

SECTION IV

KEY ISSUES

The DEIS was issued July 1, 2003 for a 45-day public comment period. During this timeframe, a DEIS public meeting was held to provide an opportunity for the presentation of verbal comments – in addition to the submittal of written comments. A number of comments (written and verbal) were received that identified common issues; these we have termed “key issues.” Rather than providing a similar response to each comment that raises a key issue, this section of the FEIS identifies the key issue and provides discussion. Responses to specific key issue comments in *Section V* and *VI* of this FEIS refer back to the discussion that is contained in this section.

The following key issues are discussed in this section of the FEIS:

1. Transportation, Circulation and Parking;
2. Enrollment Cap for the College;
3. EIS Alternatives;
4. EIS Process and Notification
5. Noise; and
6. Community Involvement.

1. Transportation, Circulation and Parking

A substantial number of written comments and public testimony identified issues related to the scope of the traffic analysis that was contained in the DEIS and subsequent conclusions associated with that analysis. In summary, the comments noted concern with regard to:

- proposed roadway mitigation scenario and desire to have a traffic signal installed;
- technical traffic and parking-related concerns involving questions relative to traffic volumes and intersection analyses;
- parking off-campus by students;
- re-opening the entrance to campus from Innis Arden Way;
- increased traffic volumes on 6th Avenue NW/Innis Arden Way/Greenwood Avenue;
- current traffic congestion at the intersections of 6th Avenue/Innis Arden Way and Innis Arden Way/Greenwood Avenue;
- desire to have more comprehensive morning peak traffic period analysis; and
- pedestrian safety, particularly as it applies to Innis Arden Way.

In order to effectively respond to the traffic, circulation and parking issues, Shoreline Community College determined that the *Transportation, Circulation and Parking* section of the DEIS should be completely revised and expanded in scope. In addition, the College initiated a process of working closely with community members and representatives of the City of Shoreline by establishing an Access Working Group (AWG) within the College's Community Task Force. The AWG examined issues and alternatives for the problematic intersections at Innis Arden

Way/ Greenwood Avenue N and N 160th Street/ Greenwood Avenue North and the AWG assisted in developing a new expanded scope of work for this section of the FEIS.

The revised *Transportation, Circulation and Parking* analysis is contained in its entirety in *Section III* of this FEIS.

2. Enrollment Cap for Shoreline Community College

A number of people submitted comments concerning the need for a possible enrollment cap or the need to expand class offerings through satellite facilities or the Internet.

As noted in *Section II* of the DEIS and this FEIS, Shoreline Community College is an accredited institution of higher education and part of Washington State's community college system, which includes 34 colleges. The State Community College Act of 1967 established college districts apart from public schools with a mandate to provide "an open door to education" for all who seek it. Funding is provided by the Legislature through the biennial budgetary process. The Legislature through the Higher Education Coordinating Board establishes enrollment levels based on annualized full-time equivalent¹ (FTE) students.

An enrollment cap at SCC is not a possibility in that limiting enrollment at this institution would place significantly higher demands at other community colleges. Enrollment increases have been occurring as a result of

- an increased number of people needing increased job skills;
- the baby boom echo; and the
- need for worker retraining.

3. Alternatives

A number of written comments and public testimony identified issues relative to the alternatives that were evaluated in the DEIS; specifically, the comments suggested

- considering use of off-site facilities for additional classrooms, such as the Sears/Blue Cross buildings; and
- identifying alternatives to the proposed parking garage, in the event that funding is unavailable.

The SEPA Guidelines provide direction relative to what alternatives should be discussed in an EIS,² specifically:

- The EIS must evaluate the proposal, the no-action alternative and other "reasonable alternatives."
- "Reasonable alternatives" are actions that could "feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation."

¹ A full-time accredited student is one that carries a 15-hour credit load per quarter.

² WAC 197-11-440 (5)

Section II D. of the DEIS and this FEIS identify the goals of the Master Plan,³ as well as physical planning objectives relative to buildings and infrastructure, open spaces, athletic facilities, and circulation and parking. In addition to the *No Action Alternative*, the DEIS and this FEIS include analysis associated with the *Preferred Alternative*, an *Expanded Design Alternative* (DEIS *Proposed Action*), and a *Modified Design Alternative*. It has been determined that no other project alternatives would meet the proposal's objectives at lower environmental cost.

As noted in Section II of the DEIS and this FEIS, SCC already provides program offerings in leased space at Lake Forest Park in the Lake Forest Towne Centre. Depending upon program acceptance, the College intends to continue this arrangement. In addition, SCC has adjusted classroom hours to accommodate increased educational demand, resulting in more-intensive use of existing campus facilities.

The proposed parking structure that was identified in the DEIS as part of the *Proposed Action*, would not be developed as part of the *Preferred Alternative* described in this FEIS. Under the *Preferred Alternative*, SCC would provide additional parking on-campus beneath buildings where possible and where funding is available, SCC would also continue to provide parking in conjunction with an off-campus facility, and by modifying parking demand through transportation management programs (e.g., preferential carpool parking, RPZ's, transportation/parking fees, etc.), as noted in detail in Section III of this FEIS.

4. EIS Process and Notification

A number of written comments and public testimony identified issues relative to the EIS process, in general, and notification. Specifically, the comments indicated that

- the comment period was not long enough;
- there should be no comment period during the summer when people are vacationing; and
- there was no notification of publication of the DEIS or of the DEIS public meeting.

Unlike the EIS scoping process that does provide an opportunity for an expanded scoping period – beyond the more-formal 21-day timeframe, no such provision exists for the DEIS comment period. As noted in the SEPA regulations,⁴ the DEIS comment period is 30 days from the date of issuance of the DEIS. Lead agencies (in this instance, Shoreline Community College) are authorized to extend the comment period by an additional 15 days. At the outset, SCC decided to provide agencies, organizations and the public the maximum amount of time to review and comment on the DEIS, hence the 45-day public comment period (July 1, 2003 through August 14, 2003). In addition, the College decided to hold a public meeting during the DEIS comment period – to provide agencies, organizations and the public with an additional opportunity⁵ to learn about the then-proposed *Campus Master Plan* and for agencies, organizations and the public to present verbal comments concerning the DEIS and the then-proposed *Campus Master Plan*. The public meeting occurred on July 29, 2003.

³ DEIS – *Campus Master Plan*; FEIS – *Concept Master Plan*

⁴ WAC 197-11-455 (6) (7)

⁵ in addition to the submittal of written comments

The SEPA regulations indicate that SEPA Lead Agencies (e.g., SCC) “must use reasonable methods to inform the public and other agencies that an environmental document is being prepared or is available and that public hearing(s), if any, will be held.”⁶ Examples of reasonable methods may include: posting the property, publishing notice in a newspaper of general circulation, notifying groups with known interest, notifying the news media, etc.

Copies of the DEIS were distributed to all members of Shoreline Community College’s Community Task Force, who represent a spectrum of the surrounding community; 41 public agencies; the Shoreline Chamber of Commerce; local libraries; and four newspapers (Daily Journal of Commerce, Seattle Times, Seattle Post Intelligencer, and the Shoreline Enterprise). Notice of the availability of the DEIS was officially published in July 2003. Notices of the availability of the DEIS were posted on-campus and were mailed to residents living within 500 feet of the boundary of the campus. In addition, all meetings of the Community Task Force and the Access Working Group (AWG) were open public meetings.

As discussed in *Section III* of this FEIS, the AWG was instrumental in framing the revised Transportation and Parking analysis (included in *Section III* of this FEIS) with a recognition that the updated Transportation and Parking analysis would become part of the FEIS. For dates and attendees of various public meetings on master plan development see Table 44.

**Table 44
Master Plan Meetings**

Date of Meeting	Meeting Type	Approximate Number of Attendees
11/18/2002	Meeting with the City of Shoreline	12
01/08/2003	First Community Task Force Meeting	18
02/05/2003	Community Task Force/Scoping Meeting	15
03/05/2003	Community Task Force Meeting	15
04/23/2003	Community Task Force Meeting	13
07/15/2003	Public Hearing on the Campus Master Plan	113
12/09/2003	Final Community Task Force Meeting	18
02/12/2004	First Meeting of the Access Working Group	12
03/11/2004	Access Working Group Meeting	11
03/25/2004	Access Working Group Meeting	7
04/08/2004	Public Open House	38
05/13/2004	Access Working Group Meeting	11
06/24/2004	Public Open House	40
07/08/2004	Access Working Group – Final Meeting	13

⁶ WAC 197-11-510 (1)

5. Need for Additional Noise Analysis

A number of written comments and public testimony requested that detailed noise analyses be conducted relative to increased traffic volumes, the proposed amphitheatre, and the ball fields.

Noise was an environmental issue that was identified during the EIS scoping process and a qualitative analysis was provided as part of the DEIS (pg. 64 through 71). That analysis examined the character of existing noise sources proximate to the College, distances from SCC to adjacent occupied properties, and applicable City and State noise regulations. The analysis noted that construction noise would be the noise source that could be the most disruptive, due to the sound levels of equipment that would likely be used on-site in conjunction with building construction. No long-term noise-related impacts are anticipated. The noise analysis provided a qualitative discussion of possible noise levels based on distances between the noise source and receiving property. The analysis indicated that while construction-related noise would be noticeable, because of substantial distances, existing mature vegetation, terrain, etc. sound levels would be less than is typical for construction equipment.

The noise analysis noted that some exemptions exist from the noise standards. Noise from construction activity that occurs between 7 AM and 10 PM is exempt from the City's noise limitations. The analysis also indicated that traffic noise resulting from motor vehicles operating on public streets is exempt from State noise standards and the City's nuisance restrictions.

The noise analysis further noted that sounds generated by the amphitheater that was part of the then-proposed *Campus Master Plan Proposed Action* could, at times, be noticeable, but that sounds generated by that venue would, in part, be mitigated as a result of the substantial distance between the noise source and receiving property, the orientation of the venue (facing northeast toward the then-proposed soccer and baseball fields), and existing mature vegetation and the terrain between the venue and the nearest receiving properties. Sounds that could be generated by the amphitheater and/or the sports fields is no longer an issue in that these facilities are not part of the *Preferred Alternative* that is discussed in this FEIS (*Section II*).

The qualitative noise analysis in the DEIS is based upon the conceptual *Campus Master Plan*. Building locations and configurations at that point in the planning process – as well as now in the *Concept Master Plan* process – are only approximate. The *Concept Master Plan* does not authorize construction of any specific buildings. As noted in the *Fact Sheet* associated with the DEIS and this FEIS (pg. *i* and *ii*), subsequent approval would be required by the City of Shoreline for site-specific development that is proposed by SCC in support of the *Concept Master Plan*. Conceivably, if necessary, more-detailed noise analysis could be performed once specifics of a campus development project are known.⁷

6. Community Involvement

Several comments expressed concern that inadequate opportunity had been provided for community involvement. The community has had the opportunity to be involved as part of the College's master planning process since the start of the public process. At the outset, SCC and the City decided that a community task force (CTF) should be formed, representing a broad range of neighborhood, community and City interests. The role of the CTF has been to review

⁷ e.g., site location, building configuration, noise generating equipment associated with the building, the building's orientation and distance to nearby residences and park areas that could be affected, characteristics of intervening topography and vegetation between the noise source and the receptor, etc.

preliminary campus planning and environmental impact information provided by the College, the master plan consultant team and the EIS consultant team and provide meaningful comments. The CTF met four times prior to issuance of the DEIS; each of these meetings were held at SCC, each was an open public meeting, and each was advertised. In addition, because the CTF is predominantly made up of community representatives, it was felt that CTF members would actively communicate with their peers and organizations to ensure that SCC master planning-related information was broadly disseminated.

In January 2003, at the start of the environmental impact statement process, a 3-week EIS Scoping process was held. The purpose of Scoping is to provide agencies, organizations and individuals an opportunity to submit comments concerning alternatives to include in the DEIS and the range of environmental issues that need to be evaluated. To provide an additional opportunity for early involvement, a public meeting/open house was held in early February 2003. Notice of the College's intent to prepare an EIS, to commence EIS Scoping and to hold a public meeting/open house was mailed to a broad range of agencies, organizations and individuals. In addition, notice was posted on-campus and published in the Enterprise newspaper. Thirty-two people attended the EIS Scoping meeting. EIS Scoping comments were received from 36 agencies, organizations and individuals.

The DEIS was issued in July 2003 and a 45-day public comment period (maximum allowed) was provided. Copies of the DEIS were distributed to agencies (federal, State, regional, County, and City), organizations and individuals, libraries, utility providers, newspapers and members of the CTF for review and comment. Notice of the availability of the DEIS and an associated public meeting was mailed to a broad range of organizations and individuals, was posted at several locations on-campus, and was published in several newspapers. To provide an additional opportunity for involvement, a DEIS public meeting was held late July 2003. Written comment letters were received from 71 agencies, organizations and individuals and testimony at the DEIS public meeting was provided by 36 people. Each of the written comments, and responses to the comments raised, are contained in *Section V* of this FEIS. Similarly, each of the comments obtained through public testimony and responses to the comments raised are contained in *Section VI* of this FEIS.

As noted previously in this FEIS, following conclusion of the DEIS public comment period, Shoreline Community College decided to revise the transportation analysis that was contained in the DEIS and to encourage greater community involvement. The Access Working Group (AWG), a subcommittee of the CTF was formed to examine key traffic-related issues. The AWG met five times and held two open houses/community meetings. Each of the AWG meetings were held on-campus and each was an open public meeting.