SEPA Comments on the Proposal	Community Planning Response	SEPA Technical Response	Action based on Comment
Tribes & Public Agencies – No comments submitted			
Public Comments have been restated below from email submittals to King County Parks. The original emails are subject to public records disclosure rules and regulations, including personal information. The comments below include comments from residents, citizens and members of the public as well as Parties of Record who are property owners located within the prescribed distance adjacent to the site who received written notice via mailing as required by applicable code:	Not all comments were within the scope of the Phase 2 SEPA. These responses are offered for additional clarification about the project, the community's master plan, and/or the historical context:	These responses are offered by the applicant and/or its consultants to address specific SEPA-related comments and/or technical topics.	

The Phase 1 SEPA review is inaccurate pertaining to many key attributes of expected Phase 2 construction including the following: 1) Section B Environmental Elements – 4 Plants – b) What kind and amount of vegetation will be removed / altered. 2) Section B Environmental Elements – 5 Animals – a) Birds and Animals observed on or near site, c) Is this site part of migration route 3) Section B Environmental Elements – 7 Environmental health – b) Noise 4) Section B Environmental Elements –10 Aesthetics – b What views in immediate area would be altered or obstructed 5) Section B Environmental Elements –11 Light and Glare –a) What type of light / glare will proposal produce. Times of day, b) Could light or glare from finished product be safety hazard or interfere with views? 6) Section B Environmental Elements – 14 Transportation – c) Parking, d) street improvements, f) Traffic Since all of these elements of SEPA checklist require revision to accurately assess Phase 2 construction plans, (the comment writer) as a vested stakeholder and neighbor to construction site, provides <u>demand for SEPA revision and public review</u>. This public review should also allow for design element revisions to mitigate impacts of this development project within the environmentally sensitive Rock Creek Valley as designated by King County Critical Area Ordinance.	Phase 1 of the project only included the re-surfacing existing fields it did not include additional fields or infrastructure. No lights were added in Phase 1, because the existing fields already had lights. No parking was added in Phase 1 because the existing fields are already served by parking. The Phase 2 SEPA Checklist includes information about these topics as it relates to the scope of Phase 2.	Phase 1 SEPA Checklist and SEPA Action were provided as background environmental documents for Phase 2 SEPA review. Phase 1 & 2 are part of a phased SEPA review enabled by the respective provisions of RCW, WAC and KCC regulations. The adequacy of Phase 1 SEPA Review is not timely for review under the Phase 2 SEPA review, except for cumulative impacts. However, no cumulative impacts are specifically mentioned or suggested. Instead, the comment seeks Phase 1 to be re-reviewed, yet state and local procedural rules do not enable performing a second review of a standing (prior) SEPA Action taken. Accuracy (or lack thereof) of information in the record used during a SEPA review is not necessarily the cause for overturning or changing a SEPA review already made by a SEPA Responsible Official, based on relevant SEPA case law and WAC provisions. The impacts of Phase 1 information on the decisions made during the SEPA Review of Phase 2 are speculations by the comment writer and unknown based on the comment. The Responsible Official notes that the SEPA action for Phase 2 is not reliant on any noted item by the comment writer from Phase 1 as it pertains to Phase 2. The SEPA responsible Official has no new information from the comments as the asserted accuracy of Phase 1 information, or the specific applicability of the 6 noted items in Phase 1 with respect to Phase 2 review. Rock Creek has a designated 300 feet stream buffer required by King County code. However, the proposal's site improvements are not located within the stream buffer and do not impact the stream. (Confirmed by Laura Casey, KC Permitting staff expert) No wetlands or stream review was required based on pre-application conference review of all SEPA documents available to comment writer during the review period.	No change to proposal or to proposed SEPA Action.

In addition to the above, King County must be sensitive to damage caused during construction process and restore damaged areas at phase completion. This has been a continuing source of nuisance.		The comment does not identify any specific impacts, or harm suffered. King County is not aware of “damage caused during construction” so it’s unlikely that there is any need to “restore damaged areas”. The assumption is that the comment writer is referring to Phase 1 site project installed under Clearing & Grading Permit, although the reference is not specific as to site location or feature. “Public Nuisance” is a term defined in the King County Code Title 12. However, there has been no nuisance declaration by King County Parks or by King County Permitting agencies at the subject site. There is also no evidence of public nuisance at the existing site, based on information provided in the written comment, or by site visit. There are no open reported or pending action code enforcement action requests at the subject site.	No change to proposal or to proposed SEPA Action.

We are property owners in the Rock Creek Ranch subdivision in Ravensdale. We received communication from King County regarding park development for phase 2 of the Ravensdale Park. The current pre- application site plan has 2 full synthetic multi-purpose fields and a much larger parking lot accessed from Kent-Kangley Road than what was placed in "community vision" years ago. In addition, all accommodations for wildlife appear to have been removed. Pre- Application Plan if adopted, would more than triple current capacity of synthetic fields for Soccer (winter) and Baseball (summer) with operating hours from 8AM to 11pm. This will of course provide unintended consequences of traffic, pollution, crime, noise and light (night game). We are opposed this plan going foward without public reviews of impacts. We demand full visibility to processes, designs and impact mitigation.	Wildlife habitat preservation is addressed by King County-adopted Rock Creek Vision. Ravensdale Park is identified in that vision as the most appropriate location for active recreation. (See above for detailed description) Many organizations participated in the development and implementation of the Rock Creek Valley Conservation Plan. The Rock Creek Valley, whose footprint closely matches the 98051 zip code area for Ravensdale, Washington, is approximately 32 square miles in size. In 2003 when the Friends of Rock Creek Valley (FRCV) completed a parcel-by-parcel analysis of the Rock Creek Valley 72% of the Valley was forested (just a bit more than 15,300 acres). The goal of the Conservation Plan was to retain around 65% forest cover long term (just a little bit more than 13,300 acres). As of 2013 over 8,000 acres in the Rock Creek Valley have been protected through fee simple ownership and conservation easement. There are current efforts and negotiations for a conservation easement on an approximately ~900 acres of forest land. The parcels selected for fee simple ownership and conservation easements were selected based on environmental rankings. These rankings included points for quality wildlife habitat, wildlife corridor connectivity, and parcels that helped make up larger blocks of forest (1,000+ acres). When parcel-by-parcel analysis of the Rock Creek Valley was completed the Ravensdale Park site and the parcel acquired near the post office (the Community Meadow) failed to rank even as a moderately important parcel to protect for habitat. It failed to gain points as a urban/rural buffer, as an aquatic/riparian area, as part of a wildlife habitat block or corridor, or as part of a primary forest block. It was ranked high as an opportunity to provide an area for active recreation and ranked high for development risk (homes).	Comment writers are parties of record who are adjacent property owners acknowledging proper and timely written mailed notice of application, and their written invitation for submitting timely SEPA review comments. The Community Vision mentioned has no specific document cited, no date mentioned. If the document was a prior King County report for Ravensdale sub area plan, it was replaced by the Ravensdale Master Plan report prepared by Jones & Jones consultants recently for the subject site. The master plan for the site does show alignment with the Phase 2 proposal. Wildlife habitat was a consideration of the Master Plan, and also during the Phase 1 SEPA review in 2010 & 2011, and the Phase 2 SEPA review at issue. "Adoption of the plan" is not an accurate description of the proposed permitting action at issue in the SEPA review. A Type II Administrative permit decision will be made by King County Permitting staff. The size of the Phase 2 parking area was disclosed information during Phase 2 SEPA review for the paved area consisting of a new parking area plus an added area parking to Phase 1 existing parking lot. The overall size of the Phase 2 parking paving surface was depicted in the Ravensdale Master Plan report. No specific size was provided information in the planning report, so a detailed side-by-side comparison (based on measured paved surface quantity) can not be made with Phase 2 site plan. Regardless, the proposed parking is depicted in the Phase 2 site plan materials (attachments to the SEPA Notice and on SEPA Checklist) is consistent with the master plan report for shape, layout, site adjacency, general position with respect to existing roads and other existing features. Triple current capacity of synthetic fields for Soccer (winter) and Baseball (summer) with operating hours from 8AM to 11PM is asserted and speculative, but clearly a quantified impact. The unintended consequences of traffic, pollution, crime, noise and light (night games) are each asserted yet no specific locations (road name, etc.) and no specific impacts (travel time, travel speed, etc.) are quantified for each of the 5 items. Also, the 5 impacts are not qualitatively described for each of the 5 impacts listed in the comments. A traffic impact analysis (TIA) was prepared by applicant's qualified consultant as required by applicable regulations. Traffic impacts including access, paving related storm water runoff from parking were quantified in the TIA report by Popp & Associates, and traffic Traffic related indirect impacts (non-point source pollution, air quality, etc.) were properly considered. The probable impacts for water quality onsite were mitigated as part of the proposal. The offsite impacts were also considered for the access drive to the site located within public right of way. The stated crime impact is not specified for crime type (property, personal safety, etc.) or crime location (private or public lands). Generally, it is widely accepted (Source: NRPA, WRPA documents) that active recreation is actually a crime deterrent and a proven crime prevention method (Source: CPTED program principles, NRPA, WRPA and university research documents). The most probable impact to crime caused by the Phase 2 proposal will be positive impacts, not negative impacts. The SEPA Review process does not require any response for anticipated future positive impacts. Spill & glare control was anticipated as a possible adverse impact by the applicant's proposal. The applicant's proposal has included adequate mitigation for controlling light impacts to offsite properties from night games. As mitigated, the proposal will not create adverse night lighting impacts. State law and King County code regulates noise, including provisions for the allowable noise levels from sports events within allowed hours, including night games at recreation sites.	No change to proposal or to proposed SEPA Action.

As a homeowner in the Rock Creek Ranch Homeowners Association, the concerns are for the ball fields development taking place at the corner of Kent-Kangly Road and 268th Street, Ravensdale, adjacent to my neighborhood and house. Although not listed on the drawing provided, the two new ball fields are backed up against 268th street. My home street (SE 272nd Street) is a dead-end cul-de-sac directly across from the southern ball field. I would like to be assured that the environmental influence of "Light Pollution" has been considered and addressed. I realize that these ball fields will likely go in as a community improvement, however I hope that planning and budgetary considerations have been applied to the lighting specifications such that they have the latest innovations regarding Light pollution mitigation, such as: · Types of bulb technology. · Light mast and array placement considerations that will mitigate light pollution toward neighborhoods and the night sky. · Focusing technology. · Diffusion guards. · Timers Secondly; I see that 186 parking stalls have been allotted. This should be sufficient for 4-ball fields, such that "No Parking" should be demanded of 268th street and Kent Kangley Road. Please consider budgeting for placement of "No Parking" signs on these roads to ensure patrons of the Ravensdale Ball Park will not opt for parking in these areas rather than in the lots provided.	The lighting technology chosen for Phase 2 mitigates light pollution with focused lenses, night shields, and timers. Photometric analysis was completed to confirm the mitigation of light spill. King County Parks does not have jurisdiction over the right-of-way along 268th. The design includes adequate parking based on the master plan and development regulations. If parking impacts occur regularly along 268th during typical day to day operations after Phase 2 is complete then King County Parks will work with the neighborhood and King County Roads to address the impact. One of the solutions may be to close the right-of-way to all parking and install enforceable "No Parking" signs along both sides of 268th. The same holds true for Kent Kangley Road.	The comment writer is a homeowner of an adjacent residential property seeking a limit on offsite lighting impacts and also seeking to limit parking along 268th Street and along Kent-Kangley Road. Lighting impacts to adjacent property from spill and glare were clearly analyzed and disclosed by applicant during SEPA review. The proposal includes (as mitigation to anticipated lighting impacts) a sport field lighting (MUSCO system) consistent with all bulleted comments for lighting performance. All bulleted comments are either features, components or benefits of the specified system that overall mitigate impacts to adjacent property. The project sponsors and road maintenance agencies of jurisdiction (King County) may each consider a request for "No Parking" signs at a future date. It's likely that the sponsors will wait to see if parking use of the street develops as an offsite use. Parking along the 268th Street may be allowed. Parking along Kent Kangley Road would not likely be allowed, based on the street designations and traffic volumes. Since considering or granting a request for traffic control signs is outside of the SEPA Review jurisdiction, it is not appropriate to conduct the review of the request within the SEPA Review process. The comment writer stated parking should be sufficient (interpreted by review staff as "causing no significant adverse impact"). King County Parks agrees with the comment and the sponsor about the adequacy of the number of proposed parking spaces to support the proposal, based on the findings in the TIA report prepared by Popp & Associates, plus the applicable code.	No action to change the proposal or to proposed SEPA action.
End of Comments (Received as of 5PM March 11, 2013)			
Comments during Extended Comment Period (1 Party of Record)			

The Phase 2 SEPA checklist does not specify crowd noise as significant environmental impact for this project but should, and be mitigated. Current levels of crowd noise are disruptive to surrounding humans and wildlife. This project will double capacity and also move sources closer to rural residents. The noise associated with crowds during organized play is much greater than, in level and length of duration, the noise associated with maintenance activities. Mitigation of crowd noise to surrounding property owners in rural corridor should be indicated.	King County parks does not believe that noise associated with public recreation at this site is a disruptive impact. The site provides enough distance between the recreation activities and surrounding property owners to address any impacts related to noise from public recreation. The project design includes additional buffer plantings. Per the King County-adopted Rock Creek Vision, Ravensdale Park was chosen as the most appropriate location for public recreation because of the minimal impacts on wildlife and surrounding areas.	Under Washington state law, noise for humans is designated by each environment in WAC 173-60-030 with maximum noise levels set in WAC 173-60-040, with state agency deference to each local agency for adoption of noise levels and enforcement under WAC 173-60-110(1). For noise impacts to wildlife, the state agency with jurisdiction oversight is Washington Fish & Wildlife Department, if existing conditions for noise are of concern. No specific noise levels or wildlife species are mentioned in the comment. The term “disruptive” is unclear how it translates into a specific harm suffered based on specific noise impact created by the proposal. Background existing conditions are at issue in the SEPA review of the subject proposal. King County has adopted and has also modified state noise regulations under Title 12 of King County Code (KCC) applicable to the subject site. King County regulates noise in unincorporated areas under KCC 12.88 so long as the noise is not a public nuisance under KCC 12.92 or specifically exempt under KCC 12.94. The table in KCC 12.88.020(B) reflects allowable noise for Rural and Residential categories at 52 or 55 decibels, respectively, with provisions for short duration noise (1.5 minute, 5 minute or 15 minute) at slightly higher levels typically experienced at most similar recreation sites. In addition, noise levels after 10PM and before 9AM at 10 decibels are set below the maximum noise levels for the environment category, referenced as Class A, B or C in the table in the code text. The comment speculates that the noise ordinance for the proposal could or would be violated without any offer of proof, and without any evidence. Below the noise levels in the noise regulations, no impact for SEPA exists. Noise code violations require actual measurement of sound levels that are not possible during pre-project SEPA review. No noise levels (existing background noise, proposed levels anticipated, max. allowed noise for subject site) are included in the comment at the subject site by the proposal. No specific property owners, no specific properties and no locations of noise impact are included in the comment. The “rural corridor” is not 1 specific location, yet could apply to many properties in SE King County, most of which are not located near the subject site, or the comment maker’s property site. The Applicant proposes to follow the applicable state and County regulations for facility operations, and the SEPA Responsible Official may rely on that representation as shown in the SEPA Checklist. However, speculative, possible, future impacts are not "probable, significant, adverse impacts" as defined by state law, and therefore require no SEPA mitigation during SEPA Review.	No change to proposal or to proposed SEPA Action.

The process relative to "Notice & Application for Public Comments for SEPA Review for Ravensdale Park Phase 2 Sports Fields" has been flawed and lacked transparency expected of public project review in Rural Community. 1) No signage was installed communicating this activity to local community. Signage remains from uncompleted Phase 1 project at main park entrance . 2) Mailed Notices were only delivered to selected members within 500 Ft of Park. All members of community within stated distance of park shall be informed via mail. 3) The Notice Document directed that review artifacts were to be accessed atwww.kingcounty.gov/parks . Ravensdale Park development artifacts available for comment were from Phase 1 project. The last day of public comment found Phase 2 artifacts made available the prior weekend through advisory from King County employee T.J. Davis. 4) T.J. committed that late comments would be accepted and I provided a more comprehensive set of comments yesterday 3/15/2013. Comments included complaints of process and also quality of artifacts for review in addition to request for additional comment period. Summary of issues with SEPA checklist artifact include : a. Attachments referenced as part of SEPA checklist artifact are STILL not available. All parts of subject artifacts should be available for review and comment. b. Missing project details of restroom construction and associated waste handling are part of some Phase 2 artifacts but not referenced in others. c. Uncompleted sections in areas of Water Runoff, Vegetation Removal / Alteration, and Endangered Species Identification .	King County Parks will open up a second 21 day comment period to be certain that all stakeholders have an opportunity to comment on Phase 2 SEPA and all relevant documents.	Signage was posted at 1 site location as required by code. A photograph of the posted sign is on file at KC Parks office. Mailed notices were provided as required by code to property owners of record. Only 1 envelope to a bank was returned undeliverable. The mailing list and map was a provided artifact available during the 21 day comment period. Extended notice period was allowed for 4 additional calendar days to March 15. Documents were in fact available by access to King County homepage, then navigation to the website of documents by a provided link. Documents available during the 21-day comment period were clearly listed as included attachments on the SEPA Checklist. Other general report documents mentioned on the SEPA Checklist required comment writers to make record requests or visit KC agency offices or public library for access. Restroom construction documents are not required to be furnished by Applicant for SEPA Review by King County. The restroom building is below the threshold for building size required for SEPA Review, yet included as part of the overall description of the proposal. The proposed sanitary septic drain field will be required to meet State and County Department of Health standards, as well as King County development regulations for setbacks, infiltration, soils, layout and design requirements. The adherence to code prevents and mitigates environmental impacts. The 4 sections of SEPA Checklist mentioned have been completed in the revision circulated for 14-day comment period, to clarify how SEPA information was available during the 21 day comment period. Water runoff was addressed in more detail in the Drainage Report, vegetation alternation was addressed in more detail in mater plan report, site plan documents. Endangered species was disclosed in more detail on King County and WDFW websites. The Environmentally Sensitive Area (ESA) designation for Critical Aquifer Recharge (CAR) Class 1 has no impact on the proposal or design as mitigated and as shown in the 21-day comment period. Although the ESA and CAR designation was taken into consideration by Applicant and King County staff, the 2 labels found in KC iMap (fully available to the public during 21-day comment period, using parcel number to access) have been clarified in the SEPA Checklist revision. However, there is no effect of the CAR or ESA terms on the proposal as designed, or the SEPA action of a DNS.	No change to proposal or to proposed SEPA Action.

d. Misrepresentations of key facts such as site classification as "environmentally sensitive area" answered "no". This entire

The artifacts to be used in review and potentially establish Determination of Non-Significance are not completed to support such an analysis. The facts relative to project content are different between artifacts (SEPA checklist, Drain Plan, Pre Application Site Plan, and Traffic analysis). And artifacts are incompletely created or incorrect in points of fact.		The SEPA Checklist has been voluntarily revised, based on comments and consultation between King County parks and Applicant. The revisions do not change the proposal, only provide clarification to the proposal features and proposed mitigations included with the proposal, as well as applicable codes that address comments. The Drainage Plan, Site Plan and Traffic Analysis report required no modifications following the 21-day comment period.	No change to proposal or to proposed SEPA Action.
Your help is being requested today to insure an open and transparent process providing public review of this key phase of Ravensdale Park project. The park foundation whose interests associated with "maximum sports field density" appear to place this goal above ALL other considerations including environmental impact and growth management concerns that we in the community favor. The approval of eliminating vegetative cover favoring impervious surface installation on 7 acres of 10 acre project site deserve public disclosure ,review + scrutiny, and seem contrary to CAO and 2012 Comprehensive Plan. This circumstance in itself if implemented will significantly degrade the Rural community park character of natural surroundings and valuing wildlife.	The Ravensdale Park Foundation is the community's steward of the community master plan which was developed in 2008. The adopted master plan was the result of compromise between community all the community interests which included ballfields, passive space, playgrounds, picnic areas, etc. Wildlife habitat preservation is addressed by the King County-adopted Rock Creek Vision. Ravensdale Park was identified as the most appropriate location for public recreation. (See above for detailed description).	KC Parks has no special duty to the comment writer. The general duty administered by King County Parks is for SEPA Review, including public notice and a comment period. The Applicant's intentions are not known. The comment speculates on the Applicant's intentions with respect to environmental impact and growth management. The proposal includes synthetic sport field surfaces that are permeable to subsurface as well as paving for parking area and walks that are impervious. King County Surface Water Design Manual treats synthetic surface as impervious for storm water calculations. The 2 different impacts of the 2 types of surfaces are known and also disclosed in SEPA Checklist, attachment drawings. Consistency of the CAO and Comprehensive Plan for the existing vegetative cover converted to paved and synthetic surface are featured in the proposal. The comment asserts a lack of consistency, yet no specific inconsistency is referenced. Also, not specific impact to a regulated system in the CAO or Comprehensive Plan is mentioned. No specific harm suffered is mentioned. No specific corrective action to mitigate the asserted impact or to prevent harm or to provide relief are identified in the comment. The visual changes to the rural community park character have been incrementally studied, documented, reviewed and approved by King County agency over past 3 decades at the subject site. While some adjacent property owners may view the incremental visual appearance change as a degradation, most residents living inside the Urban Growth Boundary established to meet state law consider the changes to the subject site as improvements to recreation levels of service, improvements to safety for players using sport fields, reduction in fuel use to drive to recreation sites from homes and other community benefits consistent with predominantly rural visual character of the site.	No change to proposal or to proposed SEPA Action.

Please insist upon proper opportunity for public review and comment of Phase 2 Park Plans and SEPA documents. Also provide assurances that full environment impact analysis be completed with open process of public review and community understanding**.**	King County Parks will open up a second 21 day comment period to be certain that all stakeholders have an opportunity to comment on Phase 2 SEPA and all relevant documents.	The SEPA action steps following the close of the March 11 public comment period (21 calendar days, plus 4 days additional for comment writer) include revision of SEPA Checklist, SEPA Notice of Action with 14 day comment period. The required SEPA review process steps have been followed, including provision of an optional second 14-day comment period following the 21-day required comment period.	No change to proposal or to proposed SEPA Action.
Projects of this density of development should be placed within Urban Growth boundary and not in critical rural environmental area.		The proposal is not a residential development, so the term “density” as used in the KCC is not applicable. The project is not similar to others identical, so the concentration of similar proposals does not create any density. The comment is inconsistent with several prior public actions and decisions previously made by King County Council in conformance with County planning regulations as well as the state Growth Management Act for future land use map designation, zoning designation of the subject site, and adoption of applicable development regulations all of which specifically allow for the subject proposal to be located, constructed and operated as a recreation land use on the subject site.	No change to proposal or to proposed SEPA Action.

More time requested today to allow for adequate time for Public Review of artifacts at location http://kingcounty.gov/recreation/parks/about/notices/ravensdale-park-s epa.aspx Please also note and include the following in current comments: Phase II plan artifacts were not available on King County Web site for majority of current public review period (prior to 3/9) and review / comment period should be extended. Suggested process improvement would be to include URL referencing artifacts as part of Letter sent to key Stakeholders. * Cursory reading of traffic analysis does not provide for increased parking on surrounding streets during peak usage periods (such as tournaments). Real economic impact will be levied upon landowners if King County does not mitigate parking on streets around park due to shoulder maintenance. Parking regulation and associated signage should be provided as development condition of phase 2. King County Parks should indemnify responsible landowners for maintenance cost impacts of increased park traffic.	King County Parks will open up a second 21 day comment period to be certain that all stakeholders have an opportunity to comment on Phase 2 SEPA and all relevant documents.	Noted and provided as requested. Noted. See responses below. Noted. The SEPA Review of 1 proposal under the code and state law provisions for public notice does not require process optimization or customizing for process stakeholders. The code requires: 1) publication, 2) mailing to property owners within 500 feet. Increased parking on surrounding streets is speculated, not probable, significant or an adverse impact. If the parking need develops, the process provided in the KCC administered by KC Roads staff and KC Engineer apply.	No change to proposal or to proposed SEPA Action.

The Ravensdale Park Phase 2 site is key wintering habitat for resident Elk herd. The available level of open feeding and bedding area is at issue. Damage already done to this site from Phase 1 construction has increased stress to wintering herd as demonstrated by more frequent ranging towards Kent watershed in search of winter feeding habitat. Removal of natural ground cover supporting wildlife outside of Urban Growth Boundary should be discouraged. Site survey on 3/10 showed clear signs of herd use throughout proposed development site. Restoration after Phase 1 construction did not replace vegetation in non- construction area that destroyed feed grasses. Non-native sandy soil clearly visible amongst sparsely growing replacement grasses apparent.	Wildlife habitat planning in this area is addressed by the Rock Creek Vision. Please see above for additional information about the Rock Creek Vision.	Noted. The presence of migrating elk was disclosed in the SEPA Checklist. The elk herds using this region of SE King County regularly cross paved roads with traffic (The road segment from Hobart to Ravensdale north of the site is 1 example directly observed by the SEPA reviewer), paved walks, and widely traverse throughout this region of SE King County regularly, including the subject site. Noted. Feed grass planted on non-native soil is an existing site condition, not addressed by the Phase 2 proposal, nor made better or worse by the proposal.	
Additional human traffic and lighting after winter dusk is contributing factor to stress driving wildlife from park site and should be mitigated.		Noted. Additional traffic and lighting are required by the combination of developing lands located within Urban Growth Boundaries subject to state law and King County codes. As such, these are 2 unavoidable impacts as the Comprehensive Plan and development regulations clearly recognize. Adding traffic with paving or traffic without lights creates predictable safety conditions that are avoidable impacts by adding paving and lights.	
* Biological inventory should attempt to identify nesting sites of Redtail Hawk / Eagle prior to commencement further construction.		Noted. No site specific inventory for possible nests is required. Redtailed Hawks frequent this vicinity of the site, and frequently build, use then abandon nests.	
□* This increase Field Capacity 2-3 times and associated traffic□will unavoidably increase noise, crime and pollution in and around□ park in this designate rural community. Detailed design elements□should mitigate impacts.		Noted. See response to similar comments above. The proposal mitigates impacts disclosed in the SEPA Checklist. However, the Applicant is not required to mitigate all impacts (Unavoidable impacts, impacts below thresholds, etc.)	

End of Extended Comment Period Comments (Closed on March 17, 2013)			
Optional Comments Received March 18 after March 11 – Considered by King County with approval by Applicant to be included in the SEPA review		Applicant and King County are under no code or state law required duty to consider or to response to any late comments received after the advertised comment period of 21 calendar days ending March 11, 2013. However, King County and Applicant desired to enable and provide a robust, open and very complete SEPA public review and comment period, and therefore both agreed to include the responses below on late comments, and also fully consider the late comments along with all comments properly and timely filed as formal SEPA review comments above. Consequently, the comment writer is now acknowledged as a party of record making comments. One comment writer requested more time (not required), and also requested a second public comment period (none is required) every comment maker who stepped forward with submitted comments received due consideration on the substance of the comments received. King County Parks and Applicant fully considered all comments made, including 2 comments of similar nature on similar topics both received after March 11. The 21 day period was posted at site, publicized on website, advertised in newspaper as required. Finally, the comment writer received mailed notices, as properties located within 500 feet of site perimeter.	No change to proposal or to proposed SEPA Action.
(Note: The comment writer is a Rock Creek Ranch resident) expressing concerns regarding the due diligence that needs to be followed before expanding the Ravensdale Park. Concerns around the process (or lack thereof) that as tax payer we expect our paid government officials to address are the following:	The existing master plan was negotiated among all the community interests in 2008 and proposed to King County Parks by the community. For more information about the master plan process please visit: www.greatermaplevalleyareacouncil.org/ravensdale.html In addition, King County Parks will open up a second 21 day comment period to be certain that all stakeholders have an opportunity to comment on Phase 2 SEPA and all relevant documents.	Noted. King County parks staff and applicant requested inclusion of the comments as part of SEPA review. The optional comments with responses were submitted to King County Council and key agency staff for due consideration. Taxpayer expense and cost efficiency of the project delivery method for this proposal is addressed by the more detailed response to the last comment below.	No change to proposal or to proposed SEPA Action.
The principles of high density / low density development be followed. There are people who chose to live in the city and like/bought homes that are packed together. Then, there are those of us who moved out further to have space, quiet, dark, and room to roam in peace. Any development that happens in low density areas like ours needs to confirm to those standards and not be a high density "transplant" where others bring their high density plans into our area and jam in development to stretch their dollars.	Ravensdale Park was identified as the most appropriate location to provide public recreation to the rural residents in this area. The existing master plan was negotiated among all the community interests in 2008 and proposed to King County Parks by the community. For more information about the master plan process please visit: www.greatermaplevalleyareacouncil.org/ravensdale.html	Noted. King County agency decision making for the protection and development patterns within SE King County has included several sub area plans, community plans and outreach efforts that have included Ravensdale residents in land use decision making process, including the adopted long range future land use plan and the Ravensdale Park Master Plan. The proposal was determined by King County staff, at this stage of permit review (SEPA Review, predecisional information and public comment on all permits), to be consistent with the master plan and the comprehensive plan.	

Ensure that Phase I is properly completed and cleaned up before work on ANY next phase is granted. The work entrance to the park is a total eyesore concrete barriers, rocks and tarps etc ... If there isn't money to sufficiently complete Phase I, they won't complete Phase II completely either and after it's done there is no leverage to ensure the prior step is completed right/fully.	Phase 1 construction activities are still under way at the site at the community meadow. Once the meadow is completed this will conclude Phase 1 construction activities. The meadow will be completed prior to the construction of Phase 2.	Performance on the 2011 Clearing & Grading Permit for Phase 1 is more properly not a SEPA review and comment matter for the Phase II proposal, except to be considered as an existing site condition. However, King County Parks staff has no reported complaints on file (prior to SEPA comments for period ending March 11) for Phase 1 site area or the site in general. Also, there are no planned corrective actions on file at King County for actions needed on any site conditions reported by comment writer. King County Environmental and Permitting has no permit related punchlists or corrective actions planned, or required by the sponsors of Phase 1. Applicant's consultant visited the site during March 22 to 28, 2013 following the receipt of this SEPA comment on March 18, at King County Parks staff's request to report back to King County Parks specifically what existing condition or feature (based on comment provided) exists today that needs be included in Phase II, as requested by the comment.	
Draw up full / complete/ easy to understand plans so everyone knows what is truly coming. The existing plans feel like a high density urban eyesore more than a peaceful, relaxing, beautiful park. I fully support kids sports, as I played many as a kid, but not at the expense of other communities making our rural park their high density sports park that jams in sports fields to create a concrete jungle rather than a park our community wants to visit. Specifically they need to address:	The existing master plan was negotiated among all the community interests in 2008 and proposed to King County Parks by the community. For more information about the master plan process please visit: www.greatermaplevalleyareacouncil.org/ravensdale.html	The demand for sport fields for soccer and lacrosse will be met by the proposal. The Traffic Impact Report addresses the level of attendance expected, to the detail needed. The park design has been prepared according to the master plan. The Phase II proposal was designed by a WA professional landscape architect as required and enabled in compliance with RCW 18.96. The project landscape architect is charged with the general public duty of assuring aesthetic considerations for the site context along with applicable King County regulations for park design, layout, program features and visual appearance. There are no specific codes requiring site design for a rural park. The master plan was followed, and perimeter trees in natural groups (planted in Phase I, plus supplemental planting in Phase II) are included.	
Parking: On big games/tournaments they need far more parking, or our side streets will become overflow parking and we'll be left with the noise of slamming car doors and left over trash	King County Parks does not have jurisdiction over the right-of-way along 268th. The design includes adequate parking based on the master plan and development regulations. If parking impacts occur regularly along 268th during typical day to day operations after Phase 2 is complete then King County Parks will work with the neighborhood and King County Roads to address the impact. One of the solutions may be to close the right-of-way to all parking and install enforceable "No Parking" signs along both sides of 268th. The same holds true for Kent Kangley Road.	Noted. See response to the same comment above on traffic demand, expected crowd sizes, parking management and sign posting for streets adjacent to park site for the proposal. Litter pick up on County right of way is currently handled as a volunteer program, with community volunteers assigned to specific road segments. Litter pick up on the property generated by events at the site will be managed on a regular basis.	
Additional restrooms: The current facilities are not sufficient or convenient to the breadths of the planned park... none of us want people "going in the bushes" by our homes. If facilities are upgraded they need to conform to modern building and septic standards.	Additional restrooms are included in the Phase 2 design.	Provided as requested. The proposed restroom facility in the proposal is a prefabricated, vandal resistant, durable concrete structure sized for anticipated games and event use served by septic sanitary drain field to be designed and permitted by WA State Dept. of Health and King County Dept. of Public Health.	

Lighting: It was interesting the lighting plans were all about maximizing the playing surface and nothing was studied or planned about the light impact to the community who moved our here to enjoy the stars and don't' want to be kept awake at night or have their quiet/dark nights wrecked by banks of lights on at all hours of the nights just yards from our homes.	The lighting technology chosen for Phase 2 mitigates light pollution with focused lenses, night shields, and timers. Photometric analysis was completed to confirm the mitigation of light spill.	Lighting levels provided clearly show a drop off in spill and glare light at the perimeter of the site with specific expected light levels modeled and provided. There is no specific SEPA requirement for offsite light levels (max. allowed) yet SEPA generally encourages avoidance or mitigation of offsite impacts on the SEPA Checklist. The proposal provides a system that mitigates (minimizes) the offsite lighting impacts to adjacent property. There is no “dark sky” adopted code requirement applicable to subject site, or applicable to comment writer’s site. The comment does not include any specific impact (not light level above which impact is intolerable, preventing star viewing) although harm suffered is generally suggested yet the comment overall does not establish any adverse significant impact. Offsite light is pre-mitigated by the proposed system to reasonable levels, by the proposal design. The system is not designed to operate “all night”. Short periods for lights at initial energizing, test and balance, aiming, etc. may be a temporary impact to adjacent properties. Timers and photo cells will control light hours of operation.	
Noise: Plans need to drawn up to limit the hours the stadiums can be used, and effective/proven sound blocking mechanisms like additional trees, berms, sound walls installed. Right now the fields are far enough away that the light is noticeable and annoying... but when two proposed stadiums move within yards of our homes the screaming, cheering, car doors slamming etc will seriously degrade our lifestyle.	King County parks does not believe that noise associated with public recreation at this site is a disruptive impact. The site provides enough distance between the recreation activities and surrounding property owners to address any impacts related to noise from public recreation. The project design includes additional buffer plantings.	See response to similar comment above for noise requirements, noise mitigation at the subject site also applicable to the comment writer’s residential property in Rock Creek Ranch.	

Wildlife and water preservation. If it's the law to study/protect our environment for other construction, then due process needs to be followed here as well.	Wildlife habitat planning in this area is addressed by the Rock Creek Vision. Please see above for additional information about the Rock Creek Vision.	Wildlife including mammals and birds are regulated by WDFW agency. However, no agency review comments were received on the proposal from WDFW. Also, King County has wildlife habitat requirements in the code. The applicable codes were applied to the subject site. As a result, there is a need to provide wild elk meadow habitat in the designated perimeter areas of the overall property, a feature included as required on the proposed site plan. Retained and planted trees and shrubs of native species will assure lifecycle habitat is provided long term at the proposal site. There is no specific wildlife mentioned, also no specific harm suffered or suggested action by the comment. Water conservation is implemented by the proposed synthetic surfaces on the 2 playing fields (in addition 1 existing field) instead of natural turf requiring irrigation. Water savings are significant for the proposal as self-mitigated for water demand thereby providing the requested water (supply) preservation long term that the comment requests. Infiltration from storm water system after water quality treatment assures long term water supply recharge as required by the Critical Aquifer Protection site designation. No specific impact is reported and no specific harm suffered was noted.	
Accountability: I'd even propose the developers need to post a sizable $ bond to ensure plans are fully/completely done before they get their money back to ensure they clean up after themselves which they still haven't done from Phase I.		King County Parks does not require a performance bond from the applicant during SEPA review. There are specified storm water and road improvements, based on consultant's estimates and contingency to meet site permits that require bonds until the system or feature is accepted by King County following construction. To clarify, the applicant is not a developer. The applicant is a non-profit organization with a mission and purpose to construct and manage King County Parks and Recreation facilities at the subject site. King County has determined the best delivery vehicle for meeting parks facility needs for upgrades is to use the Ravensdale Foundation, a non-profit organization, as permit Applicant and project sponsor. There are several recent successful examples throughout King County using the same type of delivery method selected by King County Parks for Phase II, the proposal under SEPA review. See additional comments in the response to the comment above for Phase I (perceptions of work left uncompleted, or not in compliance, yet no reported specific actions on file at King County). King County Council members receive a copy of the comments and the responses, at Applicant's request.	
End of SEPA Comments – received March 18			