



**Snohomish County
Planning and Development Services**

Dave Somers
County Executive

Barb Mock, Director
3000 Rockefeller Avenue M/S #604
Everett, WA 98201-4046
(425) 388-3311 FAX (425) 388-3832

REVIEW COMPLETION LETTER

DATE OF LETTER: Apr 27, 2018

PROJECT FILE NO: 18 100915 SHOR

PROJECT NAME: N Seattle Lateral Upgrade Project

COMPLETE APPLICATION DATE: Jan 25, 2018

APPLICANT:

Toby Schwalbe - Williams/Northwest Pipeline LLC
295 CHIPETA WAY
SALT LAKE CITY, UT 84108

CONTACT:

Toby Schwalbe - Williams/Northwest Pipeline LLC
295 CHIPETA WAY
SALT LAKE CITY, UT 84108

PROJECT DESCRIPTION:

Removing 5.85 miles of existing 8 inch pipeline and replacing it with 20 inch pipeline.

Dear Toby Schwalbe - Williams/Northwest Pipeline LLC:

The information listed below is required to evaluate your proposal further. Please respond to all of the comments.

Drainage/Grading/Geohazard:

Reviewer: Randolph Sleight

1. Provide a site stability analysis for all sloped areas greater than 33% and assess whether or not such slopes meet the definition of a landslide hazard area (LHA) as described in County Code SCC 30.91L and 30.62 B. If portions of the development activity is within the area that is determined to be a landslide hazard area by a licensed professional engineer or licensed professional with expertise in the geotechnical or geologic fields then the following must be provided to the County. A completed covenant and a stability analysis to assure that the slope is stable to 1.1 FS during a seismic event pursuant to the IBC and FERC requirements and 1.5 FS during a static condition. A written deviation request is also needed once the above is provided to show that going through the LHA could not be avoided. Mitigation of the hazard may be necessary as recommended by the licensed professional to maintain pipeline integrity within the easement area and within the LHA.

The following link can lead one to the current drainage and grading requirements for the land disturbing activity permit and stormwater pollution prevention plan requirements for the project.
<https://snohomishcountywa.gov/1489/NPDES-Permit-Reissue-Project>

2. At the land disturbing development permit stage provide the necessary details of where dewatering will occur and quantify the amount of dewatering that is anticipated as well as the pump sizing and pipe sizing for the contractor to use. The land disturbing activity permit is required pursuant to 30.63 B due to the work in the critical areas and the total volume of earth being moved or graded on the project. Quantities of cut and fill shall be reflected on the grading plans. Finish contours shall be shown in areas where grades are being modified on the sites.
3. Staging areas for materials placement shall be shown if ground disturbance is anticipated
4. The project will be required to prepare a full drainage plan to meet minimum requirements 1 through 9 due to its size and the amount of new hard surfaces being created at the new launcher/receiver pit site and possibly at the Fritch mill site. Modeling of the drainage shall be done using WWHM or an equivalent stormwater model to size the flow control and treatment facilities. Use the current EDDS and Snohomish County Drainage Manual dated January 2016 for the drainage design to meet the drainage code 30.63A SCC.

Critical Areas (Streams/Wetlands/Fish & Wildlife)/State Shorelines:
--

Reviewer: Randy Middaugh, Principal Planner

1. You indicate that only those critical areas that were within 100 feet of the centerline of the replacement alignment were identified. Section 30.62A.130(1)(f) SCC requires the location and description of all wetlands and fish and wildlife habitat conservation areas located on the site or within 300 feet or the width of the widest potential buffer of the site boundaries. "Site" is defined as all lands within 200 feet of site disturbance or the property or easement boundary, which comes first.
2. Are there any existing private Critical Area Site Plans (CASPs) in the pipeline easement or other properties where development activities will be occurring? If so, they need to be altered to reflect the utility easement restrictions/limitations. You can find the CASPs at the following link:
<http://gismaps.snoco.org/Html5Viewer/Index.html?viewer=pdsmapportal>
3. Defining impacts to shrub-scrub wetlands or buffers as "temporary" doesn't sound realistic (appendix F, Section 2.2 – pg. 4). Snohomish County Code defines "temporary" impacts are those that can be restored to pre-disturbance conditions in one growing season (see 30.62A.320(3)(d)). If the impacts aren't temporary you need to apply the mitigation ratios in Table 3 of Section 30.62A.320(3).
4. There is no discussion regarding State Sensitive species. The following State Sensitive species are listed in Snohomish County Code.
 - (a) Larch mountain salamander;
 - (b) Common loon;
 - (c) Peregrine falcon;
 - (d) Olympic mudminnow;

- (e) Pygmy whitefish;
- (f) Gray whale;
- (g) Bald eagle; and
- (h) Margined sculpin.

5. You need to provide a more detailed discussion and analysis of buffer impacts and mitigation. There may be additional impacts once you identify critical areas within 300 feet of the site. The requirements are in Section 30.62A.320 SCC.
6. Other than using Innovative Development Design (30.62A.350 SCC) for the stream boring deviation, what else are you requesting a deviation from using IDD?
7. Will there be critical areas or buffers that will be permanently converted from one vegetation cover type to another, e.g., FO to SS or EM, or SS to EM? If so, what is the mitigation?
8. SEPA checklist incorrectly defines "primary association areas" (see page 18).
9. SEPA checklist incorrectly includes state candidate species as "critical species" under Snohomish County Code – (see pages 18-19).
10. Other than the request to use IDD for a deviation from the boring requirement, are the stream crossing complying with the other stream crossing requirements of 30.62A.330(2)(c)? Provide analysis of compliance with this section.
11. Will any of the TEWAs be in stream or wetland buffers? And if so, is there any mitigation proposed?
12. Do the proposed wetland and waterbody revegetation procedures as outlined in the ECRP comply with Snohomish County mitigation requirements?

Right-of-Way:

Reviewer: Randolph Sleight

1. For all crossings within the County right of way please contact Annie Artack at 425-262-2921 in the PDS Right of Way group for the necessary right of way use and utility permits for each crossing. A separate plan/permit will be necessary if a driveway access point is being modified or relocated to an existing County right of way.
2. Department of Public Works (DPW) will need to review the locations where and how abandonment of pipelines will occur and if that would be allowed to keep the abandoned pipes in place and properly decommissioned.
Normally, any utility pipeline would be removed if the pipe currently lies within an arterial.
Please identify the specific locations where pipes are intended to be abandoned for DPW review.

Building/Structural:

Reviewer: Randolph Sleight

1. A building permit is required for all walls greater than 4 feet in height that are proposed at the launcher/receiver pit.
2. Temporary shoring plans may be necessary for any bore pits if those are constructed under County jurisdiction, none were shown/detailed at this stage of development at this time.

Flood Hazard:

For the development occurring at the pumping/regulator station a flood hazard permit will be required.

Noise Control:

Provide analysis of compliance with the Noise Control provisions of Chapter 10.01 SCC. If you wish request a Public Disturbance Exemption Permit for any night-time noise restrictions, see Section 30.01.050 for the requirements.

RESUBMITTAL OF REQUESTED ITEMS

Please contact the PDS Project Manager, (Randy Middaugh), to arrange for submittal of the requested information. The resubmittal package must address all changes in order to be accepted.

Please be sure to provide the following number of copies:

- | | |
|------------------------|-----|
| Reports | () |
| Site Plans | () |
| Grading/Drainage Plans | () |

Review of your application will continue upon the receipt of the required information. At the conclusion of that review, you will be notified if the project is ready for a SEPA threshold determination.

Sincerely,

Randy Middaugh | *Principal Planner*
[Snohomish County Planning and Development Services](#)
 3000 Rockefeller Ave M/S 604, Everett, Wa. 98201
 425-262-2306 | Randy.Middaugh@snoco.org