station.

Exhibit 3.14-6. Police Equipment Inventory and Facilities

Inventory Item	Details
Police Station	34825 SE Douglas Street 16,906 Square Feet 21 personal capacity 2047 estimated replacement year
6 Patrol Vehicles	5-year rotational replacement schedule
4 North Bend Patrol Vehicles	
1 Jail Transport Vehicle	
2 Supervisory/Patrol Vehicles	

Source: City of Snoqualmie Comprehensive Plan, 2014; BERK,

2017. *Level of Service Standards*

The City's *2014* Comprehensive Plan established police department staffing level of service (LOS) guidelines. The City established an "officers on duty" and response time guideline, rather than a per-capita standard. The City prefers this approach because per-capita standards do not consider the effectiveness of the officers and other workload considerations.

Exhibit 3.14-7. Police Department Level of Service Guidelines

LOS Guidelines	Performance
The department standard is that staff and equipment should be sufficient to maintain a minimum of two officers on-duty at all times within the city.	Met
It should also provide staff and equipment sufficient to respond to priority calls within five minutes 90% of the time.	Staffing allows sufficient response. Response time data in Exhibit 3.14-8 is between 5:32 and 6:42 minutes, but the response time 90% of the time is unknown.

Source: City of Snoqualmie Comprehensive Plan, 2014; BERK, 2017.

Exhibit 3.14-8 shows the performance measure for SPD's response to priority calls. SPD has three levels of priority calls. Priority 1 calls require an officer response but are not considered urgent; the Priority 1 calls include reports of theft, fraud, and other similar calls. Priority 2 calls require an elevated response by the officer, and includes calls for suspicious persons/activities, missing children, and others. Priority 3 calls require the most urgency in an officer's response, and includes calls for in-progress assault, domestic violence, traffic collisions where injuries occur, and other similar calls.

Exhibit 3.14-8. Average Response Times for Calls by Prioritization: 2016

Response Priority	Average Response Time
Priority 1	6:42
Priority 2	6:18
Priority 3	5:32

Source: City of Snoqualmie Police Department, Data Request by BERK, 2017.

The City of Snoqualmie has a minimum level of service of two on-duty officers, which it has met. While the City does not use a per capita LOS standard, Exhibit 3.14-9 calculates an effective level of service for the number of officers per 1,000 population, which is a commonly accepted LOS. Jurisdictions adopt different standards, depending on the level that each community needs, desires and will accept, ranging from 1-3 per capita. A "west coast" level of service standard is around 1.1 to 1.2 officers per 1,000; some cities on the east coast have as many as 3 officers per 1,000.[36]

Exhibit 3.14-9. Police Department Effective Level of Service, 2016 and 2017

Year	Number of Officers	Population	Officers per 1,000 Residents
2016	12	13,110	0.92
2017	15	13,210	1.14

Source: City of Snoqualmie Adopted Budget Worksheet, 2017-2018; Washington State OFM, 2017; BERK, 2017.

The Snoqualmie Mill proposal is primarily a jobs-based project; thus, an effective level of service standard based on population does not fully estimate the potential service demand for the Snoqualmie Police Department. The relationship of residential and commercial calls for service is unclear in SPD data.

Comment: Make SPD data clear before moving along with this or any permit process involving need for data or questions about data. Since it is unclear make it clear!

84-4

Special Events

The Snoqualmie Police Department also provides services for reviewing permits on public property related to public safety. Permits are required for certain special events, which involves other regulations and standards that the SPD is responsible for. See further discussion under Impacts.

[36] Personal Communications with Police Captain N. Almquist, 2017.

Fire

Existing Service

The Snoqualmie Fire Department (SFD) provides fire services, emergency management services, propertyManagement, which prepares the City to be able to mitigate natural and manmade disasters.

SFD partners with other organizations to provide services. SFD provides medical service to Echo Glen Children's Center and has an interlocal agreement with King County Fire Protection Districts #27 and #45 for shared staffing and resources to reduce overtime demand. The City is also part of a mutual aid agreement that allows for the sharing of resources throughout King County. Advanced Life Support (ALS) services are provided by King County Emergency Management Services, and fire dispatch services are contracted through North East King County Regional Public Safety Communication Agency (NORCOM). SFD no longer is contracted to provide fire and EMS response to the Snoqualmie Casino.[37]

SFD and other fire management organizations are in discussions to share equipment, which could affect SFD's ability to respond to calls. SFD is currently undergoing a community risk assessment, which identifies and assesses risks that an organization would be exposed to.

Comments: The developer is bringing a 5 dtory building and much more warehouse and residential housing. There is inadequate fire surpression equipment to reach taller buildings. The developer at their sole expense shall provide one ladder truck and two firefighters along with other needed training for firefighters to operate said equipment prior to the building of any building or improvement to said development.

84-5

SFD has one facility located across from the Kimball Creek Village area, located at 38180 Southeast Mill Pond Road. This is approximately 1.9 miles from the study area via a direct drive.[38] SFD is looking at the option of moving its fire station in the future or considering a second station if necessary.

In 2016, SFD received 1,030 calls for service, while the fire chief estimates that their current saturation point for calls is about 1,600.[39,40] Exhibit 3.14-10 shows the number of calls SFD received by category. Overall, about 50% of calls were for residential occupancies, and about 20% of calls were for commercial occupancies. Of the 266 "other" calls for service, 150 calls were to roadways. The remainder of "other" calls is comprised of open space areas, schools, or government buildings.

[37] City of Snoqualmie Comprehensive Plan, 2014, Personal Communications with Fire Chief M. Correira, 2017.
[38] The distance between the Snoqualmie Fire Department and the Snoqualmie Water Department is 1.9 miles. The Snoqualmie Water Department location at 38194 SE Sterns Rd would be the closest entry to the proposed Snoqualmie Mill area. The Google Maps path of travel would be using Snoqualmie Parkway to connect to WA-202 (Railroad Ave) and to cross the bridge over the Snoqualmie River. Past the bridge a vehicle would turn to SE Stearns Road where they would have potential access to the site from a vehicle.
[39] Personal Communications with Fire Chief M. Correira, 2017.
[40] A March 2018 report on the potential for consolidation of SFD and Fire District 27 indicates the City's incident volume was 1,209, presumably for the year 2017. This is still below the saturation point for calls. More detailed data by type of land use is not presented. (Fire Services Consolidation Exploration, March 31, 2018, available: https://www.ci.snoqualmie.wa.us/DocumentCenter/View/20207/Snoqualmie-and-Fall-City-Fire-Scoping-Report-03-2018-PDF.)

Exhibit 3.14-10. Snoqualmie Fire Department Annual Calls for Service, 2016

Category	Number of Calls
Residential	514
Commercial	199
Other	266
Total	1,030

Source: Personal Communication with Snoqualmie Fire Chief M. Correira, City of Snoqualmie 2017; BERK, 2017.

As of 2017, SFD has 20.5 FTEs, and about 20 volunteers (with a goal of 25 volunteers) as shown in Exhibit 3.14-11. Of the 20.5 FTE employees, 13 are in roles that involve active firefighting (the fire chief, lieutenants, and firefighters).41,42

Exhibit 3.14-11. Fire Department Staffing Levels, 2017

Position	FTE Employees
Paid Staff	20.5
Volunteers	20 (fluctuates)
Emergency Management	1

Source: City of Snoqualmie Adopted Budget Worksheet, 2017-2018; Personal Communications with Fire Chief M. Correira, BERK, 2017.

An inventory of SFD equipment and facilities is shown in Exhibit 3.14-12. The 2015-2020 Capital Improvement/Facilities Plan identified an unfunded 220-volt vehicle charging station.

Exhibit 3.14-12. Fire Department Equipment Inventory and Facilities

Inventory Item	Details
Fire Station	7600 SE Snoqualmie Parkway 17,360 SF 36-40 FTE capacity 2055 estimated replacement year
2 Basic Life Support Units (BLS)	
2 Command Vehicles	
Main Fire Engine	
Reserve Fire Engine	

Source: City of Snoqualmie Comprehensive Plan, 2014; BERK, 2017.

Comment: Where is the needed ladder truck, firefighters and training??????

[xi] The Fiscal analysis indicates 2016 FTEs of 19.5: 1 chief, 3 lieutenants, and 8 firefighters. The analysis also notes 1 additional firefighter was added in year 2017.
[xii] City of Snoqualmie Adopted Budget Worksheet, 2017-2018.

Level of Service Standards

The City's *2014* Comprehensive Plan established SFD LOS standards for staffing and equipment for fire suppression, as well as response and travel time standards based on *RCW 35.103,* which contains performance standards related to fire suppression operations. This state law does not limit or modify the authority of local governments to set levels of service but does require fire service providers to establish performance objectives related to turnout time and response time that must be met *90%* of the time. The SFD level of service standards and performance can be seen in Exhibit *3.14-13.*

The last year that the SFD reported on its performance objectives was in *2013,* and more recent reports are still being prepared.[43] In *2013* SFD had an average response time for all calls of *6:59* minutes. It was noted that response average includes calls to the Snoqualmie Casino based on previous contractual service. The casino accounted for *24%* of service calls with an average response time of *6:49* minutes. Calls to the casino are no longer part of the SFD workload.

Comments: Why are we using data that is this outdated? The city of Snoqualmie has grown significantly and there is not enough data to move forward on this development

84-6

Exhibit 3.14-13. Fire Department Level of Service Standards

LOS Standard	Performance
Staffing and equipment sufficient to maintain a minimum of 3 fire-suppression trained individuals on-duty at all times within the City.	Met
Turnout time: 90 seconds. To be met 90% of the time.	Under review by SFD
Response/travel time: 8.5 minutes for arrival of the first engine company at a fire suppression incident. To be met 90% of the time.	Under review by SFD
Response/travel time: 6.5 minutes for the arrival of a first responder unit to an emergency medical incident. To be met 90% of the time.	Under review by SFD
Response/travel time: 15.5 minutes for the arrival of a full 1st alarm response at a fire suppression incident. To be met 90% of the time.	Under review by SFD

Source: City of Snoqualmie Comprehensive Plan, 2014; Fire Department Annual Report, 2013; BERK, 2017.

SFD has a minimum level of service of three on-duty firefighters. The City does not use a per capita LOS standard, and response time data does not exist. Therefore, for the purposes of this EIS, Exhibit *3.14-14* calculates an effective, de facto level of service regarding the number of firefighters per population.

Exhibit 3.14-14. Fire Department Effective Level of Service, 2016 and 2017

Year	Number of Firefighters	Population	Firefighters Per 1,000 Residents
2016	13	13,110	0.99
2017	13	13,210	0.98

Source: City of Snoqualmie Adopted Budget Worksheet, 2017-2018; BERK, 2017.

Because the Snoqualmie Mill proposal is primarily a jobs-based project, an effective level of

[43] Personal Communication with Snoqualmie Fire Department Administrative Assistant, 2017.

service standard based on population does not fully estimate the potential service demand for SFD services. However, residential population is typically a better indicator of service demand than employment, because commercial and industrial developments typically generate fewer calls for service. As shown in Exhibit 3.14-10, most calls for service currently come from developments with residential occupancy.

Special Events

The SFD also reviews permits on public property related to public safety. Permits are required for certain special events, which has other regulations and standards that the SFD is responsible for. See further discussion of special use permits under Impacts.

Schools

Existing Service

Public education is provided to the City of Snoqualmie by the Snoqualmie Valley School District (SVSD). The district serves approximately 400 square miles, including the cities of Snoqualmie and North Bend, and the Fall City community. SVSD provides educational services to 7,165 students as of fall 2018. The district operates 11 schools, 7 of which serve the City of Snoqualmie, as seen in Exhibit 3.14-15. SVSD plans for growth accommodation and its future development in its Capital Facilities Plan (2018-23) and Strategic Plan (2017-18).

Exhibit 3.14-15. Snoqualmie Valley School District Schools Serving Snoqualmie Students

School	Grade Span	Address
Cascade View Elementary School	K - 5	34816 SE Ridge St Snoqualmie, WA
Snoqualmie Elementary School	Pre-K, K - 5	39801 SE Park Street Snoqualmie, WA
Timber Ridge Elementary School	K - 5	34412 SE Swenson Drive Snoqualmie, WA
Chief Kanim Middle School	6 - 8	32627 SE Redmond-Fall City Rd Fall City, WA
Twin Falls Middle School	6 - 8	46910 SE Middle Fork Rd North Bend, WA
Mount Si High School & Freshman Campus	9 – 12 9 (freshman campus)	*Main Campus* 8651 Meadowbrook Way SE Snoqualmie, WA *Freshman Campus* 9200 Railroad Ave SE Snoqualmie, WA
Two Rivers (alternative school)	7 - 12	330 Ballarat North Bend, WA

Source: State of Washington Office of Superintendent of Public Instruction, 2017; BERK, 2017.

Level of Service Standards

The City of Snoqualmie does not set LOS standards for schools, instead the Snoqualmie Valley School District establishes a "standard of service" in compliance with SMC 20.10 (and King County Code 21A.06.1225 and 21A.043), for the purposes of establishing school impact fees. The district sets a target average student to teacher ratio for each school level.

Standard of Service for Elementary Students

- **Average target class size for grades K – 2: 17 students**
- **Average target class size for grade 3: 17 students**
- **Average target class size for grades 4-5: 27 students**
- **Special Education for students with disabilities may be provided in a self-contained classroom. Average target class size: 12 students**

Standard of Service for Secondary Students

- **Average target class size for grades 6-8: 27 students**
- **Average target class size for grades 9-12: 29 students**
- **Average target class size for Two Rivers School: 20 students**
- **Special Education for students with disabilities may be provided in a self-contained classroom. Average target class size: 12 students**

The district calculates the demand for services, and ultimately the school impact fee assessed on new residential development, based on a per dwelling unit student generation factor identified in the six-year capital facilities plan.

The SVSD facilities do not currently have sufficient permanent capacity for its student enrollment. The District's current overall capacity after consideration for smaller class sizes in grades K-3 is 7,182 students (5,170 in permanent classrooms and 2,012 in portable classrooms). The district meets the current deficit in capacity through relocatable temporary portables (about 28% of the district's capacity comes from portables).

A portion of these capacity needs are currently being addressed. SVSD opened Timber Ridge Elementary School in 2016. SVSD also increased permanent capacity with the Mount Si High School expansion under construction should open fall 2019. The high school expansion will allow the current Mount Si freshman campus available to be converted back into a middle school.

3.14.2. Impacts

Impacts of Proposal

Year-Round Service Demand

Impacts to public services will result from increased demand directly and indirectly generated by residential and employment growth associated with the Snoqualmie Mill PCI Plan. Indirect impacts could include a higher level of activity in the area due to attractions that bring visitors into the area.

84-7

Comment: change word "could" to "will"

Methodology

To help assess what impacts would occur because of the proposal or alternatives, City of Snoqualmie public service providers were interviewed, and City plans and studies were consulted.

The adopted LOS and City suggested methods for each provider were applied to assess impacts. Following are definitions of terms used in discussion of the impacts section.

- **Direct impacts:** Growth and activity that occurs directly related to the proposal. Impacts occur due to the growth in employment and residences in Snoqualmie Mill.
- **Indirect impacts:** Growth and activity that may occur is not directly attributable to the Snoqualmie Mill proposal. Direct growth in Snoqualmie Mill site may influence the type/mix of development or activity (such as tourism) elsewhere in the city. Indirect demand cannot be accurately quantified for purposes of estimating public service demands.
- **Cumulative effects:** Are the overall effects of the proposal, including direct and indirect impacts, along with future baseline growth.
- **Future baseline growth:** Growth assumed under the updated 2015 Comprehensive Plan for the city without the PCI Plan; this is intended to help distinguish the PCI plan from background growth. Future baseline growth is shown under the Assumptions section in Exhibit 3.14-16.

Assumptions

The PCI Plan mix of uses, building space and phases of development are described in Chapter 2. The proposal includes restaurants, specialty retail stores, an indoor event space, and residential units in up-to 5-story mixed-use buildings, but the project will emphasize light industrial and warehouse space, and office space in later phases of development.

The projected population and employment growth are seen in Exhibit 3.14-16, and would affect day-to-day police, fire, and school services. However, there are also likely additional indirect police and fire service demands related to visitors that would be attracted to the study area when **developed.**

Comments: prepare and require developer offsets PRIOR to developer or concuerntly with developing, NOT when developed

84-8

Exhibit 3.14-16. Projected Population and Employment by Alternative

PCI Plan Buildout		PCI Plan Phase 1 2023	Redevelopment Alternative Buildout	Redevelopment Alternative Phase 1 2023	No Action
Residential Units	160	160	120	120	0
Projected Population	304	304	228	228	0
Projected Employees	3,410	510	1,570	520	0

Source: ECONorthwest, 2018.

Future baseline conditions are shown in Exhibit 3.14-17 below based on the Comprehensive Plan. This citywide growth by 2032 is illustrated with and without the PCI Plan and Alternative 1. The 2014 Comprehensive Plan assumed 872 jobs, which is 26% of jobs planned by the

Proposal and 56% of the jobs for the Redevelopment Alternative. For simplicity, this EIS compares demand for public services under the future baseline excluding the 872 jobs on-site compared with implementation of the PCI Plan and the Redevelopment Alternative.

Exhibit 3.14-17. Snoqualmie Future Baseline Growth with and Without PCI Plan and Alternatives

	Residential Units	Population*	Employees
Comprehensive Plan Total 2032**	5,887	15,552	5,735
Snoqualmie Mill Total in Comprehensive Plan 2032	-	-	872
Future Baseline with PCI Plan: 2032	**6,047**	**15,856**	**8,273**
PCI Plan Growth Full Build	160	304	3,410
Mill as % of Future Baseline	**3%**	**2%**	**41%**
Future Baseline and PCI Plan Phase 1: 2023	*6,047*	*15,856*	*5,373*
PCI Plan Growth 2023	160	304	510
Mill as % of Future Baseline	3%	2%	9%
Future Baseline with Redevelopment Alternative: 2023 & 2032	**6,007**	**15,780**	**6,433**
Alternative Growth Full Build	120	228	1,570
Mill as % of Future Baseline	**2%**	**1%**	**24%**
Growth 2023	120	228	520
Mill as % of Future Baseline	**2%**	**1%**	**8%**

*Population is from the 2015 Comprehensive Plan Update, assuming medium projections. The Comprehensive Plan assumed 2.5-3 residents per housing unit.
**The Comprehensive Plan assumed a housing unit net growth of 2,126, population net growth of 2,702, and a net employment growth of 2,733 by 2032.
*** This table shows total units by 2032. The Comprehensive Plan assumed a net increase of 2,126 dwellings between 2010-2032. Between 2010-2017 696 single family units were produced and 151 multi-family units. The expected net future baseline 2017-2032 for single family units is 871 and multifamily units is 402.
Source: BERK, 2019.

The impact analysis for each EIS alternative applies City or district adopted or effective LOS to the projected population or housing growth. However, the analysis is challenging for the overall PCI Plan and Phase I proposals for two reasons:

- the LOS projections are based on per capita/resident demand, but the proposal will result in greater employment than population growth, which is not captured completely by either the adopted or effective levels of service; and
- the proposal will indirectly generate and/or capture some activity from regional tourism and special events, but this activity cannot be accurately quantified. Some of the tourism related activity may reflect visitors who would visit Snoqualmie independent of the proposal, so it is not clear that any impact resulting from these visits is directly or uniquely attributable to the proposal.

These caveats should be applied when interpreting the subsequent impact analyses.

Periodic Special Events

Per the Pre-Annexation Agreement and Post-Annexation Implementation Plan, special event permits are restricted to a maximum of two events annually, up to two days in duration each. Currently, the City defines special events as occurring on public right-of-way or parks (for more than 30 people).[44] As such, special events for future onsite retail, restaurants, or wineries under the Proposal or the Redevelopment Alternative, or event centers or outdoor performance space are not anticipated to require Snoqualmie special event permits because on-site roads and open space would be private. However, the Snoqualmie Police and Fire Departments have identified potential effects on operations due to special events and resulting traffic impacts as concerns.

From interviews with Snoqualmie service providers, officials noted that events with and without permits would need to be considered for their impacts on demand for public services.

- **Allowed Permitted events.** These events would be regulated when triggered by the city's thresholds for Special Events and permitting requirement.
- **Allowed Non-permitted events.** These events would not trigger the city permitting requirements. They could be general events and activities under the City's thresholds, or that are approved along with the proposal in agreement with the Post-Annexation Implementation Plan.

An example of a large event that would not trigger a permit could be events that occur within private event centers, where service providers may still have an interest in the event. Most large non-permitted events would likely have private security. SPD has stated than an officer or two being present for large events is preferred. These officers would usually be in parking lots, to maintain a presence and connection to the community.

PCI Plan

The PCI Plan would increase the number of residents and employees in the Snoqualmie Mill site, adding 160 dwellings, 304 persons, and 3,410 jobs.

The proposal would also provide for retail establishments, such as wine bars, restaurants, and specialty retail, and for winemaking including on-site tasting rooms/retail. An indoor event space would also be developed. These types of uses could create demand for special events that act as an attraction to the area, which may create temporarily higher peaks of demand.

Police

Direct Impacts

The proposal development will create direct demand for day-to-day activities and special events in the area. The presence of more residents and employees means there could be more

Comments: Change word "could to "Will

84-9

[44] SMC Chapter 12.20.

calls for police service.

About 0.35 full-time equivalent (FTE) staff would be needed to maintain SPD's current effective/de-facto level of service of officers per thousand residents, seen in Exhibit 3.14-18. However, interviews with the SPD have indicated that at least 1.0 FTE would be needed to serve the expected growth in population and employment. (Personal Communications with Police Captain N. Almquist, 2017)

Exhibit 3.14-18. Police Service Provider Level of Service and Needs 2023-PCI Plan

Effective LOS	1.14 Officers per 1,000 residents
PCI Plan Population 2023	304
PCI Plan: Demand 2023	0.35
% of current FTEs at 2023	2%

Source: BERK, 2018.

Proposed commercial, winery, and entertainment uses, primarily in Phase I of the PCI Plan, would also attract visitors to the site and could also increase calls for service, including on evenings or weekends.

Comments: Who is going to pay for the increase? Or will current residents have to wait for a cop because they are busy working for the tourists brought by the developer. SPD cannot rely on small forces coalition to help.

84-10

City regulations require special event permits only for events on public properties or rights-of-way, which is not anticipated to be applicable to the Snoqualmie Mill site itself, which is a private property and will have private roads. Currently, SPD already has difficulty staffing large events. Snoqualmie uses the Coalition of Small Police Agencies to support staffing for large events.

Indirect and Cumulative Impacts

It is expected that most demand for public services would occur from citywide population growth, where based on population an additional 2.79 officers would be needed by 2032, or 3.14 more officers cumulatively with the PCI Plan. The demand by the PCI Plan would be 11% of the expected officers needed if considering only the on-site residential uses; see Exhibit 3.14-18. If 1.0 officers were added per SPD estimates of demand from the PCI Plan including employees, that would represent about 26% of the future officers added for citywide growth.

Exhibit 3.14-19. Police Service Provider Level of Service and Needs 2032 -Future Baseline and PCI Plan

Effective LOS	1.14 Officers per 1,000 residents
Future Baseline Population 2032	15,552
Future Baseline no PCI Plan: Demand 2032	17.79
Future Baseline + PCI Plan: Demand 2032	18.14
Net Future Baseline: Demand 2032	3.14
% of net Future Baseline 2032	11%

Source: BERK, 2018.

Interviews with SPD staff suggested that the roundabout on 18th and the Meadowbrook bridge

may currently be at capacity which in turn may impede the police from maintaining their LOS response times. Additional trips on this route from full buildout of the PCI Plan may also incrementally add to congestion. For an analysis of traffic conditions and recommended mitigation measures please see Section 3.11 of the Draft EIS.

Fire

Direct Impacts

SFD achieved its three-person minimum on-duty firefighter standard in 2016. At buildout of the PCI Plan, there would be a need for 0.30 FTE to maintain the effective level of service of firefighters per thousand residents. See Exhibit 3.14-20. However, the department currently has excess staff capacity since it no longer serves the casino; therefore, the current number of firefighters is expected to be adequate for the PCI Plan.

Comment: Where and when does the developer pay for a ladder truck? 84-11

Exhibit 3.14-20. Fire Service Provider Level of Service and Needs -PCI Plan

Effective LOS	0.98 Firefighters per 1,000 residents
PCI Plan Population 2023	304
PCI Plan: Demand 2023	0-0.30
Future Baseline Population 2032	15,552
Future Baseline no Master Plan: Demand 2032	15.30
Future Baseline + Master Plan: Demand 2032	15.30-15.60
Net Future Baseline: Demand 2032	2.30-2.60
Master Plan % of net Future Baseline 2032	0-11%

Source: BERK, 2018.

The demand for fire code permit review and code inspections is expected to increase due to development. However, based on interviewing staff at the City of Woodinville in November 2017, the workload for wineries and distilleries is comparable to other commercial businesses. According to International Building Codes, distilleries may require more stringent code standards if they exceed allowable quantities of hazardous materials. Depending on the type of commercial, industrial, or manufacturing development, inspections could be required by the SFD if hazardous materials are stored.

SFD would be involved in the special events permit process for public events in the right-of-way or on public properties, which is not anticipated to be applicable to the site itself as a private property with private roads. With some private onsite special events, building and fire code provisions could apply to temporary structures that may be established, such as tents for outdoor events.

Indirect and Cumulative Impacts

It is expected that most demand for fire services would occur from citywide residential and employment growth, and relatively less from activity in the study area. Residential

development in the PCI Plan would represent 3% of the future baseline demand of residential growth in the city as a whole; see Exhibit 3.14-20. As noted previously, and as shown in Exhibit 3.14-10, residential population is typically a better indicator of service demand than employment, because commercial and industrial developments typically generate fewer calls for service.

Traffic congestion and response times effects are anticipated to be similar for the SFD as described for the SPD. For an analysis of traffic conditions and mitigation measures please see Section 3.11.

School

Direct Impacts

The SVSD student generation rates, shown in Exhibit 3.14-21, were used to estimate the number of new students that would result from the PCI Plan. As new residents move into the Snoqualmie Mill multifamily housing, some may have children that would attend SVSD schools; based on multifamily student generation estimates, only about 28 students are anticipated due to the PCI Plan.

Exhibit 3.14-21. Projected Students Generated and Capacity Need – PCI Plan

Schools and Student Generation Rates PCI Plan 2023			Net Future Baseline 2032				Net Future Baseline w/ PCI Plan 2032	
School Level	Single Family Rates	Multi-family Rates	Single Family New Students	Multi-family New Students	Single Family New Students	Multi-family New Students	Single Family New Students	Multi-family New Students
Elementary	0.39	0.089	0	14	340	36	340	50
Middle School	0.169	0.042	0	7	147	17	147	24
High School	0.198	0.045	0	7	172	18	172	25
Total	0.685	0.175	0	28	659	71	340	50
Grand Total			**28**		**730**		**758**	

Source: Snoqualmie Valley School District Capital Facilities Plan, 2019; BERK, 2019.
Note: totals don't correspond due to rounding.

Indirect and Cumulative Impacts

Growth under the future baseline (without the PCI Plan) would potentially generate 730 students. The PCI Plan would contribute 28 students, bringing citywide student growth by 2032 to 758. The PCI Plan would incrementally add 4% to the net future baseline students.

Visitors to the site would not affect school services. No indirect impacts are anticipated.

Planning Area 1

Planning Area 1 is the first phase of development in the PCI Plan. See Chapter 2 and Exhibit 3.14-16 for development assumptions. Planning Area 1 would contain 160 dwellings with an estimated population of 304 persons. Employment uses would generate about 510 employees. The area is proposed to be developed as a pedestrian-oriented village center, containing a mix of industrial and warehouse uses, retail, and all the residential units for the site.

Planning Area 1 is focused on attracting tenants who would make and store wine, and other retailers. The area is expected attract restaurant uses, tasting rooms, and specialty retail. This residential and business development would increase the demand for public services.

Police and Fire Service Impacts

Phase 1 impacts would be similar to the full the PCI Plan since all residential growth would occur in Phase 1. The demand for police staff would equal 0.35 FTE as with the PCI Plan at buildout. SPD has indicated the potential need for 1.0 FTE for the PCI Plan in view of the large number of jobs projected (3,410); since Phase 1 would only have 510 employees, a full FTE may not be needed for that phase.

Comment: It shall be required PRIOR to any building and or prior to any events

84-12

With the same number of residential units in Phase 1 as the PCI Plan at buildout, about 0.30 FTE would be needed to retain the same effective firefighter ratio as today, but the SFD has indicated that the department has excess capacity and additional staff may not be needed. There would be a need for fire code review of Phase I development though the extent of review would be less than the PCI Plan as a whole.

Special events in Planning Area 1 are expected to occur in the events center; since they would be located on private land and served by private roads, these events would not require special event permits under currently adopted regulations. However, events that are planned to take place in the public right-of-way would require special event permits from the City. Any larger temporary structures, such as tents, could be subject to building and fire code review.

During development and with ongoing business operations, the workload required by each department may vary. The SFD may require annual inspections for each winery or potential distilleries if located in the area and if subject to more stringent code due to the presence of flammable substances.

Schools

All PCI Plan residential development would occur in Planning Area 1 and would generate 28 students; this would have the same cumulative impacts to school services noted previously for the PCI Plan at buildout. No indirect impacts due to visitors are anticipated.

Alternatives

Redevelopment Alternative

The Redevelopment Alternative would add less employment and residential space in the study area – it would generate about 46% of the jobs (1,570) and 75% of the dwelling units (120 units)

compared with the PCI Plan. However, the Redevelopment Alternative would include an outdoor performance space (in Planning Area 3) and a dedicated event center (in Planning Area 1) that could create higher off-peak visitor use due to larger special events.

The outdoor performance area would include a 3.7-acre landscaped/grass open that that would have a 2,000-square foot outdoor performance space with capacity for approximately 5,000 people. It is expected to host an average of two concerts per week, primarily on weekend evenings from June to September.

With this venue, the Redevelopment Alternative would have a greater potential to generate special events, though these would occur on private lands and would be responsible for their own security.

Comments: Even more need for additional police and EMT, Why? More traffic ,more people, more issues

84-13

Police

Direct Impacts

Most direct impacts to police services under the Redevelopment Alternative would be the same as under the PCI Plan; see the discussion under that section for more information. Exhibit 3.14-22 shows the demand created and the number of officers needed to maintain an effective level of service standard of police officers to residents. The demand of 0.26 FTE officers would be slightly lower than the Proposed Action due to fewer planned dwellings.

Exhibit 3.14-22. Police Service Provider Level of Service and Needs – Redevelopment Alternative 2023

Effective LOS	1.14 Officers per 1,000 residents
Alternative 1 Population 2023	228
Alternative 1: Demand 2023	0.26
% Of Current FTES at 2023	2%

Source: BERK, 2018.

Indirect and Cumulative Impacts

Compared to the proposed PCI Plan, the Redevelopment Alternative would have a smaller contribution of 0.26 FTE, which equates to 9% of the cumulative demand of 3.05 FTEs that is projected to occur with the future baseline.

Exhibit 3.14-23. Police Service Provider Level of Service and Needs – Redevelopment Alternative 2032

Effective LOS	1.14 Officers per 1,000 residents
Future Baseline Population 2032	15,552
Future Baseline, No Alternative 1: Demand 2032	17.79
Future Baseline + Alternative 1: Demand 2032	18.05
Net Future Baseline: Demand 2032	3.05
Alternative 1 % Of Net Future Baseline 2032	9%

Source: BERK, 2018.

The outdoor performance venue included in the Redevelopment Alternative could increase the possibility of special events, though they would be unlikely to occur on public lands or roads in the study area and would not likely require offsite traffic control or increase the need for SPD services.

SPD interviews suggested that current congestion and road capacity constraints at some locations could affect LOS response times, which are described for the PCI Plan. Population and employment growth with the Redevelopment Alternative growth may also incrementally add to traffic congestion, but to a lesser degree than the PCI Plan. For an analysis of traffic conditions and recommended mitigation measures please see Section 3.11 of the Draft EIS.

Fire

Direct Impacts

Exhibit 3.14-24 shows the need for additional firefighters created by the Redevelopment Alternative to maintain an effective level of service standard of firefighters to residents. The demand (0.22) is slightly lower than the PCI Plan due to the lesser amount of residential development. Since the SFD has indicated it has surplus staffing, the practical need for FTEs may be minimal or zero.

Exhibit 3.14-24. Fire Service Provider Level of Service and Needs – Redevelopment Alternative

Effective LOS	0.98 Firefighters per 1,000 residents
Alternative 1 Population: 2023	228
Alternative 1: Demand: 2023	0-0.22
Future Baseline Population: 2032	15,552
Future Baseline, No Alternative 1 2032	15.30
Future Baseline + Alternative 1 2032	15.30-15.52
Net Future Baseline 2032	2.30-2.53
Alternative 1 % Of Net Future Baseline 2032	0-9%

Source: BERK, 2017.

The demand for fire code permit review and code inspections is expected to increase due to development. This would be less than the PCI Plan due to lesser commercial and industrial development and associated jobs.

SFD is typically involved in the special events permit process for events in the public right-of-way or on public properties; this requirement is not anticipated to apply to the Snoqualmie Mill site, which is a private property which will have private roads. Private on-site special events, however, could involve temporary structures such as tents, which would trigger building and fire code provisions.

Indirect and Cumulative Impacts

Redevelopment Alternative residential development would represent 1% of the 2032 baseline demand of residential growth in the city. This is a smaller share than the PCI Plan. Though

employment uses may also increase demand for fire services, Exhibit 3.14-10 shows that current fire services are most impacted by residential activity.

Traffic congestion and response time effects are anticipated to be similar for the SFD as described for the SPD. For an analysis of traffic conditions and recommended mitigation measures please see Section 3.11 of the Draft EIS.

School

Direct Impacts

Exhibit 3.14-24 shows the generation of students under Redevelopment Alternative. The need for classroom space created from growth under the Redevelopment Alternative is 21 students.

Exhibit 3.14-25. Projected Students Generated – Redevelopment Alternative

Schools and Student Generation Rates			Redevelopment Alt. 1 2023		Net Future Baseline 2032		Net Future Baseline w/ Redevelopment Alt.	
School Level	Single Family Rates	Multi-family Rates	Single Family New Students	Multi-family New Students	Single Family New Students	Multi-family New Students	Single Family New Students	Multi-family New Students
Elementary	0.39	0.089	0	11	340	36	340	46
Middle School	0.169	0.042	0	5	147	17	147	22
Highschool	0.198	0.045	0	5	172	18	172	23
Total	0.685	0.175	0	21	659	7	659	92
Grand Total			**21**		**730**		**751**	

Note: totals don't correspond due to rounding.
Source: Snoqualmie Valley School District Capital Facilities Plan, 2019; BERK; 2019.

Indirect and Cumulative Impacts

The growth projected under the future baseline (without Snoqualmie Mill development) would generate an estimated 730 students by 2032. The Redevelopment Alternative would contribute 21 students (3%), bringing the student growth by 2032 to 751.

No indirect impacts are anticipated. Visitors to the site would not affect school services.

No Action Alternative

Police

There would be no direct, indirect or cumulative impacts under the No Action alternative. No growth would occur on the Snoqualmie Mill site and demand for police services would not change from current conditions. Approval of a PCI Plan is a pre-condition of any development of the site, and under No Action a PCI Plan would not be approved.

Projected growth in the future baseline would contribute a demand for 17.79 officers, a net increase of 2.2.79 above the 15 present officers. See Exhibit 3.14-26. Although the 2014 Comprehensive Plan assumed 872 jobs by 2032, these would not occur with No Action.

Exhibit 3.14-26. Police Service Provider Level of Service and Needs - No Action Alternative

Effective LOS	1.14 Officers per 1,000 residents
No Action Population	0
No Action Demand	0
Future Baseline Population: 2032	15,552
Future Baseline: Demand: 2032	17.79
Future Baseline + No Action: Demand: 2032	17.79
Net Future Baseline: Demand: 2032	2.79
No Action % of net Future Baseline: 2032	0%

Source: BERK, 2017.

Fire

There will be no changes to the site under the No Action Alternative, and demand for fire services would not change from current conditions. There would be no direct, indirect or cumulative impacts associated with development of the site.

Demand for fire service would increase as growth occurs under the Comprehensive Plan; to maintain current firefighter ratios per thousand population, about 15.30 FTEs would be needed, or a net increase of 2.30; there would be no contribution of demand from the site. See Exhibit 3.14-27. None of this demand would be attributable to development of the Snoqualmie Mill site.

Exhibit 3.14-27. Fire Service Provider Level of Service and Needs - No Action Alternative

Effective LOS	0.98 Firefighters per 1,000 residents
No Action Population	0
No Action Demand	0
Future Baseline Population: 2032	15,552
Future Baseline: Demand: 2032	15.30
Net Future Baseline: Demand: 2032	2.30
No Action % of net Future Baseline: 2032	0%

Source: BERK, 2017.

School

There will be no changes to the site under the No Action Alternative, and demand for school services would not change from current conditions. There would be no direct, indirect or cumulative impacts associated with development of the site.

Demand for educational services would increase as growth occurs in the City under the Comprehensive Plan. The future baseline growth would result in a future increase of 730 students across K-12 grades. No new residential uses would be proposed on the Snoqualmie Mill site and there would be no contribution to future demand for school space. See Exhibit 3.14-28.

Exhibit 3.14-28. Projected Students Generated – Redevelopment Alternative

Schools and Student Generation Rates			Net Future Baseline: 2032	
School Level	Single Family Rates	Multi-family Rates	Single Family New Students	Multi-family New Students
Elementary	0.39	0.089	340	36
Middle School	0.169	0.042	147	17
Highschool	0.198	0.045	172	18
Total	0.685	0.175	659	71
Grand Total			**730**	
Difference with Future Baseline			**0**	

Note: totals don't correspond due to rounding.
Source: Snoqualmie Valley School District Capital Facilities Plan, 2017; BERK, 2017.

3.14.3. Mitigation Measures

Incorporated Features of Proposal

PCI Plan

Development of the site will increase tax revenue that would offset increases in demand for municipal services. Refer to the Fiscal Impact analysis in Section 3.15 of the EIS.

Planning Area 1

Same as above.

Other Responsibilities and Requirements

Future uses will meet International Building and Fire Code standards regarding the design of structures and handling of hazardous materials as appropriate. Private road and circulation will be designed to meet International Fire Code standards. See Title 15 SMC.

City regulations impose a school impact fee for residential development (SMC 20.10). The current rate is $1,700.07 per multifamily dwelling unit; applicable fees would be calculated at the time of building permit approval.

Other Potential Mitigation Measures How

The pending development agreement could specify procedures for private special events including conditions associated with private security and fire/EMS services for events over a certain size or that require fire code or building code review.

3.14.4. Significant Unavoidable Adverse Impacts

The proposal will create an incremental increase in demand for public services. Increased tax revenue that will be generated from the development that would enable the city to maintain appropriate levels of service for police and fire services. Future residential development would be subject to school impact fees to ensure adequate capacity for students at schools. No significant unavoidable adverse impacts are anticipated.

Comments: Sufficient taxes will not be generated until the majority of the development is complete, until then existing taxpayers will be forced to pay for updating police and fire. There will be serious adverse impacts on the entire city during and after the developer is building and then moves on with his profit. 84-14

Vote for NO ALTERNATIVE ACTION! 84-15

Regards,

Fuzzy Fletcher (Mayor of Snoqualmie-Retired)

_____*Date*_____

Memberships:

Member Sierra Club

Member Snoqualmie Community Action Network (SCAN)

Current and past Public Safety experience

12 years' experience in Emergency Management and Homeland Security

Emergency Management Consultant for Tribes and Municipalities

Communications for Homeland Security, fire, police and emergency services for Tribes and rural jurisdictions

Roles with the Snoqualmie Indian Tribe:

Executive Director of Tribal/Public Safety

Director of Emergency Management and Homeland Security

Chief of Police

Police Officer

Probation Officer

Parole Officer

Wrote North Bend emergency plans:

Comprehensive Emergency Management Plan

Comprehensive Emergency Action Plan

Snoqualmie's Comprehensive Emergency Management Plan

As Mayor of the City of Snoqualmie, helped write plans for communication readiness and operability for the 1st responders for the city

Wrote all of the emergency plans for the Snoqualmie Tribe, including:

Comprehensive Emergency Management Plan

All Hazard plan

Clinic and Medical Preparedness plans

Hazard ID Assessments

SAFECOM Executive Committee as a Tribal representative

SAFECOM Emergency Response Council

King County Executive Radio Policy committee

Technician with the City's HAM team (SECAST)

FCC registered Amateur Radio license

Presented webinar for the University of Washington: Northwest Tribal Emergency Management Council: Building Systems Through Partnerships

Volunteer in the Snoqualmie Police Department

Tribal Emergency Management Association (iTEMA http://itema.org/) – education, training and preparedness activities with Tribal, federal, state, and local agencies and organizations for emergency management and services

Certifications

Level 400 emergency management incident command responder (the same level as most police and fire chiefs)

Probation and parole officer

Certified to teach and write emergency plans

Certified as a trainer in ICS 100-400

Multiple other certifications, including Active Shooter and multiple Terrorism Certifications

Civic Leadership Roles:

Certified Municipal Leader (Association of Washington Cities)

Mayor of the City of Snoqualmie

City Council, City of Snoqualmie

Public Safety Committee of the City Council

Civil Service Commission (Chair and member)

Letter No. 85

Mark Hofman

From: Thyra Demetrick <thyrad@urquharts.net>
Sent: Tuesday, June 30, 2020 2:48 PM
To: Mark Hofman
Subject: Public Comment Snoqualmie Mill Site
Attachments: Document16.docx

Categories: Green category

RECEIVED
JUN 30 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hi Mr. Hofman,
Attached is a letter with regards to the proposed Snoqualmie Mill Site Development that I would appreciate the Council members receive as a matter of my public comment.
Thank you for your assistance,
Thyra Demetrick

June 30, 2020

Dear City Council Members,

I have only been a Snoqualmie resident for six years, but during that time, I have enjoyed exploring the local area and setting deep roots, as my husband and I raise our three children here in the valley. A favorite recreational activity of ours has been to kayak and canoe in the Mill Pond. It is such a tranquil, unpopulated little piece of nature right at the edge of town. Truly a unique treasure to have this pocket of nature undisturbed, and it feels like it blends right in to the environment of having the Snoqualmie Falls nestled amidst nature as well. It is deeply disturbing to me to see that thoughts of developing the Mill Pond/Tokul area are being seriously considered.

This development is not in line with the pristine rural feel of this part of Snoqualmie. People move here and treasure living here precisely because Snoqualmie is very different from nearby developed towns like Issaquah. There are MANY grave environmental concerns that hopefully will be addressed by a professional unbiased study. What I can speak to, is that I believe that a development of this proposed scale will be extremely detrimental as it will add more traffic, noise, light pollution, and change the look and feel of this area. People have a plethora of shopping choices already, both in Snoqualmie, North Bend, and Issaquah or further to Bellevue and even Seattle if they want the kinds of places that the development is looking at bringing in. I do not believe that the convenience of having them in Snoqualmie is worth the negative effects, and I do not believe that the Snoqualmie citizens want it. Save this town for the residents, not the developers that want to make money from it, but not live here to suffer the consequences. I am confident that I speak for most residents (I have talked to many) when I say that we, the residents of Snoqualmie, implore you to leave the Mill Site as is, and preserve the natural recreation and mountain wilderness feeling that this area offers.

85-1

85-2

85-3

85-4

Please vote against the proposed development and stay loyal to preserving Snoqualmie's rich history of the mill site, the pristine wilderness setting and quaint small-town community feeling, as you have done admirably in the past.

Thank you for your devoted service to the City of Snoqualmie, I appreciate you all.

Thyra Demetrick

37927 SE 92nd Pl
Snoqualmie, WA
98065

Letter No. 86

Mark Hofman

RECEIVED
JUL - 2 2020
City of Snoqualmie
Community Development Department

From: Janelle and Mike McCarty <mikeandjanelle@gmail.com>
Sent: Thursday, July 02, 2020 9:33 AM
To: City of Snoqualmie; Mark Hofman; Shared Mill Site EIS
Subject: Re: Comment Period Extended for Mill Property Draft Environmental Impact Statement

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear City of Snoqualmie and the Snoqualmie Mill Ventures,

Please consider promoting affordable housing in this new development.

Others are concerned about too much growth or environmental impacts, but I am strongly concerned with the fact that Snoqualmie Valley has become a home for only the rich and privileged. I would like to do whatever we can to promote affordable housing, housing projects, increase in people of color, and socioeconomic diversity in our community. 86-1

Sincerely,

Janelle McCarty

Resident of Snoqualmie since 2000
Teacher in the SVSD since 2000
Parent of 3 children in Snoqualmie Valley School District and many other programs
Girl Scout Troop Leader

On Fri, Jun 12, 2020 at 1:15 PM City of Snoqualmie <CityOfSnoqualmie@snoqualmiewa.gov> wrote:

> Good afternoon,
>
> You are receiving this email because you have shown interest in the topic of the Mill Property Draft Environment Impact Statement (DEIS). More information about the DEIS is available on the city website at https://www.ci.snoqualmie.wa.us/393/Mill-Property.
>
> To receive weekly city e-news that includes information such as this, please subscribe at info@snoqualmiewa.gov.
>
> Thank you,

Joan Pliego
Communications Manager

City of Snoqualmie
News Release

For immediate release: June 12, 2020

Comment Period Extended for Mill Property Draft Environmental Impact Statement

Snoqualmie, WA – On April 27, 2020, the City of Snoqualmie published for public review and comment the Draft Environmental Impact Statement (DEIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan. The 261-acre site is located within the Snoqualmie city limits and owned by Snoqualmie Mill Ventures LLC. It does not include the adjacent Mill Pond/Borst Lake property.

The written comment period was originally scheduled to close on June 11; however, Snoqualmie Mill Ventures requested that the comment period be extended to July 10 in consideration of numerous requests made during the public meeting and the Snoqualmie Indian Tribe. In light of this request, combined with the requests by members of the public and Snoqualmie Indian Tribe, the comment period has been extended.

Written comments on the DEIS may be submitted at any time up to 11:59 p.m. on July 10. They can be sent to Mark Hofman, SEPA Responsible Official, City of Snoqualmie, PO Box 987, Snoqualmie, WA 98065. Comments may alternatively be emailed to mhofman@snoqualmiewa.gov or MillSiteEIS@snoqualmiewa.gov.

Approval of the DEIS would not by itself authorize any physical construction on the site. If approved, Snoqualmie Mill Ventures would need to apply to physically develop the property. If that application were approved, the site would be redeveloped over a period of approximately 10 to 15 years.

# # #

Media Contact:
Joan Pliego
City of Snoqualmie
jpliego@snoqualmiewa.gov
425-281-3317

Letter No. 87

Mark Hofman

From: Josh Bennett <joshb@pcbennett.com>
Sent: Thursday, July 02, 2020 3:10 PM
To: Mark Hofman
Subject: Snoqualmie Mill PCI plan

Categories: Green category

RECEIVED
JUL - 2 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hello Mark,

My name is Josh Bennett, I'm a Snoqualmie valley resident and college student at Washington State University. I am writing you to express that I am NOT in favor of the proposed Snoqualmie Mill development. Dirtfish Rally school is a Pacific Northwest icon internationally recognized as one of the best rally schools in the entire country. The property is even featured in multiple video games like Dirt Rally 2.0 and Project Cars 2. It's something that has brought our community national recognition and it's the host of great events like summer fest that draw in people from across the state and beyond. It's something that makes our community different from other towns. It's something for people to be jealous of. Sports icons like Travis Pastrana come to Snoqualmie because of Dirtfish. The only facility that compares in the country is in New Hampshire. I'm worried this development will take away from all of that. I don't think another shopping mall or even a nice amphitheater will help Snoqualmie stand out from any other small town off I90 like Dirtfish does. I'm also concerned that the surrounding roads are not well suited for the increased traffic. North Bend has bad enough traffic already without the increased strain that this will bring. I hope you take this into consideration. I don't want the valley to be like every other city. 87-1

Thank you for your time,
Josh Bennett
425-281-6932

Letter No. 88

Mark Hofman

RECEIVED
JUL - 2 2020
City of Snoqualmie
Community Development Department

From: Andrew Rossiter <ajrossiter127@gmail.com>
Sent: Thursday, July 02, 2020 5:32 PM
To: Mark Hofman
Subject: Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan Draft EIS

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hoffman,

I would like to submit a comment.

In the event of the closure of the DirtFish Rally School, myself and many of my friends would be bereft of any reason to visit Snoqualmie. DirtFish sits at the center of a vibrant community, members of which continually surprise me with their exceptional kindness and care towards the towns that we visit. We would count the death of DirtFish as that of a close friend, and mourn its loss as the end of an era. 88-1

Regards,
Andrew Rossiter

Letter No. 89

Mark Hofman

From: Riley Wilkins <riley_wilkins.58@icloud.com>
Sent: Thursday, July 02, 2020 7:00 PM
To: Mark Hofman
Subject: mill planning

Categories: Green category

RECEIVED
- 2 2020
City of Snoqualmie
Community Development Department

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as a valley resident I highly suggest and would like to voice my opinion on not developing that millsite into a new development area the last thing fall city in the valley needs is a new development keep it the way it is it's a historical mark for many people in the valley and we don't need more development clogging up and fucking up the economics of our valley. 89-1

Thank you & have a great rest of your day.
Riley Wilkins

Letter No. 90

Mark Hofman

From: tonester1000@gmail.com

Sent: Friday, July 03, 2020 11:05 AM
To: Mark Hofman
Subject: Mill project

RECEIVED
JUL - 3 2020
City of Snoqualmie
Community Development Department

Categories: Green category

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Mark,
As a teenager in the community that has enjoyed the outdoors and untouched nature as much as is left in the area, I would be extremely upset to see this project come to fruition. This could potentially affect the river, the land all around, and contaminate our drinking water, let alone the effects on the animal populations. To see this move forward it would be proof that the valley is really just run by money and greed now, and the people who have lived here have no say in our future. The fact that the developers have already been breaking code and being forgiven by the city repeatedly is messed up, it's clear they don't have the best interest of our population in mind. 90-1
Sincerely,
Antonio Gil
Sent from my iPhone

Letter No. 91

Mark Hofman

From: Daniel Giorello <dgbossman@gmail.com>
Sent: Friday, July 03, 2020 2:01 PM
To: Mark Hofman
Subject: Please do not build on the old mill grounds

Categories: Green category

RECEIVED
JUL - 3 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Mark,
I'm a citizen of King County that is urgently encouraging you not to develop further on Snoqualmie grounds. We have seen how it's affected Issaquah and Bellevue which have lost much of their natural beauty in favor of more traffic congestion. Part of why Washington is a beloved state is because of how much natural beauty there is to uncover in this wonderful west side, please don't let this mistake go forward as it's only one more nail in a coffin to turning a gorgeous state into an i

91-1

--

dgbossman@gmail.com

Letter No. 92

Mark Hofman

From: Faires, Taylor R <taylor.faires@wsu.edu>
Sent: Saturday, July 04, 2020 9:41 AM
To: Mark Hofman
Subject: Future construction

Categories: Green category

RECEIVED
JUL - 4 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Please do not turn Dirtfish into a mall or residential area. Please do not turn our small old town into Bellevue by destroying our outdoor recreational sites. 92-1

Letter No. 93

Mark Hofman

From: Michelle Twohig <michelletwohig@gmail.com>
Sent: Tuesday, July 07, 2020 1:39 PM
To: Mark Hofman
Subject: The proposed Mill Site project

Categories: Green category

RECEIVED
JUL - 7 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mark,
I am fully against the Mill Site Ventures project for three major reasons:

1. Risk of further pollution to the surrounding waterways and aquifer through the construction process that will greatly disturb the already heavily and dangerously polluted ground; 93-1
2. The amount of traffic from shopping malls, industrial, office and amphitheater that our town cannot even remotely accommodate (nor should taxpayers have to contribute to the limited options in trying to accommodate); 93-2
3. The risk of death to the downtown business core by losing its current buyers who come because they love the small town feel and ease in finding parking. The type of tourist this type of project attracts will not bother to go off site to "the old part of town" where it becomes impossible to find parking (thanks to the mill site industrial/shopping complex). It will kill old town Snoqualmie. 93-3

I live in Snoqualmie. This project will ruin this town. Please don't allow it. 93-4

Sincerely,
Michelle Twohig

Letter No. 94

Mark Hofman

From: Michelle Twohig <michelletwohig@gmail.com>
Sent: Tuesday, July 07, 2020 1:55 PM
To: Mark Hofman
Subject: Fwd: The proposed Mill Site project

Categories: Green category

RECEIVED
JUL - 7 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Just saw a different email address for you, so I'm forwarding with one additional comment:

The people behind Mill Site Ventures, LLC have already shown that they consider themselves above the requirements of environmental compliance as it relates to this site. If there was ever a project that needed heavy environmental compliance for the safety of the area, this is it 94-1

---------- Forwarded message ---------
From: **Michelle Twohig** <michelletwohig@gmail.com>
Date: Tue, Jul 7, 2020 at 1:39 PM
Subject: The proposed Mill Site project
To: <mhofman@ci.snoqualmie.wa.us>

Dear Mark,
I am fully against the Mill Site Ventures project for three major reasons:

1. Risk of further pollution to the surrounding waterways and aquifer through the construction process that will greatly disturb the already heavily and dangerously polluted ground;
2. The amount of traffic from shopping malls, industrial, office and amphitheater that our town cannot even remotely accommodate (nor should taxpayers have to contribute to the limited options in trying to accommodate);
3. The risk of death to the downtown business core by losing its current buyers who come because they love the small town feel and ease in finding parking. The type of tourist this type of project attracts will not bother to go off site to "the old part of town" where it becomes impossible to find parking (thanks to the mill site industrial/shopping complex). It will kill old town Snoqualmie.

I live in Snoqualmie. This project will ruin this town. Please don't allow it.

Sincerely,
Michelle Twohig

Letter No. 95

Mark Hofman

From: R. Kramer <rchrist05@hotmail.com>
Sent: Tuesday, July 07, 2020 6:50 AM
To: Mark Hofman
Subject: Snoqualmie mill project

Categories: Green category

RECEIVED
JUL - 7 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I wanted to submit comments about this project before the deadline Friday. I think it's unsafe to disturb this site due to the several areas of caustic chemicals from the countless years off it functioning as a mill. I also am very worried about traffic and congestion caused by this project. If there aren't any additional plans to widen 202 or account for more traffic in this area, I vehemently disagree with development at this time. Thank you! 95-1

Rachel Kramer
-Resident on snoqualmie ridge

Sent from my iPhone

Letter No. 96

RECEIVED
JUL 7 2020
City of Snoqualmie
Community Development Department

Mark Hofman

From: Carson Bolt <carsonwbolt@comcast.net>
Sent: Wednesday, July 08, 2020 9:53 AM
To: Mark Hofman
Subject: The Snoqualmie Mill Commercial Development is destructive to our community.

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mr. Hofman,

My name is Carson Bolt, I am a resident of north bend and have lived here my entire life. Going to high school at Mount si, everyone knew and had friends that were a part of Dirtfish Rally school, as well as people that continuously for class would journey to the sewage treatment plant, explore the wildlife and perform educational experiments bearing great results, as well as the many many people that live on the other side of the development, and the cross country runners who used those roads every day. The old mill sight and the areas around it are integral to our community, and there is nothing father from the interests and well being of the people in this community, than tearing down massive amounts of wetlands and wild animals HOMES, and sell off the historical site that is the very reason this town exists to corporations and businesses that steal from our community and abuse us financially. The current plans stand to benefit absolutely nobody within the community, it does not stand to expand our community, only restrict it by preventing the land to be used by LOCALS. By people actually in the community, not people stealing from it. Any commercial development that destroys any wildlife and does not properly protect our towns history, as well as its community, is purely destructive to our community and I urge you to seriously reconsider how this land is to be used. Again, it would be much better as a small local museum With a farmers market and a park or field, an emphasis on wildlife protection, with some small local businesses dotted around, IF THEY ARE RUN ENTIRELY BY PEOPLE IN THE COMMUNITY, is an actually productive way to use the land that started our community to better it, instead of destroy it. 96-1

Letter No. 97

RECEIVED
JUL 08 2020
CITY OF SNOQUALMIE

Jim Simon
P.O. Box 495
Snoqualmie, WA
98065

July 8, 2020

Mark Hofman, Community Development Director
City of Snoqualmie
P.O. Box 987
Snoqualmie, WA 98065

hand delivered to city hall at 4:15 pm 7/8/20

Sent via ~~Certified~~ U.S. Mail and email: MillSiteEIS@snoqualmiewa.gov

RE: 1) Public Comments on the Draft Environmental Impact Statement (DEIS) Snoqualmie Mill Planned Commercial/Industrial Plan

2) Flooding In and Around Snoqualmie

3) Upper Snoqualmie River Basin Characteristics

4) Floodplain Management

Dear Mr. Hofman,

The purpose of my comments on the above-referenced DEIS is to express legitimate and substantial concerns regarding unwise use of the floodplain under such adverse conditions that historic Snoqualmie realistically faces. The proposed projects over the next 6 – 12 years is not "Smart Growth" in the Snoqualmie floodplain. 97-1

To understand Snoqualmie Mill Ventures property's role in temporary storage of floodwaters when channel capacity is exceeded, it is important to first understand the former Weyerhaeuser mill site's role in the 1990 flood of record. The land is nearly flat (EXCEPTION – Illegal berm and fill behind) along the course of the Snoqualmie River that is naturally subject to frequent flooding. At its' closest point, the western side of the project property is within approximately 500 feet of the Snoqualmie River. Planning areas 1, 2 and 3 are located approximately 13,000 feet downstream from the confluence of the North, Middle, and South Forks of the Snoqualmie River. 97-2

AFFECTED ENVIRONMENT / REGIONAL SETTING

The Snoqualmie Mill Ventures projects, the historic part of the City of Snoqualmie, and the contiguous unincorporated King County properties all lie within the federally designated 100-year floodplain. The mountainous terrain above the City drains approximately 375 square miles into the Snoqualmie River. On the other hand, the floodplain storage in and around Snoqualmie is approximately 10 square miles. Forest clear-cutting and associated road building have extensively modified large areas in the upper watershed.

97-2

FLOODING FACTS AND FACTORS IN AND AROUND SNOQUALMIE

Channel and Basin Characteristics

a. Floodway designation is outdated. For what it is worth, I quote the following: ".. floodway is unusual because it is negotiated – original computer model showed all of City in floodway … berm is w/in FEMA floodway – was constructed after the designation … also used to have a barge on the pond (Borst Lake) – ended up on road in '89 flood – flow through pond is intense even under current conditions[1] …" Note: The November 9, 1989 peak streamflow was just 44,000 cfs compared to the 2009 event at 60,700 cfs.

97-3

b. Diminished ability of the narrow floodplain to convey flood discharges.

c. Illegal fill[2]: "It seems that the numbers that Weyerhaeuser have provided DDES regarding fill volumes, especially those occurring in 1979 after the effective date of enforcement, should be sufficient evidence for going forward with a Notice and Order with a more detailed assessment of fill volumes being obtained through the discovery process."

d. Extensive flooding history

e. Atmospheric river storms

f. Rain-on-snow

g. Wide-ranging weather patterns

[1] SEPA Progress Record, Snoqualmie Mill, Project No. E93E0609, Telephone conversation, May 4, 1994.
[2] Kathy Newborn memo to Randy Sandin, King County Department of Development and Environmental Services, RE: E9900507 – Snoqualmie Log yard, July 18, 2001.

h. Aggradation (Exhibits A and C)

i. Sediment transport

j. Channel migration

k. Clear-cut logging (Exhibit B)

l. Upstream flood-reduction projects (protecting North Bend from a 500-year flood)

m. Upstream development

n. North, Middle, and South Fork levee systems

o. Snoqualmie Falls dam

p. Inaccurate topographic analysis

q. 2009 inundation map of project site not prepared

r. The DEIS did not consider the overall cumulative flooding impacts of the proposed development and other actions that are likely related in terms of time or vicinity. Considering new information, cumulative impacts occurring in this small floodplain could include indirect effects of the anticipated actions.

97-3

The Importance of Protecting the Floodway[3]

- ✓ "**2.0** ***The Floodway and Why It Is Important*** *... the most important function of a NATURAL floodplain is to convey floodwaters ... Preserving the capacity of floodplains to convey floodwaters through the designation and preservation of a floodway has been an important concept in floodplain management from the very beginning ...*

- ✓ ***2.4 The Importance of Protecting the Floodway*** *The primary benefit to designating a floodway ... is to preserve a portion of the floodplain to convey floodwaters ... Without these requirements, development over time would encroach into the floodway and obstruct the flow of floodwaters thus increasing upstream flood elevations ...*

97-4

- ✓ ***2.4.2 Limiting Development in the Most Hazardous Areas of the Floodplain*** *Since floodways include the stream channel AND the adjacent areas of the*

[3] Guidance for Flood Risk Analysis and Mapping, Floodway Analysis and Mapping, FEMA, November 2019.

floodplain, they tend to include the most hazardous areas of the floodplain WITH the greatest depths and velocities of floodwaters and amount of debris ... These areas pose a threat to public safety and are best avoided

✓ ***2.4.3 Protecting Natural Functions of Floodplains*** *Floodways also protect IMPORTANT NATURAL FUNCTIONS of the floodplain that benefit the community and its citizens ...*

✓ ***2.6.1 More Restrictive Encroachment Standards*** *... Typically, these states limit the increase in flood stages caused by designating the floodway to zero or to an amount such as .1 foot* (1.2 inches) ...

✓ ***5.1 Floodway Analysis*** *... The Mapping Partner performing the hydraulic analysis will determine the floodway USING EQUAL REDUCTION OF CONVEYANCE ON OPPOSITE SIDES OF THE STREAM ... Equal reduction of conveyance means that the conveyance on both sides of the stream is reduced by an equal percentage ... The purpose of using equal reduction of conveyance is to ENSURE that like situated properties are treated equally ...* " 97-4

✓ QUOTE: "*... Based on past discussions we have had, I believe we are in agreement that new development in areas with deep, fast-flowing water should be prevented. The problem is that the Flood Insurance Rate Maps we use to regulate these hazard areas* ***are not always accurate***[4] *...*"

✓ QUESTION: Considering the multiple characteristics of the floodway, floodplain, and watershed, were computational errors in the loss of the unencroached, base floodplain conditions considered? 97-5

[4] King County Surface Water Management Division, Letter from Jim Kramer, Manager, to Snoqualmie City Administer Kim Wilde, December 1, 1992.

Available Flood Data
U.S. Geological Survey Stream Gage 12144500
Snoqualmie River Near Snoqualmie

November 23, 1959	61,000
February 21, 1961	26,600
November 20, 1962	43,200
December 1, 1964	21,000
January 29, 1965	35,800
December 13, 1966	20,800
December 25, 1967	36,000
January 21, 1968	23,800
January 5, 1969	41,500
January 19, 1971	27,200
November 4, 1971	21,900
February 28, 1972	32,500
December 26, 1972	26,200
January 15, 1974	32,100
December 21, 1974	20,500
January 18, 1975	48,100
December 3, 1975	51,800
December 2, 1977	53,800
December 15, 1979	37,600
December 18, 1979	20,000
December 26, 1980	42,600
January 24, 1982	39,900
February 14, 1982	27,800
December 4, 1982	37,000
January 8, 1983	22,400
January 4, 1984	23,700
January 25, 1984	40,600
October 25, 1985	20,000
November 2, 1985	19,500
February 24, 1986	32,500
November 24, 1986	58,100
December 10, 1987	22,800
October 16, 1988	40,400
November 9, 1989	44,000
December 4, 1989	24,000
January 9, 1990	24,100
November 10, 1990	36,600
November 24, 1990	74,300
January 25, 1993	27,100
February 19, 1995	34,200
November 8, 1995	28,300
November 29, 1995	45,500
February 9, 1996	51,700
March 19, 1997	30,400
October 30, 1997	23,600
December 30, 1998	31,600
December 15, 1999	33,000
April 14, 2002	23,800
January 31, 2003	24,400
October 21, 2003	29,200
December 11, 2004	23,500
January 18, 2005	37,100
November 7, 2006	55,000
December 3, 2007	23,100
November 7, 2008	22,200
November 13, 2008	29,600
January 7, 2009	60,700
December 13, 2010	23,900
January 16, 2011	37,900
March 31, 2011	26,300
February 22, 2012	28,800
March 9, 2014	29,100
January 5, 2015	50,100
October 31, 2015	24,100
November 14, 2015	24,100
November 17, 2015	24,400
December 9, 2015	49,500
February 15, 2016	22,000
October 20, 2016	21,900
October 22, 2017	33,900
November 23, 2017	21,000
November 4, 2018	24,400
October 22, 2019	29,100
January 7, 2020	20,900
February 1, 2020	27,400
February 7, 2020	25,200

97-6

1. For the record, I am referencing a letter[5] from Weyerhaeuser to King County Site Development Services Section regarding topographic data. I quote in pertinent part:

   - *"1953 USGS 7.5' Topographic Quad. No log yard development. Site is a shallow bowl with a portion possibly below 410' and a larger portion possibly sloping upward to 420'. An average original log yard floor elev. of **412'** could be easily be assumed ... Conclusions: No log yard fill introduced to the site. Wood products mill site is fully developed in terms of elevation."*

97-6

2. November 23, 1959

   - *"In the City o f Snoqualmie, muddy water swept through many homes leaving a trail of destruction. A portion of a city street sank, developing a large cavity as water collected without a natural outlet. Truckloads of concrete slabs and 58 loads of gravel were dumped into the cavity during the flood to save the road, and to prevent adjacent buildings from being swept away ...[6]"*

3. **November 24, 1990 Flood of Record**: The old City Hall at SE River St. and Falls Avenue SE is about 300 feet from the river's edge. In 1990, the floodwaters in this building were 18 inches deep[7]. The current City Hall is approximately 800 feet from the boundary of the Snoqualmie River. At this location, the 100-year flood depth is computed to be 5 feet[8].

[5] Bill Johnson, Forest Land Use Supervisor, Cascade & Vail Area Operations. August 5, 2002.
[6] Contractor for FEMA: CH2M Hill Inc. (additional data from U.S. Army Corps of Engineers. July 1981.
[7] Final Environmental Impact Statement, Snoqualmie Falls Hydroelectric Project, FERC Project No. 2493, FERC/FEIS-0080F, September 1996.
[8] FEMA Elevation Certificate, Geodatum Inc. February 26, 2008.

4. December 19, 1991[9]

- *"... Regulatory Floodway: The upstream end of the berm crosses the regulatory floodway ...*

- *Surrounding Elevations: Along the west side of the berm, the Mill Pond Road varies between 411 and 418 feet in elevation (King County Engineering Department 1961) ...*

- *Water Surface Elevations: At the upstream end of the berm, published Snoqualmie River water surface elevations are high enough to cross the Mill Pond Road at the berm locations ... Regulatory water surface data is as follows(FEMA 1989): ... 100-year 421.9 ...*

- *The above information demonstrates that the berm is built on flood-prone ground within the regulatory floodway of the Snoqualmie River ... Flood flow paths in this area generally cross the Mill Pond Road as water drains from the Mill Pond and the surrounding overbank toward the river. The berm ... crosses and obstructs this flow path ...*

- *... I have analyzed the effect of the berm's flow obstruction. For an 80,000 cfs event (FEMA's regulatory 100-year flow* – currently 86,000*), I estimate that the berm would deepen the adjacent and upstream water surface elevations by a maximum of 0.25 feet*

- *Reasonably, we can expect that the changes would be even greater on the right overbank, where the berm obstructs flows as they return to the river ... This overbank area – where the benefits of berm removal could be even greater than those stated above -- ...I believe that this limited analysis is sufficient to suggest that the berm does, indeed, offer an opportunity for flood hazard reduction ..."*

97-6

[9] Internal King County Surface Water Management Division Memorandum.

5. **December 19, 1991**[10]

- *"... The analysis concludes that berm modification could lessen local flood depths – Both on the Weyerhaeuser property and within the City of Snoqualmie ..."*

6. **July 6, 1992**[11]

- *"... the study was undertaken not to find an absolute water surface elevation but instead to discern differences caused by physical modifications to the floodplain ... we can have relative confidence that the encroachment would result in a three-inch rise."*

7. **July 6, 1992**[12]

- *"... The methods of this analysis were as follows ... This model includes hydraulic descriptions of the area's topography and an estimated 100-year flow (80,000 cfs) ... [current 100-year flow at Sum of Forks is 86,000 cfs] ... The HEC-2 program's encroachment options were used to simulate total blockage of all flows east of the Mill Pond Road between the SR 202 and PSRHA bridges ... Water surface elevations were then computed and plotted for the encroached and the **UNENCROACHED** (base) conditions ... This simple analysis seems to indicate that moderate flood reduction benefits can be achieved through modification of the berm to **increase local conveyance capacity**."*

97-6

8. **July 7, 1992**[13]

- *"... We discussed how the berm along the Mill Pond Road obstructs flows as they return to the river from the Mill Pond area. This obstruction deepens the Mill Pond, making it less attractive to flows from upstream. The obstruction thus sends additional flows to the river channel and to the City of Snoqualmie."*

[10] King County Surface Water Management Division Letter to Dick Ryon, Land Use Manager, Weyerhaeuser Company.
[11] Internal King County Surface Water Management Division Memorandum
[12] King County Surface Water Management Division Letter to Dick Ryon, Land Use Manager, Weyerhaeuser Company.
[13] Internal King County Surface Water Management Division Memorandum.

9. **In 1993, King County**[14] distinctly gave an overview of the November 1990 inundations, stating:

   - *"The actual complex flow patterns observed in the Thanksgiving 1990 event contrasted sharply with some of the simplifying assumptions made in those federal studies ... This complex, important flow spilt is not described in the many federal studies done to date ... Perhaps more important, high flow velocities were experienced far outside the mapped FEMA floodway ... the western edge of the mill property includes a tall earth berm ... obstructing overbank flows ...assumes **nonexistent** conveyance capacity, and misrepresents actual flow patterns ... Therefore, the FIRM fails to adequately document KNOWN flood hazards."* QUESTIONS: 1) Even now, are there remaining issues with complex, spilt-flows? 2) What are the impacts of high-velocity flows outside the mapped FEMA floodway?

97-6

10. January 7, 2009 Flood

➢ **1910 – 2019 Highest Observed Peak Flows**

	Location	Cubic feet per second (cfs)	Time	Rank No.
North Fork	7 miles NE of Snoqualmie	17,100	1:30 p.m.	1
Middle Fork	6.4 miles East of North Bend	31,200	3:15 p.m.	2
South Fork Above Alice Creek	11 miles SE of North Bend	7,440	1:15 p.m.	5
South Fork at North Bend	At Bendigo Street Bridge North Bend	12,300	7:00 p.m.	2
Coincident Peak Flow	North, Middle, and South at North Bend	58,500	3:15 p.m.	
Snoqualmie at Snoqualmie	0.3 miles downstream from Snoqualmie Falls	60,700	10:00 p.m.	2

[14] King County Flood Hazard Reduction Plan, Appendix B. January 1993.

The DEIS fails to reference the magnitude and depth of the January 2009 flooding on the mill site.

- After the January 2009 flood, FEMA requested that the U.S. Geological Survey document the flood to provide information needed for verification of flood simulated models to be used for current and future flood-insurance studies. The Snoqualmie River was 1 of 8 priority rivers selected by FEMA for mapping of flood inundation in western Washington. However, as noted below, the USGS was denied access to the mill property.

- When I inquired[15] as to why the January 2009 inundation was deleted from an apparent flood of record, Mr. Mastin responded, stating: "... *Actually we did drive out to the Weyerhaeuser area to try to get a HWM at the North end of Borst Lake but we were not allowed to access the land... Since we did not have any flood information in that area North of Borst Lake, we did not include it in our analysis.*" 97-7

- The USGS Report 2010-5177 states: "The application of the flood-mapping procedure to the flooding on the Snoqualmie River at Snoqualmie was a more complex one ... The analysis is subjective, however, and alternative interpretations could be made[16]. NOTE: The USGS two-person flagging team did capture HWMs east of the Snoqualmie River. One high-water mark near the proposed project site (slightly northwest of Borst Lake) established the water-surface elevation to be 422.63 feet.

- Without a flood inundation map, verification of flood simulation models was not achieved. ISSUE: Without a confirmed flood simulation model, this urbanization in a well-documented flood-hazard area increases additional local flood risks. This leaves the community with a higher level of uncertainty. QUESTION: Were 2009 flow contributions from the North (17,100 cfs), Middle (31,200 cfs) and South Fork at North Bend (12,300 cfs) different than what was used in the various models?

[15] Jim Simon personal email to Mark Mastin, Acting Western Water Science Field Team, Surface-Water Specialist, USGS. June 10, 2011.

[16] U.S. Geological Survey Scientific Investigations Report 2010-5711.

11. January 27, 2010: FEMA issued a Letter of Map Revision Determination Document[17]. Their decision states in pertinent part:

> **"We based this determination … without considering subsequent changes in watershed characteristics that could increase flood discharges. Future development of projects upstream could cause increased flood discharges, which could cause increased flood hazards. A comprehensive restudy of your community's flood hazards would consider the cumulative effects of development on flood discharges … and could, therefore, establish greater flood hazards in this area."**

12. Flood Hazard Management Risks[18] identified for this river:

a. Risks to public safety from inundation and deep and erosive flows

b. Risks to public infrastructure, including drainage systems, streets, and building

c. Potential impacts on the regional economy if the City of Snoqualmie is severely flooded

d. Risks to residential and commercial private structures

e. Risks to three public schools

f. Potential for all of these risks to worsen suddenly in the event of a levee failure.

13. **A Mill Pond (Borst Lake) Feasibility and Technical Analysis Project** was scheduled to start in 2013. The project was supposed to be a technical investigation of the effectiveness of actions to reduce flooding in the City. On May 19, 2020, Chase Barton, Snoqualmie Supervising Engineer, King County River and Floodplain Management, informed me: "We have no projects related to the Mill Pond." **QUESTION:** Why wasn't this study completed?

97-7

[17] FEMA Case No. 08-10-0665P.

[18] 2013 King County Flood Hazard Management Plan Update and Progress Report. November 2013.

14. **FOR THE RECORD:**

    - Although 2015 is an outlier, Snoqualmie had 5 floods that year. Furthermore, our community experienced 4 floods within 40 days in 2015 (October 31 – December 9).

15. For the period between January 1, 1975 and December 31, 2019, the National Flood Insurance Program paid losses for 1,063 Snoqualmie claims for a total payment amount of $22,602,100[19].

16. This year, the Snoqualmie River flooded 3 times within 32 days – of which 2 were within 7 days …

    - January 7, 2020
    - February 1, 2020
    - February 7, 2020

17. Above all, a 100-year flood at City Hall would be approximately 5 feet deep. As the crow flies, this is approximately 0.8 mile from the planning areas. In November 1990, the former Weyerhaeuser mill site was overwhelmed with 4½ feet of floodwater and incurred more than $4 million in damages[20]

97-8

ADDITIONAL

1. **FEMA HIGHER STANDARD**: "… Any community may exceed the minimum criteria under this part by adopting MORE comprehensive floodplain management regulations … community officials may have access to information or knowledge of conditions that require, *particularly for human safety*, higher

97-9

[19] Freedom of Information Act request to the Department of Homeland Security, Federal Emergency Management Agency, May 19, 2020.

[20] Internal King County Surface Water Management Division Memorandum, July 7, 1992.

standards …[21] Any floodplain management regulations adopted by a state or community which are more restrictive … are encouraged[22]." City of Snoqualmie representatives have an obligation to make use of flood-related evidence and data to the maximum degree in effectively managing the floodplain. The City of Snoqualmie has disregarded higher standards without consideration of human safety, preservation of flood-prone areas for open space purposes, relocation of occupants away from flood-prone areas, adverse impacts of floodplain development on existing development, and provision for alternative vehicular escape routes when all normal routes are obstructed by flooding. 97-9

2. **CONCERNS OVER MODEL PROCESS – Adequacy of hydrologic and hydraulic analyses:** The Master Drainage Plan states …

   a. **"… DOES NOT warrant a calibrated model of streamflow data."**

   b. **"…warrants the standard methods of analysis … WITHOUT calibration …"**

   c. The Meadowbrook to South Fork model cross sections were developed in the late 1990s[23], effective in 2005 and was not updated in 2010. In terms of hydraulic analysis, would this 20+ year-old data be considered reliable? 97-10

   d. Were rainfall-runoff and future conditions hydrology models used?

   e. A 1953 (Exhibit D) topographic conditions model should be developed to enable comparisons with the proposed development conditions against the average topographic elevation of 412 feet as a reasonable basis for numerical modeling of overland flows.

   f. New bathymetric survey data should be completed to establish the depth of the Snoqualmie River as well as map underwater features

   g. Without rainfall and stream flow data and other pertinent information, the DEIS fails to accurately address and update Snoqualmie's flood hazard risks and impacts.

3. **Project Phasing Concerns**: Although legal, it is totally unsuitable, unprincipled, and unacceptable for the City of Snoqualmie to agree to inappropriate phased 97-11

[21] 44 CFR § 60.1(d)
[22] Fema.gov
[23] Watershed Science & Engineering, Technical Memorandum, March 28, 2018.

environmental review of careless development inside the community's constrained and natural floodplain environment. Unfortunately, the phased review of the Snoqualmie Mill Planned Commercial / Industrial Plan eliminates imperative and cumulative environmental assessment where there is, unquestionably, a significantly higher potential to result in adverse flooding and harmful floodplain impacts. 97-11

4. **Need for Comprehensive Assessment of Flood Impacts**. The DEIS failed to appropriately model the facts and issues. Additionally, worse-case scenarios must be evaluated. This project, while appearing to be somewhat beneficial, does have a significant and direct negative impact on the floodplain. Numerous home sites have been permanently converted to open space because of repeated flood damages. Hundreds of residences remain at imminent danger during flood season. 97-12

5. **Supplemental DEIS (SDEIS)**: Obviously, because of the critical importance identified on floodplain and flooding issues raised during the DEIS comment period, the City must choose to issue a SDEIS with a second comment period prior to issuing the Final EIS. This will allow FEMA, Corps of Engineers, Department of Ecology, Washington Department of Natural Resources, Washington Emergency Management Division, King County River and Floodplain Management, Snoqualmie Indian Tribe, City of Carnation, local citizens and members of the public to review and comment on a SDEIS before the document is finalized. 97-13

SUMMARY OF POTENTIAL IMPACTS

Floodway and Floodplain

1. The "negotiated" Snoqualmie floodway designation of long ago is far from being a rational analysis floodway of today. The existing, prohibited configuration is inadequate to effectively convey increasing peak discharges.

2. **The DEIS states**: "*...it is assumed that for most of the site, the lowest elevation that can be considered as compensating storage during a flood is elevation 418.0*". This elevation is significantly above initial topography prior to use as a log yard. ***Supposing*** does not accurately document the lowest elevation of the **original** floodplain. The main impact would be increased flooding as a result of inaccurate landscape analysis. 97-14

3. Additional changes to floodplain resources would be measurable and would have large consequences on Historic Snoqualmie.

4. Weyerhaeuser Berm: 1.7 million+ cubic yards of illegal fill.

a. **"...According to Table 2[24] of Weyerhaeuser's history of the Snoqualmie log yard ..., the majority of fill to establish the log handling area was placed between 1970 and 1979. The yard floor was filled with 1,742,366 cu. yds. to 8' deep during this time ..."** 97-15

b. The DEIS does not acknowledge the degree of change or loss of floodplain functions compared to 1953. These differences will increase flood hazard risks to historic Snoqualmie.

c. Because the above Weyerhaeuser fill data is new information, a Supplemental DEIS must be completed with updated modeling in order to correct previous estimates and/or discrepancies.

[24] Snoqualmie Log Yard – Estimates of Area, Volumes and Activity Levels 1965-1990, September 22, 1999.

d. Regarding the berm, former King County Hearing Examiner, Stafford Smith, wrote[25]: "The berm and fill affect the direction and levels of floodwaters within the city, alter flood storage and conveyance, increase flood elevations, and divert water into the city … This causes damage to public and private …"

e. The DEIS neglects to document how much of the berm and fill behind the berm would be removed.

f. The Weyerhaeuser Berm Removal Grading Plan[26] reflects property elevations rising and falling between 414.0 and 433.7. Directly across from Mill Pond Road, elevations range from 410.0 to 414.0. 97-15

g. **Impacts of fill material added to the floodway and floodplain:**

- **1,742,366 cubic yards before 1980**
- Increased risks to public safety.
- The "reduced" floodplain would be immediately considerable and have serious consequences locally and regionally.
- Reduced conveyance areas would be ineffective (post 1953).
- Compensatory storage areas would insufficient (post 1953).
- Create and contribute to increases in velocities (post 1990).
- Obstruct overbank flood flows to the north (post 1979).

5. **Sediment Aggradation:** Several enormous gravel bars are present in the Three Forks area, as well as further upstream and downstream (at a minimum, over 20 gravel bars are present from the confluence of the forks down to Snoqualmie Falls). The vertical and horizontal dimensions of these channel bars are gigantic. One would believe from a basin perspective that the hydrology and hydraulic models are likely to be negatively impacted. On June 25, 2020, I measured one of these bars to be approximately 1,400 feet in length and 300 feet in width. I would estimate the elevated region of sediment to be at least 8-10 feet in depth at midpoint of the bar. 97-16

[25] Seattle Times Eastside Bureau, *"The battle of the berm isn't over: Snoqualmie appeals county ruling not to press Weyerhaeuser"*, Sara Jean Green, February 13, 2003.
[26] Landmark, Inc Planning, Engineering, Surveying. Project No. 1090-0001. August 17, 2000.

- **Total Sediment Yield from Upper Snoqualmie River Basin (tons/mi^2/year)**[27]
  - **North Fork** **502**
  - **Middle Fork** **750**
  - **South Fork** (at North Bend) **828**

97-16

- **Atmospheric River Storms**: These rainstorms originate in the Pacific Ocean, also known as "pineapple express" events. The January 7-8, 2009 storm system brought 15.7 inches[28] of rain to Olallie Meadows (elevation 4,030 feet), which is proximate to the Snoqualmie River Basin. The Snoqualmie River Hydraulic Study[29] states in pertinent part: "Major rainfall events over western Washington are occurring more frequently, and some projections suggest that atmospheric river events will increase in intensity and frequency…potentially occurring 4 times as frequently by the 2080s as in the historical time period. This increase would have a significant impact on extreme flooding in the Snoqualmie River basin."

97-17

[27] Geomorphic Assessment, Middle Fork Snoqualmie River, Tanner to Three Forks Natural Area, Herrera Environmental Consultants, Inc. June 18, 2013.
[28] U.S. Department of Agriculture, Natural Resources Conservation Service.
[29] Snoqualmie River Hydraulic Study – Hydrologic Evaluation of Flooding Trends and Current Conditions, King County. July 2018.

6. **INEFFECTIVE FLOW AREAS / NON-CONVEYANCE AREAS**

   a. "*The FEMA floodway ... assumes nonexistent conveyance capacity and misrepresents actual flow patterns*[30]". QUESTION: Did the developer's consultants check with King County River and Floodplain Management Section regarding their assessment of the 1990 flood?

   b. Because the existing and proposed topographic conditions conflict with those of 1953, comprehensive analysis of effective floodplain conveyance and compensatory storage must be reevaluated. Additionally, this examination must be addressed if there are significant changes in a final design. 97-18

   c. Notable short- and long-term impacts on the natural floodplain functions would be considerable.

7. Peak flow comparisons between the Sum of the Forks and the Snoqualmie at Snoqualmie were not examined in the DEIS.

8. The proposed project would knowingly alter the topography in a significant way and would cause measurable effects to the narrow floodplain in all directions.

9. **Floodplain analysis** identifying flows, velocities, and extent of flooding for the existing and proposed conditions was considered as a specific technical element in the Master Drainage Plan. This same floodplain analysis must be completed for the unencroached conditions to capture the substantial differences in the past 66 years. 97-19

10. **The Ordinary High Water Marks of Borst Lake are "UNDETERMINED"**[31]. Consequently, the USGS analysis of northerly flood flows on the project site of the 2009 major inundation on this floodplain property was not determined, nor mapped. As a result, it could be found that the Flood Insurance Study and FIRM underestimates known flood hazards. 97-20

11. **Clearly**, this project will create enormous physical modifications to the natural floodplain. Moderate and major impacts, direct or indirect, could potentially surpass the 100-year base flood elevation with updated modeling. 97-21

[30] King County Flood Hazard Reduction Plan, Appendix B, King County Surface Water Management Division, Public Works Division. January 1993.

[31] Appendix A, Draft Master Drainage Plan, Fig 4-1, Sheet Ex06, Existing Conditions for Snoqualmie Mill.

Hydrologic and Hydraulic Analysis

1. **Noted Anomalies in Gage Records[32]:**

   a. The above reference includes a description of potential sources of error or uncertainty. Anomalies are not addressed in the DEIS. Any irregularities must be addressed in a SDEIS.

   b. Middle Fork – "… Potential sources of error or uncertainty with the (1959) estimate include reliability of the HWMs and selection of an appropriate channel roughness value … this is likely the result of both superelevation and high turbulence associated with the event."

   c. South Fork – The USGS suspects that water is bypassing the North Bend gage during high flows, causing the gage to under-report discharge[33].

      i. In the January 2009 flood, the South Fork (above Alice Creek) crested at 7,440 cfs at 1:15 p.m. The South Fork at North Bend peaked at 7:00 p.m. with a flow of 12,300 cfs. This upsurge of 65.3% would likely affect model calibration. QUESTION: Was this significant rise nearly 6 hours later factored in the various models? 97-22

      ii. The FEMA published 100-year discharge is 15,000 cfs. However, the 2014 Levee Characterization Study[34] estimates the discharge would be 15,650 cfs. QUESTION: How would levee depictions potentially increase North and Middle Forks base flood elevations?

      iii. This study states: "Risk associated with breaching of the South Fork Snoqualmie River Levee system has not been evaluated." *NOTE: In the 1990 flood, King County gave permission to the City of North Bend to breach the right side South Fork levee.* QUESTION: Were North, Middle, and South

[32] Snoqualmie River Hydrologic Study, Evaluations of Flooding Trends and Current Conditions, Watershed Science & Engineering and Herrea Environmental Consultants, Inc. July 13, 2018.
[33] M. Mastin, USGS, personal communication, October 27, 2015. Snoqualmie River Hydrologic Study, July 13, 2018.
[34] Levee Breach Analysis for King County Rivers, Watershed Science and Engineering, Inc., May 8, 2019.

Fork containment levee systems evaluated in the DEIS process?

iv. South Fork levee from river mile (RM) 5.4 to RM 2.1: The above study also states: "The levees are not certified and not accredited by FEMA as flood control levees."

2. "**Rating 8** provides a much better fit to measured flow data. **Application of Rating 8 to peak stages measured in November 2006 and 2009 would increase peak flow estimates for those events by 5 to 10 percent**[35]." Was Rating 8 utilized? 97-22

3. **The "example model output"** for the 100-year flood event under Existing Conditions seen in Figure 2[36] reflects a significant irregularity. The "flood depth with flow velocity vectors" abruptly cease to flow further north. QUESTION: Was an "example model output" for the 100-year flood event under "Reduced Conditions" conducted?

4. Consequently, major local adverse short- and long-term impacts on floodplain functions would be more than significant.

PHYSICAL RESOURCES

River Surface Features

- **Pronounced Channel Aggradation**: Raising of the channel bed occurring over a long period of time may well increase runoff volume. The DEIS did not provide a thorough discussion of sediment-transport impacts on flooding in Snoqualmie. 97-23

SOCIOECONOMICS

Economics

- The population of historic Snoqualmie includes many seniors, as well as numerous families with fixed incomes. Flooding has potential for local adverse impacts that would be long-lastingly significant. In the 1990 flood, approximately two-thirds of 97-24

[35] Snoqualmie River Hydrologic Study, Evaluations of Flooding Trends and Current Conditions, Watershed Science & Engineering and Herrea Environmental Consultants, Inc. July 13, 2018.
[36] Snoqualmie Mill PCI Plan, DEIS, Master Drainage Plan, Appendix A, Goldsmith Land Development Services, February / April 2020.

the city's residential structures had water above the first floor[37]. Snoqualmie has been characterized as the most flood-prone community in the state. ► "If a 100-year flood occurred, damage in the City of Snoqualmie could reach $20.8 million (1988)[38]. **$45 million in 2020**[39]. Over the long-term, collectively, and cumulatively, the proposed grading and filling plans will harmfully contribute to life-threatening conditions in the community. An extreme flood event that has less than a 1% probability remains a significant impact. For example, an increase of 10.8 inches will further add to total damages and insurance claims. 97-24

Environmental Justice

- This major project will have impacts on the surrounding floodplain environment, significantly affecting the quality of the human environment. Adverse impacts during construction could occur during severe storms. Transition-period impacts would be never-ending. Inundation has potential for major and/or moderate, local, regional, short- and long-term effects related to increased flooding. 97-25

Public Health and Safety

- Disruption of Public Services during major floods would be of great consequence. Local residents, particularly senior citizens, would not have access to medical emergency and police needs, including those in the proposed development area. Community safety: In a major flood, there are no evacuation routes out of Snoqualmie. Major, local, adverse impacts related to continued potential for disruption of public services and increased demand for public safety services during floods would be SIGNIFICANT. 97-26

[37] City of Snoqualmie, Washington. Ordinance No. 691. May 26, 1992.
[38] Final Environmental Impact Statement. Snoqualmie Falls Hydroelectric Project. Federal Energy Regulatory Commission. Office of Hydropower Licensing. FERC Project No. 2493. September 1996.
[39] CPI Inflation

CUMULATIVE IMPACTS ANALYSIS

From a basin-wide perspective, I reference the Council on Environmental Quality regulations[40]: "*Cumulative impact* is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of times."

The intensity and duration of cumulative impacts must be considered when determining the scale of cumulative impacts to the floodway and floodplain. Due to the enormous nature of this project, specific impacts need to be precisely quantified. Cumulative influences of development in the limited floodplain will directly and/or indirectly create adverse impacts. The proposed actions and redevelopment alternative would thoroughly and permanently change the floodplain. These man-made alterations would be readily measurable and would have substantial consequences on residents, homes, businesses, schools, churches, and post office. Lives and Livelihoods are at stake with an imprudent full buildout. 97-27

Restoration of this unstable floodplain is an alternative very worthy of consideration.

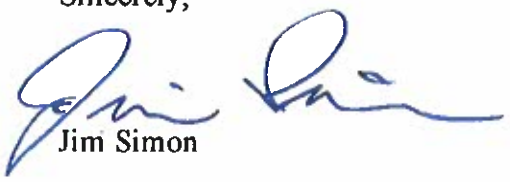
* * * * * * * * * * * *

[40] 40 C.F.R. § 1508.7

A 100-year flood in Snoqualmie will be **41.7% greater** than the January 2009 flood. Major, local, long-term harmful impacts on residents, businesses, and others would be more than significant. Disruption of natural floodplain functions would be considerable.

This Draft Environmental Impact Statement is substandard and deficient for complete evaluation of extremely dangerous flooding issues in and around Snoqualmie. Once again, the current FIRM does not sufficiently reflect the current 1.7 million cubic yards of prohibited fill flood hazard. Physical conditions have changed significantly in the watershed to impact flood stages that have occurred since the original floodway was "negotiated". Based on FEMA's determination of the 2010 LOMR without considering subsequent changes in watershed characteristics that could increase flood discharges, a comprehensive restudy is more than warranted in this case. 97-28

Sincerely,



Jim Simon

Enclosures:

1) Exhibit A
2) Exhibit B
3) Exhibit C
4) Exhibit D – 1953 USGS Topographic Base Map
5) Kathy Newborn Memo July 18, 2001
6) King County Surface Water Management Division, Jim Kramer, Manager, to City of Snoqualmie Administrator, December 1, 1992
7) Table 3 (Weyerhaeuser) Topographic Data
8) King County Surface Water Management Division Internal Memo, December 19, 1991
9) King County Surface Water Management Division Letter to Dick Ryon, Land Use Manager, Weyerhaeuser Company, December 19, 1991
10) King County Surface Water Management Division Letter to Dick Ryon, Land Use Manager, Weyerhaeuser Company, July 6, 1992
11) King County Surface Water Management Division Internal Memo, July 7, 1992

Cc: Snoqualmie City Council Members:
Bob Jeans
Katherine Ross
Bryan Holloway
James Mayhew
Matthew Laase
Sean Sundwall
Peggy Shepard
Matt Larsen, Mayor, City of Snoqualmie
Kim Lisk, Mayor, City of Carnation
Rob McFarland, Mayor, City of North Bend
Mark Carey, Director, Mitigation Division, FEMA Region X
U.S. Army Corps of Engineers – Seattle, Floodplain Mgt. Services
Jerry Franklin, Risk MAP Coordinator, DOE Floodplain Management Program
Chase Barton, Snoqualmie / South Fork Skykomish Supervising Engineer. King County River and Floodplain Management
Kathy Lambert, King County Council. Flood Control District Board of Supervisors

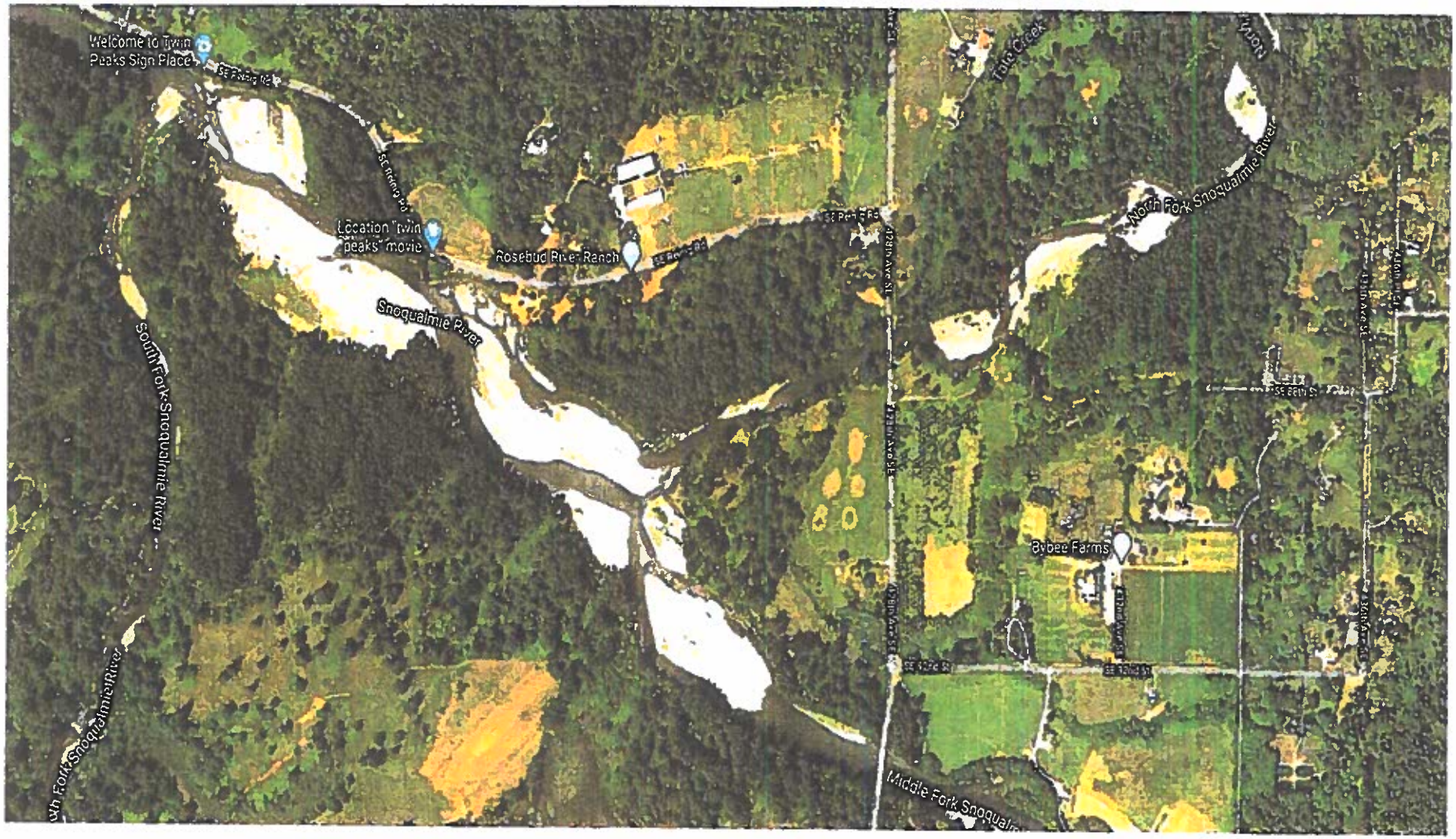


EXHIBIT A: Confluence of North, Middle and South Fork Snoqualmie River



EXHIBIT B: North Fork Snoqualmie River Basin



EXHIBIT C: Downstream aggradations at the mouth of the North Fork Snoqualmie River

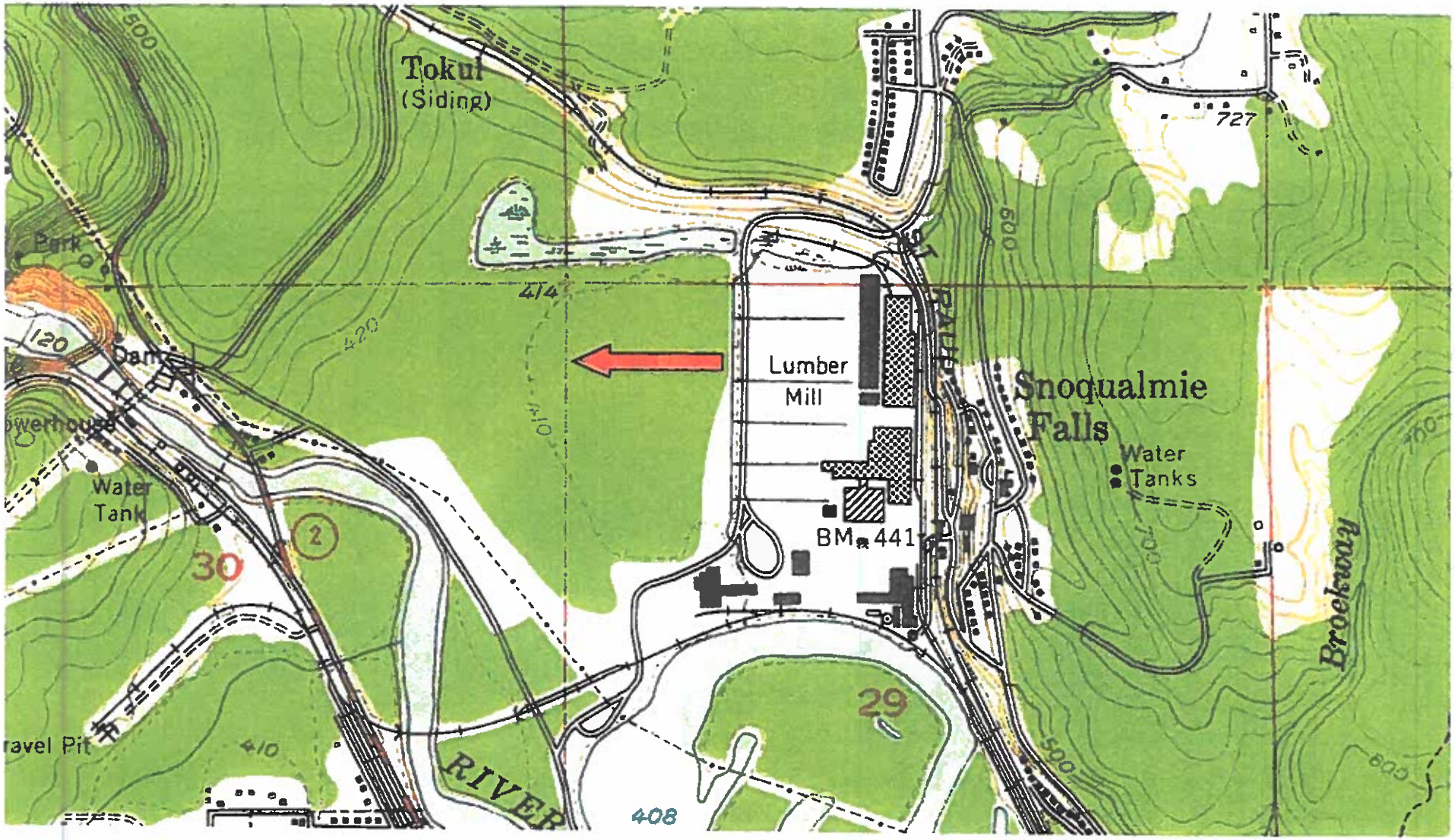


EXHIBIT D: U.S. Geological Survey, Historical File Topographic Division, Snoqualmie, WA N4730-W12145/7.5. 1953.

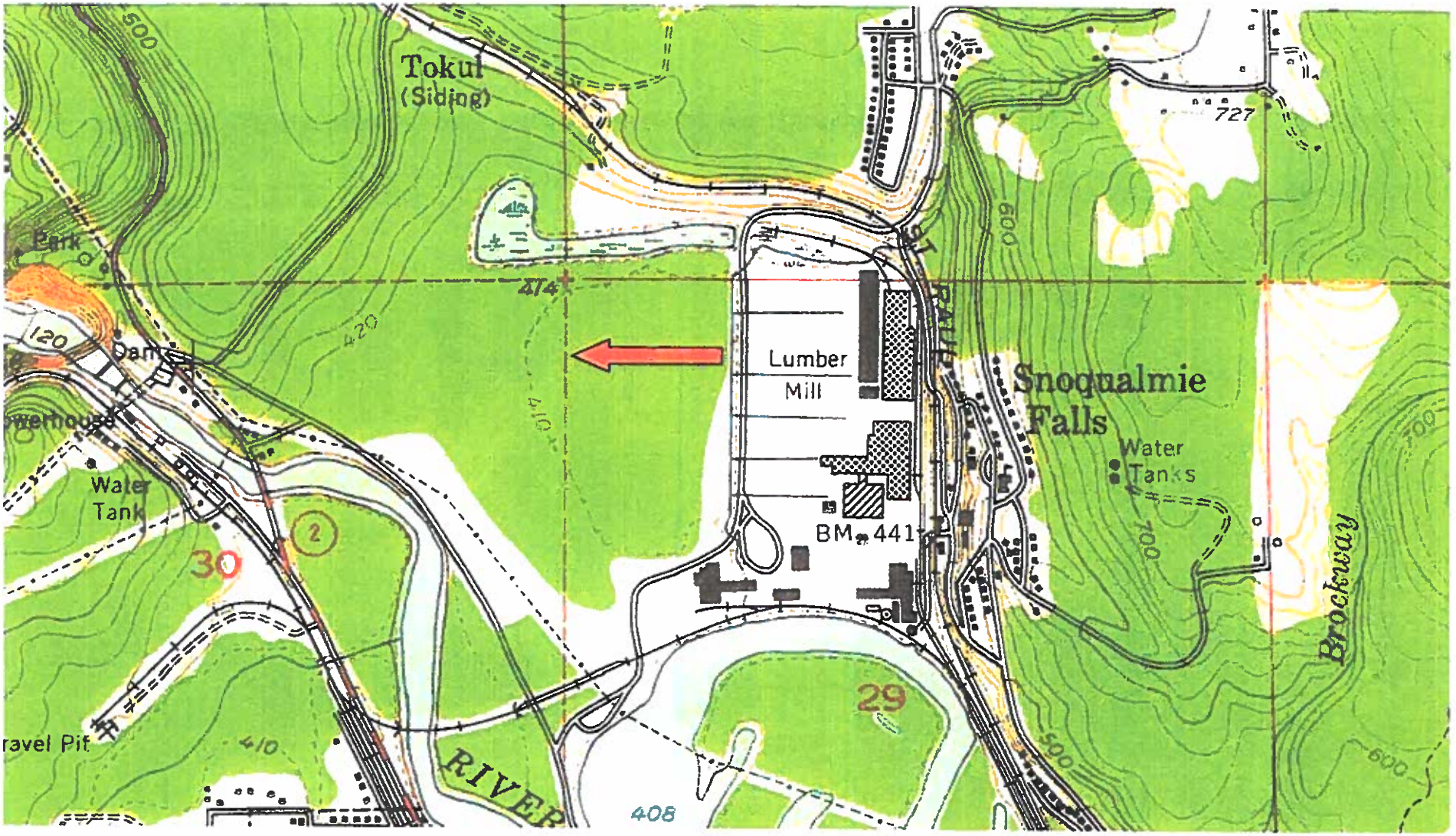


EXHIBIT D: U.S. Geological Survey, Historical File Topographic Division, Snoqualmie, WA N4730-W12145/7.5. 1953.

Letter No. 98

Mark Hofman

From: Sheri Bucy <bucy99@gmail.com>
Sent: Thursday, July 09, 2020 8:52 PM
To: Mark Hofman; Shared Mill Site EIS
Subject: NO Snoqualmie Mill development

Categories: Green category

RECEIVED
JUL - 9 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Hello,

I am 100% against the building of an Amphitheater on the new proposed Mill Site property. 98-1

I also have very strong concerns about the environmental impact any degree of development will have. Construction, dredging, drilling, and piling will disturb the chemical toxins that currently exist and will likely end up in our waterways. Many official studies and reviews have been conducted over the past 50 years and all have concluded a strong presence of the carcinogenic and cancer-causing chemical PCB. Isn't it illegal to develop around an area that is proven to be hazardous and flagged for indefinite isolation? If it's not illegal, it is definitely irresponsible and dangerous! 98-2

The traffic implications of a 5,000 capacity event space are immense. Chateau St Michelle has 4,000 capacity. Marymoor Park has a 5,000 capacity. Redmond has the infrastructure to handle big concerts like this. Snoqualmie doesn't. 2,000+ cars potentially two times a week coming off I-90, Hwy 18, and Hwy 202 and dumping onto Snoqualmie Parkway, Meadowbrook Rd, and Mill Pond is a BIG deal and will negatively impact all Valley residents. 98-3

I am against developing the Mill Site and I am against an Amphitheater of any size in this development plan.

Sincerely,

Sheri Bucy
Geoffrey Bucy
Snoqualmie, WA

Letter No. 99

Mark Hofman

From: monica lowney <monicalowney14@yahoo.com>
Sent: Thursday, July 09, 2020 4:27 PM
To: Mark Hofman; mhoffman@ci.snoqualmie.wa.us; Shared Mill Site EIS
Subject: Snoqualmie Mill DEIS Response- Fisher Ave and Snoqualmie Parkway Intersection- Sent July 9th 2020
Attachments: Signal Justification Report.pdf
Categories: Green category

RECEIVED
JUL - 9 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Mark Hoffman and City of Snoqualmie,

I am writing to provide my concerns regarding the DEIS for the proposed Snoqualmie Mill Site Development. I will start with my concerns pertaining to traffic and transportation issues. Please refer to the traffic study that was provided to the City of Snoqualmie in September of 2018 pertaining to the Fisher Ave. and Snoqualmie Parkway intersection. This traffic report was prepared by Gary Norris, with DN Traffic, a certified Traffic Engineer with decades of experience.

The city never formally replied to my multiple requests for a response to the attached traffic study dated June of 2018, prepared by Gary Norris with DN Traffic. I would like this report to be analyzed by an independent certified traffic engineer with proper qualifications, hired by the City of Snoqualmie or the Mill Site Developer, not city staff, who to my knowledge does not employ a certified traffic engineer.

I am requesting a written response to this traffic report below, which justifies a four way traffic signal at the Snoqualmie Parkway and Fisher Ave intersection, be provided to me via email. I believe a four way traffic signal with four crosswalks for pedestrians is needed prior to development of Planning Area 1 of the Mill Site development. This is the only four way intersection on the Snoqualmie Parkway that does not have a four way traffic signal with four crosswalks between Hwy 90 and Hwy 202. I find this to be very dangerous for pedestrians and drivers. Although the city chose to install a HAWK Crosswalk regardless of the traffic report provided below, the HAWK is not solving the safety issues associated to this dangerous intersection. This has been well publicized and witnessed amongst many citizens and the Snoqualmie Police Department. 99-1

As we are aware, multiple heavy construction and contractor vehicles and trucks will be traveling across this intersection up and down the Snoqualmie Parkway daily from beginning to end of the Mill Site Development. I would like the four way traffic signal with four crosswalks at Fisher Ave. and Snoqualmie Parkway to be installed and in full operation prior to construction of any phase of this development. Please review my email below to the city staff which was not properly addressed or responded to. The pdf for the Fisher Ave and Snoqualmie Parkway traffic study is attached below, and was also sent to city officials and staff in September 2018.

The DEIS states:

https://www.ci.snoqualmie.wa.us/DocumentCenter/View/30865/Mill-Draft-EIS-2020-04-23-PDF

page 1-32

Traffic study for the Mill Site's Draft Environmental Impact Study

"Other Potential Mitigation Measures Planning Area 1
No additional mitigation measures are required for Planning Area 1. **However, the Fisher Ave.** 99-2

intersection would operate at LOS F with or without Planning Area 1; the applicant could contribute a fair share, with other proposed projects, towards signalization of this intersection."

Please justify what this statement above means in general terms? Is this stating the single HAWK crosswalk with no four way traffic signal at this intersection is acceptable? I believe that is what I am reading. If so, I disagree entirely with this statement on the DEIS and the attached traffic study below will explain exactly why. The traffic counts collected three years ago by Gary Norris justified a four way traffic signal at Fisher Ave and Snoqualmie Parkway. This conflicts with the statement made in the DEIS above. Please justify the DEIS statement with facts. 99-2

I would like to see traffic data that will justify the DEIS statement above. As far as I am aware, no current traffic data has been collected and/or fully studied at this intersection in the past three years. If it has been collected, please provide the data to me for justification of this statement. If you do not have current data, please provide a current traffic study at the Fisher Ave and Snoqualmie Parkway intersection. The data I collected through DN Traffic in June of 2017 conflicts with the DEIS statement above and it is believed a four way traffic signal is necessary for safety reasons based on the study below.

It is unacceptable to make determinations based on old data. This data does not include growth which has occurred in the past three years in Snoqualmie. The new Safeway grocery and gas station, new Bartell's drug store, Starbucks with Mod Pizza and a 99 room Hampton Inn to name a few were not counted. Not to mention the construction of new housing that has all been added within the past three years. This additional traffic must be taken into consideration. As well as the additional trucks and cars that will be added to our roads for the construction of the Mill Site. I believe the City of Snoqualmie's data is over four years old. That is simply unacceptable and too old.

I am also wanting to know what "the applicant could contribute a fair share, with other proposed projects, toward signalization of this intersection" means exactly? The developer of the Ironwood Development provided $204,000.00 to the City of Snoqualmie over twelve years ago to help pay for a four way traffic signal at the Fisher Ave and Snoqualmie Parkway intersection. A signed contract with the City of Snoqualmie and Quadrant Homes is in the city records. I have a copy and have shared the contract many times with city officials. I can provide it again if needed.

My question is who will pay for the conversion to a four way traffic signal from the single HAWK crosswalk which was funded through a PSRC Grant and funds given to the City of Snoqualmie from a past developer and/or taxes? The majority of citizens involved in this intersection have been requesting a four way traffic signal for many years citing the dangers. I believe the developer should absorb all of the cost to make this conversion to a four way signal at this intersection, not more tax dollars. Especially with how many cars and heavy trucks will be added to our roadways.

Please explain how the funding will be provided for this intersection conversion? I would also like a new and current traffic study by a certified traffic engineer to be conducted at this intersection, following the guidelines provided by Gary Norris with DN Traffic in his reports. Traffic counts need to be taken at peak hours in peak seasons, not on snow days in winter months. The data that was used by the city is years old and has expired. No current traffic data has been provided and analyzed at the Fisher Ave and Snoqualmie Parkway intersection according to the DEIS. Please provide current traffic counts, data and analysis of the Fisher Ave. Snoqualmie Parkway intersection. 99-3

Thank you,

Monica Lowney -

PO Box 493 Snoqualmie WA 98065
Snoqualmie Community Action Network
Sierra Club & Community Advocate

Please review my email below with the attached traffic study in pdf format provided August 7th, 2018.

----- Forwarded Message -----
From: monica lowney <monicalowney14@yahoo.com>
To: monicalowney14@yahoo.com <monicalowney14@yahoo.com>; Peggy Shepard <pshepard@ci.snoqualmie.wa.us>; Bob Jeans <bjeans@ci.snoqualmie.wa.us>; Bryan Holloway <bholloway@ci.snoqualmie.wa.us>; Katherine Ross <kross@ci.snoqualmie.wa.us>; Sean Sundwall <ssundwall@ci.snoqualmie.wa.us>; James Mayhew <jmayhew@ci.snoqualmie.wa.us>; Matthew Laase <mlaase@ci.snoqualmie.wa.us>; Bob Larson <blarson@ci.snoqualmie.wa.us>; Bob Sterbank <bsterbank@ci.snoqualmie.wa.us>; Matt Larson <mlarson@ci.snoqualmie.wa.us>; Jodi Warren <jwarren@ci.snoqualmie.wa.us>; Mark Hofman <mhofman@ci.snoqualmie.wa.us>; Gary Norris <gary@dntrafficconsultants.com>; Dan Marcinko <dmarcinko@ci.snoqualmie.wa.us>
Sent: Tuesday, August 7, 2018 01:07:39 PM PDT
Subject: Fw: Snoqualmie Parkway/Fisher Road Signal Justification Report

Dear Council Members, Mayor and City Staff:

I am writing you to inform you of a recent traffic survey that was conducted via Gary Norris with DN Traffic regarding the Fisher Ave intersection and the Snoqualmie Parkway. As you can see from the report the data was collected from June of 2017. Volumes have since increased due to the new shopping center opening, and increased population. As we are all aware, the population is only expected to grow in Snoqualmie and the new hotel, the Mill Site development and Salish expansion will be heavy contributors to increased traffic on the Snoqualmie Parkway. Residents have been pleading with the city to install a full four-way traffic signal with four signalized crosswalks at this intersection for over ten years. Unfortunately, the City of Snoqualmie has failed in following through with their prior commitment with Quadrant homes and to residents to install a four-way traffic signal at this intersection over ten years ago.

Frustrated residents have taken it upon themselves to have an outside independent traffic study of the Fisher Ave. and Snoqualmie Parkway intersection performed analyzing all warrants. This is due to the Mayor and city staffs continued refusal to obtain a current traffic study after multiple requests from citizens. City staff has claimed it was not necessary referring to old data, and has attempted to shut citizen voices down. Citizens attempted to explain their concerns to council last February 2018 at a city council meeting. This resulted in an attempt to shut down citizen comments giving citizens a mere two minutes to speak. Acting Mayor and Council Member Holloway gave traffic expert Gary Norris, mere minutes to reason with council even though it was on the agenda. My request of obtaining a current traffic study at the Fisher Ave. intersection at this council meeting was ignored by city staff and the majority of council. The last study conducted by the city is several years old and failed to analyze all traffic warrants as I requested.

The city has claimed they are not obligated to install a four way signal at this intersection due to MUTCD traffic warrants not being met. However, our study proves that this is a false justification. As you will see in the report attached, based on dated over one year ago Traffic Warrant 6 has been met. Furthermore, Traffic Warrant 1 will be met in the very near future. Many residents have expressed concern to the City of Snoqualmie, that they do not believe installing a HAWK Crosswalk at this intersection is safe and they do not want it installed. They want a four way traffic signal with four crosswalks like every other four way intersection on the Snoqualmie Parkway. Why is this intersection being treated differently, many ask? A full traffic signal was also promised to residents over ten years ago by the City staff and Quadrant homes in a written contract dated over ten years ago. A full traffic signal was also a part of the original city plan when this development was designed and was specified in past city budgets to fund installation.

This letter is to inform you all that a full traffic signal is warranted at this intersection. The HAWK Crosswalk does not meet MUTCD requirements to be installed at this intersection and is believed to be a danger to citizens. I am requesting the city conduct a full traffic survey by an independent non biased traffic consultant immediately. I am also requesting this be including in the Environmental Impact Study for the Salish expansion as well as the Mill Site expansion which are future developments planned for Snoqualmie. I have made this request many times in the past, yet my requests are ignored or eliminated by city staff. I am also requesting that any and all construction for a HAWK Crosswalk be put on hold until further analysis and a new traffic study have been conducted at the Fisher Ave. and Snoqualmie Parkway intersection. This should be a minimum requirement, anything less is unacceptable.

Council Member Peggy Shepard has been very involved in advocating for concerned citizens regarding the dangers of a HAWK crosswalk at the Fisher Ave. intersection. I would suggest you listen to what she has discovered and take it seriously please. Thank you Council Member Shepard for your due diligence and effort regarding this matter. In the meantime, please be informed that citizens will hold all City of Snoqualmie representatives accountable for the outcome of this intersection. I hope you will do the right thing and conduct a current traffic study of this intersection.

I would like the HAWK Crosswalk installation to be stopped permanently and the city needs to proceed with installing a full traffic signal with four crosswalks at this intersection. Unless you conduct your own survey to rebut our analysis, anything less then a full traffic signal is unacceptable to citizens. Please pay closer attention to the safety of residents and park visitors who have expressed concern about risking their lives daily traveling through this dangerous intersection. You are in fact obligated to keep the citizens that you represent safe. Citizens want a full four way traffic signal with four crosswalks at the Fisher Ave. and Snoqualmie Parkway intersection immediately. This traffic study justifies this to occur. Citizens do not want a HAWK crosswalk at this intersection. It provides a false sense of security and innocent pedestrians could be injured of killed.

Upon reviewing the attached traffic study, please contact me with your response on what you will be doing to rectify this situation. I will look forward to hearing from you. I am also available to answer any questions you may have. As you are aware, I have been a community advocate regarding the dangers of this intersection for many years now. Thank you for your time and concern.

Sincerely,

Monica Lowney
Community Advocate
Concerned Citizen

---- Forwarded Message ----
From: Gary Norris <gary@dntrafficconsultants.com>
To: monica lowney <monicalowney14@yahoo.com>
Sent: Tuesday, July 31, 2018 11:12:27 AM PDT
Subject: Snoqualmie Parkway/Fisher Road Signal Justification Report

HI Monica,

Please find attached a report summarizing the signal warrants for Snoqualmie Parkway and Fisher Ave. I believe there is enough information here to warrant a full signal at the subject intersection. Please advise how you would like to proceed.

Thanks

Gary

Letter No. 3

Attachment

DNraffic CONSULTANTS
Transportation Engineers and Planners
PO Box 547
Preston, Washington 98050

Traffic Signal Justification Study

Snoqualmie Parkway/Fisher Road SE

Snoqualmie, WA

June 25, 2018

Prepared for:
Ms. Monica Lowney

Prepared by:

DN Traffic Consultants, Inc
PO Box 547
Preston, WA 98050
(425)817-1790

This document, together with the concepts and designs presented herein, as an instrument of services, is intended for the specific purpose and client for which is was prepared. Reuse of and improper reliance on this document without written authorization by DN Traffic Consultants, Inc shall be without liability to DN Traffic Consultants, Inc.

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INTRODUCTION

The following report presents the findings of a Traffic Signal Justification Study (SJR) for a proposed traffic signal at the intersection of Snoqualmie Parkway and Fisher Avenue SE. The analysis was conducted in accordance with the Washington State Department of Transportation requirements and the guidelines of the Manual on Uniform Traffic Control Devices (MUTCD).

The study focuses on the Snoqualmie Parkway/Fisher Avenue intersection. The traffic conditions and physical characteristics of this intersection was evaluated to determine if the installation of a traffic signal would be justified under the existing 2018 volume conditions. A study area map is presented in Figure 1.

METHODOLOGY

The following section summarizes the process used to develop the 2018 volume scenario and determine if traffic signal warrants are met. The signal warrant analysis was conducted using the procedures identified in the 2009 Manual on Uniform Traffic Control Devices (MUTCD) and modified by the 2011 Washington State Supplement.

The Signal Justification Study was prepared using the 2017 and 2018 AM and PM peak period turning movement counts collected by this consultant. The peak hour volumes were interpolated to the eight (8) hour volume scenario using the 24-hour directional volume collected at selected locations along Snoqualmie Parkway in 2017.



Figure 1: Study Area Map

Roadway Network

Snoqualmie Parkway is a four-lane principal arterial providing primary access from Snoqualmie Ridge neighborhoods to I-90, SR-18 and SR 202. The daily traffic volume on Snoqualmie Parkway ranges from 7,300 vehicles per day on the east end to 15,200 vehicles per day on the west end based on 2013 traffic count data presented in the 2014 Comprehensive Plan.[1] Daily traffic volumes collected in 2017 indicated the volumes on the Parkway had increased to 22,300 vehicles per day on the west end and 13,800 vehicles per day on the east end. This is an increase of about 12 percent per year during the four-year period. Snoqualmie Parkway has a landscaped median and a separate, paved non-motorized path on both sides of the street from SE Douglas Ave. to SR 202. Southwest of Douglas Avenue, the path continues only on the west side, south to SE 96th St. North of SE 96th Street. The posted speed limit is 40 mph.

Fisher Road is a two (2) lane local access road which does not have a functional classification in the Snoqualmie Comprehensive Plan. Fisher Road provides access to single and multi-family residential units on the north and south side of Snoqualmie Parkway. In addition, Fisher Road provides access to the Fisher Creek Playground located on the south west corner of the Snoqualmie Parkway/Fisher Road intersection. Current traffic volumes are estimated to be 900 vehicles per day on the south leg and 1000 vehicles per day on the north leg.

Traffic Volumes

PM peak period turning movement volumes at the Snoqualmie Parkway/Fisher Road intersection for the 2018-time horizon were collected in June. The AM peak period volumes were factored to 2018 using AM traffic counts collected in 2017. These volumes were extrapolated to an eight (8) hour volume profile to evaluate MUTCD Warrant #1 – Eight Hour Vehicle Volume. The eight (8) hour volume profile was determined using the 24-hour counts collected on Snoqualmie Parkway in 2017.

A review of the existing AM and PM peak period turning movement counts indicated the peak hours for the two-time periods were as follows:

- AM Peak Hour – 7:00 AM to 8:00 AM
- PM Peak Hour – 4:30 PM to 5:30 PM

A summary of the count data is provided in Appendix A.

A summary of the estimated 2018 eight (8) highest hours volume profile is summarized in Table 1 – Snoqualmie Parkway/Fisher Avenue SE. The 2018 AM and PM peak hours are shown separately in Table 2.

[1] http://wa-snoqualmie.civicplus.com/DocumentCenter/View/1385/Comprehensive-Plan-Adopted-2014-Element-8-Transportation-PDF; Average Daily Traffic Volumes page 8-9

Table 1. Snoqualmie Parkway/Fisher Avenue SE – Eight Highest Hourly Volume

Peak	Hour	Snoqualmie Parkway			Fisher Avenue SE	
		WB	EB	Total	NB	SB
AM	7:00 AM – 8:00 AM	430	640	1,070	56	55
	8:00 AM – 9:00 AM	420	540	960	51	50
	11:00 AM – 12:00 AM	430	500	930	44	43
PM	12:00 PM – 1:00 PM	510	480	990	53	52
	2:00 PM – 3:00 PM	600	520	1120	30	47
	3:00 PM – 4:00 PM	640	580	1220	33	52
	4:00 PM – 5:00 PM	730	630	1360	37	57
	5:00 PM – 6:00 PM	730	660	1390	39	58

Table 2. 2018 AM and PM Peak Hour Volumes

Snoqualmie Parkway/Fisher Avenue SE				
Direction	WB	EB	NB	SB
7:00 AM – 8:00 AM	430	640	56	55
4:30 PM - 5:30 PM	780	730	39	58

Alternative Traffic Control

As part of the signal warrant analysis, an evaluation of alternative traffic control was considered. For the purposes of this discussion, the existing two way stop control was compared against the proposed signalization.

Capacity Analysis

A capacity analysis was conducted for the Snoqualmie Parkway/Fisher Avenue SE for the 2018 AM and PM peak hour volume scenarios. This analysis was completed to compare how the intersections would function under the existing stop-control and the proposed signal. The alternative scenarios were evaluated using Synchro (version 8). The default peak hour factors (by approach) were used in the analysis.

The result of the intersection capacity analysis is presented in Table 3. The results are expressed in terms of level of service (LOS) and delay (seconds per vehicle) per approach. The 95th percentile queue results, expressed in feet, for each intersection configuration are also presented in Table 3. The detailed LOS worksheets are included in the Appendix.

For the purposes of this analysis, it is desirable to achieve a level of service (LOS) of D or better for each approach at the intersections.

Table 3. Level of Service

		AM Peak Hour			PM Peak Hour		
Intersection	**Control**	**LOS[1]**	**Delay[2]**	**Queue[3]**	**LOS[1]**	**Delay[2]**	**Queue[3]**
Snoqualmie Prkwy/Fisher Ave SE	Stop						
NB Approach		C	22	25	F	53	41
SB Approach		B	15	14	D	28	34
WB Approach		A	9	1	A	9	2
EB Approach		A	8	1	B	10	8
Snoqualmie Prkwy/Fisher Ave SE	Signal						
NB Approach		A	9	34	A	9.8	25
SB Approach		A	7	24	A	6	22
WB Approach		C	24	24	D	41	31
EB Approach		C	24	23	C	28	99

1) – LOS – Level of Service
2) – Delay – Average Seconds per vehicle
3) – Queue – 95th Percentile Queue measured in feet

The capacity analysis results indicate the north bound approach (Fisher Avenue) at the Snoqualmie Parkway/Fisher Avenue SE intersection operates at LOS F during the PM peak hour under the existing stop sign control. The level of service for all other scenarios are within the desired value (LOS D).

Installation of a traffic signal would improve LOS for the north bound approach during the PM peak hour from LOS F to LOS D.

WARRANT ANALYSIS RESULTS – FUTURE CONDITIONS (2018)

Warrant 1: Eight-Hour Vehicular Volume

Warrant 1 is satisfied when for each of any eight (8) hours of an average day, the traffic volumes given in the tables shown below exist on the major-street and on the higher-volume minor-street approaches to the intersection. If the vehicles per hour given in both of the 100% columns in the MUTCD Table 4C-1 exist on the major-street and the higher-volume minor-street approaches, respectively, to the intersection and satisfy either Condition A or Condition B for any eight hours of an average weekday, then Warrant 1 is satisfied. The condition for the major-street and minor-street shall be for the same 8 hours. On the minor-street, the higher volume shall not be required to be on the same approach during each of these eight (8) hours.

If the posted or statutory speed limit or the 85th-percentile speed on the major street exceeds 40 mph, or if the intersection lies within an isolated community having a population of less than 10,000, the traffic volumes in the 70% columns in Table 4C-1 may be used in place of the 100% columns. The 2017-2018 population of the City of Snoqualmie is estimated to be 10,670[2]. The 85th percentile speed on Snoqualmie Parkway was stated to be 48 mph in the east bound direction and 49 mph in the west bound direction[3] in the vicinity of the Snoqualmie Parkway/Fisher Avenue intersection.

The 80% columns may be used in place of the 100% columns when street volumes for <u>both</u> the major-street and minor-street approaches meet or exceed the 80% values set forth in the MUTCD and satisfy both Conditions A and B for each of any eight (8) hours of an average day. The condition for the major-street and minor-street shall be for the same eight (8) hours but do not need to be the same for Condition A and Condition B. On the minor-street, the higher volume shall not be required to be on the same approach during each of these 8 hours.

The warrant volumes used in this study for Conditions A and B were taken from the MUTCD Table 4C-1. The current channelization includes two (2) or more lanes on Snoqualmie Parkway and one (1) lane on Fisher Avenue SE.

Table 4. Required Conditions to Satisy Warrant 1

Requirements	Vehicles per hour Threshold for Major street (total of both approaches)				Vehicles per hour Threshold for higher-volume Minor-street approach (one direction only)			
Warrant 1A	600 (100%)	480 (80%)	420 (70%)	336 (56%)	150 (100%)	120 (80%)	105 (70%)	84 (56%)
Warrant 1B	900 (100%)	720 (80%)	630 (70%)	504 (56%)	75 (100%)	60 (80%)	54 (70%)	42 (56%)

To provide a 2018 eight (8) hour volume profile to conduct the Warrant 1 analysis, the projected 2018 AM and PM peak period turning movement volumes were compared to the 24-hour traffic volumes collected at several locations on Snoqualmie Parkway in 2017. This data is included in the Appendix.

[2] https://suburbanstats.org/population/washington/how-many-people-live-in-snoqualmie
[3] Memorandum from Mike Hendrix, P.E., PTOE to Dan Marcinko, PE. Dated January 9, 2018.

Table 5 – Snoqualmie Parkway/Fisher Avenue SE summarizes the average day eight highest hour vehicular volumes. These volumes are compared to the threshold volumes required to satisfy Warrant 1.

Table 5. Snoqualmie Parkway/Fisher Avenue SE – Warrant 1 Evaluation

8 Hours	Volumes (Major Road/ Minor Road)	100% Threshold Conditions A	100% Threshold Conditions B	80% Threshold Conditions A	80% Threshold Conditions B
	VPH	600 / 150	900 / 75	480 / 120	720 / 60
7:00 AM	1068 / 56	YES / NO	YES / NO	YES / NO	YES / NO
8:00 AM	957 / 51	YES / NO	YES / NO	YES / NO	YES / NO
11:00 AM	936 / 50	YES / NO	YES / NO	YES / NO	YES / NO
12:00 PM	991 / 53	YES / NO	YES / NO	YES / NO	YES / NO
2:00 PM	1114 / 47	YES / NO	YES / NO	YES / NO	YES / NO
3:00 PM	1218 / 52	YES / NO	YES / NO	YES / NO	YES / NO
4:00 PM	1361 / 57	YES / NO	YES / NO	YES / NO	YES / NO
5:00 PM	1389 / 58	YES / NO	YES / NO	YES / NO	YES / NO

Based on the data summarized in Table 5, the 2018 hourly volumes on the major-street and higher-volume minor street do not meet the minimum requirements under Conditions A or B for all eight hours at either the 100% thresholds or the 80% thresholds.

If the warrant analysis is based on the 70 percent volume threshold, the minor street volume under Warrant 1B becomes 54 vehicles per hour as shown in Table 4. Application of the 70% threshold is justified because the 85 percentile speeds exceed 40 mph and the Snoqualmie population is around 10,000 persons. Comparing the 70% volume to the 8 highest hourly volume results in three hours, 7:00 AM, 4:00 PM, and 5:00 PM exceeding the 70% threshold volume criteria. The remaining five (5) hourly volumes are all within 7 vehicles per hour (47 -53) of the threshold value. Although, Warrant 1 does not currently meet this requirement, the rate of growth on Snoqualmie Parkway suggests this warrant would be met within one to two years.

Warrant 1 is not currently satisfied but could be within one to two years with current growth rates on Snoqualmie Parkway.

Warrant 2: Four-Hour Vehicular Volume

Warrant 2 is satisfied when the plotted points representing the vehicles per hour on the major street and the corresponding vehicles per hour on the higher-volume minor-street approach for each of any 4 hours of an average day, all fall above Figure 4C-1 shown in the MUTCD for the existing combination of approach lanes. The projected 2018 traffic volumes for the four hours of an average day, with the highest minor street values, were used to evaluate Warrant 2 and are shown in Table 6 for the Snoqualmie Parkway/Fisher Avenue SE intersection.

Table 6. 2018 – Four-Hourly Traffic Volumes for an Average Day

	Traffic Volumes (vehicles per hour)		
Hour	Snoqualmie Parkway Both Approaches	Fisher Avenue SE Higher Volume Approach	Warrant Satisfied?
7:00 – 8:00 AM	1,068	56	NO
3:00 – 4:00 PM	1,218	52	NO
4:00 – 5:00 PM	1,361	57	NO
5:00 – 6:00 PM	1,389	58	NO

The warrant analysis indicated four hours of the average day do not meet Warrant 2 minimums for the Snoqualmie Parkway/Fisher Avenue SE intersection. Therefore, the Snoqualmie Parkway/Fisher Avenue SE intersection does not meet Warrant 2.

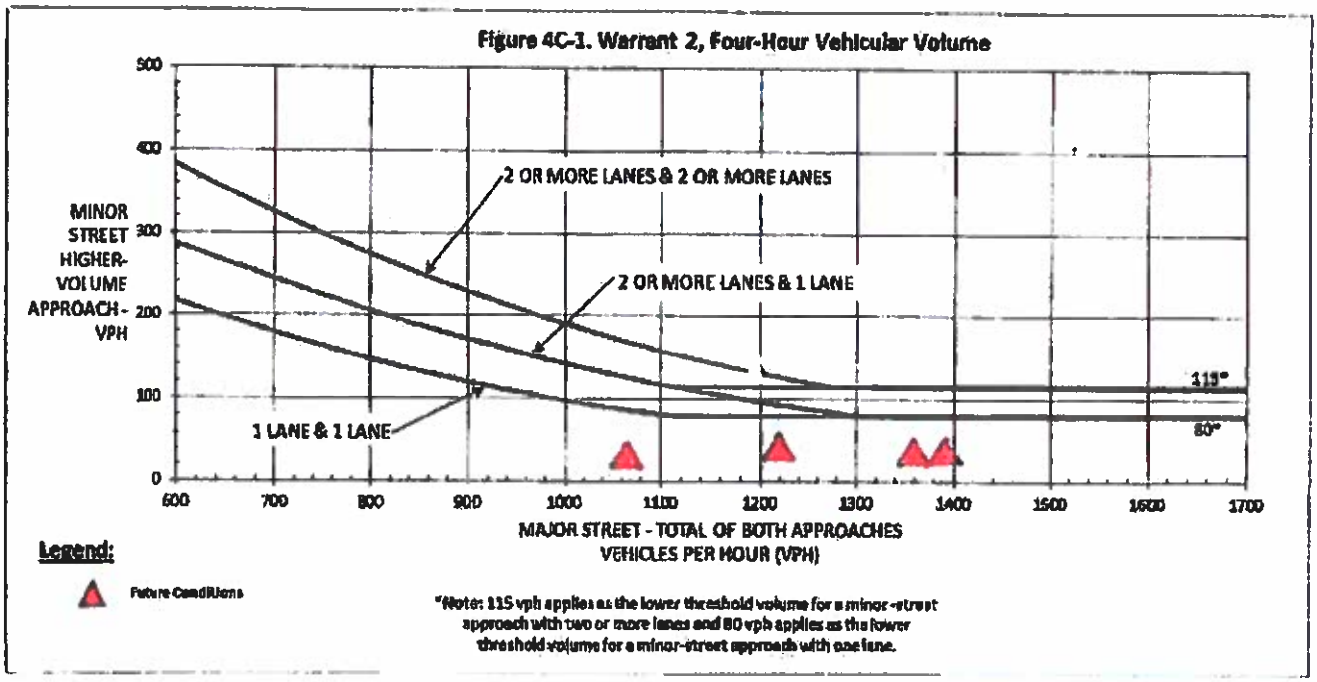

Figure 2. Snoqualmie Parkway/Fisher Avenue SE – Figure 4C-1. Warrant 2, Four-Hour Vehicular Volume

Warrant 2 is not satisfied for the Snoqualmie Parkway/Fisher Avenue SE intersection.

Warrant 3: Peak Hour

Warrant 3 "shall be applied only in unusual cases, such as office complexes, manufacturing plants, industrial complexes, or high-occupancy vehicle facilities that attract or discharge large numbers of vehicles over a short time." The need for a traffic control signal shall be considered if the criteria in either of the following two categories are met:

A. Warrant 3 is satisfied when, for the same 1 hour of an average day, the total delay on one minor-street approach (one direction only) controlled by a STOP sign equals or exceeds 4 vehicle-hours for a one-lane approach or 5 vehicle-hours for a two-lane approach; and the volume on the same minor-street approach equals or exceeds 100 vehicles per hour for one moving lane of traffic or 150 vehicles per hour for two moving lanes; and the total entering volume serviced during the hour equals or exceeds 650 vehicles per hour for intersections with three approaches or 800 vehicles per hour for intersections with four or more approaches;

B. Warrant 3 is satisfied when the plotted points representing the vehicles per hour on the major street (total of both approaches) and the corresponding vehicles per hour on the higher-volume minor-street approach (one direction only) for 1 hour of an average day falls above the applicable figure shown in the MUTCD for the existing and future combination of approach lanes.

The peak hour volume is presented in Table 7 for the Snoqualmie Parkway/Fisher Avenue SE intersection.

Table 7: Snoqualmie Parkway/Fisher Avenue SE - 2018 –Peak Hour Traffic Volume for an Average Day

	Traffic Volumes (vehicles per hour)		
Hour	Snoqualmie Parkway Both Approaches	Telegraph Rd SEB Approach	Warrant Satisfied?
5:00 PM to 6:00 PM	1,389	58	NO

Figure 3 graphically illustrates Warrant 3 for the Snoqualmie Parkway/Fisher Avenue SE intersection.

As shown in Table 7 and graphically illustrated in Figure 3, Warrant 3 is not satisfied for the 2018 peak hour condition at the Snoqualmie Parkway/Fisher Avenue SE intersection as the major and minor road approach peak hour volumes fail to exceed the curve values.

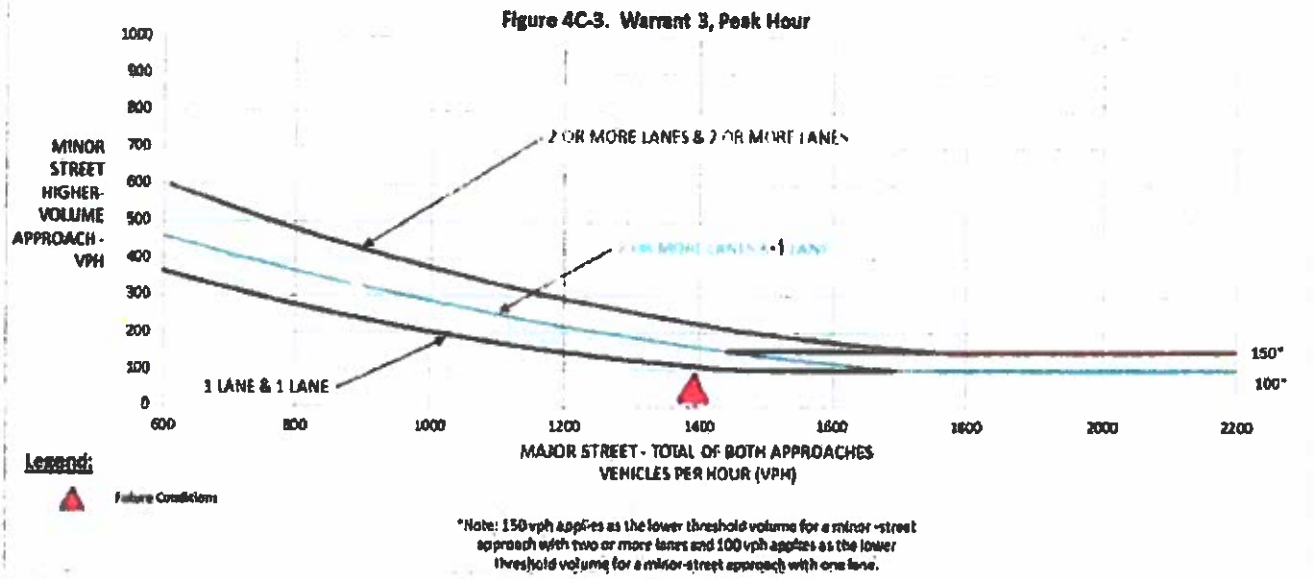

Figure 3. Snoqualmie Parkway/Fisher Avenue SE – Figure 4C-3. Warrant 3, Peak Hour Vehicular Volume

Warrant 3 is not satisfied for the Snoqualmie Parkway/Fisher Avenue SE intersection under the 2018 volume conditions.

Warrant 4: Pedestrian Volume

Warrant 4 is satisfied when the pedestrian volume crossing the major street at the study intersection meets one of the following criteria:

A. For each of any 4 hours of an average day, the plotted points representing the vehicles per hour on the major street (total of both approaches) and the corresponding pedestrians per hour crossing the major street (total of all crossings) all fall above the curve in Figure 4C-5; or

B. For 1 hour (any four consecutive 15-minute periods) of an average day, the plotted point representing the vehicles per hour on the major street (total of both approaches) and the corresponding pedestrians per hour crossing the major street (total of all crossings) fall above the curve in Figure 4C-7.

The most recent AM and PM peak period turning movement counts in the vicinity of the Snoqualmie Parkway/Fisher Avenue SE intersection were collected in 2017 and factored to 2018 using estimated growth rates obtained from historic counts. The turning movement counts summarized pedestrian and bicycle traffic volumes. In general, the pedestrian and bicycle volumes were 16 and 12 respectively during the PM peak hour. There is a current pedestrian generator located on the southwest corner of the Snoqualmie Parkway/Fisher Avenue SE intersection; i.e. Fisher Creek Playground.

Warrant 4 is not satisfied at this time.

Warrant 5: School Crossing

Warrant 5 is applicable where school children crossing the major street are the principal reason for a traffic control signal installation. A minimum of 20 school children are required to cross the road during the highest crossing hour to satisfy the warrant. A traffic signal will include pedestrian crossing phases which will provide a safe option for school children to cross the road.

The closest school, Cascade View Elementary, is approximately 5,000 feet from the intersection. However, all students are bussed to the school and are not required to cross Snoqualmie Parkway. Warrant 5 is not applicable.

Warrant 5 is not applicable.

Warrant 6: Coordinated Signal System

Warrant 6 is satisfied when, "on a two-way street, adjacent traffic control signals do not provide the necessary degree of platooning and the proposed and adjacent traffic control signals will collectively provide a progressive operation." In addition, this warrant should not be applied where the resultant spacing of traffic control signals would be less than 1,000 feet.

Both of the adjacent traffic signals to the Snoqualmie Parkway/Fisher Avenue intersection exceed the minimum 1000-foot spacing requirement. The closest signalized intersections are Fairway Avenue SE to the west, approximately 2,900 feet, and Better Way Loop to the east; approximately 4,600 feet. Signalization of the Snoqualmie Parkway/Fisher Avenue SE intersection could be justified under this warrant.

Warrant 6 is satisfied.

Warrant 7: Crash Experience

Warrant 7 is applicable where the severity and frequency of crashes are the principal reasons to consider the installation of a traffic control signal. This warrant is valid when **all** of the following criteria are met:

A. "Adequate trial of alternatives with satisfactory observance and enforcement has failed to reduce the crash frequency; and

B. Five or more reported crashes, of types susceptible to correction by a traffic control signal, have occurred within a 12month period. Each crash should involve personal injury or property damage apparently exceeding the applicable requirements for a reportable crash; and

C. For each of any 8 hours of an average day, the vehicles per hour given in both of the 80% columns of Condition A in the MUTCD Table 4C-1, or the vehicles per hour in both of the 80% columns of Condition B in the MUTCD Table 4C-1 exists on the major-street and the higher-volume minor-street approach, respectively, to the intersection, or the volume of the pedestrian traffic is not less than 80% of the requirements specified in Warrant 4. These major-street and minor-street volumes shall be for the same 8 hours. On the minor street, the higher volume shall not be required to be on the same approach during each of the 8 hours."

A review of the most recent three-year crash data, provided by the Washington State Patrol, indicated there had only been one crash. This crash occurred in 2016. Therefore, Warrant 7 is not satisfied.

Warrant 7 is not satisfied.

Warrant 8: Roadway Network

Warrant 8 shall be considered for the intersection of two or more major routes and meets one or both of the following criteria:

A. The intersection has a total existing, or immediately projected, entering volume of at least 1,000 vehicles per hour during the peak hour of a typical weekday and has 5-year projected traffic volumes, based on an engineering study, that meet one or more of Warrants 1, 2, and 3 during an average weekday; or

B. The intersection has a total existing or immediately projected entering volume of at least 1,000 vehicles per hour for each of any 5 hours of a non-normal business day (Saturday or Sunday).

A major route as used in this signal warrant shall have at least one of the following characteristics:

- It is part of the street or highway system that serves as the principal roadway network for through traffic flow.
- It includes rural or suburban highways outside, entering, or traversing a city.
- It appears as a major route on an official plan, such as a major street plan in an urban area traffic and transportation study.

A review of these conditions suggest the Snoqualmie Parkway/Fisher Avenue SE intersection does not meet the criteria as the intersection of two major routes.

Warrant 8 is not satisfied for the Snoqualmie Parkway/Fisher Avenue SE intersection.

Warrant 9: Intersection Near a Grade Crossing

Warrant 9 is applied after adequate consideration has been given to other alternative or after a trial of an alternative has failed to alleviate the safety concerns associated with an at-grade railroad crossing.

A Grade Crossing is not near the study intersection; therefore, this criterion is not applicable.

Warrant 9 is not applicable under the current conditions.

CONCLUSIONS

The purpose of this analysis was to determine if 2018 volumes would satisfy the MUTCD warrants for the installation of a traffic control signal at the Snoqualmie Parkway/Fisher Avenue SE intersection. A summary of the evaluation of the warrant criteria from the Manual on Uniform Traffic Control Devices (MUTCD), 2009 Edition is presented below in Table 8 – Snoqualmie Parkway/Fisher Avenue SE:

Table 8: Snoqualmie Parkway/Fisher Avenue SE - Summary of Warrant Analysis

Warrant No.	Warrant Description	Existing Condition (2018)
1	Eight-Hour Vehicular Volume	Not Satisfied
2	Four-Hour Vehicular Volume	Not Satisfied
3	Peak Hour	Not Satisfied
4	Pedestrian Volume	Not Satisfied
5	School Crossing	Not Satisfied
6	Coordinated Signal System	Satisfied
7	Crash Experience	Not Satisfied
8	Roadway Network	Not Satisfied
9	Intersection Near a Grade Crossing	Not Satisfied

According to the MUTCD, the Snoqualmie Parkway/Fisher Avenue SE satisfies Warrant 6. The estimated 2018 volumes are close to satisfying Warrant 1 as well. Signalization will significantly reduce delay for north bound traffic during the PM peak hour. Full signalization of the intersection should be considered.

TECHNICAL APPENDIX

TECHNICAL APPENDIX TABLE OF CONTENTS

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Appendix B: Projected Eight Highest Hourly Volumes

Appendix C: Table 4C-1 (MUTCD): Warrant 1, Eight-Hour Vehicular Volume

Appendix D: Capacity Analysis Worksheets

APPENDIX A

Existing 2017/2018 Turning Movement Counts

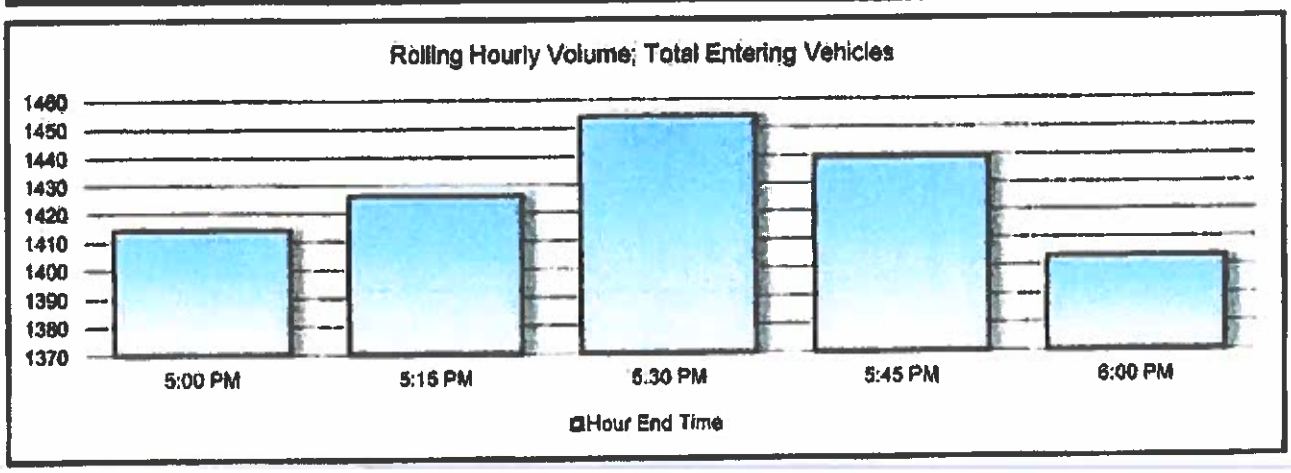
Location:	Fisher Avenue/Snoqualmie Parkway	City/Town	Snoqualmie
Checker:	CJN	Weather:	Overcast	Job:	Snoqualmie Mill Pond
Date:	6/14/17 Wed	Start Time:	4:00 PM	Pk Hr:	4:30 PM 5:30 PM
# of minutes counted per interval:	14.0 minutes				

END	From the NORTH (SOUTHBOUND)						N Leg	From the EAST (WESTBOUND)						E Leg
TIME	RT	TH	LT	TOTAL	HV	Bikes	Peds	RT	TH	LT	TOTAL	HV	Bikes	Peds
4:15 PM	7	0	2	9	0	0	1	6	163	5	174	7	2	1
4:30 PM	10	0	2	12	1	0	3	5	148	5	158	3	0	5
4:45 PM	4	0	1	5	0	1	0	1	142	4	147	3	5	0
5:00 PM	14	0	4	18	0	1	1	3	159	6	168	10	0	0
5:15 PM	10	0	2	12	0	0	0	5	182	1	188	10	1	1
5:30 PM	11	0	2	13	0	0	3	4	156	3	162	5	0	2
5:45 PM	7	0	6	13	1	0	0	2	137	2	141	6	1	3
6:00 PM	4	0	2	6	0	0	0	6	137	7	150	2	2	4
PK HR	39	0	8	48	0	2	4	13	638	14	665	28	6	3
Adj HR	42	0	10	52	0	2	4	14	684	15	713	30	6	3

END	From the SOUTH (NORTHBOUND)						S Leg	From the WEST (EASTBOUND)						W Leg
TIME	RT	TH	LT	TOTAL	HV	Bikes	Peds	RT	TH	LT	TOTAL	HV	Bikes	Peds
4:15 PM	5	0	2	7	0	0	0	11	162	5	178	7	0	0
4:30 PM	3	0	2	5	1	0	0	3	109	6	118	6	0	0
4:45 PM	2	0	4	6	0	0	0	2	148	12	162	3	0	0
5:00 PM	3	0	1	4	0	0	2	5	127	17	149	4	3	4
5:15 PM	5	0	4	9	0	0	0	6	150	14	170	3	0	1
5:30 PM	1	0	7	8	0	0	2	4	122	10	136	3	1	0
5:45 PM	4	0	3	7	0	0	1	7	128	10	145	1	2	6
6:00 PM	2	0	2	4	0	0	0	6	130	9	145	3	3	2
PK HR	11	0	16	27	0	0	4	17	547	53	617	13	4	5
Adj HR	12	0	17	29	0	0	4	18	586	57	661	14	4	5

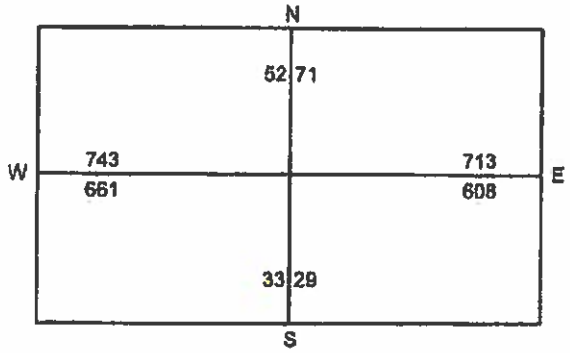
END	15 Min Totals (adj)			
TIME	Veh	HV	Peds	Bikes
16:15	394	15	2	2
16:30	314	11	0	9
16:45	343	6	6	0
17:00	363	15	4	8
17:15	408	14	1	2
17:30	342	9	1	8
17:45	328	11	3	11
18:00	327	5	5	5

Time Start -	End	Rolling Hr Vol	Pk Hr?
4:00 PM	5:00 PM	1414	no
4:15 PM	5:15 PM	1426	no
4:30 PM	5:30 PM	1454	YES
4:45 PM	5:45 PM	1439	no
5:00 PM	6:00 PM	1403	no

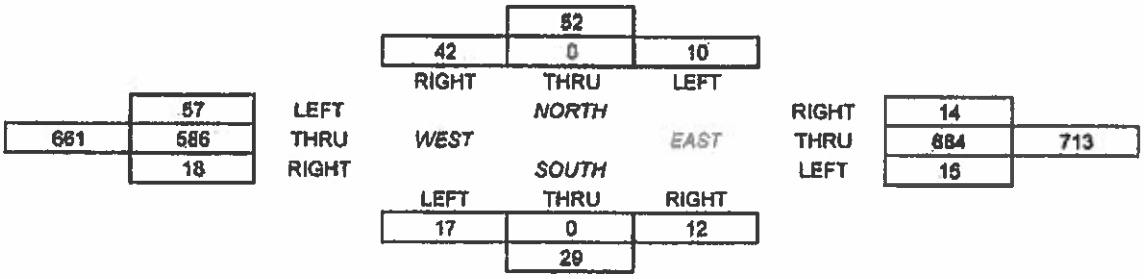


INTERSECTION:	Fisher Avenue/Snoqualmie Parkway
PEAK HOUR:	4:30 PM 5:30 PM
DATE:	14-Jun-17

DIRECTIONAL LEG VOLUMES -- PEAK HOUR



APPROACH VOLUME TURN MOVEMENTS – PEAK HOUR



Pedestrians (Peak Hour)	
Crossing Leg	# of
North	4
South	4
East	3
West	5
Total	16

Bikes (Peak Hour)	
Approach	# of
From North:	2
From South:	0
From East:	6
From West:	4
Total	12

ADJUSTMENT FACTORS DERIVED FROM COUNT

Peak Hour Factors:	From North:	0.67	SB
	From South:	0.75	NB
	From East:	0.88	WB
	From West:	0.91	EB
	Total	0.90	All

Heavy Vehicles:	From North:	0	0.0%	SB
	From South:	0	0.0%	NB
	From East:	30	4.2%	WB
	From West:	14	2.1%	EB

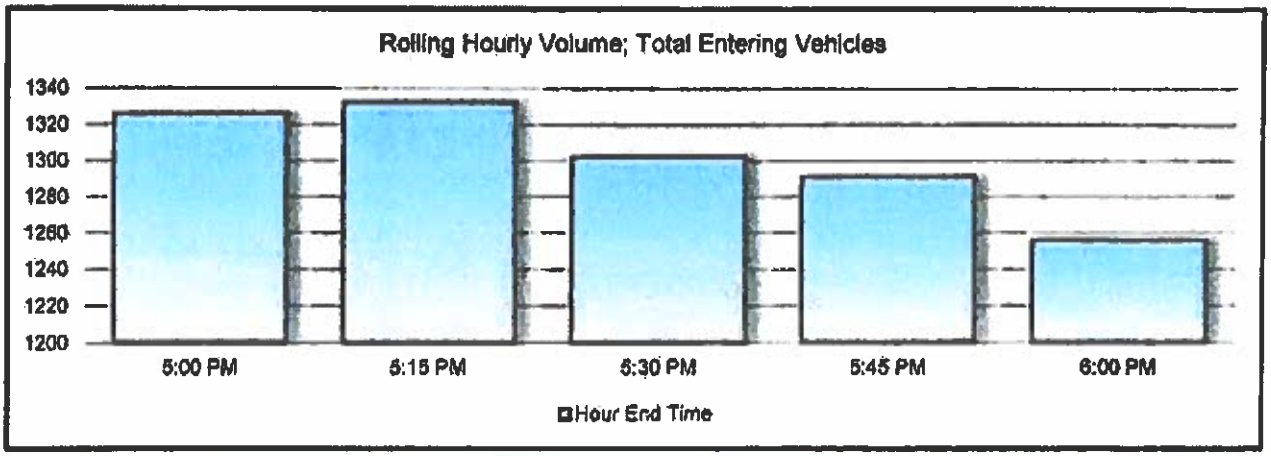
Location:	Snoqualmie Parkway/Fisher Avenue			City/Town	Snqualmie
Checker:	GAN	Weather:	Overcast	Job:	4301 Stone Way
Date:	6/26/18 Thur	Start Time:	4:00 PM	Pk Hr:	4:15 PM 5:15 PM
# of minutes counted per interval:	14.0 minutes				

END TIME	From the NORTH (SOUTHBOUND)						N Leg	From the EAST (WESTBOUND)						E Leg
	RT	TH	LT	TOTAL	HV	Bikes	Peds	RT	TH	LT	TOTAL	HV	Bikes	Peds
4:15 PM	12	0	4	16	3	2	3	4	176	3	183	4		
4:30 PM	2	0	1	3	0	3	4	2	126	2	130	3		
4:45 PM	7	0	5	12	0	2	2	0	161	2	163	7		
5:00 PM	8	0	1	9	4	1	4	1	124	3	128	4	1	1
5:15 PM	8	2	2	12	0	2	4	5	138	3	146	4		1
5:30 PM	4	0	2	6	0	1	1	3	117	2	122	5	1	3
5:45 PM	7	0	2	9	0	1	1	1	124	4	129	4		
6:00 PM	8	0	0	8	0	1	1	2	109	1	112	10		2
PK HR	25	2	9	39	4	8	14	8	539	10	557	18	1	2
Adj HR	27	2	10	39	4	8	15	9	578	11	598	19	1	2

END TIME	From the SOUTH (NORTHBOUND)						S Leg	From the WEST (EASTBOUND)						W Leg
	RT	TH	LT	TOTAL	HV	Bikes	Peds	RT	TH	LT	TOTAL	HV	Bikes	Peds
4:15 PM	0	2	6	8	0	0	1	5	120	9	134	9	0	0
4:30 PM	4	1	3	8	0	0	4	10	137	12	159	4	0	0
4:45 PM	4	0	4	8	0	0	2	4	123	7	134	6	0	0
5:00 PM	2	0	4	6	0	0	2	15	120	12	147	2	0	0
5:15 PM	5	0	5	10	0	0	2	8	158	12	178	5	0	0
5:30 PM	3	0	5	8	2	0		16	104	16	136	1	0	0
5:45 PM	4	1	5	10	1	0	0	7	130	12	149	7	0	0
6:00 PM	4	0	10	14	0	0	0	10	94	20	124	0	0	2
PK HR	15	1	16	32	0	0	10	37	538	43	618	16	0	0
Adj HR	16	1	17	34	0	0	11	40	578	46	662	17	0	0

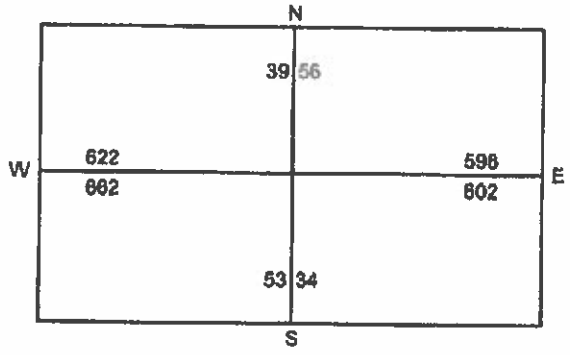
END TIME	15 Min Totals (adj)			
	Veh	HV	Peds	Bikes
16:15	365	17	2	4
16:30	321	8	3	9
16:45	329	13	2	4
17:00	311	11	2	6
17:15	371	10	2	8
17:30	291	9	2	4
17:45	318	13	1	1
18:00	276	11	1	5

Time Start	End	Rolling Hr Vol	Pk Hr?
4:00 PM	5:00 PM	1326	no
4:15 PM	5:15 PM	1332	YES
4:30 PM	5:30 PM	1302	no
4:45 PM	5:45 PM	1291	no
5:00 PM	6:00 PM	1266	no

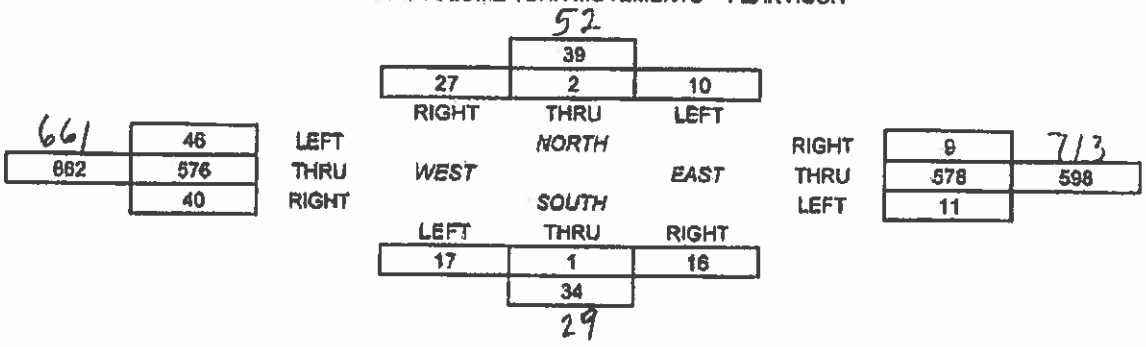


INTERSECTION:	Snoqualmie Parkway/Fisher Avenue
PEAK HOUR:	4:15 PM 5:15 PM
DATE:	25-Jun-18

DIRECTIONAL LEG VOLUMES -- PEAK HOUR



APPROACH VOLUME TURN MOVEMENTS -- PEAK HOUR



Pedestrians (Peak Hour)	
Crossing Leg	# of
North	15
South	11
East	2
West	0
Total	28

Bikes (Peak Hour)	
Approach	# of
From North:	9
From South:	0
From East:	1
From West:	0
Total	10

ADJUSTMENT FACTORS DERIVED FROM COUNT			
Peak Hour Factors:	From North:	0.76	SB
	From South:	0.79	NB
	From East:	0.91	WB
	From West:	0.87	EB
	Total	0.90	All

Heavy Vehicles:	From North:	4	10.3%	SB
	From South:	0	0.0%	NB
	From East:	19	3.2%	WB
	From West:	17	2.6%	EB

APPENDIX B

Projected Eight Highest Hourly Volumes

Interval Start	Snoqualmie Parkway						Fisher Avenue SE					
	2017 Peak Hour			2018 Peak Hour			2017 Peak Hour			2018 Peak Hour		
	WB	EB	Total	WB	EB	Total	NB	SB	Total	NB	SB	Total
7:00 AM	390	581	971	429	639	1068	51	50	101	56	55	111
8:00 AM	381	489	870	419	538	957	46	45	91	51	50	101
9:00 AM	366	370	756	425	407	832	40	39	79	44	43	87
10:00 AM	320	374	694	352	411	763	37	36	73	41	40	81
11:00 AM	393	458	851	432	504	936	45	44	89	50	48	98
12:00 PM	464	437	901	510	481	991	48	47	95	53	52	105
1:00 PM	458	385	843	504	424	927	22	36	58	24	40	64
2:00 PM	541	472	1013	595	519	1114	27	43	70	30	47	77
3:00 PM	580	527	1107	638	580	1218	30	47	77	33	52	85
4:00 PM	663	574	1237	729	631	1361	34	52	86	37	57	94
5:00 PM	661	602	1263	727	662	1389	35	53	88	39	58	97
6:00 PM	455	397	852	501	437	937	24	36	60	26	40	66
7:00 PM	363	271	634	399	298	697	18	27	45	20	30	50

Appendix C

Table 4C-1 (MUTCD): Warrant 1, Eight-Hour Vehicular Volume

Table 4C-1. Warrant 1, Eight-Hour Vehicular Volume

Condition A—Minimum Vehicular Volume

Number of lanes for moving traffic on each approach		Vehicles per hour on major street (total of both approaches)				Vehicles per hour on higher-volume minor-street approach (one direction only)			
Major Street	Minor Street	100%[a]	80%[b]	70%[c]	56%[d]	100%[a]	80%[b]	70%[c]	56%[d]
1	1	500	400	350	280	150	120	105	84
2 or more	1	600	480	420	336	150	120	105	84
2 or more	2 or more	600	480	420	336	200	160	140	112
1	2 or more	500	400	350	280	200	160	140	112

Condition B—Interruption of Continuous Traffic

Number of lanes for moving traffic on each approach		Vehicles per hour on major street (total of both approaches)				Vehicles per hour on higher-volume minor-street approach (one direction only)			
Major Street	Minor Street	100%[a]	80%[b]	70%[c]	56%[d]	100%[a]	80%[b]	70%[c]	56%[d]
1	1	750	600	525	420	75	60	53	42
2 or more	1	900	720	630	504	75	60	53	42
2 or more	2 or more	900	720	630	504	100	80	70	56
1	2 or more	750	600	525	420	100	80	70	56

[a] Basic minimum hourly volume
[b] Used for combination of Conditions A and B after adequate trial of other remedial measures
[c] May be used when the major-street speed exceeds 40 mph or in an isolated community with a population of less than 10,000
[d] May be used for combination of Conditions A and B after adequate trial of other remedial measures when the major-street speed exceeds 40 mph or in an isolated community with a population of less than 10,000

Appendix D

Capacity Analysis Worksheets

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (veh/h)	11	486	8	12	381	8	34	3	19	14	3	39
Sign Control		Free			Free			Stop			Stop	
Grade		0%			0%			0%			0%	
Peak Hour Factor	0.87	0.87	0.87	0.91	0.91	0.91	0.79	0.79	0.79	0.76	0.76	0.76
Hourly flow rate (vph)	13	559	9	13	419	9	43	4	24	18	4	51
Pedestrians		5			5			5			5	
Lane Width (ft)		12.0			12.0			12.0			12.0	
Walking Speed (ft/s)		4.0			4.0			4.0			4.0	
Percent Blockage		0			0			0			0	
Right turn flare (veh)												
Median type		None			None							
Median storage veh)												
Upstream signal (ft)												
pX, platoon unblocked												
vC, conflicting volume	432			573			888	1052	294	790	1053	224
vC1, stage 1 conf vol												
vC2, stage 2 conf vol												
vCu, unblocked vol	432			573			888	1052	294	790	1053	224
tC, single (s)	4.2			4.2			7.5	6.5	6.9	7.7	6.7	7.1
tC, 2 stage (s)												
tF (s)	2.2			2.2			3.5	4.0	3.3	3.6	4.1	3.4
p0 queue free %	99			99			80	98	97	93	98	93
cM capacity (veh/h)	1112			985			212	218	697	246	206	749

Direction, Lane #	EB 1	EB 2	EB 3	WB 1	WB 2	WB 3	NB 1	SB 1
Volume Total	13	372	195	13	279	148	71	74
Volume Left	13	0	0	13	0	0	43	18
Volume Right	0	0	9	0	0	9	24	51
cSH	1112	1700	1700	985	1700	1700	278	453
Volume to Capacity	0.01	0.22	0.11	0.01	0.16	0.09	0.26	0.16
Queue Length 95th (ft)	1	0	0	1	0	0	25	14
Control Delay (s)	8.3	0.0	0.0	8.7	0.0	0.0	22.4	14.5
Lane LOS	A			A			C	B
Approach Delay (s)	0.2			0.3			22.4	14.5
Approach LOS							C	B

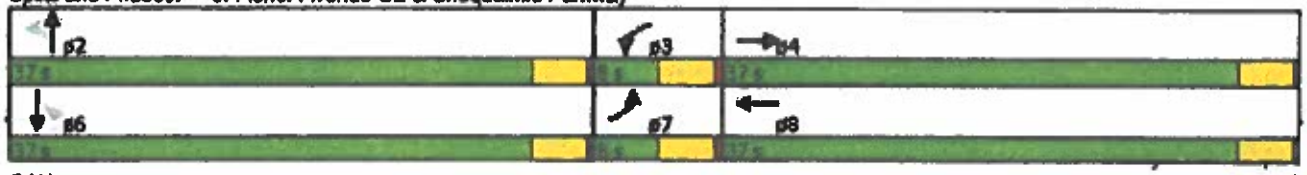
Intersection Summary				
Average Delay	2.5			
Intersection Capacity Utilization	28.4%	ICU Level of Service	A	
Analysis Period (min)	15			

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	11	486	8	12	381	8	34	4	19	14	3	39
Satd. Flow (prot)	1752	3496	0	1752	3492	0	0	1717	0	0	1526	0
Flt Permitted	0.950			0.950				0.823			0.831	
Satd. Flow (perm)	1748	3496	0	1747	3492	0	0	1452	0	0	1437	0
Satd. Flow (RTOR)		2			3			24			51	
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Confl. Bikes (#/hr)			5			5			5			5
Peak Hour Factor	0.87	0.87	0.87	0.91	0.91	0.91	0.79	0.79	0.79	0.76	0.76	0.76
Heavy Vehicles (%)	3%	3%	3%	3%	3%	3%	2%	2%	2%	10%	10%	10%
Shared Lane Traffic (%)												
Lane Group Flow (vph)	13	568	0	13	428	0	0	72	0	0	73	0
Turn Type	Prot	NA		Prot	NA		Perm	NA		Perm	NA	
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Total Split (s)	8.0	37.0		8.0	37.0		37.0	37.0		37.0	37.0	
Total Lost Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Act Effct Green (s)	5.2	13.6		5.2	13.6			10.3			10.3	
Actuated g/C Ratio	0.15	0.39		0.15	0.39			0.29			0.29	
v/c Ratio	0.05	0.42		0.05	0.31			0.16			0.16	
Control Delay	23.9	9.9		23.9	9.2			8.9			6.5	
Queue Delay	0.0	0.0		0.0	0.0			0.0			0.0	
Total Delay	23.9	9.9		23.9	9.2			8.9			6.5	
LOS	C	A		C	A			A			A	
Approach Delay		10.2			9.6			8.9			6.5	
Approach LOS		B			A			A			A	
Queue Length 50th (ft)	1	21		1	14			4			2	
Queue Length 95th (ft)	23	142		24	110			34			24	
Internal Link Dist (ft)		405			606			153			148	
Turn Bay Length (ft)												
Base Capacity (vph)	260	3078		260	3075			1281			1271	
Starvation Cap Reductn	0	0		0	0			0			0	
Spillback Cap Reductn	0	0		0	0			0			0	
Storage Cap Reductn	0	0		0	0			0			0	
Reduced v/c Ratio	0.05	0.18		0.05	0.14			0.06			0.06	

Intersection Summary

Cycle Length: 82
Actuated Cycle Length: 35
Control Type: Actuated-Uncoordinated
Maximum v/c Ratio: 0.42
Intersection Signal Delay: 9.7 — Intersection LOS: A
Intersection Capacity Utilization 32.7% — ICU Level of Service A
Analysis Period (min) 15

Splits and Phases: 3: Fisher Avenue SE & Snoqualmie Parkway



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (veh/h)	63	645	20	17	752	15	19	2	16	10	2	46
Sign Control		Free			Free			Stop			Stop	
Grade		0%			0%			0%			0%	
Peak Hour Factor	0.87	0.87	0.87	0.91	0.91	0.91	0.79	0.79	0.79	0.76	0.76	0.76
Hourly flow rate (vph)	72	741	23	19	826	16	24	3	20	13	3	61
Pedestrians		5			5			5			5	
Lane Width (ft)		12.0			12.0			12.0			12.0	
Walking Speed (ft/s)		4.0			4.0			4.0			4.0	
Percent Blockage		0			0			0			0	
Right turn flare (veh)												
Median type		None			None							
Median storage veh)												
Upstream signal (ft)												
pX, platoon unblocked												
vC, conflicting volume	848			769			1420	1788	392	1419	1791	431
vC1, stage 1 conf vol												
vC2, stage 2 conf vol												
vCu, unblocked vol	848			769			1420	1788	392	1419	1791	431
tC, single (s)	4.2			4.2			7.5	6.5	6.9	7.7	6.7	7.1
tC, 2 stage (s)												
tF (s)	2.2			2.2			3.5	4.0	3.3	3.6	4.1	3.4
p0 queue free %	91			98			68	96	97	83	96	89
cM capacity (veh/h)	776			831			75	71	602	76	65	546

Direction, Lane #	EB 1	EB 2	EB 3	WB 1	WB 2	WB 3	NB 1	SB 1
Volume Total	72	494	270	19	551	292	47	76
Volume Left	72	0	0	19	0	0	24	13
Volume Right	0	0	23	0	0	16	20	61
cSH	776	1700	1700	831	1700	1700	120	235
Volume to Capacity	0.09	0.29	0.16	0.02	0.32	0.17	0.39	0.32
Queue Length 95th (ft)	8	0	0	2	0	0	41	34
Control Delay (s)	10.1	0.0	0.0	9.4	0.0	0.0	53.0	27.5
Lane LOS	B			A			F	D
Approach Delay (s)	0.9			0.2			53.0	27.5
Approach LOS							F	D

Intersection Summary				
Average Delay	3.0			
Intersection Capacity Utilization	41.4%	ICU Level of Service	A	
Analysis Period (min)	15			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (veh/h)	63	645	20	17	752	15	19	2	16	10	2	46
Sign Control		Free			Free			Stop			Stop	
Grade		0%			0%			0%			0%	
Peak Hour Factor	0.87	0.87	0.87	0.91	0.91	0.91	0.79	0.79	0.79	0.76	0.76	0.76
Hourly flow rate (vph)	72	741	23	19	826	16	24	3	20	13	3	61
Pedestrians		5			5			5			5	
Lane Width (ft)		12.0			12.0			12.0			12.0	
Walking Speed (ft/s)		4.0			4.0			4.0			4.0	
Percent Blockage		0			0			0			0	
Right turn flare (veh)												
Median type		None			None							
Median storage veh)												
Upstream signal (ft)												
pX, platoon unblocked												
vC, conflicting volume	848			769			1420	1788	392	1419	1791	431
vC1, stage 1 conf vol												
vC2, stage 2 conf vol												
vCu, unblocked vol	848			769			1420	1788	392	1419	1791	431
tC, single (s)	4.2			4.2			7.5	6.5	6.9	7.7	6.7	7.1
tC, 2 stage (s)												
tF (s)	2.2			2.2			3.5	4.0	3.3	3.6	4.1	3.4
p0 queue free %	91			98			68	96	97	83	96	89
cM capacity (veh/h)	776			831			75	71	602	76	65	546

Direction, Lane #	EB 1	EB 2	EB 3	WB 1	WB 2	WB 3	NB 1	SB 1
Volume Total	72	494	270	19	551	292	47	76
Volume Left	72	0	0	19	0	0	24	13
Volume Right	0	0	23	0	0	16	20	61
cSH	776	1700	1700	831	1700	1700	120	235
Volume to Capacity	0.09	0.29	0.16	0.02	0.32	0.17	0.39	0.32
Queue Length 95th (ft)	8	0	0	2	0	0	41	34
Control Delay (s)	10.1	0.0	0.0	9.4	0.0	0.0	53.0	27.5
Lane LOS	B			A			F	D
Approach Delay (s)	0.9			0.2			53.0	27.5
Approach LOS							F	D

Intersection Summary				
Average Delay	3.0			
Intersection Capacity Utilization	41.4%	ICU Level of Service	A	
Analysis Period (min)	15			

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	63	645	20	17	752	15	19	2	16	10	2	46
Satd. Flow (prot)	1752	3484	0	1752	3492	0	0	1699	0	0	1508	0
Flt Permitted	0.950			0.950				0.890			0.970	
Satd. Flow (perm)	1749	3484	0	1749	3492	0	0	1548	0	0	1473	0
Satd. Flow (RTOR)		4			3			20			61	
Confl. Peds. (#/hr)	5		5	5		5	5		5	5		5
Confl. Bikes (#/hr)			5			5			5			5
Peak Hour Factor	0.87	0.87	0.87	0.91	0.91	0.91	0.79	0.79	0.79	0.76	0.76	0.76
Growth Factor	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Heavy Vehicles (%)	3%	3%	3%	3%	3%	3%	2%	2%	2%	10%	10%	10%
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	0
Parking (#/hr)												
Mid-Block Traffic (%)		0%			0%			0%			0%	
Shared Lane Traffic (%)												
Lane Group Flow (vph)	72	764	0	19	842	0	0	47	0	0	77	0
Turn Type	Prot	NA		Prot	NA		Perm	NA		Perm	NA	
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Total Split (s)	9.0	37.0		8.0	37.0		37.0	37.0		37.0	37.0	
Total Lost Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Act Effct Green (s)	5.1	28.0		4.1	24.0			33.6			33.6	
Actuated g/C Ratio	0.07	0.39		0.06	0.33			0.46			0.46	
v/c Ratio	0.59	0.57		0.19	0.73			0.06			0.11	
Control Delay	57.6	19.4		41.2	25.4			9.8			6.3	
Queue Delay	0.0	0.0		0.0	0.0			0.0			0.0	
Total Delay	57.6	19.4		41.2	25.4			9.8			6.3	
LOS	E	B		D	C			A			A	
Approach Delay		22.7			25.7			9.8			6.3	
Approach LOS		C			C			A			A	
Queue Length 50th (ft)	33	124		9	177			7			4	
Queue Length 95th (ft)	#99	197		31	237			25			22	
Internal Link Dist (ft)		405			606			153			146	
Turn Bay Length (ft)												
Base Capacity (vph)	122	1662		98	1617			727			714	
Starvation Cap Reductn	0	0		0	0			0			0	
Spillback Cap Reductn	0	0		0	0			0			0	
Storage Cap Reductn	0	0		0	0			0			0	
Reduced v/c Ratio	0.59	0.46		0.19	0.52			0.06			0.11	

Intersection Summary

Cycle Length: 83
Actuated Cycle Length: 72.6
Control Type: Actuated-Uncoordinated
Maximum v/c Ratio: 0.73
Intersection Signal Delay: 23.1 — Intersection LOS: C
Intersection Capacity Utilization 63.2% — ICU Level of Service B
Analysis Period (min) 15
95th percentile volume exceeds capacity, queue may be longer.

Queue shown is maximum after two cycles.

Splits and Phases: 3: Fisher Avenue SE & Snoqualmie Parkway



Letter No.100

Mark Hofman

From: Kristin Cernak <kristin.cernak@gmail.com>
Sent: Thursday, July 09, 2020 5:13 PM
To: Mark Hofman
Subject: Fwd: mill site

Categories: Green category

RECEIVED
JUL - 9 2020
City of Snoqualmie
Community Development Department

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---------- Forwarded message ---------
From: **Kristin Cernak** <kristin.cernak@gmail.com>
Date: Thu, Jul 9, 2020 at 5:11 PM
Subject: mill site
To: <MillSiteEIS@snoqualmiewa.gov>, <mhoffman@snoqualmiewa.gov>

Hello

I live on Indian Hill in Snoqualmie which is just over the hill from the mill site so will be directly impacted by its development. In addition to it being a toxic site, I am in favor of doing as little as possible in the area north of the river. We already have far too much traffic around the Tokul roundabout due to the falls and other area attractions. Developing this site would cause way too much stress on the local roads including the one lane Meadowbrook bridge and along Reinig Road which is already overcrowded with people trying to park down by the river. 100-1

I am definitely opposed to the outdoor ampitheater and have previously written about my concerns over the noise level. Even without the ampitheater I don't want to have wineries or any other development on this site. Dirtfish is a good use of the site but not homes and wineries and office space and such. We are at capacity already with our roads. 100-2

I moved out here from the Sammamish plateau because of the rampant development with no regard to the infrastructure there and I really don't want to see that happen here. The Ridge is located south of the river, please keep the development over there. Please do not allow this development to go through as it will impact the lives of all of us who live here in the country in unincorporated King County. This is just wrong on all sorts of levels. 100-3

Please do not let greed ruin our community.

Sincerely,

Kristin Cernak

Letter No. 101

Mark Hofman

From: Dawn Harper <dawninsnoq@gmail.com>
Sent: Friday, July 10, 2020 8:42 AM
To: Mark Hofman
Subject: Re: Mill Site Development

Categories: Green category

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JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

I am writing again to express my concerns about the potential Mill Site development. In a recent message I sent to you I stated that traffic, environmental impact and overall environmental health of the site, water flow and historical value of the area were all of concern. After more time, more research, and more studies being conducted and shared with the public my concerns have become even more dire.

This development is not in the best interest of the community now or in our future. Setting all the above concerns aside, the current change in our economic status alone due to COVID-19 should make you stop and reconsider. Driving through the valley, and seeing the ghost stumps from the old growth trees that once dominated this valley should be reminder enough that development and "progress" are not always best, that once done can not be undone. 101-1

Please rethink this development. The financial backers and planners may have you believing this is a good thing for the valley. While they will benefit, the valley residences, future residence, and ecosystem will pay the consequences.

Thank you for listening to my comments,
Dawn Harper
Dawninsnoq@gmail.com
424-301-1255

On May 16, 2020, at 11:31 AM, Dawn Harper <dawninsnoq@gmail.com> wrote:

Even though the idea of this sounds lovely, the impact of this development would be catastrophic for the valley. Let's first start with the fact that this area is flood plain. Anyone who has lived in the valley knows what happens to that area during floods. I assume you would be adding fill to raise the area? How would this dispersement of affect the valley, both upper and lower? The water has to go somewhere. The water displacement will, without a doubt, affect the rest of the valley, both upper and lower valley.
Then there is the issue of traffic. Already, as a resident of historic downtown Snoqualmie, I risk my life taking a left hand turn onto highway 202; truly. 202 already can not handle the traffic it already experiences. Adding more people, more traffic is not sustainable. The entire downtown traffic plan would need to be recalculated, restructured. Again, this would have a huge environmental and community impact. Is this plan being shared with residence as part of this development? If not, you are not being transparent with the community. Same for the plan of how to disperse the water the new development with displace. All of this needs to be shared with valley residences, from North Bend to Carnation, as it will affect them.
The Mill Pond itself is a source of rich wildlife. Elk, beaver, otter, abundance of birds, turtles, fish, frogs,

all call the pond and center island home. This development would affect this wildlife and habitat indefinitely. Does the impact statement consider the dispersement of this wildlife? It must.
Then there is the historical value of the site. The mill site has a long, rich, history in this valley. Wouldn't it be better to turn this area into a preserved natural area, or park, which embraces the history and celebrates it for all to learn from and remember? Driving through town, and seeing the ghost stumps from the old growth trees that once dominated this valley should be reminder enough that development and "progress" are not always best, that once begun can not be undone.

Please rethink this development. The financial backers and planners may have you believing this is a good thing for the valley. While they will benefit, the valley residences, habitat, and fragile ecosystem will pay the consequences.

Thank you for listening to my comments,
Dawn Harper
Dawninsnoq@gmail.com
424-301-1255

Letter No. 102

Mark Hofman

From: Erin McEachran <shmerin64@hotmail.com>
Sent: Friday, July 10, 2020 9:54 AM
To: Shared Mill Site EIS
Subject: Comment on Snoqualmie Mill
Attachments: WAR303314_DoE_ConstrStormwaterViol_SnoqualmieMillFillSite.pdf

RECEIVED
JUL 10 2020
City of Snoqualmie
Development Department

Categories: Green category

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==========

From: Erin McEachran
and Snoqualmie Community Action Network

To Whom it May Concern,
This is a comment on the Draft Environmental Impact Statement for the Snoqualmie Mill Site.

Attached is a compilation of information from the Department of Ecology's reporting system regarding the applicant's Snoqualmie Mill Fill Site's Construction Stormwater Permit, #WAR303314. There are red marks added to draw attention to important issues with the Snoqualmie Mill Fill Site's failure to comply with the permit.
Specifically:
1. Since 2016, the applicant has never once complied with their monthly Construction stormwater permit monitoring requirements. Almost all submissions were late or not made.
2. The only Department of Ecology inspection report, from 2018, indicated that the site was not properly stabilized.
3. The most recent submissions were in violation of stormwater runoff requirements.

These are serious issues for our environment and the health of our watershed. 102-1

Given this astounding failure, the city of Snoqualmie should not approve or finalize the EIS unless:
1. There is a requirement that any violations of stormwater requirements, including but not limited to duty to submit timely monitoring, will result in an immediate work stoppage and penalty from the city.
2. The City should also require an independent firm to monitor compliance at applicant's expense. Monthly reports should be posted publicly to the city's website.
3. Public inspection should be allowed for members of the public to do their own stormwater sampling on the site.
4. Additional best practices for stormwater management and construction stormwater management beyond minimum laws should be required using the latest science and techniques.
5. A plan must be submitted with the Final Environmental Impact Statement that describes how any violations of stormwater requirements will be cleaned up and addressed to correct the harm that occurred.

Thank you,

Erin McEachran
8120 382nd Ave SE
Snoqualmie, WA 98065

Water Quality Permitting and Reporting Information System (PARIS)

Permits/Applications | Compliance and Violations | Inspections and Enforcements | Help | More Water Quality Info | Search

Information
Use this report to view violations and permit triggers. These include benchmark and limit exceedances on monitoring data, late permit submittals, and other violations noted during an inspection. Click the "More Info" link to view more information about the violation/trigger including any related enforcement actions.

Other Compliance Searches
- Violations/Triggers
- DMR Data
- View DMRs

Violations and Permit Triggers

In Addition to Dates Please Also Fill in one or more fields and click **Search**

Example: WAR0011379 or 11379
Permit Number WAR303314
Facility Name
City
County
Permit Type All Permit Types — Look up Permit Types
Region Choose a Region — Use Region Map
Violation/Trigger Category All Categories
Start Date 5/1/2015
End Date 7/8/2020

Search | Reset

Shareable Link

This report includes both permit violations and permit triggers. Permit triggers are not violations but rather when triggered require the permit holder to take an action defined in the permit. Benchmark exceedances and design criteria (85%) exceedances are permit triggers and not permit violations.
If the "is addressed" column in this report states "yes" then Ecology has taken an informal or formal action to address the violation or permit trigger. It does not refer to any action taken by the permit holder. Ecology's performance goal is to address all permit violations for individual permits. The report includes N/A (not applicable) for general permits.

Search Results

Remove the Permit Status Equal to Active filter to view both active and inactive permits.

Filter Search Result

AND | Permit Status | EqualTo | Active

Permit Status = Active)

Apply

	Facility Name	Permit Number	Permit Status	Permit Type	City	County	Violation Date	Is Addressed	Category	Type	Parameter	Units	Statistical Base	Measurement Value
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	1/30/2020	N/A	Benchmark Exceedance	Benchmark Exceedance				8.69
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	1/1/2020	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	10/21/2019	N/A	Benchmark Exceedance	Benchmark Exceedance				37.4
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	2/1/2018	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	1/1/2018	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	12/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	11/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	11/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	10/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	10/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	9/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	9/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	8/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	8/1/2017	N/A	Monitoring Violations	Analysis not Conducted				

1 | Page size 250

	Facility Name	Permit Number	Permit Status	Permit Type	City	County	Violation Date	Is Addressed	Category	Type	Parameter	Units	Statistical Base	Measurement Value
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	7/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	7/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	6/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	6/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	5/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	5/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	4/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	4/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	3/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	3/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	2/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	2/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	1/1/2017	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	1/1/2017	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	12/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	12/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	11/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	11/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	10/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	10/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
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More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	8/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	8/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	7/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	7/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	6/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	6/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	5/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	5/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SW GP	Snoqualmie	King	4/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				

	Facility Name	Permit Number	Permit Status	Permit Type	City	County	Violation Date	Is Addressed	Category	Type	Parameter	Units	Statistical Base	Measureme Value
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	4/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	3/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	3/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	2/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	2/1/2016	N/A	Monitoring Violations	Analysis not Conducted				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	1/1/2016	N/A	Reporting Violations	Late Submittal of DMRs				
More Info	Snoqualmie Mill Fill Site	WAR303314	Active	Construction SWGP	Snoqualmie	King	1/1/2016	N/A	Monitoring Violations	Analysis not Conducted				

1 Page size: 250

Questions?

Contact: Central Regional Office Eastern Regional Office Northwest Regional Office
Southwest Regional Office Industrial Regional Office Stormwater Regional Office

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Paris Version : 1.1.0.0

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Violation Details

Close Window

Facility Name: Snoqualmie Mill Fill Site
Permit: WAR303314
Category: Benchmark Exceedance
Type: Benchmark Exceedance
Date: 01/30/2020

-

Notes:

Monitoring Data
Parameter : pH (Hydrogen Ion)
Fraction: Not Applicable
Units: Standard Units
Statistical Base: Single Sample
Sample Type: Grab
Non Report Reason: -
BenchMark Min: 6.5 Max:8.5
Limit Min: - Max:-
Design: -
Design Warning: -
Value: 8.69
Violation Override: -

Related Enforcements

The process of tracking how violations and triggers are addressed through the system is new to PARIS. All of the historical violations which were addressed will not have a related enforcement.

Violation Details

Close Window

Facility Name: Snoqualmie Mill Fill Site
Permit: WAR303314
Category: Benchmark Exceedance
Type: Benchmark Exceedance
Date: 10/21/2019

Notes:

Monitoring Data
Parameter : Turbidity (Nephelometric)
Fraction: Measured
Units: NTU
Statistical Base: Single Sample
Sample Type: Grab
Non Report Reason: -
BenchMark Min: - Max:25
Limit Min: - Max:-
Design: -
Design Warning: -
Value: 37.4
Violation Override: -

Related Enforcements

The process of tracking how violations and triggers are addressed through the system is new to PARIS. All of the historical violations which were addressed will not have a related enforcement.

Construction Stormwater General Permit INSPECTION REPORT
Washington State Department of Ecology
Northwest Regional Office

General Data

Inspection Date	Permit No.	County	Receiving Waters	Inspector(s)	Fac Type
11/1/2018	**WAR303314**	King	Snoqualmie River	Evan Dobrowski	**Construction**

Announced Inspection

Weather at time of inspection: Sunny

Discharges to: Surface Water ☒ Ground Water ☐

Facility Data

Name and Location of Site Inspected	Entry Time	
Snoqualmie Mill Fill Site 7001 396th DR SE Snoqualmie, WA 98065	1:45 pm Exit Time 3:00 pm	

Name(s) of On-Site Representative(s)/Title(s)/Phone	Additional Participants:
Ashley Baldwin	

Mailing Address of Responsible Official/Title/Phone and Fax Number.	
Tom Stroufe Brookwater Advisors, LLC 8306 428th Ave Se Snoqualmie, WA 98065-9428	Samples Taken? No Photos Taken? NO
Phone: 425-444-0822 FAX:	

CONCERNS AND RECOMMENDATIONS

- **Repair and maintain Best Management Practices (BMPs).** S9.D.11.a, which states: permittees must maintain all temporary and permanent sediment control BMPs as needed to assure continued performance of their intended function in accordance with BMP specifications.

BACKGROUND

Snoqualmie Mill Fill Site is covered under the General Stormwater Construction NPDES / State Waste Discharge Permit (the General Permit). Ecology's stormwater unit has conducted an inspection at this construction site in the past. The purpose of this inspection is to conduct a compliance inspection per the requirement of the Revised Code of Washington (RCW) 90.48.560 and to provide technical assistance as appropriate.

Inspection Comments

Upon arrival at Snoqualmie Mill Fill Site I met with Ashley Baldwin from Encore Environmental as the property owner's representative and CESCL for the site. At the time of this inspection the site was discharging stormwater within permit benchmark limits and had several types of BMP's installed. The site was not fully stabilized during our inspection and we discussed next steps associated with the sites continued development.

Signatures

Evan Dobrowski Water Quality Program Construction Stormwater Inspector	11-26-2018 Date

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 1, 2017

Tom Stroufe
Brookwater Advisors, LLC
8306 428th Ave SE
Snoqualmie, WA 98065-9428

WAR303314
Snoqualmie Mill Fill Site
7001 396TH DR SE
Snoqualmie, WA 98065

RE: 2016 Discharge Monitoring Reports

Dear Construction Stormwater Permittee:

Your project is covered under the Washington State Department of Ecology's (Ecology) Construction Stormwater General Permit (CSWGP). This permit requires you to sample the stormwater discharge(s) from your project and report the results to Ecology on a Discharge Monitoring Report (DMR). **Monthly DMR(s) submittal is required for the full duration of the permit coverage (from issuance date to termination) regardless if construction activites have started or if there is no off-site discharge of construction stormwater.**

Ecology tracks DMR submittals and follows up with permittees that have not submitted monthly DMRs.

Ecology records show that you had an active CSWGP during January through December 2016 and failed to submit the required 12 DMRs for this period.

According to the CSWGP:

1) Permittees must submit DMRs to Ecology within 15 days following the end of each month (for example – the DMR for June 2016 must be submitted to Ecology by July 15, 2016).

2) If your facility did not discharge during the month, you must still submit the required DMR, checking the box for "No Discharge."

If you did not take a sample for a particular month, check the appropriate reporting code on the DMR (e.g. analysis not conducted).

Ecology relies on complete and accurate DMR information to assess your compliance with permit conditions. Each missing DMR is counted as a separate permit violation. Failure to submit DMRs or non-compliance with other conditions of the permit is a violation of the CSWGP, and therefore a violation of The Federal Clean Water Act and Chapter 90.48 Revised Code of Washington (RCW) - the State of Washington Pollution Control Act. **Failure to submit DMRs or non-compliance with other conditions of the permit may result in issuance of monetary penalties.** Compliance with this notification does not mean you have complied with all permit conditions.

Please note: All missing DMRs must be submitted electronically using Ecology's Electronic DMR System (WQWebDMR) accessed through Ecology's Water Quality Permitting Portal. To find out more information regarding electronic reporting and to sign up for WQWebDMRs please go to: http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html.

Permittees unable to submit DMRs electronically (for example, those who do not have an internet connection) must contact Ecology to request a waiver and obtain instructions on how to obtain a paper copy DMR at:

Washington Department of Ecology
Water Quality Program - Construction Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have questions about how to register for WQWebDMR, please contact Ecology's WQWebDMR staff at WQWebPortal@ecy.wa.gov or (800) 633-6193/option 3.

If you believe this letter is in error or if you need clarification or assistance, please contact Clay Keown at clay.keown@ecy.wa.gov or (360) 407-6048.

Sincerely,

Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

cc: File, Ecology HQ

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 23, 2016

Tom Stroufe
Brookwater Advisors, LLC
8306 428th Ave SE
Snoqualmie, WA 98065-9428

WAR303314
Snoqualmie Mill Fill Site
7001 396TH DR SE
Snoqualmie, WA 98065

RE: 2016 Discharge Monitoring Reports - FIRST NOTICE

Dear Construction Stormwater Permittee:

Your project is covered under the Washington State Department of Ecology's (Ecology) Construction Stormwater General Permit (CSWGP). This permit requires you to sample the stormwater discharge(s) from your project and report the results to Ecology on a Discharge Monitoring Report (DMR). **Monthly DMR(s) submittal is required for the full duration of the permit coverage (from issuance date to termination) regardless if construction activites have started or if there is no off-site discharge of construction stormwater.**

Ecology tracks DMR submittals and follows up with permittees that have not submitted monthly DMRs.

According to Ecology's records, you have not submitted January, February, and March 2016 DMRs and are currently in violation of your CSWGP.

According to the CSWGP:

1) Permittees must submit DMRs to Ecology within 15 days following the end of each month (for example – the DMR for June 2016 must be submitted to Ecology by July 15, 2016).

2) If your facility did not discharge during the month, you must still submit the required DMR, checking the box for "No Discharge."

If you did not take a sample for a particular month, check the appropriate reporting code on the DMR (e.g. analysis not conducted).

Ecology relies on complete and accurate DMR information to assess your compliance with permit conditions. Each missing DMR is counted as a separate permit violation. Failure to submit DMRs or non-compliance with other conditions of the permit is a violation of the CSWGP, and therefore a violation of The Federal Clean Water Act and Chapter 90.48 Revised Code of Washington (RCW) - the State of Washington Pollution Control Act. **Failure to submit DMRs or non-compliance with other conditions of the permit may result in issuance of monetary penalties.** Compliance with this notification does not mean you have complied with all permit conditions.

Please note: All missing DMRs must be submitted electronically by July 24, 2016 using Ecology's Electronic DMR System (WQWebDMR) accessed through Ecology's Water Quality Permitting Portal. To find out more information regarding electronic reporting and to sign up for WQWebDMRs please go to: http://www.ecy.wa.gov/programs/wq/permits/paris/portal.html.

Permittees unable to submit DMRs electronically (for example, those who do not have an internet connection) must contact Ecology to request a waiver and obtain instructions on how to obtain a paper copy DMR at:

Washington Department of Ecology
Water Quality Program - Construction Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have questions about how to register for WQWebDMR, please contact Ecology's WQWebDMR staff at WQWebPortal@ecy.wa.gov or (360) 407-7097 (Olympia area), or (800) 633-6193/option 3.

If you believe this letter is in error or if you need clarification or assistance, please contact Clay Keown at clay.keown@ecy.wa.gov or (360) 407-6048.

Sincerely,

Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

cc: File, Ecology HQ

Letter No. 103

Mark Hofman

From: karen ruppert <kruppert@hotmail.com>
Sent: Friday, July 10, 2020 11:13 AM
To: Mark Hofman
Subject: DEIS Mill Area Development

Categories: Green category

RECEIVED
10 2020
City of Snoqualmie
Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Hoffman,
Thank you for the opportunity to comment on the DEIS.I am focusing my comments on appendix D, the Environmental Evaluation report.
In 7.0 Summary it is noted that direction of groundwater flow can not be confirmed in Planning Area 1 (PA1)without the installation of monitoring wells, it is " anticipated that flow is not in the direction of PA1. I think this needs to be addressed, for potential contamination potential. 103-1
Due to the historical levels of contamination confirmed In areas 2 and 3 , and the statement in the report 9.0, that " contamination may exist in the area of Planning Area 1, that were not investigated...."more evaluation of this area needs to be done.
I believe that the issues of contamination of the entire Mill area are critical and need further review before this plan is allowed to move forward.
Thank you for taking these concerns under consideration.

Karen Ruppert
8567 Falls Ave SE
Snoqualmie
425-831-7443
Sent from my iPad

Letter No. 104

Mark Hofman

From: Anna Boranian <howlin2@gmail.com>
Sent: Friday, July 10, 2020 1:03 PM
To: Mark Hofman
Subject: Mill Site Comment, my concerns
Attachments: DEIS comment paper 2.docx

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Please find attached my comments on the DEIS

Best,
Anna Boranian
41829 SE 66th St
Snoqualmie, WA 98065

Dear Mr. Hoffman and Council,

The purpose of my comments regarding the DEIS is to express my strong opposition to the proposed Mill Site development.

I've lived in the Snoqualmie Valley for over 35 yrs., watching the beauty of this valley being taken away by development. It is very sad and unnecessary. The negative repercussions to the senseless Mill Site development will be irreversible. 104-1

I'm addressing the light pollution in 3.9 of the DEIS.

Light pollution became a problem in the early 20th century, around the time cities began adopting electric lighting., addressing the effects began in the 1950's. Light pollution is a side effect of industrial civilization. The sources include building exterior and interior lighting, advertising, commercial properties, offices, factories, streetlights and illuminated venues, such as an amphitheater, of which all are a part of the Mill Site development.

Plants and animals depend on Earths daily cycle of light and dark rhythm to govern life-sustaining behaviors such as reproduction, nourishment, sleep and protection from predators. Nocturnal animals will be radically affected, as light pollution alters their nighttime environment. We are only beginning to understand what a drastic effect artificial light has on nocturnal ecology. Artificial light also effects the wetland habitat. Wonder why you hardly hear frogs anymore? This proposed development would have a negative effect on all the plants and animals.

Artificial light has a devastating effect on many bird species, every year millions of birds die colliding needlessly into illuminating buildings. Insects are also affected, which negatively impacts all species that rely on food and pollination. 104-2

The findings in the scoping document submitted in 2017regarding light pollution, artificial light increases the risk of cancer, especially breast and prostate cancers. The risk of disease, especially diabetes. Light pollution exacerbates air pollution, as artificial night light drastically slows nightly cleansing, which effects nitrate radicals that break down polluting chemicals in the air that form smog and ozone.

On page 3-226, it is stated design standards should include measures to limit nighttime light pollution or incorporate by reference such standards promulgated by the International Dark- Sky Association (IDA). How will you protect the night sky from light pollution with a proposed Amphitheater?

How will the proposed development be able to minimize the spill over of light glare to avoid significant adverse effects to the out lying community and Mother Nature? Again, there is a proposed Amphitheater.

This proposed development does not adequately take into consideration the protection of wildlife, environment, or human health. The destruction of habitat will displace wildlife, one of the reasons I live in the Snoqualmie Valley. This development is at odds with what makes this Valley a beautiful place to live.

I could continue with many pages about the negative repercussions this outrageous proposed development will have on the valley. If Covid 19 should be teaching us is that Mother Nature and the 104-3

Human race is at a crisis point. It is time Humans stop raping the land and instead preserve for future generations.

This site has historical significance and should be turned into a park celebrating this.

104-4

Even though stated in the DEIS that no species listed as endangered or threatened by state or federal organizations known to occur in the project area, does not mean development should not take into consideration the displacement of any wildlife.

I will fight this to the bitter end to help stop this, the Mill Site development has no place in this valley and does not in any way benefit anyone, but those who will gain financially from it.

104-5

Letter No. 105

Mark Hofman

From: Tim <timjw2@centurytel.net>
Sent: Friday, July 10, 2020 3:03 PM
To: Shared Mill Site EIS; Mark Hofman; Jason Rogers
Subject: FW: Response to Mill Site EIS
Attachments: TW - Response to Snoqualmie Mill DEIS.pdf

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Mr. Hofman,

Attached is my response to the Mill Site Draft Environmental Impact Statement.

Please acknowledge receipt.

Tim Welborn

July 8, 2020

Tim Welborn
5540 396th Drive SE
PO Box 399
Snoqualmie, WA 98065
425-495-2910
Timjw2@centurytel.net

Mark Hofman, Community Development Director
City of Snoqualmie
PO Box 987
Snoqualmie, WA 98065

Reference: Snoqualmie Mill Planned Commercial/Industrial Plan
Subject: Response to Draft Environmental Impact Statement

Dear Mr. Hofman;

Please accept my response to the Draft Environmental Impact Statement.

Background: I have lived at 5540 396th Drive SE Snoqualmie WA since 1993. My property is located approximately one third mile northeast of the east boundary of Snoqualmie Mill Annexation area. The property is several hundred feet higher than the annexation area. From the south east edge of my property I look directly down on the Annexation area and listen to Dirt Fish vehicles every day including weekends.

I have corresponded multiple times with the City of Snoqualmie in the past regarding complaints that DirtFish was not complying with operating terms and conditions of the Annexation agreement. This correspondence took place with yourself, City Attorney Bob Sterbank and the Chief of Police. From my perspective, the City demonstrated a clear preferential bias towards Dirt Fish and Snoqualmie Mill Ventures allowing DirtFish to continue operating in conflict with the aforementioned conditions.

While I was disappointed in the City's response, I was not surprised. The City displayed this bias throughout the entire Annexation process including a general disregard for the rights and opinions of citizens that are legitimately concerned about how this development will impact their community.

Considering that the same cast of characters are involved with the development of the Environmental Impact Statement, forthcoming development agreements including the enforcement of terms and conditions included in these agreements, I am beyond skeptical that any development can occur on this property without adversely impacting our community.

Our Neighborhood Excluded from DEIS: There is no direct or indirect reference to my specific neighborhood in the DEIS. There are dozens of private residences located to the northeast of the subject site, some within a third mile of the site including my property. Neither myself or my neighbors believe this is just a coincidence. Evaluation of adverse environmental impacts associated with noise,

105-1

aesthetics, lights and glare included in the DEIS are incomplete without fair evaluation of my property and of my neighbors. 105-1

Insufficient Description of Final Use: Neither the Developer's Consultants nor the City can fairly prepare and evaluate the Draft Environmental Impact Statement (DEIS) when the potential uses of the property are so broad. While Planning Area 1 has been fairly outlined, the uses for Planning Areas 2 and 3 which constitutes the majority of the development are wide open. Commercial, business, manufacturing, light industrial and industrial uses of Areas 2 and 3 are referenced throughout the DEIS.

The differences in impact between these identified uses of the property can be significant. Of equal concern is how the impacts can vary between businesses in the same category of use. For example, will any of these businesses work around the clock? Are there activities that take place outside? Will their activities result in odors or emissions such as co2 that cannot be effectively mitigated? What about traffic, noise, lights and glare? In the absence of specific detail, to simply state that all development will have to meet local codes and requirements is irresponsible and does not address the potential cumulative adverse impact that a development of this size can have on the community. 105-2

It is the City's obligation to insist that the DEIS accurately describe potential adverse impacts resulting from worst case uses in Planning Areas 2 and 3 (which it does not) rather than its current focus on the glitter and glamor of the planned use of Planning Area 1. Now is the time to fairly evaluate potential adverse impacts while the City has leverage. Bottom line, manufacturing, light industrial and industrial uses of the property can result in significant adverse impact that cannot be effectively mitigated. All one has to do is to look at other similar areas within the greater Seattle region to understand the adverse impacts these activities can have on our community.

Outdoor Performance Space: The inclusion of an outdoor performance space in the proposed alternate is a transparent attempt by the developer to coerce the City and public towards the developer's preferred use of the property. I'd like to think that the City was not part of this plan to steer the public. This lost leader if you will, would have significant adverse impact to the entire upper Snoqualmie Valley and would never pass honest scrutiny by the City. If there are any questions about how outdoor music venues can adversely impact communities, the City only needs to review its own records of complaints resulting from the Snoqualmie Casino music concerts. If questions remain, there is ample information contained in the internet regarding adverse impacts to the community surrounding St. Michelle Winery's music venue in Woodinville. Competing simultaneous music concerts from the Casino and Mill site would result in a cumulative adverse impact that no responsible person within the City can look past or justify. 105-3

Aesthetics, Light, and Glare: Despite the rhetoric included in the DEIS in section 3.9, you can't hide dozens of buildings up to 55' tall, nor the adverse impact resulting from the lights and glare. Perhaps a sixth grader in Modesto California could believe this but most residents of Snoqualmie including the hundreds of thousands of visitors will not. I will be able to see the majority of buildings included in the development from my property. 105-4

The significant increase in ambient glow from nighttime lighting of the development will be evident to the majority of residents of the upper Snoqualmie Valley. Depending on the extent of cloud cover, my property including many of my neighbors will be illuminated by the ambient glow during hours of darkness including our living spaces.

In Section 3.9.4 Significant Unavoidable Adverse Impacts, the writer correctly asserts that changes to the visual character and lighting conditions on the property will be significant particularly in Planning Area 1. The writer then incorrectly asserts that these changes would occur within the context of an historical industrial site and therefore is not considered adverse. This is broad reach by any standard. Planning Areas 1 and 2 were utilized for log storage not 55' buildings, lights, glare etc. If the Developer wants to use this argument as justification for their development, then develop Planning Area 3 and leave areas 1 & 2 alone. 105-4

Noise: Information and conclusions contained in the noise section of the DEIS is incomplete at best and fails to address potential and realistic noise impacts associated with the development.

The most glaring omission is the writer's failure to acknowledge and address potential noise sources and their impact from Planning Areas 2 and 3. The writer suggests that the actual uses in Planning Areas 2 and 3 were unknown at the time of writing. As a result, the writer provides the opportunity to create what should be considered an incomplete and misleading noise model and study.

Furthermore, the writer is also able to create a noise model that excludes any noise resulting from business activities within Planning Area 1 because it is anticipated that these activities will occur solely within the buildings. The writer further excludes consideration of any noises resulting from traffic on public streets associated with Planning Area 1 because the writer incorrectly assumes (for the purpose of the DEIS) that noises generated from public streets can be excluded because they are exempt.

As indicated earlier, the final uses of Planning Areas 2 and 3 cannot be overlooked or pushed to the side for the convenience of creating a less offensive DEIS. Some tenants in these areas will likely produce outdoor noise generating activities including the potential for night time noise generating activities as well. Bottom line, neither the Public nor the City have any means to recognize the potential adverse noise and other impacts associated with the use of over two thirds of the development. Consequently, the only defense against adverse impacts are constraints imposed by City or County codes on a permit by permit basis which does not allow for consideration of accumulated impact. 105-5

Noise considerations associated with the Outdoor Performance Space and included in the DEIS should raise many questions from the City as well as the public.

The writer acknowledges that noise increases over ambient could be as much as 20db(A) and significant. The noise model predicts the maximum noise level experienced at one receptor at 56.9db(A) or 0.10db(A) below City and County threshold limits (commercial to residential). My own personal opinion is that had the writer chosen my property as a receptor, the maximum noise level prediction would be similar or greater than the maximum predicted noise level however, with a lower threshold limit of 55dbA.

The writer has failed to acknowledge King County Code 12.86.410 Public Disturbance Noise, which elements of this code fit the noise impacts generated by the outdoor performance space. Specifically, KCC 12.86.410 which defines "public disturbance noise" in part as "any sound that unreasonably disturbs of interferes with the peace, comfort or repose of a person or persons. Further, the code also states in part that "a noise need not exceed the maximum permissible sound levels of this chapter or be a public nuisance noise in order to be a public disturbance noise. This KCC code perfectly addresses adverse impacts associated with the proposed outdoor performance space.

The writer indicates that enclosing the amphitheater will mitigate noise levels. Will the developer commit to this mitigation effort? The writer also indicates that the City may issue noise variances if noise levels will exceed permissible levels. If either of these options are a possibility or probability, then the DEIS needs to address these measures or actions in a more concise manner.

105-5

Closing: While my responses to the DEIS are limited to my general perspective with focus on aesthetics, lights, glare and noise, I believe that similar oversights and product manipulation are contained in other critical elements of the review. It is my hope that other interested individuals or perhaps even the City will address.

In my opinion, the DEIS is incomplete without fair evaluation of the entire development which includes the anticipated final use(s) of all three planning areas. Further, reliance on City Codes to evaluate maximum threshold impacts on a project by project or building by building basis circumvents the Developer and City's obligation to fairly consider the adverse impacts of the development as a whole which I believe cannot be effectively mitigated.

Sincerely,

Tim Welborn

Letter No. 106

Mark Hofman

From: Mark Sollitto <marksollitto@gmail.com>
Sent: Friday, July 10, 2020 3:10 PM
To: Mark Hofman
Subject: Snoqualmie Mill DEIS Comments
Attachments: Snoqualmie Mill DEIS Comments.docx

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,
Attached are my comments on the Snoqualmie Mill DEIS.
Please include me as a party of record (via email) for this project.
Sincerely,
Mark Sollitto
206.595.4797

7/10/2020
Mr. Mark Hofman,
City of Snoqualmie
Community Development Director

Dear Mr. Hofman,

Below are my comments on the Snoqualmie Mill DEIS. The opinions expressed here are my own. Please add me as a party of record so I may be informed of future actions by the City on the Mill site.

For over 100 years, the Snoqualmie Mill operation culturally and economically anchored the Snoqualmie Valley. The Snoqualmie Falls Lumber Company and subsequently Weyerhaeuser produced a variety of timber products for the NW's insatiable appetite for timber to build with, it was a dominant force in the Valley driven by family wage jobs.

Over that 100 year process, the Mill site was "ridden hard and put away wet." The Mill site was graded extensively and repeatedly to construct buildings, kilns and to store logs. Borst Lake, a former Snoqualmie River channel, was dredged to store more logs, and an overflow pipe was build to connect the Lake to the Snoqualmie River.

As a result, the Mill site suffers from an array of existing and complicating conditions that must be identified and evaluated fully under SEPA, GMA, Shoreline Management, the Model Toxics Control Act and the King County Flood Hazard Reduction Plan.

Project Phasing:

Based on past industrial forestry operations, the Mill has been cited for clean up under the Washington State Model Toxic Control Act for lands in proposed Phase 2 and Phase 3. Toxic's on site include PCB's and a suite of other toxic chemicals. The FEIS should evaluate deferring approval of phase 2 and 3 or address the environmental and economic impact of delaying any City approvals for design and/or construction on Phase 2 and/or 3 subject to those sites being first cleaned up and certified as such by DOE. 106-1

Floodplain/Floodway:

The mapped boundary between the floodway and floodplain arbitrarily follows the southern boundary line of tax parcel #2924089009 on the edge of Borst Lake. Water does not recognize parcel boundaries. Actual flood events that I have observed from 396th pushes the floodway north to include the southern half of this parcel and the southern half of Parcel # 2924089006, Parcel # 3024089001 and Parcel # 3024089069. 106-2

This King County Imap aerial from 1990 illustrates flooding on Reinig Road and Mill Pond Road adjacent to the Mill site at the Meadowbrook Bridge. https://your.kingcounty.gov/dnrp/library/water-and-land/flooding/photos/DVD17/00015_p_10aenegtf80015.jpg

106-2

Flooding:

The Snoqualmie River system is the largest in King County. The Mill site is located just below the confluence of the Middle, North and South Forks of the Snoqualmie River. The Mill site is located just upstream of historic downtown Snoqualmie. The DEIS claims that the imperious surfaces on site will generate 100,000 cubic feet of runoff which will be offset by the addition of 150,00 cubic feet of new flood storage capacity. The FEIS should include a map that identifies the parcel location and capacity of all mitigating storage constructed on site that totals 150,000 cubic feet. Given its proximity to the confluence of the Three Forks and Downtown Snoqualmie, I am highly skeptical that the 1.8 million sq. feet of commercial/office and the 160 apartments as proposed won't add to flooding in historic Downtown Snoqualmie.

106-3

The FEIS should include a site map update, with supporting text, that identifies channel migration hazard areas and 2020 floodplain and floodway boundaries. King County operates a regional, countywide flood utility with professional engineers that should be engaged to assist in the generation of this refreshed data that should be based on the historic flood levels that have hammered both the Upper and Lower Valleys over the last 50 years.

Parcel # 3024089004 is 38.70 acres and undeveloped. The FEIS should evaluate the feasibility of permanently protecting this parcel unaltered for flood storage to protect historic downtown Snoqualmie.

Sensitive Areas:

Nearly the entire site has been identified as an environmentally sensitive area per those areas defined by the King County Critical Areas Ordinance (2005) and Sensitive Areas Ordinance (1990) within King County, WA. These are illustrated on King County's Imap folios. The Mill site includes erosion hazards, seismic hazards and wetlands. The FEIS should map and identify specific mitigation strategies to protect its sensitive areas. The consultants need to show their work in the FEIS.

106-4

Sewage Treatment/Water Quality:

The development as proposed cannot currently be supported by the existing City sewage treatment plant. The DEIS assumes that future rate increases will be automatically imposed to cover these costs. The FEIS should identify the specific alternatives under discussion at the City to deal with the BOD issues created by the proposed wine making facilities including estimated utility rate increases over 10 years to existing residential and commercial customers to fund the plant improvements being driven by the applicant.

Any future development approval at the Mill site should be conditioned first on an expansion and enhancement of the plants operation to resolve the BOD issues at the Mill site.

106-5

Regional Context:

The DEIS ignores the adjacent regional conservation system that includes a key missing link, the Snoqualmie Mill site. The DEIS focuses only on open space identified as "Near" the Mill.

The FEIS should include maps with supporting text that illustrate the very unique regional conservation landscape. It should include the face of Mt. Si, all of Three Forks, Mountain Meadows Farm, Meadowbrook Farm, Tollgate Farm Park and Snoqualmie Point. This map with supporting text will demonstrate the strategic location of the Mill and its proximity to historic downtown Snoqualmie.

106-6

To Close:

This is a very complicated and costly project due to its location and site conditions. The proposed 1.8 million sq.ft. of commercial/office space and 160 apartments would be better located out of the floodplain in other parts of the City that are not so constrained. The FEIS should consider a program that could move the density from the Mill Site through either a development agreement (Snoqualmie Falls Agreement) or via a land use incentive like an in City Transfer of Development Rights Program. Either of these actions could move the density to property neither so polluted nor so constrained.

106-7

Thank you for the opportunity to comment. Please contact me if you have any questions.

Signed/Mark Sollitto
3606 24th Ave. S
Seattle, WA 98144
marksollitto@gmail.com

Letter No. 107

Mark Hofman

From: Sharilyn Lux <luxlanguages@gmail.com>
Sent: Friday, July 10, 2020 3:18 PM
To: Dick Scheel; Mark Hofman; Sharilyn Lux
Subject: Public Comment on DEIS of Millsite Plan

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Mark Hoffman

City of Snoqualmie

This letter is in response to the DEIS submitted to the public for comments.

Upon review of the document, there are several areas of interest that raise concern in the DEIS:

1. The lack of shoulders on Mill Pond Road, as well as the lack of consistent shoulders on Tokul Road and surrounding roads with direct access to the Mill-Site are of major concern. Which leads into safety in the Valley.

This lack of shoulder creates concerns for safety, specifically the ability for a person walking to be hit by a car. There is an example in Snoqualmie on StoneQuarry Road that demonstrates this danger, which resulted in the death of Lucinda...In honor of her, one should take into consideration the need for the shoulder and the misinformation provided in the DEIS. https://mynorthwest.com/26800/man-charged-7-months-after-fatal-north-bend-hit-and-run/?

107-1

The sentiment listed in this article should also be focused on, an issue in the community affecting safety, people who help cover crimes from friends, in Snoqualmie. And the inability of the police department to match the suspect to the scene of the crime. It should also be noted that the suspect's family are friends with the Mayor, and there is a consistent pattern of an inability to file charges with King County Prosecutor, if the crime occurred in the jurisdiction of Snoqualmie, especially if Mayor Larson has interest on either side of the crime. The FBI outlines how cities use the crime statistics that they produce and on the first page, you will note that Chamber of Commerce's use them. The exact point of why Mayor Larson is misusing this data is outlined in this report, as is the City of Snoqualmie's misuse of the data. This document very clearly defines that those statistics should not be used alone and why. So, how else is the City of Snoqualmie considering themselves the "safest city?" Rape victims that topple these numbers, along with all other victims of major crime in Snoqualmie and North Bend can attest to just how inaccurate these statistics are and how Mayor Larson is misusing the statistic, specifically with the Chamber of Commerce. https://ucr.fbi.gov/ucr-statistics-their-proper-use

This same issue existed in the brutal assault of a Snoqualmie, single mother, nearly beaten to death in downtown Snoqualmie in Feb. 2019. Unable to locate a suspect, because due-diligence was not done by the Snoqualmie Police Department, and there is a conflict of interest between the Mayor and the victim. Incident #19S-0788 Snoqualmie Police, File #033665215

The same issue is demonstrated with the theft of the public committed by Rodger McCollum at the Snoqualmie Valley Hospital. The City Council of Snoqualmie has been provided his discharge document that should have been submitted to the King County Prosecutor by the Snoqualmie Police Department. Mayor Larson has lied about this incident to no end, and tried to discredit the whistleblower, the assaulted victim in Feb. 2019, to no end.

The inability of the Snoqualmie Police Department to maintain a safe community and the lack of ability to handle major crimes was demonstrated in the violent rape of a woman in North Bend, the week Snoqualmie Police took over jurisdiction. It was further demonstrated by the wrongful arrest that followed. And more disappointing, is the still unsolved crime. The victim has spoken openly about the mishandled DNA, the poor experience and treatment from the Snoqualmie Police Department and much more. It is interesting that crime increased in 2017, the year Chief Phipps came on, and has gone flat and to the "safest city". Violent crime had an increase in 2017. https://www.macrotrends.net/cities/us/wa/snoqualmie/crime-rate-statistics. The safest City is only based on crimes not properly prepared by the Snoqualmie PD to reach prosecution. https://ucr.fbi.gov/crime-in-the-u.s/2016/crime-in-the-u.s.-2016/tables/table-6/table-6-state-cuts/washington.xls. And it is extremely clear the city is doing all that it can to keep crimes off this chart, my keeping them not prosecutable. And they fail to include the other half of their jurisdiction, North Bend, with higher crime rates, in the "safest city" statistics.

https://www.seattletimes.com/seattle-news/investigation-continues-into-north-bend-rape-stabbing/https://www.kiro7.com/news/suspect-arrested-north-bend-sexual-assault-stabbin/81795888/

107-2

False arrests, more than one, and against minorities in the jurisdiction of the Snoqualmie Police Department . Not a place to invite thousands of people. https://komonews.com/news/local/n-bend-stabbing-suspect-cleared-released. Most recently we learned of the Soldana Family, that experienced a possible false arrest by Snoqualmie Police Department at the North Bend Outlet Malls. They met with Police Chief Phipps about this last week. Many people are enraged with our Police Department about the incident. These are only the ones that make the media. The City PIO and Police PIO steered the media away after the brutal assault in Feb. 2019.

The inability of the Police Department to handle major crimes, being an issue of public safety was again presented in March, there seem to be no lead on the dead body found in downtown Snoqualmie, in the River, where Millpond would flow into, during a flood.

https://livingsnoqualmie.com/update-regarding-body-recovered-from-snoqualmie-river-near-sandy-cove-park/

This is not a place to be inviting people to drink, where they will fall victim to crime by a police department that lacks the proper training (we are not talking about military training, we are talking sexual assault training, DNA handling training, de-escalation training), structure, or desire to solve crimes. The City of Snoqualmie has been providing crime statistics that have come under scrutiny. And the FBI itself warns against using them, as they are. And as most of us know very well, and understand very well, crime statistics are historically skewed by agencies and localities trying to hide the image of crime for multiple purposes. The reasons for "white washing" crime in Snoqualmie seem directly related to development interest, trying to sell homes, and attract families. Instead of fixing the problems, the City has taken the route of hiding them. And it is greatly failing. What was the disposition of this situation? Person appearing drunk, causing an accident on Millpond Road. https://livingsnoqualmie.com/fire-blotter-car-vs-pole-on-millpond-possible-trash-burn-motorcycle-vs-car-in-front-of-city-hall/

The Snoqualmie Police Department has also used information that lacks all credibility, the lack the training to determine and use information correctly, impeding justice, specifically to deal with crowds, such as was

displayed with the Black Lives Matter protest in town. Why did they think this man was credible? He wasn't. https://www.nytimes.com/2020/06/22/technology/antifa-local-disinformation.html

The Department of Justice can help clean up the issues and oversight that could result in crimes committed in Snoqualmie being able to be prosecuted, because detectives would present cases that can be prosecuted. This is not something Mayor Larson wants. He wants to hide crime. Until the City gives the police contract to the King County Sherriff or the DOJ takes action on Snoqualmie Police Department, it is a danger to bring visitors here, and the danger is created under the direction of Mayor Matt Larson.

Need for a SAU with officers that come without issues. Detective Bruton came from the Redmond Police Department and had a lawsuit against them. Mayor Larson failed to mention he ever worked there when he announced his first detectives that he "hired". https://livingsnoqualmie.com/snoqualmie-police-department-names-its-first-detectives/

He can file sexual harassment charges against Redmond PD, but not capable of properly handling a sexual assault investigation. Why is he a detective? Or handling DNA? Any detective knows you don't bring DNA back to the PD for 30 days before taking it to the crime lab. What kind of evidence handling for DNA exists at the Snoqualmie Police Department? We know they have a dirty shooting range inside. Where parents have gone on tours and complained about unsecured guns and ammunitions on tours. What else is not cared for inside the big, overly fenced, military like complex?

Why does Mayor Larson hide so much important information? Is it misleading, or lying?
https://livingsnoqualmie.com/snoqualmie-police-department-names-its-first-detectives/

Because Snoqualmie does not have clear police hiring process, in accordance with state regulations, we have officers who can not deliver justice. Detective Bruton failed to interview key witnesses, multiple, he refused shall we say, he was given the names several times, in a major assault in Feb. 2019. Where is he getting his instructions from to refuse to do a complete investigation? To refuse to follow up on evidence, such as videos to be preserved, and to refuse to interview a witness that came to the station? Refusing to protect and serve.

Snoqualmie hired Nick Hogan who came with issues before he was hired, he never should have been hired. Why was he? Who was the favor for?

https://www.nydailynews.com/news/national/officer-jail-pepper-spraying-restrained-man-hospital-article-1.3004

Another example of the City of Snoqualmie government negatively asserting themselves in the lack of administration of justice, major crimes, and unsafe road conditions with drunk drivers, is this case. https://www.valleyrecord.com/news/no-charges-filed-against-mother-in-sons-death/

She is still a City Employee, AKA Debra Vigil, the City administrator accompanied her to delay a breath or blood test, to keep this off the crime register and her from facing the proper prosecution for the crime. She is now head of the HR at the Snoqualmie Police Department., according the the Snoqualmie Police in May 2020. Her other surviving son is the bartender at the local establishment, where women leave and report rapes and ruffies. Many women. Where are those in the rape numbers reported to the FBI? How many DUIs originate from this one location?

Snoqualmie has not been able to demonstrate that they have any process of hiring qualified police. The Civil Service commission has been well documented, as being out of compliance with MSCR codes for quite some time, specifically in the January 2020 meeting. Chief Corriera is recorded lying about the commission being

full. Currently they say they are not doing anything until they have a full commission. People have applied. Mayor Larson must be looking for people he knows will allow the lack of justice to continue under him. The person listed on the City website to contact for Police jobs has been gone for months, Deanna Mills.

The possibility of accidents arising from increased traffic, is further burden that this current lack of safety puts on the local police departments, and other taxpayer funded institutions. The hit and run investigation or lack of on Stone Quarry road, costs the taxpayers greatly. The investigation did not produce a suspect. There is a very clear pattern of the City of Snoqualmie Police lacking the ability to produce a suspect for major crimes, this is well documented. Until this issue is resolved via the Department of Justice or reassignment of the jurisdiction of the mill-site and the Snoqualmie Police should be given to the King County Sherriff's Office, with more experienced Detectives and Major Crimes investigators.

We note several issues on the on-ramps that would access this site in just one single report. https://livingsnoqualmie.com/fire-blotter-car-vs-pole-on-millpond-possible-trash-burn-motorcycle-vs-car-in-front-of-city-hall/

107-2

The City of Snoqualmie police department has, as a pattern, has mishandled DNA on numerous occasions, and therefore pose a safety treat to the public. Bringing 5000 people to travel on dangerous, inadequate roads, with the with the local PD would be a further liability to the taxpayer in the City of Snoqualmie, and would create the groundwork for further possible lawsuits, against the City of Snoqualmie, and thus tax payer. Especially if they stop at one of the local establishments, open late, on the way out of Snoqualmie that is well known for ruffies and rapes. The establishment with several over-service violations, including court issues with Bartenders, PRR's from the Washington State Liquor and Cannibis Board.

Where the police take victims after report of rape to the Snoqualmie Valley Hospital, which does not have a SAFE nurse. They never should be brought there. Yet another problem with the Snoqualmie Police Department that is well documented.

Unknown cause of death on Mill Pond Road last year, Ty Olsen. https://www.valleyrecord.com/obituaries/ty-ryan-olson/ Local media sources first, erroneously reported a head on collision.

Dead body found in the River within this last year, with no leads or information, that during floods, joins the water of Mill Pond Road. Resolution of the case? Or is it another one that has yet to be solved by Snoqualmie Detectives? https://livingsnoqualmie.com/update-regarding-body-recovered-from-snoqualmie-river-near-sandy-cove-park/

As the Police Department operates at the moment, they are not only a public safety hazard, but a huge financial liablity to every tax-payer due to their wrongful arrest, inability to file charges on major crimes (McCollum, rapes, etc), choice to not file charges on crimes that put others at great risk, etc.

2. Fire and Public Safety

In addition to insufficient police services to support the site for further development at this time, it has been mentioned that there are insufficient fire services available for the Mill-site, such as a ladder truck.

107-3

3. Unresolved issues at the East and West Bound Entrances of I-90. In 2013 Mayor Larson along with a state representative on the Transportation committee stated the need to move the weigh station to ease traffic congestion at the interchange that would be used to access this development site. https://livingsnoqualmie.com/state-rep-rodne-

107-4

107-4

asking-budget-move-weigh-station-fix-traffic-headache-entering-90-snoqualmie-parkway/ In 2013, the cost was estimated around 3 million to move the weigh station. The ideas proposed by the Mayor and others seems to have had no resolution or progress in 7 years, only worsened and more dangerous traffic conditions at this interchange. In 2015 there were claims that the dangerous I-90 on-ramp would get funding and fixed. We have yet to see that happen. Where did the money go? Or was this funded?

https://livingsnoqualmie.com/good-news-for-i-90sr-18-improvement-project-house-adds-to-transportation-package/

107-5

4. Need to reassess traffic studies leading to the proposed millsite. Both studies in the report were gathered at inappropriate times, to reflect the true traffic. The traffic study in 2018 was done during a major snow-storm. The study done in 2020 appears to have been done during COVID, lacking accuracy to the true traffic when the high-school, on the route to the proposed development site is located, along with all of the other factors that are impacting heaving traffic close to the proposed millsite. The reported peak times in the traffic portion of the study were inaccurate and did not take into account the actual highest peak in traffic, when the highschool lets out in the afternoon, which was not included in the peak time in the study. The peak study did not include the release of any schools. Including the 10+ minute backup that happens when school is in session at the intersection of Swenson on Snoqualmie Parkway, to take a right turn off the parkway to access Timber Ridge, when school dismisses, outside of the listed peak time included in the DEIS.

5. The need for A more accurate traffic study that accurately reflects the actual traffic during normal times, for example, not during the COVID close down of schools and while people are working at home, and not during a snow storm that shuts down businesses, schools, etc.

6. A more accurate traffic study may lead to the need for a full light on Fisher Avenue, as well as traffic control on Railroad Avenue and other locations that do not currently exist.

107-6

7. Lack of sufficient water for the site, we have water issues currently, and unexceptable water rates for the consumer, while there are lower rates for commercial users. And the state auditor has pointed out an issue with the water billing system. There is no oversight or process for reconciliation of water bills. To the extent that one customer recieved $10,000 in free water. Who was that? The citizens can not and will not be supplementing the water system financially for businesses and friends of the Mayor.

107-7

8. The one lane bridge on Meadowbrook AVE is not addressed in the study. Meadowbrook is inaccurately described as a two lane road. The bridge has one way only traffic, with a light for control of the direction the bridge operates.

9. What will the cost of the new bridge on Meadowbrook be? And will that be incurred in entirety by the project at the MillSite, not the tax payer?

10. The bridge approaching the Tokul roundabout is also in need of replacement to support the traffic to arrive at the proposed development site. That would need to be replaced prior to the increased traffic for safety reasons.

107-8

The biggest issue with the Mill-site development plan, other than ruining a beautiful, environmentally sensitive area, is safety in the "Safest City". Which is simply not as safe as the Mayor, claims. And this matches many of his well documents lies. It matches the behavior of those he keeps close at his side, such as Rodger McCollum, who was also let go from the hospital for "lying to the media." Quite the problem in Snoqualmie. Lying to the media, as is well documented, and it affects the honest tax paying citizen, while Larson assures his friends are not prosecuted.

The above article from the FBI clearly states that the crime statistics alone should not be used. And it appears they are the only thing that the City is using to produce their figures. They are producing those figures by ensuring crimes are not suited for prosecution. The infrastructure, the roads, are improperly represented in the DEIS, as are the crime statistics

107-9

that are produced by the City. Mark Hoffman, a City Employee produced information in his cover letter of the DEIS that does not match the DEIS itself, it is essentially false information. As are the statistics on crime. Just ask the victims and survivors of crime. And look at the criminals listed above that have not been properly prosecuted do to a failed local police department, without properly trained detectives, without the ability to follow IACP protocol on DNA handling. DNA does not go back to the Snoqualmie Police Department, as it did last year, from a hospital, to the PD for over a month, then to the crime lab. No, that is not the way trained detectives handle DNA. Any trained detective knows it goes directly from the hospital to the Washington State Crime Lab. All under the direction of Mayor Matt Larson. The citizens deserve honesty and transparency, from the Mayor and the City Employees we pay. The cover letter to the DEIS, prepared by a City Employee is inaccurate. Why?

107-10

Why does the Snoqualmie Police Department bring DNA back to its department, instead of to the crime lab? Especially when the Mayor doesn't like the victim, because she whistle blew on his friend Rodger McCollum, who still has yet to be prosecuted for using public funds for himself personally. We see the pattern of the local police department doing the same, lavishly spending public funds, to a very high rate. Public Records Requests. That Bob Sterbank has wasted City Funds to try to curb, to protect people, like Rodger McCollum, and all other mis-users of public funds and power.

It seems Mayor Larson believes this is still a company town, owned by himself. There are reasons his friend controlled the hospital, it helps him assure curbed crime statistics, when the hospital sends the women away with no report.

Snoqualmie is not suited for further development, until the DOJ takes a close look at why this has always been a place of little respect for women and minorities, even a common dumping ground for a noted serial killer. It has always been clear how crime is handled here.

No, bringing others here to fall victim of poor policing, run by a Mayor who likes to keep it that way, is not a good idea. Look at the false arrest of a black girl at North Bend outlet Mall last year. Where is the public apology by our PD and Mayor? This project could bring lots of future victims and could bankrupt the city government, from performing the duties it is meant to do. It is time to put safety before the Mayor's self-guided interests, backed by stacks of misinformation.

Where is that "boutique hotel" that caused division of the community? This is another waste of our tax money for Matt Larson's personal friends to overspend our municipal funds exploring this project. It should all be done without the use of a City Employee, that has provided inaccurate information, as a sum-up of the DEIS. This is unacceptable.

107-11

Sharilyn Lux

Letter No. 108

Mark Hofman

From: Denise Di Santo <dldisanto725@gmail.com>
Sent: Friday, July 10, 2020 4:00 PM
To: Mark Hofman
Subject: Mill Planned Commercial/Industrial Plan DEIS comment
Attachments: DEIS comments_DD.pdf

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Hoffman,

Please find attached comments for the Mill Planned C/I DEIS.

Thank you
Denise Di Santo

425.577.1889
dldisanto725@gmail.com

City of Snoqualmie

P.O. Box 987 Snoqualmie, WA 98065

(via email dldisanto725@gmail.com)

Attention: Mark Hofman, Community Development Director

July 10, 2020

RE: Snoqualmie Mill Planned Commercial/Industrial Plan Draft Environmental Impact Statement

Mr. Hofman,

After reviewing the Draft EIS for the proposed Mill planned development, I have many concerns as a resident of Snoqualmie. First, this DEIS was released during a broadly and intensively impacting pandemic that caused disruption for many. I oppose the timing and resultant constraints put on the community since the process has not allowed time and focus for proper and adequate assessment by residents, other primary stakeholders, tribal government, and public entities. Secondly, the lack of information for Phases 2 and 3 provides a compelling case for the impacts to be addressed so that a proper assessment can be made under one development proposal. Third, I am very concerned that the legacy contamination of this site and adjacent areas has not been adequately assessed for potentially devastating effects on land, soil, and water quality. This needs to be reconciled in an EIS for any proposed development of the Mill Pond area. And fourth, alternatives for the proposed development are not adequately characterized as required under SEPA and NEPA. The lack of information and consideration presents a risk to the City in terms of future resilience and growth, livability, and importantly, the ability to provide clean water to citizens, and critical river and riparian habitat for endangered and threatened salmonid and terrestrial species. 108-1

There is not enough information in the DEIS for Phases 2 and 3 to make assertions contained in the document. Information for Phases 2 and 3 need to be contained in an EIS so that informed decisions can be made and not be a done deal under Phase 1. I believe that the temptation exists for any development phases following Phase 1 to proceed without adequate environmental impacts assessment. Therefore, an EIS for these areas proposed for development must present adequate level of detail in any future EIS and should reference Phase 1 adequately to make realistic and informed decisions about what land use and build out is acceptable on these sites. 108-2

Transportation impacts and associated costs are not addressed adequately and realistically in the document. Traffic data are insufficient to characterize the impacts to roadways in and around the city. Given the time of year and days and times data was collected, this does not represent the increased traffic associated with the nature of uses proposed. Associated degradation of air quality and stormwater runoff, and significant increase in noise pollution during and post construction will need to be assessed, and mitigation for these impacts also must be addressed in an EIS. There is already an issue with construction vehicles dropping debris on vehicles using the parkway and adjacent roadways; the City's response to these current conditions is already woefully inadequate for the protection of other 108-3

road users. Policing needs will certainly be impacted with an increased need in these services, and this impact is not addressed in the DEIS. Costs and benefits of increased traffic, and transportation needs are not weighed fully in the DEIS. What are the costs and who will bear the costs of new transportation infrastructure that will be required to support the development? The DEIS does not contain this analysis, but is necessary for informed and responsible decision-making. 108-3

The contaminated site and potential impacts of excavation and development of the site are also of concern, particularly since the Snoqualmie River will be the receiver of direct discharge from the site, at least as proposed. Ground and surface waters are likely to be impacted. Where is the monitoring and mitigation plan to address this risk to water quality during construction activity and post development? I expect that a more thorough investigation and risk to the City as a potentially liable party to this contaminated site would be helpful, not only for transparency, but for assurance that water and soil contaminants are not going to be conveyed to groundwater or the Snoqualmie River. Excavation of existing berms is required; how will this be addressed in flood levels and contamination conveyance? The existing fill presents another risk during a tectonic event which is a reality not taken into consideration in this draft document. The deepest fill soils are generally located in Planning Area 1 and the northern central portion of the site (Planning Area 2); both areas were used historically for log storage. The remnants of several earth berms are located along the north and west perimeters of the site. These berms are required by Annexation Agreement and the Annexation Implementation Plan to be graded and removed. Compensatory storage needs to be considered in this context as well. This must be assessed in any future EIS. 108-4

Virtually the entire site is within the floodplain of the Snoqualmie River. A portion is in the moderate channel migration zone, which presents another and avoidable risk, with added potential costs. How does this affect FEMA's CRS rating for the City? In general, residential development in flood-prone areas is not considered a best practice and residential use is called out as an element in the proposed Phase 1 development. There needs to be a much larger setback to the River and protective buffers provided. Plans should reflect for this need, not only for flood protection, but to protect critical stormwater management facilities. Therefore, how will the removal of fill and berms affect flooding potential? Is this reduced land elevation considered or accounted for in the flood elevation and planning for the site? It doesn't appear to be from the sections I have reviewed. 108-5

The DEIS states "...project does not technically meet King County's thresholds for Large Site Drainage Review nor are many of the technical elements applicable." This statement is based on applying the direct discharge assumption, and on the three sites which do not have the detail, so this is like comparing apples and oranges. In other words, it seems inappropriate to use the whole site in this analysis when there is not any detail provided for the second and third phases. Only base this analysis on Phase 1, which would implicate the direct discharge applicability and the amount of new impervious cover since a large percentage of new impervious surface would be concentrated in Phase 1 area. Choose one or the other, if including Phases 2 and 3 then provide the details needed for a thorough, appropriate and proper assessment. 108-6

However, per the KCSWDM, "...New impervious surface means the addition of a hard or compacted surface like roofs, pavement, gravel, or dirt, or the addition of a more compacted surface, like paving over preexisting dirt or gravel..." [emphasis added], and Planning Area 1 currently contains little or no "paved" surfaces. Nearly all the existing impervious surfaces lie in Planning Areas 2 and 3. Therefore, all

proposed impervious surfaces in Planning Area 1 would be considered as "new impervious surface." See below that there are details "not known at this time" about Planning Areas 2 and 3. A greater percentage of impervious surface should trigger more requirements and protections to offset those impacts concentrated in this area (Phase 1) since a significant portion is being impacted by new impervious cover. Modeling native forest conditions is also required unlike it was during the upstream development of the ridge which has added flows to the river and possible increased flood risk below. I do not see cumulative impacts of this development accounted for in the DEIS. This needs to be rectified. 108-6

Groundwater contamination needs to be more fully addressed. The DEIS states that: *It is not anticipated that Planning Areas 2 and 3 will develop significantly outside of the existing impervious footprint of the site, but this is not known at this time.* This is additionally the rationale for considering this a Large Site Drainage Review. The EIS will also demonstrate that the total project site, albeit much greater than 50 Ac., *does not lie within* the recharge area of a sole source aquifer or *an area designated as highly susceptible to groundwater contamination."* I believe it does lie within a CARA, according to the Critical Aquifer Recharge Area (CARA) coverage in King County's online iMap. The mapped extent can be extrapolated to unmapped portions of the immediate adjacent area to see that it likely extends to this site in city limit. It shows a critical aquifer recharge area as Category 1, which requires high level of protective measures. Just because the City was not a participant or has not mapped this area does not make it less critical. 108-4

Regarding drainage planning, what about discharges to the river? Since there are few if any natural onsite features as claimed, will this facilities construction be done at all? Does application stop at new pollution generating surfaces? Is the current condition of drainage operating as per specification and needs of the site now? There are reports of a ditch / stream conveying contaminated discharge directly into the Snoqualmie River under Mill Pond Road and this drainage should be investigated and accounted for in the EIS. It seems that a stream flow/rainfall gauging and stream cross section monitoring plan is needed that will document any changes in the levels of flooding, erosion, and sedimentation, and identify responsible parties for necessary mitigation. Could this extend past sites draining to natural upland streams for protection against bank erosion and/or downstream flooding? 108-7

Water Supply Considerations

The WSP cites both a 2032 projection and a buildout projection. The 2032 projection specifically *excludes projected demand from both the Mill Planning Area and the Snoqualmie Hills West area*. The additional growth assumed to reach the buildout scenario anticipates approximately 945 residential dwelling units and 190 acres of commercial development resulting in approximately 1,300 new employees, beyond what is included in the 2032 plan projections. 108-8

From the table on page 2-17 of the DEIS looks like 2032 water demand is greater than what is available for treatment capacity, instantaneous water right, etc. and this doesn't include this proposed development. The City proposes to bring back decommissioned wells and develop claim sources. What is the guarantee that this can occur without hindrance to existing water rights given streamflow requirements and current planning with the State and that cone of depression areas will not include contaminated groundwater from the adjacent upgradient sites such as from Borst Lake area? This development should be curtailed or rescaled unless the water rights situation and hydraulic connectivity can be assessed to provide these assurances for future water availability. North Bend is already

encountering issues with water supply and this potential risk to supply and instream flows should be considered as part of this shared watershed and subbasin.

The Mill Pond Phase 1 may be able to be supported in future plans for water supply, but this is not guaranteed, particularly with increased demand for wine production on an annual basis. Add in uncertainty in rainfall and subsequent low and critical instream flows with potential for more restrictive measures in the future, and this puts the development and levels of service in the City of Snoqualmie at risk. Phases 2 and 3 have even less certainty in terms of water availability to support this build out. Therefore, Phases 2 and 3 should not be part of the consideration for this planned development nor should these two areas be included in the Phase 1 impacts until full plans and mitigation for water supply is in place. 108-8

Will the developer bear these costs to increase transportation and water infrastructure or will the revenues be enough to support these required upgrades and system additions over time even during economic downturns? If the latter, who will pay during off years during revenue reductions?

Water quality remains a concern not only from the potential to contaminate the river and water wells through groundwater connectivity with existing contamination on adjacent sites that may be conveyed post-excavation activities, but through wine manufacturing processes. Winery production generates wastewater with uniquely high concentrations of Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS). Wastewater treatment facilities upgrades will be needed before water can be conveyed to the temperature challenged river that also is being actively restored through investments by tribes, the County and numerous stakeholders to recover salmon and orca populations in the region. Who will bear the costs? Will the costs to upgrade the WWTP and supporting facilities be borne by city taxpayers who will inevitably see rates and water bills increase? 108-9

Other questions I have regarding water and water quality include:

1. How will instream flows, and water temperature of the receiving water bodies be impacted with these activities?
2. How effective will siting and operation of stormwater management facilities be in the 100-year floodplain if there is a flood event? 108-10
3. Who will pay for preventative measures to prevent the Snoqualmie River from migrating into the development area and associated critical infrastructure such as the footprint of the new road?

An overarching concern is the approach taken to determine impacts of this development. The review is not considerate of downstream impacts, and only holds to examine impacts on immediate and adjacent land properties. For example, when the Snoqualmie Ridge area was built, requirements for modeling flows did not adequately address storm series conditions. In other words, stormwater management facilities adhered to standards of the 1990s, and were not designed and built to handle consecutive storm events. This proposed Mill Pond development will compound the effects of those added flows that originate from upland impervious surfaces. This situation presents a risk to downstream communities and increases the potential need for costly levee and revetment facilities. Will the County taxpayers (and yes, residents of Snoqualmie in turn) and downstream communities bear these costs? Further, are hydroclimatic uncertainties such as atmospheric river events that cause extreme flows addressed adequately? The hydrological impacts of this proposed development need to be considered 108-11

in its full context, including direct discharge to the Snoqualmie River and how this increase in flow would work in tandem with existing development within the watershed. 108-11

Given the short timeline, I have highlighted fundamental concerns I have about this proposed development in my city. I believe the City is not providing adequate public participation opportunity to observe plans with interactive presentation of the facts in a public setting or through a virtual meeting or otherwise. This proposed Mill Pond development would have critical and far reaching effects and negative impacts on our community and ecosystems. Build out at this site poses a great risk to the health of our water, land and air. I urge the City to provide adequate consultation and meaningful public participation opportunities when community impacts are certain under developments proposed in the future. 108-12

Sincerely,

DLDi Santo

Denise Di Santo

Snoqualmie, WA 98065

Letter No. 109

Mark Hofman

From: jeff glaser <fishlip999@gmail.com>
Sent: Friday, July 10, 2020 5:24 PM
To: Mark Hofman
Subject: Snoqualmie Mill Plan
Attachments: DN Traffic Consultants report (1).pdf

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

To: Mark Hofman, Community Development Director, City of Snoqualmie

From: Jeff Glaser and Claire Nold-Glaser

Date: July 10, 2020

Re: Snoqualmie Mill Plan

We are writing to express concern regarding the proposed development at the Snoqualmie Mill site. We are newer members of the Snoqualmie Community Action Network and have lived in Fall City since 1994.

We are nowhere near expert in the understanding of the multiple serious issues related to this development, but perhaps that makes our understanding of the problematic nature of this development even clearer. It doesn't take an advanced degree to understand the negative effect of any phase of this development.

The primary reading and studying that we've done includes the DEIS, the developer's website: Snoqualmiemill.com, the Snoqualmie Mill Planned Commercial/Industrial Application and the DN Traffic Consultants Review of the Mill Property, see attached.

The DN Traffic Consultants Review should cause anyone who travels on the relevant roads and bridges cited to have grave concern about the future of these passages. These findings also clearly indicate the lack of substantial research done by Snoqualmie Mill Ventures LLC. Specific issues of concern include:

- The DEIS failed to address the impact of project generated traffic on Snoqualmie Valley Bridges particularly the Railroad Avenue Bridge and the Meadowbrook Bridge.
- The study of the Railroad Bridge showed failure of the bridge supports. An updated study of the bridge should be performed to determine current condition and what needs to be done to ensure safety of the bridge.
- The DEIS erroneously analyzed the Meadowbrook Bridge as a two-lane signal-controlled intersection. The bridge is in fact a single lane bridge and requires a special approach to the analysis which considers the capacity constraints of the bridge.
- The DEIS fails to completely identify, analyze, and mitigate the impacts of construction activity on the study area roadways and intersections.

Our property in Fall City abuts the Fall City-Redmond Road, so this point is especially concerning to us:

- The DEIS fails to discuss the potential for traffic diversion through the valley. Currently, congestion at the at I-90/SR 18 forces traffic to divert to other routes for access to I-90 including Exit 22 – Preston/Fall City, Exit 27 – Snoqualmie/North Bend and Exit 31 in North Bend. The analysis should identify the potential for traffic to divert to alternative routes.

Over the years we have lived in our home, there has been a marked increase in traffic volume, related noise pollution and car crashes on Highway 202.

In the conclusion of the DN Traffic Consultant's report, the following points are made:

- The DEIS for the Snoqualmie Mill Site PCI proposal **fails to adequately address** the traffic and transportation related impacts of the proposed Snoqualmie Mill Site PCI project. In general, the DEIS highlights many of the issues, but **fails to do the in-depth analysis** necessary to understand the impact of the proposed action. The DEIS analysis has attempted to apply national data to analyze the conditions when local data is available and would better represent the Snoqualmie Mill Site project and the environment in which it is placed. **The DEIS should be redone** to provide a significant and in-depth analysis of the project traffic impacts.
- The study failed to sufficiently address the traffic related issues associated with the anticipated construction. The impact of construction traffic is significant on roadway capacity and the impact on pavement. **These conditions should be known and understood as part of the DEIS process. The Applicant should be encumbered with the cost** of improving the pavement after construction. The cost could range from resurfacing through an overlay or complete reconstruction of the road if the pavement fails.
- The project should not be allowed to proceed **until funding is secured for all improvements necessary** to provide an acceptable level of service. If public funds are not available, the Snoqualmie Mill Site project should provide a bond for the cost to construct these improvements.

109-1

It is abundantly clear to us that the haste Snoqualmie Mill Ventures LLC has exhibited runs contrary to the statement on their website that includes, "Thoughtful design standards uphold the vision and heritage of the property and surrounding valley. By respecting the spectacular natural surroundings and encouraging green building practices, Snoqualmie Mill represents a perfect opportunity for the right business development and commercial space."

109-2

We do not support any phase or plan of the proposal put forth by Snoqualmie Mill Ventures LLC.

Letter No. 110

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Sandra Tevis <sandra.tevis@gmail.com>
Sent: Friday, July 10, 2020 9:24 PM
To: Mark Hofman
Subject: Snoqualmie Mill Plan

Categories: Green category

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Mark Hofman
Official
Snoqualmie
987
98065

SEPA Responsible
City of
PO Box
Snoqualmie, WA

Dear Mr. Hofman,

110-1

I am a long-time Snoqualmie Valley resident - I have lived here 33 years and am truly thankful to call this valley my home. I am writing this letter to offer my opinion regarding the Snoqualmie Mill Plan - thank you for listening.

I could perhaps tolerate the addition of a couple of wineries and side-businesses that support wine production and tasting, however I absolutely do not support the addition of an amphitheater whatsoever/whenever. Incidental concert sound is not conducive to the beauty of Snoqualmie Falls and is immeasurably disrespectful of the falls, as well as the neighborhoods within earshot. Please, please remove the plan for this venue. Aside from the unwelcome concert sound, the added traffic caused by the concert venue would overwhelm the area. Please do not invite this major influx of traffic into our valley. Finally, we all know there are concerns regarding environmental, pollutant, and flooding factors that would impact the area.

110-2

Again, thank you for listening and please consider my concerns.

Sincerely,

Sandra Larson Tevis
S
98045

223 Taylor Ave
North Bend, WA
425-890-4660

Letter No. 111

Mark Hofman

From: Elaine Armstrong <elaine.arm39@gmail.com>
Sent: Friday, July 10, 2020 10:16 PM
To: Mark Hofman
Subject: Response to DEIS for Mill Site
Attachments: DEIS concerns.pdf

Categories: Green category

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JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Please find attached my comments on the DEIS for the Mill Site.

Elaine Armstrong
(360) 921-2329

ciò che è diverso provoca disagio. Cerca il diverso.
All that is different causes discomfort. Seek different.

I am Elaine Armstrong, resident of Snoqualmie, (7726 Fairway Ave SE. #502, Snoqualmie, WA 98065). I am a member of Citizens' Climate Lobby and People for Climate Action. Both of these organizations have a strong interest in swift and effective action to stop and reverse climate change. I feel very fortunate to live in a city that has entered into the King County-Cities Climate Collaboration and want to do anything that will help Snoqualmie meet the goals they agreed to.

I am also a member of Snoqualmie Community Action Network (SCAN) which has a powerful interest in assuring the health and happiness of residents of our beautiful city. I have grave concerns about the Snoqualmie Mill Ventures plan to develop the brownfield site so close to waterways populated with fragile plants and animals. We humans, too, will be adversely affected by the unaddressed toxins this site contains. Thank you for reading my concerns.

Response of concerns and questions on the Draft Environmental Impact Statement related to the Mill Site.

1. Reference pages 1 and 2:
   a) The preferred alternative plan indicates it will create 3,400 jobs and 160 units of multi-family housing. This housing, and any housing in Snoqualmie, will not be affordable to the warehouse and light industry workers, causing as many as 3,400 passenger vehicles in and out of our city, in addition to the heavy truck traffic required by the light industry. 111-1
   b) I need specific details of what the estimated $7.4M and eventual $32.3M net economic benefit for the community of Snoqualmie will entail. This economic benefit also needs to be balanced against the increased cost for road repair and the replacement of the Snoqualmie bridge that Snoqualmie residents will likely have to pay due to this development. 111-2
   c) What is the specific plan for cleaning up the Brownfield site for plan areas 2 and 3. This is the only EIS we will be getting for this development and I think specifics about the extent and ways this cleanup will happen is crucial for us in the community. 111-3
2. Reference page 1 - 4
   a) Apartments will be for rent at market rates. There is no way that market rates will be affordable to warehouse and restaurant workforce members. 111-4
3. Reference page 1-12
   a) You can no longer assume future CO concentrations will decline due to efficient vehicle and clean fuel regulations, which have been severely modified as of 3/31/20 by the current US President.
   b) The DEIS is inaccurate in it's assumption that CO concentrations will be the same or at maximum 0.1 ppm higher than the no action alternative because traffic volumes will increase and as yet, there is no effective action to reduce CO by either state or federal agencies. A new estimate has to be made here. 111-5
4. Reference page 1-13
   a) You can no longer state that CO levels will come down for the alternative plan despite an increase in traffic volumes with the assumption of more efficient

vehicles and cleaner fuel regulations. These regulations have changed significantly and no longer apply. 111-5

5. Reference page 1-14
   a) "The likely use of the green building technologies" There is no assurance that green building technologies will be used or required of future developers by SMV. It is disingenuous to imply this has any chance of actually happening. 111-6

6. Reference pages 1-14 and 1-15
   a) There should be direct measurements of contamination rather than only relying on previous reports. Clearly, in such an area exposed to high amounts of precipitation and flooding, pollution does not sit in one place. Historical reports cannot do justice to what is actually occurring on this site now. To be a truly useful environmental impact statement, there needs to be direct, physical measurements especially of planning area 1 which is assumed to have little toxic contaminants due to being only a log storage site. I cannot emphasize too strongly how much the community of Snoqualmie need and deserve an accurate and current analysis and subsequent detailing of how exactly any findings will be mitigated. 111-7

7. Reference page 1-25
   a) It is important to mention an increase in traffic from 3,400 new employees who will not be able to live at the Mill Site because those housing units will be rented for market value. It is clear that employees in warehouses or wait staff in wine tasting venues will not earn enough to be able to afford to live on the Mill Site nor in any part of Snoqualmie City. 111-8

8. Reference pages 1-26, 1 - 27
   a) Light and glare from night time activities have not been addressed. With the alternative proposal, the 5,000 sea amphitheater w'll cause significant night sky glare and light pollution. Where will this be addressed? 111-9

9. Reference page 1 - 36
   a) Noise from the amphitheater wi l be heard all over Snoqualmie City and nearby neighborhoods. What assurance do we have that the City will not grant noise variances on a regular basis for concerts and other events. t is importa ı to the residents of the city hat a fair , hone t and true assessment of these likely impacts are made clear in this document. 111-10

10. Reference page 3-3
    a) I need to know how old the tudies are hat are relied on in this section. Soils do not stay in the same place, most certainly true with the rain profile we have had over decades in this area. 111-11

11. Reference page 3-8
    a) Please explain where and to what dep h fill has been added to this area over the last 2 or 3 years in prepara ion f r this i e for development. 111-12

12. Reference page 3-12
    a) I andslide Steep Slope Hazard Zone 2 contains some areas that fi the definition of steep slope hazard as de ined in the City code. Please give concrete assurances in this document that hose areas will **never** be developed. 111-13

13. Reference page 3 - 22
    a) Please give me assurances that a eo echnical engineer will analyze the development site once de ailed and specific proposals are made. 111-14

14. Reference page 3-23
    a) Please give me assurances that deep foundation or deep ground improvement will occur before new structures are built.
    b) Also I need assurances that a TESC plan will be established during the design phase, a geotechnical engineer reviewing the grading, erosion and drainage plans and an erosion control inspector on site during construction.
    c) I need assurance that earthwork activity will be in non-winter months and exposed subgrades hydroseeded well before September.

111-15

15. Reference page 3 - 26
    a) Again, it is important that future structures ARE supported on deep foundation systems or use ground improvement techniques to mitigate settlement risks due to lateral spreading. The phrase "likely" that these measures will be used is not sufficient assurance!
16. Reference page 3 - 31 to page 3 - 33.
    a) There is in fact Green House Gas (GHG) reduction targets which are applicable to this project. The City of Snoqualmie has entered into an agreement with K4C (King County-Cities Climate Collaboration) to reduce Green House Gasses by 25% by this year, 50% by 2030 and 80% by 2050. We are woefully behind in meeting these goals which should be considered for this Mill Site Project.
    b) It makes no sense to only analyze GHG created on the Mill Site Project by the direct burning of fossil fuels alone, when this project will create between 3,000 and 5,000 additional vehicles entering and leaving our city every day.

111-16

    c) Please include the analysis of these additional car trips, WITHOUT the assumption that higher mpg (miles per gallon) or more fuel efficiency regulations will have any impact, on release of GHG since these regulations have been systematically and dramatically reduced by the federal government.
17. Reference page 3- 35
    a) To gauge GHG impacts, CO2 needs to be evaluated as well as CO emissions from increased traffic.
18. Reference pages 3 - 36 to 3-38
    a) What months of 2018 were baseline data taken? The first few months of 2018 were the snowiest of recent memory and therefore baseline traffic would be at its absolute lowest possible. I request that summer months be used, once the COVID-19 pandemic restrictions have passed, to get the real traffic emission data for an accurate comparison.
    b) Adding over 13,000 vehicles per day (which may be a conservative estimate since workers cannot possibly afford the market rates apartments built in this area will command) or more, if the alternative plan is approved with a fully operational amphitheater, MUST increase the LOS levels all along Snoqualmie Parkway. These estimates of LOS under the completion of planning area 1 as well as the full build out. Please explain how over 13,000 vehicles, in a city of only 14,000 residents, will make almost no impact.

111-17

    c) Since light industry will be part of the PCI, and already heavy trucks make *hundreds* of trips per day up and down Snoqualmie Parkway, it is insufficient to say traffic for light industry will be minimal. Surely it will add hundreds more trips of additional heavy vehicles into and out of our area. Please reassess this!

d) It can no longer be assumed that impact will decrease with adoption of newer, more efficient vehicles and cleaner fuel regulations as these have all been gutted. Please reevaluate!

19. Reference pages 3 - 39 to 3 - 42
    a) In neither exhibit 3.2-4 or exhibit 3.2-5 is increased transportation considered. Increase in traffic will be caused by many workers being forced to commute into and out of Snoqualmie since they will not be able to afford the apartments on the Mill Site that will be rented for market rates. Traffic emissions in this section on Air Quality and GHG have not specifically measured or estimated the most abundant GHG, CO2. 111-17
    b) To say that the impact of this one project is negligible on either statewide or global GHG emissions is deeply problematic. Obviously, if every project on Earth made the same claim, nothing would be done to mitigate against Climate Change. In addition to claim that there will "likely" be use of green building technologies is highly disingenuous, since there is no mention of any assurance this will be the case for developers who will build this project as it unfolds.
    c) Analysis of the Plan Alternative does not include the vital data from 5,000 vehicles to and from the amphitheater for an unknown number of concerts and events. (That's 10,000 possible trips *each day* there is an event). Please include this source of GHG emissions.
20. Reference page 3- 135
    a) None of the sources for the environmental section used current and local investigation and testing of the site. It seems very inappropriate to assume that historical analyses would still be accurate, given the extensive yearly rainfall in this area. Where exactly the toxins are now in this serious brownfield site must be known before people are exposed to work, live and recreate in this area! 111-18
21. Reference page 3 - 141
    a) The description so ar makes it seem like there is little left to clean up. However, this is considered a brownfield site and poses a significant risk to the health of anyone who walks, lives, works or visits.
22. Reference page 3 - 142
    a) I think it is critical that the brownfield site be cleaned up before businesses, residents and workers use this site. Although there seems to be little evidence of contamination in planning area 1, the City of Snoqualmie should require a robust effort to clean up the contamination in the rest of the planning areas before planning area 1 is allowed to start their construction. Is it required? Perhaps that answer is no. However i is unconscionable to expose people to a brownfield level of contamination in close proximity without cleaning up the entire site. This document has stated in more than one place that one advantage of allowing SMV to develop the Mill Site is the cleanup of the brownfield areas. Would you allow your children to play live or frequent in close proximity to these toxins? 111-19
23. Please read this independent environmental review by Melissa S. Leone, LG

I have reviewed the draft environmental impact statement for the Snoqualmie Mill proposed construction project These are draft comments based on my limited time reviewing documents.

I understand the site has a history of lumber mill activities operating from approximately 1916 to 1989. During historical site use there were releases of several contaminants of concern to soil and groundwater. These contaminants of concern (COCs) include petroleum hydrocarbons (including gasoline and diesel) and related compounds including benzene, toluene, ethylbenzene, and xylenes, from USTs/ASTs, PAHs and metals from boiler ash used as fill, PCBs from electrical transformers, and chlorinated phenolic compounds (Including PCP) for treating wood.

Between 1989 and 2006 several environmental consulting firms conducted environmental remedial activities primarily via excavation and bioremediation. During these remedial activities many of the COCs were reduced to levels below relevant MTCA cleanup levels, however there are COCs remaining at concentrations exceeding MTCA standards in some areas. There remains concentrations of COCs in soil and groundwater in areas across the site that will need to be addressed during phase 2 and phase 3 construction on site, particularly the PCBs in a perched groundwater zone above a clay layer aquitard. Also during phase 1 of construction if there is any proposed deep foundation work and or dewatering at the site it would be prudent for the earthwork contractor to have a licensed hydrologist involved to ensure no groundwater contamination migrates from Phase 2 or 3 into phase 1, and/or the clay layer aquitard is not breached. The contaminated areas of the site mainly are in phase 3 of the proposed construction area, which was primarily where the lumber mill foot print was located. Phase 1 does not appear to be in the area of concern of legacy chemicals that remain following historical remedial activities, however more characterization of the site would be helpful to delineate the boundary. 111-19

These recommendations are based on limited review of site documents.

Thank you,
Melissa S. Leone, LG

22. Reference page 3 - 221
    d) The curved path of exhibit 3.9-18 could not possibly be from the bridge, which is straight. 111-20
23. Reference page 3 - 224
    e) Mitigation of the effects of the amphitheater need to include protection of a dark night sky. 111-21
24. Reference Page 3 - 140
    a) What levels of lead were found in ground water in planning sites 2 and 3? Why are these considered background levels or due to turbidity? Earlier petroleum products used lead for decades until it was regulated. There is good reason to assume this may be a serious lead contamination. 111-22
25. Reference page 3 - 254

a) The majority of data taken for baseline trips by All Traffic Data were taken in February of 2018, the snowiest (and therefore least traveled) days in recent memory. In addition, all but one measurement (at SE Meadowbrook Way and 202) were taken in either February of 2018 or January of 2020. These winter months would show far less traffic than we can expect for the peak of much of the activity at the PCI and therefore not a valid baseline. 111-23

26. Reference page 3 - 261
    a) Please cite exactly what services, and frequency Metro Connects actually plans for Snoqualmie and when we might expect to enjoy these services. Because we have already overbuilt our MAXIMUM (The City Administration insists on calling these minimums, which is inaccurate and contrary to the spirit of this plan) growth according to the Growth management Act, we already suffer from a grave lack of frequent and efficient public transportation here. King County was reluctant to approve the City of Snoqualmie's current comprehensive plan, in part because we had overgrown the County's ability to provide public transit. In fact, Snoqualmie has LOST bus service, notably an express directly into Seattle, in recent years. Please let us know what specific public transportation services, their frequency and when they will be able to be used as part of this analysis. 111-24
    b) Please cite the frequency of Route 208 and Route 628 bus services. These are not adequate public transportation options as they run with often ninety minutes between buses.
27. Reference page 3 - 281
    a) With more than 3,000 jobs created by Plan Area 1, and the estimate that there will be 5,768 new daily passenger vehicles trips, it makes no sense that only 336 of these trips will happen during AM peak hour and only 438 during PM peak hour. It's very clear that most of these workers will have to come from outside of the PCI and more likely outside of Snoqualmie, creating traffic all along the Snoqualmie Parkway as well as 202. The estimates in exhibit 3.11.14 appear very inaccurate. Please explain how the AM and PM peak hour trips were figured. 111-25
28. Reference page 3 -286
    b) Again for the estimates on new trips generated, it seems highly unlikely that 13,144 new passenger vehicle trips will only add 1,171 AM peak hour trips and only 1,421 PM peak hour trips. Please explain how these estimates were figured.
29. Reference page 3 - 297
    c) Payment for a regular signal was made by a previous developer related to the Fisher Avenue SE and Snoqualmie Parkway intersection (intersection #10). The City Administration refused to put in the full signal in a timely manner and apparently has no good accounting for where that money went. To claim that yet another development must be approved (Snoqualmie Hill West) to finally get the families on either side of the Fisher Ave SE and Snoqualmie Parkway the safety of a full signal is at the very least disingenuous and coercive and at worst, holding hostage the safety of children and their families. 111-26
30. Reference page 3 - 304
    a) To estimate only 2,000 to 3,000 vehicle trips for each event at a 5,000 seat amphitheater seems like an underestimation. In addition, to make money it could 111-27

very likely be the case that events will be held at the amphitheater attracting many thousands of cars several days a week in the warmer months.

31. Please refer to this report paid for by Snoqualmie Community Action Network, independent of the City of Snoqualmie for my additional concerns on transportation: https://drive.google.com/file/d/1aakDGSZOKMeeooCglVN26yPdAo8rB3fr/view 111-27

32. Please refer to this report paid for by Snoqualmie Community Action Network regarding the impact on wetlands and water: https://drive.google.com/file/d/1dMT1Mim75tntlq104H4t7CXJePH0NB7x/view

33. I hereby include, by reference:

- The letter from King County Permitting Division, Department of Local Services to Mark Hofman, submitted 7/10/2020 (but erroneously dated 7/13/2020 in the body of the letter)
- The letter from King County Department of Natural Resources and Parks, Historic Preservation Program to Mark Hofman, dated 7/9/2020 111-28
- Expert consultant's reports submitted by SCAN to Mark Hofman on 7/10/2020:

DN Traffic Consultants report dated 7/3/2020
Cooke Scientific report dated 7/9/2020
Practical Environmental Solutions report dated 7/10/2020

- The letter from Bricklin & Newman LLP to Mark Hofman on behalf of SCAN dated 7/10/2020

Thank you for your attention in this matter
Elaine Armstrong
360 921-2329

Letter No. 112

Mark Hofman

From: Karen Meador <karmeador@comcast.net>
Sent: Friday, July 10, 2020 10:18 PM
To: Mark Hofman
Subject: Snoqualmie Mill Property DEIS
Attachments: Sno Mill LOS.pdf

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mr. Hofman,

Please find my letter regarding the Snoqualmie Mill Property attached.

If you have any questions, please feel free to contact me.

Thank you very much for your consideration.

Best regards,

Karen Meador
karmeador@comcast.net
253-833-9084

KAREN MEADOR
Historian
&Author

July 10, 2020

Mr. Mark Hofman
Community Development Director
City of Snoqualmie

Re: Snoqualmie Mill Property – DEIS

Dr. Mr. Hofman,

I am writing in support of utilization of the Snoqualmie Mill Property as a heritage site. As a major lumber mill that continued operations for over seven decades, it represents a microcosm of significant portions of Western Washington history.

This is a unique property for a number of reasons. The fact that Japanese Americans, recruited by Weyerhaeuser from Japan, were employed at the mill from its opening in 1917 through the World War II internment is of additional significance. The artifacts found from that era add to the interest in the site and those who lived there for 25 years. 112-1

Seattle's Georgetown Steam Plant Museum is a popular tourist destination, drawing many visitors who contribute to the local economy. The Snoqualmie Mill property has the potential to reach similar approbation.

A heritage site/museum at the Mill property would be of benefit to the City of Snoqualmie, its' residents and a tribute to Greater Snoqualmie and its heritage.

Thank you very much for your consideration.

Very truly yours,

Karen Meador
Historian
karmeador@comcast.net

Letter No. 113

Mark Hofman

From: dana.hubanks <dana.hubanks@gmail.com>

Sent: Friday, July 10, 2020 10:39 PM
To: Mark Hofman; Shared Mill Site EIS
Cc: Bob Sterbank
Subject: comments re: DEIS of Snoqualmie Mill PCIP
Attachments: Personal Mill Site DEIS public comment.docx

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JUL 10 2020
City of Snoqualmie
Community Development Department

Categories: Green category

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Mr. Hofman,

Attached you will find my personal comments regarding the DEIS for the proposed Snoqualmie Mill PCIP.

Please include this in the official record.

I will look for your response confirming that you have received this email.

By my watch, it is 10:38pm on Friday, July 10th, 2020.

Thank you,
Dana Hubanks

July 10th, 2020

City of Snoqualmie
Community Development Department
ATTN: Mark Hofman, Community Development Director

Re: DEIS for Snoqualmie Mill PCIP proposal

Mr. Hofman,

I am writing today as a private citizen in response to the draft environmental impact statement for the proposed commercial/industrial project at the historic Snoqualmie Mill property.

1. **Failure to notify as per previous agreement**

The first issue I'd like to draw attention to is a personal one. In the summer of 2019, I was threatened with a lawsuit by the attorneys representing the applicant developers for requesting, via public records request and *under the direct recommendation of you,* Mr. Hofman, the documents associated with this DEIS. After a brief back and forth with city attorney Bob Sterbank and the applicants' private attorneys, which thankfully resulted in my avoidance of a legal battle, I was asked to withdraw my public records request *under the pretense that I would be added to a list of interested parties to be alerted of the release of the DEIS once it became available for review.* Mr. Sterbank can refer to this exchange via his own email history. I agreed to these terms and withdrew my request. When the DEIS was finalized and made available for review, **I was not notified** and was not included on the list of interested parties. I have also been made aware that the Japanese American Citizens League (JACL) and the Japanese Cultural Community Center of Washington (JCCCW), two organizations who expressed vested interest and concern in the future of the mill property in 2017, who have sent representatives to meet personally with both the city and the developers, and who even went so far as to issue an emergency resolution to the city that same year, were not notified of the release of the DEIS either. This strikes me as a severely problematic misstep. Due to these failures of notification, and in light of existing requests from numerous citizens and citizen groups (including, full transparency, my own organization) for a pause in this process (due to various reasons including the pandemic, pending records requests, etc.), I would also like to formally assert that it is my distinct opinion that this process should be paused. This hold should continue until all interested and involved parties are given ample and appropriate time to respond adequately and until our state and local governments are able to fully reopen after the pandemic subsides.

113-1

Regarding the covid-19 pandemic, the City's decision to release this important and mammoth document at a time when interested parties are unable to visit agency offices to review records (many of which are not available in digital formats), rely on expedient contact with agency personnel or, most importantly, come together in person at City Hall to review and discuss this document, is irresponsible, inconsiderate, and tone deaf. Governor Inslee has advised city governments to limit their activities to necessary day-to-day business until our communities are able to reopen to the point of functionality. It is my distinct feeling that the City of Snoqualmie blatantly ignored all reason and consideration here in order to push this process forward. 113-1

2. Failure to sufficiently discuss contamination, remediation

In the cover letter of the DEIS, the author refers to "more than a decade of cleanup activities" that have taken place on the mill property. This claim is misleading. While a few remediation activities have taken place on the site in an attempt to remove contaminated soils, these activities have been shown to have been far from comprehensive or effective and have certainly not amounted to a decade's worth of cleanup activities, though they may have taken place individually over the course of a decade.

On July 28th, 2015, applicant developer Tom Stroufe of Brookwater Advisors and Snoqualmie Mill Ventures LLC. submitted a Construction Stormwater General Permit application to the Department of Ecology. On this legal form, which he signed at the bottom, he claimed to be "unaware of contaminated soils present on the site." Further, at the initial presentation of this proposed project, hosted at City Hall in 2017, developer Tom Stroufe stated on record that the contaminants on the site (which he had apparently since become aware of) had been "cleaned up." All of this, of course, is wildly false. I'm concerned that these continued claims and insinuations--by both Mr. Stroufe and the reviewers he hired--that the site has been extensively remediated downplays the issue of toxins present at the site and reveals a dearth of seriousness and responsibility on the part of both the developers and the reviewers. 113-2

I will additionally point out that toxicologist Pam Jenkins, retained by my organization, Snoqualmie Community Action Network, refers on page 6, section 16 of her DEIS response letter to the insufficiency of some of the remediation techniques used to address contaminated soils on the mill property. As Pam points out, soils containing levels of contamination above Method A soil cleanup levels, despite attempts at remediation, were reburied on site. SCAN would like to reiterate Pam's assertion that these types of "cleanup" activities should be avoided.

According to a review prepared by Associated Earth Sciences Inc. in 2015, there is a particular zone, designated as the T-12 area, in the south western portion of the property, just north of Borst

Lake, which has been recommended for indefinite isolation from any future development. In early versions of maps drawn up for the proposed development, and displayed at the scoping meeting at City Hall in the spring of 2017, a road was shown crossing directly through this area. The DEIS fails to properly contend with how this highly problematic area would be dealt with in the context of a large, bustling commercial/industrial atmosphere, how it would be handled during construction, how and if it would or could be properly remediated (as it seemingly would need to be handled differently than others areas on the property), etc. Any future DEIS or EIS should deal explicitly and seriously with the severity of contamination at the T-12 site. 113-2

3. **Failure to discuss potential impacts in detail**

The primary concern I have with the DEIS as a whole is its commitment to vagueness. For such a complicated property and extensive potential project, the reviewers and, by extension, the developers, owe as much detail to community members and council representatives as possible in order to enable informed and responsible decisions. In Appendix C: Wetlands, Wildlife, and Fisheries, Raedeke refers beautifully and extensively to the massive amounts of "open space" to be left by the proposed development; however, it does not discuss the often detrimental effect that planned developments have on buffer zones and zoned wetlands, especially when existing in direct proximity to one another. I am specifically referring to the important differences between natural wetland zones and habitats as opposed to designated wetlands that are surrounded on all sides by construction, commerce, and impermeable surfaces. Neither does the DEIS speak in nearly as great detail about the intricacies of the development itself and the effects these apparently unknown characteristics could have on wetlands, wildlife and fisheries. The report seems to attempt to comfort us with grand promises about open space while glossing over the true intention of the report, which is to explain how the development itself could impact these open spaces and the surrounding environment. 113-3

On page 33 of the Raedeke report, the author claims that "the intensity of the proposed development...is relatively low compared to many planned industrial sites." What is the author's basis for making this claim? To what specific planned industrial sites is this proposal being compared? Regardless, this comparison feels irrelevant. The author should not be comparing the intensity of this project to other unnamed planned industrial sites in other places; rather, they should be comparing it to the intensity of other projects in the locale and community where it is based. How does the "intensity" of this project compare to existing developments in downtown Snoqualmie? How does the "intensity" of this project compare to other projects whose impacts we have already been able to observe in our community? Making baseless comparative claims about this proposal is not only unhelpful, but it reveals a certain degree of bias on the part of the reviewer and should be struck from any future draft of the EIS.

4. **Lack of consideration of historical, cultural and contemporary uses of the site** 113-4

In Appendix C, Raedeke's report also claims that the historic mill town (occupied by mill workers) existed off site; however, we have extensive documentation of the fact that Japanese mill workers and their families, including children, lived on site in the central northern portion of the property. Although this detail does not necessarily impact Raedeke's assessment of wetlands, wildlife or fisheries, it is an important historical and cultural detail to note. This property was not solely an industrial property; it was also a residential property until WWII when these Japanese families were inhumanely evacuated, detained and interned. The DEIS as a whole should reflect awareness of this critical history. 113-4

Similarly, in Raedeke's discussion of the site's current uses, they make no mention of its yearly use as a large temporary parking lot for the Boeing Classic golf tournament (with the exception, presumably, of this year in light of the pandemic). I'm concerned by the incomplete picture the reviewer offers of the historical and contemporary realities and uses of this property.

5. Incomplete discussion of river health

In the river health portion of Raedeke's report, they claim that all forks of the Snoqualmie River are "high quality" and of "low concern." However, much like the rest of the report, they don't get into detail here and end up offering a very incomplete and misleading picture. What specific model are they using to determine water quality? To what factors of river health specifically are they referring? According to the Snoqualmie Watershed Water Quality Synthesis Report, published in 2009 by the King County Department of Natural Resources and Parks and prepared by Janne Kaje (link below), the temperature of all three forks of the Snoqualmie River are listed as a "basis for concern." Additionally, the south fork of the Snoqualmie River, which feeds into the mainstem just upstream from the mill property, is documented in the same report as having a temperature with a basis of concern, an impaired fecal coliform standard, a pH with a basis of concern, and nutrients with a basis of concern. This comprises four out of five of the review areas examined in the report. Again, Raedeke does not specify how they came to their determination of high water quality across the board for the Snoqualmie River. This glaring overgeneralization should be amended in any future version of the EIS, and inevitable effects that the proposed development would have on the extremely proximal mainstem of the Snoqualmie River should be taken into full account and explored in detail. Without a full analysis of the impact that this proposed development would have on the holistic health of the Snoqualmie River, which flows directly into critical commercial farmland at the immediate base of the Snoqualmie Falls and throughout the entire lower Snoqualmie Valley, this DEIS, and any future version that might also omit these considerations, are pointedly incomplete. 113-5

To view the Snoqualmie Watershed Water Quality Synthesis Report, please follow this link: https://www.govlink.org/watersheds/7/pdf/Snoqualmie_Water_Quality_Synthesis-150_COMPILED.pdf

6. Reliance on Draft Shoreline Master Program

Another significant issue I noticed in my review, referred to as well in the report assembled by Sarah Cooke with Cooke Scientific, is the reliance of the DEIS on an as yet unapproved *draft version* of the City's Shoreline Master Program. While the Snoqualmie City Council voted to approve the draft of the SMP in August of last year, the document requires final approval from the Department of Ecology which has not yet happened. Due to the current SMPs age, as well as the significant inadequacies of the draft SMP, as noted by both citizens and City of Snoqualmie planning commission members at a public hearing in 2017, it seems irresponsible to assemble a DEIS that relies on anything other than a fully up-to-date, fully approved version of the SMP. Any further steps taken in handling the proposed Snoqualmie Mill PCIP should wait for the approval of this final document. 113-6

Due to the immensity of the DEIS in combination with my limitations as a human being who occasionally requires food and rest, I have unfortunately been unable to read and respond to all aspects of this important document in the time allotted. As you will note elsewhere in the comments submitted by my organization, I echo the requests for a formal extension of the comment period and for a resubmittal of the DEIS to the public once a more serious document is compiled by the applicants and their reviewers. This request is further emphasized by my comments at the beginning of this letter regarding my lack of notification as a supposedly "interested party." 113-7

I will note here as well that although I write to you today as a private citizen, I am also a founding member of the Snoqualmie Community Action Network and that I, of course, fully support and echo all of the comments and recommendations submitted therein by our consultants and members.

Thank you for taking the time to consider these comments.

Sincerely,

Dana Hubanks

Attachment saved as
#17 SCAN

Letter No. 114

Mark Hofman

From: Lacy Tanneberg <ceeatelle@yahoo.com>
Sent: Friday, July 10, 2020 5:46 PM
To: Mark Hofman; Shared Mill Site EIS
Subject: DEIS Snoqualmie Mill

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

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Re: Snoqualmie Mill PCI Plan Draft EIS

10-July 2020

To Whom It May Concern,

I volunteered to help review the DEIS as a participating member of the SCAN group. Although I am not familiar with the City of Snoqualmie's development plans, I do have serious concerns about approving a third "city" location (in addition to old/downtown Snoqualmie and Snoqualmie Ridge).

I am also an active member of a Sustainability Project Team, specifically focusing on Green House Gas emissions, in addition to my "day" job with Cytiva and the lack of attention to focusing on a net zero impact to the environment including building materials is somewhat disappointing. It is beyond time for all of us, as professional employees and citizens of neighborhoods, to start requiring a much harder restriction on those decisions we are responsible for making. If Snoqualmie truly is a "green" city, I would expect to see much more mention of this within the DEIS. There needs to be much more attention paid by the City of Snoqualmie to address the presence and build plans for the PCB's present, the boiler ash, and potential PCP contamination. I do not see sufficient plans to thoroughly address those contaminants and avoid spreading.

I volunteered to help read this document because I am extremely concerned as a resident who is down-river from this site, in Fall City. Continued development next to vulnerable resources such as the Snoqualmie River is extremely concerning and the risk for permanent damage seems too risky to allow.

If this are is truly an existing hazard to the natural areas at the Mill site, it seems that the City of Snoqualmie should attempt to take some ownership in the clean-up of this area, instead of waiting for a developer to own the costs/project without major oversight. Especially considering I have doubts in the thoroughness that will be required of a clean-up that hasn't been scoped, to date, as I mention multiple times below.

The lack of mention of public transportation is concerning. There is no mention of access to this area other than by car, and no thought to bus lines or bike access. You are putting more cars on 202, Snoqualmie Ridge Parkway, and subsequently the I-90/Hwy 18 interchange. The location of this new development is tucked far away from opportunities for public transportation and it will be only the most fit human beings who will be able to access this "tourist" area by foot or bike.

I understand that the water permits haven't even been approved for this project, and the permit is only structured to support Phase 1 of this project. There is no mention to the water rights permit or how the developer will source water rights for the other two Phases of the project. This is extremely concerning.

I have provided my feedback (and the above verbiage) in the attached PDF for your review.

Thank you
Lacy Linney
Fall City

Letter No. 115

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

Mark Hofman

From: monica lowney <monicalowney14@yahoo.com>
Sent: Friday, July 10, 2020 11:02 PM
To: Mark Hofman; mhoffman@ci.snoqualmie.wa.us; Shared Mill Site EIS; mhofman@snoqualmie.gov
Subject: Fw: SCAN comments re: Snoqualmie Mill DEIS
Attachments: SCAN DEIS Comment Cover Letter.docx; A. Supplemental DEIS Comments.docx; B. Supplemental DEIS comments pt. 2.docx

Categories: Green category

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Sent by electronic mail on July 10th 2020 at 11:00pm

Subject: comments re: Snoqualmie Mill DEIS

July 10th, 2020

City of Snoqualmie
Attn. Mark Hofman-SEPA Representative
Snoqualmie, WA 98065

I wish to include by reference the attached letters as a part of my additional comments submitted under separate cover pertaining to the DEIS for the Snoqualmie Mill Site. Please review below and thank you for adding this to the public record for review.

The July 10th 2020 report issued by Pam Jenkins with Jenkins Environmental Specialist on behalf of SCAN to Mark Hofman.
The July 10th 2020 letter issued by Sarah Cooke from Cooke Scientific Services on behalf of SCAN to Mark Hofman..
The July 3rd 2020 traffic report prepared by Gary A Norris, PE. PTOE with DN Traffic Consultants on behalf of SCAN to Mark Hofman..
The July 10th 2020 letter prepared by Audrey Clungeon with the office of Attorney David Bricklin on behalf of SCAN to Mark Hoffman. SCAN Snoqualmie Community Action Network cover letter dated July 10th 2020 found below.
The July 9th letter issued by King County Department of Natural Resources prepared by Jenifer Meisner sent to Mark Hofman.
The July 10th 2020 King County Permitting Division letter prepared by Jim Chan Division Director (Accidentally dated July 13th 2020) summitted to City of Snoqualmie Mark Hofman.
I would also like to include letters of reference written and submitted by: Dick Scheel, Dana Hubanks, Cris Coffing, Julie Lake, Fuzzy Fletcher, Jim Simon, Elaine Armstrong, Aureyal Van Gemert, Ann Davidson. Wayne Russell.
Also three letters that were sent from the Department of Ecology pertaining to the DEIS. These three Departments include: The Toxics Clean up Program, The Water Quality Program and the Wetlands and Shorelands Program. Sarah Cooke refers to these letters in her report.

Attached you will find a collection of materials prepared by and for the Snoqualmie Community Action Network (SCAN) in response to the draft environmental impact statement for the proposed PCIP at the Snoqualmie Mill property. All of these materials should be included in the formal public record of comments to the DEIS.

1. Cover Letter (word doc)
2. Letter from David Bricklin, attorney (Google Drive attachment)
3. Letter from Gary Norris, traffic engineer (Google Drive attachment)
4. Letter from Pam Jenkins, toxicologist (Google Drive attachment)
5. Letter from Sarah Cooke, wetlands specialist (Google Drive attachment)
6. A. Supplemental DEIS Comments (word doc)
7. B. Supplemental DEIS Comments pt. 2 (word doc)

Please respond to this email as a receipt of delivery.

If your reviewers have any trouble accessing any of these documents, please alert me as soon as possible so that I can ensure that you are able to review them fully and properly.

Thank you,

Monica Lowney
Sierra Club Member
Snoqualmie Community Action Network Member


PES (Pam Jenkins) Comments - SnoqMillSite DEIS.pdf


Bricklin & Newman to Hofman - DEIS Comment Lett...


Cooke, Sarah - Snoqualmie Mill comments.pdf


DN Traffic Consultants report.pdf

Letter No. 116

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: H Wentink <hj4344@hotmail.com>
Sent: Friday, July 10, 2020 10:22 PM
To: Shared Mill Site EIS; Mark Hofman
Subject: I oppose the planned commercial development at the Snoqualmie Mill

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Greetings –
While I am not a Snoqualmie resident, I am your neighbor in Fall City, just off of Fish Hatchery Road and close to our beautiful Snoqualmie River. My family moved to the valley in 1978 and I had the opportunity to move back to this wonderful area in 2004. I oppose this project at this time for the following reasons: 116-1

-TRAFFIC – the submitted traffic study is irrelevant to this this issue when it is studying patterns in January and February from 2018. The Snoqualmie Valley is, as I describe it, "King County's Playground" in the spring and summer. Visitors descend on the area to hike, float, motorbike and more. This brings business to the area, but while visitors increase, our road capacity HAS NOT. Anyone living along 202 can tell you that traffic is increasing at a dangerous rate. The Snoqualmie Falls area alone requires police control every weekend during spring and summer months. As a data point, I no longer recreate in Snoqualmie due to the horrible traffic and congestion at the falls in the spring/summer. I am an equestrian and I moved my horse to Fall City so I wouldn't have to deal with that every weekend. Consequently, I don't bring my dollars to Snoqualmie for grocery shopping, gas, etc. because I don't want to hassle through those traffic jams as a local. With this mill expansion, that traffic will be worse.

-ENVIRONMENT – the Snoqualmie Tribe purchased the Salish and stopped the continued expansion of the Salish in November 2019. There are ramifications down stream every time more impervious surfaces are created in the upper valley. And I took a quick glance at the environmental review from Cook Scientific that points to hazardous substances at the old mill site.

" ...The land is nearly flat along the course of the Snoqualmie River that is naturally subject to frequent flooding. At its closest point, the western side of the project property is within approximately 500 feet of the Snoqualmie River. All the ditches on the site flow into the Pond/Borst Lake. Stating they are unrelated is nothing more than wishful thinking. Human possession is not a criteria that is viable with respect to assessing if adjacent tracks of land influence each other. Flooding on either (or most likely BOTH) sites could cause historic toxins to travel from the Pond/ Borst Lake to the Snoqualmie River where they will travel downstream (Figure 4). A memo from 1992 from King County Surface Water Management identifies that flooding of as much as 4.5 feet flooded the Weyerhaeuser offices on the proposed Mill Creek site from the Mill Pond Mill Pond/Borst Lake) site during high volume storm events..." 116-2

-TIMING - I agree and support the statement on the first page of the Cook Scientific report:

" I feel it important to note for the record that the public has been given only a short amount of time to perform this review during a pandemic; a time when resources are impossible to obtain because offices are closed and agency people are 116-3

difficult to reach. It is undemocratic to allow permits to go forward during this difficult time."

When I first heard about this project in the spring of 2020, I was so overwhelmed by the pandemic and just felt it was considered a "done deal." But the more I read from my friends in the community, I realized that I needed to state my case and add my voice. I love the Snoqualmie River, I love our Valley and I support growth in our Valley. But this project seems wrong and needs MORE REVIEW. We have enough "things" to attract people to your lovely city – trains, the falls, golf, hiking, and the casino. Let's not overwhelm our community to the point that those of us who live here and love our community give up and stop fighting. That's how I feel. Please consider these points. Thank you! Helene Wentink – 36102 SE49th St.,Fall City, WA 98024
425-442-1268

Sent from **Mail** for Windows 10

Letter No. 117

Mark Hofman

From: Maura T Callahan <hillhousehome@gmail.com>
Sent: Friday, July 10, 2020 4:58 PM
To: Shared Mill Site EIS
Subject: Mill Site Expansion

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

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Although at first it sounded like a great idea - more employment opportunities, more tax income for the city, more attractions for the roaming tourists - I have several large concerns about some aspects of the Mill Site Proposal. 117-1
First, there is much concern with disturbing the ground on this property what with the EPA's designation of it as a hazardous site. A very thorough examination is warranted at the very least.
Second, the idea of having thousands of visitors visiting this area could easily overwhelm the property negatively in multiple ways. Such as: the water usage. Where is the water coming from to service these businesses and industry? The surrounding residential areas depend on their wells for their water, which can already be compromised in drought years. 117-2
The noise level: in the past residents were easily able to hear the Casino concerts and they were several miles further away. Allowing an amphitheater holding concerts blasting music so close to so many homes, not to mention the wildlife we share our properties with, is not healthy for them or for us. How would the noise be mitigated? 117-3
Third, there are only three roads that lead to this property. Weaving through residential areas of North Bend (some of which is stated 25 mph) that then leads to Reinig Road, already a well traveled arterial with our local traffic. Then there is our one-way Meadowbrook Bridge (I can't imagine tourists having the patience to wait for the green light on either side of that!) and the busy roundabout near the Falls. Even spreading the traffic out between these avenues there is no way they can handle any significant traffic increase. 117-4
And lastly, I have little to no confidence that all of the rules and regulations will be followed by the development company or the city overseeing it, as they have already shown a disregard for the simple permitting for a parking lot (two years in a row), let alone all of the rules they are going to need to follow. What assurances are there that the city, already with an unreliable record for holding them accountable, will be met? 117-5
A serious look at these as well as other questionable aspects of this proposal needs further investigation and review.

Thank you,

Maura T Callahan
Hill House Home
6824 409th Ave SE
Snoqualmie WA 98065
Hillhousehome@gmail.com

Letter No. 118

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

Mark Hofman

From: Julie Lake <juliehlake@gmail.com>
Sent: Friday, July 10, 2020 11:50 PM
To: Shared Mill Site EIS; Mark Hofman; Bob Sterbank
Subject: DEIS--Snoqualmie Mill PCIP
Attachments: Snoqualmie Mill Fill Site Permit Application.pdf 8-31-2015.pdf

Categories: Green category

CAUTION :This email originated from outside the City of Snoqualmie. Do not click links or open attachment unless you recognize the sender and know the content is safe.

Mark Hofman,

Following are some of my comments about the Mill Site DEIS.

Over the years, I have already sent you every possible report that I have found, referring to toxins at the Mill Site, and have complained repeatedly to the City about Snoqualmie Mill Ventures' permit violations. The aspiring developers are blatantly bad actors who routinely, even arrogantly, commit repeated violations, and I strongly recommend the City discontinue doing any kind of business with them. It is unacceptable and unconscionable for Snoqualmie City officials to not insist that they follow the rules. 118-1

For example, You have been fully aware of the developer's stormwater discharge monitoring violations over the years, yet you continue to permit this developer's bad practices, which have been demonstrable from the beginning. I refer you to the attached Construction Stormwater General Permit application, on which one of the aspiring Mill Site developers, Tom Sroufe, preposterously claimed to be unaware of any contaminated soils or groundwater contamination on the site!

In recent months, the violations at the Mill Site have gone beyond monitoring problems to problems with pollution (Ph and turbidity), and they have not even submitted wastewater discharge reports to the Department of Ecology since January of this year.

I will refer you to other professional reports that have been submitted to you regarding the need for actual, pre-development, environmental mitigation. My concerns are the same as those expressed in the reports and analyses. 118-2

I am currently unable to submit a complete comment, because The Mill Site DEIS comment period is insufficient, as the City is unable to accommodate my Pubic Records Request in time for me to review the information before the deadline. This is a result of the City Council having approved limiting the amount of time City personnel may spend to accommodate requests made by citizens who wish to exercise their right to have access to public records. 118-3

Therefore, I am once again requesting an extension on the comment period for the Mill Site DEIS. Alternatively, considering the reports and professional analyses I have read about it, it seems advisable for you to scrap the DEIS, and the development proposal, altogether.

Speaking of alternatives, no truly alternative proposals were outlined in the Mill Site DEIS, as required. 118-4

Problematically, the response to my initial public records request was late, in violation of the Washington State Public Records Act. 118-5

A concern that comes to mind about the proposed project and the traffic it will generate, is one I did not see commented upon in any of the reports. It is the condition of the Kimball Creek bridge, repairs of which are not funded. I understand it has been in need of repair or replacement for a number of years, as I recall listening to the audio recording of an Economic Development Commission meeting from around 2011, in which it was discussed. 118-6

You are already aware that the Meadowbrook Bridge is one lane, not two, as indicated in the DEIS, and that both that bridge and the 202 bridge are in serious need of repairs, but, as is the case of the Kimball Creek bridge, have not been funded.

The independent traffic study you will be receiving outlines the problems with the 202 and Meadowbrook bridges, but I don't recall that it mentioned the Kimball Creek bridge, which is why I mention it here.

Another concern is the dire, detrimental financial effect this proposal could have on the downtown Snoqualmie businesses. The Eastside hardly needs more places to shop, dine, listen to music, and drink wine, and all of those are available in downtown Snoqualmie. My concern is that having all of those offerings in one place in this proposed development will draw critical tourist revenue away from downtown, where the businesses are already struggling badly due to the global pandemic. 118-7

I am vehemently opposed to a music venue at the Mill Site because of the devastating effect of noise and light pollution on wildlife, and also the fact that the river acts like a large amplifier. The noise will be unbearable, as will the traffic. The Mill Site is an elk corridor, and home to Ospreys, Eagles, and Great Blue Herons, which I see flying out of there on nearly a daily basis, and of course numerous other species of flora and fauna inhabit the site, as well. 118-8

I'll comment more fully after I have received the remaining batches of my public records requests. You will need to take my comments into account at that time (unless you extend the DEIS comment deadline), since the City personnel were unable to provide all of the documents I requested well enough in advance of the deadline for me to review them.

Thank you for the opportunity to comment on this matter.

See attachment.

~Julie Lake
Board Member, Snoqualmie Citizen Action Network (SCAN)
Member, Sierra Club
Citizen of Snoqualmie

--
Julie H. Lake
PO Box 1748
Snoqualmie, WA
98065-1748
303-819-0096

Did you know you can submit your NOI electronically using our secure, easy to use online system? www.ecy.wa.gov/programs/wq/stormwater/construction/enoi.html

DEPARTMENT OF ECOLOGY
State of Washington

NOTICE OF INTENT (NOI) APPLICATION FORM

Construction Stormwater General Permit

Check if applicable:
- ☐ **Change or Update Permit Information**
- ☐ **Modification of Permit Coverage**

Permit #WAR_____

DEPARTMENT OF ECOLOGY
JUL 31 2015
WATER QUALITY PROGRAM

Please print or type all sections of this application. All fields are required unless otherwise marked. *(use [tab] to navigate through fields)*

I. Operator/Permittee (Party with operational control over plans and specifications or day-to-day operational control of activities that ensure compliance with Stormwater Pollution Prevention Plan (SWPPP) and permit conditions. Ecology will send correspondence and permit fee invoices to the permittee on record.)

Name: Tom Sroufe		Company: Brookwater Advisors, LLC	
E-mail: tom@brookwateradvisors.com		Unified Business Identifier (UBI): none *(UBI is a nine-digit number used to identify a business entity. **Write "none" if you do not have a UBI number.**)*	
Business Phone: 425-444-0822	Ext.		
Cell Phone (Optional): 425-444-0822	Fax (Optional):		
Mailing Address: 8306 428th Avenue SE, Snoqualmie, WA 98065		City: Snoqualmie	State: WA / Zip + 4: 98065

II. Property Owner (The party listed on the County Assessor's records as owner and taxpayer of the parcel[s] for which permit coverage is requested. Ecology will not send correspondence and permit fee invoices to the Property Owner unless he/she is also the permittee. The Property Owner information will be used for emergency contact purposes.)

Name: Snoqualmie Mill Ventures, LLC		Company (if applicable):	
Business Phone:	Ext.	Unified Business Identifier (UBI): *(UBI is a nine-digit number used to identify a business entity. **Write "none" if you do not have a UBI number.**)*	
Cell Phone (Optional): 425-444-0822	Fax (Optional):		
E-mail:tom@brookwateradvisors.com			
Mailing Address: 8306 428th Avenue SE, Snoqualmie, WA 98065		City:	State: / Zip + 4:

III. On-site Contact Person (Typically the Certified Erosion & Sediment Control Lead or Operator/Permittee)

Name: TBD		Company:		
Business Phone:	Ext.	Mailing Address:		
Cell Phone (Optional)	Fax (Optional):	City:	State:	Zip + 4:
E-mail:				

IV. WQWebDMR (Electronic Discharge Monitoring Reporting)

You must submit monthly discharge monitoring reports using Ecology's WQWebDMR system. To sign up for WQWebDMR, or to register a new site, go to www.ecy.wa.gov/programs/wq/permits/paris/portal.html. If you are unable to submit your DMRs electronically, you may contact Ecology to request a waiver. Ecology will generally only grant waiver requests to those permittees without Internet access. Only a permittee or representative, designated in writing, may request access to or a waiver from WQWebDMR. To have the ability to use the system immediately, **you must submit the Electronic Signature Agreement with your application.** If you have questions on this process, contact Ecology's WQWebDMR staff at WQWebPortal@ecy.wa.gov or 800-633-6193 or 360-407-7097 (local).

V. Site Information

Site or Project Name
Snoqualmie Mill Site - Fill Site

Street Address or Location Description (*If the site lacks a street address, list its specific location. For example, Intersection of Highway 61 and 34.*)

7001 396th Drive SE, Snoqualmie, WA 98065

Parcel ID#: *292408-9006* (*Optional*)

Type of Construction Activity (*check all that apply*):
- ☐ Residential
- ☐ Commercial
- ☐ Industrial
- ☐ Highway or Road (city ,county, state)
- ☐ Utilities (specify): _____.
- ☒ Other (specify): Vacant - Stockpile site.

Site Acreage
Total size of your site/project, including support activities such as off-site equipment staging yards, material storage areas, borrow areas, etc. (that you own/control): 4.92 acres.

Total area of soil disturbance (grading and/or excavating) for *your* site/project over the life of the project: 4.92 acres. (*Note: 1 acre = 43,560 ft².*)

Concrete / Engineered Soils
How many yards of concrete will be poured over the life of the project? N/A yd³ **(estimate)**

How many yards of recycled concrete will be used over the life of the project? N/A yd³ **(estimate)**

Will any engineered soils be used? (For example: manufactured soil stabilizers, fly ash, cement treated base, cement kiln dust, etc.)
☐ Yes ☒ No

City (or nearest city): Snoqualmie
County: King

Zip Code: 98065

Estimated project start-up date (mm/dd/yy): 08/31/15

Estimated project completion date (mm/dd/yy): 09/01/16

Record the latitude and longitude of the *main entrance* to the site or the approximate center of site.

Latitude: 47.53624 °N Longitude: -121.81773 °W

VI. Existing Site Conditions

1. Are you aware of contaminated soils present on the site? ☐ Yes ☒ No
2. Are you aware of groundwater contamination located within the site boundary? ☐ Yes ☒ No
3. If you answered yes to questions 1 or 2, will any contaminated soils be disturbed or will any contaminated groundwater be discharged due to the proposed construction activity? ☐ Yes ☒ No

["Contaminated" and "contamination" here mean containing any hazardous substance (as defined in WAC 173-340-200) that does not occur naturally or occurs at greater than natural background levels.]

If you answered yes to Question 3, please provide detailed information on the locations, contaminants, and contaminant concentrations (if known), and pollution prevention and/or treatment Best Management Practices (BMPs) proposed to control the discharge of soil/groundwater contaminants. This information should include related portions of the Stormwater Pollution Prevention Plan (SWPPP) that describe how contaminated and potentially contaminated construction stormwater and dewatering water will be managed.

VII. Stormwater Pollution Prevention Plan (SWPPP)

You must develop a SWPPP prior to starting construction. Do **not** submit your SWPPP with your application. The exception is that Ecology may request a copy of all or part of the SWPPP if you answered yes to the questions in Part VI.

VIII. Best Management Practices (BMPs)

You must use the BMPs listed in the Stormwater Management Manual for Western Washington or the Stormwater Management Manual for Eastern Washington or other manuals approved by Ecology. Alternatively, you may use demonstrably equivalent BMPs on the basis of permit condition S9.C.4. If you intend to use a BMP at your site that is not included in these manuals, but that you believe meets the definition of a *demonstrably equivalent* BMP, you must notify the appropriate regional office. www.ecy.wa.gov/programs/wq/stormwater/construction/contacts.html (See Definitions in the Construction Stormwater General Permit).*

**Note that if you receive permit coverage without indicating the preference for a demonstrably equivalent BMP and later decide to use one, you must provide Ecology with notice of the selection of an equivalent BMP no less than 60 days before the intended use of the equivalent BMP.*

IX. Discharge/Receiving Water Information

Indicate whether your site's stormwater and/or dewatering water could enter surface waters, **directly** and/or **indirectly**:

☒ Water will discharge directly or indirectly (through a storm drain system or roadside ditch) into one or more surface waterbodies (wetlands, creeks, lakes, and all other surface waters and water courses).

If your discharge is to a storm sewer system, provide the name of the operator of the storm sewer system:

(e.g., City of Tacoma): _____

(NOTE: If your stormwater discharges to a storm sewer system operated by the City of Seattle, King County, Snohomish County, City of Tacoma, Pierce County, or Clark County, you must **also** submit a copy of this NOI to the appropriate jurisdiction.)

☐ Water will discharge to ground with 100% infiltration, with no potential to reach surface waters under any conditions.

If your project includes dewatering, you **must** include dewatering plans and discharge locations in your site Stormwater Pollution Prevention Plan.

Location of Outfall into Surface Waterbody

Enter the outfall identifier code, waterbody name, and latitude/longitude of the point(s) where the site has the potential to discharge into a waterbody (the outfall). Enter **all** locations. **See illustration of Surface Waterbody Outfall locations at the end of this form.**

- Include the names and locations of both direct and indirect discharges to surface waterbodies, even if the risk of discharge is low or limited to periods of extreme weather. **Attach a separate list if necessary.**
- Give each point a unique 1-4 digit alpha numeric code. This code will be used for identifying these points in WQWebDMR.
- Some large construction projects (for example, subdivisions, roads, or pipelines) may discharge into several waterbodies.
- If the creek or tributary is unnamed, use a format such as "unnamed tributary to Deschutes River."
- If the site discharges to a stormwater conveyance system that in turn flows to a surface waterbody, include the surface waterbody name and location.

Outfall Identifier Code. These cannot be symbols. (Maximum of four characters).				Surface Waterbody Name at the Outfall	Latitude Decimal Degrees	Longitude Decimal Degrees
Example: 001A				**Example:** Puget Sound	47.5289047° N	-122.3123550° W
0	0	1	A	Roadside Ditches	47.53990° N	-121.81795° W
0	0	1	B	Mill Pond	47.53624° N	-121.81773° W
0	0	1	C	Snoqualmie River	47.53078° N	-121.82319° W

If your site discharges to a waterbody that is on the impaired waterbodies list (e.g., 303[d] list) for turbidity, fine sediment, high pH, or phosphorus, Ecology will require additional documentation before issuing permit coverage and these sites will be subject to additional sampling and numeric effluent limits (per Permit Condition S8). Ecology will notify you if any additional sampling requirements apply. Information on impaired waterbodies is available online at: http://www.ecy.wa.gov/programs/wq/303d/index.html .

X. State Environmental Policy Act (SEPA)

This Notice of Intent (NOI) is incomplete and cannot be approved until the applicable SEPA requirements under Chapter 197-11 WAC are met.

Who is the SEPA lead agency on your site? City of Snoqualmie .

Has the SEPA lead agency issued a final decision on your checklist? (if there is a comment period, the SEPA decision is final at the close of the comment period) ☒No ☐Yes ☐ **Exempt* (*attach written documentation if Exempt).**

If No: The NOI is incomplete. Ecology will hold the application until a final SEPA decision is made or the Construction Stormwater NOI public comment period ends, whichever is later. **You must notify Ecology once the SEPA lead agency has issued a final decision following any comment period.**

If Yes: Type of SEPA threshold determination issued: ☐ Determination of Non-Significance (DNS) ☐ Mitigated DNS (MDNS) ☐ Determination of Significance (DS) ☐ Final Environmental Impact Statement (EIS) ☐ Other: _____

- Date when SEPA comment period ended or will end: _____.

Notify Ecology if the SEPA determination is appealed. *More SEPA information is available at: www.ecy.wa.gov/programs/sea/sepa/e-review.html.*

XI. Other Ecology National Pollutant Discharge Elimination System (NPDES) and/or State Waste Discharge Permits

List any other Water Quality permits (Industrial stormwater, Individual stormwater, etc.) for this site:

Name of Water Quality Permit	Permit Number

XII. Public Notice

You must publish a public notice at least once a week for two consecutive weeks with at least seven days between publications, in a newspaper of general circulation in the county in which the construction is to take place. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the second public notice.

Mail or fax (360-407-6426) the NOI to Ecology on or before the first public notice date. If you fax the public notice to Ecology, you must also mail a hard copy. Failure to do so may delay the issuance of your permit.

Provide the exact dates (mm/dd/yy) that the first and second public notices will appear in the newspaper(s):

Name of the newspaper publishing the notices: Snoqualmie Valley Record

First notice: 08/05/2015

Second notice: 08/12/2015 (Begins 30-day public comment period.)

For example: First notice: Friday 01/01/14 Second notice: Friday 01/08/14

PUBLIC NOTICE TEMPLATE

Complete this template using project-specific information and submit to a local newspaper with general circulation within the county where the project is located. The language in **bold** is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or **attach on a separate sheet of paper, if necessary.**)

Snoqualmie Mill Ventures, LLC, 8306 428th Avenue SE, Snoqualmie, WA 98065, **is seeking coverage under the Washington State Department of Ecology's Construction Stormwater NPDES and State Waste Discharge General Permit.**

The proposed project, Fill Site, **is located at** 7001 396th Drive SE in Snoqualmie, in King County.

This project involves 4.92 **acres of soil disturbance for** clearing and grading **construction activities.**

(List all construction activities; for example, residential, commercial, industrial, highway, utility).

The receiving water(s) is/are roadside ditches that drain to Mill Pond, then to the Snoqualmie River (List all named and unnamed surface waterbodies, or ground water if applicable, waters identified in section IX).

Any persons desiring to present their views to the department of Ecology regarding this application may do so in writing within thirty days of the last date of publication of this notice. Comments shall be submitted to the department of Ecology. Any person interested in the department's action on this application may notify the department of their interest within thirty days of the last date of publication of this notice. Ecology reviews public comments and considers whether discharges from this project would cause a measurable change in receiving water quality, and, if so, whether the project is necessary and in the overriding public interest according to Tier II antidegradation requirements under WAC 173-201A-320.

Comments can be submitted to:
Department of Ecology
Attn: Water Quality Program, Construction Stormwater
PO Box 47696, Olympia, WA 98504-7696

XIII. Certification of Permittees

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Tom Sroufe / Brookwater Advisors, LLC
Printed Name / Company

MANAGING MEMBER
Title

Signature of Operator/Permittee

7/28/15
Date

*** Signature of Operator/Permittee requirements:**

A. For a corporation: By a responsible corporate officer of at least the level of vice president.
B. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively.
C. For a municipality, state, federal, or other public facility: By either a principal executive officer or ranking elected official.

Please sign and return this document to the following address:

Department of Ecology
Attn: Water Quality Program, Construction Stormwater
PO Box 47696
Olympia, WA 98504-7696

Letter No. 119

Mark Hofman

From: monica lowney <monicalowney14@yahoo.com>
Sent: Saturday, July 11, 2020 12:00 AM
To: Mark Hofman; Mark Hofman; mhofman@snogualmiewa.gov; Shared Mill Site EIS
Subject: Fw: BD comments to be added to Supplemental Letter
Attachments: BD comments to be added to Supplemental Letter.docx

Categories: Green category

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

July 10th 2020

City of Snoqualmie Mill DEIS
Attn. Mark Hoffman SEPA Representative

Dear Mark,

Thank you for the opportunity to comment on the DEIS for the Snoqualmie Mill Site. Please see my attached document which explains some concerns that I have regarding the DEIS.
Please respond to me that you have received this letter. This will be the third email I have sent to you in the past two days and I have not received a confirmation of acceptance.

Thank you,

Monica Lowney
Sierra Club/Community Advocate
SCAN Member

---- Forwarded Message ----

Attached are some comments for you to consider adding to our "catch-all" Supplemental Letter.

They might be redundant, but I selected them from my list based on what I thought might not be specifically addressed in this precise way.

Might be helpful.

1. The development primarily serves regional urban uses, but will have negative impacts on the surrounding rural and resource areas. This is contrary to Countywide Planning Policies. Adopted regional SEPA planning documents did not consider the impacts of this large development on rural and resource areas, so that deficiency must be addressed in this EIS. 119-1

2. The Transportation analysis does not adequately consider "SEPA gaps" that will occur because of the City's inadequate transportation concurrency management system. 119-2

3. "SEPA gaps" exist because the City's adopted code and processes regarding stormwater, groundwater, and flooding impacts will not provide adequate conditions to address all significant adverse environmental impacts. 119-3

4. The DEIS does not consider the probability that the project will violate adopted health department noise standards. 119-4

5. Impacts to all affected offsite properties are not considered.

6. Impacts to neighboring jurisdictions and tribes are not fully considered. 119-5

7. The DEIS does not consider the cumulative impacts of approved and pipeline projects in the region and surrounding areas together with the proposed project's impacts. 119-6

8. The DEIS does not consider all relevant environmental reviews that have been conducted by King County and other agencies on the site and on properties that will impact or be impacted by the proposed development. 119-7

9. The EIS should do more than merely *identify* issues that the City Council retains discretionary authority to approve or disapprove flexibility options under SMC 17.20.050 and 19.12.170. The EIS should identify and consider the impacts from the full range of discretionary options available under the code. SEPA's purpose is to inform decision makers about the environmental impacts of their actions, and this should include the full range of future actions that could be taken during the PCI and Development Agreement review. 119-8

10. The EIS assumes that flood plain impacts will be evaluated later during subsequent development reviews. SEPA requires impacts to be evaluated at the earliest time that impacts can be reasonable known. Detailed analysis at this point in the development review process will provide for the widest range of options regarding land uses, locations, and mitigations. The project is described in sufficient detail to allow for a thorough review in the DEIS. 119-9

11. The DEIS assumes no impact to air quality or greenhouse emissions based on the assumption that since there are no adopted emission standards, no impact can be identified. SEPA requires the evaluation of impacts regardless of whether there are adopted standards. Additionally, greenhouse gas emissions from this large project site can and should be estimated and evaluated separate and apart from the City's overall emissions. 119-10

12. The EIS should not just list toxic chemicals that are present on the site; it should identify and evaluate the health and environmental risks associated with each chemical along with a risk analysis of the potential for release into the environment. 119-11

13. The EIS should not defer the characterization of contaminants to a later point for Phases 2 and 3. Moreover, the characterization of Phase 1 is insufficient. The document has no reasonable basis for its determination that there is a low risk of release, fire or explosion. 119-12

14. Steep slopes adjacent to Phases 2 and 3 should be evaluated now. Considering these impacts only programmatic may preclude future mitigation options. 119-13

15. The EIS should do more than "a high level review" of the City's Shoreline Management Act Plan. 119-14

Letter No. 120

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Auryel van Gemert <auryelross@hotmail.com>
Sent: Friday, July 10, 2020 8:49 PM
To: Mark Hofman
Subject: Comment on the DEIS Mill Planned Commercial/Industrial Plan
Attachments: Image 1 July 5 2020 Tokul.jpg; Image 2 tokul roundabout July 5 2020.jpg; Eagle 3-09-20 Mill Pond.jpeg; Osprey 8-22-17 Mil Pond.jpeg; DEIS Comment for the Snoqualmie Mill Planned Commercial Industrial Plan.rtf

Categories: Green category

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Thank you,
Auryel van Gemert

July 10, 2020

City of Snoqualmie
Department of Community Development
Mark Hofman, Community Development Director and SEPA Responsible Official

Dear Mr. Hofman,

I am writing as a concerned citizen, Climate Reality Leader and Board Member of the Snoqualmie Community Action Network (SCAN) regarding the proposed Snoqualmie Mill Planned Commercial/Industrial Plan. In addition to my personal comments, I wish to incorporate in my comments, by reference, comment letters that have been submitted by the Department of Ecology, including those submitted by the Toxics Cleanup Program, the Water Quality Program, and the Wetlands and Shorelands Program as well as those submitted by the several specialists on behalf SCAN. 120-1

I am not a lawyer or scientist, just someone who loves where I live, my rural community and nature itself. I have looked over the DEIS and it is an overwhelming document. Of the many of the issues that concern me in the DEIS, two of are of greater importance. First, the devastating impact of building on a hazardous waste site and what it will do to our waterways and second, the congestion and noise that will come if the development moves forward due to lack of reasonable infrastucture and plans to mitigate this. I was on HWY 202 heading towards Fall City on Sunday, July 5, 2020, and the Tokul roundabout was backed up over the bridge past the Snoqualmie Parkway - this was just for people out going to the Salish Lodge and falls (attached images 1 and 2.) I cannot imagine what sort of outcome this development will have on our roadways and how it will increase air pollution and traffic in our community. Additionally, I feel that anything that contributes to the polluting of our water resources should be halted and remediated immediately, regardless of any development. 120-2 120-3

What stood out to me personally was the destruction of habitat and loss of intact ecosystems. In the DEIS there is comment on the complete loss of habitat for the wildlife and it is stated that it is certain the local wildlife (eagles, osprey, elk, bear and cougar, attached images 3 and 4] that live in the area will be killed and "urban" wildlife will move in. This is a unacceptable outcome, not only for the animals but for our wonderful rural community that thrives on outdoor experiences, the impact of nature on our health and the halting of ecotourism (the falls brings so many people to our area each year). In an unprecendented time of climate change, it is wrong to put our ecosystems at further risk, weakening further the possibility of a liveable future for our children. 120-4

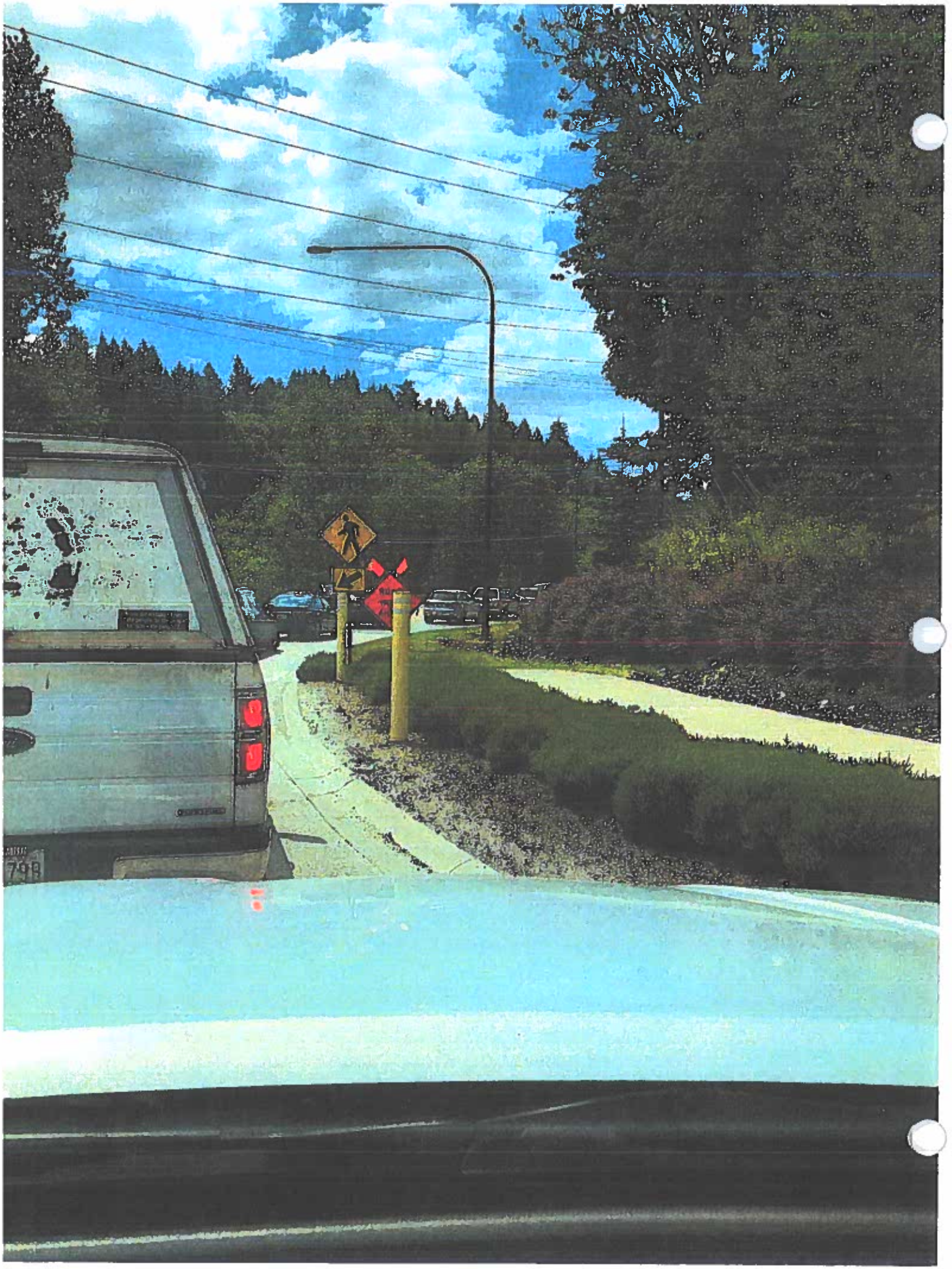
One of the first solutions to climate justice is to stop cutting down trees. Cutting down trees and dismantling ecosystems is the prime reason of climate change. Every year, 33 million acres of forests are cut down. We need to be a solution to this as a community, not the cause. 120-5

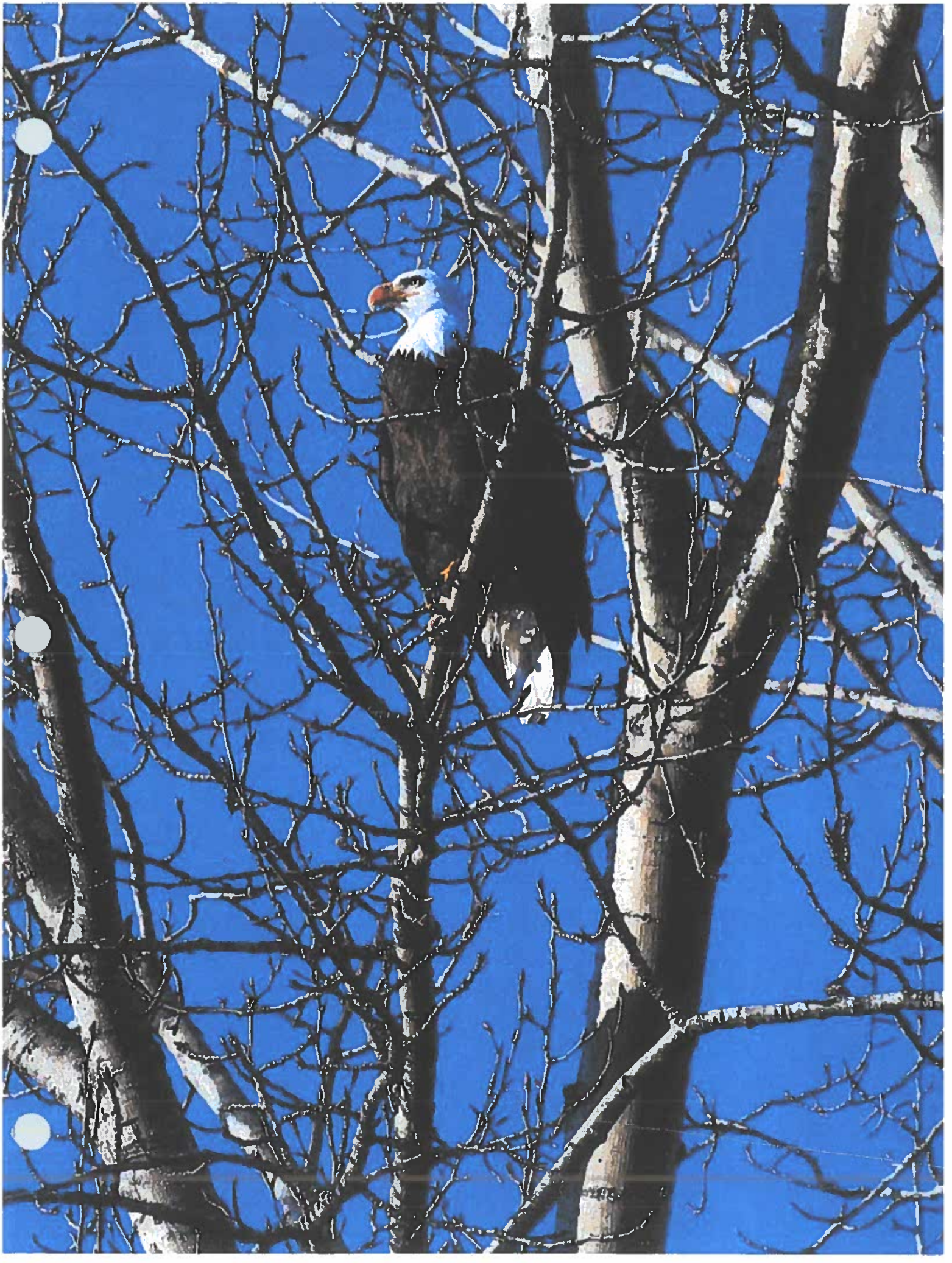
I feel strongly that we must ensure the conservation of biodiversity and the survival of many species and habitats which are threatened due to human activities. This growing and intact ecosystem needs to be protected, not cut down and diminished and overtaken by even more destruction and pollution. We should be conserving biodiversity and securing valuable natural resources for future generations and protecting the well being of eco-system functions.

Sincerely,

Angel van Gemert









121

no attachments

Mark Hofman

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Wayne <waynestuff@comcast.net>
Sent: Friday, July 10, 2020 7:57 PM
To: Shared Mill Site EIS
Cc: Dick Scheel
Subject: Mill Site DEIS Comments
Attachments: Mill site DEIS.docx; 20191220_122438.jpg; 20191220_122428.jpg; Wayne's GPS Elevation.pdf

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hoffman,

Please find attached some concerns we have featured in the DEIS for the Mill Site.

The GPS elevations ass well as the photos were previously submitted to both the City Council and Planning Comission.

Your consideration of these items will be appreciated,

Sincerely,
Wayne A Russell
8438 Meadowbrook Way SE,
Snoqualmie, WA 98065

Wayne A. Russell

Addendum to Initial DEIS Comments from Public Meeting already submitted!

As a resident of Snoqualmie since 1984 and the upper valley since 1979 I have grave concerns of issues with flooding, drainage and environmental impacts as well as traffic on the Tokul Road, Hwy 202 and Meadowbrook Way with the new 2000 plus student potential which doesn't appear to be updated or adequately addressed in the DEIS.

Mentioned in the Snoqualmie Mill PCI Plan dated April 2020 are several issues that need to be addressed further.

A)-under item 1.7.3 Water Resources

Page 1-14 it is stated post construction would increase surface water flow in a greater amount to wetland system and discharge to Snoqualmie river and Borst Lake. Borst Lake has been purposely left out but is further in the DEIS is listed as a discharge point for the Mill site? The weir which maintain s Lake level has been plugged which is also in the DEIS as being repaired in 2009 Section 3,3.1?

This has caused the East retaining berm of the Mill pond to breach and become the controlling factor of the lake level and ha eroded extensively over the past two years during flooding of the Mill Pond road which eventually will cause Mill Pond road failure.

121-1

Photographs attached.

B)-page 1-15 Flooding

a) Development filling portions of the floodplain and compensate by excavating potentially contaminated soil in other areas?
b) Lowering grades of berms illegally installed after the 1990 flood (left in the hands of a county hearing examiner)
c) Wetlands for storm water treatment to be maintained by private also mentioned. If private decides not to maintain who will maintain or will cost be passed on to prospective tenants?

121-2

121-3

C)-page 1-20 Grading of properties of above the BFE per SMC 15.12 for storage of hazardous materials. Means more excavation for floodwater retention.

D)- under item 2.0 Proposal and Alternatives

1-section 2.2-page 6 Existing site conditions

a) Fill added 5' to 20' better documentation should be provided from Weyerhaeuser as to surveys prior to annexation of elevations on site
b) Mentions being in the floodplain with exception of the elevated berms installed after the 1990 flood illegally and even mention contribute to flooding.
c) Floodway changed to Floodplain after an LOMR in 2010 done by the city for downtown renovation which included the North side of the river when it was not part of the city? Why did city taxpayers pay for something that should have been paid for by the property owners instead of residents of the city?

121-4

2-Berm installation mentioned but was put in place after the 1990 flood and not the mid 80's to keep logs

in the sort yard. The berm at the time of installation was entirely in the floodway and not the floodplain as mentioned. This designation from Floodway to Floodplain was changed by the 2010 LOMR to change prospective building codes for prospective developers.

3-pages 8 & 9

a) Berm installed to prevent flood waters from entering the Mill Site which was done reiterating t e fact prior to the 2010 LOMR changing the designation from Floodway to Floodplain
b) Fill was added again illegally behind the berm in the floodway
c) County hearing examiner ruled against the city to have it removed.

121-4

4-section 2.3 Objectives and Proposals

a-page 2- 18 shows the sequential removal of Dirtfish as development proceeds

b-page 2-23 Mentions the realignment of the Mill Pond road and entrance to proposed Mill street.

This is illustrated in Exhibits 2-3-1, 2-3-4, & 2-3-5 showing a Round-a-bout with drainage and a wildlife underpass? To accomplish this road elevations would have to be elevated to almost th BFE of 420' when current topography from the weir at Borst Lake is approximately 404' and a you proceed to what is referred as the haul road (5 mile pit entrance) elevations do not exceed410'. Page 2-26 Has description of Wildlife underpass and floodwater.
Parallel to this haul road with a conveyance channel that effluent from the Girard recycling facility during the evening hours overflows into the ditch without filtration. This ditch also originates in unincorporated King county and the quarry and flows through the west wetland area of the site which at times has stagnant water alongside the haul road. I do not believe thi has been detailed in the DEIS?

121-5

d-Truck traffic will increase with the warehousing using the haul road and already has excessiv traffic going to the quarry and Five Mile pit and West of Tokul road for disposal of materials from other sites excavations such as when Microsoft underground parking was excavated several years ago.

121-6

e- Also mentioned is the expansion and replacement of the SR-202 bridge in the Snoqualmie Transportation Plan but not in the current WSDOT plan so will this expense be passed on to citizens or developer? Occasionally unmentioned has been talk of a bridge traversing the Snoqualmie River from the Snoqualmie Parkway which would be an added revenue burden to the city and loss of patrons for Snoqualmie businesses both downtown and on Snoqualmie Ridge.

121-7

f-Development in the Floodplain- Fill and compensatory storage is of grave concern as indicated on page 2-27. Fill again for area one on page 2-36. Too much movement of fill in the floodplain.

121-8

g- page 2-36 again mentions the drainage using the culvert paralleling Girard by the haul road that the storm water system will be privately owned and maintained what guarantee that this will stay economically feasible?

121-9

E) Section 3.3 Water Resources

1. Section 3.3.1

   a-Drainage thru Borst lake an various ditches to Snoqualmie river

   b- Borst Lake weir was plugged with rock apparently in 2009 so the lake sought the weakest point and breached the lake containment berm east of the weir and now has a stream paralleling the Mill Pond road. City has been informed at meetings several times. Big concern since the Mill site drainage plan discharges to Borst Lake. 121- 10

   c)LOMR of 2010 done by the city prior to annexation is what is used for the BFE of 420'. This LOMR was done to change Floodway to Floodplain per the FIRM maps to change building codes for downtown Snoqualmie renovation and should not have included the north side of the river for prospective developers at the city cost! 121-11

2. Section 3.3.2

   a. Surface water runoff to Borst Lake
   b. Treatment of runoff discharge?
   c. Changes pervious to impervious
   d. Direct discharge outfall to Snoqualmie river or on-site wetlands which ultimately discharge to Borst Lake or river mentioned on page 3-80? 121-12
   e. Groundwater recharge decrease by impervious surface addition and diverting storm water to other locations?
   f. Stormwater treatment by private? Appendix A
   g. Exhibit 3-3-18 Shows out fall and wildlife crossing which are not feasible at present unless the reconfiguration of Mill Pond road raises the elevation to the BFE? This would have a direct impact on river channel flow during flood events, but may still come under the zero rise element? 121-13
   h. Flooding calls for adding fill above the BFE in the floodplain for construction and excavate potentially contaminated soils in other areas to compensate. This again wonders if the city and developer had met prior to annexation and the 2010 LOMR paid for by the city which changed the designation on FIRM from Floodway to Floodplain which would not have allowed any of this to happen? Developer mentioned at a July 2018 city council meeting that they had an option on the King street lot but had no one interested in doing anything with it since it was in the floodway? This same LOMR took that lot as well as the Mill Site out of the Floodway and changed it to Floodplain and the city then sold the King Street lot? 121-14
   i. Current grade for excavating purposes should be verified prior to annexation and all the fill that was moved after the illegal berm was installed after the 1990 flood and what is hidden from public view, Developer has twice been cited by the city for clearing and grading with out a permit which the developer also stated at 2018 city council meeting they had hauled hog fuel in for the Boeing Classic golf tournament? City just recently changed code to allow wood chips in the floodplain.
   j. Term "Flood storage is assumed as available storage volume"?

3. Section3.3.4
    a. Extensive grading, filling clearing, grading runoff and impervious surfaces
    b. Mitigation would reduce is vague synopsis.
    c. Unavoidable impacts would be avoided if not don

121-15

F. Section 3.4 Plants and Animals

1. Section 3.4.1 Vegetation
    a. Again, refer to Borst Lake as offsite but use for drainage, we believe intentionally left out of the DEIS so not to be analyzed even though the site uses it?
    b. Compacted fill approximate area of parking lot hog fuel hauled in northwest corner? PSE investigated a gas leak with no piping there and determined "Swamp Gas"?
    c. A well drilled for Dirtfish without permits?
    d. Wetland along haul road drains directly to river and is sometimes stagnant?

121-1
121-16
121-17

2. Fish and wildlife
    a. Attached a list of animals know in the area including Osprey and Eagles that nest on Borst Lake. Osprey are not on the list?
    b. The elk herd calves in the Borst/Mill Site area.
    c. With the number of times the DEIS mentions Borst Lake it should not have been left out of this DEIS by Mill Site Ventures?
    d. Too many vague words such as would, could and should used in wetlands, wildlife and vegetation. Japanese Knotweed which is abundant along Mill Pond road not mentioned?
    e. Wildlife underpass shown in Exhibit 3.4-10 Not feasible unless fill is added in reconfiguration of Mill Pond Road to the BFE of 420'? Current elevation at that location is approximately 404'.
    f. Storm water outfalls are of concern if being managed by private? Will burden be palace on city or prospective tenants if not maintained by private?

121-18
121-19

G. Appendix A Master Drainage Plan

1. PCI Planning are 1

    a. Mass grading and removal of berms per 2011 Pre-annex agreement and realignment of Mill pond Road? Realignment per furnished sketches would require intensive fill to provide for a floodwater and wildlife underpass per Figure 2-4?

    b. Figures 2-6 &2-7 Show existing round level at approx. 420' the river at 402' and the BFE at approx. 423' in fig. 2-6? The Mill Pond road at this point is approx. 407'

    c. Fig. 2-7 shows river at 402' with existing ground at 420 feet and finished grade at approximately 422'? This would put the grade for project at approximately the same height as the berms that are to be removed. Anyone can see that the grade behind the berm is or was not that high unless unauthorized grading was done as in the two previous instances where the developer did not obtain permits or unpermitted well drilling on the site?

    d. Again, in drawing 2-8 the BFE at 423' existing ground at approx.' 422 feet with finished grade approx. the same? Sketches are nice, but not reality.

    e. If the city had not pursued the 2010 LOMR for properties that were not in the city this project would not even exist.

121-20

f. There appears to be many variables and uncertainties in the DEIS as to what will be built or done with sewer and water until PCI plans are submitted? If the developer does not know what is or can be built this DEIS is sort of defunct? 121-21

g. Borst Lake Weir mentioned on page 5-6 & 5-7 is not at the weir, but at the berm east of the weir that was overtopped and eroded since the so-called weir repair was blocking it wit rock. The lake found the point of least resistance and over toped the berm which has eroded significantly over the past two years. It now has a stream flowing parallel to the Mill Pond Road and escaping via the original weir culvert which is one of the overflow outlets mentioned several times in this DEIS and preliminary pages. Makes on wonder if this as by design, since it has been mentioned several times at city meetings. 121-22

h. Drainage again mentioned through Borst Lake on page 6.1. If Borst Lake is continually mentioned throughout this DEIS as a function of the development project how has it escaped this DEIS? It mentions in part A page 6.1 that the drainage is via the plugged weir and the culvert but as mentioned above the weir is plugged with large rocks and the actual drainage is via the eastern breach and then the culvert. 121-1

H. Appendix B Soils, Ground water

1. Flood hazards

a. Channel migration hazards

1. Structures <u>not currently planned</u> in in severe with again an exception for Mill Pond Road realignment which by previous exhibits appears to being filled to the BFE?

b. Flood hazard

1. Presumptive that potential impacts could be created by proposed development? 121-23

2. Again fill and excavation of potentially contaminated materials.

c. Significant Unavoidable Adverse Impacts

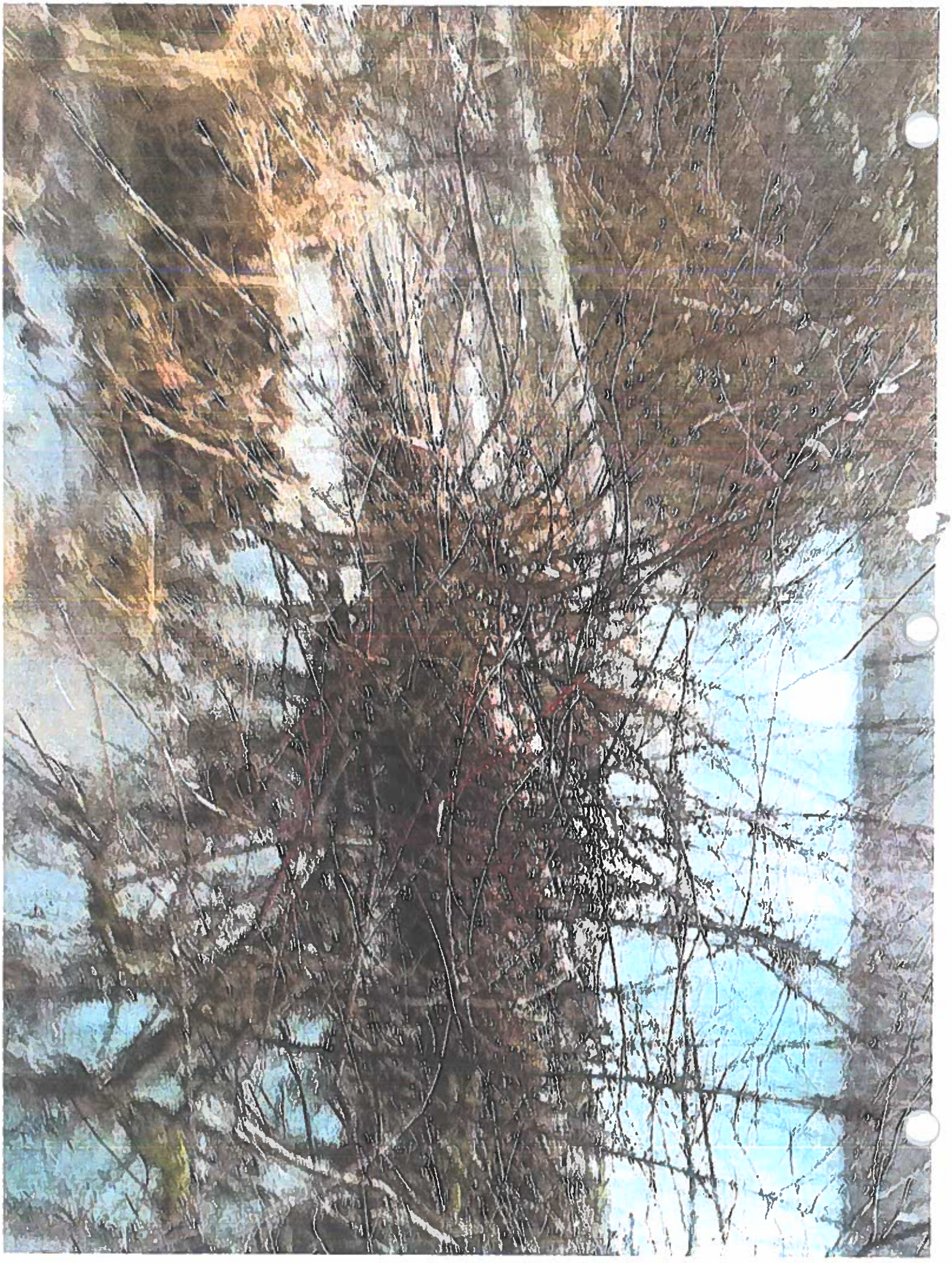
1. Again vague no significant unavoidable impacts again except for exceptionally large floods or seismic events. Do 1990 and 2009 floods count since USGS was not allowed o the site to evaluate after the 2009 flood? Coincidence?

In summary there are too many variables in these portions of the DEIS with exceptions and term used in many industries that would be called as built as. It appears with the new changes in SMC that sole discretion to many items on this list would come down to the sole discretion of the Flood Administrator and PCI with exceptions being granted as permits are applied for? 121-24

We have also taken away most citizen possible participation by moving appeals from the City Counsel to a hearing examiner. I believe the city learned that this would lead more to their liking after experiencing not having the illegal berms removed from this site by the county using a hearing examiner for the appeal and verifying what fill was added by Weyerhaeuser prior to annexation. 121-25

Wayne A Russell

8438 Meadowbrook Way SE, Snoqualmie, WA 98065





Site	NUVi	Legend	Rhino 650	Location
1	404	397	411	My backyard 8438 Meadowbrook
2	389	406	411	Alpine Coach Works
3	406	415	404	At the Weir Boarst lake
4	417	396	402	West end Boarst lake
5	414	385	407	At the Jersey barriers Mill pond Rd.
6	408	394	408	5 Mile Entrance
7	403	389	409	Entrance to PSE & Snoq. Pkwy entrance at 202
8	393	387	395	South end Xmas tree lot
9	364	403	392	Xmas lot at 202
10	370	395	394	Parking lot off 202 at Northern
11	376	403	399	Parking lot off 202 at Fir
12	386	400	404	King & Maple intersection
13	407	400	405	River and Maple Intersection
14	391	406	407	Intersection Newton & Maple
15	369	404	406	Intersection Newton & Falls
16	387	401	409	Intersection River & Falls
17	381	399	406	King & Falls at North end of parking lot
18	394	397	409	King & Railroad at Bus stop
19	369	402	403	Intersection River & Park
20	399	394	403	Intersection Newton & Park
21	386	396	407	Intersection Schusman & Park
22	382	407	411	Intersection Meadowbrook & Park

Readings are in feet

Taken on 01/26/2019

Rhino 650 readings are most accurate using barometric pressure/topograpy for analysis
Nuvi & Legend HCX use topography and are accurate when comparing to topographic maps of area

Mark Hofman

122

RECEIVED
JUL 10 2020
City of Snoqualmie
Community Development Department

From: Dick Scheel <dickscheel@outlook.com>
Sent: Friday, July 10, 2020 11:53 PM
To: Mark Hofman
Subject: Snoqualmie Mill PCI Plan DEIS comments
Attachments: Scheel comments on Snoqualmie Mill DEIS.docx; Snoqualmie Mill PCI Plan DEIS Public Comments.docx; Kathleen Schneider's comments on DEIS.docx

Categories: Green category

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

Dear Mr. Hofman,

I submit the three attached files as comments on the Snoqualmie Mill PCI Plan DEIS. One file contains my own comments, and the other two contain comments that two other local residents asked me to submit for them (because they do not feel comfortable doing it themselves and they know that I am "tech-savvy").

Sincerely,
Richard Scheel
6701 W Crest View Loop SE
Snoqualmie WA 98065
925-786-0078

To: Mark Hofman / City of Snoqualmie

From: Richard Scheel

Date: 7/10/2020

Subject: Comments on the Snoqualmie Mill PCI DEIS

I submit the following comments on the Snoqualmie Mill PCI DEIS. These comments are submitted on my own behalf, and on behalf of the organizations to which I belong:

- Sierra Club
- Snoqualmie Community Action Network (SCAN)

1. Invalidity of the DEIS process

   Please note that this item is not a comment on the DEIS itself. This item asserts that the process for the DEIS public review and comment period is invalid, and should be discarded and replaced by a new review and comment period with all issues remedied.

   I include here by reference my 5/26/2020 email to Mark Hofman and Bob Sterbank with subject "*Disputing the Snoqualmie Mill DEIS process*". In this email thread I present the reasons that the DEIS process is invalid and should be discarded. 122-1

2. My comments on the DEIS

   a. I include here by reference my 5/31/202 email to Mark Hofman with subject "*Additional documentation referenced in the Snoqualmie Mill DEIS*", as well as subsequent emails in that thread, through 6/6/2020. In that email I pointed out one example of the DEIS directing the reader to find supporting information in an external document, but the external document is not available. I point out that the DEIS is not complete unless all documents that it depends on are available to the reviewer. I also pointed out that I only identified one case of such a missing document, but at that time I had only read a tiny fraction of the 2,921 pages of the DEIS, so it is unknown how many other cases of missing documents are also present. It is the obligation of the DEIS authors to carefully review their own document and make sure that all such external documents are accessible to the reviewer. Until all documents that the DEIS depends on are available, the DEIS is incomplete and not ready for public review and comment. 122-2

   b. There is no currently valid Shoreline Master Program. A draft 2019 plan is available on the city website, and was adopted by the City Council in Ordinance 1217 on 8/26/2019, but it has not yet been approved by the Washington State Department of Ecology. As of today, the Department of Ecology website (at https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning/State-approved-Shoreline-Master-Programs/Snoqualmie) shows that the department is waiting on a response from the city. According to **Section 4. – Effective Date** of the ordinance, the ordinance is not yet in effect. 122-3

c. There is no currently valid Water System Plan. The most recent plan was approved by the Washington State Department of Health on 10/9/2013. That approval expired on 10/9/2019. 122-4

d. The DEIS in multiple places states that in only attempts to deal with contamination by toxic substances within the parcel borders of the proposed project. However, in a 2017 email, the Department of Ecology states clearly that an entire contaminated site must be addressed. It cannot be limited to only specific parcels of property. 122-5

> **From:** Tomlinson, Priscilla (ECY) [mailto:PTOM461@ECY.WA.GOV]
> **Sent:** Wednesday, September 27, 2017 11:22 AM
> **To:** Snoqualmie 1st <snoqualmie1st@gmail.com>
> **Cc:** Warren, Bob (ECY) <rwar461@ECY.WA.GOV>; Matt Larson <MLarson@ci.snoqualmie.wa.us>; Bob Sterbank <BSterbank@ci.snoqualmie.wa.us>; Bob Larson <BLarson@ci.snoqualmie.wa.us>; Jason Rogers <JRogers@ci.snoqualmie.wa.us>; Mark Hofman <mhofman@ci.snoqualmie.wa.us>
> **Subject:** RE: Snoqualmie Mill site
>
> Under MTCA, a site is defined by the area where contamination has "come to be located." The definition of the site is not determined by parcel or property lines. When Ecology reviews a remedial investigation, we expect it to completely delineate the nature and extent of contamination and this determines the site boundaries.
>
> Regards,
> *Priscilla Tomlinson*
> *Washington Department of Ecology*
> *425.649.7135*
> ptom461@ecy.wa.gov

The document titled "What does it mean to be on Ecology's List of "Contaminated" Sites?", located at https://www.ofm.wa.gov/sites/default/files/public/legacy/resources/yearend/What_does_it_mean_to_be_on_Ecologys_list.pdf states in the final paragraph:

> Under state cleanup law, a "site" is the area of contamination. A site may include multiple property owners.

e. On page 3-421, in the paragraph **Economies of Scale**, it gives an example of "growth will not trigger the need to hire another City Manager, Finance Director, ..." It fails to acknowledge that the compensation package for such executives will be expected to be higher when they manage a larger city. 122-6

f. At the top of page 3-427, the DEIS states that public service costs are assumed to be the same for both development alternatives, because the scale of development is similar. At least one specific difference should be accounted for: The outdoor performance space in the Redevelopment Alternative will require unusually large amounts of police services, as well as potentially other infrastructure and services. 122-7

g. Section 3.16 **Fiscal and Economic Impacts** does not take into account the added costs due to damage to the city's existing arterial roadways, either during the construction phase due to construction traffic or on an ongoing basis due to resident and employee traffic. 122-8

h. On page 3-430, under **Capital Needs** it says that the developer would pay for infrastructure improvements such as a new bridge, expanded/reconstructed bridges, etc. Elsewhere in the DEIS it indicates that the expense for such improvements would need to be negotiated 122-9

between the developer and the city. This needs to be absolutely clear. There are significant infrastructure improvements required (especially the bridges), and the cost of these improvements is very high. In addition, the ongoing maintenance costs of the improvements will be borne by the city, and maintenance of things like bridges can become expensive as the structure ages. 122-9

i. The modelling in section 3.16 **Fiscal and Economic Impacts** assumes the developer's current concept of a heavy emphasis on wine related businesses. There are numerous other major wine centers in the region. The analysis needs to also examine how the results change if it turns out that wine related businesses do not take hold and other types of businesses must be sought. The analysis also needs to consider the effects of significantly less successful occupancy of the new development. Business plans are notorious for being wildly optimistic. 122-10

j. Section 3.16 **Fiscal and Economic Impacts** needs to look at the negative effect of new business space opening up when Snoqualmie's current business space already has many vacancies. Also, new restaurants and other businesses in the Mill area will most likely take customers away from existing businesses in Snoqualmie. 122-11

k. The physical distance and limit access via bridges of the new development from existing Snoqualmie businesses means that very few visitors to the Mill area will also become customers of businesses in other parts of the city. 122-12

l. Section 3.16 **Fiscal and Economic Impacts** highlights new economic activity, but does not address the decrease in economic activity in the rest of the city. 122-13

m. The **Employment** topic starting on page 3-437 fails to address the negative impact of the type of jobs this development will bring. Many of the jobs will be lower-paying jobs, which cannot typically afford to live in Snoqualmie. That means that even more people from other areas will commute in and out of the city, rather than the idealistic image of people living and working within the Mill area. At the same time, the housing in the new development is planned to be market rate, so the people living there will mostly commute to jobs in Seattle, Bellevue, and Redmond. This adds to infrastructure costs and increasing traffic congestion. 122-14

n. In the overall summary of section 3.16 **Fiscal and Economic Impacts** highlights, the analysis needs to look at the full spectrum of all the acknowledged unknowns. The city, in considering the proposal, needs to decide whether the worst-case outcome is acceptable (not just a most-likely outcome). 122-15

In addition to my own comments above, I hereby include, by reference:

- The letter from King County Permitting Division, Department of Local Services to Mark Hofman, submitted 7/10/2020 (but erroneously dated 7/13/2020 in the body of the letter)
- The letter from King County Department of Natural Resources and Parks, Historic Preservation Program to Mark Hofman, dated 7/9/2020
- Expert consultant's reports submitted by SCAN to Mark Hofman on 7/10/2020:
    - DN Traffic Consultants report dated 7/3/2020
    - Cooke Scientific report dated 7/9/2020
    - Practical Environmental Solutions report dated 7/10/2020
- The letter from Bricklin & Newman LLP to Mark Hofman on behalf of SCAN dated 7/10/2020

122-16

I also include by reference letters from the Department of Ecology Toxics Cleanup Program, Wetlands and Shorelands Program, and Water Quality Program, all sent to Mark Hofman on or around July 10th, 2020, which our organization has been assured exist by SCAN's consultant Sarah Cooke, but which I have not seen.

Sincerely,
Richard Scheel

Dick Scheel
7-20-2020

Letter No. 123

These public comments are for the Snoqualmie Mill PCI Plan DEIS, and all have a relationship with the proposal's DEIS.

Water Plan

DEIS (page 3-397) refers to the water system capacity analysis for the Mill Planning Area is based on the *2013 Water Plan*, and a 2016 Water System Capacity Analysis Update for the Mill Planning Area which is not with the DEIS documents on the city's website.

The 2013 Water Plan is essential in considering this development. Without an existing, current water plan, the city cannot make reasonable decisions based on solid review by the DOH and the DOE. If this project moves forward without a current water plan certified by these agencies, we lose the benefit of their expertise and could make significant errors.

The 2013 Water Plan is the most recent DOH approved plan, that has the following concerns –

1) is overdue for update

The deadline to update the 2013 Water Plan was October 9, 2019 (2013 Water Plan, page 2).

2) DOH has not received a draft of an update yet, as of June 2020

According to Brietta Carter, MSE, PE, Regional Engineer, Office of Drinking Water, Environmental Public Health, Washington State Department of Health, Brietta.Carter@doh.wa.gov, 253-395-6770, www.doh.wa.gov.

123-1

3) DOH update approval could take a year from the time DOH first receives it

The 2013 Water Plan took over a year for approval between the first time it was submitted to the DOH and when DOH approved it (2013 Water Plan, page 2) , *so an approved updated plan could potentially be two years late.*

4) 2013 Water Plan should not have been approved because there was no consumer input process (WAC 246-290-100(8)(a)).

DOH comment: "The water system must meet the consumer input process outlined in WAC 246-290-100(8)(a). Please include documentation of a consumer meeting discussing the WSP, prior to DOH approval of the WSP."

City Response: "The City Council met on January 14, 2013, to adopt the Water System Plan. Meeting minutes documenting this approval have been added to Appendix A" *See 2013 Water Plan, page 629, Comment 21.*

The response does not mention consumer input, it refers to Appendix A which begins on page 217 of the 2013 Water Plan, Appendix A does not mention consumer input.

The 2013 Water Plan concerning the Mill Site.

1) The water source for the fire protection system that supplies fire hydrants and sprinkler systems in the *mill site buildings* is supplied from a 1,250 gpm pump station, which draws from the *long pond*. Weyerhaeuser has relinquished the water rights back into the State Trust. Where is the water for fire protection coming from for the mill site now? Can you identify where this is accounted for? 2013 Water Plan, Page 39.

2) "It is projected that *demands will surpass instantaneous source capacity in 2023.*" 2013 Water Plan, Page 153

3) Reservoirs missing inspection and certificates of completion

DOH: "18. Please explain why a *comprehensive inspection for the [old] 705 Reservoir has never been conducted* as stated on Page 7-16?" 2013 Water Plan, Page 621.

"The [old] 705 Reservoir is visually inspected when staff visits the 1040 Booster Station, *though a comprehensive inspection has never been completed, due to lack of resources.*" 2013 Water Plan, Page 172

Since the 2013 Water Plan, there's concern about a new reservoir (130,000 gallon) completed in 2019 built near the old 705 reservoir (25,000 gallon). During the November 27, 2019 city council meeting a question was raised about whether the completed new reservoir had a *certificate of completion*; the public works engineer said he didn't know if it was required. 123-1

In December 2019 the DOH confirmed that a certificate of completion is required for the new 705 reservoir. In June 2020 DOH had *NOT* received a certificate of completion for the reservoir which was due 60 days after completion, it was now more than six months after the completion of the new reservoir. DOH sent an email to the public works department in June 2020.

The 2013 Water Plan details the significance of certifying that reservoirs are completed in a way that will prevent contamination. 2013 Water Plan, page 171

Given that the old 705 reservoir could not be certified because of budget constraints, the added new 705 reservoir that is much larger, what caused the certificate of completion to not be provided within 60 days? Was the old 705 reservoir ever certified?

See Appendix AB19-149, Appendix Construction Completion Report Question December 24, 2019, Appendix Construction Completion Report Question June 19, 2020, Appendix Snoqualmie Water (ID# 81080), 2013 Water Plan, Page 4: *"In accordance with WAC 246-290-120 (5), a Construction Completion Report is required for all approved construction projects. Operators must submit a*

Construction Completion Report to us within sixty (60) days of completion and before use of any water system facility. This includes any source, water quality treatment, storage tanks, booster pump facilities, and distribution projects."

4) Wellfield potential contamination sources from the mill site (and pond). 2013 Water Plan, pages 146, 147.

TABLE 6-1

North Wellfield Potential Contaminant Sources

Address	Potential Contaminant Source (1)	Name of Business	Figure 6-2 Identifier
6-Month Zone of Contribution			
None			
1-Year Zone of Contribution			
None			
5-Year Zone of Contribution			
38800 SE Millpond Road/ 7001 396th Drive SE	LUST	Weyerhaeuser Mill/ Dirtfish Rally School	A
38800 SE Millpond Road/ 7001 396th Drive SE	UST	Weyerhaeuser Mill/ Dirtfish Rally School	A
38800 SE Millpond Road/ 7001 396th Drive SE	CSCS	Weyerhaeuser Mill/ Dirtfish Rally School	A
10-Year Zone of Contribution			
8352 Meadowbrook Way SE	RCRA	Alpine Coachworks	B
8651 Meadowbrook Way SE	RCRA	Mt. Si High School	C
SR 202 and Meadowbrook Way	LUST	WSDOT Snoqualmie	D
SR 202 and Meadowbrook Way	UST	WSDOT Snoqualmie	D

(1) UST = Underground Storage Tank, LUST = Leaking Underground Storage Tank, RCRA = Dangerous Waste and Materials Generators which are regulated by Ecology under RCRA, and CSCS = Confirmed or Suspected Contaminated Sites.

(2) Sources: See page 6-11 of this document.

123-1

TABLE 6-2

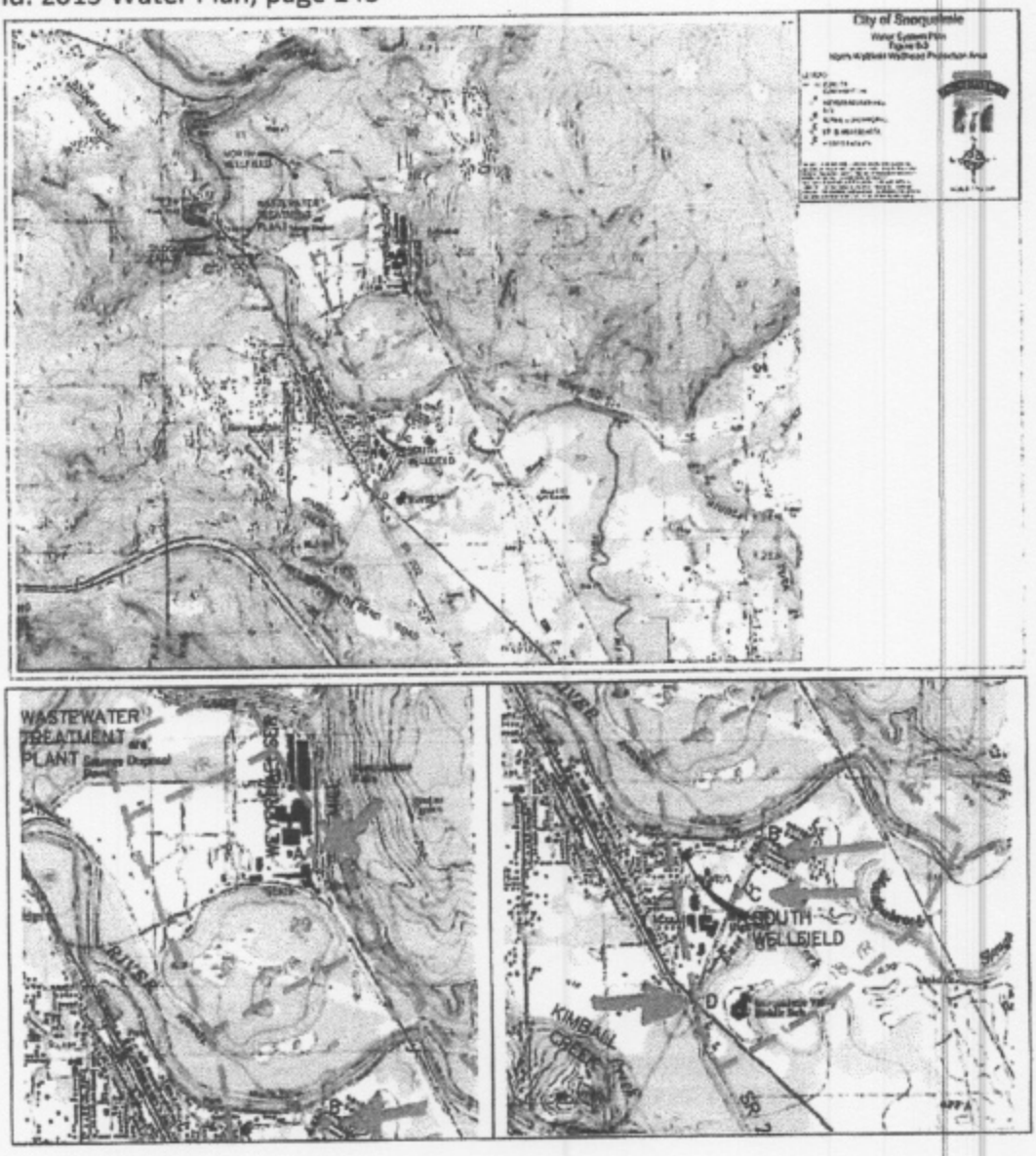
South Wellfield Potential Contaminant Sources

Address	Potential Contaminant Source	Name of Business	Figure 6-3 Identifier
6-Month Zone of Contribution			
None			
1-Year Zone of Contribution			
8651 Meadowbrook Way SE	RCRA	Mt. Si High School	A
5-Year Zone of Contribution			
8352 Meadowbrook Way SE	RCRA	Alpine Coachworks	B
8250 Railroad Avenue SE	1 LUST	76 Station	C
8250 Railroad Avenue SE	4 USTs	76 Station	C
10-Year Zone of Contribution			
9575 Ethan Wade Way SE	4 USTs	Snoqualmie Valley Hospital	D
8001 SE Silva Avenue	LUST	Snoqualmie Valley School District	E
8001 SE Silva Avenue	UST	Snoqualmie Valley School District	E

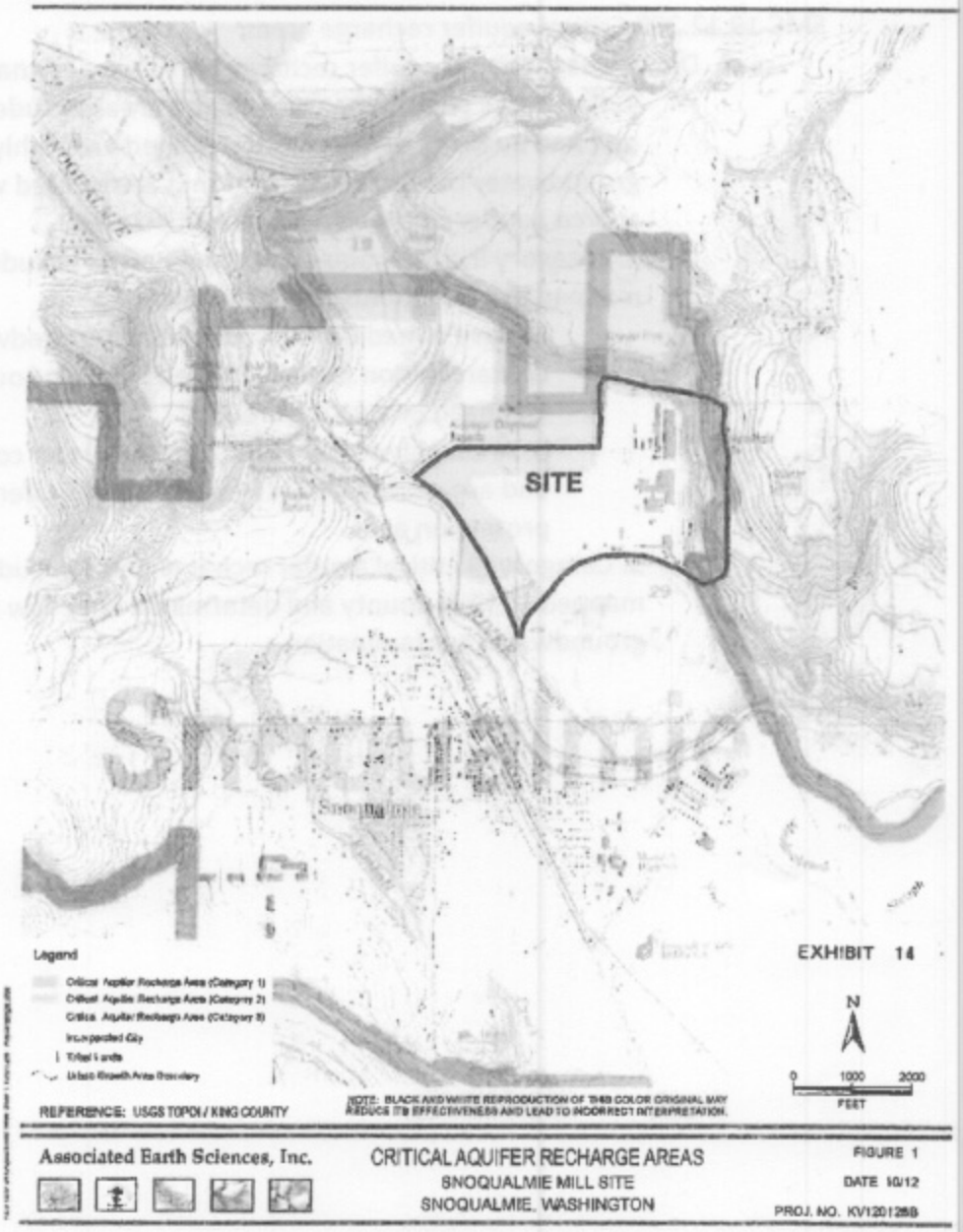
(1) UST = Underground Storage Tank, LUST = Leaking Underground Storage Tank, RCRA = Dangerous Waste and Materials Generators which are regulated by Ecology under RCRA, and CSCS = Confirmed or Suspected Contaminated Sites.

(2) Sources: See page 6-11 of this document.

5) North and South Wellfield contamination timeline, at 5 years it crosses the mill site and pond. 2013 Water Plan, page 143



6) The yellow in the map below is critical aquifer recharge area category 1 (mill site), pink is category 2 (mill pond).
Sensitive Areas Report, page 55.



123-1

"Critical aquifer recharge area" means the recharge areas of aquifers which serve as a source of drinking water for which there is no feasible alternative source and which, due to prevailing geologic conditions characterized by high infiltration rates, are susceptible to contamination from activities on the surface.
Sensitive Areas Report, page 84

https://www.codepublishing.com/WA/Snoqualmie/html/Snoqualmie19/Snoqualmie1912.html#19.12.110

SMC 19.12.200 Critical aquifer recharge areas.

A. Designation. Critical aquifer recharge areas are designated as follows:

1. Category I critical aquifer recharge areas include those areas mapped by King County and determined are highly susceptible to groundwater contamination and that are located within a sole source aquifer or a wellhead protection area.

2. Category II critical aquifer recharge areas include those areas mapped by King County and determined: 123-1

a. Have a medium susceptibility to groundwater contamination and are located in a sole source aquifer or a wellhead protection area; or

b. Are highly susceptible to groundwater contamination and are not located in a sole source aquifer or wellhead protection area.

3. Category III critical aquifer recharge areas include those areas mapped by King County and determined have low susceptibility to groundwater contamination.

Superfund

The mill site was not accurately assessed to determine whether it was a superfund site.

The city's website provids an FAQ document regarding whether the mill site was a superfund site:

> "I have heard that the Snoqualmie Mill is a "Superfund" site. Is that true, and what does that mean?
>
> > The Snoqualmie Mill site was assessed by the United States Environmental protection Agency (EPA) during Weyerhaeuser's clean-up activities in the 1990's, and was determined not to qualify as a Superfund site."
> > https://www.snoqualmiewa.gov/DocumentCenter/View/16303/FAQ-Mill-Planning-PCI-Plan-EIS-2017-12-19-PDF?bidId=

However, the EPA superfund website only has one site for Snoqualmie, which has the wrong address for the currently proposed development. The EPA shows 7001 396th Ave SE for Weyerhaeuser Co Plywood, and no other sites for Snoqualmie, less than 16 acres, owned by King County and not the developer. 123-2

For 7001 396th Ave SE - 16 acre parcel, the HRS (Hazard Ranking Score) from 1991 made the following assumptions when determining that no further remedial action planned (NFRAP) under the Federal Superfund program:

- A population of 775 use groundwater for domestic purposes within a four-mile radius of the site. *The current use of ground water includes Snoqualmie water service customers, closer to 15,000.*
- The distance to the log pond is 100 feet and to the Snoqualmie river is 2,000 feet. *Snoqualmie river Is less than 200 feet from the mill site.*
- Two drinking water intakes are located roughly 3 miles downstream of the site. *"Various commercial and governmental activities lie along the boundaries of the 5 and 10-year zones of contribution for the City's North Wellfield. These activities include the former mill site, now a rally car driving facility, and storage and maintenance facilities for the Puget Sound Historical Railroad and WSDOT Road Maintenance facilities. Various chemical storage and industrial processes take place at these locations, which may contribute contaminants that may enter the ground and affect the groundwater the City uses for its water supply." Source: Gray & Osborne, Inc., Consulting Engineers City of Snoqualmie, Water System Plan February 2013*

- There are no workers or residents on site *the site has a lot of activity from Dirtfish race cars, the city uses it for parking, trucks drive over it, events are held on the site such as a drive-in movie.*
- A population of 1,410 people are located within a one-mile radius of the site. *A lot of homes have been built since this time, and residences are planned with this proposed development.*

See Appendix EPA Superfund Site Information.

Recently (June 25, 2020) another, much smaller Weyerhaeuser mill site (<9 acre site) in Everett, WA, is being required to do more testing by the Washington State EPA after extensive development on the site to determine if arsenic is reaching the Snohomish River, over 20 years after an initial cleanup, the state isn't sure arsenic is contained. The Snoqualmie Weyerhaeuser mill site (~500 acre site for the entire mill operation) is ~50 times larger than the Everett mill site. 123-2

https://www.heraldnet.com/news/is-pollution-at-old-mill-site-reaching-the-snohomish-river/

https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=2903

Annual Contaminant Usage

*Chlorine – 2,400 lbs
*Hydrogen peroxide – 12,000 lbs
*Phenolic or urea resins (for adhesives) – 3,900,000 lbs (contains 1-2% formaldehyde)
Engine degreaser – 200 gallons (contains 35% aromatic hydrocarbons trichloroethane)
WD-40 – 1,400 lbs (contains 70% Stoddard solvent)
Methanol – 300 gallons
Safety Kleen – 10,000 lbs (mineral spirits)
Gasoline
    Leaded – 60,500 gallons
    Unleaded – 43,400 gallons
Diesel – 466,500 gallons

123-2

*Extremely hazardous materials, reportable under *Title III Emergency Planning*.
See Appendix Mill Annual Contaminant Usage
The *Emergency Planning* and Community Right-to-Know Act (EPCRA), also known as *Title III* of the Superfund Amendments and Reauthorization Act (SARA), requires states and local governments to establish local chemical emergency preparedness programs for their communities.

https://www.epa.gov/enforcement/emergency-planning-and-community-right-know-act-epcra-and-federal-facilities#:~:text=The%20Emergency%20Planning%20and%20Community,preparedness%20programs%20for%20their%20communities.

Comprehensive-Plan – Mill Site

The Mill planning area in the map below includes the Mill Pond, also known as Borst Lake

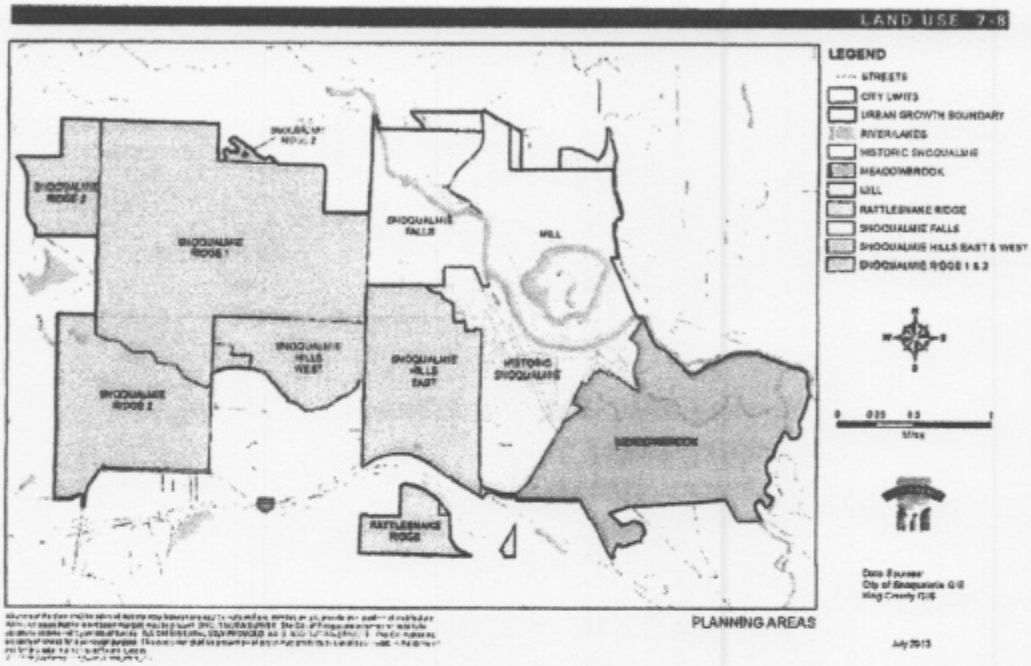


Figure 7.2 Planning Areas

123-3

Mill Site Berm & Fill To protect the former mill site, Weyerhaeuser constructed a berm along Mill Pond Road with fill later added behind the berm, some without the proper permits; about 93,900 cubic yards of fill were added to the floodplain. The King County Flood Hazard Reduction Plan identified the berm as a hazard that displaced floodwater, potentially impacting conveyance & storage capacity. Weyerhaeuser was issued a permit in 2006 by King County to remove about 49,000 cubic yards of the fill; the berm was breached and most of it removed. The City pursued an action against the County to compel removal of remaining fill. The County prevailed. ***The Mill property pre-annexation agreement requires removal of floodplain fill as part of future development***.

Department of Ecology records show the former lumber mill site is awaiting a Site Hazard Assessment; a "no further action" letter from DOE was ***NOT*** obtained for the site, reportedly due to legal costs. Overall, the site is a brownfield or, "an abandoned, idle or under-used real property." Such designation means the site may qualify for various brownfield grants

123-4

https://www.ci.snoqualmie.wa.us/DocumentCenter/View/1384/Comprehensive-Plan-Adopted-2014-Element-7-Land-Use-PDF



Mill Site

Developments in this area should incorporate the following:

Streets, Sidewalks & Trails

- Improve vehicle access to the site to serve the projected traffic volumes of proposed developments.
- Develop connections to Snoqualmie River Walk and the regional SVT Trail.

Other

- Ensure environmental cleanup sufficient for intended development uses.
- Encourage assessment of the Mill Pond waters and development of public access as appropriate.
- Protect and, as funding allows, provide support for the rehabilitation and adaptive reuse of the old powerhouse building.

123-4

In August of 2012 the city council adopted Ordinance 1098, annexing 593 acres in the Mill Planning Area.

Note that the comprehensive plan states: "Developments in this area should incorporate the following: … *Ensure environmental cleanup sufficient for intended development uses … Encourage assessment of the Mill Pond waters*"

https://www.ci.snoqualmie.wa.us/DocumentCenter/View/1382/Comprehensive-Plan-Adopted-2014-Element-5-Community-Character-PDF

"An effort should be made to encourage the industry to inform their employees who have *potential contact with the long pond waters of the health hazard which exists.*"
The log pond or Borst Lake was identified as a health hazard in 1973. Page 7

BACKGROUND:

In terms of industrial waste water disposal, the Weyerhaeuser Mill at Snoqualmie, until now, has been all but ignored by this Department. The process effluents have not been adequately analyzed nor has the treatment system been evaluated.

The operation consists of a saw mill and power house, a plywood mill, a hydraulic barker and a wood fiber processing operation. The power house has a thermal discharge at times, a blow down discharge and small quantities of bearing water. The saw mill discharges saw guide water and cooling water. The plywood operation has phenolitic glue wastes associated with it along with dryer condensate, log conditioning discharges, and small amounts of cooling water. The most significant discharge is associated with the hydraulic barker, the discharge being treated by means of a settling ditch. The "sylvacel" or wood fiber plant produces small quantities of cooling water. In addition to these effluents, a discharge occurs from the log washer and oil problems are associated with a number of the processes.

123-4

"The industrial waste water disposal, the Weyerhaeuser Mill at Snoqualmie, until now, has been all but ignored by this Departmnet." Page 13.

https://fortress.wa.gov/ecy/publications/documents/73e57.pdf

Instantaneous Water

Mill Planning Area Post Annexation Implementation Plan

CONCLUSION

The City has adequate annual water rights to provide all allocated water. However, the City currently lacks developed instantaneous water rights and source capacity to serve all customers to whom water has already been allocated. If the two groundwater claims are considered, the City has adequate instantaneous water rights to serve the allocated water and approximately 290 additional ERUs.

123-1

https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=79463

The 2013 Water Plan also predicted a shortage of instantaneous water.

"It is projected that *demands will surpass instantaneous source capacity in 2023.*" Page 153

Transition private irrigation customers to potable water supply

In the NPDES permit, the city has changed the use of reclaimed water. How is that impacting available water?

Fact Sheet for NPDES Permit WA0022403

City of Snoqualmie Water Reclamation Facility

WA0022403_DraftFS_20200109_Snoqualmie DRAFT Department of Ecology_L Eleuterio

City's Comment # 19: Page 13 - First paragraph, last sentence under Reclaimed Water Distribution and Use Area. Revise last sentence to read: "The City uses divides its allocation and the City's municipal irrigation system to serve among various City and commercial municipal irrigation customers in an 85-acre area in Snoqualmie Ridge I." 123-5

Ecology's Response: The current permit does not authorize the City to provide reclaimed water to private customers (City of Snoqualmie; City of Snoqualmie Storm; Bandera; Snoqualmie Residential Owners Association; Snoqualmie Ridge Business Park Owners Association; and the Snoqualmie Ridge Joint Commission). Per letter from the City to Ecology on August 1, 2019, the City decided to transition its private irrigation customers to potable water supply. If the City aims to provide reclaimed water for these customers in the future, the City must submit a plan detailing how the reclaimed water produced at the facility will be conveyed to the users without being deteriorated with stormwater or any water of lower quality. After review and approval of the plan by the Department of Ecology and DOH, the City must also submit an engineering report followed by design documents (drawings and construction specifications) per WAC 173-240.

https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?Id=297717

Letter 123
Attachments

Appendix Construction Completion Report Question December 24, 2020

RE: Construction Completion Report Question

You forwarded this message on Fri 6/19/2020 4:54 PM

Carter, Brietta J (DOH) <brietta.carter@doh.wa.gov>
Tue 12/24/2019 11:44 AM
To: Peggy Shepard

WARNING: The sender of this email could not be validated and may not match the person in the **"From"** field.

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

HI Peggy,

I hope the City fared well with last week's atmospheric river.

The stormwater project is not related to what we do here at the Office of Drinking Water. That would be Ecology's purview.

For the reservoir project, we do expect to see a signed/dated construction completion report within 60 days of completion of work.

Sincerely,

Brietta Carter, MSE, PE
Regional Engineer
Office of Drinking Water
Environmental Public Health
Washington State Department of Health
Brietta.Carter@doh.wa.gov
253-395-6770 | www.doh.wa.gov

Appendix Construction Completion Report Question June 19, 2020

Snoqualmie Water #81080 New 705 Reservoir 17-0413 - CCR

You forwarded this message on Fri 6/19/2020 5:17 PM

Carter, Brietta J (DOH) <brietta.carter@doh.wa.gov>
Fri 6/19/2020 5:17 PM
To: tsaxberg@snoqualmiewa.gov
Cc: Peggy Shepard; Russ Porter <rporter@g-o.com>

Snoqualmie Water #81080 N...
876 KB

WARNING: The sender of this email could not be validated and may not match the person in the **"From"** field.

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe

Hi Todd,

Councilwoman Peggy Shepard is asking me about the construction completion report form for the new 705 reservoir project. Any chance this is on its way? I'm happy to discuss.

I hope this message finds you and your family in good health.

Best,

Brietta Carter, MSE, PE
Regional Engineer
Office of Drinking Water
Environmental Public Health
Washington State Department of Health
Brietta.Carter@doh.wa.gov
253-395-6770 | www.doh.wa.gov

Definitions

2013 Water Plan City of Snoqualmie, WA Water System Plan G&O #10520 February 2013 by Gray and Osborne (DOH approved October 9, 2013). This document is not included in the DEIS set of documents. https://www.ci.snoqualmie.wa.us/DocumentCenter/View/16457/Snoqualmie-Water-System-Plan_02-2013-PDF

DOH Department of Health

DEIS Snoqualmie Mill PCI Plan Draft Environmental Impact Statement City of Snoqualmie, April 2020 Document

HRS Score The Hazard Ranking System. Used by the EPA (Superfund) to determine whether to put sites on the National Priorities List (NPL). https://www.epa.gov/superfund/introduction-hazard-ranking-system-hrs

Sensitive Areas Report Mill Planning Area Sensitive Area Study by Goldsmith Land Development Services https://www.snoqualmiewa.gov/DocumentCenter/View/1429/Sensitive-Areas-Report---Revised-Ratings-PDF

Appendix AB19-149

Brian Coleman, Project Engineer
38624 SE River ST
Snoqualmie, WA 98065

Office: 425-888-1555
Fax: 425-831-6121

Council Agenda Staff Report for AB19-149

TO: Snoqualmie City Council
Parks and Public Works Committee

FROM: Brian Coleman, Project Engineer Wednesday, November 27, 2019

DATE: AB19-149 - Approve Resolution 1528 accepting water reservoir improvements project as complete.

SUBJECT:

BACKGROUND

On December 11, 2017, the City of Snoqualmie awarded a public works contract to CBI Services, LLC for the Water Reservoir

Improvements Project per Resolution 1425. This project involved constructing a new welded steel reservoir at the site of the existing 705 reservoir on a previously cleared and graded site at Fisher Creek Park and modifications and recoating of the existing 705 and 1172 reservoirs. The project included site work, reservoir foundation and structure, reservoir accessories, painting, electrical systems, and site piping for water mains, and overflow piping.

ANALYSIS

The Water Reservoir Improvements Project work is been completed per the contract and specifications.

RECOMMENDATION

Staff recommends the City Council approve Resolution 1528 accepting the Water Reservoir Improvements Project as fully complete, subject to applicable warranties, and directs Staff to send in for required Land I and Revenue releases.

BUDGET

This project was part of the 2017-2022 Utilities Capital Improvement Plan (See Attached CIP Project Submission Form). In the 2017-18 Adopted Budget, appropriations were made for this project in the 2017 Revenue Bond Construction Fund (#417). The contract with CB and I Services was for $1,028,000 plus 8.6% tax for a total of $1,116,951. Total amount to complete the work was $1,101,527.22.

Appendix Snoqualmie Water (ID# 81080)

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
NORTHWEST DRINKING WATER REGIONAL OPERATIONS
20425 72nd Avenue South, Suite 310, Kent Washington 98032-2388

September 20, 2017

NANCY DAVIDSON
OPERATIONS MANAGER
SNOQUALMIE WATER
PO BOX 987
SNOQUALMIE WA 98065

Subject: Snoqualmie Water (ID# 81080)
King County
New 705 Reservoir - Approval
Submittal #17-0413

Dear Nancy Davidson:

Thank you for submitting engineering documents for the proposed 705 Reservoir project. The documents were prepared by your engineer, Russ Porter, PE and received in our office on April 25, 2017 with amendments received on September 19, 2017.

The project report and construction documents for the above project, were reviewed and, in accordance with the provisions of WAC 246-290 are hereby **APPROVED**. The approval issued herein is only valid as it relates to current standards outlined in WAC 246-290, effective January 14, 2017. Future revisions in the rules may be more stringent and require facility modifications or corrective action.

Design Summary:
Schedule A: New 130,000-gallon reservoir at the 705 reservoir and 1040 booster station site. The existing 25,000-gallon 705 reservoir storage volume only provides equalizing storage. New tank to 1) reduced pump cycling at both the 1040 booster station and Well 8, and 2) provide redundancy to allow for maintenance activities for the existing reservoir. The 130,000-gallon reservoir will operate on the same hydraulic grade line as the existing 705 reservoir. Schedule B: Modify and recoat existing 705 and 1172 reservoirs.

As required in WAC 246-290-120(5) within sixty days following the completion of and prior to the use of the above project or portions thereof, the enclosed construction report must be completed by a professional engineer and returned to this department. In addition, complete and submit the enclosed Pressure, Leakage, and Bacteriological Test Report form for applicable portions of this project.

Regulations establishing a schedule of fees for review of planning, engineering and construction documents have been adopted (WAC 246-290-990). An itemized invoice for $1,984.00 is enclosed. Please remit your complete payment in the form of a check or money order within thirty days of the date of this letter in the enclosed envelope or send payment to: **DOH, Revenue Section, PO Box 1099, Olympia WA 99507-1099.**

WAC 246-290-120(8) provides that if construction of the project has not been started within two years of the date of this letter, this approval will become null and void unless you take action at that time to arrange for an extension of the approval in the manner prescribed.

Nothing in this approval shall be construed as satisfying other applicable federal, state, or local statutes, ordinances and regulations.

Sincerely,

Brietta Carter

Brietta Carter, PE
Regional Engineer
NW Office of Drinking Water

Enclosures

cc: Public Health – Seattle & King County
Russell Porter, PE, Gray & Osborne, Inc.

Washington State Department of Health

Office of Drinking Water
INVOICE
Engineering, Planning, and Sanitary Survey Review Form

TO: DUSTIN POSSERT
SNOQUALMIE WATER
PO BOX 987
SNOQUALMIE WA 98065

Invoice Number	N02772
Invoice Date	September 22, 2017
Billing Period	30 days NW

DATE	DESCRIPTION	QTY	COST	AMOUNT
9/22/2017	REVIEW AND/OR APPROVAL OF PROJECT REPORT SNOQUALMIE WATER KING COUNTY NEW 705 RESERVOIR SUBMITTAL #: 17-0413	1	1	$1984.00
	Total			**$1,984.00**
	Payment due within 30 days. Interest shall accrue at 1% per month after 30 days.			

Make Checks Payable to Department of Health
Return Lower Portion to:
Department of Health
PO Box 1099
Olympia, WA 98507-1099

Office of Drinking Water
Engineering, Planning, and Sanitary Survey Review Form

Name	SNOQUALMIE WATER
Invoice Number	N02772
Invoice Date	9/22/2017 17-0413 NW
Amount	$1,984.00

DOH Form #331-332

Return to:
Department of Health
Revenue Section
PO Box 1099
Olympia, WA 98507-1099

For persons with disabilities, this document is available on request in other formats. To submit a request, please call 1-800-525-0127 (TTY 1-800-833-6388).

2 044129 00878

Appendix Mill Annual Contaminant Usage

https://www.foiaonline.gov/foiaonline/api/request/downloadFile/R10-1335778.pdf/2d1a7ec6-d300-43c0-a4a2-6e6bf04bdf69

WEYERHAEUSER FOREST PRODUCTS
SNOQUALMIE, WASHINGTON
REG No.: 12756
DOE No.: 13
SIC No.: 2421

POTENTIAL AIR CONTAMINANT PRODUCTS USAGE

Common Name	Toxic Component(s)	Toxic,% of Product	Product Annual Use
*Chlorine	Chlorine	100	2,400 lb
*Hydrogen peroxide	Hydrogen peroxide	100	12,000 lb
*Phenolic or urea resins (for adhesive)	Formaldehyde	1-3	3,900,000 lb
Engine degreaser	Aromatic hydrocarbons 1, 1, 1 trichloroethane	35	200 gallons
WD-40	Stoddard solvent	70	1,400 lb
Methanol	Methanol	100	300 gallons
Safety Kleen	Mineral spirits	100	10,000 lb
Gasoline			
. Leaded	Gasoline, Pb	~100	60,500 gallons
. Unleaded	Gasoline	~100	43,400 gallons
Diesel		~100	466,500 gallons

*Extremely hazardous materials, reportable under Title III Emergency Planning.

USEPA SF
1335778

kjw/0701/c65 -3

Appendix HRS Score

https://www.foiaonline.gov/foiaonline/api/request/downloadFile/R10-1335773.pdf/4b8f0e41-1411-4464-b1f9-c85ac780052c

MEMORANDUM

DATE: February 27, 1991

TO: David Bennett, HWD, USEPA, Region 10

THRU: Andrew Hafferty, FITOM, E & E, Seattle

FROM: Amy Houghton, FIT-PM, E & E, Seattle

SUBJ: HRS Score for
Weyerhaeuser Company Site
Snoqualmie, Washington

REF: TDD F10-9010-006
PAN PWA0653PA

CC: John Osborn, ESD-PO, USEPA, Region 10
Dave Bennett, HWD-SM, USEPA, Region 10
Kathy Bahnick, AFITOM, E & E, Seattle
Mark Ader, FIT-PD, E & E, Seattle

A preliminary revised Hazard Ranking System (HRS) score was computed for the Weyerhaeuser Company Plywood Site based on data collected during the Preliminary Assessment. A preliminary HRS score of 1.56 was calculated based on known information and, when necessary, professional assumptions.

Assumptions used to derive the score include the following:

Groundwater:

- An observed release to groundwater was assumed.
- The depth to the aquifer of concern is approximately 15 feet.
- A population of approximately 775 use groundwater for domestic purposes within a four-mile radius of the site.
- The closest domestic well is approximately 1/2 mile from the site.

USEPA SF
1335773

Surface water:

- o An observed release to surface water was assumed due to the groundwater migration and not to the overland/flood migration.
- o The distance to the log pond is approximately 100 feet and to the Snoqualmie River is approximately 2000 feet.
- o Two drinking water intakes are located roughly 3 miles downstream of the site.
- o The flow rate of the Snoqualmie River is 2677 cubic feet per second, with an assumed annual fish production (for 1989) of about 23,000 pounds.
- o Wetland frontage on surface water bodies within 15 miles downstream of the site is estimated at 30 miles.

Soil Exposure:

- o The area of soil contamination is 12 feet under the ground surface and is estimated at 435,600 square feet.
- o There are no workers or residents on-site.
- o The Weyerhaeuser Company Plywood site is located in an isolated industrial area in Snoqualmie, Washington.
- o The nearest residence is located 3/4 of a mile from the site.
- o A population of 1410 people are located within a one-mile radius of the site.

Air Pathway:

- o An observed release to air is not assumed.
- o Because of the location of the contaminant, no gaseous or particulate contamination could occur.
- o Approximately 5,574 people live within a 4-mile radius of the site.

A score of 15.19 was generated when the following assumption was made:

- The Snoqualmie River Fishery was assumed contaminated at Level II concentrations.

Additional information probably will not result in a higher score.

AH:mac

Enclosures

Appendix Superfund Information

Weyerhaeuser Company Snoqualmie Plywood

https://cumulis.epa.gov/supercpad/CurSites/csitinfo.cfm?id=1001389

EPA United States Environmental Protection Agency

Environmental Topics | Laws & Regulations | About EPA | Search EPA.gov

Superfund

You are here: EPA Home » Superfund » Search Sites » Search Results » Superfund Site Information

Superfund Site Information

WEYERHAEUSER COMPANY-SNOQUALMIE PLYWOOD (EPA ID: WAD009270224)

Site Information

Site Info | Aliases | Operable Units | Contaminants | Contacts
Administrative Records | Reports and Documents

Site Name:	WEYERHAEUSER COMPANY-SNOQUALMIE PLYWOOD
Street:	7001 396TH AVE SE
City / State / ZIP:	SNOQUALMIE, WA 98065
NPL Status:	Not on the NPL
Non-NPL Status:	NFRAP-Site does not qualify for the NPL based on existing information
EPA ID:	WAD009270224
EPA Region:	10
County:	KING
Federal Facility Flag:	Not a Federal Facility

Parcel Information

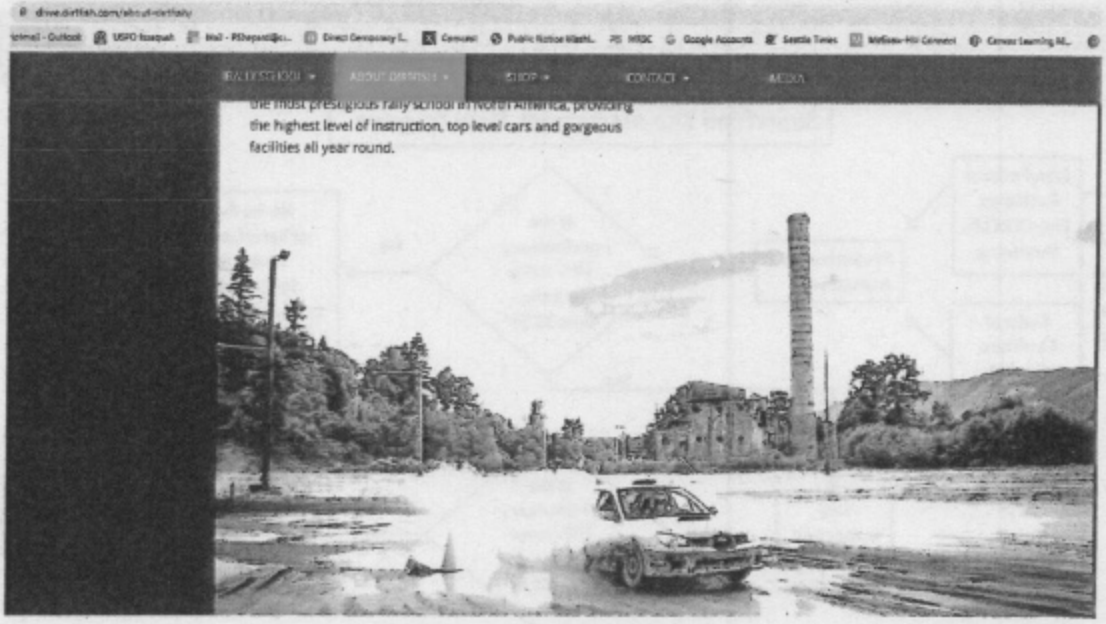
https://blue.kingcounty.com/Assessor/eRealProperty/Dashboard.aspx?ParcelNbr=2924089003

PARCEL	
Parcel Number	292408-9003
Name	KING COUNTY-PARKS
Site Address	7001 396TH DR SE 98065
Legal	LOT B SNOQUALMIE BLA #LLA15-01 REC #20151106900001 SD BLA BEING POR W 1/2 OF NE 1/4 & POR NW 1/4 OF NW 1/4 OF SE 1/4 STR 29-24-08

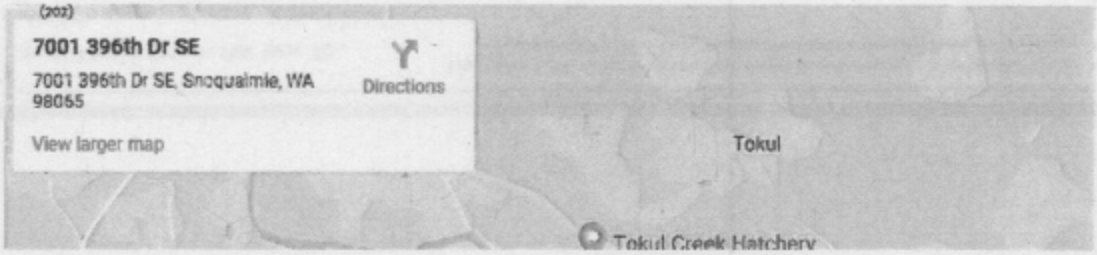
Highest & Best Use As If Vacant	REGIONAL LAND USE
Highest & Best Use As Improved	PRESENT USE
Present Use	Office Building
Land SqFt	681,032
Acres	15.63

Dirtfish

https://drive.dirtfish.com/about-dirtfish/



Interested in DirtFish? Get in touch with us, or stop in and check us out!



FAQ

Mill Plan Reference Documents (2017)

Frequently Asked Questions - Overview (PDF)

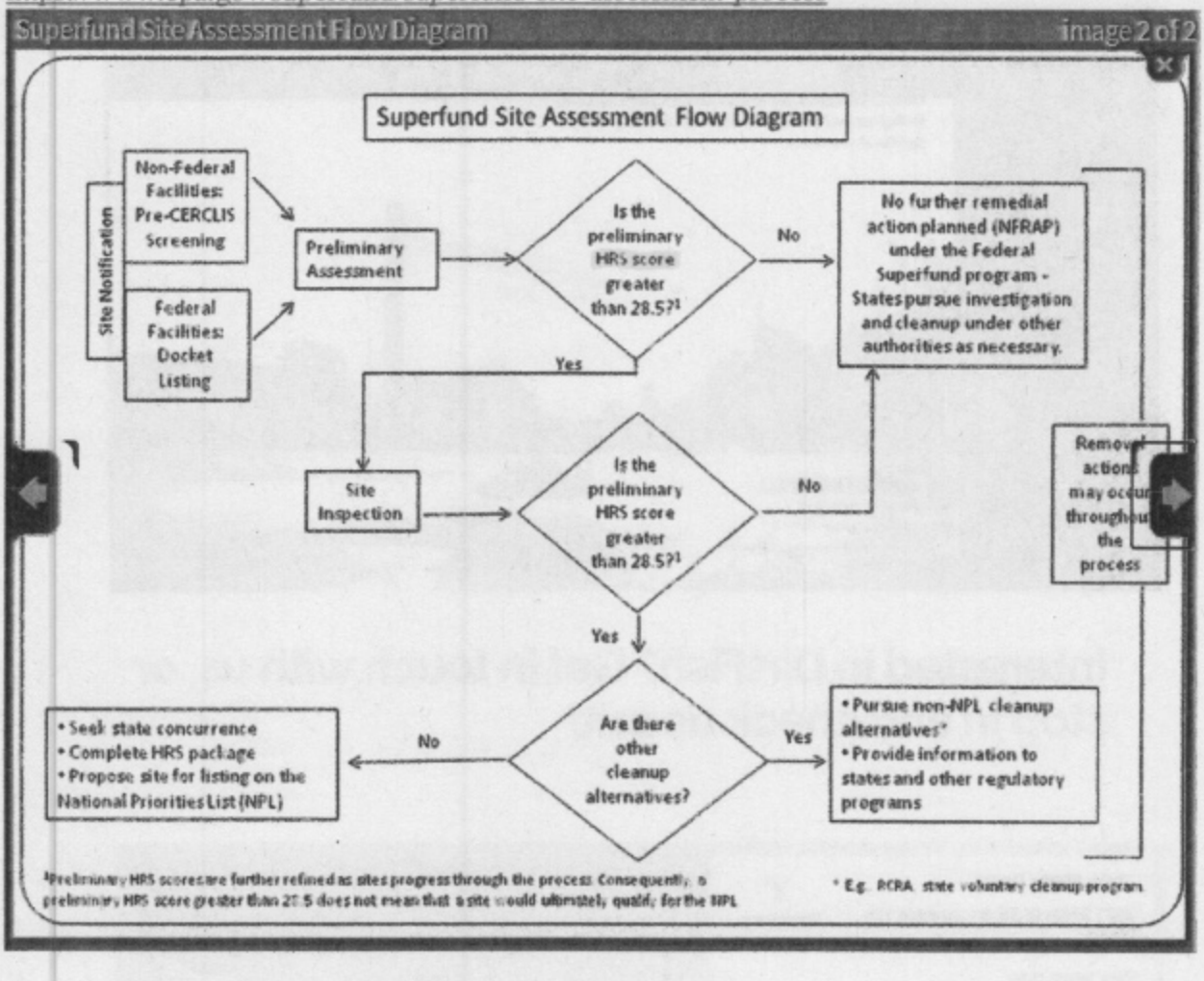
https://www.snoqualmiewa.gov/DocumentCenter/View/16303/FAQ-Mill-Planning-PCI-Plan-EIS-2017-12-19-PDF?bidId=

I have heard that that the Snoqualmie Mill is a "Superfund" site. Is that true, and what does that mean?

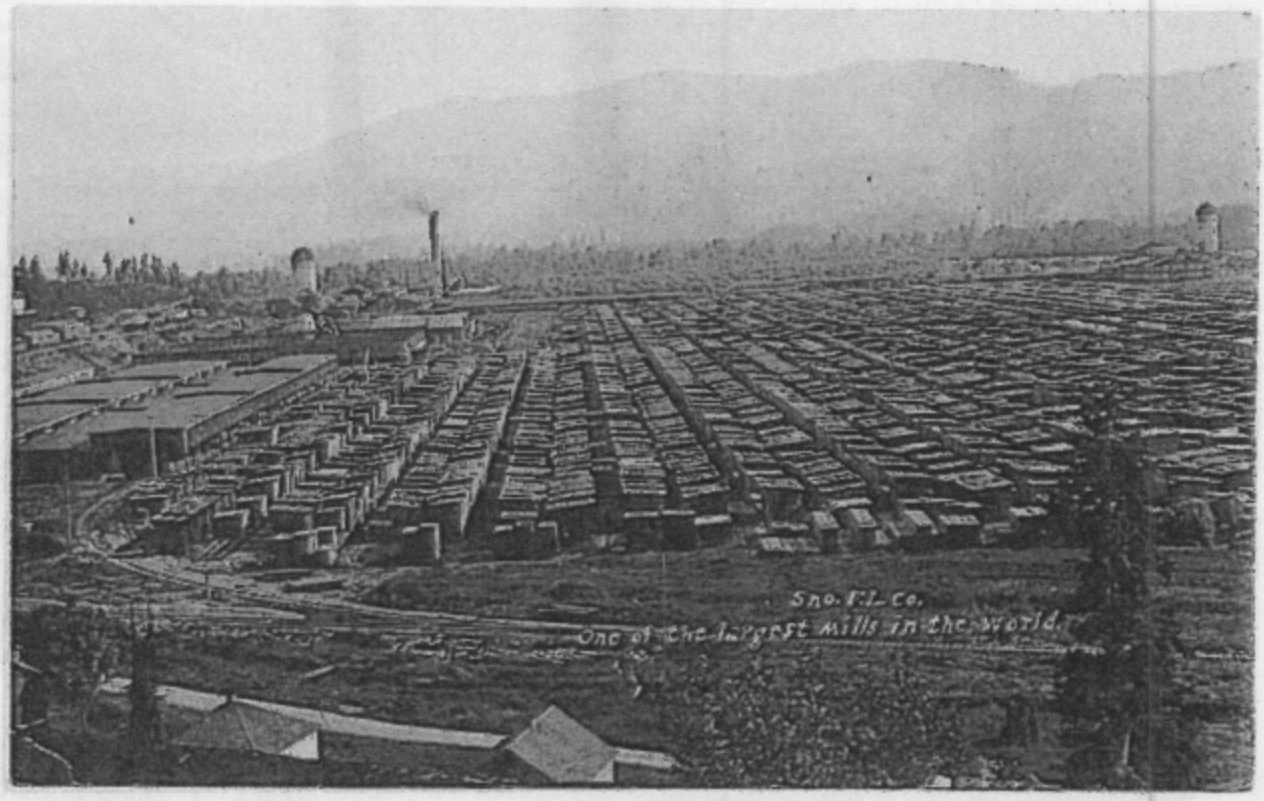
The Snoqualmie Mill site was assessed by the United States Environmental Protection Agency (EPA) during Weyerhaeuser's clean-up activities in the 1990's, and was determined not to qualify as a Superfund site. "Superfund" is shorthand for a federal statutory program, the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA), which is managed by the EPA. The program includes a list of sites (National Priorities List, aka Superfund sites) that typically have extensive

Superfund Site Assessment Flow Diagram

https://www.epa.gov/superfund/superfund-site-assessment-process

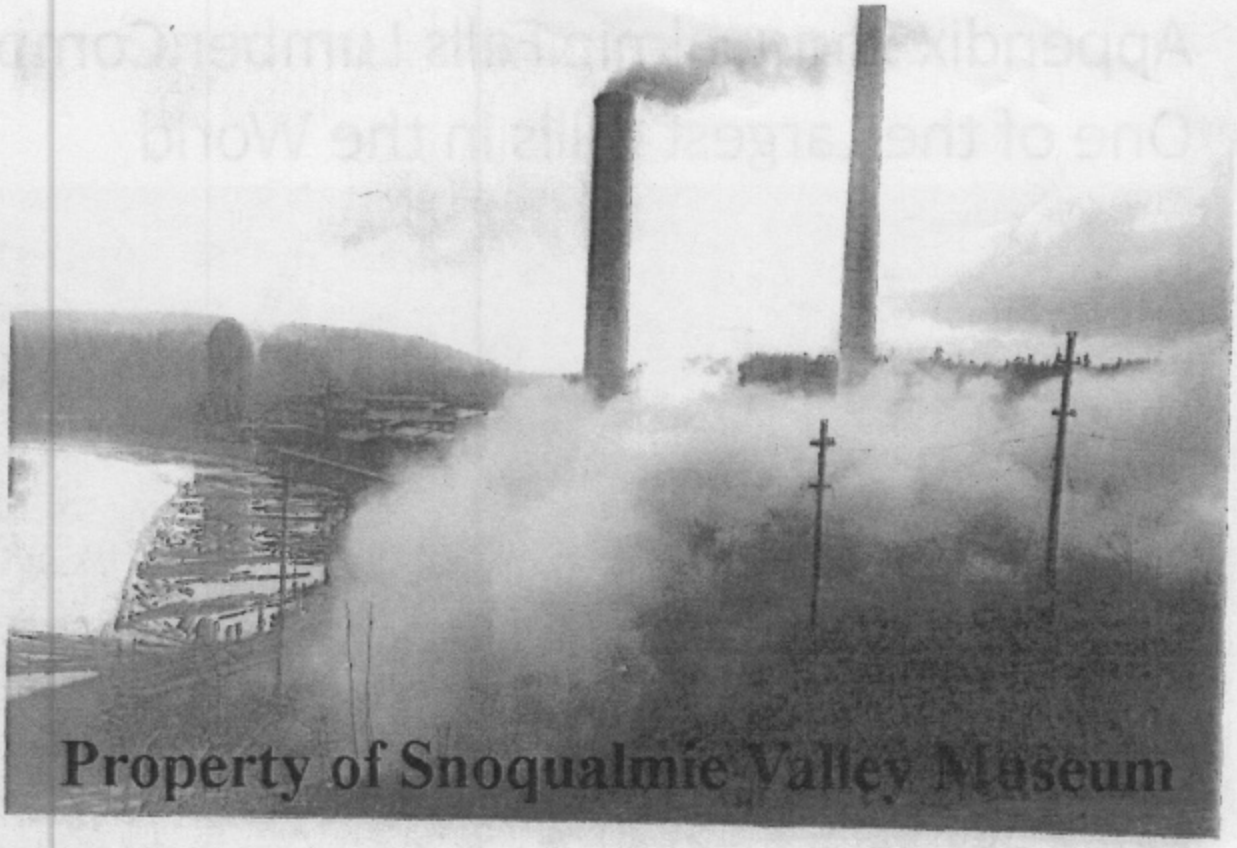


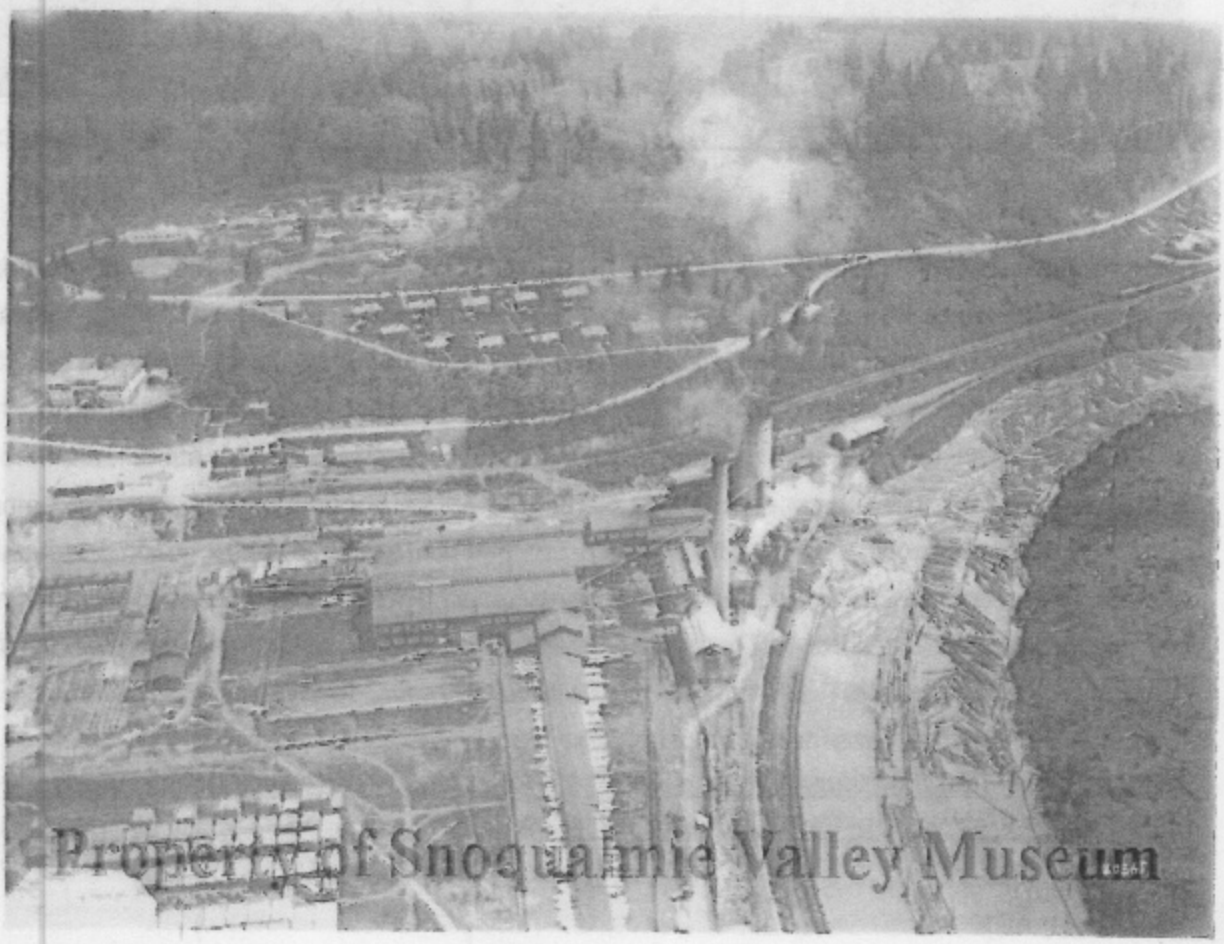
Appendix Snoqualmie Falls Lumber Company One of the Largest Mills in the World



Snoqualmie Falls Lumber Co. Powerhouse And Brick Stack by King County Historic Preservation

The Snoqualmie Falls Lumber Co. Powerhouse and Brick Stack are key surviving components of an innovative, early 20th century milling operation that was the most expansive of its kind ever to operate in King County. The brick powerhouse and 211-foot brick stack functioned as the heart of the all-electric plant. According to the Weyerhaeuser Co., the Snoqualmie Falls Lumber Co. (SFLCo) mill was only the second such all-electric mill operation in the nation, and the first of its kind to employ electrical powered cutting operations in the woods. Today, the mill complex itself has all but disappeared. A large open space remains on the level valley floor previously crowded with buildings and structures containing machinery and operations for log cutting, planing, processing, and lumber sorting. Today the power plant serves as the last tangible symbol of the community of Snoqualmie Falls and its social and economic legacy. The Snoqualmie Falls Lumber Company Powerhouse was designated a King County Landmark in 2005.
https://www.geocaching.com/geocache/GC21MAA_old-snoqualmie-falls-lumber-company-mill?guid=5440fc25-e36b-48a7-8ca5-fe36837ff078


Property of Snoqualmie Valley Museum


Property of Snoqualmie Valley Museum

Kathleen Schneider
July-10-2020

Letter No. 124

Questions / comments

1. Planned Commercial Industrial (PCI) has 3 planning areas / Redevelopment Alternative (RA) also has 3 with performance space in area 3 adjacent to Borst Lake. Since this is a phased review would they be able to request change from PCI to RA after area 1 is completed? 124-1
2. It mentions infrastructure for proposal mitigated or paid by developer but I did not notice what it actually commits to in some cases (e.g. it mentions unfunded new bridge in city plan (city responsible?), increase roundabout to 2 lanes from one, capacity haul road, what would be considered city road and infrastructure vs developer for proposal). Same with upkeep and maintenance costs. 124-2
3. Increased road maintenance costs to existing roads – are they designed for volume and weight of vehicles. 124-3
4. PCI area 1 retail is based on 12 wineries or outdoor equipment manufacturer / comparison to Woodinville (no mention local winery volume or impact to local businesses). I have not lived here that long but I don't think that Snoqualmie is comparable to Woodinville. 124-4
5. Projected revenue looks overly optimistic (impact of COVID 19: will businesses need more space per employee in future / restrictions on number allowed in retail). Yes, I know this happened after the report was done and impact on tourism is unknown. 124-5
6. How old is flood plain map (1984 is one date I saw), since they want to remove winery site from FEMA map (3-191)? 124-6
7. Are powerhouse and planer buildings important? Says will keep and use if economically feasible. 124-7
8. How recent is the traffic study? Is the date for I-90 completion optimistic? 124-8

Specific pages

1-8... Erosion hazards: If any occur who is responsible for correcting and is there a possibility irreparable damage might occur? It mentions drainage channel and river bank erosion / river migration (I know it does that without development). 124-9

1-12 Air quality: Do you need to worry if fuel standards lessen. 124-10

1-14... Increased water drain to river & Borst Lake / what is impact and who monitors treated storm water; mentions Borst and warmer water into river (will not harm aquatic life but is there a limit to amount and temperature?) / any monitoring? 124-11

1-19 Mitigation may include blackberry removal / since invasive plant why not should 124-12

1-28 Architect or architect historian should be present / why not will or must 124-13

1-42 Referenced permits etal: winery - is it easy for wineries to obtain DOH construction document (maybe project report) and engineering report for Ecology / also permit re storm water pollution protection plan and monitoring

124-14

- The Snoqualmie Mill site will be included as part of the City's retail water service area for the 2020 WSP update. As such, it includes the jobs and population associated with the Snoqualmie Mill proposal, except for any winery production at the Snoqualmie Mill site. At a minimum, Department of Health (DOH) construction document approval will likely be required, but the development also may require a Project Report.
- The Snoqualmie Mill site will be included as part of the City's sewer service area for the 2020 GSP update. As such, it includes the jobs and population associated with the Snoqualmie Mill proposal, except for any winery production at the Snoqualmie Mill site. The Department of Ecology (Ecology) may require an Engineering Report outlining any proposed winery production at the Snoqualmie Mill site.

1-44 Does city have adequate water and waste treatment facilities? Appears to refer to studies that are not completed

124-15

The 2020 GSP update is currently evaluating alternatives for increasing the wastewater treatment facility's rated BOD_5 loading capacity. Stormwater discharge would increase, but design features incorporated into the Proposal (e.g., water quality treatment) and proposed measures would mitigate significant impacts to water quality.

2-2... Extent of wetland buffer encroachment / intrusion for commercial use

124-16

2-19 Will sell to developers to build. Will there be sufficient future funds to maintain open space, trails, buffers, drains if bankruptcy?

124-17

3 - Policy / discussion references shoreline master plan (urban flood plain / conservancy), other sections, and other stuff not in what I have so no way to tell if comply e.g. how outflow to river is regulated (3-186)

The City of Snoqualmie adopted an updated SMP in May 2019; the Plan is under review by Ecology as of this writing.

Approval of the PCI plan is required before any development applications may be submitted for the property. The Snoqualmie Mill property owner would not submit a shoreline substantial development permit application until the City has adopted an updated SMP; the June 2017 draft SMP is the most current document available and is used to indicate the City's direction. The City's current update schedule indicates that an updated SMP will be adopted in June 2019.

...

124-18

The property was annexed in 2012, and the AIP, adopted in 2016 and discussed above, also identified the proposed shoreline environment designations for the property. The city's SMP update process is ongoing as of this writing.

...

Discussion

Proposed uses – for the overall PCI Plan and for Planning Area I – would be consistent with those permitted in applicable shoreline environments identified in the City's adopted SMP update.

Letter No. 125

From: Mark Hofman <MHofman@snoqualmiewa.gov>
Sent: Friday, July 24, 2020 10:25 AM
To: Richard Weinman
Subject: Fw: Snoqualmie Mill Plan
Attachments: DN Traffic Consultants report (1).pdf

From: jeff glaser <fishlip999@gmail.com>
Sent: Friday, July 10, 2020 5:24 PM
To: Mark Hofman <MHofman@snoqualmiewa.gov>
Subject: Snoqualmie Mill Plan

CAUTION: This email originated from outside the City of Snoqualmie. **Do not click links or open attachments** unless you recognize the sender and know the content is safe.

To: Mark Hofman, Community Development Director, City of Snoqualmie

From: Jeff Glaser and Claire Nold-Glaser

Date: July 10, 2020

Re: Snoqualmie Mill Plan

We are writing to express concern regarding the proposed development at the Snoqualmie Mill site. We are newer members of the Snoqualmie Community Action Network and have lived in Fall City since 1994.

We are nowhere near expert in the understanding of the multiple serious issues related to this development, but perhaps that makes our understanding of the problematic nature of this development even clearer. It doesn't take an advanced degree to understand the negative effect of any phase of this development.

The primary reading and studying that we've done includes the DEIS, the developer's website: Snoqualmiemill.com, the Snoqualmie Mill Planned Commercial/Industrial Application and the DN Traffic Consultants Review of the Mill Property, see attached.

The DN Traffic Consultants Review should cause anyone who travels on the relevant roads and bridges cited to have grave concern about the future of these passages. These findings also clearly indicate the lack of substantial research done by Snoqualmie Mill Ventures LLC. Specific issues of concern include:

- The DEIS failed to address the impact of project generated traffic on Snoqualmie Valley Bridges particularly the Railroad Avenue Bridge and the Meadowbrook Bridge.
- The study of the Railroad Bridge showed failure of the bridge supports. An updated study of the bridge should be performed to determine current condition and what needs to be done to ensure safety of the bridge.

125-1

- The DEIS erroneously analyzed the Meadowbrook Bridge as a two-lane signal-controlled intersection. The bridge is in fact a single lane bridge and requires a special approach to the analysis which considers the capacity constraints of the bridge. 125-1
- The DEIS fails to completely identify, analyze, and mitigate the impacts of construction activity on the study area roadways and intersections. 125-2

Our property in Fall City abuts the Fall City-Redmond Road, so this point is especially concerning to us:

- The DEIS fails to discuss the potential for traffic diversion through the valley. Currently, congestion at the at I-90/SR 18 forces traffic to divert to other routes for access to I-90 including Exit 22 – Preston/Fall City, Exit 27 – Snoqualmie/North Bend and Exit 31 in North Bend. The analysis should identify the potential for traffic to divert to alternative routes. 125-3

Over the years we have lived in our home, there has been a marked increase in traffic volume, related noise pollution and car crashes on Highway 202. 125-4

In the conclusion of the DN Traffic Consultant's report, the following points are made:

- The DEIS for the Snoqualmie Mill Site PCI proposal **fails to adequately address** the traffic and transportation related impacts of the proposed Snoqualmie Mill Site PCI project. In general, the DEIS highlights many of the issues, but **fails to do the in-depth analysis** necessary to understand the impact of the proposed action. The DEIS analysis has attempted to apply national data to analyze the conditions when local data is available and would better represent the Snoqualmie Mill Site project and the environment in which it is placed. **The DEIS should be redone** to provide a significant and in-depth analysis of the project traffic impacts. 125-5
- The study failed to sufficiently address the traffic related issues associated with the anticipated construction. The impact of construction traffic is significant on roadway capacity and the impact on pavement. **These conditions should be known and understood as part of the DEIS process**. **The Applicant should be encumbered with the cost** of improving the pavement after construction. The cost could range from resurfacing through an overlay or complete reconstruction of the road if the pavement fails. 125-6
- The project should not be allowed to proceed **until funding is secured for all improvements necessary** to provide an acceptable level of service. If public funds are not available, the Snoqualmie Mill Site project should provide a bond for the cost to construct these improvements. 125-7

It is abundantly clear to us that the haste Snoqualmie Mill Ventures LLC has exhibited runs contrary to the statement on their website that includes, "Thoughtful design standards uphold the vision and heritage of the property and surrounding valley. By respecting the spectacular natural surroundings and encouraging green building practices, Snoqualmie Mill represents a perfect opportunity for the right business development and commercial space."

We do not support any phase or plan of the proposal put forth by Snoqualmie Mill Ventures LLC. 125-8

that, so I am going to go ahead and begin, and people can continue to do that as we go any time.

During this, you can go ahead and raise your hand and add yourself to the list.

The first three speakers will be Richard Scheel, Cynthia Krass, and Elaine Armstrong.

So beginning with Richard Scheel-- or maybe not.

MR. ROGERS: Richard is there.

I just have-- like I said, I have to make people panelists so they can turn on their video as an option, so they will disappear from the attendees and jump into panelists, so you will see a slight delay with that, but Richard, you are up. Go ahead.

RICHARD SCHEEL: Okay. Just turning on my video here. T1

My name is Richard Scheel. My address is 6701 West Crestview Loop Southeast, Snoqualmie.

So my comments actually have to do with the validity of the current DEIS review process.

I claim that the current SEPA process for this project is not being handled in accordance with law.

I submit the following:

One, the EIS was not completed within the time period required by Snoqualmie Municipal Code, Section 19.04.080(C) of the Snoqualmie Municipal Code states, T1-1

quote, "Environmental impact statements shall be completed within a period to be set by the responsible official not to exceed 180 days, unless the City and the proponent of the action agree in writing to a longer time," end quote.

Mark Hofman, the SEPA responsible official for the City of Snoqualmie, stated to me in an e-mail, dated May 13, 2020, quote, "The DEIS for the Snoqualmie Mill proposal has been in preparation for some time, as you recognize, and there is no applicant city agreement to an additional time extension," end quote. T1-1

The draft EIS for this project has taken approximately three years to create, which is far in excess of the 180 days mandated by the municipal code.

The second point, as far as complying with the law, publishing the draft EIS during the declared state of emergency is contrary to the governor's proclamation 20-28, proclamation 20-28 issued on March 24, 2020, with several extensions, most recent of which is 20-28.3, dated May 12th, 2020. T1-2

It states, quote, "Agencies are further prohibited from taking action as defined in RCW 42.30.020 unless those matters are necessary and routine matters or are matters necessary to respond to the COVID-19 outbreak," end quote.

Washington state's attorney general issued guidance to state and local agencies on March 26th, 2020 regarding how they should understand the meaning of "necessary and routine matters." T1-3

"The main guidance on whether something is necessary is to consider whether the action must be done at this time or if it could wait until later."

Since this draft EIS took approximately three years to produce, I claim that it is not necessary to have the public review and comment period during the state of emergency. It could wait until the state of emergency has ended.

The attorney general's guidance on whether something is routine provides questions that an agency should ask itself when deciding that a matter should not be considered routine.

The questions are quote, "Is the reason for meeting on the manner unusual, special, and/or expected to be controversial and for which T1.3 ce will be a high public interest?"

"If they're exceptional or unique new"-- can I finish reading this piece? I am very close here.

MR. JOHNSON: Sure.

If you have it written, you can always submit it.

RICHARD SCHEEL: I will wrap up very

quickly then and I will submit the rest on paper, but-- it also gives guidance to the local government, which they're violating. T1-3

With that, I ask for the draft EIS to be withdrawn by the City and handled at a later date. Thank you. T1.4

MR. JOHNSON: Thank you.

All right. Next up we have Cynthia Krass, and she will be followed by Elaine Armstrong and Haley Williamson.

CYNTHIA KRASS: My name is Cynthia Krass. I'm the executive director of the Snoqualmie Valley Preservation Alliance, a nonprofit dedicated to protecting lives, livelihoods and lands of Snoqualmie River Valley. T2

We are particularly focused on protecting farmland in the lower valley, with emphasis on water resources, flood impacts, and separation of agricultural soils.

I make the following public comment on behalf of our entire board:

The team of SVPA board and staff members have conducted preliminary review of the DEIS.

As you may expect, understanding downstream impacts of this proposed development is a high priority to the valley community, especially that pertains to the lower valley and agricultural production district.

We will be closely following all permit actions related to the following concerns:

Floodplain development. Any flood-- any development in the floodplain must be carefully evaluated for downstream impacts. T2-1

Flood storage. Loss of storage above the falls is an ongoing concern because the effects and timing-- effects on the timing and magnitude of flows passing into the lower valley-- and, the lower valley, of course, is experiencing more impacts during high water events. T2-2

Base flow reduction. The effects of development on groundwater and associated base flows in Tokul Creek and the Snoqualmie River must be carefully evaluated. T2-3

Also, this idea of baseline definition, we are wondering how the baseline is defined for zero rise flood analysis, given the history of unpermitted fill dating back to the 1970s.

We have the following questions and requests:

How is the City addressing the comprehensive plan policies concerning annexation implementation; specifically, the policies pertaining to annexation of the Snoqualmie Mill area regarding the requirement of removal of the floodplain fill prior to development? T2-4

The project site has a long history of fill dating

back to the '70s. How does the flood impact modelling address the unpermitted fill? T2-4

What are the anticipated impacts to threatened and endangered species? T2-5

Finally, a request:

We understand that June 11th is already a 15-day extension to the public comment period. T2-6

However, given the complexity of the project, the sheer volume of the DEIS documentation, and the COVID-19 pandemic, we respectfully request an extension to the written public comment, beyond the current June 11th, to July 10th.

Thank you.

MR. JOHNSON: Okay. All right.

Next up we have Elaine Armstrong, followed by Haley Williamson.

I don't have anyone else that has raised their hand at this point, so just those two.

ELAINE ARMSTRONG: Thank you for this opportunity. T3

My name is Elaine Armstrong at 7726 Fairway Avenue Southeast, No. 502, in Snoqualmie.

I am a representative of Citizens' Climate Lobby, and I have -- so I want to talk about things related to greenhouse gases beginning with the-- it hasn't been

called affordable housing, but the housing that is supposedly going to go for the workers that are going to work in the light industry and warehouses, et cetera, that are planned for Plan No. 1, but it's noted that these houses will have-- these apartments will have a Mt. Si view and will go at current market rates. T3-1

I am sure you can imagine that people are unable to work in these kind of industries and afford current market rates, certainly out in Snoqualmie, which indicate-- which brings us to the fact that I think that the traffic assumptions that were made were not-- are not enough because having dozens of workers who have to commute in to town, which brings associated hazards of driving in bad weather over Highway 18, et cetera, as well as-- I'm sorry, I have written all this out. T3-2

So we also have a history in this town of not being really careful of maintaining affordable housing, so if this housing is indeed intended for the workers, we need to have some sort of things put in place to make sure it's kept at an affordable level because we have a bad, bad history of losing our affordable housing to market rates. T3-3

I want to go on to the LEED certification that was mentioned that the builder or the developer is saying that he is in favor of a LEED certification at the gold T3-4

or platinum level, but he is going to be selling these units or these plots of this mill site to other developers, and I would like to know what kind of protections we have, as a City, that those developers will want to support this. T3-4

I know it's voluntary. I don't believe we have any regulations along those lines, but I would like to know what kind of protections we can have.

The other question I have is about traffic studies related to the greenhouse gas section because it was stated that those traffic studies were done in 2018, and as I'm sure you recognize, that was the year we had unprecedented snowfalls, so if the traffic studies were done during February, that is not really an accurate reflection of what the actual kind of traffic we might have would be. T3-5

Also, there are several references to the fact that we don't have to worry about greenhouse gases because of more efficient cars and the regulations on miles per gallon and efficiency. T3-6

As you may have noticed, we are losing those regulations, so that's disingenuous.

The fact that we will probably not be getting more efficient cars, et cetera-- so it may not happen.

Finally, I would like to say that I am concerned T3-7

that-- the statement was made that the greenhouse gases will not be affected because-- sorry, climate change will not be affected by this small development because climate change is so huge.

Of course anybody could say that, but to support the State's determination to reduce our greenhouse gases by 25 percent by-- sorry, down to 1990 levels by this year, and our own city's agreement with the K4C, the King County Cities Climate Collaboration agreement, to reduce our greenhouse gases by 25 percent by this year, neither of which we are even close to-- so this seems disingenuous not to really deeply support those.

T3-7

Thank you.

MR. JOHNSON: Thank you.

All right. Next up we have Haley Williamson, followed by Monica Lowney, and the telephone number has-- the last three of the telephone number is 721. That will be the third person.

HALEY WILLIAMSON: Okay. So I'm up?

T4

Okay. So my name is Haley Williamson, 40217 Southeast 53rd Street, Snoqualmie.

I would like to just kind of reiterate a couple of points that were made here.

I am not representing any group or anything, but I do live in the community that is across the river that

is directly above the mill site.

We are, as a community in the neighborhood, outside of city limits, which means that we do not get to vote on any of these decisions.

The City has been annexing land both above Tokul and the mill site up to our backyards, even though we are not able to make any decisions on that, so I've got a couple points I wanted to make.

First, I would like to reiterate a point that was made that 45 days-- I understand this is an extension on the time to review. However, I believe it is insufficient during a global pandemic. T4-1

People are struggling to survive right now, and in order to fully give people a chance to review this document and review the studies, I believe that needs to be extended.

Secondly, like I said, I live in the community directly above the proposed mill site, and we will be most impacted. T4-2

Currently our roads are insufficient.

We have tons of trees that fall down during the windstorms, and flooding is a major impact in our community.

I do not believe that what I have seen so far in the DEIS accurately details all of those issues.

Third, again, we haven't had much time to review this document, but in briefly glancing at the traffic report, I was curious about the validity of the data on this side of the river, on the Tokul, Mill Pond, Reinig Road, and 396th. T4-3

I notice that on the date it looks like that they were mostly from January and February of 2018, but I did not see any data, and maybe I just missed it, on the summer, like for the summer, on this side of the river.

We have a lot of trails. Many people use the river access along Reinig Road, and I would like to see studies that detail the increase in traffic during the summer season. T4-4

I am also curious to know how much we can account for the growth around the high school. We just have this giant new high school, and I'm curious to see how the traffic at the high school will impact. T4-5

Again, I haven't had fully time to delve into the DEIS, but those are my questions at this time about the area.

Thank you.

MR. JOHNSON: Thank you.

All right. Next up we have Monica Lowney, followed by telephone number ending is 721, and then by Carol Fix.

MONICA LOWNEY: Okay. Hello. I am Monica Lowney, and I am a resident of Snoqualmie for seven years. T5

My address is PO Box 493, Snoqualmie, Washington.

Today I'm speaking on behalf of the Sierra Club, therefore I should be allotted five minutes.

I have several concerns and some were mentioned already.

For example, I do believe the City of Snoqualmie is violating the fair municipal code by not publishing the DEIS within 180 days. T5-1

I also believe they are violating the governor's proclamations regarding the pandemic that we're in, that cities should only be operating in ordinary or necessary business. T5-2

Releasing the DEIS is not ordinary or necessary at this time, and I would like to ask for an extension and a public meeting in-person that senior citizens can actually attend that are not tech savvy.

I also believe the City is violating the state attorney general's guidelines, which this does not fall under necessary or emergency.

The SEPA rules, I believe, are also being violated today because citizens are limited to three minutes when they should be given more time to have their say, since T5-3

this is the only so-called public meeting that we are having.

I have been sharing a lot of information with professionals and higher-level people within our state, and I simply have to say they're absolutely shocked by the City's way of handling this DEIS. T5-3

Quite frankly, what most tell me is it's very disrespectful to citizens, and citizens would like to work with their city, they would like to have respect, trust, support, and compromise.

Therefore, I believe this should be extended, there should be another meeting, and this process should not move forward at this time.

However, there are several areas that I'm very concerned with, and I will try to touch on a few.

However, in this short time that I'm allotted, I cannot go into depth, but I will touch on them.

I believe Borst Lake not being included in this DEIS is unacceptable. T5-4

We know that this Weyerhaeuser land was used for many years as a mill site, and PCB soils were present all around the property, including in Borst Lake.

There were logs soaked with creosote in Borst Lake.

We had toxic coolant that individuals, who are still alive and live in our city, will tell you were

dumped in Borst Lake.

We do live in a flood zone.

These waterways flow into the Snoqualmie River and eventually into the Puget Sound, which we know we have a major problem with our orca starving because there are no salmon to feed them. T5-4

I believe analysis of this lake needs to be added in the EIS.

It is a detriment to the project and our community and the environment to not include analysis of Borst Lake, known as the Mill Pond.

As we know, the Department of Ecology's solution, when they found the PCB soil contamination, was to simply cover it with clean soil. T5-5

Some soil samples may have been taken. However, they did not go deep enough to reach where the actual contaminated levels are.

In other words, surface samples will simply not do, so I would like to see analysis done on Borst Lake. T5-6

I would like the Army Corps of Engineers to be notified, which I did not see any report from them, regarding the berm that they placed around Borst Lake to prevent future flooding, which is not specified.

Transportation is another major concern of mine. T5-7

As you mentioned in phase one, you want to approve

a heavy industrial site, basically using the large warehouse buildings, which another concern is I do not believe our fire department even has the equipment available to reach such heights if a fire does break out in one of these warehouses, but our roadways simply cannot tolerate or support trucks that weigh tons coming from the Port of Tacoma, up Highway 18, and, of course, Seattle, up 90. T5-7 T5-8

As you know, the State wants to revamp our-- I'm sorry, but that's not five minutes.

Are you cutting my time short?

MR. JOHNSON: This is four and a half minutes now, so--

MONICA LOWNEY: As you can see, this is not due process.

Also, I would like to say there should be no spraying of pesticides near our waterways. T5-9

Weyerhaeuser used to have a baseball field on this property, which is not specified.

There is actually a lot of historical culture with our Japanese migrants that work here that are not being addressed. T5-10

There are sites that should not be built on that have a parking lot listed over it.

Regarding Weyerhaeuser, what I wanted to say is the

baseball field had to cleared in 1974 due to mosquito outbreak. T5-9

I would like to see if any mosquito assessments have been done in the DEIS. I did not see it.

It's impossible to read 3,000 pages in three weeks. T5-2

Please give us more time and be respectful to citizens.

Thank you.

MR. JOHNSON: Thank you, and we'll receive your written comments as well, thanks.

All right. Next up is a caller with the last three numbers 721, following by Carol Fix and Lesley Sheppard.

MR. NORRIS: This is Gary Norris. I T6 am-- 5721 is my number.

Just a technical comment, I entered my *9 three times before I was finally recognized, so I don't know if there's an issue with that, but I want you to be advised of that.

I cannot see you now that I'm talking, so I don't know how you're going to notify me when my time is up, but I will wait for you to hear that.

I am-- was asked by Monica Lowney to assist her and represent her group in review of the traffic impacts of this proposal, and I'm going to start and go through this real quick so I meet my time limit.

First thing I want to speak to is the traffic counts.

The majority of the traffic counts are over two years old. T6-1

Typically in traffic impact analysis on SEPA, they're limited to one year in their duration before they're judged too old for further evaluation.

Secondly, the counts were taken during the month of January and February, typically the lowest volume months of the year, and just to confirm that, I did a comparison of the traffic count taken in February on the Snoqualmie Parkway, one at Railroad and one at the I-90 interchange.

There was a 20 percent difference between the May, June count at Railroad and a ten percent difference between the count taken at the I-90 interchange.

I think the study warrants an identification of an average condition volume across the corridor and not extreme locations.

The other thing is traffic counts were taken on average weekdays. There was no weekend volume analysis or summer recreational traffic analysis that was considered in this, which I think is important in this area where we see a lot of extreme volumes during the summer recreational time.

Moving on to trip generation, the analysis focused on vehicle trips. There was no discussion of modal split or auto occupancy in this analysis.

In our age today, we are really looking at all modes of travel. This EIS needs to evaluate all modes, so we need to have some discussion of pedestrian and bicycle traffic and their impacts. T6-2

I was a little bit concerned about the analysis that deducted 1,500 daily trips from the shopping center evaluation and passed them off as pass-by trips.

This is truly a misrepresentation of what pass-by trips are as they refer to the trips on the roadway network directly adjacent to the development, in this case the shopping center, which would be the Mill Pond Road, which I'm sure does not currently have enough traffic on it to support a 34 percent reduction.

I think that needs to be looked at further.

Safety impacts, the crash potential with the proposed traffic increases was not addressed. T6-3

There's no consideration of the target zero goals that have been established by the State of Washington.

There's no attempt to mitigate high crash frequency types through the use of the highway safety manual or clearinghouse modification factors.

Moving on to--

MR. JOHNSON: 30 seconds.

MR. NORRIS: There is no traffic on the bridges-- the Meadowbrook Bridge analysis stated the bridge is a two-lane roadway, and my last check, there is only one lane on that bridge. T6-4

Impact to regional transportation system, 20 percent of the traffic was oriented to the northwest, yet there's no evaluation of intersections to the northwest of the site. T6-5

Construction impacts, a very vague discussion of construction impacts. There needs to be a much more thorough impact-- impact to pavement condition, mitigation, halt times-- those kinds of things.

There needs to be addressed a pedestrian and bicycle impact. T6-6

Funding was not identified or supported that's going to build these projects, and the market-- there needs to be a market analysis of the assumption of retail, residential, and office space to document and confirm the rates that are being used in the evaluation. T6-7 T6-8

Thank you.

MR. JOHNSON: Thank you.

All right. Next up is Carol Fix, I believe.

I am still seeing that telephone number up there, but I think we've finished with that.

We have Carol Fix followed by Lesley Sheppard and Annie McElroy Johnson.

CAROL FIX: Am I up? Is it ready? Can you hear me?

This is--

MR. JOHNSON: We can hear you.

If you would like to have your video, you can turn on your camera.

CAROL FIX: I'm not sure how to do that. I'm trying.

MR. JOHNSON: Lower left corner there will be a little video cam.

CAROL FIX: Okay. Usually my camera is very poor quality anyway, but okay. T7

This is Carol Fix. I live at 40307 Southeast 53rd Street, Snoqualmie.

I am on the loop road up to the north of the site.

Mainly the request I would like to make right now are the comments to request an extension. T7-1

There is an incredible amount of material, and it can be very daunting to try to find everything on the computer.

I would like-- I have requested a paper copy.

A public meeting would be the best where there are actual maps that you can look at.

I have not been able to find a map that shows a clear access point to this site and how traffic can be analyzed properly without knowing where it is, how it is oriented, through flood zones-- seems impossible to me. T7-2

The traffic analysis was, again, only done several years ago. It was done before the high school traffic was completed, and also not during the hours that the high school traffic was going in and out. T7-3

Again, other people have commented, there's no analysis of weekend visitor traffic, particularly when there are tourist-focused activities proposed, wineries and that sort of thing. T7-4

Basically I guess my first request is for an extension, and preferably better mapping and better proposal information.

MR. JOHNSON: Thank you very much.

Next up is Lesley Sheppard, followed by Annie McElroy Johnson and Amanda Rich.

Lesley, you are still muted.

LESLEY SHEPPARD: Not anymore. Can you hear me?

MR. JOHNSON: There you are.

If you would to have a camera on, you can-- there you are.

LESLEY SHEPPARD: Okay. My name is T8

Lesley Sheppard.

I live at 7516 Snowberry Avenue in Snoqualmie.

I am going to try to hit on a few topics that I haven't heard our speakers talk about prior to myself.

Number one, I went to the scoping meeting approximately three years ago, and the developer had sold to or explained to everyone in the presentation materials that this was going-- this project was only going to have light industrial. T8-1

I am seeing in the report "heavy industrial," and that-- I need that clarification.

If it is heavy industrial, I am really confused as to why the City is tearing down homes in the floodplains but then will allow heavy or even light industrial.

I am actually confused why this project is being allowed in the first place in a flood zone and floodways, especially when we're at the top of a watershed. T8-2

I would like to get that addressed.

Number two, we just spent years on a shoreline development plan. T8-3

Again, in 3,000 pages I did not see reference or any sort of combination of working with the shoreline development plan.

Does this DEIS take into account what the City has

been working on for so many years with the shoreline development plan? If so, how do the two mesh together? T8-3

I have noticed, as Monica Lowney said, that there is no addressing or no inclusion of Borst Lake, which I believe is also called Mill Pond, which has been widely known as the dumping ground for the mill site before. T8-4

Excuse me, I'm just checking my notes here.

I believe everything else, besides that, has been addressed, so thank you.

MR. JOHNSON: Thank you.

All right. Next up is Annie McElroy Johnson followed by Amanda Rich, and at that point we don't have any others waiting beyond.

MS. McELROY JOHNSON: Hello. My name is Annie McElroy Johnson. I'm a Snoqualmie Middle School teacher, and I live at 41502 Southeast Reinig Road. T9

I wanted to address a few different things here, starting with the accessibility, some biological and ecological issues, and then also some issues with the traffic.

First off, I am in an unincorporated area, so that means I can't vote on these issues. T9-1

That also means that while I have gotten through some of this dense material-- it isn't a ton of time,

along with the virus and everything else, to go over all these pieces, so I agree with a lot of other people that I think we need an extension on this. T9-2

As far as biological factors, I think that this plan goes over a lot of details, such as flooding issues, erosion, the soil types and things like that, which is great, but I'm not seeing a lot of detail as to how this affects where construction will happen, where development will occur, and if this changes in either plan. T9-3

I am not seeing a lot of specific details about how they're going to minimize the impact to these, and especially with what Monica was saying about the pollutants that are already existent at the mill site and at the lake. I think this is really important to get a lot more specific details on. T9-4

Although it is a draft, I think that needs to be a lot more in depth.

Also, with the construction, this is a major habitat corridor, and even though it had a lot of open space planed in the site, there's a lot of elk and other animals, such as foxes, that come through this way, that could be impacted, and that can be a very busy road, especially in the summer. T9-5

There's the Tour De Peaks bike trail that is not T9-6

listed in the plan, and how that may impact the traffic in the summer, for sure if it's a concert venue, and also how this could impact the animals that go through there. T9-6

Already there's a lot of elk that are hit from the major roads, like 202, and so this could be a major issue on that road.

Those are some of the issues I wanted to go over.

Thank you.

MR. JOHNSON: Thank you.

I want to just compliment everyone that has been very good about staying close to the time, and you are doing very well.

We have Amanda Rich up next, and I wanted to say that if you are having trouble with the-- if you're calling in on your phone and you're having trouble with the *9, to raise your hand.

You can also e-mail Jason or Mark in order to let them know that you'd like to talk, and we'll figure out a way to allow you to speak.

I now have Amanda Rich coming up and Auryel Van Gemert. I'm probably not saying that last name very well, but forgive me.

Anyway, we'll begin with Amanda.

Amanda, you are still muted. There we go.

AMANDA RICH: Okay. Great. T10

Okay. I think my internet just did something weird right as you--

MR. JOHNSON: When we connect you, for a moment you go blank because we have to change the status momentarily.

AMANDA RICH: Got it.

I thought I got kicked out, and I was like, "No."

Thank you so much for calling on me.

In reviewing the EIS-- and I have to agree with everyone that it is a very dense document. I had to Google some of the terms and educate myself on traffic and what "level of service" means in terms of grading it from A through F. T10-1

I have to say I agree with the other comments on the traffic in terms of when the counts were taken, that it was a weekday and not weekend. T10-2

I don't need to reiterate as much of that.

I was concerned that it says in the document that level service-- it essentially says it fails to meet the sort of general standards for traffic. T10-1

The document even says that "Traffic and congestion will be unavoidably increased."

I was also concerned that the document also says that "Traffic noise from public roadways are exempt from T10-3

applicable sound level limits," and I just don't think that all of us should have to accept that this traffic noise may interfere with the enjoyment of our outdoor activities, that that's not part of the environmental impact. T10-3

Living here, I don't find that acceptable, and I feel that interfering with our enjoyment of outdoor activities, especially in an area that is close to hiking and recreation trails, that is near Snoqualmie Falls-- I don't find that acceptable.

One of the things that I was really surprised at, when I was looking at the section on the impact on public services, is that it mentions police and fire, but there's no mention of the impact in terms of services at our local hospitals. T10-4

When you're talking about a development that is going to increase housing and, you know, I guess, office space, but also an event space, either the indoor one that's in the main proposal or the outdoor space, which is in the alternative, I don't see how an event space is not going to have an impact on our hospital, and I did a word search. I can't find any mention of an impact to the hospital.

There's historic mention of the development out here in general and that there is a hospital.

There is no impact-- there is no mention of anyone speaking to anyone at the Snoqualmie Valley Hospital in terms of them being able to handle an influx of patients, you know, potentially from events, because we don't know what kinds of events are going to be held at these spaces and we don't necessarily have control over that. T10-4

When you talk to other rural communities and people at rural hospitals that are adjacent to event spaces that host concerts and festivals and that kind of thing, they inevitably see impacts from those events.

I think that I'm done.

MR. JOHNSON: All right. Thank you very much.

All right. So we have Auryel Van Gemert, and a caller whose last three digits are 096.

Auryel, we can see you, if you would unmute your computer--

AURYEL VAN GEMERT: Can you hear me now? T11

MR. JOHNSON: If you would like to turn your video on, you can, but you don't have to.

AURYEL VAN GEMERT: Actually, I lost my notes because of the screen, and I don't know how to use Zoom and my notes for this.

So in general, I work with the Climate Reality leadership, and so my bigger concerns would second Elaine Armstrong's and then the Snoqualmie Valley Preservation Alliance in addressing climate change related to this development. T11-1

Heavy industrial and light industrial on a known contaminated site, I'm really concerned about what that will do to the Snoqualmie River, and that therefore, by default, the Salish Sea, and how that will impact the fisheries downstream. T11-2

Then one of the things that I read, and, again, I can't get to this piece of the document, but it was talking about the endangered species and the animals that will be impacted, and there was one paragraph that just jumped out, and it said basically it will-- in phase one it will ruin the wildlife habitat and that the animals that are there will be displaced and will likely perish, and so the animals that are the foxes and the bears and the elk, and all of these beautiful things, will be gone and will be replaced with more urban-friendly animals. T11-3

I would like to know a lot more about all of that, and I also would like to know more about how intact ecosystems will be managed so they're not decimated but managed through the process.

I think that's it.

MR. JOHNSON: Thank you very much.

AURYEL VAN GEMERT: Thank you.

MR. JOHNSON: So we have a caller whose last numbers are 096. We'll connect you now.

JULIE LAKE: Hello?

MR. JOHNSON: Hello.

JULIE LAKE: Yeah, I am glad I happened to overhear about punching *9. T12

My name is Julie Lake, and I'm a citizen of Snoqualmie and a board member of the Snoqualmie Community Action network.

I have a long-term relationship with the Snoqualmie valley, and I've been participating in this particular process for about three years.

None of the specific issues within the DEIS, for which I will submit written comments-- I'm just awfully disappointed that you chose to send out to the people whom you represent a nearly 3,000 page document to be reviewed in a short amount of time. T12-1

You made it impossible to comment on the adequacy of the DEIS.

You may have heard that we're in a global pandemic, and during the shutdown, the citizens you represent, along with other stakeholders, they're having to concern

themselves with how to pay their bills, rent, mortgage, get groceries, along with a few that are getting sick and dying.

All of you ran on the platforms of public engagement. You rather emphasized it.

The way you have handled this matter is not only bad policy, but it's possibly a violation of a number of laws, and it's downright disrespectful and unkind to the people whom you represent. T12-1

I just want to emphasize, you all ran on the business of public engagement.

I would like to just ask for a postponement and extension on this whole process.

I have already written to ask for a real public hearing with in-person participation and-- yeah, so those are my comments for now.

I will e-mail you others.

Thank you.

MR. JOHNSON: Thank you.

All right. I think that was our last person who has asked-- but now we have one more who has just raised their hand-- two more, and then--

MR. HOFMAN: Mark, a reminder that we have at least two on another phone call that we could let speak, once you get to the end, to clarify, those

that are having trouble on the phone.

MR. JOHNSON: Okay. Great.

And we are picking up a few more here now.

I will turn now to Tom Wood, who will be followed by Monica Lowney, and Wayne Russell.

Tom, you are muted, so if you can unmute.

TOM WOOD: How is that?

MR. JOHNSON: That's better.

TOM WOOD: Okay. My name is Tom Wood. I live at 34515 Stellar Way.

In the air quality and greenhouse gas section of the report in Exhibit No. 3.2-5, the estimated greenhouse gases on Page 3-4-2, this covers the-- I forgot the term that you used-- the redevelopment alternative plan.

Where in this tabulation of estimated greenhouse gases is the 5,000-seat arena which would be associated with several thousand motor vehicles that would move twice during a three-hour or four-hour period?

Likewise, in Exhibit No. 3.2-1 and 3.2-2, there's no estimates of level of service for the parkway and westbound I-90 waiting on WADOT's final plans for the diamond interchange.

If that's the case that you couldn't estimate them for the westbound interchange, how can you have levels

T13

T13-1

T13-2

of service for the eastbound interchange at the same basic intersection that's involved in the same project? T13-2

I was trying to keep my comments specific.

Those are two things that leapt out at me immediately reviewing it.

I would concur with all the other comments that have been made, that this is a voluminous document, and to try to review it in 30 or 45 days is bordering on ludicrous.

That's all.

MR. JOHNSON: Thank you very much.

So it's been pointed out to me that we have a couple people who have signed up again who have already spoken, and one of our ground rules is just to have people speak one time.

I am going to turn to Wayne Russell next to get-- give Wayne a chance to speak.

Wayne, you are on mute.

There, I can see you and we can probably hear you now.

T14

WAYNE RUSSELL: Okay. I'm getting a phone call.

My name is Wayne Russell, 8438 Meadowbrook/Wildcat Way Southeast, Snoqualmie.

Having been a resident of Snoqualmie for 36 years

in the floodway, the implementation of the PCI and the DEIS required for this is quite concerning, since under County guidelines if this had not been annexed would not have been allowed. T14-1

Much of this process has been behind closed doors since approximately 2009.

It is obvious that the City and the expert developer have been communicating recently since the DEIS was made available to the City a year ago and this meeting recently scheduled.

One citizen did a public records request when we were informed that the City had received the DEIS last year. This person was threatened with a lawsuit by the City for requesting it, but it was more than what was there--

COURT REPORTER: Wayne--

MR. JOHNSON: I am going to pause for a second.

Sir, I think for the court reporter, if you could maybe just go a little slower.

I know you have a lot to say, but you can also provide stuff in writing, but I paused it while I am telling you this so you don't lose this time.

WAYNE RUSSELL: That's the german in me.

MR. JOHNSON: If you just try and-- you know if you go just a little slower and enunciate, it will help her get the words down.

We are recording it so that she'll have it to listen back to, but it's tricky with this medium, so--

WAYNE RUSSELL: Okay. I'll start where I think I left off.

Yet, the developer took three years to promulgate the DEIS, and the City has been reviewing it for a year, and the citizens are given 45 days.

T14-2

Again, the City just decided to pull this for a 30-day review by the public, but then the expert developer proponent requested the 15-day extension, so they appear to be the considerate party.

On Page 2 of the DEIS you will see any one of us could have requested the extension per the WAC or the SMC, but it looks better for the council and others who are approving if the site proponent requests it.

My concerns are the illegal berm placed around the old sort yard or phase one of the PCI of developer and various LOMR's, which have changed the designations on FIRM from floodway to floodplain introduced in 2010 which drastically changes the building codes used for both FEMA and the SMC.

T14-3

This DEIS uses 2012 LOMR of which was for the PSE

work at the falls. From these LOMR's, the base flood elevation was reduced by a little over a foot.

The revised 2010 maps placed the BFE from 421 feet to 420 feet.

So this brings a question of why so many areas in the FIRM maps at 420 feet are considered floodway now when the BFE is 420 feet and others are considered floodplain? T14-3

In Appendix A of the DEIS you will see Figure 2-6, the BFE is approximately 423 feet by this study group and shows adding fill above this level for proposed development.

You will also note that they are showing most of this area of existing ground being at approximately 415 to 420 feet.

I would question this since most of the areas along Mill Pond Road are at approximately 400 feet per GPS and topography lines, which I have furnished the City.

Now, the berms, which have been mentioned in the pre-annexation plan, AIP, and the DEIS all suggest the berms stay until the PCIP is implemented.

What goes on behind those berms with a company storing fill and materials behind those berms and the developer having to be turned in twice for not obtaining

clearing and grading permits.

Actual elevations should be provided by the Corps of Engineers.

To justify this is when looking at Appendix A, Figure 2-3, shown is a floodwater and wildlife underpass? With the elevations at the proposed roundabout where the jersey barriers are at present being approximately 400 feet, it would have to be the intent of adding 20 feet of fill to accomplish this to conform to their respective diagrams of Figures 2-6 through 2.8?

MR. JOHNSON: It sounds like you have those comments in writing, and if you could submit them, it will help.

There was a little bit of a problem with the sound quality coming across, and I know that the court reporter was struggling a little bit just to keep up with the--

WAYNE RUSSELL: I will do that.

Like everybody else said, it was 3,000 pages.

I just sort of went into the flooding.

Sitting on Meadowbrook Way across from the high school, I have met-- I have got lot of floods marked and I have heard spotty information from people.

MR. JOHNSON: Thank you very much for

T14-3

T14-4

your time.

WAYNE RUSSELL: Sure thing.

MR. JOHNSON: As I said, I'm going to keep going with people who have not spoken, and I'm going to move on then to Kim Lingo.

I have Ray Nelson also, and I don't believe Ray has spoken.

Kim Ling will be up next.

KIM LINGO: I am unmuted now?

MR. JOHNSON: Yes, you are.

KIM LINGO: Am I going?

MR. JOHNSON: You are going, and we have your logo up.

KIM LINGO: That's what you've got.

MR. JOHNSON: That's fine.

KIM LINGO: Here is the thing:

I think we can already tell there have been technical difficulties with this whole process and the ability for the court reporter to hear people who want to speak on such an important topic.

I think that just highlights why this should not be happening right now, and so I just wanted to voice my opinion that agrees with everyone else who has spoken so far that this needs to be postponed, if it happens at all.

T15

T15-1

I haven't had a chance to read 3,000 pages because not only am I considered an essential worker and still working full time, but I also have four children at home and I'm trying to do home-schooling with them, and I have 30 teachers I am trying to deal with. T15-1

You tell me, when am I supposed to read 3,000 pages?

It's ridiculous, so-- that's my comment.

MR. JOHNSON: Thank you.

So we'll turn next to Ray Nelson, followed by Denise Di Santo.

Ray, you are still muted.

RAY NELSON: Okay.

MR. JOHNSON: I can hear you now.

If you would like to turn video on, you may.

T16

RAY NELSON: I'll leave it off.

I just wanted to echo what I've heard by virtually everyone so far, is that the two weeks or so roughly that we've had to review nearly 3,000 pages of a draft EIS is really not adequate, and I did a cursory review, and I have a lot of concerns and questions, which is based on schedules and how most of us live our lives, it's really difficult to be able to fully investigate and answer those questions in the limited amount of time that we've been given, but, you know, based on the T16-1

concerns that have been raised and my concerns from just having a very cursory review, I think, you know-- I think it's fair and prudent that somehow this process be extended. T16-1

I do want to ask one question, is that if we submit written comments, will those comments be made publicly available?

So that's all I have.

MR. JOHNSON: Thank you.

Ray, before you go, I don't know if we got your address.

RAY NELSON: I'm sorry. I live at 38348 Southeast Cedar in old town Snoqualmie.

MR. JOHNSON: Thank you.

I haven't been as good as I might have been at asking people that, so I'm going to try to be getting better about that going forward here, so now I think there may have been one other person that got away without getting their address in.

Thank you.

I can tell you that all the comments will be public record.

Here we are.

Denise Di Santo will be next, followed by Christine Iverson Stinson.

Denise, we can see you, if you can unmute yourself.

DENISE DI SANTO: Got it.

Thank you very much.

T17

Denise Di Santo. I live at 7818 Douglas Avenue Southeast here in Snoqualmie.

I am calling to request an extension of this very voluminous document.

This is a lot of information, and as a professional in the environmental field, I can see that there's a lot of guesses and assumptions made throughout this document, in terms of floodway and so on, and not enough detail paid attention to the downstream effects of this proposed development.

T17-1

For example, Chinook salmon are an endangered species, as you know, and certainly people have mentioned orca, but my immediate to that is like the populations that are endangered just below the falls and occupy the Snoqualmie River main stem downstream from this development.

That said, I am concerned with the potential for entrainment of the contaminants that are at this site.

T17-2

It is a contaminated site, but really, you know, once construction begins, I don't know of the assurances that could be provided that you're not going to impact water quality both during and post construction as the

contaminates may be conveyed into the water.

The other concern I have is with the traffic, both during construction and post construction.

The volumes of traffic around here on weekends and-- I can't imagine what it would be like with you adding volumes of traffic for such a development, both for people working at the site and attending events and restaurants and winery activities and so on. T17-3

That was a grossly inadequate transportation survey that was done, I did note that, and they took out as well and-- I can say that that is not accurate and almost seems disingenuous to present those type of data for this type of a project when this type of development will not just occur for having impacts during the weekdays but also weekends and evenings.

I would request that this process be re-looked at again as per previous comments, but this is not a good process so far, and that this should be delayed for a proper public meeting, and really giving better attention to ensuring that the public concerns are heard and actually reflected in the final plan for this site. T17-4

Thank you.

MR. JOHNSON: Thank you.

So I'm going to pause on our list here because we have a couple of other folks who have been calling in,

and I'm not sure, Jason, if you know how we can get Cristie Coffing, Sharilyn Lux, and Greg Balmer in.

MR. ROGERS: So my understanding is that they are sitting with-- all three of them are sitting together, and so what I'm going to do is I'm going to let Cristie Coffing come on here, and they can hopefully go one after another.

MR. JOHNSON: Okay. Great.

CRISTIE COFFING: Okay. Here I am. Can you see me?

MR. JOHNSON: We can hear you.

We can't see you yet-- there you are. I can see you.

CRISTIE COFFING: I also have Sharilyn here and Greg Balmer as well, so we all had difficulties getting in, but that's for the record. T18

I am Cristie Coffing, at 8054 Maple Avenue Southeast, downtown Snoqualmie.

I am a board member of Snoqualmie Community Action Network and a founder of the Black Dog Arts Coalition 501(c)(3) and a business owner in downtown Snoqualmie, Black Dog Arts Cafe, Incorporated.

I would like also to mention that having a 3,000-plus page document during a pandemic, when we are in survival mode, I think goes against all the

principles that we elected you for office for, for protection and respect, and just general kindness towards the community.

To begin with, I'd also-- I would like to say that on July 7th an emergency resolution was drafted by the Japanese American Citizens League of Washington, DC, relating to the preservation of Snoqualmie Falls Lumber Company's site, where workers harvested and milled timber and built-- helped build forest railway lines from 1917 to 1942, until their internment. T18-1

Now, the proposal that the JACL reviewed, the emergency resolution, was not submitted in a timely manner because they were not-- they did not receive the May 3rd, 2017 filing notice of application and scoping for planned industrial development within the boundaries of a historically significant site until May 23rd, 2017, so their proposal wasn't given to you until July.

This was an inadequate process of notification, as they obtained information of this development through a citizen of Snoqualmie.

The JACL also is not mentioned anywhere in the DEIS nor in the appendix of the cultural resources section, so let it be known that mention is Karen Yoshitomi, the Japanese Culture and Community Center of Washington representative, but not the JACL.

Then when you go to your notices in your DEIS of the agency contacts and interested parties, neither one of them are mentioned, so I'm taking it they didn't get notification of this draft EIS. T18-1

Going from that point, you can read their emergency resolution, as I will be attaching it to my document, my e-mail to the City and my letter, but I don't think that this is being considered at all in the DEIS.

On October 9th and 10th of 2017 you had an archaeological field study at the mill site, and a series of trenches were dug, and in trench five at the top of stratum four, as of Page 53 of your appendix for cultural resources, artifacts were found, and the exploratory dig was halted. T18-2

The objects were brought to the surface, and there were many objects that represented Japanese culture.

On Page 55 of the appendix for cultural resources, you state that "This site, 45-C1-1474, Page 5, appears to meet the eligibility requirements for a listing in a heritage registered under Criterion D." T18-3

On Page 87 of the appendix, you list that "For these reasons, it's recommended the cultural resources at 45-K1-1473 and 45-K1-1474, and proposed historic districts, be managed as discrete and separate cultural resources."

There is no management of the cultural resource requested by the JACL in the DEIS main body. T18-3

On Page 94 of the appendix you state that "No further cultural resource investigations are recommended prior to the development of planning area one. If in the future this project is planned to occur near 45-K1-1474 and subsurface disturbance will extend six feet below the grade, as it was on the time of the survey, then the DAHP must be consulted regarding potential effects."

Archaeological resources in Washington are protected under the Revised Code of Washington RCW 27.

On Page 45 of your appendix, Figure No. 16, the archaeological and geotechnical survey map shows numbered trenches, but nowhere does it show Trench No. 5. T18-4

Where exactly is Trench 5?

You as a council and administration should know the exact location before proceeding and eliminating the opportunity for proper preservation and recognition.

MR. JOHNSON: So 30 seconds.

CRISTIE COFFING: Do I get five minutes?

MR. JOHNSON: You are at four and a half minutes now.

CRISTIE COFFING: The map on Page 5C of your appendix has the location of the trenches blacked out, so you cannot tell where Trench 5 was, but in summation, it looks like it's under a parking lot, so I don't feel this meets your own criteria for culture and historical preservation, and I believe it's disrespectful to the Japanese American Citizens League, and this is the month of Asian awareness. T18-5

The artifacts found were put back between two pieces of landscape cloth and buried-- reburied below eight foot of grade.

In summation, the DEIS does not address the JACL emergency resolution put forth, and this needs to be rectified. T18-3

Thank you.

MR. JOHNSON: All right. And now you have another person present?

T19

SHARILYN LUX: My name is Sharilyn Lux.

My address is PO Box 277, Snoqualmie, Washington.

I have owned my home in downtown Snoqualmie for 15 years.

I am a teacher, I am a mom, and I am very active in the community, and I'm very familiar with downtown and the conditions of the roads of all of downtown as I've

walked these roads for 15 years.

The traffic study came to my mind first, and I must state before we get to the traffic study, I was extremely disappointed to find that the cover letter that was written by Mark Hofman, in the two pages that were on top of the DEIS, were full of information that contradicts the DEIS, specifically the number of jobs being provided. T19-1

Also, contradicted by the City employee, Mark Hofman, was the amount of land to be preserved within this area.

The amount of land to be preserved is not a small amount of land but a large amount of land to those of who us who care about the land, those of us that live here, that are not here just to develop and cash in on the land.

There is a difference between 65 and 75 percent, and that's about ten percent in Mark Hofman's cover letter than what is in the DEIS.

This is extremely problematic.

I recommend that we get a new DEIS, as much of the information in there seems disingenuous.

In the traffic study I noticed in here that it states that there are shoulders along Mill Pond Road. I walked the entire Mill Pond Road with an attorney a T19-2

week or two ago, and I would like the definition legally for what a shoulder is because to my opinion and to the opinion of an attorney that offers-- within King County, there are no shoulders on Mill Pond Road. T19-3

The reason I bring this up is safety.

It's safety for the 5,000 people that will be headed out to that area to watch concerts. It's children that-- high school students that will be heading out there.

Inevitably some of them will be drunk drivers, they will run out of gas, there will be accidents that happen, and as they approach back to town to look for a ride home, there will be nowhere to walk because I've walked the entire route.

I don't want to happen again what happened on Stone Quarry Road a few years ago when a woman named Lucinda was hit and killed on New Year's Eve.

There's no shoulder on Stone Quarry Road either.

If we remember the death of Lucinda, the woman who died that night, she was killed by somebody here in town. It took several years to find that person, so we cannot move on until we solve the problem with the shoulder on the road, and creating an appropriate road in a wetland area might be nearly impossible. T19-4

Additionally, the peak times that are listed in

here are not accurate. T19-4

The peak times for the high school are around 3:30 p.m. or 3 p.m. In here they're listed between 4 and 6 p.m.

The stop times of the lights are completely inaccurate. I live at the road. As I said, they're just disingenuous. T19-5

Operating a heavy industrial place out there, such as FedEx that's at the Everett mill site that recently opened, would be a large problem. T19-6

The roads are not able to maintain truck traffic.

That's why you're also notice in the traffic study they actually did not include for trucks to turn down Mill Pond Road, so what will happen when one does by accident?

MR. JOHNSON: I will ask you to wrap up.

SHARILYN LUX: The way that this has been delivered to the community during this pandemic, while I am trying to work from home, teach my son, be involved in my community, care for my 100-year-old home and everything else-- so I am hoping also that--

(Time allotted has ran out and mic muted)

MR. JOHNSON: We are trying to wrap up.

I think we have one more person there that was going to speak; is that correct?

MR. HOFMAN: Can we get Greg Balmer?

GREG BALMER: My name is Greg Balmer. T20

I am a downtown Snoqualmie resident.

My address is PO Box 24, Snoqualmie.

I'm a co-owner of the Black Dog Arts Cafe here.

My first comment would be that I believe that we weren't given adequate time to review this complex document that's been given to us. T20-1

The citizens should have a fair opportunity to provide input to this project and give an educated comment to the City.

For me, right now, I don't believe that our current infrastructure can support the added drain required for the building and maintenance of this project. T20-2

I don't think our roads are adequate.

Obviously our sewer system needs an upgrade.

There's a lot of other needs that are going to come down in the future. I don't know who is going to pay for that. I don't know if it's the developer. T20-3

I have heard a good term that "Development should pay for development." I don't know if that's the case here.

It just seems that in the past when there's been

things needed, like additional schools, additional sewer treatment, the current citizens are paying for these things that are needed to support new development. T20-3

I don't really think that's fair.

Lastly, I believe there's a growth plan put out by King County, and this project doesn't seem to fit in with goals in that plan. T20-4

I think that as a good community neighbor to our sister cities in the valley, that we should try to get onboard and be a good teammate and try to be in compliance with the King County plan.

That's all I have tonight.

Thank you very much.

MR. JOHNSON: Thank you.

We also have Christine Iverson Stinson up next, so we'll bring you in, Christine.

There you are.

T21

CHRISTINE IVERSON STINSON: My name is Christine Iverson Stinson.

I live at 6662 405th Avenue SE, and I am just above-- like literally a softball throw to the mill site.

I'm not allowed to vote, which I think is absurd.

I have lived here for 18 years on 13 acres.

I'm an educator.

The traffic study done on Meadowbrook bridge is unacceptable, and it's really a one-lane bridge with a light. T21-1

Everybody else has really hit almost all of-- everything I want to say and touch base on, but I just wanted to make sure that you knew there's somebody else that was raising their hand and had concern, so I got on here.

Also, not enough-- very inadequate time to read this document, which everyone has reiterated a million times. T21-2

The fact that you are unable to record that on your end properly, other than the recording you are taking, obviously states that we need an extension and have a public meeting where things can be heard properly and recorded properly.

That pretty much covers everything that I would like to say.

Thank you.

MR. JOHNSON: Thank you.

Okay. So as I said, we are not taking a second round of comments from people, oral comments here, so we do have two hands up that are people who have spoken before, but I don't have any other commenters in line at this time, so if there's anyone else that has not spoken