

**FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR THE
PORT TOWNSEND COMPREHENSIVE PLAN**

City of Port Townsend

Prepared in Compliance with:

**The State Environmental Policy Act of 1971,
Chapter 43.21C, Revised Code of Washington,
SEPA Guidelines, Effective January 16, 1976
as revised April 4, 1984
Chapter 197-11, Washington Administrative Code**

Date of Issue: July 3, 1996

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I. PREFACE

The purpose of the Final Environmental Impact Statement (FEIS) is to consider the impacts of the Draft Port Townsend Comprehensive Plan. The FEIS consists of two documents, the first of which is the Draft Environmental Impact Statement (DEIS) portion of the integrated Draft Port Townsend Comprehensive Plan and DEIS, which was issued on January 10, 1996. That document was prepared to fulfill the requirements of both the State Environmental Policy Act (SEPA) and Growth Management Act (GMA), and includes chapters which analyze, at the programmatic level, the environmental impacts of the four alternatives to the Draft Comprehensive Plan (as required under Chapter 197-11-405 WAC). The four alternatives analyzed were: the "No Action Alternative (Existing Plans and Regulations); Alternative #1 - "Residential Community" (Dispersed Growth); Alternative #2 - "Community Neighborhoods" (Focussed Growth); and Alternative #3 - "Urban Community" (Concentrated Economic Growth). A preferred alternative was not identified in the DEIS.

This document is the second document of the FEIS. It summarizes the "Preferred Alternative" embodied within the goals, policies, implementation steps, and land use map contained within the Draft Comprehensive Plan. The Preferred Alternative represents a hybrid between DEIS Alternatives #2 and #3, and is based upon the work of five citizen workgroups, as well as public comment letters and testimony received at the public hearing on the DEIS.

The key section of this document responds to individual comments made in letters submitted prior to the DEIS comment deadline on February 9, 1996. All comment letters on the DEIS portion of the integrated SEPA/GMA Comprehensive Plan are reproduced in this document, as is the substance of the oral questions and comments submitted during the DEIS public hearing. In general, responses were prepared for substantive comments pertaining to errors or omissions in the DEIS. Statements of concurrence with assessments, assertions, or personal positions on an issue, and value judgments have been acknowledged and incorporated in this FEIS without further substantive response.

The FEIS (*i.e.*, both the integrated Draft Plan/DEIS document and this document) is intended to be used as a framework for more detailed environmental review of subsequent projects and programs. Specific projects, whether initiated by the private or public sector, that have been determined to have a probable significant adverse environmental impact on the environment will be required to prepare an EIS (Chapter 197-11-360 WAC). However, parts of this FEIS may be used by future preparers of EISs to revise and/or reduce the scope of their EIS by reference to relevant information contained in this document (Chapter 197-11-443 WAC).

II. FACT SHEET:

Port Townsend Comprehensive Plan Final Environmental Impact Statement

Title of Proposal: The Port Townsend Comprehensive Plan

Description of Proposal: The proposal is to adopt a new Comprehensive Plan which includes a description of existing conditions, goals, policies, implementing strategies, and land use map to guide growth and development in the Port Townsend Planning Area over the next 20 years.

Location: The Port Townsend Planning Area includes the area within the Port Townsend City limits and a "special study area" outside the City limits which has the potential to be included in the City's final urban growth area (FUGA). The special study area is comprised of the Glen Cove area on both the east and west sides of Highway 20 south of the City to Old Fort Townsend Road.

Proponent: The City of Port Townsend
540 Water Street
Port Townsend, WA 98368

Lead Agency: City of Port Townsend Building and Community Development Department

Responsible Official: Dave Robison, Director, Building and Community Development Department

FEIS Contact Person: Eric Toews, Planner II (360) 385-3000

Permits and Approvals Required: Recommendation of approval by the Planning Commission; City Council adoption of the Comprehensive Plan goals, policies, implementation strategies, and land use map by Resolution or Ordinance, as appropriate.

Review by the State Department of Community Trade and Economic Development, Growth Management Division.

Date DEIS Issued: January 10, 1996

Date of Public Hearing on the DEIS: January 30, 1996

DEIS Comment Deadline: February 9, 1996

Location of Review Copies of DEIS and Draft Plan Background Materials:

City of Port Townsend
Building and Community Development Department
540 Water Street
Port Townsend, WA 98368

Date FEIS Issued: July 3, 1996

Cost per Copy of DEIS/Draft Comprehensive Plan: \$22.50

Cost per Copy of DEIS/Draft Comprehensive Plan Appendices: \$17.50

Cost per Copy of FEIS: \$15.00

Review Copies Available at Public Libraries:

Port Townsend Public Library
1220 Lawrence Street
Port Townsend, WA

Jefferson County Public Library
620 Cedar Avenue
Port Hadlock, WA

Subsequent SEPA Threshold Determinations: This is a phased environmental review under Chapter 197-11-060(5) WAC. Following adoption of the Comprehensive Plan (*i.e.*, goals, policies, implementation strategies and land use map), detailed regulations to implement the Plan will be developed and additional SEPA environmental review conducted on those regulations. Future SEPA reviews may also be required for project actions which are taken to implement the adopted plan (*i.e.*, construction of capital facilities).

Although this is an integrated SEPA/GMA document, future project level SEPA review may be necessary. The City of Port Townsend retains the authority to impose site specific mitigation measures to address probable significant adverse environmental impacts.

Principal FEIS Authors: City of Port Townsend Staff

III. INTRODUCTION & OBJECTIVES

INTRODUCTION

The Port Townsend Planning Commission has completed its review of the Draft Comprehensive Plan released on January 10, 1996. Public testimony was accepted by the Planning Commission in a series of eight public hearings which concluded on April 24, 1996. Following the close of public testimony, the Planning Commission deliberated upon the testimony received, and formulated findings, conclusions, and recommendations for the advice of the Port Townsend City Council. This recommendation was transmitted to the Council on June 3, 1996.

The Planning Commission's recommendations consist of proposed lines-in and lines-out to the goals, policies and implementation strategies contained in the January 10, 1996 draft, as well as a revised Land Use Map. None of the changes proposed by the Planning Commission would alter the Draft Plan to the point that it no longer falls within the range of Plan Alternatives analyzed within the Draft Environmental Impact Statement (DEIS).

If it is determined prior to final adoption by the City Council that the proposal has been substantially changed so that it is likely to have significant adverse environmental impacts, then a Supplemental Environmental Impact Statement (SEIS) will be prepared pursuant to Chapter 197-11-620 WAC.

THE PROPOSAL'S OBJECTIVES

A requirement of the 1990 Washington State Growth Management Act (GMA), the City's Comprehensive Plan is intended to guide growth and development in Port Townsend over the next 20 years (*i.e.*, 1996 through 2016). In essence, the Plan is a blueprint for how Port Townsend will grow and change over time. As a blueprint for the future, the Plan contains goals, policies, implementation strategies, and a Land Use Map designed to provide a solid basis for land use decision-making.

GMA Planning Goals

The overriding objective of the proposal is to create a consistent policy framework that meets the 13 planning goals established by the State Legislature within the GMA (Chapter 36.70A.020 RCW):

1. **Urban Growth.** *Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.*
2. **Reduce Sprawl.** *Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.*
3. **Transportation.** *Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city plans.*
4. **Housing.** *Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.*
5. **Economic Development.** *Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.*

6. **Property Rights.** *Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.*
7. **Permits.** *Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.*
8. **Natural Resource Industries.** *Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.*
9. **Open Space & Recreation.** *Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource land and water, and develop parks.*
10. **Environment.** *Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.*
11. **Citizen Participation & Coordination.** *Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.*
12. **Public Facilities & Services.** *Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.*
13. **Historic Preservation.** *Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.*

Within the framework established by the GMA and 13 planning goals, the proposal emphasizes four objectives that are central to the community's vision of its future:

Maintaining Port Townsend's Small Town Character

The central objective of the Plan is to maintain and enhance Port Townsend's special character and small town atmosphere. As Port Townsend grows, the very character that attracted residents in the first place is threatened. The Plan contains two very important areas of policy direction designed to preserve the community's essential character while planning for inevitable growth and development.

First, the Plan encourages the development of "mixed use centers" surrounded by strong and diverse neighborhoods, similar to the area surrounding the uptown intersection of Lawrence and Tyler Streets today. These centers are intended to serve as focal points for new or emerging neighborhoods and to help promote pedestrian friendly areas with small scale neighborhood shopping and services.

Second, the Plan includes policies which would lead to the creation of a City-wide interconnected system of open spaces and trails. These green spaces would help to protect the small town atmosphere of Port Townsend while providing other benefits, including stormwater control and linking key wildlife areas.

Achieving a Better Balance Between Jobs & Housing

Another major objective of the Plan is to help address the "jobs/housing imbalance." There are many more people living in Port Townsend than there are good jobs. Because good jobs are hard to find, many Port Townsend residents pay more than they can really afford for housing. The Plan seeks to remedy this imbalance in two important ways.

First, the Plan contains an economic development strategy that is designed to encourage businesses which provide "family wage" jobs - jobs that pay good money, so current and future generations can afford to live and

work in Port Townsend. It seeks to balance economic vitality with environmental protection and preservation of our small town atmosphere.

Second, the Plan contains an affordable housing strategy which provides more land for higher density development, allows more creative housing types, and increases the housing choices available to City residents.

Taken together, the affordable housing and economic development strategies could help to make housing more affordable for Port Townsend residents in the decades to come.

Accommodating Port Townsend's Share of County-Wide Growth

One of the primary purposes of the GMA is to limit sprawling urban density development in rural and resource lands. To accomplish this goal, the GMA makes clear that cities and urban growth areas (UGAs) have a responsibility to accommodate the lion's share of growth, and to do it in a compact, urban manner. By mutual agreement, and based upon recent demographic data, Jefferson County and the City have determined that Port Townsend's share of County-wide growth will be approximately 5,510 people during the next 20 years. This will likely increase the City's total population of 8,366 today to about 13,876 by the year 2016.

Providing Public Facilities & Services Within the City's Financial Resources

Unlike prior plans, the proposed Plan is designed to balance the need for additional public facilities and services with the City's ability to pay for them. In the past, Plans often contained a "wish list" of capital projects with no demonstrated ability to fund the necessary improvements. The proposal represents a distinct departure from past practice - the Plan sets measurable standards for public facilities and services (*i.e.*, level of service standards), states when specific capital projects will be constructed, and identifies the sources of revenue which will be used to fund the necessary improvements.

Policies concerning "concurrency" are also a key component of the Plan. Concurrency is the term used to describe the concept of providing certain facilities and services at or before the time of approval of new development projects. The Plan requires that adequate water, sewer, stormwater and transportation facilities be in place before new development can be approved.

IV. A DESCRIPTION OF THE DEIS ALTERNATIVES

NO ACTION - Existing Plans & Regulations

This alternative is required as the "baseline" for comparing other alternatives under SEPA. Under the No Action Alternative, the population growth rate could vary substantially, from 1.8% to 4.0% annually.

Under this alternative, future growth would take place according to existing plans and regulations. As such, the Comprehensive Plan, adopted in 1981, would continue to guide the town's development. The description provided for Alternative #1, below, is similar to this alternative, except that existing regulations, including the zoning code, would not be revised or updated under the No Action Alternative to meet the requirements of the GMA (*e.g.*, concurrency, affordable housing, etc.). Similarly, the No Action Alternative does not outline a process for funding public services and capital facilities over the 20 year planning period as required by the GMA.

Under the No Action Alternative, future development within the Glen Cove area and other areas immediately adjacent to the City of Port Townsend would continue to be regulated by existing Jefferson County plans and regulations (*i.e.*, the 1979 Jefferson County Comprehensive Plan, 1988 Highway 20 Corridor Policies, and the 1994 Jefferson County Zoning Code). The limits of the Port Townsend UGA would not be extended beyond the existing City limits under this option. Consequently, provision of services within the Glen Cove area would be fragmented between property owners, Jefferson County Public Utility District #1, and Jefferson County. The implications of this alternative for growth and development in the Glen Cove area can be summarized as follows:

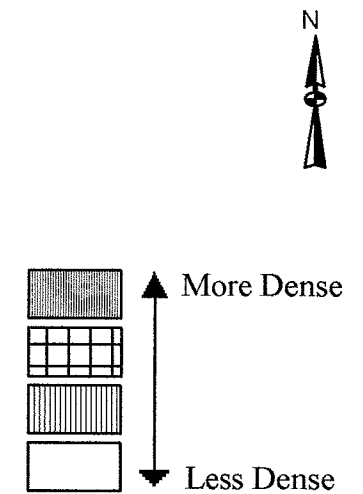
- ☐ Port Townsend City limits serves as FUGA boundary;
- ☐ Existing County Plan and Zoning designations remain unchanged - County retains permitting authority;
- ☐ Present level of service continues;
- ☐ Fragmented water service (*i.e.*, combination of individual wells and PUD water)¹;
- ☐ Inadequate fire flows;
- ☐ Difficulty in obtaining water taps;
- ☐ On-site wastewater disposal;
- ☐ No transportation network improvements planned;
- ☐ Lack of necessary infrastructure inhibits commercial and manufacturing development;
- ☐ Zoning designations do not accurately reflect the type of development which can be supported - assessed valuations bear no relation to actual development potential; and
- ☐ Eastern Jefferson County's economic and employment growth is severely constrained - current imbalance between jobs and housing is reinforced.

If adopted, the No Action Alternative would clearly not comply with the GMA, and would expose the City of Port Townsend and Jefferson County to sanctions imposed by the State. Figure #1 on page 8 graphically illustrates the building intensities which may occur at the end of the 20 year planning period if the No Action Alternative is implemented.

¹ The Coordinated Water System Plan process (CWSP) may result in changes to current water service area boundaries and responsibilities.

City of Port Townsend

FIGURE 1
No Action Alternative -
Existing Plans & Regulations



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Field verification of the accuracy of any information contained in this map is the sole responsibility of the user. Parcel information was obtained from the Jefferson County Assessor's office. Parcel lines are based on available public records and existing map sources, not from field surveys. Parcel lines have been adjusted to better fit planimetric data. This map may contain inaccuracies and should not be relied upon for site-specific analysis, property acquisition, determination of actual rights of way, property dimensions or land area. No representation of warranty regarding the positional accuracy of any map feature is either expressed or implied by publication of this map. By accepting this map, the user releases the City of Port Townsend from any and all direct or indirect liability for actions or decisions made based on information contained in this map.

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No Action Alternative - Existing Plans & Alternatives

ALTERNATIVE #1 - Residential Community (Dispersed Growth)

This alternative uses the No Action Alternative as a baseline, but anticipates the adoption and implementation of planning and development regulations to meet the "minimum requirements" of the GMA. The approach anticipates that Port Townsend's population will grow about 2% each year, for a population increase of 3,858, and a population total of 11,798 by the year 2014.

To meet the requirements of the GMA, this alternative assumes that existing land use policies and regulations would be amended to address concurrency, capital facilities planning and funding, affordable housing, and retention of some open spaces. Within the City limits, existing zoning would stay much the same, with the exception that more multi-family (R-II and R-III) zones would be added to encourage the provision of affordable housing.

As is the case today, growth would drive the planning and development process, allowing this option to be described as more "reactive" than "proactive." Thus, the private sector would continue to direct the timing and location of growth and development. The preservation and enhancement of the community's present character would be the responsibility of individuals, not government, and land use planning decisions would be made on a "case-by-case" basis.

Because this alternative relies largely upon the goals and policies and land use designations contained in the present Port Townsend Comprehensive Plan, specific areas of the City would not be targeted and zoned for infill or the provision of public services. Over time, the development pattern would tend to be more dispersed, leading to greater cumulative impacts, including the loss of open spaces and natural features. Impacts would be dealt with at a project level, instead of using a systematic City-wide approach. Widely distributed development of over 1,787 existing lots (*i.e.*, the estimated number of new dwellings constructed under this option) would affect the "small town" character of the City and result in sprawl. However, many of the unique characteristics possessed by the Port Townsend today, are the result of this type of disjointed and incremental growth. Enterprising individuals would still find opportunities to contribute to the City's distinctive character, as is true today.

The City would remain predominantly residential. This would reinforce the current trend towards accommodating a higher proportion of retirees within the City's total population (depending upon regional economic conditions). Despite this characteristic, the expansion or creation of some new multi-family zones would encourage a wider diversity of housing types and prices than is the case today.

The Residential Community Alternative would not expand the City's existing commercial and industrial zoning districts. The economy would tend to rely more heavily upon cottage based industries, home based businesses, and an enhanced tourism industry. Port Townsend would probably still remain a major center of eastern Jefferson County's economy and employment, but other nearby communities, like the Tri-Area, would accept a larger share of the area's commercial and industrial growth. On balance, the goals and policies of the Residential Community Alternative would direct few changes, reflecting the opinion shared by many Port Townsend residents that things are "pretty good the way they are."

In summary, the major characteristics of this alternative for areas within the City limits include:

- ☐ Allowing individuals to direct the timing and location of development and growth;
- ☐ Identifying and conserving open spaces and natural features on a "case by case" basis;
- ☐ Leaving the existing zoning districts largely unchanged, with the exception of the creation or expansion of multi-family zones to promote affordable housing;
- ☐ Reinforcing the residential character of the City, with the anticipated result that retirees would become a more dominant segment of the local population;

- Increasing the role of small scale home based businesses and cottage based industries in the local economy, instead of creating new commercial and industrial opportunities; and
- Few revisions to existing plans and regulations in order to comply with the minimum requirements of the GMA.

The Residential Community Alternative is also linked to a "Rural Commercial/Manufacturing" alternative for the unincorporated Glen Cove area. Like the No Action Alternative, the boundary of the Port Townsend UGA would not be extended beyond the City's current limits. However, limited portions of the SR 20 Corridor area would be designated as a Rural Commercial and Light Manufacturing area. The option anticipates that the County would undertake significant amendments to the Jefferson County Comprehensive Plan and Zoning Ordinance to promote rural scale and intensity commercial and manufacturing uses in Glen Cove, and to ensure that such development does not require extensions of urban public facilities or services. The County would rezone the Port Townsend Paper Mill for "resource-related" manufacturing under this option, and it would remain outside the City's UGA. The implications of this alternative for growth and development in the Glen Cove area can be summarized as follows:

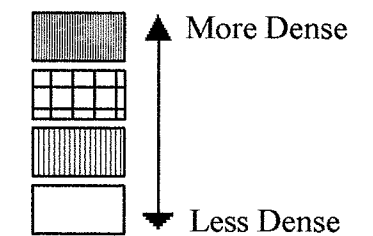
- Port Townsend City limits serves as FUGA boundary;
- All existing manufacturing and commercial (*i.e.*, M/C) designations in the affected area are changed to rural commercial and rural light manufacturing with significant limitations on the types of uses allowed, densities, and sizes;
- The Port Townsend Paper Mill site, currently zoned for heavy manufacturing (M-1), is rezoned by the County for "resource-related" manufacturing;
- Some existing commercial and manufacturing uses which are not "rural" in character become "legal nonconforming";
- Water, wastewater, and transportation facilities meet a "rural commercial/manufacturing" level of service²;
- On-site wastewater disposal and limited water availability restricts allowable uses and development intensity;
- Limited growth and development potential requires few transportation network improvements;
- On-site stormwater control;
- Limits the spread of urban commercial and manufacturing growth in rural areas and promotes small scale rural commercial and manufacturing uses;
- Does not require extensions of urban governmental facilities and services into rural areas;
- County retains permitting authority;
- Provides limited opportunities for new development and economic and employment growth; and
- Does not measurably improve the current imbalance between jobs and housing.

Figure #2 on page 11 graphically illustrates the building intensities which may occur at the end of the twenty year planning period if Alternative #1 is implemented.

² The Coordinated Water System Plan process (CWSP) may result in changes to current water service area boundaries and responsibilities.

City of Port Townsend

FIGURE 2
Alternative #1 - Residential
Community (Dispersed Growth)



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Field verification of the accuracy of any information contained in this map is the sole responsibility of the user. Parcel information was obtained from the Jefferson County Assessor's office. Parcel lines are based on available public records and existing map sources, not from field survey's. Parcel lines have been adjusted to better fit planimetric data. This map may contain inaccuracies and should not be relied upon for site-specific analysis, property acquisition, determination of actual rights of way, property dimensions or land area. No representation of warranty regarding the positional accuracy of any map feature is either expressed or implied by publication of this map. By accepting this map, the user releases the City of Port Townsend from any and all direct or indirect liability for actions or decisions made based on information contained in this map.

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Alternative #1 - Residential Community (Dispersed Growth)

ALTERNATIVE #2 - Community Neighborhoods (Focussed Growth)

This alternative seeks to maintain the City's "small town atmosphere" while absorbing population growth at an annual rate of 2.5%. The approach is designed to accommodate a population increase of 5,073, and a population total of 13,013 by the year 2014.

This alternative promotes a "pedestrian scale" city by establishing mixed use centers surrounded by strong neighborhoods. Under the "focussed growth" option, the City would be divided into different subareas. In subareas where adequate transportation routes and other public services (*e.g.*, sewer and water) already exist, specific intersection areas would be targeted for the development of mixed use centers. Higher density residential development would be allowed in and around these centers, along with retail and service oriented businesses which serve the needs of residents in the immediate vicinity. Some portions of the Winona and Western subareas would be designated for lower density development, and the extension of public services to these areas would be discouraged. (*Note:* Due to the topography and stormwater control problems, these areas are not as well suited to intensive development, and would be more expensive to serve with public infrastructure).

The new mixed use centers would provide for slightly enhanced commercial employment opportunities within the City limits, while at the same time promoting the development of compact and livable neighborhood communities. Higher density residential zoning in these areas would promote a wider variety of housing types and prices to serve a diversity of lifestyles and incomes. A significant proportion of the anticipated 2,251 additional households under this option would locate in and around the mixed use centers. A major purpose of this growth scenario is to encourage smaller scale, self-sustaining uses near where people live and play.

The Community Neighborhoods Alternative ensures that many residents would be only a bike ride or walk away from convenience shopping and services, thus reducing reliance upon the automobile (*e.g.*, much like Uptown Port Townsend today). Establishing new neighborhoods surrounding the mixed use centers would allow the City to retain its essentially residential character, yet promote a variety of housing types and land uses.

The intersections of major transportation links, would be the most promising locations for these mixed use centers. Possible areas to consider include San Juan/F Street, and Howard Street/Hastings Avenue. The centers would be compact and relatively small compared to the Downtown or the Uptown commercial districts, and would be designed to serve the needs of the surrounding neighborhoods.

By encouraging infill and higher density residential development in portions of the City that can support it, the "focussed growth" option would lessen the potential for sprawling development, and save public money which would otherwise be expended on the expansion of public services and facilities. This alternative would promote the creation of a City-wide system of interconnected parks, open spaces and trails (including important wildlife habitat). Thus, the community's open spaces could be identified and conserved systematically, rather than on a case-by-case basis.

The Community Neighborhoods Alternative is also linked to an expanded Community-Serving FUGA Alternative for the unincorporated Glen Cove area. The goal is to create a moderately expanded FUGA which is provided with adequate urban public facilities and services. The FUGA boundary would largely follow the existing light manufacturing and commercial (M/C) zoning boundary in the Glen Cove area, encompassing approximately 600 acres of unincorporated Jefferson County. Like Alternative #1, the Port Townsend Paper Mill would remain outside the FUGA boundary as a resource-related industry under the GMA.

This FUGA expansion would not be aimed at dramatically altering the present character of the North Quimper Peninsula. Instead, its objective is to support current commercial and manufacturing enterprises in the Glen

Cove area, and provide expanded opportunities for retailing and appropriate manufacturing, consistent with the broader community vision. Larger scale chain retailers would be limited to one or two sites, and most of the unincorporated portion of the FUGA would be devoted to small scale manufacturing and medium scale locally owned retail and service sector businesses. The implications of this alternative for growth and development in the Glen Cove area can be summarized as follows:

- Port Townsend FUGA is expanded to include the light manufacturing and commercial (M/C) zone adjacent and south of the City;
- Existing heavy manufacturing zone (M-1) at the Port Townsend Paper Mill is changed to resource-related manufacturing, with some limitations on change of use;
- Fewer existing establishments within the unincorporated portion of the FUGA become legal nonconforming, retaining more flexibility for business owners;
- Most areas within the unincorporated portion of the FUGA are zoned for community commercial (C-II) and light manufacturing/commercial (M/C) uses;
- A relatively small area is zoned for county-wide or "regional" retail (C-IV) use;
- Land uses and bulk and dimensional requirements for the new zoning districts are tailored to ensure an appropriate mix and sizing of new development;
- Water, wastewater, and transportation facilities are upgraded to an "urban" level of service³;
- Potential for certain light manufacturing uses could necessitate expensive wastewater treatment facility expansions;
- Significant and costly transportation network improvements are needed to accommodate traffic volumes to and within the commercial areas of the unincorporated portion of the FUGA;
- City and County establish interlocal agreements for joint review of development permits and tax revenue sharing;
- City and County adopt mirror image goals, policies, and implementing regulations for the unincorporated portion of the FUGA;
- Limits the spread of commercial and manufacturing development in rural areas;
- Provides adequate urban level infrastructure to promote commercial and manufacturing uses in the unincorporated portion of the FUGA;
- Provides adequate land and infrastructure to promote opportunities for significant economic development and employment growth - could help to remedy the jobs/housing imbalance; and
- More tax revenues could be generated for both the City and County if allowed uses are carefully specified (*i.e.*, target and attract uses that pay their own way).

Overall, the establishment of businesses in the mixed use centers and expanded FUGA would not diminish the importance of existing commercial areas in the Sims Way/Water Street core. These areas would still be devoted to visitor serving uses, as well as a broad range of community commercial uses. Despite modest increases in the amount of land zoned for commercial use within the City, the "focussed growth" alternative would not create many employment opportunities within the City's corporate limits. However, expansion of the Port Townsend FUGA, coupled with the extension of urban infrastructure (*i.e.*, water and sewer) into the Glen Cove area, could promote significant employment growth over the 20 year planning horizon.

In sum, this Focussed Growth Alternative would promote the small town atmosphere valued by many residents, by facilitating the creation of safe and secure neighborhood communities. Expansion of the Port Townsend FUGA, coupled with the extension of adequate urban infrastructure into Glen Cove would also foster economic growth and employment opportunities. The major features of this alternative include:

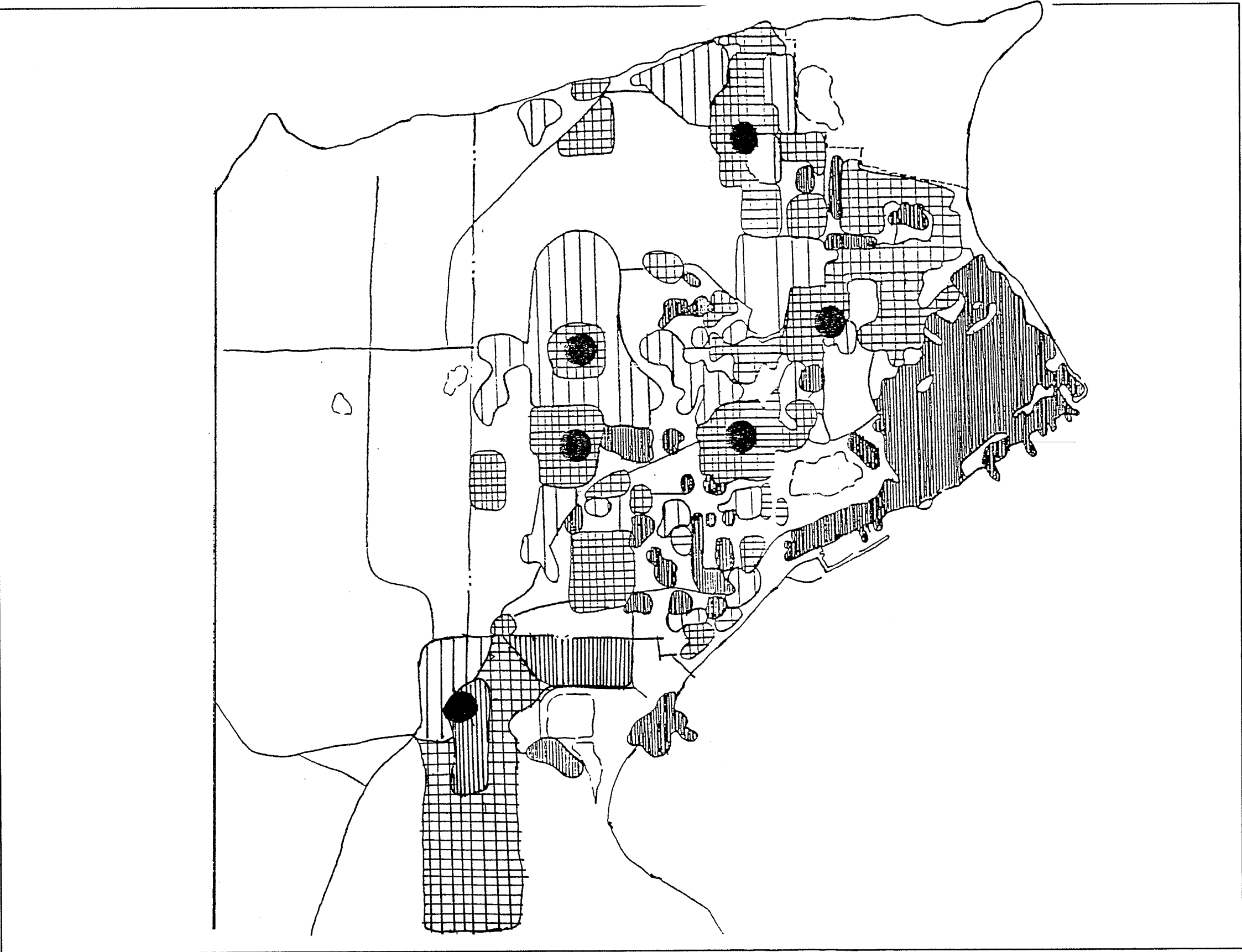
³ The Coordinated Water System Plan process (CWSP) may result in changes to current water service area boundaries and responsibilities.

- Separating neighborhoods by open space corridors and/or public facilities;
- Providing commercial opportunities within neighborhoods;
- Increasing commercial development concentrations in areas adjacent to SR 20 and existing and future arterials;
- Improving transportation links between the neighborhoods and mixed use centers;
- Allowing higher density residential development adjacent to the areas with good traffic circulation, such as Kearney Street (*i.e.*, north of the Flats District) and adjacent to the Upper Commercial District and Howard Street commercial areas;
- Designating areas in the Winona and Western subareas of the City for lower density residential development with agricultural uses;
- Increasing pedestrian opportunities throughout the City, particularly for residents in and adjacent to the mixed use centers and higher density residential areas;
- Expanding the Port Townsend FUGA to include portions of the Glen Cove area currently zoned by the County for light manufacturing and commercial uses;
- Extending urban infrastructure into the unincorporated portion of the FUGA to promote economic development and employment growth; and
- Zoning areas within the unincorporated portion of the FUGA for an appropriate mix of light manufacturing, community-serving retail and service businesses, and a limited amount of larger scale or "regional" retail uses.

Figure #3 on page 15 graphically shows potential building intensities which may occur at the end of the twenty year planning period if Alternative #2 is implemented.

City of Port Townsend

FIGURE 3
Alternative #2 - Community
Neighborhoods (Focussed Growth)



- More Dense
-
- Less Dense
- Neighborhood Center

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Field verification of the accuracy of any information contained in this map is the sole responsibility of the user. Parcel information was obtained from the Jefferson County Assessor's office. Parcel lines are based on available public records and existing map sources, not from field survey's. Parcel lines have been adjusted to better fit planimetric data. This map may contain inaccuracies and should not be relied upon for site-specific analysis, property acquisition, determination of actual rights of way, property dimensions or land area. No representation of warranty regarding the positional accuracy of any map feature is either expressed or implied by publication of this map. By accepting this map, the user releases the City of Port Townsend from any and all direct or indirect liability for actions or decisions made based on information contained in this map.

City of Port Townsend

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Alternative #2 - Community
Neighborhoods (Focussed Growth)

ALTERNATIVE #3 - Urban Community (Concentrated Economic Development)

The objective of this alternative is to capitalize upon Port Townsend's natural position to become the County's commercial, manufacturing, and cultural center. The anticipated growth rate under this scenario is 4.0%, reflecting substantial growth in both population and employment base. The population would increase by 9,914 residents to a total population of 17,854 by the year 2014. The ultimate goal of this alternative is to provide one job per employable resident, achieving a balance between jobs and housing. This alternative would reduce the amount of "commercial leakage" to places such as Silverdale and Sequim, as more people choose to live, work, and shop in Port Townsend. The increased opportunities to find meaningful employment in the City would also promote the affordability of housing, goods, and services.

Over the 20 year planning period, this alternative would change Port Townsend's character, attracting a broad diversity of newcomers. Population growth (*i.e.*, approximately 4,273 new households) would be encouraged in areas in close proximity to job centers and transportation facilities, for example: the Historic Downtown; the Flats District; the Upper Commercial District; and commercial and industrial areas in Glen Cove. Housing densities necessary to support the desired transportation centers and employment areas would be encouraged. The growth of the City's tax base would allow significant improvements to the transportation system, improving access to services and the movement of goods.

Growth in the City's employment and tax base could also fund a range of community projects, including providing more parks, sidewalks, better streets and public art. While Port Townsend's "small town" character would diminish under this alternative, open spaces could be acquired, offering opportunities for retreat from the City's more urban paced lifestyle.

The Urban Community Alternative has been linked to a County-Wide Retail and Manufacturing Center Alternative for the unincorporated Glen Cove area. Old Fort Townsend Road would serve as the southern boundary of the FUGA, and all areas to the east of SR 20 (*i.e.*, including the Port Townsend Paper Mill) would be included within the FUGA. Approximately 900 acres of unincorporated Jefferson County would fall within the unincorporated portion of the FUGA. Opportunities for significantly expanded auto-oriented retail sales, and some limited opportunities for larger scale manufacturing uses which are not water intensive (*e.g.*, food processing) would be provided. Larger scale retailers (*e.g.*, Wal Mart, Ernst, Price Costco, Long's Drugs, etc.) could be the backbone of this intensively developed FUGA. In contrast to Alternative #2, large scale chain retailers would be more dominant, with a smaller proportion of the unincorporated FUGA devoted to small and medium scale locally owned businesses. Some larger scale "clean" manufacturing would be permitted within the unincorporated FUGA, set back from the highway. The Port Townsend Paper Mill would remain zoned for heavy industrial use, while areas to the east of the highway corridor and south of the Mill could be zoned for higher density residential use. The implications of this alternative for growth and development in the Glen Cove area can be summarized as follows:

- ☐ Port Townsend FUGA boundary is expanded to encompass these unincorporated areas:
 - Light manufacturing and commercial (M/C) zone adjacent and south of the City;
 - Heavy industrial (M-1) zone south of the City (*i.e.*, Port Townsend Paper Mill);
 - Hawkeye Mobile Home Park south of the City on the west side of SR 20; and
 - General use zone north of Old Fort Townsend State Park and east of SR 20;
- ☐ Significant areas on the east side of SR 20 are zoned for larger scale county-wide or "regional" retail uses;
- ☐ Limited areas are reserved for larger scale manufacturing (*i.e.*, areas removed from highway frontage);
- ☐ Land uses and bulk and dimensional requirements for the new zoning districts are tailored to ensure an appropriate mix and sizing of new development;

- ☐ Water, wastewater, and transportation facilities are upgraded to an urban level of service⁴;
- ☐ Expanded manufacturing and residential areas could require improvements to water and wastewater systems which are significantly more expensive than Alternative #2;
- ☐ Major transportation network improvements are needed to accommodate heavy traffic volumes to and within the county-wide retail areas of the unincorporated FUGA (*e.g.*, frontage roads, highway widening, controlled intersections, etc.);
- ☐ Significant stormwater control facilities necessary due to high percentage of impervious surfaces;
- ☐ City and County establish interlocal agreements for joint review of development permits and tax revenue sharing;
- ☐ City and County adopt mirror image goals, policies, and implementing regulations for the unincorporated portion of the FUGA;
- ☐ Limits the spread of urban commercial and industrial growth in rural areas - does not require extensions of urban governmental facilities and services into rural areas;
- ☐ Provides adequate urban level infrastructure to promote large scale retail commercial and medium sized manufacturing uses not currently found in the area;
- ☐ Provides adequate land and infrastructure to promote opportunities for significant economic development and employment growth;
- ☐ Could remedy the jobs/housing imbalance;
- ☐ Could be a significant generator of tax revenues for both the County and City;
- ☐ Will likely require more costly public improvements than any of the other alternatives; and
- ☐ Larger and more intensively developed FUGA may significantly alter the existing community character.

Under the Urban Community Alternative, local government would actively promote the City's economic development assets. In cooperation with the private sector, local government would respond quickly and efficiently to provide innovative leadership, ensuring Port Townsend's continued economic health and diversity. Over time, growth in the City's employment and tax base could also be used to fund infrastructure improvements necessary to attract a quality college to Port Townsend. In summary, the major characteristics of this alternative include:

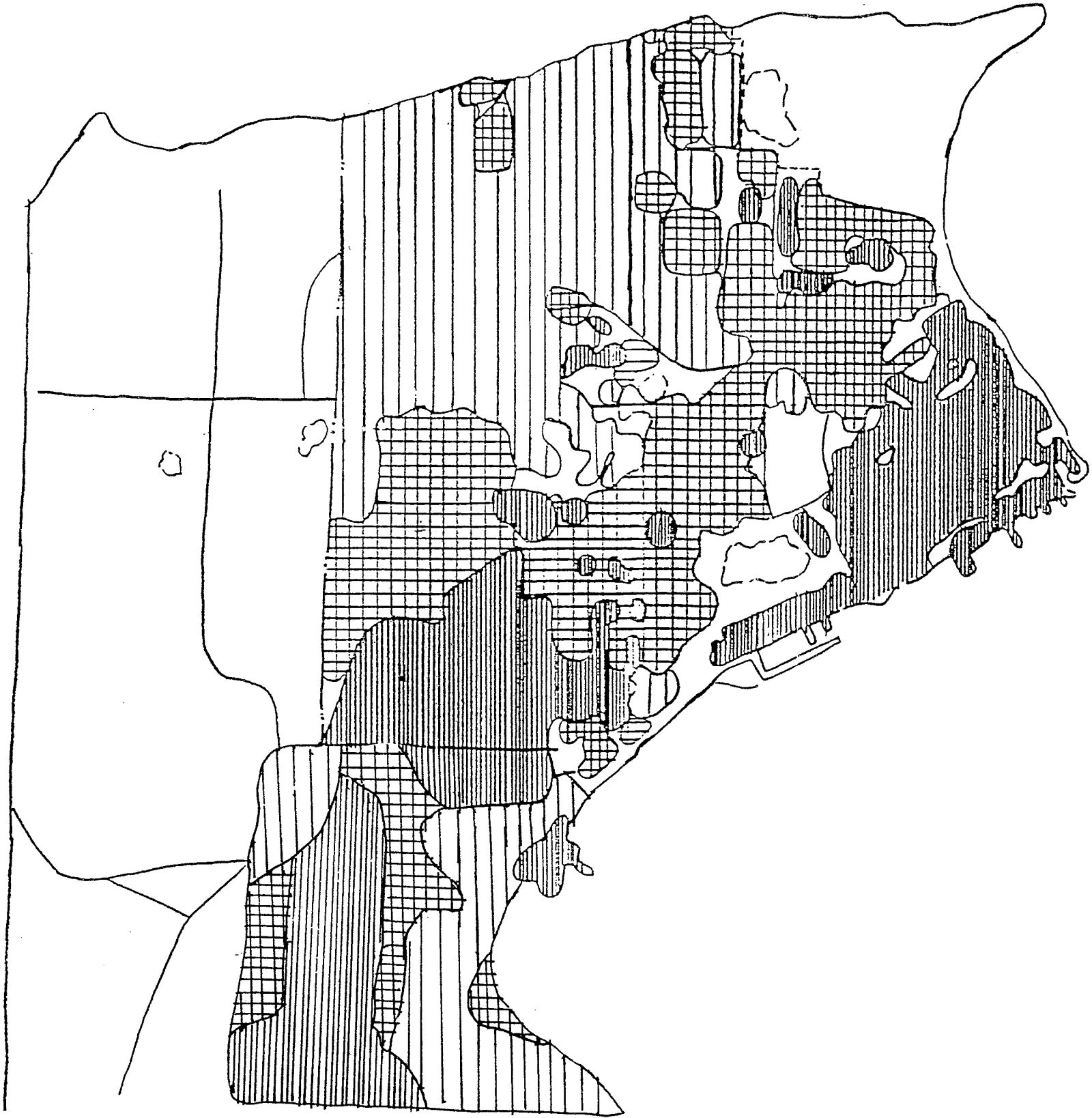
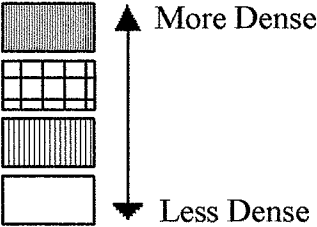
- ☐ Designating a FUGA significantly larger than the present City limits to provide additional land for commercial and industrial development;
- ☐ Increasing commercial and industrial development concentrations in the City's east/west core, particularly in areas adjacent to SR 20 and Sims Way, Port owned properties, the Port Townsend Business Park and areas adjacent to the City's present incorporated limits;
- ☐ Expanding new public infrastructure in proximity to new commercial and industrial zones;
- ☐ Providing for higher density residential development in areas surrounding employment centers;
- ☐ Increased transit service for residents of higher density residential areas surrounding commercial and employment areas; and
- ☐ Securing Port Townsend's position as the cultural and economic center of the entire Olympic Peninsula.

Figure #4 on page 18 shows potential building intensities which may occur at the end of the twenty year planning period if Alternative #3 is implemented.

⁴ The Coordinated Water System Plan process (CWSP) may result in changes to current water service area boundaries and responsibilities.

City of Port Townsend

FIGURE 4
Alternative #3 - Urban Community
(Concentrated Economic Growth)



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Alternative #3 - Urban Community
(Concentrated Economic Growth)

V. A SUMMARY OF IMPACTS, POTENTIAL MITIGATION MEASURES, & UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

SUMMARY OF IMPACTS

The Natural Environment

Earth Resources

Alternative #3, Urban Community, provides for the highest level of urbanization within Port Townsend and the unincorporated Glen Cove area, and would likely have the most significant impact upon earth resources, both in the City and in Glen Cove. Alternative #2, Community Neighborhoods, would have the second most significant impact upon earth resources. Alternative #1, Residential Community, while assuming lower population growth than either Alternatives #1 or #2, promotes incremental and dispersed development within the City limits which could cumulatively lead to impacts very similar to Alternative #2. The No Action Alternative could also lead to impacts to earth resources which are similar to Alternatives #1 and #2. Under all of the alternatives, areas that do not meet the definition of ESAs under the City's regulations have the potential to be highly modified. The main impacts to earth resources will be due to earth movement during construction in locations outside of ESAs (*e.g.*, topographic changes, grading, earth removal, earth exportation, road construction).

Within the unincorporated areas of Jefferson County, alternatives that assume a higher population "capture" rate for areas outside Port Townsend (*i.e.*, the No Action Alternative and Alternative #1) may result in greater impacts to earth resources due to increased construction. These impacts could occur within the County's unincorporated urban growth areas (*i.e.*, Port Ludlow and the Tri-Area) or widely dispersed in rural areas.

Air Quality & Odor

Alternative #3 will result in more manufacturing/industrial uses locating in Port Townsend and the unincorporated portion of the FUGA. This will likely result in a greater amount of industrial-related pollutants emitted in the Planning Area than under the other three alternatives.

Emissions from business and commercial uses (*e.g.*, dry cleaners, gas stations, and restaurants) will likely be greatest under Alternatives #2 and #3, which provide for more of these uses, both within the City and in the unincorporated portions of the FUGA. Further, the greater population under Alternative #3 will demand more commercial services than any of the other alternatives.

Alternatives #2 and #3, which include the largest populations and mixture of uses, will likely increase the potential for nuisance odor complaints over the No Action Alternative and Alternative #1. As mixed uses become more prevalent, more people are exposed to odors from adjacent uses, both at work and at home. The No Action Alternative and Alternative #1 have the most dispersed work and residential populations, resulting in more dispersion of odors with fewer people exposed to any specific odor.

Outside the limits of the Port Townsend UGA, Alternative #3 would likely cause the greatest impacts to local and regional air quality, due to rapid population and employment growth. Alternative #2 could possibly result in the fewest overall impacts to local and regional air quality. Concentrated residential and commercial development located in several "mixed use centers" could foster the development of more pedestrian oriented neighborhoods which are linked by trails and means of public transportation, as well as roads which serve the automobile. Also, because this alternative is designed to accommodate significant population and employment growth, it would likely reduce pressure to convert and develop adjacent rural areas of Jefferson County. The No

Action Alternative and Alternative #1 promote a dispersed single-family residential development pattern which could result in more dispersed air pollution and perhaps greater emissions overall (*i.e.*, due to the increased number of vehicle trips) than Alternative #2.

Surface Water

Alternatives #2 and #3 will result in the highest amount of impervious surfaces and stormwater runoff within the Port Townsend Planning Area and the adjacent Glen Cove area. The No Action Alternative and Alternative #1 will have less impact than Alternatives #2 or #3. While the impervious surface area and total runoff under the No Action Alternative and Alternative #1 would be less, the dispersed development patterns promoted by these alternatives make systematic mitigation of these impacts considerably more difficult than under the more concentrated growth patterns promoted by Alternatives #2 and #3.

Because the No Action Alternative does not involve any long-range planning for growth, and Alternative #1 plans for a level of growth that is below what is likely to occur, these two alternatives would likely result in the greatest sprawl in adjacent rural areas of Jefferson County. Rural sprawl under these Alternatives could result in more impervious surface area outside the Port Townsend UGA, a greater increase in peak discharge flows in streams, and a greater potential for erosion. These Alternatives also have the potential to adversely impact water quality in surface waters outside the Port Townsend UGA, due to sedimentation from construction activities, eventual failure of septic systems, and more pollutants associated with residential use (*e.g.*, fertilizers, pesticides, etc.). Alternatives #2 and #3, which are designed to accommodate and provide infrastructure for larger populations would likely result in the least growth and development in adjacent rural areas of Jefferson County, and therefore, the least impacts to surface waters outside the Port Townsend UGA.

Groundwater

Alternative #3 would have the greatest impact to groundwater resources. This alternative has been associated with the highest population growth, the most intense commercial and industrial development, the most impervious surface area, and the greatest risk of accidental spills of hazardous substances.

Alternative #2 could result in the second highest impact to groundwater resources. The impacts of Alternative #1 would be very similar to Alternative #2. Although Alternative #2 assumes considerably more population growth than Alternative #1, the more concentrated development pattern promoted by this option would, relative to its population total, pose fewer impacts than Alternative #1 (*i.e.*, "mixed use center" development which accommodates residential and commercial space in multi-story structures creates less impervious surface than the same amount of development under a "dispersed" land use pattern).

Outside the Port Townsend UGA, those alternatives which anticipate a greater population capture rate for unincorporated Jefferson County (*i.e.*, the No Action Alternative and Alternative #1) could result in greater impacts to groundwater resources. These alternatives allow for a larger proportion of growth to occur in rural areas that are not served by sanitary sewer systems. If not properly regulated and managed, this rural growth could result in contamination of groundwater resources.

Floods

Alternative #3 is likely to have the greatest impact in terms of potential flooding. The increased population growth under this alternative could lead to more impervious surface area than the other alternatives, as well as increased runoff during storm events. Alternative #2 would likely have impacts similar to, but somewhat less than, Alternative #3. Despite the increased stormwater runoff projected under these alternatives, the

development patterns under these options tend to discourage growth and development in areas which have flood-related hazards, and concentrate growth in areas with fewer limitations to development.

The No Action Alternative and Alternative #1 would continue the dispersed residential development patterns of today. Ultimately, these patterns could lead to cumulative stormwater runoff problems causing flooding in certain areas of the City.

Within the unincorporated areas of Jefferson County, it is likely that the No Action Alternative and Alternative #1 would lead to greater impacts than either Alternative #2 or #3. The slower, and more dispersed growth within the City that is likely under the No Action Alternative and Alternative #1, would also probably result in a higher rate of population "capture" for unincorporated areas. This increased growth and associated development in unincorporated areas would lead to additional impervious surface area which could result in cumulative impacts which increase the likelihood of flooding. In contrast, Alternatives #2 and #3 anticipate a higher rate of growth for Port Townsend, likely reducing growth pressures in rural areas and reducing the likelihood of flooding in such areas.

Plants & Animal Habitat

Alternative #3, which assumes the highest growth rate and population total, would also promote the most residential, commercial, and industrial development. Consequently, existing vegetation and wildlife habitat would be reduced to the greatest extent under this alternative. However, this alternative anticipates the acquisition of some open spaces which could serve as habitat, although a City-wide open space and wildlife corridor system is not assured.

The No Action Alternative and Alternative #1 would result in significant impacts to plant and animal habitat. While assuming lower growth rates, these alternatives also promote widely dispersed development patterns which could lead to increased fragmentation and isolation of habitat areas. Additionally, these alternatives do not provide for the creation of a City-wide open space network which could preserve habitats and provide wildlife connecting corridors to unincorporated Jefferson County. The cumulative impacts of these alternatives would be second only to the "concentrated economic growth" scenario envisioned under Alternative #3.

Alternative #2 would pose the least impact to native plant and animal habitats. This alternative promotes more concentrated development in and around "mixed use centers" with lower development densities prevailing in those portions of the Planning Area which have the highest concentration of plant and animal habitat. This focussed growth alternative provides for the systematic identification and conservation of open spaces and would promote a City-wide system of interconnected parks, open spaces, trails and important wildlife habitat corridors.

The impacts to native plant and animal life and habitat located outside the Port Townsend UGA would be different from one alternative to another, depending on the extent of growth permitted in presently "semi-rural" and rural unincorporated areas, and the regulations adopted by Jefferson County. Alternatives #2 and #3, which would promote more urban development concentrations in Port Townsend, could reduce the pressure to convert and develop surrounding rural areas, particularly on the Quimper Peninsula. By contrast, the No Action Alternative and Alternative #1 assume a continuation of Port Townsend's historical development patterns (*i.e.*, relatively low density, widely dispersed growth). Over time, these alternatives could lead to greater impacts upon fish and wildlife habitat areas on unincorporated areas of the Quimper Peninsula than the other alternatives.

Energy

Electrical power, propane and petroleum have historically all been provided in response to demand. All of the alternatives assume that growth and development will occur during the 20 year planning period, and that demand for sources of energy will increase. However, there may be differences between the alternatives with respect to impacts on sources of energy, especially electrical power.

Transmission and substation facilities may need to be modified to reflect changes in the location and intensity of growth, particularly under Alternatives #2 and #3 which assume annual growth rates of 2.5% and 4%, respectively. More of these facilities would be required in the Port Townsend Planning Area under these alternatives than under the No Action Alternative and Alternative #1.

The Built Environment

Environmental Health

Noise: Alternative #2, which promotes density concentrations in select areas of town may result in the lowest overall levels of noise generation because average commuting distances will be reduced and more intensive use of public transportation and nonmotorized transportation links will reduce the number of automobile trips. However, the increased residential densities in and around the mixed use centers, coupled with ground floor commercial uses in these areas could expose residents to higher noise levels than the more dispersed development patterns of the No Action Alternative and Alternative #1.

The dispersed development patterns promoted by the No Action Alternative and Alternative #1 would likely generate more total noise both within the City, and County-wide than Alternative #2, but somewhat less than Alternative #3. Because the No Action Alternative and Alternative #1 assume lower rates of population "capture" for the City, more rural development is likely to occur under these options. As people commute longer distances, rural and City-wide noise levels could be measurably increased.

The urban development patterns promoted under Alternative #3 would likely lead to noise impacts which are greater than any of the other alternatives. In addition to increased residential densities in areas near places of employment, the increased levels of commercial and manufacturing development promoted under this option could generate significant noise impacts over wide areas of the community.

Light & Glare: Alternatives #2 and #3 will result in higher overall levels of light and glare impacts than Alternative #1. However, these impacts are likely to be more limited in geographic area under Alternatives #2 and #3 than under Alternative #1. Alternative #1, which perpetuates the existing pattern of widely dispersed residential development would likely expose more City residents to light and glare impacts than either of the more concentrated development options, as vegetative cover is removed to make way for new residential development over wide areas of town.

The lower population levels associated with the No Action Alternative and Alternative #1 would probably result in higher rates of population capture for unincorporated areas of Jefferson County. Because these alternatives would create the greatest pressure for residential development outside the City, these alternatives are likely to have the greatest light and glare impacts County-wide.

Land & Shoreline Use

Residential Areas: Under the No Action Alternative, existing neighborhoods can expect modest amounts of infill development on vacant or under-used lots. Since existing regulations allow accessory dwelling units (*i.e.*, ADUs), a moderate amount of this type of development could be expected within established neighborhoods. Larger vacant parcels of land would be subdivided and developed, for the most part, with single-family dwellings.

Under Alternative #1, current zoning within City neighborhoods would remain largely unchanged. While the zoning would not change dramatically under this option, substantial population increases under this alternative could result in significant cumulative impacts to the existing "small town" character of the City. Over time, many undesignated open space areas that contribute to the pastoral quality of portions of town would be converted to moderate density single-family development. While the predominantly single-family character of the City would remain, a limited amount of land would be rezoned for higher density multi-family development under this option (*i.e.*, an area of 40 acres or less).

Under Alternative #2, existing neighborhoods can expect more infill development than under either the No Action Alternative or Alternative #1. Over time, regulatory changes that allow attached single-family dwellings (*i.e.*, duplexes, triplexes, and fourplexes) could affect the visual character of existing neighborhoods. Under this option, at least 125 acres of vacant land would be zoned for moderate and higher density multi-family use. Within the unincorporated portion of the Port Townsend UGA, about 218 acres of land would be zoned for residential uses.

Under Alternative #3, existing neighborhoods could expect more infill development and changes in zoning than under any of the other alternatives. Like Alternative #2, changes to development regulations would promote attached single-family dwellings in all single-family neighborhoods. Somewhere between 200 and 300 acres of land would be upzoned for multi-family use under this option. Also, because this alternative is linked to the highest population growth rate and total, it is likely that existing neighborhoods which are not rezoned will experience more residential infill development than under any other alternative. Within the unincorporated portion of the UGA, about 604 acres of vacant land would be zoned for residential uses.

The population holding capacity analysis contained within the DEIS (*see* pages XI-34 and XI-35 of the Draft Plan & DEIS), concludes that:

- ☐ Port Townsend has an abundant supply of land suitable for residential use; and
- ☐ The City is not likely to approach build-out within the next 20 years under any plausible growth scenario.

The analysis also reveals that there is sufficient residential land capacity under all of the alternatives to accommodate the population projections associated with each. Moreover, sufficient capacity for population and residential growth exists within the present corporate limits of the City. Consequently, options that envision expanding the UGA to include additional undeveloped residential land would only increase the excess population capacity that already exists within the corporate limits. Finally, all of the alternatives reviewed in the DEIS provide sufficient land and densities to accommodate the City's 20 year population allocation of 5,510 additional residents under the Joint Population Forecast adopted by Jefferson County and Port Townsend.

Commercial & Manufacturing Areas: Under the No Action Alternative, existing commercial and manufacturing zones would not be expanded, and new commercial and manufacturing development would be limited to infill development on vacant or under-used lots within existing zones. Overall, the No Action Alternative would likely constrain economic and employment growth within the area, reinforcing the current imbalance between jobs and housing.

Alternative #1 would have impacts very similar to the No Action Alternative. It is doubtful that sufficient employment would be generated under this option to provide in-migrants with "family-wage" jobs. Consequently, this option is most likely to reinforce current demographic trends toward a retirement/residential community. Most of the increases in employment would occur via infill development and redevelopment on lands currently zoned for commercial and manufacturing use, and through home based businesses and cottage industries as presently allowed under the City's Code. In sum, this option is likely to constrain economic and employment growth and intensify the jobs/housing imbalance.

Alternative #2 would modestly increase the amount of land available for commercial use within the City limits. Nearly all of this land would be in new "mixed use centers" located at major intersections. With ground floor commercial and upper floor residential, these areas would provide increased, though limited, opportunities for small scale retail and service businesses. No in-City expansions of manufacturing zones are contemplated under this option. However, this option would expand the limits of the Port Townsend UGA to encompass the 356 acre Highway 20 Commercial and Light Manufacturing District in the Glen Cove area. When provided with the full range of urban public services, the land within the Glen Cove area could significantly enhance the area's potential for economic and employment growth, and help to remedy the jobs/housing imbalance.

Alternative #3 would significantly increase the amount of land available for commercial and manufacturing use within the City's corporate limits. It is estimated that 471 total acres would be zoned for commercial and manufacturing use in-City (*i.e.*, 186 additional acres). This Alternative would significantly enhance opportunities for economic growth, ranging from the marine trades, and small and medium scale retail and service sector businesses, to larger scale auto-oriented retail developments. Outside the City limits, this option would expand the UGA to include some 604 acres of land for commercial and manufacturing uses, including the Port Townsend Paper Mill. Like Alternative #2, the combination of urban public infrastructure, with vacant and appropriately zoned land could maximize the area's potential for economic development and resolve the jobs/housing imbalance.

The employment holding capacity analysis contained within the DEIS (*see* pages XI-40 and XI-41 of the Draft Plan & DEIS) reveals that the No Action Alternative and Alternative #1 likely do not provide sufficient commercial and manufacturing land to maintain a healthy local economy and employment base. By contrast, Alternatives #2 and #3 may designate more land than is needed to support the projected growth. This surplus appears linked to the inclusion of the Glen Cove area within an expanded FUGA. Additional information and analysis are needed to ensure that any expansion of the FUGA is directly linked to projected demand and need for commercial and manufacturing land.

Parks, Open Spaces & Environmentally Sensitive Areas (ESAs): Due to greater incidence of intrusion by children, hikers and pets, Alternative #3 is likely to have the greatest impacts on the community's open spaces, wildlife areas, and parks. The cumulative effects of incremental and widely dispersed development under the No Action Alternative and Alternative #1 would likely be greater than Alternative #2 which seeks to concentrate new development around mixed use centers, while systematically preserving key open space and habitat areas.

Agricultural Lands: Alternatives #2 and #3 which promote higher levels of population growth within the Port Townsend Planning Area will have the least impacts to agricultural lands in unincorporated Jefferson County. The No Action Alternative and Alternative #1 which are tied to the lowest amount of population growth will create more growth pressures outside Port Townsend, including agricultural lands in unincorporated Jefferson County.

Shoreline Areas: None of the four alternatives under consideration propose land use designations which are inconsistent with the present SMP designations. However, the alternatives do anticipate different land use and zoning designations within shoreline areas. Specifically, the No Action Alternative, Alternative #1, and

Alternative #2 would not direct any changes to land use designations in shoreline areas. However, Alternative #3 would establish three new zoning designations to be applied to lands within the Urban Waterfront Special District: marine-related commercial; marine-related manufacturing at the Boat Haven; and marine-related manufacturing at Point Hudson.

Lands for Public Facilities: Regardless of which alternative is selected, it is likely that the City will need to construct two new facilities over the next 20 years which could require significant amounts of land: an expanded wastewater treatment facility, most likely located within either the North Beach or Winona Subarea; and a combined Police and Fire, or "Public Safety" building, probably located in the eastern section of the Hastings Subarea, or the southwestern portion of the Fort Worden Subarea.

To the extent that lands designated for residential use are acquired for public facilities, the population holding capacity of the Port Townsend Planning Area will be reduced, or the population capacity of such land would have to be accommodated elsewhere within the Planning Area. If commercial or manufacturing lands are acquired for public facility needs, the employment holding capacity of the Port Townsend Planning Area would be reduced, or the job capacity of such land would have to be accommodated elsewhere in the Planning Area.

Lands for Essential Public Facilities: Essential Public Facilities will continue to be needed to support additional growth both inside and outside the Port Townsend Urban Growth Area. When such facilities are proposed for lands within the Port Townsend Planning Area, there will be additional concerns about land use compatibility and environmental impact.

Housing & Population

Housing Types & Neighborhood Character: Alternatives #2 and #3, which are linked to the highest levels of population and housing unit growth, are likely to affect neighborhood character more than either the No Action Alternative or Alternative #1. Alternative #2 would seek to create distinct, higher density neighborhoods surrounding mixed use centers, while retaining key open space areas. Alternative #3 would promote more urban development patterns city-wide, and would concentrate higher density multi-family areas near places of employment. Because Alternative #3 is linked to the highest levels of population and employment growth, it is also the option most likely to lead to larger scale housing developments.

Under the No Action Alternative and Alternative #1, the widely dispersed residential development patterns of today are likely to continue. Incremental, lot by lot, single-family residential growth is likely to be the dominant form of development under these alternatives, and innovative housing types may be somewhat less likely than under Alternatives #2 and #3.

Housing Affordability: The No Action Alternative and Alternative #1 are likely to result in the highest long-term housing costs. This is because these options would substantially limit the supply of moderate and higher density housing, thus preventing builders from realizing the economies of scale possible with higher density housing. By contrast, Alternatives #2 and #3, which provide higher proportions of land designated for moderate and higher density multi-family development would likely promote more affordable housing opportunities.

While all four Plan Alternatives would be accompanied by Plan policies intended to increase the supply of affordable housing, the greatest emphasis would occur under Alternatives #2 and #3. Under Alternatives #2 and #3, efforts to increase housing affordability would include code revisions to allow a wider variety of housing types, sizes and densities. Code revisions would include: allowing attached single-family dwellings in all single-family residential areas (*i.e.*, duplexes, triplexes and fourplexes); allowing manufactured homes on individual lots in all single-family areas (with the possible exception of the National Register Historic District);

and zoning anywhere from 125 to approximately 222 additional acres of land for moderate and higher density multi-family development.

Historic & Cultural Preservation

Under all alternatives, existing historic preservation regulations would continue to be used to guide development within the National Register Historic District.

The continued attractiveness of Port Townsend as a visitor destination would likely provide sufficient development incentives to prevent historic structures in the Downtown area from falling into disrepair under the No Action Alternative and Alternative #1. Alternative #2 would not create concentrated growth pressures in subareas with large concentrations of historic structures. However, policies adopted under this option would promote revitalization and adaptive reuse of buildings in the Historic District. These policies could promote the conservation of key historic resources.

Alternative #3, which envisions concentrated development along the Sims Way/Water Street corridor, could expose the largest number of historic sites and buildings to pressure for redevelopment. However, the more vital economy promoted by this option could serve as a stimulus for preservation and adaptive reuse, especially if coupled with financial incentives.

Transportation

Overall Road & Street System: Analysis conducted by Henigar & Ray in June of 1994 indicates that new roads will be needed circulate traffic in the northwest quadrant of town, regardless of which Plan alternative is selected. Although construction of these roads is not anticipated in the near term, potential future impacts associated with these new roads, or widening of existing roads would include: temporary construction-related impacts (e.g., erosion, traffic congestion); and long-term operations and maintenance costs.

In addition to the roads needed to serve growth and development in the northwestern quarter of the City, four existing roads are projected to fall below LOS D under any alternative. These roads include:

- ☐ Water Street (from the Ferry Terminal to Monroe Street);
- ☐ 19th Street (from Sheridan Street to San Juan Avenue);
- ☐ Sheridan Street (from Sims Way to Discovery Road); and
- ☐ Kearney Street (from Sims Way to Blaine Street).

Under the No Action Alternative and Alternative #1, both Sheridan and Kearney Street are predicted to fall below LOS D.

The higher growth rate and total associated with Alternative #2 is likely to cause significant impacts to traffic along Sims Way. The concentrated residential and commercial development surrounding the mixed use centers located at arterial or arterial/collector intersections could also significantly affect the overall flow of traffic within town. In particular, the San Juan/F Street and the Hastings Avenue/Howard Street intersections are likely to experience significantly higher traffic volumes than under baseline conditions.

Alternative #3 is likely to pose the most significant impacts to growth along Sims Way. Several other key roadways would fall below LOS D under this alternative, including Discovery Road and Hastings Avenue. These roads are likely to experience reduced carrying capacities as the more urban development form leads to interruptions in traffic flow. Alternative #3 is also likely to dramatically reduce the carrying capacity of Kearney Street. Finally this alternative is more likely to force motorists to find alternate routes than the other options. Some of this "overflow" traffic could seriously impact existing neighborhoods.

Nonmotorized Facilities (Bicycles, Pedestrians, & Trails): The widely dispersed development patterns of the No Action Alternative and Alternative #1 are not supportive of nonmotorized forms of transportation, such as walking or biking. Alternatives #2 and #3 are likely to promote more nonmotorized activity than the other alternatives. Because these alternatives seek to encourage higher residential density concentrations near where people work, it is more likely that people would walk or bicycle than drive under these options. Shorter walking distances to transit stops would also likely lead to increased transit effectiveness.

Transit Facilities & Services: Because of the increased travel distances and lower overall population densities, the No Action Alternative and Alternative #1 would be more difficult for transit to serve than Alternatives #2 or #3. The widely dispersed residential land use patterns of the No Action Alternative and Alternative #1 would be more expensive to serve with transit, and potentially less appealing to riders. Indirectly, these options would lead to more people driving longer distances.

Alternative #2 promotes a land use pattern that is highly supportive of transit service and nonmotorized options. The mixed use centers surrounded by higher density residential areas would likely lead to shorter walking distances from home to transit stops. The more concentrated development patterns would also assist Jefferson Transit in determining appropriate routes and stops. In sum, this alternative is likely to lead to more riders per mile and fewer overall miles of transit routes in Port Townsend.

Overall, Alternative #3 would be expected to have beneficial impacts similar to those described for Alternative #2. On balance, this option is expected to be more pedestrian and transit supportive than either the No Action Alternative or Alternative #1, resulting in proportionately less reliance upon the automobile.

Ferry Facilities & Services: The No Action Alternative and Alternative #1 are likely to pose the least impact to the Port Townsend/Keystone Ferry crossing. Because these options would likely result in lower rates of "population capture" for Port Townsend, local ferry ridership is not expected to increase significantly. The impacts of both Alternatives #2 and #3 are likely to be greater than the No Action Alternative or Alternative #1. Under both Alternatives #2 and #3, increased demand for ferry service from Port Townsend to Keystone is likely to increase ferry traffic queuing problems in the eastbound lane of Water Street from Kearney Street to the Ferry terminal. These queuing problems are likely to lead to additional peak season congestion along Water Street, as well as increased hazards for pedestrians and bicyclists.

Parking Facilities: Because the No Action Alternative and Alternative #1 are associated with lower population growth rates and totals than Alternatives #2 or #3, these options could generate the least overall demand for additional parking facilities. However, the widely dispersed development patterns allowed by these options could increase reliance upon the automobile, resulting in a higher proportionate demand for parking in relation to population.

Although Alternative #2 is associated with a higher population growth rate and total than either the No Action Alternative or Alternative #1, it is also the most supportive of transit and alternative modes. Thus, the overall need for additional parking facilities would be less in relation to population than under any of the other alternatives.

The high growth rate and total anticipated under Alternative #3 would likely generate the highest overall demand for additional parking facilities. However, the more urban and transit-supportive development patterns under this option would create less proportionate demand for parking facilities than the No Action Alternative or Alternative #1.

Public Services & Utilities

Fire Protection Facilities & Services: Fire service demands in side the Planning Area would be greatest under Alternative #3, and less so for Alternatives #2 and #1. The No Action Alternative would likely have the least overall impact on fire service. Alternative #3 may require enhancement of facilities and equipment oriented towards commercial and manufacturing development. Alternative #2 may require less investment on a City-wide basis than the other alternatives, because the greater concentrations of growth in and around the mixed use centers could be served by less equipment. Alternative #1 and the No Action Alternative would likely require equipment comparable to Alternative #2; however, the dispersed growth patterns promoted by these options could result in increased response times. Under Alternatives #2 and #3 would require Port Townsend to eventually assume responsibility for providing fire and other emergency services to the unincorporated portion of the UGA (*i.e.*, upon annexation).

Police Facilities & Services: Population driven demand for police services would increase under all of the alternatives, and the burden of serving the unincorporated portion of the UGA will eventually be transferred from the County Sheriffs Department to the City Police Department under Alternatives #2 and #3. Overall, population driven demand for law enforcement would be the greatest under Alternative #3. Alternative #2 would also create substantial demand for additional law enforcement services, however, the compact growth and development patterns promoted by this option could create neighborhoods that are easier to police than the dispersed patterns supported by the No Action Alternative and Alternative #1.

Library Facilities & Services: The population increase expected in Port Townsend under any of the alternatives means that demand for library services can be expected to grow.

School Facilities & Services: Population driven demand for school services would increase under all of the alternatives. Alternative #3, Urban Community, anticipates the highest levels of population and employment growth, followed by Alternatives #2 and #1. The No Action Alternative and Alternative #1 both anticipate lower rates of population "capture" than Alternatives #2 or #3. Thus, if the No Action Alternative or Alternative #1 were selected, a greater burden would be placed on the Chimacum School District, as that area absorbs a greater proportion of the County-wide increase in population.

Park & Recreation Facilities & Services, & Open Spaces: The No Action Alternative is not linked to a specific population growth objective, and does not seek to "plan" to accommodate growth. It is likely that additional park and recreational facilities would be needed under this option, but would only be provided on an ad hoc basis. It is estimated that about 31 additional acres of park land would be needed to maintain Port Townsend's existing level of service under Alternative #1, along with expanded recreational facilities and services. About 40 additional acres of park land would be needed to maintain Port Townsend's existing level of service under Alternative #2. Because Alternative #2 is intended to promote pedestrian friendly mixed use centers connected by open spaces and trails, this option could be expected to generate the highest overall demand for parks and open spaces. About 77 acres of park land would be needed to maintain Port Townsend's existing level of service under Alternative #3; however the more urban development patterns associated with this option may result in even higher demands for parks and open spaces.

Water Supply & Distribution Facilities: Using the State Department of Health's recommended raw water LOS of 800 gallons a day per connection, raw water demands will exceed supply under all of the alternatives assuming a supply of 4,000,000 gallons per day. Moreover, Alternatives #2 and #3 may generate raw water demands that exceed supply even if a supply of 5,000,000 gallons per day is available (*i.e.*, if 1,000,000 gallons per day are reallocated from the Tri-Area to Port Townsend).

In terms of the overall distribution system, the No Action Alternative and Alternative #1 would generate significant impacts associated with their dispersed development patterns. Despite a significant FUGA expansion, Alternative #2 would concentrate development within the City limits in proximity to existing water lines, likely reducing the overall need for system expansions. Alternative #3, which anticipates urban level development throughout substantial portions of the City as well as Glen Cove, could generate the greatest need for water system expansions, and the need for the most linear feet of distribution lines.

Wastewater Collection & Treatment System: Expanded wastewater collection and treatment facilities will likely be needed to support growth and development regardless of the alternative selected. The dispersed development patterns which characterize the No Action Alternative and Alternative #1 promote a development pattern that will likely require more linear feet of collection lines and pump stations than the other alternatives in relation to population. By contrast, Alternative #2 would concentrate development within the City limits in areas near existing collection lines, reducing the need for new lines. However, extending lines into the unincorporated portion of the UGA could result in overall demands for system expansions which are similar to the No Action Alternative and Alternative #1. The urban development patterns promoted by Alternative #3 would generate the greatest need for new collection lines, both within the City and the unincorporated UGA.

Stormwater Management Facilities: Potential impacts of increased stormwater runoff associated with future development under each of the alternatives are discussed under the Surface Water Impacts section (*see* page 20, above). Regardless of the alternative selected as the preferred option, a "natural drainage systems" approach will be employed to meet most of the City's stormwater management needs. However, the higher development densities anticipated under Alternatives #2 and #3 would require a greater number of engineered or regional drainage system improvements than the No Action Alternative or Alternative #1.

General Government Services: Increased population associated with development under any of the alternatives would result in additional demand for general government services.

Communications Services (Local Telephone, Cellular Telephone, & Cable Television): Alternative #3 will require the most extensive expansions of facilities and services, followed by Alternatives #2 and #1.

SUMMARY OF POTENTIAL MITIGATION MEASURES

The Natural Environment

Earth Resources

- ☐ Continue to implement the City's ESA regulations (Chapter 19.05 PTMC) to mitigate impacts to earth resources.
- ☐ Implement the Stormwater Management Manual for the Puget Sound Basin to assist in mitigating earth-related impacts.
- ☐ Encourage the use of "skinny streets" that help to retain the City's small town character and minimize the amount of road construction and related soil disturbance.
- ☐ Develop, adopt and implement subdivision regulations that require new developments to be designed to integrate with the existing topography to the maximum extent possible.
- ☐ Reduce parking requirements and/or impose parking limitations to reduce the amount of grading and impervious surfaces required to create flat parking areas.

Air Quality & Odor

- ☐ Include policy language within the Land Use Element of the Comprehensive Plan that defines Port Townsend's commitment to a "clean air future" by supporting the Olympic Air Pollution control Authority's (OAPCA) air pollution abatement and prevention activities, including the requirements of the federal Clean Air Act Amendments and the state Clean Air Act.
- ☐ Direct economic development efforts and zoning towards attracting "clean" commercial, small-scale industrial, and manufacturing uses to the Planning Area.
- ☐ Increase enforcement of dust suppression requirements during demolition, grading and construction activities, including: watering sites; washing construction vehicle tires and frames; installing and maintaining gravel construction entrances; and requiring that all trucks carrying soil be covered.

Surface Water

- ☐ Encourage the provision of alternative modes of transportation to reduce the amount of impervious surfaces (*e.g.*, new roads and parking lots) and minimize the discharge of pollutants in stormwater runoff.
- ☐ Preserve existing natural drainage features (*e.g.*, wetlands and natural drainage corridors) to the maximum extent feasible, in order to reduce the capital facility costs associated with engineered stormwater control systems.
- ☐ Complete and adopt a City-Wide Stormwater Master Plan, containing an assessment of the likely impacts of development in each of the City's 16 drainage basins, and recommending capital facility improvements to assist in the treatment and cleansing of stormwater runoff.
- ☐ Establish densities and requirements for impervious surface coverage that limit stormwater generation to levels not likely to cause flooding, significant erosion to natural drainage ways, or significant degradation of aquatic habitat water quality.

Groundwater

- ☐ Provide sanitary sewer service to all areas within the Port Townsend UGA boundary; require all new development to connect the City's collection and treatment system.
- ☐ Review, and if necessary amend, Chapter 19.05 PTMC to ensure that businesses that store, transport, make, or use hazardous substances in areas which overlay sensitive aquifers are regulated so that risks to groundwater resources are minimized.
- ☐ Set maximum limits for impervious surface coverage in order to maintain existing rainwater infiltration characteristics.

Floods

- ☐ Retain wetlands, drainage corridors and other areas that provide important flood control functions.
- ☐ Complete and adopt a City-wide Stormwater Master Plan, containing an assessment of the likely impacts of development in each of the City's 16 drainage basins, and recommending capital facility

improvements to assist collection and stormwater runoff and prevention of flood events.

- ☐ Continue to work with specific neighborhoods to review drainage problems and update stormwater ordinances and program capital improvements to provide adequate drainage for the land uses planned.

Plants & Animal Habitat

- ☐ Promote clustering of single-family development to protect the City's larger undeveloped parcels.
- ☐ Plan to establish an interconnected system of parks, trails, open spaces, and wildlife corridors. Pursue a variety of means in developing the open spaces and trails network, including outright purchase of key parcels.
- ☐ Complete an inventory of wildlife habitat/open space within the Port Townsend UGA, including habitats and species of local importance as well as priority habitats and species.
- ☐ Continue to implement, and revise if necessary, the Environmentally Sensitive Areas regulations contained in Chapter 19.05 of the Municipal Code, to require protection and/or enhancement of plant and animal wildlife habitat areas within new developments. In this regard, consider developing and adopting specific minimum performance standards for larger developments, which must be incorporated into site-specific habitat management plans.

Energy

- ☐ Place greater emphasis on energy conservation as opposed to new generation.
- ☐ Work with the Puget Sound Power and Light Company to design transmission and distribution facilities to be more aesthetic and compatible with neighborhoods.
- ☐ Encourage underground placement of utility lines and other equipment, whenever feasible.

The Built Environment

Environmental Health

Noise:

- ☐ Encourage site designs which provide separation or sound barricades between sensitive land use activities and potential sound sources.
- ☐ Require increased noise attenuation between uses in mixed use buildings and projects to protect residential uses.
- ☐ Regulation hours of operation for nonresidential activities (*i.e.*, home based businesses and cottage industries) in residential neighborhoods.

Light & Glare: Improved lighting technology, use of nonreflective building materials, careful placement and screening of outdoor illumination, screening between individual properties, and planting trees in parking areas, around buildings, and along streets will reduce the impacts of light and glare from all four alternatives.

Land & Shoreline Use

Land Use Compatibility:

- ☐ Locate medium and high density residential zones in areas of the city most suitable for such land uses, based on considerations of ESAs, the availability of existing services, public utilities and facilities, and transportation facilities.
- ☐ Encourage higher density residential development in areas where the existing infrastructure patterns or terrain are conducive to walking, bicycling, and frequent transit service.
- ☐ Zone new commercial areas along the street edge of arterials, and encourage shared access and parking towards the back or side of the lot of commercial developments. Where possible, allow the Gateway Commercial Corridor to be increased in depth to enable development of integrated commercial projects which depart from commercial strip development. Prohibit the expansion of such areas where it would significantly diminish the livability of an adjoining neighborhood.
- ☐ Locate regional commercial retail zoning districts in the unincorporated portion of the Port Townsend UGA.
- ☐ Locate new commercial and manufacturing zoning districts in locations with the following characteristics:
 - A location near an arterial with good highway access and transit service;
 - Adequate existing or planned infrastructure capacity;
 - Few environmental constraints; and
 - Compatible surrounding land uses.
- ☐ Design, locate and buffer public facilities in a manner which protects the character of the surrounding neighborhood (*i.e.*, through fencing, landscaping, etc.).

Population & Employment Growth:

- ☐ Apply the following mitigation measures to the No Action Alternative and Alternative #1:
 - Maximize the potential for commercial development in the downtown area (*i.e.*, adaptive use and reuse of the upper floors of historic buildings and infill on vacant parcels) and the Gateway Commercial Corridor;
 - Allow the Gateway Corridor to be increased in depth to enable development of integrated commercial projects which depart from commercial strip developments.
- ☐ Apply the following mitigation measures to Alternatives #2 and #3:
 - Reduce the employment holding capacity of these alternatives by downsizing the unincorporated portion of the UGA to bear a direct relationship to the projected employment needs at the end of the 20 year planning horizon; and
 - Reduce the excess population holding capacity of Alternatives #2 and #3 by limiting or eliminating residential areas from inclusion within the unincorporated portion of the UGA.

Parks, Open Spaces & ESAs:

- ☐ Continue to use, and revise as necessary, the City's ESA ordinance to require protection and/or enhancement of ESAs within new developments.

- ☐ Develop a comprehensive open spaces and trails functional plan and implementing program which protects the natural environment and provides passive open space opportunities; develop a parks and recreation functional plan which is responsive to the needs and interests of city residents.

Agricultural Lands: Continue to encourage agricultural uses in the least developed parts of town by allowing certain agricultural uses outright in low density residential areas; specify allowable agricultural uses in revisions to the zoning code.

Shoreline Areas:

- ☐ Where feasible, acquire additional shoreline access areas.
- ☐ Provide signage to promote public access to shoreline areas.
- ☐ Work with the Port of Port Townsend to provide for the development of the Boat Haven and Point Hudson properties in a way that ensures the long-term viability of marine uses, the vitality of the area for port-related uses, and compatibility with surrounding areas.

Lands for Public Facilities: Acquire additional land for public facilities within the financial limits established by the Capital Facilities & Utilities Plan.

Housing & Population

Neighborhood Character:

- ☐ Develop design guidelines to apply to duplexes, triplexes and fourplexes in single-family residential areas.
- ☐ Develop design guidelines to apply to all multi-family dwellings (*i.e.*, all structures containing five or more dwelling units).
- ☐ Incorporate policies into the Comprehensive Plan which ensure that special needs housing can be integrated throughout the community, rather than concentrated in specific subareas.
- ☐ Promote resubdivision and infill on large single-family lots in order to more efficiently use existing residential land with the least change to neighborhood character.
- ☐ Promote transition in height and bulk of permitted buildings between higher density multi-family areas and lower density single-family areas.

Housing Affordability:

- ☐ Encourage the provision of affordable housing by designating more land for higher density housing.
- ☐ Require minimum densities for all residential developments.
- ☐ Encourage small lot subdivisions to enable more housing units to be built and to lower the per-unit cost of the land.
- ☐ Provide density incentives for affordable housing.
- ☐ Allow a mix of dwelling types in single-family neighborhoods, including: manufactured housing; duplexes; triplexes; and fourplexes.

Historic & Cultural Preservation

- ☐ Establish additional historic and other overlay zones to preserve special neighborhoods and districts.
- ☐ Encourage public/private financial incentives for rehabilitation of historic structures, including public purchase of historic structures for redevelopment and reuse.
- ☐ Identify and implement financial and other incentives to protect significant existing historic resources and to encourage economically feasible adaptive reuse.
- ☐ Develop more stringent historic preservation policies and regulations that prohibit the demolition of viable existing structures which contribute to the City's cultural and historic heritage.

Transportation

Overall Road & Street System:

- ☐ Increase roadway capacities as recommended within the Draft Arterial Street Plan, the Gateway Development Plan, and the Transportation Element of the Draft Comprehensive Plan.
- ☐ Preserve and acquire rights of way for a new east/west collector road and a north/south collector road to serve future growth and development in the northwestern quadrant of the City.
- ☐ Adopt arterial street standards to ensure that adequate local streets are available concurrent with development.

Nonmotorized Facilities (Bicycles, Pedestrians & Trails):

- ☐ Adopt and implement a Comprehensive Nonmotorized Plan to guide development of pedestrian and bicyclist improvements.
- ☐ Provide for safe and convenient pedestrian and bicycle use on all developed public street rights-of-way, consistent with adopted street standards.
- ☐ Require walkways and bike lanes on both sides of all arterials and collectors and any other streets abutting multi-family and commercial development.
- ☐ Designate certain right-of-way corridors for nonmotorized use only. Preserve streets designated as "not to be opened" as open space, utility easements, or part of the nonmotorized transportation network.
- ☐ Coordinate with Jefferson Transit to ensure that park-and-ride facilities are functioning as multi-modal stations linked directly to the nonmotorized network.

Transit Facilities & Services:

- ☐ Require new development and redevelopment to incorporate transit-supportive and pedestrian-friendly design elements and features.
- ☐ Require street level pedestrian uses in buildings in commercial, office, or mixed-use centers with bus routes and nearby bus facilities to stimulate activity and interest.
- ☐ Encourage zero foot frontage setbacks for commercial uses on streets with bus facilities to encourage transit use. Require parking to be located in the rear or to the sides of buildings.

Ferry Facilities & Services:

- ☐ Coordinate with the WSDOT Ferries Division and the Peninsula Regional Transportation Planning Organization (RTPO) to set a LOS standard for the Port Townsend-Keystone Ferry. Encourage a LOS standard of a one-boat wait on weekdays, and a two-boat wait on weekends.
- ☐ Support the expansion of passenger-only ferry service from Port Townsend to other Puget Sound urban areas as well as the San Juan Islands and Victoria, B.C., and cooperate with state and federal governments and the Province of British Columbia to explore the feasibility of direct ferry service from Port Townsend to these locations.

Parking Facilities:

- ☐ Develop a Parking Management Plan that encourages short-term and discourages long-term (*i.e.*, 4 or more hours) parking in the Commercial Historic District and other commercial areas, to ensure vital retail activities.
- ☐ Implement parking strategies that maximize the ability for the greatest number of people to use the Downtown, emphasizing the accommodation of "person trips" rather than automobile parking places, thereby minimizing adverse traffic and parking impacts on the Commercial Historic District.
- ☐ Develop parking lot design standards that assure pedestrian friendly parking facilities by providing protected pedestrian links between parking facilities and employment and other service centers, arterials, transit facilities, and green space.

Public Services & Utilities

Fire Protection Facilities & Services:

- ☐ Decline to annex areas within the unincorporated Glen Cove portion of the UGA (*i.e.*, under Alternatives #2 and #3) until plans and funding for new or expanded facilities can be established.
- ☐ Allocate tax revenues associated with future population and employment growth to provide the community with additional fire suppression services.

Police Facilities & Services:

- ☐ Provide increased police services as the demand for such services is demonstrated.
- ☐ Allocate tax revenues associated with future population and employment growth to provide the community with additional law enforcement officers and facilities.

Library Facilities & Services: Allocate tax revenues associated with future population and employment growth to provide the community with additional library services.

School Facilities & Services:

- ☐ Allocate tax revenues associated with future population and employment growth to provide the community with additional school facilities.
- ☐ Require school impact fees for new residential development.
- ☐ Require that adequate school facilities and capacity are in place prior to approving new residential developments.

Parks & Recreation Facilities & Services & Open Spaces:

- ☐ Develop and implement a parks and recreation plan and implementation strategy that addresses the City's needs for active recreation facilities.
- ☐ Provide a wide range of athletic facilities such as: tennis courts; baseball and softball fields; gymnasiums; swimming pools; multi-purpose fields for soccer and general outdoor play; volley ball courts; and a golf course.
- ☐ Acquire and develop public park and recreation lands to serve the future population of the City within the financial capabilities and level of service standards established in the Capital Facilities Plan.
- ☐ Develop and implement an open spaces and trails plan and implementation strategy that protects the natural environment, provides passive recreation opportunities, and is integrated with the nonmotorized component of the Transportation Plan.

Water Supply & Distribution Facilities:

- ☐ Establish fees and charges that recover costs related to water system development.
- ☐ In the preparation of the next Water System Plan, work with the Washington State Department of Health (DOH) to reduce the maximum day level of service (LOS) standard to a level that more accurately reflects actual historic water use patterns in Port Townsend.
- ☐ Reserve and develop water supplies and system capacity required to meet the current and future water demands of City water utility customers. Explore a wide range of possible avenues for obtaining additional water, including:
 - Conservation and reallocation of water resources currently used by the Port Townsend Paper Company, and renegotiation of the contract with the mill for peak day water use;
 - Protecting and maximizing existing groundwater rights;
 - Innovative technologies which may become economically feasible within the 20 year planning period, including, desalinization and aquifer storage and recovery; and
 - Developing additional water storage capacity.

Wastewater Collection & Treatment System:

- ☐ Recognize that growth and development will require the City to expand its wastewater collection and treatment system capacities within the 20 year planning horizon. Ensure that an expanded wastewater treatment plant is on-line before the existing plant reaches or exceeds capacity.
- ☐ Evaluate and develop revenue sources to fund wastewater collection and treatment system improvements and expansions. Ensure that new development pays its fair share of the costs of wastewater system development through the use of system development charges and impact fees.
- ☐ Complete replacements and improvements to the wastewater system in accordance with the Capital Improvement Plan (CIP).

Stormwater Management Facilities:

- ☐ Continue to enforce and update the City's Drainage Ordinance (Chapter 16.32 PTMC). Specifically, adopt the Stormwater Management Manual for the Puget Sound Basin, and the Puget Sound Water Quality Authority's Model Stormwater Control Ordinance to provide mitigation of project-related stormwater impacts to drainage corridors and wetlands under all alternatives.

- ☐ Complete and adopt a City-wide Stormwater Master Plan, containing an assessment of the likely impacts of development in each of the City's 16 drainage basins, and recommending capital facility improvements to assist in the treatment and cleansing of stormwater runoff.
- ☐ Provide, or require developers to provide, regional stormwater detention and treatment facilities in drainage basins most likely to be adversely affected by new development (*e.g.*, basin #4).

General Government Services: Allocate tax revenues associated with future population and employment growth to provide additional general government services as the need arises.

Communications Services (Local Telephone, Cellular Telephone, & Cable Television): Encourage communications service providers to develop long-range master plans for the placement of facilities in the Planning Area, particularly those facilities which would be subject to environmental review, public hearings, and final approval by the City Council.

Electricity Supplies & Facilities:

- ☐ Accommodate additions and improvement to electric utilities in a manner consistent with the needs and resources of Port Townsend as well as other neighboring jurisdictions.
- ☐ Encourage Puget Power to make additions to and improvements of electric utility facilities to provide adequate capacity for projected future growth.

Encourage the use of joint utility corridors, provided that such joint use is consistent with limitations prescribed by applicable law and prudent utility practice.

SUMMARY OF UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

The Natural Environment

Earth Resources

Grading is an activity to be expected on all development sites. Erosion will occur during construction under all of the Plan alternatives.

Air Quality & Odor

Local levels of suspended particulates (*i.e.*, dust) will increase during grading and excavation associated with new construction. Additional vehicle traffic will result in increased emissions of carbon monoxide and ozone. Exposure to odors, which some people may consider nuisance odors, will increase as population and employment becomes more dense over the 20 year planning period.

Surface Water

Impervious surface areas will increase as the town grows under all of the alternatives. This will result in an increase in the volume of stormwater runoff generated and the need to detain it to prevent flooding. The level of pollutants in the runoff will also increase. Additionally, increased population and business, commercial and industrial activity will increase the potential for spills of hazardous materials into surface water bodies. Over time, alteration of the wetlands and natural drainage corridors will occur as growth in the Port Townsend UGA continues.

Groundwater

Continued development activities under any of the four alternatives would result in a cumulative increase in impervious surface area, and an increased likelihood for groundwater degradation resulting from infiltration of runoff containing urban type pollutants.

Floods

None have been identified.

Plants & Animal Habitat

The diversity and number of species within the Port Townsend UGA will be reduced through growth and development. Some fragmentation and isolation of species is likely to occur during the 20 year horizon of the Comprehensive Plan. As a UGA, development within Port Townsend will pose probable significant adverse impacts upon plant and wildlife habitat areas. These impacts are contemplated under the GMA, and highlight the importance of regulating to protect plant and animal habitat areas which are located in rural and resource areas.

Energy

Increased population and employment will result in an increase in the amount of energy required, and may require the construction of facilities to provide the services.

The Built Environment

Environmental Health

Noise: Under all of the alternatives, increased population and employment will generate additional noise.

Light & Glare: The levels of artificial lighting and glare will increase with population and employment growth in the Planning Area under all of the "action" alternatives and the No Action Alternative.

Land & Shoreline Use

Land Use Compatibility: All four alternatives will allow additional residential, commercial and manufacturing development above current levels, and will increase the potential for land use conflicts and impacts within the Port Townsend Planning Area. Alternative #3 will allow the greatest amount of residential and nonresidential development, and would require the most intensive use of land. Alternative #2 would promote higher concentrations of residential development in and around mixed use centers, which could also increase the potential for commercial/residential land use conflicts.

Population & Employment Growth: Each of the alternatives allows for different levels of population and employment. If left unmitigated, the No Action Alternative and Alternative #1 will probably not generate sufficient employment opportunities to serve the population projection tied to each. Consequently, these alternatives could generate additional land use, infrastructure, and public service impacts in unincorporated Jefferson County as more people seek to live and work outside Port Townsend.

Parks, Open Spaces & Environmentally Sensitive Areas (ESAs): Under all alternatives, larger resident populations within the Port Townsend Planning Area will result in greater incidence of intrusion by children, hikers, and pets. Intrusions within ESAs may result in temporary, or in some cases, lasting adverse impacts to plant and animal habitats.

Agricultural Land: Under all alternatives, population growth and development within the Port Townsend UGA will result in the conversion of agricultural lands to accommodate additional housing and urban development. The land use intensities allowed within the Port Townsend UGA will also create different levels of land use demands outside the Planning Area. For example, under the No Action Alternative and Alternative #1, Port Townsend's population "capture rate" would likely be lower than under Alternatives #2 or #3. This would suggest that a greater number of persons would be living in unincorporated Jefferson County under the No Action Alternative and Alternative #1, leading to additional pressures to convert developable rural and resource lands outside the Planning Area to accommodate housing development.

Shoreline Areas: None have been identified.

Land for Public Facilities: Under all of the alternatives, additional land will have to be acquired by public agencies for construction of public facilities. The amount of land required for these facilities is not known at this time. As additional growth and land development occurs, the availability of land for public facilities will decrease and land prices will increase. If public facility providers acquire land for public facilities which were intended for commercial or manufacturing uses, the employment holding capacity of the Port Townsend Planning Area will decrease, unless commercial or manufacturing capacity is added elsewhere. Unavoidable adverse impacts are most likely under the No Action Alternative and Alternative #1, since these growth scenarios do not designate sufficient commercial and manufacturing land to serve the population projected for the end of the 20 year planning period.

Housing & Population

Under all alternatives, residential densities will increase, and residents will perceive changes in neighborhood character. As the population grows, the total number of people (*i.e.*, not the per capita incidence) who need subsidies in order to keep housing costs below 30% of income will increase. An unknown number of existing dwellings located in areas designated for higher density residential, commercial or manufacturing uses will be demolished or relocated as redevelopment occurs. In some instances, these redevelopment activities may result in the loss of existing affordable housing units.

Historic & Cultural Preservation

None have been identified.

Transportation

Overall Road & Street System: Future growth and development under any of the alternatives would result in transportation impacts, including increased traffic volumes, vehicle emissions, congestion, risk of accidents, increased stormwater runoff, and wear and tear on existing roadways.

Nonmotorized Facilities (Bicycles, Pedestrians & Trails): None have been identified.

Transit Facilities & Services: Under the No Action Alternative and Alternative #1, dispersed residential development patterns would result in greater traffic congestion, increased transit travel times, and a decrease in

the level of service. Under all of the alternatives, increases in the City's population base would result in additional costs associated with providing more hours of bus service within the Planning Area.

Ferry Facilities & Services: None have been identified.

Parking Facilities: Increased development under any of the alternatives would increase demand for parking facilities.

Public Services & Utilities

Fire Protection Facilities & Services: Increased population and employment and additional residential, commercial and manufacturing structures will result in a greater demand for fire and emergency medical services under any of the alternatives. Also, increased traffic volumes may adversely affect response times.

Police Facilities & Services: Under all of the alternatives, the demand for police services will likely increase as population and employment increase.

Library Facilities & Services: Library service demand will increase under any of the alternatives, resulting in a need for new or expanded facilities, materials, and services.

School Facilities & Services: Demand for new school facilities will increase under any of the alternatives, resulting in a need for new or expanded facilities and services.

Parks & Recreation Facilities & Services, & Open Spaces: Additional demand will be placed on existing park facilities under any of the alternatives. Additional land will have to be acquired and recreational facilities financed, constructed and maintained for park purposes. Land prices for potential parks and open spaces will likely increase.

Water Supply & Distribution Facilities: The increased population and employment growth associated with all of the alternatives will result in increases in demand for municipal water services, including the extension of water lines, and the need for additional storage and transmission facilities.

Wastewater Collection & Treatment System: The increased population and employment growth associated with all of the alternatives will result in increases in demand for municipal wastewater collection and treatment services.

Stormwater Management Facilities: Development related to additional population and employment growth will result in the creation of additional impervious surfaces under all of the alternatives. This will result in more surface water runoff and potentially adverse water quality impacts.

General Government Services: None have been identified.

Communications Services: Under all of the alternatives, additional communications facilities and services will be required to serve the increased population and employment base.

Electricity Supplies & Facilities: Under all of the alternatives, increases in population and employment will result in an increase in the amount of electrical energy required, and additional electrical distribution facilities.

VI. AN OVERVIEW DESCRIPTION OF THE PREFERRED PLAN

PUBLIC INVOLVEMENT & PROCESS

Introduction

Public participation has been vital in the development of Port Townsend's Comprehensive Plan. As a means to encourage public awareness of the comprehensive planning process and solicit comments from citizens, Port Townsend implemented an exhaustive public involvement process spanning nearly two and one-half years. Early public involvement efforts shaped the substance of the Draft Comprehensive Plan. Testimony submitted during the recently concluded formal public hearing process will help the City Council decide on final goal, policy, and land use map revisions prior to formal adoption anticipated on July 15, 1996. Major aspects of the public involvement process are highlighted below.

Summary of Public Involvement Process

Port Townsend 2020: Getting Together (PT 2020)

The PT 2020 Coffee Hour project was advertised frequently in the newspaper and by word of mouth. Over 80 citizens volunteered to host coffee hours. The City Planning and Building Department compiled and mailed coffee hour materials to interested hosts. Between March and May, 1993, over 1,400 hours of citizen discussion took place in living rooms throughout town, regarding the present and future direction of the City. Approximately 600 citizens responded to a questionnaire that sought information about the concerns and values of Port Townsend residents. Additionally, high school, junior high, intermediate and elementary school students participated and expressed their vision of Port Townsend in the year 2020. The product of this process was a report entitled, "PT 2020: *Getting Together* - Final Report of Coffee Hour Process and Results." The City Council accepted the PT 2020 report as a guide to be used in the City's future planning efforts.

Comprehensive Plan Workgroup Public Workshops

In May of 1994, the Mayor appointed five Comprehensive Plan Development Committees, one for each of the elements of the Plan. The Committees, comprised of seven to eleven members each, included City Council members (one of whom served as Chairperson for each Workgroup), Planning Commissioners, and citizen volunteers representing a wide spectrum of philosophies and opinion. These Workgroups conducted public workshop meetings to develop goals, policies and implementation strategies for the Draft Plan. The City Council's Comprehensive Plan Coordinating Committee worked throughout the process to coordinate the efforts of the Workgroups. Between May, 1994 and August, 1995, the Workgroups held over 50 meetings and workshops as they gathered information, identified key issues, prepared draft Plan elements and provided feedback on the alternatives proposed for the DEIS.

City Council & Planning Commission Public Workshops & Hearings

In February (*i.e.*, following soon after the release of the Draft Plan on January 10, 1996), the City Council and Planning Commission held a series of four "community workshops" to make sure that everyone knew what was in the draft, and to discuss key issues addressed by the Plan.

Beginning in March of 1996, the Planning Commission began a series of eight more formal public hearings in order to hear what City residents thought about specific chapters of the Draft Plan. These hearings were concluded on April 24, 1996. Following these hearings, the Planning Commission held a series of seven closed

record meetings to prepare findings, conclusions, and recommendations for the advice of the City Council. These recommendations were forwarded to the Council on June 3, 1996.

Between June 3 and June 18, 1996, the City Council held a series of four public workshops to review the Draft Plan and the specific revisions recommended by the Planning Commission. On June 19 and 20, 1996, the Council held two additional hearings to listen to public comments on the Draft Plan. The Council is currently in the middle of a series of five public meetings to deliberate upon public testimony received, and direct final changes to the Plan goals, policies, implementing strategies, and land use map.

The Council expects to adopt the new Plan on July 15, 1996. As has been the case throughout the process, hearings have been advertised through a wide variety of media, including mailings, legal ads, and display ads.

Cable TV

The Port Townsend cable television station (Channel 8) has been carrying announcements of the ongoing growth management comprehensive planning process. Beginning in August, 1995, Channel 8 began running a 25 minute video which described major issues addressed by the Draft Plan and encouraged residents to get involved in the planning process.

Service Club Presentations

To promote community involvement in the development of the Plan, the Mayor, City Councilmembers and staff visited local service clubs (*i.e.*, Chamber of Commerce, Rotary, Lions, and Soroptimists) on a total of ten occasions. These presentations highlighted key issues for community discussion, the major policy recommendations of the Comprehensive Plan Workgroups, and encouraged participation in the planning process.

WHERE THE PROPOSAL FITS IN THE CONTINUUM OF DEIS ALTERNATIVES

Key Land Use Features of the Preferred Plan

As noted in the Preface to this document, the goals, policies, and implementation steps within the Draft Comprehensive Plan embody the "Preferred Alternative." The Draft Plan represents a hybrid between DEIS Alternative #2, Community Neighborhoods (Focussed Growth), and Alternative #3, Urban Community (Concentrated Economic Development).

Like Alternative #2, the Preferred Plan attempts to maintain the City's "small town atmosphere" while absorbing population growth at an annual rate of approximately 2.6%. The Plan is designed to accommodate a population increase of 5,510, and a population total of 13,876 by the year 2016. The specific land use recommendations embodied in the Preferred Plan are briefly summarized below.

[*Note:* The following summary is based upon the text of the Draft Plan as recommended be revised by the Port Townsend Planning Commission. Differences between the population figures cited in the "Description of the Alternatives" discussion above (*see* pages 7-18, above), are the result of revisions to the Joint Regional Population Forecast adopted by mutual agreement between Jefferson County and the City of Port Townsend during the spring of 1996].

Residential Lands

To accommodate the housing needs of Port Townsend's future residents, approximately 3,260 acres (71% of the City's total land base) have been designated on the Preferred Plan land use map for residential use.

Approximately 789 acres (17%) have been designated for lower density development, with single-family residences at a density of up to 4 dwelling units per acre. About 2,143 acres (47%) have been designated for moderate density single-family, with densities of up to 8 dwelling units per acre. Nearly 265 acres (6.0%) have been designated for moderate density multi-family development, with densities up to 16 dwelling units per acre. Finally, about 35 acres (0.8%) have been identified for higher density multi-family development, with densities ranging from 17 to 24 dwelling units per acre.

In some instances, densities exceeding the "base density" could be achieved under the Preferred Plan through the Planned Unit Development (PUD) process. Manufactured homes (*i.e.*, which comply with the HUD Code) could be located in all single-family residential areas, except the National Register Historic District. A significant portion of the land designated for higher density residential development is located in and around the new "mixed use centers" designated by the Preferred Plan.

Mixed Use Lands

In order to foster a wider range of housing types and densities, while at the same time providing greater opportunities for neighborhood and community serving retail businesses and services, the Preferred Plan recommends that approximately 40 acres (1% of the City's total land base) be designated for mixed use development. The land use map identifies four mixed use centers which would be established under the Preferred Plan.

Two of these areas are located at the intersection of arterials, in an effort to provide visibility, a central location, and to enable the mixed use centers to serve as the focal point for established or emerging neighborhoods (*i.e.*, San Juan and F Street; and Hastings Avenue and Howard Street). Because these mixed use centers are located away from the City's established Water Street/Sims Way commercial corridor, the areas have been designated as "neighborhood-serving" mixed use centers, to provide for a compatible mix of small scale commercial uses and medium density multi-family housing in multi-story buildings.

The other two mixed use centers are located nearer to the City's existing commercial areas and the Water Street/Sims Way transportation corridor (*i.e.*, along the east side of Kearney Street from Jefferson to Garfield; and the east and west sides of Discovery Road from 7th to 12th Streets). These areas have been designated as "community-serving" mixed use centers, to accommodate a wider range of general commercial uses which serve a local or City-wide market, along with higher density multi-family residential development in the upper stories of buildings.

Commercial Lands

The proposed land use map which accompanies the Preferred Plan designates 245 acres of commercial land within the City limits. Approximately 40 acres of new commercial land are located within the mixed use centers. A significant portion of the additional remaining commercial acreage is located within the community commercial (C-II) and hospital commercial (C-II(H)) designations. No land within the City limits has been designated for large scale regional retail uses (C-IV). The Preferred Plan land use map suggests that most of the commercial growth will occur in proximity to the Gateway Corridor in the southwestern portion of the City, and along the new Howard Street arterial and in areas south of Discovery Road. Substantial infrastructure improvements will be necessary to serve commercial development in this area, particularly in the form of improvements to transportation corridors.

The Preferred Plan also identifies the adjacent unincorporated Glen Cove area as a potential location for additional commercial land. The County and City, through the Joint Growth Management Committee, have recommended an expanded "community serving" urban growth area in this area which could result in the

designation of additional commercial land. However, additional information and analyses must be completed before the County and City can move forward with the designation of an expanded Port Townsend UGA.

Marine-Related & Manufacturing Lands

The Preferred Plan land use map designates 181 acres of marine-related and manufacturing land within the City limits. Most of the areas proposed to be upzoned are located on the south side of Sims Way west of Thomas Street. Much of the acreage in the new manufacturing designations is located within a new light manufacturing and commercial designation (M/C). The remaining acreage is located at Point Hudson and at the Boat Haven in marine-related designations (M-II(A) - Boat Haven; and M-II(B) -Point Hudson).

The Preferred Plan also identifies the adjacent unincorporated Glen Cove area as a potential location for additional manufacturing land. A considerable area within in Glen Cove is already designated as mixed manufacturing/commercial under the County's zoning code.

Unincorporated Final Urban Growth Area (FUGA)

In total, the Preferred Plan proposes a 182 additional acres of suitably sized and located parcels for mixed use, commercial, and manufacturing development within Port Townsend's corporate limits. Nevertheless, the Preferred Plan acknowledges that additional lands will be needed to serve the forecast population and estimated employment base.

Through the Joint Growth Management Committee (JGMC), the County and City have agreed to assess the feasibility of expanding the Port Townsend FUGA to include portions of the Glen Cove area. An expansion of the Port Townsend FUGA is being considered for a number of reasons:

- Despite the upzones proposed under the Preferred Plan, a shortage of land available for commercial and manufacturing development still exists within the City limits.
- Many of the parcels in town which are available for commercial and manufacturing development tend to be too small and fragmented to support the economic development needed in the community.
- Parcels in the City which are large enough to support commercial and manufacturing development are in many instances unsuitable because they:
 - Encompass environmentally sensitive areas (ESAs) which constrain development; and
 - Tend to be located in areas which are removed from existing regional transportation corridors (*i.e.*, SR 20/Sims Way).
- A significant portion of the Glen Cove area is currently zoned for light manufacturing and commercial uses under the County's zoning code. If urban commercial and manufacturing growth is to continue in Glen Cove, then it should be within the City's FUGA.
- Finally, expansion of Port Townsend's FUGA into Glen Cove will assist in stemming the flow of retail sales leakage to neighboring areas like Silverdale and Sequim, and help promote a more balanced and vital economy in northeastern Jefferson County.

The Preferred Plan indicates that the County and City are coordinating their planning efforts to collect and analyze data, and determine an appropriate FUGA boundary. Additional information and analysis will be needed to refine and modify the conceptual FUGA boundary to ensure consistency with the planning goals and principles of the GMA, as well as recent decisions by the Growth Management Hearings Boards. The Preferred Plan anticipates that Port Townsend's FUGA boundary will be designated either at the time Jefferson County adopts its GMA Comprehensive Plan, or in a subsequent amendment to that Plan.

Public Facility Lands

Although the Preferred Plan land use map does not yet identify additional acreage for public facility land needs, preliminary analysis contained within the Capital Facilities & Utilities Element indicates that acquisition of additional land for public facilities will be necessary. For example, it is likely that the City's existing wastewater treatment plant will need to be expanded to serve the projected population by the end of the 20 year planning horizon. Also, additional land may be needed for a public safety building (*i.e.*, a combined police and fire station facility) within the planning period.

Recreational/Open Space Land Needs

The Preferred Plan land use map identifies approximately 455 acres of land within a potential open space overlay designation. (*Note:* Roughly 103 acres of land have been depicted as mixed public infrastructure/open space - a designation which would serve passive open space functions, while accommodating stormwater and wastewater treatment facilities). The Preferred Plan suggests that a wide variety of regulatory and nonregulatory means be explored in acquiring and developing the City's open spaces and trails system, ranging from conservation easements to outright purchase of key properties.

Finally, the supporting documentation for the Capital Facilities & Utilities Element (Chapter VIII of the Preferred Plan) suggests that there is a shortage of established active recreational areas (*e.g.*, ballparks, kid lots etc.). In an effort to address this deficiency, this Plan anticipates the development of selected existing park lands for active recreational use, as well as the possible acquisition and development of some additional park land.

VII. RESPONSES TO DEIS COMMENTS

COMMENT LETTERS

Jefferson County Planning Department & Department of Public Works



JEFFERSON COUNTY PLANNING DEPARTMENT

Long-Range Planning and Growth Management

Jefferson County Courthouse P.O. Box 1220 Port Townsend, WA 98368
(360) 385-9123 FAX: (360) 385-9357 1-800-831-2678

MEMORANDUM

Date: February 9, 1996

To: City of Port Townsend
540 Water Street
Port Townsend, WA 98368
Attn: Eric Toews

From: Jefferson County Planning Department
Al Scalf, Director of Community Development

Subj: Comments on DEIS Port Townsend Comp Plan

A handwritten signature in black ink, appearing to read "Al Scalf", is written over the "From:" line of the memorandum.

Attached for your information and incorporation into the public record are comments from Jefferson County Departments on the DEIS portion of your Comprehensive Plan.

City of Port Townsend
RECEIVED

FEB 9 1996

Building & Community Development

Enclosures:

Memorandum from Scott Kilmer, Public Works
Resolution 16-96
Letter from Al Scalf, Planning Department



JEFFERSON COUNTY DEPARTMENT OF PUBLIC WORKS

P.O. Box 2070
1322 Washington St.
Port Townsend, WA 98368
(360) 385-9160

Klara A. Fabry, Director/County Engineer

MEMORANDUM

TO: Al Scalf - Planning Department
FROM: Scott Kilmer - Public Works *SK*
SUBJECT: City of Port Townsend Comprehensive Plan
DATE: February 9, 1996

Following are the comments from our review of the Transportation Element of the Draft City of Port Townsend Comprehensive Plan:

1. The map on page VII-4 in the Comprehensive Plan show average daily traffic counts for 1991. In Appendix 5, 1992 counts were used to determine levels of service. These should be consistent with each other.
2. What growth rate is referred to in Table VII-8? (Build only if growth rate exceeds 3%).
3. The goals under "Transportation Goals and Policies" were reviewed and found to be consistent with the Draft Transportation Element of Jefferson County's Comprehensive Plan and the Regional Plan.



JEFFERSON COUNTY PLANNING DEPARTMENT

Long-Range Planning and Growth Management

Jefferson County Courthouse P.O. Box 1220 Port Townsend, WA 98368
(360) 385-9123 FAX: (360) 385-9357 1-800-831-2678

February 9, 1996

Dave Robison, Director
City of Port Townsend
Building and Community Development
540 Water Street
Port Townsend, WA 98368

RE: Preliminary Comments on Draft Port Townsend Comprehensive Plan and DEIS

Dear Dave,

Upon reviewing the proposed City of Port Townsend Comprehensive Plan and integrated DEIS the County Planning Department has the following comments:

#4 [The document appears to fairly thoroughly present goals, policies and implementation strategies in an understandable, coherent fashion.

[The County's review zeroed-in on just how the City's goals, policies and strategies address the issue of *taking on the responsibility* to accommodate the *lion's* share of growth, and to do it in a compact, urban manner.

In order to limit sprawling urban density development throughout the rural and resource lands, the GMA makes clear that incorporated towns and urban growth areas (UGA) accommodate the future urban growth.

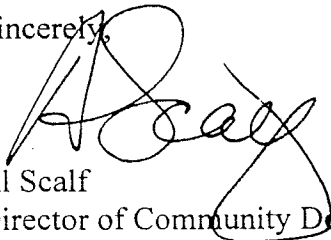
#5 [It appears that the City's draft Plan is based on the assumption that urban growth will be accommodated in more than just one UGA. This is evident throughout the draft Plan and related DEIS. The four alternative Plan *scenarios* (Existing Plan - No Action, Dispersed Growth, Focused Growth, and Concentrated Economic Growth) all are based on the assumption of multiple UGAs in Jefferson County.

[Presently the *only* UGA in Jefferson County is Port Townsend. As such, the GMA requires the City to accommodate all projected *urban* growth. If the City elects not to be responsible for accommodating all of this urban growth but would rather that a substantial amount of urban growth be dispersed into rural areas, then an appropriate analysis needs to be done to justify why all of the projected urban growth

[*cannot* be accommodated within the City limits. This discussion appears nowhere throughout either the draft Comprehensive Plan or DEIS.

#6 [The County would like to see *at least* one other alternative Plan *scenario* added to and discussed within the Plan document and related EIS. This growth scenario should be based on the underlying assumption that Port Townsend will be the only UGA in Jefferson County. As part of this scenario and analysis the City will need to justify why Port Townsend can or cannot accommodate the projected urban growth as required by GMA.

Sincerely,



Al Scalf
Director of Community Development

JEFFERSON COUNTY
State of Washington

1996

IN THE MATTER OF FORMALLY)
DECLARING OPPOSITION TO THE)
CITY OF PORT TOWNSEND PROPOSAL)
TO REDUCE THE TRI-AREA WATER)
SERVICE AREA)

RESOLUTION NO. 16-96

WHEREAS, Jefferson County is continuing to plan under the Growth Management Act for the infrastructure of Tri-Area,

WHEREAS, the City of Port Townsend may be under franchise with the County to provide domestic water service to the Tri-Area,

#7 WHEREAS, the premature reduction in service area or downsizing of the present water service area increase the complexity and uncertainty of the planning process in the Tri-Area,

WHEREAS, the proposed unilateral decision of the City of Port Townsend as a utility provider in the Tri-Area is inconsistent with both the intent and specifics of the Growth Management Act to conduct a comprehensive planning effort to address community needs,

THEREFORE, THE BOARD OF JEFFERSON COUNTY COMMISSIONERS do formally declare their opposition to the City of Port Townsend unilaterally downsizing their Tri-Area Water Service Area outside of the Growth Management Planning process without public participation and opportunity for Jefferson County to ratify such action.

PASSED this 5th day of February 1996.

SEAL:



JEFFERSON COUNTY
BOARD OF COMMISSIONERS

Richard E. Wojt, Chairman

Robert Hinton, Member

Glen Huntingford, Member

ATTEST:

Lorna L. Delaney
Lorna L. Delaney
Clerk of Board

APPROVED AS TO FORM:

Paul E. McIlrath
Chief Deputy Prosecutor

Response to Jefferson County Department of Community Development & Department of Public Works

Comments on the Transportation Element of the Draft Plan and EIS Submitted by Scott Kilmer, Jefferson County Department of Public Works:

1. Comment regarding traffic count data noted. Figure VII-1 on page VII-4 of the Draft Comprehensive Plan and Environmental Impact Statement is informational, and intended only to provide a "snapshot in time" regarding traffic volumes in-City. The traffic count data contained within the Draft Arterial Street Plan (*i.e.*, Draft Plan Appendix #5) was used to determine existing levels of service.
2. Question regarding growth rates noted. Table VII-8 on page VII-31 of the Draft Comprehensive Plan and Environmental Impact Statement refers to the traffic growth rate within Transportation Planning Area "A" (*see* pages 6 and 10 within Appendix #5 - the Draft Arterial Street Plan).
3. General comment regarding Transportation Element goals and policies noted.

Comments on the Draft Comprehensive Plan and EIS Submitted by Al Scalf, Jefferson County Community Development Director:

4. Thank you for your comment.
5. Comments noted. Port Townsend's Draft Comprehensive Plan and EIS was prepared in the context of existing adopted law and policy, including the County-Wide Planning Policy for Jefferson County (CWPP). The CWPP makes clear that Port Townsend is not the only area in Jefferson County which should be considered as being characterized by urban growth (*see* CWPP #1.4).

Moreover, the Joint Population Forecast and Allocation adopted by both Jefferson County and the City of Port Townsend is predicated upon the assumption that more than one urban growth area will be designated in Jefferson County (*see* County Resolution No. 17-96 and City Resolution No. 46-96). Thus, the County's own population forecast and distribution, which presumably is serving as the basis for the preparation of the Jefferson County Comprehensive Plan, is founded on the notion that Port Townsend will not be the County's only urban area. Several relevant portions of the "Summary of Understanding," which outlined the assumptions underpinning the Joint Population Forecast and Allocation, are quoted below to clarify what the County and City have mutually agreed to:

"IV. Port Ludlow Planning Status:

1. Currently, Port Ludlow lies within the 'rural' area of unincorporated Jefferson County, and is not subject to any special planning designation.
2. Consistent with the County-Wide Planning Policy for Jefferson County (CWPP), *Port Ludlow is considered as 'being characterized by urban growth for the purpose of designating UGAs in the unincorporated County'* (CWPP #1.4). (Emphasis added).
3. Under the Growth Management Act (GMA), *'master planned resorts'* may be permitted which *constitute urban growth outside of urban growth areas (UGAs)*. A master planned resort (MPR) means a self contained and fully integrated planned unit development meeting the requirements of Chapter 36.70A.360 RCW, as may be amended. (Emphasis added).
4. Although not currently designated as a MPR, *Port Ludlow will be designated as a MPR or other appropriate urban planning designation consistent with the GMA*

(e.g., UGA) upon initial adoption of Jefferson County's Comprehensive Plan."
(Emphasis added).

[Excerpted from page 2 of the Exhibit "A" to the Summary of Understanding, dated February 6, 1996].

"VII. Tri-Area Planning Status:

1. Currently, all portions of the Tri-Area Planning Area lie within the 'rural' area of unincorporated Jefferson County, and are not subject to any special planning designation.
2. However, consistent with the County-Wide Planning Policy for Jefferson County (CWPP), *the Tri-Area continues to be considered as 'being characterized by urban growth for the purpose of designating UGAs in the unincorporated County'* (CWPP #1.4). (Emphasis added).
3. Upon initial adoption of Jefferson County's Comprehensive Plan, all portions of the Tri-Area Planning Area will be designated 'rural,' in order to promote appropriate densities, intensities and uses.
4. Although initially designated as 'rural,' *Jefferson County may in future amend its Comprehensive Plan to designate portions of the Tri-Area Planning Area as a UGA or other appropriate planning designation consistent with adopted state and local law and policy, as may be amended.*" (Emphasis added).

[Excerpted from page 3 of the Exhibit "A" to the Summary of Understanding, dated February 6, 1996].

It is true that Port Townsend is the County's only de facto UGA at the present time. However, the mere fact that the County has not yet succeeded in completing the analysis necessary to support successful UGA designation of unincorporated areas does not imply that the City must therefore plan to accommodate all urban growth. To summarize, the assumptions regarding the number and location of unincorporated UGAs, which serve as the foundation for the City's Comprehensive Planning efforts, including the alternatives for SEPA review, are consistent with prior agreements between the County and City including the CWPP and the Joint Population Forecast and Allocation.

6. Thank you for your comment. Inclusion of such an alternative is unnecessary. As the response to comment #5 makes clear, existing adopted law, policy and the Joint Population Forecast and Allocation suggest that Port Townsend should not be considered as the only UGA in Jefferson County. It would appear that your suggestion is based, in part, upon the Western Washington Growth Management Hearings Board (WWGMHB) decision in Albert Marshall Loomis, IV vs. Jefferson County (hereinafter referred to as Loomis).

Earlier correspondence from your office (*see* letter of December 4, 1995 to Dave Robison; and letter of December 14, 1995 to Steve Wells) indicates your concern that the Loomis decision poses a number of substantive obstacles to the designation of Port Ludlow as a UGA that are beyond the ability of the County to control. You previously indicated that these obstacles reduced the continued validity of County-Wide Planning Policy 1.4, and that policy 1.4 could no longer be used by the County as a reference for its comprehensive planning process.

As City staff understand it, the Loomis decision simply reaffirms what the Hearings Board has been saying since the summer of 1994: before designating UGAs in the unincorporated County, the County must conduct the necessary studies and show its homework. A number of statements within the Loomis decision support this conclusion:

- a. "We agree with the Central Puget Sound Board's statement in Tacoma vs. Pierce County that UGAs and IUGAs are to initially be drawn at municipal boundaries and then expanded only when *appropriate information and analysis* balanced with the county-wide planning policies and the goals and requirements of the Act are met . . . Jefferson County has failed to comply with the Act by adopting IUGAs outside a municipal boundary without first *conducting an analysis* of and having available for elected officials and members of the *public information on land capacity, fiscal impacts and capital facilities plans* Jefferson County did not comply with the Act because it failed to comply with the Act because it failed to include all aspects of the CPPs in its decision." (Emphasis added). (Loomis at page 1062).
- b. "We stressed in Port Townsend v. Jefferson County . . . and Washington Environmental Council v. Whatcom County . . . that, prior to adoption of any IUGA beyond city limits, a county must perform *a proper planning analysis* of its growth needs and the present and future availability of adequate public facilities and services to meet those needs, as well as planning for the cost of providing such public facilities and services." (Emphasis added). (Loomis at page 1067).
- c. "In order to achieve compliance Jefferson County must repeal this Ordinance within 30 days and *may not extend any IUGA beyond municipal boundaries until requisite analysis has been completed.*" (Emphasis added). (Loomis at 1068).

These statements, when read together with prior Hearings Board decisions, reveal to us that the obstacles to designation of unincorporated UGAs are procedural rather than substantive. Thus, if the required studies and analysis are completed, at least portions of both the Tri-Area and Port Ludlow may be properly considered as UGAs.

To reiterate, we can find no foundation for the County's prior assertions that the requirement to comply with CWPP 1.4 has been obviated. The simple fact that the County has not yet been successful in its efforts to complete the requisite studies and designate unincorporated UGAs does not negate the applicability of CWPP 1.4. It must also be noted that the County has never formally proposed any amendments to the CWPP. Consequently, City staff have concluded that the alternatives to the proposed action included within the DEIS assess are adequate.

7. Jefferson County Board of Commissioners Resolution No. 16-96, (included as an attachment to the comment letter submitted by Mr. Scalf), expressing opposition to the proposed downsizing of the City's Tri-Area Water Service Area, has been noted, and referred to Bob Wheeler, Port Townsend Public Works Director.

Madrona Planning & Development Services on Behalf of DeTarr/Patterson



City of Port Townsend
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FEB 8 1996

February 6, 1996

Building & Community Development

Mr. Dave Robison, Responsible Official
Department of Building and Community Development
521 Water Street
Port Townsend, WA 98368

RE: Comment on the Draft Environmental Impact Statement for the Port Townsend
Comprehensive Plan.

COMMENTS PREPARED FOR THE RECORD AT THE REQUEST OF:

Seiza DeTarr & Howard Patterson
Paul Magid & Rebecca Chace
Tim Furst
The Flying Karamazov Brothers
1891 S. Jacob Miller Road
Port Townsend, WA 98368

OWNERS OF THE FOLLOWING PARCELS:

Legal Description: Parts of Irving Park Addition in Sections 16 & 17, Township 30N,
Range 1W, W.M., and parts of the South 1/2 of the South 1/2 of Section 9, Township
30N, Range 1W, W.M. Jacob Miller Road and Old Discovery Road, Jefferson County,
commonly known as Arcadia Country Inn.

Dear Sir,

This letter is submitted as comment on the proposed inclusion of the above mentioned
properties, also shown on the enclosed Attachment A (Map of Arcadia Properties) within
the Final Urban Growth Area (FUGA) as designated in the Draft City of Port Townsend
Comprehensive Plan.

#1 [The Land Use Map incorrectly shows the path of the minor arterial which starts at Hastings
and Jacob Miller Road and runs southerly, making a sharp (90°) turn to the East, followed
by a sharp (90°) turn back to the South, and meeting Old Discovery Bay Road. The path of
the existing minor arterial Jacob Miller road extends to the South, making a 90° curve to the
east and intersecting with Old Discovery Bay Road. Attached is a detail of the Land Use
Map, which indicates the incorrect path of the current arterial (Attachment B). The arterial

depicted, follows a private driveway. This apparent error is repeated in Figure VII-2, Overall Future Transportation Network.

#2 [The Land Use Map does not include specific parcel information, current zoning information or critical areas overlays, so the extent of the proposed boundary is unclear and the development potential and limitation difficult to assess.

Without specific parcel information, policies about large parcels which are split by the proposed FUGA boundary, and policies which address parcels in contiguous ownership, it is difficult to adequately assess the potential impacts of the proposed FUGA, specifically on potential utility service and transportation system impacts.

#3 [In addition, we are concerned about the discrepancy between the proposed FUGA and the proposed City of Port Townsend Water Service Area. Will specific policies be drafted which allow service providers other than the City of Port Townsend to provide water service within the FUGA, in those areas outside of the Cities Water Service Area?

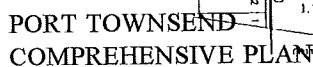
Sincerely,

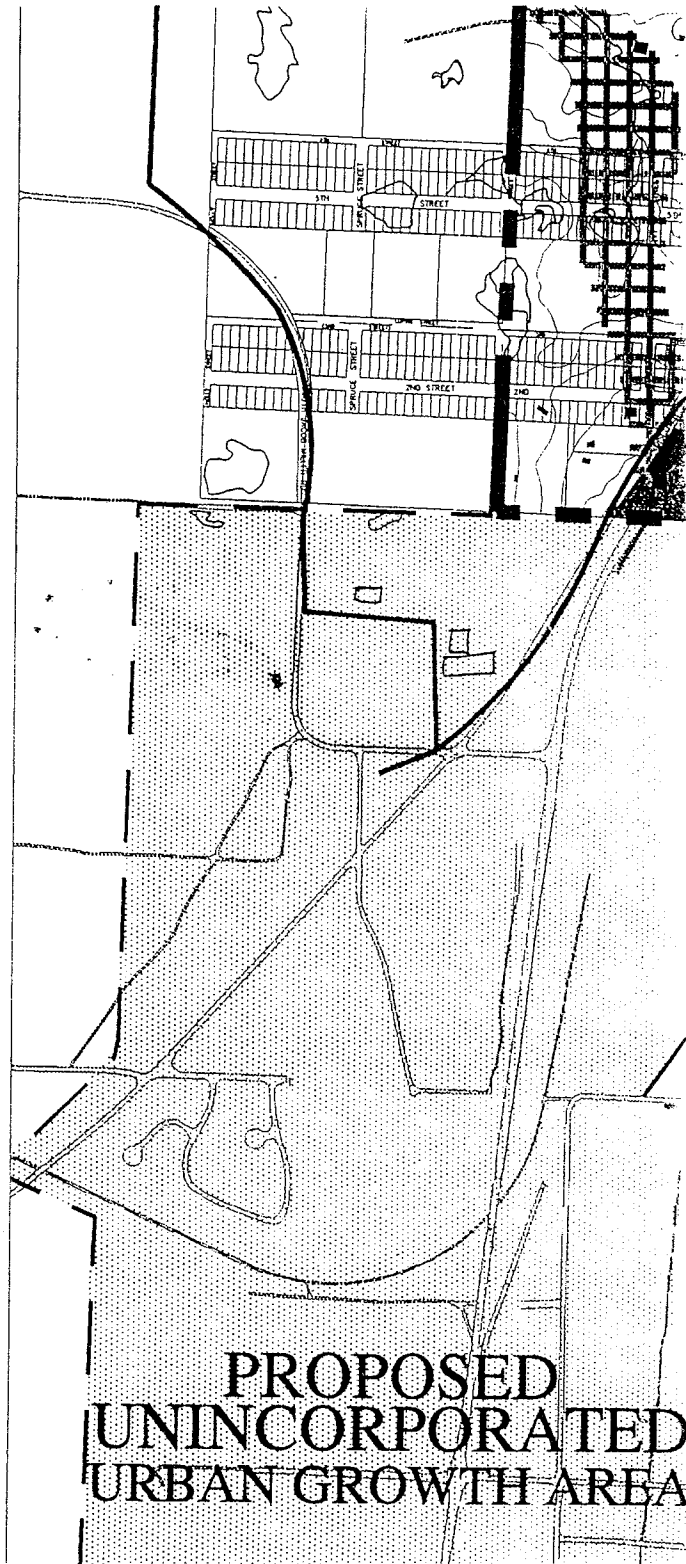


Ande K. Grahn
Associate Planner

AKG:PTCompPlan:Arcadia

$l'' = 200 \text{ ft.}$





**PROPOSED
UNINCORPORATED
URBAN GROWTH AREA**

al /

ise\proposed\public\land90c.dwg

ise\proposed\public\land90c.plt

information contained in this map

of's office. Parcel lines are based on
surveys. Parcel lines have been adjusted to
should not be relied upon for site-specific
property dimensions or land area. No
map feature is either expressed or implied
the City of Port Townsend from any and all
information contained in this map.

Attachment B
Arcadia Properties
Corrected Arterial

City of Port Townsend

540 Water Street
Port Townsend, Washington, 98368
(360) 385-3000

Response to DeTarr/Patterson

1. Comment regarding the Jacob Miller Road alignment noted. The "Preferred Plan" map shown on page 46, above, shows the corrected road alignment.
2. Comments regarding the lack of specific parcel information relating to areas within the proposed unincorporated FUGA have been noted. It should be recognized that the land use map portrays only a conceptual boundary for a FUGA which has yet to be designated by Jefferson County. Additional analysis must be completed before any UGA designation can be implemented. The County and City are developing a workplan for future FUGA designation which contemplates the development of more detailed information, and the preparation of additional environmental documentation.
3. Comments regarding the discrepancy between the proposed FUGA boundary and the proposed Port Townsend Water Service Area are noted. Upon designation, it is possible that the FUGA boundary could also serve as the boundary for the Port Townsend Water Service Area. Areas not designated as part of the FUGA would fall within the rural area of unincorporated Jefferson County. As such, urban level water service could not be provided in these areas in a manner consistent with the requirements of the Growth Management Act (GMA).

Madrona Planning & Development Services on Behalf of Erik Fredrickson



City of Port Townsend
RECEIVED

February 6, 1996

FEB 8 1996

Mr. Dave Robison, Responsible Official
Department of Building and Community Development
521 Water Street
Port Townsend, WA 98368

Building & Community Development

RE: Comment on the Draft Environmental Impact Statements for the Port Townsend Comprehensive Plan.

COMMENTS PREPARED FOR THE RECORD AT THE REQUEST OF:

Mr. Erik Fredrickson
240 Sand Rd.
Port Townsend, WA 98368

OWNER OF THE FOLLOWING PARCEL:

Parcel 001 163 001 in Section 16, Township 30 North, Range 1 West, WM.

Dear Sir,

This letter is submitted as comment on the proposed land use designation of the above mentioned properties, also shown on the enclosed Attachment A (Map of Fredrickson Properties).

#1 [Mr. Fredrickson's property is located in the Glen Cove Industrial Park. The Land Use Map provided with the Draft Comprehensive Plan and Draft Environmental Impact Statement is not of sufficient detail to determine if Mr. Fredrickson's Property has been included.

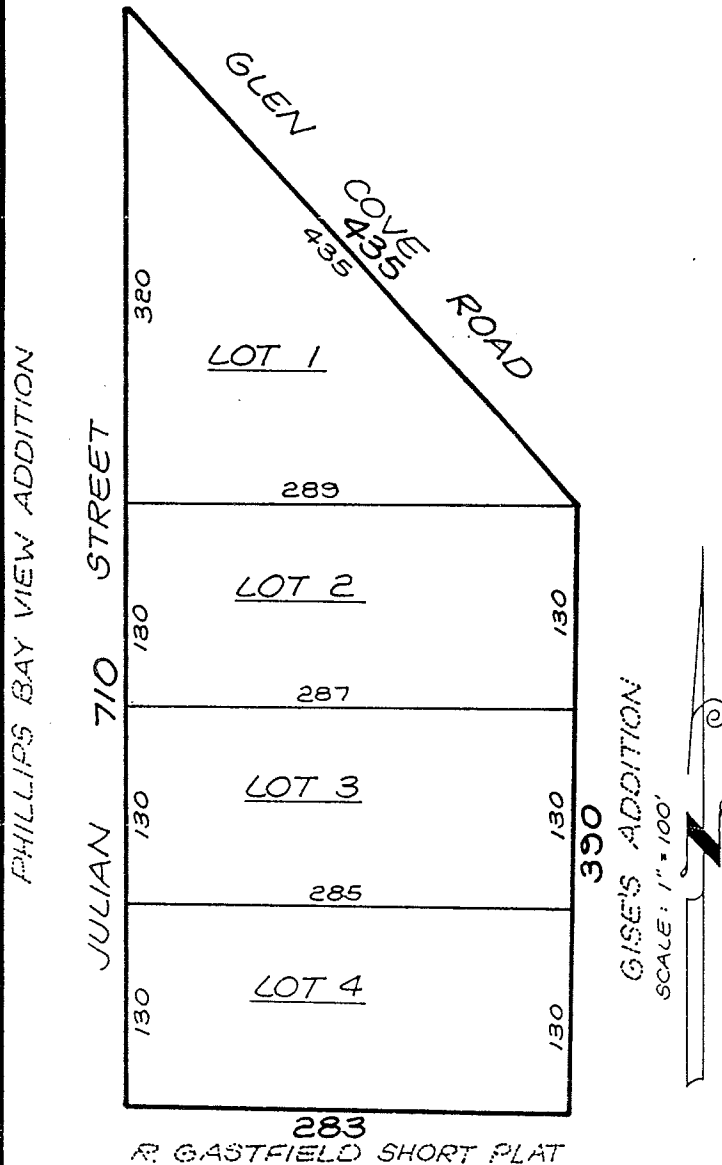
#2 [In addition, it appears that the identified Future Urban Growth Area (FUGA) has been proposed without consideration of existing county commercial zoning and development patterns. We would request that all parcels currently zoned by the County as Light Industrial/Commercial (M/C) be included in the FUGA and appropriate environmental analysis be done for this entire area, including assessment of ability to provide water, fire flow and sewer service, transportation impacts and land use availability.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ande K. Grah", written over a horizontal line.

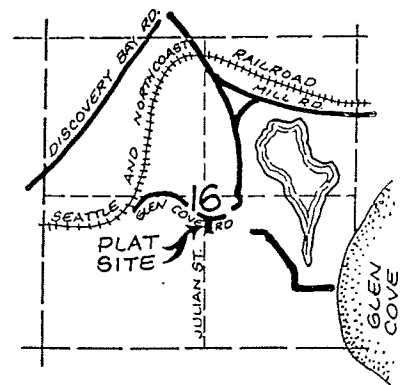
Ande K. Grah
Associate Planner

PRELIMINARY PLAT OF
FREDRICKSON SHORT PLAT
 SECTION 16, TOWNSHIP 30 NORTH, RANGE 1 WEST, W.M.
 JEFFERSON COUNTY, WASH.



Attachment A
 Map of Frederickson Properties

VICINITY MAP
 NOT TO SCALE



DESIGNED BY:
 DRAWN BY: KARENANN HAMMONDS
 PLAT CHECK BY:
 FINAL CHECK BY:



NORTHWESTERN TERRITORIES, INC.

Engineers • Land Surveyors • Planners
 Construction Coordination • Materials Testing

717 SOUTH PEABODY • PORT ANGELES, WASHINGTON 98362 • (206) 452-8491

CITY BLUE PRINT 139713

Response to Erik Fredrickson

1. Comments regarding the lack of specific parcel information relating to areas within the proposed unincorporated FUGA have been noted. It must be recognized that the land use map portrays only a conceptual boundary for a FUGA which has yet to be designated by Jefferson County. Additional analysis must be completed before any UGA designation can be implemented. The County and City are developing a workplan for future FUGA designation which contemplates the development of more detailed information, and the preparation of additional environmental documentation.
2. Comment regarding the consideration of the County's Light Industrial/Commercial (M/C) zoning boundary in the identification of the FUGA boundary has been noted. In point of fact, the conceptual FUGA boundary is substantially similar to the County's M/C zoning boundary. Only the northeastern and northwestern corners of the conceptual FUGA boundary deviate from the County's existing M/C zone boundary. In proximity to Mr. Fredrickson's property east of S.R. 20, the conceptual boundary is identical to the County's M/C zone boundary.

Madrona Planning & Development Services on Behalf of Roger Evans



February 6, 1996

City of Port Townsend
RECEIVED

FEB 8 1996

Mr. Dave Robison, Responsible Official
Department of Building and Community Development
521 Water Street
Port Townsend, WA 98368

Building & Community Development

RE: Comment on the Draft Environmental Impact Statements for the Port Townsend Comprehensive Plan.

COMMENTS PREPARED FOR THE RECORD AT THE REQUEST OF:

Mr. Roger Evans
4545 Sand Point Way NE, Suite 706
Seattle, WA 98105

OWNER OF THE FOLLOWING PARCELS:

That portion of Tax 16 & Tax 9 lying south of SR 20 and all of Tax 6,
Southeast 1/4 of Section 9, Township 30 North, Range 1 West, W.M.

Dear Sir,

This letter is submitted as comment on the proposed land use designation of the above mentioned properties, also shown on the enclosed attachment A (Map of Evans Properties).

#1 [As you know, this parcel is subject to a vested land-use application for residential development. This parcel has also been subject to environmental review during a Type IV Forest Lands Conversion application, which assessed the environmental impacts of conversion to residential uses. Since it is clear that the owner has a valid application for residential use of the subject property, concerns are raised about the adequacy of the land use analysis in regards to providing sufficient M/C (Mixed Light Manufacturing & Commercial) designated land to meet the 20 year needs of the City.

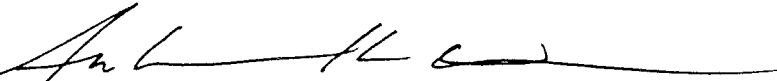
#2 [In addition, we would suggest that the subject parcel is not appropriate for a M/C (Mixed Light Manufacturing & Commercial) designation due to the voluntary dedication to the City of Port Townsend of a one hundred foot buffer strip, to implement the Gateway Plan, which restricts visibility and access to the site from the major arterial, SR 20. There are other constraints which make this property less than desirable for light manufacturing

users, including a small wetland, a drainage corridor in the Howard Street Right-of-way, the presence of steep slopes, and other topographical constraints.

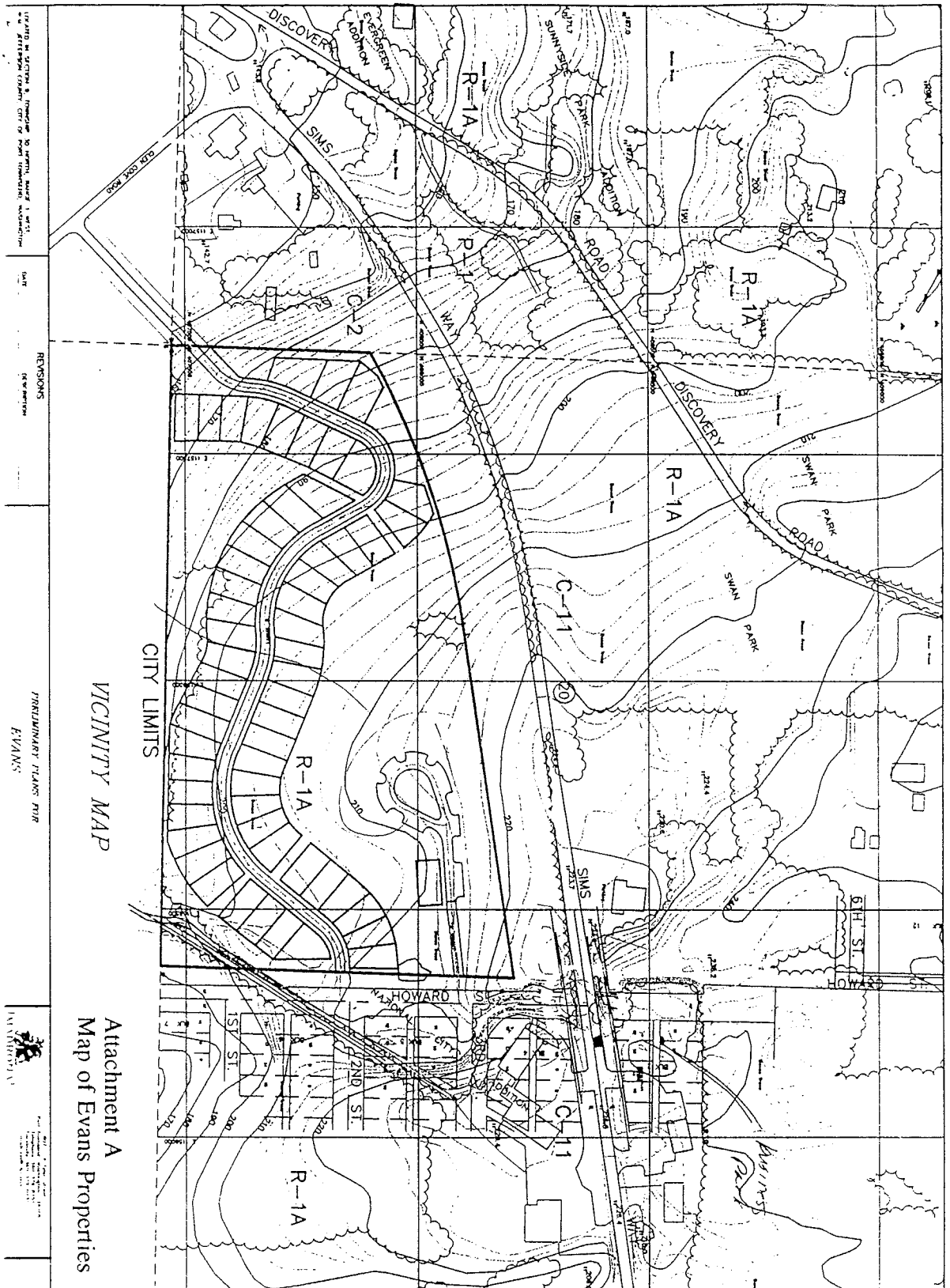
#3 [As you are aware, M/C (Mixed Light Manufacturing & Commercial) is typically located on flat land, easily accessed to a major arterial. Mill Road is already subject to heavy industrial traffic. The accesses from Mill Road and from Howard Street are not suited to intensive light industrial and/or commercial type traffic. We note that your Transportation Element, Figure VII-2, Overall Future Transportation Network, does not continue the designation of Howard Street south of Sims as a minor arterial.

#4 [We would request that consideration and analysis be made with regards to providing sufficient suitable land in the Glen Cove area to accommodate the M/C (Mixed Light Manufacturing & Commercial) needs identified in the Comprehensive Plan and that the above properties be included in the analysis of residential buildout, consistent with the referenced land use application.

Sincerely,



Ande K. Grahn
Associate Planner



Response to Roger Evans

1. Comments regarding the status of the land use application for the subject parcel are noted. Mr. Evan's parcel is, in fact, not subject to a vested land-use application for residential development. The application was originally submitted on July 17, 1995. Subsequently, Port Townsend Building and Community Development (BCD) staff requested additional information on August 25, 1995. The applicant responded by providing some, but not all, of the requested information. On April 18, 1996, BCD staff again requested the needed information, and are still awaiting a response from the applicant.

Additionally, the SEPA review conducted for the Forest Practice Application (FP02-13601) indicated explicitly that the threshold determination was only for logging activities, not for the proposed planned unit development (*see* the Determination of Nonsignificance and Lead Agency Status issued on August 5, 1993). Thus, the environmental impacts of conversion to residential uses have not yet been assessed.

2. The dedicated 100' buffer strip along Sims Way which restricts the visibility to and from the parcel should in no way interfere with a M/C zoning designation. The intent of the designation is to provide land for light manufacturing uses which may also accommodate some subordinate commercial activities, provided they involve the retailing of goods made principally on-site. Thus, retail commercial activities which may depend upon visibility, are not contemplated as a dominant use within the M/C district.

With respect to the possible environmental constraints on this site, please recognize that site-specific environmental review of specific land use applications will appropriately factor any drainage corridors, steep slopes, and wetland areas.

3. Because of the noise, odors, dust and vibration typically associated with industrial uses, the subject area is viewed as being uniquely well-suited for the M/C designation. The parcel abuts a state highway (S.R. 20), which could be accessed through improvements to Howard Street south of the highway.
4. Your request has been noted. As your comment suggests, the County and City are assessing the possibility of expanding the limits of the Port Townsend UGA to include portions of adjacent Glen Cove area of unincorporated Jefferson County. However, under the GMA, this possible expansion can be supported only if the available commercial and manufacturing land within Port Townsend's corporate limits is insufficient to meet the projected 20 year needs of the community.

In order to ensure that a future UGA designation is successful, the City has a responsibility to first identify and designate lands suitable for commercial and manufacturing uses within its municipal boundaries. Because your application for residential development has not yet vested, application of a residential land use designation to the parcel would be inappropriate, and would only increase the City's residential land surplus. Should your application vest before the City's revised zoning code implements the M/C designation of the Comprehensive Plan map, a residential PUD would clearly be permissible. However, if vesting does not occur, it is appropriate that a M/C, light manufacturing/commercial designation prevail.

Finally, please be advised that the Planning Commission has recommended to the City Council that your parcel be designated for single-family residential use (R-II). However, the City Council may change the recommendations of the Planning Commission during its review of the Comprehensive Plan.

Department of Fish & Wildlife



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

February 5, 1996

City of Port Townsend
ATTENTION: Dave Robison
Building and Community Development Department
540 Water Street, Washington 98368

**SUBJECT: Draft Environmental Impact Statement - City of Port
Townsend Proponent - Draft City of Port Townsend
Comprehensive Plan - Port Townsend Bay/Strait of Juan De
Fuca, Jefferson County, WRIA 17.MARI**

Dear Mr. Robison:

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced Draft Environmental Impact Statement received on January 15, 1996 and offers the following comments at this time. Other comments may be offered as the project progresses.

#1 [Authority for WDFW to protect fish life was established by the State Legislature (RCW 75.20.100, 75.20.160). However, our ability to protect fish and shellfish and their habitats is often limited since habitat conditions are affected in large part by upland processes and disturbances generally beyond our direct regulatory authority. We must, therefore, rely on local government to assist us in protecting fish and shellfish habitat through development and implementation of long range plans including regulations to protect critical areas and habitats. We recognize that local governments must plan for and accommodate growth. This growth is due, in large part, to a recognition and appreciation of the State's many and varied natural resources, including salmon, marine fish, and shellfish, and the quality of life they foster. As tenants of these valuable natural resources, citizens within the city/town bear responsibility for ensuring the preservation in perpetuity of the fish and shellfish resources produced within this area of the marine waters of the state.

#2 [WDFW is anxious to work with the City of Port Townsend to ensure that these resources are protected. We hope to provide information that will benefit you and your staff in your efforts to develop a meaningful and effective regulatory package. In the current climate of regulatory reform, every effort should be taken to establish regulations that reflect a consistent approach to natural resource protection between local and state agencies with jurisdiction.

PORT TOWNSEND
COMPREHENSIVE PLAN

Additional Comments - Biological Resources & Habitat

WDFW is concerned about adverse impacts to all marine habitats in the City of Port Townsend. However, the marine habitats that are of special concern to WDFW are those habitats that serve an essential function in the developmental life history of food fish or shellfish. These habitats include:

1. Nearshore shallow water habitat is critical to the survival of juvenile marine fish and juvenile salmonids during their spring outmigration. This habitat includes all beaches and beds of marine and estuarine waters of the state from ordinary high water waterward to -10.0 feet (Mean Lower Low Water = 0.0 feet). This habitat is important as a migration corridor, producer of food, and serves as a refuge from predation.
2. Surf smelt (*Hypomesus pretiosus*) spawning beds are located in the upper beach area containing sand and/or gravel bed materials on documented stretches of beach around the state. The Port Townsend Bay area has just recently become documented as a year round surf smelt spawning area; spawning occurs on almost all of the shorelines of the City of Port Townsend, including the beach in Fort Worden facing the Strait of Juan De Fuca.
3. Pacific sandlance (*Ammodytes hexapterus*) spawning beds are located in the upper and middle beach area containing sand and/or gravel bed materials on documented stretches of beach around the state. Specifically, the City of Port Townsend waterfront area includes new areas that have been documented as spawning habitat for sandlance. These areas include the area immediately adjacent to each end of the Point Hudson Marina, the Glen Cove area, and down as far as Port Hadlock.
4. Rock sole (*Lepidopsetta bilineata*) spawning beds are located in the upper and middle beach in areas containing sand and/or gravel bed materials on documented stretches of beach around the state.
5. Pacific herring (*Clupea harengus*) spawning beds are located in the lower beach and shallow subtidal in areas containing eelgrass (*Zostera* spp), other saltwater vegetation, and/or gravel bed materials in documented marine areas around the state. Herring do not spawn immediately near the City of Port Townsend, but spawning does occur on the Kilisut Harbor side of the Bay.

- #3
6. Rockfish (*Sebastes* spp) and lingcod (*Ophiodon elongatus*) settlement and nursery areas are located in kelp beds, eelgrass (*Zostera* spp) beds, other saltwater vegetation, and other bed materials in documented marine areas around the state.
 7. Eelgrass (*Zostera* spp) and Kelp (Order Laminariales) are found in the lower intertidal and shallow subtidal areas around the state. Eelgrass beds are abundant in Port Townsend Bay, close to the waterfront.
 8. Intertidal wetland vascular plants (except Noxious weeds) occur in the intertidal areas around the state. These plants provide both substrate for the production of preferred food organisms and shelter from predators for rearing juvenile marine fish and juvenile salmonids during their spring outmigration. These plants also provide both ground water recharge and help maintain water quality through biofiltration.

#4

WDFW habitat policy (POL-410) for all marine habitats including those of special concern, adopted September 1990, states "... it is the goal of WDFW to achieve no net loss of the productive capacity of the habitat of food fish and shellfish resources of the state." This policy requires applicants of projects potentially impacting fish resources and habitat to mitigate all adverse effects. Applicants must first take all reasonable steps to avoid habitat damage, and second, take all reasonable steps to minimize any unavoidable habitat damage. Any habitat which is unavoidably damaged or lost must be replaced to its full productive capacity using proven methods.

WDFW has identified the following development activities which could adversely affect the above-identified marine habitats. Since the inception of development along the shores of Puget Sound, food fish and shellfish habitat has been lost due to impacts associated with urban and industrial development. These impacts have reduced the reproductive potential of those species dependant on these habitats for spawning. They have reduced the area available for juvenile marine fish and juvenile salmonids to rear, feed, and migrate. And they have reduced the area available for juvenile salmonids to physiologically adapt from fresh to saltwater.

BULKHEADS AND BANK PROTECTION

#5

Construction of bulkheads or other bank protection below the ordinary high water line (OHWL) can result in the direct loss of marine habitat. These impacts can include the loss of: spawning habitat, shallow water habitat, food production, wetland vascular plants, and riparian vegetative cover. The natural geohydraulic

system (including feeder bluffs, littoral drift corridors, and accretion beaches) provides the spawning substrate for surf smelt and sandlance and the upper intertidal beach topography that comprises the juvenile salmonid migratory corridor. The construction of bulkheads adjacent to feeder bluffs can indirectly impact surf smelt and sandlance by starving the associated accretion beach of substrate resulting in beach erosion and loss of spawning habitat.

#5 In addition, the construction of bulkheads hardens the bank and reduces natural beach roughness. This can result in erosion along the littoral drift corridor by accelerating the rate of drift and by increasing wave energy waterward of the bulkhead. The resultant beach instability can reduce available spawning habitat for surf smelt and sandlance and adversely impact the production of juvenile salmonid food organisms.

The proliferation of bulkheads, many of which are located below OHWL and may not be necessary for erosion control, contributes to serious cumulative impacts to fish resources throughout Puget Sound. The most significant of these impacts is the loss of spawning habitat. Modification and loss of rearing habitat are similarly important impacts resulting from bulkhead encroachment below OHWL. Cumulatively, these can result in lower survival of juvenile fish and therefore reduced contribution to sport and commercial fisheries and the adult spawning populations.

WDFW recommends that steps be taken in development planning such that, in the future, it will not be necessary to construct bulkheads or other bank protection to protect structures abutting the shoreline. The city/town should require that a thorough geotechnical analysis of on-site slope stability be undertaken to establish the annual rate of bankline and bluff erosion. This annual erosion rate should be projected over the life expectancy of the structure and should be added to a minimum horizontal buffer of approximately 50 feet.

#6 Existing native vegetation within the erosion and buffer zones should be maintained and the building setback should be established landward of the buffer. Surface water drainage should be directed upland, away from erodible slopes, before collection and conveyance. Installation techniques should minimize disturbance to the slopes and vegetation and disturbed areas should be revegetated immediately.

WDFW recommends that new bank protection be designed and constructed utilizing the least impacting alternative. This can be accomplished by using a bio-technical approach. This approach

Dave Robison
February 5, 1996
Page 5

utilizes technology incorporating coastal zone processes, integrated with the principals of erosion, soil bioengineering, and bio-technical engineering to achieve slope stability.

For the purpose of maximizing both protection of sensitive marine shoreline habitats and maximizing consistency between agencies with jurisdiction over marine shoreline development, WDFW requests that the City of Port Townsend adopt the following regulations for residential bulkhead construction. These regulations are consistent with RCW 75.20.160

1. The waterward face of a new bulkhead or rockwall shall be located only as far waterward as is necessary to excavate for footings or place base rocks for the structure and under no conditions shall be located more than 6 feet waterward of the ordinary high waterline.
2. Any bulkhead or rockwall to replace or repair an existing bulkhead or rockwall shall be placed along the same alignment as the bulkhead or rockwall it is replacing. However, the replaced or repaired bulkhead or rockwall may be placed waterward of and directly abutting the existing bulkhead or rockwall would result in environmental degradation or removal problems related to geological, engineering, or safety considerations.
3. Construction of a new bulkhead or rockwall or replacement or repair of an existing bulkhead or rockwall waterward of the existing structure shall not result in the permanent loss of the following critical food fish or shellfish habitats:
 - A. Eelgrass (*Zostera* spp).
 - B. Surf smelt, Pacific sandlance, or rock sole spawning beds.
 - C. Kelp (Order Laminariales).
 - D. Intertidal wetland vascular plants.
 - E. Juvenile salmonid migration corridors, and rearing and feeding areas.

Bulkheads and bank protection for non-single family residences should be consistent with WDFW Habitat Policy. WDFW requests that the City of Port Townsend adopt the following regulations for non-residential bulkhead construction consistent with this policy. These regulations are contained in WAC 220-110:

- #6
1. Bulkheads and bank protection should incorporate mitigation measures to achieve no net loss of the productive capacity of fish and shellfish habitat.
 2. The waterward face of a new bulkhead or other bank protection should be designed and constructed utilizing the least impacting type of structure and should minimize encroachment below the ordinary high water line and the attendant permanent loss of marine habitat.
 3. Repairs to or replacement of an existing functioning bulkhead or other bank protection should also utilize the least impacting alternative type of construction and method of construction and should minimize further waterward encroachment and the attendant permanent loss of marine habitat.
 4. Bulkheads and bank protection should not be constructed in eelgrass (*Zostera* spp).
 5. Bulkheads and bank protection should not result in the permanent loss of surf smelt, Pacific sandlance, or rock sole spawning beds.
 6. Kelp or intertidal wetland vascular plants (except noxious weeds) adversely impacted due to the construction of bulkheads and bank protection should be replaced using proven methodology.

LITTORAL DRIFT OF SEDIMENTS

#7

The City of Port Townsend should examine the movement of sediments along the marine shorelines. Projects should avoid interruption of the littoral drift process which is important for maintaining habitat in the intertidal area. Also areas of shoreline that deposit necessary sediments onto the beach that are then carried by the littoral drift process should be maintained in their natural state. The most critical of these areas are the "feeder bluffs". There are currently several projects that may be currently affecting or have the potential to adversely affect beach feeding and littoral drift. These include; 1) The proposed 1100 foot bulkhead at Fort Worden State Park 2) The pier facility at Fort Worden 3) The Port Hadlock Boat Launch sediment control system. An analysis of sediment movement within the City could provide information on the impacts of bulkheads, boat ramps, piers, berms, etc.

URBAN WATERFRONT RENOVATION

#8 [In those instances where existing structures are to be demolished prior to redevelopment, bulkhead or other bank protection repair or replacement should be undertaken following demolition, and prior to new construction. The bulkhead or other bank protection can then be repaired or replaced in the same location as the existing structure. Structural integrity of foundations during building restoration should be addressed before construction. Creosote treated piles should be replaced with steel, concrete or recycled plastic piles. Adding to the foundation by expanding a supporting bulkhead should minimize further waterward encroachment and the attendant permanent loss of marine habitat.

OVERWATER AND FLOATING STRUCTURES

Information synthesized from recent studies indicates that the shadow cast by overwater and floating structures, as narrow as eight feet in width, located in the intertidal and shallow subtidal habitats can result in the loss of important marine vegetation, such as eelgrass. This shadow can also reduce the productivity of food organisms important to juvenile salmonids and marine fish. In addition, this shadow disrupts juvenile salmonid migration along the shoreline. These small fish avoid dark areas under overwater and floating structures, and are forced offshore into deeper waters where they are more susceptible to predation. Finally, fish that prey upon juvenile salmonids are attracted to the habitat provided by overwater and floating structures.

#9 [For the purpose of maximizing both protection of sensitive marine shoreline habitats and maximizing consistency between agencies with jurisdiction over marine shoreline development, WDFW requests that the City of Port Townsend adopt the following regulations for overwater and floating structures. Many of these regulations are contained in WAC 220-110:

1. Floating structures should not ground on surf smelt and Pacific sandlance spawning beds.
2. Overwater and floating structures, and their associated moorings should be designed and located to avoid shading of eelgrass (*Zostera* spp).
3. Overwater and floating structures should also be designed and located to avoid adverse impacts to salmonid migratory routes and rearing habitats.

- #7
4. Kelp (Order Laminariales) and/or intertidal wetland vascular plants (except noxious weeds) adversely impacted from the construction of overwater and floating structures should be replaced using proven methodology.
 5. Overwater structures should be built perpendicular to the shoreline and overwater structures parallel to the shoreline, such as boardwalks, should not be permitted.
 6. Overwater and floating structures should incorporate mitigation measures, including but not limited to, restrictions on structural width and/or incorporation of materials that allow adequate light penetration (i.e. grating), for structures located landward of -10.0 feet Mean Lower Low Water (MLLW).
 7. Floation should be enclosed and contained to prevent the breakup or loss of the floatation material into the water for the life of the structure.
 8. No more than 20% of the floating structure within the beach area should ground at any time. Those portions of the structure that will ground should be constructed to align parallel to the shore and provide a minimum of eight (8) inches clearance between the beach area and the non-grounding portion of the structure.

The City should examine all existing floatation and require an upgrade if necessary to meet the requirements of 7 above.

Usage of Creosote and Treated Woods

WDFW, Department of Ecology (DOE), Department of Health, Department of Natural Resources, and several local jurisdictions are concerned about the use of creosote and other wood preservatives in the aquatic environment.

#10

In particular, WDFW is concerned about adverse effects on fin fish, shellfish, benthic and epibenthic invertebrates, marine vegetation, etc., from the use of pilings treated with creosote and other wood preservatives in the aquatic environment. Although creosote treated wood is not currently regulated as a dangerous waste, some used creosote piles are classified by the Department of Ecology as an extremely hazardous waste for acute toxicity and persistence. For disposal, these piles must be taken to a lined leachate collection disposal site.

#10 A major portion of creosote is comprised of a variety of chemical compounds known as polycyclic aromatic hydrocarbons (PAHs). Creosote pilings in saltwater leach PAHs. As much as 20% or more of a piling's creosote leaches into the surrounding waters. Since 50 to 100 gallons of creosote are used in the typical piling depending on the piling size and level of treatment, the amount leached can be significant. About 2/3 of the PAHs released are adsorbed to bottom sediments and persist. If dredging in the future becomes necessary, sediments thus contaminated with PAHs may become ineligible for unconfined in-water disposal, requiring disposal in expensive lined landfills. Most fishes metabolize PAHs, however, intermediate breakdown products can be extremely carcinogenic to a wide variety of organisms (including fish). Epidermal tumors and liver lesions in flatfishes are two examples of cancerous effects which have been directly related to high PAH levels in sediments. Other PAHs exhibit significant acute toxicity to aquatic organisms but are non-carcinogenic. PAHs can cause adverse effects at numerous biological levels including enzymatic and immunological changes, tissue damage, direct mortality, and community alteration. Bivalves (eg. mussels and oysters) do not metabolize PAHs. High tissue concentrations have been found in these organisms in association with PAH contaminated substrate (piles and sediments).

Because of the above-identified effects of PAHs on the environment, their sources should be reduced or eliminated wherever possible. Preferred non-toxic alternatives to creosote include concrete, steel, or recycled plastic piles. The additional cost of these alternatives can be offset by their benefits. These include: longer product life, increased structural support capability, reduced disposal costs, lower costs of driving, and fewer piles. WDFW recommends that these alternatives be utilized to reduce adverse effects on fish life.

DREDGING

Dredging in intertidal or subtidal areas may result in significant adverse environmental impacts. Projects should be designed so that dredging is never required.

#11 Unavoidable impacts to fish and shellfish resources and their habitats from dredging projects will require mitigation. Mitigation for damage to these habitats is usually difficult and expensive. Therefore, it is generally better to minimize any unavoidable habitat damage.

WDFW requests that the city/town adopt the following regulations for dredging for the purpose of maximizing both protection of sensitive marine shoreline habitats and maximizing consistency between agencies with jurisdiction over marine shoreline development. Again, many of these regulations are contained in WAC 220-110:

- #11
1. Maintenance dredging should be limited to the original dredge footprint, the original dredge depth. Documentation of the date of previous dredging should be provided.
 2. Dredging should not take place in eelgrass (*Zostera* spp).
 3. Kelp (Order Laminariales) adversely impacted from dredging should be replaced using proven methodology.
 4. Dredging should be conducted with dredge types and methods that cause the least adverse impacts to fish and shellfish and their habitat.
 5. Dredging projects should incorporate mitigation measures to achieve no net loss of production capacity of fish and shellfish habitat.

STORMWATER

#12

One of the major impacts of development adjacent to marine waters is the introduction of fine grained sediments and pollutants such as oils, heavy metals, phosphates, etc., into marine receiving waters from roadways, parking lots, and other impervious surfaces greater than 5000 square feet in area. This run-off and the pollutants it contains can adversely affect fish life by filling estuarine and nearshore rearing and spawning habitats, by covering up eelgrass beds, by changing invertebrate and vertebrate species diversity and abundance, and by contaminating important recreational, subsistence, and commercial shellfish beds.

In order to protect water quality affecting fish resources and marine habitats, stormwater run-off must be treated. WDFW requests that the city/town adopt regulations requiring that stormwater be treated utilizing methods appearing in the Stormwater Management Manual For the Puget Sound Basin, produced by The Department of Ecology, Water Quality Program.

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In the winter of 95, the incidence of slope failures were much higher than normal, the majority of these failures can be directly attributed to clearing land for development, or opening view corridors. Land clearing activity for these reasons usually results in increased erosion which eventually becomes a bulkhead.

BOAT RAMPS

Construction of solid concrete boat ramps results in many of the above-identified adverse impacts to critical nearshore shallow water fish and shellfish habitat. WDFW, therefore, requests that the City of Port Townsend adopt the following regulations that minimize such impacts. Some of these regulations are contained in WAC 220-110:

- 13
1. Boat ramp construction should be limited to municipal concrete boat ramps with a prohibition on residential ramps.
 2. Residential boat launches should be limited to railway-types, that are designed to cause minimal interference with tidal currents and littoral drift.
 3. Boat ramp projects should incorporate mitigation measures to achieve no net loss of the productive capacity of fish and shellfish habitat. In the case of Port Hadlock Boat Launch that is run by the Port of Port Townsend, the launch ramp directly impacts sand lance habitat. In cases such as the Port Hadlock ramp, they should be elevated above the bottom to allow sediment movement without interruption, and eliminate the need for cleaning.
 4. Boat ramps should not be constructed in surf smelt, or Pacific sand lance spawning beds or in eelgrass (*Zostera* spp).

The City of Port Townsend is responsible for the maintenance of the Port Hadlock Boat Launch facility. In an effort to control sediment covering the Port Hadlock Boat Launch, a berm was constructed in addition to an upper beach enhancement. Recent site inspections have shown that these projects have not achieved the intended goal of controlling sediment movement. WDFW prefers that the berm structure be removed to restore sediment movement toward the spit. The idea of an alternative boat ramp design should be explored with the Port of Port Townsend that might elevate the ramp. If practicable, this would allow littoral drift of sand toward the spit to continue and reduce maintenance of the ramp.

Dave Robison
February 5, 1996
Page 12

MARINAS AND MOORAGE FACILITIES

#14 The above comments on bulkheads and bank protection, overwater and floating structures, creosote and treated wood, dredging, stormwater, and boat ramps apply to marinas and moorage facilities. In addition, shellfish harvest prohibited zones are established around all marinas on a case by case basis. Commercial shellfish harvesting is prohibited inside these zones. New or expanded marina construction should not result in an expansion of this prohibited zone.

WDFW requests that the City of Port Townsend adopt the following regulation for marinas, consistent with WAC 220-110:

1. New marinas should be constructed so as to achieve no net loss of productive capacity of fish and shellfish habitat.

UTILITIES (INCLUDING SEWAGE TREATMENT PLANTS AND SEPTIC SYSTEMS)

Pollution from sewage treatment plant (STP) outfall effluent and failed or dysfunctional septic field systems contributes to water quality problems and can adversely impact marine habitat. Maintenance of good marine water quality is extremely important to shellfish production. The marine waters of Puget Sound are important producers of shellfish that are harvested for recreational, subsistence and commercial purposes. Shellfish decertification is a significant issue relative to point sources of pollution such as STPs. Significant decertification of shellfish resources including oysters, geoducks, and other hardshell clams has occurred due to the location of existing STP outfalls in proximity to these resources.

#15 In addition, many of the upland areas adjacent to marine shorelines contain very shallow native permeable soils and tight underlying soils, such as clay. Septic field sewage systems in areas containing these soils often have a high failure rate. Effluent from such systems frequently results in contaminated shellfish, shellfish decertification, and potential human health risk. Unless adequate measures are taken to reduce point and non-point pollution, adverse impacts to marine resources and marine habitats will be greatly exacerbated in the future as growth in the region is expected to increase.

Avoidance of such impacts is of extreme importance to WDFW. All feasible alternatives should be investigated where the location of an STP outfall would be the primary reason for harvest restrictions. Alternatives should include upland disposal of the treated wastewater such as reuse, constructed treatment wetlands,

upland storage lagoons, with spray land application, and locations of marine outfalls where the effluent zone of influence will not result in harvest restrictions. Sewage treatment plant (STP) outfalls should be located so that their effluent zones of influence will not condition, restrict, or prohibit harvest of shellfish from any known or as yet to be discovered commercial or recreational bed.

#15 WDFW feels potential adverse impacts to shellfish and finfish resources from non-point sources of pollution, such as failing septic systems, should be thoroughly investigated by the local jurisdiction. These investigations should include a critical review of approved soil perk criteria, septic system design criteria, and construction regulations by the county and the Washington Department of Health. The local jurisdiction should also require a greater factor of safety for new systems, including regularly scheduled maintenance and function inspections.

WDFW requests that the City of Port Townsend adopt the following regulations for utility projects, consistent with WAC 220-110:

1. Utility line projects should incorporate mitigation measures to achieve no net loss of the productive capacity of fish and shellfish habitat.
2. Excavation for utility line placement should not take place in eelgrass (*Zostera spp*).
3. Kelp (Order Laminariales) adversely impacted due to excavation or installation activities should be replaced using proven methodology.
4. Excavation for and installation of cables, sewer lines, and other utilities should be conducted with equipment and techniques that minimize adverse impacts to fish and shellfish and their habitats.

POLICY 14.7

#16 The "Takings" issue was a major concern of Washington State voters this past November. As a regulatory agency, WDFW is trying to address regulatory reform without the need for compensation such as this, making it difficult and costly for the City of Port Townsend to administer. The City should consider the ramifications of this policy before placing it into the Comprehensive Plan.

Dave Robison
February 5, 1996
Page 14

We appreciate your cooperation in our efforts to protect, perpetuate and manage the fish resources of the state of Washington.

Thank you for the opportunity to provide these comments. If you have any questions please call me at (360) 895-4757.

Sincerely,

R. Timothy Flint for

John Boettner, Area Habitat Biologist
Habitat Program

jb:20:Feb96

cc: Dave Gufler, WDFW Region 6
Tim Flint, WDFW
Barbara Ritchie, DOE
Jane Banyard, WDFW

Response to Department of Fish & Wildlife

1. Comment noted. Because of the City of Port Townsend's commitment to the preservation of valuable habitat areas and water quality, goals and policies intended to safeguard these resources have been incorporated within the Draft Plan and DEIS.

Specifically, the Land Use Element contains goals and policies intended to protect the City's environmentally sensitive areas for present and future generations (*see* page V-26 of the Draft Plan and DEIS). The Land Use Element also contains goals and policies designed to manage surface, ground, storm waste, and coastal waters to ensure that water resources are protected and preserved (*see* pages V-29 and V-30 of the Draft Plan and DEIS). Finally, the Stormwater Utility goals and policies contained in the Capital Facilities & Utilities Element are intended to control both the quality and quantity of stormwater runoff, particularly into the marine waters adjacent to Port Townsend.

2. The City of Port Townsend looks forward to working with the Department of Fish and Wildlife to ensure that our State's valuable marine resources are protected.
3. Your concerns have been noted.
4. Your comment has been noted.
5. Your comments regarding the impacts of bulkhead and bank protection devices on marine habitat have been noted.
6. Thank you for your recommendations regarding construction in areas abutting Port Townsend's shorelines. Your specific regulatory recommendations will undoubtedly be useful during the process of revising Port Townsend's Municipal Code to implement the City's new Comprehensive Plan.
7. Your comments regarding the potential impacts of project actions upon the littoral drift of sediments have been noted.
8. Your comments and recommendations regarding future project actions involving urban waterfront renovation have been noted.
9. Your comments and recommendations regarding future project actions involving overwater and floating structures have been noted. Your specific regulatory recommendations will undoubtedly be useful during the process of revising Port Townsend's Municipal Code to implement the City's new Comprehensive Plan.
10. Your comments and recommendations regarding future project actions involving the use of creosote and treated woods have been noted.
11. Your comments and recommendations regarding future project actions requiring dredging have been noted. Your specific regulatory recommendations may prove useful during the process of revising Port Townsend's Municipal Code to implement the City's new Comprehensive Plan.
12. Your comments and recommendation regarding the control of stormwater quantity and quality have been noted. Specific goals and policies contained within the Draft Plan and DEIS suggest that all future development applications be reviewed to ensure conformance with the standards of the City's Stormwater Master Plan, Stormwater and Drainage Ordinance and Procedures Manual, and the

Department of Ecology's Stormwater Management Manual for Puget Sound (*e.g.*, policy 22.1 of the Capital Facilities & Utilities Element, page VIII-16).

13. Your comments regarding future project actions involving the construction of boat ramps have been noted. We believe the final paragraph on page 11 of your letter to be factually in error. It is the Port of Port Townsend (a separate and distinct municipal corporation), not the City of Port Townsend, that operates the Port Hadlock Boat Launch Facility.
14. Your comments and recommendations regarding future project actions involving the construction of marinas and moorage facilities have been noted. Your specific regulatory recommendation may be useful during the process of revising Port Townsend's Municipal Code to implement the City's new Comprehensive Plan.
15. Your comments and recommendations regarding utilities (including wastewater treatment outfalls and septic systems) have been noted. Policy 18.1 of the Capital Facilities & Utilities Element (*see* pages VIII -13 and VIII-14 of the Draft Plan & DEIS) requires almost all new development to connect to the City's wastewater collection and treatment system. The Draft Plan and DEIS acknowledges the fact that additional wastewater treatment plant capacity will be necessary to serve the City's anticipated population, before the end of the 20 year planning period. Thank you for your comments and recommendations regarding alternatives to, and the placement of, possible future wastewater treatment plant effluent outfalls.
16. Your comments regarding policy 14.7 of the Land Use Element (*see* page V-40 of the Draft Plan and DEIS) have been noted. The City of Port Townsend is committed to adopting and enforcing regulations in a manner respectful of the rights of individual landowners. As written, the policy merely reiterates what the City is required to do under locally adopted law (*i.e.*, the City's Environmentally Sensitive Areas Ordinance, Chapter 19.05 PTMC), the State Growth Management Act, and State and Federal decisional law.

Department of Community Trade & Economic Development (Office of Archaeology & Historic Preservation)



STATE OF WASHINGTON
DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION
111 21st Avenue S.W. • P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 753-4011

January 23 1996

Mr. David Robison, Director
City of Port Townsend
Building and Community Development Department
540 Water Street
Port Townsend, Washington 98368

Log: 011696-08-JE
Re: Comments on Draft Comprehensive Plan
and Draft EIS

Dear Mr. Robison:

Thank you for sending the Washington State Office of Archaeology and Historic Preservation (OAHP) a copy of the draft City of Port Townsend Comprehensive Plan (Plan) and draft Environmental Impact Statement (DEIS). On behalf of OAHP, I have reviewed the Plan and DEIS in regard to potential impacts upon cultural resources (including archaeological, historic, and traditional cultural properties) in the city. In response, I am submitting the following general comments followed by comments/recommendations on specific elements of the plan and DEIS.

#1

First, I want to extend appreciation to the City and Port Townsend citizens for including historic preservation goals and policies in the Plan, most prominently in the Community Direction Statement, Goal 15 in the Land Use Element, and in the Economic Development Element. Inclusion of these goal statements and policies demonstrate that Port Townsend citizens recognize that historic preservation is closely linked to sustaining the city's quality of life and protecting the existing character of the community.

#2 [Second, there is a recommendation that, at some point in the near future, the City develop and implement a separate historic preservation element as part of the Comprehensive Plan. The historic preservation element would likely expand upon existing goal and policy statements in addition to identification of specific long and short term strategies as to how the city plans to protect cultural resources in the city and its urban growth area. (See the enclosed historic preservation planning guide for ideas.)

#3 [A third recommendation is that historic preservation goals and policies be tied to other goal and policy statements in the Land Use Element and other elements of the Plan. It is important for the Plan to recognize that the presence of cultural resources affects, and is affected by, other planning elements such as land use, housing, capital facility planning, and transportation. The often subtle but important linkage of historic preservation with other planning issues holds true in all communities, but especially so in Port Townsend with its wealth of historic properties.

#4 [Finally, applicable zoning, development regulations, and regulatory reform procedures should also acknowledge the presence of cultural resources throughout the city and the work of the Historic Preservation Commission. As development regulations and streamlined permit application procedures are developed and revised by the city, it is important for these documents to include identification, evaluation, and protection of cultural resources.

In addition to the above general comments, I am also submitting the following specific comments and/or recommendations:

#5 [* In the Description of the Planning Area, it should be noted that both the Port Townsend and Fort Worden Historic Districts are not only listed in the National Register of Historic Places, but are also designated National Historic Landmarks. National Historic Landmarks are historic properties of national significance and is the highest level of designation of cultural resources in the nation. It may also be interesting to note that several properties in Port Townsend are listed in the Washington State Register of Historic Places.

#6 [* On page V-5 in the Land Use Element, it is recommended that the list of "major land use issues facing Port Townsend" include a statement regarding how land use regulations and development procedures can be shaped to incorporate and be more effective in protecting cultural resources throughout the city and its urban growth area.

- 7 [* On page V-18, OAHP notes and supports the C-III-Historic Commercial land use designation. It is also recommended that this land use designation be tied to design review by the Historic Preservation Commission as well as to special incentives such as application of the Historic Building Code and Special Valuation for Historic Properties program.

- 8 [* On page V-26, it is recommended that Policy 2.2 be changed to include archaeological properties. Suggested change may read something like the following:

Policy 2.2: Protect natural resources lands, archaeological properties and environmentally sensitive areas through public and private initiatives, such as:...

It is also recommended that a similar policy be included under Goal 15.

- 9 [* Also on page V-26, it is recommended that Goal 3 be changed to include cultural resources. Suggested change may read something like the following:

Goal 3: To develop a comprehensive...which protects the natural environment and significant cultural resources, provides passive recreation opportunities,...

- 0 [* On page V-27, it is recommended that Policy 3.5 be changed to include cultural resources. Suggested change may read something like the following:

Policy 3.5: Where possible, accommodate multiple functions with the open space and trails system, including, stormwater management; viewpoints; protection of cultural resources; wildlife habitat; and passive recreation.

A similar recommendation is made for Policy 3.9 on page V-28.

- 1 [* Also on page V-28, it is recommended that Policy 4.4 be changed to include significant cultural resources. Suggested changes may read something like the following:

Policy 4.4: Locate, design,...and shoreline resources) and cultural resources.

4.4.4. Incorporate significant cultural resources in the design and development of new park and recreation facilities and provide interpretation where appropriate.

Mr. David Robison
January 24, 1996
Page Four

- #12 [* On page V-29, the following change is recommended for Policy 4.5:
- Policy 4.5: Design and manage park and recreation facilities to maximize environmental protection and provide interpretive opportunities for ecological systems and features, and cultural resources.
- #13 [* On page V-31, OAHP notes and supports Policy 7.3.
- #14 [* OAHP notes and supports Goal 15 on page V-41.
- #15 [* On page VII-41, OAHP notes and supports Policy 7.3.
- #16 [* On pages IX-2 and IX-3 in regard to the list of "Major economic development issues facing Port Townsend," it is suggested that an additional issue be included such as: What role does the city's historic resources play in economic development and how can these resources be managed in a manner that protects the resource and remain an important element of the city's quality of life and economic development potential?
- #17 [* OAHP notes and supports the goal, policies, and strategies which relate to historic preservation in the Economic Development Element.

Thank you for the opportunity to review and comment on the Port Townsend Draft Comprehensive Plan. On behalf of OAHP staff, we look forward to working with the City and Port Townsend residents toward implementation of the Comprehensive Plan and protection of cultural resources. Should there be any questions, I may be reached at (360) 753-9116.

Sincerely,


Gregory Griffith
Comprehensive Planning Specialist

GAG:tjt
Enclosure

cc: Dr. Nikki Clark, Jefferson County Historical Society
Port Townsend Historic Preservation Commission
PORT TOWNSEND
COMPREHENSIVE PLAN

Response to Department of Community Trade & Economic Development Department (Office of Archaeology & Historic Preservation)

1. Thank you for your comment. The inclusion of goal and policy statements relating to cultural and historic preservation demonstrates the City's commitment to historic preservation as an essential element in maintaining community identity and quality of life.
2. Based upon this comment, the Planning Commission has recommended that a new policy 15.6 be included within the Land Use Element of the Comprehensive Plan which reads as follows:

 "Policy 15.6: Develop and implement an historic preservation element in a future amendment to this Comprehensive Plan."
3. Based upon this comment, the final Comprehensive Plan may include parenthetical cross-references to other goal and policy statements which are directly relevant to cultural and historic preservation.
4. Thank you for your comments and recommendations regarding the relationship between implementing regulations and historic and cultural preservation. These comments will be helpful as the City reviews and updates its Municipal Code.
5. The "errata" section of this FEIS indicates that the text of the DEIS overlooked the fact that both the Port Townsend and Fort Worden are on both the National Register of Historic Places, and are designated as National Historic Landmarks.
6. The text of the Land Use Element has been revised to include a new issue under the heading "Major Land Use Issues Facing Port Townsend," which reads as follows:

 "13. How can the City's land use regulations and development procedures be reviewed to be more effective in protecting the City's historic and cultural resources?"
7. Thank you for your comment and recommendation.
8. Based upon this recommendation, policy 2.2 has been modified, and now reads as follows:

 "Policy 2.2: Protect natural resource lands, archaeological properties, and environmentally sensitive areas through public and private initiatives, such as: open space tax incentives; cluster development; PUDs; transfer or purchase of development rights; public land acquisition; dedication of City owned tracts and street rights of way; conservation easements; landowner compacts; soliciting donations of land; downzoning; limiting the amount of lot coverage; and best management practices in development."
9. Based upon this recommendation, goal 3 has been modified, and now reads as follows:

 "Goal 3: To develop a comprehensive open space and trails plan and implementation program which protects the natural environment and significant cultural resources, provides passive recreation opportunities, is integrated with the nonmotorized component of the Transportation Element, and is designed to link neighborhoods with parks, significant open spaces, schools, shoreline access areas, mixed use centers and employment centers."

10. Based upon this recommendation, policy 3.5 has been modified, and now reads as follows:

"Policy 3.5: Where possible, accommodate multiple functions within the open space and trails system, including: stormwater management; viewpoints; protection of cultural resources; wildlife habitat; and passive recreation."

11. Based upon this recommendation, policy 4.4 has been modified, and now reads as follows:

"Policy 4.4: Locate, design, construct and manage park and recreation facilities to be compatible with natural features (*e.g.*, soils, geology, topography, and shoreline resources) and cultural resources. . .

4.4.4 Incorporate significant cultural resources in the design and development of new park and recreation facilities, and provide interpretive opportunities where appropriate."

12. Based upon this recommendation, policy 4.5 has been modified, and now reads as follows:

"Policy 4.5: Design and manage park and recreation facilities to maximize environmental protection and provide interpretive opportunities for ecological systems and features, and cultural resources."

13. Your comment has been noted.

14. Your comment has been noted.

15. Your comment has been noted.

16. The text of the Economic Development Element has been revised to include a new issue under the heading "Major Economic Development Issues Facing Port Townsend," which reads as follows:

"18. What role do the City's historic resources play in economic development and how can these resources be managed in a manner that protects the resource, while maintaining Port Townsend's quality of life and economic development potential?"

17. Your comment has been noted.

VIII. ERRATA TO THE DEIS

This section indicates minor corrections or additions made to sections of the DEIS for clarity or in response to comments. Strikeouts indicate text deletion, and double-underlining indicates text addition.

Description of the Planning Area - Chapter IV of the DEIS:

Page IV-38: A new paragraph should be added immediately preceding the heading "Total Archaeological & Historical Resources" which reads as follows:

"Both the Port Townsend National Register Historic District and Fort Worden State Park are not only listed in the National Register of Historic Places, but are also designated National Historic Landmarks. National Historic Landmarks are historic properties of national significance. These landmarks represent the highest level of designation of cultural resources in the nation."

APPENDIX "A" - DISTRIBUTION LIST

(Note: The following agencies, entities and individuals have either recieved copies of the FEIS or a notice that the FEIS is available. Those receiving copies of the FEIS pursuant to WAC 197-1-460 are noted with an asterisk; all other agencies and entities have received notice that the FEIS is available).

Local Agencies & Entities

Municipal Research & Service Center
10517 N.E. 38th Place
Kirkland, WA 98033

Growth Management Clearing House,
Urban Planning & Design Department,
University of Washington
410 Gould Hall, J0-40
Seattle, WA 98195

*Scott Kilmer
Jefferson County Public Works Department
P.O. Box 1220
Port Townsend, WA 98368

*Al Scalf, Director
Jefferson County Planning Department
P.O. Box 1220
Port Townsend, WA 98368

Jefferson Transit
Jeff Hamm, Manager
1615 Sims Way
Port Townsend, WA 98368

Olympic Air Pollution Control Authority
James Wilson
909 Slater-Kinney Rd SE, Suite 1
Lacey, WA 98503

Jefferson County Economic Development Council
Eric Anderson, Director
P.O. Box 877
Port Townsend, WA 98368

Port of Port Townsend
Port Commissioners
P.O. Box 1180
Port Townsend, WA 98368

Jefferson County Museum
210 Madison Street
Port Townsend, WA 98368

Port Townsend Public Library Director
1220 Lawrence Street
Port Townsend, WA 98368

Gene Medina, Superintendent
Port Townsend School District #50
450 Fir Street
Port Townsend, WA 98368

Friends of Kah Tai
611 Scott Street
Port Townsend, WA 98368

Bob Wheeler, Director
Public Works Department
5210 Kuhn Street
Port Townsend, WA 98368

Howard Scott, Fire Chief
Port Townsend Fire Department
1310 Lawrence Street
Port Townsend, WA 98368

Point-No-Point Treaty Council
Environmental Review Coord.
7999 NE Salish Lane
Kingston, WA 98346

Don McDaniel
Puget Power & Light Company
P.O. Box 555
Port Townsend, WA 98368

US West Communications
Ed Gay
635 North Oakridge Drive
Port Angeles, WA 98362

Vic Dirksen, Administrator
Jefferson General Hospital
834 Sheridan
Port Townsend, WA 98368

Lee Daniher
Summit Cablevision
P.O. Box 1253
Port Hadlock, WA 98339

Port Townsend-Jefferson County Leader
226 Adams Street
Port Townsend, WA 98368

Main Street Project
211 Taylor Street, Suite #4
Port Townsend, WA 98368

PT Marine Science Center
Fort Worden State Park
200 Battery Way
Port Townsend, WA 98368

Jefferson County Home
Builder's Association
111 Oak Bay Road
Port Hadlock, WA 98339

State Agencies & Entities

Joyce Deshaye
Energy Office
P.O. Box 43165
Olympia, WA 98504-3165

Bernie Warner
Department of Corrections
P.O. Box 41101
Olympia, WA 98504-1101

Steve Keller
Department of Fish and Wildlife
P.O. Box 43155
Olympia, WA 98504-3155

Steve Penland
Department of Fish and Wildlife
P.O. Box 43155
Olympia, WA 98504-3155

Lorinda Anderson
Interagency Committee on Outdoor Recreation
P.O. Box 40917
Olympia, WA 98504-0917

Richard Sarver
Department of Health
P.O. Box 47822
Olympia, WA 98504-7822

Carter Bagg
Superintendent of Public Instruction
P.O. Box 47200
Olympia, WA 98504-7200

Jeffrey Showman
Utilities and Transportation Commission
P.O. Box 47250 Olympia, WA 98504-7250

Jerry Probst
Department of Natural Resources
P.O. Box 47014
Olympia, WA 98504-7014

WA State Department of Transportation
Marine Division, SEPA Review Section
Coleman Dock, Pier 52
Seattle, WA 98104

Judy McNickle
Parks and Recreation Commission
P.O. Box 42653
Olympia, WA 98504-2653

Steve Borchardt
Department of Social & Health Services
P.O. Box 45848
Olympia, WA 98504-5848

Charlie Howard
Department of Transportation
P.O. Box 47300
Olympia, WA 98504-7300

Regional Planner (5 copies)
Department of Community, Trade & Economic
Development
P.O. Box 48300
Olympia, WA 98504-8300

Bonnie Sims
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Steve Tilley
Puget Sound Water Quality Authority
P.O. Box 40900
Olympia, WA 98504-0900

U.S. Fish and Wildlife Service
Lynn Childers
3704 Griffin Lane S.E., Suite 1012
Olympia, WA 98501-2192

*WA State Department of Ecology (2 copies)
Environmental Review Section
P.O. Box 47703
Olympia, WA 98504-7703

*WA State Department of Fish & Wildlife
SEPA Environmental Review
600 Capital Way, N.
Olympia, WA 98501-1091

WA State Department of Natural Resources
David Dietzman, SEPA Center
P.O. Box 47015
Olympia, WA 98504-7015

WA State Department of Transportation
District 3, SEPA Review
5720 Capitol Blvd, KT-11
Olympia, WA 98504-7440

WA State Parks & Recreation Commission
SEPA Information Center
7150 Clearwater Ln, KY-11
Olympia, WA 98504-5711

*State Office of Archaeology & Historic
Preservation
Dr. Robert G. Whitlam
P.O. Box 48343
Olympia, WA 98504-5411

Individuals

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1891 S. Jacob Miller Road
Port Townsend, WA 98368

Erik Fredrickson
240 Sand Road
Port Townsend, WA 98368

Roger Evans
4545 Sand Point Way, NE, Suite 706
Seattle, WA 98105

**APPENDIX "B" - MINUTES FROM THE JANUARY 30, 1996
DEIS PUBLIC HEARING**

BUILDING & COMMUNITY DIRECTOR'S HEARING ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

January 30, 1996

At 7:00 p.m. on January 30, 1996, in the Council Chambers at City Hall, the Building & Community Development Director held a special public hearing to accept public testimony on the Draft Environmental Impact Statement (DEIS) for Port Townsend's Comprehensive Plan, BCD Director Dave Robison presiding, with Staff Planner Eric Toews also in attendance.

Mr. Robison noted that since there was such a small audience they would go through the material quickly and move to the questions and answers. He explained the purpose of the meeting is to focus on the overview of the State Environmental Policy Act (SEPA) Growth Management Act (GMA) process. He pointed out the Draft Comprehensive Plan combines two different documents, the Growth Management Comprehensive Plan, which essentially gives the goals and policies and the Vision Statement (these are really the heart of the Plan) and all of the supporting analysis and environmental review (all the maps, and existing conditions information). He said it is an integrated Comprehensive Plan and Environmental Impact Statement in one document.

Mr. Robison stated that the focus of the hearing is the Draft Environmental Impact Statement and not on the Comprehensive Plan. He said with the release of the Comprehensive Plan you also have to have an Environmental Impact Statement (EIS), and under the State Environmental Policy Act you have to hold a hearing on the EIS. He stated the intent of the meeting is to obtain comments on the Draft Environmental Impact Statement rather than comments on the goals and policies of the Comprehensive Plan itself. He then outlined the agenda.

Overview of the SEPA/GMA/Comprehensive Plan process.

What is an Environmental Impact Statement (EIS)? In 1971 the State passed the State Environmental Policy Act and required Environmental Impact Statements for big projects that could have probable adverse environmental impact, or those types of actions that cities and counties take on planning documents (i.e., comprehensive plans). What we have before us tonight is an EIS that is a non-project proposal, the Comprehensive Plan, that may have a significant adverse environmental effect. He pointed out additions to the draft Land Use Map -- new commercial zones, new roads proposed, and said all those types of new proposals could have some fairly significant adverse environmental impacts. He said the role of the SEPA is to evaluate the significant environmental impacts and establish a record, so that, prior to a decision by the City Council, they have all the information and can make a decision as to potential impacts of the Comprehensive Plan on the environment.

Mr. Robison said one of the things done under State law before beginning the process of putting together a plan is to hold a scoping meeting. The purpose of a scoping meeting is to try to obtain community input on what the likely environmental impacts are that could be associated with some of the goals and policies. He said in October of 1994 the City had a scoping meeting on the Plan

Alternatives to the Proposed Action.

Mr. Toews said the alternatives considered in Chapters X and XI of the Draft Comprehensive Plan and EIS all had their foundation in the Community Direction Statement which is Chapter III of the Draft Plan. He said the Community Direction Statement is really the Vision Statement -- a statement of what Port Townsend residents would like the community to look like in 20 years. The Direction Statement was a product of countless hours of citizen involvement in the coffee hour process back in the spring of 1993, and also a number of community workshop meetings in 1994. He pointed out the Direction Statement draws heavily upon the results of the coffee hours and tries to distill the most important elements or themes that were represented in those community coffee hour meetings and put that into a coherent statement of what most people in Port Townsend would like the community to look like at the end of the planning period. All of the alternatives that were evaluated in the EIS are founded on that statement, but all of them placed distinctly different emphases on some of the themes that were represented in those coffee hours.

He said that before they begin the discussion of the alternatives, they need to look in a conceptual way at what the existing development patterns in Port Townsend are like. He pointed out areas on the map and said that what they find is that the eastern and southern portions of the City are most intensely developed. When you look outside the City's corporate limits to the area known as Glen Cove, which may have the potential to be included in the future in the City's final Urban Growth Area, you see isolated pockets of mainly commercial and some light manufacturing development, but very little population density in that area, and on the whole not a tremendous amount of development.

Alternatives evaluated in the EIS:

NO-ACTION ALTERNATIVE -- Existing Plans and Regulations

ACTION ALTERNATIVES:

- ▶ **Alternative No. 1** Residential Community Alternative. (*Dispersed Growth*)
- ▶ **Alternative No. 2** Community Neighborhood Alternative. (*Focused Growth*)
- ▶ **Alternative No. 3** Urban Community Alternative. (*Concentrated Economic Growth*)

Alternatives evaluated in the EIS range from the No-Action Alternative to a Residential Community Alternative. It goes from the low end of the spectrum in terms of development over the 20-year planning period to what is known as community neighborhoods or focused growth alternatives which anticipate more growth than the Residential Community Alternative, but somewhat more concentrated. Finally, there is an Urban Community Alternative that anticipates much more substantial growth, in particular economic and population growth, over the planning period. He showed a map portraying the planning area, Port Townsend, and areas to the south in the Glen Cove area at the end of the 20-year planning period, if they were just to continue to implement the Comprehensive Plan and the zoning ordinance that is in effect today. He noted that alternative was not tied to any particular population at the end of the 20-year period and does very little to reduce

suburban sprawl both within the City in terms of trying to concentrate development in already developed areas, but also out in the Glen Cove area, and proposes no expansion of the City's UGA and no additional policies or regulations to guide growth and development. The main problem with that alternative is that it doesn't comply with the State Growth Management Act.

Q. Audience: Is that pretty much driven by local zoning ordinances? Is that how it's written?

A. Toews: The No-Action Alternative represents what would happen if the City were to continue to develop under the existing planned zoning ordinance. It really reflects the development densities that are anticipated under the City's current zoning.

Robison: It's really conceptual. The maps are on the Geographical Information System (GIS) -- We took these things off the GIS which show the actual footprints, kept them fairly broad and conceptual at the alternative stage and will focus in on the details as we move through the environmental review.

Mr. Toews said this alternative is the first of the three alternatives that are evaluated in the EIS. He showed the Residential Community Alternative and said it looks remarkably similar to the previous conceptual map. It anticipates few changes to the City's current zoning; what is contemplated is a number of multi-family upzones so that the City could provide more affordable housing opportunities over the 20-year period. No commercial or manufacturing upzones are contemplated. The changes that would occur under this alternative relate mainly to implementing the Growth Management Act requirements with respect to affordable housing, concurrency (the concept of having capital facilities and services available to serve new development at, or within a defined period of time after the development is approved), and some measures to identify and protect open spaces, although that would not be done systematically under this alternative. This residential alternative is linked to a population of just under 12,000 people by the end of the 20-year planning period. He showed that Alternative No. 2, community neighborhoods and focused growth, seeks in many ways to depart substantially from the City's past pattern of growth and development. Alternative No. 2 seeks to concentrate new residential and also some commercial development near major intersections (i.e., intersections of arterials, or an arterial and collector) that would serve as mixed-use centers with ground floor commercial development and upper floor residential. Development around those nodes would include higher density residential growth, as well. So the idea is to try to encourage growth and development in areas that are already served with infrastructure, and help preserve the City's special character by identifying and preserving some of the City's open spaces and habitat areas; this alternative anticipates a systematic effort to accomplish that. This alternative is linked to a population projection of just over 13,000 people by the end of 20-year planning period.

Mr. Toews said Alternative No. 3, evaluated in the EIS, is the Urban Community or concentrated economic growth option. The objective of this option is to achieve a job/housing balance in our community. He said one of the things that has been a recurring theme throughout the planning process so far is that many people identified the need for more employment opportunities in our community. There are far more people living in the community than there are good jobs. This alternative seeks to redress that imbalance, actively promoting economic development and

identifying significant areas for commercial and manufacturing upzones both within the City Limits (mainly in the southwestern corner of the City, as well as some areas along the Gateway corridor) and in an expanded urban growth area (UGA) that included all of the County's highway Commercial Zone south of the City, as well as areas that are currently outside of commercial areas to the east, up to Port Townsend Bay. This alternative is linked to the highest population projection, a projection of just under 18,000 people by the end of the planning period. Of all of the action alternatives, this one probably poses the most significant potential for environmental impacts, mainly because of the increased impervious surfaces that would be associated with population growth and development -- all of the roadways, and construction activity.

Mr. Toews said the No-Action Alternative he discussed at the outset, is probably associated with the second greatest environmental impact overall, because it takes no pro-active steps to attempt to guide growth and development other than implementing the existing plan and regulations. Alternative No. 1, Residential Community, is linked to the third greatest impact overall, and finally Alternative No. 2, is characterized in the Environmental Impact Statement as having the least overall impact.

Q. Audience: Is there a simple explanation as to how the population projections relate to your alternative? How do you get 18,000? Which came first the alternative or the projection?

A. Toews: That is a really good question. In the Fall of 1994, the City and the County jointly commissioned a population forecast from the Waterson West Group, to prepare a range of population projections for both the City and County to use for growth management planning purposes. One projection was based on the State approach to population forecasting and several other population forecasts that used slightly different methodologies. What we came up with at the end of that report was a fairly wide range of possible population scenarios for the City of Port Townsend. When we began to develop the alternatives for reviewing the Environmental Impact Statement, it seemed reasonable to link each one of those options to a different growth scenario based on the character of the alternatives. More urban community, more commercial and manufacturing development, would be more likely to be associated with a higher population projection.

Robison: We received three different population forecasts: low, moderate, and high. The moderate was 13,000, and one of the goals was to try to tie each of the alternatives to one of the population forecasts. Port Townsend has a tremendous capacity for growth; if you want to build it out at a very high density to accommodate that buildup much further than the 20-year planning that we intended, total population could range anywhere from 25,000 to 32,000 people (conservative estimates). What was the most likely scenario? Based on historic trends, on changing national and international economy, and Port Townsend's location in Washington State, the moderate forecast projects a 20-year total of about 13,000 people. That is a little higher rate than we have been growing over the past 5 years, about 2-1/2 to 3 percent annual growth or about 200 to 250 people a year. If we were to try to put together an alternative that looked at that, trying to focus based on the Vision Statement, the Community Direction Statement, how might that best fit under an alternative? Based on the work of the Land Use Workgroup and people that came to other meetings, it seemed like everybody wanted to create compact neighborhoods, like the uptown in various

locations, try to consolidate some of the growth in and those areas, not try to serve the whole City with infrastructure everywhere to promote sprawl, and try to save some taxpayer dollars in targeting growth in some areas with some limited opportunities for more commercial growth. That differs from the third alternative which is more rapid growth, a little over 4 percent a year, that really looked at trying to stimulate a lot of job development, putting in some economic development, and bring the jobs in to sustain the population growth. That was one of the other things in the Community Direction Statement, Port Townsend didn't just want to be a retirement community and tried to reverse that trend. These alternatives are really derived from two things: what does the Community Direction Statement say -- the vision?; and then the population forecast of three likely scenarios. Based on that vision and three different population forecasts, what was the best way to try to put that together and look at those alternatives when we go through developing the goals and policies. That was the approach taken.

Potential Environmental Impacts.

Mr. Robison said with those alternatives, they began to evaluate the environmental impacts associated with each alternative as well as the costs to provide the services to facilitate growth at that level. That is what the Environmental Impact Statement really does; what is the cost associated with growing at Alternative No. 3 within the 20-year planning framework as opposed to Alternative No. 2 or No. 1? We found if we were to try to increase the population forecast for No. 3, we were going to have a tremendous increase in improvements to infrastructure, wastewater treatment plant, water supply and there are probably more environmental impacts as opposed to No. 2 which may not have as many impacts. In Table 10 there is a summary of the major issues of the alternatives; the population forecast is one of the keys. In Chapter X of the Draft Comprehensive Plan, if we don't do anything, based on the three forecasts Mr. Toews discussed, it could range anywhere from 11,000 to nearly 18,000 over the 20-year planning period, a range of a little less than 2 percent to over 4 percent annual growth: Alternative No. 1 -- 11,800; Alternative No. 2 -- a little over 13,000; Alternative No. 3 almost 18,000. Mr. Robison said that associated with each of those alternatives is a summary of the impacts and pointed out differences between alternatives in a broad range of magnitude of the impacts. He said in addition to that type of analysis they then tried to rank the environmental impacts of the alternatives, also in Chapter X.

Mr. Toews discussed the issue of unavoidable adverse impacts also listed in Chapter X. He noted it is important to realize that growth and development in the City of Port Townsend under any of the alternatives is going to be associated with impacts to the environment that are unavoidable. They are a natural consequence of continuing growth and development. He said some of the alternatives have fewer impacts than others; adoption of any of the planned alternatives is going to result in some probable significant adverse impacts that cannot be mitigated. The list summarized what to expect in that regard. He took examples from the list starting with increased use of land for urban development -- the natural consequence of growth and development regardless of whether we choose to continue under the No-Action Alternative or adopt Alternative No. 3 and pursue a far more urban future for our community. Growth and development is going to result in demand for

public services. Increased emissions to air is another good example, more people, more people using wood stoves, more people driving automobiles, likely more people working in light industry in the area. He said this focuses in on some of the most central unavoidable adverse impacts that clearly are associated with growth and development, not necessarily associated with adoption of the Plan. The Plan in and of itself will not do that. It is just growth and development under any plan alternative. Mr. Toews stated they would answer any questions and address any concerns and let the audience provide any comments and suggested changes or modifications to the Environmental Impact Statement.

Future Meetings on the Goals and Policies of the Comprehensive Plan.

Mr. Robison reviewed the process in going into the hearings.

Presently --

- Draft Comp Plan and Draft EIS are out.
- Notice issued that the Comp Plan and EIS are available.
- Public Hearing on the EIS in progress at this time.

In the Future --

- Conducting a lot of meetings over the next couple of months. (Schedule handed out.)
- A Public participation program with City Council. (Additional input in paper, Video, Public TV)
- Conducting several Planning Commission Public Hearings and Workshops.
- Compiling and responding to all the comments on the Plan and the EIS.
- Issue FEIS (Final EIS) Notice and Notice for Review. Add all that into a final Environmental Impact Statement.

Q. Audience. Would you go over the schedule for Public participation a little?

A. Toews: He discussed the Timeline from now until final adoption of the Plan and listed the three steps in the public involvement process:

- I. A series of four public workshops involving the Planning Commission, City Council with the Public invited to go over the draft Comprehensive Plan. The workshops will begin one week from tomorrow in the Pope Marine Building.
 1. Wednesday, February 7 -- Land Use Element and Land Use Map
 2. Wednesday, February 14 -- Housing and Economic Development Elements
 3. Wednesday, February 21 -- Capital Facilities and Utilities Element
 4. Wednesday, February 28 -- Transportation Element
- II. Following the workshops the Planning Commission will begin a series of its own more formal public hearings to receive public testimony. Several dates are identified for possible uses as hearing dates. These dates may change a little bit, so I would encourage you to follow the paper. We have four hearings that are identified beginning on March 7th and running through April 18th. There are also a number of dates that are identified where the Planning Commission can continue the hearing to another date. All told, the Planning Commission is likely to be holding hearings from the first week of March all the way to the end of April. Following that, the

Planning Commission will have an opportunity to deliberate and consider the public testimony that has been submitted and prepare a report and recommendations for the advice of the City Council.

- III. The Council will then have an opportunity to hold its own public hearings and receive additional testimony. Those will begin in May, around May 21st until the end of May, May 29th. Council is anticipating at this time adoption of the Plan, probably late May or early June.

Q. Audience: Asked about congruity between the Planning Commission hearings and the City Council hearings.

A. Toews: First of all, the hearings are obviously open and Councilmembers are free to attend. Generally the Planning Commission will then deliberate and prepare a formal written recommendation that will include lines-in and lines-out, strike outs through certain policy language and new language indicated by double underline, probably along with a written report that describes the reasons supporting the changes they have made. This report will be forwarded to the City Council for their review and consideration before opening up the process for public testimony.

Questions and Answers on comments.

Q. Audience: Are you folks from the Planning Department?

A. Robison: Apologized and said he guessed they hadn't introduced themselves: Dave Robison, Director of Building and Community Development; and Eric Toews, Lead Planner on the Comprehensive Plan.

Q. Audience: Asked about the Plan.

A. Robison: He explained the way the process worked. Two years ago, they started working on the Plan with a citizen group of about 40 people. The first few months was just coming to gain a better understanding of the Growth Management Act and things of that nature. The citizen participation process was structured with six citizen workgroup committees composed of 10 people including a chairperson and a staff member. Each committee was chaired by a City Councilmember and Planning Commission member and staffed by Mr. Toews, the Public Works Director, or himself who worked with the workgroup members. Each element, whether it was land use, housing, or transportation had eight different citizens and was chaired by a different City Council person. He said Mr. Toews served as liaison between the groups. It took about a year to develop the goals and policies with the workgroups and then to do the subsequent environmental review and analysis of that. He noted the Plan was over a year in the making. Last September, after the preparation of the Draft Plan was pretty much complete, they were in negotiations with the County over population projections in the Glen Cove area to the south. The County had some setbacks in their Comprehensive Plan process, and the City put their Plan on hold for the rest of the year awaiting the County to catch up so the City could release theirs at the same time. He said unfortunately the County's process is still a little further behind the City's, but they felt they needed to move forward

with the City's process. Ideally, they would be releasing their Comprehensive Plans at the same time, because the City's Comprehensive Plan needs to dovetail and be closely tied to the County's Plan. He said the City may have to revise it or amend it as they go through the process.

Toews: He said they had technical help on the Transportation Element and also on the Capital Facilities and Utilities Element, but most of the grunt work was done inhouse.

Robison: He said with some of the infrastructure work they had engineering help from CH2, so there was some technical assistance. Most of the goals and policies were drafted by Staff, but heavily revised and edited by each of the workgroups and reformatted to get the policy direction in each of those workgroups. The workgroups were made of a fairly diverse and representative group of individuals for each of those elements.

Q. Audience: There are some objective criteria which factor in: SEPA, Growth Management Act. Who is going to do that, and how is that done? You go to State agencies, they review it and give you back comments. Is that the only thing that happens?

A. Robison: As we went through the planning process, at the Staff level:

- **GMA.** There is the Growth Management Act. It sets the policy, framework, and the law.
- **Procedural Criteria.** There is the Procedural Criteria that was set up by the State. In each chapter -- Land Use Element, Housing Element, or Transportation Element, etc., we discuss right up front in the first couple of pages what the law says about each of those elements. Then it has procedural criteria -- State recommendations on how you go through the analysis to put together that element, the factors that should be looked at. We tried to make sure the workgroups understood what the procedural criteria were, so that as we were developing the element we were in compliance with the State Growth Management Act (GMA) and the Procedural Criteria. We feel fairly confident from our review of each of the elements, and our City Attorney's review of the elements, that it's consistent with State law.
- **DCTED.** Department of Community Trade and Economic Development, which is the Growth Management Division at the State level, reviews our Plan to make sure that from their understanding of the Growth Management Act is consistent with the (GMA).
- **Other Agencies.** Other agencies look at it for their particular aspect, whether it's Fisheries, or Department of Transportation, and send out comment letters as well. If you look in the EIS at the end of Chapter X, there is a list of the State agencies we have to send the Plan to for their review. They will be issuing letters, and we should be taking their comments very seriously and making revisions based on their comments. The letter we got from the Office of Archeology and Historic Preservation earlier this week had really good comments, and we will probably amend the Plan as we go through the Planning Commission to address all their comments.
- **Citizens, County, other Jurisdictions.** The other aspect is citizen comments. Citizens, the County, or other affected jurisdictions may decide that one aspect of our Plan is inconsistent with the Growth Management Act or the Procedural Criteria. They can always appeal that section to the independent board appointed by the Governor called the Growth Hearings Board which would sit as judge as to whether or not the Plan is consistent with the Growth Management Act. These are the objective criteria under the State law. Really, it's the community, hopefully, providing input to the Planning Commission and the City Council on revising the Plan, and Staff will be saying, "That

may not be consistent with the Growth Management Act.” Ultimately, there is a lot of flexibility under the GMA for the Community to make some decisions, but if it’s appealed, the Growth Hearings Board has criteria, and they are objective, on how to make a decision and whether or not it is consistent with the law.

Q. Audience: If this were a private project, that project would put forward an environmental impact statement, go before a hearing examiner for a hearing, and issue a certificate of MDNS, so mitigations could be done, in something like wetlands. If you disturb a wetland, you are supposed to replace it. What happens here? What happens with a Public Agency? Is there a hearing; is there a hearing examiner? How does that process work?

A. Robison: Port Townsend doesn’t have a hearings examiner like a lot of other jurisdictions. We use the Planning Commission, and so our adoption process doesn’t use somebody like the hearing examiner for the Comprehensive Plan or even projects. Let’s say you have a project. The proposal would be looked at under SEPA, as you just mentioned. The responsible official is the person that each City or lead agency has to make the evaluation, whether or not the project requires an EIS, and whether mitigation measures are required. So ultimately a DNS, a list of conditions, or an MDNS would be issued to try to mitigate those impacts. Under a proposal or a Plan, it’s a little different, because it’s a programmatic action; you’re looking at order of magnitude of changes. What the Growth Management Act recognizes is that at the Plan level we should be doing the EIS to evaluate those broad environmental impacts and then, when we do the development regulations to implement the Plan, we have to revise our zoning code and all the development regulations, at the same time we might do a supplemental EIS which builds on that evaluation. When you move from the broader range to the more specific, you more specifically identify impacts; so, we might have to do a supplemental EIS or least a DNS or MDNS. As we move from the broader to narrow, we will ultimately have projects. Projects will come in at some time down the line, and they will say, “We’re consistent with this and this,” and it will be the role of Staff to determine how consistent it is. If it’s not consistent, more SEPA review will be conducted and an EIS or MDNS would be issued on the project -- at a project level. At the plan level you are really at the broad level; and at the next stage, the development regs, you are moving into a finer review; and at the project level you are at a much more detailed range of analysis. Another way to look at this is, under Regulatory Reform, one of the things the City is doing now is that if a permit comes in, under the Growth Management Act and Regulatory Reform, because this really changes the way government does business, there are two things: with the project, you want to make sure it is consistent with the plan, the vision, the environmental impacts, and development regs. So what you are doing is looking at consistency with the plan at the project level. You look at the density, the type of land use, whether or not you have appropriate public facilities; it’s a staged process. You look at the consistency of the project with the Comp Plan, the development regs, the engineering standards, as well as what is called the level of service standards for public facilities. Meanwhile, you also look at the project under SEPA, and if you do a good job on the Comprehensive Plan, in the development regs and design standards, you should be evaluating all the environmental impacts. SEPA becomes a kind of second tier to the Comp Plan and the development regs, usually only used as a catch-all to address those impacts that weren’t evaluated in the Comp Plan and the development regs and the design standards. What you do then at the SEPA level under the new framework of the

Growth Management Act and Regulatory Reform is evaluate the extent to which the project has already been evaluated for its environmental impacts, whether or not we have missed anything, or whether there is the need to do another MDNS to mitigate those impacts. That is a long answer to your question, but the Growth Management Act really does encourage jurisdictions to move away from using SEPA as the main tool to create mitigation when you should be doing it at the Comp Plan, the development regs, and engineering standards.

Toews: To be absolutely clear, and maybe to recap; what really guides the development of an environmental review document for private projects as well as programmatic government proposals, is the State Environment Policy Act (SEPA), and the SEPA rules which are administrative code rules. The administrative code sets out requirements that are a little bit different for project proposals than plans or programmatic or, in what is referred to in the Green Book, as “non-project proposals.” They are really plans or programmatic actions that should be analyzed at a level of detail sufficient to evaluate the qualitative differences between the alternatives. What you tend to see in Plan Environmental Impact Statements versus Project Environmental Impact Statements is a review that is far more qualitative and conceptual in nature than would be the case with a Project level review which, oftentimes, can be quantitative.

Robison: You are still going to have environmental review, but you are hoping that your plan is going to be helped by addressing those broad impacts, and then those finer impacts, and have mitigation measures under each of those. The level of review doesn’t have to be as great because you anticipated those impacts up front.

Q. Audience: In other words, you have three alternatives, or four alternatives, right now on the books. The environmental impact of those alternatives is not evaluated against the objective standards. What happens is, the community as a whole decides that they like Alternative No. 2, and associated with that is a certain amount of environmental impact. It just is; it’s going to be what it’s going to be. So there is no objective criteria that says, “No you can’t have Alternative No.2, because you’re violating some objective standard.”

A. Councilmember Jenks: There are some objective standards, because there are ordinances on the books for the municipality of Port Townsend that provided objective standards, for instance how close to a wetland you can build your house. The objective standards are the municipal code, and none of the alternatives can violate those objective standards.

Robison: You could change all those standards if you wanted to.

Audience: That is a problem.

Jenks: You could, but you would have to change them to other objective standards. You can’t change them to subjective standards.

Audience: I used to be in this business. My recollection is that the prime driver is the Comprehensive Plan. All the ordinances and everything else that comes thereafter, derives from the Comprehensive Plan. In other words, if you have a set of standards on the books right now, and it turns out that the consequences of your Comprehensive Plan are inconsistent, the Comprehensive Plan takes precedence. All your ordinances, all your standards, all your zoning codes are derived from the Comprehensive Plan, not the other way around.

Jenks: One of the first things that we did under Growth Management, for instance, was develop the critical areas ordinance, which dealt with such things as seismic areas, wetlands, steep

slopes, drainage corridors, and wildlife conservation areas. So that ordinance is on the books, and it was the initial part of Growth Management of which the Comprehensive Plan is also a part. Those things have to work together. The Comprehensive Plan has to work with the ordinances that have been developed under Growth Management that are on the books. If it doesn't, it is in question and needs to be looked at against the criteria of local GMA regulations that have already been developed. It seems like that is one of the ways in which you actually could comment in a real way on the EIS, comment on it as each of the alternatives affects the ordinances which are already on the books, which have to do with what affects the environment by various alternatives.

Toews: The way you described it, the Comprehensive Plan really setting the foundation, is absolutely correct. What is required, however, under the Growth Management Act is something different than what was commonly the practice in the past. Under Growth Management, your implementing regulations must be consistent with and implement the Plan. Your Plan can no longer be a dream document; it must actually be implemented under Growth Management. The hierarchy is this: the State legislature has passed the Growth Management Act that sets the framework and establishes the requirements for local jurisdictions to follow in developing Comprehensive Plans. All of the alternatives, with the possible exception of the No-Action Alternative, evaluated in the Environmental Impact Statement, would comply with the Growth Management Act, but would place different emphases on certain of the goals that are set forth in the Growth Management Act. But the Act sets the framework for the Plan and the Alternatives, and then in terms of guidance in preparing the Environmental Impact Statement, the State Environmental Policy Act and the Administrative Code Rules set the framework for how the City goes about evaluating the alternatives in the Draft EIS.

Robison: It's really a community's decision whether to have higher density urban scale development, or more like Alternative No. 2. What you see with the draft Land Use Map is a combination between 2 and 3 at this particular time. While it's not deemed the preferred alternative in our EIS, the Land Use Map in the back of the Plan really takes concepts from 2 and from 3, but embraces the moderate Waterson forecast of 13,000 over the next 20 years as the preferred option. It is a little more environmentally friendly than this option. Whether or not the community decides that they want to be more environmentally friendly or focus more on promoting urban scale development, and commercial and manufacturing use – that is what we are going to find out as we go through this public process.

Jenks: Are you implying that the Comprehensive Plan can actually change the laws based on scientific data? Are you implying that the Comp Plan can basically take precedence over existing environmental statutes?

Robison: I am saying that if the community decides that they want to reduce their wetland buffers to 25 feet, that's a community decision.

Jenks: Even though the State criteria for wetland buffers in a certain type of classification are different?

Robison: Sure, since we are an Urban Growth Area and we're not a county. There's a wide variety of wetland buffers in cities.

Jenks: Well, then let's use something else that's a little bit less fuzzy. Maybe we should use frequently flooded areas, for instance.

Robison: There are two types: frequently flooded areas, and there are wetland areas and

drainage corridors. Since 1990, the City has taken an approach to use natural systems. I think that is a more environmentally friendly approach, because it uses land to treat drainage and it creates wider buffers and it promotes more open space. If the City were to go to an even more concentrated growth scenario, we would probably be forced to go to curb and gutter, and so we wouldn't be using drainage corridors. We would be using curbs and gutters and expanding our wastewater treatment plant to provide the water treatment facilities in that kind of scenario. It would become much more like the urban area you find over on the other side of Puget Sound. There are costs associated with that, there's the loss of character and the small town community atmosphere. What we have heard from the community that has participated in the process so far is to retain the small town atmosphere, etc. That would be going back and doing some major revisions to the entire Plan if it were to be going in that direction. That is not what our alternatives are really looking at, at this point, but that is certainly an option that the community can decide on.

Audience: That's the key -- the key is if the City of Port Townsend, whatever that is, decides that they want to do "X," they are going to do "X."

Jenks: Do "X" and pay for it.

Audience: That's right. You cannot have a Comprehensive Plan that says you want to have industry, want to have Parks, and want to have waterfronts, etc. and then create a zoning plan which violates it. You can't do that. That's strictly against the law.

Robison: Right, Under the Growth Management Act.

Audience: Everything has to follow. The Plan is the governing document; everything falls on that.

Jenks: What about limited resources?

Audience: It doesn't matter. If you adopt a Plan, everything you do thereafter has to be consistent with that Plan. It's very, very important that they lay down that Plan and that you understand what the consequences are of what you are doing. The spot zoning is out, putting service stations in the middle of a residential neighborhood is out; you can't put the big hotel on the waterfront that violates something in the Comprehensive Plan.

Jenks: I think that is a very good point.

Robison: So what the Environmental Impact Statement does is help the decision makers and the Public evaluate the trade-offs. You arrange the trade-offs associated with each of those alternatives so we can decide whether or not we want to be more like a residential community, more a retirement community or we want to move more into Alternative No. 3, more like an urban community elsewhere in the State of Washington. That is the range of choices we have. The Environmental Impact Statement is intended to help get us thinking about those choices and the environmental impacts associated with them, as well as the costs of development. If you have any specific comments on the EIS, we would love to hear them so we could write those comments down and put them in the FEIS (the final). Or you can write those comments down after you've had more time to sit down and review Chapters X and XI as well as Chapter IV.

Jenks: It is my understanding with the EIS process, whether it is programmatic or project, that comments on the EIS have to be responded to in reference to the appropriate parts of the project or program.

Robison: It has to be inserted in the final EIS. So, every written comment would have a

response back, whether it's, "No response needed," or, "See response . . . on previous page." Every written response we receive will have a response comment back to it, in the Final EIS. What you find is that most people don't want to talk about the EIS, they want to talk about the Comprehensive Plan, and the goals and policies. What I have found in the past, if you have a project everybody wants to talk about the environmental impacts of a project, but when you are talking about developing the Comprehensive Plan, everybody wants to talk about the goals and policies and the map of the Comprehensive Plan. Most people don't look at the impacts unless it's associated with a private project. There is that difference that SEPA goes through in the EIS, the non-project versus the programmatic evaluation.

Toews: After the close of the comment period on the Draft Environmental Impact Statement, we will begin preparation of the final EIS and respond to each of those comments. I don't think that is the case with comments or testimony that will be submitted on the goals and policies after the preparation of the FEIS. I think it will be up to the Planning Commission and the City Council at that point to determine how they want to respond to the public testimony on the Comp Plan.

Jenks: On the Comp Plan, but I'm talking about the EIS.

Robison: On the EIS all the comments will be on the FEIS.

Jenks: And that's part of the green book? **Robison:** Yes.

Q. Audience: Is there a certain time period for comments?

A. Toews: The comment period on the draft EIS portion of the document lapses or closes at 5:00 p.m, Friday, February 9, (a week from this coming Friday.)

Robison: And then we would have about a month to issue the FEIS based on those comments. If we don't get comments from the public; we won't get a whole lot. We usually get them from the State agencies, Jefferson County, and the Transit Authority, and things like that, and a few citizens.

Q. Audience: Was asked if he owned property in Port Townsend? His answer was yes. Was asked if he was interested in participating through the public process? His answer was yes.

A. Robison: Told him written comments could also be submitted to the Planning Commission and to the City Council, if he can't make it over for a public presentation. Asked if there were any other comments, observations, or questions?

Q. Jenks: How do you see the difference between a comment, say a private comment, on the Comp Plan and a comment on the EIS? What is the difference between those kinds of comments?

A. Robison: Will you define what private is? What do you mean by private?

Jenks: Non-Public Agency. Ordinary folks

Toews: The difference is with the Green Book; we're required to provide a response in writing. With public comments on the Draft Plan is up to the decision maker, the Council, or the recommending body, the Planning Commission to determine how best to respond to comments received from citizens. I have seen a wide range in how jurisdictions typically respond to citizen comments on Plan proposals. Some will go through and just try to identify the major themes of

testimony received and identify or suggest changes to a document based on those themes. Others go into great detail and will list out the specific comments and how the Plan in its final form does or does not address the comments. So ultimately it is up to the Planning Commission and Council to decide how they want to do that.

Jenks: If somebody is looking at the Environmental Impact Statement, an ordinary person, and they are also looking at the Comp Plan, they come to this hearing and it's specifically for comments on the EIS, what would be the difference in their response to the EIS. They want to comment, but they don't know if their comment is appropriate to the EIS or to the Comp Plan. How do we see the difference between those two kinds of comments?

Toews: I see comments on the EIS really relating to whether the environmental impact statement, really Chapters X and XI of the draft, adequately identify the environmental impacts that are associated with each alternative, whether those chapters also suggest appropriate mitigation measures to reduce the level of impact identified. That really is the focus of public comment on the EIS. Does the document adequately identify the impacts that are likely to be associated with the alternatives? And related to that, does the document identify mitigation measures that will reduce the impacts to a level of non-significance as opposed to commenting, to say, "I disagree with the policy that manufactured homes should be allowed in all residential areas of the city." That really is a comment on the substance of the Plan versus the EIS.

Q. Audience: I want to expand on what you said. You have a summary paper. We are going to do one, and it is a bigger impact, utilities, etc. That was a subjective judgment. My judgment might be different. I disagree with you. I have an opinion and you have an opinion.

A. Toews: That's an appropriate comment. The Environmental Impact Statement attempts to provide the reasoning behind those qualitative differences that are identified in the table that Mr. Robison showed earlier. Certainly, a citizen can come forward and say, "I disagree. I think that you have misjudged the utility impacts of Alternative No. 3 and this is the reason why," that is absolutely appropriate and is something that would be addressed in the FEIS.

Robison: And that FEIS is something that should be read by the Planning Commissioners and City Council before they make a decision. Then they will say, "Staff maybe erred here, and the Planning Commission really should be looking more at Alternative No. 1 or 2," or whatever.

Audience: My dilemma is that's a big document, and I look at your table -- there isn't enough information in the big document for me to say, "You came to the wrong conclusion." It just isn't there, so I'd have to go to some other source and say, "I disagree with you," or "I agree with you." It's very difficult for a private citizen.

Robison: It's not quantitative enough.

Jenks: There's another factor though. . . . come in large numbers and theoretically you have five or six . . . at a level of expertise who are kind of riding on their gut feelings about the way they want the community to be. They all stand up and say, "I disagree that the utilities element is adequately addressed, for Alternative No. 3," or "I just disagree about the same thing." Then they form a weight of their own, because there are four or five of them making the same comment, even if it's just, "I disagree." One person, maybe not; but four or five people disagreeing about the same thing, you have to pay attention to that sort of thing. So, it's not totally hopeless.

Audience:

Robison: But they will be here when we get into the Comprehensive Plan. You are right on the environmental analysis. What we did is, we looked at a lot of environmental impact statements from other jurisdictions and used some as models as the best way to help explain some of the impacts to the best of our ability. That was the most appropriate tool that we could use, even though it was subjective. That's why we got three of us around the table to argue about it as we went through the all those matrices.

Toews: One thing I wanted to be clear about that we touched on earlier, we talked about the role of the Final EIS. It's not simply to say, "We've received your letter, please refer to this page in the Environmental Impact Statement." There are many instances in which a comment on the Draft Environmental Impact Statement will identify an area that requires further analysis, and further work, and that also is appropriate in the Final Environmental Impact Statement. So, if citizens come forward and say, "The analysis of this particular aspect of the environment isn't adequately considered in the EIS," then the Final Environmental Impact Statement will contain that analysis.

Audience: How do I get a copy of that nice chart you put up there? . . . I would like it for a project.

Robison: I can make you a copy of that right now.

Meeting adjourned.

Sheila Avis, Transcriber