




COMMUNITY DEVELOPMENT DEPARTMENT

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DATE December 18, 2017
TO Richard Weinman, Weinman Consulting LLC
CC Tom Sroufe, Mac McInnis
FROM Mark Hofman, Community Development Director 
RE: Mill Site PCIP Environmental Impact Statement (EIS) - Scoping Summary Memorandum

INTRODUCTION AND PURPOSE

This memorandum summarizes public comments received by the City of Snoqualmie (City) during the scoping period for the draft Environmental Impact Statement (“EIS”) for the proposed Snoqualmie Mill Planned Commercial/Industrial Plan (PCIP) project. This scoping memorandum identifies reasonable alternatives, elements of the environment, and mitigation measures to be analyzed during preparation of the EIS. The EIS will assess existing conditions, identify probable significant adverse environmental project impacts, identify reasonable alternatives and their probable significant adverse environmental impacts, and discuss reasonable mitigation measures that would significantly mitigate impacts of the proposal and alternatives. The EIS will be available to the Planning Commission and City Council for their consideration during land use decision-making for development of the site. This process is being completed in compliance with the Washington State Environmental Policy Act (SEPA)¹. Although no formal response to the scoping comments is required, the City chose to prepare and forward this Scoping Summary Memorandum to provide a further record of the scoping process, provide a summary of the issues and comments raised during scoping, memorialize direction on the alternatives to be analyzed in the EIS, and provide a reference for scoping comment providers.

Scoping comments were received from the public between May 3, 2017 and May 24, 2017, including during the Scoping Meeting for the project on May 23, 2017. Information from public comments has been used to help inform the City in choosing the elements of the environment and alternatives to be evaluated in the State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS).

¹ SEPA is codified at Chapter 43.21C RCW, and SEPA Rules at Chapter 197-11 WAC; City of Snoqualmie SEPA procedures and policies are adopted consistent with State requirements by Chapter 19.04 of the Snoqualmie Municipal Code

BACKGROUND

The applicant submitted an application on March 22, 2017 seeking approval of a PCIP and a development agreement for the Snoqualmie Mill site. The Snoqualmie Mill site is located in the City of Snoqualmie, north of the Snoqualmie River and Borst Lake, and northeast of SE Mill Pond Road, and is a portion of a larger property that was operated as a lumber mill for almost 100 years. The proposed PCIP and development agreement would guide subsequent planning and future development of the overall site. The site has been divided into three distinct areas/phases for purposes of planning and permitting. The PCI plan application provides detailed information for Planning Area I/Phase I, an approximately 102- acre area in the northwestern portion of the site, and conceptual information for Planning Areas/Phases 2 and 3. Required building and development permits would be applied for following approval of the PCIP.

The City, as the lead agency under SEPA, determined that the proposal could result in significant impacts to the environment, and that preparation of an EIS is required.

THE SCOPING PROCESS

Scoping is the first step in the EIS process. During scoping, the range of proposed actions, alternatives, and impacts to be discussed in an EIS are evaluated. Scoping was initiated on May 3, 2017, in consultation with city and county agencies; affected tribes; regional, state, and federal agencies; interest groups; businesses; affected communities; individuals; and the public. The following activities were undertaken in support of and during the scoping process:

- Identified preliminary environmental issues to be addressed, and opportunities for public involvement.
- Released the Notice of Scoping (along with SEPA Determination of Significance [DS]) for the Mill PCIP Project) on May 3, 2017, describing the proposed project, initial consideration of alternatives, and elements of the environment to be assessed, and other permits and approvals required for the project. This Notice was available at the public open house, the agency scoping meeting, and on the City of Snoqualmie project web site. The DS/Scoping document was added to the SEPA Register on May 2, 2017.
- Published notice to the Snoqualmie Valley Record on May 3, 2017 and posted notice to the City's main webpage, both inviting public comment via email, mail, and at the scoping meeting.
- Posted notice of scoping comment period and meeting date/time on the project site in two locations prior to May 3, 2017.
- Sent notice letters by May 3, 2017, to adjoining property owners within a 500-foot radius of the exterior property lines of the project site to announce the beginning of the scoping process and the public open house. The Notice was also emailed and sent to known persons who had previously indicated interest in receiving such notices for the project.

- Sent notice letters to agencies, affected Tribes, and public or private groups with interest in the proposal on May 3, 2017, to receive comments to help define alternatives, environmental issues, and the environmental process.
- Reviewed approximately 50 written and oral comments made at the scoping meeting or received during the scoping period.
- Forwarded the record of all comments received by the City to the applicant after completion of the scoping meeting and the publicly-noticed scoping comment period.
- Prepared this Scoping Summary Memo to summarize the results of the public scoping process, identification of alternatives, elements of the environment, and mitigation measures for evaluation, and made the report readily available to the public.

The public scoping open house and comment was Tuesday, May 23, 2017, from 4:00 p.m. – 8:00 p.m. at Snoqualmie City Hall, 38624 SE River St, Snoqualmie, WA 98065.

The Draft EIS (DEIS) is anticipated to be published in Spring 2018. Opportunities for public involvement and input will continue throughout the environmental review process.

SUMMARY OF COMMENTS RECEIVED

This summary is an overview of comments received between May 3, 2017, and May 24, 2017, through oral testimony received at the scoping open house, emails and mailed comment letters. Approximately forty (40) people, other than staff and application representatives, attended the public open house. The focus of the open house was to obtain suggestions for alternatives for the project and elements of the environment to be included in the EIS.

A total of approximately 50 comment letters and oral comments were received during the scoping period ending May 24, 2017, excluding duplicates. Comments generally addressed concerns specific to proposed design elements of the project or larger concerns for the project as a whole, rather than addressing the scope of the EIS or alternatives to be evaluated therein.

The City may receive additional comments related to the Mill Site PCIP and EIS after the scoping period and prior to DEIS publication; any such comments would not be included in this summary.

PROJECT CONCERNS

The dominant theme of both the comment letters and oral testimony was traffic/ transportation issues that could be associated with development of the Mill Site. Other major concerns included: the presence of hazardous materials on-site from previous site activities, concern over risk of flooding, flood storage and stormwater run-off; the presence of threatened and endangered species; water resources and availability; and the presence of historical and archaeological resources on-site. A wide variety of other comments were expressed regarding invasive species on-site, recreation opportunities for

pedestrian and bike access and trail connectivity; community character and the design/scale of buildings; geological hazards; economic impacts to local businesses and existing site users; air quality impacts; light pollution and effect on bird populations; land and shoreline use; and consistency with the comprehensive plan. Both advocates and opponents of the project expressed concerns regarding the proposed amphitheater, particularly increased traffic and noise and potential safety issues that could be associated with an amphitheater in the area.

A number of comments questioned the community need for the project as a whole, the phasing of the project and other topics unrelated to the SEPA process.

EIS OBJECTIVES AND ALTERNATIVES

SEPA requires that an EIS analyze at minimum two alternatives: the proposal and a No Action Alternative. In addition, one or more additional “reasonable alternatives” must be considered that are feasible and that meet the proposal's objective at a lower environmental cost. In addition to the No Action Alternative, this EIS will include two action alternatives. The City and applicant have developed a “PCIP Application Alternative”, and an “EIS Alternative”. The PCIP Application Alternative is substantially represented in the Mill Site PCIP application materials submitted to the City in April 2017, with minor adjustments as described below.

The objectives are as follows:

- Identify one or more reasonable EIS alternatives, in addition to No Action, consistent with SEPA requirements (WAC 197-11-440(5)). An alternative should be able to feasibly attain a proposal’s objectives at reduced environmental cost, on the same site. It should also be consistent with the Comprehensive Plan and zoning.
- Relevant court decisions do not interpret the SEPA rules as requiring that an alternative result in all impacts being lower than the proposal. Reduced impacts to one or more elements of the environment are sufficient to demonstrate trade-offs and achieve the purpose of an alternative.
- Use the alternative(s) to demonstrate potential “real world” trade-offs among project elements and outcomes, not a straw man scenario. Keep it as simple as possible within the purpose of an EIS alternative.

ALTERNATIVES

1. No Action Alternative: In this alternative, the proposed action would not occur, and the site would remain as it presently exists with its current use(s). This alternative is required to be analyzed under the State Environmental Policy Act, Chapter 43.21C RCW, and its implementing rules, Chapter 197-11 WAC.

2. **PCIP Application Alternative:** This alternative would be substantially similar to the submitted PCIP application, with the exception of the outdoor performance space. The outdoor performance space would be eliminated in this alternative at the request of the applicant.

3. **EIS Alternative:** Compared to the PCIP Application Alternative, this alternative would increase warehouse use and have an outdoor performance space similar to the original PCIP application; and reduce the events center and light industrial, campus/office, retail/restaurant, and residential uses. Total development amount (square footage) and site coverage would remain approximately the same. Development in Planning Areas 1 and 2 would be slightly less than the PCIP Application Alternative (approximately 16,000 sf for Planning Area 1 and 10,000 sf for Planning Area 2), while development in Planning Area 3 would be slightly more than the PCIP Application Alternative (approximately 48,000 sf). The general footprint of the Planning Areas would remain the same. Changing the land use mix to emphasize warehouse would reduce total employment, which is anticipated to reduce impacts to transportation, water consumption, public service demands and several other elements of the environment. Including the outdoor performance space is anticipated to increase impacts to transportation, noise and other elements of the environment.

PCIP Application Alternative

Land Uses	Planning Areas			Site Totals
	1	2	3	
Warehouse/Manufacturing	280,000	400,000	0	680,000
Light Industrial	120,000	0	0	120,000
Retail/Restaurant	70,000	0	25,000	95,000
Residential (Mixed-Use)	134,000	0	0	134,000
Office/Campus	0	0	800,000	800,000
Outdoor Performance Space	0	0	0	0
Total	604,000	400,000	825,000	1,829,000
Building Area	13 acres	9 acres	19 acres	41 acres
Open Space	67 acres	29 acres	71 acres	167 acres
Roads/Other Impervious	22 acres	18 acres	14 acres	54 acres
Total Area	102 acres	56 acres	102 acres	261 acres

Note: Figures are rounded.

EIS Alternative

Land Uses	Planning Areas			Site Totals
	1	2	3	
Warehouse/Manufacturing	291,000	390,000	715,000	1,396,000
Light Industrial	96,000	0	0	96,000
Retail/Restaurant	97,000	0	0	82,000
Residential (Mixed-Use)	104,000	0	0	104,000
Office/Campus	0	0	156,000	156,000
Outdoor Performance Space	0	0	2,000	2,000
Total	588,000	390,000	873,000	1,851,000
Building Area	13 acres	9 acres	20 acres	42 acres
Open Space	67 acres	29 acres	70 acres	166 acres
Roads/Other Impervious	22 acres	18 acres	14 acres	54 acres
Total Area	102 acres	56 acres	102 acres	261 acres

Note: Figures are rounded

ENVIRONMENTAL ELEMENTS & IMPACT ANALYSIS

The following summarizes the elements of the environment that will be evaluated in the EIS based on comments received during scoping and experience on similar projects. The analysis in the EIS will be based on existing studies and information where available. In some cases, a qualitative analysis is sufficient to identify the impacts, while in others, more detailed and quantitative analysis will be required.

HAZARDOUS MATERIALS / TOXICS CONTAMINATION

- Complete a technical evaluation and identification of known industrial contamination and past clean-up actions across the project site, which is listed with two clean-up site identification numbers by the Department of Ecology (Cleanup Site IDs 2049 and 10346).
- Identify remaining contaminants of concern that are above clean-up levels established by Ecology.
- Consult with the Washington State Department of Ecology to develop a clean-up action plan for the site as necessary to meet Model Toxics Control Act (MTCA) requirements.
- Develop mitigation during design and construction that would ensure that workers, future site users and ecologic receptors are protected from potential release of known contaminants.
- Consider contaminants within the adjacent Mill Pond Site in the context of potential impacts on project alternatives within the Mill PCIP site (note: The Mill Pond site is under separate ownership and is not a part of Snoqualmie Mill Ventures' PCIP project application being analyzed in the EIS).

EARTH

On-site Impacts

Provide geotechnical assessment of:

- Increased risk of slope and/or soil instability from any anticipated construction techniques, including assessment of site settlement potential.
- Increased risk of slope and/or soil instability due to changes in hydraulic conditions, additional loading, and/or excavation and fill.
- Potential risk due to seismic activity.
- Provide a qualitative assessment of: risk of increased flooding, erosion, or site instability due to increases in winter precipitation and storm severity in the future due to climate change.
- Potential risk due to nature of fill on the site.

Off-site Impacts

- Provide a qualitative assessment of: risk of erosion, siltation, and sedimentation downstream including potential impacts to off-site wetlands and streams.

AIR

- Complete an Air Quality and greenhouse gases (GHG) Technical report, including review of construction impacts and analysis of vehicle tailpipe emissions potential.
- Assess the potential for project-related airborne pollutants from automobiles and wood-burning devices to cause air quality standards to be exceeded on or near the site or within the Snoqualmie region.

WATER

On-site

Quantify changes to surface and subsurface flows on the site due to construction and occupancy of the project, including:

- Effects of tree and vegetation removal and new impervious surfaces on infiltration and runoff rates during both wet and dry seasons.
- Effectiveness of the proposed stormwater retention/detention systems in both dry and wet seasons, and during storm events that exceed the intensity of the design storm.
- Effects on perched and deep groundwater.
- Effects of excavation for wetland creation on stream flows during wet and dry seasons.
- Determine potential water quality impacts from development of the site, including:
 - Qualitative assessment of the efficacy of proposed wetland buffers in preventing pollutants from reaching wetlands and other surface waters
 - Qualitative assessment of potential turbidity impacts during construction and during major storm events
 - Quantitative assessment of the effects on water temperature in wetlands
 - Quantitative assessment of the anticipated effectiveness of the proposed stormwater treatment systems in removing pollutants in both dry and wet seasons, and during storm events that exceed the intensity of the design storm

- Qualitative assessment of need for and impacts of long term maintenance necessary for effective operation of the stormwater facilities

Off-site

- Provide a qualitative assessment of surface water quality and quantity and associated off-site wetlands that would result from construction or long-term impacts of the project.
- Provide a qualitative assessment of potential surface water quality impacts from surface water runoff originating on the project site.
- Provide a qualitative assessment of any increased risk of off-site flooding due to increased impervious surfaces on the project site.

FLOOD HAZARDS

- Complete technical evaluation of flood hazards and development approach consistency with floodplain development standards and City Flood Hazard Regulations.
- Completion of a “no net rise” analysis consistent with City regulations.

PLANTS AND ANIMALS

- Complete critical areas study for streams, wetlands, floodplain and fish & wildlife habitat areas consistent with City requirements; assess impacts and proposed mitigation for critical areas.
- Provide a qualitative assessment of general habitat conditions, diversity of plant and animal species, and importance of the site to wildlife in the city and region.
- Document any species known or likely to be present on or near the site that are listed on federal threatened or endangered lists, and any species of concern included on Washington Department of Fish and Wildlife’s priority species list, including any candidate species.
- Identify types, locations, and quantities of invasive species.
- Provide a qualitative assessment of impacts on ecological functions including migratory corridors, food chains, and nutrient cycling due to construction and occupancy of the development, including impacts from:
 - Construction noise.
 - Vegetation removal.
 - Increased lighting.
 - Changes to water quality.
 - Changes to surface and subsurface water flow rates.
 - Habitat fragmentation.
 - Introduction of non-native plant species and artificial habitat types such as lawns.
 - Potential effects of imported soil on native plants.
 - Introduction of domestic animals (cats and dogs).

NOISE

- Assess potential construction noise impacts taking into consideration:
 - Any elevated noise levels anticipated
 - Construction duration.

- Proximity to adjacent residences.
 - Efficacy of structures and remaining vegetation to reduce noise levels off-site.
- Assess potential post-development noise impacts taking into consideration:
 - Increased traffic noise.
 - Tourist, amphitheater, and amplified noise/music.
 - Efficacy of structures and remaining vegetation to reduce noise levels on adjacent properties.
- Complete a Noise Technical Report consistent with FHWA and WSDOT for new and/or expanded roadways.

RECREATION

- Assess impacts on the level of service for public recreational facilities, relative to goals established in the Comprehensive Plan, and taking into account recreational facilities proposed to be constructed as part of the project.
- Provide a qualitative assessment of potential impacts on the enjoyment of adjacent public recreation lands, including aesthetics and noise impacts from the project.

TRANSPORTATION

- Complete a Traffic Impact Analysis (TIA), including additional details on impacts to Meadowbrook Bridge and Mill Pond Road, and other applicable network roads.
- Adverse effects on emergency response times.
- Assess potential transit ridership, specifically whether there are any impediments to transit use presented by the site design, and whether the site is conducive to scheduled fixed-route transit service (e.g. Metro route 208) or Community Connections (e.g. Snoqualmie Valley Shuttle).

LAND USE

- Evaluate consistency with state and local land use policies and regulations in force on the date of application, including the updated Shoreline Master Program (adoption anticipated in 2018) and associated shoreline designations and standards.

AESTHETICS

- Provide a qualitative assessment of visual and aesthetic impacts of site development on the immediate neighborhood and scenic routes.
- Provide a qualitative assessment of potential light and glare impacts from vehicles, parking areas, and housing development on adjacent uses.

CULTURAL AND HISTORIC RESOURCES

- Work with the Department of Archaeology and Historic Preservation (DAHP), interested Tribes, the Japanese Cultural & Community Center of Washington, the Snoqualmie Valley Historical Museum, Weyerhaeuser and others, as appropriate, to obtain relevant historic and cultural resources information.
- Determine whether the proposal or any alternatives may have any impacts on any historic and cultural resources, and if so identify the impacts.

- Complete a cultural resources assessment consistent with DAHP requirements;
- Complete archaeological monitoring plans and cultural resource management plans.
- Complete and submit archaeological site inventory forms to DAHP, incorporate Smithsonian trinomials.

PUBLIC SERVICES

- Provide an assessment of the following services and utilities:
 - Firefighting and emergency medical aid.
 - Adequacy of access.
 - Need for special equipment.
 - Estimate additional demand for personnel.
- Police:
 - Estimate additional demand for personnel.
 - Evaluate whether design supports or inhibits crime prevention.
- Schools
 - Estimate the number of new students anticipated.
 - Determine whether school system has will have adequate capacity for the additional students from the Snoqualmie Mill Site development.

UTILITIES

- Identify public utility systems that would be utilized by the project.
- Analyze water supply and sewer capacity and potential constraints.
- Determine whether there is adequate capacity to accommodate the increased load on the utilities (including domestic water and sewer).

For all elements listed the EIS will describe the existing conditions, the potential impacts from each of the alternatives, and mitigation measures that could be implemented if the project were to be approved.

ORGANIZATION SCOPING COMMENT PROVIDERS

Name	Organization
Gretchen Kaehler	Washington State Department of Archaeology and Historic Preservation (DAHP)
Matt Baerwalde	Snoqualmie Tribe
Chris Regan	Washington State Department of Transportation (WSDOT)
Doug Gresham	Washington State Department of Ecology (Ecology)

CITIZEN SCOPING COMMENT PROVIDERS

Name
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Jim Simon
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Sarah Wheatley
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Kristin Cernak
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Rob and Ashleigh McCann
Mike Akers
Suzy Berger
Mary Norton
Elizabeth Greenhaw
Elaine Armstrong
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