Appendix A

EIS Scoping Summary

King County SCRTS Project
EIS Scoping Summary

Background

This scoping summary provides an overview of the comment letters, e-mails and oral comments received through November 24, 2015 for the King County South Recycling and Transfer Station (SCRTS) Project Environmental Impact Statement (EIS).

Comments were received from the Muckleshoot Indian Tribe, four cities, one school district, two state agencies, 15 businesses and 219 individuals or households (Attachment A contains the list of respondents). The comments expressed concerns about potential impacts due to traffic, noise, odor, land use compatibility, light and glare, aesthetics, drainage, and wetlands.

Comment letters were organized by Tribes, Agencies, Businesses, and Individuals in alphabetical order; then individual comments were numbered. Comments were categorized by topic into: comments on the alternatives; comments on elements of the environment; secondary or cumulative impacts; mitigation; and comments on the proposed economic analysis. The matrix details the comment number(s) relating to each topic. Comments received from Tribes are indicated in the matrix with a "T"; comments from agencies are indicated with an "A"; comments from businesses are indicated with a "B", and comments from individuals are indicated with an "I".

Scoping comments in full are available in the project file at the King County Solid Waste Division and can also be viewed on the project website at http://your.kingcounty.gov/solidwaste/facilities/algona/index.asp. Attachment B to the full report includes delineated, numbered comments noted in the comment matrix.

Comment Matrix

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
Comments on the Alternatives					
Proposed Alternatives to be studied in the EIS	--	A1 A16 A20 A61 A80 A83 A92	B26 B33 B45 B48 B49 B58 B64 B71 B74 B76 B77 B85	I1 I4 I10 I13 I15 I29-I31 I38 I44 I46 I48 I50-I51 I56 I67 I69-I71 I81 I84 I88 I91-I92 I99 I113 I121-I126 I129-I130 I132-I136 I142-I144 I149-I155 I157 I164 I178 I184 I206 I215-I216 I218 I222 I225-I226 I231-I236 I246-I251 I254 I260 I263 I268 I278-I283	I332-I334 I337-I338 I340-I343 I346 I350-I352 I361-I363 I365-I369 I386 I404 I412-I413 I416 I418-I419 I432 I442 I448 I451-I457 I460 I473 I478 I486-I488 I495-I497 I502 I505-I507 I511 I518 I522 I525-I527 I535 I540 I547-I549 I553-I554 I561 I565 I569-I571 I576-I577 I583 I593 I598-I602 I605-I606 I620 I626

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
				I287 I289 I294-I305 I310-I313 I317-I318 I321 I325-I329	I661 I676 I680 I688 I690 I708 I714
Range of alternatives/other alternatives	--	A19 A21 A30 A33 A91	B27 B30 B57	I25 I45 I52 I245 I437 I490	I494 I566 I632 I664 I701
Alternatives considered and rejected	--	A35-A36 A81 A93	--	I14 I16 I19 I82 I127 I217 I345 I462	I465 I515 I614-I616 I645 I657 I681 I712
Purpose and need	--	A83 A90	B65	I32 I104 I185	I269-I270 I381 I446
Comments on the Elements of the Environment					
General	--	A39 A62 A64 A99 A109 A121	B3 B28 B34 B50	I101 I186 I191 I193 I293 I370	I382 I420 I441 I607 I672
Earth					
Geology	--	A2 A52-A53 A73-A74 A118	B4 B8	I187 I470 I493	
Soils (construction impacts)	--	A3	B4	I389 I528 I628	
Topography	--	--	B36	I580	
Erosion/enlargement of land area (accretion)	--	A4	--	I591 I595	

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
Air					
Air quality	--	A97	B9 B39	I24 I116 I188 I228 I237 I272 I309	I359 I383-I385 I424 I474 I585 I613 I622
Odor	--	A5	B10 B32 B46	I2 I6 I20 I28 I37 I39 I63 I163 I166 I175 I181 I188 I205 I227	I272 I335 I375 I405 I407 I464 I472 I532 I543 I604 I610 I653 I662 I707
Climate	--	--	--	I717	
Water					
Surface water movement/quantity/quality	T1	A6 A51 A52 A54 A60 A72 A73 A75 A117 A119	B5-B6 B11 B38 B68 B83	I17 I33 I55 I57 I90 I93 I115 I120 I141 I189 I200 I211 I275 I344 I349 I354 I377-I378 I409 I426 I433	I468 I475-I476 I503 I508 I519 I555-I557 I587 I627 I630 I633 I637 I647 I669 I671 I674 I689 I696 I698 I700 I718

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
Runoff/absorption (construction impacts; stormwater control)	--	A29 A50 A71 A87 A101 A116	--	I72 I85 I96 I106 I108 I146 I174 I219 I240	I257 I266 I421 I444 I563 I590 I624 I685
Floods	--	--	B11 B17 B43	I3 I17 I42 I58 I75 I120 I128 I156 I167 I173 I187 I212 I273	I355 I380 I425 I428 I469 I482 I501 I513 I558 I592 I597 I612 I660
Groundwater movement/quantity/quality	--	A55 A76 A98 A120 A127	--	I40 I59 I79 I111 I120 I189 I265	I356 I393 I395 I430 I439 I528 I551
Public water supplies	--	--	B31	I95 I162 I165 I208 I291 I390	I396 I499 I520 I639 I649 I678
Plants and Animals					
Habitat for and numbers or diversity of species of plants, fish, or other wildlife	--	--	B12 B37 B41 B84	I43 I60 I73 I78 I114 I118 I139 I177	I417 I422 I427 I449 I458 I501 I521 I533-I534

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
				I190	I559
				I201	I572
				I202	I625
				I227	I631
				I267	I640
				I274	I650
				I288	I656
				I306	I668
				I353	I687
				I357	I697
				I374	I699
				I402	I411
Unique species	--	--	B37	I168	
Fish or wildlife migration routes	--	--	B12	I170	I371
				I360	I716
Energy and natural resources					
Amount required/rate of use/ efficiency	--	--	--	--	
Source/availability	--	--	--	--	
Nonrenewable resources	--	--	--	--	
Conservation and renewable resources	--	--	--	I26	I682
				I603	
Scenic Resources	--	--	B13	I192	
Environmental health					
Noise	--	A103	B14	I8	I509
			B40	I23	I545
			B47	I28	I568
			B55	I62	I573
			B72	I117	I588
				I180	I611
				I286	I639
				I320	I652
				I376	I684
				I392	I702
				I485	
Risk of Explosion	--	--	B15	--	
Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials	--	A7	B15	I97	I623
		A102	B21	I466	I686
			B44	I621	
Land and shoreline use					
Relationship to existing land use plans and to estimated population	--	A8	B1	I11	I400
		A10-A11	B16	I34	I435
		A17	B18	I53	I438
		A24		I87	I484

Topic	Comments received from:				
	Tribes	Agencies	Businesses	Individuals	
		A34 A38 A58 A63 A78 A94 A123		I100 I105 I159 I169 I179 I194 I207 I209 I241 I253 I271 I331 I347 I491-I492	I516 I523 I539 I546 I552 I564 I579 I586 I642-I643 I648 I693 I695 I711
Light and glare	--	A13	B40	I22 I61 I117	I285 I290
Aesthetics	--	A12 A59 A79 A124	--	I646 I703 I710	
Historic and cultural preservation	--	--	--	I659	
Agricultural crops	--	--	B7	I480	I715
Transportation					
Transportation systems (including vehicular, pedestrian and bicycle)	--	A22 A27 A31 A41 A45 A105	B22	I41 I89 I198 I221	I224 I459 I578 I704
Vehicular traffic and access	--	A14 A18 A23 A28 A42 A46-A47 A66-A68 A82 A84-A85 A89 A111-113	B2 B19 B23 B51 B53 B60-B61 B67 B69 B79-B80	I2 I7 I12 I21 I27 I47 I49 I54 I64 I68 I74 I83 I86 I98	I423 I429 I434 I440 I443 I447 I450 I461 I467 I471 I477 I479 I483 I489

Topic	Comments received from:			
	Tribes	Agencies	Businesses	Individuals
				I102 I504 I107 I510 I112 I512 I131 I517 I137 I524 I139 I529 I145 I531 I147 I550 I160 I560 I171 I562 I182 I575 I195 I582 I204 I584 I220 I596 I223 I608-I609 I229 I617 I252 I629 I255-I256 I634-I635 I261 I644 I284 I655 I308 I662 I315 I667 I319 I670 I322 I673 I330 I675 I348 I677 I358 I683 I372 I691 I398 I694 I401 I705 I406 I709 I410 I713 I500
Waterborne, rail, and air traffic	--	A48 A69 114	B52 B62 B81	I431
Parking	--	--	--	--
Movement/circulation of people or goods	--	A49	--	--
Traffic hazards	--	A44	B20 B42 B63 B73 B82	I35 I445 I76 I541 I119 I636 I276 I665 I414
Public services and utilities				

Topic	Comments received from:			
	Tribes	Agencies	Businesses	Individuals
Fire	--	A57 A77 A122	B24	I196 I666
Police	--	A56 A77 A122	B24	I196 I666
Schools	--	A88-A89 A125-126	--	I199
Parks or other recreational facilities	--	A25 A37	--	I481
Maintenance	--	A15 A26 A43 A86	--	I176 I618 I196 I210 I324
Water/storm water	--	A107	--	I239 I242
Sewer/solid waste	--	A107	--	I80 I239 I94
Other governmental services or utilities	--	--	B24	--
Other Comments				
Secondary and Cumulative Impacts	--	A9 A108	--	I65
Mitigation	--	A100 A104 A106	--	I323 I581
Economic Analysis	--	A32 A40 A65 A70 A95-A96 A110 A115	B25 B29 B35 B54 B56 B59 B66 B70 B75 B78	I5 I373 I9 I379 I18 I387-I388 I36 I391 I66 I394 I77 I397 I103 I403 I110 I408 I138 I415 I148 I436 I158 I463 I161 I481 I172 I498 I183 I514 I197 I530 I203 I536-I538 I213-I214 I542 I230 I544 I238 I567

Topic	Comments received from:			
	Tribes	Agencies	Businesses	Individuals
				I243-I244 I574 I258-I259 I589 I262 I595 I264 I619 I277 I638 I292 I641 I307 I651 I314 I658 I316 I663 I336 I679 I339 I692 I364 I706

Attachment A – List of Respondents

Tribes

Muckleshoot Indian Tribe Fisheries Division, Karen Walter

Agencies

City of Algona
- Mayor Pro Tem Bill Thomas for Mayor David E. Hill
- Inslee Best for Mayor David E. Hill

City of Auburn
- Bill Peloza, Council Member
- Dennis Dowdy, Public Works Director
- Douglas Lein, Economic Development Manager
- Kevin H. Snyder, AICP, Planning and Development Director
- Jeff Tate, Interim Director of Planning and Development
- Joe Welsh, Transportation Planner

City of Federal Way
- Isaac Conlen, Planning Manager

City of Kent
- Gina Hungerford, Conservation Coordinator
- Tim LaPorte, PE, Public Works Director

Auburn School District
- Dr. Dennis "Kip" Herren, Former Superintendent
- Dr. Alan Spicciati, Superintendent

Washington Department of Ecology
- Robin Harrover, Hazardous Waste Specialist

Washington State Department of Transportation
- Felix Palisoc, Local Agency and Development Services Engineer

Businesses

Best Western Plus Peppertree
- Khara Nixon
- Rita Santillanes

Brekke Properties
- Eleanor and John Brekke

Logandale Water Association
- Jeff Spencer

Matzke Sales
- Mike Ingels

Oak Harbor Freight Lines
- Ed Vander Pol

The Outlet Collection | Seattle
- Greg Fleser

Pacific Inter-Mountain Distribution
- Erik Krippaehne

Rainier Audubon Society
- Alex Juchems
- Dan Streiffert

RW Scott Construction
- Jeff Scott

Schneider Homes
- Johanna Colman

Segale Properties
- Jamie Balint

Soldi Properties and Terra Dynamics
- Kevin Steiner

Lyn Ritchie
Span Alaska
Tom Landry
Tom Souply
System Three Resins
W. Kern Hendricks
Torr Technologies, Inc.
Greg Lindstrom

Individuals

Alegrete, Chris (I1)
Allmasas, J. (I2-I4)
Altick, Kathy (I5)
Alverson, Bruce (I6)
Anderson, Linda (I7-I9)
Anonymous (I10-I19, I413)
Babcock, Mark (I20-I25)
Baggett, Robert (I26-I29)
Bailey, Julie (I30)
Bailey, Timothy (I31)
Baker, Alan and Lori (l32-l38)
Bannister, Frank (l39-l44)
Barnett, Brian (l45, I701)
Blackwell, Sue Ellen (l46)
Blegen, Linda (l47-l50)
Blegen, Zane (l51-l52)
Boyd, Bill (l53-l66)
Boyd, Cathy (l67)
Boyles, Vern (l68)
Bradley, Kevin and Laurie (l69)
Breiling, Jon (l70)
Brekke, John (l437-l438, I641-I644, I692-I695)
Burdick, Christy (I702)
Busenius, Tina and Kelly (l71-l81, I635-I640)
Butler, Christopher (l82)
Calnan, John (l83-l84, I670)
Calnan, Terri (l85, I674)
Canfield, Tricia (l86)
Carlson, John and Natalie (l87)
Carney, Robert (l88-l91)
Carroll, Brendan (I414-I415, I661-I666)
Carroll, Cindy (l92)
Cerimole, Carol (l93-l96)
Chavez, Juan-Carlos (I97-I99)
Chmielinski, Helen (l100)
Coleman, Shelley (l101-l104)
Coles, Delana and Ed (l105-112)
Condotta, Bob (l113)
Cooper-Juchems, Alex and Sue (l114-l121)
Coulston, Diane (l122)
Cowan Sally (l123-l124)
Cowman, Brett (l125)
Craig (l126)
Cripe, Pat (l127)
Crivellone, Anthony (I672)
Cummings, Kathleen (l128-l129, l416-l418, I680-I681)
Darrow, Jim (l130)
Darrow, Karen (l131-l132)
De Donato, James (l133)
Dean, Michael (l134-l135)
Deaver, Doreen (l137-l136, I673)
DeLancey, Colette (l138-l142)
DeSimone, Bruno (l143-l144)
Dickson, Jamma (l145-l146)
Dimmitt, Katy (l147)
Donley, Roseanna (l392-l397, l433-l436)
Donnelly, Chase (I703-I704)
Dotson, Scot (l148)
Downing, John (l149, I705-I708)
Eberly, Steve (l150)
Edd, Judy (l151)
Eneberg, Michael (l152-l153)
Erickson, Jim (l154)
Evans, Serena (l155-l157)
Ferguson, Tonja (l158-l161)
Fife, Scott (l162-l164)
Fife, Shelley (l165-l170)
Finley, Sharon (l171-l178)
Fisher, David and Kim (l179-l183)
Flanagan, Cindy (l184-l203, l425-l427, I671, I688-I689)
Gerrard, Leana (l204-l206)

Gilbertson, Gail (l207-l214, I648-I651)
Gillis, Michelle (l215)
Gorder, Jeffrey (l216)
Greenheck, Kim (l217)
Gunderson, Doug (I709)
Hales, John and Cheri (I710)
Hall, Mary (l218)
Halstead, Janice (l219-l222)
Hamil, John (l223)
Hancock, Roger (l224)
Hansen, Mavis (l225)
Hanson, Karen and Monte (l226, l231, l398-l399)
Hanson, Keith (l227-l230, l232)
Harbaugh, John (l400-l401)
Harkness, Jonathan (l233)
Harkness, Marie-Anne (l234-l235, I659-I660)
Harvie, Amy (l236-l237)
Heiman, Mara (l238-l248)
Hendrickson, Jeff (l249)
Huber, Vernon (l250)
Ison, Calvin (l251)
Jackson, Jaimi (l252-l254)
Jeannie (l255)
Johnson, Donna (l256-l258)
Johnson, Dottie (l259)
Johnston, Karen (I645-I646)
Jones, Jeanie260-l263)
Jones, Laurie (l264)
Jordan, Martha (l265-l267)
Juan-Roque, Marie (l268)
Juchems, Sara (I668-I669, I699-I700)
Keck, Chad (l269)
Keller, Cynthia (l270-l278)
Keller, Katie (l279-l280)
Knapp, James (l281)
Knopff, Greg (l428-l432)
Lagerquist, Don (l282)
Lalime, Ronald (l387-l391)
Lance, Margaret (l283)
Langholz, Kenneth (l284-l287)
Larimore, Sherrie (l288-l289)
Latvala, Nancy (l290-l293)
Lindenauer, Ginger (l294-l297, I633-I634, I690-I691)
Lindenauer, Jon (l298-l301, l369-l382, I630-I632, I696-I698)
Lindenauer, Kris (l302)
Lindstrom, Greg (l303)
Logan, Gerald (l304, I686)
Logan, Robin (l305)
Lunde, Jeanie (l306-l310)
Lyndemere, Marie (l311)
Mangione, Paul and Rosemary (l312-l316)
Maribel (l317)
Marshall, John (l318)
Martin, David (l319-l321)
Martin, Lisa (l322-l325)
McClure, K.R. (I711)
McGuire, Jeff (l326)
McKnight, Chet and Carmen (l327)
Mendoza, Gabriel (l328)
Messick, Dave and Loretta (l329-l332)
Meyers, Wendy (l333)
Mierau, Julie (I652-I658)
Mikrut, John (l334-l339)
Miller, John (l340)
Mills, Katy (l341)
Minnick, Ben (l342)
Monasmith, Kevin (l343-l344)
Morris, Wade (l345)
Moser, Angelique (I346-I349)
Myers, Bob (l350, I683-I685)
Nelson, G. (l351)
Nesbitt, Sandra (l352-l360, l439-l441)
Newton, Karen (l361-l362)
Norton, Lloyd (l363-l365)
Norton, Marilyn (l366)
Obrien, Michael (l367)
Oosterink, Michele (l368)
Orsini, Dan and Monica (l442-l444)
Padvorac, Roger (l445-l447)
Poirier, Tad (l448)
Pond, Brian and Carrie (l449-l451)
Pondelick, Scot (l452)
Ponis, David (I712)
Poulsen, Janine (l453-l454)

PR (l455)
Pu, Quisheng (l456)
Puetz, Cindy (l410-l412, I667)
Pulliam, J. (l457-l459)
Pulliam, Marjorie (l460-l465)
Putnam, Joshua (l466-l470)
Pyatt, Tina (l471-l473)
Ramil, Jurgen (l402-l404, l474)
Randall, Calen (l422, I647, I687)
Randall, Cameron (l475-l477)
Randall, Carley (l423-l424)
Rea-Castor, Ileana (I713)
Reilly, Kristine (l478)
Reynolds, Elizabeth (l479-l480)
Riker, Jodi (l481)
Ritchey, Eric (l482-l485)
Rowe, Patricia (l486)
Ruppel, Lisa (l487)
Ruppel, Mason (l383-l386, l488-l489)
Rust, Steven (l490-l494)
Sack, Peter (l495-l497)
Satoran, Victoria (l404-l409, l498-l502)
Satoran, William (l503-l505)
Schell, S. Charles (l506)
Schnorr, Melvin (l507)
Scott, Jeff (l508-l515, I677-I679)
Scott, Lorrie (l516-l517)
Scott, Tyler (l518)
Shoemaker, Beth (l519-l524)
Sinclair, Danielle (l525)
Snowdon, Charles (l526)
Snowdon, Gaile (l527)
Souply, Tom (I675-I676)
Spaulding, Russ (l528-l535, I626-I629)
Spencer, Jeff (l536-l539)
Spoonts, Lisa (l540-l541)
Starr, Ruth and Bob (l542
Stepan, Donald (l543-l546)
Stevenson, D.L. (l547)
Struck, Marla (l548)
Struck, Thomas (l549-l554)
Stumbo, Jim (l555)
Stumpf, Phil (l556-l560)
Taylor, John (l561)
Tiangsing, Bonnie (l562-l576)
Tran, Son (l577)
Treichel, Michelle (l578-l581)
Vance, Danielle (l582)
Vasquez, Ernesto (l583-l585)
Watson, Tom (l586-l587)
Wenger, Chris (l288-l599)
Widener, Robert (l600)
Widger, Tonya (l419-l421)
Wilkes, Susan (l601-l602)
Wilkinson, Richard (I714)
Williams, Doug (l603, I682)
Willms, Susan (l604)
Wingard, Greg (I715-I718)
Wold, Fran (l605)
Woolley, Keith (l606-l613)
Yesun, E. (l614)
Zeillmann, Kimberly (l615-l616)
Zeller, Craig (l617-l620)
Zummack, Rudolf (l621-l625)

Appendix B

Wetland Rating and Data Forms

Wetland name or number Auburn C Strat

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Auburn C Strat Date of site visit: 10-12-15

Rated by Paul Hamidi Trained by Ecology? X Yes ___ No Date of training 2013

HGM Class used for rating Depressional Wetland has multiple HGM classes? ___ Y X N

NOTE: Form is not complete without the figures requested *(figures can be combined).*

Source of base aerial photo/map ESRI Basemap Imagery

OVERALL WETLAND CATEGORY IV (based on functions ✓ or special characteristics ___)

1. Category of wetland based on FUNCTIONS

___ **Category I** – Total score = 23 - 27

___ **Category II** – Total score = 20 - 22

___ **Category III** – Total score = 16 - 19

✓ **Category IV** – Total score = 9 - 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
		Circle the appropriate ratings		
Site Potential	H (M) L	H (M) L	H M (L)	
Landscape Potential	H (M) L	(H) M L	H M (L)	
Value	H (M) L	H M (L)	H M (L)	TOTAL
Score Based on Ratings	6	6	3	15

Score for each function based on three ratings *(order of ratings is not important)*

9 = H,H,H
8 = H,H,M
7 = H,H,L
7 = H,M,M
6 = H,M,L
6 = M,M,M
5 = H,L,L
5 = M,M,L
4 = M,L,L
3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	I II
Wetland of High Conservation Value	I
Bog	I
Mature Forest	I
Old Growth Forest	I
Coastal Lagoon	I II
Interdunal	I II III IV
None of the above	✓

Wetland name or number Auburn C street

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	A
Hydroperiods	D 1.4, H 1.2	B
Location of outlet *(can be added to map of hydroperiods)*	D 1.1, D 4.1	B
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	D 2.2, D 5.2	A
Map of the contributing basin	D 4.3, D 5.3	C
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	D
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	E
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	E

Riverine Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Ponded depressions	R 1.1	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	R 2.4	
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	
Width of unit vs. width of stream *(can be added to another figure)*	R 4.1	
Map of the contributing basin	R 2.2, R 2.3, R 5.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	

Lake Fringe Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	L 1.1, L 4.1, H 1.1, H 1.4	
Plant cover of trees, shrubs, and herbaceous plants	L 1.2	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	L 2.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	L 3.1, L 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	L 3.3	

Slope Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Plant cover of **dense** trees, shrubs, and herbaceous plants	S 1.3	
Plant cover of **dense, rigid** trees, shrubs, and herbaceous plants *(can be added to figure above)*	S 4.1	
Boundary of 150 ft buffer (can be added to another figure)	S 2.1, S 5.1	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	

Wetland name or number C Street

HGM Classification of Wetlands in Western Washington

For questions 1-7, the criteria described must apply to the entire unit being rated.

If the hydrologic criteria listed in each question do not apply to the entire unit being rated, you probably have a unit with multiple HGM classes. In this case, identify which hydrologic criteria in questions 1-7 apply, and go to Question 8.

1. Are the water levels in the entire unit usually controlled by tides except during floods?

NO → go to 2 **YES** – the wetland class is **Tidal Fringe** – go to 1.1

1.1 Is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

NO – Saltwater Tidal Fringe (Estuarine) **YES – Freshwater Tidal Fringe**
*If your wetland can be classified as a Freshwater Tidal Fringe use the forms for **Riverine** wetlands. If it is Saltwater Tidal Fringe it is an **Estuarine** wetland and is not scored. This method **cannot** be used to score functions for estuarine wetlands.*

2. The entire wetland unit is flat and precipitation is the only source (>90%) of water to it. Groundwater and surface water runoff are NOT sources of water to the unit.

NO → go to 3 **YES** – The wetland class is **Flats**
*If your wetland can be classified as a Flats wetland, use the form for **Depressional** wetlands.*

3. Does the entire wetland unit **meet all** of the following criteria?
___The vegetated part of the wetland is on the shores of a body of permanent open water (without any plants on the surface at any time of the year) at least 20 ac (8 ha) in size;
___At least 30% of the open water area is deeper than 6.6 ft (2 m).

NO → go to 4 **YES** – The wetland class is **Lake Fringe** (Lacustrine Fringe)

4. Does the entire wetland unit **meet all** of the following criteria?
___The wetland is on a slope (*slope can be very gradual*),
___The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks,
___The water leaves the wetland **without being impounded**.

NO → go to 5 **YES** – The wetland class is **Slope**

NOTE: Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 ft diameter and less than 1 ft deep).

5. Does the entire wetland unit **meet all** of the following criteria?
___The unit is in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river,
___The overbank flooding occurs at least once every 2 years.

Wetland name or number C St.

NO – go to 6 **YES** – The wetland class is **Riverine**

NOTE: The Riverine unit can contain depressions that are filled with water when the river is not flooding

6. Is the entire wetland unit in a topographic depression in which water ponds, or is saturated to the surface, at some time during the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

NO – go to 7 **YES** – The wetland class is **Depressional**

7. Is the entire wetland unit located in a very flat area with no obvious depression and no overbank flooding? The unit does not pond surface water more than a few inches. The unit seems to be maintained by high groundwater in the area. The wetland may be ditched, but has no obvious natural outlet.

NO – go to 8 **YES** – The wetland class is **Depressional**

8. Your wetland unit seems to be difficult to classify and probably contains several different HGM classes. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a Depressional wetland has a zone of flooding along its sides. GO BACK AND IDENTIFY WHICH OF THE HYDROLOGIC REGIMES DESCRIBED IN QUESTIONS 1-7 APPLY TO DIFFERENT AREAS IN THE UNIT (make a rough sketch to help you decide). Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within the wetland unit being scored.

NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland unit being rated. If the area of the HGM class listed in column 2 is less than 10% of the unit; classify the wetland using the class that represents more than 90% of the total area.

HGM classes within the wetland unit being rated	HGM class to use in rating
Slope + Riverine	Riverine
Slope + Depressional	Depressional
Slope + Lake Fringe	Lake Fringe
Depressional + Riverine along stream within boundary of depression	Depressional
Depressional + Lake Fringe	Depressional
Riverine + Lake Fringe	Riverine
Salt Water Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE

*If you are still unable to determine which of the above criteria apply to your wetland, or if you have **more than 2 HGM classes** within a wetland boundary, classify the wetland as Depressional for the rating.*

Wetland name or number C St.

DEPRESSIONAL AND FLATS WETLANDS

Water Quality Functions - Indicators that the site functions to improve water quality

D 1.0. Does the site have the potential to improve water quality?	
D 1.1. Characteristics of surface water outflows from the wetland: Wetland is a depression or flat depression (QUESTION 7 on key) with no surface water leaving it (no outlet). points = 3 Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet. points = 2 Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing points = 1 Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch. points = 1	3
D 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic *(use NRCS definitions)*. Yes = 4 No = 0	0
D 1.3. Characteristics and distribution of persistent plants (Emergent, Scrub-shrub, and/or Forested Cowardin classes): Wetland has persistent, ungrazed, plants > 95% of area points = 5 Wetland has persistent, ungrazed, plants > ½ of area points = 3 Wetland has persistent, ungrazed plants > $^1/_{10}$ of area points = 1 Wetland has persistent, ungrazed plants < $^1/_{10}$ of area points = 0	5
D 1.4. Characteristics of seasonal ponding or inundation: *This is the area that is ponded for at least 2 months. See description in manual.* Area seasonally ponded is > ½ total area of wetland points = 4 Area seasonally ponded is > ¼ total area of wetland points = 2 Area seasonally ponded is < ¼ total area of wetland points = 0	2
Total for D 1 Add the points in the boxes above	10

Rating of Site Potential If score is: ___ **12-16 = H** X **6-11 = M** ___ **0-5 = L** *Record the rating on the first page*

D 2.0. Does the landscape have the potential to support the water quality function of the site?	
D 2.1. Does the wetland unit receive stormwater discharges? Yes = 1 No = 0	1
D 2.2. Is > 10% of the area within 150 ft of the wetland in land uses that generate pollutants? Yes = 1 No = 0	1
D 2.3. Are there septic systems within 250 ft of the wetland? Yes = 1 No = 0	0
D 2.4. Are there other sources of pollutants coming into the wetland that are not listed in questions D 2.1-D 2.3? Source_____ Yes = 1 No = 0	0
Total for D 2 Add the points in the boxes above	2

Rating of Landscape Potential If score is: ___ **3 or 4 = H** X **1 or 2 = M** ___ **0 = L** *Record the rating on the first page*

D 3.0. Is the water quality improvement provided by the site valuable to society?	
D 3.1. Does the wetland discharge directly (i.e., within 1 mi) to a stream, river, lake, or marine water that is on the 303(d) list? Yes = 1 No = 0	0
D 3.2. Is the wetland in a basin or sub-basin where an aquatic resource is on the 303(d) list? Yes = 1 No = 0	1
D 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality (*answer YES if there is a TMDL for the basin in which the unit is found*)? Yes = 2 No = 0	0
Total for D 3 Add the points in the boxes above	1

Rating of Value If score is: ___ **2-4 = H** X **1 = M** ___ **0 = L** *Record the rating on the first page*

Wetland name or number C St.

DEPRESSIONAL AND FLATS WETLANDS

Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradation

D 4.0. Does the site have the potential to reduce flooding and erosion?

D 4.1. Characteristics of surface water outflows from the wetland:

Wetland is a depression or flat depression with no surface water leaving it (no outlet)	points = 4	4
Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet	points = 2	
Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch	points = 1	
Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing	points = 0	

D 4.2. Depth of storage during wet periods: *Estimate the height of ponding above the bottom of the outlet. For wetlands with no outlet, measure from the surface of permanent water or if dry, the deepest part.*

Marks of ponding are 3 ft or more above the surface or bottom of outlet	points = 7	3
Marks of ponding between 2 ft to < 3 ft from surface or bottom of outlet	points = 5	
Marks are at least 0.5 ft to < 2 ft from surface or bottom of outlet	points = (3)	
The wetland is a "headwater" wetland	points = 3	
Wetland is flat but has small depressions on the surface that trap water	points = 1	
Marks of ponding less than 0.5 ft (6 in)	points = 0	

D 4.3. Contribution of the wetland to storage in the watershed: *Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland unit itself.*

The area of the basin is less than 10 times the area of the unit	points = 5	3
The area of the basin is 10 to 100 times the area of the unit	points = 3	
The area of the basin is more than 100 times the area of the unit	points = 0	
Entire wetland is in the Flats class	points = 5	

Total for D 4	Add the points in the boxes above	10

Rating of Site Potential If score is: ___ **12-16 = H** X **6-11 = M** ___ **0-5 = L** *Record the rating on the first page*

D 5.0. Does the landscape have the potential to support hydrologic functions of the site?

D 5.1. Does the wetland receive stormwater discharges?	Yes = 1 No = 0	1
D 5.2. Is >10% of the area within 150 ft of the wetland in land uses that generate excess runoff?	Yes = 1 No = 0	1
D 5.3. Is more than 25% of the contributing basin of the wetland covered with intensive human land uses (residential at >1 residence/ac, urban, commercial, agriculture, etc.)?	Yes = 1 No = 0	1
Total for D 5	Add the points in the boxes above	3

Rating of Landscape Potential If score is: X **3 = H** ___ **1 or 2 = M** ___ **0 = L** *Record the rating on the first page*

D 6.0. Are the hydrologic functions provided by the site valuable to society?

D 6.1. The unit is in a landscape that has flooding problems. *Choose the description that best matches conditions around the wetland unit being rated. Do not add points. Choose the highest score if more than one condition is met.*

The wetland captures surface water that would otherwise flow down-gradient into areas where flooding has damaged human or natural resources (e.g., houses or salmon redds):

- Flooding occurs in a sub-basin that is immediately down-gradient of unit. points = 2
- Surface flooding problems are in a sub-basin farther down-gradient. points = 1

Flooding from groundwater is an issue in the sub-basin. points = 1

The existing or potential outflow from the wetland is so constrained by human or natural conditions that the water stored by the wetland cannot reach areas that flood. *Explain why* wetland is de-coupled from downstream flooding. points = (0)

There are no problems with flooding downstream of the wetland. points = 0

0

D 6.2. Has the site been identified as important for flood storage or flood conveyance in a regional flood control plan? Yes = 2 No = 0 — 0

Total for D 6	Add the points in the boxes above	0

Rating of Value If score is: ___ **2-4 = H** ___ **1 = M** X **0 = L** *Record the rating on the first page*

Wetland name or number C St.

These questions apply to wetlands of all HGM classes.

HABITAT FUNCTIONS - Indicators that site functions to provide important habitat

H 1.0. Does the site have the potential to provide habitat?

H 1.1. Structure of plant community: *Indicators are Cowardin classes and strata within the Forested class.* Check the Cowardin plant classes in the wetland. *Up to 10 patches may be combined for each class to meet the threshold of ¼ ac or more than 10% of the unit if it is smaller than 2.5 ac. Add the number of structures checked.*

____Aquatic bed	4 structures or more: points = 4
_X_ Emergent	3 structures: points = 2
_X_ Scrub-shrub (areas where shrubs have > 30% cover)	2 structures: points = 1
____Forested (areas where trees have > 30% cover)	1 structure: points = 0

If the unit has a Forested class, check if:

____The Forested class has 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) that each cover 20% within the Forested polygon

1

H 1.2. Hydroperiods

Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or ¼ ac to count (*see text for descriptions of hydroperiods*).

____Permanently flooded or inundated	4 or more types present: points = 3
_X_ Seasonally flooded or inundated	3 types present: points = 2
____Occasionally flooded or inundated	2 types present: points = 1
_X_ Saturated only	1 type present: points = 0
____Permanently flowing stream or river in, or adjacent to, the wetland	
____Seasonally flowing stream in, or adjacent to, the wetland	
____**Lake Fringe wetland**	**2 points**
____**Freshwater tidal wetland**	**2 points**

1

H 1.3. Richness of plant species

Count the number of plant species in the wetland that cover at least 10 ft^2.

Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. ***Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle***

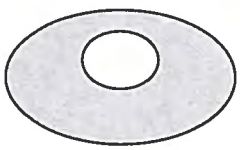
If you counted: > 19 species	points = 2
5 - 19 species	points = 1
< 5 species	points = 0

1

H 1.4. Interspersion of habitats

Decide from the diagrams below whether interspersion among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always high.*

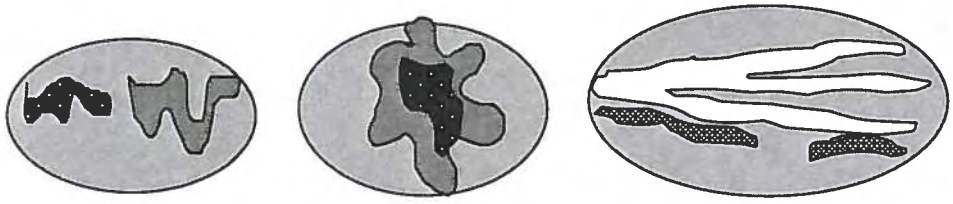
None = 0 points



Low = 1 point

Moderate = 2 points

All three diagrams in this row are **HIGH** = 3points



1

Wetland name or number C st.

H 1.5. Special habitat features: Check the habitat features that are present in the wetland. *The number of checks is the number of points.* ____Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). ____Standing snags (dbh > 4 in) within the wetland ____Undercut banks are present for at least 6.6 ft (2 m) **and/or** overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft (10 m) ____Stable steep banks of fine material that might be used by beaver or muskrat for denning (> 30 degree slope) OR signs of recent beaver activity are present *(cut shrubs or trees that have not yet weathered where wood is exposed)* ____At least ¼ ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated *(structures for egg-laying by amphibians)* ____Invasive plants cover less than 25% of the wetland area in every stratum of plants (*see H 1.1 for list of strata*)	0
Total for H 1 Add the points in the boxes above	4

Rating of Site Potential If score is:___**15-18 = H** ___**7-14 = M** X **0-6 = L** *Record the rating on the first page*

H 2.0. Does the landscape have the potential to support the habitat functions of the site?	
H 2.1. Accessible habitat (include *only habitat that directly abuts wetland unit*). *Calculate:* % undisturbed habitat <1 + [(% moderate and low intensity land uses)/2] 0 = <1 % If total accessible habitat is: > 1/3 (33.3%) of 1 km Polygon points = 3 20-33% of 1 km Polygon points = 2 10-19% of 1 km Polygon points = 1 < 10% of 1 km Polygon points = 0	0
H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. *Calculate:* % undisturbed habitat <1 + [(% moderate and low intensity land uses)/2] 0 = <1 % Undisturbed habitat > 50% of Polygon points = 3 Undisturbed habitat 10-50% and in 1-3 patches points = 2 Undisturbed habitat 10-50% and > 3 patches points = 1 Undisturbed habitat < 10% of 1 km Polygon points = 0	0
H 2.3. Land use intensity in 1 km Polygon: If > 50% of 1 km Polygon is high intensity land use points = (- 2) ≤ 50% of 1 km Polygon is high intensity points = 0	-2
Total for H 2 Add the points in the boxes above	-2

Rating of Landscape Potential If score is:___**4-6 = H** ___**1-3 = M** X **< 1 = L** *Record the rating on the first page*

H 3.0. Is the habitat provided by the site valuable to society?	
H 3.1. Does the site provide habitat for species valued in laws, regulations, or policies? *Choose only the highest score that applies to the wetland being rated.* Site meets ANY of the following criteria: points = 2 — It has 3 or more priority habitats within 100 m (see next page) — It provides habitat for Threatened or Endangered species (any plant or animal on the state or federal lists) — It is mapped as a location for an individual WDFW priority species — It is a Wetland of High Conservation Value as determined by the Department of Natural Resources — It has been categorized as an important habitat site in a local or regional comprehensive plan, in a Shoreline Master Plan, or in a watershed plan Site has 1 or 2 priority habitats (listed on next page) within 100 m points = 1 Site does not meet any of the criteria above points = 0	0

Rating of Value If score is:___**2 = H** ___**1 = M** X **0 = L** *Record the rating on the first page*

Wetland name or number C St.

WDFW Priority Habitats

Priority habitats listed by WDFW (see complete descriptions of WDFW priority habitats, and the counties in which they can be found, in: Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. http://wdfw.wa.gov/publications/00165/wdfw00165.pdf or access the list from here: http://wdfw.wa.gov/conservation/phs/list/)

Count how many of the following priority habitats are within 330 ft (100 m) of the wetland unit: ***NOTE:*** *This question is independent of the land use between the wetland unit and the priority habitat.*

— **Aspen Stands:** Pure or mixed stands of aspen greater than 1 ac (0.4 ha).

— **Biodiversity Areas and Corridors**: Areas of habitat that are relatively important to various species of native fish and wildlife (*full descriptions in WDFW PHS report*).

— **Herbaceous Balds:** Variable size patches of grass and forbs on shallow soils over bedrock.

— **Old-growth/Mature forests:** Old-growth west of Cascade crest – Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) > 32 in (81 cm) dbh or > 200 years of age. Mature forests – Stands with average diameters exceeding 21 in (53 cm) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80-200 years old west of the Cascade crest.

— **Oregon White Oak:** Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is important (*full descriptions in WDFW PHS report p. 158 – see web link above*).

— **Riparian**: The area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.

— **Westside Prairies:** Herbaceous, non-forested plant communities that can either take the form of a dry prairie or a wet prairie (*full descriptions in WDFW PHS report p. 161 – see web link above*).

— **Instream:** The combination of physical, biological, and chemical processes and conditions that interact to provide functional life history requirements for instream fish and wildlife resources.

— **Nearshore**: Relatively undisturbed nearshore habitats. These include Coastal Nearshore, Open Coast Nearshore, and Puget Sound Nearshore. (*full descriptions of habitats and the definition of relatively undisturbed are in WDFW report – see web link on previous page).*

— **Caves:** A naturally occurring cavity, recess, void, or system of interconnected passages under the earth in soils, rock, ice, or other geological formations and is large enough to contain a human.

— **Cliffs:** Greater than 25 ft (7.6 m) high and occurring below 5000 ft elevation.

— **Talus:** Homogenous areas of rock rubble ranging in average size 0.5 - 6.5 ft (0.15 - 2.0 m), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.

— **Snags and Logs:** Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 20 in (51 cm) in western Washington and are > 6.5 ft (2 m) in height. Priority logs are > 12 in (30 cm) in diameter at the largest end, and > 20 ft (6 m) long.

Note: All vegetated wetlands are by definition a priority habitat but are not included in this list because they are addressed elsewhere.

C:\GIS\Projects\KingCounty\mxd\wetlandratings\WetlandCStSW_CowardinPlantClasses.mxd
Date: 10/13/2015 | joel_hancock

Figure A

Cowardin Classes

C St SW Wetland
King County SCRTS

C:\GIS\Projects\KingCounty\mxd\wetlandratings\WetlandCStSW_Hydroperiod.mxd
Date: 10/13/2015 | joel_hancock

Figure B

Hydroperiods

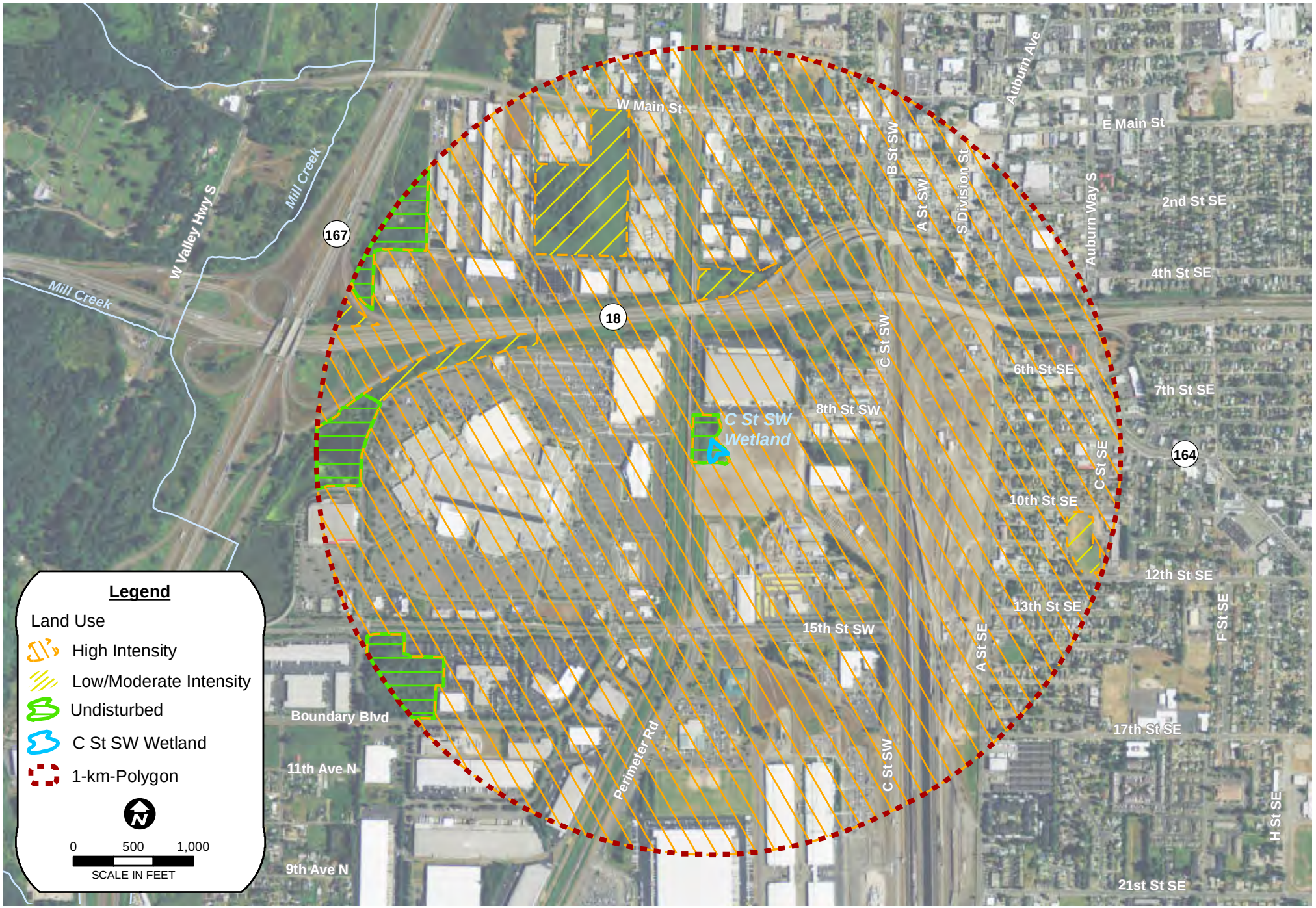
C St SW Wetland
King County SCRTS

C:\GIS\Projects\KingCounty\mxd\wetlandratings\WetlandCStSW_ContributingBasin.mxd
Date: 10/13/2015 | joel_hancock

Figure C

Contributing Basin

C St SW Wetland
King County SCRTS



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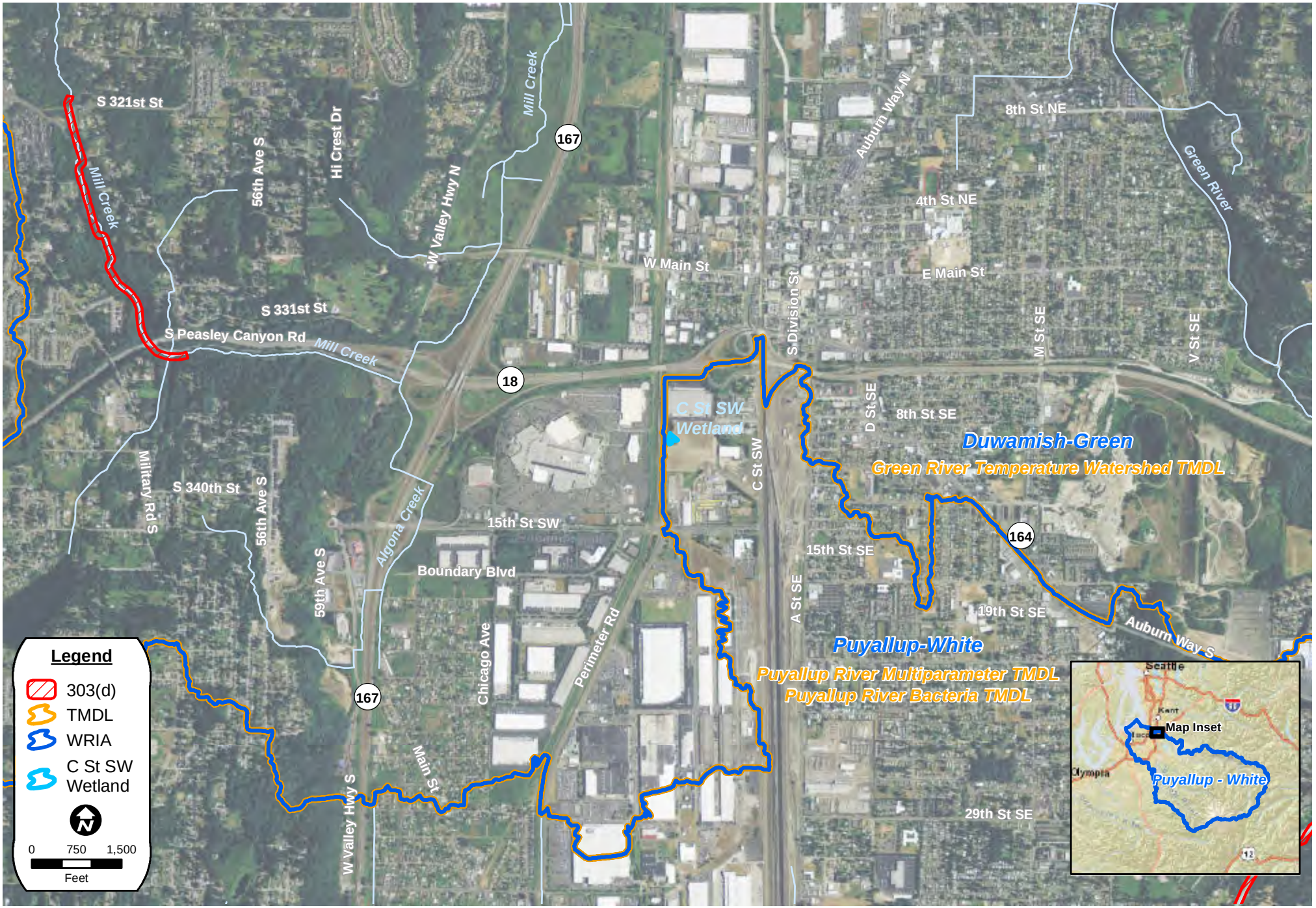
Date: 10/6/2015 | joel_hancock

Figure D

Accessible and Undisturbed Habitat in 1 KM Polygon

C St SW Wetland
King County SCRTS



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Date: 10/13/2015 | joel_hancock

Figure E

303 (d) Waters, WRIAs, and TMDLs

Wetland name or number A

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Algona - Wetland A Date of site visit: 9-10-15

Rated by Paul Hamidi Trained by Ecology? X Yes ___No Date of training 2013

HGM Class used for rating Depressional Wetland has multiple HGM classes? X Y ___N

NOTE: Form is not complete without the figures requested *(figures can be combined).*

Source of base aerial photo/map ESRI Basemap Imagery

OVERALL WETLAND CATEGORY III (based on functions ✓ or special characteristics___)

1. Category of wetland based on FUNCTIONS

___**Category I** – Total score = 23 - 27

___**Category II** – Total score = 20 - 22

__X__**Category III** – Total score = 16 - 19

___**Category IV** – Total score = 9 - 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
	Circle the appropriate ratings			
Site Potential	H (M) L	H M (L)	H (M) L	
Landscape Potential	H (M) L	(H) M L	H (M) L	
Value	(H) M L	H (M) L	H (M) L	TOTAL
Score Based on Ratings	7	6	6	19

Score for each function based on three ratings *(order of ratings is not important)*

9 = H,H,H
8 = H,H,M
7 = H,H,L
7 = H,M,M
6 = H,M,L
6 = M,M,M
5 = H,L,L
5 = M,M,L
4 = M,L,L
3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	I II
Wetland of High Conservation Value	I
Bog	I
Mature Forest	I
Old Growth Forest	I
Coastal Lagoon	I II
Interdunal	I II III IV
None of the above	✓

Wetland name or number A

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	A
Hydroperiods	D 1.4, H 1.2	B
Location of outlet *(can be added to map of hydroperiods)*	D 1.1, D 4.1	B
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	D 2.2, D 5.2	A
Map of the contributing basin	D 4.3, D 5.3	C
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	D
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	E
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	E

Riverine Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Ponded depressions	R 1.1	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	R 2.4	
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	
Width of unit vs. width of stream *(can be added to another figure)*	R 4.1	
Map of the contributing basin	R 2.2, R 2.3, R 5.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	

Lake Fringe Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	L 1.1, L 4.1, H 1.1, H 1.4	
Plant cover of trees, shrubs, and herbaceous plants	L 1.2	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	L 2.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	L 3.1, L 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	L 3.3	

Slope Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Plant cover of **dense** trees, shrubs, and herbaceous plants	S 1.3	
Plant cover of **dense, rigid** trees, shrubs, and herbaceous plants *(can be added to figure above)*	S 4.1	
Boundary of 150 ft buffer (can be added to another figure)	S 2.1, S 5.1	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	

Wetland name or number A

HGM Classification of Wetlands in Western Washington

For questions 1-7, the criteria described must apply to the entire unit being rated.

If the hydrologic criteria listed in each question do not apply to the entire unit being rated, you probably have a unit with multiple HGM classes. In this case, identify which hydrologic criteria in questions 1-7 apply, and go to Question 8.

1. Are the water levels in the entire unit usually controlled by tides except during floods?

   NO - go to 2 **YES** – the wetland class is **Tidal Fringe** – go to 1.1

   1.1 Is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

   NO – Saltwater Tidal Fringe (Estuarine) **YES – Freshwater Tidal Fringe**
   *If your wetland can be classified as a Freshwater Tidal Fringe use the forms for **Riverine** wetlands. If it is Saltwater Tidal Fringe it is an **Estuarine** wetland and is not scored. This method **cannot** be used to score functions for estuarine wetlands.*

2. The entire wetland unit is flat and precipitation is the only source (>90%) of water to it. Groundwater and surface water runoff are NOT sources of water to the unit.

   NO - go to 3 **YES** – The wetland class is **Flats**
   *If your wetland can be classified as a Flats wetland, use the form for **Depressional** wetlands.*

3. Does the entire wetland unit **meet all** of the following criteria?
   ___The vegetated part of the wetland is on the shores of a body of permanent open water (without any plants on the surface at any time of the year) at least 20 ac (8 ha) in size;
   ___At least 30% of the open water area is deeper than 6.6 ft (2 m).

   NO - go to 4 **YES** – The wetland class is **Lake Fringe** (Lacustrine Fringe)

4. Does the entire wetland unit **meet all** of the following criteria?
   ___The wetland is on a slope (*slope can be very gradual*),
   ___The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks,
   ___The water leaves the wetland **without being impounded.**

   NO - go to 5 **YES** – The wetland class is **Slope**

   NOTE: Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 ft diameter and less than 1 ft deep).

5. Does the entire wetland unit **meet all** of the following criteria?
   ___The unit is in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river,
   ___The overbank flooding occurs at least once every 2 years.

Wetland name or number A

(NO) go to 6 **YES** – The wetland class is **Riverine**

NOTE: The Riverine unit can contain depressions that are filled with water when the river is not flooding

6. Is the entire wetland unit in a topographic depression in which water ponds, or is saturated to the surface, at some time during the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

(NO) go to 7 **YES** – The wetland class is **Depressional**

7. Is the entire wetland unit located in a very flat area with no obvious depression and no overbank flooding? The unit does not pond surface water more than a few inches. The unit seems to be maintained by high groundwater in the area. The wetland may be ditched, but has no obvious natural outlet.

(NO) go to 8 **YES** – The wetland class is **Depressional**

8. Your wetland unit seems to be difficult to classify and probably contains several different HGM classes. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a Depressional wetland has a zone of flooding along its sides. GO BACK AND IDENTIFY WHICH OF THE HYDROLOGIC REGIMES DESCRIBED IN QUESTIONS 1-7 APPLY TO DIFFERENT AREAS IN THE UNIT (make a rough sketch to help you decide). Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within the wetland unit being scored.

NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland unit being rated. If the area of the HGM class listed in column 2 is less than 10% of the unit; classify the wetland using the class that represents more than 90% of the total area.

	HGM classes within the wetland unit being rated	HGM class to use in rating
X	Slope + Riverine	Riverine
X	Slope + Depressional	Depressional
	Slope + Lake Fringe	Lake Fringe
X	Depressional + Riverine along stream within boundary of depression	Depressional
	Depressional + Lake Fringe	Depressional
	Riverine + Lake Fringe	Riverine
	Salt Water Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE

*If you are still unable to determine which of the above criteria apply to your wetland, or if you have **more than 2 HGM classes** within a wetland boundary, classify the wetland as Depressional for the rating.*

Wetland name or number A

DEPRESSIONAL AND FLATS WETLANDS

Water Quality Functions - Indicators that the site functions to improve water quality

D 1.0. Does the site have the potential to improve water quality?	
D 1.1. Characteristics of surface water outflows from the wetland: Wetland is a depression or flat depression (QUESTION 7 on key) with no surface water leaving it (no outlet). points = 3 Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet. points = 2 Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing points = 1 Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch. points = 1	2
D 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic *(use NRCS definitions)*. Yes = 4 No = 0	4
D 1.3. Characteristics and distribution of persistent plants (Emergent, Scrub-shrub, and/or Forested Cowardin classes): Wetland has persistent, ungrazed, plants > 95% of area points = 5 Wetland has persistent, ungrazed, plants > ½ of area points = 3 Wetland has persistent, ungrazed plants > $^1/_{10}$ of area points = 1 Wetland has persistent, ungrazed plants < $^1/_{10}$ of area points = 0	5
D 1.4. Characteristics of seasonal ponding or inundation: *This is the area that is ponded for at least 2 months. See description in manual.* Area seasonally ponded is > ½ total area of wetland points = 4 Area seasonally ponded is > ¼ total area of wetland points = 2 Area seasonally ponded is < ¼ total area of wetland points = 0	0
Total for D 1 Add the points in the boxes above	11

Rating of Site Potential If score is: ___ 12-16 = H X 6-11 = M ___ 0-5 = L *Record the rating on the first page*

D 2.0. Does the landscape have the potential to support the water quality function of the site?	
D 2.1. Does the wetland unit receive stormwater discharges? Yes = 1 No = 0	1
D 2.2. Is > 10% of the area within 150 ft of the wetland in land uses that generate pollutants? Yes = 1 No = 0	1
D 2.3. Are there septic systems within 250 ft of the wetland? Yes = 1 No = 0	0
D 2.4. Are there other sources of pollutants coming into the wetland that are not listed in questions D 2.1-D 2.3? Source_____ Yes = 1 No = 0	0
Total for D 2 Add the points in the boxes above	2

Rating of Landscape Potential If score is: ___ 3 or 4 = H X 1 or 2 = M ___ 0 = L *Record the rating on the first page*

D 3.0. Is the water quality improvement provided by the site valuable to society?	
D 3.1. Does the wetland discharge directly (i.e., within 1 mi) to a stream, river, lake, or marine water that is on the 303(d) list? Yes = 1 No = 0	0
D 3.2. Is the wetland in a basin or sub-basin where an aquatic resource is on the 303(d) list? Yes = 1 No = 0	1
D 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality (*answer YES if there is a TMDL for the basin in which the unit is found*)? Yes = 2 No = 0	2
Total for D 3 Add the points in the boxes above	3

Rating of Value If score is: X 2-4 = H ___ 1 = M ___ 0 = L *Record the rating on the first page*

Wetland name or number A

DEPRESSIONAL AND FLATS WETLANDS

Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradation

D 4.0. Does the site have the potential to reduce flooding and erosion?

D 4.1. Characteristics of surface water outflows from the wetland: — **2**

- Wetland is a depression or flat depression with no surface water leaving it (no outlet) — points = 4
- Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet — points = 2
- Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch — points = 1
- Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing — points = 0

D 4.2. Depth of storage during wet periods: *Estimate the height of ponding above the bottom of the outlet. For wetlands with no outlet, measure from the surface of permanent water or if dry, the deepest part.* — **3**

- Marks of ponding are 3 ft or more above the surface or bottom of outlet — points = 7
- Marks of ponding between 2 ft to < 3 ft from surface or bottom of outlet — points = 5
- Marks are at least 0.5 ft to < 2 ft from surface or bottom of outlet — points = 3
- The wetland is a "headwater" wetland — points = 3
- Wetland is flat but has small depressions on the surface that trap water — points = 1
- Marks of ponding less than 0.5 ft (6 in) — points = 0

D 4.3. Contribution of the wetland to storage in the watershed: *Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland unit itself.* — **0**

- The area of the basin is less than 10 times the area of the unit — points = 5
- The area of the basin is 10 to 100 times the area of the unit — points = 3
- The area of the basin is more than 100 times the area of the unit — points = 0
- Entire wetland is in the Flats class — points = 5

Total for D 4 — Add the points in the boxes above — **5**

Rating of Site Potential If score is: ___ 12-16 = H ___ 6-11 = M X 0-5 = L — *Record the rating on the first page*

D 5.0. Does the landscape have the potential to support hydrologic functions of the site?

D 5.1. Does the wetland receive stormwater discharges?	Yes = 1 No = 0	1
D 5.2. Is >10% of the area within 150 ft of the wetland in land uses that generate excess runoff?	Yes = 1 No = 0	1
D 5.3. Is more than 25% of the contributing basin of the wetland covered with intensive human land uses (residential at >1 residence/ac, urban, commercial, agriculture, etc.)?	Yes = 1 No = 0	1
Total for D 5	Add the points in the boxes above	**3**

Rating of Landscape Potential If score is: X 3 = H ___ 1 or 2 = M ___ 0 = L — *Record the rating on the first page*

D 6.0. Are the hydrologic functions provided by the site valuable to society?

D 6.1. The unit is in a landscape that has flooding problems. *Choose the description that best matches conditions around the wetland unit being rated. Do not add points. Choose the highest score if more than one condition is met.* — **1**

The wetland captures surface water that would otherwise flow down-gradient into areas where flooding has damaged human or natural resources (e.g., houses or salmon redds):

- Flooding occurs in a sub-basin that is immediately down-gradient of unit. — points = 2
- Surface flooding problems are in a sub-basin farther down-gradient. — points = (1)

Flooding from groundwater is an issue in the sub-basin. — points = 1

The existing or potential outflow from the wetland is so constrained by human or natural conditions that the water stored by the wetland cannot reach areas that flood. *Explain why* _____ — points = 0

There are no problems with flooding downstream of the wetland. — points = 0

D 6.2. Has the site been identified as important for flood storage or flood conveyance in a regional flood control plan? Yes = 2 No = 0 — **0**

Total for D 6 — Add the points in the boxes above — **1**

Rating of Value If score is: ___ 2-4 = H X 1 = M ___ 0 = L — *Record the rating on the first page*

Wetland name or number A

These questions apply to wetlands of all HGM classes.

HABITAT FUNCTIONS - Indicators that site functions to provide important habitat

H 1.0. Does the site have the potential to provide habitat?

H 1.1. Structure of plant community: *Indicators are Cowardin classes and strata within the Forested class.* Check the Cowardin plant classes in the wetland. *Up to 10 patches may be combined for each class to meet the threshold of ¼ ac or more than 10% of the unit if it is smaller than 2.5 ac. Add the number of structures checked.*

___ Aquatic bed	4 structures or more: points = 4
___ Emergent	3 structures: points = 2
X Scrub-shrub (areas where shrubs have > 30% cover)	2 structures: points = 1
X Forested (areas where trees have > 30% cover)	1 structure: points = 0

If the unit has a Forested class, check if:

X The Forested class has 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) that each cover 20% within the Forested polygon

2

H 1.2. Hydroperiods

Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or ¼ ac to count (*see text for descriptions of hydroperiods*).

___ Permanently flooded or inundated	4 or more types present: points = 3
___ Seasonally flooded or inundated	3 types present: points = 2
X Occasionally flooded or inundated	2 types present: points = 1
X Saturated only	1 type present: points = 0
X Permanently flowing stream or river in, or adjacent to, the wetland	
___ Seasonally flowing stream in, or adjacent to, the wetland	
___ **Lake Fringe wetland**	**2 points**
___ **Freshwater tidal wetland**	**2 points**

2

H 1.3. Richness of plant species

Count the number of plant species in the wetland that cover at least 10 ft^2.

Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. ***Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle***

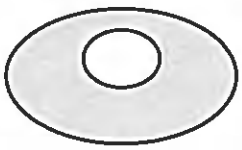
If you counted: > 19 species	points = 2
5 - 19 species	points = 1
< 5 species	points = 0

1

H 1.4. Interspersion of habitats

Decide from the diagrams below whether interspersion among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always high.*

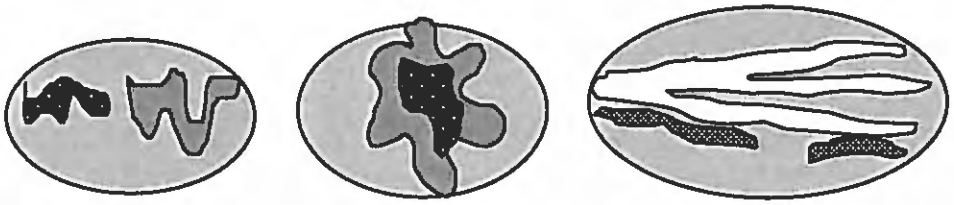
None = 0 points



Low = 1 point

Moderate = 2 points

All three diagrams in this row are **HIGH** = 3points



2

Wetland name or number A

H 1.5. Special habitat features:	
Check the habitat features that are present in the wetland. *The number of checks is the number of points.* X Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). X Standing snags (dbh > 4 in) within the wetland ___ Undercut banks are present for at least 6.6 ft (2 m) **and/or** overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft (10 m) ___ Stable steep banks of fine material that might be used by beaver or muskrat for denning (> 30 degree slope) OR signs of recent beaver activity are present *(cut shrubs or trees that have not yet weathered where wood is exposed)* ___ At least ¼ ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated *(structures for egg-laying by amphibians)* X Invasive plants cover less than 25% of the wetland area in every stratum of plants (*see H 1.1 for list of strata*)	3
Total for H 1 — Add the points in the boxes above	10

Rating of Site Potential If score is: ___ 15-18 = H X 7-14 = M ___ 0-6 = L — *Record the rating on the first page*

H 2.0. Does the landscape have the potential to support the habitat functions of the site?	
H 2.1. Accessible habitat (include *only habitat that directly abuts wetland unit*). *Calculate:* % undisturbed habitat 18 + [(% moderate and low intensity land uses)/2] 1 = 19 % If total accessible habitat is: > 1/3 (33.3%) of 1 km Polygon — points = 3 20-33% of 1 km Polygon — points = 2 10-19% of 1 km Polygon — points = 1 < 10% of 1 km Polygon — points = 0	1
H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. *Calculate:* % undisturbed habitat 24 + [(% moderate and low intensity land uses)/2] 1 = 25 % Undisturbed habitat > 50% of Polygon — points = 3 Undisturbed habitat 10-50% and in 1-3 patches — points = 2 Undisturbed habitat 10-50% and > 3 patches — points = 1 Undisturbed habitat < 10% of 1 km Polygon — points = 0	2
H 2.3. Land use intensity in 1 km Polygon: If > 50% of 1 km Polygon is high intensity land use — points = (- 2) ≤ 50% of 1 km Polygon is high intensity — points = 0	-2
Total for H 2 — Add the points in the boxes above	1

Rating of Landscape Potential If score is: ___ 4-6 = H X 1-3 = M ___ < 1 = L — *Record the rating on the first page*

H 3.0. Is the habitat provided by the site valuable to society?	
H 3.1. Does the site provide habitat for species valued in laws, regulations, or policies? *Choose only the highest score that applies to the wetland being rated.* Site meets ANY of the following criteria: — points = 2 — It has 3 or more priority habitats within 100 m (see next page) — It provides habitat for Threatened or Endangered species (any plant or animal on the state or federal lists) — It is mapped as a location for an individual WDFW priority species — It is a Wetland of High Conservation Value as determined by the Department of Natural Resources — It has been categorized as an important habitat site in a local or regional comprehensive plan, in a Shoreline Master Plan, or in a watershed plan Site has 1 or 2 priority habitats (listed on next page) within 100 m — points = (1) Site does not meet any of the criteria above — points = 0	1

Rating of Value If score is: ___ 2 = H X 1 = M ___ 0 = L — *Record the rating on the first page*

Wetland name or number A

WDFW Priority Habitats

Priority habitats listed by WDFW (see complete descriptions of WDFW priority habitats, and the counties in which they can be found, in: Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. http://wdfw.wa.gov/publications/00165/wdfw00165.pdf or access the list from here: http://wdfw.wa.gov/conservation/phs/list/)

Count how many of the following priority habitats are within 330 ft (100 m) of the wetland unit: ***NOTE:*** *This question is independent of the land use between the wetland unit and the priority habitat.*

— **Aspen Stands:** Pure or mixed stands of aspen greater than 1 ac (0.4 ha).

— **Biodiversity Areas and Corridors:** Areas of habitat that are relatively important to various species of native fish and wildlife (*full descriptions in WDFW PHS report*).

— **Herbaceous Balds:** Variable size patches of grass and forbs on shallow soils over bedrock.

— **Old-growth/Mature forests:** Old-growth west of Cascade crest – Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) > 32 in (81 cm) dbh or > 200 years of age. Mature forests – Stands with average diameters exceeding 21 in (53 cm) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80-200 years old west of the Cascade crest.

— **Oregon White Oak:** Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is important (*full descriptions in WDFW PHS report p. 158 – see web link above*).

X **Riparian:** The area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.

— **Westside Prairies:** Herbaceous, non-forested plant communities that can either take the form of a dry prairie or a wet prairie (*full descriptions in WDFW PHS report p. 161 – see web link above*).

— **Instream:** The combination of physical, biological, and chemical processes and conditions that interact to provide functional life history requirements for instream fish and wildlife resources.

— **Nearshore:** Relatively undisturbed nearshore habitats. These include Coastal Nearshore, Open Coast Nearshore, and Puget Sound Nearshore. (*full descriptions of habitats and the definition of relatively undisturbed are in WDFW report – see web link on previous page).*

— **Caves:** A naturally occurring cavity, recess, void, or system of interconnected passages under the earth in soils, rock, ice, or other geological formations and is large enough to contain a human.

— **Cliffs:** Greater than 25 ft (7.6 m) high and occurring below 5000 ft elevation.

— **Talus:** Homogenous areas of rock rubble ranging in average size 0.5 - 6.5 ft (0.15 - 2.0 m), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.

— **Snags and Logs:** Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 20 in (51 cm) in western Washington and are > 6.5 ft (2 m) in height. Priority logs are > 12 in (30 cm) in diameter at the largest end, and > 20 ft (6 m) long.

Note: All vegetated wetlands are by definition a priority habitat but are not included in this list because they are addressed elsewhere.

Wetland name or number B

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Algona - Wetland B Date of site visit: 9-10-15

Rated by Paul Hamidi Trained by Ecology? X Yes ___ No Date of training 2013

HGM Class used for rating Depressional **Wetland has multiple HGM classes?** ___ Y X N

NOTE: Form is not complete without the figures requested *(figures can be combined).*

Source of base aerial photo/map ESRI Basemap Imagery

OVERALL WETLAND CATEGORY III (based on functions ✓ or special characteristics ___)

1. Category of wetland based on FUNCTIONS

___ **Category I** – Total score = 23 - 27

___ **Category II** – Total score = 20 - 22

X **Category III** – Total score = 16 - 19

___ **Category IV** – Total score = 9 - 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
	Circle the appropriate ratings			
Site Potential	H (M) L	H (M) L	H M (L)	
Landscape Potential	H (M) L	(H) M L	H (M) L	
Value	(H) M L	H (M) L	H (M) L	TOTAL
Score Based on Ratings	7	7	5	19

Score for each function based on three ratings *(order of ratings is not important)*

9 = H,H,H
8 = H,H,M
7 = H,H,L
7 = H,M,M
6 = H,M,L
6 = M,M,M
5 = H,L,L
5 = M,M,L
4 = M,L,L
3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	I II
Wetland of High Conservation Value	I
Bog	I
Mature Forest	I
Old Growth Forest	I
Coastal Lagoon	I II
Interdunal	I II III IV
None of the above	✓

Wetland name or number B

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	A
Hydroperiods	D 1.4, H 1.2	B
Location of outlet *(can be added to map of hydroperiods)*	D 1.1, D 4.1	B
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	D 2.2, D 5.2	A
Map of the contributing basin	D 4.3, D 5.3	C
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	D
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	E
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	E

Riverine Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Ponded depressions	R 1.1	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	R 2.4	
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	
Width of unit vs. width of stream *(can be added to another figure)*	R 4.1	
Map of the contributing basin	R 2.2, R 2.3, R 5.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	

Lake Fringe Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	L 1.1, L 4.1, H 1.1, H 1.4	
Plant cover of trees, shrubs, and herbaceous plants	L 1.2	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	L 2.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	L 3.1, L 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	L 3.3	

Slope Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Plant cover of **dense** trees, shrubs, and herbaceous plants	S 1.3	
Plant cover of **dense, rigid** trees, shrubs, and herbaceous plants *(can be added to figure above)*	S 4.1	
Boundary of 150 ft buffer (can be added to another figure)	S 2.1, S 5.1	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	

Wetland name or number B

HGM Classification of Wetlands in Western Washington

For questions 1-7, the criteria described must apply to the entire unit being rated.

If the hydrologic criteria listed in each question do not apply to the entire unit being rated, you probably have a unit with multiple HGM classes. In this case, identify which hydrologic criteria in questions 1-7 apply, and go to Question 8.

1. Are the water levels in the entire unit usually controlled by tides except during floods?

   (NO) go to 2 **YES** – the wetland class is **Tidal Fringe** – go to 1.1

   1.1 Is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

   (NO) **Saltwater Tidal Fringe (Estuarine)** **YES – Freshwater Tidal Fringe**
   *If your wetland can be classified as a Freshwater Tidal Fringe use the forms for **Riverine** wetlands. If it is Saltwater Tidal Fringe it is an **Estuarine** wetland and is not scored. This method **cannot** be used to score functions for estuarine wetlands.*

2. The entire wetland unit is flat and precipitation is the only source (>90%) of water to it. Groundwater and surface water runoff are NOT sources of water to the unit.

   (NO) go to 3 **YES** – The wetland class is **Flats**
   *If your wetland can be classified as a Flats wetland, use the form for **Depressional** wetlands.*

3. Does the entire wetland unit **meet all** of the following criteria?
   ___The vegetated part of the wetland is on the shores of a body of permanent open water (without any plants on the surface at any time of the year) at least 20 ac (8 ha) in size;
   ___At least 30% of the open water area is deeper than 6.6 ft (2 m).

   (NO) go to 4 **YES** – The wetland class is **Lake Fringe** (Lacustrine Fringe)

4. Does the entire wetland unit **meet all** of the following criteria?
   ___The wetland is on a slope (*slope can be very gradual*),
   ___The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks,
   ___The water leaves the wetland **without being impounded**.

   (NO) go to 5 **YES** – The wetland class is **Slope**

   NOTE: Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 ft diameter and less than 1 ft deep).

5. Does the entire wetland unit **meet all** of the following criteria?
   ___The unit is in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river,
   ___The overbank flooding occurs at least once every 2 years.

Wetland name or number B

NO → go to 6 **YES** – The wetland class is **Riverine**

NOTE: The Riverine unit can contain depressions that are filled with water when the river is not flooding

6. Is the entire wetland unit in a topographic depression in which water ponds, or is saturated to the surface, at some time during the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

NO – go to 7 YES → The wetland class is **Depressional**

7. Is the entire wetland unit located in a very flat area with no obvious depression and no overbank flooding? The unit does not pond surface water more than a few inches. The unit seems to be maintained by high groundwater in the area. The wetland may be ditched, but has no obvious natural outlet.

NO – go to 8 **YES** – The wetland class is **Depressional**

8. Your wetland unit seems to be difficult to classify and probably contains several different HGM classes. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a Depressional wetland has a zone of flooding along its sides. GO BACK AND IDENTIFY WHICH OF THE HYDROLOGIC REGIMES DESCRIBED IN QUESTIONS 1-7 APPLY TO DIFFERENT AREAS IN THE UNIT (make a rough sketch to help you decide). Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within the wetland unit being scored.

NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland unit being rated. If the area of the HGM class listed in column 2 is less than 10% of the unit; classify the wetland using the class that represents more than 90% of the total area.

HGM classes within the wetland unit being rated	HGM class to use in rating
Slope + Riverine	Riverine
Slope + Depressional	Depressional
Slope + Lake Fringe	Lake Fringe
Depressional + Riverine along stream within boundary of depression	Depressional
Depressional + Lake Fringe	Depressional
Riverine + Lake Fringe	Riverine
Salt Water Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE

*If you are still unable to determine which of the above criteria apply to your wetland, or if you have **more than 2 HGM classes** within a wetland boundary, classify the wetland as Depressional for the rating.*

Wetland name or number B

DEPRESSIONAL AND FLATS WETLANDS

Water Quality Functions - Indicators that the site functions to improve water quality

D 1.0. Does the site have the potential to improve water quality?	
D 1.1. Characteristics of surface water outflows from the wetland: Wetland is a depression or flat depression (QUESTION 7 on key) with no surface water leaving it (no outlet). points = 3 Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet. points = 2 Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing points = 1 Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch. points = 1	3
D 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic *(use NRCS definitions)*. Yes = 4 No = 0	0
D 1.3. Characteristics and distribution of persistent plants (Emergent, Scrub-shrub, and/or Forested Cowardin classes): Wetland has persistent, ungrazed, plants > 95% of area points = 5 Wetland has persistent, ungrazed, plants > ½ of area points = 3 Wetland has persistent, ungrazed plants > $^1/_{10}$ of area points = 1 Wetland has persistent, ungrazed plants < $^1/_{10}$ of area points = 0	3
D 1.4. Characteristics of seasonal ponding or inundation: *This is the area that is ponded for at least 2 months. See description in manual.* Area seasonally ponded is > ½ total area of wetland points = 4 Area seasonally ponded is > ¼ total area of wetland points = 2 Area seasonally ponded is < ¼ total area of wetland points = 0	4
Total for D 1 Add the points in the boxes above	10

Rating of Site Potential If score is: ___ 12-16 = H X 6-11 = M ___ 0-5 = L *Record the rating on the first page*

D 2.0. Does the landscape have the potential to support the water quality function of the site?	
D 2.1. Does the wetland unit receive stormwater discharges? Yes = 1 No = 0	1
D 2.2. Is > 10% of the area within 150 ft of the wetland in land uses that generate pollutants? Yes = 1 No = 0	1
D 2.3. Are there septic systems within 250 ft of the wetland? Yes = 1 No = 0	0
D 2.4. Are there other sources of pollutants coming into the wetland that are not listed in questions D 2.1-D 2.3? Source_____ Yes = 1 No = 0	0
Total for D 2 Add the points in the boxes above	2

Rating of Landscape Potential If score is: ___ 3 or 4 = H X 1 or 2 = M ___ 0 = L *Record the rating on the first page*

D 3.0. Is the water quality improvement provided by the site valuable to society?	
D 3.1. Does the wetland discharge directly (i.e., within 1 mi) to a stream, river, lake, or marine water that is on the 303(d) list? Yes = 1 No = 0	0
D 3.2. Is the wetland in a basin or sub-basin where an aquatic resource is on the 303(d) list? Yes = 1 No = 0	1
D 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality (*answer YES if there is a TMDL for the basin in which the unit is found*)? Yes = 2 No = 0	2
Total for D 3 Add the points in the boxes above	3

Rating of Value If score is: X 2-4 = H ___ 1 = M ___ 0 = L *Record the rating on the first page*

Wetland name or number B

DEPRESSIONAL AND FLATS WETLANDS

Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradation

D 4.0. Does the site have the potential to reduce flooding and erosion?

D 4.1. Characteristics of surface water outflows from the wetland:		4
Wetland is a depression or flat depression with no surface water leaving it (no outlet)	points = 4	
Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet	points = 2	
Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch	points = 1	
Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing	points = 0	
D 4.2. Depth of storage during wet periods: *Estimate the height of ponding above the bottom of the outlet. For wetlands with no outlet, measure from the surface of permanent water or if dry, the deepest part.*		5
Marks of ponding are 3 ft or more above the surface or bottom of outlet	points = 7	
Marks of ponding between 2 ft to < 3 ft from surface or bottom of outlet	points = 5	
Marks are at least 0.5 ft to < 2 ft from surface or bottom of outlet	points = 3	
The wetland is a "headwater" wetland	points = 3	
Wetland is flat but has small depressions on the surface that trap water	points = 1	
Marks of ponding less than 0.5 ft (6 in)	points = 0	
D 4.3. Contribution of the wetland to storage in the watershed: *Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland unit itself.*		0
The area of the basin is less than 10 times the area of the unit	points = 5	
The area of the basin is 10 to 100 times the area of the unit	points = 3	
The area of the basin is more than 100 times the area of the unit	points = 0	
Entire wetland is in the Flats class	points = 5	
Total for D 4	Add the points in the boxes above	9

Rating of Site Potential If score is: ___ 12-16 = H X 6-11 = M ___ 0-5 = L *Record the rating on the first page*

D 5.0. Does the landscape have the potential to support hydrologic functions of the site?

D 5.1. Does the wetland receive stormwater discharges?	Yes = 1 No = 0	1
D 5.2. Is >10% of the area within 150 ft of the wetland in land uses that generate excess runoff?	Yes = 1 No = 0	1
D 5.3. Is more than 25% of the contributing basin of the wetland covered with intensive human land uses (residential at >1 residence/ac, urban, commercial, agriculture, etc.)?	Yes = 1 No = 0	1
Total for D 5	Add the points in the boxes above	3

Rating of Landscape Potential If score is: X 3 = H ___ 1 or 2 = M ___ 0 = L *Record the rating on the first page*

D 6.0. Are the hydrologic functions provided by the site valuable to society?

D 6.1. The unit is in a landscape that has flooding problems. *Choose the description that best matches conditions around the wetland unit being rated. Do not add points. Choose the highest score if more than one condition is met.*		1
The wetland captures surface water that would otherwise flow down-gradient into areas where flooding has damaged human or natural resources (e.g., houses or salmon redds):		
• Flooding occurs in a sub-basin that is immediately down-gradient of unit.	points = 2	
• Surface flooding problems are in a sub-basin farther down-gradient.	points = (1)	
Flooding from groundwater is an issue in the sub-basin.	points = 1	
The existing or potential outflow from the wetland is so constrained by human or natural conditions that the water stored by the wetland cannot reach areas that flood. *Explain why* _____	points = 0	
There are no problems with flooding downstream of the wetland.	points = 0	
D 6.2. Has the site been identified as important for flood storage or flood conveyance in a regional flood control plan?	Yes = 2 No = 0	0
Total for D 6	Add the points in the boxes above	1

Rating of Value If score is: ___ 2-4 = H X 1 = M ___ 0 = L *Record the rating on the first page*

Wetland name or number B

These questions apply to wetlands of all HGM classes.

HABITAT FUNCTIONS - Indicators that site functions to provide important habitat

H 1.0. Does the site have the potential to provide habitat?

H 1.1. Structure of plant community: *Indicators are Cowardin classes and strata within the Forested class.* Check the Cowardin plant classes in the wetland. *Up to 10 patches may be combined for each class to meet the threshold of ¼ ac or more than 10% of the unit if it is smaller than 2.5 ac. Add the number of structures checked.*

___ Aquatic bed	4 structures or more: points = 4
_X_ Emergent	3 structures: points = 2
_X_ Scrub-shrub (areas where shrubs have > 30% cover)	2 structures: points = 1
___ Forested (areas where trees have > 30% cover)	1 structure: points = 0

If the unit has a Forested class, check if:

___ The Forested class has 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) that each cover 20% within the Forested polygon

1

H 1.2. Hydroperiods

Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or ¼ ac to count (*see text for descriptions of hydroperiods*).

_X_ Permanently flooded or inundated	4 or more types present: points = 3
_X_ Seasonally flooded or inundated	3 types present: points = 2
___ Occasionally flooded or inundated	2 types present: points = 1
_X_ Saturated only	1 type present: points = 0
___ Permanently flowing stream or river in, or adjacent to, the wetland	
___ Seasonally flowing stream in, or adjacent to, the wetland	
___ **Lake Fringe wetland**	**2 points**
___ **Freshwater tidal wetland**	**2 points**

2

H 1.3. Richness of plant species

Count the number of plant species in the wetland that cover at least 10 ft^2.

Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. ***Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle***

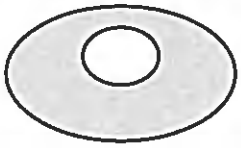
If you counted: > 19 species	points = 2
5 - 19 species	points = 1
< 5 species	points = 0

1

H 1.4. Interspersion of habitats

Decide from the diagrams below whether interspersion among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always high.*

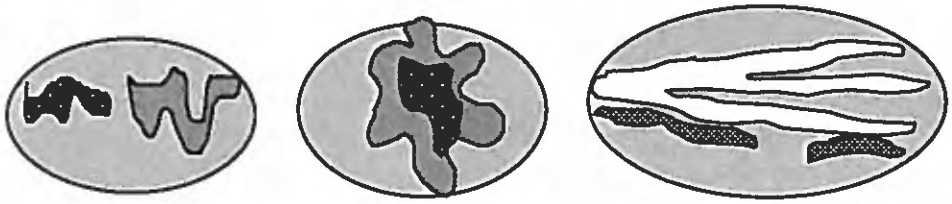
None = 0 points



Low = 1 point

Moderate = 2 points

All three diagrams in this row are **HIGH** = 3points



1

Wetland name or number B

H 1.5. Special habitat features: Check the habitat features that are present in the wetland. *The number of checks is the number of points.* X Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). ____Standing snags (dbh > 4 in) within the wetland ____Undercut banks are present for at least 6.6 ft (2 m) **and/or** overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft (10 m) ____Stable steep banks of fine material that might be used by beaver or muskrat for denning (> 30 degree slope) OR signs of recent beaver activity are present *(cut shrubs or trees that have not yet weathered where wood is exposed)* ____At least ¼ ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated *(structures for egg-laying by amphibians)* ____Invasive plants cover less than 25% of the wetland area in every stratum of plants (*see H 1.1 for list of strata*)	1
Total for H 1 Add the points in the boxes above	6

Rating of Site Potential If score is:___15-18 = H ___7-14 = M X 0-6 = L *Record the rating on the first page*

H 2.0. Does the landscape have the potential to support the habitat functions of the site?	
H 2.1. Accessible habitat (include *only habitat that directly abuts wetland unit*). *Calculate:* % undisturbed habitat 18 + [(% moderate and low intensity land uses)/2] 1 = 19 % If total accessible habitat is: > 1/3 (33.3%) of 1 km Polygon points = 3 20-33% of 1 km Polygon points = 2 10-19% of 1 km Polygon points = 1 < 10% of 1 km Polygon points = 0	1
H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. *Calculate:* % undisturbed habitat 24 + [(% moderate and low intensity land uses)/2] 1 = 25 % Undisturbed habitat > 50% of Polygon points = 3 Undisturbed habitat 10-50% and in 1-3 patches points = 2 Undisturbed habitat 10-50% and > 3 patches points = 1 Undisturbed habitat < 10% of 1 km Polygon points = 0	2
H 2.3. Land use intensity in 1 km Polygon: If > 50% of 1 km Polygon is high intensity land use points = (- 2) ≤ 50% of 1 km Polygon is high intensity points = 0	-2
Total for H 2 Add the points in the boxes above	2

Rating of Landscape Potential If score is:___4-6 = H X 1-3 = M ___< 1 = L *Record the rating on the first page*

H 3.0. Is the habitat provided by the site valuable to society?	
H 3.1. Does the site provide habitat for species valued in laws, regulations, or policies? *Choose only the highest score that applies to the wetland being rated.* Site meets ANY of the following criteria: points = 2 — It has 3 or more priority habitats within 100 m (see next page) — It provides habitat for Threatened or Endangered species (any plant or animal on the state or federal lists) — It is mapped as a location for an individual WDFW priority species — It is a Wetland of High Conservation Value as determined by the Department of Natural Resources — It has been categorized as an important habitat site in a local or regional comprehensive plan, in a Shoreline Master Plan, or in a watershed plan Site has 1 or 2 priority habitats (listed on next page) within 100 m points = 1 Site does not meet any of the criteria above points = 0	1

Rating of Value If score is:___2 = H X 1 = M ___0 = L *Record the rating on the first page*

Wetland name or number AB

WDFW Priority Habitats

Priority habitats listed by WDFW (see complete descriptions of WDFW priority habitats, and the counties in which they can be found, in: Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. http://wdfw.wa.gov/publications/00165/wdfw00165.pdf or access the list from here: http://wdfw.wa.gov/conservation/phs/list/)

Count how many of the following priority habitats are within 330 ft (100 m) of the wetland unit: ***NOTE:*** *This question is independent of the land use between the wetland unit and the priority habitat.*

— **Aspen Stands:** Pure or mixed stands of aspen greater than 1 ac (0.4 ha).

— **Biodiversity Areas and Corridors:** Areas of habitat that are relatively important to various species of native fish and wildlife (*full descriptions in WDFW PHS report*).

— **Herbaceous Balds:** Variable size patches of grass and forbs on shallow soils over bedrock.

— **Old-growth/Mature forests:** Old-growth west of Cascade crest – Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) > 32 in (81 cm) dbh or > 200 years of age. Mature forests – Stands with average diameters exceeding 21 in (53 cm) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80-200 years old west of the Cascade crest.

— **Oregon White Oak:** Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is important (*full descriptions in WDFW PHS report p. 158 – see web link above*).

✓ **Riparian:** The area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.

— **Westside Prairies:** Herbaceous, non-forested plant communities that can either take the form of a dry prairie or a wet prairie (*full descriptions in WDFW PHS report p. 161 – see web link above*).

— **Instream:** The combination of physical, biological, and chemical processes and conditions that interact to provide functional life history requirements for instream fish and wildlife resources.

— **Nearshore:** Relatively undisturbed nearshore habitats. These include Coastal Nearshore, Open Coast Nearshore, and Puget Sound Nearshore. (*full descriptions of habitats and the definition of relatively undisturbed are in WDFW report – see web link on previous page).*

— **Caves:** A naturally occurring cavity, recess, void, or system of interconnected passages under the earth in soils, rock, ice, or other geological formations and is large enough to contain a human.

— **Cliffs:** Greater than 25 ft (7.6 m) high and occurring below 5000 ft elevation.

— **Talus:** Homogenous areas of rock rubble ranging in average size 0.5 - 6.5 ft (0.15 - 2.0 m), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.

— **Snags and Logs:** Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 20 in (51 cm) in western Washington and are > 6.5 ft (2 m) in height. Priority logs are > 12 in (30 cm) in diameter at the largest end, and > 20 ft (6 m) long.

Note: All vegetated wetlands are by definition a priority habitat but are not included in this list because they are addressed elsewhere.

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Date: 9/22/2015 | joel_hancock

Figure A

Cowardin Classes

Wetlands A and B
King County SCRTS

C:\GIS\Projects\KingCounty\mxd\wetlandratings\WetlandsA&B_HydroperiodsOutlets.mxd
Date: 9/22/2015 | joel_hancock

Figure B

Hydroperiods

Wetlands A and B
King County SCRTS

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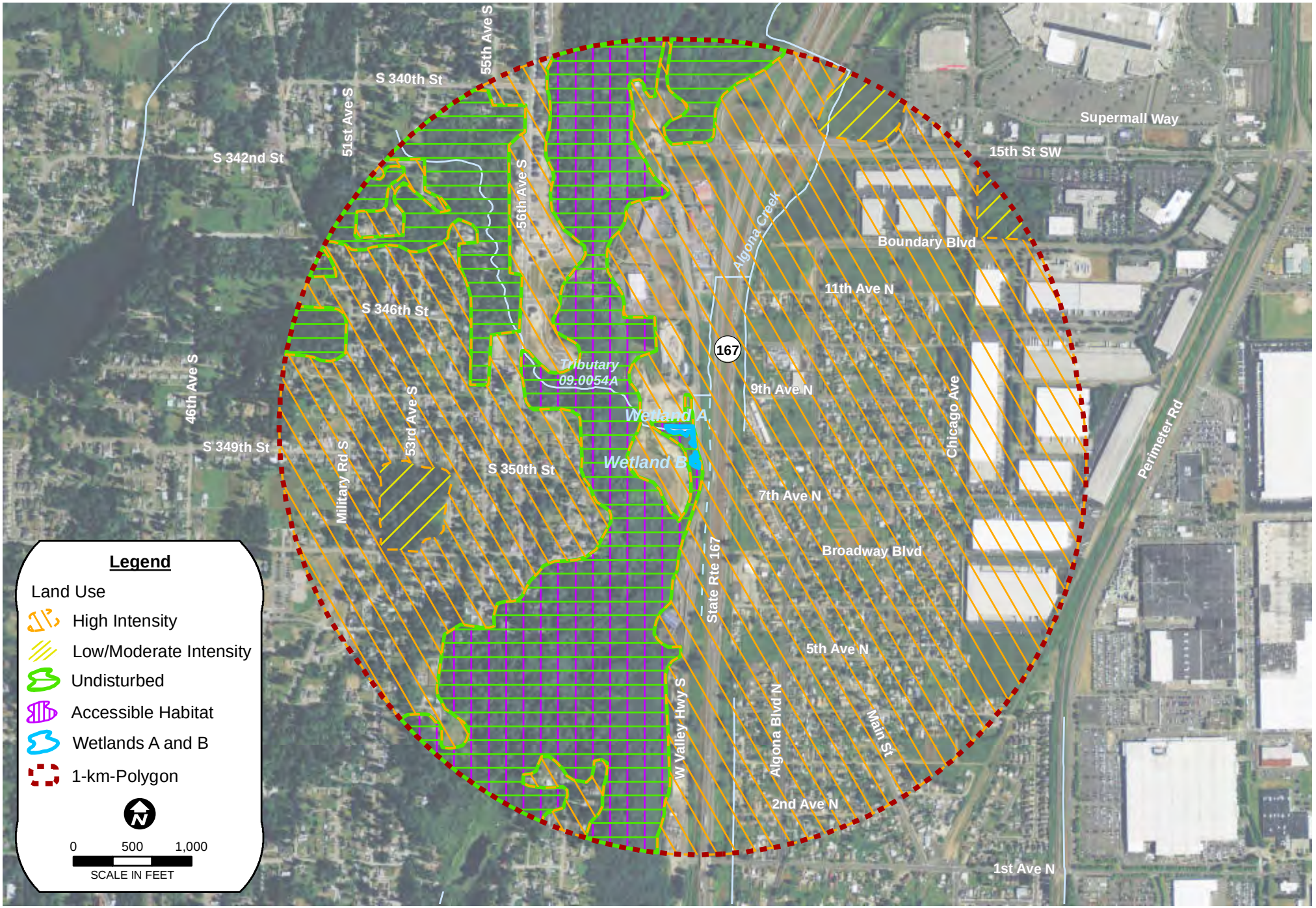
Date: 9/22/2015 | joel_hancock

Figure C

Contributing Basins

Wetlands A and B
King County SCRTS



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Date: 9/18/2015 | joel_hancock

Figure D

Accessible and Undisturbed Habitat in 1 KM Polygon

Wetlands A and B
King County SCRTS

C:\GIS\Projects\KingCounty\mxd\wetlandratings\WetlandsA&B_303d_WRIA_TMDL.mxd
Date: 9/18/2015 | joel_hancock

Figure E

303 (d) Waters, WRIAs, and TMDLs

Wetlands A and B
King County SCRTS

Wetland name or number C

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Algona - Wetland C Date of site visit: 9-10-15

Rated by Paul Hamidi Trained by Ecology? X Yes ___No Date of training 2013

HGM Class used for rating Depressional Wetland has multiple HGM classes? ___Y X N

NOTE: Form is not complete without the figures requested *(figures can be combined).*

Source of base aerial photo/map ESRI Basemap Imagery

OVERALL WETLAND CATEGORY III (based on functions ✓ or special characteristics ___)

1. Category of wetland based on FUNCTIONS

___**Category I** – Total score = 23 - 27

___**Category II** – Total score = 20 - 22

X **Category III** – Total score = 16 - 19

___**Category IV** – Total score = 9 - 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
	Circle the appropriate ratings			
Site Potential	(H) M L	H (M) L	H M (L)	
Landscape Potential	H (M) L	H (M) L	H M (L)	
Value	(H) M L	H (M) L	H M (L)	TOTAL
Score Based on Ratings	8	6	3	17

Score for each function based on three ratings *(order of ratings is not important)*

9 = H,H,H
8 = H,H,M
7 = H,H,L
7 = H,M,M
6 = H,M,L
6 = M,M,M
5 = H,L,L
5 = M,M,L
4 = M,L,L
3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	I II
Wetland of High Conservation Value	I
Bog	I
Mature Forest	I
Old Growth Forest	I
Coastal Lagoon	I II
Interdunal	I II III IV
None of the above	✓

Wetland name or number C

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	A
Hydroperiods	D 1.4, H 1.2	B
Location of outlet *(can be added to map of hydroperiods)*	D 1.1, D 4.1	B
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	D 2.2, D 5.2	A
Map of the contributing basin	D 4.3, D 5.3	C
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	D
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	E
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	E

Riverine Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Ponded depressions	R 1.1	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	R 2.4	
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	
Width of unit vs. width of stream *(can be added to another figure)*	R 4.1	
Map of the contributing basin	R 2.2, R 2.3, R 5.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	

Lake Fringe Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	L 1.1, L 4.1, H 1.1, H 1.4	
Plant cover of trees, shrubs, and herbaceous plants	L 1.2	
Boundary of area within 150 ft of the wetland *(can be added to another figure)*	L 2.2	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	L 3.1, L 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	L 3.3	

Slope Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	
Hydroperiods	H 1.2	
Plant cover of **dense** trees, shrubs, and herbaceous plants	S 1.3	
Plant cover of **dense, rigid** trees, shrubs, and herbaceous plants *(can be added to figure above)*	S 4.1	
Boundary of 150 ft buffer (can be added to another figure)	S 2.1, S 5.1	
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	

Wetland name or number C

HGM Classification of Wetlands in Western Washington

For questions 1-7, the criteria described must apply to the entire unit being rated.

If the hydrologic criteria listed in each question do not apply to the entire unit being rated, you probably have a unit with multiple HGM classes. In this case, identify which hydrologic criteria in questions 1-7 apply, and go to Question 8.

1. Are the water levels in the entire unit usually controlled by tides except during floods?

   (NO) go to 2 **YES** – the wetland class is **Tidal Fringe** – go to 1.1

   1.1 Is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

   NO – Saltwater Tidal Fringe (Estuarine) **YES – Freshwater Tidal Fringe**

   *If your wetland can be classified as a Freshwater Tidal Fringe use the forms for **Riverine** wetlands. If it is Saltwater Tidal Fringe it is an **Estuarine** wetland and is not scored. This method **cannot** be used to score functions for estuarine wetlands.*

2. The entire wetland unit is flat and precipitation is the only source (>90%) of water to it. Groundwater and surface water runoff are NOT sources of water to the unit.

   (NO) go to 3 **YES** – The wetland class is **Flats**

   *If your wetland can be classified as a Flats wetland, use the form for **Depressional** wetlands.*

3. Does the entire wetland unit **meet all** of the following criteria?
   ___The vegetated part of the wetland is on the shores of a body of permanent open water (without any plants on the surface at any time of the year) at least 20 ac (8 ha) in size;
   ___At least 30% of the open water area is deeper than 6.6 ft (2 m).

   (NO) go to 4 **YES** – The wetland class is **Lake Fringe** (Lacustrine Fringe)

4. Does the entire wetland unit **meet all** of the following criteria?
   ___The wetland is on a slope (*slope can be very gradual*),
   ___The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks,
   ___The water leaves the wetland **without being impounded**.

   (NO) go to 5 **YES** – The wetland class is **Slope**

   NOTE: Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 ft diameter and less than 1 ft deep).

5. Does the entire wetland unit **meet all** of the following criteria?
   ___The unit is in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river,
   ___The overbank flooding occurs at least once every 2 years.

Wetland name or number C

NO – go to 6 **YES** – The wetland class is **Riverine**

NOTE: The Riverine unit can contain depressions that are filled with water when the river is not flooding

6. Is the entire wetland unit in a topographic depression in which water ponds, or is saturated to the surface, at some time during the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

NO – go to 7 **YES** – The wetland class is **Depressional**

7. Is the entire wetland unit located in a very flat area with no obvious depression and no overbank flooding? The unit does not pond surface water more than a few inches. The unit seems to be maintained by high groundwater in the area. The wetland may be ditched, but has no obvious natural outlet.

NO – go to 8 **YES** – The wetland class is **Depressional**

8. Your wetland unit seems to be difficult to classify and probably contains several different HGM classes. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a Depressional wetland has a zone of flooding along its sides. GO BACK AND IDENTIFY WHICH OF THE HYDROLOGIC REGIMES DESCRIBED IN QUESTIONS 1-7 APPLY TO DIFFERENT AREAS IN THE UNIT (make a rough sketch to help you decide). Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within the wetland unit being scored.

NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland unit being rated. If the area of the HGM class listed in column 2 is less than 10% of the unit; classify the wetland using the class that represents more than 90% of the total area.

HGM classes within the wetland unit being rated	HGM class to use in rating
Slope + Riverine	Riverine
Slope + Depressional	Depressional
Slope + Lake Fringe	Lake Fringe
Depressional + Riverine along stream within boundary of depression	Depressional
Depressional + Lake Fringe	Depressional
Riverine + Lake Fringe	Riverine
Salt Water Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE

*If you are still unable to determine which of the above criteria apply to your wetland, or if you have **more than 2 HGM classes** within a wetland boundary, classify the wetland as Depressional for the rating.*

Wetland name or number C

DEPRESSIONAL AND FLATS WETLANDS

Water Quality Functions - Indicators that the site functions to improve water quality

D 1.0. Does the site have the potential to improve water quality?

D 1.1. Characteristics of surface water outflows from the wetland: Wetland is a depression or flat depression (QUESTION 7 on key) with no surface water leaving it (no outlet). points = 3 Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet. points = 2 Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing points = (1) Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch. points = 1	1
D 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic *(use NRCS definitions)*. Yes = 4 No = 0	4
D 1.3. Characteristics and distribution of persistent plants (Emergent, Scrub-shrub, and/or Forested Cowardin classes): Wetland has persistent, ungrazed, plants > 95% of area points = 5 Wetland has persistent, ungrazed, plants > ½ of area points = 3 Wetland has persistent, ungrazed plants > $^1/_{10}$ of area points = 1 Wetland has persistent, ungrazed plants < $^1/_{10}$ of area points = 0	5
D 1.4. Characteristics of seasonal ponding or inundation: *This is the area that is ponded for at least 2 months. See description in manual.* Area seasonally ponded is > ½ total area of wetland points = 4 Area seasonally ponded is > ¼ total area of wetland points = 2 Area seasonally ponded is < ¼ total area of wetland points = 0	4
Total for D 1 Add the points in the boxes above	14

Rating of Site Potential If score is: X **12-16 = H** ___ **6-11 = M** ___ **0-5 = L** *Record the rating on the first page*

D 2.0. Does the landscape have the potential to support the water quality function of the site?

D 2.1. Does the wetland unit receive stormwater discharges? Yes = 1 No = 0	1
D 2.2. Is > 10% of the area within 150 ft of the wetland in land uses that generate pollutants? Yes = 1 No = 0	1
D 2.3. Are there septic systems within 250 ft of the wetland? Yes = 1 No = 0	0
D 2.4. Are there other sources of pollutants coming into the wetland that are not listed in questions D 2.1-D 2.3? Source_____ Yes = 1 No = 0	0
Total for D 2 Add the points in the boxes above	2

Rating of Landscape Potential If score is: ___ **3 or 4 = H** X **1 or 2 = M** ___ **0 = L** *Record the rating on the first page*

D 3.0. Is the water quality improvement provided by the site valuable to society?

D 3.1. Does the wetland discharge directly (i.e., within 1 mi) to a stream, river, lake, or marine water that is on the 303(d) list? Yes = 1 No = 0	0
D 3.2. Is the wetland in a basin or sub-basin where an aquatic resource is on the 303(d) list? Yes = 1 No = 0	1
D 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality (*answer YES if there is a TMDL for the basin in which the unit is found*)? Yes = 2 No = 0	2
Total for D 3 Add the points in the boxes above	3

Rating of Value If score is: X **2-4 = H** ___ **1 = M** ___ **0 = L** *Record the rating on the first page*

Wetland name or number C

DEPRESSIONAL AND FLATS WETLANDS

Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradation

D 4.0. Does the site have the potential to reduce flooding and erosion?

D 4.1. Characteristics of surface water outflows from the wetland: — **0**

- Wetland is a depression or flat depression with no surface water leaving it (no outlet) — points = 4
- Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet — points = 2
- Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch — points = 1
- Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing — points = 0

D 4.2. Depth of storage during wet periods: *Estimate the height of ponding above the bottom of the outlet. For wetlands with no outlet, measure from the surface of permanent water or if dry, the deepest part.* — **5**

- Marks of ponding are 3 ft or more above the surface or bottom of outlet — points = 7
- Marks of ponding between 2 ft to < 3 ft from surface or bottom of outlet — points = 5
- Marks are at least 0.5 ft to < 2 ft from surface or bottom of outlet — points = 3
- The wetland is a "headwater" wetland — points = 3
- Wetland is flat but has small depressions on the surface that trap water — points = 1
- Marks of ponding less than 0.5 ft (6 in) — points = 0

D 4.3. Contribution of the wetland to storage in the watershed: *Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland unit itself.* — **3**

- The area of the basin is less than 10 times the area of the unit — points = 5
- The area of the basin is 10 to 100 times the area of the unit — points = 3
- The area of the basin is more than 100 times the area of the unit — points = 0
- Entire wetland is in the Flats class — points = 5

Total for D 4 — Add the points in the boxes above — **8**

Rating of Site Potential If score is: ___ 12-16 = H ☒ 6-11 = M ___ 0-5 = L — *Record the rating on the first page*

D 5.0. Does the landscape have the potential to support hydrologic functions of the site?

D 5.1. Does the wetland receive stormwater discharges?	Yes = 1 No = 0	1
D 5.2. Is >10% of the area within 150 ft of the wetland in land uses that generate excess runoff?	Yes = 1 No = 0	1
D 5.3. Is more than 25% of the contributing basin of the wetland covered with intensive human land uses (residential at >1 residence/ac, urban, commercial, agriculture, etc.)?	Yes = 1 No = 0	0
Total for D 5	Add the points in the boxes above	2

Rating of Landscape Potential If score is: ___ 3 = H ☒ 1 or 2 = M ___ 0 = L — *Record the rating on the first page*

D 6.0. Are the hydrologic functions provided by the site valuable to society?

D 6.1. The unit is in a landscape that has flooding problems. *Choose the description that best matches conditions around the wetland unit being rated. Do not add points. Choose the highest score if more than one condition is met.* — **1**

The wetland captures surface water that would otherwise flow down-gradient into areas where flooding has damaged human or natural resources (e.g., houses or salmon redds):

- Flooding occurs in a sub-basin that is immediately down-gradient of unit. — points = 2
- Surface flooding problems are in a sub-basin farther down-gradient. — points = (1)

Flooding from groundwater is an issue in the sub-basin. — points = 1

The existing or potential outflow from the wetland is so constrained by human or natural conditions that the water stored by the wetland cannot reach areas that flood. *Explain why* _____ — points = 0

There are no problems with flooding downstream of the wetland. — points = 0

D 6.2. Has the site been identified as important for flood storage or flood conveyance in a regional flood control plan? Yes = 2 No = 0 — **0**

Total for D 6 — Add the points in the boxes above — **1**

Rating of Value If score is: ___ 2-4 = H ☒ 1 = M ___ 0 = L — *Record the rating on the first page*

Wetland name or number C

These questions apply to wetlands of all HGM classes.

HABITAT FUNCTIONS - Indicators that site functions to provide important habitat

H 1.0. Does the site have the potential to provide habitat?

H 1.1. Structure of plant community: *Indicators are Cowardin classes and strata within the Forested class.* Check the Cowardin plant classes in the wetland. *Up to 10 patches may be combined for each class to meet the threshold of ¼ ac or more than 10% of the unit if it is smaller than 2.5 ac. Add the number of structures checked.*

____ Aquatic bed	4 structures or more: points = 4
_X_ Emergent	3 structures: points = 2
____ Scrub-shrub (areas where shrubs have > 30% cover)	2 structures: points = 1
____ Forested (areas where trees have > 30% cover)	1 structure: points = 0

If the unit has a Forested class, check if:

____ The Forested class has 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) that each cover 20% within the Forested polygon

H 1.2. Hydroperiods

Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or ¼ ac to count (*see text for descriptions of hydroperiods*).

____ Permanently flooded or inundated	4 or more types present: points = 3
_X_ Seasonally flooded or inundated	3 types present: points = 2
_X_ Occasionally flooded or inundated	2 types present: points = 1
_X_ Saturated only	1 type present: points = 0
____ Permanently flowing stream or river in, or adjacent to, the wetland	
____ Seasonally flowing stream in, or adjacent to, the wetland	
____ **Lake Fringe wetland**	**2 points**
____ **Freshwater tidal wetland**	**2 points**

H 1.3. Richness of plant species

Count the number of plant species in the wetland that cover at least 10 ft^2.

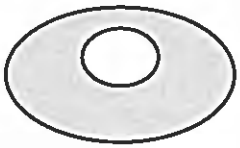
Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. ***Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle***

If you counted: > 19 species	points = 2
5 - 19 species	points = 1
< 5 species	points = 0

H 1.4. Interspersion of habitats

Decide from the diagrams below whether interspersion among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always high.*

None = 0 points



Low = 1 point

Moderate = 2 points

All three diagrams in this row are **HIGH** = 3points

Wetland name or number C

H 1.5. Special habitat features: Check the habitat features that are present in the wetland. *The number of checks is the number of points.* ____Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). ____Standing snags (dbh > 4 in) within the wetland ____Undercut banks are present for at least 6.6 ft (2 m) and/or overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft (10 m) ____Stable steep banks of fine material that might be used by beaver or muskrat for denning (> 30 degree slope) OR signs of recent beaver activity are present *(cut shrubs or trees that have not yet weathered where wood is exposed)* ____At least ¼ ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated *(structures for egg-laying by amphibians)* ____Invasive plants cover less than 25% of the wetland area in every stratum of plants (*see H 1.1 for list of strata*)	0
Total for H 1 Add the points in the boxes above	2

Rating of Site Potential If score is:___15-18 = H ___7-14 = M X 0-6 = L *Record the rating on the first page*

H 2.0. Does the landscape have the potential to support the habitat functions of the site?	
H 2.1. Accessible habitat (include *only habitat that directly abuts wetland unit*). *Calculate:* % undisturbed habitat 0 + [(% moderate and low intensity land uses)/2] 1 = 1 % If total accessible habitat is: > 1/3 (33.3%) of 1 km Polygon points = 3 20-33% of 1 km Polygon points = 2 10-19% of 1 km Polygon points = 1 < 10% of 1 km Polygon points = 0	0
H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. *Calculate:* % undisturbed habitat 22 + [(% moderate and low intensity land uses)/2] 1 = 23 % Undisturbed habitat > 50% of Polygon points = 3 Undisturbed habitat 10-50% and in 1-3 patches points = 2 Undisturbed habitat 10-50% and > 3 patches points = 1 Undisturbed habitat < 10% of 1 km Polygon points = 0	2
H 2.3. Land use intensity in 1 km Polygon: If > 50% of 1 km Polygon is high intensity land use points = (- 2) ≤ 50% of 1 km Polygon is high intensity points = 0	-2
Total for H 2 Add the points in the boxes above	0

Rating of Landscape Potential If score is:___4-6 = H ___1-3 = M X < 1 = L *Record the rating on the first page*

H 3.0. Is the habitat provided by the site valuable to society?	
H 3.1. Does the site provide habitat for species valued in laws, regulations, or policies? *Choose only the highest score that applies to the wetland being rated.* Site meets ANY of the following criteria: points = 2 — It has 3 or more priority habitats within 100 m (see next page) — It provides habitat for Threatened or Endangered species (any plant or animal on the state or federal lists) — It is mapped as a location for an individual WDFW priority species — It is a Wetland of High Conservation Value as determined by the Department of Natural Resources — It has been categorized as an important habitat site in a local or regional comprehensive plan, in a Shoreline Master Plan, or in a watershed plan Site has 1 or 2 priority habitats (listed on next page) within 100 m points = 1 Site does not meet any of the criteria above points = 0	0

Rating of Value If score is:___2 = H ___1 = M X 0 = L *Record the rating on the first page*

Wetland name or number C

WDFW Priority Habitats

Priority habitats listed by WDFW (see complete descriptions of WDFW priority habitats, and the counties in which they can be found, in: Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. http://wdfw.wa.gov/publications/00165/wdfw00165.pdf or access the list from here: http://wdfw.wa.gov/conservation/phs/list/)

Count how many of the following priority habitats are within 330 ft (100 m) of the wetland unit: ***NOTE:*** *This question is independent of the land use between the wetland unit and the priority habitat.*

— **Aspen Stands:** Pure or mixed stands of aspen greater than 1 ac (0.4 ha).

— **Biodiversity Areas and Corridors:** Areas of habitat that are relatively important to various species of native fish and wildlife (*full descriptions in WDFW PHS report*).

— **Herbaceous Balds:** Variable size patches of grass and forbs on shallow soils over bedrock.

— **Old-growth/Mature forests:** Old-growth west of Cascade crest – Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) > 32 in (81 cm) dbh or > 200 years of age. Mature forests – Stands with average diameters exceeding 21 in (53 cm) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80-200 years old west of the Cascade crest.

— **Oregon White Oak:** Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is important (*full descriptions in WDFW PHS report p. 158 – see web link above*).

— **Riparian:** The area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.

— **Westside Prairies:** Herbaceous, non-forested plant communities that can either take the form of a dry prairie or a wet prairie (*full descriptions in WDFW PHS report p. 161 – see web link above*).

— **Instream:** The combination of physical, biological, and chemical processes and conditions that interact to provide functional life history requirements for instream fish and wildlife resources.

— **Nearshore:** Relatively undisturbed nearshore habitats. These include Coastal Nearshore, Open Coast Nearshore, and Puget Sound Nearshore. (*full descriptions of habitats and the definition of relatively undisturbed are in WDFW report – see web link on previous page).*

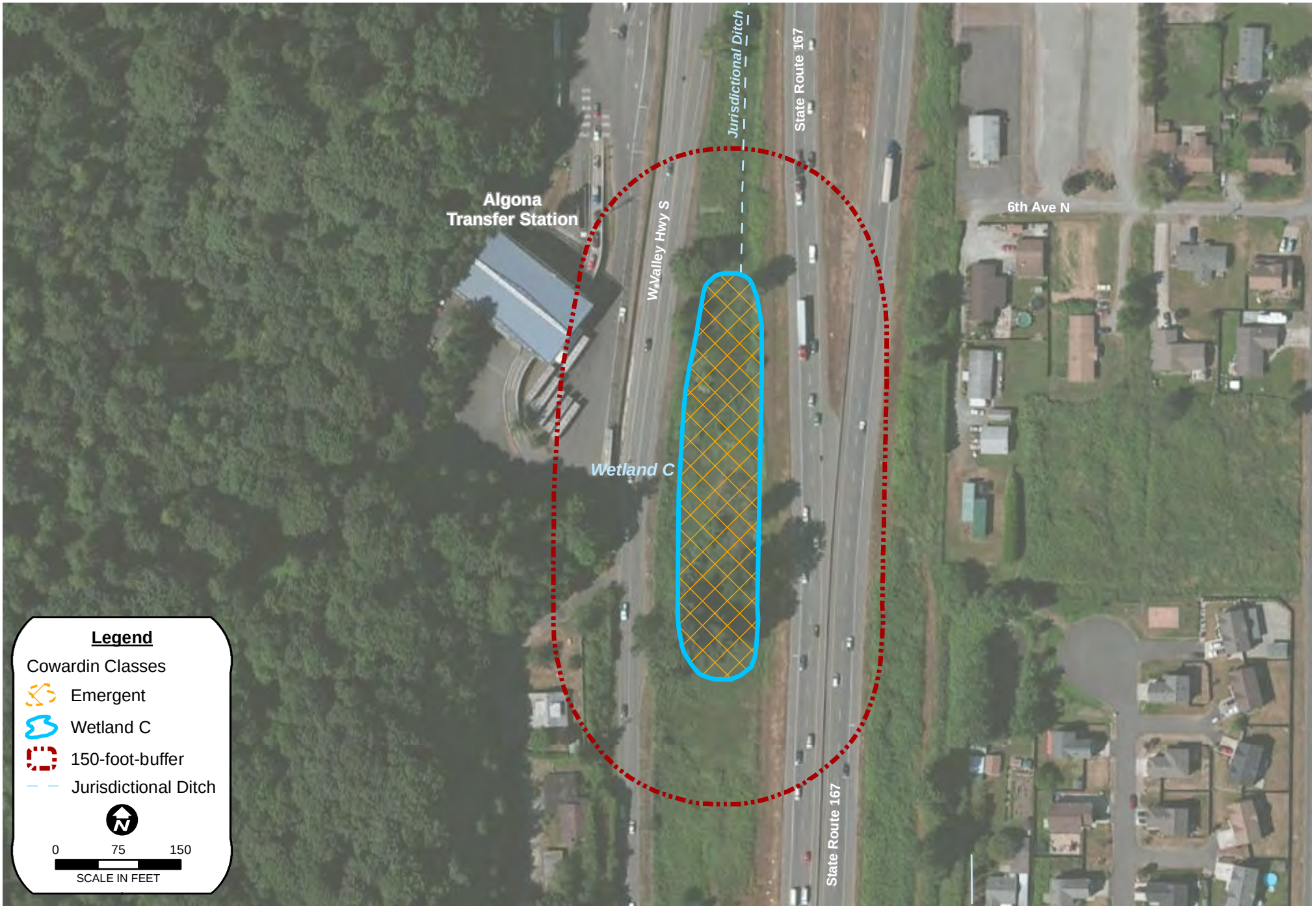
— **Caves:** A naturally occurring cavity, recess, void, or system of interconnected passages under the earth in soils, rock, ice, or other geological formations and is large enough to contain a human.

— **Cliffs:** Greater than 25 ft (7.6 m) high and occurring below 5000 ft elevation.

— **Talus:** Homogenous areas of rock rubble ranging in average size 0.5 - 6.5 ft (0.15 - 2.0 m), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.

— **Snags and Logs:** Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 20 in (51 cm) in western Washington and are > 6.5 ft (2 m) in height. Priority logs are > 12 in (30 cm) in diameter at the largest end, and > 20 ft (6 m) long.

Note: All vegetated wetlands are by definition a priority habitat but are not included in this list because they are addressed elsewhere.



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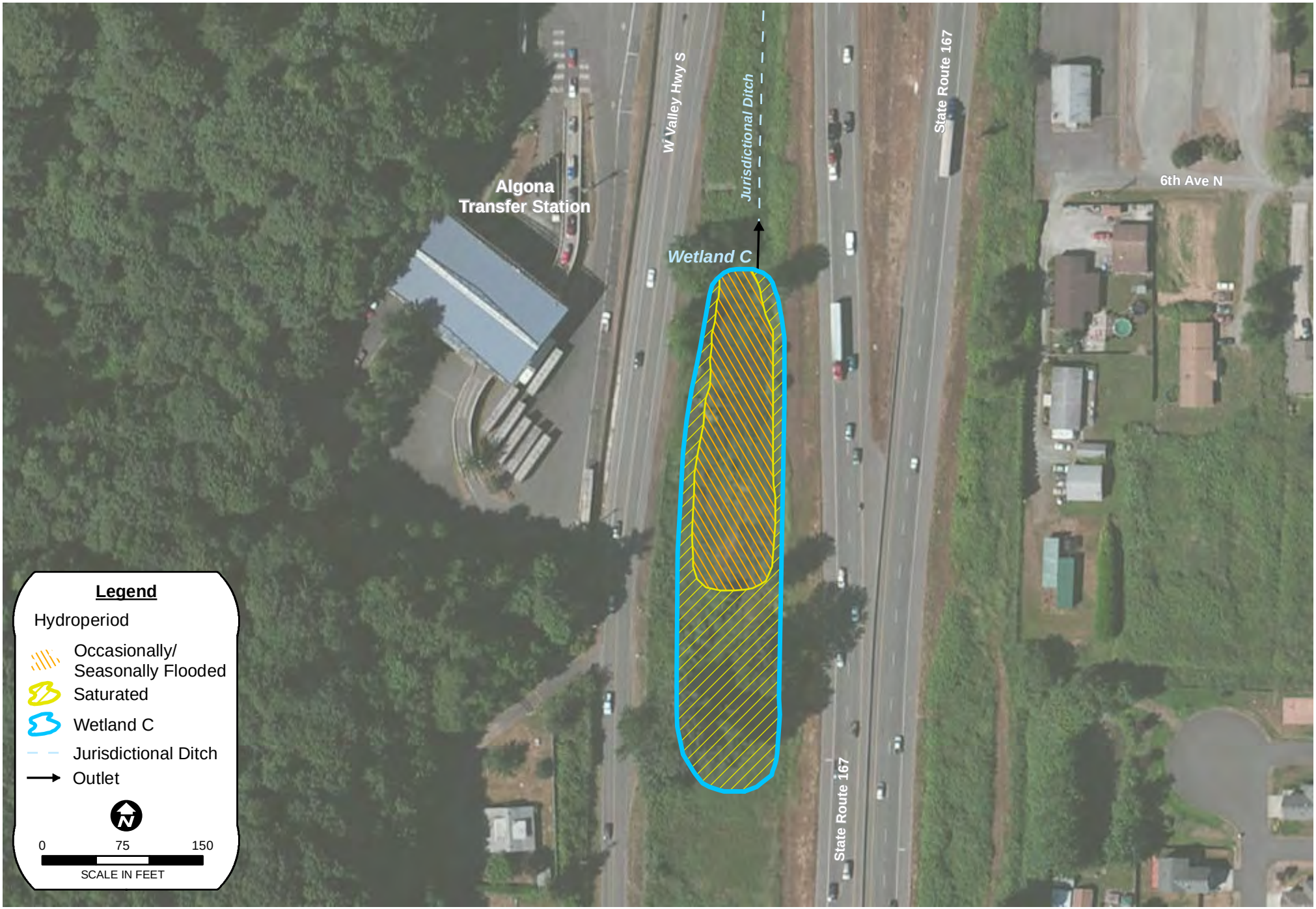
Date: 9/22/2015 | joel_hancock

Figure F

Cowardin Classes

Wetland C
King County SCRTS



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Date: 9/22/2015 | joel_hancock

Figure G

Hydroperiods

Wetland C
King County SCRTS

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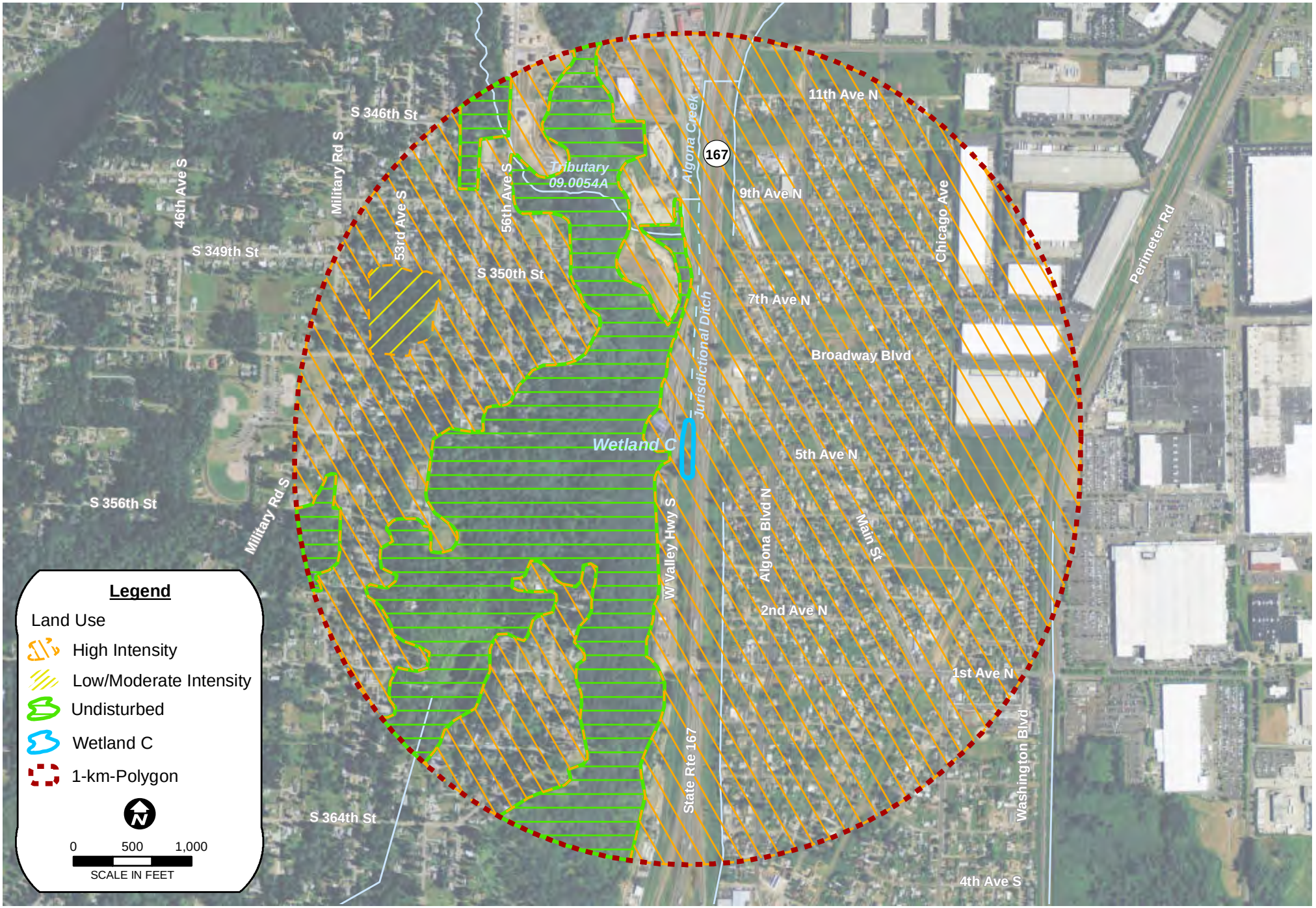
Date: 9/22/2015 | joel_hancock

Figure H

Contributing Basin

Wetland C
King County SCRTS



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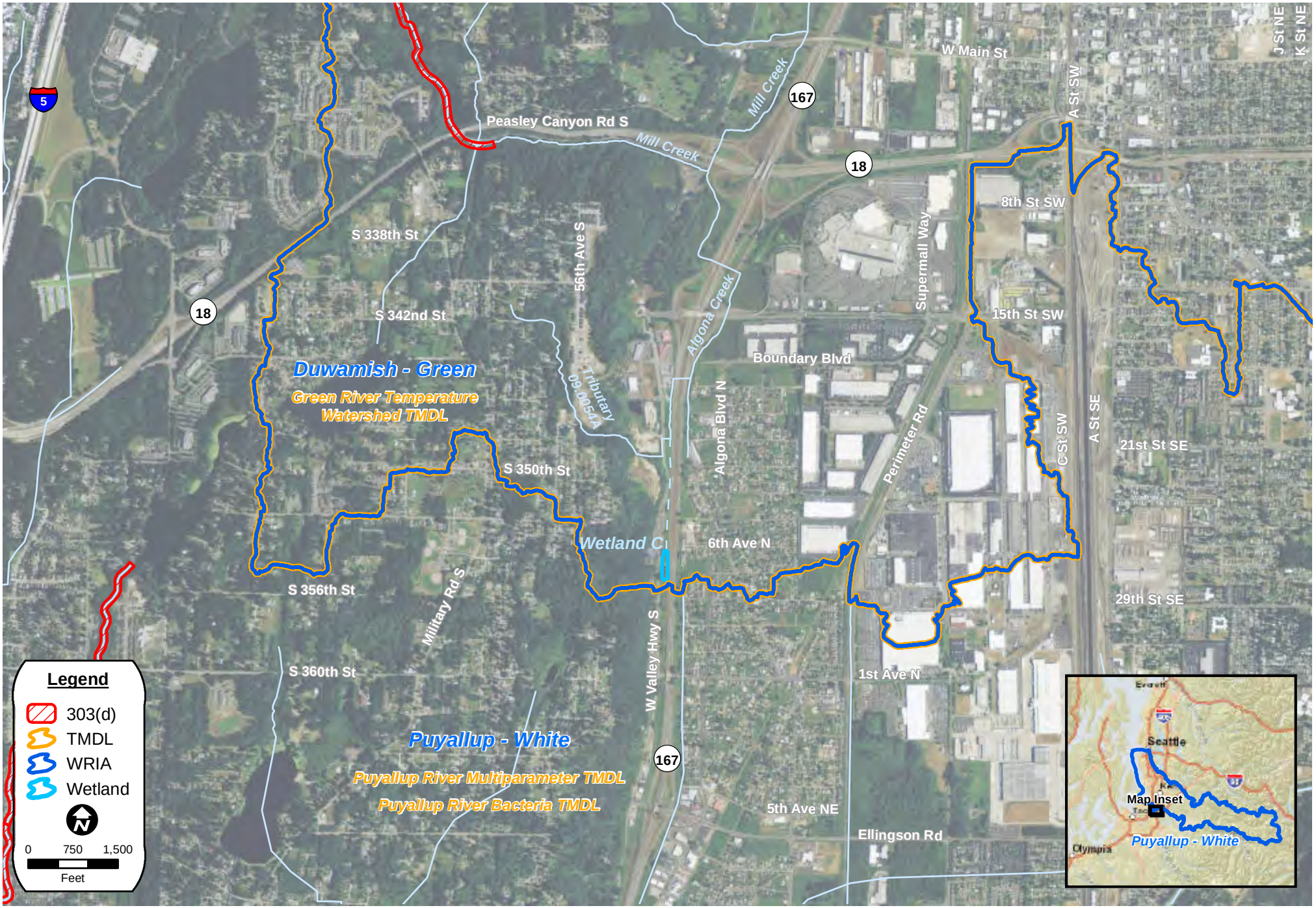
Date: 9/22/2015 | joel_hancock

Figure I

Accessible and Undisturbed Habitat in 1 KM Polygon

Wetland C
King County SCRTS



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Date: 9/18/2015 | joel_hancock

Figure J

303 (d) Waters, WRIAs, and TMDLs

Wetland C
King County SCRTS

Appendix C

Noise Methodology and Modeling

Noise Metrics

The following mathematical descriptors correlate with human response to sound, and are used to assess sounds that vary over time:

- Equivalent Sound Level (Leq): Leq is the average of a time-varying A-weighted sound level during a specified interval. The Leq is used to characterize complex, fluctuating sound levels with a single number. This study utilizes an hourly Leq.
- Maximum Sound Level (Lmax): Lmax is the maximum recorded A-weighted sound level for a given time interval or event. This study utilizes an hourly Lmax fast (125 millisecond averaging time) to correlate with the typical response time of the human ear.
- Percent Sound Level (Ln): Ln is the sound level that is exceeded n percent of the time; for example, L_{08} is the level exceeded 8 percent of the time. L_{25} is the sound level exceeded 25 percent of the time. Percent sound levels isolate louder events of short duration in a given measurement period, the smaller the percentage, the more shorter-duration events influence the value.

The appropriate descriptor for a given situation will depend on the following sound source, receiver, and analysis conditions:

- Transient character of the sound (constant level, changes frequently over time)
- Jurisdictional criteria (descriptors defined by municipal code, interpretations of code requirements, existing sound levels)
- Source characterization (influence of each sound source)

Noise Modeling Methodology

The primary methodology used for the environmental sound level analysis and prediction was a computer noise model. This model was created with the acoustic modeling software Cadna/A. Cadna/A uses the Control of Accuracy and Debugging for Numerical Applications (CADNA) computation engine developed by the Pierre et Marie Curie University of Paris. The Cadna/A model utilizes the International Organization for Standardization (ISO) 9613 standard for predicting outdoor sound levels (ISO 1996). Sound propagation over distances greater than 1,000 feet is strongly influenced by meteorological conditions. Special atmospheric conditions, such as inverted thermal gradients or downwind conditions can create a downward-refracting atmosphere that could potentially increase sound levels at large distances. The Cadna/A implementation of ISO 9613 always includes the effects of a moderately downward-refractive atmosphere. While under some atmospheric conditions the sound levels at great distances may be greater than what is predicted by Cadna/A, the received sound levels should generally be less (when no downward-refraction occurs) or much less (when upward-refraction occurs).

The Cadna/A model was built from CAD drawings provided by URS/AECOM, satellite imagery, and King County Geographic Information Systems data. The data contained within the noise model included: conceptual site layouts, topography, property boundaries, zoning, and streets (where applicable). After the noise model was constructed, sound emissions from both alternatives were predicted based on conceptual site layouts, expected facility equipment, and trip generation estimates. Where increases to local traffic are anticipated, traffic on public

roadways was also modeled. Sound emissions from vehicles operating within the site boundaries were only modeled where the receiving properties were zoned as residential or rural in the King County Noise Ordinance, as vehicles operated off of public roadways are exempt in receiving properties that are zoned commercial or industrial. The baseline permissible sound levels and the exceedances allowed for short-term sound events defined in the King County Noise Ordinance are typically applied as statistical sound levels (L_{25} for the baseline limit, L_{08} for the 5 dB exceedance, L_{02} for the 10 dB exceedance, and Lmax for the 15 dB exceedance). However, the level of project design detail available during environmental review pursuant to SEPA does not support this level of analysis. Therefore, this analysis assesses regulatory compliance using the baseline sound level limits applied as an hourly Leq metric, which is the average sound during one-hour. Potential noise impacts are also identified based on increases to existing average hourly noise conditions.

Table C-1. No Action Alternative, Long Term Daytime Ambient Noise Monitoring Hourly Data (LT-NA), dBA

Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}
6/28/13	12:00 PM	70	86	61	6/30/13	10:00 AM	68	82	56	7/1/13	7:00 PM	69	83	56
6/28/13	1:00 PM	70	91	55	6/30/13	11:00 AM	69	91	58	7/1/13	8:00 PM	68	84	57
6/28/13	2:00 PM	69	84	56	6/30/13	12:00 PM	68	79	60	7/1/13	9:00 PM	67	77	56
6/28/13	3:00 PM	68	86	57	6/30/13	1:00 PM	69	83	58	7/2/13	7:00 AM	70	87	63
6/28/13	4:00 PM	69	84	57	6/30/13	2:00 PM	68	85	59	7/2/13	8:00 AM	70	86	60
6/28/13	5:00 PM	68	81	57	6/30/13	3:00 PM	68	88	59	7/2/13	9:00 AM	70	81	60
6/28/13	6:00 PM	70	83	60	6/30/13	4:00 PM	68	80	58	7/2/13	10:00 AM	70	82	61
6/28/13	7:00 PM	69	84	60	6/30/13	5:00 PM	68	85	59	7/2/13	11:00 AM	70	85	61
6/28/13	8:00 PM	69	85	60	6/30/13	6:00 PM	68	83	60	7/2/13	12:00 PM	70	88	60
6/28/13	9:00 PM	69	85	58	6/30/13	7:00 PM	68	80	60	7/2/13	1:00 PM	70	87	63
6/29/13	9:00 AM	69	87	58	6/30/13	8:00 PM	67	79	58	7/2/13	2:00 PM	70	84	59
6/29/13	10:00 AM	69	85	61	6/30/13	9:00 PM	67	78	57	7/2/13	3:00 PM	69	85	58
6/29/13	11:00 AM	69	82	60	7/1/13	7:00 AM	70	84	61	7/2/13	4:00 PM	69	89	59
6/29/13	12:00 PM	69	88	58	7/1/13	8:00 AM	70	81	61	7/2/13	5:00 PM	68	82	57
6/29/13	1:00 PM	69	93	57	7/1/13	9:00 AM	70	82	61	7/2/13	6:00 PM	68	82	57
6/29/13	2:00 PM	69	84	58	7/1/13	10:00 AM	71	85	61	7/2/13	7:00 PM	69	87	59
6/29/13	3:00 PM	69	88	58	7/1/13	11:00 AM	70	81	58	7/2/13	8:00 PM	68	83	59
6/29/13	4:00 PM	69	84	58	7/1/13	12:00 PM	70	86	60	7/2/13	9:00 PM	67	79	57
6/29/13	5:00 PM	69	84	59	7/1/13	1:00 PM	71	83	63	7/3/13	7:00 AM	71	84	62
6/29/13	6:00 PM	68	89	60	7/1/13	2:00 PM	70	93	61	7/3/13	8:00 AM	71	81	63
6/29/13	7:00 PM	68	81	60	7/1/13	3:00 PM	69	88	59	7/3/13	9:00 AM	71	86	63
6/29/13	8:00 PM	68	81	58	7/1/13	4:00 PM	69	85	59	7/3/13	10:00 AM	71	88	61
6/29/13	9:00 PM	67	80	57	7/1/13	5:00 PM	68	80	58	7/3/13	11:00 AM	72	83	66
6/30/13	9:00 AM	68	86	53	7/1/13	6:00 PM	69	84	61	7/1/13	7:00 PM	69	83	56
Lower quartile L_{eq}		68			Median L_{eq}		69			Upper quartile L_{eq}		70		

Table C-2. Alternative 1, Long Term Daytime Ambient Noise Monitoring Hourly Data (LT-1), dBA

Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}
7/3/13	2:00 PM	63	93	50	7/5/13	10:00 AM	58	83	48	7/6/13	9:00 PM	60	86	49
7/3/13	3:00 PM	63	84	50	7/5/13	11:00 AM	59	87	48	7/7/13	9:00 AM	59	80	45
7/3/13	4:00 PM	61	83	50	7/5/13	12:00 PM	62	83	50	7/7/13	10:00 AM	58	80	47
7/3/13	5:00 PM	58	84	51	7/5/13	1:00 PM	58	81	48	7/7/13	11:00 AM	57	83	47
7/3/13	6:00 PM	58	87	49	7/5/13	2:00 PM	63	81	49	7/7/13	12:00 PM	61	84	47
7/3/13	7:00 PM	59	86	49	7/5/13	3:00 PM	63	84	54	7/7/13	1:00 PM	56	80	47
7/3/13	8:00 PM	58	84	49	7/5/13	4:00 PM	61	90	55	7/7/13	2:00 PM	60	79	47
7/3/13	9:00 PM	63	85	48	7/5/13	5:00 PM	61	86	55	7/7/13	3:00 PM	57	79	46
7/4/13	9:00 AM	64	85	54	7/5/13	6:00 PM	60	74	56	7/7/13	4:00 PM	59	80	47
7/4/13	10:00 AM	60	85	55	7/5/13	7:00 PM	60	76	57	7/7/13	5:00 PM	55	76	47
7/4/13	11:00 AM	62	86	55	7/5/13	8:00 PM	60	73	57	7/7/13	6:00 PM	55	72	47
7/4/13	12:00 PM	61	90	54	7/5/13	9:00 PM	61	83	56	7/7/13	7:00 PM	59	83	47
7/4/13	1:00 PM	60	83	54	7/6/13	9:00 AM	64	85	49	7/7/13	8:00 PM	56	76	50
7/4/13	2:00 PM	59	75	54	7/6/13	10:00 AM	58	83	47	7/7/13	9:00 PM	55	71	50
7/4/13	3:00 PM	61	79	54	7/6/13	11:00 AM	59	79	48					
7/4/13	4:00 PM	62	88	56	7/6/13	12:00 PM	57	81	48					
7/4/13	5:00 PM	62	91	54	7/6/13	1:00 PM	57	78	48					
7/4/13	6:00 PM	60	74	56	7/6/13	2:00 PM	58	87	49					
7/4/13	7:00 PM	61	84	56	7/6/13	3:00 PM	56	76	48					
7/4/13	8:00 PM	59	78	56	7/6/13	4:00 PM	59	84	49					
7/4/13	9:00 PM	60	83	56	7/6/13	5:00 PM	55	74	49					
7/5/13	7:00 AM	61	76	56	7/6/13	6:00 PM	56	79	49					
7/5/13	8:00 AM	61	83	47	7/6/13	7:00 PM	56	76	50					
7/5/13	9:00 AM	60	79	47	7/6/13	8:00 PM	58	80	52					
Lower quartile L_{eq}		58			Median L_{eq}		59			Upper quartile L_{eq}		61		

Table C-3. Alternative 2, Long Term Daytime Ambient Noise Monitoring Hourly Data (LT-2), dBA

Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}	Date	Time	L_{eq}	L_{max}	L_{min}
6/28/13	12:00 PM	61	73	56	6/30/13	10:00 AM	63	72	57	7/1/13	7:00 PM	62	68	56
6/28/13	1:00 PM	59	66	55	6/30/13	11:00 AM	63	78	56	7/1/13	8:00 PM	61	70	52
6/28/13	2:00 PM	59	70	54	6/30/13	12:00 PM	62	71	57	7/1/13	9:00 PM	61	71	53
6/28/13	3:00 PM	60	67	53	6/30/13	1:00 PM	61	78	55	7/2/13	7:00 AM	63	68	57
6/28/13	4:00 PM	60	71	55	6/30/13	2:00 PM	61	68	56	7/2/13	8:00 AM	63	68	58
6/28/13	5:00 PM	60	78	54	6/30/13	3:00 PM	60	70	53	7/2/13	9:00 AM	64	74	59
6/28/13	6:00 PM	63	73	57	6/30/13	4:00 PM	61	67	55	7/2/13	10:00 AM	63	68	58
6/28/13	7:00 PM	62	73	55	6/30/13	5:00 PM	62	69	56	7/2/13	11:00 AM	63	73	54
6/28/13	8:00 PM	62	78	56	6/30/13	6:00 PM	63	71	58	7/2/13	12:00 PM	62	69	56
6/28/13	9:00 PM	61	69	54	6/30/13	7:00 PM	63	71	56	7/2/13	1:00 PM	63	73	56
6/29/13	9:00 AM	63	72	57	6/30/13	8:00 PM	62	71	56	7/2/13	2:00 PM	60	76	55
6/29/13	10:00 AM	63	72	58	6/30/13	9:00 PM	62	74	56	7/2/13	3:00 PM	60	75	55
6/29/13	11:00 AM	63	72	57	7/1/13	7:00 AM	63	73	57	7/2/13	4:00 PM	59	71	54
6/29/13	12:00 PM	63	72	55	7/1/13	8:00 AM	64	77	60	7/2/13	5:00 PM	60	72	56
6/29/13	1:00 PM	62	69	55	7/1/13	9:00 AM	64	75	59	7/2/13	6:00 PM	61	74	55
6/29/13	2:00 PM	62	75	56	7/1/13	10:00 AM	64	73	56	7/2/13	7:00 PM	62	71	57
6/29/13	3:00 PM	62	71	55	7/1/13	11:00 AM	63	74	58	7/2/13	8:00 PM	64	74	57
6/29/13	4:00 PM	63	72	57	7/1/13	12:00 PM	64	78	56	7/2/13	9:00 PM	64	75	56
6/29/13	5:00 PM	63	74	56	7/1/13	1:00 PM	64	76	58	7/3/13	7:00 AM	64	79	60
6/29/13	6:00 PM	62	70	55	7/1/13	2:00 PM	62	83	56	7/3/13	8:00 AM	65	71	60
6/29/13	7:00 PM	63	75	56	7/1/13	3:00 PM	61	75	55	7/3/13	9:00 AM	64	77	59
6/29/13	8:00 PM	63	69	55	7/1/13	4:00 PM	60	75	54					
6/29/13	9:00 PM	63	70	58	7/1/13	5:00 PM	61	74	54					
6/30/13	9:00 AM	62	73	54	7/1/13	6:00 PM	63	75	57					
Lower quartile L_{eq}		61			Median L_{eq}		62			Upper quartile L_{eq}		63		

Table C-4. Operational Noise Model Sound Level Input Data

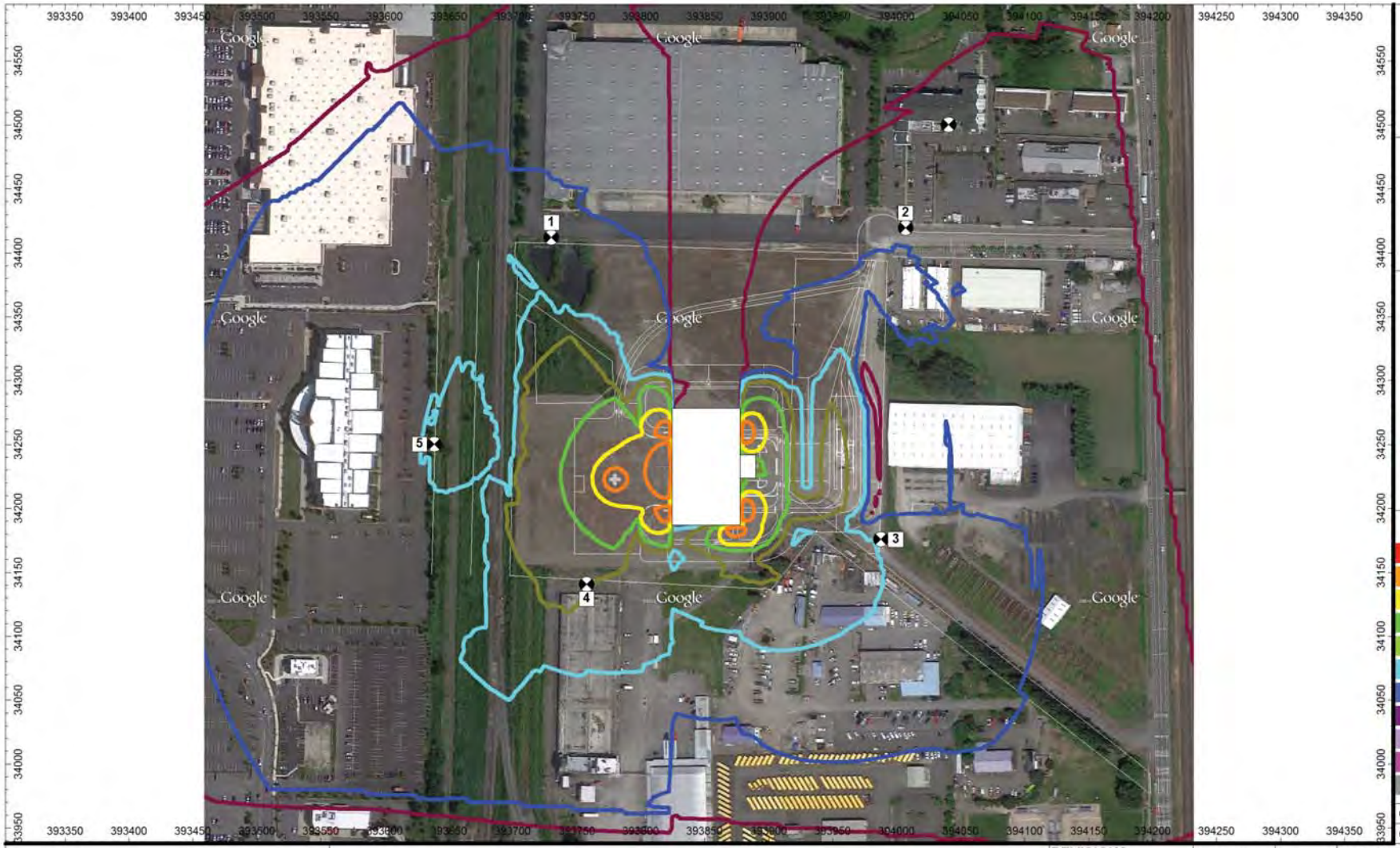
Sound Source	Sound Level at 50 feet	Usage Factor	Reference
Vehicles			
Commercial Haul	84	100%	FHWA Specification 721.560
Residential Haul	65	100%	FHWA Specification 721.560
Stationary Equipment			
Compactor	102	100%	South Transfer Station measurements, 2013, Seattle, WA
Compactor Power Pack	90	100%	
Compactor Radiator	96	100%	
Mobile Equipment			
Backup Alarm	85	10%	Greenbusch historical data
Goat Truck	94	50%	Algona Transfer Station measurements, 2013
Tipping Floor Activities			
Front End Loader	91	100%	FHWA 2006
Dump Truck	104	100%	
Pickup Truck	85	100%	FHWA 2006 + 10 dB

Table B-5. Noise Model Operational Traffic Input Data, Vehicles Per Hour

Vehicle Class	2020		2040	
	Weekday	Saturday	Weekday	Saturday
Self-Haul – peak hour	73	162	94	209
Commercial Haul – peak hour	17	12	19	14
Total Trip Generation	90	174	113	223

Source: Totals from the Transpo Group Trip Generation Summary, July 2013.

Self-haul/commercial haul distributions based on field observations by The Greenbusch Group, Inc., 2013



OBJECT LEGEND:

- Point Source
- Line Source
- vert. Area Source
- Road
- Building
- Contour Line
- Receiver
- Calculation Area

GRID LEGEND:

85 dBA
80 dBA
75 dBA
70 dBA
65 dBA
60 dBA
55 dBA
50 dBA
45 dBA
40 dBA
35 dBA

GRID SPACING:	3.05 m
GRID HEIGHT:	1.52 m

South County Recycling and Transfer Station

Auburn/Algona/King County, WA

ACOUSTICAL , AUDIO / VIDEO & MECHANICAL ENGINEERING
1900 WEST NICKERSON STREET SUITE 201 SEATTLE, WA 98119
(206) 378-0569 (206) 378-0641 FAX

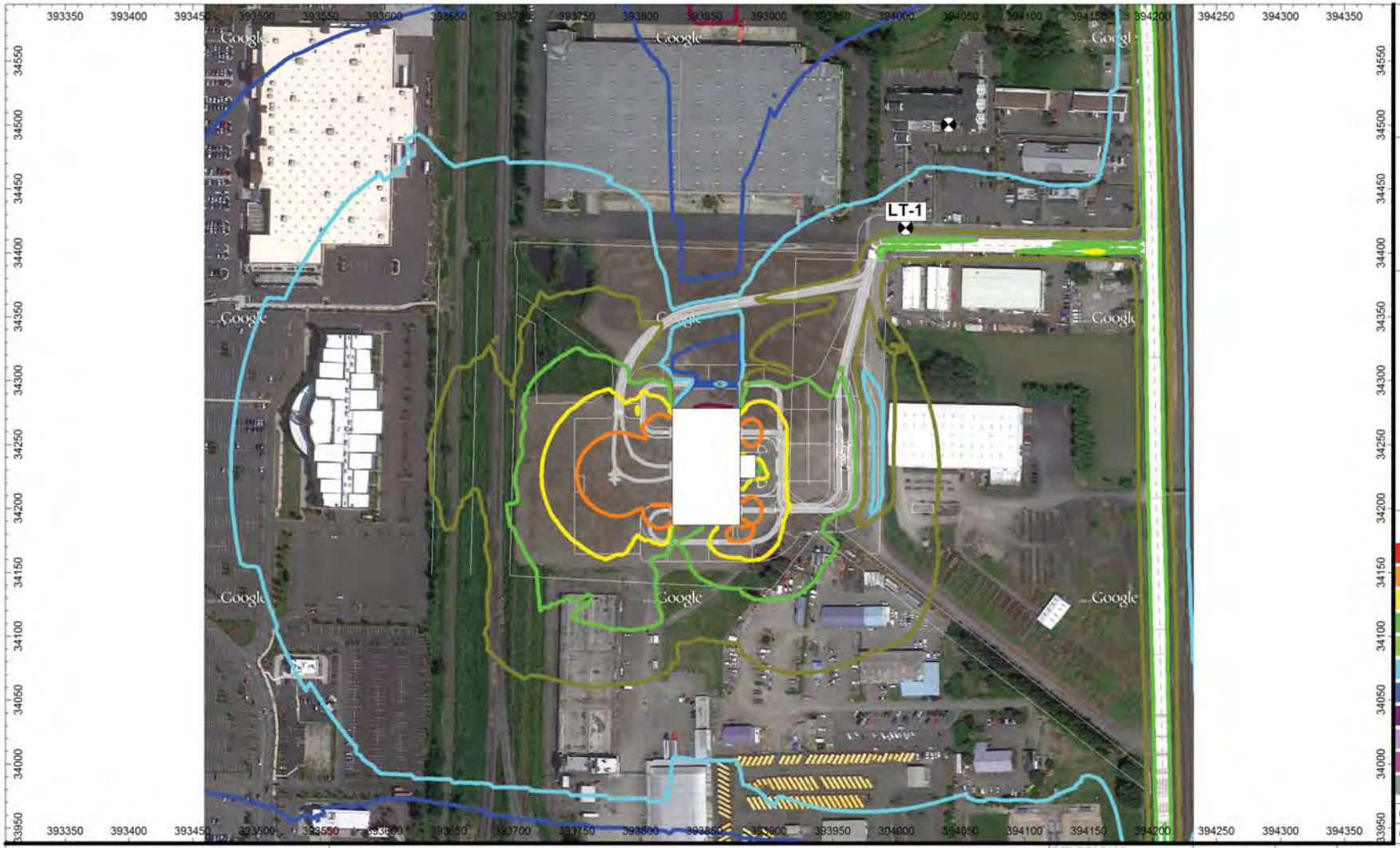
REVISIONS

NO.	REVISION	DATE
1	Draft	8/1/13
2	Rev Draft	8/4/16

PROJECT ACOUSTICIAN:	ACJ
DRAWN BY:	ACJ/JBM
SCALE:	
DATE:	8/4/16
JOB NO:	2010.211

PLOT DESCRIPTION

Alternative 1
Code Analysis
2040 weekday peak hour
(project sound only)



OBJECT LEGEND:

- Point Source
- Line Source
- vert. Area Source
- Road
- Building
- Contour Line
- Receiver
- Calculation Area

GRID LEGEND:

85 dBA
80 dBA
75 dBA
70 dBA
65 dBA
60 dBA
55 dBA
50 dBA
45 dBA
40 dBA
35 dBA

GRID SPACING:	3.05 m
GRID HEIGHT:	1.52 m

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Auburn/Algona/King County, WA

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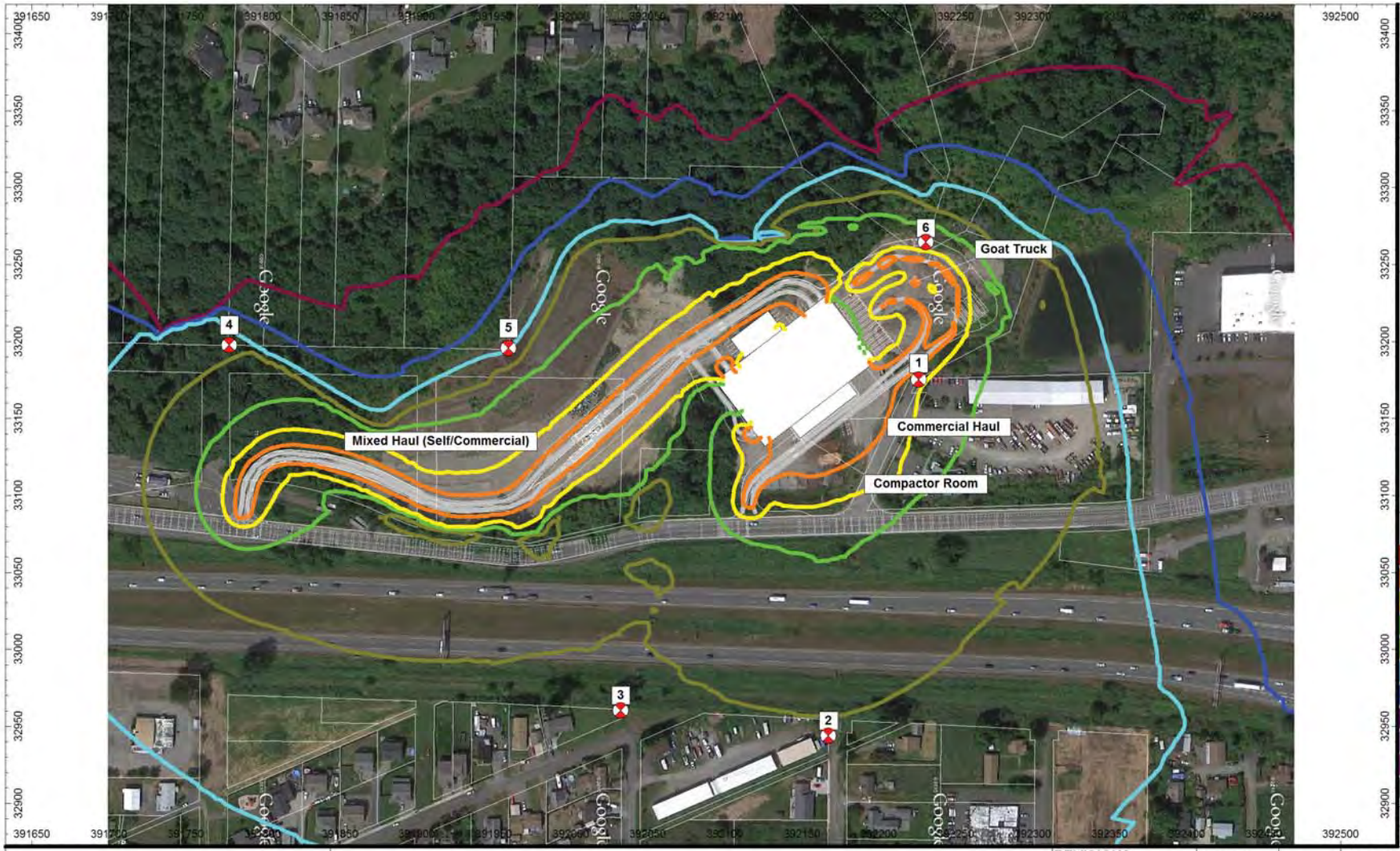
PROJECT ACOUSTICIAN:	ACJ
DRAWN BY:	ACJ/JBM
SCALE:	
DATE:	8/4/16
JOB NO:	2010.211

PLOT DESCRIPTION

Alternative 1
Impact Analysis
2040 weekday peak hour
(project sound only)



OBJECT LEGEND:

- Point Source
- Line Source
- vert. Area Source
- Road
- Building
- Contour Line
- Line of Fault
- Receiver
- Calculation Area

GRID LEGEND:

85 dBA
80 dBA
75 dBA
70 dBA
65 dBA
60 dBA
55 dBA
50 dBA
45 dBA
40 dBA
35 dBA

GRID SPACING:	3.05 m
GRID HEIGHT:	1.52 m

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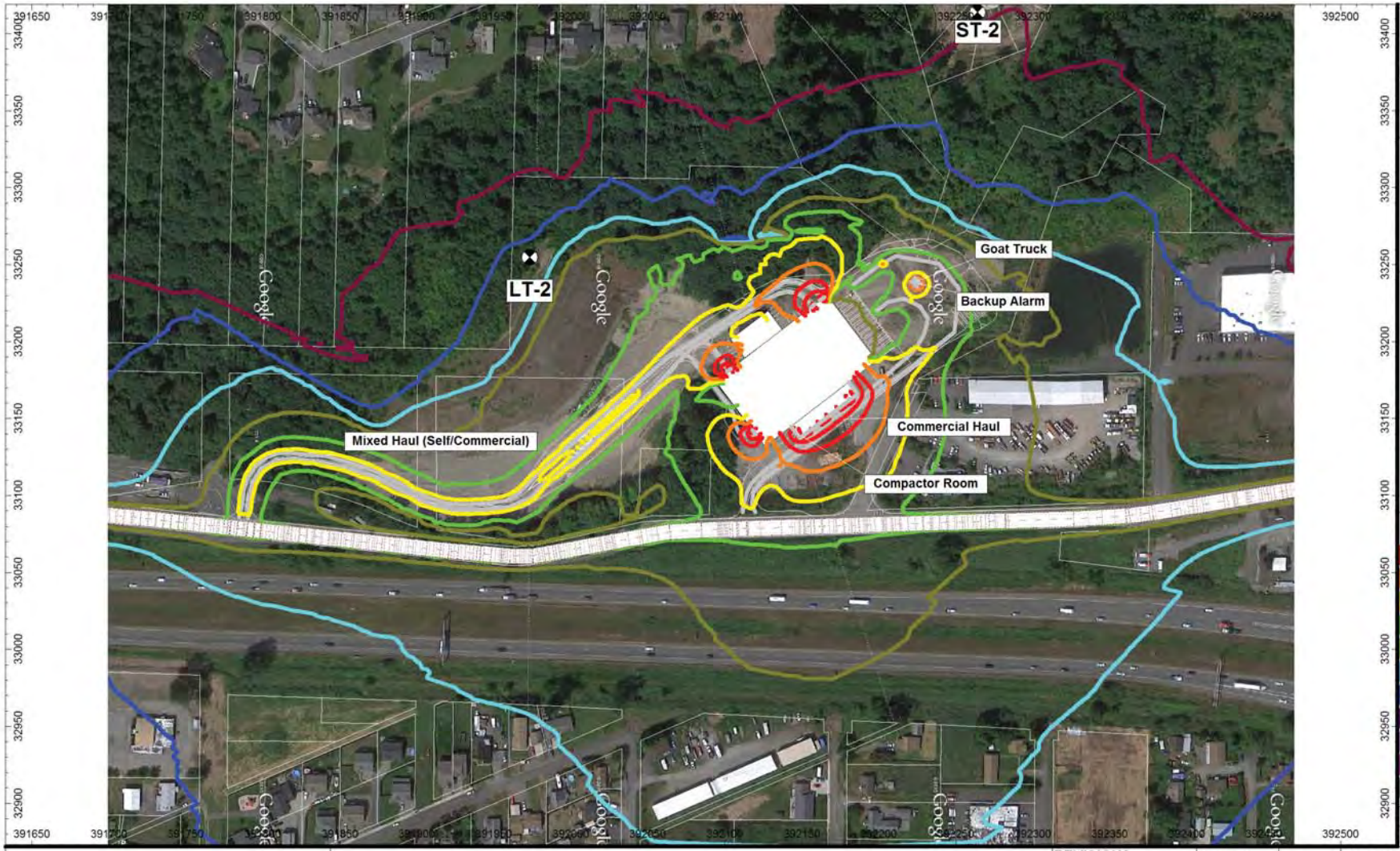
4	Rev Draft	8/4/16

PROJECT ACOUSTICIAN:	ACJ
DRAWN BY:	ACJ/JBM
SCALE:	
DATE:	8/4/16
JOB NO:	2010.211

PLOT DESCRIPTION

Preliminary Site Layout
Regulatory Compliance
2040 weekday peak hour
(project sound only)



OBJECT LEGEND:

- Point Source
- Line Source
- vert. Area Source
- Road
- Building
- Contour Line
- Line of Fault
- Receiver
- Calculation Area

GRID LEGEND:

85 dBA
80 dBA
75 dBA
70 dBA
65 dBA
60 dBA
55 dBA
50 dBA
45 dBA
40 dBA
35 dBA

GRID SPACING:	3.05 m
GRID HEIGHT:	1.52 m

South County Recycling and Transfer Station

Auburn/Algona/King County, WA

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PROJECT ACOUSTICIAN:	ACJ
DRAWN BY:	ACJ/JBM
SCALE:	
DATE:	8/4/16
JOB NO:	2010.211

PLOT DESCRIPTION

Preliminary Site Layout
Impact Analysis
2040 weekday peak hour
(project sound only)

Appendix D

Visual Quality Rating Analysis Matrix

VISUAL ANALYSIS MATRIX

Project Title King County SCRTS Project

ALTERNATIVE		ORIENTATION TO FACILITY	VIVIDNESS				INTACTNESS			UNITY	
			LANDFORM	VEGETATIVE	MAN-MADE ELEMENTS	AVERAGE	DEVELOPMENT	ENCROACHMENT	AVERAGE	UNITY	TOTAL VISUAL QUALITY
No Action Alternative											
VIEWPOINT NA-A	EXISTING	To	2	5	2	3.00	4	3	3.5	3	3.17
	PROPOSED		2	5	2	3.00	4	3	3.5	3	3.17
VIEWPOINT NA-B	EXISTING	To	2	4	4	3.33	4	5	4.5	3	3.61
	PROPOSED		2	4	4	3.33	4	5	4.5	3	3.61
VIEWPOINT NA-C	EXISTING	To	2	2	1	1.67	3	2	2.5	1	1.72
	PROPOSED		2	2	1	1.67	3	2	2.5	1	1.72
VIEWPOINT NA-D	EXISTING	To	1	2	1	1.33	3	2	2.5	1	1.61
	PROPOSED		1	2	1	1.33	3	2	2.5	1	1.61
VIEWPOINT NA-E	EXISTING	To	3	3	2	2.67	3	4	3.5	1	2.39
	PROPOSED		3	3	2	2.67	3	4	3.5	1	2.39

Vividness:
7- Very High
6 - High
5 - Moderately High
4- Average
3 - Moderately Low
2 - Low
1 - Very Low
-- Non existent

Intactness:
Development:
7 - No development
6- Little development
5 - Some development
4 - Average level of development
3 - Moderately high development
2 - High level of development
1 - Very high level of development
Encroachment (undesirable eyesores):
7 - None
6 - Few
5 - Some
4 - Average
3 - Several
2- Many
1 - Very Many

Unity:
7 - Very High
6 - High
5 - Moderately High
4 - Average
3 - Moderately Low
2 - Low
1 - Very Low
- - Non existent

Existing

Equal to Existing

Higher than Existing

Rater's Total Visual Quality Score Breakdown
7 - Dramatic, Pristine Natural Environment with water, mountains, and mature vegetation or Superb example of built environment in dramatic physical setting.
6 - Very High
5 - High
4 - Moderately High
3 - Average
2 - Moderately Low
1 - Low

VISUAL ANALYSIS MATRIX

Project Title King County SCRTS Project

ALTERNATIVE		ORIENTATION TO FACILITY	VIVIDNESS				INTACTNESS			UNITY	TOTAL VISUAL QUALITY
			LANDFORM	VEGETATIVE	MAN-MADE ELEMENTS	AVERAGE	DEVELOPMENT	ENCROACHMENT	AVERAGE	UNITY	
Alternative 1											
VIEWPOINT 1-A	EXISTING	To	4	4	3	3.67	2	6	4	4	3.89
	PROPOSED		4	4	2	3.33	2	5	3.5	2	2.94
VIEWPOINT 1-B	EXISTING	To	3	4	3	3.33	3	6	4.5	4	3.94
	PROPOSED		3	4	2	3	2	5	3.5	3	3.17
VIEWPOINT 1-C	EXISTING	To	2	2	2	2	3	4	3.5	3	2.83
	PROPOSED		2	1	1	1.33	2	4	3	2	2.11
VIEWPOINT 1-D	EXISTING	To	2	4	2	2.67	4	5	4.5	4	3.72
	PROPOSED		2	4	2	2.67	4	5	4.5	4	3.72
VIEWPOINT 1-E	EXISTING	To	3	3	1	2.33	5	5	5	2	3.11
	PROPOSED		1	1	1	1	2	3	2.5	1	1.50
VIEWPOINT 1-F	EXISTING	To	2	3	1	2	2	2	2	1	1.67
	PROPOSED		2	2	1	1.67	2	1	1.5	1	1.39

Vividness:
7- Very High
6 - High
5 - Moderately High
4- Average
3 - Moderately Low
2 - Low
1 - Very Low
-- Non existent

Intactness:
Development:
7 - No development
6- Little development
5 - Some development
4 - Average level of development
3 - Moderately high development
2 - High level of development
1 - Very high level of development
Encroachment (undesirable eyesores):
7 - None
6 - Few
5 - Some
4 - Average
3 - Several
2- Many
1 - Very Many

Unity:
7 - Very High
6 - High
5 - Moderately High
4 - Average
3 - Moderately Low
2 - Low
1 - Very Low
- - Non existent

Existing

Equal to Existing

Higher than Existing

Rater's Total Visual Quality Score Breakdown
7 - Dramatic, Pristine Natural Environment with water, mountains, and mature vegetation or Superb example of built environment in dramatic physical setting.
6 - Very High
5 - High
4 - Moderately High
3 - Average
2 - Moderately Low
1 - Low

VISUAL ANALYSIS MATRIX

Project Title King County SCRTS Project

ALTERNATIVE		ORIENTATION TO FACILITY	VIVIDNESS				INTACTNESS			UNITY	TOTAL VISUAL QUALITY
			LANDFORM	VEGETATIVE	MAN-MADE ELEMENTS	AVERAGE	DEVELOPMENT	ENCROACHMENT	AVERAGE	UNITY	
Alternative 2											
VIEWPOINT 2-A	EXISTING	To	4	5	4	4.33	3	4	3.5	4	3.94
	PROPOSED		4	5	4	4.33	3	4	3.5	4	3.94
VIEWPOINT 2-B	EXISTING	To	4	4	5	4.33	4	6	5	5	4.78
	PROPOSED		4	4	5	4.33	4	6	5	5	4.78
VIEWPOINT 2-C	EXISTING	To	4	4	4	4	4	6	5	4	4.33
	PROPOSED		4	4	4	4	4	5	4.5	4	4.17
VIEWPOINT 2-D	EXISTING	To	3	4	3	3.33	4	3	3.5	3	3.28
	PROPOSED		3	3	2	2.67	3	2	2.5	3	2.72

Vividness:
7- Very High
6 - High
5 - Moderately High
4- Average
3 - Moderately Low
2 - Low
1 - Very Low

Intactness:
Development:
7 - No development
6- Little development
5 - Some development
4 - Average level of development
3 - Moderately high development
2 - High level of development
1 - Very high level of development
Encroachment (undesirable eyesores):
7 - None
6 - Few
5 - Some
4 - Average
3 - Several
2- Many
1 - Very Many

Unity:
7 - Very High
6 - High
5 - Moderately High
4 - Average
3 - Moderately Low
2 - Low
1 - Very Low
- - Non existent

Existing

Equal to Existing

Higher than Existing

Rater's Total Visual Quality Score Breakdown
7 - Dramatic, Pristine Natural Environment with water, mountains, and mature vegetation or Superb example of built environment in dramatic physical setting.
6 - Very High
5 - High
4 - Moderately High
3 - Average
2 - Moderately Low
1 - Low

Appendix E

Transportation Data and

Figures

transpogroup
WHAT TRANSPORTATION CAN BE.

MEMORANDUM

Date:	May 27, 2016	**TG:**	12014.00
To:	Dave Hill, City of Algona		
From:	Mike Swenson, Transpo Group		
Subject:	2013 and 2015 Traffic Count Comparison – Response to Comment A-168		

This memorandum summarizes the results of the sensitivity analysis conducted in response to the comment received on the King County SCRTS Draft EIS by the City of Algona (Comment A-168). The comment noted that at several locations, the traffic counts collected in March 2015 for the DEIS were lower than those presented in the July 2014 Transpo Report[1], which were 2013 traffic counts. In response to the comment, this memorandum provides a comparison of the 2013 and 2015 traffic counts and evaluates intersection levels of service for the 2020 and 2040 conditions based on the higher counts.

Traffic Volumes Comparison

Traffic counts were collected in April 2013 for the July 2014 Report and collected in March 2015 for the King County SCRTS Draft EIS. The total entering volumes at the DEIS study intersections are shown below in Table 1. The detailed 2013 traffic counts are provided in Attachment A.

Table 1. 2013 and 2015 Traffic Volume Comparison

	Total Entering Volumes			
Study Intersection	**2013[1]**	**2015[2]**	**Difference (2013 less 2015 vols)**	**Percent Difference**
1. W Valley Hwy N / Main St	**1,265**	**1,145**	**-120**	**-9%**
2. W Valley Hwy N / SR 18 WB Ramps	1,295	1,490	195	15%
3. W Valley Hwy N / SR 18 EB Ramps	2,265	2,275	10	0%
4. W Valley Hwy N / Peasley Canyon Rd	**3,140**	**3,020**	**-120**	**-4%**
5. C St SW / Main St	**1,965**	**1,635**	**-330**	**-17%**
6. C St SW / SR 18 WB Ramps	**2,020**	**1,805**	**-215**	**-11%**
7. C St SW / SR 18 EB Ramps	2,505	2,570	65	3%
8. C St SW / 8th St SW	2,090	2,195	105	5%
9. W Valley Hwy / 15th St SW	**2,730**	**2,725**	**-5**	**0%**
10. SR 167 SB Ramps / 15th St SW	2,105	2,185	80	4%
11. SR 167 NB Ramps / 15th St SW	2,310	2,340	30	1%
12. O St / 15th St SW	2,085	2,150	65	3%
13. Market St / 15th St SW	1,110	1,140	30	3%
14. Supermall Way / 15th St SW	2,005	2,095	90	4%
15. Perimeter Rd / 15th St SW	2,035	2,035	0	0%
16. C St SW / 15th St SW	2,505	2,640	135	5%
17. W Valley Hwy / 1st Ave N	**1,235**	**1,185**	**-50**	**-4%**
18. W Valley Hwy / Ellingson Rd	-[3]	1,095	-	-
19. SR 167 SB Ramps / Ellingson Rd	-	1,145	-	-
20. SR 167 NB Ramps / Ellingson Rd	-	1,435	-	-
21. C St SW / GSA Access	1,360	1,370	10	1%
22. C St SW / Safeway Access	1,300	1,340	40	3%
23. C St SW / Ellingson Rd	2,380	2,595	215	9%
Total	**39,705**	**39,935**	**230**	**1%**

Note: The shaded rows are those where the entering traffic volumes in 2013 were higher than 2015.
1. Traffic Counts collected in April 2013.
2. Traffic Counts collected in March 2015.
3. No traffic counts collected in April 2013 at this study intersection.

[1] *South County Recycling and Transfer Station Transportation Impact Analysis*, Transpo Group (2014).

As shown in Table 16 of the study area intersections showed higher intersection volumes in 2013 then observed in 2015. The locations where 2013 traffic counts are higher then 2015 counts are highlighted. At these 6 locations, the traffic volumes in 2015 were 4 to 17 percent lower than the 2013 traffic counts, except at the E Valley Highway / 15th Street SW intersection. This intersection had 5 less vehicles in 2015 compared to 2013 resulting in approximately 0 percent change and as a result was not examined to maintain traffic volume balancing between study intersections. The remaining 5 study intersections were analyzed using the 2013 traffic counts instead of the 2015 traffic counts.

Consistent with the DEIS, a background 2 percent per year annual growth rate was applied to the 2013 traffic counts to forecast the future 2020 and 2040 traffic volumes as well as to forecast the existing 2015 traffic volumes. Minor adjustments were made to account for balancing between study intersections. The pipeline projects included in the DEIS were also assumed.

Traffic Operations

The 5 study intersections were analyzed consistent with the methodology described in the DEIS for existing conditions as well as future 2020 and 2040 conditions.

The existing conditions operations are summarized in Table 2 below comparing the Level of Service (LOS) for the 2013 and 2015 traffic counts.

Table 2. Existing Conditions LOS Comparison

	DEIS - Existing Conditions (2015 Counts)			2015 Existing Conditions (2013 Counts)		
Study Intersection	**LOS[1]**	**Delay[2]**	**V/C[3]**	**LOS**	**Delay**	**V/C**
1. W Valley Hwy S / Main St	B	14.9	0.57	B	16.8	0.6
4. W Valley Hwy S / Peasley Canyon Rd	C	27.8	0.86	D	36.1	0.92
5. C St SW / Main St	B	17.8	0.69	C	24.3	0.76
6. C St SW / SR 18 WB Ramps	B	18.4	0.51	C	21.5	0.61
17. W Valley Hwy / 1st Ave N	A	7.1	0.67	A	9.7	0.76

1. Level of service, based on 2000 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.

Table 2 shows that with the 2013 traffic counts, the 5 study intersections are shown to operate at LOS D or better compared to LOS C or better using the 2015 traffic counts reported in the DEIS. This meets the It should be noted that the existing conditions based on the 2013 traffic counts includes both higher entering volumes as well as a 2 percent annual growth rate to forecast the 2015 existing conditions.

The future 2020 and 2040 operations are shown in Tables 3 and 4, respectively.

Under 2020 conditions as shown in Table 3, consistent with the DEIS operations (using the 2015 traffic counts) the operations using the 2013 traffic counts are anticipated to be the same for No Action, Alternative 1 and Alternative 2. Based on the 2013 traffic counts, the 2020 conditions are forecast to operate at LOS C or better along W Valley Highway at the Main Street and 1st Avenue N intersections and at the C Street SW / SR 18 Westbound Ramps intersection. The W Valley Highway / Peasley Canyon Road and C Street SW / Main Street intersections are anticipated to operate at LOS E; whereas they were forecast to operate at LOS D using the 2015 traffic counts. Alternative 1 and Alternative 2 are anticipated to add less than 3 seconds at either study intersection compared to No Action using the 2013 traffic counts and as such there is no resulting impact.

Table 3. Future 2020 Conditions LOS Comparison

Study Intersection	No Action			Alternative 1			Alternative 2		
	LOS[1]	Delay[2]	V/C[3]	LOS	Delay	V/C	LOS	Delay	V/C
DEIS – (2015 Counts)									
1. W Valley Hwy S / Main St	C	20.8	0.56	C	20.9	0.56	C	20.8	0.56
4. W Valley Hwy S / Peasley Canyon Rd	D	53.5	0.98	D	51.9	0.97	D	54.8	0.98
5. C St SW / Main St	D	36.4	0.85	D	36.5	0.86	D	36.3	0.85
6. C St SW / SR 18 WB Ramps	B	19.3	0.51	B	19.6	0.51	B	19.3	0.51
17. W Valley Hwy / 1st Ave N	A	8.5	0.73	A	8.4	0.72	A	8.5	0.73
2013 Counts									
1. W Valley Hwy S / Main St	C	23.1	0.64	C	23.2	0.64	C	23	0.64
4. W Valley Hwy S / Peasley Canyon Rd	E	66	1.05	E	68.5	1.05	E	67.2	1.06
5. C St SW / Main St	E	76.5	0.94	E	76.6	0.94	E	76.5	0.94
6. C St SW / SR 18 WB Ramps	C	20.4	0.6	C	20.6	0.61	C	20.4	0.6
17. W Valley Hwy / 1st Ave N	B	15.6	0.82	B	15.4	0.82	B	15.5	0.82

1. Level of service, based on 2000 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.

Under 2040 conditions as shown in Table 4, based on the 2013 traffic counts, the 2040 conditions are forecast to operate at LOS D or better at the W Valley Highway / Main Street and C Street SW / SR 18 Westbound Ramps intersections for all scenarios. The W Valley Highway / Peasley Canyon Road and 1 C Street SW / Main Street intersections are anticipated to operate at LOS F for all scenarios using the 2013 traffic counts, consistent with the 2015 traffic counts. The W Valley Highway / 1st Avenue N intersection using the 2013 traffic counts is anticipated to operate at LOS F under No Action and Alternative 2 and LOS E under Alternative 1 compared to LOS C under all scenarios using the 2015 traffic counts. Although the intersection operations degrade at the W Valley Highway / 1st Avenue N intersection using the 2013 traffic counts, the operations are shown to operate lower under all scenarios, resulting in no impact.

Table 4. Future 2040 Conditions LOS Comparison

Study Intersection	No Action			Alternative 1			Alternative 2		
	LOS[1]	Delay[2]	V/C[3]	LOS	Delay	V/C	LOS	Delay	V/C
DEIS – (2015 Counts)									
1. W Valley Hwy S / Main St	C	27.9	0.78	C	27.9	0.78	C	28.0	0.78
4. W Valley Hwy S / Peasley Canyon Rd	F	176.2	1.40	F	176.4	1.40	F	179.6	1.42
5. C St SW / Main St	F	114.1	1.16	F	116.0	1.18	F	114.8	1.17
6. C St SW / SR 18 WB Ramps	C	24.6	0.74	C	25.8	0.76	C	24.5	0.74
17. W Valley Hwy / 1st Ave N	C	33.1	0.97	C	32.6	0.97	C	33.9	0.98
2013 Counts									
1. W Valley Hwy S / Main St	D	36.4	0.89	D	36.4	0.89	D	36.4	0.89
4. W Valley Hwy S / Peasley Canyon Rd	F	204.9	1.51	F	205.3	1.51	F	208	1.52
5. C St SW / Main St	F	198.1	1.32	F	203.9	1.33	F	200.3	1.32
6. C St SW / SR 18 WB Ramps	C	25.8	0.83	C	28	0.94	C	25.9	0.83
17. W Valley Hwy / 1st Ave N	F	80.8	1.11	E	80	1.11	F	81.9	1.12

1. Level of service, based on 2000 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.

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MEMORANDUM

Date:	May 27, 2016	**TG:**	12014.00
To:	Kevin Snyder, City of Auburn		
From:	Mike Swenson, Transpo Group		
Subject:	Future 2020 and 2040 Traffic Volumes Auburn Forecast Comparison – Response to Comment A-240		

This memorandum summarizes the results of the sensitivity analysis conducted in response to the comment received on the King County SCRTS Draft EIS by the City of Algona (Comment A-240). The comment noted that the forecasted traffic volumes for 2022 ad 2035 included in the City of Auburn Comprehensive Transportation Plan (December 14, 2015) should be compared to the forecast 2020 and 2040 traffic volumes forecast in the King County SCRTS Draft EIS. In response to the comment, this memorandum provides a comparison of the future forecasts and evaluates intersection levels of service for the 2020 and 2040 conditions based on the City of Auburn forecasts.

Traffic Volumes Comparison

The two forecasts being compared are those completed by the City of Auburn and those included in the DEIS. The two forecasts are discussed below.

Traffic Volume forecasts were prepared by the City of Auburn for the Auburn Comprehensive Transportation Plan (December 14, 2015) for 2022 and 2035. These forecasts were based on the Puget Sound Regional Council (PSRC) regional model but also includes numerous modifications such as the more accurate local street system, capacity projects, and anticipated future growth.

The 2020 and 2040 forecasts included in the DEIS were estimated based on the applying an annual background growth rate[1] of approximately 2 percent per year to the study intersections as well as distributing traffic from pipeline projects in the study area. The annual background growth rate and pipeline projects included were based on discussions with the City of Auburn and consistent with past methodology in the area.

In order to compare the City of Auburn forecasts (2022 and 2035) to the DEIS forecasts (2020 and 2040), the City of Auburn 2020 forecasts were reduced to 2020 conditions and the 2035 forecasts were grown to 2040 conditions. This was done by determining a model annual growth rate by calculating the annual growth between the 2022 and 2035 forecasts and estimating each study intersection in 2020 and 2040 conditions. The estimated 2020 and 2040 City of Auburn forecasts were then compared to the 2020 and 2040 DEIS forecasts. Table 1 below shows the comparison of the future forecast entering traffic volumes at the study intersections for the City of Auburn and the DEIS.

Table 1 shows that overall the DEIS future forecasts are approximately 1 percent higher than the City of Auburn forecasts under 2020 conditions and approximately 33 percent higher under 2040 conditions. There were 9 study intersections under 2020 conditions that the City of Auburn forecasts were higher than the DEIS and 1 study intersection under 2040 conditions. An operations analysis was conducted for the instances in which the City of Auburn forecasts showed higher volumes than the DEIS and is discussed below.

[1] Applying an annual growth rate to existing conditions to forecast future traffic volumes is a conservative and industry standard approach.

Table 1. City of Auburn and DEIS Forecast 2020 and 2040 Entering Traffic Volume Comparison

Study Intersection	Auburn Forecasts[1]		Model Annual Growth[2]	Auburn Forecasts estimated for DEIS analysis years[3]		DEIS Forecasts[4]		Difference (DEIS - Auburn Forecasts)		Percent Difference between DEIS and Auburn Forecasts	
	2022	2035		2020	2040	2020	2040	2020	2040	2020	2040
1. W Valley Hwy N / Main St	1,810	2,040	1%	1,777	2,136	1,305	1,925	-472	-211	-27%	-10%
2. W Valley Hwy N / SR 18 WB Ramps	1,925	1,960	0%	1,920	1,974	1,660	2,455	-260	481	-14%	24%
3. W Valley Hwy N / SR 18 EB Ramps	2,445	2,545	0%	2,430	2,585	2,540	3,755	110	1,170	5%	45%
4. W Valley Hwy N / Peasley Canyon Rd	3,350	3,395	0%	3,343	3,412	3,370	4,980	27	1,568	1%	46%
5. C St SW / Main St	2,400	2,620	1%	2,368	2,710	1,855	2,745	-513	35	-22%	1%
6. C St SW / SR 18 WB Ramps	2,280	2,115	-1%	2,307	2,055	2,045	3,020	-262	965	-11%	47%
7. C St SW / SR 18 EB Ramps	2,955	3,140	0%	2,928	3,214	2,880	4,255	-48	1,041	-2%	32%
8. C St SW / 8th St SW	2,685	2,815	0%	2,666	2,867	2,450	3,625	-216	758	-8%	26%
9. W Valley Hwy / 15th St SW	3,095	2,840	-1%	3,136	2,748	3,030	4,495	-106	1,747	-3%	64%
10. SR 167 SB Ramps / 15th St SW	2,020	2,440	1%	1,962	2,624	2,450	3,615	488	991	25%	38%
11. SR 167 NB Ramps / 15th St SW	1,840	3,080	4%	1,700	3,755	2,620	3,885	920	130	54%	3%
12. O St / 15th St SW	1,915	2,545	2%	1,833	2,839	2,425	3,585	592	746	32%	26%
13. Market St / 15th St SW	1,070	1,460	2%	1,020	1,645	1,300	1,925	280	280	27%	17%
14. Supermall Way / 15th St SW	2,055	2,230	1%	2,029	2,301	2,335	3,460	306	1,159	15%	50%
15. Perimeter Rd / 15th St SW	2,000	2,115	0%	1,983	2,161	2,270	3,360	287	1,199	14%	55%
16. C St SW / 15th St SW	2,820	2,920	0%	2,805	2,959	2,945	4,365	140	1,406	5%	47%
17. W Valley Hwy / 1st Ave N	-[5]	-	-	-	-	-	-	-	-	-	-
18. W Valley Hwy / Ellingson Rd	-	-	-	-	-	-	-	-	-	-	-
19. SR 167 SB Ramps / Ellingson Rd	-	-	-	-	-	-	-	-	-	-	-
20. SR 167 NB Ramps / Ellingson Rd	-	-	-	-	-	-	-	-	-	-	-
21. C St SW / GSA Access	2,205	2,205	0%	2,205	2,205	1,520	2,260	-685	55	-31%	2%
22. C St SW / Safeway Access	1,410	1,410	0%	1,410	1,410	1,490	2,215	80	805	6%	57%
23. C St SW / Ellingson Rd	2,960	2,825	0%	2,981	2,775	2,875	4,280	-106	1,505	-4%	54%
Total	**43,240**	**46,700**	**1%**	**42,365**	**48,375**	**43,365**	**64,205**	**563**	**15,830**	**1%**	**33%**

Note: The shaded study intersections are those where the City of Auburn forecast was found to have larger traffic volumes than the forecast volumes from the DEIS for at least one of the future analysis years.

1. City of Auburn forecasts from the Auburn Comprehensive Transportation Plan (December 14, 2015).
2. Model annual growth calculated based on the annual growth between the 2022 and 2035 City of Auburn forecasts.
3. City of Auburn forecasts estimated for the DEIS analysis years (2020 and 2040) based on the calculated model annual growth rate, reducing the 2022 forecasts to 2020 and growing the 2035 forecasts to 2040.
4. The DEIS forecasts are from the King County SCRTS Draft EIS.
5. "-" = study intersections not located with the City of Auburn.

Traffic Operations

The 9 study intersections under 2020 conditions and the 1 intersection under 2040 conditions with higher traffic volumes with the City of Auburn forecasts were analyzed consistent with the methodology described in the DEIS for future No Action, Alternative 1, and Alternative 2. The future 2020 and 2040 operations are shown in Tables 2 and 3, respectively.

Table 2. Future 2020 Conditions LOS Comparison

	No Action			Alternative 1			Alternative 2		
Study Intersection	**LOS[1]**	**Delay[2]**	**V/C[3]**	**LOS**	**Delay**	**V/C**	**LOS**	**Delay**	**V/C**
DEIS Forecasts									
1. W Valley Hwy S / Main St	C	20.8	0.56	C	20.9	0.56	C	20.8	0.56
2. W Valley Hwy S / SR 18 WB Ramps	B	12.0	0.56	B	12.0	0.56	B	12.1	0.56
5. C St SW / Main St	D	36.4	0.85	D	36.5	0.86	D	36.3	0.85
6. C St SW / SR 18 WB Ramps	B	19.3	0.51	B	19.6	0.51	B	19.3	0.51
7. C St SW / SR 18 EB Ramps	C	31.6	0.93	C	32.1	0.94	C	31.6	0.93
8. C St SW / 8th St SW	A	6.1	0.60	A	7.0	0.62	A	6.2	0.60
9. W Valley Hwy / 15th St SW	C	20.1	0.84	B	19.8	0.83	C	20.3	0.84
21. C St SW / GSA Access	A	5.0	0.50	A	5.0	0.50	A	5.0	0.50
23. C St SW / Ellingson Rd	D	37.8	0.83	D	38.0	0.83	D	37.8	0.83
City of Auburn Forecasts									
1. W Valley Hwy S / Main St	C	32.2	0.74	C	32.1	0.74	C	32.2	0.74
2. W Valley Hwy S / SR 18 WB Ramps	B	10.3	0.48	B	10.3	0.48	B	10.3	0.48
5. C St SW / Main St	F	101.2	1.01	F	101.5	1.01	F	101.3	1.01
6. C St SW / SR 18 WB Ramps	C	21.7	0.56	C	22	0.56	C	21.7	0.56
7. C St SW / SR 18 EB Ramps	C	20.1	0.85	C	20.4	0.85	C	20.1	0.85
8. C St SW / 8th St SW	A	6.6	0.58	A	8.3	0.61	A	6.7	0.58
9. W Valley Hwy / 15th St SW	D	53.9	0.95	D	52.7	0.94	D	54.3	0.96
21. C St SW / GSA Access	A	2.4	0.49	A	2.4	0.49	A	2.4	0.49
23. C St SW / Ellingson Rd	D	48.3	0.84	D	48.4	0.84	D	48.4	0.84

1. Level of service, based on 2000 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.

Under 2020 conditions as shown in Table 2, consistent with the DEIS forecasts, study intersections using the City of Auburn forecasts are anticipated to operate at LOS D or better for the No Action, Alternative 1, and Alternative 2 conditions with the exception of the C Street SE / Main Street intersection. This intersection is anticipated to operate at LOS F using the City of Auburn forecasts rather than LOS D as shown in the DEIS. Although the intersection is anticpated to operate at LOS F, it is shown to add less than 1 second of delay between No Action and Alternatives 1 and 2, and as such there is no resulting impact.

Table 3. Future 2040 Conditions LOS Comparison

	No Action			Alternative 1			Alternative 2		
Study Intersection	**LOS[1]**	**Delay[2]**	**V/C[3]**	**LOS**	**Delay**	**V/C**	**LOS**	**Delay**	**V/C**
DEIS Forecasts									
1. W Valley Hwy S / Main St	C	27.9	0.78	C	27.9	0.78	C	28.0	0.78
City of Auburn Forecasts									
1. W Valley Hwy S / Main St	D	46.1	0.83	D	46.1	0.83	D	45.9	0.83

1. Level of service, based on 2000 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.

Table 3 shows under 2020 conditions, the W Valley Highway / Main Street intersection is anticipated to degrade from LOS C as shown in the DEIS to LOS D with the City of Auburn

forecasts, but still meets an acceptable level of service with less than 1 second change in delay between No Action and Alternatives 1 and 2.

Site Vicinity and Study Intersections

FIGURE

E-1

King County South Transfer Station

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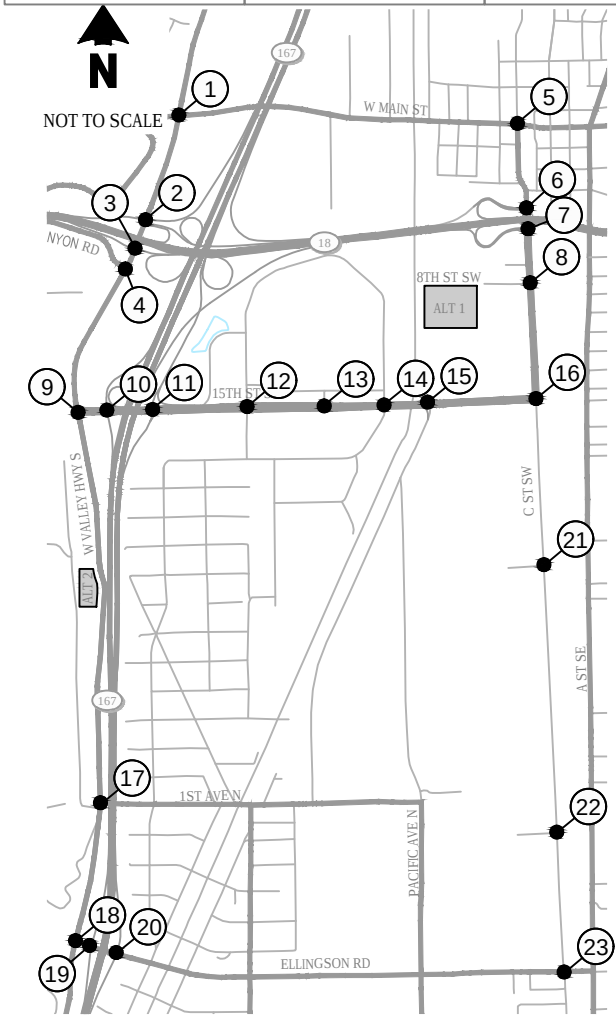


1 W VALLEY HWY N / MAIN ST
510 | 10 | 120 | 10 | 45 | 45 | 50 | 10 | 95 | 20 | 85 | 145

2 W VALLEY HWY N / SR 18 WB RAMPS
505 | 100 | 30 | 260 | 220 | 375

3 W VALLEY HWY N / SR 18 EB RAMPS
720 | 50 | 95 | 5 | 595 | 305 | 505

4 W VALLEY HWY N / PEASLEY CANYON RD
1,035 | 300 | 320 | 500 | 390 | 475

5 C ST SW / MAIN ST
525 | 15 | 100 | 25 | 20 | 190 | 105 | 50 | 285 | 70 | 115 | 135

6 C ST SW / SR 18 WB RAMPS
820 | 235 | 5 | 25 | 5 | 5 | 5 | 250 | 35 | 195 | 10 | 215

7 C ST SW / SR 18 EB RAMPS
1,075 | 115 | 295 | 145 | 245 | 695

8 C ST SW / 8TH ST SW
1,170 | 75 | 65 | 15 | 10 | 860

9 W VALLEY HWY / 15TH ST SW
835 | 730 | 745 | 210 | 55 | 150

10 SR 167 SB RAMPS / 15TH ST SW
5 | 165 | 295 | 150 | 555 | 785 | 230

11 SR 167 NB RAMPS / 15TH ST SW
15 | 360 | 840 | 605 | 310 | 205 | 5

12 O ST / 15TH ST SW
95 | 380 | 75 | 295 | 55 | 350 | 360 | 200 | 40 | 210 | 15 | 75

13 MARKET ST / 15TH ST SW
5 | 90 | 100 | 80 | 110 | 360 | 305 | 5 | 0 | 65 | 15 | 5

14 OUTLET COLLECTION DR / 15TH ST SW
55 | 100 | 395 | 65 | 440 | 420 | 300 | 15 | 150 | 15 | 105 | 35

15 PERIMETER RD / 15TH ST SW
840 | 775 | 95 | 95 | 110 | 120

16 C ST SW / 15TH ST SW
535 | 655 | 660 | 395 | 210 | 185

17 W VALLEY HWY / 1ST AVE N
920 | 10 | 100 | 5 | 30 | 5 | 5 | 5 | 10 | 5 | 5 | 85

18 W VALLEY HWY / ELLINGSON RD
515 | 415 | 55 | 50 | 40 | 20

19 SR 167 SB RAMPS / ELLINGSON RD
5 | 30 | 230 | 270 | 75 | 165 | 370

20 SR 167 NB RAMPS / ELLINGSON RD
10 | 475 | 285 | 440 | 5 | 215 | 5

21 C ST SW / GSA ACCESS
905 | 5 | 65 | 70 | 0 | 325

22 C ST SW / SAFEWAY ACCESS
1,005 | 10 | 5 | 5 | 5 | 310

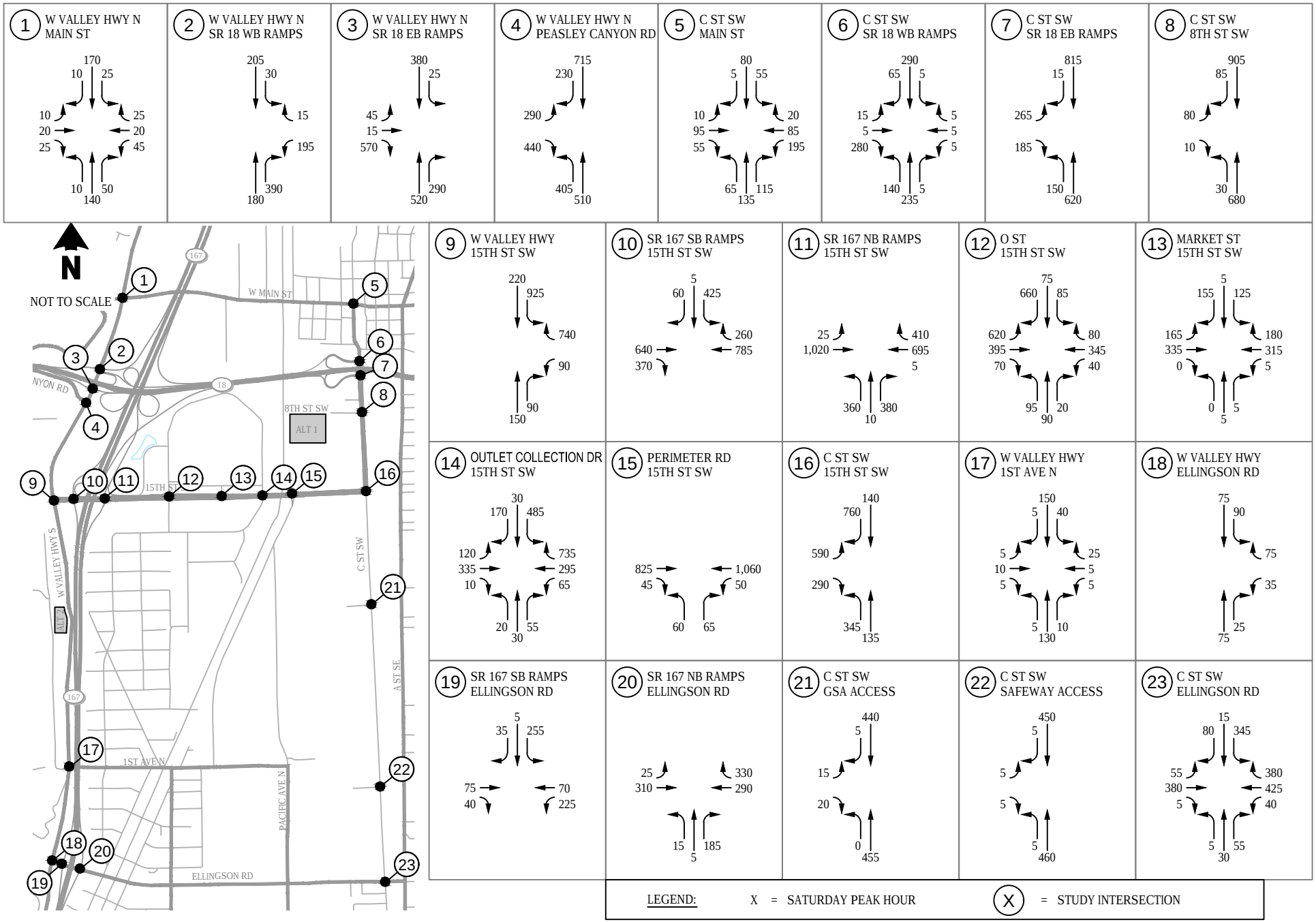
23 C ST SW / ELLINGSON RD
10 | 395 | 570 | 60 | 230 | 765 | 445 | 5 | 5 | 5 | 75 | 30

LEGEND: X = WEEKDAY PM PEAK HOUR (X) = STUDY INTERSECTION

Existing Weekday PM Peak Hour Traffic Volumes

FIGURE **E-2**

King County South Transfer Station



Existing Saturday Peak Hour Traffic Volumes

FIGURE **E-3**

King County South Transfer Station

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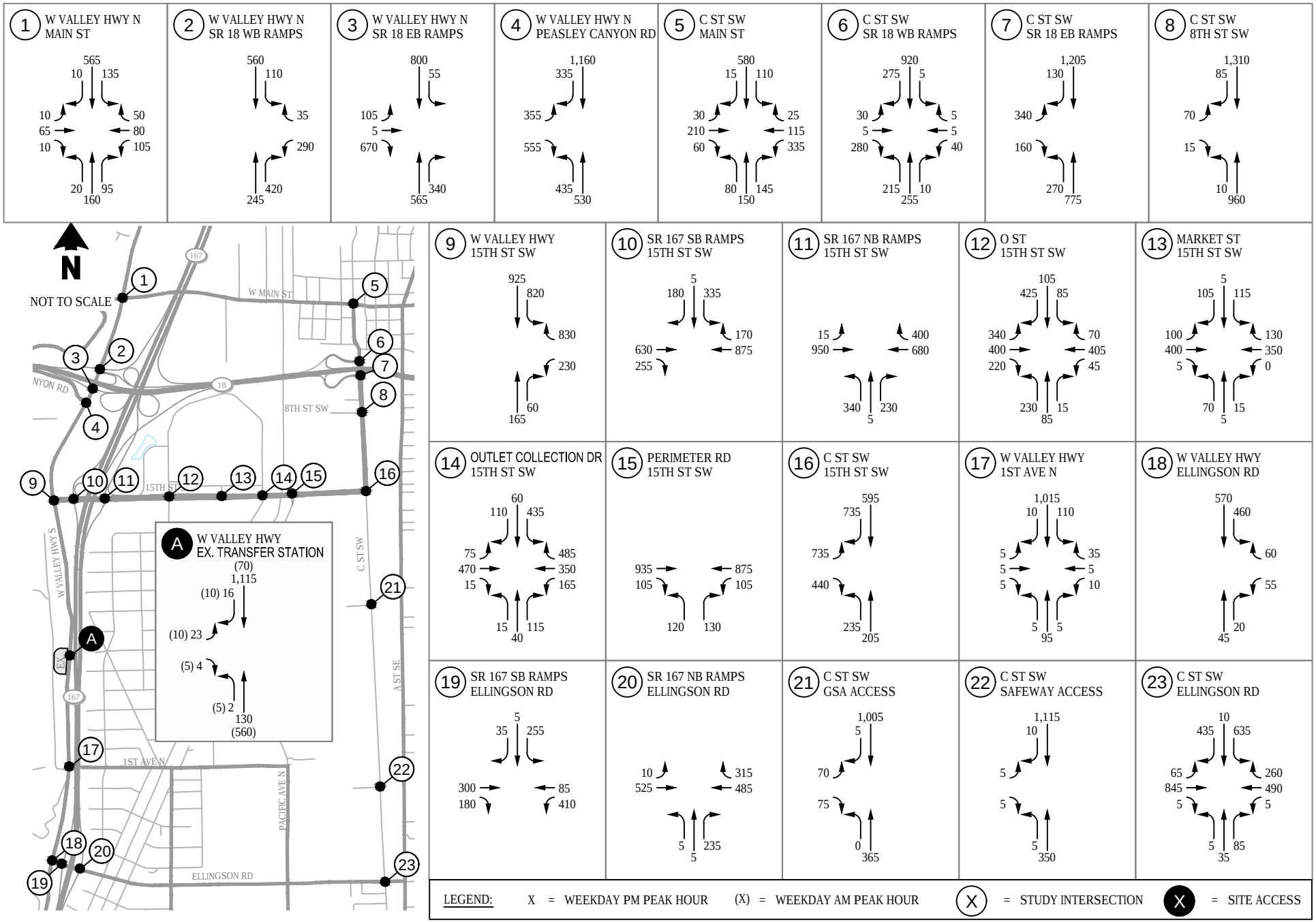

No Action 2020 Weekday Peak Hour Traffic Volumes

FIGURE **E-4**

King County South Transfer Station

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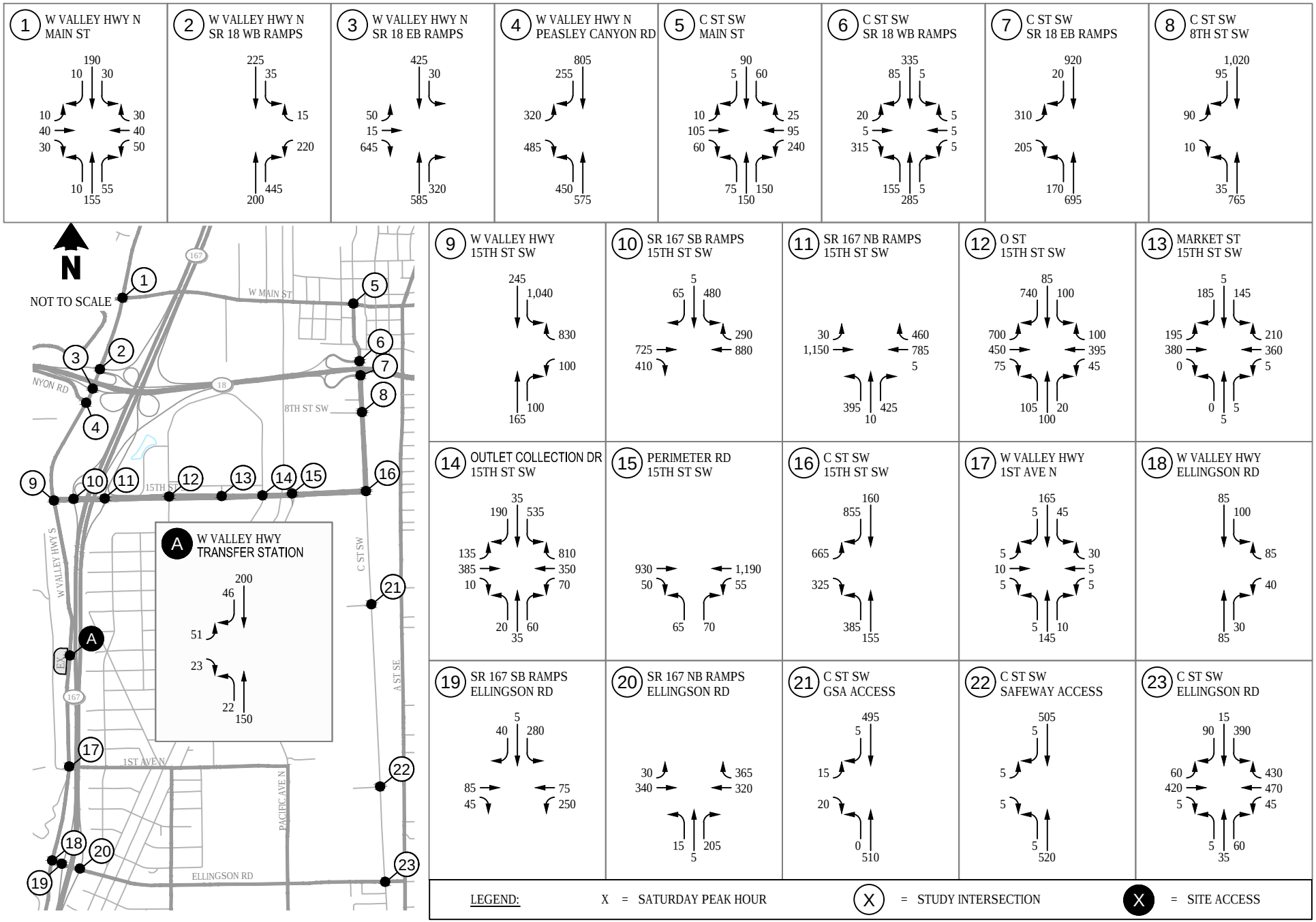
transpogroup WHAT TRANSPORTATION CAN BE.



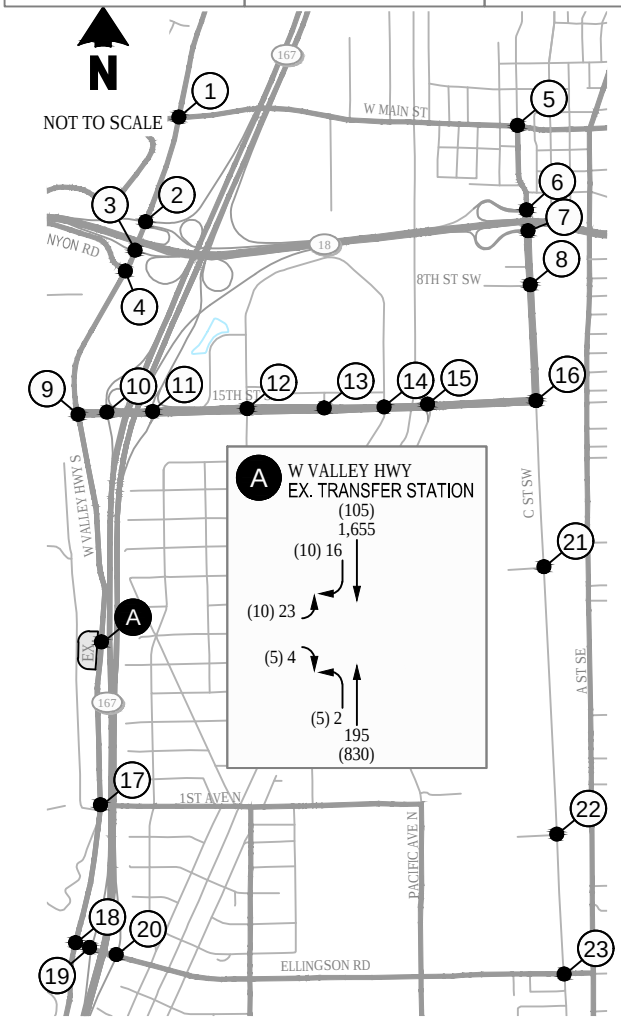
No Action 2020 Saturday Peak Hour Traffic Volumes

FIGURE **E-5**

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <NA_Sat_2020> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



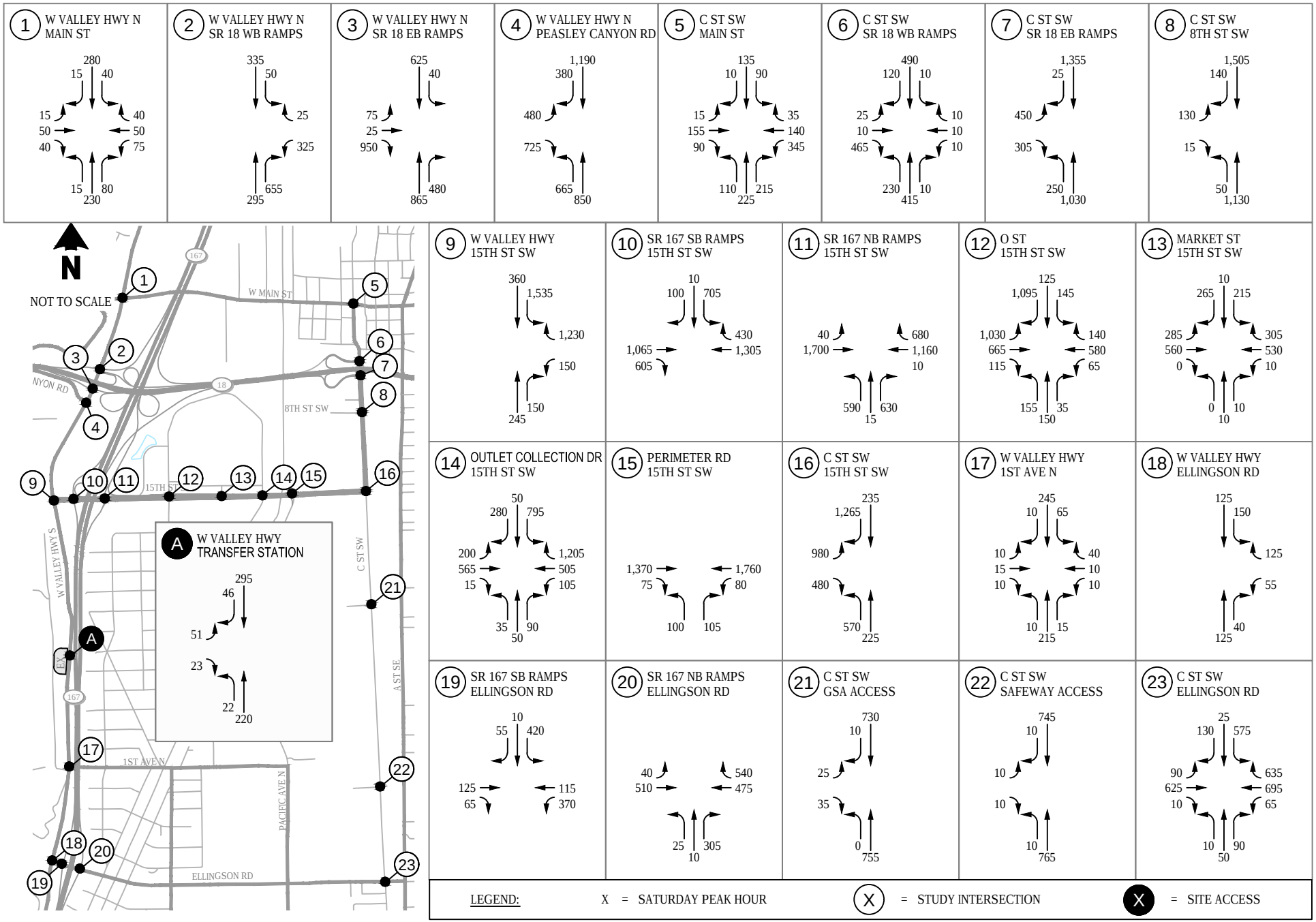
No Action 2040 Weekday Peak Hour Traffic Volumes

FIGURE **E-6**

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <NA_Weekday_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



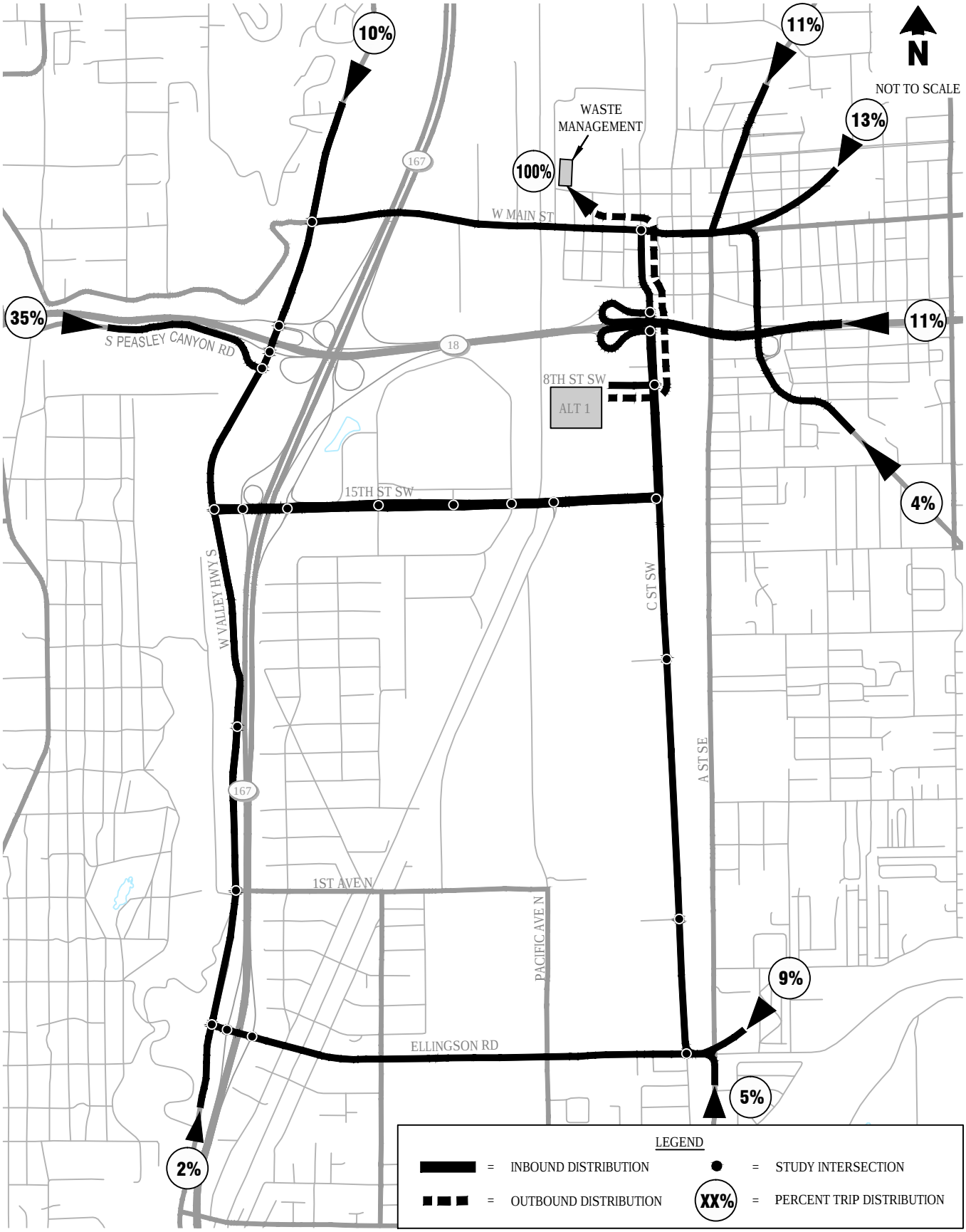
No Action 2040 Saturday Peak Hour Traffic Volumes

FIGURE **E-7**

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <NA_Sat_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



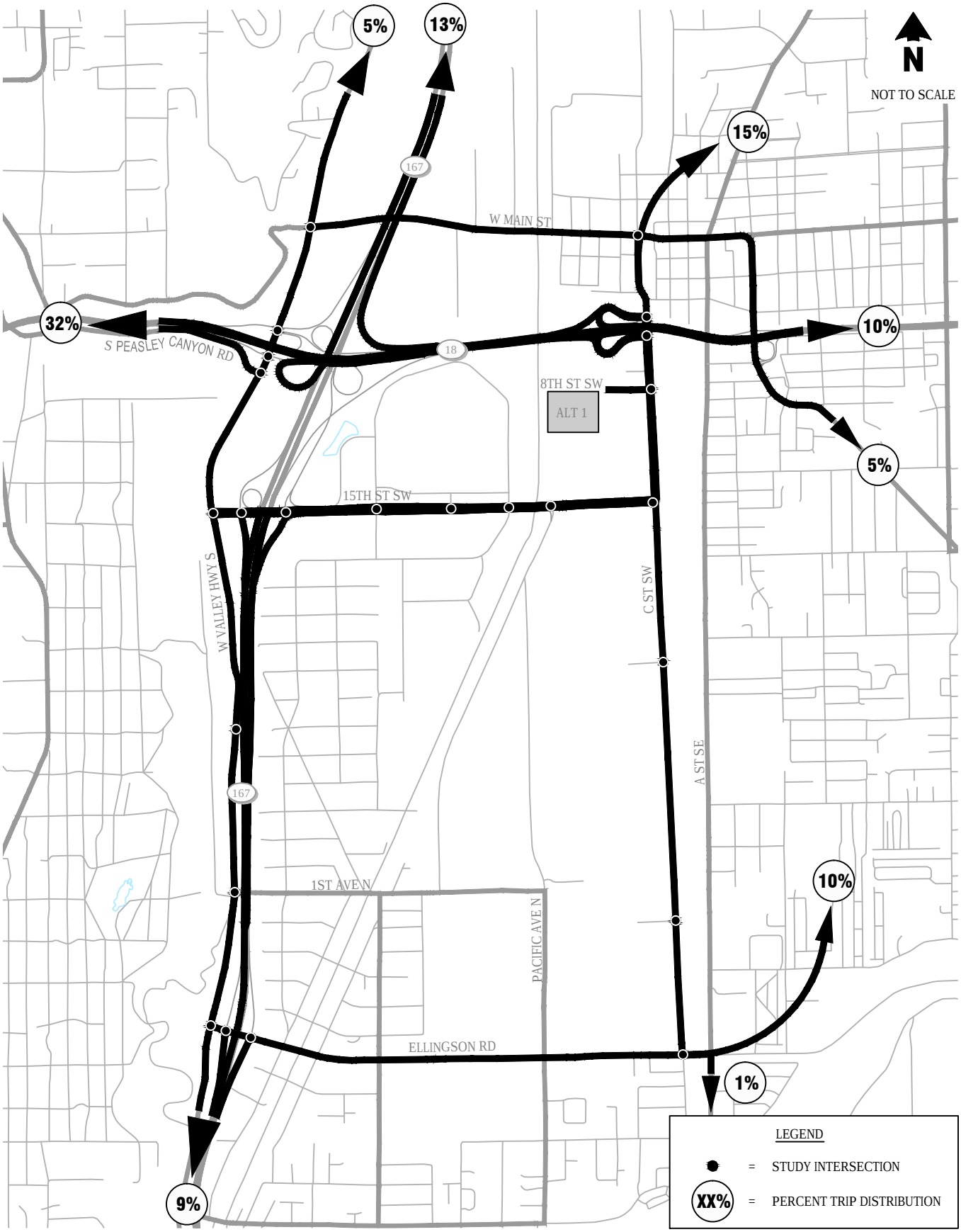
Alternative 1 - Commercial Haul Trip Distribution

FIGURE **E-8**

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt1_CH> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



Alternative 1 - Self Haul Trip Distribution

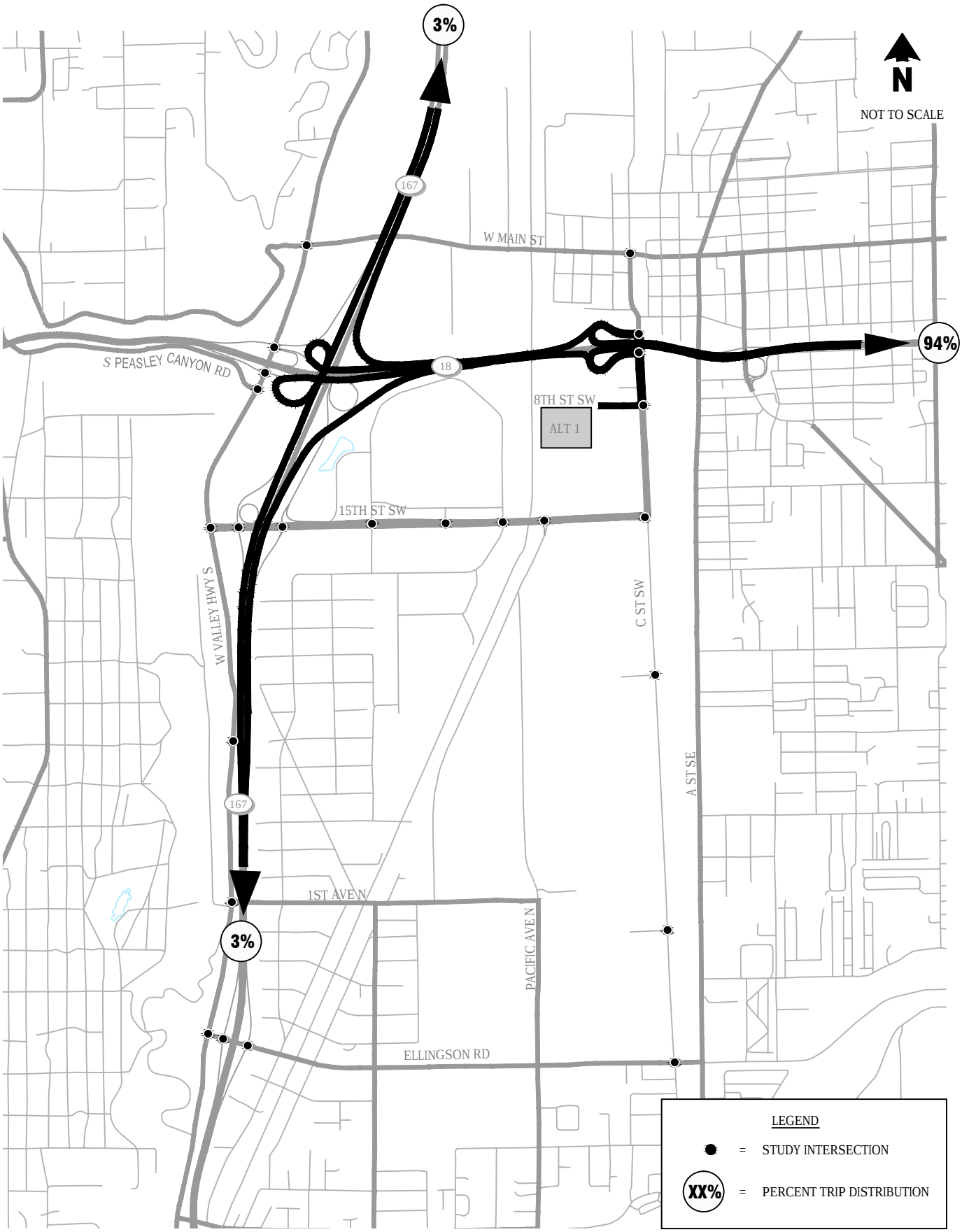
FIGURE

E-9

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt1_SH> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



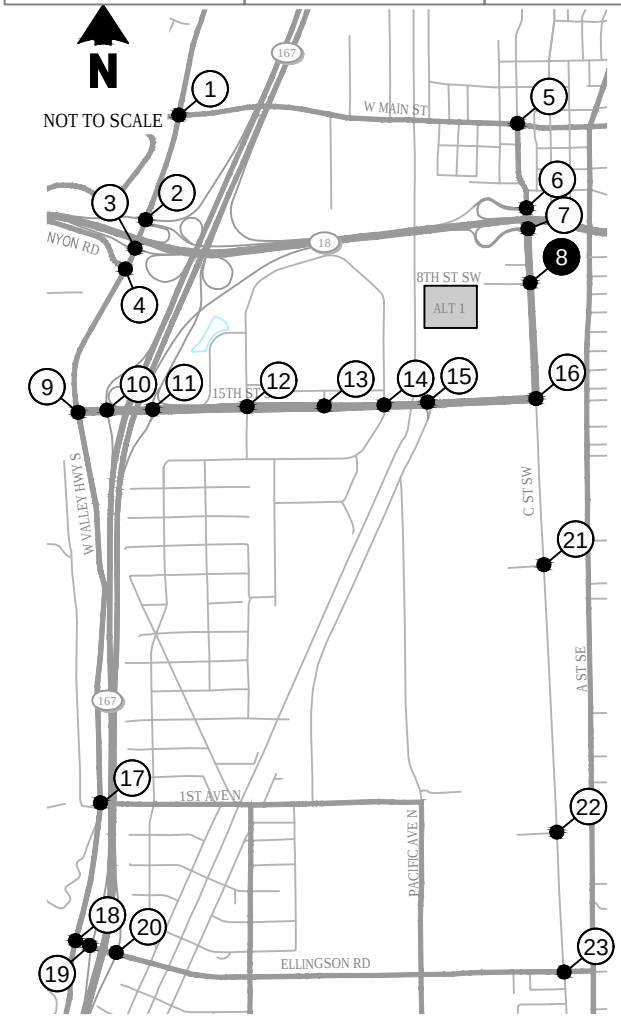
Alternative 1 - Transfer Trailers & Recyclables Trip Distribution

FIGURE **E-10**

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt1_HA> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



Alternative 1 2020 Weekday Peak Hour Trip Assignment

FIGURE

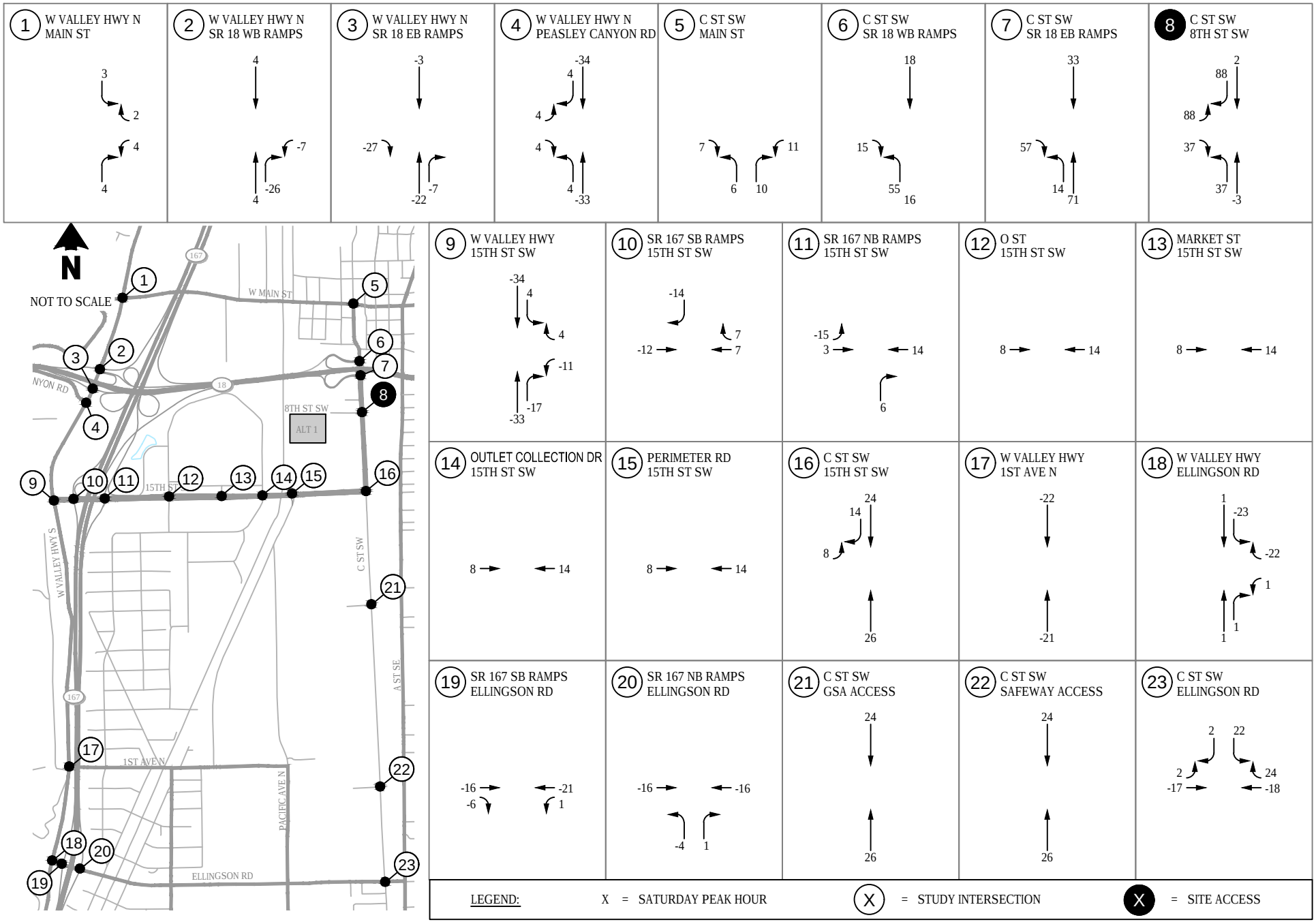
E-11

King County South Transfer Station

transpogroup

WHAT TRANSPORTATION CAN BE.

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Weekday_2020_assign> walkerc 05/21/15 09:57



Alternative 1 2020 Saturday Peak Hour Trip Assignment

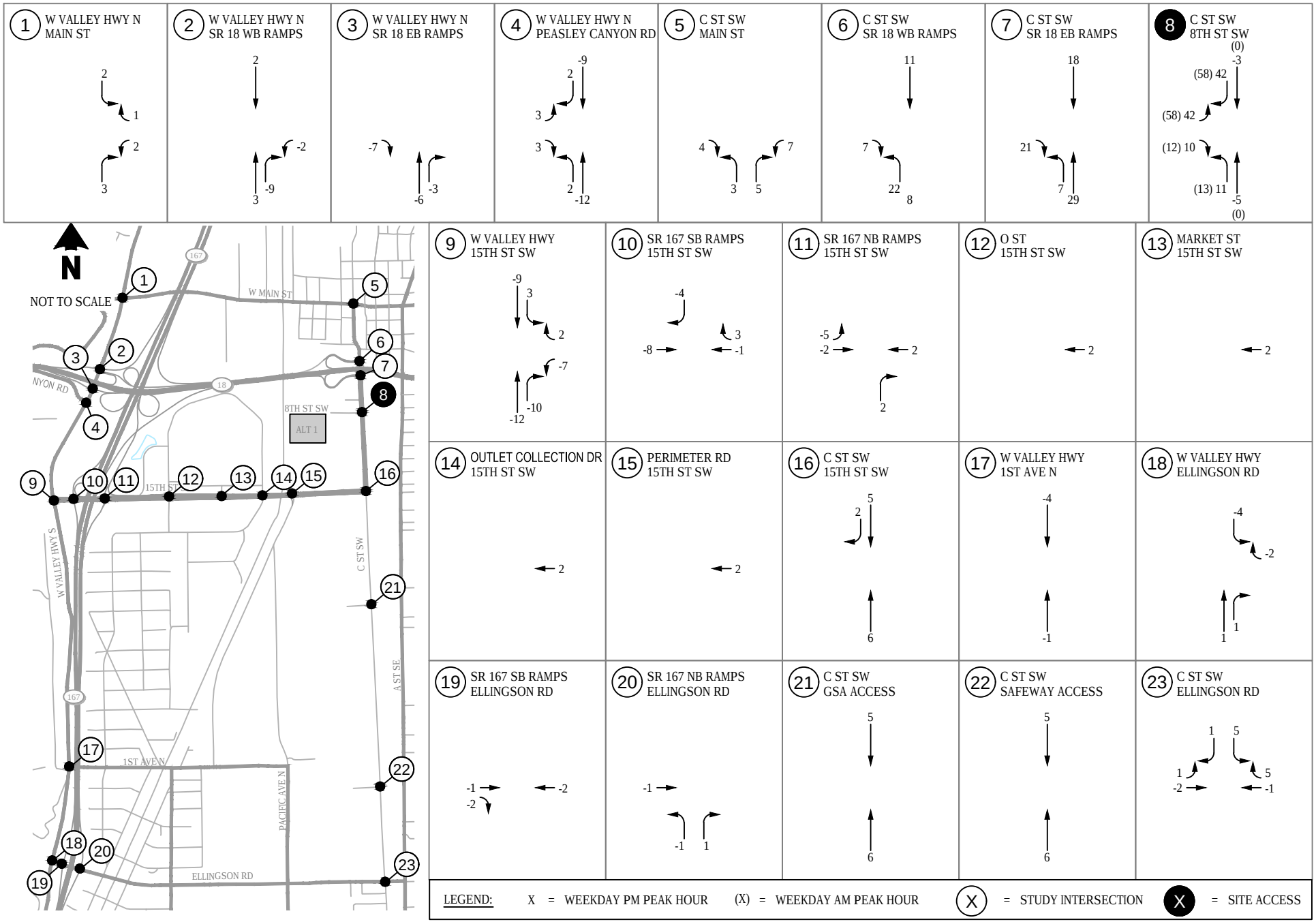
FIGURE

E-13

King County South Transfer Station

transpogroup WHAT TRANSPORTATION CAN BE.

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Sat_2020_assign> walkerc 05/21/15 09:57



Alternative 1 2040 Weekday Peak Hour Trip Assignment

FIGURE

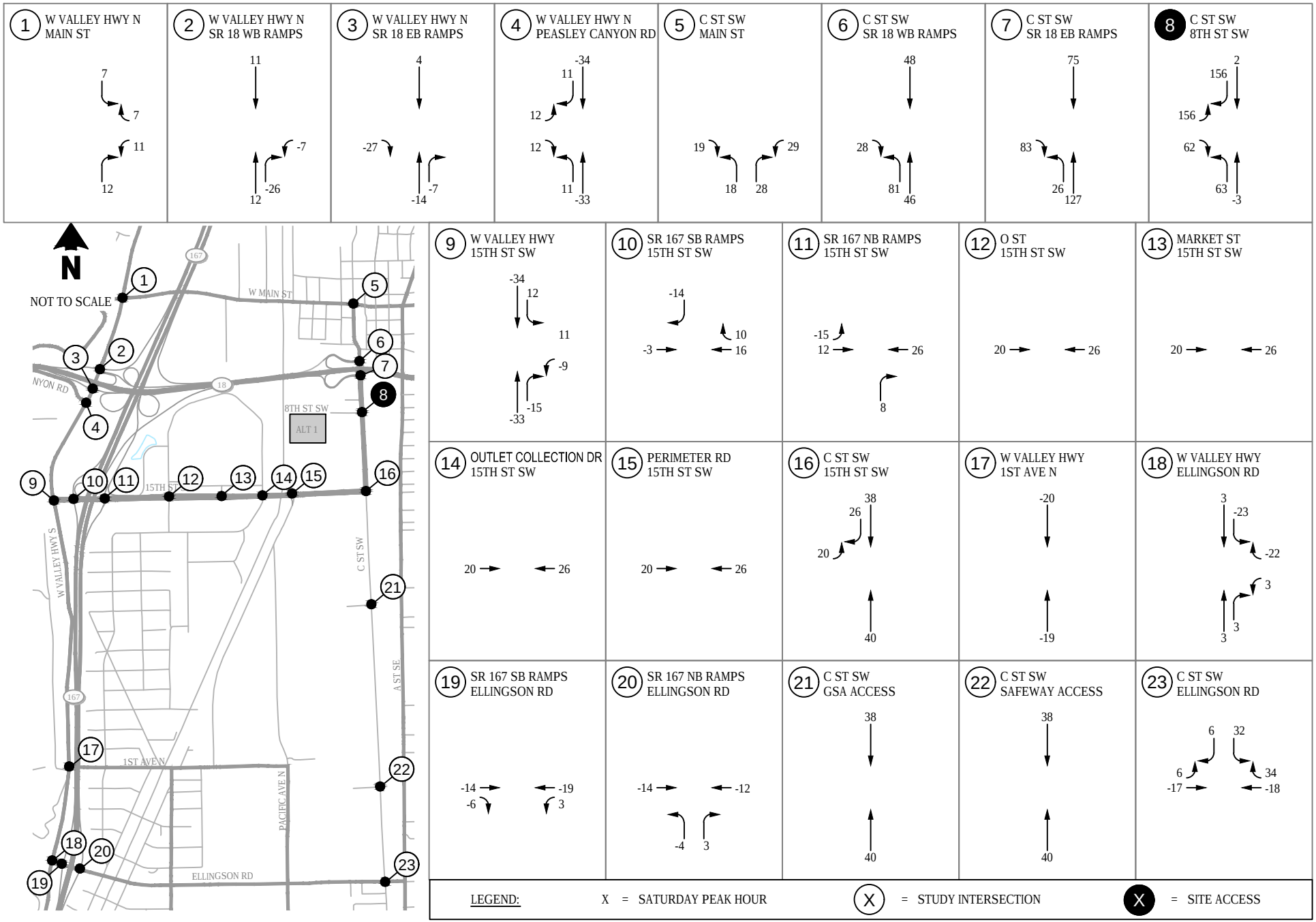
E-13

King County South Transfer Station

transpogroup

WHAT TRANSPORTATION CAN BE.

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Weekday_2040_assign> walkerc 05/21/15 09:57



Alternative 1 2040 Saturday Peak Hour Trip Assignment

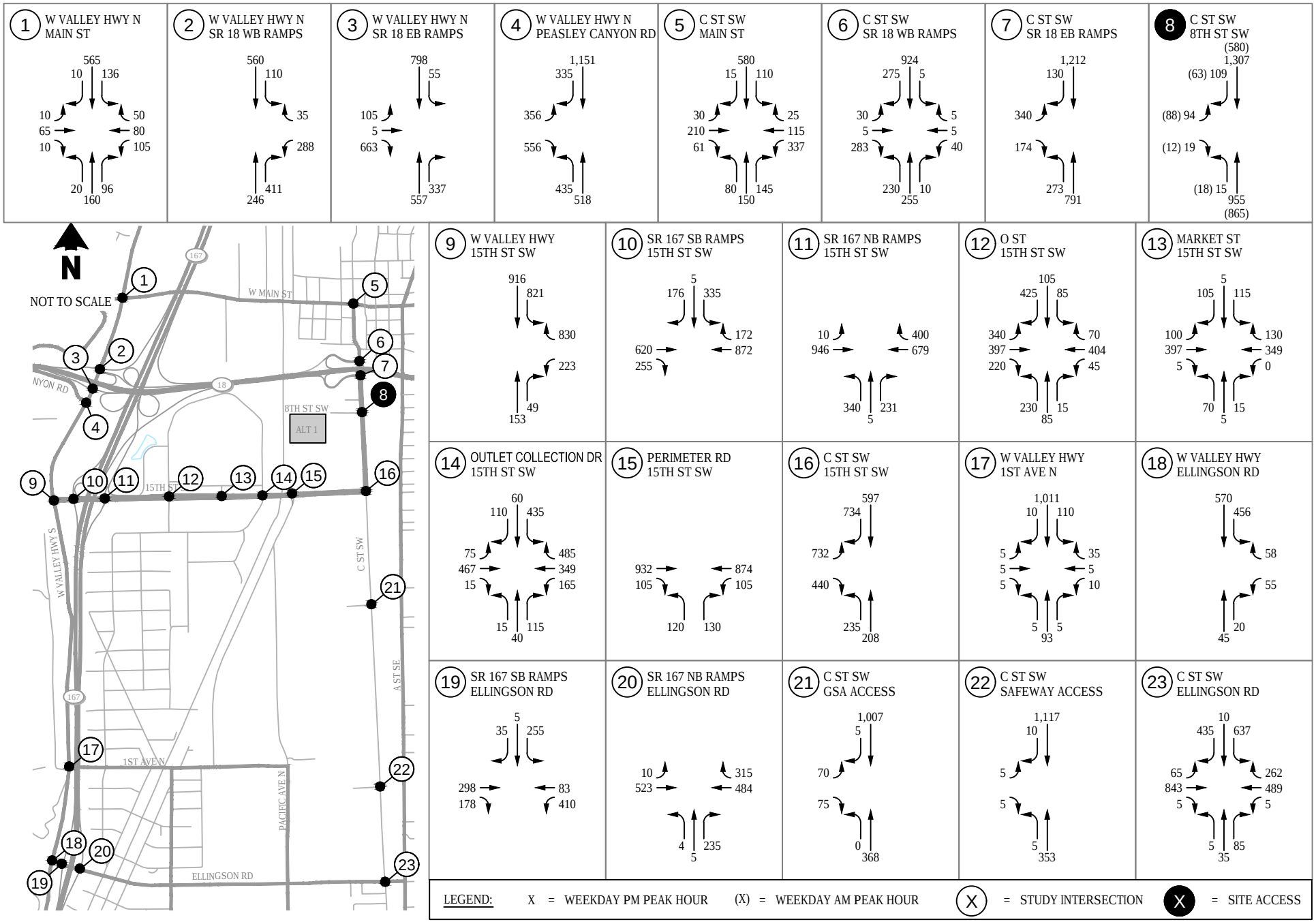
FIGURE

E-14

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Sat_2040_assign> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 1 2020 Weekday Peak Hour Traffic Volumes

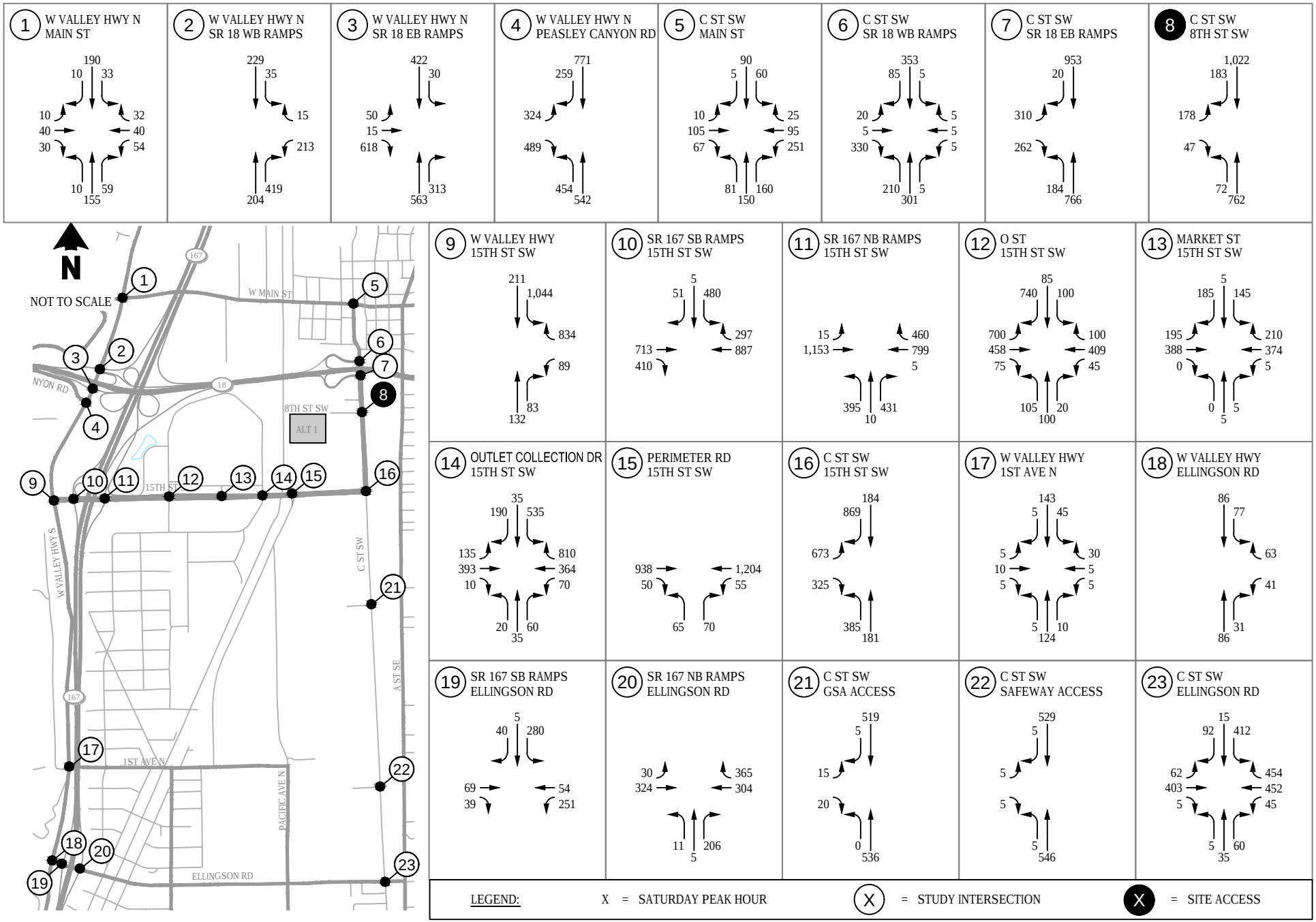
FIGURE

E-15

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Weekday_2020> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 1 2020 Saturday Peak Hour Traffic Volumes

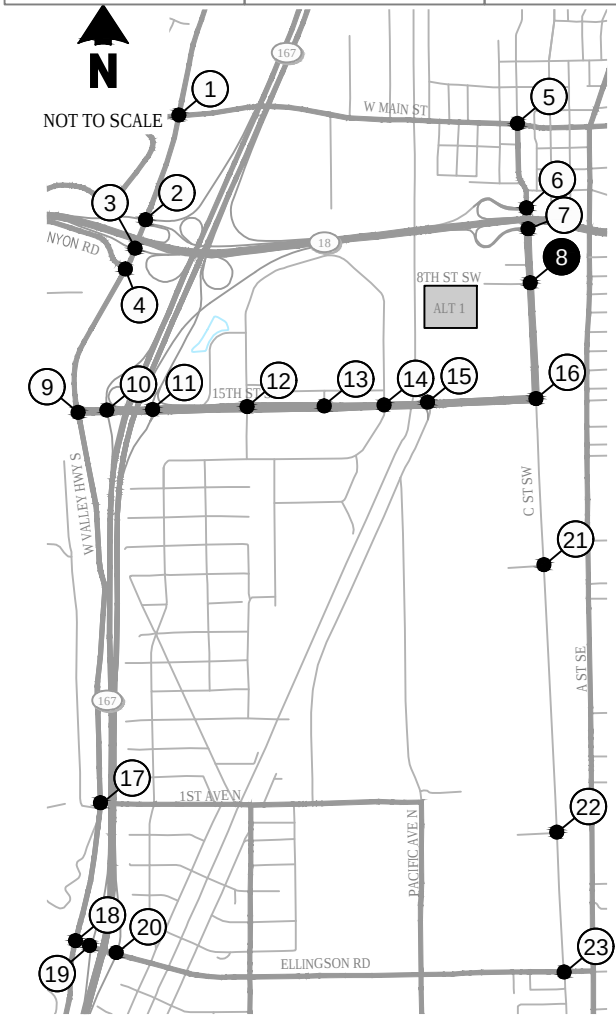
FIGURE

E-16

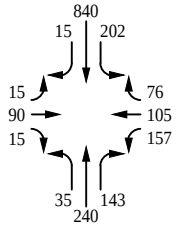
King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Saturday_2020> walkerc 05/21/15 09:57

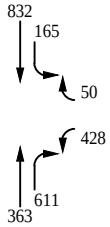
transpogroup
WHAT TRANSPORTATION CAN BE.



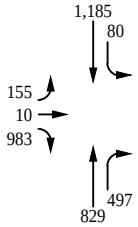
1 W VALLEY HWY N / MAIN ST



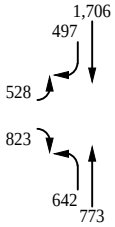
2 W VALLEY HWY N / SR 18 WB RAMPS



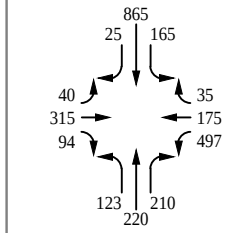
3 W VALLEY HWY N / SR 18 EB RAMPS



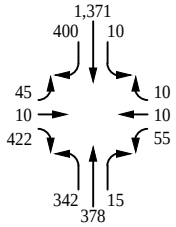
4 W VALLEY HWY N / PEASLEY CANYON RD



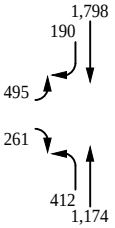
5 C ST SW / MAIN ST



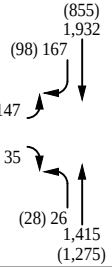
6 C ST SW / SR 18 WB RAMPS



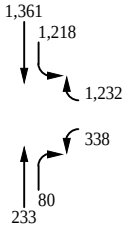
7 C ST SW / SR 18 EB RAMPS



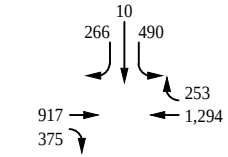
8 C ST SW / 8TH ST SW



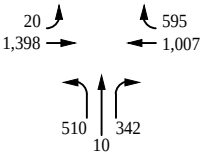
9 W VALLEY HWY / 15TH ST SW



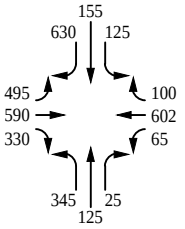
10 SR 167 SB RAMPS / 15TH ST SW



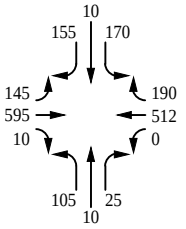
11 SR 167 NB RAMPS / 15TH ST SW



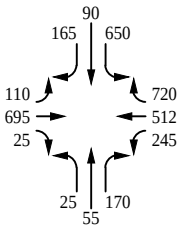
12 O ST / 15TH ST SW



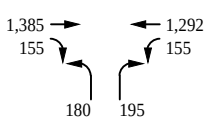
13 MARKET ST / 15TH ST SW



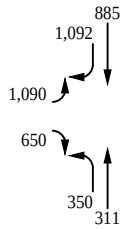
14 OUTLET COLLECTION DR / 15TH ST SW



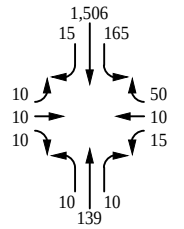
15 PERIMETER RD / 15TH ST SW



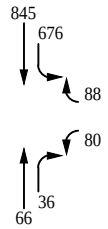
16 C ST SW / 15TH ST SW



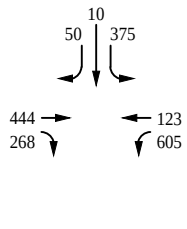
17 W VALLEY HWY / 1ST AVE N



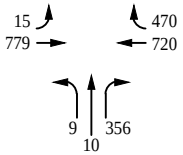
18 W VALLEY HWY / ELLINGSON RD



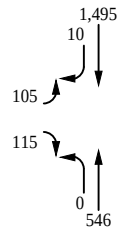
19 SR 167 SB RAMPS / ELLINGSON RD



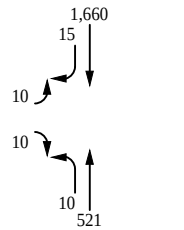
20 SR 167 NB RAMPS / ELLINGSON RD



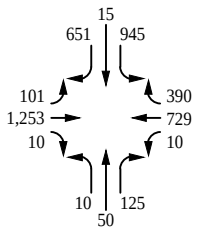
21 C ST SW / GSA ACCESS



22 C ST SW / SAFEWAY ACCESS



23 C ST SW / ELLINGSON RD



LEGEND: X = WEEKDAY PM PEAK HOUR (X) = WEEKDAY AM PEAK HOUR (X) = STUDY INTERSECTION (X) = SITE ACCESS

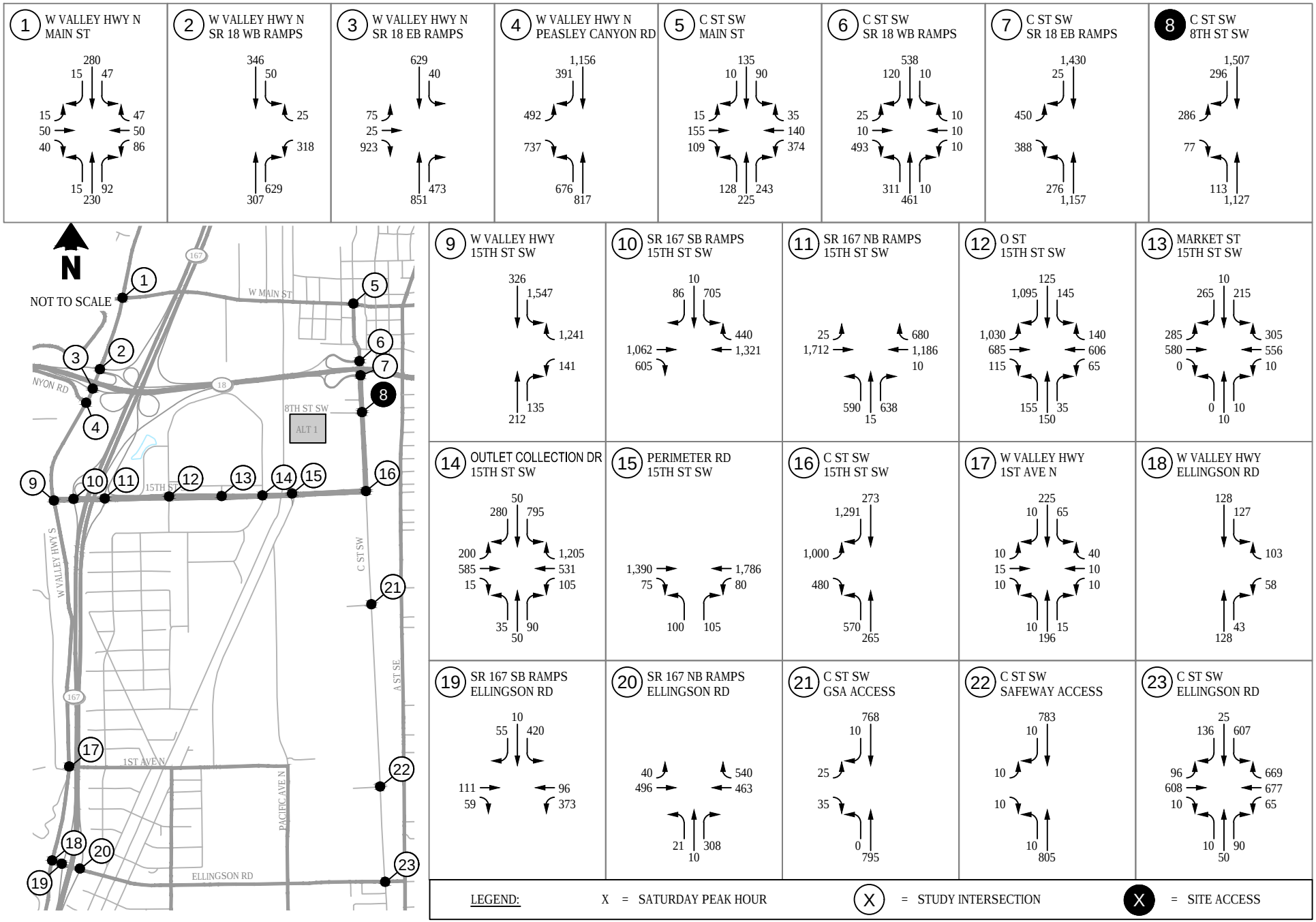
Alternative 1 2040 Weekday Peak Hour Traffic Volumes

FIGURE E-17

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Weekday_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 1 2040 Saturday Peak Hour Traffic Volumes

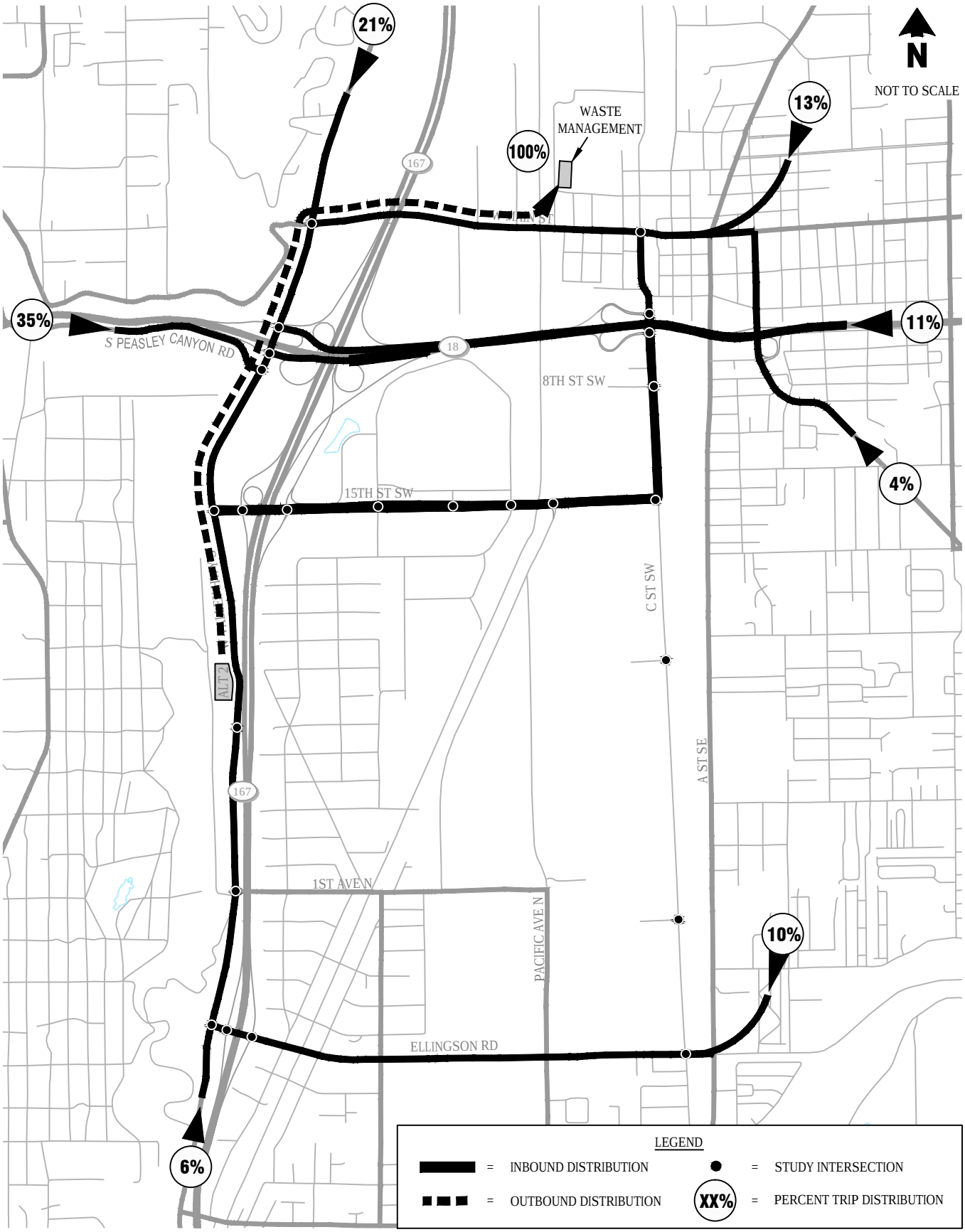
FIGURE

E-18

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 1_Saturday_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



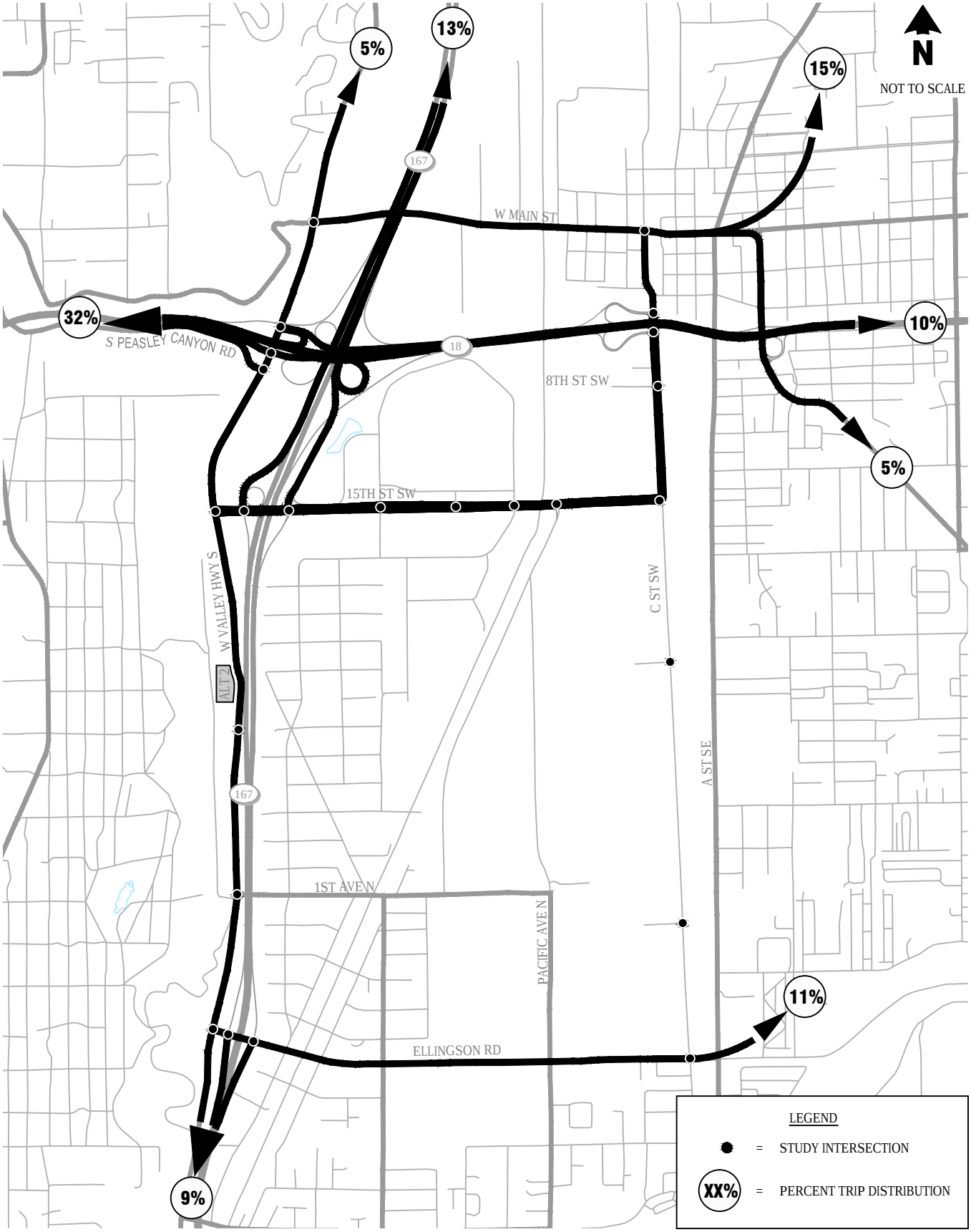
Alternative 2 - Commercial Haul Trip Distribution

King County South Transfer Station

FIGURE
E-19

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt2_CH> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



Alternative 2 - Self Haul Trip Distribution

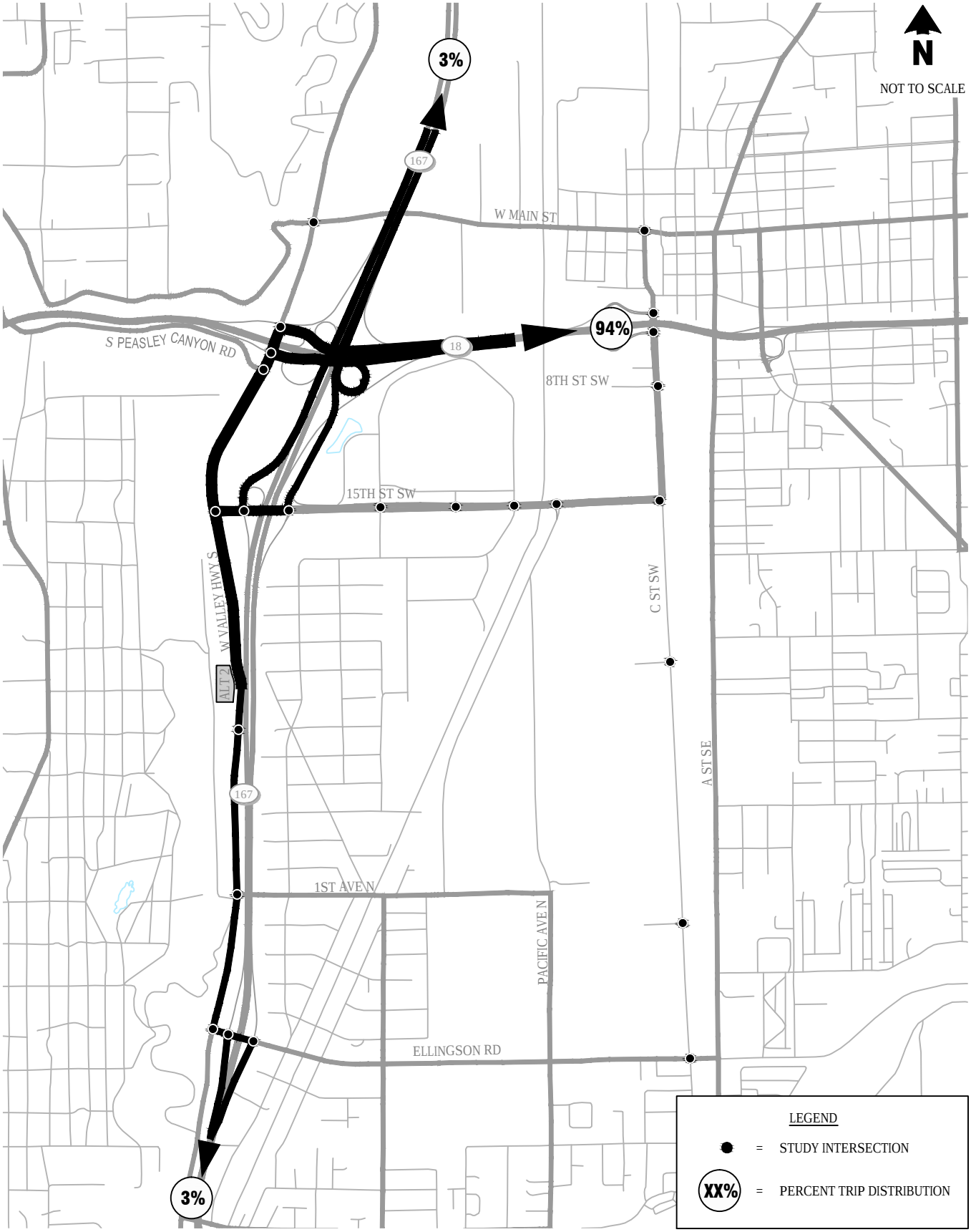
King County South Transfer Station

FIGURE

E-20

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt2_SH> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



Alternative 2 - Transfer Trailers & Recyclables Trip Distribution

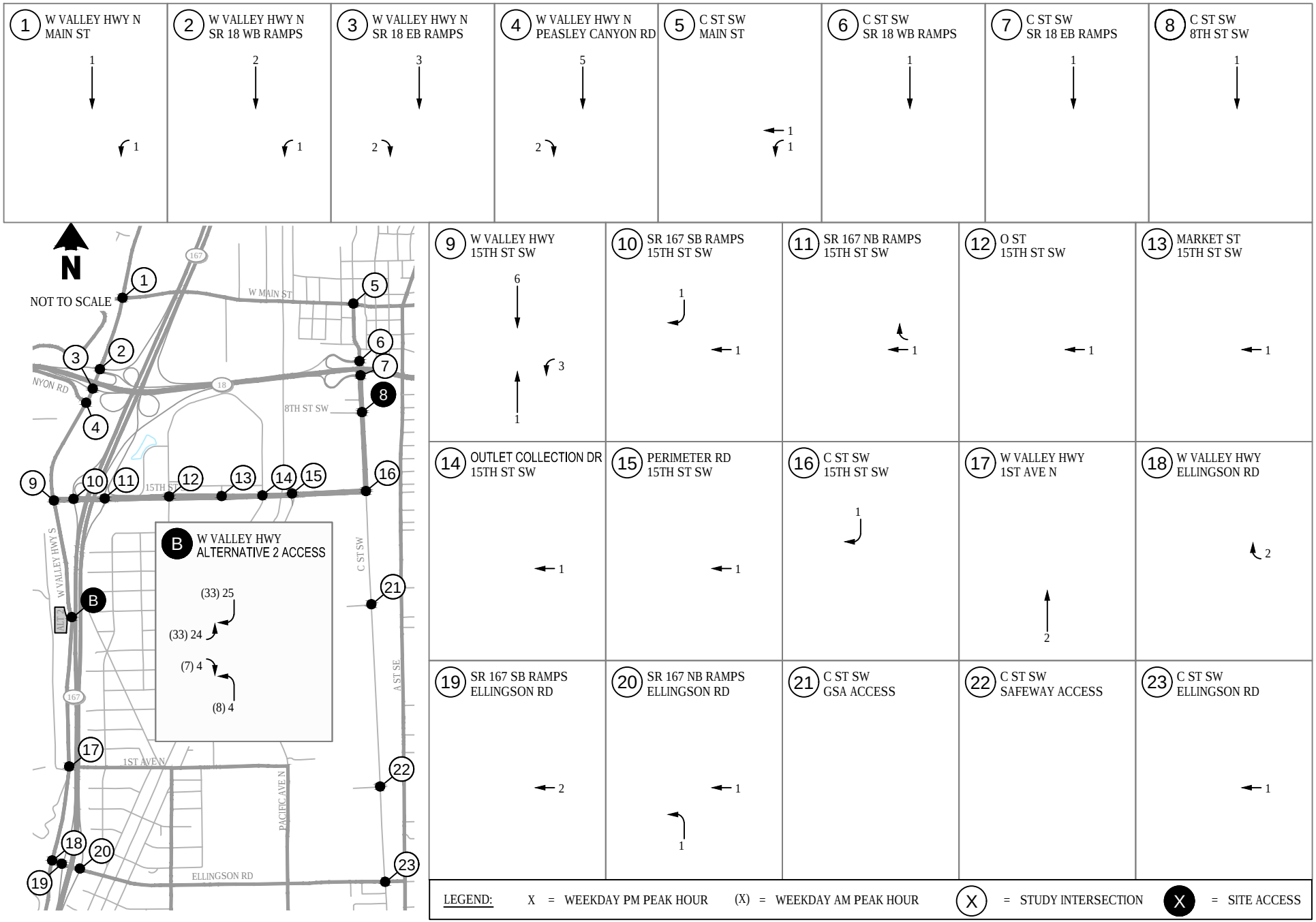
FIGURE

E-21

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt2_HA> walkerc 05/21/15 09:57

transpogroup
WHAT TRANSPORTATION CAN BE.



Alternative 2 2020 Weekday Peak Hour Trip Assignment

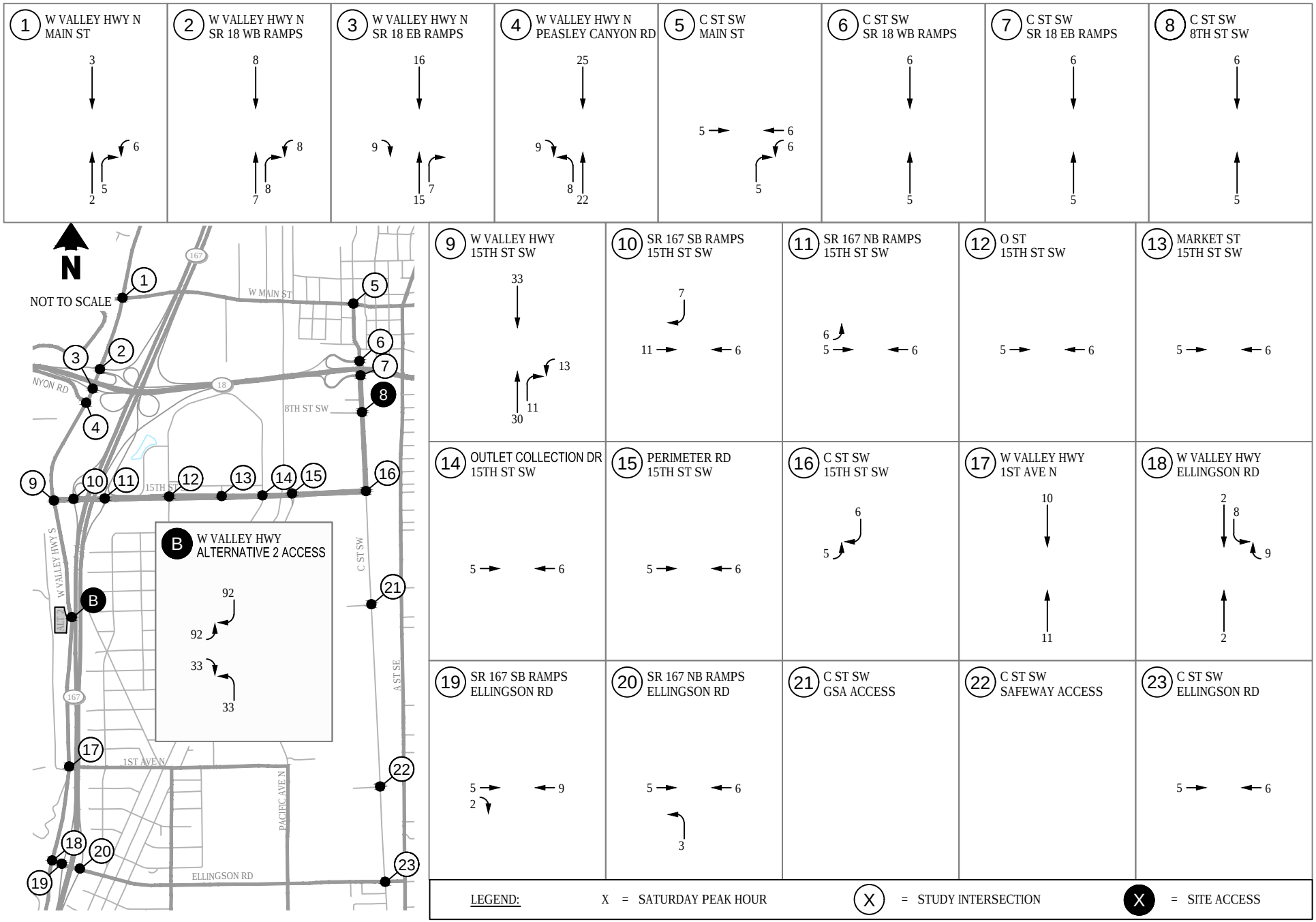
FIGURE

E-22

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Weekday_2020 assign> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 2 2020 Saturday Peak Hour Trip Assignment

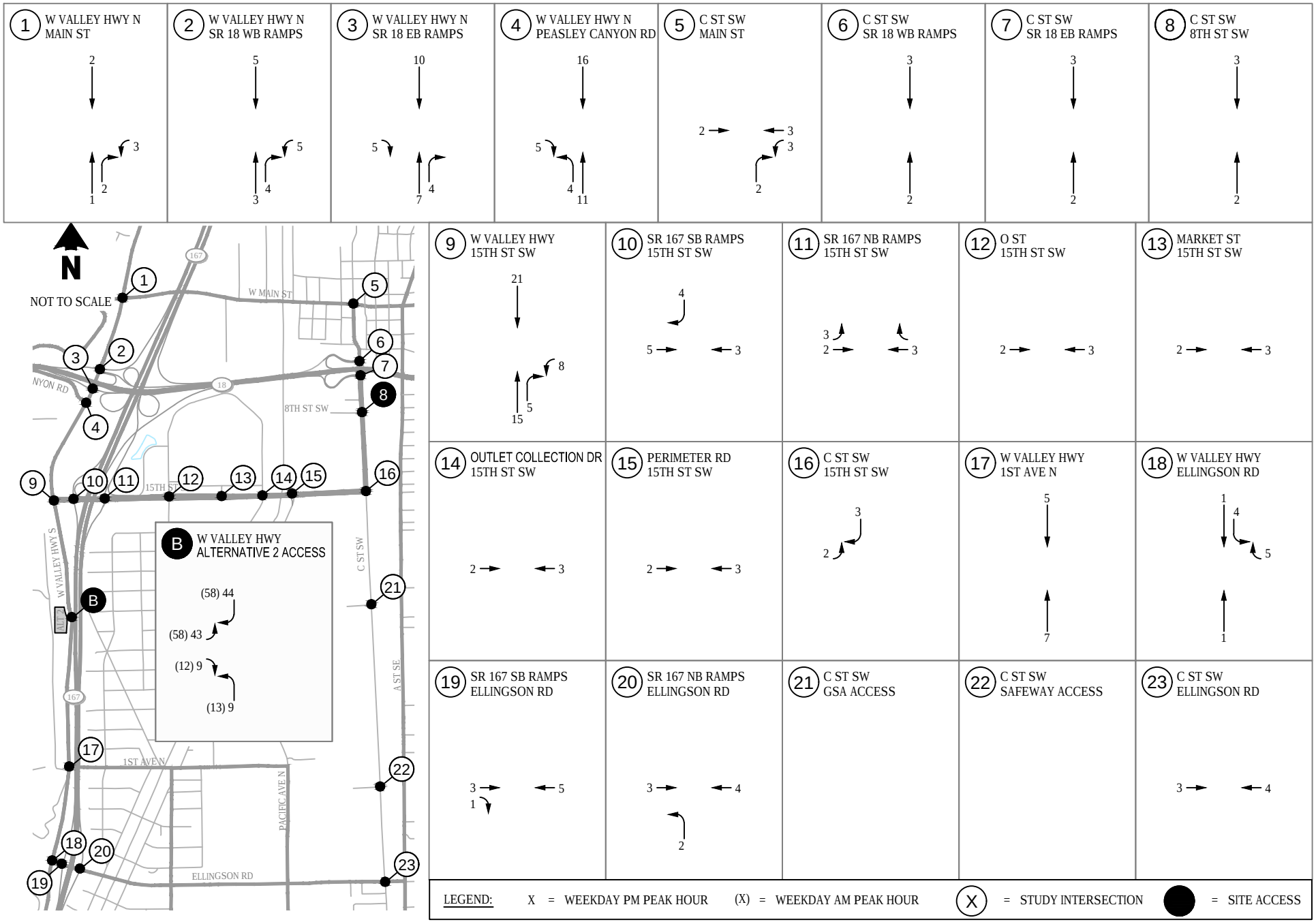
FIGURE

E-23

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Sat_2020 assign> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 2 2040 Weekday Peak Hour Trip Assignment

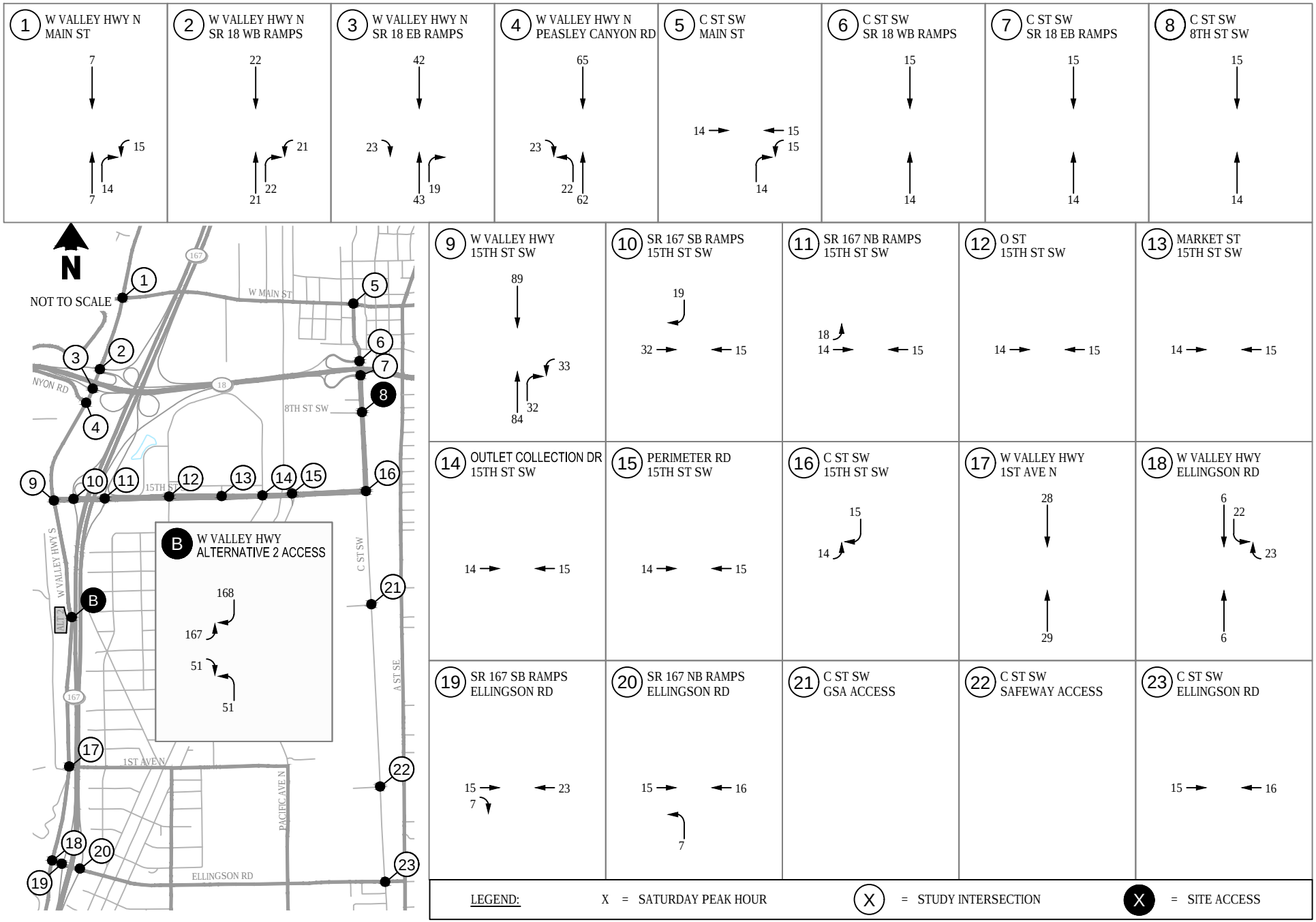
FIGURE

E-24

King County South Transfer Station

transpogroup

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Weekday_2040 assign> walkerc 05/21/15 09:57



Alternative 2 2040 Saturday Peak Hour Trip Assignment

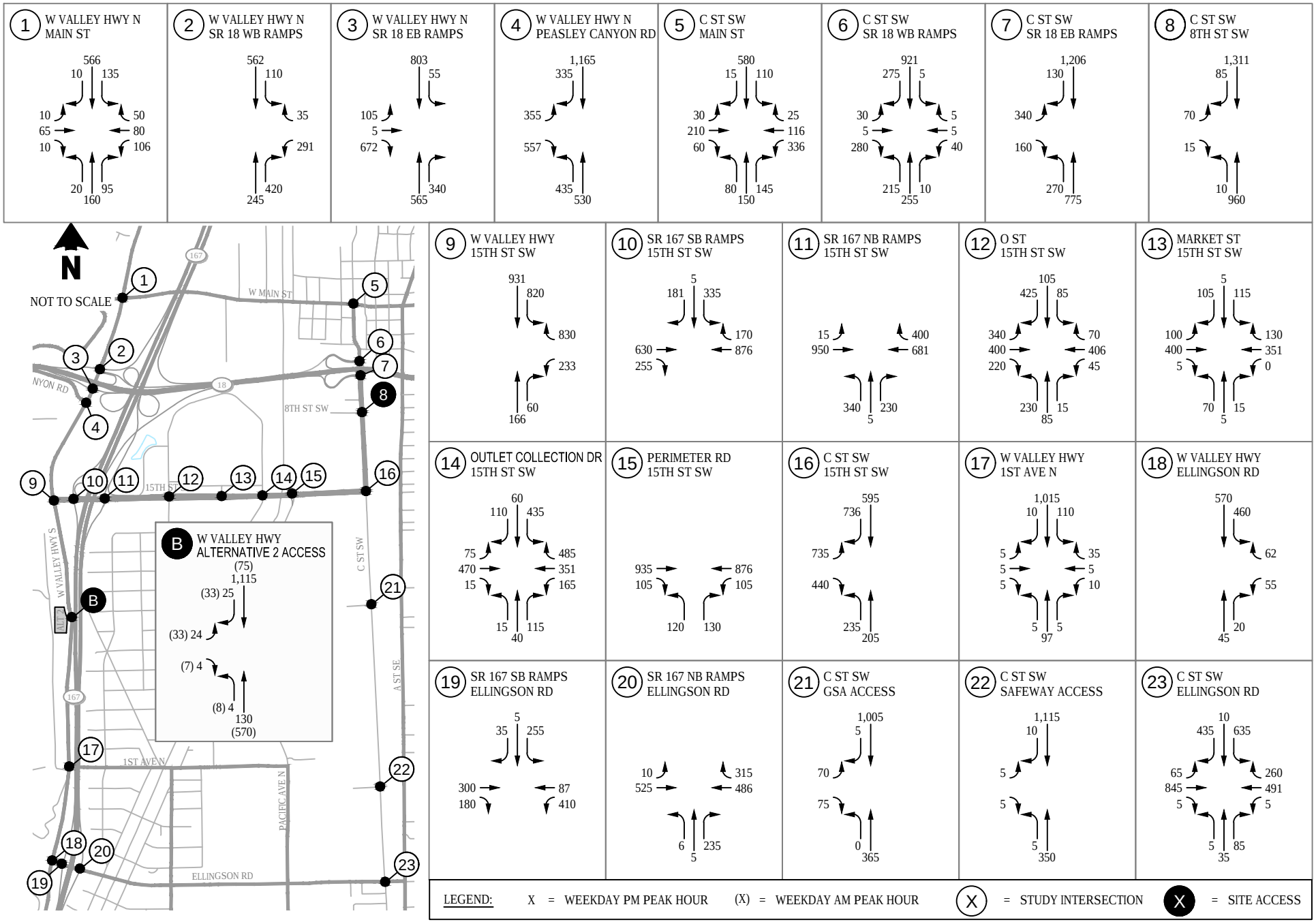
FIGURE

E-25

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Sat_2040 assign> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 2 2020 Weekday Peak Hour Traffic Volumes

FIGURE

E-26

King County South Transfer Station

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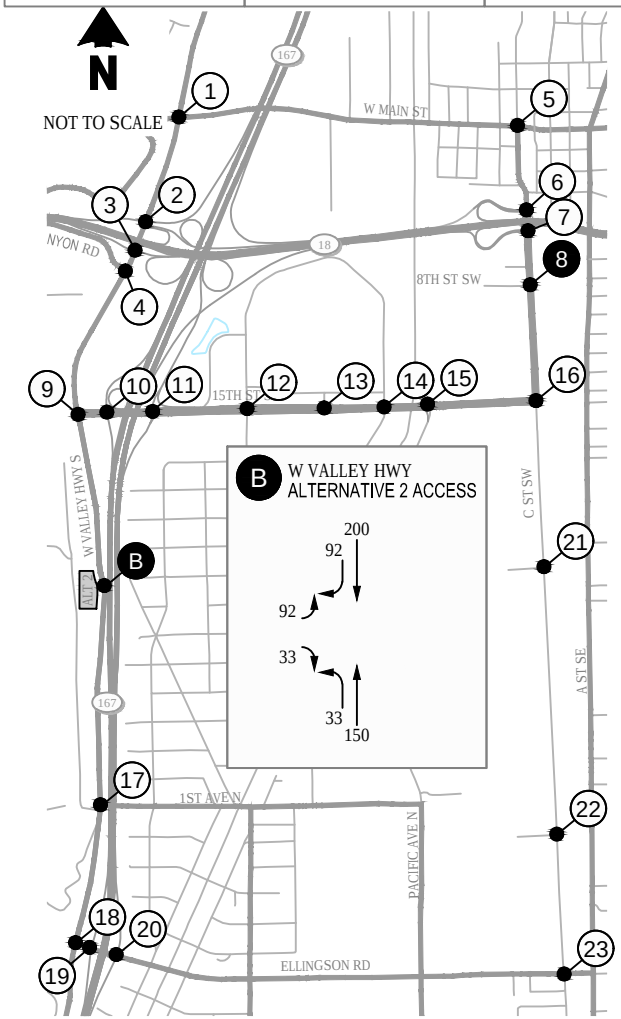
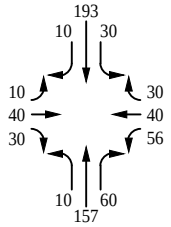
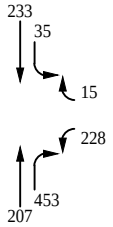


1 W VALLEY HWY N / MAIN ST



2 W VALLEY HWY N / SR 18 WB RAMPS



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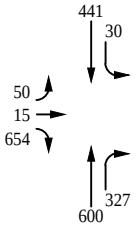
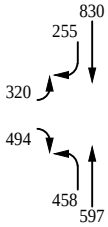
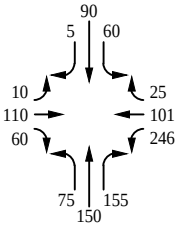


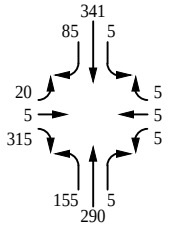
4 W VALLEY HWY N / PEASLEY CANYON RD



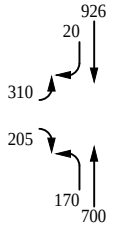
5 C ST SW / MAIN ST



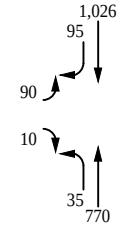
6 C ST SW / SR 18 WB RAMPS



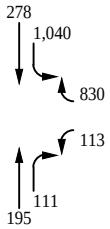
7 C ST SW / SR 18 EB RAMPS



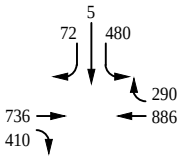
8 C ST SW / 8TH ST SW



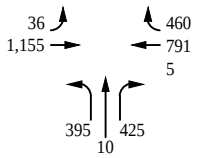
9 W VALLEY HWY / 15TH ST SW



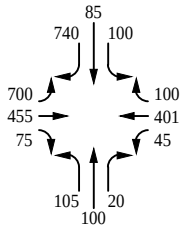
10 SR 167 SB RAMPS / 15TH ST SW



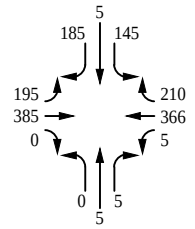
11 SR 167 NB RAMPS / 15TH ST SW



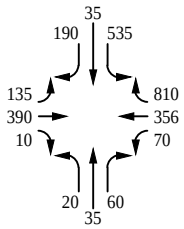
12 O ST / 15TH ST SW



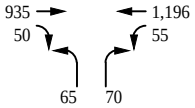
13 MARKET ST / 15TH ST SW



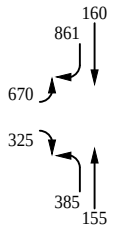
14 OUTLET COLLECTION DR / 15TH ST SW



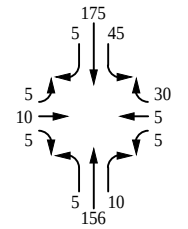
15 PERIMETER RD / 15TH ST SW



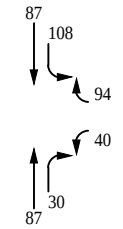
16 C ST SW / 15TH ST SW



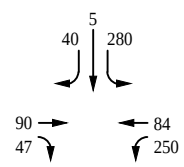
17 W VALLEY HWY / 1ST AVE N



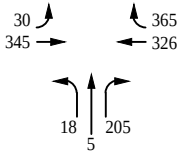
18 W VALLEY HWY / ELLINGSON RD



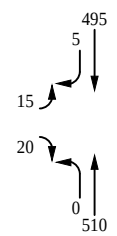
19 SR 167 SB RAMPS / ELLINGSON RD



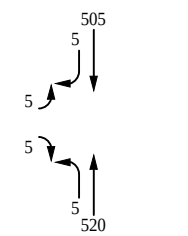
20 SR 167 NB RAMPS / ELLINGSON RD



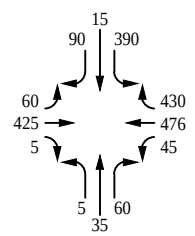
21 C ST SW / GSA ACCESS



22 C ST SW / SAFEWAY ACCESS



23 C ST SW / ELLINGSON RD



LEGEND: X = SATURDAY PEAK HOUR (X) = STUDY INTERSECTION (X) = SITE ACCESS

Alternative 2 2020 Saturday Peak Hour Traffic Volumes

FIGURE E-27

King County South Transfer Station

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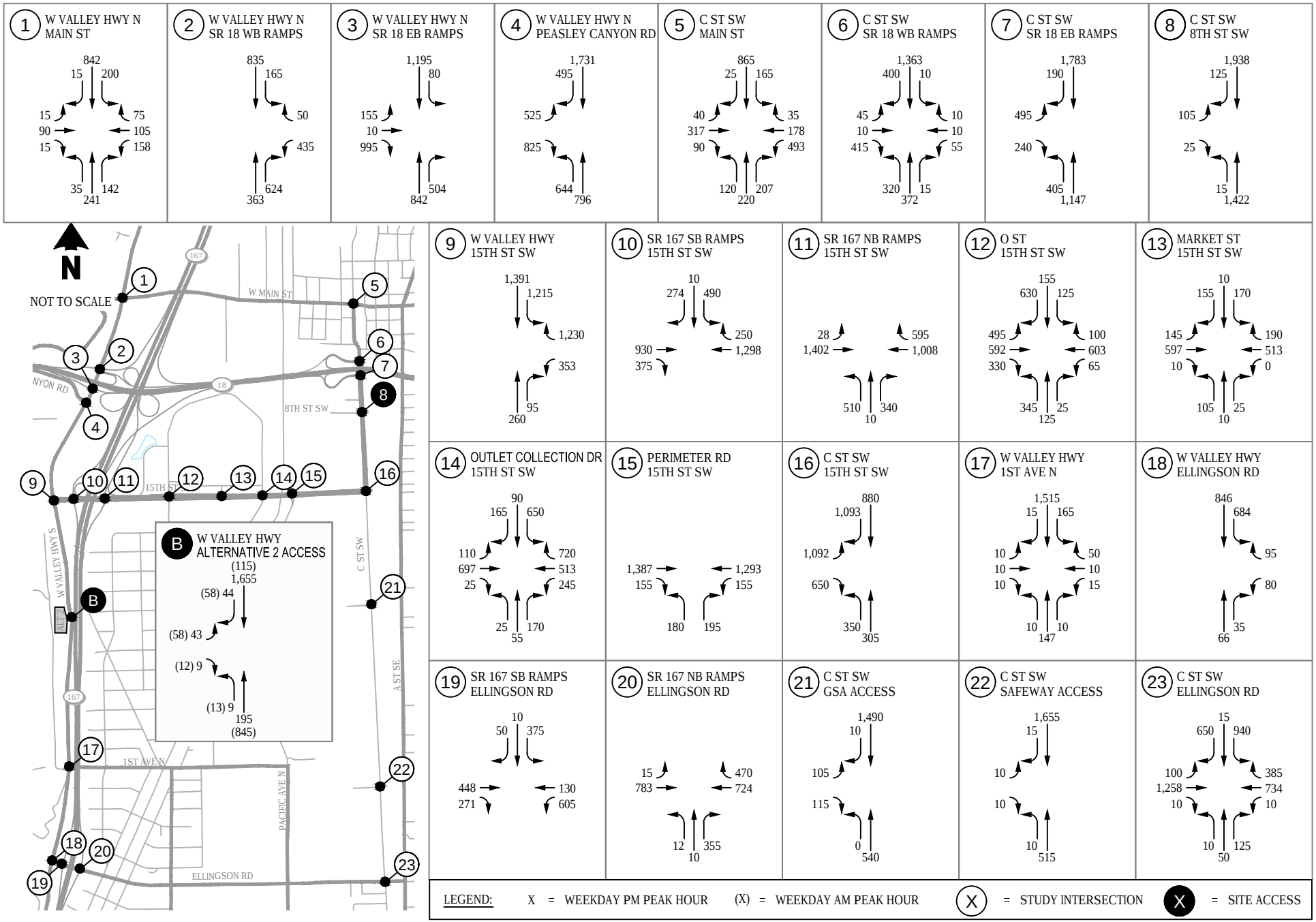


Alternative 2 2040 Weekday Peak Hour Traffic Volumes

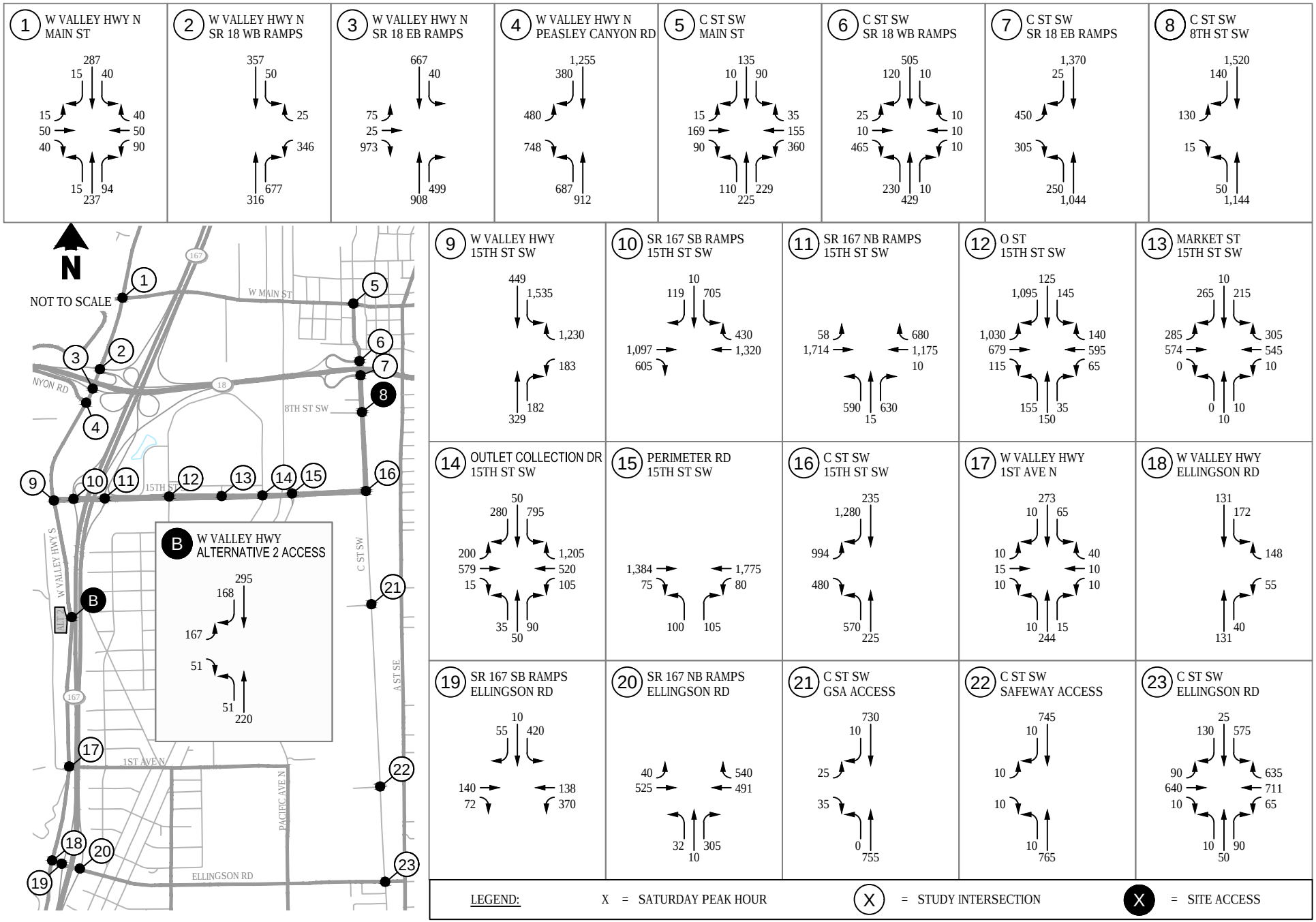
FIGURE

E-28

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Weekday_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.



Alternative 2 2040 Saturday Peak Hour Traffic Volumes

FIGURE

E-29

King County South Transfer Station

\\srv-dfs-wa\MM_Projects\Projects\12\12014.00 - King County Recycling & Transfer Station\South Sound Sites\Graphics\12014_EIS graphics <Alt 2_Sat_2040> walkerc 05/21/15 09:57

transpogroup WHAT TRANSPORTATION CAN BE.

Appendix F

Responses to Comments on DEIS

Appendix F: RESPONSE TO COMMENTS

This appendix documents the comments received on the DEIS and King County's responses to each comment. A list of the tribe, agencies, business, and individuals who submitted comments is also provided.

Comments on the Draft EIS

The DEIS was published on February 4, 2016 and made available for public comment until March 9, 2016. More than 26,000 flyers notifying residents of the availability of the DEIS were mailed to the public and e-mails were also sent to other interested parties. During this comment period, King County hosted two public open houses, one each in Auburn and Algona. The open houses allowed the public to learn about the proposed action and the environmental analysis, and to submit comments on the proposal. Comments at the open houses were made on written comment forms and by providing public testimony to a court reporter.

A total of 78 comment letters, comment forms, e-mails, statements of testimony and a petition were submitted during this process, collectively referred to as "comment letters". Of the 78 total comments received, 74 were submitted by individuals and one business owner. A citizen petition by residents living near Alternative 2 was submitted in opposition to that Alternative. Most comments received by members of the public during the DEIS comment period, including the two public open houses, consisted of statements of opposition to the project. Table F-1 summarizes the most commonly cited topics.

Table F-1: Summary of Most Commonly Cited Topics in DEIS Comments

Tribe	Agency	Individual and Business
• Water Resources • Vegetation and Wetlands • Wildlife and Fish	• Traffic • Alternatives/Chapter 2 • Water Resources • Land Use	• Property values • Odor, Pest, and Noise • Slope Stability • Traffic

The remaining four comment letters were received from the Muckleshoot Indian Tribe and the cities in the SCRTS service area (See Table F-2). These letters included 199 comments by the City of Algona, 66 comments by the City of Auburn, 12 by the Muckleshoot Indian Tribe and 7 by the City of Federal Way. Most of these comments addressed technical issues with the environmental analysis, ranging from general criticisms of the analytical approach to specific suggestions for data updates.

Table F-2: Tribe and Agency Comments

Tribe or Agency	Commenter	Comment/Response #
Muckleshoot Indian Nation	Walter, Karen (Muckleshoot)	T1 to T-12
State Representative 47th Legislative District	Hargrove, Mark	A-1
City of Algona	Dave Hill, Mayor	A-2 to A-199
City of Auburn	Kevin Snyder, Director Community Development and Public Works	A-200 to A-266
City of Federal Way	Michael Morales Community Development Director	A-267 to A-273

See Table F-3 for the list of individuals and the one business owner who submitted comments on the DEIS.

Table F-3: Business and Individual Comments

Commenter	Comment/ Response #	Commenter (cont.)	Comment/ Response # (cont.)
Scoccolo, Tina (Terra Dynamics)	**B-1**	Lundberg, Terri	**I-37**
Ahn, Aimee	**I-1**	Lyndemere, Marie	**I-38**
Armstrong, Edward	**I-2**	Malik, David	**I-39**
Baker, Jeff & Gail	**I-3**	Marshall, John	**I-40**
Brekke, John	**I-4**	McCauley, Bill	**I-41**
Brekke, Eleanor	**I-5**	McCleaskey, Jim	**I-42**
Cavness, Shawn	**I-6**	McCulloch, Al	**I-43**
Choe, Byoung & Jinny	**I-7**	Molvik, David	**I-44**
Cowan, Sally	**I-8**	Moore, Abe & Barbara	**I-45**
Cox, Jennifer	**I-9**	Nelson, Michelle	**I-46**
Davies, Deane	**I-10**	Nelson, Eric	**I-47**
DeWitt, Scott	**I-11**	Nguyen, AnhThu	**I-48**
Duffy, Michael	**I-12**	Nufer, Philip & Jessica	**I-49**
Dupoint, Juanita	**I-13**	Nunogawa, Sunshine	**I-50**
Elliott, Len	**I-14**	Pak, Chun	**I-51**
Eneberg, Mike & Kara	**I-15**	Pelayo, Gustavo & Rosalina	**I-52**
Escobedo, Dee Anna	**I-16**	Perth, Brent Williams	**I-53**
Faulder, Ralph	**I-17**	Pyon, Muho	**I-54**
Gauthier, Kevin	**I-18**	Ritchie, Lyn	**I-55**
Gunderson, Doug	**I-19**	Rockwell, John	**I-56**
Hanson, Keith & Cindy	**I-20**	S, J	**I-57**
Harker, Young Kim	**I-21**	Sallee, Cheryl	**I-58**
Harkness, Marie-Anne	**I-22**	Sankaranarayanan, Murali	**I-59**
Hatch, Susan	**I-23**	Shelmadine, Lori	**I-60**
Hatch, Duane	**I-24**	Shim, Jae	**I-61**
Hoosen, Sue Van	**I-25**	Skahill, Paul	**I-62**
Humphrey, Amy	**I-26**	Snipes, Sonya	**I-63**
Hurlbut, Terry	**I-27**	Tucker, Shirley	**I-64**
Kang, Insung	**I-28**	Weir, Richard	**I-65**
Kesgard, Laurie	**I-29**	Young, Suk	**I-66**
Kim, Hea	**I-30**	Young, Ken & Vanessa	**I-67**
Kirschbaum, Devon	**I-31**	Yu, Jessica	**I-68**
Klahn, Tim & Cheryl	**I-32**	Yuchimiuk, Sergy	**I-69**
Kone, Brian	**I-33**	Zimmerman, Richard & Melinda	**I-70**
Li Villalobos, Chuck	**I-34**	Anonymous	**I-71**
Li-Diederichs, Laura	**I-35**	Anonymous	**I-72**
Lundberg, Roland	**I-36**	Citizen petition	**I-73**

Response to Comments on the Draft EIS

King County reviewed all comments submitted during the DEIS comment period. Comment documents were copied or transcribed into the comment response table for legibility. Comment letters addressing specific technical concerns with the DEIS were sorted by type Tribe (T), Agency (A), Business (B), or Individual (I) and numbered. Each substantive comment was categorized by topic. Each comment received a specific response for each specific technical issue cited. The response references the corresponding section(s) of the FEIS and if updates or revisions were made. In cases where responses applied to multiple comments, the response simply references the comment/response number that addresses the cited issue. See Table F-4.

Table F-4: SCRTS Draft EIS Comment Response Table

Comment/ Response #	Topic	Comment	Response
T-1 (Muckleshoot)	Water Resources Vegetation and Wetlands Wildlife and Fish	The Muckleshoot Indian Tribe Fisheries Division Habitat Program has reviewed the Draft Environmental Impact Statement for the proposed South County Recycling and Transfer Station project. We offer the following comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources. Generally, the project should be seeking to avoid impacts to streams and wetlands in the area. This is a requirement of SEPA and arguably should be a requirement for a project seeking LEED status. In addition, our program's objective is to protect and restore habitat for the Tribe's fisheries resources. To meet these requirements and objectives, Alternative 1 should be pursued because its impacts to surface water resources solely involve potential impacts to a Category IV wetland's buffer and will have substantially fewer impacts to streams and wetland than Alternative 2. Figures 3.1-3 and 3.3-3 shows how constrained the Alternative 2 site is due to the existing critical areas and hazards.	A detailed site design will be developed during the design phase. At this time, the State Environmental Policy Act (SEPA) analysis includes conservative assumptions addressing anticipated environmental impacts, according to the requirements stated in RCW 43.21C. Impacts of the project must be limited to those identified in the SEPA analysis. If substantial additional impacts are identified, the need for additional SEPA review will be determined in accordance with WAC 197-11-600. While wetland and stream impacts under Alternative 2 are unavoidable; the current assumptions that all portions within the development area (Figure 2-3) would be directly impacted is a conservative estimate. It is anticipated that actual impacts will be less, as the design process will allow for more precise impact avoidance measures. To provide greater clarity, tables summarizing applicable wetland and stream rating systems can be found in Sections 3.3.2.3 and 3.4.1.2.
T-2 (Muckleshoot)	Water Resources Vegetation and Wetlands Wildlife and Fish	The level of information available in the DEIS is too limited to determine if there will be a net-loss or net-gain to Algona Creek tributary and onsite wetlands from the project. While, it is possible that the project will improve fish habitat over existing conditions by providing fish passable culverts, enhancing the remaining stream sections both instream and adjacent riparian areas, and using enhanced stormwater treatment methods to reduce metals, oils and other toxics. Unfortunately, the details as to how this alternative will demonstrate a net gain in fish habitat are lacking at this point to make this determination. Most of this analysis is being left to future work once Alternative 2 is chosen when it should be available now. Therefore, it is pre-mature to conclude that this project will not have significant unavoidable adverse impacts at Alternative 2 without more details about project impacts and proposed mitigation measures as discussed further below.	The site design is not advanced enough at this stage of planning to provide details related to culvert design, stream and riparian enhancements or stormwater treatment. A Critical Areas Report will be prepared that includes a complete wetland and stream mitigation plan demonstrating compliance with regulatory requirements. This will be developed during detailed design and provided as part of the permitting process. The plan will include an analysis of all wetland and stream impacts based on the detailed site design, and will propose on-site and off-

Comment/ Response #	Topic	Comment	Response
			site mitigation measures. See response T-1. Section 3.4.4.3 paragraph 1, describes the City of Algona's Critical Area Report requirements.
T-3 (Muckleshoot)	Water Resources Vegetation and Wetlands	Per the DEIS, Alternative 2 has unavoidable impacts to the onsite stream, Algona Creek tributary (WRIA 09.0054A) and wetlands. The Algona Creek tributary is a fish-bearing stream that flows to Algona Creek which flows into Mill Creek and eventually into the Green River just west of SR 167. Wetland A is a riverine depressional wetland associated with Algona Creek tributary (WRIA 09.0054A). For Alternative 2, the DEIS specifically states (page 3-63): "It is assumed that all of Wetland A would need to be permanently filled (0.28-acre) to accommodate the transfer station. Construction-related activities including clearing, grading, and filling could also result in permanently filling of all of Wetland B (0.10-acre)." (page 3-63). This will cause direct impacts to salmon habitat as a result because Wetland A is a riverine wetland associated with Algona Creek tributary. Wetland A's buffer will also likely be eliminated and there may be filling and buffer reductions to Wetland B per the DEIS which states: "Work would also occur within Wetlands A and B and their buffers due to the clearing, grading and straightening the curve in West Valley Highway South." (page 3-64).	Comment acknowledged.
T-4 (Muckleshoot)	Water Resources Vegetation and Wetlands	While some of the direct impacts to Algona Creek tributary and onsite wetlands have been identified, generally, the extent of potential direct, indirect, and cumulative impacts to Algona Creek tributary and Algona Creek for Alternative 2 are incomplete. For example, there are proposed direct impacts to the Algona Creek tributary proposed from relocation and/or additional piping and likely reduced buffers to accommodate the transfer station as the stream flows in the middle of the Alternative 2 site. Piping the stream will reduce available habitat and functions. Stream relocation may reduce stream length and existing instream habitat. These onsite impacts are only one potential impact. The frontage requirements associated with Alternative 2 also affects Algona Creek tributary where it is currently piped within the road corridor. The roadway work will likely result in indirect and cumulative impacts as these roadway improvements will trigger other future improvements to West Valley Highway potentially affecting Algona Creek, wetlands, and maybe Mill Creek downstream.	See response to T-1. A significant portion of the stream within the project area is currently piped and lacks suitable habitat for fish. The project would take the opportunity to improve the habitat value of the stream channel including features such as use of appropriate streambed gravel, bio-engineered banks, and installation of woody debris. Road frontage improvements would be limited to straightening the curve and possibly adding turn lanes for site access. These safety and access improvements would incorporate water quality and stormwater control elements that do not currently exist. See Section 2.1.3 in the

Comment/ Response #	Topic	Comment	Response
			FEIS for clarified description of frontage improvements.
T-5 (Muckleshoot)	Geologic Hazards Wildlife and Fish Common Elements of Operation	Another potential concern are any stream impacts from the adjacent erosion and landslide hazard areas that may affect the stream during construction and/or the built site. For example, should a landslide occur during construction or post construction from changes in slope stability or hydrology, this would likely impact Algona Creek tributary directly or result in emergency actions to protect built facilities that also impact the stream. Artificial lighting at the facility is another potential impact to salmon as a result of increased predation opportunities and was not discussed in the appropriate DEIS sections. The location of these lights, their orientation, the type of lighting (both pole and light bulbs) all need to be discussed in detail to determine potential impacts.	Potential erosion and landslide hazards will be evaluated during detailed design in the geologic hazards report, Stormwater Pollution Prevention Plan and Temporary Erosion and Sedimentation Control plan that will be required for this project. Each of these plans will provide specific measures to reduce or eliminate erosion or landslide impacts. Minimum buffer and setback requirements will be followed. No water bodies occur on the No Action Alternative site and fish are unlikely to be present in wetlands on the Alternative 1 site. The potential impacts to fish from artificial lighting under Alternative 2, and impact minimization measures, are addressed in Section 3.5.2.3.
T-6 (Muckleshoot)	Water Resources	A third concern is for potential impacts to Algona Creek tributary (both loss of baseflows and water quality) as result of groundwater resource proximity. Per the DEIS: "Two shallow 15-foot borings were completed at the Algona Transfer Station in January 1999 by the King County Department of Transportation for a pavement study. Groundwater was observed in one of the borings at 12 feet bgs and not encountered in the second boring at the time of drilling. Six borings drilled along West Valley Highway South near 15th Street SW (Landau Associates 2D03) indicate groundwater ranged from 3 to 10 feet below the highway." Groundwater appears to be relatively close to the surface along West Valley Highway South and the Alternative 2 site. This is a concern for two reasons. First, construction activities will likely encounter groundwater which will require substantial actions to ensure that groundwater is managed to avoid creating erosion-laden water that discharges to nearby Algona Creek tributary, Algona Creek, Mill Creek and their associated salmon resources. We note that other projects nearby that excavated in shallow groundwater conditions in this subbasin ended up with high turbidity levels and water quality violations that likely adversely impacted salmon resources despite having Stormwater Pollution Prevention Plans. The closeness of groundwater resources also affects how Alternative 2's built impervious surfaces and stormwater management could affect Algona Creek tributary. For example, it may not be possible to treat and infiltrate stormwater due to the proximity of groundwater which will create the need for direct stormwater discharges to Algona Creek tributary that can adversely affect the quantity	Groundwater conditions would be studied during future detailed geotechnical investigations of the site. Alternative 2 would comply with water source protection requirements and recommendations under federal, state and local regulations. BMPs would be implemented to protect Algona Creek Tributary 09.0054A from stormwater discharges and to minimize runoff and erosion from steep slopes. A NPDES Construction Stormwater General Permit would be required and include a Temporary Erosion and Sediment Control plan and BMPs that would be implemented in accordance with the Stormwater Pollution Prevention Plan. Temporary impacts to water quality from runoff and erosion during construction clearing and grading and development of the site would be minimized through these measures.

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		and quality of habitat for salmon. The current stormwater manuals are not sufficient to fully mitigate impacts to salmon where stormwater is discharged into streams.	
T-7 (Muckleshoot)	Water Resources	An additional concern is potential impacts to seeps and seepage contributing flow to Algona Creek tributary and its wetlands. The DEIS notes that seepage was observed coming out of hillside slope near the eastern boundary of the project at West Valley Highway South in winter/spring 2013 and September 2015 field visits, which are likely important for contributing to base flows and cool water for Algona Creek tributary particularly given that we were still in drought conditions in September 2015. There is no further discussion regarding seepage and if and how these areas may be impacted from Alternative 2.	As noted in Section 3.3.3.1, Alternative 2 would comply with water source protection requirements and recommendations under EPA, DOH, King County Health Department, and other federal and state regulations. Wetland seeps are addressed in Section 3.4. Protecting water quality of seepage will also be addressed in the wetland and stream mitigation plan during the permitting process.
T-8 (Muckleshoot)	Water Resources	The DEIS should note limitations in water quality impairment data. Water resources impairment under the State Water Quality Standards (Section 303(d)) is a function of available data and does not necessarily reflect actual conditions for waterbodies that haven't been surveyed or assessed. We would expect portions of Algona Creek to be impaired similar to Mill Creek based on existing conditions and adjacent land use.	Section 3.3.2.1 of the FEIS reflects the requested addition noting limitations in water quality impairment data.
T-9 (Muckleshoot)	Cumulative Impacts	The cumulative impacts section is incomplete. For example, WSDOT is currently expanding SR 167 in the project area. Algona issued SEPA documents to expand the existing propane facility along West Valley Highway near this project site which would result in impacts to Algona Creek and its tributary. Another potential consideration is further road work on West Valley to increase capacity. Auburn recently completed improvements at West Valley and West Main Street. (see http://www.psrc.org/assets/11618/TIP-Projects20140523.pdf?processed=true). It also seems likely that other projects in Algona, Pacific and surrounding areas such as the Stewart Road improvements, Valentine Road widening, etc. will add to cumulative impacts in the affected watersheds. None of these ongoing and foreseeable projects were assessed.	The SEPA Rules (WAC 197-11) provide no specific definition of “cumulative impacts”, although the term is used in several places. SEPA case law applies the concept very restrictively and defines cumulative impacts as the impacts of the proposal along with the impacts of other actions that are virtually compelled or made inevitable as a result of the proposed action. The FEIS contains a discussion of Indirect and Cumulative Impacts as required by SEPA for each relevant environmental element.
T-10 (Muckleshoot)	Vegetation and Wetlands	It is important to note that the conceptual mitigation ideas on page 3-67 are not all equal. First, the proposal to use WRIA 9 restoration projects as mitigation for this project will take a project identified as needed for recovery of chinook salmon (i.e. net gain) and be used to support a "no-net loss" approach. These are not equivalent. Assuming this approach is acceptable, then the County and WRIA 9 will need to find and implement a new restoration project to replace the one used as mitigation instead of restoration. The mitigation alternatives option using King County's In Lieu program has limitations as currently there are no roster sites in the larger Mill Creek impacted basin. If off-site mitigation is needed, it would probably be best to use one of the sites identified for mitigation from the Mill Creek Special Areas Management Plan which	If Alternative 2 is selected, these issues will be addressed during design and permitting through the development of the wetland and stream mitigation plan, as required by Chapter 16 of the Algona Municipal Code.

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		would add to those sites where mitigation has already occurred and keep the mitigation in the same sub-basin where the impacts are occurring.	
T-11 (Muckleshoot)	Wildlife and Fish	The discussion on potential fish use is incomplete. If it were fully accessible, we would expect at least coho use in Algona Creek tributary if accessible based on our knowledge of salmon use in Mill Creek, the existing tributary conditions and the mapping from WDFW's Salmon Scape coho distribution information. The details of the West Valley Frontage and Overlay project need to be provided before conclusions can be reached regarding impacts to salmon and their habitats (page 3-81).	See response to T-4 above. The discussion of potential salmonid habitat and use in Algona Creek tributary at the Alternative 2 site has been updated in Section 3.5.2.3. As noted in section 3.5.2.3 of the FEIS, the closest documented occurrence of salmonids (Coho salmon) is approximately 4,000 feet downstream (WDFW 2015b).
T-12 (Muckleshoot)	Alternatives Water Resources Vegetation and Wetlands	In conclusion, all of these potential impacts to Algona Creek tributary, its associated wetlands and downstream Algona Creek could be avoided if Alternative 1 was chosen because per the DEIS, (page 3-8) the groundwater table is deeper (i.e. between 8.5 to 14 feet below the ground surface); there are no streams nearby; and this Alternative may impact a portion of a Category IV wetland.	Comment acknowledged.
A-1 (State Rep.)	Alternatives	From my perspective Alternative 1 makes the most sense. Close to Hwy 18, more customers having closer access. Not close to any homes.	Comment acknowledged.
A-2 (Algona)	General Comment Applicable to Entire DEIS Alternatives Chapter 3	With this letter the City of Algona submits comments regarding the Draft Environmental Impact Statement (DEIS) for the proposed South County Recycling and Transfer Station (SCRTS). The DEIS discusses two sites for the proposed SCRTS Project: (1) Alternative I, which is located at 902 C Street SW in Auburn, and (2) Alternative 2, which is located at 35101 West Valley Highway South in Algona. According to Section 1.8 of the DEIS, both Alternative 1 and Alternative 2 are viable sites. The King County Executive will ultimately make the final decision and pick from the two Alternatives analyzed through the EIS process, taking into account several considerations, one of which is the "analysis in this EIS," as stated in the DEIS. The DEIS is deficient because it does not adequately document the process by which these two Alternative sites were determined to be the only two viable locations for the SCRTS. Regardless of the process, the City of Algona does not accept the determination of Alternative 2 as the "Preferred Alternative." Based on the information disclosed in the DEIS, the siting of the SCRTS in Algona is not justified. The DEIS is incomplete, inaccurate and insufficient. It fails to identify all of the significant adverse environmental impacts, fails to properly explain those impacts, and fails to develop clear and meaningful mitigation measures for those impacts. We submit the enclosed document with this letter, which contains many comments and suggestions. Although we did our best to review and evaluate the DEIS in the short period of	See responses below to specific comments.

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		time provided, we were unable to properly review and evaluate several of the complex environmental elements, impacts and proposed mitigation measures. Our comments and suggestions are generally as follows: • Selection of Alternative 2 as the Preferred Site, and the elimination of other potential sites, particularly three of the five final sites, is not adequately explained or justified. • Elimination of the other sites, and the compliance of Alternatives I and 2 with the relevant provisions of the King County Comprehensive Plan, is not properly explained or discussed. • Selection of Alternative 2 is not consistent with the Functional Criteria developed by the Solid Waste Division or with the Community Criteria developed by the Siting Advisory Committee for the siting process. • Many of the environmental elements are not adequately discussed, particularly with respect to Alternative 1. • Many adverse environmental impacts relating to Alternative 2 are not acknowledged, or if acknowledged, are not adequately discussed. • Many of the conclusions regarding adverse environmental impacts, or lack thereof, are not logical, given the identified facts and information. • Mitigation measures are either missing or not adequately described. • Indirect impacts and cumulative impacts are not adequately described. • Adverse environmental impacts of the No Action Alternative are incomplete and inconsistent. We trust that you will consider carefully our comments and suggestions, and will substantially improve the DEIS to present a fair and complete picture of the potential for significant adverse environmental impacts of the proposed transfer station at the Alternative 1 site or the Alternative 2 site. We request that all of our comments be specifically responded to, and that the responses be disclosed in the Final EIS.	
A-3 (Algona)	General Comment Applicable to Entire DEIS	Algona's lack of access to the Alternative 1 site (Auburn) diminishes the quality of data from which to complete an accurate analysis of comparative impacts between the alternatives, particularly for resource areas that require detailed data of site specific conditions, such as wetlands and vegetation, hazardous materials, and cultural resources (among others).	The EIS has accurate analysis of comparative impacts. Refer to the specific resource area chapters for this data.
A-4 (Algona)	General Comment Applicable to Entire DEIS Alternatives	Insufficient information is presented in the DEIS to justify the elimination of 3 of the 5 sites that remained after broad area screening, and the selection of the two build alternative sites from these 5 sites. The DEIS should document the decisions regarding these 5 sites by providing information relative to: the screening criteria; the relative importance of particular criteria, or ranking of the 4 potential sites that resulted from the focused area screening; or the comparisons of the sites which resulted in the conclusion that the Auburn and Algona sites should be included in the DEIS analysis.	King County Solid Waste Division conducted a rigorous inclusive process to identify potential sites for the project. Section 1.3 of the FEIS provides a summary of the siting process. More detailed information about the siting process is included in the referenced *SCRTS Siting Report* with Addendum (King

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			County 2015b) posted on King County's SCRTS website.
A-5 (Algona)	General Comment Applicable to Entire DEIS Alternatives	The No Action Alternative is insufficiently defined relative to duration of operation of the existing Algona station (i.e. DEIS states that it will operate for "as long as feasible"); the Action alternative impacts cannot be appropriately compared to an undefined baseline. The definition of "No Action Alternative" as including undefined future conditions, such as "if the station closed" and the stated consequence of "transfer services no longer offered within the south county area" creates a No Action Alternative inconsistent with the County's requirements in the Solid Waste Transfer and Waste Management Plan to "geographically distribute facilities throughout the County in order to equitably serve all customers," and thus creates a potentially invalid baseline condition against which the alternatives are compared.	As stated in the FEIS, the No Action Alternative will continue to operate indefinitely. Any future repairs or maintenance would be addressed at the time they are needed. Sections 1.2 and 2.1.1 reflect changes made to improve clarity.
A-6 (Algona)	General Comment Applicable to Entire DEIS Decommissioning	Decommissioning of the existing Algona station is not explicitly included as a component of the build alternatives (i.e. within the alternative descriptions in Chapter 2), despite some impacts of decommissioning actions being addressed as impacts and mitigation in Chapter 3. Provisions for ensuring that a clean, commercially viable property is created once the existing Algona station is decommissioned are insufficiently addressed in the DEIS. Impacts cannot be sufficiently analyzed when the alternative descriptions are incomplete.	Definitions for decommissioning and deconstruction have been added in the glossary. Station decommissioning is described in Section 1.7 of the FEIS. This section states that, "it is anticipated that closure and decommissioning of the existing Algona Transfer Station would occur after a new SCRTS is constructed and operating." Decommissioning would comply with closure requirements described in Section 1.5.2. Decommissioning is added to the list of common elements for Alternatives 1 and 2 (Section 2.2.2).
A-7 (Algona)	General Comment Applicable to Entire DEIS Alternatives Mitigation	Inadequate data and analysis in the DEIS to support the selection of the Algona site as the preferred alternative; impacts at the Algona site are in several instances larger in context and intensity than at Auburn alternative site (see comments regarding Chapter 3) and mitigation measures to reduce impacts are inadequately tied to the specific mechanisms of impact reduction.	SEPA does not require a specific rationale for an agency's determination of a preferred alternative, and the designation of a preferred alternative in no way restricts the County's final decision. Mitigation measures are revised in Chapters 3 of the FEIS where appropriate.
A-8 (Algona)	General Comment Applicable to Entire DEIS Mitigation	Inadequate description and presentation of mitigation measures, and there is a lack of measures tied to specific mechanisms of impact reduction, resulting in insufficient justification for impact reduction and for selection of the Algona site as the preferred alternative. a. Mitigation measures are mostly required items per existing regulations (e.g. Algona Code, Auburn Code, NPDES or Clean Water Act permits).	This project is defined to be compliant with all applicable regulations and include provisions to prevent or reduce impacts to the environment. Accordingly, both Action Alternatives include numerous

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	Transportation Noise	b. Mitigation described is vague and unclear. c. 'Mitigation' as described in the transportation and noise sections does not provide mitigation for the nature and amount of impacts disclosed.	provisions described in Chapter 2 to prevent and minimize adverse environmental impacts and to maximize enhancements. Measures to be taken to address environmental impacts that have not been satisfied by project commitments and regulatory requirements are listed under the Mitigation Measures sections of Chapter 3 where appropriate.
A-9 (Algona)	General Comment Applicable to Entire DEIS Socioeconomics	The DEIS and the King County Comprehensive Plan are inconsistent. The Comprehensive Plan states that both environmental AND economic analysis must occur when siting an essential public facility, including a transfer station. While the DEIS states that economic analysis occurred during "the siting process used to identify the alternatives", there is no indication in the DEIS of the results of such analysis nor is there any analysis in the DEIS indicating consideration of economic or socioeconomic impacts to the host city of the facility or its residents from the build alternatives. a. Economic impacts are not considered or analyzed in the DEIS, despite probable implications to the potential host city (Algona) from the proposed change in land use to a non-revenue generating land use. b. Socio-economic impacts are not considered or analyzed in the DEIS, particularly relative to the small population and high proportion of economically disadvantaged residents in Algona. c. Per the King County Comprehensive Plan, Policy F-228, essential public facilities should be sited "equitably so that no racial, cultural or socioeconomic group is unduly impacted" and "siting should consider equity, environmental justice and environmental, economic, technical and service area factors." There is no evidence in the DEIS that socioeconomic impacts or equity or environmental justice was considered in the process of screening sites or in the analysis of impacts of the build alternatives. d. Per King County Comprehensive Plan, Policy F-230, siting analysis for new facilities shall include "an analysis of the potential social and economic impacts and benefits to jurisdictions receiving or surrounding the facilities" (part c) and 11an analysis of economic and environmental impacts, including mitigation" (part f) shall be included in the siting analysis. There is no indication in the DEIS of how such analysis was conducted or how the Algona and Auburn alternatives were ranked relative to these criteria.	Cost and economic impacts are not topics analyzed under SEPA and therefore are not addressed in the FEIS. SEPA contemplates that the general welfare, social, economic and other requirements and essential considerations of state policy will be taken into account in weighing and balancing alternatives and in making final decisions. The EIS is not required to evaluate and document all of the possible effects and considerations of a decision or to contain the balancing judgments that must ultimately be made by decision makers. See WAC 197-11-448 for relationship of an EIS to other considerations including socioeconomics. During the site selection process, racial and cultural groups and socio-economic groups (i.e., low-income) were considered in the review. Economic and Equity and Social Justice studies for the SCRTS are being prepared separately from the SCRTS EIS and will be a component of the decision making process for siting the transfer station.

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A-10 (Algona)	General Comment Applicable to Entire DEIS Chapter 1	Selection of the Algona site as the preferred alternative is not consistent with multiple Functional Criteria of the "South County Recycling and Transfer Station Siting, Functional Criteria," developed by the King County Solid Waste Division, August 2012; multiple Community Criteria of the "South County Recycling and Transfer Station Siting, Community Criteria," developed by the Siting Advisory Committee, August 15, 2012; and one criterion of the "South King County Recycling and Transfer Station Siting, Pass/Fail Criteria," developed by the King County Solid Waste Division, August 2012 described below. The community criteria are generally described in the DEIS as having been considered by the '"Siting Advisory Committee," but this process was only vaguely described in the "public involvement during siting" section (DEIS Section 1.3.2). a. Functional Criterion 2.1: "Site is appropriately zoned and consistent with local area land use plans" (Comment: Algona site is zoned for heavy commercial use and as open space/critical areas). b. Functional Criterion 2.8: "Site contains a manageable amount of critical areas" (Comment: Algona site contains two wetlands and a stream, all of which would be permanently and directly impacted by the facility, in contrast to the Auburn site, which would not impact any critical areas). c. Functional Criterion 2.15: "Topography of developable area of the site is flat or gently sloping" (Comment: Algona site would require geotechnical analysis to address the erosion hazard, liquefaction hazard, and landslide hazard areas that encompass the entire Algona site, in contrast the completely flat Auburn site). d. Functional Criterion 2.12 and Community Criterion 3.3: "Site has potential access to rail" and "Easy connections to rail (for fifty year life span of facility)" (Comment: Algona site is not accessible by rail, in contrast to the Auburn site, which is accessible by rail). e. Functional Criterion 2.19 and Community Criterion 3.1: "Site is not a key component of a city's or community's economic development plan(s)" and "economic vitality of community is not adversely affected" (Comment: Algona site is commercially zoned and thus a key component of Algona's future economic development plans). f. Community Criteria 3.6: "Creates a benefit to host city'1 (Comment: No information is presented as to how this criterion was applied to any of the sites during screening process or how either Algona or Auburn would benefit from the siting of the facility within their boundaries). g. Community Criterion 3.19 and Pass Fail Criterion 1.4: "Site is free of historical, archeological, or cultural designations" (Comment: Insufficient data collection has occurred at both alternative sites to determine compliance with these criteria).	Section 1.8 describes the preferred alternative rationale. The *SCRTS Siting Report* with Addendum (King County 2015b) delineates the methodology used for identifying and evaluating the viability of prospective sites. As noted in the *Siting Report*, "[i]t is unlikely any one site will meet all functional criteria—there is no perfect site." Each criterion's relative importance must be considered in order to identify suitable sites. The *SCRTS Siting Report* with Addendum (King County 2015b) is posted on King County's SCRTS website.
A-11 (Algona)	General Comment Applicable to Entire DEIS Indirect Impacts	Insufficient analysis of indirect impacts; no methods are presented for the analysis; the analysis fails to consider closure of the Renton facility once a new south county facility is completed as an indirect impact of the proposed Action Alternatives, as described on page 21 of the County's *Solid Waste Transfer and Waste Export System Plan* (Approved by King County Council 12-10-07 as the *Solid Waste Transfer and Waste Management Plan*).Because closure of the Renton facility is tied to the proposed action of siting and opening new facilities, the closure should be included in the analysis of indirect impacts of the proposed action.	SEPA does not require a specific methodology for identifying indirect impacts. As required, the FEIS describes potential indirect impacts by element of the environment.

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			It is unlikely that demand in the South County solid waste service area would change noticeably as a result of the closure of the Renton station. Users are more likely to travel to nearer stations at Bow Lake or Factoria. This was not determined to be an indirect impact.
A-12 (Algona)	General Comment Applicable to Entire DEIS Cumulative Impacts	Insufficient analysis of cumulative impacts for all alternatives; no methods presented for the analysis; no inclusion of any specific reasonably foreseeable future actions (e.g. widening of SR 167 adjacent to Algona alternative location).	The SEPA Rules (WAC 197-11) provide no specific definition of "cumulative impacts," although the term is used in several places. SEPA case law applies the concept very restrictively and defines cumulative impacts as the impacts of the proposal along with the impacts of other actions that are virtually compelled or made inevitable as a result of the proposed action. Cumulative impacts are identified for each element of the environment in the EIS. Construction timing of the SR 167 widening would not overlap construction of the SCRTS. However, the FEIS addresses the cumulative effects of widening on transportation and other relevant elements of the environment.
A-13 (Algona)	General Comment Applicable to Entire DEIS Summary	DEIS does not have a Summary. Per the SEPA Rules (WAC 197-11-440(4)) (below), a Summary is required. Elements of a Summary are provided in 2.3 and 2.4, but these are part of Chapter 2 of the DEIS (Alternatives) rather than a stand-alone Summary section of the DEIS. A summary is also necessary to clarify the comparative impacts and specify mitigation measures that proposed to reduce intensity and duration of the impacts disclosed for the build alternatives. *(4) Summary. The DEIS shall summarize the contents of the statement and shall not merely be an expanded table of contents. The summary shall briefly state the proposal's objectives, specifying the purpose and need to which the proposal is responding, the major conclusions, significant areas of controversy and uncertainty, if any, and the Issues to be resolved, including the environmental choices to be made among alternative courses of action and the effectiveness of mitigation measures. The summary need not mention every subject discussed in the DEIS, but shall include a summary of the proposal, impacts, alternatives, mitigation measures, and significant adverse impacts that cannot be mitigated. The summary shall state when the DEIS is port of a phased review, if known, or the lead agency is relying on prior or*	The FEIS is updated to include a Summary chapter prior to Chapter 1.

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		future environmental review (which should be generally identified). The lead agency shall make the summary sufficiently broad to be useful to the other agencies with jurisdiction.	
A-14 (Algona)	Fact Sheet	The required permits and approvals for both action alternatives are combined. The table does not illustrate the permits and approvals that would be required for each action alternative.	There is commonality in the permit requirements of both jurisdictions. The permits required by Auburn and Algona are listed in the Required Permits and Approvals (Table 1-2). Alternatives 1 and 2 are introduced in Chapter 2. There is only one Action Alternative in each city.
A-15 (Algona)	1.2: Purpose and Need for the Project	Section 1.2: This section states that the Solid Waste Transfer and Waste Management Plan "sets forth the need for a new south county transfer station to be placed in service." This Plan states that the Renton facility will be closed when a new facility is built. Because closure of the Renton facility is tied to the proposed action, the closure should be included in the project description and the impact analyses in the DEIS. This is an indirect impact that is not disclosed in the DEIS.	The *Solid Waste Transfer and Waste Management Plan* (2006) proposed to construct four new transfer stations and close three existing transfer stations when replacement capacity is available. We do not anticipate this facility to replace capacity for Renton. There is minimal overlap of the service area (see Figure 1 of the *SCRTS Siting Report* with Addendum (King County 2015b)). Users are more likely to travel to nearer stations at Bow Lake or Factoria.
A-16 (Algona)	1.2: Purpose and Need for the Project	Section 1.2: This section states that the current facility fails 5 of the 6 level of service criteria and refers to Table 1-1. This statement is inaccurate. Table 1-1presents 17 LOS criteria, and the existing facility meets 8 criteria in full, partially meets 3 criteria, and fails 6 criteria.	The statement says that "The existing transfer station failed to meet five of the six level-of-service criteria dealing with station capacity." The 17 LOS criteria are not all related to station capacity.
A-17 (Algona)	1.3: Siting Process	Section 1.3: The DEIS fails to explain the factors used to determine the top 2 ranked sites that are considered in the DEIS. 31 sites were considered originally; 5 potential sites emerged from focused area screening. Yet the 2 potential sites that were advanced both require conditional use permits, despite land use compatibility cited specifically as a ranking criterion in the focused area screening.	See Response A-4.
A-18 (Algona)	1.4: Required Permits and Approvals	Section 1.4: The required permits and approvals for both action alternatives are combined. The table does not illustrate the permits and approvals that would be required for each action alternative.	See Response A-14.
A-19 (Algona)	1.6: Public Involvement & Consultation Odor, Noise Property Values Traffic	Section 1.6: The simple summary of "common comments" received over four extended scoping comment periods during three years, which are (1) odor and noise concerns for residences, (2) property value concerns for residences/businesses, and (3) traffic concerns, is too general to capture appropriately and accurately the diversity of the scoping comments. For example, the City of Algona submitted 28 comments on scoping during the fourth scoping comment period in 2015-these comments extended beyond odor/noise, traffic, and property values.	The Scoping Summary Report is added as Appendix A to the FEIS.

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A-20 (Algona)	1.6: Public Involvement & Consultation Property Values	Section 1.6: Property value concerns is noted as a common comment and yet the DEIS presents no consideration of socioeconomic or economic impact to the host city (Algona or Auburn), despite using economic considerations such as collection costs, compaction costs, and "cost and regional policies" as considerations in the decision to identify Alternative 2 (Algona site) as the Preferred Alternative.	See Response A-9.
A-21 (Algona)	1.7: Station Decommission -ing	Section 1.7: This section, concerning the closure and decommissioning of the existing station, is vague and unclear. The DEIS should disclose if station decommissioning is part of Alternatives 1 and 2, to adequately assess potential impacts in Chapter 3 and to identify measures to mitigate project impacts. This section does not commit to station decommissioning as part of Alternative 1 and/or Alternative 2. Therefore, the DEIS is unable to evaluate properly the impacts of Alternatives 1 and 2.	Section 1.7 of the FEIS includes reference to the Action Alternatives for improved clarity.
A-22 (Algona)	1.8: Preferred Alternative	Section 1.8: The justification for the Preferred Alternative is vague. For example, for Algona Alternative 2, the DEIS states, "No commercial waste hauler collection routes would need to be changed so no additional collection cost would be incurred." The DEIS fails to discuss whether haul costs would go down with Alternative 1 (Auburn), although it is closer to the Auburn population center and closer to SR 18 and to the Cedar Hills landfill for travel of King County trucks.	See Response A-7.
A-23 (Algona)	2.1: Alternatives Considered	Section 2.1.1: The No Action Alternative is not clearly defined relative to operating the facility "as long as feasible." There is no definition or information regarding how long the existing station could continue to operate. A 2-year window until closing is very different than a 10-year window. This section also states that a recent roof replacement has "extended the life of the transfer building." The impacts of the action alternatives cannot be compared to an undefined baseline.	It is unknown how long the existing Algona Transfer Station will continue to operate. The Action Alternatives are only able to be compared to the continued operation of the No Action Alternative.
A-24 (Algona)	2.1: Alternatives Considered	Section 2.1.1: The No Action Alternative section lacks sufficient information to provide a comparison between Alternatives 1 and 2. Most information is not a description of the alternative, but rather information to inform the project need. Information about the alternative (such as the operational life of the existing facility and any related construction activities [e.g. structural rehabilitation of the pilings]) should be provided. Chapter 3 consistently states that "no construction activities are anticipated" for the No Action Alternative. Thus Section 2.1.1 should describe if there are construction activities associated with the No Action Alternative.	See Response A-5.
A-25 (Algona)	2.1: Alternatives Considered	Section 2.1.1: The No Action Alternative indicates that under this option the County would not site any new station in the south county service area and that transfer services would "no longer be offered within the south county area". The No Action Alternative as thus defined is inconsistent with the County's Solid Waste Transfer Plan's requirement to "geographically distribute transfer stations throughout the county to equitably serve all customers."	See Response A-5.
A-26 (Algona)	2.1: Alternatives Considered	Section 2.1.3: West Valley Highway pavement overlay and frontage improvements are described as part of Alternative 2 (Algona). The mitigation table in Chapter 2 (Table 2- 3) and sections of Chapter 3 describe these actions as measures to mitigate project impacts. These actions are either part of Alternative 2 or measures to mitigate Alternative 2 impacts, but cannot be both.	Section 2.1.3 of the FEIS describes frontage improvements and pavement overlay as part of Alternative 2. References to these improvements have been removed from Section 3.12.4.3

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			consistent with the response to comment A-8.
A-27 (Algona)	2.1: Alternatives Considered	Section 2.1.3: Overall, the Alternative 2 (Algona) description does not describe what would happen with the existing station (closure and decommissioning) and the existing land of the site. Section 1.8 in Chapter 1 provides insufficient information to determine if decommissioning is part of Alternatives 1 and 2. See previous comment on Section 1.7.	See Response A-5.
A-28 (Algona)	2.1: Alternatives Considered	Sections 2.1.2 and 2.1.3: The photographs and analysis included in the DEIS indicate construction on Alternative 1 (Auburn) site would be less complex and impact fewer resources. The Alternative 1 site is flat and paved, and the single wetland is oriented such that.it is outside the area proposed for construction. The Alternative 2 site, in contrast, has 2 wetlands, a stream, steep slopes, and requires significant expense for road improvements and overlays, which would not be required as part of Alternative 1.	Comment acknowledged.
A-29 (Algona)	2.2: Elements Common to Alternatives 1 and 2	Section 2.2.1: The stated goal for King County is to achieve a 70 percent recycle rate. However, commercially hauled residential recycling materials in south Puget Sound go to the JMK facility in Tacoma. King County facilities only collect recycling from private haulers. Yard waste collected by Waste Management goes to Cedar Grove. The DEIS should state, based upon other transfer stations, how much recycling is brought to the existing station from private haulers and how much recycling is dumped at the transfer station as trash due to the lack of recycling facilities at the existing station.	King County's goal is to achieve a 70 percent recycling rate throughout the county in the solid waste service area, as described in the Strategic Climate Action Plan. The 70 percent recycling rate is used to project future overall tonnage and the decrease in truck trips at the SCRTS. Recycling is achieved through a multitude of methods and not all recycling goes through a transfer station.
A-30 (Algona)	2.2: Elements Common to Alternatives 1 and 2	Section 2.2.2: LEED (green standards) is described within the project description for both Alternative 1 and Alternative 2. It is also described as mitigation in Chapter 3. These actions/design approaches are either incorporated in the project design as a component of the Alternatives or are measures to mitigate impacts, but cannot be both.	See Response A-8.
A-31 (Algona)	2.3: Summary of Potential Environmental Impacts	Section 2.3: Construction impacts presented in Table 2-3 are higher for Alternative 2 (Algona site) than the No Action and Alternative 1 (Auburn site) in the following areas: earth, air, odor, GHGs, water resources [groundwater and streams], vegetation and wetlands, and wildlife and fish. Although the lead agency may choose a preferred alternative which is not the least impactful, the DEIS does not provide sufficient justification for the identification of the Algona site as the preferred alternative given the impacts anticipated.	See Response A-7
A-32 (Algona)	2.4: Summary of Potential Mitigation Measures	Section 2.4: Mitigation for impacts is uniformly vague and non-specific. SEPA requires mitigation to be something that can be understood as "reasonable and capable of being accomplished" and "likely to protect or enhance environmental quality"; generic assertions that mitigation will resolve the disclosed impacts of the Preferred Alternative to the point that impacts are equivalent between the alternatives are insufficient. Selection of Alternative 2 (Algona site) would result in low to moderate impacts to earth, water resources [groundwater and streams], vegetation and wetlands, and wildlife and fish. The proposed mitigation does not indicate the manner or nature of proposed mitigation or how it	See Response A-8.

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		will specifically reduce impacts; it only states that the mitigation will be refined during design and permitting.	
A-33 (Algona)	2.4: Summary of Potential Mitigation Measures	Section 2.4: Overall comments on impacts and mitigation for Chapter 3 (below) also apply to Table 2-3.	Comment acknowledged.
A-34 (Algona)	2.5: Summary of Significant unavoidable adverse Impacts	Section 2.5: No information is presented to justify the statement that none of the alternatives is anticipated to result in significant unavoidable adverse impacts.	Section 2.5 refers to elements of the environment in Chapter 3 to clarify the conclusions.
A-35 (Algona)	2.6: Summary of Indirect and Cumulative Impacts	Section 2.6: Changes in "land use and economic vitality" are given as examples of indirect impacts; both of these types of impacts could occur, but are not presented in any of the discussion of indirect impacts of the alternatives.	See Response A-9.
A-36 (Algona)	2.6: Summary of Indirect and Cumulative Impacts	Section 2.6: No methods for determining or analyzing potential indirect impacts are included in the DEIS.	SEPA does not require a standardized methodology for identifying indirect impacts. As required the FEIS describes potential indirect impacts by element of the environment where appropriate.
A-37 (Algona)	2.6: Summary of Indirect and Cumulative Impacts	Section 2.6: No methods for determining or analyzing potential cumulative impacts are included in the DEIS.	SEPA does not require a standardized methodology for identifying cumulative impacts. As required the FEIS describes potential cumulative impacts by element of the environment where appropriate.
A-38 (Algona)	2.6: Summary of Indirect and Cumulative Impacts	Section 2.6: No reasonably foreseeable future actions are presented or considered and there is no analysis of cumulative impacts for any of the alternatives in the DEIS.	See Response A-37.
A-39 (Algona)	2.6: Summary of Indirect and Cumulative Impacts	Section 2.6: Indirect and cumulative impacts are not the same. Table 2-4 presents the impacts as if they are the same.	Table 2-4 in the FEIS specifies whether an impact is indirect or cumulative where appropriate.
A-40 (Algona)	2.8: Alternatives Considered but not Advanced	Section 2.8: The DEIS does not explain why the 31 potential sites or the 5 alternative sites that were advanced through to focused area screening were not advanced to consideration in the DEIS.	See Response A-4.
A-41 (Algona)	General Comment	The Indirect and Cumulative discussions address only general impacts/benefits. The cumulative discussion does not include analysis/review of other projects; therefore, the discussions are insufficient and comparisons of the totality of impacts of the alternatives are incomplete.	See Responses A-36 and A-37.

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	Applicable to all of Chapter 3		
A-42 (Algona)	General Comment Applicable to all of Chapter 3	The documentation of the methods used for analyzing most of the resources is brief or missing. Therefore, there is no disclosure for what is considered a direct impact and indirect impact for each resource. Several sections state there are no indirect impacts, but the definition and methods to evaluate indirect impacts are not provided. Overall, the indirect analysis is vague, missing, and/or dismissive, and therefore deficient.	See Response A-36. The Final EIS contains a discussion of indirect and cumulative impacts as required by SEPA, for each relevant environmental element.
A-43 (Algona)	General Comment Applicable to all of Chapter 3	There are general, unsupported findings throughout the chapter, such as "No indirect or cumulative impacts to [resource] are anticipated." These are unsupported findings and therefore deficient.	See Responses A-36 and A-37.
A-44 (Algona)	General Comment Applicable to all of Chapter 3	There are mitigation measures listed that are not mitigation or are too vague to be implemented. The measures do not identify responsibility for mitigation or timing of mitigation.	See Response A-8.
A-45 (Algona)	General Comment Applicable to all of Chapter 3	The past, present, and reasonably foreseeable future actions for the cumulative analysis are not provided for most sections. For this reason, the cumulative analysis cannot be vetted and is deficient.	See Response A-37.
A-46 (Algona)	General Comment Applicable to all of Chapter 3	Many sections state: "No construction activities are anticipated for the No-Action Alternative." The No-Action Alternative description should describe whether there are construction activities. To state "anticipated" is unclear.	See Response A-5.
A-47 (Algona)	General Comment Applicable to all of Chapter 3	The impact findings consistently state that an impact "is anticipated." This language is unclear and vague and does not describe who is doing the anticipating or what is anticipated.	Comment acknowledged.
A-48 (Algona)	General Comment Applicable to all of Chapter 3	Many sections of Chapter 3 fail to explain the method of data collection or analysis of impacts.	The methods of data collection or analysis of impacts in Chapter 3 of the FEIS are presented where they would help the reader understand the approach.
A-49 (Algona)	3.1: Earth	Section 3.1.3: Geological hazard areas are present on the Alternative 2 site (Algona site), but not on the Alternative 1 site (Auburn site), yet impacts at each site are considered similar due	Geological hazard areas for the Alternative 1 site are described in Section 3.1.2.2 of the FEIS. Specific effects to

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		to unspecified geotechnical analysis yet to be performed. Impacts cannot be compared in the DEIS based on future analysis.	geological hazard areas will be determined during design and construction.
A-50 (Algona)	3.1: Earth	Section 3.1.2: An expanded discussion related to nearby faults (with distances to the site) and (associated) potential for fault rupture is necessary to appropriately characterize the geologic setting.	Information about faults are added to Section 3.1.2 of the FEIS as appropriate, including the Seattle fault zone and Tacoma fault zone.
A-51 (Algona)	3.1: Earth	Section 3.1.2.1: Figure 3.1-1 does not support the claim that "the region is comprised mainly of Vashon advance outwash deposits."	The surface geology shown on Figure 3.1-1 are subunits of Qva. This is clarified in Section 3.1.2.1 in the FEIS.
A-52 (Algona)	3.1: Earth	Section 3.1.2.3: The disclosure that there are geologically hazardous areas and that the western side of the Alternative 2 (Algona) site is identified as having a moderate to high liquefaction susceptibility, steep slopes in excess of 40%, and a risk of landslide and erosion hazards that "would require mitigation is not sufficient to determine the degree of risk associated with developing a facility at this site, or to determine the potential for risks to the residential properties located to the west, above the facility at the top of the slope.	A geotechnical and critical areas report will be prepared during design of the transfer station as described in Section 3.1.4 of the FEIS.
A-53 (Algona)	3.1: Earth	Section 3.1.3.1: Given the difference in site geometry and topography between Alternatives 1 & 2, and because the DEIS discusses moving Algona Creek tributary and filling wetlands in connection with Alternative 2, the assumption that the same amount of fill and grade will occur for both sites (95,000 CY cut and 35,000 CY fill) is illogical.	Specific cut and fill quantities would not be known until design and construction of the new facility. Approximations of cut and fill provided in the FEIS are typical quantities that were determined from conceptual site planning as stated in the FEIS.
A-54 (Algona)	3.1: Earth	Sections 3.1.3.1 and 3.1.4.2: The high susceptibility of alluvial soils to settle is mentioned under the affected environment for the Alternative 1 site (Auburn site), but is not discussed specifically with regard to direct impacts or mitigation measures. Although this issue will ultimately be evaluated (and potentially mitigated) as a result of future geotechnical studies, further discussion (in the sections mentioned) is necessary to compare the relative impacts of the two Alternatives compared to the baseline (No Action Alternative).	Potential impacts and mitigation are described for liquefaction soils on the Alternative 1 site in the FEIS.
A-55 (Algona)	3.1: Earth	Section 3.1.3.1: The presence of steep slopes, soils on the western side of the site with "moderate to high liquefaction susceptibility", and the presence of soft or liquefiable soils at Alternative 2 (Algona site) and the potential resultant need for "deep foundations" is presented, but no analysis of the potential for impacts to the slope itself or to residential properties to the west at the top of the slope is presented.	See Response A-52.
A-56 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.2.1: The description of the affected environment for the No Action Alternative should include loaders and transfer vehicles. Some estimate of the amount of time that diesel equipment operates, as well as the amount of delay experienced by customer vehicles using the facility, should be included. Also, some surrogate level of information should be provided regarding fugitive dust emissions due to lack of a mechanical ventilation system (possibly the manufacturer of such a system can provide this information), in combination with the surface area of the waste material.	There are no loaders used for the No Action Alternative; the FEIS is updated to include the use of other vehicles, including transfer vehicles. A qualitative assessment of typical operating equipment, traffic back-ups, and typical existing sources of air pollution are

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			provided in Section 3.2.2 of the FEIS. Fugitive dust levels vary by load and are actively management by on-site staff. Fugitive dust management under the No Action Alternative is described in Section 3.2.2.1.
A-57 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.2.3: The description of the affected environment for the Alternative 2 (Algona) site does not address the proximity of residences at the top of the slope to the west of the facility. Information from residents immediately west of the south end of the Alternative 2 site indicates the presence of a strong updraft of air from the valley to their home at the top of the slope which currently transmits odors from the existing station and is strong enough to facilitate toy airplanes staying aloft for long periods of time due to the updraft. These residents have expressed concern regarding odors emitted from the new station being detectable and affecting their properties. The DEIS considers only the potential for construction dust and vehicle emissions as sources of odors, but similarly does not address odors from the transport vehicles going in and out of the building and the potential for exhaust odors to reach their homes.	Sections 2.2.2 and 3.2.3.1 of the FEIS provide greater detail regarding the operational potential for odor impacts.
A-58 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.2.2: The description of the existing setting for Alternative 1 (Auburn site) Greenhouse Gases is incomplete, and needs to include sensitive land uses such as the hotel and residences located within 750 feet of the site to the northeast and the two ball fields and park located adjacent to the proposed facility entrance.	Section 3.2.2.2 is revised to address in more detail surrounding land uses.
A-59 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.1: The significance of impacts due to the increase in truck trips under the No Action Alternative needs to be discussed.	Section 3.2.3.1 compares the existing operations with that of a modern transfer station. No increase in truck traffic is anticipated for the No Action Alternative.
A-60 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.1: In regards to air quality impacts of operation, the only comparative statement for Alternative 2 is that: "Despite the same trip generation for Alternatives 1 and 2, the percent impact for Alternative 2 during the Saturday peak hour is anticipated to be higher because of lower traffic volumes on West Valley Highway South." Comparison also needs to be made to the No-Action Alternative.	A comparison of traffic volumes for the No Action Alternative and Alternatives 1 and 2 is added in Section 3.2.3.1 under *No Action Alternative, Operation.*
A-61 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.1: The impact of emissions due to not having compacting capabilities should be quantified.	See Response A-59.
A-62 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.1: There is insufficient information to conclude that air quality impacts "are anticipated to be negligible." The discussion regarding air quality impacts during operation only addresses sources of emissions; it does not characterize emissions to support the conclusion of negligible impacts.	Information on diesel generating vehicles and odor complaints is added to Section 3.2.3.1 to characterize emissions. GHG emissions are quantified.
A-63 (Algona)	3.2: Air, Odor, and	Section 3.2.3.1: There is no information to conclude that impacts from dust and odor "are anticipated to be negligible." The analysis needs to describe sources of dust and odor and to characterize the emissions, in order to support the conclusion of impact significance.	Sources of dust and odor are provided in Sections 3.2.1, 3.2.2, and in Section 3.2.3.1 for all alternatives.

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	Greenhouse Gases		
A-64 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.1: The analysis only refers to transportation, which is a transportation analysis, not an air quality analysis.	Section 3.2.3.1 addresses multiple sources of potential air quality impacts, including but not limited to transportation sources.
A-65 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.2: The analysis of indirect impacts under all three alternatives is incomplete. Indirect impacts could result from customer travel distance/times, which differ between the Alternatives.	Each alternative would serve the South County service area. Customer travel distance/times would vary depending on origin to each alternative site. This distance is relatively minor in comparison to the South County service area.
A-66 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3.2: There is no analysis of cumulative impacts under all three alternatives. An impact decision should be made and supported for each of the alternatives.	Section 3.2.3.2 address indirect and cumulative impacts for all alternatives.
A-67 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.3 (general): Discussion of BMPs, design features, etc., needs to reference these measures as mitigation [to the extent that they are mitigation for specific impacts which would occur) and include a cross-reference to the mitigation section.	Consistent with the response to A-8, mitigation measures are revised in Chapter 3 where appropriate.
A-68 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.4 (general): Each mitigation measure needs to characterize the nature and scale of impacts remaining after mitigation, before saying in the following section that there would be no unavoidable impacts.	See Response A-8.
A-69 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.4: Fuel-related mitigation measures are not considered. At a minimum, biodiesel could be proposed for on-site loaders and yard tractors to reduce GH emissions. If this equipment was powered by natural gas and/or electricity, the emissions within the enclosed transfer facility, and in a particular diesel PM, could be reduced substantially, thus reducing customer exposure.	Fuel related mitigation measures are added to Section 3.2. Section 3.6 of the FEIS describes the county's energy efficient goals including using alternative fuels, to the extent practicable, as technology and funding allows.
A-70 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.4: To reduce the emissions of GHG and air pollution emissions, newer construction equipment that meet most recent EPA standards could be used. This "Green" Construction Policy has been adopted by a number of authorities throughout the country.	See response A-69.
A-71 (Algona)	3.2: Air, Odor, and Greenhouse Gases	Section 3.2.4.1: Some of the mitigation measures are also described in the alternative descriptions in Chapter 2. These are either part of Alternatives 1 and 2 or part of mitigation, not both.	See Response A-8.
A-72 (Algona)	3.2: Air, Odor, and	Section 3.2.4.1: Complying with required regulations is not mitigation. Best management practices that are required as part of a permit unrelated to project impacts is also not	See Response A-8.

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	Greenhouse Gases	mitigation. This section needs to clearly state the proposed mitigation to mitigate project impacts.	
A-73 (Algona)	3.3: Water Resources	Section 3.3.1.2: There is no mention of the following state laws that could apply to the DEIS: • Washington State Water Pollution Control Act, RCW Chapter 90.48 • Aquatic Resource Mitigation, RCW Chapter 90.74 • Hydraulic Code, RCW Chapter 77.54	Applicable state laws are added to Section 3.3.1.2 in the FEIS as appropriate.
A-74 (Algona)	3.3: Water Resources	Section 3.3.2.1: There is no discussion of groundwater quality at the existing Station (which is relevant because decommissioning will occur).	Existing groundwater quality at the No Action Alternative site is described in Section 3.3.2.1. Potential groundwater contamination at the No Action Alternative site is described in Section 3.8.2.1. Requirements for operation and closure of transfer stations are described in Section 1.5.2 of the FEIS.
A-75 (Algona)	3.3: Water Resources	Section 3.3.2.2 (4th paragraph): This section references work done in the year 2000 to support the statement that: "Based upon WHPAs designations, the Alternative 1 site falls within groundwater Protection Zone 3 per the Auburn Municipal Code Chapter 16.10, because the site overlies the region between the 5-year and 10-year time-of-travel zone of wells owned by the City of Auburn (Figure 3.2-2). Zone 3 prohibits hazardous waste treatment, storage or disposal of recycling facilities that accept, store or use hazardous materials." Based upon recent work completed by Robinson & Noble for Auburn (2014), Alternative 1 (Auburn site) is not within a 10-year travel time. The DEIS should reflect this updated data and remove the erroneous information. Consequently the implication that siting the facility at the Alternative 1 site is prohibited based upon a wellhead protection area is incorrect and should be removed. Auburn staff confirmed in February 2016 that the wellhead delineations shown on Figure 1 (August 2014) of the Robinson & Noble report have not changed.	The Robinson Noble 2014 report has been reviewed and conclusions added to the FEIS. As the current Auburn Municipal Code still cites WHPAs from the Pacific Groundwater Group report from 2000, this information has been retained in the FEIS.
A-76 (Algona)	3.3: Water Resources	Section 3.3.2.2: There is no definitive statement regarding groundwater water quality for the Alternative 1 (Auburn) location, as the Section states: "The site may require additional subsurface testing due to chemicals released by Auburn Boeing Plant." Given the ambivalence in the groundwater discussion, additional data must be provided to appropriately determine if this topic would affect construction or operation of the facility at this location.	Sections 3.3 and 3.8 of the FEIS present known conditions below the Alternative 1 site from previous and ongoing investigations by Ecology. Additional analysis of potential impacts and mitigation have been incorporated into the FEIS in Chapter 2 and Section 3.3 Water Resources.

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A-77 (Algona)	3.3: Water Resources	Section 3.3.2.3: This Section states that Alternative 2 (Algona site) is in an area with "high susceptibility for groundwater contamination," but also states the Auburn Boeing Plant plume, relative to direction of groundwater flow, reaches the area adjacent to the Alternative 2 site. The DEIS should be clear as to whether existing or future groundwater contamination is an issue.	Section 3.3.2.3 states that: "Chemicals released in the past from the Auburn Boeing Plant are approximately 0.3 miles east of the Alternative 2 site and State Route 167 near the intersection of Algona Boulevard N and 11th Avenue N. The plume is migrating to the northwest and groundwater flow and data do not indicate that contamination in groundwater reaches the West Valley Highway South area adjacent to the Alternative 2 site.[1]"
A-78 (Algona)	3.3: Water Resources	Section 3.3.3.1: More analysis is needed regarding groundwater impacts for the No Action Alternative and Alternative 1, given the statement in Section 3.3.2.2 that "chemicals released in the past by the Auburn Boeing Plant may have contaminated into groundwater underlying the Alternative 1 site in the intermediate and deep zones 40 to 100 feet below ground surface." Additional data must be provided to appropriately determine if contamination at this depth would affect construction or operation of the facility at the Auburn location.	Section 3.8.3.1 provides relevant data on potential groundwater contamination at the Alternative 1 site.
A-79 (Algona)	3.3: Water Resources	Section 3.3.3.1: With regard to Alternative 2, this section states that "effects to Algona Creek and wetlands on site could impact local groundwater recharge..." However, this section also states that "groundwater recharge impacts are anticipated to be temporary and minor." These statements are inconsistent, and lack any explanation or analysis.	Section 3.3.3.1 is revised to clarify that temporary, localized groundwater recharge impacts would not adversely affect overall recharge of the aquifer.
A-80 (Algona)	3.3: Water Resources	Section 3.3.3.1: This section does not quantify stream impacts or make any statement regarding the potential impacts to water quality or associated habitat associated with the stream. This section simply states the stream will be enhanced with mitigation, without describing the actual stream impacts, the type of mitigation, or the mitigation details. Based on this section, a decision-maker would be unable to determine whether the mitigation will be "reasonable and capable of being accomplished," as required by SEPA.	See response T-2.
A-81 (Algona)	3.3: Water Resources	Section 3.3.3.2: This section simply states that Alternative 2 may cause indirect impacts on Algona Creek and downstream waters, but does not describe what those indirect impacts might be. This section only states that such indirect impacts will be considered in project design and mitigation. Where indirect impacts are not known or described, it is impossible to consider them in the project design.	Potential indirect impacts are clarified in Section 3.3.3.2.
A-82 (Algona)	3.3: Water Resources	Section 3.3.4.3: SEPA requires mitigation to be reasonable and capable of being accomplished; it also provides that mitigation measures must be likely to protect or enhance environmental quality. The mitigation statement for the Algona Creek does not provide this certainty. This section only states that "opportunities to improve stream habitat conditions" will be explored during design. There is no reasonable assurance that mitigation will mitigate the impacts to stream habitat, quality and function.	The language referenced in this comment is revised and moved to Section 3.3.3.1. Also see response T-2.

[1] Robin Harrover, Hazardous Waste Specialist, Ecology, PDEIS scoping comment email, November 10, 2015.

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A-83 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.1.2: This section should include reference to: • Washington State Water Pollution Control Act, RCW Chapter 90.48. • Aquatic Resource Mitigation, RCW Chapter 90.74.	Applicable state laws are added to Section 3.4.1.2 in the FEIS as appropriate.
A-84 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.2.2: This section states that wetland categories can be estimated, but acknowledges that the category of wetland must be known in order to determine mitigation that meets mitigation ratios of local municipal codes. Wetland categories in a DEIS need to be known, with all questions answered in the DEIS to the greatest extent possible. The lack of property access to the Alternative 1 site prevents an accurate analysis of the comparative impacts of the Alternatives.	Section 3.4.2.2 is updated for greater clarity on use of the wetland rating system.
A-85 (Algona)	3.4: Vegetation and Wetlands	Sections 3.4.2.2 and 3.4.2.3: There is no discussion of the sources of water that support wetland hydrology at the Alternative 1 and Alternative 2 locations. Analysis of potential indirect impacts to wetlands relative to surface water or groundwater support requires information of the sources of wetland hydrology, in order to determine both direct and indirect impacts from the construction and operation of the project.	Hydrologic inputs for wetlands at the Alternative 1 and Alternative 2 sites are added to Sections 3.4.2.2 and 3.4.2.3.
A-86 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.2.3: This section needs data regarding the range of size (height, dbh, approximate age) of the forested canopy vegetation to inform the issue of the quality of wildlife habitat that vegetation may provide.	Additional information on the habitat characterization is provided in Section 3.5.2.3. Figures 3.4-1 and 3.4-2 also provide aerial imagery that shows the extent of the forest canopy.
A-87 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.3.1: Discussion of vegetation impacts for Alternative 2 should describe the size/age of trees, so that the impact of removal of trees in the forested portion of the site on the quality of the habitat and impacts to wildlife species can be determined (See Section 3.5.3.1).	See response A-86.
A-88 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.3.1: For Alternative 2, this section fails to disclose the impacts on Wetlands A B and other than stating that Wetland A will be permanently filled and Wetland probably will be filled. This section fails to discuss how the filling will affect hydrology, water quality and habitat. The functions to be lost need to be disclosed so the decision-makers will know what functions must be replaced with the mitigation proposed, and how that mitigation will compensate for the loss of the Wetlands.	Section 3.4.4.3 states that potential wetland and buffer impacts and mitigation would be further refined during design and preparation of the critical areas report, as addressed in response T-2.
A-89 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.4.3: This section states that the "relocation of Algona Creek ... may be able to support the creation of an additional wetland area on the site." This statement lacks a definitive and specific action to compensate for impacts to the Creek and for loss of wetlands. The phrase "may be able to support," combined with the statement that a "detailed hydrologic analysis would have to be conducted ...," are inconclusive and therefore insufficient to support a "reasonable and capable" mitigation action. What if the relocation does not support additional wetland? There is no assurance that relocation of the creek is a reasonable and capable mitigation measure (as required by SEPA) to compensate for the creek relocation or impacts to wetlands and associated buffers.	See response T-2.
A-90 (Algona)	3.4: Vegetation and Wetlands	Section 3.4.4.3: In this section, there is no discussion of the specific functions that wetlands provide at the Alternative 2 site (Algona), or of whether those functions can be compensated by use of an in-lieu fee program, or of why on-site mitigation is not feasible (as required by	See response T-2.

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		Algona City Code). Mitigation acreage should be based on the Algona City code ratios for wetlands, and buffers required for those mitigation wetlands. Algona's critical areas ordinance also requires a description of buffer impacts and how those impacts will be compensated.	
A-91 (Algona)	3.5: Wildlife and Fish	Section 3.5.2: This section should provide data from WDFW's Priority Habitat Species database for any known or recorded sensitive animals, plants, or natural resource communities.	Data from the Washington Department of Fish and Wildlife Priority Habitat and Species database is included in Sections 3.4.2.1, 3.5.2.1, 3.5.2.3 and related sections of the FEIS. See reference Washington Department of Fish and Wildlife (WDFW) 2015a in the Chapter 4, References. Other sources cited include Salmonscape (WDFW 2015b), Department of Natural Resources (DNRP).
A-92 (Algona)	3.5: Wildlife and Fish	Section 3.5.2: Anecdotal observations of wildlife during winter/spring site visits from 2013 are not necessarily indicative of the extent of wildlife use, particularly relative to species protected under the Migratory Bird Treaty Act.	Comment acknowledged.
A-93 (Algona)	3.5: Wildlife and Fish	Section 3.5.2.3: This section should provide information regarding tree size (age, height, dbh), should identify any standing dead wood such as branches, snags, or downed wood, and should discuss whether any other unique habitat features are present.	See Response A-86.
A-94 (Algona)	3.5: Wildlife and Fish	Section 3.5.3.1: Impacts related to wildlife connectivity/movement corridors is not assessed for the Alternative 2 (Algona) site, despite acknowledgment in Section 3.5.2.3 that the western slope of the site is a WDFW mapped priority habitat biodiversity area and corridor and that this area provides wildlife connectivity to the urban greenbelt area along the western slopes of the valley.	Section 3.5.3.1 is revised to clarify why there would be negligible to minor impacts. Figure 2-3 illustrates the proposed buildable area.
A-95 (Algona)	3.5: Wildlife and Fish	Section 3.5.3.1: Stating that "any vegetation clearing would occur during the 'nonbreeding season for birds"' is a very general statement and not sufficient to describe project construction. Birds' breed at various and overlapping times of the year, ranging from late winter through very late summer.	Section 3.5.3.1 is revised to clarify this issue.
A-96 (Algona)	3.5: Wildlife and Fish	Section; 3.5.3.1: This section states that mitigation for Wetlands A and B at Alternative 2 (Algona site) "would be an improvement over existing conditions." However, this section does not provide any mitigation details as to what will be done to ensure wetland area and functions can be mitigated on-site; it also fails to discuss whether, if the functions cannot be mitigated on site, an in-lieu fee program would compensate for those impacts and how an in-lieu fee program would be consistent with the Algona Code. Also, this section does not state how mitigation can compensate for temporary impacts.	See response A-8.
A-97 (Algona)	3.5: Wildlife and Fish	Section 3.5.3.1: The potential for "loss of open channel habitat or an unknown length of stream channel" is acknowledged relative to Alternative 2 (Algona site), but no information regarding the impacts of such loss of stream habitat or length on Algona Creek and downstream waters relative to fish and wildlife habitat is included.	See response A-8.

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A-98 (Algona)	3.6: Energy and Natural Resources	Section.3.6.3.1: The conclusion in this section that there are "no impacts" to energy supplies during operation of a station on the Alternative 1 or the Alternative 2 sites is inaccurate. The transfer facility would consume energy and therefore have an energy impact. The analysis should compare the action Alternative impacts rather than only impacts to the regional supply. The findings in this section overall are vague and unsupported by the analysis.	Section 3.6.3.1 is updated to clarify that, while operations under Alternative 1 and Alternative 2 would consume energy, there would be no impact on overall energy supplies or the capacity of local or regional providers to meet demands in the service area because energy requirements under the Action Alternative is a fraction of a percent of average annual energy use. Section 3.6.3.1 states that Alternative 2 would have the same impacts on energy resources as Alternative 1.
A-99 (Algona)	3.7: Noise	Section 3.7 (general): In this section there are two categories of impacts: "regulatory compliance" and "impact analysis." For clarity, the two categories of impacts should be named "regulatory compliance" and "ambient increase," as both categories are treated as impacts for purposes of mitigation.	Comment acknowledged. Clarification of the noise modeling methodology and terms used in the FEIS are provided in Section 3.7.2.1.
A-100 (Algona)	3.7: Noise	Section 3.7 (general): The term "negligible" needs to be used consistently where applicable to describe impact significance, instead of "none" or "no impact."	Comment acknowledged.
A-101 (Algona)	3.7: Noise	Section 3.7.2.1: The paragraph beginning at bottom of page 3-97 is repeated after Table 3.7-2.	Duplicative paragraph deleted.
A-102 (Algona)	3.7: Noise	Section 3.7.2.1 (Page 3-98, 2"' paragraph from bottom): This paragraph states that "The regulatory compliance assessment scenario includes sound level predictions ... " This statement only needs to say that regulatory assessment looks at project generated noise emissions to determine compliance with regulatory standards. On-site vehicle traffic would be included in the project noise emissions, assuming the traffic is generated by the project. Also, it would be clearer to state that the "noise impact" analysis assesses increases to ambient noise levels, including project-related and non-project related sources.	This paragraph in Section 3.7.2.1 and the preceding paragraph are revised to clarify the parameters of the regulatory compliance and noise impact assessment scenario, and to clarify that on-site traffic is included in the regulatory compliance assessment scenario were only modeled where the receiving properties are zoned as residential or rural in the King County Ordinance, as vehicles operated off of public roadways are exempt when received in commercial or industrial zones.
A-103 (Algona)	3.7: Noise	Section 3.7.2.3: The land use discussion for Alternative 1 is incomplete, and needs to include descriptions of outdoor use areas, such as the two ballfields adjacent to the proposed facility entrance. There is also a preschool to the south across 1s•h Street SW and a Best Western hotel to the northeast.	All potentially impacted land uses are described in Section 3.7.2.3. Comment acknowledged.
A-104 (Algona)	3.7: Noise	Section 3.7.2.4: This section indicates that the residential properties to the west are "significantly elevated above the Alternative 2 (Algona) site, on top and set back from the ridge of a large bluff." Homes west of the south end of the facility are obscured by the legend of Figure 3.7-3, and the proximity of these residences is not considered relative to the potential	Section 3.7.2.4 describes the proximity of residential properties to the Alternative 2 site. Section 3.7.3.1 addresses operational

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		for noise generated from transport vehicles going in and out of the building to generate noise distinguishable from the background noise of motor vehicles on SR 167.	noise impacts for Alternative 2 including noise from transport vehicles.
A-105 (Algona)	3.7: Noise	Section 3.7.3.1: This section, for both Alternatives, concludes that sound levels (noise) would be similar to past construction projects. This conclusion is speculative and vague, especially in view of the fact that noise levels caused by construction equipment change from project to project.	It is not possible to know what specific equipment will be used by the contractor or what the site layout will be at this stage. However, it is reasonable to assume that sound levels will be consistent with other construction projects since the same regulatory criteria for construction sound emissions apply. An expanded discussion of typical construction equipment and sound levels within 50 feet is added to the FEIS.
A-106 (Algona)	3.7: Noise	Section 3.7.3.2: There is no analysis of indirect impacts under any of the three Alternatives. An impact determination should be made and supported for each of the Alternatives.	No indirect impacts are anticipated.
A-107 (Algona)	3.7: Noise	Section 3.7.3.2: There is no analysis of cumulative impacts under any of the three Alternatives. An impact determination should be made and supported for each of the Alternatives. Cumulative impacts should not be lumped together with indirect impacts; each should have a separate analysis.	No cumulative impacts are anticipated.
A-108 (Algona)	3.7: Noise	Section 3.7.4.2: The first paragraph of this section states that mitigation measures listed in the section would be "considered." The proposed mitigation measures should be provided in the DEIS.	The FEIS is updated. Noise generated during development and operation of this project will comply with the appropriate local noise ordinance. More detailed noise analysis will be performed during project design to minimize potential noise impacts and ensure regulatory sound level limits are not exceeded at receiving properties. If project design, such as site layout and design features to reduce noise levels, does not reduce noise levels at receiving properties sufficient to meet regulatory requirements, additional noise mitigation would be developed and implemented to meet regulatory requirements. Noise mitigation could include perimeter noise walls or other noise mitigation methods. Also see response A-8 regarding mitigation measures.

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A-109 (Algona)	3.7: Noise	Section 3.7.4.3: The mitigation discussion is inadequate. The DEIS should provide a higher level of detail to inform the decision-makers of the necessary mitigation, and should not defer identification of mitigation to design of the transfer station. In other words, the DEIS should describe the timing and performance standards of the proposed mitigation measures, and should identify who is responsible for implementing the mitigation measures. If mitigation measures are not defined generally, then the DEIS should provide a general mitigation measure that would require King County to coordinate with and seek the approval from the City of Algona for any noise mitigation that is identified after the SEPA process.	See Response A-8.
A-110 (Algona)	3.7: Noise	Section 3.7.5: Without appropriate mitigation measures, this section cannot conclude that there are no significant unavoidable adverse impacts due to noise. Table 3.7-6 identifies noise impacts. No mitigation has been defined or committed to by the DEIS with regard to those noise impacts. Absent mitigation measures, a transfer station on the Alternative 2 site would have a significant and adverse impact.	Section 3.7.4 identifies potential noise mitigation measure(s) to address unavoidable noise impacts.
A-111 (Algona)	3.8: Hazardous Materials	Section 3.8.2.1: The existence of 3 monitoring wells installed by AMEC in January 2014 to determine depth to groundwater and recharge rates and the results of the data collected from these wells is not presented in the description of existing conditions at the No Action Alternative site in Algona. The depth to groundwater (see Comments #73, 76, and 78) could be more accurately disclosed with this data. These wells were disclosed in the November 24, 2014 Phase 1 Environmental Site Assessment for the Algona Transfer Station (AMEC 2014) which is cited as a reviewed document in the DEIS. Data regarding depth to groundwater and recharge rate should be presented and discussed in the final EIS, along with data collected in 2016 relative to groundwater flow direction, volatile organic compounds (VOCs), pesticides/herbicides, total metals, and NWTPH-HCID, including pentachlorophenol, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and PCBs. These data will allow for a more complete understanding of the groundwater flow regime and the distribution and concentration of dissolved-phase chemicals should they be present.	Section 3.8.2.1 of the FEIS under *Regulatory Review, Previous* Reports, is updated to include information about the monitoring wells. King County is not aware of any 2016 monitoring data, and none is cited in the EIS.
A-112 (Algona)	3.8: Hazardous Materials	Section 3.8.2.2: There are no prior environmental studies/reports (i.e. Phase I ESAs) available to support the analysis for Alternative 1. Considering the historic land uses/environmental history of the Alternative 1 site, the lack of such information is a data gap that prevents a comparison of the relative impacts of the two Alternatives compared to the baseline (No Action Alternative).	Best available information, including from Ecology, was used to make a reasonable comparison of the alternatives in the FEIS. For Alternative 1, this included detailed historical and existing conditions assessment and regulatory review of previous reports and agency databases. This information is available at http://www.ecy.wa.gov/programs/hwtr/cleanupSites/boeing-fabn/index.html.
A-113 (Algona)	3.8: Hazardous Materials	Section 3.8.2.2: The Auburn General Depot (military site) is identified as existing in the southern portion of the Alternative 1 site during the 1940s. Further detail regarding the functions of the depot and types of materials stored on-site during that time is necessary to compare the relative impacts of the two Alternatives compared to the baseline (No Action Alternative).	Results from review of the EDR report, Ecology databases, and field visits for the Alternative 1 site are presented in Table 3.8-2.

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A-114 (Algona)	3.8: Hazardous Materials	Section 3.8.2.2: This section discloses that an underground storage tank (UST) existed on the Alternative 1 parcel during the late 60s and early 70s, but it was not located. This section also states, however, that location of the UST within the Alternative 1 site footprint is unlikely. This conclusion is not supported by data or analysis.	Section 3.8.2.2 also states that the UST was not located on the portion of the parcel associated with the project. The sentence is updated in the FEIS to state that it is not located on the Alternative 1 site.
A-115 (Algona)	3.8: Hazardous Materials	Section 3.8.2.2: This section states that no historical evidence of on-site USTs or ASTs was observed from the public ROW. Given the size of the site, observations only from the ROW are not sufficient to determine the potential occurrence of USTs or ASTs, and thus the potential for impacts from any such features.	Section 3.8.2.2 is updated to include all methods used in the analysis.
A-116 (Algona)	3.8: Hazardous Materials	Section 3.8.3.1: Under the Direct Impacts discussion, this section states that there is a low risk from known historical farming and railroad use on the Alternative 1 site. This determination is not supported by data or analysis.	Table 3.8-2 states that there are no reported spills, hazardous material storage and use, or NPDES violations on-site. These findings were used in the determination.
A-117 (Algona)	3.8: Hazardous Materials	Sections 3.8.3.1 and 3.8.4.2: These sections state that TCE-contaminated groundwater could have a low to moderate impact during construction at the Alternative 1 site (Auburn site). Per the analysis found in the Geology section for Alternative 1: "The maximum amount of excavation needed could be around 20 feet deep. Shoring, flattening of slopes, and/or dewatering may be needed depending on the depth of excavation. At the Alternative 1 site, groundwater is anticipated to be present at depths of 8.5 to 14 feet below the ground surface. "Similarly, Section 3.3.2.2 states that "chemicals released in the past by the Auburn Boeing Plant may have contaminated into groundwater underlying the Alternative 1 site in the intermediate and deep zones 40 to 100 feet below ground surface." Additional data must be provided to appropriately determine if contamination at this depth would affect construction or operation of the facility at the Auburn location and if a mitigation measure including the characterization of onsite groundwater (similar to what is proposed for preconstruction soil characterization) is warranted.	Sections 3.8.3.1 and 3.8.4.2 are revised to specify the anticipated depth for excavation and additional analysis in potential impacts and mitigation. The SCRTS Operating Plan would address TCE monitoring and public health and safety as appropriate.
A-118 (Algona)	3.8: Hazardous Materials	Sections 3.8.4.2 and 3.8.4.3: Under "Other mitigation measures proposed for hazardous materials" for both Alternatives, pre-construction soil characterization to assess soil management and disposal requirements is a proposed mitigation measure for both Alternatives. No detail is presented as to what type(s) of soil characterization would be performed (e.g., would the characterization include soil sampling? Where would soil characterization be performed?)	Mitigation measures are updated in the FEIS in Section 3.8 as appropriate. Measures that are BMPs, regulatory requirements, or part of the proposed action have been incorporated into the impacts sections Soil characterization will follow applicable state and local regulations and guidelines during the design phase. Soil characterization will be accomplished through geotechnical analysis (on-site and laboratory analysis), including borings and/or test pits.

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A-119 (Algona)	3.8: Hazardous Materials	Section 3.8.4.3: Under Direct Impacts (3.8.3.1), the DEIS states that although the Phase I ESA did not identify Recognized Environmental Conditions (RECs) associated with the existing Algona Transfer Station, there is some risk of encountering soil contamination, Asbestos Containing Materials (ACM) and Lead Based Paints while decommissioning the Alternative 1 site. Mitigation measures (i.e. contaminated media contingency plans, ACM and LBP surveys, etc.) addressing these potential impacts were not included in Section 3.8.4 *Mitigation Measures*.	As referenced in Section 3.8.3, measures for deconstruction are added to the FEIS.
A-120 (Algona)	3.9: Land Use	Section 3.9.1.3: Policies F-226 through F-230 of Chapter 8, Section II, Subsection G of the King County comprehensive plan, which relate to Essential Public Facilities, are quoted in 3.9.1.3.These policies must be satisfied by the new transfer station. • F-226 states that a new essential public facility should be sited consistent with the King County comprehensive plan. This section fails to discuss how the new transfer station is consistent with this Policy. • F-227 states that King County and neighboring counties should share essential public facilities to increase efficiency of operation, if advantageous to both. This section fails to discuss whether there is a transfer station in vicinity in Pierce County, and to mention any discussions between King County and Pierce County regarding the sharing of transfer stations. • F-228 states that King County should strive to site essential public facilities equitably so that no socio-economic group (among other groups) is unduly impacted by the facilities. This section lacks any discussion of the impact of the transfer station on the socio-economic group composed of Algona or Auburn low-income citizens. • F-230 states that a siting analysis for a proposed new essential public facility must consist of, among other things, an analysis of the potential social and economic impacts and benefits to jurisdictions receiving or surrounding the facility. This section lacks such an analysis, including but not limited to the social and economic impacts and benefits of Alternative 2 on the City of Algona. • F-230 states that a siting analysis for a proposed new essential public facility must consist of, among other things, an analysis of a proposal's consistency with policies F-226 through F-229. The DEIS lacks such an analysis of consistency with these policies. • F-230 states that a siting analysis for a proposed new essential public facility shall consist of, among other things, an analysis of economic impacts of a new site under consideration. While the DEIS states that economic analysis occurred during "the siting process used to identify the alternatives", there is no indication in the DEIS of the results of such analysis nor is there any analysis in the DEIS indicating consideration of economic or socioeconomic impacts to the host city of the facility or its residents.	Comment acknowledged. Policies F-226 and F-227 were some of the policies used to guide the site selection process described in Section 1.3, the *Solid Waste Facility Siting Plan* and the *Comprehensive Solid Waste Management Plan*. See Response A-9 related to F-228 and F-230.
A-121 (Algona)	3.9: Land Use	Section 3.9.1.3: The Transfer Plan states that transfer stations are most compatible with light industrial or commercial uses and least compatible with residential parcels. Sites that impact residential uses would be considered less desirable. As noted.in the Noise section, Alternative 2 has noise impacts on residential uses to the west, which are zoned residential (R-1). As defined on page 3-141, the R-1 designation is generally applied to urban land on or adjacent to sensitive	The use is consistent with the Transfer Plan, which states, “Depending on the land use patterns, [transfer stations] may be in proximity to residential areas.” (See Appendix C, Page 10). Residents to the

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		land uses, wildlife habitat areas, or regionally and locally significant resource areas. Therefore, the selection of Alternative 2 (Algona site) as the preferred alternative is inconsistent with the Transfer Plan because it would site the facility adjacent to residential land uses.	south and west would be buffered from the transfer station by distance, vegetation, steep slopes, and roadways. Any potential impacts to residents would be mitigated to the extent practicable. The *SCRTS Siting Report* with Addendum (King County 2015b) states that active area would be approximately 100 feet or more from the nearest residence, which was one of the 20 functional criteria applied.
A-122 (Algona)	3.9: Land Use	Section 3.9.2.2: This Section quotes land use policies from the Auburn comprehensive plan (CF-71 through CF-74), presumably for the purpose of demonstrating that such policies must be satisfied by the new transfer station. The ability to satisfy such policies is an important consideration in the question of whether Alternative 1 or Alternative 2 is the most viable alternative. This section fails to discuss whether these land use policies are satisfied.	Consistency with comprehensive plans is described for each alternative in Section 3.9.3.1.
A-123 (Algona)	3.9: Land Use	Section 3.9.2.3: This section states that a conditional use permit and building height variance is needed for the Alternative 2 site (Algona). The Alternative 2 (Algona site) would also require acquisition of right of way by the County from the City of Algona. These aspects reflect greater changes in land use for the Alternative 2 site (Algona) than for the Alternative 1 site (Auburn).	Comment acknowledged. Section 2.1.3 addresses the vacation of the rights-of-way. Both jurisdictions may require building height variances.
A-124 (Algona)	3.9: Land Use	Section 3.9.2.3: This section mentions that Algona has adopted King County planning policies for essential public facilities, including CFP 4.5, which is composed of guidelines for analyzing essential public facilities. The DEIS fails to discuss or analyze any of the CFP 4.5 guidelines, such as whether the new transfer station will accommodate public facility demands based upon adopted LOS standards.	Section 3.9.3.1 responds to CFP 4.5 guidelines for Alternative 2, in a consistent method as Alternative 1. Adopted LOS standards are specific to CFP 4.5(e), which apply to developer-provided public facilities.
A-125 (Algona)	3.9: Land Use	Section 3.9.2.3: The Existing Land Use subsection of this section states that the Alternative 2 site contains a landscape supplier that is in operation. The economic impact of displacing this business should be addressed in this section.	The landscape supplier is operating under a short-term lease. Prior to signing the lease, the tenant was aware of the potential future site development. Economics is not an element of the environment under SEPA.
A-126 (Algona)	3.9: Land Use	Section 3.9.2.3: The decommissioning and deconstruction of the existing station would change land use. Therefore, to state there are no land use impacts is not accurate.	Section 3.9.2.3 does not acknowledge a change in land use since this is unknown.
A-127 (Algona)	3.9: Land Use	Section 3.9.3.1: This section includes statements that an analysis of impacts to low- income and minority populations and economic analyses were conducted during the siting process. This is not, but should be, incorporated into the DEIS.	See Response A-9.
A-128 (Algona)	3.9: Land Use	Section 3.9.3.1: Auburn must approve a conditional use permit for the new transfer station. • This section quotes the decision criteria for Auburn conditional use permits. One criterion is that the proposal complies with all requirements of "this title," which is the	Consistency with the comprehensive plan is described for Alternative 1 in Section 3.9.3.1. Compliance with the zoning title

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		Zoning title of the Auburn Code, consisting of 35 chapters. This section fails to explain how the transfer station proposal complies with the Zoning title of the Auburn Code. • This section quotes the general evaluation criteria for approving an essential public facility. o One criterion is that the facility is consistent with the Auburn comprehensive plan. This section fails to explain how the transfer station is consistent with the comprehensive plan. o Another criterion is whether careful analysis has been completed to show that siting of the facility will have no undue impact on any one racial cultural or socio-economic group. This section merely answers that racial and cultural groups and socio-economic groups (i.e., low income) were considered in the review. This section needs to discuss in detail the aspects of that review, so that the two Alternatives can be reasonably and intelligently compared.	will occur as part of the permitting process. See Response A-122 concerning compliance with the Auburn Comprehensive Plan. See Response A-9 concerning socioeconomics. Socioeconomics are one of the functional criteria comprising the siting process. More detailed information about the siting process is included in the referenced *SCRTS Siting Report* with Addendum (King County 2015b) posted on King County's SCRTS website.
A-129 (Algona)	3.9: Land Use	Section 3.9.3.1: This section states that existing buildings "may be demolished." This possibility should be defined in the project description so that the impacts and permits/approvals are disclosed in the DEIS.	Sections 1.7, 2.2.2, and 3.9.3.1 are updated to provide clarification that the existing station would be closed and decommissioned and possible deconstructed under either Action Alternative.
A-130 (Algona)	3.9: Land Use	Section 3.9.3.1: The "Compatibility with Existing Land Use" for the Alternative 2 (Algona) site does not disclose that the residential land uses to the west of the Alternative 2 site would be incompatible with the transfer station. The text only states that land uses would be compatible with land uses to the north.	Section 3.9.3.1 is updated to discuss in more detail the residential land uses to the west.
A-131 (Algona)	3.9: Land Use	Section 3.9.3.1: The response to the second criterion for an Auburn conditional use permit, which states that the proposal must be in accordance with the goals, policies and objectives of the Auburn comprehensive plan, is incomplete. This response should identify the relevant goals, policies and objectives, and discuss how the transfer station would meet these goals, policies and objectives.	Consistency with the comprehensive plan is described for Alternative 1 in Section 3.9.3.1 of the FEIS.
A-132 (Algona)	3.9: Land Use	Section 3.9.3.1: The "Consistency with Comprehensive Plan" subsection relating to Alternative 2 (Algona site) does not discuss how Alternative 2 would be consistent with the Algona comprehensive plan. The subsection only summarizes a statement from the plan that the City's top priority is the reconstruction of West Valley Highway, and that this could occur as part of construction of a new transfer facility. This section should identify the relevant goals, policies and objectives of the Algona comprehensive plan, and discuss how the transfer station would meet these goals, policies and objectives.	See Response A-122.
A-133 (Algona)	3.9: Land Use	Section 3.9.3.1: Algona must approve a conditional use permit for the new transfer station. This section quotes the decision criteria for Algona conditional use permits. One criterion is that the transfer station would generally meet the objectives of the comprehensive plan and zoning	See Response A-122.

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		code. The response to this criterion fails to identify and discuss the relevant goals, policies and objectives of the comprehensive plan and the requirements of the zoning code.	
A-134 (Algona)	3.9: Land Use	Section 3.9.3.2: Similar to many other sections of the DEIS, this section states that no indirect land use impacts are anticipated for both Alternatives, and that no cumulative impacts are anticipated for both Alternatives. These conclusions are not supported by any reasonable information, arguments or data, and in the case of indirect impacts for Alternative 2, the conclusion of no indirect impact is supported only by bare conclusion.	No potential indirect or cumulative land use impacts were identified relative to the existing built up conditions surrounding the site and reasonably foreseeable projects in the vicinity.
A-135 (Algona)	3.9: Land Use	Section 3.9.3.2: The indirect impacts only address construction indirect impacts; operations indirect impacts are not addressed. In addition, the rationale for the finding is not provided; the section does not state why it is "unlikely'' that intensification of land uses would not occur. This section also fails to mention that Alternative 2 would remove commercial land within Algona, and the indirect impact to Algona of the removal of commercial land and the potential need to accommodate planned commercial uses elsewhere in Algona. In addition, this section does not address the potential for Alternative 2 to induce other development in the vicinity of the transfer station. For these reasons, the indirect impacts analysis is deficient.	The indirect impacts discussion for Alternative 2 Land Use are revised in the FEIS. The use of the land is a direct impact and is addressed in Section 3.9.3.2.
A-136 (Algona)	3.9: Land Use	Section 3.9.3.2: This section states that it is unlikely that construction of a transfer station on either Alternative site would result in intensification of land uses "in the vicinity'' of the site, and that there are no reasonably foreseeable future projects that have been identified "in the vicinity.'' Because the "vicinity" is not defined, the conclusion that there are no reasonably foreseeable future projects and that there would not be an intensification of land uses is not supported.	It is not required to define a cumulative impacts study area under SEPA. Vicinity generally means the area near or surrounding the site where potential indirect or cumulative impacts may occur and would affect each other.
A-137 (Algona)	3.10: Visual Quality	Section 3.10.2.4: Other than selection of viewpoints relative to "a general overview from all cardinal locations around the site," there is no justification for the selection of viewpoints, particularly selection of Viewpoint 2C, when residences at the end of 7th Avenue North could have a more unobstructed view of the Alternative 2 site; similarly the photo of Viewpoint 2D shows the Vista Point subdivision on the bluff above the proposed site and yet the residences in the Vista Point subdivision are not included as a Viewpoint for Alternative 2, despite their proximity.	Viewpoint 2-C captures a different direction from 2-D on 8th Avenue N. The view from 7th Avenue N would be similar to 2-D looking west. The Vista Point subdivision is represented in 2-A and 2-B.
A-138 (Algona)	3.10: Visual Quality	Sections 3.10.2.3 and 3.10.2.4: No Viewpoints relative to the land uses immediately north of the Alternative 1 and Alternative 2 sites are included in the analysis.	As described in Section 3.10.2.1, "Viewpoints were selected to provide varying distances from the site. All viewpoints were confined to publicly accessible locations within the rights-of-way or on public property." A viewpoint directly from the north did not meet these parameters.
A-139 (Algona)	3.10: Visual Quality	Section 3.10.3.1: The decommissioning and deconstruction of the existing site does not address the temporary alteration in visual quality during construction from equipment and operations.	Section 3.10.3.1 is updated to address temporary alterations.
A-140 (Algona)	3.10: Visual Quality	Section 3.10.3.1: The impacts analysis for Alternative 2 is incomplete. Certain viewpoints of the Alternative 2 site that are obscured by existing buildings or vegetation should not have been selected as viewpoints. Viewpoints should be of the Alternative 2 site, not obstructed	As described in Section 3.10.2.1, "Viewpoints were selected to provide varying distances from the site. All

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		viewpoints. For this reason, the visual analysis is deficient and statements regarding degree of impact are not supported by the analysis.	viewpoints were confined to publicly accessible locations within the rights-of-way or on public property."
A-141 (Algona)	3.10: Visual Quality	Section 3.10.3.1: On page 3-186, this Section states that temporary alterations to the view due to construction equipment would occur from Viewpoints 2E and 2F; no such Viewpoints are previously discussed in Chapter 3.10.	Section 3.10.3.1 is updated to address correct viewpoints.
A-142 (Algona)	3.10: Visual Quality	Section 3.10.3.1: Another section of the DEIS states that "a substantial amount of vegetation may be removed from the site at the wetlands, Algona Creek Tributary 09.0054A, along West Valley Highway South, and from disturbed soils and fill material. Revegetation would be limited by site development area." That statement does not indicate the extent to which such vegetation removal could affect changes in visual quality, for example by removing wetland and riparian vegetation along West Valley Highway South that currently obscures Viewpoints 2C and 2D.	Section 3.10.5.3 is updated to acknowledge changes to viewpoint 2D due to vegetation removal.
A-143 (Algona)	3.10: Visual Quality	Section 3.10.3.1: On page 3-188, the section states that views of the Alternative 2 site are obscured by vegetation and existing residences at Viewpoints 2A and 2B, which indicates that 1) these viewpoints are obscured and thus not are not valid Viewpoints, and 2) there are closer residences to the site which could more accurately be used to analyze the potential for a change in visual quality, e.g. residences at the western terminus of 7th and/or 9th Avenue North.	Comment acknowledged. As described in Section 3.10.2.1, "viewpoints were selected to provide varying distances from the site. All viewpoints were confined to publicly accessible locations within the rights-of-way or on public property."
A-144 (Algona)	3.10: Visual Quality	Section 3.10.4: Compliance with the requirements per King County regulations or Algona Municipal Code is not mitigation. For measures that are mitigation, the timing of the measures and the responsible party must be provided; they are not provided here.	See Response A-8.
A-145 (Algona)	3.11: Cultural Resources	Section 3.11.1: This is a SEPA document and there is currently no federal nexus. Thus, including reference to federal laws governing cultural resources (i.e. Section 106) is informative, but unnecessary, and confuses matters.	Although there is currently no federal nexus, it is anticipated that a Nationwide USACE Section 404 permit will be obtained, and consequently, Section 106 compliance may be required for the project.
A-146 (Algona)	3.11: Cultural Resources	Section 3.11.1.2: The description of SEPA as it applies to cultural resources is a gross oversimplification of the requirements and inadequate, especially when compared with the greater detail provided for Section 106 discussed in the previous section, as Section 106 does not apply.	Additional information is added to Section 3.11.1.2 in regards to SEPA requirements and cultural resources. Section 106 may apply. See response A-145.
A-147 (Algona)	3.11: Cultural Resources	Section 3.11.1.3: This section fails to mention King County's laws governing the protection of cultural resources; it only mentions some of the administrative processes.	Additional information is added to Section 3.11.1.3 regarding King County executive orders governing the protection of cultural resources.
A-148 (Algona)	3.11: Cultural Resources	Section 3.11.2.1: The description of WISAARD and the Historic Property Inventory (HPI) in the first paragraph is not entirely accurate. WISAARD does not just "depict locations" of previously recorded resources; it also serves as the on line repository for this documentation. Also, the HPI is a part of WISAARD and not a separate database, and the description of the HPI is inaccurate. The HPI is more than imported tax assessor data.	The description of WISAARD is revised insection 3.11.2.1.

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A-149 (Algona)	3.11: Cultural Resources	Section 3.11.2.1: In the last paragraph, the insertion of a specific response to a public comment received during scoping is out of place; it would be better to integrate this information into the description of the research/fieldwork methodologies.	Section 3.11 of the FEIS is revised.
A-150 (Algona)	3.11: Cultural Resources	Section 3.11.2.1: It appears that little if any fieldwork was conducted to identify cultural resources in the study area. This section explains that a windshield survey was conducted, which would be useful only in identifying built environment resources. However, there is no description of the methods used to identify or record archaeological or built environment resources, or the methods used to analyze potential impacts on these resources. In fact, there is no description of the methods used for the consideration of archaeological resources at all.	The methodologies for cultural resources evaluation for each alternative are detailed in Section 3.11.2. Commitments to performing site-specific archaeological field investigations during project design are clarified in Section 3.11.3.1.
A-151 (Algona)	3.11: Cultural Resources	Section 3.11.2.1: The study area for cultural resources is not defined.	Section 3.11.2.1 describes the methodology for evaluating cultural resources for each alternative.
A-152 (Algona)	3.11: Cultural Resources	Section 3.11.2.1: There is no mention of efforts to consult with DAHP or affected Tribes about the project.	Scoping and FEIS notices were distributed to both agencies. See Section 1.6, Public Involvement and Consultation, and Chapter 6, Distribution.
A-153 (Algona)	3.11: Cultural Resources	Section 3.11.2.2 (Ethnographic Context): To protect sites from looting and vandalism, archaeological sites are exempt from public disclosure consistent with Washington State Statute RCW 42.56.300 and federal statute 16 U.S.C. 470w-3(a). **All site-specific archaeological information is restricted and must be redacted or removed from this document.** This would include detailed information about the location and details of ethnographic sites, which is generally considered to be sensitive and privileged information. The ethnographic section needs to be generalized or removed, so as not to include site-specific information.	Records or maps identifying the specific locations of ethnographic sites are not disclosed in the FEIS. No locational information of any kind is provided in the table summaries. All information in Section 3.11.2.2 was summarized from references available to the public.
A-154 (Algona)	3.11: Cultural Resources	Section 3.11.2.2: There is no pre-contact context, which is necessary for the evaluation and consideration of archaeological resources.	Section 3.11.2.2, Ethnographic Context, includes pre-contact context.
A-155 (Algona)	3.11: Cultural Resources	Sections 3.11.2.2 and 3.11.2.3: The lengthy detail of the context sections is not necessary in a SEPA DEIS and can be summarized or left out entirely, with references made to more detailed information in an associated technical report.	Comment acknowledged.
A-156 (Algona)	3.11: Cultural Resources	Section 3.11.2.4: Again, to protect sites from looting and vandalism, archaeological sites are exempt from public disclosure consistent with Washington State Statute RCW 42.56.300 and federal statute 16 U.S.C. 470w-3(a). **All site-specific archaeological information is restricted and must be redacted or removed from this document.** This includes the listing of specific archaeological sites (Table 3.11-2) and ethnographic places (Table 3.11-6) and references to prior archaeological studies (Table 3.11-1). For the purposes of this DEIS, this information (as well as the built environment information) should be quantified and only generally summarized in this chapter, with the more detailed information provided in a redacted technical report.	See response A-153.
A-157 (Algona)	3.11: Cultural Resources	Section 3.11.2.4: For comparative purposes, the "previously recorded" information needs to be broken out by Alternative site.	Comment acknowledged. Relevant information updated in Section 3.11.2.4.
A-158 (Algona)	3.11: Cultural Resources	Section 3.11.2.5: No archaeological investigations have been conducted at the existing transfer station site, and the existing station has not been evaluated to determine its NRHP/WHR eligibility. There is also no assessment of pre-contact archaeological sensitivity. The section's	The No Action Alternative described in Section 3.11.2.5 would result in the continuation of operations of the existing

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		concluding statement asserts that there is a "low probability that historic-period sites may be present because of previous disturbances from construction and operation of the existing Algona Transfer Station." However, there is no specific data presented to support this assertion. The extent and depth of ground disturbance is unknown, except for the fact that new construction on the site has occurred.	transfer station; therefore, no ground disturbance would occur. Section 3.11.3 addresses the proponent's commitment to conduct site specific cultural resources investigations at the existing transfer station during design of the project under Alternative 1 or Alternative 2. A separate cultural resources technical report will present the results of the site specific investigations. Section 3.11.2 addresses pre-contact archaeological context for all alternatives.
A-159 (Algona)	3.11: Cultural Resources	Section 3.11.2.6: No archaeological investigations have been conducted at the Alternative 1 site. It is stated that there is a high probability for historic-period archaeological resources on the site and that pre-contact archaeological resources may be present. The extent and depth of ground disturbance is unknown, except for the fact that changes to the site have occurred.	An archaeological investigation was conducted for all alternatives. The methodology for the archaeological investigation is described in Section 3.11.2.1. Also see response A-150 regarding archaeological field investigations.
A-160 (Algona)	3.11: Cultural Resources	Section 3.11.2.7: No archaeological investigations have been conducted at the Alternative 2 site. Three buildings were identified on the site. These have not been evaluated to determine their NRHP/WHR eligibility. It is stated that there is a high probability for historic-period archaeological resources on the site and that pre-contact archaeological resources may be present. The extent and depth of ground disturbance is unknown, except for the fact that changes to the site have occurred.	See response A-159.
A-161 (Algona)	3.11: Cultural Resources	Section 3.11.3: None of the built environment resources identified during the windshield survey have been inventoried or evaluated to determine their NRHP/WHR eligibility. If built environment resources have not been inventoried or evaluated, and one does not know whether they meet historically significant federal/state criteria, it is impossible to assess their potential impacts. The same is true for archaeological resources. No field investigations have been conducted to identify existing cultural resources; no field data has been used to measure the potential for cultural resources at the Alternative sites or to assess the level/extent of actual ground disturbance at the Alternative sites. Therefore, there is no basis for determining whether either Alternative has the potential to impact cultural resources. Operational impacts are not limited to the potential for further ground disturbance. Noise, vibrations, and other similar direct affects would be of equal concern.	See Response A-150.
A-162 (Algona)	3.11: Cultural Resources	Section 3.11.3: Stating that additional investigations/studies will occur prior to construction is not sufficient analysis to determine whether cultural resources might be impacted by the project, or to inform policy makers of this potential. Essentially, the analysis as presented fully	Section 3.11.3 is updated to provide greater clarity and detail.

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		relies on a desktop review of available literature. This review is only adequate for an initial screening of the Alternative sites; it is not sufficient to assess the project's potential to impact cultural resources, especially when, the results of the desktop review clearly state that cultural resources may be present. Deferring study/investigation of an Alternative site until after a site has been selected and/or the project is approved does not satisfy SEPA requirements.	
A-163 (Algona)	3.11: Cultural Resources	Section 3.11.4.1: Mitigations minimize/resolve potential project impacts to identified cultural resources. Investigations and studies that are necessary to identify cultural resources at the Alternative sites have not been completed. Therefore, there is no basis for declaring that mitigation measures are needed. Deferring study/investigation of an Alternative site until after a site has been selected and/or the project is approved is not mitigation.	See response to A-162.
A-164 (Algona)	3.11: Cultural Resources	Section 3.11.5: The DEIS cannot declare that there will be no significant unavoidable adverse impacts, where the potential for significant cultural resources at the Alternatives sites is unanswered.	No significant unavoidable adverse impacts would be incurred under the Action Alternatives with the mitigation measures described in the FEIS, summarized in Section 3.11.4.
A-165 (Algona)	3.11: Cultural Resources	Section 3.11.2.4: The analysis of the trailing paragraph should be moved to later section.	Formatting modifications to FEIS are made in response to this comment.
A-166 (Algona)	3.12 Transportation	Section 3.12.1: The statement that traffic safety issues increase proportionally is too general and unsupported. Other factors besides traffic volumes contribute to traffic safety.	The evaluation contained in the DEIS and FEIS considered the most recent 3-year collision history, calculation of intersection collision rates, 2016 Safety Priority Index System (Auburn), and impacts of the additional traffic from the three alternatives.
A-167 (Algona)	3.12 Transportation	Section 3.12.3.1: The trip generation figures in Table 3.12-14 and text associated with the table is misleading. The table implies that trip generation is limited to only new trips generated, and only new trips are illustrated. The transfer station site would change, and therefore all trips generated should be more clearly illustrated and described.	Impacts of the project are measured based on the net increase in trips at the study area intersections. However, the FEIS table is revised to better highlight the total trip generation for the sites.
A-168 (Algona)	3.12 Transportation	Section 3.12.2.2: Additional traffic counts were obtained in March 2015. Traffic volumes are lower than those presented in the July 2014 Transpo Report, indicating seasonal variation to the traffic. LOS at intersections has changed substantially since the July SEPA data. The capacity failure at Level of Service "F" has been revised. LOS "F" should force intersection capacity upgrades. Current LOS2014 & 2016 SEPA2016 DEIS W Valley & Peasley Canyon F C W Valley & 1st B A w Valley & 15th C B	The signal timing at the WVH / Peasley Canyon intersection was corrected from the previous SEPA analysis, resulting in the change noted in the comment. Traffic volumes fluctuate day to day and year to year as noted in the comment. Additional comparative analysis was conducted examining the impacts using the higher counts (2013 vs. 2015) for all intersections. The results of this analysis are provided in a stand-alone memo. The

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		Given the rapid increase traffic volumes in the Puget Sound area, there should be an explanation regarding the improvement of traffic movement.	basis for the FEIS analysis are consistent with the volumes presented in the DEIS.
A-169 (Algona)	3.12 Transportation	Section 3.12.2.3: Table 3.12-7 identifies West Valley Highway as a Class II Urban Street however, in former documents it was a Class Ill Urban Street. Because speeds are essentially the same, the change in classification is unjustified.	The current roadway classification for the section of West Valley Highway in Auburn is based on coordination with James Webb, City of Auburn (5/11/15).
A-170 (Algona)	3.12 Transportation	Section 3.12.4.3: For Alternative 2, a future traffic signal is suggested. The same could be true for the No Action Alternative. This section should analyze the impact of a traffic signal on the traffic level of service for West Valley Highway.	Mitigation is only appropriate for the Action Alternatives. Mitigation is not discussed for the No Action Alternative, but a signal could be considered in the future if traffic volumes warranted it and the operations of the driveway required it.
A-171 (Algona)	3.12 Transportation	Table 3.12-11: This table presents the projected Peak Hour Level of Service for the No Action Alternative. The projected Level of Service for the year 2020 is footnoted, indicating that the analysis for the year 2020 was not in conformance with the methodology outlined in 3.12.1.4 or in conformance with the methodology used for the year 2040. There is no explanation of the effect of this non-conformity in methodology on the comparison of the action alternatives to the No Action Alternative's baseline conditions.	The footnote restates the primary methodology used for the LOS calculations. The footnoted methodology is explained in Section 3.12.1.4.
A-172 (Algona)	3.12 Transportation	Table 3.12-11 and Table 3.12-21: These Tables predict that the level of service for exiting the existing station site and the Alternative 2 site will fall to a Level of Service "F". Table 3.12-15 indicates that there will be no future traffic capacity issues associated with the Alternative 1 site. As yet unidentified traffic capacity improvements will be required if the Level of Service falls below adopted standards.	Comment noted.
A-173 (Algona)	3.12 Transportation	Table 3.12-7: The corridor analysis in this Table should include West Valley Highway in Algona. Table 3.12-13: The corridor LOS analysis for West Valley Highway is restricted to Auburn, but the No Action Alternative is located in Algona.	Corridor LOS completed for Auburn consistent with Auburn's operational standards and monitoring. Information for West Valley Highway in Algona has been included (Table 3.12-20 & Table 3.12-25).
A-174 (Algona)	3.12 Transportation	Section 3.12.3.1: The cut and fill quantities estimated in this section for the West Valley Frontage improvements are not mentioned in Section 3.1.3.1.	Section 3.1.3.1 includes the cut and fill quantities.
A-175 (Algona)	3.12 Transportation	Table 3.12-24: The corridor analysis in this table should include West Valley Highway in front of the Alternative 2 site. It stops at Auburn City limits.	See response A-173.
A-176 (Algona)	3.12 Transportation	Section 3.12.3.1: Decommissioning and deconstruction of the existing scale complex and transfer building of existing transfer station is referred to as a possibility. As mentioned in other comments, the decommissioning and deconstruction needs to be set forth in the project description to accurately assess the proposed action and related impacts and mitigation.	See response A-21.

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A-177 (Algona)	3.12 Transportation	Section 3.12.3.1: The Decommissioning and Deconstruction section states that construction vehicles would follow a route and schedule that would avoid the peak hours as much as possible. Information supporting this conclusion and an enforcement mechanism is not provided.	Construction management plans, including approved traffic control plans, will be required by the local jurisdictions prior to construction, as addressed in Section 3.12.3.1. That process will define the operational criteria.
A-178 (Algona)	3.12 Transportation	Section 3.12.3.1: The Decommissioning and Deconstruction section states that traffic volumes due to deconstruction would be substantially less than generated by the new transfer station. This not a useful comparison, as it is comparing construction against operations. An estimate of construction traffic should be provided, similar to what has been set forth for other project elements.	Section 3.12.3.1 is updated for greater clarity.
A-179 (Algona)	3.12 Transportation	Section 3.12.3.1: The Construction section relating to Alternative 2 (Algona site) states that: ''There could be potential roadway wear and tear during construction from heavy equipment and truck hauling." The word "could" should be changed to "would," given the expected level of construction traffic.	Section 3.12.3.1 is modified as noted.
A-180 (Algona)	3.12 Transportation	Section 3.12.3.1: The trip generation discussion on page 3-249 is misleading. The discussion only references "additional" trips. While all trips would not be new, the transfer facility would be located at a new location. Therefore, all trips generated should also be discussed.	See response A-167.
A-181 (Algona)	3.12 Transportation	Section 3.12.3.1: The jurisdiction of the Alternative 2 site access would be Algona, not Auburn. This error should be corrected.	See response A-179.
A-182 (Algona)	3.12 Transportation	Section 3.12.3.1: The statement that traffic safety issues increase proportionally is too general and unsupported. Other factors besides traffic volumes contribute to traffic safety. A more thorough traffic safety analysis is needed for the Alternative 2 (Algona) site access, because a new station on the Alternative 2 site would result in substantial trip generation through a new access point that does not have a traffic signal.	Section 3.12.3.1 is updated to include an assessment based on traffic volumes, historical safety data at the existing facility, sight distance, and roadway improvements to WVH.
A-183 (Algona)	3.12 Transportation	Section 3.12.3.1: The decommissioning and deconstruction section is insufficient because it does not address operational impacts to the West Valley Highway.	See response A-178.
A-184 (Algona)	3.12 Transportation	Section 3.12.3.2: The statement that there are no cumulative transportation impacts is inaccurate. As described in the methods section, the DEIS considers cumulative traffic for 2020 and 2040.	Comment acknowledged. The statement clarified to speak to the impacts of the alternative only, within the context of the cumulative analysis.
A-185 (Algona)	3.12 Transportation	Section 3.12.4.3; Overall, the mitigation for Alternative 2 (Algona site) is inadequate. • Coordination with agencies with jurisdiction of affected intersections/roadways is required; it is not mitigation. • Road frontage improvements are identified in the Alternative 2 description of Chapter 2. These improvements are either part of Alternative 2 or mitigation for Alternative 2 impacts; they cannot be both.	Both Action Alternatives include numerous provisions described in Chapter 2 to prevent and minimize adverse environmental impacts and to maximize enhancements. Measures to be taken to address environmental impacts that have not been satisfied by project commitments and regulatory

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		• The pavement overlay is identified in the Alternative 2 description of Chapter 2. This overlay is either part of Alternative 2 or mitigation for Alternative 2 impacts; it cannot be both. • Monitoring of conditions at the site access does not indicate who will monitor conditions, how often the monitoring will occur, the threshold that will require additional action, or when a traffic signal will be warranted. • The need for mitigation at the site access point to improve safety is not known because a detailed safety analysis has not been conducted.	requirements are listed under the Mitigation Measures sections of Chapter 3 where appropriate. These mitigation measures have been revised for the Final EIS.
A-186 (Algona)	3.13: Public Services and Utilities	Section 3.13.1-This section references the City of Auburn website and the Auburn comprehensive plans, as well as the City of Algona website and stormwater management plan. There is no justification for failing to identify the Algona comprehensive plan; the Algona comprehensive plan should be referenced and included in this section.	Section 3.13.1 addresses the Algona comprehensive plan applicable to public services and utilities.
A-187 (Algona)	3.13: Public Services and Utilities	Section 3.13.1: Pursuant to SEPA guidance (as presented in the SEPA Checklist which identifies resource areas for analysis), Parks and Recreation is not a subset of Public Services and Utilities. Parks and Recreation should be presented in its own section, not in the Public Services and Utilities section.	WAC 197-11-444 states that some or all of the elements of the environment may be combined. Because parks are a public service and were determined during scoping to not be a significant issue in this project they were combined with public services and utilities.
A-188 (Algona)	3.13: Public Services and Utilities	Section 3.13.2: The entire construction impacts analysis discusses the facility, rather than the short-term, temporary impacts that are typical of a construction impacts analysis. Only in a few places are the actual construction impacts discussed (traffic routing, etc.). "Construction" impacts are not discussed specifically; rather, the impacts analysis under the Operation section is very similar to the analysis presented in the Construction section, and does not differentiate the two types of impacts.	Section 3.13.2 of the FEIS is revised to clearly differentiate between potential construction and operation impacts.
A-189 (Algona)	3.13: Public Services and Utilities	Section 3.13.2.1: The DEIS indicates only that upgrades to the utilities, if needed to supply sufficient water and wastewater storage or conveyance capacity to and from the site, shall be paid for by the applicant. This statement does not provide adequate information from which to determine the sufficiency of the existing water, sewer, and electrical utilities relative to the demand of the proposed project or to compare potential impacts to public services and utilities between the Action Alternatives.	Utility capacity and supply requirements from the project are described in Section 3.13.
A-190 (Algona)	3.13: Public Services and Utilities	Section 3.13.2.1: Contrary to the conclusion in the Fire subsection of the Construction section, the Alternative 2 impacts on fire services would not be the same as Alternative 1 impacts on fire services. Alternative 1 is located in Auburn and serviced by Station 33; Alternative 2 is located in Algona and serviced by station 38, with one less firefighter.	According to Valley Regional Fire Authority (VRFA), the services are the same for all alternatives, as described in Section 3.13.2.1.
A-191 (Algona)	3.13: Public Services and Utilities	Section 3.13.2.1: The analysis of direct impacts in this section is incomplete. The conclusions for many of the direct impacts of the Alternatives on services, such as the police, water, sanitary sewer, solid waste, electricity, natural gas, and telecommunications and cable, are unsupported	Section 3.13.2.1 is updated to clarify this analysis.
A-192 (Algona)	3.13: Public Services and Utilities	Section 3.13.2.1 The Police subsections for both Alternatives state that no impacts to police services are anticipated. However, construction and operation impacts could differ between	Section 3.13.2.1 is updated to clarify this analysis.

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		the two Alternatives due to the difference in police force size between Algona (10 staff total) and Auburn (50 officers in the patrol division alone).	
A-193 (Algona)	3.13: Public Services and Utilities	Section 3.13.2.2: The cumulative and indirect analysis is weak and does not properly set up a geographic or temporal boundary; it also does not present a list of projects located within those boundaries.	The FEIS contains a discussion of indirect and cumulative impacts for known projects for each relevant environmental element within the area of each alternative. SEPA does not require specific temporal or geographic boundaries for cumulative analysis.
A-194 (Algona)	3.13: Public Services and Utilities	Section 3.13.3: All of the mitigation measures provided are BMPS and related to short- term, temporary construction. Per the previous comment, the construction impacts are not specified in the construction impact sections for the Alternatives, and thus the impacts analysis does not support these mitigation measures.	See Response A-8.
A-195 (Algona)	3.13: Public Services and Utilities	Section 3.13.3: Overall, the mitigation measures listed in this section are inadequate. • "Coordinate with fire and police services to minimize the possibility of service disruptions during construction" is not mitigation. • "Maintaining access to emergency facilities" during construction is not mitigation. • Providing "public outreach through multiple outlets" is vague and unclear. The agency, timing, and method are not stated. • Implementation of best management practices to minimize disruptions, disturbance or impacts is not mitigation.	See Response A-8.
A-196 (Algona)	3.13: Public Services and Utilities	Section 3.13.4: The analysis of unavoidable adverse impacts overall is vague and incomplete. A determination of no significant unavoidable adverse impacts to public services and utilities cannot be made, considering the information and analysis provided in Chapter 3.13.	Section 3.13.4 of the FEIS is updated with additional documentation.
A-197 (Algona)	Table 2-2	**Table 2-2, Summary of Potential Environmental Impacts**, (Section 2.4): There is no discussion of potential impacts on groundwater or surface water relative to decommissioning the existing transfer station. The Table states that there are no groundwater impacts for Alternative 1, but the text in Chapter 3 implies groundwater impacts may exist: "The site may require additional subsurface testing due to chemicals released by Auburn Boeing Plant." The table also shows no groundwater impacts for Alternative 2, but the text in Chapter 3 implies the Alternative 2 site may be susceptible to groundwater contamination; similarly, Section 3.3.3 states that: "effects to Algona Creek and wetlands on site could impact local groundwater recharge ... "	The Summary of Potential Impacts table is relocated to the FEIS Summary. The relocated table is renumbered to Table S-2 and revised to be consistent with the structure of the analysis.
A-198 (Algona)	Table 2-4	**Table 2-4, Summary of Indirect and Cumulative Impacts**, (Section 2.6, Page 2-31): Summary of Indirect and Cumulative Impacts Table): No impacts are indicated for cultural resources under both categories. Given that there has been no effort to develop a site-specific cultural resources survey at the Alternative sites, and the existing transfer station has not been evaluated, this conclusion of no impacts is not supported.	Comment acknowledged. Indirect and Cumulative Impacts to cultural resources are revised in the Summary of Indirect and Cumulative Impacts table in the FEIS.
A-199 (Algona)	Table 3.11-4 And Table 3.11-5	**Table 3.11-4, Previously Identified Above-Ground Historic Properties within the Immediate Vicinity (0.25-Mile) of the Alternative Sites, and Table 3.11-5, Previously Identified Registered Historic Properties within 1-Mile of the Alternative Sites**, (Section 3.11.2.4): These built	Table 3.11-4 and Table 3.11-5 contain different information and therefore are presented separately.

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		environment resources should not be listed in separate tables. They are all built environment resources.	
A-200 (Auburn)	General Comment	The City of Auburn appreciates the opportunity to submit comments to the King County Solid Waste Division for the Draft Environmental Impact Statement (DEIS) for the South County Recycling and Transfer Station issued on February 4, 2016. For the last several years, the City of Auburn has been actively engaged in the regional conversations and studies concerning the potential construction of a new recycling and solid waste transfer station in South King County. As noted in the City's November 23, 2015 Scoping Comments for Revised Determination of Significance and Request for Comments on Scope of Environmental Impact Statement for South King County Recycling and Solid Waste Transfer Station, the City of Auburn is OPPOSED to the siting and development of a recycling and solid waste transfer station at 901 C Street SW (Parcel No. 2421049054), Auburn, WA 98001. This property is referred to as Alternative 1 in the DEIS. Further, for the reasons stated herein, the City of Auburn believes that Alternative 1 SHOULD NOT be the preferred alternative for the South County Recycling and Solid Waste Transfer Station. Irrespective of the County's final determination of a preferred siting alternative, the City of Auburn will continue to fully participate in the Environmental Impact Statement (EIS) process and other affiliated processes in order to preserve its legal rights and insure that an adequate level of detailed and correct analyses are conducted. Further, the City shall reserve its right to pursue all appeal opportunities throughout the entire environmental review process and other decision-making considerations in the event the City feels that all environmental, land use and other issues are not fully evaluated and mitigated.	Comment acknowledged.
A-201 (Auburn)	Section 1.4: Required Permits and Approvals Land Use	Table 1-2 does not specifically identify that the proposed development of a recycling and solid waste transfer station in the City of Auburn is subject to compliance with the City's adopted Essential Public Facilities standards as specified in Volume 3 - Capital Facilities Element, Public Buildings, Essential Public Facilities, of the most currently adopted Comprehensive Plan for the City of Auburn (Ordinance No. 6584, December 14, 2015). Table 1-2 specifies that a conditional use permit will be required. However, pursuant to the currently adopted Auburn Comprehensive Plan, Volume 3 - Capital Facilities Element, Public Buildings, Essential Public Facilities, CF- 69.3, essential public facilities of a regional, countywide, statewide or national nature will be reviewed by the City through the special area plan process that will be managed by the City of Auburn. The City of Auburn has determined that the South County Recycling and Solid Waste Transfer Station proposed in the City of Auburn and identified as Alternative 1 in the DEIS is an essential public facility of a countywide nature, and therefore, shall be subject to the special area plan process specified in the currently adopted Auburn Comprehensive Plan. The City of Auburn requests that the Final Environmental Impact Statement (FEIS) substantively address the City's standards and requirements for Alternative 1 as an essential public facility.	Table 1-2 in Section 1.4 is updated to list specific approval requirements.
A-202 (Auburn)	Section 2.1.2: Alternative 1	This Section does not identify that the City of Auburn's existing Maintenance and Operations Facility is located immediately south of the Alternative 1 site. The City's Maintenance and Operations Facility provides essential public services (i.e. streets operations, stormwater	Discussion of the Alternative 1 site and existing City of Auburn's Maintenance and Operations Facility are added to the FEIS

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		operations, sewer operations, water operations, fleet maintenance, central stores and inventory) throughout the City of Auburn, supports more than 75 City staff, is the primary storage area for 133 fleet vehicles and pieces of equipment, two (2) Hyde Shuttle vans and 31 fleet vehicles and pieces of equipment for the City's Parks, Arts and Recreation Department and is the fueling depot location for all City owned and operated vehicles. This Facility represents a multi-million dollar investment of public tax dollars. Currently, the only full movement vehicular access into and out of the City's Maintenance and Operations Facility is via an executed easement with Segale Properties through the eastern perimeter of the Alternative 1 site onto 3th Street SW. City vehicles and equipment distribute throughout the City primarily through the current signalized intersection at 3th Street SW and C Street SW. The DEIS fails to substantively analyze this essential access and traffic circulation situation for City services and does not provide any recommended mitigation measures to address the City's need for perpetual convenient full movement access for the City's Maintenance and Operations Facility. The City of Auburn requests that the FEIS contain this required traffic circulation and access analysis and that there be appropriate mitigation measures identified in the FEIS. Further, the City of Auburn requests that it be directly involved in and consulted in the scoping and preparation of this analysis and the development of the mitigation measures. Please note that because of the existing and close proximity signalized intersection at 15th Street SW and C Street SW and the City's intersection spacing standards, there are limited opportunities for the addition of full movement accesses for the direct benefit of the City's Maintenance and Operations Facility.	in Sections 3.9 Land Use and 3.12 Transportation. Additional analysis and coordination with the city is completed. Additional analysis was conducted at the C St / angled road intersection (between 15th and 8th St) and the results incorporated into the FEIS.
A-203 (Auburn)	Section 2.2.1: Building Features Land Use Visual Quality	This Section specifies that the overall new height of the new station would be approximately 70 feet above the lowest level. The Alternative 1 site has a current zoning designation of Heavy Industrial (M-2) pursuant to the currently adopted Comprehensive Zoning Map and is regulated by Chapter 18.23 (Commercial and Industrial Zones) of the Auburn Municipal Code. Table 18.23.0408 (M-1, EP and M-2 Zone Development Standards) specifies that the maximum building height in the M-2 zoning designation is 45 feet. Footnote 2 for this Table specifies that buildings may exceed 45 feet if one foot of setback is provided from each property line (or required minimum setback) for each foot the building exceeds 45 feet. The City of Auburn requests that the FEIS address compliance to the City's maximum building height requirement for the M-2 zoning designation as there is a 25-foot difference between the proposed height of the new station and the maximum height standard of the M-2 zoning designation.	Section 3.10.1 describes the Auburn building height variance process. The exact height of the building and any potential setback requirements will be determined during design.
A-204 (Auburn)	Section 2.2.3.1: Times of Operation Common Elements of Operation Noise	This Subsection specifies that operating hours for the new transfer station are set by King County ordinance. The Subsection further specifies that it is assumed that the new station would operate 9.5 hours per day, opening no earlier than 6:00 a.m. on weekdays, not earlier than 8:00 a.m. on weekends, and closing no later than 6:00 p.m. on any day. In its discussion of hours of operation, the DEIS fails to acknowledge that there is an existing Best Western PLUS Pepper Tree hotel located immediately of the Alternative 1 site on the northern perimeter of the 3th Street SW public street right-of-way. The assumed hours of operation, particularly the potential 6:00 a.m. opening hour, could have significant negative operational impact on the quality and comfort of hotel guests that could lead to a negative economic impact on the hotel's business viability. The City of Auburn requests that the FEIS	Section 2.2.3.1 is updated to address local permitting requirements. Table 3.7-6 of the FEIS includes the Best Western (401 8th St SW) and other adjacent existing land use noise impact analysis. As stated in the FEIS, the City of Auburn essential public facility process will be followed.

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		analyze the negative impacts the proposed hours of operations would have on all surrounding land uses. The City of Auburn is the regulating local government within the municipal limits of the City of the City. The City is the decision-maker on land use issues including but not limited to hours of operation in accordance with relevant standards of the Auburn Municipal Code. Alternative 1 in the City of Auburn will be subject to the City's essential public facilities siting process. Hours of operation for Alternative 1 would ultimately be established through the essential public facilities siting process. Therefore, the City of Auburn requests that the FEIS recognize that the actual hours of operation may not be as assumed in the DEIS, but will be determined through the essential public facilities siting process that will be managed by the City of Auburn. Section 8.28.B.8.a of the Auburn Municipal Code contains standards pertaining to acceptable hours of construction. This Section specifies that Except as provided for in subsection (8)(8)(b) of this section, sounds originating from construction sites, including but not limited to sounds from construction equipment, power tools and hammering before 7:00 a.m. and after 10:00 p.m. on any day of the week except Sunday and before 9:00 a.m. and after 10:00 p.m. on Sundays. However, because Alternative 1 in the City of Auburn would be subject to the City's essential public facilities siting process, the actual allowable hours of construction for this Alternative would be determined through this process. The City of Auburn requests that the FEIS recognize and address hours of construction including an acknowledgment that hours of construction will be determined through the City's essential public facilities siting process.	Section 3.7.3.1 addresses permitted hours of construction activity.
A-205 (Auburn)	Table 2-2: Summary of Potential Environmental Impacts	The Air, Odor, Greenhouse Gases (GHGs), Water Resources and Hazardous Materials Environmental Elements of Table 2-2 do not address known Trichloroethene (TCE) contamination of groundwater for the Alternative 1 site. In its November 23, 2015 Scoping Comments for Revised Determination of Significance and Request for Comments on Scope of Environmental Impact Statement for South King County Recycling and Solid Waste Transfer Station, the City provided substantive information pertaining to this contamination. This previously specified information is provided again below: Area of Known Groundwater Contamination. The project site is located within the mapped TCE groundwater contamination plume associated with the Boeing Auburn Fabrication Facility. Groundwater monitoring data provided to the City from 2011 to 2015 by Boeing, the Department of Ecology, and the Washington State Health Department have identified Trichloroethene (TCE) concentrations in groundwater at this site that exceed Washington MTCA clean-up. Based on that data, it appears that the contamination plume is originating from a location south of the proposed project site, and moving northward across the site. The City of Auburn requests that the FEIS substantively evaluate ALL of the following issues pertaining to the known presence of TCE related groundwater contamination: • Disturbance of soils and groundwater on the site needs to comply with MTCA remediation regulations?	The Hazardous Materials section of the Summary Table addresses TCE contamination in groundwater. Section 3.8.4.2 of the FEIS addresses mitigation related to the TCE-contaminated groundwater. A Health and Safety Plan would describe emergency procedures to protect workers and the general public. A contaminated media contingency plan for soil and groundwater would address appropriate disposal methods and facilities. Clarification is incorporated into Sections 3.1 Earth, 3.2 Air, Odor and Greenhouse Gases, 3.3 Water Resources and 3.8 Hazardous Materials.

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		• How will construction dewatering and stormwater runoff during construction be conducted to ensure construction workers and general public is not exposed to TCE and its breakdown products, and the contamination is not spread? • Where will any contaminated soils and groundwater removed from the site be disposed of? • If site remediation were part of the project, how would project address continuing on-migration to the site from the TCE source to the south? • What is the potential for health effects to customers and employees from ingestion, vapor, and dermal exposure? • Development of the site needs to include construction monitoring and long-term monitoring for presence and migration of TCE.	
A-206 (Auburn)	Table 2-2: Summary of Potential Environmental Impacts	The Land Use Environmental Element of Table 2-2 specifies that there will be minor and short-term impacts on adjacent land uses during construction of the Alternative 1 site and no impacts during operations. The City strongly objects to these conclusions. There are existing commercial and industrial businesses immediately surrounding the Alternative 1 site that will be significantly impacted by construction of Alternative 1 and may be permanently and negatively impacted the operation of the Alternative 1 site. Further, in addition to these immediately surrounding commercial and industrial businesses, the Outlet Collection of Auburn is located to the west of the Alternative 1 site. The Outlet Collection annually draws over 9 million visitors and is a major sales tax and property tax contributor to King County and the City of Auburn. The management of the Outlet Collection has previously expressed to the City and to King County its significant concerns about the on-going economic impacts and consequences to its business operation if the Alternative 1 site is developed for the new station. WAC 197-11-448 (4) provides agencies with the authority to include additional analyses in EISs. 901 C Street SW is currently zoned Heavy Industrial (M-2). Section 18.23.020.1 of the Auburn City Code specifies that the intent of this zoning designation is as follows: • *M-2, Heavy Industrial Zone. The M-2 zone is intended to accommodate abroad range of manufacturing and industrial uses. Permitted activity may vary from medium to higher intensity uses that involve the manufacture, fabrication, assembly, or processing of raw and/or finished materials. Heavy industrial uses should not be located near residential development.* The City of Auburn's most recent Building Lands Analysis as contained in the 2014 King County Buildable Lands Report identified 11. 15 employees per gross acre for industrial zoned properties. The proposing siting and development of the South King County recycling and solid waste transfer station at 901 C Street SW would reduce the City's job creation capacity and result in the loss of a minimum of 223 manufacturing related jobs. Because the City of Auburn is targeting family wage/manufacturing· employment businesses, this would be a significant loss of job producing capacity in the City. Therefore, the City of Auburn requests that a substantive	See Response A-9.

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		economic impact analysis addressing impacts to the City of Auburn in the areas of site specific economic development, area wide (minimum 5 mile impact area as measured out from the site on all sides) economic development, marketplace perceptions and challenges and general and specific fiscal impacts to the City of Auburn should be analyzed. This analysis shall be conducted by a qualified professional consultant with demonstrated experience whose selection should be conducted in coordination and consultation with the City of Auburn and other affected communities. Further, the City shall be involved in the development of the consultant's scope of work. The City of Auburn requests that a cost benefit analysis as specified and authorized under WAC 197-11-450 be conducted to aid in substantively evaluating the environmental consequences of the proposed solid waste transfer and recycling station to the Auburn community. This cost-benefit analysis should address the quantitative and qualitative impacts to the short-term and long-term operations of the existing surrounding commercial and industrial businesses including the Outlet Collection of Auburn. Similar to its expectations for the aforementioned economic impact analysis, the City insists that the cost benefit analysis be conducted by a qualified professional consultant and that the City be involved in developing the consultant's scope of work.	
A-207 (Auburn)	Table 2-2: Summary of Potential Environmental Impacts	The City of Auburn operates the Auburn Municipal Airport that is located approximately 2.75 miles northeast of the Alternative 1 site. FAA Advisory Circular (AC) 150/5200-338, August 28, 2007 contains regulatory guidance and standards for hazardous wildlife attractants on or near airports. Section 2-2.d contains standards for enclosed trash transfer stations that reads: • **Enclosed trash transfer stations**. Enclosed waste-handling facilities that receive garbage behind closed doors; process it via compaction, incineration, or similar manner; and remove all residue by enclosed vehicles generally are compatible with safe airport operations, provided they are not located on airport property or within the Runway Protection Zone (RPZ). These facilities should not handle or store putrescible waste outside or in a partially enclosed structure accessible to hazardous wildlife. Trash transfer facilities that are open on one or more sides; that store uncovered quantities of municipal solid waste outside, even if only for a short time; that use semi-trailers that leak or have trash clinging to the outside; or that do not control odors by ventilation and filtration systems (odor masking is not acceptable) do not meet the FAA's definition of fully enclosed trash transfer stations. The FAA considers these facilities incompatible with safe airport operations if they are located closer than the separation distances specified in Sections 1-2 through 1-4. The DEIS does not provide any substantive analysis of compliance with FAA Advisory Circular (AC) 150/5200-338 inclusive of any needed mitigation measures. The City of Auburn requests that the FEIS contain detailed and substantive analysis of compliance to this Advisory Circular and specify all needed mitigation measures that will be taken to address full compliance such	The FEIS discusses compliance with compliance with FAA Advisory Circular (AC) 150/5200-338 for Alternatives 1 and 2.

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		that there will be no direct or indirect safety issues for the operation of the Auburn Municipal Airport.	
A-208 (Auburn)	Table 2-3: Summary of Potential Mitigation Measures - Hazardous Materials	The Hazardous Materials Environmental Element does not specify any necessary mitigation measures for with known TCE contamination of groundwater on the Alternative 1 site.	The Summary Table is updated to address mitigation measures for TCE contamination in groundwater.
A-209 (Auburn)	Table 2-3: Summary of Potential Mitigation Measures - Earth	The Earth Element of Table 2-3 does not address that the City of Auburn's Low Impact Development (LID) requirements (required effective date of January 1, 2017) will be in effect before this project is designed and constructed. Alternative 1's Construction Stormwater Pollution Prevention Plan will be required to comply with the requirements of Auburn's Stormwater Management Manual, latest edition, including LID best management practices.	The Earth element is revised in the Summary Table and Section 3.1.
A-210 (Auburn)	Table 2-3: Summary of Potential Mitigation Measures - Water Resources	The Water Resources Element of Table 2-3 does not address that the stormwater management system for Alternative 1 will be required to comply with the requirements of Auburn's Stormwater Management Manual, latest edition, including LID best management practices.	The Water Resources element is revised in the Summary Table and Section 3.3.
A-211 (Auburn)	Section 3.2: Air. Odor and Greenhouse Gases	Subsection 3.2.2.2 should address that the Alternative 1 site is located in the portion of Auburn that has been designated by the Puget Sound Clean Air Agency as a Highly Impacted Community with regards to air quality.	Section 3.2.1 and 3.2.2 are updated to acknowledge Algona and Auburn Highly Impacted Communities in the project area.
A-212 (Auburn)	Section 3.2: Air. Odor and Greenhouse Gases	Subsection 3.2.3.1 should address Alternative 1 should address potential environmental impacts to air quality associated with TCE groundwater contamination of the Alternative 1 site.	The potential air quality effects of the TCE plume is addressed in Section 3.2.3.
A-213 (Auburn)	Section 3.2: Air. Odor and Greenhouse Gases	Subsection 3.2.3.2 Alternative 1 should include an evaluation of Puget Sound Clean Air Agency's designation of a portion of Auburn as a Highly Impacted Community in regards to existing versus new sources of pollution when addressing cumulative impacts to air quality.	Auburn's and Algona's designations as Highly Impacted Communities are addressed in Section 3.2.
A-214 (Auburn)	Section 3.3: Water Resources	Subsection 3.3.2.2 mentions the TCE groundwater contamination on the Alternative 1 site, however, this contamination is not substantively addressed in Subsection 3.3.3.1 pertaining to the Alternative 1 site.	The potential water resources effects of the TCE plume are addressed in Section 3.3.3.
A-215 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.2.2 for the Alternative 1 site, Subsection Auburn Municipal Code (ACC) 16.10.100 D.4 and D. 7 of the Auburn Municipal Code prohibit hazardous waste treatment, storage and disposal or recycling facilities that accept, store or use hazardous	Mitigation Plan requirements have been added to Section 3.3.4.2.

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		materials in Groundwater Protection Zone 3. Mitigation plan requirements are addressed in ACC 16.10.120 E.	
A-216 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.2.2 for the Alternative 1 site, the reference to the City of Auburn Comprehensive Drainage Plan (Brown and Caldwell 2011) is out of date. The correct reference is City of Auburn Comprehensive Storm Drainage Plan (Brown and Caldwell 2015) adopted by the Auburn City Council on December 14, 2015 (Ordinance No. 6584).	The reference is updated in Section 3.3.
A-217 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.3.1 for construction related groundwater impacts for the Alternative 1 site, Subsections 16.10. 100 D.4 and D. 7 of the Auburn Municipal Code prohibit hazardous waste treatment, storage and disposal or recycling facilities that accept, store or use hazardous materials in Groundwater Protection Zone 3. Mitigation plan requirements are addressed in Subsection 16.10.120 E of the Auburn Municipal Code.	The code requirement is described in Section 3.8.4.2.
A-218 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.3.1 for construction related stormwater and water quality impacts -Auburn's current adopted Surface Water Management Manual is 2009 not 2014 as specified. Please note that any construction of the Alternative 1 site will be required to comply with the latest edition of Auburn's Surface Water Management Manual, which will include Low Impact Development (LID) effective January 1, 2017.	The reference is revised in Section 3.3.
A-219 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.4.2 for the design of the Alternative 1 site, said design should address compliance to latest edition of Auburn's Surface Water Management Manual, which will include Low Impact Development (LID) effective January 1, 2017.	See response A-218.
A-220 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.4.2 for the construction and operation of the Alternative 1 site, the City of Auburn will need to approve an exception, not just a mitigation plan, for the presence of Hazardous within the boundaries of Groundwater Protection Zone 3.	This language is revised in Section 3.3.
A-221 (Auburn)	Section 3.3: Water Resources	Pertaining to Subsection 3.3.4.2 for the construction and operation of the Alternative 1 site, the City of Auburn's currently adopted Surface Water Management Manual is the 2009 edition and not the 2014 edition as stated.	See response A-218.
A-222 (Auburn)	Section 3.4: Vegetation and Wetlands	Subsection 3.4.3.1 pertaining to the construction of wetlands on the Alternative 1 involving disturbance to the existing wetland or wetland buffer will require prior review and authorization from the City of Auburn in accordance with Chapter 16.10 (Critical Areas of the Auburn Municipal Code. It should also be noted that disturbance may require review and approval by the Washington Department of Ecology and the Army Corps of Engineers.	Section 3.4.1 describes the Corps of Engineers, Ecology, and local jurisdiction and regulatory oversight over wetlands under the Clean Water Act.
A-223 (Auburn)	Section 3.4: Vegetation and Wetlands	Subsection 3.4.3.1 incorrectly references the 2014 edition of the City of Auburn's current Surface Water Management Manual. The most currently adopted edition is 2009.	See response A-218.
A-224 (Auburn)	Section 3.4: Vegetation and Wetlands	Subsection 3.4.4.2 pertaining to the potential use of buffer width averaging will require City of Auburn review and approval pursuant to Chapter 16.10 (Critical Areas) of the Auburn Municipal Code and should not be assumed.	Comment Acknowledged.
A-225 (Auburn)	Section 3.8: Hazardous Materials	Subsection 3.8.4.2 should include mitigation measures that address potential impacts from the TCE contamination plume to groundwater as it is associated with Groundwater Protection Zone 3. At a minimum, an additional mitigation measure should be provided that specifies that a calculation of the dewatering flow and potential radius of influence (i.e., zone of contribution)	The SCRTS Operating Plan would address TCE monitoring and public health and safety as appropriate. Additionally, as stated in Section 3.3.3, a Health and Safety Plan, a contaminated media

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		to the area being dewatered needs will be completed for the FEIS to evaluate potential adverse migration of the TCE plume towards the Alternative 1 site.	contingency plan, and other measures would be implemented prior to construction to minimize the potential for TCE to enter surface waters.
A-226 (Auburn)	Section 3.9: Land Use Noise	Pertaining to Subsection 3.9.3.1, the analysis of direct land use environmental impacts from Alternative 1 states: • "Construction is anticipated to last approximately 24 months. Permits for construction would be required from the City of Auburn. Short-term impacts to adjacent land uses could occur due to construction activities resulting in minor, localized increases in noise, dust, odors, traffic and emissions." This Subsection does not identify the actual hours of the proposed construction to allow reviewers to evaluate and provide comments on the potential for these listed temporary impacts. In an earlier portion of the DEIS the analysis acknowledges that the City has established regulations regarding construction hours to control and limit sounds originating from construction sites, including but not limited to sounds from construction equipment (including back up alarms), power tools and hammering. Pursuant to Subsection 8.28.010 (Noise Control) of the Auburn Municipal Code, construction hours are limited to before 7:00 a.m. and after 10:00 p.m. on any day of the week except Sunday and before 9:00 a.m. and after 10:00 p.m. on Sundays. As acknowledged in an earlier section of the DEIS in describing nearby land uses the Alternative 1 site is within approximately 300 feet of noise sensitive land uses comprise of the Best Western Plus Peppertree Inn (Parcel No 1321049113) and within 670 feet of the closest existing single family residence (Parcel No. 132104-9063, 1321049042, 1321049041 and 3121049059). The two-year construction duration represents more than a "minor impact" on these adjacent noise-sensitive uses. The effect of noise impacts on the hotel could also result in economic impacts due to customer complaints and lost bookings. The effect of construction activities and their duration on economic hardship of businesses has become of increased prominence recently due to the experience of the City of Seattle's road reconstruction construction project for 23rd Avenue E. The City of Auburn requests that the FEIS provide substantive analysis of construction related noise impacts as described above and identify the appropriate mitigation measures that would be implemented to reduce the aforementioned negative economic impacts.	See Response A-105. Construction hours are included in the impacts discussions in Section 3.9.3.1. Section 3.7.3.1 is revised to include additional information regarding potential construction noise levels and impacts. Section 3.7.3.1 also includes information regarding permitted construction hours and allowed noise levels for various construction activities. Construction would comply with restrictions on construction hours and allowed noise levels under all alternatives in accordance with applicable noise regulations. Regarding potential economic impacts, please refer to response A-9.
A-227 (Auburn)	Section 3.9: Land Use Noise	Pertaining to Subsection 3.9.3.1, the analysis of direct land use environmental impacts from Alternative 1 states: • "Operating hours are set by county ordinance. It is assumed that the new transfer station would Operate 9.5 hours per day, not opening earlier than 6 a.m. on weekdays and not earlier than 8 a.m. on weekends, and closing no later than 6 p.m. on any day. Staffing would depend on the day of the week, season of the year, and services provided. The assumption is that employees based at the transfer station on any given	See response A-204.

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		day (e.g., scale operators, transfer station operators, and on-site supervision) would range from 6 to 15 with truck drivers, maintenance, and other staff as needed." "No operational land use impacts are anticipated." As identified in the preceding comment, the proposed hours of operation are proposed to occur one hour earlier on weekdays and one hour earlier on weekends than the City's current regulations for the generation of noise that might be allowed on a temporary basis. Also, as noted in the proceeding section, the Alternative 1 site is within approximately 300 feet of noise sensitive land uses including a hotel (Best Western Plus Peppertree Inn) and within 670 feet of four single family residences. As a result, the proposed transfer station's starting operating hour of 6:00 a.m. will result in operational impacts to nearby noise sensitive uses that are not identified or mitigated in the DEIS. The City of Auburn requests that the FEIS analyze the proposed hours of operation based on the proximity to noise sensitive land uses and identify appropriate mitigation measures, including but not limited to, an identified later starting time for the facility.	
A-228 (Auburn)	Section 3.9: Land Use Noise	Pertaining to Subsection 3.9.3.1 and more specifically on Page 3-153 of the DEIS, the DEIS addresses compatibility with Existing Land Use for Alternative 1 and states: "There are no residences adjacent to the Alternative 1 site." While it is accurate that there are no residences immediately adjacent to the Alternative 1 site, there are noise sensitive uses nearby. The Site is within approximately 300 feet of noise sensitive land uses including the Best Western Plus Peppertree Inn (Parcel No 1321049113) and within 670 feet of four single family residences (Parcel No. 132104-9063, 1321049042, 1321049041 and 3121049059). These properties are commercially zoned by the City of Auburn. The DEIS analysis appears to understate project impacts on these residentially oriented land uses. The City of Auburn requests that the FEIS substantively analyze compatibility with the current uses of these aforementioned properties and identify appropriate mitigation measures to reduce negative computability issues for these properties resulting from the construction and operation of the recycling and transfer station on the Alternative 1 site.	Construction of the project would comply with maximum permissible noise levels allowed under the King County Noise Ordinance. The noise analysis concludes that operational noise from the project would be below the maximum permissible noise levels allowed under the King County Noise Ordinance for adjacent and nearby land uses, including these residential properties adjacent to SR 18. Based on this, the proposed use is compatible with the surrounding land uses.
A-229 (Auburn)	Section 3.9: Land Use Noise	Pertaining to Subsection 3.9.3.1 and more specifically on Page 3-153 of the DEIS, the DEIS addresses compatibility with Existing Land Use for Alternative 1 and states: "The site is large enough to provide a buffer zone that could include shrubs, trees and walls or fencing between the transfer station and surrounding uses on all four sides of the site". The DEIS does not contain a conceptual or detailed site plan for the Alternative 1 site such that the City of Auburn could substantively evaluate the validity of this conclusive statement pertaining to the effective of these potential buffer methods for noise attenuation. The City of Auburn request that the FEIS should include a detailed site plan with associated analysis that validates this conclusive statement or the statement should be removed and its removal identified in the FEIS.	Detailed site plans will be developed at the start of design during land use permitting. Figure 2-3 shows the approximate building footprint relative to the size of the site, demonstrating that there is sufficient room for buffers. Section 3.7 addresses potential noise impacts.
A-230 (Auburn)	Section 3.9: Land Use	Beginning on Page 3-153 of the DEIS, in the discussion of direct environmental impacts from Alternative 1, the DEIS addresses consistency with City of Auburn Zoning Code. Specifically, the DEIS discusses the project's consistency with the criteria for consideration of approval of a	Compliance with standards and requirements for siting an essential public

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		Conditional Use Permit (CUP). However a Conditional Use Permit is not the appropriate process. The City of Auburn requests that the FEIS clarify that a Conditional Use Permit is not the approval land use approval process and further clarify that the siting of essential public facilities is subject to the city's special area plan process which is required to be processed as a legislative amendment to the adopted City of Auburn Comprehensive Plan.	facility in the City of Auburn are described in the updated Section 3.9.3.1.
A-231 (Auburn)	Section 3.9: Land Use	Beginning on Page 3-156 of the DEIS pertaining to the evaluation of Alternative 1's consistency with the City of Auburn Comprehensive Plan, the DEIS addresses consistency with the City's essential public facility siting process. Specifically, any essential public facility to be located within the City is required to follow the special area plan process (Comprehensive Plan Amendment) pursuant to Comprehensive Plan Policy CF-70. The DEIS addresses consistency with that portion of the criteria required for all essential public facilities. Other criteria are also relevant. The City's criteria (Comprehensive Plan Policy CF- 69) for all essential public facilities is recited (indicated in italics) and a response within the DEIS analysis is provided to each criterion in the DEIS. • *Item b. The impact of the facility on the surrounding uses and environment, the City and the region.* o While a goal in the siting of a location of a transfer station is to be convenient to waste generation sources (service area), the City of Auburn believes that a recycling and transfer station is more appropriately located in an area of homogenous heavy industrial zoning and development; rather than the mix of uses that exists in proximity to the Alternative 1 site. The Alternative 1 site is located within an area developed with a diversity of land uses. Approximately 375 feet to the west and separated by the Interurban Trail (transportation and recreational) and the Union Pacific Railroad line are the Regal Cinemas movie theater, a Walmart retail store, the Outlet Collection-Seattle Regional Shopping Center and other commercial retail land uses. The surrounding contains existing single-family residential uses, a hotel, two restaurants and several small-scale commercial businesses (Page 3-145). It should be noted that only some of the land uses to the south of the proposed Alternative 1 site are appropriate heavy industrial zoned and developed properties. o On Page 3-154, the DEIS states: "The transfer building would be enclosed to minimize migration of odors and dust from the building." It further states: "Closed, end-loaded containers will be used for solid waste, reducing the potential for spillage of waste and litter about the site." o The DEIS concludes dust and odors and spillage of waste and litter can be minimized but not completely controlled and confined to the site. The City of Auburn believes that the large openings in the building that are continuously open during operations will result in dust and odors and spillage of waste and wind carried litter that will adversely affect adjacent residential, commercial and public recreation uses.	Section 3.9.3.1 is revised to discuss Alternative 1's consistency with the City of Auburn Comprehensive Plan, including CF-69 Essential Public Facilities of a regional nature.

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		o The DEIS response to this criterion only addresses relationship to suburban and regional context and not the particular surroundings of this site. This omission significantly underestimates and undervalues the anticipated negative impacts to the diverse surrounding land uses. Further, unlike other heavy industrial development, the recycling and transfer station proposed for the Alternative 1 site is characterized by a steady stream of vehicle traffic especially on Saturdays, which is not characteristic of most other heavy industrial uses. o Based on the preceding, the City of Auburn requests that the FEIS more substantively address overall compliance with this criterion taking into account the issues and concerns stated herein.	
A-232 (Auburn)	Section 3.9: Land Use	Beginning on Page 3-156 of the DEIS pertaining to the evaluation of Alternative 1's consistency with the City of Auburn Comprehensive Plan, the DEIS addresses consistency with the City's essential public facility siting process. Specifically, any essential public facility to be located within the City is required to follow the special area plan process (Comprehensive Plan Amendment) pursuant to Comprehensive Plan Policy CF-70. The DEIS addresses consistency with that portion of the criteria required for all essential public facilities. Other criteria are also relevant. The City's criteria (Comprehensive Plan Policy CF- 69) for all essential public facilities is recited (indicated in italics) and a response within the DEIS analysis is provided to each criterion in the DEIS. • *Item c. Whether the design of the facility or the operation of the facility can be conditioned, or the impacts mitigated, in a similar manner as with a traditional private development, to make the facility compatible with the affected area and the environment.* *Item d. Whether a package of mitigating measures can be developed that would make siting the facility within the community more acceptable.* o The DEIS response to Criteria Items c and d describes design features and mitigation measures that are not supported by a conceptual or detailed site plan. As noted throughout its comments on the DEIS, the City of Auburn believes that a recycling and transfer station at the Alternative 1 site will have substantive negative impacts, including but not limited to traffic flow and control, access to and circulation within the property and off-street parking that can only be effectively evaluated through detailed evaluation and analysis of site, building and engineering plans. Further the effect on loading, refuse and service area, utilities, screening and buffering, signs, yards and other open spaces cannot be adequately evaluated as the development arrangement is not identified; rather the DEIS makes assumptions that cannot be validated or refuted because of the lack of detailed plans.	See Response A-231. Additionally, see Response T-1.

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		o On page 3-155, the DEIS describes that closed, end loaded containers would be used for transfer of solid waste, to reduce risk of spillage. This portion of the DEIS also states that: "Noisy activities would mostly be done within the enclosed transfer building." [emphasis added]. This portion of the DEIS further states that waste would be removed or placed within a closed container at the end of the day, receiving floors would be washed daily and perimeter landscaping and fencing would be installed to trap litter. o Consistent with SEPA guidance, the DEIS describes measures to reduce impacts. However, the level of traffic, the noise generation and odor generation that will result from construction and operation of the Alternative 1 site will contribute adversely to the health, welfare and general well-being of the environment, public and individuals, particularly surrounding the subject site. The DEIS acknowledges that traffic, noise, odor and debris impacts will be worse as a result of the construction and operation of the Alternative 1 site. The DEIS does not identify if the proposed mitigation measures will be effective at reducing these impacts to a level of insignificance. o The City of Auburn believes that an unintended consequence of recycling and solid waste transfer stations is increased illegal dumping in proximity to the stations. While the exact reason cannot be known, it appears that due to expense of fees or hauling outside operating hours, vehicle loads intended for the transfer station can end up illegally dumped on nearby properties or on public rights-of-way. The City of Auburn believes that the likely increase in occurrence of illegal dumping activities would qualify as a nuisance that would require frequent response by the City of Auburn that has not been addressed in the DEIS. o Based on the preceding, the City of Auburn requests that the FEIS more substantively address overall compliance with this criterion taking into account the issues and concerns stated herein.	
A-233 (Auburn)	Section 3.9: Land Use	Beginning on Page 3-156 of the DEIS pertaining to the evaluation of Alternative 1's consistency with the City of Auburn Comprehensive Plan, the DEIS addresses consistency with the City's essential public facility siting process. Specifically, any essential public facility to be located within the City is required to follow the special area plan process (Comprehensive Plan Amendment) pursuant to Comprehensive Plan Policy CF-70. The DEIS addresses consistency with that portion of the criteria required for all essential public facilities. Other criteria are also relevant. The City's criteria (Comprehensive Plan Policy CF- 69) for all essential public facilities is recited (indicated in italics) and a response within the DEIS analysis is provided to each criterion in the DEIS. • *Item f. Whether the proposed essential public facility is consistent with the Auburn Comprehensive Plan.*	See Response A-231. Additionally, see Response T-1.

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		o The DEIS responses to this criterion conclude that since the City's Comprehensive Plan allows a process for siting an essential public facility as required by state law, that is consistent with the city's Comprehensive Plan. The DEIS omits a comparison of the project to the specific objectives and policies of the City's Comprehensive Plan as required by this criterion and that would, at a minimum, be needed for the required public analysis and consideration for the City's essential public facilities siting process. o As identified earlier in the DEIS at Page 3-143, the Alternative 1 site is zoned M2, Heavy Industrial by the City, but is immediately adjacent to other less intensive zoning designations on three sides. The DEIS does not adequately evaluate the potential effect on developed properties in the adjacent land use designations as required. The information within the DEIS describes how the project will meet development standards of the M2, Heavy industrial zone. The DEIS does not analyze how the transfer station construction and operation would not have a greater effect on the health and safety or no more injurious, economically or otherwise, to property or improvements in the surrounding area than would any use generally permitted in the M2 district, as required. The recycling and solid waste station proposed for development at the Alternative 1 site would more appropriately be sited in an area of homogenous heavy industrial zoning; rather than surrounded on three sides by different zones and a mix of uses at the site of Alternative 1. o As noted throughout its comments on the DEIS, the City of Auburn believes that a recycling and transfer station at the Alternative 1 site will have substantive negative impacts, including but not limited to traffic flow and control, access to and circulation within the property and off-street parking that can only be effectively evaluated through detailed evaluation and analysis of site, building and engineering plans. Further the effect on loading, refuse and service area, utilities, screening and buffering, signs, yards and other open spaces cannot be adequately evaluated as the development arrangement is not identified; rather the DEIS makes assumptions that cannot be validated or refuted because of the lack of detailed plans. o Please note that the Alternative 1 site is located within the designated boundaries of the Auburn Innovation Partnership Zone (IPZ). The City of Auburn received an IPZ designation from the Washington State Department of Commerce and this designation has been incorporated into the City of Auburn Comprehensive Plan. Auburn's IPZ is one of 15 approved IPZs in the State of Washington and is one of only 4 cities in the state to receive the designation. The Auburn IPZ map can be located at the following URL: http://www.auburnwa.gov/Assets/Administration/AuburnWNDocs/ipz_map.pdf?method=1. This map clearly shows that the Alternative 1 site is located within the designated boundaries of the IPZ.	

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		o The mission of Auburn's Urban Center for Innovative Partnerships is to support a vibrant vital economy for the City of Auburn, the local region and the State of Washington. Encouraging the adaption of warehouse districts to mixed use, market-affordable technology clusters and facilitating collaborative partnering among private sector employers, research partners, and programmed workforce development, the IPZ will implement a multi-phased plan across a variety of business sectors beginning with Ecosystems and Rainwater Management. These collaborative clusters will realize new businesses and products; expand the City's existing knowledge based middle-wage jobs while creating new higher paying employment opportunities for the citizens of the City. Through new partnerships and the clustering of entrepreneurs, ideas will flourish, manufacturing efficiencies will be developed and the City's diverse business community will expand, creating investment opportunities, new technologies and the general growth of the City's economy. o Based on the preceding, the City of Auburn requests that the FEIS more substantively address overall compliance with this criterion taking into account the issues and concerns stated herein.	
A-234 (Auburn)	Section 3.10: Visual Quality	The DEIS concludes that there would be non-substantial changes in visual quality from the construction and operation of the new transfer station for the majority of the analyzed viewpoints. The City of Auburn strongly disagrees with this conclusion. The presence of a solid waste recycling and transfer station would have substantive and negative visual quality impacts on surrounding existing land uses that could negatively impact business operations and deter future reinvestment and investment in commercial and industrial properties. In particular, the City is concerned about the visual quality impacts that the new transfer station could have on future redevelopment of the 130 acres GSA facilities south of the Alternative 1 site on the south side of 15th Street SW. The City of Auburn requests that the FEIS include substantive analysis of the visual quality impact on the future redevelopment of the GSA properties.	As described in Section 3.10.3.1, the site is currently vacant and undeveloped. The addition of a new landscaped and screened transfer station could provide a visual amenity above existing levels. It is acknowledged that changes in visual quality would likely occur at several viewpoints. The scoring of visual quality from identified viewpoints is described in Appendix D. The existing GSA facilities are considered as appropriate in the FEIS the extent of currently available information under cumulative impacts, where applicable, including Sections 3.9 Land Use and 3.10 Visual Quality.
A-235 (Auburn)	Section 3.10: Visual Quality	Figure 3.10-1 shows a conceptual design for the proposed Factoria Recycling and Transfer Station. Figure 3.10-2 shows a photograph of the existing Shoreline Recycling and Transfer Station. The difference in design considerations between these two facilities is substantive, particularly in terms of materials selection, building massing and articulation and architectural design features. The City of Auburn requests that the FEIS commit to a building design for the Alternative 1 site that is comparable to the conceptual design specified in Figure 3.10-1. Further, the City of Auburn requests that the FEIS contain a commitment from King County	As described in the FEIS, these figures are provided as examples of design features that would be considered for the SCRTS. The project will comply with local design requirements at all stages of design development.

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		Solid Waste Division to work directly with the City of Auburn in building design from conceptual to final designs.	
A-236 (Auburn)	Section 3.10: Visual Quality	Under the Assumptions portion of the DEIS on Page 3-166, it is stated that one of the assumptions used to evaluate visual quality is that a "building height of up to 70 feet above the lower level" is proposed. This description of height as "above the lower level" is not consistent with the City's current definition of building height specified in Section 18.04.200 of the Auburn Municipal Code and as such, it is unclear about what building height is proposed and what building height was studied in the visual quality assessment methodology. The City of Auburn requests that the FEIS clarify the building height relative to the City's current building height definition and further that it clarify if and how this affects the visual quality assessment methodology.	Section 3.10.3.1 of the FEIS states that the division may need to apply for a building height variance. The visual quality methodology states that the building height could be up to approximately 70 feet which was used in the analysis. The building footprint will encompass only about 10% of the Alternative 1 site (as shown in Figure 2-3) and it is anticipated the building will be a substantial distance from the property boundaries and/or required yard setbacks. That distance may allow for a substantial increase in allowable height per the Auburn code.
A-237 (Auburn)	Section 3.10: Visual Quality	Section 3.10.2.3 of the DEIS addresses the visual quality assessment methodology which is based on six viewpoints oriented to the site of Alternative 1 from different areas and different distances surrounding the Alternative 1 site. The viewpoints are not representative of views of the developed transfer station from the elevated highway of State Route (SR) 18 located north of the Alternative 1 site. The highway is elevated on fill and concrete piers extending approximately 34 feet above the site elevation approximately 850 feet to the north of the site. The views from SR-18 form a defining visual impression and visual character of the Auburn community. SR 18 is a major highway that is used for city visitors to travel to the Muckleshoot Casino and the Muckleshoot White River Amphitheater among other destinations. The City of Auburn is particularly concerned about the white roof color option described on Page 3-167 of the DEIS. This option would not be "visually neutral" and would tend to reflect sunlight and appear bright attracting visual attention to the facility especially if the roof was oriented towards this location and not partially obscured by parapet walls or other means. As described, the development of Alternative 1 would represent more than a "non-substantial" (Page 3-183) change in visual quality. Also, if rooftop equipment is proposed it should be designed such that it appears as an architectural feature and similar to the building with regard to color and texture and be non-glare. Finally, any rooftop equipment should be located and arranged to have the least visibility and protrusion that is functionally possible. The City of Auburn requests that the FEIS address in substantive detail the visual quality impacts from State Route 18 as well as the proposed white roof color and the placement and arrangement of rooftop equipment with regards to overall visibility from any direction.	As described in Section 3.10.2.1 viewpoints were selected to provide varying distances from the site at publically accessible locations. A viewpoint from SR 18 was not created due to health and safety concerns. It is anticipated that a transfer station would be compatible with existing surrounding land uses. Section 3.10.4.2 describes design mitigation that would minimize potential visual quality impacts. See Response A-235.
A-238 (Auburn)	Section 3.10: Visual Quality	Section 3.10.3.1 of the DEIS describes the direct visual quality impacts from operation of the Alternative 1 site and notes that a building height variance may be requested for the project in accordance with Section 18. 70.015 of the Auburn Municipal Code. The DEIS summarizes the criteria as follows:	See Response A-235. The need for a variance and the process to be followed will be determined during the design phase of the project.

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		• " ... which is authorized from the following criteria: 'additional height shall be the minimal necessary to afford relief, that the variance will not alter the character of the neighborhood or be detrimental to the surrounding properties, and/or that the approval will be consistent with the purpose of this title and the zoning district in which it is located." While not specifically stated, Section 18.70.015 of the Auburn Municipal Code pertains to an administrative variance for building height up to fifty (50) percent of the standard may be pursued when the request meets the applicable zoning code criteria. In authorization of an administrative variance, the Director may attach such conditions regarding the location, character and other features of the proposed structure or use as he/she may deem necessary to carry out the intent and purpose of this title and in the public interest. A variance greater than fifty (50) percent is subject to a public hearing and decision-making by the City of Auburn Hearing Examiner. The City of Auburn requests that the FEIS substantively address whether the stated building variance request will be an administrative variance or a public hearing variance and, in either scenario, how compliance to the applicable criteria will be achieved.	
A-239 (Auburn)	Section 3.10: Visual Quality	Section 3.10.3.1 of the DEIS provides representative views of the Alternative 1 site with an outline (red line) added atop the photograph to illustrate the bulk of proposed site development. One particular view, Viewpoint 1-B, shows that the proposed transfer station would be highly visible from the Interurban Trail and occupy a substantial portion horizontally and vertically of the mid-ground field of view. The City has consistently assigned importance to the quality of views from the Interurban trail as evidenced by the City's current zoning code requirement for the provision of landscape buffering to the Interurban Trail by adjacent development (refer to Section 18.50.040, Landscape Development Standards of the Auburn Municipal Code). As illustrated, the development of Alternative 1 will represent more than a "non-substantial" change in visual quality. The City of Auburn requests that additional substantive mitigation measures be specified in the FEIS for the provision of a significant on-site landscape screen between the Interurban Trail and the Alternative 1 site.	It is anticipated that the vegetation associated with the wetland and added vegetative buffers would reduce visual impacts from the Interurban Trail. Section 3.10.3.1 is updated to include coordination with the city regarding landscape design.
A-240 (Auburn)	Section 3.12: Transportatio n	Pertaining to Subsection 3.12.1. 1, the City of Auburn completed and adopted an update lo its Comprehensive Transportation Plan on December 14, 2015. The updated Plan includes forecast traffic volumes for 2022 and 2035. The forecasts are from the City of Auburn travel demand model which is based on the Puget Sound Regional Council (PSRC) regional model, but includes numerous modifications to better reflect the local street system, capacity projects, and future growth. The FEIS should at a minimum, include a comparison between these two sets of forecasts, and if significant differences are discovered reflect the City forecasts.	The 2020 and 2040 forecasts included in the 2015 City of Auburn's Comprehensive Transportation Plan were reviewed and the volumes were adjusted accordingly in the FEIS. Additionally, a discussion is added to section 3.12.1.1 .
A-241 (Auburn)	Section 3.12: Transportatio n	Pertaining to Subsection 3.12. 1.1, as part of the City of Auburn Comprehensive Transportaf1on Plan update, revisions were made to the corridors which are identified for Level of Service (LOS) analysis. In addition, changes were made to the LOS standards for certain corridors. The City of Auburn requests that the FEIS address these changes.	The 2020 and 2040 forecasts included in the 2015 City of Auburn's Comprehensive Transportation Plan were reviewed. A sensitivity analysis was conducted and the

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			results summarized in Appendix D Transportation Data and Figures
A-242 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3. 12. 1.2, Super mall Way was renamed Outlet Collection Drive in 2013. The City of Auburn requests that the FEIS recognize this official street name change.	The street name is updated in section 3.12.1.2.
A-243 (Auburn)	Section 3.12: Transportation	Pertaining to Figure 3. 12-1, the City of Auburn requests that the FEIS show intersection numbers and that the corridors be numbered to match City of Auburn designations.	Figure 3.12-1 is updated in section 3.12.1.4.
A-244 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3.12.1.4, the City of Auburn requests that FEIS address that the corridor level of service standards used in the DEIS have been updated as part of the updated City of Auburn Comprehensive Transportation Plan approved by the Auburn City Council on December 14, 2015.	The corridor LOS analysis is updated in the FIES to reflect the updated standards in the 2015 City of Auburn's Comprehensive Transportation Plan.
A-245 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3.12.2.2, the portion of this Subsection that addresses percentile adjustments to the trip generation for the existing site is confusing and appears to have no direct bearing on the analysis. The City of Auburn request that the FEIS clarify this information or remove it from the analysis. The corridor Level of Service (LOS) standards used in this Subsection are not consistent with currently adopted City standards. The City of Auburn requests that FEIS contain the most current standards that are consistent with the adopted City of Auburn Comprehensive Transportation Plan.	The percentile adjustment discussion in section 3.12.2 is updated to provide greater clarity. The corridor LOS standards are updated accordingly.
A-246 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3.12.2.4, the City of Auburn uses a Safety Priority Index System (SPIS) to evaluate and rank intersections based on safety. The City of Auburn requests that the FEIS analyze SPIS and the ranking assigned to study intersections located in the City.	A SPIS safety analysis has been conducted for the study intersections located within the City of Auburn and added to section 3.12.2.4.
A-247 (Auburn)	Section 3.12: Transportation	Pertaining to Table 3.12-9, the City of Auburn requests that the FEIS identify that the relevant jurisdiction for each facility be added to the Table.	Table 3.12-9 in the FEIS has been updated accordingly.
A-248 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3. 12.3. 1, the transportation improvement projects included in the DEIS analysis are not consistent with the assumptions used in the City of Auburn Comprehensive Transportation Plan. For example, West Valley Highway S (15th Street SW to SR-18) included in the 2040 analysis in the EIS is identified to be complete by 2022 in the City of Auburn Comprehensive Transportation Plan. A second example is the completion of the Stewart Road corridor between W Valley Highway and 140th Ave Ct E. While this is not in the immediate study area, completion of this project is anticipated to result in significant changes to travel patterns through the study area (W Valley Hwy, C Street and A Street). The City of Auburn requests that the FEIS update the improvement projects to be consistent with the City of Auburn Comprehensive Transportation Plan. The City of Auburn also requests that the FEIS contain an expanded analysis of additional improvement projects not included in the study area, but which have the potential to influence traffic volumes through the study area.	The planned improvements were reviewed and relevant information is updated in Section 3.12.3 per the current adopted comprehensive plan.
A-249 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3. 12.3. 1, the average delays at all study intersections has been truncated at 80 seconds, while the v/c ratios have been truncated at 1.2. This makes is difficult to determine the impacts of the project alternatives at study intersections, and whether	Section 3.12.3.1 in the FEIS is updated.

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		mitigation measures should be identified. The City of Auburn requests that the FEIS address this issue.	
A-250 (Auburn)	Section 3.12: Transportation	Pertaining to Subsection 3. 12.3.2, the City of Auburn Comprehensive Transportation Plan includes the following definition for unsatisfactory Level of Service (LOS): an unacceptable increase in hazard or unacceptable decrease in safety on a roadway; an accelerated deterioration of the street pavement condition or the proposed regular use of a street not designated as a truck route for truck movements that can reasonably result in accelerated deterioration of the. street pavement (typically addressed through the payment of the truck impact fee); an unacceptable impact on geometric design conditions at an intersection where two truck routes meet on the City arterial and collector network; an increase in congestion which constitutes an unacceptable adverse environmental impact under the State Environmental Policy Act; or the inability of a facility to meet the adopted LOS standard. The City of Auburn requests that the FEIS contain additional analysis to determine if Alternative 1 would trigger mitigation under these standards, especially at the s'" Street SW/C Street SW intersection from which the Alternative 1 site is intended to take access. While the LOS analysis presented in the DEIS does not show a LOS impact at this intersection, the lack of a northbound left-turn pocket combined with the increase in turning traffic at this intersection is anticipated to result in an impact to both traffic operations and safety. Necessary improvements at this intersection could include the construction of a northbound left-turn pocket, however adequate public right-of-way is not currently available to accommodate such an improvement. Due to the proximity to the Burlington Northern Santa Fe (BNSF) rail yard, all of the necessary widening would have to be accommodated on the west side of the street which would impact adjacent businesses and require the Puget Sound Energy (PSE) transmission lines to be relocated. The FEIS should also address impacts to pavement condition from the increase in truck traffic, and both traffic impact fees and truck impact fees which would be required with the selection of Alternative 1.	The Alternative 1 results have been reviewed based on the definition of unsatisfactory LOS and Section 3. 12.3.2 and updated accordingly. Additional analysis and identification of issues associated with the construction of a northbound left-turn has been added.
A-251 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, All 2009 citations for the City of Auburn Water, Sewer and Stormwater Comprehensive Plans should be corrected to 2015. On December 14, 2015, the Auburn City Council approved Ordinance No. 6584 that adopted the updated 2015 Water, Sewer and Stormwater Comprehensive Plans.	References are revised in Section 3.13.1.
A-252 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, the reference to 10,817 water customer accounts is incorrect. The City of Auburn has 14,800 water customer accounts.	The reference is revised in Section 3.13.1.
A-253 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, the City of Auburn receives water from the regional surface water system from Tacoma Public Utilities.	The reference is revised in Section 3.13.1.
A-254 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, the statement under the Sanitary Sewer heading that reads "The Alternative 1 site is within the Valley Sewer District" is incorrect. The Alternative 1 site is within the City of Auburn Sewer Service Area.	The reference is revised in Section 3.13.1.

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A-255 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, revise the storm utility quantities as follows: • 210 miles of pipe • 40 miles of ditches • 11,000 catch basins and manholes • 293 storage and water quality facilities • 7 pump stations	The references are revised in Section 3.13.1.
A-256 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, the reference to 15,900 solid waste and recycling accounts is incorrect. The City of Auburn has 19,000 solid waste and recycling accounts.	The reference is revised in Section 3.13.1.
A-257 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, Republic Services does not currently offer imbedded recycling. Customers are charged at the requested container size.	Section 3.13.1is revised.
A-258 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.1.3, the population reference for the population served by the Auburn Police Department - over 72,000 - is incorrect. Pursuant to the April 1, 2015 population estimated published by the Washington State Office of Financial Management. The City of Auburn's official population is 75,545 persons.	Section 3.13.1 is revised.
A-259 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.2.1, change all citations from 2009 to 2015.	The reference is revised in Section 3.13.2.
A-260 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.2.1, collected rainwater that is subsequently discharged to the sewer would be required to be metered for use in determining sewer discharge fees.	Section 3.13.2 is revised.
A-261 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.2.1, the City of Auburn's current Surface Water Management Manual edition is 2009, not 2014.	The reference is revised in Section 3.13.2.
A-262 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.2.1, the reference to the 2009 Comprehensive Stormwater Plan (2009) is incorrect out of date. The correct reference is the City of Auburn Comprehensive Storm Drainage Plan (Brown and Caldwell 2015).	The reference is revised in Section 3.13.2.
A-263 (Auburn)	Section 3.13: Public Services and Utilities	Pertaining to Subsection 3.13.2.1, the City of Auburn requests that the following issues and concerns of the Auburn Police Department be substantively analyzed and addressed in the FEIS: • Inability of large tractor trailers to exit "C" Street SW because of congestion of trucks and citizens queuing up to enter the facility. • Any failure to keep this area clean and safe will potentially attract illegal dumping of used appliances, tires, etc. near the entrance to the facility that would have a significant detrimental impact to the surrounding businesses. • The facility needs to be designed to ensure the ability for traffic to exit off of "C" Street W. It would be anticipated that any on-street parking currently available may be restricted due to traffic concerns.	Analysis is added in the FEIS to cover the potential for on-site queuing and impacts to the C street intersection. Possible on-street parking restrictions along 8th Street are also reviewed. Section 2.2.3.4 is updated to include a statement about litter control in the approaches to the potential site. Section 1.5.2 lists the regulatory requirements of site design and operation, including compliance with public health

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			requirements which address illegal dumping.
A-264 (Auburn)	On-site Wetland	Please note the following City of Auburn scoping comments that were submitted on April 5, 2013 and again on November 23, 2015 have not been satisfactorily addressed in the DEIS. The City of Auburn requests that the FEIS substantively address these outstanding comments identified below: • If the footprint of the new facility would avoid the area protected by the easement, the proponent will still need to demonstrate that the project would not alter hydrology on the property such that the wetland would be adversely impacted. • If wetland is to be impacted, mitigation meeting Auburn's Critical Area standards must be implemented. The City of Auburn maintains a No Net Loss standard of impacts to wetland function. • The Army Corps of Engineers may exercise Clean Water Act, Section 404 regulatory jurisdiction over this wetland if they determine that it is a Water of the U.S. Whether it is a water of the U.S., or an isolated wetland, the Washington State Department of Ecology does regulate this wetland. The two agencies may or may not be aware that the proposal is on a site that contains a wetland- the City may choose to invite the participation of the agencies in the scoping process to address this issue. An agency with jurisdiction (Ecology at a minimum) would likely want to see compensatory mitigation for any impacts to the wetland, which could require the proponent to provide up to 4-6 times the area in new compensatory mitigation, either on-site or off-site.	Section 3.4.3.1 addresses the potential impacts to the wetland and its buffer and compliance with applicable regulations, including the Auburn Municipal Code Chapter 16.10 Critical Areas. Additionally, see Response T-1.
A-265 (Auburn)	Area of Known Groundwater Contaminatio n	Please note the following City of Auburn scoping comments that were submitted on April 5, 2013 and again on November 23, 2015 have not been satisfactorily addressed in the DEIS. The City of Auburn requests that the FEIS substantively address these outstanding comments identified below: Disturbance of soils and groundwater on the site needs to comply with current State of Washington Model Toxic Controls Act (MTCA) remediation regulations. • Development of the site needs to include construction monitoring and long-term monitoring for presence and migration of TCE. • The following substantive questions pertaining to groundwater contamination should be analyzed: • How will dust and runoff during construction be contained to ensure public is not exposed to TCE, and contamination is not spread? • Where will disposal of any contaminated soils and groundwater removed from the site occur? • If site remediation were part of the project, how would project address continuing on-migration to the site from the TCE source to the south?	See Response A-205.

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		• What is the potential for health effects to customers and employees from ingestion, vapor, and dermal exposure?	
A-266 (Auburn)	General Comment	As stated at the beginning of this letter, the City of Auburn is OPPOSED to the siting and development of a recycling and solid waste transfer station at 901 C Street SW (Parcel No. 2421049054), Auburn, WA 98001 referred to as Alternative 1 in the DEIS. The City of Auburn believes for the reasons stated herein that Alternative 1 SHOULD NOT be the preferred alternative for the South County Recycling and Solid Waste Transfer Station. The City of Auburn expects that the King County Solid Waste Division will in its preparation of the FEIS respond appropriately and at the necessary level of detail to all concerns and issues identified in the City's response letter to the DEIS. The City of Auburn intends to fully participate in all aspects the Environmental Impact Statement (EIS) process and other affiliated processes in order to preserve its legal rights and insure that an adequate level of detailed and correct analyses are conducted. Further, the City reserves its right to pursue all appeal opportunities throughout the entire environmental review process and other decision-making considerations in the event the City feels that all environmental, land use and other issues are not fully evaluated and mitigated.	Comment acknowledged.
A-267 (Federal Way)	Land Use	City of Federal Way South East Potential Annexation Area (PAA) - The SCRTS preferred alternative is located directly adjacent to the City of Federal Way's PAA, the Jovita Subarea. The Jovita Subarea if annexed would be designated medium density residential in keeping with the RS 35.0 zoning (1 unit/35,000 square feet).	Comment acknowledged. The FEIS addresses current conditions.
A-268 (Federal Way)	Geologic Hazards	Critical Areas- The City's Critical Area's inventory indicates the proposed SCRTS is located within a Geologically Hazardous Area (map enclosed). In particular, the parcel is within a land slide hazard area. Adjacent properties to the west of 35101 West Valley Hwy. South, if annexed and developed are regulated by *Federal Way Revised Code* (FWRC) Article II, Chapter 19.145.220-250.	Comment acknowledged.
A-269 (Federal Way)	Land Use	Party of Record - The Community Development Department requests that the applicant provide the City with final site plans and related studies as the project progresses.	Comment acknowledged.
A-270 (Federal Way)	Water Resources	The City of Federal Way concurs with the conclusions stated in the EIS that either alternative (#1 or #2) will be required to comply with the requirements of the appropriate permitting jurisdictions storm water design requirements that are in place at the time of permitting.	Comment acknowledged.
A-271 (Federal Way)	Transportation	"Alternative 2" is not located within City of Federal Way limits. Since this is the case, the City cannot impose Federal Way's Traffic Impact Fee code to assess traffic mitigation fees. The City therefore utilizes SEPA with 10 Weekday trips and 100 Saturday Peak trips threshold for evaluating the development's adverse environmental impacts to the City.	Comment acknowledged.
A-272 (Federal Way)	Transportation	Per the King County SCRTS Draft EIS, the proposed transfer station is anticipated to increase trips by twelve (12) weekday PM peak hour trips and 108 Saturday peak hour trips when compared to the existing transfer station located at 35315 West Valley Highway South, Algona. These new trips will not impact any key intersections by ten (10 or more trips during the PM peak or 100 or more trips during Saturday peak period. Since this is the case, Traffic Division does not have any concerning pertaining to the adverse transportation impacts of the proposed development on the City's Transportation network.	Comment acknowledged.

Comment/ Response #	Topic	Comment	Response
A-273 (Federal Way)	Alternatives	The City of Federal Way concurs with the purpose and need for the project, and supports the Preferred Alternative (Alternative 2) in keeping with prior correspondence from elected officials focused on transfer station siting.	Comment acknowledged.

Commenter	Comment/ Response #	Comment	Response
Scoccolo, Tina (Terra Dynamics)	**B-1**	Please add my comments to the public record: Alternate Site 1, C Street SW Auburn, will have less environmental impact than Site 2. Building on Alternative Site 2, 35101 West Valley Hwy South, will negatively impact traffic, roadway condition, noise, and sedimentation control to a greater extent than at Site 1. **Traffic impact**: Gridlock - Efficiency/productivity loss. The impact on traffic at this site vis a vis Alternative Site 1 will be significant. West Valley Hwy S, at this location, already has high traffic volumes for most of the daylight hours with even more congestion during peak hours. Back-ups with gridlock of several minutes are routine and expected each evening. A fleet of trucks entering/leaving the roadway from the transfer station will only increase the gridlock hours per day. Reduction to the productivity and efficiency of the route service of the trash trucks will occur as egress wait time will shorten their round trips by at least 1 round a day. **Noise impact**: will effect a large population of nesting birds of prey (hawks, eagles) surrounding the property site. **Roadway condition**: The increase truck traffic will further deteriorate the already deplorable condition of the roadway and drainage features adjacent to it. There is crumbling asphalt, intermittent flooding and sedimentation releases. The site sits between unincorporated King County and the City of Algona - neither entity has improved this section of road with any form of repaving or regrading or drainage improvements in decades. **Sedimentation and Erosion Control**: Inadequate and poorly managed drainage features along this stretch of W Valley Hwy So already create siltation and erosion of ditch channels along the roadway. Without improvement to the roadway and neighboring property, the increased activity at this property site will exacerbate the problems.	Comment acknowledged. **Traffic impact:** Potential transportation impacts are described in Section 3.12.3. **Noise impact:** Potential wildlife impacts are described in Section 3.5.3. **Roadway condition:** West Valley Highway South frontage improvements and pavement overlay are described in Section 2.1.3. **Sedimentation and Erosion Control:** Sedimentation and erosion control are described in Section 3.1.
Ahn, Aimee	**I-1**	I am a resident of Vista pointe in Auburn, WA, and have recently become aware of the garbage waste transfer station that is being proposed to be built on West Valley highway. My husband and I purchased our home about 2 years ago, dreaming of raising our young children in this home, and taking care of my elderly parents in this home as well. We spent our savings investing into this home. How would you feel if I told you the city was going to build a waste transfer station in your back yard? More than half of the homes in our neighborhood overlook West Valley, and we sure don't want to see or smell the results of this waste station. Why is a residential area being considered for this site? According to the Alternative 2 Key Findings, air, odor, and noise impact will only be minor during construction. What about after the construction, can you guarantee that the air, odor, and noise will not continue to be impacted? And if it does remain to be impacted once the station is up and running, who will take responsibility for the changes that we, the residents, have to deal with then? Also, the potential for landslides, can you guarantee that won't affect our homes sitting on top of the hill on 56th Ave S? If had known prior to purchasing my home of these plans for the waste station, I would not have bought this home, and I know	Comment acknowledged. Potential visual quality impacts are described in Section 3.10.3. For odor, see Response A-57. Compatibility with existing land uses are described in Section 3.9.3. Potential air quality impacts are described in Section 3.2.3. For noise, see Response A-108.

Commenter	Comment/ Response #	Comment	Response
		I'm not the only one who feels this way. I, along with many of my neighbors, are against this site for the garbage waste transfer station. It's too close to our neighborhood. Please reconsider your site.	For geological hazards, see Response A-52.
Armstrong, Edward	**I-2**	Say and write what you will the potential for mudslides and vermin greatly exist with Alternative 2. Community is not in favor of the location 2. We desire less noise not more which this operation would deliver.	Comment acknowledged. For geological hazards, see Response A-52. Vermin and other vectors would be controlled as described in Section 1.5.2.For noise, see Response A-108.
Baker, Jeff & Gail	**I-3**	This project does not belong on the Algona site for the following reasons: 1. It is next to a residential neighborhood. The noise, odors, vermin and other problems associated with this type of facility will be detrimental to this area and will affect property values. 2. The property is zoned heavy commercial. This is not considered a commercial use. It belongs in an industrial zone which is normally farther from residential zones. 3. The City of Algona agrees with #2 since this use is not allowed in this zone, but is allowed in light industrial zone. While a "recycling collection station" could be allowed with a conditional use permit, the transfer station function is not specifically listed. 4. The creek running through this property makes it very difficult to develop. The required buffer zone limits the area where this facility could be developed. The assumption that the proposed building could be built inside of the buffer and even over the creek itself is contrary to the normal development rules that are followed to protect the environment. It is disturbing that King County would think that the normal rules do not apply to this project. 5. The steep hillside on the west side of the site could be prone to landslides. Historically, and especially in recent years, landslides along the west side of the Auburn valley have occurred in many locations. Development along the toe of the slope could have an effect on the hillside, putting the houses above in danger. We encourage you to consider other sites. The Alternative 1 site seems to be a much better choice.	Compatibility with existing land uses are described in Section 3.9.3. For noise, see Response A-108. For odor, see Response A-57. Vermin and other vectors would be controlled as described in Section 1.5.2.For property values, see Response A-9. Consistency with zoning is described in Section 3.9.3.1. The potential project is an essential public facility, which is a conditional use allowed in the current zoning. Potential water resources impacts are described in Section 3.3.3. This project is required to comply with all applicable regulations and permitting procedures. Additionally, see Response T-2. For geological hazards, see Response A-52.
Brekke, John	**I-4**	I hereby request that the following comments be documented and incorporated in the King County Solid Waste DRAFT EIS on Algona Transfer Station Replacement Project: 1. The Algona site has superior freeway access to SR 167 and SR 18 with on ramps in close vicinity therefore reducing traffic and road impacts.	Comment acknowledged.

Commenter	Comment/ Response #	Comment	Response
		2. The existing and proposed new Transfer Station has been in Algona and the community has evolved around it. 3. The Algona site has no direct residential connection as homes are perched far above on hill with no direct access. 4. King County has already spent millions of dollars acquiring adjacent land parcels in Algona and has the ability to remodel, expand and/or rebuild there with less risk. King County acquired these land parcels in 2012. 5. The Algona site is already zoned for a transfer station use. 6. The Algona site has greater acceptance with surrounding residences, businesses and cities.	
Brekke, Eleanor	**I-5**	Please note and incorporate the following comments as part of the King County Solid Waste DRAFT EIS on Algona Transfer Station Replacement Project: 1. The Algona site is least impactful to the community being located between SR 167 and the hillside. 2. Local Algona businesses and residences have developed around and become accustomed to the existing Algona transfer station which is operating adjacent to proposed Algona site. 3. The Algona site has a simpler and less expensive EIS process which saves time and hundreds of thousands of tax payer dollars. The Algona site has been studied and invested in for years by King County and the City of Algona. 4. The Algona site is well above the flood plain with the ability to operate in a flood event while not causing widespread contamination. 5. The Algona site is the fiscally responsible alternative due to the fact that King County already owns the proposed new Algona transfer station land and has been studying this alternative for years.	Comment acknowledged.
Cavness, Shawn	**I-6**	My name is Shawn Cavness. My wife Wendy and I moved into a house on 56th in Auburn 2 years ago. We moved here with the understanding that we were moving into an upscale neighborhood with growth potential very near restaurants, movie theatres, the Puyallup fair and Emerald Downs. Our house backs to a green belt and if you didn't know better you would think you were in the country rather than in the middle of civilization. We love this area, our house, our neighborhood and our proximity to so many great services. What I didn't expect was to have a garbage dump built 5 blocks from us. Besides the annoyance of building something so trashy so near a group of very nice houses there is the very real potential for the loss of our property values and the lowering of our standard of living. As property values drop houses will not be maintained and our beautiful neighborhood will degrade. Facilities like that being contemplated for our neighborhood do not belong in residential areas. They should be built in an industrial area. There are plenty of industrial areas in the Kent/ Auburn/Sumner valley that would be much more reasonable to erect a garbage facility than within a short distance of new upscale and expensive houses. Please reassess the decision to build a garbage facility so close to our beautiful neighborhood.	Comment acknowledged. For property values and socioeconomics, see Response A-9. Compatibility with existing land uses is described in Section 3.9.3. Section 1.3 provides a summary of the site identification process background.
Choe, Byoung & Jinny	**I-7**	I recently learned about King County planning to build a new and much larger transfer station right below my home. My family and I are very much against this decision. We recently purchased this new home in a budding and thriving community and we strongly believe that if the County follows through with this plan it will be to our detriment. There is a lot of development of single family homes in this area, even if you	Comment acknowledged. For noise analysis, see Response A-108. For odor analysis, see Response A-57.

Commenter	Comment/ Response #	Comment	Response
		cannot see it from the transfer Station itself. We are directly above it and are concerned about noise, odor, gases, hazardous materials, and many other things that will come with this. There are many families with children here and we are deeply concerned about the environmental and health consequences of such a decision to build in the current transfer station location. My understanding is that there is an alternative proposed site that is much more appropriate for a large transfer station that will still have many of the benefits of the Algona site but very little of the negative aspects, such as families living adjacent to the site. The other transfer stations, such as the one off I-5 and 1st Ave Bridge are not nearly as close to family communities are this current proposed site. We strongly believe that the County should consider an alternative site to minimize the impact on our community, our health, and our home values. Please hear our concerns and move the proposed site to a different location.	Potential air quality impacts are described in Section 3.2.3. Potential hazardous materials impacts are described in Section 3.8.3. Compatibility with existing land use is described in Section 3.9.3.
Cowan, Sally	**I-8**	The preferred Alternative is fine with me. I would like to see rock recycling and yard waste recycling at lower rates. I would like to see us keep the costs (construction costs) down – limit the amount of King County overhead down and use local contractors where/when feasible.	Comment acknowledged.
Cox, Jennifer	**I-9**	I am in complete disagreement with the "preferred," location of a garbage and waste transfer station to be built in the environmentally sensitive creek bed and wildlife area of Peasley Canyon located directly below the much improving neighborhoods of new and existing homes located on 56th Court South and South 348th Place. I have attended the first open house meeting and plan on attending the next meeting at the American Filipino Hall on Thursday. While I was at the first meeting I asked why this site is preferred to the other site which is located in a zoned industrial area on C street in Auburn. None of your officials were able to answer my question definitely. As a resident of the new neighborhood of Vista Pointe, I noticed that the maps on view at the meeting were incomplete and did not even list my home's location (which is, literally on the edge of the valley overlooking your preferred location site). Does this mean that King County is unaware of the fact that my home and several others are here within sight, sound and smell of the proposed site? I did not see a copy of the environmental impact survey at the previous meeting does one exist? What about the possibility of a landslide due to disruption and development of this environmentally sensitive (the City of Auburn has posted signs detailing the fragile natural environment along the precipice of the canyon) area which backs directly onto the land which my new home sits? No doubt, there will be an increase in vermin behind my home due to the addition of a waste and garbage transfer site in such close proximity to residential homes. Will King County pay for exterminators to come and rid the home sites of rats where our children play? What about the extra debris which doesn't make it into the transfer station and ends up traveling on the frequent, breezy, up drafts to 'end up in my yard, on my street and in the yards of my neighbors? How will this "preferred," location affect my new home's market value? Will King County lower my property taxes because my location has been devalued due to a	Comment acknowledged. The EIS analyses the environmental impacts of the proposed Action Alternatives, including: Compatibility with existing land uses are described in Section 3.9.3. Potential visual quality impacts are described in Section 3.10.3. For noise analysis, see Response A-108. For odor analysis, see Response A-57. Copies of the DEIS were available at both public meetings and at http://your.kingcounty.gov/solidwaste/facilities/algona/ For analysis of geological hazards, see Section 3.1.3.1.

Commenter	Comment/ Response #	Comment	Response
		garbage and waste plant within sight, smell and ear-shot of my home? Probably, not! Mr. Creegan, what will you do to answer and address the concerns of myself and my neighbors? I am extremely concerned about the preferred Alternative site location on the W. Valley Hwy. Not only is the site very environmentally sensitive (there is a protected wildlife wetland and creek running through the site from the bluff above) but there is also existing established neighborhoods as well as a brand new neighborhood of homes which directly sit above the proposed site of the preferred site. The preferred site has its ease of access from the highway but, has anyone considered the impact this transfer station will have on the families, homeowners, growing children, property values, pollutants, air quality, noise pollutions, rising smells/up drafts, etc. I do not accept and strongly object to the "Preferred Alternative" location. This location will not be good for me, my neighbors, my family, or the community of families who will be forced to live above a waste transfer station. Our property values on new homes will fall dramatically. I will appeal to the King County tax assessor for an adjustment for a lower property value. This eventually means less tax revenues for King County on homes which are less than two years old. I do not feel that there has been enough research information considered, or realization of the full impact this will have on my community! Would you want to live directly above a waste transfer management site? I DON'T!	Vermin and other vectors would be controlled as described in Section 1.5.2. Elements common to Alternatives 1 and 2, including litter control, is described in Section 2.2. For property values, see Response A-9. Potential impacts on water resources and wetlands are described in Sections 3.3.3 and 3.4.3. Potential air quality impacts are described in Section 3.2.3.
Davies, Deane	**I-10**	As an employee of the Auburn School District Transportation Department, I've got two main concerns. 1. Traffic on C St. SW is very bad, even on the off hours of rush hour. It is very difficult for the school bus to exit the compound and is often times quite dangerous. I'm afraid that the 901 C St. SW location would only add to an already dangerous situation. At one time (40 years ago or more), the Auburn Stock Yards were located there. To this day, when I am outside pre-tipping my bus, I can catch a whiff of what waste to cows produced. I'm worried that a transfer station at the site may cause more offensive odors. In conclusion, I believe that the Algona (Alternative II) sight would be the best location.	Comment acknowledged. Potential transportation impacts are described in Section 3.12.3. For odor analysis, see Section 3.2.
DeWitt, Scott	**I-11**	I'm concerned about the loss of property value, with this transfer station proposed in Auburn. Also the smell, the noise, the stability of the hillside, and a 24 hour operations means constantly being affected by this problem. Do not build this facility right below myself and my neighbors. Go to an industrial area.	For property values, see Response A-9. For odor analysis, see Response A-57. For noise analysis, see Response A-108. For analysis of geological hazards, see Response A-52. The facility will not operate 24 hours per day. Potential operating hours at the facility are described in Section 2.2.3.1.

Commenter	Comment/ Response #	Comment	Response
			Compatibility with existing land use is described in Section 3.9.3.
Duffy, Michael	**I-12**	I live next to the transfer station and it stinks – toxic, they don't clean it unless I complain. The diesel trucks stink and cars they have in there. Can't walk down the sidewalk there. Also the noise from the banging and dumping etc. Can't have more people over to my house outside because the stench will make you sick. It is stinking today! Health problems. Really I can't go out in my yard some days! Toxic! I want it moved to Auburn.	Comment acknowledged.
Dupoint, Juanita	**I-13**	After attending the open house in Algona tonight it is my feeling that the "preferred" Alternative for the new transfer site is the best option. We live across the freeway from the current transfer site and the smell alone in the summer is enough to make you want to move. Putting it in the middle of the businesses in the first alternative plan would surely cause a decline in business. My vote would be to Rebuild or Alternative site One.	Comment acknowledged.
Elliott, Len	**I-14**	I strongly prefer constructing a new solid waste recycling and transfer station at Alternative 2 -- 35101 West Valley Highway South, Algona.	Comment acknowledged.
Eneberg, Mike & Kara	**I-15**	As a resident and home owner of someone who lives in downtown Auburn area, I plead with you do not place this in the downtown area. It would be significantly detrimental to the housing prices and upward mobility of the neighborhood. I strongly suggest to keep the Algona location for future purposes. Please consider the long term impacts to all of the residents that have to live near this facility, and deal with the traffic and material that it will attract. The downtown exits are already a hazard for vehicles that back up onto the freeway, and adding more traffic to these exits would jeopardize public safety. Thank you for your consideration of my interest in this topic as I am a homeowner and someone who believes that Auburn can and should be looking to make significant improvements that will attract homeowners to this area.	Comment acknowledged. See Response A-9 regarding property values. Compatibility with existing land use is described in Section 3.9.3. Potential transportation impacts are described in Section 3.12.3.
Escobedo, Dee Anna	**I-16**	I am a resident of the City of Auburn in the new development of Vista Pointe. Thank you for this opportunity to respond to the construction of a Transfer Station in one of the two proposed sites in Auburn. I would like to state my concerns about the building standards used for either site (or hopefully another) that is ultimately chosen. As I can see, it will happen, either at the foot of the precarious hillside upon which homes are built; or near a large shopping development and motel/hotel. In my opinion neither is a good solution. I would hope that there would be a location much farther away that has not yet been developed. Then, in the future, a development can be planned knowing that the Transfer Station is located there, the buildings – either residential or commercial/industrial - can plan around the transfer station, IN ADVANCE. My concern is to address the building standard - no matter where it is located - hopefully outside the city limits of ANY city, or in Auburn.	Comment acknowledged. The site identification process is described in Section 1.3. This includes criteria that the facility be located within the south county service area and within the urban growth area. Compatibility with existing land use is described in Section 3.9.3. LEED is described in Section 2.2.2.3. For analysis of geological hazards, see Section 3.1.3.1. Potential impacts on fish and wildlife and mitigation are described in Section 3.5. Potential

Commenter	Comment/ Response #	Comment	Response
		I request that you use LEED (Leadership in Energy & Environmental Design) building standards at the Platinum level and the most over 80 points as possible. Please know that the environment is crucial especially the safety of the hillside in the event of an earthquake, or other strong storm or even avalanche that would affect the entire valley, as we are indeed close to the Mt. Rainier volcano. Also, the flora and fauna in the area is important to maintain healthy air quality and environment in general. And the two culverts that have been previously installed need to be addressed in possibly preserving the Algona Tributary so that more fish might be able to live there naturally and birds will have a source of water. And of course, there would be a natural low point for all water to flow instead of on the hillside below the homes above. More plantings of trees and native shrubs would be very beneficial as well. I attended the open house at the Filipino-American Hall and was thankful that the information was made available locally. I am grateful to live in a country where citizens' voices can be heard on these large community projects. I am sure much time and money has already been spent. However, I am still perplexed as to why a Transfer Station must be built so close to a freeway multiplying the traffic situation as well as so close to homes. And if the other alternate location is chosen, it would be near a regional shopping center, movie theater and right next door to a hotel/motel. So to finalize, I would prefer that a third location be planned and built to LEED standards away from any type of current development so that planning on that future development can occur with a large buffer of trees, etc. away from the Transfer Station. I would think it will cost less money in the long run to find a third location than to build on either one of the two proposed current locations. Thank you and I sincerely hope you take my comments seriously and address my concerns. Oral comment: DEE ESCOBEDO: Dee, D-e-e, Escobedo, E-s-c-o-b-e-d-o. And I live at 5621 South 336th Place in Auburn, Washington 98001. And I'm here today on March 3rd of 2016, and I appreciate the King County Solid Waste Division having this open house for comments on the Draft EIS. And I would like to propose, if you do use the preferred site along West Valley Highway that you definitely mitigate all, you know, terribleness to the environment, terribleness to the environment. And keep either fish or birds or even wildlife around the environment -- around the location of the transfer station so that the water is able to properly flow as it I would naturally or re-divert it so that fish can live and we can have fresh water areas that are natural to the wetlands, and to have fish to be able to fly and not be, you know, avoiding the area because of noise or contamination or odor that the birds themselves would not like.	impacts on vegetation are described in Section 3.4. Potential transportation impacts are described in Section 3.12.3.

Commenter	Comment/ Response #	Comment	Response
		And also maybe have a walking trail of some type so children and adults can go, especially on the southern end of the property. Possibly at the southern end of the property you'd have an area dedicated specifically for that or for a walking trail. So my suggestion is to mitigate any and all of the construction, if you choose to do it at the preferred site, so that the natural environment can be as close to its original natural state as possible and to save the Earth. We build so much and never take into consideration the Earth itself, so I would like to comment that please mitigate all of the construction, if you do choose it at that spot, to mitigate it by doing something positive for the Earth via trees, via, you know, growth, the birds, fish, et cetera. And I appreciate being able to say this at this time, at this meeting, but I will also make other comments that I have -- as I have found out I would be able to, but I wanted to take advantage of the services today. Thank you.	
Faulder, Ralph	**I-17**	I live at 34239 56Th Ave S, Auburn WA and recently found out about the Counties plans to place new large solid waste transfer station in the valley almost directly below my residence. This residence is part of a new and ongoing housing development with homes in the $300-$500 thousand plus range. I do not feel that the residence of this development should be burdened with the possibility of having their property values decline due to the placement of the transfer station in such close proximity to their homes. I am at this time expressing my opposition to this plan and encourage the County to find a better suited location for the solid waste transfer station.	Comment acknowledged. See Response A-9 regarding property values.
Gauthier, Kevin	**I-18**	My family and I live on the hilltop right above the proposed "preferred alternative" site and can't imagine how this is even an option that is being considered as a building site for a transfer station. Our backyard literally backs up to the proposed west valley highway site property, so we have major concerns and are frankly outraged that it is even being considered. The first we hear of this proposal was by a concerned neighbor who stopped by a couple of days before the meeting that was held at Auburn High School, which though on short notice, my wife and I attended. We learned of the 3 options that are being considered (keep existing site, the C St option and our backyard). While I understand there is always a "not in our backyard" mentality, this time it is literal and translates to virtual destruction of our view homes above the site and dropping property values throughout our neighborhood. I am not sure why we have not been informed until now, but this is also a serious concern of ours. We purchased our home a little over 2 yrs ago for the quiet neighborhood with a beautiful view, then plopped down our life savings to live here. The proposed site would mean noise, air pollution dumping into our yard as it wafts up the hill, deteriorating the hill putting our properties at risk, rats and other rodents that dump sites attract, truck traffic and several other concerns. I was told at the public meeting that the C street option was in an industrial area that is not at all in a neighborhood. Please do what you can to keep our property values and living conditions the way they are today by not building on the proposed West Valley site.	Section 1.6 describes the public involvement process. The first public notification of this project was mailed on October 30, 2012. For noise analysis, see Response A-108. Potential air quality impacts are described in Section 3.2.3. For geological hazards, see Response A-52. Vermin and other vectors would be controlled as described in Section 1.5.2.Potential transportation impacts are described in Section 3.12.3. Compatibility with existing land uses are described in Section 3.9.3. For property values, see Response A-9.

Commenter	Comment/ Response #	Comment	Response
Gunderson, Doug	**I-19**	I am writing to voice my opinion that Alternative 2 site be used for the final replacement site for the South King County station. Not only is the Algona site close to the old one, it is on the same road, away from the already overcrowded C street SW proposed location. Locating at the Auburn location is asking for not only more congestion in a heavily congested area, but just asking for more accidents. We don't need this short-sighted planning. I suspect the City of Auburn would like it in Auburn for fees they might be able to collect. Let's keep it in the area it currently is, and not add to the traffic problems already plaguing the streets of Auburn.	Comment acknowledged.
Hanson, Keith & Cindy	**I-20**	I am writing to add my comments to the proposed new transfer station. I live 500 feet from the proposed station directly up the hill from the West Valley site. While obviously I don't want it built close to my home I know it has to be built somewhere. This seems like a no brainer to me even if I did not live close. An industrial park like the C Street proposed location seems obvious. I work at the Boeing Auburn plant which will be close to the C street site. I drive by the proposed C Street site all the time. It's mostly industrial with the ability to handle the large trucks. Industrial areas are where noise and air emissions are common and acceptable, like the Boeing plant on 151 h street. As for construction and location, the flat land at C Street is an easy build that should not have many surprises. The West Valley Site will be tucked right in the hillside. It will present real potential problems for construction and long term use. The hillside here is not that stable, they just 2 days ago we had a landslide on West Valley Hwy about 10 blocks north of the proposed site. Just to the south the king county roads that go up the hill at 55th have been closed for 2 years because of a slide. I talked to the roads dept. and the guy in charge said King County doesn't have the money to fix the road, so I have had to change my driving route to and from work for the last 2 years!!! If they have no money to fix the roads, where would they have money to fix a landslide at the proposed West Valley site??? I can choose to work in an industrial park with businesses that have lots of truck and other noises, as well as noxious smells. I can choose to buy a house next to an industrial park and deal with the noise and smells, and accept lower housing prices as a result. I did not choose my current house location near an industrial park. I did consider the current small transfer station and odors As well as the noise from the 167 Hwy. We carefully considered these things. The noise is ok and we only have had a few times the smells from the current station have come up the hill in the summer over the last 20 years.	Comment acknowledged.

Commenter	Comment/ Response #	Comment	Response
		To me it seems like the choices are simple, the 288th site and the West Valley site are close to residential homes, An industrial park setting like C Street or somewhere in an industrial park setting in the valley seems to be an obvious choice.	
Harker, Young Kim	**I-21**	We would prefer the Alternative 2 site in Algona. Site Alternative 1 is too close to the Fashion Mall, Walmart, and the Movie Theater,	Comment acknowledged.
Harkness, Marie-Anne	**I-22**	Oral comment: MARIE HARKNESS: Marie Ann Harkness, H-a-r-k-n-e-s-s. I've spoken many times about the location and my preference that it -- the South County Transfer Station be located where it currently is in Algona or adjacent to the Algona site. But I have not talked very much about the size of the building, and I do have an opinion about that. I don't believe it needs to be as big as Factoria. It could be smaller because we have recycling that is required of us here in Auburn. So we have curbside recycling. And our tonnage is -- historically continues to be getting less and less, so our need for a large facility is not as necessary as it is in north county where they have higher tonnage and no recycling requirement. That's about it. One more thing. My major concern as a taxpayer is that we not overbuild our facility and be left with a dinosaur five, ten, fifteen years from now, not using -- not needing to use the facility as it was built. Voila. 29780 53rd Avenue South, Auburn, 98001. The "C" Street site is adjacent to Auburn baseball park of 2 heavily used recreation facility for the region. Traffic is already a concern. Having a transfer station next to where children and adults play would not be optimal because of traffic, noise and some spillage odor. The Algona site has been in operation since the 1960's. Anyone who built a home nearby did so with full knowledge of the transfer site's existence. The land values and home values have historically been lower in the area so homeowners have had the benefit of lower home and taxes over the years. I urge you, as I have from several years ago, to select the property adjacent to the current site in Algona.	Comment acknowledged. Elements common to Alternatives 1 and 2 are described in Section 2.2.
Hatch, Susan	**I-23**	Our house sits on the west hillside above West Valley Hwy. It is considered view property. Alternative #2 will be adjacent to our east property line of the hillside. The traffic noise from Hwy 167 is blocked by the trees below our house down to West Valley Hwy. All that sound buffer will be gone with Alternative #2. Our neighborhood will have increase road noise plus the noise from the transfer station - compactors, increased truck and use traffic. In addition, our house will look directly down on Alternative #2 when the trees are removed for construction. I believe our house devaluation will decrease by more than 50% with Alternative #2. Why are you putting it directly adjacent to neighborhoods! We've lived in our view property home for 19 years. We've worked hard to increase our equity in the house and are dependent on the value for our retirement years. Address is 34926 57th Ave S, Auburn, 98001. We are directly west of the Alternative #2 site. Our east property line is approx. half-way down the hillside on West Valley Hwy. Our property line will be right on the west property line of option #2! We are concerned about noise from compactors, noise from increased traffic, etc. We are concerned	For vegetation impacts, see Section 3.4.3.1. For noise, see Section 3.7.3.1. Potential transportation impacts are described in Section 3.12.3. Potential visual quality impacts are described in Section 3.10.3. See Response A-9 regarding property values.

Commenter	Comment/ Response #	Comment	Response
		about landslides from construction (our house sits on the edge of the hillside). We are most concerned about devaluation of our property – no one will buy a house that borders a transfer station. Appraised value 2 years ago was $450,000. Draft EIS has pictures of our neighborhood that are blocks away from houses that will actually border Alternative #2. Why don't you have pictures of homes that will be actually be impacted! Layout of Alternative #2 shows you will have to dig into our hillside where our house is sitting. Have you done geological studies that will ensure our house will not be affected by landslides. EIS doesn't show impact on neighborhoods most affected by Alterative #2. Tell the truth!	For geological hazards, see Section 3.1.3.1.
Hatch, Duane	**I-24**	Why is Alternative #1 on C Street not the preferred location? It's all industrial with no impacts to neighborhoods. We live in the neighborhood directly west of site #2. We have a growing neighborhood – all the 100+ Main Vue new houses under construction, plus another new neighborhood currently under construction just south of 352nd and 56th Ave. We will have big impacts to our neighborhood if site #2 is chosen – 1) property devaluation 2) concerns of hillside our house is built on 3) noise 4) smell 5) increased traffic on W Valley Hwy that already has major issues. Keep the dump out of our neighborhoods!	The preferred alternative is described in Section 1.8. Compatibility with existing land uses are described in Section 3.9.3. For property values, see Response A-9. For geological hazards, see Response A-52. For noise, see Response A-108. For odor, see Response A-57. Potential transportation impacts are described in Section 3.12.3.
Hoosen, Sue Van	**I-25**	Oral comment: SHIRLEY TUCKER: This is Sue and she lives across the street from me. They're trying to make another smelly thing out there. Do you want to complain? SUE VAN HOOSEN: What smelly thing? It's not smelly now. SHIRLEY TUCKER: Yeah, because they fixed it. Now they want to make a bigger one. SUE VAN HOOSEN: I can't smell anything. Why not? SHIRLEY TUCKER: You're going along with it? What did you say? SUE VAN HOOSEN: What do you think they're going to do, Shirley? SHIRLEY TUCKER: They're going to make it bigger. SUE VAN HOOSEN: It probably needs to be bigger. SHIRLEY TUCKER: Okay. That's what she said. She can smell it. Not me. I'm going to sell my place. SUE VAN HOOSEN: I can't smell it. SHIRLEY TUCKER: No, he fixed it. Dave, when he -- SUE VAN HOOSEN: Why isn't he going to fix the new one? SHIRLEY TUCKER: Because somebody's wanting to come in and make it bigger, and that's what this meeting's about.	Comment acknowledged. For analysis of odor impacts, see Response A-57.

Commenter	Comment/ Response #	Comment	Response
		SUE VAN HOOSEN: Well, let's listen to what's going on.	
Humphrey, Amy	**I-26**	I am writing to urge you not to select the current preferred location for this recycling and transfer station. My husband and I are homeowners in the neighborhood directly above West Valley Highway (Vista Pointe), and we are very concerned about the negative effects this transfer station may have on the value of our property and the quality of living in our neighborhood. Aside from the good possibility of our home value decreasing over time as a result of this station, we would never have even purchased a home in our current neighborhood if we had known this station location was being considered. As Vista Pointe homeowners, we communicate on a regular basis with our neighbors, and we all try very hard to keep up and improve our properties. We also vote to make overall improvements and implement safety measures to our growing area. It goes without saying that we would all like our property to increase in value in the future, and we feel strongly that this station would decrease the value of our entire neighborhood. Positioning a transfer station so close to our properties would also cause increased odors (especially in the warmer months), increased noise, and increased vermin infestations that would cause our quality of life to suffer. We want our neighborhood to be a beautiful, safe, pleasurable place to live and play. We want our house value to increase, not decrease. And we want any future house buyers in our neighborhood to feel clean, safe and welcome at Vista Pointe. Please remove the West Valley Highway location from your list of possible transfer station sites. My husband and I are not able to attend the March 3 meeting, but please consider our concerns and address these concerns with my fellow neighbors who will be attending and are also very much against the West Valley Highway location.	Comment acknowledged. See Response A-9 regarding property values. For odor, see Response A-57. For noise, see Response A-108. Vermin and other vectors would be controlled as described in Section 1.5.2.
Hurlbut, Terry	**I-27**	Recycling of electronic components should be incorporated into any new facility. Reducing trips, by individuals, to recycle electronic components is inefficient and wasteful. Recycled electronic parts could be collected then transported to an electronic recycler or they could come to the transfer station to pick up the components.	Comment acknowledged.
Kang, Insung	**I-28**	My name is lnsung Kang who live 5637 S 344th Ct, Auburn WA 98001. I am against to build Recycling & Transfer Station at 35101 west valley highway south, Algona. Because this area is residential. I can think problems when built it. • Possible Bad Small • Property value down • Traffic on West Valley Road	Comment acknowledged. For odor, see Response A-57. For property values, see Response A-9. Potential transportation impacts are described in Section 3.12.3. Vermin and other vectors would be controlled as described in Section

Commenter	Comment/ Response #	Comment	Response
		• Vermin • Instability of the hillside • Possibility of hazardous waste exposure Can't open my home windows	1.5.2.For geological hazards, see Response A-52. Potential hazardous materials impacts are described in Section 3.8.3.
Kesgard, Laurie	**I-29**	I live in the Vista Pointe Neighborhood on the ridge above where there is a proposal for a new recycling and transfer station. I strenuously object to this new location for several reasons. Noise, smells, and vermin will negatively affect our entire neighborhood. In addition, the value of our homes will go down. I truly hope, in the interest of our community, another location is chosen instead of Alternative 2.	For noise, see Response A-108. For odor, see Response A-57. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For property values, see Response A-9.
Kim, Hea	**I-30**	Oral comment: HEA KIM: First H-e-a, last name K-i-m. And I live in the Vista Point. I just moved – last year I moved to a new construction house up there, and because my neighborhood sits on top of the hill, the West Valley Highway, and we're concerned if you have a construction right under the hill, it might going to affect whatever the foundation or the ground or -- or kind of fumes or -- facility comes up to the – in the air, and that's why we are concerned. So we prefer, yeah, you can build it away from the residential area because you have second choice, which is in Auburn downtown, C Street. That's our main concern. Because it's a new home -- it's a new home area right there. So if you build a construction there, you know, we're kind of worried about the effect of the foundations or the ground within the hill. We think it's some kind of -- I don't know what -- big storms or -- little -- earthquake. Yeah, we worry about that. Yeah.	For geological hazards, see Response A-52. Potential air quality impacts are described in Section 3.2.3.
Kirschbaum, Devon	**I-31**	I fail to understand the misguided thought process behind building a massive new solid waste transfer station just yards from a neighborhood of new single family residences. It astounds me that just because this proposed project abuts a hillside, there is nobody within your department that can clearly see the hundreds of houses perched just above whose occupants' lives will be negatively affected. What rationale could there be to propose endangering the health, financial and emotional wellbeing of the people living mere yards from this project? Everyday products that are used and thrown away contain more dangerous and health-affecting chemicals than ever before. More than 60,000 untested chemicals pervade the consumer products on our shelves and in our homes. These chemicals produce gases as they decompose and create a clear and obvious threat to human health as well as a threat to our environment from the hazardous contaminated air emissions. These toxic gasses rise and are carried by the slightest breeze. These toxic gasses will envelope the neighborhood right above with devastating effect.	Comment acknowledged. Section 1.5.2 describes the regulatory oversight of public health for the proposed facility. The types of waste accepted at a transfer station are strictly controlled by the division through King County Public Rule PUT 7-1-4(PR), Waste Acceptance Policy (King County 2009). This rule prohibits disposal of hazardous or dangerous waste, burning or smoldering material, infectious waste, excessively odorous or dusty material, and various other

Commenter	Comment/ Response #	Comment	Response
		Studies have shown that people living near landfills and solid waste transfer facilities have suffered from lung and heart diseases that originated from the toxic gasses which are released from the degradation of chemicals trapped within plastics as well as chemical based home cleaning products. Studies have shown significantly reduced height among children who live near these facilities as well as Immune Deficiency Syndrome. Are you sir, willing to risk the future of the many young families who live just yards away from this proposal? Can you live with your conscience if you willingly endangered the lives of children who will be negatively affected with lifelong medical abnormalities? Mr. Creegan, as Project Director of this proposal, I implore you and the King County Council representatives to seek another site away from this high density neighborhood. South King County has ample, undeveloped industrial land that would be much more appropriate for a solid waste transfer station. This common sense approach will benefit all who make South King County our home.	materials. Household hazardous waste is exempt from regulation as hazardous waste. Compatibility with existing land use is described in Section 3.9.3. Potential hazardous materials impacts are described in Section 3.8.3 Potential air quality impacts are described in Section 3.2.3.
Klahn, Tim & Cheryl	**I-32**	Thank you for taking a moment to consider my concerns on the proposed Algona transfer station. I am in complete disagreement with the "preferred," location of a garbage and waste transfer station to be built in the environmentally sensitive creek bed and wildlife area of Peasley Canyon. This location at the base of a steep, actively sliding slope will greatly increase the Geological Hazards for this area. Long term construction will continually assault the surrounding hillside making it even more unstable. Followed by non stop traffic and heavy use trucks. The potential risk of a slide at the operation with the potential to kill customers and workers should not be blindly pushed away with assurance of retaining methods. This is mother nature's hillside. The environmental impact seems to be just an accepted casualty in this proposal. The work currently done on environmental remediation in this area has been ongoing. The Peasley Canyon area and the green belt extending along the bluff where the new station is proposed is a sensitive area that is protected from development in many areas in this community. The wetlands are already at risk from the road runoff from the surrounding highways and increasing road volumes, adding a potentially toxic filled transfer station in the middle of it hardly seems like a "preferred option" Along with the normal vermin that come along with garbage in open trucks along the roadways, such as rats, mice, birds etc. The impact of the large roost of crows that populates this particular part of the valley will bring substantial waste to the surrounding area. Prior suits have been brought in neighborhoods with not nearly the attraction a garbage dump will have on crows. Neighbors suffered over $200,000 in damages in one instance alone from the crows waste and dropping of garbage in yards and on roofs attracting more rats and other birds. I've experienced this first hand at another home and it was a nightmare. The county will be responsible for all the clean up and damage brought by the crows and other birds. There are many more homes and communities above this location now than there were in 2012 when the property was purchased.	Comment acknowledged. For geological hazards, see Response A-52. Potential transportation impacts are described in Section 3.12.3. Potential hazardous materials impacts are described in Section 3.8.3. Potential wetland and vegetation impacts are described in Section 3.4.3. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For property values, see Response A-9. Compatibility with existing land uses are described in Section 3.9.3.

Commenter	Comment/ Response #	Comment	Response
		The impact physically to the roadways is also of great concern, have you driven on West Valley Highway, surrounded by wetlands, the road is broken and full of pot holes that reappear with each rain. The flooding and landslides cause shut downs of the roadway annually. With volume continuing to increase in this commuters corridor the current local infrastructure would not be supportive. Has the County considered the expense of the major road construction needed to accommodate such a facility. This area is also filling with residential communities and the resurgence in Algona as an affordable family living community, a transfer station does not seem like the right use of this land. Instead small commercial, manufacturing or other low impact use would be more complimentary. The option in Auburn has less community impact on Home Values, not located near residential neighborhoods. Auburn has ease of access and does not impact the "choke point" in the south bound commute. The surrounding areas are more complimentary to a transfer station with less environmental hurdles as the Algona location. For these reasons I respectfully insist that the location of 35101 West Valley Highway South, Algona be removed from the list of possible sites for the new garbage collection facility.	
Kone, Brian	**I-33**	Very concerned about odor with your preferred site. Have you studied laminar air flow that takes odor right up the hill to the new Main Vue neighborhood? With air flowing through to transfer station and up the hill it may adversely affect property values. Our new neighborhood home values range from 500,000 to 600,000. Right now our neighborhood can smell the existing station. It would be sad if this had the same impact on home owners that cedar hill landfill neighbors experience. (I recently moved from that neighborhood).	Comment acknowledged. For odor, see Response A-57. For property values, see Response A-9.
Li Villalobos, Chuck	**I-34**	Alternative #2 at 35101 West Valley Highway S or any other residential area for that matter should NOT be considered as a location for a new Solid Waste Transfer Station. My wife and I are first time home buyers and when we were considering locations, we chose to live in King County, instead of other nearby counties, because we have seen the quality projects King County has undertaken over the years and believed that officials took seriously their commitment to make choices that benefit the residents they serve. That is why I am appalled by the fact that 35101 West Valley Highway S would be considered as a location for the new Solid Waste Transfer Station. If you purchased a new home and not long after found out that a garbage dump was going to be built in your backyard, I imagine you would do everything in your power to stop it. Why? Because there are a myriad of negative things, health, economic, and otherwise, that can impact you and your family with a high volume of trash, chemicals, toxins and gases nearby. 1. Study examples confirm nearby landfills negatively impact of home values. The EIS does not state the potential impact on home values or how this would be mitigated. In states like Pennsylvania, for example, the state Department of Environmental Protection is required to consider property value impacts as part of a harms-benefit analysis when making landfill permitting decisions.	Comment acknowledged. The proposed project is a recycling and municipal solid waste transfer station and not a landfill. See the Glossary for an explanation of what a transfer station is. For property values, see Response A-9. Potential air quality impacts are described in Section 3.2.3. For geological hazards, see Response A-52. Potential wildlife and fish impacts are described in Section 3.5.3.

Commenter	Comment/ Response #	Comment	Response
		- Do Landfills Always Depress Nearby Property Values? by Richard C. Ready May, 2005 Rural Development Paper No. 27 (http://aese.psu.edu/nercrd/publications/rdp/rdp27.pdD ABSTRACT All available hedonic pricing estimates of the impact of landfills on nearby property values are assembled, including original estimates for three landfills in Pennsylvania. A metaanalysis shows that landfills that accept high volumes of waste (500 tons per day or more) decrease adjacent residential property values by 12.9%, on average. This impact diminishes with distance at a gradient of 5.9% per mile. Lower-volume landfills decrease adjacent property values by 2.5%, on average, with a gradient of 1.2% per mile. 20-28% of low-volume landfills have no impact at all on nearby property values, while all high-volume landfills - Do Landfills Always Depress Nearby Property Values? by Richard C. Ready May, 2005 Rural Development Paper No. 27 (http://aese.psu.edu/nercrd/publications/rdp/rdp27.pdD ABSTRACT All available hedonic pricing estimates of the impact of landfills on nearby property values are assembled, including original estimates for three landfills in Pennsylvania. A metaanalysis shows that landfills that accept high volumes of waste (500 tons per day or more) decrease adjacent residential property values by 12.9%, on average. This impact diminishes with distance at a gradient of 5.9% per mile. Lower-volume landfills decrease adjacent property values by 2.5%, on average, with a gradient of 1.2% per mile. 20-28% of low-volume landfills have no impact at all on nearby property values, while all high-volume landfills negatively impact nearby values. negatively impact nearby values. - A study from the Pima County (Arizona) Assessor's office shows that a subdivision near a landfill (and all other residential factors being equal, including house size, school quality and residential incomes) loses 6% to I 0% in value compared with a subdivision that isn't near a dump. http://www.pima.gov/Administration/Marana/Impact%20of'/o20the%20Economic%200bsolescence%20Impos ed%20by%20Landfills%20on%20Residential%20Property%20Values.pdf In addition, l am concerned about the following: • Any type of alterations in the hillside during construction would increase the chance of instability/landslides during extreme weather conditions, earthquakes, etc. This is not a risk worth taking. It could put families and homes in danger. • Currently this area has wildlife such as bald eagles and owls that are likely to vacate their homes/resting places with the introduction of a waste facility. • Even if there are measures to mitigate the smell, they will still exist and are extremely unpleasant. A strong breeze would bring rotten garbage smells into our neighborhoods. • Trash attracts vermin exposing our homes to further issues.	For odor, see Response A-57. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. See Response A-121 regarding siting criteria.

Commenter	Comment/ Response #	Comment	Response
		At the open house meeting on March 3rd, I learned that the initial assessment of locations was made in 2011 prior to much of the Vista Pointe construction, including my home. There are now substantially more families who would be impacted by a nearby solid waste transfer station. In fact, if we knew about this prior to purchasing, we would have purchased in another location. The Algona Transfer Station may be out of date, but let's make sure future investments are worthwhile and any new construction won't adversely affect the people it intends to serve. We need you to listen to the voices of our community to remove the location of 35101 West Valley Highway S as an option.	
Li-Diederichs, Laura	**I-35**	Alternative #2 at 35101 West Valley Highway S or any other residential area for that matter should NOT be considered as a location for a new Solid Waste Transfer Station. My husband and I are first time home buyers and when we were considering locations, we chose to live in King County, instead of other nearby counties, because we have seen the quality projects King County has undertaken over the years and believed that officials took seriously their commitment to make choices that benefit the residents they serve. That is why I am appalled by the fact that 35101 West Valley Highway S would be considered as a location for the new Solid Waste Transfer Station. If you purchased a new home and not long after found out that a garbage dump was going to be built in your backyard, I imagine you would do everything in your power to stop it. Why? Because there are a myriad of negative things, health, economic, and otherwise, that can impact you and your family with a high volume of trash, chemicals, toxins and gases nearby. 1. Study examples confirm nearby landfills negatively impact of home values. The EIS does not state the potential impact on home values or how this would be mitigated. In states like Pennsylvania, for example, the state Department of Environmental Protection is required to consider property value impacts as part of a harms-benefit analysis when making landfill permitting decisions. - Do Landfills Always Depress Nearby Property Values? by Richard C. Ready May, 2005 Rural Development Paper No. 27 (http://aese.psu.edu/nercrd/publications/rdp/rdp27.pdD ABSTRACT All available hedonic pricing estimates of the impact of landfills on nearby property values are assembled, including original estimates for three landfills in Pennsylvania. A metaanalysis shows that landfills that accept high volumes of waste (500 tons per day or more) decrease adjacent residential property values by 12.9%, on average. This impact diminishes with distance at a gradient of 5.9% per mile. Lower-volume landfills decrease adjacent property values by 2.5%, on average, with a gradient of 1.2% per mile. 20-28% of low-volume landfills have no impact at all on nearby property values, while all high-volume landfills - Do Landfills Always Depress Nearby Property Values? by Richard C. Ready May, 2005 Rural Development Paper No. 27 (http://aese.psu.edu/nercrd/publications/rdp/rdp27.pdD ABSTRACT All available hedonic pricing estimates of the impact of landfills on nearby property values are assembled, including original estimates for three landfills in Pennsylvania. A metaanalysis shows that landfills that accept high volumes of waste (500 tons per day or more) decrease adjacent residential	Comment acknowledged. See Response I-34.

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		property values by 12.9%, on average. This impact diminishes with distance at a gradient of 5.9% per mile. Lower-volume landfills decrease adjacent property values by 2.5%, on average, with a gradient of 1.2% per mile. 20-28% of low-volume landfills have no impact at all on nearby property values, while all high-volume landfills negatively impact nearby values. negatively impact nearby values. - A study from the Pima County (Arizona) Assessor's office shows that a subdivision near a landfill (and all other residential factors being equal, including house size, school quality and residential incomes) loses 6% to I 0% in value compared with a subdivision that isn't near a dump. http://www.pima.gov/Administration/Marana/Impact%20of'/o20the%20Economic%200bsolescence%20Impos ed%20by%20Landfills%20on%20Residential%20Property%20Values.pdf In addition, l am concerned about the following: • Any type of alterations in the hillside during construction would increase the chance of instability/landslides during extreme weather conditions, earthquakes, etc. This is not a risk worth taking. It could put families and homes in danger. • Currently this area has wildlife such as bald eagles and owls that are likely to vacate their homes/resting places with the introduction of a waste facility. • Even if there are measures to mitigate the smell, they will still exist and are extremely unpleasant. A strong breeze would bring rotten garbage smells into our neighborhoods. • Trash attracts vermin exposing our homes to further issues. At the open house meeting on March 3rd, I learned that the initial assessment of locations was made in 2011 prior to much of the Vista Pointe construction, including my home. There are now substantially more families who would be impacted by a nearby solid waste transfer station. In fact, if we knew about this prior to purchasing, we would have purchased in another location. The Algona Transfer Station may be out of date, but let's make sure future investments are worthwhile and any new construction won't adversely affect the people it intends to serve. We need you to listen to the voices of our community to remove the location of 35101 West Valley Highway S as an option.	
Lundberg, Roland	**I-36**	My name is Roland Lundberg and I am a resident of Vista Pointe community in Auburn. I was made aware that the construction of a recycling and garbage transfer station is being planned at 35101 West Valley Highway South which is within close proximity of my home. I must object in the strongest terms to this project, especially when I learned there is another site available that does not have residential homes nearby at 901 C Street SW. I recently purchased my house for over half a million dollars and now I am told that I might be living next to a garbage facility. This project will not only bring down my home value but will also be a source of continuous frustration. I am also very concerned about the impact on my family's health. I urge you to reconsider placing the plant where no homes are nearby.	Comment acknowledged. For property values, see Response A-9.

Commenter	Comment/ Response #	Comment	Response
Lundberg, Terri	**I-37**	We are vehemently opposed to this Garbage Waste Transfer Station being placed directly in our backyard. Your proposed location 35101 West Valley Highway South is literally directly down the hillside from our brand new half million dollar home, and it is unacceptable, especially considering that the other proposed site at 901 C Street SW has no residential homes nearby. This site not only poses health risks to the children and families in this area, but there is also a risk of damage to our homes. Our home is directly above this proposed site, with a 20-foot setback from a downhill drop into the valley. We are at risk for landslides during design and construction, per your own Key Findings in the Draft Environmental Impact Statement. We are at risk for water contamination, and the noise from a three-year long construction project in our backyard will affect our quality of life. Once this site is completed, it will attract rodents, excessive flies, and scavenger birds, and it will negatively affect our home values. The odor coming up from that valley will make it impossible for us to enjoy our outdoor spaces. This is unacceptable and under no uncertain terms will we let this go without a fight, even if that means pursuing a lawsuit against the County. I (and our community) urge you to place this Garbage Waste Site someplace that is not surrounded by homes. I am 100 percent without a doubt you would not want it located near your home, your family, or your children.	Comment acknowledged. Compatibility with existing land use is described in Section 3.9.3. For property values, see Response A-9. For geological hazards, see Response A-52. Potential water resources impacts are described in Section 3.3.3. For noise, see Response A-108. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For odor, see Response A-57.
Lyndemere, Marie	**I-38**	It is my understanding that selection of a transfer station site for SKC has been narrowed down to 2 locations: one on West Valley and the other on C Street. I further understand that there are actually 2 possible locations on West Valley- one is to remain at the current locale and the other is near by the current location. From a citizen's point of view, either West Valley location is preferable to the C Street location. C Street is a busy commuter lane and currently has daily traffic back ups that would only be made worse if additional transfer truck and general dump disposal/recycle traffic are added to the daily mix. In addition there are several business that would be adversely affected by the C street location. Besides, the last thing that Auburn needs is to add a dump to its already struggling city concept. I know the transfer stations are modern and fancy, but the whole idea of basically putting a dump within a mile of city hall is just a bit much. That city is struggling so to get out of…the dumps. Please Please Please build the new transfer station on West Valley ...	Comment acknowledged.
Malik, David	**I-39**	We need to build the commercial residential 72 room motel and retail commercial on West Valley Hwy.	Comment acknowledged
Marshall, John	**I-40**	I understand there has been yet another meeting on this issue in February. This has been going on for over 3 years which is astounding in itself. In all this time, all your communications have been the same.. you are looking for feedback, but we as the public are no closer to	Comment acknowledged. The preferred alternative is described in Section 1.8.

Commenter	Comment/ Response #	Comment	Response
		knowing what you are thinking. You refer to valley as the preferred option but what does this mean? Why would you prefer a site in a congested area directly beneath a sensitive area that is adjacent to many new higher end homes? This area is best designed for smaller businesses such as the ones currently there. Our neighbor, William McCauley, has reached out to us and the surrounding neighbors and we intend to make our objections heard loud & clear I just want to reiterate what I submitted in December and for the many homes sitting directly above this site. "THIS IS NOT AN OPTION". Plain & simple. 1st, I apologize for the lateness of the feedback but we have been away for an extended period of time. I hope this still counts. We live directly above the West Valley site. (5706 s 348th place) We have just completed construction on a 4200sq ft higher end home. There are also many other new homes in our vicinity. We are obviously very opposed to this option as I'm sure other residents above it are also. We would be subjected to the 7 day /week noise, the smells that come with transfer stations and reduced property values as a result. Would there be compensation for all the residents that would experience reduced property values because of a transfer station right below their homes? From an operational point of view, C Street seems to make much more sense. It is already an industrial area and has much better traffic access from my opinion. Valley Hwy is already congested and will continue to be so. When we were building our home, we were constantly reminded that we are in a "sensitive" area because of the steep drop off and extra steps were taken to minimize impact of water runoff etc. Do you really want to build a multi million$ facility at the bottom of a sensitive area? Summing up, I am for the C Street option	Compatibility with existing land use is described in Section 3.9.3. For noise, see Response A-108. For odor, see Response A-57. For property values, see Response A-9. Potential transportation impacts are described in Section 3.12.3. For geological hazards, see Response A-52.
McCauley, Bill	**I-41**	I belatedly found out about the evaluation of the above location as the site for a new Solid Waste Transfer Station. My neighbor kindly informed me and I was appalled. Why is a location a, couple of hundred feet removed from a growing and improving neighborhood even being considered for the location for a trash dump? The valley has numerous available properties that can be used for this purpose with none of the disastrous neighborhood impacts this location will have. Many valley properties in commercial/industrial areas are available, none which will not have the negative impacts on the lives of	Comment acknowledged. Compatibility with existing land use is described in Section 3.9.3. For property values, see Response A-9.

Commenter	Comment/ Response #	Comment	Response
		local neighborhoods. This thing plopped down on our neighborhood boundary will kill local house values and will certainly degrade incentives for neighborhood improvement. I am a retired person with limited means. I invested my limited wealth in a house in a good, improving neighborhood with an expectation that the value will be stable, so I can one day sell, if I have to, and be able to afford housing that is suitable for an aging person. This project, if it is built, will cause the value of my house fall by 25 or 30% on the day construction begins. The inevitable property devaluation is an unjustifiable burden to put on local home owners. Once again the concerns of citizens who live in the valley neighborhoods of South King County (Auburn, Pacific, Algona, Jovita) are regarded as unimportant compared to the concerns of citizens in more upscale or prosperous neighborhoods. Mr. Creegan, would you like to swap the West Valley Highway location for a location about a block from your house? That's about how far this thing will be from my house. Or how about putting this garbage dump over on the West side of l-5, in Federal Way, by the Commons Mall? I'm guessing I already know the answer. A few years ago our King County public servants tried to put a half-way house for sexual offenders in the woods about a half-mile south of my house. Why, when the offenders come from Seattle? We know the answer to that question, don't we? The West Valley Highway location should be removed from the list of possible sites. It should not even be considered. Stay out of all neighborhoods. Find a location in a commercial/industrial area without homes.	
McCleaskey, Jim	**I-42**	I moved from San Diego CA to this brand new neighborhood in early 2015, and specifically chose it for the location (a quiet cul-de-sac on a hill) and view. I was only recently made aware of its proximity to a considered recycling station. I take umbrage with the idea that this location is somehow acceptable against a backdrop of community growth and improvement. I cannot sit idly by and allow the foul and unsightly pollution of the noise, odor, pests, and property devaluation that come with your project. I plan to attend the March 3 evening meeting to ensure these and other community concerns are addressed and reasonably considered. Please take the necessary steps to reevaluate the Recycling Station and move further away from residential areas into an industrial area. Find another location, there are many.	Comment acknowledged. See Response A-121 regarding siting criteria. For noise, see Response A-108. For odor, see Response A-57. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For property values, see Response A-9. Compatibility with existing land uses are described in Section 3.9.3.
McCulloch, Al	**I-43**	I would support the no action or alternative #2. Keeping the site along west valley highway, relating traffic and ease of accesses makes the most sense to me. The C street alternative would be a traffic nightmare in my eyes.	Comment acknowledged.

Commenter	Comment/ Response #	Comment	Response
Molvik, David	**I-44**	Please add my name to the list of electronic updates for the new King County Transfer Station in Algona or Auburn.	Comment acknowledged.
Moore, Abe & Barbara	**I-45**	As long time residents of Auburn (35 plus years), we are very interested in the location of any new recycle and transfer station which would impact our community. Suffice it to say, we fully support Alternative 2 - 35101 West Valley Highway South, Algona. This is the only option we support.	Comment acknowledged.
Nelson, Michelle	**I-46**	I am truly concerned about the putting the new transfer station at the preferred site #2. It is extremely close to residential neighborhoods. The smell, traffic, and sounds would all negatively affect the lives of many people. The other alternative, however does not appear to be as close to residential areas. Also, why would we put a recycling/transfer station so close to a critical habitat area for animals? This makes no sense! Please reconsider this proposal!	Comment acknowledged. For odor, see Response A-57. Potential transportation impacts are described in Section 3.12.3. For noise, see Response A-108. Compatibility with existing land uses are described in Section 3.9.3. Potential wildlife and fish impacts are described in Section 3.5.3.
Nelson, Eric	**I-47**	In am writing in opposition to the proposed transfer station on West Valley Highway. With the assumption that you have already received numerous emails and letters from citizens incredulous of your failure to appreciate that the site is directly below a neighborhood, I will focus instead on the concern about transportation. WSDOT has construction currently underway on SR 167 in the area of SR 18. The end result of this project is to "provide congestion relief for commuters and freight carriers, improve safety, and provide commuter options." Your proposal creates the opposite effect on the area in ways I have not heard you address. The intersection of SR 167 and SR 18 is unique in the region in that commuters must completely exit a major highway system prior to transitioning onto a second highway. Drivers eastbound on SR 18 must exit onto West Valley Highway prior to joining southbound SR 167. Likewise, northbound SR 167 drivers must also negotiate four stoplights on the side road of West Valley Highway prior to joining westbound SR 18. This area of West Valley Highway has become a critical "chokepoint" for traffic. The capacity of the new transfer station is a significant increase over the one in existence. To make the situation worse, the ability to recycle (currently not available) will bring additional traffic. The congestion from Peasley Canyon and the two miles of West Valley Highway near SR 18 have already been identified as a regional traffic concern.	Comment acknowledged. Potential transportation impacts are described in Section 3.12.3.

Commenter	Comment/ Response #	Comment	Response
		The State of Washington is spending $81,924,000 from the 2005 Gas Tax to address the traffic on SR 167 with three stated benefits - safety, congestion relief, and environmental. Mr. Creegan, I don't believe it was the goal of the State or W5DOT to extend the HOT lane or improve on-ramps and off-ramps in order to see exiting cars backing up onto the highways (already occurring), all because you chose the one area in the region where the transition between two critical highways requires a side road. The same side road, already exceeding surge capability that is the primary route to your project. Having recycling capability is a new demographic that greatly outweighs any benefit of "compaction." An informal flow study of other local transfer stations shows 30 to 80 vehicles for recycling alone per hour. West Valley Highway at Peasley Canyon already has major traffic issues. West Valley is the transition road between SR 18 and SR 167. Locating the new transfer station on the same road will create gridlock at already busy lights. Repaving the highway or straightening the road will not alleviate this critical issue.	
Nguyen, AnhThu	**I-48**	I'm currently resided at 5622 S 337th St Auburn WA. I recently found out about this project and strongly object the preferred alternative site for a new waste station location. The smells, noise and vermin will affect our whole neighborhood.	Comment acknowledged. For odor, see Response A-57. For noise, see Response A-108. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code.
Nufer, Philip & Jessica	**I-49**	My name is Philip Nufer. My wife and I bought new construction Mainvue home about 1.5 years ago. Because the home was located in a nice neighborhood, on a hill, with a view of Mount Rainier, we paid a major premium for the city of Auburn. I had no idea a dump site proposal was even in the works. One of my neighbors recently informed me, and I am very upset. Our home is located on West Hill directly above your proposed dump site. If had known or even heard a potential rumor that a dump site was being built near the home, I would have never made the purchased. Because the property prices in this neighbor are significantly higher (500-600K) than that of the surrounding area (150-300K), a dump site just below these new homes would have a significant impact on the neighborhood property values. The odor, rodents, noise, and the idea of living anywhere near a dump would be undesirable for any prospective home buyers. In addition, our home was built right on the edge of the hillside. I am concerned with the integrity of the hill if a dump is craved out just beneath us.	For property values, see Response A-9. For odor, see Response A-57. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For noise, see Response A-108. For geological hazards, see Response A-52. Compatibility with existing land uses are described in Section 3.9.3.

Commenter	Comment/ Response #	Comment	Response
		Auburn is not known for having nice neighborhoods, good schools, and a desirable place to raise families. However, I honestly believed these new homes were a very good start to rebranding and rebuilding the image of Auburn/Federal Way. Building a dump site next to one of the few clean and thriving Auburn neighborhoods would remove any chance of this city being seen as a desirable place to live. Please consider removing the West Valley Highway location from your dump site options. I believe a warehouse or industrial area is a significantly better option.	
Nunogawa, Sunshine	**I-50**	I understand you are the project director for the new garbage dump in Auburn. We live in the Main Vue Vista Pointe neighborhood up the hill from the proposed site and are writing in opposition to the proposed location. We feel it would be an eyesore, cause unfair odors on our property, and would be detrimental to our property values directly up the hill. Please strongly consider any other location.	Potential visual quality impacts are described in Section 3.10.3. For odor, see Response A-57. For property values, see Response A-9.
Pak, Chun	**I-51**	I am against having the Recycling & Transfer Station in my neighborhood.	Comment acknowledged
Pelayo, Gustavo & Rosalina	**I-52**	I shockingly just found out about the location of the proposed new solid waste station. How I was unaware of the proposal I have no idea. Especially since it's just below a brand new residential community called Vista Pointe, where we just recently purchased a brand new $500 thousand house which as you can imagine we would not have purchased had we known such a big waste transfer station would be right below us. I hope you take into consideration the closeness of the station and the effects and consequences it will have being so close to a residential community including noise, air pollution, smell, vermin infestation, hill damage, decreased property values and the obvious loss of residents who won't want to buy, sell or live next to a Waste Transfer Station. Thank You for your time and once again please take our concerns seriously as we don't think a residential community should be next to a Waste Station, and hope the West Valley Highway location be removed from the list of possible sites.	For noise, see Response A-108. For odor, see Response A-57. For geological hazards, see Response A-52. For property values, see Response A-9. Compatibility with existing land uses are described in Section 3.9.3.
Perth, Brent Williams	**I-53**	Vista Point is a new neighborhood that has added $61 million to the tax rolls, bringing over $1 mil in tax revenue, the preferred location is in an area that will bring the smell from the up draft of wind directly into the neighborhood. Regardless of wind direction – the wind always comes up and into the neighborhood at night. Plus there is already land slippage happening in the green space on the line between Auburn and Algona. We need a stakeholder group with a representative from the bluff that will work to ensure that water run off, erosion from the hill and smell does not impact these brand new homes.	For odor, see Response A-57. For geological hazards, see Response A-52.
Pyon, Muho	**I-54**	I oppose the development of the Recycling & Transfer Station in Algona. It is inconsiderate to the residents that such station would be constructed close to the residential area. When we were considering to move to MainVue Homes in Auburn few years ago, the transfer site that already exists in Algona was the main issue that hindered us from making a quick decision. It is not only unattractive to have close to houses, it causes a lot of problems that would affect the quality of living including bad smell, mice	For odor, see Response A-57. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry

Commenter	Comment/ Response #	Comment	Response
		problems, bad air quality, possible exposure to hazardous waste, etc. Traffic is another problem. Highway 167 is already causing a lot of traffic, and West Valley Highway is an option to get around. Expanding it to more than four times its size in a location where many people commute daily, I would assume it would create more traffic on both roads. It will be a lot of headache and inconvenience for anyone who commutes through Algona. I believe the Transfer Station should be in a more remote place from where people reside. Another issue with the Algona location is the safety. There are houses up on the hill, and I'm concerned about the possible collapse of the houses due to the instability of the hillside during/after the construction. I'm wondering if the city will take the responsibility for those houses if that ever happens. I'm wondering if the city will take the responsibility for the decreased house values due to the construction. I understand that it's necessary to build a more efficient Transfer Station, and I know it will benefit a lot of us in the future. I hope the city makes a wise decision about where to build the site, not based on budget, but based on consideration to the residents and the commuters.	standard practices as required by the WAC and King County Code. Potential air quality impacts are described in Section 3.2.3. Potential hazardous materials impacts are described in Section 3.8.3. Discussion of transportation impacts is expanded in section 3.12.3 to include percent increase at key intersections or corridors. For geological hazards, see Response A-52. For property values, see Response A-9.
Ritchie, Lyn	**I-55**	Algona has been guest to the transfer station for many years. The new Algona site is not suitable because of hillside and water running through property. Auburn is a flat site with rail access. Improving West Valley Hwy to the extent it would be necessary would turn it into a mini - 167. Speeds would increase as well as volume. Current businesses north of the location would be hurt by the difficulty in accessing their locations. Property values of neighbors would be impacted. Algona will permanently lose the opportunity to turn that property into a tax generating site. Utilities (power & phone & sewer) are currently inadequate along this stretch of roadway. Power and phone outages are common as well as surges. What provisions are being made to improve the utilities from 15th SW to South Algona city limits.	For geological hazards, see Response A-52. Potential water resources impacts are described in Section 3.3.3. Potential transportation impacts are described in Section 3.12.3. Compatibility with existing land uses are described in Section 3.9.3. For property values, see Response A-9. See Response A-9 concerning socioeconomics. Potential public services and utilities impacts are described in Section 3.13.2.
Rockwell, John	**I-56**	I received via surface mail a brochure dated 02.04.16 outlining proposed sites for the new South King County Recycling and Transfer Station. Thank you for providing the information and requesting public input.	Comment acknowledged. Rail access was not a consideration in evaluating the Action Alternatives.

Commenter	Comment/ Response #	Comment	Response
		Having walked the proposed sites and visually inspected each, I recommend Alternative 1, located at 901 C St. SW, Auburn. My reasons for this recommendation are as follows: 1. **Rail Access** - Over the life of the proposed transfer station, use of rail to remove solid waste is environmentally friendly compared to trucks. Spurs could be constructed to BNSF RR or UP RR: both railroads are nearby. 2. **Reduced road damage and traffic congestion** - Trucks removing waste from the site, as compared to via rail on a restored spur or spurs, would damage roads quickly and increase traffic congestion (1 railcar = 2 trucks). **Cost/Negotiated pricing** - Bids could be competitively submitted to both railroads to better control costs	
S, J	**I-57**	My observation of large weeds growing of up to almost six to seven feet. With large pollens from nettles plus others are almost dangerous to swallow – it prevents people to enjoy the outdoors during the summer season. Proper planting of the right trees and plants can reduce hill slides. Just my observation.	Comment acknowledged.
Sallee, Cheryl	**I-58**	I was aware of the proposed project, but until I saw the map today did not realize how it would impact our neighborhood above the proposed West Valley Highway site. I live on 55th Ave S about 1 block off the bluff directly above the proposed site. I cannot imagine the impact this would have on our neighborhood - Odors? Noise? Property Values? How many such facilities are built essentially adjacent to new housing developments with the potential for even more large homes on view lots or even near older neighborhoods? Are we "south enders" once again being considered "low class" so you can do anything you want in our neighborhoods? You can bet a transfer station wouldn't be proposed below east side view homes. Some of the one hundred-thirty plus new homes that were just built or are being built in the Jovita Heights development and another proposed 80 homes just south of us are half million dollar homes. Again, what will this do to our property values and our quality of life? I think about the transfer stations I drive by on 1-5 and near the 1st Ave S bridge. They are not in neighborhoods. Why is a neighborhood being considered? I am sure officials say there are no houses adjacent to the proposed site, but housing directly above the site IS adjacent to the site. Please add these comments to your list of public concerns and respond to the questions above. I do plan to attend the March 3 meeting but if for some reason I cannot attend I wish to have my concerns considered.	For odor, see Response A-57. For noise, see Response A-108. For property values, see Response A-9. Compatibility with existing land use is described in Section 3.9.3.
Sankaranarayanan, Murali	**I-59**	I am aware of the proposed project and its proximity to our young neighborhood is extremely disconcerting. We live on 56th PL S about 2 blocks off the bluff directly above the proposed site. I cannot fathom the impact this would have on our neighborhood such as property value, odors, noise?. I would like to know how many such facilities have been built adjacent to new housing developments along with the potential of larger homes on lots with view or even near older neighborhoods? Some of the one	For property values, see Response A-9. For odor, see Response A-57. For noise, see Response A-108.

Commenter	Comment/ Response #	Comment	Response
		hundred thirty plus new homes that were just built or in the process of being built in the jovita heights development and another proposed 80 homes just south of us are half million dollar homes. What will this do to our property values and our quality of life? Are we being taken for granted as this wouldn't happen in east side view homes (Bellevue etc.). I drive on 1-5 every day and the transfer station I see there is not in or near any neighborhood. Why is this transfer station proposed near a vibrant neighborhood? I am sure officials would say that there are no houses adjacent to the proposed site but housing directly above the site is adjacent to the proposed site isn't it? The proposed location should be removed from the list of possible sites and should not even be considered. Please stay out of our neighborhoods and find a location in a commercial or industrial areas without homes.	Compatibility with existing land use is described in Section 3.9.3.
Shelmadine, Lori	**I-60**	I would like to first start out by saying that I am outraged that I just found out about this project not only as a new buyer of my home, (in which I was not informed that this project was in progress and for the record it will be directly below my backyard, for our property line goes down to the proposed new site for the South County Recycling and Transfer Station) but neither my husband nor myself were properly informed that there was going to be a "Public Open House", which was held in the Auburn High School on February 22, 2016. I did not receive any mailings, calls, or e-mail notification that this meeting was going to take place on February 22, 2016. We found out Sunday evening, approximately 4:00 pm from a gentleman who was walking the neighborhood and informing our neighborhood of this meeting and the preferred site in which the county has chosen. If it were not for this gentleman we would not have known about this meeting or the project. First of all I bought my home in 2013 and if I knew about this project and the "preferred" site being basically in my backyard, I would not have even considered this property. We bought this property because it was out of the city, had 1.5 acres, and the best part was our view of the valley and the mountain's and it's very peaceful and quiet here and thus these are a few reasons why we fell in love with this location. This house and this neighborhood was also an investment for us and in fact, our home was recently reassessed by King County and my taxes have increased by $300.00, secondary to the value of my home has increased by 67,000 per the county. Now with this proposed site the value of my home will decrease by 25-30% of its value, my peaceful/quiet backyard will no longer be peaceful/quiet and I will be exposed to many toxins, rodents, noise, and smells in which I do not want to be exposed to. By building this transfer station in the "preferred location", it will devalue not only my property but my neighbor's property thus putting an unjust burden onto the local home owners in this area. In addition to having the property values decline, we gain toxins rising from the dump, noise from the trucks, rodents migrating from below to above in our backyards, houses, and garages in which I am not pleased about and as stated above, if I was made aware of this project and how it would affect me and	Public involvement and consultation is described in Section 1.6. For property values, see Response A-9. Potential hazardous materials impacts are described in Section 3.8.3. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For noise, see Response A-108. For odor, see Response A-57. For geological hazards, see Response A-52. Compatibility with existing land use is described in Section 3.9.3.

Commenter	Comment/ Response #	Comment	Response
		my family, we would have looked for another property and not purchased this home. I am also not confident that the hillside is really stable or suitable to be cut into for this or any project in the future. In fact, I would gander, based on the mud slides that occur in this area, there would have to be further, and a more in depth surveying of the hill and possible extensive reworking of this hill to really make it stable, so there would not be any sliding for I would not want my backyard ending up in the transfer station as a result of a bad rain storm. I feel that the other proposed site, as I was told was in an area that was already and area that was already set up with industrial businesses. I do not understand why the county would even consider putting the dump next to any neighborhood especially below homes with a view, (in which we paid a price for) when there are other suitable sites for this transfer station. While we were attending the Public Open House, I was accompanied by my husband and our state representative, Mark Hargrove, in which all three of us had a lot of questions for the presenters, in which some questions were answered and other questions went unanswered. Mr. Hargrove was also not in favor of this "preferred site", and had asked that we (my husband and I) keep him personally informed, in which well do. I suspect if this project does go forward there will be a lawsuit filed by the people who will be directly affected by this project if it is built in the "preferred site". I personally would hate to see this happen especially when there are other options. I do know that if we were living in Kirkland, Bellevue, Queen Anne, we would not be having this conversation, for this type of project would not even be considered to be backed up to any homes in these neighborhood so why should it even be considered an option for our neighborhood; again there are other options available. Also, if there are any upcoming meetings, I really would like to be informed in a timely manner and will provide you several ways to have you or your staff contact me so both my husband and I can attend.	
Shim, Jae	**I-61**	This is Jae from the home owner in Vista Pointe of Auburn. I heard about the information that the County are planning to construct a new Garbage Dump Station near to the old one. New one would be installed to the north bound of the old one if it is decided to do. As you know, there are a lot of houses next to the new station. Home number is over 1,000. This new dump station will make a lot of problems if it is constructed near to the environment of residential area. The problems are such as gases, truck traffic, living rats, making instability of hillside in the vicinity of the new dump station. Especially the instability is directly related to the safety of people who live on the hill. Gases and Rats are also critically affecting, actually deteriorating the healthy environments of people not enhancing the living environments. I think you the county is responsible for the health life of people who lives in South King County. So please reconsider the concentration of new dump station.	Potential air quality impacts are described in Section 3.2.3 Potential transportation impacts are described in Section 3.12.3. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For geological hazards, see Response A-52.

Commenter	Comment/ Response #	Comment	Response
Skahill, Paul	**I-62**	I attended the meeting last Thursday night for the new Algona Transfer Station. I did see the two proposed sites. I was told that the Alternate 2 site was the most favorable. Why would King County even consider building a garbage dump directly below an upscale neighborhood with beautiful homes? Not to mention there are more new homes being built. I've lived in the area for 23 years. I have seen the neighborhood evolve into a nice community. I am offset a couple of blocks from the bluff in between 55th and 56th streets. Although I am not a stones throw away and in plain sight of the garbage dump like a lot of the residences would be, I am concerned about the noise pollution as well as the smell of a dump directly below. If I am out enjoying a cup of coffee in the morning on a hot summers day and I can smell any trash whatsoever I am not going to be happy. I am concerned about my property value as well as resale value. I would be willing to bet a lot of potential buyers would bypass my home if they knew a garbage dump was directly below. Please consider building the new transfer station in a more suitable location away from neighborhoods.	Compatibility with existing land use is described in Section 3.9.3. For noise, see Response A-108. For odor, see Response A-57. For property values, see Response A-9.
Snipes, Sonya	**I-63**	I am a resident of the Vista Pointe community and I find the proposal put forth by King County Solid Waste, to site a new transfer station in a commercial zone adjacent to a large community of homes and families highly objectionable. The health and environmental hazards associated with a facility of this type include but are not limited to odor, noise, dust, vibration, vermin, vectors, and general pestilence all of which represent highly objectionable impacts to people, especially children and cannot be understated. From research, I have learned that most of the other sites that have been considered for this project were much further away from large communities so I cannot understand how it is possible for a proposal that would place the facility closer to homes than any of the other proposals has gained merit. This community should not be forced to bear the burden of yet another facility of this type in close proximity. The odor, dust, vibration and noise associated with this type of facility by nature categorize it as a facility that is ideally suited for an industrial zone away from homes and families that would be otherwise subjected to the long term health impacts associated with unknown dusts etc. Please consider the people living in this community and site this facility in an industrial zone!	Potential hazardous materials impacts are described in Section 3.8.3. For odor, see Response A-57. For noise, see Response A-108. Potential air quality impacts are described in Section 3.2.3. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. Compatibility with existing land use is described in Section 3.9.3.
Tucker, Shirley	**I-64**	Oral comment: SHIRLEY TUCKER: My name is Shirley Tucker. I live right across the street from the recycling place, and before that it really smelled terrible, and some reason it's not smelling anymore. It's like grass. You know, they had grass there. And we don't want no -- we don't want no -- what am I trying to say -- garbage and stuff. anymore over there. Don't make it bigger. How would you like to live across the street from something like that? I live right across the street on Algona Boulevard. I mean, I can see it from my house. And it was there when I moved -- when I built there, so but I -- like I said, it got smelly, and I went down to the city and they fixed it. But boy, if they have more there, there's not going to be anything to be fixed. And I pay $4600 taxes on my place. So what are they doing with that money? I do. I've got the proof. That's a lot of money.	For odor, see Response A-57.

Commenter	Comment/ Response #	Comment	Response
Weir, Richard	**I-65**	I have reviewed the draft EIS and find the probable damage to my property value by locating the new RTS at Alternative 2 (Algona) to be completely unacceptable. I live at 34912 57th Ave S - quite literally the adjacent property. In preparation, I have consulted with the law offices of Russo and Graham who assure.me that damages to my property value as well as reduction in "quality of life" are recoverable. I have not spoken with every neighbor along the valley rim, but those I have spoken with would enthusiastically join in a class action lawsuit. Alternative 1 (Auburn) is far better located relative to the impact of residential property. We are more than ready to defend our properties. Years ago King County tried to locate a sex-offender transitional housing project in the same general area. We banded together, fought the county, and won. We've done it before and if necessary we will do it again.	For property values, see Response A-9.
Young, Suk	**I-66**	As a residential owner located right above the proposed site, I strongly oppose the transfer station. We are senior citizens with various health issues, and are concerned about noise, odor, traffic and water issues which will impact our health and life. Proposing a garbage dump right in the middle of a newly built residential area is a terrible idea. We strongly oppose this inconsiderate plan.	For noise, see Response A-108. For odor, see Response A-57. Potential transportation impacts are described in Section 3.12.3. Potential water resources impacts are described in Section 3.3.3.
Young, Ken & Vanessa	**I-67**	My husband and I are strongly against the building of a New Transfer Station in the proposed Algona West Valley Transfer Site. We currently live in the Vista Point Neighborhood, which is closely located to this Algona Site and close enough to cause great concern for my neighborhood's property values as well as future odor & environmental concerns. Our neighborhood is only 3 years old and overlooks this site location. Given the value of our neighborhood's homes and potential for property depreciation due to close proximity to a transfer site could mean a huge tax loss for the city & county from lower property taxes. We would like the Algona West Valley Transfer Site removed from the prospective list and support the 901 C St. SW location, which is not near any housing developments. I have signed our neighborhood petition against the West Valley Site and hope that this huge outcry from tax paying Auburn City Residence have made our voices heard.	For property values, see Response A-9. For odor, see Response A-57. Compatibility with existing land uses are described in Section 3.9.3.
Yu, Jessica	**I-68**	I would like to make some comments regarding the new South County recycling and transfer station site selection, but cannot seem to find a comment page on SEPA website. Can you please provide a link where I can leave my comments? As a home owner just East of the current transfer station in Auburn, I strongly oppose the potential site (North	For odor, see Response A-57. Contact information for the SEPA Lead Agency and Responsible Official was listed on the Fact Sheet of the DEIS for public comment.

Commenter	Comment/ Response #	Comment	Response
		of the current transfer station) due to the following reasons: bad smell, traffic on West Valley road, vermin, instability of the hillside, possibility of hazardous waste exposure and property value hit. The zonings around this site is mostly residential opposed to the other potential site near the collection outlet mall, which is mostly commercial. It makes a lot of sense to choose a site near the collection outlet mall based on current zonings next to each site.	Potential transportation impacts are described in Section 3.12.3. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For geological hazards, see Response A-52. Potential hazardous materials impacts are described in Section 3.8.3. For property values, see Response A-9. Compatibility with existing land uses are described in Section 3.9.3.
Yuchimiuk, Sergy	**I-69**	Yesterday I heard of the horrible plan to put a waste transfer station in my backyard. How is it possible that this is even being considered? My wife and I have been saving every penny to buy our first home for many years now. About two years ago we started looking for a house for us and our two children 3 and 7 years old to call a home. We came upon a beautiful piece of property at 35014 57th Ave S Auburn, WA 98001. We are young and just starting our family life and were looking for a place that we can call home for a very long time. We quickly met great neighbors all around us and were welcomed into the community. Over the past year I have spent countless hours of blood, sweat, tears and our entire savings into the inside of our home to make it a perfect place for my family and my kids to enjoy for many years to come. My kids love nothing more than to run around outside and bounce on the trampoline, when evening comes around we love to sit on our swing and gaze at the gorgeous view and count the stars. We have many plans for a tree swing. Maybe even a tree house. A big garden and many other little projects to enjoy the beautiful piece of property we call our home. I really don't think it's even necessary to tell you about the impact that putting a huge 24 hour waste transfer station in my backyard would have but I will anyways. Let me ask you, would you want a transfer station this close to your yard? Would you let your kids go play outside? Can you even imagine the smell that will travel up the hill? You know those peaceful evenings of star gazing my kids do. Will they now be replaced with listening to garbage trucks 24 hrs a day? I'm sure you know perfectly well that garbage brings pests, pests like rats and flys that will live in my hillside and bring sickness and disease with them.	Facility operating hours would be limited; it would not be operational 24 hours/day. For odor, see Response A-57. For noise, see Response A-108. Vector wildlife would be controlled in a manner prescribed by transfer station operating plans and industry standard practices as required by the WAC and King County Code. For geological hazards, see Response A-52. Potential vegetation impacts are described in Section 3.4.3.1. For property values, see Response A-9.

Commenter	Comment/ Response #	Comment	Response
		Just recently a slide happened about a mile down on west valley. You know how unstable this hillside can be. So do we, so when we looked to purchase we highly considered the risk and felt a small amount of peace knowing that the property is untouched and has natural vegetation with a lot of trees on the hillside that have deep roots. Now you want to go and dig into that same exact hill and take away any sense of peace that we felt? I think most of all is the impact on the value of my property. I spoke to a few friends who are local real estate agents and have been told that I should expect a 25% decrease in property value immediately! Mr Creegan, I don't know if you could afford a 25% value decrease on your home but I cannot. We have done nothing but invest our time and money into a place with a hope of sweat equity. Do not take that away from us. This is not the location for this transfer station. My story is only one of the dozens of lives this will impact. Something of this magnitude needs to be built in an area that is not this close to private homes. It belongs in a commercial district. Please remove this location from even being considered, it is not right and not fair to the community.	
Zimmerman, Richard & Melinda	**I-70**	This is Richard Zimmerman and my wife and I live just up the hill from one of the proposed locations of the replacement Algona Transfer Station. I'm writing to voice my opinion that the preferred site would have a big negative impact on our neighborhood. I don't think this neighborhood was thought of much when this became the preferred site. Houses and transfer stations don't mix well. It seems to me there would be a much smaller neighborhood impact with the other location. It's surrounded primarily by other industrial building and the transfer station would fit in much better. There are many view homes that would have the new transfer station in their view. With the current location I don't believe there are any houses just above it so it's not as noticeable. With the preferred location there are a lot of homes that would have a direct line of sight to this facility. With the other location we could still see the station but it's far enough away it would look like any of the other building in the area. I can't help but believe this would have negative impact on the value of our homes. It doesn't attract lots of people to an area close to a transfer station. We all know that are necessary and have to be located by something, but it seems to me the more industrial the area the less negative impact. The preferred site appears to me to have many more construction problems than the other site. Much of this preferred site is wetlands and there is a creek running through the area that must be dealt with. The other site has a small wetlands area that isolated to one corner of the property. It seems to me this would cut the construction costs down. The preferred site is also at the base of a very steep hill. Once again this appears to me to add to the cost of construction as there has to be hillside retainment issues dealt with. The other site is all flat and easy to construct on.	Compatibility with existing land uses are described in Section 3.9.3. Potential visual quality impacts are described in Section 3.10.3. For property values, see Response A-9. Potential water resources and wetland impacts are described in Sections 3.3.3 and 3.4.3. For geological hazards, see Response A-52. For odor, see Response A-57. Potential air quality impacts are described in Section 3.2.3. The preferred alternative is described in Section 1.8.

Commenter	Comment/ Response #	Comment	Response
		Being the preferred site is near houses I can't help but believe there will be a smell and dust issue. The current location provides smells to us on certain days when the wind is right. With this new location it seems like we'd get more of that since it will new be just a stones through away from these houses. I understand this new facility will have improved smell and dust containment but none of this is perfect so once again why put this close to houses? I reading through the online material I wasn't able to find the documents that explained why the preferred site was picked as that. That would be helpful to understand what the thinking is. I'm sorry if that information has been provided and I missed it. Please consider removing the preferred site from the list for the new transfer station.	
Anonymous	**I-71**	I would like the new station go to Auburn it would be nice if traffic on W. Valley would let up.	Comment acknowledged.
Anonymous	**I-72**	How can you prefer a site with running water on it over a site already flat and accessible. What about the hillside – it is unstable. You have houses above the site in Algona! You have a stream in Algona. There is wildlife in Algona.	For alternatives, see Response A-7. For geological hazards, see Response A-52.
Citizen petition	**I-73**	Attached are four pdf files of citizen petitions opposing the proposed siting of a new solid waste transfer station at 35101 West Valley Highway, Algona. Our community organization collected these signatures on Sunday in the community, to organize opposition to the siting. We will continue with this effort in coming weeks until we talk to everyone we can find in the Jovita Heights and the Algona communities, as well as local businesses. In our conversations with neighbors and business people we found uniform enthusiasm for the opposition arguments and uniform opposition to the proposed siting on West Valley Highway. The site at 35101 West Valley Highway South, Algona (known as the Preferred Alternative Site), is unsuitable for the location of a new garbage transfer station, for several reasons. We believe: • Home Values Will Decline. The location on West Valley Highway has rapidly developing residential areas on its western boundary, with established residential area to east the and southeast, with many hundreds of homes; and a growing retail area immediately to the east. • A Garbage Transfer Facility is Inappropriate in or Near Residential Neighborhoods. Many other locations are available in South King County, which will not impact already existing residential areas. Those locations are better choices, even if facility users have to drive farther. • Nasty Smells Will Permeate the Neighborhoods. The effusions vented up the hillside will carry noxious smells into neighborhoods. • New Facility will be too large for Local Infrastructure to support. Major road construction will be necessary and costly, with negative impact on an already congested area. • Roadside Garbage will be a Problem. This is already a problem in the area because of the current garbage transfer facility. The larger volume expected in the proposed site will produce even more, which local governments will have to pay for. • Environmental Impact will be Negative. Environmental remediation has been ongoing in the Peasley Canyon area and in the green belt extending along the bluff where the new garbage	For property values, see Response A-9. Compatibility with existing land uses are described in Section 3.9.3. For odor, see Response A-57. Potential transportation impacts are described in Section 3.12.3. Common elements of operation are described in Section 2.2.3. Potential hazardous materials impacts are described in Section 3.8.3. For geological hazards, see Response A-52.

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		collection station is proposed. Locating a large garbage collection facility near this environmentally sensitive area will have a negative impact. • Geological Hazard Will Increase. Steep hillsides in the entire King County area are typically unstable in the rainy season, and that is true for this area. Building a facility this size will very likely make unstable hillsides even more unstable. • Inappropriate Land Use. The environmental and geological sensitivity of the land at the site makes this land much more suitable for low impact use, such as small commercial or small manufacturing. • The EIS will be Completed Much Too Late for Thorough Public Comment or Rebuttal. For these reasons we respectfully insist that the location at 35101 West Valley Highway South, Algona, be removed from the list of possible sites for the new garbage collection facility.	