

Attachment E

MISCELLANEOUS FEEDBACK FROM PRELIMINARY TESTING (AS OF 12/15/99)

Applicant comments

- Need a place for a longer project description (2/3 to 1 page)
- Need to eliminate ambiguous words such as near and adjacent
- Need a lot more guidance (e.g. how to define a flood zone)
- Get rid of double columns in parts A and B (hard to follow on a hard copy form)
- Want an explanation of why the question is important (to help them understand what type of information is desired)
- Wants examples of answers (e.g. potential adverse impacts)
- Like the yes and no format in Part C
- Applicants equated a request for information about changes as a request for information about impacts

Experienced applicant comments

- Thought the questions were pretty self explanatory except for some definitions (e.g. substantial)
- 80% of the form takes 1/10 of the time as the current form
- 20% of the form takes twice as long as the current form
- Consultants are going to be willing and able to answer the 2nd questions in Part C
- The form makes the applicant think about the environmental impacts of their project. When they answer yes in part C, they must think more about the issue. The old form was more an exercise of cut and paste from different documents.
- Won't have exact Critical Area information at the time of filling out the form (e.g. wetland studies would not have been completed)

Agency comments

- Looks more like an EIS

Observations

- Observed applicants did not differentiate between GMA critical areas and areas with the same name (e.g. wetlands)
- Observed applicants had difficulty differentiating the proposal from existing activities (e.g. an existing hatchery using water with a proposal to protect a stream bank)

Comments from Darcey Fugman-Small (12/16/99)

On the Project Review Form:

Patty- I have done a quick review of the info sent and have some initial comments. I thought I would send them ahead, since I am not sure how Friday will work as far as those of us who are not in attendance.

1. Attachment C, Issue 1: I feel that bullet (or arrow) 5 should be kept foremost in our minds. Our experience is that often the agency is the most knowledgeable of local and state regulations. While we have some developers who go through the process repeatedly and have a higher level of awareness of regulations, at least as many or more applicants go through the process only once and cannot be expected to understand or to sort through the codes for what does and does not apply to them. That is what they rely on us for and that is the type of assistance that our elected officials expect us to give them. I prefer Option 2, with some combination of Attachment A and B, Alternate Format 1.
2. Issue 2: I prefer Option 2, with a combo of the first 2 formats as above. I do like the idea of being able to refer to a staff report. However, they are usually completed after the SEPA process is well on its way.
3. Issue 3: While SEPA/GMA education is needed, the middle of the permit process is hardly the place to do it. At that point, citizens expect something to happen to their application, not to be "educated". Again, the majority of our clients are one-timers and have no desire to become experts. Option #4 is my choice here.
4. Issue 4: Considering our environment, this is not my area of expertise and I leave this to others.
5. Issue 5: This level of detail is not useful to us. The second option is preferred, although "acres" seems to be a large measurement in urban areas and many people do not have a clue as to what an acre is. The option of square feet may be helpful.
6. Issue 6: Contracted out portions cannot be ignored. Options 3 or 4 work best for me as they also provide consistency from project to project in analyzing impacts.
7. Issue 7: The format is hard to follow and not very professional

In a follow-up phone call to Darcey, I asked her "Do you think this form has a future?"

She said yes, that the existing one isn't adequate. Some of the things in the new one are good... but she is still real concerned with complexity, concerned whether the average person can fill it out. She thinks not.

She wonders: how do we deal with the fact that we have City of Seattle and City of Everett with complicated projects versus Walla Walla with an applicant for a condition use permit for a beauty salon in her house. These applicants won't fill it out.

This checklist is almost between a checklist and an EIS.

Comments from Darcey Fugman-Small (12/16/99)

On the Nonproject Review Form:

Darcey's initial reaction:

- Consolidates GMA and SEPA
- Looks like a nonproject EIS
- Looks like a planning document rather than an environmental review document
- Example of a small nonproject proposal: changing the height requirement for an industrial structure

Feedback on Fundamental Premises:

- Agrees with fundamental premises

Feedback on Process:

- An option for analyzing small projects might be to fill out the form at the end, not a lot of information would likely be provided
- The form helps people show their work. (e.g the Growth Management hearings board asks agencies to show their work)

General feedback on content:

- Could help small communities walk through the nonproject process
- Could be used as a staff report
- If there are unnecessary questions or questions not required by SEPA in the document and the document is required, they would still likely be challengeable – this could be a concern for lead agencies

Other feedback:

- If we are going to do it, make the form mandatory
- Prefers only one form not multiple forms for simple vs. complicated nonproject proposals
- Doesn't know of any obvious formal actions that could be used as triggers for beginning to fill out the checklist