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TECHNICAL MEMORANDUM

Date:	November 4, 2009
To:	Steve Pilcher
From:	Susan Graham
Subject:	Lawson MPD EIS - School Site Clarification
cc:	
Project Number:	217-3043-003
Project Name:	Lawson Hills MPD EIS

The purpose of this memorandum is to clarify sections of the Lawson Hills Draft EIS pertaining to the siting of the elementary school parcel. The Draft EIS assesses four alternatives for development of the Lawson Hills area: no action, the applicant's proposal (referred to as Alternative 2), a mitigated MPD, and a fiscally balanced MPD. Alternatives 2, 3, and 4 would be developed as Master Planned Developments, subject to the requirements of the City's MPD Ordinance (BDMC 18.98). Under all of the alternatives, the proposed land use plans include residential, commercial/office, open space, and school uses. Development of these uses is subject to City development code, including the Sensitive Areas Ordinance, which defines sensitive environmental areas and establishes buffers and other conditions.

Chapter 4, ***The Natural Environment – Effects on Ecosystems and the Natural Environment***, needs clarification and correction in regards to impacts related to "Earth, Geology, Topography, and Soils." In several locations within the discussion of erosion, seismic, and mine hazards (as defined by the City's SAO), potential impacts related to the location of the school site should be corrected as follows. These corrections will be reflected in Chapter 4 of the Final EIS, as well as in summary sections regarding impacts of Alternatives 2 and 3.

As currently depicted, the applicant's proposal (Alternative 2) indicates a 10-acre site east of Lawson Street for a proposed elementary school. Alternative 3 also identifies a school in this area, however, the recommendation is for a 15-acre site (this is at the high end of the Enumclaw School District's recommendation for an elementary school site of 10-15 acres). In both alternatives, the school use is indicated on a parcel that *overlaps potential mine hazard and erosion hazard areas*. The clarification needs to be made that while the *parcel* may overlap these sensitive areas, the school building *site* would not. School facility development on this site would occur in accordance with City development standards; no current codes would prohibit construction at this site.

The Draft EIS also states that the school site is located in an area of thick fill within the reclaimed McKay Section 12 Surface Coal Mine. However, the school site does not overlap the thick fill (see attached map correction provided by Golder Associates, dated September 21, 2009), and therefore is not located within a seismic hazard area as defined by the SAO.

In summary, with regards to the "Earth" element of the Natural Environment, both Alternatives 2 and 3 indicate a school use on a parcel that overlaps potential erosion and mine hazard areas; the parcel is not located in a seismic hazard. Therefore, school facilities can be located on this site, and must be developed in accordance with the City's development code and SAO. Geotechnical analysis of the area conducted by Golder Associates, AESI, and reviewed by Icicle Creek Engineers in an independent peer review, did not indicate severe hazards in this area. The Draft EIS incorrectly interpreted mapping data to draw the conclusions presented in the Draft document. The Final EIS will reflect these clarifications and corrections.