



City of Kenmore - 18120 68th Avenue NE - Kenmore, WA 98028
Phone: 425-398-8900 - E-mail: cityhall@kenmorewa.gov

City of Kenmore
City Council Special Meeting Agenda
7:00 p.m., Monday, February 3, 2020
Kenmore City Hall, Council Chambers
18120 68th Ave. NE, Kenmore, WA 98028

If you have any questions or to confirm agenda items prior to the meeting, or if you require special accommodations, please call the City Clerk at 425-398-8900. You may also stop by City Hall at 18120 68th Avenue NE, Kenmore. Council agendas are also available on our website at www.kenmorewa.gov.

I. 7:00 p.m. - CALL SPECIAL MEETING TO ORDER

II. ROLL CALL

III. FLAG SALUTE

IV. AGENDA APPROVAL

V. BUSINESS AGENDA

- A. Status Update on the Environmental Impact Statement (EIS) Process for the St. Edward Ballfield Project and Options for Next Step - Debbie Bent, Community Development Director and Bryan Hampson, Development Services Director
[Agenda Item](#)
- B. Citizen Comments on the EIS Process for the St. Edward Ballfield Project
This is an opportunity for the public to express their views on this issue. Please limit your comments to three (3) minutes.
- C. Council Discussion and Possible Direction on the EIS Process for the St. Edward Ballfield Project

VI. STAFF REPORT

VII. COUNCILMEMBER REPORTS, COMMENTS & INITIATIVES

VIII. ADJOURNMENT



Business of the City Council
City of Kenmore, WA

Subject/Topic: Status update on the EIS process for the St. Edward Ballfield Project and options for next steps Proposed Council Action/Motion: Review options for next steps and motion providing direction on selected option	For Council Meeting Agenda of: <u>2/3/20</u> Department: <u>Community Development and Development Services</u> Prepared by: <u>Debbie Bent, Community Development Director and Bryan Hampson, Development Services Director</u> Initial & Date Approved by Department Head: <u>DB 1/23/20</u> Approved by City Attorney: <u>[Signature]</u> Approved by Finance Director: <u>[Signature]</u> Approved by City Manager: <u>[Signature]</u> Exhibits/Attachments: 1. Contract 19-2061 Interagency Agreement with Amendments #1 and #2. 2. Contract 19-2062 SEPA Lead Agency Agreement 3. EIS scoping summary dated 10/31/19 4. Draft scope and budget for Phase 2 of the EIS for State Parks consultant (Watershed Company)
At the January 2020 Council retreat, staff noted that State Parks had recently completed the Phase 1 scoping process for the SEPA Environmental Impact Statement (EIS) process for the St. Edward ballfield project. The purpose of scoping was to narrow the focus of the EIS analysis to significant environmental issues and to identify reasonable alternatives, including mitigation measures. Scoping also invites public participation. Attachment #3 is the EIS Scoping Summary Report. The conclusion of Phase 1 scoping provides an opportunity for Council to consider options prior to authorizing further expenditures for Phase 2 related to the EIS. Before proceeding with Phase 2 of the EIS (draft EIS and final EIS), staff is requesting Council direction on potential options. Council concurred with the City Manager's recommendation to hold a special meeting February 3rd to allow public comment, review potential options and provide Council direction. Potential Options: At the Council retreat, staff outlined three potential options. No direction on potential options was requested by staff or given by Council at the Council retreat 1. Continue with the EIS process: Continuing with the EIS process is consistent with Council direction given May 2018. The outcome of the EIS SEPA process will help inform the City's decision on the critical area buffer variance permit application and the State Park Commission's decision on a long-term 20-year lease with the City to allow ballfield improvements and ongoing maintenance. The SEPA scoping document also notes that the EIS is not the only document that State Parks decision makers (State Parks Commission and staff) will consider and that other information sources like written comments received during the EIS scoping document will also be considered.	

Continuing with the EIS will require an additional estimated \$131,747 of city funds to be allocated to the current park capital improvement budget of \$200k (total budget \$331,747). Council direction on an amended CIP budget would be brought forward at a future meeting. Council direction at a future meeting will also be required to authorize a new Interagency Agreement with State Parks outlining the cost and terms for reimbursement of Phase 2 EIS costs.

2. **Reduce the number of alternatives considered in the EIS:** Reducing the number of alternatives is not anticipated to significantly reduce the cost for EIS Phase 2. The question for Council to consider is whether there is a preference for turf versus grass, or lighting versus no lighting to focus on for the EIS analysis. If Council selects this option, Council direction on alternatives is needed.

The preliminary list of alternatives outlined in the draft scoping summary (Attachment #3) are as follows:

- Artificial turf with field lighting
 - Artificial turf with no field lighting.
 - Improved natural turf with field lighting.
 - Improved natural turf with no field lighting.
 - No action – how the field is currently used (existing grass, no lighting)
3. **Stop the project.** The policy question for Council consideration: Are there other capital projects that have a higher priority for resource allocation, given anticipated project costs and no funding allocated in the six-year CIP for the ballfield project beyond the EIS.

Background on EIS Process:

- May 2018, Council direction to proceed with a SEPA EIS for the St. Edward Ballfield Project.
- 6/10/19 Council authorized approval of an Interagency Agreement Contract 19-2061 (see Attachment #1) for reimbursement of EIS Phase 1 costs to State Parks in the amount of \$65,105.
- 6/11/19 A SEPA lead agency agreement (Contract 19-2062) was executed designating State Parks as the SEPA lead agency for the EIS process (see Attachment #2).
- 7/31/19 state parks issued a SEPA Determination of Significance (DS).
- 8/13/19 State Parks hosted a public meeting on EIS scoping and held a public comment period 8/1/19 to 8/30/19.
- 9/9/19 Council authorized amendment #1 to the Interagency Agreement Contract 19-2062 in the amount of \$7,300 (total contact amount \$72,405)
- 11/13/19 State Parks provided a draft scoping summary document to the City outlining issues that need to be analyzed in the EIS. (see Attachment #3).
- 1/16/20 State Parks consultant (Watershed Company) provided a draft scope and budget for Phase 2 of the EIS process (see Attachment #4)
- 1/27/20 Council authorization for Amendment #2 to Contract 19-2061 in the amount of \$9,300 for Phase 1 EIS costs (total contract \$81,705).

Project Status: A Critical Area Buffer Variance Permit Application was submitted to the City on 7/28/17. The variance permit review process and decision are on hold pending the outcome of the SEPA EIS process. An updated Real Property Application was submitted to State Parks on 2/27/19 requesting a long-term lease. The State Parks Commission decision on the lease application is on hold pending the outcome the SEPA EIS process. On 11/9/15 Council direction to staff was to move forward with SEPA documents and work with State Parks to secure a long-term lease. On 1/22/16 a Memorandum of Understanding (Contract 16-C1507) was executed between the City and State Parks to prepare a long-term lease whereby the City improves the ballfields and manages and maintains them.

FISCAL CONSIDERATION:

Capital Improvement Budget: The adopted Park Capital Improvement Program (Ordinance 19-0497) allocates \$200k in 2019 for the EIS (REET funds and RCO grant funds) and \$500k as a placeholder in 2024 (park impact fee funds). The cost estimates to complete the EIS is now \$331,747. Additional City funds (\$131,747) will need to be allocated to the CIP budget in the current biennial budget to complete the EIS.

EIS Costs: \$331,747

Phase 1 (gap analysis and scoping): \$99,892

- Contract 19-2061 Interagency Agreement for reimbursement of Phase 1 EIS Consultant costs (Watershed Company) to State Parks \$81,705.
- Amendment #7 to Task 35 Contract 12-C1082 with Pertec \$18,187 (City's on call consultant) to respond to gap analysis questions from State Parks consultant

Phase 2 (draft and final EIS): \$231,855

- Staff received a scope and budget proposal from State Parks consultant (Watershed Company) on 1/16/20 for completing Phase 2. Cost not to exceed \$191,855.
- Staff anticipates that additional consultant resources will be needed to respond to questions, comments, data requests during the EIS process. Staff estimates \$40k.

Project Expenditures to Date: \$420,655 (includes Phase 1 EIS costs).

Estimated Project Costs: Project costs estimates were last provided to Council 7/23/18. Both cost estimates assumed \$300k for completing an EIS.

- Grass fields and no lighting: \$5,450,510.
- Turf fields with lighting: \$7,071,910.

Grant Status:

- 1/14/19 Council gave direction to pursue reallocation of the \$611k King County Youth grant funds from the St Edward ballfield project to the Rhododendron boathouse project. The reallocation is pending.
- 11/18/19 Council update on withdrawal from the RCO 2016 grant agreements for \$750k. Withdrawal due to the project being unable to meet grant requirements for completing the project by 2024, or securing tenure of the property by March 2020, and permitting and environmental review taking longer than anticipated. Grant funds are therefore no longer available to match City funds for EIS costs as anticipated in the adopted CIP.

COUNCIL GOAL/BUDGET OBJECTIVE BEING ADDRESSED: Continue to implement a Parks Improvement Plan, Council Goal #8. Complete the EIS based on Council direction May 2018 and allocated funds in the parks CIP.

Attachment 1

#19-C2061



**INTERAGENCY AGREEMENT
Between
WASHINGTON STATE PARKS AND RECREATION COMMISSION
And
CITY OF KENMORE**



AGREEMENT NO. IA 719-424

THIS AGREEMENT is made and entered into by and between the Washington State Parks and Recreation Commission, hereinafter referred to as "State Parks," and City of Kenmore, hereinafter referred to as the "City".

IT IS THE PURPOSE OF THIS AGREEMENT to have the City reimburse State Parks for an Environmental Impact Statement for the Saint Edward State Park – City of Kenmore Ballfields development proposal (EIS) in connection with the New SEPA Lead Agency Agreement between the City and State Parks Regarding the Proposed Ballfield Development at Saint Edward State Park.

THEREFORE, IT IS MUTUALLY AGREED THAT:

STATEMENT OF WORK

The City shall reimburse State Parks for the EIS work performed by The Watershed Company, State Parks contract # SC 719-302. The scope of work for the contract, also known as "first phase of the EIS process," is attached and made part of this Agreement as Exhibit A.

PERIOD OF PERFORMANCE

Subject to its other provisions, the period of performance of this Agreement shall commence on the date signed by State Parks and shall be completed on December 31, 2019, unless terminated sooner as provided herein. This Agreement shall automatically expire on December 31, 2019, unless otherwise extended by amendment.

PAYMENT

Reimbursement for the work provided in accordance with this Agreement is authorized by RCW 39.34.030 and 39.34.080. The parties have estimated that the cost of accomplishing the work will not exceed **Sixty-Five Thousand, One Hundred Five and No/100ths Dollars (\$65,105.00)**. Reimbursement for satisfactory performance of the work shall not exceed this amount unless the parties mutually agree to a higher amount prior to the commencement of any work which will cause the maximum payment to be exceeded.

BILLING PROCEDURE

State Parks shall submit invoices no more often than monthly. The reimbursement to State Parks for approved and completed work will be made by check by the City within 30 days of receipt of the invoice. Upon expiration of the contract, any claim for reimbursement not already made shall be submitted within 30 days after the expiration date or the end of the fiscal year, whichever is earlier. The invoices from State Parks shall include copies of The Watershed Company's invoices to State Parks that are the basis for the invoices to the City.

RECORDS MAINTENANCE

The parties to this Agreement shall each maintain books, records, documents and other evidence which sufficiently and properly reflect The Watershed Company charges, the invoices from State Parks and the reimbursement from the City for such. These records shall be subject to inspection, review or audit by personnel of both parties, other personnel duly authorized by either party, the Office of the State Auditor, and federal officials so authorized by law. All books, records, documents, and other material relevant to this Agreement will be retained for six years after expiration and the Office of the State Auditor, federal auditors, and any persons duly authorized by the parties shall have full access and the right to examine any of these materials during this period.

Records and other documents, in any medium, furnished by one party to this Agreement to the other party, will remain the property of the furnishing party, unless otherwise agreed.

INDEPENDENT CAPACITY

The employees or agents of each party who are engaged in the performance of this Agreement shall continue to be employees or agents of that party and shall not be considered for any purpose to be employees or agents of the other party.

AGREEMENT ALTERATIONS AND AMENDMENTS

This Agreement may be amended by mutual agreement of the parties. Such amendments shall not be binding unless they are in writing and signed by personnel authorized to bind each of the parties.

TERMINATION

Either party may terminate this Agreement upon 30 days' prior written notification to the other party. If this Agreement is so terminated, the parties shall be liable only for performance rendered or costs incurred in accordance with the terms of this Agreement prior to the effective date of termination.

INDEMNIFICATION

Each party shall be responsible for the actions and inactions of itself and its own officers, employees, and agents acting within the scope of their authority.

TERMINATION FOR CAUSE

If for any cause, either party does not fulfill in a timely and proper manner its obligations under this Agreement, or if either party violates any of these terms and conditions, the aggrieved party will give the other party written notice of such failure or violation. The responsible party will be given the opportunity to correct the violation or failure within fifteen (15) working days. If failure or violation is not corrected, this Agreement may be terminated immediately by written notice of the aggrieved party to the other.

DISPUTES

In the event that a dispute arises under this Agreement, it shall be determined by a dispute board

in the following manner: Each party to this Agreement shall appoint one member to the dispute board. The members so appointed shall jointly appoint an additional member to the dispute board. The dispute board shall review the facts and Agreement terms and applicable statutes and rules, and shall make a determination of the dispute. The determination of the dispute board shall be final and binding on the parties hereto.

GOVERNANCE

This Agreement is entered into pursuant to and under the authority granted by the laws of the State of Washington and any applicable federal laws. The provisions of this Agreement shall be construed to conform to those laws.

In the event of an inconsistency between the terms of this Agreement, the scope of work, and/or any applicable statute or rule, the inconsistency shall be resolved by giving precedence in the following order:

- a. applicable statute or rule;
- b. scope of work; and
- c. any other provisions of the Agreement, including materials incorporated by reference.

ASSIGNMENT

The work to be provided under this Agreement, and any claim arising thereunder, is not assignable or delegable by either party in whole or in part, without the express prior written consent of the other party, which consent shall not be unreasonably withheld.

WAIVER

A failure by either party to exercise its rights under this Agreement shall not preclude that party from subsequent exercise of such rights and shall not constitute a waiver of any other rights under this Agreement unless stated to be such in a writing signed by an authorized representative of the party and attached to the original Agreement.

SEVERABILITY

If any provision of this Agreement or any provision of any document incorporated by reference shall be held invalid, such invalidity shall not affect the other provisions of this Agreement which can be given effect without the invalid provision, if such remainder conforms to the requirements of applicable law and the fundamental purpose of this Agreement, and to this end the provisions of this Agreement are declared to be severable.

ALL WRITINGS CONTAINED HEREIN

This Agreement contains all the terms and conditions agreed upon by the parties. No other understandings, oral or otherwise, regarding the subject matter of this Agreement shall be deemed to exist or to bind any of the parties hereto.

PROJECT MANAGEMENT

The project representative for each of the parties shall be responsible for and shall be the contact

person for all communications and billings regarding the performance of this Agreement.

The Project Representative for City is: Bryan Hampson, Development Services Director, (425) 398-8900

The Project Representative for State Parks is: Jessica Logan, Environmental Planner 5, (360) 902-8679

IN WITNESS WHEREOF, the parties have executed this Agreement.

City of Kenmore

By: RJ Kelly

Title: City Manager

Date: 6-13-19

Washington State Parks and
Recreation Commission

By: Mark Johnson

Title: Chief Financial Officer

Date: 6/21/19

Approved As To Form:
William Van Hook
Asst. Attorney General
02/20/07

RECEIVED ON

JUN 20 2019

CONTRACTS AND
PROCUREMENT

EXHIBIT A**THE WATERSHED COMPANY
SCOPE OF WORK****SC 719-302**

This Scope of Work is limited to the first phase of the EIS process, Scoping and Refinement of Alternatives. Once this work is complete, costs will be applied to the tasks of completing the PDEIS, DEIS, and FEIS.

Scope of Services:

Phase 1. EIS Scoping and Refinement of Alternatives	\$45,175
1.1 Data gap analysis, base map, research	
1.2 Site visit with Washington State Parks (Client) and City of Kenmore (Applicant)	
1.3 EIS Scope Development	
1.4 Public Participation Approach	
1.5 Scoping Notice, Public Meeting/Open House/Workshop, and Scoping Report	
1.6 Refine Alternatives	
1.7 Develop/Coordinate Definitions of up to Five Levels of Impact	
Phase 5. EIS Consultant Team Coordination & Project Administration	\$17,920
5.1 Project development, management, coordination	
5.2 Invoicing and progress reports	
Phase 6. Expenses (mileage, copies, GPS, other)	\$2,010

Note: Phases 2, 3 and 4 to be authorized by future contract amendments.
Phases 5 and 6 to be expanded in future contract amendments, to support work performed in Phases 2, 3 and 4.

The total cost for Phases 1, 5, and 6 will not exceed **\$65,105**.

PHASE 1. EIS SCOPING AND REFINEMENT OF ALTERNATIVES

- 1.1 Data gap analysis, base map, and research.** The EIS consultant team will collect and review background information, assemble available mapping data, and identify additional data needs. Propose additional data collection and/or additional analysis to Parks if warranted.
- 1.2 Site Visit with Washington State Parks (Client) and City of Kenmore (Applicant).** The EIS consultant team will attend one site visit with State Parks and City representative(s) to review existing conditions and potential effects of the alternatives.
- 1.3 EIS Scope Development.** The EIS consultant team will develop a preliminary scope for the EIS based on project understanding and available information. The EIS consultant team will attend one EIS scope development meeting with State Parks and City of Kenmore representatives (in-person or via conference call) to confirm the EIS preparation process. The public participation process to be led by State Parks will also be defined during this task. Preliminary alternatives will be defined for inclusion in the EIS scoping

notice. It is our understanding at this time that these will include those listed below (or similar). The EIS consultant team will discuss with State Parks during this task whether a preferred alternative will be described at this time, or later in the EIS process.

- Field lighting with artificial turf
- No field lighting with artificial turf
- Field lighting with an improved natural turf field
- No field lighting with an improved natural turf field
- No action – how the field is used now (no lighting, existing grass)

1.4 Public Participation Approach. The EIS consultant team will assist State Parks with developing a robust public participation approach that will include opportunities for review and comment on the alternatives, as well as review and comment on the elements of the environment to be addressed in the EIS. The approach may include development of a formal public participation plan to specify outreach methods (e.g. postcards, meetings, website) and a preliminary schedule for the EIS process.

1.5 Scoping Notice, Public Meeting/Open House/Workshop, and Scoping Report.

- Prepare a draft Scoping Notice for review and use by State Parks. Include a list of preliminary alternatives to be considered and the list of elements of the environment to be addressed in the EIS.
- *Review and comment on presentation materials developed by State Parks and attend one public meeting during the EIS scoping process. The EIS consultant team will prepare notes for use by State Parks and City of Kenmore following the public meeting.*
- Optional: Prepare a Scoping Report summarizing the EIS scoping process and comments received, as well as how these comments will be used in the SEPA process.

1.6 Refine Alternatives. Participate in one meeting with State Parks and City of Kenmore to refine project alternatives (if appropriate) based on input received during the EIS scoping process. Confirm whether additional discipline reports are needed based on scoping comments received and final definition of the alternatives to be evaluated in the EIS.

1.7 Develop Definitions for up to Five Levels of Impact. Draft language will be developed to aid the consultant team in analyzing the issues consistently. Includes team coordination and communication with the goal of agreement on what constitutes a significant impact and what constitutes reasonable mitigation before proceeding to Phase 2. Includes one round of review and revision if necessary.

Work Products:

- One Draft Scoping Notice *for use by State Parks and City of Kenmore.*
- Public meeting summary notes (one meeting, one version).
- Scoping Report (one version) that captures both public comments and refinements to project alternatives/refinements to the EIS analysis (if any) developed at the follow-up meeting with State Parks and City of Kenmore.
- Definitions for up to five levels of impact (one revision).

5. EIS Consultant Team Coordination and Project Administration

5.1 Project management and coordination. *This task assumes 1.5 hours per week for up to 4 months from Notice-to-Proceed for the Phase 1 work.*

5.2 Invoicing and progress reports. *This task assumes monthly invoices and brief 1-2 page progress reports for up to 4 months from Notice-to-Proceed for the Phase 1 work.*

Assumptions for overall EIS process:

- The overarching assumption is that site-specific technical studies have been completed and provide adequate information to summarize in the EIS with only additional qualitative analysis. If additional studies are determined to be necessary, State Parks will decide whom shall prepare these. If the EIS consultant team is tasked with preparing additional technical studies, this would fall outside of this scope, budget, and preliminary schedule.
- It is assumed that State Parks will lead the public participation process and maintain the website for the Saint Edward Park/City of Kenmore Athletic Fields EIS. The EIS consultant team will support the public participation process through reviewing and commenting on presentation materials developed by State Parks; participating in one public scoping meeting/open house/workshop; one public meeting/open house/workshop during the Draft EIS comment period; and providing one summary for each of these meetings of the discussion and comments received.
- *Comments from State Parks and City of Kenmore on each deliverable will be compiled by State Parks into a single document for delivery to the consultant team.*
- Cost estimate assumes receipt of approximately 100 written public comments on the DEIS (letters or email communication), identifying an average of five issues each.
- Preparation of more than one PDEIS and/or PFEIS for internal review by State Parks/City of Kenmore can be accommodated, provided that the EIS consultant team receives authorization for additional budget and extension of the preliminary schedule.
- If formal public hearings become necessary, participation by members of the EIS consultant team would be contracted separately.
- This scope of work and cost estimate may be affected by factors unknown at this time that may arise in response to public or agency comments or requests at any stage of EIS preparation.
- Time may be transferred from one task to another due to greater or lesser level of effort, provided that each task shall be completed and the total budget shall not be exceeded.
- This proposal includes general coordination with State Parks via email and phone. In-person meetings beyond those specified above are not included. Additional coordination can be added if necessary, under a separate agreement.



Don Hoch, Director



City of Kenmore Contract No. 19-C2061

STATE OF WASHINGTON
WASHINGTON STATE PARKS AND RECREATION COMMISSION

1111 Israel Road SW • PO Box 42650 • Olympia, WA 98504-2650 • (360) 902-8500
Internet Address: <http://www.parks.wa.gov>

July 30, 2019

Bryan Hampson
Development Services Director
City of Kenmore
18120 68th Ave NE
Kenmore WA 98028-2701

Re: Agreement No. IA 719-424 – Saint Edward State Park – Kenmore Ballfield EIS – Amendment No. One (1)

Dear Mr. Hampson:

Due to our request for additional environmental consulting services from the Watershed Company, State Parks hereby *modifies* the above agreement as follows:

EXHIBIT A - SCOPE OF WORK

Add the following task to Phase 1. EIS Scoping and Refinement of Alternatives:

1.8 Prepare information and graphics to be presented at the Open House scheduled for August 13, 2019. Eight (8) 36" x 48" boards are planned on the following topics:

- Site overview & ecological context
- Ballfield lighting information
- Synthetic turf information
- Stormwater management information
- Parking information
- Proposed schedule of ballfield play times
- EIS process board
- List of environmental elements

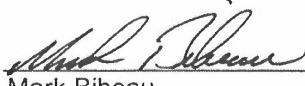
Draft boards and graphics will be presented to State Parks; one round of revisions to the boards will be made following the review. It is anticipated that two sets of boards (16 total) plus one public comment sheet (400 copies) will be provided for the Open House.

COMPENSATION

Compensation for the additional work shall not exceed Seven Thousand Three Hundred and No/100 Dollars (\$7,300.00) Total compensation payable to Consultant for satisfactory performance of the work under this contract shall not exceed **Seventy-Two Thousand Four Hundred Five and No/100 Dollars (\$72,405.00).**



City of Kenmore



Mark Bibeau
Chief Financial Officer, State Parks

9/12/19

Date

9/19/19

Date

wk

cc: Lis Lantz, Approval Supervisor
Jessica Logan, Project Representative
Fiscal

RECEIVED ON

SEP 18 2019

CONTRACTS AND
PROCUREMENT



SCIENCE & DESIGN

Exhibit C

November 25, 2019

Bryan Hampson, Development Services Director
18120 68th Ave NE
Kenmore, WA 98028
Via email: bhampson@kenmorewa.gov

Re: Proposal for Environmental Consulting Services
Saint Edward State Park / City of Kenmore Athletic Fields EIS
The Watershed Company Reference Number: 180908

Dear Bryan:

Thank you for requesting additional description of the services listed in our October 9, 2019 proposal. As we discussed, these tasks were beyond the original scope of work for Phase 1 of the Saint Edward State Park/City of Kenmore Ballfield Improvements EIS.

Scope of Services:

Phase 1. EIS Scoping and Refinement of Alternatives, additional services:

- Produced additional materials for open house, and provided additional staffing at prep meeting and public open house. **\$2,200**
Item 1.5, 2nd bullet in the original Scope of Work stated, "Review and comment on presentation materials developed by State Parks..." The project team (State Parks, City, EIS consultants) decided in July to have us produce display boards for the public meeting and we were given a contract amendment of \$7,300 to do this. Later as we prepared for the open house, the group decided we needed additional boards which required more graphic and production support to create the display boards and staff the open house.

- Researched status of previous critical areas variance application, documents and revision sequences, and recent City code changes. **\$1,800**

This task was not included in the original contract as we were not aware of the numerous versions of the variance applications, review cycles including third party reviews, City and consultant responses, wetland rating discrepancies, supporting documents, and revisions that had occurred. This task also included reviewing City code changes to formulate conclusions about additional information needed to proceed with the EIS.

- Researched status and sequence of State Parks plans and policy statements. **\$700**

This work included researching and unraveling past and present State Parks plans, policy statements, and Commission meeting notes, to consider their relative precedence for the preliminary EIS scope and to formulate conclusions about additional information needed to proceed with the EIS.

- Condensed, compiled, categorized over 130 pages of public comments, for inclusion in the Scoping Report and to help inform the scope of analysis for the EIS. **\$2,500**

State Parks staff transcribed the public comments as was planned. Once we received the comments and started to formulate our approach to the Scoping Report, we decided to condense and categorize the comments in order to organize the details around the issues raised. The distilled comments were presented in the Scoping Report for each element of the environment, the alternatives, general opposition, and general support. This approach was more time-consuming but resulted in a more comprehensive and useful synopsis for decision making and moving forward. The original Scope of Work envisioned a fairly simple Scoping Report with a summary of the public process and listing of the elements of the environments to be addressed in the EIS.

- Additional coordination between the EIS consultant team, State Parks, and City of Kenmore to clarify and document project history, available information, data needs for alternatives analysis, purpose/objectives statement, and approach to moving forward. **\$2,100**

This work exceeded the number of hours originally budgeted. Each planned meeting with the overall project team was 1-2 hours longer than anticipated. Additional follow-up with all team members was necessary to create document review summaries, the data gap list, and the EIS Scoping Report described above.

The cost for these additional services was **\$9,300.**

*Environmental Consulting Services Proposal
Hampson, B.
November 25, 2019
Page 3*

Thank you again for the opportunity to work on this project. Please call if you have any questions or if we can provide additional information.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Creveling". The signature is written in dark ink and is positioned above the printed name and title.

Jennifer Creveling
Principal / Senior Biologist

Attachment 2

#19-02062

NEW SEPA LEAD AGENCY AGREEMENT
BETWEEN
THE CITY OF KENMORE
And
WASHINGTON STATE PARKS
Regarding the
PROPOSED BALL FIELD DEVELOPMENT IN SAINT EDWARD STATE PARK

I. PARTIES

This New SEPA Lead Agency Agreement ("SEPA Agreement") is entered into by the City of Kenmore ("City") and Washington State Parks and Recreation Commission ("State Parks"), collectively, the "Parties", pursuant to WAC 197-11-944.

II. PURPOSE, BACKGROUND AND PRIOR AGREEMENT

The purpose of this SEPA Agreement is to assign lead agency responsibilities under the State Environmental Policy Act ("SEPA"), chapter 43.21C RCW, and its implementing regulations, chapter 197-11 WAC, for the proposal described below which will be located on State Parks' property. Implementation of the proposal will require (1) a lease from the State Parks Commission ("Parks Commission," which, as used herein, refers specifically to the commission created by RCW 79A.05.015), and (2) a critical area buffer width variance and development permits from the City (collectively, the "SEPA Actions").

Saint Edward State Park is a 316-acre day use park that was formerly a Catholic Seminary. The Seminary and associated grounds are listed on the National Register of Historic Places. In addition to the Seminary buildings, Saint Edward State Park has 3,000 feet of freshwater shoreline on Lake Washington, numerous trails for hiking and biking, open space areas for recreating, ballfields, and various other active and passive recreational amenities.

The City proposes to lease and modify the existing ballfields that are located just east of the Seminary buildings at approximately 14445 Juanita Drive NE. A copy of the City's draft design for the ballfield proposal dated February 27, 2019, is attached to this SEPA Agreement as **Exhibit A** and incorporated by reference ("Proposal"). The Proposal may include elements such as resurfacing the two existing ballfields with artificial turf and an overlay of two soccer fields and a cricket field. The Proposal may also include the addition of LED field lighting, modification to existing parking, addition of new parking, wetland and buffer mitigation, upgrades to the existing restroom, and addition of covered bleachers, covered dugouts, backstops, fencing, pathway around the ballfields and landscaping. The Proposal does not include any modifications to any area other than the ballfields and nearby parking areas, and specifically does not include the historic Seminary buildings, shoreline, trails, picnic areas, "big toy" playground, horse shoe pits, volleyball area, or roads. Implementation of the Proposal is contingent upon Parks Commission's approval of the City's request for a lease and the outcome of the SEPA review. The City intends to request a lease from State Parks that will authorize the City to maintain, use, and schedule use of the ballfields for a minimum of 20 years.

1

City of Kenmore and State Parks
Revised SEPA Lead Agency Agreement for
Saint Edward State Park Ball Field Proposal

The Parties entered into a SEPA Lead Agency Agreement regarding the Proposal in June 2016. This New SEPA Lead Agency Agreement replaces the 2016 Agreement on the date described in Section V.E below.

III. AGREEMENT

A. Full Cooperation and Coordination

1. The Parties shall work together to ensure consistency and coordination in the development and preparation of SEPA documents necessary for adequate review of the Proposal, including but not limited to the environmental checklist, the determination of significance ("DS"), the draft environmental impact statement ("DEIS") and final environmental impact statement ("EIS") as required below ("SEPA Documents").

2. The Parties shall work together to involve any other local, state, federal, or tribal agencies and interested parties in the preparation and review of the SEPA Documents to ensure a transparent and public process.

3. The Parties shall work together to identify, as far in advance as possible, actions or problems that might affect SEPA review and the SEPA Documents.

B. General Duties

1. State Parks shall act as nominal lead agency for the Proposal and the SEPA Actions pursuant to WAC 197-11-926 and -944. The Parties agree that State Parks will apply Chapter 352-11 WAC, titled "SEPA Procedures," to State Parks' review of the Proposal and the SEPA Actions, pursuant to the following terms and conditions:

- i. WAC 352-11-020: There is no administrative appeal within State Parks of any SEPA determinations made by State Parks or the SEPA responsible official.
- ii. WAC 352-11-040: The "decision maker" is Jessica Logan, Environmental Program Manager, as delegated by the State Parks Director.
- iii. WAC 352-11-055: The SEPA responsible official has determined that the Proposal and SEPA Actions are not categorically exempt from SEPA.
- iv. WAC 352-11-055 and 352-11-330: The City has submitted an environmental checklist, which the City does not need to revise or supplement. State Parks and the SEPA Responsible Official have determined that the Proposal and SEPA Actions may have a probable significant adverse environmental impact, requiring the SEPA Responsible Official to issue a DS, carry out scoping, and prepare an EIS.
- v. WAC 352-11-350: Does not apply.
- vi. WAC 352-11-420: State Parks will use an outside consultant to assist in the preparation of the EIS pursuant to the terms of Section III.B.3 below.
- vii. WAC 352-11-420: If State Parks requests the City to provide information related to the EIS, and the City does not possess such information, or it does not exist, State Parks and the City must discuss the purpose, relevancy and necessity of such information. If the Parties agree that such information is relevant and necessary for the EIS, the City must obtain or create such information at its own cost and expense;

provided, that if the estimated cost to the City is beyond the City's budget, the City may decide not to obtain or create such information. In the absence of such information, State Parks may decide that it cannot complete an adequate review of the Proposal and therefore must terminate the SEPA review process for the Proposal and the SEPA Actions. State Parks must advise the City in writing of its preliminary decision to terminate the SEPA review process at least 30 days before making its final decision.

viii. WAC 352-11-510: State Parks must notify the City of the methods and contents of public notices at least 21 days prior to issuance of the notices.

ix. WAC 352-11-665: Upon request of the City during the EIS preparation process, but at least 30 days before issuance of the DEIS, State Parks must provide to the City all policies, plans, rules or regulations of State Parks that State Parks may or will consider as substantive authority to mitigate environmental impacts of the Proposal or SEPA Actions, or to condition or deny the Proposal or SEPA Actions.

x. WAC 352-11-910: The SEPA responsible official is Jessica Logan, Environmental Program Manager, as delegated by the Director of State Parks.

2. If the City receives written comments regarding the scope, reasonable alternatives or contents of the DEIS, the City shall promptly forward copies of the comments to State Parks.

3. The City acknowledges that State Parks will use The Watershed Company, an outside consultant, to assist in preparation of the EIS ("EIS Consultant"). State Parks has supplied the City with the EIS Consultant's qualifications. As of the date described in Section V.E below, the EIS Consultant's services are divided into 6 phases (Phase 1: EIS scoping and refinement of alternatives (\$45,175 cost estimate); Phase 2: preparation of preliminary DEIS; Phase 3: preparation of DEIS ; Phase 4: preparation of EIS; Phase 5: coordination and administration by EIS Consultant team (\$17,920 cost estimate for Phase 1); and Phase 6: charge for expenses (\$2,010 cost estimate for Phase 1)). After the EIS Consultant completes Phase 1 services, State Parks shall notify the City of such completion and the EIS Consultant's charges for such services, together with the EIS Consultant's estimate of charges for Phase 2 services (the cost estimate for Phase 2 services are undetermined as of the date described in Section V.E below). After receiving this notice, the City may, in its sole discretion, direct State Parks to terminate preparation of the EIS and SEPA environmental review for the Proposal and SEPA Actions.

4. State Parks shall provide the City with all drafts of the preliminary DEIS, DEIS, preliminary EIS and EIS at least 45 days prior to issuance, and will provide the City with an opportunity to comment on the documents before issuing them.

5. As nominal lead agency, State Parks shall be responsible for ensuring compliance with SEPA's public notice, comment, and hearing requirements. WAC 197-11-502, 197-11-510, and 197-11-535; WAC 352-11-510.

6. The City shall be solely responsible for ensuring compliance with its comprehensive plan and development regulations.

7. In all other respects, the Parties shall act as partners in meeting State Parks' responsibilities as SEPA nominal lead agency.

C. EIS Schedule

1. State Parks shall use its best efforts to issue the DEIS by December 31, 2019 and the EIS by March 31, 2020.

IV. DECISION MAKING AND DISPUTE RESOLUTION

A. The Parties agree to attempt to make decisions by consensus throughout the SEPA process in regard to issuance of the DS and the scope, content, and timing of the DEIS and EIS. The Parties recognize that the EIS must contain sufficient environmental analysis for informed decision-making of all agencies with jurisdiction. Therefore, information regarding areas of environmental concern and potential mitigation suggested by either Party shall be included in the document(s).

B. If the Parties cannot agree on any aspect of the SEPA process or the SEPA Documents, they should use their best efforts to agree upon a dispute resolution process and carry out the process in a timely manner. If any dispute resolution is unsuccessful, the Parties may agree to terminate this SEPA Agreement pursuant to the process in Section V.F. below. State Parks will not be required to compensate the City for any funds it received from the City for the services of the EIS Consultant.

C. If this SEPA Agreement is terminated, each Party will assume lead agency responsibility for the SEPA Actions under that Party's jurisdiction pursuant to WAC 197-11-922 through 938.

D. If there is an appeal to the courts of any decision or action pursuant to this SEPA Agreement, each Party shall be responsible for its own attorneys' fees and costs to defend or prosecute the appeal, and each Party retains the right to participate in the appeal at its own cost and expense.

V. OTHER PROVISIONS

A. Except as provided in this SEPA Agreement, nothing in this SEPA Agreement shall be construed as limiting or affecting in any way the authority or legal responsibilities of either Party. This SEPA Agreement is not intended to affect environmental review previously conducted by State Parks, or any separate proposal regarding development of Saint Edward State Park or the Seminary buildings.

B. Nothing in this SEPA Agreement binds the Parties to perform beyond their respective authorities.

C. Nothing in this SEPA Agreement requires the Parties to assume or expend funds in excess of available appropriations, authorized by law. Specific activities that are not addressed by this SEPA Agreement but involve the transfer of money, services, or property between the Parties, shall require execution of separate agreements or contracts.

D. Amendments to this SEPA Agreement are effective upon written approval of the Parties.

E. This SEPA Agreement shall become effective upon signature by both Parties. This SEPA Agreement may be executed in counterparts, each of which will be considered an original document.

F. Either Party may terminate this SEPA Agreement after compliance with the dispute resolution procedure in Section IV.B. above. Written notification of termination will be effective 30 days after receipt of the written notice. Termination of this SEPA Agreement will occur immediately after completion of the EIS or withdrawal of the Proposal by the City.

G. The following persons shall be the designated contact for all communications regarding this SEPA Agreement. The contact person may be updated by written notice.

CITY OF KENMORE

Bryan Hampson
Development Services Director
18120 68th Avenue NE
Kenmore, WA 98028
(425) 398-8900
BHampson@kenmorewa.gov

STATE PARKS

Jessica Logan
Parks Development
1111 Israel Road SW
Tumwater, WA 98504
(360) 902-8679
Jessica.Logan@parks.wa.gov

H. This SEPA Agreement shall be construed and interpreted in accordance with the laws of the State of Washington. The venue of any action brought to enforce this SEPA Agreement shall be in the Superior Court for Thurston County, or the Superior Court for King County if agreed to by the Parties.

This SEPA Agreement is executed by the persons signing below, who warrant they have the authority to execute this SEPA Agreement.

CITY OF KENMORE


Rob Karlinsky
City Manager

Date: 6-11-19

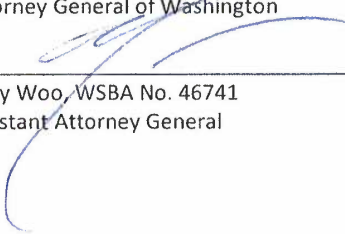
WASHINGTON STATE PARKS


Peter Herzog
Assistant Director, Parks Development

Date: 6/11/19

Approved as to form:

By: 
Dawn Reitan, WSBA No. 23148
City of Kenmore Attorney

Robert W. Ferguson
Attorney General of Washington
By: 
Andy Woo, WSBA No. 46741
Assistant Attorney General

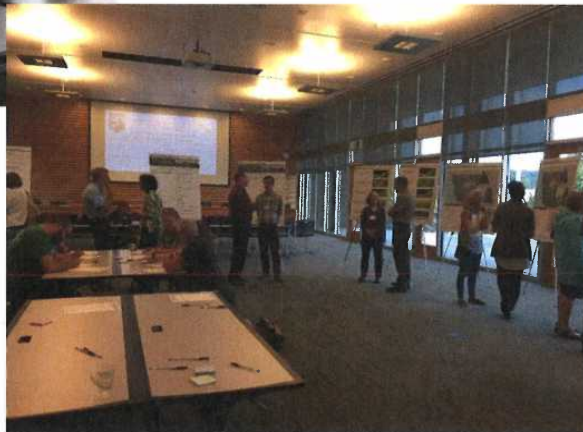
City of Kenmore and State Parks
Revised SEPA Lead Agency Agreement for
Saint Edward State Park Ball Field Proposal

Attachment 3

EIS Scoping Summary

SAINT EDWARD STATE PARK/CITY OF KENMORE BALLFIELD IMPROVEMENTS

October 31, 2019



Prepared for: Washington State Parks & Recreation Commission

Prepared by: The Watershed Company | Vicki Morris Consulting Services

Project consultants: The Watershed Company | Herrera, Inc. | Robert W. Droll, Landscape Architect, PS | Vicki Morris Consulting Services

Cover images: Public EIS scoping meeting, Kenmore City Hall, August 13, 2019

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Appendix A

EIS Public Scoping Meeting Summary

Appendix B

SESP Land Classification & Long-Term Boundary Map

Appendix C

EIS Public Scoping Meeting Comments

Appendix D

Redacted EIS Scoping Comments

1 Background & Purpose

Saint Edward State Park, owned by the Washington State Parks and Recreation Commission (State Parks), includes an existing ballfield. The existing ballfield has been in organized recreational use since before State Parks purchased the Saint Edward Seminary site from the Roman Catholic Archdiocese in 1977.

The City of Kenmore (City) proposes to lease and renovate the existing grass ballfield area to create an improved public sports field designed to accommodate two little league fields, two youth soccer fields, or one full-size soccer field, as well as other possible sports fields (e.g., cricket, rugby, lacrosse). The proposal includes perimeter field lighting, a porous concrete walking path, backstops, dugouts, covered bleachers and additional parking.

The City originally requested a lease from State Parks in 2015. During the environmental review for that request, issues raised about impacts to the natural environment, traffic, parking, and recreation led both State Parks and the Kenmore City Council to decide that an Environmental Impact Statement (EIS) would be needed, in accordance with the State Environmental Policy Act (SEPA). A Memorandum of Understanding between the City and State Parks (executed June 11, 2019) identifies State Parks as the SEPA “lead agency” for the EIS process. As the SEPA lead agency, State Parks has the primary responsibility for complying with the procedural requirements of SEPA.

The first step in the EIS process is “scoping.” The purpose of scoping is to narrow the focus of the EIS analysis to significant environmental issues and to identify reasonable alternatives, including mitigation measures (Washington Administrative Code [WAC] 197-11-408). Scoping also notifies the public and other agencies that an EIS is being prepared and invites their participation.

This document summarizes the EIS scoping process for the Saint Edward State Park/City of Kenmore Ballfield Improvements proposal. The bulk of this document is a summary of the comments received during the scoping process (Section 4).

2 Objectives of the Proposal

City objectives for the proposal are as follows:

- Provide a multi-use sports field for youth and adult organized sports within the City, as well as opportunities for informal unscheduled play, consistent with City Parks, Recreation and Opens Space Plan policies (2013).

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- Provide fields for all-season use for soccer, baseball, and other possible field sports (e.g., cricket, rugby, lacrosse) to meet demand for youth leagues identified in the Ballfield Supply and Demand Analysis (updated January 2018).
- Renovate ballfields within the existing footprint of the natural turf field.
- Implement preferred improvements to maximize hours and months of athletic field use; e.g., artificial turf with field lighting.
- Enter into a long-term lease with State Parks to construct, manage and maintain improvements to the Saint Edward State Park ballfields.

3 Summary of Public Involvement

Following is a summary of public involvement during the EIS process to date. Public involvement in the proposal prior to the initiation of the EIS process is not included in this summary, but will be taken into consideration by State Parks and the City.

- **Issuance of Determination of Significance (DS) and Request for Comments on the Scope of EIS.** The DS and Request for Comments on the Scope of the EIS was issued by State Parks on August 1, 2019. To inform the public of the DS, notice was given at Saint Edward State Park, in The Seattle Times, and on State Parks' website.
- **EIS Scoping Comment Period.** A 30-day comment period for public input to the scope of the EIS was provided between August 1, 2019 and August 30, 2019. During this time period, written comments were submitted to State Parks via mail or email.
- **EIS Public Scoping Meeting.** As an additional means to provide information and receive public comments, an open house meeting was held on Tuesday, August 13, 2019 from 6:00 to 8:00pm at Kenmore City Hall. See Appendix A for a summary of the meeting.

As the EIS process moves forward, additional opportunities for public involvement will be available. Key opportunities include:

- **Draft EIS Comment Period.** Upon issuance of the Draft EIS, a second 30-day comment period will be provided for the public to review and comment on the Draft EIS.
- **Agency Decision.** After issuance of the Final EIS, the public will have opportunity to provide comments to State Parks during the agency's decision-making process.

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4 Summary of Public Comments Received

State Parks transcribed comments submitted during the EIS scoping comment period in two documents, both of which are included as appendices of this report (these documents have also been posted to State Parks' website for the proposal):

- Comments submitted on forms provided at the August 13 EIS public scoping meeting (15 pages, Appendix C).
- A redacted summary of comments received on State Parks' website during the EIS scoping comment period (116 pages, Appendix D). Comments have been redacted to omit personal information.

The comments in these two documents range from general in nature, to specific regarding support for, or opposition to, the City's proposal. Several of the comments express concern regarding environmental impacts in relation to specific elements of the environment, some express a preference for which alternative should be approved by State Parks, and others identify social justice concerns and impacts to environmental education opportunities in the park. State Parks decision makers will consider issues not covered by the EIS by reviewing information sources like the written comments received during the EIS scoping comment period.¹

The remainder of this section summarizes the comments in the two documents and is organized into the following four parts:

- Subsection 4.1, Comments Regarding Elements of the Environment to be Evaluated in the EIS;
- Subsection 4.2, Comments Regarding the Alternatives to be Evaluated in the EIS;
- Subsection 4.3, General Comments: Opposed; and
- Subsection 4.4, General Comments: Support.

Organization of the comments in this manner will help inform the scope of the analysis in the EIS, following the content outline in the SEPA rules (WAC 197-11-440 and -444). Where comments or issues are similar, they have been consolidated and only listed once. The complete

¹ Per WAC 197-11-448(1), "... the environmental impact statement 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 the decision makers. Rather, an EIS analyzes *environmental* impacts and must be used by agency decision makers, along with other relevant considerations or documents, in making final decisions on a proposal. The EIS provides a basis upon which the responsible agency and officials can make the balancing judgment mandated by SEPA, because it provides information on the environmental costs and impacts. SEPA does not require that an EIS be an agency's only decision making document."

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record of comments is provided in Appendices C and D of this report (and on State Parks' website for the proposal).

Comment summary statements in Subsections 4.1 through 4.4 of this document include language from the original comments submitted to State Parks. Comment summary statements may not necessarily be factually correct.²

4.1 Comments Regarding Elements of the Environment to be Evaluated in the EIS

4.1.1 Earth / Earthwork / Soils

- How far would the field infill material travel? Would it enter the forest and damage the forest ecosystem?
- How often would the infill material need to be replaced? What machinery would be used? Would this material be reused elsewhere? If not, would there be off-site environmental impacts where it is disposed?
- Is it possible that contaminants in runoff from the turf field could end up deposited on sediments along the Lake Washington shoreline where beach play occurs?
- Please describe the plan to replicate the natural groundwater flow into the stream so as to avoid excess erosion or drought.

4.1.2 Air Quality

- Construction is proposed during summer months, which is when all the camps use the site. There is extensive research on the impact of diesel exhaust and the air quality impacts of heavy equipment (including dust) on sensitive populations like small children.
- Please describe the maintenance procedure for artificial turf. Would it be brushed? Would a machine fueled by gasoline be used for this maintenance?
- Increased traffic associated with the coming and going of little league traffic would add to carbon monoxide and particulate emissions, both in the park and in surrounding neighborhoods.

² For example, concerns about potential effects from artificial turf made with tire crumb rubber infill are not applicable since the City's proposal specifically excludes use of this material. A new generation of certified lead-free synthetic turf and inert fill material (silica sand) would be installed. SEPA Checklist (February 2018) Section B.7.a (Environmental Health), page 24.

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4.1.3 Climate Change / Carbon Footprint / Loss of Carbon Sequestration³

- What will this plan do to work against global warming?
- An accounting of the carbon costs associated with the proposed development should be part of the DEIS:
 - Loss of carbon sequestration if the existing grass field is removed.
 - Carbon cost of production, installation, operation, maintenance (including lighting), replacement and disposal of the artificial turf (when it needs to be replaced).
- The added traffic, capping the natural field with a synthetic surface, and installation of lights would add to the carbon footprint of the park at a time when the State of Washington has pledged to lower its carbon emissions to 1990 standards by the year 2020.
- The potential effects of climate change on the park natural resources, the land, and in particular the wetland should be examined for each of the alternatives being considered for ballfield improvements. Examine the ballfield improvements alternatives in relation to the “Preparing Washington State Parks for Climate Change” study (2017).⁴
- On warm days, artificial turf will have elevated temperatures – higher than the grass field, higher than the air temperature. We shouldn’t be creating heat in the midst of a climate crisis.
- Warmer temperatures and reduced rainfall may also affect wildlife, the vegetation surrounding the play fields, and existing soil hydrology.
- How will the ballfield improvements proposal be affected by climate change (e.g., higher temperatures, reduced water into wetlands)? Expand the site analysis; this is not an isolated area. How will the field and surrounding areas intertwine?
- The SEPA process should not only assess environmental impacts under current conditions, but also future conditions with climate change. Studies indicate that wetlands, in particular, are sensitive to the impacts of climate change.
<https://www.wetlands.org/wp-content/uploads/2015/11/Wetlands-and-Global-Climate-Change.pdf>

4.1.4 Water

- Concerned about the impacts of artificial turf on downstream water quality; waste disposal of synthetics when turf wears out; carbon footprint and loss of carbon

³ “Climate” is an element of the Air section in the SEPA Guidelines (WAC 197-11-444).

⁴ Commenter provided the following link : <https://cig.uw.edu/wp-content/uploads/sites/2/2014/11/WA-Parks-Vulnerability-Assessment.pdf>.

sequestration in the grass field. See water quality and runoff water management questions listed in the Environmental Health section below.

- Available documents indicate that the wetland is hydrologically connected to Lake Washington. Is this wetland considered jurisdictional under Section 404 of the Clean Water Act? Would the ballfield improvements require a JARPA or State NPDES permit for creating stormwater discharge to waters of the State (if not waters of the U.S.) from the fields and parking area? Project documents describe creating discharges into the adjacent wetland from the fields and potential stormwater runoff from parking lot expansion. Will toxic loading from this site impact Lake Washington water quality?
- Parking lot improvements and materials associated with paint and caulk for the field should include assessments as potential ongoing sources of PCBs in runoff that would be discharged to the wetland and waters of the park.
<https://fortress.wa.gov/ecy/publications/documents/1604014.pdf>. Surface runoff is the largest pathway to the aquatic environments of Puget Sound.
- The SEPA process should identify what type of stormwater monitoring would be needed before, during, and after construction to monitor for release of contaminants that have been found with proposed activities (paints, transmission fluids, motor oils, and synthetic turf).
- Skeptical that the stormwater management proposal would be sufficient to control the rate of discharge to not exceed existing conditions.
- The natural turf field is a water buffer that helps maintain seasonal water flow. Changes to the buffer would impact the ecosystem.
- Include a technical drainage and hydrologic analysis for Wetland A, and specific details regarding materials and systems that would manage ballfield-related stormwater quality and quantity. Include specific design features that would be incorporated into the proposed subsurface drainage system (of any of the alternatives, where applicable) to ensure that stormwater flow and drainage would flow east toward the wetland.
- The Pertee 2017 athletic field stormwater drainage plans do not contain any existing condition stormwater drainage or hydrologic analysis (e.g., seasonal flow/runoff rates or volumes) for Wetland A. An e-mail message from Paul Anderson (Ecology) to Linda Kunze (WSPRC) confirms the importance that project improvements not reduce the amount of water that currently drains to Wetland A from the natural turf field. Follow Ecology stormwater management requirements.

4.1.5 Plants & Animals

- Analyze the pressures and possible negative impacts on the valuable trees near the perimeter of the field. The previous SEPA Checklist prepared by the City of Kenmore identified precautions to be taken for the trees, but indicated that there would be no guarantee that these precautions would succeed in preserving the trees.

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- Artificial turf would negatively impact animals (insects, squirrels, raccoons, field mice, deer, hawks, snakes, etc.) that utilize the grass field for food and/or shelter.
- Some of the native wildlife species in the park are becoming rare in the Seattle area; e.g., northern red-legged frog, Townsend's chipmunk, Douglas squirrel, bald eagle.⁵ One reason for the high diversity of wildlife in the park is relatively low levels of human disturbance, particularly in the evening, nighttime, and early morning hours when many species are most active. The impact analysis should address:
 - Noise and night lighting effects to disturbance-sensitive species, including native predators.
 - Noise and night lighting effects on bats that use the field area for foraging.
 - Impacts of non-native "edge" species (e.g., non-native rats, crows, domestic cats) that have a greater tolerance for disturbance and are able to exploit anthropogenic resources (e.g., food waste and food-soiled trash). These species could negatively affect native species.
 - Impacts to the wetland and wetland buffer habitat, including the fresh water habitat found in the existing drainage ditches, and resulting impacts on the species that occupy these habitats; in particular, birds, bats, amphibians, and macroinvertebrates.
 - Loss of the field as habitat for some species (e.g., bats, black-tailed deer, others).
 - Effects of fencing on wildlife movement.
 - Wildlife mortality attributable to increased traffic on the park access road, particularly evening traffic.
- According to a recent study [not cited], Saint Edward State Park is home to robust populations of deer, bobcat, raccoon, weasel, mountain beaver, Douglas squirrel, owls, bats, reg-legged frog, and others. The health of these populations should be considered in any additions to park facilities, including the hardening of the field surface, night lighting, fencing, and increased road traffic.
- Concerned about the potential impact to migrating birds and other wildlife.
- The field is not just a field but a habitat, a home, an amazing ecosystem for this park. Deer often graze in the field. Frogs, tadpoles and salamanders thrive in the wetland adjacent to the field. Birds, rodents, and rabbits use this habitat, and we recently spotted a fox (or coyote) out on the field.

⁵ Commenter referenced Stokes and Samuelson 2019 Report to State Parks.

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- Saint Edward State Park is a designated Biodiversity Area and Corridor.⁶ There is no other area of native habitat in the Seattle area that compares with Saint Edward in size, diversity and quality of native habitat.
- The field hosts portions of habitat that are not found anywhere else within the Saint Edward State Park boundary.
- The field site is an environmentally sensitive area but the mitigation plan would offset the impact.
- How would “off-site” mitigation (e.g., improvements proposed by the City of Kenmore at locations elsewhere within Saint Edward Park) mitigate the damage that would be done to the field and its immediate surroundings (like the stream)?
- Native animal habitat is already being encroached upon by human activity, affecting their ability to survive.
- A Camp Roots student reports seeing interesting animals in the field and in the wetland area. If the natural grass field is removed, fewer animals would be able to live on “fake grass.” Big lights might also harm nocturnal animals who need the dark.
- Allow nonprofit organizations like Audubon to build educational programs and bird blinds, but keep the grassy field dark and quiet for peace and tranquility in this urban setting. People for an Environmentally Responsible Kenmore could be invited to work with State Parks to contribute to planning for an environmental education program.
- Concerned that ballfield lighting and the lights of cars would harm animals [in the park], especially bats.
- Concerned about the adverse effects of field lighting on animals and birds (night hunters like owls and bats).
- If lights are a concern for bats, keep in mind that the lights go off and bats would still get their darkness just as they do during summer months when the days are longer.
- Following the bat study prepared for State Parks (Owl Ridge Natural Resource Consultants, Inc., August 2017), the City of Kenmore in their own reporting (ESA, September 2017) focused on the common bat that would not be seriously impacted and ignored the more serious impact to another species of bat in the park.
- Flood lights would disrupt natural cycles. They would throw the predator-prey relationship out of balance by making it easier for predators to hunt for longer periods of time. Prey would get little to no relief from being prey.

⁶ Saint Edward State Park is a designated Biodiversity Area and Corridor according to Washington Department of Fish & Wildlife’s PHS on the Web interactive mapping application (<http://apps.wdfw.wa.gov/phsontheweb/>). However, the seminary, ballfield, and access road are excluded from the mapped polygon.

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- Light pollution is known to negatively impact invertebrates (many species of spiders hunt at night) and vertebrates (e.g., bats, owls).

4.1.6 Wetland & Stream⁷

- There would be impacts to the wetland, which deserves a proper buffer area to protect and promote the species that live and grow there.
- Provide a technical drainage and hydrological analysis of the wetland and buffer and other critical areas. What would be lost by removing or diminishing these areas?
- The sports field complex would build into 90 percent of the currently required wetland buffer, bringing it to within 10 feet of the wetland.
- What is the plan to protect the wetland?
- Provide a detailed demonstration that the wetland mitigation proposal would be successful.
- While most research focuses on potential toxic effects of artificial turf [tire crumb rubber] on human health, there are also studies that focus on aquatic life as the turf serves as an ongoing source that carries chemicals via runoff to adjacent waters. A study by the State of Connecticut found runoff from turf fields with concentrations of zinc that are toxic for aquatic life.
- Were frogs and salamanders there [in the wetland] before the field was neglected? The drainage has gotten worse over the years which brings wildlife that wasn't there before.
- The field and adjacent wetland form the headwaters of a creek (WRIA 08.0226) that supports kokanee and sockeye salmon runs. (Other comments say the stream contains Chinook salmon and steelhead.) The people of Washington want to do everything in our power to preserve these iconic fish.
- The field would have a drainage system that may affect water levels and flow regime in the wetland and creek downstream from the ballfield. Assess the impact of these effects on water quality, slope stability, and wildlife.
- Promote environmental protection and education with nocturnal animal and salmonid (maybe even Kokanee) restoration and education.
- WRIA 8 calls for restoration of streams, especially salmon spawning streams, at the shores of Lake Washington. Destroying the headlands of Stream #0226, the only stream that originates in Saint Edward Park – at the southeast corner of the playfields, and completes its course to Lake Washington where salmon spawn at the outlet – and would spawn further upstream if the outlet were minimally restored.

⁷ Wetlands and streams are typically discussed as a subsection of the Water element. Since most comments on the ballfield improvements proposal appear to be on the habitat value of the wetland and stream, these features may be discussed as a subsection of the Plants and Animals section.

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- Concerned about wetland loss and impacts to wildlife movement.
- The field is an extension of the wetland. It is often soggy wet because of water seeping up through the grass. Wetlands are not static entities that we can put boundaries around; they need to grow and shrink as conditions change. Not convinced that the wetland mitigation plan would be enough.
- Evaluate all impacts to wetlands and other critical areas. The WSPRC Natural Resource Management Policy requires “ . . . minimizing functional impacts to [wetlands] and the processes they perform . . . to ensure no net loss of the acreage or function of the State’s wetlands.”

4.1.7 Energy & Natural Resources

No comments were received on Energy and Natural Resources.

[Note: In the post-construction condition of the ballfield improvements, electrical energy would be required for field lighting. LED lights would be used for high energy efficiency. SEPA Checklist (February 2018) Section B.6 (Energy and Natural Resources), page 24. In the absence of significant impacts to Energy or Natural Resources, this element of the environment would not be discussed in the EIS.]

4.1.8 Environmental Health⁸

- Artificial turf consists of plastic that would break down. Micro particles would enter the natural environment.
- The rubber/plastic beads get everywhere, especially in adjacent streams. I even got some out of my children’s water bottles after they played soccer on turf in North Creek and Big Finn Hill.
- Artificial turf recycle is estimated at less than 20 percent, resulting in more plastic in the environment (likely in a landfill).
- Plastic produces no oxygen. It would likely generate undesirable gases as the artificial materials break down.

⁸ The Environmental Health element in the SEPA Guidelines addresses noise, risk of explosion, and releases or potential releases to the environment affecting public health, such as toxic or hazardous materials (WAC 197-11-444). It appeared from the large “dot count” on the Environmental Elements poster (see results in Appendix A) at the EIS public scoping meeting that many participants interpreted the term Environmental Health to refer to the health of the environment. The health of the environment will be assessed through the impact analysis of several other elements of the environment in the SEPA Guidelines format. The Environmental Health section of the ballfield improvements EIS will focus on potential releases to the environment that might affect human health. Noise may be addressed in a section with a heading level equivalent to Environmental Health.

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- Concerned about the possible health risks of artificial turf (Astroturf?). Soccer goalies (who have close contact with the turf) have had higher incidences of cancer. Let's not wait to confirm that Astroturf was the cause.
- Crumb rubber and other materials come with numerous compounds and chemicals that have not been fully studied to assess their environmental and health impacts on our children and the natural environment.⁹ The State of California is currently conducting a comprehensive study to try to discern these facts. Other studies have shown reason for concern.¹⁰
- The concept of "non-toxic" turf requires greater analysis and consideration. Extensive research is ongoing about the toxicity of synthetic turf that carries contaminants like organic toxins and heavy metals.¹¹ Due to the high concern generated in recent years about the safety of recycled tire rubber used for recreational sports surfaces, [the cited studies] aim at evaluating the presence of 40 organic compounds including polycyclic aromatic hydrocarbons (PAHs), phthalates, adipates, vulcanization additives and antioxidants in recycled tire crumb of synthetic turf football fields.
- Explore the potential toxicity of the turf using peer-reviewed scientific papers as opposed to industry reports. The EIS should analyze the impact of potential toxics.
 - Leachate from artificial turf fields has been found to contain a number of metal and organic compounds. While the primary source of these has generally been recycled tires, it appears that the artificial turf fibers (blades) also contribute to contaminants released from the field. See bibliography attached to the People for an Environmentally Responsible Kenmore (PERK) letter, Environment Studies 9, and Brown et al. 2008 on page 14 of the PERK letter.
 - Evaluate the potential for contaminants from the field to reach the wetland, stream, and Lake Washington.
 - Investigate the likely effect of contaminants on terrestrial and aquatic flora and fauna.
 - Describe the drainage infrastructure necessary to contain/treat leachate from the artificial turf, especially in the context of major fall and winter rain events.

⁹ The City's proposal specifically excludes use of tire crumb rubber infill. A new generation of certified lead-free synthetic turf and inert fill material (silica sand) would be installed. SEPA Checklist (February 2018) Section B.7.a (Environmental Health), page 24.

¹⁰ Commenter provided the following link: <https://oehha.ca.gov/risk-assessment/crnrr/oehha-synthetic-turf-scientific-advisory-panel-meeting>
<https://www.ncbi.nlm.nih.gov/pubmed/31134396>.

¹¹ Commenter provided the following links: <https://www.ncbi.nlm.nih.gov/pubmed/29268178> and <https://www.ncbi.nlm.nih.gov/pubmed/22921644>.

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- Describe the environmental effects of artificial turf maintenance. Chemicals such as algaecides or disinfectants are often used to keep the surface clean. How are these chemicals prevented from entering surface water or groundwater?
- What effects do chemicals and algaecides used in cleaning have on the environment when released to into the environment?
- Describe toxic waste disposal when the turf (and subsurface drainage) must be replaced.
- Artificial turf is unsanitary. The investigation of potential effects on people should include:
 - Increased risk of infection due to bacteria on artificial turf substrate. See bibliography attached to the PERK letter; Health Studies 5, 15, 20 and 21.
 - Increased risk of contact with contaminants from artificial turf (different from tire-origin contaminants), such as lead and chromium. See bibliography attached to PERK letter, Health Studies 8, 9, 10, 11 and 27.
 - Increased exposure to heat by athletes playing on artificial turf. See bibliography attached to the PERK letter; Heat Studies 1 through 9.
 - Increased probability of sports injury on artificial turf vs. natural field. See bibliography attached to the PERK letter; Health Studies 2, 4, and 22-24.

4.1.9 Noise

- Ballfield use and extended hours of use are likely to generate significant noise associated with the increased number of events: screaming players and fans, aluminum baseball bat clinking, and increased traffic.
- What is the mitigation plan for evening noise?
- Consider the cumulative noise impacts of the ballfield improvements proposal and the Daniels project; i.e., negative effects on existing park users and wildlife, and the quality of the park environment.

4.1.10 Land & Shoreline Use

- Saint Edward State Park contains the only undeveloped shoreline on Lake Washington, and it is the largest tract of protected forest with significant topography in all of urban King County north of I-90. The wilderness character of the park clearly makes it a unique and special place in the region. Since the development of ballfield infrastructure in the park would detract from this essential character, every element of the built and natural environment needs to be fully addressed in the DEIS.

- Artificial turf fields can be very fragile and may need to be strongly fenced off at all times, even when not in use. This would permanently remove useable land from the park, even in winter and at times of bad weather.
- Inventory and evaluate the existing supply of ballfield facilities in the vicinity of the proposal. Google Earth shows six improved grass ballfields within a 1.5-mile radius of the Saint Edward site. There are more than 18 additional ballfields in Kenmore, Bothell, Woodinville and Kirkland within a 5-mile radius of the State park. What is the justification for new ballfields in view of what appears to be the more than adequate existing supply?

4.1.11 Relationship to Existing Land Use Plans & to Washington State Parks Policies

- Please include in the EIS the Saint Edward State Park Land Classification and Long-Term Boundary map with a legend. The Saint Edward State Park (SESP) Classification and Management Plan (CAMP) has the map (page 14) but no legend. It will be important to reference the CAMP policies for the Land Classification area that includes the ballfield proposal.
- A Washington State Parks and Recreation Commission decision on April 26, 2007, emphasized that the City of Kenmore should not bring further playfield development proposals to the Commission because this is a regional park.
- In the Secretary of the Interior rules regarding “development,” ballfields development is not allowed on lands obtained with Land and Water Conservation Grants (LWCG) for passive use without just compensation to the public for like land. Money is not “just compensation.” Ballfields (for organized sports like baseball, football, soccer, cricket) can be maintained but not improved or developed according to the rules of the LWCG without land of equal value being provided by the developer. This is true even if the properties are historic.¹²
- Would like to see “The Concept of Usage in General” addressed in the EIS, using documents that contain intention, usage, and limitations of State Parks in Washington. Examples from the Washington Administrative Code include:
 - WAC 352-32-165: Public assemblies, meetings.
 - WAC 352-32-056: Peace and quiet.
 - WAC 352-32-047: Special recreation event permit.
 - WAC 352-32-045: Reservations for use of designated group facilities.
 - WAC 352-32-340: Approval of community-based park improvements.

¹² Commenter suggests reviewing the LWCG rules handbook, Volume V-39, August 25, 1977 through October 31, 1977.

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- WAC 352-11-665(1)(b): Unquantified environmental amenities and values to be considered along with economic and technical considerations.
- Consider the ecological importance of the State Park as a natural space.
- Saint Edward is a State Park, not a City park, not a sports complex.
- Please consider the precedent that would be set for continuing to develop the park and reduce its character and ecology.
- The proposal would displace current recreational and educational use for the benefit of a limited population of organized sport field users.
- The ballfield development proposal is in conflict with the Washington State Park Cultural Resources Management Policy (2010).
- The range of alternatives should be consistent with the Park Commission's general desire to renovate the ballfields for "a variety of organized and unorganized recreational events . . . including blocks of time for unscheduled field uses." SESP Management Plan, pages 18-19.
- Include a complete evaluation of compliance with the SESP CAMP which states that "Field lighting is not recommended."
- Evaluate the ballfield improvements proposal and alternatives in relation to the SESP CAMP; e.g., blocks of time for unscheduled use; natural grass is preferred; field lighting is not recommended; should be a local government responsibility; relocate facilities to protect wetlands.
- Part of the State Parks Mission and Vision Statement is "State Parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives." The State Park should remain a park that serves and welcomes the diversity of community and continues as many acres of rural woodland and undeveloped waterfront.
- Evaluate the wetland buffer variance application in the context of the Kenmore Municipal Code.
- Consider the community survey results obtained during the January 2019 City of Kenmore Park, Recreation, and Open Space plan update. Top priorities for investment included natural areas/reserves. Top priorities did not include ballfields. Only 33 percent of respondents identified a need for outdoor multi-use athletic fields. (See additional information in the redacted comments document, Appendix D pages 70-71.)
- The recent hotel proposal approved for renovations of the historic buildings was made by developers to the public on conditions that permitting authorities would entertain no further development of the park. Now this artificial fields and stadium proposal . . .

4.1.12 Social Justice¹³

- Concern regarding reduction in access to native forest experience for Washington residents in the Seattle area.
- Saint Edward State Park serves as the most accessible site for many Seattle area residents to experience relatively intact Pacific Northwest nature without having to travel to a distant national park. The impact analysis should address:
 - Added disturbance in the form of noise, light, and traffic on the visitor experience of those who come to the park for its natural values.
 - Reduction or loss of wildlife viewing opportunities on the existing grass field for park visitors.
 - Loss of the “living grass experience” as a recreation area for diverse park visitors.
 - Loss of the educational value of the existing grass field to environmental education camps that currently use the park.
 - Loss of the environmental education potential of the wetland and wetland buffer, and reduction in the functionality of the Saint Edward Education and Research Center (EERC) funded in 2019 by the Washington State Legislature.

4.1.13 Housing

No comments were received on Housing.

[Note: No housing units would be provided and none would be eliminated. SEPA Checklist (February 2018) Section B.9 (Housing), page 28. In the absence of significant impacts to Housing, this element of the environment would not be discussed in the EIS.]

4.1.14 Light & Glare

- Will the proposed lighting be further damaging to the natural habitat of the woods?
- Intense use of the ballfields and extended hours of use with lighting is likely to generate significant light and glare associated with an increased number of events.
- What is the mitigation plan for the effects of evening lighting?
- Consider cumulative light and glare impacts (with the Daniels project) on park users and wildlife, particularly wildlife associated with the wetland. Impacts must be avoided or mitigated on-site, including those related to light-sensitive bats.
- Look at a street lighting upgrade.

¹³ Social justice is an element of NEPA EISs but not SEPA. If State Parks determines that these issues will be addressed in the ballfield improvements EIS, the most logical place for comments on this subject would likely be the Relationship to Plans and Policies – WSPRC policies.

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4.1.15 Aesthetics

- As this field is located at the entrance to the open park, a modern sports complex would totally change the “vibe” and degrade first impressions.

4.1.16 Recreation

- Existing use of the field includes environmental programs like Camp Roots Forest School, Wilderness Awareness School, Little Roots and Tiny Trees Preschool.
- Wilderness Awareness School has been running nature education programs at SESP for more than 15 years. The ballfield area is used all summer long for multiple hours each day as the basecamp for WAS programs. More than 535 youth from the local area participated in WAS programs during the summer of 2019. The ballfield improvement project would greatly impact these programs as WAS would no longer be able to use the field, potentially causing the program to relocate to a different area further away from local families.
- Other alternative open areas within Saint Edward State Park are less suitable for environmental education programs. In particular, the Great Lawn is heavily used by other park visitors for strolling, dog walking, picnicking, etc. and is in plain view of the Lodge and Lodge guests. It is not adjacent to the wetland used for observation, and it is not accessible to the public rest rooms that are adjacent to the ballfield.
- The planning process for the Saint Edward State Park Environmental Education and Research Center (EERC) was completed June 30, 2019, providing recommendations for a comprehensive university-led environmental education model that will integrate outreach and interpretation, life-long environmental learning, and place-based community science research. There is no logic in having invested in the serious effort to establish the EERC if the programming of existing anchor partners (WAS and Camp Roots) would be displaced and/or significantly compromised by the ballfield improvements proposal. (See additional information in the redacted comments document, Appendix D pages 58-64.)
- Families and informally-organized groups play pick-up soccer, softball, frisbee, and fly kites on the existing grass ballfield.
- Recreation in the park would be severely impacted. Hiking, picnicking, and enjoying the natural elements of the park would give way to organized baseball.
- Unscheduled use of the park would be allowed before 4:00 PM on weekdays, but this is when kids are in school and couldn’t use it anyway.
- The field is used for wildlife viewing. Park visitors are often seen photographing deer that graze in this field.
- Adjacent to the park road, this field provides an opportunity for people with low mobility to see deer grazing without hiking or venturing a great distance from their cars.

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- Having more ballfields with loud crowds and increased traffic would greatly add to the noise in the area. This would be a significant impact for those trying to enjoy the peace and quiet of the trails.

4.1.17 Historic & Cultural Preservation

- The proposal is contrary to both the natural and historical aesthetic that the park is supposed to maintain.
- Address loss of the cultural value of the field in its traditional (and existing) condition.
- Installation of the proposed stadium-style light poles would present a jarring sight on the park's culturally significant landscape.
- The ballfield improvements proposal would obliterate or adversely affect the natural, historic character of the park.
- Acknowledge the historical use of the site (many decades of ballfield use). Even the SESP CAMP identifies the space as being for active recreation. It is a shame that the existing field has been allowed to deteriorate.

4.1.18 Transportation & Parking

- Any and all impacts related to increased traffic from the ballfield uses and the Daniels project should be analyzed, including impacts to pedestrians and hikers, and impacts to bicyclists traveling to, from, and within the park. Traffic and parking studies prepared for the hotel/convention center were not reliable and should not be used in conjunction with the ballfield development. It is not yet possible to say what the traffic and parking impact of the hotel will be.
- Look at the Bastyr road connection.
- Juanita Drive NE is already at capacity during the morning commute and every afternoon starting in mid- to late afternoon and into the evening. This arterial does not need to serve any more cars trying to access the park at these critical times of day.
- Concerned about more accidents on the road in and out of the park where bikers cross the road and Bastyr students speed in and out.
- There is no road traffic mitigation in this project. The road is narrow. This would impact neighboring streets, especially the already-busy 68th Avenue NE and the river bridge north of the park.
- Concerned about increased traffic congestion and potential traffic bottlenecks with increased volume of cars at night.
- The traffic study (May 2016) is outdated. Changes in traffic patterns have occurred since that time (increased use of Juanita Drive NE). Juanita Drive NE is the only route off the hill between 110th Avenue NE on the east, Juanita Drive NE on the west, and NE 181st

Street on the south, if going to Kenmore. There are significant back-ups to get through the lights from Simonds Road to Bothell Highway. (See additional information in the redacted comments document, Appendix D pages 54-55.)

- Traffic at the light on Juanita Drive NE already gets backed up even with small events. With the bicycle and pedestrian traffic along the road, it is going to increase the danger of accidents and increase noise and emissions (from cars that would be idling directly adjacent to woodland trails).
- The light at the entrance to Saint Edward Park (NE 145th Street) exacerbates delays on Juanita Drive NE between NE 153rd Street and NE 141 Street when an event at the park is breaking up, or when Bastyr University classes are letting out.
- Bicycle lanes on Juanita Drive NE are not considered safe by cyclists who commute on this route due to the absence of a barrier (even a low curb) between cars and riders.
- Residents voted for walking paths along Juanita Drive NE quite some time ago, but there have been no signs of any work starting on this project.
- Metro does not serve Saint Edward State Park.
- There is insufficient parking even with expanded parking spaces. Evaluate parking in the cumulative impacts analysis.
- The parking issues associated with the ballfield improvements proposal would be overwhelming, impacting all visitors to the park. Visitors should not have to circle the park to find a parking space due to the ballfield use.
- If lawn parking is envisioned as a solution to the ballfields parking demand, include a full accounting of the environmental impacts of lawn parking.

4.1.19 Public Services & Utilities

No comments were received on Public Services and Utilities.

[Note: The City of Kenmore proposal for ballfield improvements includes the City having responsibility for constructing, managing, and maintaining the improved fields. Minimal impacts to public services would be anticipated (possible periodic need for emergency medical aid). Proposed field lighting would require electrical power that could be extended and existing primary power line in the area. SEPA Checklist (February 2018) Section B.15 (Public Services), and Section B.16 (Utilities), page 39. In the absence of significant impacts to Public Services or Utilities, these elements of the environment would not be discussed in the EIS.]

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4.1.20 Economic Impact Analysis¹⁴

- Why hasn't financial impact been estimated? Current vs. future maintenance; cost to operate; cost of electrical lighting; tax payer impact. Organized sports tend to charge participants and operate with volunteers. It would take a lot more resources to maintain an artificial turf field with lighting.
- Prepare an analysis of the dollar cost of artificial turf, including maintenance (and replacement) throughout the years of the lease, plus the intangible costs to the environment of removing that great amount of living grass and soil.
- Complete an engineering and cost analysis of the sub-structure under the artificial turf.
- The City of Kenmore wants to spend one-half of its annual budget (\$5 million) on two artificial turf baseball fields. What is being done with our tax dollars to squeeze in the cost of everything else?
- The DEIS should evaluate the total cost of each of the alternatives, and identify sources of monies for the renovation, on-going maintenance, and replacement cost of the turf field over time. Will there be a public/non-profit partnership involved?
- Compare the costs and other elements of the City of Kenmore preferred alternative for the Saint Edward State Park ballfield improvements project with costs of field development and improvements on Northshore School District sites.
- If existing ballfields within a 5-mile radius of Saint Edward State Park have inadequate "hardware" (e.g., lights, surface, restroom facilities), could not existing facilities be improved at less cost?
- WSPRC would have a consistent tenant at the improved ballfields from March through the summer, making it a profitable investment.

4.1.21 Cumulative Impact Analysis¹⁵

- Please include analysis of cumulative effects of light and glare, noise, parking and traffic that will likely be amplified when combined with effects associated with operation of the leased seminary building.
- Please consider the City of Kenmore proposal in the broader context of what is happening within the park (Bastyr and the seminary/hotel renovations); in the

¹⁴ A cost-benefit analysis is not required by SEPA. For purposes of complying with SEPA, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations (WAC 197-11-450). Also see the discussion of WAC 197-11-448 in Footnote 1 (Section 2, above).

¹⁵ The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants (WAC 197-11-660). This will depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant's proposal, and the capability of applicants or agencies to control the impacts in each situation (WAC 197-11-060).

surrounding area (high amounts of development and densification); in the metropolitan area (great population growth at the cost of habitat loss and development); and the long-term impact this has when we know future climate change conditions would further impact our area.

- Evaluate cumulative impacts from both the Daniels proposal and the ballfield improvements proposal; i.e., the magnitude of change in the character of the park and effects on park users in keeping with the historic status and intended use of the property for passive outdoor recreation; light; noise; traffic; bats.
- Also consider the parking needs of the EERC in the cumulative parking demand analysis.
- Let's deal with the hotel and its impact for a few years before we add another project.
- The plan seems at odds with the restaurant/spa plan that is currently underway.

4.2 Comments Regarding the Alternatives to be Evaluated in the EIS¹⁶

4.2.1 Alternative 1: Artificial Turf with Field Lighting

- Some perceive that there would be serious impacts associated with Alternative 1. Others express no concerns.
- Some express support the City's preferred alternative: "Our community needs a useable athletic field."
- Some commenters feel that the City's preferred alternative would be the "most logical use" with no concerns, stating that most if not all concerns regarding a turf lit field have already been addressed.
- Some cite environmental benefits to the artificial turf field (no irrigation, no fertilizer), and acknowledge the City's proposal to mitigate impacts.
- Support is expressed moving forward with this process. An artificial turf field with lighting would enhance the community. We can protect wildlife at the same time by limiting [the hours of lighting] to 9:00 PM.
- There is a severe shortage of ballfields in Kenmore. Both our City and the number of young people are growing. The existing Saint Edward ballfield has been used for baseball, softball, soccer and cricket¹⁷ for decades. It has been unmaintained and is now

¹⁶ Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation. The word "reasonable" is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative. The "no-action" alternative shall be evaluated and compared to other alternatives (WAC 197-11-440[5]).

¹⁷ Commenter indicated that cricket regulations require play on grass.

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in dangerous condition for the health and safety of children. There simply is no other available open space in Kenmore to develop safe and useable ballfields.

- In the Northwest, artificial turf and lighting are the only feasible way to re-develop these fields. For the majority of the year, there is not enough natural light to effectively run youth sports programs, and natural grass fields are not durable enough to support the use.
- To maximize the benefit of the field we need good drainage and lighting to extend field use.
- Support for field lighting if it would not interfere with abundant wildlife in the area.

4.2.2 Alternative 2: Artificial Turf, No Lighting

- Some perceive that there would be serious impacts associated with Alternative 2. Others express no concerns.
- Some support Alternative 1 and Alternative 2 as the most viable.

4.2.3 Alternative 3: Improved Natural Turf with Field Lighting

- Some perceive that there would be serious impacts associated with Alternative 3. Others express no concerns.
- Improved natural turf with field lighting (so teams can play at night) seems like the best way to maintain the field while also respecting that it is in a State park where people come to be in nature.
- Support for field lighting if it would not interfere with abundant wildlife in the area.

4.2.4 Alternative 4: Improved Natural Turf, No Lighting

- Some perceive that there would be relatively small impacts associated with Alternative 4 and find it acceptable.
- Support expressed for regrading, adding drainage, and replanting with grass.
- An improved grass field that can host some local organized recreation while not impinging on the integrity of a valued State Park.

4.2.5 Alternative 5: No Action – Existing Grass Field, No Lighting

- Preferred or strongly preferred by some; perception of no negative impacts. Request to protect the field and wetland.
- Others express concern that the field in its current state is in disrepair and detrimental to the surrounding environment: silt runoff, mowing, herbicides, etc. have a direct path to the wetland, with an opinion that an artificial turf field would resolve this.

4.2.6 Other Alternatives

- Please also account for the growing sport of rugby. A full-sized rugby pitch (field) has the same width and length as a full-sized soccer field, so it would be easily adapted to rugby games with only a few additional lines to be added.¹⁸ The field goal posts¹⁹ could be removable, making the field safe for other sports (soccer, cricket and baseball).
- Please consider adding lacrosse field lines so more sports would be represented on this public ballfield space.
- Evaluate a grass turf field with no lighting with rehabilitation and enhancement of the full required wetland buffer width with no requirement for a variance. SESP Management Plan pages 18-19 (Items 6 and 9), and Policy #3 under Natural Resources.
- An environmentally-friendly restoration of this field is what needs to be considered.
- Evaluate alternatives for fields at other properties owned or operated by the City of Kenmore outside of the State Park. Consider the impact to the regional community.
- If any and all existing athletic fields in the area could become fully utilized, might the City of Kenmore be able to expand its athletic events capacity and leave Saint Edward State Park undisturbed?
- Locate sports fields centrally in Kenmore to manage growing traffic problems.
- Consider the Lakepointe site. It is flat, and would be an ideal location in downtown Kenmore along a public transit route.
- Evaluate additional community recreational facilities available to the City of Kenmore to locate ballfields for competitive sports (with artificial turf and field lighting) outside of the park (e.g., at school sites – Bothell High School, Kenmore Elementary School, or Arrowhead Elementary School). SESP Management Plan pages 18-19 (Item 11).
- The nearby cities of Bothell, Woodinville and Kirkland have all built similar facilities on City-owned land or on school grounds where concrete and electric infrastructure already exist. King County has also built facilities in County-owned land. All of these facilities are within a short drive of Kenmore.
- Go to Lake Washington School District (e.g., Finn Hill Junior High) where the track, football field, and two ballfields are poorly maintained and underutilized.
- Better to improve the North Shore School District Ballfields that are in poor condition and in-play for ballfield use.

¹⁸ Commenter indicated that in rugby there should be a maximum of 100 meters (109 yards) between the two try-lines, with anywhere between 10 and 22 meters behind each try line to serve as the in-goal area, and 68 to 70 meters wide. Rugby posts are on the goal line. A goal post on each goal line is 5.5 meters wide and at least 16 meters high, with a crossbar set 3 meters above the ground.

¹⁹ Commenter suggested that local rugby clubs may be willing to cover the cost of purchasing and installing the goal posts.

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- There are underutilized ballfields at Big Finn Hill Park and Bastyr University. The City of Kenmore could save money by sharing facilities that already exist.
- There is a premier little league field less than a mile away at Big Finn Hill Park. Work with the City of Kirkland to schedule times for fields to be used by both Kirkland and Kenmore leagues.
- The City of Kenmore should lease land from the golf course.
- Review precedents for local governments to use State Parks for sports facilities.
- The list of alternatives only mentions turf and field lighting options. Why is there no mention of dugouts, covered bleachers, walkways, additional parking pavement?
- Consider changing natural turf to non-grass flowering vegetation (e.g., clover) that would feed bees, butterflies and other insects.
- Consider restoring this meadow to a more natural state that would benefit the adjacent wetland area and in a way that would best continue to provide beauty and learning opportunities to our residents (humans, plants and animals).
- If State Parks allows the field improvements to be made, then it should be done in a manner that it can be removed during the off season to allow other use of the land and for recovery of the field's vegetation.

4.3 General Comments: Opposed

- The City of Kenmore proposal should be rejected. The built environment proposed does not fit with the purpose of State parks. The park should be a respite from the urban environment of hurry, noisy, too close to each other that people are coping with.
- We are a diverse community and many of our families do not need a ballfield, but do benefit from having green space to play and picnic, play frisbee, and enjoy nature.
- Opinion that artificial turf should not be used in a natural setting like a State park (inorganic, incongruent with the rest of the park). Artificial turf fields would be more appropriate in a more central Kenmore location or closer to a middle school. The hotel project is being handled respectfully. So should the State park and environment that our families are honored to have in our backyard.
- The park is going to be significantly degraded by the hotel complex in the seminary building, added traffic in the evening and additional parking needed for conferences and events. We must protect as much of the remaining park as possible for activities that do not disrupt the animal and plant life any more than they are now.
- A ballfield could go on an old parking lot or on the site of retail stores being phased out, but you cannot recreate wild second-growth forest and its ecosystem on such a site.

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- We should put research into more sustainable ways to maintain fields and perhaps consider lowering our standards in terms of pristine lawns in order to meet everyone's needs.
- Sports field-using organizations and field owners resist cooperating with each other to efficiently use existing sports fields. Near-professional quality fields are unnecessarily demanded for children and other amateurs. The City of Kenmore should not further subsidize this never-satisfied special interest by renting land in a State park.
- Please do not continue to allow special interests to chip away at the park until its welcoming, natural feel is permanently gone.
- One park user reports spending lots of time after cricket matches picking up cigarette butts and garbage left behind – testimony that this user group has no intention of being good stewards to, or contributing to, what the park is really all about.
- Who will be responsible for emptying overflowing garbage cans, picking up the cigarette butts, sunflower seeds, and excess plastic typically present on an artificial field following a sport event?
- Kenmore should build the fields on their own park land.
- Very concerned that the ballfield as proposed would remove the very quality we go to Saint Edward State Park for. Ballfields are available nearby in municipal settings. We need to preserve and protect spaces such as the natural field.
- Concerned about the impact on existing programming within the park. Environmental programs like Camp Roots Forest School and Wilderness Awareness School utilize the ballfield in its current state daily, throughout the year (300+ hours during the 2018-2019 school year). Also mentioned: the Little Roots program. The ballfield proposal would eliminate much of the field's usability for these programs.
- This field and wetland would be beneficial to the new Environmental Education and Research Center (a partnership between State Parks and UW/Bothell) for wetland studies.
- Tiny Trees Preschool is located in the outdoor woods, rain or shine.
- For most park users, permission is given for a limited time and the Park is available for other users the rest of the time. With the ballfield improvements proposal, permission would be unlimited, even when Little League is not in season.
- The space is also currently used by families for picnics, sports, and casual recreation. Converting the area to a turf field would restrict use of the land.
- Urge State Parks to adhere to its mission to serve the interest of all citizens of the state, not a local special interest.

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- Saint Edward has been a tranquil place within our urban area to hike, walk and rejuvenate. Adding popular spectator athletics to this space may negatively affect this already diminishing tranquility.
- Why is the [City] council continuing to use our tax money for repeated EIS studies when the preceding studies don't meet their purpose?
- We, the other users of the land, don't want [the ballfield improvements] built at all.
- Why would a lease be involved instead of a cooperative use arrangement?
- How would varied use be shared to avoid conflicts associated with simultaneous use?
- State parks protect important natural and cultural resources and provide for an appropriate level of recreational use, both passive and active, while ensuring that park values are upheld. The City of Kenmore ballfield improvements proposal imposes what is a more traditional local municipal organized recreational function upon a unit of our State park system. Synthetic turf and lighted ballfields are not an appropriate use of a State park. This is a municipal function that belongs on fields that are owned and operated by the City of Kenmore, or an established local park and recreation district, either of which would have taxing authority to establish levies or issue bonds to general local government function to advance active recreation.
- Much like the agreement that Lake Sammamish State Park has with soccer organizations in the Issaquah and Sammamish area, grass, unlighted fields are leased and utilized during certain times of the year for active recreation. The integrity of the State park is maintained, and the surrounding natural environs of the park are not as heavily impacted.

4.4 General Comments: Support

- This project is necessary due to the significant increase in population. The health and wellness of our community is a high priority. Physical activity in the form of sports allows us to achieve this priority.
- The number of children the ballfield improvements would serve far outnumbers the number of people who use the field in its current condition now. This would increase park usage and help get more children and adults outside playing.
- Support the project to proceed to provide a field close to home for youth players that currently have to drive to Woodinville.
- Some youth organizations are utilizing dirt fields at elementary schools that are a liability and difficult to schedule.
- Field improvements in any location would elicit public concerns, but the Saint Edward State Park site seems perfect for our community with much less negative impact than other locations in the area.

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- I am comfortable with the level of study and analysis that has already been completed by State Parks and the City of Kenmore – 15 years of information.
- Support the City's plan; encourage evaluating all the options. Consider reasoned approaches.
- This is an extremely small percentage of the entire park – a 3.5-acre parcel within a 300-acre park. There is plenty of room to accommodate natural space and solitude while also having functioning fields.
- This would not be a "new" public sports field, it would be a renovation of a ballfield that has been present for decades.
- To say that the field would be designed to accommodate two little league fields, two youth soccer fields, one full-sized soccer field, or one full-sized cricket field sounds like we would only get one of the four options. It would be more accurate to call it a multi-purpose field where any of the four activities could be played at different times.

5 Alternatives to be Analyzed in the EIS

SEPA requires that an EIS analyze the proposed action, the no action alternative, and reasonable alternatives that could feasibly attain or approximate the objectives of the proposed action but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440[5]). In the DS and Request for Comments on Scope of EIS, State Parks listed five preliminary alternatives to be evaluated in the EIS. Not all of these would attain City objectives for the proposed action; however, they are alternatives that State Parks is considering as landowner in the context of State Park policies and current uses of the existing grass field. The preliminary list of alternatives was as follows:

1. Artificial turf with field lighting (City's preferred alternative)
2. Artificial turf with no field lighting
3. Improved natural turf with field lighting
4. Improved natural turf with no field lighting
5. No action – how the field is currently used (existing grass, no lighting).

Several other alternatives were suggested in the public comments summarized in Section 4, above. Whether any of these alternatives will be evaluated in the EIS will be decided at a later time. The alternatives consideration process will be documented in the EIS.

The applicant (City) will not be required to produce fully engineered plans to evaluate each alternative in the EIS. The EIS will use existing documentation and reasonable assumptions about construction methods, industry-standard information about proposed improvements,

and the mitigating effects of applicable regulations to evaluate the impacts of the proposed action and alternatives.

6 Environmental Elements to be Analyzed in the EIS

This section outlines the areas of potential impact that will be evaluated in the EIS. The analysis will be consistent with WAC 197-11-440 and will describe the existing environment that will be affected by the proposal, analyze significant impacts of alternatives including the proposed action, and discuss reasonable mitigation measures that would significantly mitigate these impacts. This outline incorporates, but is not limited to, requests and issues identified in comments received during the EIS scoping period. The outline should not be considered complete. Additional issues to be analyzed in the EIS may arise during development of the EIS.

6.1 Earth / Earthwork / Soils

- Contaminants in runoff from the turf field – would these reach sediments along the Lake Washington shoreline?
- Tracking field infill material offsite.
- Frequency/machinery involved in replacing field infill material.
- Where would used infill material be disposed?
- Runoff quantity management measures to avoid streambank erosion.

6.2 Air Quality

- Air quality impacts during construction.
- Developed-condition air quality impacts in the park and surrounding neighborhood.
- Artificial turf maintenance procedures and equipment.

6.3 Climate Change / Carbon Footprint / Loss of Carbon Sequestration

- Carbon costs:
 - Loss of carbon sequestration if the existing grass field is removed.
 - Carbon cost of production, installation, operation, maintenance (including lighting), replacement and disposal of the artificial turf (when it needs to be replaced).

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- Washington State pledge to lower its carbon emissions to 1990 standards by the year 2020.
- “Preparing Washington State Parks for Climate Change” study (2017).²⁰
- Cumulative climate effects: ballfield and surrounding area.
- Wetland sensitivity to the impacts of climate change.

6.4 Water

- Artificial turf impacts on downstream water quality.
- Water quality impacts of waste disposal of synthetics when turf wears out.
- Federal jurisdictional status of the wetland under Section 404 of the Clean Water Act.
- Contaminants associated with construction and maintenance equipment.
- Contaminants in synthetic turf, and applications to synthetic turf.
- Stormwater management proposal (quantity, quality, wetland hydrology).
- Seasonal flow buffering effect of the natural turf field.

6.5 Plants & Animals

- Preservation of trees near the field perimeter.
- Biodiversity Area and Corridor.
- Effect of artificial turf on insects, amphibians, reptiles, rodents, raptors, mammals.
- Rare native wildlife species.
- Wildlife impact analysis:
 - Noise and night lighting effects.
 - “Edge” species effects (e.g., non-native rats, crows, domestic cats) that could negatively impact native species.
 - Wetland, wetland buffer, and drainage ditch impacts that would affect birds, bats, amphibians, and macroinvertebrates.
 - Loss of the field habitat for bats, black-tailed deer, others.
 - Effects of fencing on wildlife movement.
 - Wildlife mortality attributable to increased traffic on the park access road.
 - Migratory birds.

²⁰ <https://cig.uw.edu/wp-content/uploads/sites/2/2014/11/WA-Parks-Vulnerability-Assessment.pdf>

6.6 Wetland & Stream

- Wetland buffer as habitat.
- Hydrological analysis of the wetland, buffer, and stream.
- Wetland buffer mitigation proposal and chance of success.
- Fish use of the creek (WRIA 08.0226).

6.7 Environmental Health

- Plastic micro particle generation from artificial turf.
- Recycle consequences of artificial turf (when replaced).
- Potential health risks of artificial turf.
- Impact analysis for potential toxicity:
 - Metal and organic compounds in leachate from artificial turf field.
 - Potential for contaminants from the field to reach the wetland, stream, Lake Washington.
 - Potential effect of contaminants on terrestrial and aquatic flora and fauna.
 - Drainage infrastructure necessary to contain/treat leachate.
 - Environmental effects of chemicals used in artificial turf maintenance.
 - Toxic waste disposal when the field needs to be replaced.
- Potential unsanitary and human effects of artificial turf:
 - Risk of infection due to bacteria on artificial turf substrate.
 - Risk of contact with contaminants from artificial turf.
 - Athlete exposure to heat.
 - Risk of sports injury on artificial turf vs. grass field.

6.8 Noise

- Ballfield noise sources.
- Extended hours of use.
- Mitigation plan for evening noise.
- Cumulative noise impacts with the Daniels project.

6.9 Land & Shoreline Use

- Ballfield supply and demand analysis.

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- Effect of fencing on field availability for other uses.

6.10 Relationship to Plans and Policies

- WSPRC Cultural Resources Management Policy (2010).
- WSPRC Natural Resource Management Policy (2011).
- WSPRC Critical Areas Policy (2003).
- WSPRC Mission and Vision Statement (2018).
- SESP Classification and Management Plan (CAMP) (2008).
- SESP Land Classification and Long-Term Boundary map.
- CAMP Land Classification Management Guidelines (WAC 352-16-020).
- WSPRC meeting minutes re: community recreational facilities in State parks (January 11-12, 2007).
- WSPRC decision re: SESP as a regional park (April 26, 2007).
- USDI NPS Register of Historic Places (NRHP) Report (2007).
- Secretary of the Interior Standards for the Treatment of Historic Properties.
- KMC Critical Areas Ordinance No. 19-0488 (June 2019).
- City of Kenmore Park, Recreation, and Open Space Plan (November 2013).

6.11 Light & Glare

- Light and glare effects on wildlife habitat.
- Light and glare effects on adjacent land uses.
- Mitigation plan for evening lighting.
- Cumulative light and glare impacts with the Daniels project.

6.12 Aesthetics

- Park entrance first-impression effect on the cultural viewshed.

6.13 Recreation

- Environmental education programs.
- SESP Environmental Education and Research Center (EERC).
- Informal use of the existing grass ballfield.
- Loss of wildlife viewing access for people with low mobility.

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- Noise impact on trail users.

6.14 Historic & Cultural Preservation

- Historical use of the site.
- National Register of Historic Places listing.
- Cultural landscape.
- SESP Cultural Resource Management Policy.
- Cumulative impacts on historic character.

6.15 Transportation & Parking

- Cumulative traffic and parking impacts with the Daniels project.
- Parking supply and demand.
- Impact on Juanita Drive NE weekday peak hour capacity.
- Increase in traffic accident potential on the park access road.
- Traffic mitigation proposal.
- Pedestrian and bicycle safety.

6.16 Elements of the Environment Eliminated from Detailed Evaluation²¹

The following Elements of the Environment will not be discussed in the EIS as no comments were received and significant impacts are not anticipated:

- Energy and Natural Resources
- Housing
- Public Services and Utilities

²¹ WAC 197-11-440(6)(a).

Appendix A

**EIS PUBLIC SCOPING MEETING
SUMMARY**

MEMORANDUM



Date: August 14, 2019
 To: Washington State Parks
 From: Mark Daniel, Jenni Creveling
 Project Name: St. Edward State Park EIS
 Watershed Project Number: 180908

Subject: EIS Public Scoping Meeting Summary

On Tuesday, August 13, 2019, Washington State Parks hosted a public EIS scoping meeting in regards to ballfield improvements proposed by the City of Kenmore at St. Edward State Park. The meeting was held from 6:00 pm to 8:00 pm, at Kenmore City Hall. Based on the meeting sign-in sheets, 38 people attended the meeting.

The following individuals staffed the meeting:

Table 1. Meeting staff.

Washington State Parks	Jessica Logan, Jolene Boyd, Steve Brand, John Ernster, Linda Kunze, Daryl Kline, Jessica Norton, Shawn Tobin
City of Kenmore	Debbie Bent, Bryan Hampson
The Watershed Company	Jenni Creveling, Kyle Braun, Katy Crandall, Mark Daniel
Herrera, Inc.	Matthew Fontaine
Vicki Morris Consulting Services	Vicki Morris
Robert W. Droll, Landscape Architect, PS	Robert Droll

The meeting space included a welcome table, several posters placed around the room, and a projector displaying the meeting agenda. Comment cards were available at the welcome table and at tables near the posters. The posters addressed the following topics:

- Environmental Impact Statement process
- Elements of the environment (meeting attendees were asked to place dots on elements of the environment they thought should receive focus in the EIS; the results of this activity are shown in Figure 1, below)
- Alternatives to be considered in the EIS
- Environmental context
- Proposed usage schedule for the fields
- Field lighting

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 Scoping Meeting Summary
 August 14, 2019
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- Field surfacing
- Stormwater management
- Parking
- Current Washington State Parks Land Classification and Long-Term Boundary Map for St. Edward State Park

Brief presentations were given by Jessica Logan and Debbie Bent between approximately 6:15 pm and 6:45 pm. Jessica began by welcoming the attendees, providing an update regarding the status of the proposal and the environmental review process, and discussing EIS fundamentals. Next, Debbie provided an overview of the City's proposal for ballfield improvements. Jessica then discussed the EIS scoping comment process and next steps, and took questions from attendees. The remainder of the meeting was conducted in an open-house format. Attendees were encouraged to view the posters, ask questions of meeting staff, and complete comment cards.

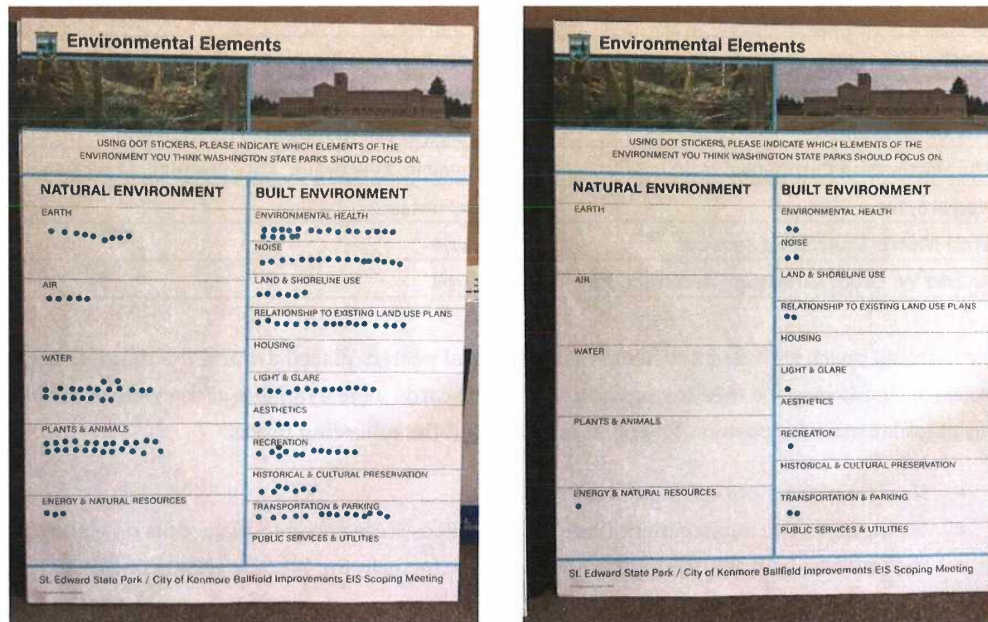


Figure 1. Results of Environmental Elements dot activity (note that there were two identical boards for meeting attendees to place dots on)

Appendix B

**SESP LAND CLASSIFICATION & LONG-
TERM BOUNDARY MAP**



Appendix C

EIS SCOPING MEETING COMMENTS

St. Edward Ballfields Public Scoping Meeting

Held on August 13, 2019 at Kenmore City Hall

Negative Impact Concerns on Elements of the Environment:

Natural Environment – plants and animals, people

Built Environment – environmental health, noise, relationship to existing land use plans, light & glare, aesthetics, recreation, historic & cultural preservation, transportation & parking

The City of Kenmore's proposal should be rejected. The built environment proposed does not fit with the purpose of State Parks. The parks should be a respite from the urban environment of hurry, noisy, too close to each other that people are coping with.

Today I went to St. Edwards and observed who was using this grassy area. There were 10-12 young adults sitting on the grass discussing something. A mother and her 3 elementary age boys had a snack at the picnic table then went for unstructured play on the grass. There was a group of 5 adults at the eastern edge of the grass maybe picking berries. Three diverse age groups using this area in their own way.

Preliminary list of alternatives:

No – artificial turf with field lighting

No – artificial turf with no field lighting

No – improved natural turf field with field lighting

2nd choice – improved natural turf field with no field lighting

Best – No action

Adverse effects on animals and birds! Night hunters like owls and bats.

Other comments on the proposed renovation:

Kenmore should build the fields on their own park land, not the state park.

Negative Impact Concerns on Elements of the Environment:

Natural Environment – Earth, plants & animals

Built Environment – Environmental health, noise, land & shoreline use, light & glare, aesthetics, transportation & parking.

I am very concerned that the ballfield as proposed would remove the very quality we go to St. Edward State Park for. Ballfields are available nearby in municipal settings. We need to preserve and protect spaces such as the natural field. I will be following this proposal as I have since 2008 when the WA STATE PARKS Commission voted on a same proposal by Kenmore saying it was not an appropriate location for such a complex. This is still true. Thank you for having the public meetings.

Other alternatives that should be considered:

(blank)

Other comments on the proposed renovation:

(blank)

Negative Impact Concerns on Elements of the Environment:

Natural Environment – Earth, water, plants & animals

Built Environment – Environmental health, relationship to existing land use plans, light & glare, aesthetics, recreation, historic & cultural preservation.

I am concerned about the impact this project would have on existing programming within the park. Environmental programs including those by Camp Roots Forest School and Wilderness Awareness School utilize the ballfield in its current state daily, throughout the year, and the proposed ballfield renovation would eliminate much of the field's usability for these programs. Participants in camp Roots spent 300+ program hours in this field in the 2018-2019 school year, exploring the mud; flowers; tadpoles and salamanders; ice and snow; and many species of birds that visit or nest in the field and adjacent wetland. The field in its current semi-natural state provides incredible learning opportunities that are not found elsewhere in the park, particularly due to the wetland. There would also be many opportunities for this field and wetland to be beneficial to the new Environmental Education and Research Center for wetland studies. The proposal also is contrary to both the natural and historical aesthetic that the park is supposed to maintain.

Other alternatives that should be considered:

(blank)

Other comments on the proposed renovation:

It would displace current recreational and educational use for the benefit of a limited population of organized sport field users, not to mention the impacts on the wetland, which deserves a proper buffer area to protect and promote the species that live and grow there.

Negative Impact Concerns on Elements of the Environment:

Natural Environment –

Built Environment – Environmental health, land & shoreline use

The field currently is used by educational programs like camp roots and wilderness awareness school. Additionally, UW Bothell has an environmental educational center going in that would benefit from access to the natural field. Additionally, the space is currently used by families for picnics, sports, and casual recreation. Converting the area to a turf field does not diversify use of the land, it restricts it. Specialization ≠ diversification. Camp Roots and wilderness awareness groups log hundreds of hours of environmental training hours each year. 270 children used the space for camp roots alone last year. A turf makes this space unusable for these programs.

Other alternatives that should be considered:

No ball field.

Other comments on the proposed renovation:

(blank)

Negative Impact Concerns on Elements of the Environment:

Natural Environment – Air, water, plants & animals, energy & natural resources.

Built Environment – Environmental health, noise, land & shoreline use, relationship to existing land use plans, light & glare, aesthetics, recreation, historic & cultural preservation, transportation & parking.

Wildlife: a great diversity of native wildlife occur at St. Ed. The following are concerns: wildlife disturbance of noise, night lighting, habitat loss for species that use the field, loss of wildlife viewing experience for those who view wildlife (e.g. deer) on field. Impacts of “edge species” (e.g. crows) that will be favored by the dwel.

Social Justice concern: reduction in the natural environment experience of WA State residents of Seattle area – this is the best example of native forest in the area. Impacts to existing users: [illegible] recreationists, Camp Roots, W.A.S., others. Impacts to future Environmental Education and Research Center; ballfield development would negatively affect education programs. Artificial turf impacts to water downstream. Waste disposal of synthetics when turf wears out. Carbon footprint and loss of carbon sequestration of grass field. Traffic congestion from games/events. Air pollution from above. Wetland suffer loss. Fencing impacts to wildlife movement.

Other alternatives that should be considered:

1. Artificial Turf with Field Lighting
2. Artificial Turf with No Field Lighting
3. Improved Natural Turf Field with Field Lighting
4. Improved Natural Turf Field with No Field Lighting
5. No Action – how the field is used now (no lighting, existing grass)

All alternatives except the no action alternative have negative impacts. The 4th alternative would have relatively small impacts. The items 1-3 would have serious impacts.

Other comments on the proposed renovation:

I urge State Parks to adhere to its mission of serving the interest of all the citizens of the state, nd not a local special interest. This park is a completely unique resource for residents of the whole Seattle metro area, who can experience a truly exceptional ecosystem and much of its biodiversity intact. This is within reach of everyone, not only those who have the resources or time to go to Mt. Rainier etc. and see this as part of a social justice issue, as well as an environmental one.

Negative Impact Concerns on Elements of the Environment:

Natural Environment –

Built Environment –

(blank)

Other alternatives that should be considered:

(blank)

Other comments on the proposed renovation:

I think that the project should proceed, because I have to go to Woodinville to play soccer. If this field were put in, the I would be able to ride my bike to it and play, instead of having to drive to Woodinville.

Negative Impact Concerns on Elements of the Environment:

Natural Environment – Earth, plants & animals

Built Environment – (none chosen)

My concern is the field in its current state is detrimental to the surrounding environment. Silt run off, mowing, herbicides etc. have a direct path to the wetlands. A turf field solves this issue.

Other alternatives that should be considered:

(blank)

Other comments on the proposed renovation:

I have no concerns with a turf lit field from any of the listed check boxes. Most if not all have already been addressed. Our community needs usable athletic fields. The field already exists in disrepair.

Negative Impact Concerns on Elements of the Environment:

Natural Environment – (none chosen)

Built Environment – Recreation

I support moving forward with this process. An artificial turf field with lighting will enhance the community. We can protect wildlife at the same time by limiting to 9 pm. In short, please go forward with the process.

Other alternatives that should be considered:

Yes – Artificial Turf with Field Lighting (the City's preferred alternative)

Other comments on the proposed renovation:

Please know my POV is to go forward with the proposal.

Negative Impact Concerns on Elements of the Environment:

Natural Environment – Plants & animals

Built Environment – noise, light & glair, transportation & parking

The habitats of our native animals are already being encroached on by human activity, affecting their ability to survive. St. Edward has been a tranquil place within our urban area to hike, walk and rejuvenate. I'm afraid adding popular spectator athletics to this space is going to negatively affect this already diminishing tranquility. It is a rare treasure for the people of our state. Having lights for a ballfield at night, not to mention the lights of cars would also harm animals, especially bats. I am concerned about the increased traffic and potential traffic bottlenecks with increased volume of cars at night.

Other alternatives that should be considered:

I strongly prefer the no action alternative!

Other comments on the proposed renovation:

Why is the council continuing to use our tax money for repeated EIS studies when the preceding studies don't meet their purpose? Is there no check on council behavior that is wasting our money when there are actual needs going unfunded.

Negative Impact Concerns on Elements of the Environment:*Natural Environment* – (none chosen)*Built Environment* – Land & shoreline use, relationship to existing land use plans

We, the other users of this land, don't want it built at all. If the State Parks allow it to be built anyway, then it should be built so that in the off season it can be removed to allow other usage of the land and for recovery of the field's vegetation.

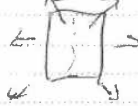
Other alternatives that should be considered:

Ok – Improved Natural Turf Field with No Field Lighting

✓ - No Action – how the field is used now (no lighting, existing grass)

Current plans show a drainage basin which apparently is to limit the flow downstream to a rate not exceeding the current winter rate.

The existing flow shown below



is replaced by



which will more than double the flow to the south

Other comments on the proposed renovation:

I'm skeptical that this is sufficient.

Negative Impact Concerns on Elements of the Environment:*Natural Environment* – Water, energy & natural resources*Built Environment* – Relationship to existing land use plans, recreation

There is a severe shortage of ballfields in Kenmore. Both our city and the number of young people are growing. This an existing ballfield at St. Ed – it has been used for baseball, softball, soccer and cricket for decades. It has been unmaintained and is now in dangerous condition for the health and safety of the children. We simply don't have any other available open space in Kenmore to develop safe and usable ballfields. In the Northwest – artificial turf and lighting are the only feasible way to re-develop these fields. For the majority of the year there is not enough natural light to effectively run youth sports programs. And natural grass fields are not durable enough to support the necessary use

Other alternatives that should be considered:

No. Artificial turf and lighting is the most logical use.

Other comments on the proposed renovation:

What a great opportunity this is to add value to Kenmore families. Every other city in East King County has multiple city owned or managed ballfields. See Bothell, Kirkland and Woodinville as examples.

Negative Impact Concerns on Elements of the Environment:*Natural Environment* – (none chosen)*Built Environment* – (none chosen)

(blank)

Other alternatives that should be considered:

Our kids NEED fields! Artificial turf with lights is best. Field space is extraordinarily limited and inhibits families ability to participate as practices and games don't fit into schedule or we have to drive out of our way to make. Please ADD fields!!

Other comments on the proposed renovation:

(blank)

Negative Impact Concerns on Elements of the Environment:

Natural Environment – (none chosen)

Built Environment – Environmental health, recreation

Recreation – unpredictable surface concerns for injuries, holes in grass, rocks in infield. Black bits of astroturf not healthy for the body. Lights could provide safe exercise area for housing occupants.

Other alternatives that should be considered:

(blank)

Other comments on the proposed renovation:

(blank)

Negative Impact Concerns on Elements of the Environment:

Natural Environment – (none chosen)

Built Environment – (none chosen)

No concerns! Please move forward with the artificial turf AND lighting option ASAP. Four our kids!!

Other alternatives that should be considered:

*Artificial Turf with Field Lighting (the City's preferred alternative)

Other comments on the proposed renovation:

Our kids and our community need this project to move forward. It'll be an asset for years to come that will benefit Kenmore in numerous ways. Thank you for your efforts to make this a reality.

Negative Impact Concerns on Elements of the Environment:

Natural Environment – (none chosen)

Built Environment – (none chosen)

I am comfortable with the level of studies and analysis that has already been completed by the State Parks and the City of Kenmore. Let's not forget this last 15 years of info that has been gathered already.

Other alternatives that should be considered:

I think it would make sense to evaluate all of the options. While I am supportive of the city plan I think we are at a point that all options are worthy of consideration.

Other comments on the proposed renovation:

What gets lost in this process is the historical use of the site (many decades of ballfield use). It is time to move this forward with a reasonable update to the fields and the use. Even the C.A.M.P identifies the space as being for active recreation. It is a shame that the deterioration of the fields has been allowed to happen. This is an extremely small % of the entire park and I do hope reasoned approaches will be considered.

<u>Negative Impact Concerns on Elements of the Environment:</u> <i>Natural Environment</i> – Plants & animals <i>Built Environment</i> – Light & glare I am 9 years old and I go to Camp Roots at St. Edward Park. We spend a lot of time in the field and we've seen a lot of interesting animals in the field and the wetland area. If you take out the field there will be fewer animals there and the animals that have to live there like tadpoles will die because they can't live on fake grass. The big lights might also harm nocturnal animals who need the dark. Please protect the field and wetland. Thank you. <u>Other alternatives that should be considered:</u> (blank) <u>Other comments on the proposed renovation:</u> (blank)
<u>Negative Impact Concerns on Elements of the Environment:</u> <i>Natural Environment</i> – Earth, air, water, plants & animals <i>Built Environment</i> – Land & shoreline use -Artificial turf consists of plastic that will break down and micro particles will enter the natural environment. -Artificial turf recycle is estimated at less than 20% resulting in more plastic in the environment (likely landfill). -Field is a water buffer that helps maintain water flow in the seasonal flow. Changes to the buffer will impact eco-system. -Plastic produces no O₂ (oxygen). Will likely generate undesirable gases as the artificial materials break down. -Why is a lease involved instead of a co-operate use arrangement? <u>Other alternatives that should be considered:</u> Consider changing "natural turf" to non-grass flowering vegetation that will "feed" bees, butterflies and other insects. Suggest clover. <u>Other comments on the proposed renovation:</u> -Thank you for considering multi use of the fields. (soccer, baseball, cricket, etc.). -How will varied use be shared to avoid conflicts of simultaneous use? -Why hasn't financial impact been estimated. Current vs. future maintenance. Cost to operate...electricity of lighting? Tax payer impact. Organized sports tends to charge participants and operates with volunteers. -Insufficient parking even with expanded parking spaces. Metro does not serve the park or St. Thomas.
<u>Negative Impact Concerns on Elements of the Environment:</u> <i>Natural Environment</i> – (none chosen) <i>Built Environment</i> – (none chosen) I have 2 comments on the Determination of Significance announcement. In the description of the proposal there are 2 areas that are confusing. 1. It says it will "include a <u>new</u> public sports field..." This doesn't seem accurate. It isn't new. The ballfield has been present for decades. It is being renovated. 2. It says "field designed to accommodate 2 little league fields, 2 youth soccer fields, 1 full-sized soccer field, <u>or</u> 1 full-sized cricket field. This makes it sound like we only get 1 of the 4 options. I think it would be more accurate to say it is a multi-purpose field where any of the 4 activities could be played but at different times.

Other alternatives that should be considered:

I am a Family Medicine Doctor. Sports and exercise are important to people over their lifetime. This habit often starts in youth. To maximize benefit we need good drainage to extend field use. We need lights to extend the field use.

Other comments on the proposed renovation:

(blank)

Negative Impact Concerns on Elements of the Environment:

Natural Environment – (none chosen)

Built Environment – (none chosen)

The idea of renovating and establishing year-round use of fields that have historically been at Saint Ed's is a great idea, not a negative!

Other alternatives that should be considered:

This is a good range of alternatives. I think the top two are the most viable alternatives. (Artificial turf with field lighting and artificial turf with no field lighting).

Other comments on the proposed renovation:

Very supportive – for numerous reasons:

- Kenmore has a lack of usable, quality ballfields for kids.
- This is a historical use – and it makes sense to improve dilapidated fields, at no cost to State Parks.
- This is a 3.5 acre parcel in a 300-acre park – there's plenty of room to accommodate natural space and solitude and have functioning fields, too.
- This project has numerous environmental benefits (synthetic fields = no water/fertilizer) and Kenmore proposes to mitigate impacts.

For most Park users, permission is given for a limited time, and the Park is available for other users the rest of the time. But in this case, the permission is unlimited, even when Little League is not in season. I oppose this proposal, and request that the State rejects this proposal.

Look @ Street lighting upgrade. Bastyr road connection. Usage schedule creep following lease agreement.

August 13, 2019

Jessica Logan
Environmental Program Manager
Washington State Parks and Recreation
1111 Israel Rd SW, Olympia, WA 98504-2650
E-mail Jessica.logan@parks.wa.gov

RE: St. Edward State Park, Kenmore Ballfield's lease/proposal

Dear Jessica:

This letter is submitted in response to the Washington State Parks and Recreation Commission request for comments on the scoping DEIS on the Kenmore ballfield proposal to renovate and lease for 20 years the historic ballfields at St. Edward State Park. The plan for ballfields builds upon the Parks Commission's earlier decision to lease and renovate the seminary building to Daniels Real Estate.

A. The DEIS should evaluate the total cost of each of the alternatives. This cost should describe the sources of monies for the renovation and on-going upkeep monies—and whether there is a public/non-profit partnership involved. It is important to include in the upkeep costs, the replacement cost of the turf field which I understand must be replaced after a number of years' use.

B. The DEIS should analyze a reasonable range of alternatives to attain the Park's Commission's general desire to renovate the ballfields for "a variety of organized and unorganized recreational events...including blocks of time for unscheduled field uses." *See specific applicable items St. Edward State Park Management Plan pg. 18-19 items 1, 3, 6,7,10 See Ballfields for complete list of 11 items.*

Add to the current proposed list two new alternatives. The first alternative is evaluate design of the ballfield improvements that will require rehabilitation and enhancement of the full required wetland buffer adjacent to the ballfields(the area currently mowed) with no requirement for a variance. This wetland/ buffer area is labeled Natural Resource Recreation on the St. Edward Map. It is possible that mitigation of the actual wetland would be required and the size of the ballfield(s) reduced. This alternative would include a grass turf field, and no lighting. *See St. Edward State Park Management Plan Ballfields items 6,&9. pg. 18-19. And policy #3 under Natural Resources.*

A second additional alternative is to evaluate additional community recreational facilities i.e. at school sites available to the local government(Kenmore) for field use for competitive sports. . *See St. Edward State Park Management Plan Ballfields item 11. pg. 18-19 .*

C. The DEIS should analyze all significant adverse impacts including cumulative impacts from both the Daniels proposal and the current ball park proposal. The impacts include the magnitude of the changes in the character of the park and their effects on the park users in keeping with the historic status and intended use of the property for passive outdoor recreation. These adverse and cumulative impacts include:

-Traffic Impacts. Any and all impacts related to the increased traffic from the ballfield uses (and the Daniels project) should be analyzed including impacts to pedestrians and hikers, bicyclists traveling to, from, and within the park. Increase in parking should be included in the cumulative impact analysis.

-Noise. The ballfields intense use and extended hours of use is likely to generate significant noise associated with the increased number of events (Daniels) negatively affecting existing park users and wildlife, and the quality of the park environment.

-Light and Glare: The ballfields intense use and extended hours of use with lighting is likely to generate significant light and glare associated with increased number of events(including Daniels) negatively affecting existing park users and wildlife—particularly wildlife associated with the wetland . Any impacts arising from development activities must be avoided or mitigated on-site including those related to light-sensitive bats. Include a complete evaluation of compliance with the St. Edward State Park Management Plan item 9 Field lighting which states that: Field lighting is not recommended.

D. The DEIS should evaluate all impacts to Wetlands and other Critical Areas. The Commissions' Comprehensive Natural Resource Management Policy (August 2010 73-04-1)

10.Wetlands – “ minimizing functional impacts to them and the processes they perform... to ensure no net loss in the acreage or function of the State’s wetlands)

The DEIS must include a technical existing drainage and hydrologic analysis for Wetland A and specific details regarding materials and systems that will manage ballfield related stormwater quality and quantity. The DEIS must, in addition, include specific design features that will be incorporated into the proposed subsurface drainage system (of any of the alternatives where applicable) to ensure that stormwater flow and drainage will flow toward the east and to Wetland A.

There is currently no technical evaluation or substantiation of Existing Wetland Hydrology and Drainage. The Perteet 2017 athletic field stormwater drainage

plans do NOT contain any existing –condition , stormwater drainage or hydrologic analyses(e.g. seasonal flow/run-off rates or volumes) for Wetland A. An email dated May 11, 2017 from Mr. Paul Anderson (Department of Ecology) to Ms. Linda Kunze (Washington State Parks and Recreation Commission) referring to the ballfields confirms the existing condition of the fields and the importance of drainage to Wetland A.

“ ...In terms of drainage for the ballfield upgrade, I was so glad you raised that question during the site visit as it is an important element in maintaining hydrology to Wetland A. Since it appears that the current ballfield is crowned to promote drainage to the ditches on the west and east sides of the field, it is important that project improvements do not reduce the amount of water that currently reaches Wetland A...”

E. Effects of Climate Change . The effects from climate change on the park natural resources, the land, and in particular the wetlands should be examined for all alternatives in this DEIS.

With the increased potential for reduced water to the wetlands, warmer temperatures and reduced rainfall-- the importance of maintaining an adequate flow of water to Wetland A is increased. Changes to climate may also effect the wildlife, the vegetation surrounding the playfields, and the current soil hydrology.

Thank you for your consideration of these comments. You may contact me at the following address and phone should you have any questions.

(The following is supplemental to the previous letter)

Negative Impact Concerns on Elements of the Environment:

Natural Environment –Earth, air, water, plants & animals

Built Environment – Noise, land & shoreline use, relationship to existing land use plans, light & glare, historic & cultural preservation, transportation & parking.

Earth & Climate Change

Water-Wetlands: Wants study for all alternatives

- Current run off from field into wetlands

Plants & Animals: The bats

One of the alternatives should be (mowed buffer) shrink size of recreation area w/ proper wetland buffer (NO variance)

- Consistent w/ State Parks policy/CAMP
- And Kenmore's own code.

Need restoration of wetland and establish an adequate buffer! Look at cumulative impacts WITH the Daniels project!

- Parking not adequately assessed under Daniels project.
- What about bike, traffic affected by this?

Other alternatives that should be considered:

p. 18-19 CAMP

- Blocks of time for unscheduled use
- Natural grass is preferred
- Field lighting not recommended
- Should be local government responsibility

Should adhere to CAMP and Commission Policies!

p. 24 CAMP

- Relocate facilities to protect wetlands
- Natural resources policy D.1! (relocating facilities)

7) Climate change – reduced water into wetlands + higher temps. How will this affect these changes. Should expand site analysis. How will all the areas surrounding the field intertwine. Not an isolated area.

8) Turf field w/ major events not consistent w/ intent and use of the park.

Other comments on the proposed renovation:

- 1) DEIS should evaluate total cost of each alternative & describe source of funding for construction and long-term maintenance.
- 2) Add 2 alternatives: **a)** Decrease size of ballfield and provide full buffer required to protect wetland. Even today is currently mowed. This area should be protected. Potential to relocate field. **b)** Look at additional community facilities for outside sport sites outside of the park.
- 3) State Parks should look at this carefully as it can set a precedent for local governments to use our parks as sport facilities.
- 4) Look @ cumulative impacts w/ Daniels project (light, noise, traffic, bats)
- 5) #1 concern is WETLANDS! DEIS must use technical studies to determine current drainage into wetlands and how each alternative will affect this. Need to know the baseline. Explain how the field will drain and affect adjacent wetlands.

6) Need to use current Ecology Stormwater requirements. 2017 Pertett study inadequate.

August 13, 2019

Washington State Park and Recreation Commission and Staff
Olympia, Washington

Dear State Park Commission Members and Staff,

My name is Keith Dunbar, a neighbor, 30 year resident of Finn Hill, and a frequent user of St. Edwards State Park. Professionally, I am a retired Chief of Planning and Environmental Compliance for the Pacific West Region of the National Park Service, with 35 years of service. I currently volunteer for the Ice Age Floods National Geologic Trail and am involved in the evaluation of a pilot National Park project on the Tibetan Plateau of China.

We are truly blessed to have a “national system of parks”, (a term coined by a previous Director of the National Park System); National Parks, State Parks and municipal and county parks, that serve the citizens of our Nation by providing for publicly protected spaces that preserve our natural and cultural heritage, scenic landscapes, and provide a variety of passive and active recreational activities and experiences for our citizens.

Each park in our national system of parks provides a unique benefit that frames our experience in that place. So too does each level of government have an important role to play in the park experience they provide to our citizens. National Parks preserve special places of national importance because of their unique natural and cultural attributes, and provide for an appropriate level of public use and enjoyment. State Parks across the nation also protect important natural and cultural resources within each state, and provide for an appropriate level of recreational use, both passive and active, while ensuring that park values are upheld.

Local parks, which are established and funded by municipal and county governments, or special park and recreation districts, provide a critically important third tier of public park lands that provide valuable open space, promote a wide variety of recreation

uses close to home, and protect various natural and cultural features that are deemed important to local communities.

What concerns me is the proposal for the City of Kenmore to utilize the informal grass ball field at St. Edwards State Park for formal organized ball field use complete with artificial turf and lighted space, including occupying the fields until 9 p.m at night, well after the traditional dusk closing of the State Park.

This proposal is imposing what is more a traditional local municipal organized recreational function upon a unit of our State Park System. Synthetic turf and lighted ball fields are not an appropriate use of a State Park. It is a municipal park function that belongs on fields that are owned and operated by the City of Kenmore, or an established local park and recreation district, either of which would have the taxing authority to establish levies or issue bonds to generate local government funding to advance active recreation and other park related activities and functions within the community.

Much like the agreement that Lake Sammamish State Park has with soccer organizations in the Issaquah and Sammamish area, grass, unlighted fields at the State Park are leased and utilized during certain times of the year for active recreation use. However the integrity of the state park is maintained, and the surrounding natural environs of the park are not as heavily impacted.

I would urge the City of Kenmore and the Washington State Parks and Recreation Commission to reach a compromise accord where an improved grass field can host some local organized recreation while not impinging on the integrity of a valued State Park.

I also urge the City of Kenmore to aggressively pursue land acquisition opportunities elsewhere in the Kenmore community for the future development of active recreation field space where artificial turf surfaces, lighted fields and other related amenities are more appropriate and welcomed.

Appendix D

REDACTEDⁱ EIS SCOPING COMMENTS

ⁱ Comments have been redacted to omit personal information.

Saint Edward Ballfields Website Comments

08/01/19 – 08/30/19

I am not in favor of artificial surfaces, lights, additional crowds on the currently natural fields. And the extra traffic that will come with the improved fields added to the Daniel's Real estate renovation of the building the traffic will make the area unusable.

Lets deal with the hotel and its impact for a few years before we add another project that will choke the area too death. Less is more....common sense should prevail please!

I am aware that this is a controversial project; however, due to the significant increase in population, this project is necessary. A high priority is the health and wellness of our community, and physical activity in the form of sports allows us to achieve this priority. Even those who spectate at the games will receive a health and wellness benefit in the form of community connections and socialization. The field site is environmentally sensitive area, but I'm confident the mitigation plan will offset the impact. If lights are deemed not to interfere with the abundant wildlife in the area, than I fully support having lights. The field improvements are necessary in any form, whether that be grass or synthetic.

I think the ball field improvement is a bad idea, especially in light of the fact that the hotel isn't finished yet and we can't say what the traffic and parking impact will be from that project. If McMenamin's in Bothell is any indication it's going to be very busy and parking will be a nightmare for those of us who use the park for hiking and biking.

I ride my mtn bike in the park a lot and parking is already a challenge on weeknights and weekends, especially when the weather is good and the hotel isn't finished yet. This would be a great way to turn people off from buying a discover pass if forced to park at QFC or down at BFH.

This project needs to wait. Kenmore should lease land from the golf course.

Hello,

I strongly support this project to improve the sports fields at St. Edwards in the interest of health and recreation on the east side. I am a state park pass holder and visit St. Edwards on a regular basis to walk my dog, attend concerts, and participate in events like the Family Jewels Pie K race. I think these improvements are beneficial to Kenmore residents and others and that any environmental impact can be fairly easily remediated. Please contact me if you have any questions about this comment.

Please consider improving the ball fields at St. Edwards Park. We have been with NLLL for two years and the fields we typically play on at Bastyr are in terrible condition. Wa State Parks would have a consistent tenant at the improved ball fields from March through the summer, making it a profitable investment. This is a great opportunity to build visibility to the park for other uses as well. Our boys would love to be proud of the fields they play on and as a league would appreciate the opportunity to present our league in a positive light. New fields would enable us to do so!

This project would be a great addition to the community and a great improvement to the park.

The project calls for 4 fields that could be used simultaneously. This would mean at peak capacity the field need to host 4 soccer and 4 baseball teams + spectators. The teams alone would require around 120 cars not counting spectators. The project calls for 60 parking spaces which is less than adequate and will eat into park's parking space. There is no road traffic mitigation in this project as the road is narrow. This will also cause impact on neighboring streets especially already busy 68th ave and the river bridge north of the park.

State Parks approved the Lodge in spite of many residents concerns about traffic and parking. Assumptions were made regarding those issues that may or may not be true. How about we finish one project (The Lodge) and find out what impact that has before proceeding with another project which will also affect parking and traffic.

We do not need field improvements and the attendant lighting, seating, parking, traffic, etc. We already have Bastyr and the Lodge is soon to enter service. Enough please. The park is yet a haven - let's leave it that way.

Go to Lake WA sch district -- Finn Hill Jr High where the track and football field are poorly maintained and underutilized; where two ballfields are also poorly maintained (now being re-done) and underutilized.

Hello,

I've lived in the Kenmore area for the last 15 years with my wife and three kids. We use the Bastyr fields constantly for soccer, softball and baseball. I fully support the upgrade proposed for Bastyr fields. It will enhance the experience for the kids playing on the fields, parents and family members watching and improve the overall community feel.

Keep up the good work.

I am a 40 year resident of Kenmore. My husband and I raised two daughters here. They were both soccer players from about the age of six through age 17 and played on all the fields surrounding Kenmore. During the 1990s and early 2000s they played recreational soccer and went to soccer camps at St. Edward Park during the summer. The field was often rough and sometimes hazardous from overuse. As the population in the area has increased, I can only imagine the overuse of the fields has become worse.

I preface with these comments, but I want to stress I do not support the city of Kenmore's decision to develop the fields to the ultimate extent shown (with lights and artificial turf, grandstand, etc.) I would support regrading, adding drainage, and replanting with grass.

The park is going to be degraded significantly by the hotel complex in the seminary building, the added traffic in the evening and additional parking needed for conferences and events. We must protect as much of the remaining park as possible for activities that do not disrupt the animal and plant life any more than they are now. This park is a natural gem in the middle of an area becoming highly developed.

A ball field could go on an old parking lot or on the site of retail stores being phased out, but you cannot recreate wild second or even third growth forest and its ecosystem on such a site. Please do not approve the full scope of "improvements".

CITY OF KENMORE:

I was one of Kenmore's first planning commissioners. My son played little league baseball. I understand the sports field lobby is well organized and strident. I also know formal sports fields with lots of chain-link fence and other unwelcoming features benefit only a niche population and sit vacant most of the year. Sports field using organizations and field owners are hidebound and resist cooperating with each other to efficiently use existing sports fields. Near-professional quality fields are unnecessarily demanded for children and other amateurs. The City of Kenmore should not further subsidize this never-satisfied special interest by renting land in a state park.

WASHINGTON STATE:

St. Edward State Park already has a university operating in its center and a new hotel will be opening soon. The presence of the university helped explain the need for the hotel. Each new project helps justify the next development project. "There is already a hotel, astro-turf, stadium lighting and lots of traffic, why not go ahead and add a road down to the lake shore and a boat ramp...?" The remaining wilderness in St. Edwards is irreplaceable and serves a much larger community than just Kenmore. Please do not continue to allow special interests to chip away at the park until its welcoming, natural feel is permanently gone.

I am in opposition to the City's preferred alternative renovation of the Saint Edward State Park ballfields for two reasons: One, I don't think artificial turf should be used in a natural setting like a state park. It will look inorganic and won't seem congruent with the rest of the park. Two, I am concerned about the destruction of the wetlands area behind the outfield. I believe this area should remain protected and that whatever renovation there is should take into consideration how we (as humans) should best live with nature in a way that is natural and non-destructive.

Based on the list of alternatives, my preference would be for: Improved Natural Turf Field with Field Lighting (so teams can play at night). This seems like the best way to maintain the field and also respect that it's in a state park where people come to be in nature, not look at a synthetic-fibers turf field.

Thank you for your consideration.

resident

mom of two

local business owner

Hello,

I would like to comment on the proposed ball field renovations at Saint Edward State Park.

I love the idea of rejuvenating the ball field and creating a space for multiple sports to co-habituate on the same field.

My proposition is to ask the state parks department to account for the growing sport of Rugby. The proposed field renovations call for a full-sized soccer field. A full-sized rugby field has the same width and length, so it would be easily adapted to rugby games with only a few additional lines to be added. The other ask in addition to lines, is field goal post, which can be removable, making the fields save for soccer, cricket, and baseball.

Rugby has been growing in the northwest since rugby's reintroduction into the Olympics as well as the success of the Seattle Seawolves, our very own professional rugby team which as won 2 consecutive MLR titles.

The Seattle area hosts multiple men's and women's rugby clubs as well as multiple youth club teams from high school down to elementary school.

Rugby fields are hard to come by, one being at Magnuson Park and another being in Redmond at Marymoor Park.

To grow the sport of rugby, we need to grow the accessibility of the game and get more young players involved. If we can provide a great field in a safe and wonderful environment, more youth programs can be generated.

To conclude this comment, I would like to add that with the addition of post holes to implant removable goal post. if these holes can get implanted, the goal posts can be provided by the local rugby clubs and managed so the parks department does not have to take on that responsibility.

I have included a link to rugby specific field dimensions for your convenience.

<http://assets.usarugby.org/docs/college/rugby-field-specifications.pdf>

Thank you for your consideration.

-Andrew Smith
Eastside Axemen Rugby Club

Relevant websites: https://eastsideaxemenrugby.wordpress.com/ https://www.rugbywa.org/ https://www.pnrfu.com/ https://www.usa.rugby/ https://www.panthersyouthrugby.com/ https://eastsidelionsrugby.teamsnapsites.com/
I think you should really consider the option of adding to the soccer field potential facilities for Rugby on the same pitch. This is a rapidly growing sport in the PUget sound region and potentially in the USA our Seattle pro team has built on an already healthy legacy by becoming national champions two years running and has been recognised by both the cities of Seattle and Tukwila and there is significant upward potential for rugby in the region. I don't think this would add a substantial fiscal burden to the current proposal. As the dimensions of the rugby and soccer fields are broadly similar just different posts and linings required. It would also potentially broaden participation and utilisation of the facility.
Provide soccer and rugby fields. Soccer is already big in the NW. Rugby is growing in regionally and nationally.
Additional marking for Rugby would be great.
Please consider a rugby field as well. This sport is growing rapidly in the U.S., especially in this area, considering that the Seattle Seawolves have won back-to-back major league rugby championships on 2018 and 2019.
With the rapidly growing rate of rugby as a sport in the states, I think it would be beneficial if you lined the new soccer field with rugby lines as well and/or added rugby posts to this new field. I just know how much rugby has done for me and adding just another plan soccer field won't be as beneficial if making it multipurpose

Good morning.

I have been a coach within the Northlake Little League organization for 4 years (2 kids, 7 total seasons). My family loves baseball. We love that we have had the opportunity to play at the renovated Moorlands field this year, as well as some of the other fields that are in decent shape, such as Bastyr and Forsgren. However, there are simply not enough good fields to support the league. We have had to rent dirt fields from elementary schools that do not provide an environment that is conducive to learning the game. I look at some of the fields in nearby Kirkland, Woodinville and Redmond and long to have fields like that available to my kids and my teams.

Not only would this enhance the experience for the area baseball leagues, but also softball, soccer and cricket. My family and I love St. Edwards Park and have spent countless hours there since moving here in 2014. We hope the city will decide to approve this project and give families the fields they need at a beautiful location that has the ability to support them.

Thank you

The other local little leagues all have turf fields and lighted fields. (Kirkland National, Kirkland American, Northshore, Woodinville, North Bothell.) Some have multiple options with fancy concession stands. Northlake little league has no turf fields, and our concession stand is a flimsy trailer with no power and recently had a rodent infestation. We need help! This is the perfect location in an urban growth area where it is hard to obtain property, and with the least amount of negative impact to the community (lights) and the environment (it is already a field, just not adequate for most sports). Our population is growing, and our kids and community members need more safe locations to play and practice sports, especially ones with lights so they can play in the after-work hours when parents are able to coach them. Field improvements in any location will elicit public concerns, but this one just seems primed to be perfect for our community with much less negative impact than any other locations in the area.

If lights are a concern for the bats, keep in mind that the lights go off, and bats still get their darkness just as they do in the summer months when the days are longer.

Thank you.

Please consider adding lines and rugby posts (which can be removed as necessary) to the ballfield improvement at Saint Edwards.

Rugby is the fastest growing sport in this country. Women's rugby is the fastest growing in the world. And it was included in the last Summer Olympics. Though it does not have the popularity of soccer, rugby is played in nearly every country in the world. The Eastside is home to three youth rugby clubs and one men's club. There is only one rugby specific pitch in

the entire Eastside and that pitch is heavily used by both soccer and lacrosse. It is also undersized for the sport.

In a time of "elite" athletics and increasing exclusivity, rugby is a sport that focuses more on developing a broader community, inclusive of everyone. It is a looked at as a means to grow children into well rounded adults.

Thank you for your time and attention

To Whom It May Concern,

I am a father of 3 kids living in Bothell and use St. Edwards for hikes, picnics and of course the toys. I have a 7 year old boy, a 5 year old daughter and a 3 year old daughter. We are in need of more fields for our kids. My 7 and 5 year old both play baseball and soccer and we are utilizing dirt fields at elementary schools that are a liability and difficult to schedule. I coached both of their teams this summer (baseball and T-Ball). Our T-Ball team was using a dirt/grass patch (not even a field) at Moorlands park as the older kids used the main field (only baseball field). This would be fantastic for our community and our children to have more options as well as better options for the kids and families. I greatly appreciate the City of Kenmore pushing to have these turned into turf fields with lights as this would enhance the experience for my children.

thanks for working to push this through!

I would love to see one of these fields be used for rugby.

Is it possible for a pitch to be made available for Rugby?

Rugby is one of the fastest growing sport in the US for many reasons, including because it is financially more accessible to more people than other sports requiring family investment in more gear), and also because it is equally played by boys and girls. So it's a very inclusive sport. But even though The Seattle Seawolves are #1 Major League Rugby team in the US, the sport is still under-represented in our area and grass fields where to practice are hard to find.

My son was hooked to it after he tried, and played for 3 years with the Eastside Panthers Youth Rugby club, but the club's practice had to move South (Renton), while we moved North (Bothell), and because of the geographic distance it's no longer practical to commute and he had to stop. There is demand in the North through, we know people in Bothell, Kenmore, Kirkland, who would like to give it a try and play.

Thank you for your consideration.

I am writing to urge you to REJECT the proposed "improvements" to the field at St. Edward State Park. Not only would this project significantly impact the delicate ecosystem and natural beauty of the park, the noise and crowds that ball fields attract would be detrimental to the peaceful atmosphere that park users enjoy. St. Edward is a unique respite in the midst of a highly populated area that has already seen deleterious amounts of unchecked development. Please preserve this natural gem.

I strongly oppose improving the ballfields at St. Edward's State Park. The role of state parks should be the preservation and appreciation of nature. Not only would the environmental impact of the field be great (this meadow, abutting wetlands is a home to wildlife), but the increased traffic would detract from the peaceful nature of the park.

Should more ballfields be needed, they should come from the community surrounding this park, and leave this field at the park as it is.

I would like to voice support for keeping the ballfields at St. Edwards park in their existing state, open to nature exploration and creature habitat. Each summer, the fields are filled with the next generation gently exploring native wildlife through camps and open adventures. This is critical to childhood development, appreciation for nature, and growing individuals who respect nature. The fields are a great place for this exploration because so many creatures use them as habitat. Artificial turf can be placed just about anywhere, but these critters and this habitat cannot be found just anywhere. Please leave the fields in tact and let the City of Kirkland find another, less sensitive, place to build artificial ballfields.

I believe this would be very harmful to the natural wildlife that already lives around the field at Saint Edward State Park. The harmful chemicals and disruption could destroy natural habitats and harm the wildlife. This State Park is meant for us to come enjoy the beauty of nature, not to come play sports. There are plenty of other options for creating a ball field, like local schools. But, a State Park is not a responsible decision. There has already been enough disruption to the natural habitats of the wildlife living at Saint Edwards, we don't need to create more.

Please DO NOT alter the ball field. The artificial turf and and construction process will harm the ecosystem of our park.

This is a STATE park and should not be taken over by the city of Kenmore. They have plenty of their own spaces/school fields where they could build an artificial turf field.

We've already lost part of the park to the Seminary being developed. Continuing to sell off parts of the STATE park to the highest bidder is unacceptable.

My children enjoy exploring this wilderness area and it is being ruined. Hundreds of children explore the wetlands bordering this ball field to learn about the ecosystem and you want to destroy it by covering it in plastic. More artificial turf is the LAST thing our earth or community really needs. Soon everything in this community will be pavement and plastic and subdivisions.

Please save our beautiful park!

To whom it may concern,

I ask you to please consider designating one of the two new fields to be used for a full rugby pitch. Seattle is one of the the growing hotbeds in American rugby. Having recently just won a national championship in 7's rugby (now an Olympic Sport) under sponsorship from the Washington Athletic Club. The Seattle Seawolves, Seattle's professional rugby franchise has also recently won it's second consecutive title, back to back in Major League Rugby (MLR). In addition to these two groups thriving, at the heart of it all is the Seattle Saracens. The Saracens (Seattle Club Rugby) have long been a pillar in the rugby community in Seattle and driving force for its growth in the area. Perhaps most importantly, youth rugby has grown substantially throughout Washington. Local club, Eastside Lions finishing a record third best at the USA Rugby High School Nationals. Many of these players hail from the Kenmore, Bothell, and Kirkland area. Unfortunately, all of these groups are consistently in need of quality grounds to train on, often having to use fields in less than below standard condition or using American football fields which were simply not made for rugby. With the state of Washington becoming the gold standard for rugby in America, the necessity for more quality fields for teams to play on, is of the utmost importance. St. Edward Park could be at the center of all this growth, should the state choose to consider a rugby pitch. Nothing would make me happier, having been a regular attendee at the park since childhood. Thank you for your time and consideration.

My daughter and I have spent considerable time at the field enjoying the natural grass, trees, and wetland areas surrounding the area. I'd like to suggest that the City of Kenmore look to other locations for ball fields including finding creative agreements with nearby schools to share field space.

Thank you

As much as I am in support of little leagues and sports I am not ok with the proposal of the renovation at st. Edwards state park. That field is not just a field but a habitat, a home, an amazing ecosystem for this park. The deer are often in that field grazing. Frogs and tadpoles and salamanders thrive in the wetland section of it. Birds, rodents, rabbits are part of it too and recently we spotted a fox out in that field. It is part of their home. There are also several forest school programs that utilize that field as it is to learn about nature, environments, habitats, homes, ecosystems, lifecycles. They easily spend well over 300 hours in that field learning. I think finding another place to build a field that would not be such an environmental and educational impact and disadvantage should strongly be looked into and reconsidered. The fields above behind bastyr could use some work and there would be less impact on current animal homes.

I am very upset to hear about the possibility of "improving" the historic ball field at St Edwards State Park. I live near the park and use it frequently to walk my dog, and to enjoy a place of natural beauty, peace and quiet. It is one of the few places in the area where one can really escape the busy, noisy world to meditate and enjoy natural sights and smells.

I shudder to think of a noisy ball park with bright lights, bleachers and artificial turf. There will also be more traffic and a shortage of parking, due to game spectators as well as the new hotel patrons. I also envision more accidents on the road in and out of the park where bikers cross the road and Bastyr students already speed in and out. There is also the question of how the wildlife in the park will be affected.

I don't understand why the city of Kenmore is controlling what happens at a state park. I thought that a state park was for all state residents and we should all have a say. I believe that there are as many or more Kirkland and Bothell residents who use St Edwards Park as Kenmore residents.

The park area available to the public has already been whittled away and reduced by Bastyr and the new hotel. Please do not allow the development of Little League baseball fields with all its noise and traffic.

Please consider one field as a dedicated rugby field. The sport is rapidly growing on the area and we really struggle for field assignments, soccer and lacrosse taking priority. Thank you!

First, Little League is likely a very wonderful opportunity for kids (I say likely only because I have zero experience with the organization, but it seems culturally beloved, so I'm going with it). Little League teams need and deserve nice spaces to play and build community.

HOWEVER.

I am deeply concerned that the particular field at St. Edward State Park that the City of Kenmore wants to lease and improve for such uses would not be an improvement at all for that particular habitat. It has a wetland adjacent to it, which H and I have seen frog eggs and tadpoles in. And the wetland isn't JUST adjacent, the field is an extension of the wetland. We've been there many times when the field is soggy wet because of the water seeping up through the grass. This is the wetland - Wetlands are not static entities that we can put boundaries around and call good. Wetlands NEED to grow and shrink as conditions change. They need this to be healthy, and the surrounding habitats need wetlands to be able to do this for those habitats to be healthy as well. I see that the proposed plan includes some kind of wetlands mitigation, but I'm not convinced that would be enough to counter the harm done by taking all that space away from the wetland. Additionally, adding flood lights is good for humans, but it's not so good for other critters. It disrupts natural cycles and can create situations where prey get little to no relief from being prey - in other words, it makes it easier for predators to hunt for longer periods of time, throwing the predator-prey relationship for some species out of balance.

At a time when the earth is sending us every signal that it needs more care from us, I feel strongly that a more suitable place can be found for little feet to run around bases. Let's find that different space instead of taking the wetland away from itself.

First, stop calling this an "improvement." This is not an "improvement" to the park. The ballfield you want to "improve" with bright lights and artificial turf is an extension of the wetland. There's a reason it's often soggy. To be healthy, a wetland needs to expand and contract with the seasons. To try to "fix" that soggyess would harm the entire wetland biome.

In addition, the bright lights will not improve the lot of the wetland creatures. Prey and predator alike rely on natural phases of light and dark to hide and hunt. Extremely bright artificial lighting, as well as mobs loud, shouting people in the evening will disrupt the feeding and resting patterns of the wetland creatures. You can't fence in noise and light. I have seen no plans to mitigate the effect of noise and light.

I grew up on Finn Hill and spent many happy hours exploring this park. And when I had a kid, even though I'd moved to Seattle, I made the drive so that he could also enjoy it.

I have no doubt that it's important for a lot of kids to play organized sports, but a healthy wetland is not the place to do that, nor will it be a financially smart place to choose, because keeping that field perpetually dry will be pricey. Find another option.

I'm a big fan of Little League, but I am against the so-called "improvements" proposed for the St. Edward Park field area. That field affords the exploration of mud, grasses, ice, cottonwood leaves & buds, tadpoles/frogs & salamanders, nests, animal tracks & scat, adjacent wetland, and much more. Being adjacent to a designated wetland area, and with some of the field itself as growing wetland, this field offers opportunities for learning that can't be found anywhere else in the park.

St. Edwards has long been a bounty of nature exploration in our metropolitan area that is becoming more and more scarce and therefore more and more VALUABLE. So many families, like mine, utilize this park as our escape to nature. My children have participated in several different camps held at the part that use this field and all it offers. To the casual observer, it is just a field. Please don't be a casual observer. Recognize it for the gem that it is and PRESERVE it.

NO to St. Edward Ballfields "Improvement."

These "improvements" to the field and wetland at St. Edward Park will permanently and perhaps irreversibly damage a much loved and fragile ecosystem which is home to and utilized by a wide range of wildlife. The wetland will be destroyed, as it cannot be effectively contained and maintain its integrity. The park is already being damaged by a hotel and increased traffic, please do not do further damage to this delicate natural environment. Please keep protected, open spaces open and natural.

Kenmore, we can do better than ruining our beautiful state park with a sports complex. Please save the natural green space and habitat to so many creatures and us humans! It will forever ruin the delicate ecosystems that live there. It is State Park Land to be preserved not turned into a sports complex. Kenmore can build something like this at one of the many local schools which would be a win-win for everyone. Inglemoor is just up the street.

Being adjacent to a designated wetland area, and with some of the field itself as growing wetland, this field offers opportunities for learning that we can't find anywhere else in the park.

Thank you for your careful consideration of our wonderful and unique natural habitat in our own backyard.

Please don't ruin the beautiful environment of St. Edward park by adding unnecessary sports fields. There is not enough parking to facilitate this renovation and there will already be an impediment to access nature at the park caused by the necessary renovation and subsequent use of the lodge building. This grassy field is used by animals as well as people and taking it away from grazing animals and insects to be replaced by monoculture grass (possibly fake grass?) is bad for the environment and the local wildlife. Let nature be nature.

Please do not take this natural area away from St. Edwards park by putting in turf!!! My child goes to summer camps here and loves to play and explore, I love to hike, run and bike through the trails. Our wetlands are precious, keep them natural!!

Our family participates in the Camp Roots programming at St Edward State Park and we are concerned about the plan for the East Ball Field. We feel this plan will ruin the delicate ecosystems that live there. We would like to save the natural green space and habitat to so many creatures and us humans. As State Park Land we feel it should be preserved rather than turned into a sports complex. We believe the city of Kenmore should build something like this at one of the many local schools instead. Thank you for your consideration.

Please don't replaced the field at St. Edwards with sports fields. My Son, who is nearly 5, has participated in many organized outdoor actives in the field at the park as a whole. The field provides a wonderful meeting space and an entry point to exploring nature. As a family we also visit St. Edwards park to enjoy a little bit of nature close to home. Rather than move spaces at St. Edwards toward development I encourage you to move them toward restored habitat. I understand that ball fields are also very important. I also highly value getting children outdoors to play organized sports. However, if more fields are needed please focus on areas that are already developed. Such as the space next to Bothell High School or Kenmore Elementary School. Please put a top priority on preserving natural spaces. Communities such as Kenmore, Lake Forest Park, Brier, and Bothell can work together to provide developed ball fields.

I oppose the ball field addition or anymore paving to St. Edwards Park. My child attended Camp Roots and I couldn't be more grateful for the opportunity and experience my child had. More children need this in their lives and this construction will hinder Camp Roots and all the good they provide our children. Please find another space.

Please do not move forward with this plan. There are precious few ecosystems intact in the Kirkland area and it is essential that we protect these for our children. If the issue is money/cost of maintenance, please reach out to the public to find alternative ways to protect this wild natural space. Thank you.

Please consider adding Lacrosse field lines so more sports are represented on this public ball field space.

I would like to voice my concern and opposition to the planned changes at the St Edward Park ball field. I live on the edge of the park and have spent much time in the park and on this field. The ecosystem there is far to delicate and fragile to support a ball field while still supporting the wetland plants and creatures that abide closest to the forest side of the field. Rather than creation of two ball fields I would suggest that the park and city restore this meadow to a more natural state which will benefit the adjacent wetland area and in a way that would best continue to provide beauty and learning opportunities to our residents (human, plant and animal).

My son Luca has been apart of Camp Roots for several years now. He just participated in the summer camp a few weeks ago. There is nothing like Camp Roots in the area. It is such an incredibly special program and school for kids... When my son was little we did the parent/toddler hiking classes and had the best time. We got to find tadpoles in the wetlands where the baseball fields are located. It was so fun and my son still talks about it! I hope the city reconsiders using the baseball fields for this reason. Wonderful memories are made from the kids and families that participate in Camp Roots and to take those memories away would be a shame.

Improve an existing space! Do not destroy the wetland!

We assume the park is a natural preserve specifically set aside and donated to the State to remain as a natural green space and not to be developed. Converting open space for organizing sporting events together with permanent non natural surfaces and structures for stadiums is no longer a natural park that preserves open space for habitat and future generations to enjoy. The proposal takes natural space and converts it to another use and creates unnatural runoff, releases more chemicals, adds impervious surfaces, creates excessive heat reflection, unnatural lighting, increases traffic with increased human impacts and adds more carbon emissions to the surrounding habitat and residential areas.

The recent hotel proposal approved for renovations of the historic buildings was made by developers to the public on conditions that the permit authorities would entertain no further development of the park. Now this artificial fields and stadium proposal, next it will be the University seeking a proposal to increase student enrollments requiring more development for classrooms and dormitories. When does the development stop, and what have the current park stewards done to protect this small, vital and remaining piece of nature in the middle of urban development?

Please reject the proposal and preserve the park as a natural environment and habitat. If Kenmore needs more ballfields, there are many other locations better suited with far less environmental impacts.

Please don't do this to St. Edwards. We don't need another ballpark. We need to preserve what remains of natural spaces where we can still view and interact with the real world. My six year old daughter went to camp here this summer. She came back dirty, engaged, happy, curious and protective of the natural spaces she spent her daytime hours. In retrospect, I spent my day in an office with no windows and reconditioned air. Please keep SE wild. I don't want my daughter learning about nature from a book or the internet.

As a resident living roughly one mile away I oppose enhancing the ball field at St. Edward's Park. The only reason why I agreed with converting the seminary to a hotel is because that was

supposed to be the limit of work done on St. Ed's and the rest would remain untouched outside of needed maintenance. Astroturfing the field and adding lights next to a wetlands will destroy the local wildlife and ruin the natural experience of the lands surrounding the field.

The city has school fields that can be enhanced, and there is a premier little league field less than a mile away at Big Finn Hill Park. The city can work with Kirkland to schedule times for fields to be used by both leagues.

Please do not improve the ball field at St. Edwards State Park.

I am NOT in support of making this modification. I am a Kirkland resident but I own a business in Kenmore and my daughter attends Camp Roots every year. We love this amenity as is and support use of it without allowing it to be designated for only single purpose like athletics fields. We are a diverse community and many of our families do not need a ball field, but do benefit from having green space to play and picnic, play frisbee, enjoy nature. Please do not further deteriorate the natural beauty of the park. The lodge is enough impact.

Thank you.

The fields desperately need improving and our community very much needs more services for sports, teams and groups within the community to come together. I'm tired of paying non-resident fees to participate in programs in Kirkland and Bothell. It would be a shame though for any synthetic turf to go into St Edward Park The hotel project is being handled respectfully. So should the State Park and environment our families are honored to have in our backyard.

Please leave the St. Edward's lands as they are, preserving the delicate ecosystems there. Summer camps, like Camp Roots, use these areas for teaching our youth about local flora and fauna, spawning, and stewardship of the earth. My son has grown up hiking, biking, and exploring all around the park, in and out of camps. He is excited to share his love of nature with other students next summer as a junior counselor. With the hotel going in, there will already be a less-than-healthy environmental impact, including increased vehicle traffic. Please do not move forward on this!

I do not support the proposal of the ball field renovation at Saint Edwards state park. The field is an ecosystem and provides a home for many critters and animals such as deer, birds, rodents, rabbits, frogs and salamanders to name a few. There are also several school programs that utilize that field all year round, the schools teach students of all ages about the importance of nature, environments, habitats, homes, ecosystems, animals and the lifecycles of nature. These classes easily spend well over 300 hours in that field learning and exploring in this natural classroom. Exploring other locations to build a field that would have less of an environmental and educational impact and disadvantage should strongly be looked into and considered. The fields at the local schools, for example, where there would be less impact on current animal homes.

I am directly opposed to making improvements to the ballfields at St Edwards for the purpose of having little league teams play there. This park is one of the only truly natural areas for

children to learn about nature and outdoor skills. There are so many other places for little league to have improved ballfields. Please leave St Edwards Park the natural space that it is. My sons have attended Wilderness Awareness and Camp Roots programs at St Ed's and it has been invaluable to their learning about the natural environment. Don't spoil this treasure!

I strongly disapprove of the destruction of sorely-needed natural green space for the purpose of yet another generic sports field, especially one that that replaces a natural environment for one with fake turf and floodlights, ESPECIALLY so near a wetland preservation area. State parks are supposed to be preserved for the enjoyment of ALL, not just those who play sports. With urban density increasing, we have never needed natural green spaces more, and we'll never be able to make more of it. This plan is foolish, short-sighted, and destructive.

My three children have used that playground extensively for learning about nature as part of the Camp Roots program. I think it will be a great loss to the park to have artificial lights and increased traffic in the area. We have seen coyotes in the meadow, and used it as an excellent example of a niche ecosystem within the greater park. Please preserve the natural space!

I support the state parks leasing fields to the City of Kenmore for Ballfield improvements. Children living in the city of Kenmore almost always have to drive to neighboring cities to find adequate fields to use. It's time for citizens of Kenmore to have fields to use as well. The number of children the ball field improvements would serve far outnumbers the number of people who use the fields in their current condition now. This would increase park usage and help get more children and adults outside playing.

Please don't destroy the ball field at St. Ed's! This is not an 'improvement' - it's a destruction of an amazing habitat that has provided so much joy and hands-on knowledge to kids. My son is in the Camp Roots program and this area is what sparked his love for science!

I do not think that any additional development of St. Edward's is beneficial. They joy of St Edward's is that it is so wild and natural. We do not need another ball field for organized activities. We need the open space for children to explore, families to picnic and adults to watch nature.

I am opposed to this project.

Hello, I am Unable to make it to the meeting tonight, And wanted to make this comment. Please do not renovate the ballfield and make it into Astroturf. It is a very important place where children explore nature, it will also impact the ecosystem in the area. There are very few places in this Seattle area that children can learn and explore nature, please let this place remain natural for the sake of the next generation.

We need to save as much land as possible to balance out the destruction from construction caused by humans. Save this entrance and habitat and protect it. I see so much wildlife disrupted in this area. Save your money and your water.

This is a poor use of our natural resources. Build this complex at Arrowhead on their astrodirf field.

As a degree holding landscape restoration professional holding certification as an arborist and a Horticulturist I find it disingenuous that this field is low impact. I grew up playing on these

fields, walking St. Edwards, playing baseball and soccer in this field. This will negatively impact the fragile and important local wetland ecosystems in this area. I like the idea of an upgraded complex, but this is the wrong spot.
Hi there, I am a resident of Kenmore, home to St. Edward's Park. I strongly discourage the addition of a turf baseball field in the field at St. Edward's Park. PLEASE leave St. Ed's, a beloved park in our neighborhood, natural and grassy. I love little league, but not at the expense of the Nature at St. Ed's! Thank you for your consideration
Please DO NOT add to or change the existing field at St. Edwards. Please leave it as it. No lights, no more extra seating, no artificial turf - just leave it. The 'Lodge at St. Edwards' is already putting added stress on the area. St Edwards is a very special and precious place - there really is nothing like this within King County that is near Lake Washington that is forested, making it a home to many insects and wildlife, that call it home. As a frequent visitor to the park, I love this area. I love seeing foxes, deer, coyotes, bumblebees, etc. It is their home and we must be good neighbors to them - for our human health and for future generation's health. Having an artificial turf field, that is well lit, all the time, is not habitable for wildlife. We humans already have so much. We DO NOT need this. I say NO. No to this extension.
It will forever ruin the delicate ecosystems that live there. Please help save the natural green space and habitat to so many creatures and us humans! It is State Park Land to be preserved not tuned into a sports complex. Kenmore can build something like this at one of the many local schools which would be a win-win for everyone. Inglemoor is just up the street.
Dear Parks Board Leadership and City of Kenmore, As residents of Bothell for the last 13 years we have been longtime patrons of St. Edward's State Park. Coming to the park for respite, rejuvenation and in particular for its beauty and pockets of wild beauty. As a clinical social worker, parent and community member, I know first hand the importance of spaces for our individual and communities' health that are not developed for us to explore, observe nature and feel our feet on the ground, even in soggy areas.

This particular field at St. Edward's is a magical area for adults and children alike with beauty all four seasons. It is a special area within the park and with precious habitat for animals, bugs, reptiles and humans alike.

Surely, there will more folks speaking up for consumer based use of the field. This is our short-sighted tendency as humans. This part of St. Edwards State Park deserves to be protected and preserved for its natural beauty, wet-lands and most importantly for the exploration that can be had around the edges.

After being patrons for many years, we were fortunate to bring our child to Camp Roots for forest preschool. It was such a gift to have this place so that our child could learn about the cycle of life of a tadpole to a frog and explore the wetlands.

With all the current restorations happening to the Seminary building, much is already changing at the park with the physical parking being extended and the expansion of the human footprint again. In a casting towards a longer vision, we are writing to whole-heartedly request you leave this field as is. It serves a profound and irreplaceable benefit to the wildlife, ecosystems and patrons of this special place.

There are plenty of other options for developing further to meet the sports community (which we are also in support of...) just does not need to be here. Once this system is destroyed, it will be gone for ever.

Please, please, please use your best sensibilities/common sense at this point in leadership decision making to leave the few places that have some ecosystem health/vibrancy alone. Again, there are plenty of schools and other places that would be great to invest in so that future ball players, cricket players and other sports field endeavors can have great places to play. While leaving spaces for individuals, children, families and forest schools to have a place to learn, be in awe and grow in curiosity in the natural world.

Thank you kindly for your consideration,

Please do not destroy the natural habitat of some of the animals at Saint Edwards Park. The part should be preserved so that children and adults alike can enjoy nature.

I am completely and totally against altering this area as proposed for converting and then renting the baseball fields. I am from Arizona recent to WA and the most beautiful place I have been to in all of Washington and the first place I take visiting people to is - St Edwards. It is so perfectly untouched and all the natural habitat protected and preserved. I am usually not a nature type person but even I know and appreciate this work of art created by Mother nature. It is Kirkland/Kenmore's hidden jewel surrounded by many other turfed and cemented parks and recreation centers. We don't need another one. It is already being taken over by the in works hotel. The planned parking lot has taken up much of the green areas. Step by step the natural

habitat will be " converted and rented out". I go to St Edwards multiple times a week and am always capitivated and grateful for its preservation and being granted to use the land. I believe it is a crime to touch this area as proposed and such plans will completely disrupt and destroy the natural ecosystem and balance within this park. I can't believe it is actually being proposed and wanted to voice my firm vote against this proposition and to urge those deciding to go lay in that grass within that perfect field and decide if that is the best decison for the animals and plants of St Edwards and all the people who get to visit it. Apologies any typos and misspellings - no spellcheck =)
As a Kenmore resident, I LOVE the idea of this ball field renovation at Saint Edwards and strongly support the plan! The area doesn't have nearly enough ball fields and they are sorely needed by children across the area. This is a perfect way to utilize and update the area.
Thank you for considering this ballfield space to be renovated. We really need more space for our kids to play sports in Kenmore. Our town seems to be lacking the space. The space already exists and makes logical sense to renovate what already exists. I think of St. Eds as the crown of Kenmore, and providing more opportunities for community gathering only adds to that aspect in my opinion.
I would like to speak in favor of upgrading the existing grass fields (no turf) and no artificial lighting. Artificial lights are harmful to wildlife and this is a state park. Turf, while cheaper to maintain, is unsanitary and will look very out of place in this beautiful natural habitat.
No ballfield improvements, protect our valuable greenspace!
Please keep the St Edward's ball fields natural. We have offered understanding and support to changing the building over to a hotel to be able to afford to preserve it but this support was given because we understood and trusted that much of St Edward's would stay relatively it's same natural environment. The ball fields offer so much opportunity for nature, wildlife, and exploring for kids and adults. It supports the calming environment when driving into the park to dive into a quieter natural experience. Bright lights and artificial turf will take so much away from the atmosphere and park experience not to mention the animals that depend on their natural habits more than ever with the development of so many areas around the park.
As a Kirkland resident on Finn Hill and a big baseball family, I'm very excited to here about this project. Our area lacks turf fields were kids can play baseball when it rains. Making the already present fields more usable is a fantastic idea! We hope this project goes through!
Hello, If it is feasible during your field improvement to add a rugby configuration, I would strongly encourage you to add this - lines and goals and appropriate space - so that rugby enthusiasts in the area will have another field to enjoy.

Rugby is one of the fastest growing sports in the United States, and has a tremendous amount of popularity with the Pacific islanders who are such an important part of our community.
Thank you for your consideration, and best of luck with all the improvements.
Please do not turn the ball fields at Saint Edwards State Park into artificial grass little league fields. My kids have been in the Forest Roots program there for the last two years and they absolutely LOVE that area for playing and observing all the great natural habitats that area has to offer. There are so many places to build little league fields such as that, where it won't impact a growing group of kids. Please decline and allow that space to flourish has a natural wetland area.
Deeply disappointed in this choice. Part of st Ed's charm is its rustic state park field. Ken,ore has lands for modern fields. Protect the natural land and its ecosystem
St. Edwards Park is a special place. It is quiet, surrounded by trees, and is an important spot to have as a way for people to connect with nature. It is already undergoing changes that will bring more visitors, and I would hate to see any additional "paving" of the natural property. Please continue to keep the fields and forest as they are for the future generations to enjoy and do not upgrade the field. Sincerely, a visitor who has appreciated this park for 40 years.
Hello, Please do not change the St Edwards fields to Astroturf! As a close by resident I am concerned for the loss if bio diversity in the the field. We need to maintain wild and healthy spaces where we can! As a parent, I am concerned for the possible health risks of Astro turf. Soccer goalies (who have close contact with the turf) have had higher incidences of cancer. Let's not wait to confirm that astro turf is the cause!
My family opposes this artificial turf ball field at St Edwards. It will damage the ecosystem in the area and would be much more appropriate placed at a local school. Please don't do this.
I strongly oppose any action that will put down plastic turf in our community. Plastic turf is proven to be damaging to the environment as well as human health. Children are more likely to sustain injury when playing on artificial turf and opposed to grass, and there are still suspicions that turf contains heavy metals and other toxins. Not ideal in a place intended for children to play! Currently the ball field is being used frequently by groups like camp roots, who prefer it in its current state. I understand that the community wants to make this space more useable for a greater number of people. However, we need to be careful of any project that would turn our precious green space into a place that is dangerous for both humans and wildlife. I'm left with many questions...

What is the plan to protect the wetlands? What will this plan do to work against global warming? Will the proposed lighting be further damaging to the natural habitat of the woods? I do not support this plan.
Please don't continue with the ballfield renovation. My kids as well as countless others love learning, playing and exploring the lovely grassy fields at St. Edward Park. We are losing greenspace all the time, please keep this a natural habitat for the kids as well as the insects that count on this tiny field as a home. Please!! NO TURF!
Sports fields are needed. Easy to say we can use this field or that, but has anyone looked at the open capacity at sportsfields? They all in use with cricket, soccer, lacrosse, baseball, football, softball etc. can't we move the frogs and salamanders? Were they there before the field was neglected? The drainage has gotten worse over the years which brings wildlife that wasn't there before.
We support the Kinder Roots, Camp Roots and other nature programs that utilize St. Edwards Park almost every day of the year and we would like to preserve the field for what it is. The program relies on this central area for their activities and the ecosystem of that natural space would be forever impacted, creating even less natural resources for local wildlife and those who enjoy nature. We would like to say that we do not support the ball field improvement as it would remove natural grasses and landscape for all of those (animal, insect or human) that love this park for its originally intended uses. Please keep it the way it is.
I am a parent of a 4 year old and for us, with lifestyle diseases like MS and allergies have been fading away mostly because of being with the nature as much as we can. We have quit a reputed Montessori School to be at Camp Roots coz exploring nature is as rare and precious as diamonds in this era. We urge with all our heart and soul to let the ball field improvement not affect our forest School. This natural home of various species . Please work elsewhere.
Development of a regulation ball field at St Edward State Park Part Two The City of Kenmore proposal to develop a ball field and my rebuttal why not to develop a regulation ball field has not changed. The City of Kenmore has presented similar proposals during Feb 2016 and Nov. 2017. Since the last proposal, several changes have occurred at St Edward State Park. 1. State Parks signed a 62 year lease with Daniels Real Estate. The Seminary building will open as an 82 room lodge in 2020. An underground parking garage will be developed.

2. The St Edward State Park EERC (Environmental Education and Research Center) is a partnership between WA State Parks and the UW/Bothell. The State Park provides diverse habitats that will serve a living classroom and labs, a place to experience and teach about ecosystems in our backyard. In May of this year it was announced that the 2019 WA legislative budget included \$75,000 for the renovation of the Seminary annex.
3. Several workshops and out door classrooms continue seasonally on the Sate Parks grounds. Tiny Trees Preschool is located in the outdoor woods, rain and shine.

Part of the State Parks Mission Statement is "State Parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives" The Sate Park should remain a Park which serves and welcomes the diversity of community and continues as many acres of rural woodland and undeveloped waterfront.

There are underutilized ball fields at Big Finn Hill and Bastyr U. The City of Kenmore can save money by sharing the facilities that already exist.

A. There is the flow of ground water, wetlands and nearby stream 226, especially in the in the winter. The Proposal includes leveling, some field expansion and removal/and replanting of vegetation.

B. There would be a chronic shortage of parking for teams and all other park activities. There would be an adverse effect on traffic flow on the roads that serves both the Sate Park activities and Bastyr U.

C. Outdoor education and youth sports are a great for a community. This proposal would be for team sports backed by Little League and part of the Kenmore City Council. It will serve only a small, select percentage of the community's youth. Though it may be considered a lucrative development by Parks Headquarters and City of Kenmore, it does not support the State Parks Mission of connecting with and serving a diverse community population.

The St. Edwards park is a wonderful asset for our area. I am concerned that we will be converting the natural landscape to artificial turf and remove some of the specialness of the natural area of grass and fields. I am all for driving usage of our parks but wonder if there are other areas in the park that we can use for ballparks. I am also concerned about the added lights and its impact on the wildlife that calls the park home.

Hello,

I am writing to comment on the proposed ball field renovations at Saint Edwards Park and the lasting effects that it will have on other end users of the public space for generations to come.

We participate in the Little Roots program which offers our child an opportunity to explore the surrounding ecosystem to which he learns about the mud, grasses, ice, cottonwood leave & buds, tadpoles/frogs & salamanders, nests, animal tracks & scat, adjacent wetlands and so much more in the very location where the City would like to introduce artificial turf and

lighting. It should be noted, that the field hosts portions of habitat that are not found anywhere else within Saint Edwards Park boundary. By providing opportunities that the Little Roots program offers, our next generation has the opportunity to forge a sound foundation with an understanding on the importance of nurturing and preserving the world we all have to live in; they are the future stewards of our planet and need every chance to get things right for their & the future generations that follow.

My family and I would like the City of Kenmore along with their urban planners to reconsider morphing the natural green space and habitat at Saint Edwards Park into a sports complex - hopefully there can be a happy medium which protects these types of public spaces & established programs while allowing for some re-purposing to ensure continued park usage & interest to as many residents as possible.

Thank you for your time,

I have grave concerns about the plan to put in artificial turf at St. Edward Park. This state park is a treasure to our community. It is the closest state park to our home. In an increasingly urban county, we need to protect our natural spaces. The crumb rubber and other materials come with numerous compounds and chemicals that have not been fully studied to assess their environmental and health impacts on our children, and natural environment. The state of California is currently conducting a comprehensive study to try to discern these facts and other studies have show that there is reason for concern. Please see three links below for cited studies. Let's not install something that could have negative impacts for generations to come. As a community we must find better ways to serve the needs of our sports community while keeping our fields safe for people, flora and fauna. We should put research into more sustainable ways to maintain fields and perhaps consider lowering our standards in terms of pristine lawns in order to meet everyone needs. We can't afford to take short cuts any more.

<https://oehha.ca.gov/risk-assessment/crn/oehha-synthetic-turf-scientific-advisory-panel-meeting>

<https://www.ncbi.nlm.nih.gov/pubmed/31134396>

<https://www.ncbi.nlm.nih.gov/pubmed/22921644>

Thank you for your attention to this matter.

Good Afternoon,

I would like to weigh in on the ballfield improvement plan. While I love the idea of making the field better for games/little league/ cricket etc., I am not in support of changing the field to turf and adding Stadium lights. Saint Edward is a refuge used by so many, hikers, bikers, picnics, playground meet ups and solitude. My family of 5 frequently meets up with friends to walk the trails, walk our dogs and play on the playground.

Changing the center of the park so drastically will potentially drive away many visitors who prize the land as a natural wonderland. I have heard that this will also detrimentally affect the program of Camp Roots. Additionally, the plan seems at odds with the restaurant/spa plan that is underway. Please consider scaling back the invasive nature of these ball fields and keep the improvements natural.

Thank you,

I am writing to express my opposition to a turf field in Saint Edwards Park for environmental and health reasons. To start with, my three children play soccer and I worry about them having to play on turf in North Creek and Big Finn Hill. The rubber/plastic beads get everywhere, especially in adjacent streams. I even got some out of my children's water bottles, I honestly would rather find dirt or blades of grass in there. There are health concerns about them, especially around carcinogens present in this tire material. As a family with a cancer history, I feel very strongly that we need to buck the trend and go back to grass for our children's sports. Of course, I understand the need for more sport fields in our Arrowhead area, and an environment friendly restoration of this field is what needs to be considered.

I sincerely hope you will take all the needs of the community in consideration and reconsider this project for the health of our children and the environment of Saint Edwards Park.

Dear Washington state parks and recreation,

My name is Sofia Arthur and I am a student who has attended frank love elementary school and Kenmore middle school and I have been to st Edwards park many times and have observed the nature and enjoy it. I and many people agree that adding baseball fields will disrupt the ecosystem and the habitats of many animals. Also, it will take a lot more resources to maintain. Therefore I do not agree with this plan.

I own and have live in one of the homes most near (as the crow flies) the new ball field area. Speaking to many near neighbors I haven't spoken to even one that is against this. Most of us have, or have had, children that have struggled to find adequate playing surfaces. This is very exciting and I hope you will consider turf.

I want to add my voice to support the renovations to the ball fields. As a player of organized sport in Puget Sound for more than 40 years-- and now as a mom of kids in sport-- I am very aware of the need for more field space. This location is ideal since it is already a sports field and just needs some renovation; it is not a new development. If it stays as grass--not field turf--there is a limit to the number of hours that it can be scheduled for active use, so I believe the traffic impact will not be as big as folks think. I hope that this project can happen! Thank you!

To Whom it May Concern:

As someone who is not a resident of Kenmore and a frequent user of Saint Edwards Park- I am incredibly frustrated by the dissonance of the proposed ball field project that benefits few with the broader use of this Park for ecological education and access to natural spaces. It is entirely

unclear why the City of Kenmore- which is its own municipality- needs to build turf fields inside of this State Park that serves as an ecological refuge for people and wildlife at the north end of Lake Washington.

If you look at an aerial map: you'll find habitat connectivity afforded to wildlife across this State (not City of Kenmore) Park, Big Finn Hill, and OO Denny. Intense amount of development is underway in this area, however, and private land is being developed and densified at an incredible rate. Saint Edwards State Park represents a hold out in the face of all this development. It is a refuge provided to all the local wildlife being displaced by the surrounding development. It's also a regional refuge to people seeking a break from densified urban centers. With the ongoing local growth and continued loss of our green spaces- it is an opportunity to preserve Saint Edwards State Park for all of us in the State and greater metropolitan area.

I've read through some of the documents provided by the City of Kenmore, and there are gaps in what I've read around the ecological impact of the proposed fields. For the purposes of the scoping effort- the analysis should include the following:

- A review of the available documents indicates that the wetlands impacted by this project are hydrologically connected to Lake Washington. Some documents indicate impacts to wetlands (degraded) that include earth work and fill. It is unclear why these wetlands are not considered jurisdictional under the Clean Water Act (Section 404). It's also unclear why this work would not trigger a JARPA or require State NPDES permit for creating a storm water discharge to waters of the state (if not federal) from the field and parking area as described in the project details. The project documents describe creating discharges into the adjacent wetlands from the fields and potential stormwater runoff from parking lot expansion.

- The concept of "non toxic" turf requires greater analysis and consideration. Non toxic is a subjective phrase as the toxicity of a substance is dependent on the dose and receptor. Extensive research is ongoing about the toxicity of synthetic turf that carries contaminants like organic toxics and heavy metals. From an article published by the National Institute of Health (<https://www.ncbi.nlm.nih.gov/pubmed/29268178>):

Due to the high concern generated in the last years about the safety of recycled tire rubber used for recreational sports surfaces, this study aims at evaluating the presence of forty organic compounds including polycyclic aromatic hydrocarbons (PAHs), phthalates, adipates, vulcanisation additives and antioxidants in recycled tire crumb of synthetic turf football fields. The analysis of rain water collected directly from the football field, showed the presence of a high number of the target compounds at concentrations reaching above 100 µg L-

While most research focuses on the impact to human health, there are also studies focusing on aquatic life as the turf serves as an ongoing source that carries chemicals via runoff to adjacent waters. For example: a study by the State of Connecticut found runoff from turf fields with concentrations of zinc in toxic amounts for aquatic life. As the adjacent wetlands have amphibians, wetland plants and wildlife uses: scoping out how loading heavy metals and organic contaminants into these wetlands should be included in the SEPA process. Because these wetlands are hydrologically connected to Lake Washington: the SEPA process should also include how loading from this site could impact water quality of Lake Washington. Especially if the discharge point for the stream connecting the wetlands to the Lake is adjacent to beach areas. It is possible that contaminants from the turf field could end up deposited on

sediments where beach play occurs. Young children may be particularly sensitive to contaminants associated with turf runoff.

- The parking lot improvements and materials associated with paint and caulk for the field should also include assessments as potential ongoing sources of PCBs to the wetlands and waters of the park. The State of Washington published a study in 2016 identifying consumer products high in PCBs, which includes paints use in roadways, caulking used in construction and yellow paint. This is particularly important as the study emphasizes the significance of the stormwater pathway for carrying PCBs into Puget Sound waters, and the project has the potential to create new sources of PCBs to be transported via the proposed stormwater system into the wetlands. From the State's Report

(<https://fortress.wa.gov/ecy/publications/documents/1604014.pdf>):

In the Puget Sound, surface runoff is the largest pathway to aquatic environments, followed by wastewater treatment plants, and air deposition. PCBs are released in the highest quantities in commercial areas compared to other land covers, making PCB contamination especially relevant to the highly urbanized Puget Sound Basin (Ecology, 2011). Surface runoff has also been shown to be a problem affecting waterways in the Spokane, Washington area. Analysis of such samples as motor oils, transmission fluids, traffic paints, and other similar inputs to stormwater were found to be contaminated with PCBs (Spokane, 2015).

- The SEPA process should identify what type of stormwater monitoring will be needed before, during and after construction to monitor for release of contaminants that have been found with the proposed activities (paints, traffic paints, transmission fluids, motor oils, and synthetic turf).

- The SEPA process should not only assess environmental impacts under current conditions, but also future conditions under climate change. Studies indicate that wetlands in particular are sensitive to the impacts of climate change, and the long term health of these wetlands and any proposed mitigation will be impacted by climate change impacts:

(<https://www.wetlands.org/wp-content/uploads/2015/11/Wetlands-and-Global-Climate-Change.pdf>)

- The scoping process should include alternatives for fields at other properties owned or operated by the City of Kenmore outside of the State Park. It is not clear why the City of Kenmore needs to utilize a State resource- the most heavily used State Park- to offer its citizens an opportunity to play in the park. As the State Park is a regional resource- not the City of Kenmore's actual land- Kenmore should be required to assess locations within its own lands for developing recreational fields in addition to this proposal.

- The SEPA process must consider the impact to the regional community who uses the resource. In addition to the City of Kenmore: regional uses of the State Park include multiple environmental education camps, schools and organizations. Their use- which is regular & ongoing throughout the year- is impacted as they use the fields and adjacent wetlands in the project area as teaching areas for their students. Construction activities will impact their classroom activities, as will the degradation of the wetlands and receiving waters. Documents online indicate that construction is proposed for the summer months, which is when all the camps are using the site. City of Kenmore documents state there will be limited impacts of these activities- which ignores extensive research on the impact of diesel exhaust and air quality impacts of heavy equipment on sensitive populations like small children. Children- whose lungs are still developing- have been well documented to have higher incidence of

asthma in proximity to roadways from emissions.. Children in the park would definitely be exposed to exhaust from heavy equipment and dust during construction activities and it's absurd to assert otherwise.

- The SEPA scoping process must also consider the ecological importance of the State Park as a natural space in addition to Kenmore's interest to utilize the park for its own interests. The federal grant provided to the State to purchase the lands recognized the goal of providing the greater Seattle area local access to a natural area. It is still an ongoing interest and use, as demonstrated by the many environmental education efforts underway: from Wilderness Camp, Camp Roots, the non profit Saint Edwards Environmental Learning Center and future home of Saint Edward State Park Environmental Education and Research Center (EERC). Supplanting wetlands used by these schools as a living labratory for (potentially contaminated) turf fields and more hardened surfaces for extra parking is an interesting juxtaposition to the original intent of the Park. The scoping analysis should include a review of the federal grant documents and consistency of this proposed project with the original intent of the State Park and any conditions specified in the grant.

In closing: there are numerous examples of what happens when we, as a society, view each project in a stove pipe: evaluate and permit one gas station here, one facility there, one hardened waterfront next to that. The result is death of a healthy ecosystem by 1000 paper cuts.

Please consider the City of Kenmore's proposal in that broader context of what is happening in the park (Bastyr & the renovations happening on site); the surrounding area (high amounts of development and densifying); the metropolitan area (great population growth at the cost of habitat loss and development) ; and the long term impact this has when we know future climate change conditions will further impact our area. Consider the impact to all users of the State park: not just the benefit to the City of Kenmore's sport playing population. This may not be a huge project in the scale of other local projects: but it is a significant development for a relatively undeveloped space. It also sets a precedent to continue to develop the State Park and ruin its character and ecology.

Thank you for the opportunity to provide these comments.

Good evening,

I am writing to let you know that I am very disappointed to hear that the field at Saint Edward's park might be renovated into a proper rec area.

As an instructor and director for youth nature connection programs at this park, I can confirm that we use this field every single program day since it provides to our students so many opportunities for playing and learning, opportunities that you cannot find in other parts of the park. Deer tracks live there for days; there are so many grasses and plants that call the field home; a big open space allows for huge group activities on the fresh green grass; there are countless other reasons why we love this space.

Please do not change this field; in particular, please do not add any concrete or take away any soil, or cover up any grasses with turf. There are already so few truly green spaces in this country, let us preserve the ones we still have.

I don't think they know, or care, about how this will impact the plants and animals in that surrounding area.

I always thought the state park, first and foremost, about preserving nature in our rapidly developing world and also bringing people to nature. Astroturf? Really?

I see the impact the fields would have on those specific spots -- spots where I know, because I've seen, countless animals live.

There's plenty of other places for this.

I want to add that I have spent LOTS of time after cricket matches picking up the cigarette bits and garbage they leave behind. It's shocking and a testimony that they have no intentions of being good stewards to, or contributing to what the park is really about. A loss of cricket players would be no loss at all, when it comes to preserving the ecosystem supporting the area.

I can't emphasize enough how shocked I am at this being considered... except I do. Kenmore stopped giving a care about the area years ago and turned Kenmore into a space I no longer know (born here in 1990).

We trust the state parks to take care of this space. This is up to you guys. Please listen as the people say that we really need you to protect this diverse and rich corner of the park. I've spent dozens and dozens of hours there (and more dozens), this development is only contributing to Kenmore's obsession with money.

I do not support replacing the natural grass located in the ballfields with artificial turf. May animals call St. Edward State park their home, and I believe this would negatively impact those animals. The ballfields should be left as is for the animals and for the many children who use this space as part of their learning at Camp Roots.

Please *do not* consider artificial turf for this field. There is no reason to replace natural grass with huge swaths of plastic. Our planet needs less plastic, not more! This is a state park, which is home to countless species of animals who use this field for habitat and hunting food... at *least* as important as human ball games. We should be more careful of protecting our natural habitats, for the animals themselves and for the children in the local forest school who learn about them there. If you want a more modern ball field, there is Inglemoor high school, just a 5-minute drive away.

I live in the Finn Hill neighborhood, very close to Saint Edwards Park. I love this improvement idea. Please do it :)

We would like access to the all the trails year round. The no bike policy assumes we as riders do not yield or pass hikers in an appropriate manor. The park is paid for by all of our taxes and thus should be available to all users. Some of the trails should be limited due to there size/width, but not the main loop that people travel from great distances to see/ride.

The May to Sept limit is very unreasonable, I'd like to here the justification, beyond a few hikers get upset we are on the trail.

Hello sir,

I'm a mother of a 3 yr old and we live in Sammamish. I have been following camp roots program since her birth but couldn't join her as its too far for me. BUT I absolutely adore the program and the kind of experience it provides young children. The program is diverse and not everyone is going to get it which also makes it unique. Not every country in this world can give these kinds of unique education to children (I'm not a US citizen) so only we can appreciate the quality it brings to the table from mainstream education. There are always alternatives to losing nature to do some things and as the most powerful country in the world, you can find alternatives. With all respect sir, please consider alternatives. Authorities have the power we common people can only raise our concerns. Thank you !!

You are drastically reducing the amount of people able to use this park for multi purposes. Kids play games, people play cricket, deer graze and more. Your project cuts the open ended usages. By putting in lights you are interfering with the nocturnal eco system even. This is a terrible idea. There are other places you can build the setup you are proposing. It's essentially not a park anymore if you put this in.

We live in Kenmore. I support the proposal as I am looking for good soccer and cricket classes near our house for my son who is 10 years old. My son loves to play soccer and cricket and badminton. We found good badminton classes for him but couldn't find good soccer and cricket classes near our house. Saint Edward park which is close to our house, it will be awesome if the proposal gets approved. I am looking forward to it.

I am saddened with the thought of putting anything artificial in the beautiful St Edwards park, let alone a huge turf ball field. I would think that we are all smart enough to come up with a solution that benefits the camps, nature and little league players. Let's not ruin this beautiful landscape and ecosystem by doing what is easy, and cheap. There are many examples of eco conscious architecture to pull ideas and inspiration from. Look at the Ford Motor company headquarters for example. Let this ball field be teaching opportunity of how humans and nature can co-exist.

Please keep our natural park natural. We love hiking at the park. Do it just about 5 days a week. Adding artificial turf and concrete will damage the seamless integration of the current fields and park. Artificial turf fields do not feel like a state park they feel more appropriate for a more central Kenmore location or closer to an middle school.

We also participate in summer programs, (5 of the 6 weeks) at Camp Roots. This change would alter their programs negatively. Please let's keep our park a wild and natural state park. Thank you!

I have a basic concern that adding ballparks to a state park is not in the spirit of Washington State Parks as I've experienced for the past 70 years. Parks are meant to protect and preserve habitat, not to create additional uses beyond what is found there in its original state. I realize there are certain exceptions, such as a lodge at a ski area. This is a necessity in order to enjoy the section of the mountain roped off for a sport. But, to recreate the contour of the land by filling in a wetlands buffer in order to create ballfields for a small community seems alien to the reasons for having state parks in the first place. I have thought and thought and can't recall any state park I've been to in Washington that has this type of activity going on - a small interest group only for use by the nearby community. A state park is a place where people from anywhere should be able to come and enjoy. I feel ballfields would be a reason I would not go there. It is not what I want to experience when I visit any public park. I have visited at least 44 of these parks, probably more but I don't remember all the names, through my lifetime, often far more than just visit - family cabin within one, Girl Scout overnights in another, family camping trips in many, family reunions at another for several years. During summers as I grew up, our family was either on the road in the PNW or taking a picnic to Hoods Canal - always to the state parks. I never, ever saw any structures other than a covered area for cooking and restrooms, fencing for parking areas, the rest was all left to be enjoyed in its natural state. I would like to see that THE CONCEPT OF USAGE IN GENERAL be addressed in the EIS, using documents containing "intention, usage, and limitations" of state parks in Washington state.

The WAC's give these rules for uses by public groups (not private groups). These WAC's are the very closest I can see to what is being proposed and none are in the same category whatsoever. In addition, use of public funds by all of us for the benefit of a small private group is not a determined use of our state parks.

WAC 352-32-165 Public assemblies, meetings. (1) Public assemblies are permitted in state park areas on grounds which are open to the public generally, provided a permit therefore has been issued as herein provided. and under this law, process to do this: (7) The permit application must be submitted along with a nonrefundable permit fee as published by state parks to the Washington State Parks and Recreation Commission, P.O. Box 42650, Olympia, Washington 98504-2650. The director, or designee, may issue a permit consistent with the application, or otherwise modified in a manner which is acceptable to the applicant. The following criteria will be evaluated

WAC 352-32-056 Peace and quiet.

WAC 352-32-047 Special recreation event permit.

WAC 352-32-045 Reservations for use of designated group facilities.

352-32-340

WAC 352-32-340 Approval of community-based park improvements—Policies. The director or designee shall approve or disapprove all permits for community-based park improvements. Specific policies concerning community-based park improvements are available upon request.

A community-based park improvement is a construction project, proposed to be accomplished by individuals, groups, churches, charities, organizations, agencies, clubs, or associations using donated labor and/or materials, that results in a permanent change to state park lands or structures, or that creates an additional structure on state park lands. A review by the

appropriate committee in the Washington State Legislature needs to be done and results of this are requested in the EIS.

Dear planning committee,

I am deeply concerned about the potential development plans for St. Edwards park. Specifically, I think it is a terrible idea to install lights because of the need to limit (not increase) light pollution which is known to negatively impact many invertebrates (many species of spiders hunt at night) and vertebrates (e.g. bats, owls). I also think it is a bad idea to install artificial turf because it will negatively impact animals (insects, squirrels, raccoons, field mice, deer, hawks, snakes, etc) that utilize the grass field for food and/or shelter. Further, a turf field will negatively alter the natural runoff of rainwater from the surrounding woodlands, increase erosion in adjacent areas, and through rain and foot traffic, rubber particles will be dispersed throughout St. Edwards park to the detriment of the ecosystem.

My family frequents this wonderful park monthly and I understand the need for places where people can come together to play. However, it is my opinion that the negative impact of these development plans far outweigh their benefits.

Thank you for this opportunity to share my concerns,

Our three children, ages 12, 10, and 7, attended a Camp Roots outdoor program in Saint Edwards State Park last year. They enjoyed it so much, they are enrolled for the 2019-2020 school year as well. More importantly than their sheer enjoyment, however, my husband and I considered their time in the program, completely outdoors, as hugely beneficial to their education. Those benefits could never be replicated in an indoor, traditional educational setting. Our daughters return home at the end of their days in the park full of stories about the natural surroundings, including the creatures they observed and the plants they identified. By changing the current field where so much of this learning takes place, Kenmore will be irrevocably altering the dynamics of the park as well as our children's experiences. I was heartbroken when I learned of the plans to convert this space into ball fields. I have not even mentioned this issue to my daughters as I know they would be devastated, and my hope is that these plans are reconsidered and altered before I must share such sad news with them. Please, please, please take my family's experience into account because, if you haven't already, I believe you will hear many, many similar stories of how much this unadulterated space means to outdoor educators, students, and their families.

Re: PROPOSED St. Edward Ballfield Improvement

This wetland area is already providing a benefit to the beautiful shoreline habitat of Lake Washington. It's a fresh water sanctuary that should be enhanced and loved! If this property is further developed into a play field as you propose, it will only add to the stormwater runoff problem by making the ground even more impermeable. And you can't just keep sending the water "away." There are many many many other areas in King County that could be enhanced to provide a community gathering place and sports field - just take a citizen survey and you will find them!! Please set the standard of being a good steward of our precious wetlands and

wildlife habitats by allowing volunteer groups to design and maintain a beautiful shoreline habitat for all to enjoy forever.

Remember the Beacon Food Forest??? <https://beaconfoodforest.org/how-we-started/> AND The Edmonds Marsh <http://www.edmondswa.gov/2011-10-03-01-10-24.html>

Both hugely successful!
Let them be a model for you.

Please leave the park as it is today without impact to Kenmore residents. We need this magical green space in our lives without hindrance or disruption. Many thanks.

Hello Jessica,
Just looked at the drawing on the city of Kenmore website for this.
Below are my comments.
1. You will receive tremendous push back from a very loud, very small group of people from "Friends of St Ed". Understand that and treat accordingly.
2. Additional parking appears to be completely inadequate.
3. With the Lodge at St Ed opening in Spring 2020, it would seem prudent to wait on this entire proposal so as to access the new situation/new normal for this area next to the Lodge.
4. Both the lighting and covered bleachers sound elaborate and expensive.
5. Lighting is intrusive and extends the hours of heavy use and heavy traffic for the park.
Suggest it is part of a second phase, if at all.

Dear Ms. Logan,
I am writing to you to respectfully request that the city of Kenmore not be allowed to build Little League and soccer fields on the SESP grounds, and I suggest that they be directed toward enhancing the grounds of Kenmore Elementary School instead.
My reasons are as follows:
1. Traffic. The amount of traffic and parking required for Little League and soccer games will render a state park unusable for those persons looking for open space. There will never be enough parking for the games, let alone games and nature seekers.
2. Trash. It's hard enough to keep our state parks clean without inviting enormous amounts of waste that accumulates at these kinds of activities.
3. Noise pollution. Not only do humans still need somewhere to be outside without the sounds of screaming parents

coaching their kids, but so do the animals who live within the park boundaries.

4. Wetlands. Once these wetland areas are destroyed, there is no bringing them back, nor any amount of so called mitigation that makes right destroying what has been set aside already.

5. Improve an existing site. The Kenmore ES has a black top track space that would be well suited for this space and use. The removal of black top makes for better water drainage and return of water to ground water instead of storm drain run off. The school parking lot is already adequate. Students could also benefit from better designed outdoor space.

I appreciate the opportunity to share my strong concerns with you, and implore you to do what is right for our community now as well as in the future.

Dear Jessica,

I (and many of my neighbors) are a bit unclear on what comments are being solicited right now. I am looking at a form that says "...share your thoughts on the proposed renovation..." On the link to the EIS Process it says to comment on the alternatives, impacts and mitigation measures to be analyzed. Do you want to know what we think of the proposal, or just what we want the EIS to study? Or both?

Thank you for clarifying this for those of us who could not attend the meeting last week.

From: Logan, Jessica (PARKS)
 Subject: RE: St Edwards Ballpark
 Date: Tuesday, August 20, 2019 9:25:07 AM

Good Morning,

I am sorry to hear you were unable to attend our scoping meeting! Thank you for your question, I will do my best to clarify what comments we are soliciting. The State Environmental Policy Act (SEPA) requires us to look at the potential adverse environmental impacts of a proposal before we make a decision on whether or not to approve it.

"Public scoping" is a formal part of the EIS process; the purpose of scoping is to narrow the focus of the EIS analysis to just those elements of the proposal that have probable significant environmental impacts. The law lists about sixteen "elements" of the natural and built environment that could be impacted by a proposal, this includes everything from water and air quality, to plants and animals, to recreation, traffic and public safety. What scoping

does is help us narrow which of these areas we need to focus our analysis on. So if the proposal is not anticipated to have impacts to public safety, we will not spend time analyzing public safety impacts when that time would be better spend looking at impacts to recreation, or an element that is anticipated to be impacted. It's about making the document focused and relevant so that it can best inform decision making. SEPA requires that we do this scoping as part of a public process. This does two things: 1) it gives members of the public who may be unaware of the project and opportunity to learn about it, 2) it gives the public (many of whom are far more familiar with the park than those of us facilitating the review), an opportunity to comment on impacts, alternatives, or mitigation measures that we may not have thought of. So, if you have particular concerns about impacts this proposal may have, we would like to know what those concerns are and what you think may be impacted. Additionally, if you have thought of a better alternative than what has been proposed, we would like to hear that too. The information you provide will be considered as we move into the drafting phase of this EIS. Once the EIS has been drafted there will be an opportunity for the public to review it and provide more feedback during an additional comment period. We will hold another public meeting to share with the public what we have learned that will include time for public testimony and comments. The comments we solicit for the Draft EIS will be specific to the content of the analysis. I hope this helps to clarify what it is we are asking for. If you have any other questions please don't hesitate to write me again or call. My phone number is provided below.

Thank you,
 Jessica
 Jessica Logan
 Washington State Parks & Recreation Commission
 PO Box 42650 | 1111 Israel Road SW | Olympia, WA 98504
 (360) 902-8679 HQ
 Please consider the environment before printing this e-mail.

Good morning, Jessica.
 My heart is sinking at the prospect that the ballfield may become a sports complex. What a complete shame to so drastically alter the nature of that beautiful park. That being said, I have questions regarding "next steps".
 1. Who is (are) the final decision maker(s)?
 If it is the commission, from whom do they receive their "official" information?
 Do they generally follow the advice/recommendation of staff?

2. At the January (2016?) meeting at Bastyr (regarding the hotel), I was horrified that at the very last minute public comments were cut from three minutes to one minute.
How much time will each speaker have at the August 13th scoping meeting in Kenmore?
3. Written comments are due to you by August 30th.
Who reads those comments?
Do they REALLY get read?
4. Do the "decision-makers" weight written or oral comments more heavily?
5. Who has been notified of the public scoping meeting and public comment period?
It seems to me that the stakeholders are not just Kenmore residents.
How are other Washington citizens being informed about this project?
Please refer me to the person to whom I should be asking these questions (if it's not you)!
Thanks so much and I look forward to seeing you on the 13th

Sent: Tuesday, August 6, 2019 9:10 AM

To: Jessica.Logan@parks.wa.gov

Subject: FW: St. Edward Ballfield Development

One more thing, Jessica...

There is NO SIGNAGE at St. Edward State Park to alert the "general population" (including non-

Kenmore residents) of the upcoming

August 13th scoping meeting or the August 30th due date for comments.

To whom should I address this concern? (Ask you, too, Becki...please see original email, below...)

To: Logan, Jessica (PARKS)

Subject: Reply requested today, please.

Date: Monday, August 12, 2019 6:24:42 AM

Hello, Jessica.

Your name is listed as the contact person, but I haven't received a reply to any of my questions yet.

Kenmore refers me to you...

Since I'm preparing remarks for tomorrow's meeting, I'd appreciate a reply today, please, to these

two questions:

1. How many minutes will each speaker have?

2. Who has been notified of the public scoping meeting and public comment period and how?

Specifically, I'm wondering if there has been any notification OTHER THAN the poster on the

kiosk at the park, your website, and the Kenmore website.

From: Logan, Jessica (PARKS) <Jessica.Logan@PARKS.WA.GOV>

Sent: Monday, August 12, 2019 9:54 AM

Subject: RE: St. Edward Ballfield Development

Good morning,

I apologize for not responding to your email sooner than this but I have been mostly out of the office and I wanted to provide you with a proper response. I have addressed all your questions below in **green**. If I missed anything or if you have any other questions please don't hesitate to call me. Thank you!

Jessica

Jessica Logan

Washington State Parks & Recreation Commission
PO Box 42650 | 1111 Israel Road SW | Olympia, WA 98504
(360) 902-8679 HQ

☐ Please consider the environment before printing this e-mail.

To: Logan, Jessica (PARKS) <Jessica.Logan@PARKS.WA.GOV>

Subject: St. Edward Ballfield Development

Good morning, Jessica.

My heart is sinking at the prospect that the ballfield may become a sports complex. What a complete shame to so drastically alter the nature of that beautiful park.

That being said, I have questions regarding "next steps".

1. Who is (are) the final decision maker(s)? The final "decision maker" depends on the decision.

The decision to give the City of Kenmore a lease to renovate and manage the ballfields would be made by the WSPRC Commission.

If it is the commission, from whom do they receive their "official" information? I'm a little uncertain what you mean by "official"; for this review process State Parks is the SEPA lead agency.

As our agency's SEPA Responsible Official, I will be facilitating the review, ensuring the analysis is adequate, and then providing the Commission with information so that they can use it to make an informed decision.

Do they generally follow the advice/recommendation of staff? Our Commission rely on the expertise of their Park staff during their considerations.

2. At the January (2016?) meeting at Bastyr (regarding the hotel), I was horrified that at the very

last minute public comments were cut from three minutes to one minute.

How much time will each speaker have at the August 13th scoping meeting in Kenmore?

Good question and an important clarification: the scoping meeting on August 13th is an open house format, there will be **no** public testimony. The purpose is specifically to narrow the scope of review

to ensure that we are focusing on just those elements of the environment that will might be impacted from this proposal and to hear from the public about alternatives and mitigation that we

haven't yet considered. All comments/questions will be captured in writing. We will have staff on

hand to help capture comments from members of the public who cannot or would prefer not to write them themselves. Future meetings will provide opportunity for public testimony. We will go

over this more at the meeting.

3. Written comments are due to you by August 30th. Yes

Who reads those comments? The comments will be compiled into a comment matrix and will be available to the public.

Do they REALLY get read? Yes. The information gained from comments is essential to narrow the scope of the analysis and to ensure that draft document is focused, thorough, and relevant.

4. Do the “decision-makers” weight written or oral comments more heavily? All comments are considered.

5. Who has been notified of the public scoping meeting and public comment period? The mailing list for this proposal includes all adjacent land owners within 1000 feet of the park as well as any interested stakeholder who has requested to be included.

It seems to me that the stakeholders are not just Kenmore residents.

How are other Washington citizens being informed about this project? Our Parks communication team has sent out a statewide news release. This proposal and all of the relevant information about it is located on our website.

Please refer me to the person to whom I should be asking these questions (if it's not you)!

Nope it's me . Feel free to shoot me a phone call if you would like with any additional information. Otherwise I will continue to answer as quickly as I can.

Thanks so much and I look forward to seeing you on the 13th.

To: Logan, Jessica (PARKS)

Subject: RE: St. Edward Ballfield Development

Date: Monday, August 12, 2019 4:07:24 PM

No apology necessary, Jessica. Thanks for the thorough reply.

I had planned to spend today and tomorrow preparing three minutes of comments, so I was grateful

to get you message this morning that no comments will be taken.

I'm forwarding this info to others. Everyone I know who is planning to attend the meeting tomorrow

was assuming there would be a time for public comments.

Looking forward to seeing you tomorrow.

From: Logan, Jessica (PARKS)

Subject: RE: St. Edward Ballfield Development

Date: Tuesday, August 13, 2019 8:22:24 AM

Good morning,

Thank you so much! Yes please spread the word. There will opportunities moving forward for public testimony, which we will discuss tonight, but for the purposes of this meeting we really are just trying to understand the scope of what this analysis needs to be.

I look forward to talking more this afternoon.

Cheers,

Jessica

To: Logan, Jessica (PARKS)

Subject: SAINT EDWARD PLANNING – BALLFIELD IMPROVEMENTS

Date: Tuesday, August 13, 2019 9:43:40 PM

Hello Jessica

As a Kenmore local resident and a parent with a child at Canp Roots who uses this area all year, I would not support the new ball field improvements. I feel we need to protect the existing ecosystems that are already in place for generations to come.

Thank you for listening

To: Logan, Jessica (PARKS)

Subject: SAINT EDWARD PLANNING – BALLFIELD IMPROVEMENTS

Date: Sunday, August 4, 2019 6:34:11 PM

Dear Ms. Logan,

I am writing to ask that you choose No Action—how the field is used now (no lighting, existing grass).

If this is not possible, please choose Improved Natural Turf Field with No Field Lighting.

Here's why:

· **Traffic and noise concerns:** I have lived near St Edward's Park for over 13 years and love the

park very much. I am very concerned about the ballfield improvements because of the increased traffic it will bring. With the new hotel coming, we are already going to see a very large increase in traffic flow on the narrow two lane road that leads from Juanita Drive. I feel that it is unwise to add to that traffic, especially before we know the real impact of the hotel. The traffic light already gets backed up even with small events and with the bike and pedestrian traffic along the road, it's going to increase the danger of accidents and increase noise and emissions with idling cars (cars that will be idling directly adjacent to the trails we are trying to enjoy). Having more ballfields with loud crowds will greatly add to the noise in the area. Beyond the noise of traffic, the crowds will be a huge impact for those who are trying to enjoy the peace and quiet of the trails.

· **Light pollution:** I am also very concerned about the lighting that is being considered. St. Edwards has been a quiet, serene park for nature lovers and wildlife. Adding traffic, plus lights will change the character of the park and negatively impact wildlife. Big Finn Hill Park is

very close by and provides lots of ballfields for local families. The park has a much more different feel because of the noise, lighting and traffic. Please don't take away the quiet that humans and wildlife currently enjoy at St. Edward's, impacting us even more than the hotel already will!

· **Artificial turf:** Lastly, the idea of adding artificial turf also takes away from the natural character of St. Edward's. If you have visited this beautiful park you realize what an amazing gift it is to have this natural area. Artificial turf will be an eyesore.

We are going to see so many changes with the addition of this hotel. Please consider that increasing

traffic, lighting, and artificial surfaces through these ballfield improvements will negatively impact

the park for those of us who have enjoyed it for so many years. Most of the parks in our area cater

to the ballfield crowd. Please keep St. Edward's as natural as possible by choosing No Action, or at minimum, Improved Natural Field Turf with No Field Lighting. Thanks so much for your consideration.

Dear Ms. Logan,
Regarding the ball park at Saint Edwards, I am asking that no action be taken. Please leave the field how it is used now: no lighting, existing grass. Thank you.

Hi Jessica:
I will be attending the Scoping Work Shop tomorrow at Kenmore City Hall. However, I will be coming about 7:00 P.M. as I must attend the Bothell City Council meeting at 6:00 P.M. At the Workshop will there be a one-to one person opportunity to state my comments on the scope of the EIS at @ 7:00 P.M. or is there another format?

To: Logan, Jessica (PARKS)

Cc: Elizabeth Mooney

Subject: St Edward Park comment for Aug 13 2019 City of Kenmore meeting

Date: Sunday, August 4, 2019 4:00:18 PM

Dear Park Commissioners,

Please - re St Edward Park grassy dark wetland stream WRIA 08.0226 headwaters field - leave it as is...and promote environmental protection and education with nocturnal animal and salmonid - maybe even Kokanee - restoration and education. Please do not allow any artificial lighted expanded ball field at St Edward State Park. Please say no -once and for all- to City of Kenmore's idea to build upon , cause significant adverse environmental impact upon, the grassy field. The grassy field is alongside a wetland that is a headwaters to a stream WRIA 08.0026 which is part of Lake Washington and should be protected and restored. We need good stewards of this park's natural systems and we need to foster a do no harm attitude within the park.

Sadly, in my opinion, my city has wasted our money on an idea that does not fit well at the park. They could put their idea elsewhere in an already impacted area. We need to promote environmental health.

Please let nonprofits like Audubon build educational programs and bird blinds, but keep the grassy field dark and quiet for peace and tranquility in this urban setting. If you want my help, I would be proud to ask the nonprofit People for an Environmentally Responsible Kenmore, which I helped form (perkinkenmore.org), work hard with you -and others -to make an environmentally responsible program at that site. I understand there is an educational program that is planning to be a part of the park and it would be great to work with people like that, in the grassy field, in the future.

Thank you.

Please do not make any changes to St Edwards Park. Please no artificial turf. Leave the field as it is. Thank you

To: Logan, Jessica (PARKS)

Subject: St Edwards ballfield renovation

Date: Monday, August 26, 2019 9:32:30 PM

Dear Ms. Logan,

I write to respectfully and strongly oppose the City of Kenmore's proposal to lease and renovate the existing ballfield at St. Edward State Park.

Additionally, I do not support the proposed alternatives. Any development proposed will adversely impact the St.

Edward wetland and meadow area. The meadow, currently a habitat for deer, birds, insects, and other animals, and

actively used as a hands-on outdoor classroom by children and adults year round, would disappear. The

development would also damage the adjacent Category II wetland, the ripple effects of which would be felt

throughout surrounding habitats as well.

It has already been documented in reports prepared for the proposal that animals and insects would be adversely

impacted. I am concerned about those impacts. I have additional concerns about water quality and plant-life impacts.

Wetlands are a critical component of healthy watersheds; the stream that runs from the wetland into Lake

Washington is part of the watershed that supplies drinking water to millions of families in this region. Please do let

let development encroach upon and damage it.

I would like the State of Washington to commit to preserving and protecting the wetland habitat and meadow at St.

Edward State Park for passive recreation and environmental education. Restoration of the wetland (e.g., returning

some of the meadow to the wetland through putting a stop to mowing in the wetland buffer and planting native

wetland plants) will improve the health of our watershed and the habitat for insects, birds, and animals that need

sanctuary from the urban areas surrounding St. Edward State Park. I encourage the State of Washington to be

visionary in their approach to managing the land that is in our collective care; St. Edward State Park is a precious

natural resource that is a vital part of our state's health and prosperity. If we are courageous enough to value it for its

natural aspects and commit to preservation, restoration, and education, St. Edward State Park can continue to be a

wonderful asset for all residents of Washington State for generations to come.

Thank you for fielding these comments and for taking the health and conservation of our state's natural resources

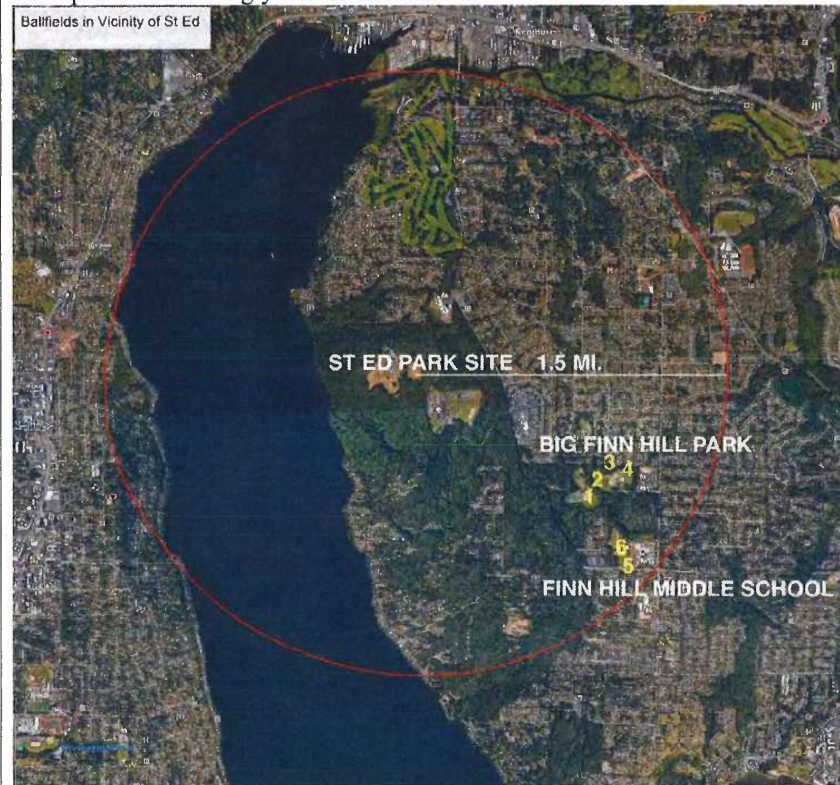
seriously.

Please, please don't let this project go forward.

I'm am saddened to see our precious little green areas slipping away. I purchased my home in arrowhead because of the joy of St Edwards park AS IT I S, first the hotel now the thought of converting the field, Please do not do this Be well
I've got a question, Jessica. I was concerned about parking and the numerous play fields being in operation at the same time. I was unable to identify on the civil drawings where the looped 60+ parking spaces were located. Should I assume beyond the northwest end of the fields? I guess one comment I would have would be about overflow parking and whether an agreement could be worked out with Bastyr for that eventuality. Dual use of parking lots (and I'm discounting the Lodge parking...it shouldn't have to accommodate vehicles other than those for its visitors) makes a lot of sense, particularly when the uses don't overlap.
Hi again Jessica: RE: Workshop tomorrow, Kenmore. Please have at the Work Shop the Map with the Saint Edward State Park Land Classification and Long-Term Boundary with a LEGEND. Page 14 of the CAMP has the map but no legend. This is important so that individuals can reference the Policies for the Land Classification areas in reference to the BallFields proposal.
Hello, I am the mother of 2 children who frequent St. Edwards Park. I heard of the possibility that our loved natural ball field could turn into a little league field. Please reconsider! This is a wonderful habitat we explore as a homeschool family. My children have studied countless creatures from the wetland that edges the field. They run skin to earth on the field, play games with their friends. It would be awful to see it turned into turf. We love the grass and mud. We attend Camp Roots, an outdoor school program and the natural state of the field is not only vital to that ecosystem, but to the childrens connection to nature as well. That area provides things that the rest of the park does not. Please leave it be.
Hello Jessica. In reviewing the St. Edward ballfields SEPA scoping material I have the following questions: 1. Are the posters that were on display at the August 13, 2019, scoping meeting available as pdf documents? May I please receive copies? 2. WAC 352-11-665 (1)(b) refers to "unquantified environmental amenities and values" to be considered "along with economic and technical considerations." Could you please clarify the meaning of "unquantified" and how it may apply in the context of making scoping comments about the St. Edward project? Dear Ms. Logan,

The following should be considered in environmental impact analysis of the referenced project:

The Draft EIS should carefully inventory and evaluate the existing supply of ballfield facilities in the vicinity of the proposal. As the attached Google Earth - derived image illustrates there are presently 6 improved grass ballfields within merely a 1 1/2 mile radius of the proposed site. This image does not include more than 18 additional Ballfields in Kenmore, Bothell, Woodinville and Kirkland lying within a 5 mile radius of the Park. What is the justification for the new ballfields in view of the more than adequate existing supply? Furthermore, if the proposed fields are justified merely by some hardware rationale, i.e. lights, surface, restroom, etc. not actual, numerical need for more playing field space, could not an existing facility(ies) be improved accordingly and at less cost?



Please make sure that the fields are multi-use, especially for rugby, the fastest growing sport in America.

INSERT EMAIL W/PICS WHEN PDF

We have a critical shortage of rugby fields for youth in the community. Youth rugby is growing by leaps and bounds. Rugby has provided a wonderful sporting but also cultural experience for thousands of kids over the years. There are several youth rugby teams,

including two on the East Side. There are also men's and women's clubs that require pitches. A rugby pitch is roughly the size of a soccer field. In rugby there should be a maximum of 100 metres (109 yd) between the two try-lines, with anywhere between 10 and 22 metres behind each try line to serve as the in-goal area, and 68- 70 meters wide. Rugby posts are on the goal line, On each one is a goal post that is 5.5m wide and at least 16m high, with a crossbar set 3m above the ground. For what it is worth, I'm pretty sure that local rugby clubs would be willing to cover the cost of purchasing and installing the goal posts.

I love going to St. Edwards and walking among the trees. I love in Edmonds! Please leave it a State Park.

City of Kenmore wants to spend 1/2 its annual budget \$5,000,000. on two artificial turf baseball fields at Saint Edward State Park. Doing what to our taxes to squeeze in the cost everything else?

City of Kenmore track record: (My side rant) Because the Lake Pointe pipe dream failed yet again (at what public cost?) they must spend more money on Lake Point Land that our City does not even own? Logic please....the developer is so long and gone. The City of Kenmore is now spending an additional \$60,000. on a consultant for a possible City Park at Lake Pointe. So please. How much of our money was spent and staff time billed during the failed Lake Pointe development plans?

Place a factual number here:

Now Saint Edward State Park:

"The field" It is open grassland and open use now on the left side of the entrance road as you approach the old Seminary Building.

The City of Kenmore proposes to develop a sports field complex on a 3.5 acre meadow that is adjacent to a Category II wetland in St. Edward State Park (the city would enter into a long-lease with the state). The St. Edward wetland is the origin of a fish supporting stream that ends in Lake Washington. Category II wetlands are difficult to replace and provide high levels of some wetland functions.

The wetland and surrounding habitats, including the meadow that the City of Kenmore wants to develop, are home to a variety of native plants, insects, and animals. The sports field complex would build into 90% of the currently required wetland buffer, bringing it within 10 feet of the wetland. The State of Washington (the lead agency on the project) has already determined that the proposal is likely to have a significant adverse impact on the environment, which has triggered an Environmental Impact Statement (EIS) report.

St. Edward State Park - The City of Kenmore's plan would have adverse environmental impact on a currently natural space. Better to improve the North Shore School District Ball Fields *that are in poor condition and in play for ball field use. In any change anywhere no Artificial Turf please.

Passive Open Space is the "highest and best use" this State Park was intended as a getaway from human madness. Grazing land is eaten by herbivores rabbits, deer, chipmunks, squirrels. Winter time is the time when fodder is in short supply. Mother Nature first.

Conclusion and verdict: Please Washington State Park board rule a resounding NO on the proposed change of use.
- I am concerned about the potential impact on migrating birds and other wildlife at St. Edwards Park - I am concerned about the bright floodlights ruining the woodsy nature experience at St. Edwards Park - I am concerned about the wetlands buffer proposed as it may negatively affect the wetlands environment at St. Edwards Park - I am concerned about increased traffic in the area around St. Edwards Park and lack of sufficient motorways to access - I am concerned about shortage of parking areas at St. Edwards Park for those who want to enjoy the woodsy nature area there as opposed to ball games
I understand you are seeking comments concerning proposed changes to St. Edwards Park. I would like to share my feelings about this gem. St. Edwards State Park is a true gem for the citizens of the state of Washington. It provides peace and respite for those of us who are surrounded by city noise, traffic, and lights. It is so important with our dramatic increase in population to have a place in nature where the spirit can be renewed. Please do not approve the unnecessary, and environmentally suspect changes proposed by the city of Kenmore to the ball field in this state park. Again, it is a state park, not a city park. It is a state park, not a sports complex. I appreciate the opportunity to give input into this decision.
Dear Jessica, Please add my voice to those who wish to maintain St. Edward's State Park for the use and enjoyment of our citizens. Thank you
Jessica and Joe, Thank you for the opportunity to comment. Rather than simply count the attached as one vote for No Action on playfield development, I believe it would be to the State's benefit to review the letter in its entirety. Again, I think it is bad policy not to give the public comment letters on this important issue to the State Park Commissioners. Dear Jessica, Thank you for the opportunity to comment. I will fit my comments into Number 5 of the Matrix, No Action. I am terribly disappointed that our public comments will not be presented in their entirety to the Commissioners themselves. For instance, I think the Roots comments with photographs are good documentation of what can be gainful to the broader public good with a No Action. Four reasons why option five in the matrix, No Action, is the only ethical and legal policy option: #1 WRIA 8 calls for restoration of streams especially salmon spawning streams at the shores of Lake Washington. Destroying the headlands of Stream #0226, the only stream that starts in Saint Edward Park -- at the SE corner of the playfield -- and completes its course to Lake Washington where salmon spawn at the outlet -- and would spawn further

up-stream if the outlet were minimally restored -- is particularly, specifically, under the protection and responsibility of the State Parks Commission. WRIA 8 is a good resource, guidance, on how to treat this special Lake Washington stream.

#2 In 2007 State Park Commissioners and Staff extensively studied the wetland's scope based on science and including a King County map of Stream #0226. Park Commissioners' decision was of No Action on 4-26-07, audio available. This was a unanimous opinion, each Commissioner re-iterating how he/she came to that decision. Joan Thomas was the chair, an expert with community renown in wetland preservation. Comments by the Commissioners over time included and emphasized that the City of Kenmore should not bring further playfield development proposals to the Commission because this is a regional park.

The Commissioners' decision included the importance of saving the majestic trees proposed for removal by the action plan of the City of Kenmore, including a conifer and the iconic black cottonwoods. The trees' crucial function of collecting water during rainy times and aspirating cooling moisture during hot weather when wetland plants are most vulnerable was noted in the public's presentation -- as was the correction to the City of Kenmore's erroneous claim that conifers would not be removed. Sate Parks' seasoned environmental expert concurred with the public testimony. The City of Kenmore was uninformed then, and now? When this mess is again sorted, I believe Stream #0226 should be named after Joan Thomas. Friends of Saint Edward State Park voted to support that naming. While the City of Kenmore's new plan may not specifically call for the removal of trees, they may have to be removed regardless if the playfield is developed -- if the aspiration cycle is interrupted and play is brought close to the cottonwoods, the cottonwood branches would then pose a danger to children.

The environment is now to the park visitors' benefit. Development proposals for ball fields can only detract from the natural function of the wetland and add to global warming to the detriment of wetland plants and wildlife -- fish spawning at the outlet, bats nesting adjacent to playfield, deer drinking from stream, wetland plants cleansing the water and cooling favorite spots to picnic. All add to visitors' enjoyment, the visitors there to experience a regional park.

#3 In the Secretary of the Interior rules regarding "development," the development of ball fields, is not allowed on lands obtained with Land and Water Conservation Grants for passive use without just compensation to the public of like land. Money is not considered just compensation as the City of Kenmore would have you believe. Ball fields are an active sport; the fields can be maintained but not improved or developed according to the rules of the LWCA without land of equal value being provided by the developer. This is true even if the properties are historic. An argument by the City is that the playfield can be improved and developed because it is historic. This is erroneous. Please see the rules handbook, Volume V-39 8-25-77--10-31-77:

First, Page 109 states that development is okay for lands acquired by Fund assistance IF IN ACCORD WITH THE PURPOSES according to the Project Agreement. The purpose in the Project Agreement was for a passive park, and by definition within the Land and Water Conservation Act, organized sports like baseball, football, soccer, cricket are not considered passive recreation.

Second, Page 77 states that historic sites management activities are limited to preservation and maintenance.

2014 Memorandum gives more leniency to concessionaires, but it does not go far enough to include a plan for a new population of visitors not there for a park experience. Development of the playfield will bring in a population for tournament play, not there to experience the park, and detract from most park patrons' experience. To-date, the local teams can rent the playfield for their ongoing sports, only Cricket has chosen to do so and enjoys low key play that does not interfere with visitors' park experience or the playfield's integrity. The Cricket play is well away from the wetland, without lights, and not needing the grading the City of Kenmore proposes that would harm the headwaters of Stream #0226. Further, Cricket regulations require play on grass. It seems the City of Kenmore did not actually consult the cricket players. (Should State Parks be unable to find documents mentioned in #3, I can forward or provide links for you to download; these were not easily forthcoming from the National Park Service or the State, indeed, took months to obtain.)

A question of Degree: The legal universe of the National Park Service was questioned regarding its decision that the Kevin Daniels' lease is legal. NPS has divested itself of responsibility for that determination. As late as August 12, 2019, the National Park Service interpreted the lease and laid the liability for Daniels not following the lease on State Parks: The State is ultimately responsible for compliance and enforcement of the LWCF requirements in post-completion if public use is restricted, the State needs to process a conversion of use . . . See Section 2.1, 2.4 of the lease. Failure to comply with either section 2.1 or 2.4 would seem to be an Event of Default subject to the remedies described in section 11.4.

Daniels has already restricted public use. Daniels added restrictions on public use, after the fact, after the lease was signed, in conflict with the rules of the LWCF.

Beware: the National Park Service lays compliance with the LWCF and liability resulting from a lease, squarely in the lap of State Parks with the NPS August 12, 2019 missive. NPS will not help if the State or the City of Kenmore causes legal liability. There is a strong possibility that the City of Kenmore would sue State Parks if mid-development or after development, State Parks requires public access more specifically than in the lease in order to comply with the LWCF rules, and the National Park Service will ping pong the liability back to State Parks even if NPS had okayed the lease. Most likely NPS will exercise caution and not even comment on such a lease between State Parks and the City of Kenmore.

I could understand how State Parks took a chance with Kevin Daniels to be as good as his word, believing he would adhere to the letter and intent of the lease, and how State Parks believed NPS had thoroughly reviewed the lease, and now there is trouble at State Park Commissioners' door. Are the Commissioners willing to take another big chance with their budget, perhaps the broader State budget, that the City of Kenmore is as good as its word? This is the city which could not get organized to admit to the trees that would be cut in 2007 and more recently tried to finesse what is allowable under city code. Field expansion into a wetland buffer is not normal City of Kenmore code. Who knows what language the City's seasoned attorneys will put in the lease to finesse restriction of public access. The City of Kenmore may not even be able to fulfill its promise of an income stream. How much is peace of mind worth to the Commissioners, to you?

#5 The forgotten history which State Parks has a pledge to protect could be an interesting and fun avenue to pursue. I am thinking a large cross-section of a mineralized tree from the sunken forest where salmon hide, near the outlet of the Stream #0226, a depiction of an Indian burial high in a cedar tree, the nest of an eagle family --likely to be relegated to history if development proceeds unchecked. Before this land was logged by one of the Freemans, it was a burial ground for the Lushootseed speaking people, known as the People of the Lake. Unfortunately, the tribes apparently forgot this history calling the ancient name for the land, spiritual in connotation but most recently were perplexed by its meaning. Research leads to the meaning as burial ground with the warriors interred high in cedar trees watching over the villagers and Lake, their families interred below. Proof of this interpretation, which is in additional documents regarding Indian Grave Point and farmers first hand accounts, could also be found in official excavations of the corner trees of this once Freeman property. If fair evidence is pursued, the corner entry marker at the park has been moved to accommodate a metal marker.

Such research on the burial site would be egalitarian. The Tribe's interests would likely be piqued by this sacred and interesting heritage, interesting to all. The historic salmon spawning ground might then find a more vociferous ally in the Tribes. It is my understanding that the Tribes already support WRIA 8. How have the Tribes been alerted, a notice to one person or a broader alert? All Native peoples are not the same in their interests of historic preservation or environmental preservation.

Well beyond the ancient history and especially the Seminary's history, this land is meaningful as the last natural land on Lake Washington. In a megalopolis where people are crowded in apartments, this natural land is historic in itself. It should be preserved as it was intended as a park to renew the human soul and body, a rarity for city dwellers, not for its scandalous Catholic history as a remote boys' school where 17 staff members were known pedophiles.

The conclusion reached by the State Park Commissioners in 2007 is worth repeating: Saint Edward State Park is a regional park that should ignore specific interest groups defined by geography. It should not allow the City of Kenmore to bring to the table interests specific to City of Kenmore. The current majority of Kenmore City Council members are depending on a local Little League voting bloc and support the playfield development -- over the objections of at least three elected Kenmore City Council members. A new election is coming. Wait for it.

Dear Ms. Logan,

As a concerned resident of Seattle, WA, I am fully in favor of St. Edwards Park in as natural a state as possible. Why installations like metal fencing and artificial turf would be considered for this park is confusing, at best. Auxiliary Lighting added should be researched for its environmental viability and additional need for this property.

Please consider mine and others plea to STOP & THINK before making these and other artificial additions/changes to this park which would make a negative impact.

I am writing to voice my opinion about the ball fields at St Edwards in Kenmore. I feel that it is a no-brainer to revitalize them. They are currently an eyesore in an otherwise beautiful park.

These fields should be renovated so that the children of Kenmore can have a safe, fun place to play ball. Currently, there aren't many other options and they are mediocre at best. Furthermore, if the fields were to be redone, it would attract more people to the adjacent St Edwards State Park. I am aware that renovating the fields is not cheap. However, I feel that allocating resources that improve our community and benefit the children is the way to go. I am positive that I am in the majority with my thinking. Please make the sensible decision and go forward with renovating the fields at St Eds.

Hi, Jessica,

I am writing in response to the request for comments on the scoping Draft Environmental Impact Statement for the Kenmore ballfield proposal to renovate and lease for 20 years the historic ballfields at Saint Edward State Park.

The decision to proceed with a full DEIS for the ballfield proposal was reached after the determination that the development is "likely to have a significant adverse impact on the environment". To many people, this statement alone is reason enough to dismiss the ballfield proposal entirely. However, I understand that a careful analysis of the adverse impacts can highlight what would be lost forever if the project is approved, and can help drive the decision process.

Saint Edward State Park contains the only undeveloped shoreline on Lake Washington, and it is the largest tract of protected forest with significant topography in all of urban King County north of I-90. The wilderness character of the park clearly makes it a unique and special place in the region. Since the development of ballfield infrastructure in the park would detract from this essential character, I believe that every one of the elements of the built and natural environment mentioned in the scoping document needs to be addressed fully in the DEIS.

Artificial turf, lighting, bleachers, and other similar construction are all intrusions into a park that is best suited for passive recreation. Their presence will obviously have impacts on the forests, wetlands, salmon stream headwaters, animals, and plants in the park. Additionally, artificial turf fields can be very fragile and may need to be strongly fenced off at all times, even when not in use. This would permanently remove usable land from the park, even in winter and at times of bad weather.

I am glad that there is a "no action" alternative listed in the scoping document, and I trust that the DEIS will make clear that this is by far the best option for preserving the core mission of the park as a wilderness. As a frequent park visitor, I have seen the proposed ballfield site used by a wide variety of people for picnics, informal sports, frisbee tossing, exploring the marshy areas nearby, and other random and spontaneous activities. Even the current use by an cricket league has far less impact than the major infrastructure of artificial turf, lighting, and wetland bulldozing.

Thank you for taking the time to listen to my comments,

I am opposed to the current proposal to create a new ball field at St Edwards Park which would extend further into the nearby wetlands area, substitute a grassy area of the park with

artificial turf, and establish new bright outdoor lighting. I live adjacent to the park and walk there frequently. I believe the proposed changes would be detrimental to the natural feel and beauty of the park.

I'm writing to offer my concerns for Kenmore's lease and use of the field and the changes they propose to make to it.

Wildlife

According to a recent study, St. Edward State Park is home to robust populations of deer, bobcat, raccoon, weasel, mountain beaver, Douglas squirrel, owls, bats, reg-legged frog, and others. The health of these populations should be considered in any additions to park facilities, including the hardening of the field surface, night lighting, added fencing, and increased road traffic.

1. Field surface: Especially in non-summer months, local deer populations frequently graze in the field. A synthetic surface will prevent this activity.
2. Night lighting: The addition of lights at the field will affect neighboring wildlife that is active after sundown.
3. Fencing: Proposed fencing would block this important wildlife corridor.
4. Road traffic: Increased traffic to the park raises the chances of animal mortality, in that animals often traverse roads in their territorial movements.

Air Quality

1. Automobile emissions, including carbon monoxide and particulates: Local air quality could deteriorate. Increased traffic, through the coming and going of little league traffic, will add to automobile emissions, both in the park and in surrounding neighborhoods. We value clean air.
2. Carbon footprint: The added traffic, the capping of the natural field with a synthetic surface, and the installation of lights would add to the park's carbon footprint at a time when the State of Washington has pledged to lower its carbon emissions to 1990 standards by the year 2020. Instead, Washington's emissions have increased.

Water Quality

The field and its adjacent wetland form the headwaters of a creek that empties into Lake Washington, which supports kokanee and sockeye salmon runs. The people of Washington want to do everything in our power to preserve these iconic fish, important to the circle of life in our region. Making these modifications (installing drainage and capping the field with a synthetic surface) to the headwaters of this creek could negatively alter the quality of the water flowing into the lake.

Recreation

The field is already used by Camp Roots, Wilderness Awareness School, cricket leagues, and families and informally-organized groups playing pick-up soccer, softball, and frisbee, flying kites, etc. Most of this use occurs in summer although recreational soccer league teams often practice on the field in the fall.

In addition, because local deer often graze in this field during fall, winter, and spring, park visitors are often seen photographing the deer in this location. This field is one of the park's main sites of wildlife observation. It is adjacent to the park road and people with low mobility have the opportunity to see the deer without hiking or venturing a great distance from their cars.

It seems that by capping the field with a synthetic surface and putting it under the jurisdiction of Kenmore and the Little League, the use of the field would be merely trading one set of users for another. Children attending Camp Roots, Wilderness Awareness, and the families and informal groups, not to mention the local deer, would give up their use of the field for the little league and others.

Traffic

As a citizen of Kenmore who lives in a neighborhood off of Juanita Hill Drive, I can say that Juanita Hill Drive is already at capacity during the morning commute and every afternoon starting in mid-to-late afternoon and into the evening. This arterial does not need to serve any more cars trying to access the park at these critical times of day! I support sports fields for our children, but we need to locate them centrally in Kenmore to manage our growing traffic problems.

Thank you for your solicitation of citizen comments.

Ms Logan

I am writing to you with deep concern about the development plans for St Edwards Park. I am a native to this area and have enjoyed the green space in that area for many years. (Including the time during which my brother was a seminarian).

These days, development always seem to take priority. We have not done well teaching our youth that natural areas should best be preserved in their natural state. Instead, a variety of "work arounds" are meant to lower environmental impact as we destroy and minimize the actual natural areas.

Plastic turf, cyclone fencing, and lighting do not exist in natural areas. They do not belong in our state park. I urge you to not delude yourself nor the public by trying to look for ways to intervene. Stop destroying the natural area before it is too late.

Teach our youth and our citizens that we value natural areas and that they are beneficial to humankind. Too often anymore, people destroy nature and then look for ways to restore it. Why not stop before we begin!!

I pay taxes and purchase state park passes to support our state parks. Please use my resources wisely and in accordance with my values - a commitment to keep a natural area as a natural area.

I look forward to seeing your decision that shows that you will protect rather than destroy or minimize nature. I hope that you will consider the earth and its needs rather than facilitating greed and development. If we do not preserve the earth, nothing else matters.

I hope you will give full consideration to protecting nature - not by putting up a fence, but by restricting needless development. Yes, needless.

Thank you for your attention to this matter.

Wilderness Awareness School has been running nature education programs at SESP for over 15 years. We use the ball field area all summer long for multiple hours each day as the basecamp for our programs. We served over 535 youth from the local area at Saint Edwards in summer of 2019. This ball field improvement project will greatly impact our programs and we will no longer be able to use the area. We may be forced to relocate our programs to a different area farther away from local families.

We remain strongly opposed to this project. We stand for a Saint Edward State Park that remains focused on nature connection for all. Modern artificial turf fields, fencing, lights, and additional traffic for sports events are in conflict with this vision.

Thank you.

I am writing to express my concerns about and opposition to the ball field development proposal at St Edward's. The Determination of Significance Report already details the many negative environmental effects of the proposed project. It will negatively impact the land, plants, air quality and recreational opportunities for all users of the park. Concrete walkways are already proposed. The installation of artificial turf requires an underlayment, most often artificial foam or more concrete. The turf field will need to be spread with rubber chips or silicone dust for sports use. Concerns about exposure to lead dust with artificial turf fields have also been documented. To introduce these types of chemicals into a State Park is clearly inappropriate. This, along with resulting light pollution clearly can negatively affect all users of the park, not just those using the fields.

The proposal also negatively impacts recreation for visitors to the park who are not associated with youth soccer or Little League. The sports field is currently open to and used by all. The proposed fields would presumably be set aside only for those families paying to enroll in soccer and Little League. The State Parks are public facilities for the good of all, not just those paying to play sports, and again, this use is inconsistent with the State Park environment. Simply put, this is an urbanization proposal to be built on State Park Land. The nearby cities of Bothell, Woodinville and Kirkland have all built similar facilities on City land or on school grounds where concrete and electric infrastructure already exist. King County has also built facilities on county owned land. All of these facilities are within a short drive of Kenmore. The development of the Lodge at St Edwards is different in this sense, as it helps to preserve a key part part of the park's character (maintaining the historic seminary building.) The ball field proposal does the opposite by obliterating or adversely affecting the park's natural character.

An urban development project such as this needs to be done in the urban (or suburban setting) as all of these other entities have done. The City of Kenmore should develop these facilities on City of Kenmore owned land, and not by partitioning off part of the public State Park land for private activities.

I urge the Commission reject the ballpark proposal St Edward State Park is a gem of nature in the urban setting, and should be maintained for that purpose for all of the general public and the good of all Thank you for your consideration.

Aug. 29, 2019

To: Jessica Logan, Washington State Parks

I am a biologist on the environmental science faculty at the University of Washington Bothell and a Kenmore resident. I am very familiar with St. Edward State Park, as I have conducted field biology research there for the past 8 years. I am also aware of the desire for more athletic fields in Kenmore, as I have been a parent and coach for a Northshore youth soccer team. In my view, the proposed development's many serious environmental and social impacts affecting many Washington residents far outweigh the limited benefit to a small number of local residents. The development would represent a tremendous loss to Washington State citizens, as I believe a rigorous and comprehensive analysis of the impacts of the proposed project will demonstrate.

To be credible, the Draft Environmental Impact Statement will need to substantively address all of the issues I have listed below.

Thank you for your attention,

Potential toxic contamination

My understanding is that a "new generation" of synthetic turf is proposed for this project. This may be an improvement over older types of turf, which have been shown to have serious toxicity issues. However, we must be assured that the new turf doesn't present toxicity issues of its own. Potential toxicity of the turf should be explored thoroughly in the DEIS, using peer reviewed science as opposed to industry reports. The location of the ballfields at the headwaters of a creek that passes through some of the highest quality wetland and forest habitat in the park and empties directly into Lake Washington, suggests that a precautionary approach should be taken with this issue. In the absence of solid scientific evidence that the turf (including the associated drainage systems, etc.) is harmless, the DEIS must assess the impacts of potential toxics.

This analysis should include:

- Impact of potential toxics to the children who would use the turf
- Impact of potential toxics to birds and other wildlife that may stray onto the fields
- Impact of potential toxics to wetland and upland habitats and organisms, including macroinvertebrates, around the ball fields.
- Impact of potential toxics to the water quality in the stream draining the field area (and

to Lake Washington), and to organisms occurring in and around those water bodies.

Impact of toxic waste disposal when the turf (and subsurface drainage) must be replaced

Carbon footprint and loss of carbon sequestration

In a time when we are trying to minimize our carbon footprint, a synthetic turf field with night lighting is potentially counterproductive. An accounting of the carbon costs associated with the proposed development should be part of the DEIS. In addition to the loss of carbon sequestration of the existing field that would occur with the proposal, the analysis should include the carbon cost of the ball field's production, installation, operation (including lighting), maintenance, and replacement and disposal when it reaches the end of its lifespan. This should be compared to the actual carbon footprint of the current field, which is mowed occasionally only at certain times of the year.

Wetland loss

Loss of wetland and wetland buffer must be thoroughly addressed. If mitigation is proposed, the DEIS must provide a detailed demonstration that the proposed mitigation will be successful, given that wetland mitigation is often unsuccessful.

Hydrology impacts

The field will have a drainage system that may affect water levels and flow regime in the wetlands and creek downstream from the ballfield. This impact of these effects on water quality, slope stability, and wildlife must be assessed.

Impacts to wildlife

St. Edward is a unique natural resource and stronghold of biodiversity in the Seattle area. There is simply no other area of native habitat in the Seattle area that compares with St. Edward in size, diversity and quality of native habitat. As such, it is a unique natural resource for all Washingtonians, particularly all Seattle-area residents. It is also a designated Biodiversity Area and Corridor.

My field research has detected a large number of native wildlife species in the park, some of which are becoming rare in the Seattle area, e.g., northern red-legged frog, and many of which are protected under the King County Comprehensive Plan and Critical Areas Ordinance (e.g., n. red-legged frog, Townsend's chipmunk, Douglas squirrel, bald eagle, and many others; see Stokes and Samuelson 2019 Report to State Parks). One reason for the high diversity of wildlife in the park is relatively low levels of human disturbance, particularly in the evening, night, and early morning hours when many species are most active. The wildlife impacts of the increase in human disturbance that would result from the proposed project should be thoroughly addressed in the DEIS.

Specific topics should include:

- Impacts of noise and night lighting on disturbance-sensitive species, including native predators

- Impacts of noise and night lighting on bats using the field area for foraging

- Impacts of non-native or "edge" species (e.g., non-native rats, crows, domestic cats) that

have a greater tolerance for disturbance, and are able to exploit anthropogenic resources (e.g., food waste and food-soiled trash). Such species can negatively affect native species.

Impacts on nearby wetland and wetland buffer habitat, including the fresh water habitat found in the existing drainage ditches, and resulting impacts on the species occupying those

habitats, particularly birds, bats, amphibians and macroinvertebrates.

Impacts of loss of the field as a habitat for some species (e.g., bats, black-tailed deer, others)

Impacts of fencing on wildlife movement

Impacts of greater traffic on park access road, particularly evening traffic, on wildlife mortality

Social justice issues

St. Edward serves as the most accessible site for many Seattle area residents to experience relatively intact Pacific Northwest nature. Even those who cannot afford the time or money to travel to a distant national park can enjoy nature at St. Edward. The proposed development prioritizes the use of the park by local sports leagues over use by a much larger and broader population of visitors, many of whom are visiting the park for the natural values that are unique to this park. The DEIS must address:

- Impact of added disturbance in the form of added noise, lighting, and traffic on the visitor experience of those who come to the park to experience its natural values.

- Loss of wildlife viewing opportunities for park visitors. The most common place to see black-tailed deer is the grass field that is the site of the proposed ballfield development. This can be a highlight of a park visit for an urban dweller that will no longer be available if the ball fields are built.

- Loss of recreation area for diverse park visitors. The grass field is currently used by a great variety of people, including a large number of children at nature camps and informal groups, families, and individuals recreating or simply relaxing in the grass. A synthetic field—even when not use—will not serve these users. Aside from the loss of the living grass experience, synthetic turf becomes extremely hot on even a relatively mild summer day.

- Loss of environmental education potential and reduction in the functionality of the St. Edward Education and Research Center (EERC), funded in 2019 by the Washington State legislature. The wetland and wetland buffer associated with the grassy field are part of the natural environment that provides the focus for the EERC. The proposed development compromises the range of curriculum that can be offered, and thus compromises the value of the EERC program to potential students and participants throughout the region. The DEIS must address this loss, as well as the loss of the educational value of the field to environmental camps currently using the park.

Exclusion of other State Park users during periodic overloads of park parking capacity associated with organized sports events. If lawn parking is envisioned as a solution, a full accounting of the environmental impacts of lawn parking should be included.

Impacts to traffic congestion and air pollution on Juanita Drive. Traffic is already very heavy on Juanita

Drive with back-ups regularly occurring between Bothell Way and the Park entrance. It is likely that the proposed development would exacerbate this problem, with periodic pulses of vehicles driving to and from games and practices. The DEIS must include a thorough traffic study and analysis to fully account for this additional traffic. Air quality degradation in the park should also be assessed.

Loss of cultural value of the field in its traditional (and existing) condition. The existing field is part of the park's historic cultural landscape. It is difficult to imagine that the proposed night-lit, synthetic turf facility conforms to this historic landscape. The DEIS must include an evaluation of the impact of the proposed development on the historic landscape of the park.

Traffic Concerns for St. Edwards Park ball fields proposal

1. The traffic study is outdated since May, 2016, since changes in traffic patterns have occurred since that time.

Traffic routes from what would ordinarily use 405 North off the 115th exit in Kirkland, and meets more traffic that usually is extremely heavy coming from 520 at the Bellevue/Kirkland interchange. This now makes Juanita Drive bumper to bumper at evening rush hour when school is in session. I checked the timing in A WEEK WITH FAR LESS TRAFFIC,, a couple days ago. It took 2-1/2X's longer to travel - from Bothell Hwy(522) and and Juanita Drive, Kenmore, to 153rd Place and Lk Washington Blvd, Kirkland - than it took for the reverse trip north to Kenmore. (A friend is required to use this route at rush hour to come my way in Kenmore. We only schedule plans if I am able to meet her in Bellevue, not vice versa. People are unable to use streets they used to depend on, just happening within the past few years.)

2. Juanita Drive NE is the single/ONLY route off the entire hill between 100th Ave. NE on the East and Juanita Drive NE on the west and NE 181st St on the south, if going to Kenmore. There are no other routes to the west until you are nearly into Lake City. One other route to get off the hill is available, but that would take you east, nearly to the Bothell city center intersection. IN A TRUE EMERGENCY, people would not get off this hill. I experienced a temporary unexpected emergency closure of the bridge during repair work. This happened during rush hour. It took 1-1/2 hours to travel from 68th Ave NE and Bothell Hwy (522) and up , Simonds Rd.NE, and NE 155th St.. to 74th Ave. NE, a 6.3 mile trip. On this day, stuck in my car in pain after a dental bone graft and trying to get home for water to take the pain pill I just picked up in Kenmore, I began thinking VERY seriously about the pitfalls of access on this hill as related to evacuation procedure learned in the Northshore Emergency Management Training class by Northshore Fire District.

3. An extremely significant piece of information on traffic problems coming down the hill on Juanita is getting through the lights and onto Bothell Hwy. I believe that is where any studies of traffic connected to Kenmore need to begin. It is easy to see quickly that any additions to present traffic are not wise or acceptable. Using the entrance at St. Edwards Park entrance off Juanita Drive for a measure is not enough. The traffic that has begun at the 520 Interchange off Bellevue has thinned quite a bit at that point, but get to the next light at 155th and Juanita Dr. and it begins to pack up again. By the time you reach the Simonds Rd. light, it's very possible

to be in backed-up traffic to get to the turn onto Bothell Hwy and beyond that if the lights are backed up to Lake Forest Park Town Center if you are heading west. It is recommended that no increases along this route be added to present loads.

The intersection will be a "transit center" (I believe that is the term Sound Transit uses.) It would be good to know if any relief is in the works for this major intersection before a decision on adding more traffic to Juanita Drive is made.

I have not heard any discussion for solutions for this situation by the City of Kenmore with intent of moving traffic more efficiently from Juanita Drive/ 68th Ave NE onto the Bothell Hwy. The situation that exists is a bridge with 4 lanes and a by-pass road a few feet from the main light. Priority during rush hour is given to traffic on the Bothell Hwy(522), although the light is more recently running longer stretches at a time. Additional traffic will result as developments permitted by the City of Kenmore are completed on the lower section of Simonds Rd.

4. Light at entrance to St. Edwards State Park - It is already an unwanted annoyance to have this light going on and off constantly as you are driving from a larger intersection at NE153rd Place and Juanita Dr., to another large medium intersection at NE 141st St and Juanita Dr. These 2 lights are only .8 mile apart., should take 2-3 mins in normal traffic. But, having the light at NE 145th St. and Juanita Dr. breaking up the short distance, can increase this time by at least double if there is an event breaking up, class letting out and maybe 5-6 cars coming out from St. Edwards at one time.

5. Bike lanes, according to people who both commute on the Juanita route and those who ride mainly after work hours or weekends, are not completely adequate in spots all the way along the stretch of Juanita Drive. One bike rider said he does not feel safe due to no barriers between cars and himself, even a low curb would be better. Much of the route has loose gravel and is not smooth for bikes along the edge of the road. This fact would not affect the precise point where traffic turns in and out of Saint Edwards Park, but people hurrying to get places on time does decrease safety for bicycle traffic. (I refer to the entire route along Juanita Dr., not only the part within Kenmore. I believe this needs to be accounted for if a plan takes into account all factors.)

My neighbor used the route Juanita Dr to Bellevue, to get to work until she had an extremely bad bike accident, with 17 bones broken and more. It was going into downtown Kirkland, but definitely due to people in a rush during very early heavy am traffic. It's hard to know how many other accidents, since it's not often reported.

This last comment here is very general, giving a personal view, but shared with others, as to the quality of the decisions being made by the City of Kenmore. My basis of comparison is having lived in Gig Harbor during a time when community was involved in decisions on what types of businesses they wanted in their community, along with several permanent decisions made for long-term good, including no Wal-Mart, not being exclusive, but due to their business practices and treatment of employees. My other great experience with planning that is going to create long-term lasting quality in a community was being a stakeholder in a group

that planned what we wanted to see in the Minter Watershed. This exists in both Pierce and Kitsap Counties. Due to it being an environmentally sensitive area, we were able to find uses that would enhance, not damage, what exists there now. That type of planning is what is going to make our area sustainable. We need to be thinking long-term, especially in light of protection of environment, more fragile now than at any time we've ever known. I see we have an opportunity to make such a decision even on a small part of Saint Edwards Park. Doing the right thing gives a clear message to communities, as well. Places to play ball can be found without insisting they be in fragile areas.

6. We voted for walking paths along Juanita Drive quite some time ago. I have seen no signs of any work starting on that Kenmore project. I am signed up for information from the City, and receive items once in awhile. Their website is confusing and usually does not give me the answers I am seeking. So, it's a bit difficult to really understand what is happening at the City level. There are many issues I observe in which I feel our dollars could be more wisely spent - we have hardly any parks, high rise buildings are going up at a rapid rate, improvements are taking place on the area viewable by passers-by, but a lot needs doing in our neighborhoods regarding drainage ditches, sidewalks, street improvements - the basic things. There has been a lot of concern about housing for lower incomes, I served in a group working on this, but I hear nothing from the City on progress. The same with Metro. I served on a couple of different transit committees, but I have not seen that Kenmore is helping the situation other than to build a parking area behind the Park n Ride where there exists a heron rookery. It appears to be a lot of quick fixes and I'd like to see us doing a better job here at the headwaters of this important lake as seen in the entire scheme of things.

I cannot adequately convey the sadness I felt hearing the 'improvement' plans for St. Edwards. I am a native Seattleite but lived for 15+ years in Bothell. Single when I contracted cancer several years ago, I found solace and healing in the outdoors. Not well enough to go far, St. Edward's was a refuge where I could smell clean air, listen to birds, and take the trail to the water; all peaceful, soothing activities. I understand ballfields have value, but they don't belong here. The lights, extra exhaust pollution, wetland disruption, and noise is not what St. Edward's is about.

It is a welcoming place for family time without destroying something beautiful. There are other places for ballfields. This is a STATE park and the environmental evaluations show the irreparable harm these 'improvements' would cause; there is no coming back from that.

At a time when nature is in jeopardy everywhere, do not make this just one more paved-over, nature-ignorant place. Humans need green places to gather; it is good for the soul. I still visit St. Edward's though I live further north now. A dear friend who lives a mile from St. Edwards was the first to alert me to this issue; I applaud her and all the others who have spent a great deal of time educating themselves on the law, EIS's, State Park rules, guideline, and many, many other details concerning this situation. Also, I do not understand how the city of Kenmore has been able to attempt the appropriation of a State park to benefit themselves.

This project will negatively impact so many things. Earth (artificial turf, added pavement for parking, construction of covered bleachers, paved walkways), water (this is a wetland area, and buffers are important and should not be artificial turf), plants and animals (field lighting will not impact light-intolerant bats?). I do not believe the conclusions of the Kenmore studies,

such as lighting having no impact on wildlife, no noise effects from cheering crowds, and only 60 car trips a day will be generated. The parking issues will be overwhelming, impacting all visitors to the park. Two generations ago the use of the fields resulted in parking along the access road all the way to Juanita Drive. The park's grassy areas should not disappear to parking lots, and visitors should not have to circle the park to find a parking space due to the ball field use. The field lighting is so out of place in a state park, affecting animals, light and glare, aesthetics, and cultural preservation. Recreation in the park will be severely impacted, as hiking, picnicking, and enjoying the natural elements of the park will give way to organized baseball. Even those now using the field would be displaced; Kenmore states unscheduled use will be allowed before 4 pm weekdays, but that is when kids are in school and can't use it anyway.

List of alternatives only mentions turf and field lighting alternatives; why is there no mention of dugouts, covered bleachers, walkways, additional parking pavement?

A state park is no place to put little league fields. St. Edward State Park is a rare gem in our urban area. It is a place to find nature, away from the pace and noise of city life. I visit St. Edward to be among the trees, to hear the birds and the quiet, to see wildlife. The high use little league fields would put an end to all that. This forest and its ecosystem need the protection of a state park, not the significant adverse impact of developing a ballpark here. Artificial turf, dugouts and covered bleachers, field lighting, high traffic that requires additional parking...all these belong in a ballpark, not a state park. Please do not destroy our state park and set a dangerous precedent for other parks. Leave the field as it is now. Keep St. Edward State Park for all citizens to enjoy its natural beauty.

August 29, 2019

Jessica Logan
SEPA Specialist
WA State Parks
1111 Israel Road
Tumwater, WA 98501

Dear Ms. Logan,

. I live just to the south of the south boundary of St. Edward State Park, am past President of E3 Washington and have played a lead role in development of the Environmental Education and Research Center (EERC) at St. Edward State Park (SESP).

The currently natural ball fields are an important asset to environmental education, interpretation and community science research at SESP and are critical to successfully establishing and operating the EERC at the Park. I support the "No Action Alternative" and request that the Scope for the DEIS on the Ball Fields Improvement Project include Direct, Indirect and Cumulative Impacts to current and future opportunities to provide Environmental Education for our state's youth, families and other Park users that will likely result from the Project. This request is made based on the following rationale.

Benefits of Environmental Education – Research conducted by Stanford University including a literature review of 119 studies demonstrates that while Environmental Education (EE) clearly leads to increased understanding of environmental topics and issues, high quality EE also results in a wide variety of other positive gains, including improved academic performance,

enhanced critical thinking skills, 21st century learning skills, knowledge of STEM topics, higher standardized test scores, social and emotional growth, confidence, leadership, positive environmental behaviors and increased civic engagement. (Ardion, Nicole, et. al. 2017).

Environmental Education at St. Edward State Park - The 62-year lease authorized between Washington State Parks (Parks) and Daniels Real Estate (DRE) January 9, 2017 included a 1200-2000 square foot set aside for public use, specifically as an environmental learning center. The title for the SESP environmental learning center was changed to St. Edward Environmental Education and Research Center (EERC) spring of 2017 to avoid confusion with Parks more rustic environmental education facilities. The location for the EERC was relocated from the Seminary to the Gym Annex summer of 2018 to provide greater independence and identity of the EERC from the Lodge.

A \$75,000 planning grant was authorized by the legislature spring of 2018 to support a planning grant to develop recommendations for programming, organizational structure and business projections to optimize outreach, interpretation, environmental education and community science programming for the greatest number and diversity of WA state youth and residents possible. Parks entered into a Memorandum of Understanding and Interagency Agreement with the University of Washington-Bothell fall 2019 to implement the nine-month planning process for the EERC. UW-Bothell assembled a Planning Team including an Organizational Development Consultant, and Environmental Education Specialist along with faculty and administrators to support the process. The rigorous UW-Bothell led EERC planning process included research into numerous day-use and residential environmental learning centers located across the country, input from over one hundred community members who participated in the three Public Engagement Meetings and recommendations from our Advisory Council.

The working vision and mission for the EERC developed through input from the Advisory Council and the over one hundred participants who attended the public engagement meetings is:

EERC Vision: The St. Edward EERC is a living laboratory where experience transforms learning and stewardship takes root.

EERC Mission: To provide integrated environmental education and research experiences to a broad and diverse community with the purpose of advancing public understanding, connection with nature, scientific knowledge and stewardship of Pacific Northwest Ecosystems.

The EERC planning process was completed June 30th, 2019 with an in-depth 75-page Final Report delivered to Parks including recommendations for environmental education programming, EERC organizational structure and sustainable business plan model. The Report recommends a comprehensive university-led environmental education model that integrates outreach and interpretation, life-long environmental learning, and place-based community science research, which combined, will provide a continuity of environmental learning opportunities for our youngest learners to older people seeking to remain actively learning in the outdoors. This innovative model will leverage faculty, student, research, and other resources of area colleges and universities including UW-Bothell, Bastyr University, Cascadia College, all of whom strongly support the EERC, into interpretation, environmental education, and community science opportunities at SESP. The university-led environmental learning

center model has been successfully field-tested and is currently operational at other universities including Colorado State University, Sonoma State University, University of Wisconsin Stevens-Point, and College of the Atlantic to name a few. Further discussion of these recommendations can be found in the St. Edward Environmental Education and Research Center Final Report delivered to WA State Parks June 30, 2019.

Direct Impacts of the Ball Fields Improvement Project to Environmental Education at SESP.

Direct Impacts to Existing Environmental Education Providers

The EERC Final Report recommendations make clear that we seek first to support the work of existing Environmental Education providers at SESP including the Wilderness Awareness School (WAS) and Camp ROOTs. WAS has operated at St Edward SP for over two decades, has provided its immersive environmental education programming to thousands of students throughout the Puget Sound region and makes heavy (and sustainable) use of the natural ball fields in its programming. During the summer of 2019 alone, WAS ran 14 week-long camps over their 9-week summer season which, in total, engaging 665 youth in their immersive nature awareness programming including such camps as Nature Adventures, Nature Explorers, Ranger Skills, etc. WAS summer camp programming makes use of the natural ball fields approximately four hours per day. Cumulatively, WAS is activating the natural ball fields for 665 youth in environmental education for 180 hours during the summer season. Likewise, Camp ROOTs summer program served 480 Campers and estimate making use of the Ball Fields for approximately 2 hours each day or 60 hours over their 6-week summer season. 235 Forest School, school year campers make use of the ball fields 10 hours a week during the full academic year.

Both WAS and Camp ROOTs seek to build awareness, appreciation and stewardship of the natural environment on the natural ball fields as instructors guide students in watching for birds and insects from the fields, hunt for tadpoles, frogs, salamanders and macroinvertebrates in the wetlands and drainage ditches adjacent the fields. SESP's anchor Environmental Education providers, Wilderness Awareness School and Camp ROOTs, will not subject their students to artificial turf, therefore will not be able to conduct critical aspects of their programming should artificial turf replace natural grass on the fields as a result of the Ball Fields Improvement Project.

Please consider direct impacts to SESP's existing Environmental Education providers, Wilderness Awareness School and Camp ROOTs and the hundreds of students they collectively serve in assessing impacts of the Ball Fields Improvement Project at SESP.

One could argue that WAS and Camp ROOTs could make use of other alternative open areas in the Park for the activities for which they use the ball fields. However, the only other open area is the Great Lawn which is also heavily used by other park users for strolling, dog walking, picnicking, etc. is in plain view of the Lodge and Lodge guests, is not adjacent to wetlands used for observation, and is not accessible to the public rest rooms also adjacent the Ball Fields. Use of the Great Lawn for EE is not an ideal alternative.

Please consider the true viability of other alternative spaces for WAS and Camp ROOTS opening and closing circles, non-competitive games, and wetlands species observation potentially available in the Park.

Direct Impacts to SESP's Environmental Education and Research Center

- There is no logic in investing in a serious effort to establish the EERC, including attracting new EE partners to support it, while at the same time displacing and/or significantly compromising the programming of existing partners, WAS and Camp ROOTs. Displacing our anchor Environmental Education providers will have a significant negative impact on successfully launching the EERC at SESP.

Please consider the viability of launching a new Environmental Education and Research Center while at the same time displacing existing Environmental Education providers impacts to current environmental education providers that would serve as anchor partner organizations with the EERC should the Ball Fields Improvement project be approved.

- The EERC's new environmental education and community science research programming will seek to identify, observe and monitor bird, bat, amphibians and other wildlife species that rely on the natural fields, edge forest, wetlands and drainage areas adjacent the natural fields. Installation of artificial turf on the 90% wetland buffer that currently constitutes the fields will both destroy the wetland buffer habitat and eliminate opportunities to develop and conduct wetlands and watershed science education programming geared to developing greater understanding of the importance of wetlands and healthy watersheds and lifelong stewardship for their protection.

Please consider the impacts of the Ball Fields Improvement Project to opportunities to teach wetlands and watershed science in the Park and the integrity of teaching these subjects while at the same time destroying the wetlands buffer that currently makes up the natural Ball Fields as a result of the Ball Fields Improvement Project.

- Destruction of the wetland buffer habitat and drainage ditches will also compromise the viability of bird, bat, amphibian and macroinvertebrate species populations and therefore diminish the opportunities to build awareness, understanding and a sense of stewardship for wildlife that live in these habitats through environmental education programming. Again, one could argue that these topics could be taught in other areas of the Park. However, there is a direct contradiction in any attempt to build awareness, understanding and a sense of environmental stewardship for SESP's ecosystems including the interconnections of wetland, field and forest habitats and the varied wildlife populations that depend on these habitats while at the same time destroying a large section of habitat in a central area of the Park.

Please consider the impacts of the Ball Fields Improvement Project to opportunities to teach environmental science and studies and build environmental stewardship while at the same time destroying a large segment of natural habitat as a result of the Ball Fields Improvement Project.

- Many youth programs which arrive in SESP via bus or van park in the lot, make use of the public restrooms adjacent the ball fields, and conduct orientation activities with their students on the natural fields. The ball fields and adjacent rest rooms represent the most accessible staging area for EE programs taking place in the Park.

Please consider the impacts to other youth programs that make use of the ball fields, its parking accessibility and rest rooms that could result from the Ball Fields Improvement Project.

Indirect Impacts of the Ballfields Improvement Project to the EERC and WA state youth and families.

The Ball Fields Improvement Project, Little League and Youth Soccer League play on the fields, and resulting increases in active recreation, noise, traffic and parking impacts which will have dramatic, irreversible impacts on the overall character of St. Edward SP. In addition to the numerous negative impacts to habitat and wildlife resulting from artificial turf and lighting, the Park's historic and current character as a place of retreat, reflection and learning will be replaced by noise, traffic, and parking impacts associated by the active uses of the ball fields. As noted above, all efforts to launch the Environmental Education and Research Center will be significantly compromised as a result of the Ball Fields improvement Project.

Therefore, collateral benefits to local families, K-12 schools, undergraduate students and other park users will also be seriously compromised by the Ball Fields Improvement Project.

- General Park Users - Hundreds of youth, families and other park visitors could benefit from informal interpretive opportunities developed through the EERC specifically for casual park users including for example, a SESP Jr. Ranger Program and guidebook, interpretive habitat back packs for self-guided hikes and interpretive signage throughout the Park including the ball fields. Daniels Real Estate Lodge guests and their families may also benefit from EERC field excursions, EE programs, lectures, and interpretive materials developed through the EERC. General interpretive programs would make use of the natural ball fields for program staging and orientation, observations and for forest edge bird and bat species, as well as of salamanders, tadpoles, frogs, other amphibians and macro invertebrates that live in the wetlands and drainage ditches adjacent the natural fields. If the now natural fields are replaced with artificial turf and the character of the Park changes to active recreation as a result of the new active sports complex, so too will these opportunities to engage general park users in environmental education, interpretation, and community science also be diminished.

Please consider the impacts to opportunities for interpretation, education and community science programming to providing general park users should the Ball Fields Improvement project be approved.

- Families –Current education providers at SESP who participated in the EERC planning process indicated that families in their programs would value expanded opportunities to engage with the Park and its environment outside of existing camps and after-school programs. They see opportunities for EERC programs to engage children together with their parents, building bonds with nature as well as with one another. Studies demonstrate a wide array of benefits of EE to children including a passion for learning, confidence, independence and leadership. As the character of the Park will change to active recreation and opportunities to stage EE programs on the natural fields will be eliminated, so too will these opportunities to engage families and their children in environmental education also be diminished.

Please consider the impacts to families who seek to engage in more and varied environmental education opportunities, including those that make use of the natural fields, should the Ball Fields Improvement Project be approved.

• **Community Members** - Community members who participated in the EERC Public Engagement meetings were very vocal in their desire to participate in environmental science research, monitoring and restoration projects. Community members want to play an active role in understanding the environmental health of the park and how it fares in the face of climate change, increasing use and other potential impacts so that they can help mitigate and restore the habitat of the Park and its environs. Participation in community science and restoration projects enhances not only the health of our ecosystems but also educates and strengthens communities. As the character of the Park will change to active recreation, and opportunities to stage these programs on the natural fields will be eliminated, so too will the opportunities to engage community members in community science research in the Park be reduced. Please consider the impacts to Community members who seek to engage in community science including monitoring of plant and wildlife species that make use of the natural fields that could result if the Ball Fields Improvement Project is approved.

• **Local schools** – Schools could benefit from opportunities provided by the EERC to link formal and informal education experiences leading to improved academic outcomes. The proximity of St. Edward State Park to both Northshore and Lake Washington School Districts provides a close-at-hand, accessible outdoor classroom for elementary, middle and high school teachers to engage in structured EERC programs as well as to work with EERC staff to custom-design field experiences relevant to their curriculum. Beyond these nearby student populations, the EERC's location provides a new education opportunity to diverse, underserved populations in North King and South Snohomish County. As the character of the Park will change to active recreation as a result of the Ball Fields Improvement Project, and opportunities to stage school programs on the natural fields will be eliminated, so too will these opportunities to boost academic achievement among students at area schools be diminished.

Please consider the impacts to students at local schools who would benefit from opportunities to link formal and informal learning opportunities, including environmental education that would occur on the natural fields that would result should the Ball Fields Improvement Project be approved.

• **Undergraduate students and faculty** – Faculty and administrators from University of WA – Bothell, Cascadia College and Bastyr University who participated in the EERC planning process enthusiastically endorse expanded opportunities for field studies, teaching and community applied project based learning opportunities in St. Edward State Park's natural habitats, which are extensive, intact, diverse, and accessible, including notably the natural ball fields--a unique combination in the rapidly urbanizing Seattle area. Such early career experiences build proficiency and environmental leadership as well provide opportunities for mentorship of youth, families and communities.

Please consider the impacts to area undergraduate students on opportunities to participate in field-based learning and conduct field research including on the natural Ball Fields should the Ball Fields Improvement project be approved.

• **Since field-based Environmental Education programs are concerned with connecting students to nature, youth and adults who participate in these programs gain from the numerous physical, mental and emotional benefits conferred through multiple connections with nature.**

The Nature Contact and Human Health: A Research Agenda project overseen by Dr. Howard Frumpkin, Dean of UW's School of Public Health revealed the research based benefits of nature connection--reduced stress, better sleep, reduced depression, greater happiness, wellbeing and life satisfaction, reduced aggression and ADHD symptoms, increased pro-social behavior and social connectedness to name a few. (2) Connecting youth to synthetic, artificial turf and lighting does not qualify as a nature connection experience.

As the overall opportunities to build a robust Environmental Education and Research Center at SESP will be significantly compromised, and opportunities to conduct programming on the natural fields be eliminated should the Ball Fields Improvement Project be approved, so too will the opportunities to connect hundreds of youth and adults to nature at SESP be compromised.

Please consider the impacts to opportunities to build physical, mental and emotional health and resiliency conferred through environmental education and peaceful opportunities for nature connection, including on the natural fields, should the Ball Fields Improvement Project be approved.

(2) Nature Contact and Human Health: A Research Agenda Howard Frumkin,¹ Gregory N. Bratman,^{2,3,4} Sara Jo Breslow,³ Bobby Cochran,⁵ Peter H. Kahn Jr,^{4,6} Joshua J. Lawler,^{3,4} Phillip S. Levin,^{4,7} Pooja S. Tandon,^{1,8,9} Usha Varanasi,^{10,11} Kathleen L. Wolf,^{4,12} and Spencer A. Wood^{3,4,1}

Cumulative Impacts to Environmental Education resulting from the Ball Fields Improvement Project

- Parking - The EERC will have parking demands of its own. While school groups may arrive in buses and vans, other community events such as interpretive tours, lectures, restoration events, community science research activities and undergraduate field courses will incur parking needs of upwards to 35 – 50 spaces.

Please carefully consider cumulative parking impacts from the Lodge, Ball Fields and EERC parking needs when assessing overall parking demand that would result should the Ball Fields Improvement project be approved.

Summary

The successful establishment of the Environmental Education and Research Center at St. Edward State Park presents WA State Parks with a one-of-a kind opportunity to launch a state-of-the-art facility and programming in partnership with area universities and which is fully aligned with the agency's mission to "Connect Washingtonians to the natural, cultural and historic resources; upholds the Land and Water Conservation Fund SESP purchase agreement which stated that St. Edward SP be utilized for passive, rather than active recreation. The EERC would engage hundreds of youth, families and a wide range of diverse community members in deepening their understanding of the varied habitats and wildlife that depend on these habitats, including the natural fields and wet areas surrounding the fields, that collectively make up the SESP ecosystem.

The EERC is specifically geared to helping to expand constituency State Parks, build Next Generation Park Stewards and provide career connected learning pathways towards college degree programs and careers in public lands management and other Green Economy fields.

The EERC is strongly supported by District 1 legislators, Senator David Frockt and Gerry Pollet as well as fifteen Environmental Education and community organizations and local colleges and universities which signed a Letter of Support for the Capital Budget Appropriation.

While the Ball Fields Improvement Project would eliminate only one distinct habitat in the Park, the destruction of the natural fields and surrounding wetlands is in direct conflict with environmental education whose goal is to build awareness, appreciation and stewardship for protection of the natural environment. Please include the likely adverse direct, indirect and cumulative impacts to current and future opportunities to provide environmental education, build environmental stewardship, expand and strengthen State Parks constituency, and develop NextGeneration public lands supporters among pre-16 youth, families, and other park uses in the Scope of the Draft EIS on the Ball Fields Improvement Project.

As a Kenmore resident and Northlake Little League parent, I urge you NOT to proceed with this plan to “improve” the St. Edward State Park ball field. For the last three years, my daughter has played practices on Kenmore Elementary and Lockwood Elementary ball fields. Her games have been in Brier, Bothell, Woodinville, even out in Cottage Lake. While it would, of course, be more convenient to have all of her games in Kenmore, I am more than willing to make the occasional 30-minute trip to a game if it means preserving our natural spaces.

I am not alone. In a recent survey (<https://tinyurl.com/y2ajyfxm>), 74% of residents said they regularly visit St. Edward State Park. We are lucky to have this great resource in our home town and we know it. On the same survey, Kenmore residents made it clear that we prioritize natural areas and trails well above outdoor multi-use athletic fields. In EVERY relevant question (Q13, Q14, Q15a, Q15b, Q15c, Q15d, Q16) residents rated natural areas were at the top of the list and athletic fields somewhere in the middle. I ask Kenmore government officials, for what purpose were we asked for our priorities, if not to guide City investment?

Unlike the recent deal to preserve the deteriorating Seminary, “improving” the ball field by building into 90% of the wetland buffer will have significant impact on the flora and fauna in the park.

For the last three years from March to June, my daughter has played ball for a few hours a week as part of NLLL. For the last three years from September to June, in all kinds of weather, my daughter has spent at least five hours every week outdoors in St. Edward State Park as a Camp Roots student. That is how my family has become intimately familiar with this field. Every Wednesday at 10AM, as I drop her off in this field, the kids are exploring this wetland environment. Every year they eagerly await the appearance of the tadpoles and salamanders. They find animal tracks and nests.

I realize Families for Active Parks in Kenmore has had their eye on this piece of ground for many years. I know they see it as an underutilized space, but that is only because they are not in St. Eds Monday through Friday, from 10 to 3 when this wetland space serves as a science classroom.

Again, I urge you, please preserve this space as is.

I would like to say that I am opting for no action on development of the ball fields, for the following reasons.

This area is a wild life habitat that I have experienced in early morning walks. I have seen deer grazing, coyotes prowling, thousands of frogs migrating and eagles flying. I have watched children in the summer programs learn about wetlands and the value of ecology,

There is a calmness in this space as an untouched and not recently developed area. A link to our past and a gift to future generations as an undeveloped raw land in a meadow like setting. It seems as the Lodge has developed it would be proactive move to assist with their success by promoting quieter, less busy surroundings to ponder the beauty of St Edwards State Park on. The ongoing expense of maintaining the Artificial turf is excessive for most of the citizens who would be paying for it.

The temperature of the turf is in the 100+ in moderate 80 degree days.

Replacement expense is excessive, perhaps every five years.

Lose flexibility as onsite parking

As this is the entrance to the open park, a modern sports complex would totally change the vibe and degrade first impressions.

Again, please consider the legacy that we leave our children, as open space is less and less abundant and that is all we have to share of the old times.

Consider Arrowhead Elementary for the field upgrade.

Thank you for your considerations,

To whom it may concern,

I strongly oppose the City of Kenmore's proposal to develop a new sports complex on the grounds of St. Edward's State Park. This would have significant impacts on the wetland habitat the park protects, the largely native wildlife and vegetation that inhabit it, and the ability for residents of this urban area to enjoy and engage with St. Edward's Park.

The disruption of the wetlands at St. Edward's in order to build a sports complex is entirely contrary to the Washington State Park's goal of preserving Washington's natural lands. Destroying the existing meadow to replace it with artificial turf, paved walkways, and artificial lighting is an abominable injustice to the natural habitat that has so far been mostly preserved.

Artificial turf introduces foreign, non-biodegradable plastic particles into St. Edward's. With increased activity, these plastic components will likely be tracked far beyond the boundaries of the fields, polluting the surrounding areas. Artificial lights are known to attract insects to an unnatural degree, which disrupts the delicately balanced ecosystem that exists in the park. Destruction of wetlands has been shown to contribute to reductions (or at worst, extinction) of wildlife populations, decreased water quality, and increased flooding. These risks to a valuable natural habitat far outweigh any financial or social benefit the proposed sports complex might render to the City of Kenmore.

St. Edward's is a much needed sanctuary for all manner of native wildlife in a predominately urban environment. The damage proposed by this development plan will never make permanent changes that can never be undone.

Additionally, sacrificing the open meadow to organized sports entirely shifts what should be the main attraction to a state park: the enjoyment of nature. A state park whose access to trails and hikes is inhibited by scores of players bustling to and from games is decidedly less attractive to those seeking the calm of the woods.

In regards to the proposed field alternatives, I advocate that no action be taken to alter the existing meadow. Any development would disrupted the current ecosystems of the meadow and wetlands. Rather, the City of Kenmore should be urged to explore other sites for the proposed sports complex that would exert a significantly lessened environmental impact.

I wanted to share my concern about the proposal to convert a grassy field at St. Edward to synthetic ball fields. That area is important ecologically, and adding artificial turf could have negative effects on the wildlife as well as the hydrology and water quality. Outdoor space is also important to public health, and while artificial turf could draw more children to sports, it also would introduce unknown health effects from both the turf and its underground drainage system through leachate, weathering of the turf, etc. Children would be particularly vulnerable to these exposures, and it is not possible, given the new generation of materials that would be used, to predict the health consequences. The park is a treasured place for the human and natural communities and not an appropriate place to introduce such an extensive synthetic system.

I have a doctorate in environmental health and have taught environmental science and public health for 15 years.

Thank you for this opportunity to comment.

August 29, 2019

Jessica Logan
Washington State Parks
Post Office BOX 42650
Olympia WA 98504-2650

Dear Jessica,

Please accept my statement of general opposition to the current St. Edward Ballfield Renovation Project. My principle concerns are for the integrity of the wetland - for both in situ and larger watershed functions - and the continuity of the many outdoor and environmental education programs that inhabit the existing grassy area.

My family and I frequent St. Edwards both on our own and, previously, as members of the Family Roots program. We have spent long mornings exploring the amphibians in the ditch and surrounding wet areas along the field. Contrary to section 5.3.2.1 in the 2017 Critical Areas Report, we have observed amphibians in various life stages over multiple years. My daughter very patiently netted (and returned) the first salamander she has ever seen, right there in the ditch. We've watched at least three species of dragonfly patrol territories over the grassy field. Pileated woodpeckers inhabit the edges and interior forest around the field. Migratory warblers and flycatchers utilize field edges and insects hatched from and drawn to the wetland. All this happens in a field easily accessed by people of varying physical ability, increasing equity in outdoor education.

The plan as it is will leave a severely diminished buffer for a professionally assessed, and personally observed, functioning wetland. Moreover, the impact of ballfield lighting on both the wetland and the edge habitat concerns me.

It surprises me that in this year, when our Sockeye are returning at the lowest levels since returns were recorded, we are talking about moving forward with negative impacts on wetland areas directly above our salmon-bearing lake. In this year, when we are scrambling to solve the decline of the Orca, we are disregarding the importance of small but functional wetlands that detain and filter water flowing into a Chinook-bearing lake.

Washington State Parks & Recreation has identified some possible alternatives through the EIS process. The lowest impact (natural turf, like at Bastyr, with no artificial lighting) would be the best of the no-action alternatives if the turf were not to be chemically treated. However, my support is for No Action. In fact, my support is for allowing a transition to a smaller mowed area and for invasive plant removal.

I close with a reiteration of my opposition to the St. Edward Ballfield Renovation Project. This plan disregards the importance of the existing ecosystem and community functions of this field, and its goals can be accomplished through utilization of existing locations or alternative development opportunities.

Dear Jessica,

I am writing this letter to comment on the scoping range of the EIS for the proposal to renovate the historic ballfield at St. Edward State Park.

Many people are surprised that the determination by the lead agency of “significant adverse impact on the environment” did not stop any further consideration of the proposal.

To me, this proposal should have been rejected, in part, because there are other nearby underutilized fields available for little league. There should be no bending of rules or diminishing of the truth to force this unnecessary ballfield renovation on the nature-loving public. I feel the underlying reasons for the unnecessary sacrifice of this area of Saint Edward State Park should be closely examined and scrutinized.

The loss of solitude that the Lodge will bring to the park will be significantly worsened by the ballfield renovation. Screaming players and fans, aluminum baseball bat clinking, the loss of natural ground cover, and the possible addition of future night-lighting will all ultimately negatively affect both nocturnal and diurnal wildlife.

There has been rapid loss of trees and green space in the Kenmore, Kirkland and Bothell residential areas, due to development. The tree canopy has dropped. This fact makes it even more critical to protect the wetlands and the wilderness feeling of the park. There are no adequate mitigation measures that will offset these changes, especially considering the presence of wetland and buffer.

Removal of the rip rap at the beach will sadden many parents whose children use the protected area as a safe wading area. And, the large boulders have been a welcome feature of the beach for child and adult enjoyment for decades. The orchard area has been pruned and enhanced by a local citizen for years. These areas should not be used as part of any “mitigation”. Little league and proponents continue to want to disturb one of the few remaining homes for wildlife while not utilizing the vacant fields available.

As a physical therapist, I know the value of varied types of sports and activities. The current field allows for much more flexibility of use than the proposed field.

Parking is a concern of many and has been discussed in detail. The trees in the area of the eastern parking adjacent to the field are grand and valuable to park users and wildlife. We do

not want to see any trees removed nor negatively impacted now, nor in the future, by parking demands from the proposed ballfield changes.

A vote for the lease and development of this field by Parks, in a way that may isolate it for private sports and denigrate the field for nearby hikers, children's groups, nature-lovers and wildlife, is highly suspect and deserves a closer critical look by the public.

All elements of the environment listed in the SEPA Guidelines (WAC 197-11-444) should be fully addressed in the EIS. All aspects are significant. Nothing should be removed from the detailed study (WAC 197-11-408[2][b]).

Personally, I would like to add that I have seen a lack of oversight and responsiveness by the City of Kenmore to myself and the Washington Department of Ecology regarding public safety during demolition activities for the Lodge.

This would be the 2nd lease of a significant portion of the park in a short time in the history of this beloved park. My family hopes Parks will vote for NO ACTION: the field used as it is currently used and maintained.

Thank you for reading and considering my comments on a park that means a lot to many frequent long-time users.

To: Jessica Logan
Environmental Program Manager
Washington State Parks and Recreation

RE: St. Edward State Park, City of Kenmore Ballfield's Development and Lease Proposal
Request for Comments on Scope of EIS – Determination of Significance

Date: August 28, 2019

I wholeheartedly support the No Action alternative.

It IS possible for the City of Kenmore to meet the needs of local sports leagues without using state land for this purpose.

The City of Kenmore should not be allowed to grant itself a "Critical Areas Variance" on state land.

Please refrain from referring to this proposal as an "improvement".

The term "improvement" is subjective.

Please use the objective term "development".

- You already know the results of all the studies and all the science.
- You already know that this development will have a negative and significant impact on the environment, plants, and animals. And humans - who need and seek what the ballfield now offers.
- You already know that parking at St. Edward State Park can already be challenging and will be increasingly so with the hotel/convention center combined with the sports complex development.

- You already know that traffic/parking studies for the hotel/convention center were not reliable and should not be used in conjunction with the ballfield development.
 - You already know that this development will occur in a significant Biodiversity Corridor and will have negative effects beyond the Park boundaries.
 - You already know that the ballfield, as it exists, is of historical importance that will be destroyed by the proposed sports complex.
 - You already know that our busy society is craving unencumbered natural space.
 - You already know that the impacts of the ballfield development must be considered in tandem with the impacts of the hotel/convention center. Since NO ONE knows what the impact of the hotel/convention center will be, it is extremely difficult to speculate about the cumulative impacts of both developments.
 - You already know that the existing wetland buffer is degraded. This is not a reason to degrade it further with Kenmore's development. (State Parks could mitigate the existing degradation by ceasing to mow it!)
 - You already know that Washington State Parks describes St. Edward State Park as "a place for serenity...a quiet haven in the midst of the urban bustle". The City of Kenmore's sports complex development proposal does not support this description.
 - You already know that the City of Kenmore's development proposal is in conflict with the Washington State Park Comprehensive Management Resource Policy (2010).
 - You already know that an open space can be considered fully utilized without hosting back-to-back sporting events. Ask any deer. Or child kicking leaves. Or frazzled adult seeking respite. Or fill-in-the-blank-in- innumerable-and-diverse-and-creative-ways.
- It is baffling to me that in the 21st century, with our advanced understanding of the environment and our human impacts on it, that State Parks would be considering a proposal for a development that is so obviously an environmental step backwards.
- Because of many actions and decisions by the City of Kenmore over recent years concerning St. Edward State Park and other projects, I am concerned about the Washington State Parks "partnership" with the City. Some of the troubling actions and decisions to which I am referring are:
- During the Kenmore City Council meeting on April 22, 2019, it was noted that by 2021 city expenditures will exceed revenues. This information was also published in the Summer 2019 issue of the Kenmore Quarterly. This is the same city who has already spent roughly a half million dollars on this ballfield development proposal. This is the same city that claims will have a million dollars every ten years for artificial turf replacement.

- During the Kenmore City Council meeting on March 4, 2019, Rob Karlinsey, City Manager, commented about the cost of possible upcoming ballot measures: “In my experience, EVERY project is 50% more than projected.”

During the same council meeting, responding to agenda item IV.B. (Upcoming Ballot Measures), Mayor David Baker asked, “When will voters say they’ve had enough?”

The City of Kenmore has not adequately and regularly informed residents of the costs to-date of this proposed development or of the projected future cost (will they factor in Mr. Karlinsey’s +50%?). Neither has the City of Kenmore provided an opportunity for citizens to vote on this project. Kenmore citizens have been under-informed about the actual cost to them, now and in the future, of this ballfield development proposal.

- Support for this ballfield development is NOT unanimous among the council members.

- The City of Kenmore has not exhausted the possibilities for working in partnership with the Northshore School District. Although they have made an attempt, they have not spent anywhere near the time or money or creative problem solving in pursuing this logical solution as they have in pursuing the STATE park location.

Rob Karlinsey, City Manager, said during the City Council’s retreat in January 2019 that he was not in favor of “going down two paths at the same time”. (The two paths being 1. St. Edward State Park and 2. Northshore School District)

State Parks is requiring that other options for a city ballfield be explored. The Kenmore City Manager has made it clear that he is not committed to doing that while there is any possibility that they might “get” state land.

By usurping STATE land for the CITY ballfield, Kenmore will have complete control of the use of the ballfield.

Yes, if the City of Kenmore were to partner with the Northshore School District, they would need to share and compromise.

- The City of Kenmore was in negotiations with Weidner Apartment Homes for the development of Lakepointe. (Negotiations have since been terminated.) At no time during this process did the City publicly mention/insist/recommend that the development include a public/private partnership for a ballfield. Although the City has claimed that there is “no flat place left” (except for the State Park) to locate a ballfield, Lakepointe would be an ideal location in downtown Kenmore along the route of public transit. And it’s flat.

- In January 2019, the City of Kenmore conducted a “statistically validated” Community Survey for the Park Recreation and Open Space plan update. Survey results indicated:

- o 79% of respondents are satisfied with the number of city-owned parks and recreation facilities
- o Top priorities for investment did NOT include ballfields
- o Top priorities for investment DID include “natural areas/reserves”

- o Only 33% of respondents have a need for outdoor multi-use athletic fields
 - o Kenmore's current outdoor multi-use athletic fields fully, mostly, or partly meets the needs of 72% of respondents
 - o Less than 5% of respondents consider outdoor multi-use athletic fields to be most important.
- Combining "most important" with rankings of "2nd, 3rd, and 4th most important" yielded 12%.
- o 61% of respondents are very supportive of acquiring properties to preserve natural open space and wildlife habitat compared to 29% who are very supportive of upgrading or developing outdoor multi-use athletic fields
 - o When presented with a list of possible actions for improving/expanding parks and recreation, acquiring properties to preserve natural open space and wildlife habitat was ranked third from the top at 25%. Upgrade or develop outdoor multi-use athletic fields was ranked fifth from the bottom at 8%.
- This proposed development is taking away a resource from every state resident for the benefit of a very small subset (Little League, soccer) of a very small town.
How does State Parks justify that imbalance?
- Full survey results can be found here, the agenda for the May 13, 2019 City of Kenmore Council Meeting.
Scroll to IX. Business Agenda
B. Click on Presentation
<https://kenmore.civicweb.net/filepro/documents/94465?preview=97349&attachmenturl=%2FFileStorage%2F59B18CE1FB40414B9F4AD63362B15921-2019-05-13%252520Updated%252520CityCouncil%252520PROS%252520Survey%252520Present.pdf>
- The City of Kenmore recently assumed responsibility for Public Works (previously shared with neighboring Lake Forest Park). The first choice of the city was to locate the Public Works facility in a residential neighborhood. The Public Works facility was not compatible with residential zoning. Their reasoning was that there was no other suitable place. (Does this sound familiar?) I can only speculate that the City of Kenmore determined that it could grant itself a zoning exception of some kind. I can only speculate that they were faced with legal opposition. The facility is now more appropriately located along Bothell Way. It is interesting to me that they were able to find a place for this facility when they were forced to.
 - The City of Kenmore has indicated that while they will have the complete authority to schedule events on the ballfield, they will leave "open slots" for passive recreation. Can you name ANY way that one would enjoy passively recreating on artificial turf?

Lie on the plastic and watch the clouds go by? Spread out a blanket on the plastic and have a picnic? Open out a lawn chair under the trees next to a field of plastic and read a book? I don't get it.

- The City of Kenmore offered to mitigate the massive negative effects of the development with superficial and cosmetic improvements to the Grotto, Nun's Garden, and Orchard. Apparently, they (and State Parks) are not aware that the Nun's Garden has already (as of last fall) been completely restored and maintained by St. Edward State Park's volunteer gardener and is now being consistently enjoyed by park visitors. She also maintains the Grotto impeccably. Perhaps no one from Parks or the City of Kenmore has been there recently to notice. The local garden club along with a variety of arborists would gladly volunteer to prune the Orchard. State Parks needs only to ask!

- Following the "bat study", the City of Kenmore, in their reporting to State Parks, focused on the common bat (which would not be seriously impacted) and ignored the more serious impact to another species of bat in the park. This was a misleading interpretation of the science.

OTHER CONCERNS:

- I am concerned that few people know about this proposal. Yes, it's on the Parks website and on the City of Kenmore website, but those websites may not be read by the majority of Washington residents.

My friends in neighboring Seattle, Kirkland, Bothell, Lake Forest Park, Shoreline, Edmonds, Woodinville are largely in the dark.

This is a STATE park, not a City of Kenmore Park. The citizens of Washington will be short-changed on this valuable and unique state resource if Kenmore's development proposal is approved. Those state-wide residents have not been adequately informed.

- I am concerned that mitigations may be allowed off-site. How does an off-site mitigation actually mitigate the damage done to the St. Edward field and immediate surroundings including streams?

This development proposal by the City of Kenmore is in direct conflict with Washington State Parks description, policies, and mission. It is not supported by the majority of Kenmore

residents. It is an affront to the gem that is St. Edward State Park and to forward-thinking environmental stewardship.

I support the No Action alternative.

I disagree strongly with the proposed changes to be made to this State Park property.

I grew up in the Bothell and Kenmore area and as an adult refereed youth soccer on the St. Edward's property. I also have friends that live in the area that I visit with. I understand the need for locations for "organized sports". I'm 73 years old and grew up playing Little League Baseball and Pop Warner Football. We often played on school playgrounds and often less. As an adult I was employed by the City of Bellevue as a Law Enforcement Officer for over 30 years. The City of Bellevue started early, purchasing and maintaining natural areas within the City Limits. Not to cover them with Astro Turf, or whatever they call it now, but to maintain them in their natural state, with some allocations for grass fields, forested areas, horse trails and other outdoor areas. They are still applauded for their foresight. As a City Employee I was also in positions that afforded me with direct participation in the planning that occurred to limit the impact on existing residential areas and other land use areas. I am also an outdoor person and an ecologist. We need live plants, not plastic, concrete or blacktop. I understand that research on the proposed changes not only don't support them as a positive ecological change, but in fact indicate that they will have a negative impact on the property and the surrounding area.

As stated above, I strongly disagree with these proposals and as a voter in the State of Washington ask that the proposal be denied.

Dear Jessica,

The proposal by the City of Kenmore to develop ballfields and all that go with them would forever change the character and ambience of St. Thomas State Park. State Parks has already determined that this proposal is likely to have a significant adverse impact on the environment including wildlife.

This land is a STATE park, not a city park, not a county park. It is preposterous that the City of Kenmore be given authority to alter (arguably destroy) a significant part of it for the "benefit" of such a narrow demographic.

I beseech, implore you from the bottom of my heart, preserve and protect St Thomas State park as it is, for the benefit of ALL of our state citizens. It is a gem.

I am against the turf for the saint Edwards state park.

This bull crap is why we're leaving Kenmore. Poor spending habits that are not thought out. Not to mention detrimental to the wildlife.

How about repaving Simonds?

Fixing the bridge on 168th? (That will continue to sink year after year if not properly corrected)

Maybe try prioritizing Kenmore's spending habits.

Kenmore should start spending on improvements that will benefit a majority of residents instead of a minority.

Hello! My sincerest apologies that I am sending this email past the deadline of 5:00pm on the 30th. For whatever reason, I had the 31st as the deadline in my head. Consequently, I understand if my comments cannot be taken into consideration.

To briefly summarize the questions/concerns I have regarding the proposed ballfields at St. Edward State Park:

- Turf spread: How far will the infill material from the fields travel? I am concerned about the fact that these proposed ball fields are right next to active forests and wetlands. Can it be studied to see how far the crumb rubber, or other material chosen to be the infill material in the fields will spread? Will these enter the forest and damage the forest ecosystems present there?
- No more bugs: I assume bugs will cease to be able to survive in these fields, how will this impact the species that rely on them? How will this impact species that use the park as a transient stop in migrations? How will this affect the overall ecosystem of the park?
- Managing the Trash: Whenever I visit an artificial field for any sport, the trash cans are overflowing, there are sunflower seeds strewn everywhere, along with cigarette butts and excess plastic. How will the presence of these foreign materials affect the ecosystems of the park? Additionally, who would be responsible for cleaning up? Who's payroll would they be on? How often would they be there?
- How often would the infill material need to be replaced? What environmental impacts will this cause (I.E. what machinery will be used)? Will there be offsite environmental impacts by just disposing of the infill material or will it be reused elsewhere?
- What would be powering the maintenance of the ballfields? Often I have heard that one saving grace of turf fields is that they do not need to be mowed. However, what would be used to maintain the fields (I.E. brush them)? Would these machines be using gasoline?
- Erosion: What is the exact plan to replicate the natural groundwater flow into the streams of the park so as to reduce excess erosion or drought?

Thank you very much for your consideration of these comments, and again, apologies for the lateness.

Hi Jessica.

I'm writing to speak out against development of the grassy fields at St Edward SP. I've heard there is a risk of this field being taken over by the City of Kenmore and turned into the City's ballfield complex.

I am against this plan! My reasons are as Follows.

- 1) Lighting at the park at night will spoil the tranquility of the park for the people of our state. It will also be disruptive to wildlife who are being squeezed out of their homes by rampant economic & housing development in this area.
- 2) Artificial turf fields are being studied as toxic and carcinogenic! The fact that parents allow and encourage their children to play on these kinds of fields is a travesty. I feel sorry for the kids.
- 3) Chain link fencing is ugly and restrictive. Why should only sporty people be allowed to use that field?? My kids currently use it as a part of their environmental education through Wilderness Awareness School and Camp Roots.

MOST OF ALL: Saint Edward State Park is a STATE Park. It should not be taken over by the City of Kenmore for the use of their sports teams, that is unfair to EVERYONE who uses the park! If they want to schedule a game there, fine, but the rest of us should not have to endure FURTHER changes to our State park because of their selfishness.

I'm sure Kenmore's local elementary or middle school fields could be upgraded and improved for Kenmore sports team play, and that's as it should be. Leave our State Park in peace!

To: Jessica Logan
Environmental Program Manager
Washington State Parks and Recreation

RE: St. Edward State Park, City of Kenmore Ballfield's Development and Lease Proposal
Request for Comments on Scope of EIS – Determination of Significance
ADDENDUM

Date: August 30, 2019

Cristiana Pasca Palmer, the executive secretary of the UN Convention of Biological Diversity has just called for countries, companies, and consumers to build a new relationship with nature to stabilize the climate and prevent ecosystems from declining to a point of no return, with dire consequences for humanity.

She explains, "The risk is we are moving toward the tipping points that scientists talk about that could produce cascading collapses of natural systems."

That Washington State Parks may be complicit in the City of Kenmore's proposal to destroy the natural environment (in essence, collapsing a natural system) at St. Edward State Park is unacceptable.

Why would State Parks consider moving in the direction of destroying, rather than protecting, the natural environment?

To compromise any part of the environment at St. Edward State Park for the desire (NOT NEED) of a very small segment (Little League, soccer) of a very small town is preposterous, outrageous, absurd, and unnecessary. (This development proposal is NOT supported by the majority of surveyed citizens.) I am not surprised at Kenmore's proposal. I am disappointed that State Parks would entertain such a proposal. I prefer to believe that State Parks is a better, more enlightened, forward-thinking steward of our land. Climate change must be considered in the scoping of this development. In solidarity with the UN, I support the No Action alternative.
Washington State Parks Commission: Thank you for your time and expertise as you consider a course of action regarding Kenmore's needs and proposal. If any and all existing athletic fields in the area could become fully utilized, might the City Of Kenmore be able to expand its athletic events capacity? At the same time, could St. Edward's State Park be undisturbed and not be impacted at all? You have far more information about the preceding than I ever will know or understand. Your careful analysis of all aspects is appreciated.
August 29, 2019 To: Jessica Logan, Environmental Program Manager Email: jessica.logan.@parks.wa.gov Washington State Parks and Recreation Commission: Thank you for taking the lead in requiring a full EIS in studying the Kenmore Ballfield proposal. I am heartened to read that the Commission, as lead agency, has determined this proposal <i>is likely to have a significant adverse impact on the environment</i>. I urge you to include in the scoping ALL Natural Elements of the environment and <i>particularly important</i> issues within the Built Environment which are listed in the SEPA Guidelines: Natural Elements – Earth, Air, Water, Plants and Animals, Energy and Natural Resources, Critical areas. Built Environment – Environmental Health, Noise, Light and Glare, Aesthetics, Transportation and Parking. I believe the Kenmore Ballfield proposal is detrimental to every aspect named above. To me, such a development at the core of St. Edward State Park is contrary to the very mission and vision of State Parks: Mission: "...to care for Washington's most treasured lands, waters and historic places; connect all Washingtonians to their diverse natural and cultural heritage; and provide

memorable recreational and educational experiences to enhance their lives." (*underlines and bold font added.*)

Vision: "Washington's state parks will be cherished destinations with natural, cultural, recreational, artistic, and interpretive experiences that all Washingtonians enjoy, appreciate, and proudly support."

Is a municipal ballfield complex a cherished destination? Is it available for all Washingtonians? Can you, our appointed preservers and caretakers of public lands, along with "all Washingtonians enjoy, appreciate, and proudly support" the magnitude of change this proposal would bring to the core of this park? This, "the largest remaining undeveloped area on Lake Washington. " This, "place for serenity". This, "quiet haven in the midst of the urban bustle. " (St. Edward State Park brochure.)

The EIS should include: At least these issues, and probably more...

- An analysis of the dollar cost of artificial turf, including maintenance (and replacement) throughout the years of the lease plus the intangible costs to the environment of removing that great amount of living grass and soil.
- Complete engineering and cost analysis of the sub-structure under the artificial turf.
- Science-based answers to the questions of health of those who play on artificial turf. The Commission should have a plan for what will happen to the land after the 20-year lease.
- A technical drainage and hydrological analysis of the wetland and buffer and other critical areas. We need to know how the wetland and buffer work, what would be lost by removing or diminishing those areas? What effect might climate change have on these special places?
- An analysis of the pressures and possible negative impacts upon the valuable trees near the field's perimeter. In the previous SEPA checklist submitted by Kenmore, there were precautions taken for the trees, but it stated specifically that there was no guarantee that those precautions would succeed in preserving the trees.
- An analysis of the cumulative impacts affecting park users and wildlife, of Daniel's renovation of the seminary into an 80-room hotel/conference center AND the ballfield proposal. (Traffic, noise, etc.)

Further comments:

Kenmore should not be issued a *Critical Area Variance* permit.

Need . Kenmore's 2017 Supply and Demand Analysis presented its case for needing new fields. Yet, if Kenmore did what its neighboring city has done (create partnerships with the Lake Washington School District), there might be no need for their proposal. I wish the Park Commission would *require* the City of Kenmore to further explore cooperative use of acceptable fields within the Northshore School District. Serving the needs of youth is a prime concern of the schools.

With the help of a \$600,000 grant from King County, Kenmore did succeed in adding a field this summer. It is located in Moorlands Park which is within two miles of St. Edward State Park.

Bothell-Kenmore Reporter, July 12, 2019: The city of Kenmore celebrated the opening of the new Moorlands Park at 15221 84th Ave. NE with a ribbon cutting on June 23.

The park features new ballfield renovations (booking begins in 2019), new restrooms, new picnic shelter, a perimeter path and play area upgrade. The ballfield will be the first owned and programmed by the city of Kenmore.

Truly a community project, the Northshore School District, North Lake Little League, Northshore Youth Soccer Association, neighbors, elected officials and city staff worked together to make this project happen, according to the city.

Use of Park. As you know, St. Edwards Park was established for passive recreation. The proposed ballfield is not passive recreation. Further, it will not be available to all Washingtonians, except when not being used. When will that be?

The field is being used (with fees paid) currently by two groups who rely on the grass field: The Wilderness Awareness School and a Cricket Team. If grass is what they need, artificial turf would displace them. Reducing the diversity of users feels wrong.

What feels right is supporting the new **Environmental Education Learning Center** (part of the Daniel's Seminary renovation contract) by keeping the rich resources of the open ballfield, wetland, wetland buffer and surrounding forest available for exploring and teaching youth (and adults) about water cycles, healthy ecosystems, and all sorts of environmental science. This vision is full of dynamic potential. It will be creating future stewards for our earth. UW of Bothell is already doing studies of – and removing - invasive species within the park. Whereas, artificial turf is dead, this small treasure in the heart of the park is alive.

Public Health. I see articles nearly every month now urging us to go to a nearby park for our health. Doctors have begun writing prescriptions for this. Organizations are helping to bring young people who live far from forests and parks into them. Cities are tucking more parks into smaller areas. New York City has completed an eight-year project to plant 1 million trees. "Forest bathing" (spending time in nature) is getting to be a "thing". (Cover story, Fall 2019 Pac Med Health Newsletter.)

Dear Commissioners...So many questions, so many issues. To what end? What does State Parks gain from the Kenmore proposal? What do regular park users and visitors gain?

Don't we love the park enough to recognize the gifts it brings to us all, to our local ecosystem, to the wildlife within it and birds who fly over it?

Let us be mindful of what we will lose if the ballfield proposal is given a green light. For me, and others who deeply appreciate the park as it is now - its history, its quietude, its habitat for wildlife, its life-giving qualities to our evermore populated, urbanized area – these are gifts we embrace and cherish. We feel in our bones the importance of preserving such unique and special places for our children and grandchildren and others who come after.

When the EIS is completed, I hope its findings, based on accurate science and engineering studies will strongly support the premise that this ballfield complex is not appropriate for this place. I hope the Commission will agree and choose **Option 5: No Action – how the field is used now (no lighting, existing grass).**

I appreciate the opportunity to comment and your consideration of these thoughts.

Dear Ms. Logan,

I am writing to you to express my strong opposition to the City of Kenmore's proposal to develop Saint Edward's State Park's sports fields.

Saint Edward's State State Park, or St. Ed's, as regular visitors of the park affectionately call it, is a treasure of natural forests and trails and undeveloped lake shore in the middle of urban/suburban sprawl in the East Side. The only reason that it has survived like this is the fact that the property was made a state park in 1977. And as a state park it belongs to all people. It is a travesty that the City of Kenmore wants to claim it as vacant land that they could "improve" by installing artificial turf and light towers, which will ruin the land and disturb the peace of the park. If Kenmore wants to build a sports complex, it can follow Woodinville's example and built one at the center of town, where this kind of facility belongs.

In contrast, the reconstruction of the old seminary building saves an old landmark from decay and gives it new life. Restoring this historically and architecturally significant building honors the workmanship of skilled masons of a bygone era and pays tribute to the park's own history.

There are dozens of sports fields all over the towns in the north end of Lake Washington. There is only one St. Ed's.

Please consider what a wonderful, unique, natural park Saint Edward's State Park is. We need to be good stewards of this land and keep it for everyone to enjoy, including the future generations.

Hi Jessica

One quick after thought to add to my file.

My support of the No Action Alternative is actually support of an Active Alternative as it leaves the natural ball fields Activated for many, varied environmental education usages. This includes the currently Active Use of the Field by Wilderness Awareness School and Camp ROOTs which are collectively providing high quality environmental education to over 1000 youth from throughout the Puget Sound region. It also includes the Active Use of the natural ball fields for the many, new and varied environmental education topics, programs and activities that will be developed, and which will Actively utilize the natural ball fields, through the St. Edward Environmental Education and Research Center.

Just wanted to add this final end note to my comments.

That's it from me for now.

We are in the midst of a climate crisis. We need to retain every cubic inch of natural soil that we already have. A natural biome absorbs carbon at a high rate. Artificial turf installation requires the destruction of the existing soil. On a warm day, artificial turf has been shown to have temperatures so high that it can burn unprotected human skin. We shouldn't be creating heat.

There are too many unknowns with the type of underlayer the city is proposing. Coconut isn't indigenous to the Pacific Northwest. It has been shown to produce a fine dust, but it is not

known what the effects of this dust would be on children or on downstream plants and fish. The fish population is already too stressed. And the orca population is also stressed. This non-native material all goes downstream and is disrupted every ten years when it's replaced, causing more downstreaming.

Installing lights would stress the bat populations. A state study found six species of bats, including a state-monitored bat. Since there's an almost endangered bat living in this oasis of darkness, we should give it every opportunity to thrive, including darkness. The proposed clients of an artificial turf, lighted ballfield have other opportunities to thrive in their hobby of baseball or soccer. These bats don't.

I am a longtime volunteer for the Washington Chapter Sierra Club's Political Committee and Beyond Coal Campaign, and a volunteer for People for Climate Action. I believe the State Parks have a wonderful opportunity to take the lead in climate crisis management. Retaining natural soil and maintaining healthy tree canopies are a big part of that. Thank you for your attention.

Dear Ms. Logan,

I have spent much time over the past two weeks reading the City of Kenmore's proposal and about wetlands. In addition, my son and I have been attending Community Action Training School, which is focused on citizen education about our watersheds (specifically WRIA 7 and WRIA 8) and salmon recovery. My son and I have talked a lot about the City of Kenmore's ballfield development proposal, and he knows I have been crafting my own comments to submit to your agency. He wanted to make a comment as well. The below statement comes directly from him, verbatim, with no suggestions from me (other than to use respectful words).

Thank you for taking the time to read his comment.

Dear Ms. Logan,

Nature has its borders, but it also should be in places. And I feel like over the past years, we've really been making an environmental impact. All the forests are getting cut down either for space, firewood, or to make paper. And I just want that to stop. As for the wetlands, a club wants to build a set of fields for games and it goes into 90% of the buffer. And I want that to stop, too. It is having a huge environmental impact, and it could destroy a lot of life on earth. I like the meadow, and I would be sad if it were gone.

Kenmore resident
Age 7

From:
To: [Logan, Jessica \(PARKS\)](#)
Subject: Saint Edward Ball Field
Date: Thursday, August 22, 2019 1:26:25 PM
Attachments: [image.png](#)

To Whom it May Concern,

I am writing in regards to the proposal from the City of Kenmore to lease and renovate the existing ball field at Saint Edward State Park. My name is Racheal Wiggins and I am resident of Seattle. However, I am beginning my third year teaching Forest School programs and Summer Day Camps for Camp Roots in Saint Edward's. Over the past two years I have spent Monday-Friday in the park, roughly 5 to 12 hours a day, with children from ages 5-15 years old, observing and documenting the natural, seasonal changes of the plants and wildlife that call Saint Edward Park home. I have observed and experienced the ball field as *is* in snow, rain, wind, sleet, sun and smoke. This field is not just a ball field, it is so much more.

At Camp Roots we believe and teach that we are to be stewards of the land. We are in constant conversation about the impact we have on natural spaces, specifically Saint Edward's, as that is our classroom and home to a great deal of wildlife. We discuss how important it is to be mindful of where we walk, being cautious to notice small plants and insects, fragile ecosystems hidden beneath our feet or a small creatures home camouflaged in plain sight. We treat all living things with respect, even down to the tiniest of [copepods](#) (of which the field has many!). Our days are spent slowing down and getting up close and personal with all aspects of nature. Children have an ability to spot the most minuscule of things, allowing us to teach them firsthand the importance and process of life and development in our forest. That being said, I have observed a surprising amount of life in the ball field at Saint Edward due to the extensive time I've spent with the keen eye of children.

I have compiled and included excerpts from some of our observations specific to the field over the past year and a half. I have hundreds (not an exaggeration) of hours documented, so I have only included to give a small glimpse into the varied ways we use the ball field. We study all areas of the park (the forest, the lake, etc.), but the field has provided us with a unique learning opportunity. I have hundreds (again, not an exaggeration) of photos of the many ways we have used the ball field over the course of the past two years, but have only included a dozen or so.

I am not against ball fields in Kenmore, but I am against the idea that a ball field would improve the quality of life for the wildlife or park goers. And I am against a modernized ball field being put into a natural space, when there are a number of schools and churches and developed lands that could and should be used as an alternative. Saint Edward's is a unique place, even among all of many beautiful green spaces in the Seattle area. Daniels Real Estate has spent millions of dollars to maintain the historical look of the seminary building and have done an excellent job so far. It is confusing to me why it would be so important to have such painstaking and costly work done if only to put in a turf ball field, harsh lighting and pavement in

place of a beautiful field that offers a variety of usages *as is*.

There are so many reasons that changing the field would be a bad idea, that I am surprised such a drastic proposal is even being considered. I hope that those who are considering the pros and cons can objectively look at the extreme impact changing the ball field would have on the abundance of life that calls it home, as well as the appeal of the state park, our program, and all the other park goers that find respite from the fast paced, man-made, modernized world that we already have so much of.

Documentation excerpts from weekly emails to parents from January 2018 to May 2019:

Wednesday 1/16/2018

We explored the pond that runs along the far edge of the field, and found all sorts of unexpected life! Tiny insects sat on and flew above the water, red [copepods](#) (tiny crustaceans) rested on submerged leaves, [caddisfly larvae](#) hid inside their hodgepodge homes of sand and plant matter, a caterpillar lay near the bottom of the pond, and a jelly that looked like eggs undulated in the slight current.

Thursday, 3/8/2018

We have been observing two areas for our Pond Study: the wetland area below Forest Camp (which we call "the swamp") and the long, skinny "pond" at the far edge of the field ("the ditch"). A lot has happened since our last class visit! We found many new grasses and plants growing up in both areas, including young skunk cabbage in the swamp. Both areas held many tiny, red copepods (small crustaceans) on leaf litter and other debris in the shallow water, and we found a few mosquito and other insect larvae. We also found pond snails on leaves in the ditch! The kids found that one area of the swamp was entirely filled with red-orange algae, which wasn't there in our last pond study. And at the end of the week, we found salamander eggs in the ditch! We're excited to see what happens as we move into spring!

Friday, 3/16/2018

On our hike, we found Douglas squirrel and duck tracks, before we were drawn by the sound of frogs from the ditch-pond. We found frog eggs and salamander larvae, which we hadn't seen during our recent pond study, and then managed to catch a frog! It's a Pacific Chorus frog, aka [Pacific treefrog](#) (our state amphibian). You can identify it by the black stripe running from snout to shoulder.

Tuesday, 10/2/2018

This was our first windy day of the school year. As a precaution, we avoided our normal forest space since it hadn't been windy in some time, the first wind is when a lot of the loose or dying branches will fall. The children did not mind at all, and we began our day in the field. We said good morning, read a book and then we had a blackberry picking party. The children were very excited to see there are still edible blackberries on some of the plants. As we made our way around the edges of the field to find blackberries, some of the children noticed a lot of garbage on the ground. Upon declaring it "an absolute mess" they decided they could help clean up, so we got the children work gloves and a couple of plastic bags and they diligently

went to work cleaning up the field. They did an outstanding job and filled an entire plastic bag with garbage!

After lunch some of the children used rakes they found discarded along the side of the field to create a "pterodactyl nest." As a handful of them used rakes, others joined in the plans of this wonderful creation. Without any guidance from the teachers, the children practiced teamwork, used their imaginations, and were both kind and mindful while creating the nest.

Wednesday, 11/14/18

Wednesday morning we noticed that the wind was blowing the Cottonwood leaves from their trees along the edge of the field, and we just had to try to catch them! It was a surprising challenge, as the wind and the shape of the leaves caused them to twist and flip unpredictably in all directions.

Wednesday, 3/21/19

What a gift it has been to share the wonder of changing seasons in the same fields and forests all year round. After our intense cold we were surprised to have such a huge wave of warmth and sunshine. The abundance of life and growth that's come along with this change is impossible to miss.

The ditch along the far side of the field has sounds of frogs and eggs of both frogs and salamanders! How do we tell the two apart? Maybe your child will remember. **Frog egg** masses do not have the protective outer gelatinous layer. **Salamander egg** masses have a second, outer, layer of jelly.

Friday, 3/23/19

At one point in the morning, we were lucky enough to see 5 deer walk into the field! The kids walked slowly and silently closer, and were able to watch the deer eat for several minutes before they moved on to another part of the park. We even saw one of the deer give a big sneeze! We reminded the children that deer are wild animals, and it isn't safe to try to feed them or touch them (as much as they wanted to).

Monday, 4/15/19

About two and a half months ago our Monday class collected Cottonwood buds from fallen branches. They were put in a jar with olive oil, which sat and steeped. On Monday we strained the oil, melted beeswax using the Kelly Kettle, and then combined the beeswax and infused oil. After allowing it to sit for about an hour we had our very first forest-made salve! Cottonwood salve is often called "Balm of Gilead" and has/can be used to soothe skin irritations such as eczema, cuts, rashes, burns, psoriasis, insect bites and stings, sunburn, athlete's foot, dry and scaly skin, chapped hands or cheeks, and is even said to prevent or heal diaper rash! It was a great accomplishment and we were all very excited to see the finished product.

Wednesday 5/1/19

We started our May focus on seed-producing plants, by learning a new yoga poem and searching for seeding and flowering plants. They weren't hard to find, with seeded dandelions covering the field! We also looked closely at the grass for tiny flowers growing there.

Friday, 5/3/19

We arrived to find that half of the long grass in the field had been cut! While we had enjoyed hiding in and wading through the long grass, the grass clippings left in the field brought even more fun. The children spent the morning collecting grass, then burying each other and re-emerging as green-tinged zombies.

Friday, 5/24/19

Friday began with the children tossing off backpacks and running immediately across the field to the ditch full of tadpoles. Mr. S told the children he'd never seen a salamander in real life and they took that as an instant challenge. Before long they had collected multiple tadpoles that were clearly metamorphosing into salamanders. With glee the children exclaimed "baby dragon!" when they noted the front leg buds on the tadpoles, knowing this indicates salamanders developing, not frogs. You can tell the difference between the tadpoles that are developing into salamanders because the front leg buds are clearly seen and visible throughout the development. Frogs front legs are concealed and hidden until metamorphosis.

PHOTOGRAPHS that show varied uses, experiences and life in the ball field:



In the ditch along the field, there are both salamander and frog eggs. Being able to observe the eggs side by side, the children quickly learn how to distinguish the eggs from each other and can monitor and document the differences between the metamorphosis of both amphibians.



A natural grazing space for many deer, the field is a place where the wildlife can be safely observed, while also being an incredible experience for the children to observe wildlife in it's natural habitat.



Tadpole! One of many that try to survive spring and grow into a salamander.



Practicing documentation skills in real time, stopping, looking, feeling, smelling, touching and then transcribing that experience into a notebook to reference.



Observing and studying ice!



Performing for each other and the birds in the field.



Feeling the crunch of ice and the mush of the mud beneath, giving a hands on learning experience that cannot be taught indoors.



Observing the salamander and frog eggs



Discussing seed producing plants among seed producing plants.



A Junco nest with eggs on fields edge



Observing a crow fledging



Socializing over picnic lunch with autonomy and independence in a natural space.



Varied stages of Black Cottonwood seed development from the Black Cottonwood trees along the wetland buffer.

I started this email thinking I needed to be concise, but that simply isn't the case. The Saint Edward ball field is vast and so are the reasons why it shouldn't be developed. I could double the length of this email with more reasons why, but I will leave you with this - the amazon is burning, our green space is diminishing by the minute, please do not add this special land to the list of developed and desecrated.

--



People for an Environmentally Responsible Kenmore

5934 NE 201st St.
Kenmore, WA
98028

Date: August 30, 2019

To: Jessica Logan, Environmental Program Manager
jessica.logan@parks.wa.gov
Washington State Park & Recreation
1111 Israel Rd. S.W.
Olympia, WA 98504

Subject: Saint Edward State Park Ballfields-SEPA Scoping Comments

From: People for an Environmentally Responsible Kenmore (perkinkenmore.org)
c/o Elizabeth Mooney
elizabeth.mooney@comcast.net
5934 NE 201st St.
Kenmore, WA 98028

Re: In support of maintaining a natural surface at the St. Edwards Park ball field.

The proposed development of the existing field at St. Edwards Park presents a number of concerns for the public and the environment. The replacement of a natural grass field with artificial turf will likely have a number of significant adverse environmental impacts on the local environment and potentially the children and adults playing on the field. The field is part of the headwaters of a local stream (WRIA 08.0226) and adjoins wetlands that influence stream flow and water quality (Attachment 1,2,3). The lowest reaches of Stream WRIA 08.0226 have been designated as fish bearing (Attachment 2); in addition, the stream flows into Lake Washington (WRIA) which contains Federally listed Chinook salmon and steelhead.

The attached annotated bibliography (C. Davis) of artificial turf field studies provides a number of references from peer-reviewed studies and government reports providing evidence for the potential harm to both people and the environment. The bibliography identifies three general areas of impact: Heat, Health, and Environment. The City has proposed a number of measures to monitor and mitigate effects to the environment; these have focused on storm water and monitoring water pH, temperature, and turbidity. Studies on artificial turf, however, suggest that organic compounds and metals are likely products from the degradation of the artificial field surface. At present, it has been suggested that the underlying substrate for the fields will not be recycled tires, but possibly an alternative, coconut husks. Regardless, no monitoring of these contaminants has been proposed. More importantly, while contaminants may be prevented from entering the watershed with extensive filtering, the potential for exposure to the children utilizing the field is not addressed.

We believe that, to be complete, an Environmental Impact Statement should contain a full analysis of:

1. Potential effects to people
 - a. Increased exposure to heat by athletes playing on artificial turf (see studies (see bibliography: Heat, studies 1-9).
 - b. Increased probability of sports injury on artificial vs. natural field (see bibliography: Health, studies 2,4, 22-24).
 - c. Increased risk of infection due to bacteria on turf substrate (see bibliography: Health, studies 5, 15, 20, 21).
 - d. Increased risk of contact with contaminants from the artificial turf (note that this is different from tire-origin contaminants), such as lead and chromium (see bibliography: Health, studies 8, 9, 10, 11, 27).
2. Potential effects on the environment
 - a. Leachate from artificial turf field has been found to contain a number of metal and organic compounds, while the primary source of these has generally been recycled tires, it appears that the artificial turf fibers also contribute to contaminants released from the field. (see Environment, studies 9).
 - b. The potential for contaminants from the field to reach the wetland, stream, and lake needs to be evaluated.
 - c. Investigate the likely contaminants on terrestrial and aquatic flora and fauna.
 - d. What is the necessary drainage infrastructure necessary to contain/treat the leachate, especially in regard to major Autumn/Winter rain events.
 - e. Environmental effects of artificial turf maintenance. Chemicals such as algaecides or disinfectants are often used to keep the surface clean – how are these chemicals prevented from entering surface or ground water.
 - f. What effects do chemicals and algaecides used in cleaning have on the environment when released into the environment.

Alternative concepts for “improvement” of the St. Edward Park ballfield redevelopment could include a multiuse “Center” near the grassy field, serving a diverse population of park visitors and their interests. Programs could be co-created with a concern for best available science, in keeping with fostering environmentally responsible actions and human health. The goal of an alternative concept for the ballfield should lead to longterm sustainable grass-based sports as well as nature-based experiences in St. Edward State Park and in the waters at its shoreline in Lake Washington.

Summary of Research

Assessing the Impacts of Artificial Turf

Annotated Bibliography – Dr. Christi Davis for SHFPC

Updated 12/15/2016

Heat: Research has documented that the surface temperature on artificial turf is dramatically higher than the surrounding land uses including asphalt. Concerns regarding the excessive temperatures range from the implications for players who are already exerting themselves to the implications for burns when players or pedestrians come into contact with the hot surfaces.

1. Petrass, L. A., et al. (2014). Comparison of surface temperatures of different synthetic turf systems and natural grass: Have advances in synthetic turf technology made a difference. *Proceedings of the Institution of Mechanical Engineers, Part P: Journal of Sports Engineering and Technology*.
 - a. A comparison of surface temperatures of third-generation synthetic turf with a cool climate product that claims to reduce surface temperatures to surface temperatures of natural grass.
 - b. Although surface temperatures were lower for the cool climate field compared to other synthetic turf, both types of artificial turf fields were considerably hotter than natural grass with temperatures that were between 12° C (53° F) and 22° C (72° F) hotter.
2. Reasor, E. H. (2014). Synthetic Turf Surface Temperature Reduction and Performance Characteristics as Affected by Calcined Clay Modified Infill. Master's Thesis, University of Tennessee.
Available at: http://trace.tennessee.edu/utk_gradthes/2750
 - a. Surface temperatures of artificial turf were between 31° C (88° F) and 57° C (135° F).
 - b. Although irrigation reduced surface temperatures of artificial turf, increases of 74 to 102% of the pre-irrigation temperature were observed within 30 minutes after irrigation.
 - c. Surface temperatures returned to pre-irrigation temperature on all of the treatments between 60 and 120 minutes after irrigation. Therefore, the cooling effect of irrigation will not last the entire length of an athletic competition.
3. Thoms, A. W. et al. (2014). Models for Predicting Surface Temperatures on Synthetic Turf Playing Surfaces. *Procedia Engineering*, 72, 895-900. Available at:
<http://www.sciencedirect.com/science/article/pii/S1877705814006699>
 - a. Artificial turf surface temperatures ranged from -9.8 to 86.4° C (14 to 188° F) to when ambient air temperatures ranged from -0.4 to 37.1° C (31 to 99° F).
 - b. Absorption of solar radiation results in increased temperatures on artificial turf surfaces, and high rates of solar radiation are absorbed with minimal light reflectance. Therefore, air temperature in conjunction with solar radiation explained most of the variation in artificial turf surface temperatures.
4. Penn State's Center for Sports Surface Research (2012). Synthetic Turf Heat Evaluation- Progress Report. January 2012. Available at:
<http://plantscience.psu.edu/research/centers/ssrc/documents/heat-progressreport.pdf>
 - a. This study measured surface temperatures of artificial turf fields between 140.2 and 173.4° F when air temperatures were between 73 and 79° F.
 - b. Looking at various color options for infill and temperature, no product significantly reduced surface temperatures. Small reductions in temperature are insignificant when surface

temperatures still exceed 150° F. This study concluded that “[w]hile marketing materials may claim lower surface temperatures, no scientific reports exist that substantiate such claims.”
c. Research has not found a good solution for excessive heat levels of turf.

5. Serensits, T. J. et al. (2011). Human health issues on synthetic turf in the USA. *Proceedings of the Institution of Mechanical Engineers, Part P: Journal of Sports Engineering and Technology*, 225(3), 139-146.

- a. High surface temperatures found on artificial turf fields can contribute to physiological stress and cause “serious heat-related illnesses” including heat stress, heat stroke, and burns.
- b. The “New York City Department of Health and Mental Hygiene recognizes excessive surface temperatures as the most important health concern associated with infilled synthetic turf.”
- c. Irrigation of excessively hot artificial turf surfaces only provides cooling benefits for about 20 minutes, with a rebound to within 10 degrees of the pre-irrigation temperature within 3 hours.
- d. The use of white crumb rubber as the infill does not resolve the heat issue.

6. Sciacca, T (2008). The Thermal Physics of Artificial Turf. SynTurf.org. Available at:

<http://www.synturf.org/sciaccaheatstudy.html>

- a. A study comparing temperatures on artificial turf temperatures with air temperature found that artificial turf ranged from 58 to 75° hotter than measured air temperature.

7. SportsTurf Managers Association (STMA) (2008). A Guide to Synthetic and Natural Turfgrass for Sports Fields: Selection, Construction and Maintenance Considerations. 2nd edition. Available at:

http://www.stma.org/sites/stma/files/STMA_Synthetic_Guide_2nd_Edition.pdf

- a. Artificial turf gets dramatically hotter than surrounding land uses including asphalt with surface temperatures as much as 95 to 140° F hotter than natural grass fields whereas the temperature of natural grass rarely rises above 85° F, regardless of air temperature

8. Williams, C. F., & Pulley, G. E. (2002). Synthetic surface heat studies. *Brigham Young University*. Available at:

www.wellesley.ma.gov/pages/WellesleyMA_SpragueResources/Synthetic%20Surfaces%20Heat%20Study.doc

- a. Temperature measurements were taken at the surface, above the surface, and below the surface of artificial turf, natural turf, bare soil, asphalt, and concrete.
- b. Surface temperatures of synthetic turf were 37° F higher than asphalt and 86.5° F hotter than natural turf.
- c. Two inches below the surface, synthetic turf was 28.5° F hotter than natural turf.
- d. Although irrigation of synthetic turf resulted in a reduction of close to 90°F, temperatures rose 35° within five minutes and returned to the starting temperature within 20 minutes.
- e. “The hottest surface temperature recorded was 200° F on a 98° F day. Even in October the surface temperature reached 112.4° F.”
- f. Brigham Young University has set a surface temperature guideline which restricts play on synthetic turf fields when surface temperatures are potentially hazardous to athletes. This reduces the playing season and eliminates any continuous play benefit that is typically mentioned in favor of artificial turf.

9. Beard, J. B., & Green, R. L. (1994). The role of turf grasses in environmental protection and their benefits to humans. *Journal of Environmental Quality*, 23(3), 452-460. Available at:

<https://www.landcarenetwork.org/legislative/TheRoleofTurfgrassesinEnvironmentalProtection.pdf>

- a. Synthetic surfaces can be up to 39° C (102° F) hotter than natural turf. Natural turf grass provides a natural cooling affect and helps to dissipate heat from neighboring developed areas.

Health: The impacts of inhalation or ingestion of chemicals continues to be a concern for those playing on artificial turf. Direct human exposure to the hazardous substances contained in the rubber in-fill of artificial turf is believed to occur via inhalation, skin contact, and/or ingestion. Furthermore, there are concerns for increased injuries and bacterial infections when playing on artificial turf.

1. Kim, S., Yang, J.-Y., Kim, H.-H., Yeo, I.-Y., Shin, D.-C., & Lim, Y.-W. (2012). Health Risk Assessment of Lead Ingestion Exposure by Particle Sizes in Crumb Rubber on Artificial Turf Considering Bioavailability. *Environmental Health and Toxicology*, 27, e2012005. <http://doi.org/10.5620/eht.2012.27.e2012005>.

- a. Researchers considered the risks for lead exposure from children ingesting rubber powder resulting from exposure to crumb rubber infill artificial turf and found that elementary school students had a hazard index that exceeded 0.1, a level that is considered a “potential for hazard”, with middle and high school students also suffering exposure levels.

2. Balazs, G. C., et al. (2014). Risk of Anterior Cruciate Ligament Injury in Athletes on Synthetic Playing Surfaces A Systematic Review. *The American journal of sports medicine*, 0363546514545864.

- a. A systematic review of available literature on the risk of ACL rupture on natural grass versus artificial turf found that there is an increased rate of ACL injury on synthetic playing surfaces for football players.

3. Celeiro, M., Lamas, J. P., Garcia-Jares, C., Dagnac, T., Ramos, L., & Llompарт, M. (2014). Investigation of PAH and other hazardous contaminant occurrence in recycled tyre rubber surfaces. Case-study: restaurant playground in an indoor shopping centre. *International Journal of Environmental Analytical Chemistry*, 94(12), 1264-1271.

- a. The presence of a large number of hazardous substances were found in both the runoff and vapor phase of recycled tire playground surfaces.
- b. Nine polycyclic aromatic hydrocarbons (PAHs) were detected in the runoff/ cleaning water with total PAH concentrations in the ppm (parts per million) range.
- c. The most toxic PAH, benzo[a]pyrene was detected in extracts from playground surfaces.
- d. “The presence and the high concentration of these chemical compounds in playground should be a matter of concern owing to their high toxicity.”

4. Laible, C., & Sherman, O. H. (2014). Risk Factors and Prevention Strategies of Non-Contact Anterior Cruciate Ligament Injuries. *Bulletin of the Hospital for Joint Diseases*, 72(1), 70-5. Available at: http://www.nyuhjdbulletin.org/mod/bulletin/v72n1/docs/v72n1_7.pdf

- a. Since shoe-surface interaction is important for injury prevention, “the optimal surface to prevent injury is outdoors on natural grass.”
- b. Artificial turf has a higher friction coefficient and greater ground reaction force, both conditions that increase the risk for injury.
- c. Furthermore, as temperature increases the shoe-surface friction interaction increases and exposes athletes to greater risk of injury.

5. Bass, J. J., & Hintze, D. W. (2013). Determination of Microbial Populations in a Synthetic Turf System. *Skyline-The Big Sky Undergraduate Journal*, 1(1), 1. Available at:
<http://skyline.bigskyconf.com/cgi/viewcontent.cgi?article=1000&context=journal>
 - a. Abrasions, even insignificant ones, from artificial turf can create an entry site for pathogens.
 - b. The higher abrasion rate for synthetic turf increases the risk of infection, and the microbial populations found within synthetic turf are a source of pathogens when abrasions occur.
 - b. Older turf fields have higher microbial populations, as well as higher levels in the higher traffic areas such as the sidelines. These results indicate that artificial turf poses a greater risk for the spread of pathogens and infections among student athletes.
6. Llompart, M., Sanchez-Prado, L., Lamas, J. P., Garcia-Jares, C., Roca, E., & Dagnac, T. (2013). Hazardous organic chemicals in rubber recycled tire playgrounds and pavers. *Chemosphere*, 90(2), 423-431. Available at: http://www.elcorreodelsol.com/sites/default/files/chemosphere_maria_llompart.pdf
 - a. An analysis of surfaces containing recycled rubber tires confirmed the presence of hazardous substances including PAHs, phthalates, antioxidants (e.g. BHT, phenols), benzothiazole, derivatives, and other chemicals.
 - b. The vapor phase above the samples confirmed volatilization of many organic compounds demonstrating that these chemicals can enter the human body through inhalation.
 - c. The use of recycled rubber tires for play areas, especially facilities for children, should be restricted or prohibited.
7. Serensits, T. J., McNitt, A. S., & Petrunak, D. M. (2011). Human health issues on synthetic turf in the USA. *Proceedings of the Institution of Mechanical Engineers, Part P: Journal of Sports Engineering and Technology*, 225(3), 139-146.
 - a. Synthetic turf is more abrasive than natural turf grass, therefore, "breaks in the skin are more common, creating a pathway for infection when in contact with an infected surface."
8. Shalat, S.L. (2011). An Evaluation of Potential Exposures to Lead and Other Metals as the Result of Aerosolized Particulate Matter from Artificial Turf Playing Fields, Final Report. Submitted to NJ Department of Environmental Protection, July 14, 2011. Available at:
<http://www.nj.gov/dep/dsr/publications/artificialturf-report.pdf>
 - a. In air samples collected from artificial turf during various levels of activity, researchers detected arsenic, cadmium, chromium and lead, all metals with known human toxicity.
 - b. This research demonstrates that activity by players on the fields could suspend contaminated particulates into the air that could be inhaled and therefore, human exposure from artificial turf fields is not limited to dermal.
 - c. These results "raise some concerns with regard to the potential hazards that may exist for individuals and in particular children who engage in sports activities on artificial turf fields."
9. Van Ulirsch, G. et al. (2010). Evaluating and regulating lead in synthetic turf. *Environmental health perspectives*, 118(10), 1345. Available at:
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2957910/pdf/ehp-118-1345.pdf>
 - a. Artificial turf can degrade to form lead containing dust at levels that pose a health risk to children.
 - b. Due to the lack of research, "...physicians should be aware of synthetic turf as one potential source of exposure for young children..." and "Health officials investigating elevated blood lead in children should also be aware of synthetic turf as a potential source of lead exposure."

10. Center for Disease Control and Prevention. (2008). CDC Health Advisory. Potential exposures to lead in artificial turf: Public health issues, actions, and recommendations. June 18, 2008. Available at:

http://www.dhhr.wv.gov/oeps/disease/Documents/Advisory_00275.pdf

- a. Artificial turf made of nylon or nylon/ polyethylene blend fibers contain lead and pose a potential public health concern.
- b. The risk for lead exposure is higher for artificial fields that are old, frequently used, exposed to the weather, or demonstrate signs of abraded, faded, or broken fibers. As turf ages, lead is released in dust that could then be ingested or inhaled.
- c. CDC does not know how much lead the body will absorb. However, lead can cause neurological development symptoms and behavioral problems. Children less than 6 years old are more affected by lead than adults and absorb lead more easily.
- d. CDC does not understand the potential risks associated with lead exposure from artificial turf but recommends precautions including aggressive hand and body washing after playing on fields, washing clothes immediately to avoid tracking contaminated dust to other places, and discouraging eating and drinking while on turf products.

11. Han, I. K., Zhang, L., & Crain, W. (2008). Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids. *Journal of Exposure Science and Environmental Epidemiology*, 18(6), 600-607. Available at: <http://www.nature.com/jes/journal/v18/n6/pdf/jes200855a.pdf>

- a. Samples from rubber granules and from artificial grass fibers were taken at fields of different ages and analyzed for polycyclic aromatic hydrocarbons (PAHs), zinc, chromium, arsenic, cadmium, and lead. These samples were then analyzed to determine their bioaccessibility in synthetic digestive fluids.
- b. The rubber granules found in artificial turf fields had PAH levels above health-based soil standards. Although levels appear to decline over time, this trend can be altered by the fact that new rubber can be added periodically to compensate for the loss of infill material.
- c. There was a "slightly worrisome" level of chromium found in artificial turf fiber samples.
- d. Lead in artificial fields can come from the blades of artificial grass, the pigment used for the field markings and lines, and the infill material. Although there were relatively low concentrations of lead measured, the researchers were careful to point out: "some health scientists believe that any Pb [lead] is harmful to children's neurocognitive development, and that no new Pb should be added to their surroundings." Furthermore, the lead present in the rubber granules, while at low levels, was "highly bioaccessible" to synthetic gastric fluid.

12. Brown, D.R. (2007). Artificial Turf: Exposures to Ground-up Rubber Tires. Environment & Human Health, Inc. (EHHI). Available at: http://www.ehhi.org/reports/turf/turf_report07.pdf

- a. Direct human exposure to the hazardous substances contained in artificial turf occurs via three pathways: inhalation as chemicals off gas from the turf, skin contact, or ingestion including by children or infants who come into contact with the material. In the case of allergies (i.e. latex allergies), inhalation could result in a systemic response, as opposed to a contact response.
- b. Extreme temperatures or solvents are not needed to release metals (including zinc, selenium, lead and cadmium), volatile organic compounds, or semi-volatile organic compounds from the rubber infill of artificial turf into the air or water – release takes place in ambient air and water temperatures.

c. While, "the status of the information about human exposures to recycled tire crumb rubber in-fill ... is not sufficient to determine the safety of the use of the product in situations that involve continuous episodes of human exposure;" "the available information is sufficient and strong enough to raise plausible questions with respect to acute toxicity for susceptible persons, and for cancer risks."

13. California Office of Environmental Health Hazard Assessment (OEHHA) (2007). Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products. Report prepared for the Integrated Waste Management Board. Available at:

<http://www.calrecycle.ca.gov/publications/Documents/Tires%5C62206013.pdf>

- a. Based on a review of 46 studies, 49 chemicals that are released from tire crumb were identified.
- b. Of the 49 chemicals identified, "seven of the chemicals leached from tire shreds were carcinogens."
- c. OEHHA calculated a cancer risk of 1.2 in 10 million based on a one-time ingestion of the tire crumb rubber over a lifetime.
- d. Chrysene, a PAH and carcinogen, was found to be ingested as the result of hand-to-surface-to mouth transfer from playground surfaces made with recycled tires. Assuming playground use for an 11 year period (from age 1 to 12) there was found to be an increased cancer risk of 2.9 in one million from the general cancer risk gauge of one in one million
- e. Only 31% of the playground surfaces made of recycled tires tested passed the California State mandated Head Impact Criterion (HIC) of <1,000. In this same study 100% of the playground surfaces made of wood chips passed the same standard.

14. Crain, W. and Zhang, J. (2007). Rachel's Democracy and Health News #992: Hazardous Chemicals in Synthetic Turf, Follow-up Analyses, April 12, 2007. Available at:

http://www.precaution.org/lib/07/prn_synthetic_turf.070405.htm

- a. Testing on two sites in New York where synthetic turf has been used (the large, 3 year old, Parade Ground in Brooklyn; the relatively small 5 month old Sara D. Roosevelt Park in Manhattan) found PAHs at hazardous levels (as per New York standards). Dibenzo (a,h)anthracene, a probable human carcinogen, was also found at hazardous levels, with two other PAH forms, both possible human carcinogens, found at hazardous levels at the Parade Ground site.
- b. Research into the pathways by which these substances may be absorbed into the bodies of children and athletes via skin contact, ingestion or other pathways, is very limited with additional research needed.

15. Epstein, V. (2007). Texas Football Succumbs to Virulent Staph Infection from Turf. Bloomberg Press, December 21, 2007. Available at:

<http://www.bloomberg.com/apps/news?pid=newsarchive&sid=alxhRJNn.cdc>

- a. Artificial turf is linked with serious and potentially life threatening staph infections including MRSA (methicillin-resistant staphylococcus aureus). MRSA can exploit minor skin injuries such as turf burn, and therefore, MRSA infection rate among players is 16 times higher than the national average.

16. KEMI, Swedish Chemicals Agency (2007). Facts: Synthetic Turf. April 2007. Available:

<http://www2.kemi.se/upload/trycksaker/pdf/faktablad/fbsyntheticturf.pdf>.

- a. Tires contain up to 60 different substances which may be bioaccumulative, carcinogenic, reprotoxic, mutagenic and/or endocrine disrupting.
- b. Most PAHs are persistent, bioaccumulative and carcinogenic.
- c. Among the metals found in tires that may be of concern are zinc, lead, copper, chromium and cadmium. Zinc and copper are harmful when absorbed at high levels. Lead can affect reproduction and development of the nervous system leading to poor cognitive development. Chromium is carcinogenic and mutagenic. Cadmium is toxic to humans and can contribute to poor liver and kidney function, as well as osteoporosis.

17. Mattina, M. I., Isleyen, M., Berger, W., & Ozdemir, S. (2007). Examination of crumb rubber produced from recycled tires. *The Connecticut Agricultural Experiment Station, New Haven, CT*. Available at: http://www.ct.gov/caes/lib/caes/documents/publications/fact_sheets/examinationofcrumbubberac005.pdf

- a. Multiple compounds out-gas and leached into water from synthetic turf rubber crumb under ambient temperatures including benzothiazole (a skin and eye irritant), butylated hydroxyanisole (a "recognized carcinogen, suspected endocrine toxicant, gastrointestinal toxicant, immune toxicant, neurotoxicant, skin and sense-organ toxicant"), n-hexadecane (a severe irritant), and 4-(t-octyl) phenol ("corrosive and destructive to mucous membranes").

18. Anderson, M. E. et al. (2006). A case study of tire crumb use on playgrounds: risk analysis and communication when major clinical knowledge gaps exist. *Environmental health perspectives*, 114(1), 1. Available at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1332647/pdf/ehp0114-000001.pdf>

- a. A Case Study conducted by a group of physicians and public health professionals working with the U.S. Environmental Protection Agency's Region Pediatric Environmental Health Specialty Unit found that the research and information necessary is not available to establish "the safety in use with children" of tire crumb used as playground surfaces.
- b. "The use of recycled tire crumb products on playgrounds has had little health investigation. The major unresolved concern is the potential for latex allergy with short-term dermal exposure."

19. Crain, W. and Zhang, J. (2006). Rachel's Democracy and Health News #871: Hazard Chemicals in Synthetic Turf. September 7, 2006. Available at: http://www.precaution.org/lib/06/prn_toxins_in_synthetic_turf.060831.htm

- a. Analyses conducted at the Environmental and Occupational Health Sciences Institute of Rutgers University found the crumb rubber from artificial turf to contain high levels of PAHs, as well as zinc and arsenic.
- b. PAHs found to be contained in the crumb rubber "were above the concentration levels that the New York State Department of Environmental Conservation (DEC) considers sufficiently hazardous to public health to require their removal from contaminated soil sites. It is highly likely that all six PAHs are carcinogenic to humans."
- c. "The analyses also revealed levels of zinc in both samples that exceed the DEC's tolerable levels."
- d. The researchers associated with these findings were careful to state "We want to emphasize that the findings are preliminary. PAHs in rubber might not act the same way as in soil, and we do not yet have information on the ease with which the PAHs in these rubber particles might be absorbed by children or adults -- by ingestion, inhalation, or absorption through the skin.

However, the findings are worrisome. Until more is known, it wouldn't be prudent to install the synthetic turf in any more parks."

20. Kazakova, S. V. et al. (2005). A clone of methicillin-resistant *Staphylococcus aureus* among professional football players. *New England Journal of Medicine*, 352(5), 468-475. Available at: <http://www.nejm.org/doi/pdf/10.1056/NEJMoa042859>

- a. In a study of professional football players from the St. Louis Rams team, all MRSA infections developed at sites of turf burns.
- b. Players reported a higher frequency of abrasions when playing on artificial turf compared to natural grass.

21. Begier, E. M. et al. (2004). A high-morbidity outbreak of methicillin-resistant *Staphylococcus aureus* among players on a college football team, facilitated by cosmetic body shaving and turf burns. *Clinical infectious diseases*, 39(10), 1446-1453. (a study conducted for the Connecticut Department of Public Health, Student Health Services of Sacred Heart Univ, Centers for Disease Control and Prevention, Minnesota Department of Public Health, and the Los Angeles County Department of Health Services).

- a. In a study of MRSA outbreaks involving college football players, infection was associated with turf burns from artificial grass. Turf burns increased the risk of infection regardless of the type and timing of care provided the burn. Turf burns may be facilitating infection by acting as a pathway for infection.

22. Shorten, M. R., & Himmelsbach, J. A. (2003). Sports surfaces and the risk of traumatic brain injury. Sports surfaces. University of Calgary, Calgary, 49-69. Available at:

<http://biomechanica.com/docs/publications/docs/Shorten%20-%20Head%20Injury%20Risk.pdf>

- a. There is double the risk of head traumas such as concussions associated with artificial turf compared to natural turf, and artificial turf presents a 5 times greater risk of more severe head injury.
- b. Concussions (formally described as Mild Traumatic Brain Injury or MTBI) resulting from sports has, according to the US Centers for Disease Control, reached "epidemic proportions," and these 'mild' head traumas, especially a series of concussions, can have long term, negative effects on cognitive function.

23. Naunheim, R., et al. (2002). Does the use of artificial turf contribute to head injuries?. *Journal of Trauma-Injury, Infection, and Critical Care*, 53(4), 691-694.

- a. The impact-attenuating properties of two artificial fields were compared to a grass outdoor practice field. Both artificial surfaces were harder compared to the outdoor grass field. It was concluded that the low impact attenuation of the artificial turf may be contributing to the high incidence of concussion.

24. Guskiewicz, K. M., et al. (2000). Epidemiology of concussion in collegiate and high school football players. *The American Journal of Sports Medicine*, 28(5), 643-650.

- a. In a survey of both high school and collegiate certified athletic trainers representing over 17,000 football players, contact with artificial turf was associated with more serious concussion than contact with natural grass.

The true impact of chemical exposure could take decades to be measured.

25. EPA: Supplementary Guidance for Conducting Health Risk Assessment of Chemical Mixtures, 2000

http://ofmpub.epa.gov/eims/eimscomm.getfile?p_download_id=4486

EPA Risk Assessment Forum Technical Panel. (2000). Supplementary Guidance for Conducting Health Risk Assessment of Chemical Mixtures. Washington DC: U.S. Environmental Protection Agency.

The guidelines define a complex mixture thus: "A mixture containing so many components that any estimation of its toxicity based on its components' toxicities contains too much uncertainty and error to be useful. Risk assessments of complex mixtures are preferably based on toxicity and exposure data on the complete mixture..." Appendix B p.2

Thus far, risk assessments on crumb rubber, a complex chemical mixture, have not been done in a manner consistent with these guidelines.

Since toxicity data on crumb rubber is not available, component-based methods have been used to estimate risk. While the findings of these assessments have been reported, the reality that the data quality was too poor to justify a quantitative risk assessment has not been reported.

The risk assessments have been based on only about **half of the identified compounds** contained in crumb rubber because there is no governmental toxicity testing on the other half. The information on the other half of the chemicals is often limited. Therefore, risk assessments have included data extrapolated from animal studies to human health effects, assumed that two related chemicals have identical toxicities, used toxicities for which there is at least 100-fold degree of uncertainty, and used oral and dermal exposure data to predict inhalation toxicity. The risk assessments have assumed that there are no interaction effects between the dozens of chemicals that are off-gassed from crumb rubber.

There are also problems with the exposure estimates. Many of the measurement were taken using stationary monitors, often located away from active play. This is problematic because players on a field constantly disturb the infill, re-suspending dust (PM 2.5, PM 10, carbon black) and potentially changing the levels of VOCs and SVOCs in the atmosphere. There are no estimates of exposure to carbon black, a known carcinogen, on outdoor fields. Exposure estimates to fine particulate matter on outdoor fields are extremely limited, and relied exclusively on stationary monitors.

26. Highsmith, R., Thomas, K., & Williams, R. (2009). A Scoping-Level Field Monitoring Study of Synthetic Turf Fields and Playgrounds. National Exposure Research Laboratory, U.S. Environmental Protection Agency.

This study was readily available on the EPA's servers during the summer of 2015, **along with warnings that the results could not be generalized beyond the four sites sampled in the study.** However, that page was removed and access to the study from the EPA website was temporarily not possible. Now there is a link to the study from the EPA's Tire Crumb and Synthetic Turf Field Literature and Report list. **All warnings about the limitations of the study have been removed.**

This study examined airborne PM 10 and VOCs at four outdoor fields and one outdoor playground. Additionally the extractable heavy metals from surface wipes, the crumb rubber and the turf blades from each location were also measured. Bioaccessibility of the lead in the crumb rubber was

estimated using the protocols for assessing the bioaccessibility of lead in soil. The study protocols forage sampling on the turf fields did not mimic real world conditions. The protocols for the playgrounds were more realistic because the air samples were taken while the playgrounds were being actively used by children.

<http://www.libertytire.com/Libraries/Documents/USEPA-Study-Synthetic-Turf-Fields-Playgrounds-Nov-2009.sflb.ashx>

27. Pavilonis, B., Weisel, C., Buckley, B., & Lioy, P. (2013). Bioaccessibility and Risk Exposure to Metals and SVOCs in Artificial Turf Field Fill Materials and Fibers. Risk Analysis.

Based on their findings, the authors stated that, "Since it is possible that children may be exposed to potentially high concentrations of lead while using artificial turf fields we recommend, at a minimum, all infill and fibers should be certified for low or no lead content prior to purchase and installation."

It was very concerning that extremely high levels of lead and chromium were found in some of the samples of the tire crumb, the plastic turf and the biofluid extracts of these materials. The authors also noted the extreme variability of lead and chromium in the samples.

"Lead was detected in almost all field samples for digestive, sweat, and total extraction fluids with digestive fluid extract of one field sample as high as 260 mg/kg. Metal concentrations were not markedly different across the three different sample types (new infill, new turf fiber, tire crumb field sample). However, one of the new turf fiber samples contained relatively large concentrations of chromium (820 mg/kg) and lead (4,400 mg/kg) compared to the other samples tested...the variability of lead contained in the infill material is large and can span more than two orders of magnitude. One field [tire crumb] sample did contain a high lead level (260 mg/kg) which was on the same order of magnitude as the NJ DEP cleanup value (400 mg/kg)."

Other toxicants were also detected at low levels. However, this study likely significantly underestimated the levels of bioaccessibility of toxicants in the crumb rubber and turf. The study did not use biologically relevant crumb rubber particle sizes or incubation times when determining the bioaccessibility of SVOCs and metals in simulated biofluids. The dust and tiny particulates less than 10 microns in diameter that are most relevant, not the relatively large crumbs. Athletes are inhaling particulate matter often only a few microns in diameter and the particulate matter may stay lodged in the lungs for months, not 24 hours. Dust particles stick to the skin far more effectively than crumbs and are much harder to spit out when they accidentally get into the mouth. Surface area is a key factor in determining bioavailability. The toxicants in dust are far more bioavailable than those in crumbs. The initial study on the Ironbound Athletic Fields in New Jersey by the New Jersey Department of Health, the EPA, and the ASTDR analyzed the dust on the fields for lead content. Those researchers clearly recognized that the dust was the key to assessing the health risks posed by those fields. It is unclear why these authors would analyze tire shreds when dust is clearly the relevant particle size.

27. Marsili, L. C. (2016). Release of Polycyclic Aromatic Hydrocarbons and Heavy Metals from Rubber Crumb in Synthetic Turf Fields: Preliminary Hazard Assessment for Athletes. *Environmental & Analytical Toxicology*.

This study clearly demonstrated that both the temperature at which off gassing is measured and the model which is used to assess risk dramatically affect the conclusions of a risk assessment. When a risk assessment was done at 25 degrees Celsius, using the Lifetime Average Daily Dose to calculate cumulative excess cancer risk lead to estimates well below the de minimus level. However, when the risk assessment was conducted with the crumb rubber heated to 60 degrees, and a toxic equivalent quotient model was used, the exposure was up to 1,000 times the virtually safe dose of B(a)P in food.

Ariana Eunjung Cha, *The Washington Post*, 6/17/15 <https://www.washingtonpost.com/news/to-your-health/wp/2015/06/16/ddts-breast-cancer-legacy-pregnant-mothers-exposure-linked-to-four-fold-increase-in-daughters-risk/> and <http://press.endocrine.org/doi/10.1210/jc.2015-1841>)

Other studies have raised serious concerns about tire crumb and lead exposure.

A 2014 study found lead and other toxins in the both the plastic rug and tire crumb infill. Lead was also was found in simulated body fluids meaning there is little or no protection of any kind against the lead getting out of the material into the body. "Since it is possible that children may be exposed to potentially high concentrations of lead while using artificial turf fields we recommend, at a minimum, all infill and fibers should be certified for low or no lead content prior to purchase and installation."

("Bio-accessibility and Risk of Exposure to Metals and SVOCs in Artificial Turf Field Fill Materials and Fibers" Brian T. Pavilonis, Clifford P. Weisel, Brian Buckley, and Paul J. Lioy
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4038666/pdf/nihms565643.pdf> 2014)

No two fields are alike because each field contains 30,000 to 40,000 ground up tires, which come from a multitude of manufacturers.

"Every turf field has to be analyzed in detail to be sure it doesn't have a problem," said Paul Lioy, a professor of environmental and occupational medicine at the Robert Wood Johnson Medical School in New Jersey." [Emphasis added.] ("Feds promote artificial turf as safe despite health concerns," by Thomas Frank *USA Today*, 3/16/2015
<http://www.usatoday.com/story/news/2015/03/15/artificial-turf-health-safety-studies/24727111/>)

Artificial turf fields create "heat islands" – an environmental hazard.

The extreme heat "is not only a hazard for users, but also can contribute to the 'heat island effect,' in which cities become hotter than surrounding areas because of heat absorbed by dark man-made surfaces such as roofs and asphalt." ("Synthetic Turf: Health Debate Takes Root" by Luz Claudio, *Environmental Health Perspectives* 2008 March; 116(3): A116–A122. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2265067/>)

"Columbia University climate researcher Stuart Gaffin analyzed thermal images generated from NASA satellite maps of New York City. He wanted to figure out how urban trees may help cool down neighborhoods. When **Gaffin noticed a bunch of hot spots on the maps, he assumed they were rooftops**...two turned out to be turf fields" says Gaffin. In retrospect, he says he should have realized that, because they're a perfect sunlight-absorbing system." ("High Temps On Turf Fields Spark Safety Concerns," by Allison Aubrey, National Public Radio, 8/7/2008 <http://www.npr.org/templates/story/story.php?storyId=93364750>)

Artificial turf appears to contribute to elevated levels of zinc in the water.

"There is a potential risk to surface waters and aquatic organisms associated with whole effluent and zinc toxicity of stormwater runoff from AT fields." ("Artificial Turf Study, Leachate and Stormwater Characteristics," July 2010 Conn. Department of Environmental Protection)

"Crumb rubber derived entirely from truck tires may have an impact on aquatic life due to the release of zinc. For the other three types of crumb rubber, aquatic toxicity was found to be unlikely." Pg. 2

"Zinc concentrations are higher than the surface water standards." Pg. 29

("An Assessment of Chemical Leaching, Releases to Air and Temperature at Crumb-rubber Infilled Synthetic Turf Fields" May 2009 from staff at NY State Department of Environmental Conservation)

Plastic artificial turf blades will likely disintegrate and degrade with some ending up in bodies of water and in the food of wildlife either directly or via landfills; plastics of various sizes are already threatening aquatic life. The impacts of larger sized plastics is more widely known, but now more is being discovered about the serious effects of microplastics. ("Ingested microscopic plastic translocates to the circulatory system of the mussel, *Mytilus edulis* (L)." by Browne MA1, Dissanayake A, Galloway TS, Lowe DM, Thompson RC, *Environmental Science & Technology*, 7/1/2008 <http://www.ncbi.nlm.nih.gov/pubmed/18678044>)

"As plastic breaks into smaller pieces, it is more likely to infiltrate food webs. In laboratory and field studies, fish, invertebrates and microorganisms ingest micrometer-sized particles..." ("Classify plastic waste as hazardous," by Chelsea M. Rochman, Mark Anthony Browne, Eunha

Hoh, Hrisi K. Karapanagioti, Lorena M. Rios- Mendoza, Hideshige Takada, Swee Teh, Richard C. Thompson. *Nature*, 2/14/13.)

Environment: The pollutant substances found in artificial turf contribute to contamination of soil, plants and aquatic ecosystems and pose a risk of toxic effects for aquatic and sediment dwelling organisms. The resulting environmental harm is on-going and long-term, happening over many years. The varying content of tires used for infill of turf systems makes this threat a moving target. A growing body of scientific analysis is documenting a concerning level of environmental threat and harm and is further demonstrating the need for more research regarding artificial turf and its ramifications for the environment.

1. Public Employees for Environmental Responsibility (PEER) (2012). Petition for a Rulemaking on Surface Heat from Artificial Turf, Submitted by PEER to Consumer Product Safety Commission, Sept 6, 2012. Available at: http://www.peer.org/assets/docs/doc/9_6_12_PEER_Petition_heat_rulemaking.pdf
 - a. As well explained by an oft cited petition to the Consumer Product Safety Commission for rulemaking: "When tires are shredded and pulverized, their surface area increases exponentially, as does the particulate and gas yield from the tire material. Since tires are made of very harmful materials, including 24 gases found to be harmful to humans, carbon black, (a carcinogen which makes up 30% of tires), latex, benzothiazoles, phthalates, lead, mercury, cadmium, zinc and many other known toxins, when the fields heat up, they become increasingly dynamic. Of primary concern is the interaction of particles and gases, 'because when particles adsorb onto the surface of gases, they become 10-20 times more toxic than the materials themselves.'"
 - b. Furthermore, artificial turf becomes more toxic as it heats up.
2. Sadiktis, I., et al. (2012). Automobile Tires A Potential Source of Highly Carcinogenic Dibenzopyrenes to the Environment. *Environmental science & technology*, 46(6), 3326-3334. Available at: <http://www.locchiadiromolo.it/blog/wp-content/uploads/2012/03/Sadiktis-et-al-Automobile-Tires-Potential-Source-of-Highly-Carcinogenic-2012.pdf>
 - a. The variability in PAH concentrations between different tires is large.
 - b. Due to "leaching of PAHs from recycled tire rubber material, tires are a source of environmental pollution of PAHs through their entire lifecycle."
3. Connecticut Department of Environmental Protection (2010). Artificial Turf Study: Leachate and Stormwater Characteristics, Final Report. Available at: http://www.ct.gov/deep/lib/deep/artificialturf/dep_artificial_turf_report.pdf
 - a. Stormwater runoff from artificial turf contained zinc, manganese, and chromium at levels toxic to aquatic organisms.
 - b. Therefore, there is a potential risk to surface waters from the installation of artificial turf. Zinc levels could cause exceedance of acute aquatic toxicity criteria. This risk is especially high for smaller watercourses.
 - c. Best management practices and treatment (i.e. wetlands, wet ponds, infiltration structures, compost filter, sand filters, or biofiltration structures) should be used for stormwater runoff from artificial turf fields that discharge to surface waters.

4. Yaghoobian, N., et al. (2010). Modeling the thermal effects of artificial turf on the urban environment. *Journal of Applied Meteorology and Climatology*, 49(3), 332-345.
 - a. An urban temperature model showed an increase in local atmospheric temperatures of up to 4° C (39° F) in areas where natural grass cover had been replaced with artificial turf.
5. Han, I. K., et al. (2008). Hazardous chemicals in synthetic turf materials and their bioaccessibility in digestive fluids. *Journal of Exposure Science and Environmental Epidemiology*, 18(6), 600-607. Available at: <http://www.nature.com/jes/journal/v18/n6/pdf/jes200855a.pdf>
 - a. Zinc was found to exceed soil limits and the leaching rate from rubber granules was up to 20 times more than the leaching rate from agricultural applications of manure and pesticides. "Runoff with high Zn [zinc] from synthetic turf fields may produce adverse effects to plants and aquatic life."
6. KEMI, Swedish Chemicals Agency (2007). Facts: Synthetic Turf. April 2007. Available: <http://www2.kemi.se/upload/trycksaker/pdf/faktablad/fbsyntheticiturf.pdf>.
 - a. Hazardous substances found in tires may persist in the environment including polycyclic aromatic hydrocarbons (PAHs), phthalates, phenols, and certain metals.
 - b. Most PAHs are persistent, bioaccumulative and carcinogenic.
 - c. Phthalates and phenols are not chemically bound to the rubber and as a result can leach from the infill material. These chemicals are persistent and bioaccumulative and can have long-term effects on the environment.
7. Meil, J., & Bushi, L. (2006). Estimating the Required Global Warming Offsets to Achieve a Carbon Neutral Synthetic Field Turf System Installation. *Athena Institute. Ontario Canada*. Available at: <http://sfrecpark.org/wp-content/uploads/AthenaCarbonOffsets.pdf>
 - a. Artificial turf systems have a carbon footprint due to the greenhouse gases emitted during the life cycle of synthetic turf systems compared to natural grass surfaces.
 - b. To achieve a 10-year carbon neutral synthetic turf installation, 1861 trees would need to be planted to offset the field's carbon footprint.
8. Källqvist, T. (2005). Environmental risk assessment of artificial turf systems. *Norwegian Institute for Water Research*, 19.
 - a. Recycled rubber varies considerably in its chemical composition, even when from the same manufacturer.
 - b. Leaching of contaminants from artificial turf as the result of surface water runoff from precipitation is a great risk for the environment. It is predicted that chemicals leaching from synthetic turf materials occurs slowly, and as a result the environmental harms may take place over many years.
There is also a level of "erosion" that takes place and can result in fine particles that could be carried to local waterways. Chemicals have even been shown to leach from the artificial turf fibers.
 - c. The leachate from artificial turf can contain a variety of metals (including lead, cadmium, copper, mercury and zinc) and organic pollutants (including PAHs, phthalates, 4-t-octylphenol and isononyphenol).
 - d. The runoff from an artificial turf field poses "a positive risk of toxic effects on biota in the water phase and in the sediment."
 - e. Of the organic compounds at issue, octylphenol represents the greatest risk, and possibly could occur at levels where hormone disrupting effects are a concern.

f. The Norwegian Institute for Water Research has determined that it is "appropriate to perform a risk assessment which covers water and sediments in watercourses which receive run-off from artificial turf pitches."

9. Thale, S.W. et al. (2004) Potential Health and Environmental Effects Associated with Synthetic Turf Systems final report. Byggforsk, Norwegian Building Research Institute. Available at:

http://www.issssportsurfacescience.org/downloads/documents/vskyslv2qq_nbiengelsk.pdf

a. While recycled rubber is a greater source of pollution, newly manufactured rubber also contains levels of hazardous substances; in the case of zinc and chromium the levels of recycled and newly manufactured rubber are comparable.

b. The synthetic grass fibers can also be a significant source of pollution, albeit significantly lesser amounts leach from the synthetic grass than the rubber infill

10. Tucker, M.R. (1997). Ground Rubber: Potential Toxicity to Plants. Media Notes for North Carolina Growers, North Carolina Dept. of Agriculture & Consumer Services, April 1997. Available at:

<http://www.ncagr.gov/agronomi/pdf/rubber.pdf>

a. When talking about the use of ground rubber as a supplement to planting soils, the North Carolina

Department of Agriculture and Consumer Services sent out a notice identifying the risk that zinc leaching from the rubber causes a decline in plant growth "directly attributable to zinc toxicity."

11. Quoting Dr. Linda Chalker-Scott, Washington State University - Turfgrass Resource Center, Facts About Artificial Turf and Natural Grass. (n.d.) Available at:

<http://plasticfieldsforever.org/ArtificialTurfBooklet.pdf>

a. "There is no question that toxic substances leach from rubber as it degrades, contaminating the soil, flora, and fauna and aquatic systems."

12. IOSR Journal of Mechanical and Civil Engineering (IOSR-JMCE)

e-ISSN: 2278-1684,p-ISSN: 2320-334X, Volume 11, Issue 4 Ver. I (Jul- Aug. 2014), PP 07-11

www.iosrjournals.org "Nano particles in Automobile Tires"

1D. Giftson Felix, 2Dr. G. SivaKumar

1,2Department of Mechanical Engineering. Panimalar Engineering College. Chennai-123

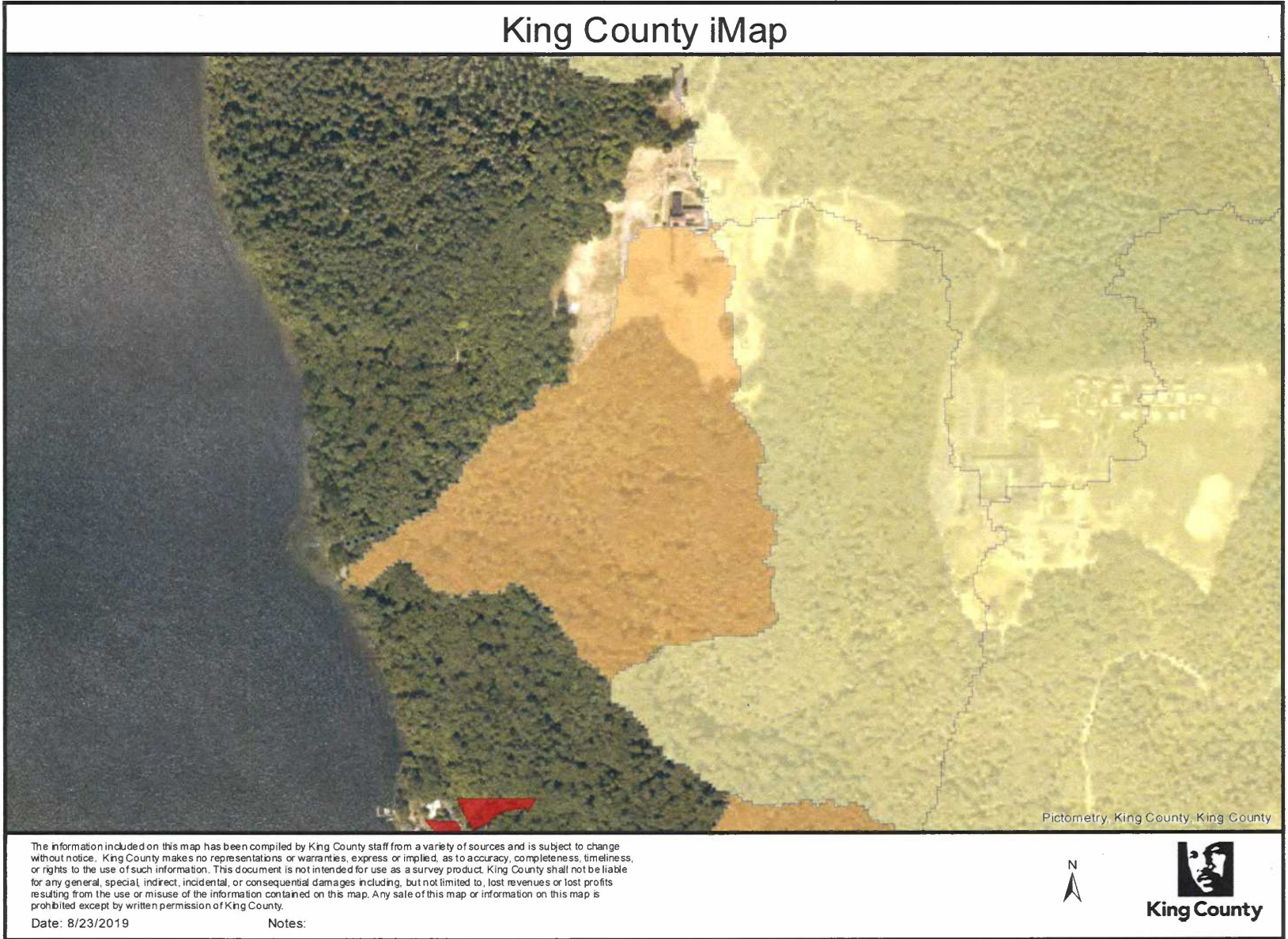
From introduction: "Driven by a growing demand for fuel efficiency, combined with strict automotive standards for safety, durability and noise, as represented by the new EU tire label, automotive tyre manufacturers are continuously seeking to create better and more ecological tires. For decades, rubber fillers, like carbon black and silica as nano-structured materials, were the drivers of improvements in tires. Recently, the innovation trend is moving down the supply chain to the material suppliers, with new additives and non-materials making their appearance, promising to expand further the 'magic triangle' of tires. Green tires have nowadays a market share of about 30% and the demand for tires of lower rolling resistance, lower weight and superior performance is likely to grow with the market uptake of electric cars. We are planning to add nanomaterial in all layers present in tire of an automobile thus to increase the life and to reduce the wear rate. "

The study examines various types of nanoparticles and how they are already used, often in complex layers, in tires to improve performance, grip, heat resistance, stiffness and decay.

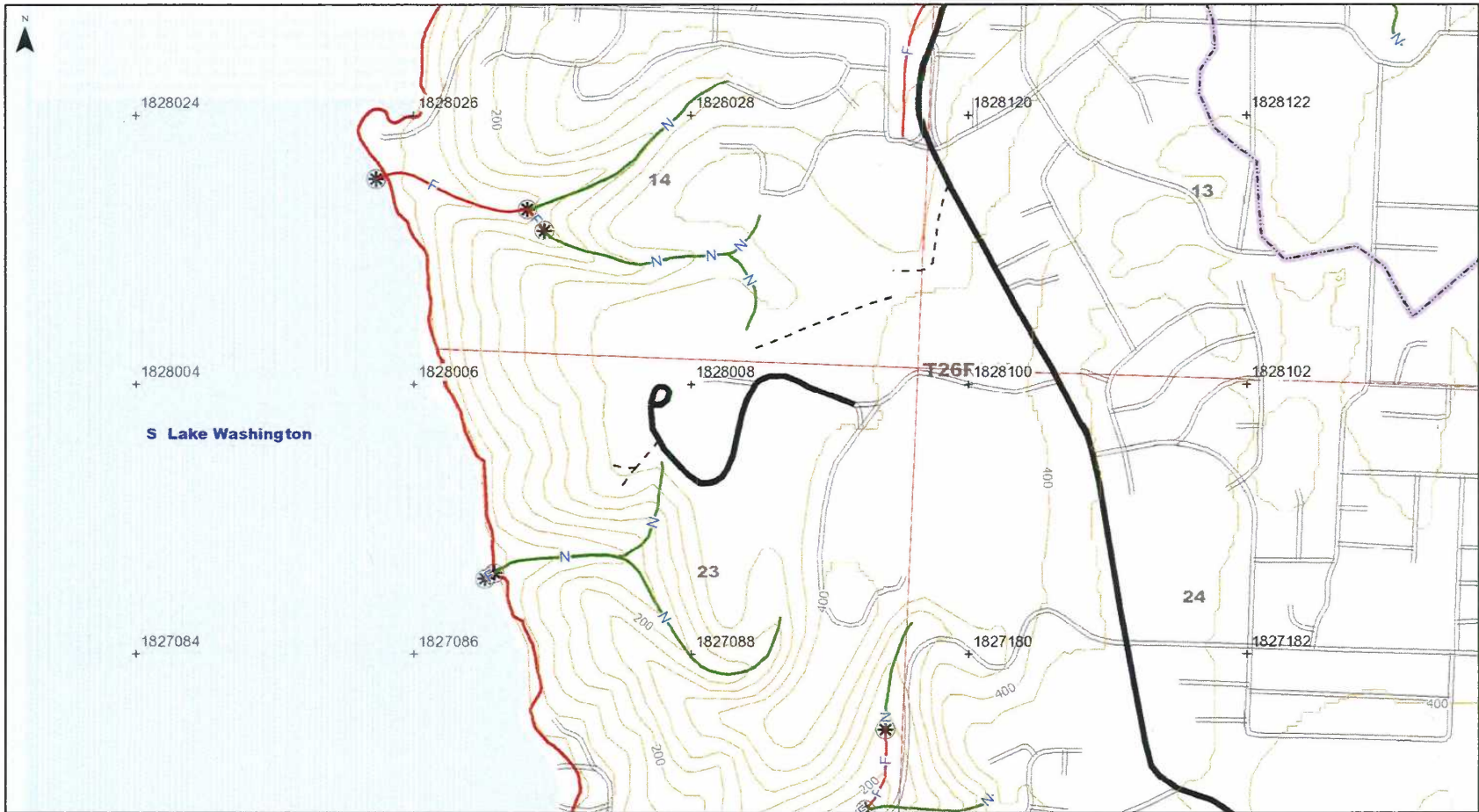
13. Turfgrass Resource Center (n.d.) Facts About Artificial Turf and Natural Grass. Available at:

<http://plasticfieldsforever.org/ArtificialTurfBooklet.pdf>

- a. Part of artificial turf maintenance is the regular replenishment of the infill. Some of the infill is merely settling, but some of it is washing away or literally “walking away” with players after use. The effects of this “runaway” infill are unknown and more research is needed to draw conclusions—where is it going and what impacts is it having?
- b. Maintenance of artificial turf can include application of algaecides or disinfectants to keep the surface clean and application of fabric softener to mask the odor of the artificial turf. What is the final destination of these chemicals and their implications for the environment and those coming into contact with them while playing on the fields?
- c. There is no indication that artificial turf drains more effectively for purposes of a stormwater infiltration system than natural grass. In addition, infiltration systems are designed to work with whatever surface coating they receive from natural grass to porous paving. Although there is no assumed benefit from an infiltration perspective of natural turf or artificial turf, in many cases the complex systems designed for artificial turf fields have experience problems, work incorrectly, or inefficiently.



Forest Practices Activity Map - Application



Map Symbols	Additional Information	Legal Description
- Harvest Boundary - Road Construction - Stream - RMZ / WMZ Buffers - Rock Pit - Landing - Waste Area - Clumped WRTS/GRTS - Existing Structure	Extreme care was used during the compilation of this map to ensure its accuracy. However, due to changes in data and the need to rely on outside information, the Department of Natural Resources cannot accept responsibility for errors or omissions, and therefore, there are no warranties that accompany this material.	S24 T26.0N R04.0E, S13 T26.0N R04.0E S14 T26.0N R04.0E, S23 T26.0N R04.0E
WASHINGTON STATE DEPARTMENT OF NATURAL RESOURCES		0 0.25 Miles Date: 8/23/2019 Time: 1:55:25 PM

Attachment 3: Location of wetlands adjacent to field area.

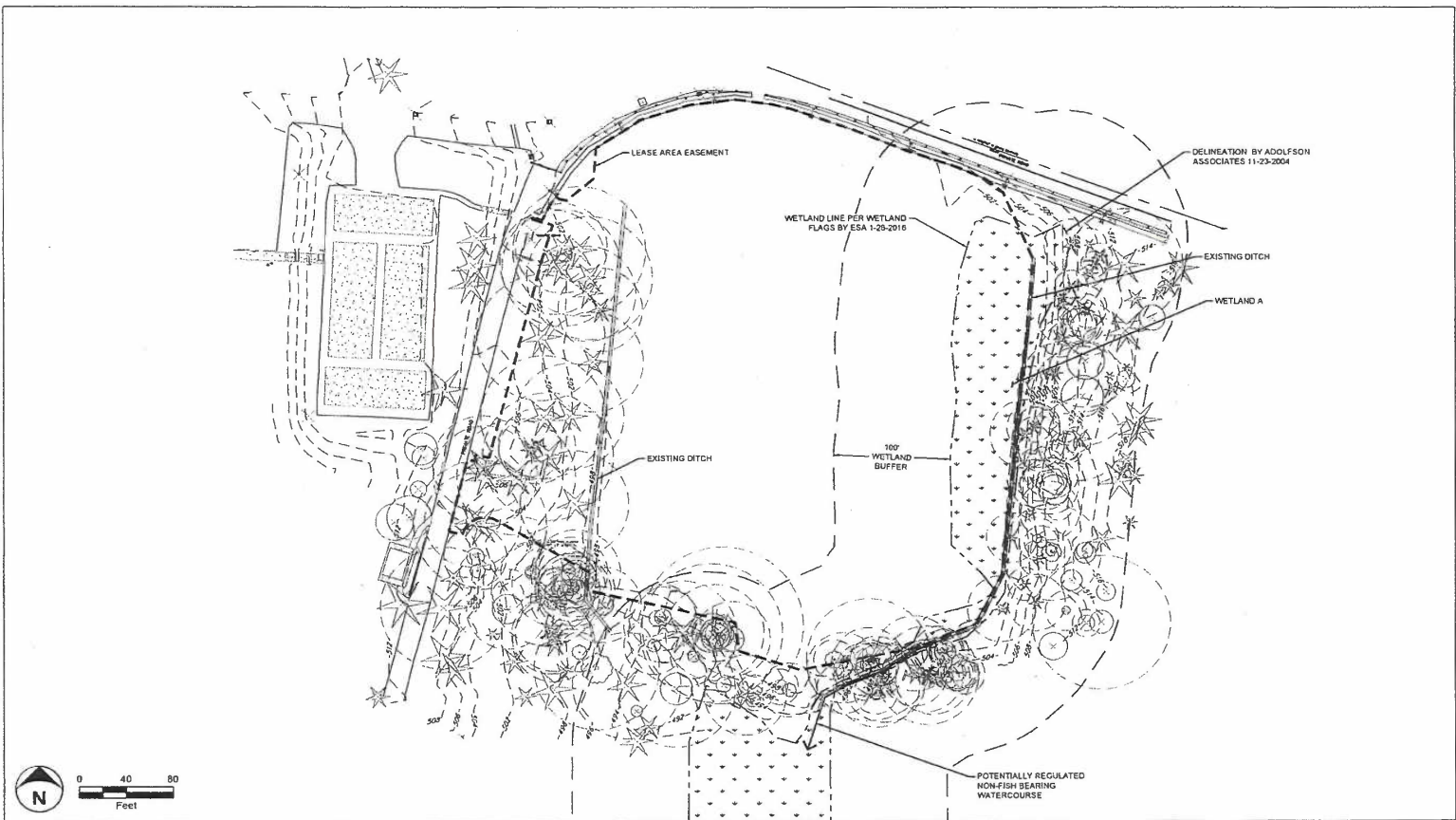


Figure 3
Wetland and Watercourse Survey Map
Kenmore, Washington



Date: August 29, 2019

To: Jessica Logan, Environmental Program Manager
Washington State Parks & Recreation
1111 Israel Rd. S.W.
Olympia WA 98504

Subject: **Saint Edward State Park Ballfields - SEPA Scoping Comments**

This is in response to the notice of "Determination of Significance (DS) and Request for Comments on Scope of EIS", dated July 31, 2019, for the above-named proposal. I favor that: 1) State Parks choose the "No Action alternative – how the field is used now (no lighting, existing grass)"; and 2) that the city of Kenmore pursue options (alternatives) outside the State Parks system in order to facilitate meeting the needs of local youth sports leagues. I oppose a lease to the city of Kenmore ("the City"). I oppose granting of a "Critical Areas Variance." Reasons are as follows:

Alternatives – The 2008 Washington State Parks & Recreation, Saint Edward State Park, Classification and Management Plan (CAMP), pages 18-19, states in part: "Natural grass fields are preferred....Field lighting is not recommended.... Ballfields, as community recreational facilities, are primarily a local responsibility."¹

The city of Kenmore, along with the cities of Bothell and Woodinville, comprise the Northshore School District (NSD) and are closely aligned in serving the needs of residents, especially the youth population. The city of Kenmore's own "Park, Recreation and Open Space Plan" adopted November 25, 2013², specifically addresses the need for "developing new and enhancing existing partnerships" with, among others, the Northshore School District. To date, the city of Kenmore's efforts to partner with the NSD have been minimal or non-existent.

NSD has a number of existing ballfields, Kenmore Elementary among them, which would greatly benefit from development and improvements. These sites could serve as venues to meet the needs of youth sports leagues if developed under joint use agreements between the City and NSD. Development could likely be accomplished with a SEPA "Determination of Non-Significance." Environmental impacts and development costs on school fields are likely to be substantially lower than those proposed in the City's preferred alternative at Saint Edward State Park. Joint use agreements between cities and school districts are a well-documented means of providing venues to meet the needs of youth sports leagues.

It is a matter of record that the city of Kirkland, which is Saint Edward State Park's neighbor to the south, has a vibrant partnership with the Lake Washington School District (LWSD). The city and LWSD use Interlocal Agreements to effectively serve the needs of youth sports leagues. The city's "Athletic Field Use Policies", November 2018³, reads in part:

"The District and City have a mutual interest in supporting programs for the community in the area of athletics, recreation and education. Through this cooperative arrangement, City and District's athletic fields and facilities can be used to meet broader community needs for education, recreation and athletic activities than either party can provide separately."

LWSD partners with the city of Kirkland at five elementary schools: Mark Twain, Juanita, Ben Franklin, Rose Hill and Lakeview; at Kirkland Junior High and at B.E.S.T. High School. The most recent effort is approval of a King County Youth & Amateur Sports Fund Grant (YASG) to renovate grass turf fields, make irrigation improvements and install new fencing & netting at Finn Hill Middle School at a total cost of \$97,183.

Youth who reside in Kenmore have access to fields throughout the Northshore School District. Northlake Little League members reside in both Kenmore and Bothell. Kenmore youth are served equally well whether playing in Kenmore or Bothell because of the close proximity of both communities to each other.

It is essential that costs and other elements of the city of Kenmore's preferred alternative be compared with costs of field development and improvement projects on NSD land.

Please consider the following elements regardless of alternative chosen:

1. **Historic & Cultural Preservation and Aesthetics** – installation of the proposed stadium-styled, 70-foot light poles would present a jarring sight on the park's culturally significant landscape. The entry road is identified as an historical element in the U. S. Department of the Interior, National Park Service "St. Edward Seminary, Cultural Landscape Inventory (2006), page 76, as follows:

*"The [entry] road was designed as a sequential experience that moved fluidly along the slopes, following contours up to the developed plateau of the seminary. The tradition for this design is grounded in landscape architecture history. The design concepts of views along a path, curvilinear movement with natural contours, and opening and closing of the adjacent landscape creating darkness and light, focus and inspiration, are all derived from the picturesque design traditions of the 18th century. The entry drive still displays these concepts. It begins in a wooded enclosure, a focused tunnel experience that leads to the first opening at the recreational fields to the east of the seminary building."*⁴

Introduction of artificial turf, in place of grass, would be equally disruptive. The historical legacy of the field will be best recognized by preserving the natural setting, not by introducing elaborate, artificial elements into the scenic landscape. The history of field use for baseball and other pursuits during the period when seminarians were in residence is best honored by retention of the existing grass area which does not intrude into the wetland buffer, and which is enjoyed by a wide range of visitors for various recreational activities, including a form of cricket not played on artificial turf; and by established groups including the "Wilderness Awareness School" from Woodinville⁵, and "Camp Roots" from Kenmore⁶, conducting outdoor activity and education programs year around in the both the grass field and wetland areas; and for operation of the newly established Environmental Education & Research Center (EERC) and its programs.

It is vitally important that cities act responsibly, conserve public resources, and, in the present situation, carefully choose locations for development of recreation facilities that minimize negative effects on the outdoor environment to the greatest extent possible. This is clearly not accomplished by the city of Kenmore's preferred alternative for "Artificial Turf with Field Lighting" and pursuit of a "Critical Area Variance."

3. **Cumulative Impacts** - Please include analysis of cumulative effects of light & glare, noise, parking, and traffic, that will likely be amplified when combined with effects associated with the operation of the leased seminary building.
4. **Climate Change and Land Use** - Given the emergence of information about the Earth's rapid climate change, it is essential that all elements of the proposed alternatives be examined in light of the "Preparing Washington State Parks for Climate Change" study (2017) ⁷ along with other credible sources. Please consider a change of land classification for the Saint Edward field, wetland and wetland buffer in accordance with "Washington State Parks Comprehensive Management Resource Policy" (2010), page 11, which states in part:

"State Parks has a mission of protecting resources of the system while providing for recreational use by the public...New developments will seek to minimize the impact of recreational activities to the natural resources of a park. Where existing recreational developments or uses are believed to degrade natural resources of regional or statewide significance, or the overall experience of visitors to a park, the agency will collaborate...to alleviate the impacts by limiting, removing, relocating, or mitigating the recreational activity. Habitat restoration efforts...and possible changes in land classification will be considered where resource values have been severely threatened by recreational use."

Conclusion - The "No Action" alternative is my "preferred choice" for responsible and effective planning. It will allow State Parks to focus on protection and enhancement of the wetland and its buffer; to no longer mow the buffer area and instead allow the wetland to flourish and do its job as intended. It will allow 620,000 annual visits to continue for all visitors who enjoy and benefit from the extraordinary natural environment that Saint Edward affords.

Thank you for you considering my comments.

¹ <https://parks.state.wa.us/DocumentCenter/View/1554/Saint-Edward-State-Park-Management-Plan->

² <http://www.kenmorewa.gov/sites/default/files/9%29%20Section%20Four%20-%20Guiding%20Fundamentals%20and%20Policy%20Support.pdf>

³ <https://www.kirklandwa.gov/Assets/Parks/Parks+Docs/Athletic+Field+Policy.pdf>

⁴ <https://www.nps.gov/aboutus/foia/foia-frd.htm>

⁵ <https://wildernessawareness.org>

⁶ <https://www.camproots.org>

⁷ <https://cig.uw.edu/wp-content/uploads/sites/2/2014/11/WA-Parks-Vulnerability-Assessment.pdf>

From:
To: [Logan, Jessica \(PARKS\)](#)
Subject: Please Washington State Park board rule a resounding NO on the proposed change of use.
Date: Friday, August 30, 2019 1:57:18 PM
Attachments: [image001.jpg](#)

City of Kenmore wants to spend 1/2 it's annual budget \$5,000,000 on an artificial ballfield at St Edward State Park. This is not a good use of the field nor tax payers money. I am a special ed teacher and take my adult students all the way from Seattle via Metro to the field for frequent Friday community integration outings. We race on the field and play pick-up games in the open unaltered field for the purpose of exposure to nature, because research shows that time in nature reduces anxiety and improves the mood.

Now Saint Edward State Park
"the field" is open grassland and is preserved as Passive Open Space.

The City of Kenmore proposes to develop a sports field complex on a 3.5 acre meadow that is adjacent to a Category II wetland in St. Edward State Park. A Category II wetland would be hard to replace, and why is it necessary to replace the field and wetlands buffer, the heart of the park?

The City of Kenmore's plan would have adverse environmental impact on a currently natural space and adverse impact to my students with disabilities and the public's access to nature in a metropolitan area.

St Edward State Park should remain a grass field and Passive Open Space. Please don't take it away from my students with disabilities, as it's our closest access to nature and a space that's all inclusive.

Please Washington State Park board rule a resounding NO on the proposed change of use.

Attachment 4



SCIENCE & DESIGN

January 16, 2020

Jessica Logan
 Washington State Parks & Recreation Commission
 PO Box 42650
 Olympia, WA 98504
 Via email: Jessica.Logan@PARKS.WA.GOV

Re: Proposal for Environmental Consulting Services
Saint Edward State Park/City of Kenmore Athletic Fields EIS
 The Watershed Company Reference Number: 180908

Dear Jessica:

Thank you for requesting a proposal for completion of the Environmental Impact Statement for Saint Edward State Park/City of Kenmore Athletic Fields. The EIS consultant team includes The Watershed Company with Vicki Morris Consulting, Robert Droll Landscape Architect, Herrera Environmental Consultants, and Heath Associates Inc. Under this proposal, we will conduct the tasks summarized below and detailed in the Scope of Work attached to this proposal.

Scope of Services:

Task 1. EIS Scoping and Refinement of Alternatives *****COMPLETED*****

Task 2. Preliminary Draft Environmental Impact Statement (PDEIS) **\$81,630**

2.1 Chapter 1 – Summary

2.2 Chapter 2 – Description of Proposed Action and Alternatives

2.3 Chapter 3 – Affected Environment, Potential Impacts, and Mitigation Measures

2.3.a Natural Environment

2.3.b Built Environment

Environmental Consulting Services Proposal
Logan, J.
January 16, 2020
Page 2

Task 3. Draft Environmental Impact Statement (DEIS)	\$37,830
3.1 Draft EIS	
3.2 Prepare for, Attend, and Document Findings of One Public Meeting during the Draft EIS Public Comment Period	
Task 4. Final Environmental Impact Statement (FEIS)	\$42,355
4.1 Response to Public Comments	
4.2 Preliminary Final EIS (PFEIS)	
4.3 Final EIS	
Task 5. EIS Consultant Team Coordination and Project Administration	\$26,565
5.1 Project development, management, coordination	
5.2 Invoicing and progress reports	
Task 6. Expenses (mileage, copies, other)	\$3,505

The Scope of Services (above) is based upon the Project Assumptions listed in the detailed Scope of Work attached to this proposal. If any facts or events differ from such assumptions, we will request authorization to adjust the Scope of Services and fees accordingly.

The total cost for these tasks will not exceed **\$191,885**. We bill on a time and materials basis with monthly invoices. We are available to begin this work following Notice-to Proceed. Please call if you have any questions or if we can provide additional information.

Sincerely,



Jennifer Creveling
Principal / Senior Biologist

Enclosures:

Detailed Scope of Work dated 1-16-2020
Scope of Services Agreement

Saint Edward State Park/City of Kenmore Athletic Fields EIS

The Watershed Company (with Vicki Morris Consulting Services, Robert Droll Landscape Architect, Herrera Environmental Consultants, and Heath Associates Inc.)

SCOPE OF WORK

February 7, 2019; revised March 20, 2019; revised January 16, 2020

1. EIS Scoping and Refinement of Alternatives

COMPLETED

2. Preliminary Draft Environmental Impact Statement (PDEIS)

Proposed Methodology. The EIS consultant team will prepare one Preliminary Draft EIS (PDEIS), substantially in the format of WAC 197-11-430, -435, and -440 for review and comment by State Parks and City of Kenmore (City). Our scope of work anticipates analysis of four action alternatives and the No Action alternative. This analysis will primarily rely on existing studies completed for earlier planning phases of this project, including SEPA checklists and associated technical reports prepared for City of Kenmore. The EIS consultant team will review and incorporate additional information provided in response to the data gap analysis submitted to State Parks and the City on 9/16/19.

We do not anticipate preparing any new technical reports. It may, however, be necessary to engage in literature review to a limited extent to respond to issues identified and literature cited in the EIS Scoping comments. Where there are differing professional opinions in the literature regarding potential project effects (e.g., with regard to climate change effects, water quality, and environmental health effects of artificial turf), the EIS consultant team will strive to briefly summarize both perspectives for objective consideration by decision makers. Mitigation measures proposed by the City (such as post-construction monitoring to confirm project effects or lack of effects) will be described to address potential concerns that cannot be resolved through research and analysis.

Methods for assessing the potential impacts of a project, and on a project, from climate change are in the early stages of development, especially for a recreational project. Washington State Parks has not yet formally developed policies on climate change. Further, based on guidance from the Department of Ecology (*Guidance for Ecology Including Greenhouse Gas Emissions in SEPA Reviews*; 6/3/11), the proposed project does not appear to meet the agency's threshold for warranting additional greenhouse gas (GHG) emissions analysis during SEPA review. Therefore, the content in

the EIS to address the project in the context of climate change will be limited to discussion and, if supported by available project data, limited qualitative analysis. Quantitative analysis will not be included.

As presented in the EIS Scoping Summary Report (dated 10/31/19), State Parks may choose to limit the scope of the EIS to only those elements of the environment for which potential significant adverse impacts are anticipated, consistent with WAC 197-11-440(6)(a). Our task description below identifies elements in the WAC 197-11-444 list that we assume will be excluded from discussion in the EIS.

The general outline of contents of the PDEIS will be as follows:

- Cover Memo
- Fact Sheet
- Readers' Guide
- Table of Contents
- Chapter 1 – Summary
- Chapter 2 – Description of the Proposed Action and Alternatives
- Chapter 3 – Affected Environment, Potential Impacts, and Mitigation Measures
- Chapter 4 – References

2.1 Chapter 1 – Summary. The PDEIS may not include Chapter 1 – Summary until after the EIS consultant team has addressed State Parks and City of Kenmore review comments on the main body of the PDEIS in Chapters 2 and 3. If this is the case, Chapter 1 will be completed as part of Task 3.

2.2 Chapter 2 – Description of the Proposed Action and Alternatives. The EIS team Phase 2 cost estimate and schedule assumes that State Parks and City of Kenmore will promptly and completely provide the information requested in the data gap analysis submitted to State Parks and the City on 9/16/19. We will work with City of Kenmore and its consultants, as may be further needed, to:

- Confirm/update the detailed description of the current proposal and all quantitative information needed for the impact analysis.
- Confirm the detailed description of the alternatives to be considered and to develop all quantitative information needed for the impact analysis of alternatives.
- Incorporate data gap information.

2.3 Chapter 3 – Affected Environment, Potential Impacts, and Mitigation Measures. The impact analysis of the proposed action and alternatives will be provided in PDEIS Chapter 3, which will be organized by elements of the Natural Environment and Built Environment listed in WAC 197-11-444.

Natural Environment. The EIS consultant team will independently review and consider information provided in the City of Kenmore SEPA Checklist for the project and information

provided in technical reports prepared by consultants to the City. The EIS consultant team may also review and consider other relevant sources of information. Based on the above, the EIS consultant team will prepare impartial drafts of the PDEIS Natural Environment text sections on Earth/Earthwork/Soils, Air Quality, Climate Change/Carbon Footprint/Loss of Carbon Sequestration, Water, Wetland and Stream, and Plants and Animals. Energy and Natural Resources will not be discussed in the EIS as no scoping comments were received on these elements and no significant impacts are anticipated.

Built Environment. The EIS consultant team will independently review and consider information provided in the City of Kenmore SEPA Checklist for the project and information provided in technical reports prepared by consultants to the City. The EIS consultant team may also review and consider other relevant sources of information. Based on the above, the EIS consultant team will prepare impartial drafts of the PDEIS Built Environment text sections on Environmental Health, Noise, Land and Shoreline Use, Relationship to Plans and Policies, Light and Glare, Aesthetics, Recreation, Historic and Cultural Preservation, and Transportation and Parking. Housing, Public Services, and Utilities will not be discussed in the EIS as no scoping comments were received on these elements and no significant impacts are anticipated.

Work Product:

One Preliminary Draft EIS for review and comment by State Parks and City of Kenmore.

3. Draft Environmental Impact Statement (DEIS)

3.1 Draft EIS. The EIS consultant team will address comments received from State Parks and City of Kenmore on the PDEIS and finalize the Draft EIS for State Parks and City of Kenmore to post on their websites for public review and City forums. If Chapter 1 – Summary is deferred from the PDEIS to the DEIS, this chapter will be completed and submitted to State Parks and City of Kenmore for separate review in advance of finalizing the DEIS.

The EIS consultant team will prepare a draft Notice of Availability for use by State Parks.

3.2 Prepare for, Attend, and Document Findings of One Public Meeting during the Draft EIS Public Comment Period. The EIS consultant team will prepare presentation materials and attend one public meeting. The presentation materials will leverage the materials prepared in Phase 1 to the extent possible. The EIS consultant team will prepare summary notes for use by State Parks and City of Kenmore following the public meeting.

Work Products:

- One complete draft of PDEIS Chapter 1 – Summary for State Parks and City of Kenmore review and comment prior to completion of the Draft EIS.

- One complete Draft EIS for State Parks to post on their website for public and agency review in accordance with WAC 197-11-455.
- Seven printed copies of the Draft EIS (3 for State Parks, 3 for City of Kenmore, and 1 for Department of Ecology SEPA Center).
- Draft Notice of Availability of the Draft EIS, to include notice of the dates of the public comment period and procedures for commenting, for use by State Parks.
- Public meeting presentation materials.
- Public meeting summary notes (one meeting, one version).

4. Final Environmental Impact Statement (FEIS)

4.1 Response to Public Comments. The EIS consultant team will organize public comments received and draft responses to these comments for review by State Parks and City of Kenmore. The draft response to comments will be submitted to State Parks and City of Kenmore for review in advance of all other content of the PFEIS.

4.2 Preliminary Final EIS (PFEIS). The EIS consultant team will revise the draft response to comments with input received from State Parks and City of Kenmore. The EIS consultant team will also prepare the contents of a Preliminary Final EIS, to include updating the Cover Memo, Fact Sheet, and Summary, and identifying changes made to Chapters 2 and 3 the Draft EIS. We recommend using tracked changes for this purpose. The PFEIS may or may not identify a preferred alternative, at the discretion of State Parks. One complete draft of the PFEIS will be provided to State Parks and the City of Kenmore for review and comment.

4.3 Final EIS. It is our understanding that State Parks would prefer to have the Final EIS reproduce the contents of the Draft EIS in-total, modified as appropriate based on comments received and other considerations that may occur between publication of the DEIS and FEIS. The EIS consultant team will address comments received from State Parks and the City of Kenmore on the PFEIS and finalize the FEIS document for State Parks and City of Kenmore to post on their websites.

Work Products:

- One preliminary draft of the response to public comments received on the Draft EIS.
- One complete Preliminary Final EIS for review and comment by State Parks and City of Kenmore.
- One Final EIS for State Parks and City of Kenmore to post on their websites in accordance with WAC 197-11-460.
- Fourteen printed copies of Final EIS (10 for State Parks, 3 for City of Kenmore, and 1 for Department of Ecology SEPA Center).
- Draft Notice of Availability of the Final EIS for use by State Parks and City of Kenmore.

5. EIS Consultant Team Coordination and Project Administration

5.1 Project management and coordination. This task assumes 1.5 hours per week for up to 15 months from Notice-to-Proceed for the Phase 2 work.

5.2 Invoicing and progress reports. This task assumes monthly invoices for up to 15 months from Notice-to-Proceed for the Phase 2 work.

Assumptions for overall EIS process:

- *Our overarching assumption is that site-specific technical studies have been completed and provide adequate information to summarize in the EIS with only additional qualitative analysis. The EIS team will review and evaluate new information provided in response to the data gap analysis submitted to State Parks and the City on 9/16/19. If the EIS consultant team determines that additional information is needed or is asked by State Parks to prepare additional technical studies, this would fall outside of this scope, budget, and preliminary schedule.*
- *We assume that State Parks will lead the public participation process and maintain the website for the Saint Edward Park/City of Kenmore Athletic Fields EIS. The EIS consultant team will support the public participation process through preparing presentation materials; participating in one public meeting during the Draft EIS comment period; and providing one summary for this meeting of the discussion and comments received. We assume that presentation materials for the public meeting will be limited to two new boards and minor edits and reprinting of existing boards from Phase 1.*
- *Public comments received will be transcribed and compiled by State Parks and delivered to the consultant team.*
- *Cost estimate assumes receipt of approximately 100 written public comments on the DEIS (letters or email communication), identifying an average of five issues each. If the number and/or complexity of comments received on the Draft EIS exceeds this estimate, the EIS consultant team may request authorization for additional budget and extension of the preliminary schedule.*
- *Preparation of more than one PDEIS, one set of preliminary draft responses to public comments, and/or one PFEIS for internal review by State Parks/City of Kenmore can be accommodated, provided that the EIS consultant team receives authorization for additional budget and extension of the preliminary schedule.*

- *If formal public hearings become necessary, participation by members of the EIS consultant team would be contracted separately.*
- *This scope of work and cost estimate may be affected by factors unknown at this time that may arise in response to public or agency comments or requests at any stage of EIS preparation.*
- *Time may be transferred from one task to another due to greater or lesser level of effort required, provided that each task shall be completed and the total budget shall not be exceeded without additional scope and budget authorization from State Parks.*
- *This proposal includes general coordination with State Parks and City of Kenmore via email and phone. In-person meetings beyond the number of meetings specified above in our task descriptions are not included. Additional coordination can be added if necessary, by authorized amendment to this agreement.*
- *This proposal is valid for a period of six months from the most recent date listed on the first page.*

Date: January 16, 2020

Project/Client Name: Saint Edward State Park EIS

TWC #: 180908

The Watershed Company – 750 6th Street South, Kirkland WA 98033

Scope of Services Agreement

- This Agreement represents the entire and integrated agreement between The Watershed Company and the Client and supersedes all prior negotiations, representations or agreements, either written or oral.
- The Watershed Company will be entitled to rely on the adequacy and accuracy of information provided by Client or Client's consultants and representatives. The Watershed Company shall not be responsible for the acts or omissions of the Client, Owner, Contractors, other consultants and their respective agents or employees, or any other persons or entities performing work on the Project who are not under the direct control or authority of The Watershed Company.
- The Watershed Company's services shall be limited to those expressly set forth in the attached Scope of Services and Proposal Assumptions (above), and the Watershed Company shall have no other obligations or responsibilities for the Project or to the Client except as agreed to in writing or as provided in this Agreement. All of The Watershed Company's services in any way related to the Project or Client shall be subject to the terms of this Agreement.
- This Agreement does not guarantee successful securement of permits that may be needed/required for project construction or occupancy. Nor does this Agreement guarantee that deliverables described in the Scope of Services will be approved and/or agreed-upon by one or more regulatory agencies. Specific regulatory requirements vary greatly amongst agencies and reviewers, such that code and regulation interpretation can be somewhat unpredictable. This Agreement is a good-faith effort to provide the services described in the Scope of Services; however, additional studies, revisions to prepare documents, responses to comments, meetings and other scope items not covered under this Agreement may be required.
- Additional Services will be subject to review and preauthorization by both Parties. Where The Watershed Company believes additional services are appropriate, it shall notify Client. Upon Client's written authorization, The Watershed Company may proceed with such services on a time-and-material basis to be paid by Client. Alternatively, additional services can be covered under a separate Agreement based on a new scope of services.
- The Watershed Company's services shall be provided consistent with and limited to the standard of care applicable to such services, which is that The Watershed Company shall provide its services consistent with the professional skill and care ordinarily provided by consultants practicing in the same or similar locality under the same or similar circumstances.
- The Watershed Company's services and deliverables are not a warranty or guarantee and The Watershed Company shall have no such obligation. Client shall provide appropriate contingencies for schedule and costs.
- The Watershed Company's services are intended for the Client's sole use and benefit and solely for the Client's use on the Project and shall not create any third-party rights. Except as agreed to in writing, The Watershed Company's services and work product shall not be used or relied on by any other person or entity, or for any purpose following substantial completion of the Project.
- This Agreement and any rights or deliverables hereunder may not be assigned or transferred without the written consent of both Parties.
- This unsigned Agreement is valid for a period of six months.
- If work conducted on the Project extends for a period of more than 18 months, hourly rates may be adjusted to reflect current rates.
- Any costs incurred by the Consultant for third-party subscription or fee-based services required by Client to receive, store, manage and maintain various records will be invoiced to the Client for reimbursement.
- The Watershed Company files liens as accounts approach 90 days' delinquency.