

## St. Edward State Park Ballfield Improvements (VAR17-0120)

### SEPA Public Comments and City of Kenmore Responses

Comment period: September 11, 2017 to September 25, 2017. Comments are consolidated by topic and are responded to below.

Comment Number	Comment	Commenter Last Name(s)	Response	Reference Document
<b>General</b>				
G-1	General: Commenter completed notice to receive copy of decision.	Hough 9/13/17 Majumdeev 9/14/17	The Development Services Department creates a Party of Record list of individuals who will receive a copy of the Notice of Decision	N/A
G-2	General: Clarify if an MDNS has been issued.	Aagaard 9/19/17 Finn 9/20/17	Development Services response 9/20/17: An MDNS has not been issued for the project.	N/A
G-3	General: Clarify the SEPA notice process, length of comment period, anticipated mitigations, appeal period.	Aagaard 9/19/17	Development Services response 8/20/17: If an MDNS is issued, a 14-day comment period will follow issuance and the appeal period will be 14 days after issuance.  Mitigation measures will be described in the City's findings and SEPA determination. Applicant-proposed mitigation measures are found in the critical areas report and SEPA checklist.	N/A
G-4	General: Commenter had no comments after review. Who is the contact for events?	Balisky (King County DNRP) 9/21/17	Specific contact for events is undecided at this time. The City of Kenmore would handle field scheduling.	N/A
G-5	General: Who decides on the variance?	Prince 9/25/17	The Director of the City of Kenmore Development Services Department decides on the variance.	N/A
G-6	General: Refer to comments submitted for the variance	Aagaard 9/25/17 Carlson 9/25/17 Finn 9/25/17 Prince 9/25/17	Refer to Section O-1 below.	

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<b>Opposition</b>				
O-1	Opposition: Does not meet all six variance criteria; SEPA is moot given inability to meet variance criteria..	Aagaard 9/25/17 Finn 9/25/2017	<p><b>1. There are special circumstances applicable to the subject property or to the intended use such as shape, topography, location or surroundings that do not apply generally to other properties and which support the granting of a variance from the buffer width requirements; and</b></p> <p>The special circumstance is that the existing active recreation ballfield is a contributing factor to the St. Edward Seminary Historic District and is also currently located in a wetland and its buffer. The existing ballfield location reflects the District’s original site plan as described in the Cultural Landscape Inventory (CLI). The Inventory describes the “full development of the east side of the seminary building for recreational uses” (CLI, p. 43), including the field, ball courts and the gym. Recreational spaces were, in fact, emphasized in the St. Edward Seminary Historic District landscape (CLI, p. 11). The Inventory states that Washington State Parks should “continue use of historic sports field for active recreation” (CLI, p. 163). For these reasons, the active sports field must remain in its current location on the “football field terrace” of the Historic District (CLI, p. 37). Relocating the existing ballfield out of this area is not possible without adversely impacting the District’s historic designation.</p> <p>Given that the existing wetland and its buffer extend across nearly one-third of the existing mown grass sports field and that fields for active sports have certain dimensional requirements, keeping active fields on the terrace is impossible without some impact to the wetland buffer. The proposal has shifted the renovated fields as far to the west</p>	<p>Variance Justification Memo</p> <p>Revised SEPA checklist</p> <p>2006 Cultural Landscape Inventory</p> <p>Memorandum of Understanding Contract 16-C1507</p> <p>Comparison of Synthetic turf vs natural turf (Bruce Dees &amp; Associates 2016)</p> <p>January 2018 Revised Critical Area Report and Draft Mitigation Plan</p> <p>Draft Stormwater Technical Information Report (Pertee 2017)</p>

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			<p>as possible, moving them outside of the wetland while avoiding impacts to the existing large trees to the west of the field, along the entry drive (another contributing factor to the District, CLI, p. 76 and p. 120). This still results in some continuing impact to the wetland buffer. The desire to retain the historic integrity of the sports field terrace and the resulting inability to relocate the sports field from its present location to a location entirely outside of the critical area buffer is the “special circumstance” that must be balanced with the need to conform to present day critical area regulations as much as possible.</p> <p><b>2. Such variance is necessary for the preservation and enjoyment of a substantial property right or use possessed by other similarly situated property but which because of special circumstances is denied to the property in question; and</b></p> <p>As the ballfields’ general location cannot be changed and their use for active recreation is limited by their current deteriorated conditions, improvements are needed and must conform as much as possible to existing critical area rules. Both the City and State Parks agree (refer to the recitals in the 1/22/16 Memorandum of Understanding, Contract 16-C1507), that there are mutual benefits in improving the ballfields. Shifting the ballfield out of the wetland and enhancing both the wetland and buffer improves the function of the critical area while allowing for enjoyment of the historic ballfield.</p> <p>Analysis shows that, in fact, the existing field has not been maintained for safe game play, that its location in a wetland and poor drainage prohibits play throughout much of the year, and that, historically, more robust recreational</p>	

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			<p>facilities, including a striped football field, have been located on the site.</p> <p><b>3. The granting of such buffer width <i>variance</i> will not be materially detrimental to the public welfare or injurious to the property or improvement; and</b>                      The buffer width variance is not injurious to wetland A (see St. Edward State Park Field Improvements Critical Areas Report and Conceptual Wetland Mitigation Plan, ESA, 2018), but would instead improve its functioning by moving activity farther to the west, out of the wetland. Currently, there is <u>little</u> buffer function provided to the wetland; the existing grassy sports field is the buffer. Under the proposed project, the buffer would be planted with native shrubs and emergent plants to improve buffer function.</p> <p><b>4. The granting of the buffer width <i>variance</i> will not significantly impact the subject <i>critical area</i>;</b>                      The current ballfield is in the wetland and the buffer. The granting of the variance shifts the ballfield as far west as practicable (given that the general location must be preserved and to avoid tree removal along the west side of the field) and then improves the quality of both the wetland and the buffer (see St. Edward State Park Field Improvements Critical Areas Report and Draft Mitigation Plan, ESA, 2018). The environmental studies conclude that functioning of both the wetland the buffer would improve with the proposal.</p> <p>The Draft Stormwater Technical Information Report (TIR) discusses the wetland hydrology and includes figures, hydrologic modeling, and calculations showing that no</p>	

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			<p>impacts to Wetland A are expected. Per the Washington State Department of Ecology approved King County Surface Water Design Manual, the average daily volume to a wetland may not be increased or decreased by more than 20% and the average monthly volume may not increase or decrease by more than 15%. The modeling and calculations provided in the Draft Stormwater TIR support this condition.</p> <p><b>5. The decision to grant the <i>variance</i> includes the <i>best available science</i> and gives special consideration to conservation or protection measures necessary to preserve or enhance <i>anadromous fish habitat</i>; and</b>                      Numerous scientific studies have been completed for this project, including a wetland report (see St. Edward State Park Field Improvements Critical Areas Report and Conceptual Wetland Mitigation Plan, ESA, 2018), hydrological analyses (see December 2017 Draft Stormwater TIR), and discussion of streams and potential fish use (see SEPA Checklist B.3.a and B.5). The proposed ballfield renovation does not affect anadromous fish habitat. The project is located over 4,000 feet upstream from the nearest identified anadromous fish habitat (Lake Washington) (WDFW, 2016).</p> <p><b>6. The granting of the <i>variance</i> is consistent with the general purpose and intent of the <i>City's</i> comprehensive plan and adopted development regulations.</b>                      See applicant's Variance Justification, criterion 6.</p>	

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O-2	Opposition: Numerous underutilized fields exist and there are other more appropriate locations for field changes.	Finn 9/27/17 Slayden/Henders hott 9/25/17	<p>The grass ballfield is an existing recreation facility within St. Edward State Park. The ballfield has historically been used for a variety of organized team sports including soccer, baseball, football and cricket as well as other informal recreation uses. The ballfield has not been used for several years by youth or adult organized sports teams due to the poor condition of the field. Improving the ballfield would not preclude use by existing users and would provide game quality fields for use by the general public. The general public includes members or supporters of organized youth and adult recreational sports teams.</p> <p>The ballfield is a contributing factor to the St. Edward Seminary Historic District. The existing ballfield location reflects the District’s original site plan as described in the 2006 Cultural Landscape Inventory (CLI). The ballfield proposal is consistent with the St. Edward State Park Management Plan (CAMP) as further described in the SEPA checklist. The CAMP identifies continued use of the field for a variety of organized and unorganized recreational events. The CAMP also recommends preparing development, use and maintenance agreements with local organizations such as baseball, softball, soccer and cricket leagues and the City of Kenmore. The CAMP also notes that ballfields as community recreation facilities are primarily responsibility of local government.</p> <p>Kenmore residents live in the North Lake Little League (NLLL) and Northshore Youth Soccer Association (NYSA) service areas. These are the largest youth recreational sports leagues serving Kenmore and they have experienced</p>	<p>January 2018 Supply &amp; Demand Analysis</p> <p>Revised SEPA checklist</p>

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			<p>pressure in scheduling sufficient field time to meet the practice and game needs of their participants. The analysis of facility supply and demand focuses on these two leagues as the primary users of Kenmore fields, but it is also recognized that other existing and emerging active recreation activities continue to seek more field space in Kenmore and the region than is currently available.</p> <p>As shown in Figure 2, of the Supply and Demand Memo there are over 60 fields within a five-mile radius, but twelve leagues and five school districts compete for their use and there is a shortage of supply to meet the growing demand. Improving existing school fields which are currently scheduled for practice and games would improve quality of fields but would not necessarily increase the supply.</p> <p>The formula used by the City to assess supply and demand concluded that at full availability, the restoration of the two fields at Saint Edward Park into lighted turf facilities would meet the calculated current need for both game-quality and practice fields for both NYSA and NLLL.</p> <p>The language of the draft lease agreement would not allow for scheduled games on Memorial Day and on weekends and holidays from July 1 through Labor Day which are typically very popular times for park use. Field use during these times may be available for State Park scheduled play, open play or State Park sponsored events or may be used by the City for organized team practice only. State Parks also proposes a minimum of 24 daylight hours per week for State Park scheduled play/open play hours. Typically, organized team</p>	

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			<p>practices (e.g. youth baseball, soccer) start at 4pm and the assumption would be scheduled practice likely Monday through Thursday. The field would be unscheduled until 4pm on four week days and open all day on one weekday (likely Friday). Weekend games likely scheduled Saturday and Sunday, except no games on Memorial Day weekend or weekends and holidays July 1 through Labor Day. Also likely no weekend games in January or February.</p> <p>Two lighted turf fields at Saint Edward Park will add new capacity. They will substantially reduce current shortfalls in field supply for youth soccer and Little League in the City of Kenmore, and supply Kenmore’s proportionate share of top-quality game and tournament facilities.</p> <p>Big Finn Hill Park is within the youth sports boundaries of Kirkland Lacrosse and Lake Washington Youth Soccer Association. These public sports teams have first priority in scheduling for the synthetic turf field. Additional public youth sports from outside the service boundaries and public adult sports groups or unorganized drop-in play receive lower priority for scheduling remaining fields at the park. Returning leagues like the Kirkland Little League get priority use of the fields. The fields are fully scheduled for games and practices. The North Lake Little League got some limited time last year on the ballfield.</p>	
O-3	Opposition: Concern about loss of tranquility, serenity. Keep the natural setting.	Finley 9/25/17 Hough 9/13/17 Koehler 9/17/17 Prince 9/25/17	The proposed ballfield improvements are within the existing footprint of the historic ballfield. This site has been used for active and informal recreation for many years.	2006 Cultural Landscape Inventory

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		Slayden/ Hendershott 9/25/17	<p>The existing ballfield lies adjacent to the main park entry road which provides access to the Seminary, pool building and main parking areas. Park characteristics of tranquility, serenity and natural areas are maintained away from these existing buildings and active spaces.</p> <p>The Saint Edward Seminary Cultural Landscape Inventory (CLI), 2006, identifies the existing active recreation ballfield as a contributing factor to the St. Edward Seminary Historic District. The existing ballfield location reflects the District’s original site plan. The Inventory describes the “full development of the east side of the seminary building for recreational uses” (CLI, p. 43), including the field, ball courts and the gym. Recreational spaces were, in fact, emphasized in the St. Edward Seminary Historic District landscape (CLI, p. 11). The Inventory states that Washington State Parks should “continue use of historic sports field for active recreation (CLI, p. 163) on the “football field terrace” (CLI, p. 37) of the Historic District.</p> <p>The active sports field has been used, historically, for football, baseball and soccer. Field striping is shown in an early photograph (CLI, p. 44) and backstops and bleachers have been placed on the site. The sports field, along with the gymnasium and now-demolished tennis and handball courts, provided recreational facilities for the Saint Edward preparatory school—similar to athletic facilities provided by contemporary schools. Maintaining an active sports field is ultimately both consistent and compatible with the historic and cultural integrity and landscape of the historic district.</p>	Revised SEPA checklist

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			<p>The Washington State Parks historic preservation officer has visited the site with staff (October 2016) and suggested changes to ensure that historic views along the entry drive are maintained. The height of the new backstop has been reduced to protect the view of the seminary from the entry drive. Likewise, the “open and closed” pattern along the entry drive has been maintained by interrupting the proposed screening along the north side of the field (rather than providing continuous screening). Added to SEPA checklist B.10.c. Perspective drawings show maintenance of views to the seminary building from the access driveway (available on the City’s website).</p> <p>Temporary noise impacts would result from construction of the fields. Construction is anticipated to last four to six months. Following construction, a minimal increase in noise is expected to result from field use and maintenance. The park is currently well used by visitors for a variety of activities and events which generate various levels of human noise and also existing equipment noise from maintenance operations. The majority of the park area is forested which abates noise from surrounding properties and other areas in the park. The ballfields are also surrounded by trees which help abate noise and provide screening.</p> <p>In addition to Kenmore Municipal Code noise regulations, Washington State Parks seeks to minimize increases over existing noise levels at areas with elevated noise sensitivity. While Title 352 WAC (Parks and Recreation Commission) does not establish formal criteria to measure noise increases, 5 dBA is a historically-accepted threshold by</p>	

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			<p>which to assess adverse noise impacts. The draft Noise Study modeled predicted noise sources that are associated with ballfield uses, including a referee whistle, a baseball bat hitting a 50 mph pitch, and spectator cheering. The modeling showed that predicted sound levels from ballfield activity would not exceed the 5 dB increase criteria.</p> <p>The City acknowledges that the natural feel of the park in the area of the ballfield may be impacted by the project. However, mitigation measures will be utilized to reduce aesthetic impacts. These include using a turf color (such as a muted green) that blends into the natural context of the site; painting the light poles, bleachers, and backstops in black or brown; and establishing a mix of native conifers and evergreen shrubs along the north side of the field to partially screen the improved field. Other mitigation measures include reducing the height of the backstops from 28 feet to 24 feet and considering alternative backstop materials, such as netting, that could minimize the appearance of the backstops.</p>	
O-4	Opposition: Concern about loss of wetland, wetland impacts, wetland buffer impacts, insufficient mitigation.	Carlson 9/25/17 Finley 9/25/17 Ike 9/24/17 Slayden/Hendershott 9/25/17	<p>One wetland (Wetland A) and its associated 100-foot buffer is located along the east and south sides of the existing ballfield. Under current conditions, the wetland and buffer are impacted by recreational field use, and maintenance activities such as mowing. This mowed area provides limited habitat and water quality improvement functions.</p> <p>The project has been designed to avoid removal of trees to the greatest extent possible. However, the latest tree retention and protection plan (Tree Solutions, 2018), recommends the removal of eleven trees on the south side</p>	<p>Revised SEPA checklist</p> <p>January 2018 Draft Revised Critical Area Report and Conceptual Mitigation Plan</p> <p>Updated January 2018 Tree</p>

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			<p>of the ballfield, and pruning of four. This latest arborist report incorporates State Park standards in determining tree impacts and protection. Recommendations from the report were incorporated into the SEPA checklist (See Section B.4.b). Construction activities are anticipated to have minimal impact on the trees recommended for treatment, however due to existing conditions and the location of these trees, they may pose a safety hazard to future ballfield users. Three trees recommended for removal are located in the wetland buffer, and one is in the wetland.</p> <p>It is recommended that some trees are cut and left as snags to provide wildlife habitat. City Tree Protection standards (KMC Chapter 18.57) require a minimum number of tree units per acre of net buildable area. No trees within the net buildable area are proposed for removal and so no replacement is required for trees outside of critical areas. The City's Critical Areas standards (KMC Chapter 18.55) require that mitigation for hazard tree removals in critical areas be in-kind and onsite, and sufficient to maintain the functions and values of the critical area. The City proposes to replace the four trees removed from the wetland and wetland buffer, onsite, at a 3 to 1 ratio, exceeding code requirements. In addition, it is recommended that some hazardous trees are cut and left as snags to provide wildlife habitat.</p> <p>The field was shifted to the west but still within the existing ballfield footprint; buffer impacts are limited to a portion of the existing mowed grass ballfield. As mitigation for the loss of approximately 42,700 square feet of mowed wetland buffer, the City will enhance approximately 61,600 square</p>	Retention and Protection Plan (Tree Solutions)

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			<p>feet of existing, disturbed buffer and wetland area. Invasive vegetation will be removed from the enhancement areas and native herbs and shrubs will be installed, and the mitigation area will be protected in perpetuity.</p> <p>City code requires 5 years of monitoring for wetland mitigation projects (KMC 18.55.280), but the City will monitor the enhancement areas for 10 years to ensure the success of the plantings.</p>	
O-5	Opposition: Concern about artificial turf, and/or keep grass natural.	Carlson 9/25/17 Finley 9/25/17 Ike 9/24/17 Koehler 9/17/17 Prince 9/25/17 Slayden/Henders hott 9/25/17	<p>Impacts to soils will be limited to the footprint of the proposed synthetic turf field (approximately 2.25 acres). No chemicals or fertilizers will be used on the synthetic turf; surrounding soils and beneficial insects would not be significantly affected by the project.</p> <p>Removal of the existing sod would result in a minor loss of foraging habitat, although mowed grass is not considered to provide high-quality wildlife habitat. St. Edward State Park contains approximately 310 acres of undeveloped habitat, most of which is forest; the project would disturb less than 1% of the total habitat within the park. Additionally, approximately 20 acres of mown field habitat will remain in the park, adjacent to the seminary building and Bastyr University.</p> <p>To offset the loss of habitat provided by the mown field, enhancement plantings and other measures are proposed. The wetland and buffer enhancement, along with the native tree and shrub plantings proposed along the north side of the field, will provide a greater diversity and density of undisturbed native plant species in the vicinity. To further enhance wildlife habitat, the City will install nest and feeder</p>	2008 CAMP Report  Comparison of Synthetic turf vs natural turf (Bruce Dees & Associates 2016)  Revised SEPA checklist

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			<p>boxes, as well as bat boxes in the project vicinity. The City will also remove invasive plant species such as English ivy and holly in the vicinity of the ballfield to improve habitat conditions in adjacent undisturbed forested areas.</p> <p>The St. Edward State Park Management Plan (i.e. 'CAMP' report) pg. 18 states that the use of natural grass fields should continue, unless subsequent assessment shows that synthetic turf has "comparable to less environmental impact, no adverse health conditions, lower operating expenses, and does not impair park management, among other considerations."</p> <p>Synthetic turf results in less injury to players and requires less maintenance than natural turf. In addition, as opposed to well-maintained natural turf, synthetic turf does not use fertilizers or pesticides. Certified lead-free synthetic turf and inert sand/silica infill material would be installed; crumb rubber (i.e. ground rubber from truck and automobile tires) will not be used as infill material.</p> <p>A comparison of natural versus synthetic turf concluded that a properly maintained grass field would result in more water use, the potential for nutrient runoff from fertilizers, and gas/fuel entering the atmosphere from frequent mowing compared to a synthetic turf field.</p> <p>Synthetic turf absorbs solar energy faster than grass which can cause synthetic turf fields to become hotter than natural grass fields, especially in sunny weather. In general, heat increases from turf are less of a concern in mild climates</p>	

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			<p>such as the Puget Sound. Additionally, because the field is surrounded by forest habitat, the hours of the day that the entire field would be exposed to direct sunlight are limited.</p> <p>The synthetic turf product is expected to last at least 10 years. When the turf must be replaced, turf materials are recycled according to the requirements of the Resource Conservation and Recovery Act of the United States EPA. The recycling system is a heat and pressure extrusion method which processes 100% of the turf in whole, without separation. The residual product is reused in building products. The field infill material would be screened, cleaned and reused.</p>	
O-6	Opposition: Concern about field lighting and light impacts. Field highly frequented by bats.	Carlson 9/25/17 Hough 9/13/17 Ike 9/7/17 Koehler 9/17/17 Slayden/Henders hott 9/25/17	<p>Existing large security lights on the seminary building illuminate the adjacent parking lot and most of the existing ballfield. Only the extreme reaches of the eastern and southern edge of the ballfield, along the forest margin, approach darkness. These security lights stay on throughout the night year-round.</p> <p>The St. Edward State Park Management Plan (CAMP report) page 19 states that field lighting is not recommended. However, since 2008 when the CAMP report was authored, lighting technology has significantly evolved.</p> <p>The proposed LED lighting is designed to reduce light pollution and will utilize extensive shielding to reduce the impact of glare and spill light. The shielding proposed meets recommendations by both the International Dark Sky Association and Nature Conservancy report on outdoor LED lighting.</p>	<p>2008 St. Edward State Park Management Plan</p> <p>Revised SEPA checklist</p> <p>Updated hours of light/darkness table</p> <p>August 2017 Bat Survey report by Owl Ridge</p> <p>ESA 8/31/17 review of St. Edward State Park Bat Study</p>

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			<p>Since the lighting system dramatically reduces the amount of up-light delivered into the atmosphere, there is a safety issue with tracking fly balls during baseball\softball play. Fly balls disappear when travelling into the zone of darkness that exists above the height of the floodlights. To properly light fly balls there will be one floodlight on four of the poles that will be directed up to provide the minimum amount of light necessary for safe play. All other floodlights are aimed down within the athletic field boundaries.</p> <p>The proposed LED color temperature for the floodlights has been reduced from 5,700K to 4,000K. The use of 5,000K and 5,700K LED's is typical for outdoor athletic field lighting systems throughout North America. Although there are recent studies regarding use of lower temperature LED's to reduce amounts of blue light, these reports do not analyze impacts of sports lighting systems that do not operate from dusk to dawn. Instead, existing research addresses how indoor lighting systems and outdoor dusk to dawn lighting systems affect human circadian rhythms. Reducing the color temperature to 4,000K, , is proposed as an additional mitigation measure to further reduce any potential impacts to nocturnal birds, bats, and other animals that are present in the vicinity.</p> <p>A variety of mitigation measures will be implemented to minimize lighting impacts to light-sensitive species. Proposed lighting mitigation measures include: installing lighting as close to the field as possible; using lighting only during scheduled gameplay; using the latest LED lighting technology to reduce the impact of glare and</p>	<p>ESA 9/25/17 nocturnal bird survey and findings</p> <p>8/11/11 Washington State Parks Natural Resource Management Policy</p> <p>Revised Ballfield Supply and Demand Memo (January 2018)</p>

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			<p>spill light; installing native conifer and shrub species to buffer field lighting from the rest of the park; and installing bat boxes in the vicinity to enhance bat habitat in the area. The proposed lighting schedule has been revised to limit the use of lighting to no earlier than 4:45 p.m. and no later than 9 p.m and limit lighting to March, April, October, and November, fully avoiding the summer months when bats are most active. Additional mitigation measures proposed: retrofitting the forest trail lights running parallel to Seminary Drive with more up-to-date, nocturnal-friendly fixtures; working with State Parks and the seminary tenant to remove the bright, old-style horizontal lights on the Seminary and Gymnasium that partially illuminate the field 24 hours a day, year-round.</p> <p>A bat study was completed for the park on behalf of State Parks. In contrast to the high diversity of bats and high numbers of bat detections near the watered sites (detention pond and lakeshore), 91% of the detections at the ballfield consisted of one common species - the silver-haired bat (<i>Lasionycteris noctivagans</i>), which is known to forage along forest clearings, above ponds, along riparian areas, and above trees. The only other species recorded here were nine detections of the hoary bat (<i>Lasiurus cinereus</i>), two of the Yuma myotis (<i>Myotis yumanensis</i>), and one of the long-legged myotis (<i>M. volans</i>). All of these bats are common species in western Washington. The conclusion of this study is that adding lighting might reduce the habitat value of certain areas to bats. A review of this study concluded that the project impacts to bats have been reduced to a</p>	

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			<p>negligible level (Final Bat Study Memo, available on City project website).</p> <p>Bat use of the ballfield appeared limited to the darker recesses adjacent to the forest and above the wetland ditch along the eastern edge. Bat use of this edge of the ballfield was highest from late June to the July 2<sup>nd</sup> and then fell precipitously to either no detections or just two detections per evening through early August. Thus, bat use of the area appears to be limited to a small area adjacent to the forest for a short portion of the summer.</p> <p>The conclusion of ESA’s review of the bat study is that because the proposed ballfield lighting plan uses guidelines of the International Dark Sky Association and The Nature Conservancy (in particular, using hardware to reduce light spillage and avoiding light schedules that cause conflicts for foraging bats), there would be negligible effects to bats under the proposed lighting plan.</p> <p>The lighting plan would have only negligible effects because of the following:</p> <ul style="list-style-type: none"> <li>• The proposed light schedule has been updated. Lighting will now only occur during four months: March, April, October and November.</li> <li>• Lights will not be used during the peak bat seasonal use months (June and July), or during May and August when bat use is minimal.</li> <li>• Lights will be turned on at 4:45 p.m. at the earliest and turned off by 9:00 p.m., at the latest, year-round.</li> <li>• There are no special-status bats in the area.</li> </ul>	

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			<ul style="list-style-type: none"> <li>• There are no known roosting or maternal colonies nearby.</li> <li>• Bats use the ballfield for a short duration during the summer that coincides with the time the ballfield Surveys indicate that more productive foraging areas are present within a short distance from the ballfield.</li> <li>• The proposed lighting technology adheres to conservation recommendations and reduces spill out from the field of play; areas outside of the ballfield will not be significantly affected by the field lighting.</li> </ul> <p>The nocturnal bird survey completed by ESA detected owls in the vicinity of the ballfield but concluded that lighting would have only negligible effects because of the following.</p> <ul style="list-style-type: none"> <li>• The shielding meets the recommendations by the National Dark Sky Association and Nature Conservancy guidelines for LED lighting.</li> <li>• Lights will be turned off by 9:00 p.m., at the latest, year-round.</li> <li>• There are no special status crepuscular or nocturnal bird species in the area.</li> <li>• The ballfield and surrounding forest edge is already partially illuminated by bright floodlights throughout the night hours.</li> <li>• The proposed lighting technology adheres to conservation recommendations and reduces spill out from the field of play; areas outside of the ballfield will not be significantly affected by the field lighting.</li> </ul> <p>The State Parks Natural Resource Policy for common native species and habitats states “State Parks will preserve,</p>	

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			<p>promote and protect all native species and their respective habitats in balance with the agency’s cultural resources protection and recreation objectives. Where native species are significantly impacted by regulations or Commission sanctioned actions efforts will be made to minimize and mitigate these impacts”. Significant is further defined as “having or likely to have an important (usually quantifiable) effect”.</p> <p>Under the State Environmental Policy Act (SEPA), a significant effect is defined as “...a reasonable likelihood of more than a moderate adverse impact on environmental quality” (WAC 197-11-794).</p> <p><i>The project is not expected to have a significant impact on bats or nocturnal birds, as defined by State Parks policy or SEPA.</i></p>	
O-7	Opposition: Project supports narrow group of users while negatively impacting use by other current field user groups.	Slayden/Henders hott 9/25/17 Finley 9/25/17	<p>The project enhances recreational opportunities at St. Edward State Park for the general public which includes public use by organized and informal recreation users. The area of the ballfield within St. Edward State Park will continue to be owned, operated and maintained by public agencies for use by the general public.</p> <p>The CAMP (pages 18 and 19) identifies continued use of the field for a variety of organized and unorganized recreational events. The CAMP also recommends preparing development, use and maintenance agreements with local organizations such as baseball, softball, soccer and cricket leagues and the City of Kenmore. The lease agreement between the City and State Parks would provide the terms</p>	2008 St. Edward State Park Management Plan (CAMP)

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			and conditions for improving, operation and maintenance of the ballfield. The draft lease terms prescribe times for unscheduled open play. See response to Comment O-2.	
O-8	Opposition: Concern about increased noise.	Hough 9/13/17 Prince 9/25/17 Slayden/Henders hott 9/25/17	See response to Comment O-3 for information about noise impacts.	June 2017 Greenbusch Noise Study
O-9	Opposition: Concern about parking overflow.	Hough 9/13/17	<p>There are 220 existing parking stalls at St. Edward State Park to serve park users. Sound Engineering recommended adding 38 additional parking stalls to accommodate growth in general park users over the next 20 years, and to monitor the parking occupancy to ensure the stalls meet the demand. 12 new stalls are proposed at the northern loop lot, while 7 new stalls are proposed adjacent to the ballfield.</p> <p>Fehr &amp; Peers agrees with Sound Engineering that some growth in general park users is expected over the next 20 years. That growth may result in more days and longer periods of overcapacity parking. Fehr &amp; Peers continues to recommend that the City of Kenmore provide 19 parking stalls as part of the upgrade to the ballfields, to accommodate the expected growth. The City identified possible locations to site a number of additional parking stalls to address general park user growth.</p> <p>The lease agreement will include a condition that the City construct 19 additional stalls at a future date, to reach the 38 stalls recommended by Sound Engineering over the next 20 years.</p>	<p>Revised SEPA checklist</p> <p>5/26/16 Fehr &amp; Peers Traffic and Parking Analysis</p> <p>6/23/17 Fehr &amp; Peers St. Edward State Park Parking Study Review</p> <p>April 2017 Sound Engineering St. Edward State Park Parking Study</p>

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			<p>The Sound Engineering assumption that parking supply at the park is at capacity is a very conservative assumption, since parking demand currently only exceeds capacity on fewer than 4 percent of days per year.</p> <p>The new ballfields would remove the existing overflow parking area which is used for large special events. The City will provide alternative parking for City events needing overflow parking, and will work with State Parks to develop a plan for any other event needing overflow parking, as proposed in the lease language. These events are the six City-sponsored summer evening concerts, and the one day historic British-car meet.</p> <p>The language of the draft lease agreement would not allow for scheduled games on Memorial Day or on weekends and holidays from July 1 through Labor Day which are typically very popular times for park use (added to SEPA checklist B.12.c). The TRAFx data shows some of the busiest days have been holidays and weekends from July 1 through Labor Day. The Fehr &amp; Peers parking occupancy studies show that weekday games can be accommodated with the existing parking supply. If this scheduling is strictly adhered to, the City's addition of 19 parking spaces would be an amenity for park users, but not technically required to accommodate the upgrade of the ballfields.</p>	
O-10	Opposition: Concern about increased traffic.	Hough 9/13/17 Prince 9/25/17	The proposal will generate additional traffic; however, the existing roadways and signals are adequate to handle the expected increase. The trip generation analysis was based on a worst-case scenario of two games ending and two games beginning within the same hour. To be conservative,	Revised SEPA checklist  5/26/16 Fehr & Peers Traffic and

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			<p>it was assumed that there is no carpooling among coaches, players, or referees. It was also assumed that some parents do not stay to watch the game, which creates more vehicle trips into and out of the park, due to drop-off. This conservative analysis results in 192 peak hour vehicle trips into and out of the park (96 in and 96 out). This is the maximum one-hour trip generation for weekday and weekend.</p> <p>The traffic analysis showed the added trips to the park entrance intersection will increase delay at the intersection of NE 145<sup>th</sup> Street and Juanita Drive NE by about 11 seconds per vehicle, but the delay can be mitigated by updating the signal timing. The expected Level of Service (LOS) of the intersection with the added trips meets the City’s standard. Furthermore, the City of Kenmore has planned for this level of development. The recently added traffic signal provides the highest level of safe site access.</p> <p>In general, an increase in traffic increases the likelihood of a collision. However, the roads in St. Edward State Park are low speed with no history of collisions. We would not expect the increase in traffic to increase collisions with the added traffic from the ballfields.</p>	<p>Parking Analysis</p>
O-11	<p>Opposition: Concern about lack of exact drainage plan to be used.</p>	<p>Finley 9/25/17</p>	<p>The stormwater system for the proposed field is designed according to current Washington Department of Ecology stormwater standards. Overall, the system is designed to mimic pre-development conditions, in order to maintain surface and groundwater flows to the surrounding wetland and stream.</p>	<p>“Draft” December 2017 Stormwater Technical Information Report (TIR)</p> <p>Revised SEPA</p>

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			<p>The elevation difference between the field underdrain system and the wetland limits the ability to provide treatment to runoff entering the wetland. To keep contaminants out of the wetland, only non-pollution generating surfaces will discharge to the wetland. A continuous model (Western Washington Hydrology Model) was used to determine the average daily volume and average monthly volume of stormwater runoff to the wetland in the existing condition. The model was then run for the proposed condition and compared to the existing condition to determine the amount of grass and non-pollution generating permeable concrete walkway that should discharge to the wetland in order to keep the average daily and monthly rainfall volumes within the allowable ranges of 20% maximum change to daily volume and 15% maximum change to monthly volume.</p> <p>The proposed synthetic turf field will be permeable to water. Directly below the turf and backing pad will be a plastic collection grid system that has 95% void space for stormwater runoff; stormwater will accumulate and flow to a detention system constructed underneath the field. Water will be discharged from the detention system to the proposed water quality treatment facility, and then after being treated discharges to the existing ditch which leaves the project site at the southwest corner of the site. The detention facility is designed to release stormwater at a rate similar to existing conditions and the Draft Stormwater TIR documents and demonstrates that this facility is in compliance with the Department of Ecology Stormwater Code and Washington State law.</p>	<p>checklist</p>

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O-12	Opposition: Proposed improvements are inconsistent/incompatible with the park's historic landscape.	Koehler 9/17/17 Prince 9/25/17	See response to Comment O-3.	2006 St. Edward Cultural Landscape Inventory  Revised SEPA checklist  Perspective drawings
O-13	Opposition: Concern about plant and wildlife impacts, impact on ecosystem/ biodiversity corridor and loss of/impact to natural habitat including for bats, owls, frogs, and anadromous fish	Carlson 9/25/17 Prince 9/25/17 Slayden/Henders hott 9/25/17	<p>The existing ballfield is routinely mowed and experiences frequent recreational use. This area generally has low habitat value, but it is likely used as a foraging area by birds such as American robins, ravens, American crows, and swallows. Mammals may also use the field as part of a larger foraging area or as part of a movement corridor between forested portions of the park. The ditched portion of Wetland A along the east side of the ballfield may provide a seasonal water source for some species.</p> <p>Removal of the existing sod would result in a minor loss of foraging habitat, although mowed grass is not considered to provide high-quality wildlife habitat. St. Edward Park contains approximately 310 acres of undeveloped habitat, most of which is forest; the project would disturb less than 1% of the total habitat within the park. Additionally, approximately 20 acres of mowed field habitat will remain in the park, adjacent to the seminary building and Bastyr University.</p> <p>The degraded emergent wetland adjacent to and within the</p>	<p>January 2018 Draft Revised Critical Area Report and Draft Mitigation Plan</p> <p>Revised SEPA checklist</p> <p>August 2017 Bat Survey report by Owl Ridge</p> <p>ESA 8/31/17 review of St. Edward State Park Bat Study</p> <p>ESA 9/25/17 nocturnal bird</p>

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			<p>ballfield likely does not provide suitable habitat for salamander species or other wetland-dependent species because the area is frequently mowed and functions as a recreational area. The red legged frog has not been observed in the project vicinity. In 2006 and 2007, Washington Department of Natural Resources conducted an amphibian and reptile survey in St. Edward State Park; red legged frogs were not observed anywhere in the park. Additionally, Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) does not include any listings for red legged frog in the park. However, Pacific chorus frog have been seen in the emergent wetland in the spring of 2017. The Critical Areas Report has been updated to include this information.</p> <p>The proposed ballfield improvements were designed to completely avoid impacts to Wetland A and forested portions of its buffer. The field was shifted to the west but still within the existing ballfield footprint; buffer impacts are limited to a portion of the existing mowed grass ballfield. As mitigation for the loss of approximately 42,700 square feet (0.98 acre) of mowed wetland buffer, the City will enhance approximately 61,600 square feet (1.4 acres) of existing, disturbed buffer and wetland area. Invasive vegetation will be removed from the enhancement areas and native herbs and shrubs will be installed, and the mitigation area will be protected in perpetuity. Overall, the mitigation proposal will provide a greater diversity and density of native plants and increase the habitat value for native wildlife species, as compared to existing conditions.</p>	<p>survey and findings</p> <p>Updated December 2107 Stormwater Technical Information Report (Perreet)</p>

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			<p>WDFW confirmed during a May 2016 site visit that the stream (Stream #0226) that flows south from Wetland A, originating approximately 400 feet south of the existing ballfield, is a regulated water of the state that potentially provides resident salmonid (e.g. trout) habitat. WDFW also referred to the ditched watercourse at the southeastern corner of the existing ballfield as a potential non-fish bearing water of the state. SalmonScape maps show several anadromous species in Lake Washington (including documented fall Chinook, coho, sockeye, and winter steelhead, and presumed bull trout/Dolly Varden). However, none of these fish species are shown using Stream #0226 (The Washington Department of Natural Resources maps the stream as Type N (non-fish-bearing). The project has no direct impact to the stream.</p> <p>The project will not result in a significant impact on water quality. It has been designed to avoid and/or minimize impacts to the surrounding wetland and nearby stream and is in full compliance with Washington State Department of Ecology standards. Water quality monitoring will take place in the emergent portion of the wetland adjacent to the ballfields, the non-fish bearing portion of the stream, and the adjacent forested wetland. Monitoring will be completed weekly during construction of the project only. No monitoring will be conducted after the project is constructed. Monitoring will include testing for pH, turbidity, and temperature to ensure that project construction does not affect the water quality of the wetland, stream, and the adjacent forested wetland.</p> <p>Additionally, water quality treatment is now proposed to</p>	

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			<p>treat runoff before it is discharged to the stream(added to SEPA Checklist B.3.c.2). The Drainage Plans have been revised to show a StormFilter Manhole downstream of the ballfield, but upstream of the project discharge location. As discussed in the Draft Stormwater TIR, a StormFilter Manhole is a concrete manhole that uses filter cartridges to treat stormwater and remove contaminants. This product and the cartridge filters have been approved for use by the Washington State Department of Ecology. The Draft Stormwater TIR contains a discussion and calculations which document that this proposed treatment method will ensure that the St. Edward Park Ballfield is in compliance with local and state laws for stormwater discharges.</p> <p>The bat study completed for State Parks concludes that adding lighting “might” reduce the value of certain areas to bats. The ESA review of the bat study and the ESA nocturnal bird survey conclude that the effects of the proposed project have been reduced to a negligible level in accordance with State Park’s guidelines. The proposed lighting schedule has been revised since these studies took place to further reduce potential impacts. Lighting is only proposed for the months of March, April, October, and November, will be turned on at 4:45 p.m. at the earliest, and turned off at 9 p.m. at the latest. See response to Comment O-6 for additional proposed mitigation measures.</p> <p>There are no threatened or endangered species known to be present in the project area. Bald eagle (recently federally delisted) and pileated woodpecker (state candidate species) are documented in the greater St. Edward State Park by the</p>	

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			<p>WDFW Priority Habitats and Species program. Several other state or federally listed sensitive species could be present in forest or wetland habitats in the project vicinity, including western toad, Vaux’s swift, olive-sided flycatcher, several species of bats, and mink (City of Kenmore, 2004).</p> <p>The degraded emergent wetland adjacent to and within the ballfield likely does not provide suitable habitat for salamanders or other wetland-dependent species because it is frequently mowed and functions as a recreational area. Red legged frog has not been observed in the project vicinity. In 2006 and 2007, Washington Department of Natural Resources conducted an amphibian and reptile survey in St. Edward State Park; red legged frog were not observed anywhere in the park. Additionally, Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) does not include any listings for red legged frog in the park. However, Pacific chorus frogs were observed in the emergent wetland in the spring of 2017. The Critical Areas Report has been updated to reflect this observation.</p>	
O-14	<p>Opposition: Project components including artificial turf and impact to buffer are not compatible with the focus of the proposed Environmental Education and Research Center (EERC) and Wilderness Awareness School. The Wilderness Awareness School will no longer be able</p>	Carlson 9/25/17	<p>The existing grass field is mown, which includes the wetland on the eastern edge of the field and all the associated wetland buffer.</p> <p>The proposed restoration and enhancement of both the wetland and buffer could provide educational opportunities for both the future EERC and the Wilderness Awareness School.</p> <p>The field development will not necessarily displace existing</p>	<p>Revised SEPA checklist January 2017 Revised Ballfield Supply and Demand Analysis  January 2018 Draft Revised Critical Area Report and</p>

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	to use the field for orientation and staging.		users, including the Wilderness Awareness School who use the field as a staging area and may continue to do so. As described in the response to Comment O-2, scheduling of the field will allow for regular open play hours and State Parks activities.	Draft Mitigation Plan
O-15	Opposition: The field represents 35% of the useable, flat land, and almost 100% of the useable, flat, ADA accessible land in the park not directly adjacent to the hotel.	Finley 9/25/17	The ballfield is not currently ADA accessible. The proposed ballfield project will include ADA parking and ADA access to the field. Improving the field will not preclude existing users.	
O-16	Opposition: Concern about heat island effect from turf and lighting	Carlson 9/25/17	Synthetic turf absorbs solar energy faster than grass which can cause turf fields to become hotter than natural grass fields, especially during sunny weather. In general, heat increases from turf are less of a concern in mild climates such as the Puget Sound. Additionally, because the field is surrounded by forest habitat, the hours of the day that the entire field would be exposed to direct sunlight are limited.	
<b>Support</b>				
S-1	General: Support the ballfield proposal; protects the environment	Hughes 9/25/17 Mulcare 9/25/17 Painter 9/21/17	Overall, the mitigation proposal will provide a greater diversity and density of native plants and increase the habitat value for native wildlife species, as compared to existing conditions.	Revised SEPA checklist  January 2018 Revised Critical Area Report and Draft Mitigation Plan
S-2	Support: Moving ballfield out of the wetland. Wetland restoration and enhancement and buffer enhancement as	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17	Comments noted are consistent with the proposed project as designed. The project does shift the ballfield to the west out of the wetland within the existing grass footprint.	Revised SEPA checklist  January 2018

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	mitigation for buffer impacts.	Levy 9/20/17 Looney 9/21/17 Mulcare 9/25/17 Mullins 9/21/17 Painter 9/21/17 Rigor 9/25/17 Schmitt 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17	Overall, the mitigation proposal will provide a greater diversity and density of native plants and will increase the habitat value for native wildlife species, as compared to existing conditions.	Revised Critical Area Report and Draft Mitigation Plan
S-3	Support: Support investment in ballfields for youth and local sports programs. Shortage of useable fields in Kenmore.	Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Mulcare 9/25/17 Rigor 9/25/17 Schmitt 9/25/17 Symons 9/25/17	<p>The ballfield improvement project enhances recreational opportunities at St. Edward State Park for the general public which includes public use by organized and informal recreation users.</p> <p>Even with the reduced hours and days proposed in the draft lease agreement between the City of Kenmore and Washington State Parks, two lighted turf fields at Saint Edward Park will add new capacity. They will substantially reduce current shortfalls in field supply for youth soccer and Little League in the City of Kenmore, and supply Kenmore’s proportionate share of top-quality game and tournament facilities.</p>	Revised January 2018 Supply & Demand Analysis
S-4	Support: Reduction of potential contaminants for field turf maintenance, fertilization, irrigation, as well as noise and exhaust from mowing	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17	Comments noted are consistent with the analysis comparing synthetic turf to natural turf. In general, synthetic turf fields require less maintenance, less use of water, and no use of fertilizers compared to natural turf.	<p>Synthetic turf vs natural turf analysis</p> <p>Revised SEPA checklist</p>

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		Mullins 9/21/17 Rigor 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17		
S-5	Support: Adequate parking exists and more is proposed	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17 Mullins 9/21/17 Rigor 9/25/17 Schmitt 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/20/17	<p>There are 220 existing parking stalls at St. Edward State Park to serve park users. Fehr &amp; Peers continues to recommend that the City of Kenmore provide 19 parking stalls as part of the upgrade to the ballfields. 12 new stalls are proposed in the loop lot, and 7 new stalls are proposed adjacent to the ballfields.</p> <p>The additional 19 stalls, to reach the 38 stalls recommended by Sound Engineering over the next 20 years, should be added as needed at a rate appropriate for the growth in general park users. The lease agreement will include a condition that the City construct 19 additional stalls at a future date, to reach the 38 stalls recommended by Sound Engineering over the next 20 years.</p> <p>Sound Engineering assumption that parking supply at the park is at capacity is a very conservative assumption, since parking demand currently only exceeds capacity on fewer than 4 percent of days per year.</p>	<p>Revised SEPA checklist</p> <p>5/26/16 Fehr &amp; Peers Traffic and Parking Analysis</p> <p>6/23/17 Fehr &amp; Peers St. Edward State Park Parking Study Review</p> <p>April 2017 Sound Engineering St. Edward State Park Parking Study</p>
S-6	Support: Traffic study shows very little impact	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17	The proposal will generate additional traffic; however, the existing roadways and signals are adequate to handle the expected increase. The trip generation analysis was based on a worst-case scenario of two games ending and two games beginning within the same hour. To be conservative, it was assumed that there is no carpooling among coaches,	<p>Revised SEPA checklist</p> <p>5/26/16 Fehr &amp; Peers Traffic and Parking Analysis</p>

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		Mullins 9/21/17 Rigor 9/25/17 Schmitt 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/20/17	<p>players, or referees. It was also assumed that some parents do not stay to watch the game, which creates more vehicle trips into and out of the park, due to drop-off. This conservative analysis results in 192 peak hour vehicle trips into and out of the park (96 in and 96 out). This is the maximum one-hour trip generation for weekday and weekend.</p> <p>The traffic analysis showed the added trips to the park entrance intersection will increase delay at the intersection of NE 145<sup>th</sup> Street and Juanita Drive NE by about 11 seconds per vehicle, but the delay can be mitigated by updating the signal timing. The expected Level of Service (LOS) of the intersection with the added trips meets the City's standard. Furthermore, the City of Kenmore has planned for this level of development. The recently added traffic signal provides the highest level of safe site access.</p> <p>In general, an increase in traffic increases the likelihood of a collision. However, the roads in St. Edward State Park are low speed with no history of collisions. We would not expect the increase in traffic to increase collisions with the added traffic from the ballfields.</p>	
S-7	Support: State-of-the-art shielded lighting being used, a standard approved by the Dark Skies Association. Nocturnal bats not active during time of year when lighting utilized. Nocturnal animals and owls not	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17 Mullins 9/21/17 Rigor 9/25/17	See response to Comment O-6.	Revised SEPA checklist  Lighting plan  Stantec 7/5/17 letter

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	impacted.	Schmitt 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17		Hours of light/darkness  August 2017 Bat Survey report by Owl Ridge  ESA 8/31/17 review of St. Edward State Park Bat Study  ESA 9/25/17 nocturnal bird survey and findings  8/11/11 Washington State Parks Natural Resource Management Policy  Ballfield Supply and Demand Memo

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S-8	Support: Noise study shows no significant impact	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17 Mullins 9/21/17 Rigor 9/25/17 Schmitt 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17	The noise study concluded that predicted sound levels from field activities do not exceed the 5 dB increase criteria. Therefore, no noise impacts are predicted.	June 2017 Greenbusch Noise Study
S-9	Support: Seminary developer is on record supporting this project	Lane 9/25/17 Levy 9/20/17 Schmitt 9/25/17 Symons 9/25/17	Comment noted.	
S-10	Wildlife impacts have been evaluated and mitigated; habitat enhanced	Anderson 9/25/17 Hayes 9/25/17 Looney 9/21/17 Mullins 9/21/17 Rigor 9/25/17 Spring 9/25/17 Wagner 9/21/17	Overall, the mitigation proposal will provide a greater diversity and density of native plants and increase the habitat value for native wildlife species, as compared to existing conditions.	Revised SEPA checklist  January 2018 Revised Critical Area Report and Draft Mitigation Plan

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S-11	Support: Project will cut down on driving by parents of players and reduce carbon emissions and traffic congestion	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17 Mullins 9/21/17 Rigor 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17	Comment noted. The number of player trips, amount of reduction in carbon emissions and traffic congestion has not been quantified.	
S-12	Support: These are historic ballfields that have been played on for decades	Anderson 9/25/17 Hayes 9/25/17 Lane 9/25/17 Levy 9/20/17 Looney 9/21/17 Mulcare 9/25/17 Mullins 9/21/17 Rigor 9/25/17 Spring 9/25/17 Symons 9/25/17 Wagner 9/21/17	The proposed ballfield improvements are within the existing footprint of the historic ballfield. This site has been used for active and informal recreation for many years.  The Saint Edward Seminary Cultural Landscape Inventory (CLI), 2006, identifies the existing active recreation ballfield as a contributing factor to the St. Edward Seminary Historic District.	2006 Cultural Landscape Inventory  Revised SEPA checklist