SNOQUALMIE MILL PCI PLAN

Final Environmental Impact Statement

City of Snoqualmie | December 2021

COMMUNITY DEVELOPMENT DEPARTMENT

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December 9, 2021

RE: Snoqualmie Mill Planned Commercial/Industrial Plan Final EIS

Dear Agencies, Tribes, Organizations, and Interested Parties:

The Final Environmental Impact Statement (Final EIS) for the proposed Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan (the Proposal) is issued as of the date of this letter. The Final EIS was prepared in compliance with State Environmental Policy Act (SEPA) requirements, and provides a reasonably thorough discussion of the significant aspects of the probable, significant adverse environmental consequences associated with the Proposal. The Final EIS responds to comments received on the Draft EIS, makes minor editorial changes to existing Draft EIS text, provides some updated information and analysis, and includes additional mitigation measures. The Final EIS's purpose is to facilitate the decision-making process for the PCI Plan. Accordingly, the Final EIS is not require to and does not list every remote, speculative, or possible effect or alternative, evaluate every scenario or conduct a worst case analysis.

The 261-acre Snoqualmie Mill site, located in the City of Snoqualmie and now owned by Snoqualmie Mill Ventures LLC (SMV, the applicant), was operated as a lumber mill by the Weyerhaeuser Company for almost 100 years. (The adjacent Mill Pond/Borst Lake is not owned by the applicant, is not part of the Snoqualmie Mill site, is not included in the PCI Plan, and is not addressed in the EIS.)

The City and SMV entered into a Pre-Annexation Agreement in 2011, and the property was annexed to the City in 2012 and designated for commercial and industrial uses. A Post Annexation Implementation Plan, required by the City's Comprehensive Plan, was approved by the City in 2016. SMV submitted an application for PCI Plan review in April 2017. The EIS, composed of both the Draft EIS published in April 2020 and this Final EIS, has been in preparation and review since that time, and will accompany the PCI Plan application through the land use review process. PCI Plan approval, if granted, would not by itself authorize any physical construction on the Snoqualmie Mill site; it is a type of plan/land use approval required by the Pre-Annexation Agreement, the Snoqualmie Comprehensive Plan and the Snoqualmie Municipal Code; it would enable the applicant to submit an application to physically develop the property.

The EIS analyzes three alternatives: (1) the Snoqualmie Mill Proposal; (2) the "Redevelopment Alternative"; and (3) the "No Action" Alternative.

The Snoqualmie Mill Proposal would redevelop the site in three phases (Planning Areas), over an approximate 10- to 15-year period. 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. Planning Area 1, which is in the western portion of the site, would be developed in the near term; it is the focus of the detailed analysis in the EIS. Planning Area 1 would develop with 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. In addition, 160 units of multi-family housing would be developed in upper floors of a mixed-use building in Planning Area 1. 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. Approximately two-thirds of the Snoqualmie Mill site would be maintained

as open space devoted to natural areas, habitat, trails, and flood storage. The EIS indicates that buildout of Planning Area 1 the Snoqualmie Mill PCI Plan would have net positive economic benefits, with an estimated $7.4 million net benefit for the City, and a full buildout of all three planning areas would have an estimated $32.3 million net benefit.

Another alternative analyzed in the EIS, the Redevelopment Alternative, focuses on a different mix of proposed uses. It emphasizes manufacturing and light industrial uses throughout the site, reduces residential units, and eliminates office uses in Planning Area 3 but adds an outdoor performance venue. The EIS No Action Alternative addresses potential impacts if the Snoqualmie Mill site is not further developed and current uses continue unchanged. The Final EIS also describes several additional alternatives that were considered but not analyzed in detail.

The overall Snoqualmie Mill site is considered to be a "brownfield" site, with some legacy 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 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.

The EIS evaluates the direct, indirect, and cumulative impacts associated with the three alternatives. The EIS also identifies mitigation measures and significant impacts that are unavoidable. Broad areas of analysis contained in the EIS include the following:

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
		Fiscal/Economic Impacts

The Final EIS, as well as the Draft EIS, is available for review or download on the City's website https://www.snoqualmiewa.gov/393/Mill-Property. A thumb drive containing the Final may be purchased for a cost of $7.48. A paper copy may be ordered directly from the printer for the cost of reproduction (approximately $150 for the Final EIS itself, not including appendices). Please contact the City for additional information about printed copies.

Pursuant to Snoqualmie Municipal Code Section 19.04.235 and Ordinance No. 1235, the Final EIS is subject to administrative appeal by an agency or person with standing. The timing, procedures and other requirements governing SEPA administrative appeals and related hearing procedures can be found in Ordinance No. 1235 and SMC Sections 14.30.080, 19.04.235 and Ch. 2.14 SMC.

For further information or additional assistance, please contact either of us at the contact information below. Thank you for your interest.

Sincerely,

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Fact Sheet

Project Title

Snoqualmie Mill Planned Commercial/Industrial (PCI) Plan

Proponent (Applicant)

Snoqualmie Mill Ventures, LLC

Location/Background Information

The project site is located in the City of Snoqualmie, WA. 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 (not part of the project site), which is owned by King County, along 396th Drive SE, on the east. The site is located within Sections 29 and 30 of Township 24, Range 8 East, W.M. Refer to Exhibit 2.1-1. Other nearby features and uses include the Snoqualmie River on the west, and the City's wastewater treatment plant and an existing gravel mining operation to the north. The Mill Pond/Borst Lake is not owned by the applicant and is not part of the proposed action.

The project site was operated as a lumber mill by the Weyerhaeuser Company between 1917 and 2003. It contains numerous industrial buildings and remnants from those operations. The remaining buildings, generally located in the north-central and eastern portions of the site, are in various states of disrepair; space in several buildings determined to be structurally sound is leased to commercial tenants. The Mill Powerhouse, located on the southeastern portion of the site, is a designated King County Historic Landmark. Portions of the site are also used as a driving track by the DirtFish Rally School.

The Mill site was annexed to the City in 2012, with the exception of a 15.7-acre parcel in the northwestern portion of the site that remains in unincorporated King County. The City Council approved a Post Annexation Implementation Plan (AIP) for the site in 2016. The applicant submitted a complete PCI Plan application to the City in March 2017 and agreed to prepare an Environmental Impact Statement (EIS) pursuant to the State Environmental Policy Act (SEPA).

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. A Draft EIS was published on April 27, 2020. 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.

Proposed Action

The applicant is seeking City approval of a Planned Commercial Industrial (PCI) Plan and a development agreement for the Snoqualmie Mill site. The proposed development agreement will provide additional details and processes to guide subsequent planning and development of the overall site in accordance with the PCI Plan. Applications for building permits and other

required development approvals will be submitted following approval of the PCI Plan.

The Draft and Final EIS documents address 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. When fully developed, the site could generate approximately 3,410 jobs. Nearly 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.

Planning Area 1, the first phase of development, would contain 604,000 sf of development, including 160 residential units in mixed-use buildings, developed along a pedestrian-oriented village street. 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. Construction of Planning Area 1 could commence in 2022 and be completed by 2023. The timing of development, particularly of subsequent phases (Planning Areas 2 and 3), would depend on market interest, economic conditions, identified infrastructure requirements, and the timing of additional planning, design, and/or environmental review.

Alternatives

Two alternatives have been developed for analysis in the EIS based on SEPA requirements and the applicant's stated project objectives: the No Action Alternative and a Redevelopment Alternative. Three additional alternatives were considered in the Final EIS but were not carried forward for detailed analysis.

No Action Alternative. SEPA requires that an EIS include a No Action Alternative. For the Snoqualmie Mill PCI Plan EIS, "no action" means that the proposed PCI Plan would not go forward, and the City would not act on the Proposal. Since City policies and regulations require approval of a PCI Plan as a prerequisite for redevelopment, no redevelopment would occur. Existing on-site uses would continue indefinitely, as permitted by a previously approved Pre-Annexation Agreement. The No Action Alternative in the EIS primarily serves as a baseline against which the Proposal and other alternatives can be measured.

Redevelopment Alternative. The Redevelopment Alternative includes 1.85 million sf, almost the same as the Proposal, but with a different land use mix and emphasis. Open space and building/impervious site coverage would be comparable to the proposed PCI Plan –63% and 37%, respectively. Building layout in Planning Area 1 would be comparable to the proposed PCI Plan. Holding the development amount, site coverage, and sequence and timing of development constant is intended to help focus on the environmental effects of changes to land uses.

Land use would be predominantly warehouse; combined with manufacturing and light industrial use, these land use categories would comprise 80% of total development, compared to 44% for the PCI Plan. Compared to the proposed action, retail and office uses would be

reduced, and a larger indoor event space would be developed. Residential uses would be less than the proposed PCI Plan. Compared to the proposed PCI Plan, total development in Planning Area 1 would be less and development in Planning Area 3 would be somewhat greater.

The Redevelopment Alternative includes an outdoor performance space in the southeastern portion of Planning Area 3. It assumes approximately 3.7 acres of landscaped open space with a constructed stage (2,000 square feet), with capacity for approximately 5,000 people. An average of two performances per week, from June through September, are assumed for purposes of analysis. The stage would be the only permanent structure. The outdoor performance center is not included in the proposed action.

The Redevelopment Alternative would generate approximately 42% fewer jobs compared to the proposed PCI Plan – 1,570 compared to approximately 3,410 jobs for the Proposal.

Required Permits & Approvals

The following list of governmental permits and approvals is preliminary and identifies the range of known and potential permits that will ultimately be required to approve and to construct the Proposal. The PCI Plan is a prerequisite for any subsequent development permits from the City.

City of Snoqualmie

Land Use Approvals

- Planned Commercial/Industrial (PCI) District Plan
- Development Agreement (Overall PCI Plan & Phase 1 PCI Plan)
- Conditional use permits (PCI Plan Phase 1 residential uses, and restaurants/tasting rooms)
- Deviations from specific dimensional standards (PCI Plan Phase 1 building height and individual wetland buffer widths)
- Wetland buffer restoration and enhancement plan (PCI Plan Phase 1 buffers)
- Comprehensive Plan amendment/sewer and water plan updates (possible)

Subsequent Development Approvals

- Flood hazard permit (Phase 1)
- Building permits (for Phase 1)
- Civil engineering plan review (for PCI Plan Phase 1)
- Sewer and water connection permits (for PCI Plan Phase 1)
- Shoreline substantial development permit (Phase 1)
- Boundary Line Adjustment (future separate application)

State and Federal

State of Washington

- Hydraulic Project Approval (HPA)
- Construction Stormwater General Permit
- Clean Water Act Section 401 Water Quality Certification
- Winery General Permit (potential)

Federal (potential)

- Clean Water Act Section 404 permit (possible)
- Letter of Map Revision (possible)

Lead Agency/Responsible Official

City of Snoqualmie Community Development Department
Mark Johnson, Environmental Science Associates (ESA), Interim SEPA Responsible Official

Location of Background Information

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- EcoNW – Fiscal & Economic Impacts
- Farallon Consulting – Site Remediation, Environmental Health
- Fehr & Peers – Transportation Modeling
- Goldsmith Engineering – Stormwater, Flooding, Utilities
- Raedeke Associates – Plants, Animals, Fisheries
- Ramboll – Air Quality, Greenhouse Gas Emissions, Noise
- Transportation Engineering NW – Transportation
- Watershed Science & Engineering (WSE) – Flood Modeling

Type & Timing of Subsequent Environmental Review

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)). This EIS evaluates the proposed PCI Plan for the entire Snoqualmie Mill site at varying levels of detail, according to the level of planning that has occurred for different portions of the site. More detailed information has been developed for Planning Area 1, which is analyzed in greater detail. In contrast, planning for Planning Areas 2 and 3 is more general and conceptual at this time, and these portions of the site are evaluated at a more programmatic level of detail. Following approval of the PCI Plan and based on submittal of development permit applications for Planning Area 1, the City will make a SEPA Threshold Determination for those proposed project actions (subsequent development permit applications) using this EIS, as provided by WAC 197-11-060(5)(f). As stated in the EIS, additional environmental review will be performed for Planning Areas 2 and 3 when more detailed information is available.

Draft EIS Issuance Date

April 27, 2020

Final EIS Issuance Date

December 9, 2021

Document Availability & Cost

A Notice of Availability of the Final EIS has been distributed to agencies, tribes, organizations, and individuals as noted on the Distribution List (Chapter 5 of the Final EIS). The Final EIS can also be reviewed or downloaded on the City's website using the following link: https://www.ci.snoqualmie.wa.us/393/Mill-Site-Property.

A paper copy may be ordered directly from the printer for the cost of reproduction (approximately $150). Please contact the City for additional information about printed copies.

Digital copies on a USB drive may be purchased from the City for a cost of $7.48.

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1.0 Summary

INTRODUCTION TO THE FINAL EIS

Contents of and Changes in the Final EIS

This Final Environmental Impact Statement (Final EIS) is the second document in the sequence of documents that comprise the complete EIS. The primary function of a Final EIS is to respond to comments received on the Draft EIS from government agencies, tribes, organizations, and individuals. It also updates the Draft EIS to document any changes in the Proposal or alternatives; supplements the environmental analysis, where appropriate; and corrects errors in the Draft EIS.

Several chapters of the Final EIS contain minor changes (primarily editorial, grammatical, or typographical) from the same chapters in the Draft EIS, which are summarized here. The changes are generally intended to improve consistency of terminology and readability of the document, or to correct minor errors. These are summarized further below.

Chapters 1 and 2 of the Final EIS contain numerous non-substantive typographical, grammatical, and editorial changes to the description of the Proposal and alternatives. These include minor changes to terminology, correction of fractional numbers, and addition of references to the "Final EIS" or "EIS" as well as to the "Draft EIS." Some text has been added in a few places to reference issues (such as the removal of floodplain fill) that are addressed substantively in Chapter 3, Responses to Comments Received on the Draft EIS. Incorrect references to compass directions (e.g., north rather than south) were corrected. Because these are minor and not substantive, they are not otherwise marked in the text of the document. There is limited new information in these chapters as well.

Chapter 1, Summary, also contains a few new recommended mitigation measures related to cultural resources, fire service, and transportation (bicycle and transit). Chapter 2 contains a new subsection (Section 2.4) that describes three additional alternatives that were considered but not carried forward for detailed analysis. (The transportation analysis that was performed as part of the evaluation of the three additional alternatives considered generated traffic analysis datasheets that are contained in Appendix C of the Final EIS.) Documentation of supplemental testing and analysis of soil and groundwater in Planning Area 1 is included in Appendix B of the Final EIS and referenced in the Summary section on Environmental Health.

Chapter 3, Responses to Comments Received on the Draft EIS, is new and specific to the function and required contents of a Final EIS. Responses are categorized by issue and/or element of the environment, and each issue category is given a number. Appendix A of the Final EIS contains copies of all comment letters received on the Draft EIS. Each letter and each comment within each letter is numbered. Exhibits A-1 through A-4 provide a "road map" to help the reader identify the section in Chapter 3 that contains the associated response. The

transcript from the May 2020 public meeting is also included and follows the same numbering system.

A few additions are included in the References (Chapter 4) and Abbreviations (Chapter 5) to incorporate information contained in responses to some comments. The EIS Distribution List (Chapter 6) has been updated to include commenters on the Draft EIS.

The reader should note that this Summary chapter of the Final EIS provides a complete overview of the Proposal and of the environmental analysis contained in Draft EIS, but it is only a summary. It is selective and does not contain the entire detailed discussion nor all of the data in the Draft EIS. Readers looking for more than the overview a summary can provide are referred to the Draft EIS.

Additional information about the SEPA review process and subsequent permitting may be found in Section 1.2 below and the Final EIS Fact Sheet, respectively.

Note on Terminology

This EIS (including the technical appendices) uses the terms Proposal, proposed action, proposed PCI Plan, Snoqualmie Mill Proposal, or proposed project interchangeably. In the context of SEPA definitions, requirements, and procedures, there is no functional or substantive difference among these various terms. They all refer to a course of action that is being considered or that has been formally proposed by an applicant and imply the same scope and level of analysis.

1.1. PURPOSE OF PROPOSED ACTION

The proposed action is approval of a Planned Commercial/Industrial (PCI) Plan and a development agreement for the Snoqualmie Mill site. The Proposal is sponsored by Snoqualmie Mill Ventures, LLC, located at 240 Main Avenue S., Suite 107, North Bend, WA 98045. The project site is located in the City of Snoqualmie, WA. 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 on the west, and the City's wastewater treatment plant and an existing gravel mining operation to the north. The Mill Pond/Borst Lake is not owned by the applicant and is not part of the proposed action.

The proposed development agreement will help guide subsequent planning and development of the overall site. The proposed action also includes the approval of conditional uses (for residential and some commercial uses) and two zoning code deviations (for building height and for some individual wetland buffers).

1.2. STATE ENVIRONMENTAL POLICY ACT (SEPA) PROCESS

A PCI Plan application was submitted to the City on March 22, 2017 and was determined to be complete on April 19, 2017. The applicant's voluntary commitment to prepare an

environmental impact statement (EIS) for the Snoqualmie Mill project was included in the Post Annexation Implementation Plan (AIP) approved by the City and in the PCI Plan application.

The City, as lead agency for SEPA compliance, issued a combined Notice of Application and Determination of Significance/Scoping Notice on May 3, 2017. An open house and scoping meeting were held on May 23, 2017. Following consideration of scoping comments submitted by interested agencies, tribes, and the public, the City established the scope of the analysis and alternatives reflected in this Final EIS.

The City is following the procedures for phased environmental review, as authorized by the SEPA Rules (Washington Administrative Code [WAC] 197-11-060(5), Snoqualmie Municipal Code [SMC] 19.04.020), for the Snoqualmie Mill PCI Plan. Phased review allows environmental review to occur in stages, and to be coordinated with the phases of master planning for a proposal. SEPA analysis of a project, or portions of a project, that is still in the conceptual stage of planning may be evaluated broadly and more generally in an initial environmental document, followed by more detailed and focused analysis in subsequent environmental documents as more detailed plans are developed.

The planning process for the Snoqualmie Mill site is congruent with a phased approach to SEPA review. The PCI Plan establishes three planning areas on the site corresponding to future phases of development. Greater detail is provided for Planning Area 1 and lesser, more conceptual detail for Planning Areas 2 and 3. The varying detail reflects the long-term time horizon for site development, the scale and level of master planning conducted to date, the anticipated timing of development of different types of uses and buildings, and the substantial infrastructure needs that would be generated by later stages of development. Greater project detail will be provided for Planning Areas 2 and 3 over time as site planning continues. Supplemental environmental analysis and documentation will occur as master planning leads to more detailed information about later phases of development.

Some individual elements of the original 2017 PCI Plan application have changed as a result of ongoing planning, but the Proposal is fundamentally the same. For example, the mix of land uses has changed, but the same basic types of land uses are proposed; the locations of some roads have changed; and an outdoor performance venue is no longer part of the Proposal. The PCI Plan application will be amended subsequent to publication of the Final EIS to reflect the current Proposal.

1.3. PUBLIC INVOLVEMENT

As described in Section 1.2, the City held an open house in May 2017 as part of the SEPA scoping process. The City published a *Scoping Memo* in December 2017, which established the areas of investigation for the Draft EIS. Following publication of the Draft EIS on April 27, 2020, the City accepted public comment for an initial 45-day period (ending on June 11); this comment period was extended to July 10, 2020 in response to requests from Tribal government, organizations, and individuals, with the consent of the applicant. A virtual public

meeting was held on May 20, 2020 to provide opportunities for verbal comment. Refer to the Fact Sheet for additional information about the subsequent process.

1.4. PROPOSAL, ALTERNATIVES, AND OBJECTIVES

1.4.1. Objectives of the Proposal

The applicant has identified the following objectives for the Proposal. These objectives have guided planning of the site, are reflected in the application, and have been used to develop alternatives considered in the EIS.

- Develop the site consistent with the Pre-Annexation Agreement, the Post Annexation Implementation Plan, and the policies of the Snoqualmie Comprehensive Plan.
- Plan the site to accommodate approximately 1.85 million gross square feet of commercial and industrial uses to provide a substantial number of jobs, consistent with the historic use of the site as an employment center, with its Comprehensive Plan designation, and to enhance the City and regional economies.
- Provide residential uses proximate to jobs, to enable residents to work close to home and improve the balance between work and quality of life.
- Redevelop the site in phases over approximately 10–15 years with a mix of primarily commercial and industrial uses.
- Protect and enhance the site's environmental resources.
- Preserve and integrate open space into development plans for the site to provide area for flood storage, habitat, environmental mitigation, and passive recreation.
- Respect the site's history by preserving and/or integrating valuable elements of this history in development plans where feasible.
- Clean up, reuse, and revitalize a "brownfield site" to create a community asset.
- Endeavor in Planning Area 1/Phase 1 to create a node of complementary and/or related businesses that can span production, warehousing, and retailing related to a single type of industry, such as wine production or outdoor sports and recreation equipment. Integrate these uses with residential uses along a pedestrian-oriented "main street" area within a compact village center.
- Support the City's efforts to encourage tourism in the Snoqualmie Valley through the planned mix of land uses.
- Implement City policies for sustainable development through site planning that addresses natural resources, historic resources, energy efficiency, and floodplain management.

1.4.2. Proposal and Alternatives

PCI Plan Proposal

A detailed description of the Proposal and associated phased environmental review can be found in Chapter 2 – Proposal & Alternatives. The Mill site is divided into three planning areas based on existing site conditions, including the locations of environmental constraints and opportunities, and identified development potential for different land uses over time. The sequence of planned development is based on each area's proximity to existing urban development and facilities, the location of critical areas, developable area needed for different development types and forms, and identified market opportunities. Development of the site would occur in three general phases, over an approximate 10- to 15-year period. Development timing will depend on market and economic conditions and infrastructure requirements and is less certain for Planning Areas 2 and 3. The PCI Plan application contains varying degrees of detail for different areas of the site, which reflects a phased approach to planning and developing the site. Development planning for Planning Area 1 is the most advanced, and the discussion in the EIS contains commensurate detail.

Close to two-thirds of the 261-acre Snoqualmie Mill site as a whole would be retained as open space and devoted to natural areas, trails, habitat, and compensatory flood storage; approximately one-third of the site would be developed with proposed buildings, roads, and other impervious surfaces. Note that an approximately 15.7-acre portion of Planning Area 2 is currently located in unincorporated King County and would be annexed before development could occur. This area is included in the EIS for purposes of analysis but is not included in the PCI Plan application.

The proposed land use mix for the PCI Plan is shown in Exhibit 1.4-1. The Proposal's land use mix emphasizes various categories of commercial, office, warehouse, and light industrial/ manufacturing activities. Based on leasable area, corporate campus office/institutional use could be the largest potential land use on the site but would not occur until the last phase of development. Warehouse and manufacturing would dominate in Planning Areas 1 and 2. Planning Area 1 would contain a mix of land uses, while other planning areas would be focused on a discrete category of land use. At full buildout, using typical ratios of employees per square foot, the site could support approximately 3,410 jobs.

Planning Area 1 would be developed for a mix of employment, retail, and residential activities, organized in a pedestrian-oriented village center adjacent to a "main street." Approximately 160 housing units are proposed on the second and higher floors of mixed-use buildings; residential uses may require a conditional use permit or could be authorized per the code's PCI and planned unit development (PUD) review processes. Apartments would be for rent, at market rates, and would be a mix of one- and two-bedroom units, averaging approximately 835 square feet in area. Some units would be workforce housing, with residential units above and connected to commercial space.

Current planning and marketing for Planning Area 1 is focused on tenants who would produce and store wine, along with wine-related retail uses. The range of anticipated retail and

commercial uses includes restaurants, and specialty retail uses related to on-site industrial production (e.g., tasting room/wine store, or outdoor equipment sales). A conditional use permit could be required to allow wine tasting rooms. An indoor event space for weddings, parties, and corporate retreats would be integrated into the mixed-use portion of Planning Area 1. An average of one event per week is assumed, generally on weekends.

Exhibit 1.4-1. Snoqualmie Mill Development Plan – Total Site (Gross Leasable Area/Gross Acres[1])

	Planning Areas			
Land Use	**1**	**2**	**3**	**Site Totals [1]**
Warehouse/Manufacturing	280,000 sf	400,000 sf		680,000 sf
Light Industrial	120,000 sf			120,000 sf
Retail/Restaurant[2]	70,000 sf		25,000 sf	95,000 sf
Residential (Mixed-Use)[3]	134,000 sf			134,000 sf
Office/Campus	–	–	800,000 sf	800,000 sf
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
Open Space[4]	69 acres	34 acres	63 acres	166 acres
Roads/Other Impervious[5]	22 acres	13 acres	21 acres	56 acres
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, and 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 development plan total area and Planning Area 2 total area include 15.7 acres 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 Exhibit 2.3-3 for PCI Plan calculations without the unincorporated parcel.

Source: Goldsmith 2018, 2020.

EIS Alternatives

Two alternatives, in addition to the proposed PCI Plan, have been developed based on SEPA requirements and the applicant's stated project objectives: the No Action Alternative and the Redevelopment Alternative. The purpose of an alternative in an EIS is to provide a comparison to the Proposal and to explore opportunities for impact mitigation. While the alternative articulates a theoretically possible development scenario, it is not a plan that is proposed or desired by the applicant.

Redevelopment Alternative

The Redevelopment Alternative is an alternative development scenario that would include a gross leasable square footage comparable to the Proposal (1.85 million square feet), but with a different land use mix and emphasis (Exhibit 1.4-2). Open space and building/impervious site coverage would be comparable to the proposed PCI Plan, as would building layout in Planning Area 1, and the timing and phasing of development.

Land use in the Redevelopment Alternative would be predominantly warehouses; combined with manufacturing and light industrial use, these land use categories would comprise 80% of total development, compared to 45% for the PCI Plan. Compared to the proposed action, retail and office uses would be reduced, and a smaller indoor event space would be developed. Residential units would be 25% fewer than the PCI Plan. Compared to the proposed PCI Plan, total development in Planning Area 1 would be less and development in Planning Area 3 would be somewhat greater. Like the PCI Plan, Planning Area 1 would focus on wineries and compatible related uses.

The Redevelopment Alternative includes an outdoor performance space in the southeast portion of Planning Area 3. It assumes approximately 3.7 acres of landscaped open space with a constructed stage, with capacity for approximately 5,000 people. An average of two performances per week are assumed, from June through September, typically on weekend evenings.

The Redevelopment Alternative could generate approximately 54% fewer jobs than the PCI Plan – 1,570 jobs for the alternative compared to an estimated 3,410 jobs for the Proposal – which is a result of the lower employment density (i.e., average jobs per square feet of space) associated with warehouse and industrial uses compared to office uses. In terms of environmental consequences, fewer jobs would also result in reduced impacts to many elements of the environment, including traffic, water consumption, public services and facilities, and utilities. A change in types of land uses and fewer jobs could also result in reduced tax revenues to the City; the EIS analysis will enable decision makers and the public to consider these types of comparisons and trade-offs.

Exhibit 1.4-2. Redevelopment Alternative (Gross Leasable Area)

Land Use	Planning Areas 1	2	3	Total [1]
Warehouse/Mfg	291,000 sf	390,000 sf	715,000 sf	1,396,000 sf
Lt. Industrial	96,000 sf			96,000 sf
Retail/Restaurant	82,000 sf	0	0	82,000 sf
Office	0	0	156,000 sf	156,700 sf
Residential [2]	104,000 sf	0	0	104,000 sf
Outdoor Performance Space [3]	0	0	2,000 sf (stage)	2,000 sf
Event Center	15,000 sf	0	0	15,000 sf
Totals	**588,000 sf**	**390,000 sf**	**873,000 sf**	**1,851,700 sf**

[1] Numbers rounded.
[2] Assumes 120 market rate rental units in a mix of one- and two-bedroom units, averaging 835 sf.
[3] Assumes a 3.7-acre landscaped/grass open space area with a permanent stage (2,000 sf), and a capacity for approximately 5,000. An average of 2 concerts per week are assumed to occur primarily on weekend evenings from June through September. (Assumed frequency is based on the 2017 concert schedule for the Chateau Ste. Michelle winery in Woodinville, WA, which is comparable in area and capacity.)

No Action Alternative

The No Action Alternative is required by SEPA. For Snoqualmie Mill, "no action" means that the proposed PCI Plan would not go forward, and the City would not act on the Proposal. No redevelopment of the Mill site would occur, and existing on-site uses, including DirtFish Rally, would continue indefinitely. Redevelopment of the site is not assumed to occur in the near future or in the context of the current Proposal. The No Action Alternative primarily serves as baseline against which the EIS can compare the other alternatives.

Additional Alternatives Considered

The Final EIS describes three additional alternatives that were considered but were not carried forward for detailed evaluation. The alternatives included Reduced Site Coverage, Modified Land Use, and Relocation of Mill Pond Road. A detailed transportation analysis was conducted for a modified land use scenario. None of these alternatives were determined to be practical, reasonable, and/or to meaningfully reduce impacts compared to the PCI Plan.

1.5. MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

Redevelopment of the Mill site under the Proposal or the Redevelopment Alternative would convert the property from its current use to a mixed-use commercial-industrial center with multi-family residential development, creating additional housing and employment in the area. Some may view any redevelopment, and associated growth, as controversial and would prefer to see nothing happen on the site. Major issues associated with the Proposal, as identified in

the EIS and which will be resolved through the SEPA process and land use permitting, include:

- Large-scale grading necessary to make the site buildable.
- Increased impervious surface coverage.
- Potential impacts of redevelopment on flooding.
- Increased vehicular traffic to and from the site.
- Increased development intensity and building heights.
- Protection of environmental resources, including wetlands, streams, and habitat.
- Remediation of legacy pollution in conjunction with phased redevelopment.
- Demolition of some historic buildings and structures.
- Increased noise levels from construction, business operations, and special events on the site.
- Sufficient water supply to serve later phases of development and city-wide growth.

1.6. BENEFITS AND DISADVANTAGES OF POSTPONING IMPLEMENTATION

Postponing implementation of the proposed PCI Plan would also postpone achievement of several environmental and economic benefits. Postponed benefits would include:

- Cleaning up a brownfield site in conjunction with phased redevelopment and returning it to productive industrial use.
- Maintaining and enhancing natural features, such as wetlands, streams, and open space.
- Providing treatment of stormwater.
- Removing historic fill and providing compensatory flood storage.
- Generating a substantial number of industrial, commercial, and office jobs.
- Supporting local tourism and economic development.
- Generating substantial net revenue to the City of Snoqualmie.

Postponing these advantages may be viewed as a disadvantage. The advantages of postponing implementation would include the avoidance, for some period of time, of the occurrence of the significant adverse environmental impacts identified in the EIS. However, many of the identified impacts – such as to public services – are incremental and minor in degree and would be mitigated.

1.7. SUMMARY OF IMPACTS AND MITIGATION MEASURES

This section contains an abbreviated version of Chapter 3 of the Draft EIS, which contains the full text of the Affected Environment, Significant Impacts, and Mitigation Measures sections.

The text from the Draft EIS is not reproduced in the Final EIS but is referenced throughout the Responses to Comments in Chapter 3 of this Final EIS. The EIS that will accompany the application through the City's review process for the PCI Plan will include the Draft and Final EIS documents; therefore, decision makers will be able to review and consider all EIS information. Readers are encouraged to review the more comprehensive discussion of issues in Chapter 3 of the Draft EIS to formulate the most accurate impression of impacts associated with the alternatives.

Some updated information regarding Planning Area 1 is provided in Section 1.7.5, Environmental Health. Note that the Summary includes three additional recommended mitigation measures—for Cultural Resources, Transportation, and Public Services—that have been included to respond to comments received on the Draft EIS. These are identified as new mitigation measures in the text.

1.7.1. Earth Resources

How did the EIS analyze Earth Resources?

Draft EIS Section 3.1 – Earth Resources documents existing geologic conditions on the project site and in the surrounding area and evaluates potential environmental impacts of the proposed action. The discussions of affected environment and impacts are based on the following:

- Review of available geologic literature.
- Analysis of previously completed exploration pits, exploration borings, and groundwater wells.
- Visual geologic reconnaissance of the site.
- Review of Light Detection and Ranging (LiDAR) imagery of the region.
- Evaluation of nearby water well logs.

Additional subsurface exploration completed specifically for the current project included advancing one exploration boring and two cone penetrometer tests (CPTs), which observe the type, thickness, distribution, and physical properties of subsurface sediments and groundwater conditions.

What impacts does the EIS identify?

Geotechnical Impacts

Potential geotechnical impacts could result from various construction-related activities, such as site preparation, structural fill placement, and foundation construction. Examples of potential adverse impacts include sloughing of temporary or permanent cut slopes if oversteepened, failure of fill soils due to improper placement and compaction, or excessive foundation

settlement. However, geotechnical oversight is proposed as an integral element of ongoing project design and construction, and no significant adverse impacts are considered likely to occur.

Erosion Hazards, Landslide Areas, and Steep Slopes

Clearing could increase the existing landslide hazard potential by removing vegetation that would normally intercept some of the rainfall, resulting in higher runoff volumes. This could, in turn, result in increased erosion and sediment transport, further destabilizing steep slopes and potential landslide areas. Grading (earthwork) activities could also increase the existing landslide hazard potential. Fill material placed on or adjacent to a steep slope will increase the driving forces acting in the subsurface, which would increase the risk of slope failures. Surface drainage patterns are typically altered by grading. If the new drainage pattern results in an increase in either surface or subsurface water flow on or near a slope, landslides could occur. Cut slopes could also fail if they are oversteepened, toe support is removed, or drainage is improperly directed.

Seismic Hazards

- **Liquefaction:** The subject site is underlain by alluvial sediments that are potentially susceptible to liquefaction during an earthquake. Based on the liquefaction analysis described in Appendix B of the Draft EIS, the subsurface conditions encountered at the site are predicted to experience liquefaction during a design-level seismic event.
- **Lateral Spreading:** Lateral spreading is a hazard at sites where liquefiable materials are present in the vicinity of exposed slopes, especially liquefaction-prone sites adjacent to waterways. The liquefied soil layers and non-liquefiable overburden may spread horizontally toward the water due to the reduction of soil strength and lack of confinement on the water side.
- **Earthquake-Induced Landslide Hazards:** The site includes slopes near the east edge of the property, but the risk of slope failures at this location is interpreted to be low due to the very dense nature of the underlying glacially consolidated sediments. Future development along the bank of the Snoqualmie River and shoreline of the Mill Pond could be at-risk from landslide activity along the river bank or shoreline during a strong seismic event. Access to Planning Area 1 is from SE Mill Pond Road, which could be impacted by earthquake-induced landslide activity.
- **Surface Ground Rupture:** Ground rupture occurs as offsets of the ground surface and is limited to the immediate area of the fault. Based on existing geologic data, the risk of surface rupture impacting the project site is considered to be low.
- **Ground Motion:** Some existing historic structures on the project site are planned to be adapted for reuse and would require additional evaluation to determine suitable seismic retrofit requirements.

Channel Migration Impacts

A portion of the site along the southwestern edges of Planning Area 1 and within Planning Area 3 lies within the zone in which the river could change course, known as a Channel Migration Zone (CMZ), designated in City code as a Moderate CMZ on adopted City maps. No substantial development is planned in the hazard area in Planning Area 1, but the proposed relocation of a portion of Mill Pond Road, and drainage discharge improvements in Planning Area 3, would fall within the CMZ. Depending on the precise design of facilities in Planning Area 3, structures, roadways, or other facilities built within the CMZ may be susceptible to damage due to the gradual channel erosion and migration of the Snoqualmie River.

What is different among the alternatives?

Potential impacts associated with geologic, seismic, erosion, and channel migration hazards under the Redevelopment Alternative would be substantially the same as under the Proposal. Most of the same risks would generally be present with the No Action Alternative.

What are some solutions or mitigation for the impacts?

- Most development on the project site would be located to avoid construction in the Moderate CMZ area along the southwestern edge of Planning Area 1.
- Removal of a large storage pile of clean soil on the site as part of future development of Planning Area 3 would remove a potential steep slope hazard.
- Development on the project site would be subject to building codes and regulations, including the 2018 International Building Code (adopted by the City of Snoqualmie) and the City of Snoqualmie critical areas regulations.

Development under all alternatives should also adhere to best practices for the stabilization of soil, prevention of erosion, and prevention of geotechnical failure. A complete discussion of recommended mitigation measures is included in Draft EIS Section 3.1.

With mitigation, what is the ultimate outcome?

Under all alternatives, development at the project site would be subject to seismic risk, including potential structural damage and lateral spreading, and the banks of the Snoqualmie River would be subject to ongoing risk of erosion and channel migration. The risk of these potential impacts can be mitigated but not eliminated entirely.

1.7.2. Air Quality and GHG

How did the EIS analyze Air Quality?

Draft EIS Section 3.2 – Air Quality and Greenhouse Gases, addresses current and future air quality conditions and impacts, including greenhouse gas (GHG) emissions, in the context of both construction activities and ongoing operation of the proposed development. The relationship of the section's conclusions to adopted laws and regulations is also identified.

What impacts does the EIS identify?

Construction Impacts

Site preparation activities and demolition of existing buildings could result in fugitive dust and temporary increases in particulate emissions from diesel construction equipment, but these would likely be outweighed by existing transportation sources in the vicinity of the project site. Construction contractors would also be required to comply with air quality and dust control regulations; with such controls in place, these activities are not anticipated to significantly affect air quality in the project vicinity.

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 effects to air quality would be unlikely.

Traffic Air Quality Impacts

Traffic air quality modeling results indicate that carbon monoxide (CO) concentrations near the most congested intersection in the project study area would be far less than the 35 parts per million (ppm) 1-hour and 9 ppm 8-hour health-based ambient air quality standards. Future traffic volumes and delays would increase over existing conditions, but future CO concentrations are assumed to decline due to the adoption of newer, more efficient vehicles and cleaner fuel regulations. Modeled CO concentrations for the proposed PCI Plan in 2023 and 2032 are the same or a maximum of 0.1 ppm higher than the No Action Alternative, indicating that the Proposal would not cause or contribute to any significant traffic-related air quality impacts.

Facility Operational Emissions

The Proposal's land use emphasis is on various categories of commercial, warehouse, and light industrial/manufacturing activities. Other than emissions from traffic, discussed previously, 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 emergency use or routine testing of the generators.

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 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.

GHG Emissions

The Proposal would produce about 2,071,972 metric tons (tonnes) of carbon dioxide (CO2) equivalent (MTCO2e) over an 80.5- and 62.5-year lifespan for residential and all other types of structures, respectively. 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 and much smaller percentages of worldwide emissions.

What is different among the alternatives?

Construction Impacts

Early site work and construction are generally the same for the Redevelopment Alternative as discussed above for the Proposal. With implementation of controls for various aspects of construction activities and best management practices (BMPs) as discussed above, construction of these alternatives would not be expected to significantly affect air quality.

Under the No Action Alternative, the Proposal would not be built, no construction activities would occur, and no construction-related air quality impacts would be expected.

Traffic Air Quality Impacts

Similar to the Proposal, traffic air quality modeling results for the Redevelopment Alternative indicate that CO concentrations near the most congested intersection in the project study area would be far less than the 35 ppm 1-hour and 9 ppm 8-hour health-based ambient air quality standards. Future traffic volumes and delays would increase over existing conditions, but future CO concentrations are assumed to decline due to the adoption of newer, more efficient vehicles and cleaner fuel regulations. Modeled CO concentrations for the Redevelopment Alternative in 2023 and 2032 are the same or a maximum of 0.1 ppm higher than the No Action Alternative, indicating no significant traffic-related air quality impacts.

Facility Operational Emissions

Facility operational emissions under the Redevelopment Alternative would be similar to the Proposal.

GHG Emissions

This Redevelopment Alternative would produce about 1,532,814 metric tons (tonnes) of MTCO2e over an 80.5- and 62.5-year lifespan for residential and all other types of structures, respectively. Annually, this corresponds to about 24,029 tonnes, approximately 74% of the annual emissions associated with the Proposal.

What are some solutions or mitigation for the impacts?

Construction

Although significant air quality impacts are not anticipated due to construction of the project, construction contractors would be required to comply with all relevant federal, state, and local air quality regulations. In addition, implementation of BMPs would reduce emissions related to the construction phase of the project. The Washington Associated General Contractors and the Puget Sound Clean Air Agency (PSCAA) suggest several methods for controlling dust and reducing the potential exposure of people to emissions from diesel equipment. A list of some of the control measures that could be implemented to reduce potential air quality impacts from construction activities is included in Draft EIS Section 3.2.3.

Snoqualmie Mill Operations

No specific additional mitigation is necessary or proposed for project operations.

GHG and Sustainability

Sustainable features would be incorporated into the project to reduce the identified impacts to air quality and emissions. These sustainable features would be considered in the approach to the design of buildings, and in ongoing site programming and management. Sustainable features would be incorporated into the project through compliance with requirements of Building and Energy Codes and the likely use of the green building technologies, which are described in the proposed design guidelines (refer to Chapter 2).

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse air quality or GHG emissions-related impacts have been identified and none are anticipated.

1.7.3. Water Resources

How did the EIS analyze Water Resources?

Draft EIS Section 3.3 – Water Resources addresses multiple topics relating to water resources: surface water, groundwater, stormwater, water quality, and flooding. Analysis was based on hydraulic and hydrologic modeling of the Snoqualmie River and on-site wetlands. The wetland discussion in Draft EIS Section 3.3 is limited to drainage patterns and hydrology; wildlife impacts associated with wetlands are described in Draft EIS Section 3.4, Plants and Animals.

What impacts does the EIS identify?

Surface Water

Development of the PCI Plan in Planning Area 1 would increase the effective impervious area on the site (+5.13 acres) and reduce coverage of pervious surfaces (-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.

Groundwater

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.

Aquifer recharge zones that underlie the 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.

Water Quality

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.

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.

Flooding

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.

What is different among the alternatives?

The Redevelopment Alternative would have a similar impervious surface footprint, follow a similar grading plan, utilize the same on-site drainage system, and employ the same stormwater treatment protocols. Therefore, impacts to water resources would be similar to those described for the PCI Plan. With the No Action Alternative, existing drainage patterns – including the absence of water quality treatment – would continue. Grading would not occur and any benefits from grading and additional flood storage would similarly not occur.

What are some solutions or mitigation for the impacts?

Implementation of the PCI Plan would comply with all applicable stormwater regulations and design guidance published by the State of Washington, King County, and the City of Snoqualmie. Other mitigation measures include the following:

Incorporated Features of the Proposal

Features of the Proposal that would limit impacts to water resources associated with development include the following:

- Maintain relatively low density of impervious surface coverage for the site (approximately 59% open space, if landscaped open space is excluded) and create the ability to promote groundwater recharge.
- Utilize stormwater wetlands for water quality treatment and dispersion, where feasible, to promote wildlife habitat and groundwater recharge.
- Maintain hydrology to surface water dependent wetlands consistent with the 2016 King County Surface Water Design Manual (KCSWDM) Guide Sheet 3B.
- Control flooding impacts by providing compensatory flood storage in excess of existing flood storage across the site to ensure a zero-rise impact on 100-year flood elevations.
- Create a stormwater and flood flow outfall to the Snoqualmie River to promote a flow path of receding floodwaters back to the river to reduce potential property or roadway damage in future flood conditions.

Other Potential Mitigation Measures

- Maintain consistency of existing drainage patterns following development.
- Maintain flows to surface water-dependent wetlands and streams to provide recharge to the shallow aquifer.
- Promote additional recharge opportunities from constructed stormwater wetlands as part of the runoff treatment system for the site.

With mitigation, what is the ultimate outcome?

Development of the site would result in extensive grading, fill, clearing of vegetation, and construction of additional impervious surfaces, which would affect the amount and quality of

stormwater runoff and groundwater infiltration that occurs on the site. However, implementation of the proposed surface water treatment features would reduce potential impacts to less than significant levels. With application of these mitigation measures, no significant unavoidable adverse impacts to water resources are anticipated.

1.7.4. Plants and Animals

How did the EIS analyze Plants and Animals?

Draft EIS Section 3.4 – Plants and Animals addresses wetlands, streams, and fish and wildlife/wildlife habitat. It documents current conditions on the site and potential adverse and beneficial effects of the Proposal and alternatives on the functions and values of each of these critical areas.

What impacts does the EIS identify?

Potential impacts that could occur to wetlands, streams, and fish and wildlife habitat from development during construction and operation of the proposed PCI Plan include the following:

- Physical alteration of wetlands or streams**,** which can reduce habitat and water storage, alter streamflow, or change other functions and values.
- Impacts to buffers, which can reduce their functions and values for providing habitat; removing excess sediment, toxics, and nutrients; influencing microclimate; and maintaining habitat connectivity. Wetland buffers on the site are currently degraded; degraded narrow buffers, reduce buffer functions and may not protect the critical area from the indirect effects of development.
- Hydrologic impacts, which can potentially cause changes in the hydrologic conditions within the project area wetlands.
- Water quality impacts**,** including erosion/sedimentation, and runoff containing substances that can harm wetlands, streams, and the fish and wildlife that rely on them.
- Loss and degradation of plant and animal communities and fragmentation of habitat, which can directly or indirectly result from development.

As identified below, the proposed PCI Plan incorporates numerous planning and design features that would avoid, minimize, or otherwise mitigate most potential impacts. The PCI Plan would also enhance and augment the currently degraded buffers.

What is different among the alternatives?

The Redevelopment Alternative would have a similar level of development as the Proposal and a similar level of building/impervious site coverage. It would follow the same Master Drainage Plan (MDP) and buffer restoration plan as the Proposal, resulting is mostly the same level and type of impacts. However, the proposed mix of land uses would differ slightly, including the addition of an outdoor performance space in Planning Area 3. This use could introduce

additional noise and light disturbance to wildlife habitat in the area not experienced under the Proposal. With the No Action Alternative, the proposed buffer enhancement plan would not be implemented, and currently degraded buffers would remain.

What are some solutions or mitigation for the impacts?

Incorporated Features of the Proposal

- **Buffer Restoration and Enhancement Plan:** Under the Proposal, all the wetlands and streams within Planning Area 1 would be retained and provided with buffers that provide substantially greater protection than under current conditions. A mitigation and monitoring plan for impacts to critical area buffers is an element of the proposed PCI Plan. Impacted wetland and stream buffers would be enhanced pursuant to a plan and would result in an overall increase in wetland buffer area for the site as a whole.
- **Fish and Wildlife Mitigation:** The Proposal includes measures to avoid and minimize impacts to vegetation, fish, and wildlife, including wetlands and streams. Compensatory mitigation of proposed wetland buffer impacts would 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 would be revegetated with native forest plantings. In addition to the wetland and stream buffer mitigation, compensation for the anticipated loss of forest vegetation within the regulatory floodplain would be provided by planting native trees within appropriate areas of the floodway upon completion of grading. In addition, the provision of a bottomless culvert under the re-aligned portion of SE Mill Pond Road to allow for passage of floodwaters may also provide a corridor for the movement of small mammals, carnivores, and amphibians between the project site and habitats associated with the Snoqualmie River. (A bottomless culvert design is a three-sided structure that has sides and a top and uses the natural channel for the bottom.)

Avoidance of Impacts

The proposed PCI Plan would avoid direct impacts to all wetlands and jurisdictional watercourses within Planning Area 1. To avoid direct wetland impacts to Wetland 12, truck access to Planning Area 1 would occur via the haul road along the western edge of the site and avoid the haul road to the north.

Minimization of Impacts

The proposed PCI Plan incorporates several design features and measures that would minimize or limit impacts to wetlands, jurisdictional watercourses, and fish and wildlife habitat both during and after construction. These include:

- The limits of wetland and stream buffer areas would be clearly marked on construction plans and in the field.
- Construction limits, including staging areas, would be clearly marked in the field prior to beginning construction activities.

- To the extent feasible, construction staging areas would be located outside of wetland and stream buffers.
- A permanent stormwater management system would be designed and installed according to the MDP for the site.
- During construction, stormwater runoff would be treated according to a City of Snoqualmie-approved Stormwater Pollution Prevention Plan (SWPPP) for the project.
- Use of appropriate BMPs and Temporary Erosion and Sedimentation Control (TESC) measures to prevent sediment from entering wetlands and streams during and after construction 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 would be revegetated with a mixture of native plant species.
- Use of containment tarps or netting when working over water to retain fallen materials.
- Establishment of covenants, guidelines, and educational materials to prohibit the introduction of noxious weeds or invasive species into landscape areas.

Other Responsibilities and Requirements

- **Federal Emergency Management Agency (FEMA) Floodplain Habitat Assessment:** A 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 have the specific plans for stormwater and buffer enhancements that have been prepared for Phase 1.
- **Federal Consultation and Evaluations:** Where proposals require federal permits or receive federal funding, consultations may be required with the National Marine Fisheries Service (NMFS) or US Fish and Wildlife Service (USFWS) under Section 7 of the federal Endangered Species Act (ESA). Based on more detailed design and engineering, permitting for the stormwater outfall for Planning Area 1 will also involve consultation with NMFS and additional evaluation.

Other Potential Mitigation Measures

Additional compensatory mitigation measures for impacts to wildlife habitat may include the enhancement of existing wetland buffer vegetation within Planning Areas 2 and 3 by removing invasive species such as Himalayan blackberry and replanting these areas with native trees, shrubs, and groundcovers.

In addition, landscaping of developed open space areas could focus on a variety of native plant species of value to wildlife. Landscape strips within developed areas or along roadways may also include native plants that have some value for wildlife cover and food.

With mitigation, what is the ultimate outcome?

Implementation of the PCI Plan and associated mitigation would result in a net increase in wetland buffer area and enhancement of buffer functions. Some local wildlife may be displaced from the site. Given the historically intensive use and development of the site, particularly within Planning Areas 2 and 3, redevelopment of the site is not considered a significant impact to plants and animals.

1.7.5. Environmental Health

How did the EIS analyze Environmental Health?

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 chapter 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.

What impacts does the EIS identify?

Potential impacts to environmental health would be primarily associated with the accidental release of hazardous substances, fire or explosion, or disturbance of legacy contamination present on portions of the site previously used as part of the former Weyerhaeuser mill (Planning Areas 2 and 3). Additional analysis of soils and groundwater affecting Planning Area 1 was conducted for the Final EIS in 2020 and 2021. The findings of the investigation and analysis identified contaminants exceeding Model Toxics Control Act (MTCA) cleanup levels (arsenic, gasoline-range organics,and diesel-range organics, and oil-range organics). Analysis of the results, however, indicated 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. 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.

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. Although specific uses in Planning Area 1 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.

Cleanup and remediation of legacy contamination in Planning Areas 2 and 3 would occur in conjunction with development of these areas under the Proposal; development would ultimately result in a net improvement of environmental conditions. This cleanup strategy is common for "brownfield" sites like the Snoqualmie Mill. Commercial and industrial development in Planning Areas 2 and 3 would carry the same risk of direct, indirect, or cumulative accidental release or fire described for Planning Area 1.

In August 2021, the Washington Department of Ecology (Ecology) conducted a site hazard assessment of the Snoqualmie Mill cleanup site. A site hazard assessment is a standard part of Ecology's regulatory process under MTCA. The purpose of the site hazard assessment is to gather information and basic site-specific environmental data to assess and rank the site relative to other assessed sites in Washington on a scale from 1 to 5, where 1 is the highest relative concern and 5 is the lowest. Ecology assigned the Snoqualmie Mill cleanup site a ranking of 1. The ranking does not require any action or change the overall investigation and cleanup approach and reaffirms that the cleanup site will be addressed through Ecology's regulatory process irrespective of the applicant's development plans.

What is different among the alternatives?

The impacts of the Redevelopment Alternative, both adverse and positive, would be generally the same as those described for the proposed PCI Plan and Planning Area 1. The same approach to cleanup of the property would be implemented, resulting in cleanup of contaminated areas in conjunction with redevelopment of each area. Under the No Action Alternative, development would not go forward, and any remediation would occur through Ecology's regulatory process under MTCA.

What are some solutions or mitigation for the impacts?

- Legacy contamination in Planning Areas 2 and 3 would be remediated in conjunction with redevelopment, consistent with the MTCA and in coordination with Ecology.
- All wine-making processes in Planning Area 1 would occur within an enclosed building, which would likely contain any spills.
- The City's flood hazard regulations (SMC 15.12) generally prohibit the storage and use of hazardous substances within the floodplain in quantities greater than that exempted pursuant to the Uniform Building Code and/or International Building Code, and proposed grading of the project site would elevate portions of the Snoqualmie Mill property above the base flood elevation.
- All future tenants whose operations involve the use or storage of hazardous chemicals would be required 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. Clearly labeled spill response kits would be placed in the facility and used to address any spills. Hazardous chemicals would be stored in a contained area to prevent potential releases to the environment.

- 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, and during cleanup activities that precede construction, all work would be conducted in accordance 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; WAC 296-843).

With mitigation, what is the ultimate outcome?

Potential adverse impacts associated with redevelopment and operation of the Snoqualmie Mill property are primarily related to accidental releases of hazardous substances from vehicle accidents, mishaps during construction, or inadvertent spills from tenants' operations. While such impacts can be mitigated, some amount of risk of accident and inadvertent releases would remain regardless of the precautions and procedures implemented. The legacy contamination that exists in Planning Areas 2 and 3 is not considered to be an impact of the proposed action; redevelopment of the project site and concurrent remediation would have a significant positive impact on the environment.

1.7.6. Land and Shoreline Use

How did the EIS analyze Land and Shoreline Use?

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 alternatives considering the following land use topics:

- The change in intensity, character, and activity on site and along shorelines.
- The compatibility of the alternatives with current land uses on adjacent properties.

What impacts does the EIS identify?

Intensity, Character, and Activity

Most of the Mill site has no remaining developed land use, but much of the site was disturbed by previous development. The Proposal 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 are not considered to be significant or adverse impacts.

Compatibility with Adjacent Uses

No significant adverse impacts are anticipated. However, future development would be proximate to and could be partially visible from the future Snoqualmie Valley Trail to the east. From this perspective, the PCI Plan would appear as a relatively intensive development in a rural environment; this contrast in intensity of use is similar to what has existed historically, but some trail users could consider the change as a conflict. Visual impacts are summarized more fully in Section 1.7.9 of the Final EIS.

Shoreline Uses

Open space would be retained along the southern portion of the site, closest to the river. 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 Shoreline Master Program (SMP). The area adjacent to the stormwater outfall would be enhanced with landscaping, and pedestrian improvements would be constructed along the re-aligned portion of Mill Pond Road.

What is different among the alternatives?

Intensity, Character, and Activity

The Redevelopment Alternative would result in slightly more gross leasable area than the Proposal, but it would provide a different mix of land uses. While there would be slightly more building space and comparable building coverage (16%), the number of jobs (1,570) would be far lower than the Proposal. There would also be fewer mixed-use residential dwellings (120 instead of 160 units) than under the Proposal. Overall, there would be less daily employment and residential activity in a similar footprint of development.

Compatibility with Adjacent Uses

Depending on the precise design of proposed warehouse facilities in the southeast portion of the site and on the precise alignment of the planned Snoqualmie Valley Trail segment, some proximity impacts could occur. Any impacts would likely be minor and could be reduced with landscaping and screening. The planned outdoor performance space could also cause temporary, seasonal proximity impacts (e.g., noise) when in use.

Shoreline Uses

Impacts related to shoreline uses under the Redevelopment Alternative would be similar to the Proposal.

No changes to land use or shoreline use would occur with the No Action Alternative.

What are some solutions or mitigation for the impacts?

The Proposal would preserve approximately 68% of the site as open space. The PCI Plan property owner would also develop Covenants, Conditions, and Restrictions (CC&Rs) and adopt

design guidelines and a design review process that would address land use, site planning, and design, prior to submittal and City review of building permit applications.

Application of the City's Comprehensive Plan policies and designations, zoning code requirements, and SMP standards, together with the Post Annexation Implementation Plan and proposed development agreement, would provide sufficient guidance to mitigate potential land use conflicts and ensure compatibility among planned uses.

With mitigation, what is the ultimate outcome?

The changes in land use are not considered to be adverse, and no significant unavoidable adverse impacts are anticipated. The site would develop as intended in the City's plans and codes, and in the approved AIP. Planned redevelopment would create a mixed-use commercial and industrial neighborhood with a focus on jobs. Open space and public access would be provided along the shoreline.

1.7.7. Plans and Policies

How did the EIS analyze consistency with Plans and Policies?

Draft EIS Section 3.7 – Consistency with Plans and Policies evaluates the consistency of the proposed PCI Plan with selected regional and local policies and development regulations. The discussion is focused on consistency with the City's Comprehensive Plan, including Post Annexation Implementation Plan requirements, zoning regulations, shoreline requirements, and flood hazard regulations. King County land use designations applicable to unincorporated lands adjacent to the Snoqualmie Mill site are also described.

What impacts does the EIS identify?

In general, both the Proposal and Redevelopment Alternative are consistent with the City's Comprehensive Plan, zoning regulations, Shoreline Master Program, and applicable flood hazard regulations. Some of the uses or design elements proposed as part of the PCI Plan would require conditional use permits or deviations.

What is different among the alternatives?

At a policy level, the consistency of the Redevelopment Alternative is nearly the same as the Proposal. Major differences include providing relatively fewer and different types of jobs, less housing /population, reduced service demands, and less revenue, which in turn would fulfill City economic development policies to a lesser degree than the Proposal. With the No Action Alternative, policies applicable to the site, particularly those related to economic development, sustainability, and site remediation, would not occur.

What are some solutions or mitigation for the impacts?

The Proposal would comply with established plans, policies, and regulations. No significant adverse impacts were identified, and no mitigation is warranted.

With mitigation, what is the ultimate outcome?

The Proposal would comply with established plans, policies, and regulations. No significant adverse impacts were identified.

1.7.8. Population, Housing, and Employment

How did the EIS analyze Population, Housing, and Employment?

Draft EIS Section 3.8 – Population, Housing, and Employment evaluates the effects of the Proposal on residential population, housing stock and affordability, and employment in the vicinity of the Mill site and the City of Snoqualmie as a whole. Projected population and employment levels for the alternatives are compared to the City's adopted Growth Management Planning Council growth targets; Growth Management Act (GMA) population targets are considered a minimum that must be planned for and are not considered to be a cap.

What impacts does the EIS identify?

Both the Proposal and the Redevelopment Alternative would increase the resident population and the number of employees in the study area. Population and employment growth are not adverse environmental impacts in themselves. However, such growth can entail other impacts related to vehicle traffic and increased demand for public services and utilities.

The rental residential units planned as part of the PCI Plan are anticipated to rent at rates comparable to other market-rate apartments in the area, and the plan would create a substantial increase in employment, potentially increasing local demand for affordable housing incrementally.

What is different among the alternatives?

The Proposal would result in population growth of 304 persons and job growth of 3,410 employees by 2032. The Redevelopment Alternative would include less housing, resulting in a lower population of 228 persons, and substantially less employment (1,570 jobs). As a result, indirect effects associated with population and employment growth would be reduced under the Redevelopment Alternative. With the No Action Alternative, population and employment growth associated with the PCI Plan would not occur.

What are some solutions or mitigation for the impacts?

The increases in population, housing, and employment associated with the PCI Plan are not considered significant impacts, and population and employment growth are not in themselves adverse impacts. No mitigation measures are required.

With mitigation, what is the ultimate outcome?

The increases in population, housing, and employment associated with the PCI Plan are not considered significant adverse impacts. Population growth is expected to occur in the city regardless of the project and is not in itself an adverse impact. The project would provide a

limited amount of housing that would help the City accommodate expected growth; the housing would be market rate and would not be considered affordable to low-income segments of the population. The increase in employment is substantial and is considered to be a positive impact, providing individual opportunities, enhancing the City's economic base, and supporting the City's economic development goals and policies. No significant unavoidable adverse impacts would occur.

1.7.9. Aesthetics, Light, and Glare

How did the EIS analyze Aesthetics, Light, and Glare?

Draft EIS Section 3.9 – Aesthetics, Light, and Glare evaluates aesthetic and visual impacts, including changes to 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 selected for detailed analysis, and the Draft EIS simulated views of the site from the following 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 Mill site from exterior locations, this Draft EIS also addressed views of major scenic resources from the Mill site itself, specifically Mount Si and the Cascade foothills.

What impacts does the EIS identify?

Visual Character/Height, Bulk and Scale

Under the PCI Plan, the proposed development would represent substantial change to the existing visual character of the site. However, two-thirds of the overall site will remain in open space. This open space, along with the site's perimeter vegetation, would create a visual buffer around on-site development and would reduce the potential for the public or adjacent properties and developments to see into the site or to experience adverse height and bulk impacts from the Proposal. Building height would be similar to many industrial buildings associated with the site's history.

The site is clearly visible from Borst Lake and will expose more members of the public to views of the site.

The Proposal for Planning Area 1 will result in a substantial change in view character – from undeveloped to urban. 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 Planer building and Mount Si. The Proposal for Planning Area 1 includes building heights of up to 4–5 stories, but also encourages the use of materials such as glass to minimize the height, bulk, and scale impacts of development. The development regulations are intended to be flexible for projects that advance the zone's urban design goals.

Views and Scenic Resources

Under the PCI Plan, new development in Planning Areas 2 and 3 would primarily be visible from locations at elevations higher than the Mill site and far enough away to see over the surrounding screen of vegetation. One example would be the Snoqualmie Casino.

New development in Planning Area 1 has the potential to cause adverse impacts to views if it obstructs views of significant scenic resources. From Planning Area 1, the primary scenic landmark is Mount Si, southeast of the Mill site.

New development in Planning Area 1 could also potentially result in adverse impacts if it interferes with views from off site or substantially alters the visual landscape as seen from nearby important scenic or cultural landmarks (e.g., Sandy Cove Park, Snoqualmie Falls/Snoqualmie River, Borst Lake, and the Snoqualmie Casino). The analysis did not identify significant view blockage.

What is different among the alternatives?

Both the PCI Plan and Planning Area 1 will result in substantial and similar changes to visual character. On-site activities will increase public access to views from the site. With the No Action Alternative, new development would not occur, and existing visual quality would not change.

What are some solutions or mitigation for the impacts?

The Proposal includes the adoption of a master plan and implementation of design guidelines, which would establish design concepts and standards, and an architectural review process for all future on-site development.

- Draft site design concept to encourage the 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.
- Draft site design concepts for pedestrian environments require the provision of street plantings and pedestrian amenities.
- Draft design concepts 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 placement of future buildings and trees minimize disruption of these views.

Aesthetic and visual impacts could be further mitigated by application of the following or similar measures:

- Maintain open space and native vegetation areas on the site perimeter to buffer surrounding areas from development on site.
- Design standards should require the use of exterior illumination designed to reduce off-site light pollution, including the use of shielded lighting, ground-level fixtures, and other screening techniques.

- Design standards should include measures to limit nighttime light pollution or incorporate by reference such standards as promulgated by the International Dark-Sky Association (IDA).

With mitigation, what is the ultimate outcome?

Development under both the Proposal and the Redevelopment Alternative would change the visual character and lighting conditions on the property. While the change would be significant, particularly in Planning Area 1, it would occur in the context of an historical industrial site and is not considered adverse. In addition, given the topographic conditions and the location of existing vegetated areas at the perimeter, the Mill site is relatively visually isolated, and development will not be visible from most off-site locations. With the application of proposed design standards and recommended mitigation measures, no significant unavoidable adverse impacts are anticipated.

1.7.10. Historic and Cultural Resources

How did the EIS analyze Cultural Resources?

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 one mile downstream, Snoqualmie Falls. The section evaluates consistency with federal, state, and local regulations regarding the protection of historic and cultural resources and the potential of the Proposal and alternatives to adversely affect these resources.

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. Archival research included but was not limited to review of cultural resource investigations and inventory forms, histories, ethnographies, newspaper articles, correspondence with local historians and Weyerhaeuser archives, and historic maps and photographs. Field survey of the built environment included a reconnaissance-level survey, supplemented by limited excavation trenches to test for buried soils that could contain pre-contact archaeological material or other historic resources.

What impacts does the EIS identify?

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 to the resource are anticipated from development in Planning Area 1. Planning Areas 2 and 3 contain four buildings (including Crane Shed No. 3, Planing Mill-Crane Shed, and the Package Lumber Shed) 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 [SFLCo] historic district), encompassing a portion of the eastern portion of the property (Planning Area 3). 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 this is economically feasible. Other buildings and structures, many of which are decayed, would be removed. Removal of these structures could affect the integrity of the potential historic district. Development of the Proposal would not directly affect Snoqualmie Falls, a Traditional Cultural Property (TCP), but increased residents and employment (both on site and city-wide) could indirectly influence an incremental increase in tourism to the area, including Snoqualmie Falls; this, in turn, could contribute indirectly to an increase in vehicular traffic, lighting, and noise at Snoqualmie Falls.

What is different among the alternatives?

Effects to historic properties and archaeological resources would be the same under the Proposal and the Redevelopment Alternative. With the No Action Alternative, existing buildings and structures would remain and would continue to deteriorate over time. Documentation of historical buildings would not occur.

What are some solutions or mitigation for the impacts?

Development under all alternatives would be subject to federal, state, and local programs, criteria, and/or regulations for the protection of historic, cultural, and archaeological resources.

For Planning Area 1, a professional archaeologist should 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 Draft EIS.

Prior to any action that would cause an adverse effect to individual buildings considered eligible for listing—Crane Shed No. 3, Planing Mill-Crane Shed, and the Package Lumber Shed—the applicant should complete Historic American Buildings Survey (HABS) documentation Level III.

Future adverse effect to the potential SFLCo historic district from the demolition of eligible or contributing buildings or structures in Planning Area 2 or 3 will be mitigated by Level II documentation, which should consist of Appendix E of the Draft EIS (i.e., the Cultural Resources Assessment Report), and HABS Level III documentation of the Planer Mill-Crane Shed, Crane Shed No. 3, and Package Lumber Shed.

Future archaeological investigations (trench excavations and shovel probes) should be conducted when Planning Areas 2 and 3 are proposed for development. Also, during removal of the subsurface portions of the Planer building, Dry Kilns, Finished Lumber Shed, and Package Lumber Shed, a qualified architect or architectural historian should be present to evaluate the significance of any structure exposed.

Additional mitigation measures have been identified in response to comments on the Draft EIS, as follows.

- The applicant would consult with the Washington State Department of Archaeology and Historic Preservation (DAHP) to determine the need for additional survey work regarding the Japanese community site in Planning Area 1. Alternatively, based on detailed design

plans for the parking area, an engineer could determine whether soil conditions and building design would impact below ground resources.

- The applicant will continue to work with the Japanese Cultural and Community Center of Washington (JCCCW) to develop a memorandum of understanding on actions to commemorate the historical contribution of Japanese workers to the Snoqualmie Falls Lumber Company and the local community.
- The applicant would engage in additional consultation with DAHP regarding the boundaries of the potential historic district in Planning Area 3.
- The applicant would engage in additional consultation with the Snoqualmie Indian Tribe to mitigate potential impacts to the Snoqualmie Falls TCP.

With mitigation, what is the ultimate outcome?

The recommended mitigation measures, if implemented, would ensure no loss of historic information, but some loss of physical historic buildings and structures would occur as Planning Areas 2 and 3 redevelop. If eligible resources for the potential historic district are removed, federal and state laws and rules would be implemented to document the significance of the buildings and structures; thus, the loss of structures could be adverse but not significant as laws and requirements would be followed, and the historic significance of the building would be recorded.

The EIS has not identified significant direct or indirect impacts to cultural resources in relation to *SquEd* (Snoqualmie Falls TCP) from development of the Snoqualmie Mill site.

1.7.11. Transportation

How did the EIS analyze Transportation?

Draft EIS Section 3.11 – Transportation describes existing transportation conditions in the vicinity of the 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 each of the EIS alternatives based on anticipated land uses 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 Mill site.

What impacts does the EIS identify?

Development of the Proposal would result in increased truck and passenger vehicle trips, increasing vehicle traffic and congestion on nearby roads. In 2023, with development of Planning Area 1, impacts on intersection LOS would be relatively small; all but one of the 23 studied intersections (described below) are anticipated to meet City LOS standards with or without implementation of the Proposal. 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. Specific traffic volume and intersection LOS impacts are described for each alternative in the next subsection. Note that, based on available information from the Washington State Department of Transportation (WSDOT), the I-90 ramp improvement project is anticipated to be completed in 2023 and to operate at a satisfactory LOS.

Development of the Proposal would also increase demand for public transit service as a result of new employment in the study area. The anticipated wine-oriented retail uses, coupled with other recreation and tourism opportunities in the area, would also increase demand for shuttles and charter bus services.

What is different among the alternatives?

PCI Plan

Traffic Volumes

- 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.
- Full buildout of the PCI Plan (2032) would result in 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.

Intersection Level of Service

- Development of Planning Area 1 would not result in the failure of any studied intersection to meet City LOS standards. However, the EIS notes that the side-street approaches to the intersection of Fisher Avenue SE and Snoqualmie Parkway are anticipated to operate at LOS F during the AM and PM peak hours, with or without implementation of the Proposal.
- 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.

Redevelopment Alternative

Traffic Volumes

- Under the Redevelopment Alternative, development of Planning Area 1 would result in a greater amount of new vehicle trips than development of Planning Area 1 under the Proposal. The Redevelopment Alternative would produce 5,932 new weekday daily trips, including 342 new AM peak hour trips and 484 new PM peak hour trips. Planning Area 1 would also produce 6,265 Saturday daily trips.
- Full buildout of the Redevelopment Alternative would result in fewer new trips than full buildout of the Proposal. The Redevelopment Alternative would result in 8,910 new weekday daily trips, including 940 new AM peak hour trips and 1,062 new PM peak hour trips. The Redevelopment Alternative would result in 9,960 new Saturday daily trips, not including any trips associated with special events at the outdoor performance space.

Intersection Level of Service

- Similar to the Proposal, development of Planning Area 1 under the Redevelopment Alternative would not result in the failure of any studied intersection to meet City LOS standards. However, the EIS does note that the side-street approaches to the intersection of Fisher Avenue SE and Snoqualmie Parkway are anticipated to operate at LOS F during AM and PM peak hours, regardless of whether the Redevelopment Alternative is implemented.
- Under full buildout of the Redevelopment Alternative, 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 Redevelopment Alternative.
- The side-street stop-controlled approaches at the Snoqualmie Parkway / SE 99th Street intersection are expected to operate at LOS E during the PM 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.
- As with the PCI Plan, 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.
- As with the PCI Plan, 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.

Construction Impacts

Construction impacts would generally include the following: traffic associated with construction workers, deliveries, and the removal of materials, and parking associated with construction workers. In general, vehicle traffic generated by the construction activity would be less than traffic generated by buildout of the PCI Plan. Depending on construction activity, however, there is a potential that during the later years of development, the combined total construction activity for Planning Area 3 coupled with development traffic from Planning Areas 1 and 2 could be temporarily higher than with the buildout condition.

Haul route agreements and truck routes would be established in coordination with the City of Snoqualmie, WSDOT, and King County, as necessary, depending on the off-site location where haul material would be transported.

What are some solutions or mitigation for the impacts?

Improvements to the local transportation network would be necessary to mitigate impacts associated with development of the Proposal.

Incorporated Features of the Proposal

Planning Area 1

- A portion of SE Mill Pond Road would be re-aligned 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.
- It is assumed that WSDOT's planned I-90 ramp improvements will result in acceptable LOS at the interchange ramp intersections, based on the information available from WSDOT at this time.

PCI Plan Buildout

- Internal roadway connections will be added between the three planning areas to allow on-site circulation for vehicles, trucks, and non-motorized uses.
- Access would be provided 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.
- The existing private haul road north of the site would be used to provide access for heavy trucks to service industrial and warehouse uses in Planning Area 2. The haul road may warrant widening in a few locations where it is less than 25 feet wide, to ensure adequate lane width for trucks. However, the road is bounded by wetlands and a stream and their buffers; widening would likely intrude into the buffers and possibly the wetlands. Given these environmental constraints, alternatives to widening should be examined. In addition, pedestrian and other frontage improvements should not be required given that the road is private and will primarily be used by truck traffic.

Other Potential Mitigation Measures

Planning Area 1

No additional mitigation measures are required for Planning Area 1. However, the Fisher Avenue intersection would operate at LOS F with or without Planning Area 1; the applicant could contribute a fair share, with other proposed projects, toward signalization of this intersection.

PCI Plan Buildout

Full buildout of the PCI Plan would require the following improvements. The applicant should work with the City to determine its appropriate proportional fair share of the cost for each. The transportation analysis should be updated in conjunction with planning for Planning Areas 2 and 3 to reflect any changes in background growth and planned improvements, and any refinements of the PCI Plan.

- Replacement and expansion of the existing SR 202 bridge crossing the Snoqualmie River is included in the City of Snoqualmie TIP (for 2020–2025), but it is not included in WSDOT's current Capital Improvement Plan and is not funded at this time. The existing bridge has sufficient capacity to support the proposed development of Planning Area 1, but a new bridge would be necessary to support traffic associated with continued growth in background traffic and buildout of the Snoqualmie Mill PCI Plan. A new four-lane bridge would also require that the single-lane Tokul roundabout be widened to a two-lane roundabout. The applicant would work with the City, WSDOT, and tribes to help support planning, design, evaluation, and funding for a new bridge.
- Widening of the single-lane roundabout intersection at Tokul Road SE / SR 202 / SE Mill Pond Road to allow two circulating lanes. The existing roundabout is sufficient to support development of Planning Area 1, but development of Planning Area 3, anticipated in 2032, would require expansion.

- Widening of the intersection of the haul road with Mill Pond Road and construction of a new roundabout.
- Widening of SR 202 to provide one additional through lane in each direction at the Snoqualmie Parkway intersection; widening is planned as part of the City's 6-year TIP, but the project is not fully funded at this time.
- Installation of a roundabout at the SE 99th Street/Snoqualmie Parkway intersection. Improvements at this intersection are included in the City's current 6-year TIP, but the project is not fully funded at this time.
- Reconfiguration of the unsignalized intersection of Orchard Avenue SE / Snoqualmie Parkway. To improve intersection operations, side-street (northbound) left-turns should be restricted by providing an eastbound to westbound U-turn on Snoqualmie Parkway or at the Allman Avenue SE / Snoqualmie Parkway intersection to the east.
- Reconfiguration of the unsignalized intersection of Allman Avenue SE / Snoqualmie Parkway. To improve intersection operations, side-street (southbound) left-turns should be restricted by providing a westbound to eastbound U-turn on Snoqualmie Parkway or at the Orchard Avenue SE / Snoqualmie Parkway intersection to the west.
- Addition of turn lanes or a mini-roundabout at the intersection of Meadowbrook Way SE / SE Park Street.
- The City should consider adding a full signal at the Fisher Avenue SE / Snoqualmie Parkway intersection for vehicle turn movements, with or without the PCI Plan. A full signal would improve operations to LOS B. If the City concurs that this improvement is appropriate, project mitigation could include contributing a proportional share toward the full signal.
- Contribute a proportional share to the cost of the City's planned roundabout at the Meadowbrook Way SE / SE North Bend Way intersection.
- To minimize construction traffic impacts, the applicant should prepare a Construction Management Plan prior to beginning construction. Haul route agreements and truck routes would be established in coordination with the City of Snoqualmie, WSDOT, and King County. A traffic monitoring plan can also be developed to manage traffic levels at the site access locations and determine if traffic levels with construction are higher than evaluated for the project buildout. If so, additional mitigation measures could be implemented to reduce construction or general traffic levels.
- The following new mitigation measure is added to the EIS:
    - The project-specific Design Guidelines should require that building owners provide facilities (e.g., bike storage, showers) that encourage bicycle use. Similarly, employers that are not subject to the Commute Trip Reduction Act should implement programs that encourage transit use.

Redevelopment Alternative Improvements

Mitigation measures for the Redevelopment Alternative would be the same as for the proposed action, with one addition: development of an Event Management Plan, including Transportation Management Plan (TMP) strategies to accommodate traffic generated by large events at the outdoor performance space.

With mitigation, what is the ultimate outcome?

Traffic and congestion on area roadways will unavoidably increase as a result of the proposed PCI Plan and background growth. With implementation of the currently programmed road improvements and additional improvements recommended for the Proposal, however, all study intersections would operate at satisfactory levels of service, consistent with adopted City standards.

1.7.12. Noise

How did the EIS analyze Noise?

Draft EIS Section 3.12 – Noise evaluates the potential of the Proposal and EIS alternatives to generate additional sound perceptible to people in and around the proposed development area. The 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 (warehouses, light industrial and mixed-use buildings, plus on-site traffic) was also considered.

What impacts does the EIS identify?

Construction Impacts

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.

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.

Further, due to the temporary nature of the project-related construction activities, the potential for perceived noise impacts from construction would be limited in duration.

Operational Impacts

After construction, noise-generating features of the Proposal, including stationary equipment (rooftop ventilation units, HVAC systems, etc.) and on-site truck and passenger vehicle traffic, could create ongoing noise. Noise related to wine-making and other light industrial activities would occur within enclosed buildings and would not affect nearby residential uses.

Noise emissions from operation of the Proposal, both after construction of Planning Area 1 and 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 increase in noise less than 3 dBA in active outdoor environments, especially when these increases occur over a number of years. Therefore, the project-related noise increase is unlikely to be perceptible at this location and would not be considered an impact. Increases in noise at all other noise model receiver locations would be even less than 2 dBA. Therefore, impacts due to project-related increases in the ambient noise environment are not anticipated at any receiving location.

Off-Site and Cumulative Traffic Noise Impacts

The proposed PCI Plan would generate traffic through operation of new residential, office, retail, entertainment, and recreational facilities. While traffic noise from public roadways is exempt from applicable sound level limits, project-related traffic may cause perceptible increases over existing noise levels or result in noise that interferes with speech or enjoyment of outdoor activities.

Measurements and traffic projections indicate that existing AM-peak period sound levels near most project-affected roadways are between 63 and 68 dBA. With the Proposal, traffic noise would increase over No Action levels in both 2023 and 2032 by 1–2 dBA at nearby sensitive receptors. 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, and a 10-dBA change would be perceived as a doubling of the loudness. Therefore, it is likely that most people would not perceive the differences in traffic noise between existing conditions, No Action, and the proposed PCI Plan.

What is different among the alternatives?

Construction Impacts

Noise from construction of the Redevelopment Alternative, including the potential for perceived impacts during permitting daytime construction activities, would be similar to the Proposal.

Operational Impacts

The Redevelopment Alternative would include less retail and office space and fewer residential units and would include a smaller indoor event space compared to the proposed PCI Plan.

Therefore, operational noise from building equipment and traffic (i.e., excluding the amphitheater) are anticipated to be slightly lower than the Proposal, resulting in compliance with the King County Code sound level limits, and small to no increase over existing ambient conditions.

Unlike the Proposal, the Redevelopment Alternative would include an outdoor performance space. While the type and nature of the performances is currently unknown, the analysis assumed the operation of an outdoor music concert to provide a conservative estimate of impacts. Operation of the amphitheater is expected to be within the applicable City of Snoqualmie/King County sound level limits at all nearby receivers, although it would approach the established limits at residential receivers south of the site. Compliance with City of Snoqualmie/King County limits would be required at all times, unless flexibility is granted by the City.

Off-Site and Cumulative Traffic Noise Impacts

Based on the traffic analysis, AM-peak period traffic volumes associated with the Redevelopment Alternative would be similar or less than the volumes associated with the proposed PCI Plan. Therefore, off-site traffic noise associated with the Redevelopment Alternative would be similar to or less than the Proposal.

What are some solutions or mitigation for the impacts?

Noise may be audible at residential locations during some elements of construction and operation of the Proposal and alternatives. However, neither construction nor operation of the facility is expected to result in significant noise impacts, and no mitigation measures are warranted.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse noise impacts are anticipated related to construction or operation of the proposed PCI Plan or the alternatives. Noise from operation of the amphitheater, which is only included in the Redevelopment Alternative, may be perceived at some residential locations depending on when the facility operates, but is nevertheless expected to comply with applicable sound level limits.

1.7.13. Parks

How did the EIS analyze Parks?

Draft EIS Section 3.13 – Parks describes existing and planned parks, trails, and recreational facilities within and provided by the City, and existing and planned regional trails in unincorporated King County. The analysis is based on adopted level of service standards and needs identified in the City's 2018 Open Space, Parks, and Recreation Plan.

What impacts does the EIS identify?

Under all the alternatives, including the No Action Alternative, increased population growth in Snoqualmie would drive increased demand for parks and recreational facilities and programs. As documented in the 2018 Open Space, Parks, and Recreation Plan, the City currently has existing deficiencies in most recreation facility categories. Existing demand and demand under future baseline growth would need to be addressed through the City's capital facility planning process and updates to the Open Space, Parks, and Recreation Plan.

Under all alternatives, including the No Action Alternative, a range of park and recreation facilities would fail to meet applicable LOS standards.

Population growth under either the PCI Plan or Redevelopment Alternative would result in minor and insignificant impacts and effects on projected LOS that are only incrementally greater than those under future background growth without the PCI Plan.

What is different among the alternatives?

With the No Action Alternative, the incremental increases in demand for parks and recreation would not occur, nor would the proposed trail system. However, deficiencies in LOS would result from projected background growth.

The Proposal would result in a greater increase in population (304 residents) than the Redevelopment Alternative (228 residents). For most recreation facility categories, the increased demand is effectively the same under the two alternatives. For the following park categories, the Proposal would increase park acreage needs over the Redevelopment Alternative by minor amounts:

- Neighborhood Parks: 0.15 acre
- Community Parks: 0.61 acre
- Water Access Areas: 0.08 acre

What are some solutions or mitigation for the impacts?

The PCI Plan would provide land for connections to local and regional trails, specifically the Riverwalk Route and the missing Snoqualmie Valley Trail link. The Proposal would also include an integrated trail system on site with passive and active recreation opportunities, including a paved pathway along the re-aligned portion of Mill Pond Road. Under the PCI Plan, approximately 63% of the overall site would remain as 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.

The Redevelopment Alternative would include an additional 3.7-acre landscaped/grass open space area associated with the proposed stage/performance area.

With mitigation, what is the ultimate outcome?

There are no significant unavoidable adverse impacts related to parks, recreation, and open space caused by the proposed PCI Plan. Although demand for these services would increase incrementally as a result of the proposed PCI Plan, the increase is not considered significant.

1.7.14. Public Services

How did the EIS analyze Public Services?

Draft EIS Section 3.14 – Public Services evaluates potential impacts of the Proposal 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. The study area for public services consists of the Snoqualmie Mill site and City limits; the Police Department and School District also serve areas outside the City limits. The analysis is primarily based on interviews with Snoqualmie City police and fire officials responsible for providing public services, and a review of relevant City and School District plans and studies.

What impacts does the EIS identify?

Police

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. At present, the Snoqualmie Police Department is understaffed for large special events, and this need could be exacerbated by periodic public events at the site.

Fire

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.

Schools

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 Mill site would generate approximately 28 additional students. For comparison, baseline growth for the City of Snoqualmie through 2032 would generate approximately 730 students.

What is different among the alternatives?

Compared to the Proposal, the Redevelopment Alternative would have reduced levels of housing and employment. As a result, demand for public services would similar to or lower than the Proposal. With the No Action Alternative, the site would not provide any additional housing or employment, and the incremental increases in demand for public services from the Proposal would not occur.

What are some solutions or mitigation for the impacts?

According to the EIS Fiscal Analysis, summarized in Section 1.7.16 of the Final EIS, development of the PCI Plan would increase tax revenue, which would offset increases in demand for municipal services. City regulations require development to comply with international building and fire codes and impose school impact fees to offset the costs to the School District associated with additional students. The following new mitigation measure for fire service is added to the Final EIS: When building heights are finalized, the applicant should consult with the Snoqualmie Fire Department to determine whether a shared ladder truck is needed.

With mitigation, what is the ultimate outcome?

The Proposal would create an incremental increase in demand for public services. Increased tax revenue that will be generated from the development that would enable the City to maintain appropriate levels of service for police and fire services. Future residential development would be subject to school impact fees to ensure adequate capacity for students at schools. No significant unavoidable adverse impacts are anticipated.

1.7.15. Utilities

How did the EIS analyze Utilities?

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. 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.

What impacts does the EIS identify?

Water

Total demand of the Proposal, based on the uses proposed for the Snoqualmie Mill site, would be approximately 799 Equivalent Residential Units (ERU). Development of Planning Area 1 would account for 239 ERU of this projected demand, from residential units, light industrial/

wine production, and retail operations. 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.

Sewer

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.

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, pretreatment may be required before discharge is allowed to the public sewer.

The City's wastewater treatment facility may not have sufficient 5-day Biological Oxygen Demand (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; this conclusion is preliminary and is based on the General Sewer Plan (GSP) update currently underway. Additional improvements to increase the wastewater treatment facility's rated BOD_5 loading capacity may be necessary to support full development of Snoqualmie Mill Planning Area 1 wine production. Options identified to date include BOD handling improvements to the wastewater treatment facility, or possible construction of a pre-treatment facility, which is currently proposed as part of the Snoqualmie Mill sewer system design. 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.

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.

Stormwater

In general, the quality of stormwater discharged to the Snoqualmie River is expected to improve relative to current conditions. Wetland buffer restoration and enhancement proposed as part of the PCI Plan, further 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 to Snoqualmie River water quality are not expected to be significant.

What is different among the alternatives?

Compared to the Proposal, the Redevelopment Alternative would include a greater share of warehouse uses and reduced retail, office, and residential uses, and would include an outdoor performance space, which is not part of the Proposal. The overall development footprint would remain approximately the same. Increasing the amount of warehouse uses on the site and reducing retail and office uses would lower the amount of employment overall and eliminate office use; these changes would reduce water consumption and wastewater discharge compared to the proposed PCI Plan. Winery water and wastewater demand would be the same, however.

Similar to the Proposal, preliminary information from the ongoing water and wastewater system plan updates indicates there may not be sufficient water supply or wastewater BOD_5 treatment capacity to serve the Redevelopment Alternative.

Because the overall development footprint would be approximately the same, the Redevelopment Alternative would have the same stormwater drainage impacts as the Proposal.

What are some solutions or mitigation for the impacts?

Incorporated Features of the Proposal

- Site grading and sanitary sewer systems would be designed so that the rims (or tops) of manholes would lie above the 100-year base flood elevation of the Snoqualmie River.
- 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).
- New buried utilities, particularly those that are sensitive to grade changes (such as gravity sewers), should be supported by a layer of new structural fill, similar to that which will be used below paving.
- Use of earthquake-resistant ductile iron pipe will be considered to reduce the risk of failure of the water distribution system 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.

- Critical infrastructure needed for ingress and egress to the site, and to ensure long-term stability, would be re-aligned along Mill Pond Road.
- Work within existing functional wetland or stream buffer boundaries would be limited to the dry season (avoiding November through February) where feasible.

Other Responsibilities and Requirements

- Water, wastewater, and stormwater improvement requirements and fair share mitigation responsibilities for the Snoqualmie Mill site will be determined more specifically as updates to the City's water and wastewater plan progress and review of the project continues.
- The Snoqualmie Mill site will be included as part of the City's retail water service area for the Wastewater System Plan (WSP) 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, but the development may also require a Project Report.
- The Snoqualmie Mill site will be included as part of the City's sewer service area for the GSP update currently being prepared. 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 outlining any proposed winery production at the Snoqualmie Mill site.
- A National Pollutant Discharge Elimination System (NPDES) Permit for Stormwater Discharges associated with construction activities would be obtained from Ecology.
- Water main facilities would be designed to minimize potential leaking or inflow from groundwater inundation. Materials and pipe connection systems would be reviewed by the City at the time detailed development plans are submitted.
- Sanitary sewer systems would be designed to minimize potential infiltration and inflow from groundwater. Materials and pipe connection methods would be reviewed by the City at the time detailed development plans are submitted.
- A Stormwater Pollution Prevention Plan (SWPPP) would be prepared as required by the NPDES permit and would be used and updated on site as warranted, including monitoring requirements determined by Ecology for the permit.
- Major Temporary Erosion and Sedimentation Control (TESC) measures (per the King County Construction Stormwater Pollution Prevention [CSWPP Plan], 2016) likely to occur in the NPDES permit would include, but are not limited to, the following:
    - Marking the clearing limits (i.e., marking limits, critical areas, and buffers on plans and in the field using plastic, metal, or stake wire fence).

- Installation of temporary construction access (stabilized entrances) and staging areas (i.e., limiting construction vehicles to points stabilized with quarry spall or rock with wheel wash).
- Road cleaning (i.e., street sweeping).
- Perimeter protection such as silt fencing when necessary (i.e., all perimeter areas not upslope of construction clearing) to intercept fine sediments and fencing or flagging of clearing limits.
- Soil stabilization: temporary or permanent cover over disturbed areas or stockpiles, such as seeding, mulching, sodding, plastic covering, or erosion control fabrics and matting to the soil or gravel base, to prevent erosion.
- Use of an on-site TESC inspector.
- Treatment of runoff to remove sediment (e.g., sediment traps or ponds).
- Stabilization of channels and outlets (i.e., armoring as necessary to prevent erosion or scour).
- Control of all pollutants on site, including removal and legal disposal of construction waste or soils contaminated by construction activity or accidental spills.
- Accidental spill response plans, on-site cleanup materials storage, and worker training.
- Use of BMPs to prevent adverse pH effects from concrete work on the site or cause violation of water quality standards for pH in the receiving water.
- Control of dewatering (flow rate and sediment control) into a controlled conveyance system to receiving waters (if clean and non-turbid), or retention for other purposes (e.g., dust control).
- Dust control: preventative measures to minimize wind transport of soil.
- Maintenance and inspection of BMPs and TESC measures.

Other Potential Mitigation Measures

- Include provisions in the project development standards/design guidelines to require the usage of water-conservation features to reduce water demand and ensure that development does not exceed system capacity. Examples include water-efficient fixtures, greywater reuse systems, rainwater harvesting, or drought-resistant landscaping.
- Implement the BMPs identified in Ecology's Winery General Permit, which include the removal of solids, control of organic loads, maintenance of the waste management system, and improving water efficiency. Additional BMPs to address the use and storage of chemicals are addressed in Draft EIS Section 3.5 – Environmental Health.
- To ensure coordinated planning and operation of stormwater facilities, an Operation and Maintenance Manual should be provided to the City at the completion of each phase of development and at the completion of the overall site that summarizes the stormwater system operation and maintenance requirements.

With mitigation, what is the ultimate outcome?

Development of the site would increase the demand for water, sewer, and drainage utility services. Although this increase is a significant and unavoidable result of the Proposal, the increase in itself is not necessarily adverse, provided that water supply is sufficient to support it, that required facilities to convey and treat water and wastewater are adequate, and that drainage facilities protect water quality.

The GSP update, currently underway, is evaluating alternatives for increasing the wastewater treatment facility's rated BOD_5 loading capacity. Stormwater discharge would increase, but design features incorporated into the Proposal (e.g., water quality treatment) and proposed measures would mitigate significant impacts to water quality.

1.7.16. Fiscal and Economic Impacts

How did the EIS analyze Fiscal and Economic Impacts?

Draft EIS Section 3.16 – Fiscal and Economic Impacts analyzes potential impacts of the Proposal on the local economy. The Fiscal Analysis estimates potential future costs and revenues associated with developing the PCI Plan between now and 2037 by comparing the additional revenue generated by development to the additional service and infrastructure costs needed to serve that development.

What impacts does the EIS identify?

Development of the Snoqualmie Mill site as envisioned in the proposed PCI Plan or Redevelopment Alternative would generate positive fiscal and economic impacts for the City of Snoqualmie compared to the No Action Alternative where the site stays in its current condition.

- **Fiscal Impacts:** Over the 20-year study period considered in the Fiscal Analysis, development could generate an estimated $34.6 million in new general fund revenue for the PCI Plan and $31.4 million for the Redevelopment Alternative, compared to just $2.9 million in additional service costs. Infrastructure improvements attributable to the Proposal will be mitigated or paid for by the applicant. The Proposal would produce a small amount of new ongoing maintenance costs to the City. Development would also generate $640,000 under the PCI Plan and almost $500,000 in the Redevelopment Alternative for capital purposes, most of which can be spent on capital needs elsewhere in the City.
- **Community and Economic Impacts:** The development would accommodate between 1,570 and 3,410 new jobs, for the Redevelopment Alternative and proposed PCI Plan, respectively. It would also create a destination that attracts both new visitors and visitors already in the area; additional spending on goods and services would also occur. This additional economic activity would benefit businesses throughout the City, generate additional revenues, and further the City's economic development objectives.

What is different among the alternatives?

- The Redevelopment Alternative would generate 1,840 fewer jobs than the Proposal and would generate roughly $3.2 million less in general fund revenue for the City.
- City revenue for capital purposes would be approximately $140,000 lower under the Redevelopment Alternative than under the Proposal.

- Infrastructure improvement costs associated with development of the site would be similar under the Proposal and Redevelopment Alternative.

What are some solutions or mitigation for the impacts?

The proposed PCI Plan would generate positive fiscal and economic impacts for the City and would more than offset any financial burdens on City services from development; no mitigation is required.

With mitigation, what is the ultimate outcome?

Development of the PCI Plan would result in net increases in general fund and capital revenues for the City. No significant unavoidable adverse impacts would occur.

2.0 Proposal and Alternatives

INTRODUCTION TO FINAL EIS

Summary of Changes to the EIS Document

This Final EIS is the second document in the sequence of documents that comprises a complete environmental impact statement. The primary function of a Final EIS is to respond to comments received on the Draft EIS from government agencies, tribes, organizations, and individuals. It also documents any changes in the Proposal or alternatives; supplements the environmental analysis where appropriate; and corrects errors in the Draft EIS.

Several chapters of the Final EIS contain minor, primarily editorial, grammatical, or typographical changes from the same chapters in the Draft EIS, which are summarized here. The changes are generally intended to improve consistency of terminology and readability of the document, or to correct minor errors. These are summarized further below.

Chapters 1 and 2 of the Final EIS contain numerous non-substantive typographical, grammatical, and editorial changes to the description of the Proposal and alternatives. These include minor changes to terminology, correction of fractional numbers, and addition of references to the "Final EIS" or "EIS" as well as to the "Draft EIS." Some text has been added in a few places to reference issues (such as the removal of floodplain fill) that are addressed substantively in Chapter 3, Responses to Comments Received on the Draft EIS. Incorrect references to compass directions (e.g. north rather than south) were corrected. Because these are minor and not substantive, they are not otherwise marked in the text of the document.

There is limited new information in these chapters as well. Chapter 1, Summary, also contains a few new recommended mitigation measures related to cultural resources, fire service, and transportation (bicycle and transit). Chapter 2 contains a new subsection (Section 2.4) that describes three additional alternatives that were considered but not carried forward for detailed analysis. Datasheets from the transportation analysis that was performed as part of this evaluation are contained in Appendix C of the Final EIS. Supplemental analysis of soil and groundwater conditions in Planning Area 1 is included in Appendix B of the Final EIS and summarized in Chapters 1 and 3.

Chapter 3, Responses to Comments Received on the Draft EIS, and Appendix A, Comment Letters, are new and specific to the function and contents of a Final EIS.

A few additions are included in Chapter 4, References, and Chapter 5, Abbreviations, to incorporate information contained in responses to some comments.

Note on Terminology

An EIS may sometimes refer to a specific development proposal, such as the PCI Plan, as the "Proposal" or the "proposed action," or as an "alternative" or the "preferred alternative." In the context of SEPA definitions and requirements, there is no functional or substantive difference among these various terms. They all refer to a course of action that is being considered or that has been formally proposed by an applicant. If the PCI Plan were referred to as an "alternative," this EIS would include three alternatives, rather than a proposed plan plus two alternatives. But irrespective of terminology, the scope and approach to the analysis would be the same. And regardless of what it is called, any proposal or alternative is subject to modification based on the analysis of impacts and mitigation measures in the EIS. Because the Snoqualmie Mill development plan is the subject of a formal application that has been submitted/proposed to the City, this EIS (including the technical appendices) uses the terms Proposal, proposed action, PCI Plan, proposed PCI Plan, Snoqualmie Mill Proposal, or proposed project interchangeably throughout.

2.1. OVERVIEW OF PROPOSAL

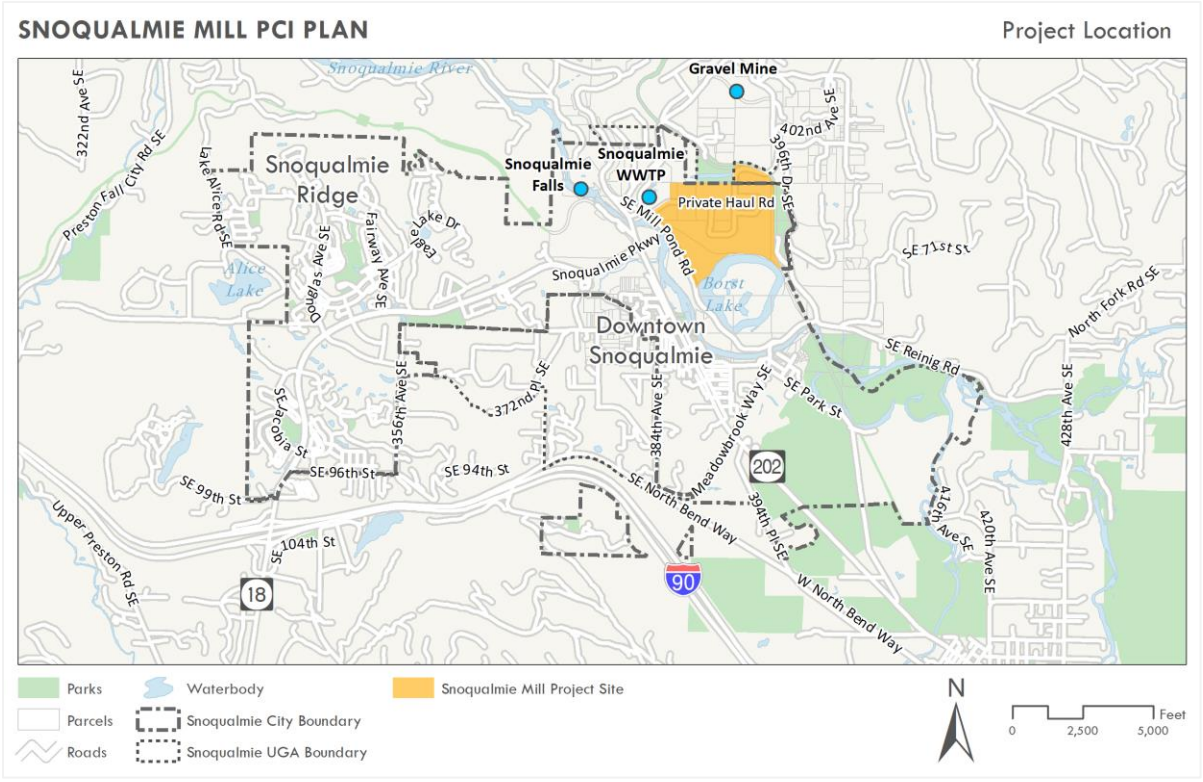
2.1.1. Proposal/Proponent

The proposed action is approval of a Planned Commercial/Industrial (PCI) Plan and a development agreement for the Snoqualmie Mill site. The Proposal is sponsored by Snoqualmie Mill Ventures, LLC, located at 240 Main Avenue S., Suite 107, North Bend, WA 98045, referred to in the EIS as the applicant.

2.1.2. Location

The project site is located in the City of Snoqualmie, WA. 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. The site is located within Sections 29 and 30 of Township 24, Range 8 East, W.M. Refer to Exhibit 2.1-1. Other nearby features and uses include the Snoqualmie River on the west, the City's wastewater treatment plant to the northwest, and an existing gravel mining operation to the north. The Mill Pond/Borst Lake is not owned by the applicant and is not part of the proposed action.

Exhibit 2.1-1. Project Location



Source: King County Assessor, BERK 2021

The 261-acre Snoqualmie Mill property was annexed to the City in 2012; however, a 15.7-acre area in the northeastern portion of the site (Planning Area 2) remains within unincorporated King County and is not included in the PCI Plan application submitted to the City. Annexation of this area, which is within the City's designated Urban Growth Area (UGA), would occur before any specific development is proposed on this portion of the Mill site; most of the unincorporated area – 8 acres – would be maintained as undeveloped open space, and 7.7 acres would be developed. This area is included in the overall PCI Plan, however, and is evaluated in the EIS to provide a complete, long-term picture of the Proposal. The development capacity of the unincorporated parcel is discussed further below.

2.1.3. Proposed Action

The applicant is seeking approval of a PCI Plan and a development agreement for the Snoqualmie Mill site. The proposed development agreement will help guide subsequent planning and development of the overall site. The proposed action also includes approval of conditional uses (for residential and some commercial uses) and two zoning code deviations (for building height and for some individual wetland buffers). Deviations could also be proposed, if necessary, to allow wetland buffer enhancement, stormwater conveyance and water quality facilities, and a road and trail in the Open Space 2 zone.

PCI Plan

The EIS addresses development of the Snoqualmie Mill site in several phases over an approximate 10- to 15-year period; timing could vary depending on economic and market conditions. Buildout would include a total of approximately 1.83 million gross square feet of light industrial/manufacturing, warehouse, office, retail, and residential uses. When fully developed, the site could generate an estimated 3,410 jobs. A majority 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.

The site has been divided into three distinct 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. More conceptual information is provided for Planning Areas 2 and 3, which would be developed subsequently and have not been planned in detail. A lot line adjustment application will also be submitted to modify the boundaries, but not the number, of existing lots. Applications for building permits and other required development approvals will be submitted during or following the approval process for the PCI Plan. The EIS Fact Sheet identifies known and potential land use approvals and subsequent development permits and approvals.

Development Agreement

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 SEPA analyses 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. A proposed development agreement will be submitted in conjunction with a revised PCI Plan application.

2.2. BACKGROUND INFORMATION

Site History

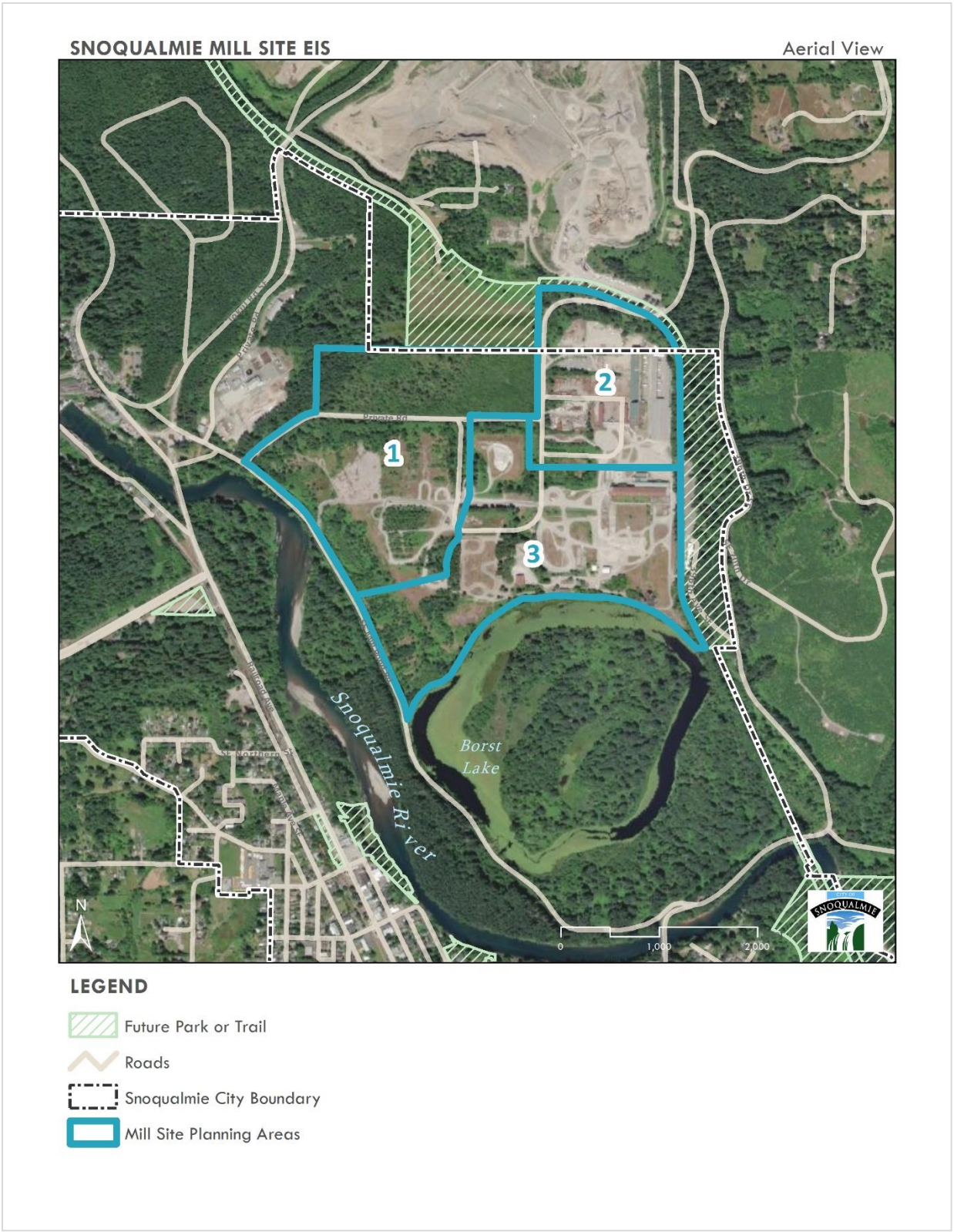
The Snoqualmie Valley has a rich and interesting history, which encompasses elements of its geology, habitation by Native Americans, and more recent use and development for its valuable natural resources. The historic industrial use of the Snoqualmie Mill site is summarized below, based on information from a variety of sources (David Wilma, The History and Future of the Snoqualmie Mill Site, 2015; King County Landmark Registration Form, 2005; Cascadia

Archaeology, 2017; and the Mill Planning Area Post Annexation Implementation Plan (AIP), 2016). Detailed information about the geology, archaeology, and industrial history of the site is contained in Draft EIS Sections 3.1 (Earth Resources), 3.6 (Land and Shoreline Use), and 3.10 (Historic and Cultural Resources), respectively.

Weyerhaeuser Mill Construction & Operation

The Snoqualmie Mill site was an important source of employment in the Snoqualmie Valley for almost 100 years. The Weyerhaeuser Timber Company purchased the property in 1914 and began clearing and grading to construct a lumber mill. The eastern "hillside" portion of the original Weyerhaeuser property, which is not part of the Snoqualmie Mill site, was developed as a company town. Named Snoqualmie Falls, it included 250 employee housing units, a community center and company store, a boarding house and hotel, a 50-bed hospital, and a school. At its peak, the community had a population of almost 2,000 people. Construction of mill facilities and infrastructure began in 1916. The Mill Pond (Borst Lake), which is not part of the Snoqualmie Mill Proposal, was excavated and used to sort logs. Most of the site was cleared, graded, and filled to accommodate log storage—primarily on the western portion of the site and adjacent to the Mill Pond—and mill operations were located on the eastern portion. A Chicago, Milwaukee & St. Paul railroad line was constructed on a berm along the eastern portion of the site to transport lumber from the mill, and a railroad depot was constructed in the town. Numerous on-site roads and approximately 12,000 linear feet of drainage ditches were also constructed to support mill operations. A private haul road traverses the northern portion of the site and connects 396th Drive SE to Mill Pond Road; Weyerhaeuser maintains the haul road, which serves the gravel quarry to the north. The lumber mill, which began operating in 1917, was the second all-electric mill in the country. An aerial photo of the site, showing the locations of former and existing structures and activities, is contained in Exhibit 2.2-1. At its peak, after World War II, the mill employed an estimated 1,500 workers.

Exhibit 2.2-1. Site Aerial



Source: King County Assessor, BERK 2019

Existing Site Conditions

The Snoqualmie Mill site is flat, which reflects the extensive grading and fill that was placed on the site in conjunction with construction and operation of the Weyerhaeuser sawmill. As discussed in detail in Section 3.1 of the Draft EIS, depths of fill across the site vary from approximately five feet to more than 20 feet. The deepest fill soils are generally located in Planning Area 1 and the northern central portion of the site (Planning Area 2); both areas were used historically for log storage. The remnants of several earth berms are located along the north and west perimeters of the site; the berms, which are discussed further below, contribute to flooding and will be graded.

The entire site, except the elevated berms, is within the floodplain of the Snoqualmie River. The site also contains areas of wetlands, streams, a system of manmade drainage ditches, geologic hazards, and other critical areas that are regulated by the City; the US Army Corps of Engineers also has jurisdiction of some of the site's wetlands. The site is primarily bare of undisturbed natural vegetation except along perimeter areas; existing vegetation, including the buffer areas of regulated wetlands and streams, is generally degraded and of poor quality. The locations, characteristics, and effects of planned development on these features are discussed in Sections 3.1, 3.3, and 3.4 of the Draft EIS.

Between 1980 and 2006, numerous assessments of known and potential site contamination from past industrial activities, and numerous remedial actions, occurred on the Mill site. A summary prepared by the City in 2011, and a 2015 study prepared for and included in the Post Annexation Implementation Plan (AIP), summarized existing information about potential areas of concern and cleanup actions (AESI, 2015); the summary characterized the site as a "brownfield," which is generally a site that requires some level of cleanup but can be redeveloped and reused.[1] Six areas of potential environmental concern, located in Planning Areas 2 and 3, were identified in initial studies at the time of the AIP. The EIS consultants have reviewed this initial information and numerous studies prepared by Weyerhaeuser and have also conducted supplemental studies. A summary of additional testing and analysis of soils and groundwater in Planning Area 1 is contained in Final EIS Chapter 3, Responses to Comments Received on the Draft EIS. Supplemental analysis of soil and groundwater conditions in Planning Area 1 is included in Appendix B of the Final EIS.

Draft EIS Section 3.5 – Environmental Health contains detailed information on potential contamination and recommended remedial actions. The property is not a designated "Superfund" site per federal statutes; it will be cleaned up consistent with the standards and procedures of the Washington Model Toxics Control Act (MTCA, WAC 173-340) under the direction of the Department of Ecology.

[1] See: https://www.epa.gov/brownfields/overview-epas-brownfields-program

Current Site Uses & Facilities

In 2003 the mill was closed and demolition of existing buildings and site cleanup activities began. Several original industrial buildings remain, with some currently used for storage. The old brick Powerhouse, which housed a steam-powered generator, and an associated 211-foot tall brick stack survive and are designated as a King County Landmark. Remnants and foundations from numerous buildings are still present, generally on the eastern portion of the site. The hillside (42 acres) contiguous to the site on the east was acquired by King County Parks in 2015 and is planned to become part of the Snoqualmie Valley Trail. This area is not part of the Snoqualmie Mill site and is not included in the PCI Plan application.

There are several current uses of the site that will continue in the near term but will be displaced by planned development over time. Ultimate Rally LLC (aka DirtFish Rally School) has been leasing land for operating a driving instruction school on a portion of the site since 2006. DirtFish uses the network of paved and unpaved roads located primarily in the central portion of the site. Associated facilities provide space for storage of equipment and parts, maintenance of vehicles, and an office/classroom building located on the eastern hillside. The site's existing road system will be modified or displaced in increments over time, and DirtFish activities will be curtailed, as phased development occurs. Ongoing DirtFish operations have been factored into the EIS analysis where relevant.

Other current activities include storage of wood recycling materials, production and storage of topsoil for local construction projects, a beehive operation, temporary construction staging, and truck storage.

Several of the former mill's buildings remaining on the site, or portions of buildings, are habitable and are rented to commercial tenants. Many others, however, are deteriorated, vacant, not structurally sound, and/or not safe for occupancy. Portions of some roofs or siding have blown off in recent storms; a portion of one building has been fenced off to prevent access. The applicant intends to rehabilitate and reuse two key historic buildings on site – the Powerhouse plant and the Planer building – if upgrading is financially feasible. The condition of individual buildings is discussed in greater detail in Draft EIS Section 3.10 – Historic and Cultural Resources and Appendix E of the Draft EIS, and in Chapter 3 of the Final EIS.

Borst Lake (aka the Mill Pond) is a separate property located south of the Mill site. The pond was excavated and used by Weyerhaeuser for log sorting. The lake is not owned or controlled by the applicant and is not part of the Snoqualmie Mill PCI Proposal.

Existing Planning & Zoning Designations

The Snoqualmie Mill site comprises slightly more than one-third of the Mill Planning Area, which is defined in the City's Comprehensive Plan, and is primarily zoned Planned/Commercial Industrial (PCI) District. An approximate 39-acre portion of the site, within Planning Areas 1 and 3 is within the FEMA floodway and is zoned Open Space (OS-2). Other portions of the Mill Planning Area located south of Mill Pond Road, including Borst Lake (Mill Pond), are also zoned OS-2; this area is not included in the proposed PCI Plan. As noted previously, an approximate

15.7-acre area in the northern portion of Planning Area 2 is within the City's UGA but has not yet been annexed or zoned by the City.

The PCI District permits a wide variety of commercial, light industrial and manufacturing, warehousing, institutional, and office activities; heavy industrial uses are not permitted. A mix of uses is allowed, including residential uses on the second floor of mixed-use buildings. Thirty-five percent of the acreage of PCI-designated sites must be dedicated to open space and natural uses. The zoning code encourages imaginative master planned designs, and PCI-zoned properties may request deviations from most development standards.

The OS-2 zone, located south of Mill Pond Road, permits a variety of parks and active recreation uses, including regional recreational uses such as golf courses, community centers, agricultural uses, public utilities, and parking.

Annexation Policies & Planning

Snoqualmie Mill Ventures, LLC purchased the site from Weyerhaeuser in 2010 and commenced the procedures required to annex the site to the City of Snoqualmie. Based on prior planning and interlocal agreements between King County and the City, the site was recognized as appropriate for annexation. The City also began developing and adapting planning, policy, and regulatory documents to provide a framework for annexation and eventual development. This planning framework is summarized below and described in greater detail in Draft EIS Section 3.7 – Consistency with Plans and Policies.

Pre-Annexation Agreement

In 2011, the applicant, Weyerhaeuser, and Ultimate Rally entered into a Pre-Annexation Agreement with the City of Snoqualmie. The annexation area included the Snoqualmie Mill site and an additional area owned by Weyerhaeuser. The agreement identified zoning districts that would become effective upon annexation. The Mill site, which is located within the floodplain, was zoned Planned Commercial/Industrial (PCI), while areas within the floodway were zoned for open space. The hillside on the eastern boundary of the annexation area was zoned Planned Residential; by City action, the hillside portion was rezoned to PCI in 2016. Existing uses were permitted to continue, but no new uses would be permitted until several actions occurred, including: an update of the annexation policies in the City's Comprehensive Plan; preparation of a Post Annexation Implementation Plan (AIP) by the property owner and approval by the City; and completion of review and approval of a PCI Plan for the Snoqualmie Mill site, including review according to SEPA.

Other major requirements of the Pre-Annexation Agreement applicable to the various parties included the following:

- Dedication of property to the City for a Riverwalk trail corridor and the Snoqualmie Valley Trail;
- Prohibition on use of the annexation area for a motor racetrack or speedway;
- Submittal of a Sensitive Areas Study within 30 days of annexation; and

- Protection and potential adaptive re-use of the Powerhouse structures remaining on the site.

The site was annexed to the City in 2012. The required Sensitive Areas Study was submitted within the required timeframe and was recently updated. The status of the agreement's requirements is discussed in this and other sections of the EIS.

Removal of the Weyerhaeuser Log Sort Yard Berm

Starting in the mid-1980s, when the Mill site was still within unincorporated King County, Weyerhaeuser began constructing an earthen berm on the western portion of the Mill site adjacent to Mill Pond Road. The berm, which is located within the floodway and floodplain of the Snoqualmie River, was intended to prevent floodwaters from entering the site and from floating away stored logs. Additional fill was subsequently added behind the berm, when earth and bark/log debris that had accumulated in the aisles between log stacks was scraped up, hauled off, and pushed to the back of the log deck aisles where it merged with the existing berm. These activities reportedly continued into the 1990s, after closure of the mill.

The City of Snoqualmie has pursued a variety of actions to address the rise in floodwaters that the berm has caused. The City's actions have included multiple complaints to King County's Department of Development and Environmental Services (DDES), alleging that the additional fill behind the berm was placed in violation of King County code requirements; performance and submittal to DDES of independent studies to demonstrate that the fill placed behind the berm within the floodplain has increased the base flood elevation; and successive appeals and requests for reconsideration to the King County Hearing Examiner. All of these actions were unsuccessful; King County concluded that pursuit of a code enforcement action against Weyerhaeuser for removal of the berm and fill from the Mill site was not warranted, and that there was insufficient cause to reopen the County's earlier determinations to not undertake code enforcement action. In 2006, the berm was breached and some of the fill was removed.

Beginning in 1994, when the Mill site was included in Snoqualmie's UGA, the City began developing planning policies that contemplated future redevelopment of the site to address the site's environmental constraints, including flooding. When the site was annexed to the City in 2012, the City's Comprehensive Plan required preparation of a Post Annexation Implementation Plan, which would, among other issues, address flooding and the berm. Applicable policies are discussed in the following subsection and in Draft EIS Section 3.7 – Consistency with Plans and Policies.

An AIP for the Snoqualmie Mill site, discussed above, was approved by the City in 2016. The Snoqualmie Mill PCI Plan application, submitted to the City in 2017, includes a grading plan for the site that would completely remove the log sort berm. Numerous comments submitted on the Draft EIS mentioned removal of the berm and illegal fill as requirements of agreements or City policies. Chapter 3 of the Final EIS provides responses to those comments, clarifies applicable City policies, and reiterates that the proposed grading plan would remove the berm. The proposed development plan for the site included in the PCI Plan application also provides large areas of open space that would provide compensatory storage of floodwaters and achieve

no net rise in the base flood elevation. Flooding issues are addressed in Draft EIS Section 3.3 – Water Resources.

Comprehensive Plan Annexation Policies

In 2014, the City revised the Comprehensive Plan to establish an updated policy framework for planning and permitting development of annexed lands (Vision & Policy Plan, Section 8, Objective 7.8, and policies 7.8.1 through 7.8.9). A key change was to require approval of annexation implementation plans (AIPs) as tools to help pre-plan development within annexed areas, including the Snoqualmie Mill site. As conceived, the AIP would portray proposed land uses and the location of road networks and important utility systems, including a review and update, if necessary, of adopted utility sewer, water, and storm drainage plans. AIPs were defined as living documents that could be revised over time based on ongoing site planning and environmental review, evolving policy, and in response to changing land use, housing, and employment needs. All future development proposals would be required to substantially conform to the approved AIP.

The Comprehensive Plan includes several requirements specific to the Mill Planning Area, which encompasses the Snoqualmie Mill property, that must be addressed in the AIP. These include preservation of floodway functions; protection of unique natural features and viewsheds; assessment of contamination and cleanup requirements; buffering of residential or open space uses from visual and noise impacts from the adjacent gravel quarry and wastewater treatment plant; a comprehensive transportation analysis; a plan and commitment to provide trail right-of-way to connect local and regional trails; removal of the berms; and protection of the City's north wellfield from potential contamination.

Although the AIP requirement was conceived as a technique to pre-plan areas prior to annexation, the Comprehensive Plan also recognized that this might not always be feasible. Therefore, when site planning was still ongoing and a proposed annexation was not accompanied by a development proposal, the City could defer the AIP requirement until after annexation. As previously noted, the Pre-Annexation Agreement stated specifically that no development could occur on the Snoqualmie Mill site until an AIP was approved by the City, a PCI Plan was submitted and approved, and SEPA review was conducted.

Post Annexation Implementation Plan (2016)

The applicant submitted an AIP to the City in March 2016. It was titled "Post Annexation Implementation Plan" to emphasize the City's acknowledgment that master planning for the site and preparation of a PCI Plan had not occurred prior to annexation and would not occur until after the plan was approved. The AIP, therefore, reflects only a preliminary analysis of current site conditions, land use plans, and utility systems.

The AIP identifies the status of the conditions contained in the Pre-Annexation Agreement, and documents whether they have been completed, are in progress, or require additional analysis to address. It addresses each of the Comprehensive Plan's annexation policies, identifies a generalized spatial organization and program of land uses on the site, and evaluates the

capacity of water, sewer, and storm drainage systems serving the site. The AIP also includes the applicant's commitment to prepare an environmental impact statement (EIS) to evaluate proposed development.

The AIP was reviewed by the Planning Commission, which recommended approval, and was subsequently approved by the City Council on November 28, 2016 (Resolution 1370, AB 16-153). Master planning of the site and preparation of a PCI Plan application began following this action. This EIS provides updates to elements of the AIP where appropriate.

PCI Plan Application & State Environmental Policy Act (SEPA) Review

A PCI Plan application was submitted to the City on March 22, 2017 and was determined to be complete on April 19, 2017. The applicant's voluntary commitment to prepare an EIS for the Snoqualmie Mill Proposal was included in the Post Annexation Implementation Plan and the PCI Plan application.

The City, as lead agency for SEPA compliance, issued a combined Notice of Application and Determination of Significance/Scoping Notice on May 3, 2017. An open house and scoping meeting were held on May 23, 2017. Following consideration of scoping comments submitted by interested agencies, tribes, and the public, the City established the scope of the analysis and alternatives reflected in this EIS.

The Draft EIS was published on April 27, 2020, with a 45-day comment period. A virtual meeting to receive public comment was held on May 20, 2020. In response to requests, the City extended the comment period to July 10, 2020. The process for review and comment of the Draft EIS is also addressed in responses to comments in Chapter 3 of the Final 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. Phased review allows environmental review to occur in stages, and to be coordinated with the phases of master planning for a proposal. SEPA analysis of a project, or portions of a project, that is still in the conceptual stage of planning may be evaluated broadly and more generally in an initial environmental document, followed by more detailed and focused analysis in subsequent environmental documents as more detailed plans are developed.

The planning process for the Snoqualmie Mill site is congruent with a phased approach to SEPA review. The PCI Plan includes varying levels of detail for the site's three planning areas; greater detail is provided for Planning Area 1 and lesser, more conceptual detail for Planning Areas 2 and 3. The varying detail reflects the long-term time horizon for site development, the scale and level 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 stages of development. Greater project detail will be provided for Planning Areas 2 and 3 over time as site planning continues. Supplemental environmental analysis and documentation will occur as master planning leads to more detailed information about later phases of development.

Some individual elements of the original 2017 PCI Plan application have changed as a result of ongoing planning, but the Proposal is fundamentally the same. For example, the mix of land uses has changed somewhat but the same basic types of land uses are proposed; the locations of some roads have changed; and an outdoor performance venue is no longer part of the Proposal. The PCI Plan application will be amended to reflect the current Proposal following review and comment on the EIS and any subsequent changes to the PCI Plan.

2.3. PROPOSAL & ALTERNATIVES

2.3.1. Objectives of the Proposal

The applicant has identified the following objectives for the Proposal. These objectives have guided planning of the site, are reflected in the application, and have been used to develop alternatives considered in the EIS.

- Develop the site consistent with the Pre-Annexation Agreement, the Post Annexation Implementation Plan, and the policies of the Snoqualmie Comprehensive Plan.
- Plan the site to accommodate approximately 1.85 million gross square feet of commercial and industrial uses to provide a substantial number of jobs, consistent with the historic use of the site as an employment center and with its Comprehensive Plan designation, and to enhance the City and regional economies.
- Provide residential uses proximate to jobs to enable residents to work close to home and improve the balance between work and quality of life.
- Redevelop the site in phases over approximately 10–15 years with a mix of primarily commercial and industrial uses.
- Protect and enhance the site's environmental resources.
- Preserve and integrate open space into development plans for the site to provide area for flood storage, habitat, environmental mitigation, and passive recreation.
- Respect the site's history by preserving and/or integrating valuable elements of this history in development plans where feasible.
- Cleanup, reuse, and revitalize a "brownfield site" to create a community asset.
- Endeavor in Planning Area 1/Phase 1 to create a node of complementary and/or related businesses that can span production, warehousing, and retail related to a single type of industry, such as wine production or outdoor sports and recreation equipment. Integrate these uses with residential uses along a pedestrian-oriented "main street" area within a compact village center.
- Support the City's efforts to encourage tourism in the Snoqualmie Valley through the planned mix of land uses.

- Implement City policies for sustainable development through site planning that addresses natural resources, historic resources, energy efficiency, and floodplain management.

2.3.2. PCI Plan

The PCI Plan application contains varying degrees of detail for different areas of the site, which reflects a phased approach to master planning and development. Master planning initially focused on Planning Area 1 and, therefore, provides greater detail for the first phase of development. Because detailed site planning has not yet occurred for Planning Areas 2 and 3, more general information is available for these portions of the overall site. Additional site planning, analyses, and supplemental environmental review will occur for Planning Areas 2 and 3 when more specific development proposals are created. Refer to the discussion of phased environmental review in Section 2.2.

The description of the PCI Plan in this and the subsequent subsection addresses the overall site at a general level and Planning Area 1 with greater detail. The EIS similarly discusses environmental impacts for the overall site at a more general level and Planning Area 1 in greater detail.

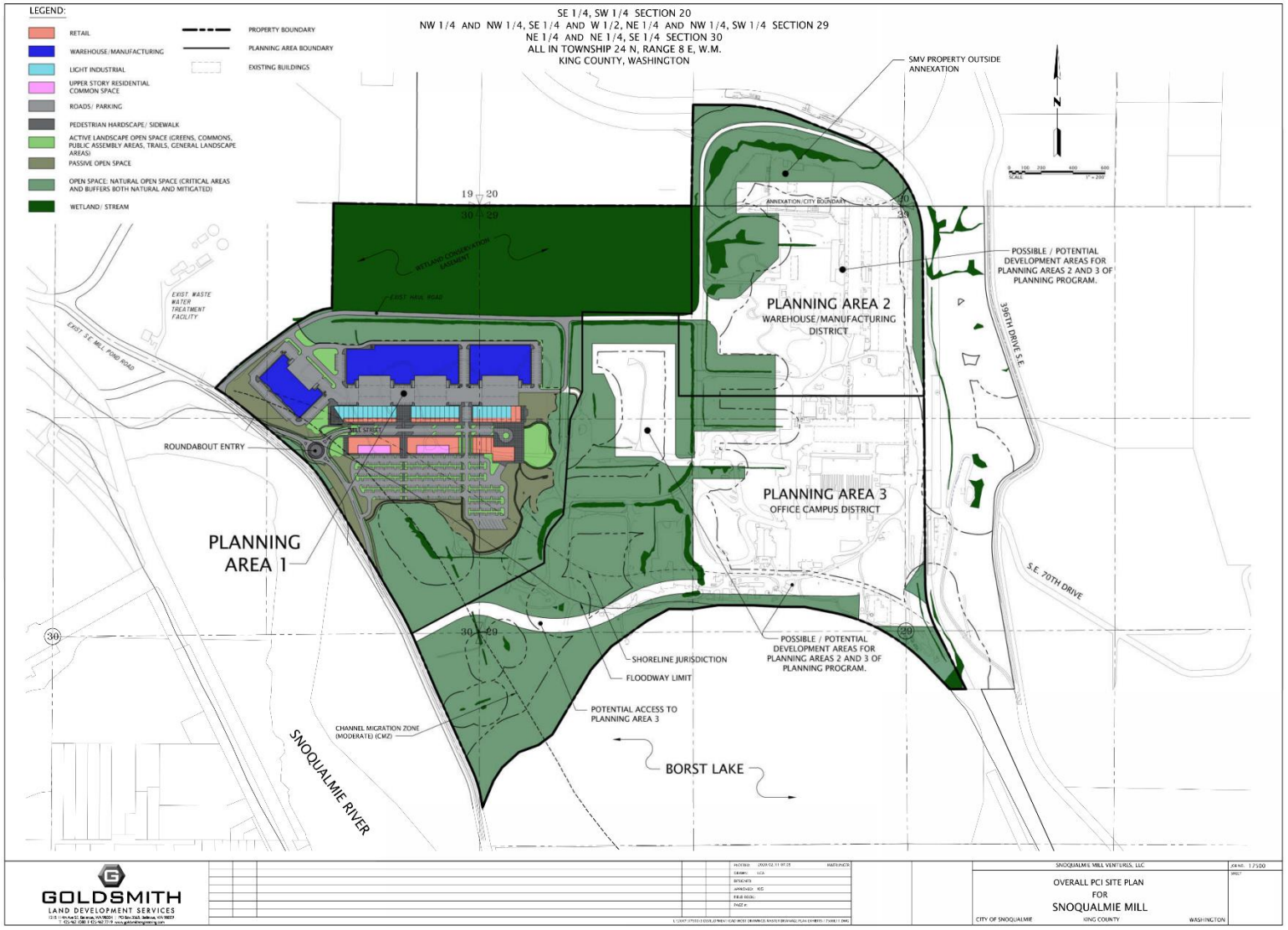
Approximately 15.7 acres in the northern portion of Planning Area 2 is currently located within unincorporated King County. This area would be annexed to the City prior to submittal of a development application that includes the area; most of the 15.7 acres would be retained as open space. It is included in the PCI Plan at this time to provide a more complete overview of planned development.

Land Use

The PCI Plan for the overall Snoqualmie Mill site is shown graphically in Exhibit 2.3-1 and described in the following narrative. The site is divided into three planning areas based on existing site conditions, including the locations of environmental constraints and opportunities, and identified development potential for different land uses over time. The sequence of planned development is based on each area's proximity to existing urban development and facilities, the location of critical areas, developable area needed for different development types and forms, and identified market opportunities.

Development of the site would occur in three general phases, over an approximate 10-to-15-year period. Each planning area is equivalent to a phase of development; each phase/planning area could be developed in two or more sub-phases. For the EIS analysis, Planning Area 1/Phase 1 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 2 years. Development timing will depend on market and economic conditions and infrastructure requirements and is less certain for Planning Areas 2 and 3.

Exhibit 2.3-1. PCI Plan



Source: Goldsmith 2018

The intensity of proposed development of the overall site, as measured by planned amounts of developed area/impermeable surfaces, is quite low compared to many planned industrial sites and the development standards of the PCI District. (Note that numbers are rounded in the following description.) Approximately 37% (95 acres) of the 261-acre site would be developed with buildings, roads, and other impervious surfaces, while 63% of the site (166 acres) would be undeveloped and dedicated to passive open space, landscaped areas, trails, habitat, constructed wetlands, wetlands/streams and buffers, and compensatory flood storage.

Planning Area 1, which comprises approximately 102 acres, is most proximate to currently developed areas of the City and to existing infrastructure and contains wetlands and open space. Planning Areas 2 and 3 are located farther from currently developed areas and contain greater amounts of identified sensitive areas, including regulated wetlands, streams, and areas that require further assessment and remediation of contaminated soils prior to development. Infrastructure will also need to be extended relatively longer distances and/or expanded to serve these planning areas. A large, undeveloped portion of Planning Area 3 (approximately 63 acres), located in the central area of the site, is planned to function as a conservation corridor devoted to passive open space, wildlife habitat, wetland mitigation, and compensatory flood storage. Almost two-thirds of the overall site (166 acres) would be devoted to various types of open space and compensatory flood storage.

Exhibit 1.4-1 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, and subject to an overall maximum of 1.83 million square feet of gross leasable area. As described further below, the building footprint area would be approximately 50,000 square feet greater than leasable area, reflecting common areas, utility space, etc.

The Proposal's land use mix emphasizes various categories of commercial, warehouse, and light industrial/manufacturing activities. Current planning and marketing for Planning Area 1 is focused on tenants who would produce and store wine, along with wine-related retail uses. Manufacturing and warehouse activities would comprise approximately 37% of total development (leasable area) and 46% of Planning Area 1 development. Based on leasable area, corporate campus office/ institutional use could be the largest potential land use on the site and could locate in Planning Area 3 later in the sequence of site development. At full buildout, using typical ratios of employees per square foot, the site could support approximately 3,410 jobs.

Retail and commercial uses are proposed in Planning Areas 1 and 3 and would comprise approximately 5% of total site development. The range of anticipated uses includes restaurants and specialty retail uses related to on-site industrial production (e.g., tasting room/wine store or outdoor equipment sales). A conditional use permit could be required to allow wine tasting rooms. An indoor event space for weddings, parties, and corporate retreats would be integrated into the mixed-use portion of Planning Area 1. An average of one event per week is assumed, generally on weekends.

For the most part, developed portions of Planning Areas 2 and 3 are each devoted to a discrete category of land use — warehouse/manufacturing and campus/office, respectively. Some restaurant uses would be included to support on-site workers; a restaurant could also be developed near the historic Powerhouse building.

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

Land Use	Planning Areas			Site Totals 1
	1	2	3	
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 [63%]
Roads/Other Impervious[5]	22 acres [22%]	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 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 for PCI Plan calculations without the unincorporated parcel.

Source: Goldsmith 2018, 2020

Planning Area 1, however, would be developed for a mix of employment, retail, and residential activities, organized in a pedestrian-oriented village center adjacent to a "main street." Approximately 160 housing units are proposed on the second and higher floors of mixed-use

buildings; residential uses may require a conditional use permit or could be authorized per the code's PCI and planned unit development (PUD) review processes. Apartments would be for rent, at market rates, and would be a mix of one- and two-bedroom units, averaging approximately 835 square feet in area. Some units would be workforce housing with residential units above and connected to commercial space. The mixed-use concept for Planning Area 1 is described further below.

A distinction in the calculations in Exhibit 1.4-1 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 Exhibit 1.4-1 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 Exhibit 1.4-1 are 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 that are related to site coverage, such as 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 apply to planned development in Planning Areas 2 and 3. As noted previously, the calculations of area/acres in Exhibit 1.4-1 are based on building footprints.

The development data in Exhibit 1.4-1 are based on the development plan for the Snoqualmie Mill site as a whole, including future development of the 15.7-acre parcel in Planning Area 2 that is located in unincorporated King County but within the City's UGA. The unincorporated parcel is excluded from the PCI Plan development application submitted to the City; this parcel would need to be annexed before the City could take any action on a development application. Exhibit 2.3-3 shows land use and site information for the PCI Plan excluding the 15.7-acre parcel located in King County. Exhibit 2.3-3 is a companion to Exhibit 1.4-1; differences in the data are minor. The analysis in the EIS, it should be noted, is based on the overall PCI Plan and development of the entire site over time, as reflected in Exhibit 1.4-1.

It should be noted that the PCI Plan does not propose to construct and operate an outdoor performance center. This land use is considered only in the context of the Redevelopment Alternative and only for purposes of analysis; it is not an element of the proposed action. This

distinction is also noted in Final EIS Chapter 3, in responses to comments received on the Draft EIS.

Exhibit 2.3-3. Snoqualmie Mill Development Plan – Total Site Excluding the 15.7-acre Portion that is Not Annexed (Gross Leasable Area/Gross Acres[1])

Land Use	Planning Areas			Site Totals [1]
	1	2	3	
Warehouse/Manufacturing	280,000 sf	372,900 sf		652,900 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	372,900 sf	825,000 sf	1,800,000 sf
Building Footprint Area (Gross)	11 acres [11%]	5 acres	19 acres	35 acres [14%]
Open Space[4]	69 acres [68%]	22 acres	63acres	154 acres [63%]
Roads/Other Impervious[5]	22 acres [22%]	13 acres	21 acres	56 acres [22%]
Total Area	102 acres	40 acres	103 acres	245 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, and 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.

Source: Goldsmith 2018, 2020

The DirtFish driving school is an existing use that is permitted to continue operating consistent with the terms of the adopted Pre-Annexation Agreement. The driving track extends over portions of the Snoqualmie Mill site. The PCI Plan and the Redevelopment Alternative would both displace portions of the DirtFish track in increments, as each planning area develops; DirtFish operations will be displaced entirely when Planning Area 3 develops. In the interim, the track will be reconfigured, and portions relocated in increments, to permit operations to continue. The timing and location(s) of any reconfigured segments of the driving track have not been identified by DirtFish and are not known at this time. Any proposal by DirtFish to reconfigure its driving track would be independent of the Snoqualmie Mill PCI Plan and subject to separate permitting and review.

Building Types & Design – Design Guidelines

Specific buildings have not yet been designed. Individual parcels within the property will be sold to developers who will design individual buildings. Building design would not occur until a development plan for the site is approved and building permit applications are prepared. As is common in planned commercial and industrial developments, the Snoqualmie Mill property owner will draft conditions, covenants, and restrictions (CC&Rs) that will apply to all parcels of land on the property and will govern internal management and development of the site. A property owners association will be created to manage and maintain the property, and to enforce the CC&Rs. Conditions of approval and mitigation measures adopted by the City will also apply to individual parcels.

The applicant will create a set of site-specific design guidelines that apply to all buildings and other improvements constructed on the property. The guidelines will contain narrative and illustrative graphics, and will define the owner's objectives for site planning, architectural design, building materials, energy efficiency, landscaping, signage, lighting, street level uses, street furnishings, public art, and other design features and amenities. The guidelines will also incorporate applicable City standards and adopted conditions of approval. An architectural review committee will be established by the owner to review the design of development proposals for individual parcels before they are submitted to the City for review and approval. The proposed design guidelines will be submitted as part of a revised application package.

Although individual buildings have not been designed, examples of the types and general forms of buildings are identified for purposes of analysis in the EIS. The design concept is intended to echo the industrial history of the site. There are numerous examples in the US and Canada of old industrial districts and brownfield sites that have been planned and redeveloped with a mix of uses similar to that proposed for Snoqualmie Mill. Yaletown and Granville Island, in Vancouver, B.C., and River North in Denver, CO are popular examples.

Industrial and warehouse buildings would generally be constructed of fabricated metal and glass with wood or brick trim and detailing, and pitched roofs. Individual single-use buildings in these categories could be up to approximately 55 feet high (measured from average grade) to accommodate planned types of uses. Building of this height would require a deviation from the existing 40-foot height limit in the PCI District. The district regulations encourage creative design and anticipate that the general standards may be modified in the context of individual plans. Building height, scale, and bulk are discussed in Draft EIS Section 3.9.

The applicant will continue to investigate the economic and engineering feasibility of adapting and reusing the historic Powerhouse building and the Planer building. Potential use of those buildings is not currently included in the land use program, however.

Office buildings in Planning Areas 2 and 3 would be constructed by a corporate or institutional user, who would determine building materials and design consistent with the Snoqualmie Mill property design guidelines. Office buildings could also be up to 55 feet (4–5 stories) in height.

Several mixed-use buildings are proposed along the main street in the Planning Area 1 village.

These would be 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. Residential units would be located on the second floor or higher, above flex space, which would be a mix of retail, office, and light industrial. Residential units would be for rent at market rates and would be a mix of one- and two-bedroom units.

Open Space Retention & Landscape Plan

Preserving open space is a key element of the PCI Plan, and development would be focused on a relatively small portion of the site. As noted previously, almost two-thirds of the site would remain undeveloped and dedicated to open space, trails, landscaped areas, wetlands (including restored and enhanced buffers), habitat, and compensatory flood storage. Landscaping is intended to help knit these multiple open space uses together with planned development.

Exhibit 2.3-4 shows an overall landscape plan, which is focused on Planning Area 1 at this time. Plant species in major open space areas would consist primarily of native trees, shrubs, groundcovers, and grasses that reflect the existing vegetation of the site and its natural surroundings. A planting list will be included in the design guidelines. Selected landscape areas throughout the site and parking lot are planned to be used as natural filtration areas, providing pollutant removal, stormwater infiltration, and wildlife habitat. The placement of buildings and landscape features will also be planned and designed to preserve and highlight important on-site view corridors of historic and natural features.

Landscaping would also serve to coordinate the types and locations of plantings with site uses and functions. For example, plant species such as hops and grapes could be planted along Hops Avenue and Vine Avenue pedestrian ways to reinforce the wine-related building uses they lead to.

A landscaped open space is also proposed west of the re-aligned portion of Mill Pond Road, adjacent to the Snoqualmie River and the stormwater outfall. A conceptual plan for this area is shown in Exhibit 2.3-5. The pavement of the abandoned portion of the road would be removed and revegetated to provide additional wildlife habitat.

The trail system within Planning Area 1 is described further in the next subsection.

Exhibit 2.3-4. Overall Landscape Plan

Source: Weisman Design Group 2018

Exhibit 2.3-5. River Outfall Landscaping

Source: Weisman Design Group 2018

Roads & Trails

Roads

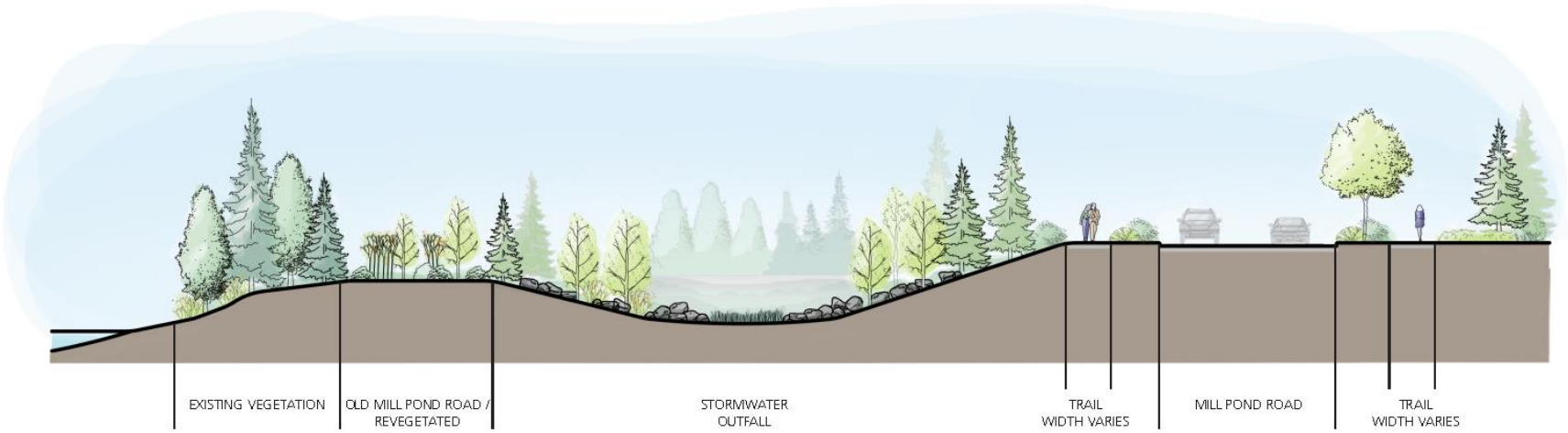
Primary access to the site would be from SR 202 and Mill Pond Road. As shown on Exhibit 2.3-1 and Exhibit 2.3-6, a portion of the existing Mill Pond Road would be re-aligned and moved farther to the north and east. A roundabout would be constructed at the entrance to Planning Area 1 and would provide access to Mill Street, the main street through the Planning Area 1 mixed-use area. Internal streets and drive aisles would connect to individual buildings and parking areas. The pavement from the abandoned/reconstructed portion of existing Mill Pond Road would be removed and converted to open space, landscaping, wildlife habitat, and a recreational trail. A viewing lookout would also be constructed adjacent to the river, overlooking the stormwater outfall.

A second access road, connecting Mill Pond Road to Planning Areas 2 and 3 and generally indicated on Exhibit 2.3-4, would be constructed to support these subsequent phases of the Proposal. Exhibit 2.3-5 shows a landscaping concept for this portion of the site. The new road would be a public road built to City standards.

Exhibit 2.3-7 shows the proposed design of Mill Street, which travels through the mixed-use area. The street would contain two travel lanes, with angle parking on both sides. Sidewalks would be 20 feet wide (measured from building façade to curb) on the north side and 12 feet wide 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 applicant.

Heavy truck traffic associated with Planning Area 1 will use the internal drive aisle adjacent to the warehouse area for access to and from the site. The drive aisle connects to a portion of the private haul road and Mill Pond Road northwest of the site. Use of this access route will avoid placing Planning Area 1 truck traffic on Mill Street and the haul road to the north.

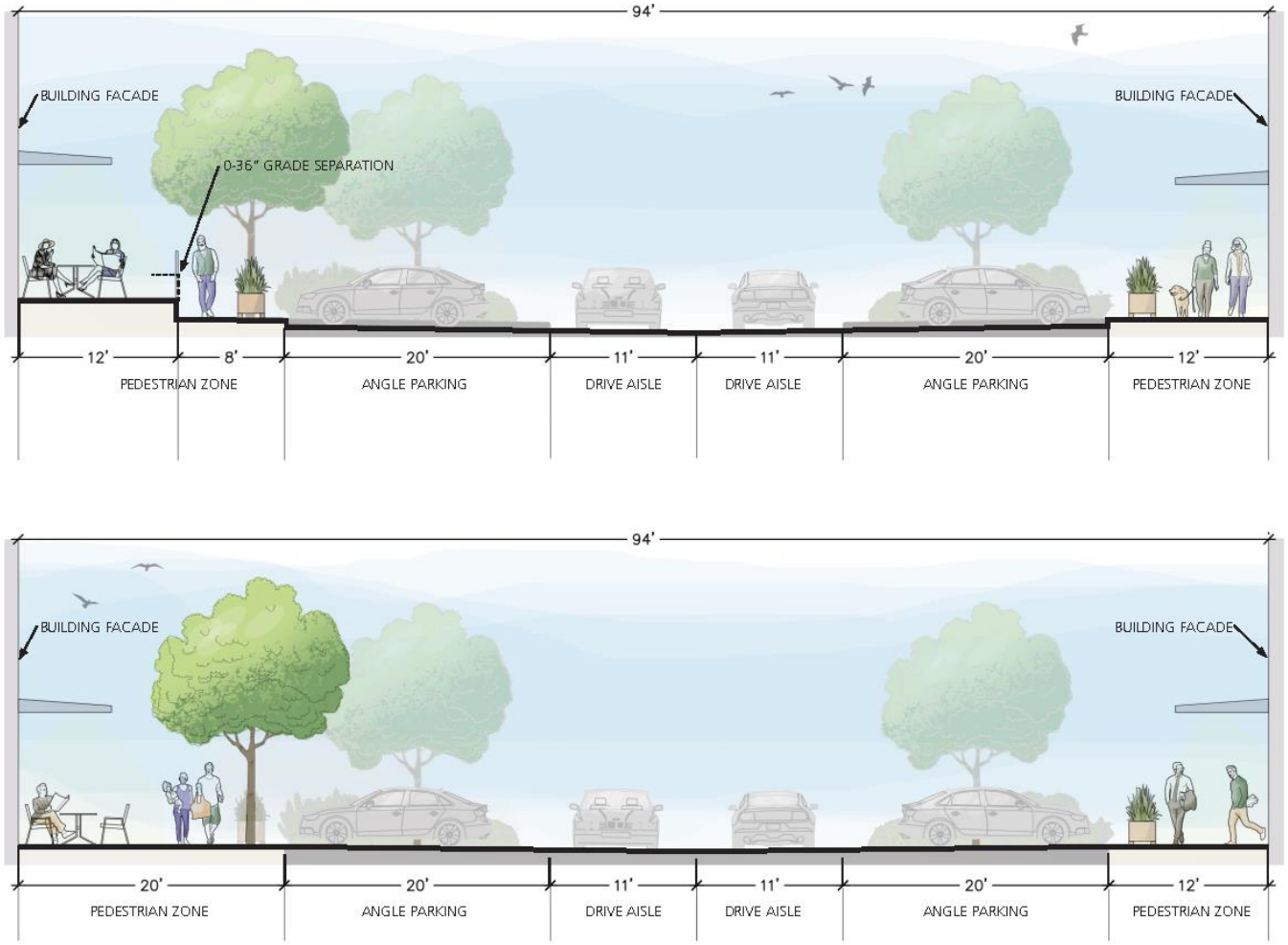
Exhibit 2.3-6. Mill Pond Road Section



SNOQUALMIE MILL MILL POND ROAD SECTION WEISMANDESIGNGROUP

Source: Weisman Design Group 2018

Exhibit 2.3-7. Mill Street Section



SNOQUALMIE MILL | MILL STREET SECTION, FACING EAST | WEISMANDESIGNGROUP

Source: Weisman Design Group 2018

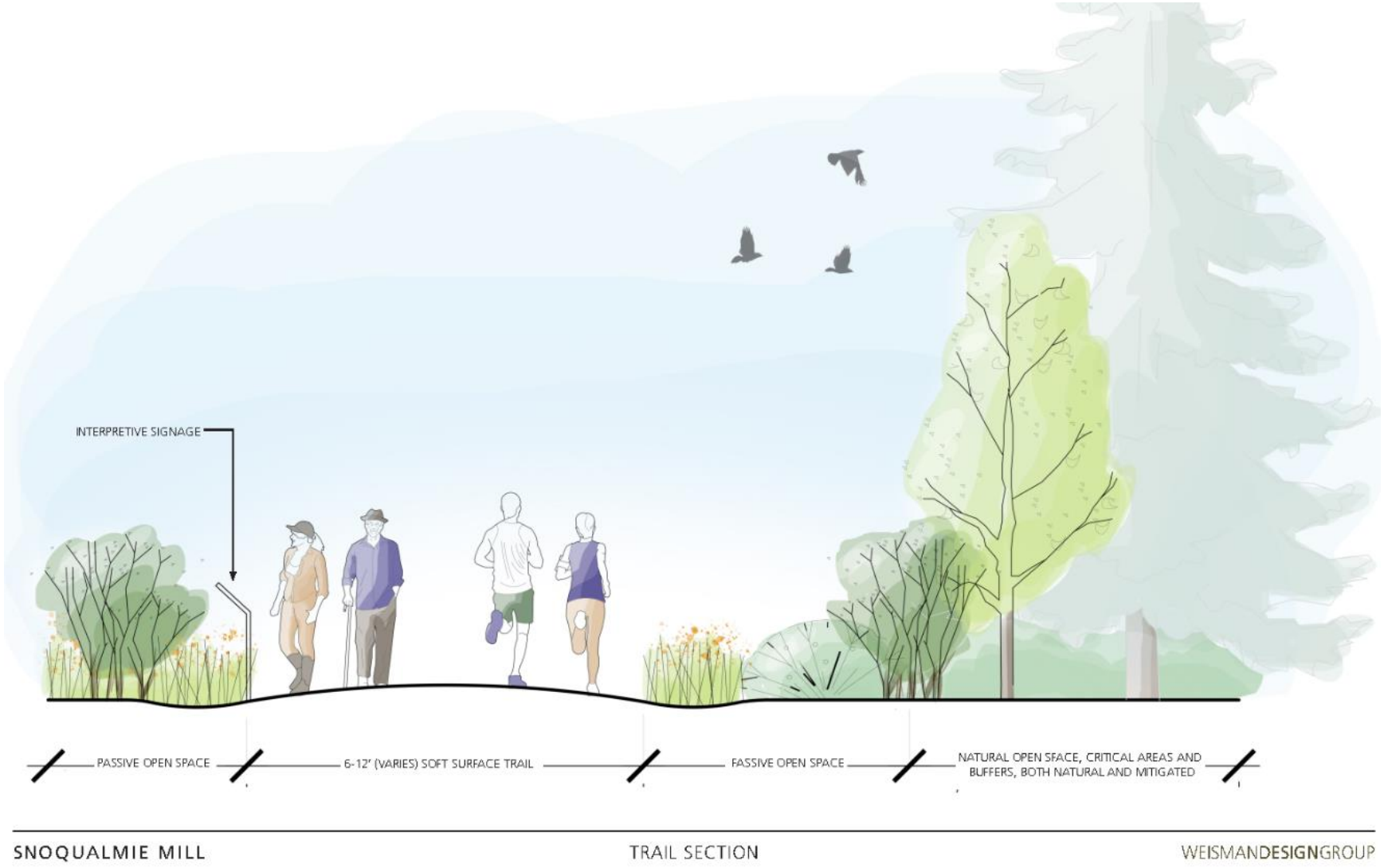
Planning Area 2 truck traffic, however, would use the haul road to the north. The haul road is bounded by wetlands and streams and would be difficult to widen or improve without affecting critical areas. Pedestrian facilities and curbs would not be proposed in conjunction with any widening due to the primary use of the haul road by heavy trucks and identified environmental limitations. The need to widen the haul road in spots and resulting effects on critical areas would be evaluated in greater detail in conjunction with development planning for Planning Area 2.

Replacement and expansion of the existing SR 202 bridge crossing the Snoqualmie River is included in the City of Snoqualmie Transportation Improvement Plan (for 2019–2024). The project is not included in WSDOT's current Capital Improvement Plan, however, and is not funded at this time. The existing bridge has sufficient capacity to support proposed development of Planning Area 1 (see Section 3.11 of the Draft EIS); however, a new bridge would be necessary to support traffic associated with full buildout of the Snoqualmie Mill PCI Plan. Planning, design, and funding for a new bridge would require a cooperative effort among the City, WSDOT, and the applicant; additional environmental review would also need to occur. The timing of this improvement is uncertain at this point. The Draft EIS Transportation section (3.11) and Final EIS Chapter 3 contain additional information about the new bridge and related improvements.

Pedestrian Trails

A planned system of trails would provide on-site pedestrian connections and recreational opportunities. Future pedestrian connections and extensions of the trail system are generally indicated on the landscape plan, including a connection to the City's planned Riverwalk Trail and a segment and connection to the regional Snoqualmie Valley Trail; specific trail locations cannot be identified with certainty at this time. The landscape plan will be expanded in increments to provide detail for subsequent phases of development as detailed site planning extends across the balance of the property. Exhibit 2.3-8 shows a section of the trail.

Exhibit 2.3-8. Trail Cross Section



Source: Weisman Design Group 2018

On the Snoqualmie Mill site as a whole, the trail system would be focused in the large central open space area in Planning Area 3; more detailed planning and design for these future trails would occur in conjunction with ongoing planning for Planning Area 3. The Snoqualmie Mill trail system would also provide connections to the City's planned Riverwalk Trail to the south, and to King County's regional Snoqualmie Valley Trail to the east.

Exhibit 2.3-4 identifies approximately 5,000 linear feet of trails and walkways that are planned in Planning Area 1 and adjacent to the Snoqualmie River west of Mill Pond Road. (Note that this trail calculation does not include pedestrian paths within Planning Area 1's parking area or sidewalks along Mill Street.) Approximately 2,600 linear feet of soft-surfaced trails would be located in Planning Area 1 within open space areas, on the south and east sides of the parking area and around the lawn area. As shown on Exhibit 2.3-8, trails would vary from 6 to 12 feet in width.

Exhibit 2.3-5 reflects the conceptual landscaping plan for the area along Mill Pond Road adjacent to the Snoqualmie River. Approximately 2,400 linear feet of hard surface trail/sidewalk would be constructed along both sides of the re-aligned Mill Pond Road in this general location.

Parking

Off-street parking would be provided in surface lots located adjacent to planned buildings. The site plan proposes 2,974 parking spaces, which is slightly more than required by City code for the categories of land use proposed (see SMC Chapter 17.65.040). Parking supply for Planning Area 1 includes 854 spaces; some on-street parking would be located along the main street, but primarily in a surface lot located south of the residential buildings. Parking lot landscaping and lighting would be provided according to requirements of the City code.

Wetland Buffer Restoration & Enhancement

Virtually all of the wetland buffers in Planning Area 1 are highly degraded, and are affected by existing roads, other impervious surfaces, compacted fill, and sparse vegetation. Wetland buffers are discussed in detail in Draft EIS Section 3.4, Plants and Animals, and Appendix C. The wetland mitigation concept incorporated in the PCI Plan proposes to enhance currently degraded wetland buffers as mitigation for focused buffer intrusions or reductions, while avoiding significant impacts to the wetlands. The objective is to produce a net benefit to wetland water quality and habitat functions for the site as a whole. Overall, the plan would provide more wetland buffer than is required by the City's critical areas regulations. Almost 18 acres of wetland buffer would be enhanced and/or restored. Enhancement would consist of plantings of native trees, shrubs, and herbaceous species. This same concept would be applied to buffers adjacent to the Snoqualmie River, west of Mill Pond Road, and to wetlands in future planning areas. The buffer plan would retain a large, forested area around the wetlands in the southern portion of Planning Area 1 and provide a habitat corridor connecting on-site wetlands to Mill Pond and the Snoqualmie River. Planning Area 1 would also construct an underpass under the re-aligned Mill Pond Road to facilitate wildlife movement and the movement of floodwater.

The proposed enhancement strategy is based on provisions in the PCI District zoning regulations, which provide the City Council with discretion to approve deviations from some development standards in the City code when deviations would advance the purposes of the district and when consistent with protection of health, safety, and the environment (SMC 17.20.050.I). The critical areas regulations also authorize enhancement and mitigation plans (SMC 19.12.170. F & H2). The proposed approach is discussed in greater detail in Draft EIS Section 3.4 – Plants and Animals, and in Appendix C of the Draft EIS. A detailed mitigation plan (including a monitoring program) meeting the requirements of the code would be submitted in conjunction with a building permit application.

Development in the Floodplain

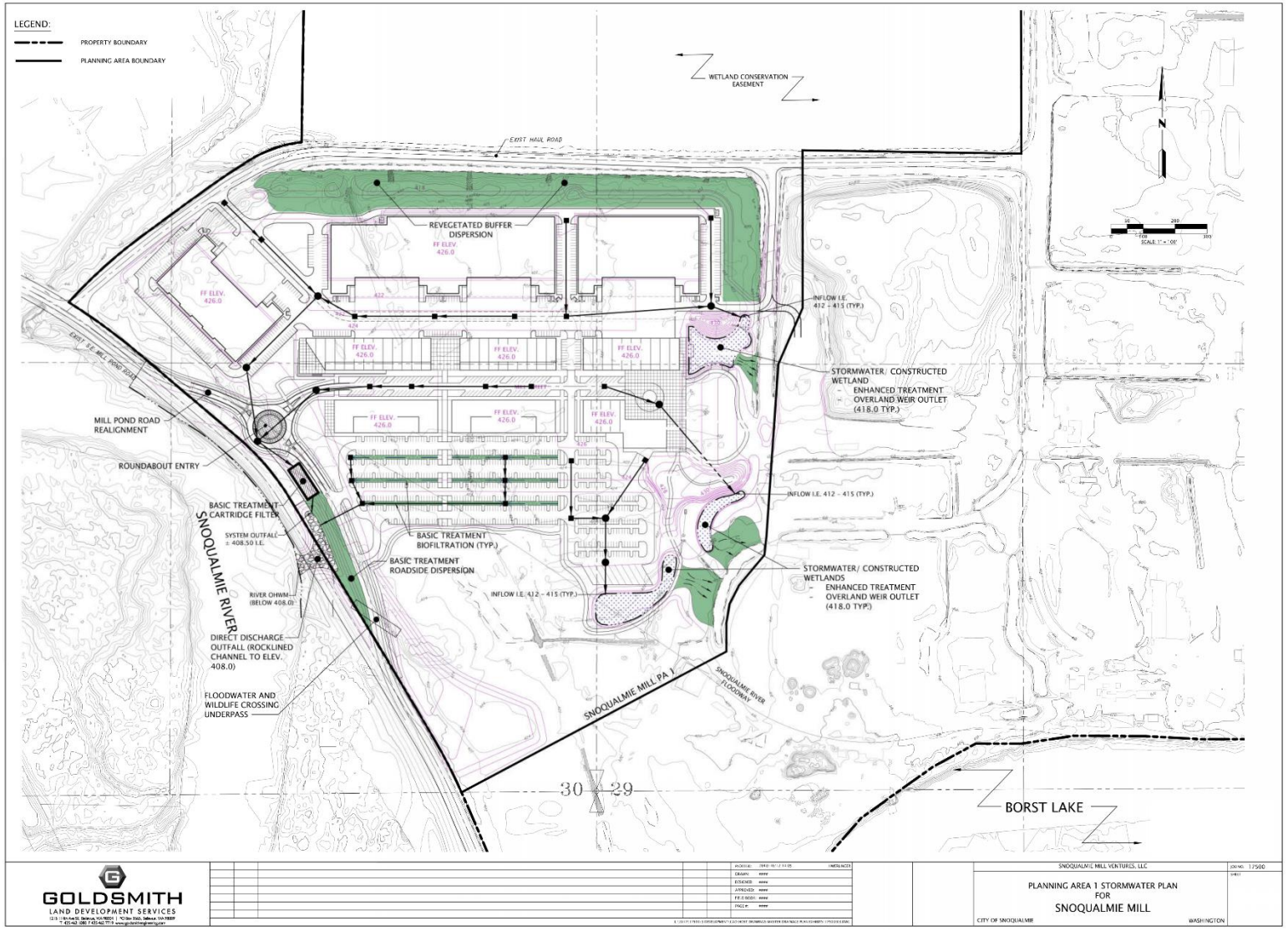
The Snoqualmie Mill site is within the 100-year floodplain of the Snoqualmie River; a portion of the floodway extends into the western and southern portions of Planning Area 1. A small portion of Planning Area 3 is also within the floodway and zoned Open Space (OS); it would not be developed. Construction of buildings and other facilities in the floodplain would displace flood storage and would require actions to ensure no net rise in flood elevations; mitigation is required by City and FEMA regulations. Preliminary engineering estimates indicate that approximately 400,000 cubic yards (cy) of displacement (fill) could occur, and an equal volume of compensatory storage will be created to ensure no increase in flooding. The project's stormwater management plan, relatively low intensity of development, maintenance of extensive open space, grading of some open spaces, and removal/over-grading of the railroad berms, are complementary elements of a plan to avoid any rise in flood elevations. A detailed analysis of flood impacts is included in Draft EIS Section 3.3 – Water Resources.

Draft EIS Section 3.1 – Earth Resources describes the characteristics of on-site soils and identifies the construction and engineering approaches that would be used to address soil limitations, including the site's floodplain location, the presence of extensive fill, and identified geologic hazards, including soils susceptible to liquefaction or movement during earthquake events.

Stormwater Management

The Snoqualmie Mill site stormwater management plan is shown graphically in Exhibit 2.3-9**.** The Master Drainage Plan (MDP) document is included in Draft EIS Appendix A. Draft EIS Section 3.15 – Utilities discusses stormwater management in detail. The proposed stormwater system will be constructed by the applicant, then dedicated to, and operated and maintained by, the City.

Exhibit 2.3-9. Stormwater Management Plan: Planning Area 1



Source: Goldsmith Engineering, 2020.

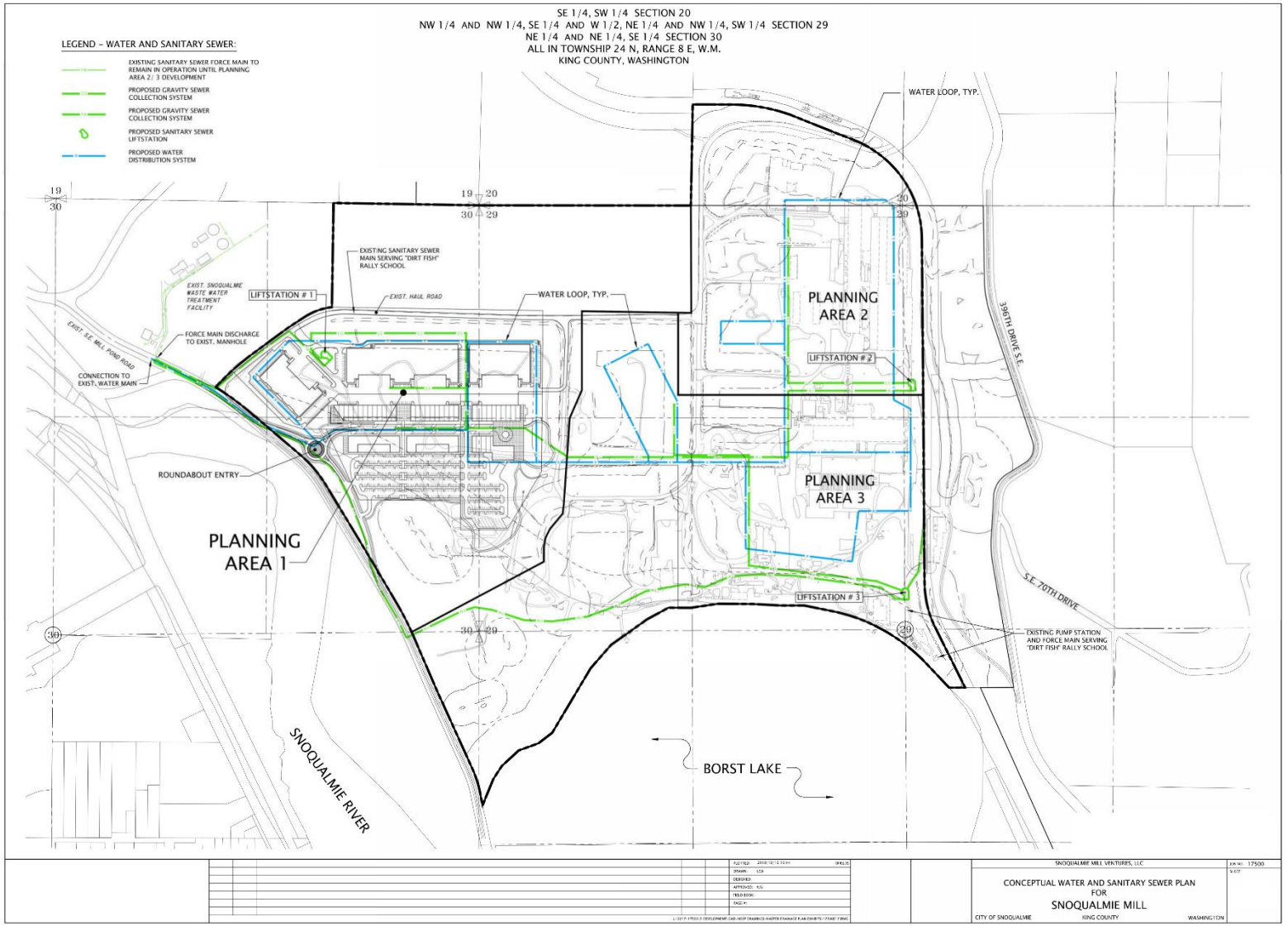
The MDP was guided by the 2016 *King County Surface Water Design Manual* (KCSWDM), and the 2012/2014 *Department of Ecology Stormwater Manual for Western Washington* (Ecology Manual). The plan for managing stormwater includes conveyance, treatment, and discharge. Stormwater runoff would be collected from buildings, roads, parking areas, and other impervious areas; conveyed and treated as described further below; and discharged to the Snoqualmie River through a constructed outfall and/or through on-site and off-site wetlands and streams to maintain wetland hydrology, and via constructed wetlands. The Ecology Manual and KCSWDM designate the Snoqualmie River as appropriate for direct discharge. Conveyance would occur through a combination of channels, swales, and pipes. Stormwater treatment methods would include dispersion through wetland and stream buffers, biofiltration swales, media filters, and constructed stormwater wetlands. Treated stormwater would drain to conveyance channels located in the large central open space area for discharge to on-site streams, Borst Lake (Mill Pond), and primarily to the Snoqualmie River. Perimeter areas along the north and east portions of Planning Area 1, including the berms, would be graded and revegetated to allow sheet flow dispersion of runoff from perimeter roads and parking areas.

Utilities – Sewer & Water Service

Conceptual utility plans are described in Draft EIS Section 3.15 – Utilities and shown in Exhibit 2.3-10. The Proposal would connect to the City's sewer and water systems, which currently provide service to the Mill site. The Snoqualmie Mill sewer system would use a combination of gravity flow to collect wastewater and lift stations to convey wastewater to the City's wastewater treatment plant, which is located just northwest of the Mill site. Three lift stations are proposed, one located in each planning area. The Planning Area 1 lift station would be constructed in conjunction with, and to serve development of, Planning Area 1, but it would be designed to be upgraded when Planning Areas 2 and 3 come online. Section 3.15 of the Draft EIS evaluates wastewater system capacity and projected demand associated with the Snoqualmie Mill Proposal.

The Snoqualmie Mill site is also within the City's water service area. The adopted Water System Plan (2013) extends to 2032 and is currently being updated as of this writing. The adopted Water System Plan does not currently include the specific growth associated with the Snoqualmie Mill site and PCI Plan in its projections of future water demand. The revised plan will extend planning to 2040 and will include the population and employment associated with the Snoqualmie Mill PCI Plan. The water service information in the Draft and Final EISs is based on preliminary information provided by the City; it is the best information available at this time. This information indicates that sufficient water supply is available to serve Planning Area 1, but additional water sources and/or some upgrading of parts of the existing water system may be needed to serve some portion of projected growth. Draft EIS Section 3.15 contains a detailed discussion of supply and estimated demand for water associated with the Proposal. Sewer and water utility infrastructure, and the on-site stormwater management system, will be constructed by the applicant, then dedicated to, operated, and maintained by the City.

Exhibit 2.3-10. Conceptual Water and Sewer Plan for the Snoqualmie Mill Site



Source: Goldsmith Engineering, 2020.

Sustainability

"Sustainable development" is one of the central themes of the City's vision articulated in the Snoqualmie 2032 Comprehensive Plan. Sustainability is reflected in a "pattern of resource use that meets human needs, while preserving the environment for present and future generations" (City of Snoqualmie, 2014). Components of sustainability, as identified in the adopted Snoqualmie Sustainability Strategy (2010), include the following elements relevant to the PCI Plan: flooding and climate change hazards, energy efficiency, ecosystem protection, land use, green infrastructure and water, green buildings, and economy.

Sustainability principles are reflected in numerous elements of the PCI Plan. Examples include the following. The proposed PCI Plan would:

- Preserve almost two-thirds of the site as open space;
- Avoid direct impacts to wetlands and streams and restore and enhance wetland buffers;
- Balance cuts and fills on-site and avoid any increase in flooding;
- Establish a goal of Leadership in Energy and Environmental Design (LEED) gold or platinum certification to achieve energy efficiency (to be included in the design guidelines, discussed previously);
- Provide a substantial number of jobs and a mix of commercial and residential uses in mixed-use buildings along a pedestrian-oriented main street;
- Be proximate to housing; and
- Generate significant new revenues to the City.

Consistency of the PCI Plan with a range of Snoqualmie policies, including policies related to sustainability, is addressed further in Draft EIS Section 3.7 – Consistency with Plans and Policies, and in individual sections of the Draft EIS that address geology; water resources and flooding; wetlands; air quality and greenhouse gas emissions; land use; wetlands, plants, and animals; sewer and water utilities; population, housing, and employment; and fiscal impacts.

PCI Plan - Planning Area 1

Planning Area 1 is planned to be the first phase of development of the Snoqualmie Mill PCI Plan. It is defined with greater detail in the PCI Plan application and is evaluated in greater detail in the EIS. Please refer to the discussion of phased environmental review in Section 2.3 above.

Exhibit 2.3-11 provides an excerpt of the site plan focused on Planning Area 1. Exhibit 1.4-1 provides quantitative data about planned land uses, which are also described below.

Land Use Concept

Planning Area 1 is a 102-acre area located in the northwestern portion of the Snoqualmie Mill site. The proposed PCI Plan would develop 604,000 square feet of warehouse/manufacturing, light industrial, retail/restaurant, and an event space. Development (buildings, roads, and other

impervious area) would occupy approximately 33% of the planning area (33 acres), and 68% would be retained as open space (69 acres). Large natural open spaces would be located north and south of the developed area, with additional landscaped open spaces integrated into the planning area.

The PCI Plan's land use objective for Planning Area 1 is to develop a complementary mix of commercial, industrial, retail, and residential uses along a pedestrian-oriented main street, within a larger planned development. The main street would be oriented toward Mount Si and encompass views of the historic Planer building and surrounding open space. As shown on Exhibit 2.3-11, industrial and warehouse uses would be located in the northern portion of Planning Area 1; a mix of manufacturing, office, retail, and residential would develop in the middle; and an event center and open space would be located in the south. The congregation of related uses in a compact area would encourage the efficient production, storage, and movement of goods on site, and facilitate interaction with tourists and visitors.

Warehouse uses would comprise close to 50% of land uses in Planning Area 1, and light industrial uses would comprise approximately 20%. The applicant anticipates that a compatible type of light industrial producer, of reasonable intensity and scale, will anchor the industrial element of the planning area and provide support for other uses. Current marketing efforts are focused on a producer of wine or a manufacturer of outdoor clothing or gear. For the environmental analysis, the EIS assumes that the primary industrial user will be a wine manufacturing company, who will also occupy proximate office and warehouse space. This primary user would anchor a wine district and attract other wine producers and related businesses. Compatible and related retail and tourism uses would develop proximate to the production facilities.

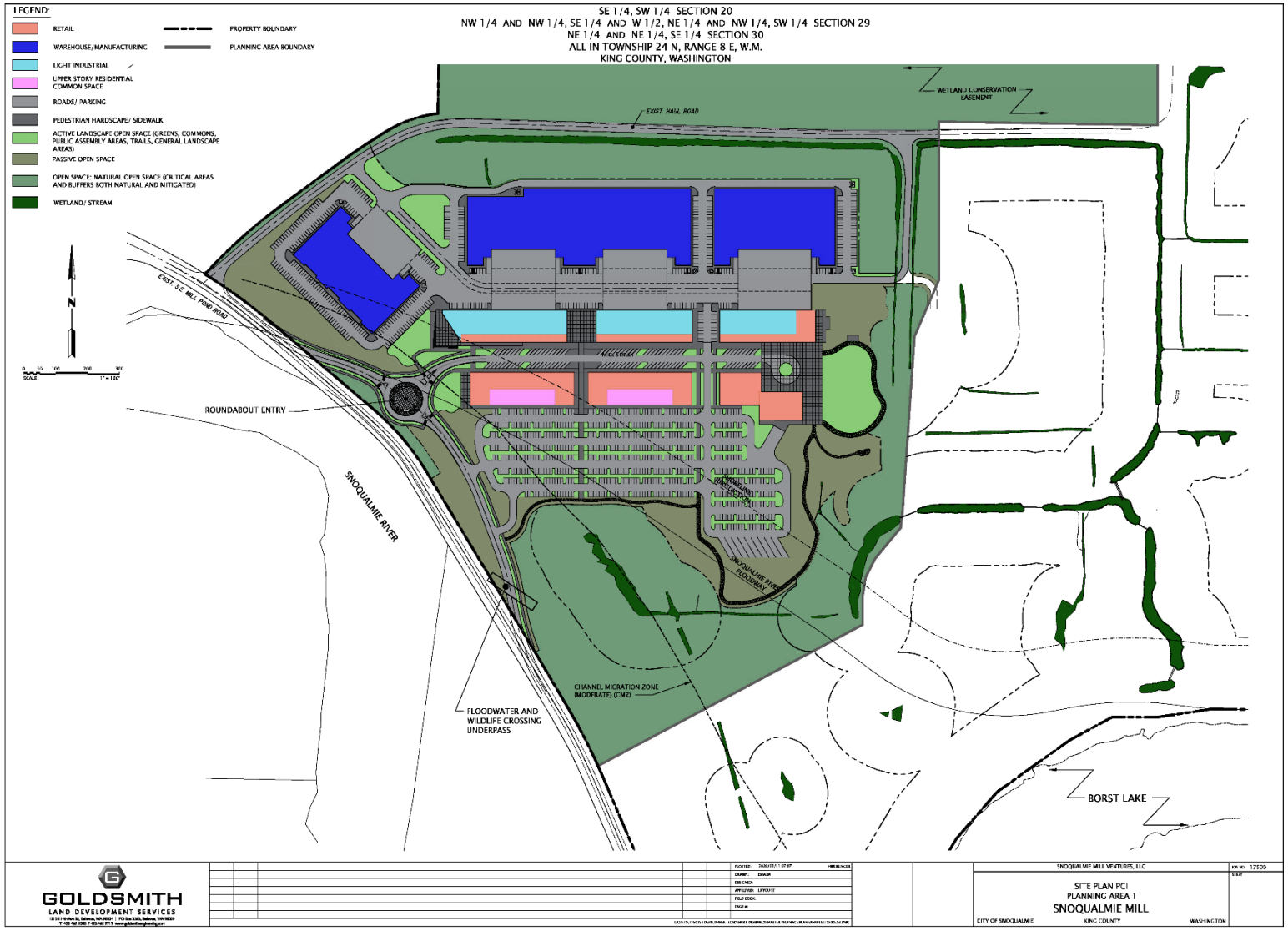
Light industrial "flex space" would accommodate a mix of office, manufacturing, and retail activities within the same building. Assumed uses are within the range of activities permitted in the PCI District.

Commercial uses would include retail establishments, such as wine bars, restaurants, and specialty retail stores, which are compatible with an industrial setting. Some commercial uses would be symbiotic with wine production. The event center would accommodate weddings, corporate meetings and events, and similar activities. For purposes of analysis, an average of one event per week is assumed to occur on weekends, with an average attendance of 100 people.

Residential units would be located on the second (and/or third) floor(s) of mixed-use buildings containing retail, office, and light industrial uses. Residential units would be for rent at market rates and would be a mix of one- and two-bedroom units. Average unit size is assumed to be 835 square feet.

Specific uses within individual buildings will depend on market interest and cannot be predicted with precision at this stage of planning. The EIS has used reasonable assumptions about the types and quantities of various uses, and the operational characteristics and impacts associated with potential uses, including the focus on winemaking in Planning Area 1.

Exhibit 2.3-11. Site Plan for Planning Area 1



Source Goldsmith 2020.

As noted previously and reiterated in Chapter 3 of the Final EIS, an outdoor performance center is not an element of the proposed PCI Plan. It is, however, analyzed in the Redevelopment Alternative but is considered hypothetical and included only for purposes of analysis.

Winemaking Operations

For purposes of analysis, the EIS assumes there will be a total of 12 commercial wineries located in Planning Area 1. Operations are expected to be small and medium size, each producing between 2,000 and 6,000 cases of wine annually; only one winery is assumed to be larger, producing approximately 10,000 cases per year. Total production of all Snoqualmie Mill wineries is estimated to be approximately 47,500 cases per year. These quantities are estimates, since tenants are not known at this time. To provide a sense of scale, Columbia Crest, the state's largest winery, sold 7.75 million cases in 2017; and L'Ecole No. 41, the 12th largest in sales, sold approximately 44,000 cases in 2017. The smallest of the top 50 wineries in 2017 produced more than 10,000 cases (Puget Sound Business Journal, 2018).

The process of making wine occurs in five primary steps. These are described briefly below.

1. Harvesting. The harvesting of grapes would occur off site, typically in Eastern Washington. Grapes would be transported to the site by truck for subsequent processing.
2. Crushing and Pressing. Crushing follows the grape harvest, usually in October. Grapes are sorted, de-stemmed, and crushed, either by foot stomping or, more frequently, by mechanical press. Crushing sometimes occurs outdoors. The crushed grapes produce "must," which is pressed grape juice with skins, seeds, and solids. Crushed red wine is left in contact with the skins to acquire flavor, color, and tannins; the must is loaded into a hopper and taken by conveyor to fermentation vessels. For white wines, the juice is separated from the skins, seeds, and solids. This step typically occurs over one weekend in October.
3. Fermentation. The process of fermentation converts sugar into alcohol. Grapes are fermented in stainless steel tanks or oak barrels; the process takes from one or two weeks, up to one month or longer. Cultured yeasts may be added to aid fermentation. The grape skins are pressed down using a robotic plunger or by hand, using poles. Alternatively, wine from the bottom of the tank may be pumped back over the skins. Sometimes the wine is pumped out of the tank and then back in to introduce oxygen. Tanks may be open or closed (with a vent to allow CO_2 to escape). The remaining skins are pressed to extract any remaining wine.
4. Clarification. Clarification removes solids, yeast cells, and tannins. When fermentation is complete, red wine is drained off the skins and transferred ("racked") into oak barrels or stainless-steel tanks. The wine is clarified through filtration or "fining" (adding substances to clarify and using a filter to capture the larger particles). The clarified wine is racked into another vessel and prepared for aging or bottling.
5. Aging and Bottling. Aging can occur in bottles, stainless steel tanks, or oak barrels, and can take from six months to three years. Some wines use preservatives (sulfur dioxide or potassium sorbate), while others do not.

All Snoqualmie Mill winemaking operations, including crushing, would take place indoors. The finished grade of the buildings housing winery production would be above the base flood elevation. All chemicals used in production, primarily for cleaning winemaking equipment, would be stored in areas designed to contain any accidental spills. Producers would also adopt Spill Prevention and Emergency Response Plans to prevent and address incidental spills. Process wastewater could be pre-treated before conveyance to the City's wastewater treatment plant. However, the City has expressed a preference, based on updated wastewater system planning, to upgrade the wastewater treatment plant to accommodate process wastewater; the applicant would participate in this upgrade.

Building Scale & Character

Buildings will reflect a mix of designs, varying with the functions of the buildings. Industrial production activities will be visible from the street and within mixed-use buildings. Representative design concepts are illustrated in Draft EIS Section 3.9 – Aesthetics, Light, and Glare. Design and materials would echo the site's history. Building materials are anticipated to include fabricated metal, with glass and wood accents. Mixed-use buildings along the main street would be 3–4 stories and wood frame construction. Several large manufacturing/warehouse buildings would be located in the northern portion of the planning area.

Please refer to the previous discussion of the overall PCI Plan for additional information.

Roads & Trails

A roundabout would be constructed at the site entrance on Mill Pond Road and would provide access to Mill Street, the main street through the mixed-use village center. The village will be pedestrian-oriented, with sidewalks and pedestrian amenities, including benches, street trees, planters, and ornamental lighting.

A drive aisle adjacent to the warehouse uses connecting to the existing haul road to the west is included in the site plan. Truck traffic associated with industrial and warehouse uses in the northern portion of the planning area would use this route; this would avoid placing heavy trucks on Mill Street or the haul road to the north. Additional private streets and drive aisles would connect individual building sites and parking areas to Mill Pond Road.

In 2016, prior to submittal of the PCI Plan application, the City and the applicant executed a development agreement that addressed some future transportation impacts. The agreement requires a voluntary payment to the City to mitigate anticipated impacts from the initial phase of development of Snoqualmie Mill (600,000 square feet) to the Tokul Road roundabout.

Several initial segments of Snoqualmie Mill's planned trail system would be constructed in Planning Area 1 and would provide pedestrian connections to the extensive trail system planned in the central open space area, and to development in Planning Areas 2 and 3. Most pedestrian activity in Planning Area 1 would be focused along Mill Street in the mixed-use village center.

Please refer to the prior discussion of Roads and Trails for the overall PCI Plan and associated exhibits (Exhibit 2.3-6, Exhibit 2.3-7, and Exhibit 2.3-8) for additional information.

Parking

Parking areas shown on Exhibit 2.3-1 are sufficient to accommodate employees and visitors anticipated to use planned buildings and would meet City off-street parking standards (see SMC Chapter 17.65.040). The size of parking areas could be modified somewhat to reflect subsequent building plans.

Wetland Buffer Restoration & Enhancement Plan

The proposed approach to restoring and enhancing degraded wetland buffers in Planning Area 1 and adjacent to the Snoqualmie River is described in Section 2.3 above.

Development in the Floodplain

Based on initial earthwork estimates, Phase 1 development would involve filling approximately 50–60% of Planning Area 1 and would displace an estimated 100,000 cubic yards of flood storage. Proposed open space and grading would create an estimated 150,000 cubic yards of compensatory storage and would ensure no net rise in flood elevations.

Detailed geotechnical analysis, described in Draft EIS Section 3.1 – Earth Resources, identifies appropriate techniques for construction on the site's soils within the floodplain. All residential units would be on the second floor or higher, as required by the City's flood hazard regulations.

Stormwater Management

The first phase of development would include construction of a piped outfall to the Snoqualmie River, which would be located near an existing culvert beneath Mill Pond Road; this culvert currently conveys drainage from a wetland in the conservation easement area on the north side of Planning Area 1 north of the haul road; see Exhibit 2.3-9. A conveyance channel would also be constructed along the west side of the realigned Mill Pond Road to collect runoff from the open space area and treatment facilities. The stormwater system would be privately owned and maintained and separate from the City system.

Utilities

Sewer and water service for Planning Area 1 are described in Section 2.3 above.

EIS Alternatives

In addition to the proposed PCI Plan, two alternatives have been developed based on SEPA requirements and the applicant's stated project objectives: the No Action Alternative and a Redevelopment Alternative. The purpose of an alternative in an EIS is to provide a comparison to the Proposal and to explore opportunities for impact mitigation. While the alternative articulates a theoretically possible development scenario, it is not a plan that is proposed or desired by the applicant. Note that Section 2.4 below describes three additional alternatives that were considered for evaluation in the EIS.

No Action Alternative

SEPA requires that an EIS contain a No Action Alternative. For Snoqualmie Mill, "no action" means that the proposed action, the PCI Plan, would not go forward, and the City would not act on the Proposal. Since City policies and regulations require approval of a PCI Plan as a prerequisite for redevelopment, no redevelopment of the Mill site would occur under this scenario. Existing on-site uses, including DirtFish Rally and other uses identified in Section 2.2, would continue indefinitely, as permitted by the Pre-Annexation Agreement. While redevelopment is likely at some point in the future, it is not assumed in the near term or in the context of the current Proposal. The No Action Alternative in the EIS primarily serves as a baseline against which the Proposal and other alternatives can be measured.

Redevelopment Alternative

An alternative site plan and redevelopment program (the Redevelopment Alternative) is shown in Exhibit 1.4-2 and Exhibit 2.3-13. The alternative includes 1.85 million square feet of gross leasable area, which is generally comparable to the Proposal, but with a different land use mix and emphasis. Open space and building/impervious site coverage would be comparable to the proposed PCI Plan – 63% and 37%, respectively (numbers rounded). Building layout in Planning Area 1 would also be comparable to the proposed PCI Plan, as would the timing and phasing of development. Holding the development amount, site coverage, sequence, and timing of development constant is intended to help focus on the environmental consequences of changing the mix of land uses.

Land use in the Redevelopment Alternative would be predominantly warehouses combined with manufacturing and light industrial use, these land use categories would comprise 80% of total development, compared to 45% for the PCI Plan. Compared to the proposed action, retail and office uses would be reduced, and a smaller indoor event space would be developed. Residential units would be 25% fewer than the PCI Plan. Compared to the proposed PCI Plan, total development in Planning Area 1 would be less and development in Planning Area 3 would be somewhat greater. Like the PCI Plan, Planning Area 1 would focus on wineries and compatible, related uses.

The Redevelopment Alternative includes an outdoor performance space in the southeast portion of Planning Area 3. It assumes approximately 3.7 acres of landscaped open space with a constructed stage, with capacity for approximately 5,000 people. An average of two performances per week are assumed, from June through September, typically on weekend evenings. (These assumptions are based on the 2017 concert program at the Chateau Ste. Michelle winery in Woodinville, which is comparable in area and capacity.) All parking would occur on site. Planning Area 3 is not expected to develop until the later stages of site development (approximately 2030–2032).

The Redevelopment Alternative could generate approximately 54% fewer jobs than the PCI Plan (1,570 jobs for the alternative compared to an estimated 3,410 jobs for the Proposal), which is a result of the lower employment density (i.e., average jobs per square feet of space) associated with warehouse and industrial uses compared to office uses. In terms of

environmental consequences, fewer jobs would also result in reduced impacts to many elements of the environment, including traffic, water consumption, public services and facilities, and utilities. A change in the types of land uses and fewer jobs could also result in reduced tax revenues to the City. Analysis of the Redevelopment Alternative will enable and permit decision makers and the public to consider these types of comparisons and trade-offs.

Similar to the PCI Plan, building footprint area for the Redevelopment Alternative would be approximately 25% larger than the gross leasable area shown in Exhibit 1.4-2. Increases would total approximately 46,500 square feet and would be specific to the mixed-use residential and retail buildings and uses in Planning Area 1. The building footprint area in Planning Area 1 would total 634,500 square feet, and total site development would total 1,898,200 square feet.

Exhibit 2.3-12. Redevelopment Alternative (Gross Leasable Area)

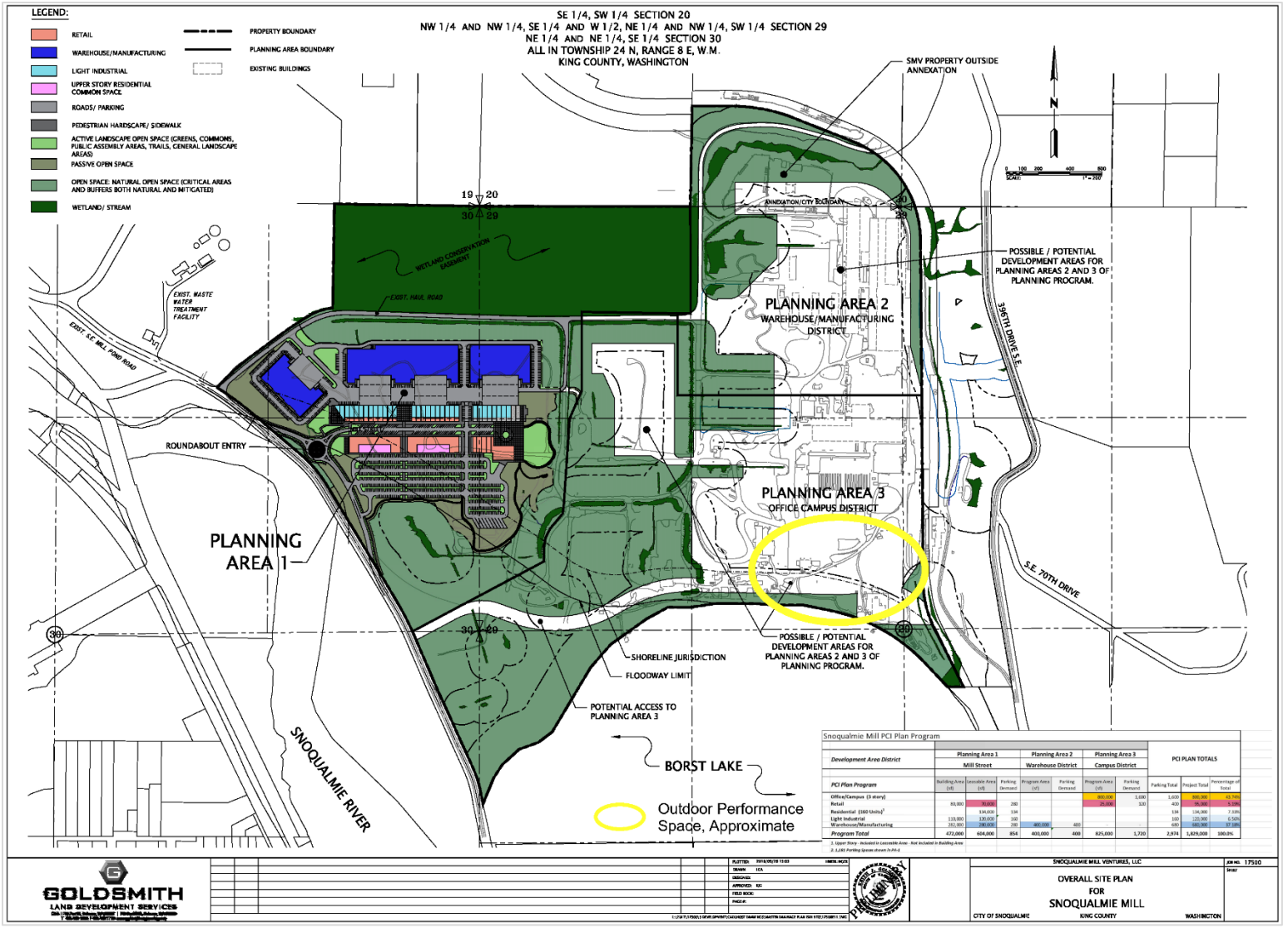
Land Use	Planning Areas			Total [1]
	1	2	3	
Warehouse/Mfg	291,000 sf	390,000 sf	715,000 sf	1,396,000 sf
Light Industrial	96,000 sf			96,000 sf
Retail/Restaurant	82,000 sf	-	-	82,000 sf
Office	-	-	156,000 sf	156,700 sf
Residential [2]	104,000 sf	-	-	104,000 sf
Outdoor Performance Space [3]	-	-	2,000 sf (stage)	2,000 sf
Event Center	15,000 sf	-	-	15,000 sf
Totals	588,000 sf	390,000 sf	873,000 sf	1,851,700 sf

[1]Numbers rounded.

[2]Assumes 120 market rate rental units in a mix of one- and two-bedroom units, averaging 835 sf.

[3]Assumes a 3.7-acre landscaped/grass open space area with a permanent stage (2,000 sf) and a capacity for approximately 5,000 people. An average of two concerts per week are assumed to occur, primarily on weekend evenings from June through September. (Assumed frequency is based on the 2017 concert schedule for the Chateau Ste. Michelle winery in Woodinville, which is comparable in area and capacity.)

Exhibit 2.3-13 Site Plan for the Redevelopment Alternative



Source: Goldsmith 2018; BERK 2019

2.4. ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED REVIEW

Three additional potential alternatives to the proposed PCI Plan were considered for the Final EIS. These alternatives were developed in response to ongoing project planning and to comments on the Draft EIS received from agencies, tribes, organizations, and individuals. They were explored for purposes of environmental review, and do not represent proposed changes to the PCI Plan. The alternatives include: (1) reduced building footprint; (2) a Modified Land Use Scenario with reduced site area and reduced development amount; and (3) relocation of the realigned portion of Mill Pond Road farther from the Snoqualmie River. Implementation of the Proposal on an alternative site is not required by SEPA (WAC 197-11-440(5)(d)) and has not been analyzed. The major features and impacts of these potential alternatives are described below.

2.4.1. Reduced Building Footprint Scenario

This scenario considered whether it is feasible to further reduce site coverage by buildings and other impervious surfaces, which is approximately 33% of the site for the PCI Plan; the balance of the property would remain in open space and compensatory flood storage. This level of site coverage is quite low for a commercial/industrial project involving large-footprint buildings, which is commonly in the range of 80% to 90%. The low site coverage that was achieved for Planning Area 1 was based on preserving and enhancing critical area buffers to protect wetlands and streams. The Draft EIS found that these resources would not be negatively impacted by the proposed development given the improved buffers that would be provided. Therefore, further reductions in building or parking area footprints were not expected to substantially reduce impacts.

2.4.2. Modified Land Use Scenario

This potential alternative is intended to explore and compare how the mix of on-site activities could affect environmental impacts compared to the proposed PCI Plan. The main features of the alternative include further modification of the mix of land uses, including elimination of some specific uses, a reduction of the overall site area, and a reduction in the amount of site development. It was hypothesized that modifying land uses in this manner would reduce impacts meaningfully, particularly to transportation and potentially to other elements of the built environment (i.e., noise, land use, population and employment, public services, and sewer and water demand).

Land uses for this alternative are listed in Exhibit 2.4-1. The alternative includes approximately 1.81 million gross square feet (gsf) of development, which is 22,000 gsf less than the PCI Plan and almost 45,000 gsf less development compared to the Redevelopment Alternative. Development in Planning Area 1 would be reduced by approximately 15,000 gsf compared to the Redevelopment Alternative, and by more than 30,000 gsf compared to the proposed PCI

Plan. Building footprints and impervious surface for Planning Area 1 are assumed to remain the same (11 acres total) as the proposed PCI Plan. Access would be the same as for the PCI Plan.

Land uses in the Modified Land Use Scenario would emphasize the development of warehouse, manufacturing, and industrial uses, and shift away from mixed-use residential, retail, and tourism-oriented activities. Wineries would still occur in Planning Area 1, and they could integrate tasting rooms in their manufacturing facilities. No residential units are included in the alternative; the mixed-use residential building would be developed for flex-space (a combination of office and light industrial). A conditional use permit for the residential building would not be necessary. The indoor event space would not be included.

An outdoor performance center and associated improvements and impermeable area (approximately 2,000 square feet) were not included as elements of the Modified Land Use Scenario.

The 15.7-acre parcel currently located outside the City limits, in unincorporated King County, would be removed from the PCI Plan, which would reduce the overall site area of the Modified Land Use Scenario by approximately 15.7 acres (approximately 4 acres developable and 11.7 acres open space). The City of Snoqualmie cannot authorize any development on the unincorporated parcel, and the PCI Plan would need to be amended in the future to add it. While this parcel could be annexed at some time in the future, no plan or timetable currently exists for annexation.

The total site area for the Modified Land Use Scenario, without the unincorporated parcel, would comprise 245 acres. Planning Area 2 would shrink by 15.7 acres and would comprise approximately 49 acres. Open space would be reduced by approximately 11.7 acres, compared to the Redevelopment Alternative, and would comprise approximately 62% of the site.

Exhibit 2.4-1. Modified Land Use Scenario - Land Uses (gross floor area in square feet)

Land Use	Planning Areas			Total [1]
	1	2	3	
Warehouse/Manufacturing	410,000 sf	363,000 sf	715,000 sf	1,488,000 sf
Flex (Office/Lt. Industrial) *	163,000 sf	-	-	163,000 sf
Office	-	-	156,000 sf	156,000 sf
Residential	-	-	-	-
Retail	-	-	-	-
Event Center	-	-	-	-
Outdoor Performance	-	-	-	-
Total	573,000 sf	363,000 sf	871,000 sf	1,807,000 sf

*Flex: 30,000 gsf office, 133,000 gsf light industrial.

The land use changes included in this alternative would reduce total jobs to approximately 1,371—approximately 200 fewer jobs compared to the Redevelopment Alternative, and almost 2,000 fewer jobs than the proposed PCI Plan.

Several comment letters contained suggestions about EIS alternatives. In addition, the PCI Plan proponent considered adding an additional land use alternative. It was hypothesized that the changes in land use, a reduction in development, and a reduction in employees and residents incorporated into this alternative would result in a meaningful difference in impacts, particularly for transportation, and the evaluation began with this element.

Transportation

A preliminary transportation analysis of the Modified Land Use Scenario was performed and is summarized below. The Modified Land Use Scenario could reduce traffic generation considerably at buildout; reductions would range from 20% to 50%, depending on the development phase and time period analyzed. (Data tables are contained in Appendix C of the Final EIS.)

Despite these reductions in overall traffic generation, however, the preliminary analysis showed that AM and PM peak hour level of service (LOS) and delay would generally be almost the same as the PCI Plan and Redevelopment Alternative for most intersections, both for Planning Area 1 and at buildout. Compared to the PCI Plan, there would be some slight reductions in delay (less than 1 second in most cases) at numerous intersections, but the differences are not significant and would not affect LOS, with a few exceptions. Required mitigation for Planning Area 1 and buildout would be substantially the same as for the proposed PCI Plan.

The minor changes in LOS and delay identified in the preliminary analysis are explained by three primary factors: (1) the effects of modified land uses on trip distribution and assignment, (2) changes in the timing and distribution of trips entering and leaving the site, and (3) a reduction in internal trips due to the elimination of residential and most retail uses. Weekend traffic related to events at the performance venue for the Redevelopment Alternative would be eliminated, and tourism-related traffic would be reduced in general due to the reduction in retail. But the conclusion of the preliminary analysis was that transportation impacts as measured by LOS and delay, which are the primary determinants of impacts in the EIS analysis, would not noticeably improve under the Modified Land Use Scenario relative to the proposed PCI Plan or the Redevelopment Alternative.

Natural Environment

Impacts to elements of the natural environment would not be reduced because building footprints and impervious surfaces are not assumed to be modified, except for the unincorporated parcel.

Built Environment

Some minor reductions to elements of the built environment would occur. The reductions of population and employment, for example, would reduce demand on some public services, such

as parks and schools. As shown in Exhibit 2.4-2, demand for water would be approximately 50% lower compared to the PCI Plan, both for Planning Area 1 and for buildout. Wastewater loads related to winemaking would be the same. Although the potential change in fiscal and economic impacts has not been modeled, the direction of change with the Modified Land Use Scenario compared to the PCI Plan and the Redevelopment Alternative would include the following: slightly lower tax revenues resulting from less total development (construction-related sales taxes and property taxes); reduced population and associated spending on goods and services, resulting in reduced sales tax revenues; a reduction in service costs including public safety costs; a reduction in employment and business-related revenues; and a reduction in tourism-related spending and tax revenues.

Exhibit 2.4-2. Modified Land Use Scenario Water Demand

	Planning Area 1		Buildout	
	ADD*	ERU**	ADD	ERU
Proposed PCI Plan	45,960	239	157,900	799
Modified Land Use Scenario	26,320	141	81,210	414

*Average Daily Demand.
**Equivalent Residential Unit.

In summary, the Modified Land Use Scenario would result in impacts to some elements of the built environment that are incrementally reduced but which overall are the same as or similar to the PCI Plan and Redevelopment Alternative. Construction impacts to all elements of the environment could be reduced by a small amount, corresponding to the reduction in developed area and building space. On balance, the resulting reduction in impacts was not considered substantial enough or different enough to warrant including the Modified Land Use Scenario in the Final EIS as a new EIS alternative.

2.4.3. Move Mill Pond Road Farther from the Snoqualmie River Scenario

Several comments received on the Draft EIS suggested moving the realigned section of Mill Pond Road farther away from the Snoqualmie River, outside of the channel migration zone (CMZ) or outside the floodplain. These comments expressed concerns primarily about potential water quality impacts (from stormwater and potential spills) and impacts to critical areas.

There are several constraints to the feasibility of this option, including the existing road location, road design considerations, and the presence of critical areas across the site. The relocation of Mill Pond Road is constrained by fixed locations of the existing road alignment on the north and south ends. The north end is a fixed location of the road crossing of Stream 1 and the City's wastewater treatment plant. The south end is fixed by the existing road alignment as it parallels the west edge of Borst Lake (Mill Pond). The eastern limit of the proposed relocated road is constrained by road geometrics and Wetland 28. The entire site is located within the

CMZ and the floodplain, so moving the road would not reduce potential impacts to these hazards.

Given these constraints, moving the road farther away from the river would not make an appreciable difference in stormwater volume, water quality or temperature, or impacts to other elements of the environment.

2.4.4. Conclusion

The first two of these potential alternatives were suggested in comments on the Draft EIS, and the other, the Modified Land Use Scenario, was suggested by the proponent. None were considered suitable to carry forward for detailed analysis as alternatives in the EIS. The additional alternatives considered are either not practicable or not reasonable, would not reduce environmental impacts overall to a greater degree than the current Redevelopment Alternative, or would simply shift impacts slightly without reducing them.

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3.0 Responses to Comments Received on the Draft EIS

INTRODUCTION

The City provided an extended public comment period for the Snoqualmie Mill PCI Plan Draft EIS. The comment period was extended to 45 days at the outset and was then extended for an additional 40 days in response to public requests. A total of 125 written comment letters/emails were received, containing more than 1,000 individual comments. Some individuals and organizations submitted multiple letters. The City held a virtual public meeting during the comment period at which 21 people provided verbal comments; many of the meeting comments duplicated comments provided in letters or emails from the same commenters. All comment letters and emails that were received from agencies, tribes, organizations, and individuals during the comment period are contained in Appendix A of this Final EIS.

The following paragraphs explain how this chapter of the Final EIS is organized and is intended to help the reader navigate the comments and responses. Many comments that were received on the Draft EIS identified concerns about common topics or issues, and responses are categorized and organized in the Final EIS according to these issues. This approach to organizing responses is intended to reduce repetition by providing a single comprehensive response to identical, similar, or related comments that share a common theme or concern. Expressed concerns may correspond to a defined SEPA element of the environment (e.g., Earth) or to a procedural concern (e.g., review process).

Final EIS Appendix A (Comments on the Draft EIS) contains a series of tables (Exhibits A-1 through A-4) that allow a reader to navigate to the subsection of Final EIS Chapter 3 containing a response to each comment. The table lists each comment letter received; the number, and the general topic/issue of each comment within that letter (e.g., 1-1, which corresponds to Letter No. 1, comment No. 1); and a 2- or 3-digit numerical identifier for the response category (e.g., 3.5.1) that responds to that particular comment. As shown in the summary of contents below, responses are generally organized by SEPA element of the environment (e.g., Earth), and by groups of response comments. Within each element of the environment, comments are briefly summarized in Final EIS Chapter 3, followed by a response; responses may be further divided into subcategories (e.g., geologic hazards). If a response contains supplemental or updated technical information, or corrects an error in the Draft EIS, this is identified in context.

Note that the Final EIS provides responses to substantive comments on the Draft EIS; comments that are statements of opinion or expressions of support or opposition to the Proposal, and comments that are not related to the EIS are acknowledged without further discussion.

Appendix A of the Final EIS also explains the organization of comments and responses and describes how to locate a response to an individual comment, which is summarized here.

Comment letters/emails were initially organized by date received, and by the type of entity providing the comments, in the following order:

- Government agencies/tribal governments
- Organizations
- Individuals

Each comment letter/email received was given an identifying number, and each individual comment within that letter was numbered sequentially (e.g., 1-1). Similarly, using a verbatim transcript of the meeting, each speaker at the virtual public meeting and each individual comment by that speaker was assigned an identifying number (e.g., T1-1). Appendix A of the Final EIS contains summary tables that enable a reader to find their letter, an individual comment, and the issue category/sub-category numbers in Final EIS Chapter 3 (this chapter) that provide a response.

The issue areas and sub-categories established to organize similar comments are listed below. The first listed issue area (Procedural Issues & SEPA/EIS Comments) contains comments on topics such as the EIS comment period, meetings, and SEPA requirements for an EIS. This category received the greatest number of individual comments. Subsequent issue areas listed below appear in the same sequence as the section appears in the Draft EIS, without regard to how many comments were received. Note that responses to comments touching on Population, Housing, & Employment are incorporated into other response areas (e.g., Plans & Policies).

ISSUE AREAS FOR RESPONSES TO COMMENTS IN THE FINAL EIS

3.1 Comments on Procedures, SEPA, & EIS

3.1.1 Draft EIS Meetings, Hearing, and Comment Period

3.1.2 State Environmental Policy Act (SEPA) & EIS Issues

3.1.3 Statements of Support/Opposition, Opinion, & Non-EIS Comments

3.2 Earth

3.2.1 Groundwater Recharge, CARA Impacts, and Stormwater Infiltration

3.2.2 Reduction in Recharge to Surface Water (Tokul Creek)

3.2.3 Potential Reduction in Recharge to Wetlands

3.2.4 Channel Migration Zone (CMZ) Impacts

3.2.5 Liquefaction Hazard Impacts

3.2.6 Sediment Aggradation & Storm Events

3.2.7 Soil Characterization Data

3.2.8 Landslide & Steep Slope Areas

3.2.9 Future Geotechnical Review

3.3 Air Quality/GHG

3.4 Water Resources – Flooding & Stormwater

3.4.1 Floodplain Analysis and Compensatory Storage

3.4.2 Temperature Impacts to the Snoqualmie River

3.4.3 Direct Discharge and Wetland Hydrology

3.4.4 Water Quality Treatment of Stormwater Runoff

3.4.5 Winery Wastewater Treatment

3.5 Plants & Animals, Wetlands, and Streams

3.5.1 Impacts to the Snoqualmie River

3.5.2 Wetland Buffers, Hydrologic Analysis, and Jurisdictional Determination

3.5.3 Wildlife Habitat

3.5.4 Fisheries

3.6 Environmental Health – Site Contamination & Cleanup

3.6.1 Cleanup Process

3.6.2 Current Conditions at Planning Area 1

3.6.3 Proximity of City of Snoqualmie's North Wellfield

3.6.4 Characterization and Cleanup of Planning Areas 1, 2, and 3

3.6.5 Safety Measures

3.6.6 Filling and Grading and Potential Contaminated Soil Volumes

3.6.7 Borst Lake

3.7 Land Use

3.8 Consistency with Plans, Policies, Regulations, & Agreements

3.8.1 Consistency with Snoqualmie Comprehensive Plan

3.8.2 Consistency with GMA and CPPs

3.8.3 Consistency with King County/City of Snoqualmie Interlocal Agreement Re: Annexation

3.8.4 Development Regulations

3.8.5 Proposal/Proposed Uses

3.9 Aesthetics/Light & Glare

3.10 Historic & Cultural Resources

3.10.1 Potential Historic District

3.10.2 Fieldwork/Methodology, Generally

3.10.3 Japanese Community Site (45-KI-1474) in Planning Area 1

3.10.4 Cultural Properties

3.10.5 General Comments on Historic and Cultural Resources

3.11 Transportation
3.11.1 Traffic Counts
3.11.2 Trip Generation
3.11.3 Trip Distribution
3.11.4 Traffic Forecasting & Modeling
3.11.5 Pedestrian/Bicycle Impacts
3.11.6 Safety Impacts
3.11.7 Additional Traffic on Bridges
3.11.8 Construction Impacts
3.11.9 Impacts to Regional Transportation System
3.11.10 Transit Service
3.11.11 Road Conditions
3.11.12 Timing and Funding of Improvements
3.11.13 Traffic Impacts Generally
3.11.14 Comments Referencing or Incorporating Other Comment Letters
3.11.15 Improvements to SR 202
3.11.16 Weekend & Event Traffic
3.11.17 Traffic Impacts to Snoqualmie Falls & the Salish Lodge
3.11.18 Transportation Comments Not Related to the EIS of the Proposal
3.12 Noise
3.13 Public Services
3.13.1 Police, Fire, and Schools
3.13.2 Parks/Snoqualmie Valley Trail
3.14 Utilities
3.15 Fiscal & Economic Impacts
3.15.1 Need/Viability of Retail
3.15.2 Competition/Effect on Downtown Businesses
3.15.3 No Economic Benefit to the City
3.15.4 Costs of Growth
3.15.5 Worst-Case Analysis
3.15.6 Indirect Impacts
3.16 Comments that Reference, Reiterate, or Incorporate Other Comment Letters and/or Attachments

3.1. COMMENTS ON PROCEDURES, SEPA, & EIS

3.1.1. Draft EIS Meetings, Hearing, and Comment Period

(1) Requests for In-Person Public Hearing

Numerous comments (approximately 36) asserted that the City's "virtual" Draft EIS meeting, conducted via the Zoom meeting application, was not sufficient or was inappropriate, either because of the size/significance of the Proposal; because they wanted to attend an in-person meeting with their neighbors; because of technical problems experienced by some attendees, or other aspects of the meeting they objected to (i.e., login problems, time of day, time limits on speakers); and/or because the commenters interpret the State SEPA Rules – specifically Washington Administrative Code (WAC) 197-11-535 – to require that a public hearing on an environmental document be held if a sufficient number of local residents request such a hearing. The most frequent comment in this category requested an in-person public meeting, although some did not mention the WAC as the basis for the request.

Related comments suggested that meetings, processes, and decisions of this nature should be paused and should not occur during the COVID-19 pandemic. Several of these comments requested that the Draft EIS be withdrawn or retracted until public meetings are allowed after the pandemic, and then reissued. Reasons for retraction/withdrawal stated in the comments include that interested citizens were prevented from meeting and collaborating on responses or testimony, or that Draft EIS meetings are prohibited during the pandemic by Executive Order of the Governor, and/or are contrary to legal opinions issued by the State Attorney General.

Several comments requested extensions of the comment period, due to the size and complexity of the Draft EIS, and/or personal difficulties associated with the COVID-19 pandemic.

Response:

a. SEPA Requirements for Public Hearings

As context for this response, it should be noted that state law permits only a single "open record" public hearing (i.e., providing for the receipt of information and testimony) as part of review of a project (Revised Code of Washington [RCW] 36.70B.050 (2)). Multiple open record hearings to receive testimony that is part of the record is not permitted. The Snoqualmie Mill PCI Plan Proposal will be reviewed pursuant to the City of Snoqualmie's adopted review process for Category III applications, which requires an open record pre-decision hearing by the Planning Commission or Hearing Examiner (City of Snoqualmie Municipal Code [SMC] 14.30.020).

SEPA's provisions for public hearings and meetings, referenced by section number in numerous comments, are contained in WAC 197-11-535, and read as follows:

(1) *If a public hearing on the proposal is held under some other requirement of law*, such hearing shall be open to consideration of the environmental impact of the proposal, together with any environmental document that is available.

(2) *In all other cases* a public hearing on the environmental impact shall be held whenever one of the following situations occurs:

(a) The lead agency determines in its sole discretion, that a public hearing would assist it in meeting its responsibility to implement the purposes and policies of SEPA and these rules; or

(b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS… (*emphasis added*)

As stated in the rule, the public hearing requirement applies only in situations where an open record hearing is not held under some other provision of law. As noted previously, the City's adopted review process for PCI Plan project permits requires an open record public hearing; holding an open record public hearing for the Draft EIS would, therefore, result in two open record hearings for the project, which would violate state law. In addition, although not determinative in this situation, the City did not receive 50 requests for a public hearing on the Draft EIS. It should be noted that the City's SEPA Responsible Official communicated this information to several commenters during the comment period, in response to phone calls and emails.

The SEPA Rules do not require that a lead agency hold a public meeting to receive comment on a Draft EIS (see WAC 197-11-502 (6), SMC 19.04.180)). Although the City could have accepted written comments only, it chose to provide a forum adapted to the circumstances; this included an opportunity for interested persons to express their concerns in a virtual setting, where speakers could be viewed and heard by other meeting attendees. A verbatim transcript of the meeting was recorded, is included in the Final EIS, and is part of the public record for the Proposal. In addition, the comment period for the Draft EIS was extended for a total period of 75 days to provide an expanded comment opportunity. These efforts resulted in a comprehensive record of substantive comments and statements of opinion concerning the Proposal.

b. Governor Inslee's Proclamations on Public Meetings

Governor Inslee has issued a number of official proclamations in response to the COVID-19. On February 29, 2020, the Governor proclaimed a state of emergency (*Proclamation 20-05*); this was followed on March 23 with *Proclamation 20-25 "Stay Home-Stay Healthy,"* which ordered all residents, except for those providing essential services, to stay home. Among other things, 20-25 prohibited gatherings of any kind, whether public or private, civic or community, or religious in nature. Although 20-25 expired on April 1, it was followed by a series of extensions (20-25.1 through 20-25-6) – all of which included the prohibition on meetings.

Proclamation 20-28 was issued on July 31, 2020, and prohibited any meeting required by the Open Public Meetings Act (RCW 42.30, OPMA) *"unless (a) the meeting is not conducted in-person and instead provides an option for the public to attend the proceedings through, at a minimum, telephonic access and may include other electronic, internet or other means of*

remote access, and (b) provides the ability for all persons attending the meeting to hear each other at the same time." The prohibition continues in effect as of this writing (Proclamation 20-28.9, issued on September 2). The proclamation does not prohibit government agencies from "taking action," as was stated on one comment; this issue is discussed further below.

The City's decision to hold a virtual/computer-based public meeting on the Snoqualmie Mill PCI Plan Draft EIS provided a reasonable opportunity for interested resident to participate in a public meeting via computer of telephone; to be seen and heard, and to see and hear each other; and thereby to provide comment that would become part of the public record. The meeting was in addition to the opportunity to provide comments by mail or email during the 75-day comment period.

The City's approach was consistent with the prohibitions in numerous Proclamations issued by the Governor and which are still in effect as of this writing. The pandemic has imposed burdens on all City residents, officials, and employees, but the City has continued to provide services and to process applications for licenses and permits. No violations of regulatory requirements or limitations on the ability to comment occurred as a result of the Draft EIS virtual public meeting, and the City does not find a basis for requiring withdrawal or retraction of the Draft EIS.

c. Attorney General Opinion on Public Meetings

A March 26, 2020 Attorney General (AG) "opinion" cited in several comments is titled "Updated Open Public Meetings Act General Guidance from the Office of the Attorney General Regarding the Coronavirus Disease (COVID-19) Event." This guidance document expired on April 23, but was extended to June 17 by the Fifth Updated general guidance document (dated June 1, 2020). It references Governor's Proclamation 20-28 concerning the OPMA, which, as summarized above, prohibits in-person public meetings.

The Draft EIS comments citing the AG's "opinion" for the proposition that public meetings are prohibited appears to conflate the AG guidance with the Governor's proclamations discussed above. As stated in the title and in the body of the AG document, it provides *general guidance* only, and is not legal advice or a legal opinion; the document directs local agencies to consult with their counsel for legal advice. The guidance in the document is focused on decision-making processes (i.e., what types of matters and what agency decisions can or should be made when a public meeting subject to OPMA cannot be held in view of Proclamation 20-28).

In essence, the AG guidance identifies a number of questions that a local agency "governing body" should consider when deciding whether or not to hold a public meeting to "take action" on a matter. A number of key statutory definitions must be applied to interpret the applicability of the OPMA, and thus the AG's general guidance. These include the following: a "governing body" is generally a multi-member council, board, or commission or policy or rule-making body; "action" is defined as the official business by a governing body; "final action" means a collective vote by the governing body by motion, resolution, or ordinance; and a "meeting" is a meeting at which action is taken (RCW 42.30.020).

Applying these terms to the Snoqualmie Mill PCI Plan public meeting, the Draft EIS meeting

does not fall within the ambit of an OPMA meeting. The meeting was sponsored by the City's Planning Director/SEPA Responsible Official, not by the City's governing body/City Council. No action or final action was or could be taken; the meeting was convened solely to take public comment on a SEPA document that would be considered and responded to in a Final EIS on the Snoqualmie Mill PCI Plan Proposal. An EIS is an informational document and does not constitute or require a decision by the governing body, and is not, therefore, an action or a final action subject to OPMA or addressed by the AG updated guidance.

(2) Virtual Meeting Problems

Comments expressed a variety of problems or concerns with the virtual meeting. These included technical glitches, such as gaining entry via computer, as well as comments about the time of day the meeting was held and limits on speaking time.

Response:

Most of the comments regarding problems experienced with the Draft EIS virtual meeting came from a single commenter, but the City appreciates that other residents may have experienced technical difficulties, frustration. or inconvenience using the Zoom meeting application. The Zoom application has been used by many businesses, institutions, and government agencies during the COVID-19 pandemic, in Washington and throughout the U.S., as a tool to continue to function under difficult conditions. Like any technological tool, it can experience occasional glitches. Overall, however, the City received very few complaints regarding technical problems with the meeting participation.

The time period selected for the meeting was also identified as an issue in a few comments. Draft EIS meetings are most commonly held in the evening, to allow people to attend after work hours. The City decided to have the Snoqualmie Mill meeting bridge the afternoon and evening hours; this was intended to provide additional flexibility to participants.

Finally, a comment objected to the limit on speaking time: 3 minutes for individuals and 5 minutes for organizations. Limits on speaking time are commonly imposed for meetings in most cities, including most other meetings in the City of Snoqualmie. The purpose of the time limits is to help make meetings efficient and to provide opportunities for all speakers to be heard. Moreover, the City's process provided multiple opportunities for submitting comments; verbal comments could be, and in fact were, supplemented by emails and expansive letters from agencies, tribes, Snoqualmie residents, and other interested parties. Verbal comments are afforded no more or less importance or weight than written comments, so the time limit on speaking did not impose any limit on the amount or frequency of written comments that could be submitted. Several commenters, in, fact, submitted multiple letters/emails.

(3) Requests for Extension of the Draft EIS Comment Period

Numerous comments requested an extension of the Draft EIS comment period because of the pandemic or the length and complexity of the Draft EIS document. Comments expressed problems with the notice of EIS issuance.

Response:

The SEPA Rules establish a 30-day comment period for a Draft EIS; the lead agency may extend the comment period for another 15 days upon request (WAC 197-11-455(6)-(7)). The Snoqualmie Municipal Code incorporates these provisions by reference. The Snoqualmie Mill PCI Plan Draft EIS was published on April 27, 2020, and the City opted to extend the comment period to the maximum 45 days permitted by the rules – to June 11, 2020 – without requiring a request to extend, at the outset. During the 45-day comment period, requests for additional extension of the comment period were received from tribes, organizations, and individuals; reasons provided include the size and complexity of the Draft EIS document and the continuing pandemic. In response, and with the consent of the applicant, on June 5 the City provided notice that the comment period would be extended an additional 30 days, ending on July 10, 2020. These extensions cumulatively resulted in a comment period of 75 days total. Requests for additional or longer extensions were also received but were not granted. All notices required by SEPA were published consistent with applicable rules.

(4) Requests for Retraction/Reissuance of the Draft EIS

Several comments requested that the City retract or issue the Draft EIS, either because of the pandemic or because of perceived flaws in the document.

Response:

The City does not find any basis for retracting and reissuing the Draft EIS due to the procedural issues discussed in this category of comments.

3.1.2. State Environmental Policy Act (SEPA) & EIS Issues

(1) Alternatives

Comments stated that the Draft EIS Redevelopment Alternative is too similar to the Proposal, does not provide a meaningful comparison with the Proposal, and that the Draft EIS does not provide an adequate range of alternatives. The comments also asserted that the impacts of the alternative are the same or greater than those from the Proposal. One comment stated that there are no alternatives in the EIS. A comment suggested including an additional alternative that relocated Mill Pond Road farther from the river. Another comment questioned whether the applicant could change the Proposal to the Redevelopment Alternative.

Response:

According to the SEPA Rules, "reasonable alternatives" include actions that could feasibly attain or approximate a proposal's objectives at a lower environmental cost or decreased level of degradation (WAC 197-11-440(5(b), 197-11-786)). The word "reasonable" is "intended to limit the number and range of alternatives, as well as the amount of detailed analysis of each alternative" (WAC 197-11-440(5)(b)(i)). The primary question under SEPA is whether the alternative provides a useful basis of comparison for the decision maker. This is precisely what

the Redevelopment Alternative provides.

Land uses are an important variable in any plan, and the Redevelopment Alternative is intended to demonstrate the effect on the environment of modifying the types and relative amounts of land uses. The Redevelopment Alternative would focus planned land uses to a greater degree than the Proposal on warehouse and manufacturing uses, and would reduce residential, retail, and particularly office uses (reduced by 75%). These land use changes would reduce total daily trips by 35% and peak hour vehicle trips by 25% at buildout. The reduction in population and jobs implicit in the land use change would also reduce impacts on parks (reduced demand for facilities and services), numerous public services (e.g., fewer police and fire service calls, fewer school students), and utilities (reduced water consumption and sewer and water service).

The comment that the Redevelopment Alternative is "too similar" and the range of alternatives too narrow, reflects the commenter's opinion but is not accurate. Similarly, although the comment states that the alternative would result in increased impacts, this is incorrect: impacts would be the same in some cases but less than the Proposal for numerous elements of the environment.

Regarding the range of alternatives, the SEPA Rules state that a reasonable alternative is one that can attain or approximate a proposal's objectives at lower environmental cost or a reduced level of degradation (WAC 197-11-440 (5)). There is no minimum or required number of alternatives in an EIS. In addition, there is no prescribed reduction in the size of a proposal or decrease in the extent or degree of impacts between the proposal and the alternative that defines a "reasonable" alternative. Moreover, according to relevant court decisions, all impacts do not need to be lower than those of the proposal for an alternative to meet the reduced impact requirement of the SEPA Rules; impacts may be lower in some areas and greater in others.

A number of other variables that, in theory, could be modified to create an EIS alternative were also considered, but were eliminated from detailed analysis because the resulting alternative would not accomplish the objectives of the Proposal and, therefore, would not be reasonable. For example, site coverage by the Proposal's buildings, roads, and other impervious surfaces is very low for an industrial site (37%), and 63% of the overall site area would be preserved in open space. Reducing development intensity and site coverage further, to avoid wetlands for example, would not be reasonable. The site is located almost entirely in the floodplain, so it is not possible to reduce flooding by developing outside the floodplain. Because Planning Area 1 is not affected by contamination, and legacy contamination will be remediated in phase with development across the site, avoiding contaminated areas might be possible but would not result in an environmental benefit. Additional discussion of reasonable alternatives has been added to Chapter 2 of the Final EIS (see Section 2.4). This includes consideration of alternatives that would relocate Mill Pond Road and/or modify proposed land uses.

The Draft EIS contains a No Action Alternative, which is required by SEPA, and a Redevelopment Alternative, which varies PCI Plan land uses in a manner that reduces numerous environmental impacts. These alternatives are described in Chapter 2 of the Draft EIS and are evaluated in every section of Chapter 3 of the Draft EIS. It is possible, however, that the comment implies

that the alternative is too similar to the Proposal because building footprints for Planning Area 1 are the same between the alternatives. EIS alternatives are intended to provide decision makers with a basis for comparing the impacts of different courses of action. Under SEPA, an alternative must meet or approximate the proponent's objectives, while showing a lower level of impacts. However, it is not necessary that every impact of an alternative be lower than those of the Proposal. The Redevelopment Alternative does reflect substantial differences in impacts to several elements of the environment. Note that the Final EIS, Section 2.4, contains an expanded discussion of other alternatives that were considered but not carried forward for detailed analysis.

With respect to the commenter's question whether the applicant can change the Proposal to the Redevelopment Alternative, it is theoretically possible that the applicant could change the Proposal, but this is considered unlikely. If the concern raised by the comment is about the potential for the outdoor performance center to be included in the Proposal, the applicant has stated publicly it has no interest or intention to pursue a concert venue on the Snoqualmie Mill site. Although an outdoor performance venue was part of an initial site plan, it was subsequently eliminated; it is included in the Redevelopment Alternative for purposes of analysis only.

(2) Phased Environmental Review

Several comments asserted that the Draft EIS approach to phased review is incorrect and was relied on to defer information and analysis that should be provided now. The SEPA Rules and court decisions were cited in these comments to emphasize the importance of conducting early review. The SEPA Rules were also cited regarding the appropriate sequence of phased review —-from general documents for projects at an early stage, to more detailed project-specific documents. Comments also suggested that "piecemealing" has occurred (i.e., the inappropriate division of projects or interdependent parts of projects into pieces to avoid environmental review). Related comments stated that the information provided for Phases 2 and 3 was insufficient or too general.

Response:

SEPA requires that environmental review be conducted when it is sufficiently definite so that the major features of a proposal can be accurately described and impacts can be accurately identified. The Draft EIS is appropriately following the sequence for phased review prescribed in WAC 197-11-060(5)(c)(ii); this is not piecemealing. The Draft EIS embodies the first phase of more detailed, site-specific analysis of the overall PCI Plan. The Draft EIS explains, in Section 2.2 on page 2-11, that differing levels of information, planning, and analysis apply to the Proposal's various phases/planning areas. More information and more detailed/project-specific analysis is provided for Planning Area/Phase 1, since that element of the overall site plan is more definite. Less site planning has occurred, less detailed information is available, and therefore more programmatic-level analysis is provided for Planning Areas 2 and 3. The Draft EIS clearly states that there will be supplemental, more detailed environmental review for these phases when planning has progressed sufficiently. The information and analyses provided for Planning Areas

2 and 3 is considered early review for those phases of the project, consistent with the SEPA provision cited in the comment.

Nothing in SEPA prohibits combining site-specific and programmatic analysis in the same document. In SEPA practice, this type of approach is often used for master planned projects that will be developed over a long planning horizon, and courts have concluded that the standard for preparing a non-project, or programmatic, EIS is appropriate for a proposal that is a "hybrid" proposal that combines project-specific and non-project elements. In addition, providing some level of analysis for the entire site in this manner also enables the Draft EIS to evaluate cumulative impacts. Far from dividing the project into pieces to avoid analysis, which is the definition of piecemealing, the Draft EIS is addressing cumulative impacts of the overall project by providing current analysis of portions of the site that have not been planned in detail at a programmatic level. When subsequent SEPA analysis occurs for Planning Areas 2 and 3, the sequence of environmental documents would be from programmatic analysis at an early, conceptual stage (this EIS), to more detailed, site-specific analysis in a subsequent environmental document.

The City's review process for the Snoqualmie Mill site, as reflected in Comprehensive Plan policies and code requirements, involves a sequence of plans and approvals that must occur before a property owner can move onto the next step and ultimately to submitting an application. Programmatic environmental review also occurred for City actions leading up to the PCI Plan, including the Pre-Annexation Agreement, updates of the Comprehensive Plan to address the site, and the Post Annexation Implementation Plan. Refer to Final EIS Section 3.8.3, and Chapter 2 of the EIS (Draft and Final EIS documents), for a discussion of prior planning steps.

(3) EIS Preparation

Several comments stated that the elapsed time for preparation of the Draft EIS violated the Snoqualmie Municipal Code's 180-day time limit.

Response:

The SEPA Rules do not specify a time period or limit for preparation of a Draft EIS. The City's SEPA ordinance, however, does establish a 180-day time limit *unless* the City and the project proponent agree in writing to a longer period for preparation (SMC 19.04.080). The Snoqualmie Mill PCI Plan proponent did agree in writing to a longer, unspecified time for preparation of the Draft EIS; the agreement is on file with the City. It is noted that the SEPA statute was amended in 2017 to establish an aspirational goal of completing EISs within 2 years (RCW 43.21C.0311). The timing goal is motivated by economic competitiveness and is intended to protect applicants from undue delay, uncertainty, and costs, and to balance expeditious preparation with analytic integrity of EIS documents (Laws of 2017, chapter 289 Section 1).

It is acknowledged that the Draft EIS took several years to prepare. (A list of EIS authors and principal contributors is included in the Fact Sheet.) Extended preparation time is common for the preparation of environmental documents for large master planned projects, in Snoqualmie

and many other jurisdictions. Initial site plans and preliminary engineering designs were also refined while the EIS was being prepared, in tandem with and in response to the ongoing environmental analysis. In addition, the City's process for preparing and reviewing the Draft EIS was very thorough and involved peer review by a team of technical experts of preliminary draft reports and sections. The final stages of preliminary review also occurred during the onset of the COVID-19 pandemic and closure of City Hall, which caused further delays in preparing, editing, and publishing the Draft EIS.

(4) EIS Detail/Generality and Sufficiency

A number of comments stated generally that more detail and analysis are needed because the impacts are significant, and some suggested that the Draft EIS should be withdrawn/retracted and reissued or revised. Additional comments addressed the level of analysis in the EIS and the supporting technical studies, stating that the analysis is too general, does not contain enough detail, or is too general or insufficient for the project as a whole or specifically for Planning Areas 2 and 3. Comments also stated that detail for individual elements of the environment, such as schools, is not sufficient, or that mitigation measures are not discussed appropriately or in sufficient detail. Comments stated that indirect and cumulative impacts were not evaluated.

Some comments identified an aspect of the Proposal to indicate an unspecified impact. For example, an individual comment referenced the size of the development and characteristics of the site to indicate change that will occur with development but did not clearly or specifically identify the change that is asserted to occur.

Other comments stated that a number of historic buildings and remnants would be destroyed by development, and that impacts will be significant. Some comments quoted general language in the SEPA Rules – for example, the EIS "shall be supported by the necessary environmental analysis" (WAC 197-11-400(3) – as support for the asserted lack of detail. A comment stated that the EIS did not consider "all relevant environmental reviews" conducted on the site by other agencies and on other properties that will be impacted.

A comment noted errors in the Draft EIS Cover Memo related to the amount of open space and the number of jobs in the Proposal.

Response:

The City believes that the Draft EIS provides sufficient detail and meets applicable SEPA requirements for substance and procedures, including consideration of direct, indirect, and cumulative impacts. Moreover, any omissions or corrections, and any relevant supplemental substantive information, are provided in the Final EIS.

In general, many comments that asserted insufficient detail actually restate impacts that are identified and evaluated in the Draft EIS in sufficient detail to identify impacts and mitigation measures. The comment regarding historic resources is an example; the Draft EIS (Appendix E) contains detailed information about on-site resources and potential impacts. These comments stated the writers' opinions that the analysis is not sufficient or contains too many "variables," but did not identify where or what type of detail is lacking in the EIS. These comments are not

sufficiently specific about asserted deficiencies to permit a more detailed response.

The comment regarding the insufficiency of mitigation measures is interpreted to primarily address how the EIS document is organized. The comment did not assert that the mitigation measures in the Draft EIS are not themselves adequate to address impacts, but rather that the purpose or benefits of proposed measures are not described sufficiently. If the comment is suggesting that the environmental benefit of each mitigation measure must be explicitly stated in the mitigation subsection of each section of the Draft EIS (e.g., Section 3.1, Earth Resources), that is not consistent with standard EIS practice and is not required by the SEPA Rules. The SEPA Rules provide the lead agency with the flexibility to organize the overall EIS section on Affected Environment, Significant Impacts, and Mitigation measures in any manner it finds useful to decision makers (WAC 197-11-440(6)(b)(ii)). The approach used in this and many other EISs is to identify the rationale for various mitigation approaches in the discussion of significant impacts; it is not necessary or usual to repeat the purpose or benefit of different categories of measures in the mitigation subsection within each EIS section. The City believes that the reader will understand that the purpose and benefit of an erosion control plan, for example, is to control erosion, without needing to state that explicitly.

Regarding the lack of detail for Planning Areas 2 and 3 noted in some comments, the Draft EIS acknowledges that plans for these subsequent phases are still being refined and that the analysis is programmatic. The Draft EIS states numerous times (see, for example, page 2-11) that the City is following a course of phased environmental review and that additional environmental review will be conducted for subsequent phases of development. Please refer to the discussion of phased environmental review in Section 3.1.2(2) above.

The comment regarding other agency environmental reviews of the site and surrounding properties is noted, but the comment is overly broad and indefinite and does not provide sufficient information to permit a substantive response.

The Cover Memo does contain a typographical error regarding the fractional amount of the PCI Plan retained as open space; the correct amount is approximately two-thirds, not three-fourths. This correction is reflected in the Final EIS Cover Memo.

(5) Scope of EIS & Analysis

A comment noted that the EIS does not evaluate electric power or consider energy options. A comment stated that the EIS does not evaluate impacts to hospital services. A comment stated that impacts outside the City are not addressed.

Response:

The scope of an EIS (i.e., which elements of the environment/environmental issues and alternatives are addressed in the document) is determined by the scoping process, which includes opportunities for public comment; refer to WAC 197-11-408. Scoping for the Snoqualmie Mill PCI Plan Proposal occurred from May 3 to May 24, 2017 and included a public meeting at Snoqualmie City Hall. Comments received during the EIS scoping process are summarized in a Scoping Summary Memorandum (City of Snoqualmie, December 18, 2017)

from Mark Hofman, City of Snoqualmie Community Development Director, which was posted on the City's website. It is acknowledged that energy/electric power and hospital services were not identified as elements of the environment in scoping comments or by the City and, therefore, were not evaluated in the EIS. Note, however, that the applicant has committed to establish a goal of LEED (i.e., Leadership in Energy and Environmental Design) Gold or Platinum certification to achieve energy efficiency in buildings; refer to Draft EIS page 2-31. This goal would be included in design guidelines applicable to PCI Plan buildings and, along with the Energy Code (SMC 15.24), would conserve electricity.

It is acknowledged that the focus of the EIS impact analysis is on potential impacts occurring on and around the site and in the City of Snoqualmie. This focus is believed to be appropriate given the nature of the Proposal and its location within the City. However, potential environmental impacts occurring outside the City are addressed in numerous sections of the Draft EIS, including Air Quality and GHG; Water Resources; Land and Shoreline Use; Consistency with Plans and Policies; Aesthetics, Light, and Glare; and Noise.

(6) Mitigation

Several comments considered the language used to describe EIS mitigation measures to be too indefinite and not sufficiently regulatory; for example, some measures were framed using the word "may" rather than "should," "should" instead of "must," or "could" rather than "should." Related comments noted an absence of a commitment to pay/mitigate or stated that the City should receive assurances for mitigation. Comments also addressed the timing of mitigation, primarily for infrastructure improvements, stating that mitigation should be required before or concurrent with development. Note that additional comments addressing Transportation (Section 3.11 of this Final EIS), Public Services (Section 3.13), and Fiscal & Economics (Section 3.15) also questioned the responsibility and timing of mitigation. A comment stated generally that mitigation is not detailed enough.

Response:

The EIS includes several different categories of mitigation measures: those that the applicant has included in the Proposal itself, those required by adopted regulations, and those additional measures that are recommended by the EIS consultants based on their review of the Proposal and identified significant impacts. The language used in the EIS is typical for measures that are recommended in environmental documents; it recognizes that the City Council, not the EIS, will determine which mitigation measures "shall" be required as conditions of approval, and what assurances the City will require to ensure that conditions and mitigation measures are implemented.

The comment stating that mitigation is not detailed enough to permit a detailed response and is acknowledged. The City believes that mitigation measures are stated in sufficient detail for a proposed master plan that is being evaluated in a context of initial land use approval.

3.1.3. Statements of Support/Opposition, Opinion, & Non-EIS Comments

(1) Support or Opposition to the Proposal or Alternative

A number of comments expressed support or opposition to the Proposal, or to elements of the Proposal, for various reasons. Most comments based their opposition to the Proposal on the perceived occurrence of general but unspecified impacts, on identified impacts to various elements of the environment (e.g., flooding, wildlife, traffic, noise, contamination, impacts to downtown businesses), a perceived absence of any benefit to the City, or for no stated reason. Some comments stated they were opposed to the Proposal without providing any reason, including some that stated their opposition to any development on the site or in the City generally. Some comments expressed a preference for a different use, or for no use or development, of the site. A few comments also expressed opposition to the Proposal but supported the continuation of DirtFish operations. A few comments expressed support for the No Action Alternative, which is interpreted to equate to opposition to the Proposal.

Relatedly, a number of comments expressed support for the Proposal, but not for the outdoor performance space/amphitheater. In addition, several comments stated that they were opposed to the outdoor performance space, typically because of noise or traffic impacts. A few comments expressed uncertainty whether or not the outdoor performance space was included in the Proposal. In addition, comments expressed general opposition to the outdoor performance element based on general concerns about noise and/or traffic. A letter transmitted a survey conducted by the Downtown Snoqualmie Merchant's Association expressing opinions for and against the Proposal.

Response:

Statements of opinion, whether in support or opposition to the Proposal or an alternative, do not provide sufficient specific or substantive information on which to base a detailed response. Instead, the comments are acknowledged.

In response to confusion as to whether the 3-acre outdoor performance space is or is not proposed, the outdoor performance space is included in the Draft EIS Redevelopment Alternative, but it is not an element of the proposed PCI Plan. The preliminary site plan for the Snoqualmie Mill PCI Plan Proposal, which was the basis for the initial application and was discussed at the EIS scoping meeting in May 2017, did include the outdoor performance space, as well as some errors on the site plan graphic. As noted in the Draft EIS project description (Chapter 2, Proposal and Alternatives), this and several other features of the initial Proposal were revised as the site plan was evaluated and refined; the outdoor performance space was eliminated from the proposed PCI Plan but retained in the Redevelopment Alternative for purposes of analysis only. To emphasize, the PCI Plan does not propose or include an outdoor performance space.

The statements of opposition to the outdoor performance element of the Redevelopment Alternative based on identified impacts are acknowledged. Section 3.11 (Transportation) and Section 3.12 (Noise) of the Draft EIS disclose adverse impacts associated with outdoor

performances.

(2) General Statements of "Concern"

Some comments expressed concern about the Proposal with a general mention of an element of the environment, including habitat loss, flooding, contamination, and traffic.

Response:

The expressed concerns are acknowledged; it is not possible to provide a more specific response to a general statement of concern. The commenters are referred to the responses to comments on the environmental issues mentioned for specific information.

(3) Unsupported Statements of Opinion on Various Topics

This category of comments expressed an opinion, recommendation, disagreement, or contrary conclusion about portions of the Draft EIS analysis but did not provide a supporting reason or rationale. Some comments, for example, stated that the City should adopt or modify a specific policy, such as requiring "net zero" impact or stronger sustainability policies. Other comments disagreed that the Proposal would increase tourism, or that redevelopment would provide any benefit. Comments also expressed the writers' opinion or conclusion, for example, that visitors to the project would not also visit downtown Snoqualmie, that the winemaking process is wasteful, or that development next to the river is too risky. Another group of comments expressed disagreement with Draft EIS discussions of City crime statistics, affordable housing, and with the Draft EIS cover memo. Finally, a few comments expressed negative opinions about actions of City officials unrelated to the EIS or with management of the City in general.

Response:

General statements of opinion or disagreement with aspects of the Draft EIS analysis are acknowledged; however, a more specific response is not possible without further substantive information that identifies a more specific substantive issue with the EIS. Comments about issues unrelated to the EIS, such as preferences for policies or programs that the City has not adopted, are similarly acknowledged without further response. Those comments that suggested a particular approach as mitigation for a specific impact are addressed under the relevant impact topic.

(4) Miscellaneous Non-EIS Comments

This category includes a diverse mix of comments that express opinions and concerns about issues or procedures that are not specific to the EIS or the Proposal. The range of comments includes the following: comments about management of City government, about deficiencies in the code, opinions on SEPA appeal procedures, statements about past public records requests, speculation about prior City actions relating to the floodway boundary and other non-EIS issues, questions about how the owner would enforce COVID-19 restrictions, comments about deficiencies in the City code and a need for more public participation generally, complaints about various procedures, suggestions about the timing or substance of future City decisions on

the project, a statement that all discretionary options be analyzed, a request that the City Council read the EIS, a statement that non-City residents' opinions should be heard, and a statement that residents in unincorporated areas cannot vote on City issues. A number of comments concerned the applicant, including allegations of prior on-site stormwater violations not related to the Proposal, and speculation about future compliance with requirements.

Response:

These and similar comments raise concerns that are outside the scope of an EIS, are not related to the Proposal, and do not permit a substantive response. They are acknowledged in the Final EIS.

3.2. EARTH

3.2.1. Groundwater Recharge, CARA Impacts, and Stormwater Infiltration

Comments related to this concern focused on two primary issues: (1) recommendations for inclusion of stormwater infiltration to manage stormwater, and (2) assertions of reduced recharge to underlying aquifers due to the construction of impervious surfaces and impacts to Critical Aquifer Recharge Areas (CARA). An assertion suggested that reference to long-term groundwater level monitoring at Snoqualmie Ridge requires additional explanation/justification.

Response:

(1) Infiltration

Fill material was placed across the property at various times in the past to accommodate mill operations. The fill overlies native, predominately fine-grained, floodplain deposits. The fill is not suitable for infiltration of stormwater as defined and described in the *King County Surface Water Design Manual* (KCSWDM; King County, 2016). The fine-grained overbank deposits present beneath the fill soils are also infeasible for stormwater infiltration due to the grain size and resultant hydraulic characteristics of the deposit. The overbank silts/clays do not meet the grain-size distribution requirements for infiltration as defined and described in the KCSWDM (2016).

Fine-grained floodplain deposits and a thick sequence of very low-permeability lacustrine sediments present beneath the Mill site restrict the potential for on-site stormwater infiltration. Permeable channel deposits are present but are limited in thickness and distribution at the Mill site. Figure 6 in Appendix B of the Draft EIS shows Associated Earth Sciences, Inc.'s (AESI's) interpretation of the extent of these depositional environments including the overlying existing fill and the native material present on site. Beneath the artificial fill, most of the Mill site is underlain by low-permeability overbank fine-grained deposits.

AESI completed an analysis of the shallow Snoqualmie River Shallow Aquifer (AESI, 1993) for the Snoqualmie Falls Hydroelectric Project. The purpose was to analyze impacts of changes to the Snoqualmie River stage on Snoqualmie Shallow Aquifer groundwater levels in the adjacent floodplain due to the hydroelectric project. The study included the installation of 12 exploration borings and 8 long-term shallow groundwater monitoring wells around Snoqualmie, two of which (EB-3 and EB-4) were installed on the Mill site. An extensive database of periodic shallow groundwater monitoring level data extended from 1992 to 2003 for most of the wells. The permeability of the fine-grained overbank deposits is very low as documented by slug testing[2] and in the multi-year water level monitoring program. These low-permeability soils drain and

[2] A slug test is a field test conducted to estimate hydrogeologic properties of an underlying aquifer.

recharge slowly and are classified as infeasible for infiltration of stormwater runoff.

(2) Recharge

Recharge potential to the Snoqualmie Shallow Aquifer system is limited by the low permeability of the overbank deposits. Since infiltration is classified as infeasible in accordance with the criteria of the KCSWDM, stormwater management alternatives are limited to surface dispersion/conveyance methods. In general, on-site stormwater management will include 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 intent of the Master Drainage Plan is to maintain discharge to on-site and off-site wetlands and streams consistent with existing conditions; therefore, groundwater recharge post-development is also expected to be similar to existing conditions.

Based on deeper explorations completed on site, the near-surface floodplain and fluvial deposits overlie a thick section of very low-permeability lacustrine silts and clays deposited in post-glacial Lake Snoqualmie. Monitoring well MW-1, completed near the south end of the site, encountered lacustrine sediments between approximately 40 and 200 feet in depth. Deep borings completed for other projects in the vicinity of the site also encountered lacustrine deposits. City of Snoqualmie well no. 2 at the South Well Field (SWF), located approximately 4,000 feet south of the Mill site just south of the Snoqualmie River, encountered recent lacustrine deposits to a depth of about 290 feet overlying pre-Fraser sediments. The lacustrine deposits of these thicknesses form a significant hydraulic barrier to vertical groundwater flow beneath the Mill site. The low permeability lacustrine deposits are present beneath all of Planning Area 1 and extend to the base of slopes to the north and east across the remainder of the site.

Review of the King County CARA map dated March 1, 2012 (Figure 20 in Draft EIS Appendix B) indicates that the area immediately surrounding the Snoqualmie Mill site to the north, and portions of the site on the west and northwest parts of the property, are classified as a Category 1 CARA. The areas mapped as a Category 1 CARA appear to generally correspond to the mapped 10-year time of travel (TOT) wellhead protection areas (WPAs) for groundwater production wells. The area immediately south of the Mill site, including the Mill Pond, and portions of the site on the southeast and southwest parts of the property are classified as a Category 2 CARA. The majority of the Mill site, however, is not classified.

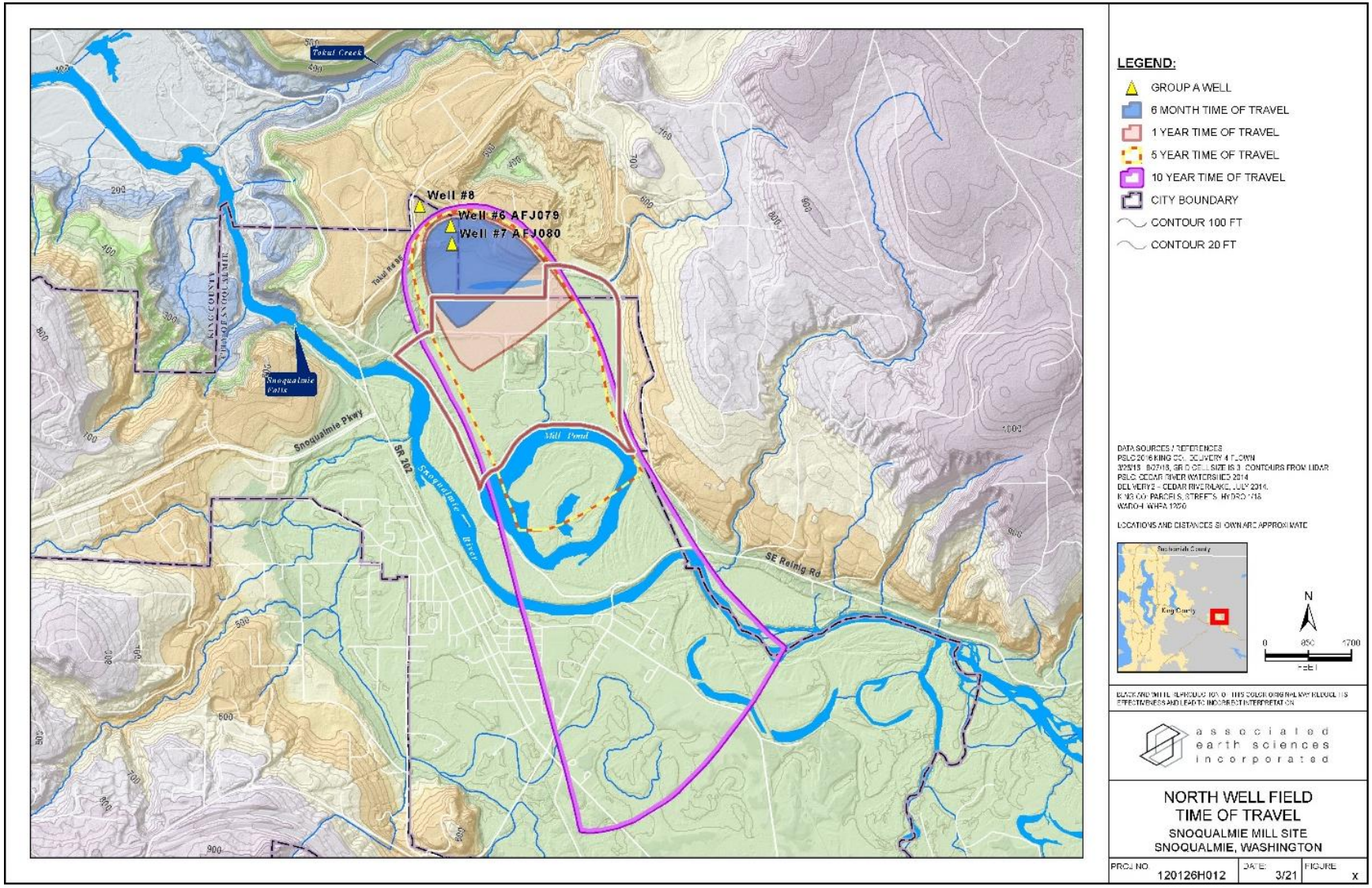
Many of the WPAs shown on the King County CARA map consist of a circular WPA centered around the groundwater source, including the WPA delineated for the North Well Field (NWF) just north of the Mill site. These circular WPAs appear to have been delineated using a calculated fixed radius (CFR) technique. The CFR is a simple two-dimensional analysis, assumes that the initial hydraulic gradient is horizontal (i.e., that there is no ambient groundwater flow), and does not take into account complex hydrogeologic conditions, such as aquifer heterogeneities, varied aquifer geometry, bedrock boundaries, and a sloping hydraulic gradient, all of which are present in the vicinity of the Mill site. As a result, delineated WPAs obtained via the CFR method for the NWF may be misleading.

AESI developed numerical groundwater flow models, using MODFLOW, to evaluate the

groundwater capture zones for both the NWF and SWF (AESI, 1994, 1995, 1996), north and south of the Mill site. The capture zones delineated by the MODFLOW modeling incorporate a conceptual hydrogeologic model developed by AESI through analysis of subsurface conditions observed in explorations completed on and off site, review of conditions reported on Washington State Department of Ecology (Ecology) well logs, water level monitoring, and detailed hydrogeologic mapping. The resulting capture zone calculated by the three-dimensional MODFLOW model takes into account existing conditions and represents a more realistic estimate of the TOT zones to the production wells at the NWF and SWF. A graphic showing the modeled time of travel from the NWF is shown in Exhibit 3.2-1 below.

Recharge to the Deep Aquifer occurs from limited vertical leakage through the overlying aquitards and is primarily from throughflow of groundwater coming down-valley from the southeast. As described in detail in the Draft EIS Section 3.1, in the discussion of the Affected Environment, groundwater flow models indicate that most of the water discharging at the NWF and SWF comes directly from upgradient sources in the Deep Aquifer, originating a few miles up-valley (southeast) of the Mill site. The modeling suggests that recharge from shallower aquifers in the vicinity of the Mill site account for no more than about 10% of the water pumped at the NWF and SWF (AESI, 1995, 2007). Because of the limited recharge from overlying aquifers in the vicinity of the Mill site (as described above) and since no significant reduction in recharge to overlying aquifers is expected, no significant reduction in recharge to the Deep Aquifer is anticipated. Therefore, no probable significant impacts to the Deep Aquifer have been identified from the proposed PCI Plan. A comment stated that recharge should be reexamined but did not provide any reason why a reexamination was necessary.

Exhibit 3.2-1 Time of Travel Zones



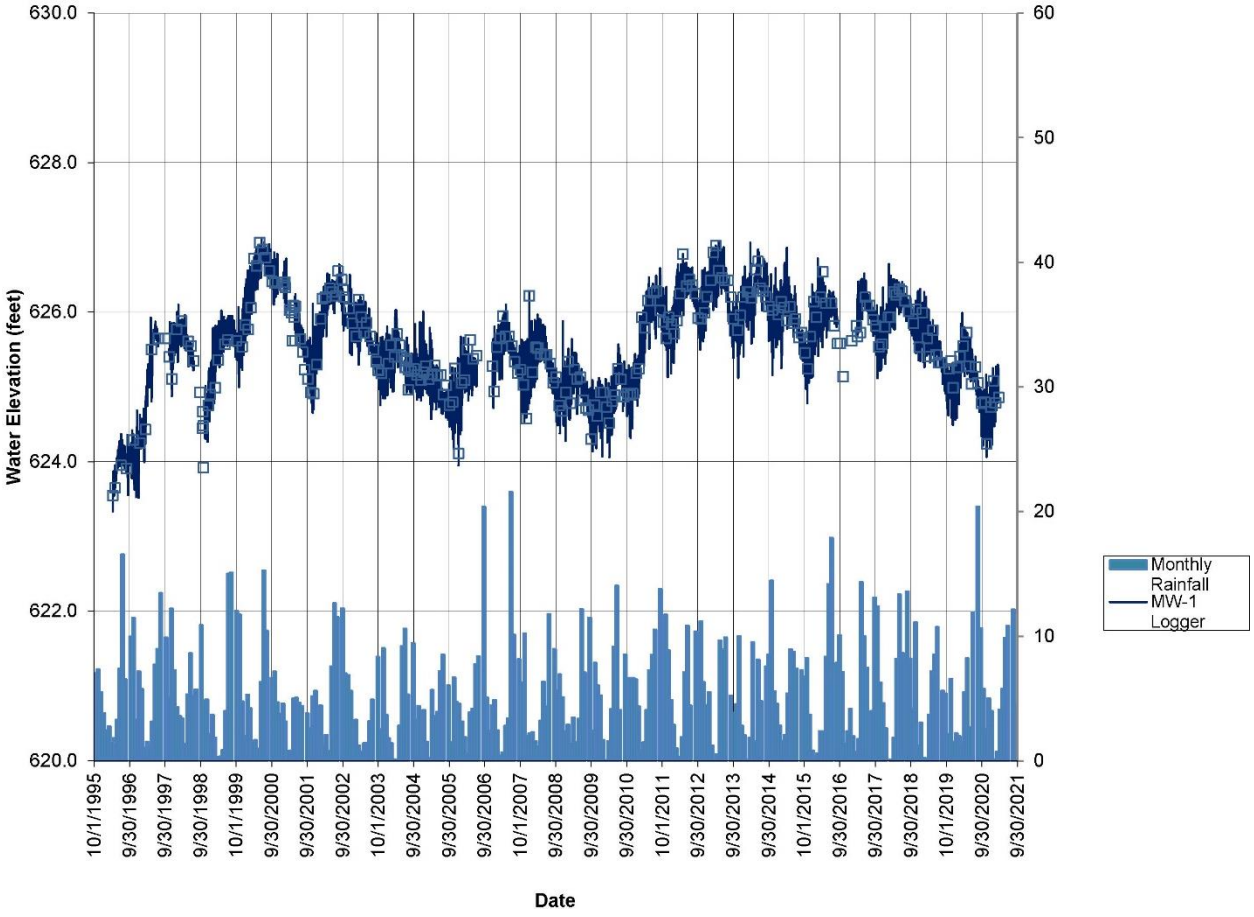
Source: AESI, 2021.

The use of Snoqualmie Ridge groundwater level monitoring as an analog for consideration of potential impacts due to proposed site development at the Mill site is considered especially relevant for multiple reasons:

- The stormwater management approach for the initial phase of buildout at Snoqualmie Ridge included collection, treatment, and direct discharge to the Snoqualmie River, similar to the Mill site.
- The stormwater management approach included maintenance of hydrology to wetlands and stream systems, similar to the Mill site.
- Snoqualmie Ridge is mantled by a low-permeability geologic unit that limits recharge to underlying groundwater systems, similar to the Mill site.
- Precipitation at Snoqualmie Ridge is similar to the Mill site.
- Prior to development of Snoqualmie Ridge, concerns were expressed over potential reductions in recharge to groundwater related to construction of impervious surfaces, similar to the Mill site.

The groundwater level monitoring at Snoqualmie Ridge provides a long-term (25+ years) record of the trend of aquifer levels both prior and subsequent to extensive development. Exhibit 3.2-2 below shows this trend. No evidence of development-related reductions in the Lake Alice Aquifer levels has been noted in the 25-year period of record obtained from MW-1 since monitoring began in 1996. Groundwater levels have responded normally to seasonal and annual variations in precipitation. These findings are consistent with long-term groundwater level monitoring at other major master planned communities where sites were converted from forested uses to residential/ commercial/industrial uses.

Exhibit 3.2-2 Snoqualmie Ridge Groundwater Monitoring



Source: AESI, 2021.

Based on the extensive datasets available for analysis and the discussion in the Draft EIS, there is no evidence that recharge to underlying aquifer systems would be adversely impacted by the Proposal.

(3) Critical Aquifer Recharge Area (CARA)

As identified in the Draft EIS, Section 3.3, page 3-53, portions of Planning Area 1 are located within a Category 1 CARA. Certain land uses and facilities are prohibited or limited within Category 1 CARAs or are subject to planning and mitigation requirements, per City of Snoqualmie critical areas regulations (SMC 19.12.200). At this time, based on the uses identified in the EIS, none of the uses contemplated to occur within Planning Area 1 and located within the CARA are prohibited by the CARA regulations. It is acknowledged, however, that all possible commercial/industrial uses of the site cannot be identified at this time, and that some uses could be subject to the code's planning and mitigation requirements, including the adoption and implementation of best management practices (BMPs). As noted in the Draft EIS, above ground storage tanks constructed in a CARA need to comply with containment (primary and secondary) and corrosion protection requirements, for example, and several other uses must

implement BMPs with respect to their operations.

Draft EIS Section 3.5, Environmental Health, page 3-150, identifies mitigation measures that would apply to wineries and all future tenants whose operations involve the use or storage of hazardous chemicals. Tenants or owners would be required to prepare a Hazardous Substance Management Plan and 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. The Spill Prevention and Response Plan would describe how to contain an inadvertent release, cleanup a release, and correct the condition that allowed the release to occur. Clearly labeled spill response kits would be placed in the facility and used to address any spills. Hazardous chemicals would be stored in a contained area to prevent potential releases to the environment.

A BMP manual was submitted to the City in 2016, in conjunction with the Post Annexation Implementation Plan (AIP), and it addressed BMPs for existing, permitted on-site uses authorized by the Pre-Annexation Agreement. This version of the manual could be supplemented in the future to incorporate additional BMPs and mitigation measures that are specific to uses contemplated by the proposed PCI Plan. Alternatively, a new PCI Plan BMP manual could be prepared as a condition of approval of the PCI Plan, to incorporate any specific BMPs identified or required as PCI Plan conditions. Under either alternative, the approved BMP manual would be reviewed and supplemented on a periodic basis, as new business users of the site and the specifics of their operations are known.

3.2.2. Reduction in Recharge to Surface Water (Tokul Creek)

Several comments asserted there was no analysis of Tokul Creek or current low flows and groundwater support of low flows.

Response:

Draft EIS Appendix B contains an extensive description of the Tokul Creek Delta Aquifer and its relationship to the Snoqualmie Shallow Aquifer and surface water flow in Tokul Creek. The Tokul Creek Delta Aquifer is formed in the Vashon recessional delta deposits north of the Mill site and beneath the northern portion of the site underlying the more recent lacustrine deposits. Recharge to the Tokul Creek Delta Aquifer is from direct precipitation where the delta deposits are exposed at the ground surface north of the Mill site, which would not be impacted by on-site PCI Plan development. Additional recharge occurs from the Snoqualmie River Shallow Aquifer, which flows to the north below the north end of the Mill site and eventually merges with the Tokul Creek Delta Aquifer.

The Tokul Creek Delta Aquifer discharges into Tokul Creek north of the Mill site. As described in Section 1.2.4 of Draft EIS Appendix B, based on the flow monitoring results in the creek, aquifer flow (spring discharge) from the Tokul Creek Delta Aquifer ranges from about 3½ to 8 cubic feet per second (cfs). The Snoqualmie River Shallow Aquifer underneath the northern portion of the site flows to the north and ultimately merges with the Tokul Creek Delta Aquifer north of the site. This measured flow includes discharge into the creek from both the north and south.

According to data presented by Turney et al. (1995), groundwater on the northwest side of Tokul Creek also flows toward Tokul Creek. This suggests that Tokul Creek serves as a hydraulic barrier between the site and areas located northwest of Tokul Creek. Groundwater contours within the Snoqualmie River Shallow Aquifer and the Tokul Creek Delta Aquifer are shown on Figure 13 of Draft EIS Appendix B.

The Tokul Creek Delta Aquifer has been encountered in a Mill site well (EB-1) underlying the recent lacustrine deposits. Several wells north of the site are completed in this aquifer, including EB-C1W, OWB-1 (NWF), OBW-2 (NWF), MW-3 (SSG), and SS&G#3. Water level measurements in these wells indicate that groundwater in the Tokul Creek Delta Aquifer flows toward the west to northwest with a hydraulic gradient of approximately 3%. North of the Mill site at the NWF, the aquifer has been documented to be about 140 feet thick. EB-1, completed near the northwest corner of the Mill site, encountered Tokul Creek Delta deposits at a depth of approximately 55 feet and was saturated below a depth of about 65 feet. The extent of the Tokul Creek Delta Aquifer is limited by the distribution of the recessional deltaic deposits.

The Tokul Creek Delta Aquifer is unconfined, bounded by bedrock to the north and west, and is interpreted to pinch out beneath the northern portion of the Mill site (Figure 7 of Draft EIS Appendix B). Recharge to the Tokul Creek Delta Aquifer is primarily from direct precipitation falling on the highly permeable sands and gravels of the delta complex, which are located off site from the Snoqualmie Mill site. Some additional recharge from the adjacent Snoqualmie River Shallow Aquifer also provides recharge to the Tokul Creek Delta Aquifer.

Recharge amounts from the Snoqualmie River Shallow Aquifer to the Tokul Creek Delta Aquifer were estimated at about 4 to 5 cfs based on groundwater flow modeling completed for the NWF/SWF.

Since the Stormwater Management Plan will be designed to maintain hydrology to the on-site wetlands and other surface water features, recharge to the Snoqualmie River Shallow Aquifer will not be significantly impacted, and therefore, contributions to the Tokul Creek Delta Aquifer and recharge to the Tokul Creek Delta will not be significantly impacted due to site development.

3.2.3. Potential Reduction in Recharge to Wetlands

Comments asserted that groundwater was not sufficiently evaluated relative to the delineated wetlands.

Response:

The relationship between groundwater and 25 delineated wetlands was identified in Draft EIS Appendix B. Table 1.2-3 identified wetland elevations relative to on-site monitoring well EB-4. The on-site wetlands consist of two distinct types: (1) a seepage wetland, which receives water from groundwater seepage that is sourced, at least in part, outside of its topographic basin; and (2) a basin wetland, which receives water from within its topographic basin through surface runoff or interflow. The delineated wetlands were divided into five categories based on the

source of their hydrology: (1) Wetlands 12–15 are supported in part by the Snoqualmie River Shallow Aquifer; (2) Wetlands 1–7 are located primarily on the slopes west of the site and are supported by off-site groundwater sources; (3) Wetlands 8, 9, 19, and 24 appear to behave primarily as basin wetlands with limited groundwater contribution; (4) Wetlands 10 and 11 are supported primarily by Stream S-1 flowing from off-site sources, with a component of hydrology to Wetland 11 provided by groundwater on site; and (5) Wetlands 20, 21, 22, 25, 26, 27, 28, and 29 are generally above the elevation of the Snoqualmie River Shallow Aquifer and do not appear to be groundwater-supported.

The Stormwater Management Plan will be designed to maintain hydrology to the on-site wetlands and other surface water features. Recharge from basin wetlands will continue to provide limited recharge to the Snoqualmie River Shallow Aquifer, similar to existing conditions, which in turn will provide recharge to those wetlands hydrologically connected to the shallow aquifer.

3.2.4. Channel Migration Zone (CMZ) Impacts

Comments asserted that the Draft EIS does not include a discussion of channel migration and that proposed development in floodplain areas should be minimized.

Response:

Channel Migration Zones (CMZs) were identified and described in the Draft EIS Section 3.1.2 and Appendix B. CMZs are regulated under SMC Section 19.12.140 and are defined as "*the area along a river within which the channel(s) can be reasonably predicted to migrate over time as a result of natural and normally occurring hydrological and related processes when considered with the characteristics of the river and its surroundings as delineated on the Snoqualmie River Channel Migration Area Map, contained in Channel Migration in the Three Forks Area of the Snoqualmie River*" (King County Department of Natural Resources, Surface Water Management Division, Seattle, WA, 1996). The historic meander belt limits are imbedded in the Snoqualmie River Channel Migration Area Map and are illustrated on Figure 14 in Draft EIS Appendix B.

The King County report delineates CMZs along the Snoqualmie River in the vicinity of the site, categorizing areas into Potential Hazard Areas, Moderate Hazard Areas, and Severe Hazard Areas. Based on King County mapping, a section along the southwestern edges of Planning Area 1 and Planning Area 3 are within the Moderate Hazard Area. The majority of Planning Area 1 and the western portion of Planning Area 3 are within mapped Potential Hazard Areas (Figure 14 in Draft EIS Appendix B). Development is not limited in Potential Hazard Areas; however, only certain development or activities are allowed in Severe and Moderate CMZs. Per SMC 19.12.140(C), only the "*following activities are allowed within the severe and moderate channel migration zone:*

6. *Trails and boardwalks;*
7. *Forest practices;*
8. *Ongoing agriculture;*
9. *Bridges, utilities and transportation structures when no other feasible alternative exists;*

10. *Development with a primary purpose of protecting or restoring ecological functions."*

Potential adverse impacts due to channel migration will be mitigated by following the development standards described in SMC 19.12.140, which regulates channel migration and associated erosion hazard zones. Based on current site planning, new structures are not currently planned within either the Severe or Moderate Hazard Areas, except for the re-alignment of SE Mill Pond Road. As discussed further in Response 3.4.2 (3) and in the discussion in Chapter 2 of the Final EIS (Section 2.4, Alternatives Considered but Not Carried Forward), the proposed relocation of Mill Pond Road is constrained by fixed locations of the existing road alignment on the north and south ends and by wetlands. The north end is a fixed location of the road crossing of Stream 1 and the City's wastewater treatment plant. The south end is fixed by the existing road alignment as it parallels the west edge of Borst Lake. The eastern limit of the proposed relocated road is constrained by road geometrics and Wetland 28. The City will determine whether the proposed road re-alignment meets the requirements of the City's CMZ regulations.

3.2.5. Liquefaction Hazard Impacts

A comment requested additional information on the impact of liquefaction and mitigation measures. A comment noted earthquake risks (such as ground shaking and liquefaction) and stated that the Proposal should mitigate for the potential of a large earthquake.

Response:

Seismic hazards in the SMC are defined as "*those areas of the city subject to severe risk of earthquake damage as a result of seismically induced landslides, earth adjustments, settlement or soil liquefaction."* Liquefaction hazards and associated potential for lateral spreading are described in detail in Draft EIS Appendix B, along with mitigation recommendations.

The Mill site is underlain by relatively soft, saturated sediments that may amplify the ground motion during a seismic event. These materials are also potentially at risk of liquefaction during a design-level seismic event, shown as a Seismic Hazard Zone on Figure 18 in Draft EIS Appendix B.

A liquefaction analysis was completed for the site in accordance with guidelines published in Seed & Idriss (1982), Seed et al. (1985), and Kramer (1996). The liquefaction analysis was completed with the aid of LiquefyPro computer software Version 5.8h (2009) by CivilTech Corporation. The liquefaction analysis was conducted based on the subsurface conditions encountered in the cone penetrometer tests (CPTs) advanced at the site. The analysis determined that subsurface conditions encountered at the site are predicted to experience liquefaction during a design-level seismic event.

Lateral spreading is a hazard on sites where liquefaction-prone material is located near exposed slopes and would include areas near the banks of the Snoqualmie River. The liquefied soil layers and non-liquefiable overburden may spread horizontally toward the water due to the reduction of soil strength and lack of confinement on the water side. The potential lateral displacement in Planning Area 1 was calculated at a distance of 100 to 150 feet from the Snoqualmie River.

Analysis indicates that the magnitude of lateral spread could be on the order of 1 to 2 feet toward the shoreline for a design seismic event. Additional analyses will be necessary when development plans are formalized and more subsurface information is available in accordance with building code requirements.

Preliminary static and seismic slope stability analyses were completed for the bank along the Snoqualmie River adjacent to the current SE Mill Pond Road where a future road re-alignment and roundabout for the Phase 1 development are planned. The slope stability analyses indicate that the minimum factor of safety for the static condition is greater than 1.5, but for seismic conditions the factor of safety is below 1.0 and thus below acceptable thresholds. Possible mitigation options identified in Draft EIS Appendix B for consideration to address seismic stability include the following:

11. Relocation of the new road alignment and roundabout with a setback sufficient that a slope failure would not impact the road. The stability analysis indicates that a setback of about 70 feet would be necessary from the top of the existing river bank. Review of the current plans appears to show the roadway alignment from 80 to 100 feet from the river bank.
12. Installation of 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. With this option, the river bank would be allowed to experience failure during a strong earthquake, but the ground behind the continuous wall would remain in place so that the roadway could remain in service.
13. Use of ground improvement methods (such as stone columns or deep soil mixing) to strengthen weak native soils presumed to exist beneath the river bank and adjacent area near the top of the bank. The analysis indicates that stone columns or deep soil mixing would be needed to depths of about 70 feet below the existing roadway elevation and need to extend about 30 feet back from the top of the river bank.

Liquefaction-induced settlement is estimated to range from 2 to 8 inches. Preliminary analysis suggests that structures in Planning Area 1 located near the northern bank of the Snoqualmie River could experience horizontal displacement due to lateral spreading on the order of 1 to 2 feet if not designed appropriately. Potential risks of damage to the new structures resulting from settlement and lateral spreading can be mitigated by requiring any future on-site structures to be supported on deep foundation systems or the use of other ground improvement techniques to mitigate settlement risks.

3.2.6. Sediment Aggradation & Storm Events

A comment provided a statement about sediment aggradation and the potential for effects on upstream gravel bars but did not specifically identify a specific concern related to the Proposal or the Draft EIS. A comment provided a statement about atmospheric river storms, suggesting that they will increase in frequency and intensity, and provided a reference to a storm system that occurred on January 7–8, 2009.

Response:

The comment regarding sediment aggradation and potential effects on upstream gravel bars is acknowledged. The PCI Plan would not affect upstream gravel bars in the Snoqualmie River. Sediment aggradation is a natural geological process. Sediment eroded higher in the watershed ultimately accumulates in the river system. The base level for the upper Snoqualmie River (above the Falls) is controlled by the elevation of bedrock at the top of the Falls. There is no additional space left to accommodate the sediment coming in from upstream sources, resulting in aggradation. The river is low gradient above the Falls through the City of Snoqualmie to North Bend. The carrying capacity (ability to move sediment) of the river where gradients are low is primarily limited to fine-grained material and sands with relatively lower amounts of gravels. There is not sufficient energy in the low-gradient reaches of the river, even in large storm events, to effectively move the bulk of the large gravel/cobble/boulder material contained in the gravel bars downstream in short time periods.

The comment regarding storm events is acknowledged. The Proposal has no influence over rainfall events in the watershed. The proposed PCI Plan is being designed to avoid causing an increase in flooding potential by maintaining available flood storage capacity at the project site, and by reducing the potential for additional sediment erosion and transport to the Snoqualmie River. Additional information is provided in Response 3.4.1.

3.2.7. Soil Characterization Data

A comment expressed concern that soils and current soil characterizations could change over time.

Response:

The soil references presented in the Draft EIS are based on the available information provided by the United States Department of Agriculture (USDA) Soil Conservation Service (SCS), subsequently identified as the Natural Resources Conservation Service (NRCS). The 1992 reference date reflects the most recent version of the available soil maps produced by the SCS/NRCS for the project area. Subsequent online versions of the soil map are based on the original 1992 map product. Draft EIS Appendix B on page 1.2-1 states: "*Based on extensive subsurface exploration, SCS soil extents were edited to more closely match site-specific conditions*." For additional information concerning the methodology and conclusions, please refer to Draft EIS Appendix B and to the Associated Earth Sciences, Inc. Geotechnical Report (2015); the latter report was attached to the Annexation Implementation Plan (AIP), which the City approved in 2016. No additional soil mapping updates are available or necessary to characterize site soils for the EIS. It would not be appropriate to speculate if or how soils might change over time.

3.2.8. Landslide & Steep Slope Areas

Comments expressed concern and requested assurance that no development will occur in Landslide/Steep Slope Hazard Zone 2.

Response:

The purpose of an EIS is to provide impartial discussion of significant environmental impacts and reasonable alternatives, including mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality. It is not the purpose of an EIS to provide assurances about where development will or will not occur; that decision will be made by the City Council in its PCI Plan decision.

With respect to the comment's reference to landslide/steep slope hazard areas, no Zone 2 Landslide/Steep Slope Hazard areas are mapped within the Planning Area 1 development limits. Zone 2 areas are limited in extent in or adjacent to Planning Areas 2 and 3. Draft EIS Appendix B (page 1.2-34) states: "*Zone 2 is considered to possess a low to moderate risk of landslides if disturbed by improper grading/clearing or uncontrolled drainage. In their existing conditions these areas do not show evidence of slide activity*." Draft EIS Appendix B (beginning on page 1.4-7) provides mitigation recommendations for any development activities that may occur within limited areas mapped as Landslide/Steep Slope Hazard Zone 2. Eliminating any potential for development as a mitigation measure would not be warranted in view of the limited extent of Zone 2 areas, classification as low/moderate hazard, mitigation measures identified in the Draft EIS, applicable SMC requirements, and geotechnical engineering recommendations identified in the Draft EIS.

3.2.9. Future Geotechnical Review

A comment requested assurances that site development plans will be reviewed by the geotechnical engineer. Another comment requested assurances that deep foundations or ground improvement, TESC Plan development/review, and seasonal limitations on earthwork will occur. Comments stated that geotechnical analysis of future development phases, including the steep slopes in Planning Area 3, should be performed now.

Response:

Geotechnical review of site development plans is standard practice and will occur as part of the City's review of civil engineering documents, which is anticipated to occur after PCI Plan approval and prior to or contemporaneous with building permit approval. A signed/stamped letter from the geotechnical engineer indicating that the plans have been reviewed and have incorporated applicable geotechnical engineering recommendations is a standard development requirement.

Foundation support and ground improvement evaluation/analysis and detailed design recommendations for adequate support system alternatives will be integral to project design following PCI Plan approval. Development plans will be subject to geotechnical engineering review and City peer review prior to issuance of required building permits. TESC Plans will be developed by the project civil engineer and will be subject to review by the project geotechnical engineer and peer review by City engineers. Any seasonal grading or ground cover restrictions would be incorporated in conditions of approval as warranted.

Regarding comments questioning the use of a phased approach to performing some detailed geotechnical analysis, including the steep slopes in Planning Area 3, please refer to Response 3.1.2. The Proposal is using a phased approach to environmental review, as permitted by the SEPA Rules, to perform detailed analyses for some elements of the environment. Detailed site planning for Planning Area 3 has not occurred, and PCI Plan approval by itself would not authorize any development to occur in Planning Area 3. It is acknowledged that some commenters would prefer that all detailed analyses occur now, but that is not required by the SEPA Rules and is not the approach being taken with phased environmental review.

3.3. AIR QUALITY/GHG

Comments stated that the Draft EIS does not address climate change and that air quality impacts are not identified or mitigated. Comments stated that measuring project impacts as a percentage of total greenhouse gas (GHG) emissions is not appropriate, and that King County GHG reduction targets apply to the project. Comments expressed disagreement with the assumption that the Proposal would not cause an impact because there are no standards. A comment stated that the project should be evaluated separate from City GHG emissions. Another comment stated that the project is not limiting emissions. A comment expressed disagreement with a statement in the Draft EIS that autos would achieve higher miles per gallon over time and stated that the analysis should exclude that variable. A comment disagreed with the assumed decline in carbon dioxide (CO_2) emissions. A comment questioned what the result would be if fuel standards were reduced. A comment stated that no green buildings are proposed.

Response:

The analysis in Section 3.2 of the Draft EIS references trends in miles per gallon (mpg) and fuel standards over time that result in reduced emissions. The EIS analysis cites the source of this trend, and reasonably relies on this documented information; the analysis cannot reasonably ignore documented trends or speculate that well-established trends could possibly be reversed in the future due to hypothetical and unknowable legislative change. The analysis also cannot manipulate other possible variables to produce a different result or a worst-case scenario, nor is it required to.

Comments that the Draft EIS does not evaluate air quality impacts or climate change are noted but are not accurate. Similarly, comments disagreeing with documented trends in mpg/fuel standards and CO_2 emissions are noted, but are also inaccurate.

The Draft EIS analysis describes state-wide GHG reduction targets, which apply to cities and counties, but individual projects are not currently subject to the targets. The background discussion on pages 3-30 and 3-31 of the Draft EIS indicates that GHG emissions are an element of climate change, and Draft EIS Exhibit 3.2-4 identifies GHG emissions for each land use included in the proposed PCI Plan. The EIS does not state or assume that there would be no impact because there are no adopted standards against which to measure GHG emissions. Rather, the discussion is intended to indicate that the absence of regulatory standards and local data makes it impossible to determine the magnitude or significance of any impact.

As stated in the Draft EIS, the City of Snoqualmie has not yet calculated city-wide GHG emissions, and absent such local data, it is not possible to measure or evaluate Snoqualmie Mill's GHG emissions in a context of the overall emissions in the City of Snoqualmie. The EIS provides a comparison to Washington State GHG emissions. A 2017 GHG Inventory Update report, published by King County in 2019, estimated total GHG emissions of 20,108,400 metric tons. The annual GHG emissions of the Snoqualmie Mill PCI Plan are estimated to be 32,490 metric tons at buildout, which is an increase of 0.0016, or 0.16%. The discussion also points out that the calculations do not account for design requirements included in applicable building

codes, which would reduce GHG emissions and impacts. Therefore, the Draft EIS evaluation of GHG likely overestimates the Proposal's potential impacts by some degree.

The comment that the Proposal's air quality impacts would not be mitigated is not accurate. Please refer to the mitigation subsection in the Air Quality section of the Draft EIS (page 3-43), which identifies numerous mitigation measures and requirements related to construction activities.

Regarding a comment on the absence of green buildings, Chapter 2 of the Draft EIS (page 2-31) notes that the applicant has committed to establish a goal of LEED Gold or Platinum certification to achieve energy efficiency in buildings. This goal would be included in design guidelines.

3.4. WATER RESOURCES – FLOODING & STORMWATER

3.4.1. Floodplain Analysis and Compensatory Storage

(1) Removal of Previous Fills and Adequacy of Floodplain Analysis

Comments expressed concerns regarding the Snoqualmie River floodplain and flood-prone areas of the City of Snoqualmie. Several comments provided background information and opinions regarding flooding history, the history of the Mill site, and fill placed over decades of growth of Mill site industrial activities through the early–mid 20th century. The most recent incident commented on was the placement of fill along Mill Pond Road, often referred to as the "berms" or "illegal fill berms." This fill has been a topic of discussion and litigation between the City and King County for some time. Some comments provided extensive histories, asserting the commenters' understanding of fill placement and corresponding floods that occurred from the 1950s through the early 2000s. Some of these comments also provided excerpts from subsequent flood studies, and contemporaneous King County correspondence. One comment alleged the existence of a conspiracy in the past to improperly modify flood data. Some comments asserted that the removal of past fill is a requirement of the development of Snoqualmie Mill, and removal of past fill should not be considered as compensatory storage for proposed floodplain fill in the areas of PCI Plan development.

Comments suggested that additional coordination would be needed with King County for the construction and future maintenance of the proposed stormwater outfall if the removal of a portion of the existing Mill Pond Road is part of the King County revetment system. Additional comments suggested that flood modeling be reviewed and confirmed prior to permitting, and that King County should be involved in the process for revising flood maps.

Response:

Fill that was placed by past operations of the Mill site that pre-date grading, development, or flood hazard regulations is considered "legal fill" and the "existing condition" for purposes of EIS analysis. It is acknowledged that it has long been asserted that the most recent fill, "the berms" along Mill Pond Road, was not placed legally. It is also understood that there has been consensus for some time that these berms should be removed as part of the PCI Plan; removal of the berms is, in fact, an element of the proposed PCI Plan. Please refer to Chapter 2 in the Draft EIS and Final EIS, which provide an overview of City appeals of County action regarding the fill. Response 3.8.1 also contains information about provisions in the Snoqualmie Comprehensive Plan relating to the removal of the fill and berms.

Comments contained a great deal of information about past floods and numerous flood studies, in particular as they relate to the berms. It is important to note that most past reports and information in correspondence related to elevations were reported in NGVD 29 vertical datum, and all elevations in the Draft EIS are reported in NAVD 88 vertical datum, which represents a difference of about 3.6 vertical feet.

The proposed grading for Snoqualmie Mill includes regrading areas of these berms to be consistent with surrounding nominal grades of the site, or in some cases lower to increase floodplain storage. Some filling within the floodplain is proposed as part of the PCI Plan in areas of future buildings. Areas of excavation are proposed as compensatory floodplain storage. Removal of fill or lowering of grades below the Base Flood Elevation (BFE) is considered as compensatory storage for proposed floodplain fill for the PCI Plan. The current existing ground elevation was considered in the modeling and analysis of the BFE and floodplain impacts and found to be consistent with all BFEs published and regulated by the Federal Emergency Management Agency (FEMA). These elevations are based on the following documents:

- The 2005 Flood Insurance Study by FEMA establishing updated BFEs for the Snoqualmie River.
- The 2010 Letter of Map Revision (LOMR) approved by FEMA and sponsored by King County and the City of Snoqualmie revising the BFE and Flood Insurance Rate Map (FIRM) Panel between Snoqualmie Falls and the Meadowbrook bridge.
- The No Net Rise Hydraulic Analysis for the Snoqualmie River BFE provided in the Draft EIS (Appendix A, Master Drainage Plan).
- An updated Flood Insurance Study and FIRM by FEMA in August 2020 reflecting the most current regulated BFE for purposes of flood hazard regulations and floodplain fill.

The purpose of the 2010 LOMR was to reflect effects on the BFE and floodplain as a result of the Corps of Engineers 205 flood improvement project. (Part of the Snoqualmie Flood Reduction Project, the 205 Project widened the right bank of the river just downstream of the SR 202 bridge and removed an old railroad trestle that partly spanned the channel about 0.5 mile upstream from the SR 202 bridge. For more information, see page 3-48 of the Draft EIS.) The study for the LOMR revised the channel geometry and topography to reflect the 205 Project and more refined 2-foot topography provided by the City but did not revise channel or floodplain cross-sections upstream of the SR 202 bridge. The lower BFE published in the 2010 LOMR between SR 202 and the Meadowbrook bridge reflects a relative difference from the 2005 Flood Insurance study.

The No Net Rise Hydraulic Analysis provided in the Draft EIS (Appendix A, Master Drainage Plan) evaluated a “Duplicate Effective” model that merged the 2010 LOMR model with the 2005 FEMA model upstream of the Meadowbrook bridge. With some corrections to cross-section stationing and ineffective flow areas based on the Watershed Science and Engineering (WSE) and Herrera Environmental Consultants study for King County in 2016, a “Corrected Effective” model of the floodplain was created. The comparison of the “Corrected Effective” model to both the “Duplicate Effective” and the FEMA BFEs was shown to match exactly at four of seven cross-sections and within 0.1 foot at three of seven cross-sections and was deemed appropriate for modeling purposes. More detail about the WSE 2016 King County Study is provided in Response 3.4.1(2) below.

A very significant element of the analysis of impacts from the proposed Snoqualmie Mill PCI Plan is that both the “Duplicate Effective” and “Corrected Effective” models were revised to

update all cross-sections of overbank floodplain topography to reflect King County's high-resolution Light Detection and Ranging (LiDAR) topography from 2016. These revisions reflect the current condition of the Snoqualmie Mill site and a floodplain model at a resolution of 0.01 foot including the much-discussed berms. This modeled BFE, which considered the existing topography in high-resolution detail, did not materially differ from FEMA's regulated BFE in the current Flood Insurance Study.

This 2016 high-resolution topography "Corrected Effective" model was then used to define the "existing conditions" and "developed conditions" of the Snoqualmie Mill site for purposes of the No Net Rise floodplain analysis for the PCI Plan. The results were presented in the Master Drainage Plan (Draft EIS Appendix A). At all seven FEMA cross-section locations, BFE impacts are shown to be 0.00 foot between pre- and post-developed conditions.

Since the publication of the Draft EIS, FEMA published a new August 2020 FIRM for the Snoqualmie River. The following is a summary of the revised FIRM in the vicinity of the City of Snoqualmie and Snoqualmie Mill site:

- The 2020 FIRM reflects a revised naming convention for the floodplain cross-sections. The cross-section locations used in the Flood Insurance Study are unchanged but are renamed; for example, sections V, W, X, and Y as shown in the Draft EIS are now sections FN, FO, FP, and FQ, respectively.
- BFEs in the 2010 LOMR were published in NGVD 29 vertical datum. The 2020 FIRM re-published the BFE at the renamed cross-sections in NAVD 88 vertical datum.
- From review of the 2020 BFE and the datum conversion, there is no intended change in the BFE from the 2010 LOMR; differences in numerical elevations reflect only the change from NGVD 29 to NAVD 88 vertical datum.

The proposed stormwater outfall to the Snoqualmie River will require additional coordination and possible permitting with the King County Natural Resources and Parks Department – Water and Land Resources Division. The outfall will also require review and permitting by the Washington Department of Fish and Wildlife (WDFW). The stability of the King County revetment, along with habitat and long-term operation and maintenance, will also be considered.

During the civil engineering plan review process for the stormwater outfall, the City will determine whether additional modeling is necessary. King County's desire to be included in the discussion is noted.

The assertion that historical flood data were improperly modified in the past is acknowledged as the commenter's opinion; no further response is warranted.

(2) Flooding Impacts to the Lower Snoqualmie River Valley

Comments related to this concern focused on two primary issues.

First, comments pointed out that the Draft EIS made reference to the 2016 report by King County to study effects of the flood improvement projects (by the Corps of Engineers and Puget

Sound Energy [PSE]) on downstream flooding (WSE and Herrera Environmental Consultants, 2016). Comments asserted that there was inadequate evaluation of other basin and flooding trends that affect downstream properties, more specifically discussed in the subsequent 2018 King County study.

Second, stemming from the concerns that the flood improvement projects have caused increased downstream flooding impacts due to increased channel capacity, comments questioned whether the broad swale proposed as part of Snoqualmie Mill could similarly increase flood flow and cause downstream flooding impacts. Comments also raised concern over the potential for erosion of such a swale and impacts to the river.

Response:

The 2016 King County study was referenced in the Draft EIS to acknowledge these downstream flood studies and the sensitivity to changes in the basin or the flood flow upstream of the Falls that could exacerbate these downstream flooding concerns. The Draft EIS did not intend to express agreement or disagreement with the merits of the complaints of downstream flooding that were analyzed in the 2016 King County Study or to ignore the complexity and variability of flood behavior in the Snoqualmie Valley evaluated in the 2018 King County study. The intent of the Draft EIS discussion was to acknowledge and address downstream concerns as they relate to a potential impact from the development of Snoqualmie Mill and the Proposal's compliance with flood hazard regulations.

The Master Drainage Plan (Draft EIS Appendix A) addresses compensatory storage per Snoqualmie flood hazard regulations, and it includes a hydraulic analysis of a No Net Rise Floodplain, as described above. For purposes of downstream analysis, the model of "developed conditions" for the Snoqualmie Mill site was used to update the model geometry of the HEC-RAS 1D unsteady state model of the Snoqualmie River that was developed for the previously referenced 2016 King County Study by WSE. This updated downstream model was then compared to results of the 2016 King County study. This is shown in Exhibit 3.4-1 below from the No Net Rise analysis under "*Existing Conditions*." Quoting from the No Net Rise Floodplain analysis in the Draft EIS Appendix A:

> *"The results of the downstream modeling, shown in Table 3 below, indicate that there will be no increase in downstream flooding and, in fact, the Planning Area 1 Condition will lower water surface elevations by approximately 0.01 feet at three of the five locations evaluated in the earlier WSE study…"*

Exhibit 3.4-1. HEC-RAS results for all conditions from the WSE split-flow 1D HEC-RAS Snoqualmie River Model at previously evaluated locations and No Net Rise comparisons for the proposed conditions (WSE and Herrera Environmental Consultants, 2016)

Location	River Mile	Existing Conditions (ft - NAVD 88)	Planning Area 1 Condition		Mass Grading Condition	
			Proposed (ft - NAVD 88)	Rise (ft)	Proposed (ft - NAVD 88)	Rise (ft)
PSE Weir	39.14	414.16	414.15	-0.01	414.16	0.00
Fall City Near Golf Courses	35.23	103.70	103.70	0.00	103.70	0.00
Patterson Creek	28.00	81.02	81.02	0.00	81.02	0.00
Below Tolt River Confluence	23.21	74.19	74.18	-0.01	74.19	0.00
City of Duvall	12.40	52.57	52.56	-0.01	52.57	0.00

Source: Draft EIS, Appendix A, Table 3.

As is evident from the results of the downstream modeling, the broad swale that is reflected as part of Snoqualmie Mill "Mass Grading Condition" would be designed in a manner to not improve or increase flood flow capacity of the Snoqualmie River. The swale is internal to the Snoqualmie Mill site and is contained within the floodplain areas designated as "ineffective flow" in the No Net Rise Hydraulic Analysis. The broad swale is planned to be excavated as part of the compensatory storage strategy, to be extremely low gradient and well-vegetated, to be maintained to minimize erosion, and to provide a predictable and consistent path for receding floodwater to return to the river following a flood peak.

This proposed design, together with the downstream analysis provided in the Master Drainage Plan (Draft EIS Appendix A), indicate that no significant impacts to downstream flooding would occur as a result of the floodplain fill or the proposed receding floodwater swale.

(3) Excavation for Stormwater Wetlands

Comments asserted a need for additional clarity of the proposed drainage control plan and the computation of compensatory storage for floodplain fill. More specifically, comments requested clarification whether the proposed excavations of stormwater wetlands to serve as water quality treatment for stormwater runoff are included as compensatory flood storage for floodplain fill. The comments asserted that these types of stormwater wetlands are designed to maintain a constant static water level and would not be available as additional floodplain storage during a flood event.

Response:

The Draft EIS (Appendix A, Master Drainage Plan) descriptions of the shallow groundwater conditions of the site included "seasonal high groundwater" elevations of the Snoqualmie Shallow Aquifer (as described by Associated Earth Sciences). These seasonal high groundwater

elevations were considered as the lowest elevation that any excavation could include as compensatory floodplain storage.

For most of the site, this elevation is 418.0 feet (NAVD 88). This is the case in the areas of proposed stormwater wetlands which, by preliminary design, have their static water level and overflow levels at elevation 418.0 feet. Therefore, none of the excavations of proposed stormwater wetlands are considered in the computation of compensatory floodplain storage. Spillway outfalls are intended to be very wide to create overland flow to the wetlands. The rise in water level above 418.0 feet during outflow even in extreme events (e.g., 100-year local runoff) would be insignificant and was not considered lost storage in this environmental analysis.

3.4.2. Temperature Impacts to the Snoqualmie River

(1) Concern Regarding Proposed Wetland Buffers and the Snoqualmie River's Low Tolerance for Additional Temperature Impacts due to Poor Vegetation Canopy on its Tributaries

Comments asserted that the Draft EIS does not adequately evaluate impacts to temperature of the Snoqualmie River as a 303(d)-listed water body for temperature and should require restoration of canopy trees and vegetation. The comments were primarily based on the Draft EIS disclosure that there could be potential impacts to temperature. In addition, comments took issue with the Draft EIS stating that considering the low volumes of runoff compared with the river flow, probable impacts would be insignificant. The comments asserted that the Draft EIS lacks information and evaluations from the 2011 Total Maximum Daily Load (TMDL) report that the river is a temperature impaired water body. Comments suggested that the Draft EIS should better address the TMDL report and how the Proposal would meet required Waste Load Allocations (WLA) for the temperature of stormwater discharge.

Themes common to most of these comments include the following:

- The temperature of wetlands or stream tributaries to the river due to lack of vegetation canopy.
- The temperature of stormwater runoff from the future direct discharge of paved areas of the Mill site to the river.
- Benefits to the Snoqualmie River from opportunities for restoration and revegetation along its banks, such as relocating the existing Mill Pond Road to the east.

Response:

The 2011 TMDL and the 2016 King County (Hot Water and Low Flow) reports document that the Snoqualmie River often flows at temperatures that are harmful for salmonids. Monitoring and evaluations undertaken by these reports of the upper forks and the mainstem find that there are large frequencies and durations of river flow above Ecology thresholds for temperature. However, the discussions of concern revolved primarily around two sources of

temperature impact:

- Point source discharges from permitted facilities.
- Vegetation canopy and shading and the impacts from portions of the upstream forks and the mainstem that lack adequate vegetation.

The concern over vegetation and canopy for adequate shading focuses on the banks of the river and upper forks themselves, with less concern over other stream tributaries, including tributaries that receive high levels of stormwater from developed surface water runoff. Data were gathered as part of the TMDL from six tributary streams (Kimball, Harris, Griffin, Cherry, Tuck, and Patterson Creeks) as well as the larger South Fork of the Snoqualmie River, during storm events during the months of August and September. This resulted in the following finding excerpt from the 2011 TMDL report:

> *"…daily maximum stream temperatures showed that four of the six small tributary streams decreased in temperature, while two, Harris and Griffin, slightly increased. Of these six streams, just Kimball Creek drains an area with large amounts of pavement nearby. The remaining small streams primarily drain farm land…"*

The conclusions and recommendations of the TMDL are primarily for permitted facilities to maintain compliance with state temperature discharge standards and WLAs, and to improve riparian and river bank vegetation, in-stream channel complexity, and tributary riparian restoration.

To that end, a significant element of the PCI Plan is the enhancement and restoration of mostly degraded buffers along on-site wetlands and streams. There are some questions in the comments regarding references to water quality sampling. The referenced sampling was performed during the preparation of the *Sensitive Areas Study* issued in 2016, which was incorporated in the City's approval of the Post Annexation Implementation Plan (AIP). The purpose of the sampling was to assist in determining which portions of the on-site Wetland 12 system should be considered as fish-bearing.

It was known at the time of the Sensitive Areas Study that most buffers on the site are in poor condition for both habitat and shade. In the PCI Plan, significant buffer reductions are proposed in some locations. In total, however, the area of buffer provided will be equivalent to the total area of standard buffers required per the City Code (SMC 19.12.170.I). The proposed areas of maximum intrusion into the standard buffer dimension are for the water quality stormwater wetlands.

As discussed below, the 2011 TMDL concludes that stormwater and direct discharges to the mainstem of the Snoqualmie River do not contribute to temperature impairment of the river. Notwithstanding this, all areas of the project site proposed for enhancement and restoration will represent a significant improvement to current conditions and provide shading opportunities for static wetland water that does eventually drain to the river.

(2) Concern Over Potential Temperature Impacts to the Snoqualmie River from PCI Plan Stormwater Direct Discharge

Please refer to the prior summary of stormwater-related comments in subsection (1) above.

Response:

Direct discharge of project site stormwater to the Snoqualmie River was selected because infiltration is not considered viable, as discussed in responses in Section 3.2.1 above, and direct discharge would not adversely affect groundwater in the shallow aquifer that connects with the river. Furthermore, as discussed in the following paragraphs, the design would maintain summer baseflows, and the expected summer direct discharges are very small relative to river flow volumes. Therefore, direct discharge of stormwater is not expected to adversely affect temperature in the Snoqualmie River.

Per the TMDL, all point source discharges in the watershed must comply with the waste load allocations established in the TMDL. The point sources identified by the TMDL are the Duvall, Carnation, Snoqualmie, and North Bend wastewater treatment plants (WWTPs) and the Tokul Creek and Boxley Creek Fish Hatcheries. It states that other "non-stormwater" permitted facilities in the basin are not a concern for water temperature because they do not discharge during the critical months of June–September.

With regard to stormwater, the 2011 TMDL report states:

> *"Wasteload allocations (WLAs) are necessary for stormwater sources if they are determined to be a source of pollutant loading. At the current time, stormwater does not contribute to temperature impairment in the Snoqualmie Watershed; therefore, a WLA is not needed…"*

The TMDL report also concludes that concern about thermal pollution from stormwater in the future is low because of regulations now required under National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Stormwater Permits, which are included in the 2012/2014 Ecology Stormwater Management Manual for Western Washington and the 2016 King County Surface Water Design Manual. However, Ecology plans to continue to monitor and collect data for larger stormwater discharges around Puget Sound to be evaluated as potential sources of thermal pollution to streams, and the TMDL concludes that:

> *"Smaller discharges, those with flows less than 1% of the receiving water flow, are considered to have negligible individual impact on stream temperature. Additionally, direct stormwater discharges to the mainstem and Middle Fork Snoqualmie River are not large enough in comparison to the receiving water to raise water temperatures…"*

The *Margin of Safety* in the TMDL report includes analysis of a "worst-case" conditions of the river as the lowest 7-day average flow during July and August with a recurrence interval of 10 years (7Q10) and a "typical-case" as the lowest 7-day average flow during July and August with a recurrence interval of 2 years (7Q2). The Snoqualmie River flows for these conditions were reported to be:

- Snoqualmie River 7Q10 at Snoqualmie = 368 cfs.
- Snoqualmie River 7Q2 at Snoqualmie = 501 cfs.

The direct discharge area would be collected in storm drains and treated through a basic water quality treatment system or basic treatment swales in parking areas or open space and discharged to the river. The Master Drainage Plan (Draft EIS Appendix A) contains modeled flow rates for this direct discharge for 2-year through 100-year storm flows.

From these Draft EIS comments and review of the concerns over temperature impacts from the Proposal, the runoff model created for the Snoqualmie Mill PCI Plan was used to analyze and compare site stormwater direct discharges during the months of July and August to these typical and worst-case scenarios of the TMDL. Runoff discharges from the Snoqualmie Mill site are ephemeral, or essentially nonexistent during those summer months. Site discharges during July and August only occur during rainfall events; therefore, a low-flow analysis of 7-day average flows is not feasible. Alternatively, a frequency analysis using the Western Washington Hydrology Model (WWHM, from the Ecology Manual) "highest" average flows as opposed to "lowest" average flows was completed. Therefore, the results below represent a very conservative comparison of the maximum 7-day average direct discharge runoff during July – August with recurrence intervals of 2 years and 10 years, with the 7Q2 and 7Q10 for the river which are the lowest 7-day average river flow during July – August with the same recurrence intervals:

- Snoqualmie Mill site maximum 10-year 7-day direct discharge = 0.562 cfs *(less than 0.16% of 7Q10 of the river).*
- Snoqualmie Mill site maximum 2-year 7-day direct discharge = 0.244 cfs *(less than 0.05% of 7Q2 of the river).*

Both represent well below 1% criteria for negligible thermal impact on the receiving river flow.

(3) Opportunities for Additional Restoration and Revegetation of Buffer along the River Bank by Relocation of the Existing Mill Pond Road to the East and Adequacy of Public Trails

Comments suggested that there could be opportunities for a greater buffer and restoration of the river bank revegetation if Mill Pond Road were relocated farther to the east. This was again related to the TMDL report and the 303(d) listing of the river for temperature, primarily due to the need for greater bank vegetation for shading in the mainstem and upstream tributaries.

The Proposal's trails, facilitated in part by the reconstruction and relocation of Mill Pond Road, also elicited comments about public trails and whether the City of Snoqualmie was complying with commitments for connections to the Snoqualmie Valley Trail (SVT).

Response:

The Draft EIS acknowledges that additional buffer dimension and vegetation along the banks of the river would be a benefit to the river. The proposed PCI Plan would relocate and reconstruct

of a portion of Mill Pond Road. This is due in part to the potential instability of the existing road, which could be prone to seismic failure. The relocated and reconstructed portion of the road would provide safe and stable ingress and egress to the Snoqualmie Mill site. This proposed design would also provide the opportunity to remove and convert portions of the existing road to revegetated and restored river bank buffer. Some comments acknowledge that the project is not required to remove or relocate Mill Pond Road but questioned whether the road could be moved farther east and provide more opportunity for additional river buffer.

The proposed relocation of Mill Pond Road is constrained by fixed locations of the existing road alignment on the north and south ends. The north end is a fixed location of the road crossing of Stream 1 and the City's wastewater treatment plant. The south end is fixed by the existing road alignment as it parallels the west edge of Borst Lake. The eastern limit of the proposed relocated road is constrained by road geometrics and Wetland 28.

The future access to Planning Area 3 was explored as a potential access point with a connection to 396th Drive SE in lieu of the existing southern extension of Mill Pond Road. The analysis of transportation in the Draft EIS and traffic impacts advised against abandoning Mill Pond Road and utilizing 396th Drive SE. The connection to Planning Area 3 would, however, serve as one of the opportunities for an east-west trail connection to the Snoqualmie Valley Trail. An east-west connection to the SVT is proposed as part of the PCI Plan but would not occur while DirtFish remains in operation.

Note that Chapter 2 of the Final EIS (Section 2.4) describes additional alternatives that were considered for inclusion in the EIS but were not carried forward for detailed analysis because of various factors. Moving Mill Pond Road is one potential alternative that was considered but rejected due in part to the reasons indicated in this response. Other alternatives considered include reducing building coverage and modifying proposed land uses.

3.4.3. Direct Discharge and Wetland Hydrology

(1) Analysis of Wetland Hydrology as Defined by the Ecology Stormwater Management Manual and the 2016 King County Surface Water Design Manual

Comments suggested that clarification is needed regarding the applicability of the direct discharge designation and flow control exemption of Snoqualmie Mill together with the need to maintain hydrology to local wetlands and streams.

Other comments related to the application of Ecology Guidelines (and King County Surface Water Design Manual Guide Sheet 3B) for maintenance of wetland hydrology. Comments requested clarification of whether the analysis of wetland hydrology adequately accounts for groundwater or whether only surface water impacts are reflected.

Response:

The direct discharge designation and flow control exemption for Snoqualmie Mill is clearly outlined in the Regulatory Environment discussion of the Draft EIS (Section 3.3.1) and Master Drainage Plan (Draft EIS Appendix A). The criteria for such designation and exemption are clear

in both the Ecology Manual for Western Washington and the King County Surface Water Design Manual. An abbreviated summary of the primary criterion for this designation applicable to Snoqualmie Mill is as follows:

2016 King County Surface Water Design Manual

- The flow path from the project site discharge point to the edge of the 100-year floodplain of the major receiving water will be no longer than a quarter mile.
- Manmade conveyance facilities shall extend to the ordinary high-water mark of the receiving water.
- The direct discharge proposal will not increase or decrease flows to existing wetlands or streams sufficient to cause a significant adverse impact.

Ecology Manual, Appendix A I-E, Flow Control Exempt Waters

- Properties with direct discharge to exempt receiving waters shall maintain hydrology to proximate wetlands and streams.
- Direct discharge shall be drained by a conveyance system that is comprised entirely of manmade conveyance elements (e.g., pipes, ditches, outfall protection, etc.) and extend to the ordinary high-water mark of the exempt receiving water,

As stated in the Draft EIS, Master Drainage Plan, Appendix A, the Snoqualmie River is designated by Ecology as a *Flow Control Exempt Receiving Water* and a *Basic Treatment Receiving Water*.

Some clarification is warranted in the application of Guide Sheet 3B for evaluation of wetland hydrology. The analysis in the Master Drainage Plan refers to evaluating surface water runoff impacts to the wetland but does not including groundwater, while the evaluation under Guide Sheet 3B is for total flow changes to wetland hydrology, total flow being *surface + interflow + groundwater*.

The evaluation of hydrology impacts in the Draft EIS did properly apply the Guide Sheet 3B analysis of surface runoff, interflow, and groundwater. The use of the WWHM model accounts for surface water runoff, interflow, and a groundwater component from pervious areas generated by precipitation. All these components are included in the analysis in what is referred to as surface water impacts.

The discussion in the Draft EIS of an exclusion of groundwater hydrology of the wetlands refers to any attempt to quantify a component of hydrology in certain wetlands that is a direct reflection of the Snoqualmie River Shallow Aquifer. This is a baseline condition of these wetlands and would not change under post-developed conditions. The modeling under Guide Sheet 3B is an evaluation of potential impacts to wetlands due to surface water runoff, interflow, and groundwater from precipitation due to development.

(2) Borst Lake

Several comments focused on whether the Draft EIS provides an adequate analysis of hydrology

and hydrologic impacts to Borst Lake or stated that impacts were not analyzed. Comments questioned whether the lake was appropriately described as a manmade lake instead of a modified oxbow, why the ordinary high-water mark of the lake was undetermined, and why there was not more analysis of lake hydrology similar to the on-site wetlands.

Response:

The Draft EIS (Appendix A, Master Drainage Plan) described Borst Lake in detail (specifically, in Sections 4, 5, and 6, as well as in references to the groundwater studies in Draft EIS Appendix B [Soils, Geology, Groundwater, and Geologic Hazards Report]). Borst Lake was described as a "manmade" lake, albeit Draft EIS Appendix A did not comment on the existence of an oxbow prior to the formation of the lake by the Snoqualmie Falls Lumber Company.

The Draft EIS (and Appendices A and B) provided information regarding Borst Lake's history as a "managed lake." Analysis of groundwater included many years of monitoring of both groundwater levels and surface water levels of Borst Lake to understand the relationship between them. Monitoring data included periods of managed augmentation and periods where augmentation had ceased. Data included periods of lake outfall failure, repair, and failure again. Consequently, static water levels in the lake have varied dramatically over time. Therefore, it was stated that an "ordinary high-water mark" was indeterminate. Conclusions are that changes or impacts that have occurred to the lake over time and future decisions regarding what would be good for the lake are independent of what may constitute a potential stormwater runoff impact from Snoqualmie Mill.

For the Draft EIS, the focus was to ensure that there would be no significant hydrologic impacts to the lake from the Snoqualmie Mill PCI Plan by demonstrating that there would be no significant change in stormwater runoff or hydrologic discharges from the Snoqualmie Mill site to Borst Lake.

Most of the runoff from the Snoqualmie Mill site that drains to the lake drains through the Wetland 12 ditch system. All runoff from the site that drains to the Wetland 12 system enters Borst Lake at one discharge point through "Stream 2." There are no areas proposed for development / site alteration of Planning Area 1 that drain to the lake other than through the Wetland 12 system. Therefore, the discharge point to Borst Lake from Wetland 12 was used as the point of analysis to demonstrate that there would be no significant impacts to Borst Lake.

The analysis included the wetland hydrology analysis of Wetland 12, described above, but also an impact analysis of peak flow frequency and flow duration of the Stream 2 discharges into Borst Lake. This analysis was shown to be consistent with and comply with the provisions described in the Ecology Stormwater Manual Appendix I-E for direct discharge.

(3) Hydrologic Impacts to All Wetlands on the Property are not Evaluated

Comments suggested that all of the wetlands on the Snoqualmie Mill site should have been analyzed for wetland hydrology or hydrology impacts. These also related to comments asserting that there should have been more analysis of impervious surfaces and runoff from Planning Areas 2 and 3.

Response:

The Draft EIS focused on evaluating *probable* impacts, which is the appropriate focus of an EIS. With respect to wetlands and wetland hydrology, actual analysis under Guide Sheet 3B of the King County Surface Water Design Manual was limited to those wetlands that could have probable significant adverse impacts due to the development of Planning Area 1 without mitigation.

A number of other wetlands on the site are in locations where there is no proposed alteration of land within the catchment area of these wetlands, apart from restoration of vegetation in degraded buffers. For this reason, in the future when similar modeling is performed for Planning Areas 2 and 3, some of these wetlands may not warrant analysis.

For Planning Area 1, three wetland systems warranted analysis under the guidelines for impacts:

- The main Wetland 12 system that ultimately collects most of the runoff from Planning Area 1 that does not directly discharge to the river.
- Wetland 28, which is an isolated wetland where a significant portion of Planning Area 1 site development is proposed within the wetland's catchment area.
- A portion of Wetland 12 called Wetland 12NW due to its proximity to a portion of Planning Area 1 and as a receiving water for two of the proposed stormwater wetlands for water quality treatment.

These wetland systems (which Planning Area 1 posed probable significant hydrologic impacts to) were analyzed per Guide Sheet 3B for the effectiveness of mitigation proposed for the PCI Plan and found to comply with those guidelines.

The relevance and the application of this analysis to Planning Area 2 and 3 is that the PCI Plan and mitigation strategy for Planning Area 1 demonstrate that compliance with the guidelines for maintenance of wetland hydrology is achievable. The assumption in the Draft EIS is that at the time a more detailed actual development plan for Planning Area 2 or 3 is sufficiently definite and proposed to the City, a similar mitigation strategy would be applied, and analysis would be provided in application documents demonstrating similar compliance. Additional SEPA review would also occur at that time.

The designation of the site as a Direct Discharge site concluded that the standard for runoff control is primarily twofold:

- Direct discharge to the Snoqualmie River.
- Manage hydrology of wetlands and streams so that stormwater runoff from site development does not cause a significant impact to their *existing* hydrologic conditions.

The existing hydrology of the wetlands and streams that receive runoff from Planning Areas 2 and 3 is affected by significant areas of existing impervious surface. There are no current development proposals for Planning Areas 2 and 3. Therefore, Planning Area 1 was used to develop ratios of buildings and impervious surfaces to pervious surfaces for landscape and open space within a given overall development area. These ratios were applied to Planning Areas 2

and 3 to estimate levels of future impervious surface and found that total future impervious surfaces of Planning Areas 2 and 3 are likely to be less than they are currently.

This led to the conclusion that there is a high level of confidence that a similar mitigation strategy for Planning Areas 2 and 3 to that shown for Planning Area 1 could be achieved.

3.4.4. Water Quality Treatment of Stormwater Runoff

(1) Clarification of Water Quality Treatment per Ecology and King County Surface Water Design Manual (2016)

Comments suggested that a higher standard of water quality treatment should be warranted, separation of roof and landscaping runoff from pollutant generating runoff should occur, or that the use of dispersion trenches and biofiltration is not sufficient to remove pollutants from commercial parking areas, in particular because Planning Area 1 would consist of mostly "new" and not "replaced" impervious surfaces. Other comments asserted that infiltration should be implemented as opposed to the direct discharge proposal. A comment questioned whether the Snoqualmie River is subject to stormwater controls.

Response:

As previously discussed, and stated in the Draft EIS, the Snoqualmie River is designated as a *Basic Treatment Receiving Water* by Ecology. Therefore, runoff from the Snoqualmie Mill site that will directly discharge to the river is allowed to provide basic water quality treatment in a manner consistent with the Ecology and King County stormwater manuals. All runoff from pollutant generating impervious surfaces that is discharged to wetlands or streams prior to draining to the river will be provided with enhanced water quality treatment in a manner consistent with the Ecology and King County stormwater manuals. The proposed stormwater wetlands would comply with the Ecology and King County standards for enhanced treatment.

These standards are intended to apply whether impervious surfaces are "new" or "replaced." Separation of non-pollutant generating surfaces from roofs or landscape areas from pollutant generating impervious surfaces is not a requirement for the design and function of these water quality treatment facilities. However, it will be a goal during final design to separate non-pollutant generating surface runoff for purposes of sheet flow to linear portions of wetlands and sizing of the stormwater wetlands.

The drainage control plan proposes to use dispersion trenches in certain locations as a means of diffusing point discharges into wetland buffers from non-pollutant generating surfaces, not as a water quality treatment BMP.

Infiltration facilities have been determined to be "infeasible" based on the evaluation of on-site soils and groundwater conditions, as documented in the Draft EIS (Appendix B) and addressed in responses in Final EIS Section 3.2.1. Therefore, irrespective of the direct discharge flows, infiltration is not proposed anywhere on the Snoqualmie Mill site.

3.4.5. Winery Wastewater Treatment

A comment expressed concern that winery wastewater could discharge directly to the Snoqualmie River during flood events. The comment acknowledged that pre-treatment is proposed but indicated that excavated channels that discharge to the City's wastewater treatment plant (WWTP), and any storage ponds that receive wine byproduct will need to be protected during storm events to prevent discharge of untreated effluent.

Response:

A great number of wineries operate and treat winery wastewater using excavated channels or ponds for wine byproduct, particularly in rural areas or areas where there is no connection to a wastewater treatment plant. The proposal for wineries at Snoqualmie Mill is to collect winery wastewater in the same manner but separated from domestic wastewater in closed underground piping systems that will contain winery wastes in the event of Snoqualmie River flood event.

The Draft EIS proposed that the separate winery waste would be provided pre-treatment prior to discharging into a closed lift station, together with the domestic wastewater. Domestic wastewater and pre-treated winery waste would then be pumped in a closed system to the Snoqualmie WWTP.

However, the City is currently considering an update to the General Sewer Plan, which began after the initial submittal of the Snoqualmie Mill PCI Plan application. Based on communication from the Public Works Department, it is now understood that the City is contemplating that it may be more beneficial to the operation of the WWTP for Snoqualmie Mill to *not* pre-treat the winery wastewater prior to discharge to the WWTP but, instead, for the Snoqualmie Mill to pay a pro rata share of the cost of any enhanced or winery-related treatment provided at the WWTP. The PCI Plan's wastewater system design would be updated to reflect applicable City direction.

3.5. PLANTS & ANIMALS, WETLANDS, & STREAMS

3.5.1. Impacts to the Snoqualmie River

(1) Move Mill Pond Road Farther from the Snoqualmie River/Buffer Impacts

Several comments stated requests to include an option to relocate Mill Pond Road farther landward than is currently proposed to improve riparian habitat along the right bank of the Snoqualmie River, and to include restoration of a part of the existing roadway footprint to native vegetation. Some comments cited recommendations from the Snoqualmie River temperature TMDL or WDFW guidelines as justification to a request to further increase riparian habitat to a minimum of 165 feet along the river, particularly where Mill Pond Road is currently closest to the river.

Response:

The general location of Mill Pond Road is constrained by access and connection points at the northwest and southeast ends in relation to adjoining properties and rights-of-way. The Proposal would relocate a portion of the road farther from the river to provide a roundabout access into Planning Area 1 of the project site. In this area, the existing roadbed would be decommissioned and planted with native trees and shrubs to enhance buffer functions along the river at the narrowest point of the existing functional buffer. Further relocation of the road away from the river is not feasible given constraints of wetland locations and road geometry. Please refer to Response 3.4.2 and to the Alternative discussion in Chapter 2 for additional information on constraints for road location.

Several comments cited the need for minimum buffer dimensions or additional forested buffer to protect the river and provide functions such as recruitment of large woody debris as the basis for further relocation of the road. However, current riparian buffer functions at its narrowest point along the river is already limited by the existing roadbed of Mill Pond Road. As noted in the Wetlands, Wildlife, and Fisheries Assessment (Draft EIS Appendix C), riparian vegetation in this area consists of a narrow band of native trees with both native and invasive shrubs. As currently proposed, the re-alignment of a portion of Mill Pond Road would widen the buffer somewhat in that area and provide additional enhancement of riparian function by decommissioning a segment of the existing roadbed and revegetating with native trees and shrubs over an area totaling approximately 1.7 acres. This would widen the functional buffer at its narrowest point from approximately 15 feet to 60–100 feet. In addition, the existing off-site forested area along the river adjacent to most of the project site south of the proposed stormwater outfall provides a functional buffer that is several hundred feet wide (400 to 700 feet). This area consists of well-developed coniferous and mixed coniferous and deciduous forest greater than 50 years old that currently provides a high level of riparian buffer functions, including a potential source of large woody debris.

(2) Snoqualmie River TMDL, Water Quality Impacts from Direct Discharge

Comments asserted that the Draft EIS has not adequately evaluated impacts to temperature of

the Snoqualmie River (including those related to canopy trees and vegetation) as a 303(d)-listed water body for temperature. The comments focused on the Draft EIS disclosure that there could be impacts to temperature. In addition, comments took issue with the Draft EIS stating that considering the low volumes of runoff compared with the river flow, probable impacts would be insignificant. The comments asserted that the Draft EIS lacked information and evaluations made in the 2011 TMDL report that the river is a temperature-impaired water body (Stohr et al. 2011). The reference documents on temperature TMDL in the Snoqualmie River indicate that water temperatures in the river often exceed levels that are harmful to salmonid fish, particularly at low-flow summer conditions and during periods of drought. Several comments expressed concern that stormwater runoff from developed portions of the site with a direct discharge to the Snoqualmie River would adversely affect water quality in the river, particularly with reference to water temperature impacts on salmonid fish, given that it is a 303(d)-listed water body for temperature. Some comments expressed a general concern about additional runoff to the river but did not provide further details, and others expressed concern about potential releases from winemaking operations. A comment questioned whether the Snoqualmie River is exempt from water quality controls. A comment stated that dogs should be kept out of water quality areas.

Response:

Based on a review of the reference documents on temperature TMDL in the Snoqualmie River (Stohr et al. 2011, King County 2016, Kubo 2017), stormwater discharges from the proposed development of Planning Area 1 on the project site are not expected to adversely affect river water temperatures. As noted in the Ecology TMDL report (Stohr et al. 2011), smaller discharges (those with flows less than 1% of the receiving water flow) are considered to have negligible impact on stream temperatures, and direct discharges into the mainstem and Middle Fork of the river are not large enough compared to flows in the river to raise water temperatures. A conservative analysis of modeled stormwater flows from the development in Planning Area 1 during the months of July and August compared to typical and worst-case and typical 7-day flows in the river showed that the flows from the site would be well under the 1% criterion for negligible temperature impacts in the river. Please refer to Response 3.4.2 for additional information about Snoqualmie River temperature and the TMDL.

Moreover, the referenced documents emphasize the importance of riparian vegetation and shading of the river and major forks for regulating water temperatures and recommend measures to improve riparian and river bank vegetation, in-stream channel complexity, and restoration of riparian vegetation along tributaries where it is lacking. The proposed PCI Plan for Snoqualmie Mill includes significant enhancement and restoration of degraded buffers along the wetlands and stream reaches on site.

Several comments expressed opinions that a higher standard of water quality treatment is needed to protect water quality in receiving waters, including the Snoqualmie River. Other comments called for infiltration of stormwater, instead of direct discharge, as a means to provide water quality treatment. As discussed in the Draft EIS Section 3.3.2 and Appendix A (Master Drainage Plan), the Snoqualmie River is designated as a “Basic Treatment Receiving

Water" by Ecology. This allows the project site to provide basic water quality treatment of stormwater runoff that will discharge directly to the river in a manner consistent with the Ecology and King County stormwater manuals. As discussed in the Draft EIS, all runoff from pollution-generating surfaces that would discharge to on-site wetlands or streams prior to flowing to the river would be routed through constructed stormwater wetlands, which would comply with Ecology and King County standards as enhanced treatment. Runoff from pollution-generating surfaces for direct discharge to the river would be routed through media filters or biofiltration swales to provide basic water quality treatment consistent with the stormwater manuals.

As discussed in the Draft EIS (Section 3.1 and Appendix B), infiltration facilities are not feasible because of the characteristics of on-site soils (much of which are compacted fill material) and existing groundwater conditions. Thus, no infiltration of stormwater is proposed on the project site.

Some comments questioned the validity of water quality samples gathered from on-site Streams 1 and 2 as representative, without sampling in other seasons and from more locations and questioned the reference to "poor" water quality in Stream 2. As discussed in the Wetlands, Wildlife, and Fisheries Assessment (Draft EIS Appendix C), the purpose of the sampling was not to characterize the overall quality of surface waters across the site in different seasons. Rather, the purpose was to see whether there was any indication of degradation of water quality as the streams pass through the site and to supplement observations in previous investigations (Cedarock Consultants, Inc. 2012) in evaluating general suitability as fish habitat. Descriptions of the on-site streams provided in the Wetlands, Wildlife, and Fisheries Assessment included summaries of information from the preliminary investigation by Cedarock Consultants, Inc. (2012). That investigation characterized fish habitat quality in Stream 2 as poor for potential summer rearing based on warm temperatures (including the observed 7-day average of daily maximum temperatures during August peaking in the lethal range for trout), low dissolved oxygen, low flow, shallow depths, poor habitat diversity, dense aquatic vegetation, and general poor water quality. The very fine-grained substrate would preclude spawning habitat. Potential winter rearing habitat was considered good based on protection from high winter flows. Although Stream 2 is accessible to fish from Borst Lake during most of the year, and warmwater fishes may be present, salmonid use was considered unlikely or only temporary.

A detailed plan for maintaining wetlands and other on-site resources would be developed following PCI Plan approval and prior to construction. As noted in Chapter 2 of the Draft EIS, the applicant will adopt Covenants, Conditions, and Restrictions (CC&Rs) that will specify the responsibilities of Snoqualmie Mill residents and businesses; these could include provisions for managing pets. In addition, the City's critical areas regulations include requirements that would guide and limit recreational access to on-site wetlands (SMC 19.12.170 H.7).

The concern about releases to the river is acknowledged. The potential of an inadvertent spill and release to the river from winemaking operations is discussed in Draft EIS Section 3.5, Environmental Health, along with applicable regulations and mitigation measures that would be

applied to contain any accidental spills (refer to pages 3-146 and 3-150, respectively).

3.5.2. Wetland Buffers, Hydrologic Analysis, and Jurisdictional Determination

(1) Wetland Buffers

Some comments asserted that the proposed wetland buffer averaging/reduction does not meet Ecology guidance or City of Snoqualmie critical areas regulations, with particular focus on the narrowest proposed buffer where constructed stormwater wetlands would be located. A comment requested more detailed information on the wetland buffer restoration plan. A comment stated that the wetland analysis did not discuss the history of the site or current uses. A comment stated that construction staging should not be permitted in wetlands.

Response:

As discussed in the Wetlands, Wildlife, and Fisheries Assessment (Draft EIS Appendix C), 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. The Proposal takes a broader, systemwide approach to wetland buffer 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. This flexibility is discretionary with the City Council. Overall, as documented in the Draft EIS, 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 report, 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 particular, Wetland 12, where much of the impact to degraded buffers would occur, is a ditched wetland system with limited habitat functions, bordered along much of its length by existing roads (i.e., the existing haul road) that will remain. In addition, buffers to be retained within the adjacent portion of Planning Area 3 will provide additional habitat contiguous with a larger open space area in the central portion of the project site.

The narrowest portions of the buffer on Wetland 12 would accommodate a constructed stormwater wetland facility to provide enhanced water quality treatment of stormwater runoff from developed surfaces and would be vegetated with native plants. In that way, the constructed stormwater wetland would provide functions normally provided by buffers (water quality protection and habitat), even though the constructed wetland was not technically counted as buffer enhancement in the analysis of the built condition. 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 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 approach to mitigation and approval of the PCI Plan.

It is acknowledged that Section 3.4 of the Draft EIS (Plants and Animals) does not discuss the history of the site; the analysis uses existing, not historic, wetland condition as the benchmark for identifying impacts. However, the site's geologic history is described in Draft EIS Section 3.1, Earth Resources, and Section 3.10, Historic and Cultural Resources, describes the history of human uses of the site. Existing uses of the Snoqualmie Mill site are authorized by the Pre-Annexation Agreement.

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.

(2) Wetland Hydrology

Some comments raised concerns about hydrologic impacts to wetlands from development in Planning Area 1 (with the conversion of undeveloped areas to impervious surfaces), and the ability to maintain surface and groundwater input to the wetlands to maintain hydrologic conditions within specified tolerances per Ecology's Western Washington Hydrologic Model. Other comments questioned the adequacy of mapping of hydrologic contributing basins for the wetlands and requested that all on-site wetland basins be mapped and analyzed for project impacts on wetland hydrology. A comment generally requested more detail on water quality in wetlands, including how the stormwater wetlands would be managed. A comment stated that the wetland along the haul road is stagnant.

Response:

The Master Drainage Plan (Draft EIS Appendix A) provides a comprehensive analysis and modeling of wetlands most likely affected by development of Planning Area 1: Wetland 12 (different segments modeled separately) and Wetland 28. This included mapping of pre- and post-development basins for these wetlands and applying the 2012 Western Washington Hydrologic Model (WWHM) to evaluate pre- and post-development wetland inflow volumes, per Guide Sheet 3B as required by Ecology in the stormwater manuals (within 20% of pre-development daily volumes and 15% of pre-development monthly volumes). As discussed in more detail in the Draft EIS (Appendix C), these criteria were met for all the wetlands modeled in Planning Area 1, showing that wetland hydrologic conditions would be maintained under the

Proposal, and no significant adverse impacts to wetland hydrology are expected.

As noted in Response 3.4.3, the evaluation of hydrology impacts in the Draft EIS properly applied the Guide Sheet 3B analysis of surface runoff, interflow, and groundwater to the wetlands in Planning Area 1 most likely impacted by its development. The only wetlands in Planning Area 1 that were not modeled for analysis were Wetland 11, which is north of the existing haul road and receives its hydrologic input from areas off site to the north and northeast, and Wetland 29, which is downstream of Wetland 28 (which was modeled for analysis). Regarding the analysis and modeling of other wetlands on site, particularly those in Planning Areas 2 and 3, no specific development plans currently exist for those areas, and it is therefore not possible to evaluate wetland impacts and mitigation in detail. However, it is assumed that the same approach to stormwater management proposed for Planning Area 1 would be applied in the other planning areas to maintain hydrologic conditions within the wetlands. It should be noted that Planning Areas 2 and 3 currently contain considerable areas of impervious surfaces from which runoff currently discharges to the wetlands in those areas. It is anticipated that the impervious area in Planning Areas 2 and 3 could be comparable to or potentially somewhat less than the current total impervious area. Consequently, applying a comparable approach to stormwater management to that applied in Planning Area 1 should enable maintenance of hydrologic conditions in the wetlands in Planning Areas 2 and 3. The Master Drainage Plan (Draft EIS Appendix A, Section 7) incorporates mitigation requirements from the King County Surface Water Design Manual that address wetland hydrology and water quality. The City would consider these and other appropriate measures to maintain proposed stormwater wetlands. The proposed PCI Plan would impact some degraded wetland buffers but would avoid any impacts to wetlands, including the wetland adjacent to the haul road. Subsequent detailed site planning for Planning Areas 2 and 3 would address the potential need to widen the existing haul road in some locations and would also address potential impacts to adjacent wetlands.

(3) Jurisdictional Determination of Wetlands

Some comments questioned whether the recently revised Waters of the U.S. (WOTUS) rule would affect the current Approved Jurisdictional Determination (JD) issued for the site by the US Army Corps of Engineers (Corps) in 2017. Other comments noted that the wetland delineation is becoming outdated, despite having been reviewed and approved by the Corps in 2015 to 2017.

Response:

The “Waters of the Unites States” (WOTUS) rules under the Clean Water Act (CWA) have been in flux for several years, in response to a series of administrative rule changes and court decisions. On November 18, 2021, the Environmental Protection Agency (EPA) and the Corps announced the beginning of a rule-making process to revise the definition of WOTUS yet again. In view of this ongoing change and uncertainty, it is not possible to provide a definite response to questions or comments regarding the future state and federal wetland jurisdiction and how that might affect wetlands on the Snoqualmie Mill site. The situation would be reevaluated

based on the rules that are in effect at the time of project permitting. The currently approved Jurisdictional Determination for the site is valid through 2022.

3.5.3. Wildlife Habitat

(1) Wildlife Habitat Impacts

Several comments expressed concern that impacts of construction and development on wildlife habitat, movement patterns, and corridors were not adequately discussed, including habitat for elk that currently utilize the site. Other comments noted that increased human and vehicle traffic would adversely impact habitat and the animals' ability to move through the area, or stated that proposed uses in the central open space were not compatible. A comment asked for more information and conceptual design for the culvert under Mill Pond Road to allow floodwaters to pass, which would be wildlife passable. Another comment questioned the feasibility of the wildlife crossing. Comments stated that wildlife impacts are not described in the Draft EIS, or not described in sufficient detail, and that no mitigation is proposed. A comment mentioned wildlife as a general concern but did not identify a specific concern.

Response:

Draft EIS Section 3.4 and Appendix C include a comprehensive discussion of current site conditions; potential impacts to wildlife, habitat, fisheries, and wetlands; and mitigation measures to address identified impacts. As discussed in the Wetlands, Wildlife, and Fisheries Assessment (Draft EIS Appendix C), development of Planning Area 1 would convert approximately 35% of the site to buildings, impervious surfaces, associated urban facilities, and landscaping, causing a loss of existing young forest, shrub, and herbaceous upland habitat. As discussed in the Master Drainage Plan (Draft EIS Appendix A), nearly all of the impervious surfaces to be developed in Planning Area 1 would be considered "new" impervious surfaces. Areas to be developed in the later phases of the PCI Plan (Planning Areas 2 and 3) would impact existing, more highly disturbed areas on site such as fill pads, buildings, gravel and paved roads, and some weedy herbaceous and shrub-dominated areas. Development of the site would increase fragmentation of existing habitat on site, particularly in Planning Area 1. This would eliminate habitat for a variety of wildlife species, including areas in the western portion of the site used by elk for foraging and resting cover (refer to Draft EIS Appendix C, Section 5.2.2 for further discussion).

As identified in the Draft EIS (Appendix C), this would reduce the local populations of a variety of species that currently use existing habitats and displace some animals to adjoining sites. Conversion of portions of the site from existing vegetation to urban uses with human activity would disturb activity and movement patterns of wildlife on the site, and those impacts would increase incrementally with each phase of development. However, as discussed in the Draft EIS (Appendix C), animal activity on the site is currently influenced by existing activities, particularly DirtFish rally car activities, truck traffic on the haul road, and pickup and delivery of materials on site. Thus, the site can hardly be considered "large and quiet" even under current conditions, particularly during daytime activities, as some comments asserted.

During construction of Planning Area 1, disturbance of retained habitat and animal activities and movements on site would be most intense, with continued rally car activities on site 6 days a week, which extend from Planning Area 2 well into Planning Area 3. During and after completion of Planning Area 1, and until development of the other phases, it is assumed that the DirtFish Rally School activities would continue. In particular, as discussed in the Draft EIS, elk use of the site during daytime hours of activity would be restricted to relatively small areas of retained open space within Planning Area 1 and adjacent to Borst Lake, and the elk may no longer find adequate refuge habitat on site during daytime hours of heavy activity. Elk would continue to use the forested habitat adjacent to the site, between the Snoqualmie River and Mill Pond Road. Elk would be expected to continue to use portions of the site occupied by existing uses during periods of lower human activity (e.g., overnight). However, with less habitat available, some animals may be displaced from the site. Increased human and vehicular traffic after development would further hinder animal movements across roads in the area and increase the likelihood of vehicle and animal conflicts.

As discussed in the Draft EIS, upon development of Planning Area 2, the DirtFish Rally School activities would be reduced or relocated, reducing noise on site and enabling provision of compensatory flood storage and restoration of some habitats in the central open space corridor. As described in the mitigation measures in Draft EIS Section 3.4, wetland and stream buffers in this area would be enhanced with plantings of native trees, shrubs, and herbs; invasive species would be removed. Along with the buffer areas enhanced and restored in Planning Area 1, these plantings would, over time, enhance the habitat value of this part of the site for a variety of species, including elk, and would be contiguous with retained open space habitat within Planning Area 1, as well as Borst Lake to the south. Restoration plans for this area could include revegetating existing compacted surfaces used by DirtFish and may include provision of habitat elements such as downed logs, snags, and rock piles. The restoration plantings and habitat elements would provide vegetative screening of the critical areas, as well as vegetative cover for breeding, foraging, and refugia for birds, small to medium-sized mammals, and reptiles and amphibians. Additional mitigation elements to reduce human-wildlife conflicts could include elk crossing signs along the roads to warn drivers of elk or deer that may cross the roads at any time. Comments stating that the uses planned for the open space are not compatible with wildlife use are acknowledged but are not believed to be accurate.

It is acknowledged that enhancement plans for wildlife habitat in Planning Areas 2 and 3 are conceptual in nature, which reflects the lack of detailed site planning for this portion of the site at the present time. Mitigation measures for potential wildlife impacts from the use or development of those planning areas are still conceptual as well but indicate the direction of possible mitigation. As noted frequently in the Draft EIS, and in responses to comments in this Final EIS (see Response 3.1.2 (2)), the City is following a course of phased environmental review for the Snoqualmie Mill PCI Plan. Wildlife concerns will be re-evaluated and specified in greater detail when site planning for Planning Areas 2 and 3 is more advanced and when impacts and mitigation measures can be identified with greater specificity. As noted in Section 6.4 of Draft EIS Appendix C, more specific enhancement plans for the central corridor would also be

developed for review along with development plans and environmental analyses for Planning Areas 2 and 3.

There is currently no specific guidance by WDFW for the design of terrestrial underpasses or culverts to allow wildlife crossings under roads. Other biologists have reviewed structures for animal crossings as part of studies of animal crossings of highways and conflicts with traffic (Huijser et al. 2018). It is anticipated that the culvert would be designed as a bottomless arch culvert. Further, as noted in the Draft EIS, it would be designed to allow passage for small to medium-sized mammals and amphibians, so would likely be in the range of 6 to 8 feet wide and 4 to 5 feet tall.

Comments mentioning impacts to wildlife as a general concern did not provide information specific enough to enable a substantive response but are acknowledged.

(2) Miscellaneous Comments about Wildlife, Habitat, and Critical Areas

A comment stated that the Snoqualmie Mill site cannot be accessed without impacting critical areas. A comment stated that King County maps show additional critical areas on the site. A comment identified a "regional conservation system," comprised of Mount Si, farms, and parks, and requested that it be described. A comment stated that impacts to "sensitive receptors" should be considered.

Response:

It is acknowledged, and stated in the Draft EIS, that almost the entire Snoqualmie Mill site is located in the floodplain (Draft EIS Section 3.3); site access is also unavoidably located within the floodplain. Other critical areas are present on the site as well, including geologic hazards (Section 3.1), as well as wetlands, streams, and wildlife habitat (Draft EIS Section 3.4). The Draft EIS describes if and how these resources would be impacted by the PCI Plan, and how impacts can be avoided or otherwise mitigated.

The Snoqualmie Mill site is within the jurisdiction of the City of Snoqualmie, and the City's maps and critical areas regulations are the basis for defining and identifying critical areas and regulating development appropriately.

The presence of a river, mountains, farms, parks, and trails within and/or adjacent to the City of Snoqualmie, and the City's location at the edge of the County's urban area, is acknowledged and is described in several sections of the Draft EIS; see, for example, Section 3.6 (Land and Shoreline Use), Section 3.9 (Aesthetics, Light, and Glare), and Section 3.13 (Parks). Similarly, potential impacts of the proposed PCI Plan to these elements of the environment are described in the Draft EIS. But whether and how these resources comprise or can be evaluated as a "conservation system" is not suggested in the comment and cannot be determined.

A comment regarding impacts to "sensitive receptors" is not clear and cannot be responded to without more information. It could be referring to sensitive/critical areas designated by the City, which are evaluated in several sections of the Draft EIS (e.g., Section 3.1 [Earth Resources] and Section 3.4 [Plants and Animals]), or it could refer to other resources that the commenter

personally considers to be sensitive in some manner. The comment is acknowledged. A comment regarding the potential for dogs to disturb or foul water resources is acknowledged.

3.5.4. Fisheries

(1) Bull Trout

A comment asserted that additional data are needed to support the contention that bull trout do not occur in the Snoqualmie River system above the Falls.

Response:

As noted in Draft EIS Appendix C, extensive instream surveys for bull trout have failed to detect its presence anywhere in the three forks of the Snoqualmie River above the Falls (Berge and Mavros 2001). These were comprehensive investigations of all suitable habitats specifically designed to search for bull trout in the three forks area, and none were found. It is acknowledged that it is difficult to find a relatively rare fish that often occurs in very low densities. Further, despite these extensive surveys of the three forks of the Snoqualmie River, it is possible that bull trout could be present somewhere in the upper basin. However, we do not consider it necessary to conduct additional studies to determine whether bull trout are present above Snoqualmie Falls to evaluate impacts of this project on this species, for several reasons. First, the revised US Fish and Wildlife Service (USFWS)-designated critical habitat for bull trout (Federal Register 2010), which is considered essential for the conservation of the species, does not extend above Snoqualmie Falls. Second, even if bull trout were to occur in the three forks area above the Falls, suitable habitat would likely be located well upstream of the project site in the forks and tributaries where water temperatures during the late summer and fall are cooler. As discussed in the Draft EIS (Appendix C), bull trout are typically found in high, glacially fed watersheds or near cold, perennial streams; preferred spawning habitat consists of low-gradient streams with loose, clean gravel and water temperatures of 5°C to 9°C in the late summer or early fall. No such conditions are found on the Snoqualmie Mill site, and thus the site does not contain suitable habitat for bull trout. In addition, development of the project site would not adversely affect water temperatures in the river (see Response 3.5.1(2) above regarding TMDL), especially upstream of the site. The SEPA Rules recognize that complete information relating to a particular environmental concern may be lacking and/or unavailable in specific situations (WAC 197-11-080). The Rules authorize agencies to disclose gaps in knowledge or scientific uncertainty, and to proceed in the absence of perfect information. The costs to perform additional studies in this instance, to demonstrate or confirm the absence of a species that available data and studies indicate is not present, would be exorbitant and unreasonable to impose on an individual applicant.

3.6. ENVIRONMENTAL HEALTH – SITE CONTAMINATION & CLEANUP

3.6.1. Cleanup Process

Comments pertained to general concerns regarding the size and complexity of the site, the need for comprehensive environmental investigations, and potential future cleanup liability. One comment noted the need for a feasibility study for the site for those areas where hazardous substances in site media are found to exceed cleanup levels under the Washington State Model Toxics Control Act, Chapter 70A.305 RCW (MTCA). Several comments generally stated that environmental compliance for the entire site is needed now and that phased analysis of Planning Areas 2 and 3 should not be deferred. Comments stated that more discussion of the impacts and risks of legacy contamination is needed, and that the environmental health risks of each chemical/substance present and the risk of release should be identified in the EIS. Comments also stated that a cleanup plan is needed and should be completed or fully scoped before any development occurs. Comments emphasized or questioned the presence of specific contaminants, including asbestos.

Response:

The intent of the proposed project is to develop each planning area of the Snoqualmie Mill PCI Plan consistent with the requirements of MTCA and with oversight by the Washington State Department of Ecology (Ecology).

The City's approved Post Annexation Implementation Plan (AIP) for the Snoqualmie Mill Proposal acknowledges a phased approach to remediation, stating that environmental remediation must be completed prior to development of each stage (refer to Draft EIS Section 3.7, Consistency with Plans and Policies, page 3-180). Under MTCA, sites are almost always investigated and cleaned up in phases, and remediation of brownfield properties, like the Snoqualmie Mill property, often occurs in conjunction with redevelopment, when financial resources are more readily available.

A "site" under MTCA is defined as a place where hazardous substances have come to be located. A given property can include multiple sites, each of which can relate to a separate source or area of contamination. A "site" generally does not include areas of a property where hazardous substances exist at concentrations below MTCA cleanup levels. Currently available data indicate that Planning Areas 2 and 3 contain discrete, separate areas of legacy contamination associated with the former Weyerhaeuser mill; no such areas have been identified in Planning Area 1.

In August 2021, Ecology conducted a Site Hazard Assessment of the Snoqualmie Mill property. A Site Hazard Assessment is a standard part of Ecology's regulatory process under MTCA. The general 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 of 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, but reaffirms that the cleanup

site will be addressed through Ecology's regulatory process under MTCA irrespective of the applicant's development plans. Future assessments will determine what further action is warranted.

The Site Hazard Assessment also provides a framework for initial discussions between the applicant/property owner and Ecology regarding the number and type of sites at the Snoqualmie Mill property, the scope of the investigations to be performed at the Snoqualmie Mill property to fill any data gaps, and the regulatory mechanism for Ecology oversight (i.e., through the Voluntary Cleanup Program or an agreed order).

Farallon Consulting, L.L.C. (Farallon) conducted subsurface investigation activities in 2020 and 2021 that included installation of test pits, borings, and monitoring wells across Planning Area 1. The results of the investigation are summarized in Appendix B of the Final EIS. The objectives of the investigation were to assess whether Planning Area 1 has been impacted by historical fill material or by releases of contaminants from historical activities conducted at the Snoqualmie Mill property. The scope of work was also intended to address comments received from Ecology and others on the Draft EIS pertaining to the characterization of environmental conditions in Planning Area 1. The only contaminants detected in Planning Area 1 at concentrations exceeding MTCA Method A cleanup levels were arsenic, and total petroleum hydrocarbons as gasoline-range organics (GRO), as diesel-range organics (DRO), and as oil-range organics (ORO). However, the findings of the investigation determined that the elevated arsenic concentrations in soil likely reflect naturally occurring background conditions on the Snoqualmie Mill property, and the elevated arsenic concentrations in groundwater are either attributed to naturally occurring conditions or are associated with an upgradient source off the Snoqualmie Mill property. Similarly, the data indicated that the elevated concentrations of DRO and ORO are predominantly due to naturally occurring biogenic material (i.e., organic material derived from plants), and not a release of petroleum hydrocarbons. Based on laboratory data, the single detection of GRO above the cleanup level is attributable to naturally occurring terpenes produced from plant material, rather than to a petroleum hydrocarbon release. This finding was supported by olfactory evidence that the soil had a turpentine-like odor.

Investigation and cleanup of the legacy contamination at the Snoqualmie Mill property will be conducted following MTCA requirements with oversight by Ecology. The first step will be to complete a Remedial Investigation of each site to define the extent and magnitude of the contamination and to identify the constituents of concern, media of concern, potential exposure pathways, and potential human and ecological receptors. Ecology will require a terrestrial ecological evaluation as part of the Remedial Investigation process to address potential impacts on native plants, soil biota, and wildlife.

Once the nature and extent of contamination is characterized and each site is defined, a Feasibility Study will be prepared in accordance with MTCA to evaluate and compare feasible cleanup action alternatives. Cleanup plans will be reviewed and approved by Ecology prior to implementation of any cleanup actions. The responsibility for completion of cleanup to the satisfaction of and approval by Ecology will remain with the potentially liable parties in accordance with MTCA.

A comment questioned actions regarding asbestos. Asbestos is not subject to MTCA standards. If present on site, asbestos would be abated when existing buildings are demolished.

3.6.2 Current Conditions at Planning Area 1

Comments pertained to the lack or insufficiency of environmental data collected at Planning Area 1 and the potential migration of contamination from Planning Areas 2 and 3 to Planning Area 1. Several comments speculated as to suspected contaminants in Planning Area 1, including the possible use of boiler ash as fill material in Planning Area 1 and the possible use of wood preservatives on whole logs stored in Planning Area 1. A comment noted that Planning Area 1 is in a floodplain that has had many floods and infers that the floods could have spread contamination. The same comment further noted that chemicals could have been released from a fire that destroyed the plywood plant adjacent to Planning Area 1 in 1989.

Response:

Farallon conducted a subsurface investigation in Planning Area 1 in 2020 and 2021, which included the collection and analysis of soil and groundwater samples. The results are summarized in Appendix B of the Final EIS. The purpose of the investigation was to assess whether Planning Area 1 has been impacted by historical fill material or by releases of contaminants from historical activities conducted in Planning Areas 1, 2, or 3. The findings of the investigation determined that only arsenic, GRO, as DRO, and ORO were found exceeding MTCA cleanup levels. However, analysis of the results indicated 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.

Regarding the comment about boiler fill ash, no ash material or boiler ash fill was encountered in the test pits or borings advanced in the investigation, and no ash material or boiler ash fill was encountered in the geotechnical test pits excavated in Planning Area 1 in 2012 by Associated Earth Sciences, Inc.

Regarding the comment about wood preservatives, the only historical activity of consequence conducted on Planning Area 1 was the storage of raw logs. Processing of logs was likely limited to trimming and debarking in Planning Area 3 and sorting and storage in Planning Area 1 pending shipment for export. Treating whole logs with preservatives for export was not a common practice at sawmills, and there is no record of any wood treatment operations in Planning Area 1. Two pentachlorophenol dip tanks formerly located in Planning Area 3 were reportedly used to treat cut lumber. Pentachlorophenol is the only preservative known to have been used in the dip tanks. During the subsurface investigation activities conducted in Planning Area 1 in 2020 and 2021, soil and groundwater samples were analyzed for polycyclic aromatic hydrocarbons (PAHs) and semivolatile organic compounds (SVOCs), including pentachlorophenol, which would be indicative of wood treatment compounds. No PAHs or SVOCs were detected at concentrations exceeding MTCA cleanup levels.

Regarding the comment about the potential spread of contaminants in floods, the results of the

subsurface investigation conducted in 2020 and 2021 in Planning Area 1 did not find any elevated concentrations of hazardous substances that could not be attributed to naturally occurring background conditions or that did not appear to be predominantly biogenic in origin.

Regarding the comment about potential release of chemicals from the 1989 fire at the former plywood plant, the subsurface investigation activities conducted in 2020 and 2021 in Planning Area 1 did not find evidence of contamination attributable to the plywood plant. Soil and groundwater samples collected near the plywood plant were analyzed for PAHs that could have been generated from combustion of the plywood plant and phenolic SVOC compounds that may have been used in adhesives in the production of the plywood. No PAHs or phenolic compounds were detected in the samples.

3.6.3 Proximity of City of Snoqualmie's North Wellfield

Comments noted that the City of Snoqualmie's drinking water wellfield is located 1,000 feet north of Planning Area 1, but the Draft EIS indicates that no public water supply wells were identified proximate to Planning Area 1 and does not mention or provide analysis of potential impacts on the City's water supply.

Response:

The City of Snoqualmie's North Wellfield is located approximately 1,000 feet north of Planning Area 1. The upper saturated zone at the Snoqualmie Mill property is underlain by a thick sequence (greater than 150 feet) of lacustrine silt and clay that limits any potential downward migration of contaminants in groundwater. The groundwater flow direction in the shallow upper saturated zone at the Snoqualmie Mill property has been documented to the southeast or southwest, away from the North Wellfield. The North Wellfield production wells are screened at depths ranging from 558 to 710 feet below ground surface (bgs), whereas the legacy contamination in Planning Areas 2 and 3 was detected at depths less than 20 feet bgs, and the constituents detected in Planning Area 1 during the subsurface investigation activities were at depths of 15 feet bgs or less. The results of the subsurface investigation are summarized in Final EIS Section 3.6.2 and Appendix B. Further, groundwater produced from the North Wellfield is treated for arsenic in addition to iron and manganese, due to naturally occurring background concentrations of these constituents in the Deep Aquifer in which the wells are screened.

3.6.4 Characterization and Cleanup of Planning Areas 1, 2, and 3

Comments pertained to the need for a monitoring network prior to development activities; impacts of groundwater on surface water quality in the Snoqualmie River; interaction of groundwater and surface water in Borst Lake; decommissioning of inoperable monitoring wells; and potential contamination along railways, roadways, and stormwater ditch sediments. There were also comments and questions regarding the sufficiency of past investigations and cleanups in known areas of contamination in Planning Areas 2 and 3 and the need for additional characterization work. One comment expressed concern regarding a number of alleged past

waste disposal activities such as burying coal ash and soil contaminated with transmission oil and the use of dredged material from Borst Lake and contaminated sawdust for construction of berms in unknown locations. A comment questioned the presence of asbestos.

Response:

A report summarizing the scope of work, methods, and findings of the 2020 and 2021 subsurface investigation activities in Planning Area 1 is in preparation. A summary of the investigation activities and findings are presented in Section 3.6.2 of the Final EIS. Following review of the subsurface investigation report and completion of the Site Hazard Assessment, discussion between the applicant/property owner and Ecology will be undertaken to determine what additional information Ecology may require, if any, for any further characterization of Planning Area 1.

The Draft EIS acknowledges in Section 3.5 and Appendix D-2 that much of the past investigation and cleanup work in Planning Areas 2 and 3 was not performed under Ecology oversight, and that additional work will be required in these (and possibly other) areas of Planning Areas 2 and 3, prior to construction, as the phased development and cleanup activities progress. Details on the overall remediation strategy are provided in Draft EIS Section 3.5, Environmental Health. In summary, the scope of investigations to characterize the nature and extent of potential contamination in Planning Areas 2 and 3 will be developed following the requirements of MTCA with oversight by Ecology. Work plans will be provided to Ecology for review and approval prior to initiation of field investigation and cleanup activities. The cleanup process is described above in Final EIS Section 3.6.1.

Ecology will require sufficient characterization of the nature and extent of contamination in Planning Areas 2 and 3 prior to approving cleanup actions. The contaminants of concern, media of concern, potential exposure pathways, and potential human and ecological receptors will be identified and assessed, as appropriate, as part of the investigation and cleanup process. Environmental investigations are commonly conducted in iterative phases as more data and information become available, and data gaps are identified and addressed following completion of each phase of work.

Regarding alleged past waste or contaminated media disposal activities, the commenter did not provide any facts supported by references or sources to which to respond. As explained in the Draft EIS and Final EIS, the investigation and remediation of hazardous substances will be addressed under MTCA with oversight from Ecology and based on existing data and historical land uses at the site. Asbestos is not subject to MTCA standards and would be abated in conjunction with the demolition of existing buildings.

3.6.5 Safety Measures

Comments pertained to worker training and health and safety requirements for investigation and cleanup of contaminated sites, as well as the potential liability for cleanup of contamination should construction proceed without proper measures to protect human health and the environment.

Response:

If hazardous substances are encountered at concentrations exceeding applicable cleanup levels prior to or during the development of the Snoqualmie Mill property, measures will be implemented to protect human health and the environment during site investigation and cleanup activities in accordance with MTCA requirements and Ecology oversight. Safety measures will be in accordance with applicable Washington State and federal requirements for worker training and health and safety requirements for hazardous waste operations. Cleanup actions will be conducted consistent with MTCA requirements and oversight by Ecology, which will ensure that any remedial actions follow regulatory requirements for the protection of human health and the environment.

3.6.6 Filling and Grading and Potential Contaminated Soil Volumes

The comment pertained to balancing cuts and fills for grading purposes and potential soil volumes that may require remediation in Planning Areas 2 and 3. The comment also noted that the implications of the costs and benefits of remedial actions in Planning Areas 2 and 3 are disconnected in the Draft EIS from the discussion of the benefits of development in Planning Area 1.

Response:

Until a Remedial Investigation and Feasibility Study is completed consistent with MTCA, it is premature to estimate the volume of soil that may require off-site disposal. It is highly unlikely that the volume of soil requiring disposal at an off-site landfill could exceed landfill capacity in the region. The majority of the documented soil contamination is petroleum hydrocarbons, and there are multiple landfill facilities in the region that routinely accept petroleum-contaminated soil from cleanup sites in King County. Although on-site treatment of soil may be considered as part of the Feasibility Study, it is typically not a cost-effective cleanup alternative for soil at most sites.

Regarding the comment on implications of the costs and benefits of remedial actions in Planning Areas 2 and 3, the Draft EIS acknowledges that the cleanup costs for Planning Areas 2 and 3 are unknown at this point and will be developed as part of the cleanup process and specific development proposals.

3.6.7 Borst Lake

Comments pertained to the omission of Borst Lake from consideration in the Draft EIS and the desire for data on toxins in fish and other aquatic organisms and plants in Borst Lake and in lake sediments. One comment questioned Borst Lake's impact on groundwater beneath Planning Area 1 and the impact of groundwater beneath the Snoqualmie Mill property on Borst Lake.

Response:

Borst Lake is not owned by the applicant and is not part of the project area that is the subject of the EIS. However, if the Remedial Investigations find that hazardous substances in Planning

Area 3 are entering Borst Lake at concentrations exceeding applicable cleanup levels, or if any hazardous substances are travelling from Borst Lake to the site, then the soil or groundwater will be further investigated and remediated, as necessary, in compliance with MTCA and any approved cleanup plan.

3.7. LAND USE

Comments stated that the Proposal is not a fully contained community, and it creates a potential for sprawl in the surrounding communities. Other comments stated that the EIS does not consider impacts to all off-site properties. A comment stated that the cumulative impacts of pipeline projects are not considered. Another comment stated that any increase in population is significant and that housing will not be affordable.

Response:

The PCI Plan is a commercial/industrial master plan that contains some mixed-uses (residential and retail) in one area and in one building. The Proposal is intended to implement the City's land use and zoning designations for the Mill Planning Area, as set forth in the Comprehensive Plan. It would function as an employment center, and not as a self-contained community that meets the everyday needs of its residents. It is also not intended to be a "fully contained community," which is a specific term and type of development defined in the Growth Management Act (RCW 36.70A.350). While the Proposal does include some multi-family housing units, the housing is proposed to be market rate.

The Draft EIS Land Use discussion in Section 3.6 evaluates the site and proposed development in the context of existing and planned land uses and development patterns, considering existing City of Snoqualmie and King County land use designations. It is acknowledged that the EIS evaluates impacts and relationships to the types and patterns of land use; it does not, cannot, and is not required to discuss individual properties.

The Draft EIS analysis does include planned growth, pipeline projects, and cumulative impacts in its analysis of each element of the environment where cumulative population growth is relevant. Please refer, for example, to the discussion of Population, Housing, and Employment (Draft EIS pages 3-195/3-196), Transportation (page 3-265), and Public Services (page 3-381).

The statement in a comment that "any increase in population is significant" is acknowledged as the opinion of the commenter, but it may be based on a misinterpretation of the discussion in Draft EIS Section 3.8 (Population, Housing, and Employment). The EIS states that population growth *in itself* (emphasis added) is not *per se* a significant or adverse impact. As the discussion indicates, significance depends on how the growing jurisdiction plans for and manages that growth, for example, by planning for adequate infrastructure and services.

3.8. CONSISTENCY WITH PLANS, POLICIES, REGULATIONS, & AGREEMENTS

A number of comments generally identified perceived inconsistencies with policies or statements in the Snoqualmie Comprehensive Plan, including the Vision Statement, Goal 6, and four individual policies related to historic resources, wastewater treatment plant capacity, and removal of unpermitted fill. For example, a comment identified an inconsistency with one of eight bulleted statements in the Comprehensive Plan's Vision Statement defining multiple components of a "distinctive sense of place" (page 1-3), and with Goal 6 (page 1-18), both of which focus on protecting of wetlands, streams, wildlife, and natural areas. Other comments asserted inconsistencies with historic resources policy 5.2.7, including that proposed mitigation is insufficient; and with Land Use & Infrastructure policy 3.2.7 maintaining sufficient supply and wastewater treatment plant capacity. Additional policy inconsistencies mentioned in one comment letter include the following (policies abbreviated):

Policy 3.2.1 - Provide zoned land to support target industries.

Policy 3.3.4 - Limit uses with lower wage jobs and/or minimal tax revenue in the Mill Planning Area, including warehousing.

Policies 4.2.1/4.3.4 - Encourage affordable housing.

Objective 6.5 - Reduce risks from floods and geologic hazards.

Policy 7.4.1 - Allow housing types that match jobs in the city.

Policy 8.1.3 - Concurrency policy for transportation projects.

Policy 9.1.2 - Capital facilities and services must meet level of service (LOS) standards.

Policy 9.1.3 - Fair share of costs for capital improvements.

Policy 8.4.1 - Provide bike and pedestrian paths.

Policy 7.8.9, Table 1.3 (AIP) - Preserve the flood storage and conveyance function of floodway.

Neighborhood Profile E.9 - Encourage access to Mill Pond water and development of public uses.

Some comments stated that the Proposal is inconsistent with the Snoqualmie Comprehensive Plan policy requiring the removal of unpermitted fill in the floodplain. A comment noted that the Proposal is located in the floodplain.

Additional comments stated that the City has not updated its Shoreline Master Program (SMP) and the Draft EIS relies on the Draft SMP, making it impossible to determine if the Proposal will comply. A related comment stated that more detailed analysis of the SMP was needed.

A comment stated that the Comprehensive Plan requires cleanup sufficient for the intended use and encourages assessment of the Mill Pond. A comment noted that permits from the Department of Ecology (Ecology) and Department of Health (DOH) are required for wineries.

A comment stated that development work has occurred on site, which violates the Pre-Annexation Agreement.

At a broader, regional scale, some comments questioned consistency of the Proposal with the Growth Management Act (GMA) and the Countywide Planning Policies (CPPs). A comment stated that the Proposal was not consistent with "King County's growth plan" but did not identify which King County plan was being referenced. A comment stated that inconsistency with Comprehensive Plan policies identified in the comment thereby violates the GMA. Another comment suggested that the Snoqualmie Mill PCI Plan EIS had to compensate somehow for the fact that previous regional environmental documents had not evaluated commercial/industrial use of the property.

A comment also questioned the consistency of the Proposal with the 2012 City of Snoqualmie-King County Interlocal Agreement regarding annexation of the Mill Planning Area.

The foregoing comments are addressed in turn below.

3.8.1. Consistency with Snoqualmie Comprehensive Plan

Response:

Section 3.7 of the Draft EIS discusses the consistency of the Proposal with the City of Snoqualmie Comprehensive Plan. The discussion is of necessity selective, focuses on policies that are relevant to development, and omits policies that provide directions to the City for actions or future planning. Section 3.7 of the Draft EIS evaluates 38 policies relating to the Comprehensive Plan's overall Vision, and Plan elements covering Economic Development, Housing, Community Character, Environment, Land Use, Transportation, Capital Facilities & Utilities. The Draft EIS concludes that the proposed PCI Plan is generally consistent with the policies discussed. Through issuance of the Final EIS, the City reaffirms that conclusion. The following responses are organized according to the aforementioned elements of the Comprehensive Plan that are raised in comments.

(1) Vision

The asserted inconsistency with the Vision Statement and Goal 6 is based on a comment's stated conclusion that the Proposal would not accomplish these objectives because it is an industrial project located on a site with numerous wetlands and other environmental features. The redevelopment of a historically industrial site also containing wetlands for renewed industrial use is not *per se* inconsistent with the cited policies. As identified in the Draft EIS, the Proposal would maintain two-thirds of the overall site as open space, habitat, and area for flood storage, and would not directly impact or result in significant impacts to any wetlands themselves. Impacts to wetland *buffers* would be mitigated and degraded buffers would be enhanced. Looking at the larger context, the Snoqualmie Mill site was annexed to the City and specifically planned and zoned for commercial and industrial activities; the proposed uses are consistent with this designation. In addition, it is noted that other specified components of the Snoqualmie 2032 Vision include a healthy diverse economy, and livable/complete communities,

that include mixed-use centers and employment opportunities.

(2) Land Use & Infrastructure

The assertions of inconsistencies with Land Use & Infrastructure (policy 3.2.7) are inaccurate. These policies provide direction to the City to maintain sufficient supply and wastewater capacity so that the City can accommodate the desired economic development for the Mill site. Preliminary information from the City's Water System Plan update indicates that sufficient water supply exists to serve Snoqualmie Mill. Regarding WWTP capacity for Biological Oxygen Demand (BOD), the Draft EIS discussed the potential to provide an on-site pre-treatment facility to reduce BOD impacts for winery production as an alternative to upgrading the WWTP. Based on preliminary information from the City's Wastewater System Plan update, the City would prefer to upgrade the WWTP's BOD capacity with participation from the applicant. To the extent that additional water and wastewater treatment capacity is needed, Policy 3.2.7 calls for the City to provide it.

(3) Historic Resources

The asserted inconsistency with historic resources policy 5.2.7 is also inaccurate. The policy directs the City to "work with property owners and developers" to accomplish historic preservation. The process of "working with" the City (and tribes, agencies, and organizations) to accomplish historic preservation is ongoing; the City will "work with" the property owner in the context of the Final EIS, execution of a development agreement, public hearings and City deliberations, and conditions of approval to the PCI Plan. This process, discussions, and deliberations, not the EIS alone, will determine how the site's historic resources will be preserved. The comment that the applicant's proposal to preserve and reuse two historic buildings is not substantial or sufficient is a statement of the commenter's personal opinion and is acknowledged. The sufficiency of the proposed preservation and reuse of existing buildings will be considered as part of the process of accomplishing historic preservation with the City.

(4) Individual Policies

The numbered Comprehensive Plan policies identified in the comment are discussed in Draft EIS Section 3.7. Disagreement with those conclusions of consistency expressed in some comments is acknowledged. The Draft EIS analysis and conclusions of consistency have been reviewed and are reaffirmed in response to those comments. Regarding housing, it is acknowledged, and is stated in Draft EIS Chapter 2 and Section 3.8, Population, Housing, & Employment, that the proposed multi-family rental units would be market rate and would not be affordable to lower income families.

(5) Shoreline Master Program (SMP)

The City adopted Ordinance No. 1217 on August 26, 2019. Ordinance No. 1217 adopted an updated SMP that was substantially the same as the draft SMP that is the basis for the consistency analysis in the Draft EIS. Ecology granted conditional approval of the SMP update, subject to certain specific required and recommended changes, on June 21, 2021. The City

Council adopted Ordinance No. 1252, repealing Ordinance No. 1217 and adopting the SMP update anew along with Ecology's recommended and required changes. The City conveyed its acceptance of Ecology's changes by letter on August 10, 2021. The SMP as modified in Ordinance No. 1252 is substantially the same as the draft SMP that formed the basis for the consistency analysis in the Draft EIS. On August 17, 2021, Ecology conveyed its final acceptance of the SMP to the City, establishing 14 days after the date of the letter – August 31, 2021 – as the SMP's effective date. On September 3, 2021, Ecology published the required legal notice, which triggered a 60-day appeal period that expired on November 2. No appeal was filed with the Growth Management Hearings Board, which means that the SMP as adopted in Ordinance No. 1252 and approved by Ecology on August 17 is final.

Draft EIS Section 3.7.5 (page 3-186) evaluates the Proposal's consistency with SMP shoreline environment designations and permitted uses and concludes they would be consistent; those conclusions are reaffirmed, and are not affected by Ecology's recommended and required changes that the City adopted in Ordinance No. 1252. The actual effect of the updated SMP on the Proposal will be evaluated when a Shoreline Substantial Development Permit application is submitted for the actual physical development of the PCI Plan project. PCI Plan approval alone would not result in any development, either in the shoreline or uplands. The City will review the Proposal's consistency with shoreline requirements at the time that an application for a Shoreline Substantial Development Permit is submitted, which cannot occur until the PCI Plan has been reviewed and approved. Therefore, it can be assumed that any development will be required to comply with the SMP in effect when an application is submitted.

(6) Site Remediation

The Proposal would remediate affected portions of the property, consistent with Model Toxics Control Act (MTCA) cleanup standards, in phases as development occurs. The Mill Pond (Borst Lake) is not part of the Snoqualmie Mill PCI Plan Proposal and is not owned by the applicant; any assessment and proposed use of the pond would be determined between the City and the owner of that property, Weyerhaeuser.

(7) Winery Permits

The comments regarding winery-related permits are acknowledged; all applicable permits related to winery operations will be obtained. The Draft EIS Fact Sheet identifies a winery general permit from Ecology and a DOH permit. The comment asserting improper on-site development activity does not relate to the EIS or the Proposal being reviewed in the EIS but is noted.

(8) Illegal Fill/Berm

The comment that the Proposal is inconsistent with the City of Snoqualmie Comprehensive Plan policy requiring removal of unpermitted fill in the floodplain is inaccurate. *Snoqualmie 2032* does not contain a policy requiring the removal of unpermitted fill; such reference may have been to a prior Comprehensive Plan policy that is no longer in effect. The currently adopted Comprehensive Plan's narrative does identify the presence of previously constructed berms and unpermitted fill on the Snoqualmie Mill site as potential contributors to flooding (e.g., Vision

and Policy Plan Table 1.3), but this is not a policy. Similarly, a side bar in the Plan summarizes the City's efforts over time to require that the fill be removed (Land Use Appendix, p. 7-13), but this is not a policy. Neither the Comprehensive Plan, nor other adopted documents applicable to the Mill site – including the Pre-Annexation Agreement, and the Post Annexation Implementation Plan – contain a specific policy, directive, or requirement regarding the removal of unpermitted fill. Current City policies and regulations require no net rise of floodwaters and creation of compensatory storage in the floodplain; flood management is addressed in the proposed PCI Plan and discussed in Draft EIS Section 3.3, but these policies do not require the removal of unpermitted fill. Also refer to Response 3.4.1. Chapter 2 of the Draft and Final EISs contains an overview of disputes and litigation regarding the berm and fill.

It should be noted, and is stated in Chapter 2, that the proposed grading plan would remove the berm and unpermitted fill. The Snoqualmie Mill PCI Plan application, submitted to the City in 2017, includes a grading plan for the site that would completely remove the log sort berm. The proposed development plan for the site included in the PCI Plan application provides large areas of open space that would provide compensatory storage of floodwaters and achieve no net rise in the base flood elevation.

(9) Floodplain

It is acknowledged that the Snoqualmie Mill site is located in the floodplain, as is the historic portion of the city. However, the Comprehensive Plan and zoning map designate the site as appropriate for development of commercial/industrial uses. The Draft EIS (Section 3.7.6, page 3-190) discusses the consistency of the Proposal with adopted floodplain regulations.

3.8.2. Consistency with GMA and CPPs

Response:

This response addresses comments that relate to asserted consistency or inconsistency of the Proposal with the Growth Management Act (GMA) and the King County Countywide Planning Policies (CPPs). A comment also stated that an inconsistency with one City Comprehensive Plan policy (requiring the removal of unpermitted fill) was also thereby an inconsistency with the GMA.

It is acknowledged that the GMA provides guidance and a foundation for the development of local comprehensive plans and requires consistency between local plans and GMA planning goals and other requirements. As stated in the statute, however, the planning goals are "used exclusively for the purpose of guiding development of comprehensive plans and development regulations" (RCW 36.70A.020). The planning goals are not used to determine the consistency of individual development projects with GMA.

In any event, it does not follow that the inconsistency of a project with a single comprehensive plan policy, even if determined, would also be considered a violation of the GMA. As indicated in a previous response (see Final EIS Section 3.8.1(8)), the City of Snoqualmie Comprehensive Plan does not contain any policy that requires the removal of unpermitted fill, so the Proposal is

not inconsistent with the Comprehensive Plan on that basis. It is acknowledged, however, that removal of the fill is a City objective and the Draft EIS states that the proposed grading plan includes complete removal of the berms and unpermitted fill.

The CPPs, also mentioned in comments, provide additional guidance and direction to cities for preparing their comprehensive plans. According to the GMA statute, the CPPs are "used solely to establish a countywide framework from which county and city comprehensive plans are developed" (RCW 36.70A.210 (1)). In terms of the countywide land use pattern, the CPPs reinforce the GMA and establishment of an Urban Growth Boundary. But the CPPs do not provide benchmarks to be applied to individual project proposals.

The Snoqualmie Mill site, which is within the City and Urban Growth Area, borders unincorporated rural lands. The EIS evaluates the environmental impacts of the proposed PCI Plan on areas and land uses within and outside the city, including adjacent rural areas. A project-specific EIS is not required to compensate for what the regional agencies, King County, or the City Snoqualmie may or may not have evaluated in prior programmatic SEPA documents for different actions.

It should be noted that the City has evaluated annexation and development of the Mill Planning Area and the Snoqualmie Mill site for commercial and industrial uses in numerous plans, agreements, and programmatic SEPA documents for almost a decade; examples include the Pre-Annexation Agreement (2012), the Snoqualmie Comprehensive Plan (2014), the Post Annexation Implementation Plan (2016), and now the Snoqualmie Mill PCI Plan Draft EIS. Any inconsistency of these prior actions with the Comprehensive Plan or the GMA could have been asserted at that time and are not applicable to the present Proposal. As stated in the Local Project Review Act (RCW 36.70B.030), "*fundamental planning choices made in comprehensive plans and development regulations shall serve as the foundation for project review," and "during project review, the local government or any subsequent reviewing body shall not reexamine alternatives to" the "[t]ype of land use permitted at the site, including uses that may be allowed under certain circumstances, such as planned unit developments and conditional and special uses, if the criteria for their approval have been satisfied; (b) [d]ensity of residential development in urban growth areas; and (c) [a]vailability and adequacy of public facilities identified in the comprehensive plan. . . ."*

The Snoqualmie Mill PCI Plan Proposal is not an appropriate vehicle for challenging City plans and policies.

A comment stated that the Proposal "primarily serves regional urban uses," but it is not clear what this phrase is intended to signify. The EIS clearly states that the Proposal is an urban land use, that it will generate significant jobs and revenue in the City of Snoqualmie, and that it has a tourism aspect. It is also acknowledged, as described in Draft EIS Section 3.6, Land and Shoreline Use, that the site is adjacent to rural recreational, residential, and resource uses. The EIS discloses and evaluates those impacts at an appropriate level of analysis, regardless of whether or not they were considered in regional SEPA documents.

The comment stating that the Proposal is not consistent with "King County's growth plan" does

not identify a specific plan or provide sufficient information to determine what plan is referred to. No further response can be provided.

3.8.3. Consistency with King County/City of Snoqualmie Interlocal Agreement Re: Annexation

Response:

The Pre-Annexation Agreement was executed in 2011 and is summarized in Section 2.2 of the Draft EIS (page 2-8). The adopted Post Annexation Implementation Plan (AIP) for the Snoqualmie Mill site (2016) discusses the consistency of the AIP with the Pre-Annexation Agreement. The City has complied with the with the Pre-Annexation Agreement and, as discussed further below, with the requirements of the 2012 Interlocal Agreement (ILA) with King County, which is based on the Pre-Annexation Agreement.

The operative provisions of the ILA address the following:

- The term of the agreement: indefinite if annexation occurs.
- The boundaries of the territory to be annexed, which encompasses the Mill Planning area/Snoqualmie Mill site.
- Annexation procedures, including publishing notice, holding a public hearing, proposed zoning to become effective upon annexation, a statement regarding the requirement to assume indebtedness, vesting of pending County permit applications and processing by the City. The planning area was annexed in 2012, following required procedures.
- Prohibition on use of the site as a motor vehicle racetrack or speedway: that provision is contained in the Pre-Annexation Agreement, and is reflected in regulations for the PCI zone; the proposed PCI Plan does not include a racetrack.
- Indemnification of the parties and administration of the agreement: these provisions have no policy implications.
- Compliance with federal, state, and local laws, including the OPMA, Public Records Act (PRA), GMA and annexation statutes. The City has complied with and/or is in the process of complying with the identified laws.
- Agreement to advance King County flood policies. City Comprehensive Plan policies and development regulations address floodplain management. As indicated in the Draft EIS, the proposed PCI Plan would provide compensatory flood storage and achieve no net rise in floodwaters.

The Interlocal Agreement also contains numerous “whereas” statements. In general, “whereas” clauses in a contract are considered to be introductory or prefatory statements but are not operating parts of the contract. However, the City has and is continuing to pursue actions that are and will be consistent with the “whereas” clauses referenced in King County’s comments, as described below.

WHEREAS…providing appropriate consideration to the surrounding rural areas for impacts emanating from uses on the property.

The Mill Planning Area is addressed in the Land Use Element of the City of Snoqualmie 2032 Comprehensive Plan, which was prepared pursuant to the GMA. SEPA review was conducted for the Plan and considered surrounding land uses. Similarly, SEPA review for the Post Annexation Implementation Plan considered land uses on the Snoqualmie Mill site and surrounding area. The current EIS considers potential impacts of the proposed PCI Plan to surrounding rural properties.

WHEREAS…continue to work with owners and lessees of the property to protect the rural character of the surrounding rural area and to minimize impacts such as noise, light, glare, vibration and traffic.

The EIS evaluates and recommends mitigation measures for off-site impacts relating to noise, light, glare, vibration, and traffic. The City Council will consider appropriate conditions of approval to reduce such impacts.

WHEREAS…ensure that residents of the surrounding area are notified of any land use planning activities on the property and will have the ability to participate in in applicable comment opportunities.

The City has followed procedures established in its code for notifying residents and interested parties of land use planning activities and proposed projects. Depending on the particular action, appropriate notice may include publishing in the newspaper, mailing to mailing lists, posting notices and other information on its website, and posting on the property. All of these methods were employed for the Snoqualmie Mill PCI Plan Draft EIS. Numerous comments on the Draft EIS were submitted by residents of unincorporated King County and are addressed in responses in the Final EIS.

3.8.4. Development Regulations

Comments stated that adopted development regulations do not adequately address all impacts that will occur (possibly referred to as "SEPA gaps"), including concurrency management, stormwater, groundwater, and flooding. A comment also stated that the EIS should address, not merely identify, all impacts that could occur from discretionary and flexibility options available in the City Code.

Response:

(1) SEPA Gaps

The purpose of a project-specific EIS is to identify and disclose the probable significant impacts that the project will cause, and to identify measures that can be considered and adopted by decision makers to mitigate those impacts.

The term "SEPA gaps" used in the comment is not clear. It may be suggesting that an EIS prepared pursuant to SEPA can or should be used to fill in or compensate for gaps or asserted

deficiencies in existing regulations. Please see the discussion in Final EIS Section 3.8.2 relating to project review; project review is not an appropriate time or place to correct or compensate for any perceived deficiencies in plans or codes (see Local Project Review Act, RCW 36.70B.030 (1)). The adequacy of the City's adopted concurrency management system or other regulatory programs is not an environmental impact of the Proposal and is not an appropriate topic for discussion in the EIS. The comment identified environmental issues at a general level, which is not sufficient to determine whether the specific impacts referred to in the comment are probable or significant, or if they are currently addressed in the EIS.

(2) Discretionary Approvals

The Snoqualmie Mill PCI Plan application does propose some deviations and use of discretionary/ flexibility options permitted by the City Code. The principal proposed deviations/ discretionary modifications include increased building height for two mixed-use buildings, and a wetland buffer enhancement plan. The impacts of these deviations are discussed in the relevant Draft EIS sections (Section 3.9, Aesthetics, Light, and Glare, and Section 3.4, Plants and Animals, respectively). An EIS is focused on the probable significant adverse environmental impacts caused by a proposal and is not required to speculate on hypothetical deviations or to speculate on how the City Council may exercise its discretion. Please refer to WAC 197-11-060(4)(a).

3.8.5. Proposal/Proposed Uses

A comment stated that the PCI Plan would convert an abandoned property into a bustling, busy area. Numerous comments addressed individual aspects of the proposed PCI Plan, particularly land uses. Many of these comments expressed preferences for different uses or site configurations or asserted that the Proposal should be revised to include different uses. A comment stated that future uses were not specific enough or are unknown. Several comments questioned the viability of retail because of the pandemic and reduced spending, or for no specific reason; others stated that retail is not needed. One comment disagreed with the stated purpose of the Proposal and thought that buildout would take longer than 15 years. A comment questioned whether the outdoor performance space is included in the Proposal and stated that its impacts are not evaluated. Another comment stated that the outdoor performance venue represents a worst-case land use scenario and should not be permitted in Planning Areas 2 and 3. A comment questioned a supposed rezone to single-family and heavy industrial uses. A comment expressed a preference for the alternative because (the commenter asserted) it contains more jobs than the Proposal (which is not accurate). A comment stated that the Proposal included too many wineries, while another expressed a preference for non-wine businesses. Some comments stated that affordable housing and greater racial diversity should be incorporated into the project; another stated that affordable housing is required by the Comprehensive Plan. A comment questioned including planting strips as open space based on definitions in the state Open Space Tax Act. Another comment questioned whether the open space calculation for Planning Areas 2 and 3 was accurate since no specific plan has been developed yet. A comment stated that the Proposal does not provide opportunities for

environmental enhancement, and that the river setback should be increased to 165 feet. A comment stated that site access is not identified.

Response:

It is acknowledged, and evaluated throughout the Draft EIS, that the PCI Plan would convert a little-used industrial brownfield property into a mixed-use development with commercial, industrial, retail, and residential uses as well as substantial employment opportunities. Redevelopment of the site is expressly permitted by applicable City plans and zoning and would support the City's ongoing economic development programs.

The opinions expressed in comments about the types of development that are needed, viable, or preferred on the Snoqualmie Mill site are acknowledged but are outside the scope of an EIS. The EIS is based on the proposed PCI Plan that has been formulated by the applicant and submitted to the City. This proposed PCI Plan includes a mix of uses that the applicant believes will implement the project purpose and objectives stated in Chapter 2 of the Draft EIS, that is consistent with applicable land use and zoning designations, and that reflects the applicant's analysis of market opportunities. Some different uses or mixes of uses are considered in the EIS alternatives; these alternatives would generate different numbers of jobs and different costs and revenues accruing to the City. The PCI Plan is a master plan, and specific uses are not typically known at this stage of a land use proposal. More detailed information is known about Planning Area 1, and specific land uses in that area are therefore evaluated in greater detail. Future development in Planning Areas 2 and 3 is evaluated in terms of general categories of activity; this approach is common in master plan proposals and provides sufficient information to determine impacts in an EIS; it also provides sufficient detail for City consideration of the appropriateness of land uses included in the proposed PCI Plan.

The statement that the Proposal does not provide opportunities for environmental enhancement is acknowledged but is not accurate. The Proposal includes enhancement of currently degraded and non-functioning wetland buffers, removal of illegal fill, stormwater management and water quality improvements, phased remediation of legacy contamination, and use of two-thirds of the overall site for open space and habitat. The comment that site plans have not been developed for Planning Areas 2 and 3 is acknowledged; however, the estimated amount of open space is based on preliminary planning concepts for those portions of the property. It is common to include landscaping and planting strips in calculations of open space. The definition of open space in RCW 84.34, the Open Space Tax Act, is only applicable to properties that are proposed by their owners to be taxed pursuant to the program; it is not applicable to the Mill site. The potential to increase the setback from the river was reconsidered based on the comment and is discussed in the alternatives discussion in Chapter 2 of the Final EIS.

The outdoor performance center is a feature of the Redevelopment Alternative and its impacts are discussed throughout the Draft EIS, including its land use impacts. The statement that this use represents a worst-case scenario is acknowledged as the commenter's opinion. As stated frequently in the Draft EIS and in responses in this Final EIS, the outdoor performance center is

not an element of the proposed PCI Plan.

The comment about heavy industrial use is likely based on a map error that occurred during the EIS scoping process and erroneously showed PCI Plan light industrial uses as heavy industrial. This error was noted during the scoping meeting. The Proposal does not include a rezone and does not include heavy industrial or single-family residential uses. The site is zoned Planned Commercial/Industrial (PCI) and would be developed consistent with the uses permitted in that zone. Some multi-family housing in mixed-use buildings is proposed as a conditional use. Draft EIS Section 3.8 (Population, Housing, and Employment) discusses the affordability of proposed housing; it is acknowledged that housing would not be affordable to low-income families. The City Council will determine whether the requirements of Comprehensive Plan Housing policy 4.3.4 is applicable to the PCI zone and to the Proposal and will determine any appropriate mitigation.

Regarding access to the site, please refer to Draft EIS Chapter 2 and Exhibit 2.3-1, which describe and illustrate site access.

3.9. AESTHETICS/LIGHT & GLARE

Comments generally stated that proposed 55-foot high buildings were "too high," would be very visible from all directions or from some properties to the northeast or would "spoil views." A comment questioned what the rectangles on the view graphics indicated. Comments stated that the view locations used for the analysis were not sufficient, omitted specific locations (e.g., northeast of the city), or should represent seasonal variations. Comments stated that lighting impacts of the outdoor performance venue were not evaluated. A comment stated that the overall development would not be consistent with the "rural feel" of this portion of Snoqualmie. Another comment disagreed with a statement in the Draft EIS that change to site from development would not be adverse.

Response:

As noted in Draft EIS Section 3.9, the view analysis locations were selected to present views from representative locations from which the general public would most likely have views of the site. Views from private properties, such as a specific neighborhood to the northeast, are generally not considered appropriate for visual analysis; views from this direction are discussed in the analysis, however (see Draft EIS pages 3-206/207). Representative views and locations, as opposed to all views and locations, are considered appropriate for visual impact analysis.

The view simulations represent what portions of the site and proposed buildings in Planning Area 1 would and would not be visible from the view analysis locations. The rectangles on several view photos in the Draft EIS identify the general location of the site from visual perspectives, where proposed site development would be located behind vegetation and generally blocked from view. As indicated by the January dates of the photos, deciduous trees are bare of leaves in this season, so the site is most exposed to viewing; representing seasonal variations would likely further obscure views of the site.

In general, individual perception and taste are significant aspects of one's reaction to aesthetic change, and this subjective element makes conclusions about the nature of change very variable. Statements to the effect that proposed buildings are "too high" are noted as reflecting the personal perceptions or opinions of the commenters. The Draft EIS acknowledges that proposed building heights would require a deviation from zoning standards.

The view photos and simulations in the Draft EIS are intended to indicate where the developed site would and would not be visible from, and what a viewer would see. The EIS identifies that the change in aesthetic character of the site from development would be significant; whether this change is also considered to be adverse would depend on subjective reactions, however. In terms of the historic use and aesthetic character of the site, redevelopment would echo the size and nature of the mill's historic buildings and industrial activities. It is acknowledged that some viewers may consider the change to be adverse.

The perceived change in the "rural feel" or character of the area that is expressed in a comment is acknowledged. Draft EIS Section 3.6 (Land and Shoreline Use) and Section 3.7 (Consistency with Plans and Policies) discuss planned land uses. The site and the Mill Planning Area are within an Urban Growth Area and are designated and zoned for industrial use in the

Snoqualmie Comprehensive Plan and zoning map, respectively. As described in Chapter 2 of the Draft EIS, approximately two-thirds of the overall site area would remain as undeveloped open space. Nevertheless, the site would be developed for urban uses, consistent with plans and zoning, which will result in a change in rural feel.

3.10. HISTORIC & CULTURAL RESOURCES

3.10.1. Potential Historic District

Comments from several agencies with jurisdiction, agencies with expertise, and interested organizations expressed concurrence with the EIS analysis that identifies a potential historic district on portions of the site and the conclusion that the district is potentially eligible for listing in the National Register of Historic Places (NRHP). Several comments also recommended incorporating, preserving, and rehabilitating all buildings, sites, and structures that contribute to the historic character of the potential district. Comments further recommended that the potential district boundary should include the site of the Japanese Community Settlement; the demolition, alteration, or removal of contributing elements to the potential district should be avoided or minimized; and mitigation measures should reduce the impact of loss of any elements.

Various comments also stated that a National Register nomination for the potential historic district should be prepared and submitted to fully address impacts if development or any work or demolition in Planning Areas 2 and 3 occurs. Comments suggested that a preservation plan be prepared to incorporate components of the district in future development, and that a management plan should be developed for the site's resources. An agency comment provided guidance on state agency requirements for submitting documents. Another comment noted that federal tax credits could be available for the rehabilitation of historic buildings.

Response:

The Draft EIS and the Cultural Resources Assessment report (Draft EIS Appendix E) evaluate the historic resources on the Snoqualmie Mill site, identify a potential historic district (in addition to identifying individual structures that are eligible for NRHP listing), and conclude that the district could be eligible for listing on the NRHP. Agency concurrence with these finding is acknowledged.

A comment suggesting elements of a potential historic district is acknowledged; however, the purpose of the suggestion is unclear. The elements listed in the comment "*…sections of the rails and transfer route locations, along with elements from the Planar Mill-Crane Shed, Package Lumber Shed, and Finished Lumber Shed*" are recommended in the Assessment and EIS as being contributing elements to the proposed district. Draft EIS Exhibit 3.10-8 and Draft EIS Appendix E Table 7, reproduced below, identify potential elements of an historic district and summarize their eligibility. Draft EIS Appendix E, Section 8.2.2, contains an evaluation of the eligibility for all cultural resources included in the exhibit and table. The rationale for the recommendations of eligibility or non-eligibility of each resource is provided on pages 80 through 89 of Appendix E of the Draft EIS; the discussion in Draft EIS Section 3.10 is focused on eligible resources.

Exhibit 3.10-1. Draft EIS Evaluations of Cultural Resources

Cultural Resource	Location (Project Phase)	Recommendation for Listing
45-KI-1473	Planning Area 1	Not eligible
45-KI-1474	Planning Area 1	Eligible
Power Plant	Planning Area 3	Listed King County landmark; Contributes to district
Fuel Vault	Planning Area 3	Contributes to district
Dry kilns	Planning Area 3	Contributes to district
Transfer shed	Planning Area 3	Contributes to district
Transfer Rails & Routes	Planning Area 3	Contributes to district
Crane Shed No. 3	Planning Area 3	Eligible and Contributes to district
Planing Mill-Crane Shed	Planning Area 3	Eligible and Contributes to district
Planing Mill	Planning Area 3	Not eligible; Contributes to district
Finished Lumber Shed	Planning Area 2	Not eligible; Contributes to district
Package Lumber Shed	Planning Area 2	Eligible and Contributes to district
SFLCo historic district (district)	Planning Areas 2 and 3	Eligible
SquEd	1 mi downstream	Listed in the NRHP
Snoqualmie Falls Hydroelectric Power Plant Historic District	0.2 mi from SMV property	Listed in the NRHP
Snoqualmie Falls Cavity Generating Station	0.4 mi from SMV property	Listed in the NRHP
Snoqualmie School Campus	0.5 mi from SMV property	Listed in the NRHP
Snoqualmie Depot	0.4 mi from SMV property	Listed in the NRHP
Snoqualmie River Bridge	0.1 mi from SMV property	Determined eligible, register not stated.

SMV = Snoqualmie Mill Ventures, LLC.
Source: Draft EIS Exhibit 3.10-8, and Appendix E, Table 7.

Development of the Snoqualmie Mill site would be phased over an approximate 15-year period. Although the timing of development of Planning Areas 2 and 3 is uncertain, and would respond to market conditions, development would likely commence no earlier than approximately 2024 for Planning Area 2 and 2032 for Planning Area 3. The timing of development would also be dependent on planning and financing of needed infrastructure improvements, including a new Railroad Avenue/SR 202 bridge, as identified in the EIS. With the exception of testing and similar investigations in connection with site planning, no specific alteration or other work is proposed in Planning Areas 2 and 3, although it is acknowledged in the EIS that development of these areas could affect some of the listed cultural resources.

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.

The Cultural Resources Assessment identifies numerous management recommendations for the project site's resources; please refer to Draft EIS Appendix E, pages 92–96. The Draft EIS also concludes that development in Planning Area 1 would not adversely affect resources directly, or adversely affect resources in Planning Areas 2 and 3. Existing uses in Planning Areas 2 and 3 will continue, and existing buildings, structures, and sites will continue to be used as they are currently until these portions of the site are planned, proposed, and approved for development.

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 comment regarding the potential availability of tax incentives for reuse of historic buildings is acknowledged and appreciated. However, as also identified in the EIS, several remaining buildings or portions of buildings are severely deteriorated and structurally unsafe and are not likely to be salvageable. Based on information provided by the applicant, and inspections performed by the City, these include the Package Lumber Shed, the Planing Mill Shed, the western portion of the Planing Mill Crane Shed, and the shed roof on the northwest side of Crane Shed No. 3. Individual buildings are identified in the Draft EIS Appendix E, Figure 19.

The Washington State Department of Archaeology and Historic Preservation (DAHP) requirements for submitting documents are acknowledged.

3.10.2. Fieldwork/Methodology, Generally

Some comments observed that fieldwork involving physical survey or testing to determine the presence of archaeological resources was limited to Planning Area 1 and stated that the Cultural Resources Assessment should include the whole site. Comments also stated that the survey of Planning Area 1 was too limited. Comments from DAHP expressed agreement with management recommendations in the Cultural Resources Assessment regarding survey of Planning Areas 2 and 3 in the future, before development occurs, to determine if and where additional archaeological work is needed. Some comments stated generally that more information and fieldwork are necessary.

Response:

It is acknowledged that the survey in the form of probes or excavation was limited to Planning Area 1 and included attempting to find evidence of the Japanese community bunkhouses (45-KI-1474) where Japanese mill workers and their families lived; this resource is discussed further in the following response. Planning Area 1 is the only portion of the Mill site that has been planned in detail and the only portion of the PCI Plan that is proposed for development at this time. As described in the EIS, the applicant's intent is to plan, evaluate, remediate, and develop the project site in phases over an approximate 15-year period. This phased approach is reflected in the Draft EIS, which evaluates Planning Area 1 at a project-specific level and Planning Areas 2 and 3 at a programmatic level. A phased approach is typical for master plan

projects and is consistent with SEPA requirements.

Draft EIS Appendix E contains extensive documentation of the history of the Mill site and the investigations that were conducted for the EIS. Comments that generally stated that historic information and investigations are insufficient without identifying in what regard such information or investigations is deficient, are acknowledged as the opinions of the commenters; a more detailed response is not possible.

Although the archaeological survey was limited to Planning Area 1, the Cultural Resources Assessment does address the cultural and archaeological history of the entire Mill site. Maps, based on probability modeling, showing areas of high, medium, and low risk for the presence of archaeological resources were provided (Draft EIS Appendix E, pp. 40, 42) as well as a proposed survey design. As acknowledged by DAHP, the report's management recommendations include completing additional survey work in conjunction with ongoing planning of Planning Areas 2 and 3. It should be noted that approval of the proposed PCI Plan would not authorize any physical development of Planning Area 1 or other portions of the site, so existing resources would not be at risk for disturbance resulting from PCI Plan approval.

The extent of the survey conducted for Planning Area 1 is addressed in the following response.

3.10.3. Japanese Community Site (45-KI-1474) in Planning Area 1

The resource referenced in the following comments is referred to in the EIS and comment letters as the *Japanese community sit*e or the *Japanese bunkhouse;* the bunkhouses housed Japanese workers and their families, separate from other Mill workers. Refer to Draft EIS Appendix E for the Archaeological Site Inventory Form, which describes the site boundary, its location under the landscape, and its history and character. Refer to Draft EIS Appendix E, Figure 11 for the area considered to be sensitive and encompassing the footprint of the Japanese community.

(1) General Comments

A comment acknowledged that the cultural resources consultant and the applicant met with Karen Yoshitomi of the Japanese Cultural and Community Center of Washington (JCCCW), representatives of other organizations, and an interested citizen on site, but stated that the Japanese American Citizens League (JACL), which is located in Washington D.C., was not present and was not mentioned in the Draft EIS. The comment also noted that the JCCCW representative was not present during the subsequent field survey. The comment also expressed a need to consult with the JCCCW and JACL. A copy of a resolution adopted by the JACL in 2017 was incorporated in the comment letter; it contains numerous statements regarding the Japanese community and the Mill site as a whole, including how the Mill site should be designated in the NRHP.

Several comments recommended further consultation with DAHP and stated that the applicant should develop and implement an interpretive plan for the site that would include a comprehensive history of the Japanese community as well as the entire mill facility, in

consultation with affected agencies, parties, and tribes. It was suggested that the interpretive signage be placed along a pedestrian/biking trail. Another comment suggested commemorating the history of the site, such as by establishing a museum.

Comments stated that ground-disturbing activities should be monitored and noted that any site alteration will require archaeological permits from DAHP pursuant to RCW 27.53.

A comment stated that the Japanese community site, an archaeological resource, should be kept separate from the potential historic district. The comment also questioned who would prepare an NRHP nomination.

Response:

JCCCW representative Karen Yoshitomi met on site with the consultant, applicant, and other interested parties. It is acknowledged that the JACL is not mentioned by name in the report, nor are other interested organizations. In general, interested parties are not typically identified in an assessment; the JACL comment letter is included in the Final EIS and responses to their expressed concerns are provided. The comment does not explain the significance of Ms. Yoshitomi not being present during the field survey, and no further response is possible.

The comments in the JACL resolution are acknowledged. When the resolution was written, archaeological material associated with the Japanese community was not identified. The resolution was in regards to the Mill site, with emphasis on the contribution of Japanese employees. It is acknowledged, and stated in the Cultural Resources Assessment, that the Japanese community archaeological site is significant and is recommended eligible for listing in the NRHP. As explained in Response 3.10.1 above, other portions of the Snoqualmie Mill site, outside Planning Area 1, will be evaluated further, as required under SEPA, when development plans are more certain. The assessment for those areas reflected in the Cultural Resources Assessment is sufficient to determine the significance of resources, both archaeological and historic (e.g., buildings, structures) across the entire site and to identify a potential historic district, and properties potentially eligible for listing at the individual level.

The applicant has reached out to the JCCCW and JACL to identify potential measures that could be incorporated into the proposed PCI Plan to help memorialize the contribution of the Japanese community to the history of the area and the site.

The Draft EIS does recommend monitoring ground-disturbing activities in the general footprint of where the Japanese bunkhouses stood, which encompasses 45-KI-1474. The requirement to obtain appropriate archaeological permits from DAHP prior to undertaking work is similarly acknowledged in the Draft EIS.

Various statements and recommendations provided in comment letters on the Draft EIS express a difference of opinion as to whether site 45-KI-1474 should be included or excluded from the potential historic district. Historic districts can contain both buildings and archaeological resources. Professional archaeological consultants hold different opinions on whether to include or exclude a separate archaeological resource from the proposed historic district. The Cultural Resources Assessment (Draft EIS Appendix E) articulates a rationale that

could exclude the Japanese community archaeological site from the district based on its distance from the concentration of historic buildings and structures, as well as different contexts of significance that are applicable to the archaeological resource associated with a community of people and the industrial mill site (refer to Draft EIS page 3-244, Appendix E pages 86–87), and the fact that the resource would be protected by the state's archaeological permit requirements. However, the Draft EIS also states that some professionals would include the archaeological site in the potential historic district. DAHP commented (2-2) that the Japanese community site should be "considered" for inclusion in the historic district. Further consultation with DAHP and other interested agencies and organizations is underway and is expected to continue in parallel with the land use planning process and will help to determine the preferred path forward.

State law prohibits disclosure of the specific location of archaeological resources and provision of other information from which an interested party might determine the specific location of resources (RCW 42.56.300). The specific location of Trench 5 was redacted from the report for this reason.

(2) Additional Survey/Investigation

Some comments disagreed with the Draft EIS conclusion and recommended additional survey work in Planning Area 1 to delineate the extent of the Japanese community site. A comment stated that a complete study and record of what the Japanese community was forced to leave behind is important and provides an educational opportunity and insight into institutional racism and discrimination.

Other comments expressed agreement with the Draft EIS recommendation that additional subsurface investigations in locations with thick fill are not practical, but that archaeological monitoring of construction excavations below fill is necessary. A comment asserted that information on the thickness of fill is inadequate. A comment noted that the locations of survey trenches (specifically Trench 5) are blacked out on report graphics.

Response:

The cultural significance of the Japanese community site is not disputed and the Draft EIS recommends it eligible for listing in the NRHP. Comments recommending additional survey are acknowledged. 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.

(3) Additional Mitigation

Several comments stated that additional mitigation is necessary, including preparation of an NRHP nomination, to compensate for impacts to resources in Planning Area 1. Unavoidable impacts to Planning Areas 2 and 3 may warrant mitigation beyond DAHP's Level II documentation standards, according to one comment. A comment stated that necessary demolition should be mitigated by rehabilitation of the most significant historic components and structures. A comment called for the preparation of an interpretive plan for the entire site that includes a comprehensive history of mill operations and settlement, and interpretive signage on the pedestrian/bike trail about history. A comment also recommended that the applicant consider state and federal tax incentives for historic preservation.

Response:

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).

Specific measures and features that will be preserved or incorporated to accomplish this

objective will be determined based on further consultation with agencies, tribes, and interested organizations in parallel with the land use approval and permitting process.

3.10.4. Cultural Properties

Comments observed that the Cultural Resources Assessment (Draft EIS Appendix E) contains limited ethnographic information about the Snoqualmie Indian Tribe and the Snoqualmie Falls Traditional Cultural Property (TCP). The Draft EIS also uses incorrect terminology ("Snoqualmie Nation") to refer to the Snoqualmie Indian Tribe. A comment stated that no information was obtained directly from the Tribe concerning the significance of Snoqualmie Falls, and that the report relied on information from the National Register listing. Several comments stated that investigation and consultation with the Snoqualmie Indian Tribe were not sufficient.

Comments also expressed concern about indirect effects of the Proposal and alternatives to the Snoqualmie Falls TCP. A range of other concerns were expressed, including views, traffic, and noise. A comment stated that there are numerous sites within a 0.5- to 1-mile radius that could be affected, but are not mentioned in the EIS (e.g., Two Sisters Return), and that a full report would need to consider Planning Areas 2 and 3. The comment also requested further consultation specific to the Snoqualmie Falls TCP with the Snoqualmie Indian Tribe. A comment expressed concern about the presence of a gravesite on the property.

Response:

The EIS cultural resources consultant contacted and met with representatives of the Culture Department of the Snoqualmie Indian Tribe in 2017 to discuss the proposed project, Snoqualmie Falls, and the importance of the area around the Falls. A follow-up meeting was scheduled in the fall of 2020 but was canceled due to illness. The City and the applicant agree that further consultation with the Snoqualmie Indian Tribe is needed, and the applicant indicates that further consultation is actively being pursued.

It is acknowledged that the Draft EIS contains general and limited information about the history and cultural practices of the Snoqualmie Indian Tribe. The primary focus of the Draft EIS analysis regarding Native American cultural resources is on potential impacts to the designated Snoqualmie Falls TCP; the information relied on came from the National Register nomination, as well as several other sources that provided background information, including the Snoqualmie Indian Tribe's website, court documents, previous environmental documents, and published newspaper articles and interviews providing background information. The City and the consultant apologize for incorrect references to the name of the Tribe.

The Draft EIS does generally identify the existence of other recorded cultural resource sites within 1 mile of the Snoqualmie Mill site based on a query of DAHP's WISAARD database (the Washington Information System for Architectural and Archaeological Records Data). The consultant withheld specifics about these and other sites to ensure that their location or features were not disclosed in respect to the wishes of the Snoqualmie Tribe and to avoid inadvertent violation of state law. Information on Two Sisters Return was not available on WISAARD, and the consultant was not certain which information about this site might be

considered confidential. The consultant was unable to obtain clarification from Tribal cultural resources staff of the Tribe's policy regarding the disclosure of information.

In general, any potential direct impact or disturbance to off-site archaeological resources would be a result of the proposed relocation and improvement of a section of Mill Pond Road, the project entrance, and reconstruction of the stormwater outfall. Other off-site construction with the potential to affect resources would be an indirect result of road improvements to mitigate identified impacts. Based on the EIS analysis, a new or expanded SR 202 bridge across the Snoqualmie River is not needed for development of Planning Area 1 but would be required to accommodate future development of Planning Area 2 and 3. The Draft EIS identifies that inter-governmental planning and coordination, and environmental review, would be required to plan, design, and fund a new bridge. Until the location and design of a new bridge are known, however, it is not possible to determine what if any impacts could occur to known cultural resources

Comments also addressed impacts to views, traffic, and noise; these potential impacts are also discussed in other sections of these responses to comments (please see Final EIS Sections 3.9, 3.11, and 3.12). The EIS Aesthetics analysis concludes that Planning Area 1 would not be visible from the Snoqualmie Falls parking area (the location considered the most likely to have views to Planning Area 1) or trails (see Draft EIS page 3-221). Lighting from the project, however, could be visible to some unquantifiable degree, and is acknowledged on Draft EIS page 3-224. The list of potential impacts to cultural resources in the Draft EIS (page 3-247) should be expanded to include lighting, along with transportation, air quality, and noise. The Draft EIS does identify potential indirect impacts to the Snoqualmie Falls TCP from the Redevelopment Alternative from outdoor lighting during events at the outdoor performance center resulting from lighting of the project site (see Draft EIS Section 3.9, Aesthetics, Light, and Glare). Mitigation is identified in each appropriate section of the Draft EIS. Note that the outdoor performance center is only included in the Draft EIS Redevelopment Alternative and is not part of the proposed PCI Plan. Any impacts related to the outdoor performance center are not attributable to the Proposal.

The expression of concern about a gravesite is acknowledged. The consultation and research of historic site uses did not identify the use of the site for burials.

3.10.5. General Comments on Historic and Cultural Resources

A comment questioned whether the Powerhouse and Planer building were "important." Another comment stated that all existing buildings should be preserved. A comment stated that the history of the site should be commemorated.

Response:

The question of whether an individual historic building is "important" is answered in the Draft EIS in terms of the overall history of the use of the site, and applicable criteria in federal and state programs and eligibility for designation on federal or state registers of historic properties. Draft EIS Section 3.10 and Appendix E contain an evaluation of potential eligibility of the Planer

building and conclude that it is eligible for designation in the NRHP. As noted in the Draft EIS, the Powerhouse was previously designated as an historic resource by King County, and the applicant has committed to rehabilitating and reusing this building if financially and physically practicable. It is acknowledged that some individuals may not consider these buildings to be important according to subjective considerations.

The statement that all buildings should be preserved is acknowledged as the opinion of the commenter. As noted in Response 3.10.1 above, several existing buildings or portions of existing buildings are deteriorated and structurally unsafe.

As noted in Response 3.10.3 above, the applicant is working with the JCCCW and the JACL to identify measures that will commemorate the history and contribution of the Japanese community.

3.11. TRANSPORTATION

Substantive comments received on the *Snoqualmie Mill PCI Plan Draft EIS* related to transportation were primarily identified in comment letter 15, Attachment D. Several other comment letters also referenced and/or incorporated these comments. Several comment letters identified traffic as a general concern but did not identify specific concerns in detail. A number of additional transportation related comments, some general and other more specific, are also documented and addressed. Comments related to traffic noise are addressed in Final EIS Section 3.12, Noise.

3.11.1. Traffic Counts

Various comments were related to the existing traffic counts and baseline data used in the Draft EIS traffic analysis. The comments stated that the turning movement counts (TMCs) are over 2 years old and were collected in January/February 2018. The comment suggested that traffic counts used in a traffic impact analysis must be within 1 year of the date of the analysis.

Additionally, comments noted that the TMCs were collected during the months of January and February, which are asserted to be the months with the lowest observed traffic volumes, based on the comments' review of traffic count data on SR 18 at I-90.

The comments indicated that the Draft EIS utilized TMCs collected during the AM (7:00 AM – 9:00 AM) and PM (4:00 PM – 6:00 PM) peak periods, and that there was no documentation to support the contention that these hours represent actual peak periods in Snoqualmie.

Comments also requested that the EIS conduct 7-day 24-hour tube counts at selected locations within the study area to identify traffic flow patterns including average and peak weekday and weekend volumes, peak hours on average weekdays and weekends, and that new counts would provide a basis for weekend traffic counts and analysis.

Lastly, one comment suggested that the TMCs used in the analysis should be within 1 year of the date of Draft EIS publication and should not reflect volumes under COVID-19.

Response:

Counts were collected at the start of the study period and are considered appropriate for describing existing conditions in the Affected Environment. The traffic analysis evaluated the impact of the project in the future, and the future traffic forecasts were estimated at the time of the project buildout years.

City of Snoqualmie policy does not establish any maximum age for traffic counts. While some agencies require updating after a specified period, there is not an established age limitation as a standard practice. The 2018 counts are still reasonable and valid, especially in the absence of significant development or other changes that would suggest changes in background traffic levels.

Monthly counts at Washington State Department of Transportation (WSDOT) Permanent Traffic Recorder (PTR) locations in the area were provided by WSDOT and reviewed by the EIS

transportation consultant (TENW). The PTR locations reviewed include stations 206 (SR 202 @ milepost [MP] 9.65) and 826 (I-90 @ MP 23.54). Based on review of the 2018 monthly data provided by WSDOT, the months of January and February were within 10% of the yearly average at both locations. It should also be noted that the monthly volume on local Snoqualmie streets does not fluctuate as much as traffic on state highways and is typically within 10%, which is also generally within the range of daily traffic fluctuations.

Regarding the peak period evaluation, analyzing the weekday AM peak hour from 7:00 – 9:00 AM and the weekday PM peak hour from 4:00 – 6:00 PM is standard transportation engineering practice. Additionally, historic daily traffic counts on Snoqualmie Parkway were provided by the City and reviewed by TENW. Based on a review of this information, both the AM and PM peak hours on Snoqualmie Parkway were within the standard weekday AM and PM peak periods described above.

3.11.2. Trip Generation

Comments recognized that trip generation for proposed land uses in the Draft EIS reflects vehicle trips identified in the 10th Edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual, which is based on studies done across the U.S. The comment asserted that these national studies are not necessarily representative of trip generation rates in the Snoqualmie Valley. The comment questioned the Draft EIS adjustment of the Puget Sound Regional Council (PSRC) traffic model. The comment also asserted that Fehr & Peers' proprietary tool, MXD+, developed for the EPA and used to estimate internal trip capture, substantially overestimates the internal capture rates for the multi-family land use.

A comment suggested that trip generation rates should reflect person trips--not just vehicle trips-- and should consider pedestrians, bicycles, and transit ridership.

Another comment stated that the Draft EIS fails to provide a trip generation estimate for recreational or summer traffic volumes and the impact of the proposed development site on summer/recreational traffic.

Additionally, a comment stated that the Draft EIS fails to document the estimated trip generation associated with construction activity.

Additional comments stated that the land uses assumed in the trip generation estimate do not match those that are included in Draft EIS Exhibit 1.4-1 summarizing the Snoqualmie Mill Development Plan.

A comment noted that the Draft EIS does not accurately apply a pass-by reduction because the Snoqualmie Mill PCI Plan does not include a "shopping center" ITE land use that is consistent with the definition provided for the trip generation identified in Planning Area 1.

Lastly, comments asserted that the analysis of the No Action/baseline scenario does not include "pipeline" projects (i.e., other development proposals already in the pipeline prior to the horizon year of the Snoqualmie Mill site).

Response:

(1) Trip Generation Methodology

The ITE Trip Generation Manual is used across the entire transportation industry as the standard and generally accepted source to estimate traffic generation for a variety of land use types, and it is a nationally adopted document. The trip rates in the ITE manual represent reasonable estimates of traffic generation for the land use types proposed for this project.

The land use categories applied from the ITE Trip Generation Manual match the proposed land use categories, such as industrial park, shopping center (which can include a range of retail and restaurant uses), and residential multi-family housing. The shopping center category was considered the best match for the mix of uses that are proposed in Planning Area 1.

It is acknowledged that the trip generation estimates for the traffic analysis focus on vehicle trips. While some traffic may be generated by pedestrians and transit, those trips are anticipated to be minimal due to the suburban character of the study area and general absence of a dense urban environment that would generate higher levels of pedestrian and transit trips. The Draft EIS approach is believed to provide an appropriately conservative evaluation of traffic impacts.

(2) Traffic Forecasts

Traffic forecasts were provided by the City's outside transportation engineering consultant, Fehr & Peers, and are described in the memo titled "Trip Distribution Analysis for the Proposed Snoqualmie Mill Development" (Draft EIS Appendix F). The forecasts take into consideration the variation in daily traffic levels over the course of a year.

Fehr & Peers used a proprietary analysis tool (MXD+) to confirm TENW's internal trip capture estimates as reasonable to use for the EIS. The approach Fehr & Peers used to estimate mixed-use trip generation accurately estimates internal trips by considering various built environment variables such as land use density, regional location, mix of uses, and various design variables when calculating the project's internal trips, and external trips made by auto, transit, and non-motorized modes. Internal trips are made by people making multiple stops within a development without generating new trips onto the adjacent street system. The internal trip reductions for the residential and retail uses were based on the established methodology in the ITE *Trip Generation Handbook*, 3rd edition.

MXD+ was developed using more than 250 sites from across the country and validated using dozens of independent sites, including several in Western Washington. This level of model development and validation far exceeds other traditional methods. While the PSRC model is calibrated to regional travel patterns across large screenlines (e.g., total flows into and out of King County, cross-lake flows, and total vehicle miles traveled [VMT] generated in the four-county region), the PSRC model is not accurate when applied without calibration at the scale of the proposed PCI Plan development. The structure of the traffic analysis zones (TAZ) used for the PSRC model's analysis is too coarse; in addition, the details of the site design and potential for uses to interact are not variables that can be specified in the PSRC model. Based on a review

of MXD+ calibration and validation data, the PSRC model is not an accurate or appropriate tool for project-specific trip generation.

Pass-by percentages provided by the ITE Trip Generation Manual are a state of the practice method and reasonable for use in this study.

(3) Pipeline Development Projects

Fehr & Peers worked with the City to identify growth by TAZ, which included approved pipeline projects, such as the expansion of the Salish Lodge (which was subsequently withdrawn). The assumed pipeline projects did not include growth associated with individual projects that were not yet approved, such as expansion near the Casino, which currently lacks adequate infrastructure and is therefore speculative. As confirmed in the memo previously mentioned, the following pipeline projects were included: the Salish Lodge expansion, the local hotel and retail complex in the Snoqualmie Ridge Business Park, and affordable housing development in Snoqualmie Ridge near Eagle Point. The forecast model did include background growth based on planning projections in the Comprehensive Plan.

3.11.3. Trip Distribution

A comment suggested that the buildout projections of the residential, retail, and industrial park are too aggressive, and that a market analysis is needed to support the assumptions. Another comment suggested that the 2023 and 2032 horizon years should be adjusted.

Response:

The future year buildout scenarios were identified by the applicant based on their future buildout schedule. The traffic analysis identified future traffic generation from the project and background growth for those buildout years in 2023 and 2032, then evaluated the traffic impacts, and identified measures necessary to mitigate the transportation impacts.

Fehr & Peers provided annual background traffic growth rates for vehicular traffic on five key roadways across the City, ranging from 0.5% to 2.1% per year. These growth rates were based on the confirmation of pipeline projects and the regional model outputs. Regional model outputs coupled with knowledge of local travel patterns and historic growth are a standard approach to estimating background growth.

Regarding the asserted need for a market analysis, please see Fiscal & Economic Impact Response 3.15.1. SEPA does not require an applicant to demonstrate a need for any particular land use or to justify its proposal. Similarly, neither City policy nor adopted regulations require a market justification for an applicant's proposal.

3.11.4. Traffic Forecasting & Modeling

A comment noted that the traffic forecasting process provides a "gross" estimate of future traffic volumes, and that a more refined and credible process is necessary. Another comment questioned the accuracy of the peak hour calculations.

Response:

Post-processing the regional model results and overlaying more accurate project-specific trip generation on top of the regional model represents the state of the practice for these types of studies. Adjustments to the PSRC model were appropriate, and consistent with the state of the practice. The compound annual growth rate preserves existing travel trends, which is appropriate given the relatively low growth projected in Snoqualmie.

In reference to the asserted limitations in use of the regional model for the proposed PCI Plan, creating a new subarea traffic model, or attempting to "refine" the regional model to function as a subarea model, would require substantial effort, cost, and exercise of engineering judgement, and is considered to be unnecessary and beyond the scope of a project-specific traffic analysis for a project of this type and scale.

Developing a subarea model could potentially require many more adjustments than using a model that largely relies on data provided directly by PSRC. Zone splits, for example, as suggested by the comment, could result in traffic being loaded on inappropriate roadways. Moreover, there is inadequate regional household travel survey information to accurately calibrate/validate a subarea model. It is not a typical practice, nor would it necessarily improve the accuracy of the impact analysis to perform a more detailed household travel survey and subarea model development for a project of this scale.

The comment states that the model should reflect the housing location of Snoqualmie Mill site employees. However, given that this project does not include housing that is specifically reserved for Snoqualmie Mill employees, arbitrarily assigning housing for employees would be purely speculative. The benefit of the regional model is that it accounts for housing across the region and includes typical commute travel lengths based on the regional household survey. There is no reason to believe that after the project has been built out and operating for a sustained period that the home locations of employees would substantially differ from regional/sub-regional patterns predicted by the PSRC model.

Although each community is unique, the variety of example communities used in the traffic model methodology provides a less-biased assessment and range of data based on a mix of office/industrial employment that is also proposed for the project site. As noted in the technical documentation prepared for the Draft EIS and based on the Census data for the analogous sites, the employee trip distribution was adjusted slightly to increase the number of employees likely to live within 5 miles of the project compared to the raw model output. The comment stated that this analysis is flawed because the analogous sites are served by a major freeway and the Mill site is not. In actuality, closer proximity to a major freeway would tend to *increase* the distance that commuting employees would be willing to travel rather than decrease it, which is what is implied by the comment. When considering the location of the site and the relatively more affordable housing stock located within 3 to 5 miles of the Mill site (compared to some of the more urban examples used for the Draft EIS analysis), the adjustment documented in Draft EIS Appendix F is reasonable. As documented in the Draft EIS, the transportation consultant worked with City staff and other transportation experts to identify similar industrial/office sites in the region that could be used to provide insight into the unique

land use mix included in the Snoqualmie Mill PCI Plan and to evaluate in the traffic model. Three of the four sites used for this purpose are located on the east side of Lake Washington. This approach is documented in a memorandum from Fehr & Peers (August 7, 2018) included in Draft EIS Appendix F.

The AM and PM peak hour traffic calculations are believed to be accurate notwithstanding the comment questioning their accuracy, which is acknowledged.

3.11.5. Pedestrian/Bicycle Impacts

Comments indicated that there was no information related to an estimate of trip generation for bicycles and pedestrians, and no discussion of the potential reduction in vehicle traffic through incentives for bicycle and pedestrians to encourage mode shift. Another comment indicated that there was a lack of potential bicycle and pedestrian routings between the site and major traffic generators such as Snoqualmie Ridge.

Response:

The trip generation estimates used in the Draft EIS traffic analysis were based on standard practice and application of the ITE Trip Generation Manual. The trip rates for the different land use categories are based on a "suburban" location, and the trip generation estimates were not adjusted to account for bicyclists of pedestrians. This provides for a conservative evaluation of vehicle traffic impacts. Given the project land uses and surrounding bicycle facilities, it is extremely unlikely that bicycle users would exceed the capacity of bicycle facilities.

It is not standard practice to quantify pedestrian and bicycle trips in transportation impact analyses, except in jurisdictions that have adopted a multi-modal concurrency program (i.e., one that considers all modes of travel such trips when evaluating level of service) or for land uses with exceptionally high pedestrian or bicycle trip generation that could exceed the capacity of the existing or planned facilities. The City of Snoqualmie has not adopted a multi-modal program, and, as noted earlier, the planned land uses on the site would not generate large numbers of pedestrian or bicycle trips; therefore, bicycle and pedestrian trips were not estimated separately. The PCI Plan includes pedestrian and bicycle connections between the site and regional trail networks, which are described in Chapter 2 of the Draft EIS and in the discussion of Parks in Section 3.13 of the Draft EIS.

3.11.6. Safety Impacts

A comment suggested that there was a lack of information regarding the potential for additional crashes with the added project traffic, and a lack of mitigation to eliminate or minimize crash volumes. Another comment suggested that there were no measures to address the goals of Target Zero – a Washington State Strategic Highway Safety Plan. A comment noted that the absence of shoulders along Mill Pond Road was a safety hazard for pedestrians and that additional traffic would pose a risk to trail users.

Response:

Collisions at the study intersections and roadway segments in the project vicinity were reviewed and summarized for the most recent 5-year period that data were available (2013 – 2017, as provided by WSDOT). Fifteen study intersections and 13 roadway segments were evaluated. A rate for collisions per million entering vehicles (MEV) was estimated at each of the study intersections. A collision rate per MEV over 1.0 typically warrants further review to see if a pattern exists. Only one study intersection (SR 18 / I-90 WB Ramps) has an MEV over 1.0. There was a total of 58 reported collisions at this intersection during the 5-year period evaluated. Further review indicates that most of the collisions at this intersection (38 out of 58) were either rear-end or sideswipe type collisions. It should be noted that this intersection will be improved with the new I-90/SR 18 "diverging diamond" interchange, which is expected to improve traffic flow and address this collision type.

Review of the 5-year collision history at all study intersections and roadway segments indicates that there were no fatalities. At the 15 study intersections over the 5-year period, there were 150 total collisions, and only 2 (approximately 1%) were suspected to involve serious injuries.

Mill Pond Road is a two-lane City collector with intermittent shoulders on both sides and a posted speed limit of 35 mph. The existing road does not have improved pedestrian facilities. Based on data in the Draft EIS and the City's Comprehensive Plan, Mill Pond Road has a low incidence of collisions and no reported auto and pedestrian or bicycle collisions. The proposed PCI Plan would re-align and reconstruct the northern portion of Mill Pond Road adjacent to the project entrance. As shown in Final EIS Exhibits 2.3-4 through 2.3-6, the Proposal would construct pedestrian/bicycle paths along this portion of the road. The City is also considering a number of recreational and trail improvements in the area of Mill Pond Road, which could result in an increase in pedestrian activity. Increases in traffic along Mill Pond Road with Planning Area 1 and at buildout are shown in the Draft EIS.

3.11.7. Additional Traffic on Bridges

Comments stated that several bridges are inadequate and that the Draft EIS did not address the impact of project-generated traffic on the Railroad Avenue or Meadowbrook bridges, did not mention the need for a new bridge across the river, and did not identify who would pay for the bridge.

Response:

The traffic analysis accurately accounted for the fact that the existing Meadowbrook bridge is a single-lane bridge with signalized control at both ends. The traffic analysis and level of service (LOS) evaluation considered this two-way staggered and signalized operation by calculating average delays times for future traffic forecast conditions for the No Action Alternative compared to the Proposal and Redevelopment Alternative.

The Draft EIS identifies a new four-lane bridge at SR 202/Railroad Avenue as a necessary mitigation measure for development of Planning Areas 2 and 3 and for background growth

under any of the Draft EIS alternatives. The Draft EIS generally outlines the components of an interjurisdictional process that would need to be implemented to plan, design, and fund a replacement or expanded bridge. It is stated in the Draft EIS that the timing of this process and funding of the bridge are not known at this time.

Federal Highway Administration (FHWA) regulations require periodic inspection of bridges serving public roads. The responsibility for inspection, maintenance, and safety of the Meadowbrook and Railroad Avenue/SR 202 bridges lies with the City and WSDOT, respectively, and not with an individual private applicant for a development project. It is reasonable to assume that the responsible agencies would close bridges that are structurally unsafe to traffic. It is noted that WSDOT received notice of publication of the Draft EIS and did not comment about any potential structural issues with either of the bridges in the study area.

WSDOT constructed improvements to SR 202 and the Snoqualmie River/Railroad Avenue bridge beginning in May 2021. The improvement project included repaving 4 miles of SR 202, and repaving and rehabilitating the bridge. Crews removed the 14-year-old bridge deck, replaced expansion joints, and added a new waterproof membrane to protect the integrity of the bridge. New asphalt and temporary striping was applied before reopening; permanent striping was added during summer 2021.

It is also noted that the inspection report for the Meadowbrook bridge submitted with Comment Letter No. 15D does not indicate that the bridge is structurally deficient. The maintenance and repair issues pointed out in the comment are acknowledged.

3.11.8. Construction Impacts

A comment stated that there is a lack of analysis and mitigation of impacts of construction activity on the study area roadways and intersections. A comment stated that a construction management plan is needed. Additional comments suggested that construction traffic can be greater than full development and occupancy of the site due to dump trucks and pickups having higher weight than vehicles and greater pavement impacts.

Response:

Construction impacts were evaluated further for the Final EIS.

During construction, vehicle trips to and from the Snoqualmie Mill site would be generated by construction workers, delivery of construction materials and equipment, and removal of demolition debris and soils. Demolition and excavation work on the existing site would result in short-term traffic impacts to the surrounding Snoqualmie area. The most noticeable construction-related impacts would be in the form of truck hauling trips, heavy equipment traffic, and street closures or detours. Most of the construction related truck trips are expected to occur during the first 2 years of construction of each planning area. Truck trips are expected to be directed toward the major arterials and regional routes using haul road and Mill Pond Road through the Tokul Road intersection and routed to and from SR 202 or I-90 via Snoqualmie Parkway.

A Construction Management Plan would be developed and implemented to mitigate potential impacts on the local street system prior to beginning construction of each planning area.

Based on information provided by the project engineer, Exhibit 3.11-1 below lists the soil volumes used to estimate the amount and duration of truck traffic required for hauling. For the purposes of these estimates, it was assumed that truck cubic yards (TCY) are equal to 1.3 times bank cubic yards (BCY) and that truck loads average 20 TCY per haul trip. Note that the estimated truck trips shown below are for Planning Area 1 only. Planning Areas 2 and 3 are expected to have similar levels of required haul loads.

Exhibit 3.11-1. Estimated Earthwork and Truck Import Export (Haul Analysis)

Haul Analysis	Total Bank Cubic Yards (BCY)	Truck Cubic Yards (TCY) = BCY x 1.3	Loads = TCY / 20
Import	89,500	116,350	5,818
Export	97,500	126,750	6,338
Total Haul Loads			**12,155**

Source: TENW, 2021.

Permitting agencies often limit the hauling of dirt to weekdays and require that loads be hauled outside of the traditional commuter peak hours. For the purposes of this analysis, it was assumed that the haul loads would occur 8 hours per day, 5 days per week. It is anticipated that truck hauling would take place over 12 months for construction of each planning area. Based on this information, it is estimated that construction impacts would result in approximately 51 trucks per day.

During construction, short-term impacts to portions of Mill Pond Road adjacent to the site may be experienced. These short-term impacts, which could include partial or full closure to background traffic, would result in an increase in traffic volumes on alternate routes such as SR 202. There are no existing transit routes along Mill Pond Road, adjacent to the site, that would be impacted by these short-term impacts.

As identified in the Draft EIS, a Construction Management Plan (including haul route agreements) would be developed, coordinated with the City, and implemented prior to beginning construction of each planning area. Note that the control of dust generated by construction is addressed in the Air Quality discussion in the Draft EIS and that mitigation is proposed.

3.11.9. Impacts to Regional Transportation System

A comment stated there is a lack of information to address traffic-related impacts to the regional transportation system and suggested that the traffic analysis evaluate LOS at the intersections on SR 202 and SR 203. The comment also suggested that AM and PM peak hour LOS be evaluated at all regional intersections impacted by 10 or more peak hour trips generated by the Proposal. King County commented that the Proposal would have a negligible effect on unincorporated roads but requested coordination on traffic management for events.

Additional comments requested additional information about potential traffic impacts through the valley due to congestion at the I-90/SR 18 interchange. One comment expressed concern about the failing condition of the southbound lane on SR 203 north of Carnation.

An additional comment indicated that the ramp intersections at the I-90/SR 18 interchange experience 2-to-3-mile queues, which has led to fatal crashes and extensive delays. It further suggested that the WSDOT-planned construction of a new interchange is tentative.

One comment noted that the I-90/SR 18 interchange experiences tractor/semi-trailer parking during nighttime hours that use the interchange shoulders and requested that this condition be documented and solutions identified as a result of the additional trucking activity to be generated by the Snoqualmie Mill site development.

Response:

The study area and study intersections evaluated in the Draft EIS were identified through scoping discussions with the City of Snoqualmie. No other agencies with jurisdiction or expertise, and no nearby cities or towns responded to the EIS scoping notice, which was published in May 2017. In addition, no other agencies with jurisdiction or expertise commented on the study area used for the transportation analysis. King County's comment that the Proposal would have a negligible effect on unincorporated roads is acknowledged.

City of Snoqualmie traffic impact analysis (TIA) requirements do not apply specific quantitative trip thresholds to identify the study area that should be included in an analysis of future developments. It is acknowledged that trips to and from the site may extend beyond the boundaries of the City, but it is beyond the scope of the EIS analysis to track those trips throughout the region. As noted above, the agencies with jurisdiction for any intersections where volumes may exceed capacity did not identify problems during the EIS scoping process and did not comment on the Draft EIS.

Regarding the potential traffic impacts through the valley due to congestion at the I-90/SR 18 interchange, the new interchange planned by WSDOT is expected to commence construction in 2022, be completed by 2025, and provide additional traffic capacity. The construction of this new interchange is expected to address existing and future travel demands at the interchange, and likely to reduce the potential for traffic that currently travels through the valley to avoid the interchange. Available information from WSDOT indicates that the interchange project is funded and is moving ahead as of August 2021.

Related to the comment on truck parking concerns, overnight truck parking is a reflection of federal driving rules and typically involves long-haul trucks that are partially through their delivery route. There is no reason to suspect that the additional land uses at the Mill site would increase the amount of overnight truck parking anywhere near the vicinity of the project site as federal rules state that a truck driver cannot drive more than 11 consecutive hours since starting their shift or more than 8 hours without a 30-minute break. These 8-hour and 11-hour driving times would suggest that trucks generated by the Mill site would not be parking nearby.

3.11.10. Transit Service

A comment stated that the Draft EIS analysis did not identify existing transit ridership and the capacity of existing transit routes and requested that potential project-related transit ridership be identified. Additional comments suggested that it is speculative to assume that Metro will provide new or expanded service because of new jobs and stated that potential new transit service to the site be identified. A comment stated that the site does not provide access to transit.

Another comment noted that the analysis did not identify existing parking demand and available capacity for the existing park-and-ride lot and did not identify potential park-and-ride use by PCI Plan development.

Response:

It is acknowledged that the Draft EIS did not evaluate the potential reduction in traffic impacts with increased transit use. Instead, the analysis takes a conservative approach and focuses on vehicular traffic impacts to the Snoqualmie area. Identified mitigation measures include promoting transit use; some on-site employers could be subject to commute trip reduction requirements, depending on the size of their workforce. A mitigation measure has been added to the Final EIS that encourages building managers and on-site employers to encourage the use of transit and bicycles. It is acknowledged that the site is not directly adjacent to a transit stop.

King County Metro makes its service decisions based on numerous factors, not just employment. It is acknowledged that it is not certain, and the EIS does not state, that King County Metro will definitely add or expand service to reflect the jobs associated with Snoqualmie Mill. Related to existing transit ridership and capacity, King County Metro's annual System Evaluation did not identify crowding issues on any of the routes in Snoqualmie.

3.11.11. Road Conditions

Comments stated that the regional roadway network serving the site is in a state of disrepair, and in some cases is failing or is generally inadequate. A comment also noted that pavement on some roads is in poor condition and even failing. The comment further suggested that roadways do not meet standards and have relatively high speed limits with fixed objects adjacent to the travel way, and limited shoulders for pedestrians and bicyclists.

Additional comments state that roadways are not designed to accommodate large trucks, there are no shoulders, and in some cases weight limits to protect pavement and unable to accommodate heavy vehicles.

Another comment proposed that a road audit be conducted of every road serving the Snoqualmie Mill site that is impacted by 10 or more peak hour trips, and that the audit should evaluate consistency with King County and WSDOT road standards to address project traffic loadings and pavement condition.

A comment states that the natural design of Mill Pond Road should be preserved.

Response:

The City's adopted Transportation Improvement Program (TIP) includes future projects in the City to improve the roadway at various locations. As part of the proposed PCI Plan, mitigation measures were identified at several intersections to improve LOS. Additionally, as identified in the Draft EIS, Mill Pond Road and the haul road will be upgraded in various phases of the proposed PCI Plan.

The Draft EIS focused on evaluating impacts of the project on intersections and roadways serving the site, including City of Snoqualmie streets in the project study area, and identified specific mitigation measures to mitigate those impacts. The City would have the option and the ability to use part of the estimated fiscal surplus generated by the PCI Plan to help maintain local roads. The roads surrounding the site referenced in the comment are outside the City limits; King County has jurisdiction and responsibility for their condition and maintenance. The comment that some roads outside the City may require maintenance or repair is also acknowledged. It should be noted that an applicant can be required to mitigate for the impacts caused by a proposed project but is not responsible for correcting existing deficiencies.

The proposed design concept for the design of the re-aligned portion of Mill Pond Road is shown in Exhibit 2.3-6 in both the Draft and Final EIS documents and includes substantial landscaping.

3.11.12. Timing and Funding of Improvements

A comment requested more information about improvement projects needed to achieve acceptable LOS. The comment also suggested that funding should be committed and secured prior to permitting development, and that if public funds are unavailable then the applicant should bond for the cost of the improvement prior to permitting. Comments also questioned the data for the Fisher Avenue signal, how the signal will be funded, and how the Proposal's fair share is determined.

Response:

The EIS identifies transportation impacts and improvements that the PCI Plan will need to construct or to contribute a pro rata share toward construction, to maintain acceptable LOS. Pro rata share is generally estimated based on a proposal's proportional contribution of trips, relative to other forecast traffic, to an intersection that is forecast to fall below the applicable LOS standard in an analysis year. Forecast traffic may include other specific development projects and/or background growth. The Proposal's pro rata share of the Fisher Avenue signal was estimated in this manner, and the calculation considered other recently approved projects that would add trips to the failing intersection. Statements about the need for additional signal data are acknowledged.

Appropriate mitigation and fair share responsibilities for improvements to transportation and other infrastructure will be determined by the City Council and integrated in PCI Plan conditions of approval and development agreement. Many of the details mentioned in the comment

regarding funding – such as bonding or other security mechanisms– are specified by code or are at the discretion of the City Council, and would be determined during the land use review process. Such decisions may also be dependent on the future actions of other parties and, therefore, cannot be known at this time or addressed in the EIS. In general, funding sources will be identified in the context of the City's ongoing transportation improvement planning, available funding resources, and the requirements of state law. The Growth Management Act definition of transportation concurrency, for example, identifies when necessary improvements must be in place. In general, funding is not required to be committed or secured before a proposal may be approved; please refer to RCW 36.70A.070 (6)(b).

The Draft EIS acknowledges that widening or replacement of the SR 202 bridge, which would be necessary after Planning Area 1 develops, will involve coordinated planning and design by multiple governments and agencies and a multi-party funding program. Supplemental environmental review would also be required to help plan, locate, and design the new bridge; as noted in the Draft EIS, potential impacts to environmental resources would be evaluated in detail at that time. Those details are not and cannot be known at this time and are not required to be identified in this EIS. Approval of Planning Area 1 is not contingent on that subsequent improvement project. The EIS states repeatedly that the Proposal is being planned and designed in phases, that detailed site planning has not yet occurred for Planning Areas 2 and 3, that the EIS review of those future phases of development is programmatic in nature, and that supplemental SEPA review will occur as plans are developed.

3.11.13. Traffic Impacts Generally

Some comments expressed a general concern about traffic impacts or stated that traffic generated by the project would increase backups and commute times. Another comment suggested that the amount of project-related traffic is uncertain because project land uses are not specified with certainty. Some comments stated that the traffic analysis is inadequate but provided no reason or specifics about such asserted inadequacy. A comment stated that the traffic associated with new jobs was not included in the analysis. A comment expressed a general concern about traffic noise. Another noted that truck traffic would increase on the haul road. A comment questioned whether emergency access during flood events is provided.

Response:

General statements of concern about increased impacts and traffic congestion do not provide specific information on which to base a substantive response and are acknowledged. Similarly, the broad assertion that commute times will increase cannot be tested or verified. The Draft EIS identifies congestion and delay at certain study area intersections as a result of the Proposal, the Redevelopment Alternative, and the No Action Alternative. To the extent that commute times are affected by congestion of the regional road system outside the City, that is beyond the control of the City, is not an impact of the Proposal, and is beyond the scope of the EIS.

Regarding the uncertainty of future land uses, it is common and accepted practice to evaluate trip generation using ITE land use categories for a traffic analysis. The ITE land use categories

provide estimates of trip generation patterns for each category of land use based on observations of numerous built projects of each type. Projected employment was a factor in the analysis. It is neither possible nor necessary for purposes of SEPA compliance for a master plan applicant to know with certainty what specific business operations will occupy planned light industrial space. Master plan proposals are inherently general regarding land uses, particularly at the land use approval stage. Future steps in the City's approval process will require supplemental SEPA compliance and will provide an opportunity to reevaluate trip generation and traffic impacts, if necessary.

It is acknowledged that truck traffic on the haul road would increase with development of Planning Areas 2 and 3; however, truck traffic associated with Planning Area 1 would use an internal roadway to exit the site on the west and to avoid the haul road. Please refer to Exhibit 2.3-4 in the Final EIS and Draft EIS Section 3.11.

A comment identified traffic noise as a concern but did not provide information that would enable a substantive response. Traffic noise is considered in the discussion of noise impacts in Draft EIS Section 3.12 and is also addressed in responses in Section 3.12 of the Final EIS. The proposed PCI Plan would not exceed applicable noise standards according to the analysis.

A comment questioned emergency access during flood events. The Snoqualmie Mill site is located almost entirely within the floodplain and, like the historic portion of City, is subject to periodic flooding. As shown on Final EIS Exhibit 2.3-1, the PCI Plan, the Snoqualmie Mill site would provide points of access to the north, south, and west, and ultimately to the east, which would provide options for egress in the event of a flood event.

3.11.14. Comments Referencing or Incorporating Other Comment Letters

Some comments expressed agreement with the comments contained in Letter 15 (SCAN), Attachment D (DN Traffic) and incorporated those comments by reference.

Response.

Please refer to the responses above to Transportation Comments 3.11.1 through 3.11.12.

3.11.15. Improvements to SR 202

A comment stated that SR 202 needs to be widened because of the Proposal.

Response:

As noted in the Draft EIS, the City has currently programmed several improvements to the SR 202 corridor to address future growth even without the Snoqualmie Mill PCI Plan Proposal (No Action Alternative). The SR 202 Corridor Improvements Phase 3A project would improve lane width and intersection channelization, upgrade underground utilities, and improve and update sidewalks, Americans with Disabilities Act (ADA) ramps, parking access, street lighting, streetscape, traffic calming, underground aerial lines, and pavement rehabilitation from SE Northern Street to the SR 202 bridge. Construction is anticipated to begin in 2022 or 2023. This

would result in widening at the Snoqualmie Parkway signalized intersection #9, but the project is not fully funded.

WSDOT began construction of improvements to SR 202 and the Snoqualmie River/Railroad Avenue bridge in May 2021. The improvement project included repaving 4 miles of SR 202, and repaving and rehabilitating the bridge. Crews removed the 14-year-old bridge deck, replaced expansion joints, and added a new waterproof membrane to protect the integrity of the bridge. New asphalt and temporary striping was applied before reopening; permanent striping was added in summer 2021.

Based on the EIS analysis of the proposed PCI Plan, the SR 202 / Snoqualmie Parkway intersection (intersection #15) is anticipated to operate at LOS E during the AM peak hour with the Proposal at full buildout (2037). Widening of SR 202 to provide one additional through lane in each direction would result in acceptable LOS at the intersection. As noted above, widening is planned as part of the City's 6-year TIP, and Snoqualmie Mill mitigation could include contribution toward this City project.

3.11.16. Weekend & Event Traffic

A few comments addressed weekend traffic, including congestion at roundabouts and the estimates of trips associated with events, indirect impacts, and some non-traffic issues (e.g., noise) related to the outdoor performance center. A comment suggested that the City should coordinate with King County on event management.

Response:

The Draft EIS transportation study is focused on weekday peak hour AM and PM traffic, which is the standard time period used for traffic impact analysis, and the period during which the Proposal would generate the greatest amount of traffic. Some amount of tourism-generated weekend traffic would be associated with winery/tasting room land uses, but the magnitude is expected to be less than weekday AM and PM peak hour traffic. It would likely represent a relatively small increase in the tourism associated with other recreational attractions in the Snoqualmie Valley.

The comment relating to traffic generated by the outdoor performance venue in the Redevelopment Alternative is acknowledged. The assumptions used to estimate traffic are based on documented experience in a similar concert venue and are believed to be reasonable. It should be noted that the outdoor performance center is not part of the proposed PCI Plan but is included in the Draft EIS Redevelopment Alternative for purposes of analysis. The City would coordinate the management of events with King County for this alternative.

The EIS acknowledges that it will be necessary to manage traffic associated with large events at the outdoor performance venue (which is not part of the Proposal), and the City's adopted development regulations, described in the EIS, would address impacts. It is acknowledged, and is described in Draft EIS Section 3.12, that noise associated with some concerts could be significant at some measurement locations. Events conducted in the event center in Planning Area 1 will be

relatively small in scale and would not place significant demands on services or facilities.

A comment stating that the analysis understates indirect impacts may possibly relate to tourism related traffic but is not clear; this comment does not provide sufficient information to enable a substantive response and is acknowledged.

3.11.17. Traffic Impacts to Snoqualmie Falls & the Salish Lodge

A comment stated that the analysis does not address impacts to the parking lots for Snoqualmie Falls or to the Salish Lodge and Spa.

Response:

The EIS analysis identifies impacts to public streets in the City's transportation network, with a focus on congestion and delay at intersections. This is a typical, generally accepted approach to performing traffic analysis for a master plan proposal. It is acknowledged that driveway analysis for the Salish Lodge, and other private/tribal businesses in Snoqualmie, was not conducted. However, since traffic analysis evaluates congestion and delay during peak hour, it would not necessarily coincide with peak hours of activity at the Salish Lodge. The EIS does identify that the Snoqualmie Mill PCI Plan would contribute to tourism in the area; any increase in tourism would likely include visitors to Snoqualmie Falls.

3.11.18. Transportation Comments Not Related to the EIS or the Proposal

A comment questioned the planning, analysis, and cost of the City's planned improvement to the Fisher Avenue signal. Comments questioned the cost and timing of the WSDOT I-90 ramp improvement project. A comment asserted that the City's concurrency management system is inadequate and was not considered in the analysis. A comment questioned who would maintain project streets if the applicant sells the project site.

Response:

The transportation analysis that identified a need for the Fisher Avenue signal preceded the proposed PCI Plan. The planning, design, and cost of this improvement are not issues related to the Proposal or the EIS. The Proposal would, however, contribute a pro rata share of the cost of this improvement based on the traffic it would add to this intersection.

The information in the Draft EIS about the WSDOT I-90 improvement project was provided by WSDOT and was the best information available at the time. Many planned construction projects have been delayed, however, by the pandemic. Current (November 2021) information on the WSDOT website indicates that the planned interchange improvement project is expected to commence construction in 2022 and be completed by 2025. Based on this updated schedule, there would be a gap between the time that Planning Area 1 was assumed to be completed (2023) and completion of the I-90 interchange improvement project (2025). The Snoqualmie Mill project's contribution to the intersection would be relatively small (approximately 100 peak hour trips, 4–5% increase), but this timing would mean added congestion to an interchange that is currently operating at an unacceptable LOS during the AM

peak hour. This added congestion is not considered a significant impact because of the short duration and the relatively minor scale of the additional traffic. The impact is also considered to be unavoidable in view of the planned schedule for WSDOT's improvement, and the fact that the I-90 improvement is outside of the control of either the City or applicant. GMA's rule for transportation concurrency requires that needed improvements must be funded or in place within 6 years of development (RCW 36.70A.070 6(vii) (b)); the current estimated timing of Snoqualmie Mill Planning Area 1 construction and I-90 interchange construction and mitigation of any temporary impact would fall within the 6-year period.

The comment asserting that the City's concurrency system is inadequate is acknowledged as the opinion of the commenter. The EIS appropriately analyzes the impacts of the Proposal within the parameters of existing plans, programs, and regulations.

A comment speculating about a potential future transfer of ownership is acknowledged but does not involve any analysis in the EIS. Chapter 2 of the EIS does note that streets internal to the Snoqualmie Mill site would be private and would be constructed and maintained by the property owner.

3.12. NOISE

Almost all comments addressing noise issues relate to noise generated by concerts and associated traffic at the outdoor performance center. Comments are predominantly general expressions of concern about noise impacts, or statements of opposition to the concert venue. A few comments stated that the noise levels would violate Department of Health noise standards, while another acknowledged that the City code would control noise and other details of outdoor performances. One comment disagreed with the specific noise levels estimated to be generated by outdoor concerts. A few comments stated that traffic-generated noise increases would be too great.

Response:

The great majority of noise-related comments are general in nature and scope and express opposition to the outdoor performance venue. These expressions of opposition are acknowledged. It should be noted, as stated in Chapter 2 of the Draft EIS, that the outdoor performance center is *not a part of the proposed PCI Plan* and is included in the Redevelopment Alternative only for the purpose of analysis.

Environmental noise limits in Washington State are promulgated by Ecology, but these may be modified by local regulations; no separate standards of the Department of Health have been identified. The City of Snoqualmie has adopted King County's noise standards by reference (SMC 8.16.050), and King County's standards (King County Code [KCC] 12.86) are used in the Draft EIS noise analysis.

The comment disagreeing with the calculated noise levels for outdoor performances misinterprets the applicable tables in Section 3.12 of the Draft EIS; the table on page 3-325 identifies typical sound levels for a variety of activities, while the table on page 3-338 identifies the range of increase in sound levels over background levels at various measurement locations, which are at various distances from the performance venue. The 3 decibel (dB) increase noted in the comment is at the low end of a range of increase that reaches 20 dB in some locations.

Sound level measurement (SLM) locations used for the analysis, shown in Draft EIS Exhibit 3.12-5, were identified adjacent to and surrounding the Snoqualmie Mill site. SLMs 1 and 2 were located north and east of the site, respectively. Sound generally decreases with increasing distance, depending on line-of-sight, topography, vegetation, and other factors.

3.13. PUBLIC SERVICES

3.13.1. Police, Fire, & Schools

Comments relating to Public Services generally stated that more detailed information was needed regarding impacts to various services (police fire, schools); that some aspects of specific services, or some types of services were not considered (hospitals); that the analysis for the Proposal and Redevelopment Alternative was not sufficiently detailed; that mitigation was not sufficient and that additional equipment was needed (e.g., a ladder truck); and questioned who would pay for improvements and when they would be provided. Some comments stated that additional data are needed by various City departments (e.g., data on police service calls from commercial development), and that some existing services are deficient (police). A comment stated that public services would be disrupted during floods.

Response:

The statement that police call data specific to commercial development are lacking is acknowledged. As noted in Draft EIS Section 3.14, Snoqualmie Police Department (SPD) call data are not categorized by type of use. This is true for many police departments across the state. Where police departments have adopted quantitative level of service standards, they are typically related to population growth. The Draft EIS discussion acknowledges (on page 3-375) that the population-based ratio used to estimate staffing needs may not fully account for the demand generated by an employment-based development proposal. At the same time, commercial and industrial uses typically generate fewer calls for service compared to residential uses. In discussions with the EIS consultant, the Snoqualmie Police Chief did adjust the initial EIS estimate of future staffing needs upward to account for planned PCI Plan employment (refer to page 3-384 of the Draft EIS).

In regard to a comment about the Coalition of Small Police Agencies, the police service analysis only noted the existence of the Coalition, but it did not reduce estimated demand or otherwise assume that the Coalition would provide service to the Snoqualmie Mill site.

The cost of additional equipment for the Police and Fire Departments was considered in the Fiscal Analysis (Section 3.16 of the Draft EIS). Regarding necessary equipment, a review of meeting notes indicates that the Fire Department expressed uncertainty in conversations with the EIS consultants as to whether a ladder truck would be needed and suggested that a "shared" apparatus could be necessary depending on the approved building heights. Chapter 2 of the Draft EIS notes that for some buildings, the PCI Plan includes a proposed height deviation to up to 60 feet measured to the mid-point of the roof/70 feet to the peak. In view of this expressed uncertainty, the Final EIS has added a mitigation measure in Chapter 1 to require additional consultation with the Fire Department.

Comments regarding service needs that could be generated by concerts or events at the outdoor performance center are acknowledged. The EIS evaluates impacts consistent with the general level of detail available for this hypothetical facility. It should be noted that the concert venue is not part of the proposed PCI Plan; it is a speculative use that was included in the

Redevelopment Alternative solely for purposes of analysis. There is, therefore, no potential operator who could provide more detailed plans or operational information. The Chateau Ste. Michelle facility in Woodinville is of comparable size and was reasonably used as a general model to estimate potential impacts. The Police Service analysis also notes that the City regulates special events (see SMC 12.20) and that the Snoqualmie Police and Fire Departments would be involved in permitting.

Several comments stated that anticipated additional service demands, such as those related to concerts at the facility in the Redevelopment Alternative, should be addressed before the actual impacts occur. Those comments are noted but do not reflect pragmatic, financial, or legal requirements for requiring and implementing mitigation. The timing of improvements to mitigate impacts depends on a number of considerations; these include the phasing/timing of development activity and when the identified need would actually occur; who is responsible for the improvement (e.g., City or applicant) and in what proportion; and when costs and anticipated revenues accrue to the City. As demonstrated in the Draft EIS Fiscal Analysis, Section 3.16, the PCI Plan is projected to generate a positive fiscal balance that would be available for use by the City to address public service needs, subject to City Council discretion and budgetary priorities. Refer to the additional Final EIS responses to comments on fiscal and economic issues (Final EIS Section 3.15).

State law is also relevant to the question of timing for transportation facilities. Road improvements and some other facilities are subject to GMA "concurrency" requirements, which do not require and may not result in improvements being constructed prior to occurrence of a projected impact; see RCW 36.70A.070 (6)(C)(vii)(b) and WAC 365-196-840(2) and 365-196-415(5).

In response to comments regarding the accuracy or timeliness of data used in the analysis, the EIS relied on the most complete, reliable, and current data available at the time the analysis was prepared, including personal communications with departmental staff. General statements that the data, analysis, or level of detail is insufficient are acknowledged as the opinions of the commenters; a more substantive response is not possible. Comments regarding the quality or sufficiency of existing services are not related to the EIS and are noted without further response.

Regarding comments that identify public services that are not addressed in Draft EIS Section 3.14, the Draft EIS evaluates all public services that were identified through the scoping process; please refer to Response 3.1.2 (5).

A comment stating that public services would be disrupted during floods is acknowledged. The Snoqualmie Mill site is located almost entirely in the floodplain, as is the historic portion of the City of Snoqualmie. It is acknowledged that periodic flooding disrupts service delivery, transportation systems, and many activities of daily life. Note that the PCI Plan is being designed to achieve no net increase in flood elevations; please refer to Draft EIS Section 3.3, beginning on page 3-80.

3.13.2. Parks/Snoqualmie Valley Trail

Comments raised questions about access to the Snoqualmie Valley Trail from the Snoqualmie Mill site; land use compatibility between urban and rural activities; potential impacts to King County parks and trails; limiting access to private property south of the site; and the access easement across the eastern hillside.

Response:

(1) Access to the Snoqualmie Valley Trail (SVT)

A comment stated that the PCI Plan should identify access to the Snoqualmie Valley Trail (SVT) from Planning Area 1. It is acknowledged that the Snoqualmie Mill site Pre-Annexation Agreement, which is discussed in Section 2.2 of the Final EIS and Section 3.7 of the Draft EIS, requires the applicant to dedicate land for the missing link of the SVT and to work with King County to identify access to the trail. However, access can be determined most appropriately after the alignments of the missing segments are determined by King County. Currently, the Planning Area 1 design includes pedestrian access to Mill Pond Road, which in turn provides access to the existing SVT; please refer to Exhibit 2.3-4 of the Draft and Final EIS documents. Access from the northern portion of Planning Area 1 would be constrained by wetlands, heavy vegetation, and by the private haul road; the haul road carries heavy truck traffic and is not safe for pedestrian use. The PCI Plan identifies future pedestrian connections travelling east across the site, through Planning Areas 2 and 3. Draft EIS Exhibit 3.13-6 shows a possible connection to the SVT, across King County's hillside property in the general location of an access easement. Master planning for Planning Areas 2 and 3 is still conceptual, and specific trail corridors cannot be identified with greater specificity at this time. The applicant will work with King County, as plans for the SVT and the master plan are developed, to determine appropriate access.

(2) Land Use Compatibility

A comment questioned the compatibility between a rural trail and an urban industrial development, the potential for tall buildings to be located near the trail, and the need for mitigation. The Draft EIS Land Use analysis (Section 3.6.2, page 3-160) describes compatibility issues between land uses of different intensity, and between the site and adjacent rural uses, including the King County-owned property. The Draft EIS does not identify significant adverse land use impacts or a need for mitigation. Possible disagreement with this conclusion is acknowledged. It should be recalled that the Snoqualmie Mill site was an operating industrial facility for almost 100 years. Any asserted conflict between intensive industrial uses on the Snoqualmie Mill site and surrounding rural uses would be both a continuation of historic conditions and land use patterns, and a reflection of the site's location on the boundary of a City/UGA and King County's designated rural area. Heavy industrial uses are not permitted by applicable zoning and are not proposed. As evaluated in the Draft EIS, noise levels would also be within applicable standards; refer to Draft EIS Section 3.12, Noise. Proposed buildings in Planning Area 1 would be of the same general scale as those that have historically existed on other portions of the site. As discussed in Draft EIS Section 3.7, Consistency with Plans and

Policies, the Proposal is also consistent with the City of Snoqualmie land use and zoning designations for the site and the Mill Planning Area. Views from the King County-owned property north of Planning Area 1, which could contain a new segment of the SVT, would be separated from the site by a large wetland area, existing vegetation, and the private haul road; visual impacts would not be significant. Planning Areas 2 and 3 have not been planned or designed in sufficient detail to identify building locations or determine how close they would be to the SVT alignment. But as noted previously, historic, large (and readily visible) industrial buildings currently occupy those locations. An opportunity to address potential impacts and mitigation related to Planning Areas 2 and 3 would occur in a subsequent stage of environmental review; please refer to Final EIS Section 2.2 and Final EIS Section 3.1.2 for additional information about phased environmental review.

(3) Increased Use Levels for Trails and Parks

A comment stated that the Proposal would increase the use of adjacent King County trails and parks and questioned how this impact would be mitigated. As identified in Draft EIS Section 3.8, Population, Housing, and Employment, the PCI Plan would result in an estimated increase of 304 people and 3,410 jobs by 2032. The projected population increase is not expected to result in a significant impact to County parks and trails; refer to Draft EIS Section 3.13, Parks. The estimated increase in jobs by 2032 is substantial, but employees do not typically impact the use of parks and trails significantly. The EIS concludes that mitigation is not warranted for these incremental impacts. It is acknowledged that the PCI Plan could indirectly contribute to an increase in tourism to the Snoqualmie area, which could indirectly result in some increase in the use of County parks and trails; this impact cannot be quantified, however.

(4) Access to Adjacent Properties

The PCI Plan and development of the Snoqualmie Mill site would prevent access to Borst Lake and other private properties adjacent to the site. King County's interest in acquiring these properties for park use is acknowledged. However, if the County or the adjacent property owners desire to limit public access to this property, it would seem more appropriate for these parties to construct a fence. This is not viewed as an impact or responsibility of the PCI Plan.

(5) Access Easement and Trail Crossing

A comment noted the presence of a recorded access easement across the eastern hillside and requested that it be portrayed in the EIS. The comment also noted that the design of the access road and trail crossing are subject to King County approval. These comments are acknowledged. The applicant retained this access easement when it sold the eastern hillside property to King County in 2015. The easement could also allow provision of future access to the Snoqualmie Valley Trail depending on the alignment of the missing trail segment, which has not been determined. The general location of the easement and the potential future trail connection are shown on Exhibit 2.3-4 in the Draft and Final EIS documents and Exhibit 3.6-2 in the Draft EIS. The requirement to work with King County on the design of the access is acknowledged in the Draft EIS (see Section 3.13, page 3-354).

3.14. UTILITIES

Several comments relating to water stated that the water supply for Planning Areas 2 and 3 was not addressed or is not adequate, that City water is overallocated, or that additional water rights are needed. A comment expressed disagreement with EIS conclusions regarding water demand. Comments also stated that the City's water plan is outdated or expired, and that the water and sewer plan updates are uncertain but should be required. One comment questioned whether water for the Proposal will come from the City system or on-site wells. A comment questioned the effect of increased tourism on water use. Comments on wastewater noted the need and associated costs to upgrade wastewater facilities to support proposed wineries.

Response:

Draft EIS Section 3.15 (Utilities) noted that the City was in the process of updating its water and wastewater comprehensive plans; that update process continues as of this writing. The Draft EIS evaluated water and wastewater supply and demand based on both the currently adopted utility plans and the emerging updated plans. Preliminary information on the direction being pursued in the draft water and wastewater plan updates was provided by the City and its consultants and was included in the Draft EIS. The Draft EIS identifies that information as preliminary; no additional details are available at this time.

Regarding water supply, the Snoqualmie Mill site is currently within the City's water service area; its population and employment will be included in the supply/demand estimates in the updated plan. Information available at this time – in both the adopted and preliminary updated water plans – indicates that the City has sufficient water to supply development of Planning Area 1. The City will, however, need to obtain additional water supply to support future planned growth, including Planning Areas 2 and 3. The statement that the current water comprehensive plan has expired is noted, but is not accurate. 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. Public review of the updated utility plans is expected to begin in the near future.

The Proposal will purchase its water from the City and will not rely on on-site wells. The growth in tourism, directly or indirectly, generated by the Proposal cannot be reliably quantified at this time; similarly, indirect water use associated with this growth cannot be quantified.

As to wastewater utility issues, the Draft EIS identifies the direction of the wastewater system plan update currently being prepared, based on information provided by the Public Works Department and the consultants updating the utility plans.

The emerging draft wastewater plan update expresses a preference for upgrading the WWTP to expand capability to handle solids and organic loading, rather than pre-treating wastewater from wineries prior to conveyance to the City's WWTP. The Proposal would contribute to WWTP upgrade. The Proposal would also implement the BMPs identified in Ecology's Winery General Permit, which include the removal of solids, control of organic loads, maintenance of the waste management system, and improving water efficiency.

3.15. FISCAL & ECONOMIC IMPACTS

Comments on fiscal and economic issues fall into a number of categories, which are addressed below. Comments stated that additional retail uses were not needed or not feasible, or that the Proposal was required to demonstrate a need for additional retail uses. Several comments stated that competition and negative effects on downtown businesses and salaries should be analyzed. A comment stated that increased costs of road maintenance should be considered. A comment stated that who pays for infrastructure is not clear. A few comments asserted that the projected revenue in the fiscal study was overly optimistic, and that a worst-case outcome should be analyzed. A comment also stated that the analysis indicated that revenue from the project would be insufficient until most of the project was completed. Comments stated that growth does not pay for itself and that more detail on the economic benefits of the Proposal should be provided. Comments stated that some costs were not assessed in the analysis, including police costs and transportation costs. A comment stated that indirect economic costs would occur to the Snoqualmie Indian Tribe, mentioning traffic, which it asserted would affect operations of the Salish Lodge and Spa.

3.15.1. Need/Viability of Retail

Response:

Comments to the effect that additional retail uses are “not needed” or “not viable” reflect the opinion of the commenter and are acknowledged.

The Snoqualmie Mill site is designated and zoned for commercial/industrial use. The PCI zoning classification allows a wide range of commercial and retail uses as outright permitted uses, and a few, including restaurants, as conditional uses; see SMC 17.55.020, Table 1. No provisions have been identified in the Comprehensive Plan or zoning code that require an applicant to study, demonstrate, prove, or otherwise justify a need or market for any uses proposed in a land use application.

Similarly, SEPA does not require any such study or demonstration. The SEPA Rules specifically exclude evaluation of economic impacts from consideration in an EIS, along with information relating to economic competition, profits, methods of financing proposals, and socioeconomic impacts (WAC 197-11-448, 197-11-450). While this type of information may be considered by decision makers, it is not required to be included in an EIS. It is noted that the EIS does contain analysis of fiscal and economic impacts (Section 3.16); this analysis is permitted by the City’s SEPA regulations for purposes of providing information but not for any other purpose (SMC 19.04.170). The SEPA scoping process for the Snoqualmie Mill PCI Plan EIS did not identify socioeconomic impacts for detailed analysis in the EIS.

3.15.2. Competition/Effect on Downtown Businesses

Response:

Comments relating to economic competition are outside the scope of an EIS, pursuant to WAC 197-1-1-448 and 197-11-450, and are acknowledged; see Response 3.15.1 above. Please also see Section 3.16 of the Draft EIS, which indicates that the Proposal would have a positive effect on local tourism and business activity.

3.15.3. No Economic Benefit to the City

Response:

The comment that the Proposal would not generate an economic benefit is acknowledged as the opinion of the writer. Please refer to Draft EIS Section 3.16, Fiscal and Economic Impacts, however, which identifies substantial net positive fiscal and economic impact surpluses to the City. The fiscal surplus to the City, after accounting for costs, is estimated at approximately $1.5 million annually; indirect economic benefits to the local economy from employment and tourism spending would accrue to the City as well.

3.15.4. Cost of Growth

Response:

As a generalization, the proposition that "growth does not pay for itself" may or may not be accurate in a given locality and with respect to a specific development proposal, depending on numerous variables. Factors that could affect whether or not growth pays for itself depends on, among other things, the type of growth being considered (e.g., residential, commercial, or industrial); state and local planning requirements and regulatory programs; the existing and planned adequacy of infrastructure; local fiscal and economic conditions; and whether the city experiencing growth assesses fees and charges and imposes mitigation requirements that are adequate to address the public service and infrastructure costs associated with development.

3.15.5. Worst-Case Analysis

Response:

The purpose of the Fiscal Analysis is to identify likely costs and revenues accruing to the City from the Proposal; it is intended to be a reasonable projection, not a worst-case or best-case analysis. SEPA generally does not require a Final EIS to include a worst-case analysis; such analysis is required only in very limited situations, which do not apply to the present situation. Please refer to WAC 197-11-080. The comment stating that revenue from the project would be insufficient, and impacts would be adverse until most of the project was completed, is not consistent with the analysis and reflects the opinion of the commenter. The Fiscal Analysis indicates that Planning Area 1, assumed to be completed in 2025, would generate a fiscal surplus of $7.4 million by buildout; please refer to Exhibit 3.16-12 in the Draft EIS. It is

acknowledged that some other "benefits" of the Proposal, such as increased employment and tourism spending, are discussed at a more general level in the analysis. These are considered indirect benefits, while the Fiscal Analysis focuses on direct costs and revenues.

3.15.6. Indirect Impacts

Response:

The concerns expressed in the Snoqualmie Indian Tribe's comment about potential impacts to the Salish Lodge are acknowledged. The Fiscal Analysis is focused on costs and tax revenues that would accrue directly to the City of Snoqualmie; other governmental entities were not addressed.

The comment asserting adverse cost impacts to the Tribe is speculative, involves indirect costs, and is beyond the scope of the analysis. The SEPA Rules specifically exclude effects on competition and salaries and financing of proposals from consideration in EIS documents; please refer to WAC 197-11-448. In regard to payment for infrastructure, project proponents are generally required to mitigate the impacts caused by their proposals and to pay a proportional share of improvements. To the extent that the general public contributes to the need for and benefits from an improvement, the public may also pay a share of an improvement. The costs of road maintenance were not raised in scoping comments and were not evaluated in the Fiscal Analysis. Police costs are included in the analysis; please refer to Draft EIS Exhibit 3.16-8. It is acknowledged that the costs of transportation improvements and other capital costs are not identified in the Fiscal Analysis.

3.16. COMMENTS THAT REFERENCE, REITERATE, OR INCORPORATE OTHER COMMENT LETTERS AND/OR ATTACHMENTS

Several comments referenced, reiterated, or incorporated other comment letters and/or attachments that were submitted by other commenters (primarily those submitted by SCAN) on various topics.

Response:

The commenters are referred to the responses to the comments that are referenced, reiterated, or incorporated in their letters.

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5.0 Abbreviations

AADT	annual average daily traffic
ADA	Americans with Disabilities Act
ADD	average daily demand
ADF	average daily flow
ADT	average daily traffic
AESI	Associated Earth Sciences, Inc.
AG	Attorney General
AIP	Post Annexation Implementation Plan
ALS	advanced life support
AMI	area median income
ASCE	American Society of Civil Engineers
AST	above ground storage tank
AVO	average vehicle occupancy
B&O	Business & Occupation Tax
BACT	Best Available Control Technology
BCY	bank cubic yards
BE	Biological Evaluation
BFE	base flood elevation
bgs	below ground surface
BMPs	best management practices
BO	Biological Opinion
BOD	biological oxygen demand
BOD_5	5-day Biological Oxygen Demand
CAO	Critical Areas Ordinance
CARA	Critical Aquifer Recharge Area
CC&R	Covenants, Conditions, and Restrictions
CFP	Capital Facilities Plan
CFR	Code of Federal Regulations
CIG	Climate Impacts Group
CIP	capital improvement program
CMZ	channel migration zone
CO	carbon monoxide
CO_2	carbon dioxide
COE/Corps	U.S. Army Corps of Engineers
CPPs	Countywide Planning Policies
CPT	cone penetrometer test
CSWPPP	Construction Stormwater Pollution Prevention Plan
CWA	Clean Water Act
cy	cubic yard
DAHP	Washington State Department of Archaeology and Historic Preservation
dB/dBA	decibel/A-weighted decibel
DDES	King County Department of Development and Environmental Services
DDI	divergent diamond interchange
DOH	Department of Health

DPS	Distinct Population Segment
DRO	diesel-range organics
Ecology	Washington State Department of Ecology
Ecology Manual	Department of Ecology Stormwater Manual for Western Washington
EIA	effective impervious area
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ERU	equivalent residential unit
ESA	U.S. Endangered Species Act
ESU	Evolutionarily Significant Unit
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTE	full time equivalent
GHG	greenhouse gas
GLA	gross leasable area
GMA	Washington State Growth Management Act
GMPC	Growth Management Planning Council
GMU	Game Management Unit
gpd	gallons per day
gpm	gallons per minute
GRO	gasoline-range organics
GSP	General Sewer Plan
HABS	Historic American Buildings Survey
HAWK	high intensity activated crosswalk signal
HCM	Highway Capacity Manual
HDPE	high density polyethylene
HPA	Hydraulic Project Approval
HVAC	heating, ventilation, & air conditioning
I-90	Interstate 90
IBC	International Building Code
IDA	International Dark-Sky Association
ILA	Interlocal Agreement
IPCC	Interstate Panel on Climate Change
ITE	Institute of Transportation Engineers
JACL	Japanese American Citizens League
JCCCW	Japanese Cultural and Community Center of Washington
JD	Jurisdictional Determination
KCC	King County Code
KCSWDM	King County Surface Water Design Manual
LEED	Leadership in Energy and Environmental Design
LiDAR	Light Detection and Ranging
LOMR	Letter of Map Revision
LOS	Level of Service
LWD	large woody debris
MDP	Master Drainage Plan
MEV	million entering vehicles
mg	million gallons

mgd/MGD	million gallons per day
MP	milepost
mpg	miles per gallon
mph	miles per hour
MSAT	Mobile Source Air Toxics
MTCA	Model Toxics Control Act (WAC 173-340)
$MTCO_2e$	metric tons of CO_2 equivalent
MVET	Motor Vehicle Excise Tax
NAAQS	National Ambient Air Quality Standards
NAVD 88	North American Vertical Datum of 1988
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NGVD 29	National Geodetic Vertical Datum of 1929
NIBRS	National Incident-Based Reporting System
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NORCOM	North East King County Regional Public Safety Communication Agency
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWF	North Well Field
NWI	National Wetlands Inventory
OFM	Washington State Office of Financial Management
OHWM	ordinary high water mark
OPMA	Open Public Meetings Act (RCW 42.30)
ORO	oil-range organics
OS-2	Open Space
OSHA	Occupational Safety and Health Administration
PA	Planning Area
PAHs	polycyclic aromatic hydrocarbons
PCI	Planned Commercial/Industrial
PDD	peak daily demand
PGIS	pollution-generating impervious surface
ppm	parts per million
PRA	Public Records Act (RCW 42.56)
PROS	Snoqualmie Parks, Recreation & Open Space Plan
PSCAA	Puget Sound Clean Air Agency
PSE	Puget Sound Energy
PSRC	Puget Sound Regional Council
PTR	Permanent Traffic Recorder
PUD	Planned Unit Development
RCW	Revised Code of Washington
REET	Real Estate Excise Tax
RMF	Rattlesnake Mountain Fault Zone
ROW	right-of-way
RTP	Regional Transportation Plan
SCS	U.S. Soil Conservation Service

SEPA	State Environmental Policy Act (RCW 43.21C)
sf	square foot/feet
SFD	Snoqualmie Fire Department
SFLCo	Snoqualmie Falls Lumber Company
SLM	sound level measurement
SMA	Shoreline Management Act
SMC	Snoqualmie Municipal Code
SMP	Shoreline Master Program
SMV	Snoqualmie Mill Ventures LLC
SPD	Snoqualmie Police Department
SPT	standard penetration test
SR	State Route
SSA	sewer service area
SVHM	Snoqualmie Valley Historical Museum
SVOC	semivolatile organic compound
SVSD	Snoqualmie Valley School District
SVT	Snoqualmie Valley Trail
SWF	South Well Field
SWPPP	Stormwater Pollution Prevention Plan
TAZ	Traffic Analysis Zone
TCP	Traditional Cultural Property
TCY	truck cubic yards
TDM	Transportation Demand Management
TESC	Temporary Erosion and Sedimentation Control
TIA	traffic impact analysis
TIP	Transportation Improvement Program
TMC	turning movement count
TMDL	Total Maximum Daily Load
TMP	Transportation Management Plan
TNM	Traffic Noise Model
TOD	Transit-Oriented Development
TOT	time of travel
TSP	total suspended particulates
TSS	total suspended solids
UDP	Unanticipated Discovery Plan
UGA	Urban Growth Area
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
V/C	volume to capacity ratio
VCP	voluntary cleanup program
VMT	vehicle miles traveled
WAC	Washington Administrative Code
WASIST	Washington State Intersection Screening Tool
WASPC	Washington Association of Sheriffs and Police Chiefs
WDFW	Washington Department of Fish and Wildlife
WHR	Washington Heritage Register

WISAARD	Washington Information System for Architectural and Archaeological Records Data
WISHA	Washington Industrial Safety and Health Act
WLA	Waste Load Allocation
WOTUS	Waters of the U.S.
WRF	Water Reclamation Facility
WSA	water service area
WSDOT	Washington State Department of Transportation
WSE	Watershed Science and Engineering
WSP	Water System Plan
WWHM	Western Washington Hydrology Model
WWP	Wastewater Facilities Plan
WWTP	wastewater treatment plant

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6.0 Distribution List

6.1. AGENCY, TRIBAL, AND ORGANIZATION CONTACTS

Bricklin and Newman, LLP
Century Link
City of Carnation
City of Covington
City of Duvall
City of Issaquah
City of Maple Valley
City of North Bend
City of Redmond
City of Sammamish
Federal Emergency Management Agency (FEMA)
Japanese American Citizens League
Japanese Cultural and Community Center of Washington
King County Department of Local Services, Permitting Division
King County Department of Local Services, Road Services Division
King County Department of Natural Resources and Parks
King County Historic Preservation Program
King County Library System
Muckleshoot Indian Tribe
National Marine Fisheries Service (NMFS)
Port of Seattle
Puget Sound Clean Air Agency (PSCAA)
Puget Sound Energy (PSE)
Puget Sound Partnership (PSP)
Puget Sound Regional Council (PSRC)
Rainier Audubon Society
Snoqualmie Community Action Network (SCAN)
Snoqualmie Tribe
Snoqualmie Valley Preservation Alliance
Snoqualmie Valley School District #410
Snoqualmie Valley Watershed Improvement District
Snoqualmie Watershed Forum
State of Washington Energy Facility Site Evaluation Council (EFSEC)
Tulalip Tribes
U.S. Army Corps of Engineers - Seattle (USACE)

U.S. Fish and Wildlife Service (USFWS)
Washington Department of Archaeology and Historic Preservation (DAHP)
Washington Department of Fish and Wildlife (WDFW)
Washington State Department of Agriculture (WSDA)
Washington State Department of Commerce
Washington State Department of Corrections (DOC)
Washington State Department of Ecology (Ecology)
Washington State Department of Health (DOH)
Washington State Department of Natural Resources (DNR)
Washington State Department of Social and Health Services (DSHS)
Washington State Department of Transportation (WSDOT)
Washington State Parks and Recreation Commission
Washington Trust for Historic Preservation

6.2. INTERESTED PARTIES

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Armstrong, Elaine
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Balmer, Ike
Baradat, Helene
Bennett, Josh
Berg, Maria Cristina
Berger, Don
Berger, Suzy
Berkebile, Cody
Bolt, Carson
Boranian, Anna
Brandenburg, Jill
Bray, Chad
Bray, Courtney
Bryant/Waedock
Bucy, Sheri
Callahan, Maura T.
Capps, Carter
Cassady, Philip
Cernak, Kristin
Christensen, Julie

Coffing, Chris
Confield, Aiko Mizumori
Demetrick, Thyra
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DiTrani, Bobby
Donaldson, William
Edmunds, Steve
Eggleston, Aaron
Eggleston, Karen
Eiffert, Dave
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Ericson, Erin
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Fels, Patricia
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Fletcher, Fuzzy
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Gernak, Kristin
Gil, Antonio
Giorello, Daniel
Grant, Rick
Gray, Robin G.
Greenhaw, Elizabeth
Hamerly, Shawn
Harper, Dawn
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Hu, Henry
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Huntley, Kristina
Insalaco, Sam
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Iverson-Stinson, Christine
Johnson, Annie McElroy
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Kipp, Gregory
Kosche, Amy
Kramer, Rachel
Krass, Cynthia

Lake, Julie
Lee, Emily
Lingo, Kim
Linney, Lacey
Llewellyn, David
Loveless, Maxine
Lowney, Monica
Lux, Sharilyn
Meador, Karen
McCann, Rob
McCarty, Janelle
McCarty, Mike
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Nelson, Robert
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Nold-Glaser, Jeff
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Petersen, Amelia
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Rich, Amanda
Ross, Michael
Rossiter, Andrew
Rupert, Bobbe
Ruppert, Karen
Russell, Wayne
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Schneider, Kathleen
Shepard, Peggy
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Simpson, Carolyn
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Sotelo, Anna
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Surmann, Kornelia
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Tabakci, Kolbi
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Tevis, Sandra
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Thomas, Wendy
Trostel, Xandra
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Vega, Brissa
Vega, Sierra
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Wentink, H.
Wheatley, Sarah
Wilkins, Riley
Williams, Natalie
Williamson, Andrea
Williamson, Haley
Williamson, Phillip
Wilson, Darcy
Wood, Teri
Wood, Tom