People for an Environmentally Responsible Kenmore
PERK

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November 12, 2026

Opposition to the proposed Strom Spa at the Lodge at St. Edward Park

Dear Parks Commissioners,
On November the 18th, we believe that:

Parks Commission should reject the proposed sublease that dramatically expands the commercial use of the The Lodge at St Edward Park for reasons including:

1. The SEPA review by the City of Kenmore is flawed, and does not accurately evaluate the potential impact of the spa expansion on the environment and the public. It appears that the City of Kenmore is trying to rush / rubber stamp the SEPA (State Environmental Policy Act) process by doing this as a SEPA Addendum. The proposed Spa change is an entirely new / substantially different proposal that needs a new threshold determination or which should require an SEIS (Supplemental Environmental Impact Statement).

   Comparing WAC 197-11-600(4)(c) and (d) seems to outline when it is appropriate to use a SEPA addendum vs. an SEIS. The key is that the information to be given in an addendum "does not substantially change *the analysis* of significant impacts and alternatives" in the existing (2017) document. From our citizens' site visits and reading of the documents we believe there is a significantly different set of structures not initially considered in the FEIS, and so it does substantially change the analysis. More research and peer reviewed articles are needed. For example:

   - In the 2016 FEIS (Final Environmental Impact Statement), the area of the "Proposed East Spa Garden" was noted to be a space for an "organic farm" with little to no new impervious surfaces. The Spa proposal you are considering (2026) has what looks like a large amount of new impervious surfaces.
   - A Spa <u>is</u> mentioned in the 2016 FEIS: <u>but</u> all consideration of the "spa" is isolated to the basement level of the existing seminary building.
   - Further – there is no consideration for the operational effects of the spa on the environment, which include:
     - Chemical contents of the pools
     - Filtering the pools
     - Heating the pool
     - Lighting the pools (wildlife effects)

    - Pest control around the pools
    - Preventing wildlife from being drowned in the pools
  - Nor is there any mention of the increase in impervious surface created by the two pool areas
  - The parking evaluation is wholly inadequate, assessing parking issues post-construction seems a little "closing the barn doors after the horses have left." Further, although alternative parking/shuttle mitigation scenarios were mentioned, none appears to be fully developed or finalized. In the absence of a commitment to enact any of these scenarios there is no assurance that they will be implemented.

2. We are concerned that the public has mostly been excluded from opportunities for public comment, in part by the limited amount of information that has been made available to the public. Public notice mailers were received less than a week before the comment deadline, and only sent to addresses near the Park. Given the popularity of this Park to all Washingtonians, it would be reasonable for the public to have a voice in the Park's future, rather than be told that the Lodge/Spa will have an extension from 62 to an 80 year lease. Given that there is more than a little uncertainty in the viability of this enterprise, the future of the Strom Spa at The Lodge at St Edward Park seems even more precarious as a business venture and is, therefore, a possible economic burden to the State in the future. Would there need to be a bond to protect the State from failed business?

3. There should be more time for the public to learn and to meet the proposed sublessee of The Lodge at St. Edward Park. The City of Kenmore in the past hosted meetings for the public to ask questions of Daniels' Lodge in the past, so we would hope to have the City invite the lessees.

Thank you for the opportunity to comment.

We hope the Parks Commission will deny this request and send the proposal back to the City of Kenmore for a proper and public SEPA process to replace the SEPA addendum. We want to assure that any significant adverse environmental impacts are addressed. These include not only potential harm to the environment and wildlife but also the exclusion of individuals and families that simply desire to access the natural beauty of the Park.

Sincerely,

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