Exhibit 3, Post-Staff report pre-hearing public comment

Note: Admissibility of public comments into the record for this project is subject to further rulings by the Hearing Examiner based on motions by parties. This list is not considered final but is provided for public information.

a) Harold Erland PowerPoint presentation submitted prior to hearing
b) Eric Robinson March 28, 2022
c) Wayne Russel March 29, 2022, w/ 3 attachments
    1. Staff Summary of Former Weyerhaeuser Mill site reported environmental activity and remediation, September 22, 2011
    2. Assessment of PCB contamination for Snoqualmie Falls Plywood Plant Fire Site
    3. Site Characterization, former Cashmere Mill Site, March 20, 2013
d) James Scott Urquhart March 30, 2022
e) Thyra Demetrick March 29, 2022
f) Connie So letter 3-26-2022
g) Hollan Read 3-30-2022
h) Carson Maestas 3-30-2022
i) Nathan Kryger 3-30-2022
j) Jeff Groshell 3-30-2022
k) Snoqualmie Community Action Network comment cover letter, 3-30-2022
    1. SCAN marked up amendments to staff report conditions
    2. SCAN comments on mill site staff report other than conditions
    3. SCAN comments on updated application
    4. Memorandum to City Councilmembers with Eight Proposed Amendments Attached
    5. SCAN email 3-30-2022
l) Auryel van Gemert 3-30-2022
m) Alena & Brian Yuhl 3-30-2022
n) Anna Boranian 3-30-2022
o) Wayne A Russell 3-30-2022 with attachments
    1. [duplicate] Staff Summary of Former Weyerhaeuser Mill site reported environmental activity and remediation, September 22, 2011
    2. Duplicate
    3. Duplicate
    4. Wayne's GPS Elevation
    5. photo
p) Julie Lake 3-30-2022
q) Cristie Coffing 3-30-2022
r) Kenya Dillon 3-30-2022
s) Peggy Shepard 3-30-2022
t) JCCCW 3-30 2022
u) Greg Balmer March 30 2022
v) Sharilyn Lux 3-30-2022
w) Kathryn Graham 3-30-2022
x) Morgan Siedel 3-30-2022
y) Amanda Rich 3-30-2022

z) Dawn and Mark Harper 3-30-2022
aa) Kenneth McNeill and Samantha Ghosn 3-30-2022
bb) Kris Natarajan 3-30-2022
cc) Monica Lowney 3-30-2022
dd) Auryel van Gemert 3-30-2022
ee) Julie Lake second 3-30-2022 comment
ff) Mary Norton 3-30-2022

Jason Rogers

From: Harold Erland <hmerland@comcast.net>
Sent: Monday, March 28, 2022 5:05 PM
To: Gwyn Berry
Cc: Harold Erland; dickscheel@outlook.com
Subject: Mill Site Mitigations

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

Attachment available until Apr 27, 2022

Click to Download

Mill Property Mitigation.pptx
21.9 MB

Attached are my comments on the Mill Site development proposals.

Thanks, Harold M Erland, Biologist

Mill Property Mitigation

by
Harold Erland
12510 461st Ave SE
North Bend, WA 9804
425-698-3180
hmerland@comcast.net

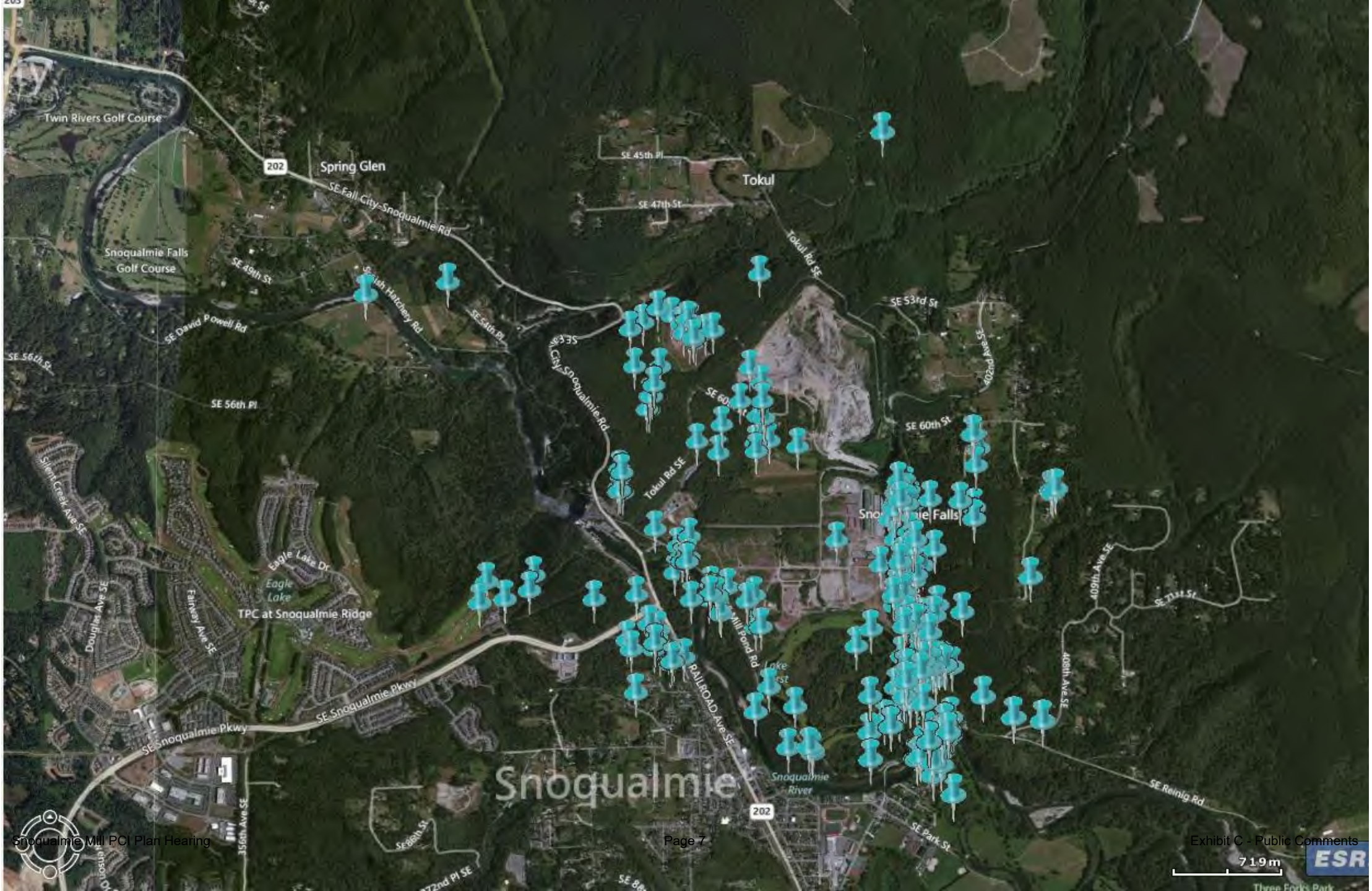
Below are problems that I do not feel have not been adaqately resolved.

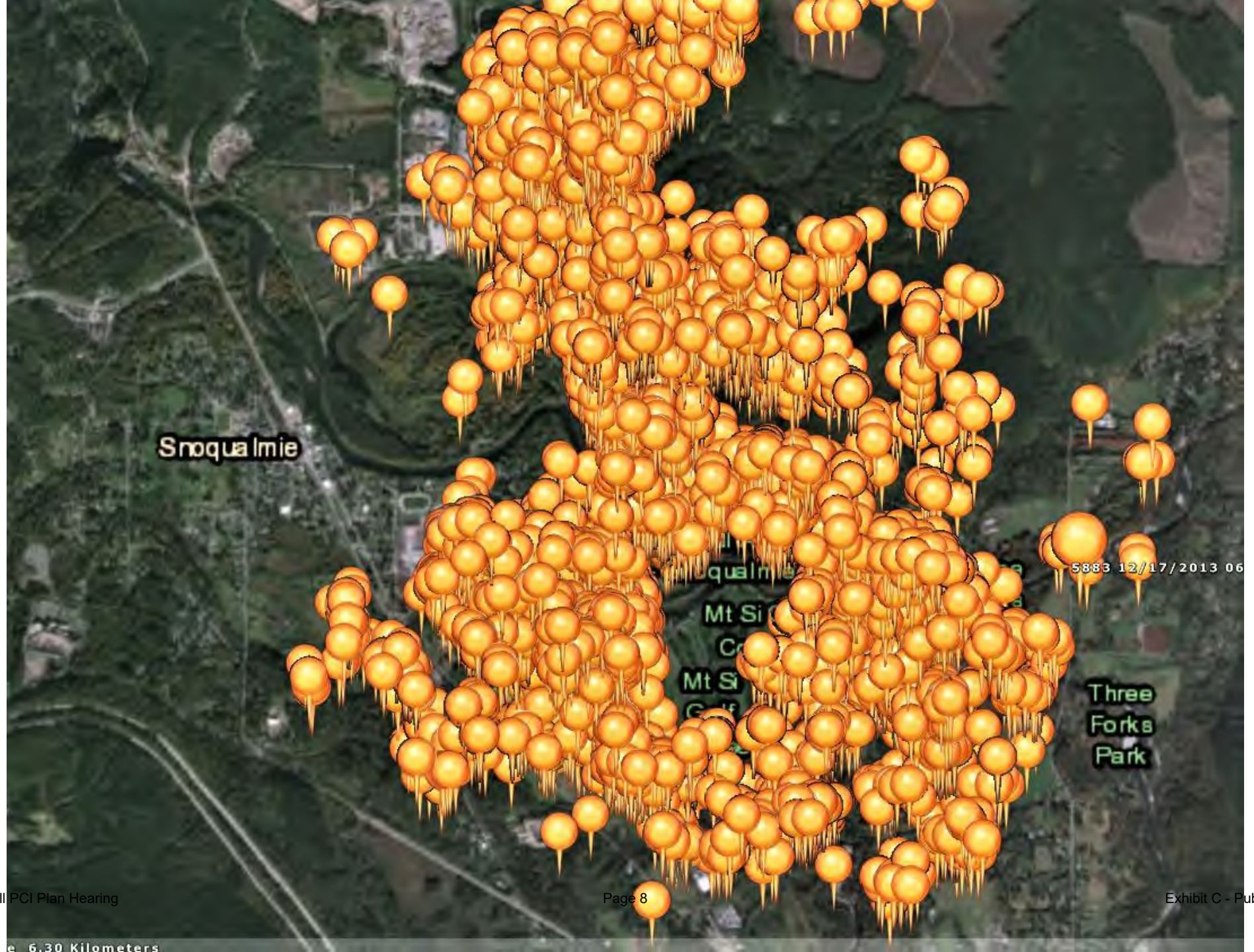
Elk Home Ranges and other wildlife

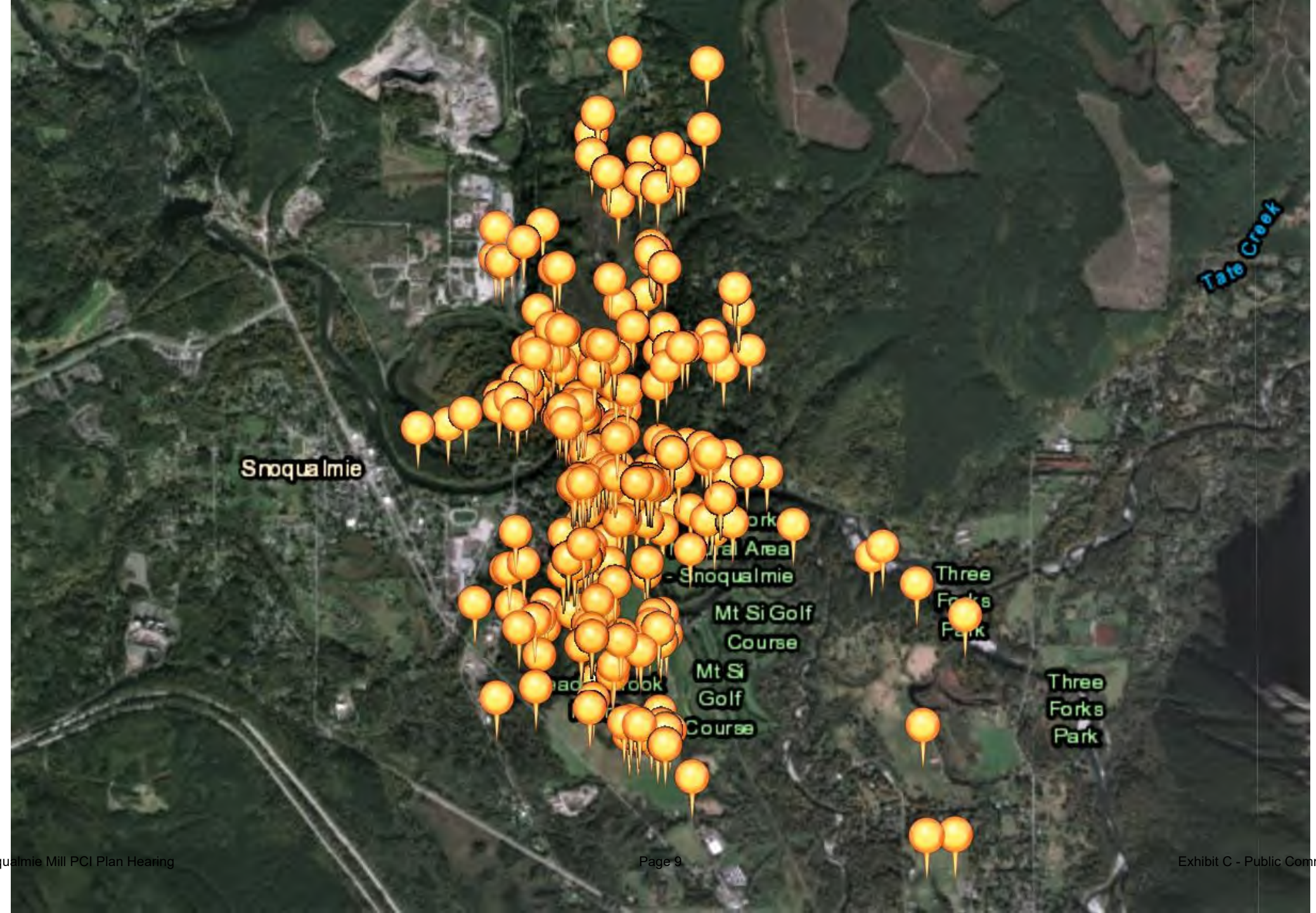
- The following pictures are the home ranges of 8 different groups of Elk that use the Mill Property. Groups, normally, consist of 10 to 15 elk.
- How are you going to replace property and forage for these elk as developing this land will push the elk onto your neighbor's property?
- Elk are an indicator species, what affects elk, effect other species
- Other species in the area include but are not limited to: Bear, cougar, bobcat, skunk, mink, beaver, muskrat, weasel, racoon, Douglas squirrel, coyote and recently an endangered wolverine was captured on film not far from this location.

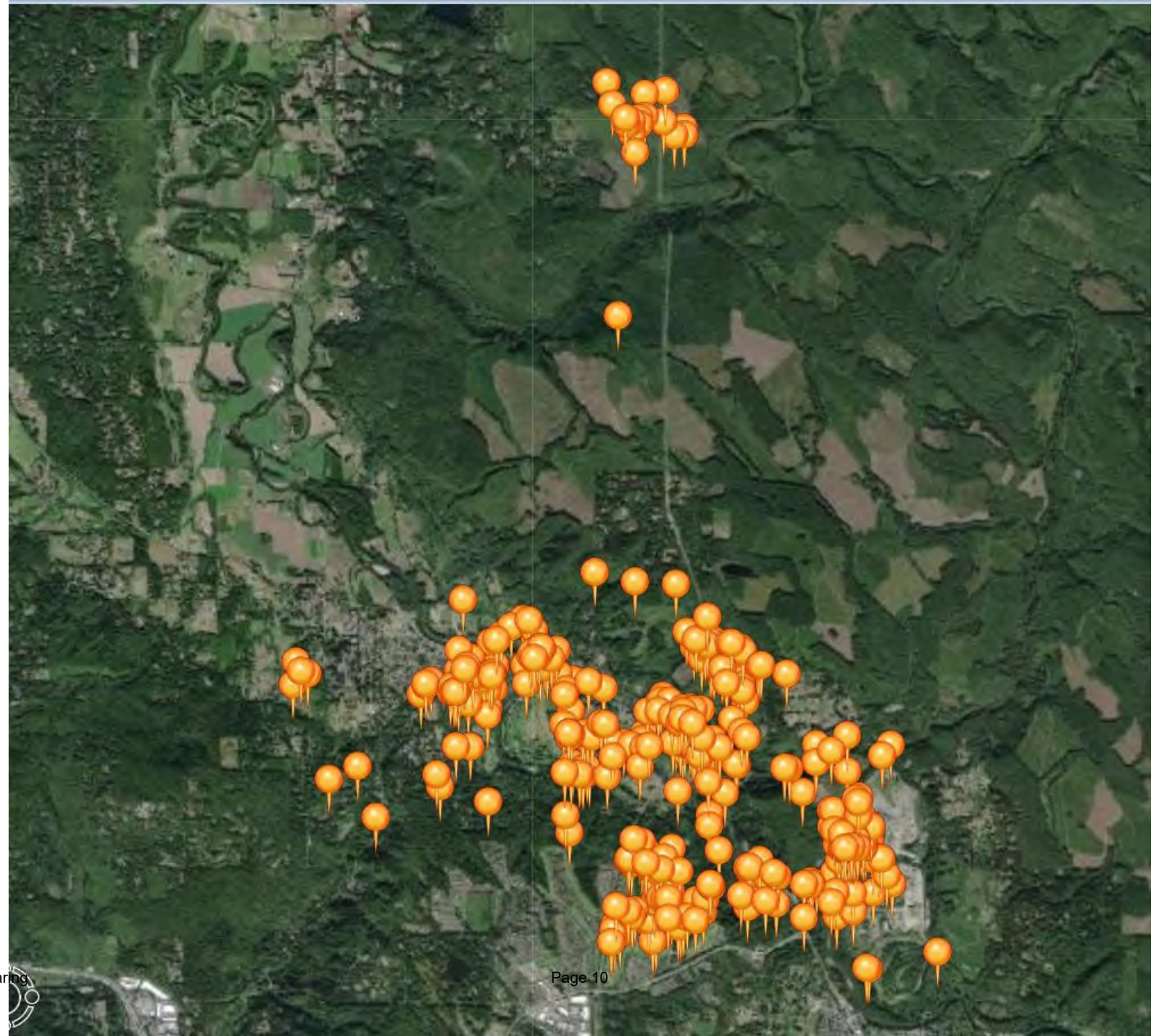
Mitigation Problems Below

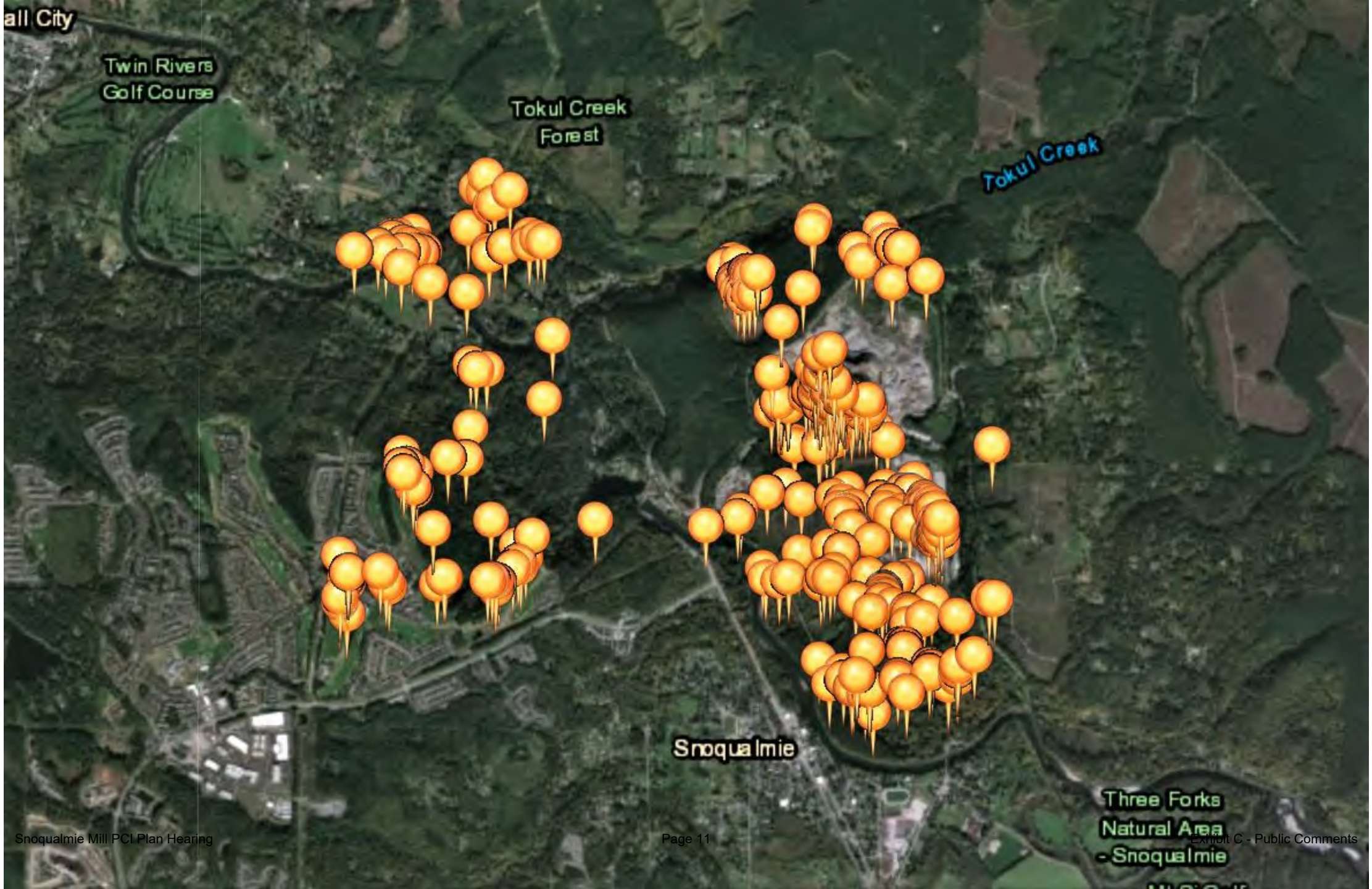
- Wild Animals and their habitat
- Birds and their habitat
- Flooding
- Pollution
- Snoqualmie Valley Trail

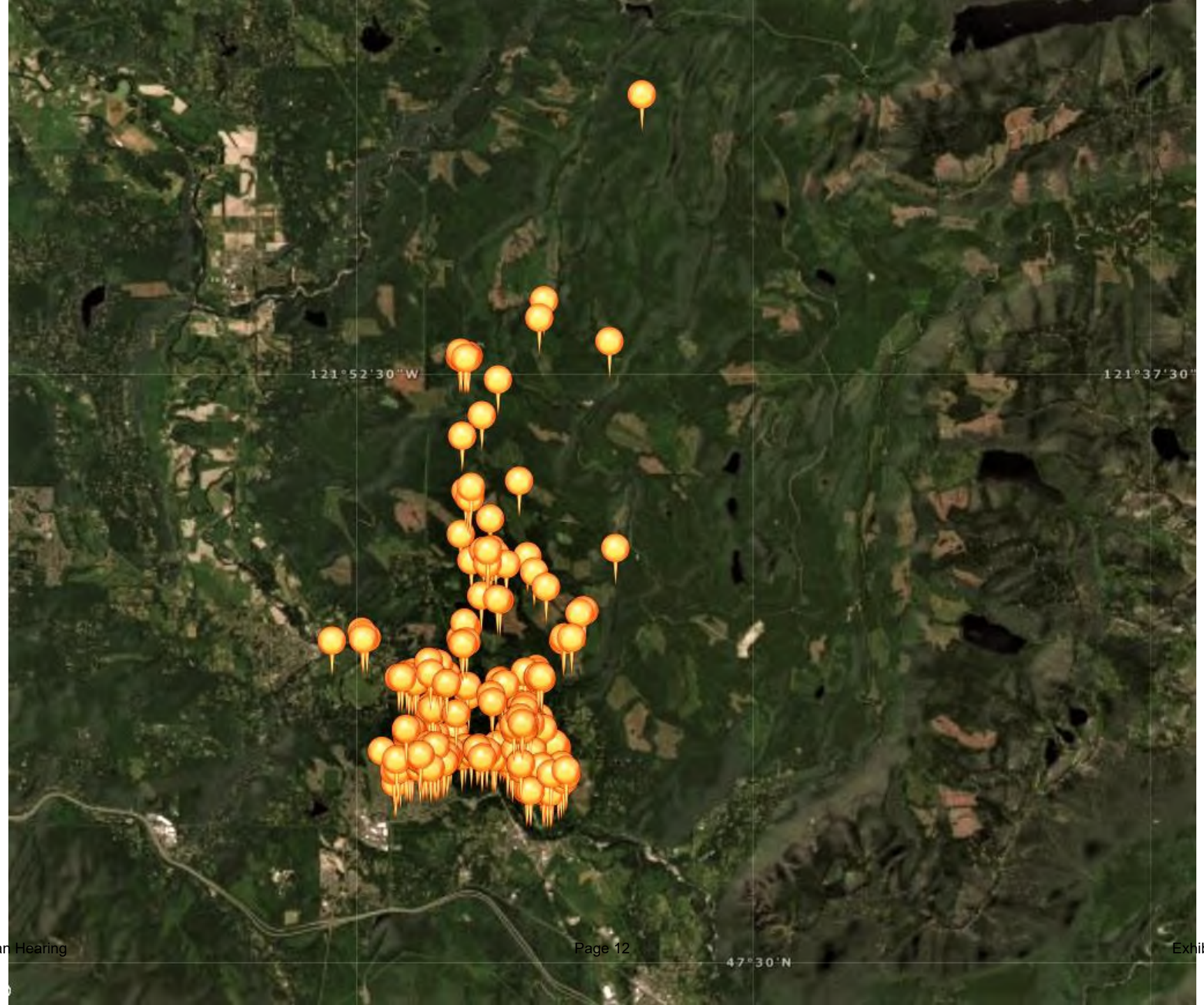

Twin Rivers Golf Course
202
Spring Glen
SE Fall City-Snoqualmie Rd
SE 45th Pl
Tokul
SE 47th St
Tokul Rd SE
Snoqualmie Falls
Golf Course
SE 49th St
Issaquah Hatchery Rd
SE 53rd St
SE David Powell Rd
SE 54th Pl
SE 56th St
SE 56th Pl
Fall City-Snoqualmie Rd
SE 60th St
Tokul Rd SE
Silent Creek Ave SE
Eagle Lake Dr
Eagle Lake
TPC at Snoqualmie Ridge
Douglas Ave SE
Fairway Ave SE
SE Snoqualmie Pkwy
Mill Pond Rd
RAILROAD Ave SE
Snoqualmie
Snoqualmie River
202
SE Reinig Rd
SE Park St
356th Ave SE
719 m
Three Forks Park

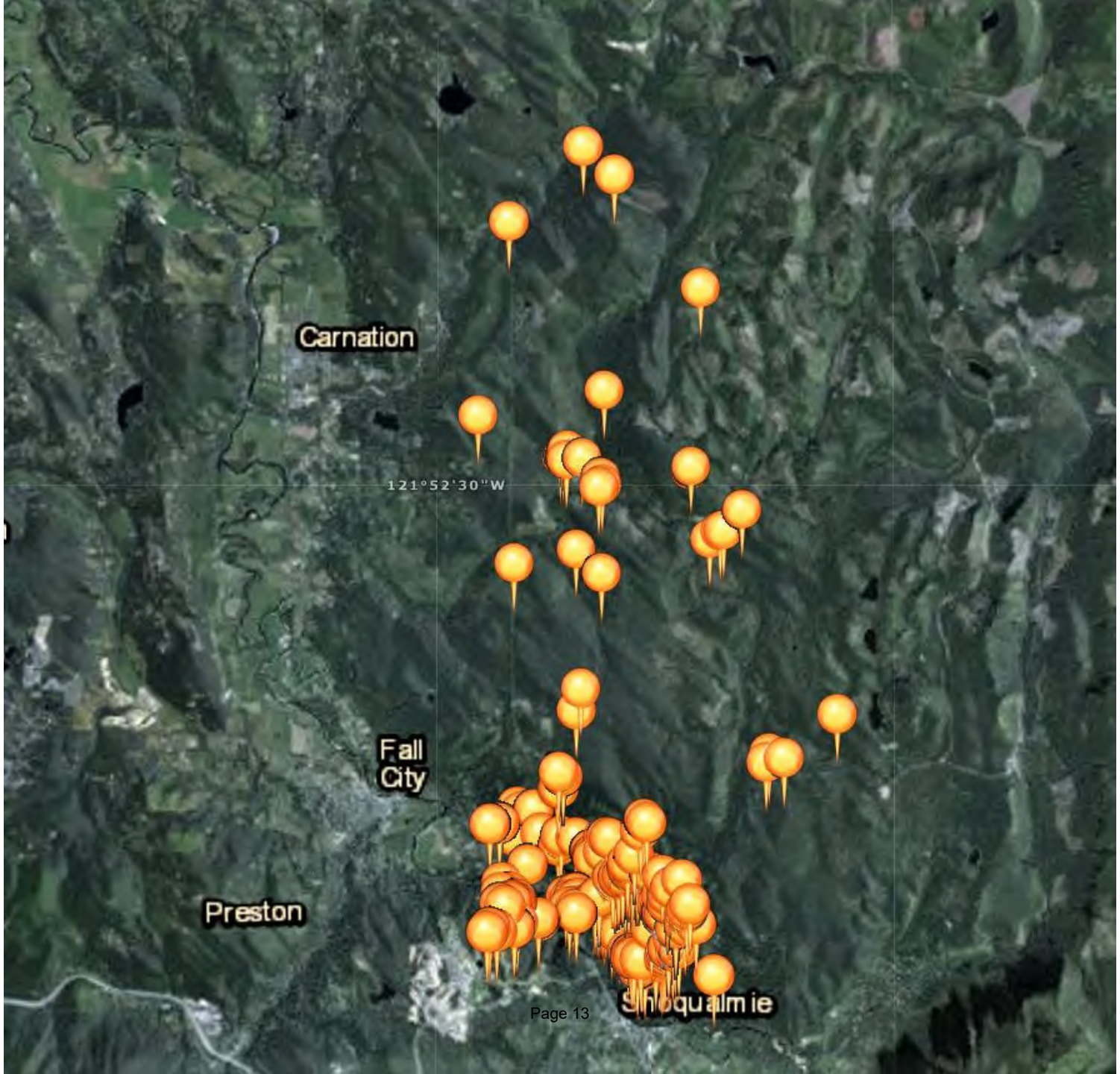

Snoqualmie
Mt Si
Mt Si
Three
Forks
Park
5883 12/17/2013 06
6.30 Kilometers

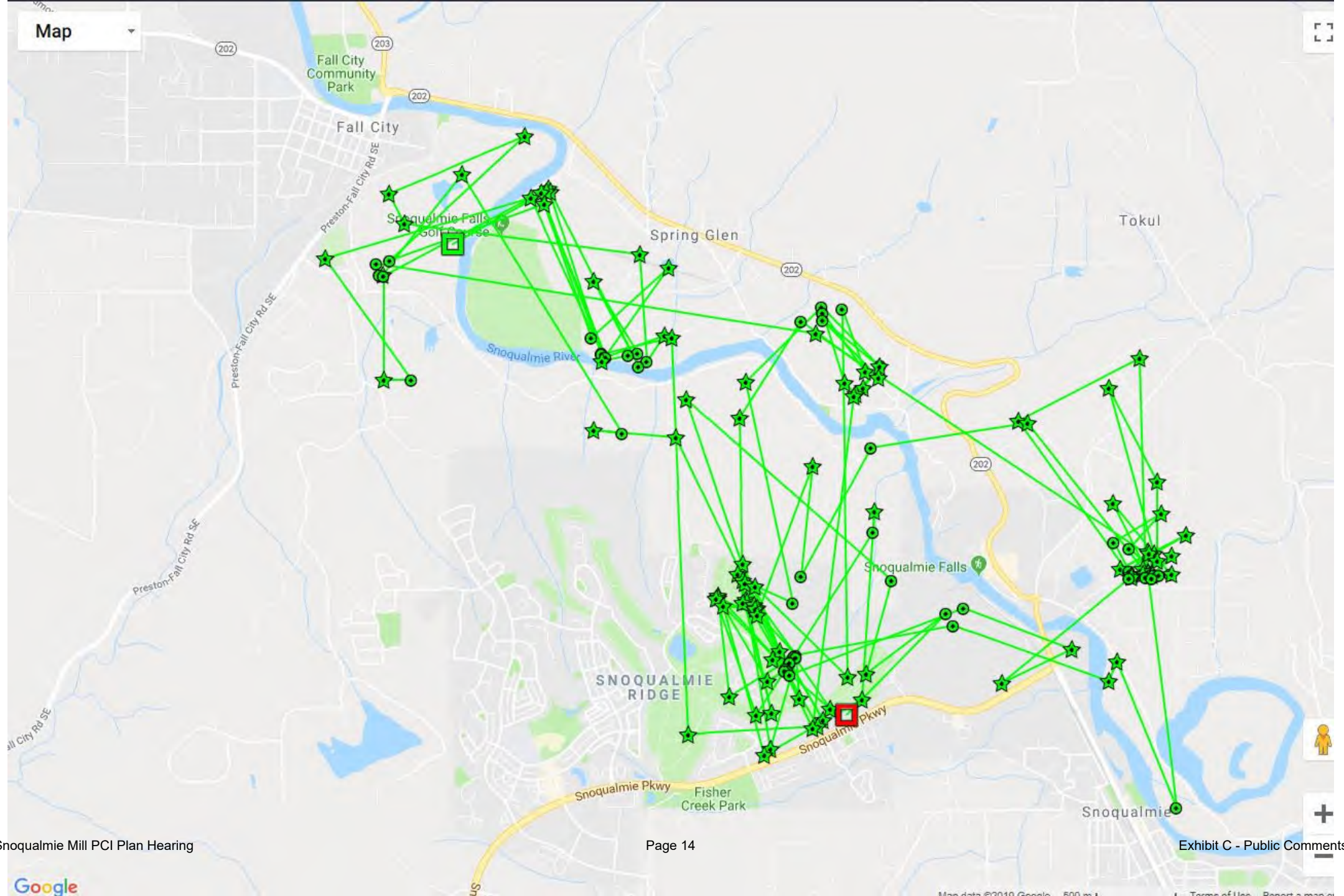

Snoqualmie
Tate Creek
Mt Si Golf Course
Mt Si Golf Course
Three Forks Park
Three Forks Park




all City
Twin Rivers
Golf Course
Tokul Creek
Forest
Tokul Creek
Snoqualmie
Three Forks
Natural Area
- Snoqualmie


121°52'30"W
121°37'30"
47°30'N


Carnation
121°52'30"W
Fall City
Preston


Map
Fall City Community Park
Fall City
Preston-Fall City Rd SE
Spring Glen
Tokul
Snoqualmie River
Snoqualmie Falls
SNOQUALMIE RIDGE
Snoqualmie Pkwy
Fisher Creek Park
Snoqualmie
202
203
Google

Birds of the Area

- The following slide, lists birds from our personal ebird lists provided to the Cornell Lab of Ornithology and due to the number and variety of species, is an ebird hotspot.
- Also, on the following slides are pictures of some of the birds that are the most beautiful in our area.
- The numbers on the previous slide indicate the number of that species seen on one occasion.

Birds of the Area

30 Mallard
3 Rufous Hummingbird
1 Great Blue Heron
3 Red-breasted Sapsucker
1 Northern Flicker
1 American Crow
5 Tree Swallow
30 American Robin
2 Cedar Waxwing
1 American Goldfinch
2 Yellow-breasted Chat
2 Bullock's Oriole
5 Red-winged Blackbird
1 Yellow Warbler
1 Lazuli Bunting
14 Wood Duck
1 Willow Flycatcher
4 Cedar Waxwings
1 Savannah Sparrow
1 Western Tanager
1 Cooper’s Hawk
1 Red-tailed Hawk
1 Swainson’s Thrush
1 Turkey Vulture
1 Black-headed Grosbeak
1 Brown-headed Cowbird
1 Western Wood-Pewee
2 Lincoln’s Sparrow
2 Spotted Towhee
25 Northern Rough-winged Swallow
3 Gadwall
1 Pacific Wren
1 Steller’s Jay
8 double-crested cormorant
60 Ring-billed duck
4 Hooded merganser
30 Green-winged teal
14 Bufflehead
1 Ruby-crowned kinglet
1 Golden-crowned kinglet
2 Common Goldeneye
1 Dark-eyed Junco
3 Common merganser
1 Bald Eagle

Bullock’s Oriole, Yellow Warbler, Common Yellowthroat

Yellow-breasted Chat, Black-headed Grosbeak, Red-breasted Sapsucker

Wood Duck, Hooded Merganser, Bufflehead

Western Tanager, Cooper’s Hawk, Bald Eagle

Flooding

- This property is surrounded on three sides by wetlands and the development will cause the distruction of valuable native habitat and wetlands for wildlife. Most of this property is in the flood way as referenced by the fact that bundled stacks of lumber at the shipping sheds, washed the adjoining farming property in the 1990 flood.
- Since the area is surrounded by wetlands, how will you mitigate the misquito problem for customers at the shopping area? Spraying pesticides?
- What will you do to prevent flooding? Raise the land out of the wetland? Destroy wetlands?

Pollution

- Mill Pond is full of contaminates from the Plywood Plant.
- The area of the Shipping Sheds, has leftover spillage from the treatment of lumber being dipped into preservative tanks?
- How are you not putting customers of the proposed development at risk?
- Due to the amount of wetlands in the area, spring and summer bring hoards of mosquitos. Only means lof controlling them is via pesticides which will affect all wildlife in the area, including mammals, fish, birds, reptiles and amphibians. This is simply not compatible with the environment.

Snoqualmie Valley Trail

- The section of the old Milwaukee RR grade from the the trestle across the Snoqualmie River on the SE Reinig to the King Couhty Parks Property on the Northwest side of the mill is the last remaining part of the trail from the Idaho border to Everett and a corridor or trial must be provided by the developer to make this connection. I see nothing in the plans that would ensure this takes place.

Assurances

- All Pollutants are removed from the site, including the mill pond.
- Any current Avian or wildlife habitat that is damaged is replaced, nearby, to mitigate the proposed loss of such habitat.
- This property would be more suitable as a park or natural area and is unique to the Snoqualmie Valley.
- The Snoqualmie Valley Trail needs to be completed through this property as part of this project.
- The use of pesticides need to be curbed as there is fish containing water on three sides of this development

Jason Rogers

From: Eric Robinson <ebrrobinson@gmail.com>
Sent: Monday, March 28, 2022 7:05 PM
To: Gwyn Berry
Cc: Peter Bullard
Subject: Input on Snoqualmie Mill Site Development

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

Ms. Berry,

I have been reviewing and discussing the Snoqualmie Mill Site development project with my friends and neighbors here in town. I am strongly supportive of responsible development within our community. Yet, there are some serious concerns I have regarding this particular project. My thoughts and comments are summarized below. Please don't hesitate to contact me directly if you would like to discuss further or if I can help in this process in any way.

Input statement:

I have read about the old Weyerhauser (Weyco) sawmill location, the planned development there, and the current and future environmental issues and concerns. Underground soil and **groundwater contamination almost certainly exists** at that site. In my 35+ years of industrial environmental experience, this type of contamination is very hard to remediate. Whether the site is developed or not, **the pollution needs to be dealt with**. These persistent chemicals are not biologically degradable (PCB's, commensurate dioxins and furans, and pentachlorophenol) and aren't going to attenuate or go away. They will just slowly migrate into the soil and groundwater sub-structures and **eventually make it to the river** - with or without development.
It appears the city may have done a Phase 1 environmental study to determine if there is a probability of dangerous contamination. The answer to that key question is certainly "yes". I do not know via the publicly available documents if the city has done a well-executed Phase 2 study. Such a study would include select soil and water boring samples to determine the existence of various toxic substances. It seems relatively obvious (although not certain) that such a study would likely find those toxic substances migrating from the site. Finally, a **Phase 3 study would most probably be recommended** that would include a full array of sampling so that the field of contamination can be mapped and various containment and remediation strategies can be developed.
It will probably cost hundreds of thousands of dollars just to study this problem. Weyco, as the original owner and operator on the site, would typically have the clear assignment of long-term environmental liability to the current owners (it's hard to get out of your obligations environmentally, even if you sell the land).
The city has a great deal more due diligence to perform, and it needs to be done whether or not the site is developed. There are lots of reasons to **"pump the brakes"** on any development of this site (environmental, water availability, traffic, etc.). **Prudent, thoughtful, and competent people and scientists need to step forward.**

My input here is about the environmental considerations given my training and background. As a general citizen, I also have concerns about traffic, water management and other items. However, my input now is targeted at the underground contamination that must be dealt with effectively if any development were to occur. Further analysis of the other issues would need to follow.
Eric Robinson, BS Chemical Engineering, long-time industrial site manager, and Snoqualmie Ridge Resident

Jason Rogers

From: WAYNE RUSSELL <waynestuff@comcast.net>
Sent: Tuesday, March 29, 2022 3:09 PM
To: Gwyn Berry
Subject: PCIP/EIS Public Hearing Comments 03/30/2022
Attachments: Environmental-Activity-and-Remediation_Staff-Summary_09222011.pdf; R10-1335783.pdf 1989 fire.pdf; Cashmere Mill Site cleanup.pdf

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

Having lived on Meadowbrook Way SE since 1984 we have grave concern about the proposed Weyerhaeuser Mill Site project by Mill Site Ventures development Proposed Commercial/Industrial Plan (PCIP) submitted to the City of Snoqualmie and already requesting deviations from city code per the supplied city staff report.

We have experienced flooding, higher traffic volumes with the first and second remodels of the Mt Si High School along with the rebuilding of the Meadowbrook bridge from two lane to one lane making it a signal one lane-controlled bridge.

When the mill was fully functional, we had three shifts per day using Meadowbrook Way along with high school/elementary school with tourist and golf course traffic. With the new Mt Si High School, we now have traffic jams at present on one of the two accesses to the Mill Site twice a day. The other access of Tokul road round-about on Hwy 202 has weekend traffic jams and traffic direction by law enforcement when large volumes of visitors are expected to Snoqualmie Falls. There is inadequate access to the site for this large-scale development.

The mill experienced a major fire of the plywood plant in 1989 which caused the release of PCBs from transformers and other pollutants into the soil and drainage to Borst lake (Mill Pond) and per attached documents may have caused these pollutants to enter the pond? Also, these same documents specify that ground water contamination may also occur.

Adding to this is the problem that after logs floated out of the log holding area during the 1984,1985 and 1990 floods a berm was placed from the Mill Pond to the haul road that entered the Mill Site to prevent re-occurrence. Berm was installed without proper permitting and allowed unseen fill behind the berms to the elevation in Planning area one which is also the Dirt Fish Rally School and present-day fill is to the top of the berm. According to the pre-annexation agreement all fill was supposed to be removed.

We personally know the elevations were added since we cut firewood and equipment would haul the wood to the edge of the sort yard since Weyerhaeuser allowed fire wood cutting on a small drive paralleling the Mill Pond Road approximately 100 yards or so long. You could see the equipment and workers moving the wood in the sort yard and delivering wood to the fire wood cutting area.

The significantly added fill affects the flooding of the City and surrounding areas along with raising the elevations to the Base Flood Elevation (BFE) of 423’ on the proposed Planning area one to make the area salable as a FEMA floodplain vice Floodway designation for building purposes per the Flood Insurance Rate Maps (FIRM). Developing and building are significantly different under these circumstances.

The irony of this is the City of Snoqualmie had a Letter of Map Revision (LOMR) done in 2010 for the remodel of Historic downtown but also included the Mill Site side of the river when it was not part of the city at the city's expense. It also appears from King County records that Mill site Ventures purchased the property in 2010. We asked Mark Hoffman about this when we were at a meeting with him and he stated “If we do one side of the river why not the other?” The concern was why we had paid for it when it didn’t belong to us and was the proposed development in planning, since owners wanted to open a Rally Race Track that was not allowed under county code.

Trucks were noticed by the jersey barriers along the Mill Pond Road in 2020 and noticed barriers were moved which is access to the Planning Area 1, so Mark Hoffman was informed because of the previous work done without permits for parking for the Boeing Classic Golf tournaments by the owners and only reported by citizens to the city for action. At a city council meeting Mr. Hoffman was asked about what was going on. We were told a Puget sound Energy vehicle had a sensor go off that indicated a gas leak but no main was in that location. Mr. Hoffman said a private contractor was called in and was going to furnish us with the information of the contractor, since it appeared it was swamp gas but we were never notified.

The staff report indicates “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.” Where is the swamp gas emanating from if the log debris has 6’ to 20’ of fill has been added over the log storage area in Planning area 1 as suggested by the Final Environmental Impact Statement (FEIS). Was this determined without a study and if one was done where are the results?

The project also calls for the realignment of Mill Pond Road which places it and the suggested roundabout at the BFE of 423’ to accommodate a wildlife passage and flood out flow to the Snoqualmie River. This will be done with major excavating and fill to accomplish this objective. Also, the excavating and grading of footings will disturb this possibly contaminated soil. Attaching information on a study done at the Cashmere Mill Site which shows what could be underlying concerns.

Some of the wetlands and drainage systems go to Borst lake which drains to the Snoqualmie River. The lake level was normally maintained by a Weir (dam) constructed by Weyerhaeuser which at some point was filled in with rock by someone? This has caused a breech in the berm east of the weir that now maintains the lake level and in summer dry months the lake is significantly lowered to where water only migrates through ground at the breech since it is below the grade to make it to the culvert under the Mill Pond Road.

Thank you for your time and consideration of these issues,

Wayne A Russell
8438 Meadowbrook Way SE
Snoqualmie, WA 98065
email: waynestuff@comcast.net

Phone: 425-888-4789

PLANNING DEPARTMENT

38624 SE River Street
PO Box 987
Snoqualmie, WA 98065

425-888-5337

www.ci.snoqualmie.wa.us
info@ci.snoqualmie.wa.us

STAFF SUMMARY OF FORMER WEYERHAEUSER MILL SITE

REPORTED ENVIRONMENTAL ACTIVITY & REMEDIATION

SEPTEMBER 22, 2011

City of Snoqualmie staff reviewed several files provided by the EPA and property owner regarding the environmental impacts and remediation activities on the old Weyerhaeuser Snoqualmie Mill Site. Multiple locations on the site could have soil, surface water and groundwater impacts due to the presence of different fuels, chemicals and other fluids stored or used onsite. However, six areas stand out for reported potential impacts and remediation activity: (1) the Former Under- and Above-ground Storage Tanks (UST/ASTs); (2) the Former Plywood Plant; (3) the "Morbark" Area; (4) the Powerhouse & Sawmill; (5) the Lumber Strapping Area; and (6) the PCP Dip Tanks. This document summarizes the remediation guidance, contaminants and known status of the site.

The Washington state Department of Ecology (Ecology) regulates and guides needed site Cleanup Levels (CLs) via MTCA, the Washington State Model Toxics Control Act of 1989.[1] The presence of contaminants does not by itself indicate the need for remediation; it is only when contaminant concentrations reach certain thresholds that they trigger a need for monitoring or removal, usually when they may be of an environmental or human health concern. MTCA provides three methods to determine if cleanup is necessary, the default Method A with specific maximum concentration limits (MCL) per contaminant, and Method B/C, which sets alternate contaminant levels (ACLs) based on the associated risks of actual/future site activity.[2] MTCA is essentially the state counterpart to CERCLA,[3] the federal Superfund law that also provides cleanup guidance. The old Weyerhaeuser Mill Site underwent a Preliminary Assessment (PA) in the Superfund data system CERCLIS in 1991, however it resulted in a "No Further Remedial Action Planned" (NFRAP) designation.[4] As such, cleanup activities would likely move from the EPA to the Department of Ecology (Ecology). The site did not proceed to a Site Inspection, and did not enter the National Priorities List (NPL); NPL sites are what are typically referred to as "Superfunds" in the EPA.[5] Overall, the site is essentially a brownfield, or an "Abandoned, idled or under-used real property where expansion or redevelopment is complicated by the presence **or potential presence** of environmental contamination" (emphasis added).[6]

When contamination is suspected or determined, a landowner may undertake voluntary remediation. Most cleanups within Washington State are Voluntary, without issuance of enforcement orders (for cleanup) from Ecology. This allows site owners more flexibility and often reduces cost, but does not provide binding agency assurance of a cleanup's adequacy.[7] Ecology has various opinion letters it can issue for voluntary clean-ups; one commonly known as a "no further action" letter is often seen as the equivalent that a voluntary cleanup has met with Ecology approval, and that no further work is necessary. It appears that a "no further action" letter was *not* pursued/obtained for this site, reportedly due to associated legal costs.[8] Under Ecology, sites undergo an initial investigation (II), receive a Site Hazard Assessment (SHA) and hazard ranking score under WARM (Washington Ranking Method), which ultimately determines whether a site will be listed on the State Hazardous Sites List (HSL). Ecology records show the Weyerhaeuser site has been awaiting a SHA for an indeterminate period.

---

[1] In some reports, TSCA or the federal Toxic Substances Control Act of 1976 also guided some cleanup levels.
[2] Delta Environmental Consultants, Inc., "Level II ESA Report," 2004, p.12.
[3] The Comprehensive Environmental Response, Compensation and Liability Act
[4] EPA Region 10 staff correspondence, 05/19/2011 letter
[5] Phone conversation US EPA Region 10 staff representative.
[6] U.S. Department of Housing and Urban Development, "Brownfield Definition", content last updated 7/30/ 09. http://www.hud.gov/offices/cpd/economicdevelopment/programs/bedi/bfieldsdefinition.cfm. Cited 07/18/11.
[7] Howard F. Jensen, HCMP Law Offices, "Frequently Asked Questions About the Washington State Model Toxics Control Act." http://www.hcmp.com/index.php?p=1_114-Frequently-Asked-Questions-About-the-Model-Toxics-Control-Act. Cited 7/15/2011.
[8] Phone conversation with Weyerhaeuser staff reported that a No Further Action Letter was not pursued due to projected costs.

The identified Contaminants Of Concern (COC) at each location of the old Weyerhaeuser Mill site vary depending on the associated activities. Those listed most include **BTEX** or the gasoline components Benzene, Toluene, Ethylbenzene and Xylene; **TPH/T(E)PH & DRO** or Total (Extractable) Petroleum Hydrocarbons and Diesel Range Organics; **PCP** or Pentachlorophenol; **T/TCBs** or tetra/tri-chlorinated benzenes; and **PCBs**, or polychlorinated biphenyls. Although not as emphasized in the reports, there is some evidence of heavy metals, including arsenic and lead and, to a lesser extent, copper, zinc and cadmium. Asbestos was also mentioned, but appeared addressed under a site-wide remediation program.[9] Location-specific summaries are as follows:

(1) Former Under- and Above-ground Storage Tanks (UST/ASTs) areas were noted for contamination from BTEX (groundwater) and TEPH & DRO (soil; groundwater). Between 1989 and 2005, about 8,387 cubic yards (CY) were processed and, at final testing, soils tested below Method B levels.[10] The process was designed to remove groundwater impacts as well, though the reviewed reports do not indicate that a recommended[11] new S/SW downgradient monitoring well was installed to obtain final groundwater results.[12] The Level II ESA also noted that there were impacted soils under nearby roadways; it is unknown if final soil removal addressed these areas.[13]

(2) The Former Plywood Plant was the site of a 1989 fire, where falling debris damaged the secondary bushings of two transformers (T-17 & T-12) and led to TPH, TCB & PCB contamination.[14] A former Press Pit area remediation achieved TPH soil cleanup targets though no groundwater analysis was conducted, and debris was buried.[15] The PCBs at T-17 were remediated to federal TSCA guidelines by June 6, 1989, and investigations closed,[16] though soils may have been remediated at the T-17 location only to federal levels at the time (50 ppm), which may not meet state standards.[17] Official closure of the other transformer (T-12) site was not possible due to elevated PCB levels in the underlying clay layer.[18] Site treatment included removing 60 CY of soil; excavation was halted so as to not breach the clay lens, whose presence prevented a PCB groundwater release. The site was capped with a geotextile in 1991[19] and, following 1995 reports that PCBs had not migrated into groundwater at the T-12 area,[20] Weyerhaeuser notified EPA Region 10 that No Further Action (NFA) would be taken, though no known response was received from EPA.[21] It is uncertain if the geotextile cap is large enough.[22] It was advised to still pursue a NFA letter from the EPA for this area, and that analysis of PCB pyrolysis isomers may be appropriate, along with deed restrictions, legal area delineation and setting a MTCA B/C ACL.[23] Today the area remains fenced and is posted as a PCB spill area.[24]

(3) The "Morbark" Area had machinery that leaked lube oil, leading to TPH & DRO soil and groundwater impacts.[25] From 1998 to 2004 approximately 2,600 CY of soil was excavated.[26] Tests in 1998 met MTCA A groundwater levels for TPH; MTCA B DRO levels were met in 2004[27] and MTCA B TPH levels were met in 2006.[28] No apparent issues remain at this location.

(4) The Powerhouse & Sawmill area contained the sawmill sash gang and log haul, the powerhouse T-7 transformer, a 50,000 gallon AST and a hog fuel ash area. For most locations, TPH & DRO were the main Contaminants of Concern (COC) in soil/groundwater. Between the log haul and sash gang areas, approximately 1,000 CY of soil were removed; final results showed soils below the MTCA B TPH CLs[29] and that groundwater samples under the sash gang were below MTCA Method A CLs.[30] It is unknown if groundwater under the log haul area is free of DRO as the groundwater sample yield was too low for analysis.[31] The T-7 transformer was tested and found to be PCB free,[32] and the AST area likewise tested free of contamination.[33] In 2003, a Boiler Ash Fill Area was identified west of the former sawmill building,[34] with several soil samples testing above benzo(a)pyrene MTCA A levels and Arsenic detected at 180 mg/kg, above the MTCA A cleanup level of 20 mg/kg.[35] In a later ESA, the ash volume was estimated at 6,000 CY;[36] it was

[9] Shannon & Wilson Inc., "Level I EA (Environmental Assessment)," 1993, p. 10.
[10] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.2.
[11] Advised in the letter to Ms. Bariska of Weyerhaeuser accompanying the 2005 Supplemental ESA for the UST/AST Area, by Delta Environmental Consultants. July 19, 2005, p. 3.
[12] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.8,9 (sections 4.4; 4.7.1; 5.0).
[13] Delta Environmental Consultants, "Level II Environmental Site Assessment (ESA)," 2004, p. vi, 5.
[14] Ecology & Environment, Inc., "Preliminary Assessment Report, Weyerhaeuser Co. Snoqualmie, WA," 1991, p. 5.
[15] Shannon & Wilson Inc., "Level I EA," p. 4, 5. A CL of 200 ppm was set, below the MTCA A CL of 2000 ppm, as of 2005.
[16] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[17] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[18] Shannon & Wilson Inc., "Level I EA," 1993, p. 2, 3.
[19] Shannon & Wilson Inc., "Level I EA," 1993, p. 3.
[20] Dalton, Olmstead & Fuglevand, Inc. Environmental Consultants, "Additional Assessment of PCB Contamination T-12 Area, Weyerhaeuser Snoqualmie Mill Site," 1994, p.2, 3 & Executive Summary.
[21] Delta Environmental Consultants, "Level II ESA," 2004, p.13.
[22] Dalton et al., "Additional Assessment of PCB Contamination T-12 Area…" 1994, 3.
[23] Delta Environmental Consultants, "Level II ESA," 2004, p.13, 14.
[24] Delta Environmental Consultants, "Level II ESA," 2004, p. 5.
[25] Delta Environmental Consultants, "Level II ESA," 2004, p. 4.
[26] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p.5. & Pacific et al"Permit Closure Report: King County," 2006, p.6.
[27] Delta Environmental Consultants, "Level III Environmental Site Assessment (ESA)," Dec. 2004, p. 21.
[28] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6.
[29] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.5.
[30] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, vi, 12.
[31] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 13
[32] Delta Environmental Consultants, "Level III ESA," Dec. 2004, vi, vii
[33] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, 14
[34] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 7
[35] Delta Environmental Consultants, "Level II ESA," 2004, p. 9

recommended it be handled according to Ecology regulations.[37] In addition, a 1993 report stated that semi-volatile compounds were detected in the Sawmill/Powerhouse area; it is unknown if these last two items were addressed based on reviewed reports.[38]

(5) The Lumber Strapping Area had a hydraulic oil spill at this location, leading to DRO and heavy oil hydrocarbons testing above MTCA A CLs in soil and TPH in groundwater.[39] In 2006, 751 CY of soil were excavated and most subsequent soil samples tested below MTCA B CLs, though one location still exceeded the MTCA B CL. [40] Earlier tests also showed TPH-D and TPH-O (-Diesel & Oil) groundwater impacts;[41] it is unknown if these issues have been addressed.

(6) There were 2 PCP Dip Tank areas identified as potentially contaminated with PCP. While the PCP Dip Tank area 2 tested free of phenolic compounds,[42] Dip Tank area 1 contained PCP groundwater concentrations that exceeded the MTCA Method B CL; results indicate that groundwater impacts were localized near the former dip tank and have not migrated downgradient.[43] It is unknown whether PCP contamination in this area has been addressed.

In addition to the above, the following areas may need further redress: groundwater DRO/TPH at the former vehicle wash pad;[44] T-18 DRO/TPH surficial soil impacts;[45] investigation of roadway surface oils, mill ditch system sedimentation,[46] and sampling of log pond sediments.[47]

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[36] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. v
[37] Delta Environmental Consultants, "Level II ESA," 2004, p. 13
[38] Shannon & Wilson Inc., "Level I EA," 1993, p. 14, 15
[39] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. iv, vi, 17, Table 11. Reports on groundwater contamination appear to conflict within ESA III, but tabular data results confirm TPH results exceeding MTCA A CLs
[40] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6, 8.
[41] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area ... July 19, 2005, p. 3&4
[42] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. v, 19
[43] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area ... July 19, 2005, p. 3.
[44] Delta Environmental Consultants, "Level II ESA," 2004, p.11 & Delta et al., "Level III ESA," Dec. 2004 p. iv-vii, 8, Table 13.
[45] Delta Environmental Consultants, "Level II ESA," 2004, p. iv, 7, 17
[46] Shannon & Wilson Inc., "Level I EA," 1993, p. 12, 13
[47] Shannon & Wilson Inc., "Level I EA," 1993, p. 12 & Dept. of Ecology, "Snoqualmie Facility Class II Inspection, 2/9/93," 1994, 22.

Assessment of PCB Contamination

Snoqualmie Falls Plywood Plant Fire Site

for

Weyerhaeuser Cascade Division

H D R

Attachment No. 4

USEPA SF
1335783

ASSESSMENT OF PCB CONTAMINATION

WEYERHAEUSER'S CASCADE DIVISION
SNOQUALMIE FALLS
PLYWOOD PLANT FIRE SITE

for

THE WEYERHAEUSER COMPANY

by

HDR ENGINEERING, INC.
BUILDING C - SUITE 200
11225 S.E. SIXTH STREET
BELLEVUE, WASHINGTON

MARCH 1989

CONTENTS

		Page
LIST OF FIGURES		
LIST OF TABLES		
1.0	INTRODUCTION	1
1.1	PURPOSE	1
1.2	SITE DESCRIPTION	2
1.3	CLEANUP ACTIONS TO DATE	2
1.4	REGULATORY OVERVIEW	5
2.0	SAMPLING PROGRAM SUMMARY	7
2.1	PLANNED FIELD ACTIVITIES	7
2.2	ACTUAL FIELD ACTIVITIES	8
2.3	GENERAL SITE ACTIVITIES	8
2.4	SAMPLING ACTIVITIES CONDUCTED BY WEYERHAEUSER	9
3.0	SITE INVESTIGATION RESULTS	10
3.1	SOLID SURFACES	10
3.2	SOILS	12
3.3	ASH	17
3.4	GROUNDWATER	17
3.5	QUALITY ASSURANCE REVIEW OF PCB ANALYSES	19
4.0	EXTENT OF CONTAMINATION	21
4.1	SOLID SURFACES	21
4.2	SOILS AND GROUNDWATER	22
5.0	CONCLUSIONS/RECOMMENDATIONS	24
5.1	CONCLUSIONS	24
5.2	RECOMMENDATIONS	24
6.0	REFERENCES	27
APPENDICES		

LIST OF FIGURES

		Page
1.1	Location Map - Snoqualmie, Washington	3
1.2	Site Map	4
3.1	Transformer Pad T-12: PCB Concentrations at Sampling Stations (ppm)	13
3.2	Transformer Pad T-17: PCB Concentrations at Sampling Stations (ppm)	14
3.3	Transformer Pad T-12: Estimated PCB Concentration Gradients (summed over all sampling depths) (ppm)	15
3.4	Transformer Pad T-17: Estimated PCB Concentration Gradients (summed over all sampling depths) (ppm)	16

LIST OF TABLES

		Page
3.1	Summary of PCB analytical results for soil and wipe testing: Transformer Pads T-12, T-16 and T-17.	11
3.2	PCB Concentrations in Ash Samples	18

1.0 INTRODUCTION

This project was conducted for the Weyerhaeuser Company to help expedite containment and removal of fire debris and contaminants at the Cascade Division's Snoqualmie Falls Mill. During the late evening hours of February 5th, 1989, a fire erupted at the plywood manufacturing facility located in the southeast portion of the mill grounds. The large, 160,000 square ft. wood-framed building was a complete loss; as fire fighting efforts were hampered by extreme cold weather and frozen water supply mains.

High voltage electrical equipment serving the plant's numerous industrial motors and lighting systems included three askarel-filled [polychlorinated biphenyl (PCB) - bearing cooling fluid] pad-mounted transformers. Although these transformers were located outdoors, they were sufficiently close to the building to be exposed to heat and falling debris. None of the transformers catastrophically ruptured, although two had some observed leakage (estimated to be 5 to 10 gallons) around the porcelain secondary bushings.

Other materials of concern involved in the plant fire included asbestos roofing felt, production materials (glues, patching compounds, etc.), waste oils, and inventories of small-container items (paints, lube oils, etc.).

On February 14, 1989, Weyerhaeuser Company contracted with HDR Engineering, Inc. (HDR) to assist in evaluating PCB-contaminated materials at the site.

1.1 PURPOSE

This report addresses three project objectives:

1) Evaluation of the results of field sampling conducted by HDR Engineering at three former PCB equipment locations,

2) Summary and evaluation of PCB sampling results provided by Weyerhaeuser,

30 Recommendation of additional measures to resolve the PCB contamination problem at locations where PCBs are present above acceptable levels.

The purpose of this project was to determine the residual levels of PCBs that remained in the spill areas after the initial emergency cleanup (stabilization) actions. If

warranted, additional cleanup and/or testing measures are to be recommended based on results of the field sampling and observations.

1.2 SITE DESCRIPTION

The mill is located near the town of Snoqualmie, Washington at the foot of the Cascade mountains in King County (Figure 1.1)

There are several surface water features in the vicinity of the mill, including the Snoqualmie River and the log pond to the south (Figure 1.2). Trenches and shallow excavations in the vicinity of the plywood plant indicate that a shallow (and possibly perched) groundwater aquifer exists under the site at a depth of approximately 2 ft at the two soil sampling sites. The piezometric gradient and direction of flow of this groundwater layer is currently unknown. However, it is likely that the extensive concrete foundations of the plywood plant create a slight depression in the piezometric surface, due to exclusion of infiltration by rainfall. This would result in a localized tendency for materials on or in the water to flow toward these areas.

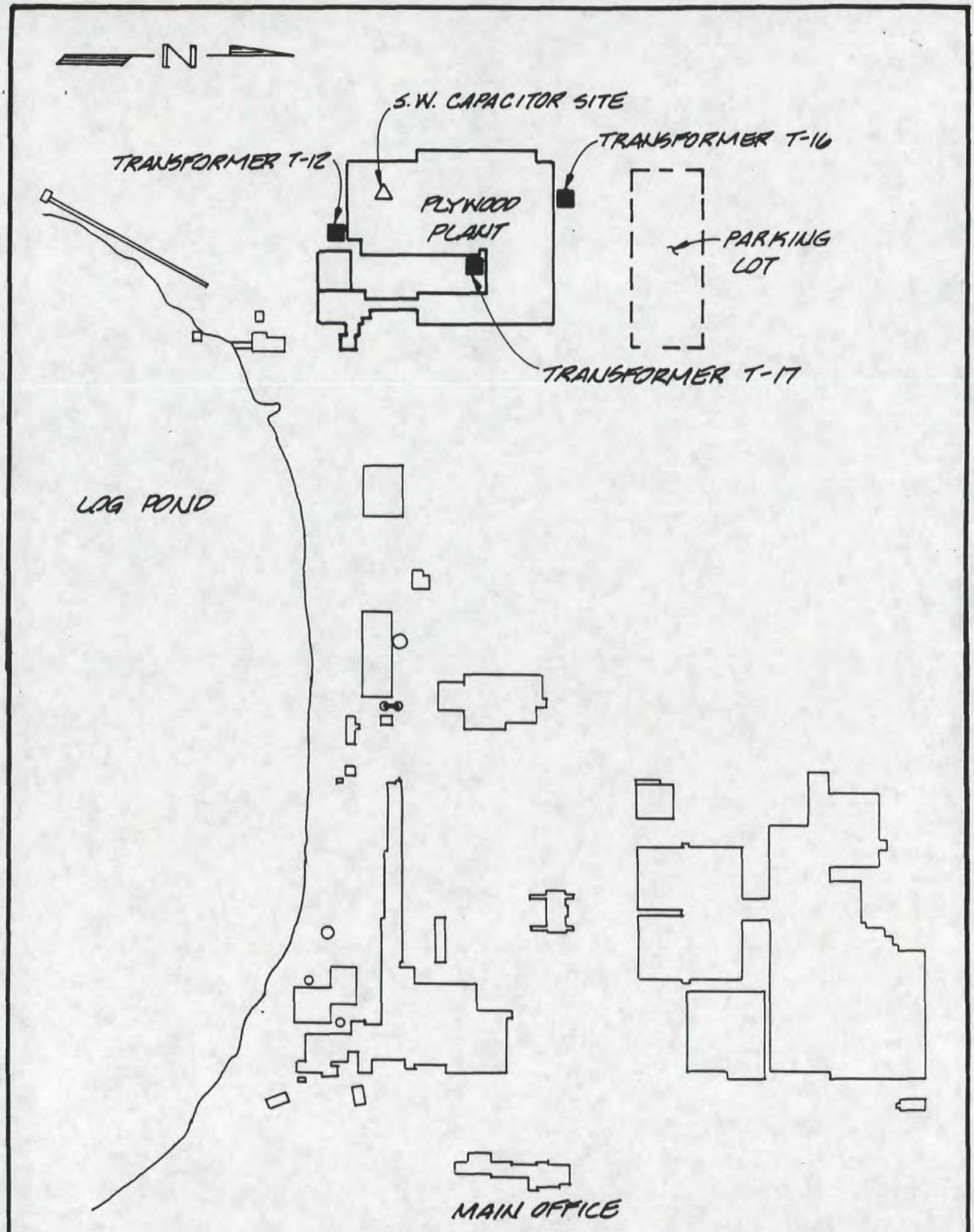
1.3 CLEANUP ACTIONS TO DATE

Three transformers serving the plywood plant contained varying amounts of askarel:

Device	Volume of Askarel (gallons)
Transformer T-17	454
Transformer T-12	454
Transformer T-16	270

Figure 1.2 shows the locations of these units. Transformer T-16 did not release any dielectric fluids and was removed as a PCB inventory reduction measure. Wipe sampling was conducted on the concrete pad at T-16 to verify the absence of PCBs.

A suspected PCB high-voltage capacitor at the plant was burned in the fire, although subsequent sampling by Weyerhaeuser did not show traces of PCB or PCB combustion products on or near this device. The unit was subsequently secured in a 55-gallon drum by the cleanup contractor and transported to General Electric's TSD facility for storage and disposal (Olympus Environmental, Inc. 1989).



SITE MAP **FIGURE 1.2**

After the fire was extinguished, Weyerhaeuser personnel installed emergency containment directly under the leaks to contain residual drippage. By February 13th, General Electric, Inc. in cooperation with Olympus Environmental Inc. (a cleanup contractor), drained the askarel from the three transformers. Carcasses and drummed fluids were released by Weyerhaeuser for transport to General Electric's facility in Portland Oregon in preparation for final disposal in accordance with the Toxic Substances Control Act (TSCA).

After removal of the transformers, the cleanup contractor removed debris in the interiors of the curbed areas surrounding the units. They removed the contaminated concrete curbing and soil immediately surrounding the structural (3 ft thick) concrete support pad. Since removal of the massive pads was not feasible at the time, the top 0.5 inch was removed using an air chisel. All waste was placed in DOT-approved drums and moved to the on-site hazardous material storage facility. The concrete and soil removal activities at Transformer Pads T-17 and T-12 generated approximately sixteen 55-gal drums full of assumed PCB-contaminated solids (Olympus Environmental, Inc. 1989). The excavated areas were covered with waterproof tarps to minimize infiltration.

A chronology of events occurring after the fire incident is included in Appendix A.

1.4 REGULATORY OVERVIEW

Regulations regarding accidental releases and cleanup of PCB fluids from in-service electrical equipment are set forth under the Toxic Substances Control Act, 40 CFR, Part 761. Subpart G defines the Spill Cleanup Policy for restricted access locations as follows:

> "...(iv) Low-contact, outdoor surfaces (both impervious and non-impervious) shall be cleaned to 100 ug/100 cm^2 ..... (v) soil contaminated by the spill will be cleaned to 25 ppm PCBs by weight."

According U.S. EPA Region 10, spills of PCB fluids that contaminate shallow groundwater systems may be of additional concern if such contamination could reasonably be expected to impact adjacent surface or groundwater resources, or drinking water wells. In such cases, remedial measures beyond the scope of that addressed under TSCA may be required. The need for additional monitoring or remedial measures would also be based on an assessment of:

- The effectiveness of removing the contaminant source (i.e. excavation of the contaminated soil)
- The estimated volume of residual PCBs and ability to migrate through the groundwater
- The feasibility, cost, and effectiveness of additional measures.

2.0 SAMPLING PROGRAM SUMMARY

2.1 PLANNED FIELD ACTIVITIES

The sampling program for the three transformer locations was devised to maximize the amount of data that could be obtained (both horizontally and vertically) with a minimum number of samples, while providing adequate coverage of the area. The proposed program was documented in the written sampling plan prepared prior to mobilization (HDR 1989).

The sampling locations at each transformer site were oriented in an "adjusted" grid system based on standard procedures for station positioning (U.S. EPA 1985 and 1986). Where soil sampling stations fell on concrete foundations, 1) a sample of ash was obtained for analysis, and 2) an additional (offset) station was located at the nearest soil area to obtain a sample.

Samples at depth were planned for stations immediately under and adjacent to the observed locations of askarel leakage.

The original inventory of planned samples included the following:

- Twenty-one surface soil samples (0 - 3 inches)
- Eight soil samples at 1 ft depth (9 - 12 inches)
- Eight soil samples at 2 ft depth (21 - 24 inches)
- Seven ash samples from stations within the fire site interior.

All samples were labeled according to the following format:

AA-NN-MM-LL-D

where:

A	=	Area (areas 12, 16 or 17)
N	=	Station Number
MM	=	Media type (SL = soil, AH = ash, WA = water)
L	=	Level (S = surface, SS = subsurface)
D	=	Depth (0 = 0 to 3 inches; 1 = 19 to 12 inches; 2 = 21 to 24 inches).

2.2 ACTUAL FIELD ACTIVITIES

The general sampling strategy proposed in the sampling plan was maintained to the greatest extent possible. However, some modifications were made in the field. Significant modifications involved the subsurface soil sampling activities. Since some of the selected stations were in areas of soil removal, sampling was initiated at the bottom of these cuts. Hence, some stations may indicate a sample from the two-foot level, with no samples obtained for the shallower 1-ft or surface levels. At some stations, adjustments were made to obtain soil samples from the faces of these excavations at the appropriate elevations. A listing of the actual soil samples obtained and submitted for analysis is included in Appendix B.

Another modification to the plan resulted when Weyerhaeuser requested wipe sampling at transformer pad T-16. This was performed using hexane-soaked gauze pads and wiping a measured square area of 100 sq. cm. The pads were immediately placed in the same type of glass sample jar used for soil samples and included in the sample inventory. The wipe tests were performed in accordance with Section 761.123 of TSCA.

The method for obtaining soil samples at depth was modified to more effectively penetrate past large cobbles. A digging bar was used to remove soil to the just above the desired sampling depth. A decontaminated trowel was then used to remove soil to the sampling depth. The sample was then obtained using the basket auger as specified in the sampling plan.

Sampling station locations were accurately located in the field in relation to the nearby plant foundations using a 100-ft surveyor's measuring tape.

2.3 GENERAL SITE ACTIVITIES

The HDR field sampling team arrived at the site on February 16, 1989. A visual survey was conducted to orient team members, and the planned effort was reviewed with the Weyerhaeuser Hazardous Waste Engineer. Sampling was performed at pad T-12 on the 16th of February. Samples from pad T-12 and T-16 were obtained on the 17th of February.

Soil or ash sample homogenization was accomplished using decontaminated stainless steel spoons and mixing bowls. During the soil homogenization process debris, rocks and other materials larger than 0.25 inch were discarded.

Homogenized soil was then spooned into the sample jars. The jars were labeled immediately at the point of sampling and logged on the chain of custody record.

2.4 SAMPLING ACTIVITIES CONDUCTED BY WEYERHAEUSER

In addition to the testing activities conducted by HDR Engineering, Weyerhaeuser personnel obtained ash, surface soil, water and wipe samples for PCB analysis. Solid matrix and water samples were obtained as non-homogenized grabs and placed in sample containers similar to those used by HDR. The analytical laboratory and protocol were also the same as those used by HDR. The results of these sampling activities are used herein to supplement the database. Test results are included in Appendix C.

3.0 SITE INVESTIGATION RESULTS

Analytical results for the HDR sampling program are included in Appendix B. Table 3.1 is a summary of the results showing PCB concentrations at the ground surface and at depth. Subsurface samples without overlying (shallower samples) were obtained from stations located in the excavation surrounding the transformer pads.

3.1 SOLID SURFACES

Wipe samples on concrete and metal surfaces were obtained by both HDR and Weyerhaeuser personnel. Samples were obtained at three former transformer locations around the perimeter of the plywood plant site. Results for each location are discussed below.

3.1.1 TRANSFORMER PAD T-12

Weyerhaeuser representatives obtained wipe samples from transformer PAD T-12 before and after the surface (approx. 0.5 inch) of the 3-ft thick slab was removed using an air chisel. Results indicated initial and final concentrations of 720,000 and 14,000 ug/100 cm^2 (Appendix C). The final level of PCBs exceeds the allowable cleanup goal of 100 ug/100 cm^2. Alternatives for further measures for this pad are discussed in Section 4.0.

3.1.2. TRANSFORMER PAD T-17

Transformer pad T-17 was treated in a similar manner as pad T-12. After removal of the upper 0.5 inch of concrete, the pad was wipe-tested by Weyerhaeuser personnel and submitted for analysis. The final concentration was 29,000 ug/100 cm^2. This 6 ft x 6 ft x 3 ft-thick concrete slab requires additional cleanup or disposal measures as discussed in Section 4.0

3.1.3 TRANSFORMER PAD T-16

Three wipe samples were obtained by HDR Engineering on February 17, 1989. The transformer at this location was drained and removed for disposal. The pad was cleaned, but not air-chiseled prior to testing. Rain drip lines, iron staining from support bars, and the location of the secondary switchgear accurately showed the previous position of the unit. Two samples (16-01 and 16-02) were obtained from 10 cm x 10 cm square areas located immediately under the former locations of the front and rear cooling fin banks. The latter sample was positioned to be as close as possible to the former location of the

TABLE 3.1 SUMMARY OF PCB ANALYTICAL RESULTS FOR SOIL AND TESTING: TRANSFORMER PADS T12, T16 AND T17

MATRIX	STATION	PCB CONCENTRATION (ppm) AS AROCLOR 1260 AT SURFACE AND DEPTH INTERVALS (DETECTION LIMIT: 0.6 ppm) 0 FT	1 FT	2FT	2.5 FT
TRANSFORMER PAD T-12					
soil	12-01	150	----	----	----
soil	12-02	35	----	----	----
soil	12-03	99	9.0	4.9	----
soil	12-04	64	----	----	----
soil	12-05	--	----	----	----
soil	12-05A	2,500	----	----	----
soil	12-06	--	----	----	----
soil	12-06A	120	----	----	----
soil	12-07	12	----	----	----
soil	12-08	16	2,200	350	----
soil	12-09	--	----	84,000	----
soil	12-09A	--	----	7,300	----
soil	12-09B	--	----	16,000	----
soil	12-10	5.0	75	38	----
ash	12-11	<0.6	----	----	----
soil	12-12	23	1.8	4.1	----
ash	12-W8	48	----	----	----
soil	12-W10	2.1	----	----	----
TRANSFORMER PAD T-17					
soil	17-01	4.2	----	----	----
soil	17-02	6.4	----	----	----
soil	17-03	20	----	----	----
soil	17-04	--	----	1.1	----
soil	17-05	--	----	36	----
soil	17-5A	170	----	----	----
soil	17-06	--	----	310	----
soil	17-6A	160	----	----	----
soil	17-07	18	----	----	----
soil	17-08	22	1.6	1.6	----
soil	17-09	--	----	4.7	3,300
soil	17-9A	--	----	270	----
soil	17-10	3.9	0.7	<0.6	----
ash	17-11	0.8	----	----	----
ash	17-12	2.7	----	----	----
ash	17-W8	4.7	----	----	----
ash	17-W09	4.3	----	----	----
ash	17-W09A	170	----	----	----
TRANSFORMER PAD T-16 (WIPE TESTS ONLY)					
wipe	16-01	13 ug/100 sq cm			
wipe	16-01	10 ug/100 sq cm			
wipe	16-03	110 ug/100 sq cm			

transformer drain valve. The third wipe sample (16-03) was obtained from the interior of the rainwater sump located in the front of the curbed area, approximately 1 ft from the west end of the trench. Results for these three samples were 13, 10, and 110 ug PCB/100 cm^2 respectively. Of these, only the sump area exceeded the 100 ug/100 cm^2 limit defined under TSCA. Additional cleanup measures for the sump are recommended in Section 5.2

3.2 SOILS

The analytical laboratory test results for PCB levels were received from the Weyerhaeuser laboratory on March 1, 1989 (Appendix B) and indicated elevated levels of PCB contamination at some of the sampling stations at both transformer locations. Figures 3.1 and 3.2 show the results at each station. Figures 3.3 and 3.4 show the PCB concentration gradients (areal extent of contamination) estimated from the station data at transformer pads T-12 and T-17, respectively. As expected, elevated levels of PCBs in soils coincided with the area of suspected askarel release from the north (secondary terminal) sides of both devices. Samples were tested for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 (typical of transformer askarel dielectrics) was the predominant aroclor encountered.

3.2.1 TRANSFORMER PAD T-12

At Transformer pad T-12, the soil and the bottom of the excavated trench (2-ft deep - sample 12-09-SL-SS-02) contained 84,000 ppm PCB. This level decreased somewhat to adjacent (5-ft distant) stations 09A and 09B, where the bottom-of-trench PCB concentrations were 7,300 and 16,000 ppm, respectively. However, these levels of PCBs in soils still indicate direct contact concentrated released fluids. Elevated levels of PCB were also noted further to the west at station 08, which had concentrations of 2,200 and 350 ppm at the 1 and 2-ft levels. Station 5A also had a surface soil PCB concentration of 2,500. The remaining stations all exhibited PCB levels below 150 ppm, typical of secondary contamination in the immediate vicinity of a concentrated spill.

Stations having a PCB concentration between 25 and 150 ppm were 01, 02, 03 04, 5A and 6A. Samples obtained at depth at station 03 indicated PCB concentrations of 9.0 and 4.9 at the 1 and 2-ft levels.

Weyerhaeuser personnel obtained a soil sample in the vicinity of transformer pad T-12 (appendix C). Station

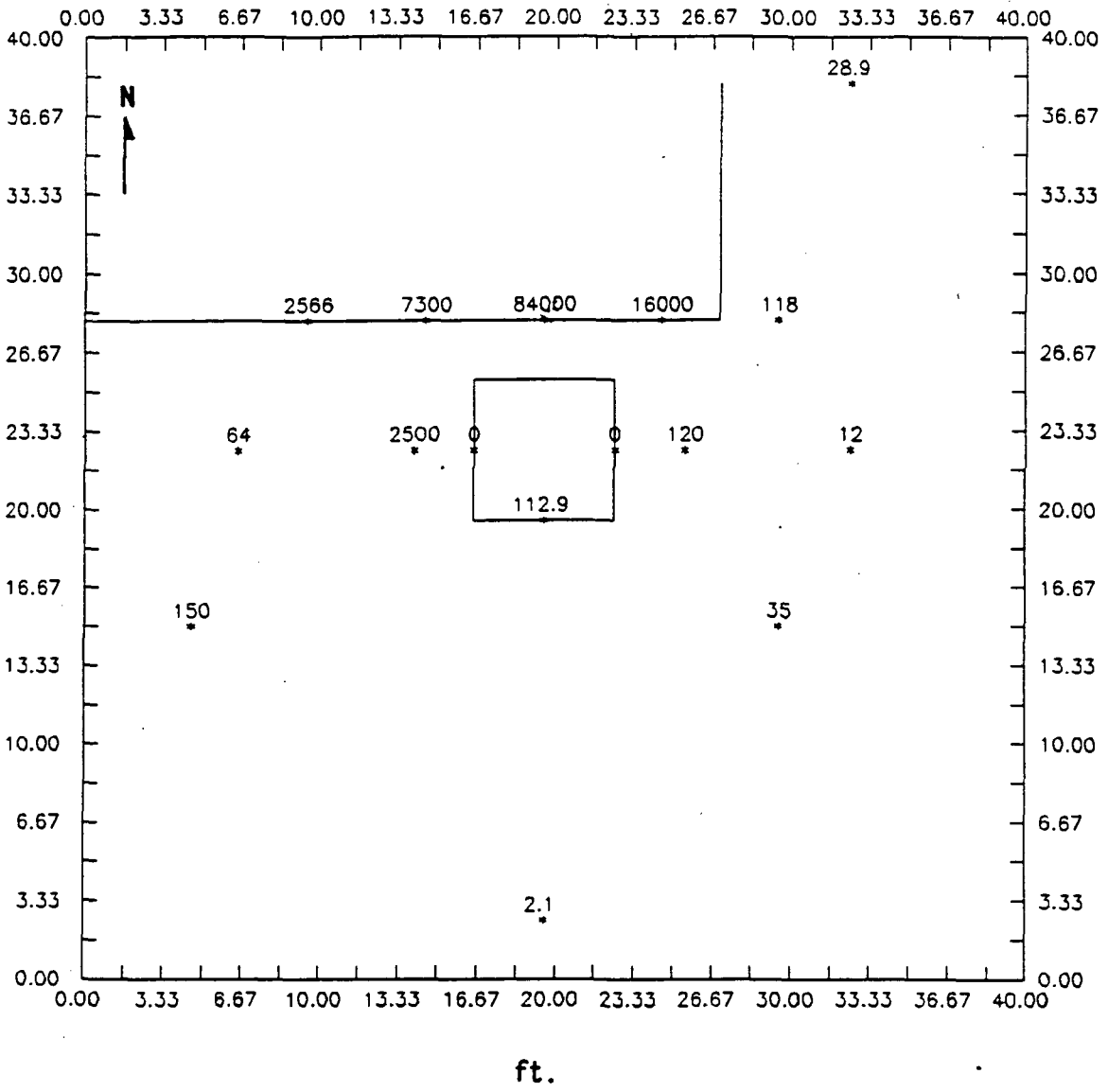


Figure 3.1 Transformer Pad T-12: PCB Concentrations at Sampling Stations (ppm)

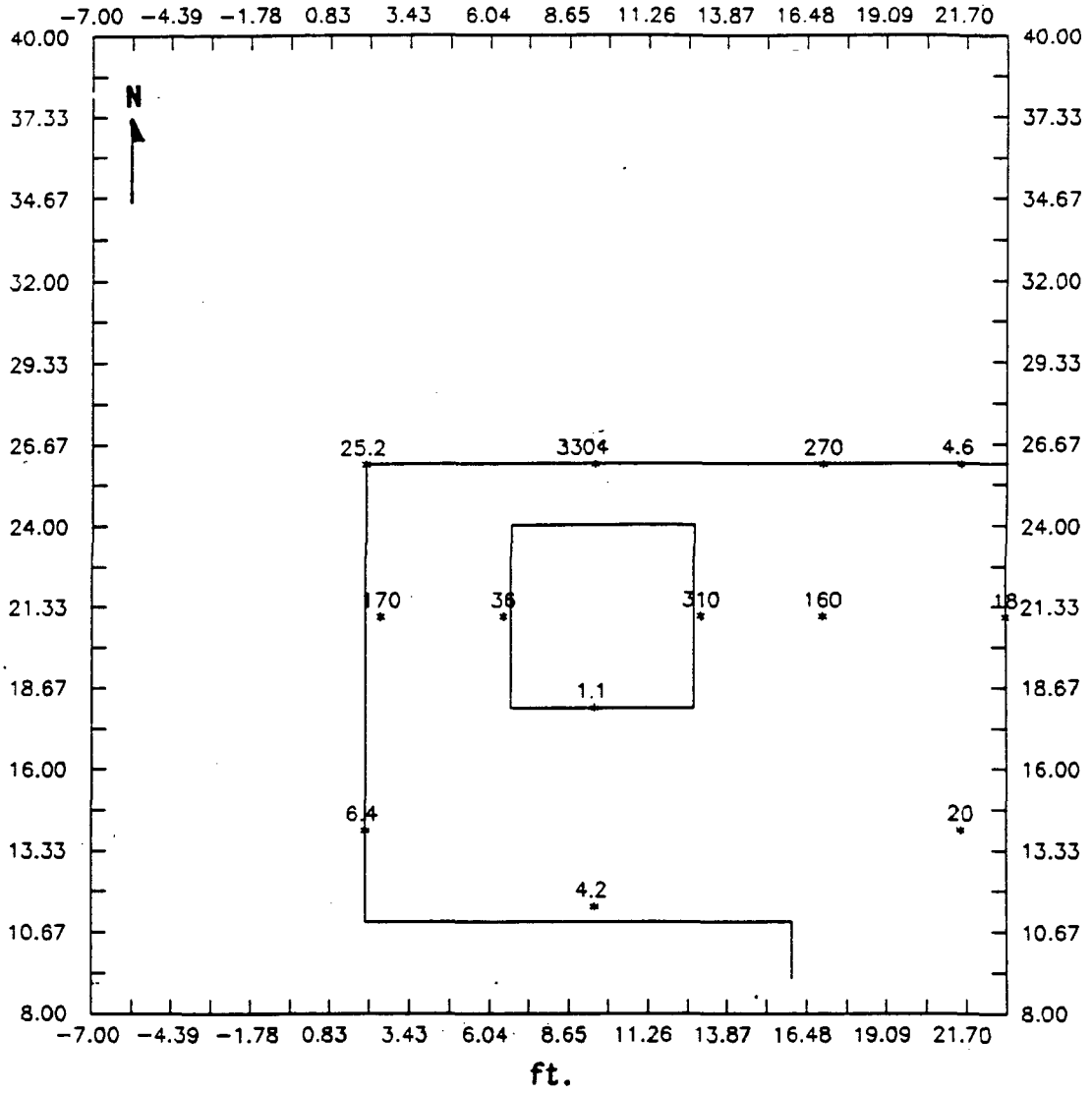


Figure 3.2 Transformer Pad T-17: PCB Concentrations at Sampling Stations (ppm)

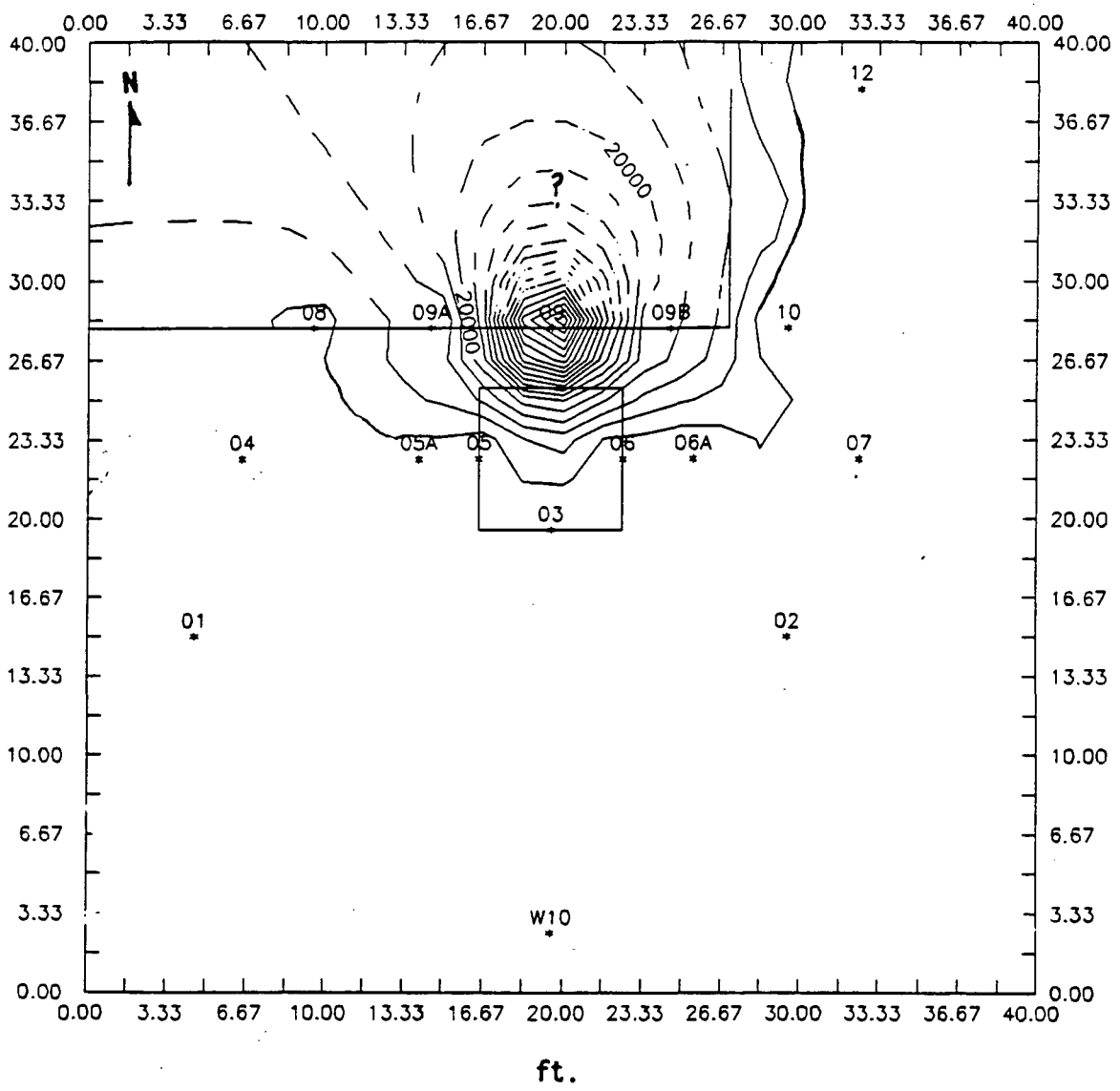


Figure 3.3 Transformer Pad T-12: Estimated PCB Concentration Gradients (summed over all sampling depths). Contour Interval: 4,000 ppm

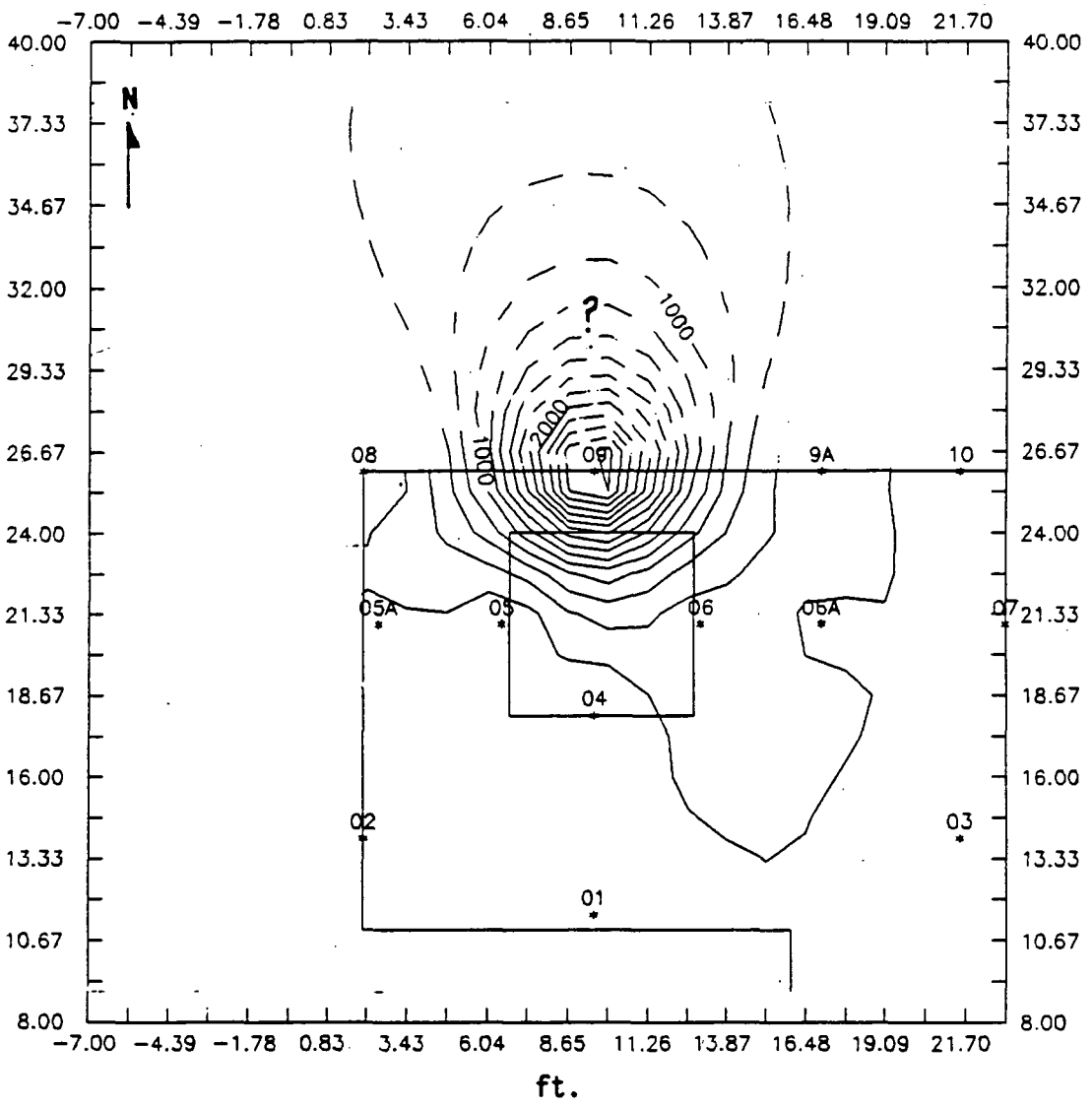


Figure 3.4 Transformer Pad T-17: Estimated PCB Concentration Gradients (summed over all sampling depths). Contour Interval: 200 ppm

number 10, located 17 ft south of the south side of the structural pad was found to contain 2.1 ppm PCB (service request no. 19013 - Appendix C). Samples obtained by Olympus Environmental (cleanup contractor) at stations 09, 09A and 09B contained 73,000, 32,000 and 10,000 ppm PCB, respectively (Appendix C - Service Request 19173. These results are comparable to those reported above.

3.2.2 TRANSFORMER PAD T-17

The levels of PCB contamination detected at transformer pad T-17 were lower than those encountered at T-12, yet still indicate the presence of spilled concentrated PCB fluids. The highest PCB level (3,300 ppm) was encountered immediately below the transformer secondary bushings (on the north side of the pad) at a depth of 2.5 ft below the original ground surface. A sample obtained immediately above at the 2 ft level (at the bottom of the trench) contained only 4.7 ppm PCBs. This overlying soil may have been dropped back into the trench during the removal of the transformer curbing.

Other sampling stations containing PCBs above 25 ppm were stations 5A, 6A 13 at the surface, and stations 05, 06, and 9A at the 2-ft depth level. All of the latter three samples were obtained at the bottom of the trench around the perimeter of the pad.

Samples obtained by Olympus Environmental (cleanup contractor) at stations 08, 09 and 09A contained 37, 2,400 and 270 ppm PCB, respectively (service request 19166 - Appendix C). These results are comparable to those reported above (25, 3,304 and 270 ppm) and further demonstrate the reproducibility of the soil testing activities.

3.3 ASH

Ash from the fire debris was sampled by HDR Engineering and submitted for PCB analysis. At transformer pad T-12, The ash from station 11 (located on the plant foundation ten feet north of soil sampling station 08 - Figure 3.1). contained less than 0.5 ppm PCB. Ash samples taken at pad T-17 from stations 11 and 12 and 14 (station 14 is a field split sample from station 12) also contained extremely low levels of PCBs: 0.8, 2.7 and 0.6 ppm, respectively.

Ash samples were also obtained by Weyerhaeuser personnel and tested for PCB content. Results for these samples are reported in Appendix C and summarized in Table 3.2 for Laboratory analysis request numbers 19013, 19039, and 10986.

TABLE 3.2 PCB CONCENTRATIONS IN ASH SAMPLES

ANALYSIS NUMBER	SAMPLE NUMBER	LOCATION	PCB CONC. (ppm)
[SAMPLES TAKEN PRIOR TO ANY CLEANUP (2/08/89)]			
10913	#1	T-12 - UNDER TRANSFORMER	550,000
10913	#5	NEAR BURNED CAPACITOR C-3	0.5
10913	#6	NEAR BURNED CAPACITOR C-3	0.5
10913	#7	T-17 - UNDER TRANSFORMER	340,000
10913	#8	15 FT WEST OF PAD T-17	4.7
10913	#9	15 FT NORTH OF PAD T-17	4.3
10913	#10	15 FT SOUTH OF PAD T-17	2.1
[SAMPLES TAKEN AT LOCATIONS IN BLDG (2/14/890]			
19039	A-1		1.6
19039	A-2		<0.1
19039	A-5		0.4
19039	A-8	T-12 ASH SOUTH OF SWITCHGR	48
19039	A-9	T-17 ASH SOUTH OF SWITCHGR	170
[SAMPLES TAKEN AT LOCATIONS IN BLDG (2/21/89)]			
19086	B-1	AREA 6 DEBRIS SITES	<0.6
19806	B-2	AREA 6 DEBRIS SITES	<0.6
19086	B-3	AREA 9 DEBRIS SITES	<0.6
19086	B-4	AREA 8 DEBRIS SITES	<0.6
19086	B-8	AREA 9 DEBRIS SITES	<0.6

Test results from the first round of testing indicate that ash materials immediately under the damaged bushings were soaked with leaked PCB fluids. These materials were subsequently cleaned up and disposed as PCB-contaminated solids. Ash outside the containment area, but immediately adjacent to the spill areas also showed elevated PCB levels of 48 and 170 ppm. These results indicate that additional wipe testing of foundations in this area may be warranted after ash cleanup (unless foundations are also removed and disposed as PCB-contaminated solids).

Results for all other stations indicate that spilled PCB fluids did not extend beyond the immediate vicinity of the localized releases at transformer pads T-12 and T-17.

3.4 GROUNDWATER

As indicated above, vertical penetration of spilled PCB fluids was evident at both transformer pad locations T-12 and T-17. At Transformer pad T-12, the highest concentration (8,400 ppm) was encountered at the 2-ft depth directly under the point of release and the next highest level (1,600 ppm) was at adjacent station 9B (5 ft to the east), also at the 2-ft depth. Similarly, at pad T-17, the highest PCB level was detected adjacent to the groundwater interface at the 2.5 ft depth, immediately below the point of leakage.

A water grab sample taken by Weyerhaeuser personnel (Appendix C - Service Request no. 19039) from the west side of pad T-12 showed a PCB level of 230 ppm. Oil-like sheens were observed on the surface of this water which was in direct contact with contaminated soil detected around the perimeter of the ditch. One grab sample of standing water in the excavated trench at pad T-17 (station 4) was obtained by HDR Engineering and submitted for PCB analysis. A concentration of 1.3 ppm PCB was detected. Olympus Environmental also obtained grab samples of water in the trench at pad T-12 and PCB concentrations were reported to be 770 and 1,310 ppm (Appendix C - Service Request 19173). These results indicate that PCB-contaminated soil in these areas is in contact with the shallow perched groundwater observed at or just below the 2-ft sampling depth. The variability in results may be due, in part, to the inclusion or exclusion of product sheens, silt, or globules at the top or bottom of the water column during sampling.

3.5 QUALITY ASSURANCE REVIEW OF PCB ANALYSES.

3.4.1 Shipping

Samples were delivered under chain-of-custody by the sampling team to Weyerhaeuser personnel on the same day they were obtained. Samples were kept cooled until analysis. The data package was received by HDR Engineering on March 15, 1989.

3.4.2 Analytical Method

Weyerhaeuser Analytical and Testing Services (Tacoma, Washington) used the U.S. EPA CLP cleanup method for medium-level soils to be tested for PCBs. The analytical method reference is EPA - 600/4/81/045 - September 1982.

3.4.3 Accuracy

Samples routinely analyzed for all aroclor matrix spikes during the same analytical period indicated a recovery ranging from 90 to 110 percent, with a mean of 100 percent.

3.4.4 Precision

To evaluate precision in the analysis of samples for PCB concentration, approximately 5 percent of the samples were collected in duplicate and analyzed "blind" by the laboratory. The following duplicate samples were obtained:

Matrix	Duplicate Samples	PCB Concentration (ppm)
Soil	17-6A-SL-S-0	160
	17-13-SL-S-0	280
Ash	17-12-AH-S-0	2.7
Ash	17-14-AH-S-0	0.6

Precision of the results are deemed acceptable under the analytical conditions and methods.

4.0 ESTIMATED EXTENT OF PCB CONTAMINATION

4.1 SOLID SURFACES

4.1.1 TRANSFORMER PAD T-12

Wipe test results presented in Section 3.1 indicate that the 6 ft x 6 ft structural concrete transformer pad at location T-12 is contaminated in excess of the allowable (TSCA) level of 100 ug/100 cm^2. The Wipe test indicated a PCB level of 14,000 ug/100 cm^2. Insufficient data exist to determine whether some or all of the slab surfaces exceed the cleanup standard and therefore the entire structure should be considered contaminated.

The concrete foundation north of transformer Pad T-12 is also likely to be contaminated above the allowable limit, although no wipe tests have been obtained to date from this area. Unlike PAD T-17, the joint between the secondary buswork duct and the transformer throat was positioned outside the containment curb at this location. Askarel released from the damaged bushings was free to drip down onto the south side of the concrete foundation under the secondary switchgear (formerly inside the building).

4.1.2 TRANSFORMER PAD T-17

Wipe test results presented in Section 3.1 indicate that the structural concrete pad at location T-17 is contaminated above the acceptable level. The residual contamination (29,000 ug/100 cm^2) indicates that spilled PCB fluids have extensively penetrated the porous matrix. Additional washing or chipping of the slab surfaces would be ineffective and would result in the generation of contaminated rinsates. Insufficient data exist to determine whether some or all of the slab surfaces exceed the cleanup standard and therefore the entire structure should be considered contaminated.

4.1.3 TRANSFORMER PAD T-16

Wipe tests indicate that transformer pad T-16 does not contain PCBs above the TSCA-established level of 100 ug/100 cm^2. However, one wipe test in the drainage collection sump at the front (north side) of the installation indicated a level of 110 ug/100 cm^2. This level can be easily reduced by surface cleaning.

4.2 SOIL AND GROUNDWATER

As mentioned above, the fate of the PCB fluids released from the two transformers was highly dependent on the positioning of the secondary bushing housing on the north sides of the units relative to the curbing immediately below. For transformer pad T-12, the fluids were able to flow outside the perimeter of the curb and onto the adjacent soils between the transformer installation and the plywood plant foundation. At transformer pad T-17, portions of the released fluid were retained inside the secondary containment area.

The precise amount of fluid released is unknown. The contractor that drained the fluids from the units after the incident reported that 385 and 440 gallons of fluid were drained from transformers T-12 and T-17, respectively (Olympus Environmental, Inc. 1989). The nameplate fluid volume listed for both units was 454 gal. Researchers (Dunlop 1986) report that approximately 12 percent of the dielectric fluid in a transformer remains in the porous core materials after draining. Hence, it can be estimated that a maximum of 23 gallons could have been released from transformer T-12. However, experience indicates that transformers seldom contain their nominal volumes. Usually, no more than 5 to 10 gallons are in place above the level of the bushings and it is most likely that this is the volumetric range for both liquid spills. This estimate does not take into account past (historical) releases of fluid that may have occurred.

4.2.1 AREAL EXTENT OF PCB CONTAMINATION

The areal extent of both fluid releases onto adjacent soils shown in Figures 3.3 and 3.4 is estimated to be approximately 100 and 35 square ft. for transformers T-12 and T-17, respectively. The extent to which contamination extended northward, either onto or underneath the former plywood plant foundations is currently unknown. It is likely that PCB contamination extends at least 2 or 3 ft northward, to the location of the secondary switchgear. Much of this was cleaned up when ash and debris in this area was deposited into drums. The extent of contamination beneath the foundations is difficult to estimate and may only be determined during further cleanup (see "Recommendations" - Section 5.0).

The areal extent of surface soil PCB contamination above 25 ppm was well defined by the sampling program at transformer pad T-17. Transformer pad T-12 included some outlying stations at elevated levels. Section 5.2 includes

recommendations for additional sampling prior to excavation to better determine the limits of required cleanup.

4.2.2 ESTIMATED DEPTH OF PCB CONTAMINATION

The results presented in Section 3.0 indicate that PCB contamination has extended beyond the 2-ft depth at both transformer pads T-12 and T-17 directly below the point of fluid release. However, the residual concentrations (less than 500 ppm) at transformer T-17 at stations other than 09 under the bushings indicate that concentrated fluid has not flowed much beyond this depth. Data indicate that the spill at transformer T-17 was limited in quantity and penetration.

The extent of penetration of fluid below the 2 ft depth at transformer T-12 requires further evaluation. Penetration into the saturated zone can be estimated based on several assumptions about the initial size of the spill, soil porosity, and other factors. A computer version of a model for evaluating the release of hydrophobic fluids onto soil surfaces (Metcalfe and Zukovs, 1986) was applied using the following assumptions:

- Worst case spill volume of 23 gal. ($= 0.087\ M^3$)
- Askarel density = $1582\ Kg/M^3$
- Abs. Viscosity = 1.88×10^{-2} Pa.Sec.
- Soil permeability = $10^{-12}\ M^2$
- Water table depth = 0.61 M
- Area of spill pool = 1 ft^2 ($= 0.093\ M^2$)

A maximum spill penetration depth of 5.83 ft (1.78 M) was predicted by the model.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

The following conclusions can be drawn from the results of the PCB sampling program conducted in conjunction with Weyerhaeuser personnel:

- PCB contamination in excess of allowable levels for restricted access areas exist on concrete surfaces and in the soils at transformer Pad locations T-12 and T-17 (maximum PCB levels of 84,000 and 3,300 ppm, respectively). Transformer pad T-16 was found to be free of elevated levels of PCBs, except in the sump. One cleaning should reduce the sump contamination to acceptable levels. Spillage at transformer pad T-12 resulted in higher concentrations and larger area due to 1) positioning of the leaking secondary bushings relative to the containment curbing, and 2) the estimated amount of fluids released.

- PCBs were detected in ash materials encountered at the fire site, but only in the immediate vicinity of transformers T-12 and T-17. These wastes have been removed and handled as PCB-contaminated solids. Ash in the general fire area (outside of the transformer installations) does not require special handling under 40 CFR 761.

- The extent of PCB contamination below the groundwater surface and under the plant foundation is currently unknown. It is estimated that penetration of PCB liquids to a depth greater than 2 ft has occurred at both locations. Predictive modeling based on worst-case assumptions indicates that fluids may have penetrated as deep as 6 ft at location T-12 (assuming the absence of a confining layer of low permeability materials). Lateral transport of this plume (if any) is unknown.

5.2 RECOMMENDATIONS

Additional cleanup measures should be undertaken to remove residual PCB contamination at transformer pads T-12 and T-17 to levels that are in compliance with the TSCA PCB Spill Cleanup Standards. The concrete support pads should be removed, sealed for transport, and disposed in accordance with controlling regulations. The cleanup contractor is currently developing a cleanup plan for the transformer

sites which includes the following elements:

- o remove the structural pad
- o obtain additional samples of water from the pad depression
- o apply absorbent material to the water (if warranted by test results) to reduce free product
- o pump down the water (if warranted by test results and infiltration is not excessive) - filter pumped water using activated carbon (Appendix D includes information on small-scale carbon treatment canisters that are appropriate for this use) and contain/monitor the discharge.
- o excavate contaminated soil for disposal.

In order to avoid multiple mobilizations of excavation equipment, Weyerhaeuser should consider conducting fast-turn around testing of soils as the excavation is progressing. This can be achieved by 1) contracting with a mobile laboratory to provide on-site gas chromatographic screening analysis, or 2) pre-arranging with Weyerhaeuser's in-house or contract laboratories for rapid turn-around. Once adjacent soils are found to contain acceptable levels of PCBs, the excavation can be backfilled with clean soil.

Immediately prior to conducting additional work at transformer pad T-12, several additional surface soil samples should be obtained west of stations 04 and 08, south of station 04, and east of stations 10 and 12 for further delineate the zone of PCB contamination above 25 ppm.

Because of the involvement of groundwater in direct contact with concentrated PCB fluids, Weyerhaeuser should consider installation of several shallow groundwater monitoring wells in the immediate vicinity of both transformer locations. During installation of the wells, a geologist will be able to determine whether there are impermeable confining layers (i.e. clay) that are retarding downward migration of dense materials. If necessary, such a layer may be useful in limiting groundwater flow into or out of the contaminated soil mass during excavation. An assessment should also be performed to determine whether there are drinking water wells in the area. An outline work plan for this effort will be provided under separate cover.

Upon completion of cleanup at the two transformer sites,

Weyerhaeuser should prepare a final cleanup report addressing all items called for under 40 CFR, Section 761.125 - Records:

- Identification of the source of the spill, e.g., type of equipment
- Estimated or actual date and time of the s pill occurrence
- The date and time cleanup was completed.
- A brief description of the spill location and the nature of the materials contaminated. This information should also indicate that the spill occurred in a restricted access location
- Pre-cleanup sampling data (as presented in this report) used to establish the spill boundaries if required because of insufficient visible traces and a brief description of the sampling methodology used to establish the spill boundaries.
- Description of the surfaces cleaned [or removed]
- Approximate depth of soil excavation and the amount of soil removed
- Post-cleanup verification sampling data and, if not otherwise apparent from the documentation, a brief description of the sampling methodology and analytical technique used.

The report should also include data on groundwater quality (testing for PCBs and chlorinated benzenes) and actions (if warranted) to reduce contaminant levels in groundwater. This report should be retained in the Weyerhaeuser Company files as evidence of rapid and responsible action as called for by regulation.

6.0 REFERENCES

HDR Engineering, Inc. 1989. Sampling Plan - Weyerhaeuser's Cascade Division Snoqualmie Falls Plywood Plant Fire Site. February 1989.

Metclafe, Douglas E, and George Zukovs. 1986. A Rapid Assessment Model for Spills on Soil of Oily Fluids that are Immiscible with Water. Proceedings of the National Water Well Association's Conference on Petroleum Hydrocarbons and Organic Chemicals in Groundwater: Prevention, Detection and Restoration. 1986.

Olympus Environmental, Inc. 1989. Letter from Kelly Tjaden to Mick McCourt regarding Emergency Response - PCB Transformers and Debris - Weyerhaeuser Plywood Mill Site, Snoqualmie, Washington. February 16, 1989.

U.S. Environmental Protection Agency. 1985. Verification of PCB Spill Cleanup by Sampling and Analysis. U.S.EPA Office of Toxic Substances, Washington DC. August 1985.

U.S. Environmental Protection Agency. 1986. Field Manual For Grid Sampling of PCB Spill Sites to Verify Cleanup. U.S. EPA Office of Toxic Substances, Washington DC. May 1986.

APPENDICES

A. CHRONOLOGY OF EVENTS FOLLOWING THE FIRE INCIDENT

B. ANALYTICAL RESULTS FROM HDR PCB SAMPLING PROGRAM

C. WEYERHAEUSER PCB SAMPLING - SUPPLEMENTARY ANALYTICAL RESULTS.

D. SMALL-SCALE ACTIVATED CARBON TREATMENT CANISTERS: EXAMPLE PRODUCT LITERATURE

APPENDIX A

CHRONOLOGY OF EVENTS FOLLOWING THE FIRE INCIDENT

Interoffice Communication

Weyerhaeuser

Date February 24, 1989

From J. E. 'Mick' McCourt

Location WTC 2H4

Subject INCIDENT REPORT SUMMARY FOR SNOQUALMIE FALLS PLYWOOD PLANT FIRE

To R. Proctor - CH 1M31

On February 5, 1989 about 7:00pm, the first response to the Plywood Plant fire was made to turn off the power to the plant and notify the Snoqualmie Fire Department about 7:04pm. The site was evacuated except for emergency response personnel. The fire protection system failed due to extreme cold weather that had frozen up the system. In fact, the surface water supplies were frozen in close proximity to the plant and were also unavailable to the fire fighting actions. By 11:00pm the Plywood Building was declared a complete loss and allowed to burn out by the emergency response personnel. Winds were gentle to the North, away from most local households and city center of Snoqualmie.

By Monday afternoon, February 6, 1989, the Plywood Plant had cooled down enough to inspect the site. Two PCB transformers were found by L. Clark (shop operations) to have leaked an estimated one to ten gallons into their containment area (Transformers T-12 and T-17). It was later found that about one to five gallons was spilled from these transformers and that the transformers' temperature gauges' readings maximum were likely between 176 to 383°F. A third transformer, T-16, had not leaked and its temperature gauge reading maximum was 113°F. Mr. Clark notified R. Proctor, Weyerhaeuser's Regional Environmental Affairs Manager, of this condition which Mr. Proctor then reported to U.S. Environmental Protection Agency's National Response Center. Upon completing this notification, Mr. Proctor notified Mr. McCourt, Hazardous Waste/Materials Engineer, of the PCB spill event. Mr. McCourt began steps to identify qualified PCB cleanup contracts. Mr. Clark initiated efforts to remove overhanging debris site hazard associated with PCB transformers.

On February 7, 1989, a follow-up preliminary site investigation by L. Clark and J. McCourt discovered a suspected PCB capacitor (C-3) was burned in the fire near the Press Pit Area of the Plywood Plant. This site area was added to the PCB cleanup effort. Light ballasts were also noted in the fire debris, however, many of the light ballasts had nameplates that indicated non-PCB items.

Qualified PCB cleanup contractors were identified as well as overview sampling was conducted on February 7 and 8 1989. By February 9, 1989, General Electric Industry Sales and Service was selected to transport, cleanse and dispose of liquid PCBs, three transformer carcasses and suspected PCB capacitor. Olympus Environmental, Inc. was selected to decontaminate the PCB transformers and decontaminate the transformer pad and visual contaminated soils. HDR Engineering, Inc. was selected to do the site assessment work for the three initial phases of PCB cleanup. It is expected that additional PCB contaminated debris removal will be needed and that the completion of the PCB spill cleanup will be then certified.

The PCB cleanup emergency response was divided into four phases:

1. First Response: PCB transformers and suspect PCB capacitor removal completed on February 11, 1989, by GE and Olympus Environmental.

2. Second Response: Site assessment sampling and assessment work began February 8 through 16 with overview sampling. Grid sampling of PCB Transformers T-12, T-16, T-17 areas took place on February 16 and 20, 1989. HDR will be assessing the need for additional PCB debris removal or cleanup options before the certification of PCB spill cleanup.

3. Third Response: Additional PCB contaminated debris removal by Olympus Environmental and certification of PCB spill cleanup by HDR. This phase of the cleanup will depend on the findings of the site assessment.

4. Fourth Response: Identification and removal of other dangerous waste or hazardous material (HAZMAT). The findings to date suggest that chemical HAZMAT removal and asbestos HAZMAT removal will be necessary. A two step process will be used to remove these materials. The first step is removal of readily identifiable barrels, tanks and contaminated debris and asbestos sources. The second step will be the removal of roofing asbestos, contaminated ash and yet to be discovered HAZMAT chemicals.

Table 1 outlines the progress to date and schedules for remaining emergency response and HAZMAT removal actions.

It is anticipated that records and certification will be prepared to satisfy PCB regulations (40 CFR 761.125). Records and Certification Requirements include the following:

1. Identification of the source of the PCB spill which currently only includes Transformers T-12 and T-17.

2. Estimated or actual date and time of spill occurrence from February 5, 1989 7:00pm to February 11, 1989 with removal of both Transformers T-12 and T-17.

3. The date and time cleanup was completed or terminated. The first phase of PCB transformer and suspected PCB capacitor removal was completed on February 11, 1989. Subsequent Phases 2 and 3 of the Emergency Response are expected to be completed in the next few months or sooner.

4. A brief description of the spill location will be included in the HDR site assessment report.

5. Precleanup sampling data used to establish the spill boundaries, if required because of insufficient visible traces, and a brief description of sampling methodology used to establish the spill boundaries. First sampling to overview the site included sampling of the containment spill debris, 15 feet from the containment areas, general Plywood ash and asbestos sampling, and liquid wastes. Suspected PCB capacitor sampling was also initiated with PCB, dioxins and furans under the capacitor, C-3, and 15 feet west of the capacitor. Second sampling phases will include grid sampling of Transformers T-12 and T-17 and

wipe sampling of transformer pad areas. A third sampling phase using 6 to 12 point area composite ash sample was taken to profile the plywood plant ash debris as a nondangerous, potentially asbestos-contaminated waste.

6. A brief description of the solid surfaces cleaned and of the double wash/rinse method used. The contaminated surface was initially removed by chipping away the contaminated containment area and pad to reduce the penetration of PCB into the two- to three-foot-thick transformer pad.

7. Approximate depth of soil excavation and amount of soil removed was initially two to three feet under the containment perimeter.

8. A certification statement signed by the responsible party stating that the cleanup requirements have been met and that the information contained in the record is true to the best of our knowledge.

These requirements are anticipated to be part of the site assessment scheduled to be completed by HDR in the next few months or sooner.

Additional PCB cleanup reports and technical memorandum will follow to keep you informed on the PCB spill cleanup for Snoqualmie Falls Plywood Plant transformers and capacitor.

Mick McCourt

J. E. 'Mick' McCourt

esw/c10/0222

cc: J. Traylor - Springfield 85
L. Clark - Snoqualmie 81
V. Moore - Snoqualmie 81
D. Sjolseth - WTC 2H2
C. Carlson - WTC 1D2

Table 1
Chronology of Snoqualmie Falls Plywood Plant
Fire, PCB Cleanup and HAZMAT Emergency Response
February 5 to 16, 1989

2-5-89	Fire event and initial emergency response.
2-6-89	Discovery of PCB spill noted at Transformers T-12 and T-17. Notification made to National Response Center of PCB spill. PCB spillage appears to be contained by concrete floor and curbs at Transformers T-12 and T-17 and is estimated at one to five gallons per transformer.
2-7-89	Identification of PCB cleanup contractors and preliminary sampling site location survey. Suspected PCB capacitor, C-3, observed inside plant. Initial debris removal began to allow access to sites.
2-8-89	First series of soil and ash samples taken in or near Transformers T-12 and T-17 and Capacitor C-3 to overview PCB, dioxins and furans and dangerous waste criteria. Level C personnel protection gear used to obtain samples.
2-9-89	PCB cleanup contractors selected. Asbestos sampling initiated on site. Work plans submitted for PCB transformer removal effort including health and safety and sampling plans for PCB transformers.
2-10-89	Olympus Environmental initiates PCB transformer draining and pad cleanup at Transformer T-16, non leaking PCB transformer and T-12 and T-17.
2-11-89	GE removes drained and cleaned PCB transformers to their Portland TSDF. Manifested PCB items include three transformers, about 25,000 lbs; 19 drums of PCB liquid, about 12,550 lbs; seven drums of PCB contaminated cleanup debris, about 3,150 lbs; and one drum of suspected PCB capacitor, about 12 lbs.
2-12 to 16-89	PCB transformer pad and PCB contaminated soil removal continues. Contaminated debris placed in salvage drums and stored temporarily in Hazardous Waste/PCB Storage Area. Additional asbestos sampling takes place.
2-12 to 14-89	PCB, dioxin and furan wipe samples taken to certify the PCB transformer pads and suspected PCB capacitor debris cleaned to 40 CFR 761 requirements.
2-13-89	Second series of soil, hydraulic oil, water and ash sampies taken to clarify and overview PCB contamination and dangerous waste issues.

2-14-89	Work plans for HAZMAT chemical removal submitted for general drums, tanks and chemical contaminated debris by Olympus Environmental.
2-15-89	Work plans submitted for five specific high concentration asbestos sites 23-1, 23-2, 23-3, 23-4 and 23-5 by Enviro-Comply. Press pit water sampled for PCB, BNA's and total metals scan.
2-16-89	PCB site assessment work began by HDR Engineering, Inc. according to submitted sampling and health and safety plans on Transformer Pad T-12. Chemical and asbestos HAZMAT removal is in progress.
2-21-89	Asbestos abatement work completed on with five areas. Third round of overview sampling of ash initiated to characterize waste for disposal at Cedar Hills landfill.
-	HAZMAT asbestos cleanup certification, HAZMAT drum consolidation and completion of HDR PCB cleanup site assessment sampling 2/22/89.
-	Gross asbestos contaminated ash removal, asbestos abatement and demolition to certify plywood plant cleared of HAZMAT chemical and asbesto hazards by 2/27/89 or sooner.
-	Complete HAZMAT chemical and asbestos abatement work by 3/17/89.
-	PCB cleanup site assessment reports by 4/1/89 or sooner.
-	Complete demolition of plywood plant to grade by 5/15/89.

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Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE CLEANUP SOIL/WATER/WIPES

Aroclor Analysis

Twenty two soils, three wipes and two waters were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soils and 0.06 ppm in the water.

Amount in PPM (ug/g)

17-5A-SL-S-0	170	
17-05-SL-SS-2	36	
17-6A-SL-S-0	160	
17-04-SL-SS-02	1.1	
17-07-SL-S-0	18	
17-13-SL-S-0	280	
17-02-SL-S-0	6.4	
17-03-SL-S-0	20	
17-01-SL-S-0	4.2	
17-06-SL-SS-02	310	
17-12-AH-S-0	2.7	
17-14-AH-S-0	0.6	
17-9A-SL-SS-2	270	
17-08-SL-S-0	22	
17-10-SL-S-0	3.9	
17-11-AH-S-0	0.8	
17-09-SL-SS-2.5	3300	
17-09-SL-SS-2	4.7	
17-10-SL-SS-2	<0.6	
17-08-SL-SS-2	1.6	
17-10-SL-SS-1	0.7	
17-08-SL-SS-1	1.6	
16-01-WP-S-0	13	ug in wipe
16-02-WP-S-0	10	ug in wipe
16-03-WP-S-0	110	ug in wipe
17-00-WA-B-0	<0.06	
17-04-WA-SS-2	1.3	

Approved _____ Date 3/10/89 Notebook_____

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Report

SNOQUALMIE FALLS PCB SURVEY/CLEANUP PROJECT

Aroclor Analysis

Twenty two soils and one water were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soils and 0.06 ppm in the water.

	Amount in PPM (ug/g)
12-08-SL-SS-2	350
12-9B-SL-SS-2	16000
12-09-SL-SS-2	84000
12-08-SL-SS-1	2200
12-9A-SL-SS-2	7300
12-02-SL-S-0	35
12-01-SL-S-0	150
12-07-SL-S-0	12
12-04-SL-S-0	64
12-12-SL-S-0	23
12-6A-SL-S	120
12-10-SL-SS-2	38
12-10-SL-SS-2	75
12-08-SL-S-0	16
12-11-AH-S-0	0.5
12-10-SL-S-0	5.0
12-03-SL-SS-1	9.0
12-12-SL-SS-1	1.8
12-5A-SL-S-0	2500
12-03-SL-S-0	99
12-12-SL-SS-1.5	4.1
12-03-SL-SS-2	4.9
12-00-WA-B-0	1.1

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Page Number _____

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Report

SNOQUALMIE SOIL/ASH SAMPLES

Aroclor Analysis

Three soil samples and one EPA reference transformer oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Aroclor 1260 was detected in all the samples with the results summerized below.

The recovery of the EPA reference sample was 94%.

T-17	Soil	3/8/89 @3:30pm	23000 ppm
T-17W	Soil	3/8/89 @3:30pm	37 ppm
T-17E	Soil	3/8/89 @3:30pm	270 ppm

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Page Number _____

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Report

SNOQUALMIE CLEANUP OIL

Aroclor Analysis

One oil sample (A-14 oil switch) was analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 at the quantitation limit of 0.1 ppm (ug/Kg). Aroclor 1260 was found at the level of 4.1 ppm.

An EPA reference transformer oil was also analyzed in duplicate. The recovery was 102% and 106%. The level of the reference was 18 ppm.

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APPENDIX C

WEYERHAEUSER PCB SAMPLING
SUPPLEMENTARY ANALYTICAL RESULTS

Tacoma, Washington

CHAIN OF CUSTODY RECORD

PROJECT NUMBER	TASK	Samplers (signatures)
1 1 T 1 1 1	1	J. E. McCourt

Sample Designation	Lab Code	Collection Time	Collection Date	Analyses Required
★ #1 T-12 Under XFMR	2 —	4:58 PM	2-8-89	PCB
sent to I.T. 2-9-89 cc #2 C3 Snoe Falls		5:13 PM	2-8-89	Dioxins & Furans
#3 C3 Snoe Falls		5:13 PM	2-8-89	Dioxins & Furans
#4 C3 - 15ft W.		5:40 pm	2-8-89	Dioxins & Furans
★ #5 Surface Sample same as 2 & 3		5:45 PM	2-8-89	PCB
★ #6 Surface Sample same as 4		5:50 PM	2-8-89	PCB, Fish Bioassay
★ #7 Under Bridge of T-17		6:50 PM	2-8-89	PCB
JCM #8 15ft W. of T-17		6:03 pm	2-8-89	PCB, Fish Bioassay
#9 15ft N of T-17		6:05 pm	2-8-89	PCB, Fish Bioassay,
#10 15ft S of T-12		6:10 pm	2-8-89	PCB, Fish Bioassay, E

Method of Shipment Personal Vehicle

Dispatched by: (signature)	Time	Date	Received for Laboratory by: (signature)	Time	Date
J. E McCourt	8:00	2-8-89	Cathryn Conroy	9:28 am	2-9-

Comments Held in Mr. McCourt's custody / sent to WTC business

Relinquished by: (signature)	Received by: (signature)	Time	Date
Comments			
Comments			
Comments			
Comments			

RECORD BOOK
PAGE NUMBER

Weyerhaeuser Research and Development - Analysis and Testing | Request Number: 19013

Title: (7) SNOQUALMIE FALLS SOIL SAMPLES FOR PCB'S		
Number of Samples: 7	Project Number: 046-5601	Groups: 1,3
Date Received: 02/09/89	Date Desired: 02/10/89	Estimated Completion Date:
Submitted By: MCCOURT, J.E.	Location: WTC 2H4	Telephone: 6513
Reviewed By: CATALANO, Dennis	Location: 2F 25	Telephone: 924-6242
Copy To:		

Sample Description and History:

PCB'S ON ALL; IF ENOUGH SAMPLE, BIOASSAY, THEN EPTOX-METALS IN THAT ORDER ON SPECIFIC SAMPLES. ***PLEASE TAKE MINIMUM AMOUNT OF SAMPLE BECAUSE DIOXIN ANALYSIS MAY BE REQUESTED LATER.***

Series	Test Code - Report Range - Test Description
Groups	Report Basis - Lower Limit of Sensitivity

A	PCB-S	-	- PCB - Solid
1		-	
B	BIOASSAY	-	- Bioassay - Fish Lab
0		-	
C	EPT-EM	-	- EP Toxicity (Extraction and metals)
3		-	

Sample Number	Series to Be Evaluated	Submitter's Designation
24392	A	#1 T-12 UNDER XFMR 2/8/89 @ 4:58 PM
24393	A	#5 SURFACE SAMPLE 2/8/89 @ 5:45 PM
24394	ABC	#6 SURFACE SAMPLE 2/8/89 @ 5:50 PM
24395	A	#7 UNDER BASE OF T-17 2/8/89 @ 6:00 PM
24396	ABC	#8 15 FT. E. OF T-17 2/8/89 @ 6:03 PM
24397	ABC	#9 15 FT. N. OF T-17 2/8/89 @ 6:05 PM
24398	ABC	#10 15 FT. S. OF T-12 2/8/89 @ 6:10 PM

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved:		Date: 2-16-89	Signature applies to attached pages		Page Number:

Printed on: 02/09/89 Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE FALLS SOIL SAMPLES FOR PCB's

Aroclor Analysis

Seven oil in soil samples and an EPA trasformer reference oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260 by EPA CLP medium level soil analysis. All samples contained Aroclor 1260, with the results summerized bellow.

#1 T-12 Under Transformer	2-8-89 @4:58 pm	55%
#5 Surface Sample	2-8-89 @5:45 pm	0.5 ppm
#6 Surface Sample	2-8-89 @5:50 pm	0.5 ppm
#7 Under Base of Transformer	2-8-89 @6:00 pm	34%
#8 15 ft East of Transformer	2-8-89 @6:03 pm	4.7 ppm
#9 15 ft North of Transformer	2-8-89 @6:05 pm	4.3 ppm
#10 15 ft South of Transformer	2-8-89 @6:10 pm	2.1 ppm

The EPA reference was analyzed at 11.4 ppm. The recovery was 103%.

Approved _____ Date 2/13/89 Notebook_____

Page Number _____

ANALYTICAL LABORATORY SERVICES REQUEST

Weyerhaeuser Research and Development - Analysis and Testing

Request Number: 19039

Sample Number	Series to Be Evaluated	Submitter's Designation
24466	ABCD	A-1 COMPOSITE ASH
24467	ABCD	A-2 COMPOSITE ASH
24468	A C E	A-3 HYDRAULIC OIL *METALS - CR,CD,AS,PB
24469	ABCD	A-4 GLUE AREA SURFACE SAMPLE
24470	ABCD	A-5 ASH COMPOSITE
24471	ABCD	A-6 GLUE WASTE
24472	A F	A-7 WATER FROM T-12 WESTSIDE SLAB
24473	A	A-8 T-12 BASE ASH SAMPLE NEAR SWITCH GEAR
24474	A	A-9 T-17 BASE ASH SAMPLE NEAR SWITCH GEAR
24475	A	SNOQUALMIE CAPACITOR WIPE

ANALYTICAL LABORATORY SERVICES REQUEST

Weyerhaeuser Research and Development - Analysis and Testing

KMPH

Request Number: 19039

Title: (10) SNOQUALMIE ASH/WASTE/OIL/WATER SAMPLES

Number of Samples: 10	Project Number: 046-5601	Groups: 1,3,4,FISH LAB
Date Received: 02/14/89	Date Desired: 02/16/89	Estimated Completion Date:
Submitted By: MCCOURT, J.E.	Location: WTC 2H4	Telephone: 6513
Reviewed By: CATALANO, Dennis	Location: 2F 25	Telephone: 924-6242
Copy To:		

Sample Description and History:

CLP METALS TO INCLUDE HG, AS. PLEASE NOTE PCB'S WERE CODED AS PCB-S, HOWEVER, SAMPLE A-3 IS AN OIL, A-7 IS A WATER. THE CAPACITOR WIPE HAS BEEN SPLIT OUT TO I.T. FOR DIOXIN & FURAN ANALYSIS.

Series / Groups	Test Code - Report Range - Test Description / Report Basis - Lower Limit of Sensitivity
A 1	PCB-S - - PCB - Solid
B 0	BIOASSAY - - Bioassay - Fish Lab
C 3	CLPMET-S - - Metals - CLP in Soil or Sludge
D 3	CORR/3 - - Corrosivity
E 4	TX - OIL - -
E 4	IGNIT - - Ignitability - flash point
F 1	BNA-WW - - Base Neutral Acid - Water (625)

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved:		Date: 2-16-89	Signature applies to attached pages		Page Number:

Printed on: 02/14/89

Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE ASH/WASTE/OIL/WATER SAMPELS

Aroclor Analysis

Eight soil/waste, one wipe, one water sample and an EPA transformer reference oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260 by EPA CLP medium level soil analysis. Aroclor 1260 was detected in some of the samples, with results summerized bellow.

Amount is in PPM (except capacitor wipe)

A-1 COMPOSITE ASH	1.6
A-2 COMPOSITE ASH	<0.1*
A-3 HYDRAULIC OIL	<0.1
A-4 GLUE AREA SURFACE SAMPLE	<0.1
A-5 ASH COMPOSITE	0.35
A-6 GLUE WASTE	<0.1
A-7 WATER FROM T-12 WESTSIDE SLAB	230
A-8 T-12 BASE ASH SAMPLE NEAR SWITCH GEAR	48
A-9 T-17 BASE ASH SAMPLE NEAR SWITCH GEAR	170
SNOQUALMIE CAPACITOR WIPE	0.3 ug/sample

*indicates Aroclor 1260 was detected below the quantitation limit

The capacitor wipe indicates that some Aroclor 1260 was detected but cannot be quantitated (the wipe is not a quantitative amount).

The water sample was cloudy with a small amount of an oily substance present - some appeared to be heavier than water.

The EPA reference transformer oil (WP 380 Concentrate #3) gave a recovery of 103% at a level of 18 PPM of Aroclor 1260.

Approved _____ Date 2/16/89 Notebook_____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE PRESS PIT WATER

Aroclor Analysis

One water sample (PRESS WATER PIT 2-15-89 @2 PM) was analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260. No Aroclors were detected at or below the following quantitation limits:

Aroclor 1221	1.0 PPM
Aroclor 1016	0.1 PPM
Aroclor 1232	0.1 PPM
Aroclor 1242	0.1 PPM
Aroclor 1248	0.1 PPM
Aroclor 1254	0.1 PPM
Aroclor 1260	0.1 PPM

Approved [signature] Date 2/17/89 Notebook _____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE FIRE CLEANUP PROJECT WATER AND SOIL

Aroclor Analysis

One soil sample and one water sample were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soil and 0.06 ppm in the water.

Amount in PPM (ug/g)

A-12 SOIL FROM NEAR NULOC	<0.6
A-13 SITE 6 PLYWOOD BLDG RUNOFF	<0.06

Approved _____ Date 2/27/89 Notebook_____

Page Number _____

Weyerhaeuser Research and Development - Analysis and Testing | Request Number: 19086

Title: (5) SNOQUALMIE CLEANUP ASH		
Number of Samples: 5	Project Number: 046-5601	Groups: 1,3 FISH LAB
Date Received: 02/22/89	Date Desired: 02/24/89	Estimated Completion Date:
Submitted By: MCCOURT, MICK	Location: WTC 2H4	Telephone: 6513
Reviewed By: CHRISTIAN, Jeff	Location: 2F 25	Telephone: 924-6013
Copy To:		

Sample Description and History:

BULK DEN= BULK DENSITY

Series	Test Code - Report Range - Test Description
Groups	Report Basis - Lower Limit of Sensitivity

A	EPT-EM	-	- EP Toxicity (Extraction and metals)
3		-	
A	CORR/3	-	- Corrosivity
3		-	
A	SOLIDS/3	-	- Solids
3		-	
A	BULK DEN	-	-
3		-	
B	PCB-S	-	- PCB - Solid
1		-	
C	BIOASSAY	-	- Bioassay - Fish Lab
		-	

Sample Number	Series to Be Evaluated	Submitter's Designation
24757	ABC	B-1 AREA 6 SITES 7/8 2/21 10:00AM
24758	ABC	B-2 AREA 6 SITES 9/10 2/21 10:09AM
24759	ABC	B-3 AREA 9 SITE 36 2/21 10:50AM
24760	ABC	B-4 AREA 8 SITES 37/38/40 2/21 10:22AM
24761	ABC	B-8 AREA 9 SITES 31/33/35 2/21 11:00AM

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved: Jeff Christian	Date: 2-28-89	Signature applies to attached pages			Page Number:

Printed on: 02/22/89

Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE CLEANUP ASH

Aroclor Analysis

Five ash/water samples were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the ash.

Amount in PPM (ug/g)

B-1 AREA 6 SITES 7/8 2/21 10:00 AM	<0.6
B-2 AREA 6 SITES 9/10 2/21 10:09 AM	<0.6
B-3 AREA 9 SITES 36 2/21 10:50 AM	<0.6
B-4 AREA 8 SITES 37/38/30 2/21 10:22 AM	<0.6
B-8 AREA 9 SITES 31/33/35 2/21 11:00 AM	<0.6

Approved _____ Date 2/22/89 Notebook_____

Page Number _____

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

5815 Middlebrook Pike • Knoxville, Tennessee 37921 • 615-588-6401

CERTIFICATE OF ANALYSIS

TO: Weyerhaeuser Analytical Chemistry
ATTN: Dennis Catalano
32901 Weyerhaeuser Way South, WTC 2F25
Federal Way, WA 98003

DATE REPORTED: February 21, 1989
PROJECT CODE: WEY 42825
ORDER NUMBER:

Sample Description: Five (5) extracts received February 17, 1989

Concentration units are total µg

	Aroclor 1016, 1232 1242† and/or 1248	Aroclor 1254	Aroclor 1260	Total Aroclors
BB1109,T-12 Slab Wipe	<12,000	<26,000	720,000	720,000
BB1110, Wipe Throat	<18,000	<25,000	1,500,000	1,500,000
BB1111,T-17 Clean	<360	<500	29,000	29,000
BB1112,T-12 Clean	<180	<250	14,000	14,000
Blk 1337, Reagent Blank	<10	<10	<10	<10

†Sample Aroclor pattern identified and/or calculated as Aroclor 1242.

Approved by: Alyce L. Moore
Laboratory Manager

Title

Accredited by the American Association for Laboratory Accreditation in the chemical

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Recd by HDR
3/22/89

Report

SNOQUALMIE SOIL/ASH SAMPLES

Aroclor Analysis

Three soil samples and one EPA reference transformer oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Aroclor 1260 was detected in all the samples with the results summerized below.

The recovery of the EPA reference sample was 94%.

The soil T-17 gave a result much higher than expected from previous data (23000 compared to 3300). It was reextracted and upon reanalysis, gave a result comparable to the previous data. Because of the recovery of the internal standard on the high analysis (114%), the cause of the high value must be attributed to lack sample homogeniety

T-17	Soil	3/8/89 @3:30pm	2400 ppm
T-17W	Soil	3/8/89 @3:30pm	37 ppm
T-17E	Soil	3/8/89 @3:30pm	270 ppm

Approved Michael Grace Date 3/13/89 Notebook _____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Recd by HDR.
3/22/89

Report

SNOQUALMIE SOIL SAMPLES

Aroclor Analysis

Three soil samples were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Two of the samples contained a layer of water and that was analyzed also. Aroclor 1260 was detected in all the samples with the results summerized below.

T-12	Soil	3/9/89 @12:05pm	73000 ppm
T-12	Water		1310 ppm
T-12E	Soil	3/9/89 @12:05pm	10000 ppm
T-12W	Soil	3/9/89 @12:05pm	32000 ppm
T-12W	Water		770 ppm

Approved [signature] Date 3/13/89 Notebook_____

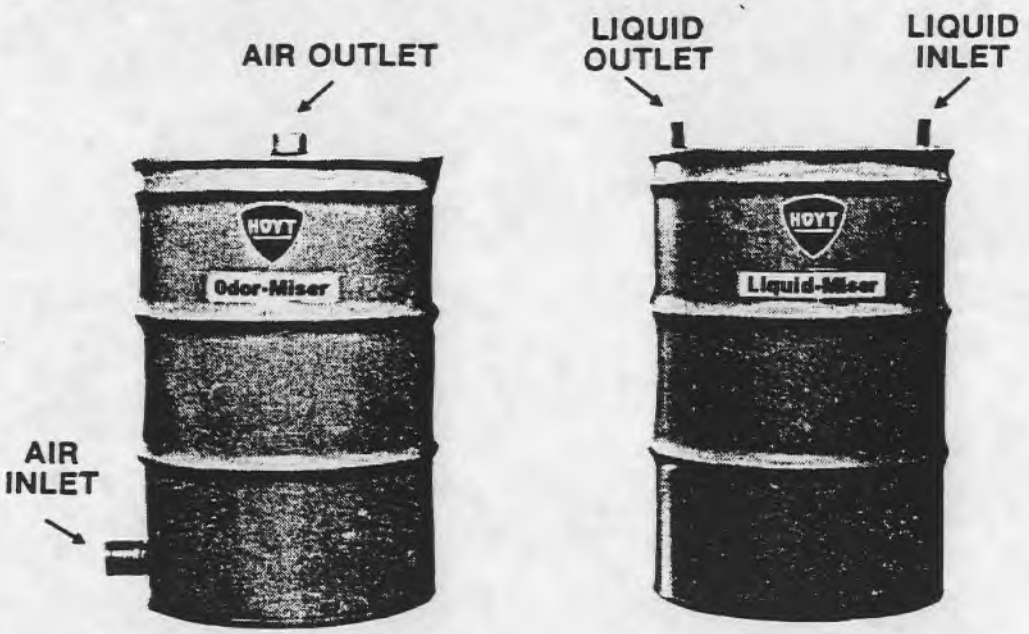
Page Number _____

APPENDIX D

SMALL-SCALE ACTIVATED CARBON TREATMENT CANISTERS: EXAMPLE PRODUCT LITERATURE

HOYT

Activated Carbon Canisters



The Hoyt Odor-Miser and Liquid-Miser are pre-engineered, low-cost, activated carbon canisters designed to provide an effective solution for purifying low flow rate air and water streams without the need for capital investment, dedicated personnel or complicated process equipment.

Hoyt Carbon Canisters are on the job 24 hours per day to clean up air emissions and water streams. Depending on flow rates, additional units can be installed in series or parallel.

The life of an Odor-Miser or Liquid-Miser will depend on the type, concentration and volume of contaminant in the air or water stream. In certain cases, these carbon canisters have been effective for up to eight months.

Some Typical Applications Include:

ODOR-MISER

- Capturing evaporated hydrocarbons and organics from storage tank vents
- Capturing odorous or toxic substances from reactor vents
- Capturing vented emissions from hood exhausts of chemical plants.
- Purifying air supplies for clean rooms

LIQUID-MISER

- Removing priority pollutants from industrial waste water
- Removal of organics from surface and ground water
- Treatment of decanter water from solvent recovery operations
- Liquid decolorization

- Determining the feasibility of installing a Hoyt solvent vapor recovery system

SPECIFICATIONS

	ODOR-MISER	LIQUID-MISER
DIMENSIONS:	36" H X 23" DIA.	36" H x 23" DIA.
FLOW RATE:	UP TO 100 CFM	UP TO 7.5 G.P.M.
CARBON:	165 LBS. OF GRANULATED ACTIVATED CARBON	165 LBS. OF GRANULATED ACTIVATED CARBON
INLET:	2" STANDARD THREAD	¾" N.P.T. NIPPLE
OUTLET:	2" STANDARD THREAD	1" STANDARD THREAD
CHARGING TIME:	NOT APPLICABLE	AT 2 G.P.M. CHARGING TIME IS 25 MINUTES
CONTACT TIME:	AT 20 C.F.M. CONTACT TIME IS 16 SECONDS	AT 2 G.P.M. CONTACT TIME IS 25 MINUTES
SHIPPING WEIGHT:	300 LBS.	250 LBS.

The Clean Air Company
In USA call toll-free 1-800-343-9411
in Massachusetts (617) 636-8811
HOYT CORPORATION
Forge Road, Westport, Mass. 02790
Hoyt Mfg. (Canada) Ltd., Montreal, Canada
Hoyt Corporation, Manchester, England

MAUL FOSTER ALONGI
1329 North State Street, Suite 301 | Bellingham, WA 98225 | 360 594 6262 | www.maulfoster.com

March 20, 2013
Project No. 0779.02.01

Mark Urdahl, Executive Director
Port of Chelan County
285 Technology Center Way, Suite 102
Wenatchee, Washington 98801

Re: Site Characterization Report, Former Cashmere Mill Site, Cashmere, Washington

Dear Mr. Urdahl:

Maul Foster & Alongi, Inc. has prepared this letter report to summarize the results of environmental site characterization activities conducted at the former Cashmere Mill Site ("the site" or "the property") located along Mill Road and Sunset Highway in Cashmere, Washington (see Figure 1). On behalf of the Port of Chelan County (the Port), previous consultants have conducted multiple rounds of subsurface investigation at the site in order to evaluate geotechnical properties of the wood waste fill (sawdust, lumber ends, bark, and wood debris), evaluate hydraulic properties in support of construction dewatering activities, and characterize the nature and extent of wood waste and petroleum-contaminated soil (PCS) in support of a removal action that will take place before redevelopment of the site.

PCS was observed at the site during geotechnical exploration and site improvement activities conducted in 2009. Subsequently, soil samples were collected and analyzed from test pits completed in 2009, 2010, 2011, and 2012 to further characterize the nature and extent of chemical impacts. This letter report provides a summary of the physical and chemical data and an evaluation of chemical impacts within the context of the Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) guidance (Washington Administrative Code 173-340). The information provided herein is intended to inform a wood waste and PCS removal action, and associated confirmation testing, that the Port will initiate under an interagency agreement with Ecology. The removal action will be conducted in order to achieve a no further action (NFA) determination from Ecology and in support of redevelopment of the site.

SITE DESCRIPTION AND HISTORY

The site background information provided in this report was largely obtained from existing reports prepared by RH2 Engineering, Inc. (RH2).

Site Description

The site is located in the City of Cashmere, along Mill Road and Sunset Highway (Figure 1). The site is approximately 32.5 acres in size, bounded to the north by the Burlington Northern

Santa Fe railroad tracks; to the east, south, and partially to the west by Brender Creek; and to the west by residential and light industrial uses. The northern boundary of the site, along the railroad tracks, is less than 100 feet from the Wenatchee River.

The site is currently vacant. There are no buildings or structures and the ground surface is unpaved. The buildings shown in the aerial photograph (see Figure 2) were demolished and removed in 2011. Five areas of PCS have been identified at the site (see Figure 2), and wood waste fill material is present throughout most of the site (see Figure 3).

The Port intends to transfer the site to a prospective purchaser (Crunch Pak of Cashmere, Washington). Crunch Pak intends to redevelop the site for commercial use as a fruit storage warehouse and fruit bin storage site. As a condition of purchase, Crunch Pak requires removal of wood waste-related materials from areas of the site that are developable, removal of soil with petroleum contamination above cleanup levels, and backfilling of the site with structural import fill to regrade the site and improve drainage.

Site History

The site was used primarily for lumber milling from the 1940s until the late 1970s and for a variety of commercial and light industrial uses thereafter (see RH2, 2007, in Attachment A). The mill produced primarily thin lumber to construct fruit packing boxes. Reportedly, no wood-treatment chemicals or processes were documented to have been used at the site. The Cedarbrook Company, owned by Mr. John Lysaker, bought the property in 1990 from WI Forest Products, and sold the property to the Port in 2007. Based on anecdotal information, the property has never been used for agriculture (Attachment A: RH2, 2007).

An accidental fire in 1990 caused some damage to mill buildings. A larger arson fire in 2000 destroyed many of the mill buildings (see RH2, 2007, in Attachment A).

Mill operations produced wood wastes that were used to fill in low-lying areas at the site. Based on characterization efforts, wood waste at the site is primarily raw wood, lumber, sawdust, and is intermixed with granular fill. Wood waste was distributed by site grading that leveled or covered wood waste stockpiles after mill activities concluded. The former mill processed raw (untreated) timber into lumber; no wood treating is known to have taken place at the site (see Forsgren Associates, Inc., 1990, in Attachment A).

Interviews with several long-time City of Cashmere residents and the Port indicate that fill was also imported to the site for several decades (see Attachment B). There are three primary areas that received fill: (1) south of Mill Road in the former log storage area, (2) the former mill pond north of Mill Road; and (3) the area north of Sunset Highway. Fill materials in these areas have been observed to consist of wood waste; silt, sand and gravel-size granular fill; and concrete and asphalt. The portion of the site located north of Sunset Highway

received fill from the City of Cashmere for a number of years. The material in this area consists primarily of silt, sand, gravel-size granular fill, and building materials, including concrete and asphalt (see Attachment A: RH2, 2007).

The Port has conducted a series of geotechnical investigations at the site since 2007 in order to characterize the nature and extent of wood waste. From 2009 to 2011, the Port also completed a series of site improvements, including the removal of asphalt-paved areas and concrete slabs and footings, primarily in the area between Mill Road and Sunset Highway. The concrete materials were crushed and stockpiled for use as fill. The asphalt pavement was sold for reuse and removed from the site. Asbestos-containing materials were removed from the two on-site buildings and then demolished. The demolition debris was reportedly disposed of off site (Attachment B).

During activities associated with the geotechnical investigations and site improvements, PCS was observed in five areas or concern at the site (see Figure 2). Focused environmental investigation work has been conducted at the site since 2009 to characterize the nature and extent of PCS in these areas. In addition, limited wood waste and soil removal actions were completed at the site in 2011 as part of a pilot wood waste interim removal action and during the reconstruction of Sunset Highway (RH2, 2013). The previous investigations and interim removal actions are discussed in the next section.

INVESTIGATIONS AND INTERIM ACTIONS

Geotechnical and environmental investigations and limited interim actions have been conducted at the site since as early as 1990. This section provides a brief summary of work completed, as well as confirmed or suspected environmental conditions identified as a result of this work. Available documentation and summaries of previous work activities and findings are provided as the following attachments to this report:

- Copies of reports summarizing previous work activities and findings, where available, are provided as Attachment A.
- The 2013 Removal Action Work Plan is included as Attachment B.
- Investigation locations are summarized in Table 1 and shown in Figure 2.
- A summary of samples collected and chemical analyses requested is included in Table 2.
- Depth to water measurements and petroleum hydrocarbon impacts observed during subsurface investigations (compiled from exploration logs) are summarized in Tables 3 and 4, respectively.

- Test pit, boring, and monitoring well completion logs are included as Attachment C.
- Laboratory analytical reports are provided as Attachment D.
- Receipts for soil that was disposed of off site as part of the interim actions are included as Attachment E.
- The 2012 Soil and Groundwater Characterization Work Plan is included as Attachment F.

Analytical data generated to date is being compiled and will be uploaded to Ecology's Environmental Information Management database in order to meet the requirements for a NFA.

1990 Phase I Environmental Assessment

In 1990, a Phase 1 environmental site assessment was performed by Forsgren and Associates, Inc., before the purchase of the property by Mr. Lysaker of the Cedarbrook Company (Forsgren, 1990, Attachment A). This assessment identified evidence of de minimis soil contamination from lubrication oils at several locations south of Mill Road, and concluded that the contamination likely existed only in shallow soil. Underground storage tanks (USTs) were observed, and a recommendation was made to remove them or upgrade them up to be compliant with the current code at that time (see Figure 2 for approximate former locations of the UST's). Asbestos (in existing building materials), electrical gear, and transformers were also identified as potential environmental conditions. No samples were collected in association with this work.

Mr. Lysaker communicated to RH2 that the items identified in the Forsgren environmental assessment were remedied before or immediately following his purchase of the property (see Attachment B). Mr. Lysaker states that, before he took ownership, WI Forest Products removed one diesel UST from the vicinity of the former mill office and one gasoline UST from the vicinity of the former truck shop (Attachment A: RH2, 2007). The volume of both of these tanks is unknown. He also states that WI Forest Products completed removal of electrical gear and transformers, from the site, before his purchase of the property and that asbestos removal was completed by WI Forest Products after he took ownership of the property. Reports documenting removal of USTs, electrical gear, and asbestos were not prepared or may have been destroyed in the 2000 mill fire.

2007 Feasibility Study

RH2 completed a feasibility study on behalf of the Port before the Port's purchase of the site. The feasibility report included a limited environmental assessment and a geologic assessment

(RH2, 2007, in Attachment A). Fourteen test pits were completed in association with the geologic assessment in order to characterize the wood waste composition and distribution (TP-1-2007 to TP-14-2007). The environmental assessment included a historical review and interviews with several community members. No evidence of petroleum-related contamination was recorded in the test pit logs and no soil or groundwater samples were collected for chemical analysis.

2008 Wood Waste Summary

In 2008, RH2 conducted a literature search and regulatory review to determine potential environmental impacts that may result from wood waste on the site and potential reuse options for excavated wood waste material. Their findings are summarized in a letter report (RH2, 2008, in Attachment A), in which they conclude that wood waste at the site may result in the following environmental impacts:

- The decomposition of wood waste may result in the production of unsafe levels of methane gas.
- If exposed, the wood waste may disperse in the air as fine particulates and present a breathing hazard.
- The decomposition of wood waste may result in the generation of leachate. Wood waste leachate may exhibit chemically reducing conditions (low dissolved oxygen [DO] and low hydrogen ion potential [pH]), which could potentially dissolve metals from the granular aquifer material, resulting in elevated metals concentrations in groundwater and/or surface water.

Additionally, petroleum hydrocarbons or wood-treating chemicals may also be present in the wood waste at the site. Wood waste samples collected in August 2012 were analyzed for petroleum hydrocarbons, metals, and chemicals potentially associated with wood-treating activities (phenols and polycyclic aromatic hydrocarbons [PAHs]), as discussed below. Water quality testing for field parameters, including pH and DO, and air quality testing have not been conducted at the site.

2009 and 2011 to 2012 Sunset Highway Improvements

On May 7, 2009, RH2 conducted a limited subsurface investigation along Sunset Highway in order to evaluate geotechnical conditions in support of the water main extension project. Petroleum impacts were observed in soil and groundwater in one test pit completed on the site (TP-2-052009); this area is identified as PCS "Area 1." No samples were collected for analytical testing; however, additional investigation work was conducted in September 2009 and August 2012 to further evaluate the extent of impacted soil.

In 2009, asphalt-paved areas and concrete slabs and footings were removed from the area between Mill Road and Sunset Highway in support of the water main extension. PCS was discovered underneath a former concrete slab in the area identified as PCS "Area 2." Follow-up investigation work was conducted in October 2009 and August 2012 to evaluate the extent of soil impacts.

In 2011 and 2012, the Port reconstructed a section of Sunset Highway and, during construction, PCS was removed from the road realignment in the vicinity of sample locations S-4-092009 and S-5-092009 (see Area 1 in Figure 2), and then disposed of off site (RH2, 2013). Samples were collected from the excavated material for characterization purposes and analyzed for metals by U.S. Environmental Protection Agency (USEPA) Methods SW846 6010 (arsenic, barium, cadmium, chromium [total], lead, selenium, and silver) and SW846 7471 (mercury); samples are associated with the "Area 1 Soil Removal Area" in Tables 1 and 2. Waste disposal tickets indicate that approximately 105 tons of PCS was removed from the site in three batches in January and April 2012 (see Attachment E); however, this quantity of material may also include PCS disposed of in association with the 2011 pilot wood waste interim removal action.

2009 Environmental Investigations

Following the discovery of petroleum impacts in soil in test pit TP-2-052009 and beneath a concrete slab formerly located between Mill Road and Sunset Highway (Areas 1 and 2, respectively), RH2 conducted follow-up environmental investigations in September and October 2009. In a 2009 letter from the Port, Ecology was notified of the discovery of PCS. The notification letter includes an attachment from RH2 detailing the discovery of PCS and a sampling and analysis plan for conducting follow-up investigation work (Attachment A: RH2, 2009).

Test pits were completed in the PCS areas in order to evaluate the extent of petroleum impacts (test pits S-1-092009 to S-8-092009 in Area 1 and TP-2-102009, TP-5-102009, and S-2-102009 to S-5-102009 in Area 2). Soil samples were collected from selected test pits, based on field observations, and analyzed for gasoline-range petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Gasoline-Range Organics (NWTPH-Gx) Method and for benzene, toluene, ethylbenzene and xylenes (BTEX) by USEPA Method 8021B, modified. One sample (from test pit S-4-092009) was also analyzed for diesel-range petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Diesel- and Heavy-Oil-Range Organics (NWTPH-Dx) Method. Analytical results and findings of this investigation work are discussed in the Investigation Results section of this report.

2010 Geotechnical Investigation

The Port contracted GeoEngineers, Inc. (GeoEngineers) in 2010 to perform a detailed geotechnical evaluation of the site in support of the Port's redevelopment plans (GeoEngineers, 2010, Attachment A). GeoEngineers drilled seven borings (B-1, B-1A, B-2, B-2A, and B-3 to B-5) and completed two borings as monitoring wells (B-1 and B-2). During the geotechnical investigation, hydrocarbon impacts were observed in boring B-1; this area is identified as PCS "Area 3." At the request of RH2, and on behalf of the Port, GeoEngineers drilled two additional borings (B-6 and B-7) and collected and analyzed soil samples for diesel-range hydrocarbons by NWTPH-Dx in order to evaluate the nature and extent of PCS in Area 3. No groundwater samples were collected from the borings or the monitoring wells. Analytical results and findings of this investigation work are discussed in the Investigation Results section of this report.

2011 Groundwater Table Investigation

In support of a wood waste removal action, RH2 performed a limited groundwater investigation in 2011 consisting of depth-to-groundwater measurements at several test pit locations (TPGW1 to TPGW12) (RH2, 2011, Attachment A). The depth to the water table ranged from 1.5 to 4.5 feet below ground surface (bgs) in the area south of Mill Road, and 2 to 5 feet bgs between Mill Road and Sunset Highway (see Table 3). RH2 produced a groundwater contour map as a result of this investigation (RH2, 2011, Attachment A).

During the investigation, petroleum impacts were observed in soil in test pit TPGW1; this area is identified as PCS "Area 4." A soil sample was collected from a second test pit completed in the same location (S-1-2011) on July 6, 2011, to be analyzed for petroleum hydrocarbons. The sample was analyzed for the presence of petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Hydrocarbon Identification (NWTPH-HCID) Method. Based on the results, the sample was also analyzed for diesel-range organics by NWTPH-Dx. Analytical results from this sample are discussed in the Investigation Results section of this report.

2011 Pilot Wood Waste Interim Removal Action

The Port completed a limited wood waste interim removal pilot project in the southeast portion of the site in 2010 and 2011 (see "Pilot Wood Waste Removal Area" in Figure 2). The Port hired a contractor to remove surficial wood waste from this portion of the site. The contractor screened the wood waste, removed the larger rocks and wood pieces, and then sold the remaining material as landscape material. Crushed concrete that was previously stockpiled on site from slab removal was used to fill the excavated area. PCS was identified in the wood waste excavation area during the interim removal action; this area is identified as PCS "Area 5." The soil was stockpiled, a composite sample was collected from the stockpile, and the soil was disposed of off site (RH2, 2013); samples are associated with the "Pilot

Wood Waste Removal Area" in Tables 1 and 2. The samples were analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID. Based on the results, one sample was also analyzed for diesel-range organics by NWTPH-Dx with silica gel cleanup. The quantity and extent of PCS removed are not known.

2012 Wood Waste, Soil, and Groundwater Investigation

RH2 performed an additional investigation in August 2012 to evaluate wood waste thickness and composition in unexplored areas, to evaluate hydraulic properties and groundwater quality, and to evaluate whether PCS remains in Area 1 surrounding the excavation limits. Work was conducted in accordance with the Wood Waste, Soil, and Groundwater Characterization Plan included as Attachment F. Wood waste samples were generally analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID (one sample was also analyzed for diesel-range petroleum hydrocarbons by NWTPH-Dx with silica gel cleanup); for chemicals potentially associated with-wood treating activities, including total metals (arsenic, chromium [total], copper, and lead) by USEPA Method 6010C; and for PAHs and phenols by USEPA Method SW8270D. Soil samples were generally analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID; for gasoline-range hydrocarbons by NWTPH-Gx; and for BTEX by USEPA Method 8021B modified. Selected samples were also analyzed for extractable and volatile petroleum hydrocarbons (EPH and VPH) by methods NWTPH-EPH and NWTPH-VPH, respectively. Analytical results from this investigation are discussed in the Investigation Results section of this report.

A dewatering test well was constructed to evaluate groundwater conditions, including aquifer characteristics, and dewatering requirements in support of the planned wood waste removal action (RH2, 2012, Attachment A). A groundwater sample was also collected from the dewatering well and analyzed for gasoline- and diesel-range petroleum hydrocarbons by NWTPH-Gx and NWTPH-Dx, respectively; for chemicals potentially associated with wood-treating activities, including metals (arsenic, chromium [total], copper, and lead) by USEPA Method 6010C; and for PAHs and phenols by USEPA Method SW8270D. Aquifer test results are discussed in the Geology and Hydrogeology section of this report; analytical results from the 2012 investigation are discussed in the Investigation Results section.

PHYSICAL SETTING

The physical characterization of the site, as described in this section, presents a compilation of information obtained from the multiple investigations discussed in the previous section. The following discussion was largely obtained from existing RH2 reports.

Hydrology

The site is mostly bounded by water features, including the Wenatchee River to the north, and Brender Creek to the west, south, and east. Brender Creek flowed directly to the Wenatchee River before construction of the railroad, but today flows in a long, curving channel about 100 feet north of the southern property line. Brender Creek's year-round flow around the site has raised the local groundwater table and created hydrologic conditions favorable for establishing wetlands. Brender Creek drains about 8 square miles and discharges to Mission Creek about 150 feet from the northeast corner of the property. Mission Creek lies east of the site, drains about 79 square miles, and discharges into the Wenatchee River approximately 800 feet east-northeast of the site.

An irrigation return ditch flows about 1,000 feet from west to east along the southern shoulder of Mill Road. The ditch is open near the western boundary of the site, where it forms a small pond. From there, the water flows in a culvert for approximately 600 feet. The ditch is open for about 180 feet along Mill Road near the former Cedarbrook shop. Near the eastern boundary of the property, water enters a culvert that crosses Mill Road and flows approximately 500 feet to discharge into Brender Creek. The ditch is open for about 6 feet before reentering a culvert beneath Sunset Highway.

In the mid-1990s, the property owner undertook a conservation effort in cooperation with the Washington Department of Fish and Wildlife and Chelan County Conservation District to enhance aquatic habitat in over 2,000 feet of Brender Creek. This effort required excavation of sediment in the stream channel, resulting in a large berm that parallels the creek. The berm is approximately 10 feet high, 60 feet wide, and 1,000 feet long.

Geology and Hydrogeology

The site is underlain by unconsolidated Quaternary glacial and alluvial sediments and sedimentary bedrock of the Chumstick Formation (Tabor et al., 1987). The site is located in a bend in the former channel of the Wenatchee River. The river bend was cut into a glacial outwash terrace, forming a cut bank approximately 20 feet high south of Brender Creek. Alluvium was deposited as the river channel incised the surrounding terraces. Brender Creek flows along the base of the river cut bank. Much of the site was formerly occupied by ponds and bogs along the river floodplain. These topographic depressions were filled at various times with wood debris from mill activities and other fill materials imported to the site. The three primary areas that received fill include the area north of Sunset Highway, the former mill pond area north of Mill Road, and the former log storage area south of Mill Road. In most places, fill was placed directly on top of Wenatchee River alluvium.

Fill material includes wood waste; granular fill (sand, silt, and gravel with organic material, including logs); and inert fill (concrete, asphalt, metal, lumber, and other building materials).

Most of the fill observed during fieldwork consists of slightly decomposed wood waste or granular fill containing wood waste.

The depth to groundwater observed in test pits and one monitoring well at the site ranged from 2 to 13 feet bgs (Table 4). According to RH2, groundwater elevations observed in May and June 2011 and August 2012 show a decreasing water table gradient from the southwest toward the northeast portion of the site (see Figure 4 and RH2's 2011 Groundwater Table Investigation Memorandum included in Attachment A). The observed water table gradient indicates that shallow groundwater at the site likely flows toward, and likely discharges to, the Wenatchee River to the northwest of the site. The groundwater table likely fluctuates seasonally in response to precipitation patterns and flow variations in Brender Creek and the Wenatchee River (GeoEngineers, 2010, Attachment A).

An aquifer transmissivity of 32,000 gallons per foot per day was estimated based on the results of the pumping and recovery test conducted in the dewatering well (location DW01 in Figure 2) in 2012.

INVESTIGATION RESULTS

This section provides a summary of the soil, wood waste, and groundwater chemical data collected during investigation activities conducted from 2009 to 2012. Petroleum hydrocarbon impacts observed during subsurface investigations (compiled from exploration logs) are summarized in Table 4. Soil and wood waste analytical results are summarized in Table 5. Groundwater analytical results are summarized in Table 6. Chemical concentrations in soil exceeding applicable cleanup levels are presented in Figure 5.

The analytical data were screened relative to MTCA cleanup levels in order to evaluate the potential for human health risks. Analytical results were compared to MTCA Method A, unrestricted land use, table values. The lower of the carcinogenic and non-carcinogenic MTCA Method B, standard formula values were used for chemicals with no available Method A cleanup level.

Soil and Wood Waste

Hydrocarbon impacts were observed in soil and wood waste in multiple locations of the site during subsurface investigation activities (see Table 4). Hydrocarbon impacts (e.g., odor, sheen) were observed in soil in the PCS areas during exploration activities and during the pilot wood waste interim removal action and water main extension activities. In addition to the five known PCS areas, hydrocarbon impacts were observed in soil and wood waste in test pit locations completed in August 2012 (see Table 4). Soil samples were collected and analyzed for petroleum hydrocarbons from the PCS areas and the August 2012 test pits with observed impacts, with the exception of test pits TP-13-2012, TP-16-2012, and TP-17-2012.

According to Ecology guidance, in the absence of hydrocarbon identification data (by NWTPH-HCID), the diesel- and motor-oil/heavy-oil-range hydrocarbon fractions should be summed for comparison with the MTCA Method A cleanup level (Ecology, 2004). In accordance with this guidance, the diesel- and motor-oil/heavy-oil-range hydrocarbon concentrations detected in samples that were not also analyzed for NWTPH-HCID were summed for comparison to the heavy oils cleanup level. Heavy-oil-range hydrocarbons were analyzed in soil samples from Areas 1 to 5, in stockpiled soil excavated from the Pilot Wood Waste Removal Area (Area 5), and in one wood waste sample (TP-24-2012). Heavy oils were detected in the wood waste sample and in the samples from Areas 2 to 5. Heavy oils concentrations above the MTCA Method A cleanup level were detected in Areas 2 and 3. Other chemical detections in soil and wood waste were below cleanup levels.

Gasoline-range petroleum hydrocarbons were analyzed in soil samples collected from Areas 1 and 2, but detected only in Area 1. Gasoline-range hydrocarbon concentrations in Area 1 soil exceeded the MTCA Method A cleanup level (see Figure 5).

Soil samples from Areas 1 and 2 were analyzed for BTEX. Ethylbenzene, toluene, and xylenes were detected in soil from Area 1. Concentrations were below applicable MTCA Method A cleanup levels.

Metals (arsenic chromium, copper, and lead) and PAHs and phenols (4-methylphenol and pentachlorophenol) were detected in wood waste samples collected from multiple locations at the site, but concentrations were below MTCA Method A cleanup levels. Metals were also analyzed in a sample collected from the stockpiled soil excavated from the Area 1 Soil Removal Area (Area 1) for disposal characterization. Concentrations were below MTCA Method A cleanup levels.

Groundwater

Petroleum impacts have been observed in groundwater at the site. A sheen on groundwater was observed in three subsurface explorations: test pit TP-2-052009 (Area 1), boring B-1 (Area 2), and boring B-6 (Area 2) (see Table 4); however, groundwater samples were not collected from these locations. Three wells have been completed at the site (monitoring wells B-1 and B-2 and dewatering well DW01); a groundwater sample was collected from the dewatering well only. According to RH2, the monitoring well at boring location B-2 was damaged or is not locatable. The condition of the monitoring wells is not known. It is likely the wells will be removed as part of a site removal action.

Petroleum hydrocarbons, BTEX, PAHs, and phenols were not detected in the groundwater sample from the dewatering well. Arsenic, copper, and lead were detected, but were below their respective MTCA Method A cleanup levels.

The dewatering well is screened in the native material below the fill and is presumed to be hydraulically upgradient of the known PCS areas. Additionally, the well was installed in the pilot wood waste interim removal area. Therefore, groundwater from this well likely is not representative of groundwater conditions affected by PCS or wood waste.

Summary

Groundwater quality in the vicinity of the dewatering well does not appear to be impacted by site-related sources. However, this sample likely is not representative of groundwater conditions affected by sources at the site. Chemical impacts due to site-related sources may be present in groundwater.

Chemical concentrations in wood waste were below applicable cleanup levels; however, these chemicals, where detected in wood waste and wood waste samples, were collected from limited areas of the site. Chemical concentrations may potentially be present in wood waste in areas of the site not sampled.

Heavy oils exceedances were observed in soil in Areas 2 to 3; however, the extent of soil with chemical exceedances is not well-delineated. Surrounding test locations either were not sampled, or the samples were not analyzed for diesel-range hydrocarbons. Gasoline-range hydrocarbon exceedances were detected in Area 1; however, gasoline-impacted soil was removed during the reconstruction of Sunset Highway and chemical concentrations in samples collected from test pits surrounding the excavation extent were below cleanup levels.

REMOVAL ACTION

In order to prepare the site for redevelopment and to obtain an NFA determination from Ecology, a wood waste and PCS removal action, followed by confirmational groundwater monitoring, will be conducted at the site. The details of the proposed action are outlined in the Removal Action Work Plan (Attachment B). The extent of wood waste that will be removed is shown in Figure 3. PCS will be removed concurrent with the wood waste removal.

Although chemical impacts to wood waste and soil at the site have not been fully delineated, the planned removal action is designed to identify and remove material with chemical concentrations above screening levels. Groundwater will be monitored for a period of time following the removal action.

Wood waste will be excavated to the underlying native alluvium in developable areas of the site (see Figure 3). Once exposed, the native alluvium will be field screened for petroleum impacts, and confirmation samples will be collected in a grid pattern and analyzed for petroleum hydrocarbons and wood-treating chemicals. Areas of the excavations exhibiting

MTCA Method A cleanup level exceedances, based on the grid sampling results, will be overexcavated until the remaining material meets cleanup levels.

Areas with confirmed petroleum hydrocarbon concentrations above MTCA Method A cleanup levels will be excavated. Additional areas where PCS is suspected, based on field observations made during the wood waste removal, will also be excavated. The excavation extents will be determined based on field screening and confirmation sampling. Areas of the excavations exhibiting MTCA Method A cleanup level exceedances, based on the confirmation sampling results, will be overexcavated until the remaining soil meets cleanup levels or to the extent practical given site conditions and dewatering activities.

A groundwater monitoring well network will be installed following the removal action. The network will be designed to monitor groundwater flow directions and groundwater. The objective of the groundwater monitoring is to confirm that chemical concentrations in groundwater (if any) are below applicable cleanup levels. Groundwater monitoring results will be used to inform ongoing monitoring and/or groundwater remedial actions that may be required in order to meet cleanup levels.

SUMMARY AND CONCLUSIONS

Petroleum hydrocarbons are present in soil in Areas 2 and 3 of site at concentrations above applicable cleanup levels. Chemical concentrations in wood waste were below applicable MTCA cleanup levels and were not detected in a groundwater sample collected from the dewatering well. However, the groundwater sample collected from the dewatering well is not considered representative of groundwater conditions and heavy oils exceedances in soil are not well-delineated.

The removal action is intended to remove wood waste and known PCS and identify and remove additional contaminated material above applicable cleanup levels. The proposed groundwater monitoring activities will provide additional characterization of groundwater contamination. The results of the soil confirmation and groundwater sampling that will be conducted as part of the removal action will provide the additional information needed by Ecology to make an NFA determination.

Sincerely,

Maul Foster & Alongi, Inc.

Heather Hirsch, LHG
Project Hydrogeologist

Justin Clary, PE
Principal Engineer

Attachments: Limitations
References
Tables
Figures
A—Previous Investigation Reports
B— Removal Action Work Plan
C—Test Pit, Boring, and Well Installation Logs
D—Laboratory Analytical Results
E—Soil Disposal Tickets
F—Soil and Groundwater Characterization Work Plan

cc: Mary Monahan, Washington State Department of Ecology

LIMITATIONS

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Jason Rogers

From: Scot Urquhart <scoturq@gmail.com>
Sent: Wednesday, March 30, 2022 8:29 AM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan.

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

After many hours of reading the staff report, exhibits, and the SCAN appeal, I find myself shocked and embarrassed that the city of Snoqualmie has let the proposed development proceed this far. I am compelled to voice my opposition and agree with everything as stated in the appeal. As a resident in the downtown area for over 7 years I have seen first hand how bad the traffic, noise, environment, flooding, etc is getting. A few thing we have experienced in just the last 5 years alone as a result of over development and lax governance include:

1) Increased flooding and erosion in Coal Creek and Kimball Creek.
2) Property damage from wildlife coming into town and loss of area for wildlife.
3) Terrible traffic. Nearly impossible to get onto Railroad ave during school start and finish hours. Traffic backs up past Tokul roundabout on most sunny weekends to the point Police are called.
4) Flooding along the mill pond and site development area which closes down area roads and access points

It is not necessary to include my thoughts on the contaminants and lack of adequate plans to clean up the site before any approvals for development starts as the department of ecology statements along with other supporting reports should be self-evident.

While I am not opposed to development and growth, this proposal as it currently sits is a disaster waiting to happen that will surely ruin the community that we chose to live in and support.

James Scot Urquhart

Jason Rogers

From: thyrad@urquharts.net
Sent: Wednesday, March 30, 2022 11:27 AM
To: Gwyn Berry
Subject: Snoqualmie Mille Site Planned Commercial/Industrial (PCI) Plan
Attachments: March 29 2022 Mill Pond.docx

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Ms. Berry

Attached please find my letter for the public comment regarding the Mill Site Plan Application Public Hearing.

Thank you,
Thyra Demetrick

March 29, 2022

Dear City Council Members,

My family moved to Snoqualmie from Spokane eight years ago. A huge reason that we moved here was because we are outdoor enthusiasts and love the rural setting and small town feel that Snoqualmie offers. My husband, three children and I have enjoyed exploring the local area and setting deep roots, as raise our three children here in the valley. A favorite recreational activity of ours has been to kayak and canoe in the Mill Pond. It is such a tranquil, unpopulated little piece of nature right at the edge of town. Truly a unique treasure to have this pocket of nature undisturbed, and it feels like it blends right in to the environment of having the Snoqualmie Falls nestled amidst nature as well. It is deeply disturbing to me to see that thoughts of developing the Mill Pond/Tokul area have progressed to this stage of consideration.

This development is not in line with the pristine rural feel of this part of Snoqualmie. People move here and treasure living here precisely because Snoqualmie is very different from nearby developed towns like Issaquah. There are MANY grave environmental concerns that have not been addressed nor a plan outlined to rectify the ones that the developers acknowledge. I believe that a development of this proposed scale will be extremely detrimental to this area. It will add traffic to an area that is already extremely busy– turning left from the neighborhoods along Railroad Avenue during peak times is a long and sometimes dangerous process and the round-about backs up past the Parkway light in the summer with visitors to the Falls. The area is accessed by a road that closes when the river floods. The noise, light pollution, and carbon footprint will detrimentally change the look and feel of this part of Snoqualmie. People have a plethora of shopping choices already, both in Snoqualmie, North Bend, and Issaquah plus further along there is Bellevue and even Seattle if they want the kinds of places that the development is looking at bringing in. I do not believe that the convenience of having them in Snoqualmie is worth the negative effects, both environmentally and aesthetically, and I do not believe that the Snoqualmie citizens want it. Save this town for the residents, not the developers that want to make money from it, but not live here to suffer the consequences. I implore you to preserve the natural area surrounding historic Snoqualmie leave the Mill Site as is, so people may enjoy the natural wilderness feeling that this area offers.

Please vote against the proposed development and stay loyal to preserving Snoqualmie's rich history of the mill site, the pristine wilderness setting and quaint small-town community feeling, as you have done admirably in the past.

Thank you for your devoted service to the City of Snoqualmie, I appreciate you all.

Thyra Demetrick

37927 SE 92nd Pl
Snoqualmie, WA
98065

Jason Rogers

From: Karen Yoshitomi <kareny@jcccw.org>
Sent: Wednesday, March 30, 2022 12:20 PM
To: Gwyn Berry
Cc: Karen Yoshitomi
Subject: Snoqualmie Mill Planned Commercial/Industrial Plan Application
Attachments: Snoqualmie Mills EIS Testimony (CONNIE SO).pdf

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For transmittal to the Hearing Examiner.

Please accept this transmittal on behalf of **Connie So, PhD Teaching Professor American Ethnic Studies University of Washington (Seattle)**. She would like to submit her written testimony for consideration by the Hearing Examiner.

Thank you.

Sincerely,
--
Karen Yoshitomi
Executive Director
Japanese Cultural & Community Center of Washington
1414 South Weller Street | Seattle, WA 98144
t 206.568.7114 ext. 107 | **e** KarenY@jcccw.org
jcccw.org | Facebook | Twitter

UNIVERSITY OF WASHINGTON

DEPARTMENT OF AMERICAN ETHNIC STUDIES

March 26, 2022

Snoqualmie City Council
Snoqualmie, WA

Dear Snoqualmie City Councilmembers,

I am writing as a Teaching Professor at the University of Washington's American Ethnic Studies department in Seattle, as the President of OCA Asian Pacific Advocates of Greater Seattle, and a resident of King County for 54 years. In all capacities, I would be extremely disappointed if the City of Snoqualmie did not recognize the significance of the artifacts relating to the forced removal of the Japanese American saw mill employees and their families in 1942, and support efforts to retrieve and preserve the artifacts.

The development of the City of Snoqualmie and the entire Snoqualmie ridge owes much to the early Japanese American community. Despite facing racial hostilities, the Japanese were recruited to work in the saw mills and for the railroad in the region. Unfortunately, in 1942, almost exactly 80 years ago, Japanese American employees and their families were forced to leave *en masse* and taken to American concentration camps. The forcefully uprooted Japanese Americans were only allowed to take what they could carry. Therefore, many of the personal items were tossed into the pit toilets of the bunkhouses. Overnight, Japanese Americans were gone and the bunkhouses destroyed by fire.

As I understand it, though the cultural significance of the "Japanese community site" is not disputed, the archeological professional who performed the site survey concluded: "That the systematic data recovery from the site is not feasible and further survey to delineate the resource would be likely to adversely affect the site." The degree of difficulty or disturbance to the site should not be used as an excuse or to create a roadblock for the recovery of the artifacts. These were items that they could not take with them and did not want to have scavenged by human predators. Unfortunately, the "company" burned down the barracks and covered it over with logs, boulders and fill that is now between 9 and 16 feet thick.

In other words, while the archeological consultants for Snoqualmie Mill Ventures, LLC indicate that they understand the cultural and anthropological importance of recovering artifacts, they would not recommend excavation due to the cost. An unwillingness to support efforts to recover the artifacts would indicate a callous disregard for the significance and circumstances under which the people painfully parted with their belongings and home.

The City of Snoqualmie has a civic duty to preserve and share this vital history in their jurisdiction. The forceful removal of Japanese Americans happened in their jurisdiction and to

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aes@u.washington.edu

permit this history to disappear would be equivalent to destroying evidence of the event on one hand, making them complicit after the fact, but also destroying the dignity of the individuals this happened to, as well as the opportunity to prevent this type of thing from happening again. If cost is a factor, they – not the Japanese American community – should be seeking support from other sources, the state and federal governments, for instance, for the project.

Government exists to undertake these important responsibilities. Failure to support the recovery of the artifacts while knowing the tragic history, would be an injustice to those whose human and civil rights were violated in 1942. A lack of apathy in the current context, could be seen as an indication of indifference to the social justice issue we are faced with today. Simply put, your support of a full archeological excavation of the site would help to shed light on a historically significant episode of the past that has been buried.

Sincerely,

Connie So, PhD
Teaching Professor
American Ethnic Studies
University of Washington (Seattle)

President
OCA Asian Pacific Advocates of Greater Seattle

Jason Rogers

From: Hollan Read <hollanleeread@gmail.com>
Sent: Wednesday, March 30, 2022 1:09 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan

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Dear Council,

I know the city relies on the apathy and ignorance of its citizens. No one cares enough about this kind of thing until it happens, and once it starts happening, everyone is going be outraged. It's always the same story. I grew up here, and in my 46 years, I've been watching as piece by piece of this area gets ripped away. It's just progress and not easily stopped.

That being said, I strongly oppose the proposed Mill Site development plan. It would create too much traffic congestion both for the infrastructure of the Ridge and for downtown, add to environmental problems and have unlooked for effects on wildlife. Our schools are already overcrowded. Our communities are already bursting. We don't need more people. We don't need another office park. We do not need another shopping center.

The natural beauty of this area is the reason many people live here. Destroying that by building apartments, houses, retail, and offices makes Snoqualmie more like a sprawling congested suburb and less like a rural, richly historic "small town". Keep developing this area and you'll create a soulless place.

Since members of the city government and council live here, too, its puzzling that you would want to contribute to the desecration of your home. Obviously, the money is the reason. I am fully aware that some people see "opportunity" and "growth" while others just see the problems that would arise from further development. For me, those problems outweigh the benefits.

Please consider your citizen's opposition to this project.

Best,
Hollan Read

Jason Rogers

From: Carson M <carsonlmaestas@gmail.com>
Sent: Wednesday, March 30, 2022 1:52 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan.

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The Snoqualmie Mill Site development plan was drafted in 2017. At the time that it was drafted and submitted we had a different mayor, a different city council, and a completely different constituency base.
In the small neighborhood that I live in (North/South) between River and Newton, and 384th and Doone there are 54 houses and 2 apartment complexes. In the last 5 years there have been approximately 25-27 Escrow listings that have sold for this neighborhood. I believe the trend for our neighborhood is in line with the rest of Snoqualmie which would indicate that in the last 5 years about half of the houses have been sold and therefore half of our population has been here less than 5 years (myself included).

I (along with many of my neighbors), are vehemently against the development of the Mill Pond Site for a myriad of reasons. Discussions on the future of the Mill Pond Site are happening on Nextdoor, Facebook, and Twitter, and the overwhelming sentiment in these discussions is that the citizens either do not want the site to be developed EVER, or that there are serious concerns about the contractor Snoqualmie Mill Ventures (SMV) and the City of Snoqualmie to effectively clean up the contaminated grounds prior to cleaning up.
In 2021 a lawsuit was brought against SMV, and US Senior District Judge Marsha J. Pechman determined that SMV violated the Clean Water Act through unpermitted discharges of industrial stormwater into the navigable waters of the United States (Snoqualmie River).
On the Department of Ecology's Water Quality Permitting and Reporting System any citizen can search for a record of violations that have occured at the Mill Site under permit "WAR303314". There are 56 violations between 2016 and 2020.

Combined this with the City's track record of failing to enforce municipal code at the expense of its citizens including:
-failing to notify citizens living within 500 feet of a proposed hotel in 2017 yet construction commenced anyway
-the lack of enforcement of Snoqualmie municipal code chapter 10.28 which establishes that Snoqualmie Parkway is not approved trucking route, yet continues to remain a primary route for all logging activities
-the retaliatory ethics investigation into an elected official, who's whistleblower complaint raised concerns about the development of the Mill Site.

In addition to the citizen concerns, Department of Ecology violations, lack of proper and ethical oversight by the City, the Snoqualmie Tribe has also raised their concerns about the development of the Mill Site. I won't speak on their behalf, they released a statement on July 9, 2020. Rather than including the entire text of this statement I will provide the conclusion.
"The Tribe appreciates the City’s consideration of the foregoing comments regarding the Project. Further analysis is required before issuance of a Final EIS or the City should exercise its substantive authority under SEPA and deny permits and authorizations required for the Project to move forward. The Tribe welcomes government-to-government consultation that may facilitate resolution of the Tribe’s concerns regarding the Project."

See page 3 of the statement to see their comments relating to the concerns about development occurring on their archaeological sites, including burial sites. While I may not be as religious or superstitious as many in this community... I don't think it's a good idea to be developing on top of what might be a Native burial ground.

To sum up my concerns... I do not support the development plans of the Mill Pond Site, and I believe that most of the citizens in the City of Snoqualmie do not either. Most importantly, I don't think that our City Council or Mayor even care that we don't support it.

Developing the Mill Site with a contractor that has a track record of environmental violations, to be overseen by a municipal government that does not adhere to its own laws, at the expense of its citizens and the communities downstream is one of the worst things our city council can do at this time. Vote No.

-Carson Maestas

Jason Rogers

From: Nathan Kryger <natex@yahoo.com>
Sent: Wednesday, March 30, 2022 2:35 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan

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

Hi Gwyn,

I am writing to express my opposition to the planned development of the Snoqualmie Mill Site. I think development of the site is an extremely bad idea considering the environmental risks including, but not limited to, the quantities and types of toxins present in the soil on-site. I do not believe that site remediation is sufficient and that disturbing the soil at all is inherently risky. I also do not believe that the existing road infrastructure including the SR-18/I-90 intersection, Snoqualmie Parkway, and Railroad Avenue have sufficient capacity to handle the additional traffic that developing the mill site will create.

Sincerely,
Nathan Kryger

Jason Rogers

From: Jeff Groshell <radargolf@hotmail.com>
Sent: Wednesday, March 30, 2022 2:42 PM
To: Gwyn Berry; Jeff Groshell; Lacy Linney
Subject: Mill Site Development

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

Dear Gwyn Berry,

Please consider stopping the perpetual destruction of the lower Snoqualmie Valley. This site has been considered as an area to serve as a spill way and water retention area to decrease flood levels for Snoqualmie, Fall City, Carnation, and all the property below the falls. To see this site instead become yet another contributor to the increase in flood volumes, flow rates, and of course property damage is exceptionally sad and disappointing.

As a lifelong valley resident, I have seen first-hand how the mismanagement of the Snoqualmie Valley has led to massive increases in lower valley flooding. My grandparents owned and operated the Valley Record from 1949 to 1961 and I know how the prevention of flooding in North Bend and Snoqualmie has increased flooding in the lower valley. It started with levees on the middle fork to prevent flooding in North Bend. Then years later came the 205 project to decrease flooding in Snoqualmie. Shortly after that came the PSE project to decrease flooding in Snoqualmie even more. All this time the upper valley was growing with projects like this one each adding more water to the river system to make an even greater increase to the flooding problems for the people downstream.

As the largest example of unfair development practices, that really hurt the lower valley through increased flooding, I will discuss Snoqualmie Ridge. This project saw a massive increase in impervious surfaces, leading to an increase in flooding. It also saw numerous retention ponds that were poorly designed as simple overflow ponds. This meant they only held water until they were full and then the rest of the wet season they quickly overflow and do almost nothing to stop the flooding increase caused by the development. I know all of this through conversations with King County Flood Control (Tom Bean).

Common sense tells anyone that you can't replace open land and forests with roads and homes without creating more run off. Common sense also says you can't prevent flooding up stream without pushing the problem downstream and making their problem worse. Unfortunately, there either is no common sense or there is unfair and corrupt practices allowing the destruction of the lower valley through increased flooding. The second option seems to be the case more often than not as evidenced by false claims of downstream impact studies that were never actually done before projects like the 205 and PSE.

What does this all mean? For our property at Snoqualmie Falls Golf Course it means we have seen floods that were so high that we got water in our clubhouse. This clubhouse was built in about 1960 at a height 3 feet over the 100 year flood line. The 2006 flood was 3 inches deep in our building and the 2009 flood was 1 foot deep in our building. Those two floods combined, cost us aproximately 1 million dollars in repairs and lost revenue. It has meant the destruction of highway 202 near Fall City twice, as well as the destruction of the properties across 202 in that area. It led to the loss of farms below the falls, the county buy out and closure of the campground, the loss of other homes and businesses in the lower valley, and costly damages to everyone else like ourselves that barely survived. It means we are on the cusp of having

a flood that actually floods the residents and businesses in Fall City proper. This is an area that has never flooded and therefor lacks flood insurance or protection. I believe at this point that a 50 year flood would probably get into the towns of Fall City and Carnation destroying families homes and businesses without protection of flood insurance that they don't realize they now need thanks to the unfair upstream practices. I also have no doubt that a 100 year event would accomplish this destruction.

Please have some common sense and compassion. This site could serve to fix some of the damage already done by prior unfair projects designed to advance the upper valley's growth at the expense of those of us living in the lower valley. **OR** - You could let it move forward and continue the destruction of what is left of us trying to live our lives, run our businesses, and raise our families in the lower valley. Please do the fair and right thing!

Sincerely,

Jeff Groshell
Snoqualmie Falls Golf Course

Snoqualmie Community Action Network (SCAN)
snoqualmieaction@gmail.com

March 30, 2022

City of Snoqualmie
Office of the Hearing Examiner
MS Sharon A Rice
C/o Gwyn Berry

Transmitted electronically to gberry@snoqualmiewa.gov

RE: Snoqualmie Mill Planned Commercial/Industrial Plan
PCI 17-0001

We would like to submit our comments on the above referenced project application.

Our submittal consists of four documents.

The first is the City's Staff Report, Staff Recommendations Section J, Conditions of Approval, marked up with our suggested amendments to the conditions of approval. These comments are shown in red.

The second document is the rest of the City's Staff Report, marked up with our comments.

The third document is the Updated PCI Application Submittal marked up with our comments in red.

The fourth document is a memorandum to the City Councilmembers. This document discusses amendment procedures and offers several amendments. We wish it to be part of the record. It is intended to inform the Hearing Examiner as well as the Councilmembers.

Due to the size of these documents, we have placed them in a cloud storage folder at https://drive.google.com/drive/folders/1MpgTwl5OOqiYfmCxOvtg1UVEbs9itRSS?usp=sharing Please contact us at SnoqualmieAction@gmail.com if you have any difficulty downloading these four documents. We request that all four of our documents be included in the record and provided to the Councilmembers.

The documents that we marked up were made available for the first time to the public on March 22 and 23. These documents are voluminous, technical, and detailed. You should know that it was a tremendous effort for our volunteer grass roots group to analyze all of the information and provide what we believe to be professional quality detailed analysis and recommendations. Where we made technical comments, most of them were reviewed by an expert in the field.

We did our best with the time that we were afforded, but our work was not completed. We have additional, significant, pertinent and informative comments that we wish we could provide to you and have on the record. We think that the public interest would be best served by keeping the Plan Hearing record open for written comments until the close of the FEIS Hearing. We understand that these two hearings are actually one open record hearing as required by State law.

The most expeditious way that we could communicate our vast number of detailed and technical comments was to mark up the source documents directly. We believed that this format would best accommodate your need for efficiently documented comments. We hope that you will find our comments helpful as you do your research and arrive at your conclusions.

We did our best to create a readable and editable format by converting the City's PDF documents to WORD. We selected font styles and sizes that would make for the easiest reading. We hope that you will forgive the minor formatting issues that seem to be inevitable when one tries to convert and mark- up documents. We did our best to make sure that the item numbers matched up, for example, and that the text was positioned correctly. It was not easy, and our work product is not perfect.

We decided to prioritize substance over "pretty", and our comments <u>are</u> substantive and well researched. The City staff report responded to the Applicant's updated application, so it is obvious that the updated application had been in existence for some time. We believe that since we had an active appeal to the FEIS and a hearing scheduled, that we would have been given that document at the same time that the City received it.

It does not seem reasonable to us that an updated application could be submitted virtually on the eve of the first hearing without some serious consideration of rescheduling. It is for this reason that our attorney has formally requested that the Plan Hearing remain open for written comments until after the FEIS hearing is concluded. We sincerely hope that you will grant this request.

These comments are submitted by SCAN, a registered 501(c)(3) non-profit, but are also submitted individually by the following named individuals:

1. Lacy Linney – SCAN President
2. Anna Boranian – SCAN Vice President
3. Cristie Coffing – SCAN Treasurer

4. Richard Scheel
5. Mary (Peggy) Shepard
6. Wayne Russell
7. Kenya Dillon
8. Auryel Van Gemert

Thank you considering our comments, and best wishes to you as you work to support the Public Interest.

Sincerely,
Cristie Coffing
SCAN Treasurer
On behalf of the SCAN Board of Directors

This Document was converted from a PDF to WORD and then it was marked up by Snoqualmie Community Action Network (SCAN) with SCAN's comments on this Staff Report. This document is submitted for the record in the Plan Hearing for the Snoqualmie Mill Planned Commercial/Industrial Plan Application on March 30, 2022

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 apply: ~~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.

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~~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 submit ~~develop~~ a set of design guidelines to the City for approval prior to application for any implementing ~~building~~ permit. Recognizing that the design guidelines may be developed for each Planning Area in phases, no development shall ~~should~~ occur in areas where design guidelines have not been approved. ~~completed.~~

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~~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 in compliance with ~~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

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~~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.

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~~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.

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~~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 be sufficient to provide an effective visual barrier a minimum of 7 feet above grade. Planting areas shall be designed to accommodate drip line requirements for mature conifers and deciduous trees. ~~include a minimum 10-foot wide evergreen planting area with screen planting to a minimum of 7~~

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~~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.

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11. Prior to the acceptance of any Implementing Permit application, the Applicant shall submit a Wetland Protection and Monitoring Plan for the Project Site including all three Planning Areas. The Plan shall be Peer Reviewed by a consultant hired by the City at the Applicant's expense. The Plan shall apply Best Available Science and ensure that all functions and values of wetlands are preserved or enhanced. ~~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.~~

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~~11.~~

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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 included in all Implementing Permit applications: ~~addressed in the future development planning and permitting process, including civil engineering plan review and issuance of building and clear and grade permits:~~ All geotechnical design submittals shall be peer reviewed by a consultant hired by the City at the Applicant's expense.

    - 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. All submittals shall be peer reviewed by a consultant hired by the City at the Applicant's expense.
    - Schedule or phase construction activity as much as possible to reduce the amount of earthwork activity that is performed during the winter months. The Snoqualmie Surface Water Design Manual Addendum requires compliance with King County Code Section 16.82 Seasonal Limits on Clearing and Grading.
    - 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 ensure that

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sediment will not be transported into these features. ~~reduce the risk of sediment transport into these features.~~

- Prepare an emergency contingency plan and pre-position all necessary equipment to handle unexpected stormwater, landslides or accidents.
- 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 that may affect ~~on~~ areas identified in the EIS or subsequent surveys as steep slopes. Any development activity that may affect steep sopes shall require a report by a licensed engineer and shall be peer reviewed by a consultant hired by the City at the Applicant's expense.

    - 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. All slopes that may be subject to earthquake induced landslides shall be evaluated for slope stability by a licensed engineer prior to the submittal of an Implementing Permit application. This evaluation along with all proposed development conditions shall be Peer Reviewed by a consultant hired by the City at the expense of the Applicant. ~~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.~~ In addition to this requirement, the following conditions for certain areas are adopted:

    - **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:~~ Prior to the acceptance of any Implementing Permit application, the Applicant shall submit a plan to reduce air

quality impacts. This Plan shall be Peer reviewed by a consultant hired by the City at the Applicant's expense. The Plan shall designate a Responsible Person with the authority to enforce all mitigation measures. The Plan shall make special provisions to monitor any airborne release of toxic materials and shall include the following mitigation measures:

- 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.

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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. Authorized 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:

- Prior to the Acceptance of an Implementing Permit for Phase 1, ~~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. The analysis shall be Peer reviewed by a consultant hired by the City at the Applicant's expense.
- Implement compensatory mitigation measures for impacts on wildlife habitat, including the enhancement of existing wetland buffer vegetation within Planning Areas 2 and 3 with such measures as ~~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 the acceptance of an Implementing Project permit application for any project that may encounter contamination, the Applicant shall prepare a Contamination Identification and Remediation Plan in coordination with the Department of Ecology and other relevant agencies. The Plan shall be Peer Reviewed by a consultant hired by the City at the Applicant's expense. ~~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.~~

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- 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.~~ The Applicant shall submit design plans to reduce light pollution and glare prior to the acceptance of Implementing Project applications for each Planning Area. The Applicant shall submit design plans to promote high quality aesthetics prior to the acceptance of Implementing Project applications for each Planning Area. Both plans shall be reviewed in accordance with SMC 17.80. ~~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.~~

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~~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.

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Mitigation Measures for Cultural Resources

~~24.~~ The applicant shall participate in City sponsored meetings with the Snoqualmie Indian Tribe to identify areas of concern and mitigation measures. ~~engage in additional communication with the Snoqualmie Indian Tribe regarding the Snoqualmie Falls TCP.~~

~~25.~~ Prior to the acceptance of Implementing Permit applications for Planning Area 1, the Applicant shall prepare an Historic Preservation Report in coordination with the ~~The applicant shall consult with the~~ Washington State Department of Archaeology and

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Historic Preservation (DAHP). The report shall address the Japanese community site and other cultural and historic features and shall identify appropriate surveys and preservation actions. The Plan shall be peer reviewed by a consultant hired by the City at the Applicant's expense. ~~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 grounddisturbing activities and construction. All ground disturbance associated with the development of the PCI Plan will be subject to the UDP.

~~27.~~ The applicant shall regularly report to the City regarding its ~~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.~~ The Applicant shall timely advise the DAHP and the City of any development activities that may affect cultural and historic resources. ~~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 the acceptance of an Implementing Permit action that might affect ~~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 and shall advise the City on the significance of any

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exposed cultural or historic feature and appropriate actions to preserve the resource. to evaluate the significance of any structure exposed.

~~32.~~ In Planning Areas 2 and 3, prior to the acceptance of an Implementing Project application for any action that may~~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.~~ The Applicant shall conduct ~~Conduct~~ archaeological surveys within Planning Areas 2 and 3, ~~consisting of~~ using trench excavations~~, and~~ shovel probes and other appropriate methods and report to the City prior to the acceptance of an Implementing Project application., ~~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 and shall report to the City regarding this engagement.~~.~~

Mitigation Measures for Traffic and Transportation

35. Prior to the acceptance of an Implementing Project application for each Phase, the Applicant shall prepare a Construction Traffic Management Plan. ~~Prepare a Construction Management Plan prior to beginning construction.~~ The Plan shall include proposed Haul R~~r~~oute A~~a~~greements and T~~t~~ruck R~~r~~outes prepared in coordination with applicable agencies. ~~shall be established in coordination with the City of Snoqualmie, WSDOT and, if/where applicable, King County.~~ The Plan shall include a monitoring plan to measure traffic levels against traffic levels that have been assumed in the FEIS. ~~,~~The Construction Traffic Management Plan should identify any level of service deficiencies in the proposed haul routes. LOS D shall be maintained on all routes. The Applicant shall be required to improve any LOS deficiencies prior to use of the haul route.
The Plan shall minimize impacts to non-project traffic. The Plan shall minimize impacts to nearby properties. ~~,~~The Applicant shall compensate the agency for any resurfacing required as a result of the impact of construction traffic.
~~35.~~ The Plan shall be Peer Reviewed by a consultant hired by the City at the Applicant's expense. The Plan shall be enforced by a designated site manager who shall regularly report to the City. ~~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, t~~The City may require additional measures to reduce construction traffic impacts as conditions warrant. ~~of clear and grade and/or building permit approval.~~

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36. Prior to the Acceptance of an Implementing Project Application, the Applicant shall provide ~~Develop~~ project-specific design guidelines requiring that building owners provide facilities (e.g., bike storage, showers) to encourage bicycle use.

~~37.~~ The Applicant shall submit a plan for City approval to ensure that ~~E~~employers that are not subject to the Commute Trip Reduction Act shall implement programs that encourage transit use. Prior to the acceptance of an Implementing Project Application, the Applicant shall conduct an analysis of the potential for transit ridership. The Applicant shall identify measures to facilitate and increase transit use for the development. Such measures could include provision of Orca passes, installation of bus stops, coordination with METRO Transit to provide improved transit service to site, and other measures.

~~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 that may be required to achieve the adopted LOS.~~,~~ to achieve acceptable LOS.

~~39.~~ Each phase of the project shall comply with adopted traffic concurrency standards as determined by a traffic analysis that is based on current traffic counts including anticipated impacts from other approved traffic generating projects. The Applicant shall prepare this traffic analysis and it shall be Peer reviewed by a consultant hired by the City at the Applicant's expense.~~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.~~ The following projects have been identified by the City as necessary to accommodate growth in the City. The Applicant shall be required to pay a proportionate share of the cost of these improvements. The Development Agreement shall include a schedule of developer contributions that are consistent with the City's GMA or SEPA impact fee authority. Prior to acceptance of an Implementing Project Application for each Project phase, the City shall determine compliance with traffic concurrency requirements. ~~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.

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- 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 Applicant shall submit a Water Usage and Conservation Plan prior to the acceptance of an Implementing Project application. The Plan shall document the availability of water to serve the Project's phases. The Plan shall include water conservation features. To the extent that the proposed conservation features can be accurately projected, these features may be considered in the calculation of adequate water capacity. This Plan shall be Peer reviewed by a consultant hired by the City at the Applicant's expense. ~~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.~~

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~~42.~~ Prior to the Acceptance of an Implementing Project permit, the Applicant shall ~~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.

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~~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

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winery-related wastewater flow and loading, and dedicate equalization facility to City.

~~44.~~ The Applicant shall submit a Winery Management Plan to the City and the Department of Ecology. The Plan shall ~~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. The City may require the Applicant to ~~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.~~ The Applicant shall obtain certificates of water and sewer availability as required by the SMC. The City's Phase 3 Water Reclamation Facility Improvement shall be ~~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. "Substantially complete" includes the ability to fully serve wine production facilities.

~~47.~~ Each Phase shall document the availability of water and wastewater treatment and conveyance capacity prior to the acceptance of an Implementing Project permit. ~~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.

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~~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. The Development Agreement shall consider cost recovery mechanisms where Applicant constructed improvements provide additional capacity to serve other City utility customers. ~~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.~~ The Development Agreement shall include provisions that require the Applicant to pay ~~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.~~ The Development Agreement shall include provisions to require Applicant contributions to cover the additional service requirements generated by the project.

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This Document was converted from a PDF to WORD and then it was marked up by Snoqualmie Community Action Network (SCAN) with SCAN's comments on this Staff Report. This document is submitted for the record in the Plan Hearing for the Snoqualmie Mill Planned Commercial/Industrial Plan Application on March 30, 2022

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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 Acres[1])

	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/Restaurant[2]	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 Space[4]	69 acres	34 acres	63acres	166 acres [63%]
Roads/ Other Impervious[5]	22 acres	13 acres	21 acres	56 acres [22%]
Total Area [6]	**102 acres**	**56 acres [6]**	**103 acres**	**261 acres**

Notes:

[1]Numbers are rounded.

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

[3]Assumes 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.

[4]Total 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.

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

[6] The 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 should be of sufficient detail to direct the negotiation of the Development Agreement. Development Agreements are an extension of the City's contract authority. The process for negotiating these contracts tend to exclude the public, so the PCI Plan approval is the venue that affords the best opportunity for the full consideration of mitigations and conditions.

This PCI Plan approval process is considering SEPA mitigations, whereas the Development Agreement, as stated above, would only consider "additional State Environmental Policy Act (SEPA) review for subsequent phases of development". Since conditions of approval are required by law to consider SEPA impacts, it is not appropriate to defer important conditions until later negotiations for a Development Agreement.

The language above suggests just that. The PCI Plan approval should include all of the "documentation of mitigation requirements and development conditions", "any deviations from Code provisions", 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 Applicant and City may argue that the project is not sufficiently detailed to allow for the consideration of detailed conditions of approval at this time. This argument may have some validity for Phase 2 and 3, but certainly not for Phase 1 which is being considered as a project level review. For Phase 1, all detailed conditions should be included in the PCI Plan approval and not deferred to the Development Agreement negotiations.

As for Phases 2 and 3, the Development Agreement must not be used as a vehicle to evade a rigorous public review and SEPA process for the approval of development conditions and mitigations. The PCI Plan should specify in more detail which issues will be addressed in the Development Agreement for Phase 1 and which will be addressed in Phases 2 and 3 because they should be fundamentally different. No conditions of approval or mitigations should be finalized in a long term Development Agreement contract for Phases 2 and 3.

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**

*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.

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.

There is documented local experience of gas odors coming from the log storage site. The Department of Ecology has information from a 2008 RH2 that documents pollutants that can be generated by wood waste:
https://apps.ecology.wa.gov/cleanupsearch/document/19419

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. This finding is in dispute. 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 proposes 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.

<u>PCI Plan – Proposed Deviations from Development Standards</u>

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-ofway, but maintains lane widths)	Neighborhood Collector Tintersection with Mill Street entrance to project
Mill Pond Road – Neighborhood Collector	Section B-B	7-foot-wide sidewalk and 7foot-wide planter strip on one (east) side only, south of roundabout	7-foot-wide sidewalk and 7foot wide planter strip both sides
Mill Street – Local Access	Section C-C	• 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	• 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	• 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	• 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. 12.16.230 Compliance.
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. . The EIS provided no documentation that warranted the provision of wider sidewalks. In fact, the EIS failed to provide any analysis of the potential for increased pedestrian activity.

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. There is no documentation to support this contention. 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 pedestrianoriented 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. The proposed lighting plan should be consistent with PSE standards for poles and luminaire typologies. Failure to do so will result in PSE rejecting maintenance responsibility. Furthermore, proposed lighting standards should be consistent with IES lamination standards to protect the City from liability claims related to lighting levels.

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. This finding of fact does not accurately reflect the purpose of SMC 17.55.030 which reads as follows:

    17.55.030 Conditional uses.

    The purpose of a conditional use is to establish review and permit approval procedures for unusual or unique types of land uses in certain zoning districts which, due to their nature, require special consideration of their impacts on the neighborhood and land uses in the vicinity….

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.

    The level of detail that was provided by the Applicant was not sufficient to consider all of the special considerations that a Conditional Use process would provide. The staff report acknowledges this with its statement above regarding "design information about specific buildings has not yet been provided…" The staff report's conclusion that the EIS determined that there would be no adverse impacts to air quality and noise is in dispute, but there are also other impacts that a CUP would consider such as pedestrian safety for families, play areas for children, fire hazards, resident's parking, interferences between residential and commercial related access by vehicles and delivery trucks, utilities, etc.

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.

This finding of fact does not accurately reflect the purpose of SMC 17.55.080. The staff reports assertion that its code provisions do not apply "because the residential uses proposed in Planning Area 1 would not be on separate properties from the commercial and industrial uses" misapplies the intent of the performance standards.

While some of SMC 17.55.080's performance standards refer to "property lines of the lot or site", others do not. And, even for those standards that refer to property lines, the clear intent is to protect certain uses from impacts from other potentially incompatible uses.

A "mixed use" site has an even greater need for 17.55.080's performance standards because of the close proximity of its uses. Moreover, even if the staff report's argument about property lines prevails, it would not apply to condominium residences. 17.55.080 reads as follows:

17.55.080 Performance standards.

A. Purpose. The purpose of this section is to provide guidelines and standards relating to natural and manmade limitations on development. The following performance standards apply to all land uses within the city. Continuous compliance with the performance standards shall be required of all uses, except as otherwise provided for in these regulations. No building or land in any district shall be used for or occupied in any manner so as to create a dangerous, noxious, or otherwise objectionable condition.

B. Air Quality. Performance standards regarding air quality shall be as follows:

1. Odors. Odors from gases or other odorous matter shall not occur in quantities as to be unreasonably offensive beyond the exterior property lines of the lot or site.

2. Smoke. For all districts except the industrial district, smoke shall not be emitted from any source in a greater density of gray than that described as No. 1 on the

Ringlemann Chart. Within the industrial district visible gray smoke of a shade not darker than that described as No. 2 on the Ringlemann Chart may be emitted for not more than four minutes in any 30 minutes. Provisions applicable to visible gray smoke shall also apply to visible smoke of a different color but with an equivalent apparent opacity.

3. Dust. Dust, dirt, fly ash or airborne solids from any sources shall not be in a density greater than that described as No. 1 on the Ringlemann Chart.

4. Gases. Toxic gases or matter shall not be emitted in quantities which may be damaging to health, animals, vegetation or property or which can cause any excessive soiling beyond the exterior of the property lines of the lot or site.

C. Vibration. In all districts except planned commercial/industrial and industrial, vibration from any machine, operation or process shall not be perceptible beyond the property lines of the lot or site. In the planned commercial/industrial and industrial districts, vibration from any machine, operation or process which exceeds three-thousandths of one inch displacement or three-tenths g peak acceleration, whichever is greater, as measured at any point outside the property lines of the lot or site shall be prohibited. The latter shall apply in the frequency range of zero to 5,000 cycles per second. Shock absorbers or similar mounting shall be allowed to permit compliance with this specification.

D. Heat. No use shall produce heat perceptible beyond its lot lines.

E. Glare. No use shall produce direct light or glare beyond its property lines.

F. Noise. Emission of noise and vibration shall not exceed those maximum permissible levels specified in SMC 8.16.050(H).

G. Liquid or Solid Waste. Discharge of any material which can contaminate any water supply, interfere with bacterial processes in sewage treatment or otherwise emit dangerous or offensive material into public or private sewer, water body, or into the ground, except in compliance with Washington State Department of Ecology standards shall not be permitted.

H. Storage and Waste Disposal.

1. All outdoor storage facilities for fuel, raw materials, and products which are stored outdoors shall be enclosed by an approved fence designed for safety.

2. Storage of highly flammable or explosive material shall be stored in bulk above ground.

3. All storage of hazardous material shall be completely enclosed in nonpermeable containers.

4. All materials or wastes which might cause fumes or dust, or constitute a fire hazard shall be stored in containers adequate to eliminate such hazards. (Ord. 1198 § 22 (Exh. D), 2017; Ord. 744 § 2, 1995).

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.

This finding of fact states that it is based on the assumption that "the applicant has proposed that design guidelines for the project would be developed to ensure compatibility". Note the words "would be developed".

The city staff's finding might make sense if the proposal had already been found to have complied with all of the performance standards in SMC 17.55.080 as well as the other substantive requirements and criteria in SMC 17.55.030. But here, the staff acknowledges that the application does not contain sufficient information upon which to make such determinations.

So, the only question that remains is whether a Conditional Use Permit should be applied or some other process such as the Development Agreement or simply a building permit. Neither of these last two process would provide the appropriate level of public review and consideration of impacts that a Conditional Use Process would. There is no factual basis for removing the requirements of a Conditional Use Process as required in the zoning code.

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.

As in finding of fact 33, the staff acknowledges that the proposal does not include enough detail to make a determination that the performance standards, substantive requirements and criteria of SMC 17.55 have been met. The staff's statement above that: "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." makes this clear.

Similar to our comments on Finding of Fact No. 33, the Conditional Use Permit Process is what the code provides for the review of an application to construct a restaurant. The staff would ask the public to give up its well-defined and rigorous CUP for a behind closed door negotiation of a Development Agreement, or even worse, a building permit with none of the necessary review criteria. There is no factual basis for removing the requirements of a Conditional Use Process as required in the zoning code.

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.

As discussed previously, this finding of fact does not accurately reflect the purpose of SMC 17.55.030 which reads as follows:

17.55.030 Conditional uses.

The purpose of a conditional use is to establish review and permit approval procedures for unusual or unique types of land uses in certain zoning districts which, due to their nature, require special consideration of their impacts on the neighborhood and land uses in the vicinity….

Restaurants may be a commercial use, but they have obviously unique characteristics compared to most other commercial and industrial uses. One could easily conclude that a large busy restaurant with a high level of pedestrian and family traffic might

create many conflicts with a busy warehouse distribution center, or a welding and machine shop, and vice versa. One can imagine the unappetizing mixing of welding fumes and marinara sauce. There is no factual basis to conclude that the requirements of SMC 17.55 have already been met, and no basis to conclude that they would be more likely to be met in behind closed doors negotiations.

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.

The staff report's conclusion that the EIS has "provided the City with an opportunity to thoroughly examine and mitigate potential incompatibility" may be true, but it doesn't document that it actually has done that examination and provided appropriate mitigations. The staff acknowledges that no design information has been provided by the Applicant, so it would not be possible to consider the many localized and site/use specific considerations that would arise during a Conditional Use Permit Process.

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.

We will not repeat our comments above with respect to the applicability of the Conditional Use Permit Process, but they also apply in this case. Specifically, the construction of a stormwater outfall presents certain conflicts with other uses that are authorized in the OS-2 zone. One such conflict might be safety considerations for people using a trail nearby. Another might be the exacerbation of flooding that would affect parking.

Our point is not to enumerate all of the potential conflicts. Our point is that the staff needed to show its work as to how it determined that eliminating the performance standards, substantive requirements and criteria of a Conditional Use Permit could be done without affecting the public's health, safety or environment. Since none of the deviations were considered in the FEIS, and since there are no other documents in the record that address them, this finding of fact, and the others that address the elimination of the CUP process are not supportable.

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.

The staff report has not documented how it determined that constructing five story buildings instead of three story buildings would better maintain small-town character. Moreover, the staff report had not documented how increasing building heights would provide greater public amenities. The PCI district requirements for 35% open space and the large areas with critical areas and flood hazards are the only determining factors in the amount of open space and trails, not the increased intensity of development allowed by taller height limits.

Wetland Buffer Deviations (SMC 19.12.170.I) – Permitted uses and alterations in wetland buffers The comments under item No. 49 also pertain to Numbers

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 1 The Deviation bases its justification on its Consultant's report in the FEIS. Appellants at hearing will document the inadequacy of the Applicant's submittals.

This Deviation bases its justification on the Applicant's Consultant's report in the FEIS. Appellants at hearing will document the inadequacy of the Applicant's submittals.

The functions and value of constructed wetlands that are used as stormwater storage ponds are very different than natural wetlands. Constructed wetlands do not make up for degraded or altered wetlands and buffers. The FEIS hearing will document this.

The Plan would drastically change wetland hydrology, not maintain it as required by the Direct Discharge criteria. This issue will be documented during the FEIS hearing.

Notwithstanding any analysis from the Applicant's consultant in the FEIS, the Applicant must comply with the City's code.

The Plan's proposed use of wetlands as drainage facilities does not comply with SMC 15.18.180 because the wetlands have not been approved as described in subsection (C) nor does the project qualify under subsections (A) or (B)

SMC 15.18.180:

Notwithstanding any other provision of this code, drainage facilities shall not be built within a natural vegetated buffer or wetland, provided:
A. Conveyance systems may be approved by the city when there is no feasible alternative;
B. Drainage facilities may be located in the outer 15 feet of a wetland buffer when required by engineering constraints, and when such discharges are designed to be infiltrated into appropriate soils or discharged as surface sheet flow in appropriate slope conditions, pursuant to SMC 19.12.170(H)(3); and
C. Drainage facilities may be allowed in wetlands approved for hydrologic modification and/or treatment in accordance with Guidesheet 1 in Appendix I-D of the Washington State Department of Ecology Stormwater Management Manual for Western Washington (2012, amended in 2014). (Ord. 1198 § 19 (Exh. B), 2017; Ord. 1081 § 2, 2011).

The Plan does not demonstrate how it complies with the following requirements of SMC 19.12.090 (B)(3) Buffer Averaging:

The director may allow wetland or stream buffer averaging only when the buffer area width after averaging will not adversely impact the critical area and/or buffer functions and values, including wetland hydrology that causes short- or long-term changes in native vegetation composition, soil characteristics, nutrient cycling or water chemistry. At a minimum, any proposed buffer averaging shall meet the following criteria:

a. The resulting buffer area is no less than that which would be provided by the standard buffer;

b. The buffer width shall not be reduced by more than 25 percent at any one point as a result of the buffer averaging, and provided, buffer averaging shall not result in a wetland buffer being reduced to less than 25 feet at any one point in any case;

c. The buffer area is reduced by averaging only in those locations where the least significant upland habitat is present within the standard buffer zone, and the areas for increased buffer incorporate the highest functioning upland habitats, where feasible;

d. The buffer area may be required to be enhanced where the buffer is allowed to be reduced, if the buffer is in a degraded condition;

e. The areas of expanded buffer width are contiguous with the standard buffer;

f. Encroachment into the buffer does not occur waterward of the top of an associated steep slope or into a channel migration zone;

g. Encroachment does not occur into the buffer of an associated wetland except as otherwise allowed; and

h. Buffer averaging shall not result in the relocation of any portion of a buffer onto an adjacent property not in common ownership.

The Plan does not show how it complies with the following requirements of SMC 19.12.090 (A) Mitigation Sequencing:

A. Mitigation Sequencing. Conditions to protect critical areas and buffers shall be sequenced as follows:

1. Avoid the impact by refraining from certain actions or parts of an action to the extent feasible;

2. Minimize the impacts by limiting the degree or magnitude of the action, by redesigning the proposed project to minimize impacts and/or avoid or reduce impacts by using appropriate technology, best management practices and design strategies;

3. Remediate the impact by repairing, rehabilitating, or restoring the affected environment;

4. Reduce or eliminate the impact over time by preservation and maintenance operations;

5. Compensate for the impacts by creating, replacing, enhancing, or providing substitute resources or environments;

6. Monitor the mitigation provided for the impact and take appropriate corrective measures when necessary.

The Plan does not show how it complies with the following requirements of SMC 19.12.090 (F) (4) Mitigation Monitoring:

3. Mitigation Monitoring. The time period for mitigation monitoring shall be established per the administrative rule established per subsection (F)(3) of this section, and shall be subject to the following minimum standards. Monitoring for compensatory mitigation for alteration of a wetland or stream shall occur for a minimum of five years. In the case of forested and scrub-shrub wetlands, monitoring shall occur for a minimum of 10 years, with reports submitted in years 1, 2, 3, 5, 7, and 10 and shall be secured with a bond or assignment for security.

Additionally, the Plan's reliance on a non-profit to maintain common areas would jeopardize the monitoring requirements in SMC 19.12.090

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 that 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. This conclusion is being challenged in the FEIS hearing.

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. This characterization of the wetland is being challenged in the FEIS hearing.

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. The wildlife connection could be established even if the standard buffer were applied.

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. The wildlife connection could be established even if the standard buffer were applied.

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. This statement is at issue in the FEIS hearing.

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

Special Note:
The timing of the consolidated hearing has the FEIS hearing following the Plan Public Hearing. This is unfortunate because public comments on the Plan should be informed by the FEIS hearing. So too, this staff report was made public on March 22, 2022 just 8 days before the Plan Public Hearing. This staff report should also have been informed by the FEIS hearing. Our comments on this section of the staff report should be consolidated with our comments on the FEIS.

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. The "error" in the Draft EIS affected other elements of the environment, not just Aesthetics.

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. The FEIS does not document that there are no feasible alternatives to the location of roads and utilities within the CMZ. While there may be an existing road within the CMZ, that road experiences far less traffic than the relocated road. The Applicant has the option of securing alternative access and its unwillingness to do so is not evidence of lack of feasibility. Areas of channel migration pose special risks to utility lines and that's why they are prohibited there. The staff suggestion that the outfall must be located within the CMZ may seem logical, but the design of the outfall needs to take special precautions to address the CMZ.

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. This assertion is being contested in the FEIS hearing. 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. This assertion is being challenged in the FEIS hearing. The likely presence of toxic pollutants in the site's soils pose special risks that have not been addressed. 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 A list of best practices is not the same as a requirement to use best practices. 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. This assertion has not been documented. There is no evidence in the record regarding projected conflicts between construction and other traffic, their duration or frequency of occurrence. Moreover, the site is near a busy hotel and tourist area and the diesel exhaust emissions from heavy equipment will be an adverse environmental impact.

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. This contention is based on the idea that the benefits of more efficient vehicles and regulations can be totally allocated to this project. This ignores the reason why those regulations are in place. The goal is *improvement* in air quality with resulting health benefits, not simply enabling more development. 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. The assertion that the placement of a new employment center with 3500 jobs and a new tourist destination on this site would have no air quality impacts is not credible on its face. 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). The adequacy of this modeling is at issue in the FEIS hearing.

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. It is well documented that runoff from lawns is nearly as high as from impervious surfaces with very little ground water recharge. Clearing vegetation on construction sites usually removes and compacts the "duff layer" and this is a primary cause of higher runoff.

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. There has been no comprehensive analysis of the groundwater connections on the site. Thus, the City is "flying blind" on a site that is a brownfield site of the most severe category.

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. This statement is not supported by the FEIS. Since the site is only implementing basic water quality measures, all of the benefits of enhanced water quality treatment will be lost. There are many technical reports that detail the benefits of water quality treatment. The King County Surface Water Drainage Manual describes enhanced water quality treatment goals as follows:

Treatment goal: The Enhanced Basic WQ menu is designed to achieve > 30% dissolved copper removal and > 60% dissolved zinc removal; in addition to Basic treatment (80% TSS removal) for flows up to and including the WQ design flow or volume (defined in Section 6.2.1, p. 6-17). The goal assumes that dissolved copper

concentrations for untreated runoff are between 5 and 20 micrograms per liter (u/L), and that dissolved zinc concentrations for untreated runoff are between 20 and 300 micrograms per liter (ug/L).

The project site likely contains large quantities of heavy metal pollutants, so it likely the failure to remove zinc and copper will have negative effects on downstream salmonid species.

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). This issue is in dispute in the FEIS hearing.

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. This issue is in dispute in the FEIS.

87. The project would avoid direct impacts on all wetlands and jurisdictional watercourses within Planning Area 1. This issue is in dispute in the FEIS hearing. To avoid direct wetland impacts on Wetland 12 which abouts 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 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. This issue is in dispute in the FEIS hearing.

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 Snoqualmieapproved 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. While theoretically true, the details of this issue are in dispute in the FEIS hearing.

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. The failure to provide enhanced water quality treatment, the failure to identify and remove or cap contaminants, the plan to deep grade large areas of the site, and the plan to construct a large regional type employment center and tourist destination, all dwarf any minor improvements that may occur from wetland construction and restorations whose benefits are themselves under dispute in the FEIS.

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. This would only affect new uses; previous contaminants would be disturbed and released into the environment through the large scale grading proposed. Additionally, the elevation calculations are based on the 100 year storm, a level that is not expected to be high enough with the effects of climate change. Additionally, over time it is likely that occupants of the site would locate hazardous substances on portions of their properties that are not elevated.

Some portions of the property will still lie within the flood zone. Does this proposal intend to regulate or control the storage and use of hazardous substances in those lower-lying areas? Absurd. The fact that extensive excavation is proposed means that extra care must be applied to identify areas of contamination before this significant regrading is begun to ensure that contaminated soils are dealt with properly, and contamination not spread over a greater area. Redesigning the floodplain is NOT an effective control for the risks of storage and use of hazardous substances. The buildings in which such materials are used and stored should be designed to provide effective containment for such materials, so that spilled materials never reach the ground.

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. This issue is in dispute in the FEIS hearing.

This investigation was entirely out of scale (too small) with the 102-acre coverage of Planning Area 1 and its near-century of industrial and residential use. Ten test pits were excavated in a 100-acre site. That's like throwing 10 darts at a 10,000 square foot dart board with one's eyes closed, expecting to hit the bullseye. Moreover, this report was a "summary" only, and provided none of the data or data quality assurance parameters from the laboratory. There were no additional samples from known uncontaminated locations to test the theory of naturally occurring arsenic, nor were there samples to prove that petroleum-weight hydrocarbons were from biogenic material as opposed to petroleum products. The

investigation was entirely too small, was not aimed at areas of previous use where contamination was likely (such as near the former railroad tracks), nor at finding what might have been buried along with the woody fill that was as thick as 16 feet.

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. This issue is in dispute in the FEIS hearing. The monitoring wells are woefully inadequate to identify the location and movement of contaminants in the groundwater.

One sampling round from four wells is completely inadequate to demonstrate that contaminated groundwater is not passing from Planning Areas 2 and 3 into Planning Area 1. Ecology generally requires eight rounds of quarterly groundwater monitoring (i.e., sampling every three months for two years) across a site (which in this case would include Areas 2 and 3) from a well-planned network of wells to determine the groundwater flow path and its seasonal variations across a contaminated or potentially contaminated site. There are often seasonal variations in groundwater flow direction and velocity, and these variations cannot be determined from sampling a very small number of wells only once. These variations also impact contaminant concentrations. Making any conclusions regarding contaminant migration in groundwater based on a one-time sampling event is simply bad science. And again, the actual data were not provided in the report.

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. This issue is in dispute in the FEIS hearing.

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. History shows that requirements do not necessarily lead to proper actions. It is not accurate on its face to say that risks of spills from industrial and commercial uses are "low or unlikely". This contention give a disturbing insight into the City's precautionary approach, or lack thereof, especially given the project's proximity to the Snoqualmie River and the fact that most of the site is in the floodplain.

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 cannot be determined without doing the requisite investigatory work and developing a remediation plan that has been approved by all agencies with jurisdiction. It could turn-out that any development in some portions of Areas 2 and 3 would be prohibited, and in other areas allowed uses would be limited. No Plan for Planning Areas 2 and 3 should be approved until the remediation work is fully defined and contracted. 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.

No consideration was given, however, to the fact that cleaning up heavily contaminated sites directly adjacent to active residential and commercial entities can be problematic. Excavation creates dust, even if typical "best management practices" are used. Has any thought been given to protecting the future residents and employees in Planning Area 1 from dust containing PCBs or dioxins while Planning Areas 2 and 3 are being remediated? The only way to do this effectively is to perform at least those critical remediation activities BEFORE building out 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 This statement is incorrect and in dispute in the FEIS hearing., 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). This is not a complete list of requirements and compliance is likely to be required in Area 1. The requirements of RCW 64.44.060 will also apply.

A comprehensive remedial investigation must be accomplished before plans are firm for the development of Planning Areas 2 and 3. Some of the contamination has been identified in these areas, and some of the necessary remedial work has been done. But there are still many unknowns. Several of the known contaminated areas have been partially remediated, and others have been remediated to standards that do no meet present day cleanup requirements. Most of these sites were addressed because former Weyerhaeuser employees remembered the incidents that caused the contamination. But still extant human memory is not sufficient to address nearly 100 years of industrial activity on this property, nor substitute for a rigorous study of groundwater quality (and behavior) and soil contamination.

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.

Nothing is stated in this section regarding development within the Snoqualmie River channel migration zone. The CMZ is delineated as a protection (by exclusion) for future development. It appears the plan for Planning Area 1 would include some building within a portion of the CMZ. Some simple resizing now might prevent serious future losses.

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 PostAnnexation 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. The changes themselves are not the issue in this context, the impacts from these changes are.

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. This matter is in dispute in the FEIS. The project would create a large new regional-like employment center with 3500 jobs and tourist destination. On its face, this is not compatible with the surrounding rural uses. The old sawmill supported the forest and rural economy. There is absolutely no comparison between the intensity, level, or impacts of the two uses.

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. The full requirements of the City's Shoreline Master Program have not been applied to this plan.

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 The design review process is proposed to be truncated with no involvement by the City's Design Review Commission. 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.

This growth forecast does not consider the added growth from those 3,410 employees who may wish to locate in the City and nearby. In fact, the Plan cites this as a factor in the reduction in transportation emissions and congestion, but apparently doesn't wish to disclose those numbers here.

The City is exceeding its regional growth targets as established by the Growth Management Planning Council and the Puget Sound Regional Council. The City's public statements to the effect that these targets are not "caps" misdirects the public and policymakers.

Regional growth targets are important and exceeding them significantly could result in the loss of federal funds for transportation projects, and could lead to other actions by regional planning agencies. One test of a City's Comprehensive Plan is whether it complies with the Regional Growth Management Policies, and those policies and the Growth Management Act require cities that plan to do so in a coordinated way with other governments and agencies. Failure to do so could result in findings of invalidity by the Growth Management Planning Board and possible actions by the State Department of Commerce.

Regional growth targets matter. It is likely that the City will need to revise its land use element and other policies during its 2024 Comprehensive Plan Update to lower its growth rate.

In response to being advised or warned by the Puget Sound Regional Council (PSRC) that it was exceeding its growth targets the City adopted a Resolution adopting policies intended to respond to the PSRC and to better comply with regional growth management policies. The City has not fully implemented the requirements of this Resolution: https://www.snoqualmiewa.gov/DocumentCenter/View/13746/Resolution-1380-Calling-for-PSRCs-Full-Cert-Transportation-Element-of-Snoqualmie-2032-Comprehensive?bidId=

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. The adequacy of this analysis is in dispute in the FEIS Hearing.

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. The proposed landscaping is insufficient to provide the visual barriers that are described here.

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 This statement does not consider the fact that there would be many more tall buildings than were previously on the site or are on the Salish site. The overall Constructed profile will be a massive intrusion on the rural and scenic Snoqualmie Valley.

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. This is architectural gobbledygook. This development will forever change the character and feel of the upper Snoqualmie Valley and will accelerate development pressures to the point

that the farming industry will be at great risk, and the rural character of the region will be severely diminished.

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. This massive employment center and tourist district will flood the sky with light and affect the entire upper Snoqualmie Valley.

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. The landscape plan does not provide for "heavy vegetation" along the site perimeter. No analysis analysis of light pollution has been conducted.

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. These standards are

weaker than existing standards as implemented by a Design Review Commission. They are pitifully weak compared to design standards in many other cities in the Puget Sound region.

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). If this process is left until the building permit stage, the City's discretionary authority will be less and the City's requirements would be vulnerable to legal challenge. Moreover, at this stage the public's involvement is de minimis. Public involvement is at the heart of any effective design review process.

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). The International Dark Sky Association does not promulgate standards, per se. They do have a Model Lighting Ordinance: https://www.darksky.org/our-work/lighting/public-policy/mlo/

137. A condition of approval should require that no implementing project shall be vested until the City adopts this ordinance. As an alternative the City could adopt a condition of approval that would require the Development Agreement to establish design guidelines substantially in compliance with that ordinance.

Historic and Cultural Resources

The issue of impacts to Historic and Cultural Resources are in dispute in the FEIS hearing.

138. 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).

139. 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.

140. 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.

141. 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).

142. 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.

143. Development of the Proposal would not directly affect Snoqualmie Falls, a Traditional Cultural Property (TCP). The project would have many indirect effects on Snoqualmie Falls, such as the potential of highly contaminated water flowing over them. The increase in urban pressures and impacts would be huge and have a negative effect on the Falls.

144. 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

145. 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. This statement is not true. The EIS failed to either identify potential transit ridership or the impact on existing transit service. There was no attempt to identify mitigating measures which would increase the potential for transit ridership related to the Mill site. This and other issues are in dispute in the FEIS.

146. 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.

147. 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.

The Plan proposes a project level approval for Planning Area 1, but a programmatic level for Planning Areas 2 and 3. It is recognized that the development on Areas 2 and 3 may not occur or may be very different depending on future analysis of contamination and other issues. For this reason, the internal circulation and ingress/egress for Area 1 should be able to stand on its own and be sufficient even if there is no future development on Areas 2 and 3. Additionally, provision should be made to provide separate truck and equipment access to accommodate any long term and extensive site remediation work. This access should be on the Applicant's property and not externalized to other public or private roads.

148. 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. This haul road is insufficient, especially if extensive remediation work is required in the future. Given the environmental constraints, an alternative route should be included in the Plan now and not wait until some future planning process.

149. 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. The analysis of the traffic impacts are in dispute in the FEIS. The impact is indeed significant. Planning Area 1 should not be allowed to proceed until improvements are completed to the SR 18/I-90 interchange.

150. 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). There is insufficient information in the record to identify the scale and nature of these impacts. Since the Applicant is seeking project level approval for Planning Area 1, this should be conditioned in detail now.

151. 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. These traffic data are in dispute in the FEIS hearing.

152. In 2023, development of Planning Area 1 would not result in the failure of any studied intersection to meet City LOS standards. The operative word here is "studied intersection". The City should have studied all intersections included in the City's traffic concurrency and LOS plans. As stated below, the intersection approached will operate at LOS F which is failure. 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). The Project must comply with the City's Concurrency standards whether or not the project caused the failure or not. Condition No. 38 does not ensure this. A pro-rata payment does not bring the project into compliance with concurrency standards. This is established law based on the Growth Management Act. The issue of transportation related impacts is in dispute in the FEIS.

153. 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. This failure in meeting LOS standards should lead to a condition of approval that no Implementing Project application for Planning Areas 2 and 3 will be accepted until a legal determination can be made that any development in these areas will comply with the City's concurrency standards. This issue is in dispute in the FEIS hearing.

154. 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.

155. Improvements to these intersections would bring operations at them to acceptable level of service. This has not been documented in the FEIS or elsewhere in the record. The operative standard is not "acceptable level of service" but is instead "will not exceed the adopted LOS". 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. The payment of a fair share cost does not meet the test for concurrency. 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). Planning Areas 2 and 3 should not be allowed to proceed until funding is secured to address all substandard LOS conditions.

156.

157. 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

158. 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. There is no information in the record that shows that the City considered Health Department noise standards. The issue of noise levels and analysis is an issue in the FEIS Hearing.

159. 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.

160. 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. This statement does not consider adopted Health Department noise standards.

161. 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.

162. 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. The detection of noise *differences* is not the same as the health and comfort levels of different dBA levels. A change of 3dBA at high levels has different effects than at lower levels.

163. 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.

164. 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. The issue of putting more people living and working next to high noise areas has not been considered.

Parks

165. 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.

166. 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.

167. 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

168. 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.

169. 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.

170. 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. The Plan record does not show an analysis of fire flow to support large new areas of commercial development. The Fire Department's purported response is not an adequate measure. Nothing in the record suggests that Fire Department personnel were asked for detailed examination of staffing and equipment levels for various levels of development. It is likely that if the Department had been asked about a 3400 job employment center, restaurants, manufacturing, mixed uses and a destination tourist district they would have responded differently than 'we have excess staff'.

171. 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. The student generation factor used here is inaccurate. The Snoqualmie School District's 2021 Capital Plan (page 22) uses a student generation factor for multi-family housing units of .306: https://kingcounty.gov/depts/local-services/permits/planning-regulations/~/media/depts/local-services/permits/legislation-public-review/Att_E_SnoValley_DRAFT_2021_CFP.ashx

Applying this factor to the proposed 160 housing units yields an expected increase of 49 additional students.

Utilities

172. 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.

173. 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.

174. 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 12inch 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.

175. 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. One of the purposes for master planned developments is the orderly planning of public utilities. The determination of water supply should not be delayed until the issuance of building permits. 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).

176. 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). The projected water usage is determined by the Applicant to be 239 ERUs for Phase 1 and 799 ERUs for the total project. This means that Phase 1 will use up 31% of available sewer capacity and the entire project will use up 104% of available sewer capacity. This assumes that the staff's numbers are better than their student generation numbers. Moreover, the staff analysis does not properly account for projects in the pipeline or likely new applications in the future.

177. 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.

178. 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).
A payment of a pro rata share of the costs of additional sewer treatment does not ensure the construction of the required new facilities. The Plan should be conditioned with a requirement that Implementing Project permits will not be accepted unless a finding of fact can be documented that there is adequate sewer capacity.

179. 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.

180. 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 from a large 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. There is no basis in the FEIS for this statement. The project will not provide enhanced water quality treatment, so copper and zinc from this large new commercial and industrial development will be untreated.

181. 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.

182. 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.

183. 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).

184. 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.

185. 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).

186. 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.

187. 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 Polices 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

The staff has not documented how these development standards do not "protect health, safety, or the environment". SMC Ch. 12.16 - Street design standards are standards that protect "safety". SMC 17.55.020 – Zoning Table of Uses is intended to "protect health, safety and the environment" . SMC 19.12.170.I. (permitted uses and alterations in wetland buffers) is quite clearly a standard that protects the environment.

The staff may argue that the deviations will not have a significant adverse impact on these standards, but Section I prohibits any deviation from a standard that 'protects health, safety and the environment. It is not necessary for there to be a showing of insignificant impact, it is merely necessary to determine if the standard is based on 'public health, safety or the environment' and if it is then that standard is not elgible for a request for deviation.

None of these deviations were specifically considered in the FEIS, so even if the Applicant were permitted to request deviations from these standards based on minimal environmental impact, that was a matter than needed to be analyzed in the FEIS. The Appellants to the FEIS had no opportunity to address these deviations in a SEPA context because they were not known until March 22, 2022.

With Respect to Deviations from Conditional Use Processes:

The level of review for Conditonal Use Processes is very different and arguably more rigorous than that for this Plan. These proceedings should consider whether the elimination of a CUP process would provide equivalent safeguards for the public health, safety and environment.

SMC 17.55.030 sets forth the standards that should be applied by the Hearing Examiner:

B. The hearing examiner shall be guided by the following criteria in granting a conditional use permit:

1. The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and in the district in which the subject property is situated;

2. The proposed use shall meet or exceed applicable performance standards;

3. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building, and site design;

4. The proposed use shall be in keeping with the goals and policies of the comprehensive plan;

5. All measures should be taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.

F. A performance bond shall be required by the hearing examiner for any elements of the proposed project which are deemed crucial to the protection of the public welfare. Such bond shall be in an amount equal to 150 percent of the cost of the installation or construction of the applicable improvements.

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 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 PrestonSnoqualmie 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, highquality 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, highefficiency 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 nonfunctional 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 nonmotorized 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.

This Document was converted from a PDF to WORD and then it was marked up by Snoqualmie Community Action Network (SCAN) with SCAN's comments on this Updated Application. This document is submitted for the record in the Plan Hearing for the Snoqualmie Mill Planned Commercial/Industrial Plan Application on March 30, 2022

Snoqualmie Mill

Planned Commercial/Industrial Application
UPDATED PCI Application Submittal

Updated March 2022
Updated January 2022
March 2017

GOLDSMITH
LAND DEVELOPMENT SERVICES

Snoqualmie Mill

Planned Commercial/Industrial Application
UPDATED PCI Application Submittal

Prepared for:
Snoqualmie Mill Ventures, LLC

Updated March 2022
Updated January 2022
March 2017
Job Number: 17500

Table of Contents

I. Executive Summary UPDATED PCI Application

II. PCI Intent and Provisions

III. Overall Project Location and Background Information

IV. Proposed Updated PCI Plan Master Plan

V. Proposed Deviations to SMC Development Standards for PCI Master Plan

VI. Sources Referenced

Appendices

A. City PCI Determination of Completeness Application Review Memorandum, April 19, 2017 and Applicant Response Letter (January 14, 2022)
Perteet Memorandum – PCI Plan Application Comments, April 4, 2017 and Applicant Response Letter (January 14, 2022)

B. City Reference Documents / Maps
- Annexation Map
- Zoning Map
- Comprehensive Plan Map

C. Regulatory Framework

D. DEIS Appendix A - Master Drainage Plan (April 2020) – Chapter 6

E. UPDATED Snoqualmie Mill PCI Plan Application Plans – March 2022 (11 x 17, color, b/w)

I. EXECUTIVE SUMMARY – UPDATED SNOQUALMIE MILL PLANNED COMMERCIAL/INDUSTRIAL (PCI) PLAN APPLICATION

Introduction – UPDATED Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

Snoqualmie Mill Ventures, LLC (the "Owner" and "Applicant") proposes to develop the Snoqualmie Mill site in accordance with the City of Snoqualmie Planned Commercial/Industrial (PCI) Plan (PCIP) requirements of SMC 17.20.050.

On March 22, 2017, Snoqualmie Mill Ventures, LLC formally submitted the Snoqualmie Mill Planned Commercial Industrial Plan (Snoqualmie Mill PCIP) Application to the City of Snoqualmie. This application for development was prepared to comply with the submittal requirements found in the PCI District Regulations required by SMC 17.20.050(J) as interpreted and applied by the City. The Snoqualmie Mill PCIP proposes phased development, with specific information provided for the first phase and more detailed design elements to be developed during later site development applications for subsequent phases.

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In addition, the Applicant agreed to prepare an Environmental Impact Statement (EIS) for the Snoqualmie Mill PCIP Application. As the lead SEPA Agency, the City of Snoqualmie followed the procedures for phased environmental review, as authorized by the SEPA Rules (WAC 197-11-060(5), SMC 19.04.020) for the preparation and publication of the Snoqualmie Mill PCI Plan Draft Environmental Impact Statement (April 2020) and publication of the Final Environmental Impact Statement (December 2021). Phased review allows environmental review to occur in stages, and to be coordinated with the phases of master planning for a proposal. Portions of a project that are still in the conceptual stage of planning may be evaluated more generally in the initial environmental document. Once more focused planning is developed, detailed analysis will be presented in subsequent environmental documents.

On April 19, 2017, the City of Snoqualmie issued a Determination of Completeness Memorandum which determined that the PCIP Application was deemed complete and that all necessary application materials were included. The memo also reviewed the application for consistency with the Pre-Annexation Agreement, approved AIP, and the Snoqualmie Municipal Code (SMC) 17.20 – Planned
Commercial/Industrial Regulations specific to application. Review of completeness consistent with SMC 14.30.050 found the application to be generally complete.

The City's memorandum outlined requests for additional information to fulfill the requirements of a programmatic level planned unit development (PUD) permit application. This memorandum is not in the record The contents of this UPDATED Snoqualmie Mill PCI Plan Application (January 2022) are in response to the City's memorandum and are consistent with the proposed master planning and site development elements identified in the published project DEIS and technical appendices, and relevant substantive comments and responses published in the DEIS and FEIS. The project details of the Snoqualmie Mill PCI Plan EIS are hereby incorporated herein by reference.

The UPDATED PCIP Application is supported by two (2) Response Letters to the City's memorandum (April 19,2017), and City Review Engineer (Perteet) comments (April 4, 2017) submitted in the

updated application materials. Additional reference copies of the response letters are in Appendix A of this UPDATED PCIP Application book.

Additionally, the Snoqualmie Mill PCIP Plan Set (January 2022) has been UPDATED and expanded consistent with the published proposed master planning and site development project details in the

project DEIS and technical appendices, and subsequently the publication of relevant substantive comments and responses published in the FEIS.

The Snoqualmie Mill PCI Plan Application book and Snoqualmie Mill PCI Plan Application Plans are hereby transmitted to the City of Snoqualmie for final review and approval.

It should be noted that throughout the Snoqualmie Mill PCI Plan Application book references are made specifically to the titled plan sheets of the UPDATED Snoqualmie Mill PCI Plan Application Plans (January 2022). Reduced copies (11 X 17s) of the application plan set sheets are provided for quick reference in Appendix E. Hard copies of the UPDATED PCIP Application binder and full size plan sets are available upon the City's request.

Sections of this UPDATED Snoqualmie Mill PCIP application have been modified from the original March 2017 application to provide a better flow of the project information required for the application and refinements made through the EIS process.

PCI Zoning District Flexibility from Standards and Development Agreement

The PCI zoning district regulations applicable to the site encourage **"imaginative well-designed master planned commercial-industrial development"** proposals (SMC 17.20.050 A), and provide **flexibility from fixed, quantitative standards**. The district authorizes the City Council to approve deviations from general standards where they determine that the deviation will not threaten health, safety, or the environment. (SMC 17.20.050 I). The City did not show its work in making these determinations.The Applicant is proposing deviations to the City's development standards. The deviation requests are specifically identified in Section V of this UPDATED PCIP Application.

Under RCW 36.70B.170, a local government may enter into a development agreement with a person having ownership or control of real property within its jurisdiction. A development agreement must set forth development standards and other provisions that shall apply to and govern and vest the development, use, and mitigation of the development of the real property for the duration specified in the agreement. A development agreement shall be consistent with applicable development regulations adopted by a local government planning under chapter *36.70A RCW. RCW 36.07B.170(1). Development agreements are required to be consistent with code*

It is anticipated that a Development Agreement ("DA") will likely be prepared and entered into between the Applicant and the City of Snoqualmie, in conjunction with the Updated Snoqualmie Mill PCIP Application. The development agreement will guide the overall site development and more specifically identify development regulations to which the project is vested in the Snoqualmie City

Code (SMC) There is no defined process for the consideration of the Development Agreement. Provisions should be made for SEPA, public notice and hearing.

Therefore, on behalf of Snoqualmie Mill Ventures, LLC., the Applicant, we submit the UPDATED Snoqualmie Mill PCIP Application (January 2022) submittal package to the City of Snoqualmie for final review and approval.

II. PLANNED COMMERCIAL/INDUSTRIAL INTENT AND PROVISIONS

The Snoqualmie Mill PCIP intends to comply with the requirements found in the PCI District Regulations at SMC 17.20.050.

The proposed Snoqualmie Mill PCIP is supported by the preparation and issuance of the Draft Snoqualmie
Mill PCI Plan Environmental Impact Statement (DEIS), April 27, 2020, and the Final Snoqualmie Mill PCI Plan Environmental Impact Statement (FEIS) December 8, 2021. Both documents are incorporated by reference in this UPDATED PCIP Application.

17.20.050 Planned Commercial / Industrial Provisions - SMC 17.20.050

The PCI District provisions for review and conformance are identified below together with responses as to 'how the specific intent and applicable aspects of the proposed plan' is addressed by the Amended PCI Plan application. These responses are based on and supplemented by information contained in the Snoqualmie Mill PCI Plan EIS (City of Snoqualmie 2020, 2021).

A. The purpose of the planned commercial/industrial district is to provide for imaginative, well-designed, master-planned commercial/industrial development containing compatible and complementary uses,Uses have not been sufficiently identified in all three phases to allow the determination of compatible or 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 two 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; The Plan anticipates 3500 new jobs and would thus qualify as a large urban level employment center.*
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 The Plan shows no connections to regional pedestrian or bicycle corridors.*
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. The Plan does not address all adjacent or nearby properties in this regard.*

The UPDATED Snoqualmie Mill PCIP Application proposes development of approximately 1.83 million gross square feet of light industrial/manufacturing, warehouse, office, retail, and residential uses divided into three distinct Planning Areas. A majority of the overall site (166 acres, 64%) 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 preservation and integration of valuable elements of the site's history in the development plans as feasible.

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.

The approved PCIP Plan shall become the basis of a binding site improvement plan or subdivision comprised of the existing tax parcels of the contiguous SMV ownership. A lot line adjustment will be processed concurrently with the PCIP to reconfigure the tax parcels to serve as the legal lots associated with future site development activity permits and/or commercial building permits. Section B does not mention lot line adjustments. Lot line adjustments are administrative actions intended for small modifications to property boundaries. As used here, they appear to be an attempt to evade subdivision or other requirements. The details of the "lot line adjustments" should have been part of the application.

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.

There are eight (8) tax parcels that collectively make up the ownership of the Snoqualmie Mill PCIP site area. Each tax parcel is in excess of the required two acre minimum in Provision C. The smallest existing parcel, Tax Parcel No. 0324089070 is 2.17 acres and therefore the permitted uses are not regulated by the Business-General (B-G) district standards. Will the lot line adjustments result in any parcels that would fall below two acres in size?

D. In the event two or more contiguous parcels in common ownership lie in whole or part in both the planned commercial/industrial 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 may be included, provided they constitute no more than 15 percent of the total acreage of the proposal.

The Snoqualmie Mill PCIP Application represents the applicant/owner's objective to develop the site, in phases consistent with Provision D. as one distinct and cohesive project with integrated and interconnected aspects of the required design elements of the PCI District encapsulated together. The proposed design elements incorporate together to create a unique commercial and industrial center with various types of light industrial/manufacturing, warehouse, office, and retail uses and employment opportunities. Additionally, unique residential uses are proposed that could provide live and work opportunity.

The PCIP site area is comprised of eight (8) tax parcels owned by Snoqualmie Mill Ventures, LLC, the owner/applicant. A lot line adjustment application will be submitted to the City to modify the boundaries to align with the proposed Planning Areas 1, 2 and 3 and processed concurrently with the PCIP Application. No new lots would be created. The lot line adjustment would be processed concurrently with the PCIP Application to create legal tax parcels/lots corresponding directly to the proposed Planning Area 1, 2 and 3 boundaries. The reconfigured legal tax parcels/lots will provide the basis for legal descriptions of future development phases and associated lease or ownership by end users. The lot line adjustments should have been detailed in the Plan application.

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

The Snoqualmie Mill site will be redeveloped into a mixed-use employment center changing the site from a dormant heavy industrial brownfield property into a cohesive mixed-use master planned development including residential, retail, light industrial, warehouse, and office amongst large areas of open space uses that will be incorporated both horizontally and vertically.

Planning Area 1 would contain the greatest mix of uses, including warehouse/manufacturing, light industrial, retail restaurant and residential. The mixed-uses include the proposed 160 residential units constructed in / over mixed-use buildings in this area of the site.

Planning Area 2 would contain primarily warehouse and manufacturing surrounded by open space.

Planning Area 3 would include the greatest amount of building space, consisting of campus/office with potentially some limited ancillary restaurant opportunity catering to employees.

See Proposed UPDATED PCI Master Plan Section IV and the EIS for a complete description of the Project Level application for Planning Area 1 and Programmatic Level application for Planning Areas 2 and 3.

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.

The master plan site totals approximately 261 acres. The underlying eight (8) contiguous ownership tax parcels of the Snoqualmie Mill property are all owned by Snoqualmie Mill Ventures, LLC. As noted in Section D above, a lot line adjustment application will also be submitted to modify the boundaries, but not the number, of existing lots.

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.

The project proposes 64% open space.

Preserving open space is a key element of the PCIP with almost two-thirds of the site remaining undeveloped and dedicated to open space, trails, landscaped areas, wetlands (including restored and enhanced buffers), habitat and compensatory flood storage.

Landscaping is proposed to enhance and tie the various open spaces together with the planned development areas. An overall landscape plan for Planning Area 1 is included in the PCIP Application, see Appendix E for the Updated PCI Plan set. The intent of this section is provide open spaces above and beyond critical areas and their buffers. The Plan should demonstrate that 35% of the total acreage is open space not counting critical areas and their buffers.

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.

Development of the site would occur in three distinct areas, over an approximate 10-to-15-year period. Each planning area is equivalent to a phase of development and could be developed in two or more sub-phases. Planning Area 1/Phase I is assumed to be completed by 2023; Planning Area 2/Phase 2 completed by 2026; and buildout of Planning Area 3/Phase 3 by 2032. Construction of each phase is estimated to take approximately two years. Development timing will depend on market and economic conditions and infrastructure requirements and is less certain for Planning Areas 2 and 3. Proposed circulation, solid waste disposal and recycling, and water, sewer and stormwater management systems are designed accordingly. The Plan does not address development "which can reasonably be anticipated on adjacent or nearby lands". This is a major omission that will be documented in the FEIS hearing. The Applicant's own statement makes no reference to adjacent or nearby lands and only mentions its own ownership parcels. This is prima facie evidence that this condition has not been met. Moreover, the Applicant concedes here that it has not considered "adequate and efficient expansion" for even its own parcels.

I. It is the intention of this section to encourage development proposals not constrained by fixed development standards, and toward that end, deviation from development standards of general applicability throughout the city may be authorized when the city council, with the advice of the planning commission, finds that such deviation would advance the purpose of the district as set forth in subsection A of this section, provided deviation shall not be allowed from development standards deemed necessary to protect health, safety or the environment. Any such deviations shall be included in the approved plan for the planned commercial/industrial development.

Deviations from certain development standards are proposed with this PCIP. The Applicant has included these deviations to development standards as part of this UPDATED application. Requested deviations include the following. Descriptions and Justifications of the deviation requests are provided in Section VII of this UPDATED Application.

- **SMC Ch. 12.16 - Street design standards**
- **SMC 17.55.020 - Requirement for conditional use permit for second story dwelling units above nonresidential uses in PCI zone**
- **SMC 17.20.050.I - Requirement for conditional use permit for restaurants in PCI zone**
- **SMC 17.55.020 Table 1 - Requirement for conditional use permit for retail restaurants, specifically tasting rooms in PCI zone**
- **SMC 17.55.020 - allowing roads, utilities, trails and accessory parking for commercial, industrial and residential uses in the OS2 zone**
- **SMC 17.55.040 (height limits)**
  - **SMC 19.12.170.I. (permitted uses and alterations in wetland buffers)**

The Applicant has not documented how these development standards do not "protect health, safety, or the environment". SMC Ch. 12.16 - Street design standards are standards that protect "safety". SMC 17.55.020 – Zoning Table of Uses is intended to "protect health, safety and the environment" . SMC 19.12.170.I. (permitted uses and alterations in wetland buffers) is quite clearly a standard that protects the environment.

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The Applicant may argue that the deviations will not have a significant adverse impact on these standards, but Section I prohibits any deviation from a standard that 'protects health, safety and the environment. It is not necessary for there to be a showing of insignificant impact, it is merely necessary to determine if the standard is based on 'public health, safety or the environment' and if it is then that standard is not elgible for a request for deviation.

None of these deviations were specifically considered in the FEIS, so even if the Applicant were permitted to request deviations from these standards based on minimal environmental impact, that was a matter than needed to be analyzed in the FEIS. The Appellants to the FEIS had no opportunity to address these deviations in a SEPA context because they were not known until March 22, 2022.

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With Respect to Deviations from Conditional Use Processes:

The level of review for Conditonal Use Processes is very different and arguably more rigorous than that for this Plan. These proceedings should consider whether the elimination of a CUP process would provide equivalent safeguards for the public health, safety and environment.

SMC 17.55.030 sets forth the standards that should be applied by the Hearing Examiner:

B. The hearing examiner shall be guided by the following criteria in granting a conditional use permit:

1. The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and in the district in which the subject property is situated;

2. The proposed use shall meet or exceed applicable performance standards;

3. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building, and site design;

4. The proposed use shall be in keeping with the goals and policies of the comprehensive plan;

5. All measures should be taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.

F. A performance bond shall be required by the hearing examiner for any elements of the proposed project which are deemed crucial to the protection of the public welfare. Such bond shall be in an amount equal to 150 percent of the cost of the installation or construction of the applicable improvements.

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J. 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.

See Appendix C- Regulatory Framework of this UPDATED Application for reference to the PCIP Application and materials submittal to the City of Snoqualmie on March 22, 2017, and the City's letter of Completeness and request for additional information, April 19, 2017. This UPDATED PCIP Application provides the requested additional information.

As noted in I. above, the proposed Request for Deviations to Standards is provided in Section V.

Section J required that the information now provided by the Applicant in Appendix C and Sections V and VII was to have been provided at the time of application. Instead, this information has been provided to the public and the FEIS Appellants just seven days before the first day of the public hearing. This information would have been useful to all of the affected agencies and commenters and should have been available for consideration in the DEIS and FEIS.

As discussed earlier, some of the Standards that are being proposed for deviation are not elgible for such deviations because they are "deemed necessary to protect health, safety or the environment", a mandatory test that is set forth in Section I.

Appendix C does not address the deviation issue.

Section V and Section VII do address these deviations and we have made additional comments there.

K. 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. (Ord. 1198 § 22 (Exh. D), 2017; Ord. 980 § 4, 2005; Ord. 933 § 2, 2003; Ord. 769 § 24, 1996; Ord. 744 § 2, 1995).

In accordance with SMC Chapter 17.50, the Snoqualmie Mill Planned Commercial/Industrial Plan application was formally submitted to the City of Snoqualmie on March 22, 2017. The City issued a Determination of Completeness on April 19, 2017 in accordance with SMC Sections 14.30.040 and 140.050. The Applicant understands the Snoqualmie Mill PCIP Application will be subject to the review process provided in City Code.

III. OVERALL PROJECT LOCATION AND BACKGROUND INFORMATION

Introduction of the Property

The Snoqualmie Mill project site is owned by Snoqualmie Mill Ventures, LLC (the "Owner" and "Applicant"). The project site is located within the City of Snoqualmie, King County, Washington. It is bounded by SE Mill Pond Road on the west, City limits and the City's wastewater treatment plant on the north, Borst Lake (Mill Pond) on the south, and King County ownership along 396th Avenue SE to the east. The site is located in Sections 29 and 30, Township 24, Range 8 East, W.M. in King County, Washington. Other distinguishing features for uses either adjacent to or nearby include the Snoqualmie River to the west and an existing gravel mining operation to the north. It is important to note that Borst Lake (aka Mill Pond) is not owned by the Applicant, nor is it included in the Snoqualmie Mill PCIP project site boundary. See Regional Vicinity Map Figure 1 and Vicinity Map Figure 2.

The Snoqualmie Mill PCIP, containing approximately 260.9 acres, is the last large undeveloped commercially and industrially zoned site available for development in King County. The site lies entirely within the Planned Commercial/Industrial (PCI) Zone of the Snoqualmie Zoning Code, SMC 17.20.050.

The Snoqualmie Mill PCIP property was annexed into the City of Snoqualmie on September 28, 2012, however, 15 acres located in the northeastern portion of the project site owned by the Applicant remains in King County jurisdiction. This area would require annexation into the City of Snoqualmie before any proposed development associated with the PCIP could occur on this portion of the site. This 15 acres should not be included in this application since it is not subject to the City's jurisdiction.

Background Information

A. Ownership Area

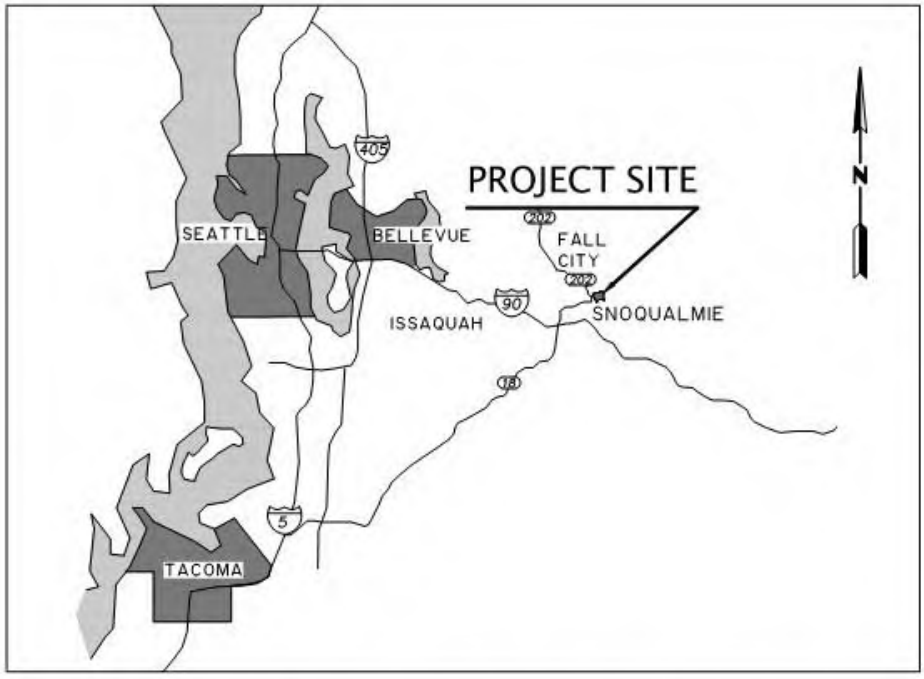
The Snoqualmie Mill PCIP contains the following tax parcels:

Parcel Area Table		
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**

*Parcel No. 2924089009 contains approx. 15.7 acres not annexed and lies within King County jurisdiction.
** Total area is from King County Assessor records. Actual surveyed site area totals 260.9 acres.

Regional Vicinity Map Figure 1

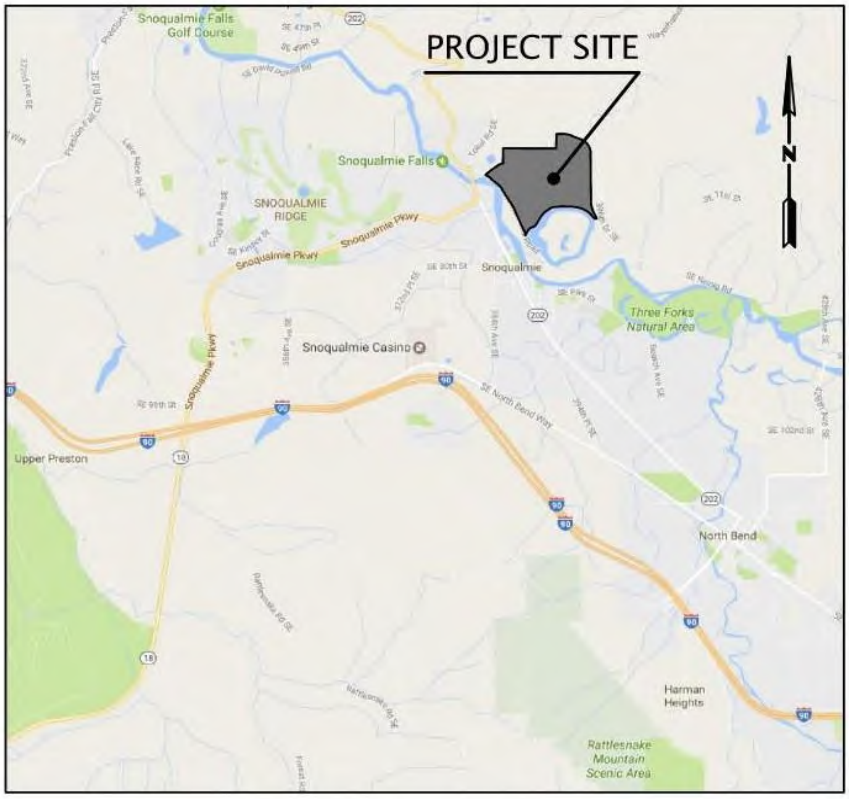


REGIONAL VICINITY MAP

N.T.S.

FIGURE 1

VICINITY MAP Figure 2



VICINITY MAP

FIGURE 2

B. Snoqualmie Mill PCIP – Future Lot Line Adjustment (LLA)

As identified above, the Snoqualmie Mill PCIP site is comprised of eight (8) remaining tax parcels. A Lot Line Adjustment (LLA) will be processed concurrently with the PCIP Application to create legal tax parcels/lots to align with the proposed Planning Areas 1, 2 and 3. The reconfigured legal tax parcels/lots will provide the basis for legal descriptions of future development phases and associated leases or ownerships to the end user(s).

C. Annexation Agreement

In 2011, a Pre-Annexation Agreement (PAA) was approved for the Snoqualmie Mill Planning Area. The Snoqualmie Mill Planning Area was annexed into the City of Snoqualmie on September 28, 2012.

An Annexation Implementation Plan (AIP) for the Snoqualmie Mill Planning Area was submitted to the City in accordance with the Pre-Annexation Agreement requirements and was approved by the City on November 28, 2016.

Development of the Snoqualmie Mill PCIP site is to be consistent with applicable requirements of the Pre-Annexation Agreement and AIP.

The Snoqualmie Mill PCIP Application UPDATE and Snoqualmie Mill PCI Plan Environmental Impact Statement (EIS) have been developed consistent with the Annexation Implementation Plan (AIP). The AIP separates the site into three (3) distinct districts. In the AIP, these were called Planning Areas 1, 2, and 3. The anticipated land uses within these planning areas are briefly described below and described in more detail in Section IV.

D. Annexation Implementation Plan (AIP) Consistency - Planning Areas 1, 2 and 3

As discussed above, the Snoqualmie Mill PCIP maintains the general planning areas depicted on the AIP but with refinement of the areas as it relates to

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critical areas preservation and open spaces.

The illustrative plans prepared by Miller Hull Partnership, LLP shown here and below reflect Planning Areas 1 through 3 and potential land uses for the site. The FEIS used this illustrative plan. The Appliant has provided more detail as described below, but this additional detail was not available or analyzed during the DEIS and FEIS process.

It should be noted that site development within these planning areas may not be sequential. Site development is fluid, based on market and economic demand for the type of development ultimately proposed. The FEIS is based on a phased approach and assumes sequential development. Here the Applicant is contradicting that assumption.

In general, the Snoqualmie Mill PCIP proposes a total of approximately 1.83 million gross square feet of light industrial/manufacturing, warehouse, office, retail, and residential uses. Development is anticipated to occur in multiple phases of development with the first phase beginning in the northwestern portion of the site abutting Mill Pond Road and the Haul Road, identified as Planning Area 1. This suggests that the Applicant is anticipating the possibility of development in all three Phases at the same time. If true, this approach would be inconsistent with the approach that was analyzed in the FEIS.

E. Individual Planning Area Summaries

Planning Areas 1, 2 and 3

As noted in the Executive Summary (Section I), the project details for the proposed project, including proposed Planning Areas 1, 2 and 3 have been refined from the initial Illustrative Master Plan as described in the Snoqualmie Mill PCI Plan EIS.

See PCIP Master Plan description in Section IV of this PCIP Application UPDATE.

F. Proposed Development Schedule, Ownership and Restrictive Covenants

The following project information addresses the anticipated development schedule, proposed ownership pattern, and restrictive covenants as required per the application requirements of *SMC 17.50.090(B)(3).*

3.a Program for development including staging or timing.

The Snoqualmie Mill PCIP will develop a total of approximately 1.83 million gross square feet of light industrial/manufacturing, warehouse, office, retail, and residential uses into three planning areas. As described in the Snoqualmie Mill PCIP EIS ("EIS"), development within the Snoqualmie Mill project is identified within three (3) Planning Areas. Development is anticipated to occur over approximately a 1015 year period. A buildout horizon year for Planning Area 1 was identified in the EIS. Planning Area 1 is anticipated to be completed as one infrastructure project, followed by multiple building permits.

The Snoqualmie Mill PCIP proposes phased development, with specific information provided for the first phase and more detailed design elements to be developed during later site development applications for subsequent phases. Each distinct planning area may contain one or more sub-phases. The exact timing of development will depend on economic and market conditions, and any requirements for completing major infrastructure improvements to accommodate planned land uses and levels of development activity.

3.b Proposed ownership pattern upon completion of project.

Development parcels/lots will owned by individual purchasers. A non-profit association of owners will be created to hold and maintain common open space, roads, utilities, and other infrastructure. The Applicant should provide these services until Build-out. Failure by a non-profit association could result in public nuisances and health, safety and environmental issues that would become a City obligation in the absence of a funded or bonded Applicant responsibility.

3.c Basic content of any restrictive covenants.

The applicant will develop covenants, conditions, and restrictions (CC&Rs) which will apply to all development parcels within the site. The CC&Rs will incorporate design guidelines and any development standards and conditions of approval adopted by the City. Proposed development plans will be reviewed, approved, and enforced by an Architectural Review Committee to ensure compliance with the CC&Rs.

The general range of topics addressed in the CC&R's will include 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).

3.d Provisions to assure permanence of maintenance of common open space through a homeowners association, or similar association... or other means acceptable to the City.

The applicant will create a non-profit property owners association which will be responsible for maintenance of dedicated open space, roads, utilities, and other site infrastructure.

IV. PROPOSED UPDATED PCI MASTER PLAN

A. Overall PCI Plan Description

In general, the Snoqualmie Mill PCIP proposes approximately 1.83 Million square feet of commercial, industrial and related land uses over a 10-to-15 -year period. Development is anticipated to occur in multiple phases. The PCIP proposes three separate development districts, identified as Planning Area "1", Planning Area "2", and Planning Area "3". Planning areas are based on existing site conditions, including the locations of environmental constraints, proximity to existing urban development and facilities. The sequencing and specific development program may vary based on market demand within the parameters analyzed in the Snoqualmie Mill PCI Plan EIS.

The planned development program is shown below. The Overall Snoqualmie Mill PCI Plan is shown on PCIP Plan Sheets SP-1 and SP-2.

PCI Plan - Planning Areas 1, 2 and 3

As discussed in Section 1, the PCI plan is divided into three (3) separate planning areas.

Planning Area 1

Planning Area 1 contains approximately 102 acres and is located in the northwest portion of the site. It is proposed to be comprised of a combination of warehouse/manufacturing, light industrial, upper story residential, and destination retail uses. This area is identified as the "Village" planned to feature a street walk of wineries, wine shops and other small retail spaces. There are no provisions in the Plan to ensure that this feature is actually built. The Village center will be aligned along an eastwest pedestrian-oriented corridor and main private drive known as Mill Street. This will be the primary gateway for the entire Snoqualmie Mill PCIP development, directing future visitors' views toward the existing Weyerhaeuser Planer Building located along the east portion of the site as depicted on the PCIP Site Plan Sheet SP-2.

The site plan for Snoqualmie Mill proposes an integrated trail system throughout the site. The trails will include passive and active recreation opportunities within open spaces, wetland and stream buffers and provide educational opportunities for visitors and future employees working at the site.

Planning Area 1 does not propose any alterations to wetlands or streams. However, some impacts to buffers would occur, along with buffer restoration and enhancement that would result in substantial improvement to buffer functions and wetland protection, as discussed in the Snoqualmie Mill PCI Plan EIS. Grading activities partly within wetland buffers would involve:

- Grading the existing "berms" along the north boundary of the site.

- Realignment of a "new" Mill Pond Road and development of a stormwater outfall to the Snoqualmie River,
- Over-excavating the "berms" and revegetating perimeter areas as well as other degraded wetland buffer areas as enhanced open spaces and compensating flood storage,
- Excavating and planting areas of open space for water quality treatment and conveyance to the river which would also serve as compensating flood storage, and
- Grading open space areas for the proposed trail system network.

These activities are poorly defined and conditioned. The FEIS hearing will document significant negative impacts to critical areas.

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An Overall Landscape Plan (PCIP Plan Sheet LS-1) depicts a conceptual rendering of Planning Area 1 detailing the developed areas, open spaces and trail alignments, streetscapes, parking, trails, stormwater plan elements, and the main entry roundabout to Snoqualmie Mill Planning Area 1. Sections and details of various plan elements such as; a Mill Street profile and cross sections through Planning Area 1 and the relationship of site fill to the FEMA Base Flood Elevation, as well as typical sections for trails and Mill Street are included on PCIP Plan Sheet SP-3. At this stage in the process, the Landscape Plan should provide more detail than a "conceptual rendering". These are far more significant features than indicated by the label "Overall Landscape Plan".

Planning Area 2

Planning Area 2 is approximately 56 acres in size and is located in the northeastern portion of the Snoqualmie Mill PCIP. There are approximately 15.7 acres lying outside of the City limit that are owned by the applicant but not included in the Snoqualmie Mill PCIP area due to their location outside the City. Albeit site planning for this area is at a programmatic level, it is anticipated that Planning Area 2 would consist of Warehouse/Manufacturing uses. Additional site analysis and planning will be required prior to development of this planning area.

Large scale industrial spaces / warehouses for a variety of light industrial uses with associated parking are envisioned in this northern planning area. The large blocks of industrial warehouse construction will accommodate light industrial production spaces, assuming homogeneous buildings spaced equally apart and docking areas between. The finished floor (FF) of the warehouses is assumed to be at or above the BFE, while the docking and parking areas are assumed to be approximately 4.0' lower in elevation.

The large central open space and constructed wetlands is anticipated in connection with development of Planning Areas 2 and/or 3 to serve as water quality treatment, wildlife connectors, compensating storage and mitigation for potential future wetland impacts, if proposed, for those future areas of development. This Planning Area is so generally defined that it is not possible to consider and apply specific development conditions. It appears that the Applicant wants to lock down and vest development regulations without providing enough specificity to allow for a reasonable review.

Planning Area 3

Planning Area 3, the Office/Campus District, is approximately 103 acres in size. It includes significant areas of the open space in the center and southeast portions of the site. It has the potential to be developed as a corporate or institutional campus, possibly by a single large user. Additional site analysis and planning will be required prior to development of this planning area. There is a vast difference between an institutional campus and a corporate office, yet the Applicant is seeking to vest specific development regulations and environmental mitigations without proposing a project. "Additional site analysis and planning" is no substitute for a rigorous public processs to review a specific project. If the Plan is approved, once a specific project is proposed, the City's discretionary authority and its SEPA options will be severely limited. And, the public will have no meaningful opportunity to weigh in as to the public benefit of what could be a vast variety and range of uses.

Development within Planning Area 3 is assumed to require enhanced stormwater treatment. Stormwater wetlands constructed in or near wetland buffers with discharges to targeted locations within the main wetland system would provide sufficient hydrology into the system.

It is anticipated that site development within Planning Area 3 may require significant transportation improvements. These improvements are further discussed in the Snoqualmie Mill PCI Plan EIS.

The PCIP Plan Sheet SP-4 and the Overall Landscape Plan (PCIP Plan Sheet LS-1) conceptually show the future pedestrian trail system extending into Planning Areas 2 and 3. The specific trail alignment will be determined as development plans are prepared for these planning areas.
This Planning Area is so generally defined that it is not possible to consider and apply specific development conditions. It appears that the Applicant wants to lock down and vest development regulations without providing enough specificity to allow for a reasonable review.

Discussion of Proposed uses - Gross Leasable Area The

following is an excerpt from the DEIS.

The table below identifies the mix and amounts of land uses by planning area. Proposed uses are consistent with the objective of developing an employment center and with the PCI zoning of the site. Quantities by category are considered approximate; development amounts could shift between categories, based on market conditions and the findings of the environmental analysis, When this document was submitted the FEIS was complete, thus the project could have been more defined. and subject to an overall maximum of 1.85 million square feet of gross leasable area. As described further below, building footprint area would be approximately 50,000 square feet greater than leasable area, reflecting common areas, utility space, etc.

*A distinction in the calculations in the EIS Table (**Exhibit 2.3-2) below** should be noted. For purposes of analysis, the EIS uses gross leasable area and/or gross building footprint area to estimate impacts for different elements of the environment. Building area shown for individual land uses in the top half of -1 is gross leasable area (gla); this calculation is used in the EIS to identify impacts that will be driven by the number of employees or residents occupying the space devoted to the various land use categories. For these elements of the environment, it is ultimately the number of users or workers renting or occupying the space that will generate impacts, and users are typically estimated based on leasable area. Examples include transportation, air quality, noise, parks, and public services. Acreage figures shown in the bottom half of -*

1are based on building footprint area, i.e., the amount of area that would be physically covered by buildings. The EIS uses footprint area to calculate impacts related to site coverage, stormwater runoff, earthwork and flooding impacts, wildlife habitat and open space, land use, building bulk and scale, visual impacts, fiscal impacts, etc.

Building footprint area is approximately 50,000 sf greater than gross leasable area for Planning Area 1; this difference equates to 8% of planned building space in Planning Area 1 and less than 3% of the PCI plan overall. The difference is a reflection of common areas, corridors, and space for utilities that has been identified in preliminary design for the mixed-use residential and retail buildings in Planning Area 1; the difference is specific to the residential and retail building types in Planning Area 1 and would not characterize planned development in Planning Areas 2 and 3. As noted previously, the calculations of area/acres in the Area Summary by Use table above is based on building footprints.

-1. Snoqualmie Mill Development Plan – Total Site (Gross Leasable Area/Gross Acres[1]) ***Exhibit 2.3-2***

	Planning Areas			
Land Use	1	2	3	**Site Totals [1]**
Warehouse/Manufacturing	280,000 sf	400,000 sf		680,000 sf [37%]
Light Industrial	120,000 sf			120,000 sf [7%]
Retail/Restaurant[2]	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 [11%]	9 acres	19 acres	39 acres [15%]
Open Space[4]	69 acres [68%]	34 acres	63acres	166 acres [64%]
Roads/Other Impervious[1]	22 acres [22%]	13 acres	21 acres	56 acres [22%]

[1] Includes roads, sidewalks, parking areas, plazas, etc.

Total Area [2]	102 acres	56 acres [6]	103 acres	261 acres

Notes:

[1]Numbers are rounded.

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

[3]Assumes 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 1- and 2-bedroom apartments.

[4]Total 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); 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.

B. Open Space and Critical Areas

One of the predominant requirements of the City's *Planned Commercial/Industrial District (PCI) Code- SMC 17.20.050.G* is the requirement to provide 35% of the site in Open Space. A fundamental concept of the PCI Plan is its open space, proposing approximately 165 acres ((64%) of the PCI Plan as total open space in various categories.

Site planning has carefully considered these opportunities and incorporated a network of open spaces that connect the large wetland in the northwest portion of the site, the central open space of the site, Borst Lake, and the Snoqualmie River. The central open space area provides a unique opportunity for constructed wetlands to serve as stormwater treatment as well as merging and enhancing existing degraded wetland buffer areas. The functions and value of constructed wetlands that are used as stormwater storage ponds are very different than natural wetlands. Constructed wetlands do not make up for degraded or altered wetlands and buffers. The FEIS hearing will document this.

Open space areas excavated for constructed wetlands, enhanced buffers and graded surface overflow to the Snoqualmie River would serve as compensatory storage for proposed fill to be placed within the floodplain. These excavated areas could also serve as mitigation areas for any wetland alteration that may be proposed and deemed to be beneficial to these resources.

[2] The total area of the development plan and Planning Area 2 include 15.7 acres that are located 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 Snoqualmie Mill PCI Area Summary by Use Table for master plan calculations without the unincorporated parcel. Source: Goldsmith 2018, 2020

Open spaces proposed within Snoqualmie Mill are described as three types:

- **Natural Open Spaces** – including sensitive area wetlands and streams, buffers, regraded and revegetated buffers,
- **Passive Open Spaces** – including stormwater treatment areas (stormwater wetlands), passive recreation grasslands, active and passive trails,
- **Active Landscape Open Spaces** – including landscape areas incorporated into the site design, soft surface public gathering areas.

The proposed development is a very low density relative to what could be considered as an ultimate capacity of the site. As such, upland developable land would be underutilized leaving extensive open spaces where, together with critical area wetlands and buffers, opportunities are created for:

- Habitat connections and wildlife corridors,
- Perimeter screening and landscape
- Active / Passive open spaces,
- Stormwater treatment and conveyance,
- Flood storage,
- Trails.

Natural open space, as discussed, consists primarily of critical areas and critical area buffers. Critical areas include on-site wetlands and streams and buffers. Also included are compensating buffer areas mitigating areas of buffer reductions and degraded areas of existing buffers that will be enhanced and revegetated. Therefore, all of the natural open space areas will be designated as critical area buffers containing restrictions of future uses consistent with NMC 19.12. However, as part of the PCI Master Plan and consistent with SMC 17.20.050.I, a deviation is requested from minimum buffer dimensions and maximum buffer reduction dimensions for buffer averaging. The description in the DEIS and FEIS and in Section VII of this updated application more than support such a deviation. The Plan does not demonstrate how it complies with SMC 19.12.090 (B)(3)-Buffer Averaging. This point is fully described in Section VII. Moreover, the Plan relies on its Consultant's report in the FEIS, but Appellants at hearing will document the inadequacy of the Applicant's submittals.

A summary of site areas, by use, and based on building footprint areas is shown on the following page. These areas include approximately 3.8 acres of existing impervious area and 11.9 acres of open space in Planning Area 2 which are outside of the City limit and outside of the current PCI Plan application.

Snoqualmie Mill PCI Area Summary by Use

	Planning Area 1	**Planning Area 2**	**Planning Area 3**	**Total**	***Total %***
	Mill Street	**Warehouse District**	**Campus District**	**Area**	***Site Area***
	(Ac.)	**(Ac.)**	**(Ac.)**	**(Ac.)**	
Development Area	**37.7**	**25.4**	**44.8**	**107.9**	***41%***

Building Area	**10.8**	**9.2**	**18.9**	**39.0**	***15%***
Retail (Incl: Tasting rooms/restaurants) (sf)	*80,000*		*25,000*		
Light Industrial (sf)	*110,000*				
Residential (sf)	*160 DU*				
Warehouse/Manufacturing (sf)	*282,000*	*400,000*			
Office/Campus (sf)	*0*		*800,000*		
Other Impervious Area	**22.3**	**13.1**	**21.0**	**56.4**	***22%***
Roads (sf)	*130,000*		*48,000*		
Parking, Plaza's Sidewalks, etc. (sf)	*842,000*	*569,600*	*868,500*		
Active Landscape Open Space	**4.6**	**3.1**	**4.8**	**12.5**	***5%***
Including Active Manicured Lawns, Ornamental Planting and Parking Landscape Islands					
Open Space	**64.4**	**30.7**	**57.8**	**152.9**	***59%***
Natural Open Space	***57.0***	***29.7***	***54.4***	***141.1***	***54%***
- Critical Areas & Buffers both Natural and Mitigated	*7.4*	*1.0*	*3.4*	*11.8*	*5%*
Passive Open Space *Including Open or Vegetated Open Space outside Critical Area Buffer including Trails & Stormwater Management*					
Total Snoqualmie Mill PCI	***102.1***	***56.1***	***102.6***	***260.8***	***100%***

Notes:

1 ***Upper Story - Included in Program Area - Not included in Building Area***

2 PA 1 Ratio of parking to Bldg Area = approx. 1.78:1. PA 2 parking esstimated at 80% - no retail or residential

3 PA 1 Ratio of Active Landscape to parking area = 0.24:1 used to estimate PA 2 and 3 landscape

4 Total Developed area = Building + Other Impervious + Landscape

5 Planning Area 3 parking estimted by PA 1 ratio to bldg area - subtracting 75% Bldg Area for under bldg parking

Open Space Grading Concept

The grading concept in the central open space is proposed to provide compensating flood storage for proposed fill in Planning Areas 2 and 3. The ultimate plan for mass grading includes more than simply demonstrating that equivalent compensating storage has been provided in the floodplain. The open

space grading is proposed in a manner to improve the path of floodwaters back to the river as the flood recedes.

Proposed grades for the future access to Planning Area 3 are such that low points are provided to allow flood waters to flow over the road whether a flood is rising or receding. Floodwater would enter the site from Borst Lake utilizing flood storage volumes on the site, then recede back over the road. However, in addition to receding back through Borst Lake, a drainage path / floodwater path is provided through the open space to the river discharge outfall to be constructed with Planning Area 1, as shown on PCIP Plan Sheets GR-1 and GR-2**.**

Normal flows from site runoff provide hydrology to the site wetlands and drain through Borst Lake, but once 10-year river stages, or above, are reached, the flood level exceeds elevation 418.0 and would inundate and utilize the open space flood storage and flow path for receding waters.

The project level grading proposed for Planning Area 1 will meet or exceed the requirements for compensating storage required by SMC 15.12 and SMC 19.12. Minor adjustments in the "Finished Grade" of future development permitting should not require new analysis provided that these approximate grades are achieved. Future developments cannot be exempted from specific analysis as required by SMC 15.12.060 (A) and (B) :

A. -No structure or land shall hereafter be constructed, located, extended, converted, or altered without full compliance with the terms of this chapter and other applicable regulations.

B. Permit Application. Application for a development permit shall be made on forms as prescribed by the floodplain administrator, and may include but not be limited to plans in duplicate drawn to scale, showing the nature, location, dimensions and elevations of the area for which application is made, and existing or proposed structures, fill, storage of materials, drainage facilities and their locations. The following information and documents shall be required:

C.
D. 1. The name and address of the applicant;
E.
F. 2. The name and address of the legal owner;
G.
H. 3. The legal description of the property;
I.
J. 4. The nature of the proposed action;
K.
L. 5. A statement as to the proposed use of any structure;
M.
N. 6. A statement as to whether the proposed action is temporary or permanent;
O.
P. 7. The elevation in relation to mean sea level of the lowest floor (including basement) of all structures;
Q.
R. 8. The elevation in relation to mean sea level to which any structure has been floodproofed;

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S.
T. 9. The certification of registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet the floodproofing criteria of this chapter;
U.
V. 10. A description of the extent to which a watercourse will be altered or relocated as a result of the proposed development;
W.
X. 11. Where development is proposed in a floodway, an engineering analysis indicating no net rise of the base flood elevation;
Y.
Z. 12. Any other information that may be reasonably required by the floodplain administrator in order to review the application; and
AA.
BB. 13. A floodplain habitat assessment and mitigation plan may be required unless the floodplain administrator makes and documents a determination of no adverse effect on any species listed under the Endangered Species Act. The habitat assessment and mitigation plan shall be prepared at the applicant's sole expense by a qualified consultant in accordance with the requirements of the Floodplain Habitat Assessment and Mitigation Draft Regional Guidance 2011 prepared by FEMA Region X, or any successor guidance document approved by FEMA for habitat assessment and mitigation. The city's actual costs of review of applicant's habitat assessment and mitigation plan shall be paid by the applicant.

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During future permitting of site grading and building, analysis of consistency with the provision of compensating storage will be provided. One concept would be the creation of a tracking matrix with the initial mass grade plan with Planning Area 1 which would be used throughout the project. The construction of a major new employment center and destination tourist district totally within the floodplain of a major river in 2022 fairly boggles the mind. It is almost as incredible as the fact that the project site is the second most polluted brownfield site in the State second only to Hanford, and is proposing massive grading and soil disturbance and the redirection of huge flood and stormwater flows.

The Plan offers only a speculative "one concept would be…"to address the monitoring of grading and consistency with the Plan.

C. Stormwater Management Plan

The following description of the Snoqualmie Mill Stormwater Management Plan is an excerpt from Chapter 6 of the Master Drainage Plan (April 2020), Appendix A to the DEIS. The complete Chapter 6 is provided in Appendix D of this PCI Plan application book appended hereto.

The primary regulatory framework for stormwater management for Snoqualmie Mill (notwithstanding flood regulations) is the 2016 King County Stormwater Management Manual, City of Snoqualmie Addendum to the 2016 King County Surface Water Design Manual; and the 2012/2014 Stormwater Manual for Western Washington (Dept. of Ecology) specifically, Appendix I-E criteria for direct

discharge exemption from flow control. These are referred to herein as *KCSWDM* and the *Ecology Manual*, respectively.

The site lies entirely within the Snoqualmie River Basin and currently drains to the Snoqualmie River from two (2) Threshold Discharge Areas. Drainage leaves the site at three (3) locations: directly to the river via overland flow, through Borst Lake (or the old Snoqualmie Mill Pond) via on-site ditches (Borst Lake drains over a manmade outlet weir and culvert under Mill Pond Road to the Snoqualmie River), and through the Northeast portion of the site that drains to the river via a large off-site wetland complex lying north of the property. The entire site (with the exception of some areas of the site above the Base Flood Elevation) as well as immediate downstream areas lie within the 100-year floodplain of the river.

The stormwater management strategy for development of Snoqualmie Mill is primarily flood control and compliance with Flood Hazard Regulations. But during normal rainfall, it is a combination of collection, treatment and direct discharge to the Snoqualmie River, and collection, treatment and discharge to onsite and off-site wetlands to maintain wetland hydrology. As discussed in the Regulatory Framework, the Snoqualmie River is designated as a *Direct Discharge Receiving Water Body* by the KCSWDM and the Ecology Manual, thus the site is exempt from flow control Core Requirement

#3. Post developed drainage to on-site and off-site wetlands will be evaluated by the wetland biologist for consistency with current conditions. This applies to all wetlands and drainages between the site and the Snoqualmie River.

Therefore, the Stormwater Management Plan for Snoqualmie Mill can be described in four (4) primary components:

1) Direct Discharge to the Snoqualmie River,
2) Maintenance of Wetland Hydrology,
3) Runoff Treatment of Pollutant Generating Impervious and Pervious Surfaces (**PGIS and PGPS**),
4) Flood Control and Compliance with Flood Hazard Regulations.

The exemption from flow control does not relieve the Applicant from compliance with the Clean Water Act and other water quality requirements. This issue is particularly important given the presence of toxic pollution on the site.

The Plan's proposed use of wetlands as drainage facilities does not comply with SMC 15.18.180 because the wetlands have not been approved as described in subsection (C) nor does the project qualify under subsections (A) or (B)

SMC 15.18.180:
Notwithstanding any other provision of this code, drainage facilities shall not be built within a natural vegetated buffer or wetland, provided:
A. Conveyance systems may be approved by the city when there is no feasible alternative;
B. Drainage facilities may be located in the outer 15 feet of a wetland buffer when required by engineering constraints, and when such discharges are designed to be infiltrated into appropriate soils or discharged as surface sheet flow in appropriate slope conditions, pursuant to SMC 19.12.170(H)(3); and
C. Drainage facilities may be allowed in wetlands approved for hydrologic modification and/or treatment in accordance with Guidesheet 1 in Appendix I-D of the Washington State

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Department of Ecology Stormwater Management Manual for Western Washington (2012, amended in 2014). (Ord. 1198 § 19 (Exh. B), 2017; Ord. 1081 § 2, 2011).

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Planning Area 1 Detail

Planning Area 1 will establish the initial grading of the site and is discussed in detail below under Flood Control and Compliance with Flood Hazard Regulations. Planning Area 1 grading and infrastructure development will include the initial relocation of Mill Pond Road for site entry, and the construction of a direct discharge outfall to the Snoqualmie River.

The outfall is proposed as a broad surface swale along portions of the realigned Mill Pond Road to provide surface flow to the OHWM of the river. Clean and/or treated runoff from the western portion of the site would be conveyed (through storm pipes) to the broad swale. The swale will be constructed to provide positive drainage to the river by excavating a portion of the existing (to be abandoned) Mill Pond Road a portion of which may be part of a King County maintained Revetment. Design of the channel and the banks of the swale will include necessary stabilizing rock, Rip-Rap and vegetation to prevent destabilization of the existing Mill Pond Road embankment over time and may require stabilization review by King County.

Runoff from the eastern portion of the site would be conveyed to the river through on-site and offsite wetlands to maintain wetland hydrology as required by the Direct Discharge criteria. This is described in detail under **Maintenance of Existing Flows for Wetland Hydrology Mitigation**, in subsection 2) in Appendix D. These wetlands are the existing conveyance paths for runoff from these site areas. The Plan would drastically change wetland hydrology, not maintain it as required by the Direct Discharge criteria. This issue will be documented during the FEIS hearing.

A preliminary engineering plan for grading and stormwater control for Planning Area 1 is depicted on PCIP Plan Sheet SD-1. Other depictions of the concept of fill for Planning Area 1 and compensating storage are shown on PCIP Plan Sheet GR-1. Figure 6-1 shows the concept for collection and conveyance of runoff, treatment areas and treatment types and discharge locations. It includes the location, based on preliminary design, of an outfall to the Snoqualmie River for direct discharge stormwater and for improved control of receding floodwater. A detailed Snoqualmie River Outfall Concept is shown on PCIP Plan Sheet LS-1.

Future design and permitting will provide actual analysis and appropriate sizing of storm conveyance facilities. It is nice to see that "actual analysis" will be done eventually. However, sufficient project level details are available now to allow consideration of this issue in the FEIS. Design details should be developed at this time so that future mitigation options are not foreclosed.However, preliminary estimates of the direct discharge flows are contained in DEIS Appendix A (MDP) the analysis Appendix B-5 to Chapter 8 for future assistance in sizing of basic treatment facilities for Planning Area 1 shown on PCIP Plan Sheet SD-1.

Site Grading and Compensating Storage

Proposed site grading at Snoqualmie Mill includes filling portions of the site within the floodplain, including raising some site areas and building pads above the BFE, and excavating compensating storage. To analyze compensating storage for the overall site, and to recognize the different levels of planning that has occurred for the site's 3 planning areas, different assumptions were required for Planning Areas 2 and 3 vs Planning Area 1, where more project specific detail is known.

From the monitoring and evaluations of groundwater provided in Chapter 4, it is assumed that for the vast majority of the site, the lowest elevation that can be considered as compensating storage during a flood is elevation 418.0. The exception to this is near the river, south and west of Planning Area 1. Proximate to the river, the seasonal high groundwater has been shown to be no higher than 412.0.

Flood storage is assumed as available storage volume, therefore, between the BFE elevation and elevation 418.0 for most of the site, and 412.0 near the river. Compensating storage is provided if analysis of equal available flood storage will exist when considering proposed grades with storage lost (due to fill) or storage gained (due to excavation) between elevation 418.0 (or 412.0 near the river) and the BFE.

Planning Area 1 Detailed Grading Concept

Planning Area 1 proposes to contain a mix of commercial/retail, light industrial, warehouse and second story residential development. Planning for this mixed commercial/retail is geared predominantly to wineries, wine making, tasting sales and hospitality. The area would be bisected by **"Mill Street"** with retail/restaurant associated with the street front, and production occurring behind the retail, in light industrial portions of the buildings.

For purposes of calculating flood storage across the site, digital terrain model (DTM) surfaces have been created for:

1) The current topography of the site,
2) The proposed grading plan for Planning Area 1,
3) The proposed grading plan including the Planning Area 2 and 3 grading concepts (described below),
4) The floodplain water surface utilizing the BFE elevations from FEMA cross sections proximate to the site.

A grading plan for Planning Area 1 is shown on PCIP Plan Sheet GR-2. Various Planning Area 1 crosssections are shown on PCIP Plan Sheet SP-3 and are provided to facilitate grading analysis for compensating storage. The plan is assumed to be a rough grade plan representing maximum displacement from fill and is not a detailed plan of pavement grades, curbs and storm drainage low points.

The proposed grading would raise the main central portion of Mill Street above the Base Flood Elevation (BFE). It also proposes to raise grades for all finished floors (FF) of buildings to be at least 1.0' above the BFE. Currently, building finished floors are proposed to be elevation 426.0. Access areas to loading docks of buildings are proposed to be 4.0' lower than the FF at elevation 422.0. Grades of parking areas and drive aisles would range from 420.0 to 424.0.

Compensating storage for areas filled would be accomplished by excavating below current grade, primarily:

- 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 to restore the Wetland 12 buffer with uniform drainage and vegetation,
- The construction of stormwater wetlands for stormwater treatment.

The Plan's proposed use of wetlands as drainage facilities does not comply with SMC 15.18.180 because the wetlands have not been approved as described in subsection (C) nor does the project qualify under subsections (A) or (B)

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Planning Areas 2 and 3 Grading Concept

Planning Area 2 is proposed to contain light industrial warehouse uses. The assumption is that the finished floor (FF) of the warehouses would be at or above the BFE. Finished floor has been assumed to be elevation 426.0. Docking and parking areas have been assumed to be 4.0' lower at elevation 422.0. However, Planning Area 2 does not have a preliminary site plan at this time. Therefore, an approximate development area, assuming homogeneous buildings equally spaced apart, with docking areas between, is shown on the Mass Grade Concept (PCIP Plan Sheet GR-1) in Appendix D to be filled to elevation 424.0. All other potential development of Planning Area 2 for access and parking, is assumed to be filled to elevation 422.0. This approximates the amount of flood storage displacement that would occur with a future buildout of Planning Area 2 regardless of building layout or specific plan.

Planning Area 3 southern area is assumed to be developed as a corporate or institutional campus. Planning Area 3 has no preliminary site plan at this time. It is assumed that buildings would be raised above the BFE and provided with one level of ground level/below building parking. It is unknown at this time whether any restrictions will be placed on excavation in Planning Area 3 for environmental reasons, therefore, it has **not** been assumed that a parking level can be lowered to elevation 418.0 to maximize compensating storage. Therefore, most of this development area has been assumed to remain at its existing ground elevation of approximately 420.0. The northern area of Planning Area 3

is assumed to remain above the BFE. This provides a conservative estimate of potential flood storage displacement for Planning Area 3 to be compensated.

Compensating storage for Planning Areas 2 and 3 would be accomplished by excavating for future stormwater wetlands for runoff treatment similar to Planning Area 1, and the Open Space Grading Concept discussed below.
The Plan's proposed use of wetlands as drainage facilities does not comply with SMC 15.18.180 because the wetlands have not been approved as described in subsection (C) nor does the project qualify under subsections (A) or (B)

A Mass Grade Concept including Planning Areas 2 and 3, and Open Space is shown on PCIP Plan Sheets GR-1 and GR-2.

The floodplain water surface was overlaid with each of the three topographic surfaces to analyze the intervening volume to derive a volume of flood storage over the site for each topographic condition. The results of this analysis of floodplain storage are provided in the Table below. The existing Floodplain and Developed Floodplain for Planning Area 1 is shown on PCIP Plan Sheets GR-2. While the floodplain surface over the site for the existing and developed condition of the site, and the location and elevations of the FEMA cross-sections used for this analysis is shown on PCIP Plan Sheets GR-1.

Snoqualmie Mill

Floodplain Compensating Storage Analysis

	Flood		Storage	Increase
Current Site Conditions				
Below Base Flood (BFE) or (Decrease)				
Current *(Existing)*	**931.3**	**Ac-Ft**		
Planning Area 1 Mass Grade	**1016.8**	**Ac-Ft**	**85.5**	**Ac-Ft**
Total Site Mass Grade[1]	**946.0**	**Ac-Ft**	**14.7**	**Ac-Ft**

1. The Floodplain storage shown on the Full Development Mass Grading Concept Plan and the Floodplain Inundation Exhibit assumes that Planning Area 3 be provided with below building parking in lieu of "fill" above the BFE.

D. Utilities

Snoqualmie Mill is currently within the service area of the City of Snoqualmie for water and sanitary sewer. The City of Snoqualmie currently serves the Snoqualmie Mill Site with domestic water and sanitary sewer service, and will continue to serve the pre-existing, legal non-conforming uses. As stated in the Annexation Implementation Plan (AIP), future development or redevelopment of the site will be predicated upon adequate capacity to serve proposed uses at the time of formal Site Development application.

Below are evaluations of the City's capacity to serve Snoqualmie Mill with water and sewer based on the City's utility system plans in place at the time of the application and preparation of the DEIS. These include the **Water System Plan** (Gray & Osborn 2013), and the **General Sewer/Wastewater Facility Plan** (Gray & Osborn 2012). These are followed by discussions and understandings of the current efforts to update these system plans which are on-going. These discussions are based on the City's review comments of the Snoqualmie Mill DEIS and clarifications made thereafter.

1. Water System

The City completed an update to its Water System Plan (WSP) in 2013. The WSP evaluates the current City domestic water system capacity and the capacity to serve the projected growth for 20 years (i.e., approximate Year 2032) for the City and its service area, which includes the Mill Planning Area.

Summary of System and WSP (2013):

Per the 2013 WSP, the projected system demand based on anticipated growth is as follows:

	2010 Baseline	2032 Projected	Buildout
Average Daily Demand (ADD)	1,173,817 gpd	1,908,729 gpd	2,350,371 gpd
Number of ERUs	4,722 ERU	7,589 ERU	9,550 ERU

The WSP cites both a 2032 projection and a buildout projection. The 2032 projection specifically excludes projected demand from both the Mill Planning Area and the Snoqualmie Hills West area. The additional growth assumed to reach the buildout scenario anticipates approximately 945 residential dwelling units and 190 acres of commercial development resulting in approximately 1,300 new employees, beyond what is included in the 2032 plan projections.

The evaluation of available system capacity in the WSP is summarized as follows:

	Available	2018 Demand	2032 Demand
Storage Capacity	4,413,750 MG	1,709,364 MG	2,278,664 MG
Treatment Capacity	2,993 gpm	3,048 gpm	3,218 gpm
Annual Water Right	2,172 ac-ft/yr	1,998 ac-ft/yr	2,110 ac-ft/yr
Instantaneous Water Right	3,148 gpm	3,048 gpm	3,218 gpm

As shown, there is more than ample storage capacity for the City's projected demand as well as the projected buildout scenario. Although the WSP separates the Canyon Springs area from the Snoqualmie Ridge area and concludes that there is inadequate storage capacity within Canyon Springs, the WSP cites in the system description:

> *"The two areas are connected by an intertie . . . The two areas used to operate fairly independently of each other, but with continued growth and demand requirement in both areas, the system is operated more holistically." (Ref. 2013 WSP pg. 1-4)*

As shown above, there is insufficient instantaneous water rights and treatment capacity for the projected 2032 growth. This admission of lack of capacity is even more significant given that the Applicant's analysis is based on a Water System Plan that is 9 years old. WAC 246-293-280 requires WSP updates every 5 years at a minimum.

The Project Application should not be approved until an updated plan determines adequate water supply and treatment capacity.

The analysis that follows is no substitute for a fully adopted and updated Water System Plan. The Applicant's analysis is mostly focused on its own project needs and gives scant attention to the needs of other developments under consideration or existing customers who are experiencing water capacity restraints.

The review of a Master Plan application is not the appropriate venue to make important long term decisions regarding the City's water rights, consumption, conservation, conveyance and storage. That's what the Water System Plan is designed to do. Moreover, the added analysis and review by the Department of Ecology adds another layer of protection and certainty for the public.

Other residents, businesses and property owners are entitled to have their needs for water considered in a publicly processed Water System Plan with hearings and Council approval. Without that, approval of this Plan would allocate an already over-subscribed resource to one property owner with no consideration of the rights of other water customers.

It should be noted that for most other design issues the Applicant has provided only conceptual preliminary plans and assumes future analysis and review after the Plan and FEIS is approved. In this case, however, the Applicant provides ample details to predict water usage.

According to the WSP, the City is taking measures to develop well claim sources and redevelop decommissioned wells, which would prolong the need for additional water rights or source capacity to beyond the 20-year plan. This would indicate that with these measures taken, the water system is adequate to serve the projected demands in the WSP.

2015 Water System Capacity Analysis Update for the Mill Planning Area

The 2013 Water System Plan evaluated the water system demands at a 2010 base year with "projected" growth together with committed service by contract or agreement to Snoqualmie Ridge and Snoqualmie Ridge II, and a reserve for service to the Lake Alice Community Association, pending a need through monitoring. Between 2010 and 2015, the City has experienced actual growth and has entered into additional commitments for service to Kimball Creek Development, the Salish Lodge Expansion, and the Mt. Si High School Renovation project.

Gray & Osborne, Inc., Consulting Engineers to the City of Snoqualmie, prepared a Technical Memorandum dated June 2, 2016 (Revision 1 dated June 27, 2016) that provides an updated capacity analysis of the City's water system in order to determine how much excess capacity currently exists beyond current uses and current commitments. The conclusion states:

The City has adequate annual water rights to provide all allocated water. However, the City currently lacks developed instantaneous water rights and source capacity to serve all customers to whom water has already been allocated. If the two groundwater claims are considered, the City has adequate instantaneous water rights to serve the allocated water and approximately 290 additional ERUs.

The City's capacity to serve additional connections could be increased by the following measures:

- *If the City uses the two groundwater right claims and fully develops sources for those rights, the City could serve 290 ERUs in addition to existing demands and the demands already allocated for current development.*
- *If the City were to curtail the augmentation of potable water to Eagle Lake and the reclaimed Class A irrigation systems, the City could regain up to approximately 315 ERUs of maximum day demand (corresponding to instantaneous withdrawal, Qi).*
- *The construction of a backwash decant and recycle facility at the North Wellfield will allow the City to more efficiently use the existing water rights by decreasing the amount of wasted backwash water. If the backwash recycle system is able to recycle at least 50 percent of the backwash, the City could regain up to approximately 285 ERUs of maximum day demand (corresponding to instantaneous withdrawal, Qi).*

According to the Technical Memorandum, the City has over-committed, or has over-allocated water service to planned development projects by approximately 152 ERUs over developed source capacity and, therefore, must implement one or more of the recommended measures to increase available capacity. The least of these being developing source capacity up to the maximum groundwater right claims providing approximately 290 ERUs of excess capacity in the system.

Anticipated results from implementing the recommended measures:

Groundwater Right Claims	+290 ERUs
Eagle Lake (Reclaimed Class A Irrigation)	+315 ERUs
Recycle Backwash Water	+285 ERUs

Total Anticipated Increase in Capacity +890 ERUs

Implementation of the recommended measures, therefore, could potentially yield approximately 890 ERUs of excess capacity within the system for development within the Mill Planning Area or other growth areas within the City before additional water rights would become necessary for additional service.

City of Snoqualmie Capital Facilities Plan

Although the 2013 water system plan was the City's most recent plan at the time of the 2017 Snoqualmie Mill PCIP Application, the City's 2017 – 2022 Capital Facilities Plan indicates that the completion of the Water Reclamation and Wastewater Treatment Facility Improvement project is scheduled to occur between 2017 and 2018. By 2017, the City had issued public works contracts for Phase 2 of the project and appears to be on schedule.

Currently, the backwash water facility has been completed, and all new water rights claims have been granted to the City ***(Ecology Report of Examination for Water Right Change CG1-20316C, CG1-00059S and CG100060S issued December 2018).*** In addition, the City has completed a 2021 Draft Water System Plan which addresses the Snoqualmie Mill site as well as the entire 2011 annexation area within the service area and system planning. See further discussion of the 2021 Draft Water System plan below under the heading 2021 Draft Water System Plan Update.

Anticipated Demand for Snoqualmie Mill

The following discussion provides two estimates of water demand based on varying methodologies and assumptions about land uses and employment. The first estimate is derived from the methodology used in the adopted Comprehensive Plan (2014) and the 2013 WSP. It was prepared prior to submittal of the Snoqualmie Mill PCIP Application, and without specific knowledge of the proposed mix and amount of various land uses. It assumes generalized and hypothetical commercial/industrial land uses and estimates employment based on an average of employees per acre to calculate ERUs and demand.

The second methodology is more project-specific and is based on information in the PCIP Application. It is based on the types and amounts of commercial and industrial land uses anticipated to locate in the project and estimates of the number of employees per 1,000 square feet of developed area for each use to estimate water demand. The estimate also addresses the specific demands of winery production, which is anticipated to be a primary use in Planning Area 1.

An early evaluation was made in the Annexation Implementation Plan (AIP) for the Snoqualmie Mill property relating the size and uses anticipated for the property in relation to the estimated demand for similar uses within Snoqualmie Ridge contained in the WSP. The AIP estimated the ADD for non-residential development at Snoqualmie Ridge to be approximately 5.5 ERU/Ac. The total ERU estimated for Snoqualmie Mill using that assumption and the total developed area would yield approximately 594 ERU.

The following table shows an estimate of total demand similar to what was included in the initial Snoqualmie Mill PCIP Application (March 2017) utilizing the Comprehensive Plan generalized calculations of employees per acre. This resulted in a total demand estimate of approximately, 698 ERU and a Planning Area 1 demand of approx. 267 ERU. The MDP (Appendix A to the DEIS) has updated the evaluation of water demand using the current land use program assumptions, includes winery production estimates, and provides an analysis of Planning Area 1 detail. This has resulted in a project demand of approx. 799 ERU and a Planning Area 1 demand of approximately 239 ERU.

Snoqualmie Mill Water Usage Estimate

Residential ***Total***

				ERU		
		Bldg Area (sf)	Num of Units	Est. ERU's	ADD (gpd)	
P.A 1		N/A	160	112	22 ,400	***112***
Light Industrial / Retail						
	Gross Area	Bldg Area (sf)	Estimated		ADD (gpd)	
	(Ac)	L.I. Retail	Employees			
P.A 1	26	120,000 70,000	237		20,100	***101***
P.A 2 - 3	5	0 25 ,000	42		3 ,750	***19***
Industrial Warehouse						
	Gross Area	Bldg Area (sf)	Estimated		ADD (gpd)	
	(Ac)		Employees			
P.A 1	12	280,000	280		10,860	***54***
P.A 2 - 3	25	400,000	400		17 ,000	***85***
Business Park Ca	**ıpus** Gross Area	Bldg Area (sf)	Estimated		ADD (gpd)	
	(Ac)		Employees			
P.A 2 - 3	40	800,000	1 ,600		65 ,440	***327***
P.A 1 Total	38	470,000	517		53,360	***267***
P.A 2 - 3 Total	70	1,225,000	2,042		86,190	***431***
Total	***108***	***1 ,695,000***	***2 ,559***		***139,550***	***698***

Assumptions:

Residential		
ERU's per Apt. Unit	0.7	
ADD (gpd per ERU)	200	2013 Snoqualmie Chapt. 2 (Gray & Osborn, Inc. Update Memorandum; June 27, 2016)
Water Use per Employee (gpd)	30	2013 Snoqualmie WSP
Light Industrial / Retail		
Light Industrial / Retail (gpd/Ac)	500	2013 Snoqualmie WSP for Commercial 1,000 gpd per acre) - applied to 50% Dev't Area

Light Industrial / Employee (sf)	1000	Per Snoqualmie 2032 - Snoqualmie Comprehensive Plan Element 7 Land use.
Retail / Restaurant / Employee (sf)	600	Per Snoqualmie 2032 - Snoqualmie Comprehensive Plan Element 7 Land use.
Business Park Campus		
Business Park Campus	436	2013 Snoqualmie WSP for Business Park
Business Park Campus / Employee (sf)	500	Per Snoqualmie 2032 - Snoqualmie Comprehensive Plan Element 7 Land use.
Industrial Warehouse		
Industrial (gpd/Ac)	200	2013 Snoqualmie WSP for Commercial (1,000 gpd per acre) - applied to 20% Dev't Area
Industrial / Employee	1000	Per Snoqualmie 2032 - Snoqualmie Comprehensive Plan Element 7 Land use.

Planning Area I Detail

Through the process of preparing the Snoqualmie Mill DEIS and specifically Appendix A (MDP), a greater level of detail is known about the development that is planned to occur within Planning Area 1. The development concept as a wine village requires that estimates of water demand include an estimate of wine production and unique water demand for that production. Also, the project program for the EIS includes specific estimates of employment that should be used to estimate demand as opposed to the Comprehensive Plan methods discussed above.

Winery Water Demand Estimate:

The Department of Ecology as part of their *draft* **Winery General Permit** has performed a great deal of research in recent years regarding water demand and the volumes and concentrations of wastewater from the production of wine in the State of Washington. Summaries of this research can be found in the **FACT SHEET for the Formal Winery General Permit** *(Formal Draft released on November 1, 2017)*.

The anticipated water demand from an estimated number and size range of wineries expected as part of the Snoqualmie Mill Planning Area 1 is shown below.

Snoqualmie Mill

Estimated Winemaking Water Demand

Range of Wineries anticipated at Snoqualmie Mill

(This is an estimated number and size for purposes of anticipated water demand. It is an estimate for EIS purposes only)

	No. of Wineries	Cases of Wine per Year	Volume of Wine[1] (gal)	Water Demand[2]	Daily Demand Sept. - Nov. (gpd)	ADD (gpd)
2,000Cases per Year	4	8,000	19,040	114,240	1,269	313
3,500Cases per Year	5	17,500	41,650	249,900	2,777	685
6,000Cases per Year	2	12,000	28,560	171,360	1,904	469

10,000 Cases per Year	1	10,000	23,800	142,800	1,587	391
Totals	**12**	**47,500**	**113,050**	**678,300**	**7,537**	**1,858**

Notes:

1 2.38 gal of wine per case of wine
2 6 gal water demand per gal of wine - Per Ecology research under Winery General Permit
3 4 gal wastewater per gal of wine - Per Ecology research under Winery General Permit
4 Water Demand and Wastewater Flow (Sept. - Nov.) = total volume / 90 days
5 ADD Water Demand = total volume / 365 days

From this information and based on the project program specific estimates of employment, the Snoqualmie Mill Water Usage Estimate table is revised as shown below to represent a more realistic water demand for the project accounting for these employment levels and Winery production within Planning Area 1. See revised table below.

Snoqualmie Mill Water Usage Estimate

(Employee estimates per Snoqualmie Mill Land Use Program and Winery Demand Estimate)

							(gpd)	***ERU***
P.A 1		N/A		160	112		22 ,400	***112***
Light Industrial / Retail								
	Gross Area (Ac)	Bldg Area (sf) L.I.	Retail	Estimated **Retail** Employees	L.I Winery ADD (gpd)	Gross Area / Retail ADD (gpd)	Total ADD (gpd)	
P.A 1	26	120,000	70,000	140	1,858	17,200	19,058	***95***
P.A. 2 - 3	5	0	25 ,000	40		3 ,700	3 ,700	***19***
Industrial Warehouse								
	Gross Area (Ac)	Bldg Area (sf)		Estimated Employees			Total ADD (gpd)	
P.A 1	12	280,000		130			6,360	***32***
P.A 2 - 3	25	400,000		190			10 ,700	***54***
Business Park Campus								
	Gross Area (Ac)	Bldg Area (sf)		Estimated Employees			Total ADD (gpd)	

P.A 2 - 3	40	800,000	2 ,670	97 ,540	***488***
P.A 1 Total	38	470,000	270	45,960	***239***
P.A 2 - 3 Total	70	1,225,000	2,900	111,940	***560***
Total	***108***	***1 ,695,000***	***3 ,170***	***157,900***	***799***

Assumptions:	t	
Residential		
ERU's per Apt. Uni	0.7	
ADD (gpd per ERU)	200	2013 Snoqualmie Chapt. 2 (Gray & Osborn, Inc. Update Memorandum; June 27 , 2016)
Commercial		2013 Snoqualmie
Water Use per Employee (gpd)	30	WSP
Light Industrial / Retail		
Retail / Restaurant (gpd/Ac)	500	2013 Snoqualmie WSP for Commercial 1,000 gpd per acre) - applied to 50% Dev't Area
Light Industrial Winery Water Use	678,300	Gal of water (based on 6 gal of water/gal of wine and 2.38 gal of wine/case of wine produced - September through November ***See Estimated Winemaking Water Demand Table***

Residential	Bldg Area (sf)	Num of Units	Est. ERU's	ADD	***Total***

Retail / Restaurant / Employee (sf) Business Park Campus 436 Per Snoqualmie Mill Land Use Program and EIS

Business Park Campus

2013 Snoqualmie WSP for Business Park

Business Park Campus / Employee (sf) 2013 Snoqualmie WSP for Commercial (1,000 gpd per acre) - applied to 20%

Industrial Warehouse Industrial (gpd/Ac) 200 Per Snoqualmie Mill Land Use Program and EIS

	Dev't Area
Industrial / Employee	Per Snoqualmie Mill Land Use Program and EIS

As shown by the table above, the total estimated water demand for full build out of Snoqualmie Mill is 799 ERU as opposed to the 699 ERU estimated in the initial PCI application (utilizing Comprehensive Plan methods for estimating demand). However, this increase is not due to the anticipated demand associated with wineries and wine production. Rather, it is due primarily to the methodology for estimating employment (i.e., employees per square foot of building area per land use category.

The current estimated demand from Planning Area 1, including estimated wine production demand, is believed to be closer to the prior estimate; as shown on the above table, demand is estimated to be 239 ERU as opposed to the original PCI estimates of 268 ERU. This estimate is on an annual basis. Wine production involves a significant increase in short term demand during the processing months, approximately September through November.

2021 Draft Water System Plan Update

At the time of this Application Update, the City has completed a Draft 2021 Water System Plan (WSP) for Agency review. This WSP fully includes the Snoqualmie Mill site as well as the entire 2012 annexation area in the Sewer Service Area and evaluations of projected growth.

The 2021 Draft WSP base year (2017) includes system improvements that have been completed since the 2013 system plan, such as:

- Completed capital facilities as discussed in the above evaluation of the 2013 Plan,
- Expanded Source and Supply from the recently granted water rights claims ***(Ecology Report of Examination for Water Right Change CG1-20316C, CG1-00059S and CG100060S issued December 2018).***

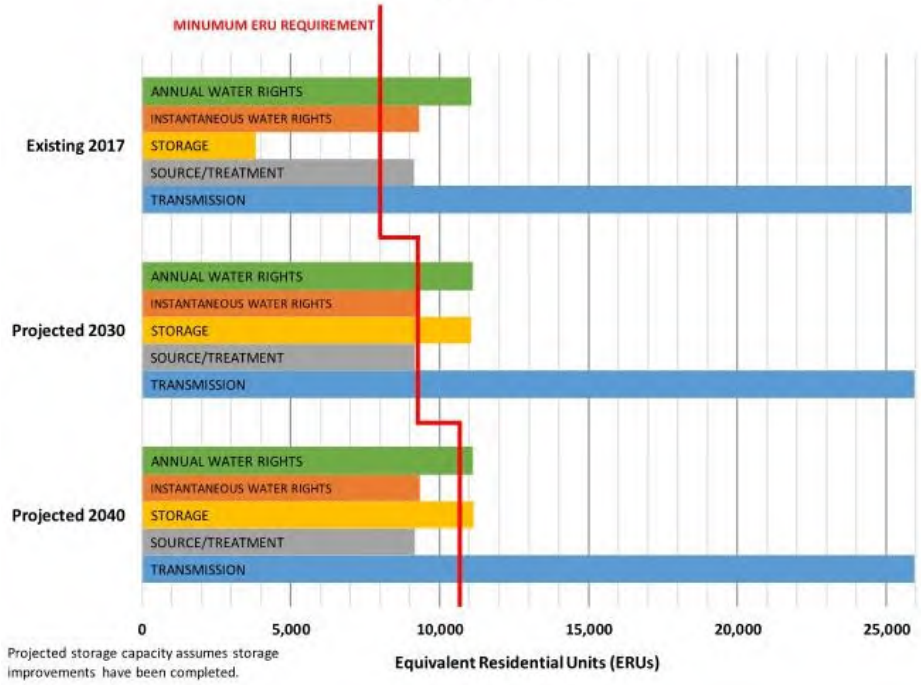
The Draft WSP evaluates existing and project system capacity for the base year (2017) and projected 2030 and projected 2040. The projected capacity includes improvements discussed above and additionally includes Capital Facility improvements in the plan for the 10-year planning period. These include **CIP F12 – 1.6 MG reservoir** in the 599 zone.

The capacity is represented in the WSP as follows:

	2017	2030	2040
Maximum System Capacity			
Maximum System Capacity (ERUs)	**3,819**	**9,164**	**9,164**
Limiting Facility	**Storage**	**Source and Treatment**	**Source and Treatment**
Unused Available System Capacity			
Maximum System Capacity (ERUs)	3,819	9,164	9,164
Projected ERUs	8,027	9,279	10,673
Unused Available System Capacity (ERUs)	**-4,208**	**-115**	**-1,508**

1 = Includes distribution system leakage.
2 = Projected storage capacity assumes storage improvements have been completed.

Chart 7-2
System Capacity Analysis



Projected storage capacity assumes storage improvements have been completed.

The 2021 Draft system plan addresses the system capacity as it relates to projected growth identified in the Comprehensive Plan. It acknowledges that Snoqualmie Mill is zoned Planned Commercial/Industrial (PCI) District and development of the PCI district is a part of the projected growth of the City.

Based on the direction of the City's water system plan update, as communicated by the City to the PCI Plan engineering consultant (RH2 Engineering, August 22, 2019 letter to City of Snoqualmie

Wastewater Superintendent; and meeting with City staff and engineering consultants on October 10, 2019), the initial PCI Plan water system proposal is described as follows.

- To serve Snoqualmie Mill Planning Area 1, primary water supply to the site will be provided directly from the City's 599 Zone. This would be accomplished by installing a water main extended south along SE Mill Pond Road, along existing haul roads or along other alignments in order to connect to the City's existing 599 Zone water main near the intersection of Meadowbrook Way SE and SE Reining Road.

  New 599 Zone water main may be extended north along Railroad Avenue from Snoqualmie Parkway, crossing the Snoqualmie River (either on the State Route (SR) 202 bridge or under the river) to the Tokul Roundabout, then heading southeast on SE Mill Pond Road to the site.

- A proposed pressure reducing valve from the 705 Zone water main in SE Mill Pond Road near the Water Reclamation Facility may be installed to provide redundancy and backup water supply for Planning Area 1.

- To serve Snoqualmie Mill Planning Areas 2 and 3, a new 599 Zone water main may be extended north along Railroad Avenue from Snoqualmie Parkway, crossing the Snoqualmie River (either on the State Route (SR) 202 bridge or under the river) to the Tokul Roundabout, then heading southeast on SE Mill Pond Road to the site, or bored directly from Mill Pond Road to Snoqualmie Parkway.

- All proposed water mains will be sized by hydraulic analyses, and the conceptual water plan will be confirmed in the City's water model once more detailed information on the proposed development plan becomes available, but general sizes are shown in the 2021 Draft WSP.

- The development of Planning Area 2 and 3 may necessitate additional storage to support normal operational demands. As such, a new water storage facility may be required on or adjacent to the site to serve this extension of the 599 Zone under the Snoqualmie Mill Planning Areas 2 and 3 scenario. Although there is excess storage in the Snoqualmie Ridge area that may be transferred to the site under an emergency condition, there are storage limitations in the 599 Zone which affect the ability of the zone to fully support the Mill site under normal conditions. The water storage needs will be reviewed during the 2021 WSP Update and as more detailed information on the proposed development plan becomes available.

- The water plan for Snoqualmie Mill will conform to the system plan in effect or direction provided by the City at the time of project approval. This statement does not resolve the inappriateness of approving this Plan without an updated Water System Plan and a determination from the City's utility that adequate water will be available.

2. Sanitary Sewer System

The March 2017 Snoqualmie Mill PCIP Application provided a summary of the City's General Sewer/Wastewater Facilities Plan (WWP) from 2012 and concluded that there is likely residual capacity within the wastewater treatment plant beyond the anticipated 2032 "Buildout" of perhaps as much as 1500 ERU of development. Excerpts from that summary are included in the discussion below.

With this PCI Application Update, it is anticipated that the City will review the current actual growth and facility loading consistent with the 2021 Draft General Sewer Plan as it relates to the Snoqualmie Mill PCI plan buildout, and Snoqualmie Mill Phase I.

Summary of System (As described in the City's 2012 GSP)

At the time of application in 2017 the current General Sewer/Wastewater Facilities Plan (WWP) was the 2012 WWP by Gray and Osborn. The WWP evaluated the City sewer system and Wastewater Treatment Plant (WWTP) capacity and the capacity to serve the projected growth in the City for 20 years (i.e., approximate Year 2032) for the City and its service area. This included current service for the existing pump station within the Mill Planning Area and the current use (DirtFish), however, did not include Snoqualmie Mill, or growth within the Mill Planning Area in projected wastewater flows in the 2012 WWP.

The capacity of the WWTP is limited by the approved design criteria contained in the 2011 modification to the NPDES Permit for the City of Snoqualmie's Wastewater Treatment and Water Reclamation Facility (PERMIT # WA-002240-3).

The analysis of projected loading from anticipated growth is as follows:

	Permitted	2032 Projected	Residual Capacity
Max. Month Loading	2.15 MGD	1.95 MGD	.20 MGD
Number of ERUs*	8,052 ERU	7,286 ERU	766 ERU

** Projected ERUs based only on flow with constant Infiltration and Inflow (I&I) measured at the time of the WWP. I&I is variable and significantly different for new systems vs the historic city system. Significant actions are being taken by the City to reduce I&I over time.*

Like the Water System Plan (WSP), the WWP assumes a level of continued development beyond the 20-year projection (2032) that was considered in the design and the rating of the WWTP.

Also, like the WSP, the WWP assumes a significant rate of growth between the 2010 baseline and year 2018 coincident with anticipated completion of Snoqualmie Ridge and Snoqualmie Ridge II, after which the growth factors are significantly reduced.

A number of assumptions are included in the analysis and projections of the 2012 WWP which are of importance in anticipating the City's ability to serve the Mill Planning Area:

- When evaluating the residual capacity of the WWTP by the above projections it would indicate that there is approximately 0.20 MGD of maximum month residual capacity (2.15 MGD – 1.95 MGD).
- Based solely on the ERU analysis in the WWP this would equate to approximately 766 ERU of residual capacity assuming all projected growth at year 2032. However, as noted, the ERU analysis in the WWP does not consider efforts to make significant reductions in system I&I.
- It appears that the ultimate capacity of the WWTP will be the max. month flow limitation and be dependent on continued efforts of I&I reduction.

2021 Draft General Sewer Plan

At the time of this UPDATED Snoqualmie Mill PCIP Application, the City has completed a Draft 2021 General Sewer Plan (GSP) for Agency review. This GSP fully includes the Snoqualmie Mill site as well as the entire 2012 annexation area in the Sewer Service Area and evaluations of projected growth.

Since the 2012 GSP, there was a 2015 Engineering Report prepared for the Water Reclamation Facility (WRF), i.e., WWTP, that recommended capital projects to improve certain system deficiencies. As of the 2021 Draft GSP 10 of those projects have been completed. The current evaluation of the capacity of the WRF treatment facility from Chapter 7 of the 2021 GSP (Table 7-7) is as follows:

Existing WRF Flow and Loading Capacity Evaluation

Parameter	Existing WRF Design Criteria	Projected Flow and Loading 2030 (10 yrs)[2]	Projected Flow and Loading 2040 (20 yrs)[2]	Units
WRF Influent Flow and Loading				
Average Annual Flow (AAF)	1.64	1.42	1.60	MGD
Maximum Month Average Flow (MMF)	2.15[1]	**2.27**	**2.56**	MGD
Maximum Day Flow (MDF)	-	5.48	6.17	MGD
Peak Hour Flow (PHF)	7.30	5.89	6.63	MGD
Average Annual BOD_5	3,750	3,399	3,678	ppd
Maximum Month Average BOD_5	5,220[1]	**5,655**	**6,118**	ppd
Average Annual TSS	3,750	2,693	2,972	ppd
Maxumum Month Average TSS	5,220[1]	4,041	4,458	ppd
1 = City NPDES permit flow and loading design criteria value.				
2 = Bold values represent projected flow or loading is greater than the design criteria.				

From the 2021 Draft GSP:

"The NPDES permit stipulates that the City shall submit a plan and schedule for maintaining adequate WRF capacity when the flow or loading is projected to meet or exceed the rated capacity within the 5-year planning period. Based on the projections estimated in Chapter 4, both maximum month average flow and maximum month average 5-day BOD (BOD5) are projected to be greater than the existing WRF design criteria within the 5 year planning period. Further evaluation of existing liquid stream and solids handling individual process capacities are presented in the following sections and specific deficiencies are identified for development of recommended improvements in this GSP…"

In the 2021 Draft GSP, deficiencies were evaluated and placed into categories of "Major Improvements" and "Minor Improvements." These improvements are then included in the GSP Chapter 11 Capital improvements as the number one priority for **"Existing System Deficiency Improvements**." The three primary Major Improvements were identified and included in the Chapter 11 CIP as:

- Oxidation Ditch Improvements
- Third Secondary Clarifier
- Reclaimed Water Filter Replacement.

Chapter 11 Capital Improvement Plan of the 2021 Draft GSP also identifies future system improvements and anticipate "Developer Funded" improvements such as **CIP DF5 Mill Site Pump Station Construction** described in the plan as *"At least one pump station facility will be required to serve new development at the Mill Site."*

Snoqualmie Mill Sewer System

The proposed sewer system for Snoqualmie Mill will be a combination of gravity collection systems and lift stations to convey sewage to the City's WWTP.

As mentioned previously, it is estimated that the City's wastewater treatment facility may not have sufficient BOD_5 treatment capacity to serve the full buildout of Snoqualmie Mill Planning Area 1 or Planning Areas 2 and 3 under the Proposed Action based on the 2020 GSP update. Additional improvements to increase the wastewater treatment facility's rated BOD_5 loading capacity are necessary to support full development of Snoqualmie Mill Planning Area 1 under the Proposed Action. These planned improvements are described below.

Planning Area 1

The sewer system for Planning Area 1 is planned to collect wastewater from Planning Area 1 and extend to the east boundary of PA 1 for future flows from Planning Area 2. See Conceptual Water and Sewer Plan (PCIP Plan Sheet WS-1). The gravity sewer for Planning Area 1 would be designed to accommodate flows from Planning Area 1 and future flows from Planning Area 2. See Planning Area 1 Conceptual Sewer Plan (PCI Plan Sheet WS-2).

Lift Station #1 would be located in the northwestern corner of the site per the recommendations of the *Draft Soils, Geology, Groundwater and Geologic Hazards Report for the Draft Environmental Impact Statement, Earth and Groundwater* (AESI June 2018). It would be designed to serve Planning Area 1 with ability to increase capacity in the future for Planning Area 2. Lift Station #1 would pump to the north under Mill Pond Road and discharge into a gravity manhole which flows directly into the City's wastewater treatment plant (WWTP).

Following PCI Plan approval and as part of the first development application, all proposed and existing affected sewer mains will be sized, and their hydraulic capacities will be determined. These will be determined consistent with flows and peaking factors promulgated in the 2020 GSP update and included in the engineering review for the first Snoqualmie Mill development project.

Planning Area 2 and 3

Planning Area 2 sewer would collect wastewater and flow to Lift Station #2 which would be located on the far eastern boundary of Planning Area 2 per soil conditions described by the *Draft Soils, Geology, Groundwater and Geologic Hazards Report for the Draft Environmental Impact Statement, Earth and Groundwater* (AESI June 2018). Lift Station #2 would pump to the Planning Area 1 gravity sewer stubbed at the Planning Area 1 east boundary which would flow to Lift Station #1. Development of Planning Area 2 would require upgrading the pumping capacity of Lift Station #1.

Planning Area 3 sewer would collect wastewater and flow to Lift Station #3 which would be located on the far eastern boundary of Planning Area 3 per soil conditions described by the Geotechnical Engineer (AESI 2018). Lift Station #3 would be pumped independently to the City's WWTP by force main to the west under the Planning Area 3 future access road and to the north under Mill Pond Road. The Planning Area 3 force main would then discharge into a manhole draining directly to the WWTP.

The plan to serve Snoqualmie Mill Planning Areas 2 and 3 will be reevaluated when the proposed development for both these areas are more certain but prior to design of the utilities for both these areas. At that time, it should be evaluated if one lift station could be used to serve both Snoqualmie Mill Planning Areas 2 and 3 or if both these lift stations could pump to the lift station that will serve Snoqualmie Mill 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.

Preplanning and Engineering for Utilities

There are three aspects of the utility design and extensions which need careful preplanning and engineering for the development of Snoqualmie Mill beyond typical design standards set forth by the City and the Department of Ecology;

1. Stability and minimizing settlement of utilities in unconsolidated soil conditions,
2. Utility design within the floodplain,
3. Pre-planning and design for future development phases to minimize disruption of existing or new facilities, roadways or cause of re-work.

The development of Planning Area 1 and construction of the Mill Pond Road realignment would need to pre-plan and pre-design for the future extension of the Lift Station #3 force main from Planning Area 3. The construction of the Mill Pond Road realignment and entry into Planning Area 1 would need to either construct a portion of the Lift Station #3 force main or provide an easement and future installation alignment that would not require disruption of a newly constructed Mill Pond Road. The receiving manhole for the force mains from Lift Station #1 and Lift Station #3 would need to be designed and constructed in a manner that would accommodate the current connection from Planning Area 1 but would not require disruption of Mill Pond Road for the future connection from Planning Area 3.

Lying within the 100-year floodplain of the Snoqualmie River, it is essential, and required by SMC 15.12.150 and 19.12.150 (Flood Hazard Regulations and Critical Areas Regulations), that utilities be protected from floodwaters or potential contamination of floodwaters. This will require that materials and pipe connection methods minimize potential for leak or infiltration and inflow of groundwater, specifically for sanitary sewer extensions. The two primary protections proposed for Snoqualmie Mill are:

- Materials and pipe connections to be specified and reviewed by the City with development plans, and,
- Manholes and lift stations be designed such that the top elevation (access elevation) be designed above the 100-year base flood elevation.

As the site is underlain with unconsolidated fill soils susceptible to settlement, it is essential that the proposed Lift stations be placed in locations recommended by the Geotechnical Engineer. Thus, the locations for Lift station #1 in the northwest corner of the site and Lift Station #2 and #3 in the far eastern portion of the site provide the ability to design stable foundations for these critical facilities. The utility extensions would be placed within over-excavated utility trenches backfilled with a combination of geotextile fabric and/or rip-rap or compacted import soil to provide a firm unyielding trench bed. However, the design of gravity flow utilities would be provided with a conservative (additional) minimum slope to accommodate modest settlement overtime while maintaining a positive grade and gravity flow.

Planning Area 1 Winery Wastewater and Pretreatment

Part of the project program for Snoqualmie Mill is the Wine Village concept for Planning Area 1. Winery production generates wastewater with uniquely high concentrations of Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS). The Department of Ecology as part of their *draft* **Winery General Permit** has performed a great deal of research in recent years regarding water demand and the volumes and concentrations of wastewater from the production of wine in the State of Washington and following implementation by Ecology, individual wineries within Snoqualmie Mill which plan to produce 7,500 cases or more of wine per year will be required to apply and obtain a Winery General Permit.

One of the conditions of the Winery General Permit is for winery producing activity draining to a public wastewater treatment plant (WWTP). In such cases where the WWTP is a "Listed Facility" by Ecology for receiving winery wastewater, no other measures are necessary by the winery. However, if the WWTP is not a Listed Facility, such as the City of Snoqualmie WWTP, the requirement under the permit is to follow restrictions or pretreatment measures required by the WWTP.

City of Snoqualmie Code **SMC 13.04.460** requires notifying the City where discharges to the public sewer will likely contain a 5-day BOD of greater than 300 parts per million (ppm) or more than 350 parts per gallon by weight of suspended solids, or other toxins prohibited by law. Where necessary as determined by the Director (of Public Works), discharges may be required to provide pretreatment to:

• Reduce BOD to 300 ppm,

- **Reduce Suspended Solids (TSS) to 350 parts per million by weight.**

Typical winery wastewater (according to ecology) can consist of BOD_5 of 3,000ppm or more and TSS of 800ppm or more. The total estimated wastewater flow is shown below. If required by the City, wineries within Snoqualmie Mill could provide individual pretreatment facilities within each winery production space, or pretreatment could be provided in one consolidated facility for all winery production for Snoqualmie Mill. Package pretreatment facilities for small wineries are available from various manufacturers and operators. However, it is assumed that one consolidated facility would be more cost effective and provide better monitoring of total daily flow and concentration consistent with a Group 2 facility (See **FACT SHEET for the Formal Winery General Permit)**.

Snoqualmie Mill
Estimated Winemaking Wastewater Flow
Range of Wineries anticipated at Snoqualmie Mill

		No. of Wineries	Cases of Wine Wine[1] per Year	Volume of (gal)	Wastewater Flow[3] Sept. - Nov. (gal)	Wastewater Flow Sept. - Nov. (gpd)
2,000	Cases per Year	4	8,000	19,040	76,160	846
3,500	Cases per Year	5	17,500	41,650	166,600	1,851

6,000	Cases per Year	2	12,000	28,560	114,240	1,269	***(This esti mat***
10,000	Cases per Year	1	10,000	23,800	95,200	1,058	

ed winery number and size and anticipated wastewater flow is for EIS purposes only)

Totals	**12**	**47,500**	**113,050**	**452,200**	**5,024**

Notes:
1 2.38 gal of wine per case of wine
2 6 gal water demand per gal of wine - Per Ecology research under Winery General Permit
3 4 gal wastewater per gal of wine - Per Ecology research under Winery General Permit
4 Water Demand and Wastewater Flow (Sept. - Nov.) = total volume / 90 days 5 ADD Water Demand = total volume / 365 days

PCI Plan Sheet WS-2 shows a schematic sanitary sewer system for Planning Area 1. The system would consist of collection of domestic sewage discharging to Lift Station #1. The system also shows separate collection of winery wastewater discharging first to a Pretreatment Facility, then to Lift Station #1. Lift Station #1 would then pump raw domestic sewage and pretreated winery wastewater to the headworks of the WWTP.

SMC 14.01.470 states… *"Where preliminary treatment facilities are provided for any waters or wastes, they shall be maintained continuously in satisfactory and effective operation and by the owner at his expense…"* However, as shown on PCI Plan Sheet WS-2, Snoqualmie Mill proposes to locate both the pretreatment facility and Lift Station #1 essentially in the same location as a unique combined facility in which the pretreatment facility could be dedicated to, owned and operated by the City along with the Lift Station.

The level of pretreatment of the winery wastewater before discharge to the City's sewer system needs to be finalized with the City as plans for the wineries are further developed. Some pretreatment is likely required, but a higher level of pretreatment including biological treatment may be better accomplished at the City's WRF. One option would be for these wineries to acquire sufficient treatment capacity in the City's WRF through appropriate connection fees and sewer service charges to have the winery wastewater treated at the WRF. This could be in the best interest of both the wineries and the City, especially if the City is already planning to increase the capacity of the WRF through conversion of existing treatment processes.

In the 2021 Draft GSP it is acknowledged that Snoqualmie Mill is currently planning wineries but does not attempt to include any increased levels of BOD or TSS in the models of capacity and treatment beyond normal sewage flows. The plan states that evaluations will be made at the time of future permits whether or not it is beneficial to require a level of pretreatment at Snoqualmie Mill. However, in the event that it is required, a location has been selected, along with the pump station (CIP DF5) and is shown on Sheet WS-2 of the PCI plans.

F. Roads, Access, and Parking

Traffic Impact Analyses (TIA) were prepared and included in the DEIS and Appendix F(TIA). As shown on the Overall and Planning Area 1 Site Plans (PCIP Plan Sheets SP-1 and SP-2), primary access to the site is from SR-202 at the Tokul Roundabout and Mill Pond Road. With Mill Pond Road as the gateway to Planning Area 1 and all access points to Planning Areas 2 and 3, new roadway improvements will be constructed starting with Planning Area 1. These improvements would include :

1) Realignment of a portion of the existing Mill Pond Road, moving and shifting it to the north and east.
2) Construction of a roundabout at the entrance to Planning Area 1 to provide access to Mill Street, the main street providing access through Planning Area 1, the mixed-use development area .
3) A future southerly extension of a new access road from Mill Pond Road easterly to serve Planning Areas 2 and 3

Mill Street extends through the mixed-use area linking with internal drive aisles that would connect to individual buildings and parking areas throughout Planning Area 1. A deviation from standard allowed under SMC 17.20.050.I is proposed for Mill Street (See Section VII). Mill Street would provide two travel lanes, with angle parking on both sides. Sidewalks are proposed on both sides and would be 20-feet wide (measured from building façade to curb) on the north side and 12 feet on the south side. Pedestrian amenities would include benches, outdoor seating areas associated with retail uses, street trees and planters. All on-site roads would be private and maintained by the owner. See PCIP Plan Sheet SP-3.

Mill Pond Road, the “entry roundabout” and all or portions of the “New Mill Pond Road” are proposed to be public roads and would, other than the entry Roundabout and possible soft surface trail in lieu of sidewalk, be constructed to City Neighborhood Collector Standards. All other access roads, drive aisles, or parking areas are proposed to be private and would be constructed to meet the standards for access and parking drive aisles.

The DEIS and Appendix F (TIA) analyzed if an additional access from SR-202 via a bridge over the Snoqualmie River is warranted or a planned improvement of the City of Snoqualmie. The EIS found that such an access would not be warranted for Planning Area 1 but that additional traffic studies would be required with Project Level environmental review for Planning Areas 2 and 3.

The majority of the existing Mill Pond Road is proposed to be abandoned, removed and converted to open space, landscaping, wildlife habitat and a recreational trail with a viewing lookout overlooking the stormwater outfall to the Snoqualmie River. These areas west of the “New Mill Pond Road” are proposed to be excavated to provide both conveyance of stormwater to the river as well as additional floodway / floodplain storage capacity.

<u>Phase I Detail</u>

Phase I is anticipated to include all of Planning Area 1. The DEIS and Appendix F (TIA) analyzed necessary routing and traffic volumes to adequately design the private access roads and drive aisles for size and circulation as well as capacity and design configuration for the entry roundabout and New Mill Pond Road.

The Light Industrial / Warehouse portion of Planning Area I is proposed to include ingress and egress from the existing private road north of the site primarily serving Planning Area 2. This private road is bordered on both sides by sensitive area wetland/streams. Future phases of development and future environmental review will evaluate if and how the haul road needs to be improved to accommodate projected traffic and how wetland and streams would be impacted.

The following Planning Area 1 Parking Matrix evaluates the proposed site plan parking as related to the programmatic uses for Phase I and City parking standards. This information is provided for purposes of demonstrating the adequacy of the UPDATED PCI Plan Site Plan in addition to being studied in the EIS.

Snoqualmie Mill P lanning Area I Parking Matrix

Land Use	***Bldg (sf)***	***Area Required Parking Stalls***	***Requirement per SMC 17.65 Table 1***
Residential	104,126	120	***1 stall per unit - 120 units proposed***
Retail	40 ,320	162	***1 stall per 250 gsf of Bldg Area***
Restaurant	28,052	187	***1 stall/4 persons - 1 person/25 sf of 66% of Bldg Area***
Event Facility	31,386	105	***Frequency of use and joint use parking; Assume 50% of Req'd Restaurant/building area***
Light Industrial	128,000	171	***1 stall per 750 gsf of Bldg Area***
Warehouse	304,690	305	***1 stall per 1000 gsf of Bldg Area***
Total Required		***1,050***	
Total Provided on Phase I Plan		***1,114***	

V. PROPOSED DEVIATIONS TO SMC DEVELOPMENT STANDARDS FOR PCI MASTER PLAN

The intent of the PCI zoning district, as stated in the Snoqualmie zoning code (SMC 17.20.050.I), is to ***"…encourage development proposals not constrained by fixed development standards*** **[where]** ***such deviation would advance the purpose of the district as set forth in subsection A of this section…"*** **To implement this objective, the Code authorizes** ***"…deviations from development standards of general application throughout the city…."*** when the City Council finds that such deviations would advance the purpose of the PCI district (SMC 17.20.050, paragraph I).

This section of the UPDATED PCI Plan Application describes a number of proposed deviations pursuant to PCI zoning district regulations and provides justification as to why proposed development standard deviations advance the purpose of subsection A of SMC 17.20.050. Planned Commercial / Industrial District. Subsection A states:

A. The purpose of the planned commercial/industrial district is to provide for imaginative, welldesigned, 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 two 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.*

Furthermore, subsection I provides the opportunity for flexibility in development standards stating:

I. It is the intention of this section to encourage development proposals not constrained by fixed development standards, and toward that end, deviation from development standards of general applicability throughout the city may be authorized when the city council, with the advice of the planning commission, finds that such deviation would advance the purpose of the district as set forth in subsection A of this section, provided deviation shall not be allowed from development standards deemed necessary to protect health, safety or the environment. Any such deviations shall be included in the approved plan for the planned commercial/industrial development.

A. Requested Deviations

The requested deviations were identified during the planning and environmental analysis review stages of the PCI Plan and EIS. The requested deviations are necessary to promote flexibility within the PCI District and achieve the objectives of the proposed PCI Plan. A list of proposed requests for deviations to development standards are identified below.

1. SMC Ch. 12.16 - Street design standards (including street lighting standards)
2. SMC 17.20.050.I. - Requirement for conditional use permit for second story dwelling units above nonresidential uses in the PCI zone
3. SMC 17.20.050.I - Requirement for conditional use permit for restaurants in the PCI zone
4. SMC 17.55.020 Table 1 - Requirement for conditional use permit for retail restaurants, specifically tasting rooms in the PCI zone
5. SMC 17.55.020 - Allowing roads, utilities, trails, and accessory parking for commercial, industrial and residential uses in the OS2 zone
6. SMC 17.55.040 - Height limits
7. SMC 19.12.170.I. - Permitted uses and alterations in wetland buffers

B. Requested Deviation Descriptions and Justifications

1. SMC Ch. 12.16 - Street design standards

A. Street Design Standard Deviation Request Description

The applicant requests that a deviation from standards allowed under SMC 17.20.050.I is allowed specifically in accordance with street design standard compliance of SMC12.16.230 which states:

> ***12.16.230 Compliance***
> *It is recognized that deviations from these standards may be necessary on projects which have special or limiting requirements and it is herein emphasized that each project will be considered on an individual basis….*

There are four proposed street design deviations requested for the Snoqualmie Mill PCIP project. One is specific to Mill Pond Road, two are specific to the proposed Mill Street and one is specific to street lighting standards. See the table below for proposed deviations.

The proposed road sections are shown on PCIP Plan Sheet SP-3. These road sections are proposed with the addition of a Roundabout on Mill Pond Road and portions of Mill Pond Road that may have soft surface trails in lieu of sidewalks.

Justification

The Snoqualmie Mill PCIP road sections are proposed in accordance with the flexibilities allowed in SMC 17.20.050.I and Road Standards Compliance SMC 12.16.230. The proposed deviations would address physical and geotechnical issues with Mill Pond Road, would enhance the shoreline environment, and would facilitate the design concept for the proposed mixed use area.

Proposed Road Deviations and Required Elements to Meet Code:

Roadway and Classification	Cross Section	Deviation	Required Standard to Meet Code
Mill Pond Road – Neighborhood Collector	Section A- A	• Roundabout added to Neighborhood Collector	• There is no City standard for a Roundabout.
Mill Street – Local Access	Section C-C	• 8 foot and 12 foot sidewalks both sides • No planter strips • Angle Parking both sides with 62 feet of paving to accommodate 2 travel lanes (11 feet each) and 20 feet each side for angle parking	• 6 foot sidewalk and 5 foot planter strip both sides • Parallel Parking one side • Minimum 28 feet of pavement width
Mill Street – Local Access	Section D-D	• 12 foot and 20 foot sidewalks both sides • No planter strips • Angle Parking both sides with 62 feet of paving to accommodate 2 travel lanes (11 feet each) and 20 feet each side for angle parking	• 5 foot planter strip and 6 foot sidewalk both sides • Parallel Parking one side • Minimum 28 feet of pavement width

Mill Pond Road Justifications

1. Physical and geotechnical considerations:

Mill Pond Road in its current configuration is located within the shoreline environment of the Snoqualmie River. Based on geotechnical analysis and investigation there are geotechnical soil

instabilities in the fill and subsurface soils which the existing road prism was constructed on. The proposed realignment of Mill Pond Road, as shown on PCIP Application Plan Sheet S-3, shifts a portion of Mill Pond Road to the east away from the Snoqualmie River to align with the proposed entrance, known as Mill Street, in Planning Area 1.

Realigning and constructing a new portion of Mill Pond Road as proposed will require 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. The roundabout will provide the gateway entrance into the Mill Street village retail and commercial area and will enhance traffic circulation than would otherwise occur with a T-Intersection.

2. How does the deviation enhance the shoreline environment?

As proposed, a portion of Mill Pond Road would be relocated/realigned away from its current location directly adjacent to the Snoqualmie River. By realigning the road, additional area next to the Snoqualmie River is proposed to be restored through removal of the retired portion of the road and replanted to establish forest vegetation which would contribute to enhancing the shoreline environment.

Mill Street Justifications

The deviation to street design standards proposed for Mill Street includes wider sidewalks / pedestrian walkways. No planting strips are proposed allowing for wider pavement and angled parking. Street trees and landscaping elements would be provided intermittently along the wider sidewalks / pedestrian walkways and angle parking along Mill Street.

The wider sidewalks and angled parking on both sides of Mill Street would promote access and pedestrian circulation within the mixed use retail and residential aspects envisioned in the design concept for the PCI Plan. The integration of these design concepts contributes to the 'sense of place' focused on the future tasting rooms/wine stores and outdoor equipment sales and promotes accessibility to the pedestrianoriented village center for visitors, residents, and employees.

The proposed departures from street standards would not adversely affect the public health, safety, or the environment.

Therefore, the applicant requests that this deviation be approved.

B. Street Lighting Standards Deviation Request Description

The City utilizes the Snoqualmie Ridge II Development Standards for street lighting. The applicant requests that a deviation to these standards be granted to allow for the development of a lighting plan concept/strategy specific to the Snoqualmie Mill PCIP Commercial and Industrial project master plan.

Justification

The City of Snoqualmie utilizes the Snoqualmie Ridge II Development Standards for citywide development standards for street lighting. The Snoqualmie Mill PCIP Planned Commercial and Industrial project is proposed as a new master plan within the City which will be developed in accordance with approved Snoqualmie Mill PCIP and its conditions of approval and a Development Agreement. 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. As a master plan, the lighting concepts used throughout the project should reflect the vision of the project. Concept plan elements such as lighting, are integral components that will create and enhance the user experience and establish the unique character of the Snoqualmie Mill site.

A lighting plan for exterior lighting of outdoor spaces, such as street, pedestrian walks and pathways, and plaza areas, will be developed during engineering and site development permitting and design. This lighting plan will be derived from the City Street Lighting Standards (Snoqualmie Ridge II) development standards. Deviations will include options to street light typologies and color schemes. The deviation options will be equivalent to street lighting standards and are identified below:

Chapter 7.020-Street Lighting:
Section 7.022.A and C- Poles

- Optional wood pole with industrial look
- Optional color scheme (natural wood color)

Section 7.025.A – Placement and Spacing

- Option for lighting at closer intervals than 200 feet (for Mill Street in Planning Area 1 only)

Deviations requested from the above-mentioned street lighting development standards would provide equal or better lighting, light output, energy efficiency, color rendition, and would meet or exceed City and PSE installation and maintenance requirements consistent with City standards.

The proposed options to lighting standards and the allowance of lighting typologies options would not adversely affect the protect health, safety, or the environment.

Therefore, the applicant requests that this deviation be approved.

2. SMC 17.20.050.I. - Conditional use permit (CUP) requirement for second story dwelling units above nonresidential uses in the PCI zone.

Residential Use Deviation Request Description

The applicant requests that a deviation, pursuant to SMC 17.20.050 paragraph I, be granted to allow the inclusion of multi-family residential units above ground floor commercial or office uses in mixeduse buildings in Planning Area 1 as a permitted use. The deviation request is limited to the number of units approved in the Snoqualmie Mill PCIP decision.

Justification

Planning Area 1 is proposed to develop with a predominant mix of light industrial/manufacturing, warehouse and retail uses. Multi-family residential units (160 proposed) will be located in 3 buildings above street-level businesses. This mix of uses would be located in a compact smallscale village, along a main pedestrian-oriented street -Mill Street.

Mixed-use pedestrian-oriented development as proposed has been shown to reduce vehicle trips and facilitate walking and biking by locating housing and jobs within walking distance of each other and/or within the same building. The integration of uses in a compact, higher density land use pattern can reduce the consumption of land and energy and emissions of greenhouse gases. The Draft EIS sections on Air Quality (3.2), Land Use (3.6), Plans & Policies (3.7), Transportation (3.11) and Noise (3.12) identify that the mixed-use component of the proposed PCI Plan is consistent with environmental factors and City policy. The code's performance standards (SMC 17.55.080) also require that residential uses are protected from on-site impacts, such as from odors, vibration, heat, noise, potentially associated with light industrial/manufacturing activities.

This deviation request is specific to and limited to residential multi-family units proposed in Planning Area 1. The total gross leasable area of the residential mixed-use units is 134,000 sf. This information is included in the project program table in Section IV of the PCIP Application (January 2022) on page IV-4.

The proposed departures from standards to allow multi-family residential units above ground floor commercial or office uses in mixed-use buildings in Planning Area 1 as a permitted use would not adversely affect health, safety or the environment.

Consistency with CUP criteria per SMC 17.55.030.B. is addressed below:

1. The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and in the district in which the subject property is situated;

   The PCI Plan's proposed mix of residential and commercial/retail land uses in Planning Area 1 includes integrated and mutually supporting land uses that would add vitality to the pedestrian-oriented village. Mixed-use development would be environmentally beneficial by potentially encouraging walking and cycling, and reducing auto use and related noise and greenhouse gas emissions. Market rate multi-family units would contribute to the City's housing supply. As described in the Draft EIS, the inclusion of residential units would not adversely impact the environment or neighboring

properties on-site or off-site, and would not adversely affect the public welfare. The PCI Plan would generate employment and business opportunities, would produce tax revenues, and would result in a net positive revenue stream to the City.

2. The proposed use shall meet or exceed applicable performance standards;

   Development of the site consistent with the PCI Plan will be governed by adopted Conditions of Approval, a Development Agreement, City development standards and approved mitigation measures identified in the EIS. The zoning code (SMC 17.55.080) includes performance standards that would mitigate potential impacts to residential uses from industrial activities.

3. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building, and site design;

   Proposed multi-family residential units would be located in a compact, small-scale mixeduse village along a pedestrian oriented main street. The village is internal to the PCI Plan site and would not generate externalities to surrounding properties. The mixed-use residential buildings would be compatible in scale with existing/historic and planned industrial buildings on the Snoqualmie Mill site and would not be visible from most offsite locations. A requested deviation for building height is discussed in No. 6 below.

4. The proposed use shall be in keeping with the goals and policies of the comprehensive plan;
   Section 3.7/Exhibit 3.7-4 of the Snoqualmie Mill Draft EIS discusses the consistency of the proposed PCI Plan with the City's overall Vision and with 38 major policies of the Comprehensive Plan, including those touching on Economic Development, Housing, Community Character, Environment, Transportation, Capital Facilities and Utilities. That discussion, which is not repeated here for the sake of brevity, concludes that the proposal is consistent with the Comprehensive Plan's goals and policies. Specific to housing, the provision of housing in the project is consistent with Comprehensive Plan Housing Element Goal 4, which states "a broad range of durable and energy-efficient housing options are available for all income levels to support a complete and sustainable community."

5. All measures should be taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.

   The Snoqualmie Mill PCI Plan EIS describes environmental impacts associated with the proposed PCI Plan including the residential units in mixed-use buildings. The analysis does not identify distinct or significant impacts associated with residential units/population. Mitigation measures for the traffic impacts generated by Planning Area 1 and proposed residential development include numerous planned improvements. Impacts to public services (fire and police service, schools, parks and recreation) and utilities (sewer and water) are incremental and mitigation is proposed where warranted.

3. SMC 17.20.050.I - Conditional use permit requirement for restaurants/taverns in PCI zone

Restaurant Deviation Request Description

The applicant requests that a deviation, pursuant to SMC 17.20.050 I, be granted to allow restaurants in Planning Area 1 as a permitted use.

Justification

The PCI Plan concept for Planning Area 1 is for a mixed-use pedestrian-oriented village area located along a main street, incorporating a mix of light industrial/manufacturing, residential and supportive retail uses. The proposed integration of light industrial/manufacturing uses such as wine production with residential and supportive small-scale retail uses is fundamental to the design and function of the mixed-use village concept. Restaurants are included in the potential retail mix; they would serve on-site residents, workers and visitors and would and would add to the village's interest and vitality. The code's performance standards (SMC 17.55.080) would require that restaurant uses address potential impacts to on-site uses, such as from odors, vibration, heat, and noise associated with their operations.

The deviation request is to allow restaurants as permitted uses in Planning Area 1 and 3, with most located in Planning Area 1 in the mixed-use village. The total gross area of restaurant use is approximately 15,000 sf. This information is included in the project program table in Section IV of the PCIP Application (January 2022) on page IV-4.

The PCI Plan also includes an event center in Planning Area 1 (31,000 sf total), which would function as a venue for weddings, parties, meetings, etc. The anticipated frequency, size and timing of events is described in the EIS. Neither the zoning code's definitions (SMC 17.10.020) nor the table of uses (SMC 17.55.020 Table 1) include a comparable land use category, however. While some events would likely include food service, the event center is not a restaurant per se; in addition, food service would not occupy the entire area of the event center. Because of uncertainty as to how to categorize the event center, it is included in the deviation request as a restaurant.

The proposed departure from standards to allow restaurants/taverns as permitted uses in Planning Areas 1 and 3 would not adversely affect health, safety or the environment.

Consistency with CUP criteria per SMC 17.55.030.B. is addressed below:

1. The proposed use will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and in the district in which the subject property is situated;

   Restaurant uses, and potentially tavern uses, are integral to the mixed-use concept of planning Area 1 and would contribute to the interest and vitality of the proposed village. Such uses are typically developed at street level in mixed use buildings and can be located without adverse impacts to the environment or property. The EIS does not identify any significant on-site or off-site spill-over effects.

2. The proposed use shall meet or exceed applicable performance standards;

   The Snoqualmie Mill EIS does not identify any significant impacts – such as noise, odors, traffic or parking -- associated with the operation of restaurant/tavern uses. The proposal would implement any applicable performance standards in SMC 17.55.080 related to these uses.

3. The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building, and site design;

   Restaurants/taverns are proposed primarily within Planning Area 1, which is a small-scale, pedestrian-oriented, mixed-use village containing a blend of residential, commercial and industrial activities. Restaurant/tavern uses would be located at street level adjacent to other retail and commercial uses along the main village street. On-site uses surrounding the mixed-use area and providing a buffer from adjacent off-site uses, would include open space and proposed commercial and industrial. A planned trail system would provide circulation within the PCI Plan site and connections to off-site areas, including downtown Snoqualmie.

4. The proposed use shall be in keeping with the goals and policies of the comprehensive plan;

   Section 3.7/Exhibit 3.7-4 of the Snoqualmie Mill Draft EIS discusses the consistency of the proposed PCI Plan with the City's overall vision and 38 major policies of the Comprehensive Plan, including those touching on Economic Development, Housing, Community Character, Environment, Transportation, Capital Facilities and Utilities. That discussion, which is not repeated here for the sake of brevity, concludes that the proposal is consistent with the Comprehensive Plan's goals and policies.

5. All measures should be taken to minimize the possible adverse impacts which the proposed use may have on the area in which it is located.
   The Snoqualmie Mill PCI Plan EIS describes environmental impacts associated with the range of activities included in the proposed PCI Plan. The analysis does not identify distinct or significant impacts associated with restaurant/tavern uses . The PCI Plan includes sufficient parking, consistent with City standards, to accommodate the proposed use.

4. Interpretation of the Zoning Code (SMC 17.10.020 paragraph UUU and SMC 17.55.020 Table 1) to recognize wine tasting rooms as a permitted use in the PCI zone.

Tasting Room Deviation Request Description

The PCI Plan proposes to develop Planning Area 1 as a pedestrian-oriented village area along a main street, incorporating a mix of manufacturing, retail, and residential uses. The applicant requests the ability to have tasting rooms in connection with wine production facilities.

Justification

A potential focus of Planning Area 1 is on wine-related light industrial/manufacturing uses, which would integrate wine tasting rooms in winery production facilities in a manner that allows patrons to view the manufacturing process. Small-scale wineries are the target market for the project.

This integration of activities is consistent with the Snoqualmie zoning code, SMC 17.10.020 paragraph UUU, which permits "specialty light industrial/manufacturing uses" within the PCI district. Such uses are defined as follows:

"Specialty light industrial/manufacturing" means a small-scale light industrial/manufacturing business under 10,000 square feet in total floor area whose products are of an art/craft or specialty food or beverage nature, which contains a storefront retail sales component which is open during normal retail business hours for the zoning district and may provide an opportunity for customers or the general public to observe the product fabrication or manufacturing process. Specialty light industrial/manufacturing uses include, by way of illustration, microbreweries, coffee roasters, candy makers, and pottery, glassblowing and jewelry-making studios and any similar type of business.

The applicant interprets wine tasting rooms to be the functional equivalent of microbreweries, which are permitted outright as specialty light industrial/manufacturing use by SMC 17.55.020 Table 1.

However, if the Council determines that a tasting room does not fall within this definition and would typically require a conditional use permit, then the applicant requests that tasting rooms be permitted as a deviation to fixed development standards of general applicability as authorized by SMC 17.17.20.050 I. The development concept for Planning Area 1, described above, is consistent with the purpose of the PCI district (SMC 17.50.050 A) in terms of its reasonable scale; mixed-use character; compact design and efficient use of land (11% building coverage); open space (2/3 of the planning area) and trails; pedestrian orientated village design; and compatibility with adjacent uses as discussed in the Draft EIS (section 3.6).

The proposed departures from standards to allow tasting rooms in connection with wine production facilities in Planning Area 1 as a permitted use would not adversely affect health, safety or the environment. These facilities would be the functional equivalent of microbreweries, which are permitted outright as a specialty light industrial/manufacturing use in the PCI zone (SMC 17.55.020 Table 1). The consistency of wine tasting rooms with the conditional use permit criteria is addressed in Deviation Request #3 above.

5. SMC 17.55.020 - Allowing roads, utilities, trails as permitted uses in the OS-2 zone

Allowed uses in OS-2 Zone Deviation Request Description

The applicant requests that a deviation, pursuant to SMC 17.55.020, be granted to allow roads, utilities, and trails as permitted uses in the OS-2 zone, as generally described and depicted in the Snoqualmie Mill PCIP Application, including Plans.

Justification

The majority of the site is zoned PCI (Planned Commercial/Industrial District); approximately 39 acres of Planning Areas 1 and 3 lying south and west of the FEMA floodway are zoned OS-2 (Open Space 2). The PCI District requires 35 % of the site acreage to be dedicated as open space and natural uses. The zoning code encourages imaginative master planned designs together with allowances for deviations from most development standards for PCI zoned properties.

The existing Mill Pond Road currently lies within the OS-2 zone and is the primary access to the site. A portion of Mill Pond Road including an entry roundabout is proposed to be reconstructed to provide a new stable road for access, but due to geometric constraints cannot be relocated entirely out of the OS-2 zone. The PCIP has been carefully planned to avoid any proposed building structures in the OS-2 zone, but does propose extension of public utilities which are allowed within the floodway. These public utilities will be for the most part coincident with the realignment and construction of Mill Pond Road, a public road.

Per SMC 17.55.020 – Table 1 (Table of Uses) public utilities are allowed uses within the OS-2 Zone with a conditional use permit. Uses not explicitly identified in Table 1 as allowed or not allowed include roads and trails. Parks and Open space are permitted outright, and trails are generally an integral component/feature in these areas and are considered as implied uses. However, Table 1 does not explicitly identify trails as a permitted use, therefore a deviation is being requested to allow trails as a permitted use within the OS-2 Zone. Soft surface trails proposed in Planning Areas 1 and 3 within the OS-2 Zone are identified on PCIP Plan Sheet SP-1. Final alignment and design will be included with future engineering and site development permitting

<u>Planning Area 1</u>
Realigned Mill Pond Road – approximately 1,140 LF*
Soft Surface Trail - approximately 690 LF*

<u>Planning Area 3</u>
East – West Connector Road – approximately 1,363 LF*
Soft Surface Trail - approximately 1,363 LF*
** To be quantified with future engineering and site development permitting*

Mill Pond Road is currently located within the OS-2 Zone. As mentioned above the geometric constraints for the realignment and construction of Mill Pond Road (including water/sewer and storm utilities) restrict the ability to relocate the road further to the east out of the OS-2

Zone. Therefore, a deviation is requested to allow roads and trails to be permitted outright in the OS-2 Zone.

Given that the PCI Master Plan in total proposes 64 % of the site to be retained in open space, well beyond the 35%, which is designed to be interconnected open space with the OS-2 zone, and in consideration of the allowances to development standards intended by and defined specifically under SMC 17.20.050.I, the PCIP requests that this deviation be approved.

The proposed departures from code to allow public utilities, roads and trails as permitted uses in the OS-2 Zone commensurate with the realignment and construction of Mill Pond Road, a public road within the OS-2 Zone, would not adversely affect the public health, safety or the environment. The realignment and construction of Mill Pond Road will improve public health, safety and environment factors by moving the road further away from the shoreline environment and constructing the roadway corridor on a geotechnically stable roadbed.

6. SMC 17.55.040 (height limits)

Building Height Deviation Description

The applicant requests a deviation from the 40' height limit in the PCI district. Proposed height for all buildings except the 3 Mixed-Use/Residential buildings is a maximum of 55' to the ridgeline and 35' to the eave line, which echoes the height of the Planer Building. The Mixed- Use/Residential buildings are planned to be a maximum height of 70' to the ridgeline of the roof and 55' to the eave line. The heights would be measured consistent with City standards. The purposes of the deviation are to accommodate the needs of a variety of potential industrial and manufacturing users; and to allow flexibility in the design of the mixed-use building and to support proposed residential density.

Justification

The proposed deviation would be consistent with the scale of historic industrial buildings that have been located on the Snoqualmie Mill site for almost a century. This historic scale is reflected in the 55' height of the Planer building, which is located in PCI Plan Planning Area 3 and is planned to be preserved and rehabilitated as feasible. This existing building has been used in the PCI Plan to suggest a building scale that is consistent with the site's industrial history.

Gabled roofs are expected on buildings abutting Mill Street and the Mill Street visual corridor to match the character of the historic mill structures, i.e., the Planer Building. Gabled roofs may also appear in Planning Area 3. Other structures will have flat roofs with parapet walls. The deviation request includes allowance of flat-roofed buildings to be allowed up to 55 feet in height measured to the parapet. The height limitation would be the eave line, similar to Mt Si High School.

Specific buildings have not yet been designed. This would occur with development plan approval for the site and building permit applications associated therewith.

Buildings of the proposed height would also be consistent with adopted policy and would not cause significant impacts to views. The Snoqualmie Comprehensive Plan Community Character element identifies several general view corridors and encourages protection of views of significant natural and scenic resources within these corridors. However, these corridors are not regulated by the Snoqualmie Municipal Code. The Aesthetics discussion (section 3.9) of the *Snoqualmie Mill PCI Draft EIS (2020)* used photo-simulations to evaluate potential view impacts of buildings of the proposed height from a dozen off-site public viewpoints, including the view corridors identified in the City's Comprehensive Plan. The Snoqualmie Mill site is bordered by dense vegetation along most of its boundary that completely blocks views of on-site buildings from most publicly accessible off-site locations, including Snoqualmie Falls, the Salish Lodge, Sandy Cove Park, the SR202 bridge, and the western portion of Mill Pond Road. While some buildings of the heights proposed in the PCI Plan would be partially visible from some locations, such as Borst Lake, buildings would not block views of the surrounding mountains and scenic landscape. Existing historic on-site buildings, including the Planer building and the powerhouse smokestack, are also visible from these same locations. From distant elevated locations, such as the Snoqualmie Casino and Mt. Si, the general forms of buildings on the site would be visible but indistinct.

As demonstrated in the EIS, no views would be obstructed or altered by allowing the proposed building heights. The proposed departures from height standards in the PCI Zone as proposed above would not adversely affect health, safety or the environment

7. SMC 19.12.170.I. - Permitted uses and alterations in wetland buffers

Permitted Uses and Alterations in Wetland Buffers Deviation Request Description

The applicant requests that a deviation, pursuant to and consistent with SMC 17.20.050.I, 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, be granted. The deviation is requested to allow the wetland buffer impacts, restoration and enhancement as generally described and depicted in the Snoqualmie Mill PCIP Application including PCIP Plan Sheet CA-1.

- The Deviation bases its justification on the Applicant's Consultant's report in the FEIS. Appellants at hearing will document the inadequacy of the Applicant's submittals.

- The Plan would drastically change wetland hydrology, not maintain it as required by the Direct Discharge criteria. This issue will be documented during the FEIS hearing.

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- The functions and value of constructed wetlands that are used as stormwater storage ponds are very different than natural wetlands. Constructed wetlands do not make up for degraded or altered wetlands and buffers. The FEIS hearing will document this.

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Notwithstanding any analysis from the Applicant's consultant in the FEIS, the Applicant must comply with the City's code.

The Plan's proposed use of wetlands as drainage facilities does not comply with SMC 15.18.180 because the wetlands have not been approved as described in subsection (C) nor does the project qualify under subsections (A) or (B)

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SMC 15.18.180:
Notwithstanding any other provision of this code, drainage facilities shall not be built within a natural vegetated buffer or wetland, provided:
A. Conveyance systems may be approved by the city when there is no feasible alternative;
B. Drainage facilities may be located in the outer 15 feet of a wetland buffer when required by engineering constraints, and when such discharges are designed to be infiltrated into appropriate soils or discharged as surface sheet flow in appropriate slope conditions, pursuant to SMC 19.12.170(H)(3); and
C. Drainage facilities may be allowed in wetlands approved for hydrologic modification and/or treatment in accordance with Guidesheet 1 in Appendix I-D of the Washington State Department of Ecology Stormwater Management Manual for Western Washington (2012, amended in 2014). (Ord. 1198 § 19 (Exh. B), 2017; Ord. 1081 § 2, 2011).

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The Plan does not demonstrate how it complies with the following requirements of SMC 19.12.090 (B)(3) Buffer Averaging:

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The director may allow wetland or stream buffer averaging only when the buffer area width after averaging will not adversely impact the critical area and/or buffer functions and values, including wetland hydrology that causes short- or long-term changes in native vegetation composition, soil characteristics, nutrient cycling or water chemistry. At a minimum, any proposed buffer averaging shall meet the following criteria:

a. The resulting buffer area is no less than that which would be provided by the standard buffer;

b. The buffer width shall not be reduced by more than 25 percent at any one point as a result of the buffer averaging, and provided, buffer averaging shall not result in a wetland buffer being reduced to less than 25 feet at any one point in any case;

c. The buffer area is reduced by averaging only in those locations where the least significant upland habitat is present within the standard buffer zone, and the areas for increased buffer incorporate the highest functioning upland habitats, where feasible;

d. The buffer area may be required to be enhanced where the buffer is allowed to be reduced, if the buffer is in a degraded condition;

e. The areas of expanded buffer width are contiguous with the standard buffer;

f. Encroachment into the buffer does not occur waterward of the top of an associated steep slope or into a channel migration zone;

g. Encroachment does not occur into the buffer of an associated wetland except as otherwise allowed; and

h. Buffer averaging shall not result in the relocation of any portion of a buffer onto an adjacent property not in common ownership.

The Plan does not show how it complies with the following requirements of SMC 19.12.090 (A) Mitigation Sequencing:

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A. Mitigation Sequencing. Conditions to protect critical areas and buffers shall be sequenced as follows:

1. Avoid the impact by refraining from certain actions or parts of an action to the extent feasible;

2. Minimize the impacts by limiting the degree or magnitude of the action, by redesigning the proposed project to minimize impacts and/or avoid or reduce impacts by using appropriate technology, best management practices and design strategies;

3. Remediate the impact by repairing, rehabilitating, or restoring the affected environment;

4. Reduce or eliminate the impact over time by preservation and maintenance operations;

5. Compensate for the impacts by creating, replacing, enhancing, or providing substitute resources or environments;

6. Monitor the mitigation provided for the impact and take appropriate corrective measures when necessary.

The Plan does not show how it complies with the following requirements of SMC 19.12.090 (F) (4) Mitigation Monitoring:

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3. Mitigation Monitoring. The time period for mitigation monitoring shall be established per the administrative rule established per subsection (F)(3) of this section, and shall be subject to the following minimum standards. Monitoring for compensatory mitigation for alteration of a wetland or stream shall occur for a minimum of five years. In the case of forested and scrub-shrub wetlands, monitoring shall occur for a minimum of 10 years, with reports submitted in years 1, 2, 3, 5, 7, and 10 and shall be secured with a bond or assignment for security.

Additionally, the Plan's reliance on a non-profit to maintain common areas would jeopardize the monitoring requirements in SMC.

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Justification

The following excerpts are from the Snoqualmie Mill PCI Plan FEIS, Section 3.5.2 (1) Wetland Buffers and Appendix C, Wetlands, Wildlife and Fisheries Assessment (Raedeke Associates); it explains the proposed approach to mitigating impacts and enhancing wetland buffer function and area.

"As discussed in the Wetlands, Wildlife, and Fisheries Assessment (Appendix C of the Draft EIS), the existing wetland buffers are highly degraded and do not provide more than a relatively low level of functions such as protection of water quality or habitat. It is acknowledged in the Draft EIS that the PCI Plan proposed for Planning Area 1 cannot strictly comply with the Code's quantitative buffer width requirements on a wetland-by-wetland basis.".

Due to the degraded nature of the existing wetland buffers , the project proposes an approach to wetland buffer protection that restores and enhances buffer areas for a net substantial improvement of buffer functions and wetland protection. *"The PCI Plan proposes to implement a buffer management, restoration, and enhancement plan that is consistent with provisions of Chapter 17 of the Snoqualmie Municipal Code (SMC 17.20.050). The provisions, discussed in the Draft EIS, allow for flexibility in development standards, which includes buffer requirements, provided that the deviation from strict application of standards does not threaten health, safety, or the environment." The buffer restoration and enhancement plan is conceptual in nature at this time, pending further direction from the City Council. A more detailed restoration and enhancement plan would be prepared following a City Council discretionary decision on the proposed.*

"The proposed buffer mitigation plan would result in substantial improvement of buffer functions and protection of wetland resources. The plan provides buffers that would average approximately 175 feet wide overall, with buffers on most of Wetland 12 averaging 105 feet. As discussed in the DEIS Appendix C, the proposed on-site buffer widths are generally within the range of buffer widths recommended by Ecology (Sheldon et al. 2005, Hruby 2013) for protection of water quality functions, given the currently degraded nature of the site and modified state of the wetlands.

In Planning Area 1, the proposed buffer plan includes approximately 4.2 acres of permanent wetland buffer impacts, some of which would be for the constructed stormwater wetland facilities, and approximately 5 acres of compensatory

buffers (additional buffer area that will include vegetative enhancement). Most of this existing buffer area that would be impacted is highly degraded. Collectively, for Planning Area 1 wetlands overall, the proposed buffer plan would provide more buffer area than would be required if current buffer requirements were applied wetland by wetland using standard buffers, and the plan includes the restoration or enhancement of the entire wetland buffer area."

"The proposed PCI Plan would avoid direct impacts to wetlands and would minimize impacts to wetland buffers. A proposed mitigation measure in Draft EIS Section 3.4.3 recommends avoiding construction staging in wetland buffers to the extent possible. "

"The proposed PCI plan (Figures 12 and 13) for the on-site wetlands within Planning Area 1 and the Snoqualmie River has been developed in accordance with SMC 17.20.050 A and SMC 17.20.050 I and would result in a substantial improvement of buffer functions and protection of wetland resources. The plan would provide buffers that average approximately 175 feet in width to wetlands within Planning Area 1 overall. Buffers would be wider for some wetlands than for others (Figure 12). Buffer widths would be considerably wider than standard buffers specified by the code for portions of Wetlands 28 and 29. The narrowest buffers occur adjacent to Wetland 12 where the average buffer for that wetland would be approximately 105 feet. The proposed buffer widths, including those areas where the proposed buffer is less than the standard width specified under SMC Table 19.12.170-1, are within the range of buffers recommended by WDOE (Sheldon et al. 2005) for protection of water quality and wildlife habitat functions. The standard 100-foot buffer for the Snoqualmie River specified by the City of Snoqualmie Shoreline Master Program largely is proposed to be provided by realigning SE Mill Pond Road away from the River and restoring that portion of the river buffer through removal of the retired portion of the road and replanting that area to establish forest vegetation (Figure 13).

A total of approximately 17.8 acres of upland buffer is provided to the on-site wetlands. This represents approximately 0.83 acres of additional buffer area that would be provided to the wetlands within Planning Area 1 compared to what would be provided if the standard wetland buffers specified under SMC Table 19.12.170-1 were applied. The buffer plan is designed to retain a large block of young forest within the south portion of the site and to provide a habitat corridor linking the onsite wetlands with each other and to large habitat areas associated with Borst Lake (Mill Pond) and the Snoqualmie River. In addition, the proposed habitat corridor abuts approximately 63 acres located in the central portion of the site that will be devoted to passive open space, wildlife habitat, wetland mitigation and compensatory flood storage as part of the future development of Planning Area 3. This future open space area will increase the benefits to wildlife using the habitat corridor created within Planning Area 1.

All on-site wetland buffers and the buffer for the right bank of the Snoqualmie River in the vicinity of the re-alignment of SE Mill Pond Road would be either restored or enhanced. Buffer restoration would occur within areas identified as non-functional buffer or where grading is necessary for flood storage compensation to remove a berm along the southern edge of Wetland 12 (western portion). All existing roads, building foundations, hardscape surface, and areas of compact gravel fill would be removed from the buffer restoration areas with the exception of an approximately 950 square foot portion of an existing concrete pad at the south end of the western lobe of Wetland 12 that is currently used to store materials for the DirtFish Rally School. Following removal of these structures and impervious surfaces, a minimum of 12 inches of topsoil amended with compost would be installed in order to provide fertile soil conditions for buffer plantings. The concrete pad at the south end of the western lobe of Wetland 12 would be removed and the buffer in that area restored as part of future development of Planning Areas 2 and/or 3.

The restored buffers would be planted with native trees, shrubs, and herbaceous species at densities sufficient to establish a well-vegetated, forested community.

Buffer enhancement would occur in areas where native forest vegetation is already established and would be retained. Non-native, invasive species such as Himalayan blackberry and Scotch broom would be removed. Native coniferous trees such as western arborvitae (Thuja plicata, formerly western red cedar) and Sitka spruce would be planted in the understory along with native, shade-tolerant shrubs to increase the vegetation density species diversity of these areas.

With implementation of the proposed buffer restoration and enhancement plan, on-site wetland buffer functions will be provided at a higher level than if the standard wetlands buffers were applied and the wetlands will be well protected. Therefore, assuming this plan is implemented, we do not anticipate that the proposed PCI Plan would result in significant adverse impacts to the on-site wetlands or the Snoqualmie River from development of Planning Area 1.

Planning Areas 2 and 3 Buffer Impacts. As with Planning Area 1, the existing wetland buffers within Planning Areas 2 and 3, particularly within the eastern portion of the PCI Plan area, are degraded and either non-functional or poorly functioning (Goldsmith 2012a). Future development of Planning Area 3 will set aside almost 70 acres in the central area of the site to function as a conservation corridor devoted to passive open space, wildlife habitat, wetland mitigation and compensatory flood storage and will provide wide buffers for wetlands 12, 19, 20/21/22, 24, 25, 26, and 27 within that portion of the PCI Plan area.

Additional site analysis and planning will be required in the future to determine whether alteration to City-jurisdictional wetland or stream buffers is necessary."

VI. SOURCES REFERENCED (NOT ATTACHED)

- City of Snoqualmie- Environmental Document Issuance ○ Snoqualmie Mill PCI Plan Environmental Impact Statement (EIS) ○ DRAFT Environmental Impact Statement (April 2020) and Technical Appendices A-F ○ FINAL Environmental Impact Statement, December 2021

- Associated Earth Sciences, Inc.
  - Preliminary Geotechnical Engineering Report, 2012 ○ Critical Aquifer Recharge Area Letter, 2012 ○ Environmental Site Assessment Current Conditions Report, March 5, 2015
  - Draft Soils, Geology, Groundwater and Geologic Hazards Report for Draft Environmental Impact Statement, June 15, 2018

- Cedarock Consultants, Inc.
  - Fisheries Technical Information Report, 2012

- Watershed Science and Engineering ○ Technical Memorandum – Snoqualmie Mill PCIP – No Net Rise Hydraulic Analysis, March 28, 2018 ○ Snoqualmie River Hydraulic Study, 2015

- TENW
  - Transportation Impact Study, 2018

- City of Snoqualmie ○ Comprehensive Plan "Snoqualmie 2032", Adopted December 8, 2014 by Ordinance 1148 ○ City of Snoqualmie Municipal Code
  - General Sewer/Wastewater Facility Plan, Gary & Osborne, Inc., November 2012 ○ 2016 Water System Capacity Analysis Update, Gray & Osborne, Inc., June 27, 2016, and Revision 1, June 27, 2016 ○ City of Snoqualmie Capital Facilities Plan (2017-2022) ○ City of Snoqualmie Res. No. 1115, Approval of Pre-Annexation Agreement, October 2011 ○ Notice of DNS Determination for Pre-Annexation Agreement, July 27, 2011 ○ Staff Summary, September 22, 2011 ○ Council Agenda Staff Report for AB12-076, July 31, 2012
  - City of Snoqualmie Wastewater Treatment and Water Reclamation Facility
    - NPDES Permit WA0022403, June 18, 2008
    - Fact Sheet for NPDES Permit WA0022403, June 18, 2008 and March 19, 2014
    - Addendum to Fact Sheet for NPDES Permit WA0022403, May 18, 2011

- Continuous Monitoring Equipment Plan, Gray & Osborne, Inc., July 2014
- Whole Effluent Toxicity Test Report, Nautilus Environmental, LLC, April 2, 2012
- Notice of Violations No. 10390 and 10707 ○ Sensitive Area Study Approval, June 2016 ○ AIP Approval, November 2016

○ City of Snoqualmie NPDES Municipal Stormwater Permit, 2019 ○ Shoreline Master Plan Update Approval, August 2021 ○ 2021 Draft General Sewer Plan ○ 2021 Draft Water System Plan

- Cultural Resource Consultants, Inc.
  - ○ Cultural Resources Assessment, October 2015

- Cascadia Archaeology ○ Snoqualmie Mill Planned Commercial/Industrial Complex SEPA Cultural Resources Assessment, January 5, 2019

- FEMA Letter of Map Revision Determination Documents, 2009 ○ FIRM Panels, 2011 ○ Letter of Map Amendment, 2016
  - ○ FIRM Panel 07371, Updated August 2020

- King County GIS Mapping

- Raedeke Associates, Inc.
  - ○ Wetland Delineation & Wildlife Reconnaissance, 2012 ○ Jurisdictional Determination Technical Memorandum, January 27, 2015 ○ Wetland Ratings and Buffer Width Technical Memorandum, June 4, 2015 ○ Tokul Roundabout Soils Receiving Area – Wetland Ratings and Buffer Widths, July 21, 2015 ○ Existing Conditions Map, June 2015
  - ○ Wetlands, Wildlife and Fisheries Assessment – Preliminary Draft EIS, March 12, 2019

- Washington State Department of Ecology ○ Ecology Report of Examination for Water Right Change CG1-20316C, CG1-00059S and CG100060S, December 2018

- US Army Corps of Engineers ○ Memorandum for the Record, July 24, 2013 ○ Jurisdictional Determination, August 2015

- Wilma, David, Historical Research Papers and Photographs

Appendix A

City of Snoqualmie PCI Determination of Completeness Application Review Memorandum, April 19, 2017 and

- Applicant Response Letter (January 14, 2022)

Perteet Memorandum – Snoqualmie Mill PCI Plan Application Review Comments, April 4, 2107 and

- Applicant Response Letter (January 14, 2022)

COMMUNITY DEVELOPMENT DEPARTMENT
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DETERMINATION OF COMPLETENESS APPLICATION REVIEW
SNOQUALMIE MILL, PLANNED COMMERCIAL/INDUSTRIAL PLAN APPLICATION
(PCI 17-0001)

SUMMARY- PLANNED COMMERCIAL/INDUSTRIAL PLAN APLICATION SUBMITTAL

On March 22, 2017, the Snoqualmie Mill Planned Commercial/Industrial (PCIP) Application was submitted to the City of Snoqualmie for evaluation, pursuant to SMC 14.30.040, which requires technical review and determination of completeness under permitting process requirements for the proposed project.

The subject PCIP Application is required under Subsection A.6 of the Pre-Annexation Agreement (PAA), which prohibits any new or additional site development in the Snoqualmie Mill Planning Area until the following is met: review of applicable Comprehensive Plan policies, approval of an Annexation Implementation Plan (AIP) and, for any development within the Planned Commercial Industrial Zone, a Planned Commercial Industrial Plan (PCIP) and associated environmental review under the State Environmental Policy Act (SEPA). The AIP, which also included a review of Comprehensive Plan criteria, for the proposed project was finalized in July, 2016 (Post Annexation Implementation Plan, prepared by Goldsmith) and approved by the City on November 28, 2016. City Council approval of the AIP was supported by City Planning Department Staff (October 13, 2016 Staff Report for Mill Site Annexation Implementation Plan).

In addition to making a determination of PCIP Application completeness, this memo: reviews the PCIP Application for consistency with the Pre-Annexation Agreement (October 24, 2011); the approved AIP (including conditions of approval); and, the Planned Commercial/Industrial Regulations of the Snoqualmie Municipal Code (SMC) 17.20. Review of SMC 17.20 consistency specifically considers:

- PCI District Zoning classification established by SMC 17.20.020(E);
- Planned commercial/industrial provisions of SMC 17.20.050; and
- Planned unit development permit submittal requirements under SMC 17.50.090.

Once determined complete by the Community Development Department, the PCIP application will be directed through a Type III permit process, requiring a recommendation from Planning Commission and approval from City Council.

DETERMINATION

Review of completeness for the Snoqualmie Mill Site PCIP Application has been completed consistent with the following SMC criteria:

14.30.050 Determination of completeness of application.

A. Within 28 days after receiving a project permit application, the director shall mail or provide in person a written determination to the applicant, stating either (i) that the application is complete, or (ii) that the application is incomplete and what is necessary to make the application complete. The determination shall also include, if feasible, a statement of the preliminary determination of the project permit application's consistency with development regulations and preliminary identification of the development regulations compliance with which may be determined to constitute compliance with SEPA.

B. A project permit application may be deemed complete for purposes of this section when it meets the submission requirements of other titles of this code and the additional requirements of SMC 14.30.030 and it is sufficient for continued processing, even though additional information may be required or project modifications may be undertaken subsequently.

C. A determination of completeness under this section shall not preclude the city from requesting additional information or studies either at the time of the notice of completeness or subsequently if new information is required or subsequent changes in the proposed project occur.

D. A project permit application shall be deemed complete if the director does not provide a written determination to the applicant that the application is incomplete under subsection (A) of this section.

E. Within 14 days after the applicant has submitted any additional information identified by the director as being necessary for a complete application, the director shall notify the applicant whether the application has been made complete or what additional information is necessary. (Ord. 768 § 2, 1996).

Based on review of the Snoqualmie Mill PCIP Application, the City has determined that the application is **generally complete**. That said, the PCIP Application is not to a scale that would contain sufficient detail to determine the proposed project's compliance with applicable development regulations. As discussed in the PCIP Application, the submittal is at the programmatic level "stipulating to the preparation and processing of an Environmental Impact Statement (EIS) where detailed design elements will be refined together with environmental mitigations."

The City requests the following additional items be provided to fulfill requirements for a programmatic level planned unit development (PUD) permit application. If the applicant believes that any of the following additional items are not appropriate for the programmatic level of the PCI Plan being considered, please provide rationale and a statement of anticipated completion during a future Mill Site development permit stage.

- Clear identification of anticipated deviations from PCI district development standards, including clear documentation that anticipated deviations would not require departure from standards necessary to protect health, safety or the environment.
- A written statement summarizing the anticipated timing of Mill Site development.
- Include a vicinity map that shows the land use and existing zoning of both the site and surrounding areas. SMC 17.50.090(B) (1)).
- Prepare a Traffic Impact Analysis (TIA) as a part of the EIS process. SMC 17.50.090(B) (2)(d)
- Include map that shows the existing and proposed pedestrian circulation system, including trails. SMC 17.50.090(B) (2)(e)).
- Add existing water lines, proposed utility systems of electric, gas and telephone. SMC 17.50.090(B) (2)(f)).
- Provide a landscape plan SMC 17.50.090(B) (2)(g)).
- Provide proposed treatment of the perimeter of the development, including materials and techniques used, such as screens, fences and/or walls. SMC 17.50.090(B) (2)(h)).
- Provide the proposed method of street lighting and signing SMC 17.50.090(B) (2)(i)).
- Provide the noise and lighting characteristics of the proposed development SMC 17.50.090(B) (2)(j)).
- Provide a written statement regarding the timing of development (SMC 17.50.090(B)(3)).
- The City requests that any anticipated need for clarification and or expansion of allowable recreational uses be provided as a supplement to the PCIP Application (A7. Annexation Agreement).
- Provide analysis of impacts of the Meadowbrook Bridge and Mill Pond Road (A13. Transfer of Infrastructure).
- Provide detailed options for fire suppression (B6. Annexation Agreement).

- Coordinate with the City and King County (Culture and Historic Preservation Office) for protection and potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures on the site (B8. Powerhouse).
- The PCIP Application should specifically address potential settlement risk within the site, which could potentially damage roadway and utilities. This content must "present a viable solution to be reviewed and approved by the City." (AIP Condition #2).

In addition, the City stipulates that additional technical review and planning will be required by the applicant during the permitting approval process and the environmental review (EIS) process. An initial list of elements that will require additional input is provided in the "CITY DIRECTION FOR ENVIRONMENTAL REVIEW (EIS)" section below.

INITIAL REVIEW OF APPLICABLE CRITERIA

SMC 17.20.050 Planned Commercial/Industrial Provisions

Review for the Planned Commercial/Industrial Application is considered relative to conformance with SMC 17.20.050, *Planned Commercial/Industrial Provisions*.

17.20.050 Planned commercial/industrial provisions.

A. The purpose of the planned commercial/industrial 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 two 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.***

The Snoqualmie Mill Planned Commercial/Industrial Plan seeks to develop 1.85 million square feet of commercial, industrial and related land uses over multiple phases. At a programmatic level, the development proposed by the Snoqualmie Mill PCIP application is consistent with the required purpose for planned commercial/industrial districts. During the SEPA process and subsequent permit approvals, the above purpose and objectives will be considered to ensure they are applied to the Snoqualmie Mill Site review.

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.

The parcels/lots will be owned by individual purchasers. A non-profit association of owners will be created to hold and maintain common open space, roads, utilities and other infrastructure.

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.

The project consists of a total of 260.9 acres. The smallest parcel is Parcel No. 3024089070 (2.17 acres).

D. In the event two or more contiguous parcels in common ownership lie in whole or part in both the planned commercial/industrial 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 may be included, provided they constitute no more than 15 percent of the total acreage of the proposal.

The existing proposal presents one plan (in phases) for all the parcels.

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

The proposed planned/commercial industrial district includes a mix of uses in each of the Planning Areas.

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.

The site is jointly owned by Snoqualmie Mill Venture and King County Parks. In 2015, King County purchased the parcels located on the easternmost portion of the Mill Planning Area for future uses, primarily regional trail connectivity.

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.

The project proposes a total of 58% open space, including natural features, open space, compensatory storage and developed landscape.

H. Proposed circulation, solid waste disposal and recycling, and water, sewer and storm water 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.

Detailed information and analysis regarding circulation, solid waste disposal and recycling, and water, sewer and storm water management systems will be analyzed as part of the SEPA review.

I. It is the intention of this section to encourage development proposals not constrained by fixed development standards, and toward that end, deviation from development standards of general applicability throughout the city may be authorized when the city council, with the advice of the planning commission, finds that such deviation would advance the purpose of the district as set forth in subsection A of this section, provided deviation shall not be allowed from development standards deemed necessary to protect health, safety or the environment. Any such deviations shall be included in the approved plan for the planned commercial/industrial development.

No detail on proposed deviations from development standards, as necessary to advance the purpose of the planned commercial/industrial district, are provided in the Snoqualmie Mill PCIP application.

The PCIP Application must be supplemented with clear identification of anticipated deviations from district development standards, including clear documentation that anticipated deviations would not require departure from standards necessary to protect health, safety or the environment.

J. 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.

The application includes all materials required under SMC 17.50.090(B) at the programmatic level (as detailed below). The PCIP Application is stipulating to the preparation of an Environmental Impact Statement (EIS); specific environmental elements where the City will require additional technical analysis and planning to support the Draft EIS and PCIP approval are provided in the "CITY DIRECTION FOR ENVIRONMENTAL REVIEW (EIS)" section below.

K. 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. (Ord. 980 § 4, 2005; Ord. 933 § 2, 2003; Ord. 769 § 24, 1996; Ord. 744 § 2, 1995).

SMC 17.50.090 Planned unit development permit

The following review for the Snoqualmie Mill PCIP Application includes verification that all application materials are provided as listed in SMC 17.50.090(B), as required by SMC 17.20.050(J).

SMC 17.50.090(B) All applications shall include the following:

1. ***Vicinity map showing the location of the site and its relationship to surrounding areas, including the land use, natural features and zoning of both the site and the surrounding areas;***
    - Vicinity map is included on the cover page.
    - Existing zoning listed on cover page under "Project Information"
    - Existing land uses not present on any site plans. However, included in the narrative.
    - EX-1 "Existing Conditions" and SD-1 "Overall Stormwater Plan" shows natural features.

2. ***A map of the site drawn to a scale of not less than one inch equaling 100 feet showing the following:***
    a. ***The existing site conditions, including contours at five foot intervals, water bodies, unique natural features, and forest cover,***
    - Existing site conditions are included on sheet "EX-1"
    - Contour lines appear to be at two foot intervals, not five.

    b. ***The location and floor area size of all existing and proposed buildings, structures, and other improvements, including maximum heights, types of dwelling units, density per type, and nonresidential structures. Such drawings should be sufficient to convey the basic exterior architectural intent of the proposed improvements,***
    - SP-1 includes floor area size of proposed but not existing; includes structures and other improvements. However, a narrative of the existing site condition, structures and uses is included in the Application documents submitted concurrently with the maps.
    - Does not include heights of proposed structures. There are no elevation drawings at this time, please include elevation drawings when available.

    c. ***The location and size in acres or square feet of all areas to be conveyed, dedicated or reserved as common open spaces, public parks, recreational areas, and similar public or semi-public uses,***

This information is included in sheet "SP-1"

d. ***The existing and proposed circulation system of arterial, collector, and local streets, including off-street parking, service, loading areas, and major points of access to public rights-of-way. Notations of proposed ownership, private or public, should be included where appropriate,***

SP-1 includes a depiction of this information. A Traffic Impact Analysis (TIA) will be prepared and included as part of the EIS.

e. ***The existing and proposed pedestrian circulation system, including trails,***

SP-1 includes the proposed trail system, but does not provide details about other pedestrian amenities.

f. ***The existing and proposed utility systems, including sanitary sewers, storm sewers, water, electric, gas and telephone,***

SD-1 "Overall Stormwater Plan," and WS-1 "Overall Water and Sanitary Sewer Plan" include the proposed storm and sanitary systems, as well as the proposed water distribution system. Recommend adding the existing water lines. Proposed utility systems of electric, gas and telephone not included.

g. ***A landscape plan in general schematic form indicating treatment of open space and yards,***

Landscape areas are identified in SP-1 but a planting plan is not included at this time.

h. ***The proposed treatment of the perimeter of the development, including materials and techniques used, such as screens, fences and walls,***

Applicant to provide details on treatment of the perimeter of the development.

i. ***The proposed method of street lighting and signing,***

Applicant to provide details on street lighting and signing.

j. ***The noise and lighting characteristics of the proposed development;***

Applicant to provide additional details on noise and lighting characteristics.

3. ***In addition to the graphic illustrations listed above, the applicant shall submit a written statement providing the following information:***

a. ***Program for development including staging or timing of development, if any,***

There is currently no written statement regarding the timing of development.

b. ***Proposed ownership pattern upon completion of the project,***

Upon completion of the project, the parcels/lots will be owned by individual purchasers. A non-profit association of owners will be created to hold and maintain common open space, roads, utilities and other infrastructure.

c. ***Basic content of any restrictive covenants,***

Pursuant to RCW 36.70B.170, a covenants, conditions and restrictions (CC&Rs) will be developed by the applicant and will apply to all the development parcels within the site. Additionally, the applicant will create a non-profit property owners' association which will be responsible for maintenance of dedicated open space, roads, utilities and other site infrastructure.

d. Provisions to assure permanence and maintenance of common open space through a homeowners association, or similar association, condominium development, or other means acceptable to the city;

Included in Pre-Annexation Agreement, the AIP, and addressed below in *Consistency of PCIP Submittal with Annexation Agreement and AIP Requirements and Conditions of Approval.*

4. An application for preliminary plat may be submitted with the development application, if necessary. Fees for the subdivision shall be in addition to those of the development application.

A Preliminary Plat Application is not anticipated as a part of this PCIP Application. However, a Lot Line Adjustment (LLA) is included, defining the potential creation of the future legal lots and development permitting associated with the multiple phases of development within Planning Areas 1 through 3.

Consistency of PCIP Application with Annexation Agreement and AIP Requirements and Conditions of Approval

A2. Zoning. Upon the effective date of the annexation ordinance, the portion of the Annexation Area located outside of the 100 year floodway as depicted on the most recent FEMA Flood Insurance Rate Maps on file with the City of Snoqualmie shall be subject to the Planned Commercial Industrial (PCI) District Regulations of Section 17.250.050 SMC; the portion of the Annexation Area located north and east of S.E. Mill Pond Road and within the 100 year floodway as depicted on the FEMA Flood Pre-Annexation Agreement Page 4 of 16 Insurance Rate Maps shall be subject to the Open Space 2 (OS-2) District Regulations of Section 17.25.050 SMC; the portion of the Annexation Area located south and west of S.E. Mill Pond Road shall be subject to the Open Space 1 (OS-1) District Regulations of Section 17.25.050 SMC; and the portion of the Annexation Area located east of parcel 2924089028 and east of a line extended southward from the SE corner of said parcel to connect with the western point of the UGA line on the north boundary of parcel 2924089017 shall be subject to the Planned Residential District Regulations of Section 17.15.050.

Complete. Add the revised FIRM to Sheet EX-1, as well as existing zoning designations (as discussed above). The north boundary of parcel 2924089017, to the south of the project site, is not a part of the proposed project review.

A3. Shoreline Environment Designations. Upon the effective date of the annexation ordinance, the City will commence the process required to designate that portion of the Annexation Area within the floodway of the Snoqualmie River and north and east of S.E. Mill Pond Road as Conservancy Shoreline Environment; that portion of the Annexation Area within the 100-year floodway as depicted on the most recent FEMA Flood Insurance Rate Maps on file with the City and located south and west of S.E. Mill Pond Road as Natural Shoreline Environment; and that portion of the Annexation Area within the floodplain of the Snoqualmie River but outside of the floodway as Urban Floodplain Environment, to become effective upon approval by the Washington State Department of Ecology.

Similar to A2, add the revised FIRM to Sheet EX-1.

A6. Site Development. The City will not approve any new or additional site development until review of applicable Comprehensive Plan policies, approval of an Annexation Implementation Plan and, for any

development within the PCI zone, a Planned Commercial Industrial Plan, and for any development in the PR zone a Planned Residential Plan, and associated environmental review under the State Environmental Policy Act have been completed.

The subject application is the Planned Commercial/Industrial Application plan at the programmatic level and is in compliance this requirement for site development.

A7. Amendment to Allowable Uses. Upon annexation, the City will present amendments to the allowable uses table in section 17.55.020 of the Snoqualmie Municipal Code in the Planned Commercial / Industrial and the Open Space 2 Districts to the Planning Commission and City Council for their consideration as may be requested by SMV and WREDCo to clarify and/or expand allowable recreational uses both within and without buildings.

At this time, there is no request to expand allowable recreational uses.

A13. Transfer of Infrastructure. Meadowbrook Bridge and Mill Pond Road constitute infrastructure which will be transferred from King County to the City a result of the annexation. SMV and WREDCo acknowledge that they will be required to analyze impacts of the Meadowbrook Bridge and Mill pond Road of any proposed future development or redevelopment.

Not included in application. The applicant must provide analysis of impacts of the Meadowbrook Bridge and Mill Pond Road.

A14. Snoqualmie Valley Trail. SMV and/or WREDCo will dedicate property to the City of Snoqualmie for the Snoqualmie Valley Trail in a location to be mutually agreed upon by the City and the record owner(s) of the property. The City will consult with the King County Parks Department regarding location and right-of-way requirements.

B4. Sensitive Areas Study. Within thirty (30) days after the effective date of annexation, SMV shall provide the City with a sensitive areas study for City review and approval to ensure that all aspects of the operation of the specialized driving instruction school and any special events comply with the requirements of chapter 19.12 of the Snoqualmie Municipal Code. Conditions imposed on operation of the specialized driving instruction school by the City as a result of the sensitive areas study shall be deemed to be conditions of the business license of the specialized driving instruction school and any temporary use permit / special event permit. The business license for the specialized driving instruction school may be revoked, and any temporary use permit / special event permit for any special event may be revoked, for violation of such conditions in the conduct of the specialized driving instruction school or the special event.

A Sensitive Areas Study was submitted to the City on October 25, 2012; and an updated Sensitive Areas Study was submitted to the City on June 24, 2016.

B5. Water and Sewer. The City will continue to provide domestic water and sewer service to the existing office building. Any expansion of service is subject to completing planning under the comprehensive plan annexation policies and approval of a Planned Commercial Industrial Plan pursuant to SMC 17.20.050. SMV acknowledges that fire suppression facilities serving its property may not be adequate. The City and SMV will explore options for fire suppressions.

The applicant provided a water system capacity analysis (2015) discussion with the PCIP Application. However, detailed options for fire suppression was not provided.

B6. Uses Permitted Prior to Approval of Planned Commercial Industrial Plan or Planned Residential Plan. SMV agrees that it will limit development activity on the site to repairing and maintaining the uses described in Section A.4.2 until the City has issued the approvals required by Section A.6. It will not construct additional permanent facilities or seek other development of the SMV Property, except in

accordance with Section A.6, provided, facilities required for special events may be permitted as provided in Section B.3.

This Annexation Agreement condition is not applicable to the PCIP Application.

B8. Powerhouse. SMV agrees to coordinate with the City and King County (Culture and Historic Preservation Office) for protection and potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures on the site. These structures are a designated King County Landmark and are included on the Most Endangered Historic Properties list maintained by the Washington Trust for Historic Preservation.

As part of the cultural resource procedures for structures that are designated King County Landmarks, the applicant would be required to comply with King County Code Chapter 20.62, which states that development proposals for projects on or adjacent to a resource listed on the Historic Resource Inventory (HRI) be reviewed by the King County HPO prior to approval.

AIP Condition #2: The applicant shall address potential settlement risk in the PCIP, which could potentially damage roadway and utilities, by presenting a viable solution to be reviewed and approved by the City as part of the PCIP review.

The PCIP Application does not specifically address potential settlement risk within the site; AIP Condition #2 is not yet met.

City Direction for Environmental Review (EIS)

The City (EIS lead agency) has identified the following environmental elements for detailed discussion in the EIS. Environmental elements where the City will require additional technical review and studies to support EIS impacts analysis are noted, including additional input provided by review comments from Perteet (Snoqualmie Mill PCI Plan Application Review Comments, dated April 4, 2017).

- Earth (geology, seismic hazards): The City will require the applicant to provide geotechnical analysis evaluating site conditions, including assessment of site settlement potential (consistent with Condition #2 of the AIP) to support the EIS.
- Air quality (emissions, including greenhouse gases [GHG]): The City will require that the applicant complete an Air Quality and GHG Technical Report to support the EIS, including review of construction impacts and analysis of vehicle tailpipe emissions coordinated with the TIA.
- Surface and storm water (quantity and quality): Technical evaluation of surface / stormwater and development consistency with surface water management standards must be provided in the EIS. Evaluation must assess potential impacts and consistency with the Review Memorandum from Perteet (April 4, 2017 memo), future comments provided by NHC, and all other applicable City Surface Water Management regulations.
- Plants & animals (wetlands, streams, wildlife habitat and fisheries): Documentation of existing conditions and impacts to plants & animals should be provided as an updated Critical Areas Report consistent with City CAO and SMP requirements; assessment of impacts must be accompanied by mitigation measures (conceptual mitigation) that meets CAO and SMP requirements and that presents an approach that will meet permit requirements for other State and Federal wetland, stream, and wildlife habitat / fisheries resources protections.
- Environmental health (noise, site contamination): The City will require the applicant to complete a technical evaluation of known site contamination and clean-up. For new roadways, the City will require the applicant to complete a Noise Technical Report consistent with FHWA and WSDOT noise impacts evaluation procedures.
- Flood hazards: Technical evaluation of flood hazards and development approach consistency with floodplain development standards must be provided in the EIS. Evaluation must assess potential

impacts and consistency with the Review Memorandum from Perteet (April 4, 2017 memo) and all other applicable City Flood Hazard Regulations.

- Land and shoreline use (land use patterns, and consistency with plans and policies): Analysis of proposed land uses, consistency and relationship with all applicable City plans, polices, and requirements, and analysis of jobs and housing associated with proposed land uses. The City will additionally require review of consistency with the updated SMP (adoption anticipated Summer 2017) and associated shoreline designations and standards.
- Historic and cultural resources (impacts to known and potential archaeological and historic resources): The City will require the applicant to complete cultural resources assessment consistent with DAHP requirements to support the EIS.
- Aesthetics: The applicant will be required to provide additional details on lighting characteristics and impacts to views and adjacent uses during development and completion of the Draft EIS. This must include proposed treatment of the perimeter of the development and distinct uses within the Mill Site development, including materials and techniques used, such as screens, fences and/or walls.
- Transportation: The applicant will be required to complete a Traffic Impact Analysis (TIA) to support the EIS. As part of the TIA, additional details on impacts to Meadowbrook Bridge and Mill Pond Road will be included. Transportation analysis should also include assessment of proposed land uses and parking requirements consistent with City standards.
- Public services (police, fire, schools, parks and recreation/trails): The applicant must complete technical analysis supporting evaluation of utility availability and necessary utility system improvements for all "Build" alternatives within the EIS.
- Utilities (sewer, water): The applicant must complete technical analysis supporting evaluation of utility availability and necessary utility system improvements for all "Build" alternatives within the EIS. Evaluation must include detailed options for fire suppression sufficiency.

The applicant has completed the required pre-application requirements contained in SMC. Therefore, pursuant to SMC Sections 14.30.040 and 14.30.050, the City has determined that the Snoqualmie Mill PCIP Application is **generally complete**. City staff will now move toward preparing and executing a proper notice of application and scoping for the stipulated EIS. The applicant is required to fulfill the above mentioned additional items identified in this review; as well as any items that are not presently identified as part of this review, but are required during the permitting and environmental review process.

Mark Hofman — 4/19/17

Mark Hofman
Community Development Director
City of Snoqualmie

Date: April 19, 2017

GOLDSMITH
LAND DEVELOPMENT SERVICES

January 14, 2022

City of Snoqualmie Planning Department
38624 SE River Street
Snoqualmie, WA 98065

Attention: Jason Rogers, Interim Community Development Director

Re: Snoqualmie Mill PCI Application (PCI17-0001) - Response to Comments

Dear Jason,

As part of the 2022 Snoqualmie Mill Planned Commercial / Industrial Plan (PCI) Application Update, this letter provides our response to comments on the letter of PCI Application Completeness by the then Director, Mark Hoffman, dated April 4, 2017. The following identifies (in bold) how the Application Update addresses each comment (in italics) from that review letter.

DETERMINATION of Completeness:

*Based on review of the Snoqualmie Mill PCIP Application, the City has determined that the application is **generally complete**.*

The City requests the following additional items be provided to fulfill requirements for a programmatic level planned unit development (PUD) permit application. If the applicant believes that any of the following additional items are not appropriate for the programmatic level of the PCI Plan being considered, please provide rationale and a statement of anticipated completion during a future Mill Site development permit stage.

- *Clear identification of anticipated deviations from PCI district development standards, including clear documentation that anticipated deviations would not require departure from standards necessary to protect health, safety or the environment.*

  Deviation requests from PCI District development standards are provided in Section V of the PCIP Application UPDATE submitted herewith, dated January 2022.

- *A written statement summarizing the anticipated timing of Mill Site development.*

  As described in the Snoqualmie Mill PCIP EIS ("EIS"), development within the Snoqualmie Mill project is identified within three (3) Planning Areas. Development is anticipated to occur over approximately a 10-15 year period. A buildout horizon year for Planning Area 1 was identified in the EIS. Planning Area 1 is anticipated to be completed as one infrastructure project, followed by multiple building permits.

11400 SE 8th St, Suite 450, Bellevue, WA 98004
PO Box 3565, Bellevue, WA 98009 **T**: 425.462.1080 |**F**: 425.462.7719 www.goldsmithengineering.com

The remaining comments shown below, are addressed under the header INTIAL REVIEW OF APPLICABLE CRITERIA, SMC 17.50.090 – Planned unit development permit, beginning on page 5 of 10) in the City's Determination of Completeness Application Review letter dated April 4, 2017. See Section SMC 17.050.090 further below on this page.

- *Include a vicinity map that shows the land use and existing zoning of both the site and surrounding areas. SMC 17.50.090(B) (1)).*
- *Prepare a Traffic Impact Analysis (TIA) as a part of the EIS process. SMC 17.50.090(B) (2)(d)*
- *Include map that shows the existing and proposed pedestrian circulation system, including trails. SMC 17.50.090(B) (2)(e)).*
- *Add existing water lines, proposed utility systems of electric, gas and telephone. SMC 17.50.090(B) (2)(f)).*
- *Provide a landscape plan SMC 17.50.090(B) (2)(g)).*
- *Provide proposed treatment of the perimeter of the development, including materials and techniques used, such as screens, fences and/or walls. SMC 17.50.090(B) (2)(h)).*
- *Provide the proposed method of street lighting and signing SMC 17.50.090(B) (2)(i)).*
- *Provide the noise and lighting characteristics of the proposed development SMC 17.50.090(B) (2)(j)).*
- *Provide a written statement regarding the timing of development (SMC 17.50.090(B)(3)).*
- *The City requests that any anticipated need for clarification and or expansion of allowable recreational uses be provided as a supplement to the PCIP Application (A7. Annexation Agreement).*
- *Provide analysis of impacts of the Meadowbrook Bridge and Mill Pond Road (A13. Transfer of Infrastructure).*
- *Provide detailed options for fire suppression (B6. Annexation Agreement).*
- *Coordinate with the City and King County (Culture and Historic Preservation Office) for protection and potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures on the site (B8. Powerhouse).*
- *The PCIP Application should specifically address potential settlement risk within the site, which could potentially damage roadway and utilities. This content must "present a viable solution to be reviewed and approved by the City." (AIP Condition #2).*

SMC 17.50.090 Planned unit development permit:

The following review for the Snoqualmie Mill PCIP Application includes verification that all application materials are provided as listed in SMC 17.50.090(B), as required by SMC 17.20.050(J).

SMC 17.50.090(B) All applications shall include the following:

1. *Vicinity map showing the location of the site and its relationship to surrounding areas, including the land use, natural features and zoning of both the site and the surrounding areas; ○ Vicinity map is included on the cover page. ○ Existing zoning listed on cover page under "Project Information" ○ Existing land uses not present on any site plans. However, included in the narrative. ○ EX-1 "Existing Conditions" and SD-1 "Overall Stormwater Plan" shows natural features.*

   The PCIP plan set has been refined and revised and added to in the Application UPDATE (UPDATE). Features described above are shown on the UPDATED plans or included in the application narrative.

2. *A map of the site drawn to a scale of not less than one inch equaling 100 feet showing the following:*
   a. *The existing site conditions, including contours at five foot intervals, water bodies, unique natural features, and forest cover, ○ Existing site conditions are included on sheet "EX-1" ○ Contour lines appear to be at two foot intervals, not five.*

      The PCIP plan set has been refined and revised and added to the Application UPDATE (UPDATE). Features described above are shown on the plans on PCIP Plan Sheets EX-1 and EX-2.

   b. *The location and floor area size of all existing and proposed buildings, structures, and other improvements, including maximum heights, types of dwelling units, density per type, and nonresidential structures. Such drawings should be sufficient to convey the basic exterior architectural intent of the proposed improvements,*
      - *SP-1 includes floor area size of proposed but not existing; includes structures and other improvements. However, a narrative of the existing site condition, structures and uses is included in the Application documents submitted concurrently with the maps.*
      - *Does not include heights of proposed structures. There are no elevation drawings at this time, please include elevation drawings when available.*

      The PCI plan set has been refined and revised and added to the Application UPDATE (UPDATE). Features described above are shown on the plans or included in the application narrative.

   c. *The location and size in acres or square feet of all areas to be conveyed, dedicated or reserved as common open spaces, public parks, recreational areas, and similar public or semi-public uses,*

      This information is included in sheet "SP-1"

      The PCIP plan set has been refined and revised and added to the Application UPDATE (UPDATE). Features described above are shown on the plans or included in the application narrative.

   d. *The existing and proposed circulation system of arterial, collector, and local streets, including offstreet parking, service, loading areas, and major points of access to public rights-of-way. Notations of proposed ownership, private or public, should be included where appropriate,*

SP-1 includes a depiction of this information. A Traffic Impact Analysis (TIA) will be prepared and included as part of the EIS.

The PCIP plan set has been refined and revised and added to the Application UPDATE (UPDATE). Features described above are shown on the plans or included in the application narrative.

e. *The existing and proposed pedestrian circulation system, including trails,*

SP-1 includes the proposed trail system, but does not provide details about other pedestrian amenities.

The PCIP plan set has been refined and revised and added to in the Application UPDATE (UPDATE). Features described above are shown on the plans or included in the narrative.

Additional landscape and trail concepts have been included from the EIS and are shown on PCIP Plan Sheets SP-3, SP-4, CA-1, and LS-1.

f. *The existing and proposed utility systems, including sanitary sewers, storm sewers, water, electric, gas and telephone,*

SD-1 "Overall Stormwater Plan," and WS-1 "Overall Water and Sanitary Sewer Plan" include the proposed storm and sanitary systems, as well as the proposed water distribution system. Recommend adding the existing water lines. Proposed utility systems of electric, gas and telephone not included.

Existing water lines and sewer mains have been added to PCIP Plan Sheets WS-1 and WS-2 in the Application UPDATE. Other utility systems will be evaluated and shown on future infrastructure Site Development Plan (SDP) plans.

g. *A landscape plan in general schematic form indicating treatment of open space and yards.*

Landscape areas are identified in SP-1, but a planting plan is not included at this time.

The PCIP plan set has been refined and revised and added to in the Application UPDATE (UPDATE). Features described above are shown on the plans or included in the narrative.

Additional landscape and trail concepts have been included from the EIS and are shown on PCIP Plan Sheets SP-3, SP-4, CA-1 and LS-1. There is no specific planting plan provided at this planning level for the PCIP application.

h. *The proposed treatment of the perimeter of the development, including materials and techniques used, such as screens, fences and walls,*
Applicant to provide details on treatment of the perimeter of the development.

Landscape concepts developed as part of the EIS have been included in the UPDATE of the PCIP Plans. There is no fencing proposed as part of the PCIP at this time.

No treatment of the perimeter is proposed unless it is enhancement for wetland mitigation / replacement.

i. *The proposed method of street lighting and signing,*
Applicant to provide details on street lighting and signing.

Definitive proposals for street lighting and signage have not been developed at the PCIP application stage. It is anticipated that a site wide street lighting and signage program will be prepared concurrent with site development and engineering.

j. *The noise and lighting characteristics of the proposed development; Applicant to provide additional details on noise and lighting characteristics.*

These were addressed in the project DEIS Chapters 3.9 and 3.12 .

3. *In addition to the graphic illustrations listed above, the applicant shall submit a written statement providing the following information:*
   a. *Program for development including staging or timing of development, if any,*

There is currently no written statement regarding the timing of development.
As described in the Snoqualmie Mill PCIP Plan EIS ("EIS"), development within the Snoqualmie Mill project is identified within three (3) Planning Areas. Development is anticipated to occur over approximately a 10–15-year period. A buildout horizon year for Planning Area 1 was identified in the EIS. Planning Area 1 is anticipated to be completed as one infrastructure project, followed by multiple building permits.

Development of the site would occur in three distinct areas, over an approximate 10-to-15-year period. Each planning area is equivalent to a phase of development and could be developed in two or more sub-phases. Planning Area 1/Phase I is assumed to be completed by 2023; Planning Area 2/Phase 2 completed by 2026; and buildout of Planning Area 3/Phase 3 by 2032. Construction of each phase is estimated to take approximately two years. Development timing will depend on market and economic conditions and infrastructure requirements and is less certain for Planning Areas 2 and 3.

   b. *Proposed ownership pattern upon completion of the project,*

Upon completion of the project, the parcels/lots will be owned by individual purchasers. A non-profit association of owners will be created to hold and maintain common open space, roads, utilities and other infrastructure.

The Applicant agrees with the City Reviewer's response above.

   c. *Basic content of any restrictive covenants,*

Pursuant to RCW 36.70B.170, a covenants, conditions and restrictions (CC&Rs) will be developed by the applicant and will apply to all the development parcels within the site. Additionally, the applicant will create a non-profit property owners' association which will be responsible for maintenance of dedicated open space, roads, utilities and other site infrastructure.

The Applicant agrees with the City Reviewer's response above.

d. *Provisions to assure permanence and maintenance of common open space through a homeowner's association, or similar association, condominium development, or other means acceptable to the city;*

Included in Pre-Annexation Agreement, the AIP, and addressed below in Consistency of PCIP Submittal with Annexation Agreement and AIP Requirements and Conditions of Approval.

The Applicant agrees with the City Reviewer's response above.

4. *An application for preliminary plat may be submitted with the development application, if necessary. Fees for the subdivision shall be in addition to those of the development application.*

A Preliminary Plat Application is not anticipated as a part of this PCIP Application. However, a Lot Line Adjustment (LLA) is included, defining the potential creation of the future legal lots and development permitting associated with the multiple phases of development within Planning Areas 1 through 3.

The Applicant agrees with the City Reviewer's response above.

Consistency of PCIP Application with Annexation Agreement and AIP Requirements and Conditions of Approval

A2. Zoning. Upon the effective date of the annexation ordinance, the portion of the Annexation Area located outside of the 100 year floodway as depicted on the most recent FEMA Flood Insurance Rate Maps on file with the City of Snoqualmie shall be subject to the Planned Commercial Industrial (PCI) District Regulations of Section 17.250.050 SMC; the portion of the Annexation Area located north and east of S.E. Mill Pond Road and within the 100 year floodway as depicted on the FEMA Flood Pre-Annexation Agreement Page 4 of 16 Insurance Rate Maps shall be subject to the Open Space 2 (OS-2) District Regulations of Section 17.25.050
SMC; the portion of the Annexation Area located south and west of S.E. Mill Pond Road shall be subject to the Open Space 1 (OS-1) District Regulations of Section 17.25.050 SMC; and the portion of the Annexation Area located east of parcel 2924089028 and east of a line extended southward from the SE corner of said parcel to connect with the western point of the UGA line on the north boundary of parcel 2924089017 shall be subject to the Planned Residential District Regulations of Section 17.15.050.

Complete. Add the revised FIRM to Sheet EX-1, as well as existing zoning designations (as discussed above). The north boundary of parcel 2924089017, to the south of the project site, is not a part of the proposed project review.

The revised FIRM cross sections (August 2020) have been included on the UPDATED PCIP Plan Sheet EX-2 in the UPDATE.

A3. Shoreline Environment Designations. Upon the effective date of the annexation ordinance, the City will commence the process required to designate that portion of the Annexation Area within the floodway of the Snoqualmie River and north and east of S.E. Mill Pond Road as Conservancy Shoreline Environment; that portion of the Annexation Area within the 100-year floodway as depicted on the most recent FEMA Flood Insurance Rate Maps on file with the City and located south and west of S.E. Mill Pond Road as Natural

Shoreline Environment; and that portion of the Annexation Area within the floodplain of the Snoqualmie River but outside of the floodway as Urban Floodplain Environment, to become effective upon approval by the Washington State Department of Ecology.

Similar to A2, add the revised FIRM to Sheet EX-1.

The Shoreline Designations have been added to the PCIP Plan Sheet EX-2 in the UPDATE.

A6. Site Development. The City will not approve any new or additional site development until review of applicable Comprehensive Plan policies, approval of an Annexation Implementation Plan and, for any development within the PCI zone, a Planned Commercial Industrial Plan, and for any development in the PR zone a Planned Residential Plan, and associated environmental review under the State Environmental Policy Act have been completed.

The subject application is the Planned Commercial/Industrial Application plan at the programmatic level and is in compliance this requirement for site development.

Acknowledged.

A7. Amendment to Allowable Uses. Upon annexation, the City will present amendments to the allowable uses table in section 17.55.020 of the Snoqualmie Municipal Code in the Planned Commercial / Industrial and the Open Space 2 Districts to the Planning Commission and City Council for their consideration as may be requested by SMV and WREDCo to clarify and/or expand allowable recreational uses both within and without buildings.

At this time, there is no request to expand allowable recreational uses.

Acknowledged / Confirmed.

A13. Transfer of Infrastructure. Meadowbrook Bridge and Mill Pond Road constitute infrastructure which will be transferred from King County to the City a result of the annexation. SMV and WREDCo acknowledge that they will be required to analyze impacts of the Meadowbrook Bridge and Mill pond Road of any proposed future development or redevelopment.

Not included in application. The applicant must provide analysis of impacts of the Meadowbrook Bridge and Mill Pond Road.

The Snoqualmie Mill EIS addresses proposed development to Meadowbrook Bridge and Mill Pond Road in DEIS Section 3.11. and Appendix F (Transportation).

A14. Snoqualmie Valley Trail. SMV and/or WREDCo will dedicate property to the City of Snoqualmie for the Snoqualmie Valley Trail in a location to be mutually agreed upon by the City and the record owner(s) of the property. The City will consult with the King County Parks Department regarding location and right-of-way requirements.

This has been completed.

B4. Sensitive Areas Study. Within thirty (30) days after the effective date of annexation, SMV shall provide the City with a sensitive areas study for City review and approval to ensure that all aspects of the operation

of the specialized driving instruction school and any special events comply with the requirements of chapter 19.12 of the Snoqualmie Municipal Code. Conditions imposed on operation of the specialized driving instruction school by the City as a result of the sensitive areas study shall be deemed to be conditions of the business license of the specialized driving instruction school and any temporary use permit / special event permit. The business license for the specialized driving instruction school may be revoked, and any temporary use permit / special event permit for any special event may be revoked, for violation of such conditions in the conduct of the specialized driving instruction school or the special event.

A Sensitive Areas Study was submitted to the City on October 25, 2012; and an updated Sensitive Areas Study was submitted to the City on June 24, 2016.

Acknowledged / Confirmed.

B5. Water and Sewer. The City will continue to provide domestic water and sewer service to the existing office building. Any expansion of service is subject to completing planning under the comprehensive plan annexation policies and approval of a Planned Commercial Industrial Plan pursuant to SMC 17.20.050. SMV acknowledges that fire suppression facilities serving its property may not be adequate. The City and SMV will explore options for fire suppressions.

The applicant provided a water system capacity analysis (2015) discussion with the PCIP Application. However, detailed options for fire suppression were not provided.

Water service analysis for Snoqualmie Mill is now provided within the City's Draft 2021 Water System Plan (WSP). Service is to be provided by capital improvement WM-12 called Mill Site WM Loop. The loop is required for full buildout of the PCIP development. It has been confirmed through the review of the EIS that Planning Area 1 development can be served by the extension from the 599 Zone main in Reinig Road but does not require the looped connection to SR-202.

B6. Uses Permitted Prior to Approval of Planned Commercial Industrial Plan or Planned Residential Plan. SMV agrees that it will limit development activity on the site to repairing and maintaining the uses described in Section A.4.2 until the City has issued the approvals required by Section A.6. It will not construct additional permanent facilities or seek other development of the SMV Property, except in accordance with Section A.6, provided, facilities required for special events may be permitted as provided in Section B.3.

This Annexation Agreement condition is not applicable to the PCIP Application.

Acknowledged.

B8. Powerhouse. SMV agrees to coordinate with the City and King County (Culture and Historic Preservation Office) for protection and potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures on the site. These structures are a designated King County Landmark and are included on the Most Endangered Historic Properties list maintained by the Washington Trust for Historic Preservation.

As part of the cultural resource procedures for structures that are designated King County Landmarks, the applicant would be required to comply with King County Code Chapter 20.62, which states that development proposals for projects on or adjacent to a resource listed on the Historic Resource Inventory (HRI) be reviewed by the King County HPO prior to approval.

Acknowledged.

AIP Condition #2: The applicant shall address potential settlement risk in the PCIP, which could potentially damage roadway and utilities, by presenting a viable solution to be reviewed and approved by the City as part of the PCIP review.

The PCIP Application does not specifically address potential settlement risk within the site; AIP Condition #2 is not yet met.

The project DEIS and Appendix B geotechnical reports address these issues. The reports provide evaluation of soils and recommendations for subgrade preparation and recommendations for factors of safety added to minimum slopes of gravity utilities.

In addition, the City stipulates that additional technical review and planning will be required by the applicant during the permitting approval process and the environmental review (EIS) process. An initial list of elements that will require additional input is provided in the "CITY DIRECTION FOR ENVIRONMENTAL REVIEW (EIS)" section below.

City Direction for Environmental Review (EIS)

The City (EIS lead agency) has identified the following environmental elements for detailed discussion in the EIS. Environmental elements where the City will require additional technical review and studies to support EIS impacts analysis are noted, including additional input provided by review comments from Perteet (Snoqualmie Mill PCI Plan Application Review Comments, dated April 4, 2017).

The City of Snoqualmie, lead SEPA Agency, followed the procedures for phased environmental review, as authorized by the SEPA Rules (WAC 197-11-060(5), SMC 19.04.020) for preparation and publication of the Snoqualmie Mill PCI Plan Draft Environmental Impact Statement (DEIS)(April 2020) and the Final Environmental Impact Statement (FEIS) (December 9, 2021).

Responses to City comments pertaining to the elements of the Snoqualmie Mill PCI Plan EIS are provided below, with references to the appropriate corresponding EIS sections and supporting technical appendices.

- *Earth (geology, seismic hazards): The City will require the applicant to provide geotechnical analysis evaluating site conditions, including assessment of site settlement potential (consistent with Condition #2 of the AIP) to support the EIS.*

  See DEIS Section 3.2 and Appendix B.

- *Air quality (emissions, including greenhouse gases [GHG]): The City will require that the applicant complete an Air Quality and GHG Technical Report to support the EIS, including review of construction impacts and analysis of vehicle tailpipe emissions coordinated with the TIA.*

  See DEIS Section 3.2 and Appendix A.

- *Surface and storm water (quantity and quality): Technical evaluation of surface / stormwater and*

development consistency with surface water management standards must be provided in the EIS. Evaluation must assess potential impacts and consistency with the Review Memorandum from Perteet (April 4, 2017 memo), future comments provided by NHC, and all other applicable City Surface Water Management regulations.

See DEIS Section 3.3 and Appendix A Sections 3 through 8.

- *Plants & animals (wetlands, streams, wildlife habitat and fisheries): Documentation of existing conditions and impacts to plants & animals should be provided as an updated Critical Areas Report consistent with City CAO and SMP requirements; assessment of impacts must be accompanied by mitigation measures (conceptual mitigation) that meets CAO and SMP requirements and that presents an approach that will meet permit requirements for other State and Federal wetland, stream, and wildlife habitat / fisheries resources protections.*

  See DEIS Section 3.4 and Appendix C .

- *Environmental health (noise, site contamination): The City will require the applicant to complete a technical evaluation of known site contamination and clean-up. For new roadways, the City will require the applicant to complete a Noise Technical Report consistent with FHWA and WSDOT noise impacts evaluation procedures.*

  See DEIS Section 3.5 and Appendix D.

- *Flood hazards: Technical evaluation of flood hazards and development approach consistency with floodplain development standards must be provided in the EIS. Evaluation must assess potential impacts and consistency with the Review Memorandum from Perteet (April 4, 2017 memo) and all other applicable City Flood Hazard Regulations.*

  See DEIS Section 3.4 and Appendix A, Sections 3 through 8.

- *Land and shoreline use (land use patterns, and consistency with plans and policies): Analysis of proposed land uses, consistency and relationship with all applicable City plans, polices, and requirements, and analysis of jobs and housing associated with proposed land uses. The City will additionally require review of consistency with the updated SMP (adoption anticipated Summer 2017) and associated shoreline designations and standards.*

  See DEIS Sections 3.7 and 3.8 and Appendix A. Shoreline environs are added to PCIP Plan Sheet EX-2.

- *Historic and cultural resources (impacts to known and potential archaeological and historic resources): The City will require the applicant to complete cultural resources assessment consistent with DAHP requirements to support the EIS.*

  See DEIS Section 3.10 and Appendix E.

- *Aesthetics: The applicant will be required to provide additional details on lighting characteristics and impacts to views and adjacent uses during development and completion of the Draft EIS. This must include proposed treatment of the perimeter of the development and distinct uses within the Mill Site development, including materials and techniques used, such as screens, fences and/or walls.*

  See DEIS Section 3.9. No treatment of the perimeter is proposed unless it is enhancement for wetland mitigation / replacement per response to comment 2(h).

- *Transportation: The applicant will be required to complete a Traffic Impact Analysis (TIA) to support the EIS. As part of the TIA, additional details on impacts to Meadowbrook Bridge and Mill Pond Road will be included. Transportation analysis should also include assessment of proposed land uses and parking requirements consistent with City standards.*

  See DEIS Section 3.11 and Appendix F.

- *Public services (police, fire, schools, parks and recreation/trails): The applicant must complete technical analysis supporting evaluation of utility availability and necessary utility system improvements for all "Build" alternatives within the EIS.*

  See DEIS Sections 3.13, 3.14 and Appendix A, Section 2.E Utilities.

- *Utilities (sewer, water): The applicant must complete technical analysis supporting evaluation of utility availability and necessary utility system improvements for all "Build" alternatives within the EIS. Evaluation must include detailed options for fire suppression sufficiency.*

  See DEIS Sections 3.15 and the City's Draft 2021 Water System Plan (WSP) and 2021 Draft General Sewer Plan (GSP), including analysis of fire flow in the WSP.

We anticipate that the responses to comments provided herein and the submittal of the UPDATED Snoqualmie Mill PCIP application and PCIP Plans together with the proposed master planning and site development elements identified in the published Snoqualmie Mill PCI plan EIS address the project elements.

Please call if you need any additional documentation or have questions to complete your review.

Sincerely,

Trish Clements

Trish Clements | Goldsmith Engineering
Entitlement Manager | 425.462.1080 | tclements@goldsmithengineering.com

PERTEET

MEMORANDUM

38579 SE River Street, Suite 1, Snoqualmie, WA 98065 P 425.888.5825

To: Mark Hofman
Dan Marcinko

From: James Dexter
Rahmi Kutsal

Date: April 4, 2017

Re: Snoqualmie Mill PCI Plan Application Review Comments

Cc: Gwyn Berry, Tom Holmes, Alex Anderson, Nancy Davidson, Dustin Possert, Brian Coleman, Derek Stuart

Dear Mark;

We have finished our review of the Snoqualmie Mill PCI application package. Drainage review is not included and being provided by NHC.

Our review is based on the content requirements for this type of application as stated in NBMC 17.20.050 Planned Commercial/ Industrial Provisions, and 17.50 Planned Unit Development Regulations. As there is limited design detail at this stage, we have focused on general standards and other codes that are applicable to this project. A requirement in the SMC 17.20.050 that was of specific interest in our review was determination of the development standards of general applicability from which a deviation might be proposed later.

Application Note Book

Section II Regulatory Framework

1. E - Development and Permitting: Recommend adding a list of land use and preliminary development permits prior to submittal of build permit applications that are required for Phase 1; for example, a partial list includes:
   a) flood development permit from City of Snoqualmie.
   b) shoreline development permit from City of Snoqualmie.
   c) clearing and grading permit from City of Snoqualmie.
   d) SEPA approval from City of Snoqualmie.
   e) hydraulic project approval (HPA) permit from WA State Fish and Wildlife if work in the or above the OHWM.
   f) Letter of Map Revision (LOMR) from FEMA.
   g) Flood Plain Habitat and Mitigations Assessment (to accompany LOMR).
   h) In addition, SMC 15.12.10 E states no subdivision proposal shall be approved until the application has been submitted to the Department of Ecology and the planning official has either received comments or confirmed in writing Ecology does not intend to submit comments.
2. H - Flood Hazard Regulations: Add to the list of regulations in this section 44 CFR Emergency Management and Assistance, Subpart B Insurance and Hazard Mitigation. While this is referenced in the City's flood hazard ordinance, there are specific sections in 44 CFR that are noteworthy and describe requirements more specifically than in the municipal ordinance. Some of the relevant sections include: section 60.3 flood plain management criteria prohibiting construction in floodways, and restricting flood proofing to non-residential structures in the special flood hazard area (SFHA); and section 65.6 requiring notification to FEMA of changes to base flood elevations. New residential structures must be protected by elevations above the base flood elevation. In SMC 15.12 an additional two feet of freeboard is required.

Section III Existing Conditions

1. B Sensitive Area Environmental Studies: Bullet item "Hazardous or contaminated soils (described further below)". Please provide a specific reference to where this discussion is provided as it is not evident in the rest of the section. It should especially address the PCP dip tank shown on the aerial annexation map in Appendix B. PCP, pentachlorophenol, is a wood treatment chemical which along with creosote was commonly used by the timber industry historically in Washington and is among contaminates identified on the WA state Superfund site list. Soils testing in areas suspected of potentially being contaminated should be included in the EIS study and any remediation requirements identified prior to finalization of the site plan.
2. Provide a discussion of existing ground water elevations, particularly wet season levels between October and April anticipated on the project site. Seasonal ground water level monitoring is required to indicate the minimum elevations for compensatory storage; locations where mitigation measures to reduce inflow and infiltration (I/I) in sewer systems, and other flood proofing per SMC 15.12 flood hazards ordinance may be warranted; and geographic limits for onsite storm water LID (based on infiltration treatment and disposal) design which requires a minimum three foot vertical separation between seasonal high ground water and the bottom of infiltration facilities per 2009 KCSWDM.

Section IV Proposed Plan and Site Design

1. A. Overall PCI Plan Description: This section would benefit by providing a summary table describing the information that is being used to develop the plan listed in SMC 17.20.040 area, height, setback and miscellaneous provisions.
2. C. Floodplain Development and Compensating Storage: first paragraph first bullet "direct discharge of stormwater and flood flow to the Snoqualmie River". If this intended to mean there will be a direct stormwater outfall to the river, which requires new construction (as an existing one isn't shown on the topographic drawing EX-1), then a HPA permit is required prior to construction and should be noted in the application discussion of permits. See previous comment 1 under Section II.
3. This section notes the site is entirely within the 100-year flood plain (SFHA Firm map, revised 2010). Were any site plan alternatives considered that can be described in the EIS alternative site plans that might lessen flood elevation impacts? For example, the north central portion of Planning Area 3 has existing grades theoretically above the BFE. This area could be removed from the SFHA by submitting a Letter for Map Amendment (LOMA) to FEMA, which is relatively simpler than a LOMR.
4. C. Floodplain Development and Compensating Storage: second paragraph beginning "the PCI plan proposes to build within the floodplain displacing flood storage with building footprints as well as fill within the floodplain above the BFE and seek map revisions from FEMA".

   There are two hydrologic and hydraulic engineering considerations in floodplain development applicable to site planning that should be discussed under site design in this application as they affect the site plan:

   a) The loss in hydraulic conveyance capacity as a result of the encroachment of fill placed in the flood plain fringe which has the potential to raise base flood elevations upstream of the project.
   b) The loss of flood storage volume capacity which increases the flood discharge more than expected in the FIS study (and also increases base flood elevations both upstream and downstream because the flood peak is not attenuated as much due to less capacity than provided by the pre-existing storage volume capacity.
5. The explanation in Section C for floodplain development only addresses the second consideration above, and not completely as a subsequent comment discusses. Simply providing new storage somewhere in the floodplain to offset fill elsewhere helps with flood peak attenuation but may not prevent the rise in base flood elevations, particularly if the encroachment is close to the flood way. Provide a discussion how this rise might be mitigated, which only needs to be 0.1 of a foot higher to trigger FEMA notification; and provide a discussion of schedule to indicate when a BFE revision request to FEMA can generally be to be expected. LOMR reviews can take many months or years depending upon the impacts and include public notification periods because BFEs changes are one of the factors considered by the Flood Insurance Administration in setting mandatory flood insurance premiums for residents in the SFHA.
6. A discussion should be added in Section C that pertains to construction of the fill for proposed road way embankment in Phases 2 and 3 that transects the floodway. SMC 14.12.170 Floodways specifically prohibits this fill unless a hydrologic hydraulic analysis demonstrates it would not result in any increase in base flood elevations indicated below. Indicate if a deviation from this ordinance might be expected for approving this roadway.

7. Discuss in Section C the placement of fill and excavation of compensatory storage that must meet SMC 15.12.150 general standards related to site grading shown below:

   "The average finished grade of all lots, tracts or parcels after construction of a building or other development, excluding the area occupied by the above-grade building or other development, shall be no greater than the average grade of the lot prior to construction or development."

   "Subject to the provisions of subsection (F)(2) of this section, no fill shall be permitted except where provision has been made on the subject property to balance the capacity to store floodwaters and accommodate potential surface flow in an amount equal to the amount of floodwater likely to be displaced by the fill." Consider the next comment when addressing this.

8. Two FIRM Sections (W and X) located on this site shown in LOMR dated 2/26/2010 had BFEs of 424.5 feet and 425.3 feet (NAVD88) respectively. However, existing grades are predominately in the range of 422 to 424 feet and 416 to 424 feet along these transects. To achieve an average grade equivalent to the existing, and elevate parts of the site above the effective BFE, there has to be existing land included in the grading plan above the BFEs. SMC 15.12.150 may be another code for which a variance (deviation) may be requested that should be noted in Section C.

9. There is a lower limit to which excavation of storage volume cannot be credited to flood storage because the seasonal high ground water will fill up lower portions of the site rendering the capacity unavailable for peak flood events. Based on FEMAs definition of compensatory storage, it should be provided at hydraulically equivalent elevations to the fill displacing the existing storage. If this cannot be achieved because of site constraints, it should be discussed in Section C.

10. If out of necessity, if the new Mill Pond roadway is required, Section C should discuss what mitigation measures could be considered to lessen the upstream impact on BFE's such as road sag profiles, road way embankments armored for flood overtopping and causeways to pass flood flows in order to relieve flood levels.

11. Section E Utilities 1. Water system: The discussion of the anticipated total water demand states the estimated total demand (next to last paragraph p IV-8 is 702 ERUs and refers to following table; but this table shows a total of 698 ERUs. Please clarify and indicate what the table is showing relative to the narrative.

12. Section E Utilities 2. Sanitary Sewer System: first paragraph under the Summary of System infers the General Sewer / Wastewater Facilities Comprehensive Plan (2012) considered the Snoqualmie Mill in the planning capacity requirements. This is not the case as stated in that sewer comp plan which indicates the proposed project was not included. Recommend adding a table similar to that for water service demand that estimates the capacity requirements for sewer conveyance and treatment that can be compared to the sewer comp plan so concurrency can be clearly established.

13. Section E Utilities 2. Sanitary Sewer System: Snoqualmie Mill System should provide the calculations for the basis for peak flows anticipated for the project that can be compared to the estimated available capacity. The I/I rate for the new system should be based on very conservative flow values, since unlike Snoqualmie Ridge, this project will have significant amounts of the sewer system subject to infiltration in the wet season. Sewer design depth per SMC is a minimum of five feet below grade.

14. The construction of new sewers in new road embankments which are prone to settlement of the underlying soft subgrade (with the result there is sewer pipe joint displacement) should be discussed. Mitigation measures to reduce I/I should be described in the plan.

15. Section F. Roads, Access and Parking: SMC 17.50.070 H Roads and Streets require specific application of City standards. Provide sufficient site plan general road geometric design criteria to show the plan complies with the City's street and site development standards (SRDS II); e.g. proposed right of way width, pavement width, side walk width and landscaping land use. King County Road Standards Chapter 2, referenced in SMC 12.16 Street Standards, can be used for some geometric design information until such time as more specific traffic analysis and anticipated vehicle mix are available.

16. The results of anticipated vehicle mix analysis should be used to establish design vehicles for later detailed road design, but it already seems clear that the existing road widths are unlikely to suffice, particularly using AASHTO vehicle templates for road geometric design in warehousing and industrial areas. The site plan (SP-1) should anticipate and identify road improvements; particularly in light of the difficult soil stability conditions for suitable subgrades.

Appendix B Illustrative Plans

Provide illustrative plans of commercial building flood proofing discussed in the proposed plan and site design (Section IV).

Drawings

Sheet EX-1:

1. Recommend adding a delineation of the ordinary high water mark (OHWM) on the existing conditions topographic map. This will indicate the potential need for a hydraulic project approval (HPA) in the future.
2. Recommend adding the revised FIRM base flood elevations (BFE) shown in the 26 February 2010 letter of map revision (LOMR) approved by FEMA. Show published new effective BFE's for Sections W, X, and Y on the topographic map.

Sheet SP -1:

1. Recommend adding a delineation of the fill areas that are referenced in the application Section IV C. Flood plain Storage and Compensating Storage.
2. Provide quantities of cut and fill for project Phase 1 in a table on the drawing.

Sheet WS-1:

1. Show existing water lines (type and diameter) and SSMH for points of water and sewer connection.
2. Verify that proposed points of connection are feasible and consistent with comprehensive water and sewer plans.
   a) Provide an enlargement of the proposed points of connection within the lower pressure zone serving the area of the treatment plants and Salish Lodge to allow the City to determine of this system is adequate for to serve the PCI site, or whether upgrades are likely in order that these connections can be approved.
   b) Indicate on the plan a location that will be reserved that if a pre-treatment facility is required by the City (See SMC 13.04.460 discharge of specified wastes – approval required and 13.04.470 preliminary treatment facilities) a site is included on the plan for brewery/winery waste water in close proximity to the waste water treatment plant headworks.

Please call me at 425-888-5825 if you have any questions.

Sincerely,

Rahmi Kutsal
James Dexter

GOLDSMITH
LAND DEVELOPMENT SERVICES

January 14, 2022

City of Snoqualmie Planning Department
38624 SE River Street
Snoqualmie, WA 98065

Attention: Jason Rogers, Interim Community Development Director

Re: Snoqualmie Mill PCI Application (PCI 17-0001) - Perteet Responses to Comments

Dear Jason,

As part of the 2022 Snoqualmie Mill, Planned Commercial / Industrial Plan (PCI) Application Update this letter provides our response to comments by Perteet Engineering, dated April 4, 2017, regarding the Snoqualmie Mill PCI Application package. The following identifies (in bold) how the Application Update addresses each comment (in italics) from that review letter.

Application Notebook

Section II Regulatory Framework

1. *E - Development and Permitting: Recommend adding a list of land use and preliminary development permits prior to submittal of build permit applications that are required for Phase 1; for example, a partial list includes:*
   a) *flood development permit from City of Snoqualmie.*
   b) *shoreline development permit from City of Snoqualmie.*
   c) *clearing and grading permit from City of Snoqualmie.*
   d) *SEPA approval from City of Snoqualmie.*
   e) *hydraulic project approval (HPA) permit from WA State Fish and Wildlife if work in the or above the OHWM.*
   f) *Letter of Map Revision (LOMR) from FEMA.*
   g) *Flood Plain Habitat and Mitigations Assessment (to accompany LOMR).*
   h) *In addition, SMC 15.12.10 E states no subdivision proposal shall be approved until the application has been submitted to the Department of Ecology and the planning official has either received comments or confirmed in writing Ecology does not intend to submit comments.*

This type of permits and approvals list is in the project FEIS Fact Sheet. That list is also included in the Regulatory Framework – Appendix C of PCIP Application UPDATE.

2. *H - Flood Hazard Regulations: Add to the list of regulations in this section 44 CFR Emergency Management and Assistance, Subpart B Insurance and Hazard Mitigation. While this is referenced in the City's flood hazard ordinance, there are specific sections in 44 CFR that are noteworthy and*

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describe requirements more specifically than in the municipal ordinance. Some of the relevant sections include: section 60.3 flood plain management criteria prohibiting construction in floodways, and restricting flood proofing to non-residential structures in the special flood hazard area (SFHA); and section 65.6 requiring notification to FEMA of changes to base flood elevations. New residential structures must be protected by elevations above the base flood elevation. In SMC 15.12 an additional two feet of freeboard is required.

44 CFR is discussed in the Regulatory Framework – Appendix C of the PCIP Application UPDATE, but is not included in the list of permits and approvals.

Section III Existing Conditions

1. *B Sensitive Area Environmental Studies: Bullet item "Hazardous or contaminated soils (described further below)."*
   Please provide a specific reference to where this discussion is provided as it is not evident in the rest of the section. It should especially address the PCP dip tank shown on the aerial annexation map in Appendix B. PCP, pentachlorophenol, is a wood treatment chemical which along with creosote was commonly used by the timber industry historically in Washington and is among contaminates identified on the WA state Superfund site list. Soils testing in areas suspected of potentially being contaminated should be included in the EIS study and any remediation requirements identified prior to finalization of the site plan.

   These issues are addressed in the project DEIS, Section 3.5 and Appendix D.

2. *Provide a discussion of existing ground water elevations, particularly wet season levels between October and April anticipated on the project site. Seasonal ground water level monitoring is required to indicate the minimum elevations for compensatory storage; locations where mitigation measures to reduce inflow and infiltration (I/I) in sewer systems, and other flood proofing per SMC 15.12 flood hazards ordinance may be warranted; and geographic limits for onsite storm water LID (based on infiltration treatment and disposal) design which requires a minimum three foot vertical separation between seasonal high ground water and the bottom of infiltration facilities per 2009 KCSWDM.*

These issues have been addressed in the Master Drainage Plan which has been submitted as Appendix A to the DEIS. It specifically uses evaluation of monitoring data to determine limiting elevations for compensating storage. I/I and flood proofing will be addressed through construction design and permitting.

Section IV Proposed Plan and Site Design

1. *A. Overall PCI Plan Description: This section would benefit by providing a summary table describing the information that is being used to develop the plan listed in SMC 17.20.040 area, height, setback and miscellaneous provisions.*

   The UPDATE cites these requirements in the Regulatory Framework – Appendix C of the PCIP Application UPDATE.

2. *C. Floodplain Development and Compensating Storage: first paragraph first bullet "direct discharge of stormwater and flood flow to the Snoqualmie River." If this intended to mean there will be a direct stormwater outfall to the river, which requires new construction (as an existing one isn't shown on the topographic drawing EX-1), then a HPA permit is required prior to construction and should be noted in the application discussion of permits. See previous comment 1 under Section II.*

   This is better described in the UPDATE Regulatory Framework – Appendix C of the PCIP Application UPDATE. It is also addressed in the DEIS Chapter 2 and Appendix A (MDP), that a new stormwater outfall to the Snoqualmie River is proposed for direct discharge conveyance from Snoqualmie Mill.

3. *This section notes the site is entirely within the 100-year flood plain (SFHA Firm map, revised 2010). Were any site plan alternatives considered that can be described in the EIS alternative site plans that might lessen flood elevation impacts? For example, the north central portion of Planning Area 3 has existing grades theoretically above the BFE. This area could be removed from the SFHA by submitting a Letter for Map Amendment (LOMA) to FEMA, which is relatively simpler than a LOMR.*

   Floodplain impacts and compensating storage has been evaluated in the DEIS Section 3.3 and Appendix A (MDP) demonstrating that storage mitigation is feasible with the proposed site design. We understand that the same analysis will be required for the submittal of permits for grading and infrastructure.

4. *C. Floodplain Development and Compensating Storage: second paragraph beginning "the PCI plan proposes to build within the floodplain displacing flood storage with building footprints as well as fill within the floodplain above the BFE and seek map revisions from FEMA."*

   There are two hydrologic and hydraulic engineering considerations in floodplain development applicable to site planning that should be discussed under site design in this application as they affect the site plan:

   a) The loss in hydraulic conveyance capacity as a result of the encroachment of fill placed in the flood plain fringe which has the potential to raise base flood elevations upstream of the project.

The DEIS and Appendix A (MDP) addresses the mitigation of the compensating storage for any fill or displacement of existing flood storage. As discussed above, it is understood that a new analysis will be required for the actual grading design submitted as part of grading and infrastructure permits. Chapter 8 of the DEIS Appendix A (MDP) contains a report and analysis by Watershed Science and Engineering that addressed that the impact on flood conveyance capacity is insignificant.

b) *The loss of flood storage volume capacity which increases the flood discharge more than expected in the FIS study (and also increases base flood elevations both upstream and downstream because the flood peak is not attenuated as much due to less capacity than provided by the pre-existing storage volume capacity.*

The DEIS and Appendix A (MDP) addresses the mitigation of the compensating storage for any fill or displacement of existing flood storage. As discussed above, it is understood that a new analysis will be required for the actual grading design submitted as part of grading and infrastructure permits. Chapter 8 of the DEIS Appendix A (MDP) (Watershed Science and Engineering) report also addressed that potential impact on downstream flooding is insignificant.

5. *The explanation in Section C for floodplain development only addresses the second consideration above, and not completely as a subsequent comment discusses. Simply providing new storage somewhere in the floodplain to offset fill elsewhere helps with flood peak attenuation but may not prevent the rise in base flood elevations, particularly if the encroachment is close to the flood way. Provide a discussion how this rise might be mitigated, which only needs to be 0.1 of a foot higher to trigger FEMA notification; and provide a discussion of schedule to indicate when a BFE revision request to FEMA can generally be to be expected. LOMR reviews can take many months or years depending upon the impacts and include public notification periods because BFEs changes are one of the factors considered by the Flood Insurance Administration in setting mandatory flood insurance premiums for residents in the SFHA.*

   As discussed above, both issues have been analyzed in the EIS and will be additionally addressed on grading and infrastructure permits. Analysis has shown that development of the PCIP anticipates zero rise in the BFE with the compensating storage concept contemplated. Following the completion of infrastructure grading and/or building construction, building owners may file elevation certificates or LOMR's with FEMA as necessary for compliance with NFIP.

6. *A discussion should be added in Section C that pertains to construction of the fill for proposed roadway embankment in Phases 2 and 3 that transects the floodway. SMC 14.12.170 Floodways specifically prohibits this fill unless a hydrologic hydraulic analysis demonstrates it would not result in any increase in base flood elevations indicated below. Indicate if a deviation from this ordinance might be expected for approving this roadway.*

The DEIS Appendix A (MDP) provides the hydrologic and hydraulic analysis demonstrating no increase in base flood elevations of the floodplain. This analysis was of the proposed grading for both Planning Area 1 and proposed mass grading of the entire PCI Plan including a road access from Mill Pond Road to Planning Area 3. The proposal does not anticipate fill within the Floodway and therefore does not expect or propose a deviation from SMC 14.12.170.

7. *Discuss in Section C the placement of fill and excavation of compensatory storage that must meet SMC*
   15.12.150 general standards related to site grading shown below:
   "The average finished grade of all lots, tracts or parcels after construction of a building or other development, excluding the area occupied by the above-grade building or other development, shall be no greater than the average grade of the lot prior to construction or development."

   "Subject to the provisions of subsection (F)(2) of this section, no fill shall be permitted except where provision has been made on the subject property to balance the capacity to store floodwaters and accommodate potential surface flow in an amount equal to the amount of floodwater likely to be displaced by the fill." Consider the next comment when addressing this.

   See response in Comment 8 below.

8. *Two FIRM Sections (W and X) located on this site shown in LOMR dated 2/26/2010 had BFEs of 424.5 feet and 425.3 feet (NAVD88) respectively. However, existing grades are predominately in the range of 422 to 424 feet and 416 to 424 feet along these transects. To achieve an average grade equivalent to the existing, and elevate parts of the site above the effective BFE, there has to be existing land included in the grading plan above the BFEs. SMC 15.12.150 may be another code for which a variance (deviation) may be requested that should be noted in Section C.*

   (Addressing Comments 7 and 8)
   Clarification was provided by the City regarding the interpretation of SMC 15.12.150 and that the intent of this code is met by demonstrating by analysis that the site has provided compensating storage and there would be no increase in the base flood elevations. If the description provided in comment 8 is an interpretation of this code, then this would be considered as a deviation to be included in the PCIP justified by the floodplain analysis provided in the MDP.

9. *There is a lower limit to which excavation of storage volume cannot be credited to flood storage because the seasonal high ground water will fill up lower portions of the site rendering the capacity unavailable for peak flood events. Based on FEMAs definition of compensatory storage, it should be provided at hydraulically equivalent elevations to the fill displacing the existing storage. If this cannot be achieved because of site constraints, it should be discussed in Section C.*

   Monitoring data evaluated in the DEIS Appendix A (MDP) identified the seasonal high groundwater elevation below which cannot be considered as compensatory storage. This lower limit was used in the analysis of floodplain impacts and mitigation.

10. *If out of necessity, if the new Mill Pond roadway is required, Section C should discuss what mitigation measures could be considered to lessen the upstream impact on BFE's such as road sag profiles, roadway embankments armored for flood overtopping and causeways to pass flood flows in order to relieve flood levels.*

    These issues have been considered in the preliminary design grading for the proposed relocation of a portion of Mill Pond Road as well as a future road access extension to Planning Area 3. The Planning Area 3 road would be designed with road sag profiles for flood flow overtopping. Mill Pond Road is planned to include a large culvert underpass to convey flood flow to the new proposed outfall to the river. Reference Updated PCIP Plan Sheet GR-1.

11. *Section E Utilities 1. Water system: The discussion of the anticipated total water demand states the estimated total demand (next to last paragraph p IV-8 is 702 ERUs and refers to following table; but this table shows a total of 698 ERUs. Please clarify and indicate what the table is showing relative to the narrative.*

    This demand analysis has been refined and revised in the DEIS Section 3.14 and Appendix A (MDP) and in the UPDATE Section IV. D. with the inclusion of the proposed winery uses.

12. *Section E Utilities 2. Sanitary Sewer System: first paragraph under the Summary of System infers the General Sewer / Wastewater Facilities Comprehensive Plan (2012) considered the Snoqualmie Mill in the planning capacity requirements. This is not the case as stated in that sewer comp plan which indicates the proposed project was not included. Recommend adding a table similar to that for water service demand that estimates the capacity requirements for sewer conveyance and treatment that can be compared to the sewer comp plan so concurrency can be clearly established.*

    This comment is considered moot. Snoqualmie Mill is included in the City service area and is addressed in the City's 2021 Draft General Sewer Plan (GSP).

13. *Section E Utilities 2. Sanitary Sewer System: Snoqualmie Mill System should provide the calculations for the basis for peak flows anticipated for the project that can be compared to the estimated available capacity. The I/I rate for the new system should be based on very conservative flow values, since unlike Snoqualmie Ridge, this project will have significant amounts of the sewer system subject to infiltration in the wet season. Sewer design depth per SMC is a minimum of five feet below grade.*

    Flow calculations were included in the project EIS for comparison with capacity reported in the 2012 GSP. However, anticipated flow from the site is addressed and included in the City's 2021 Draft GSP.

14. *The construction of new sewers in new road embankments which are prone to settlement of the underlying soft subgrade (with the result there is sewer pipe joint displacement) should be discussed. Mitigation measures to reduce I/I should be described in the plan.*

The project DEIS, Section 3.1, and geotechnical reports appended to the EIS (Appendix B) address these issues. The reports provide evaluation of soils and recommendations for subgrade preparation and recommendations for factors of safety added to minimum slopes of gravity utilities.

15. *Section F. Roads, Access and Parking: SMC 17.50.070 H Roads and Streets require specific application of City standards. Provide sufficient site plan general road geometric design criteria to show the plan complies with the City's street and site development standards (SRDS II); e.g., proposed right of way width, pavement width, sidewalk width and landscaping land use. King County Road Standards Chapter 2, referenced in SMC 12.16 Street Standards, can be used for some geometric design information until such time as more specific traffic analysis and anticipated vehicle mix are available.*

    A deviation from City Road Standards will be used for the design of Mill Street. All other circulation within the site will be private drive aisles within parking lots or warehouse loading areas. The relocated portion of Mill Pond Road will be public and will require adherence to city road standards. The PCI Update shows a general alignment which will be fully designed with infrastructure permit applications, however additional detail has been added to PCI Plan Sheet SP-2 and the road sections on Sheet SP-3.

16. *The results of anticipated vehicle mix analysis should be used to establish design vehicles for later detailed road design, but it already seems clear that the existing road widths are unlikely to suffice, particularly using AASHTO vehicle templates for road geometric design in warehousing and industrial areas. The site plan (SP-1) should anticipate and identify road improvements; particularly in light of the difficult soil stability conditions for suitable subgrades.*

    Acknowledged.

Appendix B Illustrative Plans

Provide illustrative plans of commercial building flood proofing discussed in the proposed plan and site design (Section IV).

The PCI plan now anticipates that proposed buildings will be constructed on compacted fill above the base flood elevations and will not require flood proofing.

Drawings

Sheet EX-1:

1. *Recommend adding a delineation of the ordinary high water mark (OHWM) on the existing conditions topographic map. This will indicate the potential need for a hydraulic project approval (HPA) in the future.*

   The UPDATED PCI Plan Sheets EX-1 and EX-2 depict an OHWM in the area to be a newly constructed outfall to the river. It is anticipated that no work will occur below the OHWM however it is anticipated that an HPA will be required.

2. *Recommend adding the revised FIRM base flood elevations (BFE) shown in the 26 February 2010 letter of map revision (LOMR) approved by FEMA. Show published new effective BFE's for Sections W, X, and Y on the topographic map.*

   These are the BFE elevations shown on the Updated PCI Plan Sheet EX-2. These sections, however, have been revised subsequently by FEMA in August 2020 and renamed. These revised sections have been evaluated with those shown in the MDP and found to be consistent.

Sheet SP-1:

1. *Recommend adding a delineation of the fill areas that are referenced in the application Section IV C. Flood plain Storage and Compensating Storage.*

   UPDATED PCIP Plans now contain Sheets GR-1 and GR-2 reflecting proposed grades and depict areas proposed to be filled above the BFE.

2. *Provide quantities of cut and fill for project Phase 1 in a table on the drawing.*

   The grading and floodplain compensating storage shown on UPDATED PCIP Plan Sheets GR-1 and GR-2 do not specifically show quantities of cut and fill, however, does provide a table that compares pre- and post-development floodplain storage. Quantities of cut and fill will be evaluated during design and provided with infrastructure permit applications.

Sheet WS-1:

1. *Show existing water lines (type and diameter) and SSMH for points of water and sewer connection.*

   Existing off-site water mains added to UPDATED PCIP Plan Sheets WS-1 and WS-2. The refined and revised water and sewer plans and descriptions in the Update better depict the proposed points of connection that are consistent with the City's new 2021 WSP and General Sewer Plan.

2. *Verify that proposed points of connection are feasible and consistent with comprehensive water and sewer plans.*
   a) *Provide an enlargement of the proposed points of connection within the lower pressure zone serving the area of the treatment plants and Salish Lodge to allow the City to determine of this system is adequate for to serve the PCI site, or whether upgrades are likely in order that these connections can be approved.*

These have been verified and are addressed in the City's 2021 Draft WSP and 2021 Draft GSP. The 2021 Draft WSP shows Snoqualmie Mill will be served with a water main extension capital facility WM-12 Mill Site Loop. However, it has been determined through the project EIS that Planning Area 1 does not require the full loop connection to SR-202. Connection points are shown on Sheets WS-1 and WS-2.

b) *Indicate on the plan a location that will be reserved that if a pre-treatment facility is required by the City (See SMC 13.04.460 discharge of specified wastes - approval required and 13.04.470 preliminary treatment facilities) a site is included on the plan for brewery/winery waste water in close proximity to the waste water treatment plant headworks.*

This is shown on the refined and revised Planning Area 1 Conceptual Sewer Plan (PCI Plan Sheet WS-2) for sewer in the UPDATE. However, the City has indicated that the determination of whether pretreatment facilities will or will not be required will be made during review of specific plans in the future for project uses.

We anticipate that the responses to comments provided herein and the submittal of the UPDATED Snoqualmie Mill PCIP application and PCIP Plans together with the proposed master planning and site development elements identified in the published Snoqualmie Mill PCI plan EIS address the project elements.

Please call if you need any additional documentation or have questions to complete your review.

Sincerely,

Keith Goldsmith, P.E. | Goldsmith Engineering
President & CEO | 425.462.1080 | kgoldsmith@goldsmithengineering.com

Appendix B

City Reference Documents / Maps

- Annexation Map
- Zoning Map
- **Comprehensive Plan Map**

Appendix C

Regulatory Framework

Appendix C

REGULATORY FRAMEWORK

Redevelopment of the Snoqualmie Mill site will be consistent with the provisions of the *Planned Commercial/Industrial Districts and Zone (PCI) per Snoqualmie Municipal Code (SMC) 17.20*. Any development or land disturbing activities proposed in the future will be required to adhere to the Approved PCI Plan as well as applicable local, state and federal regulations. , including but not limited to those cited below.

Planned/Commercial Industrial Application and State Environmental Policy Act (SEPA) Review

Planned Commercial/Industrial District Regulations - SMC 17.20.050.

PCI Provisions (SMC 17.20.050.J) and Process (SMC 17.05.090 (B)

Post PCI Regulations – Development and Permitting (SMC 19.08)

Surface Water and Stormwater Management Regulations - SMC 15.18

Critical Areas - SMC 19.12

Shoreline Management Regulations - SMC 19.08

Flood Hazard Regulations - SMC 15.12 and SMC 19.12.150

FEMA Flood Regulations (44 CFR)

Washington Department of Fish and Wildlife (WDFW) Hydraulics Project Approval (HPA)

U.S. Army Corps of Engineers Clean Water Act Sec. 404

Washington State Section 401 Water Quality Certification

Department of Ecology Construction National Pollutant Discharge Elimination System (NPDES)

Permit and Possible Winery General Permit

Model Toxics Control Act (MTCA) (RCW Ch. 70A.305) and implementing regulations

As agreed with the City of Snoqualmie, an Environmental Impact Statement (EIS) has been prepared in connection with the PCI Plan Application. The EIS evaluates the consistency of the proposed PCI Plan with selected regional and local policies and development regulations consistent with SEPA Rules at WAC 197-11-440 (6). EIS Section 3.7. Plans and Policies focuses on consistency with the City's Comprehensive Plan, including annexation implementation plan requirements, zoning regulations, shoreline requirements and flood hazard regulations. Therefore, the EIS analysis supplements the regulatory regulations and requirements described below. The Snoqualmie Mill PCIP EIS is incorporated by reference as support documentation.

A. Planned/Commercial Industrial Application and State Environmental Policy Act (SEPA) Review

The PCI application was submitted to the City on March 22, 2017 and received a Determination of Completeness Application on April 19, 2017. This is the UPDATED PCI Plan Application submitted for final approval and implementation of development standards on the Snoqualmie Mill site.

The applicant voluntarily committed to prepare an environmental impact statement for the Snoqualmie Mill project concurrently with the PCI Plan application. The City is the lead agency for SEPA compliance and issued a combined Notice of Application and Determination of Significance/Scoping Notice on May 3, 2017. An open house and scoping meeting occurred on May 23, 2017, resulting in scoping comments from agencies and the public which the City considered in establishing the scope of analysis and alternatives to be addressed in the Draft EIS.

The City is following the procedures for phased environmental review, as authorized by the SEPA Rules (WAC 197-11-060(5), SMC 19.04.020), for the Snoqualmie Mill PCI plan which allows environmental review to occur in stages, and to be coordinated with the phases of master planning for the proposal. The EIS environmental analysis provides evaluation, technical support and detailed information regarding the phased approach for development of the Snoqualmie Mill PCI Plan and likewise the phased SEPA approach.

Varying levels of detail are identified for the site's three planning areas within the PCI Plan. Planning Area 1 has greater detail, with lesser, more conceptual detail for Planning Areas 2 and 3. The varying details describe the long-term time horizon for site development, the level and detail of master planning conducted to date, the anticipated timing of development of different types of uses and buildings, and the substantial infrastructure needs that will be generated by later development stages. Site design and master planning for Planning Areas 2 and 3 will continue to be developed in greater detail over time, together with supplemental environmental analysis in the phased review process.

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The Snoqualmie Mill PCIP EIS is incorporated by reference as support documentation.

B. Planned Commercial/Industrial District Zone Regulations– SMC 17.20.020 and .050

In accordance with the approved Annexation Implementation Plan (AIP), any future proposed development of the Mill Planning Area property is required to comply with the *Planned Commercial/Industrial District Regulations of the Snoqualmie Municipal Code (SMC) – SMC 17.20; and specifically, with the PCI District Zoning (SMC 17.20.020(E).*

See PCI Intent in Section II which identifies each of the regulatory provisions of SMC17.50.090(B) and responds to how these regulatory provisions are addressed in detail.

C. PCI Provisions (SMC 17.20.050.J) and Process (SMC 17.05.090 (B)

"*The application shall include all of the materials required for a planned unit development pursuant to SMC 17.50.090(B), …, 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*". See Section VI of SMC 17.20.050.

See the PCI Provisions in Section II of the PCIP Application which identifies each of the regulatory provisions of SMC17.50.090(B) and responds to how these regulatory provisions are addressed in detail.

D. Post PCI Regulations – Development Review and Permitting (SMC 14.10 - .40, and SMC 13, 15, SMC 16, and SMC 19,)

Upon approval of the Snoqualmie Mill Planned Commercial / Industrial Plan (PCIP) permit, site development permitting for development will occur in accordance with the City of Snoqualmie Municipal Codes (SMC); and the Snoqualmie Mill Development Agreement anticipated to be prepared and entered into between the Applicant and the City in conjunction with the UPDATED Snoqualmie Mill PCIP Application.

Below is a list of possible City of Snoqualmie permit approvals that may be required in the future to approve and construct the proposed Snoqualmie Mill PCI Plan project. The list may include, but are not limited to:

- Boundary line adjustments or Subdivision
- Conditional use permits,
- Shoreline Substantial Development (SSD) permits,
- Site Development Permit (road and storm, water, sewer, Wetland buffer restoration and enhancement, landscape, etc.),
- Flood hazard permit,
- Building permits,
- Clearing and grading permits preceding SDP,
- Right-of-way use permits,

Permits from state and federal agencies will also be required for the project and are further identified in the following applicable regulations below.

E. SMC 15.18 – Surface Water and Stormwater Management Regulations in hierarchal order:

Stormwater Management developed for the Snoqualmie Mill Planned Commercial-Industrial Plan (PCIP) was prepared as a Master Drainage Plan for *Large Project Drainage Review* in accordance with the *2016 King County Surface Water Design Manual* (KCSWDM) by Goldsmith Engineering (Updated April 2020). The MDP is included as Appendix A of the Snoqualmie Mill PCI Plan Draft Environmental Impact Statement (DEIS April 2020). The MDP analysis provides for programmatic level planning and engineering for the overall project and project level planning and engineering for Planning Area 1 (Phase
I).

The MDP for Snoqualmie Mill is subject to the City of Snoqualmie *Stormwater Regulations SMC 15.18.* The City has adopted the *2016 King County Surface Water Design Manual (KCSWDM)* which is deemed equivalent to the *2012/2014 Stormwater Manual for Western Washington (Department of Ecology).* Regulations for stormwater management that are applicable to the project include (but are not limited to):

1. Appendix I of the Western Washington Phase II Municipal Stormwater Permit,
2. Appendix I-E, Flow Control Exempt Surface Waters, of the Washington State Department of Ecology Stormwater Management Manual for Western Washington, 2012, amended in 2014,
3. The City of Snoqualmie Addendum to the 2016 King County Surface Water Design Manual, and
4. The 2016 King County Surface Water Design Manual.

The Snoqualmie Mill MDP stormwater management strategy for development is primarily flood control and compliance with the City's Flood Hazard Regulations (SMC 15.12). The site lies within the Snoqualmie River floodplain and is designated as a Direct Discharge site. The MDP includes hydrologic and hydraulic modeling of the Snoqualmie River base flood, for both pre-development and post-development project conditions. The MDP has been prepared for Snoqualmie Mill to provide the approach to and analysis of stormwater management and control of impacts to site specific water resources. There will be more emphasis on floodplain management and on-site wetland hydrology. During normal rainfall, the stormwater management system performs as a combination of collection, treatment and direct discharge to the Snoqualmie River, and collection, treatment and discharge to on-site and off-site wetlands to maintain wetland hydrology. The Snoqualmie River is designated as a direct discharge receiving water body by the KCSWDM and the Ecology Manual, thus the site is exempt from flow control requirements.

See the MDP included as Appendix A of the Snoqualmie Mill PCI Plan Draft Environmental Impact Statement (DEIS April 2020).

F. Critical Areas (SMC 19.12)

Development of the site is subject to the provisions of SMC 19.12.

Critical area wetlands and streams and associated buffers have been evaluated by the project biologist, Raedeke Associates, Inc. in Appendix C to the project EIS SEPA document recently completed for the PCIP Application. The DEIS and Appendix C are hereby incorporated by reference for review with this UPDATED PCI Plan application. The referenced studies discuss the history and current conditions of poor-quality buffers around critical areas and the PCIP proposal to improve the overall function of on-stie buffers through enhancement and deviations proposed under SMC 17.20.

G. Shoreline Management Regulations (SMC 19.08)

Development within shoreline environs will require compliance with City Shoreline Management Regulations and approval of a Shoreline Substantial Development Permit (SSD) from the City. The Master Drainage Plan (MDP) and EIS shoreline environs analysis are based on the City of Snoqualmie's
UPDATED Shoreline Management Plan (SMP) officially adopted on August 26, 2019 by the City. The Washington State Department of Ecology (DOE) granted conditional approval of the SMP update on June 21, 2021. The City of Snoqualmie Council adopted the conditions via Ordinance No. 1252. DOE conveyed final acceptance on August 17, 2021. No appeal was made and therefore the SMP was approved by Ecology effective August 17, 2021. Exhibit 3.7-7 – Snoqualmie Shoreline Jurisdiction was depicted in the project DEIS Chapter 3.7.

The shoreline environments applicable to Snoqualmie Mill are the **Urban Riverfront Environment** and the **Urban Floodplain Environment**. Exhibit 3.7.-8 – City of Snoqualmie Shoreline Environment Designations are reflected in the project DEIS (April 2020) and the MDP Appendix A to the project EIS SEPA document under concurrent review with the PCIP Application.

The DEIS and Appendix A (MDP) are hereby incorporated by reference for review with this UPDATED PCI Plan application.

H. Flood Hazard Regulations (SMC 15.12 and SMC 19.12.030)

Most of the Snoqualmie Mill Site is mapped by FEMA as lying within the 100 year floodplain Zone AE of the Snoqualmie River, below the base flood elevation. (Ref. February 2010 Letter of Map Revision **(LOMR)**, FIRM Panel 0737F.)

In August 2020, the FEMA FIRM Panel Map 0737F was UPDATED. Flood Insurance Study Vol 2 Table 6 (also published Aug 2020).The FEMA update is discussed in Section VI of this Update and shown on Sheets EX-2 of the PCI Plans.

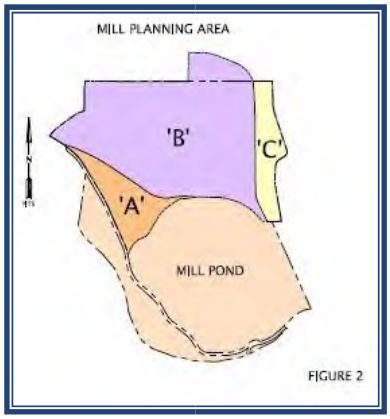
Proposed development within the Floodplain or Floodway within the City of Snoqualmie will be governed by the City's Flood Hazard Regulations found at SMC 15.12 as well as FEMA regulations found in the Code of Federal Regulations **(CFR)** 44. As such, any site disturbing activities within a Floodplain or Floodway will require an approved Flood Improvement Permit.

Following annexation of the Mill Planning Area, the City designated the Site as follows, and as generally depicted in Figure 2 below:

Flood Hazard Designations

Area	Approximate Area	FEMA Designation	Land Use Designation
A	38.70 Acres	Zone AE - Floodway	Parks and Open Space (OS-2)
B	206.66 Acres	Zone AE - Floodplain	Planned Commercial Industrial (PCI)

Mill Pond/Borst Lake is not included in the Snoqualmie Mill Ventures, LLC ownership and it lies outside the Snoqualmie Mill PCIP boundary. The majority of the Mill Pond/Borst Lake area appears to lie within the Floodway, although no elevation / topographic surveys have been conducted on this portion of the Mill Planning Area.



Compliance with Flood Hazard Regulations includes those provisions related to construction of buildings and future submission for appropriate Letters of Map Amendments or Revisions **(LOMA or LOMR)**. The Snoqualmie Mill Master Drainage Plan, Appendix A to the project DEIS is intended to demonstrate the feasibility of future compliance and proposed compliance for development of Planning Area 1 for:

- 15.12.130 and 15.12.150 – Variances from requirements of Chapter 15
- 15.12.150(A) Finished Grade After Construction and Floodplain Compensating Storage,
- 15.12.150(D) Utilities – new and replacement water and sanitary sewer systems
- 15-12.160(E) Critical Facilities – feasibility of critical utilities (specifically sanitary sewer) for future development,
- 15.12.160(F) Fill – Demonstration of no increase in the base flood discharge,
- 15.12.160(G) Clearing and Grading – Feasibility grading and proposed Planning Area 1 grading for the analysis of compliance with 15.12.150(A) and 15.12.170.
- 15.12.170 Floodways – Hydrologic and hydraulic analyses demonstrating no increase in flood levels during the occurrence of the base flood discharge.

I. FEMA Flood Regulations – Title 44CFR

Any future proposed development of the Snoqualmie Mill site will be required to comply with and be consistent with the Floodplain Management Regulations of the National Flood Insurance Program (NFIP) found in Chapter 44 of the Code of Federal Regulations (44 CFR) – Emergency Management Assistance. More specifically, Subchapter B. Insurance and Hazard Mitigation, and relevant sections listed below, including but not limited to:

- Section 60.3 - Flood plain management criteria for flood-prone areas
- Section 65.6 – Revision of base flood elevation determinations

A primary element of such compliance is a "zero-rise" floodway analysis. Snoqualmie Mill intends to exceed this provision by providing demonstration that there will be no increase in flood levels during the occurrence of the base flood discharge (i.e., the **floodplain**) consistent with SMC 15.12 and SMC 19.12. This analysis will ensure that there is no impact to the City of Snoqualmie, or other surrounding properties, by any rise in the 100 year flood elevation of the Snoqualmie River.

The DEIS Appendix A (MDP) contains the floodway analysis evaluation per the flood plain management regulations. These documents are hereby incorporated by reference for review with this UPDATED PCI Plan application.

J. Washington Department of Fish and Wildlife (WDFW) – Hydraulics Project Approval (HPA)

The proposal for a constructed outfall to the OHWM of the Snoqualmie River for direct stormwater discharge will require a Hydraulics Project Approval (HPA) from the Washington State Department of Fish and Wildlife (WDFW). The conceptual design of the direct discharge outfall is provided in the UPDATED PCIA Application plans and as part of the MDP, Appendix A to the project DEIS SEPA document Final design and construction permitting will require obtaining an HPA through the Department of Fish and Wildlife prior to construction.

K. U.S. Army Corps of Engineers Clean Water Act Sec. 404

The Federal Clean Water Act (Section 404) discourages the discharge of dredged or fill material into the nation's waters including most wetlands and streams, and certain ditches without a permit from the U.S. Army Corps of Engineers (COE). The COE is the federal entity to make the final determination regarding the permitting noted above.

The U.S. Army Corps of Engineers (COE) issued a Jurisdictional Determination (JD) for Snoqualmie Mill on May 3, 2017. The jurisdictional determination was issued as a result of review and site inspection(s) based on thorough site analysis prepared and submitted by the Applicant's Wetland Biologist Raedeke Associates, Inc. The Corps review included wetlands, ditches and streams located on the Snoqualmie
Mill site.

The Approved Jurisdictional Determination is valid for a period of five (5) years from the date of the letter(s) noted above. The currently approved Jurisdictional Determination for the site is valid through 2022. The Snoqualmie Mill PCIP application site plan has been planned in accordance with the boundaries of the jurisdictional wetlands, ditches, and streams.

There is no proposed fill or alteration of a water of the U.S. that would require a permit under Section 404. If such a permit is sought for future ultimate build-out and mass grading, appropriate applications and consultation would be required. Snoqualmie Mill is, however, preparing a Biological Evaluation (BE) as part of the Flood Hazard Development Permit.

The project biologist, Raedeke Associates, Inc. prepared the Wetlands, Wildlife and Fisheries Assessment, Appendix C to the DEIS. This assessment provides project specific and programmatic level evaluation of wetlands and streams, wetland determination guidance per U.S. Army Corp of Engineers wetland determination, and proposed buffer restoration and enhancement plan and mitigation, and site investigation for construction of the stormwater outfall and roadway roundabout adjacent to the right bank of the Snoqualmie River. The DEIS and Appendix C are hereby incorporated by reference for review with this UPDATED PCI Plan application.

L. Department of Ecology Construction National Pollutant Discharge Elimination System (NPDES) Permit and Winery General Permit

For all new construction activity exceeding 1 acre in size, a Notice of Intent (NOI) must be filed for a National Pollutant Discharge Elimination System (NPDES) Permit (General or Individual) with Ecology for discharge of stormwater. The NPDES permit requires preparation of a Construction Stormwater Pollution Prevention Plan (CSWPPP). A CSWPPP will be prepared with future design plans for the project.

The Department of Ecology as part of their *draft* **Winery General Permit** has performed a great deal of research in recent years regarding water demand and the volumes and concentrations of wastewater from the production of wine in the State of Washington and following implementation by Ecology, individual wineries within Snoqualmie Mill which plan to produce 7,500 cases or more of wine per year will be required to apply and obtain a Winery General Permit.

One of the conditions of the Winery General Permit is for winery producing activity draining to a public wastewater treatment plant (WWTP). In such cases where the WWTP is a "Listed Facility" by Ecology for receiving winery wastewater, no other measures are necessary by the winery. However, if the WWTP is not a Listed Facility, such as the City of Snoqualmie WWTP, the requirement under the permit is to follow restrictions or pretreatment measures required by the WWTP.

Appendix D

DEIS Appendix A - Master Drainage Plan (April 2020) – Chapter 6

6. Drainage Control Plan

A. Stormwater Management Description

As discussed in **Chapter 3**, the primary regulatory framework for stormwater management for Snoqualmie Mill (notwithstanding flood regulations) is the 2016 King County Stormwater Management Manual, City of Snoqualmie Addendum to the 2016 King County Surface Water Design Manual; and the 2012/2014 Stormwater Manual for Western Washington (Dept. of Ecology) specifically, Appendix I-E criteria for direct discharge exemption from flow control. These are referred to herein as *KCSWDM* and the *Ecology Manual*, respectively.

As determined in **Chapter 5 Existing Conditions**, the site lies entirely within the Snoqualmie River Basin and currently drains to the Snoqualmie River from two (2) Threshold Discharge Areas. Drainage leaves the site at three (3) locations: directly to the river via overland flow, through Borst Lake (or the old Snoqualmie Mill Pond) via on-site ditches (Borst Lake drains over a manmade outlet weir and culvert under Mill Pond Road to the Snoqualmie River), and through the Northeast portion of the site that drains to the river via a large off-site wetland complex lying north of the property. The entire site (with the exception of some areas of the site above the Base Flood Elevation) as well as immediate downstream areas lie within the 100 year floodplain of the river.

The stormwater management strategy for development of Snoqualmie Mill is primarily flood control and compliance with Flood Hazard Regulations. But during normal rainfall, it is a combination of collection, treatment and direct discharge to the Snoqualmie River, and collection, treatment and discharge to onsite and off-site wetlands to maintain wetland hydrology. As discussed in the Regulatory Framework, the Snoqualmie River is designated as a *Direct Discharge Receiving Water Body* by the KCSWDM and the Ecology Manual, thus the site is exempt from flow control Core Requirement #3. Post developed drainage to on-site and off-site wetlands will be evaluated by the wetland biologist for consistency with current conditions. This applies to all wetlands and drainages between the site and the Snoqualmie River.

Therefore, the Stormwater Management Plan for Snoqualmie Mill can be described in four (4) primary components:

1) Direct Discharge to the Snoqualmie River,
2) Maintenance of Wetland Hydrology,
3) Runoff Treatment of Pollutant Generating Impervious and Pervious Surfaces (**PGIS and PGPS**),
4) Flood Control and Compliance with Flood Hazard Regulations.

B. Stormwater Management Plan

1) Direct Discharge to the Snoqualmie River

The qualification as a Direct Discharge site has been demonstrated in **Chapter 3** – Regulatory Framework. This allows that any runoff from the site directly discharging to the Snoqualmie River is exempt from flow control (per KCSWDM Core Requirement #3), provided that hydrology to wetlands is maintained approximating "*existing conditions*". Uniquely, Snoqualmie Mill currently

contains a vast amount of existing impervious surface (see discussion in Chapter 1). Therefore, in those areas heavily covered by effective impervious surface, the stormwater plan must direct most or all the future runoff to the on-site wetlands even though direct discharge is allowed, and flow control requirements are exempt (See **Maintenance of Existing Flows for Wetland Hydrology Mitigation**, below).

Planning Area 1 Detail

Planning Area 1 will establish the initial grading of the site and is discussed in detail below under Flood Control and Compliance with Flood Hazard Regulations. Planning Area 1 grading and infrastructure development will include the initial relocation of Mill Pond Road for site entry, and the construction of a direct discharge outfall to the Snoqualmie River.

The outfall is proposed as a broad surface swale along portions of the realigned Mill Pond Road to provide surface flow to the OHWM of the river. Clean and/or treated runoff from the western portion of the site would be conveyed (through storm pipes) to the broad swale. The swale will be constructed to provide positive drainage to the river by excavating a portion of the existing (to be abandoned) Mill Pond Road a portion of which may be part of a King County maintained Revetment. Design of the channel and the banks of the swale will include necessary stabilizing rock, Rip-Rap and vegetation to prevent destabilization of the existing Mill Pond Road embankment over time and may require stabilization review by King County.

Runoff from the eastern portion of the site would be conveyed to the river through on-site and offsite wetlands to maintain wetland hydrology as required by the Direct Discharge criteria. This is described in detail under **Maintenance of Existing Flows for Wetland Hydrology Mitigation**, in subsection 2) on the following pages. These wetlands are the existing conveyance paths for runoff from these site areas.

A preliminary engineering plan for grading and stormwater control for Planning Area 1 is depicted on **Figure 6-1.** Other depictions of the concept of fill for Planning Area 1 and compensating storage are shown in Chapter 2 (**Figures 2-6 through 2-9**). Figure 6-1 shows the concept for collection and conveyance of runoff, treatment areas and treatment types and discharge locations. It includes the location, based on preliminary design, of an outfall to the Snoqualmie River for direct discharge stormwater and for improved control of receding floodwater. A detailed Snoqualmie River Outfall Concept is shown on **Figure 6-2.**

Future design and permitting will provide actual analysis and appropriate sizing of storm conveyance facilities. However, preliminary estimates of the direct discharge flows are contained in the analysis Appendix B-5 to Chapter 8 for future assistance in sizing of basic treatment facilities for Planning Area 1 shown on **Figure 6-1**.

Memorandum to City Councilmembers and the Hearing Examiner:

Presented to you by Snoqualmie Community Action Network (SCAN)

At the Public Hearing for the
Snoqualmie Mill Planned Commercial/Industrial Plan

March 30, 2022

This memorandum is part of the record. We are submitting it in this way because as Councilmembers you will be making your decision on a closed record and we will have no opportunity to talk directly to you any other way.

We are residents of the city and we really care about our future. We spent hundreds of hours researching this project. We submitted a detailed issue by issue analysis of the staff report. We hope that you will read it as carefully as we prepared it for you.

We had less than a week to write it because the Applicant submitted a new updated application and the staff reviewed it, but both were not released to the public until March 22 and 23. So forgive our typos!

We also appealed the Final Environmental Impact Statement, but that hearing is next week. For this Plan Hearing we prepared and submitted four documents:

1. A marked up Staff Report with our critique of the staff's recommended conditions of approval.

2. A marked up Staff Report with our technical, legal, and policy comments. Many of our comments came from experts in various fields.

3. A marked up Updated PCI Application Submittal with our comments. Some of these comments also came from experts.

4. This document, a Memorandum to the Council.

We hope that all of these documents will help you make a good decision. They are all in the record, but the staff may not give them to you because it may be

their job to edit what you receive. We have requested that you get copies, but you may have to ask for them. These documents are also going to the Hearing Examiner, of course, and we hope that she will make good use of them too.

Here are some of our major suggestions:

The Council should make sure that the proposed Phase 1 wine and restaurant district actually gets built. As it stands, there are no guarantees that that is what will actually get built.

The Council should make sure that the Development Agreement goes through a thorough public process with a public hearing, otherwise it will look like the developers and the staff are meeting secretly to negotiate a contract that will last 15 years. The Council should be part of those negotiations too.

The Council should make sure that all of the promises and findings of fact in the staff report and the Applicant's application become conditions of approval and performance standards. If a major fact turns out to be different, the project approval should change too. History is full of examples of developers changing their plans or selling to others who don't share the same vision. If it isn't an actual condition of approval, it can't be relied upon.

The Council should hire consultants at the Applicant's expense to "Peer Review" all of the technical documents that will be submitted with permit applications. This is a tried and true way to get unbiased, thorough reviews to protect the public.

The Council has to be extraordinarily careful about toxic pollution being released into the air and the water. This is important. The Department of Ecology calls this site the second most polluted site in the State, second only to Hanford. Every independent expert we spoke to believes that the survey work that has been done so far isn't nearly enough. You don't want to be responsible for a disastrous pollution plume floating down the river.

The Council also has to be careful about flooding and wetlands. The experts with whom we spoke all say that the plans to use wetlands to control flooding and clean up stormwater on a site like this are very risky and not well thought through. We all know the power of the river, and floods are likely to get worse in

the future. We only have one chance to get this right. That's where "Peer Review" comes in.

The Council should not accept completed applications for implementing permits like clearing and grading permits until all of the important studies and reports are complete. This is especially important for the issues of toxic pollution remediation, wetlands, flooding and traffic. If you allow permit to applications to "vest" before the studies are done you may find that you froze regulations and standards that weren't effective.

The Council should not remove the requirements for Conditional Use Permits and reviews by the Design Review Board. The history of projects like this strongly suggests that we all need the most careful review that we can get. The best outcomes occur when the public has a chance to participate in meaningful ways.

The Conditions Aren't Strong Enough So We Need You to Pass Some Amendments

The Council has the power to adopt amendments, but this can be tricky because any amendment you adopt has to be legally defensible. It's hard to do that when you don't have personal staff and you don't know all the legal details.

The best way to adopt an amendment that you want is to keep it simple, and say that you want to "Remand to the Hearing Examiner to develop findings of fact from the record that support this amendment."

This is the way to ensure that the amendment will be legally defensible and enforceable, and will reflect the Council's intent. Be clear about your intent, but let the Hearing Examiner work out the details for you.

The document that we submitted where we took the staff report and marked it up in red contains many detailed amendments to the staff's recommended conditions. We sincerely hope that you will carefully consider them. That's all anyone can ask of an elected official.

Up until now, the only people who have been involved in this project have been the Executive Branch (the Mayor and his staff) and the Applicant. But the final decision rests with the Legislative Branch; that's you. There is a reason why State law gives that power to the Council. You are the branch of government that is closest to the people.

Even though this project has been worked on for several years, the Council is just now coming to bat. Please don't let yourself get rushed. This is a massively important project.

Maybe we only get a week to look at the staff report, but you can take all the time you need to get this right.

Now we are proud to present to you eight amendments that may ensure that this project turns out the best that it can be:

Attachment, Eight Proposed Amendments from SCAN and other residents of Snoqualmie and surrounding areas.

Scroll Down to Amendments

Amendment Number One

The following description of Phase One shall be considered a condition of approval and any material change will require a change to the Planned Industrial Commercial permit approved by the City Council. This provision shall be included in the Development Agreement.

"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."

Rationale:

This amendment would guarantee to the public that the vision of a pedestrian oriented wine district will actually turn out to be what they get.

As currently proposed, the developer can change his mind and decide to do something else. Without this amendment all the Council is actually approving is Table 1 on Page 2 of the Staff Report. Nothing on Page 2 says anything about a pedestrian oriented wine and restaurant district.

We strongly encourage you to establish rock solid guarantees for the promises that are being made by the Applicant. History is replete with examples of communities "Buying a Pig in a Poke" and getting a totally different project than they thought they were getting.

These are economically worrisome times. There is a lot of uncertainty in the business community. Can the region support another Woodinville type tourist district? Mixed Use developments all around the country are having a hard time leasing out those quaint little retail spaces. Will this development pencil out? Faced with financial setbacks will the developer decide to build an Amazon distribution center or something like that?

The Council can protect our community from unexpected consequences like this by adopting this amendment.

Amendment Number 2

The Development Agreement shall be subject to a Public Hearing before the City Council for the purpose of scoping the negotiations and again before consideration and adoption by the City Council. Additionally, city staff shall regularly brief the Council about issues under consideration in the Development Agreement negotiations.

Rationale:

Development Agreements are a relatively new device that cities and developers use to condition long term projects. They were authorized by State law in 1995. You can read about them here on the Municipal Research Services Center's website here: https://mrsc.org/Home/Explore-Topics/Planning/Land-Use-Administration/Development-Agreements.aspx#statutes

Critics of Development Agreements call them "Inoculations against Democracy" because they are long term contracts that one City Council approves that are binding on all future City Councils.

Another concern about Development Agreements is that they involve negotiations that are not open to the public between the developer and city staff. Since these negotiations cover a wide range of important subjects the public may view them as "back room deals"

Development Agreements can't change city law or code and they must be consistent with them, but experience shows that all too often Development Agreements are used to modify the code through interpretations and exceptions.

The conditions that are included in Development Agreements usually can't be changed unless the City and the developer both agree. This poses special problems because if the City later determines that a condition wasn't strong enough to protect the public interest it can't change it.

This creates exceptional problems when science discovers new information such as when it was discovered that very minute amounts of copper could lead to declines in salmon populations. If a City had approved a Development Agreement with just basic

water quality regulations instead of enhanced water quality standards, they had no practical way to address this problem.

One way to reduce the problems associated with Development Agreements is to fully vet them in a public way before the process begins such as with a Public Hearing. Another way is to require regular reports to the Council as the negotiations proceed. And yet another way is to require a public hearing before they are adopted with plenty of time for review and amendments.

Scroll Down to Amendment Number 3

Scroll Down to Amendment Number 3

Scroll Down to Amendment Number 3

Amendment Number 3

The Findings of Fact described in the Staff Report Section H shall be considered as performance standards and conditions of approval. Any material changes in these facts shall require a modification of the Development Agreement to address any negative impact to the public.

Rationale:

Certain Findings of Fact are in dispute. For example, Finding of Fact Number 171 states that the projected number of new students that would be generated by the project is approximately 28. However, the student generation factor used is inaccurate.

The Snoqualmie School District's 2021 Capital Plan (page 22) uses a student generation factor for multi-family housing units of .306:
https://kingcounty.gov/depts/local-services/permits/planning-regulations/~/media/depts/local-services/permits/legislation-public-review/Att_E_SnoValley_DRAFT_2021_CFP.ashx

Applying this factor to the proposed 160 housing units yields an expected increase of 49 additional students.

This was a huge error on an important topic. We found other errors too.

This amendment would give the City options when it turns out that some of the assumptions, or Findings of Fact, are not actually facts.

Scroll Down for Amendment Number 4

Amendment Number 4

No conditions of approval or mitigations shall be finalized or vested in a long term Development Agreement contract for Phases 2 and 3.

Rationale:

Once conditions are finalized in the Development Agreement they are difficult to change and require approval from both the Developer and the City. Once a project is "vested", most laws and regulations applied to that project cannot be changed.

Since Phases 2 and 3 are not well defined and their uses are fairly speculative it is not appropriate to set development conditions or standards that remain unchanged for many years.

The PCI Plan approval should be of sufficient detail to direct the negotiation of the Development Agreement. Development Agreements are an extension of the City's contract authority.

The Development Agreement must not be used as a vehicle to evade a rigorous public review and SEPA process for the approval of development conditions and mitigations.

The PCI Plan should specify in more detail which issues will be addressed in the Development Agreement for Phase 1 and which will be addressed in Phases 2 and 3 because they should be fundamentally different. No conditions of approval or mitigations should be finalized in a long term Development Agreement contract for Phases 2 and 3.

Scroll down for Amendment Number 5

Amendment Number 5

Deviations from the Conditional Use Permit Process shall not be approved.

Rationale:

The SMC reads in part:

17.55.030 Conditional uses.

The purpose of a conditional use is to establish review and permit approval procedures for unusual or unique types of land uses in certain zoning districts which, due to their nature, require special consideration of their impacts on the neighborhood and land uses in the vicinity….

The level of detail that was provided by the Applicant was not sufficient to consider all of the special considerations that a Conditional Use process would provide. The staff report acknowledges this with its statement above regarding "design information about specific buildings has not yet been provided…"

In our submitted mark-up of the staff report we detail under each deviation request specific reasons for while the deviation is not appropriate. These start on page 17 of the staff report.

Scroll down for Amendment Number 6

Amendment Number 6

The Wetland, Flood, Stormwater, and Seismic Detailed Design Plans shall be Peer Reviewed by a consultant hired by the City at the Applicant's expense. The scope of these studies and the details of the funding arrangement shall be provided for in the Development Agreement.

Rationale:

The value of Peer Review is becoming more widely known and appreciated as technical and scientific reviews become more complex. It is widely used in a variety of government policy arenas including land use and development. You can read a good summary about Peer Review here: https://en.wikipedia.org/wiki/Peer_review

The issues listed above are particularly complex and critical to the community and its environment. Development Consultants, no matter how professional or ethical they may be, are subject to the ordinary pressures that are exerted by their clients. Their budgets and scopes of review are often limited. Their reports are subject to "lobbying" or even alteration by their clients. The result is that projects are usually presented in their most favorable light. This can lead to errors and omissions, and this can sometimes lead to disastrous consequence such as landslides, damaged natural systems, flooding, and severe traffic safety problems and congestion.

City staffs, especially in small cities usually do not have the staff to fully or even competently evaluate the technical documents that are submitted by specialized professional engineers. This is where Peer Review can provide the balancing analysis that best serves the Public Interest.

It is understandable that Applicants would not support Peer Review. For them it means cost and delay. But another motivation is all too prevalent. Sometimes Applicant's fully understand the limitations of their submittals and do not want these vulnerabilities exposed.

But Applicants with a commitment to the communities within which they do their projects will often embrace Peer Review. They know that it can reassure the public about the quality of their project. They know that a well- designed project is safe and desirable to their customers. And, they know that undisclosed or unknown technical problems can be very costly if they are not identified early in the development review process.

Amendment Number 7

Each Implementing Project that will generate traffic shall be evaluated for compliance with the City's transportation concurrency ordinance and shall demonstrate that Level of Service (LOS) standards will be met. Prior to the acceptance of an Implementing Project the City shall ensure that a complete and accurate traffic study has been completed and Peer Reviewed.

Rationale

As proposed, the Plan does not meet the City's transportation concurrency standards. State law requires that Cities must establish traffic congestion standards and then must ensure that all development meet those standards. The payment of a fee is not sufficient to demonstrate compliance. You can read about this here on the Municipal Research Services Center's website here: https://mrsc.org/Home/Explore-Topics/Planning/General-Planning-and-Growth-Management/Concurrency.aspx

Transportation concurrency is an important safeguard against unsafe and unacceptable traffic congestion.

As written the Plan appears to allow this proposal to evade transportation concurrency requirements by simply paying a fee. As the reference noted indicates, this is not consistent with State law.

Our Transportation engineers tell us that the City's traffic analysis for this project is very inadequate and inaccurate. The best solution for this is for the City Council to require a new Peer Reviewed traffic study.

In addition to requiring a new traffic study, the Council could mitigate this problem by simply making clear that the City will follow state law and its own code by requiring each and every permit application to comply with transportation concurrency.

Scroll down for Amendment Number 8

Amendment Number 8

The Development Agreement shall include the creation of a Toxics Pollution Review Commission to monitor and advise the City on the identification, remediation, mitigation, and control of toxic pollutants that are in the vicinity or on the project site. The Commission shall be appointed by the Mayor and confirmed by the Council. The Commission shall include, if available, experts in the field, local residents with knowledge or training in toxic pollution, the Snoqualmie Indian Tribe, the Applicant, neighboring jurisdictions and relevant agencies. The Development Agreement shall set forth the organizational details and funding for this Commission.

Rationale:

The issue of toxic pollution on this site is well known, but not well documented. The State Department of Ecology recognizes this site as one of the most polluted in the state.

It is likely that remediation studies and review processes will take many months, if not years. Work to clean up the site and its vicinity will likely take years. These are complex, multi-agency processes.

This proposed project is right in the center of this issue, physically and policy wise. Important decisions on Implementing Permits will need to be made and these decisions affect and are affected by the investigation and remediation effort.

The City would be well served by the creation of a Commission to engage with this issue for the long term. Since this development proposal is the central feature on this polluted site, it is reasonable that the Commission be created as part of the project's development review process.

The Development Agreement process is the appropriate venue to address the details and funding of this Commission. Since the project is seeking development on this polluted site there is a clear nexus for their financial support for its work insofar as their development is concerned.

Jason Rogers

From: snoqualmieaction@gmail.com
Sent: Wednesday, March 30, 2022 3:20 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan
Attachments: SCAN cover letter - comments for Snoqualmie Mill PCI Plan public hearing.pdf

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

Dear Ms. Berry,

Snoqualmie Community Action Network (SCAN) would like to provide input to the public hearing on the Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan.

Please find the cover letter for our comments attached to this email. In addition to comments within the cover letter, we submit four documents as part of our input. Due to the size of the files, these documents are provided in a cloud storage folder. The cover letter provides the link to the cloud folder, and describes the files in the folder. Please consider our public hearing submission to include the cover letter plus the four other documents.

Sincerely,
Snoqualmie Community Action Network

Jason Rogers

From: Auryel van Gemert <auryelross@hotmail.com>
Sent: Wednesday, March 30, 2022 3:24 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Planned Commercial/Industrial Plan PCI 17-0001

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

March 30, 2022
City of Snoqualmie
Office of the Hearing Examiner
MS Sharon A Rice
C/o Gwyn Berry
Transmitted electronically to gberry@snoqualmiewa.gov

RE: Snoqualmie Mill Planned Commercial/Industrial Plan
PCI 17-0001

My name is Auryel van Gemert, former President of the Snoqualmie Community Action Network and a current Climate Reality Leader for Al Gore's Climate Reality Project. I am a lifetime resident of Washington State and have lived in Snoqualmie for 5 years.

I would like to submit my comments on the above referenced project application. I incorporate in my comments the submittals of the Snoqualmie Community Action Network (SCAN) on March 30, 2022.

This development would forever change life in the Snoqualmie Valley.

As a community member, climate change and climate justice are of critical importance to me. I adore living in a valley that still feels lush and green with so much potential to be a community that can be rural and serve residents, respect its indigenous roots and history and be an area that prioritizes rights of nature and its citizens. We have so much green space to consider and a climate in crisis.

My primary concerns regarding this development are listed below.

- The Plan will increase flooding, significantly harm wildlife, increase air and light pollution, thus affecting nearby species of insects and amphibians. The Plan will likely harm the waterways from the Snoqualmie River to the Salish Sea.
-
- Alterations in wetland buffers are mentioned, 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." (pg. 14 Staff Report) – This is unacceptable and puts citizen's health and safety at risk due to buffers protecting the health of waterways, exacerbates the present climate crisis by further damaging our waterways, harming existing wildlife and increasing already to warm water temperatures. Items 44- 58 are flawed and present valid reason to deny the existing PCI Plan.

- The Site is the second most polluted site in the State, second only to Hanford according to the Department of Ecology. The Plan has virtually no meaningful data regarding the types and levels of toxic pollutants on the site. Instead, the Plan punts these issues to some future time and processes.

The plan is relying upon the developer to clean up the contamination on site. According to certification of contractors by the DOH:

Chapter 64.44 RCW

CONTAMINATED PROPERTIES

RCW 64.44.060

Certification of contractors, supervisors, or workers—Denial, suspension, revocation, or restrictions on certificate—Penalties—Fees.

A contractor, supervisor, or worker may not perform decontamination, demolition, or disposal work unless issued a certificate by the state department of health. The department shall establish performance standards for contractors, supervisors, and workers by rule in accordance with chapter 34.05 RCW, the administrative procedure act. The department shall train and test, or may approve courses to train and test, contractors, supervisors, and workers on the essential elements in assessing contaminated transient accommodations or property used as an illegal controlled substances manufacturing or storage site to determine hazard reduction measures needed, techniques for adequately reducing contaminants, use of personal protective equipment, methods for proper decontamination, demolition, removal, and disposal of contaminated property, and relevant federal and state regulations. Upon successful completion of the training, and after a background check, the contractor, supervisor, or worker shall be certified.

- The City should not make a decision on this Plan until all the toxic pollution information is documented and a remediation plan is approved by the Department of Ecology.

- Currently the developer is currently in litigation for improper management of toxins; Waste Action Project v. Snoqualmie Mill Ventures LLC. No plan should be considered nor approved until this lawsuit is settled. Snoqualmie Mill Ventures LLC are not trustworthy stewards of the environment.

- The Site is going to do massive grading. Protections for wetlands are compromised. Erosion control conditions are not strong enough for this site especially when considering the presence of toxic pollutants.

- The Plans conditions are so weak that there is a real risk of massive mudflows laden with toxic chemicals flowing into the Snoqualmie River and our groundwater with devastating consequences. This will risk the health and safety of local citizens, citizens downstream, rural farms and the Salish Sea.

- "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." (pg. 18 Staff Report)- this is a significant distortion as the health of the Snoqualmie River is in danger as it stands today. Please see the link to the full article, excerpt below:

"Over the past two decades water temperatures in the Snoqualmie and Skykomish River basins has frequently exceeded temperature criteria established to protect Endangered Species Act-listed Chinook salmon, steelhead trout, and bull trout. These rivers combine in Monroe, WA to form the Snohomish River, the second largest producer of Chinook salmon in Puget Sound. The effects of high water temperatures on Chinook salmon populations are considered to have negatively affected the health of ESA-listed Southern Resident Orcas, which rely on Chinook salmon as their primary food source." (USGS, Washington Water Science Center)

https://www.usgs.gov/centers/washington-water-science-center/science/water-temperature-mapping-snoqualmie-and-skykomish

This also applies to "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." (pg. 22 of Staff Report) – A false statement, such as, "If I throw chemicals in the river above the falls, it won't affect the water downstream."

- "The 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." (pg. 2 of Staff Report) – It is unacceptable to develop contaminated land to which the citizens of the City of Snoqualmie will then be responsible for. We can expect already high costs of living to grow to manage the congestion, pollution and need for services that this development will bring.

- "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." (pg. 19 Staff Report) -The preceding statement is an assumption. This project as it stands will severely impact water availability and costs for all citizen's not to mention the potential affect to the health of already limited available water.

- "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." (pg. 3 of Staff Report). – The EIS was inadequate as 90+ comments prove as such, many by environmental, traffic and wetlands professionals, The Snoqualmie Indian Tribe, and King County Agencies. The FEIS did not address a plethora of these comments, as required. Therefore, no PCI Plan should be approved until all issues and concerns regarding the EIS are addressed as the health and safety of citizens is at risk.
- "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." (pg. 22 Staff Report) -While this may be true, it will increase risks downstream, also increasing flooding downstream, affecting the health, safety and economic welfare of citizens of the lower Snoqualmie Valley.

- The PCI Plan references the EIS repeatedly and as stated above, the EIS was proven by professionally accredited responders to be inadequate. To state that all is well because the EIS says it is so is a gross misrepresentation of facts and can lead to the risk of citizen's health and safety.

- "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." (pg. 14) - The statement above is erroneous. A 70' building as proposed cannot be hidden, nor minimally visible. This project will be visible from the Snoqualmie Falls Park and the plan should not be approved as such, it will be a monstrosity and a disbenefit to the beauty of the Falls and the surrounding area.

https://kingcounty.gov/depts/local-services/permits/property-research-maps/property-specific-development-conditions/Psuffix/SnoqualmieValley/SV-P18.aspx

Description

Weyerhaeuser Mill

Development Condition Text

Weyerhaeuser Mill (Source: Snoqualmie Valley Community Plan and Area Zoning p.166)

I-P, M-P and RA-5-P, UR-P: These zoning designations recognize the Weyerhaeuser Mill in Snoqualmie as a resource-based industrial use. The mill is in the City of Snoqualmie Expansion Area 2, described on page 97 of the Snoqualmie Valley Community Plan. The RA-5-P, UR-P zoning is applied to land within the floodway. I-P, M-P zoning is applied to land outside the floodway. The following P-suffix conditions shall apply:

A._General

_1._Minimum 50' buffers on all property boundaries adjacent to residential areas.

_2._Joint planning between King County and the City of Snoqualmie is required for redevelopment of the mill site for uses other than forest products manufacturing pursuant to an interlocal agreement to be adopted by the City, the County and the property owner. The interlocal agreement shall provide for a review process under which:

__a._An application is submitted to both jurisdictions.

__b._The City shall provide its comments to the County.

__c._The County shall consider the City's comments and render a decision which it shall transmit to the City.

__d._The City shall approve or deny the County's decision in its entirety within 60 days, but may not modify its application to address those concerns. A modified application shall be subject to the review process outlined in paragraphs a-d.

_3._The City's review and approval or denial shall be governed by the following development standards. The interlocal agreement may elaborate upon these standards.

B._Public Services and Utilities

_1._The property owner shall pay its proportionate share of the capital cost of expansion of any city utility or service which is necessitated by the proposed development to ensure that burdens which would not otherwise occur will not be imposed on existing residents or facilities.

C._Compatibility

_As indicated in Policy SQP-79, the City and County recognize the historic industrial use and support continued industrial use of the property. Industrial use of the property other than forest product manufacturing should not be construed as a public nuisance per se were carried on in a reasonable manner and in compliance with any applicable regulations even though it may have impacts on nearby rural properties. Consideration shall be given to the existing rural, resource-related character of the City of Snoqualmie and to the nature and extent of impacts on surrounding properties.

D._Open Space

_A portion of the property shall be set aside for open space. Open space may include the floodway and trail along the Snoqualmie River.

E._Drainage Facilities

_1._A master drainage plan consistent with the criteria in the King County Surface Water Design Manual for the entire property shall be prepared.

_2._Surface water drainage control systems shall prevent the following unacceptable impacts:

__a._Aggravation of existing flooding problems;

__b._Destabilization of natural drainage systems;

__c._Unstable soil conditions; and

__d._Degradation of water quality in the Snoqualmie River.

F._Transportation

_1._A Transportation Plan shall be prepared which considers applicable City and County plans and policies.

_2._The property owner shall develop a Transportation Management Plan to minimize the necessity for single occupancy automobile usage. – (This has not been done.)

G._Sensitive Areas

_1._The old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and approved by the King County wetland biologist and Resource Planning Section staff.

_2._Bank restoration along the reach of the Snoqualmie River, if necessary, as a result of the proposed development.

_3._Public access along the Snoqualmie River and the southern portion of the old Mill Pond.

_4._The property owner will not oppose annexation if the proposed development requires extension of additional city services.

_5._P-suffix conditions apply to redevelopment of the mill site with other industrial uses, not forest product manufacturing.

_6._The rezone process may be used to modify the zone boundary based on additional information regarding the more precise location of the zero rise flood boundary.

Ordinance

12824

Effective Date

August 18, 1997

Changes

N/A

According to the linked Staff-Report-Appendix-B-Consideration-of-King-County-Zoning-P-Suffix-Conditions-PDF document below, "the old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and **approved by the King County wetland biologist and Resource Planning Section staff**."

"G._Sensitive Areas
_1._The old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and approved by the King County wetland biologist and Resource Planning Section staff." effective: August 18, 1997

_____

- The Public is promised a lovely tourist district but there are no guarantees or requirements that this will actually occur. Once the Plan is approved the developer could totally change the uses on site.

- The Public Hearing should be rescheduled or extended for several reasons:

1. A formal appeal has been filed in regards to the Final Environmental Impact Statement. No PCI Plan should be considered until the findings of the appeal have been made available to council and hearing examiner.

2. Mailed notices: ***affidavit*** of mailing is not on the website, mailing addresses are not correct, one 14 acre property owner was not on Exhibit D, which is not an affidavit of mailing (when mailed and who dropped it into the mail not there). Site addresses are described as mailing addresses (according to King County Assessor's database). All taxpayers and utility payers SHOULD be notified by mail for this public hearing because of the amount of city owned property within 500 feet of this historically large project for the region. The city council should expect to see the affidavit of mailing as part of the official record, if council members are doing their due diligence. Also, the ZOOM Link is very difficult to find.

3. Publication of the notice for the public hearing on March 14, 2022 and March 21, 2022 do not state the "place" of the hearing; instead, it refers to the city's website in general terms "Hearing information is published on the city's website". See screen shots below of published notices:.

   The published notice references https://www.snoqualmiewa.gov/393/Mill site-Property. From this part of the city's website, there is no information that contains the ZOOM link for the public hearing from this page of the city's website. Finding the link for some is extremely difficult, even for a resident familiar with the city's website.

   RCW 35.02.040

   Public hearing—Publication of notice.

   Notice of the public hearing by the county legislative authority on the proposed incorporation shall be by one publication in not more than ten nor less than three days prior to the date set for said hearing in one or more newspapers of general circulation within the area proposed to be incorporated. Said notice shall contain the time and **place** of said hearing. Place in this instance is the ZOOM LINK, which is absent.

- In addition, the plan was endorsed by Katherine Ross when serving as council member. This endorsement is on video and can be produced if needed. Ross states her wish that all council members support the project, as the city needs the money. This is a gross violation of her position at the time in a quasi-judicial matter.
- The existing PCI Plan puts the health, safety and welfare of the citizens of Snoqualmie and the lower valley at risk. It should not be approved.
- The time allotted to review the Snoqualmie Mill Staff report was inadequate. As such, I was only able to review the first 30 pages and felt I had to do this in an unorganized fashion. The community was not given ample notice, nor time to respond. I request this hearing be extended for that

reason, and to include findings from the SEPA appeal and the existing lawsuit filed against Mill Ventures. The approach to notify the public was inadequate and the links and materials needed for response were difficult to find and conflicting. This may be a violation of the Open Government of Washington and follow up on this possibility will be addressed.

Respectfully,
Auryel van Gemert
8305 382nd Ave SE
Snoqualmie, WA 98065

Jason Rogers

From: alenayuhl@gmail.com
Sent: Wednesday, March 30, 2022 3:29 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan

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

Good Afternoon,

We are writing in about this potential project, as are so very concerned to why we are giving up more of our beautiful land, to development. We moved here over 30 yrs ago as wanted to enjoy the rural & beauty of the area, as well as a slower, quieter life. It was such a great place to raise children, that it felt like they enjoyed a childhood like we once had.

This will bring in so much of what most of us wanted to get away from. Traffic will become even worse than it is already. We don't even get out to enjoy anything on the weekends anymore due to the traffic in downtown Snoqualmie & the Falls, and North Bend, as well as the hiking trails are packed. The Ridge has built up so much already, and Issaquah is close enough with everything needed there. There must be enough existing in those areas without bringing in more of the same.

Why do we want to take over more of our beautiful land, push more wildlife into the neighborhoods and outside of their own habitats, and bring in more traffic? Also, if this plan goes through, we expect the developers will be paying the bill for the increased traffic capacity, so that we the taxpayers, won't have another huge increase; as our taxes are too high already.

Very truly yours,
Alena & Brian Yuhl

Sent from Mail for Windows

Jason Rogers

From: Anna Boranian <howlin2@gmail.com>
Sent: Wednesday, March 30, 2022 3:30 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned /Industrial (PCI) plan
Attachments: Copy 1 of March 30 2022 letter to City of Snoqualmie.docx

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

Dear Ms. Berry,
Please find attached my letter for comments on the PCI PLan.

Sincerely,
Anna Boranian
Snoqualmie Community Action Network

March 30,2022
TO: City of Snoqualmie
Office of the Hearing Examiner MS. Sharon Rice
C/O Gwen Berry

RE: Snoqualmie Mill Planned Commercial/Industrial Plan PCI-17-0001

From: Anna Boranian
41829 SE 66th ST Snoqualmie, WA.
Vice President of SCAN

I am submitting my comments on the above referenced project application, strongly opposing the proposed development plan.

This statement is taken directly from the City's website:

"Protecting and preserving the natural environment in and around Snoqualmie is a top priority, one to which the City is fully committed. We strive to protect and enhance the health, beauty and eco systems of the City's stunning landscapes and natural environment."

Yet here we are the citizens of the valley and surrounding areas fighting to stop this irresponsible proposed development, that will forever change why we live in this beautiful place.

This proposed plan is in complete conflict with your above mission statement under Environment on the City website.

Snoqualmie is a rural area and should remain rural. The valley does not have the infrastructure to support this scale of a development financially or environmentally. The negative effect to the area i.e. increased traffic, noise, pollution, potential destruction of sensitive areas and the presence of harmful chemicals poses a grave threat to the Snoqualmie River and other waterways. The potential harm to human and wildlife health is also a huge concern. This site is the second most polluted site in the state second only to Hanford per the Department of Ecology. The City should not make a decision on the plan until all the known toxins are documented with more data on types and levels of toxins and a remediation plan approved by the Department of Ecology. There also needs to be addressed in the plan more protections for wildlife and wetlands.

The risk of contaminating the Snoqualmie River all the way to the Salish Sea and our ground water could be devastating with severe consequences. The plan does not adequately address the potential poisoning of the river and surrounding areas. The risk to the health of the valley due to this proposed development, if the City moves forward will not be able to be reversed.

The plan will increase flooding significantly, harming many species of plants, insects, amphibians and the farmlands.

The increase in traffic in the valley is already a concern. This plan will only add to this. There are times I take my business out of the valley due to how hard it is to find parking and get around the traffic mess. With more increased traffic, the potential for more air pollution is inevitable, which in turns effects human health and the health of the valley.

I'm also concerned that if the plan is approved, the developer could change the plan to how he sees fit. We are promised a great tourist area, but with no guarantees or requirements that is what we would get. This is very disturbing.

The plan was worked behind closed doors without any meaningful community input until it was released to the community during the Christmas holiday season, which gave us little to no time to reply via comments in a strategic manner or having time to do much research.

The developer is currently in litigation for improper management of the toxins. Waste Action Project v. Snoqualmie Mill Ventures LLC. NO plan should be considered nor approved until this lawsuit is settled. Snoqualmie Mill Ventures LLC are not trustworthy stewards of the environment. Also, the plan should not be approved until the finding from the SEPA appeal is completed.

I've lived in the Snoqualmie Valley for 35 years and the reasons I still live here is due to its beauty, wildlife, river and the mountains. If this proposed plan is approved, all this will be forever altered and devastating to the area and my well-being.

I believe there is a recorded statement from Mayor Ross endorsing the project when she was on council, should her vote be counted?

There was not adequate notification of this meeting, for the community to put together their comments without being rushed. There also was not adequate time to review the Snoqualmie Mill Staff report in order to address issues in a mindful manner. The time of the meeting 4-6pm leaves many people unable to attend as this is during working hours and most likely family dinner time for some. There are also mixed messages on how to access the meeting, some say you need to register, other messages do not include this? If any of the above becomes an issue, this will be reported to the Washington State Open Government. This is a common occurrence with our City and needs to change, as you work for the citizen's and our voices should be heard.

" I incorporate by reference in my comments the submittals of the Snoqualmie Action Network (SCAN) on March 30, 2022"

Let my Voice be heard.

Respectfully,

Anna Boranian

Jason Rogers

From: WAYNE RUSSELL <waynestuff@comcast.net>
Sent: Wednesday, March 30, 2022 3:28 PM
To: Gwyn Berry
Subject: Hearing Mill Site PCIP/FEIS 03/30/2020 updated version
Attachments: Environmental-Activity-and-Remediation_Staff-Summary_09222011.pdf; R10-1335783.pdf 1989 fire.pdf; Cashmere Mill Site cleanup.pdf; Wayne's GPS Elevation.pdf; 20220330_102232.jpg

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

Having lived on Meadowbrook Way SE since 1984 we have grave concern about the proposed Weyerhaeuser Mill Site project by Mill Site Ventures development Proposed Commercial/Industrial Plan (PCIP) submitted to the City of Snoqualmie and already requesting deviations from city code per the supplied city staff report.

We have experienced flooding, higher traffic volumes with the first and second remodels of the Mt Si High School along with the rebuilding of the Meadowbrook bridge from two lane to one lane making it a signal one lane-controlled bridge.

When the mill was fully functional, we had three shifts per day using Meadowbrook Way along with high school/elementary school with tourist and golf course traffic. With the new Mt Si High School, we now have traffic jams at present on one of the two accesses to the Mill Site twice a day. The other access of Tokul road round-about on Hwy 202 has weekend traffic jams and traffic direction by law enforcement when large volumes of visitors are expected to Snoqualmie Falls. There is inadequate access to the site for this large-scale development.

The mill experienced a major fire of the plywood plant in 1989 which caused the release of PCBs from transformers and other pollutants into the soil and drainage to Borst lake (Mill Pond) and per attached documents may have caused these pollutants to enter the pond? Also, these same documents specify that ground water contamination may also occur.

Adding to this is the problem that after logs floated out of the log holding area during the 1984,1985 and 1990 floods a berm was placed from the Mill Pond to the haul road that entered the Mill Site to prevent re-occurrence. Berm was installed without proper permitting and allowed unseen fill behind the berms to the elevation in Planning area one which is also the Dirt Fish Rally School and present-day fill is to the top of the berm. According to the pre-annexation agreement all fill was supposed to be removed.

We personally know the elevations were added since we cut firewood and equipment would haul the wood to the edge of the sort yard since Weyerhaeuser allowed fire wood cutting on a small drive paralleling the Mill Pond Road approximately 100 yards or so long. You could see the equipment and workers moving the wood in the sort yard and delivering wood to the fire wood cutting area.

The significantly added fill affects the flooding of the City and surrounding areas along with raising the elevations to the Base Flood Elevation (BFE) of 423’ on the proposed Planning area one to make the area salable as a FEMA floodplain vice Floodway designation for building purposes per the Flood Insurance Rate Maps (FIRM). Developing and building are significantly different under these circumstances.

The irony of this is the City of Snoqualmie had a Letter of Map Revision (LOMR) done in 2010 for the remodel of Historic downtown but also included the Mill Site side of the river when it was not part of the city at the city's expense. It also appears from King County records that Mill site Ventures purchased the property in 2010. We asked Mark Hoffman about this when we were at a meeting with him and he stated “If we do one side of the river why not the other?” The concern was why we paid for it when it didn’t belong to us and was the proposed development in planning, since owners wanted to open a Rally Race Track that was not allowed under county code.

Trucks were noticed by the jersey barriers along the Mill Pond Road in 2020 and noticed barriers were moved which is access to the Planning Area 1, so Mark Hoffman was informed because of the previous work done without permits for parking for the Boeing Classic Golf tournaments by the owners and only reported by citizens to the city for action. At a city council meeting Mr. Hoffman was asked about what was going on. We were told a Puget sound Energy vehicle had a sensor go off that indicated a gas leak but no main was in that location. Mr. Hoffman said a private contractor was called in and was going to furnish us with the information of the contractor, since it appeared it was swamp gas but we were never notified.

The staff report indicates “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.” Where is the swamp gas emanating from if the log debris has 6’ to 20’ of fill has been added over the log storage area in Planning area 1 as suggested by the Final Environmental Impact Statement (FEIS). Was this determined without a study and if one was done where are the results?

The project also calls for the realignment of Mill Pond Road which places it and the suggested roundabout at the BFE (Base Flood Elevation) of 423’ to accommodate a wildlife passage and flood out flow to the Snoqualmie River. This will be done with major excavating and fill to accomplish this objective. Also, the excavating and grading of footings will disturb this possibly contaminated soil. Attaching information on a study done at the Cashmere Mill Site which shows what could be underlying concerns.

Some of the wetlands and drainage systems go to Borst lake which drains into the Snoqualmie River. The lake level was normally maintained by a Weir (dam) constructed by Weyerhaeuser which at some point was filled in with rock by someone? This has caused a breech in the berm east of the weir that now maintains the lake level and in summer dry months the lake is significantly lowered to where water only migrates through ground at the breech since it is below the grade to make it to the culvert under the Mill Pond Road.

After conversing with National Flood Insurance Plan (NFIP) folks who furnished us with an interactive United States Geological Survey (USGS) topography map with elevations given over time which we have attached a link for it is of notice what the elevations are in the proposed development areas over time compared to what is existing. At Mill Pond Road level the elevation is 406’ and by scale same existing level in past the berm that is to be removed as well as the realignment of the Mill Pond Road as described in the PCIP and the FEIS. All these elevations are well below the BFE prior to the berm installation. Along with the topography map I am including a study we did using three different types of GPS devices of the elevations throughout the city of Snoqualmie and furnished to both the City Council and Planning Commission at regularly scheduled meetings in the past.

The elevations on map as well as GPS readings on Mill Pond Road are relatively close at 406’. Please note the photo taken this morning 03/30/2020 attached that the traveled entrance to Dirt fish is well above the level the photo is taken from.

We also incorporate by reference items Snoqualmie Community Action network (SCAN) has submitted today

Thank you for your time and consideration of these issues,
Wayne A Russell

8438 Meadowbrook Way SE
Snoqualmie, WA 98065
email: waynestuff@comcast.net
Phone: 425-888-4789

PLANNING DEPARTMENT

38624 SE River Street
PO Box 987
Snoqualmie, WA 98065

425-888-5337

www.ci.snoqualmie.wa.us
info@ci.snoqualmie.wa.us

STAFF SUMMARY OF FORMER WEYERHAEUSER MILL SITE

REPORTED ENVIRONMENTAL ACTIVITY & REMEDIATION

SEPTEMBER 22, 2011

City of Snoqualmie staff reviewed several files provided by the EPA and property owner regarding the environmental impacts and remediation activities on the old Weyerhaeuser Snoqualmie Mill Site. Multiple locations on the site could have soil, surface water and groundwater impacts due to the presence of different fuels, chemicals and other fluids stored or used onsite. However, six areas stand out for reported potential impacts and remediation activity: (1) the Former Under- and Above-ground Storage Tanks (UST/ASTs); (2) the Former Plywood Plant; (3) the "Morbark" Area; (4) the Powerhouse & Sawmill; (5) the Lumber Strapping Area; and (6) the PCP Dip Tanks. This document summarizes the remediation guidance, contaminants and known status of the site.

The Washington state Department of Ecology (Ecology) regulates and guides needed site Cleanup Levels (CLs) via MTCA, the Washington State Model Toxics Control Act of 1989.[1] The presence of contaminants does not by itself indicate the need for remediation; it is only when contaminant concentrations reach certain thresholds that they trigger a need for monitoring or removal, usually when they may be of an environmental or human health concern. MTCA provides three methods to determine if cleanup is necessary, the default Method A with specific maximum concentration limits (MCL) per contaminant, and Method B/C, which sets alternate contaminant levels (ACLs) based on the associated risks of actual/future site activity.[2] MTCA is essentially the state counterpart to CERCLA,[3] the federal Superfund law that also provides cleanup guidance. The old Weyerhaeuser Mill Site underwent a Preliminary Assessment (PA) in the Superfund data system CERCLIS in 1991, however it resulted in a "No Further Remedial Action Planned" (NFRAP) designation.[4] As such, cleanup activities would likely move from the EPA to the Department of Ecology (Ecology). The site did not proceed to a Site Inspection, and did not enter the National Priorities List (NPL); NPL sites are what are typically referred to as "Superfunds" in the EPA.[5] Overall, the site is essentially a brownfield, or an "Abandoned, idled or under-used real property where expansion or redevelopment is complicated by the presence **or potential presence** of environmental contamination" (emphasis added).[6]

When contamination is suspected or determined, a landowner may undertake voluntary remediation. Most cleanups within Washington State are Voluntary, without issuance of enforcement orders (for cleanup) from Ecology. This allows site owners more flexibility and often reduces cost, but does not provide binding agency assurance of a cleanup's adequacy.[7] Ecology has various opinion letters it can issue for voluntary clean-ups; one commonly known as a "no further action" letter is often seen as the equivalent that a voluntary cleanup has met with Ecology approval, and that no further work is necessary. It appears that a "no further action" letter was *not* pursued/obtained for this site, reportedly due to associated legal costs.[8] Under Ecology, sites undergo an initial investigation (II), receive a Site Hazard Assessment (SHA) and hazard ranking score under WARM (Washington Ranking Method), which ultimately determines whether a site will be listed on the State Hazardous Sites List (HSL). Ecology records show the Weyerhaeuser site has been awaiting a SHA for an indeterminate period.

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[1] In some reports, TSCA or the federal Toxic Substances Control Act of 1976 also guided some cleanup levels.
[2] Delta Environmental Consultants, Inc., "Level II ESA Report," 2004, p.12.
[3] The Comprehensive Environmental Response, Compensation and Liability Act
[4] EPA Region 10 staff correspondence, 05/19/2011 letter
[5] Phone conversation US EPA Region 10 staff representative.
[6] U.S. Department of Housing and Urban Development, "Brownfield Definition", content last updated 7/30/ 09. http://www.hud.gov/offices/cpd/economicdevelopment/programs/bedi/bfieldsdefinition.cfm. Cited 07/18/11.
[7] Howard F. Jensen, HCMP Law Offices, "Frequently Asked Questions About the Washington State Model Toxics Control Act." http://www.hcmp.com/index.php?p=1_114-Frequently-Asked-Questions-About-the-Model-Toxics-Control-Act. Cited 7/15/2011.
[8] Phone conversation with Weyerhaeuser staff reported that a No Further Action Letter was not pursued due to projected costs.

The identified Contaminants Of Concern (COC) at each location of the old Weyerhaeuser Mill site vary depending on the associated activities. Those listed most include **BTEX** or the gasoline components Benzene, Toluene, Ethylbenzene and Xylene; **TPH/T(E)PH & DRO** or Total (Extractable) Petroleum Hydrocarbons and Diesel Range Organics; **PCP** or Pentachlorophenol; **T/TCBs** or tetra/tri-chlorinated benzenes; and **PCBs**, or polychlorinated biphenyls. Although not as emphasized in the reports, there is some evidence of heavy metals, including arsenic and lead and, to a lesser extent, copper, zinc and cadmium. Asbestos was also mentioned, but appeared addressed under a site-wide remediation program.[9] Location-specific summaries are as follows:

(1) Former Under- and Above-ground Storage Tanks (UST/ASTs) areas were noted for contamination from BTEX (groundwater) and TEPH & DRO (soil; groundwater). Between 1989 and 2005, about 8,387 cubic yards (CY) were processed and, at final testing, soils tested below Method B levels.[10] The process was designed to remove groundwater impacts as well, though the reviewed reports do not indicate that a recommended[11] new S/SW downgradient monitoring well was installed to obtain final groundwater results.[12] The Level II ESA also noted that there were impacted soils under nearby roadways; it is unknown if final soil removal addressed these areas.[13]

(2) The Former Plywood Plant was the site of a 1989 fire, where falling debris damaged the secondary bushings of two transformers (T-17 & T-12) and led to TPH, TCB & PCB contamination.[14] A former Press Pit area remediation achieved TPH soil cleanup targets though no groundwater analysis was conducted, and debris was buried.[15] The PCBs at T-17 were remediated to federal TSCA guidelines by June 6, 1989, and investigations closed,[16] though soils may have been remediated at the T-17 location only to federal levels at the time (50 ppm), which may not meet state standards.[17] Official closure of the other transformer (T-12) site was not possible due to elevated PCB levels in the underlying clay layer.[18] Site treatment included removing 60 CY of soil; excavation was halted so as to not breach the clay lens, whose presence prevented a PCB groundwater release. The site was capped with a geotextile in 1991[19] and, following 1995 reports that PCBs had not migrated into groundwater at the T-12 area,[20] Weyerhaeuser notified EPA Region 10 that No Further Action (NFA) would be taken, though no known response was received from EPA.[21] It is uncertain if the geotextile cap is large enough.[22] It was advised to still pursue a NFA letter from the EPA for this area, and that analysis of PCB pyrolysis isomers may be appropriate, along with deed restrictions, legal area delineation and setting a MTCA B/C ACL.[23] Today the area remains fenced and is posted as a PCB spill area.[24]

(3) The "Morbark" Area had machinery that leaked lube oil, leading to TPH & DRO soil and groundwater impacts.[25] From 1998 to 2004 approximately 2,600 CY of soil was excavated.[26] Tests in 1998 met MTCA A groundwater levels for TPH; MTCA B DRO levels were met in 2004[27] and MTCA B TPH levels were met in 2006.[28] No apparent issues remain at this location.

(4) The Powerhouse & Sawmill area contained the sawmill sash gang and log haul, the powerhouse T-7 transformer, a 50,000 gallon AST and a hog fuel ash area. For most locations, TPH & DRO were the main Contaminants of Concern (COC) in soil/groundwater. Between the log haul and sash gang areas, approximately 1,000 CY of soil were removed; final results showed soils below the MTCA B TPH CLs[29] and that groundwater samples under the sash gang were below MTCA Method A CLs.[30] It is unknown if groundwater under the log haul area is free of DRO as the groundwater sample yield was too low for analysis.[31] The T-7 transformer was tested and found to be PCB free,[32] and the AST area likewise tested free of contamination.[33] In 2003, a Boiler Ash Fill Area was identified west of the former sawmill building,[34] with several soil samples testing above benzo(a)pyrene MTCA A levels and Arsenic detected at 180 mg/kg, above the MTCA A cleanup level of 20 mg/kg.[35] In a later ESA, the ash volume was estimated at 6,000 CY;[36] it was

[9] Shannon & Wilson Inc., "Level I EA (Environmental Assessment)," 1993, p. 10.
[10] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.2.
[11] Advised in the letter to Ms. Bariska of Weyerhaeuser accompanying the 2005 Supplemental ESA for the UST/AST Area, by Delta Environmental Consultants. July 19, 2005, p. 3.
[12] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.8,9 (sections 4.4; 4.7.1; 5.0).
[13] Delta Environmental Consultants, "Level II Environmental Site Assessment (ESA)," 2004, p. vi, 5.
[14] Ecology & Environment, Inc., "Preliminary Assessment Report, Weyerhaeuser Co. Snoqualmie, WA," 1991, p. 5.
[15] Shannon & Wilson Inc., "Level I EA," p. 4, 5. A CL of 200 ppm was set, below the MTCA A CL of 2000 ppm, as of 2005.
[16] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[17] Shannon & Wilson Inc., "Level I EA," 1993, p. 2.
[18] Shannon & Wilson Inc., "Level I EA," 1993, p. 2, 3.
[19] Shannon & Wilson Inc., "Level I EA," 1993, p. 3.
[20] Dalton, Olmstead & Fuglevand, Inc. Environmental Consultants, "Additional Assessment of PCB Contamination T-12 Area, Weyerhaeuser Snoqualmie Mill Site," 1994, p.2, 3 & Executive Summary.
[21] Delta Environmental Consultants, "Level II ESA," 2004, p.13.
[22] Dalton et al., "Additional Assessment of PCB Contamination T-12 Area…" 1994, 3.
[23] Delta Environmental Consultants, "Level II ESA," 2004, p.13, 14.
[24] Delta Environmental Consultants, "Level II ESA," 2004, p. 5.
[25] Delta Environmental Consultants, "Level II ESA," 2004, p. 4.
[26] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p.5. & Pacific et al"Permit Closure Report: King County," 2006, p.6.
[27] Delta Environmental Consultants, "Level III Environmental Site Assessment (ESA)," Dec. 2004, p. 21.
[28] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6.
[29] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.5.
[30] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, vi, 12.
[31] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 13
[32] Delta Environmental Consultants, "Level III ESA," Dec. 2004, vi, vii
[33] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. ii, 14
[34] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. 7
[35] Delta Environmental Consultants, "Level II ESA," 2004, p. 9

recommended it be handled according to Ecology regulations.[37] In addition, a 1993 report stated that semi-volatile compounds were detected in the Sawmill/Powerhouse area; it is unknown if these last two items were addressed based on reviewed reports.[38]

(5) The Lumber Strapping Area had a hydraulic oil spill at this location, leading to DRO and heavy oil hydrocarbons testing above MTCA A CLs in soil and TPH in groundwater.[39] In 2006, 751 CY of soil were excavated and most subsequent soil samples tested below MTCA B CLs, though one location still exceeded the MTCA B CL. [40] Earlier tests also showed TPH-D and TPH-O (-Diesel & Oil) groundwater impacts;[41] it is unknown if these issues have been addressed.

(6) There were 2 PCP Dip Tank areas identified as potentially contaminated with PCP. While the PCP Dip Tank area 2 tested free of phenolic compounds,[42] Dip Tank area 1 contained PCP groundwater concentrations that exceeded the MTCA Method B CL; results indicate that groundwater impacts were localized near the former dip tank and have not migrated downgradient.[43] It is unknown whether PCP contamination in this area has been addressed.

In addition to the above, the following areas may need further redress: groundwater DRO/TPH at the former vehicle wash pad;[44] T-18 DRO/TPH surficial soil impacts;[45] investigation of roadway surface oils, mill ditch system sedimentation,[46] and sampling of log pond sediments.[47]

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[36] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. v
[37] Delta Environmental Consultants, "Level II ESA," 2004, p. 13
[38] Shannon & Wilson Inc., "Level I EA," 1993, p. 14, 15
[39] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. iv, vi, 17, Table 11. Reports on groundwater contamination appear to conflict within ESA III, but tabular data results confirm TPH results exceeding MTCA A CLs
[40] Pacific Environmental & Redevelopment Co., "Permit Closure Report: King County," 2006, p.6, 8.
[41] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area ... July 19, 2005, p. 3&4
[42] Delta Environmental Consultants, "Level III ESA," Dec. 2004, p. v, 19
[43] In the letter to Ms. Bariska, accompanying the 2005 Supplemental ESA for Former Lumber Strapping Area ... July 19, 2005, p. 3.
[44] Delta Environmental Consultants, "Level II ESA," 2004, p.11 & Delta et al., "Level III ESA," Dec. 2004 p. iv-vii, 8, Table 13.
[45] Delta Environmental Consultants, "Level II ESA," 2004, p. iv, 7, 17
[46] Shannon & Wilson Inc., "Level I EA," 1993, p. 12, 13
[47] Shannon & Wilson Inc., "Level I EA," 1993, p. 12 & Dept. of Ecology, "Snoqualmie Facility Class II Inspection, 2/9/93," 1994, 22.

Assessment of PCB Contamination

Snoqualmie Falls Plywood Plant Fire Site

for

Weyerhaeuser Cascade Division

H D R

Attachment No. 4

USEPA SF
1335783

ASSESSMENT OF PCB CONTAMINATION

WEYERHAEUSER'S CASCADE DIVISION
SNOQUALMIE FALLS
PLYWOOD PLANT FIRE SITE

for

THE WEYERHAEUSER COMPANY

by

HDR ENGINEERING, INC.
BUILDING C - SUITE 200
11225 S.E. SIXTH STREET
BELLEVUE, WASHINGTON

MARCH 1989

CONTENTS

		Page
LIST OF FIGURES		
LIST OF TABLES		
1.0	INTRODUCTION	1
1.1	PURPOSE	1
1.2	SITE DESCRIPTION	2
1.3	CLEANUP ACTIONS TO DATE	2
1.4	REGULATORY OVERVIEW	5
2.0	SAMPLING PROGRAM SUMMARY	7
2.1	PLANNED FIELD ACTIVITIES	7
2.2	ACTUAL FIELD ACTIVITIES	8
2.3	GENERAL SITE ACTIVITIES	8
2.4	SAMPLING ACTIVITIES CONDUCTED BY WEYERHAEUSER	9
3.0	SITE INVESTIGATION RESULTS	10
3.1	SOLID SURFACES	10
3.2	SOILS	12
3.3	ASH	17
3.4	GROUNDWATER	17
3.5	QUALITY ASSURANCE REVIEW OF PCB ANALYSES	19
4.0	EXTENT OF CONTAMINATION	21
4.1	SOLID SURFACES	21
4.2	SOILS AND GROUNDWATER	22
5.0	CONCLUSIONS/RECOMMENDATIONS	24
5.1	CONCLUSIONS	24
5.2	RECOMMENDATIONS	24
6.0	REFERENCES	27
APPENDICES		

LIST OF FIGURES

		Page
1.1	Location Map - Snoqualmie, Washington	3
1.2	Site Map	4
3.1	Transformer Pad T-12: PCB Concentrations at Sampling Stations (ppm)	13
3.2	Transformer Pad T-17: PCB Concentrations at Sampling Stations (ppm)	14
3.3	Transformer Pad T-12: Estimated PCB Concentration Gradients (summed over all sampling depths) (ppm)	15
3.4	Transformer Pad T-17: Estimated PCB Concentration Gradients (summed over all sampling depths) (ppm)	16

LIST OF TABLES

		Page
3.1	Summary of PCB analytical results for soil and wipe testing: Transformer Pads T-12, T-16 and T-17.	11
3.2	PCB Concentrations in Ash Samples	18

1.0 INTRODUCTION

This project was conducted for the Weyerhaeuser Company to help expedite containment and removal of fire debris and contaminants at the Cascade Division's Snoqualmie Falls Mill. During the late evening hours of February 5th, 1989, a fire erupted at the plywood manufacturing facility located in the southeast portion of the mill grounds. The large, 160,000 square ft. wood-framed building was a complete loss; as fire fighting efforts were hampered by extreme cold weather and frozen water supply mains.

High voltage electrical equipment serving the plant's numerous industrial motors and lighting systems included three askarel-filled [polychlorinated biphenyl (PCB) - bearing cooling fluid] pad-mounted transformers. Although these transformers were located outdoors, they were sufficiently close to the building to be exposed to heat and falling debris. None of the transformers catastrophically ruptured, although two had some observed leakage (estimated to be 5 to 10 gallons) around the porcelain secondary bushings.

Other materials of concern involved in the plant fire included asbestos roofing felt, production materials (glues, patching compounds, etc.), waste oils, and inventories of small-container items (paints, lube oils, etc.).

On February 14, 1989, Weyerhaeuser Company contracted with HDR Engineering, Inc. (HDR) to assist in evaluating PCB-contaminated materials at the site.

1.1 PURPOSE

This report addresses three project objectives:

1) Evaluation of the results of field sampling conducted by HDR Engineering at three former PCB equipment locations,

2) Summary and evaluation of PCB sampling results provided by Weyerhaeuser,

30 Recommendation of additional measures to resolve the PCB contamination problem at locations where PCBs are present above acceptable levels.

The purpose of this project was to determine the residual levels of PCBs that remained in the spill areas after the initial emergency cleanup (stabilization) actions. If

warranted, additional cleanup and/or testing measures are to be recommended based on results of the field sampling and observations.

1.2 SITE DESCRIPTION

The mill is located near the town of Snoqualmie, Washington at the foot of the Cascade mountains in King County (Figure 1.1)

There are several surface water features in the vicinity of the mill, including the Snoqualmie River and the log pond to the south (Figure 1.2). Trenches and shallow excavations in the vicinity of the plywood plant indicate that a shallow (and possibly perched) groundwater aquifer exists under the site at a depth of approximately 2 ft at the two soil sampling sites. The piezometric gradient and direction of flow of this groundwater layer is currently unknown. However, it is likely that the extensive concrete foundations of the plywood plant create a slight depression in the piezometric surface, due to exclusion of infiltration by rainfall. This would result in a localized tendency for materials on or in the water to flow toward these areas.

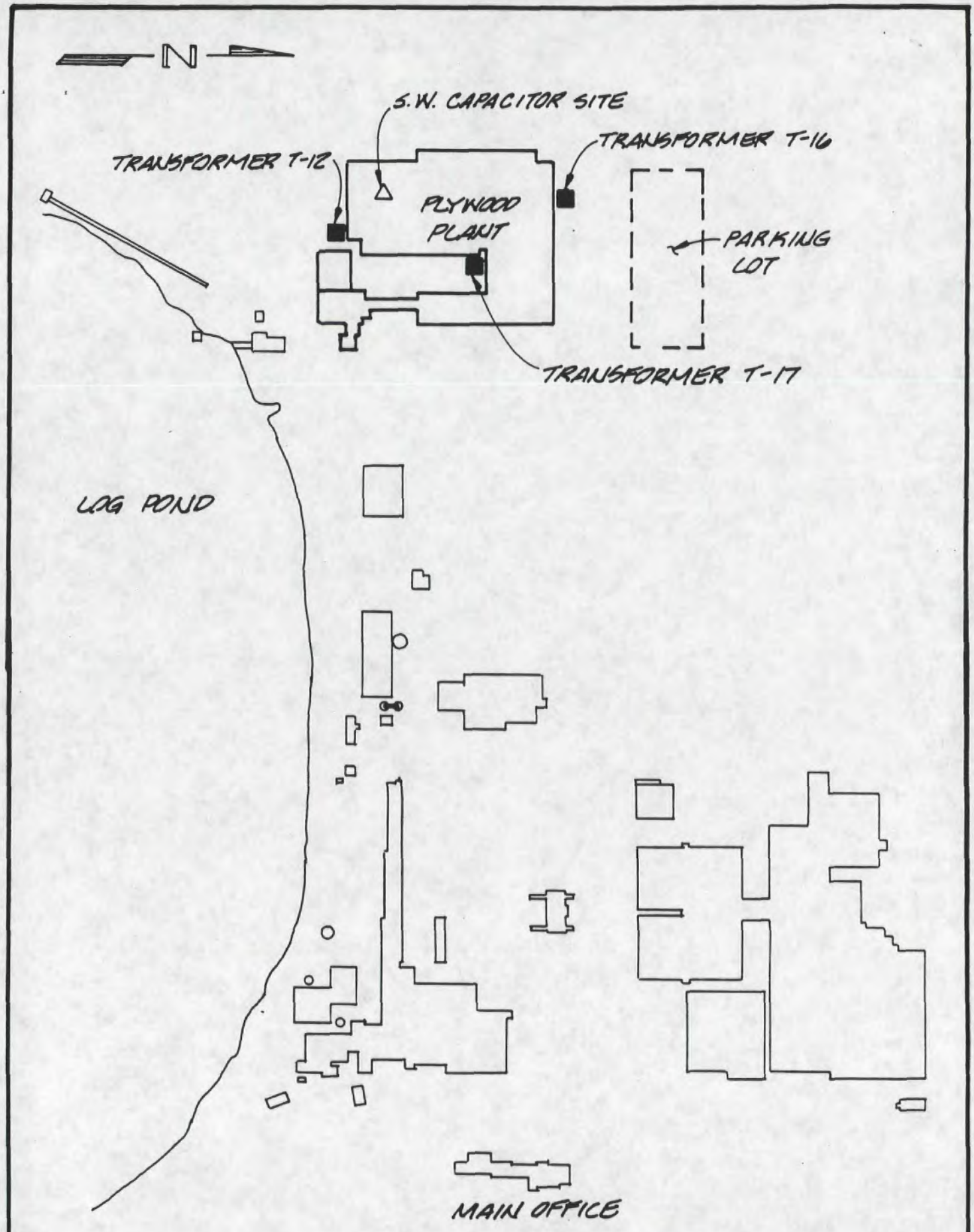
1.3 CLEANUP ACTIONS TO DATE

Three transformers serving the plywood plant contained varying amounts of askarel:

Device	Volume of Askarel (gallons)
Transformer T-17	454
Transformer T-12	454
Transformer T-16	270

Figure 1.2 shows the locations of these units. Transformer T-16 did not release any dielectric fluids and was removed as a PCB inventory reduction measure. Wipe sampling was conducted on the concrete pad at T-16 to verify the absence of PCBs.

A suspected PCB high-voltage capacitor at the plant was burned in the fire, although subsequent sampling by Weyerhaeuser did not show traces of PCB or PCB combustion products on or near this device. The unit was subsequently secured in a 55-gallon drum by the cleanup contractor and transported to General Electric's TSD facility for storage and disposal (Olympus Environmental, Inc. 1989).



SITE MAP **FIGURE 1.2**

After the fire was extinguished, Weyerhaeuser personnel installed emergency containment directly under the leaks to contain residual drippage. By February 13th, General Electric, Inc. in cooperation with Olympus Environmental Inc. (a cleanup contractor), drained the askarel from the three transformers. Carcasses and drummed fluids were released by Weyerhaeuser for transport to General Electric's facility in Portland Oregon in preparation for final disposal in accordance with the Toxic Substances Control Act (TSCA).

After removal of the transformers, the cleanup contractor removed debris in the interiors of the curbed areas surrounding the units. They removed the contaminated concrete curbing and soil immediately surrounding the structural (3 ft thick) concrete support pad. Since removal of the massive pads was not feasible at the time, the top 0.5 inch was removed using an air chisel. All waste was placed in DOT-approved drums and moved to the on-site hazardous material storage facility. The concrete and soil removal activities at Transformer Pads T-17 and T-12 generated approximately sixteen 55-gal drums full of assumed PCB-contaminated solids (Olympus Environmental, Inc. 1989). The excavated areas were covered with waterproof tarps to minimize infiltration.

A chronology of events occurring after the fire incident is included in Appendix A.

1.4 REGULATORY OVERVIEW

Regulations regarding accidental releases and cleanup of PCB fluids from in-service electrical equipment are set forth under the Toxic Substances Control Act, 40 CFR, Part 761. Subpart G defines the Spill Cleanup Policy for restricted access locations as follows:

> "...(iv) Low-contact, outdoor surfaces (both impervious and non-impervious) shall be cleaned to 100 ug/100 cm^2 ..... (v) soil contaminated by the spill will be cleaned to 25 ppm PCBs by weight."

According U.S. EPA Region 10, spills of PCB fluids that contaminate shallow groundwater systems may be of additional concern if such contamination could reasonably be expected to impact adjacent surface or groundwater resources, or drinking water wells. In such cases, remedial measures beyond the scope of that addressed under TSCA may be required. The need for additional monitoring or remedial measures would also be based on an assessment of:

- The effectiveness of removing the contaminant source (i.e. excavation of the contaminated soil)
- The estimated volume of residual PCBs and ability to migrate through the groundwater
- The feasibility, cost, and effectiveness of additional measures.

2.0 SAMPLING PROGRAM SUMMARY

2.1 PLANNED FIELD ACTIVITIES

The sampling program for the three transformer locations was devised to maximize the amount of data that could be obtained (both horizontally and vertically) with a minimum number of samples, while providing adequate coverage of the area. The proposed program was documented in the written sampling plan prepared prior to mobilization (HDR 1989).

The sampling locations at each transformer site were oriented in an "adjusted" grid system based on standard procedures for station positioning (U.S. EPA 1985 and 1986). Where soil sampling stations fell on concrete foundations, 1) a sample of ash was obtained for analysis, and 2) an additional (offset) station was located at the nearest soil area to obtain a sample.

Samples at depth were planned for stations immediately under and adjacent to the observed locations of askarel leakage.

The original inventory of planned samples included the following:

- Twenty-one surface soil samples (0 - 3 inches)
- Eight soil samples at 1 ft depth (9 - 12 inches)
- Eight soil samples at 2 ft depth (21 - 24 inches)
- Seven ash samples from stations within the fire site interior.

All samples were labeled according to the following format:

AA-NN-MM-LL-D

where:

A	=	Area (areas 12, 16 or 17)
N	=	Station Number
MM	=	Media type (SL = soil, AH = ash, WA = water)
L	=	Level (S = surface, SS = subsurface)
D	=	Depth (0 = 0 to 3 inches; 1 = 19 to 12 inches; 2 = 21 to 24 inches).

2.2 ACTUAL FIELD ACTIVITIES

The general sampling strategy proposed in the sampling plan was maintained to the greatest extent possible. However, some modifications were made in the field. Significant modifications involved the subsurface soil sampling activities. Since some of the selected stations were in areas of soil removal, sampling was initiated at the bottom of these cuts. Hence, some stations may indicate a sample from the two-foot level, with no samples obtained for the shallower 1-ft or surface levels. At some stations, adjustments were made to obtain soil samples from the faces of these excavations at the appropriate elevations. A listing of the actual soil samples obtained and submitted for analysis is included in Appendix B.

Another modification to the plan resulted when Weyerhaeuser requested wipe sampling at transformer pad T-16. This was performed using hexane-soaked gauze pads and wiping a measured square area of 100 sq. cm. The pads were immediately placed in the same type of glass sample jar used for soil samples and included in the sample inventory. The wipe tests were performed in accordance with Section 761.123 of TSCA.

The method for obtaining soil samples at depth was modified to more effectively penetrate past large cobbles. A digging bar was used to remove soil to the just above the desired sampling depth. A decontaminated trowel was then used to remove soil to the sampling depth. The sample was then obtained using the basket auger as specified in the sampling plan.

Sampling station locations were accurately located in the field in relation to the nearby plant foundations using a 100-ft surveyor's measuring tape.

2.3 GENERAL SITE ACTIVITIES

The HDR field sampling team arrived at the site on February 16, 1989. A visual survey was conducted to orient team members, and the planned effort was reviewed with the Weyerhaeuser Hazardous Waste Engineer. Sampling was performed at pad T-12 on the 16th of February. Samples from pad T-12 and T-16 were obtained on the 17th of February.

Soil or ash sample homogenization was accomplished using decontaminated stainless steel spoons and mixing bowls. During the soil homogenization process debris, rocks and other materials larger than 0.25 inch were discarded.

Homogenized soil was then spooned into the sample jars. The jars were labeled immediately at the point of sampling and logged on the chain of custody record.

2.4 SAMPLING ACTIVITIES CONDUCTED BY WEYERHAEUSER

In addition to the testing activities conducted by HDR Engineering, Weyerhaeuser personnel obtained ash, surface soil, water and wipe samples for PCB analysis. Solid matrix and water samples were obtained as non-homogenized grabs and placed in sample containers similar to those used by HDR. The analytical laboratory and protocol were also the same as those used by HDR. The results of these sampling activities are used herein to supplement the database. Test results are included in Appendix C.

3.0 SITE INVESTIGATION RESULTS

Analytical results for the HDR sampling program are included in Appendix B. Table 3.1 is a summary of the results showing PCB concentrations at the ground surface and at depth. Subsurface samples without overlying (shallower samples) were obtained from stations located in the excavation surrounding the transformer pads.

3.1 SOLID SURFACES

Wipe samples on concrete and metal surfaces were obtained by both HDR and Weyerhaeuser personnel. Samples were obtained at three former transformer locations around the perimeter of the plywood plant site. Results for each location are discussed below.

3.1.1 TRANSFORMER PAD T-12

Weyerhaeuser representatives obtained wipe samples from transformer PAD T-12 before and after the surface (approx. 0.5 inch) of the 3-ft thick slab was removed using an air chisel. Results indicated initial and final concentrations of 720,000 and 14,000 ug/100 cm^2 (Appendix C). The final level of PCBs exceeds the allowable cleanup goal of 100 ug/100 cm^2. Alternatives for further measures for this pad are discussed in Section 4.0.

3.1.2. TRANSFORMER PAD T-17

Transformer pad T-17 was treated in a similar manner as pad T-12. After removal of the upper 0.5 inch of concrete, the pad was wipe-tested by Weyerhaeuser personnel and submitted for analysis. The final concentration was 29,000 ug/100 cm^2. This 6 ft x 6 ft x 3 ft-thick concrete slab requires additional cleanup or disposal measures as discussed in Section 4.0

3.1.3 TRANSFORMER PAD T-16

Three wipe samples were obtained by HDR Engineering on February 17, 1989. The transformer at this location was drained and removed for disposal. The pad was cleaned, but not air-chiseled prior to testing. Rain drip lines, iron staining from support bars, and the location of the secondary switchgear accurately showed the previous position of the unit. Two samples (16-01 and 16-02) were obtained from 10 cm x 10 cm square areas located immediately under the former locations of the front and rear cooling fin banks. The latter sample was positioned to be as close as possible to the former location of the

TABLE 3.1 SUMMARY OF PCB ANALYTICAL RESULTS FOR SOIL AND TESTING: TRANSFORMER PADS T12, T16 AND T17

MATRIX	STATION	PCB CONCENTRATION (ppm) AS AROCLOR 1260 AT SURFACE AND DEPTH INTERVALS (DETECTION LIMIT: 0.6 ppm) 0 FT	1 FT	2FT	2.5 FT
TRANSFORMER PAD T-12					
soil	12-01	150	----	----	----
soil	12-02	35	----	----	----
soil	12-03	99	9.0	4.9	----
soil	12-04	64	----	----	----
soil	12-05	--	----	----	----
soil	12-05A	2,500	----	----	----
soil	12-06	--	----	----	----
soil	12-06A	120	----	----	----
soil	12-07	12	----	----	----
soil	12-08	16	2,200	350	----
soil	12-09	--	----	84,000	----
soil	12-09A	--	----	7,300	----
soil	12-09B	--	----	16,000	----
soil	12-10	5.0	75	38	----
ash	12-11	<0.6	----	----	----
soil	12-12	23	1.8	4.1	----
ash	12-W8	48	----	----	----
soil	12-W10	2.1	----	----	----
TRANSFORMER PAD T-17					
soil	17-01	4.2	----	----	----
soil	17-02	6.4	----	----	----
soil	17-03	20	----	----	----
soil	17-04	--	----	1.1	----
soil	17-05	--	----	36	----
soil	17-5A	170	----	----	----
soil	17-06	--	----	310	----
soil	17-6A	160	----	----	----
soil	17-07	18	----	----	----
soil	17-08	22	1.6	1.6	----
soil	17-09	--	----	4.7	3,300
soil	17-9A	--	----	270	----
soil	17-10	3.9	0.7	<0.6	----
ash	17-11	0.8	----	----	----
ash	17-12	2.7	----	----	----
ash	17-W8	4.7	----	----	----
ash	17-W09	4.3	----	----	----
ash	17-W09A	170	----	----	----
TRANSFORMER PAD T-16 (WIPE TESTS ONLY)					
wipe	16-01	13 ug/100 sq cm			
wipe	16-01	10 ug/100 sq cm			
wipe	16-03	110 ug/100 sq cm			

transformer drain valve. The third wipe sample (16-03) was obtained from the interior of the rainwater sump located in the front of the curbed area, approximately 1 ft from the west end of the trench. Results for these three samples were 13, 10, and 110 ug PCB/100 cm^2 respectively. Of these, only the sump area exceeded the 100 ug/100 cm^2 limit defined under TSCA. Additional cleanup measures for the sump are recommended in Section 5.2

3.2 SOILS

The analytical laboratory test results for PCB levels were received from the Weyerhaeuser laboratory on March 1, 1989 (Appendix B) and indicated elevated levels of PCB contamination at some of the sampling stations at both transformer locations. Figures 3.1 and 3.2 show the results at each station. Figures 3.3 and 3.4 show the PCB concentration gradients (areal extent of contamination) estimated from the station data at transformer pads T-12 and T-17, respectively. As expected, elevated levels of PCBs in soils coincided with the area of suspected askarel release from the north (secondary terminal) sides of both devices. Samples were tested for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 (typical of transformer askarel dielectrics) was the predominant aroclor encountered.

3.2.1 TRANSFORMER PAD T-12

At Transformer pad T-12, the soil and the bottom of the excavated trench (2-ft deep - sample 12-09-SL-SS-02) contained 84,000 ppm PCB. This level decreased somewhat to adjacent (5-ft distant) stations 09A and 09B, where the bottom-of-trench PCB concentrations were 7,300 and 16,000 ppm, respectively. However, these levels of PCBs in soils still indicate direct contact concentrated released fluids. Elevated levels of PCB were also noted further to the west at station 08, which had concentrations of 2,200 and 350 ppm at the 1 and 2-ft levels. Station 5A also had a surface soil PCB concentration of 2,500. The remaining stations all exhibited PCB levels below 150 ppm, typical of secondary contamination in the immediate vicinity of a concentrated spill.

Stations having a PCB concentration between 25 and 150 ppm were 01, 02, 03 04, 5A and 6A. Samples obtained at depth at station 03 indicated PCB concentrations of 9.0 and 4.9 at the 1 and 2-ft levels.

Weyerhaeuser personnel obtained a soil sample in the vicinity of transformer pad T-12 (appendix C). Station

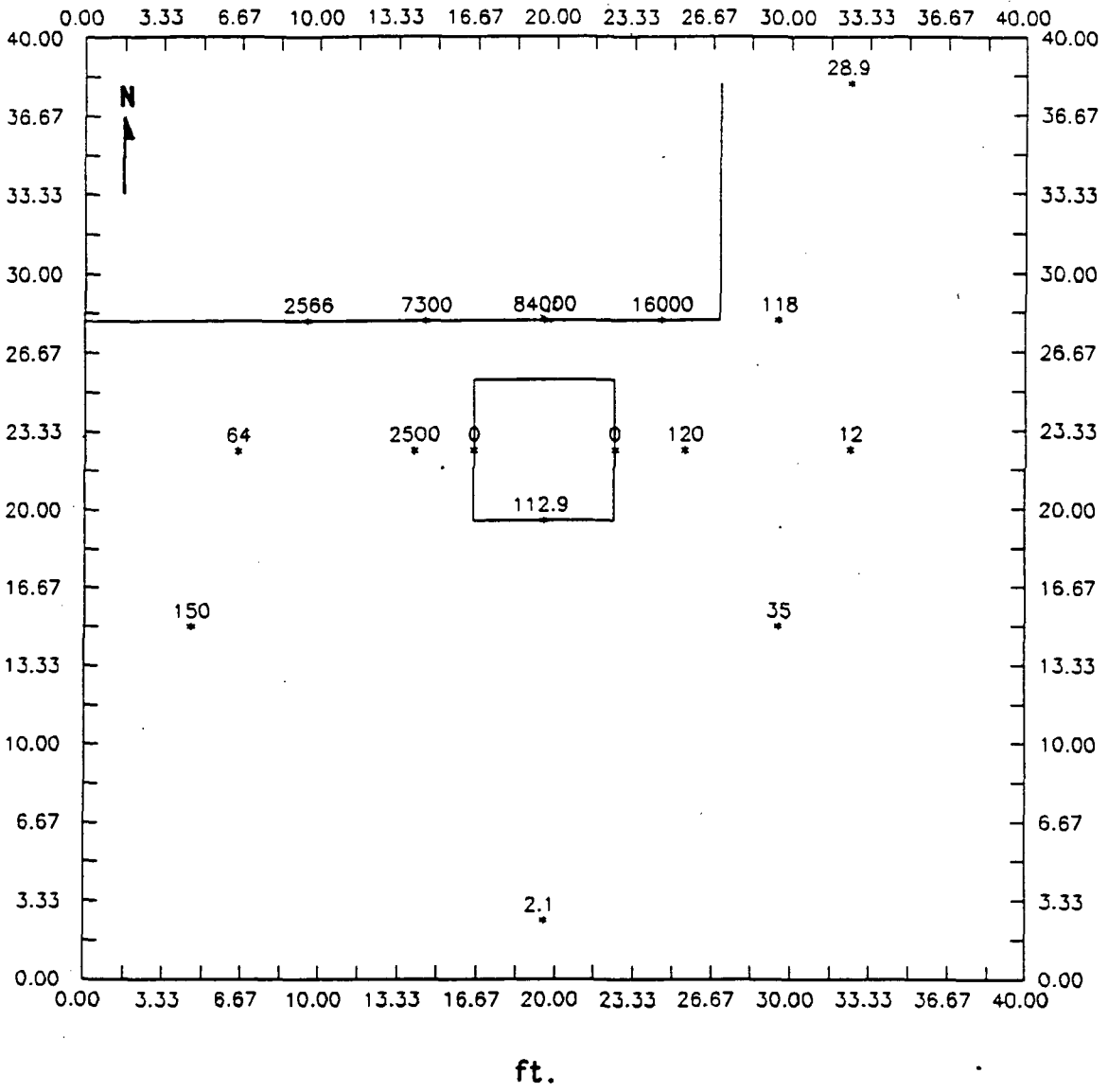


Figure 3.1 Transformer Pad T-12: PCB Concentrations at Sampling Stations (ppm)

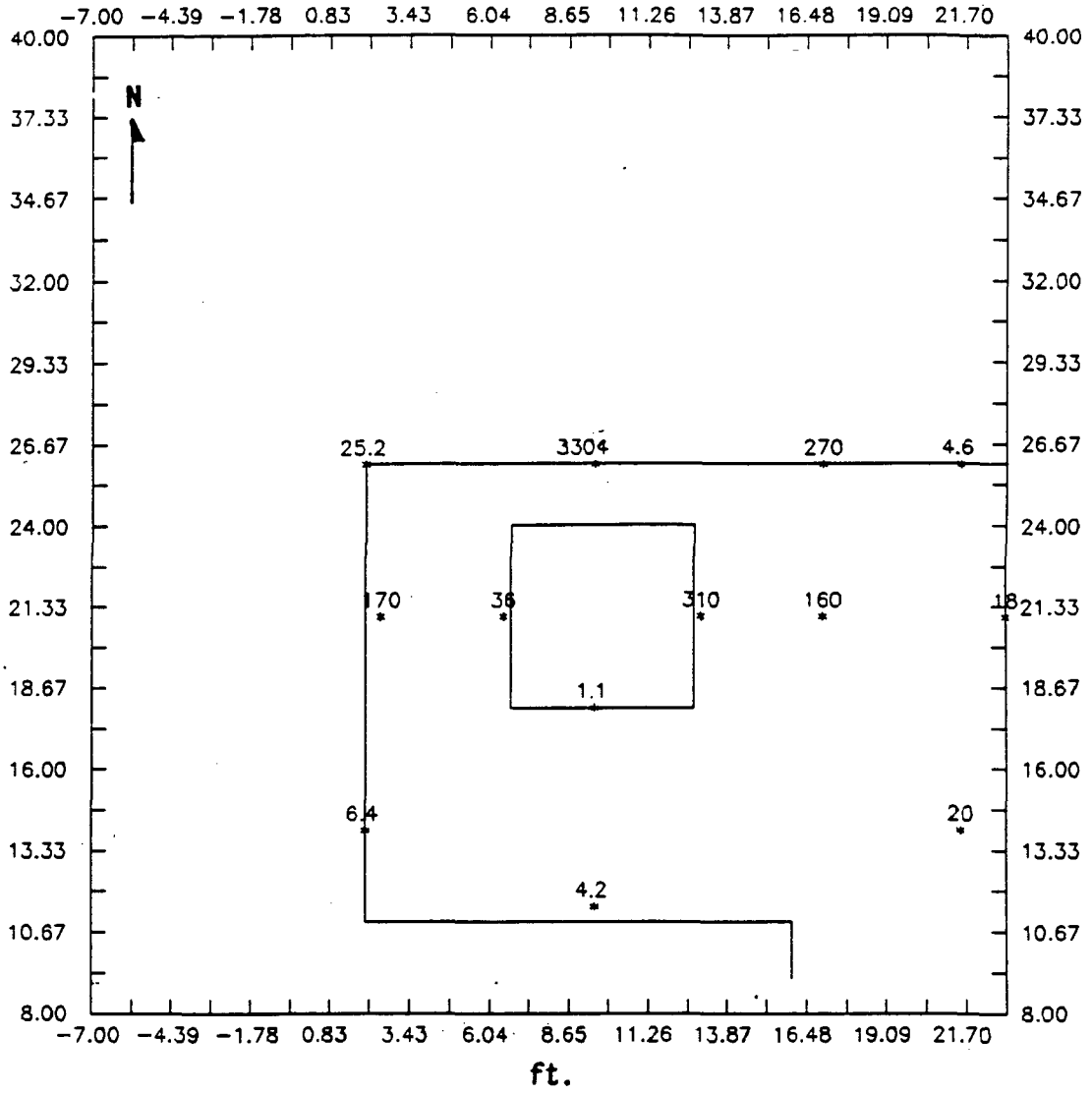


Figure 3.2 Transformer Pad T-17: PCB Concentrations at Sampling Stations (ppm)

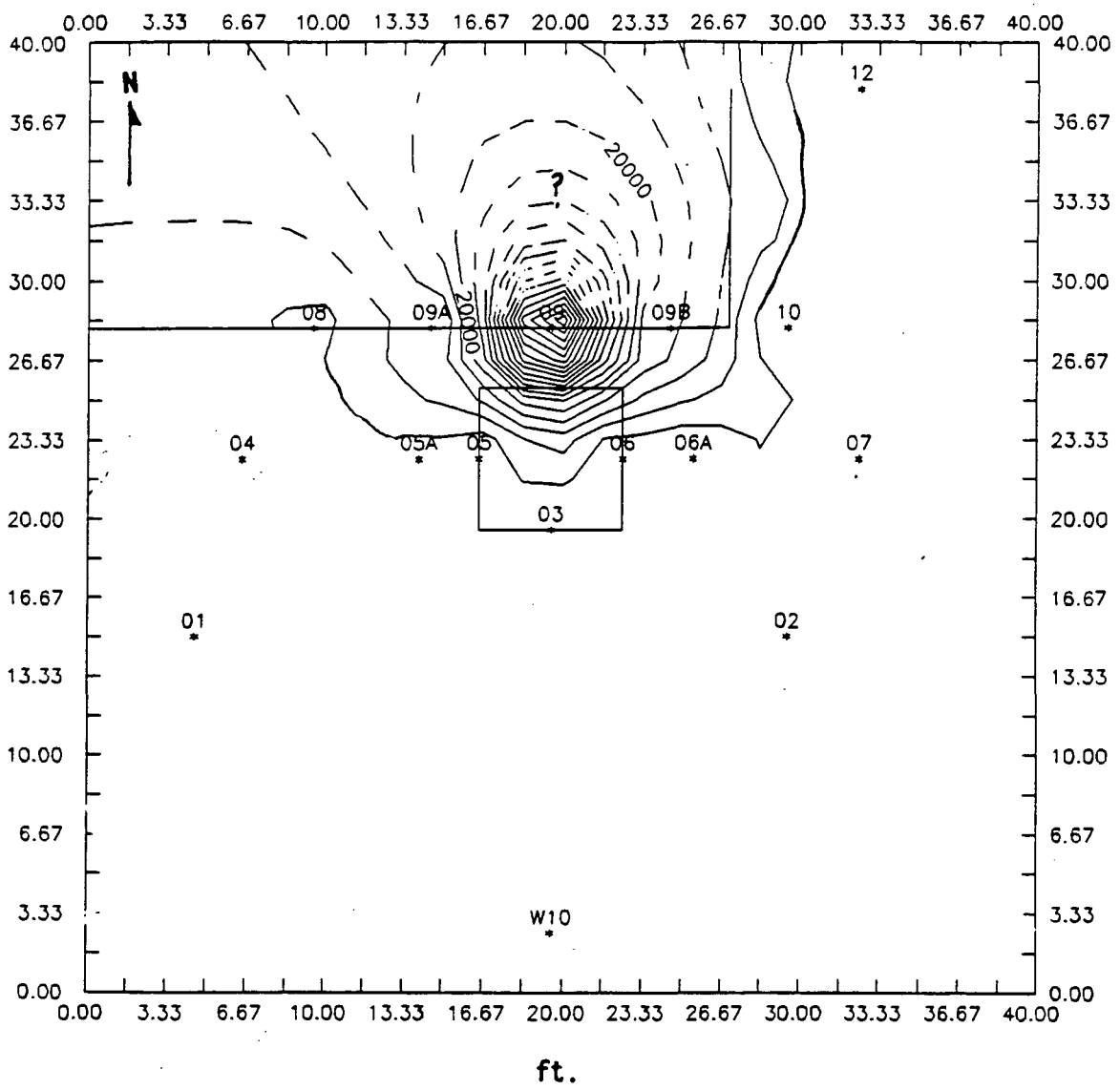


Figure 3.3 Transformer Pad T-12: Estimated PCB Concentration Gradients (summed over all sampling depths). Contour Interval: 4,000 ppm

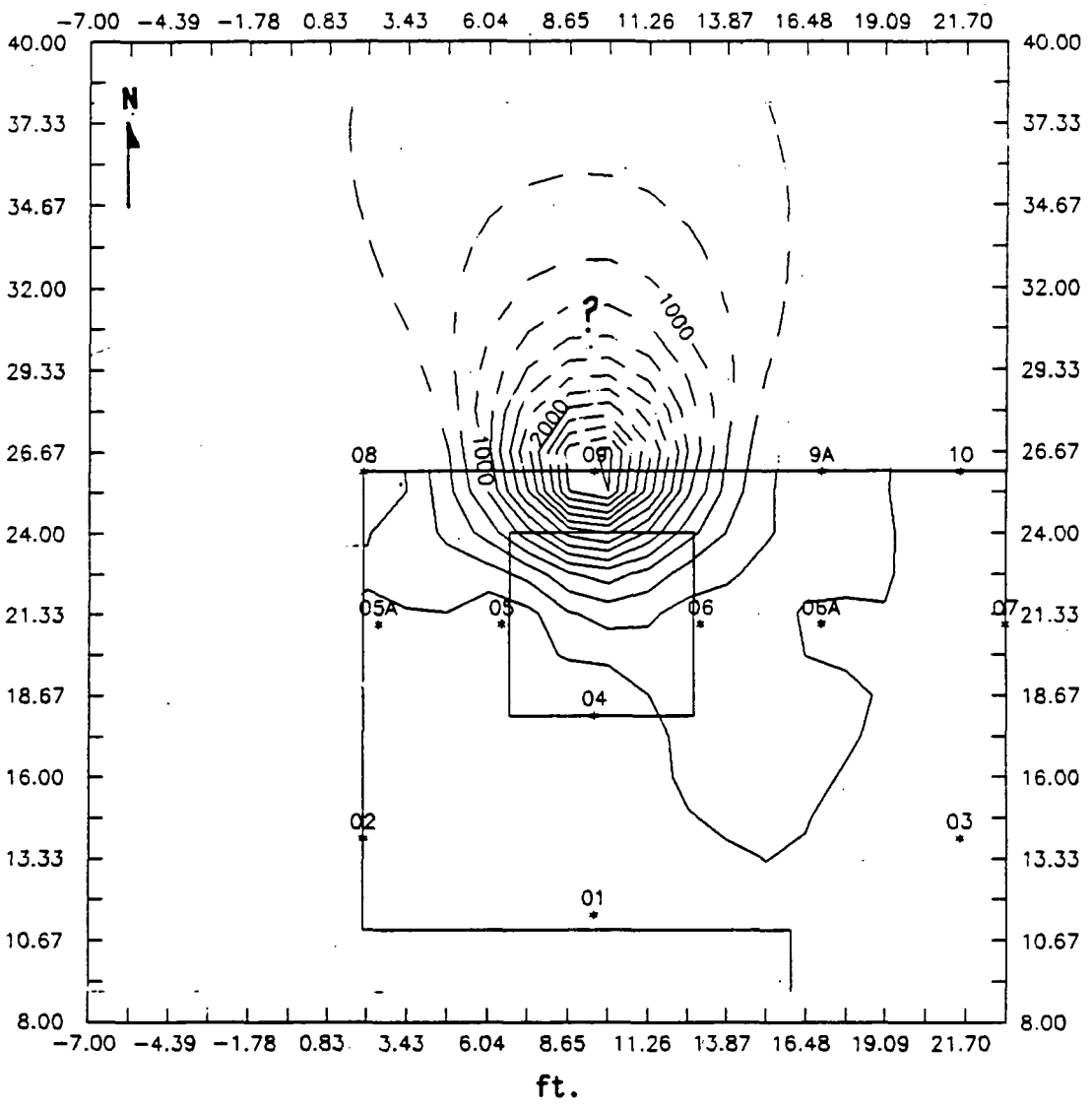


Figure 3.4 Transformer Pad T-17: Estimated PCB Concentration Gradients (summed over all sampling depths). Contour Interval: 200 ppm

number 10, located 17 ft south of the south side of the structural pad was found to contain 2.1 ppm PCB (service request no. 19013 - Appendix C). Samples obtained by Olympus Environmental (cleanup contractor) at stations 09, 09A and 09B contained 73,000, 32,000 and 10,000 ppm PCB, respectively (Appendix C - Service Request 19173. These results are comparable to those reported above.

3.2.2 TRANSFORMER PAD T-17

The levels of PCB contamination detected at transformer pad T-17 were lower than those encountered at T-12, yet still indicate the presence of spilled concentrated PCB fluids. The highest PCB level (3,300 ppm) was encountered immediately below the transformer secondary bushings (on the north side of the pad) at a depth of 2.5 ft below the original ground surface. A sample obtained immediately above at the 2 ft level (at the bottom of the trench) contained only 4.7 ppm PCBs. This overlying soil may have been dropped back into the trench during the removal of the transformer curbing.

Other sampling stations containing PCBs above 25 ppm were stations 5A, 6A 13 at the surface, and stations 05, 06, and 9A at the 2-ft depth level. All of the latter three samples were obtained at the bottom of the trench around the perimeter of the pad.

Samples obtained by Olympus Environmental (cleanup contractor) at stations 08, 09 and 09A contained 37, 2,400 and 270 ppm PCB, respectively (service request 19166 - Appendix C). These results are comparable to those reported above (25, 3,304 and 270 ppm) and further demonstrate the reproducibility of the soil testing activities.

3.3 ASH

Ash from the fire debris was sampled by HDR Engineering and submitted for PCB analysis. At transformer pad T-12, The ash from station 11 (located on the plant foundation ten feet north of soil sampling station 08 - Figure 3.1). contained less than 0.5 ppm PCB. Ash samples taken at pad T-17 from stations 11 and 12 and 14 (station 14 is a field split sample from station 12) also contained extremely low levels of PCBs: 0.8, 2.7 and 0.6 ppm, respectively.

Ash samples were also obtained by Weyerhaeuser personnel and tested for PCB content. Results for these samples are reported in Appendix C and summarized in Table 3.2 for Laboratory analysis request numbers 19013, 19039, and 10986.

TABLE 3.2 PCB CONCENTRATIONS IN ASH SAMPLES

ANALYSIS NUMBER	SAMPLE NUMBER	LOCATION	PCB CONC. (ppm)
[SAMPLES TAKEN PRIOR TO ANY CLEANUP (2/08/89)]			
10913	#1	T-12 - UNDER TRANSFORMER	550,000
10913	#5	NEAR BURNED CAPACITOR C-3	0.5
10913	#6	NEAR BURNED CAPACITOR C-3	0.5
10913	#7	T-17 - UNDER TRANSFORMER	340,000
10913	#8	15 FT WEST OF PAD T-17	4.7
10913	#9	15 FT NORTH OF PAD T-17	4.3
10913	#10	15 FT SOUTH OF PAD T-17	2.1
[SAMPLES TAKEN AT LOCATIONS IN BLDG (2/14/890]			
19039	A-1		1.6
19039	A-2		<0.1
19039	A-5		0.4
19039	A-8	T-12 ASH SOUTH OF SWITCHGR	48
19039	A-9	T-17 ASH SOUTH OF SWITCHGR	170
[SAMPLES TAKEN AT LOCATIONS IN BLDG (2/21/89)]			
19086	B-1	AREA 6 DEBRIS SITES	<0.6
19806	B-2	AREA 6 DEBRIS SITES	<0.6
19086	B-3	AREA 9 DEBRIS SITES	<0.6
19086	B-4	AREA 8 DEBRIS SITES	<0.6
19086	B-8	AREA 9 DEBRIS SITES	<0.6

Test results from the first round of testing indicate that ash materials immediately under the damaged bushings were soaked with leaked PCB fluids. These materials were subsequently cleaned up and disposed as PCB-contaminated solids. Ash outside the containment area, but immediately adjacent to the spill areas also showed elevated PCB levels of 48 and 170 ppm. These results indicate that additional wipe testing of foundations in this area may be warranted after ash cleanup (unless foundations are also removed and disposed as PCB-contaminated solids).

Results for all other stations indicate that spilled PCB fluids did not extend beyond the immediate vicinity of the localized releases at transformer pads T-12 and T-17.

3.4 GROUNDWATER

As indicated above, vertical penetration of spilled PCB fluids was evident at both transformer pad locations T-12 and T-17. At Transformer pad T-12, the highest concentration (8,400 ppm) was encountered at the 2-ft depth directly under the point of release and the next highest level (1,600 ppm) was at adjacent station 9B (5 ft to the east), also at the 2-ft depth. Similarly, at pad T-17, the highest PCB level was detected adjacent to the groundwater interface at the 2.5 ft depth, immediately below the point of leakage.

A water grab sample taken by Weyerhaeuser personnel (Appendix C - Service Request no. 19039) from the west side of pad T-12 showed a PCB level of 230 ppm. Oil-like sheens were observed on the surface of this water which was in direct contact with contaminated soil detected around the perimeter of the ditch. One grab sample of standing water in the excavated trench at pad T-17 (station 4) was obtained by HDR Engineering and submitted for PCB analysis. A concentration of 1.3 ppm PCB was detected. Olympus Environmental also obtained grab samples of water in the trench at pad T-12 and PCB concentrations were reported to be 770 and 1,310 ppm (Appendix C - Service Request 19173). These results indicate that PCB-contaminated soil in these areas is in contact with the shallow perched groundwater observed at or just below the 2-ft sampling depth. The variability in results may be due, in part, to the inclusion or exclusion of product sheens, silt, or globules at the top or bottom of the water column during sampling.

3.5 QUALITY ASSURANCE REVIEW OF PCB ANALYSES.

3.4.1 Shipping

Samples were delivered under chain-of-custody by the sampling team to Weyerhaeuser personnel on the same day they were obtained. Samples were kept cooled until analysis. The data package was received by HDR Engineering on March 15, 1989.

3.4.2 Analytical Method

Weyerhaeuser Analytical and Testing Services (Tacoma, Washington) used the U.S. EPA CLP cleanup method for medium-level soils to be tested for PCBs. The analytical method reference is EPA - 600/4/81/045 - September 1982.

3.4.3 Accuracy

Samples routinely analyzed for all aroclor matrix spikes during the same analytical period indicated a recovery ranging from 90 to 110 percent, with a mean of 100 percent.

3.4.4 Precision

To evaluate precision in the analysis of samples for PCB concentration, approximately 5 percent of the samples were collected in duplicate and analyzed "blind" by the laboratory. The following duplicate samples were obtained:

Matrix	Duplicate Samples	PCB Concentration (ppm)
Soil	17-6A-SL-S-0	160
	17-13-SL-S-0	280
Ash	17-12-AH-S-0	2.7
Ash	17-14-AH-S-0	0.6

Precision of the results are deemed acceptable under the analytical conditions and methods.

4.0 ESTIMATED EXTENT OF PCB CONTAMINATION

4.1 SOLID SURFACES

4.1.1 TRANSFORMER PAD T-12

Wipe test results presented in Section 3.1 indicate that the 6 ft x 6 ft structural concrete transformer pad at location T-12 is contaminated in excess of the allowable (TSCA) level of 100 ug/100 cm^2. The Wipe test indicated a PCB level of 14,000 ug/100 cm^2. Insufficient data exist to determine whether some or all of the slab surfaces exceed the cleanup standard and therefore the entire structure should be considered contaminated.

The concrete foundation north of transformer Pad T-12 is also likely to be contaminated above the allowable limit, although no wipe tests have been obtained to date from this area. Unlike PAD T-17, the joint between the secondary buswork duct and the transformer throat was positioned outside the containment curb at this location. Askarel released from the damaged bushings was free to drip down onto the south side of the concrete foundation under the secondary switchgear (formerly inside the building).

4.1.2 TRANSFORMER PAD T-17

Wipe test results presented in Section 3.1 indicate that the structural concrete pad at location T-17 is contaminated above the acceptable level. The residual contamination (29,000 ug/100 cm^2) indicates that spilled PCB fluids have extensively penetrated the porous matrix. Additional washing or chipping of the slab surfaces would be ineffective and would result in the generation of contaminated rinsates. Insufficient data exist to determine whether some or all of the slab surfaces exceed the cleanup standard and therefore the entire structure should be considered contaminated.

4.1.3 TRANSFORMER PAD T-16

Wipe tests indicate that transformer pad T-16 does not contain PCBs above the TSCA-established level of 100 ug/100 cm^2. However, one wipe test in the drainage collection sump at the front (north side) of the installation indicated a level of 110 ug/100 cm^2. This level can be easily reduced by surface cleaning.

4.2 SOIL AND GROUNDWATER

As mentioned above, the fate of the PCB fluids released from the two transformers was highly dependent on the positioning of the secondary bushing housing on the north sides of the units relative to the curbing immediately below. For transformer pad T-12, the fluids were able to flow outside the perimeter of the curb and onto the adjacent soils between the transformer installation and the plywood plant foundation. At transformer pad T-17, portions of the released fluid were retained inside the secondary containment area.

The precise amount of fluid released is unknown. The contractor that drained the fluids from the units after the incident reported that 385 and 440 gallons of fluid were drained from transformers T-12 and T-17, respectively (Olympus Environmental, Inc. 1989). The nameplate fluid volume listed for both units was 454 gal. Researchers (Dunlop 1986) report that approximately 12 percent of the dielectric fluid in a transformer remains in the porous core materials after draining. Hence, it can be estimated that a maximum of 23 gallons could have been released from transformer T-12. However, experience indicates that transformers seldom contain their nominal volumes. Usually, no more than 5 to 10 gallons are in place above the level of the bushings and it is most likely that this is the volumetric range for both liquid spills. This estimate does not take into account past (historical) releases of fluid that may have occurred.

4.2.1 AREAL EXTENT OF PCB CONTAMINATION

The areal extent of both fluid releases onto adjacent soils shown in Figures 3.3 and 3.4 is estimated to be approximately 100 and 35 square ft. for transformers T-12 and T-17, respectively. The extent to which contamination extended northward, either onto or underneath the former plywood plant foundations is currently unknown. It is likely that PCB contamination extends at least 2 or 3 ft northward, to the location of the secondary switchgear. Much of this was cleaned up when ash and debris in this area was deposited into drums. The extent of contamination beneath the foundations is difficult to estimate and may only be determined during further cleanup (see "Recommendations" - Section 5.0).

The areal extent of surface soil PCB contamination above 25 ppm was well defined by the sampling program at transformer pad T-17. Transformer pad T-12 included some outlying stations at elevated levels. Section 5.2 includes

recommendations for additional sampling prior to excavation to better determine the limits of required cleanup.

4.2.2 ESTIMATED DEPTH OF PCB CONTAMINATION

The results presented in Section 3.0 indicate that PCB contamination has extended beyond the 2-ft depth at both transformer pads T-12 and T-17 directly below the point of fluid release. However, the residual concentrations (less than 500 ppm) at transformer T-17 at stations other than 09 under the bushings indicate that concentrated fluid has not flowed much beyond this depth. Data indicate that the spill at transformer T-17 was limited in quantity and penetration.

The extent of penetration of fluid below the 2 ft depth at transformer T-12 requires further evaluation. Penetration into the saturated zone can be estimated based on several assumptions about the initial size of the spill, soil porosity, and other factors. A computer version of a model for evaluating the release of hydrophobic fluids onto soil surfaces (Metcalfe and Zukovs, 1986) was applied using the following assumptions:

- Worst case spill volume of 23 gal. (= 0.087 M^3)
- Askarel density = 1582 Kg/M^3
- Abs. Viscosity = 1.88×10^{-2} Pa.Sec.
- Soil permeability = 10^{-12} M^2
- Water table depth = 0.61 M
- Area of spill pool = 1 ft^2 (= 0.093 M^2)

A maximum spill penetration depth of 5.83 ft (1.78 M) was predicted by the model.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

The following conclusions can be drawn from the results of the PCB sampling program conducted in conjunction with Weyerhaeuser personnel:

- PCB contamination in excess of allowable levels for restricted access areas exist on concrete surfaces and in the soils at transformer Pad locations T-12 and T-17 (maximum PCB levels of 84,000 and 3,300 ppm, respectively). Transformer pad T-16 was found to be free of elevated levels of PCBs, except in the sump. One cleaning should reduce the sump contamination to acceptable levels. Spillage at transformer pad T-12 resulted in higher concentrations and larger area due to 1) positioning of the leaking secondary bushings relative to the containment curbing, and 2) the estimated amount of fluids released.

- PCBs were detected in ash materials encountered at the fire site, but only in the immediate vicinity of transformers T-12 and T-17. These wastes have been removed and handled as PCB-contaminated solids. Ash in the general fire area (outside of the transformer installations) does not require special handling under 40 CFR 761.

- The extent of PCB contamination below the groundwater surface and under the plant foundation is currently unknown. It is estimated that penetration of PCB liquids to a depth greater than 2 ft has occurred at both locations. Predictive modeling based on worst-case assumptions indicates that fluids may have penetrated as deep as 6 ft at location T-12 (assuming the absence of a confining layer of low permeability materials). Lateral transport of this plume (if any) is unknown.

5.2 RECOMMENDATIONS

Additional cleanup measures should be undertaken to remove residual PCB contamination at transformer pads T-12 and T-17 to levels that are in compliance with the TSCA PCB Spill Cleanup Standards. The concrete support pads should be removed, sealed for transport, and disposed in accordance with controlling regulations. The cleanup contractor is currently developing a cleanup plan for the transformer

sites which includes the following elements:

- o remove the structural pad
- o obtain additional samples of water from the pad depression
- o apply absorbent material to the water (if warranted by test results) to reduce free product
- o pump down the water (if warranted by test results and infiltration is not excessive) - filter pumped water using activated carbon (Appendix D includes information on small-scale carbon treatment canisters that are appropriate for this use) and contain/monitor the discharge.
- o excavate contaminated soil for disposal.

In order to avoid multiple mobilizations of excavation equipment, Weyerhaeuser should consider conducting fast-turn around testing of soils as the excavation is progressing. This can be achieved by 1) contracting with a mobile laboratory to provide on-site gas chromatographic screening analysis, or 2) pre-arranging with Weyerhaeuser's in-house or contract laboratories for rapid turn-around. Once adjacent soils are found to contain acceptable levels of PCBs, the excavation can be backfilled with clean soil.

Immediately prior to conducting additional work at transformer pad T-12, several additional surface soil samples should be obtained west of stations 04 and 08, south of station 04, and east of stations 10 and 12 for further delineate the zone of PCB contamination above 25 ppm.

Because of the involvement of groundwater in direct contact with concentrated PCB fluids, Weyerhaeuser should consider installation of several shallow groundwater monitoring wells in the immediate vicinity of both transformer locations. During installation of the wells, a geologist will be able to determine whether there are impermeable confining layers (i.e. clay) that are retarding downward migration of dense materials. If necessary, such a layer may be useful in limiting groundwater flow into or out of the contaminated soil mass during excavation. An assessment should also be performed to determine whether there are drinking water wells in the area. An outline work plan for this effort will be provided under separate cover.

Upon completion of cleanup at the two transformer sites,

Weyerhaeuser should prepare a final cleanup report addressing all items called for under 40 CFR, Section 761.125 - Records:

- Identification of the source of the spill, e.g., type of equipment
- Estimated or actual date and time of the s pill occurrence
- The date and time cleanup was completed.
- A brief description of the spill location and the nature of the materials contaminated. This information should also indicate that the spill occurred in a restricted access location
- Pre-cleanup sampling data (as presented in this report) used to establish the spill boundaries if required because of insufficient visible traces and a brief description of the sampling methodology used to establish the spill boundaries.
- Description of the surfaces cleaned [or removed]
- Approximate depth of soil excavation and the amount of soil removed
- Post-cleanup verification sampling data and, if not otherwise apparent from the documentation, a brief description of the sampling methodology and analytical technique used.

The report should also include data on groundwater quality (testing for PCBs and chlorinated benzenes) and actions (if warranted) to reduce contaminant levels in groundwater. This report should be retained in the Weyerhaeuser Company files as evidence of rapid and responsible action as called for by regulation.

6.0 REFERENCES

HDR Engineering, Inc. 1989. Sampling Plan - Weyerhaeuser's Cascade Division Snoqualmie Falls Plywood Plant Fire Site. February 1989.

Metclafe, Douglas E, and George Zukovs. 1986. A Rapid Assessment Model for Spills on Soil of Oily Fluids that are Immiscible with Water. Proceedings of the National Water Well Association's Conference on Petroleum Hydrocarbons and Organic Chemicals in Groundwater: Prevention, Detection and Restoration. 1986.

Olympus Environmental, Inc. 1989. Letter from Kelly Tjaden to Mick McCourt regarding Emergency Response - PCB Transformers and Debris - Weyerhaeuser Plywood Mill Site, Snoqualmie, Washington. February 16, 1989.

U.S. Environmental Protection Agency. 1985. Verification of PCB Spill Cleanup by Sampling and Analysis. U.S.EPA Office of Toxic Substances, Washington DC. August 1985.

U.S. Environmental Protection Agency. 1986. Field Manual For Grid Sampling of PCB Spill Sites to Verify Cleanup. U.S. EPA Office of Toxic Substances, Washington DC. May 1986.

APPENDICES

A. CHRONOLOGY OF EVENTS FOLLOWING THE FIRE INCIDENT

B. ANALYTICAL RESULTS FROM HDR PCB SAMPLING PROGRAM

C. WEYERHAEUSER PCB SAMPLING - SUPPLEMENTARY ANALYTICAL RESULTS.

D. SMALL-SCALE ACTIVATED CARBON TREATMENT CANISTERS: EXAMPLE PRODUCT LITERATURE

APPENDIX A

CHRONOLOGY OF EVENTS FOLLOWING THE FIRE INCIDENT

Interoffice Communication

Weyerhaeuser

Date February 24, 1989

From J. E. 'Mick' McCourt

Location WTC 2H4

Subject INCIDENT REPORT SUMMARY FOR SNOQUALMIE FALLS PLYWOOD PLANT FIRE

To R. Proctor - CH 1M31

On February 5, 1989 about 7:00pm, the first response to the Plywood Plant fire was made to turn off the power to the plant and notify the Snoqualmie Fire Department about 7:04pm. The site was evacuated except for emergency response personnel. The fire protection system failed due to extreme cold weather that had frozen up the system. In fact, the surface water supplies were frozen in close proximity to the plant and were also unavailable to the fire fighting actions. By 11:00pm the Plywood Building was declared a complete loss and allowed to burn out by the emergency response personnel. Winds were gentle to the North, away from most local households and city center of Snoqualmie.

By Monday afternoon, February 6, 1989, the Plywood Plant had cooled down enough to inspect the site. Two PCB transformers were found by L. Clark (shop operations) to have leaked an estimated one to ten gallons into their containment area (Transformers T-12 and T-17). It was later found that about one to five gallons was spilled from these transformers and that the transformers' temperature gauges' readings maximum were likely between 176 to 383°F. A third transformer, T-16, had not leaked and its temperature gauge reading maximum was 113°F. Mr. Clark notified R. Proctor, Weyerhaeuser's Regional Environmental Affairs Manager, of this condition which Mr. Proctor then reported to U.S. Environmental Protection Agency's National Response Center. Upon completing this notification, Mr. Proctor notified Mr. McCourt, Hazardous Waste/Materials Engineer, of the PCB spill event. Mr. McCourt began steps to identify qualified PCB cleanup contracts. Mr. Clark initiated efforts to remove overhanging debris site hazard associated with PCB transformers.

On February 7, 1989, a follow-up preliminary site investigation by L. Clark and J. McCourt discovered a suspected PCB capacitor (C-3) was burned in the fire near the Press Pit Area of the Plywood Plant. This site area was added to the PCB cleanup effort. Light ballasts were also noted in the fire debris, however, many of the light ballasts had nameplates that indicated non-PCB items.

Qualified PCB cleanup contractors were identified as well as overview sampling was conducted on February 7 and 8 1989. By February 9, 1989, General Electric Industry Sales and Service was selected to transport, cleanse and dispose of liquid PCBs, three transformer carcasses and suspected PCB capacitor. Olympus Environmental, Inc. was selected to decontaminate the PCB transformers and decontaminate the transformer pad and visual contaminated soils. HDR Engineering, Inc. was selected to do the site assessment work for the three initial phases of PCB cleanup. It is expected that additional PCB contaminated debris removal will be needed and that the completion of the PCB spill cleanup will be then certified.

The PCB cleanup emergency response was divided into four phases:

1. First Response: PCB transformers and suspect PCB capacitor removal completed on February 11, 1989, by GE and Olympus Environmental.

2. Second Response: Site assessment sampling and assessment work began February 8 through 16 with overview sampling. Grid sampling of PCB Transformers T-12, T-16, T-17 areas took place on February 16 and 20, 1989. HDR will be assessing the need for additional PCB debris removal or cleanup options before the certification of PCB spill cleanup.

3. Third Response: Additional PCB contaminated debris removal by Olympus Environmental and certification of PCB spill cleanup by HDR. This phase of the cleanup will depend on the findings of the site assessment.

4. Fourth Response: Identification and removal of other dangerous waste or hazardous material (HAZMAT). The findings to date suggest that chemical HAZMAT removal and asbestos HAZMAT removal will be necessary. A two step process will be used to remove these materials. The first step is removal of readily identifiable barrels, tanks and contaminated debris and asbestos sources. The second step will be the removal of roofing asbestos, contaminated ash and yet to be discovered HAZMAT chemicals.

Table 1 outlines the progress to date and schedules for remaining emergency response and HAZMAT removal actions.

It is anticipated that records and certification will be prepared to satisfy PCB regulations (40 CFR 761.125). Records and Certification Requirements include the following:

1. Identification of the source of the PCB spill which currently only includes Transformers T-12 and T-17.

2. Estimated or actual date and time of spill occurrence from February 5, 1989 7:00pm to February 11, 1989 with removal of both Transformers T-12 and T-17.

3. The date and time cleanup was completed or terminated. The first phase of PCB transformer and suspected PCB capacitor removal was completed on February 11, 1989. Subsequent Phases 2 and 3 of the Emergency Response are expected to be completed in the next few months or sooner.

4. A brief description of the spill location will be included in the HDR site assessment report.

5. Precleanup sampling data used to establish the spill boundaries, if required because of insufficient visible traces, and a brief description of sampling methodology used to establish the spill boundaries. First sampling to overview the site included sampling of the containment spill debris, 15 feet from the containment areas, general Plywood ash and asbestos sampling, and liquid wastes. Suspected PCB capacitor sampling was also initiated with PCB, dioxins and furans under the capacitor, C-3, and 15 feet west of the capacitor. Second sampling phases will include grid sampling of Transformers T-12 and T-17 and

wipe sampling of transformer pad areas. A third sampling phase using 6 to 12 point area composite ash sample was taken to profile the plywood plant ash debris as a nondangerous, potentially asbestos-contaminated waste.

6. A brief description of the solid surfaces cleaned and of the double wash/rinse method used. The contaminated surface was initially removed by chipping away the contaminated containment area and pad to reduce the penetration of PCB into the two- to three-foot-thick transformer pad.

7. Approximate depth of soil excavation and amount of soil removed was initially two to three feet under the containment perimeter.

8. A certification statement signed by the responsible party stating that the cleanup requirements have been met and that the information contained in the record is true to the best of our knowledge.

These requirements are anticipated to be part of the site assessment scheduled to be completed by HDR in the next few months or sooner.

Additional PCB cleanup reports and technical memorandum will follow to keep you informed on the PCB spill cleanup for Snoqualmie Falls Plywood Plant transformers and capacitor.

Mick McCourt

J. E. 'Mick' McCourt

esw/c10/0222

cc: J. Traylor - Springfield 85
L. Clark - Snoqualmie 81
V. Moore - Snoqualmie 81
D. Sjolseth - WTC 2H2
C. Carlson - WTC 1D2

Table 1
Chronology of Snoqualmie Falls Plywood Plant
Fire, PCB Cleanup and HAZMAT Emergency Response
February 5 to 16, 1989

2-5-89	Fire event and initial emergency response.
2-6-89	Discovery of PCB spill noted at Transformers T-12 and T-17. Notification made to National Response Center of PCB spill. PCB spillage appears to be contained by concrete floor and curbs at Transformers T-12 and T-17 and is estimated at one to five gallons per transformer.
2-7-89	Identification of PCB cleanup contractors and preliminary sampling site location survey. Suspected PCB capacitor, C-3, observed inside plant. Initial debris removal began to allow access to sites.
2-8-89	First series of soil and ash samples taken in or near Transformers T-12 and T-17 and Capacitor C-3 to overview PCB, dioxins and furans and dangerous waste criteria. Level C personnel protection gear used to obtain samples.
2-9-89	PCB cleanup contractors selected. Asbestos sampling initiated on site. Work plans submitted for PCB transformer removal effort including health and safety and sampling plans for PCB transformers.
2-10-89	Olympus Environmental initiates PCB transformer draining and pad cleanup at Transformer T-16, non leaking PCB transformer and T-12 and T-17.
2-11-89	GE removes drained and cleaned PCB transformers to their Portland TSDF. Manifested PCB items include three transformers, about 25,000 lbs; 19 drums of PCB liquid, about 12,550 lbs; seven drums of PCB contaminated cleanup debris, about 3,150 lbs; and one drum of suspected PCB capacitor, about 12 lbs.
2-12 to 16-89	PCB transformer pad and PCB contaminated soil removal continues. Contaminated debris placed in salvage drums and stored temporarily in Hazardous Waste/PCB Storage Area. Additional asbestos sampling takes place.
2-12 to 14-89	PCB, dioxin and furan wipe samples taken to certify the PCB transformer pads and suspected PCB capacitor debris cleaned to 40 CFR 761 requirements.
2-13-89	Second series of soil, hydraulic oil, water and ash sampies taken to clarify and overview PCB contamination and dangerous waste issues.

2-14-89	Work plans for HAZMAT chemical removal submitted for general drums, tanks and chemical contaminated debris by Olympus Environmental.
2-15-89	Work plans submitted for five specific high concentration asbestos sites 23-1, 23-2, 23-3, 23-4 and 23-5 by Enviro-Comply. Press pit water sampled for PCB, BNA's and total metals scan.
2-16-89	PCB site assessment work began by HDR Engineering, Inc. according to submitted sampling and health and safety plans on Transformer Pad T-12. Chemical and asbestos HAZMAT removal is in progress.
2-21-89	Asbestos abatement work completed on with five areas. Third round of overview sampling of ash initiated to characterize waste for disposal at Cedar Hills landfill.
-	HAZMAT asbestos cleanup certification, HAZMAT drum consolidation and completion of HDR PCB cleanup site assessment sampling 2/22/89.
-	Gross asbestos contaminated ash removal, asbestos abatement and demolition to certify plywood plant cleared of HAZMAT chemical and asbesto hazards by 2/27/89 or sooner.
-	Complete HAZMAT chemical and asbestos abatement work by 3/17/89.
-	PCB cleanup site assessment reports by 4/1/89 or sooner.
-	Complete demolition of plywood plant to grade by 5/15/89.

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE CLEANUP SOIL/WATER/WIPES

Aroclor Analysis

Twenty two soils, three wipes and two waters were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soils and 0.06 ppm in the water.

	Amount in PPM (ug/g)
17-5A-SL-S-0	170
17-05-SL-SS-2	36
17-6A-SL-S-0	160
17-04-SL-SS-02	1.1
17-07-SL-S-0	18
17-13-SL-S-0	280
17-02-SL-S-0	6.4
17-03-SL-S-0	20
17-01-SL-S-0	4.2
17-06-SL-SS-02	310
17-12-AH-S-0	2.7
17-14-AH-S-0	0.6
17-9A-SL-SS-2	270
17-08-SL-S-0	22
17-10-SL-S-0	3.9
17-11-AH-S-0	0.8
17-09-SL-SS-2.5	3300
17-09-SL-SS-2	4.7
17-10-SL-SS-2	<0.6
17-08-SL-SS-2	1.6
17-10-SL-SS-1	0.7
17-08-SL-SS-1	1.6
16-01-WP-S-0	13 ug in wipe
16-02-WP-S-0	10 ug in wipe
16-03-WP-S-0	110 ug in wipe
17-00-WA-B-0	<0.06
17-04-WA-SS-2	1.3

Approved [signature] Date 3/10/89 Notebook _____

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Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE FALLS PCB SURVEY/CLEANUP PROJECT

Aroclor Analysis

Twenty two soils and one water were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soils and 0.06 ppm in the water.

	Amount in PPM (ug/g)
12-08-SL-SS-2	350
12-9B-SL-SS-2	16000
12-09-SL-SS-2	84000
12-08-SL-SS-1	2200
12-9A-SL-SS-2	7300
12-02-SL-S-0	35
12-01-SL-S-0	150
12-07-SL-S-0	12
12-04-SL-S-0	64
12-12-SL-S-0	23
12-6A-SL-S	120
12-10-SL-SS-2	38
12-10-SL-SS-2	75
12-08-SL-S-0	16
12-11-AH-S-0	0.5
12-10-SL-S-0	5.0
12-03-SL-SS-1	9.0
12-12-SL-SS-1	1.8
12-5A-SL-S-0	2500
12-03-SL-S-0	99
12-12-SL-SS-1.5	4.1
12-03-SL-SS-2	4.9
12-00-WA-B-0	1.1

Approved [signature] Date 3/6/89 Notebook_____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE SOIL/ASH SAMPLES

Aroclor Analysis

Three soil samples and one EPA reference transformer oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Aroclor 1260 was detected in all the samples with the results summerized below.

The recovery of the EPA reference sample was 94%.

T-17	Soil	3/8/89 @3:30pm	23000 ppm
T-17W	Soil	3/8/89 @3:30pm	37 ppm
T-17E	Soil	3/8/89 @3:30pm	270 ppm

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Tacoma, Washington 98477

Report

SNOQUALMIE CLEANUP OIL

Aroclor Analysis

One oil sample (A-14 oil switch) was analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 at the quantitation limit of 0.1 ppm (ug/Kg). Aroclor 1260 was found at the level of 4.1 ppm.

An EPA reference transformer oil was also analyzed in duplicate. The recovery was 102% and 106%. The level of the reference was 18 ppm.

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APPENDIX C

WEYERHAEUSER PCB SAMPLING SUPPLEMENTARY ANALYTICAL RESULTS

Tacoma, Washington

CHAIN OF CUSTODY RECORD

PROJECT NUMBER	TASK	Samplers (signatures)
1 1 T 1 1 1	1	J. E. McCourt

Sample Designation	Lab Code	Collection Time	Collection Date	Analyses Required
★ #1 T-12 Under XFMR	2 —	4:58 PM	2-8-89	PCB
sent to I.T. 2-9-89 cc #2 C3 Snoe Falls		5:13 PM	2-8-89	Dioxins & Furans
#3 C3 Snoe Falls		5:13 PM	2-8-89	Dioxins & Furans
#4 C3 - 15ft W.		5:40 pm	2-8-89	Dioxins & Furans
★ #5 Surface Sample same as 2 & 3		5:45 PM	2-8-89	PCB
★ #6 Surface Sample same as 4		5:50 PM	2-8-89	PCB, Fish Bioassay
★ #7 Under Bridge of T-17		6:50 PM	2-8-89	PCB
JCM #8 15ft W. of T-17		6:03 pm	2-8-89	PCB, Fish Bioassay
#9 15ft N of T-17		6:05 pm	2-8-89	PCB, Fish Bioassay,
#10 15ft S of T-12		6:10 pm	2-8-89	PCB, Fish Bioassay, E

Method of Shipment Personal Vehicle

Dispatched by: (signature)	Time	Date	Received for Laboratory by: (signature)	Time	Date
J. E McCourt	8:00	2-8-89	Cathryn Conroy	9:28 am	2-9-

Comments Held in Mr. McCourt's custody / stored @ WTC unless

Relinquished by: (signature)	Received by: (signature)	Time	Date
Comments			
Comments			
Comments			
Comments			

RECORD BOOK
PAGE NUMBER

Weyerhaeuser Research and Development - Analysis and Testing | Request Number: 19013

Title: (7) SNOQUALMIE FALLS SOIL SAMPLES FOR PCB'S

Number of Samples: 7	Project Number: 046-5601	Groups: 1,3
Date Received: 02/09/89	Date Desired: 02/10/89	Estimated Completion Date:
Submitted By: MCCOURT, J.E.	Location: WTC 2H4	Telephone: 6513
Reviewed By: CATALANO, Dennis	Location: 2F 25	Telephone: 924-6242
Copy To:		

Sample Description and History:

PCB'S ON ALL; IF ENOUGH SAMPLE, BIOASSAY, THEN EPTOX-METALS IN THAT ORDER ON SPECIFIC SAMPLES. ***PLEASE TAKE MINIMUM AMOUNT OF SAMPLE BECAUSE DIOXIN ANALYSIS MAY BE REQUESTED LATER.***

Series	Test Code - Report Range - Test Description
Groups	Report Basis - Lower Limit of Sensitivity

1	A PCB-S	- -	PCB - Solid
0	B BIOASSAY	- -	Bioassay - Fish Lab
3	C EPT-EM	- -	EP Toxicity (Extraction and metals)

Sample Number	Series to Be Evaluated	Submitter's Designation
24392	A	#1 T-12 UNDER XFMR 2/8/89 @ 4:58 PM
24393	A	#5 SURFACE SAMPLE 2/8/89 @ 5:45 PM
24394	ABC	#6 SURFACE SAMPLE 2/8/89 @ 5:50 PM
24395	A	#7 UNDER BASE OF T-17 2/8/89 @ 6:00 PM
24396	ABC	#8 15 FT. E. OF T-17 2/8/89 @ 6:03 PM
24397	ABC	#9 15 FT. N. OF T-17 2/8/89 @ 6:05 PM
24398	ABC	#10 15 FT. S. OF T-12 2/8/89 @ 6:10 PM

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved:		Date: 2-16-89	Signature applies to attached pages		Page Number:

Printed on: 02/09/89 Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE FALLS SOIL SAMPLES FOR PCB's

Aroclor Analysis

Seven oil in soil samples and an EPA trasformer reference oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260 by EPA CLP medium level soil analysis. All samples contained Aroclor 1260, with the results summerized bellow.

#1 T-12 Under Transformer	2-8-89 @4:58 pm	55%
#5 Surface Sample	2-8-89 @5:45 pm	0.5 ppm
#6 Surface Sample	2-8-89 @5:50 pm	0.5 ppm
#7 Under Base of Transformer	2-8-89 @6:00 pm	34%
#8 15 ft East of Transformer	2-8-89 @6:03 pm	4.7 ppm
#9 15 ft North of Transformer	2-8-89 @6:05 pm	4.3 ppm
#10 15 ft South of Transformer	2-8-89 @6:10 pm	2.1 ppm

The EPA reference was analyzed at 11.4 ppm. The recovery was 103%.

Approved _____ Date 2/13/89 Notebook_____

Page Number _____

ANALYTICAL LABORATORY SERVICES REQUEST

Weyerhaeuser Research and Development - Analysis and Testing

Request Number: 19039

Sample Number	Series to Be Evaluated	Submitter's Designation
24466	ABCD	A-1 COMPOSITE ASH
24467	ABCD	A-2 COMPOSITE ASH
24468	A C E	A-3 HYDRAULIC OIL *METALS - CR,CD,AS,PB
24469	ABCD	A-4 GLUE AREA SURFACE SAMPLE
24470	ABCD	A-5 ASH COMPOSITE
24471	ABCD	A-6 GLUE WASTE
24472	A F	A-7 WATER FROM T-12 WESTSIDE SLAB
24473	A	A-8 T-12 BASE ASH SAMPLE NEAR SWITCH GEAR
24474	A	A-9 T-17 BASE ASH SAMPLE NEAR SWITCH GEAR
24475	A	SNOQUALMIE CAPACITOR WIPE

ANALYTICAL LABORATORY SERVICES REQUEST

Weyerhaeuser Research and Development - Analysis and Testing

KMPH

Request Number: 19039

Title: (10) SNOQUALMIE ASH/WASTE/OIL/WATER SAMPLES

Number of Samples: 10	Project Number: 046-5601	Groups: 1,3,4,FISH LAB
Date Received: 02/14/89	Date Desired: 02/16/89	Estimated Completion Date:
Submitted By: MCCOURT, J.E.	Location: WTC 2H4	Telephone: 6513
Reviewed By: CATALANO, Dennis	Location: 2F 25	Telephone: 924-6242
Copy To:		

Sample Description and History:

CLP METALS TO INCLUDE HG, AS. PLEASE NOTE PCB'S WERE CODED AS PCB-S, HOWEVER, SAMPLE A-3 IS AN OIL, A-7 IS A WATER. THE CAPACITOR WIPE HAS BEEN SPLIT OUT TO I.T. FOR DIOXIN & FURAN ANALYSIS.

Series / Groups	Test Code - Report Range - Test Description / Report Basis - Lower Limit of Sensitivity
A 1	PCB-S - - PCB - Solid
B 0	BIOASSAY - - Bioassay - Fish Lab
C 3	CLPMET-S - - Metals - CLP in Soil or Sludge
D 3	CORR/3 - - Corrosivity
E 4	TX - OIL - -
E 4	IGNIT - - Ignitability - flash point
F 1	BNA-WW - - Base Neutral Acid - Water (625)

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved:		Date: 2-16-89	Signature applies to attached pages		Page Number:

Printed on: 02/14/89

Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE ASH/WASTE/OIL/WATER SAMPELS

Aroclor Analysis

Eight soil/waste, one wipe, one water sample and an EPA transformer reference oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260 by EPA CLP medium level soil analysis. Aroclor 1260 was detected in some of the samples, with results summerized bellow.

Amount is in PPM (except capacitor wipe)

A-1 COMPOSITE ASH	1.6
A-2 COMPOSITE ASH	<0.1*
A-3 HYDRAULIC OIL	<0.1
A-4 GLUE AREA SURFACE SAMPLE	<0.1
A-5 ASH COMPOSITE	0.35
A-6 GLUE WASTE	<0.1
A-7 WATER FROM T-12 WESTSIDE SLAB	230
A-8 T-12 BASE ASH SAMPLE NEAR SWITCH GEAR	48
A-9 T-17 BASE ASH SAMPLE NEAR SWITCH GEAR	170
SNOQUALMIE CAPACITOR WIPE	0.3 ug/sample

*indicates Aroclor 1260 was detected below the quantitation limit

The capacitor wipe indicates that some Aroclor 1260 was detected but cannot be quantitated (the wipe is not a quantitative amount).

The water sample was cloudy with a small amount of an oily substance present - some appeared to be heavier than water.

The EPA reference transformer oil (WP 380 Concentrate #3) gave a recovery of 103% at a level of 18 PPM of Aroclor 1260.

Approved _____ Date 2/16/89 Notebook_____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE PRESS PIT WATER

Aroclor Analysis

One water sample (PRESS WATER PIT 2-15-89 @2 PM) was analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254, and 1260. No Aroclors were detected at or below the following quantitation limits:

Aroclor 1221	1.0 PPM
Aroclor 1016	0.1 PPM
Aroclor 1232	0.1 PPM
Aroclor 1242	0.1 PPM
Aroclor 1248	0.1 PPM
Aroclor 1254	0.1 PPM
Aroclor 1260	0.1 PPM

Approved [signature] Date 2/17/89 Notebook _____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE FIRE CLEANUP PROJECT WATER AND SOIL

Aroclor Analysis

One soil sample and one water sample were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the soil and 0.06 ppm in the water.

Amount in PPM (ug/g)

A-12 SOIL FROM NEAR NULOC	<0.6
A-13 SITE 6 PLYWOOD BLDG RUNOFF	<0.06

Approved _____ Date 2/27/89 Notebook_____

Page Number _____

Weyerhaeuser Research and Development - Analysis and Testing | Request Number: 19086

Title: (5) SNOQUALMIE CLEANUP ASH

Number of Samples: 5	Project Number: 046-5601	Groups: 1,3 FISH LAB
Date Received: 02/22/89	Date Desired: 02/24/89	Estimated Completion Date:
Submitted By: MCCOURT, MICK	Location: WTC 2H4	Telephone: 6513
Reviewed By: CHRISTIAN, Jeff	Location: 2F 25	Telephone: 924-6013
Copy To:		

Sample Description and History:

BULK DEN= BULK DENSITY

Series	Test Code - Report Range - Test Description
Groups	Report Basis - Lower Limit of Sensitivity

A 3	EPT-EM	- -	- EP Toxicity (Extraction and metals)
A 3	CORR/3	- -	- Corrosivity
A 3	SOLIDS/3	- -	- Solids
A 3	BULK DEN	- -	-
B 1	PCB-S	- -	- PCB - Solid
C	BIOASSAY	- -	- Bioassay - Fish Lab

Sample Number	Series to Be Evaluated	Submitter's Designation
24757	ABC	B-1 AREA 6 SITES 7/8 2/21 10:00AM
24758	ABC	B-2 AREA 6 SITES 9/10 2/21 10:09AM
24759	ABC	B-3 AREA 9 SITE 36 2/21 10:50AM
24760	ABC	B-4 AREA 8 SITES 37/38/40 2/21 10:22AM
24761	ABC	B-8 AREA 9 SITES 31/33/35 2/21 11:00AM

Interim Report Desired?	Hazardous Samples? Yes		No		
Reference:					Record Book:
Results Approved: Jeff Christian	Date: 2-28-89	Signature applies to attached pages			Page Number:

Printed on: 02/22/89

Page: 01

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Report

SNOQUALMIE CLEANUP ASH

Aroclor Analysis

Five ash/water samples were analyzed for Aroclor 1221, 1016, 1232, 1242, 1248, 1254, and 1260. Aroclor 1260 was found in the samples with the following results. The quantitation limit was 0.6 ppm in the ash.

Amount in PPM (ug/g)

B-1 AREA 6 SITES 7/8 2/21 10:00 AM	<0.6
B-2 AREA 6 SITES 9/10 2/21 10:09 AM	<0.6
B-3 AREA 9 SITES 36 2/21 10:50 AM	<0.6
B-4 AREA 8 SITES 37/38/30 2/21 10:22 AM	<0.6
B-5 AREA 9 SITES 31/33/35 2/21 11:00 AM	<0.6

Approved _____ Date 2/22/89 Notebook_____

Page Number _____

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

5815 Middlebrook Pike • Knoxville, Tennessee 37921 • 615-588-6401

CERTIFICATE OF ANALYSIS

TO: Weyerhaeuser Analytical Chemistry
ATTN: Dennis Catalano
32901 Weyerhaeuser Way South, WTC 2F25
Federal Way, WA 98003

DATE REPORTED: February 21, 1989
PROJECT CODE: WEY 42825
ORDER NUMBER:

Sample Description: Five (5) extracts received February 17, 1989

Concentration units are total µg

	Aroclor 1016, 1232 1242† and/or 1248	Aroclor 1254	Aroclor 1260	Total Aroclors
BB1109,T-12 Slab Wipe	<12,000	<26,000	720,000	720,000
BB1110, Wipe Throat	<18,000	<25,000	1,500,000	1,500,000
BB1111,T-17 Clean	<360	<500	29,000	29,000
BB1112,T-12 Clean	<180	<250	14,000	14,000
Blk 1337, Reagent Blank	<10	<10	<10	<10

†Sample Aroclor pattern identified and/or calculated as Aroclor 1242.

Approved by: Alyce L. Moore
Laboratory Manager

Title

Accredited by the American Association for Laboratory Accreditation in the chemical

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Recd by HDR
3/22/89

Report

SNOQUALMIE SOIL/ASH SAMPLES

Aroclor Analysis

Three soil samples and one EPA reference transformer oil were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Aroclor 1260 was detected in all the samples with the results summerized below.

The recovery of the EPA reference sample was 94%.

The soil T-17 gave a result much higher than expected from previous data (23000 compared to 3300). It was reextracted and upon reanalysis, gave a result comparable to the previous data. Because of the recovery of the internal standard on the high analysis (114%), the cause of the high value must be attributed to lack sample homogeniety

T-17	Soil	3/8/89 @3:30pm	2400 ppm
T-17W	Soil	3/8/89 @3:30pm	37 ppm
T-17E	Soil	3/8/89 @3:30pm	270 ppm

Approved Michael Grace Date 3/13/89 Notebook _____

Page Number _____

Weyerhaeuser
Analytical and Testing Services
Tacoma, Washington 98477

Recd by HDR.
3/22/89

Report

SNOQUALMIE SOIL SAMPLES

Aroclor Analysis

Three soil samples were analyzed for Aroclors 1221, 1016, 1232, 1242, 1248, 1254 and 1260 with a quantitation limit of 0.6ppm. Two of the samples contained a layer of water and that was analyzed also. Aroclor 1260 was detected in all the samples with the results summerized below.

T-12	Soil	3/9/89 @12:05pm	73000 ppm
T-12	Water		1310 ppm
T-12E	Soil	3/9/89 @12:05pm	10000 ppm
T-12W	Soil	3/9/89 @12:05pm	32000 ppm
T-12W	Water		770 ppm

Approved [signature] Date 3/13/89 Notebook_____

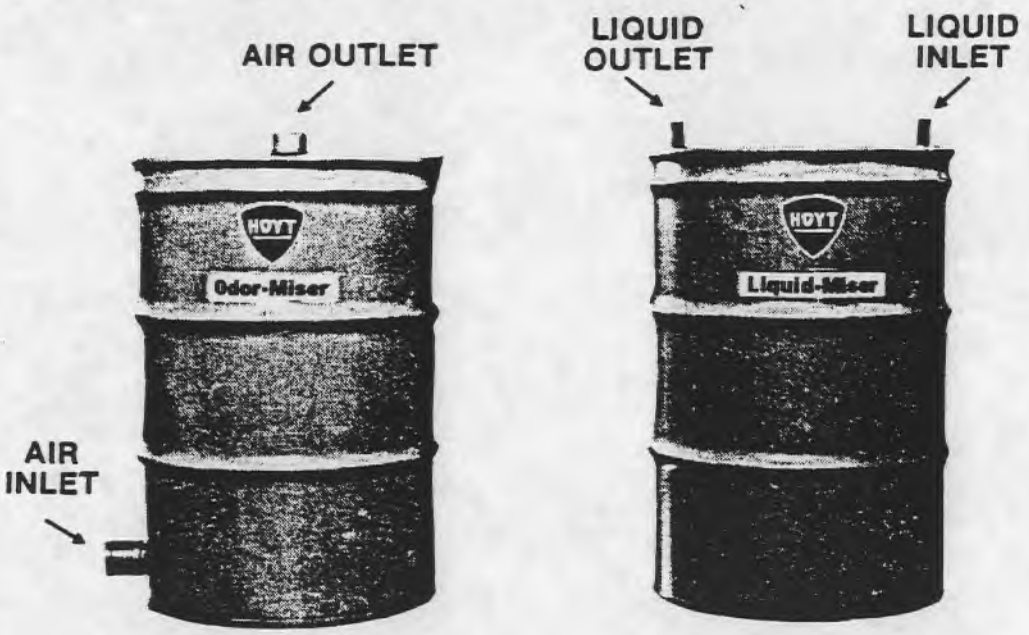
Page Number _____

APPENDIX D

SMALL-SCALE ACTIVATED CARBON TREATMENT CANISTERS: EXAMPLE PRODUCT LITERATURE

HOYT

Activated Carbon Canisters



The Hoyt Odor-Miser and Liquid-Miser are pre-engineered, low-cost, activated carbon canisters designed to provide an effective solution for purifying low flow rate air and water streams without the need for capital investment, dedicated personnel or complicated process equipment.

Hoyt Carbon Canisters are on the job 24 hours per day to clean up air emissions and water streams. Depending on flow rates, additional units can be installed in series or parallel.

The life of an Odor-Miser or Liquid-Miser will depend on the type, concentration and volume of contaminant in the air or water stream. In certain cases, these carbon canisters have been effective for up to eight months.

Some Typical Applications Include:

ODOR-MISER

- Capturing evaporated hydrocarbons and organics from storage tank vents
- Capturing odorous or toxic substances from reactor vents
- Capturing vented emissions from hood exhausts of chemical plants.
- Purifying air supplies for clean rooms

LIQUID-MISER

- Removing priority pollutants from industrial waste water
- Removal of organics from surface and ground water
- Treatment of decanter water from solvent recovery operations
- Liquid decolorization

- Determining the feasibility of installing a Hoyt solvent vapor recovery system

SPECIFICATIONS

	ODOR-MISER	LIQUID-MISER
DIMENSIONS:	36" H X 23" DIA.	36" H x 23" DIA.
FLOW RATE:	UP TO 100 CFM	UP TO 7.5 G.P.M.
CARBON:	165 LBS. OF GRANULATED ACTIVATED CARBON	165 LBS. OF GRANULATED ACTIVATED CARBON
INLET:	2" STANDARD THREAD	¾" N.P.T. NIPPLE
OUTLET:	2" STANDARD THREAD	1" STANDARD THREAD
CHARGING TIME:	NOT APPLICABLE	AT 2 G.P.M. CHARGING TIME IS 25 MINUTES
CONTACT TIME:	AT 20 C.F.M. CONTACT TIME IS 16 SECONDS	AT 2 G.P.M. CONTACT TIME IS 25 MINUTES
SHIPPING WEIGHT:	300 LBS.	250 LBS.

The Clean Air Company
In USA call toll-free 1-800-343-9411
in Massachusetts (617) 636-8811
HOYT CORPORATION
Forge Road, Westport, Mass. 02790
Hoyt Mfg. (Canada) Ltd., Montreal, Canada
Hoyt Corporation, Manchester, England

MAUL FOSTER ALONGI
1329 North State Street, Suite 301 | Bellingham, WA 98225 | 360 594 6262 | www.maulfoster.com

March 20, 2013
Project No. 0779.02.01

Mark Urdahl, Executive Director
Port of Chelan County
285 Technology Center Way, Suite 102
Wenatchee, Washington 98801

Re: Site Characterization Report, Former Cashmere Mill Site, Cashmere, Washington

Dear Mr. Urdahl:

Maul Foster & Alongi, Inc. has prepared this letter report to summarize the results of environmental site characterization activities conducted at the former Cashmere Mill Site ("the site" or "the property") located along Mill Road and Sunset Highway in Cashmere, Washington (see Figure 1). On behalf of the Port of Chelan County (the Port), previous consultants have conducted multiple rounds of subsurface investigation at the site in order to evaluate geotechnical properties of the wood waste fill (sawdust, lumber ends, bark, and wood debris), evaluate hydraulic properties in support of construction dewatering activities, and characterize the nature and extent of wood waste and petroleum-contaminated soil (PCS) in support of a removal action that will take place before redevelopment of the site.

PCS was observed at the site during geotechnical exploration and site improvement activities conducted in 2009. Subsequently, soil samples were collected and analyzed from test pits completed in 2009, 2010, 2011, and 2012 to further characterize the nature and extent of chemical impacts. This letter report provides a summary of the physical and chemical data and an evaluation of chemical impacts within the context of the Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) guidance (Washington Administrative Code 173-340). The information provided herein is intended to inform a wood waste and PCS removal action, and associated confirmation testing, that the Port will initiate under an interagency agreement with Ecology. The removal action will be conducted in order to achieve a no further action (NFA) determination from Ecology and in support of redevelopment of the site.

SITE DESCRIPTION AND HISTORY

The site background information provided in this report was largely obtained from existing reports prepared by RH2 Engineering, Inc. (RH2).

Site Description

The site is located in the City of Cashmere, along Mill Road and Sunset Highway (Figure 1). The site is approximately 32.5 acres in size, bounded to the north by the Burlington Northern

Santa Fe railroad tracks; to the east, south, and partially to the west by Brender Creek; and to the west by residential and light industrial uses. The northern boundary of the site, along the railroad tracks, is less than 100 feet from the Wenatchee River.

The site is currently vacant. There are no buildings or structures and the ground surface is unpaved. The buildings shown in the aerial photograph (see Figure 2) were demolished and removed in 2011. Five areas of PCS have been identified at the site (see Figure 2), and wood waste fill material is present throughout most of the site (see Figure 3).

The Port intends to transfer the site to a prospective purchaser (Crunch Pak of Cashmere, Washington). Crunch Pak intends to redevelop the site for commercial use as a fruit storage warehouse and fruit bin storage site. As a condition of purchase, Crunch Pak requires removal of wood waste-related materials from areas of the site that are developable, removal of soil with petroleum contamination above cleanup levels, and backfilling of the site with structural import fill to regrade the site and improve drainage.

Site History

The site was used primarily for lumber milling from the 1940s until the late 1970s and for a variety of commercial and light industrial uses thereafter (see RH2, 2007, in Attachment A). The mill produced primarily thin lumber to construct fruit packing boxes. Reportedly, no wood-treatment chemicals or processes were documented to have been used at the site. The Cedarbrook Company, owned by Mr. John Lysaker, bought the property in 1990 from WI Forest Products, and sold the property to the Port in 2007. Based on anecdotal information, the property has never been used for agriculture (Attachment A: RH2, 2007).

An accidental fire in 1990 caused some damage to mill buildings. A larger arson fire in 2000 destroyed many of the mill buildings (see RH2, 2007, in Attachment A).

Mill operations produced wood wastes that were used to fill in low-lying areas at the site. Based on characterization efforts, wood waste at the site is primarily raw wood, lumber, sawdust, and is intermixed with granular fill. Wood waste was distributed by site grading that leveled or covered wood waste stockpiles after mill activities concluded. The former mill processed raw (untreated) timber into lumber; no wood treating is known to have taken place at the site (see Forsgren Associates, Inc., 1990, in Attachment A).

Interviews with several long-time City of Cashmere residents and the Port indicate that fill was also imported to the site for several decades (see Attachment B). There are three primary areas that received fill: (1) south of Mill Road in the former log storage area, (2) the former mill pond north of Mill Road; and (3) the area north of Sunset Highway. Fill materials in these areas have been observed to consist of wood waste; silt, sand and gravel-size granular fill; and concrete and asphalt. The portion of the site located north of Sunset Highway

received fill from the City of Cashmere for a number of years. The material in this area consists primarily of silt, sand, gravel-size granular fill, and building materials, including concrete and asphalt (see Attachment A: RH2, 2007).

The Port has conducted a series of geotechnical investigations at the site since 2007 in order to characterize the nature and extent of wood waste. From 2009 to 2011, the Port also completed a series of site improvements, including the removal of asphalt-paved areas and concrete slabs and footings, primarily in the area between Mill Road and Sunset Highway. The concrete materials were crushed and stockpiled for use as fill. The asphalt pavement was sold for reuse and removed from the site. Asbestos-containing materials were removed from the two on-site buildings and then demolished. The demolition debris was reportedly disposed of off site (Attachment B).

During activities associated with the geotechnical investigations and site improvements, PCS was observed in five areas or concern at the site (see Figure 2). Focused environmental investigation work has been conducted at the site since 2009 to characterize the nature and extent of PCS in these areas. In addition, limited wood waste and soil removal actions were completed at the site in 2011 as part of a pilot wood waste interim removal action and during the reconstruction of Sunset Highway (RH2, 2013). The previous investigations and interim removal actions are discussed in the next section.

INVESTIGATIONS AND INTERIM ACTIONS

Geotechnical and environmental investigations and limited interim actions have been conducted at the site since as early as 1990. This section provides a brief summary of work completed, as well as confirmed or suspected environmental conditions identified as a result of this work. Available documentation and summaries of previous work activities and findings are provided as the following attachments to this report:

- Copies of reports summarizing previous work activities and findings, where available, are provided as Attachment A.
- The 2013 Removal Action Work Plan is included as Attachment B.
- Investigation locations are summarized in Table 1 and shown in Figure 2.
- A summary of samples collected and chemical analyses requested is included in Table 2.
- Depth to water measurements and petroleum hydrocarbon impacts observed during subsurface investigations (compiled from exploration logs) are summarized in Tables 3 and 4, respectively.

- Test pit, boring, and monitoring well completion logs are included as Attachment C.
- Laboratory analytical reports are provided as Attachment D.
- Receipts for soil that was disposed of off site as part of the interim actions are included as Attachment E.
- The 2012 Soil and Groundwater Characterization Work Plan is included as Attachment F.

Analytical data generated to date is being compiled and will be uploaded to Ecology's Environmental Information Management database in order to meet the requirements for a NFA.

1990 Phase I Environmental Assessment

In 1990, a Phase 1 environmental site assessment was performed by Forsgren and Associates, Inc., before the purchase of the property by Mr. Lysaker of the Cedarbrook Company (Forsgren, 1990, Attachment A). This assessment identified evidence of de minimis soil contamination from lubrication oils at several locations south of Mill Road, and concluded that the contamination likely existed only in shallow soil. Underground storage tanks (USTs) were observed, and a recommendation was made to remove them or upgrade them up to be compliant with the current code at that time (see Figure 2 for approximate former locations of the UST's). Asbestos (in existing building materials), electrical gear, and transformers were also identified as potential environmental conditions. No samples were collected in association with this work.

Mr. Lysaker communicated to RH2 that the items identified in the Forsgren environmental assessment were remedied before or immediately following his purchase of the property (see Attachment B). Mr. Lysaker states that, before he took ownership, WI Forest Products removed one diesel UST from the vicinity of the former mill office and one gasoline UST from the vicinity of the former truck shop (Attachment A: RH2, 2007). The volume of both of these tanks is unknown. He also states that WI Forest Products completed removal of electrical gear and transformers, from the site, before his purchase of the property and that asbestos removal was completed by WI Forest Products after he took ownership of the property. Reports documenting removal of USTs, electrical gear, and asbestos were not prepared or may have been destroyed in the 2000 mill fire.

2007 Feasibility Study

RH2 completed a feasibility study on behalf of the Port before the Port's purchase of the site. The feasibility report included a limited environmental assessment and a geologic assessment

(RH2, 2007, in Attachment A). Fourteen test pits were completed in association with the geologic assessment in order to characterize the wood waste composition and distribution (TP-1-2007 to TP-14-2007). The environmental assessment included a historical review and interviews with several community members. No evidence of petroleum-related contamination was recorded in the test pit logs and no soil or groundwater samples were collected for chemical analysis.

2008 Wood Waste Summary

In 2008, RH2 conducted a literature search and regulatory review to determine potential environmental impacts that may result from wood waste on the site and potential reuse options for excavated wood waste material. Their findings are summarized in a letter report (RH2, 2008, in Attachment A), in which they conclude that wood waste at the site may result in the following environmental impacts:

- The decomposition of wood waste may result in the production of unsafe levels of methane gas.
- If exposed, the wood waste may disperse in the air as fine particulates and present a breathing hazard.
- The decomposition of wood waste may result in the generation of leachate. Wood waste leachate may exhibit chemically reducing conditions (low dissolved oxygen [DO] and low hydrogen ion potential [pH]), which could potentially dissolve metals from the granular aquifer material, resulting in elevated metals concentrations in groundwater and/or surface water.

Additionally, petroleum hydrocarbons or wood-treating chemicals may also be present in the wood waste at the site. Wood waste samples collected in August 2012 were analyzed for petroleum hydrocarbons, metals, and chemicals potentially associated with wood-treating activities (phenols and polycyclic aromatic hydrocarbons [PAHs]), as discussed below. Water quality testing for field parameters, including pH and DO, and air quality testing have not been conducted at the site.

2009 and 2011 to 2012 Sunset Highway Improvements

On May 7, 2009, RH2 conducted a limited subsurface investigation along Sunset Highway in order to evaluate geotechnical conditions in support of the water main extension project. Petroleum impacts were observed in soil and groundwater in one test pit completed on the site (TP-2-052009); this area is identified as PCS "Area 1." No samples were collected for analytical testing; however, additional investigation work was conducted in September 2009 and August 2012 to further evaluate the extent of impacted soil.

In 2009, asphalt-paved areas and concrete slabs and footings were removed from the area between Mill Road and Sunset Highway in support of the water main extension. PCS was discovered underneath a former concrete slab in the area identified as PCS "Area 2." Follow-up investigation work was conducted in October 2009 and August 2012 to evaluate the extent of soil impacts.

In 2011 and 2012, the Port reconstructed a section of Sunset Highway and, during construction, PCS was removed from the road realignment in the vicinity of sample locations S-4-092009 and S-5-092009 (see Area 1 in Figure 2), and then disposed of off site (RH2, 2013). Samples were collected from the excavated material for characterization purposes and analyzed for metals by U.S. Environmental Protection Agency (USEPA) Methods SW846 6010 (arsenic, barium, cadmium, chromium [total], lead, selenium, and silver) and SW846 7471 (mercury); samples are associated with the "Area 1 Soil Removal Area" in Tables 1 and 2. Waste disposal tickets indicate that approximately 105 tons of PCS was removed from the site in three batches in January and April 2012 (see Attachment E); however, this quantity of material may also include PCS disposed of in association with the 2011 pilot wood waste interim removal action.

2009 Environmental Investigations

Following the discovery of petroleum impacts in soil in test pit TP-2-052009 and beneath a concrete slab formerly located between Mill Road and Sunset Highway (Areas 1 and 2, respectively), RH2 conducted follow-up environmental investigations in September and October 2009. In a 2009 letter from the Port, Ecology was notified of the discovery of PCS. The notification letter includes an attachment from RH2 detailing the discovery of PCS and a sampling and analysis plan for conducting follow-up investigation work (Attachment A: RH2, 2009).

Test pits were completed in the PCS areas in order to evaluate the extent of petroleum impacts (test pits S-1-092009 to S-8-092009 in Area 1 and TP-2-102009, TP-5-102009, and S-2-102009 to S-5-102009 in Area 2). Soil samples were collected from selected test pits, based on field observations, and analyzed for gasoline-range petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Gasoline-Range Organics (NWTPH-Gx) Method and for benzene, toluene, ethylbenzene and xylenes (BTEX) by USEPA Method 8021B, modified. One sample (from test pit S-4-092009) was also analyzed for diesel-range petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Diesel- and Heavy-Oil-Range Organics (NWTPH-Dx) Method. Analytical results and findings of this investigation work are discussed in the Investigation Results section of this report.

2010 Geotechnical Investigation

The Port contracted GeoEngineers, Inc. (GeoEngineers) in 2010 to perform a detailed geotechnical evaluation of the site in support of the Port's redevelopment plans (GeoEngineers, 2010, Attachment A). GeoEngineers drilled seven borings (B-1, B-1A, B-2, B-2A, and B-3 to B-5) and completed two borings as monitoring wells (B-1 and B-2). During the geotechnical investigation, hydrocarbon impacts were observed in boring B-1; this area is identified as PCS "Area 3." At the request of RH2, and on behalf of the Port, GeoEngineers drilled two additional borings (B-6 and B-7) and collected and analyzed soil samples for diesel-range hydrocarbons by NWTPH-Dx in order to evaluate the nature and extent of PCS in Area 3. No groundwater samples were collected from the borings or the monitoring wells. Analytical results and findings of this investigation work are discussed in the Investigation Results section of this report.

2011 Groundwater Table Investigation

In support of a wood waste removal action, RH2 performed a limited groundwater investigation in 2011 consisting of depth-to-groundwater measurements at several test pit locations (TPGW1 to TPGW12) (RH2, 2011, Attachment A). The depth to the water table ranged from 1.5 to 4.5 feet below ground surface (bgs) in the area south of Mill Road, and 2 to 5 feet bgs between Mill Road and Sunset Highway (see Table 3). RH2 produced a groundwater contour map as a result of this investigation (RH2, 2011, Attachment A).

During the investigation, petroleum impacts were observed in soil in test pit TPGW1; this area is identified as PCS "Area 4." A soil sample was collected from a second test pit completed in the same location (S-1-2011) on July 6, 2011, to be analyzed for petroleum hydrocarbons. The sample was analyzed for the presence of petroleum hydrocarbons by the Northwest Total Petroleum Hydrocarbon—Hydrocarbon Identification (NWTPH-HCID) Method. Based on the results, the sample was also analyzed for diesel-range organics by NWTPH-Dx. Analytical results from this sample are discussed in the Investigation Results section of this report.

2011 Pilot Wood Waste Interim Removal Action

The Port completed a limited wood waste interim removal pilot project in the southeast portion of the site in 2010 and 2011 (see "Pilot Wood Waste Removal Area" in Figure 2). The Port hired a contractor to remove surficial wood waste from this portion of the site. The contractor screened the wood waste, removed the larger rocks and wood pieces, and then sold the remaining material as landscape material. Crushed concrete that was previously stockpiled on site from slab removal was used to fill the excavated area. PCS was identified in the wood waste excavation area during the interim removal action; this area is identified as PCS "Area 5." The soil was stockpiled, a composite sample was collected from the stockpile, and the soil was disposed of off site (RH2, 2013); samples are associated with the "Pilot

Wood Waste Removal Area" in Tables 1 and 2. The samples were analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID. Based on the results, one sample was also analyzed for diesel-range organics by NWTPH-Dx with silica gel cleanup. The quantity and extent of PCS removed are not known.

2012 Wood Waste, Soil, and Groundwater Investigation

RH2 performed an additional investigation in August 2012 to evaluate wood waste thickness and composition in unexplored areas, to evaluate hydraulic properties and groundwater quality, and to evaluate whether PCS remains in Area 1 surrounding the excavation limits. Work was conducted in accordance with the Wood Waste, Soil, and Groundwater Characterization Plan included as Attachment F. Wood waste samples were generally analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID (one sample was also analyzed for diesel-range petroleum hydrocarbons by NWTPH-Dx with silica gel cleanup); for chemicals potentially associated with-wood treating activities, including total metals (arsenic, chromium [total], copper, and lead) by USEPA Method 6010C; and for PAHs and phenols by USEPA Method SW8270D. Soil samples were generally analyzed for the presence of petroleum hydrocarbons by NWTPH-HCID; for gasoline-range hydrocarbons by NWTPH-Gx; and for BTEX by USEPA Method 8021B modified. Selected samples were also analyzed for extractable and volatile petroleum hydrocarbons (EPH and VPH) by methods NWTPH-EPH and NWTPH-VPH, respectively. Analytical results from this investigation are discussed in the Investigation Results section of this report.

A dewatering test well was constructed to evaluate groundwater conditions, including aquifer characteristics, and dewatering requirements in support of the planned wood waste removal action (RH2, 2012, Attachment A). A groundwater sample was also collected from the dewatering well and analyzed for gasoline- and diesel-range petroleum hydrocarbons by NWTPH-Gx and NWTPH-Dx, respectively; for chemicals potentially associated with wood-treating activities, including metals (arsenic, chromium [total], copper, and lead) by USEPA Method 6010C; and for PAHs and phenols by USEPA Method SW8270D. Aquifer test results are discussed in the Geology and Hydrogeology section of this report; analytical results from the 2012 investigation are discussed in the Investigation Results section.

PHYSICAL SETTING

The physical characterization of the site, as described in this section, presents a compilation of information obtained from the multiple investigations discussed in the previous section. The following discussion was largely obtained from existing RH2 reports.

Hydrology

The site is mostly bounded by water features, including the Wenatchee River to the north, and Brender Creek to the west, south, and east. Brender Creek flowed directly to the Wenatchee River before construction of the railroad, but today flows in a long, curving channel about 100 feet north of the southern property line. Brender Creek's year-round flow around the site has raised the local groundwater table and created hydrologic conditions favorable for establishing wetlands. Brender Creek drains about 8 square miles and discharges to Mission Creek about 150 feet from the northeast corner of the property. Mission Creek lies east of the site, drains about 79 square miles, and discharges into the Wenatchee River approximately 800 feet east-northeast of the site.

An irrigation return ditch flows about 1,000 feet from west to east along the southern shoulder of Mill Road. The ditch is open near the western boundary of the site, where it forms a small pond. From there, the water flows in a culvert for approximately 600 feet. The ditch is open for about 180 feet along Mill Road near the former Cedarbrook shop. Near the eastern boundary of the property, water enters a culvert that crosses Mill Road and flows approximately 500 feet to discharge into Brender Creek. The ditch is open for about 6 feet before reentering a culvert beneath Sunset Highway.

In the mid-1990s, the property owner undertook a conservation effort in cooperation with the Washington Department of Fish and Wildlife and Chelan County Conservation District to enhance aquatic habitat in over 2,000 feet of Brender Creek. This effort required excavation of sediment in the stream channel, resulting in a large berm that parallels the creek. The berm is approximately 10 feet high, 60 feet wide, and 1,000 feet long.

Geology and Hydrogeology

The site is underlain by unconsolidated Quaternary glacial and alluvial sediments and sedimentary bedrock of the Chumstick Formation (Tabor et al., 1987). The site is located in a bend in the former channel of the Wenatchee River. The river bend was cut into a glacial outwash terrace, forming a cut bank approximately 20 feet high south of Brender Creek. Alluvium was deposited as the river channel incised the surrounding terraces. Brender Creek flows along the base of the river cut bank. Much of the site was formerly occupied by ponds and bogs along the river floodplain. These topographic depressions were filled at various times with wood debris from mill activities and other fill materials imported to the site. The three primary areas that received fill include the area north of Sunset Highway, the former mill pond area north of Mill Road, and the former log storage area south of Mill Road. In most places, fill was placed directly on top of Wenatchee River alluvium.

Fill material includes wood waste; granular fill (sand, silt, and gravel with organic material, including logs); and inert fill (concrete, asphalt, metal, lumber, and other building materials).

Most of the fill observed during fieldwork consists of slightly decomposed wood waste or granular fill containing wood waste.

The depth to groundwater observed in test pits and one monitoring well at the site ranged from 2 to 13 feet bgs (Table 4). According to RH2, groundwater elevations observed in May and June 2011 and August 2012 show a decreasing water table gradient from the southwest toward the northeast portion of the site (see Figure 4 and RH2's 2011 Groundwater Table Investigation Memorandum included in Attachment A). The observed water table gradient indicates that shallow groundwater at the site likely flows toward, and likely discharges to, the Wenatchee River to the northwest of the site. The groundwater table likely fluctuates seasonally in response to precipitation patterns and flow variations in Brender Creek and the Wenatchee River (GeoEngineers, 2010, Attachment A).

An aquifer transmissivity of 32,000 gallons per foot per day was estimated based on the results of the pumping and recovery test conducted in the dewatering well (location DW01 in Figure 2) in 2012.

INVESTIGATION RESULTS

This section provides a summary of the soil, wood waste, and groundwater chemical data collected during investigation activities conducted from 2009 to 2012. Petroleum hydrocarbon impacts observed during subsurface investigations (compiled from exploration logs) are summarized in Table 4. Soil and wood waste analytical results are summarized in Table 5. Groundwater analytical results are summarized in Table 6. Chemical concentrations in soil exceeding applicable cleanup levels are presented in Figure 5.

The analytical data were screened relative to MTCA cleanup levels in order to evaluate the potential for human health risks. Analytical results were compared to MTCA Method A, unrestricted land use, table values. The lower of the carcinogenic and non-carcinogenic MTCA Method B, standard formula values were used for chemicals with no available Method A cleanup level.

Soil and Wood Waste

Hydrocarbon impacts were observed in soil and wood waste in multiple locations of the site during subsurface investigation activities (see Table 4). Hydrocarbon impacts (e.g., odor, sheen) were observed in soil in the PCS areas during exploration activities and during the pilot wood waste interim removal action and water main extension activities. In addition to the five known PCS areas, hydrocarbon impacts were observed in soil and wood waste in test pit locations completed in August 2012 (see Table 4). Soil samples were collected and analyzed for petroleum hydrocarbons from the PCS areas and the August 2012 test pits with observed impacts, with the exception of test pits TP-13-2012, TP-16-2012, and TP-17-2012.

According to Ecology guidance, in the absence of hydrocarbon identification data (by NWTPH-HCID), the diesel- and motor-oil/heavy-oil-range hydrocarbon fractions should be summed for comparison with the MTCA Method A cleanup level (Ecology, 2004). In accordance with this guidance, the diesel- and motor-oil/heavy-oil-range hydrocarbon concentrations detected in samples that were not also analyzed for NWTPH-HCID were summed for comparison to the heavy oils cleanup level. Heavy-oil-range hydrocarbons were analyzed in soil samples from Areas 1 to 5, in stockpiled soil excavated from the Pilot Wood Waste Removal Area (Area 5), and in one wood waste sample (TP-24-2012). Heavy oils were detected in the wood waste sample and in the samples from Areas 2 to 5. Heavy oils concentrations above the MTCA Method A cleanup level were detected in Areas 2 and 3. Other chemical detections in soil and wood waste were below cleanup levels.

Gasoline-range petroleum hydrocarbons were analyzed in soil samples collected from Areas 1 and 2, but detected only in Area 1. Gasoline-range hydrocarbon concentrations in Area 1 soil exceeded the MTCA Method A cleanup level (see Figure 5).

Soil samples from Areas 1 and 2 were analyzed for BTEX. Ethylbenzene, toluene, and xylenes were detected in soil from Area 1. Concentrations were below applicable MTCA Method A cleanup levels.

Metals (arsenic chromium, copper, and lead) and PAHs and phenols (4-methylphenol and pentachlorophenol) were detected in wood waste samples collected from multiple locations at the site, but concentrations were below MTCA Method A cleanup levels. Metals were also analyzed in a sample collected from the stockpiled soil excavated from the Area 1 Soil Removal Area (Area 1) for disposal characterization. Concentrations were below MTCA Method A cleanup levels.

Groundwater

Petroleum impacts have been observed in groundwater at the site. A sheen on groundwater was observed in three subsurface explorations: test pit TP-2-052009 (Area 1), boring B-1 (Area 2), and boring B-6 (Area 2) (see Table 4); however, groundwater samples were not collected from these locations. Three wells have been completed at the site (monitoring wells B-1 and B-2 and dewatering well DW01); a groundwater sample was collected from the dewatering well only. According to RH2, the monitoring well at boring location B-2 was damaged or is not locatable. The condition of the monitoring wells is not known. It is likely the wells will be removed as part of a site removal action.

Petroleum hydrocarbons, BTEX, PAHs, and phenols were not detected in the groundwater sample from the dewatering well. Arsenic, copper, and lead were detected, but were below their respective MTCA Method A cleanup levels.

The dewatering well is screened in the native material below the fill and is presumed to be hydraulically upgradient of the known PCS areas. Additionally, the well was installed in the pilot wood waste interim removal area. Therefore, groundwater from this well likely is not representative of groundwater conditions affected by PCS or wood waste.

Summary

Groundwater quality in the vicinity of the dewatering well does not appear to be impacted by site-related sources. However, this sample likely is not representative of groundwater conditions affected by sources at the site. Chemical impacts due to site-related sources may be present in groundwater.

Chemical concentrations in wood waste were below applicable cleanup levels; however, these chemicals, where detected in wood waste and wood waste samples, were collected from limited areas of the site. Chemical concentrations may potentially be present in wood waste in areas of the site not sampled.

Heavy oils exceedances were observed in soil in Areas 2 to 3; however, the extent of soil with chemical exceedances is not well-delineated. Surrounding test locations either were not sampled, or the samples were not analyzed for diesel-range hydrocarbons. Gasoline-range hydrocarbon exceedances were detected in Area 1; however, gasoline-impacted soil was removed during the reconstruction of Sunset Highway and chemical concentrations in samples collected from test pits surrounding the excavation extent were below cleanup levels.

REMOVAL ACTION

In order to prepare the site for redevelopment and to obtain an NFA determination from Ecology, a wood waste and PCS removal action, followed by confirmational groundwater monitoring, will be conducted at the site. The details of the proposed action are outlined in the Removal Action Work Plan (Attachment B). The extent of wood waste that will be removed is shown in Figure 3. PCS will be removed concurrent with the wood waste removal.

Although chemical impacts to wood waste and soil at the site have not been fully delineated, the planned removal action is designed to identify and remove material with chemical concentrations above screening levels. Groundwater will be monitored for a period of time following the removal action.

Wood waste will be excavated to the underlying native alluvium in developable areas of the site (see Figure 3). Once exposed, the native alluvium will be field screened for petroleum impacts, and confirmation samples will be collected in a grid pattern and analyzed for petroleum hydrocarbons and wood-treating chemicals. Areas of the excavations exhibiting

MTCA Method A cleanup level exceedances, based on the grid sampling results, will be overexcavated until the remaining material meets cleanup levels.

Areas with confirmed petroleum hydrocarbon concentrations above MTCA Method A cleanup levels will be excavated. Additional areas where PCS is suspected, based on field observations made during the wood waste removal, will also be excavated. The excavation extents will be determined based on field screening and confirmation sampling. Areas of the excavations exhibiting MTCA Method A cleanup level exceedances, based on the confirmation sampling results, will be overexcavated until the remaining soil meets cleanup levels or to the extent practical given site conditions and dewatering activities.

A groundwater monitoring well network will be installed following the removal action. The network will be designed to monitor groundwater flow directions and groundwater. The objective of the groundwater monitoring is to confirm that chemical concentrations in groundwater (if any) are below applicable cleanup levels. Groundwater monitoring results will be used to inform ongoing monitoring and/or groundwater remedial actions that may be required in order to meet cleanup levels.

SUMMARY AND CONCLUSIONS

Petroleum hydrocarbons are present in soil in Areas 2 and 3 of site at concentrations above applicable cleanup levels. Chemical concentrations in wood waste were below applicable MTCA cleanup levels and were not detected in a groundwater sample collected from the dewatering well. However, the groundwater sample collected from the dewatering well is not considered representative of groundwater conditions and heavy oils exceedances in soil are not well-delineated.

The removal action is intended to remove wood waste and known PCS and identify and remove additional contaminated material above applicable cleanup levels. The proposed groundwater monitoring activities will provide additional characterization of groundwater contamination. The results of the soil confirmation and groundwater sampling that will be conducted as part of the removal action will provide the additional information needed by Ecology to make an NFA determination.

Sincerely,

Maul Foster & Alongi, Inc.

Heather Hirsch, LHG
Project Hydrogeologist

Justin Clary, PE
Principal Engineer

Attachments: Limitations
References
Tables
Figures
A—Previous Investigation Reports
B— Removal Action Work Plan
C—Test Pit, Boring, and Well Installation Logs
D—Laboratory Analytical Results
E—Soil Disposal Tickets
F—Soil and Groundwater Characterization Work Plan

cc: Mary Monahan, Washington State Department of Ecology

LIMITATIONS

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Site	NUVi	Legend	Rhino 650	Location
1	404	397	411	My backyard 8438 Meadowbrook
2	389	406	411	Alpine Coach Works
3	406	415	404	At the Weir Boarst lake
4	417	396	402	West end Boarst lake
5	414	385	407	At the Jersey barriers Mill pond Rd.
6	408	394	408	5 Mile Entrance
7	403	389	409	Entrance to PSE & Snoq. Pkwy entrance at 202
8	393	387	395	South end Xmas tree lot
9	364	403	392	Xmas lot at 202
10	370	395	394	Parking lot off 202 at Northern
11	376	403	399	Parking lot off 202 at Fir
12	386	400	404	King & Maple intersection
13	407	400	405	River and Maple Intersection
14	391	406	407	Intersection Newton & Maple
15	369	404	406	Intersection Newton & Falls
16	387	401	409	Intersection River & Falls
17	381	399	406	King & Falls at North end of parking lot
18	394	397	409	King & Railroad at Bus stop
19	369	402	403	Intersection River & Park
20	399	394	403	Intersection Newton & Park
21	386	396	407	Intersection Schusman & Park
22	382	407	411	Intersection Meadowbrook & Park

Readings are in feet

Taken on 01/26/2019

Rhino 650 readings are most accurate using barometric pressure/topograpy for analysis
Nuvi & Legend HCX use topography and are accurate when comparing to topographic maps of area

Exhibit C - Public Comments
Page 449
Snoqualmie Mill PCI Plan Hearing

Jason Rogers

From: Julie Lake <juliehlake@gmail.com>
Sent: Wednesday, March 30, 2022 3:33 PM
To: Gwyn Berry
Subject: Public Hearing Comment--Mill Site

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

Snoqualmie Mill Ventures (SMV), the developer in question here, has a long history of dozens of instances of ignoring requirements outlined in the Snoqualmie Municipal Code.

See:
9/2/2021 https://crosscut.com/environment/2021/09/one-most-polluted-sites-wa-being-targeted-development

"One lawsuit has already been filed. On Feb. 26, 2021, the Waste Action Project of Seattle organization filed a lawsuit in U.S. District Court in Seattle against the site's owners and developers."

"Still in its preliminary stages, the lawsuit seeks a judgment that the owners and developers have violated the U.S. Clean Water Act by not tracking and dealing with rain falling on the area, soaking into the ground, becoming polluted with toxic materials and seeping toward the Snoqualmie River. In addition to federal fines, the Waste Action Project is trying to force the developers to deal with the underground pollution."

[I have personally called this issue to the attention of the City of Snoqualmie and the Snoqualmie City Council numerous times, to no avail.]

The City of Snoqualmie has a history of ignoring such offenses by developers, not enforcing requirements, and even issuing permits retroactively after the Developer Tom Sroufe of SMV was caught by citizens two years in a row, illegally clearing and grading land at the Mill Site.

Given the City's history of leniency towards developers, there is no guarantee or reason to believe the City of Snoqualmie would hold SMV to any agreements, and no guarantee or reason to believe SMV would abide by the rules.

Regarding the City of Snoqualmie's lenience to scofflaw developers, in the case of the developer Chun Lai Hospitality, who built a hotel on Snoqualmie Ridge, the City failed to hold the developer accountable to make sure that the hotel was self-inspected or had provided the required funds to do so.

I might add that former Mayor Matt Larson served on the Board of the developer's unaccredited online Tech "University" at the time all of this was taking place.
Only after a citizen filed a Pubic Records Request revealing the non-compliance was the hotel required to take action.

See:
3/18/2022 https://www.valleyrecord.com/news/snoqualmie-hotel-pays-150000-in-missing-funds/

"Chun Lai first entered into a development agreement with the city to build its hotel on the Snoqualmie Ridge in 2017, under the requirement it remain a Hampton Inn franchise for at least 20 years in an effort to regulate prices."

"Two years after opening the hotel, however, Chun Lai submitted a request to the city asking for an amendment to that agreement, which would allow the hotel to operate independently."

[This means after they broke the agreement with the City, they would be required to self-inspect.]

"A decisive 4-3 vote by the city council in December 2020 allowed the change under the condition that Chun Lai provide $150,000 in assurance funds and perform regular audits."

"Chun Lai Hospitality LLC, owners of the Snoqualmie Inn by Hotel America, were required under an agreement with the city to make an initial $60,000 deposit into a segregated bank beginning in December 2020. That was to be followed by monthly payments of $15,000 until funds totalled $150,000. None of those funds were deposited until last week."

There is no reason to believe that SMV developers would follow through on building what they propose to build, or clean up the rest of the site after developing on the least polluted section, Phase 1.

Phase 1 is the section where the SMV developer Tom Sroufe promised the Japanese Cultural Community Center of Washington (JCCCW) that SMV would construct a memorial to the history of the Japanese Community at the Mill Site, but instead, they plan to put a paved parking lot over buried historical Japanese cultural artifacts. These are Japanese items that the Japanese Community threw into their outhouses when they were about to be taken away to be incarcerated; they are *not* "domestic debris" as the Staff Report disparagingly describes them.

Fortunately, the Department of Ecology regards the entire Mill Site property as one cleanup site, but we cannot trust that SMV would follow through, especially with their references to phased development, nor that the City of Snoqualmie or even the Department of Ecology would hold them accountable to clean up the rest of the site.
I recommend an additional condition be added to the criteria listed under "Conditions Related to PCI Plan Approval Criteria" of the staff report found on p. 46 at:
https://www.snoqualmiewa.gov/DocumentCenter/View/34304/Snoqualmie-Mill-Staff-Report-PCI-Plan-032222

The additional condition I recommend is that no permits be issued for any part of this proposal until the entire site has been cleaned up according to criteria required by the Department of Ecology, and that there be a legally binding agreement of some sort requiring the City of Snoqualmie to hold SMV accountable to following *all* of the rules, *all* of the time.

One more point: SMV claims thousands of jobs will be created by their development. I would like to point out that as of a few months ago, there were 3000 job vacancies in the Snoqualmie Valley, because workers cannot afford to live here, and there is a lack of transit opportunities for commuting. Why add more open positions that can't be filled? See:
https://www.valleyrecord.com/news/lack-of-transit-housing-crisis-and-pandemic-fuel-local-labor-shortage/

Thank you for your time, and for your attention to this comment,

~Julie H. Lake
Resident of Snoqualmie, WA

--
Julie H. Lake
PO Box 1748
Snoqualmie, WA
98065-1748
303-819-0096

Jason Rogers

From: cristie coffing <imouttolunch@hotmail.com>
Sent: Wednesday, March 30, 2022 3:34 PM
To: Gwyn Berry
Subject: RE: Snoqualmie Mill Planned Commercial/Industrial PlanPCI 17-0001
Attachments: Response to PCI Plan.docx

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

Gwyn,

Please find attached my comments in regards to:
RE: Snoqualmie Mill Planned Commercial/Industrial PlanPCI 17-0001

Thank you,
Cristie Coffing
imouttolunch@hotmail.com

March 30, 2022

City of Snoqualmie
Office of the Hearing Examiner
MS Sharon A Rice
C/o Gwyn Berry

Transmitted electronically to gberry@snoqualmiewa.gov

RE: Snoqualmie Mill Planned Commercial/Industrial Plan
PCI 17-0001

I would like to submit my comments on the above referenced project application.

- I would like to first address the historical significance of the site and the presence of cultural artifacts. Until these are addressed adequately, no plan should be approved or permit issued.

Jennifer Meisner, King County Historic Preservation Officer, states in her response to the DEIS:

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

The FEIS response states: pg. 192-193 (3-82 – 3-83)

The applicant has committed to continuing to consult with agencies with jurisdiction and expertise, tribes, and with interested organizations to develop a plan to incorporate elements of the site's history into the development plan. In these discussions, the applicant will also address the timing and responsibility for submitting an NRHP nomination.

In addition, as identified in the EIS, the applicant will continue to investigate the physical and financial feasibility of rehabilitating and reusing the Planer building and the Powerhouse within the potential historic district.

The Washington State Department of Archaeology and Historic Preservation (DAHP) requirements for submitting documents are acknowledged.

This response is inadequate as it leaves a gap of relevant information and potential is not a commitment to a historic district on the developer's part. In the response from Jennifer Meisner, it has been brought to the petitioner's attention the buildings and areas that are relevant to historic significance, so there is no question as to the contributing buildings and spaces that need to be protected, and they are listed in the table- *Exhibit 3.10-1. Draft EIS Evaluations of Cultural Resources.* In addition, the nomination should be completed prior to development approval, so it is known from the commencement of construction and excavation activities what buildings and areas are to be protected and restored. Also, if the petitioner is proposing a multi-million dollar

development, which will garner said developer multi-million dollar returns, the financial feasibility of restoring historic and culturally significant buildings is irrelevant. In addition, a building that is eligible for the National Historic Register is also eligible for numerous state and federal grants put forth for the purpose of historic preservation. To reiterate, the eligible buildings, the known Japanese Community Archeological Site (45K11474), and the Snoqualmie Falls Lumber Company Historic District should be nominated prior to any approvement of development. To say it will be addressed as the project moves forward is a phased review.

Comments to the DEIS by David Inoue of the Japanese American Citizens League, and several other commenters, addressed the presence of culturally significant artifacts in two trenches within Planning area 1 and a third trench "off the grid" and called for a full excavation. Inoue states, "We urge you to perform your true due diligence to fully assess the site within planning area 1 for evidence of the past community. Only a full excavation that has the potential to reveal so much about the community that was suddenly uprooted and forced to leave so many belongings that are likely still buried beneath the burned ruins of their homes". He also states, "If development is allowed to proceed without further assessment, the opportunity to gain this knowledge will likely be lost so long as the development is in place covering the site, and even worse, could destroy permanently invaluable remnants of the past". These concerns are inadequately addressed in the FEIS. They are summarized in the FEIS as follows: pg. 197 (3-87)

Comments stating that additional mitigation is necessary to compensate for impacts to resources in Planning Area 1 are acknowledged. However, the EIS does not identify any significant impacts, as defined in SEPA, to the one culturally significant resource within the boundaries of Planning Area 1, 45-KI-1474, or the culturally significant buildings and structures in Planning Areas 2 and 3. Therefore, additional mitigation was not recommended.
As noted above, the applicant has committed to consult with DAHP, the JCCCW, and JACL to identify potential measures that could be incorporated into the proposed PCI Plan to memorialize the contribution of the Japanese community to the history of the area, including during World War II, and the Snoqualmie Mill. The applicant's stated project objectives include preserving and/or integrating valuable elements of this history in development plans where feasible (Draft EIS, page 2-12)

In regards to the presence of significant archeological artifacts in Planning Area 1, the above acknowledges the fact, but the response goes on to state: pg. 196-197 (3.86 – 3.87)

However, the archaeological professional who performed the survey and prepared the assessment report concluded that systematic data recovery from the site is not feasible and further survey to delineate the resource would be likely to adversely affect the site. The site is submerged below the upper limit of groundwater, and the eight closest probes indicate that the overlying fill is between 9 feet and 16 feet thick (also refer to Draft EIS Appendix A, Figure 4-3) which identifies fill in the general area as being between 10 feet and 20 feet thick). The fill also contains logs and boulders, and heavy equipment would be required to remove it; any excavation would be "blind" and would entail a high likelihood of causing damage to the resource. The general location of the bunkhouse, as interpolated from the probes and geology, is shown on Figures 11 and 14 in Draft EIS Appendix E (pages 32 and 44, respectively). The proposed PCI Plan would construct a parking area over a portion of the Japanese community site, but the archaeological site has enough overburden that compression is not expected to damage any buried resources. Furthermore, the site would not be affected or rendered permanently inaccessible, being only covered by asphalt. This assumption could be

confirmed by an engineering professional when project design is sufficiently advanced; review and confirmation has been added as a mitigation measure. In addition, or alternatively, the applicant will consult with DAHP following PCI Plan approval, and prior to any construction activity, to determine whether additional survey work regarding the Japanese community site is recommended. The site survey also generated sufficient information to enable the archaeologist to interpret sediments and conclude that other portions of Planning Area 1 had a low probability of containing physically intact archaeological resources that would be affected by development. Comments disagreeing with this conclusion are acknowledged. It should be noted that the Cultural Resources Assessment recommends that Planning Area 1 design plans be reviewed by a professional archaeologist (at 30%, 60%, and 90% design) to evaluate whether additional archaeological investigation is feasible, and/or if archaeological monitoring is recommended during ground-disturbing work or construction.

It should be noted that according to -https://www.nationalgeographic.org/encyclopedia/artifacts/ An artifact does not have to be intact in its entirety to be culturally significant. The resource states:
An artifact is an object made by a human being. Artifacts include art, tools, and clothing made by people of any time and place. The term can also be used to refer to the remains of an object, such as a shard of broken pottery or glassware.
Therefore, the broken china, discarded leather shoes, bottles, etc. are valuable cultural resources. David Inoue of the Japanese American Citizens League further states in his response to the DEIS, "The Snoqualmie site is of vital historic significance to our Japanese American community and to the historical context of our nation at a time when under the guise of national security, blatant racism was allowed to disrupt and wipe out an entire community".

The response of the FEIS contradicts the fact that the DEIS states trench 45-Kl-1474 to be located 8.5 ft below the surface. To state that the artifacts are more than likely 9 to 16 ft below surface is lacking as a concrete response and is a response that circumvents the response requested for a full archeological dig. It is also noted in the DEIS that it appeared more artifacts were at the top of Stratum V, which is 300cm -400cm, or 9.8ft- 13ft. The FEIS response states artifacts may be too deep for excavation, this merely evades the comment. Waiting until the project design is sufficiently advanced deflects the significance of culturally significant artifacts and sites. A correct response would be excavation first, NHRP designation of buildings, trenches, bunkhouse and bathhouse sites, and a Snoqualmie Falls Lumber Company Historic District secondly, then a plan that works in accordance with the important historical and culturally sensitive sites, buildings and archeological finds. History destroyed is history forever lost. History paved with asphalt is history forever lost. The FEIS responses leave gaps in information concerning potential significant impacts and do not adequately address the call for historic preservation and archeological excavation. No PCI Plan should be approved until cultural resources have been addressed properly.

"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." (pg. 27 Staff Report) – Calling the cultural artifacts of forcibly interned Japanese American's is gross negligence. This is verbal

gymnastics to minimize the significance of the Japanese American's contribution to the success and historic relevance of the Snoqualmie Mill Site. Please see attached for a full history of the contribution and vast importance of the Japanese American's at the Snoqualmie Mill Site. No PCI Plan should be approved until cultural resources are adequately addressed. https://www.youtube.com/watch?v=2Yt22hSqEe8 and the emergency resolution put forth the developer by the Japanese American Citizens League which has not been adequately responded to: https://drive.google.com/file/d/1pMFxcPDm614qLhZa9gWoOoMo6Ybsh-jL/view

In addition:

- The Plan would create a gigantic regional employment center with 3500 jobs, most of which will probably not be family wage jobs. Currently there are 3,000 jobs available in the Snoqualmie Valley that are yet to be filled. November 20212 article:https://www.valleyrecord.com/news/lack-of-transit-housing-crisis-and-pandemic-fuel-local-labor-shortage/ which states- "There are an estimated 3,000 vacant positions across the Snoqualmie Valley, with fears that businesses will close or move out if labor is not found soon. The wages paid for the jobs promised are not an adequate amount of money to allow employees to acquire housing within the Snoqualmie Valley."- This will cause an increase in traffic and pollution with the influx of a commuting workforce. Add to this tourist traffic and the problem will become monumental. The traffic study used to support this development was conducted years ago in February during heavy snow, thus producing an inaccurate traffic analysis.

- Snoqualmie is a rural city in a rural valley and cannot support this scale of development financially or environmentally.

- "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." (pg. 14 Staff Report) – This is unacceptable and puts citizen's health and safety at risk, not to mention exacerbating the present climate crisis, damaging existing wildlife and increasing water temperatures. Items 44- 58 are erroneous and present valid reason to deny the existing PCI Plan.

- The Plan would disrupt rural activities such as farming.

- The Plan will increase flooding, significantly harm wildlife, increase air and light pollution, thus affecting nearby species of insects and amphibians. The Plan will potentially harm the waterways from the Snoqualmie River to the Salish Sea.

- The Plan will have a devasting impact on the current economic health of the downtown historic district and the business community on the ridge. The plan includes restaurant uses (approximately 15,000 sf), specialty retail (49,000 sf), and indoor event center spaces (31,000 sf), virtually making it a self-contained destination.

- The Plans were worked behind closed doors without any meaningful public input until they were released to the Public during the holiday season and a COVID surge.

- The Site is the second most polluted site in the State, second only to Hanford according to the Department of Ecology. The Plan has virtually no meaningful data regarding the types and levels of toxic pollutants on the site. Instead, the Plan punts these issues to some future time and processes. The plan is relying upon the developer to clean up the contamination on site. According to certification of contractors by the DOH**:**

Chapter 64.44 RCW

CONTAMINATED PROPERTIES

RCW 64.44.060

Certification of contractors, supervisors, or workers—Denial, suspension, revocation, or restrictions on certificate—Penalties—Fees.

A contractor, supervisor, or worker may not perform decontamination, demolition, or disposal work unless issued a certificate by the state department of health. The department shall establish performance standards for contractors, supervisors, and workers by rule in accordance with chapter 34.05 RCW, the administrative procedure act. The department shall train and test, or may approve courses to train and test, contractors, supervisors, and workers on the essential elements in assessing contaminated transient accommodations or property used as an illegal controlled substances manufacturing or storage site to determine hazard reduction measures needed, techniques for adequately reducing contaminants, use of personal protective equipment, methods for proper decontamination, demolition, removal, and disposal of contaminated property, and relevant federal and state regulations. Upon successful completion of the training, and after a background check, the contractor, supervisor, or worker shall be certified.

- The City should not make a decision on this Plan until all the toxic pollution information is documented and a remediation plan is approved by the Department of Ecology.

- Currently the developer is currently in litigation for improper management of toxins; Waste Action Project v. Snoqualmie Mill Ventures LLC. No plan should be considered nor approved until this lawsuit is settled. Snoqualmie Mill Ventures LLC are not trustworthy stewards of the environment.

- The Site is going to do massive grading. Protections for wetlands are compromised. Erosion control conditions are not strong enough for this site especially when considering the presence of toxic pollutants.

- The Plans conditions are so weak that there is a real risk of massive mudflows laden with toxic chemicals flowing into the Snoqualmie River and our groundwater with devastating consequences. This will risk the health and safety of local citizens, citizens downstream, rural farms and the Salish Sea.

- "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." (pg. 18 Staff Report)- Again this is a gross misrepresentation as the health of the Snoqualmie River is in danger as it stands today. Please see the link to the full article, excerpt below:

"Over the past two decades water temperatures in the Snoqualmie and Skykomish River basins has frequently exceeded temperature criteria established to protect Endangered Species Act-listed Chinook salmon, steelhead trout, and bull trout. These rivers combine in Monroe, WA to form the Snohomish River, the second largest producer of Chinook salmon in Puget Sound. The effects of high water temperatures on Chinook salmon populations are considered to have negatively affected the health of ESA-listed Southern Resident Orcas, which rely on Chinook salmon as their primary food source." (USGS, Washington Water Science Center)
https://www.usgs.gov/centers/washington-water-science-center/science/water-temperature-mapping-snoqualmie-and-skykomish

This also applies to "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." (pg. 22 of Staff Report) – An erroneous statement, such as, "If I throw chemicals in the river above the falls, it won't affect the water downstream."

- "The 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." (pg. 2 of Staff Report) – It is unacceptable to annex more

contaminated land to which the tax payers of the City of Snoqualmie will then be responsible for. Warehouse = truck traffic = pollution.

- "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." (pg. 19 Staff Report) -The preceding statement is an impossible assumption, especially if wine manufacturing occurs. This project will severely impact water availability and costs for all citizen's not to mention potentially affecting the health of available water.

- "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." (pg. 3 of Staff Report). – The EIS was inadequate as 90+ comments prove as such, many by environmental, traffic and wetlands professionals, The Snoqualmie Indian Tribe, and King County Agencies. The FEIS did not address a plethora of these comments, as required. Therefore, no PCI Plan should be approved until all issues and concerns regarding the EIS are addressed as the health and safety of citizens is at risk.
- "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." (pg. 22 Staff Report) -While this may be true, it will increase risks downstream, also increasing flooding downstream, affecting the health, safety and economic welfare of citizens of the lower Snoqualmie Valley.

- The PCI Plan references the EIS repeatedly and as stated above, the EIS was proven by professionally accredited responders to be inadequate. To state that all is well because the EIS says it is so is a gross misrepresentation of facts and can lead to the risk of citizen's health and safety.

- "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." (pg. 14) - The statement above is erroneous. A 70' building as proposed cannot be hidden, nor minimally visible. This project will be visible from the Snoqualmie Falls Park and the plan should not be approved as such, it will be an eyesore and a liability to the beauty of the Falls and the surrounding area,

- "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." (pg. 5 Staff Report) – There is a P Suffix that states all fill should be removed, this has not been done and is hidden in City website documents. According to text of Ordinance 12824:

https://kingcounty.gov/depts/local-services/permits/property-research-maps/property-specific-development-conditions/Psuffix/SnoqualmieValley/SV-P18.aspx

Description

Weyerhaeuser Mill

Development Condition Text

Weyerhaeuser Mill (Source: Snoqualmie Valley Community Plan and Area Zoning p.166)

I-P, M-P and RA-5-P, UR-P: These zoning designations recognize the Weyerhaeuser Mill in Snoqualmie as a resource-based industrial use. The mill is in the City of Snoqualmie Expansion Area 2, described on page 97 of the Snoqualmie Valley Community Plan. The RA-5-P, UR-P zoning is applied to land within the floodway. I-P, M-P zoning is applied to land outside the floodway. The following P-suffix conditions shall apply:

A._General

_1._Minimum 50' buffers on all property boundaries adjacent to residential areas.

_2._Joint planning between King County and the City of Snoqualmie is required for redevelopment of the mill site for uses other than forest products manufacturing pursuant to an interlocal agreement to be adopted by the City, the County and the property owner. The interlocal agreement shall provide for a review process under which:

__a._An application is submitted to both jurisdictions.

__b._The City shall provide its comments to the County.

__c._The County shall consider the City's comments and render a decision which it shall transmit to the City.

__d._The City shall approve or deny the County's decision in its entirety within 60 days, but may not modify its application to address those concerns. A modified application shall be subject to the review process outlined in paragraphs a-d.

_3._The City's review and approval or denial shall be governed by the following development standards. The interlocal agreement may elaborate upon these standards.

B._Public Services and Utilities

_1._The property owner shall pay its proportionate share of the capital cost of expansion of any city utility or service which is necessitated by the proposed development to ensure that burdens which would not otherwise occur will not be imposed on existing residents or facilities.

C._Compatibility

_As indicated in Policy SQP-79, the City and County recognize the historic industrial use and support continued industrial use of the property. Industrial use of the property other than forest product manufacturing should not be construed as a public nuisance per se were carried on in a reasonable manner and in compliance with any applicable regulations even though it may have impacts on nearby rural properties. Consideration shall be given to the existing rural, resource-related character of the City of Snoqualmie and to the nature and extent of impacts on surrounding properties.

D._Open Space

_A portion of the property shall be set aside for open space. Open space may include the floodway and trail along the Snoqualmie River.

E._Drainage Facilities

_1._A master drainage plan consistent with the criteria in the King County Surface Water Design Manual for the entire property shall be prepared.

_2._Surface water drainage control systems shall prevent the following unacceptable impacts:

__a._Aggravation of existing flooding problems;

__b._Destabilization of natural drainage systems;

__c._Unstable soil conditions; and

__d._Degradation of water quality in the Snoqualmie River.

F._Transportation

_1._A Transportation Plan shall be prepared which considers applicable City and County plans and policies.

_2._The property owner shall develop a Transportation Management Plan to minimize the necessity for single occupancy automobile usage. – (This has not been done.)

G._Sensitive Areas

_1._The old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and approved by the King County wetland biologist and Resource Planning Section staff.

_2._Bank restoration along the reach of the Snoqualmie River, if necessary, as a result of the proposed development.

_3._Public access along the Snoqualmie River and the southern portion of the old Mill Pond.

_4._The property owner will not oppose annexation if the proposed development requires extension of additional city services.

_5._P-suffix conditions apply to redevelopment of the mill site with other industrial uses, not forest product manufacturing.

_6._The rezone process may be used to modify the zone boundary based on additional information regarding the more precise location of the zero rise flood boundary.

Ordinance

12824

Effective Date

August 18, 1997

Changes

N/A

According to the linked Staff-Report-Appendix-B-Consideration-of-King-County-Zoning-P-Suffix-Conditions-PDF document below, "the old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and **approved by the King County wetland biologist and Resource Planning Section staff**."

"G._Sensitive Areas
_1._The old Mill Pond shall be restored to improve its habitat and water quality functions, including removal of sinker logs and fill. The restoration plan shall be reviewed and approved by the King County wetland biologist and Resource Planning Section staff." effective: August 18, 1997

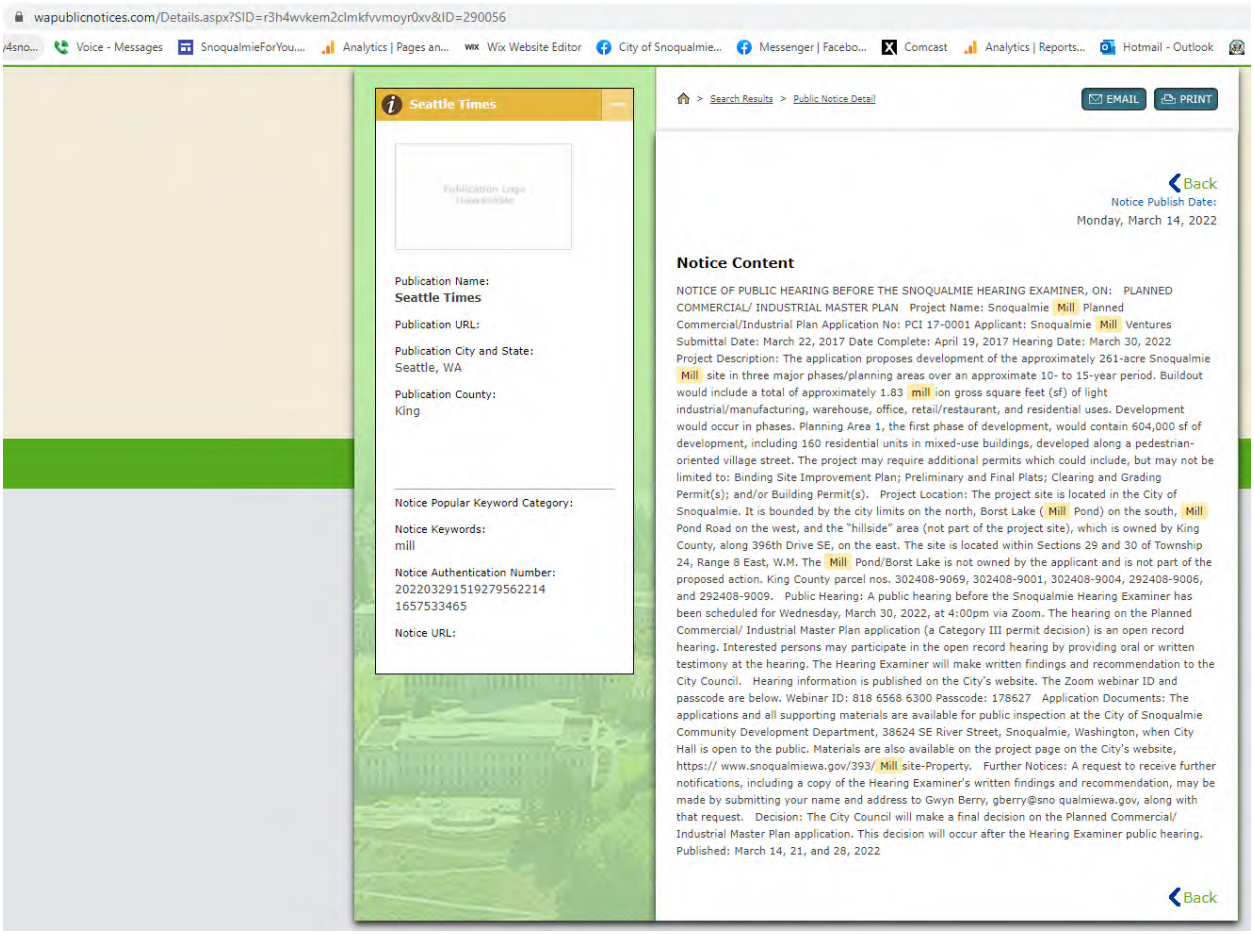
_____

- The Plan is a potential bait and switch. The Public is promised a lovely tourist district but there are no guarantees or requirements that this will actually occur. Once the Plan is approved the developer could totally change the uses on site. Will we get an Amazon warehouse instead of wine and cheese boutiques?

- The Public Hearing should be rescheduled or extended for several reasons:

1. A formal appeal has been filed in regards to the Final Environmental Impact Statement. No PCI Plan should be considered until the findings of the appeal have been made available to council and hearing examiner.

2. Mailed notices: ***affidavit*** of mailing is not on the website, mailing addresses are not correct, one 14 acre property owner was not on Exhibit D, which is not an affidavit of mailing (when mailed and who dropped it into the mail not there). Site addresses are described as mailing addresses (according to King County Assessor's database). All taxpayers and utility payers SHOULD be notified by mail for this public hearing because of the amount of city owned property within 500 feet of this historically large project for the region. The city council should expect to see the affidavit of mailing as part of the official record, if council members are doing their due diligence. Also, the ZOOM Link is very difficult to find.
3. Publication of the notice for the public hearing on March 14, 2022 and March 21, 2022 do not state the "place" of the hearing; instead, it refers to the city's website in general terms "Hearing information is published on the city's website". See screen shots below of published notices:



.

The published notice references https://www.snoqualmiewa.gov/393/Mill site-Property. From this part of the city's website, there is no information that contains the ZOOM link for the public hearing from this page of the city's website. Finding the link for some is extremely difficult, even for a resident familiar with the city's website.

RCW 35.02.040

Public hearing—Publication of notice.

Notice of the public hearing by the county legislative authority on the proposed incorporation shall be by one publication in not more than ten nor less than three days prior to the date set for said hearing in one or more newspapers of general circulation within the area proposed to be incorporated. Said notice shall contain the time and **place** of said hearing. Place in this instance is the ZOOM LINK, which is absent.

- In addition, the plan was endorsed by Katherine Ross when serving as council member. This endorsement is on video and can be produced if needed. Ross states her wish that

all council members support the project, as the city needs the money. This is a gross violation of her position at the time in a quasi-judicial matter.

- The existing PCI Plan puts the health, safety and welfare of the citizens of Snoqualmie and the lower valley at risk. It should not be approved.

- The time allotted to review the Snoqualmie Mill Staff report was inadequate. As such, I was only able to review the first 30 pages and felt I had to do this in an unorganized fashion. The community was not given ample notice, nor time to respond. I request this hearing be extended for that reason, and to include findings from the SEPA appeal and the existing lawsuit filed against Mill Ventures. The approach to notify the public was inadequate and the links and materials needed for response were difficult to find and conflicting. This may be a violation of the Open Government of Washington and follow up on this possibility will be addressed.

- I incorporate by reference in my comments the submittal of the Snoqualmie Community Action Network (SCAN) on March 30th, 2022.

Respectfully signed,

Cristie Coffing, resident
PO Box 24
Snoqualmie, Wa. 98065
imouttolunch@hotmail.com

Jason Rogers

From: Kenya Dillon <kenyarosedillon@icloud.com>
Sent: Wednesday, March 30, 2022 3:34 PM
To: Gwyn Berry
Subject: Mill Site Plan Application Public Hearing Comments

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

Hi Gwyn,

Please see my written comments for the Mill Site Plan Application Public Hearing below. Thank you.

Dear City of Snoqualmie Hearing Examiner and City Council,

Thank you for the opportunity to provide my comments on the proposed Snoqualmie Mill Site Plan Application. Asa lifelong resident I am deeply invested in the future of our community and gravely concerned about this application.

In addition to my personal comments below, I also incorporate by reference in my comments the submittals of the Snoqualmie Community Action Network (SCAN) on March 30, 2022.

I am shocked at how this development proposal has been handled thus far. Approving this project before thorough contamination testing has been completed, and without a remediation and clean up plan in place, shows a wanton disregard for the health and safety of not only our residents and community, but our Puget Sound area waterways.

The Mill Site is one of the most contaminated sites in the State of Washington. Environmental experts, scientists, and government agencies, including Washington Department of Ecology have expressed their concerns regarding high levels of contamination at the Mill Site.

On August 20, 2021 the State of Washington Department of Ecology published a Site Hazard Assessment for the Mill Site. This assessment ranks the Mill Site as among the worst sites in the state for hazards to human health and environmental health. The assessment found contaminated sediment in Borst Lake and groundwater and/or soil contamination in multiple areas. Several of the Site Hazard Assessment findings are of particular concern; the site scored 9 out of a possible 12 points for distance to the nearest fisheries resource, the Snoqualmie River; the potential of migration of contamination into surface water score was 21 out of a possible 24; and the human toxicity score was 12 out of 12. Additionally, the documented contamination in soil and groundwater containment score was 10 out of 10.

The site is located within the floodplain, near the Snoqualmie River, and it contains the former mill pond, Borst Lake, that flows into the Snoqualmie River. Disturbance of this site for development, without proper cleanup and remediation, poses a significant threat of contamination to the Snoqualmie River and all subsequent waterways in its path, including Puget Sound.

Water flows out of Borst Lake through an overflow channel and a culvert under Mill Pond Road into the Snoqualmie River, just one mile upstream of the Snoqualmie Falls. A weir is located in the overflow channel to control the water levels and flow out of Borst Lake. A Washington Department of Ecology Study from the 1990's found that due to erosion, water is flowing around the weir. Higher volumes of water are flowing from Borst

Lake into the Snoqualmie River, and eventually into Puget Sound. Any contaminants that are disturbed in the excavating process that can easily find their way into Borst Lake via surfacewater and groundwater movement will contaminate the Snoqualmie River and subsequent waterways in its path.

The City of Snoqualmie has failed to engage in extensive research defining the impacts of this development. They have chosen to default to old data, non-specific references, and minimal mitigation to the concerns raised by the community, community groups, and the Department of Ecology. The FEIS does not adequately address nor consider myriad concerns and questions within the Public and Agency Comments for Mill DEIS related to environmental health, site contamination and remediation of legacy contamination. The City of Snoqualmie openly concedes in FEIS Sections 3.6.1 and 3.6.4 (p. 3-61 and 3-64) that the FEIS does not adequately disclose the final, formal analysis and reporting related to critically important subsurface environmental analysis of Planning Area 1, pursuant to the minimum standards codified within Washington Administrative Codes, including but not limited to WAC 197-11-440, WAC 197-11-460 and WAC 197-11-560.

What should be our gravest concern is that the documented PCBs (polychlorinated biphenyls) - highly toxic pollutants, present in the Mill Site, will, through the process of excavation and construction, end up in our waterways and/or groundwater, creating a public health crisis for residents and wildlife, as well as numerous downstream communities from Fall City all the way to the Puget Sound. Without a clean up and remediation plan in place, the risk of PCB contamination is severe.

Why should you care about PCB contamination?

In April 1990, following a fire at the Mill Site, the U.S. Environmental Protection Agency (EPA) produced a report titled "Snoqualmie Mill Plywood Plant Fire Site, Former Transformer Locations T-12 and T-17: Cleanup Summaries, Risk Assessment and Site Hazard Ranking Report." In this report, the EPA explained PCB contamination and its effects on humans:

> PCBs may be transported and partitioned by air, soil, water, aquatic sediments, and biota. The low water solubility and low volatility of PCBs indicate that they are partitioned most heavily into the organic fraction of soil, sediments, airborne particulate, and biological tissues. Major pathways of human exposure are ingestion of soils, inhalation of dust, direct contact with sediments or soils, and ingestion of bottom- feeding or bottom-dwelling aquatic organisms that accumulate PCBs through contact with contaminated sediments or ingestion of contaminated prey (Kimbrough, 1980). Once absorbed, PCBs are initially concentrated in the liver, blood, and muscle tissues. Long-term storage is in the skin and adipose tissue (Safe, 1980). Because PCBs are fat soluble and poorly metabolized, they have entered the food chain and accumulated in the adipose tissues of fish, birds, and mammals, including humans.
>
> An incident in Japan documented approximately 2,000 Japanese people that experienced lesions of the skin, facial swelling, and neurological disorders. The individuals with the highest dosages had nausea, lassitude, anorexia, impotence, and hematuria. The severity of symptoms were directiy related to the quantities of PCBs ingested. Placental transfer of PCBs had occurred in pregnant women and had adversely affected the fetuses. The toxic effects noted were similar to those reported in animal studies (U.S. EPA, 1986).
>
> Since PCBs tend to be concentrated and metabolized in the liver, and redistributed to skin and adipose tissues for long-term storage, large exposures or repeated chronic exposures to PCBs may have profound long-term toxic effects. Hepatoxicity and dermal skin lesions are major manifestations of PCB poisoning.

The EPA also found levels of chlorobenzenes. Exposure "may cause eye irritation, respiratory irritation, and aplastic anemia. Acute exposure may cause drowsiness, incoordination, and unconsciousness. Chronic exposure may result in liver, kidney and lung damage as indicated by animal experiments (U.S.EPA, 1984)."

There are four ways in which people and animals can come into contact with hazardous waster from uncontrolled sites: 1) groundwater, 2) surface water, 3) air, and 4) solids (i.e. soil, sediments, sludge, and actual wastes) (U.S. E.P.A. *Snoqualmie Mill Plywood Plant Fire Site, Former Transformer Locations T-12 and T-17: Cleanup Summaries, Risk Assessment and Site Hazard Ranking Report,* Section 3.4.1, 1990). In their report, the EPA notes that

the contaminates at the specific transformer sites studied after the fire, direct contact with the contaminated soil and sediments are not a concern since they were buried at the time.

This will not be the case when excavation of the site occurs. Excavation and construction of the Millsite has significant potential to unearth and release these toxic contaminants that have remained buried in the soil and sediment. Why would we as a City allow excavation and construction to begin without a proper contamination study and clean up plan in place?

The cover page memo (stamped June 8, 1990) of the EPA's report states the following:

> Attached is a copy of the PCB Spill Cleanup Report for Weyerhaeuser Plywood Plant in Snoqualmie, Washington, for your information. The facility had a PCB spill as a result of a fire that occurred on February 7, 1989.
>
> The facility states it is unable to clean the site identified in the report as T-12 to the numerical standards specified by the PCB Spill Cleanup Policy, because further remediation could result in groundwater contamination. The PCB concentrations remaining in the soil range from 33ppm to 34,000ppm.

This is the level of PCB contamination in 1989. Further clean up could not be completed in 1990 because it could result in groundwater contamination. According to the EPA, PCB's may degrade naturally over time through the process of natural dechlorination, but they never become harmless and they never go away. All PCBs, regardless of their level of chlorination, are harmful to human health. The Mill Site is so contaminated with PCBs that proper cleanup could not even be completed due to the potential for groundwater contamination. Where does that groundwater go? To the Snoqualmie River, where it meets the Skykomish river to become the Snohomish River, and eventually flowing in Port Gardner Bay in Puget Sound. If you allow this project to move forward and excavation to begin before a full site clean up has taken place, you are opening the gates for potential PCB contamination not only in the Snoqualmie River and Snoqualmie Valley, but all the way to the Puget Sound.

The assessments in the EPA report are from 1990. These are red flags, warnings we should heed that the Mill Site has a legacy of contamination. Warnings from as far back as 1990 that excavating and disturbing the Mill Site without proper clean up and remediation will result in PCB contamination. PCBs are carcinogens. This project has the potential to release carcinogens and yet the City is ready for you to approve it without adequate environmental studies and clean up.

If this project is approved without an extensive environmental contamination study and clean up and remediation plan in place, then the responsibility for PCB contamination lies with the City of Snoqualmie and the City Council.

You as the Hearing Examiner and the City Council are the gatekeepers to protect our community. The Hearing Examiner and the City Council are the mechanisms to ensure that the City of Snoqualmie prioritizes the health and safety or its residents. It is critical to our health and safety that the City of Snoqualmie engages in the necessary environmental research and requires a cleanup and remediation plan before allowing this development application to proceed. It is your responsibility to place public safety over profit. Failure to require an extensive environmental contamination study and clean up plan before any excavation occurs is reckless and irresponsible. Approval of this project at this stage would be a blatant disregard for the healthy and safety of Snoqualmie Valley residents and our waterways.

Protect our health and safety and our waterways by requiring due diligence before allowing this application to proceed.

Thank you,

Kenya Dillon

Jason Rogers

From: Peggy Shepard <peggyshepard@comcast.net>
Sent: Wednesday, March 30, 2022 3:35 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan
Attachments: Peggy Shepard Comments 2022 03 30.docx

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

Hi Gwyn,

Please see the attached for my comments for tonight's meeting.

Thanks,

Peggy Shepard
6701 W Crestview Loop SE
Snoqualmie, WA 98065
(925) 519-5415

Argument against phasing environmental study 2
Abuse of Piecemealed Environmental Impact Studies 9
Deadlines in WAC 197-11-460 10
Waste Action Project v. Snoqualmie Mill Ventures LLC - Industrial 12
Snoqualmie Mill – Fill Excavation? 15
Lawsuit over Berm and Fill Removal 18
Due Process? 20
Area of Contamination map from WA DOE 27
GMA - Snoqualmie 28
Weyerhaeuser 30
Snoqualmie Mill Issues - wellhead protection, in 1 year time of travel 36
Expired Water System Plan 41
Misleading FEIS Statement: Targets … are not a Cap 42
Not enough water for the Mill Site 46
Water Right Application No. G1-27589 47
Reference All Mill Plan Documents in the Official Record 49

Argument against phasing environmental study

FEIS: "The City is utilizing a phased environmental review for the PCI Plan and subsequent development, pursuant to the SEPA Rules (Washington Administrative Code *[WAC] 197-11- 060(5))*"

Response:

*WAC 197-11- 060(5)**also** states:*

(d) ***Phased review is not appropriate when***:

(i) The sequence is from a narrow project document to a broad policy document;

(ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or

(iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060 (3)(b) or 197-11-305(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.

(g) Where proposals are related to a large existing or planned network, such as highways, streets, pipelines, or utility lines or systems, the lead agency may analyze in detail the overall network as the present proposal or may select some of the future elements for present detailed consideration. Any phased review shall be logical in relation to the design of the overall system or network, and shall be consistent with this section and WAC 197-11-070

Department of Ecology Site Hazard Assessment released in August 2021, after the Draft EIS comment period closed, and before the Final EIS was released. It is addressed in the FEIS, but was not available to be commented on before comment period was closed for the DEIS. It should not be considered as reviewed as the DEIS was. The Site Hazard Assessment is clearly a good reason to NOT generate the FEIS in phases. The Site Hazard Assessment clearly identifies Borst Lake as part of the contamination to be managed as one cleanup site.

"Following a review of available information as part of the SHA [Site Hazard Assessment], ***Ecology determined that all contamination related to the mill facility is best managed as one cleanup site***"

"Ecology home > Toxics Cleanup > Sites > Weyerhaeuser Snoqualmie Mill
Weyerhaeuser Snoqualmie Mill
38800 SE Mill Pond Rd, Snoqualmie, WA 98065
In August 2021, Ecology completed a Site Hazard Assessment and the Site was added to the Hazardous Sites List. The Site Hazard Assessment included assigning a ***numerical rank of 1 to the Site*** [in the state] using the Washington Ranking System (WARM). WARM ranks assign a numerical score to a Site's potential threat to human health and the environment, relative to other ranked sites in Washington State. Ranks range between 1 and 5, ***where 1 represents the highest potential threat*** and 5 represents the lowest potential threat."

The original Mill site (including Mill Pond aka Borst Lake) has flood and contamination concerns documented in the City of Snoqualmie Comprehensive Plan. All phases of the proposed development and more are contiguous and impacted by the original source of flood and contamination – the Weyerhaeuser Mill. "Mill property pre-annexation agreement requires removal of floodplain fill as part of future development" The Pre-Annexation Agreement should be made part of the Final EIS; and the EIS should not be done in phases and Borst Lake should be made part of the environmental study.

The Comprehensive plan states:

"Mill Site Berm & Fill To protect the former mill site, Weyerhaeuser constructed a berm along Mill Pond Road with fill later added behind the berm, some without the proper permits; about ***93,900 cubic yards of fill were added to the floodplain***. The King County Flood Hazard Reduction Plan ***identified*** the berm ***as a hazard*** that displaced floodwater, potentially impacting conveyance & storage capacity. Weyerhaeuser was issued a permit in 2006 by King County to remove about 49,000 cubic yards of the fill; the berm was breached and most of it removed [was this confirmed?]. The City pursued an action against the County to compel removal of remaining fill. The County prevailed. ***The Mill property pre-annexation agreement requires removal of floodplain fill as part of future development***."

"E.3 MILL PLANNING AREA The primary land use in this area from 1917 to 2003 was the Weyerhaeuser Mill, though due to the constraints of its partial floodplain location, continued heavy industry uses are not appropriate for the area. A large portion of this area was annexed in 2012, subject to a pre-annexation agreement."

"Large portions in floodway/floodplain, with areas of ***prior unpermitted fill***"

"Areas of potential soil contamination due to former lumber mill activities. "

"6. Large segment of Snoqualmie River frontage.

7. Large Class I wetland –Borst Lake, or the former mill pond"

"***Location of City's north well field***." [see 2013 Water System Plan]

"Aside from Mill site flood impacts, one concern that has been raised for the area is possible remaining soil contamination from previous mill operations. Weyerhaeuser conducted a number of site assessments for contaminants in 1993 and 2004, which were followed by several voluntary clean-ups, some of which were completed pursuant to a 2006 King County clearing and grading permit. Department of Ecology records show the ***former lumber mill site is awaiting a Site Hazard Assessment***; a "no further action" letter from DOE was not obtained for the site, reportedly due to legal costs. Overall, the site is a

brownfield or, “an abandoned, idle or under-used real property.” Such designation means the site may qualify for various brownfield grants.”

The 2013 Water System Plan doesn’t delineate projections for the Mill site. It does mention contamination concerns emanating from the original Mill site as a whole and identifies deficiencies in terms of water rights based on actual use through 2010.

The 2013 Water System Plan states:

“As shown in Table 3-11, the City exceeded its instantaneous water rights at the North Wellfield and South Wellfield during peak times in 2010.” *[without growth projections]*

“It is projected that the City will have adequate source capacity to meet demands until ***2027*** assuming no raw water is diverted to the Class A system. Additional instantaneous source capacity will be required to meet projected maximum day demands in ***2023***.

Developing the well claim sources will prolong the need for new rights and source
capacity to beyond the 20-year planning period [2032].”

The industrial plant located northeast of Snoqualmie, once a mill owned by Weyerhaeuser, is now owned by Snoqualmie Mill Ventures, LLC and houses Dirtfish Rally School.

When the mill was owned and operated by Weyerhaeuser, the system included water rights from Tokul Creek for 6,732 gpm instantaneous withdrawal and 10,860 acre-ft/year, two 850-gpm pumps, and two 250,000-gallon reservoirs, plus a small treatment plant.

The ***fire protection system***, which supplies fire hydrants and sprinkler systems in the buildings, is supplied from a 1,250-gpm pump station, which draws from the ***log pond*** *[aka Borst Lake – no plan to study Borst Lake]*

Weyerhaeuser has relinquished the water rights back into the State Trust and has an application in for a new groundwater right, in anticipation of either using the mill again or redevelopment to residential and commercial uses. Potable water is provided by the City *[for a small office building]*. Without the Tokul Creek water right, ***fire flow is not available to the site*** and the system is no longer considered an adjacent purveyor since ***there is no valid source***.

TABLE 6-1 ***North Wellfield Potential Contaminant Sources***
5-Year Zone of Contribution

38800 SE Millpond Road/ 7001 396th Drive SE	LUST	Weyerhaeuser Mill/ Dirtfish Rally School

38800 SE Millpond Road/ 7001 396th Drive SE	UST	Weyerhaeuser Mill/ Dirtfish Rally School
38800 SE Millpond Road/ 7001 396th Drive SE	CSCS	Weyerhaeuser Mill/ Dirtfish Rally Schoo

UST = Underground Storage Tank, LUST = Leaking Underground Storage Tank, RCRA = Dangerous Waste and Materials Generators which are regulated by Ecology under RCRA, and CSCS = Confirmed or Suspected Contaminated Sites.

"Underground storage tanks (USTs) and leaking underground storage tanks (LUSTs) can be a major threat to groundwater quality. Petroleum products that may contain impurities that are mobile in the groundwater system are the most commonly stored substances in USTs. The EPA estimates that 35 percent of all USTs may be leaking."

"The mill site has underground storage tanks located within the 5-year zone of contribution…"

"There are confirmed and suspected contaminated sites ***within the wellhead protection area of the City's North Wellfield***. These sites are located at the Snoqualmie Mill site and the Weyerhaeuser Mill along the eastern and western boundaries of the 5-year zone of contribution."

"INVENTORY DATA SOURCES
The above inventory of potential contaminant sources was compiled using various data sources. Agencies such as Ecology and EPA maintain contaminant databases that list businesses that handle and store potential contaminants. The following databases were used to create the inventory for the City of Snoqualmie's wellhead protection area:

- Underground Storage Tank Report, April 2011. This version of the Underground Storage Tanks Report was obtained from Ecology's Toxics Cleanup Program. This list was used to locate the facilities that contain underground storage tanks and verifies facilities located by field surveys in the wellhead protection areas.

- Leaking Underground Storage Tank Report, April 2011. This version of the Leaking Underground Storage Tank (LUST) Report was also obtained from the Ecology Toxics Cleanup Program. The LUST report lists the site name, address, age, volume, and status of sites that contain leaking underground storage tanks.

- Dangerous Waste and Materials Generators. The EPA's RCRA program has been taken over by Ecology within the State of Washington and is regulated under the Dangerous Waste Regulations (173-303 WAC).

- Title III Facilities. Title III facilities are identified as those facilities that generate, treat, store, or dispose of hazardous materials in sufficient quantity to pose a threat to the community. There are several different types of Title III facilities depending upon the quantity and the nature of the material handled. All companies that are designated as Title III facilities must report to the County on an annual basis. This reporting was a result of the 1986 Superfund Amendments and Reauthorization Act. Title III of the act was subsequently renamed to the Emergency Planning and Community Right to Know Act (EPCRA).

- Confirmed and Suspected Contaminated Sites Report, May 2011. Ecology maintains the Confirmed and Suspected Contamination Sites Report. The list is updated as new information becomes available. Each site is given a site status code indicating the status of the cleanup process."

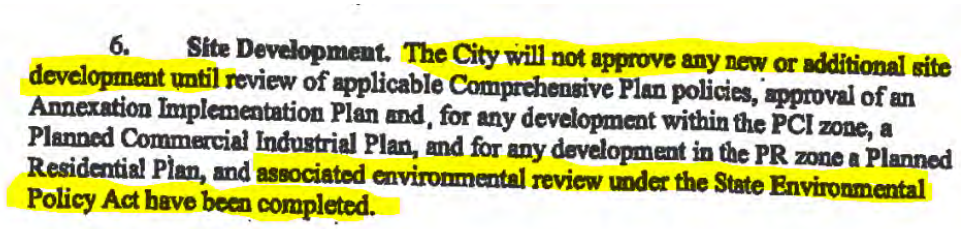
Snoqualmie Mill PCI Plan Final EIS projections of extensive traffic impacts, failing the city's requirement to maintain LOS D or better.

"WAC 197-11- 060(5)
(g) ***Where proposals are related to a large existing or planned network, such as highways, streets, pipelines, or utility lines or systems***…"

This impact goes much farther than the vicinity of the project, it impacts everyone in Snoqualmie and other jurisdictions. This environmental study must be made part of a USPS mailing to the entire city. This proposal will cause six intersections to fail, so extensive work will be required to accommodate the traffic for this proposal. We also need to know what the costs will be to make these changes, what infrastructure under the roads will be impacted?

"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. • Based on updated information from WSDOT and delays associated with the pandemic, the planned improvement to the I-90 interchange is not expected to be completed until 2025. • Construction of Planning Area 1 is planned to be completed in 2023, and the project's traffic would contribute 100 AM peak hour trips. This intersection currently operates at LOS F in the AM peak hour; therefore, Planning Area 1 would add to existing congestion for a limited period, until the improvement is completed. This impact is considered unavoidable"
	Mill Property pre-annexation agreement https://mrsc.org/getmedia/7B7C7EE7-4A4D-4C78-AAD8-59A1D25B8CE2/s63r1144.aspx  6. Site Development. The City will not approve any new or additional site development until review of applicable Comprehensive Plan policies, approval of an Annexation Implementation Plan and, for any development within the PCI zone, a Planned Commercial Industrial Plan, and for any development in the PR zone a Planned Residential Plan, and associated environmental review under the State Environmental Policy Act have been completed. http://snoqualmiemill.com/wp-content/uploads/2017/05/Staff-Report-APPENDIX-A-Element-8-Policy-Review.pdf

Abuse of Piecemealed Environmental Impact Studies

https://digitalcommons.law.seattleu.edu/cgi/viewcontent.cgi?article=1715&context=sulr

Seattle University Law Article - The Gap Between Informational Goals and the Duty to Gather Information: Challenging Piecemealed
Review under the Washington State Environmental Policy Act

The FEIS is being done in pieces, this article describes how this practice is abused and how to challenge it.

Deadlines in WAC 197-11-460

Deadlines in WAC 197-11-460 [Issuance of FEIS] paragraph (6) recognizes timing extension for complexity:

"(6) The lead agency shall issue the FEIS within sixty days of the end of the comment period for the DEIS, unless the proposal is unusually large in scope, the environmental impact associated with the proposal is unusually complex, or extensive modifications are required to respond to public comments."

The DEIS comment period ended June 5, 2020, FEIS was issued December 9, 2021, **552 days** instead of 60, or 9 times 60 days.

This is a very complex proposal that is unusually large in scope that took a long time for the FEIS to be issued, and the time that the FEIS was issued was a during a busy holiday season that started the clock to file an appeal.

In the spirit of WAC 197-11-460, since the amount of time to issue an FEIS was allowed to be extended; we are asking for a comparable extension to the deadline to file an appeal.

I request that the 14 day deadline be allowed by 9 times the number of days to respond; for a total of 126 days (14 X 9).

It is only fair that both sides be given the same consideration.

WAC 197-11-460

Issuance of FEIS.

(1) A final EIS (FEIS) shall be issued by the responsible official and sent to the department of ecology (2 copies), to all agencies with jurisdiction, to all agencies who commented on the DEIS, and to anyone requesting a copy of the FEIS. (Fees may be charged for the FEIS, see WAC 197-11-504.)
(2) The responsible official shall send the FEIS, or a notice that the FEIS is available, to anyone who commented on the DEIS and to those who received but did not comment on the DEIS. If the agency receives petitions from a specific group or organization, a notice or EIS may be sent to the group and not to each petitioner. Failure to notify any individual under this subsection shall not affect the legal validity of an agency's SEPA compliance.
(3) The lead agency should make additional copies available in its offices for review.
(4) The date of issue is the date the FEIS, or notice of availability, is sent to the persons and agencies specified in the preceding subsections and the FEIS is publicly

available. Copies sent to the department of ecology shall satisfy the statutory requirement of availability to the governor and to the ecological commission.
(5) Agencies shall not act on a proposal for which an EIS has been required prior to seven days after issuance of the FEIS.
(6) The lead agency shall issue the FEIS within sixty days of the end of the comment period for the DEIS, unless the proposal is unusually large in scope, the environmental impact associated with the proposal is unusually complex, or extensive modifications are required to respond to public comments.
(7) The form and content of the FEIS is specified in WAC 197-11-560.

Waste Action Project v. Snoqualmie Mill Ventures LLC - Industrial

I am concerned about the contamination https://apps.ecology.wa.gov/cleanupsearch/document/104498 where there is a plan to develop the millsite in Snoqualmie https://www.snoqualmiewa.gov/393/Mill-Property.

https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=10346 states

> "Ecology has not been directly involved in cleanup activities, but has been involved in permitting related to current property use. Ecology's Water Quality Program issued industrial stormwater permit #WAR310172 on April 26, 2021, which covers part of the Site. The permit expires on December 31, 2024."

The permit was issued April 26, 2021, one year after the millsite completed a draft environmental impact study https://www.snoqualmiewa.gov/DocumentCenter/View/30876/Notice-of-Mill-DEIS-Availability_04-27-2020-Seattle-Times-PDF

https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?id=367529 is Request for Coverage, Industrial Stormwater General Permit Application Id: 35337

page 1 -
Permittee: Tom Sroufe, Site Contact: Mac McInnis

page 3 -

Public Notice applies to facilities that began operations on or after January 1, 2020.

You must publish a public notice at least **once** a week for **two** consecutive weeks with **seven days** between publications, in at least a **single** newspaper of general circulation in the county in which the facility is located. E cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the da **second** public notice.

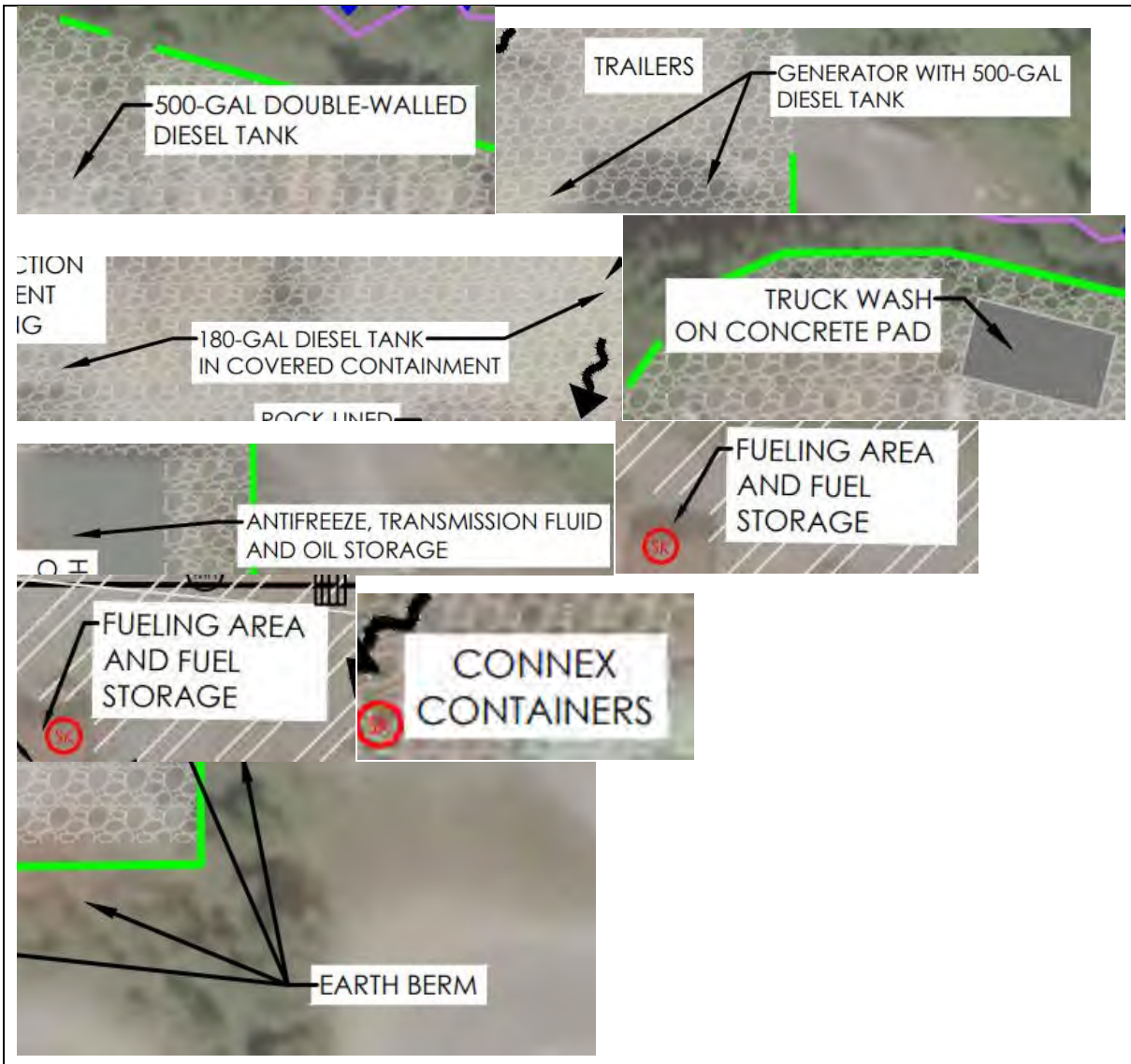
Newspaper Name	First Public Notice Date	Second Public Notice Dat
Seattle - The Seattle Times	3/25/2021	4/1/2021

Using www.wapublicnotices.com, there are no results for this permit for either date for the Seattle Times.

The application does not have a signature.

https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?id=360999

Is a map of the northeast part of the millsite, which shows



The berm and fill have been documented in a lawsuit that they were done without permits. https://www.valleyrecord.com/news/snoqualmie-appeals-berm-decision/, and according to the City of Snoqualmie's comprehensive plan there's a pre-annexation agreement that requires removal of floodplain fill as part of future development.

https://www.snoqualmiewa.gov/DocumentCenter/View/1384/Comprehensive-Plan-Adopted-2014-Element-7-Land-Use-PDF
page 14

> "Mill Site Berm & Fill: To protect the former mill site, Weyerhaeuser constructed a berm along Mill Pond Road with fill later added behind the berm, some without the proper permits; about 93,900 cubic yards of fill were added to the floodplain. The King County Flood Hazard Reduction Plan identified the berm as a hazard that displaced floodwater, potentially impacting conveyance & storage capacity. Weyerhaeuser was issued a permit in 2006 by King County to remove about 49,000 cubic yards of the fill; the berm was breached and most of it

removed. The City pursued an action against the County to compel removal of remaining fill. The County prevailed. The Mill property pre-annexation agreement requires removal of floodplain fill as part of future development."

https://casetext.com/case/waste-action-project-v-snoqualmie-mill-ventures-llc

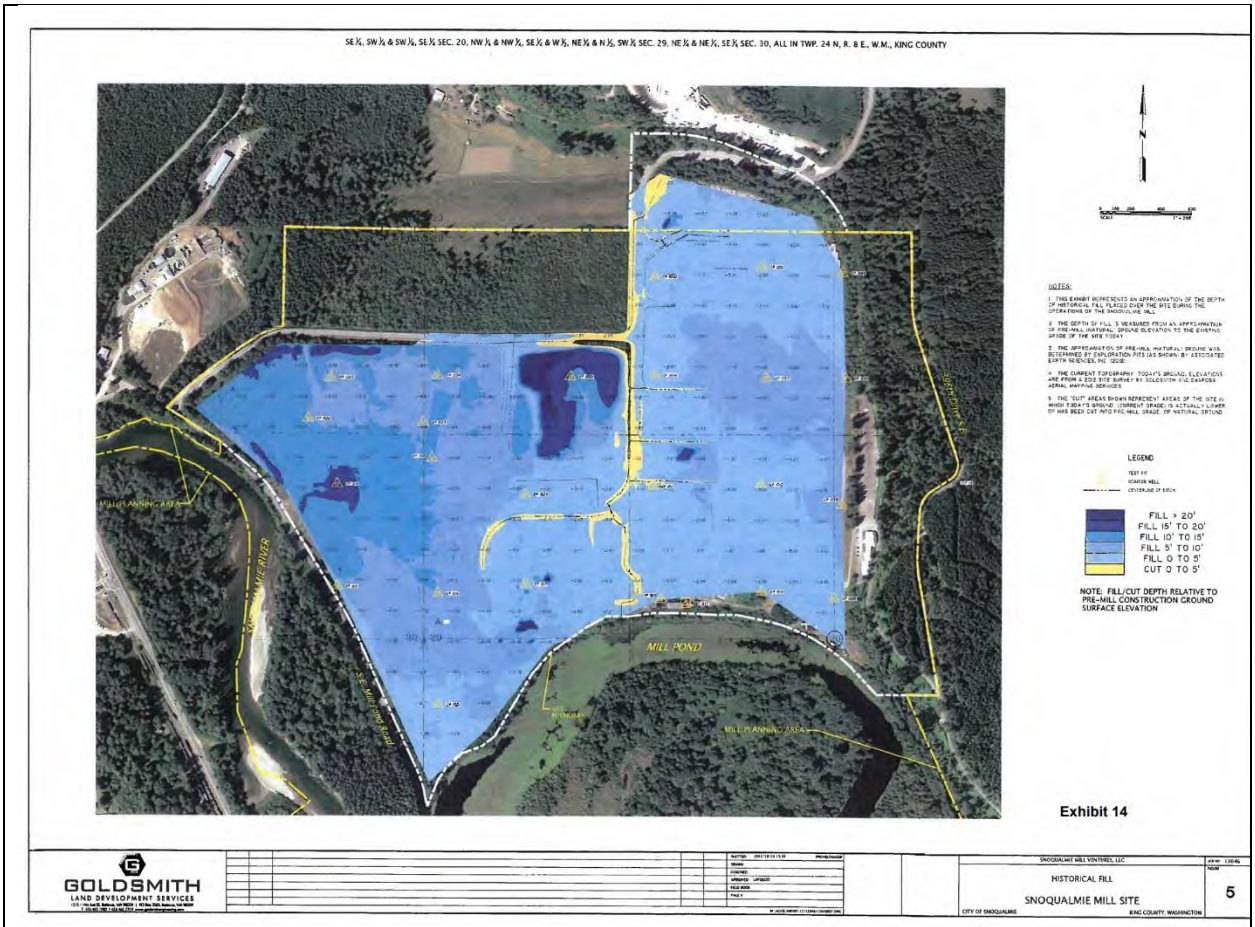
Snoqualmie Mill – Fill Excavation?

Snoqualmie Mill
Final Comment Lette

I am seeing a reference to the Mill property pre-annexation agreement in the city's comprehensive plan https://www.snoqualmiewa.gov/DocumentCenter/View/1384/Comprehensive-Plan-Adopted-2014-Element-7-Land-Use-PDF to remove about 49,000 cubic yards of the fill:

> "Mill Site Berm & Fill To protect the former mill site, Weyerhaeuser constructed a berm along Mill Pond Road with fill later added behind the berm, some without the proper permits; about 93,900 cubic yards of fill were added to the floodplain. The King County Flood Hazard Reduction Plan identified the berm as a hazard that displaced floodwater, potentially impacting conveyance & storage capacity. Weyerhaeuser was issued a permit in 2006 by King County to remove about 49,000 cubic yards of the fill; the berm was breached and most of it removed. The City pursued an action against the County to compel removal of remaining fill. The County prevailed. The Mill property pre-annexation agreement requires removal of floodplain fill as part of future development."

https://www.snoqualmiewa.gov/DocumentCenter/View/1443/Exhibit-14-Fill-Map-PDF



https://www.valleyrecord.com/news/berm-case-heads-to-king-county-superior-court/
Berm case heads to King County Superior Court

https://www.seattletimes.com/seattle-news/snoqualmie-at-odds-over-environmental-review-of-mill-site/
Snoqualmie at odds over environmental review of mill site

https://www.snoqualmiewa.gov/DocumentCenter/View/3602/Delta-Environmental-Consultant-Supplemental-Environmental-Site-Assessment---Lumber-Strapping-and-Dip

Estimated Remedial Excavation Extent and Volumes

Delta estimates that approximately 770 cubic yards of soil will need to be excavated to remove the TPH-impacted soil which has impacted groundwater in the lumber strapping area. The estimate is based on the laboratory data, field screening observations and preliminary MTCA Method B cleanup levels for unrestricted land use (3,600 mg/kg diesel and 3,200 mg/kg heavy oil calculated by EMCON, Inc. for TPH impacts at the Snoqualmie Mill[1]). The EMCON calculated cleanup levels were used to estimate the general magnitude of remedial excavation activities for the lumber strapping area. Those values should be updated before initiating any remedial action. The estimated footprint for the proposed excavation is presented on Figure 3. The estimated depth of the excavation is anticipated to be eight feet bgs. Boring logs summarizing the field observations are included as Attachment B.

Lawsuit over Berm and Fill Removal

"In 1999 The City hired Geologics, Inc. to analyze the quantity of fill from the placement of the Mill Pond Road berm and sort yard fill behind the berm. The City filed a code enforcement complaint with King County for unlawful filling, primarily the Mill Pond Road berm, and pursued it vigorously between 1999 and 2002, when a Hearing Examiner dismissed the City's complaint on the basis that it would require retroactive application of codes enacted after the events. "

"Require removal of the floodway and floodplain encroachment (fill) as a condition of annexation to assure restoration of the pre-fill floodplain functions"

https://www.valleyrecord.com/news/old-mill-new-visions-stakeholders-city-weigh-past-impacts-future-role-in-annex-debate/

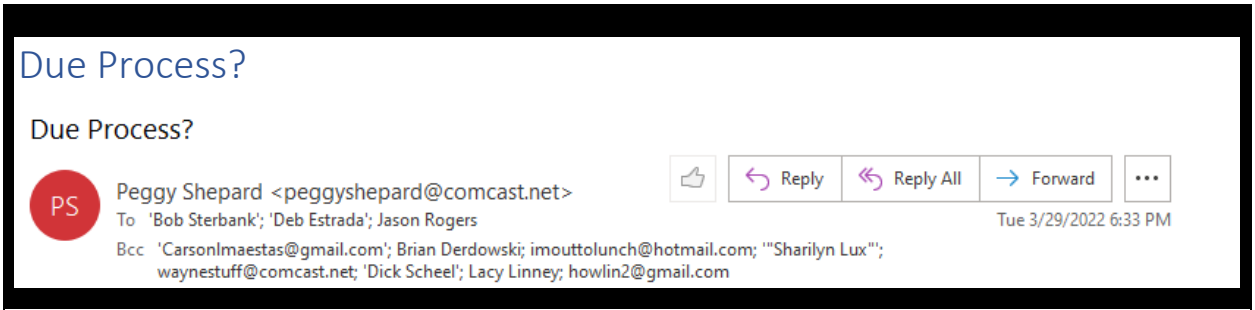
"Wendy Thomas, a Snoqualmie business owner and member of the city's Economic Development Commission, tried to make flood protection a part of the discussion at last month's commission meeting. She suggested that the city consider removing fill dirt and the protective berm from around the mill site, to restore part of the Snoqualmie River's floodplain.

"To me, you have this opportunity to have this tremendous flood storage, that somebody thought was important enough to include in the comp plan," she said."

"Thousands of yards of mud were removed from the oxbow to create the lake. Tons of rock were sunk to create a sort yard, and mud was scraped to create a huge earth berm alongside Mill Pond Road that would keep flood waters on the mill site from sending timber downriver."

https://www.snoqualmiewa.gov/DocumentCenter/View/15803/City-Council-Minutes-03-24-2003-PDF?bidId=
March 24,2003 City Council Meeting
Firiniice and Administrative Services Coiiiiiiittee (Marcia Koricli. Cliair - Matt Lursori, MeniherJ
AB#03-032 Authorize or ratify the filing of a Superior Court appeal of the King County Hearing Examiner decision to dismiss the city's case regarding the Weyerhaeuser Berm and Sort Yard fill
The city made a complaint to King County DDES regarding the Weyerhaeuser berm and sort yard fill. DDES elected not to take enforcement action. The city appealed the decision to the King County Hearing Examiner. The Hearing Examiner made the decision to dismiss the cities appeal. This would authorize Superior Court review of the King County Hearing Examiner decision to dismiss.
*The actual cost of this action is undetermined. The Council did authorize the

expenditure of up to $25,000 to appeal the berm and sort yard fill issue. There is $58,000 currently budgeted in the general legal budget. It is likely that this fund will be over the budgeted amount, and could require a budget amendment at the end of the year.
MOVE by Marcia Korich, second by Dick Kirby to ratify the filing of a Superior Court appeal of the King County Hearing Examiner decision to dismiss the city's case regarding the Weyerhaeuser Berm and Sort Yard fill. Discussion. Motion carried 4 to 0.



Please start the public notice process over for the Public Hearing, there has been insufficient notice. I have people from Next Door asking who to contact and as I started to find where it is on the city's website I noticed that the notices published in the Seattle Times don't include a ZOOM link but give the non-specific direction that it is on the city's website (somewhere?), but nothing as to where on the website to find the link for the public hearing.

Two concerns:

1) ZOOM link is very hard to find if you don't just know where to look, and

2) Mailed notices: *affidavit* of mailing is not on the website, mailing addresses are not correct, one 14 acre property owner was not on Exhibit D, which is not an affidavit of mailing (when mailed and who dropped it into the mail not there). Site addresses are described as mailing addresses (according to King County Assessor's database). All taxpayers and utility payers SHOULD be notified by mail for this public hearing because of how much city owned property is within 500 feet of this historically large project for the region. The city council should expect to see the affidavit of mailing

as part of the official record, if council members are doing their due diligence.

Concern 1) – ZOOM link is very hard to find

A ZOOM hearing WITHOUT a zoom link?

Publication of the notice for the public hearing on March 14, 2022 and March 21, 2022 do not state the "place" of the hearing; instead it refers to the city's website in general terms "Hearing information is published on the city's website". See screen shots below of published notices.

The published notice references https://www.snoqualmiewa.gov/393/Mill site-Property

From this part of the city's website, there is no information that contains the ZOOM link for the public hearing from this page of the city's website. Finding the link for some becomes a Where's Waldo exercise if a resident is not familiar with the city's website.

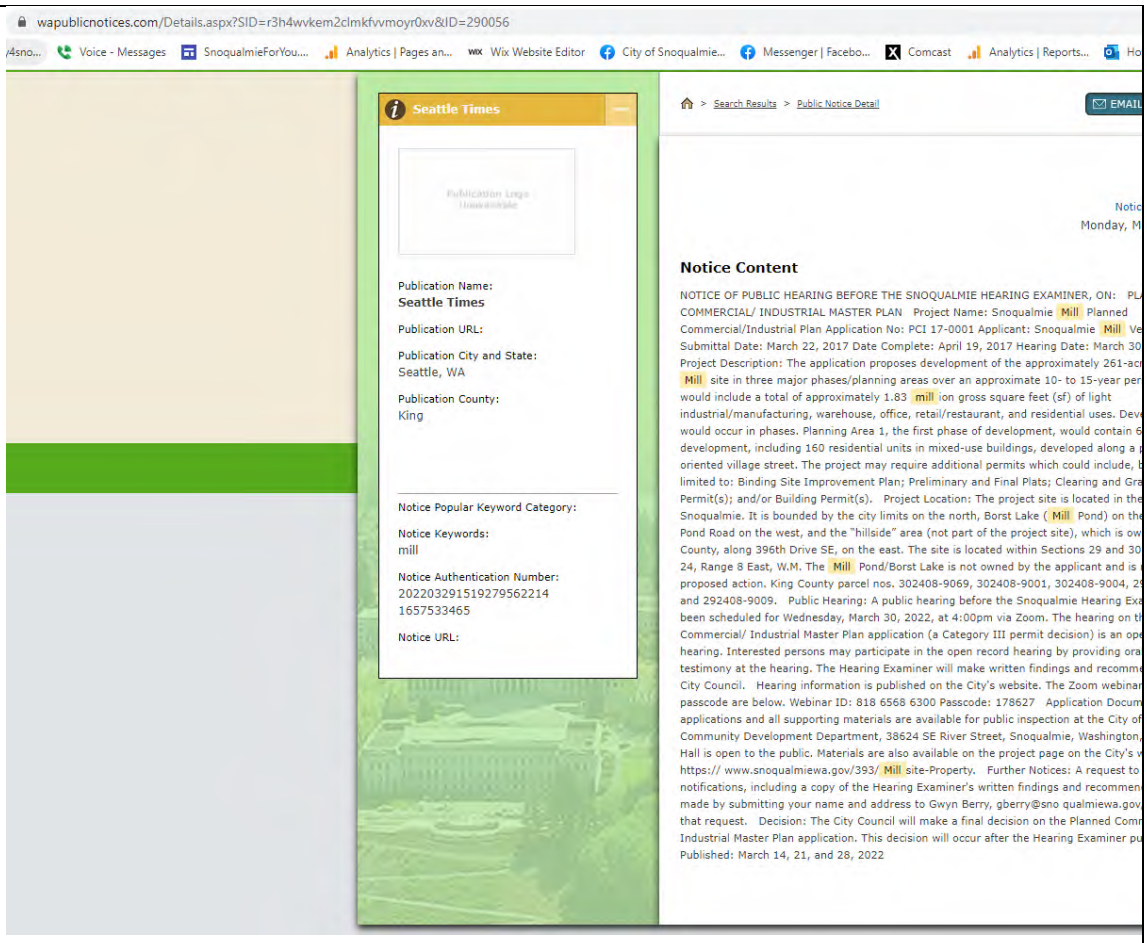
RCW 35.02.040

Public hearing—Publication of notice.

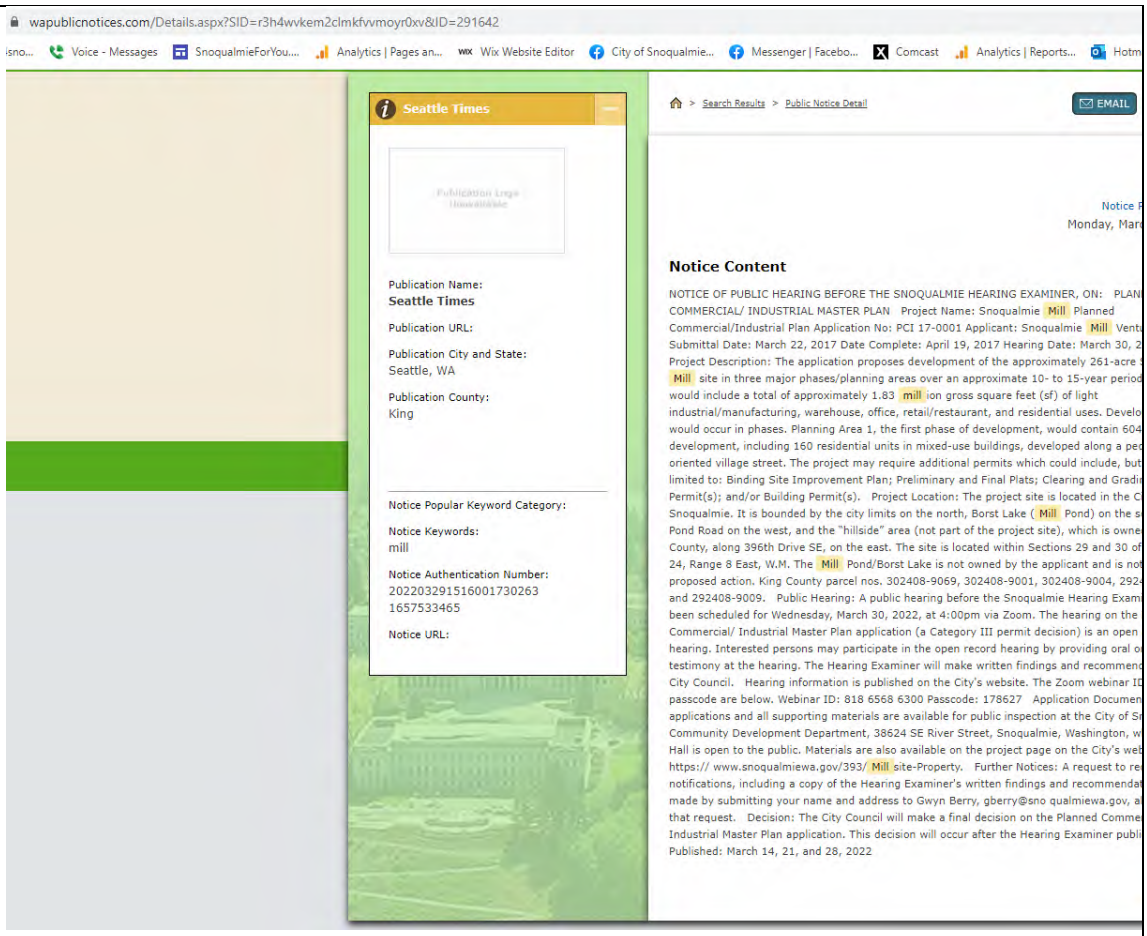
Notice of the public hearing by the county legislative authority on the proposed incorporation shall be by one publication in not more than ten nor less than three days prior to the date set for said hearing in one or more newspapers of general circulation within the area proposed to be incorporated. Said notice shall contain the time and place of said hearing. [**1986 c 234 § 8**; **1965 c 7 § 35.02.040**. Prior: **1957 c 173 § 4**; prior: **1953 c 219 § 3**; 1890 p 131 § 2, part; 1888 p 221 §§ 1, 2, part; 1877 p 173 §§ 1, 2, part; 1871 p 51 § 1, part; RRS § 8884, part.]

For a ZOOM call, the ZOOM link is equivalent to the place.

https://www.wapublicnotices.com/Details.aspx?SID=r3h4wvkem2clmkfvvmoyr0xv&ID=290056



https://www.wapublicnotices.com/Details.aspx?SID=r3h4wvkem2clmkfvvmoyr0xv&ID=291642



Concern 2) Mailed notices: affidavit of mailing not on the website, mailing addresses are not correct, one 14 acre property owner was not listed. All taxpayers and utility payers SHOULD be notified by mail for this public hearing because of how much city owned property is within 500 feet of an historically large project for the region.

Not giving proper notice has been a problem for the city. Other projects that did not conform to city code regarding notice: Snoqualmie Parkway hotel and plaza, Safeway, Bartells, Mod Pizza, and Starbucks did not mail notices to residential property owners within 500 ft,

14.30.060 Notice of application.

D. The city shall maintain on file certificates of mailing when mailing is required, which certificates shall include a statement under penalty of perjury of the laws of the state of Washington that on the specified date copy of the notice was placed in the United States

mail, postage prepaid, to the persons whose names and addresses are contained in the certificate or on an attachment thereto. (Ord. 768 § 2, 1996).

19.08.200 Public hearing rules.

C. Where specific parcels of property are involved, hearing notice containing the same information as required to be published shall be mailed at least 12 days prior to the hearing date to the owners of record of the property involved and to the owners of record of all properties within 500 feet of the boundaries of the property involved in the hearing.

https://www.snoqualmiewa.gov/DocumentCenter/View/34302/Exhibit-D---Property-Owners-within-500-ft-of-Project-

EXHIBIT D Snoqualmie Mill Site PCI Appliaction Mailing List

SNOQUALMIE MILL VENTURES LL	38800 SE MILL POND RD	SNOQUALMIE, WA	98065
WEYERHAEUSER COMPANY	5601 396TH D	SNOQUALMIE, WA	98065
KING COUNTY-PARKS	7001 396TH DR SE	SNOQUALMIE, WA	98065
SNOQUALMIE CITY OF	38180 SE MILL POND RD	SNOQUALMIE, WA	98065
CLAREMONT FOREST LLC	40120 SE 70TH DR	SNOQUALMIE, WA	98065

Name Not Listed	**Site Address** Not USPS Address	**Mailing Address**
KING COUNTY-PARKS	7001 396TH DR SE Snoqualmie WA 98065	201 S JACKSON ST #700 SEATTLE WA 98104
WEYERHAEUSER COMPANY	5601 396TH DR SE Snoqualmie WA 98065	TAX DEPARTMENT 220 OCCIDENTAL AVE S SEATTLE WA 98104
CLAREMONT FOREST LLC	40120 SE 70TH DR Snoqualmie WA 98065	40404A SE 70TH DR SNOQUALMIE WA 98065
SNOQUALMIE CITY OF	38180 SE MILL POND RD Snoqualmie WA 98065	PO BOX 987 SNOQUALMIE WA 98065
SNOQUALMIE MILL VENTURES LL	38800 SE MILL POND RD Snoqualmie WA 98065	4119 EAST LAKE SAMMAMISH PARKWAY SE SAMMAMISH WA 98075
QUADRANT HOMES	**Parcel # 192408-9042 (14 acres)**	**14725 SE 36TH ST STE 200 BELLEVUE WA 98006**

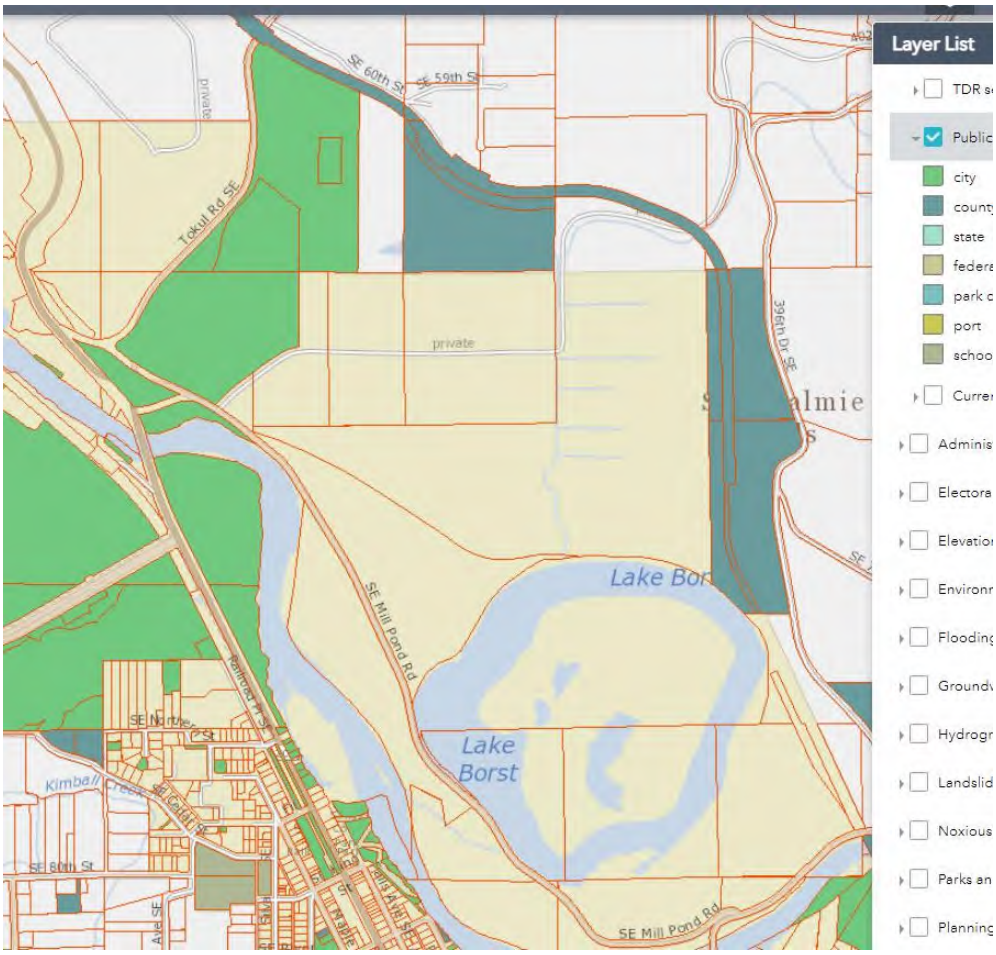
Quadrant homes, parcel # 192408-9042 (14 acres) was not on Exhibit D, but is next to the project.

Anytime significant acreage owned by the City of Snoqualmie is in the proximity of significant acreage for a development project with so much expense on the line, that at the very least all utility

consumers of the city's utility and city taxpayers in the city would be mailed a notice. The residents are owners/stakeholders in this.

How many acres is owned by the city near this project? See the screen shot below, light green is owned by the city. It was taxpayer money that paid for the waste water treatment plant and the drinking water system.

The North Wellfield is within 1 year time of travel for groundwater between the well field and the project, which supplies most of the city's drinking water – which impacts all water consumers in and out of Snoqualmie.



Area of Contamination map from WA DOE

Area of contamination

The map below is labelled as “Area of contamination” by

[Weyerhaeuser Snoqualmie Mill - (10346) (wa.gov)]

Area of contamination

https://apps.ecology.wa.gov/cleanupsearch/site/image/2966

GMA - Snoqualmie

In the attached document, PSRC is saying to Snoqualmie what deficiencies they have to correct in order to gain full certification, as of 2/25/2016 the city is conditionally certified.

The 2013 and 2021 WSPs both show that demand will exceed water rights by 2028. An application for new rights has been pending for 27 years. The mill site is projected to take 10-15 years to develop, demand will exceed water rights years before the projected completion of the mill site – with the most known contaminated portions of the property being the last to be addressed.

https://www.snoqualmiewa.gov/DocumentCenter/View/13746/Resolution-1380-Calling-for-PSRCs-Full-Cert-Transportation-Element-of-Snoqualmie-2032-Comprehensive?bidId=
RESOLUTION 1380
February 25, 2016

"PSRC last certified the Snoqualmie comprehensive plan in September 2005."

"The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC's Interlocal Agreement Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council's Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part N: Implementation."

"Conditional status is in place until the City of Snoqualmie amends the comprehensive plan to address inconsistency between the anticipated housing and employment growth included in the plan and the countywide adopted growth targets. This may include amending the comprehensive plan to:

- Adjust the plan's anticipated population and employment growth, including for the unincorporated area, to more closely align with the adopted countywide targets. It is recognized that the city's plan for growth will not fully align with the adopted growth targets due to recent and future unavoidable growth from planned developments.
- Expand recognition of the Regional Growth Strategy, including striving to manage growth consistent with the role of designated Small Cities.
- Include policy and actions to further manage growth consistent with the Regional Growth Strategy, including policies related to the timing and development of the unincorporated urban area.
- Include policy and actions that support working with King County to manage the development and annexation of the adjacent unincorporated urban growth areas consistent with the Regional Growth Strategy.

DISCUSSION: CONDITIONS FOR CERTIFICATION
The city should address the following provisions of the Growth Management Act and VISION 2040 as stated in the conditional certification recommendation:

- As stated under the Certification Recommendation, it is recognized that the city's plan for growth cannot fully align with the adopted growth targets due to recent and future unavoidable growth from planned developments. However, the comprehensive plan's anticipated population and employment growth should still be adjusted to more closely align with the adopted countywide targets. Land use element tables 7.6/7.7 and assumptions project household and employment growth significantly in excess of the adopted growth

targets for the city and potential annexation areas. Discussion in the land use element explains that commercial and housing development in the years since King County's growth targets were adopted, combined with in-progress development agreements, and growth in the unincorporated growth areas will lead to targets being exceeded by about a projected 1,600 housing units and 2,400 jobs during the planning period.

- "VISION 2040 calls for local comprehensive plans to address the following public services policy topics:"
- "Promote more efficient use of existing services, such as waste management, energy, and water supply, through conservation — including demand management programs and strategies. Plan for long-term water needs, including conservation, reclamation and reuse."

PS5 - PSRC - GMA - TARGETS Resolution

Weyerhaeuser

How can toxic cleanup happen when the water system runs out of water rights nine years before development is finished? [A]

The Weyerhaeuser site is in Snoqualmie city limits, the draft 2021 water system plan (WSP) says water rights will run out in 2028[B]; the current/approved 2013 WSP says water rights will run out in 2027[C].

In 2010 the North and South Wellfields' demand exceeded capacity; this deficit was created by diverting raw water to the Class A water system instead of using reclaimed water[D]. The 2013 WSP says that the city does not have adequate water right at the North wellfield to supply water to the Class A water system[E], the 2021 WSP says it does not make a comparison of the Class A water system and raw water can be diverted from the North wellfield to the Class A water system when needed[F].

Both 2013 and 2021 WSPs recommend getting more water rights, but getting more water rights can take decades; for example, application G1-27589 applied for in 1995 is still pending.[G]

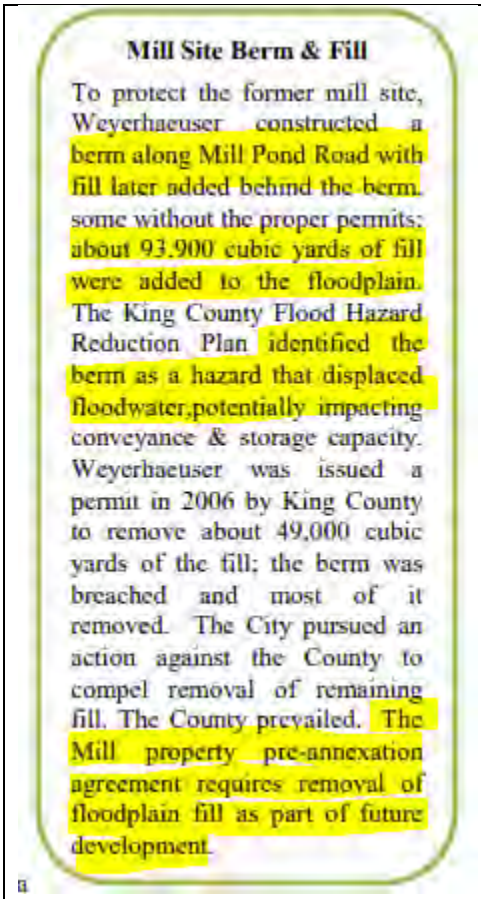
The phased approach, where least studied / least cleanup acreage is developed first, leaving confirmed-contamination acreage last, to be developed/cleaned when there is a water deficit projected for the horizon, Borst Lake is not even in the plan.

Two adjacent jurisdictions listed in the 2021 WSP are City of North Bend and Sallal Water Association [H], they are struggling with water rights and have for years. [I]

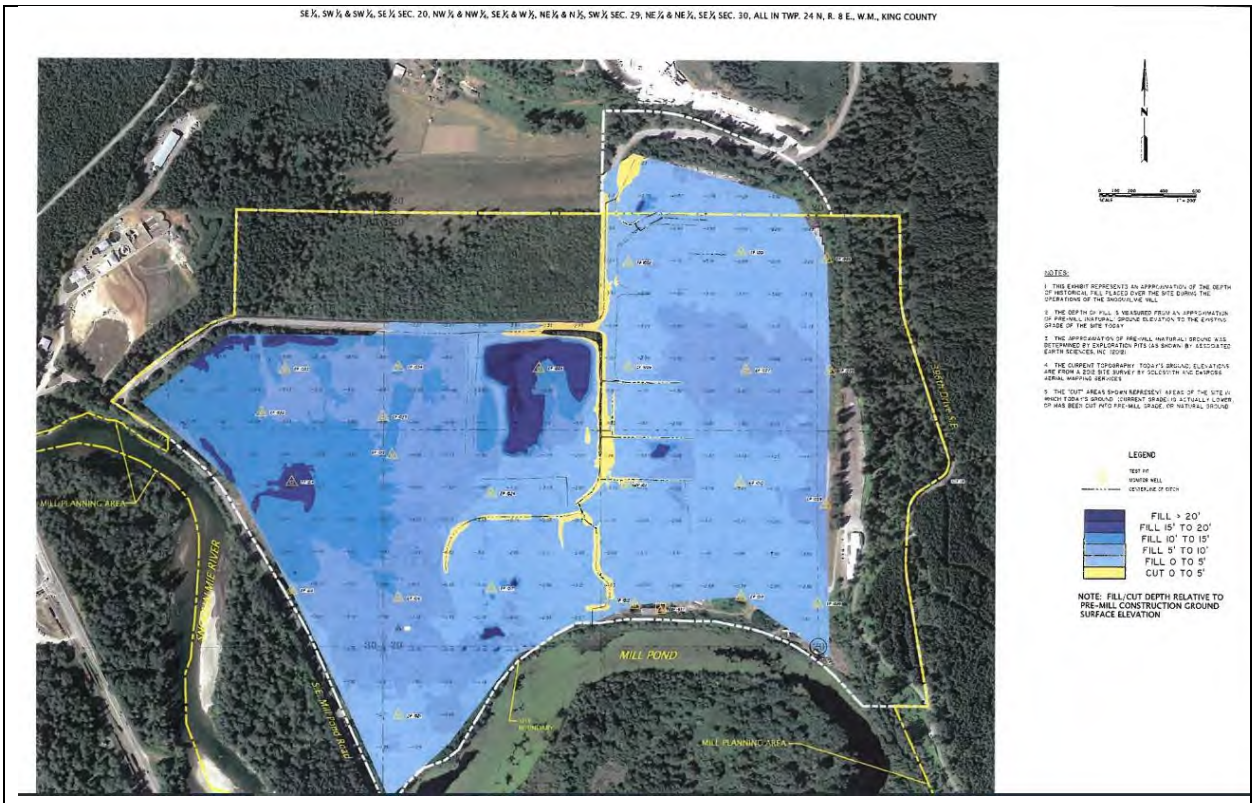
In reading the 2013 WSP, the first draft had a lot of corrections in reading the comments submitted by the Department of Health, some people assume that the draft 2021 WSP is probably going to be rubber stamped - but if it is anything like the 2013 plan, the 2021 plan will be thoroughly vetted and significant changes could be made to it.

There are a couple of thoughts that crossed my path that I haven't looked up the sources, but in the DEIS it says that they looked at old images of the first planning area and see residences for the Japanese internment camp cabins. The question that one document raised is underground storage of heating oil might be under where the cabins were.

The city's comprehensive plan mentions a requirement to remove ~40K+ cubic yards of fill as part of development. I would think that if the fill were removed, that would provide more ground to recharge the aquifer. Flooding was significant around the millsite a couple of weeks ago, which is an annual event. For context, a car was completely submerged in water sitting on the road next to Borst lake.



Below is an illustration of the fill at the millsite. You can see that a lot of the first planning area has fill that is 10 to 15’ deep. A few areas the fill is up to 20’ deep and more.



A "the water system runs out of water rights nine years before development is finished?"	Based on the projected water deficit from the 2021 WSP and the Cover Letter for the Draft EIS that development will complete in 15 years*, development on the site will finish 9 years after the city runs out of its projected water capacity.

Current year	2022
Years to develop	+15
Finish development	**2037**
Water deficit begins	-2028
Years developing after water deficit begins	**9**

*"The Snoqualmie Mill proposal / PCI Plan Alternative would redevelop the site in three phases (Planning Areas), over an approximate 10- to 15-year period."

B "the draft 2021 water system plan (WSP) says water rights will run out in 2028"

Available source capacity: 3,261*

Year	MDD without WUE (gpm)**	Surplus or Deficiency (gpm)***
2028	3,251	10
2029	3,269	8

* Available source capacity: 3,261 from Table 7-2

** MDD without WUE (gpm) from Table 4-14

*** Surplus or Deficiency = Available source capacity 3,261 – MDD without WUE (gpm)

Table 4-14

Future ERU Projections

Description	2027	2028	2029
ADD (gpm)	1,204	1,212	1,219
MDD without WUE (gpm)	3,232	3,251	3,269

Table 7-2

Water Source Capacity Evaluation

Description	Base Year 2017	Projected 2030 (+10 years)	Projected 2040 (+20 years)
Required Supply (gpm)			
Maximum Day Demand	**2,585**	**3,302**	**3,798**
Available Source Capacity (gpm)			
Canyon Springs	898	898	898
North Wellfield	1,800	1,800	1,800
South Wellfield	563	563	563
Total Source Capacity	**3,261**	**3,261**	**3,261**
Surplus or Deficient Source Capacity (gpm)			
Surplus or Deficiency	**676**	**-41**	**-537**

	ADD – Average Daily Demand Deficit – more demand than capacity gpm – gallons per minute MDD – Maximum Daily Demand WUE – Water Use Efficiency

C "the current/ approved 2013 WSP says water rights will run out in 2027"	"the City does not have adequate instantaneous withdrawal water rights to meet the total projected maximum day production requirements through the 20-year planning period and is expected to exceed them by 2027."

D "the North and South Wellfields demand exceeded capacity in 2010; one cause for the deficit was supplementing water to the Class A water system."	**TABLE 3-11** **2010 Water Rights Analysis** See table below.

Developed Sources	Water Right		2010 Withdrawal		2010 Surplus/(Deficit)	
	Instant., (gpm)	Annual, (ac-ft/yr)	Instant., (gpm)	Annual, (ac-ft/yr)	Instant., (gpm)	Annual, (ac-ft/yr)
Canyon Springs	898	1,448	815(1)	383	83	1,065
North Wellfield	1,650	724	1,732(2)	909	(82)	(185)
South Wellfield	600	500	627(3)	101	(27)	399
System-Wide(4)	**3,148**	**2,162**	**1,932**	**1,393**	**1,216**	**779**

(1) Maximum day occurred on August 7, 2010.
(2) Includes 521 gpm water produced to supplement the Class A water system. Maximum day occurred on July 16, 2010.
(3) Maximum day occurred on July 30, 2010.
(4) System wide maximum day occurred on July 23, 2010.

E "The 2013 WSP says that the city does not have adequate water right at the North wellfield to supply water to the Class A water system"	The City intends to continue developing the reclaimed water treatment system such that raw water is not needed to supplement reclaimed water. Raw water diverted to the Class A system is not included in future capacity analyses since there is not adequate water right at the North Wellfield to support continued use of well water for Class A irrigation.

F "the 2021 WSP says it does not make a comparison of the Class A water system and raw water can be diverted from the	Since the reclaimed water system operates independent from the potable water system, a comparison of its supply and demand is not included in this Water System Plan.

North wellfield to the Class A water system when needed"	The City utilizes reclaimed wastewater for municipal irrigation applications and has the ability to divert raw water from the North Wellfield prior to treatment when additional irrigation supply is needed.

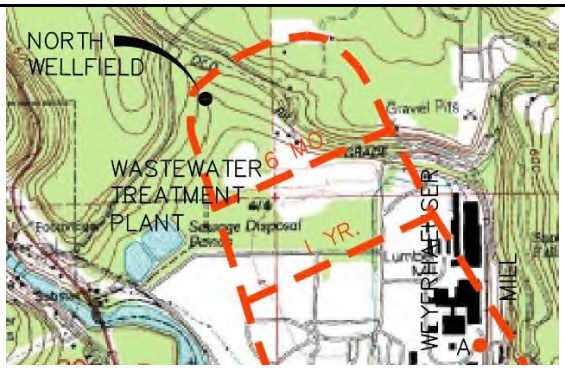
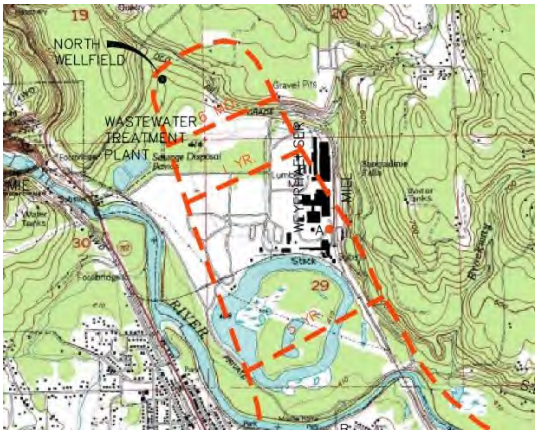
G "getting more water rights can take decades. … application G1-27589 applied for in 1995 is still pending."	Ground Water Application G1-27589, with a priority date of March 16, 1995, … This application remains pending in Ecology's water right application processing queue. Current year: 2022 Year applied: 1995 **Waiting years: >27**

H "Adjacent jurisdictions identified in the 2021 WSP: City of North Bend and Sallal Water Association"	

I "City of North Bend and Sallal Water Association have struggled with water rights issues for years."	"In 1999, North Bend went into a building moratorium because it was exceeding its water permit. The city was exceeding its allotment since the mid 1980s, according to a 1999 city briefing obtained by the Record. North Bend officials discovered they were using the wrong formulas to calculate water usage, previous Record reporting found." North Bend set to fine Sallal Water Association $2000 a day Sallal Water Association at risk of takeover by City of North Bend Appeal challenges North Bend's water system plan North Bend continues development push as water situation remains unclear North Bend failed to properly mitigate water for six weeks

Snoqualmie Mill Issues - wellhead protection, in 1 year time of travel

Plan Area 1 is in 1 year time of travel from the North Wellfield AND ALSO in the area of contamination.

Approximate comparison of where the North Wellfield Wellhead Protection Area is in relation to Plan Area 1.	**2013 and 2021 Water Plans are the same for the North Wellfield Wellhead Protection Area**
	 2013 Water System Plan https://www.snoqualmiewa.gov/DocumentCenter/View/1908/Water-System-Plan-February-2013-PDF page 143 Figure 6-2  2021 Water System Plan

	https://www.snoqualmiewa.gov/DocumentCenter/View/33157/Snoqualmie-Water-System-Plan-Agency-Review-Draft-2021-08-PDF Page 631 Figure 6-2
Area of contamination https://apps.ecology.wa.gov/cleanupsearch/site/10346 **Facility Site ID:73953138 Cleanup Site ID:10346** 2021 Water System Plan **https://www.snoqualmiewa.gov/DocumentCenter/View/33157/Snoqualmie-Water-System-Plan-Agency-Review-Draft-2021-08-PDF**	2021 Water System Plan **https://www.snoqualmiewa.gov/DocumentCenter/View/33157/Snoqualmie-Water-System-Plan-Agency-Review-Draft-2021-08-PDF** **Page 624** "The following tasks will be pursued as part of the City's ongoing Wellhead Protection Program: …*Restrict land uses in the 1-year time of travel zones that pose a high risk to groundwater*, such as gas stations, oil recycling, dry cleaners, fuel storage facilities, high-density animal keeping, high-density septic systems, and golf courses. Update the City's wellhead protection ordinance as necessary. Coordinate these efforts with King County" **Page 622** Table 1 Potential Point Sources of Contamination - Confirmed or Suspected Contaminated Sites

2021 Water System Plan

https://www.snoqualmiewa.gov/DocumentCenter/View/33157/Snoqualmie-Water-System-Plan-Agency-Review-Draft-2021-08-PDF

Page 624

"Wellhead Protection Program The Washington State mandate for wellhead protection, and the required elements of a wellhead protection program, is contained in WAC 246-290-135, Source Protection. A wellhead protection program is a proactive and ongoing effort of a water purveyor to protect the health of its customers by preventing contamination of the groundwater that it supplies for drinking water. ***Group A public water systems that use groundwater as their source are required to develop and implement a wellhead protection program.*** All required elements of a local wellhead protection program must be documented and included in either the Water System Plan (applicable to the City) or a Small Water System Management Program document (not applicable to the City). A copy of the City's Wellhead Protection Program is contained in Appendix K."

Expired Water System Plan

FEIS:

"Per ***WAC 246-290-100(9)***, the period of approval of the City of Snoqualmie Group A water system plan is ***10 years*** from the October 9, 2013 Department of Health approval."

WAC 246-290-100

"(9) Department approval of a water system plan is effective for ten years from the date of written approval ***unless***:

(a) The purveyor requests and receives a plan approval period of ***less than ten years***; ..."

King County Ordinance 17656 posted on the City of Snoqualmie's website for the 2013 Water Plan, an ordinance approving the City of Snoqualmie's water system plan by King County Council.

https://www.snoqualmiewa.gov/DocumentCenter/View/32046/King-County-Letter-Approving-2013-Water-System-Plan-PDF

"RCW 70.116.050 requires that general comprehensive plans for water within critical water supply service areas be submitted to, and approved by, the legislature authority within whose boundaries all or a portion of a utility lies."

"King County regulations **require water system plans to be updated every six years**."

https://kingcounty.gov/council/legislation/kc_code/16_Title_13.aspx

Misleading FEIS Statement: Targets … are not a Cap

"Growth Management Act (GMA) population targets are considered a minimum that must be planned for and *are not considered to be a cap*." - FEIS
https://www.snoqualmiewa.gov/DocumentCenter/View/33758/FEIS_Compiled_PrintReady_2021_1209-PDF page 40

RESPONSE: Growing more than GMA targets could keep Snoqualmie from being certified by PSRC, unable to compete for regional TIP and federal funds. in 2019 the city sent a letter to PSRC that growth targets are "a blunt instrument", requesting they be a minimum.
Letter from City of Snoqualmie Mayor Larson to Puget Sound Regional Commission (PSRC) VISION 2050 Draft SEIS Comment

https://www.psrc.org/sites/default/files/vision2050dseispubliccomments.pdf
page 105

"Transit Focused Growth option will encourage PSRC use of growth targets as a blunt instrument in small city relationships. To date, growth targets provided to the City of Snoqualmie have not adequately incorporated signed development agreements and local growth trends- the last PSRC certification of the City Comprehensive Plan was particularly embattled at the staff level."

Consequence for a comprehensive plan that is greater than the GMA growth target: Conditional Certification

https://www.psrc.org/sites/default/files/gmpb201611-pres-smallcities.pdf

"PSRC's 2016 Policy Framework for Federal Funds: – "Certification (full or conditional) is required to compete for PSRC's **federal funds**, as well as to program projects with any funding source into the Regional **TIP**."

The region's 46 smaller cities and towns are **expected to remain relatively small for the long term**."

Small Cities and Conditional Certification

Planned Growth

- **Planned growth significantly different from adopted targets**

	Original Housing Target	Housing Target Remaining	Plan Assumes	X orig. target	Original Jobs Target	Jobs Target Remaining	Plan Assumes	X orig. target
Bonney Lake	2,670	521	3,711	1.4x	1,141	N/A	1,141	N/A
Carnation	330	330	917	2.8x	370	531	N/A	N/A
Covington	1,470	1,542	3,920	2.7x	1,320	383	3,706	2.8x
Gig Harbor	2,130	1,871	2,202	1x	1,603	799	5,228	3.2x
North Bend	665	415	2,331	3.5x	1,050	150	7,092	6.8x
Snoqualmie	1,615	537	2,126	1.3x	1,050	313	2,733	2.6x

Small Cities and Conditional Certification

What was required?

General requirements for conditional certifications:

- Recognize Regional Growth Strategy and the role of Small Cities.
- Review and adjust the anticipated housing and employment growth, while recognizing actual and pipeline development.
- Identify strategies to manage growth and/or to address the impacts of growth on regional and local infrastructure and the environment.

- Allows for city-specific approach
- Doesn't seek downzone, metering or moratorium

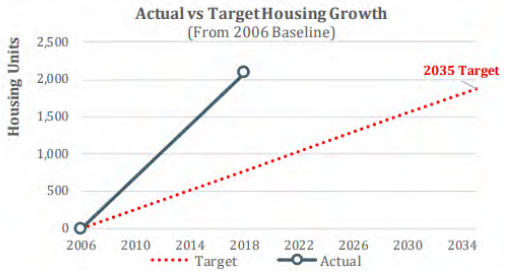
https://kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/buildable-lands-report/KC-UGC-FINAL-Report-Appendices-and-Technical-Update-2021-0728.ashx?la=en

Snoqualmie	Snoqualmie Public Works	Transportation	2032 LOS E anticipated at SR 202 & Newton St. Intersection	Full Traffic signal when volumes meet signal warrant.	No	

Jurisdiction	Service Provider	Infrastructure Type	Service Deficiencies	Planned Investments	Infrastructure Gap Present?	Additional Notes
Snoqualmie	Snoqualmie Public Works	Water	A study on securing water rights is planned. If new rights are secured, the main line from Canyon Springs will need to be secured & enhanced.	Source of Supply Investments - Improvements (Canyon Springs water line stabilization and spring boxes)	Yes	
Snoqualmie	Snoqualmie Public Works	Water	Adequate Water Main supply across the Snoqualmie River	SR 202 Bridge Water Main Replacement (part); and 705 to 599 Zone Conversion	Yes	
Snoqualmie	Snoqualmie Public Works	Sewer	Adequate Sewer Main supply across the Snoqualmie River	SR 202 Bridge Sewer Main Replacement (part).	Yes	
Snoqualmie	Snoqualmie Public Works	Sewer	TSS filtration(processing capacity)	Oxidation Ditch Improvements, Third Secondary Clarifier and Reclaimed Water Filters Replacement.	Yes	

City of Snoqualmie

Housing Growth and Residential Development Trends



Snoqualmie Housing Growth Target: 2006-2035	1,873
2006 Estimated Housing Units	2,864
2018 Estimated Housing Units	4,951
Estimated Housing Growth	**2,087**
Remaining 2035 Target	0

% of Pace Needed to Achieve 2035 Housing Growth Target	Average Annual 2006-2018 Growth Rate	2018-2035 Avg. Annual Growth Needed to Meet 2035 Target
269.2%	4.67%	Met Target

Since 2006, Snoqualmie has grown at 269% of the pace needed to achieve its 2035 housing growth target of 1,873 units. During this period, the total number of housing units in Snoqualmie grew by roughly 73%. Snoqualmie has achieved its 2035 housing growth target.

Not enough water for the Mill Site

In 2016 the Mill site did not have water

https://www.snoqualmiewa.gov/DocumentCenter/View/3517/Economic-Development-Commission-Minutes-September-21-2016-PDF?bidId=

9/21/16

"Water Rights
Bob Sterbank, City Attorney
Water rights that the City has now are sufficient for completion of the build out of Snoqualmie Ridge II, business park expansion, Salish expansion, Mount Si High School, and downtown development. The mill site still has to go through a master site planning process, which will include the **need to secure water resources**. "

Water Right Application No. G1-27589

As of December 21, 2021

Water Right Application No. G1-27589; Phase 1: Conceptual Mitigation Plan was due to Ecology July 31, 2021 and Ecology Review was 60 days

2283261_54_7_3258500.pdf

Reference All Mill Plan Documents in the Official Record

The FEIS should reference the Mill Plan Reference Documents from 2017.
https://www.snoqualmiewa.gov/520/Mill-Plan-Reference-Documents-2017

Jason Rogers

From: Karen Yoshitomi <kareny@jcccw.org>
Sent: Wednesday, March 30, 2022 3:49 PM
To: Gwyn Berry
Cc: Tokita, Kurt; Jolivette, Stephanie (DAHP); Wilson, Doug C
Subject: Snoqualmie Mill Planned Development - Public Comment
Attachments: JCCCW Comments EIS.pdf

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

Please find attached for transmission to the Hearing Examiner, comments from the Japanese Cultural & Community Center of Washington regarding the Snoqualmie Mill Planned Development project.

If there are any questions, or need for clarification, or a problem with this transmission, please let me know.

Thank you.

Sincerely,
--
Karen Yoshitomi
Executive Director
Japanese Cultural & Community Center of Washington
1414 South Weller Street | Seattle, WA 98144
t 206.568.7114 ext. 107 | **e** KarenY@jcccw.org
jcccw.org | Facebook | Twitter

JAPANESE CULTURAL & COMMUNITY CENTER of WASHINGTON

March 30, 2022

City of Snoqualmie
Community Development Department
38624 SE River Street
PO Box 987
Snoqualmie, WA 98065

Submitted via email: gberry@snoqualmiewa.gov

Re: Snoqualmie Mill Planned Development / Industrial Plan
Application No: PCI 17-0001
Applicant: Snoqualmie Mill Ventures

On behalf of the Japanese Cultural & Community Center of Washington (JCCCW), I am submitting the following comments for your consideration. The JCCCW was established in 2008 as a non-profit organization. Part of the mission of the JCCCW is to help preserve and share Japanese American history in Washington State. The JCCCW currently owns and operates programs and events in the buildings that housed the Seattle Japanese Language School (*Nihongo Gakko*). The Seattle Japanese Language School is a City of Seattle Historic Landmark, and is listed on the National Register of Historic Places.

Based upon the Draft Environmental Impact Statement (DEIS) and in particular Appendix E of the SEPA Cultural Resources Assessment of the Snoqualmie Mill Planned Development, the JCCCW is providing the following comments for consideration:

1) We believe that further archeological testing of the Japanese Community Site (45-KI-1474) is warranted. At a minimum, additional data should be gathered in order to delineate the site, determine the potential number of artifacts, and collect samples.
2) We have initiated contact with staff at the Department of Archeology and Historic Preservation (DAHP) to submit an application for the Snoqualmie Falls Company (SFCO) Mill Site to be listed on the National Register for Historic Places. We would also ask that the area which contained the Japanese bunkhouses (within 45-KI-1474) be included within the historic district boundaries.
3) We have already consulted with a regional archeologist at the National Park Service to identify potential federal support to preserve and protect the site if the SFCO Mill Site and Japanese bunkhouse area are listed on the National Register.
4) We have reached out to the University of Washington, through two departments: American Ethnic Studies and Archeology. Faculty in both departments have expressed support and willingness to work with the JCCCW and community stakeholders to work on this project.
5) The JCCCW officially requests an opportunity to discuss mitigation with the Developers and to be included in the development of an interpretive plan.

Thank you for the opportunity to comment on the proposed project plan. If you have any questions, please feel free to contact me at KarenY@jcccw.org or by phone, 206-568-7114, ext. 107.

Sincerely,

Karen Yoshitomi

Cc: Kurt Tokita, Nikkei Heritage Association of Washington, Board President
Douglas Wilson, National Park Service, Interior Regions 8, 9, 10, & 12, Archeologist
Stephanie Jolivette, Washington State Department of Archeology and Historic Preservation

Jason Rogers

From: Greg Balmer <gregbalmer@hotmail.com>
Sent: Wednesday, March 30, 2022 3:51 PM
To: Gwyn Berry
Subject: RE: Snoqualmie Mill Planned Commercial/Industrial Plan PCI 17-0001
Attachments: March 30.docx

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

Gwyn,

Please find attached my written comments RE: Snoqualmie Mill Planned Commercial/Industrial Plan PCI 17-0001

Thank you,

Greg Balmer
PO Box 24
Snoqualmie, WA
gregbalmer@hotmail.com

Sent from Outlook

March 30, 2022

City of Snoqualmie

Ms. Sharon Rice

C/o Gwyn Berry

RE: Snoqualmie Mill Planned Commercial/Industrial Plan PCI 17-0001

Please accept this letter as my citizen comment on the proposed Mill Site Development. This project as presented by the developer, should be rejected due to the following issues.

1. The site has been identified as a toxic site. While the developer states that they will ensure that clean up and mitigation measures will be taken by the developer during construction the means and methods are not clearly defined. It seems to be foolish to trust that a commercial developer will give this issue the attention that it deserves during construction. Time is money during any construction project. Attention to assessment and mitigation measures would likely not be top priority without strong oversite on the issue. A more thorough study of existing conditions and a comprehensive mitigation plan should be developed prior to any construction taking place. A qualified 3rd party should be retained to assess the site before and during construction operations. Allowing the developer or the city to perform assessment roles is just too risky with this contaminated site.

2. The city of Snoqualmie currently lacks the road and other infrastructure capacity to support this development. The EIS statement indicates that the developer will help with costs to the city for needed road and other infrastructure improvements. However, there is a troubling lack of detail. It has been claimed that there may be over 3,000 new jobs created at the new development. Plus added visitor traffic. This amount of growth in a currently remote area will certainly require additions and or modifications to our existing road network. It is a pretty sure bet that the costs to bring the road capacity up to a point to handle the added traffic will mainly be paid for by the city and its taxpayers. It is not fair to put the burden of infrastructure improvement on the current and future taxpayers of Snoqualmie to support this development.

3. What is really being constructed at the site? The project is being broken up into 3 phases. This seems reasonable but what the site will look like upon completion is not fully fleshed out. This leaves a lot of room for improvisation after construction has started. A more fleshed out description of the project should be presented to the city and its citizens prior to start up. The council should have a clear idea of what exactly we are getting on the site before approval.

4. I incorporate by reference in my comments the submittals of the Snoqualmie Community Action Network (SCAN) on March 30, 2022.

Thank you for your consideration,

Greg Balmer

PO Box 24

Snoqualmie, Wa. 98065

425-270-9206

Jason Rogers

From: Sharilyn Lux <luxlanguages@gmail.com>
Sent: Wednesday, March 30, 2022 3:59 PM
To: Gwyn Berry
Subject: Fwd: Millsite Appeal Comments

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---------- Forwarded message ---------
From: **Sharilyn Lux** <luxlanguages@gmail.com>
Date: Wed, Mar 30, 2022 at 3:56 PM
Subject: Millsite Appeal Comments
To: Katherine Ross <KRoss@snoqualmiewa.gov>, Council Members <CouncilMembers@ci.snoqualmie.wa.us>, Bob Sterbank <BSterbank@snoqualmiewa.gov>, Anna Astrakhan <AAstrakhan@snoqualmiewa.gov>, <tips@nytimes.com>, <tips@komonews.com>, <editor@valleyrecord.com>

The fault line running through the millsite. Who is the used car salesman who forgot to talk about that?
Trotting the globe wasting our taxes, living large. James Whitney Mayhew.
Greasy, used car sales man for the Millsite.

March 30, 2022

Dear Mayor Katherine Ross, James Whitney Mayhew, Bob Sterbank, and each member of The City of Snoqualmie City Council, and Planning Department-Specifically Jason Rodgers:

Amongst all the other reasons why the Mill Site Development plans, as proposed are a very poor idea are what is being totally ignored. The biggest powers that are controlling the river, not the City. The earth, and the fault lines. Running undernearth the Snoqualmie River and to the Millsite. And that extinct volcano right there.

Aside from the environment mess that needs a proper clean up, by those responsible, this is not a geologically fit area for development, at the Millsite.

Please reference the below information regarding the faults. As we all know earthquakes here are common and inevitable, so this is not an acceptable plan to run utilities, especially gas across this River to the Millsite. This is nothing short of quite simply a very bad idea to cover up 150 years of poor land stewardship, and disrespect for the earth, land and water, from here to the Puget Sound.

This includes ignoring what we CAN NOT CONTROL. Earthquakes, natural disasters. We can prevent further disasters, by NOT DEVELOPING…where one clearly SHOULD NOT. On a fault line. It is like putting fill on the top of Mt. St. Helens, and a cement cap to sell it to some unknowing developer, who would buy that it is now a good idea to put a hotel there.

Think of pipes with all those utilities spewing from here to Whidbey Island, that is a big no brainer. No go. No development. No more pollution. No.

Get rid of James Whitney Mayhew from our local politics. He is as toxic as the brownsite, the Mill. Trotting the globe, wasting how many millions of our tax dollars to push this deal? It is as disgusting as the crimes that Mayhew may be charged with. The local bankrupter of the town, the abuser of the citizens, abusing his position to try to sell of this brown-site with a fault line running through it.

Big quake in Snoqualmie Valley's future? | Snoqualmie Valley Record

Quaternary Fault and Fold Database of the United States (usgs.gov)

Southern Whidbey Island Fault Zone Mapped through Snoqualmie Valley – EAR TO THE GROUND WITH DNR & COMMISSIONER FRANZ (wordpress.com)

Sharilyn Lux

Jason Rogers

From: Kathryn Graham <kwiggett@hotmail.com>
Sent: Wednesday, March 30, 2022 4:09 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site - Public Comment

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

Dear Gwyn Berry,
The following is my comment for the public hearing of the Snoqualmie Mill Site.

Please consider rejecting the 1.83 million square feet of commercial, light industrial, warehouse, and office uses development of the Snoqualmie Mill Site and instead support proper remediation to ultimately connect the Snoqualmie Valley Trail and create an open space for citizens and wildlife to enjoy and thrive. The support of open space would uphold the following statements excerpted from Environment section of the Snoqualmie's comprehensive plan:
"*Urban forests provide multiple benefits to citizens in stable housing prices, quality of life, and even increased retail sales....*"

"*Maintaining linkages between cohesive blocks of habitat is also crucial for wildlife movement, but can be challenging. Further study and agency coordination is necessary to identify key habitat areas and opportunities to protect or provide linkages. Such linkage networks can also support multiple functions and benefits.*"
"*Tree canopy and significant trees are important factors for city livability, helping Snoqualmie retain its natural setting while benefiting residents and business. A 2011 brochure by the National Forest Service and US Department of Agriculture estimated that the average Pacific Northwest tree will provide $2,820 of services in its lifetime, or $48 net benefit annually, for home heating/cooling savings, air pollutant removal, health improvements, crime reduction, better business and higher property values.*"
"*It is calculated that in one year, 100 street trees will remove 13 tons of carbon dioxide (CO2), 123 pounds of other air pollutants and catch about 54,900 gallons of rainwater.11 They also provide bird and wildlife habitat, and grow food and materials for human use.*"
The Snoqualmie Mill Site development project is concerning for a number of reasons:

1. There has not been sufficient sampling of the soil and water in all of the development phase locations to gain an understanding of necessary remediations and potential environmental impacts.
2. Remediation will be expensive, so the developer has a strong financial incentive to minimize the remediation work.
3. Site preparation -- such as digging -- for the development will disturb the soil, so unless it is done extremely carefully and under an impartial agency, negatively impactful chemicals may be released into the environment. Potential affects to drinking water and the Snoqualmie River should be taken into consideration.
4. The Final Environmental Impact Statement addresses light pollution does not address building design to mitigate bird collisions. American Bird Conservancy has an excellent resource for information, designs, and policies.

Please consider the negative environmental impact that this development could have. If this project is approved and the remediation/construction processes are not handled with quality and integrity, citizen health and the natural environment could be compromised, which goes against Snoqualmie's comprehensive plan. The Environment section 6-1 of the Snoqualmie's comprehensive plan states "*The health, beauty and ecosystem services provided by the City's natural environment are protected and enhanced, and potential hazards to citizen health, welfare and property are minimized.*" (Source)
According to the WA State Department of Ecology's Site Hazard Assessment for the Weyerhaeuser Snoqualmie Mill, the overall rank is 1. The documentation states: "*Site ranks range from 1 to 5, with a rank of 1 indicating the highest risk relative to other ranked sites in Washington state.*"

The 2012 Snoqualmie Tree Canopy Assessment states that “Snoqualmie lost 768 acres of forest cover since 1998 (-19%).” and illustrates the benefits of trees:

Appendix

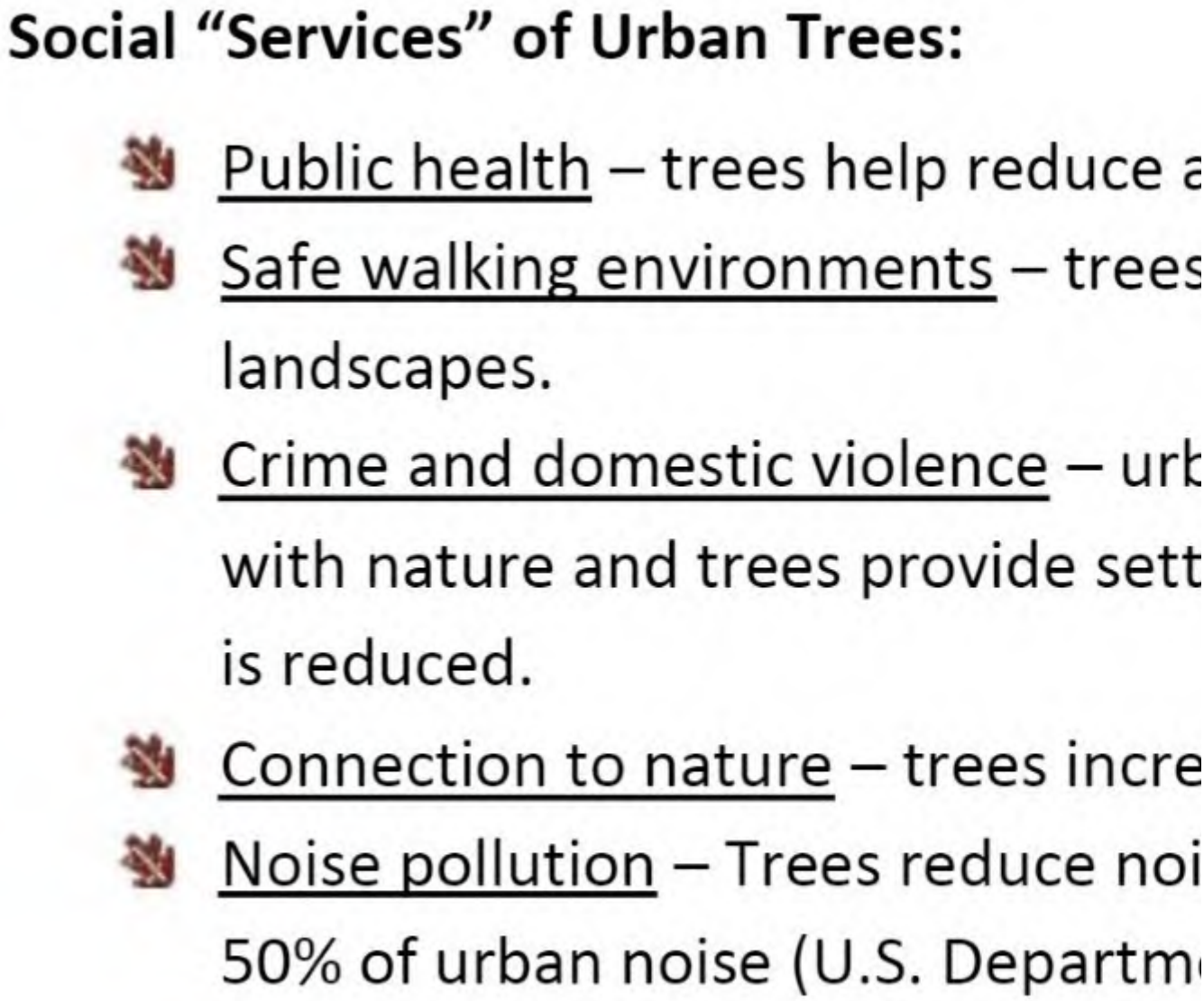
Included in the Appendix of this report are additional details on and methods used in this analysis, and a list of deliverables.

Urban Tree Benefits

The benefits of urban trees, sometimes called "ecosystem servic economic, and social values. These are direct or indirect benefit individual trees that are often dismissed or underrepresented w because they don't readily have an associated dollar value. Typ briefly described below. While none alone are a "silver bullet", collective urban forest are an impressive part of the solution for planning and community development.

Environmental "Services" of Urban Trees:

- Air Quality – trees absorb, trap, offset and hold air pollut ozone, sulfur dioxide, carbon monoxide, and CO^2.
- Greenhouse Gases (GHGs) and Carbon – trees store and photosynthesis as well as offset carbon emissions at the conservation.
- Water Quality and Stormwater Runoff Mitigation – trees intercept stormwater while also increasing soil permeab
- Erosion control – tree roots hold soil together along stre stabilizing soils and reducing sedimentation issues in wat
- Urban heat island effect – trees cool the air directly thro through transpiration, reducing day and nighttime temp
- Increased wildlife habitat – Trees create local ecosystem for birds and animals, increasing biodiversity in urban ar



Creating a forested open space would be in line with Snoqualmie's 2014 Urban Forest Strategic Plan objective: "*Promote tree planting, preservation, and maintenance on public and private lands to enhance the city's beauty, environmental health, wildlife habitat, and to take advantage of the economic value contributed by urban forests.*"

An open space at the Mill Site would also support the goal in the Community Character section of Snoqualmie's Comprehensive Plan: "*Preserve, protect and enhance Snoqualmie's community character and assure future growth is sensitively integrated into the City through design and the protection of character-defining resources.*"
Thank you for your time.

Sincerely,
Kathryn Graham

Jason Rogers

From: Morgan Siedel <morgan.siedel@gmail.com>
Sent: Wednesday, March 30, 2022 2:26 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan

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

I strongly oppose the development of the old Mill site. The Washington State Department of Ecology's hazard assessment found the site posed a high risk to human and environmental health and gave it a rating of 1 out of 5 with 1 being the highest potential threat to human and environmental health!! There is also no direct route for additional traffic to reach the highway, the traffic near the falls is already horrific enough. Allowing this site to be developed clearly poses a huge risk and threat to human and environmental health, only greed could possibly motivate people to look past this. Please vote NO to development of this site.

Sincerely,
Morgan Siedel
morgan.siedel@gmail.com

Jason Rogers

From: Amanda Rich <amandaorich@gmail.com>
Sent: Wednesday, March 30, 2022 4:48 PM
To: Gwyn Berry
Subject: Public comment

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

Ms. Berry,

I am unable to attend the public meeting regarding the Mill Site this afternoon.

I previously provided comments on the EIS and specifically mentioned the poor traffic study.

This proposal is not suited for Snoqualmie. First, the environmental impacts are not being fully considered. The fact that there are large areas that will not be cleaned is irresponsible and has the potential to cause irreparable harm to our natural environment.

Second, the city's infrastructure cannot support a development of this size. The roads leading to the area cannot handle it. And the traffic study cited parking, pullouts and other aspects that don't exist. This has been proven by other residents who walked the road.

Third, this development is not wanted by citizens of Snoqualmie. The opposition to this isn't NIMBYism. The development is too large and does not fit within the character of our community. The potential impacts to current residents have not been fully examined and that is clear from the previous study - it was not done correctly and contains incorrect information.

It's going to be harmful to Snoqualmie and should not be approved.

Regards,
Amanda Rich

8346 Silva Avenue SE
Snoqualmie, WA 98065

Amanda Rich
M.Ed., Education Policy
amandaorich@gmail.com
Mobile 425-295-4857

Co-Chapter Advisor - Alpha Chi Omega, Rho Chapter, Univ. of Washington

Jason Rogers

From: Dawn Harper <dawninsnoq@gmail.com>
Sent: Wednesday, March 30, 2022 5:07 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Site Planned Commercial Industrial (PCI) Plan

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

While listening to this presentation on the proposed Mill site, my concerns about the impact to this development will have on our valley is even greater than before. I strongly appose this development for several reasons.
1) the environmental impact will be tremendous. From storm water run off, to gas/oil pollutants, to sewage and flood concerns. The list of convene, while brushed off as insignificant to the developers, is real and will be felt by all respondents.
2) traffic, traffic, traffic. How will our already strained system support this glow of traffic and increase of visitor flow? Will they invest money to redesign the flow of all the traffic throughout the upper and lower valley? Traffic flow is an enormous issue already for highway 202, more people, more cars will not improve this problem.
3) lack of historical significance. The developer says they understand the valleys history, but it's obvious they don't when wineries are the basis. This area was hops, not vines. What about the acknowledgement of the indigenous claim to this ancestral land? How will this traffic affect the Snoqualmie sacred spaces and ancestral land movement? I did not hear any acknowledgement of this history or connection.
4) business. Our local businesses already have open space/unoccupied buildings. This news city center will take away from the existing business communities. This plan shows disregard and disrespect to our local business community.
5) open space. Open space has been identified as a desire by residents. If they truly believe in open space this area should kept open and free use to all.

Please consider the true impact this development would have on current and future residents; it's tremendous.

Thank you,
Dawn and Mark Harper

Jason Rogers

From: Kenneth McNeill <ken.p.mcneill@gmail.com>
Sent: Wednesday, March 30, 2022 5:19 PM
To: Gwyn Berry
Cc: Samantha Ghosn
Subject: Snoqualmie Mill Site Planned Commercial/Industrial (PCI) Plan.

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

Hello,

My name is Kenneth McNeill, I am a resident of Snoqualmie, along with my wife Samantha Ghosn, who also drafted this with me. I can provide our address if needed.

I am concerned about the proposal and feel that the following facts have not been considered.

The code states the following.

17.20.050 Planned commercial/industrial provisions.

A. The purpose of the planned commercial/industrial 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 two 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.

In this regard I feel some criteria has been overlooked.

My first concern is the scale of the project in regard to small town character. With the amount of buildings being added, 1.8 million sq ft, I think there should be a concern in many regards. The amount of traffic that would overwhelm the quaint nature of Snoqualmie, transforming it into something it is not. A development of this size would directly take away form the current small town character.

The proposed open space does not overcome the impact it would have on our town.

In addition, the development would drive a significantly heavier wear on our infrastructure. There are only two bridges, one of which is a one lane bridge, to access that side of the river. We would be putting a greater load than that infrastructure is designed to handle. This would increase costs and danger. It is already a danger to pull out of the falls area with the amount of people visiting that each weekend. The scale of this project would dwarf that, causing an even greater danger. The bridge access to reining road is a very difficult very sharp turn. If this turn saw a significant increase in cars we would almost certainly see an increase in accidents. Further, reinig road is a path from the Snoqualmie trail back to town. There is a significant amount of pedestrians on this road, there is no sidewalk, and as one of the main arteries away from the proposed developments, this would see a significant increase in traffic, and danger to pedestrians. Similarly, there is no bike lane, yet this is one of the main bike lanes. An increase in traffic flow, which would be generated but his project, would put all those people at risk. A town in which one can not walk safely on a road for fear of the amount of traffic is not a small-town.

Furthermore, with the increased frequency in what was once called a 100 year flood, this plan would most likely put contaminants in the river. They speak of drainage and storage, however if a 500 year flood level were to come through these systems would fail.

The impact on small town character, impact on pedestrians and bikers, and impact on infrastructure were not sufficiently addressed int he presentation.

In all, the plan fails to maintain small town character, it fails to account for the increased load in infrastructure and the impact of that, and it further fails to consider the impact on pedestrians and cyclists, the safety of pedestrians and cyclists, as well as the safety of drivers not he road.

Sincerely,
Kenneth McNeill
Samantha Ghosn

Jason Rogers

From: K Natarajan <kris.natarajan@gmail.com>
Sent: Wednesday, March 30, 2022 6:03 PM
To: Gwyn Berry
Cc: Jason Rogers
Subject: Snoqualmie Mill Planned Commercial/Industrial Plan PCI-2017-0001

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March 30, 2022
City of Snoqualmie
Office of the Hearing Examiner
Ms. Sharon A. Rice
c/o Gwyn Berry
Transmitted electronically on March 30, 2022 to Gwen Berry (via gberry@snoqualmiewa.gov) of the City of Snoqualmie

RE: Snoqualmie Mill Planned Commercial/Industrial Plan PCI-2017-0001
Dear Ms. Rice,
I am writing to alert you of my intention to submit comments on the above referenced project application **before the April 1, 2022 5pm PDT deadline** mentioned during this afternoon's City of Snoqualmie public hearing on this very matter.
As I have been working in California (at my company's head office) since this past Monday morning, and will not return home to Snoqualmie until next week, I unfortunately require some additional time to compile my feedback on the aforementioned project application.

I would ask that my forthcoming comments, upon your electronic receipt, become entered into the public record and moreover carefully reviewed and considered in good faith as part of your formal deliberations in your capacity as Hearing Examiner for this extremely concerning matter.
Many sincere thanks, in advance, for your kind consideration.
With best regards,
Kris
Kris Natarajan, Sc.M.
7720 Greenridge Ct SE
Snoqualmie, WA 98065

Jason Rogers

From: monica lowney <monicalowney14@yahoo.com>
Sent: Wednesday, March 30, 2022 6:46 PM
To: monicalowney14@yahoo.com; Gwyn Berry
Subject: Millsite Permit Application Written Comment March 30th, 2022

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City of Snoqualmie
Jason Rodgers Interium SEPA Rep
Deb Estraea- City Clerk
38624 SE River St
PoBox 38624
Snoqualmie, WA 98065
C/O Gweyn Berry:
Snoqualmie Millsite Permit :

I am writing as a community advocte in response to the proposed development plan for the Snoqualmie Millsite. These concerns are based on the decades of contamination of solvents, coolants, PCB oil, petroleum hydrocarbons, creosote and toxic coal dust that has been disposed of at the site for nearly a century. This may not include all contaminants at this location, so further testing and sampling of soil is needed.
In August of 2021, Department of Ecology's (DOE) made the determination of listing this site on the "known and suspected hazards list", ranked at a level 1 out of 5, 1 being the most contaminated. This assessment ranks the site as amongst the most contaminated sites in the state of Washington.

I understand the Department of Ecology has plans to move forward with a full Remedial Investigation, including sampling and further investigation of potential contamination. It is imperative the site, in it's current condition, is not approved for development until DOE has had an opportunity to conduct a full investigation. A DOE Site Manager has yet to be determined or assigned to this site. This site is currently in early stages of the independent clean phase. Once the remedial investigation is complete, a plan of action will be agree to amongst the parties involved and potential clean up will begin. The developer is currently in the second stage out of 8 stages to compleate the Site Hazard Assesment with DOE. This can take many years moving forward as DOE is lacking funding and staff at this time. Yet, DOE has no authority to stop the development from moving forward if approved prior to these remedial steps taking place.

I beleive chemicals discovered at this site by DOE and EPA need to be sampled from the North drinking water well which is near the site and the main drinking water source for residents. Disturbing this potential contamination through the development process can be devastating to the quality of the ground water. This is a concern for residents and nearby communities who all rely on underground well water. Underground aquifers are like underground rivers that usually connect and flow downstream.

Constructing a new stormwater system, which is necessary for Phase 1 of the development to occur, requires King County approval. As of yet King County has not approved a new stormwater system and expressed discontent in a recent letter. I will attach the recent letter of concern from King County below which is public information.

Traffic impacts are also of grave concern as studied and noted by Gary Norris with DN Traffic. He is a longtime certified traffic engineer and commented on both the DEIS and FEIS pertaining to traffic. Unfortunately his concerns addressed in the DEIS were not properly addressed in the FEIS. Please refer to Gary's response to the FEIS for technical details. The FEIS has failed to use current traffic data to justify the expansion and growing traffic flows on the roadways. Many trucks are expected to be brought into the community for this development. Two small bridges with limited weight capacities will be negatively impacted. Snoqualmie uses two very old bridges which are in need of expansion and reinforcement to accomodate this development. These bridges were not designed to withhold the amounts of traffic or truck weight to accommodation this development. Both bridges reside over the Snoqualmie River above the Snoqualmie Falls. One of these two bridges is a one lane and one way bridge only. The other bridge is near the Snoqualmie Falls Tokul Round About. The bridge has once fallen into the river in the past. Taking future construction of the site into account, I am concerned these bridges will not be able to handle future traffic flows. The bridges will need monies invested to meet future growth. Yet this information on how these bridges will be replaced

and or expanded or reinforced has not been fully outlined. Nor how these improvements will be funded and who will absorb this expense.

I have concern for the nearby Snoqualmie River and the ecosystem and aqua life impacts. A nearby Salmon hatchery is located nearby and downstream from the falls and this site. This can have very negative impacts on sal mon and other aqualife in the Snoqualmie River. The Snoqualmie River is connected to the top of the Snoqualmie Water Shed which flows to Pueget Sound. The development site is located in a flood zone and wetlands that is very sensitive to the ecosystem. Plant, aqua life and wildlife all depend on this river as a clean water source. It would be best for the environment if DOE was more involved with the current Remedial Investigation prior to development taking place. This would ensure environmentally sensitive areas were protected.

If the soils containing contaminants are disturbed by construction activity, prior to the full remediation of the cleanup, contaminants may be released into the river and ground water. We understand the Snoqualmie community relies entirely on ground water as their drinking water source. The North Well, which is near this development is the main supplier of drinking water in the community.
The concern is that benzene, PCB's, solvents, coolants and other Forever chemicals like creosote used in the mill operation, could p[ossible seep down into into the drinking water supply. This can have a long-term negative impact on the health of the residents living in Snoqualmie. Especially pregnant women and young children as the exposure limits are increased due to size and sensitivity. The cumulative impact over time can greatly impact human health.

We would like to express our concerns and reiterate our desire that this development be appealed successfully, and construction does not take place. Once these forever chemicals like PCB's are released into the environment, they are extremely hard, if not impossible, to remove.

We understand the storm water system is also connected to a nearby pond called Borst Lake. Underground contaminants may also be released through construction and drain out to Borst lake and eventually to the Snoqualmie River. There is an existing weir and culvert which drains water directly into the Snoqualmie River from Borst Lake. It is imperative we protect our rivers and drinking water supplies as they are all connected.

Communities downstream from Snoqualmie will also be negatively impacted. Fall City is directly downstream and a nearby fish hatchery in between Snoqualmie and Falls City exists. The State of WA recently invested millions of dollars to expand and renovate this fish hatchery. We have serious concerns pertaining to the direct impacts this development may have on future aqua life.

This development is very large in nature and large amounts of storm water runoff will be generated. Parking lots and petroleum products will eventually flow to the Snoqualmie River as a result. These impacts to the river have not been fully studied and vetted. At this time King County has not approved an updated storm water plan system to accommodate this development. The current storm water system is not effective and is outdated. The current system consists of multiple dirt ditches that flow throughout the site and underground leading to Borst Lake. This small lake flows out to the Snoqualmie River.

It is well known the Snoqualmie Mill site has had contamination issues well publicized for many years. This site was supposed to remain undeveloped and was listed as a Brown site by EPA in the 1980's. This occurred prior to Department of Ecology taking over jurisdiction of the site from EPA. Since this time, minimal clean up and investigation and sampling have occurred. We urge you to consider the negative impacts the what environment will possibly be exposed to if the site is not fully vetted and remediated prior to development taking place.

The history of the old mill site remains as one of the largest mill sites of its time in the State of Washington. Our concern is the 250-acre multifunctional development will not benefit the community or the environment. The heavy truck traffic that will accumulate at the Interstate 90 and Highway 18 will create safety hazards on these already overburdened roads. Inadequate information and analysis of traffic, flooding, light and sound pollution, and contamination concerns are present. The Final Environmental Impact Study fails to address these concerns and independent third-party consultant concerns have not been addressed from the DEIS.

We believe DOE should have the opportunity to first address the contamination issues which are well documented on their website. In addition to identifying the issues above, full clean up and remediation of the 250-acre site should be complete prior to any consideration of development taking place.
I beleive the new WA law called the HEEL Act which stands for "Healthly Environment for All Act" as well as Title 6 of the Civil Rights Act should be taken into consideration. Humans and wildlife including our ecosystem deserve the right to be protected. Thank you so much for your concern and time in this important matter. I also incorporate by reference in my comments the submittals of the Snoqualmie Community Action Network on March 30th 2022.

Sincerely,
Monica Lowney

Monicalowney14@yahoo.com

Jason Rogers

From: Auryel van Gemert <auryelross@hotmail.com>
Sent: Wednesday, March 30, 2022 7:31 PM
To: Gwyn Berry
Subject: Snoqualmie Mill Planned Commercial/Industrial Plan PCI 17-0001

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

March 30, 2022
City of Snoqualmie
Office of the Hearing Examiner
MS Sharon A Rice
C/o Gwyn Berry
Transmitted electronically to gberry@snoqualmiewa.gov

RE: Snoqualmie Mill Planned Commercial/Industrial Plan
PCI 17-0001

My name is Auryel van Gemert, former President of the Snoqualmie Community Action Network and a current Climate Reality Leader for Al Gore's Climate Reality Project. I am a lifetime resident of Washington State and have lived in Snoqualmie for 5 years.

I would like to submit additional comments on the above referenced project application. I incorporate my comments in the submittals of the Snoqualmie Community Action Network (SCAN) on March 30, 2022.

"No citizen I know wants this development." I was inspired to add to my already submitted comments when this was said at the hearing tonight. It is true and I second this. I live in downtown Snoqualmie and the only people I have heard say they want this development are City of Snoqualmie officials – Matt Larsen, when mayor, Council members James Mayhew, Sean Sundwell (when in office) and Jolyon Johnson. Every friend and neighbor I know, from North Bend, Downtown Snoqualmie, the Ridge and Fall City, absolutely does not want this development to move forward and believes they have no voice in the process.

This development would forever change life in the Snoqualmie Valley. Our small-town way of life will be taken from all of us who love it. This is a development that will impact hundreds of homes and families within a very close proximity who have lived a life close to nature. Something like this will ruin 100's, if not 1000's, of community members chosen way of life.

I do not have a document reference, however there is an interlocal agreement between the City of Snoqualmie and King County agreeing that no development will impact surrounding rural areas with light or noise pollution. This development will impact the entire surrounding community with high levels of traffic, light and noise and displace or kill off the local wildlife including elk, bear, cougar and eagles at a minimum while urban wildlife would move in (addressed in the EIS).

Due to climate change and changes to Snoqualmie Falls, Fall City and downstream flooding issues are devastating. This development will damage the surrounding communities downstream and does not provide for enough mitigation or community input by those effected West of this development.

The DOE designates the site as having the highest level of contamination possible. We need to commit to a future that serves a greater good and considers heavily the impact of climate change on all of us. This site deserves care and remediation before any development can possibly be considered.

We have an amazing downtown that could be reinvested in and an abundance of green space to develop Eco tourism in an already heavily utilized community for outdoor recreation.

I ask that this and any development be put on hold until all environmental issues are resolved, and our rural community's voice is heard and allowed to thrive.

Respectfully,
Auryel van Gemert
8305 382nd Ave SE
Snoqualmie, WA 98065

Jason Rogers

From: Julie Lake <juliehlake@gmail.com>
Sent: Wednesday, March 30, 2022 8:14 PM
To: Gwyn Berry
Subject: My concerns were mischaracterized

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My concerns about the developer ignoring regulations, and the city ignoring their behavior, were mischaracterized by Jason Rogers in his response.
My point was the developer habitually flouted rules for years, and the City did not sanction them for years.
Thank you,
~Julie Lake

--
Julie H. Lake
PO Box 1748
Snoqualmie, WA
98065-1748
303-819-0096

Jason Rogers

From: Mary and Joe <maryjoe4813@gmail.com>
Sent: Wednesday, March 30, 2022 8:23 PM
To: Gwyn Berry
Subject: Mill site comments

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

Hi, Ms. Berry,

Thank you for the opportunity to comment on the Mill Site proposed development. I am sorry that the city staff have recommended approval of this project, as I believe it will decrease many aspects of Snoqualmie's character and quality of life, while providing few advantages to its citizens and neighbors. The proponent will be the primary beneficiary, and citizens will be left with a reduced quality of life, as well as paying for much of the infrastructure costs.

There are multiple conflicts with Comprehensive Plan policies in this proposal.

- 3.2.1: **improve the local job/housing balance**. The planned rental units in this proposal will be market rate apartments, $1,600–2,400/month, estimated a year ago. The jobs associated with the first phase of development include retail, restaurant and warehouse jobs, (low to moderate income jobs in Snoqualmie). Middle income (80–120% of the area median income) is needed to rent one of these apartments. Three low-income people could afford a one-bedroom, or five people could afford a 2 bedroom unit. By phase three of the development, there may be technical and office jobs that pay a median/middle income wage. Will they want a 12 year old apartment over a warehouse? This proposal will further exacerbate the City's present affordable housing shortage, create a need for other housing elsewhere, and increase commuter traffic.
- 3.3.4: **Apply zoning controls that limit uses with . . .lower wage jobs . . .particularly in the . . .Mill planning areas, including such uses as warehouses/distribution.** Phase one will be essentially warehouses, retail and food oriented businesses that pay less than the warehouse wage. These jobs will again worsen the City's job/housing balance, creating more traffic issues.
- 4.2.1: **Encourage innovative housing that helps promote City goals of affordability . .** .these rental units, above warehouses and businesses, will be affordable only to middle income earners, who are unlikely to work on site, as the warehouse/food/retail jobs don't pay enough. More traffic.
- 6.5: **Public health and property damage risk associated with flood and geologic hazard areas are reduced** . . .Most of the Mill Site is in the flood plain, and some in the flood way. Even if no net rise is achieved, it's not a good plan to build in the flood plain, and property damage risk is exacerbated when buildings, roads and infrastructure are built in the flood way. Housing above these buildings will leave a population of people cut off from emergency services during floods.

- 7.4.1: **Maintain land use designations and zoning to allow . . . housing types that match the jobs in the City and make it possible for people to live and work in Snoqualmie.** Low wage jobs and market rate apartments make it necessary for people to live elsewhere and commute into Snoqualmie, as many people presently do. This project will exacerbate that imbalance. More traffic issues.
- 8.1.3**: Ensure transportation improvements or strategies accommodate development impacts concurrent with that development, and prohibit development if it causes LOS's for transportation facilities to decline below adopted standards.**

  9.1.2: **Require the provision of essential capital facilities and services to meet adopted LOS standards and accommodate growth concurrent with development.**

9.1.3: **Require future development to bear a fair share of costs for planned capital improvements concurrent with development, to achieve and maintain the adopted LOS.** As I understand the traffic "plans" (although I don't believe the proponent's traffic baseline studies in their DEIS and FEIS are accurate) LOS levels will mostly remain acceptable (D or above) IF five new round-abouts are constructed, the 202 bridge is replaced by a 4-lane bridge, two lanes are added to 202 at the Parkway, the present Tokul roundabout is doubled to 2 lanes instead of one, and multiple other Parkway intersections are “reconfigured” or signaled. None of these improvements are presently funded, although some are in Snoqualmie's plans. The job/housing imbalance will greatly worsen traffic in all areas of the city and surrounding roads.Further, the primary access, Mill Pond Road, is one of the first 3 roads in King County to close during the mildest flood events. Snoqualmie citizens and neighbors shouldn't have to pay for infrastructure costs to subsidize this development, nor is it reasonable to expect present residents to live with greatly worsened traffic for the benefit of the developer. This is a poorly chosen site for this type of traffic-heavy development, where all the traffic has to cross the existing city--better to site it near the freeway in the first place. Traffic impacts will be felt by everyone in the City.

- I do not see any **park mitigation fees** as a condition of this development. Snoqualmie presently has a deficit of active sports fields within the city, and park mitigation fees for the 160 housing units should be contributing either park land and/or mitigation fees to help resolve this shortage.

As a neighbor to this project, I strongly hope that the city council will recognize this as a development that will create many fundamental issues for the city, and greatly damage the quality of life that we enjoy. At a minimum, the project at the Mill Site should be planned to address the City and downstream flood issues, affordable housing issues, job/housing balance issues, traffic generation and whole-site toxic clean-up issues that this proposal presents. Surely better alternatives exist that will make the City even more livable, fiscally sound, and environmentally healthy. I hope that you will take the time to find a better solution than leaving present residents to pay financially and by quality of life, for this present proposal.

Thank you for the opportunity to comment.

Mary Norton

Jason Rogers

From: Teresa Bechtold <teresa.bechtold@gmail.com>
Sent: Wednesday, March 30, 2022 10:07 AM
To: Gwyn Berry
Subject: Millsite: please don't grant

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

Hi Gwen,
Thank you for collecting comments. Please ask our city council to reject Snoqualmie Mill Ventures LLC's plans for the Millsite because they don't take account of the hazardous runoff and slide risk presented by their plans. Please also ask our city council to reject Snoqualmie Mill Ventures LLC's plans for the Millsite because they detract from Snoqualmie's largest tourist attraction: Snoqualmie waterfall! People from all over the world come to admire the waterfall's beauty and then spend money at our restaurants and shops. Let's not impair our long-term economic viability.

Kind regards,
Teresa