

**Delivered via email**

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**Re: Pacific Raceways Response to KC LUT4-0003 Review  
Comments: Air Quality, Noise, GHG, Light/Glare**

Date 03.26.2018

Dear Mr. Fiorito,

At your request, Ramboll US Corporation (Ramboll) has prepared the following responses to comments that pertain to environmental noise, air quality, greenhouse gas (GHG), and light/glare, as prepared for Pacific Raceway's Interim Use Permit (IUP) Application within a documented titled "Pacific Raceways Expansion Project, Kent Washington: Environmental Noise, Air Quality, GHG, and Light & Glare Report", dated December 2017 and prepared by Ramboll (then Ramboll Environ). The review comments summarized within this letter were prepared by Ty Peterson of the King County Department of Permitting and Environmental Review (DPER), titled "RE: LUT4-0003 Review Comments", dated March 5, 2018.

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The following comments are provided within the DPER letter under the heading "Environmental Noise, Air Quality, GHG, and Light & Glare Report", beginning on page 3 of the letter. Comments are numbered from 1 through 10. Ramboll has provided responses to each comments below, organized by DPER comment number. Note that some comment responses have resulted in edits and revisions to the Ramboll report, as noted.

**DPER Comments and Ramboll Responses**

**1. DPER Comment:**

DPER agrees with Ramboll's findings that there is a potential for a moderate adverse impact from construction related activities and that mitigation measures are warranted. However, there is no demonstration that the identified measures would reduce the impact to a minor or less than significant level. Monitoring of construction noise in and of itself will not reduce noise levels. Recommend adding a mitigation measure for providing additional

temporary noise barriers for noise activity (gravel screening and loading) if warranted by monitoring.

**Ramboll Response:**

Ramboll has added language to the Noise/AQ/GHG/light report that addresses possible noise mitigation measures, and further explains the process by which noise monitoring data will be used to evaluate whether noise mitigation is warranted and the potential effectiveness of these measures. See report Section 4.1.1.1.

Note also that Pacific Raceways has since committed to installing a permanent noise monitoring station along the eastern property line. Noise monitoring data will be used to support the assessment of noise levels at this location and whether noise mitigation is warranted.

**2. DPER Comment:**

There is no analysis of the potential noise impacts of truck loading/queuing and addition of truck trips to the local roadway network. The report states that there would be a total of 40 truckloads (80 truck trips) per day over a period of 3 to 5 years. This duration seems correct given that there is 1,000,000 cubic yards of material to be removed and assuming 16 cubic yards per truck, but please update in accordance with the comment #2, page 1 under "General" above.

**Ramboll Response:**

Noise from haul trucks moving at the west side of the site was included in the noise assessment, and is principally from low speed haul truck engine noise. Relatively short periods of queuing that might occur would be acoustically negligible compared with overall construction noise emissions. Loading of trucks will be completed such that noise from these events is minimized (i.e., dropping into the truck trailer from as low a height as possible). The assessment of construction activities focused on the primary sources of noise, including haul truck movement, screen operation, and loaders.

Regardless, note that Pacific Raceways will be monitoring all aspects of construction at its eastern property noise monitoring terminal (see Comment #2 Response, above). Any and all sources of noise that may result in high levels of noise off-site will be reviewed, as warranted.

**3. DPER Comment:**

The operational noise impact analysis sets no quantitative criteria (nor are quantitative criteria set for air quality or GHG analysis). However, the operational noise analysis does predict an increase of 5 dBA which it characterizes as readily perceptible. The analysis then makes the argument that its analysis is overly conservative and therefore the impact is actually not significant. In a perfect world it would be best to set impact criteria and then make a finding, but DPER understands this is not always possible in areas where definitive criteria have not been established. That said, it would probably be better to prepare an analysis that is less based on overly conservative assumptions so that the finding is not made through backtracking.

**Ramboll Response:**

Ramboll has revised the assessment with less-overly conservative assumptions: that up to 6 garages (of 12 total) would be operating fully at any one time, with doors open. The revised assumptions of operation is still considered conservative and results in slightly lower overall off-site noise emissions.

Ramboll has edited the report to reflect this revised assumption. See Section 5.1. Also, note overall increases in off-site noise levels would be between 2 and 3 dBA above existing conditions under the newly assumed conservative assessment. Increases of 3 dBA or less are generally not noticeable in typical outdoor noise environments.

**4. DPER Comment:**

It is the operational noise, after occupancy of the proposed buildings, which is to be mitigated by a noise wall and the proposed lowering of the site. The conclusions of the Noise/AQ/Glare Report (p.22) state that the lowered, expected depth of the site and the proposed noise barrier will mitigate noise impacts, thus "noise impacts are not anticipated". Noise modeling should confirm this. Please provide noise modeling that compares a lowered site to that of a non-lowered site. Similarly, the justification for the earth wall greatly enhancing the noise mitigating effects of the proposed noise wall, should also be supported by the noise modeling analysis and a technical explanation of how this conclusion is reached.

**Ramboll Response:**

Ramboll has revised the report and included a summary of the benefit to excavated terrain and construction of a 12-foot noise barrier (up to 9 dBA reduction). See Section 5.1 and report Table 6.

**5. DPER Comment:**

It is not clear in the Noise/AQ/ Glare Report whether the photometric analysis was done with a lowered or non-lowered site, or if topography was a variable included in the model. The models should include both, to lend understanding and justification to confirm the conclusion that "should excavation not occur, a much taller noise wall would be required to achieve similar light and glare mitigation".

**Ramboll Response:**

Ramboll completed the photometric analysis with a lowered topography, as proposed by Pacific Raceways. As noted in Figure 3 of the report, the footprint of the facility's lighting impact does extend beyond the project's boundary. A revised model to compare with and without lowered topography would not alter these results. However, Ramboll has added a qualitative discussion of the reduction in potential impact from headlights facing east, as a result of lowered topography and a noise wall. See Section 5.4.

**6. DPER Comment:**

The Traffic Impact Analysis estimates that the proposed project would generate 1,366 operational trips per day. The report concludes that this would likely not result in a noticeable increase in roadside noise levels, this should be demonstrated through modeling or acoustical principals.

**Ramboll Response:**

Traffic at the project site would be acoustically negligible. However, Ramboll has added peak-hour traffic (i.e., highest volumes, worst-case) to the assessment of operational noise. Results confirm that traffic noise levels at off-site receivers would be negligible. See Section 5.1 for a summary of the traffic noise assessment, and a revised Table 5 summarizing traffic noise model results.

**7. DPER Comment:**

The air quality analysis cites required mitigation measures as adequate for reducing impacts from construction dust generated during the excavation screening and loading of 1,000,000 cubic yards of material. However, it is never stated what these required measures are in either the regulatory setting or in the impact analysis. Recommend adding specific dust control measures as a part of the project or as mitigation.

**Ramboll Response:**

Pacific Raceways will operate a water truck, as needed during excavation activities, to reduce dust at the site. The Report has been revised to include this statement. See Section 4.2.

**8. DPER Comment:**

The analysis assumes that because the region is classified as an attainment area for all criteria air pollutants that there is no potential for localized particulate matter standards to be exceeded and quantification is not necessary. However, given the substantial excavation and gravel processing proposed, the annual particulate emissions from construction should be estimated and compared to a quantitative standard to demonstrate that this is a reasonable determination. Such standards that may be used are the PSCAA's new source review standards or the *de minimis* thresholds of the federal general conformity act for the least (marginal) non-attainment areas, while acknowledging that such a standard does not legally apply to the project in this area through PSCAA.

**Ramboll Response:**

The excavating and screening of material is part of the project's temporary construction program, and was not considered as part of the operational air quality assessment. Regardless, PSCAA provides specific exemption for 1) Portable nonmetallic mineral processing plants, and 2) Fixed nonmetallic mineral processing plants, provided under PSCAA Regulation 6.03(C)(112) and (113), respectively. Note that PSCAA 6.03(C) states that "*A Notice of Construction application and Order of Approval are not required for the following new sources, provided that sufficient records are kept to document the exemption.*" Because these facilities are exempt and would generate relatively low levels of air pollutants within an area that is in attainment with for all air quality pollutants of concern, the assessment of air emissions from these sources was not warranted.

**9. DPER Comment:**

It is unclear if truck trips to remove excavated material were included in the GHG emissions analysis which relied on the King County GHG Worksheet.

**Ramboll Response:**

Trucks were not included in King County GHG worksheet. Note that excavation activities during construction would not introduce new sources of GHG into King County, but rather would change the routes of gravel transport from would-be gravel extraction areas to Pacific Raceways. That is, the net result would be no new sources of haul traffic, but rather that haul traffic would now access the Pacific Raceways site to load gravel, and would no longer access a different gravel site. In some cases, it is anticipated that gravel extraction would have otherwise occurred at a facility farther from the gravel end user, thereby resulting in an overall net reduction in GHG due to haul traffic accessing Pacific Raceways.

**10. DPER Comment:**

GHG emissions are compared to statewide emissions in an effort to demonstrate that these emissions would be less than significant. ESA recommends that amortized annual emissions be compared to the State of Washington GHG reporting threshold to further substantiate the less than significant impact.

**Ramboll Response:**

Under the auspice of SEPA, the State of Washington no longer publishes reporting guidance for GHGs. The prior SEPA-based thresholds required the qualitative disclosure of new GHG emissions for projects that are expected to generate between 10,000 and 25,000 metric tons of carbon dioxide equivalents (CO<sub>2</sub>e) per year. Beyond 25,000 annual metric tons of CO<sub>2</sub>e, the State's guidance required a quantitative analysis of the emissions, but did not provide a bright-line for significant impacts. The State does publish reporting requirements for stationary sources, but this project does not qualify as a stationary source under those regulations. Note that an estimate of annual GHG emissions for the project is summarized in Table 6, Section 5.3 of the Report. Ramboll estimated annual GHG emissions at 5,037 metric tons of CO<sub>2</sub>e, per the King County SEPA GHG Emissions Worksheet.

Please do not hesitate to contact me if you need any additional information.

Yours sincerely,

Ramboll

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