April 10, 2020

City of North Bend Community and Economic Development
PO Box 896
North Bend
WA 98045

Attn: Jamie Burrell, Community & Economic Development Department

SUBJECT: City of North Bend Water System Plan, State Environmental Policy Act (SEPA) Determination of Nonsignificance (DNS)

Dear Ms. Burell:

The following are comments from the Friends of the Snoqualmie Valley Trail and River. The mission of Friends is to preserve and protect the quantity and quality of the water that flows in the Snoqualmie River and the surrounding natural resources. As stated in the North Bend Comprehensive Plan, "The contamination or reduction of these resources where people reside and work, damages the very reasons that people choose to live here." Friends has organized itself around this goal. As such, we are strenuously objecting to the Determination of Nonsignificance (DNS) by the City of North Bend with regards to the North Bend Water System Plan (Grey and Osborne, March 2020).

Under the State Environmental Policy Act (SEPA) non-project actions, e.g. this Water System Plan (WSP), are required to be reviewed for their likely impacts to the environment, as the plans contain proposed future on-the-ground projects. Quoting from the Department of Ecology’s SEPA guidelines “reviewing the plans provides an opportunity to:

* Affect many future projects
* Address cumulative impacts
* Identify possible mitigation for future projects to reduce or eliminate environmental impacts
* Ensure an adequate alternatives analysis meeting the objectives of the proposal is completed

Since a nonproject action will regulate future activities, it is important to consider the types of allowable projects and their likely impacts. Identifying concerns or possible mitigation measures at the nonproject stage allows them to be considered before a policy, plan, or regulation is adopted.”

Further emphasis from SEPA guidance: “Plans and the implementing regulations are likely to have a much more widespread influence, as they may affect the permitting, approval, or denial of unknown numbers of future project proposals or permit renewals…Many of these issues cannot be reconsidered or appealed during later project review.”

The SEPA Environmental Checklist submitted by the City of North Bend repeatedly states that the environmental impacts of the numerous projects proposed in the WSP “will be determined on a project specific basis”. As stated in the above paragraphs, SEPA guidance clearly calls out the need to assess the environmental impacts of the various project options and combinations of options from a cumulative perspective. It is a critical to look at the overall impact of proposed projects and options for implementation. An Environmental Impact Statement (EIS) is required to do this.

The WSP lists 20 capital projects (Table 7-2) proposed to be accomplished in the next 10 years. However many more potential projects are described in the plan than presented in the table. For example, there are 5 projects described for mitigation and only 3 in the plan for the next 10 years. No explanation is provided as to the reason for priority or timing of proposed mitigation projects. An EIS is needed to look at the reasoning for project selection and overall impacts of multiple projects. Have other options been considered? What is the basis for the selected options? This needs to be outlined and reasoning shared with the affected public.

**General Mitigation Need**

A very critical aspect to the planning is the need for additional mitigation for the use of the Centennial Well. As stated in the executive summary of the WSP:

“Mitigation capacity dictates how much water can be withdrawn from the Centennial Well. Unfortunately, during the dry summer months high overall water demand coincides with a severely limited withdrawal capacity from Mount Si Springs. As a result, the City must depend on the Centennial Well for the majority of its water production. This often coincides with low instream flows in the Snoqualmie River which leads to increased mitigation requirements. Under present peak summer demand, if a drier summer were to occur, the flows at Hobo Springs would be at or just below those required to properly mitigate water demand. The City must therefore increase its mitigation capacity by implementing two measures. 1. Enact water conservation policies that curb peak season water use… [and] 2. Obtain additional sources of mitigation water…”

As quoted above, the WSP clearly states that there is an immediate need for additional mitigation for Centennial Well. To put it succinctly, if there is a dry year, the City does not have adequate mitigation for the needed water supply. This puts both the citizens of the area and the Snoqualmie River at risk. This risk needs to be clearly defined and how the current lack of adequate mitigated water for the City of North Bend will be handled if there is a dry year before new mitigation source(s) are put on line. Routine water conservation may not be enough to supply adequate mitigation relief. How will this be handled?

**SEPA Checklist Environmental Elements**

The proposed projects to supply additional mitigation needs and the amount of growth this can support need to be carefully evaluated. An EIS that looks at the overall options and cumulative effects of proposed projects is critical. The current Water System Plan answers none of these questions. Some examples of the significant environmental considerations are listed below.

***Earth***According to Figure 1-2, an additional parcel of land previously within the Sallal Water Association's (SWA) Water Supply Area (WSA) has been added to the City of North Bend's Retail WSA.  This parcel of land is proposed to be developed by Cedar River Partners (representing 216 water certificates). No discussion as to the justification or environmental implications of increasing the North Bend Retail Water Service Area is provided in the WSP.  It is our understanding that this parcel of land is not legally within the North Bend WSA nor within the SWA WSA, and this property must provide its own WSP as stipulated by the Department of Health.  Adding this parcel of land clearly adds additional needs for mitigation and, as the WSP points out, mitigation is already inadequate, so not only the legal basis, but  the environmental risks that this proposed addition presents needs to be assessed in an Environmental Impact Statement.

In addition several of the listed mitigation projects involve significant earth related activities, e.g. the Golf Course Mitigation and the Mitigation Reservoir.

***Surface Water***

All proposed mitigation projects include significant effects on surface water from both a quality and quantity aspect. A major consideration for the health of the river is temperature effects as the City’s wastewater treatment plant already has major challenges for temperature reduction.

***Groundwater***

Section 3b of the SEPA checklist asks if groundwater will be drawn from a well and for specifics related to that withdrawal.  The response in the WSP is that “this will be determined on a project specific basis.” This response is inappropriate since it is a given that multiple well sources are part of the WSP including Sallal Water Association’s wells, even without new projects.  There needs to be a detailed discussion of the groundwater sources and its use.

Another critical aspect is the continuity of the groundwater with the Snoqualmie River. What would be the result of using Sallal well water for “mitigation” of the river, when the Sallal wells are in the same drainage system as the Centennial Well which requires the mitigation?

***Animals***

Bull Trout is listed as the only threatened fish.  In fact, of greater importance are the threatened Steelhead Trout and Chinook Salmon.  All three species are really an issue only below the Falls but the water flow of the three forks above the Falls makes up a majority of that flow. Chinook and Steelhead have residency times in the river from April through Nov.  The 2010 DOE Total Maximum Daily Load (TMDL) report cites three locations already classified as Category 5 (worst category) and 38 additional impaired areas that should be Category 5.  This is mostly related to water temperature which is very much a function of instream flow, and which also could be exacerbated by use of ponds or reservoirs for mitigation.

The above items are only selected examples of the critical nature that the mitigation needs of the Snoqualmie River be properly met. The 14-day comment period to review the 800+ page WSP precludes exhaustive analysis of the potential environmental concerns. It can be definitely stated though that the City of North Bend WSP includes many projects that will have significant consequences to the health of the Snoqualmie River and the reliability of the water supply for the residents of the City. An Environmental Impact Statement is needed to assess these consequences and to clearly delineate the most advantageous plan for both the City residents and the environment.

Sincerely,

Jean Buckner

Jean Buckner
President, Friends of the Snoqualmie Trail and River

CC:
Ria Berns, Washington State Dept. of Ecology
David Miller, City of North Bend CED Director
Richard Rodriquez, Washington State Department of Health
Jae Hill, UTRC Chair
Anne Savery, The Tulalip Tribe
Matt Baerwalde, The Snoqualmie Tribe
Tom McDonald, Cascadia Law Group