

**SEPA ADDENDUM
FOR THE SNOQUALMIE MILL PLANING AREA
POST ANNEXATION IMPLEMENTATION PLAN**

May 10, 2016

1. FACT SHEET

Project Title

Mill Planning Area Post Annexation Implementation Plan (AIP)

Applicant

Snoqualmie Mill Ventures, LLC

Proposed Action

The applicant is requesting the approval of a Post Annexation Implementation Plan (AIP). The AIP does not propose, and the City's action would not approve, any development or redevelopment of any portion of the annexation area. The AIP is a required step in planning the eventual use of the site and consists primarily in collecting information about infrastructure, utilities and environmental constraints. It is not a plan or proposal for development or redevelopment of the site.

Location

The AIP addresses property located within the City of Snoqualmie, between the Snoqualmie River and along 396th Avenue SE within Sections 29, 30, and 32 of Township 24, Range 8 East, W.M. See Figure 1.

SEPA Lead Agency/Responsible Official

City of Snoqualmie Community Development Department
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Contact Person

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Addendum Principal Authors

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Expected Date of Action

Public hearings and deliberations on the AIP are expected to occur in July and August, 2016. Please check the City's website for possible updates to the schedule.

Adoption of Existing Environmental Documents

SEPA Checklist and Determination of Non-significance (DNS), published August 3, 2011, for the Snoqualmie Mill Planning Area Pre-Annexation Zoning and Pre-Annexation Agreement. Pursuant to WAC 197-11-630, a Notice of Adoption will be provided to any agencies with jurisdiction that did not receive the DNS and will be available in the City offices and provided upon request.

Addendum Distribution and Availability

The addendum may be reviewed at the Snoqualmie Community Development Department during normal business hours, and on the City's website.

Comment Period

There is no comment period for this addendum, pursuant to WAC 197-11-625.

2. PROPOSED ACTION

Snoqualmie Mill Ventures LLC has submitted a Post Annexation Implementation Plan (AIP) to the City, as required by the City's Comprehensive Plan and a Pre-Annexation Agreement. The AIP application (AIP 16-01) was deemed complete on April 26, 2016 and a Notice of Application was duly published.

Background/Planning Context

The Snoqualmie Mill Planning Area, which is comprised of approximately 573 acres of land, was annexed to the City of Snoqualmie in 2012. Most of the annexed area consists of the former Weyerhaeuser Mill, which manufactured lumber products between 1920 and 2003. Prior to annexation, and to help create a framework for subsequent planning of the area, the City, the applicant and other affected property owners entered into a Pre-Annexation Agreement. Among other things, this agreement identified City zoning and shoreline designations for the property which would become effective upon annexation. Approximately 300 acres, which is owned by Snoqualmie Mill Ventures, was zoned for Planned Commercial/Industrial (PC/I) use and open space. A substantial portion of the planning area, owned by Weyerhaeuser Real Estate Company, was designated as open space.

Pre-Annexation Agreement. A major purpose of the AIP is to demonstrate compliance with applicable annexation policies in the Snoqualmie Comprehensive Plan and requirements of the Pre-Annexation Agreement. *The Pre-Annexation Agreement*, adopted in October 2011, identified zoning and shoreline designations that would apply to the planning area upon annexation, as well as limitations on existing uses and requirements for future site planning, including a sensitive areas study, protection or adaptive reuse of an historic structure, dedication of property to the City Riverwalk Trail and the Snoqualmie Valley Trail. The Agreement states that the City will not approve any new development or redevelopment, and will defer applying the Comprehensive Plan's annexation policies, until approval of an AIP, a plan for development within the PC/I zone, and completion of environmental review.

Consistency with requirements of the Pre-Annexation Agreement is addressed in the AIP.

Annexation Policies. The Comprehensive Plan's annexation policies (7.8.1 through 7.8.9) identify the required steps and contents for an AIP. Major requirements include the following:

- Portray proposed land uses, the primary road network and primary utility systems;
- Review of City sewer, water and drainage utility plans;
- Allow AIPs to be amended during the environmental review process and during review of specific development plans;
- Require development approvals to conform substantially to AIPs;
- Buffer abutting unincorporated rural or resource lands;
- Permit deferring AIP preparation until after annexation when there is no current development proposal and AIP topics cannot be meaningfully evaluated;

- Address requirements for the Mill Planning Area identified in the Comprehensive Plan (Table 1.3): flood hazards; preservation of flood storage and conveyance in the floodway; protect/preserve unique natural features and viewsheds; assess contamination and necessary cleanup; conduct comprehensive transportation analysis; provide trail right-of-way to connect local and regional trails; protect the City's north well field from contamination.

Consistency with the Comprehensive Plan's annexation policies is addressed in the AIP.

Post Annexation Implementation Plan. The AIP is a subsequent step in a multi-step process for master planning the Mill Planning Area property. That process began with the initial rezoning of the property and execution of a Pre-Annexation Agreement, followed by annexation to the City in 2012. The City also updated its Comprehensive Plan to provide policy guidance for subsequent planning and submittal of a development application. The post-annexation planning process also required site-specific investigations to identify and characterize critical areas and other environmental conditions. These initial investigations began in 2012 and are ongoing. However, the site has not been master planned yet and no further information about a potential mix or amount of land uses is available.

The AIP submitted to the City addresses the topics and actions required by the Pre-Annexation Agreement and the Comprehensive Plan's Annexation policies. It includes relevant environmental information to help characterize existing site conditions and environmental constraints; site characterization studies completed to date are identified below. Pursuant to established City procedures, the Planning Commission and City Council will review the AIP for conformance with applicable requirements.

As noted previously, the AIP does not propose, and approval of the AIP would not authorize, any development or redevelopment of the Mill Planning Area. The Comprehensive Plan and Pre-Annexation Agreement specifically state that no development or redevelopment may occur until after approval of an AIP, review of a PCI plan for the site, and environmental review pursuant to SEPA. In essence, the AIP provides an opportunity to check on a number of planning issues, including utilities, a future on-site road network, critical areas constraints, and potential compliance with Comprehensive Plan policies. These initial, preliminary studies are precursor to master planning the site and preparation of a development application. Following approval of the AIP, the situation of the property will be no different than it was at the time the Pre-Annexation Agreement was signed and City zoning was applied.

SEPA Addendum

As authorized in the State Environmental Policy Act (SEPA, RCW 43.21C.034), proposals may use existing environmental documents to comply with SEPA. Adoption of an existing document is one way that such documents may be used for a current proposal (WAC 197-11-630). The SEPA Rules (WAC 197-11-625) also authorize use of an addendum to add information and analysis about a proposal to the analysis contained in an existing environmental document. The impacts of the two proposals should be similar in type and magnitude. The prior and present actions do

not need to be exactly the same, but should be similar enough to provide a basis for comparing impacts. The addendum cannot significantly change the analysis of impacts contained in an existing environmental document or identify new significant adverse impacts that were not previously identified.

The City prepared a SEPA checklist and issued a determination of non-significance (DNS) for the Pre-Annexation Agreement and zoning in 2011. The DNS concluded that the pre-annexation agreement and City zoning that would apply to the property upon annexation would maintain the status quo, was more restrictive than uses permitted under the prior King County zoning, and would not authorize any new development or redevelopment of the property. Because there was no development plan or environmental information for the property, the DNS concluded that any assumed development program would be speculative. Meaningful and detailed environmental review would occur in the future, when the site had been master planned within the framework of City policies and development regulations and in view of site-specific environmental constraints. By the terms of the Pre-Annexation Agreement and Comprehensive Plan policies, no development or development can occur until an AIP has been approved, a site-specific development plan has been submitted, and environmental review has been completed.

Approval of the AIP would not change the current posture of the Mill Planning Area property; conditions today are virtually the same as they were at the time the Pre-Annexation Agreement was executed and the DNS was issued in 2011. As was described previously, the AIP does not propose and would not approve any development or redevelopment of the site. All policies, development regulations, review procedures, and environmental requirements will apply to a future development application. The previous analysis of environmental impacts reflected in the 2011 SEPA checklist and DNS also still apply. Since the “proposals” are so similar, if not identical, there would be no different impacts. This addendum, therefore, provides information about the status of various site studies and the preliminary planning that has occurred. No new information about potential impacts is available, however.

As contemplated by the City’s annexation policies (e.g., 7.8.3, 7.8.8 and 7.8.9), detailed environmental review will occur when the applicant develops and submits a Planned Commercial/Industrial plan (PC/I) and a specific development proposal for the site. The applicant has committed to prepare an environmental impact statement (EIS) at that time.

3. ADDITIONAL INFORMATION

A number of environmental studies have been prepared and submitted to the City in conjunction with the AIP and are part of the Sensitive Areas Study. These studies are required by provisions of the Pre-Annexation Agreement and/or annexation policies of the Comprehensive Plan. In general, they are intended to help characterize the site, identify environmental constraints, and provide a baseline for subsequent site planning. The studies do not identify potential impacts, however, since there is currently no development plan or

proposal for the property. The studies, which are identified and discussed in the AIP, include the following:

- Geotechnical Report, Associated Earth Sciences, March 5, 2015
- Fisheries Technical Information Report, Cedarock Consultants, October 16, 2012
- Wetland and Stream Report, Raedeke Associates, December 15, 2015
- Cultural Resource Report, Cultural Resources Consultants, October 26, 2015
- Environmental Site Assessment – Current Conditions Report, Associated Earth Sciences, March 5, 2015

The SEPA checklist form (WAC 197-11-960, Part D) contains a set of broad questions that are applicable to programmatic/non-project proposals. Responses to Part D follow, and acknowledge the general types of impacts that typically occur in conjunction with urban development. No specific development plans are available for the site at this time, and it would be speculative to attempt to identify or quantify specific impacts based on a hypothetical mix and intensity of land uses. Detailed environmental review will occur when a development plan is submitted.

SEPA Checklist Form (WAC 197-11-960)

D. Supplemental sheet for Non-project actions

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharges to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

1. Discharges to Water

No development is currently proposed and there would be no discharges to water associated with approval of the AIP. Future development of the Mill Planning Area will be governed by an approved Drainage Control Plan. As such, the developed site will replicate existing conditions by infiltrating (where feasible) all stormwater runoff generated on-site, treat surface water runoff for water quality prior to detaining, discharging ultimately to the Snoqualmie River.

Proposed measures to avoid or reduce such increases are:

None are needed at this time. For future development, Low Impact Development (LID) Best Management Practices (BMPs) would be used where feasible to reduce the impacts of the developed conditions runoff, and to reduce the size of conventional stormwater facilities.

2. Emissions to Air

No development is currently proposed and no emissions to air would be associated with approval of the AIP. The 2011 DNS anticipated that changes in land use and transportation would have an impact on air quality. It is anticipated that development and redevelopment of the Mill Planning Area would increase short-term emissions to air from construction equipment and vehicles during site development; and in the long-term from increased vehicles for employees, clients/patrons/customers, delivery trucks, and potentially freight trucks associated with permitted land uses. Project specific details for future proposed development activities would be provided in subsequent Environmental Impact Statement(s).

Proposed measures to avoid or reduce such increases are:

None are needed at this time. For future development, emissions from construction equipment and trucks would be reduced by using well-maintained equipment. Avoiding prolonged periods of vehicle idling and engine-powered equipment would also reduce emissions. Dust abatement/dust control measures may be implemented during construction if necessary per an approved TESC Plan. By implementing BMPs and following prescribed mitigation measures, on-site construction activities are not likely to substantially affect air quality in the project vicinity.

3. Toxic or Hazardous Substances

The *Environmental Site Assessment – Current Conditions Report (March 5, 2015, Associated Earth Sciences, Inc.)* identified 6 areas of potential environmental concern, which will be addressed through future planning activities. No increase in hazardous substances would occur with approval of the AIP or future development.

Proposed measures to avoid or reduce such increases are:

None are needed at this time. In the future, remedial actions would be completed at the site prior to or concurrent with site development and would remove environmental health hazards. Exposure of construction workers during site development would be mitigated by implementation of appropriate health and safety plans, exclusion zones, use of trained workers, and good construction work practices.

4. Noise

The principle sources of noise on the Mill Planning Area site is associated with traffic on the surrounding roadways, the on-site Haul Road, and the DirtFish Rally School. The Calportland Quarry / Glacier Northwest gravel mining facility lies approximately ¼ mile north of the Mill Planning Area.

No development is currently proposed and no noise increases would be associated with approval of the AIP. On-site noise from future development is not anticipated to exceed acceptable levels of noise typically generated from an employment campus development. Construction noise would be emitted during construction from heavy equipment. During operations, on-site sources of noise would mainly be attributable to vehicles associated with the commercial, residential, and industrial uses.

Proposed measures to avoid or reduce such increases are:

None are needed at tis time. In the future, construction vehicles would include exhaust mufflers to reduce impacts associated with equipment noise. Construction activities would adhere to limited hours of construction / operation as directed by the City of Snoqualmie.

2. How would the proposal be likely to affect plants, animals, fish or marine life?

1. Plants

The Mill Planning Area site has been significantly disturbed by its past uses since development began in the early 1900's. Very little native, undisturbed areas exist on the site.

There are no known threatened or endangered plant species on the Mill Planning Area site.

No development is currently proposed and no impacts to plants would result from approval of the AIP. Future development would require clearing of existing vegetation in the central area of the site, outside of sensitive areas and associated buffers.

2. Animals

The historic use of the Mill Planning Area over the past 100 years has resulted in man-made fill and impervious surfaces covering a majority of the developable area of the site. No development is currently proposed and there would be no impacts to animals associated with approval of the AIP. Redevelopment of the Mill Planning Area would result in approximately 2/3 of the overall site area set aside in sensitive area tracts, open space tracts, landscape tracts, or for active and passive recreational uses.

3. Fish

The *Fisheries Technical Information Report* (Cedarock Consultants, Inc., October, 2012) identified six (6) watercourses on the Mill Site meeting the definition of a stream, and fifteen (15) other water courses that are considered man-made drainage ditches.

Cedarock concluded that Mill Pond / Borst Lake meets the criteria of a perennial lake and is classified as fish-bearing for salmonids and warm water species. One stream is considered fair to good for spawning habitat, incubation, summer and winter rearing.

Approval of the AIP would not result in any change to the physical conditions of the site. Mitigation plans would be developed to address any impacts associated with a future development plan.

Marine Life

There is no marine habitat located within or near the Mill Planning Area.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

1. Plants

None are needed at this time. Landscape plans would be submitted in conjunction with future development applications. Mitigation measures could include planting species

native to the Puget Sound region. Maintenance and contingency measures would be included to address removal and control of invasive species located within critical areas and their associated buffers. LID areas will include a majority of native species adapted to variable moisture conditions from drought to full stormwater inundation.

2. Animals

No development is currently proposed, no impacts would result from approval of the AIP, and no measures are needed at this time. Landscaping to replace or enhance vegetation and trees would provide habitat for wildlife in the immediate vicinity of the site, as well as migratory animals, such as birds.

Mitigation plans would be prepared in connection with future development to provide compensation for activities proposed within sensitive areas and/or their buffers, if applicable. Mitigation measures would include planting species native to the Puget Sound region, thereby enhancing wildlife habitat. The plan would likely include measures to remove and control invasive species.

3. Fish

No impacts to fish would occur from approval of the AIP and no measures are required. In connection with future development, natural fish-bearing streams and their buffers will likely be protected under local, state, and federal requirements which require avoidance of these features as the primary development option. Any future land disturbing activities on the site would occur pursuant to an approved plan that would include restoration and/or mitigation measures to improve the overall function of the natural environment, including improvements to fish habitat and riparian buffers.

4. Marine Life

There is no marine habitat located within or near the Mill Planning Area.

3. How would the proposal be likely to deplete energy or natural resources?

No development is currently proposed and no impacts to energy or natural resources would result from approval of the AIP. In connection with future development, energy resources, including electricity and natural gas, would be used for lighting, heating, air conditioning, and to operate appliances and machinery associated with future land uses.

Proposed measures to protect or conserve energy and natural resources are:

None are needed at this time. Future development of the Mill Planning Area could target LEED for Core and Shell Certification. Specific measures intended to conserve energy may include daylighting, operable windows, occupancy sensors, and high efficiency mechanical units in common areas. Additional measures may include high-efficiency lighting, windows, and doors; Energy Star appliances; central water heating; high-efficiency machine room-less elevators; and passive ventilation in garage(s). High efficiency plumbing fixtures and landscape irrigation systems may also be planned to help reduce water consumption and

sewer volume, which reduces on-site energy required for heating water and off-site energy required to deliver water to the site and process wastewater.

Future Site Development applications would promote alternative modes of transportation, such as transit, bicycles, and pedestrian connectivity, thereby reducing dependence on single-occupancy vehicles.

- 4. How would the proposal be likely to use or affect environmental sensitive areas or areas designated (or eligible under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

Parks, Wilderness, Wild and Scenic Rivers

The Pre-Annexation Agreement requires dedication of lands to provide connections to the regional Snoqualmie Valley Trail system and for the City's Riverwalk Trail.

Threatened or Endangered Species

No threatened or endangered species have been identified within SMV owned-parcels in the Mill Planning Area. The Mill Pond would be set aside and preserved as open space for recreation low-utility use and would not be developed for purposes other than public parks and trails.

Historic or Cultural Sites

The Mill Planning Area has a history of almost 100 years of heavy industrial uses associated with the prior lumber mill operations. Several of the historic buildings remain, as well as broken remnants of building foundations of the former plywood plant, oil building, planer mill, powerhouse, and sheds.

The Pre-Annexation Agreement requires coordination with the King County Culture and Historic Preservation Office to consider potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures.

No development is currently proposed and no impacts to historic or cultural resources would result from approval of the AIP. A Cultural Resources Assessment is included with the AIP. Future site development and environmental review will include site investigations as determined by the Department of Archaeology and Historic Preservation.

Wetlands

No development is currently proposed and no impacts to wetlands would occur from approval of the AIP. Future development could result in impacts to on-site wetlands and their associated buffers. Mitigation Plans would be prepared to provide compensation for activities proposed within sensitive areas and/or their buffers. Mitigation measures may include restoration and enhancement of existing wetlands, or creation of wetlands on other areas of the site.

Floodplain Development and Compensating Storage

No development is currently proposed and no impacts to the floodplain would be associated with approval of the AIP. Future development of the Mill Planning Area will be required to comply with and be consistent with Flood Plain regulations of the City of Snoqualmie and FEMA. Building in the floodplain will include provisions of either (a) Flood Proofing or (b) fill and compensatory storage.

Future development of the Mill Planning Area is anticipated to include removing remains of past berming along Mill Pond Road. This creates a potential for a large volume of compensatory storage which would compensate for a development approach of fill prior to building construction in lieu of development of floodproofed buildings.

Farmlands

Not applicable. The site has been in use as a lumber mill since the early 1900's.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Parks, Wilderness, Wild and Scenic Rivers

None are needed at this time. In the future, the missing link in the Snoqualmie Valley Trail system will be constructed through the Mill Planning Area by King County. Additionally, the Mill Planning Area will provide a 20-foot wide area to the City for a Riverwalk Trail Corridor.

Threatened or Endangered Species

None are needed at this time. In connection with future development, the Mill Pond would be set aside and preserved as open space for recreation low-utility use and would not be developed for purposes other than public parks and trails.

Historic or Cultural Sites

None are needed at this time. The Pre-Annexation Agreement requires coordination with King County to consider potential adaptive re-use of the Snoqualmie Falls Lumber Company Powerhouse structures.

Wetlands

None are needed at this time. Mitigation Plans would be prepared in connection with future proposed development to provide compensation for activities, if any, proposed within sensitive areas and/or their buffers. Mitigation measures could include restoration and enhancement of existing wetlands, or creation of wetlands on other areas of the site.

Farmlands

Not applicable. The site has been in use as a lumber mill since the early 1900's.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The Mill Planning Area is designated as (1) Urban Conservancy Shoreline Environment, (2) Urban Floodplain Shoreline Environment, (3) Natural Environment, and (4) Aquatic Environment. The site is zoned for open space (Weyerhaeuser property), and Planned Commercial/Industrial District (SMV property). The PCI district permits a variety of commercial and industrial land uses.

No development is currently proposed and no impacts to land or shoreline use would occur from approval of the AIP. Future development would comply with the requirements of the City's Shoreline Master Program and applicable zoning regulations.

Proposed measures to avoid or reduce shoreline and land use impacts are:

None are needed at this time. Future development will require approval of a Shoreline Substantial Development Permit and a Planned Commercial/Industrial Plan from the City of Snoqualmie, which will ensure compatibility of uses and consistency with applicable policies and regulations.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

No development is currently proposed and approval of the AIP would not result in any impacts to transportation or public services and utilities. Future development will result in higher demands on transportation, public services, and utilities. Transportation increases cannot be quantified at this time and will be addressed in future environmental documents..

Proposed measures to reduce or respond to such demand(s) are:

None are needed at this time. Future development applications and detailed environmental review will evaluate the impacts of proposed development to the City and regional transportation system, and to utilities and public services. Mitigation measures will be identified consistent with City requirements and applicable SEPA policies. Such measures could include the implementation of transportation demand management strategies such as employee flex-time to reduce peak hour traffic demand, issuance of transit passes to encourage transit usage, formulation of vanpool/carpools to encourage development of high occupancy vehicles, and other similar measures.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The AIP is required by the City's Comprehensive Plan. Future development is required to be consistent with applicable City, state and federal requirements for protection of the natural and built environments. Future environmental review will identify any potential conflicts and appropriate measures to address them.