bastyr university

campus master plan EIS

final
environmental impact
statement
december 2004

The City Of Kenmore

P. O. Box 82607 · Kenmore, Washington 98028-0607

COVER MEMO

Environmental Review

This Final Environmental Impact Statement is being sent to agencies, Tribes, organizations, and individuals with an interest in the Bastyr University Campus Master Plan for expansion on the Saint Thomas Center site in Kenmore, Washington. The EIS analyzes the environmental impacts of the proposed action to adopt and implement the Campus Master Plan (or an alternative), and will be used by the City of Kenmore, along with other relevant considerations or documents, prior to taking action on the proposal. It is anticipated that the adopted Master Plan will result in an amendment to the City of Kenmore Comprehensive Land Use Plan and zoning regulations. It is also anticipated that future development on the campus will be guided by the provisions of a Planned Action Ordinance and/or Development Agreement approved by the City of Kenmore. If a Planned Action Ordinance is approved by the City, further environmental review for future development phases would not be necessary if it is determined that these proposals are consistent with the development levels in the Planned Action Ordinance.

Public and agency comment was invited during a 30-day comment period following issuance of the Draft EIS. The five letters of comment received are reproduced in this Final EIS, along with the City's response to each comment. Copies of the Final EIS are being sent to every agency, organization, and individual who received a copy of the Draft EIS, and to persons who commented on the Draft EIS if they were not previously on the Distribution List. Copies of the Final EIS can be obtained for the cost of printing from the City of Kenmore, Department of Community Development, beginning December 1st, 2004, at the address below. The document will also be posted on the City's website: *www.cityofkenmore.com*. Additional opportunities for public comment will occur during City of Kenmore Comprehensive Plan and Zoning Code amendments to implement the Campus Master Plan, and will be advertised during commercial site development approvals and permit issuance over the 25-year phased implementation of the campus expansion proposal. The City's contact person concerning this proposed action is:

Bob Sokol, Community Development Director
City of Kenmore
Department of Community Development
6700 NE 181st Street
Kenmore, WA 98028-0607

The Proposal and Alternatives

The Master Plan Proposal. Bastyr University and the City of Kenmore, Washington propose to adopt and implement a Master Plan to guide improvements on the University's Kenmore campus over the next 25 years. The University's objectives for growth and development of this campus include:

- Develop as a small university with slow and steady growth.
- Provide a mix of academic buildings and onsite housing.
- Design and implement measures to minimize traffic, parking and environmental impacts.
- Provide beneficial health and wellness resources to the community.
- Preserve and enhance the natural environment to the extent practicable.

The University proposes five phases of development. No new construction is anticipated before 2006, and most new construction is anticipated for the period 2010 through 2020. Enrollment is projected to grow at an average annual rate of about 60 students.

The Master Plan proposal (Alternative 1) organizes campus redevelopment and expansion around a central Academic Core in the western portion of the site. University gardens would be a defining feature of the campus, integrated throughout academic and housing areas, and surrounding a central campus meadow. The landscape and open space plan would build on the existing system of courtyards, pathways, and spaces, and provide the primary structure of the campus development pattern. The forest that surrounds the campus on four sides would be preserved to the maximum extent practicable. Trees would be planted around proposed gardens, academic buildings, and housing clusters to extend the forest into the campus as various phases of development are completed. As a design feature, a new gateway to the campus would be developed northeast of the existing building. The gateway would include a water feature (pond), crossed by the new main access road, bordered by gardens leading to the campus meadow.

Most campus services, including classrooms, laboratories, administrative offices, and dining facilities would be clustered on the west side of the Core. The existing Saint Thomas building would be renovated and expanded with an additional floor to house this mix of uses, and to add meeting facilities and garden courtyards. The colonnade entrance would be incorporated into the entrance of one of the new academic buildings, and the unique chapel would be preserved in its present character, with only Building, Fire, and Seismic code compliance improvements proposed.

Onsite housing (326 Low-, Medium-, and High-Density Housing units, to provide up to approximately 796 beds) is proposed north and south of the Academic Core, around the edges of the campus meadow, and in the forested area at the north end of the site.

Auxiliary uses proposed include a Wellness Center/Conference Center, and a Public Clinic. The Wellness Center/Conference Center (approximately 40,000 gsf) is proposed at the edge of the forest, on the north side of the meadow. The center would accommodate 60 to 80 patients in residence for natural health education and treatment, or approximately the same number of people for meetings and conferences. The Public Clinic (approximately 20,000 gsf) is proposed on the property frontage along Juanita Drive NE. The Public Clinic would serve as a center for naturopathic and homeopathic examination, diagnosis, and treatment (not intended to be a regional eastside clinic).

Other alternatives studied include:

Reduced Low-Density Housing. Alternative 2 differs from the Master Plan proposal (Alternative 1) in that two clusters of Low-Density Housing would be eliminated from the north end of the site. This would reduce clearing and grading requirements in the forested area by approximately 1.9 acres.

No Public Clinic. Alternative 3 differs from the Master Plan proposal (Alternative 1) in that the Public Clinic would not be constructed along the west side of Juanita Drive NE. This would avoid clearing and grading the wooded area adjacent to the roadway, constructing separate stormwater detention and treatment facilities and extending other utilities, generating trips associated with a new driveway along the west side of Juanita Drive NE, and lighting associated with a two-story structure at a location that is presently forested. Forest vegetation removal from the site would be approximately 1.4 acres less with Alternative 3 than with Alternative 1.

Private Residential Care Facility. Bastyr University may at some future time consider constructing a residential medical care facility on the campus in lieu of some housing clusters and the Wellness Center/Conference Center in the northern portion of the site. The Private Residential Care Facility (Alternative 4) would be solely focused on specialty care related to the practice of natural medicine. Typical conditions that might be treated include cancer, diabetes, and obesity. The facility would likely offer narrowly-focused surgical and imaging services, but would not provide emergency or trauma care normally associated with a community hospital. For purposes of environmental review, the development scenario for a facility of this type is assumed to require approximately 210,000 sf in gross floor area, which could be accommodated in a structure up to five stories in height, with a separate parking garage.

The No-Action Alternative. Bastyr University would relocate to some other site (not contemplated and unknown at this time) if they are unable to meet their campus expansion objectives on the Saint Thomas site. Future use of the site would be determined by the Catholic Archdiocese of Seattle, or by some other prospective purchaser, working with the City of Kenmore and consistent with applicable regulations.

Key Environmental Issues

Environmental issues evaluated in the EIS include:

- Earth: Topography, geology and soils, landslide hazards and seismic hazards.
- Water: Streams within the project area, and groundwater.
- Plants and Animals: Wetlands, wildlife, vegetation, and fish.
- Environmental Health: Potentially contaminated sites associated with fuel storage tanks, and building materials in structures to be renovated.
- Land Use: Land use patterns, compatibility, and relationship to plans and policies; aesthetics; light and glare; and historic structures.
- Transportation and Parking: Trip generation, trip distribution, and potential impacts to area roadways and intersections; traffic accident potential; transit services; non-motorized circulation; parking demand and supply.
- Public Services: Fire and emergency medical aid, and police protection.
- Utilities: Water, sewer, stormwater management, energy, and telecommunications.

Your interest in the City of Kenmore is greatly appreciated. If you would like more information about the proposed Master Plan or related subjects contact Bob Sokol at 425.398.8900.

FACT SHEET

Project Title: **Bastyr University Campus Master Plan for Expansion**

Location: The 51-acre campus is located in the southern portion of the City of Kenmore, south of NE 145th Street and west of Juanita Drive NE (see Location Map). St. Edward Park borders the site on three sides (north, south and west).

Brief Description of the Proposal: Bastyr University and the City of Kenmore propose to adopt and implement a Master Plan for facilities and improvements on the Kenmore, Washington campus that support the University's vision for growth over the next 25 years. The adopted Master Plan is anticipated to result in an amendment to the City of Kenmore Comprehensive Land Use Plan, in the form of a subarea plan. It is expected that future development on the campus will be guided by the provisions of a Planned Action Ordinance and/or Development Agreement with the City of Kenmore.

The University currently leases the Kenmore site from the Catholic Archdiocese of Seattle. The University is engaged in the Campus Master Plan and EIS process to confirm whether it can achieve its objectives for growth on this site. If not, Bastyr will relocate, and future use of the property will be determined by the Catholic Archdiocese, working with the City of Kenmore.

The objectives of the Master Plan for growth and development of Bastyr University over the next 25 years are listed below. The growth rate on which the Master Plan is based would result in a total student population of approximately 1,400 in 2010, and 1,925 in 2020, compared to the existing (2003) enrollment of approximately 1,200 students.

– Develop as a small university with slow and steady growth.
– Provide a mix of academic buildings and onsite housing.
– Develop and implement measures to minimize traffic, parking, and environmental impacts.
– Provide beneficial health and wellness resources to the community.
– Preserve and enhance the natural environment to the extent practicable.

To achieve these objectives, the Campus Master Plan is evaluated as the proposed action. Three site plan use alternatives are examined, along with the No-Action Alternative. The University proposes five phases of development, regardless of which development alternative is selected for implementation. No new construction is anticipated before 2006, and most new construction is anticipated for the period 2010 through 2020. Enrollment is projected to grow at an average annual rate of about 60 students.

Principal Alternatives:	– Reduced Low-Density Housing in the woods. – No Public Clinic along the west side of Juanita Drive NE. – Addition of a Private Onsite Residential Care Facility. – No-Action Alternative.
Project Proponent:	Bastyr University 14500 Juanita Drive NE Kenmore, WA 98028-4966
Schedule for Implementation:	2006–2030
Lead Agency:	City of Kenmore 6700 NE 181st Street Kenmore, WA 98028-0607
City of Kenmore SEPA File No.	PLA2004-126
SEPA Responsible Official:	Bob Sokol Community Development Director City of Kenmore 425.398.8900
SEPA Contact Person:	Bob Sokol, Community Development Director
Project Information Contact Person:	Sandi Cutler, Senior Counsel Bastyr University 14500 Juanita Drive NE Kenmore, WA 98028-4966 425.602.3008

Permits and Approvals Required:

City of Kenmore	Comprehensive Plan Amendment and Rezone
City of Kenmore	Planned Action Ordinance and/or Development Agreement
City of Kenmore	Site Development Approvals
City of Kenmore	Clearing and Grading permits
City of Kenmore	Building, Plumbing, and Mechanical permits
City of Kenmore	Drainage Variance: Natural Discharge Location Adjustment (to allow use of existing drainage basins, rather than natural conditions prior to fill placed on the site in 1957).
City of Kenmore	Drainage Variance: Flow Control Adjustment (to use 1995 site conditions as the baseline, rather than forested conditions).
City of Kenmore	Drainage Review: Verify stormwater management compliance with the King County Surface Water Design Manual and Kenmore Municipal Code, during construction and in the completed condition of each phase of development.
City of Kenmore	Intersection approach and traffic signal installation/operation at NE 145th Street/Juanita Drive.
Washington State Parks	Joint Access Agreement and design approval for proposed improvements to NE 145th Street.

Permits and Approvals Required, *continued*	
Washington State Parks, City of Kenmore, and Northshore Fire District	Secondary (emergency vehicle) access agreement.
Washington State Parks	Permission to cross State Park land with construction of the proposed campus loop road, and to construct utility upgrades extended from offsite distribution systems.
Washington State Parks	Permission to implement possible wetland and/or stream mitigation projects on State Park land, preferably within the drainage subbasins where potential impacts would occur.
Washington State Parks	Possible Joint Parking Agreement to address construction parking requirements.
Washington Department of Ecology	National Pollutant Discharge Elimination System (NPDES) Construction General Permit.
U.S. Army Corps of Engineers	Possible requirement for Section 404 permit for wetland fill associated with proposed roadway improvements.
Washington Department of Fish & Wildlife	Possible requirement for Hydraulic Project Approval for stream crossings by roadway and/or utility improvements.
Washington Department of Natural Resources (or King County, 2006)	Forest Practices permit for logging.
Washington Department of Labor & Industries	Electrical permits.
Northshore Utility District	Utility design and connection permits.
EIS Authors and Principal Contributors:	**Vicki Morris Consulting Services** *EIS Prime Consultant and Primary Author* **KPFF Consulting Engineers, Inc.** *Infrastructure and Construction Sequencing,* and *Utilities* **Shannon & Wilson, Inc.** *Earth, Water, Plants and Animals,* and *Environmental Health* **Heffron Transportation, Inc.** *Transportation Impact Analysis* **SvR Design Company** *Drainage and Utilities Report* **Jones & Stokes** *Relationship to City of Kenmore Comprehensive Land Use Plan and Zoning Regulations; Master Plan Agreement;* and *Planned Action Ordinance/Development Agreement* **MIG, Inc.** *Campus Master Plan* and *Graphic Illustrations*
Final EIS Date of Issue:	December 1, 2004

Location of Final EIS for Review or Purchase:	City of Kenmore 6700 NE 181st Street Kenmore, WA 98028-0607 City of Kenmore website: *www.cityofkenmore.com*
Additional Locations where the Final EIS is Available for Review:	City of Kenmore Public Library 18138 73rd NE, Kirkland, WA 98028 City of Bothell Public Library 18215 98th Avenue NE, Bothell, WA 98011 City of Brier Public Library 23303 Brier Road, Brier, WA 98036 King County Library System, Kirkland Branch 308 Kirkland Avenue, Kirkland, WA 98033 King County Library System, Lake Forest Park Branch 17171 Bothell Way NE, Lake Forest Park, WA 98155
Cost to the Public to Purchase a Copy of the Final EIS:	$ 8.00 Copies of the Final EIS are available to purchase from the City of Kenmore, Department of Community Development, for the cost of printing.

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1.0 SUMMARY

1.1 Purpose and Objectives of the Proposal

The purpose of the Bastyr University Campus Master Plan is to guide the expansion of academic programs, increase and improve onsite residential facilities, and to plan for future growth of the Kenmore campus. Bastyr students, faculty, and staff have participated in a University-wide planning process, coordinated with the City of Kenmore, to develop a program of facility improvements integrated with the natural features of the site, to support the University's vision for the next 25 years. The purpose of the Master Plan program is to define the types and size of facilities needed to support a target enrollment of approximately 2,630 students by the year 2030. This represents a growth rate of approximately 3.2 percent or approximately 60 new students per year. The objectives of the Master Plan proposal are to:

- Develop as a small university with slow and steady growth.
- Provide a mix of academic buildings and onsite housing.
- Design and implement measures to minimize traffic, parking and environmental impacts.
- Provide beneficial health and wellness resources to the community.
- Preserve and enhance the natural environment to the extent practicable.

1.2 History and Background of Institutional Use of the Site

In the 1920s, the Catholic Archdiocese of Seattle donated land to the Sulpician Order of Catholic Priests that includes the 51-acre site now occupied by Bastyr University (Figure 1.2-1). Subsequently, Saint Edward Seminary was built northwest of this parcel in 1931. The Saint Thomas Seminary, the main campus building on the Bastyr University site, was constructed in 1957 (Figure 1.2-2). In 1977, the Archdiocese sold 316 acres of their property to the State of Washington for use as a state park, including the property occupied by the Saint Edward Seminary. That site is now known as Saint Edward Park. The Archdiocese retained ownership of the 51 acres surrounding the Saint Thomas Seminary.

The Saint Thomas Seminary operated as an accredited college between 1957 and 1974, after which other institutional uses have occurred on the site, including Western Washington University continuing education courses, conferences, events, residential drug abuse treatment programs, and a private non-profit women's treatment center.

Bastyr University relocated to the Saint Thomas Center in 1995. The University entered into a long-term lease/purchase agreement with the Catholic Archdiocese of Seattle; thus, the Archdiocese is still the owner of the property at the time of this writing. Though the lease is 20 years in duration, July 1, 2006 has been identified by the parties to the agreement as the most advantageous date for acquisition of the property by the University.

N

Not to Scale

Map prepared by MIG, Inc. - November, 2004

Figure 1.2-1.
Bastyr University Location Map

Bastyr University Campus Master Plan EIS

N

Not to Scale

Figure 1.2-2.
Bastyr University Site Map

Map prepared by MIG, Inc. - November, 2004

1.3 SEPA Procedures and Public Involvement

The City of Kenmore and Bastyr University mutually agreed that environmental review of the Campus Master Plan would require preparation of an Environmental Impact Statement.

EIS Scoping was conducted between June 19, 2003 and July 15, 2003, in accordance with WAC 197-11-408. Issues specified in the Scoping Notice for analysis in the EIS included: Earth (slopes, excavation, foundation support, soil infiltration potential); Water (streams); Plants and Animals (wetlands, wildlife, and habitat); Environmental Health (fuel storage tanks and similar remnants of former uses); Land Use (land use patterns, compatibility, aesthetics, light and glare, relationship to plans and policies); Transportation and Parking; Public Services; and Utilities (water, sewer, stormwater management, energy, and telecommunications). Public comments were received on the scope of the EIS through oral testimony given at a public meeting held July 8, 2003 on the Bastyr University campus, and through two letters of comment submitted to the City.

The predominant concern expressed in the Scoping comments related to discontinuation of public use of ballfields (soccer, baseball) on the campus. The City is currently engaged in addressing the need for additional ballfields in the community through implementation of its Parks and Recreation Master Plan.

Other concerns identified in Scoping comments included: traffic, parking, secondary access, onsite circulation, and bicycle use of Juanita Drive NE; compatibility of the campus population with the surrounding community; uses contemplated in the Master Plan; consideration of offsite locations for some proposed uses; economic impact on public services; mechanisms for notifying the community of changes taking place on the Bastyr University campus; and opportunities for continued public use of Bastyr facilities. A summary of Scoping comments received was issued by the City on August 6, 2003 to individuals who attended the Scoping meeting and indicated an interest by providing their names and addresses on a sign-up sheet. The summary of Scoping comments was also posted on the City's website at that time.

The Draft EIS was completed and distributed on October 5, 2004. The Draft EIS or a Notice of Availability was sent to agencies, Tribes, organizations, individuals who had expressed an interest in the project, and all property owners within 500 feet of the campus perimeter. A complete distribution list is provided in Chapter 5 of the Draft EIS, and Chapter 4 of the Final EIS. The document was also available for review at Kenmore City Hall and area libraries, and posted on the City's website (October 5, 2004). The Washington State Environmental Policy Act (SEPA) requires a 30-day comment period for the Draft EIS, and recommends holding a public meeting to receive comments during this period. Legal notice of the comment period and public meeting date and time was published in the *King County Journal* and *Bothell-Kenmore Reporter* on October 4, 2004. Public comment opportunities were also noted in the Draft EIS Fact Sheet (page iii), and advertised in the Notice of Draft EIS Availability mailed to interested agencies and individuals, and sent to adjacent property owners, as described above. A public meeting to receive verbal comments on the Draft EIS and on the proposed action was held October 27, 2004, on the Bastyr University campus. The meeting never formally convened, as no audience appeared.

Five letters of comment on the Draft EIS were received by the City of Kenmore: three from agencies (the Bothell Fire Marshal, King County Fire Protection District No. 16, and the Washington State Parks and Recreation Commission), and two e-mail communications from interested individuals. These are reproduced in Chapter 2 of this Final EIS. The City's response to each comment follows each letter. The Final EIS will be sent to all agencies, organizations, and individuals who received a copy of the Draft EIS, and to the additional individuals who submitted comments on the Draft EIS.

Together, the Draft and Final EIS constitute complete environmental review for the Bastyr University Campus Master Plan and subsequent project-specific development proposals that implement the Master Plan. It is expected that no further environmental review will be conducted unless significant changes to the Master Plan are proposed, and/or if conditions noted in the EIS trigger the need for additional review (e.g., the secondary access proposal, possible future development of a Private Residential Care Facility on the campus, or mitigation for campus growth between 1995 and 2003).

The EIS analyzes the environmental impacts of the proposed action, and will be used by City of Kenmore decision makers, along with other relevant considerations or documents, in making decisions regarding: Master Plan approval, a Planned Action Ordinance and Development Agreement, City of Kenmore Comprehensive Plan amendment, and City of Kenmore Zoning Code amendments. There will be no action on these proposals until 7 days or more following the date of issue of the Final EIS.

1.4 Master Plan Agreement and Planned Action Environmental Review

The City of Kenmore, the Catholic Archdiocese, and Bastyr University, in recognition of the benefits to the community of coordinated planning, have entered into a voluntary agreement to coordinate planning activities affecting the future use and development of the site currently occupied by Bastyr University. Specifically, the agreement establishes a process for integration of the University's master planning process with the City's environmental review and comprehensive plan amendment process. The City intends to incorporate provisions of the Bastyr University Campus Master Plan as a subarea plan of the City-wide Comprehensive Land Use Plan. In addition, it is possible that the City will adopt a Planned Action Ordinance in accordance with the provisions of the Washington State Environmental Policy Act (SEPA), and/or a Development Agreement in accordance with the provisions of RCW 36.70B170 et seq. (or some comparable approach) to establish site-specific land use regulations, development standards, and mitigation requirements for future growth and development on the campus. If a Planned Action Ordinance is approved by the City, then further environmental review for future development phases would not be necessary if the proposed action is consistent with the development levels in the Planned Action Ordinance. If a Development Agreement is executed between the City and the University, this agreement may provide for vesting in certain City development regulations, may detail mitigation measures that will be required in the future, and/or may establish specific thresholds for the circumstances under which additional environmental review must be conducted or when new codes will be applied. It is important to note that a Development Agreement cannot be used to avoid or reduce current code requirements but can provide a higher degree of certainty regarding future actions and outcomes.

The City and Bastyr University have also agreed in principle to a voluntary agreement on the part of the University to mitigate impacts associated with increases in campus population on the site between 1995 and 2003. Key features of this voluntary mitigation agreement may include:

- Providing stormwater detention and water quality treatment for impervious surfaces (i.e., parking lots) added to the site between 1995 and 2003.
- Complying with City of Kenmore onsite parking and offsite traffic mitigation requirements for the campus population that exceeds the 1995 permitted level of use.
- Addressing City of Kenmore secondary (emergency) vehicle access requirements for the campus and the adjoining Saint Edward Park.

This EIS has been prepared based on an assumption that this voluntary agreement will be executed between the parties, and as a result, the 2003 student population and campus activities were used as the

baseline level for purposes of identifying and evaluating potential impacts associated with the projected growth and future development of the Bastyr campus. If a mitigation agreement is not executed, additional environmental review would likely be required.

This Environmental Impact Statement (EIS) has been prepared for use in the City of Kenmore decision-making process concerning designating the Bastyr University Campus Master Plan as a "planned action," and potentially entering into a Development Agreement for build-out of the approved Plan. Detailed provisions for designating planned actions, and the overall "umbrella" of environmental review that can be conducted at this conceptual level of planning for campus expansion are described in Draft EIS Section 2.5.

1.5 The Master Plan Proposal

The Master Plan proposal organizes campus redevelopment and expansion around a central Academic Core in the western portion of the site (Figure 1.5-1). University gardens would be a defining feature of the campus, integrated throughout academic and housing areas, and surrounding a central campus meadow (Figure 1.5-2). The landscape and open space plan would build on the existing system of courtyards, pathways, and spaces, and provide the primary structure of the campus development pattern (Figure 1.5-3). The forest that surrounds the campus on four sides would be preserved to the maximum extent practicable. Trees would be planted around proposed gardens, academic buildings, and housing clusters to extend the mixed Douglas fir/deciduous forest into the campus as various phases of development are completed. As a design feature, a new gateway to the campus would be developed northeast of the existing building. The gateway would include a water feature (pond), crossed by the new main access road, bordered by gardens leading to the campus meadow.

Most campus services, including classrooms, laboratories, administrative offices, and dining facilities would be clustered on the west side of the Core. The existing Saint Thomas building would be renovated and expanded with an additional floor to house this mix of uses, and to add meeting facilities and garden courtyards. The colonnade entrance would be incorporated into the entrance of one of the new academic buildings, and the unique chapel would be preserved in its present character, with only Building, Fire, and Seismic code compliance improvements proposed.

Onsite housing (326 Low-, Medium-, and High-Density Housing units, to provide up to 796 beds[1]) is proposed north and south of the Academic Core, around the edges of the campus meadow, and in the forested area at the north end of the site (Figure 1.5-1).

Auxiliary uses proposed include a Wellness Center/Conference Center, and a Public Clinic. The Wellness Center/Conference Center (approximately 40,000 gsf) is proposed at the edge of the forest, on the north side of the meadow. The center would accommodate 60 to 80 patients in residence for natural health education and treatment, or approximately the same number of people for meetings and conferences. The Public Clinic (approximately 20,000 gsf) is proposed on the property frontage along Juanita Drive NE. The Public Clinic would serve as a center for naturopathic and homeopathic examination, diagnosis, and treatment (not intended to be a regional eastside clinic).

[1] The Draft EIS analysis is based on an estimate of 4 to 6 beds per Medium-Density Housing unit, of which 36 units are proposed for occupancy by families. It is unlikely that the population per household in these units will be as high as 6 persons; therefore, the Draft EIS analysis was conservatively high with regard to population projections and trip generation rates.

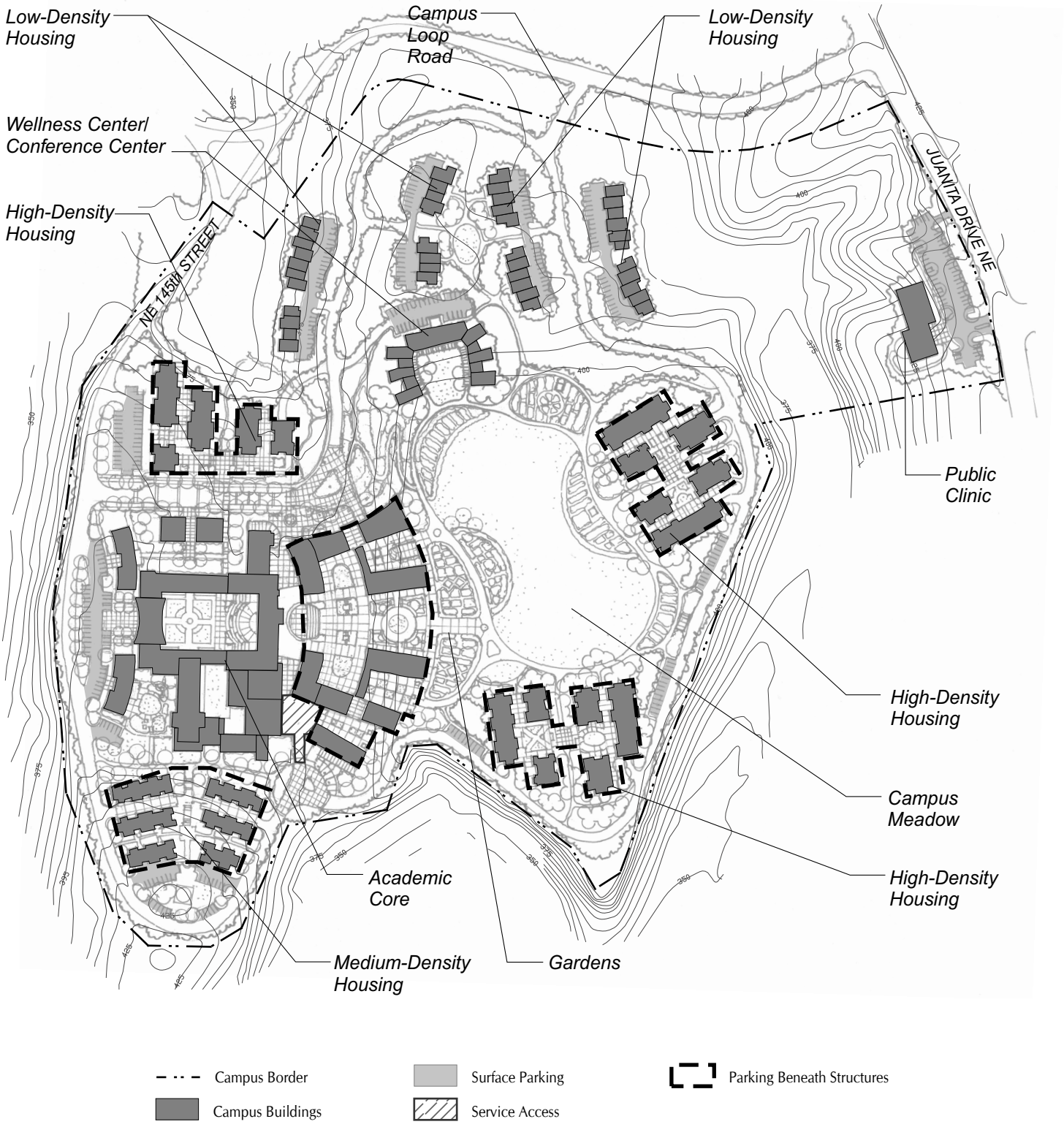
The space projections of the campus expansion proposal indicate an increase from approximately 179,000 gross square feet (gsf) at the present time, to 432,800 gsf by full build-out in 2030 (Table 1.5-1). Detailed descriptions of proposed principle features of development are provided in Draft EIS Section 2.6.

Future campus development would result in removal of the athletic fields potentially as soon as 2006, but would preserve a portion of this area as a formal meadow approximately 3 acres in size between the forest, housing, and academic buildings. The campus meadow would provide open space for recreation, passive enjoyment, informal gatherings, and quiet study.

Table 1.5-1. Bastyr University Campus Master Plan space projections (MIG, February 2004).

Program	Elements	Existing Permanent Space (GSF) [1]	Additional Space Needs: 2030 (GSF) [1]	Total Space Needs: 2030 (GSF) [1]
Academic Core	Office Space	38,000	55,000	93,000
	Lecture Classrooms	22,000	11,000	33,000
	Lab Classrooms	22,000	22,000	44,000
	Conference Rooms	4,000	(2,000)	2,000
	Library	8,000	6,000	14,000
	Research Center	0	31,000	31,000
	University Enterprise Space	10,000	25,000	35,000
	On-Campus Clinic	0	12,000	12,000
	Examination Rooms	2,000	0	2,000
	Dormitory Rooms	20,000	(20,000)	0
	Bookstore	2,000	4,000	6,000
	Student Union	2,700	400	3,100
	Employee Lounge	600	300	900
	Childcare Center	0	6,000	6,000
	Food Services/Cafeteria	16,000	(4,000)	12,000
	Large Group Assembly	6,000	2,000	8,000
	Indoor Recreation	0	2,000	2,000
	Chapel	18,000	0	18,000
	Unprogrammed Academics	0	23,000	23,000
	Subtotal	*171,300*	*173,700*	*345,000*
Wellness Center/ Conference Center		0	40,000	40,000
Public Clinic		0	20,000	20,000
	Subtotal	*0*	*60,000*	*60,000*
Physical Plant	Physical Plant	6,000	8,000	14,000
	Information Technology	1,700	100	1,800
	Institutional Storage	0	12,000	12,000
	Subtotal	*7,700*	*20,100*	*27,800*
	Total (GSF) [1]	**179,000**	**253,800**	**432,800**

[1] GSF = gross square feet.



Map prepared by MIG, Inc. - November, 2004

Figure 1.5-1.
Alternative 1: Master Plan

Bastyr University Campus Master Plan EIS

Map prepared by MIG, Inc. - November, 2004

Figure 1.5-2.
Bastyr Gardens Plan

Bastyr University Campus Master Plan EIS

Figure 1.5-3.
Landscape Framework

Bastyr University Campus Master Plan EIS

Map prepared by MIG, Inc. - November, 2004

Access improvements to NE 145th Street, and at the intersection of NE 145th Street with Juanita Drive NE, will be required to serve growth and development on the Bastyr University campus (Figure 1.5-4). The University proposes to make certain improvements and install a traffic signal at this intersection as the campus population expands. The contemplated Development Agreement and Planned Action Ordinance would provide specific requirements for installing these improvements, tied to campus growth or to specific phases of campus expansion. Onsite circulation would be enhanced by the proposal to construct a campus loop road (a private roadway) around the interior perimeter of the site (Figure 1.5-5). Onsite parking is proposed in a combination of surface lots and structures (Figure 1.5-6). The Master Plan proposal emphasizes pedestrian circulation around the central meadow, housing clusters, and Academic Core.

Stormwater management facilities would be provided in accordance with applicable City of Kenmore regulations. Two variances are requested, as described in Draft EIS Section 2.6.2, based on alterations to natural conditions that occurred during construction of the Saint Thomas Seminary on the site in 1957.

The University proposes to implement the Campus Master Plan in five phases between 2006 and 2030 to: 1) respond to projected growth in enrollment, 2) correspond with the financing plan for the project, and 3) manage the impacts of campus development (Figure 1.5-7). Details of the phasing proposal are described in Draft EIS Section 2.6.3, with the following exception. Based on slightly lower-than-projected enrollments in 2004, and in order to better manage traffic and parking impacts, the University has decreased its Phase 1 on-campus population projection by 19. Thus, the Phase 1 on-campus population for the year 2010 would not exceed the 2003 baseline. See revisions to Draft EIS Tables 2.4.3-1 and 2.6.3-1 in the Final EIS Errata section (Chapter 3).

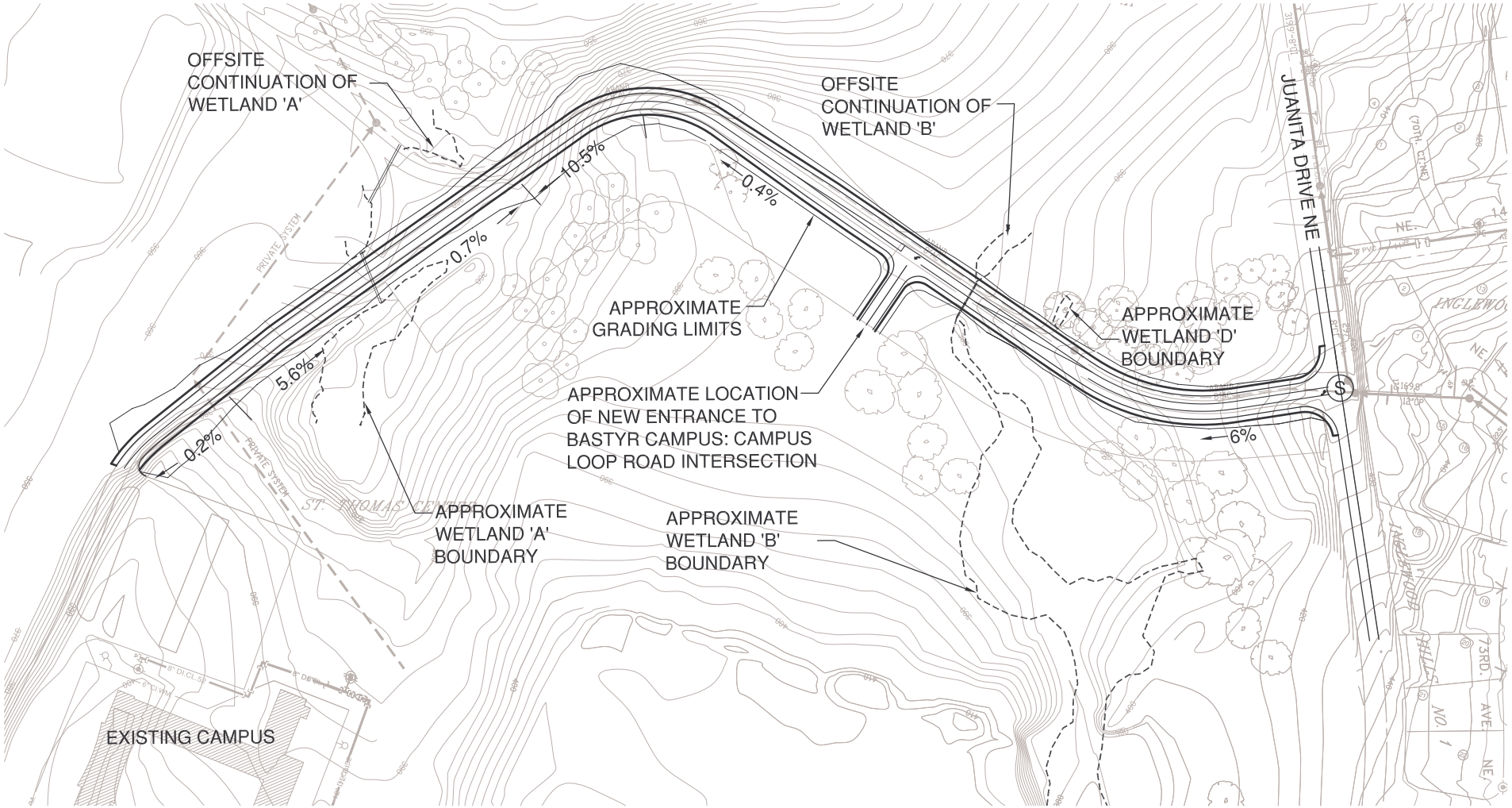
1.6 Alternatives to the Proposal

Site plan alternatives are examined in the EIS that would reduce trip generation and parking demand, stormwater management, and encroachment on environmentally sensitive areas compared to the Master Plan proposal (Alternative 1). The University has also included an alternative that would integrate a private onsite residential care facility on the campus. This would generally result in more intensive development than the Campus Master Plan. These alternatives constitute the range of development intensity and potential uses addressed in this environmental review document. If project-specific development proposals are submitted for uses or parameters that are outside of the range evaluated herein, supplemental environmental review may be required.

Alternative 2: Reduced Low-Density Housing

Alternative 2 differs from the Master Plan proposal (Alternative 1) in that two clusters of Low-Density Housing would be eliminated from the north end of the site (Figure 1.6-1). This would reduce clearing and grading requirements in the forested area by approximately 1.9 acres.

Eliminating half of the Low-Density Housing units in Alternative 2 would reduce the number of dwelling units on the site by 45, and the number of onsite parking spaces by approximately 52. It would be necessary for students who would occupy these units under the Master Plan proposal to find housing elsewhere in the community and commute to the site. The trip generation estimate for Alternative 2 would be approximately 150 trips per day greater than with Alternative 1, with 7 more trips occurring during the PM peak hour. This difference in trip generation would likely be imperceptible to other users on Juanita Drive NE.



kpff Consulting Engineers
101 Stewart Street, Suite 800
Seattle, Washington 98101
(206) 382-0600 Fax (206) 382-0500
09/13/04 NOT TO SCALE

NOTE:

ROADWAY SECTION ILLUSTRATED INCLUDES 11-FT WIDE TURN LANE, TWO 12-FT DIRECTIONAL LANES, AND TWO 8-FT WIDE SHOULDERS. CURB GUTTER AND SIDEWALK NOT YET CONFIRMED.

Figure 1.5-4.
Prospective Improvements to NE 145th Street
Bastyr University Campus Master Plan EIS

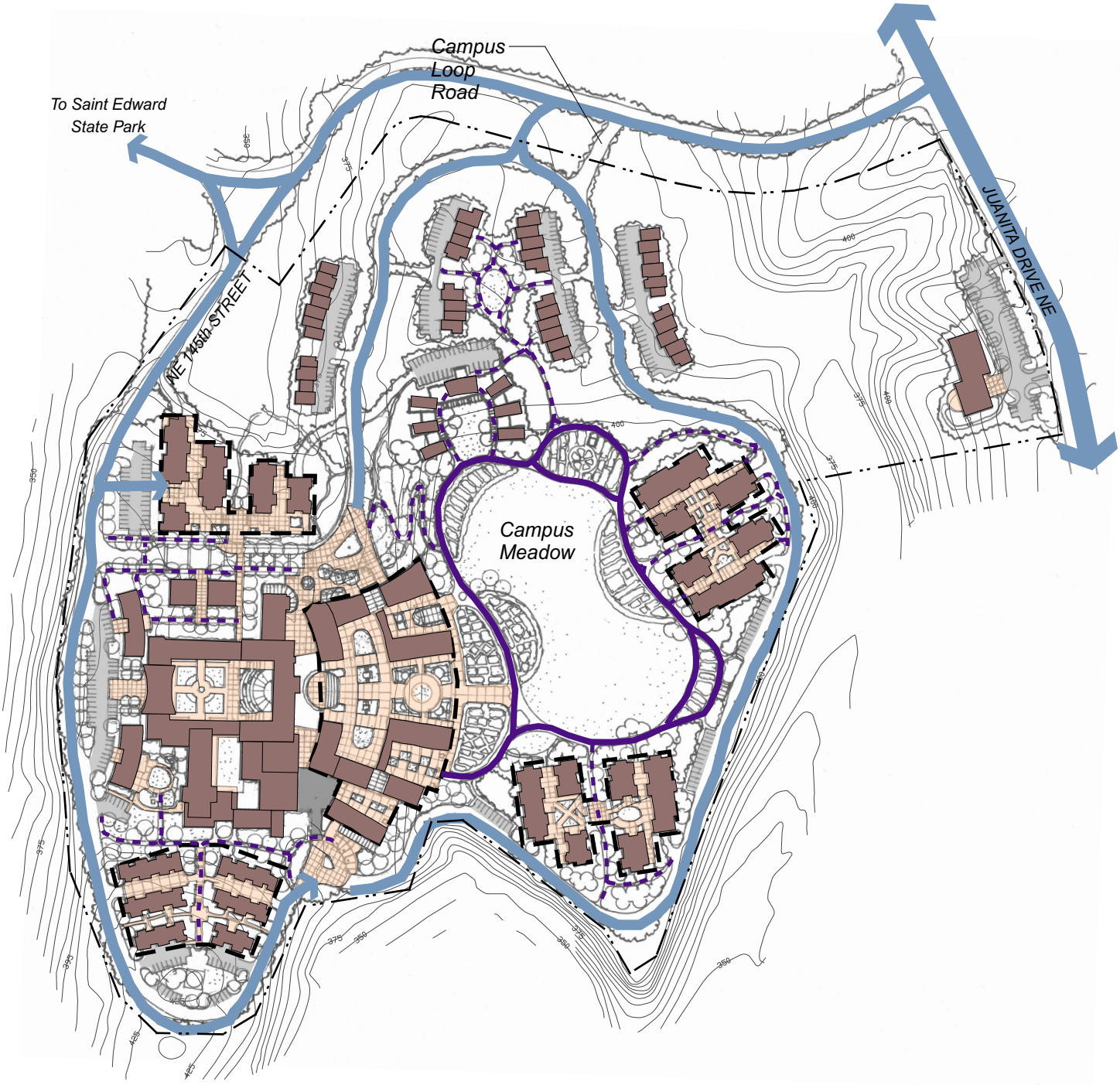
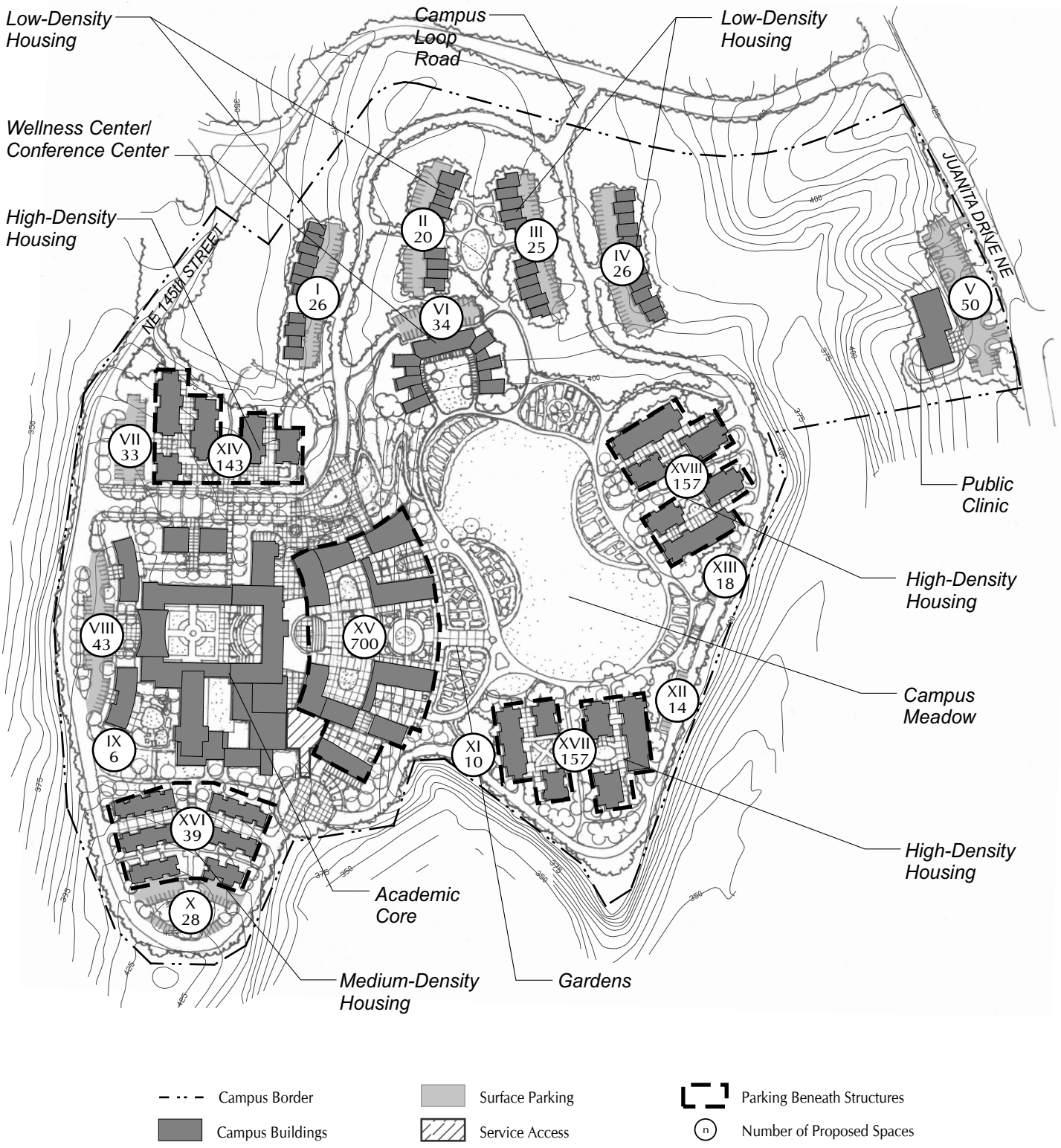


Figure 1.5-5.
Proposed Circulation Plan

Bastyr University Campus Master Plan EIS

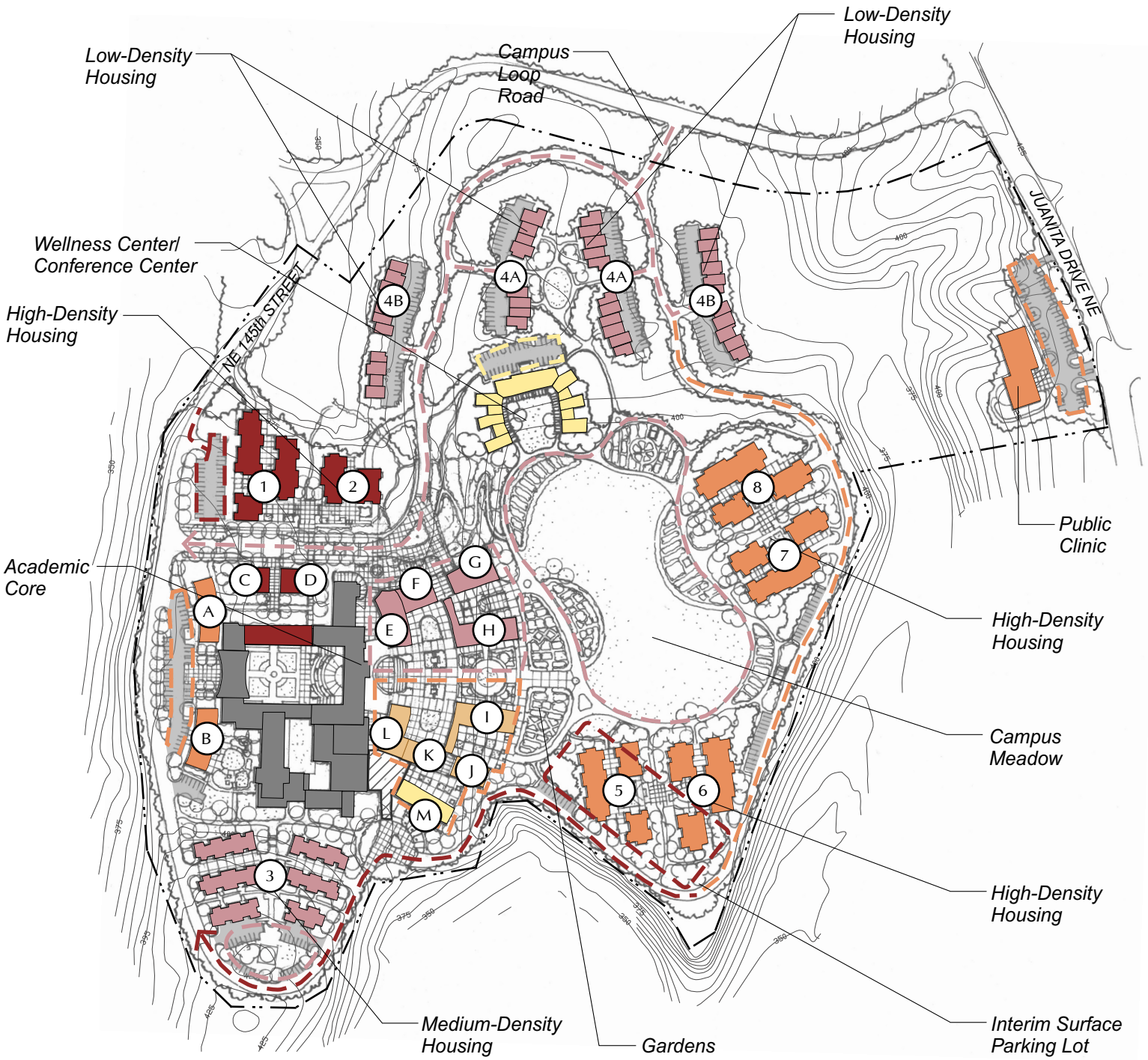
Map prepared by MIG, Inc. - November, 2004



Map prepared by MIG, Inc. - November, 2004

Figure 1.5-6.
Proposed Parking Key Map

Bastyr University Campus Master Plan EIS



Map prepared by MIG, Inc. - November 2004

Figure 1.5-7. Phasing Concept

Bastyr University Campus Master Plan EIS

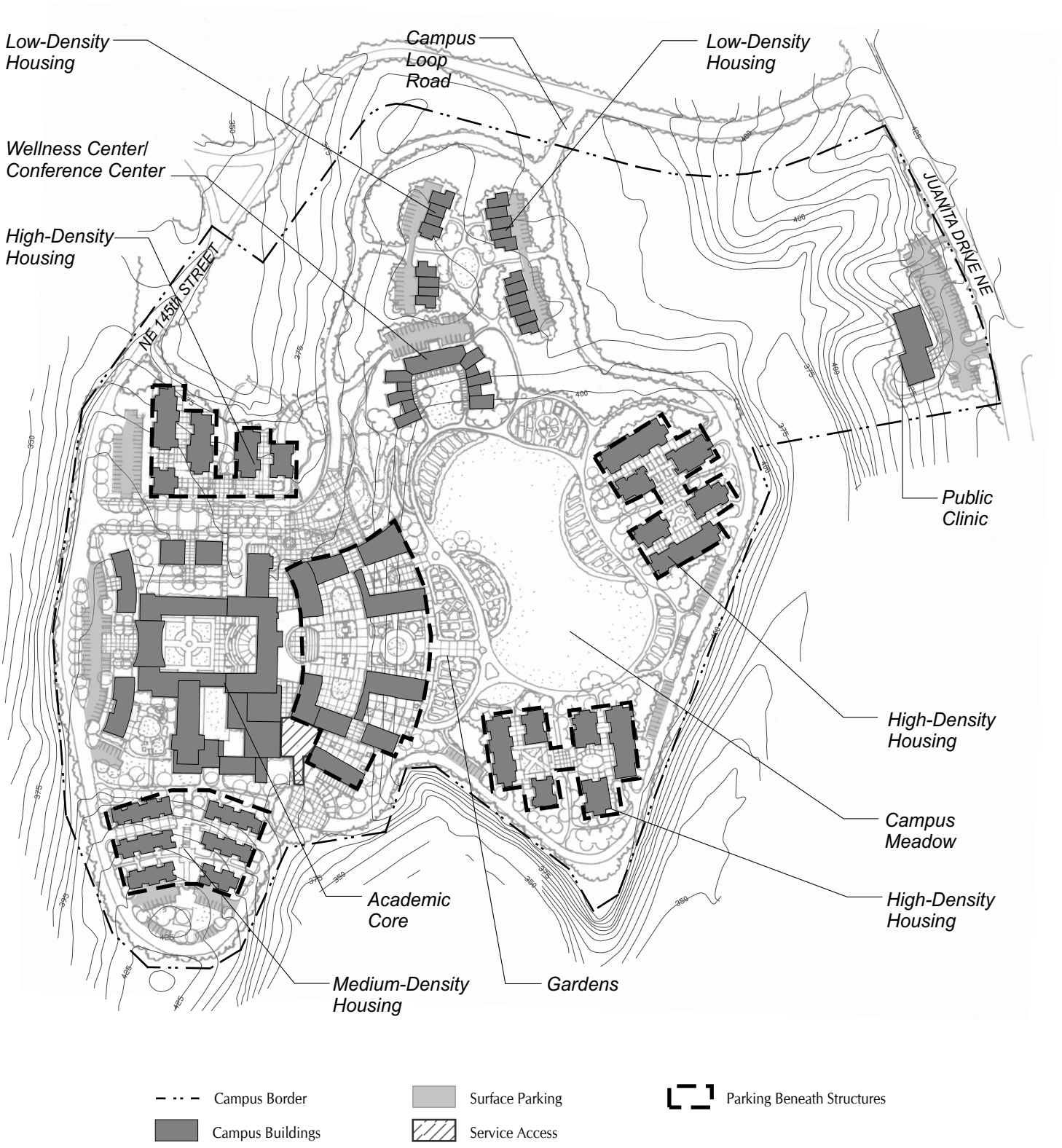


Figure 1.6-1.
Alternative 2:
Reduced Low-Density Housing

Map prepared by MIG, Inc. - November, 2004

Alternative 3: No Public Clinic

Alternative 3 differs from the Master Plan proposal (Alternative 1) in that the Public Clinic would not be constructed along the west side of Juanita Drive NE (Figure 1.6-2). This would avoid clearing and grading the wooded area adjacent to the roadway; constructing separate stormwater detention and treatment facilities and extending other utilities; generating trips associated new driveway access along the west side of Juanita Drive NE; and introducing lighting associated with a two-story structure at a location that is presently forested. Forest vegetation removal from the site would be approximately 1.4 acres less with Alternative 3 than with Alternative 1.

Eliminating the Public Clinic in Alternative 3 would reduce the number of onsite parking spaces by 50, though these would be geographically isolated from general campus use. The trip generation estimate for Alternative 3 would be approximately 240 trips per day fewer than with Alternative 1, with approximately 31 fewer trips occurring during the PM peak hour.

Alternative 4: Private Residential Care Facility

Bastyr University may at some future time consider constructing a residential medical care facility on the campus in lieu of some housing clusters and the Wellness Center/Conference Center in the northern portion of the site (Figure 1.6-3). The University might operate the facility itself or as a collaborative effort with a partner organization.

The private residential care facility concept envisioned for the Bastyr University campus would be relatively small for an in-patient care facility, and would be solely focused on specialty care related to the practice of natural medicine. Typical conditions that might be treated include cancer, diabetes, and obesity. The facility would likely offer narrowly-focused surgical and imaging services, but would not provide emergency or trauma care normally associated with a community hospital. If developed, the private residential care facility would significantly expand clinical program opportunities on the campus, and would provide an advantageous context for advanced research in the natural health sciences.

For purposes of environmental review, the development scenario for a facility of this type is assumed to require approximately 210,000 sf in gross floor area, which could be accommodated in a structure up to five stories in height. An additional parking structure for up to 500 cars would likely be provided with this use. The forest clearing and grading requirements for the private residential care facility as shown on the Alternative 4 conceptual site plan would be approximately 7.3 acres overall.

It is likely that the Private Residential Care Facility use would be located in the northeastern portion of the site, in place of some of the Low-Density Housing clusters, High-Density Housing clusters, and/or the Wellness Center/Conference Center. On-campus housing would be altered from the Master Plan proposal by eliminating all Low-Density Housing units from the north end of the site, and two High-Density Housing clusters in the area where the Private Residential Care Facility would be constructed.

A use of this magnitude, with this number of changes from the Master Plan proposal, would likely result in the University revising the phasing proposal for other planned improvements under the Campus Master Plan.

Because there is no specific residential care facility proposal at the time of this writing, the actual number of patients, staff, and visitors cannot be specifically quantified or projected. Similarly, the year in which a facility of this type might locate to the site is unknown, as are the hours of operation, the hours during which shift changes would occur, and other factors that affect trip generation and traffic volume impacts on the area roadway system. For this reason, no attempt is made in this EIS to quantity offsite transportation system impacts or mitigation requirements. If a residential care facility is proposed for the Bastyr University campus at some future time, it would likely require supplemental environmental review.

Alternative 5: No-Action Alternative

Under the No-Action Alternative, Bastyr University would not exercise its option to purchase the Saint Thomas Center site. If the University is unable to achieve its 25-year vision for growth and development on this campus, it would be necessary to find a new site to which the institution could relocate. Future use of the Saint Thomas Center site would then be determined by the Catholic Archdiocese of Seattle, or by some other prospective purchaser, working with the City of Kenmore to achieve consistency with applicable land use, zoning, and development regulations. The current level of use of the site would continue for the short-term (Figure 1.6-4).

If it became apparent that the University needed to relocate from the Saint Thomas Center site, it could take 3 to 5 years to find a suitable alternative site and secure all necessary permits and approvals. If this occurred, the University would continue to operate at its present location during this interim period. No capital improvements to buildings or infrastructure would be made. Parking would continue to be a site constraint. Use of the ball fields by community leagues would likely continue in the short-term.

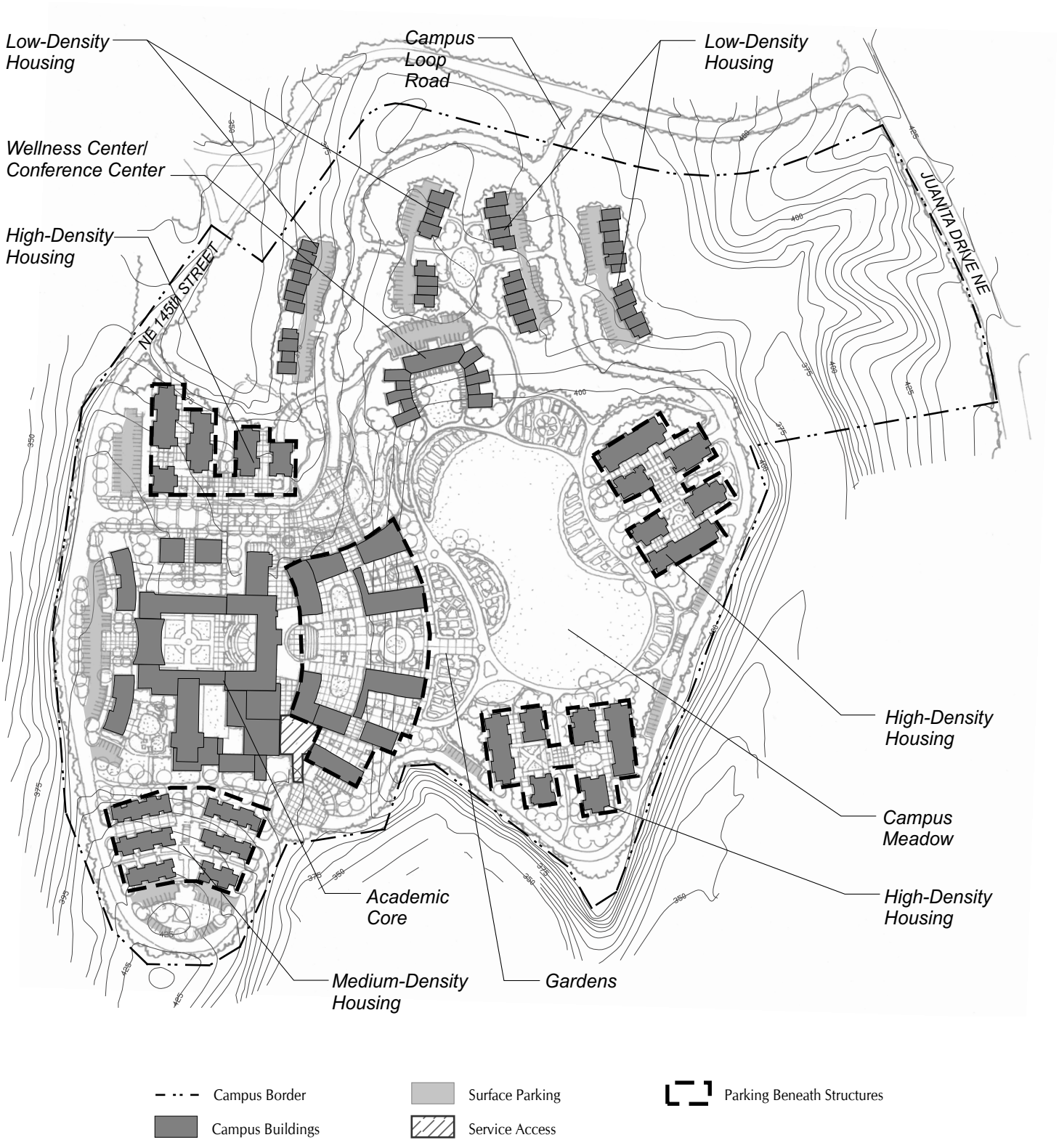
Subsequent use of the site by others could include some other institution(s), or possibly housing. At the time of this writing, future development of the site under the No-Action Alternative is unclear. For this reason, generally only qualitative comparisons are made between the No-Action Alternative and the Master Plan proposal.

Alternatives Considered and Eliminated

Various design concept alternatives, use alternatives, and access alternatives were considered during preparation of the Campus Master Plan that, for various reasons, were eliminated from further consideration. These alternatives and reasons for their elimination are described in Draft EIS Subsection 2.7.5

1.7 Potential Impacts

One of the University's goals in preparing the Campus Master Plan was to preserve and enhance the natural environment of the Saint Thomas site. As a result, no significant adverse environmental effects associated with implementing the Master Plan were identified that could not reasonably be mitigated. The summary of potential impacts below describes the possible effects of site development under the Master Plan proposal or any site plan alternative (i.e., Alternatives 1 through 4). For most elements of the environment, there would not be a substantial difference in impact between the variations in project elements indicated on the conceptual site plans. Where there are prospective quantitative distinctions, these are presented in Draft EIS Section 2.9, *Comparison of Environmental Impacts*. Chapter 3 of the Draft EIS, *Affected Environment, Potential Impacts, and Mitigation Measures*, provides details on the potential impacts summarized below, and on mitigation measures incorporated into Plan features, required by applicable regulations and commitments, or otherwise recommended.



Map prepared by MIG, Inc. - November, 2004

Figure 1.6-2.
Alternative 3: No Public Clinic

Bastyr University Campus Master Plan EIS

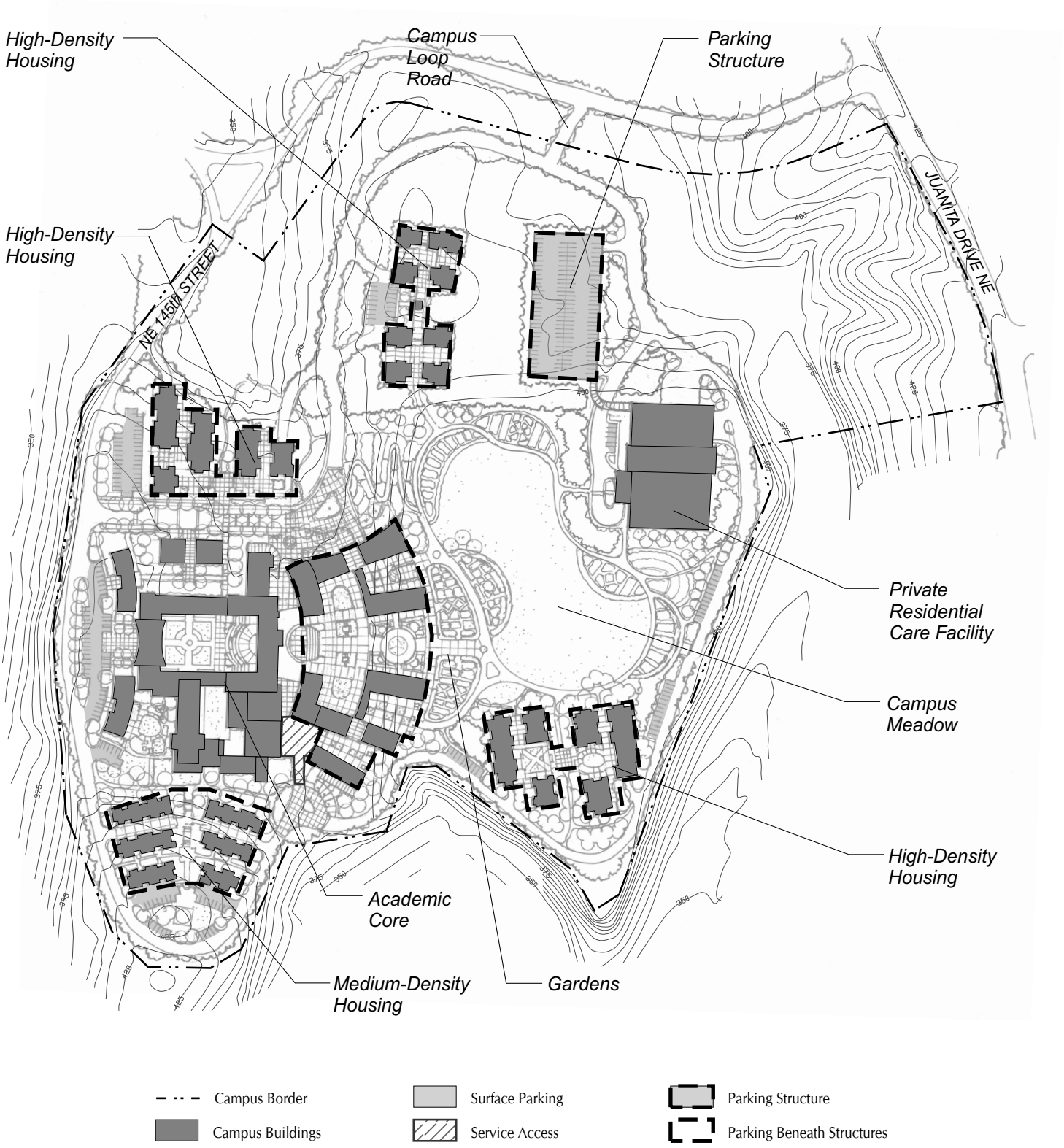


Figure 1.6-3.
Alternative 4:
Private Residential Care Facility

Bastyr University Campus Master Plan EIS

Map prepared by MIG, Inc. - November, 2004

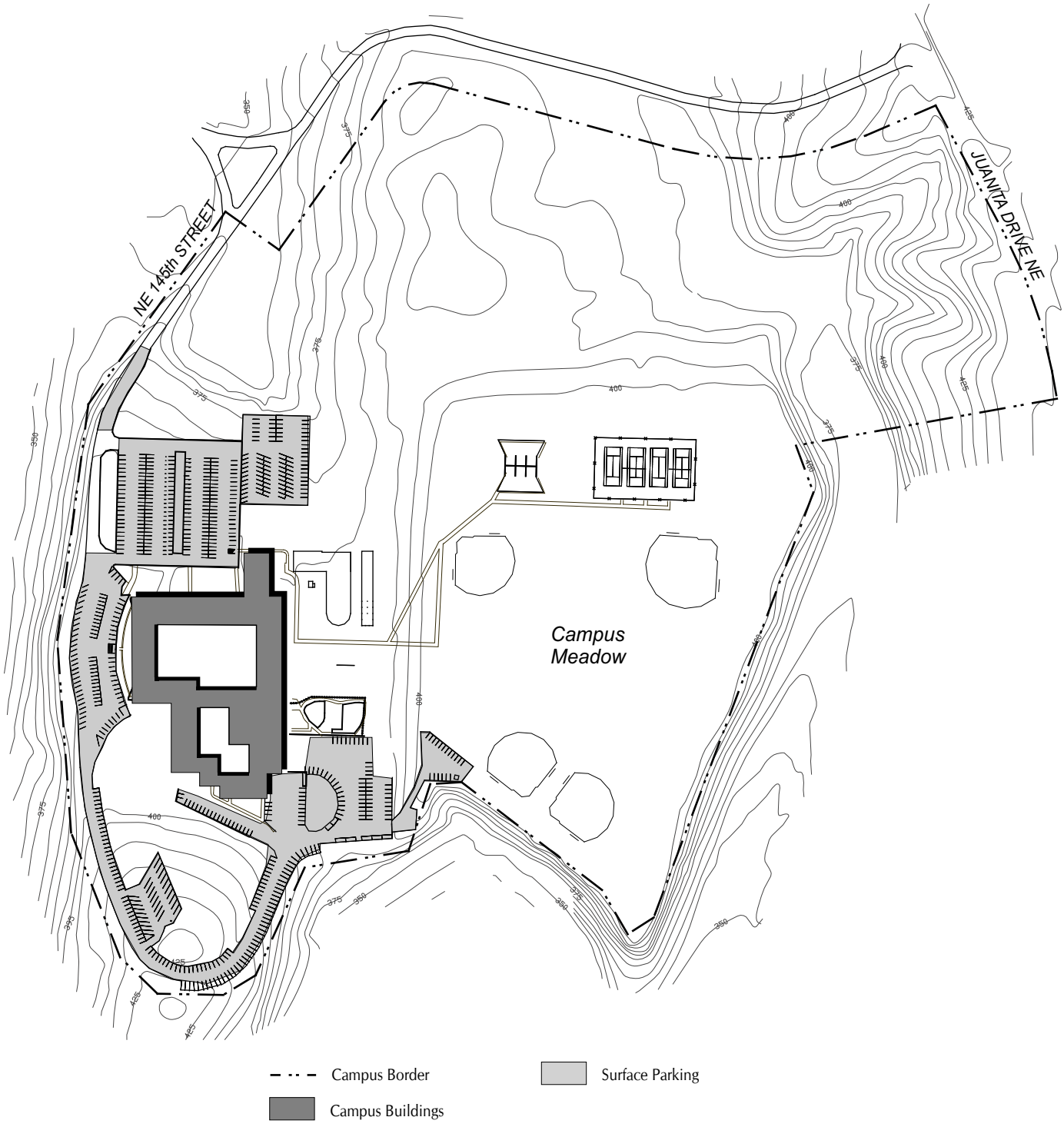


Figure 1.6-4.
Current (2003) Level of Use

Map prepared by MIG, Inc. - November, 2004

Bastyr University Campus Master Plan EIS

1.7.1 Earth

If the proposed campus loop road remains in close proximity to the southern edge of the property near the top of steep slopes as illustrated on conceptual site plans, construction would pose the risk of causing slope instability.

Project components (buildings, utilities, and/or the campus loop road) could be impacted by instability or damage due to soil creep or slope instability if constructed too close to slopes.

Site development would expose soils to erosion by wind or precipitation. With required construction stormwater management measures and Best Management Practices in place, adverse impacts should not be significant, unless one or more of these measures were to fail during a major storm event. Sediments in site runoff could adversely affect water quality and aquatic habitat in receiving streams and wetlands.

If stormwater infiltration is required, there could be risk of slope instability if infiltration facilities were located in close proximity to steep hillsides, and/or if infiltrated water moved across the subsurface till layer to exposed slopes.

1.7.2 Water

Construction activities associated with widening NE 145th Street would involve work within two ephemeral (seasonal) streams: the tributary to Inglewood Creek, and Tributary #0225. It would be necessary to extend existing culverts beneath the roadway to accommodate up to 15 to 20 feet of additional of road-prism width on each side. Site preparations and culvert installations would likely disturb sediments in the stream channel. If it was necessary to perform this work when there is flow in the stream channels, disturbed material could be transported downstream where it could adversely affect pool depth, deposit fines over fish spawning gravel beds at the mouth of the stream, and adversely affect hydrology in lower stream sections.

Use of construction equipment that utilizes petroleum-based fuels and lubricants would present potential water quality risks to local streams, particularly where work (such as road widening) would involve work directly in streams.

Potential adverse effects in the form of surface water runoff quantity and quality may occur in some proportion to the amount of impervious surface added to the site, particularly during and as a result of storm events that exceed design criteria for stormwater management facilities.

Stormwater quality treatment measures designed in accordance with current regulations would treat 60 percent of the 2-year peak storm event for developed land cover. These measures would be effective in treating the “first flush” of sediments and contaminants from impervious surfaces. Higher flows would be diverted from water quality treatment facilities and detained to control the rate of release of runoff from the site to approximately correspond to pre-development conditions.

If the Natural Discharge Location Adjustment requested by the University was not granted, there would likely be negative impacts to existing surface water conveyance systems in the form of a change in the quantity of water discharged to each basin, and consequent changes in the hydroperiod that supports existing vegetation communities associated with the drainage courses and wetlands. These potential changes to the hydroperiod could result in stressing or killing riparian and wetland vegetation, and stressing invertebrate populations that provide food for fish.

If the Flow Control Adjustment request was not granted, stormwater detention requirements would more than double (to approximately 13.5 acre feet), which would likely be prohibitive to the University being able to achieve its campus expansion objectives on the site.

1.7.3 Plants and Animals

1.7.3.1 Wetlands

Construction-related impacts could occur in four of the five wetlands or their buffers identified on or near the Bastyr University site. Only Wetland C would be unaffected by the Master Plan proposal.

- The proposed widening of NE 145th Street would likely impact Wetlands A, B, and D and their associated buffers through clearing grading and construction of the new road prism.
- Campus loop road construction may encroach into the Wetland B and Wetland E buffers.
- Construction of the Low-Density Housing clusters proposed west of Wetland B may encroach into this wetland buffer.
- Construction of High-Density Housing Clusters 1 and 2 in the area of what is currently the north parking lot, and Low-Density Housing east of Wetland A would likely impact buffers associated with Wetland A through clearing, grading and introduction of the structures.

Wetlands could potentially be reduced in size as a result of reduced hydrology due to the increase in impervious surfaces and the creation of stormwater detention facilities.

If the University's Flow Control Adjustment request is not approved (i.e., if stormwater management is required to be based on the pre-1957 forested condition of the site, versus the 1995 developed condition), the quantity of water discharged from detention facilities, and the timing of delivery of stormwater to streams and wetlands, particularly to Wetland A, would change. In general, because more stormwater would be required to be detained, water delivery to the wetland would be slower, over a longer period of time. Potentially less water would reach Wetland A, which would result in the loss of wetland vegetation and a change in wetland area. Wetland B would likely not be significantly impacted since the wetland appears to be sustained by groundwater and surface water flows runoff from Juanita Drive NE.

1.7.3.2 Vegetation

Preliminary calculations of forest vegetation removal that would occur to implement the Master Plan proposal or site plan alternatives are provided in Draft EIS Table 2.8.3-1. Estimates range from 7.3 to 10.1 acres based on the conceptual site plans provided.

A potential secondary impact of proposed forest clearing could be colonization of disturbed and newly developed areas of the site by invasive plant species.

1.7.3.3 Wildlife Habitat

Potential construction-related impacts to species of concern and other wildlife species would likely be caused by both habitat removal and disturbances associated with construction (e.g., noise, light, and an increase in human activity on the site).

Because campus expansion is proposed in phases over a period of 25 years, construction-related impacts to the native vegetation would occur gradually. This may allow some bird and wildlife species to relocate into remaining natural areas as space allows, minimizing some direct impacts to wildlife.

Smaller forest-dwelling species, especially those that rely on concealment (e.g., terrestrial salamanders, small mammals, and snakes) would likely be displaced or extirpated from forested areas that would be cleared. More mobile species such as bald eagles and larger mammals making use of the forested habitat in or near construction areas would be displaced as a result of construction-related noise, activity, and the visual presence of construction workers. Displacement may increase chances of predation and/or territorial disputes in nearby areas. Displacement due to habitat loss could also reduce reproductive success to the extent that nests, dens, and breeding sites would be lost. Sublethal effects (i.e., decreased survivorship and decreased reproduction) due to the stress of displacement may also occur. Over the course of phased development of the site, some species or individuals may habituate to the increased noise and activity levels.

If nighttime construction is occasionally unavoidable, prolonged periods of illumination could temporarily displace nocturnal species in the surrounding habitat.

Increased traffic associated with expansion of the University campus and access roads would increase onsite noise levels and human activity in the developed condition of the site above existing levels, with resultant disturbance or displacement effects on some wildlife.

More urban species, such as mice, rats, raccoons, and/or opossums, may increase in population in the developed condition of the site as a result of increased human use.

1.7.3.4 Fish

The relative effect of the campus expansion proposal on fish that may use stream-mouth habitat along the northeast shoreline of Lake Washington would be directly related to stormwater quantity and quality. The City's stormwater management regulations are intended to effectively detain and treat runoff before it reaches receiving waterbodies, thereby minimizing impacts that could occur from increased urbanization of the site.

It is difficult to replicate the function of natural systems with stormwater detention and controlled release from detention facilities. However, since salmonid spawning is neither significantly present nor used in the four "supportive" tributaries that receive site runoff, no adverse modifications to spawning gravels or pools is predicted to occur as a result of the operation of stormwater management facilities that would be provided with the Master Plan proposal or site plan alternatives.

1.7.4 Environmental Health

It is likely that asbestos-containing building materials and potentially lead-based paint would be encountered during renovation of the existing main building on the campus.

Conceptual site plans for the Master Plan proposal or alternatives indicate that excavation would occur in the vicinity of the site heating oil USTs. Petroleum hydrocarbons or other contaminants may be encountered during earthwork activities in areas near fuel oil storage tanks.

Excavation and new construction is proposed around the perimeter of the historical fill that created the central meadow. If any contamination is present in fill soils disturbed by these excavations, it could be encountered during construction.

1.7.5 Land Use

1.7.5.1 Existing Land Use and Aesthetics

The central core of the Bastyr University campus is not visible from adjoining properties due to dense screening by mature forest vegetation; therefore, potential impacts associated with construction of most Campus Master Plan improvements would not be noticeable except to University students, faculty, staff and visitors, and to some Saint Edward Park visitors.

Forest clearing to construct the Public Clinic under Alternative 1 or 2 would result in a change in the appearance of the portion of the site that fronts along the west side of Juanita Drive NE. Approximately 1.4 acres of mixed coniferous/deciduous forest would be removed and replaced by a two-story structure and parking lot for approximately 50 vehicles.

During construction, noise, dust, construction vehicle trips, and dirt tracked onto NE 145th Street and Juanita Drive NE may be impacts apparent to the adjacent community.

The Public Clinic, if constructed under Alternative 1 or 2, would introduce a two-story medical office building along the west side of Juanita Drive NE, similar in character to the existing neighborhood commercial use (Inglewood Village) and medical offices (Inglewood Professional Center) near the intersection of NE 141st Street (Holmes Point Drive NE) with Juanita Drive NE.

Intensified uses on the Bastyr University campus would lead to greater activity levels on site and in the vicinity, as the growing campus population would use local roadways, nearby commercial centers, recreational facilities, and other community features. None of the proposed uses is expected to be a nuisance in terms of noise generation, excessive illumination, odors or other emissions to the air, given the nature of the institutional use. Based on these characteristics and the substantial mature forest buffer, it is reasonable to assume that the Bastyr University campus expansion would not result in land use incompatibilities.

1.7.5.2 Light and Glare

It is likely that nighttime security lighting would be provided on construction sites within the campus over the 25-year period of campus expansion implementation. It is doubtful that area residents east of Juanita Drive NE, or motorists on Juanita Drive NE, would directly observe illumination on construction sites within the campus, with the exception of the Public Clinic site under Alternative 1 or 2.

Construction sites at the north end of the campus would likely be visible to Saint Edward Park users following forest vegetation removal in this area to construct the campus loop road intersection with NE 145th Street; however, park users leave the area by 8:00 PM, due to closure at that hour.

1.7.5.3 Historic Structures

No substantive modifications are proposed to the appearance or configuration of the Saint Thomas building, colonnade entrance, or chapel; however, the structure would be subject to construction disturbance during renovation to bring it into compliance with seismic, structural, and building code

requirements; replace roofing; upgrade windows, electrical, plumbing, and mechanical systems; and make interior improvements.

1.7.5.4 Relationship to Plans, Policies and Regulations

The City of Kenmore Comprehensive Plan consists of a series of Elements addressing the City's vision, goals, policies, land use and capital improvement plans, consistent with the provisions of the Washington State Growth Management Act (GMA). The Plan guides City decision-makers regarding ordinances, regulations, and capital investments to implement the vision, goals, policies, and various plans. The relationship of the Campus Master Plan proposal to each applicable Comprehensive Plan element is described below. (The Downtown and Shoreline Subelements are not applicable to the site.)

The campus expansion proposal would be generally consistent with the Kenmore Comprehensive Plan **Vision** by:

- Furthering the City's vision to provide continuing education opportunities and quality employment opportunities.
- Seeking to avoid impacts to the natural environment, including environmentally-sensitive areas such as steep slopes, wetlands, and streams.
- Ensuring that development would occur in accordance with transportation levels of service acceptable to the City, an adequate supply of onsite parking, provisions for public safety, and appropriate roadway design standards.
- Providing passive recreational opportunities on the site.
- Complying with City park impact fees (or other means specified in the Planned Action Ordinance and/or Development Agreement) to address the impacts of the on-campus resident population on Kenmore public parks and recreational facilities.

The Campus Master Plan and subsequent Planned Action Ordinance and/or Development Agreement would implement the **Land Use Element** by:

- Relying on a master plan to develop allowable uses and standards for the Public/Private Institution designation.
- Creating an implementing zone.
- Engaging the public and other agencies in the consideration of potential Comprehensive Plan amendments and development regulation changes, through the public involvement opportunities associated with environmental review and City Council action on the proposal.
- Retaining the perimeter buffer of forest vegetation, and advocating building heights that would not exceed the height of existing trees to maintain land use compatibility with surrounding park and residential uses.
- Implementing necessary road and utility improvements through coordination with service providers.
- Making various uses on the campus open to the general public; i.e., the University Gardens, a Public Clinic (Alternatives 1 or 2), a Wellness/Conference Center (Alternatives 1, 2, or 3), and/or the Private Residential Care Facility (Alternative 4).

Community Design Subelement:

- Protecting critical areas (steep slopes, wetlands, and streams).
- Retaining the Saint Thomas building for its cultural and potentially historic features.
- Providing onsite open space including extensive gardens and landscaping.

- Providing pedestrian/bicycle pathway connections to the Saint Edward park and Juanita Drive NE
- Retaining a forested buffer around the site perimeter.
- Retaining the forested buffer would also retain the current gateway character on the south approach to Kenmore.
- Constructing clustered housing on the site to reduce offsite automobile trips.
- Providing structured parking and clustered campus buildings to maximize the retention of onsite open space and forested buffers, and to minimize stormwater detention and water quality treatment requirements.
- Promoting efficient use of renewable resources through clustering development on the site.

Consideration should be given locating parking behind the proposed Public Clinic building or incorporating other design features on the site to be consistent with City policy to promote less auto-oriented design.

Natural Environment Subelement:

- Providing onsite housing to reduce vehicle trips, thereby reducing emissions to the air.
- Maintaining forested buffers to minimize offsite impacts in the form of noise, light and glare impacts.
- Seeking to avoid impacts to the natural environment, including environmentally-sensitive areas such as steep slopes, wetlands, and streams.
- Mitigating wetland impacts associated with road widening requirements.

Economic Development Subelement:

- Strengthening the City's economy.
- Retaining and expanding the University as a key community employer and community asset.

The Campus Master Plan would be consistent with the **Housing Element** of the Comprehensive Plan by:

- Providing a variety of housing in the community; i.e., clustered on-campus attached dwellings to be occupied by students and faculty.
- Minimizing offsite housing demand by providing on-campus housing for a portion of students, faculty and staff.
- Incorporating design principles in the Planned Action Ordinance and/or Development Agreement to guide the development of housing units consistent with the Kenmore Municipal Code.

The Campus Master Plan would implement the **Transportation Element** by:

- Installing a traffic signal at the intersection of NE 145th Street with Juanita Drive NE.
- Complying with the transportation mitigation requirements identified in this Draft EIS (Section 3.6); City code regulations that would ensure development would occur in accordance with acceptable levels of service, an adequate supply of onsite parking, provisions for public safety, and appropriate roadway design standards; and with the specific provisions of the Planned Action Ordinance and/or Development Agreement.

The Campus Master Plan proposal would be consistent with the **Parks and Open Space Element** by:

- Providing trail linkages to parks and visual access to critical areas.
- Avoiding impacts to informal trail systems that connect large, regional parks in the vicinity (e.g., the "tie-trail" between Saint Edward Park with Big Finn Hill Park).
- Providing substantial open space for passive recreation and enjoyment by campus users.
- Paying City park mitigation fees for campus population use of city parks and recreational facilities, if required as an element of the Planned Action Ordinance and/or Development Agreement.
- Making various uses on the campus open to the general public; i.e., the University Gardens, a Public Clinic (Alternatives 1 or 2), a Wellness/Conference Center (Alternatives 1, 2, or 3), and/or the Private Residential Care Facility (Alternative 4).

The Campus Master Plan would implement the **Surface Water Element** by:

- Incorporating stormwater management facilities consistent with City of Kenmore and King County stormwater management regulations.
- Providing structured parking and underground vaults (for at least a portion of stormwater management facilities) for stormwater detention to minimize the use of developable land, and preserve open space and garden areas among additional buildings.

The campus expansion proposal would implement the **Public Services Element** by:

- Making adequate provisions for emergency services, particularly secondary emergency vehicle access to/from the site.
- Implementing growth at a rate that would not adversely impact existing levels of service provided by police and fire departments, public schools, and parks.
- Providing higher education opportunities within the Kenmore community.

The Campus Master Plan would be consistent with the **Utilities Element** by:

- Ensuring the provision of adequate water supply, sewage collection, stormwater management, natural gas, electrical power, communications, and solid waste collection services to the expanded campus.
- Providing a concentration of housing that could be served by transit.
- Conserving energy and building materials through retaining and reusing the Saint Thomas building.

The campus expansion proposal would be consistent with the **Capital Facilities Element** by:

- Proposing on-campus population growth at a rate consistent with the year 2020 population projections for the campus evaluated in the City-wide Comprehensive Plan.
- Participating in a proportional-share cost of implementing planned offsite transportation improvement projects.
- Complying with City requirements for transportation concurrency and acceptable levels of service on offsite roadways and intersections.
- Implementing growth at a rate that would not adversely impact existing levels of service provided by police and fire departments, public schools, and parks.

At the time of the next City of Kenmore Comprehensive Land Use plan update, it will be necessary to update planning for capital facilities with the Bastyr University Campus Master Plan growth assumptions.

1.7.6 Transportation and Parking

1.7.6.1 Roadway Network

Construction-related traffic impacts due to roadway network changes included in the campus expansion proposal would occur intermittently during the first three planned phases of development (2006–2020).

The peak number of construction-related vehicles would occur during periods when buildings would be constructed on the site.

A new campus loop road would be constructed that would provide internal vehicle circulation on the expanded campus.

NE 145th Street would be widened between Juanita Drive NE and the new campus loop roadway to provide walkways, left-turn pockets, and a shoulder or separate pedestrian pathway.

The University proposes to install a new traffic signal at the NE 145th Street/Juanita Drive NE intersection, with appropriate north-to-westbound and east-to-northbound turn pockets.

1.7.6.2 Traffic Volumes

Construction-related trips (approximately 50 trips per day) that would be generated intermittently over a period of 25 years by the delivery of building materials and the construction of buildings would constitute 2 percent or less of daily roadway volume on Juanita Drive NE.

At full build-out, the Master Plan proposal is projected to generate a total of approximately 5,740 trips on an average weekday, with about 660 trips occurring in the AM peak hour and about 574 occurring in the PM peak hour. This would constitute a net increase in trips on the order of approximately 2,900 daily trips, 350 AM peak hour trips, and 304 PM peak hour trips compared to existing conditions.

1.7.6.3 Traffic Operations

Most study area intersection levels of service would remain the same with the Master Plan proposal as without.

The NE 170th Street/Juanita Drive NE intersection is projected to operate at LOS E and the NE 122nd Street/Holmes Point Drive NE/Juanita Drive NE intersection is projected to operate at LOS D during the PM peak hour with the Master Plan proposal. These levels of service are considered acceptable by the City of Kenmore.

The NE 145th Street/Juanita Drive NE intersection is projected to operate at LOS B during the PM peak hour as a signalized intersection, an improvement from LOS F conditions without the project.

The Master Plan proposal would add trips to two signalized intersections that are projected to operate at LOS F in 2020 without the project. These trips are projected to add an average of between 8.3 and 9.9 seconds of delay per vehicle to these intersections during the PM peak hour. This corresponds to delay increases ranging from 3.7 percent to 4.5 percent.

The greatest trip increases would occur with Phases 4 and 5 (2021–2030), when no additional onsite housing would be constructed.

The transportation impact analysis prepared for this EIS suggests that further widening of Juanita Drive NE (i.e., in addition to the proposed westbound left-turn pocket), near Bastyr University, would not be needed to accommodate the Master Plan proposal or any site plan alternative.

1.7.6.4 Site Access

The campus loop road is proposed as a private roadway: a rural, two-lane roadway with shoulders and grass-lined swales on each side, with a stop sign-controlled intersection with NE 145th Street.

The campus loop road intersection with NE 145th Street, approximately 700 feet west of Juanita Drive NE, may have outbound sight distance constraints, due to a sharp west horizontal curve in NE 145th Street.

All movements at the NE 145th Street/campus loop road intersection are projected to operate at LOS B or better during the PM peak hour in 2020.

The Public Clinic driveway locations shown on conceptual site plans for Alternative 1 or 2 would occur on the inside of a horizontal curve on Juanita Drive NE, with insufficient sight distance for safe operations. Required modifications are described below under Mitigation Measures.

1.7.6.5 Parking

The Master Plan proposal includes more than doubling the onsite parking supply to about 1,529 spaces – 1,479 spaces are proposed on-campus, and 50 spaces are proposed at the Public Clinic on Juanita Drive NE. Most parking spaces are proposed within parking structures under proposed housing clusters and in a main parking garage near the academic core. A limited amount of parking is proposed in surface parking lots located throughout the campus.

The parking analysis performed for this EIS indicates that parking demand generated by the Master Plan proposal could exceed the proposed parking supply at full build-out if commuters continue to come to the site as they were in 2003, and if all students and families living onsite have a vehicle to park.

1.7.6.6 Traffic Safety

Additional traffic generated by campus expansion could increase the likelihood of accidents within the study area.

Rear-end accidents could increase on Juanita Drive NE in the vicinity of NE 145th Street, particularly when the proposed signal is first installed.

1.7.6.7 Transit Facilities and Service

Construction of roadway improvements (i.e., widening NE 145th Street and installing a traffic signal at the NE 145th Street/Juanita Drive NE intersection) could cause temporary delays or interruptions to transit service to and from Bastyr University.

Additional students, faculty, and staff traveling to/from Bastyr University under the campus expansion proposal are anticipated to increase the number of transit riders in the future.

1.7.6.8 Non-Motorized Transportation Facilities

Construction of roadway improvements (i.e., widening NE 145th Street and installing a traffic signal at the NE 145th Street/Juanita Drive NE intersection) could cause temporary interruptions to non-motorized transportation (e.g., bicycles and pedestrians) to and from Bastyr University.

No adverse impacts to non-motorized facilities are anticipated in the completed condition of the development; rather, widened road shoulders and pathways would increase ease of access and circulation for bicycles and pedestrians.

1.7.7 Public Services

1.7.7.1 Fire Protection and Emergency Medical Aid Services

During the 25-year construction period of the campus expansion proposal, Northshore Fire Department anticipates that there may be a higher volume of fire and emergency medical aid calls during construction activity, due to safety hazards associated with construction practices, ~~and~~ changing conditions that result in uncertainty for workers onsite and persons traveling through construction areas, and a general increase in traffic volumes across this span of time.

The rate of growth projected to occur with the campus expansion proposal is within the anticipated rate of growth within the Northshore Fire Department service area. ~~and therefore is not expected to adversely impact the~~ No adverse impacts to Fire Protection District No. 16 in terms of demand for manpower or equipment are anticipated based upon current District growth projections.

1.7.7.2 Police Protection Services

The Kenmore Police Department anticipates incidents of theft and vandalism on construction sites, particularly the theft of tools from unlocked trailers, during the 25-year construction period of the campus expansion proposal.

The site plan characteristic most likely to increase the number of calls for police assistance, if any, is the proposal to provide the majority of parking within structures, due to visual screening that tends to result in increased incidences of theft, vehicle prowl, and assaults.

The rate of growth projected to occur with the campus expansion proposal is within the anticipated rate of growth within the City of Kenmore Police Department service area, and therefore is not expected to adversely impact the Department in terms of demand for manpower or equipment.

1.7.8 Utilities

Utility upgrades would be sized in anticipation of full build-out of master planned improvements for the selected site plan alternative. The actual increase in demand for utility services would be phased over the projected 25-year build-out of planned improvements.

1.7.8.1 Water Service

New water distribution and service lines would be required to meet the expanded demand of campus expansion. This would include extending new waterlines to areas currently not served, as well as potentially establishing a looped system with an additional connection to Northshore Utility District (NUD) facilities in Juanita Drive NE.

New building service connections would be provided by development of an onsite distribution system to be constructed under the campus loop road.

It would be necessary to relocate the NUD 12-inch water main prior to construction of High-Density Housing clusters 5, 6, 7 and 8 in Phase 3 (2016–2020). Downstream users could be temporarily without service for limited periods during the work to relocate this water main and install new onsite water service connections.

No project-specific engineering calculations have been performed at this stage of Planned Action review; however, initial discussions with the NUD indicate that the existing 12-inch water main would have capacity to meet future demands of the campus expansion proposal.

All water mains and fire hydrants shall be designed as required and approved by the Fire Department prior to submittal to the water purveyor (NUD). The required fire flow shall also be calculated by the Fire Department. The adequacy of existing available fire flow shall be determined at the time of Building Permit application submittals.

1.7.8.2 Sewer Service

The campus expansion proposal would require extending new sewage collection lines to areas of the campus not presently served by NUD and the onsite sewage collection system. Sewer lines would likely be constructed in the alignment of the campus loop road, with new service connections extended to each building as needed.

The NUD connection that serves the Bastyr University campus only serves this site and Saint Edward Park; therefore, it is likely that all sewer work within the campus, including demolition and construction of new conveyance systems, could be constructed without service interruption to other NUD customers.

Conceptual site plans for the campus expansion proposal show High-Density Housing clusters and academic buildings over the top of the existing onsite private sewer line. Phase 1 development would require relocating this line.

A new NUD sewer connection to the Bastyr University campus would need to be constructed to serve existing and proposed buildings. The new sewer line would require an NUD easement across Washington State Parks land to the Bastyr property boundary.

1.7.8.3 Stormwater Management

New storm water collection infrastructure and water quality treatment facilities would be required to serve the campus expansion proposal. This work would involve excavating trenches, installing pipe, excavating water quality detention and/or treatment ponds, and installing underground vaults. It is likely that new stormwater systems could be installed without impact to the existing stormwater collection infrastructure

on the site, as it is unlikely any of this existing infrastructure would be maintained under any development alternative.

The campus expansion proposal would increase the amount of both pollutant-generating and non-pollutant-generating impervious surfaces on the site (i.e., buildings [rooftops], walkways, roadways, and parking areas). Stormwater detention and water quality treatment facilities are proposed in accordance with applicable City of Kenmore requirements.

At the time of this writing, the University was still in the process of deciding whether onsite stormwater detention would be provided in surface detention ponds, subsurface vaults, or a combination of these features. To the extent that surface detention ponds are used, the developable area of the site may be reduced, thereby potentially reducing the size, location, or number of structures and/or other features illustrated on the conceptual site plans for the Master Plan proposal or alternatives.

The University has requested two variances from City of Kenmore stormwater management regulations: a Natural Discharge Location Adjustment, and a Flow Control Adjustment. Both relate to the fact that the site is not in an undeveloped condition, and that prior development to construct the Saint Thomas Seminary in 1957 significantly altered natural features of the site to which the Natural Discharge Location and Flow Control requirements relate. Detailed discussions of the environmental benefits of approving the stormwater management variances are provided in Draft EIS Sections 2.6.2 *Stormwater Management Proposal*; 3.2.1 *Stream Systems within the Project Area*; 3.2.2, *Groundwater*; 3.3.1 *Wetlands*; and 3.8.3, *Stormwater Management*.

1.7.8.4 Natural Gas Service

As with other utilities, it is likely that new natural gas services would be constructed within the limits of the proposed campus loop road. From this onsite distribution system, service connections could be established to the various individual buildings as constructed.

Conceptual site plans indicate construction of two High-Density Housing clusters in the area of the existing Bastyr natural gas connection. If development approvals are sought for building footprints as shown, it would be necessary to relocate a portion of this line, with possible short-term interruption in service to the structure currently occupied by the University.

The campus expansion proposal would require extending new natural gas lines to areas of the campus not presently served by the system. The onsite distribution system would be sized in anticipation of full build-out of master planned improvements. The actual increase in demand for natural gas would be phased over the projected 25-year build-out of planned improvements.

Preliminary discussions with Puget Sound Energy (PSE) staff indicated that there is adequate capacity within the PSE system to meet the needs of proposed campus expansion.

1.7.8.5 Electrical Service

New onsite electrical distribution and service lines would be required to meet the increased demand of the campus expansion proposal. It would be necessary to extend new infrastructure to areas not currently served, as well as potentially establishing a new connection along NE 145th Street to PSE facilities in Juanita Drive NE.

Any of the site redevelopment alternatives would be expected to require modifications to the existing PSE onsite service location on Holmes Point Drive NE. Because electrical service extended to the Bastyr

University site from Holmes Point Drive NE only serves the University, improvements necessary for campus expansion under any alternative could be implemented without impact to other PSE customers.

Service connections to existing buildings would likely be reestablished from new distribution infrastructure. Electrical service to new facilities would be provided by developing a site distribution system that would likely be constructed beneath the campus loop road. Electrical service to the Public Clinic in Alternative 1 or 2 could be provided from existing PSE facilities in Juanita Drive NE.

The campus expansion proposal is anticipated to require modifications to the existing onsite electrical infrastructure in order to relocate facilities sited in areas where new buildings are proposed, and to increase the capacity of the overloaded transformers.

The onsite electrical distribution system would be sized in anticipation of full build-out of master planned improvements. The actual increase in demand for electrical power would be phased over the projected 25-year build-out of planned improvements.

1.7.8.6 Communication Service

Increased demand for communications infrastructure to serve the campus expansion proposal would likely require construction of new service connections along the existing communications service connection route. Onsite services would need to be extended to areas currently unserved by the communications network. New communications facilities would likely be constructed beneath the proposed campus loop road.

Preliminary discussions with Verizon representatives indicate that service to the Bastyr University campus is already at capacity, and that redevelopment of any magnitude would require installation of a new offsite fiber optic service cable. New connections to the offsite Verizon infrastructure would be required during Phase 1 improvements.

1.8 Mitigation Measures

Bastyr University will be required to comply with all applicable City of Kenmore code requirements, development standards, and impact fees in effect at the time project-specific development applications are submitted to the City and deemed to be complete, unless alternate provisions for compliance with City regulations are specified in the Planned Action Ordinance and/or Development Agreement to be entered into between the City and University.

1.8.1 Earth

1.8.1.1 Incorporated Plan Features

Conceptual site plans provided for the Master Plan proposal or site plan alternatives show improvements located on the plateau of the site, not on steep slopes or in areas subject to liquefaction.

The proposal includes preparing and implementing a Temporary Erosion and Sediment control (TESC) Plan during construction to minimize sediment disturbance during construction on the plateau, and a stormwater management plan for the developed condition of the site that will discharge surface water runoff in areas not susceptible to erosion.

1.8.1.2 Applicable Regulations and Commitments

Kenmore Municipal Code (Title 18.55.630) requires preparation of a Critical Area Report for proposed alteration of properties within 200 feet of a geologically hazardous area (e.g., steep slopes).

If site development activities are proposed in erosion hazard areas, special clearing permits, a Temporary Erosion and Sediment Control Plan, and other site-specific information will be required.

1.8.1.3 Other Recommended Mitigation Measures

Roads, parking lots, and other improvements shown on conceptual site plans for the Master Plan proposal or alternatives closer than 65 feet to the top of steep slopes should be moved further away during design, or as indicated by the Critical Area Report required to address geologically hazardous areas on the site.

Onsite roads and parking areas should be designed and constructed to prevent stormwater runoff from discharging onto steep slopes in a concentrated manner.

1.8.2 Water

1.8.2.1 Incorporated Plan Features

The majority of new parking spaces on the site under the Master Plan proposal or any site plan alternative would be provided within parking structures. This would minimize the introduction of pollutant-generating impervious surfaces on the site, thereby minimizing stormwater runoff quantity and quality impacts.

Conceptual site plans for the Master Plan proposal and site plan alternatives were developed with the intent to minimize intrusions into forested areas above or adjacent to streams by clustering structural development around the existing academic core and cleared meadow area of the site. Retaining forest vegetation to the maximum extent practicable would minimize surface water runoff.

The proposal to bring the existing site into compliance with stormwater management regulations would result in detained and treated runoff reaching wetlands from areas of the site not presently controlled. This would have water quality benefits for receiving streams and wetlands.

The Flow Control Adjustment request, to allow use of 1995 site conditions as the baseline for stormwater management (versus forested conditions), would result in about 50 percent less detention requirements and protection of existing drainage courses and wetlands adjusted to the existing (1995) developed condition of the site.

1.8.2.2 Applicable Regulations and Commitments

The City of Kenmore requirement for preparation of a Temporary Erosion and Sediment Control Plan (TESCP) and Spill Prevention, Control, and Countermeasure (SPCC) Plan, and the Washington Department of Ecology requirement for preparation of a Stormwater Pollution Prevention Plan (SWPPP) through its National Pollutant Discharge Elimination System (NPDES) Construction General Permit, would require contractors retained by the University to design, obtain approval for, implement, and properly maintain surface water runoff measures during construction.

Kenmore Municipal Code regulations that apply to landslide hazard areas will be used to require adequate means of avoiding adverse impacts to the very steep and unstable slope that surrounds springs in the south portion of the site.

Under the proposed City of Kenmore Sensitive Areas Code (2004a), the Planning Director has the authority to increase stream buffers if the stream buffer includes a slope greater than 30 percent or is susceptible to erosion, and standard erosion control measures will not prevent adverse impacts.

1.8.2.3 Other Recommended Mitigation Measures

To avoid risks associated with sedimentation, road widening that involves crossing stream channels (i.e., NE 145th Street improvements) should be completed during the dry season.

A thorough hydrogeologic study should be performed by a licensed hydrogeologist to determine the sources of recharge to the spring in the south portion of the site, and the amount of water infiltrated on the Bastyr University site under existing and built-out conditions. Measures could be implemented during development on the plateau to offset recharge loss, if this is considered an important impact to offset, based on the use of the springs. A percentage of the captured water could be infiltrated in a location that would contribute to spring recharge, without causing slope instability.

If the stormwater Flow Control Adjustment was not granted, and if stormwater infiltration was required, it would be particularly important to prepare a thorough hydrologic/hydrogeologic study of the site to determine 1) whether infiltration is feasible, and 2) the prospective consequences of significant quantities of infiltration on this site.

1.8.3 Plants and Animals

1.8.3.1 Incorporated Plan Features

The proposal to provide stormwater management measures and to implement Best Management Practices in accordance with applicable regulations during construction and in the completed condition of campus expansion would minimize water quality and water quantity impacts to wetlands and aquatic systems, and to birds, fish and animals that use these systems.

The proposal to provide the majority of onsite parking within structures would minimize the amount of new pollutant-generating impervious surfaces to be introduced on the site, thereby minimizing runoff water quality and quantity impacts to receiving wetlands and streams (i.e., aquatic habitats).

The Master Plan proposal or site plan alternatives would preserve the forest that surrounds the campus to the extent practicable. The proposal under any site plan alternative includes planting trees around proposed gardens, academic buildings, and housing clusters near the original building to extend the mixed Douglas fir-deciduous forest into the campus. This would have secondary benefits in the form of replacing habitat for birds and bat species lost as a result of forest clearing; and maintaining vegetative cover on the site important to filtering runoff (i.e., intercepting sediments and nutrients); providing shade, large woody debris input, and leaf litter inputs to wetlands and streams.

The proposal to implement campus expansion in phases over a period of 25 years would minimize the amount of clearing, grading, and cut and fill activities on the site at any one time, and therefore minimize potential stormwater runoff impacts to wetlands, streams and fish habitat during construction.

The proposal to continue using non-toxic herbicides (e.g., lemon juice and vinegar) and fertilizers (e.g., ground fish fertilizer) for landscape maintenance on the campus would avoid the introduction of chemicals for these purposes on the site and in stormwater runoff, thereby protecting aquatic systems that receive site runoff.

The proposal includes confining noise associated with construction to weekdays between 7:00 AM and 7:00 PM, and Saturdays between the hours of 9:00 AM and 5:00 PM, in accordance with the City of Kenmore noise control ordinance (KMC Chapter 8.05). This practice would minimize potential impacts to nocturnal foraging species such as bat species of concern.

1.8.3.2 Applicable Regulations and Commitments

Avoidance and minimization of impacts to wetlands and their buffers is required under existing City, State, and Federal regulations. During the design phase, avoidance of some direct impacts to wetlands may be possible through strategically locating the widened portion of NE 145th Street away from areas of greatest impact. Direct impacts to wetlands and their buffers will need to be mitigated through restoration or creation of wetlands as required by the City. The size and location of these mitigation areas will need to be determined during the design phase. Wetland buffer impacts could potentially be mitigated by buffer averaging and/or buffer enhancement.

There is not a readily-available wetland mitigation site on the property that would be owned or controlled by the University. Some opportunities may exist on the Saint Edward Park property, or further offsite. If wetlands are disturbed in more than one basin, mitigation would be required in the basins in which the impacts occur. For this reason, it may be necessary to create an agreement with Washington State Parks or some other adjacent or nearby property owner to create a wetland mitigation site at an offsite location.

Stream buffer requirements of the Kenmore Municipal Code would require setbacks for the protection of water quality and riparian vegetation. Where stream buffers overlap steep slope buffers around the perimeter of the campus plateau, setback requirements may be additive.

Because the Bastyr University and Saint Edward Park properties are mapped as significant tree habitat, the City of Kenmore would require that unavoidable impacts to forested areas be mitigated by providing a Tree Protection Plan that would include measures to protect remaining trees during construction and may include tree replacement.

If construction is proposed within 0.25 mile of an identified bald eagle (or other protected bird species) nest at any time during the 25-year construction period of Campus Master Plan improvements, it would be necessary to review local, state, and federal regulations in effect at the time, as the Washington State Department of Fish & Wildlife or some other agency with jurisdiction may require preparation of a Management Plan or other avoidance commitments such as construction timing constraints and noise management procedures to minimize potential disturbance to active nest sites.

1.8.3.3 Other Recommended Mitigation Measures

On some areas of the site, it may be possible to avoid wetland buffer impacts by moving the proposed footprint of impervious surfaces (roads, buildings, or parking lots) further from site wetlands. Although the proposal includes phasing site development over approximately 25 years, wetland impacts should be quantified to the extent possible prior to construction of the selected alternative, and a wetland mitigation approach should be developed that addresses all known wetland impacts in one mitigation plan at the outset.

Hydrologic inputs to site wetlands from stormwater quality treatment facilities should be restored to pre-construction conditions to the extent practicable, to ensure that wetlands would not be reduced in size as a result of reduction in hydrology.

If site plan alternatives were selected to minimize forest-clearing requirements, impacts to vegetation and wildlife habitat could be minimized.

To avoid introducing invasive species into areas where lawn clippings and other plant wastes from campus landscape maintenance is disposed, it is recommended that the composting area proposed as part of the University Gardens be of sufficient size and construction to accept general landscaping wastes as well as garden wastes.

Because the site has a possibility of supporting sensitive plant species (e.g., tall bugbane and bog clubmoss), and/or listed birds or wildlife species, the Washington Department of Natural Resources (WDNR) and Washington Department of Fish & Wildlife recommend that site surveys be conducted where development may occur; however, there is no statutory requirement to survey the site for state-listed species and species of concern on the federal list at the time of this writing. Only federally-listed threatened or endangered species (TES) are protected under the law. It is recommended that during each phase of development, the federal list of TES be reviewed for revisions, and that site investigations be conducted as appropriate, to ensure that plant and animal species are protected as required by law.

Where possible, construction and related incursions into nearby, less disturbed habitat should be minimized (e.g., limit use of nearby habitat for activities such as staging areas and parking). In particular, stream and slope setback areas, and wetland buffers should be temporarily fenced to avoid construction incursions.

If nighttime construction is occasionally unavoidable and permitted by the City, care should be exercised to provide shielded illumination, and to reduce light spill into habitat adjacent to construction sites.

During the site development approval process for each phase of Bastyr University Campus expansion, consideration could be given to implementing measures that would minimize noise, light, and human activity disturbances to wildlife. Examples are provided in Draft EIS Subsection 3.3.3.

1.8.4 Environmental Health

1.8.4.1 Incorporated Plan Features

With natural gas service proposed for the heating requirements of campus expansion under the Master Plan proposal or site plan alternatives, primary reliance on heating oil underground storage tanks would be eliminated, though one or more may be retained as back-up generator fuel sources.

1.8.4.2 Applicable Regulations and Commitments

State and federal regulations will require the University to clean up any conditions of soil or groundwater contamination that may be encountered during construction. Any building materials generated as a result of the demolition and/or remodeling of existing buildings on the campus shall be disposed offsite in accordance with applicable City, state, and federal regulations, and Building Permit conditions.

The asbestos good-faith inspection requirements of Washington Administrative Code (WAC) 296-62-077 require the building owner to identify and properly dispose of asbestos-containing building materials that may be encountered during demolition or renovation activities.

For renovation or demolition materials containing lead (e.g., lead-based paint), Occupational Safety and Health Act (OSHA) guidelines (29 CFR 1926.62) require that these materials be handled and disposed in accordance with applicable local, state, and federal regulations.

1.8.4.3 Other Recommended Mitigation Measures

Unused underground storage tanks should be removed or properly decommissioned and filled in-place to eliminate or significantly minimize the potential for soil and groundwater contamination from leakage as these tanks deteriorate over time.

An Environmental Scientist should be retained for construction monitoring during excavation in the vicinity of USTs or areas of historic fill, and to document the removal of USTs (if any).

Prior to issuance of Building Permit(s) for renovations to existing buildings on the campus, it is recommended that a lead-based paint survey be performed, and that the asbestos-containing building materials survey be updated.

1.8.5 Land Use

1.8.5.1 Incorporated Plan Features

The Bastyr University Campus Master Plan and site plan alternatives were developed with a priority to preserve the existing character of the natural environment of the campus, to minimize the number of trees removed, and to retain forest vegetation to the extent practicable.

The landscaping and open space plan includes planting trees around proposed gardens, academic buildings, and housing clusters to extend the mixed Douglas fir/deciduous forest into the campus as various phases of development are completed. These plantings would provide additional vegetative screening over time.

If Alternative 1 or 2 is selected for implementation, the University proposes to select an architectural style and building scale for the Public Clinic that would be compatible with the character of the adjacent community.

Bastyr University Campus expansion under the Master Plan proposal or any site plan alternative would not alter the forest vegetation screening between the Saint Thomas building (proposed for renovation), and the Saint Edward Monastery building listed on the King County Inventory of Historic Landmarks and the State of Washington Heritage Register.

The Saint Thomas building would be renovated and retained with the campus expansion proposal under and site plan alternative. The unique colonnade entrance would be incorporated as an entrance to one of the four academic schools. It is proposed that the chapel would undergo only code-compliance upgrades.

1.8.5.2 Applicable Regulations and Commitments

The City of Kenmore Comprehensive Plan (2001) designates the Saint Thomas Seminary property a Special Study Area and the proposed Campus Master plan and this EIS were prepared in accordance with that provision. It is anticipated that the approved Campus Master Plan will be incorporated into the City's Comprehensive Plan as a subarea plan, and will guide development activities on the campus over the next 25 years.

The Master Plan proposal and site plan alternatives are generally compatible with the Kenmore Comprehensive Plan vision and guiding principles for growth and development within the City of Kenmore. Draft EIS Subsection 3.5.2 analyzes the compatibility of the proposed action with each element of the City's Comprehensive Plan, developed in accordance with the guidelines of the Washington State Growth Management Act (GMA). Considerably more detail will be developed during preparation of the Planned Action Ordinance and/or Development Agreement. Representative unresolved issues at the time of this writing include: zoning district and building development standards; park and school impact fees; and a possible Public Safety Agreement to describe (among other things) the proposal for improved secondary (emergency vehicle) access to the campus.

Building Permits will include provisions requiring compliance with City regulations or more protection provisions in the Planned Action Ordinance or Development Agreement that will address (among other things): construction hours, noise, access and safety requirements, parking during construction periods, temporary erosion control, and measures to keep streets clear of dirt and mud.

Kenmore Municipal Code (KMC) Chapter 8.05 limits the hours of construction to the period between 7:00 AM to 7:00 PM Monday through Friday, and 9:00 AM to 5:00 PM on Saturdays. Temporary variances may be sought from these limits, if periods of nighttime construction become necessary during the course of the work.

Because the Bastyr University site and Saint Thomas building occupied by the University are currently owned by the Catholoic Archdiocese of Seattle, there are no applicable regulations or commitments relative to the potential historic significance of the existing main building at the time of this writing.

1.8.5.3 Other Recommended Mitigation Measures

From an aesthetic standpoint, it may be preferable to locate the Public Clinic in Alternative 1 or 2 close to Juanita Drive NE with parking behind the building, rather than to have a large expanse of striped and landscaped asphalt with parked vehicles between the roadway and the building. Consideration would need to be given to whether this site plan revision would result in a less desirable building height at this location compared to the proposal to step it down the hill to the west.

Low-level directional lighting should be used in completed areas of the development to avoid light and glare impacts to motorists, observers, or pedestrians on-campus.

It would be desirable for the University to select a contractor with demonstrated expertise in exercising a high standard of care during seismic, structural and building code compliance renovations to preserve the integrity of unique features of the Saint Thomas building during construction, like the colonnade entrance and chapel.

1.8.6 Transportation and Parking

1.8.6.1 Incorporated Plan Features

Under the Master Plan proposal (Alternative 1) or any site plan alternative (Alternative 2, 3, or 4), the following roadway improvements are proposed:

- Widen NE 145th Street
- Construct a new campus loop road
- Install a new traffic signal at the NE 145th Street/Juanita Drive NE intersection, including pedestrian signals
- Enhance current transportation demand management efforts to reduce vehicle trips and the projected on-campus parking deficit.

These improvements would increase the capacity of NE 145th Street, improve existing and future level of service at the NE 145th Street/Juanita Drive NE intersection by reducing delays, enhance internal vehicle circulation and parking on the campus, and improve pedestrian safety on NE 145th Street and Juanita Drive NE.

The NE 145th Street widening proposal and campus loop road construction under the Master Plan proposal or any site plan alternative would include providing new shoulders or sidewalks along NE 145th Street, and internal pedestrian pathways throughout the campus. These improvements would enhance non-motorized access to and within the campus.

Onsite housing that would be constructed under the Master Plan proposal or any site plan alternative would allow some students and faculty to live onsite, and walk to and from classes. This would reduce the proportion of students and faculty that would commute (and thus create offsite trips) to and from the campus on a daily basis.

1.8.6.2 Applicable Regulations and Commitments

Bastyr University, whether through the provisions of Kenmore Municipal Code Chapter 18.100 or the provisions of the site-specific Planned Action Ordinance and/or Development Agreement, will be required to pay traffic mitigation fees to fund transportation improvement projects described in the City's *Transportation Plan.*

The City of Kenmore typically requires that a Construction Management Plan (CMP) be prepared for large developments located within city limits. Among other things, the CMP would address roadway and intersection control during construction, pedestrian control and non-motorized access during construction, lane closures (if necessary), and potential impacts to transit. Onsite parking requirements should be projected for the duration of the construction process, and the proposal for construction parking identified.

1.8.6.3 Other Recommended Mitigation Measures

Under the Master Plan proposal or any site plan alternative, speed humps installed on NE 145th Street would reduce the travel speed of drivers traveling east and west. Speed humps are not permitted, however, on roadways designated as Fire Department access roadways, as NE 145th Street is and will continue to be.

Under the Master Plan proposal or any site plan alternative, the minimum entering sight distance to the west at the proposed campus loop road/NE 145th Street intersection should be confirmed. If necessary, a variance should be pursued. During final design, the campus loop road should be located to maximize entering sight distance while minimizing impacts to adjacent wetlands and/or wetland buffers.

If Alternative 1 or 2 is selected for implementation, the following mitigation measures are recommended for the Public Clinic driveway on Juanita Drive NE:

Locate the new Public Clinic driveway approximately 145 feet north of the centerline of NE 143rd Street, and make the following modifications:

- Move an existing King County Metro transit stop sign currently located immediately south of the proposed driveway location. Locate the sign south of the driveway.
- Clear brush on the west side of Juanita Drive NE south of the Public Clinic driveway to increase sight lines.
- Extend the existing center lane on Juanita Drive NE south to connect with the southbound left-turn pocket for NE 143rd Street, and convert the section adjacent to the proposed driveway location to a center turn lane to allow storage spaces for vehicles that would turn left in and out of the new Public Clinic driveway.

It is recommended that the University update its Parking Management Plan as a condition of the Master Plan approval to ensure adequate parking supply over the life of the campus expansion project. The updated Parking Management Plan should include measures to reduce parking demand for commuters, such as:

- Offering a carpool-matching service for Bastyr students, faculty, and staff
- Encouraging commuting by vanpool
- Providing transit incentives, such as subsidized transit passes
- Providing a shuttle service to nearby transit facilities and/or Park-and-Ride lots
- Charging a fee for single-occupant vehicles parking onsite
- Providing free, preferential parking spaces for vanpools and carpools.

Measures to reduce parking demand by students and families living onsite, such as:

- Initiating a shared vehicle program onsite (such as Flexcar), to provide convenient access to a vehicle without ownership
- Providing transit kiosks onsite with transit schedule information.

Methods for managing onsite parking in the developed condition of the site, such as:

- Assigning parking spaces or parking zones
- Enforcing measures to ensure that cars are not inappropriately parked blocking access roads, driveways, and emergency vehicle access
- Establishing a monitoring program to determine if parking demand reduction measures are adequate
- Reevaluating parking supply and demand every few years

- Identifying incentives to increase transit ridership, and coordinating with King County Metro to ensure that adequate available transit capacity in the future.

1.8.7 Public Services

1.8.7.1 Incorporated Plan Features

Proposed roadway and intersection improvements to NE 145th Street, and the campus loop road proposed as an element of the Master Plan proposal or any site plan alternative, are key elements in the basic infrastructure required for compliance with the ~~International~~ Building ~~Code~~ and ~~International~~ Fire Codes in effect at the time Building Permit applications are submitted ~~as adopted by the City of Kenmore~~. The private asphalt- or concrete-paved campus loop road would be designed and constructed to standards that would support emergency vehicle access to proposed structures and uses around the perimeter of the site.

1.8.7.2 Applicable Regulations and Commitments

Prior to seeking development approvals to implement the Campus Master Plan, the University would develop site design documents to a level that would show additional features for compliance with ~~the International~~ applicable Building ~~Code~~ and ~~International~~ Fire Codes in effect at the time. These features would include, but not necessarily be limited to a looped water system within the campus loop road, hydrant spacing adequate to serve proposed structures, spacing between buildings to provide adequate separation and emergency vehicle access, and asphalt- or concrete-paved access adjacent to buildings. At the time Building Permits are sought for individual structures, building floor plans, type of construction, separation walls, and fire suppression measures would be identified for review by the Fire Department and City Fire Marshal.

The University is, at the time of this writing, engaged in discussions with the City, Washington State Parks Commission, Northshore Fire Department, and the City Fire Marshal to identify, evaluate, select, design, and construct access improvements that will enhance emergency vehicle access to support phased development of the Campus Master Plan. If a specific agreement is not reached between the City and the University regarding acceptable measures to provide adequate emergency vehicle access, Campus Master Plan implementation may be delayed, and/or additional environmental review or mitigation may be required.

As an element of addressing emergency vehicle access requirements, careful consideration will continue to be given to balancing public safety requirements with a desire to minimize adverse impacts to neighboring properties and environmentally sensitive areas.

The University maintains and proposes to enhance a campus safety program that includes orientation training for new students and campus visitors, ~~and~~ an escort service to parking areas for students, and established procedures for verifying alarms ~~and directing fire fighters to the location of fires or other emergencies~~.

1.8.7.3 Other Recommended Mitigation Measures

Northshore Fire Department recommends holding pre-construction meetings, and weekly meetings with the construction foreman while construction is underway, to familiarize fire department representatives with activities such as materials being transported to/from the site, areas on the site where construction activity is taking place, and the nature of construction activities underway at any given time.

Contractors will be required to comply with all applicable Washington State Department of Labor & Industries safety standards.

The Fire Department may require measures such as temporary sprinkler systems and/or 2-hour rated fire doors between building occupants and areas of a building under construction or under renovation, to minimize fire hazards to the onsite campus population during construction.

The City of Kenmore Police Chief has expressed an interest to review proposed parking structures during design to assist in identifying ways to integrate the principles of Crime Prevention Through Environmental Design (CPTED).

The City of Kenmore Police Chief would like to consult with the University and its contractors concerning the type of security to be provided on construction sites, and with the University's design team concerning security systems to be included in buildings to be constructed on the campus

1.8.8 Utilities

1.8.8.1 Incorporated Plan Features

The proposal to provide the majority of parking within structures instead of within surface lots under the Master Plan proposal or any site plan alternative would minimize the introduction of pollutant-generating impervious surfaces on the site, and thus, the size of stormwater detention and water quality treatment facilities that would be required.

1.8.8.2 Applicable Regulations and Commitments

All proposed water and sewer system improvements and construction would be coordinated with Northshore Utility District (NUD) design standards and details pursuant to Kenmore Municipal Code or the requirements of the Planned Action Ordinance and/or Development Agreement.

All proposed natural gas and electrical system improvements and construction would be coordinated with Puget Sound Energy.

The University would be required by utility purveyors to relocate existing onsite utility systems that pass through the area proposed for development, and that would be covered by proposed structures (e.g., the NUD 12-inch water line, and onsite natural gas lines). It is likely that the University would relocate these supply systems to the new campus loop road alignment.

To the extent that utility purveyors would be responsible for any onsite distribution systems, appropriate access easements (or modifications to existing easements) would be required for maintenance and repairs.

In order to establish a new connection to NUD sewer service, the University would need to enter into an agreement with Washington State Parks for this service to cross Saint Edward Park land (see Draft EIS Section 3.8.2).

When new utility distribution lines become functional, existing onsite utility lines in areas where new buildings are to be constructed would be properly abandoned or demolished.

Runoff from new impervious surfaces generated by the Master Plan proposal or any site plan alternative would be managed according to the drainage requirements for new construction as set forth in the *1998*

King County Surface Water Design Manual as adopted by the City of Kenmore and supplemented by the City of Kenmore *Surface Water Management Plan*, or more protective measures that may be described in the Planned Action Ordinance and/or Development Agreement.

The City of Kenmore also requires that commercial developments follow the *1998 King County Surface Water Design Manual* Resource Stream Protection Menu. The treatment goal of this menu is to remove 50 percent of total zinc from stormwater flows. Zinc is a metal often found in stormwater, absorbed by small particulates carried in runoff. Water quality treatment measures to remove zinc would be protective of fish and aquatic habitat in receiving streams and wetlands.

All construction would be accomplished using Temporary Erosion and Sediment Control procedures and Best Management Practices (BMPs), including the use of sediment control fences, berms, and water quality treatment facilities designed to minimize sediment release from areas disturbed by construction activities.

1.8.8.3 Other Recommended Mitigation Measures

Inconveniences during installation of new utility distribution lines on the site could be minimized by accomplishing the switchover at a time of low building use (such as weekend days). Potential short-term impacts to water service during water system upgrades could be minimized by establishing new connections to the existing water main via a "wet tap."

If it is determined that the size of water distribution mains on the University campus site must be increased, or additional lines must be installed to handle the additional water supply requirements of the campus expansion alternative selected for implementation, efforts should be made to construct new water lines ~~within~~ at the outer edge of drive aisles.

Proposed development could incorporate low-flow faucets, toilets, and similar fixtures to minimize domestic water supply requirements and sewage generation. Measures such as rainwater harvesting (i.e., collecting and storing rainwater for some beneficial use, like irrigation), and drought-tolerant landscaping could significantly reduce water requirements for irrigation.

The University could be encouraged, at the time site development approvals are sought, to examine their stormwater management proposal for opportunities to include BMPs and low-impact development alternatives such as rainwater harvesting, amended soil trenches, vegetated roofs, and porous modular grid pavements to further reduce required detention volumes.

Measures that could be taken to minimize energy consumption (electricity and natural gas) generally coincide with measures that would increase building envelope insulation and therefore minimize heat loss. The University could be encouraged, during building design, to look for ways to enhance building insulation and minimize heat loss.

1.9 Significant Unavoidable Adverse Impacts

1.9.1 Earth

If site development occurs substantially as shown on the conceptual site plans provided for the Master Plan proposal or site plan alternatives; i.e., on the plateau of the site, not on steep slopes or in areas subject to liquefaction, and adequately setback from steep slopes in accordance with a Critical Area Report prepared by a qualified professional, there should be no significant adverse impacts to or as a result of slope instability.

1.9.2 Water

To the extent that TESC, SWPPP, SPCC Plan requirements, and Best Management Practices (BMPs) are properly and effectively implemented during construction, the potential for water quality degradation downstream or for erosion/sedimentation of downstream stream habitat is expected to be low. Therefore, no significant adverse impacts to streams are expected as a result of construction on the site.

To the extent that stormwater quality detention and treatment facilities are appropriately designed, located, constructed, and maintained in the developed condition of the site in accordance with applicable City of Kenmore regulations, changes in surface water quantity and quality as a result of site development would be controlled to currently accepted standards.

1.9.3 Plants and Animals

Forest vegetation that constitutes wildlife habitat would be lost to varying degrees as a result of implementation of the Master Plan proposal or any site plan alternative (see Draft EIS Table 2.8.3-1).

Direct impacts to fish would not occur as a result of site development under the Master Plan proposal or alternatives, as fish passage is blocked below the headwater areas of streams that receive runoff from the Bastyr University site. Secondary (i.e., water quality) impacts of development could be minimized through various proposed stormwater management measures.

Construction-related impacts could occur in four of five wetlands delineated on and adjacent to the site.

1.9.4 Environmental Health

No significant unavoidable adverse impacts to the campus expansion proposal were identified in the form of potentially contaminated sites on or near the Bastyr University campus.

Contractors would be required by applicable State and Federal regulations to properly handle and dispose lead-based paint, asbestos-containing building materials, and contaminated soils (if any) encountered during renovation of the Saint Thomas building and new construction onsite.

1.9.5 Land Use

Given the substantial screening afforded by the dense buffer of existing forest vegetation between the campus and the adjacent community, no significant aesthetic or light and glare impacts would be anticipated.

If the Public Clinic is constructed on the Juanita Drive NE frontage under Alternative 1 or 2, landscape screening and light fixtures selected for downward illumination could be effectively used to avoid an incompatible use at this location.

1.9.6 Transportation and Parking

The Master Plan proposal or any site plan alternative would add trips to two signalized intersections that are projected to operate at level of service (LOS) F during the PM peak hour in 2020 without Bastyr University campus expansion: Juanita Drive NE (68th Avenue NE)/SR-522; 61st Avenue NE/SR-522. With the Master Plan proposal (Alternative 1), project trips are forecast to add an average of between 8.3 and 9.9 seconds of delay per vehicle to these intersections during the PM peak hour. This corresponds to delay increases ranging from 3.7 percent to 4.5 percent.

With no additional on-campus housing proposed in Phases 4 and 5 (2020–2030), the project trip generation rate (i.e., number of vehicles traveling to and from the Bastyr University campus) and therefore offsite traffic impacts would be proportionately higher during these years.

1.9.7 Public Services

No significant unavoidable adverse impacts to fire, emergency medical aid, or police protection services were identified based on current growth projections for the service area, assuming agreement can be reached between the City, Bastyr University, Washington State Parks Commission, Northshore Fire Department, and the City Fire Marshal concerning provisions for improved secondary (emergency vehicle) ingress to and egress from the site.

1.9.8 Utilities

No significant unavoidable adverse impacts to utility service providers or the capacity of utilities in the site vicinity were identified.

1.10 Significant Areas of Controversy

Two areas of concern were identified during a public Scoping meeting held at the beginning of the EIS process: 1) loss of community use of ball fields on the site, and 2) increased traffic volumes on Juanita Drive NE and at study area intersections, particularly on the northbound approach to SR-522.

Loss of Community Use of Ball Fields on the Bastyr University Site

The community ball field use was addressed in the response to Scoping comments. The University has as a community service, voluntarily made the ball fields on campus available through a modest lease to youth leagues within the City, at times that have not conflicted with academic uses of the site. Due to environmentally sensitive area constraints of the site (steep slopes, wetlands, streams) to accommodate

the University's expansion plans, and the desire to retain a large central campus meadow on the site, it will be necessary for the University to discontinue this use. Consistent with the City of Kenmore Parks and Recreation Master Plan (adopted in 2001), the City will work with Kenmore Little League to identify and construct improvements to existing ball fields, and to construct new fields at locations both inside and outside of the City.

Increased Traffic Volumes on Juanita Drive NE and at Study Area Intersections

The Master Plan proposal or any site plan alternative would add trips to two signalized intersections that are projected to operate at level of service (LOS) F during the PM peak hour in 2020 without Bastyr University campus expansion: Juanita Drive NE (68th Avenue NE)/SR-522; and 61st Avenue NE/SR-522. With the Master Plan proposal (Alternative 1), project trips are forecast to add an average of between 8.3 and 9.9 seconds of delay per vehicle to these intersections during the PM peak hour. This corresponds to delay increases ranging from 3.7 percent to 4.5 percent.

Five phases of development are proposed over a 25-year period (2006–2030) to implement the Master Plan proposal or any site plan alternative, with most on-campus housing proposed in the first three phases (2006–2020). Onsite housing would reduce the number of students, faculty, and staff that would commute to Bastyr University. The greatest trip increases would occur with Phases 4 and 5, when no additional onsite housing is proposed.

Compared to Alternative 1, Alternative 2 (Reduced Low-Density Housing) could add up to four additional PM peak hour trips traveling through the three intersections identified above, and Alternative 3 (No Public Clinic) could reduce the number of trips by up to 18.

Because there is no specific private residential care facility proposal (Alternative 4) at the time of this writing, the actual number of patients, staff, and visitors cannot be specifically quantified or projected for this alternative. Similarly, the year in which a facility of this type might locate to the site is unknown, as are the hours of operation, the hours during which shift changes would occur, and other factors that affect trip generation and traffic volume impacts on the area roadway system. For this reason, no attempt is made in the Draft EIS to quantity offsite transportation system impacts or mitigation requirements for Alternative 4. If a residential care facility is proposed for the Bastyr University campus at some future time, it would likely require supplemental environmental review.

With the exception of Alternative 4, a comprehensive transportation impact analysis of the Master Plan proposal and site plan alternatives is provided in Section 3.6 of the Draft EIS.

2.0 COMMENTS RECEIVED AND RESPONSES

The *Bastyr University Campus Master Plan Expansion Draft EIS* was circulated for a 30-day public and agency comment period, from October 5, 2004 to November 4, 2004. Written comments were received in the form of letters from three public agencies (the Bothell Fire Marshal, King County Fire Protection District No. 16, and the Washington State Parks and Recreation Commission,), and e-mail communications from two interested individuals. These are reproduced in this Final EIS. Responses to comments follow each written comment. Comments and responses are organized by agencies first (Section 2.1), followed by interested individuals (Section 2.2), in alphabetical order.

A public meeting was held during the 30-day Draft EIS comment period, on October 27, 2004. The advertised purpose of this meeting was to present information on the proposed Campus Master Plan, to answer questions, and to provide an opportunity to receive comment on the Draft EIS and Master Plan proposal. The meeting was never formally convened due to the absence of an audience. Therefore, there is no transcript of oral testimony received regarding the Draft EIS or proposed action.

Responses to comments constitute the response of the City of Kenmore, with input from Bastyr University, where appropriate. All comments received, and the response to comments will be considered by City of Kenmore decision makers when making determinations regarding Master Plan approval, adoption of the Planned Action Ordinance and Development Agreement, Comprehensive Plan and Zoning Code amendments.

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9654 NE 182nd Street **phone 425-489-4873**
Bothell, WA 98011 **fax 425/481-4335**

November 03, 2004

Mr. Bob Sokol, Community Development Director
City of Kenmore
Department of Community Development
6700 NE 181st Street
Kenmore, WA 98028-0607

RE: Comments to the Bastyr University Campus Master Plan EIS

After reviewing the Draft Environmental Impact Statement (DEIS) for Northshore Fire Department I have a number of issues and concerns that I have listed below. They are:

The following is a list of issues I have identified in the Draft EIS that was forwarded to me for review:

1. Page 1-2. At the top of the page they refer to a voluntary agreement to coordinate planning activities. I would like to know if in fact it is a voluntary agreement?

2. Pages 1-3, 1-4, 1-5, 2-52. In the second paragraph of page 1-3 it mentions Laboratories. In the fifth paragraph on page 2-52 it mentions the residential care facility and what type of services will be available. There will be concerns regarding Hazardous Materials and other special hazards with the existing facilities, and any new facilities. These types of materials are strictly regulated under the uniform codes. It needs to be indicated in the Final EIS that hazardous materials or hazardous processes will be reviewed for compliance with the codes prior to issuance of permits. It should also be mentions in the FEIS that the residential care facility must be reviewed and approved by the Washington State Fire Marshal's Office as well as the local jurisdictions.

3. General Comment. Throughout the document there is mention to opticom pre-emption devices at controlled intersections. These devices must be the latest 3M opticom product. No other brand, at this time, is compatible with necessary recording devices that come with this product.

4. General Comment. Throughout the DEIS it talks about the new looped roadway around the campus. It needs to be mentioned in the FEIS that these roads must remain open at all times for fire department access. In addition there are insufficient access roadways to the existing as well as the newly proposed buildings. This can be accomplished by providing access roadways around the new building clusters or by engineering greater thicknesses for the walkways that are shown around all of the building clusters. The fire department access roadways will need to be paved with either asphalt or concrete or some other approved surface. In any case, the fire department access roads will need to be reviewed for compliance with adopted codes and ordinances and will not be approved unless these standards are met. As a minimum, the looped road will need to be no less than 20 feet in width. The following are quoted sections of the uniform codes:

Under Chapter Five, Section 503.1.2, "The Fire Code Official is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, conditions of terrain, climatic conditions or other factors that could limit access."

In addition, "Approved fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility."

Under 504.1 it also states, "Exterior doors and openings required by this Code or the International Building Code shall be maintained readily accessible for emergency access by the Fire Department. An approved access walkway leading from fire apparatus access roads to the exterior openings shall be provided when required by the Fire Code Official."

Also under 503.2.2 it states, "The Fire Code Official shall have the authority to require an increase in the minimum access widths where they are inadequate for fire or rescue operations.

Speed humps or bumps are not permitted in roadways that have been designated as fire department access roadways. In addition, gates are not permitted unless approved by the Fire Department. As you can see, the requirements for access roadways and impacts to them are a requirement, not an agreement. They must be approved by the Fire Department.

5. General Comment. Throughout the DEIS there is mention of sufficient existing fire flow to this site. I don't know how this claim can be made without knowing what the required fire flow will be for the total build out. The fire flow, even for the existing buildings, has not been calculated as of yet. A twelve inch looped water main system

will need to be provided around the perimeter looped road off of the existing NUD loop. In addition, there will need to be sub-loops off of the new twelve inch perimeter loop to serve each of the building clusters. Lastly, another connection point for the new perimeter loop needs to be provided off of the main entrance at NE 145th St. and Juanita Drive.

I think it needs to state clearly in the FEIS that all water mains and fire hydrants shall be designed as required by the Northshore Fire Department and approved by the same prior to submittal to the water purveyor. It shall also state that the required fire flow will be calculated by the Northshore Fire Department as well. As far as the adequacy of the existing available fire flow, that shall be determined at the time of building permit submittal.

6. General comment. It refers throughout the DEIS to an all weather surface. To the Fire Department an all weather surface shall mean a roadway that is paved with either asphalt or concrete and meets the requirements for a fire department access roadway. On rare occasions, other surfaces could be approved by the Fire Department. The FEIS should indicate this.

7. Page 1-28. The last paragraph of 1.7.7.2 makes mentions verification of alarms and directing firefighters to the location of fire or other emergencies. Once the fire alarm systems are upgraded, including a graphic annunciator, the Fire Department will no longer need to be directed to a fire location. This is a safety issue. It is the Fire Department's intent to have all students, and staff, leave the building at the first sign of fire. They are not equipped nor trained for this, and they should not be expected to. If someone with special knowledge of an incident wants to meet the arriving emergency crews and pass on their knowledge that would be wonderful.

8. Page 1-28. In section 1.7.7.3 it refers to recommendations during remodels. It needs to be very clear in the FEIS that anything the Fire Department requires is in fact a requirement (code) not a recommendation.

9. Page 1-29. Under section 1.7.8.2 in the first paragraph it refers to approvals for water and sewer. See number five above.

It also refers to relocation of some water mains during different phases. I think it needs to state that most of this work needs to be accomplished now rather than later. If this is done later the school will have to shut down for the day and send all students and staff home for the day so the risk of fire is reduced to an acceptable level. At that time they shall install additional main line control valves throughout the entire system to prevent shut downs in the future. Also under section 1.7.8.3 they talk about minimizing the risk during changes to the water mains by doing this work on weekends. This is a possibility. However, neither NUD, the City nor the Fire Marshal's office works on weekends to inspect this work. It should state in the FEIS that the school or contractor shall pay for all costs, including overtime costs, associated with weekend work and the inspections that go with it.

10. Page 1-29. Under section 1.7.8.2 in the second paragraph it refers to proposed gas and electrical improvements. All electrical improvements need to be reviewed and approved by the State Department of Labor and Industries, Electrical Division.

11. Page 1-30. It refers to placing water mains within drive isles. While this is a good idea, it should state in the FEIS that all water mains that are placed within drive isles shall be placed at the outer edges of these isles to minimize the risk of having to block a fire department access roadway while one of these main is being worked on.

12. General comment. In different sections of the DEIS there is reference to previous agreements made with entities. If agreements have been made in the past, and the school wants the Fire Department to honor them, these agreements must be submitted to the Fire Department for review and possibly approval.

13. General comment. There is reference throughout the DEIS of a secondary emergency access. Under section 2.6.1.5 it refers to three possible alternatives for this emergency access roadway. In fact there is only two that have been discussed with the Fire Department. Alternative number two was only a stop gap measure. The Fire Department indicated to the school that the main entrance widening could possibly be used to allow them to start with remodeling of the existing buildings. To date, this discussion has not been finalized. The Fire Department has been waiting for the school to get back to them with a proposal that they could look at. The secondary emergency access will need to be in place, without prior approval, before any new work is done on either existing buildings or new buildings. This needs to be shown in the FEIS.

14. General comment. In Figure 2.6.1-1, full build out, it does not show the possible residential care facility. Since it is identified in the DEIS it needs to be shown in the full build out figure.

15. Page 2-21. Section 2.6.1.4 refers to the main entrance and the internal circulation plan. The entrance shall not be divided with a landscape planter unless it is spaced sufficiently back from the entrance so the inside turning radii of fire apparatus is not impacted.

16. Page 2-37. Under section 2.6.3.1 it refers to upgrading, during the first phase, the existing buildings to meet current Buildings, Fire and Seismic Codes. It also refers to the addition of another story. Before any work is done the existing fire sprinkler system will need to be evaluated by a fire sprinkler contractor who should make recommendations as to the adequacy of the existing systems. This will need to be done for the electrical, standpipes, fire alarm, and structural systems. After this has been accomplished, the different departments can make the proper determinations as to what and when upgrades will need to be made. In addition, a copy of building plans showing what areas existing fire sprinkler and detection systems cover. These plans need to be submitted to the Northshore Fire Department for review.

17. General comment. Until the proposed improvements to the utilities infrastructure have been evaluated, the timing has been agreed upon, and the secondary emergency access has been installed, none of the additional phases shall be allowed to be constructed. This will prevent problems in the future if the school decides to change their phasing order. This needs to be clear in the FEIS.

18. Page 2-44. Section 2.7 refers to the possible alternatives. Regardless of which plan or alternate plan is chosen, the same infrastructure requirements will be required. We still need to have fire apparatus access, sufficiently sized water mains and the proper number of fire hydrants. In addition, there will still need to be fire suppression systems along with sufficient fire alarm systems for all new and existing buildings.

19. There needs to be a plan in place as to what the school is gong to do with the underground storage tanks. (UST's) There are a number of questions. Has contaminated soil been discovered, and if so, what is going to do be done about it? If they are going to abandon the tanks in place a plan needs to be developed and approved by the Fire Department and inspections during the process need to be conducted until the plan is complete. If they are going to keep the tanks they may need to be tested an possibly permitted by the State Department of Ecology.

20. Page 3-45. It refers to an existing above ground flammable liquid storage tank that contains gasoline. Again, there are questions regarding this tank. Does the tank meet current standards? Is it marked properly? Was the code met when it was installed? I believe the DEIS states that it was installed inside of a building. Does it meet code. Does it need a permit from the Department of Ecology?

21. Page 3-45. Asbestos is mentioned in their DEIS. A map needs to be provided to the fire department that shows the asbestos locations so this information can be incorporated into the department's pre-fire plan to alert fire crews.

22. Page 3-79. In the first paragraph it refers to the International Codes. They need to show in the FEIS that the Fire and Building Codes that are in effect at the time a permit application is submitted is what will it will be reviewed against.

23. General note. In the DEIS it refers to on-site housing. Is there a chance that they will have whole families living on this site? This needs to be identified.

24. Page 3-127. On this page there is reference to an existing six inch water main with three or four fire hydrants being served off of this line. These fire hydrants need to be removed so there is not confusion as to what fire hydrant is served off of which of the two water systems. In addition, there is mention of an eight inch water main that encircles the main building. From what I can determine off of the submitted water maps this water line consists of two dead end mains that are not inter-connected at their ends.

In the forth paragraph there is mention of the lack of access roadways around the existing building. This is in fact true. There will need to be access roadways around all of the buildings. The interior constraints identified will be addressed during the review of their submitted remodel building plans.

25. Page 3-129. In the third paragraph it mentions the Fire Department's recommendation as to fire sprinklers and area separation walls. These will not be recommendations. These will be requirement based on codes.

26. Page 3-129. In the last paragraph it refers to the widening of the main entrance and the removal of trees. These trees will not necessarily have to be removed. The trees that are tall enough to fall over during an environmental event and block fire department access can be topped to a level that would prevent them from blocking the roadway without removing them. Some of the closer trees may need to be removed but not to the extent that the DEIS indicates.

27. Page 3-132. In the third paragraph under water service it states that the water system is strained at best. I have to assume that they are referring to the domestic water system and not the fire protection water system. This needs to be clarified in the FEIS.

Yours for Safety through Fire Prevention

R. D. Wright, Fire Marshal

RESPONSE TO COMMENTS RECEIVED FROM BOTHELL FIRE MARSHAL

The Bastyr University site is within the service area of King County Fire District No. 16, also known as the Northshore Fire Department. Cities within King County have the option to establish their own municipal fire protection agency, or utilize the services of a King County fire protection district. The City of Kenmore has elected to contract with the Northshore Fire Department (hereafter referred to as the Fire Department) to provide fire inspection and fire protection services. In addition, the City of Kenmore, in conjunction with the Fire Department, has contracted with the City of Bothell Fire Department for selected Fire Marshal services, such as examining proposed building plans for compliance with the International Building and Fire Codes adopted by the City of Kenmore. It is in this context that comments were submitted by Bothell Fire and E.M.S. (Emergency Medical Services), Bureau of Fire Prevention.

Response to Bothell Fire Marshal Comment #1 re: Voluntary Agreement to Coordinate Planning Activities

Yes, it is a voluntary agreement for the mutual benefit of the City of Kenmore and Bastyr University to coordinate planning activities related to the University's Campus Master Plan for expansion on the Saint Thomas Center site.

Response to Bothell Fire Marshal Comment #2 re: Hazardous Materials and Private Residential Care Facility

The City and University acknowledge that there will be concerns to be addressed according to uniform codes regarding hazardous materials and possible hazardous process requirements associated with renovation of existing uses on the campus, and development of new uses contemplated in the Campus Master Plan. These will be addressed by the Fire Department and City Fire Marshal at the time site development approvals and Building Permits are sought. The Campus Master Plan proposal is presented in the EIS as a conceptual framework to guide the University's expansion on the campus. Several additional levels of review and approval will be required during the design and permitting phases.

The Private Residential Care Facility (Alternative 4) is one site plan alternative considered for the site. At the time of this writing, the University's preferred alternative remains the Campus Master Plan proposal (Alternative 1, Figure 2.6.1-1 in the Draft EIS; Figure 1.5-1 in this Final EIS). It is noted in Section 1.6 of this Final EIS (and in several locations in the Draft EIS) that if the University were to propose a Private Residential Care Facility on this site, supplemental environmental review would likely be required. It is further acknowledged that this alternative use would be subject to additional review and approval by the Washington State Fire Marshal's Office and local jurisdictions, as appropriate.

Response to Bothell Fire Marshal Comment #3 re: Opticom Pre-Emption Devices

The preferences of the Fire Department and the City Fire Marshal for particular emergency access equipment (such as the latest 3M Opticom product) will be sought at the time of Building Permit approval, as these preferences may vary over the 25-year build-out period of the Master Plan proposal. The Campus Master Plan has not yet reached this level of detail. The one location in the Draft EIS where a pre-emption device was discussed (Section 2.6.1.5, page 2-25) has been clarified through means of the Final EIS Errata sheet (Chapter 3).

Response to Bothell Fire Marshal Comment #4 re: Proposed Campus Loop Road

The City and University acknowledge the requirement for the proposed new campus loop road to remain open at all times for Fire Department access, and confirm their intent for this to be the case. Onsite circulation has not yet been designed to a level of detail that illustrates access roadways around buildings to be renovated or proposed new buildings. The Draft EIS states in Section 3.7.1 (page 3-128) that:

> The private, all-weather surface of the campus loop road would be designed and constructed to standards that would support emergency vehicle access to proposed structures and uses around the perimeter of the site.

The Draft EIS (Section 3.6.4, page 3-110) describes design standards for the campus loop road as follows:

> The campus loop road is proposed as a private roadway: a rural, two-lane roadway with shoulders and grass-lined swales on each side. This type of roadway would, at a maximum impact level, be similar to a "Subaccess Street" described in *King County Road Standards* (King County 1993) as requiring a minimum right-of-way of 48 feet, a minimum roadway width of 28 feet, a minimum pavement width of 20 feet, 4-foot shoulders, and standard stopping sight distance of 150 feet along the roadway. Design standards for this roadway may be specified differently in the Planned Action Ordinance or Development Agreement, provided that the new roadway would meet applicable safety and access requirements associated with projected levels of use.

To assure that the proposed new campus loop road will meet applicable safety and access requirements, the design standards for this roadway will be subject to review by the Fire Department and the City Fire Marshal at the time site plan improvements progress to this level of detail.

The Summary (Final EIS Chapter 1) has been revised, and Draft EIS Section 3.6.4 (page 3-112) has been corrected by means of the Errata sheet in Chapter 3 of this Final EIS to eliminate the recommendation for speed humps on NE 145th Street, to avoid creating an incompatible situation for use of this roadway by Fire Department and other emergency aid vehicles.

Response to Bothell Fire Marshal Comment #5 re: Fire Flow

The Potential Operational Impacts discussion in Draft EIS Section 3.8.1, Water Service, acknowledges that no project-specific engineering calculations have been performed at this stage of Planned Action review. The Draft EIS preliminary assessment of the adequacy of the water supply to the site is based on communications with the responsible purveyor, Northshore Utility District. The District reports that:

> Fire flow was not specifically tested in relation to serving the Bastyr University campus expansion proposal or site plan alternatives; however, due to the size and capacity of the NUD distribution system in the area, the utility district considers that there should be more than enough water to meet the fire flow requirements of the development (personal communication with Pat Sutherland, Technical Support, Northshore Utility District, September 29, 2004).

The City and University acknowledge that it will be necessary to perform actual fire flow tests at the time of phased development approvals and Building Permit applications. It is not warranted to attempt to perform this detailed analysis at this time for total build-out, as there may be site plan or structural revisions to the Campus Master Plan concepts for campus expansion. Through the contact that occurred during preparation of the EIS, NUD is aware of the total build-out concept and the 25-year phased implementation proposal, and can incorporate these prospective demands in their long-range capital facilities planning.

The requirement for all water mains and fire hydrants to be designed in accordance with the requirements of the Northshore Fire Department and approved by this department prior to submittal to NUD has been noted in the Final EIS Summary and Errata sheet in Section 3.

Response to Bothell Fire Marshal Comment #6 re: Roadway All-Weather Surfaces

The Final EIS Summary has been revised, and the Draft EIS has been searched for all references to an "all-weather surface" for roadways to be used by fire and emergency medical aid vehicles. This adjective has been corrected by means of the Errata sheet (Final EIS Chapter 3) to clarify that asphalt- or concrete-paved surfaces will be required by the Fire Department.

Response to Bothell Fire Marshal Comment #7 re: Directing Fire Fighters to the Location of Fires or Emergencies on the Campus

The last paragraph in Draft EIS Section 1.7.7.2 (page 1-28) has been updated in the Final EIS Summary (Section 1.8.7.2). Because this is a summary statement of text presented in Draft EIS Section 3.7.1 (page 3-129), the Final EIS Errata sheet (Final EIS Chapter 3) updates the text at this location, as well.

Response to Bothell Fire Marshal Comment #8 re: Fire Department Requirements

The City and University acknowledge that the Fire Department and the City Fire Marshal will review and condition site development approvals and/or Building Permit applications with requirements for public and structural safety. This clarification has been made in the Final EIS Summary, and by means of the Errata sheet to Draft EIS Section 3.7.1 (page3-129).

Response to Bothell Fire Marshal Comment #9 re: Approvals for Water and Sewer

See the response to Bothell Fire Marshal Comment #5, above.

The timing for on-campus water main relocations will be determined in consultation with the Northshore Utility District, the Fire Department, and the City Fire Marshal when site development approvals are sought for phased implementation of the Campus Master Plan. If utility relocations occur on weekends such that inspections are required on weekends, overtime costs will be imposed according to applicable code provisions for these arrangements.

Response to Bothell Fire Marshal Comment #10 re: Electrical Improvements

The Draft and Final EIS Fact Sheet (page iii) acknowledges the requirement for electrical permits from the Washington Department of Labor & Industries.

Response to Bothell Fire Marshal Comment #11 re: Water Main Locations in Drive Aisles

The location of water mains (and other utilities) to be constructed beneath the proposed new campus loop road (and other driving surfaces) will be subject to Northshore Utility District and City of Kenmore design requirements. It will be in the best interest of all parties (NUD for maintenance access, the University for campus access, and the Fire Department for emergency access) for utilities to be installed at the outer edges of drive aisles to maintain through-traffic on roadways in the event that trenches need to be opened for maintenance or repair work on underground utilities.

Response to Bothell Fire Marshal Comment #12 re: Agreements with Other Entities

The City and the University are currently engaged in drafting a Planned Action Ordinance and a Development Agreement to implement the Bastyr University Campus Master Plan. The Development Agreement will include voluntary measures to mitigate campus growth and improvements between 1995 and 2003, and a Public Safety Agreement to address planned growth on the campus. The Planned Action Ordinance and Development Agreement will require City Council approval. The City and University have initiated steps to engage the Fire Department and the City Fire Marshal in developing the terms and conditions of the draft Public Safety Agreement, and will continue to work with these entities to finalize this document. The Fire Department will be a party to the Public Safety Agreement. In addition, the City and the University will be inviting Saint Edward Park (the Washington State Parks and Recreation Commission) to join the Fire Department and others on a steering committee to participate in the evaluation and design of a secondary access route to the Bastyr University campus and potential to also serve the State Park.

Response to Bothell Fire Marshal Comment #13 re: Secondary Emergency Access

A copy of the KPFF Consulting Engineers Memorandum, *Bastyr Secondary Access Alternatives* (December 31, 2003) that is the basis for Draft EIS Section 2.6.1.5 was provided to Fire Department officials (Tom Weathers, Deputy Fire Chief, Northshore Fire District; and Randy Parkhurst, Lieutenant, Bothell Fire and E.M.S.) during a meeting at Kenmore City Hall on February 4, 2004. The three alternative routes for secondary (emergency vehicle) access were discussed between Fire Department, City, University, and EIS consultant team representatives at that time.

It is acknowledged that discussions to confirm long-term provisions for improved secondary (emergency vehicle) access to the Bastyr University and Saint Edward Park are still on-going. It is one objective of the Public Safety Agreement (referred to in the response to Bothell Fire Marshal Comment #12, above) to reach agreement concerning how all parties involved (including the Washington State Parks and Recreation Commission) will proceed on this issue. The executed Public Safety Agreement will be in-place prior to any development to implement the Campus Master Plan.

Response to Bothell Fire Marshal Comment #14 re: Figure 2.6.1-1

Figure 2.6.1-1 in the Draft EIS (Figure 1.5-1 in the Final EIS) is the Campus Master Plan Proposal; i.e., the University's preferred alternative. It does not show the Private Residential Care Facility, because this use is one site plan alternative that was evaluated in the EIS (Alternative 4, Draft EIS Figure 2.7-3, pages 2-50 through 2-54). Also see the response to Bothell Fire Marshal Comment #2, above.

Response to Bothell Fire Marshal Comment #15 re: Main Entrance Design

Neither the text of Draft EIS Section 2.6.1.4, nor illustrations of the proposed main entrance on conceptual site plans presented in the Draft EIS, indicate that the campus main entrance would be divided with a landscape planter. The Campus Master Plan has not progressed to this level of design detail. The campus entrance design will be subject to review by the Fire Department and the City Fire Marshal review at the site development approval and Building Permit stage.

Response to Bothell Fire Marshal Comment #16 re: Code Compliance for Building Renovations

The University has not yet prepared and the City has not yet received building plans or specific details for renovations to the existing building. It is acknowledged that the Fire Department and the City Fire

Marshal will be involved in the review of the Building Permit application for this work, and will impose appropriate requirements at that time.

Response to Bothell Fire Marshal Comment #17 Timing for Proposed Improvements

See the response to Bothell Fire Marshal Comment #13, above. The phasing and timing of all campus improvements will be reviewed as part of the Planned Action Ordinance and Development Agreement, to which the Public Safety Agreement will be attached.

Response to Bothell Fire Marshal Comment #18 re: Possible Alternatives

This comment is acknowledged.

Response to Bothell Fire Marshal Comment #19 re: Underground Storage Tanks

Draft EIS Section 3.4, Environmental Health (pages 3-43 through 3-47), reports the results of an *Environmental Baseline Study* (Shannon & Wilson, Inc., September 23, 2004) of the Saint Thomas Center site occupied by Bastyr University. This report is reproduced in Appendix D of the Draft EIS. The baseline study describes and illustrates the location of above-ground and underground fuel storage tanks on the property, and other potentially contaminated areas. At this level of investigation, it has not yet been confirmed whether there are areas of contaminated soils on the site. The City, University, and the Draft EIS at page 3-47 acknowledge that all applicable regulations and requirements will be followed with respect to continued use, abandonment in-place, or removal of fuel storage tanks and other potential sources of contamination during redevelopment of the site to implement Campus Master Plan improvements.

Response to Bothell Fire Marshal Comment #20 re: Above-Ground Gasoline Storage Tank

See the response to Bothell Fire Marshal Comment #19, above.

Response to Bothell Fire Marshal Comment #21 re: Asbestos

Draft EIS Section 3.4 and Appendix D report that inspection of the existing building proposed for renovation has not yet been thoroughly investigated for the presence of asbestos-containing building materials. The Applicable Regulations and Commitments discussion (Draft EIS, page 3-47) notes that:

> The asbestos good-faith inspection requirements of Washington Administrative Code (WAC) 296-62-077 require the building owner to identify and properly dispose of asbestos-containing building materials that may be encountered during demolition or renovation activities. All personnel, contractors, and any other person(s) who may disturb asbestos-containing building materials should be notified and trained in accordance with Code of Federal Register: 29 CFR 1926.1101 prior to disturbing these materials.

This level of detailed inspection will be required prior to the initiation of any work to renovate the existing building.

Response to Bothell Fire Marshal Comment #22 re: Applicable Codes

The requested clarification has been added to the Final EIS Summary, and the Errata sheet in Final EIS Section 3 notes this clarification in Draft EIS Sections 3.5.2.2 and 3.7.1. All site development and

Building Permit approvals will be subject to all applicable codes in effect at the time these approvals are sought (as opposed to citing compliance with only the International codes).

Response to Bothell Fire Marshal Comment #23 re: Family Housing Onsite

The Campus Master Plan housing proposal is described in Draft EIS Section 2.6.1.7 (page 2-30). Three types of housing units are proposed: Low-Density Housing (90 units/two beds per unit), Medium-Density Housing (approximately 36 units of family housing, 4 to 6 beds per unit), and High-Density Housing (approximately 200 units/two beds per unit). Wherever Medium-Density Housing is discussed throughout the EIS, it is noted that this is intended to be family housing. The Master Plan proposal and any site plan alternative would locate this housing in the vicinity of the elevated water tower in the southwest corner of the site (see Final EIS Figure 1.5-1).

Response to Bothell Fire Marshal Comment #24 re: Existing Water Service and Hydrants

The discussion referenced in this comment occurs in Draft EIS Section 3.7.1, Public Services: Fire Protection and Emergency Medical Aid, Affected Environment. This section correctly describes existing conditions on the site. It is acknowledged that the existing system of water mains and hydrants will not be adequate to serve the campus expansion proposal. The relationship of the Campus Master Plan proposal to the existing water system, and improvements needed to implement the preferred conceptual site plan, are discussed and illustrated in Draft EIS Section 3.8.1, Utilities: Water Service (pages 3-132 through 3-136). As previously stated in the response to these comments, site development approvals, Building Permits, and utility plans will be subject to review and approval by the Fire Department and the City Fire Marshal at such time as this level of detail is available.

Regarding lack of access roadways around the existing building, see Bothell Fire Marshal Comment #4, and the response to that comment above.

Response to Bothell Fire Marshal Comment #25 re: Fire Department Requirements

See Bothell Fire Marshal Comment #8, and the response to that comment above.

Response to Bothell Fire Marshal Comment #26 re: Tree-Topping vs. Removal

The suggestion that trees tall enough to fall across the access road (i.e., NE 145th Street) could be topped to a level that would prevent them from blocking the roadway in the event of an environmental event (such as a windstorm) that would cause them to fall will be taken into consideration in discussions with the adjacent property owner (Washington State Parks and Recreation Commission) during finalization of the Secondary Access Plan and Public Safety Agreements.

Response to Bothell Fire Marhsal Comment #27 re: Capacity of Existing Water System

The Draft EIS at page 3-132 (Utilities: Water Service, Affected Environment) states that:

> Discussions with Bastyr University maintenance staff indicate that the existing water service connection to the existing main building is only sufficient for providing general needs at this time, and may be at capacity (personal communication with Tim Mason, Director of Facilities and Safety, and Matt Fickel, Facility Coordinator, Bastyr University, August 29, 2002.) This is suspected to be a result of the steep topography of the site and the relatively advanced age of the system; i.e., it is likely that corrosion has reduced the diameter of pipe sizes.

Tim Mason, Bastyr University Director of Facilities and Safety, was re-contacted on November 11, 2004, for a response to the Fire Marshal's concern that the onsite water system is "strained at best." Mr. Mason reports that this is not the case, and perhaps there was some misunderstanding in the prior communication cited in the Draft EIS. The 12-inch NUD line that serves the site has more than adequate capacity to serve existing structures on the campus, both in the form of domestic supply and fire flow. The building is served by a 2½ or 3-inch line at the meter. At least six fire hydrants are served by the NUD water supply (i.e., 12-inch line). The water source to three additional hydrants is unclear from utility drawings of the campus; these may still be served by the elevated water tower. Fire flow has not been tested on the campus in recent years; however, based on the supply lines, the University's Director of Facilities and Safety (Tim Mason) is not aware of reason for concern. Also see the response to Fire Marshal Comment #5, above.

KING COUNTY FIRE PROTECTION DISTRICT NO. 16
18030-73RD N.E.
KENMORE, WA 98028

BUSINESS (425) 486-2784 FAX (425) 483-6598 EMERGENCY 9-1-1

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CITY OF KENMORE

November 03, 2004

Bob Sokol, Community Development Director
City of Kenmore
Department of Community Development
6700 NE 181st Street
Kenmore, WA 98028-0607

RE: Comments to the Bastyr University Campus Master Plan EIS

(1) Please accept the following comments as corrections and/or clarifications of information presented in the October 2004 Draft of the Bastyr University Campus Master Plan Environmental Impact Statement. These items represent concerns specific to the Northshore Fire Department. Additional concerns will be presented in another letter from Denny Wright, City of Bothell Fire Marshal and our contract content expert for fire marshal services. I appreciate the opportunity to present these modifications.

(2) General comments:

- At the first mention of our fire department, state King County Fire District #16 hereafter titled Northshore Fire Department. King County Fire District #16 is the legal name of our District and Northshore Fire Department is the common name.
- The term staffing or personnel is recommended versus the term "manpower".

(3) Specific section comments: (please note that if the item referenced appears again under another section, the comments will be for all such references.)

- 1.6.5.4 (p 1-13) 1st paragraph, second bullet. The Public Services Element may not in actuality be able to guarantee no adverse impact to existing fire services. Based upon the current growth projections for the fire district, adverse impacts are not expected.

4

- 1.6.7.1 (p 1-15/16) The first paragraph denotes the expected increase of emergency calls during the construction phases. This increase is not only expected due to the situations mentioned, but also with the increased traffic in and around the area. In the second paragraph, this assumption is based upon the current projected rate of growth of the fire district and the impact may change given an alteration to the projected growth.

5

- 1.8.7 (p 1-31) The paragraph states "no significant unavoidable impacts to fire, emergency medical aid or police protection services were identified ….". This is correct only with the assumption that all current and future life and building safety recommendations are complied within the recommended time frame.

6

- Public Services Element, Public Services – Policy Summary (p3-73 and 3-77) The second bullet under this section states a service level of 1 firefighter per 900 persons (residents) and that we meet all guidelines in regards to staffing levels for emergency mitigation without reliance upon automatic aid. We have no service level that ties the number of firefighters to population. We evaluate the service level requirements and staff accordingly. As for the reliance upon automatic aid to effectively mitigate an emergency, it is the area norm to rely upon such aid as no individual department with the exception of Seattle and Bellevue has adequate resources to accomplish this task.

7

- Adequate Public Facilities and Services (p 3-79) The first paragraph states that the fire department "confirmed the growth projections are within the range anticipated for their service levels and would not adversely impact existing levels of service, manpower or equipment projections". It would be correct to state that adverse impacts are expected based upon current district growth projections.

8

- Table 3.6.6-1 (p 3-121) The data submitted is incomplete. Fire response data indicates higher frequencies than reported. In addition, the call volume for fire department emergency response is not included in the body of the document. This data is still being assimilated.

9

- 3.7.1 Affected Environment (p 3-126) In the first paragraph, it describes back-up agreements with other fire agencies. The correct reference should be that we have automatic aid agreements with all fire agencies within Zone 1 of King County. These agencies include the fire departments of Shoreline, Bothell, Kirkland, Redmond, Woodinville, Bellevue, Duvall, Mercer Island and Eastside Fire and Rescue. In addition, mutual aid responses are provided by Seattle and many Snohomish County fire departments. The description of fire stations should reflect that our department's station #57, located in Lake Forest Park is 3.5 miles northwest and a Shoreline station is approximately 6 miles to the northwest. All stations are *staffed* 24 hours per day.

10

- 3.7.1 Affected Environment (p 3-126) The second paragraph should read: The first response to a reported fire would include: three engines, one ladder truck, one Battalion Chief, one rescue truck, one medic unit and one medic supervisor. The first arriving unit would normally arrive within less than 5 minutes. All stations within the service area regularly review their response times to ensure compliance with national standards. Traffic and weather …..SR-522 is the primary response access route for all first response units with the exception of the engine from Kirkland, which would respond from Juanita Drive NE. …….

(11)

- 3.7.1 continued (p3-127) The third paragraph on this page should read: The Washington State Surveying and Rating Bureau of the Northshore Fire Department is a Class 4. Ratings range from 1 to 10, where 1 is the highest, and are based upon factors such as water supply, suppression equipment, communications and fire safety control features. The Fire department has requested a rating review with the goal of obtaining a 3 classification rating.

Tom Weathers, Deputy Fire Chief

RESPONSE TO COMMENTS RECEIVED FROM
KING COUNTY FIRE PROTECTION DISTRICT (FPD) NO. 16,
NORTHSHORE FIRE DEPARTMENT

Response to King County FPD No. 16 Comment #1 re: Context in Which Comments are Submitted

This comment is acknowledged. Also see the letter of comment reproduced herein from Bothell Fire and E.M.S., and the response to those comments (above).

Response to King County FPD No. 16 Comment #2, General Comments

The preferences noted in these comments are acknowledged. The Draft EIS has been searched electronically. The requested corrections have been made to the Summary in Final EIS Chapter 1. Corrections to Draft EIS Chapters 2 and 3 have been made by means of the Errata sheet (Final EIS Chapter 3).

Response to King County FPD No. 16 Comment #3 re: No Adverse Impact to Existing Fire Services

Phased implementation of the Bastyr University Campus Master Plan is projected to occur over a period of 25 years. It is acknowledged that it cannot be guaranteed that there will be no adverse impact to fire protection services across this span of time, given the conceptual nature of the Bastyr University proposal at the time of environmental review, and other anticipated (though as yet unidentified) growth within the King County Fire Protection District No. 16 service area. One purpose for early environmental review of the proposed action is to alert public service providers to the growth projections of this applicant, so that these factors can be included in the capital planning program of each public service provider.

Response to King County FPD No. 16 Comment #4 re: Increase in Emergency Calls During Construction

This comment is acknowledged. This correction has been made to the Summary (Final EIS Chapter 1), and Draft EIS Chapter 3 (Section 3.7.1) has been revised by means of the Errata sheet (Final EIS Chapter 3).

Response to King County FPD No. 16 Comment #5 re: No Significant Unavoidable Adverse Impacts to Fire, Emergency Medical Aid or Police Protection Services

This comment is acknowledged. The City and University expect to engage in ongoing coordination with King County Fire Protection District No. 16 during finalization of the Public Services Agreement, and during implementation of phased expansion of the Bastyr University campus. Also see response to King County FPD No. 16 Comment #3, above.

Response to King County FPD No. 16 Comment #6 re: Kenmore Comprehensive Plan Policy

This comment takes exception to an adopted City of Kenmore Comprehensive Land Use Plan Policy. If the City's support for a Northshore Fire Department service level of 1 firefighter per 900 persons should be modified, the City invites Fire Protection District No. 16 to participate in the next Comprehensive Plan update to revise this policy.

Response to King County FPD No. 16 Comment #7 re: Growth Projections

The wording preference indicated in this comment is noted.[1] The Summary (Final EIS Chapter 1) has been revised, and Draft EIS Chapter 3 (Sections 3.5.2.2 and 3.7.1) has been corrected by means of the Errata sheet (Final EIS Chapter 3).

Response to King County FPD No. 16 Comment #8 re: Traffic Accident Data

It is standard practice for traffic consultants to rely on the traffic accident records of the entity responsible for roadways within the transportation study area; in this case, WSDOT, the City of Kenmore, and King County. It is unknown why the Fire District would have different data, except to assume that some accidents were unreported. Since the comment indicates that traffic accident data are not currently available from the Fire District, no change has been made to Draft EIS Table 3.6.6-1. If the numbers differ significantly, and this is something that should be brought to the City's attention, FPD No. 16 is asked to provide this information to Bob Sokol, City of Kenmore Community Development Director, when data assimilation is complete.

Response to King County FPD No. 16 Comment #9 re: Back-up Agreements with Other Fire Agencies

The clarifications indicated in this comment have been added to Draft EIS Section 3.7.1 by means of the Errata sheet (Final EIS Chapter 3).

Response to King County FPD No. 16 Comment #10 re: First Response Team, Traffic and Weather

The clarifications indicated in this comment have been added to Draft EIS Section 3.7.1 by means of the Errata sheet (Final EIS Chapter 3).

Response to King County FPD No. 16 Comment #11 re: Washington State Surveying and Rating Bureau Rating of Northshore Fire Department

The clarifications indicated in this comment have been added to Draft EIS Section 3.7.1 by means of the Errata sheet (Final EIS Chapter 3).

[1] It was confirmed in a telephone communication with Deputy Fire Chief Tom Weathers that FPD No. 16 Comment #7 (fourth bullet item on page 2 of the District's November 3, 2004 letter) contains a typographical error. The last sentence of this comment should read: "It would be correct to state that no adverse impacts are expected based upon current district growth projections" (personal communication between Deputy Fire Chief Tom Weathers and Vicki Morris, Vicki Morris Consulting Services, EIS primary author, November 17, 2004). Written confirmation of this correction was requested in the form of a follow-up letter from Deputy Chief Tom Weathers to Bob Sokol, City of Kenmore Community Development Director.

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STATE OF WASHINGTON
WASHINGTON STATE PARKS AND RECREATION COMMISSION
7150 Cleanwater Lane • P.O. Box 42650 • Olympia, Washington 98504-2650 • (360) 902-8500
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Bob Sokol, Community Development Director
City of Kenmore, Department of Community Development
6700 NE 181st Street
Kenmore, WA 98028-0607

November 3, 2004

RE: Draft EIS Bastyr Campus Master Plan

Dear Mr. Sokol:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Bastyr Campus Master Plan. Because several specific accommodations with State Parks are named in the DEIS Fact Sheet(p. iii), I contacted Sandi Cutler, Vice President of Institutional Planning and Public Affairs at Bastyr University prior to drafting this comment letter. It is my understanding from an email exchange and from a phone conversation with Mr. Cutler that: 1) Bastyr has previously discussed a co-planning process with Parks Director Rex Derr and other Parks staff, and that there exists an assumption of a friendly verbal agreement as to the general direction and tone of the plan outlined in the DEIS and a plan to set up a joint task force (between Bastyr and Parks) once the EIS process is complete; and, 2) actual initial construction is 2-3 years out with enough lead time to develop written contractual authorizations with Parks on such specific and significant planning issues as parking, wetlands, and easements. (1)

As an immediate neighbor to the University campus, Parks will have ongoing interest in and concerns with the proposed widening and other traffic improvement on 145th. At this point in the planning process we request that construction impacts be optimally mitigated to minimize disturbance to Saint Edward State Park recreational users. (2)

The planned parking deficit at Bastyr will most likely be somewhat offset by the alternative transportation incentives outlined in the DEIS. However, it is my understanding that the University does not currently charge for parking and only recently implemented a permit system of any kind. Because cars (number of trips, amount of pollution, increase in traffic etc.) are one of the most easily identifiable environmental impacts for even well planned growth, Parks requests that the final EIS more fully address the issue of parking and that a plan for a fee based permitting system be implemented prior to construction. Adopting proactive policy and design strategies to make the expanded campus especially bicycle user friendly is another element of the (3)

deficit parking plan that could be improved in the final EIS. Bike friendly policy and planning elements might include construction of secure, covered bicycle parking as part of building design, night lighted connections to the local trail system (including the Burke Gilman), an on-campus bicycle repair shop(run by students), and equipping all shuttle vans and pooled vehicles with bicycle racks. (4)

Given the successful growth of Bastyr in its previous years of operation, the planned growth rate for the university seems conservative. As the DEIS points out, King County originally extended its conditional use permit to Bastyr with the understanding of a campus population roughly equivalent to the previous tenant. Instead, Bastyr's on-campus population tripled from approximately 445 in 1995 (permitted) to 1274 in 2003. Will the growth rate of the University be held to 3% per year regardless of increasing market demand for its programs? (5)

Bastyr has clearly gone above and beyond the minimum legal requirements of SEPA to make the campus master planning process a reflection of the integrative goals of the university mission statement. The university's clear awareness of the relationship between planned care of the environment and the natural health care that they are teaching their students is apparent throughout the DEIS. We at Parks look forward to working with you in the ongoing planning process. (6)

Sincerely,

Brigid

Brigid Dean
WCC Environmental Specialist

Cc: Deborah Petersen, Environmental Specialist
Randy Person, Parks Planner
Deaydra Wise, Central Files

RESPONSE TO COMMENTS RECEIVED FROM WASHINGTON STATE PARKS AND RECREATION COMMISSION

Response to Washington State Parks Comment #1 re: Bastyr Coordination with State Parks

The City of Kenmore shares the understanding described in this comment; i.e., that communications have been initiated between Bastyr University and the Washington State Parks and Recreation Commission concerning the formation of a joint task force to address site development issues that affect Saint Edward Park land and shared access via NE 145th Street. In response to this comment, the University confirmed their intent to initiate Phase 1 construction during summer 2006.

Response to Washington State Parks Comment #2 re: Construction Impacts Associated with Improvements to NE 145th Street

The City and University share the objective stated in this comment, as evidenced in the Draft EIS Public Services section (page 3-129):

> As an element of addressing emergency vehicle access requirements, careful consideration will continue to be given to balancing public safety requirements with a desire to minimize adverse impacts to neighboring properties and environmentally sensitive areas.

Also see Bothell Fire Marshal Comments #12, #13, and #26, and the responses to these comments earlier in this chapter.

Response to Washington State Parks Comment #3 re: Fee-Based Parking On-Campus

The University currently implements a Parking Management Plan that includes a permit system. No fee is currently charged; however, students, employees, and visitors are required to obtain a permit for on-campus parking. There were 671 parking spaces on the campus at the time of this writing, with a small number set aside for ADA-accessibility, faculty, adjunct faculty, and visitors. The University recently increased the staff allocation to managing the Parking and Transportation program from 0.85 FTE to 1 full-time person. Parking fees may be charged in the future, if this measure is deemed appropriate and effective to manage on-campus parking demand. The University currently pays a fee to Washington State Parks for overflow parking at Saint Edward Park during off-peak hours.

Carpooling is encouraged by providing several close-in parking stalls for carpool vehicles. Criteria to qualify for a carpool space include: a minimum of two persons, traveling together three or more days per week. There were 13 carpool spaces at the time of this writing. More will be added as carpooling increases.

The University offers a small number of free Metro Transit vouchers to encourage students and employees to ride the bus to campus. Bus service to the campus is presently limited, and not particularly convenient. The University has had several conversations with Metro Transit concerning programs to encourage alternate forms of transportation; e.g., vanpool, van share, and flex-car.

The University's Parking Management Plan will be monitored for effectiveness, with accountability to the City of Kenmore. Adjustments will be required, if necessary, to ensure that on-campus parking is not overwhelmed as campus build-out occurs.

Response to Washington State Parks Comment #4 re: a Bicycle User-Friendly Campus

The City and University share the objective described in this comment. At the time of this writing, the University provides covered parking for bicycles in excess of demand. As more people ride their bicycles to the University in the future, more bicycle racks will be added.

Response to Washington State Parks Comment #5 re: Campus Population Growth Rate

The Campus Master Plan and phased implementation proposal are designed and scheduled to accommodate growth in the student population at the rate described in the EIS. This managed rate of growth will also be a component of the Development Agreement to be executed between the City and University. If enrollment demand were to substantially increase in the future, the University would need to re-evaluate its Master Plan, and review the terms of the Development Agreement with the City. Impacts beyond those addressed in the 2004 EIS would likely require supplemental environmental review.

Response to Washington State Parks Comment #6 re: Compliments

The compliments expressed in this comment regarding the University's planning process, and the Washington State Parks and Recreation Commission commitment to working with the University in an ongoing planning process, are acknowledged.

Bob Sokol

From: Anthony L Cree [cree_anthony@verizon.net]
Sent: Wednesday, November 03, 2004 10:56 PM
To: Bob Sokol
Subject: Bastyr University Master Plan EIS

Dear Bob,

I've just completed reading through the Bastry University Master Plan EIS as posted on the City of Kenmore website. I'd like to voice my support for Alternative 3. In my opinion, the alternatives developed are sound, and would improve both Bastyr, and indirectly, the City of Kenmore. It's my belief that higher education is important to a community, and supporting the growth of Bastyr is important. I'm impressed that Bastry has both set modest growth goals, and has planned so thoroughly when preparing to accommodate the additional students. That being said, this area of Kenmore serves a broad range users. In particular, the forested area near Juanita serves to provide connectivy between St. Edward State Park, and Big Finn Hill park. Maintaining this piece in a forested state is important to both wildlife, and the many trail users who frequent this area. Personally, I'm a long time mountain biker (and until very recently a Kenmore resident), and utilize the 'tie trail' that runs through this area to connect the St. Edward trails with the Big Finn Hill trails to create a riding experience that 'feels' much larger and more rural than it is. I believe Alternative 3 is the best choice because it allows Bastyr room to grow, satisfies most of their needs, while still preserving this area of forest for both trail users and wildlife. The piece of forestland connecting St. Edward State Park to Big Finn Hill serves an important purpose in that helps create a system of parks and trails very unique in the greater Seattle area. I'm aware of no other location that provides such a trail system mere minutes from the heart urban areas and housing. I urge you to support Alternative 3 of this plan.

Thanks,

Anthony

Anthony L. Cree
anthony@lifetime.oregonstate.edu
phone: 425-776-5114
cell: 425-772-8389
4819 183rd PL SW
Lynnwood, WA 98037

RESPONSE TO COMMENTS RECEIVED FROM ANTHONY CREE

Support expressed for Bastyr University Campus Master Plan Alternative 3: No Public Clinic is acknowledged.

Also see the letter of comment submitted by Tom Fitzpatrick, and the response to Tom Fitzpatrick Comment #3 (following).

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t-cfitz@comcast.net

November 4, 2004

Bob Sokol, Community Development Director
City of Kenmore
Department of Community Development
6700 NE 181st St.
Kenmore, WA 98028-0607

RE: Bastyr University Campus Master Plan Draft Environmental Impact Statement

Dear Mr. Sokol:

Thank you for the opportunity to comment. I especially appreciate the kindness and courtesy of your staff, who loaned me a print copy of the Draft Environmental Impact Statement (DEIS) at City Hall when I was unable to attain online access to its maps and figures.

As a Kenmore resident I am very glad our city is home to Bastyr University and hope its Master Plan is feasible to achieve with acceptable impacts. The concerns I have with the proposed action relate to transportation/traffic safety, drainage/landslide hazards, recreation, aesthetics and public process.

1. Transportation/Traffic Safety

A Along with your consultants, I believe signalizing the intersection of NE 145th St. and Juanita Drive (the current entrance to both St. Edward State Park and the Bastyr campus) will improve its capacity and safety. However, I am concerned about the proposed action's longterm effects on Juanita Drive. The DEIS states that Juanita Drive is scheduled to be expanded to a three-lane road from NE 170th (Simonds Rd.) south to the city limits, which would help mitigate the proposed action's increased northbound trips. But the DEIS is silent on what will happen to Juanita Drive south from that point, even though Figure 3.6.2-6 states 26 percent of student trips and 29 percent of faculty trips use that road. The Master Plan's proposed on-campus housing will really help, but if I understand the 2020 projections correctly, these southbound trips will increase significantly and there is no discussion of how they will get through the Juanita area; I question the feasibility of widening Juanita Drive through that area. There have been some pedestrian fatalities on Juanita Drive, and it is a very popular bicycling route as well; I'm very concerned about the impacts on pedestrians and cyclists, especially to the south of Bastyr.

B

I also am very concerned about the traffic safety impacts of the proposed public clinic (approximately at NE 143rd St.). It is very close to the corner of Juanita Drive and Holmes Point Drive (NE 141st), a very busy signalized intersection. It's difficult to read the site plan, but the parking area for this clinic would appear to have an ingress/egress very close to NE 145th (entrance to the campus and state park). If the entrance(s) to this parking lot were signalized it might be safer, but one can already see the severe impact on congestion of having signalized intersections close together every morning and evening on 68th Avenue NE between SR 522, NE 173rd St. and NE 170th St.

2. Drainage/Landslide Hazards

The DEIS states that the Bastyr campus is divided into three drainage basins: Basin 1 along the existing entrance road (NE 145th St.) and Juanita Drive, and Basins 2 and 3 where the existing buildings, access road and playing fields are located. My two main concerns are the public clinic and part of the low-density housing proposed to be located in Basin 1, and the portion of the new/extended perimeter road that would be located along the south/southeast property line abutting the ravine that contains part of the state park as well as the northern portion of Holmes Point Drive.

The entire Holmes Point area, St. Edward State Park and the Bastyr campus are near the bottom of a larger drainage basin extending east of Juanita Drive; this area has already been heavily damaged by urban development over the past half-century. The remaining undeveloped areas are the most fragile, for example the various ravines within the state park, abutting the Bastyr campus, and the Holmes Point area. They are also significantly more subject to flooding and possible consequent land slides than they would have been if the upper part of the drainage basin had either remained forested or been developed using more modern drainage standards. Therefore, I do not believe the drainage impacts of developing the public clinic proposed to be located in Basin 1 can be rendered acceptable. If extraordinary measures were taken (e.g. collecting runoff and pumping it to underground vaults in Basin 2), perhaps the portion of the low-density housing proposed for Basin 1 could have acceptable impacts.

I didn't see a specific rationale for the proposed perimeter road in the DEIS, but in general I would favor a pedestrian-oriented campus design, and pushing cars to the edge would certainly encourage this. However, in this case "the edge" is a very steep-sided ravine that contains part of Holmes Point Drive. Due to the major storms at the end of 1996, a part of the north end of Holmes Point Drive slid out; its reconstruction took over a year, and cost the taxpayers millions of dollars. I'm very concerned about the portion of the perimeter road proposed to be extended from the southwest corner of the existing Campus Meadow. Runoff from this road and its construction could result in landslides that endanger Holmes Point Drive, again costing the taxpayers millions of dollars(not to mention Bastyr University if the perimeter road itself were damaged). I strongly recommend that Bastyr and the City of Kenmore evaluate an alternative providing access to the campus with two cul-de-sac roads branching from the new main campus entrance, and eliminating all or most of the proposed perimeter road along the edge of the ravine.

3. Recreation

Bastyr University occupies a site within, and part of, a regionally important park and open space resource. Not only does it share its access road with St. Edward State Park, but it sits astride a trail system that connects the state park with King County's Big Finn Hill Park, accessing a combined area of over 600 acres of open space. Over the years a rudimentary trail system has become a major resource for day hikers, pedestrians going to and from the Inglewood Village shopping center, mountain bikers, individual trail runners, and school cross-country track teams. A network of trails, with multiple access points to Juanita Drive, connects the confluence of the Juanita, Volunteer and Entrance Trails in St. Edward State Park to the trail network in Big Finn Hill Park starting south of Holmes Point Drive. The result is a "whole-is-greater-than-the-sum-of-its-parts" trail resource that was probably totally unanticipated by state and county land managers when these parks were created. Therefore, the proposed public clinic that would be located along Juanita Drive at about NE 1443rd St. would have a significant adverse impact on recreation all out of proportion to its size (1.4 acres).

The DEIS is totally silent on the proposed action's impact on public parks and recreation. The Final EIS needs to address this issue, consistent with the City of Kenmore's Comprehensive Plan (e.g. the plan's Vision Statement says Kenmore in 2020 will be a city that "that actively protects natural and environmentally sensitive areas, significant open space, and trees..." and has "a network of parks, trails, open spaces, and recreational facilities providing for passive and active recreation..."). While loss of the Campus Meadow ball fields will be an issue, they do not get anywhere near the use of the ball fields in St. Edward State Park. This issue pales in comparison to the possible significant adverse impact to the regionally important two-park trail system of the proposed public clinic.

4. Aesthetics

I agree with the DEIS's assessment that without the proposed public clinic, visual impacts of the proposed action along Juanita Drive would be very minor. I didn't see any discussion of mitigation for the proposed campus loop road's impacts on St. Edward State Park; I would hope for a very dense planting buffer, retaining as much of the existing forest cover as possible, per the "landscape framework" (Figure 2.6.1-3).

5. Public Process

A I note from the Distribution List (App. 5) that the EIS was not sent to the King County Parks Division. In view of the regionally important recreation resource created by the proximity of St. Edward State Park, the Bastyr campus and King County Big Finn Hill Park, I believe it is essential that their comments be solicited. Therefore, if you have not received a comment from them, I request the comment period be extended and that they be provided a copy of the DEIS.

Also, I live very close to St. Edward State Park, and frequently walk or ride the trails there and in Big Finn Hill Park. I also have attended a couple meetings of Friends of St. Edward Park. Until I saw a letter to the editor in yesterday's *Kenmore Reporter*, I had no idea this proposed action was this far along and did not know there was a DEIS out. The property should have been posted, just like you would expect for a subdivision (or even a short plat!). I think you should do more community outreach and explain the potential scope of this project before you close the comment period.

B

In closing, let me reiterate my general support for Bastyr University. I think a modifed Alternative 3 (no public clinic) would mitigate the concerns I've stated here and still accomplish the University's goals. If a public clinic that is physically separated from the rest of the campus is still something they want to do, I suggest they seek space within or adjacent to the existing Inglewood Village shopping center. Thanks again to you and your staff for affording me the opportunity to comment.

6

Sincerely,

Tom Fitzpatrick

cc via email:

Tom Koney, Acting Assistant Director, King County Parks Division
Justin Vander Pol, Executive Director, Backcountry Bicycle Trails Club

RESPONSE TO COMMENTS RECEIVED FROM TOM FITZPATRICK

Response to Tom Fitzpatrick Comment #1A re: Traffic Safety on Juanita Drive NE, South of NE 145th Street

The Draft EIS evaluated the prospective impacts of Bastyr University expansion at two intersections on Juanita Drive NE, south of the City limits: NE 141st Street/Holmes Point Drive/Juanita Drive NE, and NE 122nd Street/Holmes Point Drive NE/Juanita Drive NE. Level of service (LOS) for these intersections with and without the project was calculated and presented in Draft EIS Table 3.6.3-2 (page 3-107). The analysis showed that both intersections would continue to operate at acceptable levels of service in the year 2020 with the Master Plan proposal (Alternative 1), projected to have the highest trip generation rate of the alternatives evaluated in the EIS.[2] The increase in delay at these intersections would be relatively modest. The next signalized intersection to the south is an intersection in the City of Kirkland at NE Juanita Drive/NE 116th Street/100th Avenue NE. This intersection was recently upgraded to accommodate new development on the northwest corner of the intersection. It is not likely that Bastyr University would need to make further upgrades to this intersection since the project, in the year 2020, is estimated to increase traffic at this intersection on the order of less than 3 percent.

It is recognized that there are many unsignalized intersections and driveways along this section of Juanita Drive NE where turns must occur without the benefit of a center left-turn lane. Left turns from Juanita Drive NE can cause delays to following traffic, and some motorists have been observed to drive illegally on the shoulder to bypass a car waiting to turn left. However, the need for a center left-turn lane exists today and will continue in the future with or without Bastyr University campus expansion. Project traffic would represent a small percentage of the traffic on Juanita Drive NE, and would not create the need for a center left-turn lane.

Response to Tom Fitzpatrick Comment #1B re: Traffic Safety Associated with the Proposed Public Clinic on Juanita Drive NE

Heffron Transportation, Inc. (the EIS traffic consultant) reviewed potential locations for driveway access to the proposed Public Clinic along the west side of Juanita Drive NE, and determined that the best location would be approximately 145 feet north of the centerline of NE 143rd Street. The EIS traffic consultant recommended a single driveway to serve the Public Clinic (rather than the two driveways shown on conceptual site plans), located on the tangent section of a horizontal curve where adequate sight lines would be available in both directions. Moving the driveway further south would reduce the sight line to the north, and vice versa. The recommended location would be approximately 455 feet from NE 145th Street, which is adequate spacing, and would be located outside of the queuing area for the future signal at the intersection of NE 145th Street with Juanita Drive NE.

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[2] Because there is no specific residential care facility proposal under Alternative 4 at the time of this writing, the actual number of patients, staff, and visitors could not be specifically quantified or projected. Similarly, the year in which a facility of this type might locate to the site is unknown, as are the hours of operation, the hours during which shift changes would occur, and other factors that affect trip generation and traffic volume impacts on the area roadway system. For this reason, no attempt was made in the Draft EIS to quantity offsite transportation system impacts or mitigation requirements for Alternative 4, which could exceed projections for the Master Plan proposal (Alternative 1). If a residential care facility is proposed for the Bastyr University campus at some future time, it would likely require supplemental environmental review.

Several mitigation measures were recommended in the Draft EIS (page 3-112) for the Public Clinic driveway, including:

- Move an existing King County Metro transit stop sign currently located immediately south of the proposed driveway location. Locate the sign south of the driveway.
- Clear brush on the west side of Juanita Drive NE south of the Public Clinic driveway to increase sight lines.
- Extend the existing center lane on Juanita Drive NE south to connect with the southbound left-turn pocket for NE 143rd Street, and convert the section adjacent to the proposed driveway location to a center turn lane to allow storage spaces for vehicles that would turn left in and out of the new Public Clinic driveway.

The Draft EIS also determined that the Public Clinic driveway access onto Juanita Drive NE would operate at LOS C or better during the PM peak hour in 2020 with the Master Plan proposal (Alternative 1) or Reduced Low-Density Housing (Alternative 2). The City of Kenmore considers LOS B and LOS C to be acceptable operating conditions during the PM peak hour. Therefore, a signal would not be needed at the Public Clinic driveway.

Response to Fitzpatrick Comment #2 re: Drainage and Landslide Hazards

Drainage Basin 1 is currently forested and drains to a series of wetlands located in the northeast corner of the Saint Thomas Center site occupied by Bastyr University. Hydrologic modeling of Basin 1 will consider the existing land cover and evaluate the runoff control that Bastyr University will need to install to protect wetlands and surrounding properties. Water quality issues will also be addressed based on the amount of pollutant-generating impervious surfaces (i.e., areas subject to vehicular traffic) to be developed on the campus.

City of Kenmore Municipal Code and the *King County Surface Water Design Manual* will guide design of the onsite stormwater management system to serve the campus expansion proposal. Bastyr University will follow the regulations and requirements for water quality and runoff control. Runoff control will be designed to match the peaks and durations of developed site runoff to the existing runoff peaks and durations.

The perimeter road (referred to as the campus loop road throughout the EIS) will likely drain to Basin 2. The discharge location for Basin 2 is the existing wetland located in the northwest corner of the property at the entrance to the University from NE 145th Street (see Draft EIS Figure 3.3.1-2, page 3-24). Stormwater runoff will be collected from the pavement, and will be treated and detained to meet flow control and water quality requirements for development within the City of Kenmore.

City of Kenmore Municipal Code and the *King County Surface Water Design Manual* consider landslide areas and steep slopes for runoff control requirements (see discussion and illustrations in Draft EIS Section 3.1, Earth, pages 3-1 through 3-9). Mitigation measures identified in the Draft EIS Earth section recommend moving the campus loop road back from steep slopes around the perimeter, unless site-specific geotechnical investigations indicate that the proximity shown on conceptual site plans can be safety accommodated. A continuous loop road for access to structures around the entire perimeter of the campus is required for fire protection and emergency vehicle access.

Stormwater is not allowed to discharge on steep slopes, and runoff flow rates may not exceed existing conditions. Flow control measures to be installed concurrent with campus expansion will include detention ponds or vaults in combination with conveyance and an outfall designed to protect the

surrounding area. Dispersal trenches and energy dissipaters are common elements of stormwater systems to prevent erosion near steep slopes and landslide areas. While the onsite stormwater management system is not yet designed, these measures are likely to be included under the guidance of the Kenmore Municipal Code and *King County Surface Water Design Manual*.

The majority of the Bastyr University site does not discharge runoff to Holmes Point Drive NE drainage courses. More than 20 acres of the site drain to the north and west of existing structures on the campus. Offsite flow from Juanita Drive NE and the neighboring community to the east does not drain onto the Bastyr University property. Drainage is conveyed in pipes and roadside ditches along Juanita Drive NE and Holmes Point Drive NE.

Response to Tom Fitzpatrick Comment #3 re: Recreation

The unique connectivity of informal trails between large, regionally-important parks through the Bastyr University property adjacent to Juanita Drive NE is acknowledged. The Public Clinic site is located on a small knoll adjacent to the west side of Juanita Drive NE, above trails at the bottom of the ravine. Construction of the Public Clinic at this location might obstruct one (or some small number of) earthen trail(s) up the east side slope of the ravine. These have actually become sites of erosion concern. If the University chooses to construct the Public Clinic under Alternative 1 or 2 evaluated in the EIS, this use would not obstruct the informal trails along the bottom of the ravine that connect Saint Edward Park with Big Finn Hill Park. The clinic would, however, be visible from these trails.

Parks and Recreation was not identified during the EIS Scoping process as a required element of study, because no direct impacts to offsite parks and recreation would occur as a result of implementing the Master Plan proposal or site plan alternatives. The relationship of the campus expansion proposal to the surrounding community is discussed in Draft EIS Section 3.5.1 (pages 3-48 through 3-51). The relationship of the proposal to City-wide park and recreation goals and policies was addressed in Draft EIS Section 3.5.2, Relationship to Plans, Policies and Regulations (pages 3-55 through 3-82); see in particular the discussion of the Comprehensive Plan Vision Statement (Draft EIS pages 3-55 through 3-57); and the Comprehensive Plan Parks, Recreation, and Open Space Element (Draft EIS pages 3-70 and 3-71).

Response to Tom Fitzpatrick Comment #4 re: Aesthetics

The landscaping proposal for the campus loop road has not yet been prepared at this conceptual level of Master Plan review. Visual screening will be addressed during the site development approval process.

The campus loop road would be most visible to Saint Edward Park users along NE 145th Street. At other locations, the campus loop road is proposed around the perimeter of the plateau on which the Bastyr University campus is located, several feet above the informal trail system through wooded ravines that border the site on the east, south, and west. The campus loop road will be setback from the edge of the plateau (see the response to Tom Fitzpatrick Comment #2, above), and no tree removal is proposed from the wooded slopes. These slopes are not within the Bastyr property boundary. Tree retention in these areas is important for slope stability.

Response to Tom Fitzpatrick Comment #5A re: Soliciting Comments from King County Parks

King County Parks is a division of the King County Water & Land Resources Department, to which a copy of the Draft EIS was sent (Draft EIS Distribution List, Chapter 5). The King County Parks Division has been separately added to the Final EIS Distribution List (Chapter 4).

The City of Kenmore has not extended the Draft EIS comment period to solicit comments from King County Parks, as this agency does not have jurisdiction over the proposed action, and there will be no direct or indirect adverse impacts to Big Finn Hill Park as a result of the Bastyr University Campus Expansion proposal. See the response to Tom Fitzpatrick Comment #3, above.

Response to Tom Fitzpatrick Comment #5B re: Community Outreach

Bastyr University held two community outreach meetings during development of the Campus Master Plan. These were advertised by the University in the *King County Journal* and *Bothell-Kenmore Reporter*. Fliers were also posted at the Inglewood Village shopping center at the intersection of Juanita Drive NE/NE 141st Street (Holmes Point Drive NE), at Kenmore City Hall and Police Department, and in local stores in the shopping center that surrounds City Hall at 6700 NE 181st Street in Kenmore.

Kenmore Community Workshop	9/04/02
Kenmore Community Workshop	10/16/02

The City of Kenmore held two public meetings during the EIS process. These were advertised in the *King County Journal* and *Bothell-Kenmore Reporter*:

	Date Advertised	**Meeting Date**
EIS Scoping Meeting	6/24/03	7/08/03
Combined Notice of Draft EIS Availability and Public Meeting to Receive Comments on the Draft EIS	10/04/04	10/27/04

Attendance at these meetings was not large. Fifteen to 20 people attended the community workshops on the Campus Master Plan. Ten to fifteen people from the community attended the EIS Scoping meeting. The public meeting to receive comments on the Draft EIS did not formally convene due to the absence of an audience.

Notice of Availability of the Draft EIS was mailed to 1) interested individuals who identified themselves at the EIS Scoping meeting, and to adjacent property owners within 500 feet of the Bastyr University campus on October 4, 2004; 2) posted on the City's website October 4, 2004; and 3) published in the *King County Journal* and *Bothell-Kenmore Reporter* on October 6, 2004. The City's public notice practices are in accordance with Kenmore Municipal Code requirements for a project at this stage of review, which do not include posting the property. Additional opportunities for public comment, including formal public hearings before the Kenmore City Council, will occur 1) during the City of Kenmore Comprehensive Plan and Zoning Code amendment process to implement the Campus Master Plan; and 2) on the proposed Development Agreement between the City of Kenmore and Bastyr University. Opportunities for public comment will also occur during commercial site development approvals and permit issuance over the 25-year phased implementation of the campus expansion proposal. Notice of these opportunities to comment will be provided to all parties of record identified during the EIS process. Signs will also be posted onsite in conjunction with the proposed Zoning Code amendments and future site development approvals.

Given the opportunities for future comment at later stages of this process, the City of Kenmore has chosen not to extend the Draft EIS comment period.

The City and University appreciate Mr. Fitzpatrick's interest in Saint Edward State Park and the community as expressed in these comments. Mr. Fitzpatrick (and the other person who submitted a letter of comment on the Draft EIS) has been added to the Final EIS Distribution List, and to the list of parties of record to receive future notices of proposed actions on the campus.

Response to Tom Fitzpatrick Comment #6 re: Alternate Public Clinic Location

It would be inconsistent with the University's objectives to seek an offsite commercial location for the Public Clinic, on property they don't own. At the time of this writing, the Master Plan proposal (Alternative 1) is still the University's preferred alternative. The phasing proposal identifies the Public Clinic as a Phase 3 project element (2016–2020). Many circumstances will change between now and then, including University decision makers responsible for confirming whether to proceed with the Public Clinic. The purpose of the Campus Master Plan is to identify the range of desired uses for campus expansion over the next 25 years. Actual implementation may differ somewhat, subject to the Planned Action Ordinance and/or Development Agreement executed between the City and the University, or subject to modification of these agreements and possible supplemental environmental review.

3.0 ERRATA SHEET

This section contains minor corrections to the Bastyr University Campus Master Plan Draft EIS (October 5, 2004) that do not change the substantive analysis of the proposed action or alternatives. These corrections are made to 1) update factual information, and 2) correct the wording of the Draft EIS in response to requests made in comments received (Final EIS Chapter 2).

Chapter 1. Summary

Note: The Summary included in this Final EIS replaces the Summary in the Draft EIS. Where minor clarifications in wording were requested in comments received, these are tracked (i.e., underscored) in Final EIS Chapter 1 for ease of recognition.

Chapter 2. Alternatives Including the Proposed Action

Section 2.4.3, Proposed Level of Use, Table 2.4.3-1 (page 2-10).
Reduction in Phase 1 projected population. Student enrollments were below expectations for 2004; therefore, the University now projects an on-campus student and employee population not exceeding 1,274 for the year 2010 – a reduction of approximately 1.5 percent.

Table 2.4.3-1. Bastyr University campus population growth projections: proposed level of use.

Year	Students	Faculty and Staff	Total	Total On-Campus
2003	1,034	240	1,274	1,274
2010	1,392	282	1,674	1,274 [1]
2015	1,648	321	1,969	1,569
2020	1,926	365	2,291	1,891
2025	2,250	406	2,666	2,266
2030	2,630	464	3,094	2,694

[1] Approximately 400 students are projected to relocate to off-campus instructional spaces by Spring 2005.

Section 2.6.1.5, Secondary (Emergency Vehicle) Access, paragraph 1 (page 2-25).
Revise second sentence, as follows:

Bastyr University and Saint Edward State Park share a common entry roadway, NE 145th Street. Discussions with King County Fire District #16 (Northshore Fire ~~District~~ Department) ~~16~~ indicate that a second egress route and improved emergency vehicle access will be required to serve proposed development that would increase the level of use of the Bastyr site (personal communication with Tom Weathers, Deputy Fire Chief, Northshore Fire ~~District 16~~ Department, September 24, 2004).

Section 2.6.1.5, Secondary (Emergency Vehicle) Access, paragraph 4 (page 2-25).
Revise reference to Opticom pre-emption devices, as follows:

Either the north or south alternative would serve emergency vehicle access only, and would not be open to general traffic use. As such, both ends of the roadway would be equipped with Opticom-activated gates

(or some other pre-emption device preferred by the Fire Department and City Fire Marshal at the time approvals are sought) for use by emergency service providers.

Section 2.6.3, Phased Development Proposal, Table 2.6.3-1 (page 2-36).
Table excerpt reproduced here to correct 2010 campus population projection, for the reason described above.

Table 2.6.3-1. Bastyr University Campus Master Plan phased development proposal.

Phase	Years	Proposed Improvements	Students	Employees	On-Campus Population [1]
Present	2003		1,034	240	1,274
1	2006-2010	Construct 2 new academic buildings and 2 High-Density Housing clusters. Begin to establish new campus entry.	1,392	282	1,274
2	2011-2015	Construct 4 new academic buildings and the proposed new entrance road to the campus. Complete the new gateway plaza, water feature, and entry landscaping. Renovate existing building. Eliminate existing dormitory housing. Add 4 Low-Density and 1 Medium-Density Housing clusters.	1,648	321	1,569
3	2016-2020	Construct 2 new academic buildings, the final housing units (4 High-Density Housing clusters), and the Public Clinic adjacent to Juanita Drive NE.	1,926	365	1,891
4	2021-2025	Complete the academic complex east of the existing building.	2,250	416	2,266
5	2026-2030	Complete major development of the campus: construct final academic building, and the Wellness Center/ Conference Center.	2,630	464	2,694
	Build-Out		**2,630**	**464**	**2,694**

Section 2.6.3, Phased Development Proposal, Subsection 2.6.3.1, Phase 1
Last paragraph (page 2-36).
Revise first sentence of this paragraph as follows:

The campus population growth projection for Phase 1 is ~~237~~ 218 staff and students. By 2010, there would be an estimated ~~1,011~~ 992 on-campus students and approximately 282 faculty/staff,[1] for a total on-campus population of ~~1,293~~ 1,274.

[1] Faculty-staff projections include approximately 20 employees associated with the Leadership Institute of Seattle (LIOS), co-located with the University on the Bastyr campus.

Chapter 3. Affected Environment, Potential Impacts, and Mitigation Measures

Section 3.5.2.1, Relationship to Plans, Policies and Regulations
City of Kenmore Comprehensive Plan, Public Services Element
Public Services – Discussion, paragraph 1 (page 3-73).
Revise the third sentence as follows:

Adequate provision for emergency services, particularly secondary emergency vehicle access, is a key issue for the Master Plan proposal or any site plan alternative. The current status of planning for improved emergency access to the Bastyr University site is described in Draft EIS Subsection 2.6.1.5. The overall relationship of the campus expansion proposal to existing services provided by King County Fire District #16 (Northshore Fire ~~District~~ Department) ~~16~~ and the Kenmore Police Department is discussed in Section 3.7.

Section 3.5.2.2, Relationship to Plans, Policies and Regulations
Kenmore Municipal Code: City-Wide Regulations
International Fire Code and Building Code Regulations, paragraph 1 (page 3-79).
Revise the first sentence of this paragraph as follows:

The relationship of the Master Plan proposal or site plan alternatives to the ~~International~~ Fire ~~Code~~ and ~~International~~ Building Codes in effect at the time Building Permit applications are submitted is preliminarily discussed in Draft EIS Chapter 2, Subsection 2.6.3, *Phased Development Proposal*.

Section 3.5.2.2, Relationship to Plans, Policies and Regulations
Kenmore Municipal Code: City-Wide Regulations
Adequate Public Facilities and Services, paragraph 1 (page 3-79).

The City of Kenmore Police Department ~~and Northshore Fire District 16~~ representative~~s~~ contacted during preparation of this Draft EIS regarding the Bastyr University campus expansion proposal confirmed that the University's growth projections are within the range anticipated for the~~ir~~ service area~~s~~, and would not adversely impact existing levels of service, manpower or equipment projections. The Northshore Fire Department representative confirmed that no adverse impacts are expected based upon current Fire Protection District No. 16 growth projections (Draft EIS, Section 3.7). The exception to this no-impact determination is current limitations to emergency vehicle ingress and egress to the site, being addressed at the time of this writing by the City, University, Washington State Parks, and Northshore Fire ~~District 16~~ Department as described above.

Section 3.6.4, Site Access, Other Recommended Mitigation Measures
First sentence (page 3-112).
Revise as follows:

Under the Master Plan proposal or any site plan alternative, ~~it is recommended that~~ speed humps ~~be installed~~ on NE 145th Street ~~to~~ would reduce the travel speed of drivers traveling east and west. ~~This improvement would enhance safety in the vicinity of the intersection of the campus loop road due to limited sight distance. Speed humps would also be appropriate given that this is the access road to Saint Edward State Park and speed humps are often used to calm traffic in parks.~~ Speed humps are not permitted, however, on roadways designated as Fire Department access roadways, as NE 145th Street is and will continue to be.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Affected Environment, paragraph 1 (page 3-126).
Revise as follows:

The fire station nearest the Bastyr University site is Station ~~51~~ 57, the Northshore Fire ~~District~~ Department headquarters, at 18030 73rd Avenue NE in Kenmore. This station is approximately ~~2.5~~ 3.5 miles north~~west~~ of the Bastyr University site, east of the intersection of Juanita Drive NE with SR-522. Station ~~51~~ 57 is generally the first-response station to the campus, though a central, computerized dispatching system searches for the closest available truck and battalion at the time of a 9-1-1 call. The Northshore Fire ~~District~~ Department has ~~back up~~ automatic-aid agreements with all ~~nearby municipalities, including (but not limited to)~~ fire agencies within Zone 1 of King County. These include the fire departments of Shoreline, Bothell, Kirkland, ~~Lake Forest Park, Bothell and~~ Redmond, Woodinville, Bellevue, Duvall, Mercer Island, and Eastside Fire and Rescue. In addition, mutual-aid responses are provided by Seattle and many Snohomish County fire departments. The Kirkland fire station is approximately 2.5 miles southeast of the site; Lake Forest Park is approximately 3.5 miles northwest of the site; and ~~Bothell~~ a Shoreline station is about ~~6.5~~ 6 miles north~~west~~~~east~~ of the site. All stations within the service area are ~~manned~~ staffed 24 hours per day.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Affected Environment, paragraph 2 (page 3-126).
Revise as follows:

The first response to a ~~9-1-1 call for~~ reported fire ~~protection services~~ would include three engines, one ladder truck, ~~and~~ one battalion chief, ~~of firefighters~~ one rescue truck, one medic unit, and one medic supervisor. The ~~second response to the site~~ first-arriving unit would normally arrive within less than 5 minutes. All stations within the service area regularly review their response times~~, and currently~~ to ensure compliance~~y~~ with national standards ~~more than 90 percent of the time~~. Traffic and weather are occasional constraints to response time. SR-522 is the primary access route for all first-response units to the Bastyr University campus with the exception of the engine from Kirkland, which would respond from Juanita Drive NE~~the Northshore Fire District, Lake Forest Park, and Bothell Fire Departments, and is at times congested~~. Juanita Drive NE can also be congested, and is the only arterial access to the Bastyr University site. The bridge across the Sammamish Slough on Juanita Drive in the vicinity of NE 170th Street has been inspected for the purpose of a seismic rating, and has been certified structurally sound, so there are no structural constraints to access, only traffic volume and occasional weather issues.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Affected Environment, paragraph 5 (page 3-127).
Revise as follows:

The Washington State Surveying and Rating Bureau rating of the Northshore Fire ~~District~~ Department is Class 4. Ratings range from 1 to 10, where one is the highest, and are based on water supply, suppression equipment, communications, and fire safety control features. The Fire Department has requested a ~~District qualifies for a Class 3~~ rating review, with the ~~exception that it does not currently own a ladder truck~~ goal of obtaining a Class 3 rating.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Potential Construction Impacts, paragraph 1 (page 3-127).
Revise as follows:

The Northshore Fire ~~District~~ Department tends to experience a higher volume of fire and emergency medical aid calls during construction activity, due to safety hazards associated with construction

practices, and changing conditions that result in uncertainty for workers onsite and persons traveling through construction areas. Given the proposed 25-year construction period for Bastyr University campus build-out, the Fire Department anticipates that a general increase in traffic volumes across this span of time will also contribute to a higher volume of fire and emergency aid calls during construction.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Potential Operational Impacts, paragraph 1 (page 3-128).
Revise as follows:

The rate of growth projected to occur with the Bastyr University Campus Master Plan proposal or any site plan alternative is within the anticipated rate of growth within the Northshore Fire ~~District~~ Department service area~~,~~. ~~and therefore is not expected to~~ No adverse~~ly~~ impacts to ~~the~~Fire Protection District No. 16 in terms of demand for manpower or equipment are anticipated based upon current District growth projections.[2]

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Mitigation Measures, *Incorporated Plan Features* (page 3-128).
Revise as follows:

The private~~, all-weather surface of the~~ asphalt- or concrete-paved campus loop road would be designed and constructed to standards that would support emergency vehicle access to proposed structures and uses around the perimeter of the site.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Mitigation Measures, *Applicable Regulations and Commitments*, paragraph 1 (page 3-128).
Revise the second sentence of this paragraph as follows:

Prior to seeking development approvals to implement the Campus Master Plan, the University would develop site design documents to a level that would show additional features for compliance with the ~~International~~ Building ~~Code~~ and ~~International~~ Fire Code in effect at the time Building Permit applications are submitted. These features would include, but not necessarily be limited to a looped water system within the campus loop road, hydrant spacing adequate to serve proposed structures, spacing between buildings to provide adequate separation and emergency vehicle access, and ~~all-weather surface~~ asphalt- or concrete-paved access adjacent to buildings.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Mitigation Measures, *Applicable Regulations and Commitments*, last paragraph 1 (page 3-129).
Revise as follows:

The University maintains and proposes to enhance a campus safety program that includes orientation training for new students and campus visitors, as well as established procedures for verifying alarms ~~and directing fire fighters to the location of fires or other emergencies~~.

[2] It was confirmed in a telephone communication with Deputy Fire Chief Tom Weathers that Fire Protection District No. 16 Comment #7 (fourth bullet item on page 2 of the District's November 3, 2004 letter) contains a typographical error. The last sentence of this comment should read: "It would be correct to state that no adverse impacts are expected based upon current district growth projections" (personal communication between Deputy Fire Chief Tom Weathers and Vicki Morris, Vicki Morris Consulting Services, EIS primary author, November 17, 2004). Written confirmation of this correction was requested in the form of a follow-up letter from Deputy Chief Tom Weathers to Bob Sokol, City of Kenmore Community Development Director.

Section 3.7.1, Fire Protection and Emergency Medical Aid Services
Mitigation Measures*, Other Recommended Mitigation Measures*, paragraph 3 (page 3-129).
Revise as follows:

The Fire Department may ~~recommend~~ require measures such as temporary sprinkler systems and/or 2-hour rated fire doors between building occupants and areas of a building under construction or under renovation, to minimize fire hazards to the onsite population during construction.

4.0 DISTRIBUTION LIST

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Attn: Bob Sokol, Director of Community Development
P.O. Box 82607
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Kenmore, WA 98028-0607

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6700 NE 181st Street
Kenmore, WA 98028-0607

📖 **City of Kenmore Police Department**
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6700 NE 181st Street
Kenmore, WA 98028-0607

TECHNICAL CONSULTANTS TO THE CITY OF KENMORE

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5309 Shilshole Avenue NW
Seattle, WA 98107-5344

📖 **GeoEngineers**
Attn: Tom Tobin, City Geotechnical Engineer
8410 154th Avenue NE
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Seattle, WA 98104-4421

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Seattle, WA 98109-5217

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720 Olive Way, Suite 1200
Seattle, WA 98101-1867

📖 **Jones & Stokes**
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Bellevue, WA 98005-1946

📖 Sent a Copy of the Final EIS
✉ Sent a Notice of Availability

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🕮 **King County Department of Development and Environmental Services**
Attn: SEPA Review
900 Oakesdale Avenue South
Renton, WA 98055-1212

🕮 **King County Parks Division**
Director's Office
Attn: Tom Koney, Acting Assistant Director
201 S. Jackson Street
Seattle, WA 98104

✉ **King County Wastewater Treatment Division**
Environmental Planning Supervisor
Attn: Ms. Shirley Marroquin
201 South Jackson, M/S KSC-NR-0505
Seattle, WA 98104-3855

🕮 **King County Water & Land Resources**
201 South Jackson Street, #600
Seattle, WA 98104-3854

✉ **Snohomish County Department of Planning and Community Development**
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3000 Rockefeller Avenue, M/S 604
Everett, WA 98201-4046

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Environmental Health Supervisor
999 Third Avenue, Suite 700
Seattle, WA 98104-4039

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Brier, WA 98036-8321

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Kirkland, WA 98033-6189

🕮 **City of Lake Forest Park**
Planning & Community Development
17425 Ballinger Way Northeast
Lake Forest Park, WA 98155-5556

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🕮 **Saint Edward State Park**
Attn: Joel Pillar, Park Ranger
14445 Juanita Drive NE
Kenmore, WA 98028-4905

✉ **Washington State Department of Fish & Wildlife**
Attn: Eric Pentico
16018 Mill Creek Boulevard
Mill Creek, WA 98012-1541

🕮 **Washington State Parks and Recreation Commission**
Attn: Brigid Dean
WCC Environmental Specialist
Stewardship Service Center
PO Box 42650
Olympia, WA 98504-2650

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Olympia, WA 98504-7001

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Planning Review Team Manager
State of Washington Department of
Community, Trade and Economic
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Olympia, WA 98504-8350

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Olympia, WA 98504-0917

✉ **Harriett Beale**
Puget Sound Water Quality Action Team
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Olympia, WA 98504-0900

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Washington State Parks and Recreation
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Olympia, WA 98504-5848

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Olympia, WA 98504-5848

✉ **Steve Penland**
Washington State Department of Fish
and Wildlife
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Olympia, WA 98504-7600

🕮 **Barbara Ritchie**
Washington Department of Ecology
SEPA/GMA Coordinator
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Olympia, WA 98504-7600

✉ **Anne Sharar**
Washington State Department of
Natural Resources
SEPA Center
P.O. Box 47015
Olympia, WA 98504-7015

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P.O. Box 47300
Olympia, WA 98504-7370

✉ **Nancy Winters**
Washington Department of Corrections
P.O. Box 41112
Olympia, WA 98504-1112

FEDERAL AGENCIES

✉ **Federal Emergency Management Agency**
130 228th Street Southwest
Bothell, WA 98032-8627

✉ **U. S. Army Corps of Engineers**
Attn: Regulatory Branch
P.O. Box 3755
Seattle, WA 98124-3755

✉ **U. S. Postal Service**
Attn: Michael D. Martens
10500 Beardslee Boulevard
Bothell, WA 98011-3214

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Fire and Emergency Medical Services
Attn: Denny Wright, Fire Marshal
9654 NE 182nd Street
Bothell, WA 98011-3332

🕮 **King County Fire Protection District #16**
Attn: Tom Weathers
18030 73rd Avenue NE
Kenmore, WA 98028-2752

🕮 **Northshore Utility District**
Attn: Dave Kaiser, Engineering Director
8630 NE 185th Street
Kenmore, WA 98028-2684

🕮 **Puget Sound Energy**
Municipal Construction Planning Department
Attn: Casey Olson
P.O. Box 90865
Bellevue, WA 98009-0868

🕮 **Verizon Telecommunications**
2301 C West Casino Road
Everett, WA 98204-1439

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39015 172nd Avenue SE
Auburn, WA 98092-9763

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Don & Helen Johnson
6178 NE 189th Place
Kenmore, WA 98028

🕮 **Kenmore Little League**
J. W. Smith
14423 75th Avenue NE
Kenmore, WA 98028

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🕮 **Bothell Public Library**
18215 98th Avenue NE
Bothell, WA 98011-3336

🕮 **Brier Public Library**
23303 Brier Road
Brier, WA 98036-8247

🕮 **Kenmore Public Library**
18138 73rd NE
Kenmore, WA 98028-2703

🕮 **King County Library System**
Kirkland Branch
308 Kirkland Avenue
Kirkland, WA 98033-6221

🕮 **King County Library System**
Lake Forest Park Branch
17171 Bothell Way NE
Lake Forest Park, WA 98155

PROPERTY OWNER

🕮 **Catholic Archdiocese of Seattle**
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910 Marion Street
Seattle, WA 98104-1299

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Kenmore, WA 98028

🕮 Anthony Cree
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Lynnwood, WA 98037

✉ Tom Cobian, LMP, CWT
Inner Waves
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Bothell, WA 98011

✉ Mark Brumbaugh
18225 64th Avenue NE
Kenmore, WA 98028

🕮 Jeannie Dines
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Kenmore, WA 98028

✉ Mark Eaton
6520 NE 188th Street
Kenmore, WA 98028

🕮 Tom Fitzpatrick
6476 NE 153rd Street
Kenmore, WA 98028

✉ Thomas F. Haensly
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Edmonds, WA 98020-4121

✉ John Hendrickson
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Kenmore, WA 98028

✉ Bob Hensel
19301 65th Place NE
Kenmore, WA 98028

✉ Bert Hubka
16911 75th Avenue NE
Kenmore, WA 98028

ADJACENT PROPERTY OWNERS WITHIN 500 FEET

✉ Property Owners Adjacent Bastyr University
11020 26th Avenue SE
Everett, WA 98208

✉ Property Owners Adjacent Bastyr University
11420 Pinehurst Way NE
Seattle, WA 98125

✉ Property Owners Adjacent Bastyr University
12903 74th Avenue NE
Kirkland, WA 89034

✉ Property Owners Adjacent Bastyr University
1332 192nd Street SE, #81
Bothell, WA 98012

✉ Property Owners Adjacent Bastyr University
13614 94th Avenue NE
Kirkland, WA 98034

✉ Property Owners Adjacent Bastyr University
14124 74th Place NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14124 74th Place NE, #18
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14128 74th Place NE, #A17
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14128 74th Place NE, #B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14128 74th Place NE, #D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14129 51st Drive NE
Marysville, WA 98271

✉ Property Owners Adjacent Bastyr University
14132 74th Place NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
16214 Eastshore Drive
Lynnwood, WA 98037

✉ Property Owners Adjacent Bastyr University
17358 149th Street SE
Monroe, WA 98272

✉ Property Owners Adjacent Bastyr University
17458 149th Street SE
Monroe, WA 98272

✉ Property Owners Adjacent Bastyr University
18727 56th Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
19037 37th Avenue NE
Seattle, WA 98155

✉ Property Owners Adjacent Bastyr University
208 Mountain Park Boulevard SW, #E104
Issaquah, WA 98027

✉ Property Owners Adjacent Bastyr University
2323 West Mesquite Avenue
Desert Hills, AZ 85086

✉ Property Owners Adjacent Bastyr University
2834 Aquarius Avenue
Silver Spring, MD 20906

✉ Property Owners Adjacent Bastyr University
3322 N C 185th
Seattle, WA 98155

✉ Property Owners Adjacent Bastyr University
421 Houston Oaks Drive
Savannah, GA 31419

✉ Property Owners Adjacent Bastyr University
4560 West Cramer Street
Seattle, WA 98199

✉ Property Owners Adjacent Bastyr University
5224 Elizabeth Loop SE
Auburn, WA 98003

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners Adjacent Bastyr University
14132 74th Place NE, #16C
Bothell, WA 98011

✉ Property Owners adjacent Bastyr University
14132 74th Place NE, #A16
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14132 74th Place NE, #B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14136 74th Place NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14136 74th Place NE, #A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14136 74th Place NE, #B15
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14140 74th Place NE, #14A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14140 74th Place NE, #14B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14140 74th Place NE, #14D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14140 74th Place NE, #C
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14144 74th Place NE, 13A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14144 74th Place NE, 13D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
5325 113th Place NE, #17
Kirkland, WA 98033

✉ Property Owners Adjacent Bastyr University
6803 NE 149th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7020 NE 148th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7021 NE 148th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7024 NE 155th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7030 NE 147th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7036 NE 147th Street
Kenmore, WAZ 98028

✉ Property Owners Adjacent Bastyr University
7052 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7053 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7054 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7059 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7060 NE 145th Street
Kenmore, WA 98028

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners Adjacent Bastyr University
14148 74th Place NE, #12
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14148 74th Place NE, #A12
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14152 74th Place NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14152 74th Place NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14152 74th Place NE, #A11
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14158 74th Place NE, #B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14160 74th Place NE, #9B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14160 74th Place NE, #9D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14160 74th Place NE, #A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14160 74th Place NE, #C9
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
1419 222nd Place NE
Sammamish, WA 98074

✉ Property Owners Adjacent Bastyr University
14151 73rd Avenue NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7068 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7069 NE 145th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7133 NE 147th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7303 NE 143rd Street
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7304 NE 142nd Place, #A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7304 NE 142nd, #C1
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7304 NE 143rd Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7305 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7310 NE 142nd Place, #A2
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7310 NE 142nd Place, #D2
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7310 NE 142nd Place, #B2
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7311 NE 143rd Street
Bothell, WA 98011

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners adjacent Bastyr University
14251 73rd Avenue NE
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, #201
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Ave. NE, #404
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, #A301
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, #A303
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, A101
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Ave. NE, A103
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, A104
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, A202
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14251 73rd Avenue NE, A302
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14253 73rd Avenue NE., B101
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14253 73rd Avenue NE, B102
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7312 NE 143rd Street
Kenmore WA 98028

✉ Property Owners Adjacent Bastyr University
7313 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7315 West Greenlake Drive North
Seattle, WA 98103

✉ Property Owners Adjacent Bastyr University
7316 NE 142nd Place, #C
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7318 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7319 NE 143rd Street
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7322 NE 142nd Place, #D4
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7322 NE 142nd Place, #A
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7322 NE 142nd Place, #C
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7322 NE 143rd Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7326 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7327 NE 143rd Street
Bothell, WA 98011

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners Adjacent Bastyr University
14253 73rd Avenue NE, B201
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14253 73rd Avenue NE, B301
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
14307 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14323 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14329 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14337 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14504 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14512 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14520 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14528 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14530 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14536 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7328 NE 142nd Place, #5D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7328 NE 142nd Place, #A5
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7328 NE 142nd Place, #B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7328 NE 142nd Place, #C5
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7329 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7330 NE 143rd Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7334 NE 142nd Place, #B6
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7334 NE 142nd Place, #D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7334 NE 145th Place
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7335 NE 143rd Street
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7340 NE 142nd Place, #B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7340 NE 142nd Place, #A
Bothell, WA 98011

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners Adjacent Bastyr University
14538 73rd Avenue NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14615 72nd Place NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14630 Juanita Drive NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14634 Juanita Drive NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14644 Juanita Drive NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14656 Juanita Drive NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14703 70th Court NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14707 72nd Place NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14711 70th Court NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14712 70th Court NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14719 70th Court NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
14720 70th Court NE
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
7346 NE 142nd Place, #8B
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7346 NE 142nd Place, #D
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
7405 NE 146th Street
Kenmore, WA 98028

✉ Property Owners Adjacent Bastyr University
8346 NE 142nd Place, #8C
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
8514 NE 135th Street
Kirkland, WA 98034

✉ Property Owners Adjacent Bastyr University
8539 East Vernon Avenue
Scottsdale, AZ 85257

✉ Property Owners Adjacent Bastyr University
9010 NE 142nd Court
Bothell, WA 98011

✉ Property Owners Adjacent Bastyr University
925 East Meadow Drive
Palo Alto, CA 94303

✉ Property Owners Adjacent Bastyr University
9505 119th Street SW
Lakewood, WA 98498

✉ Property Owners Adjacent Bastyr University
960 Newport Way NW
Issaquah, WA 98027

✉ Property Owners Adjacent Bastyr University
PO Box 1238
Bothell, WA 98041

✉ Property Owners Adjacent Bastyr University
PO Box 2854
Renton, WA 98056

Adjacent Property Owners within 500 Feet, *continued*

✉ Property Owners Adjacent Bastyr University
15817 71st Avenue NE
Kenmore, WA 98028