



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

Carnation Wastewater Treatment Facility EIS Scoping Comments Summary Report

September 2003

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ALTERNATIVE FORMATS AVAILABLE UPON REQUEST
BY CALLING 206-684-1280 OR 711 (TTY)

Introduction

At the request of the City of Carnation, King County proposes to build a new wastewater treatment facility to serve that City. In addition to a treatment plant, the project includes conveyance and discharge facilities.

The County's Department of Natural Resources and Parks, Wastewater Treatment Division (WTD) is preparing an Environmental Impact Statement (EIS) for the project under the State Environmental Policy Act (SEPA). WTD conducted an expanded State Environmental Policy Act (SEPA) scoping process under WAC 197-11-410. Scoping is the first formal step in the SEPA environmental review process for development of an EIS. Its purpose is to narrow the focus of the EIS to significant environmental issues, inform people that a proposed project may be located in their area, eliminate insignificant impacts from detailed study and identify alternatives to be analyzed in the EIS.

As lead agency for SEPA review, King County issued a Determination of Significance and Scoping Notice on July 28, 2003. The comment period ended on September 12, 2003, allowing more than 45 days for comments to be prepared and submitted to King County. About 4,000 notices were sent out to potentially affected parties. A public hearing/open house was held at the Carnation Elementary School on August 6, 2003. Notice was provided on the project web site, legal notices were placed in local newspapers, and other legal notification requirements were met.

King County received a total of 76 individual comment submittals (letters, e-mails, mail-back comment forms from the scoping notices, and/or testimony to a court reporter) from 66 parties. Many submittals contained multiple individual comments. Of the 66 commenters, 53 were individual citizens, 9 were public agencies and the others were interest groups or other organizations. Scoping comments will help focus the analysis in the Draft EIS. The public will have an opportunity to comment on the Draft EIS after it is issued in early 2004.

This scoping summary is organized by SEPA element of the environment with a separate section for comments on alternatives. The summary is not intended to identify every scoping comment or question that was asked about the project, but to provide an understanding of the types of comments and give a general sense of the number of commenters raising particular issues. The approximate number of commenters raising issues in each category is provided in parentheses following the category heading. This number is approximate because some comments combined subjects.

Some of the comments submitted are not within the scope of the EIS. These are summarized separately at the end of the report.

Earth Resources (10)

In general, comments on earth resources requested that the EIS evaluate the project's potential impacts on these resources and identify potential mitigation measures for those impacts. Specific topics included impacts of upland discharge, including soil contamination and erosion; impacts

of surface water discharge, including bank stability at Chinook Bend; and potential impacts of conveyance and upland discharge resulting from earthquakes.

Air Resources (7)

Four of the comments on air resources requested that the EIS evaluate potential odor impacts of the project. The other comments asked for a description of existing air quality, an evaluation of potential impacts to the air and an evaluation of the air impacts of upland discharge.

Water Resources (36)

In general these comments fell into three categories: general water quality, surface water discharge and upland discharge. In the first category, comments requested that the EIS show the constituents of the wastewater coming from the plant compared to drinking water and that the EIS evaluate the impacts of metals, viruses and hormones in the discharge. One comment requested a discussion of the effects of a 100-year flood on the treatment plant.

In the category of surface water discharge, comments asked that the EIS describe potential impacts of that discharge and potential mitigation measures. Specific topics included impacts on the Snoqualmie River, ability of the discharge to meet the Snoqualmie River's Total Maximum Daily Load (TMDL) requirements, monitoring the river's water quality, permitted levels of wastewater constituents in surface water and upland discharges, effects of river flooding at the outfall location, and potential effects of wastewater use for irrigation on river levels.

In the category of upland discharge, comments again asked that the EIS describe potential impacts and mitigation measures related to that discharge. Specific topics included impacts on aquifers, groundwater levels, surface waters (including lakes, ponds, streams, wetlands and springs), water pressure, water availability and under "super saturated" or flood conditions. Some comments also asked for information on existing conditions, including groundwater quality and groundwater and surface water locations and levels by season.

Biological Resources (18)

Generally, these comments requested analysis of potential impacts on fish, wildlife and their habitats from every element of the project, along with identification of mitigation measures. Most of the comments concerned the surface water discharge. Specific topics included impacts on salmon habitat near Chinook Bend, Carnation Farm Road bridge and near the city-owned treatment plant site alternative; impacts of endocrine disrupting chemicals on salmon; impacts on salmon in vicinity of Harris Creek; impacts on chinook and other salmon; impacts on aquatic life in the Snoqualmie River; and monitoring for potential fisheries impacts.

Other comments requested evaluation of impacts on fish and wildlife from upland discharge, wetland discharge or conveyance pipelines.

Environmental Health (27)

Most of the comments on health issues focused on the upland discharge. They requested evaluation of the impacts of this discharge and identification of mitigation measures. Specific topics included impacts on wells, basements, septic systems, aquifers and food plants; impacts from leaching of toxins from the old Carnation landfill; and impacts resulting from soil contamination. One comment requested monitoring to prevent well contamination. Another asked for the identification of safety measures preventing access to the upland disposal site. Other comments asked for identification of existing homes with basements, wells and/or drainfields that could be affected by upland discharge.

Topics related to surface water discharge included a question on whether or not King County would recommend swimming downstream of the outfall during the summer, a question about how discharging all of Carnation's treated effluent into the river will improve the environment and a request to make the effluent safe.

Topics related to the treatment plant included impacts of hazardous materials and identification of mitigation measures, impacts of flooding the treatment plant and impacts of safeguard failures.

One comment requested evaluation of the impacts of existing wastewater treatment systems on public health and water quality.

Under SEPA, noise is an element of environmental health. Comments on noise requested identification of existing noise levels and evaluation of the project's potential short-term and long-term noise impacts along with potential mitigation measures.

Land and Shoreline Use (32)

In addition to strictly land and shoreline use, SEPA includes recreation, aesthetics and cultural resources under this heading. Each of these three subtopics is discussed under its own subheading below.

Regarding land and shoreline use, the comments concerned either land use impacts or compliance with land use laws, plans and policies. Specific land use impact topics included impacts of the treatment plant and upland discharge and impacts on agricultural land. In addition, several comments recommended consideration of using wastewater to irrigate agricultural lands.

Comments on compliance with land use laws, plans and policies asked for an explanation of how placing an upland discharge outside Carnation's city limits is in compliance with King County regulations and policies and whether the City of Carnation has a County-approved comprehensive sewage system plan. Some comments also asked for a description of required permits and permitting processes.

Aesthetics

Most of the comments on aesthetics focused on visual or quality of life impacts. In the former category, comments asked for evaluation of impacts and identification of mitigation measures. Specific topics included visibility of the treatment plant site and upland discharge, use of landscaping as a mitigation measure, light and glare impacts and mitigation, and discoloration of the river from wastewater discharge.

Comments on quality of life requested evaluation of the impacts of the concrete plant site, conveyance pipeline and upland discharge on quality of life.

Recreation

Comments requested evaluation of the project's impacts on recreational use of the Snoqualmie River and waters in and around Horseshoe Lake.

Cultural Resources

Comments pointed out requirements to comply with federal and state laws concerning cultural resources and requested that monitoring of ground disturbing activities be provided for.

Transportation (6)

Generally, these comments asked for an evaluation of the project's potential transportation impacts and identification of mitigation measures. Specific topics included identifying existing traffic levels and transportation infrastructure, impacts of the project on both, potential increases in traffic accidents, additional maintenance, and minimization of traffic impacts.

Public Services and Utilities (2)

Comments requested that the plant be designed to be expandable to accommodate future growth.

Alternatives (68)

Most comments on alternatives concerned alternative treatment technologies, discharge methods, or locations for elements of the proposal (e.g., treatment plant, discharges). Other comments addressed a range of other topics.

Regarding treatment technologies, some comments asked for descriptions of the proposed technologies and of proposed biosolids treatment and applications methods. Other comments requested that the EIS discuss technologies that cost less, save land and keep the Snoqualmie River clean as well as technologies that provide for upgrades in case of future wastewater technology improvements. Some comments specifically requested evaluation of tertiary treatment.

Regarding alternative discharge methods, some comments called for the evaluation of discharging into ponds at the concrete plant site; irrigation of agricultural lands, parks, lawns or other open-space lands; adding graywater areas at outfall sites; or using less land area for upland

discharge. Some comments questioned the viability of upland discharge based on cost and required land area. One comment asked whether the Snoqualmie River meets depth requirements at the river outfall site.

Regarding alternative locations, some comments requested consideration of discharge into the closest river (Snoqualmie or Tolt), discharge as far north of Carnation as possible, discharge to wetlands in the Stillwater Wildlife Area, discharge to constructed wetlands and discharge by gravity to the north instead of by pumping to the upland discharge area. Other comments simply requested consideration of more discharge locations. One comment called for a plant site that would minimize traffic impacts.

The remaining comments requested consideration of shorter conveyance pipeline routes, a no-action alternative, improvements to onsite wastewater treatment, need for the proposed project, wastewater treatment for the downtown area only, combining the treatment plant and collection system SEPA reviews, and keeping all facilities inside the Carnation city limits.

Comments that Fall Outside the Scope of the EIS (37)

These comments raised issues of concern to citizens, agencies and decision-makers that are not within the scope of this SEPA review. Economic issues, including cost and property value impacts were foremost among these. Other comments included requests to explain how the urban growth boundary has been evaluated, requests for sewer hookups for individuals located outside the service area who could be impacted by the project, and requests to evaluate the impacts of growth. These issues will need to be addressed outside the Carnation Wastewater Treatment Facility EIS process.