PORT OF EVERETT:
AMENDMENT TO COMPREHENSIVE SCHEME OF HARBOR IMPROVEMENTS

FOR

RIVERSIDE BUSINESS PARK

Port of EVERETT

RECEIVED
APR 06 1999
DEPT. OF ECOLOGY

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

FINAL SEIS

April 6, 1999

TABLE OF CONTENTS

RECEIVED
APR 06 1999
DEPT. OF ECOLOGY

PART 1

Fact Sheet

CHAPTER 1 - SUMMARY **I-1**

1.1 PROPOSED ACTION I-1
1.2 OBJECTIVES OF THE PROPOSAL I-7
1.3 PROJECT HISTORY I-7
1.4 SUMMARY OF ALTERNATIVES I-8
1.5 SIGNIFICANT AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED I-15
1.6 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATING MEASURES I-16

CHAPTER 2 - PROPOSED PROJECT AND ALTERNATIVES **II-1**

2.1 DESCRIPTION OF PROPOSAL **II-1**

2.1.1 NAME OF PROPOSAL II-1
2.1.2 PROPOSED PROJECT SPONSORS II-1
2.1.3 PROPOSED PROJECT LOCATION II-1
2.1.4 PRINCIPAL FEATURES OF THE PROPOSED PROJECT II-1
2.1.5 BENEFITS/ADVANTAGES OF DELAYING IMPLEMENTATION II-2

2.2 ALTERNATIVES **II-3**

2.2.1 ALTERNATIVE 1 - NO WATER-DEPENDENT USES II-3
2.2.2. ALTERNATIVE 2 - SINGLE, WATER-DEPENDENT USER AND BUSINESS PARK II-3
2.2.3 ALTERNATIVE 3 - NO ACTION II-4

CHAPTER 3 - ERRATA SHEET **III-1**

PART 2

Comments and Responses

List of Figures

FIGURE 1: PROJECT LOCATION I-3
FIGURE 2 - PROPOSED PROJECT SITE PLAN I-5
FIGURE 3: CONCEPTUAL SITE PLAN - ALTERNATIVE 1 ..... I-9
FIGURE 4: CONCEPTUAL SITE PLAN - ALTERNATIVE 2 ..... I-11
FIGURE 5: NO ACTION ALTERNATIVE I-13

List of Tables

TABLE 1: MATRIX I-17

PART 1

FACT SHEET

PROPOSED ACTION:

The proposed action is an amendment to the *"Port of Everett Comprehensive Scheme for Harbor Improvements"* to approve a master plan for the 78 acre site to be known as Riverside Business Park. The project proposes redevelopment of an old lumber processing site ("Weyerhaeuser East") to provide approximately 1.35 million square feet of industrial, manufacturing and warehouse space, associated roads, and utilities.

LOCATION:

The proposed Riverside Business Park project site is located along the west bank of the Snohomish River, beginning approximately 250 feet south of the SR 529 bridge and extending southerly to within 1,800 feet of the Interstate 5 bridge, in Everett, Washington.

PROJECT PROPONENT AND LEAD AGENCY:

Port of Everett
P.O. Box 538
Everett, WA 98206

RESPONSIBLE OFFICIAL:

Mr. John Mohr, Executive Director
Port of Everett
P.O. Box 538
Everett, WA 98206

CONTACT PERSON:

Mr. Robert McChesney
Port of Everett
P.O. Box 538
Everett, WA 98206
(425) 259-3164
Fax: (425) 252-7366
bobm@portofeverett.com

DEVELOPMENT MANAGER:

Mr. Peter Crolius
Trammell Crow
1687 114th Avenue SE, Suite 250
Bellevue, WA 98004
(425) 519-6348
Fax: (425) 454-7184
crolius@trammellcrow.com

AUTHORS AND PRINCIPAL CONTRIBUTORS:

This FSEIS has been prepared under the direction of Trammell Crow on behalf of the Port of Everett. Additional research and analysis was provided by:

Reid Middleton, Inc. 728 134th Street SW, Suite 200 Everett, WA 98204 (425)741-3800	Site Planning and Engineering, Document Preparation
Lance Mueller and Associates 130 Lakeside, Suite 250 Seattle, WA 98122 (206) 325-2553	Architecture
Landau Associates, Inc. 23107 100th Avenue W. Edmonds, WA 98029 (425) 778-0907	Geotechnical/Hazardous Materials Analysis
McCulley, Frick & Gilman, Inc. 19203 36th Avenue W., Suite 101 Lynnwood, WA 98036 (425) 921-4000	Air and Noise Analyses
Talasea Consultants 15020 Bear Creek Road NE Woodinville, WA 98072 (425) 861-7550	Wetlands and Upland Habitat
Pentec Environmental, Inc. 120 Third Avenue South, Suite 110 Edmonds, WA 98020 (425) 775-4682	Marine Environment
Perteet Engineering, Inc. 2707 Colby Avenue, Suite 900 Everett, WA 98201 (425) 252-7700	Transportation Analysis

REQUIRED PERMITS AND APPROVALS:

Port of Everett
Amendment to *"Port of Everett Comprehensive Scheme of Harbor Improvements"*

City of Everett:
- Shoreline Substantial Development Permit - Department of Planning and Community Development
- Binding Site Plan - Department of Planning and Community Development
- Grading Permit - Department of Public Works
- Building Permits - Building Department
- Utility Extensions - Department of Public Works, Utilities Division

State of Washington
- 401 Water Quality Certification - Department of Ecology
- Hydraulic Project Approval - Department of Fish and Wildlife

Federal
- Corps of Engineers Nationwide Permit 3 - Bulkhead Maintenance and Repair

DATE OF ISSUE OF FSEIS: April 6, 1999

LOCATION OF ADDITIONAL DOCUMENTS:

Technical reports, background data, and other relevant information are available at the following locations:

Port of Everett
P.O. Box 538
Everett, WA 98206

Reid Middleton, Inc.
728 134th Street SW, Suite 200
Everett, WA 98204

COST OF FSEIS: $10.00

DISTRIBUTION LIST

Federal Government

U.S. Army Corps of Engineers
U.S. Environmental Protection Agency (Seattle)
U.S. Fish and Wildlife Service (Olympia)
National Marine Fisheries Service

Tribal Government

Tulalip Tribe

State Agencies

Office of Archeology and Historic Preservation
Department of Community, Trade and Economic Development
Department of Ecology
Department of Fish and Wildlife
Department of Natural Resources
Department of Transportation

Regional Agencies

Community Transit
Puget Sound Air Pollution Control Agency
Puget Sound Regional Council

Snohomish County

Department of Planning and Development Services

City of Everett

Everett Planning Department
Everett Department of Public Works
Everett Parks and Recreation Department
Everett Fire Department
Everett Police Department

Utilities and Services

General Telephone
Puget Sound Energy

Libraries

City of Everett Library, Main Branch and Evergreen Branch

Community Groups

Northeast Everett Community Organization
Northwest Neighborhood Group
Riverside Neighborhood Association
REBOUND
Everett Chamber of Commerce

News Media

Snohomish County Tribune
The Everett Herald

Other

ASARCO (Everett)
Burlington Northern Railroad
Weyerhaeuser Corporation

CHAPTER 1
SUMMARY

1.1 Proposed Action

Comprehensive Scheme of Harbor Improvement

The proposed action is an amendment to the 1995 *Comprehensive Scheme of Harbor Improvements of the Port of Everett* to include a Master Plan for a newly acquired 78 acre site to be known as Riverside Business Park (the "Proposed Project"). *The Comprehensive Scheme of Harbor Improvements*, required by RCW 53.20.010, provides an over-all strategy for Port of Everett development activities. The location of the Proposed Project site is shown in Figure 1.

The Riverside Business Park would be a master planned, phased manufacturing, industrial, and warehouse/distribution business park owned and managed by the Port of Everett.

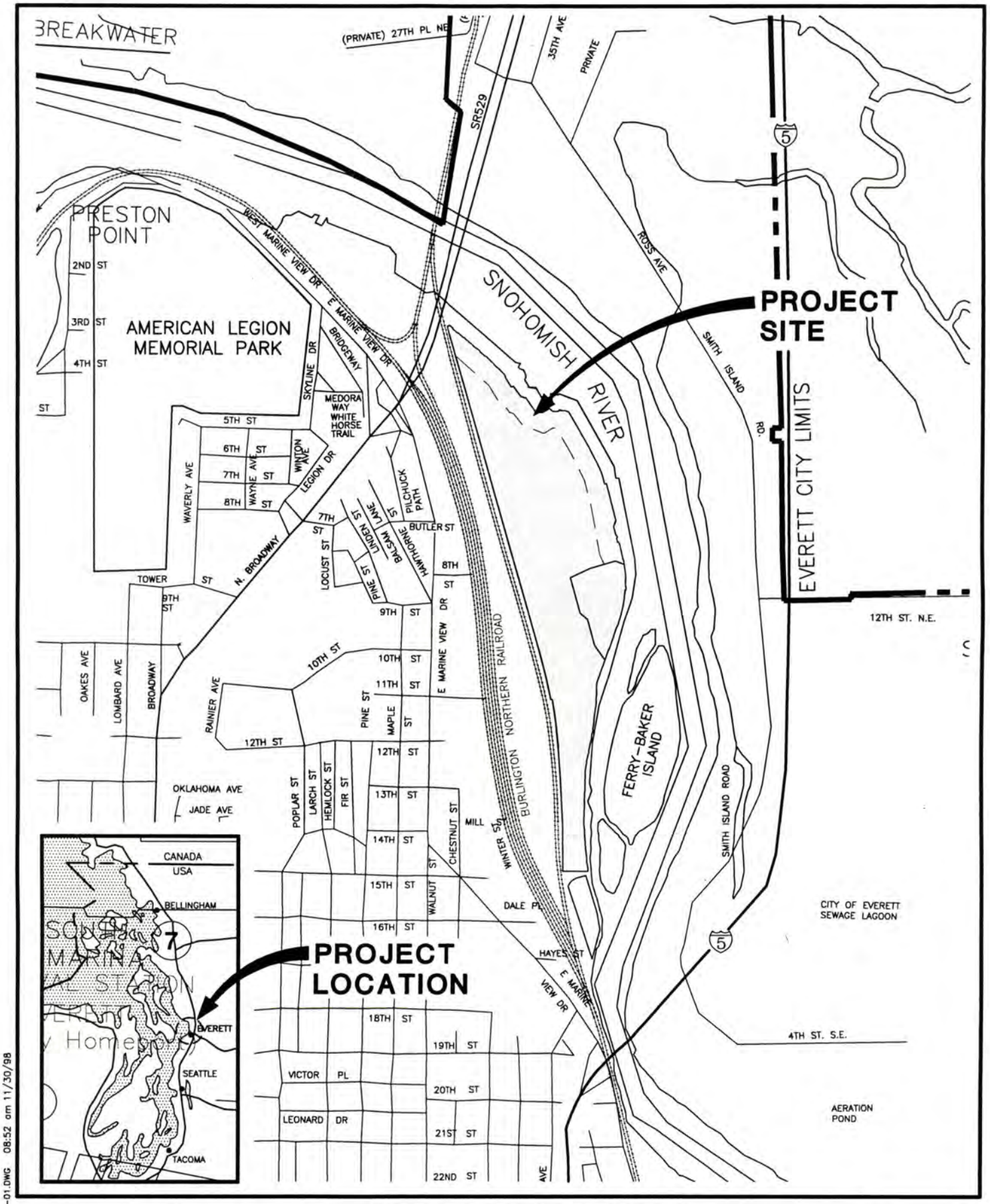
Riverside Business Park Master Plan

The proposed Master Plan provides for redevelopment of the old Weyerhaeuser Everett East lumber processing site into a 78 acre business park with 1,350,000 square feet of industrial, warehousing, and manufacturing space. It is anticipated that 10 percent of the new space would be occupied by general heavy industrial use, 50 percent by warehousing, 30 percent by manufacturing, and the remaining 10 percent by general light industrial use. The northeastern edge of the site, adjacent to the Snohomish River, would be reserved for approximately 287,000 square feet of marine-related/water-dependent uses. Construction of site infrastructure is proposed to begin in the year 2000, with building improvements to follow in years 2000, 2001, and 2002. The Proposed Project is shown in Figure 2.

Purpose of the SEIS

The primary purpose of this non-project/project SEIS is to ensure that environmental impacts and mitigation measures for the Proposed Project and alternatives are disclosed and considered by local government decision-makers. The SEIS process will enable the Port of Everett, the City of Everett, and interested citizens to review and comment on the proposed action. This process is intended to assist the Port in the evaluation of their plans and decisions, and to identify relevant environmental issues, potential environmental impacts, and appropriate mitigation measures prior to issuing a Final Supplemental Environmental Impact Statement (FSEIS) and decision on the

(This page intentionally left blank.)



E:\21\98\018\EISGRAPH\FIG-01.DWG 08:52 am 11/30/98

ReidMiddleton
728 134th Street SW · Suite 200
Everett, Washington 98204
Ph: 425 741-3800

PROJECT LOCATION MAP

Riverside Business Park
Port of Everett Comprehensive Plan Amendment

Port of Everett

Figure 1

Source: RMI

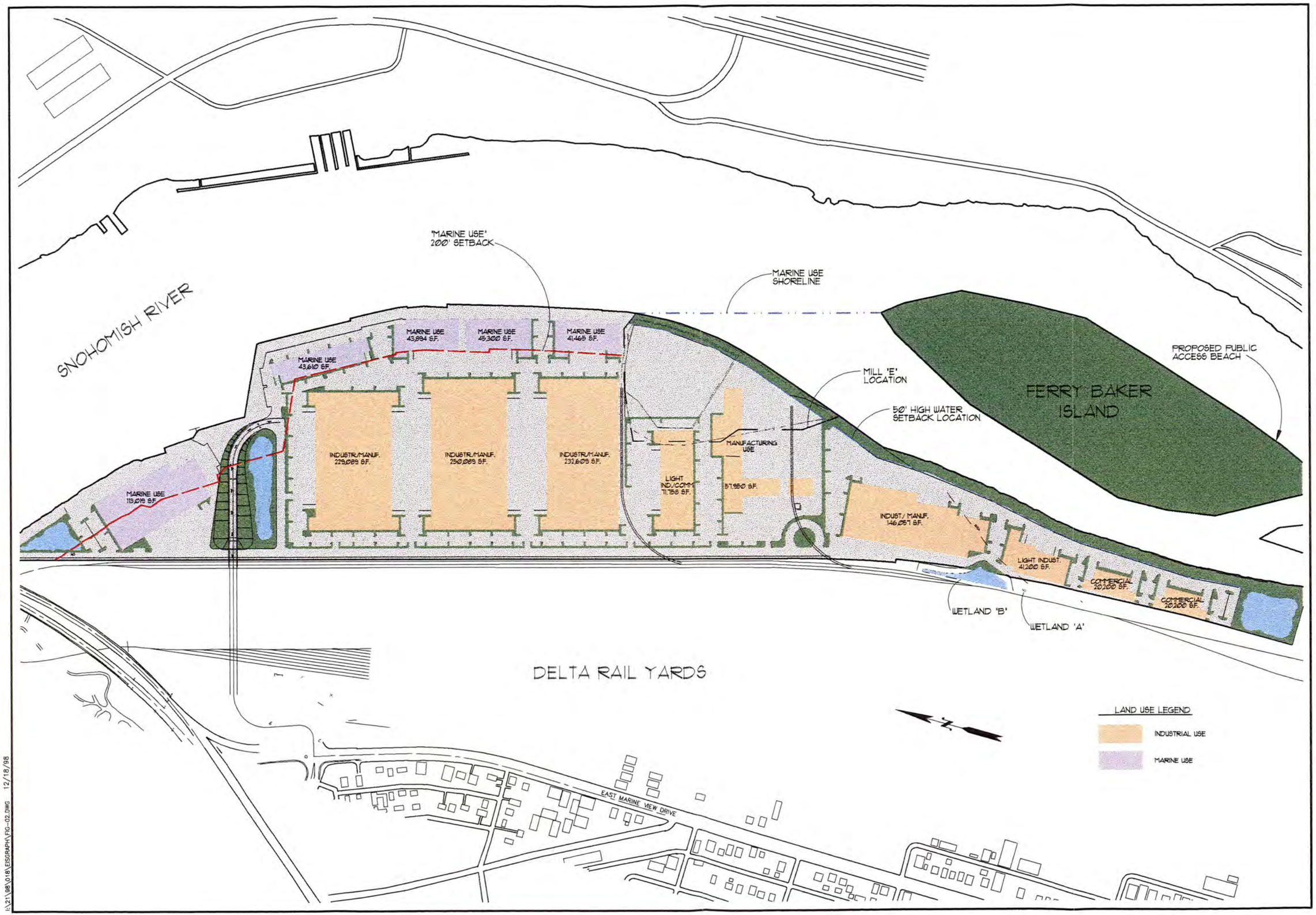


Figure 2

Source: Lance Mueller RML Inc.

Port of EVERETT

PROPOSED PROJECT – SITE PLAN

Riverside Business Park
Port of Everett Comprehensive Plan Amendment

Reid/Middleton
728 134th Street SW - Suite 200
Everett, Washington 98204
Ph. 425 741-3800

I:\21\98\018\EISGRAPH\FIG-02.DWG 12/18/98

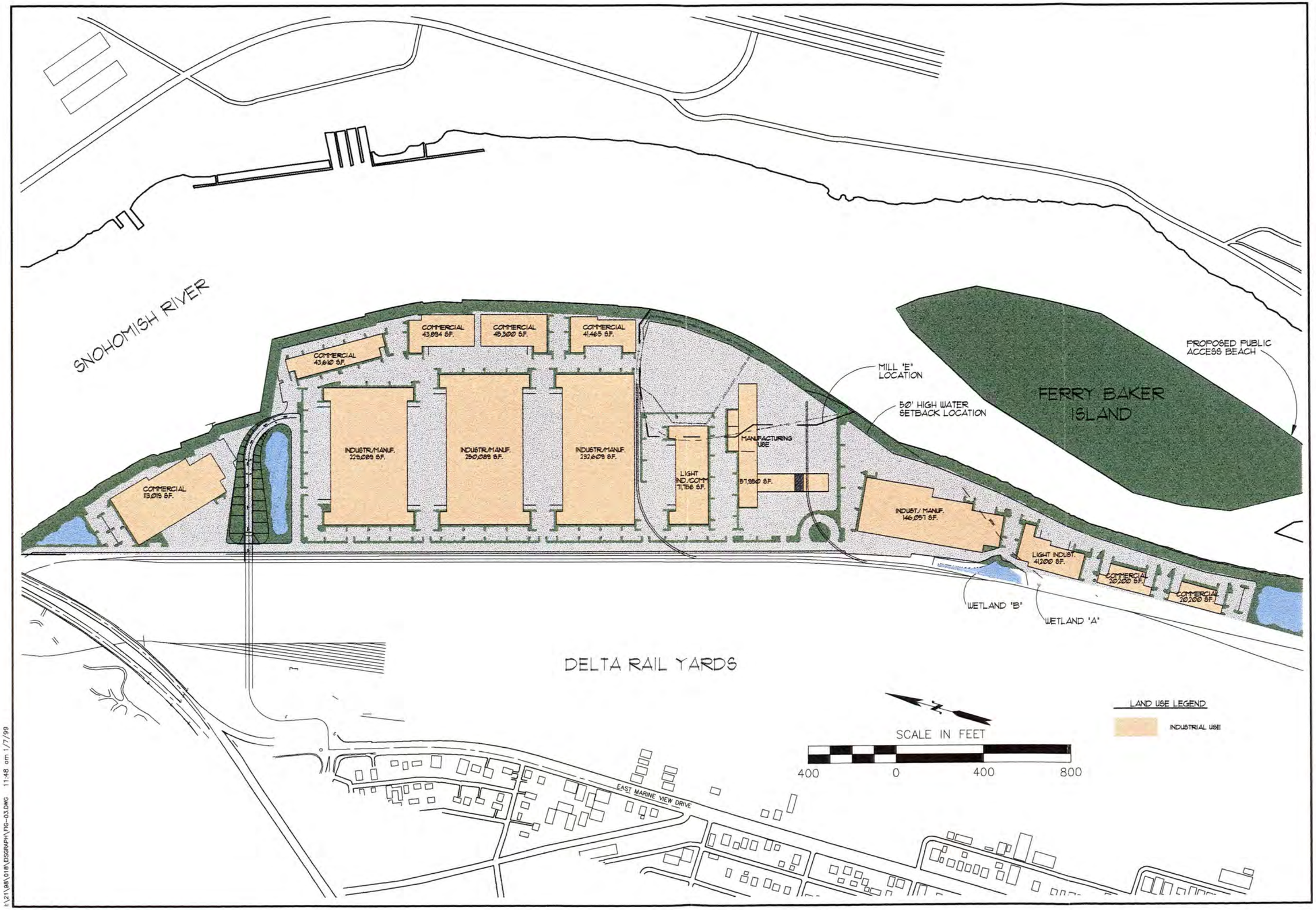


Figure 3

Source: Lance Mueller RMI, Inc.

Port of EVERETT

ALTERNATIVE 1 – SITE PLAN

Riverside Business Park
Port of Everett Comprehensive Plan Amendment

Reid Middleton
728 134th Street SW - Suite 200
Everett, Washington 98204
Ph: 425 741-3800

I:\21\98\018\EISGRAPH\FIG-03.DWG 11:48 am 1/7/99

Proposed Project. The Port will use this SEIS in conjunction with other relevant materials and considerations to plan actions and make decisions (WAC 197-11-400).

1.2 Objectives of the Proposal

The objectives of the Port of Everett for the Riverside Business Park are to:

- Attract industries to the Port District that provide family wage jobs.
- Provide for sustained Port and community economic growth.
- Broaden the Port of Everett's revenue base.
- Develop a project with high development standards which enhances the property's current state.

1.3 Project History

The Port of Everett purchased the Proposed Project site from the Weyerhaeuser Corporation in 1998. From 1902 until 1982, the site was used by Weyerhaeuser for lumber processing and was known as the "Weyerhaeuser Everett East Site." On-site lumber processing facilities included saw mills, wood processing and storage areas, diesel and gasoline fuel storage tanks, and wood sap stain and end seal treatment tanks. Approximately 1,800 people were employed on-site in 1978. The lumber processing ceased in the mid 1980s; subsequently the site was listed as a State cleanup site under the Model Toxics Control Act. Cleanup for the majority of the site is governed by a 1997 Consent Decree between the Department of Ecology and Weyerhaeuser. Cleanup for the Mill E portion of the site is pending negotiation and approval of a separate Consent Decree. Cleanup activities associated with the 1997 Consent Decree are complete. Cleanup levels are based on the assumption that the site would be industrially developed consistent with the current M-2 zoning designation.

Since closure of the lumber processing operations, the Proposed Project site has been used for log rafting/storage, a wood recycling operation, storage of dredge spoils, solid waste transfer operations by the Rabanco Companies, and a small Weyerhaeuser office managing the cleanup activities.

Access to the Proposed Project site has historically been via a trestle crossing above the adjacent Burlington Northern rail yard. The old, wooden trestle is currently being replaced by a new bridge which is scheduled to be completed by December 1998.

The Port of Everett purchased the Proposed Project site in April 1998 to meet the Port's long-term real estate goals: providing opportunities for business and industry expansion, promoting new job growth, and increasing revenue for the community.

1.4 Summary of Alternatives

Alternatives to the Proposed Project were developed based on opportunities and restraints placed on the Proposed Project site by the existing regulatory framework; i.e., limitations on future land uses resulting from the Cleanup Action and 1997 Consent Decree; requirements of the existing M-2 Heavy Manufacturing zoning district; and requirements of the City of Everett Shoreline Master Program.

Alternative 1 - No Water-Dependent Uses

Alternative 1 would be similar to the Proposed Project in the site layout. However, there would be no marine-related or water-dependent users. A conceptual site plan for Alternative 1 is shown in Figure 3.

Alternative 2 - Single, Water-Dependent User and Business Park

Alternative 2 would result in the northeastern portion of the site adjacent to the river being developed by a single, water-dependent industrial user and the remainder of the site developed as a business park. Given the relatively shallow depth of the river at this location and the restrictions on marine shipping traffic imposed by the SR 529 and Burlington Northern drawbridges, this alternative is assumed to apply to only barge related industries. For purposes of examining this alternative, the analysis would address a ready-mix plant and associated concrete products plant on the northeastern 20 acres of the site, and industrial/warehousing/distribution use of the remaining 58 acres. A conceptual site plan for Alternative 2 is shown in Figure 4.

Alternative 3 - No Action

The No Action Alternative would result in no adoption of a Master Plan for the Proposed Project site at this time. The Port would continue to hold the property for future industrial use and current on-site activities such as log rafting, storage of dredge spoils, and solid waste transfer operations would continue indefinitely (Figure 5).

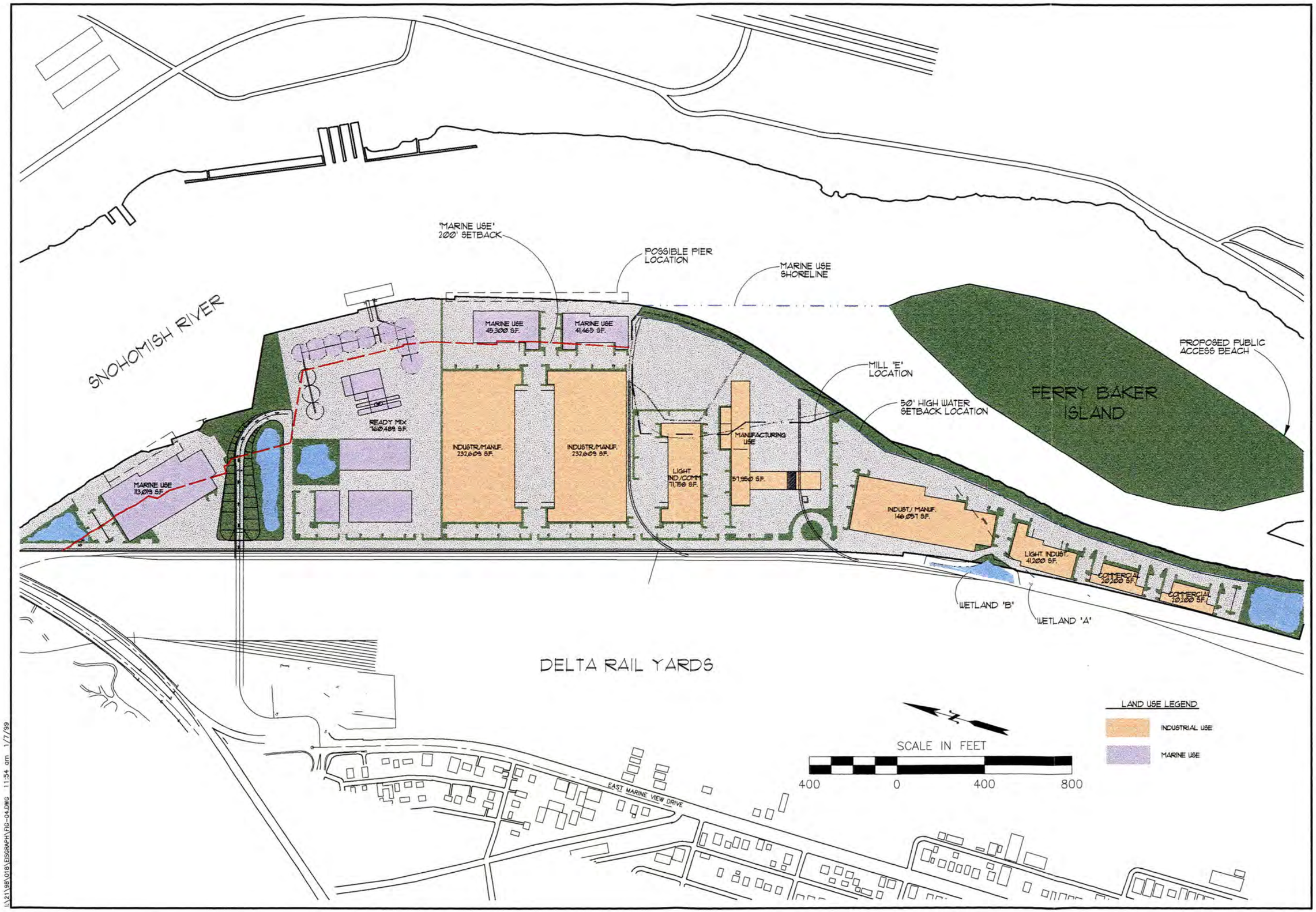


Figure 4

Source: Lance Mueller RMI, Inc.

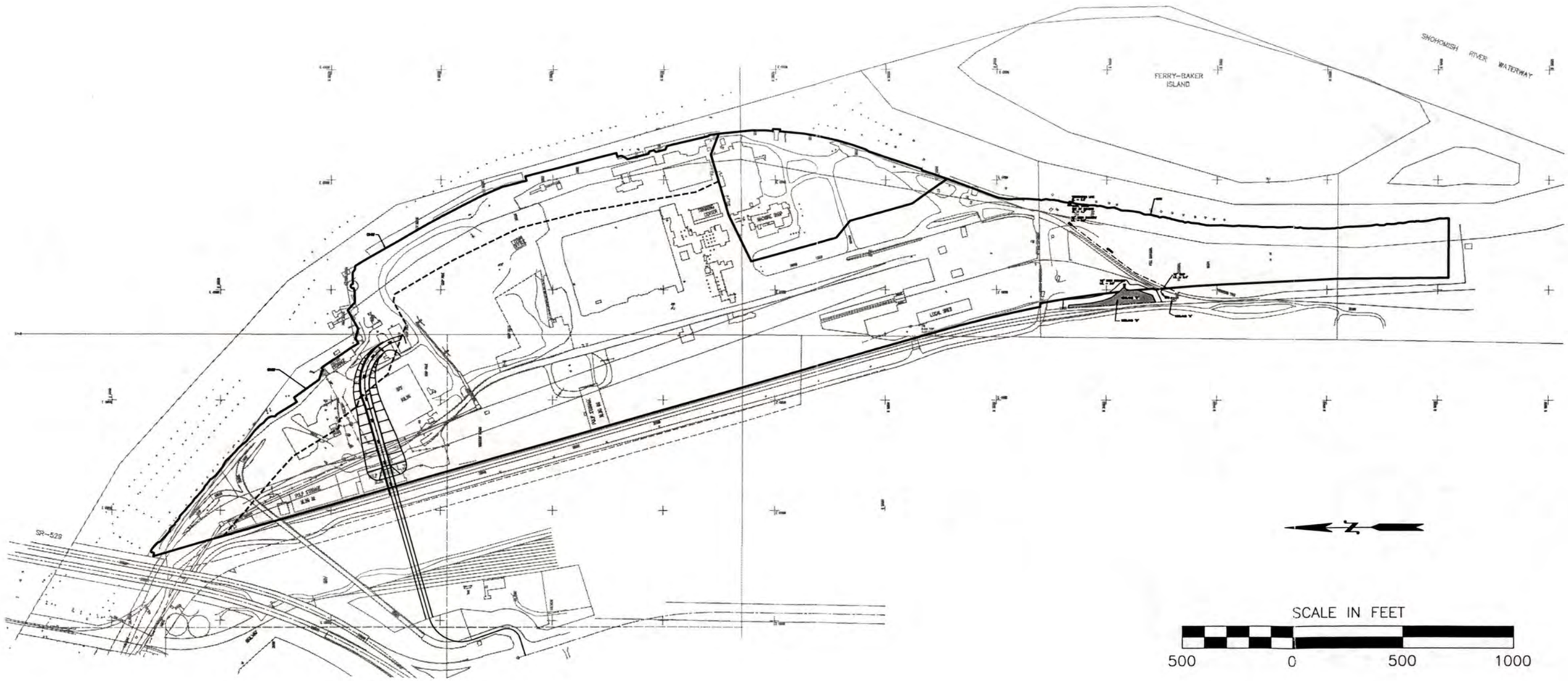
Port of EVERETT

ALTERNATIVE 2 – CONCEPTUAL SITE PLAN

Riverside Business Park
Port of Everett Comprehensive Plan Amendment

ReidMiddleton
728 134th Street SW - Suite 200
Everett, Washington 98204
Ph: 425 741-3800

I:\21\98\018\EPSGRAPH\FIG-04.DWG 11:54 am 1/7/99



RIVERSIDE BUSINESS PARK

SCALE: 1" = 500'

Figure 5

Source: RMI, Inc.

Port of EVERETT

ALTERNATIVE 3 – NO ACTION PLAN

Riverside Business Park

Port of Everett Comprehensive Plan Amendment

ReidMiddleton
728 134th Street SW • Suite 200
Everett, Washington 98204
Ph: 425 741-3800

E:\21\98\018\EISGRAPH\FIG-05.DWG 1:14 pm 12/16/98

1.5 Significant Areas of Controversy/Issues to be Resolved

- Requirement that the Snohomish River shoreline be used for marine related/water-dependent uses.

  The City of Everett Shoreline Master Program gives priority to water-dependent uses within the "Urban Developed and Redeveloping" shoreline environment. The ability of marine traffic to access the Proposed Project site is limited, however, due to both the shallow depth of the river at this location and the presence of the SR 529 and railroad draw bridges. It is uncertain whether or not the Port of Everett would be able to attract such uses to this location.

- Impact of site-generated automobile and truck traffic on surrounding street system and neighboring residential area.

  Residents of neighborhoods along East Marine View Drive have expressed concern regarding existing and future traffic congestion and noise levels resulting from increased traffic on this arterial. The proposed increase in truck traffic is of special concern.

- Limitations on public access to the river's edge.

  The City of Everett Shoreline Master Program encourages provision of public access to and along the Snohomish River shoreline. The City's Public Access Plan also proposes a public trail along the shoreline within this site. General public access to the project site is prohibited, however, by the existing private permit regulating use of the old trestle roadway and new bridge. Access to the site from the north is restricted due to the existing industrial development, and access from the south is restricted due to the presence of large wetlands. Public use of the site is also limited to "industrial use" by the 1997 Consent Decree between Weyerhaeuser and the DOE which determined clean-up levels of the site.

- Impact of Proposed Project on shoreline and potential Endangered Species Act (ESA) listing.

  As noted above, the Everett Shoreline Master Program gives priority to water-dependent uses. Such uses may require construction of new docking and mooring facilities which would require work along the shoreline edge and below ordinary high water. As the exact nature of these uses and their shoreline facilities are unknown at this time, the impact of this activity on marine resources, especially salmonid species, is also unknown. Any such proposals would require a separate permitting and environmental review at such time as an application is made.

(This page intentionally left blank.)

Table 1 - SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATING MEASURES

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Earth				
Environmental Impacts				
• Soils/Geology	Earthwork required to construct buildings, roads and utilities. Approximately 400,000 to 600,000 cubic yards of fill (dredged sediment) required to bring site above floodplain. Ground improvement techniques required for building foundation support. Potential for short-term erosion during construction.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing soils/geology.
• Soil Quality	Development will provide overall improvement to site soil conditions. Project consistent with Cleanup Consent Decree and associated Restrictive Covenant. Deep excavations may encounter contaminated soil.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing soil quality. Inconsistent with initiatives to return underutilized, contaminated sites to productive use.
Mitigating Measures				
• Soils/Geology	Temporary erosion control measures to be implemented during construction.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Soil Quality	Health and safety measures to be implemented to protect workers from any contaminated soils. Erosion control measures may also be used to prevent any contaminated soils from leaving the site.	Similar to the Proposed Project.	Similar to the Proposed Project.	

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Air Quality				
Environmental Impacts	Short-term increase in suspended particulates and/or odors during construction. Demolition must be consistent with EPA and PSAPCA regulations concerning removal/disposal of any asbestos materials. No long-term impacts to air quality.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing air quality.
Mitigating Measures	During construction, use well maintained equipment and avoid prolonged periods of idling equipment. Also, minimize construction truck traffic during peak travel times. Special attention to be paid to reducing dust during construction.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Water				
Environmental Impacts				
• Surface Water	Impervious surfaces to be placed over 98% of the site, precluding infiltration of stormwater through residual contaminated soil. Stormwater runoff collection system will meet City of Everett and DOE design standards. Drainage and sediment control facilities to be provided during construction.	Similar to the Proposed Project.	Similar to the Proposed Project, except that two separate storm drainage systems would be constructed. The storm drainage system for the ready-mix plant and associated concrete products plant would be more complex.	No new impervious surfaces; continuation of existing uncontrolled surface water runoff conditions.
• Groundwater	New impervious surfaces would decrease infiltration of any remaining contaminants into groundwater and groundwater discharge to the Snohomish River.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing groundwater conditions.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Mitigating Measures				
• Surface Water	Surface water collection system to be routed through water quality ponds. Detailed drainage plans to be consistent with City and State standards.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Groundwater	Any excavations penetrating into the lower sand aquifer would need to be designed/constructed to limit the potential for contamination.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Plants and Animals				
Environmental Impacts				
• Plants and Animals	Existing valuable plant communities to be retained. No significant loss of habitat; minor impacts to wildlife. Wetland buffers to be enhanced to increase the value to wildlife.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing plant communities.
• Wetlands	Two existing on-site wetlands to be retained. Associated buffers to be reduced and enhanced, consistent with City regulations. Buffer for adjacent off-site wetland to be maintained/enhanced.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to the existing wetlands or associated buffers.
• Marine Environment	No work proposed at this time below ordinary high water (OHW), so no adverse effects on habitat.	Similar to the proposed project.	Any work below OHW associated with the water-dependent use would require separate environmental review and permitting process.	No change to existing conditions.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Mitigating Measures				
• Plants and Animals	No mitigation is required.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Wetlands	No mitigation is required.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Marine Environment	No mitigation is required.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Noise				
Environmental Impacts	Temporary increase in sound levels during construction; impacts expected to be moderate. Long-term increase of 1 dBA (or less) from project-related traffic. Traffic noise levels (with or without Proposed Project) on East Marine View Drive will continue to exceed criterion levels for residential properties.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing noise levels. Traffic noise on East Marine View Drive will continue to exceed WSDOT criterion for residential properties.
Mitigating Measures	Construction noise could be reduced by properly maintaining equipment and limiting construction activities that generate significant noise to daytime hours.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Land Use and Zoning				
Environmental Impacts	78 acres of industrial land to be redeveloped to accommodate 1,350,000 sq. ft. of industrial, manufacturing, and warehouse space. Approximately 287,000 sq. ft. of buildings to be reserved for marine related/water dependent uses. Approximately 450 people to be employed on-site at build-out (year 2002). Project is consistent with adjacent land uses and existing zoning.	Similar to the Proposed Project, except that no space would be reserved for marine related/water dependent uses.	Similar to the Proposed Project, except that the northern 20 acres of the site would be developed for a single water-dependent use such as a ready-mix plant and associated concrete products plant utilizing barge transport.	No redevelopment of the 78 acre site.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Mitigating Measures	Project is consistent with character and nature of surrounding areas and existing zoning. Existing environmentally sensitive areas would be preserved and enhanced.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Consistency with Plans and Policies				
Environmental Impacts				
• City of Everett Comprehensive Plan	Project consistent with "Heavy Industrial" designation of 1994 Everett Comprehensive Plan.	Similar to the Proposed Project.	Similar to the Proposed Project.	No redevelopment of the site would occur.
• Shoreline Master Program	Project consistent with requirements of Everett Shoreline Master Program for areas designated "Ports and Water-Related Industry" and "Commercial Development." ~~Pedestrian trail to be included along shoreline in southern portion of the site. Financial contribution to be made to City trail improvements along East Marine View Drive.~~ Public access to be provided through: establishment of beach/landing area on Ferry Baker island for canoes and kayaks; reservation for public riverfront trail along the southern portion of the site; and contribution toward acquisition of off-site viewpoint.	Elimination of requirement for water-dependent use(s) in northern portion of the site would require amendment to the Everett Shoreline Master Program. ~~Pedestrian trail to be provided along the shoreline~~ Public access to be provided similar to proposed project, except that the trail reservation would extend along the entire site.	Similar to the Proposed Project.	No redevelopment of the site would occur.
Mitigating Measures				
• City of Everett Comprehensive Plan	No mitigation is required.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Shoreline Master Program	Master Program permitting process would require consistency with State and local Master Program requirements.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Light and Glare/Aesthetics				
Environmental Impacts	Project would convert site to 78 acre business/industrial park. Multiple buildings, not exceeding 30 feet in height, would be located within the project. Building and parking lot lighting will introduce sources of light and glare to site during evening hours. Project-related traffic will incrementally increase light and glare along East Marine View Drive during evening hours.	Similar to the Proposed Project.	Similar to the Proposed Project, except that a ready-mix plant and associated concrete products plant would be located in the northern portion of the site, adjacent to the river.	No change to existing appearance of site, and no new sources of light and glare would be introduced to the site.
Mitigating Measures	A landscaping plan would be included in the proposed Master Plan. Street lighting would be designed to shield and focus light within the project site. Potential on-site sources of light and glare would be integrated with native vegetation.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Transportation				
Environmental Impacts	Proposed project to generate approximately 5,492 average daily trips. Approximately 13% of trips to be heavy vehicles (semi-tractor/trailer trucks). All study area intersection except SR 529 Northbound Off Ramp/East Marine View Drive would operate at LOS D or better during PM peak hour. SR 529 Northbound Off-Ramp/East Marine View Drive intersection would deteriorate to LOS F. Minor increases in overall intersection delay at all study area intersections. Pedestrian and bicycle activity in area would increase.	Similar to the Proposed Project.	Project would generate approximately 4,022 average daily trips. Increase in overall intersection delay somewhat less than the Proposed Project.	No new traffic generated by project site. Minor increases in overall intersection delay at most study area intersections.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Mitigating Measures	Mitigation contribution to be based on proportionate share method. SR 529 Northbound Off-Ramp/East Marine View Drive intersection to be signalized. Transit options to be explored with Community Transit. Financial contributions to future pedestrian/bicycle improvements along East Marine View Drive.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
Public Services and Utilities				
Environmental Impacts				
• Fire/Emergency Services	Incremental increase in demand for services.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing demand for fire/emergency medical services.
• Police Protection	Incremental increase in demand for services.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to the existing demand for police services.
• Water	New water distribution system to be constructed. Peak water demand estimated at 0.6-0.8 mgd. Required fire flows may impact one residential area.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to the existing demand for water.
• Sanitary Sewer	Project would generate approximately 0.3 to 0.5 million gallons of sewage per day. Two new on-site lift stations to be provided.	Similar to the Proposed Project.	Similar to the Proposed Project except that fewer gallons of sewage would be generated.	No change to the existing demand for sanitary sewer service.
• Other Utilities	New electrical service, natural gas, and telecommunications to be extended to site.	Similar to the Proposed Project.	Similar to the Proposed Project.	No change to existing services.

Element	Proposed Project	Alternative 1 - No Water-Dependent Uses	Alternative 2 - Single, Water-Dependent User and Business Park	Alternative 3 - No Action
Mitigating Measures				
• Fire/Emergency Services	Adequate fire flow will be provided. Appropriate procedures for handling and storage of flammable and/or toxic materials will be required.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Police Protection	Security measures to be incorporated into project. Use of Port of Everett Security staff will reduce need for City police patrols.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Water	Water conservation measures to be utilized. A private fire system may be required ~~Installation of booster pump station serving the residential area southeast of Legion Park~~ if project design fire flow exceeds 2,250 ~~3,000~~ gpm.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Sanitary Sewer	Installation of odor control facilities, if necessary. Installation of low flow toilets may be considered.	Similar to the Proposed Project.	Similar to the Proposed Project.	No mitigation required.
• Other Utilities	No mitigation required.	No mitigation required.	No mitigation required.	No mitigation required.

CHAPTER 2
PROPOSED PROJECT AND ALTERNATIVES

2.1 Description of Proposal

2.1.1 Name of Proposal

"Amendment to the 1995 *Scheme of Harbor Improvements for the Port of Everett* for Riverside Business Park."

2.1.2 Proposed Project Sponsors

Port of Everett
P.O. Box 538
Everett, WA 98206

Trammell Crow - Development Manager
1687 114th Avenue SE, Suite 250
Bellevue, WA 98004

2.1.3 Proposed Project Location

The proposed 78 acre Riverside Business Park is located in North Everett along the southwest bank of the Snohomish River. The property is bordered on the west by the Burlington Northern Santa Fe Delta rail yard and to the north by SR 529. To the south, the Proposed Project site tapers to a point just northwest of the I-5 bridge across the Snohomish River.

2.1.4 Principal Features of the Proposed Project

The proposed Master Plan for the 78 acre Riverside Business Park provides for a master planned, phased manufacturing, industrial, and warehouse/distribution business park owned and managed by the Port of Everett. It is anticipated that this business park would accommodate 1,350,000 square feet of industrial, manufacturing, and warehousing space. In the northern half of the site, approximately 287,000 square feet of buildings along the river would be reserved for marine related/water dependent uses, including a barge loading facility. At build-out, approximately 450 people would be employed on-site. The first floor of all structures will be elevated 2 to 3 feet above the 100-year flood elevation.

Site improvements are expected to begin in the year 2000. Building improvements would follow in years 2000, 2001, and 2002 under one or more development scenarios: Port build-to-suits, owner-development on leased land, and/or speculative Port/private development. The industrial buildings are anticipated to be high-bay, concrete tilt-up, and/or metal skinned buildings. Building heights would not exceed 30 feet. Buildings would be both single and multi-tenanted. Rail service is available to the site.

Proposed site work associated with construction of the industrial park includes removal of the remaining Weyerhaeuser structures and foundations and raising the elevation of the site 2 to 3 feet to bring the site above the elevation of the 100-year floodplain. Approximately 400, 000 to 600,000 cubic yards of fill would be required. The fill to be used would be dredge spoils taken directly from an approved dredge site in the Snohomish River.

The natural character of the 78 acre site has been significantly disturbed by the past lumber processing activities. One small wetland is found in the southwestern portion of the site, and a tidal area wetland is located adjacent to the river in the southern portion of the site. The proposed Master Plan includes retention of both wetlands. Buffer widths established by City code would be reduced with the addition of buffer enchancements, consistent with City requirements. In the southern half of the site, a 50-foot vegetative buffer would be maintained and enhanced along the river's edge.

An existing wooden bulkhead and wharf will be retained in the northern portion of the site. The Proposed Project anticipates only minor repair of this structure. Any new docking or moorage facilities required for the water-dependent uses would require a separate permitting and environmental review process. Remnants of an old bulkhead can also be found in the southern portion of the site.

Access to Riverside Business Park would be via a bridge over the Burlington Northern rail yard onto East Marine View Drive, with a second, "emergency-only" access at the north end of the site via the adjacent property. The old wooden trestle over the rail yard is currently being rebuilt and repositioned; the new bridge would intersect East Marine View in the same location as the original trestle. Past agreements with Burlington Northern Railroad limit use of the new bridge to Port business, tenant operations, utilities, and maintenance. Due to this pre-existing legal agreement regarding use of the bridge, public access to the river shoreline is limited accordingly.

New roads within the Proposed Project site would be built to City of Everett standards but maintained by the Port. The Proposed Project is anticipated to generate 5,500 trips per day, approximately 13 percent of which would be trucks.

Site utilities would include new water, sanitary sewer (City of Everett), and storm drainage systems. The storm drainage system includes three water quality ponds with discharge into the Snohomish River.

Public services such as police and fire/emergency medical services would be provided by the City of Everett.

2.1.5 Benefits/Advantages of Delaying Implementation

Delaying adoption of a Master Plan for the Proposed Project site would result in a continuation of the current low-intensity industrial use. The benefits of delaying implementation primarily relate

to delaying traffic-related impacts to residential neighborhoods along East Marine View Drive. The site would not be redeveloped. Inasmuch as the site is designated for industrial redevelopment, pressure to make economic use of the site would continue. As East Marine View Drive is a designated principal arterial and designated truck route, traffic volumes would continue to increase (but to a lesser degree) with or without this Proposed Project.

2.2 Alternatives

Alternatives to the Proposed Project have been developed to provide a basis for subsequent decision-making regarding the proposed Master Plan. For all alternatives, it is assumed that requirements of the 1997 Cleanup Consent Decree and the existing M-2 Heavy Manufacturing zoning would remain unchanged.

2.2.1 Alternative 1 - No Water-Dependent Uses

Alternative 1 would be similar to the Proposed Project except that there would be no marine related or water-dependent users. An amendment to the City's Shoreline Master Program would be required to allow all non-water dependent uses within 200 feet of the shoreline. The approximate 287,000 square feet of marine related uses identified in the Proposed Project would be available for any industrial user. A barge loading facility would not be required. The total square footage of the industrial park, site improvements, utilities, traffic and access, etc. would be similar to the Proposed Project.

2.2.2. Alternative 2 - Single, Water-Dependent User and Business Park

Alternative 2 would result in a single, industrial water-dependent use occupying approximately 20 acres in the northeastern portion of the site, adjacent to the Snohomish River, and the remaining 58 acres occupied by approximately 865,385 square feet of manufacturing, industrial, and warehousing/distribution uses, similar to the Proposed Project.

Although the Proposed Project site is adjacent to the Snohomish River, the availability of marine transport is limited due to the relatively shallow depth of the river at this point and restrictions on shipping access imposed by the SR 529 drawbridge and Burlington Northern's rail drawbridge. This alternative thus assumes only a barge-related water use would apply to the site. For purposes of examining this alternative, the industrial user is a ready-mix concrete plant and associated concrete products plant.

Operation of a ready-mix plant and associated concrete products plant would require construction and maintenance of facilities for delivery of gravel and sand; storage of gravel, sand and cement; an enclosed production facility; truck loading facilities; truck-wash bays; and facilities for storage and distribution of the end product. The ready-mix plant and concrete products plant would be located along the shoreline on the northern half of the site where there is adequate water access.

General site improvements in this area would include partial paving, potential fill to raise portions of the site above the floodplain, a large building for the concrete products plant, as well as improvements to the adjacent shoreline adjacent to off-loading or mooring facilities. The ready-mix/concrete products plant would generate approximately fifty on-site family wage jobs.

Delivery of sand and gravel to the site would require construction of moorage for ocean going barges. Moorage would likely be in the form of offshore support dolphins. Rehabilitation of the existing bulkhead and construction of a new pier could be an alternative to moorage. Because there many uncertainties about this issue, a more detailed level of environmental analysis would be required prior to any over-water or in-water construction.

It is anticipated that sand and gravel would be off-loaded from barges to outdoor storage piles via a transfer span and conveyor. Regular dredging would be required to accommodate the draft of ocean-going barges.

Storage of the sand and gravel would likely be in 40-foot piles separated by 12-foot concrete dividing walls. Depending on the type of aggregate used, some covered storage facilities may also be required. One or two 40-foot high hoppers would be used to hold the cement. The associated concrete products plant would be located inside a building to provide a controlled environment for the production process. The building would also be hydrologically isolated, so that all water used in the production process can be recycled. The majority of the site would be used for outdoor storage and settling basins required for water quality treatment.

The ready-mix product is distributed primarily by truck. The concrete products would be distributed by truck or rail. Approximately 270 trucks are anticipated to enter and exit the site on a typical business day, although daily truck traffic would vary according to production levels. The majority of the traffic would be for wholesale purchasing. Very little retail sales would occur on-site.

With this alternative, the remainder of the site (58 acres) would be developed as a non-water dependent business/industrial park similar to the Proposed Project. In total, this alternative would generate approximately 4,000 vehicular trips per day, approximately 13 percent of which would be trucks. Approximately 385 family wage jobs would be provided.

Access to the site would be via the single bridge, similar to the Proposed Project. Site utility improvements also would be similar to the Proposed Project.

Retention of wetlands and establishment of a 50-foot shoreline buffer along the southern portion of the site would be the same as the Proposed Project.

2.2.3 Alternative 3 - No Action

The No Action Alternative would result in no adoption of a Master Plan for the Proposed Project site at this time. The Port would continue to hold the property for future industrial use and

current on-site activities such as the storage of dredge spoils and solid waste transfer operations would continue indefinitely. Access to the site would continue to be via the new bridge. Although the site would be used for storage of dredge spoils, the site would not be filled to bring it above the floodplain. Also, no new water, sewer, or storm drainage systems would be constructed. The two on-site wetlands, the wetland buffers, and the shoreline edge would remain in their present state.

(This page intentionally left blank.)

CHAPTER 3 - ERRATA SHEET AFFECTED ENVIRONMENT, ENVIRONMENTAL IMPACTS, MITIGATING MEASURES, AND UNAVOIDABLE ADVERSE IMPACTS

Page III-42
Paragraphs 5 and 6 have been changed to read:

3.4.3.1 Existing Conditions

Snohomish River Habitat

~~In some areas, erosion has occurred behind the vertical pilings of the trestle. In these areas, logs have been placed behind trestle piles to minimize further erosion. Localized seeps discharge into the river along the length of the site from small openings in the bulkhead. Stormwater is also discharged at several discharge points in along the entire site.~~

~~In areas behind the failing portions of bulkhead and in other areas of sediment accumulation, natural riparian grasses and herbs have become established for a few vertical feet below the ordinary high water line. Areas below the bulkhead and below vegetated areas of shoreline are muddy sand typical of lower shorelines and of the riverbed throughout the lower Snohomish Estuary.~~

In some areas along the middle section of the site, erosion has occurred behind the vertical pilings of the trestle or bulkhead. In those areas, logs have been placed behind the trestle piles to minimize further erosion. Stormwater is discharged at several points or in sheet flow along the shoreline.

In areas behind the failing portions of bulkhead and in other areas of sediment accumulation, natural riparian grasses and herbs have become established for a few vertical feet below the ordinary high water line. Areas below bulkhead and below vegetated areas of shoreline are muddy sand typical of lower shorelines and the river bed throughout the lower Snohomish Estuary.

North of the Mill E portion of the site the shoreline consists of a largely intact vertical bulkhead forming a marginal wharf; this area is closest to the navigation channel and appears to offer the best opportunities for water-dependent access. North of this area, the shoreline cuts sharply to the west. Offshore, the widened river has formed a broad mudflat that fronts the remainder of the northern portion of the site. This area was historically used for log-raft storage and many pilings and boomsticks remain.

Along the northern (downstream) portion of the site (north of the site access road), the bulkhead is below the high water level in places and some aquatic vegetation has become

established behind the bulkhead line. The Department of Ecology has identified this as an area with a high potential for shoreline and riparian restoration.

Page III-54
Paragraph 3 has been changed to read:

3.4.3.2 Environmental Impacts

Proposed Project

~~The Proposed Project will include one or more water-dependent users adjacent to the shoreline in the northern portion of the site. Development of water access will likely result in significantly more impact to habitat and water quality.~~
In the event a water-dependent user is identified, there would be significant impact to habitat and water quality, primarily along the northern portion of the site. It is assumed that waterfront use would be primarily barge traffic due to the shallow draft of the river in the area. Other possibilities might be small fishing vessels, typically owned and operated by private individuals, or tour boats. Larger deep draft ocean going vessels are not a possibility at the site due to the shallow bottom depth of the main river channel. Most likely, these barges would need "roll-on/roll-off" capability to allow efficient loading and unloading of a variety of different types of material. Other options could include using mobile cranes to place or remove individual items on the barge.

Paragraph 4 has been changed to read:

~~A water-dependent user would potentially require improvements to the bulkhead area on the northern portion of the site. Moreover, dredging would be required at the face of the bulkhead where the existing water depths are too shallow even for barge moorage at low tide. Given the speculative nature of such improvements, no analysis has been conducted of these activities. In the event a water-dependent user is identified, a full environmental review and new Shoreline Substantial Development Permit would be required at the time of pursuing any improvements affecting the marine environment. Such a structure would have both negative and positive effects on near-shore habitat for juvenile salmonids, providing cover and refuge from avian predators but shading the shoreline and reducing local primary productivity. Mitigation opportunities exist on the site in the form of removal of existing derelict over-water structures, of existing bulkheads, and of any existing creosoted pilings. A plan specifying appropriate mitigation to offset unavoidable adverse effects of wharf or pier construction would be prepared in conjunction with permit applications for that action.~~
It is assumed that the existing wharf structure is in adequate condition for the uses described above. Visually, the existing wharf appears in adequate condition. No structural analysis has been completed to assess the existing strength of the facility.

It is assumed that dredging would be required to provide adequate access for the barges. Assumed adequate dredging is 15 feet below mean low water. This would provide

adequate clearance for the barges to prevent them from resting on the bottom during low tides. It would not necessarily provide clearance for "anytime" access for tugs that would move the barges.

No hydrographic surveying has been conducted in the area of the proposed wharf facility due to the speculative nature of such a use. In order to provide a basis of comparing project alternatives, the following analysis has been provided to demonstrate a general range of impacts that might be incurred in the event a water-dependent user is identified. The following dredging analysis contains numerous assumptions. These assumptions are as follow:

- It is assumed the existing bottom slopes at a 20:1 ratio away from the existing wharf face.
- It is assumed the surface of the wharf is 16 feet higher than mean lower low water (tidal datum). This is based on the aerial mapping conducted by Clark M. Leeman Company in 1990-1991.
- It is assumed the existing bottom at the face of the wharf is 4 feet below mean lower low water. This is based on lead-line reading taken at the face of the pier in 1998.
- It is assumed that the existing bottom material could be dredged to a 4:1 slope without any structural reinforcement. No geotechnical data have been gathered to support this assumption.

To obtain the needed mooring depth at the face of the wharf, about 11 feet of dredging would be required. It is unlikely that the wharf is structurally designed to accommodate this loss of material at its face. Consequently, either the wharf would be replaced with a different structure to accommodate this depth, or alternatively, the mooring of barges would be offset from the face of the wharf with mooring dolphins. For this analysis, the offset option has been selected since it would be more cost effective than replacing the wharf.

Using the 20:1 assumed bottom slope, the necessary depth would be 220 feet from the face of the wharf. This distance is impractical for a direct ramp connection to the wharf, and would require the construction of a pier structure to access the mooring area and would infringe on the established traveling channel. A reasonable ramp distance would be 50 to 100 feet, which would be a feasible facility, and allow enough height variation to accommodate tides and draft differences in barges. Construction of a ramp of this length would require dredging the existing bottom at about a 4:1 slope for the entire "basin" from the face of the wharf to provide proper depth at the mooring location. The width of the dredge area would need to accommodate one barge being maneuvered into position by a tow tug. Using a 5:1 maneuverability factor, a 200-foot barge would require approximately 1,000 feet of accessible area.

For calculation purposes, a dredge slope of 4:1 would be established from the face of the wharf until the dredge depth of -15. From there the area would be dredged flat for approximately 220 feet from the face of the wharf. In order to create such a "basin" approximately 42,000 cubic yards of material would need to be excavated.

Construction of the ramp would require two pile towers be constructed on either side of the ramp at the barge mooring area. These would support the ramp, and house the winch and pulley systems that would raise and lower the ramp. The towers would consist of three to five piles each with interconnecting structure to provide the proper support.

Mooring dolphins would be constructed 50 to 100 feet away from the shore for the barges to tie to when in use at the facility. These dolphins would consist of pile groups of two to ten piles each. They might include electric winch controls to hold the barge in the proper position during loading operations. Existing wood piles about 100 feet from the shoreline would be removed to provide adequate room for the barge operation.

If the site were used for transport of raw materials, a conveyor system might be added for more efficient movement of the materials. The ramp access and dredging would still be necessary, and three to ten piles would be added to support the conveyor system.

Before dredging occurred, the nature of sediments to be dredged would be characterized in accordance with Puget Sound Dredged Disposal Analysis (PSDDA) procedures (for open-water disposal) or Snohomish County procedures (for upland disposal). Because of the history of the site, the nature of underlying sediments that would be exposed by the dredging would also be of concern. Dredging would likely be by clam shell for open-water disposal and could be by clam shell or hydraulic dredge if nearby upland disposal was used.

It is clear that substantially less dredging would be required to provide water access to the central portion of the site in the vicinity of the existing marginal wharf than at the extreme north end of the site (north of the access road). The latter area lies much farther from the navigation channel and is fronted by a broad shallow mudflat. Moreover, this mudflat likely is more stable and biologically productive than is the deeper area in front of the marginal wharf. Although specific dredging areas and volumes are unknown, the generic nature of the potential impacts of dredging follows.

Dredging would be timed to avoid periods when juvenile anadromous salmonids are present at the site. Dredging would suspend small amounts of sediment that would be carried up or downstream by the prevailing currents. Levels of sediment suspended in the water column would be limited and would be unlikely to be detectable beyond about 300 feet of the work area. However, some increase in the natural rate of sediment deposition could result in areas up and downstream of the site. Because the sediments would be similar in character to the existing bottom sediments in those areas of deposition, and because those sediments are in a continual state of movement by river and tidal currents, the additional deposition would not have significant effects on river benthos which is

adapted to those conditions. In the event that hydraulic dredging were used, the decant water would be controlled to meet applicable water quality specifications before returning to the river.

Dredging would eliminate all existing benthos in the area to be dredged. Recolonization of these areas would be rapid however (e.g., a period of weeks or months), because the fauna is adapted to the shifting river sands, and because reversing currents would provide a ready source of organisms for recolonization. Because the shallow mudflat area off shore of the northern end of the site is likely more uniformly depositional, it may have a fauna that is less well adapted to rapid recolonization than that in the area adjacent to the central portion of the site. Moreover, since the area to be dredged would be substantially larger at the northern end of the site (because of the greater distance from the channel), impacts of providing water access to this area would be greater than impacts to provide access to the central area.

Deepening of the shoreline adjacent to a berth to provide water access would create a break in the existing relatively shallow-water shoreline migration corridor for juvenile salmon. This break would be most significant if water access were provided at the extreme northern end of the site where the present shoreline has a very shallow sloping mudflat. Although deeper water along the shoreline can provide refuge for salmon from certain types of predators (e.g., kingfishers), it may increase their vulnerability to others (e.g., larger salmonids).

Page III-55
This section has been changed to read:

Alternative 1 - No Water-Dependent Uses

~~The impacts of Alternative 1 to the marine environment would be similar to the Proposed Project unless a water-dependent user is identified. In that event, Alternative 1 would have significantly less of an impact on the marine environment than the Proposed Project. There would be no bulkhead construction, no dredging, and no prop scour associated with barges being maneuvered to and from the site.~~
The impacts of Alternative 1 to the marine environment would be similar to those of the Proposed Project, unless the Proposed Project includes a water-dependent use that would require shoreline construction and/or dredging. In that event, Alternative 1 would have significantly less of an impact on the marine environment than would the Proposed Project. There would be no bulkhead construction, no dredging, and no prop scour associated with barges being maneuvered to and from the site. Also, under Alternative 1, the 50-foot riparian buffer would be extended along the entire site shoreline with concomitant benefits for shoreline ecological functions.

Page III-55
This section has been changed to read:

Alternative 2 - Single, Water-Dependent User and Business Park

Under Alternative 2, a future water-dependent user may require construction of an over-water berth or pier that would be the subject of a separate environmental review and permitting process. Such a structure would have both negative and positive effects on near-shore habitat for juvenile salmonids, providing cover and refuge from avian predators but shading the shoreline and reducing local primary productivity. The nature of a potential wharf structure and the potential impacts would be the same as identified in the Proposed Project above. Mitigation opportunities exist on the site in the form of removal of existing derelict over-water structures, of existing bulkheads, and of any existing creosoted pilings. A plan specifying appropriate mitigation to offset unavoidable adverse effects of wharf or pier construction would be prepared in conjunction with permit applications for that action.

Page III-70
Paragraph 1 has been changed to read:.

3.6.1 Affected Environment

As shown in Figure 12, the Proposed Project site is currently zoned M-2 UFFD, Heavy Manufacturing, Urban Flood Fringe District. Section 1.050 of the Everett Zoning Code (EZC) states that the purpose of the industrial zones is to *"...provide for a variety of manufacturing, industrial, service, and office park uses and to establish development standards which assure quality site and building design compatible with surrounding areas."* The purpose of the M-2 district is to *"...provide for and protect certain areas of the City for heavy manufacturing"* (EZC 1.050D5). As the City's heaviest industrial zone, the M-2 district allows a wide variety of transportation activities, heavy manufacturing, warehousing/distribution, offices, retail uses, airplane/helicopter facilities, recycling facilities, petroleum refineries, smelting, drop forge industries, etc. General performance standards for light and glare, heat, noise, odor-air emissions, and vibrations-concussions are established in Section 39.140 of the Zoning Code.

Page III-89
This section has been changed to read:

3.7.2.2 Environmental Impacts

Public Access

~~As stated in Section 3.7.2.1, the Shoreline Master Program requires public access (physical and/or visual) to shorelines.~~

~~In this case, the ability to provide direct public access to the Riverside site is limited. The Bridge Crossing Agreement between Weyerhaeuser (the previous owner) and the Burlington Northern Railroad for bridge access to the site restricts use of the bridge to users and employees of the development. Access to the north and south ends of the site is limited by existing industrial use and wetlands, respectively. In addition, the Consent Decree associated with cleanup of this property restricts recreational use of this site.~~

~~To meet the requirements for public access, the City and Port have reviewed the status of planned trails in this vicinity; i.e., the Phase I trail along East Marine View Drive (to be constructed as part of the future street improvement project) and the Phase II trail along the waterfront.~~

~~The Proposed Project includes components of the proposed trail systems described in Section 3.7.2.1. In the southern portion of the site, within the area of non water dependent uses, a 12-foot public trail will be included in a 50-foot vegetative buffer adjacent to the shoreline edge. This trail will be continued through the northern portion of the site, but away from the shoreline edge due to the presence of water-dependent uses. This trail is consistent with the Everett Pedestrian and Bike Path Plan. A cross-section of that trail is shown in the Buffer Enhancement Plan, Figure 9b. The connection to a larger public trail system along the river (as previously described) remains uncertain; however, provision of the easement maintains the option for the future. In the interim, the trail will be available for use by employees within Riverside Business Park. The Port will also make a financial contribution to the City for use in development of the Phase I trail along East Marine View Drive.~~

As stated in Section 3.7.2.1, the Shoreline Master Program requires public access (physical and/or visual) to shorelines. In addition, the City of Everett's "*Public Access Plan for Everett's Snohomish Riverfront*" identifies a Phase II Conceptual Trail along the shoreline in the Riverside Business Park.

There are two factors restricting the ability of the Port of Everett to provide direct public access to the Riverside Business Park and along the conceptual riverfront trail system at the present time. Public access to the Riverside site in general is not allowed due to a private rail crossing agreement that was issued by Burlington Northern Railroad to Weyerhaeuser, and was assigned to the Port upon purchase of the site. In addition, the entire site is the subject of two Consent Decrees between Weyerhaeuser and the State of Washington Department of Ecology for the cleanup of hazardous materials on the site created by Weyerhaeuser's previous industrial uses. Both Consent Decrees restrict use of the property to "industrial" types of users. This is because the cleanup levels were completed based on "industrial" rather than "residential" standards. "Industrial" cleanup presumes that "adult workers," not children and general recreational users, will be on the property (see WAC 173-340-745). Therefore, public access to the property with this level of cleanup, for the most part, would not be allowed.

To meet the City's requirements for public access on this site, the City and Port of Everett have reviewed available options. After reviewing a variety of public access options, at this

time the Port is proposing to: 1) identify Ferry-Baker Island as a public beach/landing area for kayaks, canoes, etc.; 2) execute a Public Access Reservation Agreement to reserve the riverfront trail area in the southern portion of the site for possible future development as long as this is a component of the "*Public Access Plan*"; and 3) contribute funds for the acquisition of additional off-site public access.

Ferry Baker Island is an undeveloped island off the southern portion of the site. An area along the southern side of the island would be designated with signs as a landing area for kayakers and canoers. There would be no other improvements made to the island.

The Public Access Reservation agreement for the on-site trail will ensure that development of the Business Park will not eliminate the potential for future implementation of the "Riverfront Trail" if satisfactory assurances can be developed to protect human health given the cleanup levels of the Riverside site. In the southern portion of the site, in the area of non-water-dependent uses, reservation of a 12-foot wide trail will be included in the 50-foot vegetative buffer adjacent to the shoreline edge. A cross-section of the trail is shown in the Buffer Enhancement Plan, Figure 9b. In the northern portion of the site, in the area of water-dependent uses, the trail could be continued, but would be located away from the shoreline edge. The exact location of this portion of the trail will be determined during site development to coordinate with the location of roads and infrastructure.

For off-site public access, the Port will contribute funds in an amount equal to 2 percent of actual Port construction costs for the project infrastructure (roads, utilities, prescribed site work) toward acquisition of a new viewpoint along the northwest end of Alverson Boulevard. The proposed viewpoint consists of approximately four acres and is identified in the "*Everett Harborfront Public Access Capital Improvement Plan*" as "Viewpoint at Legion Park." Acquisition of this site provides for planned future public views of the Snohomish River and estuary, and Port Gardener Bay.

While a number of public access options remain available, the public access approaches identified above represent the Port's proposed alternative at this time. A final determination on the specific and more detailed public access proposal will be made as part of the shoreline permit review process for the Riverside Business Park.

Alternative 1 - No Water-Dependent Uses

Page III-90

Paragraph 1 has been changed to read:

With Alternative 1, the entire site would be designated for Commercial Development. This use regulation does not require water-dependent uses. The provision of public access serves as an alternative to the water-dependency requirement. ~~Public access would be provided via the pedestrian easement within the buffer in the southern portion of the site, as described above, and extended across the existing bulkhead in the northern portion of the site. Extension of the potential trail easement could serve on-site employees, but~~

~~would not change the existing limitations on public access to the site in general.~~ Public access would be provided in a manner similar to the Proposed Project: Ferry-Baker Island would be identified as a public beach/landing area for kayaks, canoes, etc.; a Public Access Reservation Agreement would be executed to reserve a riverfront trail area along the entire length of the site for possible future development as long as this is a component of the "*Public Access Plan*"; and funds would be contributed for the acquisition of additional off-site public access."

Page III-90
Paragraph 2 has been changed to read:

Alternative 2 - Single, Water-Dependent User and Business Park

This Alternative would also be consistent with the requirements of the Shoreline Master Program. As with the Proposed Project, ~~no public access along the shoreline would be provided within the northern portion of the site, but an easement for a pedestrian trail would be provided within the enhanced buffer in the southern portion of the site.~~ Ferry-Baker Island would be identified as a public beach/landing area for kayaks, canoes, etc.; a Public Access Reservation Agreement would be executed to reserve a riverfront trail area along the southern portion of the site for possible future development as long as this is a component of the "*Public Access Plan*"; and funds would be contributed for the acquisition of additional off-site public access.

While a number of public access options remain available, the public access approaches identified above represent the Port's proposed alternative at this time. A final determination on the specific and more detailed public access proposal will be made as part of the shoreline permit review process for the Riverside Business Park.

Page III-90
Paragraph 4 has been changed to read:

Alternative 3 - No Action

No development of the site at this time would retain future options for use of the shoreline, but would not be consistent with policies of the Master Program relating to use/reuse of areas where existing roads and utilities are available. No development of this site would increase development pressure on other industrial sites, many of which are also along shorelines. No additional public access to the River would be provided at this time.

Page III-134
Paragraph 5 has been changed to read:

In November 1998, the City modeled the existing system with the proposed 12-inch loop serving the Riverside development. The points of connection are at the site's north entrance and at 13th Street. The analysis indicates that the available on-site fire flow is limited to ~~3,000~~ 2,250 gpm based on the requirement to maintain a 20 psi residual throughout the system concurrent with delivery of fire flow. The controlling area is the residential area southeast of the American Legion Park, generally west of Broadway and north of 5th Street. This area is vulnerable to low pressures because it is situated on high ground. The results of the City modeling work is summarized in a November 2, 1998, letter.

Page III-139
Paragraph 2 has been changed to read:

Proposed

City modeling indicates the existing City system could deliver up to ~~3,000~~ 2,250 gpm fire flow at the Riverside site while maintaining adequate pressure residual in adjacent residential areas. Several scenarios were run to evaluate whether increasing the size of the proposed water main or increasing the size of existing and proposed water mains would address the low pressure concern at Legion Park. The analysis indicated that piping changes alone would not significantly improve pressure at Legion Park.

Paragraph 3 has been changed to read:

~~Installation of a booster pump station serving the residential area southeast of Legion Park may be required if the design fire flow at Riverside Business Park exceeds 3,000 gpm.~~
If fire flow exceeds 2,250 gpm, a private fire system will be provided, or alternatively, improvements will be made to the City's distribution system, if deemed acceptable by the City, to provide the required fire flows.

Page III-141
A new paragraph has been added to this section.

Natural Gas

There is currently no gas service to the Riverside site. Gas service was never extended as Weyerhaeuser used mill byproducts such as sawdust to heat facilities when the mill was still functioning.

Puget Sound Energy operates an existing 8-inch high pressure gas main situated in an easement to the northwest of the Riverside site. A reinforcement project consisting of a new high pressure line that is proposed to cross the Snohomish River in close proximity

to Riverside, is currently being developed. Construction is tentatively planned for the year 2000.

PART 2

COMMENTS AND RESPONSES

INTRODUCTION

This part contains all written and oral comments received from public agencies, interest groups, and individuals on the Draft SEIS, together with the Port's responses to those comments. Each comment letter or comment form is followed by the Port's responses, with responses numbered to correspond to the numbered comments. In addition, several comments were received that offered opposition or support to the proposed project, but did not contain comments directly relating to the Draft SEIS. These comments have been noted and are included in the record submitted to the Port Commissioners.

COMMENTS AND RESPONSES TO COMMENTS

February 18, 1999 Public Meeting:

Ann Robinson
Greg Kauffman
Greg Benson
Bessie Neighbors
David Shuman
Letter 6: John Markuson

Letters Received:

Private Citizens and Public Interest Groups

Letter 1: Imogene Knighthall
Letter 2: Greg Kauffman
Letter 3: Kurt Munnich
Letter 4: Ginger Decker
Letter 5: Adrian Magnuson-Whyte

City/Agency

Letter 6: City of Everett Planning and Community Development
Letter 7: City of Everett Engineering Public Services Department
Letter 8: State of Washington Department of Ecology
Letter 9: State of Washington Department of Fish and Wildlife
Letter 10: Puget Sound Energy

PUBLIC MEETING
COMMENTS AND RESPONSES

PORT OF EVERETT
FEBRUARY 18, 1999 PUBLIC MEETING

FOR COMMENT ON:
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR AMENDMENT TO THE SCHEME OF HARBOR IMPROVEMENTS FOR RIVERSIDE BUSINESS PARK

Ann Robinson of 1631 Cedar Street, Everett, Washington.

"I want to start out by saying I wish I had counted the number of times I heard the word mitigation. When I hear the word mitigation, that says to me that something bad or undesirable is going to happen, and the mitigation measures are to make it a little less bad. So, this is something I have learned over the years, and mitigation raises red flags with me. What I would like to have on this site is to let it revert to a natural state. I don't think that because it is zoned industrial, it necessarily has to be developed. We have the salmon restoration problems facing the state and just to let that place generate nothing at all negative for the salmon would be wonderful. People of the northeast area of Everett have been suffering for eight years because of the smelter site contamination. They have been through a tremendously difficult period, and it's not going to get any better. We hope to see some actual removal of soils starting in a few months, but what will happen over the next five to ten years we don't know. It seems as if they have enough to deal with without further impact on the area. The idea of 5,000 to 5,500 vehicle tripe per day on East Marine View Drive is absolutely unacceptable. I know this isn't what people wanted to hear, but this is the way I feel. Thank you." 1 2 3 4

Greg Kauffman of 1502 Rainier Avenue, chairman of Northeast Everett Community Organization.

"I feel this project is designed to dump this industrial project in northeast Everett. Northeast Everett has been the dumping ground for every negative project that needs a home. The only beneficiary of this project is going to be the Port of Everett. This will free up and industrial area that that have currently on this side and make this area on the West Marine View Drive area more user friendly for hospitality industry or shops, restaurants, hotels. Would like to find out if we already have people signed up that are getting ready to move. Would also like to find out whether or not this project is going to pay for itself or if it's going to continue to be funded by tax dollars. This project will negatively affect property values, it will quality of life, noise, air pollution, traffic. This is going to destroy northeast Everett, and whoever thought it was going to be good for the City by adding jobs back into a residential area, you know we have enough of the low-paying jobs in northeast Everett. We have McDonalds. I mean it's there. What 5 6 7 8

are you going to put over there, a pulp mill. This is ridiculous and people should have come to us before they spent $11 million on this project. Totally against it. 9

Greg Benson of 1522 Rainier Avenue.

"I also share the concerns of the traffic if the studies say fall short and if the traffic exceeds the limits, what would happen? Are there some kinds of alternatives to traffic where the road would be improved, West Marine View Drive, or another access would be built. Another problem is and then if the road is improved and allows for more traffic, a fear there would be some and I think this goes into what Greg was saying, there might be an urban creep up the hill where houses are removed so that a developer could put in a multi-family dwelling or dwellings and then we have more traffic and property values continue to plummet. I think this whole development could be opening a 'can of worms.' Thank you." 10 11

Bessie Neighbors of 1317 Poplar with the Northeast Neighborhood Community Organization.

"I may be repeating and saying the same as Greg Kauffman, our chairman said and Ann Robeson, and even Greg Benson, but I've lived in the neighborhood for years and I know they say it's an industrial area. But, when you have it all around you, on top of you, of different other businesses and one thing and another, and you have it in your home, materials settling or outside your home and when we all work about when Rabanco wanted to have the garbage transfer study and having again where Delda (?) went completely out, but that had eliminated crashing noises that would unless you were stone deaf, that would keep you awake. We have the asphalt to where when they release whatever they release, the asphalt plant by Gais Bakery, and when they release that it makes an oily residue that even comes in the house and regardless how neat you are or whatever, you have that on your appliances. You are breathing it. And the traffic, we have enough traffic and account of not because putting down the freeway, but a lot come through up on the other streets and the things that are required like garbage and you name it. That would create school children getting to Hawthorne and even walking on East Marine View Drive to get across there, you take your life in your hands. It has been a dumping area for years and they not started with Weyerhaeuser and to add to that where the residents are the ones to be, if you want to call it, illegal in the way of ordinances and laws, I feel we are becoming victims on our own property in our own neighborhood. If it created work that would be a long time thing and higher numbers or not take away peoples' sidewalks or lawns, and it's like uprooting and saying you locate somewhere else like when the Longshoremen went out or this or that or major jobs. I'm one that says I object all the way around." 12 13 14 15 16 17

David Shuman of 737 - 33rd Street on Rucker Hill.

"I've lived here in Everett since 1982 and so in the course of living here I've walked along the water front, you know along the river and rode my bike and things, and of course you've got to do it totally illegally because of all the private ownership that varies depending on where you go. So, I just want to put in my comment that public access eventually some sort of waterfront trail all around the city of Everett when it gets pieced together over the years is going to be a really wonderful thing and something that most cities don't have the geographical opportunity to create, and it's too bad we can't build it all at once but for this project and future ones we need to keep in mind that we should at least have the easements there and considered so we can put together a good river front trail as years go by." 18

John Markuson of 1609 Baker.

"I am the co-chair of the Northeast Everett Community Organization, and I had asked some questions before you turned on the microphone, but I would echo the heartfelt concerns of most of the folks, in fact, all of the folks who stood up here at this microphone. I notice in looking out here at the audience that there are probably 25 people here and I'm speaking to the audience right now. I'd like a show of hands of those who are not affiliated with the City or with the Port of Everett. Could you raise your hands please, I see in that there are probably around 20 people. My question to you folks is, "How many of you folks are for this project as it has been presented, the Preferred Project as it has been presented?" I see four hands that are up. Now, let's go to the folks that say "No." I had a bunch of questions about this and I just don't know exactly what to say. Raise your hands please. I see ten hands. OK, that's all I wanted to say. That's my statement. Thank you." 19

bjr\wf\portevt\riversid\eis\meetings\0218publ.doc

Responses to Comments Received at Open House on the Draft Supplemental EIS

Ann Robinson

1. Your concern regarding the necessity for mitigating measures is noted. Per WAC 197-11-768 (*State Environmental Policy Act, SEPA Rules*), "mitigations" are defined as:

   (1) Avoiding the impact altogether by not taking a certain action or parts of an action;
   (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;
   (3) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
   (4) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
   (5) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or
   (6) Monitoring the impact and taking appropriate corrective measures.

2. To date there has been no interest expressed by any public agency or private group to acquire the Riverside site for natural restoration. The City of Everett designates and proscribes land use, including future park sites, through it's Comprehensive Plan. The *1994 Everett Comprehensive Plan* designates the site as "Heavy Industrial", with an "Urban - Multi-Use" shoreline overlay. Accordingly, the site is industrially zoned. Also, given the requirements of the Department of Ecology Consent Decree related to clean-up of this site and the prohibition against future recreational use due to the clean-up levels, it is unlikely the City or any other agency or group would choose this site for a park. See Section 3.1.2 of the Draft SEIS.

3. Your comments regarding the impacts of the smelter contamination on the northeast Everett community are noted and have been included in the record.

4. Your comments regarding the increased vehicle traffic on East Marine View Drive are noted and have been included in the record. Also, please reference Section 3.9.2 of the Draft SEIS regarding the impacts of project-related traffic on East Marine View Drive.

Greg Kauffman

5. The Riverside site is intended to attract industrial development in an attractive business park setting. No specific users have been identified at this time.

6. The project is intended to provide revenue for the Port of Everett and economic growth for the community. The project feasibility studies indicate the project will meet the revenue/economic goals. The Port will not continue to spend money on the project if it does not generate sufficient revenue. The project can be phased, if necessary.

7. Your comments concerning the impact on the quality of life in Northeast Everett are noted and have been included in the record. The project's impacts to land use, noise, air quality, and traffic are described in Sections 3.6.2, 3.5.2, 3.2.2, and 3.9.2 of the Draft SEIS, respectively.

8. One objective of the Riverside Business Park project is to provide family wage jobs.

9. Your opposition to the project is noted and has been included in the record.

Greg Benson

10. Traffic issues will continue to be reviewed throughout the development permitting process. As specific tenants within the site are identified, projected traffic volumes will be determined. If traffic is projected to increase beyond that described in the current traffic study, additional traffic analysis would be required, as well as additional mitigation.

11. Your comment regarding the issue of "urban creep" into existing residential areas is noted. Land use planning and land development/redevelopment within the City is regulated through the *1994 Everett Comprehensive Plan* and *Everett Zoning Ordinance* as amended. These documents were adopted after extensive public involvement. Any proposed changes in land use inconsistent with the current Comprehensive Plan and zoning ordinance would require public hearings.

Bessie Neighbors

12. You comments regarding living adjacent to an industrial/business area are noted and are included in the record.

13. Your comments regarding the existing traffic are noted and are included in the record. Also, please refer to Section 3.9.2 of the Draft SEIS regarding traffic impacts.

14. Your comment regarding school children walking on East Marine View Drive is noted and included in the record. The City of Everett has just begun a design study for improvements (including pedestrian improvements) to this arterial.

15. Your comments regarding the status of the residents is noted and included in the record.

16. One important objective of the Riverside Business Park project is creation of family-wage jobs.

17. Your objection to the project is noted and included in the record.

David Shuman

18. Your comments regarding the desirability of a public waterfront trail are noted and are included in the record.

John Markuson

19. Your opposition, and the opposition of certain audience members to the project is noted and included in the record.

PRIVATE CITIZEN, AGENCY, AND INTEREST GROUPS LETTER COMMENTS AND RESPONSES

COMMENT LETTER NO. 1

Feb 17-99

3010-16th St.
Everett, Wa. 98201

"Draft Seis"
Port of Everett:

Regarding: "Draft Seis" proposed plan on Snohomish River:
I think its a shame to make this beautiful piece of property into a business park. If it is the spot with a bay view at the mouth of the river - I think it should be a big waterfront recreational area for everyones use. I'm sure the "powers that be" see it as great new income + taxable income. 1
For many years the beautiful waterfronts have been marred by Railroad tracks and now this industrial fire.
I have lived in this area since the 1940's. Sometimes visionaries do more harm than good. Sincerely

my vote is no!! Imogene Knightall

Letter 1: Imogene Knightall
February 17, 1999

Comment 1. If the Riverside site is the spot with a Bay view at the mouth of the river, it should be a big waterfront recreational area for everyone's use.

Response 1. *The Riverside site is the site of the old Weyerhaeuser Everett East Mill. The site is largely devoid of vegetation, and soil contamination related to the lumber processing operations is being removed in accordance with the State of Washington Model Toxics Control Act (MTCA). The site is designated as "Heavy Industrial" on the City's Comprehensive Plan, and similarly zoned. Future use of the site for recreational purposes would be prohibited since the site is restricted to industrial use as part of the Department of Ecology Consent Decree controlling clean-up under MTCA.*

COMMENT LETTER NO. 2

PORT OF EVERETT
FEBRUARY 18, 1999 PUBLIC MEETING

FOR COMMENT ON:
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR AMENDMENT TO THE SCHEME OF HARBOR IMPROVEMENTS FOR RIVERSIDE BUSINESS PARK

On January 29, 1999, the Port of Everett issued a Draft SEIS addressing the above project. The Draft SEIS addresses impacts to the natural environment (earth, air quality, water/wetlands, plants and animals, and the marine environment) and the built environment (noise, land use, consistency with plans and policies, light and glare/aesthetics, transportation, public services, and utilities) resulting from construction of this proposed 78 acre business park. The Draft SEIS also addresses the impacts of two alternative scenarios of industrial use and a No-Build alternative.

Citizens, community groups, tribes, and agencies interested in this project are invited to review the Draft SEIS and provide comment on its adequacy and accuracy. Comments may be turned in at this meeting or directed to: **Mr. Robert McChesney, Port of Everett, P.O. Box 538, Everett, WA 98206. All comments must be received by March 1, 1999.** Use the back of this page for additional comments.

COMMENTS:

This project is designed to dump industrial users into NE Everett. NE Everett has been used for every negative project that needs a home. 1

The only beneficiary of this project is the Port of Everett. Having this industrial area available will allow more hospitable uses of West Marine View Dr. I.E. Hotels Restaurants shops ect.

Remember - Port of Everett officials are elected.

This project will effect property values.

Name: GREG KAUFFMAN Date 2-18-99

Address: 1502 RAINIER Phone 425 252 3146

over

quality of life, noise, air pollution, 2
and traffic.

This project will destroy the residential NE Everett community.

Letter 2: Greg Kauffman
February 18, 1999

Comment 1. This project is designed to "dump" industrial uses into Northeast Everett.

Response 1. *Please refer to Response 5 of the Open House comments.*

Comment 2. This project will affect property values, the general quality of life, and will destroy the Northeast Everett residential community.

Response 2. *Your comments are noted and included in the record. Also, please refer to Response 7 of the Open House comments.*

COMMENT LETTER NO. 3

PORT OF EVERETT
FEBRUARY 18, 1999 PUBLIC MEETING

FOR COMMENT ON:
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR AMENDMENT TO THE SCHEME OF HARBOR IMPROVEMENTS FOR RIVERSIDE BUSINESS PARK

On January 29, 1999, the Port of Everett issued a Draft SEIS addressing the above project. The Draft SEIS addresses impacts to the natural environment (earth, air quality, water/wetlands, plants and animals, and the marine environment) and the built environment (noise, land use, consistency with plans and policies, light and glare/aesthetics, transportation, public services, and utilities) resulting from construction of this proposed 78 acre business park. The Draft SEIS also addresses the impacts of two alternative scenarios of industrial use and a No-Build alternative.

Citizens, community groups, tribes, and agencies interested in this project are invited to review the Draft SEIS and provide comment on its adequacy and accuracy. Comments may be turned in at this meeting or directed to: **Mr. Robert McChesney, Port of Everett, P.O. Box 538, Everett, WA 98206. All comments must be received by March 1, 1999.** Use the back of this page for additional comments.

COMMENTS:

Traffic – depending on the ultimate use of the project, it seems likely that improvements to East Marine View Drive would be necessary for safety. 1

Water-oriented usage would seem to be required by the Shoreline Master Program, at least along the river frontage. Warehouses would not seem appropriate here. * 2

Public access should be requirement, but would need to be located so that safety of the public is maintained. 3

Traffic-Demand Management and Commute Trip Reduction should apply to operations located on the site, based on adopted City Ordinance. 4

Name: Kurt Munnich Date 2-18-99

Address: 4704 W. Glenhaven Dr Phone 425-259-0728
Everett, WA 98203

* Prefer Alternative #2 but [illegible] almost concrete batch plant.

Letter 3: Kurt Munnich
February 18, 1999

Comment 1. It seems likely that improvements to East Marine View Drive will be necessary for safety.

Response 1. *The City of Everett has begun a design study to determine future improvements to East Marine View Drive. Section 3.9.3 of the Draft SEIS describes proposed mitigations associated with the Riverside project.*

Comment 2. Water-oriented usage seems to be required by the Shoreline Master program. Warehouses would not be appropriate.

Response 2. *Section 3.7.2.1 of the Draft SEIS notes that the City of Everett has agreed to divide the site into two shoreline use areas due to the feasibility of water access. The northern portion of the site, where barge access is feasible, is designated "Ports and Water-Related Industry," which requires water-related uses within 200 feet of the shoreline. The southern portion of the site, where barge access is not feasible, is designated "Commercial," and no water-related uses are required.*

Comment 3. Public access should be required and the safety of the public maintained.

Response 3. *The City of Everett Shoreline Master Program requires that visual and/or physical public access to the shoreline be provided. Section 3.7.2.1 of the Draft SEIS discusses the requirements of the Shoreline Master Program. The Port of Everett is committed to working with the City to assure that the Riverside project meets City requirements for safe public access, given the existing and past industrial use of this site. Please refer to the revised Section 3.7.2.2 Shoreline Master Program - Environmental Impacts, Public Access of this Final SEIS and to Response 1 to the City of Everett Planning and Community Development letter regarding public access.*

Comment 4. Traffic Demand Management and Commute Trip Reduction should apply to uses within the site.

Response 4. *Your comment is noted and included in the record. The City of Everett Commuter Trip Reduction Ordinance requires employers with 100 or more affected employees to develop and implement programs encouraging employees to reduce vehicle miles traveled and minimize their use of single occupant vehicles. Employers submit their programs to the City for review and approval and then provide annual progress reports. Employers within the Riverside Business Park will be subject to this City ordinance.*

COMMENT LETTER NO. 4

PORT OF EVERETT
FEBRUARY 18, 1999 PUBLIC MEETING

FOR COMMENT ON:
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR AMENDMENT TO THE SCHEME OF HARBOR IMPROVEMENTS FOR RIVERSIDE BUSINESS PARK

On January 29, 1999, the Port of Everett issued a Draft SEIS addressing the above project. The Draft SEIS addresses impacts to the natural environment (earth, air quality, water/wetlands, plants and animals, and the marine environment) and the built environment (noise, land use, consistency with plans and policies, light and glare/aesthetics, transportation, public services, and utilities) resulting from construction of this proposed 78 acre business park. The Draft SEIS also addresses the impacts of two alternative scenarios of industrial use and a No-Build alternative.

Citizens, community groups, tribes, and agencies interested in this project are invited to review the Draft SEIS and provide comment on its adequacy and accuracy. Comments may be turned in at this meeting or directed to: **Mr. Robert McChesney, Port of Everett, P.O. Box 538, Everett, WA 98206. All comments must be received by March 1, 1999.** Use the back of this page for additional comments.

COMMENTS:

Please See Attached

Name: Ginger Deckes

Date 2-22-99

Address: 3221 1/2 Kromer Av
Everett WA 98201

Phone 425-258-3443

February 28, 1999

Waterfront is beautiful and magical.. The access and viewing of our waterways and the waterfowl they support is important to our quality of life. It is sad that Everett has devoted so much of it's waterfront to industry. If there really is a need for more industry, and this proposed park is the place to put it, I hope that it be done in a way that is consistent with a vision of waterfront access for the public as well as the restoration and preservation of a natural and healthy waterfront. 1

Public access along the waterfront within this development is very important to me. I understand that public access has been planned for in the proposed industrial park, but I have two concerns about the current proposal. There are still unresolved issues as to how the public will get across the railroads. I believe the Port has the ability to negotiate this access and am requesting that they do so soon. I also noticed that a large section of the park would not allow public access near the waterfront because it provides for industries with need for water access. I would be in favor of such industries that are 'public friendly' and still allow for the public to continue their access along the entire waterfront of this area. An example of a public friendly industry might be a kyak/canoe rental shop, which is a needed service in this area. 2

My final comment concerns the plan to block industrial light/glare with natural vegetation. I sincerely hope this is done well and that this park does not become another eyesore on the waterfront. 3

Thank you for taking public comment on this and considering my concerns. Please plan for and enforce your plan to be sensitive to these issues.

Ginger L Decker

Ginger L. Decker
3221 ½ Kromer Ave
Everett, WA 98201

(425)258-3443

Letter 4: Ginger Decker
February 22, 1999

Comment 1. The access and viewing of our waterways and waterfowl is important to our quality of life. Too much of Everett's waterfront is devoted to industry. If this site must be industrial, it should be accomplished consistent with a vision of waterfront public access and the restoration/preservation of a natural and healthy waterfront.

Response 1. *Land use and development along the City's waterfront is guided and regulated by both the City's Comprehensive Plan and Shoreline Master Program. These documents designate areas for industrial, commercial, residential, and recreational use, as well as provide policies regarding issues such as public waterfront access. The requirements of the Everett Shoreline Master Program regarding public access are discussed in Section 3.7.2.1 of the Draft SEIS.*

Comment 2. Public access is important. It is still unresolved how the public will access this site and how the public will access the waterfront in the northern portion of the site.

Response 2. *The Port of Everett is committed to working with the City to provide safe and adequate public access. Public access options are now being proposed; the issue will be resolved during the permitting phase of development. Please see Response 1 to the City of Everett Planning and Community Development letter regarding public access. See also Section 3.7.2.2 of the Final SEIS.*

Comment 3. The industrial light/glare should be blocked by natural vegetation so that the project does not become another eyesore on the waterfront.

Response 3. *Your comment is noted and is included in the record. Please refer to Section 3.8 of the Draft SEIS regarding light and glare.*

COMMENT LETTER NO. 5

RECEIVED
MAR 1 1999

Mr. Adrian R. Magnuson-Whyte
1611 Virginia Avenue
Everett, WA 98201

February 26, 1999

Port of Everett
Attn.: Mr. John Mohr, Executive Director
Marine View Reception and Conference Center
404 – 14th Street
Everett, WA 98201

Dear Mr. Mohr:

Re: Riverside Industrial Park Draft Supplemental Environmental Impact Statement

Thank you for the opportunity to comment on the above-mentioned statement.

I would like to stress that, on the whole, I am pleased with the possibilities that the development of the Riverside Industrial Park will offer the neighborhood and city in general, however, I would like to make comments on the following three issues.

1. I do not believe that the current thinking on how to get the necessary volume of traffic both in and out of the neighborhood is the best for either the neighborhood or the business park (plus the inevitable future developments on the 'brown field' sites available nearby) itself.

   When developing such a site one of the most important issues is how to get the materials in and the product out of the facility in the most cost-effective manner possible. Thankfully, these days, a consideration in the methodology of establishing the cost-effectiveness is the environmental issue. Both in terms of the ecosystem in general and the human population surrounding any development.

   While the broader environmental issue is vitally important, I think the main problem is that the opportunity to provide better access, to allow the maximum development of the 'brown field' sites available in the nearby area, is potentially being lost. This access would allow quicker, more efficient access to the site (and others) while at the same time lessening the impact of the traffic on the surrounding neighborhoods. I refer to the Dagma Landing bridge (I have probably spelled the name incorrectly) that currently serves just two entities. If this access was developed (in the same spirit that new on/off-ramps are being developed in Seattle for Amgen and in the Nasqually area for Intel, etc.) then cost and other access/environmental issues could be reduced. Hopefully to the point that the park would be welcomed by a far wider segment of the population than was visible at the public meeting recently (4 private citizens in favor and 20 private citizens against). 1

We would be able to move those trucks and cars in and out far more efficiently AND the improved access would allow the development of any areas nearby. I heard at the Public Meeting that some individuals believe that the idea is to move the industrial businesses from West Marine View Drive to business parks such as the one being proposed. If access were improved via a direct link to the Interstate then that would be a possibility without any dire consequences for the neighborhood. The improved access would make the park far more exciting to a potential tenant and provide good access for future developments along the West Marine Drive.

I wish to stress that I am in favor of considerate developments. However, I always want to stress that we should not be looking at this development in isolation. Get the improved access and you would be in a position to open up the industrial area with minimum impact. We need to look at the impact on the neighborhood but also beyond just the Riverside Industrial Park. The local tribes know that the secret to their proposed business park is good and easy access. I would like to recommend that the Port of Everett take a similar AND long-term viewpoint. If it does then I believe that the Riverside Industrial Park will only be the start of a successful development of the area. Successful not only for the Port of Everett, but also the surrounding neighborhoods and the city/county/state at large.

2. The other main issue that I wish to address is the fact that I did not see in the plan any attempt to ensure that the possible tenants are not 'dirty' neighbors. I would like to be assured that the neighborhoods would not be host to industries that contaminate the local environment or create an unpleasant environment (smells, noise, etc.). I feel that the plan did not address that problem adequately. 2

3. The last issue that I would like to address is that as the Northeast and Riverside neighborhoods are being impacted by the development, that the newly created jobs are made available to local residents as a matter of priority. Obviously, if a company is relocating and the previously hired workers are still able to keep their jobs, then so be it. However, a number of new jobs will be created and we realize that they will, on the whole, not be jobs that require much more than a HS Diploma or Associates Degree level of education. With all due respect to my fellow residents, the level of education within the surrounding neighborhoods is lower than more affluent neighborhoods and as such, the jobs being created on their doorsteps should be offered to the local residents (who fit all other qualifications, etc.) first. 3

I would like to take this opportunity to thank you for the ability to make a comment on the impact statement. I would like to also take this opportunity to push again the idea of Dagma Landing as a direct means of access to Interstate 5. Please look to the future and the wonderful opportunities that access will provide this city and the Port of Everett.

Yours
Sincerely

Mr. Adrian R. Magnuson-Whyte

Letter 5: Mr. Adrian Magnuson-White
February 26, 1999

Comment 1. The proposed site access is not best for either the Business Park or the neighborhood. The opportunity to provide better access to allow the maximum development of other "brownfield sites" in the nearby area is potentially being lost. Use of the Dagmar Landing bridge would reduce the cost and other access/environmental issues. Improved access to the Interstate would be good for the neighborhood, make Riverside more exciting to a potential tenant, and provide good access for future developments along West Marine View Drive. The Port should recognize the importance of good and easy access and take the long-term viewpoint.

Response 1. *The Port of Everett recognizes the importance of good site access. Traffic studies prepared for Riverside Business Park indicate that both the current Interstate 5 access via East Marine View Drive is less than four minutes away, and that East Marine View Drive is capable of accommodating the additional traffic, in conformance with City standards, if a signal is installed at the new site access driveway.*

Regarding long-range transportation planning, the possibility of a new northerly connection to Interstate 5 via Smith Island has been discussed as a possibility if new development on Smith Island were to require it. The new development would likely be responsible for costs associated with an improved access to SR 529, widening and improvement to the surface streets connecting to Interstate 5, and a new interchange at Interstate 5. Neither the City or the State Department of Transportation have plans for this access and new interchange. No feasibility studies have been completed, so no information is available regarding cost, impacts to environmentally sensitive areas, impacts to traffic volumes on existing arterials, etc. If, at some time in the future there is sufficient demand for this new access, the Riverside Business Park project may benefit from such an improvement.. However, based upon the traffic study prepared for the DSEIS, by itself, the Riverside Business Park may not generate sufficient traffic to justify the cost and impact of creating a new interchange.

The project trip distribution as shown in Figure 20 of the Draft SEIS shows that only 17 percent of the projected Riverside traffic heads to the north from the site. A portion of that 17 percent would continue on SR 529 to Marysville rather than to Interstate 5. The data indicates that the current Riverside access to Interstate 5 is less than four minutes away, and the majority of site traffic is oriented to the south. Based on the information available to date, the northerly access would not provide an advantage to the Riverside site. Therefore, until such time as other developments are planned for the Smith Island area, or for the area that would benefit from a northern interchange, there are no plans to pursue such an interchange for I-5.

Comment 2. The neighborhood should not be host to industries that contaminate the local environment or create an unpleasant environment. The Plan does not address this adequately.

Response 2. *All development must comply with standards set forth in the City of Everett Zoning Ordinance. Section 39.140 of the Zoning Ordinance provides performance regulations for light and glare, heat, noise, odor-air, and vibration-concussion.*

Comment 3. Because the Northeast and Riverside neighborhoods are being impacted by the development, the newly created jobs should first be made available to local residents.

Response 3. *The hiring of employees is the responsibility of the individual tenants that locate within Riverside Business Park and must be consistent with all applicable laws.*

COMMENT LETTER NO. 6

Paul A. Roberts
Director

PLANNING AND COMMUNITY DEVELOPMENT
EVERETT

March 3, 1999

Mr. John Mohr, Executive Director
Port of Everett
P. O. Box 538
Everett, WA 98206

RE: Response to Draft Supplemental Environmental Impact Statement for Riverside Business Park

Dear John,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the "Port of Everett: Amendment to Comprehensive Scheme of Harbor Improvements for Riverside Business Park." Other departments in the City may be providing comments under separate cover. This document provides a review of the impacts addressed during the scoping process related to this project.

One issue that the Planning Department would like to address is public access. In your recent correspondence, the Port has indicated that substantial restrictions or limitations to the provisions of public access exist in the railroad crossing agreement with Burlington Northern-Santa Fe and the Consent Decree with the Department of Ecology (DOE) for site remediation under MTCA. These limitations may preclude the provision of public access; however, additional information will be required.

With respect to alternatives for public access related to this project, the Port should consider that if public access cannot be provided consistent with the applicable plan ("A Pedestrian and Public Access Plan for Everett Riverfront"), the Port should propose specific, meaningful alternative public access related to this project. 1

With respect to this specific project, the City recognizes that there may be encumbrances against this property that preclude public access literally consistent with the referenced Plan. Your cooperation will be critical; however, in defining an acceptable alternative to the City that complies with the intent of the City's shoreline policy.

If you have any questions about the City's position related to your proposal, please contact me or Gerry Ervine at (425)257-8731.

Sincerely,

Paul A. Roberts, Director

CITY OF EVERETT
2930 Wetmore Avenue, Suite 8-A • Everett, WA 98201 • (425) 257-8731 • Fax (425) 257-8742

Letter 6: City of Everett Planning and Community Development
Dated March 3, 1999

Comment 1. The Planning Department is concerned about the issue of public access. If public access cannot be provided consistent with "A Pedestrian and Public Access Plan for Everett Riverfront," the Port should propose specific, meaningful alternative public access related to this project. The City recognizes that there may be encumbrances against this property that preclude public access consistent with the above Plan. The Port's cooperation is critical, however, in defining an acceptable alternative that complies with the intent of the City's shoreline policy.

Response 1. *Your comments regarding public access are noted and included in the record. After further discussions with the City, a revised proposal for public access was developed. Please refer to the Errata Sheet for the new Section 3.7.2.2, Public Access.*

ENGINEERING/PUBLIC SERVICES DEPARTMENT

MEMORANDUM

COMMENT LETTER NO. 7

TO: Robert McChesney, Port of Everett
Gerry Ervine, Planning Department

FROM: Engineering/Public Services Department
KB

DATE: March 1, 1999

SUBJECT: Port of Everett EIS, Riverside Business Park

PROPOSAL: Master plan for phased manufacturing, industrial and warehouse/distribution business park

LOCATION: 700 Block of E Marine View Drive

A review of this project's SEIS by the Engineering/Public Services Department indicates that the following concerns should be addressed in the final document.

1. On page III-134 of the draft SEIS, the conclusions of modeling work done by the City are stated incorrectly. The SEIS incorrectly states that the available on-site fire flow is limited to 3,000 gpm based on the requirement to maintain a 20 psi residual pressure throughout the system concurrent with the delivery of fire flow. The available on-site fire flow is 2,250 gpm based on this requirement. 1

2. On page III-139, installation of a booster pump station to serve the problem residential area is proposed as a mitigating measure. This measure is not acceptable to the City. Since required fire flows will almost certainly exceed the 2,250 gpm that is available, other options must be explored. In addition, since the availability of flow to the site is restricted by the impacts off-site, the proposed system must prevent more than 2,250 gpm from being drawn at the site. 2

3. To address the above issues, the City will require a private fire system to be constructed on this site if required fire flow exceeds 2,250 gpm. The 12-inch looped water main will be a public main, but no fire hydrants may be connected to this main. Individual water meters for domestic and building sprinkler use will be required for tenants of the park. 3

   Possible alternatives to meet this requirement may include the following:

   a. The source of water for the private fire system may be Snohomish estuary water pumped directly during a fire situation.

b. The private fire system may be supplied from a storage tank on site. The storage tank may either be filled with Snohomish estuary water or metered water from the public main. If the storage tank is filled with metered water from the public main, an air gap will be required between the public main and the tank and the connection to the public main must be sized to restrict the available flow to the tank.

c. A method for providing water to the hydrants for this site would be utilization of the existing 40" steel water transmission line that is within the vicinity of this site. Any cost associated with connections to this line and any work done to the 40" to make it useful for this purpose must be born by the proponent of this project. This connection may require payment of a latecomer charge to be passed-through to Kimberly-Clark based on expected water usage.

4. The City is concerned about the potential for odors from the sewer force main's discharge at Butler Street, especially for initially low system flows, before the site is built out. The draft SEIS discusses this issue on page III-140 and proposes to increase the frequency of pump cycles during the early phases of development. The City shall require a maximum wet well detention time of 4 hours in order to minimize odors at the sewage discharge location to the City's public main at Butler. And if increasing the pump cycles in this way does not avoid an odor problem, or if subsequent users of the site will or have sewage discharges that result in odor problems, installation of odor control facilities at Butler or metered application of oxidants at the last site lift station by the Port of Everett (measures discussed on page III-141) shall be required. 4

5. The SEIS should state that the stormwater treatment facilities on the site shall be sized to treat the runoff from the new site bridge in accordance with City standards. 5

6. The SEIS should state that special charges for connection to the sewer and water systems in accordance with Ordinance 1998-94 and subsequent revision are applicable. These charges are based on projected water usage and can be substantial. Applicant is encouraged to obtain a copy of the Ordinance and determine estimated charges prior to building permit application. The actual charges shall be computed by the Public Works Department per the ordinance in effect at the time and according to the information on the approved plans at the time of building permit issuance. 6

KB:judyc(febsepa.6)

Letter 7: City of Everett Engineering Public Services Department
Dated March 1, 1999

Comment 1. Based on City requirements, the available on-site fire flow is 2,250 gpm, not 3,000 gpm as stated in the Draft SEIS.

Response 1. *The Port concurs that the available fire flow is limited to 2,250 gpm with the planned connections to the City's system.*

Comment 2. Installation of a booster pump station to serve residential areas is not acceptable to the City. In addition, the proposed fire flow system must prevent more than 2,250 gpm from being drawn from the site.

Response 2. *The Port understands that a booster pump to increase the City's system capacity is not acceptable to the City for various maintenance and intermittent use issues. Flow from the City's system will be restricted and/or regulated to ensure minimum pressures are maintained in the remainder of the City's system.*

Comment 3. The City will require a private fire system to be constructed on this site if required fire flow exceeds 2,250 gpm.

Response 3. *If fire flows exceed 2,250 gpm, a private fire system will be provided, or alternatively, improvements may be made to the City's distribution system, if deemed acceptable by the City, to provide the required fire flows. Individual tenant developers will be responsible to provide meters for domestic and building sprinkler use.*

Comment 4. The City is concerned about the potential for odors from the sewer force main's discharge at Butler Street, especially for initially low system flows.

Response 4. *The Port will design the lift stations to pump a minimum of every four hours to reduce odor from the system. If odor is a problem in the future, further steps will be taken to reduce the odor as discussed in the DSEIS Section 3.10.4.*

Comment 5. The SEIS should state that on-site stormwater treatment facilities shall be sized to treat the runoff from the new site bridge in accordance with City standards.

Response 5. *The Port concurs that the stormwater treatment facilities will be sized to treat the runoff from the new site bridge in accordance with City standards.*

Comment 6. The SEIS should state that special charges for connection to the sewer and water systems in accordance with Ordinance 1998-94 and subsequent revision are applicable.

Response 6. *Your comment on Special Charges for connection to the sewer and water systems is acknowledged. These costs will be charged to and paid by the individual developers as buildings are constructed on the site and service connections are made to the main systems. The Port of*

Everett will not be responsible to pay any special charges, unless they construct a building on site and connect to the water and sewer mains.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

COMMENT LETTER NO. 8

RECEIVED
MAR 1 1999

March 1, 1999

Robert McChesney
Port of Everett
PO Box 538
Everett, WA 98206

Dear Mr. McChesney:

Re: Amendment to Comprehensive Scheme of Harbor Improvements for Riverside Business Park, Draft Supplemental Environment Impact Statement, Port of Everett - Applicant

Thank you for the opportunity to comment on the above-referenced document. Ecology respectfully submits the following comments:

1. Water-dependent uses. The Everett Shoreline Master Program (ESMP) clearly states that "activities locating within 200 feet of the ordinary high water mark **shall** be water-dependent" (see Ports and Water-Related Industries - Use Regulation #1, page IV-45). There are no provisions in the ESMP use regulations for over-looking this requirement if a vegetated buffer is proposed. Therefore, any proposal for non-water-dependent uses within 200 feet of this shoreline (along the entire length of the property) would require a shoreline master program amendment. Given the environmental constraints of the subject site, it appears that such an amendment may be appropriate for this property. 1

2. Dredging. Even though sampling locations showed elevated levels of contaminants, and the SEIS discusses higher levels of contaminants in association with localized seeps and storm drain outfalls, the SEIS provides no analysis of the impacts of dredging that would be required if the site is redeveloped with water-dependent uses. As the need for dredging is a key difference between the Proposed Project, Alternative 1 and Alternative 2, this omission is not acceptable.

Establishment of a buffer along the northern half of the parcel (as described under Alternative 1) would likely involve some work below the ordinary high water mark. Therefore, it is not realistic to assume that impacts of Alternative 1 and Alternative 2 would be the same as those for the Proposed Project, as stated on page III-16, bottom of page. Without adequate information concerning the differences in environmental impacts between water-dependent and non-water-dependent uses, there is no basis for analyzing impacts between the alternatives. 2

The present EIS (and not some later phase) should present a likely scenario for dredging

requirements and other in-water activities associated with water-dependent uses. The dredging analysis should include a summary of previous sediment sampling in the area to be dredged, including sediment quality at the exposed depths. Aquatic habitat impacts of dredging, bulkhead construction, and prop scour associated with barges being maneuvered to and from the site should also be addressed. A discussion of disposal requirements under PSDDA should be included.

3. Avoidance of piecemeal site evaluation. Under the Proposed Project alternative, development would occur within 200 feet of the ordinary high water mark (establishment of a buffer, a public access trail, roads, stormwater management, commercial uses and their associated structures). Therefore, to say that no development is to take place with the 200-foot shoreline environment is not an accurate statement. To avoid piecemealing, improvements to all portions of the shoreline should be considered in the present analysis of alternatives. 3

4. Wetland C buffer. The 50-foot buffer proposed for the southern shoreline portion of the parcel (identified as Wetland C) is not supported by best available science. Under the Washington Department of Fish and Wildlife *"Priority Habitat Management Recommendations: Riparian"*, a minimum 250-foot buffer is indicated for Type I and II streams and shorelines of statewide significance. The subject 50-foot buffer would therefore fail to satisfy the ESMP requirement under General Regulations of Uses #6, p. IV-7 (referred to on page III-39 of the SEIS). Under this regulation, a landscaping plan is required that is in "scale and harmony" with the proposed activities and will act as a buffer to adjacent properties, in this case, a critical salmonid-bearing stream. Additional language in the Conservation Element of the ESMP (page II-14) also supports best available science restoration standards. 4

5. Bulkhead repairs. Although the SEIS states that under the Proposed Project alternative future repairs to the bulkhead in the central and northern portions of the site are anticipated, there is no information provided regarding the environmental impacts of these repairs. The SEIS discusses localized seep discharge into the Snohomish River along the length of the site from small openings in the bulkhead, upward from the base of pilings and directly from exposed sediment next to the bulkhead. The highest concentrations of arsenic and PAHs were found in association with those seeps. Based on the potential for sediment disturbance during bulkhead repairs (as well as alternatives to repair), additional information should be provided to analyze the alternatives requiring retention of the bulkheads. Information should also be provided on present condition of the bulkheads in these areas, quality of sediments waterward of the bulkhead sections, what type of repairs would be anticipated and verified location of the ordinary high water mark by Ecology. 5

As the bulkhead in the more northern portion of the site has deteriorated to the extent that a new ordinary high water mark has established itself landward of the bulkhead, a new replacement bulkhead, were it to be permitted, would have to be located at or above the actual ordinary high water mark (per WAC 173-27-040(2)).

The SEIS should clarify that a vertical bulkhead does not provide cover and refuge for juvenile

salmonids as stated on page III-54. Bulkheads serve to simplify the habitat and when placed waterward of the ordinary high water mark, reduce the necessary shallow waters critical to out-migrating juvenile salmonids.

6. **Public access.** The public access if proposed to be located within the 50-foot buffer. Since this would negate many of the buffer functions, the trail should be placed outside the buffer.

Limiting the public access on the site to employees does not fulfill the spirit of the Shoreline Management Act whose goal is to provide an opportunity for substantial numbers of people to enjoy the shorelines of the state. The Bridge Crossing Agreement between Weyerhaeuser and Burlington Northern has not been attached as an Appendix to the SEIS. Therefore, it is difficult to determine what specific restrictions apply under that agreement. Ecology recommends that the Port take a closer look at the potential problems that resulted in the public access restrictions with an eye to finding alternative means for expanding public access opportunities. 6

Thank you for the opportunity to provide comments. If you have any questions, please contact me at 425/649-4253.

Sincerely,

Joan M Velikanje

Joan M. Velikanje
Shoreline Specialist
Shorelands and Environmental Assistance Program

JMV:jv

cc: Pamela Erstad, WDFW

Letter 8: State of Washington Department of Ecology
Dated March 1, 1999

Comment 1. The Everett SMP clearly states that "activities locating within 200 feet of the ordinary high water mark shall be water-dependent." There are no provisions for over-looking this requirement if a vegetated buffer is proposed. A shoreline master program amendment would be required.

Response 1. *The City of Everett agreed with the Port of Everett to designate the northern portion of the Riverside site, where barge access is feasible, as "Ports and Water-Related Industry, and the southern portion of the site, where barge access is not feasible, as "Commercial." Within the "Ports and Water-Related Industry" use designation, the Everett Shoreline Master Program requires that development within 200 feet of ordinary high water shall be water-dependent. There is no such requirement for the "Commercial" use area. Section 3.7.2.1 of the Draft SEIS discusses these requirements in more detail.*

It is acknowledged that a Shoreline Master Program amendment would be required for the entire site to be designated as non-water dependent. Until such time as such an amendment has been approved by the City and the Department of Ecology, water-dependent uses will be required along the northern portion of the site within 200 feet of ordinary high water.

Comment 2. The SEIS provides no analysis of the impacts of dredging that would be required if the site is redeveloped with water-dependent uses. As the need for dredging is a key difference between the Proposed Project, Alternative 1, and Alternative 2, this omission is not acceptable. Also, establishment of a buffer along the northern half of the parcel (Alternative 1) would likely involve some work below Ordinary High Water (OHW). Without adequate information concerning the differences in environmental impacts between water-dependent and non-water-dependent uses, there is no basis for analyzing impacts between alternatives.

Response 2. *Your comments are noted and included in the record. Please see the Errata sheet for Section 3.4.3.2 for a description of potential impacts from a water-dependent user. Given there are no such users anticipated for this site, the analysis is based on many assumptions about the type of user and level of impacts associated with that use. The Draft SEIS acknowledges that at such time as a water-dependent user(s) is identified to locate on-site, further environmental review will be required to address the issues related to work below OHW. This environmental review will include sampling of in-river sediments. Corps of Engineers sediment sampling in the navigation channel opposite the site over the last ten years has not detected contaminants at levels that would preclude open water disposal or beneficial use of the sediments.*

Comment 3. To say that no development is to take place within the 200-foot shoreline environment is not an accurate statement. To avoid piecemealing, improvements to all portions of the shoreline should be considered in the present analysis.

Response 3. *See the response to Comment 2 above. The Draft SEIS states that no work will occur below OHW until further environmental review has been undertaken. It is agreed that work will occur within 200 feet of the shoreline under this proposal, particularly along the southern portion of the site. The northern portion of the site may be developed if water-dependent users are identified. However, no work below the OHW will occur, for example to build a dock or barge loading facility, without further environmental review. WAC 197-11-060(5) Phased Review allows environmental review to be phased, in order to "...focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready."*

Comment 4. The 50-foot buffer for the southern portion of the site is not supported by best available science. A minimum 250-foot buffer is indicated.

Response 4. *Your comment is noted and included in the record. Please refer to Response 2, State of Washington Department of Fish and Wildlife letter.*

Comment 5. There is no information regarding the environmental impacts of bulkhead repairs.

Response 5. *Your comments regarding the impacts of bulkhead repair at this site are noted and included in the record. The DSEIS notes that the existing bulkhead along the northern portion of the site is still in good condition. See DSEIS Section 3.4.3.1. The Port has no specific proposal for any repairs at this time. At such time as any repairs are proposed, additional environmental review will be required. It should also be noted that while a shoreline with a bulkhead does not offer shallow water habitat in which juvenile salmonids can escape fish or diving bird predators (mergansers, grebes), deep water along the face of a bulkhead does offer juvenile fish ready access (by sounding) to deepwater refuge from avian predators (herons, terns, kingfishers).*

Comment 6. The proposed trail would be located within the 50-foot buffer, which would negate many of the buffer functions. The trail should be placed outside the buffer. Also, limiting public access on the site to employees does not fulfill the spirit of the Shoreline Management Act.

Response 6. *You comments regarding the location of the trail and restrictions on public access are noted and included in the record.*

The location of a trail along the shoreline may be subject to conflicting regulations and policies due to changes in policies over the past 10-15 years regarding shorelines and habitat. In 1987, the City of Everett adopted "A Pedestrian and Bicycle Access Plan for Everett's Snohomish Riverfront." On page 25 of that plan are the design details for the riverfront public access trail. "All non-water-dependent development shall provide a 25-foot wide minimum public access easement measured from the ordinary high water mark." The City environmentally sensitive ordinance requires a buffer along a tidal estuarine wetland. The regulations do not specifically prohibit paths within the buffer. Finally, the Everett Shoreline Master Program requires public access as described in Section 3.7.2.1.

By contrast, the comment letter references the document "Management Recommendations for Washington's Priority Habitats: Riparian" prepared by Washington Department of Fish and Wildlife. This document provides recommendations for "Riparian Habitat Areas" such as along the shoreline at the Riverside Business Park. This policy document recommends that "to meet the goal of maintaining or enhancing the structural and functional integrity of riparian habitat....riparian habitat characteristics required by fish and wildlife include...minimization of human-induced disturbances." (A summary of these management recommendations may be found at www.wa.gov/wdfw/hab/ripxsum.htm.)

The City of Everett will determine the location of the trail as part of the Shoreline Substantial Development Permit. At such time as the trail details are determined, these various regulatory and policy issues should be reviewed. Please refer to the City of Everett Planning and Community Development letter and responses regarding further issues related to public access.

State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Region 4 Office: 16018 Mill Creek Boulevard - Mill Creek, Washington 98012 - (425) 775-1311

March 8, 1999

COMMENT LETTER NO. 9

Port of Everett
ATTENTION: Robert McChesney
PO Box, 538
Everett, Washington 98206

Dear Mr. McChesney:

SUBJECT: Port of Everett: Amendment to Comprehensive Scheme of Harbor Improvements for Riverside Business Park; , Snohomish County

I have reviewed the Riverside Business Park proposed project and alternatives and have the following comments regarding each proposal:

Proposed Project:

- The northern half of the site would be reserved for marine-related, water-dependent uses. This would include a barge-loading facility that would require dredging due to the shallow substrate in this vicinity. Before any decisions are made on proposed water-dependent uses at the site, the effects of dredging on fish life will need to be analyzed.

  Shallow shoreline areas are essential for salmonid feeding and rearing. Epibenthic fauna, which occurs on beaches from -10 to +10 MLLW, is a critical food component for salmon and other fish and shellfish species. One such species is the Chinook salmon, which is expected to be listed as a threatened species under the Endangered Species Act (ESA) on March 16. Deepening the river will not only result in a loss of food supply, but may inhibit juvenile salmonids from staying close to shore because of noise activity from disturbances associated with barge traffic.[1] Studies have also shown that juvenile salmonids avoid going under dark structures, such as large wooden piers or ships, in part, because of the contrasts in the surrounding ambient lighting. The Snohomish River Chinook are listed as a "depressed" stock in the *"Washington State Salmon and Steelhead Stock Inventory Report"* and any potential impacts to feeding and rearing for this species will most likely need to go through scrupulous review not only by WDFW, but by the National Marine Fisheries Service, as well. 1

According to WAC 220-110-320: **"Dredging projects shall incorporate mitigation measures as necessary to achieve no-net-loss of productive capacity of fish and shellfish habitat"**.

Currently, the Washington Department of Fish and Wildlife (WDFW) mitigation requirement for beach loss must exceed a one-to-one ratio. In other words, it would be necessary to have a net gain of habitat if the shoreline is dredged in shallow areas utilized by salmon and other marine fish and shellfish. Although other marine-related water dependent uses have not been identified at this time, mitigation would also be necessary for all over-the-water structures that would result in a loss of habitat.

- The 50-foot vegetative buffer along the southern half of the site is inadequate for supporting snags and woody debris, which are a vital component of riparian habitat zones. According to the *"Management Recommendations for Washington's Priority Habitats"* **a minimum of 250 feet is required to provide an adequate buffer for Type 1 and Type 2 streams**. Riparian habitat areas are recommended, in part, to control stream temperature, provide large woody debris and other organic debris to the river system, and to provide filtration for sediments and pollutants. More importantly, the new roads proposed at this site are anticipated to generate 5,500 trips per day. Noise and pollution from heavy traffic could potentially alter the nearshore migration route of juvenile salmon, causing them to swim in deeper waters containing more predators. Creating adequate buffers will be a critical element to any of the options being reviewed due to the high level of activities proposed on the site. 2

- The existing bulkhead along the site is failing in places. If new beach areas have been established behind the bulkhead, the ordinary high water line will be at the highest reach of beach. Also, if a bulkhead is not a functioning bulkhead, it will be considered new construction and must abide by policies established in WAC 220-110-280 for the location of new bulkheads. 3

Alternative 1 - No Water-Dependent Uses:

- Shoreline impacts may be lessened (depending on what type of commercial industry is proposed) from the implementation of Alternative 1 because no water-dependent industry would be located along the shoreline. This does not mean that there would be no adverse impact to salmonids. Of special concern is the fifty foot proposed buffer. As mentioned above, this is too narrow and does not meet WDFW standards. 4

Another area of concern is that no effort will be made to remove the existing pilings and bulkheads in the water. During a time when we have endangered-species listings looming over us, I believe it is important for publicly owned properties managed by governmental agencies to implement best public stewardship practices. Studies have shown that armored structures along shorelines are detrimental to fish life, in part, by eliminating overhanging shoreline vegetation and large, woody debris and subjecting juvenile fish to greater predation. Although it may not be feasible to totally remove pilings (this would depend on the condition of the piling and the toxicity of the substrate beneath it), efforts should be made to restore the nearshore environment to a condition that is conducive to juvenile fish feeding and rearing.

Alternative 2 - Single, Water-Dependent User and Business Park:

- Of all the proposed project options, Alternative 2 could have the most serious effects on fish life. Not only would the presence of water-dependent industry have negative impacts (refer to Proposed Project comments), but a concrete-products plant would be located on the site as well. Cement is extremely toxic to fish. Any accident, even a minor one, that caused cement to enter the river could have major implications to fish life, especially to juveniles, which are much more susceptible to pollutants. Although a storm drainage system would be in place, dust particles from the plant could enter the river system via air currents and could have serious impacts. Other negative aspects of this alternative is that the sand and gravel would be brought in via barge, which would require dredging. Off-loading gravel could also pose a problem, if the gravel is not completely enclosed during the transport from the barge to the plant, due to spillage in the water and on the shoreline. 5

  Traffic and its associated noise and pollution may be detrimental to juvenile salmonid outmigrants. An estimated 270 trucks would be entering and exiting the site on a typical day and could affect nearshore fish-migration patterns. Also, there would be no buffer zone at the site where the ready-mix plant and associated concrete-products plant would be located, which could increase the chances of pollutants entering the river.

- Finally, the 50-foot buffer is inadequate and should be expanded to a minimum of 250 feet.

Alternative 3 - No Action:

- Currently, the shoreline along the proposed Riverside Business Park does not provide good habitat for salmonids and other fish inhabiting the nearshore environment. 6

Armoring structures do not provide adequate shading and protection like naturally vegetated areas that have overhanging trees and large woody debris. Also, the log-storage operation on site does not provide good habitat. Studies have shown that juvenile salmonids will not swim underneath structures that are dark or have low lighting. Most likely, juvenile fish swim around the structure and cannot use the nearshore habitat where the logs are contained.

Currently, there are several areas around the bulkhead where contaminants show elevated levels of PAHs and arsenic due to seeps and storm-drain outfalls. Containment of the leaks should be addressed **prior** to any repair or new construction on the bulkhead or pilings.

Thank you for the opportunity to provide this information. If you have any questions, please contact me at (425) 379-2306.

Sincerely,

Pamela Erstad

Pamela Erstad
Area Habitat Biologist

PE:pe:Rs.wpd

cc: Ted Muller, WDFW
Tony Oppermann, WDFW
Joan M. Velikanje, DOE

Letter 9: State of Washington Department of Fish and Wildlife
Dated March 8, 1999

Comment 1. Before any decisions are made on proposed water-dependent uses at the site, the effects of dredging on fish life will need to be analyzed. Currently, the Department of Fish and Wildlife mitigation requirement for beach loss must exceed a one-to-one ratio. Mitigation would also be required for all over-water structures that would result in a loss of habitat.

Response 1. *Your comments are acknowledged and included in the record. Please see the Errata sheet for Section 3.4.3.2 for a description of dredging. At such time as any dredging or over-water structures are proposed, further environmental review will be undertaken and mitigation proposed. The Port proposes to use the models and policies of the Snohomish Wetland Integration Plan (SEWIP) to calculate mitigation requirements for any work required below ordinary high water.*

Comment 2. The 50-foot vegetative buffer along the southern half of the site is inadequate for supporting snags and woody debris, which are a vital component of riparian habitat zones. "Management Recommendations for Washington's Priority Habitats" state that a minimum of 250 feet is required to provide an adequate buffer for Type 1 and Type 2 streams. Noise and pollution from the estimated 5,500 vehicle trips per day could potentially alter the nearshore migration route of juvenile salmon. Creating adequate buffers will be a critical element to any of the options being reviewed due to the high level of activities proposed on the site.

Response 2. *Your comments regarding buffers are noted and included in the record. For the last 60 years or more, there has been no buffer along the shoreline of this industrialized site. The proposed buffer was added to the project to enhance the shoreline habitat environment. The design and width of the proposed buffer was developed after consultation with state and local habitat agency representatives and the project's marine and wetland biologists.*

The Port recognizes the recommendations for riparian buffers contained in the cited reference. These recommendations are based on a substantial body of literature that has researched the influence of buffer width on a wide variety of ecological functions that are relevant to forested portions of middle and upper watersheds of systems such as the Snohomish. These functions are generally less relevant in an estuarine environment. The natural shorelines of a tidal estuary typically grade from mudflat or mudbank to a salt or brackish marsh fringe that extends to OHW. In an estuary, this marsh fringe contributes many of the same functions typically provided by a wooded riparian buffer higher in the watershed (organic matter production, water quality amelioration, prey production, shelter for fish during high tide).

Above OHW, estuarine shorelines are typically bordered by a band of scrub-shrub wetland and/or deciduous trees (e.g., cottonwoods, willows, alders). A managed 50-foot buffer of such vegetation along the site, as proposed and required by the City of Everett, will provide a buffer with all the same functions as a wider buffer at an industrial site. Because of the size of the mainstem Snohomish River as it passes the Riverside site, no buffer width would significantly

affect water temperature. The 50-foot buffer of largely deciduous trees will provide substantial leaf litter fall to the river although organic carbon is not likely limiting secondary production at this point in the watershed (downstream of extensive agricultural areas). The great majority of large woody debris in a natural estuary is derived from upstream areas. Trees falling into the salt marsh buffer of an estuary add little to the cover already provided by the salt marsh and are unlikely to be carried downstream because of the low current regime.

Comment 3. The existing bulkhead is failing in places and if new beach areas have been established behind the bulkhead, the OHW line will be at the highest reach of the beach. Also, if the bulkhead is not a functioning bulkhead, it will be considered new construction.

Response 3. *Your comments are acknowledged and included in the record.*

Comment 4. Shoreline impacts may be lessened with Alternative 1, however the 50-foot buffer shown as part of Alternative 1 is too narrow and does not meet WDFW standards. Also, no effort is being made to remove the existing pilings and bulkheads. Publicly owned properties should implement best public stewardship practices. Efforts should be made to restore the nearshore environment to a condition that is conducive to juvenile fish feeding and rearing.

Response 4. *Your comments are noted and included in the record. The existing pilings along the shoreline of the site are uniformly old and, if they were once treated with toxic preservatives, have long since lost the great majority of those chemicals to weathering and erosion. At present, these pilings in fact provide a form of large woody debris that is known to be important in providing habitat diversity to downstream migrating juvenile salmonids. In addition, these pilings intercept and accumulate other natural large woody debris drifting downstream which, in many cases has developed into an important component of the shoreline habitat. In a large part of the central portion of the site, drifting large woody debris has accumulated behind pilings under what was once an over-water wharf and has created a densely packed aggregation of wood with ample cover and feeding opportunities for fish. The Port of Everett is committed to ultimately restructuring the shoreline of the site to maximize the shoreline habitat for juvenile salmonids and other resources. Please refer to Response 2, above, regarding buffer widths.*

Comment 5. Of all the alternatives, Alternative 2 could have the most serious impact on fish life. Also, the 50-foot buffer is inadequate and should be expanded to 250 feet.

Response 5. *Your comments regarding Alternative 2 are noted and included in the record.*

Comment 6. Currently, the shoreline along this site does not provide good habitat for salmonids and other fish inhabiting the nearshore environment. The present armoring structures, log storage operations, and seeps with elevated levels of contaminants affects the quality of habitat for the No Action Alternative.

Response 6. *Your comments regarding the No Action alternative are noted and included in the record.*

PUGET SOUND ENERGY

COMMENT LETTER NO. 10

February 28, 1999

Robert McChesney
Port of Everett
P.O. Box 538
Everett, WA 98206

RE: **Riverside Business Park**

Dear Mr. McChesney,

Thank you for the opportunity to comment on the Draft SEIS for the Port of Everett's Riverside Business Park. The redevelopment of the Weyerhaeuser East Site will be a benefit to Everett and the greater community and we support your efforts to revitalize the area.

Puget Sound Energy operates an existing eight inch high pressure gas main situated in an easement to the northwest of your property. A sketch depicting the approximate location of Puget Sound Energy's facilities is enclosed for your reference In addition, a reinforcement project is currently being developed, consisting of a new high pressure line that is proposed to cross the Snohomish River in close proximity to Riverside Business Park. Construction is tentatively planned for the year 2000, and we will need to coordinate these activities. 1

To assist in this coordination effort, please forward your preliminary plans as soon as they are available. Potential relocation and any new facilities required to serve your development may trigger potential permits, which could have long lead times. Inclusion of utility relocates in your environmental review and Shoreline Permit could help eliminate costly duplication of effort and potential delays. Please send plans and future correspondence to:

Mariamne Kingsbury
1122 75th ST SW - M/S EVT 02
Everett, WA 98203

Should you have any questions please contact me at (425) 356 - 7511. I look forward to discussing your project and your energy needs further.

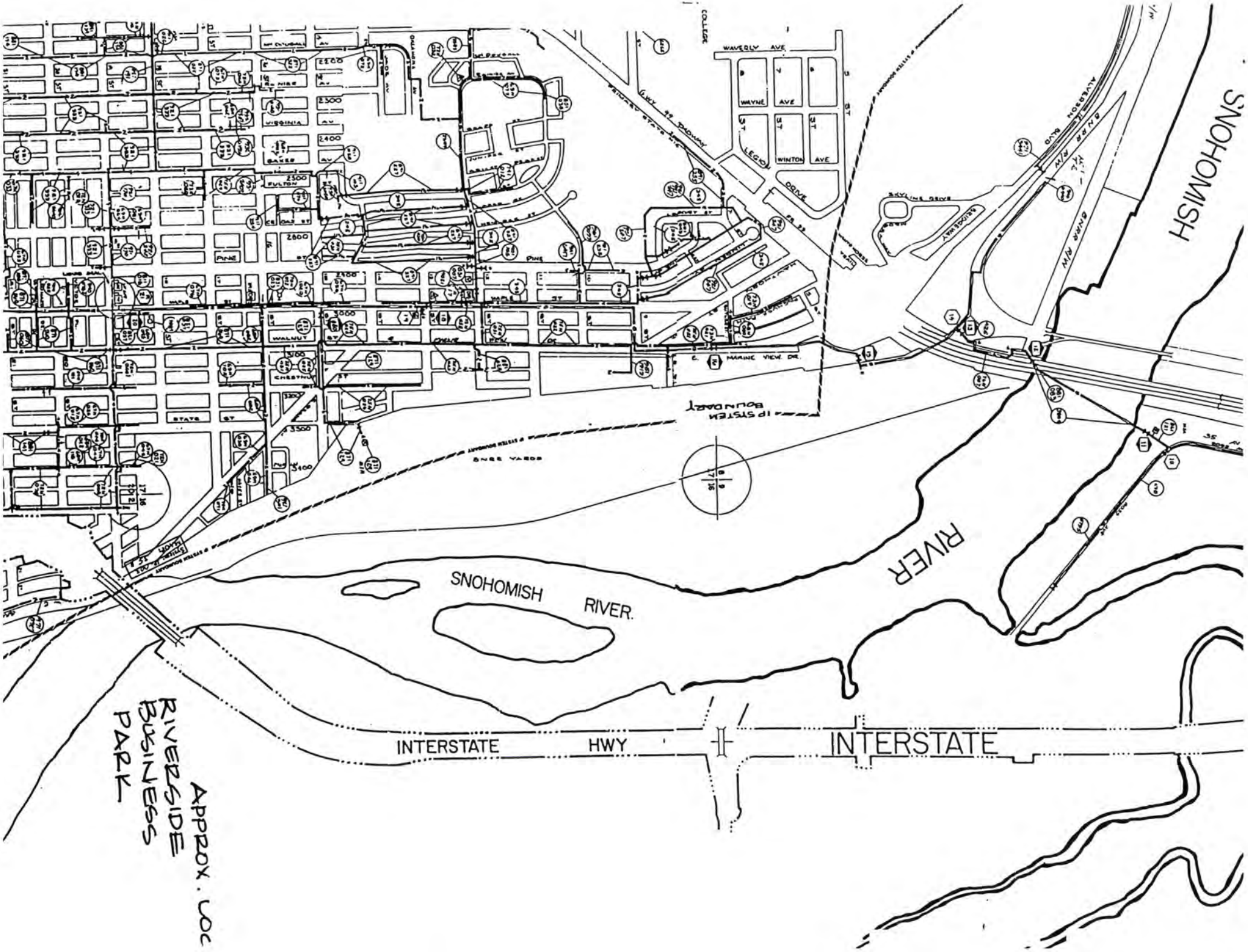
Sincerely,

Mariamne Kingsbury

Mariamne Kingsbury
Puget Sound Energy

cc: Karl Kirn
Colleen Gamman
Tom Ling

N/POEverett/commentltr.doc


SNOHOMISH
RIVER
SNOHOMISH
RIVER.
INTERSTATE
HWY
INTERSTATE
APPROX. LOC
RIVERSIDE
BUSINESS
PARK
WAVERLY AVE
WAYNE AVE
WINTON AVE
LEGO
DRIVE
COLLEGE
PINE
WALNUT
CHESTNUT
STATE ST
VIRGINIA
BAKER
FULTON
MAIN
MARINE VIEW DR.
SKYLINE DRIVE
BNSF R/W
ATLERTON BLVD
ONE YARDS
IP STEM BOUNDARY

Letter 10: Puget Sound Energy
Dated February 28, 1999

Comment 1. Puget Sound Energy operates an existing eight inch high pressure gas main situated in an easement to the northwest of this property. A reinforcement project is being developed which consists of a new high pressure line that will cross the Snohomish River in close proximity to Riverside Business Park. Construction is tentatively planned for the year 2000, and we will need to coordinate these activities.

Response 1. *The Port of Everett will coordinate with Puget Sound Energy as required.*

Port *of* Everett

April 6, 1999

RECEIVED
APR 06 1999
DEPT. OF ECOLOGY

To: Recipients of the Draft and Final SEIS

Re: Riverside Business Park

Attached is a copy of the Final Supplemental Environmental Impact Statement (FSEIS) for Riverside Business Park. This Final Draft SEIS addresses a proposed amendment to the *"Port of Everett Comprehensive Scheme for Harbor Improvements"* to approve a master plan for, and subsequently construct, a 78 acre business park adjacent to the Snohomish River in Everett, Washington. The proposed project would encompass approximately 1.35 million square feet of industrial, manufacturing and warehouse space.

Together, the Draft and Final SEIS address impacts to the natural environment (earth, air quality, water/wetlands, plants and animals, marine environment) and the built environment (noise, land use, consistency with plans and policies, light and glare/aesthetics, transportation, public services and utilities) resulting from construction of this project. This SEIS also addresses the impacts of two alternative scenarios of industrial use and a No-Build alternative. The Final SEIS includes all the review comments received during the comment period for the Draft SEIS, and responses to those comments.

Copies of both the Draft and Final SEIS are available for review at the Port of Everett office (2911 Bond St., Suite 202, Everett WA 98206) and the Main Branch and South Branch of the City of Everett Public Library. The Final SEIS may also be purchased from the Port office.

For further information regarding Riverside Business Park, please contact:

Mr. Robert McChesney
Port of Everett
P.O. Box 538
Everett WA 98206
(425) 259-3164

Thank you for participating in the review of this project.

Sincerely,

Port of Everett

John Mohr
Executive Director

2911 Bond Street, Suite 202 • P.O. Box 538 • Everett, WA 98206 • Phone (425) 259-3164 • Fax (425) 252-7366 • E-mail: gen@portofeverett.com