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COMMUNITY DEVELOPMENT DEPARTMENT STAFF REPORT TO THE HEARING EXAMINER ON PLANNED COMMERCIAL INDUSTRIAL PLAN APPLICATION, PCI 2017-0001/ SEPA 2017-0003

Snoqualmie Mill Planned Commercial/Industrial Plan Application

SUBJECT

The applicant (Snoqualmie Mill Ventures, LLC [SMV]) is seeking City approval of a Planned Commercial/Industrial (PCI) Plan. The PCI Plan proposes the development of the 261-acre Snoqualmie Mill site in three major phases/planning areas over an approximate 10- to 15-year period. Buildout would include a total of approximately 1.83 million gross square feet (sf) of light industrial/manufacturing, warehouse, office, retail/restaurant, and residential uses. The proposed PCI Plan includes requests for several deviations from development standards in the Zoning Code. The applicant will enter into a development agreement with the City for the project to guide subsequent planning and development of the overall site in accordance with the Snoqualmie Mill PCI Plan.

A. SUMMARY OF PROPOSED ACTION

Snoqualmie Mill Ventures, LLC has applied for a PCI Plan approval to redevelop the former Snoqualmie Mill site located north of downtown Snoqualmie over an approximate 10- to 15-year period. The site has been divided into three distinct areas (planning areas) for purposes of planning and permitting; each planning area generally corresponds to a phase of development, and the amount and detail of information vary among the planning areas.

The PCI Plan application provides detailed information for Planning Area 1, an approximate 102-acre area in the northwestern portion of the site proposed as the first phase of development. Application materials are attached. Exhibit A, attached, provides a table indicating the required information for a PCI application and where to find that information in the application materials. Exhibit B includes the site plans showing the planning areas.

An Environmental Impact Statement (EIS) was prepared for the proposed PCI Plan. The EIS and its technical appendices use the terms Proposal, proposed action, proposed PCI Plan, Snoqualmie Mill Proposal, or proposed project interchangeably. In this Staff Report, the term "the project" is used to refer to the overall project, and "PCI Plan" is used specifically for the requested approval.

Development at buildout would include 1.83 million square feet of commercial, light industrial, warehouse, and office uses; an estimated 3,400 jobs could locate on the site. **Table 1** identifies the mix and amounts of land uses by planning area.

Table 1. Snoqualmie Mill Development Plan – Total Site (Gross Leasable Area/Gross Acres¹)

	Planning Area 1	Planning Area 2	Planning Area 3	
Warehouse/ Manufacturing	280,000 sf	400,000 sf		680,000 sf [37% of gross leasable area]
Light Industrial	120,000 sf			120,000 sf [7%]
Retail/Restaurant²	70,000 sf		25,000 sf	95,000 sf [5%]
Residential (Mixed-Use)³	134,000 sf			134,000 sf [7%]
Office/Campus	--	--	800,000 sf	800,000 sf [44%]
Total	604,000 sf	400,000 sf	825,000 sf	1,829,000 sf
Building Footprint Area (Gross)	11 acres	9 acres	19 acres	39 acres [15% of total site area]
Open Space⁴	69 acres	34 acres	63 acres	166 acres [63%]
Roads/ Other Impervious⁵	22 acres	13 acres	21 acres	56 acres [22%]
Total Area⁶	102 acres	56 acres⁶	103 acres	261 acres

Notes:

¹Numbers are rounded.

²Includes restaurant uses (approximately 15,000 sf), specialty retail (49,000 sf), and indoor event center spaces (31,000 sf).

³Assumes 160 residential units@835 sf located on the 2nd floor through 4th or 5th floors of mixed-use buildings in Planning Area 1. Units would be rental, market rate, in a mix of one- and two-bedroom apartments.

⁴Total open space is comprised of several types and categories: natural open space, which includes wetlands, streams, and their associated buffers; constructed wetlands; undeveloped land used for compensatory flood storage, habitat, trails, and passive open space; and active open spaces including landscaped areas, landscaping within public plazas and lawn areas, small outdoor spaces adjacent to individual buildings, ornamental plantings, and parking area landscaping. Planning Area 1 contains approximately 69 acres of passive and natural open space (including 53 acres subject to a conservation easement) and 5 acres of landscaped open space area.

⁵Includes roads, sidewalks, parking areas, plazas, etc.

⁶The total area of the development plan and Planning Area 2 includes 15.7 acres that are located in the City's Urban Growth Area ("UGA") in unincorporated King County, which will be annexed to the City prior to a development proposal for Planning Area 2. Of the 15.7 acres, 12 acres are identified as open space and 4 acres would be developed for warehouse uses. Refer to Exhibit 2.3-3 of the Final EIS for PCI Plan calculations without the unincorporated parcel.

Planning Area 1 would be developed in the near term and would contain 604,000 sf of development, including 160 residential units in upper floors of mixed-use buildings. Planning Area 1 would contain a mix of light industrial, commercial/retail, warehouse, and residential uses along a pedestrian-oriented main street, and generally focused on the production and storage of wine with supporting retail services such as tasting rooms and restaurants.

Plans for Planning Areas 2 and 3 are still conceptual at this time, but based on current planning, Planning Area 2 would be developed for warehouse and manufacturing uses, and Planning Area 3 for office use.

After full development of the project, approximately two-thirds of the overall site (166 acres, 63%) 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. The development focus would be on the production and storage of wine, including compatible related uses such as tasting rooms, restaurants, and specialty retail shops.

The applicant proposes to enter into a development agreement with the City, as authorized by state law (Revised Code of Washington [RCW] 36.70B.170). In general, the agreement would establish development standards and review procedures applicable to the site. The development agreement will address, among other things, vesting provisions and exemptions from vesting; documentation of mitigation requirements and development conditions that apply to the project; any deviations from Code provisions that are permitted; procedures for future review and revision of the PCI Plan; requirements for additional State Environmental Policy Act (SEPA) review for subsequent phases of development; the term of the agreement; and provisions for specific aspects of the site or development, such as retention of open space, protection and enhancement of wetlands and buffers, road facilities, stormwater, and utilities.

The PCI Plan approval sought is for the overall development plan in the three planning areas at a master plan level, as evaluated in the EIS, with a project-level approval for Planning Area 1. The applicant's objective is to allow the first stage of development to move forward to building permits and construction, recognizing that future phases will need to be more completely detailed before construction can proceed. For Planning Areas 2 and 3, further environmental review may be required, and the master plan would be amended accordingly when the details of those future phases are established.

The applicant also proposes to provide a set of design guidelines that would apply to all development within the project site regarding site layout, architectural character, and environmental standards. The applicant has indicated that the final design guidelines will be prepared after approval of the PCI Plan and will incorporate relevant requirements of that approval.

As allowed by one of the PCI Plan provisions of the Snoqualmie Municipal Code, Section 17.20.050(I), the Proposal includes a request to deviate from some of the development standards that would otherwise apply to the proposed uses, structures, and open space. The deviations would allow development that departs in some manner / degree from the following sections of the City of Snoqualmie Municipal Code (SMC):

- SMC 12.16 - Street design standards (street layout and lighting).
- SMC 17.55.020 - Requirement for conditional use permit for second-story dwelling units above nonresidential uses in PCI zone.
- SMC 17.55.020 - Requirement for conditional use permit for restaurants in PCI zone.
- SMC 17.55.020 - Requirement for conditional use permit for retail restaurants, specifically tasting rooms in PCI zone.
- SMC 17.55.020 - Requirement for conditional use permit for roads, utilities, trails, and accessory parking for commercial, industrial, and residential uses in the OS-2 zone.
- SMC 17.20.040 - Height limits in the PCI zone.
- SMC 19.12.170.I. - Permitted uses and alterations in wetland buffers.

B. GENERAL INFORMATION

Property Owner: Snoqualmie Mill Ventures, LLC
 Applicant: Snoqualmie Mill Ventures, LLC
 Location: Sections 29 and 30, Township 24, Range 8 East, W.M. in King County, Washington. The Snoqualmie Mill PCI Plan contains the following parcels (does not include Mill Pond/Borst Lake properties):

Table 2. Property Parcels included in the Project Site

Ownership	Tax Parcel No.	Size / Acres
Snoqualmie Mill Ventures, LLC	3024089004	38.70 Acres
	2924089009	136.47 Acres*
	3024089001	20.44 Acres
	3024089069	13.54 Acres
	3024089070	2.17 Acres
	2924089022	5.39 Acres
	2924089023	3.66 Acres
	2924089006	40.69 Acres
SUBTOTAL: 261.06** Acres		
<p>*Parcel No. 2924089009 contains approx. 15.7 acres in the City's UGA in unincorporated King County. ** Total area is from King County Assessor records. Actual surveyed site area totals 260.9 acres.</p>		

Zoning: Planned Commercial Industrial (PCI), Open Space (OS-2)
 Shoreline: Floodplain Conservancy and Urban Conservancy
 Existing Use: Storage, office/classroom building, and commercial buildings; King County Landmark (tall brick stack); driving instruction school (Ultimate Rally LLC, d/b/a DirtFish Rally School); vehicle maintenance; equipment and parts storage; storage of wood recycling materials; production and storage of topsoil for local construction projects; beehive operation; temporary construction staging; and truck storage
 Proposed Use: Mixed-use commercial-industrial center with multi-family residential development
 Site Size: 261.06 acres
 Water Supply: City of Snoqualmie
 Sewage Disposal: City of Snoqualmie Sewer

C. ANNEXATION HISTORY

The City and SMV entered into a Pre-Annexation Agreement in 2011. By Ordinance No. 1086 adopted on October 24, 2011, the City adopted pre-annexation zoning designations (Planned Commercial / Industrial, Planned Residential, and for the Mill site property). By adoption of Ordinance No. 1098, the property was annexed to the City in September, 2012, at which time the pre-annexation zoning designations became immediately effective. A Post Annexation Implementation Plan, required by the City's Comprehensive Plan, was approved by the City in 2016.

D. ENVIRONMENTAL CONSIDERATIONS

Draft and Final Environmental Impact Statements for the Snoqualmie Mill Site PCI Plan were issued on April 27, 2020, and December 9, 2021, respectively. This environmental review identified and analyzed probable, significant adverse environmental impacts of the proposed PCI Plan, and identified potential mitigation measures for those impacts. The EIS includes the following areas of analysis: Earth; Noise; Aesthetics/Light & Glare; Air Quality/Greenhouse Gases; Land & Shoreline Use; Parks & Recreation; Water Resources; Plans, Policies, & Regulations; Transportation; Plants & Animals; Population, Housing, & Employment; Public Services; Environmental Health; Historic & Cultural Resources; Utilities; and Fiscal/Economic Impacts.

The project site contains several areas designated as geologic "critical areas" under the Snoqualmie Municipal Code, including erosion, landslide, steep slope, seismic, channel migration, and flood hazard areas. The entire site is within the 100-year floodplain of the Snoqualmie River. The western portion contains both a channel migration zone and a portion of the floodway. The site also contains critical aquifer recharge areas and numerous wetlands.

The project site lies within the shoreline jurisdiction of the Snoqualmie River and Borst Lake. The shorelines are designated Urban Conservancy and Urban Floodplain Shoreline Environments in the City of Snoqualmie Shoreline Master Program.

The overall Snoqualmie Mill site is considered to be a "brownfield" site, with some contamination remaining after a century of industrial use and more than a decade of cleanup activities. The applicant plans to complete remediation of the Snoqualmie Mill site under the Washington State Model Toxics Control Act (MTCA) in conjunction with development. Planning Area 1 was historically used for log storage, not for industrial processes, and no contamination has been identified on that portion of the PCI Plan site.

E. PHYSICAL DESCRIPTION OF PROPOSAL AND SITE

The site is a large tract of land that was previously used as a lumber mill, and still contains multiple remaining mill structures. Vegetation is limited on most of the site. The site is currently used in part as an off-road driving instruction school by DirtFish Rally School, which uses paved and unpaved roads, primarily in the central portion of the site. Other business activities include the storage of wood recycling materials, production and storage of topsoil for local construction projects, a beehive operation, temporary construction staging, and truck storage. An approximate 15-acre area in the northeastern portion of the site (Planning Area 2) remains within unincorporated King County; it contains a former boiler plant and undeveloped area.

The Proposal would redevelop the site in phases into a mixed-use commercial and industrial area with up to 160 residential units in mixed-use buildings. A Site Plan is presented in Exhibit B.

F. NEIGHBORHOOD CHARACTERISTICS

The project site is adjacent to the northwestern city limit of Snoqualmie, Washington, in the Planned Commercial/Industrial (PCI) zone. It is bounded by the city limits on the north, Borst Lake (Mill Pond) on the south, Mill Pond Road on the west, and the "hillside" area owned by King County along 396th Drive SE on the east. Other nearby features and uses include the Snoqualmie River to the west, and the City's wastewater treatment plant, a storage yard, and a gravel mining operation to the north (see Exhibit B, Vicinity Map). Snoqualmie Falls is approximately one-third of a mile to the northwest of the site, and downtown Snoqualmie is across the river to the southwest of the site.

G. APPLICABLE CITY STATUTES/CODES

Title 12 Streets, Sidewalks and Public Places (street design)

Title 17 Zoning (numerous sections)

Title 19 Environment (SEPA, Shorelines, and Critical Areas)

Future development of the site will also require water and sewer availability; grading, building, and other permits from the City; and applicable state and federal permits.

H. FINDINGS OF FACT

The following findings describe the permit procedures, the PCI Plan approval criteria, and the results of the SEPA EIS analysis. The SEPA EIS findings include or reference recommended conditions to be applied to the PCI Plan approval to facilitate compliance.

Permit Procedures

1. The applicant submitted the application for PCI Plan approval on March 22, 2017. The City determined the application complete on April 17, 2017.
2. A combined notice of application, determination of significance, and scoping notice was published in May 2017; a scoping meeting to receive comments on the scope of the EIS was held at City Hall that same month. The Notice of Application and Notice of Scoping for the project was published in the Snoqualmie Valley Record, posted in two places near the site, and mailed to owners within 500 feet of the property and agencies that typically receive SEPA notices, and posted on the City website, per the requirements of SMC 14.30.060.C. The scoping summary is attached as Exhibit E.
3. A Draft EIS was published on April 27, 2020. Notice of Draft EIS Availability was published in the same manner as the Notice of Scoping, plus it was published in the Seattle Times, mailed or emailed notice to parties (67 persons) who commented or expressed interest in the project, and mailed to all property owners within 1,250 feet. The wider notification was in recognition that the 500-foot mailing reached only five property owners, of which the City was one. The Community Development Director determined that, although providing notice to owners within 1,250 feet exceeded the requirements of the City code, the more extensive notice would better fulfill the intent of the code under the circumstances. With the agreement of applicant SMV, the initial 45-day comment period was extended until July 10, in response to requests for additional review time. A virtual public meeting was held on May 20, 2020 to receive verbal comments on the Draft EIS.
4. A Final EIS was published on December 17, 2021. Notice of Availability was published in the same manner as the Draft EIS, with the addition of any parties who had commented of the Draft EIS or

expressed interest in the project. The Notice indicated that an appeal of the adequacy of the EIS could be filed through December 23, 2021.

5. An appeal of the adequacy of Final EIS was filed on December 22, 2021 by Snoqualmie Community Action Network.
6. The applicant submitted an updated application for a PCI Plan on March 18, 2022 (see Exhibit B).
7. A public hearing before the Hearing Examiner is scheduled to commence on Wednesday, March 30, 2022 at 4:00 p.m., and to continue during the week of April 4. As required by City Code and the Washington Department of Ecology's (Ecology) SEPA regulations, the Hearing will include both the open public meeting on the PCI Plan and a hearing on the appeal of the EIS.
8. In her Order Ruling on Prehearing Motions issued on March 9, 2022, the Hearing Examiner dismissed certain appeal issues and limited the scope of others, as set forth in the Order.

PCI Plan Approval

9. The project site is a 261-acre site suitably located for construction of a mixed-use commercial/industrial development. The project would convert a portion of the former Weyerhaeuser mill into a mixed-use commercial/industrial development. The project site is suitably sized to provide sufficient parking and other infrastructure necessary to support the project, and the site is located in close proximity to City water and wastewater treatment facilities that will serve the project. The Proposal would protect and enhance critical areas on the site. In addition, portions of the project site are contaminated with hazardous materials from the historic use of the site as a lumber mill. The project will conform to all applicable requirements of state law (Model Toxics Control Act) to ensure these materials are safely abated, removed, or otherwise addressed.
10. The applicant seeks authorization for the PCI Plan, including deviations from certain Code requirements, and a development agreement for the project. The proposed development agreement will guide subsequent planning and development of the overall site according to a Master Plan. Applications for building permits and other required development approvals will be submitted following approval of the PCI Plan. All future site development, mitigation, and construction elements are subject to the applicable sections of the Snoqualmie Municipal Code and will be addressed through the applicable permit processes.
11. SMC 17.55.020 Table 1 lists the allowable, conditional, and prohibited uses for each zoning district in the City.
12. The Proposal lies primarily within the Planned Commercial/Industrial zoning district (PCI). Proposed uses in the PCI-zoned portions of the site include Light Industrial/Manufacturing, Warehouse, and Office uses, which are permitted uses, and Restaurants and Second Story Multi-Family Dwelling Units above Nonresidential Uses, which are listed as conditional uses in the PCI district. A portion of the site is within the Open Space 2 (OS-2) district. Uses proposed for this area include Open Space and Recreational uses and Commercial Parking, which are permitted uses in the OS-2 district.
13. PCI Plan approval is governed by SMC 17.20.050, which lists criteria that should guide the Hearing Examiner in making a decision on this PCI Plan application. The purpose of a planned commercial / industrial district is set forth in 17.20.050(A), and criteria applicable to a PCI Plan application are set forth in subsections (B) – (H) and (J) – (K), as follows:

B. In the planned commercial/industrial district, no land shall be used, subdivided,

cleared, graded or filled and no building or structure shall be constructed, altered or enlarged on a parcel of two acres or larger except under the authority of an approved plan pursuant to this section; provided, an approval under this section shall not be required for road and utility corridors, or for temporary uses and structures for which no grading, clearing or building permit is required. The approved plan shall authorize development on land which is not to be further divided and shall provide the basis and standards for processing of a binding site improvement plan or subdivision on land which is to be further divided for sale or lease of lots, parcels or pads.

C. On parcels in the planned commercial/industrial district of less than two acres, permitted uses shall be as specified for the business-general (B-G) district.

D. In the event two or more contiguous parcels in common ownership lie in whole or part in both the district subject to the provisions of this section and the planned residential district subject to the requirements of Chapter 17.15 SMC, the owner may optionally elect to present one plan for all parcels, and the location of the residential and commercial/industrial uses thereon need not adhere strictly to the boundaries of each respective district so long as the minimum requirements for uses in each district respectively are met in the overall plan. Additional adjacent property with zoning designations other than PCI and PR [Planned Residential] may be included, provided they constitute no more than 15 percent of the total acreage of the proposal.

E. The planned/commercial industrial district allows and encourages a mix of uses, both vertically and horizontally, but does not require such a mixture.

F. Tracts included in a development proposal in a planned commercial/industrial district must be in one ownership or control or be the subject of a joint application by owners of all of the property included.

G. At least 35 percent of the total acreage for the development proposal must be dedicated to open space, natural areas, parks, or greens, commons or public assembly areas; provided, for projects subject to the provisions of subsection D of this section, the common open space may be provided within the area subject to the plan as a whole.

H. Proposed circulation, solid waste disposal and recycling, and water, sewer and stormwater management systems shall be designed in such a manner to allow adequate and efficient expansion to accommodate development which can reasonably be anticipated on adjacent or nearby lands.

I. The application shall include all of the materials required for a planned unit development pursuant to SMC 17.50.090(B), together with the following information, together with a list of all development standards of general applicability from which a deviation is proposed, and a statement of how such deviation will achieve the purpose set forth in subsection A of this section.

J. The notice, hearing and decision process for applications for approval of a plan for development in the planned commercial/industrial district shall be as set forth in Chapter 17.50 SMC, Planned Unit Development Regulations.

14. Deviations from several development standards are proposed with this PCI Plan, as allowed under SMC 17.20.050.I. Deviations may be approved when the City Council, with the advice of the Hearing

Examiner, finds that such deviation would advance the purpose of the Planned Commercial / Industrial zoning district as set forth in SMC Section 17.20.050(A). The applicant has included the deviations to development standards listed below, as part of the PCI Plan application:

- SMC Ch. 12.16 – Street design standards roadway layout and lighting;
- SMC 17.55.020 – Requirement for conditional use permit for second-story dwelling units above nonresidential uses in PCI zone;
- SMC 17.55.020 – Requirement for conditional use permit for restaurants in PCI zone;
- SMC 17.55.020 – Requirement for conditional use permit for retail restaurants, specifically tasting rooms in PCI zone;
- SMC 17.55.020 – Allowing uses in the OS-2 zone that are not specifically listed as permitted uses in the Code;
- SMC 17.55.040 – Height limits; and SMC 19.12.170.I – Permitted uses and alterations in wetland buffers.

15. Exhibit A lists the required elements of an application require in SMC 17.20.050.J, and indicates pages numbers where they can be found in the application materials for this project.
16. Deviations are a typical part of the approval process for large master-planned projects in the City of Snoqualmie. Deviations were incorporated as part of the Mixed Use Final Plan approvals for Snoqualmie Ridge I and Snoqualmie Ridge II, as well as for the Salish Lodge & Spa Expansion Planned Commercial/Industrial and Planned Residential Plan. See SMC 17.30.070I (allowing deviations as part of Mixed Used Final Plan); Resolution No. 420 (approving SR I MUFP at Condition 6); Resolution No. 427 (clarifying Conditions 3 and 6 of SR I MUFP); Resolution No. 712 (approving SR II Development Agreement at Ex. A, Att. B, Condition No. 2.4); Snoqualmie Ridge Development Standards Section 1.80 (Changes to Standards); SMC Section 17.15.050(G) and 17.20.050(I); and Resolution No. 1461, Ex. A (Findings of Fact, Conclusions of Law and Conditions, at Conclusions 10, 12, 14, 21 (approving deviation from height limit), 33, and 43).
17. This PCI Plan application has followed the notice, hearing, and decision process set forth in SMC 17.50.

PCI Plan – Proposed Deviations from Development Standards

Street Design Deviations (SMC 12.16) – Roadway Layout

18. The applicant has requested deviations from street design standards in SMC Ch. 12.16 – Street design standards for street layout. Specifically, the applicant requests approval of the conceptual road layouts for three roads in the PCI Plan, shown on sheet SP-3 of the plan set in Exhibit B. **Table 3** indicates the road section and the specific aspects of the road section that deviate from the standard.

Table 3. Requested Deviations from Road Standards

Roadway and Classification	Cross Section	Proposed Deviation	Required Standard to Meet Code
Mill Pond Road – Neighborhood Collector	Section A- A	Roundabout intersection with Mill Street entrance to project (results in wider road right-of-way, but maintains lane widths)	Neighborhood Collector T-intersection with Mill Street entrance to project
Mill Pond Road – Neighborhood Collector	Section B-B	7-foot-wide sidewalk and 7-foot-wide planter strip on one (east) side only, south of roundabout	7-foot-wide sidewalk and 7-foot wide planter strip both sides
Mill Street – Local Access	Section C-C	<ul style="list-style-type: none"> • 8-foot- and 12-foot-wide sidewalks both sides • No planter strips • Angle Parking both sides with 62 feet of paving width to accommodate 2 travel lanes (11 feet each) and 20 feet each side for angle parking 	<ul style="list-style-type: none"> • 6-foot-wide sidewalk and 5-foot wide planter strip both sides • Parallel Parking one side • Minimum 28 feet of pavement width
Mill Street – Local Access	Section D-D	<ul style="list-style-type: none"> • 12-foot- and 20-foot-wide sidewalks both sides • No planter strips • Angle Parking both sides with 62 feet of pavement width to accommodate 2 travel lanes (11 feet each) and 20 feet each side for angle parking 	<ul style="list-style-type: none"> • 6-foot wide sidewalk and 5-foot wide planter strip both sides • Parallel Parking one side • Minimum 28 feet of pavement width

19. City Code (SMC 12.16.230) recognizes that deviations from street design standards may be necessary on projects that have special or limiting requirements, and emphasizes that each project will be considered on an individual basis.
20. Mill Pond Road in its current configuration is within the shoreline environment and channel migration zone of the Snoqualmie River. Based on geotechnical analysis and investigation, geotechnical soil instabilities exist in the fill and subsurface soils on which the existing road prism was constructed. The proposed realignment of Mill Pond Road, as shown on PCI Plan Application Plan Sheet SP-3 (Exhibit B), shifts a portion of Mill Pond Road to the east away from the Snoqualmie River and aligns a roundabout intersection with the proposed project entrance, known as Mill Street, in Planning Area 1.
21. Realigning and constructing a new portion of Mill Pond Road as proposed requires that portion of the roadway to be brought to current standards for a Neighborhood Collector. The proposed alignment meets those standards, with the exception of the proposed roundabout at Mill Street.
22. The roundabout would provide the gateway entrance into the Mill Street village retail and commercial area. The roundabout would also provide better traffic circulation than would otherwise be provided by a standard T-Intersection otherwise called for by the Neighborhood Collector standards.

23. By realigning the Mill Pond Road, additional area next to the Snoqualmie River is proposed to be restored through removal of the retired portion of the road and replanting to establish forest vegetation. Allowing the deviation for sidewalk and planter strip, by omitting sidewalk and planter strip on the west side and providing sidewalk and planter strip on the east side of Mill Pond Road only, south of the proposed roundabout, would reduce the overall impervious surface footprint of Mill Pond Road, and contribute to enhancing the shoreline environment. Because there is no development between the river and the road and there would be a marked crosswalk north of the roundabout to allow pedestrians to cross from the east side of Mill Pond Road to reach the other (west) side of the road, the absence of this section of sidewalk would not adversely affect safety.
24. The deviation to street design standards proposed for Mill Street includes wider sidewalks and pedestrian walkways. No planting strips are proposed, which allows for wider walking area. A wider road cross-section is proposed to allow angled parking.
25. The wider sidewalks and angled parking on both sides of Mill Street would facilitate vehicle access and pedestrian circulation within the mixed-use retail and residential area. During heavy use periods standard 6-foot sidewalks would likely be inadequate. Angled parking is appropriate for a street that encourages slower speeds for vehicles and prioritizes pedestrian use of the right-of-way. The integration of these design concepts contributes to the 'sense of place' focused on the proposed tasting rooms/wine stores and outdoor equipment sales and promotes accessibility to the pedestrian-oriented village center for visitors, residents, and employees.
26. Street trees and landscaping elements are proposed provided intermittently along the sidewalks along Mill Street. A condition is recommended to include tree type and spacing in the design guidelines.
27. For the reasons identified in Findings of Fact #19 through #26 above, the proposed deviations from street standards will achieve the purpose of the Planned Commercial / Industrial district because the deviations further an overall street design plan that provides for imaginative, well-designed, master-planned commercial/industrial development containing compatible and complementary uses while also minimizing environmental impacts. The deviation will also optimize the efficient use of land, and promote safe pedestrian circulation. In addition, for the same reasons, the proposed deviation from roadway layout street standards would not adversely affect the public health, safety, or the environment.

Street Design Deviations (SMC 12.16) – Street Lighting

28. The applicant has requested deviations from street design standards in SMC Ch. 12.16 - Street design standards for street lighting. Although lighting requirements are not listed in the Code, the City utilizes the Snoqualmie Ridge II Development Standards ("SRIIDS") for street lighting. The applicant requests that a deviation to the SRIIDS be granted to allow for the development of a lighting plan concept/strategy specific to the Snoqualmie Mill PCI Plan. The lighting plan has not yet been developed, but will be included as part of the design guidelines for the project. As proposed, all lighting would comply with the performance standards for all development to prevent glare impacts on adjacent property. The proposed deviation from street design lighting standards, to allow for Mill site-specific lighting standards that incorporate "Dark Sky" standards, will achieve the purpose of the Planned Commercial / Industrial district, to provide for imaginative, well-designed, master-planned commercial/industrial development containing compatible and complementary uses.

Allowed Use Deviations (SMC 17.55.020) – Second-story dwelling units

29. The applicant has requested a deviation from the requirement in SMC 17.55.020 that a conditional use permit is required for second-story dwelling units above nonresidential uses in the PCI zone. The deviation requested would be limited to the Proposal for up to 160 apartment units in the upper stories of mixed-use buildings in Planning Area 1. These units would be developed in accordance with the design guidelines for the project, which will be finalized after the PCI Plan is approved. The requested deviation would allow that the proposed residential uses would not be subject to a separate conditional use permitting process, but would not change any other requirements for residential development.
30. The purpose of a conditional use permit for residences in the PCI district is to provide a review and approval process by which the City can examine whether there would be any incompatibility between the residences and the commercial and industrial uses, in a zone where commercial and industrial are the most common types of uses, and to mitigate impacts (if any) arising from any incompatibility.
31. The EIS for the project and the PCI Plan review process have provided the City with an opportunity to thoroughly examine and mitigate potential incompatibility between proposed residential uses and other commercial or industrial uses, equivalent or greater to a conditional use permit process under SMC 17.55.030. And, although design information about specific buildings has not yet been provided, the EIS determined that air quality and noise impacts from adjacent commercial and industrial activity would not adversely affect the proposed residential uses.
32. The performance standards in SMC 17.55.080 require that off-site uses be protected from impacts from a project, including from dust, odors, vibration, heat, noise, and other impacts potentially associated with light industrial/manufacturing activities. However, because the residential uses proposed in Planning Area 1 would not be on separate properties from the commercial and industrial uses, these Code provisions would not apply to the proposed PCI Plan residential uses.
33. The intent of the project is to create a mixed-use development where all uses are compatible, and the applicant has proposed that design guidelines for the project would be developed to ensure compatibility. As such, the proposed deviation to allow as permitted outright the second-story residential uses above commercial is consistent with the purpose of the Planned Commercial / Industrial district; it optimizes efficient use of land, while maintaining small-town character in an imaginative, well-designed, master-planned commercial/industrial development.

Allowed Use Deviations (SMC 17.55.020) –Restaurants and tasting rooms

34. The applicant has requested a deviation from the requirement in SMC 17.55.020 that a conditional use permit be required for restaurants in the PCI zone, whether as stand-alone restaurants or as combined restaurant / tasting rooms associated with wine-making operations. The deviation requested applies to any restaurants in the project. Any restaurants would be developed in accordance with the design guidelines for the project, which have not been finalized but would be after the PCI Plan is approved. The requested deviation would allow that any proposed restaurant uses, including tasting rooms, would not be subject to the permitting process required for conditional uses, but would not change any other requirements for restaurant development.
35. As provided in SMC 17.55.030, the purpose of a conditional use permit for restaurants in the PCI district is that it provides the City a review and approval process by which to examine whether there would be any incompatibility between the restaurants and other commercial or industrial uses, in a

zone where commercial and industrial are the most common types of uses, and to mitigate any impacts from potential incompatibility.

36. The EIS for the project and the PCI Plan review process have provided the City with an opportunity to thoroughly examine and mitigate potential incompatibility between proposed restaurants and other commercial or industrial uses, equivalent or greater to a conditional use permit process under SMC 17.55.030.
37. With the condition recommended above to include provisions protecting residential uses on the site, restaurants would not adversely affect any uses within the project. By facilitating compatible restaurant and tasting room development, the proposed deviation would be consistent with the purpose of the PCI district, optimizing efficient use of land with a mix of uses in a well-designed master planned development.

Allowed Use Deviations (SMC 17.55.020) – Allowing uses not specifically listed in the Code

38. SMC 17.55.020 Table 1 indicates that only a very limited range of uses are allowed in the OS-2 zone, and those that are allowed are uses generally associated with open space and therefore unlikely to adversely affect other uses in that zone. Only three types of uses are permitted outright: Parks and Open Space, Community Gardens, and Commercial/Municipal Parking.
39. The proposed stormwater outlet is not a public utility but is more similar to that use than any other use in SMC 17.55.020 Table 1. As such, absent a deviation the stormwater outlet could be considered a public utility use otherwise subject to the requirement for a conditional use permit.
40. As provided in SMC 17.55.030, the purpose of a conditional use permit process for non-open space or park uses in the PCI district is to provide the City a review and approval process by which to examine whether the proposed use would adversely affect other uses in the zone, where the predominant uses are parks and open space.
41. The EIS for the project and the PCI Plan review process have provided the City with an opportunity to thoroughly examine and mitigate potential impacts of the aspects of the PCI Plan that would affect the OS-2 zone, equivalent or greater to a conditional use permit process under SMC 17.55.030.
42. The EIS identifies potential mitigation measures that would mitigate impacts from the stormwater outfall. These include measures to prevent erosion, protect water resources, and ensure the proper design of utility systems, which are listed in the recommended conditions of approval; in particular, see Conditions #11, #13, #19, #43, and #45 in Section J (Staff Recommendation). By facilitating the road relocation and stormwater outfall, the proposed deviation would be consistent with the purpose of the PCI district, optimizing efficient use of land and the opportunity for public open space and trails in a well-designed master planned development.
43. The applicant initially requested deviations for other uses in the OS-2 zone. Trails and commercial parking were determined by the Acting Community Development Director to be permitted uses and did not require the deviation sought. The roadway would be relocated and new right-of-way dedicated. Public roads are not regulated by Title 17; therefore, a deviation is not required.

Height Limit Deviations (SMC 17.55.040) – Increased height limits

44. The applicant has requested a deviation from the requirement in SMC 17.55.040 – building height limits for buildings in the PCI zone. The height limit in the PCI district is 40 feet.
45. The Proposal is to construct buildings abutting Mill Street in Planning Area 1 with gabled roofs that would be similar in architectural form and height to the Planer building, which is one of the buildings from the former Snoqualmie Mill that remains on the site. The three Mixed-Use/Residential buildings abutting Mill Street would be limited to a maximum height of 70 feet to the ridgeline of the roof and 55 feet to the eave line. All other buildings abutting Mill Street could be built to a maximum of 55 feet to the ridgeline and 35 feet to the eave line. Other buildings in Planning Area 1, and any new buildings in Planning Areas 2 and 3 could have flat or shed type roofs and would be limited to 55 feet maximum height including parapets or other rooftop appurtenances. All heights are measured from average finished grade, as is standard practice under SMC Title 17.
46. The purposes of the deviation are to accommodate the needs of a variety of potential industrial and manufacturing users, to allow flexibility in the design of the mixed-use buildings, and to support proposed residential density by allowing more upper-story space for residential uses, which assists in achieving one of the stated purposes of the PCI district (residential stories over commercial). The proposed deviation sought is consistent with the range of height maximums approved for the Salish Expansion hotel in the Salish PCI / PR plan (75-foot height limitation approved in Amended and Restated Development Agreement, proposed 60-foot height maximum approved in PCI Plan height deviation).
47. Section 2.3.2 of the Final EIS includes a description of the mixed-use buildings in Planning Area 1 as “up to five stories in height (60 feet measured to the mid-point of the roof, 70 feet to the peak), of wood frame construction over a concrete podium.” The view simulations, which were developed for the Draft EIS were constructed using these height assumptions, show that the impacts on visual character of the surrounding area and on scenic viewpoints would be minimal and did not find any significant adverse impacts. Because the site is relatively isolated, development on it would be minimally visible from some viewpoints and not visible from others, provided the proposed perimeter plantings are installed.
48. The proposed deviation from the PCI district maximum height achieves the purposes of the PCI district. Allowing the approximately 55-foot height facilitates a mixed-use project with residential stories above commercial, optimizes the efficiency of the use of land, keeps the buildings at scale which serves to maintain existing small-town character, and optimizes the opportunity for public amenities provided by the project in the form of open space and trails.

Wetland Buffer Deviations (SMC 19.12.170.I) – Permitted uses and alterations in wetland buffers

49. The applicant has requested a deviation from requirements in SMC 19.12.170.I, which regulates uses and alterations in wetland buffers. Specifically, the applicant requests a deviation from minimum buffer dimensions and maximum buffer reduction dimensions for buffer averaging as defined in SMC 19.12.170.I. - Table 19.12.170-1. Wetland Buffers. The deviation would apply to the buffers for Wetland 12 and Wetland 28, both of which are in Planning Area 1.
50. The requested deviation would authorize the wetland buffer reductions, restoration, and enhancement as generally described and depicted in the Snoqualmie Mill PCI Plan Final EIS and

March 2022 application materials, including the plans (Exhibit B). The deviation is sought to provide flexibility in site design while still providing adequate buffers for all wetlands.

51. The standard buffer for Wetland 12 and for Wetland 28 is 165 feet. SMC 19.12.090(B)(3) would allow this to be reduced by 25% for a drainage facility, provided that:

...wetland functions will be preserved or enhanced, that stormwater discharges meet the requirements in Chapter 15.18 SMC, that stormwater discharges to the wetland's outer buffer will not negatively affect the hydroperiod of the wetland except as allowed by SMC 15.18.180, and that there will be no adverse impacts to the water quality of the wetland;...

52. The deviation is requested because the minimum buffer width allowed by the Code with buffer averaging is 123.75 feet (25% reduction), and the proposal is to allow a buffer as narrow as 16.4 feet on Wetland 12 and 85.8 feet on Wetland 28. The narrowed buffer widths result from the project's utilization of a constructed stormwater wetland within what would otherwise be wetland buffers. Both of these buffer reductions would be in Planning Area 1.
53. Although the minimum width would be narrower than typically allowed, the project would provide wetland buffers in Planning Area 1 that average approximately 175 feet wide overall.
54. Existing buffers for all wetlands within Planning Area 1 are degraded at varying levels, and it is unlikely that the existing on-site wetland buffers within Planning Area 1 or the existing 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 on-site wetlands or the Snoqualmie River.
55. Wetland 12 is a ditched wetland system with limited habitat functions, bordered along much of its length by the existing haul road that will remain.
56. The majority of the wetland buffer proposed for Wetland 12 would be reduced in width on average by approximately 36%, averaging 105 feet in width. The maximum reduction would be 90% of the standard buffer (buffer width 16.4 feet) in a location where the buffer would separate the wetland from a proposed stormwater wetland facility located east of Lot 4 in the northeast portion of Planning Area 1. See Draft EIS Exhibit 3.4-9. Although the stormwater wetland would be an open space use, SMC 19.12.170.I does not allow such facilities in wetland buffers.
57. 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 with Borst Lake and the Snoqualmie River. The proposed habitat linkage with the Wetland 12 buffer would not be provided by applying the standard 165-foot wetland buffer width.
58. The northern portion of the buffer for Wetland 28 would be reduced, allowing for the southern edge of the parking area in Planning Area 1. The maximum reduction would be approximately 48% of the standard buffer (buffer width 85.8 feet). See Draft EIS Exhibit 3.4-9. As noted for Wetland 12, compensatory buffer for proposed buffer loss would be provided as a large block of habitat linking Wetland 28 with other wetlands within Planning Area 1, Borst Lake, and the Snoqualmie River.
59. The project would provide buffers that average approximately 175 feet in width for all wetlands within Planning Area 1. According to the Wetlands, Wildlife, and Fisheries Assessment (Appendix C of

the Draft EIS), the project would result in a substantial improvement of buffer functions and protection of wetland resources.

60. The deviation from wetland buffer standards would achieve the purposes of the PCI district, because the deviations optimize efficient use of land and opportunities for public amenities such as wetland and wetland buffer restoration, open space, trails, and appropriate stormwater management.

State Environmental Policy Act Review

61. The EIS prepared for the project identified impacts and mitigation measures expected from the project. The following findings briefly discuss each element reviewed in the EIS, and recommend appropriate mitigation measures. Some mitigation measures are identified as part of the project, some would be required for permits, and others are discretionary. All are discussed in the Draft and Final EIS in greater detail. All mitigation measures listed in this Staff Report are recommended as conditions of PCI Plan approval.
62. There was one change to the PCI Plan Proposal description between the Draft EIS and the Final EIS. The maximum height for three mixed-use buildings along Mill Street was changed from 55 feet to 70 feet at the ridgeline. However, this was an error only in the Draft EIS project description; the Aesthetics analysis in the Draft EIS addressed the 70-foot heights, including in the view simulations.

Earth

63. A portion of the site along the southwestern edges of Planning Area 1 and within Planning Area 3 lies within the zone where the river could change course, known as a Channel Migration Zone (CMZ), designated in City Code as a Moderate CMZ on adopted City maps. The proposed relocation of a portion of Mill Pond Road and drainage discharge improvements, both of which are in Planning Area 1, are the only aspects of the project that would occur within the CMZ. Utilities and transportation facilities are allowed within the Moderate CMZ when no other feasible alternative exists. Mill Pond Road already exists within the CMZ, and the proposed relocation would move the road farther away from the Snoqualmie River. Alternative access, e.g., from the existing privately owned haul road, is not feasible because the road is not public and because such access would result in wetland impacts (Wetland 12; see Findings of Fact #87 below). The proposed drainage discharge is a discharge to the Snoqualmie River, so the discharge must be located within the CMZ in order to accomplish its purpose. Construction of both the Mill Pond Road relocation and drainage discharge provide the opportunity for enhancement of the existing, degraded river buffer in the vicinity of the project site.
64. Removal of the soil storage pile as part of future development of Planning Area 3 would remove a potential steep slope hazard.
65. Development on the project site would be subject to the following codes and regulations, which provide mitigation for the identified impacts:
- The 2015 International Building Code (IBC), as adopted by the City of Snoqualmie in Chapter 15.04A.010 of the Snoqualmie Municipal Code.
 - The City of Snoqualmie Critical Areas regulations as established in Chapter 19.12.100 (erosion hazards), Chapter 19.12.110 (landslide hazards), 19.12.120 (steep slope hazards), Chapter 19.12.130 (seismic hazards), and Chapter 19.12.140 (channel migration zones) of the Snoqualmie Municipal Code.
66. These regulations would prevent any significant impacts. Based on recommendations by the geotechnical engineer that informed the analysis in the EIS, several conditions are recommended to

ensure that all earth-related impacts are addressed during design, permitting, and construction. These are included as recommended conditions. See Conditions #12 through #15 in Section J (Staff Recommendation).

Air Quality and Greenhouse Gases (GHG)

67. The EIS evaluated impacts on air quality during construction and operation of the project. Construction contractors would be required to comply with air quality and dust control regulations; with such controls in place, these activities would not significantly affect air quality in the project vicinity. Requiring the use of best practices during construction would further ensure that the project would not have off-site impacts. A condition is recommended to incorporate a list of best practices in the requirements for contractors. See Condition #16 in Section J (Staff Recommendation).
68. Construction equipment and material hauling could affect traffic flow in 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. Although there could be short-term periods with increased congestion and increased vehicle emissions, such events would likely be the exception rather than the rule, and significant adverse impacts on air quality are unlikely.
69. Modeling results for air quality related to traffic indicate that carbon monoxide (CO) concentrations near the most congested intersection in the project study area would be far less than the 35 parts per million (ppm) 1-hour and 9 ppm 8-hour health-based ambient air quality standards. Future traffic volumes and delays would increase over existing conditions, but future CO concentrations are assumed to decline due to the adoption of newer, more efficient vehicles and cleaner fuel regulations. Modeled CO concentrations for the proposed PCI Plan in 2023 and 2032 are the same or a maximum of 0.1 ppm higher than the No Action Alternative, indicating that the Proposal would not cause or contribute to any significant traffic-related air quality impacts. Air emissions associated with the production, storage, transport, and sale of wine or similar products are expected to be minimal. One or more emergency generators may be required to ensure safe and consistent operation of the project. Emissions associated with emergency generators result from the combustion of fossil fuels and would occur during temporary emergency use or routine testing of the generators.
70. In addition to the "criteria" air pollutants like CO, there are a variety of other potentially hazardous air pollutants for which health-based ambient air quality standards have not been established, including mobile source air toxics (MSATs). MSATs are emitted by on-road and off-road vehicles with internal combustion engines burning biofuels, diesel, or gasoline. The traffic impact analysis indicates that a total of 13,504 daily passenger and truck trips would result due to the Proposal, which is far below the 140,000–150,000 annual average daily traffic (AADT) threshold that the Federal Highway Administration (FHWA) indicates may result in a higher potential for MSAT effects.
71. The EIS estimates that the project would produce about 2,071,972 metric tons (tonnes) of carbon dioxide (CO₂) equivalent (MTCO₂e) over the lifespan of the structures, assuming typical structures under current building and energy codes. Annually, this corresponds to about 32,490 tonnes. The project's annual GHG emissions represent approximately 0.03% of estimated annual 2013 GHG emissions within Washington. "Green" building technologies can further reduce this small effect.
72. As part of the proposed PCI Plan, the applicant indicated that the design guidelines will establish a goal of Leadership in Energy and Environmental Design (LEED) Gold or Platinum certification to achieve energy efficiency (to be included in the design guidelines).

73. A condition is recommended that the project include in its design guidelines a commitment to green building technologies that achieve a minimum of LEED Gold certification, and that building permit applications for individual buildings be accompanied with documentation that the specific building has applied for such certification. See Condition #17 in Section J (Staff Recommendation).

Water Resources

74. The EIS evaluated multiple topics relating to water resources: surface water, groundwater, stormwater, water quality, and flooding. The analysis was based on hydraulic and hydrologic modeling of the Snoqualmie River and on-site wetlands (drainage patterns and hydrology).
75. Development of the PCI Plan in Planning Area 1 would increase the effective impervious area on the site by 5.13 acres and reduce coverage of pervious surfaces by 22.84 acres, including wooded areas. As a result, 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.
76. 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 on 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.
77. Critical aquifer recharge areas (CARAs) that underlie the Snoqualmie Mill site are concentrated in the western and northern portions of the site, with some moderate-susceptibility areas in the southwestern corner of the site near Borst Lake. As a result, the groundwater impacts described above would have a lower potential to occur in Planning Areas 2 and 3 than in Planning Area 1.
78. Basic stormwater treatment is required for any runoff that discharges directly to the Snoqualmie River. Development runoff from impervious surfaces that drain to any on-site or off-site wetlands or streams before discharging to the Snoqualmie River would be provided with enhanced treatment.
79. Potential water quality impacts from treated stormwater discharged into the Snoqualmie River would be predominately related to warmer temperatures of stormwater runoff from developed surfaces compared with river temperatures. 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.
80. Development of the PCI Plan would entail filling portions of the site within the floodplain; compensatory flood storage would be excavated elsewhere on site to ensure no net rise in base flood elevation. Development of the PCI Plan would result in a net increase in available flood storage capacity on the site of 14.7 acre-feet. This would be accomplished by:
- Lowering grades of existing berms for the construction of the relocated Mill Pond Road.
 - Significantly lowering grades of existing berms along the north margin of Planning Area 1.
 - Constructing stormwater wetlands for stormwater treatment.

81. Incorporated features of the Proposal that would limit impacts on water resources associated with development include the following:
- Maintaining 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 promote groundwater recharge.
 - Utilizing stormwater wetlands for water quality treatment and dispersion, where feasible, to promote wildlife habitat and groundwater recharge.
 - Maintaining hydrology to surface water-dependent wetlands consistent with the 2016 King County Surface Water Design Manual (KCSWDM) Guide Sheet 3B.
 - Providing compensatory flood storage in excess of existing flood storage across the site to ensure a zero-rise impact on 100-year flood elevations.
 - Creating 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 damage to property or roadways in future flood conditions.
82. Implementation of the PCI Plan would be designed to be consistent with the following regulatory frameworks:
- Appendix I of the Western Washington Phase II Municipal Stormwater Permit.
 - Appendix I-E of the 2012/2014 Stormwater Manual for Western Washington.
 - The City of Snoqualmie Addendum to the 2016 KCSWDM, the 2016 KCSWDM, and City of Snoqualmie Flood Hazard Regulations (SMC 15.12).
 - Snoqualmie Municipal Code Chapter 19.12.200, which regulates uses within CARAs that have the potential to result in groundwater contamination.
83. With the measures incorporated into the project and compliance with the regulations listed, no significant adverse impacts are expected on water resources. Conditions are recommended to ensure that all phases of the development minimize impacts on water resources. See Conditions #18 and #19 in Section J (Staff Recommendation).

Plants and Animals

84. The EIS evaluates impacts on plants and animals, specifically on wetlands, streams, and fish and wildlife, including wildlife habitat. It documents current conditions on the site and potential adverse and beneficial effects of the project on the functions and values of each of these critical areas.
85. The existing buffers for wetlands and for the Snoqualmie River within Planning Area 1 provide a low level of protection of wetland and stream functions due to poorly developed or absent vegetative cover, the presence of non-native invasive species, and gravel and paved roads or other impervious surfaces consisting of compact gravel fill. Areas where young forest occurs have an understory that is sparsely vegetated or dominated by non-native, invasive Himalayan blackberry.
86. The project incorporates numerous planning and design features that would avoid, minimize, or otherwise mitigate most potential impacts. The project would also enhance, restore, and augment the currently degraded buffers.
87. The project would avoid direct impacts on all wetlands and jurisdictional watercourses within Planning Area 1. To avoid direct wetland impacts on Wetland 12 which abuts the haul road, primary access from Mill Pond Road to Planning Area 1 would be via a new "Mill Street." The Mill Street

entrance would be an expansion of an existing entrance into Planning Area 1, and avoids the need to widen the haul road, which would be necessary if it was used as the primary entrance.

88. All wetlands and streams within Planning Area 1 would be retained and provided with buffers that provide substantially greater protection than under current conditions. A detailed mitigation and monitoring plan for impacts on critical area buffers will be prepared based on the conceptual mitigation approach outlined in the PCI Plan. Impacted wetland and stream buffers will be enhanced pursuant to the plan and result in an overall increase in wetland buffer area, both for Planning Area 1 and for the site as a whole.
89. Areas targeted for development within Planning Areas 2 and 3 focus on portions of the site that have been previously developed or disturbed and currently consist of buildings, fill material, pavement, or gravel surface. Wetlands and buffers would be retained as open space areas.
90. The project incorporates several design features and other measures to protect wetlands and jurisdictional watercourses and fish and wildlife habitat both during and after construction. These include:
 - The limits of wetland and stream buffer areas will be clearly marked on construction plans and on-site to prevent unauthorized damage to critical areas during construction.
 - Construction limits, including staging areas, will be clearly marked in the field prior to beginning construction activities.
 - To the extent feasible, construction staging areas will be located outside of wetland and stream buffers to minimize impacts on vegetation.
 - A permanent stormwater management system will be designed and installed according to the Master Drainage Plan for the site prepared by Goldsmith Land Development Services (2020), which is based on the standards of the 2016 KCSWDM, which is equivalent to the 2012/2014 *Department of Ecology Stormwater Manual for Western Washington* (Ecology Manual).
 - During construction, stormwater runoff will be treated according to a City of Snoqualmie-approved Stormwater Pollution Prevention Plan (SWPPP) for the project, which will meet standards of the 2016 KCSWDM, prior to discharge into on-site streams or wetlands.
 - Appropriate best management practices (BMPs) and temporary erosion and sediment control (TESC) measures will be implemented in accordance with the approved SWPPP, including specific measures to prevent and control spills of pollutants, and to handle, control, and store potential contaminants.
 - Wetland and stream buffer areas temporarily disturbed for construction access and staging will be revegetated with a mixture of native plant species following the completion of construction activities.
 - Containment tarps or netting will be used when working over water to retain fallen materials.
 - Covenants, guidelines, and educational materials will be established to prevent the introduction of noxious weeds or invasive species into landscaped areas, both common areas and individual lots.
91. Under the PCI Plan, even with the deviations requested, all the wetlands and streams within Planning Area 1 would be retained. Much of the existing wetland buffer areas are non-functional and degraded, and would be replaced with native forest buffers through buffer restoration and enhancement in exchange for focused buffer intrusions, consistent with requirements of SMC 19.12.170 H.2 and SMC 19.12.170 H.6.
92. City of Snoqualmie critical area regulations (SMC 19.12) require compensatory mitigation for any proposed wetland loss or alteration of buffers. Direct wetland impacts would be avoided under the

Proposal, but buffers for on-site wetlands and the Snoqualmie River would be impacted. A mitigation plan for impacts on critical areas is an element of the proposed PCI Plan, as required by City regulations (SMC 19.12.090.F). The general approach to buffer mitigation is described further below and is focused on Planning Area 1 at this time; a specific plan would be submitted at the time of building permit application. The plan would be updated to address Planning Areas 2 and 3 in the future, as those areas are planned in greater detail.

93. All existing impervious surface areas, including paved and gravel roadways and areas of compact gravel fill within the wetland buffers, will be removed and replaced with a minimum of 12 inches of topsoil amended with compost prior to re-planting. These areas include portions of the buffer for Wetlands 12, 28, and 29, as well as in the location where a portion of Mill Pond Road will be retired along the Snoqualmie River (see Exhibit 3.4-9 and Exhibit 3.4-11 in the Draft EIS).
94. Site grading to provide compensatory flood storage will necessitate the removal of a steeply sided berm on which forested buffer for Wetland 12 is present along the north perimeter of Planning Area 1. Grading of this area will result in shallower slopes that are more uniform and conducive to dispersion of runoff within the proposed 105-foot average buffer width provided to Wetland 12. Grading to remove old fill within other portions of the buffers for Wetlands 12, 28, and 29 may be necessary to provide additional compensatory flood storage or for site development. Any of these areas considered as mitigation for buffer impacts also will receive a minimum of 12 inches of topsoil amended with compost following the removal of old fill.
95. Following site grading and installation of topsoil/compost mix, the entirety of the wetland buffers within Planning Area 1 would be restored or enhanced with a mix of native trees, shrubs, and herbaceous vegetation common to the Snoqualmie Valley. In total, approximately 19.5 acres of buffers for wetlands and the Snoqualmie River will be restored or enhanced. Areas that have been graded and are bare of vegetation will be planted at densities that are typical for buffer restoration (9 feet on-center for trees and 6 feet on-center for shrubs and herbaceous species). Areas that retain some cover by young trees will be planted with supplemental coniferous trees, as needed, to create a closed forest canopy. Non-native, invasive species within the existing, treed portions of the wetland buffers will be removed, and supplemental shrub and herbaceous understory species will be planted.
96. Conversion of degraded buffers to a forested condition with a high density and diversity of species and structure would substantially improve water quality and habitat values. The enhanced and restored wetland buffers will be designed to be a low-maintenance, self-sustaining community resembling native forest habitats typical of the Puget Sound lowlands.
97. Impact minimization measures implemented to protect wetland and stream resources will also serve to protect fish and wildlife resources. Compensatory mitigation of proposed wetland buffer impacts will be provided in accordance with City of Snoqualmie requirements. Buffer areas within Planning Area 1 to be cleared and graded to provide compensatory flood storage will be revegetated with native forest plantings.
98. The provision of a bottomless culvert under the realigned portion of SE Mill Pond Road to allow for passage of floodwaters may also provide an avenue of movement for small mammals, carnivores, and amphibians between the project site and habitats associated with the Snoqualmie River.
99. In addition to the wetland and stream buffer mitigation described above, compensation for the anticipated loss of forest vegetation within the regulatory floodplain will be provided by the installation of native trees within appropriate areas of the floodway upon completion of grading to provide compensatory flood storage along with development of each planning area. In the future,

together with the retained wetlands and buffers, the enhanced and restored areas will form a large open space corridor within the central part of the project site. Compensatory plantings will be provided on at least a 1:1 basis. Detailed mitigation plans, as required by the City of Snoqualmie (SMC 19.12), will be developed for review and approval prior to the issuance of building permits for each planning area.

100. Proposed project development will be consistent with City of Snoqualmie development guidelines for construction within the floodplain, including Ch. 15.12 (Flood Hazard Regulations) and Ch. 19.12 (Critical Areas). The site will be graded to result in no net rise in the base flood elevation, with new distributions of sub-basins draining stormwater to the Snoqualmie River and to Borst Lake, and new distributions of impervious areas.
101. No listed salmonid species exist in the Snoqualmie River adjacent to the site because it is above Snoqualmie Falls, so potential impacts, if any, on the floodplain from the project on listed salmonids would only occur as a result of the transmission of any effects downstream to below the Falls; however, these will be minimized or otherwise mitigated by design measures and compensatory habitat enhancement.
102. A Federal Emergency Management Agency (FEMA) Floodplain Habitat Assessment will be submitted as part of implementing permit approvals through the City for all phases, particularly Phases 2 and 3, which do not yet have the specific plans for stormwater and buffer enhancements that have been prepared for Planning Area 1. Such specific plans will be required in future detailed planning for Planning Areas 2 and 3.
103. The City is following a course of phased environmental review for the Snoqualmie Mill PCI Plan; wildlife concerns are expected to be re-evaluated and specified in greater detail when planning for Planning Areas 2 and 3 is more advanced and when impacts and mitigation measures can be identified with greater accuracy. As noted in Section 6.4 of Draft EIS Appendix C, more specific enhancement plans for the central corridor would be developed for review, along with development plans and environmental analyses for Planning Areas 2 and 3.
104. A condition is recommended to ensure that an environmental analysis of wildlife impacts is conducted on more detailed plans for development of Planning Areas 2 and 3 prior to issuance of building permits for those areas. See Condition #20 in Section J (Staff Recommendation).

Environmental Health

105. Draft EIS Section 3.5 – Environmental Health summarizes the environmental history of the Snoqualmie Mill property and additional research and technical evaluations performed by Farallon Consulting, L.L.C. to identify the nature and extent of existing contamination. The EIS section describes the proposed approach and strategy for further investigation and cleanup of the Snoqualmie Mill property in conjunction with future redevelopment. The analysis is based on a variety of historical sources, including (but not limited to) previous environmental reports for the property; documents obtained from federal, state, and local environmental agencies and fire departments; King County property records; Snoqualmie Valley Historical Society records; documents obtained from the Weyerhaeuser Company; and historic aerial photography.
106. The project would elevate portions of the Snoqualmie Mill property above the base flood elevation and therefore reduce the risk of the storage and use of hazardous substances within the floodplain.

107. Additional analysis of soils and groundwater affecting Planning Area 1 was conducted for the Final EIS in 2020 and 2021. The investigation and analysis identified contaminants exceeding MTCA cleanup levels (arsenic, gasoline-range organics, diesel-range organics, and oil-range organics). The analysis found that the arsenic concentrations were likely representative of naturally occurring background conditions or possibly from an upgradient source in groundwater, and the petroleum hydrocarbon concentrations were predominantly related to naturally occurring biogenic material.
108. The groundwater analytical results for two monitoring well pairs installed on the eastern perimeter of Planning Area 1, adjacent to Planning Areas 2 and 3, demonstrate that contaminated groundwater is not migrating into Planning Area 1 from Planning Area 2 or 3.
109. Construction activities in Planning Area 1 would not disturb contaminated areas in Planning Areas 2 or 3. As with any development activity, there is some potential for accidental spills or releases of fuels or other substances. Similarly, there is a risk of vehicle collisions and spillage of fuels during construction and operation.
110. Although specific uses for each building in the project are not known with certainty at this time, direct, indirect, and cumulative risks of spills, fire, or explosion are considered possible but low or unlikely, given the regulatory requirements for proper handling of materials.
111. Cleanup and remediation of legacy contamination in Planning Areas 2 and 3 would occur in conjunction with development of these areas under the Proposal; development would ultimately result in a net improvement of environmental conditions. This cleanup strategy is common for "brownfield" sites like the Snoqualmie Mill. Commercial and industrial development in Planning Areas 2 and 3 would carry the same risk of direct, indirect, or cumulative accidental release or fire described for Planning Area 1.
112. In August 2021, Ecology conducted a Site Hazard Assessment of the Snoqualmie Mill cleanup site. A Site Hazard Assessment is a standard part of Ecology's regulatory process under MTCA. The purpose of the Site Hazard Assessment is to gather information and basic site-specific environmental data to assess and rank the site relative to other assessed sites in Washington on a scale from 1 to 5, where 1 is the highest relative concern and 5 is the lowest. Ecology assigned the Snoqualmie Mill cleanup site a ranking of 1. The ranking does not require any action or change the overall investigation and cleanup approach, and reaffirms that the cleanup site will be addressed through Ecology's regulatory process irrespective of the applicant's development plans.
113. To protect the safety of workers and other persons occupying or visiting the Snoqualmie Mill property during construction of buildings and infrastructure in Planning Areas 2 and 3 where contamination is present, and during cleanup activities that precede construction, all work is required to comply with Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA) health and safety requirements for hazardous waste operations (29 Code of Federal Regulations [CFR] 1910.120; Washington Administrative Code [WAC] 296-843, respectively).
114. To ensure that cleanup procedures required under MTCA have been established prior to issuance of grading or building permits for a specific planning area, and to minimize other potential risks to environmental health, a condition is recommended requiring several mitigation measures; see Condition #21 in Section J (Staff Recommendation). Mitigation measures recommended for Traffic and Transportation would also reduce the risk of spills, fire, and explosion related to vehicle accidents.

Land and Shoreline Use

115. Draft EIS Section 3.6 – Land and Shoreline Use evaluates land use patterns, levels of activity, land use compatibility, and consistency of the PCI Plan with adopted land use and shoreline plans and regulations. The section reviews potential land use impacts of the project considering the following land use topics:
- The change in intensity, character, and activity on site and along shorelines.
 - The compatibility of the project with current land uses on adjacent properties.
116. Most of the project site has no current developed land use, but much of the site was disturbed by previous development. Much of the site was extensively used for nearly a century as the Weyerhaeuser Snoqualmie Mill. Current, existing uses include the DirtFish Rally School and outdoor storage.
117. The Post-Annexation Implementation Plan (AIP) provides information about current land uses and the anticipated transition to future land uses. It reinforces the applicability of PCI and Open Space-2 zone uses and provides a Planning Area Overview Exhibit that shows areas of development, conservation, and phasing. The PCI Plan application is intended to fulfil the requirements of the Post-Annexation Implementation Plan.
118. The project would redevelop a dormant brownfield site and create a mixed-use master planned development containing residential, retail, industrial, office, and open space uses. Planning Area 1 would integrate planned uses along a pedestrian-oriented main street; 160 housing units would be constructed in mixed-use buildings. On-site activity would increase substantially with the addition of daily employment (3,410 jobs) and residential use, as well as customer/tourism visits to planned retail and restaurant uses. These changes would not be significant or adverse impacts.
119. The project would be compatible with existing and planned uses in the vicinity. The project would be partially visible from the future Snoqualmie Valley Trail to the east. While there is some contrast in uses between the PCI Plan, there is another industrial use to the north of the site, and the contrast in intensity of use between the rural area the project site is similar to what has existed historically, both when the Weyerhaeuser mill operated and when the existing rally school is operating. The change in land use proposed with the project has been planned since the site was annexed and is not an adverse impact on existing and planned land uses in the vicinity.
120. The project includes an open space strategy that focuses development into approximately one-third of the site area and separates it from other uses to the north, and the river and lake to the south. As proposed, approximately 68% of open space would be maintained and enhanced and would include:
- **Natural Open Spaces** – Sensitive area wetlands and streams, buffers, regraded and revegetated buffers; stormwater management (treatment) areas; and floodplain management (compensatory flood storage) areas.
 - **Landscape and Active Open Spaces** – Public spaces and landscaped areas incorporated into the site design including public plazas, public open spaces, green areas, commons areas, grassy areas, and active/passive trails through the natural open spaces.
121. Portions of the site near the Snoqualmie River and Borst Lake are regulated as shorelines under the City's Shoreline Master Program (SMP). The shoreline use environment designations in the SMP

function as zoning overlays and promote shoreline uses, public access, and environmental conservation consistent with the Shoreline Management Act (SMA). The Urban Floodplain designation applies to the portion of the Snoqualmie Mill site within 200 feet of the floodway; and the Urban Conservancy designation applies to the area encompassing the floodway.

122. Open space would be retained along the southern portion of the site, closest to the river. The area adjacent to the proposed stormwater outfall would be enhanced with landscaping, and pedestrian improvements would be constructed along the re-aligned portion of Mill Pond Road. Along the west, in Planning Area 1, shoreline uses would be more intense, changing from cleared areas formerly used for log storage to more formal roads, parking, and buildings containing light industrial, retail, and live-work units. Proposed uses are consistent with applicable shoreline designations in the City's updated, adopted, and approved SMP. Shoreline permits will be required for development in the shoreline jurisdiction, and the project is required to comply with all development and uses standards in the shoreline.
123. The PCI Plan application proposes to develop Covenants, Conditions, and Restrictions (CC&Rs) and to adopt design guidelines and a design review process that would address land use, site planning, and design, prior to submittal and City review of building permit applications. The design guidelines would address the following: permitted uses; site planning and design; dimensional requirements, including building height, lot coverage, and setbacks; architectural design; building materials; off-street parking; landscaping; lighting; signage; outdoor storage; and operational performance standards (e.g., to control noise and other emissions).

Housing, Population, and Employment

124. The EIS evaluated Housing, Population, and Employment. The project would accommodate population growth of approximately 304 persons and job growth of approximately 3,410 employees by 2032. Population and employment growth are not adverse environmental impacts in themselves. The increases in population, housing, and employment associated with the project are consistent with growth anticipated by the City.

Aesthetics, Light, and Glare

125. Draft EIS Section 3.9 – Aesthetics, Light, and Glare evaluates aesthetic and visual impacts, including changes in visual character, effects on views, light and glare, and shading conditions. The analysis reviews on-site conditions, major visual landmarks in the vicinity, local topography, and vegetation conditions. Twelve viewpoints were analyzed, and the Draft EIS simulated views of the site from the six locations: Snoqualmie Valley Trail, Sandy Cove Park, Snoqualmie Falls/Snoqualmie River, Borst Lake, the Snoqualmie Casino, and Mount Si. In addition to views of the Snoqualmie Mill site from exterior locations, the EIS also addressed views of major scenic resources from the Snoqualmie Mill site itself, specifically Mount Si and the Cascade foothills.
126. The site is clearly visible from Borst Lake. Members of the public using the Lake will be exposed to views of the site.
127. Nearly two-thirds of the overall site would remain in open space and see a substantial increase in tree cover and native plantings as part of wetland buffer restoration. This open space, along with the site's existing perimeter vegetation, would create a visual buffer around the developed portion of the site and reduce the potential for the public or adjacent properties and developments to see into the site or to experience adverse height and bulk or light and glare impacts from the project.

128. Building heights proposed under the PCI Plan would be similar to many industrial buildings associated with the site's history, with most buildings extending to no more than 55 feet in height, and three mixed-use buildings extending to no more than 55 at the eaves and 70 feet at the ridgeline. Building heights would be similar to the building heights approved in 2018 for the Salish Lodge & Spa expansion
129. Within Planning Area 1, the visual character would change from undeveloped to urban. However, as described in the EIS, the proposed development style employs industrial design elements across proposed land use categories, evoking the site's history, and integrates vegetation and open space into the urban design of the village. Elements and echoes of the site's rural and industrial visual character would be retained. Planned building layout would also preserve an on-site view corridor focused on the Mill Planer building and Mount Si.
130. Development in Planning Areas 2 and 3 would primarily be visible from locations at elevations higher than the Snoqualmie Mill site and far enough away to see over the surrounding screen of vegetation, such as the Snoqualmie Casino, located approximately 1.5 miles southwest of the project site.
131. Develop of the project would not obstruct views of Mount Si, southeast of the Snoqualmie Mill site, which is the primary scenic landmark visible from Planning Area 1. New development in Planning Area 1 would not interfere with views from nearby important scenic or cultural landmarks, including Sandy Cove Park, Snoqualmie Falls/Snoqualmie River, Borst Lake, and the Snoqualmie Casino.
132. The site currently has very little exterior lighting. Development of the project would add new buildings to a site that is largely undeveloped, which would necessitate the addition of exterior illumination. New roads, parking, and on-site circulation would require the installation of streetlights and other forms of artificial lighting.
133. Light and glare impacts associated with development under the PCI Plan would be moderated by the presence of heavy vegetation along the site perimeter, as well as topographic changes to the east and north.
134. The design guidelines proposed for the project will establish design concepts, design standards, and a pre-application architectural review process for all on-site development. The design standards will address site planning, architectural design, building materials, landscaping, signage, lighting, and other design features, including:
- Site design standards that encourage integration of open space and natural features with development, including landscaping with native species, to reduce the visual effect of increased development intensity on the site.
 - Standards for pedestrian environments that require the provision of street plantings and pedestrian amenities.
 - Design standards that identify on-site view corridors, particularly those encompassing Mount Si and historic structures on the site, such as the Planer building and the Powerhouse smokestack, and require that the placement of future buildings and trees minimize disruption of these views.
135. A condition is recommended to ensure that the design guidelines are submitted and approved prior to application for building permits for Planning Area 1. Because detailed plans for Planning Areas 2 and 3 will be developed later, it should be recognized that the design guidelines for those areas may need to be amended. The condition should also require that the guidelines be amended prior to application for building permits in Planning Areas 2 and 3, to provide an equivalent level of

detail as is provided for Planning Area 1. Additional environmental review may be required at that time, depending on those specific plans. See Condition #22 in Section J (Staff Recommendation). A condition is recommended requiring the Community Development Director to determine substantial conformance with the PCI Plan and design guidelines prior to issuance of building permits for Planning Areas 1–3. See Conditions #2–3 in Section J (Staff Recommendation).

136. A condition is recommended to require that exterior lighting comply with standards as promulgated by the International Dark-Sky Association and that these standards be integrated into the design guidelines for the project. See Condition #23 in Section J (Staff Recommendation).

Historic and Cultural Resources

137. Draft EIS Section 3.10 – Historic and Cultural Resources addresses cultural resources listed in or eligible for listing in a heritage register, located within the project site, and an area 1 mile downstream (Snoqualmie Falls).
138. Archival research, consultations, and field surveys formed the basis for the identification of cultural resources, and whether a cultural resource met federal, state, or local criteria for listing in a heritage register.
139. Planning Area 1 contains one archaeological resource (SF-CR#2) that is considered eligible for listing on state or federal registers of historic properties, but no adverse impacts on the resource are anticipated from development in Planning Area 1. The resource is domestic debris associated with the former living quarters of Japanese residents of the Snoqualmie Falls Lumber Company town that occupied a portion of the site at one time.
140. Planning Areas 2 and 3 contain three buildings (including Crane Shed No. 3, Planing Mill-Crane Shed, and the Package Lumber Shed) and a site (Mill Site Historic District) that are considered eligible for listing on state or federal registers of historic properties. Six buildings or structures, which are not considered eligible for listing individually, are considered to contribute to the historic integrity of a potential historic district (referred to as the Snoqualmie Falls Lumber Company historic district), encompassing a portion of the eastern side of the property (Planning Area 3).
141. The PCI Plan proposes to retain and reuse two existing historic buildings (the Powerhouse, which is a King County designated landmark, and the Planer building), provided that retention and reuse are economically feasible. Other buildings and structures, many of which are decayed, would be removed.
142. Development of the Proposal would not directly affect Snoqualmie Falls, a Traditional Cultural Property (TCP).
143. Several conditions are recommended to ensure that historic and cultural resources are adequately protected during and after construction of the project. See Conditions #24 through #34 in Section J (Staff Recommendation).

Traffic and Transportation

144. Draft EIS Section 3.11 – Transportation describes existing transportation conditions in the vicinity of the Snoqualmie Mill site, including the existing roadway network, existing traffic volumes, existing Level of Service (LOS) at 23 roadway intersections, and existing site access and circulation. The transportation analysis estimates future (2023 and 2032) vehicle trip distribution for the project and

evaluates the resulting impacts to the local transportation network, including trip volumes and resulting intersection LOS. The analysis also addresses potential effects on transit service and traffic safety in the vicinity of the Snoqualmie Mill site.

145. A portion of Mill Pond Road would be realigned to the north and a roundabout added at the entrance to Planning Area 1. A portion of Mill Pond Road would also be abandoned as the new entry road segment is completed; some portions would be converted to a pedestrian trail and restored habitat.

146. With the development of Planning Areas 2 and 3, the project would include the following roadway improvements:

- Additional internal roadway connections between the three planning areas to allow on-site circulation for vehicles, trucks, and non-motorized uses.
- Access to a new east-west private road traversing the site and connecting to Planning Area 3 via a new intersection with SE Mill Pond Road.
- Use of the existing private haul road north of the site to provide access for heavy trucks to service industrial and warehouse uses in Planning Area 2.

147. 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. Pedestrian and other frontage improvements are not proposed on this road, given that the road is private and will primarily be used by truck traffic, and given the environmental constraints.

148. The interchange of SR 18/Snoqualmie Parkway with I-90 currently operates at LOS F during the AM Peak Hour, and both construction and operational traffic from the project would contribute additional trips through this intersection. Washington State Department of Transportation (WSDOT) has plans and funding to improve the intersection to an acceptable level of service. Based on updated information from WSDOT and delays associated with the COVID-19 pandemic, the planned improvement to the I-90 interchange is expected to be completed in 2025. Construction of Planning Area 1 is planned to be completed as early as late 2023, and the completed project's traffic would contribute 100 AM peak hour trips to this interchange. Therefore, Planning Area 1 could add to existing congestion for a limited period, until the improvement is completed. Due to its limited duration, this potential impact is not considered significant.

149. Construction of the project would generate truck and other construction-related traffic that could affect adjacent streets. A condition is recommended to ensure that construction traffic is managed to minimize these impacts. See Condition #35 in Section J (Staff Recommendation).

150. After development of Planning Area 1, operation of the project would result in increased truck and passenger vehicle trips, increasing vehicle traffic and congestion on nearby roads. Planning Area 1 would produce 5,768 new weekday daily trips, including 357 new AM peak hour trips and 459 new PM peak hour trips. Planning Area 1 would also produce 5,780 new Saturday daily trips.

151. In 2023, development of Planning Area 1 would not result in the failure of any studied intersection to meet City LOS standards. However, the EIS notes that the side-street approaches to the intersection of Fisher Avenue SE and Snoqualmie Parkway are anticipated to operate at LOS F during the AM and PM peak hours, with or without implementation of the Proposal. A condition is recommended to address its impact. See Condition #38 in Section J (Staff Recommendation).

152. Planning Areas 2 and 3 would have greater impacts on traffic patterns, and a number of intersections would fail to meet City LOS standards by 2032. Full buildout of the PCI Plan would result in a total of 13,504 new weekday daily trips, including 1,213 new AM peak hour trips and 1,462 new PM peak hour trips. Saturday daily trips would increase by 9,861 trips.
153. Under full buildout of the PCI Plan in 2032, the following intersections would fail to meet City LOS standards (LOS D) without improvements:
- The side-street approaches at the intersection of Fisher Avenue SE / Snoqualmie Parkway are anticipated to operate at LOS F during the AM and PM peak hours, with or without development of the PCI Plan.
 - The northbound approach at the unsignalized Orchard Avenue SE / Snoqualmie Parkway intersection is anticipated to operate at LOS F during the AM peak hour.
 - The southbound approach at the unsignalized Allman Avenue SE / Snoqualmie Parkway intersection is anticipated to operate at LOS E during the PM peak hour.
 - The single-lane roundabout intersection at Tokul Road SE / SR 202 / SE Mill Pond Road is anticipated to operate at LOS F during the AM and PM peak hours with the PCI Plan at full buildout. The existing roundabout is sufficient to support development of Planning Area 1, but development of Planning Area 3 (anticipated in 2032) would require widening to allow two circulating lanes. The two-lane roundabout would need to be coordinated with the City's planned future four-lane bridge to the south, which is included in the City's 6-year Transportation Improvement Plan (TIP).
 - The intersection of Meadowbrook Way SE / Park Street is expected to operate at LOS E during the AM peak hour.
 - The side-street left-turn at the Meadowbrook Way SE / SE North Bend Way intersection is expected to operate at LOS E during the PM peak hour.
 - The westbound movement at the intersection of SE Mill Pond Road / private haul road would operate at LOS F during the PM peak hour. This intersection will need to be upgraded to a roundabout to mitigate project impacts.
154. Improvements to these intersections would bring operations at them to acceptable level of service. A condition is recommended to require re-examination of potential impacts when Planning Areas 2 and 3 are developed, to establish a fair share of cost to be collected from the project. A condition is also recommended to incorporate bicycle racks, and participate in programs to reduce commuter vehicle trips to and from the project site. See Conditions #36 and #37, respectively, in Section J (Staff Recommendation).
155. The updated project application indicates a provision of 1,114 parking spaces in Planning Area 1, which exceeds the requirements of 1,050 spaces. See Exhibit B, Page IV-32. The provision of parking in Planning Areas 2 and 3 is not known at this time.

Noise

156. Draft EIS Section 3.12 – Noise evaluates the potential of the Proposal to generate additional sound perceptible to people in and around the proposed development area. The EIS section describes existing noise sources and levels, and forecasts future conditions based on anticipated increases in vehicle traffic generated by future development. Noise generated by construction activities and project operations was also considered.
157. During construction, there would be temporary increases in sound levels at locations near active construction areas and along routes to these areas from heavy equipment and the hauling of

construction materials. The increase in noise levels would depend on the type(s) of equipment being used and the amount of time it is in use. Excavation, grading, and construction would generate sound audible on surrounding properties and completed portions of the phased development.

158. Noise from construction activity, as received at nearby off-site receivers, as well as received at on-site noise-sensitive receivers present during later construction phases, may at times exceed the existing ambient levels, and may be perceived as an annoyance. However, City Code allows noise from construction activities between 7 a.m. and 8 p.m., Monday through Friday; between 8 a.m. and 8 p.m. on Saturday; and between 9 a.m. and 8 p.m. on Sunday. Therefore, although some daytime construction activities may be audible and perceived as an annoyance, noise from such activities is permitted during daytime hours.
159. During operation, noise-generating features of the Proposal, including stationary equipment (rooftop ventilation units, HVAC systems, etc.) and on-site truck and passenger vehicle traffic, would create ongoing noise. Noise related to restaurants, tasting rooms, retail sales, wine-making and other light industrial activities would occur within enclosed buildings and would not affect nearby residential uses.
160. Most people cannot detect changes in noise of less than 3 dBA in active outdoor environments, 5-dBA changes would likely be perceived by most people under normal listening conditions.
161. Noise emissions from operation of the project at full buildout would be lower than established City and King County sound level limits. Compared to existing conditions, development of the Proposal would result in an increase of up to 2 A-weighted decibels (dBA) over AM peak hour sound levels at the nearest off-site residential receiver. Humans generally cannot detect an increase in noise less than 3 dBA in active outdoor environments. Therefore, the project-related noise increase is unlikely to be perceptible.
162. Traffic from the project would cause a small increase in off-site noise levels. Existing AM-peak period sound levels near most project-affected roadways are estimated between 63 and 68 dBA. During operation of the project, traffic noise would increase over No Action levels in both 2023 and 2032 by 1–2 dBA at nearby sensitive receptors. Therefore, it is likely that most people would not perceive the changes in traffic noise resulting from the proposed PCI Plan.

Parks

163. Per the City's Comprehensive Plan and the Pre-Annexation Agreement, the Snoqualmie Mill project must plan for and commit to provide trail rights-of-way to connect local and regional trails, specifically the Riverwalk Route and missing Snoqualmie Valley Trail link. The PCI Plan provides land for both trails through continued planning and consultation with the City of Snoqualmie and King County; the exact location of the River Walk Route will be determined as mutually agreed upon by the property owners and the City, and the exact location of the missing Snoqualmie Valley Trail link will be determined as mutually agreed upon by the property owners, the City, and King County Parks Department.
164. The PCI Plan also includes an integrated trail system throughout the entire site to meet resident and on-site employee demands. The trails will include passive and active recreation opportunities for visitors and future employees. Several initial segments of Snoqualmie Mill's planned trail system would be constructed in Planning Area 1 and would provide pedestrian connections to the future trail system planned in the central open space area, and to future development in Planning Areas 2 and 3. Most pedestrian activity in Planning Area 1 would be focused on sidewalks along Mill Street in the

mixed-use village center. Trails and sidewalks would also be provided along the realigned portion of Mill Pond Road.

165. The City of Snoqualmie's Municipal Code requires development within the PCI district to set aside at least 35% of the total acreage for open space, natural areas, parks, or green and common areas (SMC 17.20.050 (G)). Under the PCI Plan, approximately 63% of the overall site would be open space (166 of 261 acres). In Planning Area 1, development is proposed on approximately one-third of the planning area (33 acres), with two-thirds retained as open space (69 acres). Large natural open spaces and wetland conservation areas would be located north and south of the developed area, with additional landscaped open spaces integrated into the planning area.

Public Services

166. Draft EIS Section 3.14 – Public Services evaluates potential impacts of the project on police, fire, and school services in Snoqualmie, which are provided by the Snoqualmie Police Department, Snoqualmie Fire Department, and the Snoqualmie Valley School District, respectively.
167. The Proposal would result in more residents and employees and the potential for more calls for police service. About 0.35 full-time equivalent (FTE) staff would be necessary to maintain the Police Department's current effective level of service (i.e., the city-wide ratio of officers to population), but Police Department staff indicates at least one additional full-time officer would be necessary. In addition to demand for police service from population growth, the commercial, winery, and entertainment uses would attract visitors to the site and could also increase calls for service.
168. While development of the PCI Plan would create demand for fire services, the Snoqualmie Fire Department currently has excess staff and expects to be able to handle the additional demand for fire response personnel. Development of the PCI Plan would also increase demand for fire code permit review and fire code inspections. Development of the PCI Plan with deviations from height standards may require the ability for a fire ladder truck response, which would also be available to serve certain existing buildings (Panorama Apartments, Snoqualmie Inn hotel, and Mt. Si high school). Current ladder truck response is available through a mutual aid agreement from the Cities of Issaquah and Bellevue. A condition is recommended for the project to contribute a proportionate share of the cost of a fire ladder truck.
169. Development under the PCI Plan would be primarily commercial and industrial in nature; residential uses make up a relatively small portion of the development. Based on student generation rates established by Snoqualmie Valley School District, the additional housing units at the Snoqualmie Mill site would generate approximately 28 additional students. For comparison, baseline growth for the City of Snoqualmie through 2032 would generate approximately 730 students.

Utilities

170. The EIS analysis of utilities is based on information contained in the Master Drainage Plan (MDP), which is included in Appendix A of the Draft EIS, and in the City's adopted Water and Wastewater System Plans and 2021 updates thereto. The analysis identifies the current and planned capacity of City utility infrastructure systems and estimates the additional demand that would be created by development of the proposed PCI Plan.
171. The PCI Plan application estimates total potable water demand of the project would be approximately 799 Equivalent Residential Units (ERU). Based on water demand data drawn from the Department of Ecology draft General Winery Permit, the PCI Plan application estimates that

development of Planning Area 1 would account for 239 ERU of this projected demand, from residential units, light industrial/wine production, and retail operations. Using a more conservative approach based on a "per employee" water demand for commercial employees, the City's 2021 Water System Plan update estimates 1,574 ERU total potable water demand for the project, and 327 ERUs for Planning Area 1. Regardless of which estimates are used, the City's water system currently has capacity to support the demands anticipated for Planning Area 1. Water demand in Planning Areas 2 and 3 would be primarily driven by office and industrial warehouse uses. The City is pursuing additional water supply improvements to support the demand estimated for city-wide projected growth and full buildout of the PCI Plan.

172. Some portion of certain water-related improvements are reasonably necessary to serve Planning Areas 1, 2, and 3, as follows:

Planning Area 1:

- Portion of CIP WM12 as identified in the 2021 WSP Update: Construct new 16-inch 599 Zone water main from the North Wellfield WTP, east through the site to the existing 599 Zone 12-inch water main in Reinig Road.
- CIP PZ3 as identified in the Draft 2021 WSP. Construct a new 705/599 PRV upstream of the existing WRF. (This resolves an existing high-pressure condition in the system and is therefore a City-funded project.)

Planning Areas 2 and 3:

- Complete the remaining portion of CIP WM12 as identified in the Draft 2021 WSP: Construct new 16-inch 599 Zone water main from the 599 Zone water main in SE Mill Pond Road, across the Snoqualmie River to the existing 599 Zone water main at Snoqualmie Parkway and Railroad Avenue SE. Once fire flow requirements for the development are determined, the proposed water main diameter shall be confirmed. This is shown as a Developer-funded project in the 2021 WSP Update.
- CIP F12 as identified in the Draft 2021 WSP. Construct a new 599 Zone reservoir and associated water main. Final site location to be determined. This is required for existing system needs, for the Mill site development, and other growth, so it is identified in the 2021 WSP Update as jointly funded by the City and developers.
- CIP M1 and M2 as identified in the Draft 2021 WSP. Conduct a study to increase the supply capacity of the system and implement the recommendations. This study will address potential water supply required to provide service to future customers, both within and outside of the Mill site development, and so would be jointly funded by City and developers.

173. A condition is recommended to confirm actual water supply demand for Planning Area 1 prior to issuance of building permits, and to ensure that adequate potable water capacity is available prior to approval of building permits for Planning Areas 2 and 3. See Condition #46 in Section J (Staff Recommendation). Conditions are also recommended to require the applicant to pay applicable General Facilities Charges (GFCs) for Planning Area 1, and Planning Areas 2 and 3, construct or pay a proportionate share of the improvements identified in Findings of Fact #172 above, subject to credit for any City-funded improvements. See Condition #47 and 48 in Section J (Staff Recommendation).

174. The wastewater treatment facility has residual capacity of 0.20 million gallons per day (MGD) and 766 ERU. This estimate, which is based on the adopted Wastewater System Plan, includes all growth projected to 2032, and is sufficient to accommodate the additional growth represented by buildout of the Snoqualmie Mill site. A condition is also recommended to ensure wastewater treatment capacity is available prior to approval of building permits for Planning Areas 2 and 3. See Condition #46 in Section J (Staff Recommendation).

175. The development concept for Planning Area 1 includes wine production, which carries specific water demand and wastewater discharge needs. Winery production generates wastewater with high concentrations of Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS); depending on the volume of wastewater, winery flows can adversely affect wastewater treatment facility operations unless mitigated. City of Snoqualmie regulations require notice to the City if discharges to the public sewer are likely to exceed established BOD and TSS limits. In such cases, the City may require pretreatment before discharge is allowed to the public sewer.
176. The City's wastewater treatment facility may not have sufficient 5-day Biological Oxygen Demand (BOD5) treatment capacity to serve the full buildout of Snoqualmie Mill Planning Area 1, or Planning Areas 2 and 3 under the proposed action; this conclusion is preliminary and is based on the 2021 General Sewer Plan (GSP) update. Improvements to increase the wastewater treatment facility's rated BOD5 loading capacity may be necessary to support full development of Snoqualmie Mill Planning Area 1 for wine production. The Phase 3 Water Reclamation Facility ("WRF") Improvement project, which is currently under design and planned for construction in 2023-2024, and/or possible construction of a pre-treatment facility, which is currently proposed as part of the Snoqualmie Mill sewer system design, will provide sufficient wastewater treatment capacity for development of Planning Area 1 including wine production. Pre-treatment is intended to implement the requirements and/or recommended BMPs of Ecology's Winery General Permit (issued May 2018, effective July 1, 2019). Implementation of Ecology's BMPs by all Snoqualmie Mill wineries would ensure that wastes reaching the City's wastewater treatment plant are consistent with the City's discharge standards in SMC 13.04.430 and SMC 13.04.460. Conditions are recommended to require the applicant to pay applicable General Facilities Charges (GFCs) for Planning Area 1, and Planning Areas 2 and 3, construct or pay a proportionate share of the cost of constructing wastewater treatment (including potentially on-site equalization and pretreatment) system improvements reasonably necessary for the Planning Area 1, and for Planning Areas 2 and 3. See Condition #48 in Section J (Staff Recommendation).
177. The plan to serve Snoqualmie Mill Planning Areas 2 and 3 will be reevaluated when the proposed development plans for both areas are more certain, but prior to design of the utilities for these areas. At that time, analysis would also determine if one lift station could be used to serve both Planning Areas 2 and 3, or if both lift stations could pump to the lift station that will serve Planning Area 1. The City's objective is to minimize additional maintenance from new developments where feasible, which includes limiting the number of lift stations owned and operated by the City.
178. Stormwater from the project site will be discharged to the Snoqualmie River. In general, the quality of stormwater discharged to the river is expected to improve relative to current conditions. Wetland buffer restoration and enhancement proposed as part of the PCI Plan, discussed in Draft EIS Section 3.4 – Plants and Animals, would improve the effectiveness of currently degraded wetland buffers to filter impurities from stormwater. In addition, as described in the Master Drainage Plan (Appendix A of the Draft EIS), runoff from developed areas would be treated prior to discharge to the river. Impacts on Snoqualmie River water quality would not be significant.
179. Water, stormwater, and sanitary water systems shown in the PCI Plan for the project are preliminary; detailed designs will be developed at the civil engineering plan review and/or building permit stage for Planning Area 1, and later for Planning Areas 2 and 3. Materials and pipe connection systems would be reviewed by the City at the time detailed development plans are submitted.
180. Site grading and sanitary sewer systems would be designed in such a manner that the rims (or tops) of manholes would lie above the 100-year base flood elevation of the Snoqualmie River.

181. Critical facilities (lift stations) would be located in areas recommended by the geotechnical engineer that can provide stable foundations and would lie above the 100-year base flood elevation of the Snoqualmie River, as required by the City's Flood Hazard regulations (SMC 15.12).
182. Critical gravity utilities, primarily sanitary sewer, would be placed on an engineered subgrade per the recommendation of the geotechnical engineer. Use of earthquake-resistant ductile iron pipe will be considered to reduce the risk of failure of the water distribution system for the Proposal from a seismic event. Use of high-density polyethylene (HDPE) pipe will be considered for possible mitigation of potential settlement for gravity sewer mains. Utilizing backfill that has the same density as the native soil will also be considered for possible mitigation of potential settlement of gravity sewer mains.
183. The project's water supply and distribution, wastewater treatment and conveyance, and stormwater improvement requirements and fair share mitigation responsibilities will be determined more specifically as review of the project continues. Conditions of approval are recommended to require the applicant to construct or pay a proportionate share of construction improvements that are reasonably necessary due to the project, with and for the details of those requirements to be addressed in the development agreement for the project. See Condition #48 in Section J (Staff Recommendation).
184. The Snoqualmie Mill site is included in the City's retail water service area for the 2021 Water System Plan update. As such, it includes the jobs and population associated with the 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, and the development may also require a Project Report.
185. The Snoqualmie Mill site is included as part of the City's sewer service area for the 2021 GSP update. As such, it includes the jobs and population associated with the Proposal, except for any winery production at the Snoqualmie Mill site. Ecology may require an Engineering Report addressing any proposed winery production at the Snoqualmie Mill site.

Annexation Implementation Plan

186. This PCI plan application addresses several of the requirements of the Annexation Implementation Plan adopted by the City in 2016. These include provision A6, which requires the application for the PCI Plan and preparation of the SEPA analysis; provision B4, which requires sensitive areas studies, all of which are provided with the EIS; provision B5, which addresses Sewer and Water Plan updates that are in progress as discussed in the EIS; and provision B8, which calls for coordination with King County Historic Preservation Office on adaptive re-use of the Powerhouse, also discussed in the EIS.
187. This PCI Plan also addresses several Snoqualmie Comprehensive Plan Policies from Section 8 Annexation Implementation Plans. Specifically, it provides a mixed-use plan (the PCI Plan) that will be the controlling document as called for in policy 7.8.4; it provides buffers from adjacent lands, including rural and resource areas as called for in Policy 7.8.5; and it includes studies of all sensitive areas in the EIS, as called for in Policy 7.8.6.

I. CONCLUSIONS OF LAW

1. The public notice requirements of Chapter 17.85 SMC have been met.
2. Development of the Snoqualmie Mill site is governed by the requirements of SMC 17.20.050 (Planned Commercial/Industrial) and Chapter 17.50 SMC (Planned Unit Developments).
 - a) Per SMC 17.20.050(K), the decision process for PCI Plans shall be as set forth in Chapter 17.50 SMC, Planned Unit Development Permit regulations.
 - b) Per SMC 17.50.090 and .130, the application process for PCI Plans includes a preapplication conference, submittal of an application with specific materials, Planning Commission public hearing, Planning Commission recommendation, and City Council decision, except that in the event of an administrative appeal of a final EIS for a proposed planned unit development, references to the "Planning Commission" are deemed references to the "Hearing Examiner."
 - c) Because an appeal was filed on the EIS, the hearing on the PCI Plan has been consolidated with the appeal before the Hearing Examiner, rather than being heard by the Planning Commission, as required by SMC Sections 17.20.050(K), 17.50.130, and 19.04.235(C).

Planned Commercial/Industrial Plan Criteria

3. SMC 17.20.050.A states the purpose for PCI Plans. The PCI Plan proposes development that is consistent with the purpose stated in the Code. The PCI Plan proposes development of approximately 1.83 million gross square feet of light industrial, manufacturing, warehouse, office, retail, restaurant, and residential uses divided into three distinct planning areas (see Exhibit B). These uses would be concentrated on approximately 34% of the site area, for both efficient use of the land and preservation of open areas and the rural character surrounding the development. Although the site is large, development would be maintained at a scale similar to that of the mill that once occupied the site, and around which the town of Snoqualmie developed. Approximately 63% of the site (166 acres) would remain undeveloped and be maintained for open space, landscaping, wetlands and streams, wildlife habitat, passive recreation, and flood storage. These elements are proposed to be integrated into the site development plans and include pedestrian links and trails. The Proposal includes the preservation and integration of valuable elements of the site's history in the development plans, as feasible, which will also serve to maintain Snoqualmie's small-town character. The project would be largely self-contained and visually isolated from adjacent uses by topography and vegetation, and would be compatible with adjacent uses. With regard to infrastructure, under the development agreement and the proposed in Conditions #35 to #35 in Section J (Staff Recommendation) the project would be compatible with adjacent and nearby lands because it would have natural areas between those uses throughout most of the site, and where it would have industrial and commercial uses abutting adjacent property, the property is generally in commercial or industrial use. This criterion is met.
4. SMC 17.20.050.B requires approval of a PCI Plan for development on any parcel of two acres or larger in the PCI district, and limits further subdivision. The PCI Plan application states that all development would be controlled by the approved master plan. No further subdivision of the site is proposed; however, reconfiguration of existing lot lines would occur after approval of the PCI Plan. The PCI Plan would therefore function as essentially a binding site improvement plan comprised of the existing tax parcels of the contiguous SMV ownership. A lot line adjustment will be processed in accordance with the PCI Plan to reconfigure the tax parcels to serve as the legal lots associated with future site development activity permits and/or commercial building permits. To ensure that this criterion is met, the lot line adjustment shall be applied for prior to application for building permits, and shall be recorded prior to issuance of building permits. See Condition #4 in Section (Staff Recommendation). With this condition, this criterion will be met.

5. SMC 17.20.050.C applies to parcels less than two acres. There are eight tax parcels that collectively make up the ownership of the Snoqualmie Mill PCI Plan site area. Each tax parcel is larger than the required two-acre minimum in Provision C. Therefore, the permitted uses are not regulated by the Business-General (B-G) district standards. This criterion is met.
6. SMC 17.20.050.D applies to projects that include land in the Planned Residential (PR) district. The PCI Plan site does not include land in the PR district. Therefore, this provision does not apply.
7. SMC 17.20.050.E encourages but does not require a mix of uses, both vertically and horizontally. The project includes a mix of uses, including commercial, industrial, and residential. This criterion is met.
8. SMC 17.20.050.F requires that parcels in the application be under common ownership or subject to common control. This criterion is met, because the Snoqualmie Mill Ventures, LLC owns all parcels affected by the application.
9. SMC 17.20.050.G specifies open space requirements for the project. The project would provide substantially more than the minimum required open space. See Table 1 and Findings of Fact #165. This criterion is met.
10. SMC 17.20.050.H requires that project infrastructure be designed so that it can be efficiently extended to adjacent property. Development of the site would occur in three distinct areas, over an approximate 10-to-15-year period. Proposed circulation, solid waste disposal and recycling, and water, sewer and stormwater management systems are designed accordingly. The primary road and utility system layout would be established with Planning Area 1, and can reasonably be expanded with each subsequent phase of development. This criterion is met.
11. SMC 17.20.050.I provides flexibility by allowing for deviations from standard zoning requirements when it would advance the purpose of the PCI zoning district stated in SMC 17.20.050.A and still protect health, safety, and the environment. The purpose of the PCI district is to provide for imaginative, well-designed, master-planned commercial/industrial development containing compatible and complementary uses, including mixed or single retail, wholesale, service and professional businesses, second-story residential uses above such businesses, office and light industrial uses, on parcels of 2 or more acres, which:
 1. Optimizes the efficiency of the use of land;
 2. Is at a scale which serves to maintain existing small-town character;
 3. Optimizes the opportunity for public amenities such as open space, parks, and trails;
 4. Promotes or encourages pedestrian and bicycle orientation and provides the opportunity for district-wide coordination and continuity of pedestrian and bicycle corridors; and
 5. Gives due consideration to development which can reasonably be anticipated on adjacent or nearby lands, both with respect to common infrastructure requirements and compatibility of uses.

PCI Plan Proposed Deviations

12. The proposed deviations to street design standards in SMC Ch. 12.16 for roadway layout on Mill Pond Road would provide better circulation and enhance the shoreline. See Findings of Fact #18 to #27. The roundabout at Mill Street would both improve access to the site and facilitate through traffic movement on Mill Pond Road. The elimination of sidewalk on a portion of Mill Pond Road would allow more room for buffer plantings next to the river.
13. As proposed, a standard sidewalk is shown on both sides of the proposed roundabout on Mill Pond Road, which would be at a location where the buffer between the road and the river is minimal. By ending the sidewalk on the north side of the roundabout, a greater portion of the buffer could be planted. A condition is recommended to modify the plans to show the sidewalk ending on the north side of the roundabout.
14. The proposed deviations to street design standards in SMC Ch. 12.16 for roadway layout on Mill Street include allow wider sidewalks without planting strips, and angled parking. These deviations would serve the mixed use area in Planning Area 1 better than standard roadway requirements, but proving better access and more pedestrian walking area to accommodate high use periods.
15. The proposed deviations to street design standards in SMC Ch. 12.16 for street lighting would allow the project to have a unique design for lighting fixtures without compromising the quality of lighting. See Findings of Fact #28. The PCI Plan application states as justification that *"The master planning and site development elements for the master plan site are specific to the overall project vision including aesthetics, building scale, incorporation of pedestrian-oriented retail core, outdoor seating and gathering places, passive recreation, and open space concepts."* While the lighting plan has not yet been developed, flexibility of this type is consistent with the purpose of SMC 17.20.050, provided that the lighting plan that is developed meets standards of safe roadway engineering.
16. To ensure that the deviation for street lighting would meet the criteria for allowing deviations, a condition of approval is recommended that the design guidelines include standards for a unified lighting plan for all streets in the development that has been reviewed by a qualified engineer, provides for visibility and safety, and specifies spacing, light intensity, and glare control features, to be approved by the Public Works Director, prior to approval of roadway grading and paving permits for the project. See Condition #8 in Section J (Staff Recommendation).
17. The proposed deviation to remove the requirement in SMC 17.55.020 for a conditional use permit residential uses would provide more flexibility in development. The PCI process has ensured that mitigation is provided for off-site impacts, and the proposal to provide design guidelines to ensure on-site uses are compatible would accomplish the same purposes as conditional use approval. See Findings of Fact #29 to #33. Accordingly, a condition of approval is recommended to incorporate performance standards for air quality, vibration, heat, glare, noise, and waste storage and disposal that provide equivalent protection to residential uses within the project as those in SMC 17.55.080 into the final design guidelines for the project. See Condition #6 in Section J (Staff Recommendation).
18. The proposed deviation to remove the requirement in SMC 17.55.020 for a conditional use permit restaurant uses including tasting rooms would provide facilitate mixed use development and provide flexibility for the winemakers that are the expected occupants of Planning Area 1. See Findings of Fact #34 to #37. The PCI process has ensured that mitigation is provided for off-site impacts, and the proposal to provide design guidelines to ensure on-site uses are compatible would accomplish the same purposes as conditional use approval. A condition of approval is recommended to incorporate

standards that provide equivalent protection to restaurant uses within the project as those in SMC 17.55.080 into the final design guidelines for the project. These standards may include separate provisions for tasting rooms, recognizing that a room within a wine-making facility may occasionally experience noise or other impacts from the facility in which it is located. See Condition #6 in Section J (Staff Recommendation).

19. The proposed deviation from the requirement in SMC 17.55.020 for a conditional use permit for a "utility" in the OS-2 zone would be the proposed stormwater outfall that passes under the realigned portion of Mill Pond Road. The review provided through the SEPA process and conditions that would apply to the design of the outfall would serve the same purpose as the conditional use process would provide. See Findings of Fact #38 to #43. Eliminating the need for an additional permit would serve the purposes of the PCI Plan approval process in SMC 17.20.050.A by facilitating the proposed development under the proposed PCI plan.
20. The proposed deviation from the building height limits in SMC 17.55.040 would serve the purposes of the PCI Plan approval process in SMC 17.20.050.A by better accommodating a variety of commercial, industrial, and residential uses. See Findings of Fact #45 to #48. The SEPA EIS found that there would be no significant adverse impacts to adjacent properties or key viewpoints. See Findings of Fact #129 to #131. The applicant has proposed to develop design guidelines that would further limit visual impacts, such as through perimeter plantings, materials, and roof forms.
21. To mitigate potential view impacts, a condition is recommended to include guidelines for perimeter plantings to be included in the design guidelines for the project. These should include evergreen screening of Backlot Industrial or Surface Parking within 300 feet of Mill Pond Road or facing the Planer building, Terrace Area, or other open space areas. The required screening should include a minimum 10-foot wide evergreen planting area with screen planting to a minimum of 7 feet above grade, and evergreen and deciduous trees spaced no more than 15 feet on center. See Condition #9 in Section J (Staff Recommendation).
22. Potential impacts of the increased height could be further reduced with design measures that reduce the visual contrast between the project buildings and the rural landscape setting. A condition is recommended that the design guidelines for the project specify the maximum height and roof pitch for each planning area and include specifications for allowable colors of roofs and wall areas above 40 feet. Materials other than glass above 40 feet should be muted green or earth-tone colors. No mirrored or highly reflective glass should be permitted. Recognizing that the design guidelines may be developed in phases, no development should occur in areas where design guidelines have not been completed. See Conditions #10 and #22 in Section J (Staff Recommendation).
23. The proposed deviation from requirements in SMC 19.12.170.I, would allow the minimum width of wetland buffers in Planning Area 1 to be reduced to allow for site development, including location of a constructed stormwater wetland within one of the wetland buffers. Extensive buffer enhancement is proposed, and average buffer widths would exceed the requirements of the Code. See Findings of Fact #49 to #60. The deviation would serve the purposes of the PCI Plan approval process in SMC 17.20.050.A by allowing design flexibility while ensuring that the environment would not be harmed, provided the proposed mitigation and monitoring program that would accompany building permits is properly designed and executed.
24. A condition is recommended requiring that a detailed wetland mitigation plan be provided, to include measures to protect wetlands during construction and for the life of the project. The plan should include measures calling for avoidance of wetland buffers for construction staging. The mitigation

plan should include a determination by a qualified biologist that with mitigation, the stormwater wetland adjacent to Wetland 12 would preserve or enhance wetland functions, and that stormwater discharges meet the requirements in Chapter 15.18 SMC, that stormwater discharges to the wetland's outer buffer will not negatively affect the hydroperiod of the wetland and that there will be no adverse impacts to the water quality of the wetland. The mitigation plan should include a monitoring plan to ensure that the wetlands and wetland buffers develop and are maintained per the plan, and a method of ensuring that the costs of establishing and maintaining the buffers will be covered by the applicant regardless of the success of the project. See Condition #11 in Section J (Staff Recommendation).

25. With the conditions recommended, deviations requested are consistent with SMC 17.20.050.I and SMC 17.20.050(A) because they achieve and advance the purposes of the PCI district as stated in SMC 17.20.050(A), by providing appropriate design flexibility without reducing protection for health, safety, and the environment. See Findings of Fact #18 to #60, and Conclusions of Law #12 to #25.

Planned Unit Development Criteria

26. In addition to the requirements in SMC 17.20.050.A–I, SMC 17.20.050(J) requires that Planned Commercial/Industrial applications conform to the Planned Unit Development regulations in Chapter 17.50 SMC, including the application requirements in SMC 17.50.020, the general and specific standards in SMC 17.50.050 and .060, and the requirements for a report and recommendation from the Hearing Examiner as specified in SMC 17.50.090(E). These criteria are also met, as explained below.
27. SMC 17.50.020(A) requires the site to consist of at least 2 acres. The site is approximately 261 acres. See Table 1 and Findings of Fact #9. This requirement is met.
28. SMC 17.50.020(B) requires that an application be made by all owners of the subject property. This requirement is met, as Snoqualmie Mill Ventures, LLC owns all parcels affected by the application.
29. SMC 17.50.020(C) requires that open space be permanently protected by appropriate covenants or other restrictions. Through the conditions of approval recommended below, this requirement is met.
30. SMC 17.50.020(D) requires that off-street parking be provided in conformance with the parking requirements in Chapter 17.65 SMC. The updated application indicates a provision of 1,114 parking spaces in Planning Area 1, which exceeds the requirements of 1,050 spaces. See Findings of Fact #156. The provision of parking in Planning Areas 2 and 3 is not known at this time. Through the conditions of approval recommended below, this requirement is met.
31. SMC 17.50.020(E) requires the development not conflict with the Comprehensive Plan. This criterion is also met; see Conclusions of Law #46 through #71 related to Comprehensive Plan policy conformance, below.
32. SMC 17.50.020(F) requires that development be completed within 2 years of plan approval, unless another period is stipulated or time for completion is extended by the City Council. The applicant proposes a buildout period of 10–15 years for all three phases. Through the conditions of approval recommended below, this requirement is met.
33. SMC 17.50.020(G) requires all streets to conform to the City's street standards. Per SMC 17.20.050(I), the applicant has requested a deviation from this requirement. With the requested deviations, this requirement is met. See Conclusions of Law #12 to #16.

34. SMC 17.50.020(H) requires the provision of City utility systems including water, wastewater (sewer), and stormwater built to City specifications along with appropriate easements. Through the conditions of approval recommended below, this requirement is met. See Findings of Fact #171 to #186.
35. SMC 17.50.070(A) requires that residential unit density may not exceed that of the underlying zoning district by more than 20%. The requirement is not applicable, as there is no residential density limit in the PCI district.
36. SMC 17.50.070(B) allows building height to be varied from the underlying zoning district provided the heights meet certain criteria. The applicant has requested a deviation to allow building heights for all buildings except the three Mixed-Use/Residential buildings up to a maximum of 55 feet to the ridgeline and 35 feet to the eave line; and up to a maximum height of 70 feet to the ridgeline of the roof and 55 feet to the eave line for the three Mixed-Use/Residential buildings. With the deviations for building height, the requirement is met. See Conclusions of Law #20 and #22.
37. SMC 17.50.070(C) requires the perimeter of the project to be compatible with surrounding uses. The southwestern perimeter of the project, which consists of large open areas adjacent to Mill Pond Road including some parking areas, stormwater management facilities, and critical areas and their associated buffers, is consistent with the open space uses immediately adjacent to the Snoqualmie River. The northern perimeter of the project consists of critical areas and their associated buffers, and is compatible with the adjacent additional critical areas, vacant land owned by King County, and the Snoqualmie Sand and Gravel pit. The eastern perimeter of the project is not specifically defined at this stage as the precise layout of Planning Areas 2 and 3 is not known at this time; however, the immediately adjacent uses include the future Snoqualmie Valley Trail and the forested hillside leading up to 396th Drive SE. The southern perimeter of the project consists of critical areas and their associated buffers and stormwater management facilities, and is consistent with the adjacent Borst Lake/Mill Pond. In addition, the project provides for perimeter landscaping. With the conditions of approval recommended below, this requirement is met.
38. SMC 17.50.070(D) requires landscape screening to minimize visual impacts on adjoining properties. The project would provide for perimeter landscaping through development of the design guidelines. Through the conditions of approval recommended below, this requirement will be met.
39. SMC 17.50.070(E) requires one or more egress circulation points connected to public rights-of-way. The project includes a primary entrance to the project at a new roundabout on SE Mill Pond Road, which is public road, a secondary access point to the existing Weyerhaeuser haul road and a future access to 396th Drive SE and/or SE Reinig Road (both public roads) through Planning Area 3. The requirement is met.
40. SMC 17.50.070(F) requires arrangement of open space to integrate with the project, instead of being isolated. The Proposal would integrate open space in and around the Planning Area 1 winery-related development, through protection and enhancement of existing wetlands and buffers to restore them to a functional, connected state compared to the current disconnected state; and retention of the significant wetland area on the north side of the haul road north of Planning Area 1 and creation of constructed stormwater wetlands in a large, open space buffer separating Planning Areas 1 and 3. The requirement is met.
41. SMC 17.50.070(G) specifies open space requirements. Because the project would provide substantially more than the minimum required open space (Findings of Fact #166), the requirement is met.

42. SMC 17.50.070(H) requires that streets comply with City street standards. As permitted by SMC 17.20.050(I), the applicant proposes to deviate from a limited number of these standards; see Findings of Fact #16. In summary, the applicant proposes allowing a roundabout at the main site entrance on Mill Pond Road; a pedestrian path only on the east side of Mill Pond Road south of the roundabout (instead of a sidewalk on both sides); a modified local access section for Mill Street to accommodate angle parking (rather than parallel); expanded pedestrian facilities and no planter strip; and a unique street lighting design to be required throughout the project. With the requested deviations, this requirement is met. See Conclusions of Law #12 to #16.
43. SMC 17.50.080 requires conformance with parking requirements in Chapter 17.65 SMC. The updated project application indicates a provision of 1,114 parking spaces in Planning Area 1, which exceeds the requirements of 1,050 spaces. See Findings of Fact #155. The provision of parking in Planning Areas 2 and 3 is not known at this time. Through the conditions of approval recommended below, this requirement will be met.
44. SMC 17.50.090(E) requires that the Hearing Examiner's report to the City Council address certain specified items. This requirement is met, because these Findings of Fact and Conclusions of Law address the items specified in SMC 17.50.090(E)(1) – (6), as set forth below:
1. *Suitability of the site areas for the proposed development.* The suitability of the site for the project is addressed in Findings of Fact #9.
 2. *Requirements of the subdivision code of the proposed development.* The project does not require a subdivision but, instead, contemplates a lot line adjustment to be processed in accordance with the PCI Plan to reconfigure the existing tax parcels to serve as the legal lots associated with future site development activity permits and/or commercial building permits. To ensure that this criterion is met, a recommended condition of approval requires the lot line adjustment to be applied for prior to application for building permits, and be recorded prior to issuance of building permits. Requirements of the planned unit development (PUD) code (Ch. 17.50 SMC) are addressed in Conclusions of Law #26–45.
 3. *Mitigating of adverse environmental impacts* is addressed in the Findings of Fact above. See Findings of Fact #63 to #185.
 4. *Compliance of the proposed development to the provisions of this chapter [Ch. 17.50 SMC]* is addressed in Conclusions of Law #26–45.
 5. *Time limitations, if any, for the entire development and specified stages:* There are no specific time limitations associated with this application.
 6. *Development in accordance with the Snoqualmie Vicinity Comprehensive Plan and other relevant plans* is addressed in Conclusions of Law #46–71 below.
45. SMC 17.50.120 specifies the requirements for design guidelines for a Planned Unit Development. This requirement will be met through approval of design guidelines concurrent with the first grading or building permit application. Through the conditions of approval recommended below, this requirement will be met.

Comprehensive Plan Consistency

46. SMC 17.50.090(E)(6) requires the report of the Hearing Examiner to identify how the Proposal is "in accordance with the Snoqualmie...Comprehensive Plan and other relevant plans." Conclusions of Law #46-71 document the project's consistency with the City of Snoqualmie GMA Comprehensive Plan, "Snoqualmie 2032."

47. The project is consistent with multiple components of the Comprehensive Plan's Vision statements, including the following:

[We Have a] Healthy, Diverse Economy:

· A diverse economic base that generates sufficient revenue to provide and maintain the facilities and services needed and expected by our citizens.

· Mature and highly productive business and light-industry centers integral to the success of both the local and regional economy and that provide family-wage jobs for residents of Snoqualmie and the surrounding rural area.

· Conveniently-located retail shops and services that meet the needs and interests of Snoqualmie area citizens and visitors

The project will add to the City's economic base, generate more than sufficient revenue to maintain services to the project, and provide an additional, productive business and light-industry center that contributes to the success of the City's and the regional economy. It will also provide conveniently-located retail services (wine production, wine tasting, and restaurants) that meet the needs of Snoqualmie-area residents and visitors.

48. The Mill site is designated as a Local Center for economic development (Ch. 3.F.3), as the Old Mill area for Community Character (Ch. 5.E.9), and as the Mill Site Planning Area for land use purposes (Ch. 7.E.3). Redevelopment of the Mill site as proposed in the PCI Plan and as conditioned as recommended herein is consistent with the Comprehensive Plan's overall vision for Mill site redevelopment as set forth in Chs. 3.F.3, 5.E.9 and 7.E.3.

49. *Policy 3.2.7 – Ensure sufficient water capacity and wastewater treatment capacity are available to support planned economic development within the mill site and urban growth area.* The City has sufficient water capacity and wastewater treatment capacity to support the demands anticipated for Planning Area 1. The City is pursuing additional water supply improvements to support the demand estimated for citywide projected growth, including the urban growth area, and full buildout of the Snoqualmie Mill PCI Plan. Washington law allows development approvals to be conditioned on future demonstration of adequate water supply, and recommended Condition #46 of PCI Plan approval requires demonstration of adequate wastewater and water capacity prior to additional approvals for Planning Areas 2 and 3. Through the conditions of approval recommended below, the project is consistent with Policy 3.2.7.

50. *Policy 3.3.4 – Apply zoning controls that limit uses with low employment density, lower wage jobs, and/or minimal tax revenue to the City, particularly in the Snoqualmie Hills and Mill Planning Areas, including uses such as warehouse/distribution, server farms and similar uses.* The proposed PCI Plan includes a mix of uses including warehouse/manufacturing, light industrial, retail/restaurant, residential mixed use, and office uses. The warehouse component would consist of up to 37% of the total floor area constructed. Therefore, the proposed PCI Plan limits such uses. The project is consistent with Policy 3.3.4.

51. *Policy 3.3.5 – Support and encourage new and expanded business and industry growth that provides higher employment density, jobs with salaries matching local housing costs, and employment opportunities suited to the education level and skills of our current and future population.* The

proposed PCI Plan includes a mix of uses including warehouse/manufacturing, light industrial, retail/restaurant, residential mixed use, and office uses. The light industrial and office components would consist of up to 66% of the total floor area constructed. Therefore, the proposed PCI Plan encourages such uses. The project is consistent with Policy 3.3.5.

52. *Policy 3.4.3 – Maintain the City’s distinct “main street” retail environment, requiring buildings and storefronts in the Downtown, Meadowbrook, and the Snoqualmie Ridge retail areas to be set to adjacent public street right of way, to maintain pedestrian orientation, storefront visibility and streetscape character.* While not specifically applicable to the Snoqualmie Mill property, the Proposal would focus on creating a “main street” environment along the proposed Mill Street, with a plaza at the eastern end of Mill Street. The project is consistent with Policy 3.4.3.
53. *Policy 3.4.5 – Optimize the use of ground floor spaces for retail uses by directing office, service and other non-retail uses to side streets and upper floors within retail districts.* The project would focus retail and restaurant activity on the proposed Mill Street, with non-retail uses focused on other streets behind Mill Street. The project is consistent with Policy 3.4.5.
54. *Policy 3.5.2 – Maximize the Snoqualmie River as a tourism asset by protecting downtown riverfront properties from erosion and opening the riverfront to visitors by developing a looped “riverwalk” trail with connections to the local Centennial Trail and the regional Snoqualmie Valley and Preston-Snoqualmie trails.* At buildout of Planning Areas 2 and 3, the City’s intent is to convert a portion of SE Mill Pond Road to a non-motorized trail as the current vehicle connection offered by Mill Pond Road would be shifted to roads internal to the Snoqualmie Mill project. This conversion of Mill Pond Road would help to complete the “Riverwalk” trail on the north/east bank of the Snoqualmie River and provide a connection from the Snoqualmie Valley Trail to Snoqualmie Falls. In addition, the applicant SMV has already conveyed land to King County to help close the gap in the Snoqualmie Valley Trail between SE Reinig Road and SE Tokul Road; completion of this segment of the Snoqualmie Valley Trail is dependent on King County acquiring additional land from Weyerhaeuser. To the extent the Policy is applicable, the project is consistent with Policy 3.5.2.
55. *Policy 3.5.9 – Support resource-based industries in the local economy, such as outdoor recreation oriented business, locally-grown food production and artisan food entrepreneurs.* The project intends to gear Planning Area 1 toward wineries, wine making, tasting sales, and hospitality. This orientation would support local food production and artisan food entrepreneurs, as well as provide a destination for guests at nearby lodging establishments (the Salish Lodge & Spa and Snoqualmie Inn). The project is consistent with Policy 3.5.9.
56. *Policy 3.6.1 – Balance development with environmental protection and conservation to maintain and enhance the health and beauty of the City’s natural setting.* The project provides open space substantially in excess of the requirement. See Findings of Fact #120. The EIS contains visual simulations that demonstrate that impacts on the visual character of the surrounding area and on scenic viewpoints would remain minimal, while also providing residents, employees, and customers of the project exposure to and views of the nearby Snoqualmie River and Mount Si. The project conforms to Policy 3.6.1.
57. *Policy 3.6.2 – Uphold a high standard of design and property maintenance throughout the City.* The project would be subject to design guidelines and covenants, conditions, and restrictions that would serve to maintain a high level of design while ensuring appropriate maintenance of the property post development. The project conforms to Policy 3.6.2.

58. *Policy 4.2.1 – Encourage innovative housing that helps promote City goals for affordability, high-quality sustainable design, and housing to meet diverse household sizes, types and age ranges, and consider flexibility in density and design standards to support such projects.* The project would provide an innovative housing development consistent to achieve an integrated high-quality development. The project includes up to 160 residential units located in mixed-use buildings above ground floor retail/restaurant uses. See Findings of Fact #118. The project conforms to Policy 4.2.1.
59. *Policy 4.4.1 – To reduce housing operation and maintenance costs, energy use and impact on natural resources, encourage the use of high quality, durable, and low-maintenance building materials, high-efficiency energy systems, and environmentally responsible building principles in all new housing and renovation projects.* The project applicant has indicated the design guidelines will establish a goal of LEED Gold or Platinum certification to achieve energy efficiency. While this is an aspirational goal, striving toward such certification (or similar) would significantly enhance the energy efficiency of the project. The project conforms to Policy 4.4.1.
60. *Policy 5.1.8 – Maintain exterior lighting standards that promote dark-sky maintenance throughout the City.* A recommended condition of approval would require that exterior lighting comply with standards as promulgated by the International Dark-Sky Association and that these standards be integrated into the design guidelines for the project. As conditioned, the project is consistent with Policy 5.1.8.
61. *Policy 5.2.1 – Work individually and cooperatively to identify and evaluate important aspects of historical and cultural heritage and adopt appropriate regulations or other strategies to protect these resources.* The applicant has completed a cultural resources analysis as a part of the EIS process that resulted in recommendations for conditions of approval including an unanticipated discovery plan to protect any possible cultural resources on the site. Further, recommended conditions of approval will mitigate potential impacts on cultural. The project conforms to Policy 5.2.1.
62. *Policy 6.1.5 – Locate open space areas to protect critical areas such as wetlands, landslide hazard and erosion-prone areas, and maintain such areas in their natural condition, including native vegetation preservation.* The project incorporates large open space areas around wetlands, and would restore or enhance degraded and/or non-functional critical area buffers on the project site. The project conforms to Policy 6.1.5.
63. *Policy 6.4.3 – Encourage no net loss of remaining wetlands acreage, functions and values within the City and urban growth area, and the creation of wetlands where feasible.* The project would restore or enhance degraded and/or non-functional wetland and stream buffers on the project site, achieves no net loss of existing wetland acreage, functions and values, and utilizes constructed wetlands for stormwater management. The project conforms to Policy 6.4.3.
64. *Policy 6.4.4 – Restore previously disturbed wetland and stream buffers where feasible, and maintain restored buffers to limit the reintroduction of invasive species.* The project would restore or enhance degraded and/or non-functional wetland and stream buffers on the project site. See Findings of Fact #88. The project conforms to Policy 6.4.4.
65. *Policy 6.4.5 – Ensure wetland regulation and mitigation implementation is flexible enough to allow for protection of systems or corridors of connected wetlands, encourage incentives such as property tax reductions, conservation easements and other techniques to preserve wetlands.* The project utilizes a deviation from standard wetland buffers in order to protect the system and corridors of existing wetlands while also allowing for the enhancement and restoration of existing, degraded, and/or non-functional wetland and stream buffers. See Findings of Fact #49 through #60. The project conforms to Policy 6.4.5.

66. *Policy 7.2.9 – Encourage site design and parking standards that support other Comprehensive Plan objectives, such as impervious surface reductions, increased landscaping, better transit linkages and greater pedestrian and bicycle orientation.* With the requested deviations, the project would minimize impervious surfaces, retain existing vegetation and provide landscaping, and ensure provision of non-motorized connections within and to the development. See Findings of Fact #23. The project conforms to Policy 7.2.9.
67. *Policy 7.5.6 – Support the transformation of underutilized lands such as brownfields and greyfields to viable mixed-use or commercial/industrial employment areas as appropriate.* The project would redevelop the former Snoqualmie Mill, a brownfield site, into a mixed-use commercial/industrial employment area. The project conforms to Policy 7.5.6.
68. *Policy 8.1.3 – Ensure transportation improvements or strategies accommodate development impacts concurrent with that development, and prohibit development if it causes the levels of service for transportation facilities to decline below adopted standards, as required by the GMA.* As discussed in the EIS for this project, Planning Area 1 can be developed without significant new improvements to existing transportation facilities. Development of Planning Areas 2 and 3 would require additional traffic mitigation as identified in the EIS, and such mitigation is addressed in recommended conditions of approval. As conditioned, the project conforms to Policy 8.1.3.
69. *Policy 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 level of service.* The EIS prepared for this project has identified several impacts requiring capital improvements, including for traffic, water, and wastewater. See Findings of Fact #154 and #172. Through the conditions of approval recommended below, the project conforms to Policy 9.1.3.
70. *Action Plan Item No. 33: Work with property owners to complete advance planning and environmental review for economic development within the Mill Planning area.* City staff worked with property owners to complete advance planning (Annexation Implementation Plan) and environmental review (Draft EIS and Final EIS), resulting in this Staff Report and recommendation. Action Plan Item No. 33 is met.
71. *Community Character E.9 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.*

The project would add new access points to the site, including along SE Mill Pond Road and along the Weyerhaeuser haul road. The site owner has already conveyed property to King County to help complete the Snoqualmie Valley Trail, and ultimately development of the property would allow for conversion of a portion of SE Mill Pond Road to a non-motorized trail, which would become a key component of the Snoqualmie Riverwalk. The project would clean up hazardous materials and site contamination consistent with state law (MTCA) and Ecology requirements. The project would

construct a stormwater system, including a created stormwater wetland to detain and treat stormwater runoff, ensuring that stormwater does not adversely impact the Mill Pond/Borst Lake. Public access to the Mill Pond/Borst Lake is not contemplated in the development in Planning Area 1; future public access could occur as part of the development of Planning Area 3, but such public access would be evaluated as part of later reviews. Development of the primary access point on Mill Pond Road would provide for additional visual public access to the Snoqualmie River, as the roundabout will have sidewalks on the river-facing side. Finally, the project intends to retain and use the former Powerhouse and Planer buildings for unspecified uses, provided this is economically feasible. As a designated landmark, any modification of the Powerhouse would need to maintain its integrity as a landmark.

J. STAFF RECOMMENDATION – PCI-2017-0001

The staff recommendation is to **APPROVE** the Snoqualmie Mill Project, PCI-2017-0001, subject to the following conditions:

Conditions Related to PCI Plan Approval Criteria

1. For all subsequent permit applications and approvals, the warehouses, offices, residential units, and other physical components of the planned commercial / industrial development shall substantially conform to the details of development authorized by this PCI Plan approval, as determined by the Community Development Director. Substantial conformance shall be determined as set forth in SMC 17.30.150, and shall also be subject to the following limitations:
 - a. The number of residential units shall not exceed 160;
 - b. The total square footage of non-residential development in Planning Area 1 shall not exceed 470,000 square feet, including approximately 280,000 square feet of Manufacturing/Warehouse use, 120,000 square feet of light industrial use, and 70,000 square feet of retail/restaurant use, as described in Table 1 of this report; and
 - c. The height of all structures, measured as provided in SMC 17.10.020(GG) and SMC 17.20.040, shall not exceed the limited specified in Condition #10, below.
2. In determining substantial conformance for the project, the Community Development Director shall also be guided by:
 - a. The PCI Plan application materials depicting the conceptual design dated March 18, 2022 (Exhibit B);
 - b. The criteria in SMC 17.80.050; and
 - c. The development and design guidelines required by Conditions #5, #6, #8, #9, and #10 below.
3. The determination of substantial conformance by the Community Development Director shall satisfy the requirements of Chapter 17.80 SMC, Design Review Board.
4. Lot Line Adjustment: A lot line adjustment will be processed in accordance with the PCI Plan to reconfigure the tax parcels to serve as the legal lots associated with future site development activity permits and/or commercial building permits. The lot line adjustment shall be applied for prior to application for building permits and shall be recorded prior to issuance of building permits.
5. To ensure that the project includes design features that were discussed in the project proposal and/or required as conditions of approval, the applicant shall develop a set of design guidelines to the City for approval prior to application for any building permit. Recognizing that the design

guidelines may be developed for each Planning Area in phases, no development should occur in areas where design guidelines have not been completed.

6. To ensure that the project creates a mixed-use development where all uses are compatible, the design guidelines shall incorporate performance standards for air quality, vibration, heat, glare, noise, and waste storage and disposal that provide protection for residential and other uses within the project equivalent to those in SMC 17.55.080. These standards may include separate provisions for restaurants and tasting rooms, recognizing that a room within a wine-making facility may occasionally experience noise or other impacts from the facility in which it is located
7. To increase the plantable area between the river and the proposed roundabout on Mill Pond Road, modify the plans to show the sidewalk ending on the north side of the roundabout.
8. The design guidelines shall include standards for a unified lighting plan for all streets in the development that has been reviewed by a qualified engineer, provides for visibility and safety, and specifies spacing, light intensity, and glare control features, to be approved by the Public Works Director, prior to approval of grading and paving permits for the project's street improvements.
9. To ensure the perimeter of the project is screened, include standards for perimeter planting in the design guidelines. These shall include evergreen screening of Backlot Industrial or Surface Parking from Mill Pond Road, the Planer building, Terrace Area, or other open space areas. The required screening shall include a minimum 10-foot wide evergreen planting area with screen planting to a minimum of 7 feet above grade, and evergreen and deciduous trees spaced no more than 15 feet on center.
10. The design guidelines shall specify the maximum height and minimum roof pitch applicable to each planning area. The three Mixed-Use/Residential buildings abutting Mill Street would be limited to a maximum height of 70 feet to the ridgeline of the roof and 55 feet to the eave line. All other buildings abutting Mill Street could be built to a maximum of 55 feet to the ridgeline and 35 feet to the eave line. Other buildings in Planning Area 1, and any new buildings in Planning Areas 2 and 3 could have flat or shed type roofs and would be limited to 55 feet maximum height including parapets or other rooftop appurtenances. The design guidelines shall also include specifications for allowable colors of roofs and wall areas above 40 feet. Materials other than glass above 40 feet should be muted or earth-tone colors. No mirrored or highly reflective glass should be permitted.
11. To ensure that reduced buffer widths in Planning Area 1 do not harm wetlands, concurrent with application for grading permits, submit a Wetland Mitigation and Monitoring Plan consistent with the PCI Plan and that includes measures to protect wetlands during construction and for the life of the project. The plan shall include measures to avoid using wetland buffers for construction staging. The mitigation plan shall include a determination by a qualified biologist that, as designed, the stormwater wetland adjacent to Wetland 12 would preserve or enhance wetland functions, that stormwater discharges would meet the requirements in Chapter 15.18 SMC, that stormwater discharges to the wetland's outer buffer would not negatively affect the hydroperiod of the wetland, and that there would be no adverse impacts on the water quality of the wetland. The mitigation plan shall include a monitoring plan to ensure that the wetlands and wetland buffers are developed and maintained per the plan, and a method of ensuring that the costs of establishing and maintaining the buffers will be covered by the applicant regardless of the success of the project.

SEPA-related Conditions

Mitigation Measures for Earth Resources

12. To mitigate settlement and risks from liquefaction and lateral spreading, the following geotechnical design elements shall be addressed in the future development planning and permitting process, including civil engineering plan review and issuance of building and clear and grade permits:
 - Plan new site development in a way that does not increase loads on weak subsurface materials.
 - Keep final site ground surface elevations at or below existing site grades, except for building pads, consistent with PCI Plan drawings.
 - Require deep foundations or possibly deep ground improvement approaches for new structures, including buildings, substantial retaining walls, and similar structures with significant foundation loads.
 - Support new floor slabs on deep foundations or areas of deep ground improvement.
 - Require remedial preparation of the existing fill for new paving.
 - Support new buried utilities, particularly those that are sensitive to grade changes such as gravity sewers, on a layer of new structural fill similar to that to be used below paving.

13. The following measures shall be implemented to mitigate the risks of erosion hazards:
 - Develop a TESC Plan for the project during the design phase, and submit it to the City for review and approval as part of civil engineering plan review and clear and grade permit review.
 - Schedule or phase construction activity as much as possible to reduce the amount of earthwork activity that is performed during the winter months.
 - Install TESC measures prior to any site activity or disturbance.
 - Use filter fences as a perimeter sediment interception measure, as warranted, adjacent to wetlands, stream and river corridors, open space areas, and other sensitive areas located in or adjacent to construction zones to reduce the risk of sediment transport into these features.
 - During the wetter months of the year, or when large storm events are predicted during the summer months, stabilize work areas so the site can receive the rainfall without excessive erosion or sediment transport. Establish temporary stormwater conveyance at the stabilized areas to route runoff to the approved discharge location.
 - Control surface runoff and discharge during and following development. Under no circumstances should concentrated discharges be allowed to flow over the top of steep slopes.
 - Restore soils that are to be reused on the site in such a manner as to reduce erosion from the stockpile (e.g., covering with plastic sheeting, the use of low stockpiles in flat areas, and the use of silt fences around pile perimeters).
 - Direct all temporary or permanent devices used to collect surface runoff into tightlined systems or constructed ditch systems that discharge into approved stormwater control facilities, such as detention ponds or dispersion facilities.
 - Revegetate disturbed areas as soon as possible after construction is complete. If it is outside of the growing season, cover the disturbed areas with mulch or plastic sheeting, as described in the TESC Plan.

14. To reduce potential landslide risks from development in the northeastern corner of the site and the wood/debris pile in Planning Area 3, the following measures shall be implemented, if development is proposed on areas identified in the EIS as steep slopes.
 - Place no fill, topsoil, or other debris on steep slopes. Any fill planned for slopes steeper than 5H:1V (Horizontal:Vertical) elsewhere on the property shall be benched into the slope and placed as structural fill.
 - Remove the soil storage pile at the north end of Planning Area 3.

- Grade all permanent cut slopes in the natural sediments to a maximum of 3H:1V. Cut slopes in fill soils shall be no steeper than 3H:1V unless approved by the geotechnical engineer. Where steeper gradients are required, an approved erosion protection structure or retaining structure shall be utilized. Rockeries shall not be used in association with unstable soil or non-reinforced, fill soils.
- .

15. To mitigate the risks of seismic hazards, the following measures shall be implemented:

- **Earthquake-Induced Landslide Hazards:** Once a development concept has been formulated in greater detail, the geotechnical engineer shall review the site plans for any planned development near the toe of the steep slopes to determine if slope stability modeling is recommended.
- **SE Mill Pond Road:** Complete additional subsurface exploration and stability analyses along the bank of the Snoqualmie River and the shoreline of Mill Pond during the design process. Complete bathymetric surveys at both locations to determine the geometry of the underwater portion of the river bank and lake shoreline.
- **Slope Stability:** Evaluate and implement one or more of the following mitigation measures to address seismic stability associated with the Mill Pond Road realignment:
 - Relocate the new alignment and roundabout with a setback sufficient so that a slope failure will not impact the road.
 - Install structural elements along the roadway edge such as a continuous, large diameter drilled shaft wall (secant pile wall) to constrain the roadway prism from being undermined by a slope failure.
 - Use ground improvement methods such as stone columns or deep soil mixing to strengthen weak native soils presumed to exist beneath the river bank and area adjacent area near the top of the bank.

Mitigation Measures for Air Quality and Greenhouse Gases

16. To reduce potential air quality impacts from construction activities, the following mitigation measures shall be implemented:

- Use only equipment and trucks that are maintained in optimal operational condition.
- Require all off-road equipment to have emissions reduction equipment.
- Use carpooling or other trip-reduction strategies for construction workers.
- Implement restrictions on construction truck and other vehicle idling.
- Spray exposed soil with water or other suppressant to reduce emissions of and deposition of particulate matter (PM).
- Pave or use gravel on staging areas and roads that would be exposed for long periods.
- Cover all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck bed) to reduce PM emissions and deposition during transport.
- Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles in order to decrease deposition of particulate matter on area roadways.
- Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris.
- Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction.

17. To reduce GHG and climate change impacts, in addition to compliance with requirements of Building and Energy Codes, buildings shall incorporate green building technologies, to be described in the updated design guidelines. As provided by the PCI Plan, all buildings shall be designed to achieve

LEED Gold certification or better, to the greatest extent feasible. Documentation of LEED application shall be required with building permit applications.

Mitigation Measures for Water Resources

18. Construction work within existing functional wetland or stream buffer boundaries shall be limited to the dry season (avoiding November through February) where feasible.
19. Develop stormwater facilities consistent with the PCI Plan drawings and, to the extent feasible, implement the following mitigation measures to reduce potential impacts on water resources:
 - Maintain consistency of existing drainage patterns following development.
 - Maintain flows to surface water-dependent wetlands and streams to provide recharge to the shallow aquifer.
 - Create additional recharge opportunities through the use of constructed stormwater wetlands as part of the runoff treatment system for the site.
 - To ensure coordinated planning and operation of stormwater facilities, develop and provide an Operations and Maintenance (O&M) Manual to the City at the completion of each phase of development and at the completion of overall site development; the O&M Plan will summarize the operation and maintenance requirements of the stormwater system.

Mitigation Measures for Plants and Animals

20. The following mitigation measures shall be implemented to reduce potential impacts on plants and animals:
 - Concurrent with to development in Planning Areas 2 and 3, update the analysis of impacts on wildlife based on more detailed plans, and identify measures to minimize impacts and implement benefits to wildlife habitat.
 - Implement compensatory mitigation measures for impacts on wildlife habitat, including the enhancement of existing wetland buffer vegetation within Planning Areas 2 and 3 by removing invasive species and the replanting of these areas with native trees, shrubs, and groundcovers.
 - Landscaped developed open space areas with a variety of native plant species of value to wildlife, where feasible, given considerations of maintaining adequate sight distance for public safety and other applicable landscape standards.

Mitigation Measures for Environmental Health

21. The following mitigation measures shall be implemented to reduce potential impacts on environmental health:
 - Prior to issuance of grading or construction permits in Planning Areas 2 and 3, establish procedures to remediate legacy site contamination, consistent with MTCA and in coordination with Ecology.
 - To mitigate the risk of a potential release associated with the storage and use of hazardous materials for the cleaning and sanitation of wine-making equipment, all wine-making processes shall occur within an enclosed building.
 - To acknowledge that the project would elevate portions of the Snoqualmie Mill property above the base flood elevation (and therefore reduce the risk of the storage and use of hazardous substances within the floodplain), pursue a Letter of Map Amendment (LOMA) with FEMA to remove the relevant portions of the Snoqualmie Mill property from floodplain maps.

- Require all future tenants whose operations involve the use or storage of hazardous chemicals to prepare a Spill Prevention and Response Plan for their respective facilities, and to implement BMPs to ensure the proper use, handling, storage, and disposal of chemicals.

Mitigation Measures for Aesthetics, Light, and Glare

22. Update and submit design guidelines prior to applying for building permits for Planning Area 1. Because detailed plans for Planning Areas 2 and 3 will be developed later, it is recognized that the design guidelines for those areas may need to be amended. The guidelines shall be amended prior to applying for building permits in Planning Areas 2 and 3, to provide an equivalent level of detail as is provided for Planning Area 1.
23. Develop and integrate lighting standards into the design guidelines for the project that are based on IES Guidelines for general exterior lighting (RP-43) and street lighting (RP-8), establishing maximum illuminance values an appropriate color temperature range, and specifying International Dark-Sky Association-certified lighting fixtures.

Mitigation Measures for Cultural Resources

24. The applicant shall engage in additional communication with the Snoqualmie Indian Tribe regarding the Snoqualmie Falls TCP.
25. The applicant shall consult with the Washington State Department of Archaeology and Historic Preservation (DAHP) to determine the need for additional survey work regarding the Japanese community site in Planning Area 1. Alternatively, based on detailed design plans for the parking area, an engineer could determine whether soil conditions and building design would impact below ground resources.
26. Prepare an Archaeological Unanticipated Discovery Plan (UDP), approved by the City of Snoqualmie and DAHP, in case archaeological resources and/or human remains are exposed during ground-disturbing activities and construction. All ground disturbance associated with the development of the PCI Plan will be subject to the UDP.
27. The applicant shall continue to work with the Japanese Cultural and Community Center of Washington (JCCCW) regarding commemoration of the historical contribution of Japanese workers to the Snoqualmie Falls Lumber Company (SFLCo) and the local community.
28. If, in the future, a different project is planned to occur near site SF-CR#2 in Planning Area 1 (domestic debris associated with Japanese residents of the SFLCo's company town) and subsurface disturbance will extend 6 feet below the current grade, DAHP must be consulted regarding potential effects.
29. A professional archaeologist shall review the final grading plan to confirm that the depth of excavation in the vicinity of SF-CR#2 is consistent with the preliminary plan evaluated in the EIS.
30. In Planning Area 2, prior to any action that would cause an adverse effect to Crane Shed No. 3, Planing Mill-Crane Shed, or the Package Lumber Shed, the applicant should complete Historic American Buildings Survey (HABS) documentation Level III and submit the same to the City.

31. During removal of subsurface portions of the Planer Building, Dry Kilns, Finished Lumber Shed, and Package Lumber Shed, a qualified architect or architectural historian meeting the standards of the Secretary of Interior's Professional Qualifications shall be present to evaluate the significance of any structure exposed.
32. In Planning Areas 2 and 3, prior to any action that would cause an adverse effect to the potential SFLCo historic district from demolition of eligible or contributing buildings or structures, the applicant should complete Level II documentation as defined by DAHP.
33. Conduct archaeological surveys within Planning Areas 2 and 3, consisting of trench excavations and shovel probes, in the future when those planning areas are proposed for development.
34. The applicant shall engage in additional consultation with DAHP regarding the boundaries of the potential historic district in Planning Area 3.

Mitigation Measures for Traffic and Transportation

35. Prepare a Construction Management Plan prior to beginning construction. Haul route agreements and truck routes shall be established in coordination with the City of Snoqualmie, WSDOT and, if/where applicable, King County. A traffic monitoring plan shall be developed to manage traffic levels at the site access locations and determine if traffic levels during construction are higher than evaluated for the project buildout. If so, the City may require additional measures to reduce construction traffic impacts as conditions of clear and grade and/or building permit approval.
36. Develop project-specific design guidelines requiring that building owners provide facilities (e.g., bike storage, showers) to encourage bicycle use.
37. Employers that are not subject to the Commute Trip Reduction Act shall implement programs that encourage transit use.
38. The applicant, along with other developments such as Snoqualmie Hill West, shall contribute a pro rata share toward improvements at the side-street approaches at the intersection of Fisher Avenue SE, to achieve acceptable LOS.
39. At the time of development application for Planning Areas 2 and/or 3, update the transportation analysis to confirm current conditions and adopted City improvement plans, and to re-evaluate the need, design, and timing of project-specific mitigation requirements.
40. At the time of development application for Planning Areas 2 and/or 3, develop additional analysis for traffic from specific uses proposed, and work with the City to determine the appropriate proportionate share of the cost of the following identified improvements:
 - Replacement and expansion of the existing SR 202 bridge crossing the Snoqualmie River
 - Widening of the intersection of the haul road with Mill Pond Road and construction of a new roundabout.
 - Widening of the single-lane roundabout intersection at Tokul Road SE / SR 202 / SE Mill Pond Road to allow two circulating lanes.
 - Widening of SR 202 at the Snoqualmie Parkway intersection to provide one additional through lane in each direction.
 - Installation of a roundabout at the SE 99th Street/Snoqualmie Parkway intersection to achieve acceptable LOS.

- Providing an eastbound to westbound U-turn on Snoqualmie Parkway or at the Allman Avenue SE / Snoqualmie Parkway intersection (to the east of the unsignalized intersection of Orchard Avenue SE / Snoqualmie Parkway).
- Providing a westbound to eastbound U-turn on Snoqualmie Parkway or at the Orchard Avenue SE / Snoqualmie Parkway intersection (to the west of the unsignalized intersection of Allman Avenue SE / Snoqualmie Parkway).
- Adding turn lanes or an urban mini-roundabout at the intersection of Meadowbrook Way SE / Park St to achieve acceptable LOS.
- Adding a full signal at the Fisher Avenue SE / Snoqualmie Parkway intersection (to replace the existing HAWK signal).
- Adding a roundabout at the Meadowbrook Way SE / SE North Bend Way intersection.


Mitigation Measures for Utilities

41. The project development standards/design guidelines shall require the usage of water-conservation features to reduce water demand and ensure that development does not exceed system capacity.
42. Concurrent with submittal of civil engineering plans for Planning Area 1, submit a detailed wine production wastewater flow and loading analysis for review and approval by the City. The flow and loading analysis must document the anticipated number and sizes of wineries, estimated volume and BOD5 strength of winery wastewater generated, peak or maximum day and month discharges, pipe sizing, proposed equalization sizing, and other relevant information.
43. As directed by the City through any conditions of approval of the winery flow and loading analysis, design and build as part of Planning Area 1 wastewater conveyance improvements on-site equalization facility sufficient to attenuate peak winery-related wastewater flow and loading, and dedicate equalization facility to City.
44. Prior to issuance of building permits for winery-related uses, demonstrate that the project would implement the BMPs identified in Ecology's Winery General Permit, which include removal of solids, control of organic loads, maintenance of the waste management system, and improving water efficiency or, alternatively, pay a proportionate share of improvements to the Snoqualmie Water Reclamation Facility (SWRF) and operations and maintenance costs related to same, as necessary to treat winery wastewater in a manner equivalent to the Winery General Permit BMPs.
45. Prior to issuance of building permits, develop an Operation and Maintenance Manual that summarizes the stormwater system operation and maintenance requirements to ensure coordinated planning and operation of stormwater facilities. Provide the manual to the City at the completion of each phase of development and at the completion of the overall site.
46. Prior to issuance of building permits for Planning Area 1, re-confirm actual estimated water and wastewater demand for Planning Area 1, and obtain certificates of water and sewer availability. Confirm that the Phase 3 Water Reclamation Facility Improvement project is substantially complete prior to issuance of certificates of occupancy for wine production facilities.
47. Prior to issuance of building permits for Planning Areas 2 and 3, ensure that available water supply and wastewater treatment capacity are adequate to serve the new proposed development.

48. Pay an applicable sewer, stormwater and water connection charges as set forth in the Snoqualmie Municipal Code, including service installation charges, direct facilities charges, general facility charges ("GFCs") and latecomers fees, calculated in accordance with the then-applicable sewer, stormwater and water connection charges and paid at the times set forth in Chs. 13.04, 13.10 and 13.12 of the Snoqualmie Municipal Code, as it now exists or may subsequently be amended.
49. Construct the water system facilities specifically needed to provide water service or fire flow to the project and not included in the calculation of the water connection charges required by Condition #48 and Ch. 13.12 SMC, as identified in Findings of Fact #176 above. Alternatively, where improvements are needed by or will make service available to the City or other existing or future City utility customers, applicant shall pay the proportionate share of the cost of construct of such improvements. The proportionate share amount, timing of payment, and credits (if any) for developer construction of City facilities, to be set forth in the Development Agreement.

Mitigation Measure for Public Services.

50. Pay the proportionate share of the cost of a fire ladder truck sufficient to provide fire response to buildings higher than the PCI district height limit, with the proportionate share amount and timing of payment as determined in the Development Agreement.



Jason Rogers
Interim Community Development Director

March 22, 2022

Date

Attachments:

- Exhibit A –Application Submittal Requirements
- Exhibit B – PCI Plan Application (including Site Plans)
- Exhibit C – Notice of Application and Public Hearing
- Exhibit D – List of Property Owners within a 500-foot Radius of Project Boundaries
- Exhibit E – Scoping Summary